

**APPROPRIATE ASSESSMENT
REGARDING A PLANNING APPLICATION FOR THE
CONSTRUCTION OF 3 X 4 BED DOMESTIC DWELLINGS
AT
CLIFF ROAD, ENNISCRONE, CO. SLIGO**

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ACKNOWLEDGEMENTS

The Author wishes to acknowledge the essential contribution of National Parks and Wildlife whose maps, site synopsis, Natura Data forms, conservation objectives and supporting documents have enabled the compilation of this report.

1.0 INTRODUCTION

1.1 THE REQUIREMENT FOR AN ASSESSMENT UNDER ARTICLE 6

The requirement for appropriate assessment is set out in the ED Habitats Directive (92/43 EEC) in Article 6.3 which states:

'any plan or project not directly connected with or necessary to the management of the 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'

1.2 THE AIM OF THIS REPORT

This Appropriate Assessment has been prepared in accordance with the current guidelines as prescribed by NPWS (NPWS, 2009, Revised February 2010), the EU guidance on the provisions of Article 6 of the 'Habitats' Directive (2018), the OPR Practice Appropriate Assessment Screening for Development Management 2021 (Note PN01); it provides an impact assessment for the proposed development of 4 detached domestic dwellings at Cliff Road, Enniscrone, Co. Sligo.

The DOE in a communication entitled "Appropriate Assessment of plans and projects in Ireland, Guidance for planning authorities" have stated that "There are no prescribed methods for undertaking appropriate assessment, or form or content for reporting and although there are some worked examples of formats that can be used" however these are not suitable where multiple sites have to be considered and particularly where a number of Natura sites within the 15Km radius of the proposed plan or project may be eliminated at a screening stage.

The Appropriate Assessment should provide sufficient data and information to the Local Authority in order to establish whether or not the proposed development is likely to have a significant impact on the Natura sites considered and impart sufficient information to assist the competent authority in its decision-making process. Cognisance is taken of the Natura sites conservation objectives, qualifying interest species and qualifying interest habitats for which the Natura 2000 conservation sites were designated.

NHA's (pNHA's) do not have a statutory designation and as such protection of such areas is restricted to (1) AEOS, GLAS and environmental agricultural schemes and plans which require conservation of NHA's and operate for a period of five years, (2) Forest service requirements for NPWS approval prior to payment of afforestation grants and (3) recognition of the ecological value of NHA's by planning and licensing authorities. By performing the ecological impact assessment in a transparent logical sequence then, in relation to the habitats and species of the Natura sites, together with their conservation objectives, the NIS report should furnish sufficient information and data to satisfy the screening process required for the first stage of the process pursuant to Article 6.3 of the ED Habitats Directive. In addition the report should impart sufficient data to enable the Competent Authority to complete the Appropriate Assessment process if deemed necessary.

1.3 THE APPROPRIATE ASSESSMENT PROCESS

1.4 INTRODUCTION

There is a requirement, under Article 6(3) of the ED Habitats Directive (Directive 92/43/EEC), to carry out an Appropriate Assessment. The first step of the Appropriate Assessment process is to establish whether, in relation to a particular plan or project, Appropriate Assessment is required. Article 6(3) states:

'Any plan or project not directly connected with or necessary to the management of the 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 the 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.'

A number of guidance documents and Court (EU / High Court) Rulings on the appropriate assessment process should be considered during the preparation of an Appropriate Assessment. These are listed below however this list is not exhaustive:

- (i) Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (NPWS 2009, Revised February 2010);
- (ii) CIEEM (2018) Guidelines for Ecological impact assessment in the UK and Ireland: Terrestrial, freshwater, coastal and marine (version 1.1).
- (iii) Status of EU protected Habitats and species in Ireland: Article 17 Report (NPWS 2019)
- (iv) 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 (Nov. 2001 - published 2002);
- (v) Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (2000).
- (vii) EU Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (2007);
- (viii) The European Commission 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*).
- (ix) EU Managing Natura 2000 sites and the provisions of Article 6 of the 'Habitats' Directive (*2018*).

(x) European Court of Justice 7th November 2018; Case C 461/17; *Holohan & Others v. An Bord Pleanála* - all the habitats and species for which the Natura 2000 site is protected must be catalogued; an Appropriate Assessment must identify and examine the implications of the proposed project for species present on the Natura 2000 site, including species for which the site has been listed and those for which it has not, provided those implications are liable to affect the conservation objectives of the site; an Appropriate Assessment must identify and examine the implications of the proposed project for species and habitats outside the boundaries of the Natura 2000 site, provided those implications are liable to affect the conservation objectives of the site; the competent authority may grant consent for a plan or project that leaves for later decision the determination of certain parameters relating to the construction phase if the competent authority is certain (i.e. 'no reasonable scientific doubt') that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

(xi) High Court Ruling 2nd February 2019 by Mr. Justice Barniville; Neutral Citation [2019] IEHC 84; High Court Record No. 2017 883 JR; *Kelly -v- An Bord Pleanála & Anor-* SUDS are not mitigation measures which a competent authority is precluded from considering at the stage 1 screening stage.

(xii) European Court of Justice 19th April 2018; Case C 164/17; *Grace & Sweetman -v- An Bord Pleanála* – a measure compensating for the negative effects of a project cannot be taken into account in an Appropriate Assessment Natura Impact Statement (Stage 2).

(xiii) European Court of Justice Judgement 12th April 2018 by the Seventh Chamber; Case C 323/17; *People Over Wind & Sweetman -v- Coillte Teoranta* - it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on a Natura 2000 site

(xiv) High Court Ruling 25th February 2016 by Mr. Justice Barton; Neutral Citation [2016] IEHC 134; High Court Record No. 2013 450 JR; *Balz & Heubach -v- An Bord Pleanála* - recording complete definitive and precise findings, and conclusions re Appropriate Assessment.

(xv) High Court Ruling 24th November 2014 by Mr. Justice Hedigan; Neutral Citation [2014] IEHC 557; High Court Record No. 2014 320 JR; *Rossmore Properties Limited & Anor -v- An Bord Pleanála* – where mitigation measures are an intrinsic part of a project, they may be taken into account in the stage 1 screening process.

(xvi) High Court Ruling 25th July 2014 by Ms. Justice Finlay Geoghegan; Neutral Citation [2014] IEHC 400; High Court Record No. 2013 802 JR; *Kelly -v- An Bord Pleanála* – judicial review of grant of planning by An Bord Pleanála for two wind farm phases in County Roscommon, including failure of ABP to carry out lawful appropriate assessment and giving reasons for its determination.

(xvii) European Court of Justice Judgement 11th April 2013 by the Third Chamber; Case C258/11 *Peter Sweetman and Others v An Bord Pleanála* - criteria to be applied when assessing the likelihood that a project or plan (N6 Galway City Outer Bypass road scheme in this case) will adversely affect the integrity of a Natura 2000 site (Lough Corrib SAC in this case), where the integrity of a Natura 2000 site is considered to be adversely affected if a plan or project is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site.

(xviii) European Court of Justice Opinion 22nd November 2012 by Advocate General Sharpston; Case C258/11 *Peter Sweetman and Others v An Bord Pleanála* – in determining whether a project or plan has an adverse

effect on the integrity of a site (to which Article 6(3) of Council Directive 92/43/EEC applies), an effect which is permanent or long lasting must be regarded as an adverse effect.

(xviii) Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes: Practitioner’s Manual (EPA 2013).

(xix) Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Commission Notice (European Commission 2018).

(xx) European Court of Justice ruling in 2013 (Case C258/11) has stated the following regarding significant effect: “Where a plan or project not directly connected with or necessary to the management of a site is likely to undermine the site’s conservation objectives, it must be considered likely to have a significant effect on that site. The assessment of that risk must be made in the light of, in particular, the characteristics and specific environmental conditions of the site concerned by such a plan or project (see, to this effect, Waddenvereniging and Vogelbeschermingsvereniging, paragraph 49)”

(xxi) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – European Commission Methodical Guidance on the provisions of Article 6(3) and 6(4) of the ‘Habitats’ Directive 92/43/EEC (European Commission 2001).

(xxii) High Court Ruling 2nd February 2019 by Mr. Justice Barniville; Neutral Citation [2019] IEHC 84; High Court Record No. 2017 883 JR; Kelly -v- An Bord Pleanála & Anor- SUDS are not mitigation measures which a competent authority is precluded from considering at the stage 1 screening stage.

(xxiii) OPR Practice Appropriate Assessment Screening for Development Management 2021 (Note PN01)

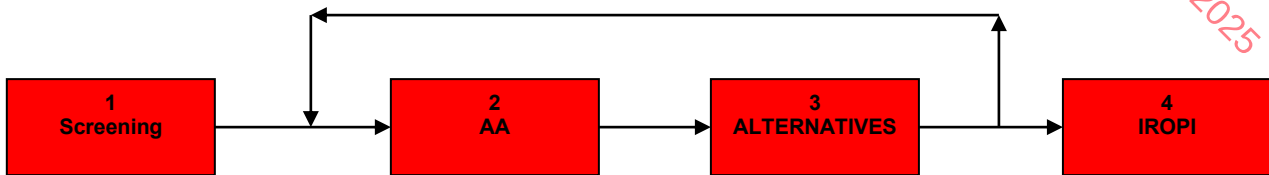
Where it cannot be deduced or proven with certainty that the development will not have a significant effect on the Natura 2000 sites then it is necessary and appropriate to carry out an appropriate assessment on the ramifications of the development on the sites with respect to their qualifying interests and conservation objectives. The guidance for Appropriate Assessment (NPWS, 2009, revised February 2010) states:

"AA is an impact assessment process that fits within the decision-making framework and tests of Articles 6(3) and 6(4) and, for the purposes of this guidance, it comprises two main elements. Firstly a Natura Impact Statement - i.e. a statement of the likely and possible impacts of the plan or project on a Natura 2000 site (abbreviated in the following guidance to "NIS") must be prepared. This comprises a comprehensive ecological impact assessment of a plan or project; it examines the direct and indirect impacts that the plan or project might have on its own or in combination with other plans and projects, on one or more Natura 2000 sites in view of the sites' conservation objectives. Secondly, the competent authority carries out the AA, based on the NIS and any other information it may consider necessary. The AA process encompasses all of the processes covered by Article 6(3) of the Habitats Directive, i.e. the screening process, the NIS, the AA by the competent authority, and the record of decisions made by the competent authority at each stage of the process, up to the point at which Article 6(4) may come into play following a determination that a plan or project may adversely affect the integrity of a Natura 2000 site".

A High Court ruling in 2018 dictates that where compensation or mitigations measures are applied to a plan or project then that plan or project must be assessed by means of a Natura Impact Assessment as opposed to a Screening Document.

1.5 STAGES

The European Commission's guidance promotes a four stage process, as set out in Box 1 below, to complete the Appropriate Assessment, and outlines the tests required at each stage. Stages 1 and 2 deal with the main requirements for assessment under Article 6.3 Stage 3 may be part of Article 6(3) or a necessary precursor for Stage 4.



This report includes the ecological impact assessment and testing required under the provisions of Article 6(3) (as set out in the EU Guidance documents).

EU guidance¹ states:

"This stage examines the likely effects of a project or plan, either alone or in combination with other projects or plans, upon a Natura 2000 site and considers whether it can be objectively concluded that these effects will not be significant. This assessment comprises four steps:

- (i) determining whether the project or plan is directly connected with or necessary to the management of the site;
- (ii) describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 site;
- (iii) identifying the potential effects on the Natura 2000 site;
- (iv) assessing the significance of any effects on the Natura 2000 site".

¹ Paragraph 3.1 of '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 (Nov. 2001)

Abbreviations:

AFA – Area for Action

CFRAM – Catchment Flood Risk Assessment and Management

CO – Conservation Objectives

CIEEM - Chartered Institute of Ecology and Environmental Management

CSA – Critical Source Area

GSI – Geological Survey of Ireland

GWPR - Ground Water Protection Response

IFI – Inland Fisheries Ireland

IQG – Indicative Quality Guide

LSU – Live Stock Units

NF – Natura Data Form

NPWS – National Parks and Wild Life

NMP – Nutrient Management Plan

OPW – Office of Public Works

OSWWTS – On Site Waste Water Treatment System

PIP – Pollution Index Potential

PE – Population Equivalent

PAA – Priority Area for Action

QIG – Qualifying Interest Habitats

QIS – Qualifying Interest Species

SCI – Special Conservation Interests

SY – Site Synopsis

WFD - Water Framework Directive

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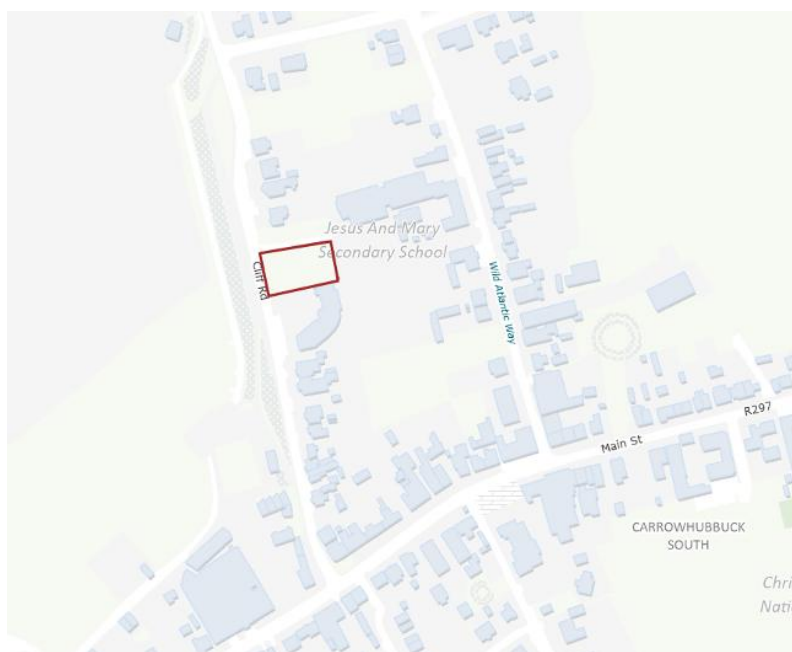
2.0 STAGE 1: AA SCREENING

Planning Application Number

New Application

2.1 Development Location

The West facing 0.239Ha urban street lit green field infill site is located in the Enniscrone urban area with an address at Cliff Road, Enniscrone, Co. Sligo.



(See additional maps in appendix B).

2.2 Development Type

The development consists of the construction of 3 X 4 bed two and a half storey detached dwelling houses (1 X 190M², 1 X 177M² and 1 X 177M²), car park spaces, connection to all existing public services (Enniscrone town foul sewer D0102 (design p.e. 5,000, current loading 3,497p.e.)), Enniscrone storm water sewer, electricity, telecoms, water) and all other ancillary site work and services on a brown field street lit urban infill site.

2.3 Receiving Environment

The urban street lit 0.239Ha green field infill development site is currently disused and is classified as GA1 (disused improved agricultural grassland) as the botany on site does not facilitate it being classified under any other category. The Cliff road runs along the Western side with residential structures and a car park to the North, residential structure to the South and a secondary school and amenity area to the East.

The development site is located in an area drained by the River Moy and all streams entering tidal water on Killala Bay between Benwee Head and Lenadoon Point, Co. Sligo, draining a total area of 2,345km². The largest urban centre in the catchment is Castlebar. The other main urban centers in this catchment are Ballina, Tubbercurry, Kiltimagh, Swinford, Foxford, Enniscrone and Crossmolina. The total population of the catchment is approximately 77,262 with a population density of 33 people per km² and the 2022 census indicated that the population of Enniscrone is 1,291. The lowland parts of the catchment are underlain by various types of limestone while the upland areas from the Ox Mountains and Croaghmoyle are underlain by a band of igneous and metamorphic rocks. Much of the lowland area south of Lough Conn exhibits a drumlin topography. There are extensive sand and gravel aquifers lying between Swinford and Charlestown to as far south as Knock, to the east of Ballina and southwest of Crossmolina more specifically the development site is located in the Leaffony 010 sub catchment and more specifically in the Quigabar 010 sub basin. Although it is located in the Quigabar sub basin its coastal location dictates that there are no direct or indirect hydro geological links between it and any fresh water system. There are no drains, streams or water courses within >100M of the proposed development site boundary. The coastal waters HWM is located 30M to the West, on the opposite side of the Cliff Road, at a much lower elevation relative to the proposed development site.

Quigabar 010 Sub Basin outlined in yellow



The proposed development site is located in an EPA “Area for Action” however there is currently no PAA report available.

EPA Area for Action



Under the WFD^{3rd} cycle the “Risk” to the Quigabar 010 River is currently “Under Review” and is currently classified as being of “Good” status under the WFD 3rd Cycle however there is currently no monitoring of the surface water quality in the stream and the classification are based on “Modeling”.

EPA Risk (WFD)



As there is no surface water monitoring of the stream no comment can be made on Ammonia (as N), Ortho P or TON. The EPA Q values are more pertinent regarding empirical evidence when completing the AA process which is ratified by the detailed conservation objectives which make specific reference to the Q values when considering potential impacts on species however there is currently no EPA Q value stations on the Quigabar Stream.

The proposed development site is not located with the boundary of a Natura site nor is it contiguous to one and it is located on the extreme Eastern end of both the SAC and SPA. The Terrestrial section of the Killala Bay / Moy Estuary SAC 000458 is located 7.4M West of the development site boundary and the terrestrial section of the Killala Bay / Moy Estuary SPA 0004036 is located 29.6M to the West of the Development Site boundary. The proximity of the proposed development site in relation to the Natura sites is deceptive with respect to connectivity. The development site is segregated from the natura sites by the Cliff Road, a 1.2M concrete wall and a concrete promenade with steps.

Location of the SPA Natura Site Relative to the proposed development site.

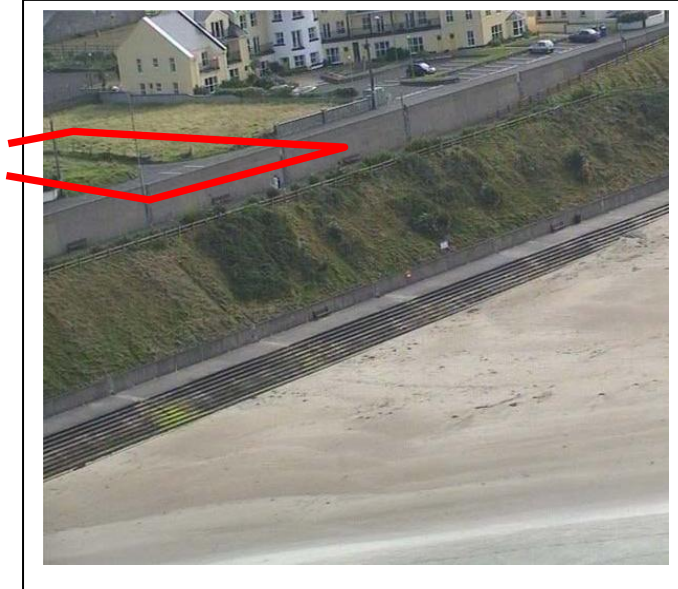


Location of the SAC Natura Sites Relative to the proposed development site.



Location of Natura Sites
development site.

Relative to the proposed



Location of Natura Sites Relative to the proposed development site.

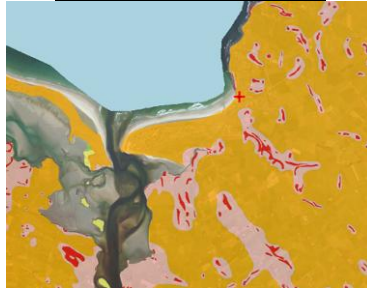


The underlying geology DUIL (Dinantian Pure Bedded Limestone) which contains a Locally important aquifer (LI) with High (H) vulnerability. The principle soil group on the site is classified by the GSI as “Made ground” with the underlying sub soil also classified as “Made Ground”. This reflects the urban nature and indicates that the soils and sub soils have been historically highly modified.

GSI Aquifer Potential



GSI Aquifer Vulnerability



GSI Bedrock



GSI Soils



GSI Sub Soils



The relative risk to groundwater is considered low with respect to N, MRP and pathogens. Because of the proximity to the sea shore on made ground the GSI has not classified the near Surface Susceptibility, the near surface P susceptibility or the sub surface N susceptibility.

NSN



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NSP



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SSN



There are no PIP-P flow delivery points or flow delivery paths on or contiguous to the proposed development site.

PIP-P Flow Delivery paths / points.



The WFD / NRBMP indicate that the ground water status is “Good”, “Not at Risk” and not in an “Area for Action”.

EPA Ground Water Risk and Status.



Ground Water Status 2016 - 2021	Assessment Technique	Status Confidence	Value
Overall Groundwater Status			Good
Quantitative Groundwater Status			Good
Saline (or Other) Intrusions Test			Good
Impact of Groundwater on Surface Water Ecological/Quantitative Status Test			Good
Groundwater Dependent Ecosystems (GWDTE) - Quantitative Assessment Test			Good
Water Balance Test			Good
Chemical Groundwater Status			Good
Saline (or Other) Intrusions Test			Good
Impact of Groundwater on Surface Water Ecological/Chemical Status Test			Good
Groundwater Dependent Ecosystems (GWDTE) - Chemical Assessment Test			Good
Drinking Water Protected Area Test			Good
General Chemical Assessment Test			Good

Parameter	Station Name	Period	Indicative Quality	Trend	Dist to Threshold
Ammonia-Total (as N)	Kilasser	Annual	Good	Upwards	Far
Chloride	Kilasser	Annual	Good	Downwards	Far
Conductivity @25°C	Kilasser	Annual	Good	Upwards	Far
Nitrate (as NO3)	Kilasser	Annual	Good	Downwards	Far
ortho-Phosphate (as P) - unspecified	Kilasser	Annual	Good	None	Far

The Killala Bay coastal waters are classified by the EPA under the WFD as being of Good Status and “Not At Risk”.

Coastal Water Risk and Status



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Coastal Water Status 2016 - 2021	Assessment Technique	Status Confidence	Value
Ecological Status or Potential	Monitoring	high confidence	Good
Biological Status or Potential			Good
Invertebrate Status or Potential			Good
Hydro morphological Conditions			Good
Supporting Chemistry Conditions			High
General Conditions			High
Nutrient Conditions			High
Nitrogen Conditions			High

The CFRAM maps indicate that the development site is not located in an indicative high end future 1% or 0.1% AEP coastal flood risk area.

CFRAM High End future scenario coastal Mapping



There are no geological features (karst features, caves or sink holes) within >250M from the development site boundary. The air quality in the area is described as very good (zone D) which translates to the following, SO₂ 0-49µgM⁻³ (1hr average), NO₂ 0-36 µgM⁻³ (1hr average), O₃ 0-39 µgM⁻³ (1hr average) and PM₁₀ 0-19 µgM⁻³ (24hr average).

2.4 Brief description of the Key Components of the project

The development consists of the construction of 3 X 4 bed two and a half storey detached dwelling houses (1 X 190M², 1 X 177M² and 1 X 177M²), car park spaces, connection to all existing public services (Enniscrone town foul sewer D0102 (design p.e. 5,000, current loading 3,497p.e.), Enniscrone storm water sewer, electricity, telecoms, water) and all other ancillary site work and services on a brown field street lit urban infill site.

The development is currently programmed to take circa 12 months to complete with the heavier elements such as foundations, block works and roofing projected to take <4 months. It is intended that the work will be undertaken in the following stages:

- (1) Site set up and establishment including safety hoarding around site periphery.
- (2) Excavation of a short internal road with clean hardcore aggregate– construction road
- (3) Marking out of site services on the ground.
- (4) Marking out of house locations.
- (5) Digging foundations and groundwork's
- (6) Importing foundation aggregates.
- (7) Pouring steel reinforced concrete foundations in shuttered forms.
- (8) Block work including small scale on site concrete mixing on mixing pads.
- (9) Roofing.
- (10) Windows and doors.
- (11) First fix electrical, plumbing and carpentry.
- (12) Internal and external scratch coats and plastering including small scale on site render mixing on mixing pads.
- (13) Second fix electrical, plumbing and carpentry.
- (14) Finishing external groundwork's and landscaping.
- (15) Commissioning and decorating.
- (16) Landscaping and planting in common green areas

The resources required on the project will be similar to any housing construction project of this size, nature and scale and it is envisaged that the following plant will be required on site:

- 1 No. 3, 12 and 16 ton excavator and attachments
- 1 No. 6 ton dumper
- 1 No. 14m teleports
- 1 No. cement mixer
- 1 No. 5 ton vibrating roller – foundations and roads
- 1 No. whacker plates
- 6 and 8 wheeler tipper lorries (as required for deliveries of aggregates).

2.5 Natura 2000 site(s) within 15Km Zone

NHA's / pNHA's are included in the for assessment where they are stand alone sites , where there is dual designation i.e. both an SPA or SAC and an NHA then the Natura site designation is considered in preference to the NHA designation. It is an objective, at EU level, to increase or expand the number and / or areas designated as SAC's or SPA's consequently there is a likelihood that certain NHA's (or section there of) will be re-designated as Natura Sites at a future date which has implications for the section of any assessment which considers planned or contemplated nature conservation and / or Biodiversity targets. It is the considered opinion that the omission of the NHA's / pNHA's from the Appropriate Assessment (AA) process would result in the process being deficient and therefore they have being included. Not withstanding this it is the prerogative of the competent authority to include or omit these sites when completing the AA process however their inclusion, in this report, does not compromise the validity of the Appropriate Assessment process.

2.6 Preliminary Assessment of Natura 2000 site(s) within 15Km Impact Zone

Natura Sites Within 15Km	Qualifying Interests	Distance & Direction	Comments:	Further Consideration Required
Killala Bay / Moy Estuary SAC 000458	SAC 1014] <i>Vertigo angustior</i> [1095] <i>Petromyzon marinus</i> [1130] Estuaries [1140] Mudflats and sandflats not covered by seawater at low tide [1210] Annual vegetation of drift lines [1310] Salicornia and other annuals colonizing mud and sand [1330] Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1365] <i>Phoca vitulina</i> [2110] Embryonic shifting dunes [2120] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") [2130] * Fixed coastal dunes with herbaceous vegetation ("grey dunes") [2190] Humid dune slack http://www.npws.ie/sites/default/files/protectedsites/conservation_objectives/C0000458.pdf	7.4M West	Potential indirect hydro geological links and proximity require further precautionary consideration.	Yes

River Moy SAC 002298	[1092] <i>Austropotamobius pallipes</i> [1095] <i>Petromyzon marinus</i> [1096] <i>Lampetra planeri</i> [1106] <i>Salmo salar</i> (only in fresh water) [1355] <i>Lutra lutra</i> [7110] * Active raised bogs [7120] Degraded raised bogs still capable of natural regeneration [7150] Depressions on peat substrates of the Rhynchosporion [7230] Alkaline fens [91A0] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91E0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [6510] Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>) http://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002298.pdf	9.66Km SW	No direct or indirect links to the proposed development site. No potential for ex situ use of the development site by any of the qualifying interest species. No qualifying interest habitats on or in proximity to development site. Development site not visible from the Natura site. No potential for the qualifying interest to expand in range such that they would encompass the proposed development site. The proposed development site is ecologically, geographically and hydro geologically isolated from the Natura site. No potential impact on the conservation objectives. No interdependence between the development site and the qualifying interests.	No
Ox Mountains Bog SAC 002006	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] European dry heaths [4030] Blanket bogs (* if active bog) [7130] Transition mires and quaking bogs [7140] Depressions on peat substrates of the <i>Rhynchosporion</i> [7150] <i>Vertigo geyeri</i> (Geyer's Whorl Snail)	9.54Km SE	No direct or indirect links to the proposed development site. No potential for ex situ use of the development site by any of the qualifying interest species. No qualifying interest habitats on or in proximity to development site. Development site not visible from the Natura site. No potential for the qualifying interest to expand in range such that they would encompass the proposed development site. The proposed development site is ecologically, geographically and hydro geologically isolated from the Natura site. No potential impact on the conservation objectives. No interdependence between the development site and the qualifying interests.	No

	[1013] Saxifraga hirculus (<i>Marsh Saxifrage</i>) [1528] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002006.pdf			
Killala Bay / Moy Estuary SPA 004036	SPA <i>Charadrius hiaticula</i> [wintering] <i>Pluvialis apricaria</i> [wintering] <i>Pluvialis squatarola</i> [wintering] <i>Calidris alba</i> [wintering] <i>Calidris alpina</i> [wintering] <i>Limosa lapponica</i> [wintering] <i>Numenius arquata</i> [wintering] <i>Tringa totanus</i> [wintering] Wetlands https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004036.pdf	29.6M West	Potential indirect hydro geological links and proximity require consideration.	Yes
Lackan Saltmarsh and Kilcummin Head SAC 000516	Habitats 1310 Salicornia and other annuals colonising mud and sand 1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* http://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000516.pdf	10.5Km W	No direct or indirect links to the proposed development site. No potential for ex situ use of the development site by any of the qualifying interest species. No qualifying interest habitats on or in proximity to development site. Development site not visible from the Natura site. No potential for the qualifying interest to expand in range such that they would encompass the proposed development site. The proposed development site is ecologically, geographically and hydro geologically isolated from the Natura site. No potential impact on the conservation objectives. No interdependence between the development site and the qualifying interests.	No

The proposed development will not have any significant or insignificant, direct or indirect impacts on the Natura sites not requiring further consideration and it will not impact on their Conservation objectives or negatively impact on the qualifying interests (QIH / QIS) or special conservation interests (SCI) due to the separation distances involved.

The Site Synopsis as described by the NPWS for the Natura site(s) requiring further consideration are included in the Appendix where available. NPWS, whom are the state body with statutory responsibility for all Natura sites (SPA/SAC) and NHA's, generate the site Synopsis and given their significance are presented in the appendix of this report in an un-condensed format; free from editing, abbreviation, interpretation or summation. This ensures that there are no erroneous omissions from the natura sites descriptions which facilitate, not just the competent authority, but also any other state body, public body or private individual in assessing each Natura site that was further considered in its own merit within the frame work of the document with no requirement to direct the reader to other sources of information or data. The inclusion of the site Synopsis for each SAC / SPA / NHA in the report is necessary and essential as computer literacy, access to technology and or broad band cannot be assumed which may prohibit members of the public from accessing and assessing the data on which the report is based and ensures that both the transparency and integrity of the Planning System is maintained. The NHA's do not have a statutory designation. Protection of such areas is restricted to (1) Agricultural Environmental Plans which require conservation of NHA's, (2) Forest service requirements for NPWS approval prior to payment of afforestation grants and (3) recognition of the ecological value of NHA's by planning and licensing authorities.

2.7 Site Code(s) of Natura Site(s) for Further Consideration

Killala Bay / Moy Estuary SAC 000458

Killala Bay / Moy Estuary SPA 004036

2.8 Distance of the proposed project from the Natura site(s) in the potential Impact zone

The Terrestrial section of the Killala Bay / Moy Estuary SAC 000458 is located 7.4M West of the development site boundary

The terrestrial section of the Killala Bay / Moy Estuary SPA 0004036 is located 29.6M West of the Development Site boundary.

2.9 Description of the Natura Site(s) for Further Consideration: (Detailed ecological data can be Given in the appendices and the NPWS Site Synopsis should be referenced)

Killala Bay / Moy Estuary SAC 000458

Other Site Characteristics

Situated on the north Mayo/Sligo coast, this large site comprises the inner part of Killala Bay, including the estuary of the River Moy from downstream of Ballina. The towns of Enniscrone and Killala occur on the eastern and western shores respectively. Sand dunes systems, estuaries and intertidal areas are the main habitats of the site. Bartragh Island, a sand bar on which a dune system has developed, stretches across most of the outer part of the site. A further dune system protrudes westwards from Enniscrone, while more dunes occur at the Ross peninsula in the north-west of the site. Other habitats present include salt marshes, dry grassland, reedbeds and scrub.

Killala Bay / Moy Estuary SPA 004036

Other Site Characteristics

This large site comprises the inner, estuarine part of Killala Bay, at the mouth of the River Moy. It is a funnel-shaped estuary that is approximately 7 km wide at its outer limit. The site is well-sheltered by a sandy island, Bartragh Island, that extends across much of the outer part, and by a sandy peninsula which extends from Enniscrone on the eastern side. Extensive intertidal sand and mud flats are exposed at low tide. Salt marshes skirt part of the intertidal flats.

2.1.0 Qualifying Interests of the Natura 2000 Site(s) for further consideration (From NPWS)

Killala Bay / Moy Estuary SAC 000458

Estuaries [1130]

Mudflats and sandflats not covered by seawater at low tide [1140]

Annual vegetation of drift lines [1210]

Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]

Salicornia and other annuals colonising mud and sand [1310]

Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330]

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]

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

Petromyzon marinus (Sea Lamprey) [1095]

Phoca vitulina (Harbour Seal) [1365]

Killala Bay / Moy Estuary SPA 004036

Qualifying Interests

Ringed Plover (*Charadrius hiaticula*) [A137]

Golden Plover (*Pluvialis apricaria*) [A140]

Grey Plover (*Pluvialis squatarola*) [A141]

Sanderling (*Calidris alba*) [A144]

Dunlin (*Calidris alpina*) [A149]

Bar-tailed Godwit (*Limosa lapponica*) [A157]

Curlew (*Numenius arquata*) [A160]

Redshank (*Tringa totanus*) [A162]

Wetland and Waterbirds [A999]

2.1.1 Other Notable Features of the Natura 2000 Site(s) (From Natura 2000 Data Form)

Killala Bay / Moy Estuary SAC 000458 (Version: October 2020)

Other Site Characteristics

Situated on the north Mayo/Sligo coast, this large site comprises the inner part of Killala Bay, including the estuary of the River Moy from downstream of Ballina. The towns of Enniscrone and Killala occur on the eastern and western shores respectively. Sand dunes systems, estuaries and intertidal areas are the main habitats of the site. Bartragh Island, a sand bar on which a dune system has developed, stretches across most of the outer part of the site. A further dune system protrudes westwards from Enniscrone, while more dunes occur at the Ross peninsula in the north-west of the site. Other habitats present include salt marshes, dry grassland, reedbeds and scrub.

Quality and importance

This large site displays an excellent diversity of dune types and is one of the most important dune systems in the north-west region. There remains a substantial area of intact fixed dune despite modifications to parts of the site for recreational and agricultural purposes. Some humid dune slacks also occur, and there are good and fairly extensive examples of shifting dunes with marram, embryonic shifting dunes and annual vegetation of driftlines. Salt marshes are well represented, with both Atlantic salt meadows and *Salicornia* types present. The Moy estuary is an important example of an estuary and has extensive intertidal sand and mud flats. Water quality is very good. The site is important for the occurrence of the Annex II mollusc *Vertigo angustior*, which occurs in marsh habitat. An excellent diversity of waterfowl winter at site, including two Annex I Bird Directive species (*Pluvialis apricaria*, *Limosa lapponica*). Seven other species winter in nationally important numbers, and in some winters internationally important concentrations of *Branta bernicla hrota* occur. Two Red Data plant species are known from site. The site supports an important population of *Phoca vitulina* and both adult and juvenile *Petromyzon marinus*.

VULNERABILITY

Threats, pressures and activities with impacts on the site. The most important impacts and activities with high effect on the site are listed in the following tables.

NPWS Identified Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i o b]
H	E01		b
H	G01.02		i
H	G02.02		b
H	G02.08		b
H	H01.08		b
L	F02.03		i
M	M01.03		i

Positive Impacts

Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i o b]
H	J02.04		i

Rank: H = high, M = medium, L = low, Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification, T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions i = inside, o = outside, b = both

Killala Bay / Moy Estuary SPA 004036 (Version: October 2020)

Other Site Characteristics

This large site comprises the inner, estuarine part of Killala Bay, at the mouth of the River Moy. It is a funnel-shaped estuary that is approximately 7 km wide at its outer limit. The site is well-sheltered by a sandy island, Bartragh Island, that extends across much of the outer part, and by a sandy peninsula which extends from Enniscrone on the eastern side. Extensive intertidal sand and mud flats are exposed at low tide. Salt marshes skirt part of the intertidal flats.

Quality and importance

This site is a fine example of an estuarine system in a natural state. It supports an excellent diversity of wintering waterfowl and is one of the most important sites in the region. Six of the species have populations of national importance: *Limosa lapponica*, *Charadrius hiaticula*, *Pluvialis squatarola*, *Calidris alba*, *Calidris canutus* and *Calidris alpina*. *Pluvialis apricaria* also occurs in numbers close to national importance. There is a regular population of *Branta bernicla hrota* which in some winters exceeds the threshold for international importance. *Gavia stellata* is regular within the site. The Red Data Book species *Groenlandia densa* occurs in the site.

VULNERABILITY

Threats, pressures and activities with impacts on the site. The most important impacts and activities with high effect on the site are listed in the following tables.

Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i o b]
M	F02.03		i
M	A08		o
M	E01		o
M	G01.02		i

Positive Impacts			
Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i o b]
M	F02.03		i

2.1.2 Elements of the Proposed Project where the Potential Impacts are Likely or Unknown

THE HIGH COURT [2022] IEHC 540 2021/856JR Environmental Trust Ireland vs An Bord Pleanála, Limerick City and County Council (252) Judgement stated “Risks conceivable in theory but non-existent in reality must be legion.....the risk of requiring an NIS and AA to identify and record non-existent risks for the purpose of recording them as non-existent would be a recipe for pointlessly endless documents..... attempting to conceive of all conceivable risks in order to discount them as non-existent AA is unlikely to impose such a pointless requirement”. Consequently only those aspects of the proposed project which have realistic or reasonable risks have been considered.

The proposed project is very common and all the potential impacts on the environment can be accurately predicated from published data (EPA, CIEEM, CIF, GSI, IFI) consequently there are no potential impacts that are unknown which is distinct from potential impacts that may be likely or uncertain.

The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning permission will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction.

The development site is not located within or contiguous to a natura site with no potential land take from any Natura site. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade.

The development location habitat is composed entirely of urban street lit non annexed, non designated, disused improved agricultural grassland (GA1) habitat.

The proposed development does not require water abstraction or direct discharge to surface water, land or air with the main elements of light construction being of short duration.

To construct the short internal site access road that will be required to facilitate the construction of the dwellings and will also be used for access to the completed dwellings will involve the skinning of the existing made ground (soils and sub soils) and laying clean 3” down aggregate which is then blinded using a 1/2” down chip and 804.

No Soil or sub soil will be imported on to the site as a result of the proposed development with all the soils / sub soil reworked and landscaped within it and any excess removed off site by a licensed haulier for recycling or disposal at a licensed facility.

Where aggregate for the purposes of fill is required it will be sourced in a quarry that is registered under section 261/261A of the 2000 planning and development act or have a grant of planning under that act which is standard practice. Construction and demolition waste will not be used on site for any purposes e.g. fill as it can not be certified to have the required structural properties which is standard practice on construction sites.

There are no fresh water surface features within 100M of the proposed development site which could act as a conduit to the Killala Bay / Moy Estuary SAC or SPA i.e. the Enniscrone Beach. That combined with the existing cliff road and 1.5M high concrete wall ensures that no extraneous material will or can be purposely or accidentally deposited in or introduced to the SAC or SPA area.

Post construction no changes to surface water quality (microbiologically, chemically, physically or quantitatively) are anticipated given that there are no direct or indirect discharges to or abstraction from surface water. The proposed project

will be connected to the Enniscrone public mains, foul sewer and storm water sewer. The Enniscrone foul sewer D0102 is designated for a p.e. of 5,000 with a loading of p.e. 3,497 and as such has excess capacity to cater for the proposed development.

No maintenance of heavy plant will occur on site with all preventative maintenance carried out prior to entry to the site which is industry standard for logistical reasons. Only locally sourced plant will be used on the site which is normal for small scale projects.

Refuelling of plant will only occur as necessary with no hydrocarbons for such purposes stored on site which is standard practice due to security reasons for small scale projects i.e. theft.

All empty packaging will be stored in appropriate containers for disposal as required which is normal standard practice on construction sites.

Economic considerations ensure that measures are normally implemented on construction sites to protect all construction related materials from accidental damage which has the indirect effect of ensuring that there are no accidental or unintended spillages or releases.

Batch concrete trucks are prohibited from the washing out of the drum on site (which has become industry standard due to the potential for liability under the water pollution act).

Where OFCH is utilised the tank shall be bunded to 110% of the volume of the tank and roofed. There will be no outlet at the base of the bund. Alternatively double skinned tanks may be used which is now part of the building regulations. No ponds or water features are proposed.

The restricted species as listed in appendix of this report will not be utilised or introduced for the purposes of landscaping or any other purposes as it is an offense under regulations 49 and 50.

Control of weeds within the site boundary shall be performed manually. Spot spraying of noxious weeds is permitted provided such activity conforms to the REPS / AEOS / GLAS specifications or any subsequent specification governing that activity.

No drainage works, along stream works or in stream works are proposed or required. The proposed construction is not within 100M of any lotic or lentic fresh water systems and as such naturally complies with the IFI document "*Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites*".

All construction related materials will only be stored adjacent to the construction area with the area of construction >100M from any fresh water surface feature and >30M from the HWM.

No hedgerow or tree felling, coppicing, trimming or removal are proposed or required and any destruction or removal of natura vegetation governed by the Restrictions which are set out in Section 40 of the Wildlife Act 1976 as amended by the Wildlife (Amendment) Act 2023. These Acts stipulate that it is an offence to destroy natural vegetation on uncultivated land between the 1st of March and the 31st of August each year and will have to be complied with irrespective of the type of project proposed i.e. it is not a mitigation measure.

There is no land take from a natura site and the proposed project would not require or cause any project related activities to traverse or enter a natura site.

The proposed works are sufficiently removed from the Natura site such that there will be no impact either directly or indirectly with respect to disturbance from ppv for example ppv of a hydraulic roller at 25M is only 1.5mms which truck on rough surfaces only produce a ppv of <2mm/s at 20M and consequently will be undetectable in the Natura sites.

Artificial light is not required during construction and light from subsequent habitation does not require consideration as there will be no increase in lux levels within the SPA or SAC designated area and no realistic increase in lux levels outside of the development site boundary which will be absorbed and assimilated in to the existing street lit background. The proposed project is not a noted source of light leakage.

There will be no activities associated with the development that would give rise to significant fugitive dust which would be

extremely limited and only occur during the construction phase and undetectable at 50M. Any such fugitive dust will be classified as inert and harmless in the chemical context and would not contain any of the harmful compounds as described and listed in Atmospheric Emissions by T.A. Luft, (1986), section 2.3 with the proposed project not a noted source of dust either during construction or subsequent habitation.

There is a very limited potential for disturbance of the SPA SCI avian species inside the SPA boundary during construction (impact noise from activities such as roofing) which requires further consideration with the potential for precautionary mitigation measures.

Habitation noise, light and vibration associated with the proposed project will be completely absorbed and assimilated into the existing urban back ground with RTN from the cliff road and Enniscrone street lit urban area dominating the locality and any potential increases in those parameters will be undetectable inside the boundary of the SPA or SAC.

No material will be removed from or deposited in any Natura Site as a result of a grant of planning permission.

The proposed development does not require water abstraction or direct discharge to surface water, ground water, land or air with the main elements of light construction being of short duration however the timing of the heavier elements should be considered in the context of the SPA avian species that over winter.

The data above facilitates the creation of the table / matrix below and summerises the criteria under which the potential impacts on the Natura sites were assessed and indicates the likely impacts that may be experienced and may require further consideration in a stage 2 assessment. This is not exhaustive and may be expanded under the stage 2 assessments should it be deemed necessary. The matrix below is cognisant of the fact that there is no proposal or requirement to develop or enter the SAC or SPA, no material would be deposited in or removed from the SPA or SAC and there will be no entry into any Natura designated areas as a direct or indirect result of the proposed project either during construction or with subsequent habitation.

Notwithstanding the above the proximity of the development to the SAC and SPA may require further consideration with the potential for mitigation measures.

Potential Impact	Direct Effect	Indirect Effect
Loss Natura Designated area or of undesignated Qualifying interest Habitats outside of the Natura Site boundary.	No loss of QI habitat. No loss of Natura designated area. No loss of QI habitat outside of the Natura site boundary. Development Site classified predominantly as street lit urban disused GA1.	No indirect loss of qualifying interest habitats or impact on any such habitats. No loss of QI habitat outside of the Natura site boundary. Development Site classified predominantly as street lit urban disused GA1.
Qualifying Habitat Fragmentation in the Natura Sites	No fragmentation of the SPA or SAC designated area as the development site is not located within either the SPA or SAC. The proposed development does not segregate any section of the SAC or SPA from the main body of the SAC or SPA and is located on the extreme Eastern end of both the Natura sites.	No indirect fragmentation of the SPA or SAC designated area.

Potential Impacts on the Natura Site from Disturbance i.e. entry into or material deposited in or removed from	No Potential direct disturbance of SPA SCI, SAC QIS or QIH. Proposed project assimilated and absorbed into the background and undetectable within the SAC and SPA boundary. No requirement and no potential for accidental entry into the SAC or SPA Natura designated areas.	No Potential indirect disturbance of SPA SCI, SAC QIS or QIH. Proposed project assimilated and absorbed into the background and undetectable within the SAC and SPA boundary. No requirement and no potential for accidental entry into the SAC or SPA Natura designated areas.
Impacts on the migration of SCI or QIS species.	No impacts on the migration of the SPA SCI or SAC QIS (qualifying interest species) – unimpeded migration both during construction and with subsequent habitation	No Indirect impact on the migration of species within the Natura Site due to lack of scale, duration and magnitude of the proposed project which is not located within the SPA or SAC boundary, no drainage works or in stream works proposed or required, no entry into the SAC or SPA. Post construction no impact on SPA QIS or SAC QIS
Impact on the Qualifying interest Species or special conservation interests of the Natura Sites.	No Potential direct impacts on the SPA SCI species or the SAC QIS inside of the SAC or SPA boundary.	No Potential indirect impacts on the SPA SCI species or the SAC QIS inside of the SAC or SPA boundary post construction. Impact noises during construction require further consideration with respect of the overwintering SPA SCI.
Potential Impacts on the Natura Sites from a reduction in qualifying species density.	No direct impact on the SCI or QIS habitat requirements, prey species or natura designated area.	No impact on surface water quality consequently prey species for the SCI or QIS will not be impacted. No foraging, loafing, roosting or breeding habitats for the SCI species on the proposed urban street development site which is subject to continual anthropogenic activity associated with the Enniscrone urban area. The SCI are wintering only with specific habitat requirements which are not present on the proposed development site. The potential disturbance of the SCI species from impact noise during construction requires a simple precautionary mitigation measures. Construction of the main elements of the proposed project (heavy excavation, foundation, block work, roofing, windows, doors and external rendering) should occur when the avian SPA SCI specie are not present which is a simple effective mitigation measure guaranteeing that there will be no indirect impact on them form the proposed project.

Potential Impacts on the Natura Sites Water quality (surface or ground water).	No direct impact on surface water quality either during construction or with subsequent habitation. No conduits between the proposed development site and the SAC / SPA. Proposed development will connect to the Enniscrone foul and storm water sewers. No discharges to ground water or surface water.	No indirect impact on surface water quality either during construction or with subsequent habitation. No conduits between the proposed development site and the SAC / SPA. Proposed development will connect to the Enniscrone foul and storm water sewers. No discharges to ground water or surface water. No potential for indirect run off into the SAC or SPA with a 1.5M high concrete wall and the Cliff road separating the development site from the SAC / SPA area. No lentic or lotic freshwater systems within 100M of the development site boundary. The proposed construction area naturally complies with the IFI requirements for along stream works.
Potential Impacts on the Natura Sites Water resources	None – no abstraction from surface water or ground water. No drainage works proposed or required. No direct discharges to rivers, lakes, drain streams or ground water during or post construction.	None – no abstraction from surface water or ground water. No drainage works proposed or required.
Potential Impacts on the Natura Site from Light	No external light requirements during construction. Light during habitation will not be detectable in the SPA or SAC and will be completely adsorbed and assimilated into the Enniscrone Urban area. No requirement for additional street lighting.	No external light requirements during construction. Light during habitation will not be detectable in the SPA or SAC due to the development sites location in a street lit environment with no requirement for additional street lighting. The proposed project is not a noted source of light leakage. Lux levels will not be increased inside the IWEBS site OC455.
Potential Impacts on the Natura Sites from Noise	Impact Noise during the light construction works requires further consideration.	Post construction there will be no indirect impacts on the SAC QIS or SPA QIS either inside or outside of the natura sites boundaries. Post construction the proposed project will be completely absorbed and assimilated into the Enniscrone Urban area and undetectable within the boundary of the SAC or SPA.
Potential Impacts on the Natura Sites from Vibration	No impact as no significant vibration generating activity associated with the construction works i.e. vibration will be undetectable at a distance of <10M from the area of construction.	No indirect impact - absorbed into background. Post construction no vibration to consider

Potential Impacts on the Natura Sites from Compaction	SPA and SAC habitats or natura designated areas will not be subject to compaction – no activity within the SAC or SPA boundary with no requirement to enter or traverse the SPA or SAC.	SPA and SAC area will not be subject to compaction. None to consider outside of the development site boundary.
Potential Impacts on the Natura Sites from Traffic	Completely absorbed into the Enniscrone urban area back ground	During and post construction traffic movements will be completely absorbed into the Enniscrone Urban area back ground with no indirect impacts to consider.
Synergistic effects on the Natura Sites	No direct negative synergistic impacts on the SPA or SAC.	In combination impacts should be considered in the context of other plans or projects and the potential overlap or commonality of impact zones.
Introduction of extraneous material to the aquatic environment and / or qualifying habitats in the Natura Sites	No Potential for direct introduction of extraneous material in to the SAC or SPA Natura sites terrestrial or aquatic habitats. 1.5M high concrete wall and cliff road segregate the development site from the Natura sites.	No potential for the indirect introduction of extraneous material to the terrestrial or aquatic section of the SPA or SAC either during construction or with subsequent habitation. 1.5M high concrete wall and cliff road segregate the development site from the Natura sites. The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction.
Potential Impacts on the Natura Site – Use	The proposed project will not directly impact on the use of the SPA by the SCI species or the use of the SAC by the QIS post construction. The potential indirect impacts on the use of the SPA by the wintering SCI during the short duration heavier elements of construction can be negated by a precautionary mitigation measures	No Indirect impacts concerning use of the Natura site by the SAC QIS species – no negative impacts on surface water quality, light, noise, dust vibration not a consideration. The potential indirect impacts on the use of the SPA by the wintering SCI during the short duration heavier elements of construction can be negated by a precautionary mitigation measures.

Potential Impacts on Air quality in the Natura sites	No direct impacts on air quality within the natura sites are anticipated during construction or with subsequent use.	No potential indirect impacts during construction or with subsequent use. Not a noted source of dust. No emissions to air to consider. The values for SO ₂ (20µg/M ³ protection of vegetation) and NO + NO ₂ (30 µg/M ³ protection of ecosystems) will not be approached either by the construction and use of the proposed development when considered in isolation or in conjunction with other existing or proposed developments.
Climatic factors which may impact on the Natura sites	None – lack of scale and magnitude of the project.	None – lack of scale and magnitude of the project.
Interference with the key relationships that define the structure of the natura site	None - the habitats involved in the proposed project are a habitat on which the SPA SCI avian species or SAC QIS depend. No direct impact on water quality – SCI and QIS prey species not directly impacted. No ex situ use of development site by the SPA SCI species due to the urban street lit location which is subject to continual anthropogenic activity. No land take from the SPA or SAC, no entry into natura designated area, no material deposited in or removed from a natura site, no impact on surface or ground water quality, no increase in lux levels within a natura site, no impact on water resources, no requirement to enter or traverse a natura site, no impact on air quality in a natura site, no increase in noise levels within the natura site post construction.	No indirect interference with the key relationships that define the structure of the Natura sites. Disturbance of SPA SCI avian species to be considered during construction but not with subsequent habitation. No indirect interference with the key relationships that define the structure of the Natura site with respect to the SAC QIS or QIH.
Interference with the key relationships that define the function of the natura site.	No potential direct impact on surface water quality provided. SCI and QIS prey species will not be impacted with no deterioration in their habitat requirements. No extraneous material will enter a surface water feature or natura designated area. Timing of the project a consideration to ensure the SPA avian species are not impacted during construction.	No potential indirect impacts on the key relationships that define the function of the natura sites, no loss of QIS or SCI habitat requirements, surface water quality, either inside or outside the SAC or SPA, will not be impacted. Subsequent habitation not a consideration with respect to the SPA SCI species with precautionary mitigation measures required during construction to guarantee no impact on the SPA SCI. No ex situ use of development site by the SPA SCI species due to the urban street lit location which is subject to continual anthropogenic activity. No land take from the SPA or SAC, no entry into natura designated

		area, no material deposited in or removed from a natura site, no impact on surface or ground water quality, no increase in lux levels within a natura site, no impact on water resources, no requirement to enter or traverse a natura site, no impact on air quality in a natura site, no increase in noise levels within the natura site post construction
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2.1.3 Screening Conclusion

The screening assessment indicates that there is very limited tenuous potential for indirect impacts on the SPA Natura sites SCI species during construction which will require a very simple precautionary mitigation measures to obviate.

The potential for indirect impacts (disturbance of the SPA SCI avian species during construction from potential impact noise) have been considered and the scientific evidence indicates that a simple precautionary mitigation measure can be implemented to completely eliminate and negate that potential indirect impact in its entirety.

The development site is completely segregated from the SAC and SPA by the Cliff road and the 1.5M high concrete wall. Although the concrete wall is 1.5M high on the development site side it is significantly higher than that on the Natura site side, circa >3M.

There is no loss of qualifying interest habitats or designated area associated with the Natura sites and the proposed project is not located on an area that is classified as an undesignated QIH or a habitat on which the SCI or QIS are dependant. The QI habitats on which the SCI are dependant will not expand in range to encompass the proposed development site due to its street lit urban setting.

The SCI species for which the SPA was designated will not expand in range to include the proposed development site nor are they directly dependant on the habitat type present due to its urban street lit setting with continuous anthropogenic activity associated with the Enniscrone urban area.

None of the habitats on which the SAC QIS are dependant are located on the proposed development site and there will be no impact on the SAC QIS or QIH directly or indirectly either during construction or with subsequent habitation.

Although at this juncture it can be determined that the proposed project will not impact on the Killala Bay / Moy Estuary SAC QIS, QIH or conservation objectives it will be included in the further assessment under the precautionary principle and for the purposes of continuity.

All the other Natura sites within the 15Km of the development site are effectively screened out at this juncture as there are no direct or indirect links between the development site and those natura sites. There is no potential for ex situ use of the proposed development site by any of the qualifying interest species of the screened out natura sites, with none of their qualifying interest habitats are present. The development site is not visible from those Natura sites with no potential for their qualifying interests to expand in range such that they would encompass the proposed development site. The proposed development will not impact or contravene the Conservation Objectives for the Natura sites that were screened out as they are ecologically, geographically and hydro geologically isolated from the proposed development site.

As there is a potential indirect impact during construction that is unknown and mitigation measures will be required therefore in accordance with case law a stage 2 assessments is required.

Completed by: Paul Neary B.Sc. (Hns. Env. Sc.), M.Sc (eco. Tox)

Date: 10/10/25

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3.0 STAGE 2: NATURA IMPACT ASSESSMENT

3.1 Introduction:

The Natura Impact Statement (NIS) has been prepared in accordance with the current guidelines as prescribed by NPWS (NPWS, 2009, Revised February 2010), CIEEM 2018, OPR Practice Appropriate Assessment Screening for Development Management 2021 (Note PN01) and the EU guidance on the provisions of Article 6 of the 'Habitats' Directive (2018).

It provides a Natura impact assessment for the proposed project which involves the construction of 3 X 4 bed two and a half storey detached dwelling houses (1 X 190M², 1 X 177M² and 1 X 177M²), car park spaces, connection to all existing public services (Enniscrone town foul sewer D0102 (design p.e. 5,000, current loading 3,497p.e.), Enniscrone storm water sewer, electricity, telecoms, water) and all other ancillary site work and services on a brown field street lit urban infill site.

The West facing 0.239Ha urban street lit green field infill site is located in the Enniscrone urban area with an address at Cliff Road, Enniscrone, Co. Sligo. The site is located East of the Cliff Road, 216M North of Main street (R297) at grid reference 528667, 830114.

The NPWS have stated in the guidelines for "Appropriate Assessment of plans and projects in Ireland, Guidance for planning authorities" that *"There are no prescribed methods for undertaking appropriate assessment, or form or content for reporting and although there are some worked examples of formats that can be used"* (NPWS 2009 guidelines (revised 2010)). The NIS will provide the complete data, analysis and information for the Competent Authority in order to establish whether or not the proposed development is likely to have a significant impact on the Natura sites considered, and impart sufficient information to assist the competent authority in its decision-making process. Cognisance is taken of the Natura sites conservation objectives, supporting documentation, special conservation interests (SCI), habitats on which the SCI are dependant, the ex situ use of surrounding areas that the SCI utilise, the SAC qualifying interest habitats (QIH), the SAC qualifying interests species (QIS), the habitats and species on which the QIH and QIS depend both inside and outside of the SAC boundary and the Article 12 reports (2013-2018 / 2019 – 2024 unpublished). The Natura 2000 site on which the Stage 2 NIS is based is as follows.

(1) Killala Bay / Moy Estuary SAC 000458

(2) Killala Bay / Moy Estuary SPA 004036

The methodology employed in the Natura Impact Statement is cognisant of the EPA Advice Notes on Current Practice (2003); EPA 'Guidelines on the Information to be contained in Environmental Impact Statements' (2022), Guidelines on the information to be contained in EIARs (2022), the Institute of Ecology and Environmental Management's Guidelines for Ecological Impact Assessment (CIEEM, 2018) version 1.1 and with reference to the National Roads Authority Guidelines (NRA) for ecological impact assessment (Revision 2, 2009) and EU Guidance document: Managing Natura 2000 sites with reference to the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC version November 2018

The requirement for the NIS were determined by a stage 1 assessment which indicated that very limited elements of the proposed project may have likely or unknown indirect impacts requiring simple precautionary mitigation.

3.2 Qualifying Interests of the Natura 2000 Site(s) (from NPWS)

Killala Bay / Moy Estuary SAC 000458

Estuaries [1130]

Mudflats and sandflats not covered by seawater at low tide [1140]

Annual vegetation of drift lines [1210]

Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]

Salicornia and other annuals colonising mud and sand [1310]

Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330]

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]

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

Petromyzon marinus (Sea Lamprey) [1095]

Phoca vitulina (Harbour Seal) [1365]

Killala Bay / Moy Estuary SPA 004036

Special conservation Interests

Ringed Plover (*Charadrius hiaticula*) [A137]

Golden Plover (*Pluvialis apricaria*) [A140]

Grey Plover (*Pluvialis squatarola*) [A141]

Sanderling (*Calidris alba*) [A144]

Dunlin (*Calidris alpina*) [A149]

Bar-tailed Godwit (*Limosa lapponica*) [A157]

Curlew (*Numenius arquata*) [A160]

Redshank (*Tringa totanus*) [A162]

Wetland and Waterbirds [A999]

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3.3 Notable Features of the Natura 2000 Site(s) (From Natura 2000 Data Form)

Killala Bay / Moy Estuary SAC 000458 (Version: October 2020)

Other Site Characteristics

Situated on the north Mayo/Sligo coast, this large site comprises the inner part of Killala Bay, including the estuary of the River Moy from downstream of Ballina. The towns of Enniscrone and Killala occur on the eastern and western shores respectively. Sand dunes systems, estuaries and intertidal areas are the main habitats of the site. Bartragh Island, a sand bar on which a dune system has developed, stretches across most of the outer part of the site. A further dune system protrudes westwards from Enniscrone, while more dunes occur at the Ross peninsula in the north-west of the site. Other habitats present include salt marshes, dry grassland, reed beds and scrub.

Quality and importance

This large site displays an excellent diversity of dune types and is one of the most important dune systems in the north-west region. There remains a substantial area of intact fixed dune despite modifications to parts of the site for recreational and agricultural purposes. Some humid dune slacks also occur, and there are good and fairly extensive examples of shifting dunes with marram, embryonic shifting dunes and annual vegetation of driftlines. Salt marshes are well represented, with both Atlantic salt meadows and *Salicornia* types present. The Moy estuary is an important example of an estuary and has extensive intertidal sand and mud flats. Water quality is very good. The site is important for the occurrence of the Annex II mollusc *Vertigo angustior*, which occurs in marsh habitat. An excellent diversity of waterfowl winter at site, including two Annex I Bird Directive species (*Pluvialis apricaria*, *Limosa lapponica*). Seven other species winter in nationally important numbers, and in some winters internationally important concentrations of *Branta bernicla hrota* occur. Two Red Data plant species are known from site. The site supports an important population of *Phoca*

vitulina and both adult and juvenile *Petromyzon marinus*.

VULNERABILITY

NPWS Identified Negative Impacts on the Natura site			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i o b]
H	E01		b
H	G01.02		i
H	G02.02		b
H	G02.08		b
H	H01.08		b
L	F02.03		i
M	M01.03		i

Positive Impacts on the Natura site			
Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i o b]
H	J02.04		i

Rank: H = high, M = medium, L = low, Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification, T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions i = inside, o = outside, b = both

Ecological Information

Habitat types present on the site and assessment for them

Natura Site Assessment							
Code	Name	Cover [ha]	Data Quality	Representativity	Relative Surface	Conservation	Global
1130	Estuaries	736.9441	M	A	B	A	A
1140	Mudflats and sandflats not covered by seawater at low tide	1332.342	M	B	B	B	B

		vegetation of drift lines								
1230		Vegetated sea cliffs of the Atlantic and Baltic Coasts	27.35	G	A	C	A	A		
1310		Salicornia and other annuals colonizing mud and sand	0.545	M	B	C	B	B		
1330		Atlantic salt meadows (Glaucopuccinellietalia maritimae)	50.367	M	B	C	B	B		
2110		Embryonic shifting dunes	1.5552	M	B	C	B	B		
2120		Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")	12.7521	M	B	B	B	B		
2130		Fixed coastal dunes with herbaceous vegetation ("grey dunes")	259.452	M	B	B	B	B		
2190		Humid dune slacks	5.0879	M	B	C	B	B		

PF: For the habitat types that can have a non-priority as well as a priority form (6210, 7130, 9430) enter 'X' in the column PF to indicate the priority form.

NP: In case that a habitat type no longer exists in the site enter: x (optional)

Cover: Decimal values can be entered

Caves: For habitat types 8310, 8330 (caves) enter the number of caves if estimated surface is not available.

Data Quality: G = 'Good' (e.g. based on surveys), M = 'Moderate' (e.g. based on partial data with some extrapolation), P = 'Poor' (e.g. rough estimation)

Representativity: A = excellent representativity, B = good representativity, C = significant representativity, D = non-significant presence

Relative Surface: A = >15%, B = 2-15%, C = <2%

Conservation: A = excellent conservation, B = good conservation, C = average or reduced conservation

Global Assessment: A = excellent value, B = good value, C = significant value

Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC and site evaluation for them

Population in the site											
Group	Code	Scientific Name	Type	Size Min	Size Max	Unit	Data Quality	Population	Conservation	Isolation	Global
B	A052	Anas crecca	w	31	31	i	G	C	B	C	C
B	A050	Anas penelope	w	270	270	i	G	C	B	C	C

B	A053	Anas platyrhynchos	w	45	45	i	G	C	B	C	C
B	A169	Arenaria interpres	w	24	24	i	G	C	B	C	C
B	A046	Branta bernicla	w	166	166	i	G	C	B	C	B
B	A144	Calidris alba	w	135	135	i	G	B	A	C	A
B	A149	Calidris alpina	w	1816	1816	i	G	C	A	C	B
B	A143	Calidris canutus	w	429	429	i	G	C	A	C	B
B	A137	Charadrius hiaticula	w	207	207	i	G	B	A	C	B
B	A130	Haematopus ostralegus	w	463	463	i	G	C	B	C	C
B	A157	Limosa lapponica	w	309	309	i	G	C	A	C	B
B	A070	Mergus merganser	w	38	38	i	G	C	A	C	B
B	A160	Numenius arquata	w	555	555	i	G	C	B	C	C
B	A017	Phalacrocorax carbo	w	43	43	i	G	C	B	C	C
B	A140	Pluvialis apricaria	w	1303	1303	i	G	C	B	C	B
B	A141	Pluvialis squatarola	w	200	200	i	G	B	A	C	A
B	A048	Tadorna tadorna	w	81	81	i	G	C	B	C	C
B	A164	Tringa nebularia	w	19	19	i	G	B	A	C	B
B	A162	Tringa totanus	w	209	209	i	G	C	A	C	C
B	A142	Vanellus vanellus	w	899	899	i	G	C	B	C	B
F	1095	Petromyzon marinus	r				DD	C	C	C	C
I	1014	Vertigo angustior	p				DD	B	B	A	B
M	1365	Phoca vitulina	p	108	108	i	G	B	B	C	B

Group: A = Amphibians, B = Birds, F = Fish, I = Invertebrates, M = Mammals, P = Plants, R = Reptiles

S: In case that the data on species are sensitive and therefore have to be blocked for any public access enter: Yes

NP: In case that a species is no longer present in the site enter: x (optional)

Type: p = permanent, r = reproducing, c = concentration, w = wintering (for plant and non-migratory species use permanent)

Unit: i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)

Abundance Categories: C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information

Data Quality: G = 'Good' (e.g. based on surveys), M = 'Moderate' (e.g. based on partial data with some extrapolation), P = 'Poor' (e.g. rough estimation), VP = 'Very poor' (use this category only, if not even a rough estimation of the population size can be made, in this case the fields for population size can remain empty, but the field 'Abundance categories' has to be filled in)

Population: A = >15%, B = 2-15%, C = <2%, D = non-significant population

Conservation: A = excellent conservation, B = good conservation, C = average or reduced conservation

Isolation: A = population (almost) isolated, B = population not-isolated, but on the margins of are of distribution, C = population not-isolated withing extended distribution range

Global Assessment: A = excellent value, B = good value, C = significant value

Other important species of flora and fauna (optional)

Population in the site										
Group	Code	Scientific Name	Size Min	Size Max	Species Annex IV	Species Annex V	Other Cat. A	Other Cat. B	Other Cat. C	Other Cat. D
F	5704	Liza ramada								x
I		Ashfordia granulata								x
P		Draba incana					x			
P		Groenlandia densa					x			

Group: A = Amphibians, B = Birds, F = Fish, Fu = Fungi, I = Invertebrates, L = Lichens, M = Mammals, P = Plants, R = Reptiles

Code: For Birds, Annex IV and V species the code as provided in the reference portal should be used in addition to the scientific name

S: In case that the data on species are sensitive and therefore have to be blocked for any public access enter: Yes

NP: In case that a species is no longer present in the site enter: x (optional)

Unit: i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)

Abundance Categories: C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information

Motivation Categories: IV, V: Annex Species (Habitats Directive), A: National Red List data, B: Endemics, C: International Conventions, D: other reasons

Site Description General site character

Code	Habitat Class	Cover [%]
N03	Salt marshes, Salt pastures, Salt steppes	1
N06	Inland water bodies (Standing water, Running water)	1

N07	Bogs, Marshes, Water fringed vegetation, Fens	1
N19	Mixed woodland	1
N08	Heath, Scrub, Maquis and Garrigue, Phygrana	1
N09	Dry grassland, Steppes	1
N14	Improved grassland	1
N05	Shingle, Sea cliffs, Islets	2
N04	Coastal sand dunes, Sand beaches, Machair	11
N02	Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	80
	Total Habitat Cover	100

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Killala Bay / Moy Estuary SPA 004036 (Version: October 2020)

Other Site Characteristics

This large site comprises the inner, estuarine part of Killala Bay, at the mouth of the River Moy. It is a funnel-shaped estuary that is approximately 7 km wide at its outer limit. The site is well-sheltered by a sandy island, Bartragh Island, that extends across much of the outer part, and by a sandy peninsula which extends from Enniscrone on the eastern side. Extensive intertidal sand and mud flats are exposed at low tide. Salt marshes skirt part of the intertidal flats.

Quality and importance

This site is a fine example of an estuarine system in a natural state. It supports an excellent diversity of wintering waterfowl and is one of the most important sites in the region. Six of the species have populations of national importance: *Limosa lapponica*, *Charadrius hiaticula*, *Pluvialis squatarola*, *Calidris alba*, *Calidris canutus* and *Calidris alpina*. *Pluvialis apricaria* also occurs in numbers close to national importance. There is a regular population of *Branta bernicla hrota* which in some winters exceeds the threshold for international importance. *Gavia stellata* is regular within the site. The Red Data Book species *Groenlandia densa* occurs in the site.

VULNERABILITY

Threats, pressures and activities with impacts on the site

The most important impacts and activities with high effect on the site are listed in the following tables.

Negative Impacts on the Natura site			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i/o b]
M	F02.03		i
M	A08		o

M	E01		o
M	G01.02		i

Positive Impacts on the Natura site

Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i o b]
M	F02.03		i

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Rank: H = high, M = medium, L = low, Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification, T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions i = inside, o = outside, b = both

Ecological Information

Species present on the Natura site and assessment for them

Populations in the Natura site											
Group	Code	Scientific Name	Type	Size Min	Size Max	Unit	Data Quality	Population	Conservation	Isolation	Global
B	A052	Anas crecca	w	173	173	i	G	C	B	C	C
B	A050	Anas penelope	w	234	234	i	G	C	B	C	C
B	A053	Anas platyrhynchos	w	58	58	i	G	C	B	C	C
B	A169	Arenaria interpres	w	32	32	i	G	C	B	C	C
B	A046	Branta bernicla	w	157	157	i	G	C	B	C	C
B	A144	Calidris alba	w	118	118	i	G	C	A	C	B
B	A149	Calidris alpina	w	1741	1741	i	G	C	A	C	B
B	A149	Calidris alpina	w	22	22	i	G	C	B	C	C
B	A143	Calidris canutus	w	329	329	i	G	C	A	C	B
B	A137	Charadrius hiaticula	w	185	185	i	G	C	A	C	B
B	A001	Gavia stellata	w	11	11	i	G	C	B	C	C

B	A130	Haematopus ostralegus	w	450	450	i	G	C	B	C	C
B	A182	Larus canus	w	260	260	i	G	C	B	C	C
B	A179	Larus ridibundus	w	283	283	i	G	C	B	C	C
B	A157	Limosa lapponica	w	335	335	i	G	C	A	C	B
B	A069	Mergus serrator	w	33	33	i	G	C	A	C	B
B	A160	Numenius arquata	w	561	561	i	G	C	B	C	C
B	A140	Pluvialis apricaria	w	1396	1396	i	G	C	B	C	C
B	A141	Pluvialis squatarola	w	183	183	i	G	B	A	C	A
B	A048	Tadorna tadorna	w	63	63	i	G	C	B	C	C
B	A164	Tringa nebularia	w	15	15	i	G	C	A	C	C
B	A162	Tringa totanus	w	300	300	i	M	C	A	C	B
B	A142	Vanellus vanellus	w	1386	1386	i	G	C	B	C	C

Group: A = Amphibians, B = Birds, F = Fish, I = Invertebrates, M = Mammals, P = Plants, R = Reptiles

S: In case that the data on species are sensitive and therefore have to be blocked for any public access enter: Yes

NP: In case that a species is no longer present in the site enter: x (optional)

Type: p = permanent, r = reproducing, c = concentration, w = wintering (for plant and non-migratory species use permanent)

Unit: i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)

Abundance Categories: C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information

Data Quality: G = 'Good' (e.g. based on surveys), M = 'Moderate' (e.g. based on partial data with some extrapolation), P = 'Poor' (e.g. rough estimation), VP = 'Very poor' (use this category only, if not even a rough estimation of the population size can be made, in this case the fields for population size can remain empty, but the field 'Abundance categories' has to be filled in)

Population: A = >15%, B = 2-15%, C = <2%, D = non-significant population

Conservation: A = excellent conservation, B = good conservation, C = average or reduced conservation

Isolation: A = population (almost) isolated, B = population not-isolated, but on the margins of are of distribution, C = population not-isolated withing extended distribution range

Global Assessment: A = excellent value, B = good value, C = significant value

Other important species of flora and fauna (optional)

Population in the site

Group	Code	Scientific Name	Size Min	Size Max	Unit	Species Annex IV	Species Annex V	Other Cat. A	Other Cat. B	Other Cat. C	Other Cat. D
B	A028	Ardea cinerea	11	11	i					x	
B	A184	Larus argentatus	292	292	i						x
B	A187	Larus marinus	101	101	i						x
P		Groenlandia densa						x			

: A = Amphibians, B = Birds, F = Fish, Fu = Fungi, I = Invertebrates, L = Lichens, M = Mammals, P = Plants, R = Reptiles

Code: For Birds, Annex IV and V species the code as provided in the reference portal should be used in addition to the scientific name

S: In case that the data on species are sensitive and therefore have to be blocked for any public access enter: Yes

NP: In case that a species is no longer present in the site enter: x (optional)

Unit: i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)

Abundance Categories: C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information

Motivation Categories: IV, V: Annex Species (Habitats Directive), A: National Red List data, B: Endemics, C: International Conventions, D: other reasons

General site character

Code	Total Area 3,202.02Ha Habitat Class	Cover [%]
N04	Coastal sand dunes, Sand beaches, Machair	1
N05	Shingle, Sea cliffs, Islets	1
N03	Salt marshes, Salt pastures, Salt steppes	2
N02	Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	96
	Total Habitat Cover	100

3.4 Conservation Objectives (From NPWS)

The Detailed Conservation Objectives and Supporting Documents are also available for reference on the NPWS Web site.

Killala Bay/Moy Estuary SAC 000458

Conservation Objectives Series Version Date: October 31/10/2012

European and national legislation places a collective obligation on Ireland and its citizens to maintain habitats and species in the Natura 2000 network at favourable conservation condition. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites. A site specific conservation objective aims to define favourable conservation condition for a particular habitat or species at that site.

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.

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.

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them. These two designations are collectively known as the Natura 2000 network.

The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.

Killala Bay/Moy Estuary SAC 000458 Conservation Objectives Series October 31/10/2012

1014 Narrow mouthed Whorl Snail *Vertigo angustior*

To maintain the favourable conservation condition of Narrow mouthed Whorl Snail in Killala

1095 Sea Lamprey *Petromyzon marinus*

To maintain the favourable conservation condition of Sea Lamprey in Killala Bay/Moy Estuary SAC.

1130 Estuaries

To maintain the favourable conservation condition of Estuaries in Killala Bay/Moy Estuary SAC,

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 Killala Bay/Moy Estuary SAC.

1210 Annual vegetation of drift lines

To maintain the favourable conservation condition of Annual vegetation of drift lines in Killala Bay/Moy Estuary SAC,

1310 Salicornia and other annuals colonizing mud and sand

To maintain the favourable conservation condition of Salicornia and other annuals colonizing mud and sand in Killala Bay/Moy Estuary SAC

1310 Salicornia and other annuals colonizing mud and sand

To maintain the favourable conservation condition of Salicornia and other annuals colonizing mud and sand in Killala Bay/Moy Estuary SAC

1330 Atlantic salt meadows (*Glauco Puccinellietalia maritimae*)

To maintain the favourable conservation condition of Atlantic salt meadows (<i>Glauco Puccinellietalia</i>) in Killala Bay/Moy Estuary SAC
1330 Atlantic salt meadows (<i>Glauco Puccinellietalia maritimae</i>) To maintain the favourable conservation condition of Atlantic salt meadows (<i>Glauco Puccinellietalia</i>) in Killala Bay/Moy Estuary SAC
1365 Harbour Seal <i>Phoca vitulina</i> To maintain the favourable conservation condition of Harbour Seal in Killala Bay/Moy Estuary SAC
2110 Embryonic shifting dunes To restore the favourable conservation condition of Embryonic shifting dunes in Killala Bay/Moy Estuary SAC
2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes') To restore the favourable conservation condition of Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) in Killala Bay/Moy Estuary SAC
2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes') To restore the favourable conservation condition of Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) in Killala Bay/Moy Estuary SAC
2130 *Fixed coastal dunes with herbaceous vegetation ('grey dunes') To restore the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation (grey dunes)
2130 *Fixed coastal dunes with herbaceous vegetation ('grey dunes') To restore the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation (grey dunes) in Killala Bay/Moy Estuary SAC
2190 Humid dune slacks To maintain the favourable conservation condition of Humid dune slacks in Killala Bay/Moy Estuary SAC
2190 Humid dune slacks To maintain the favourable conservation condition of Humid dune slacks in Killala Bay/Moy Estuary SAC

SITE NAME: KILLALA BAY/MOY ESTUARY SPA 004036

Conservation Objectives Version Date: 28 May 2013

European and national legislation places a collective obligation on Ireland and its citizens to maintain habitats and species

in the Natura 2000 network at favourable conservation condition. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites.

A site-specific conservation objective aims to define favourable conservation condition for a particular habitat or species at that site.

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.

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.

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them. These two designations are collectively known as the Natura 2000 network.

The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level

Killala Bay/Moy Estuary SPA 004036 Conservation Objectives Series October 28/05/13	
A137 Ringed Plover <i>Charadrius hiaticula</i>	To maintain the favourable conservation condition of Ringed Plover in Killala Bay/Moy Estuary SPA
A140 Golden Plover <i>Pluvialis apricaria</i>	To maintain the favourable conservation condition of Golden Plover in Killala Bay/Moy Estuary SPA
A141 Grey Plover <i>Pluvialis squatarola</i>	To maintain the favourable conservation condition of Grey Plover in Killala Bay/Moy Estuary SPA
A144 Sanderling <i>Calidris alba</i>	To maintain the favourable conservation condition of Sanderling in Killala Bay/Moy Estuary SPA
A149 Dunlin <i>Calidris alpina alpina</i>	To maintain the favourable conservation condition of Dunlin in Killala Bay/Moy Estuary SPA
A157 Bar-tailed Godwit <i>Limosa lapponica</i>	To maintain the favourable conservation condition of Bar-tailed Godwit in Killala Bay/Moy Estuary SPA
A160 Curlew <i>Numenius arquata</i>	To maintain the favourable conservation condition of Curlew in Killala Bay/Moy Estuary SPA

A162 Redshank *Tringa totanus*

To maintain the favourable conservation condition of Redshank in Killala Bay/Moy Estuary SPA

A999 Wetlands

To maintain the favourable conservation condition of wetland habitat in Killala Bay/Moy Estuary SPA as a resource for the regularly occurring migratory waterbirds that utilise it. The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 3,204 hectares, other than that occurring from natural patterns of variation. The wetland habitat area was estimated as 3,204ha using OSi data and relevant orthophotographs. For further information see part three of the conservation objectives supporting document

The Detailed Conservation Objectives and Supporting Documents are available for reference on the NPWS Web site.

3.5 Individual Elements of the project likely to give rise to impacts on the Natura 2000 site.

The individual elements of the project likely to give rise to impacts or where the impacts are uncertain are listed below.

Element	Potential Impact	Potential Requirement for Mitigation Measures
Site set up and establishment –	None – limited set up required due to small scale of project with no compound, site break in required.	None
Marking out of site services on the ground.	None – low level activity with no potential impacts	None
Site clearance	Potential impacts (i) Noise and movement of plant (ii) Dust generation (iii) Vibration (iv) Clearance of vegetation (v) Management of soil and sub soils (vi) Hydrocarbon management (vii) Maintenance of plant	The Proposed activity naturally complies with the Inland Fisheries Ireland document “ <i>Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites</i> ”. Top and Sub soil will be reworked within the site with excess removed off site by a license hauler to a licensed facility for recycling / disposal. No significant vegetation removal is required. Timing of project to will completely negate any and all the potential impacts regarding potential disturbance of the wintering only SPA avian species utilizing the IWEBS sub site OC 455 to the West. The proposed project is not a noted

		source of significant fugitive dust (bergerhoff limits of 350mg/M²/d will not be exceeded as measures at the site boundary.) Vibration from all site activities will be undetectable in the Natura sites. For security reasons the heavy plant refuelling hydrocarbons for small scale projects are not stored on site (potential theft) which shall be reinforced through a planning permission conditioned legally enforceable mitigation measures. For logistical reasons plant maintenance is carried out prior to entry to sites and only locally sourced plant is normally employed on such small scale projects. Timing of proposed element to coincide with a period when the SPA SCI avian species are not present within the SPA will completely negate any unknown impacts with respect to disturbance. The development site is not located within or contiguous to a natura site with no potential land take from any Natura site. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA. There are no surface water features connecting the development site to the SAC or SPA.
Set up of Construction area	Potential impacts (i) Location of storage of aggregates and other related construction material, mixing pad etc.	Construction related aggregates and materials will only be stored adjacent the construction area and >30M from the natura sites and any surface water feature which exceeds the Fisheries Board document “<i>Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites</i>”. The site is completely segregated from the SAC and SPA by the Cliff Road and a 1.5M high concrete wall which dictates that no construction related material can egress to the SAC or SPA. The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban

		environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction. The volume of concrete and aggregate that are to be used is extremely small in terms of construction sites and for practical reasons the mixing pad will be located as close to the area of construction as possible and located to the south of the area of construction which is >30M from the SAC and SPA. Any activity involving the mixing concrete is only carried out during relatively dry weather and never during periods of frost or heavy rain for structural reasons. Once cured concrete is inert and immobile and in normal circumstances goes off in less than 24Hrs (<3Hrs for water proof skin) consequently there is no potential for material from the mixing pad to enter the SAC or SPA as it becomes immobile in soils. For economic and practical reasons all other construction related materials are stored internally to prevent accidental damage due to the potential for economic loss. Timing of the heavier elements of the proposed project to coincide with a period when the SPA SCI avian species are not present will completely negate any unknown potential disturbance impacts.
Construction Related Activities and Materials	Potential impacts. (i) Storage of construction related compounds (aggregates, mortar mix, cement, lime, bonding, etc.), (ii) Hydrocarbon management (storage), (iii) waste packaging, waste construction materials, storage of construction related materials, delivery of construction related materials etc. (iv) Introduction of invasive / alien species and disease. (v) Suspended solids to the Ballyglass River during lane construction (vi) Introduction of invasive species through the importation of aggregates.	Dwelling construction related materials will only be stored adjacent to the construction area which is >30M from any surface water feature which exceeds the Fisheries Board document <i>“Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites”</i>. All other construction related materials and compounds will only be stored adjacent to the construction area for practical reasons. Standard practice is to store these materials internally in a suitable container to prevent accidental damage or loss due to the associated economic implications. Waste packaging material and construction materials are generally stored in appropriate containers for appropriate disposal which is standard common practice. For security reasons heavy plant refuelling hydrocarbons are not stored on small construction sites with refuelling only occurring as required due to the potential for theft. Delivery of the construction material is normally as required and their storage will be located adjacent to the construction area and >30M from the SAC / SPA boundary. The impacts will be localised and confined to within the development site boundary.

		Timing of proposed heavier element to coincide with a period when the SPA SCI avian species are not present will completely negate any unknown or potential impacts on those species either inside or outside of the SPA boundary. No importation of soil or sub soil is required or proposed. The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA. There are no surface water features connecting the development site to the SAC or SPA.
Digging / Pouring of foundations and general groundwork's	Potential impacts (i) Noise and movement of heavy plant (ii) Cementitious material (iii) Dust (iv) Vibration (v) Soil and Sub soil management (vi) maintenance of plant (vii) Hydrocarbon management	Timing of the heavier elements of the proposed project to coincide with a period when the SPA SCI avian species are not present will completely negate any unknown or potential impacts on those species either inside or outside of the SPA boundary with respect to disturbance. The volume of concrete to be used in the foundations is small in terms of construction sites. Once cured concrete is inert and immobile and in normal circumstances the outer layers goes off in less than 24Hrs after pouring (<3Hrs water proof skin). The method of construction requires the use of forms and shuttering which prevents the concrete from leaching from the construction area as that would compromise the structural integrity. The process of pouring foundations is never undertaken during periods of rainfall or during frosts which naturally complies with the Fisheries Board document <i>"Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites"</i>. Batch concrete trucks will not wash out the drum on site, this is

		industry standard in the aggregates and extractive industry (potential liability) and shall be reinforced through mitigation measures. Vibration and fugitive dust from construction will be absorbed into the back ground with no impact on the SPA or SAC. The impact will be localised and confined to within the development site boundary. For security reasons hydrocarbons for small scale projects are not stored on site and for logistical reasons plant maintenance is carried out prior to entry to sites with only locally sourced plant employed. Mitigation measures shall guarantee that the project does not impact on surface water quality. The main elements of the proposed project can be confined to the summer and will coincide with a period when the SPA QI wintering species are not present. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natural site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA. There are no surface water features connecting the development site to the SAC or SPA. The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction
Block work	Potential indirect impacts (i) cementitious material (ii) Storage of aggregates (iii) Concrete mixing pad location	For practical reasons the mixing pad will be located as close to the area of construction as possible and not within >30M of the SAC and SPA boundary. Any activity involving the mixing of render or concrete is normally only carried out during relatively dry weather and never during periods of frost for structural reasons. Once cured concrete is chemically inert and immobile and in normal circumstances goes off in less than 24Hrs (<3hrs to water proof skin) consequently there is

		no potential for material from the mixing pad to enter the SAC or SPA. Construction related aggregates will only be stored adjacent to the construction area >30M from any surface water feature which exceeds the Fisheries Board document “<i>Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites</i>”. The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA. There are no surface water features connecting the development site to the SAC or SPA.
Roofing	Short Duration low level activity – minor impact noise	Timing of project to ensure no impact on SPA species either inside or outside the SPA boundary. No impact on the SAC QIS or QIH.
Windows and doors	Low level activity with no potential for significant or insignificant impacts directly or indirectly.	No Mitigation require as no potential for direct or indirect impacts on the SPA or SAC conservation objectives, QIS, QIH or SCI either inside or outside of the SAC and SPA boundaries.
First fix electrical, plumbing and carpentry	None – none required or proposed	None – none required or proposed
Internal plastering	None – none required or proposed	None – none required or proposed
Second fix electrical, plumbing and carpentry	None – none required or proposed	None – none required or proposed

Finishing external groundwork	Low level activity with no potential for significant or insignificant impacts directly or indirectly	No specific mitigation measures required.
Commissioning and decorating	None – none required or proposed	None – none required or proposed
Landscaping	None – none required or proposed	The European Communities (Birds and Natural Habitats) Regulations 2011 address the problem of invasive species. A black list of unwanted species is set out in the Regulations. It will be an offence without a license, to release or allow to disperse or escape, to breed, propagate, import, transport, sell or advertise such species. The two regulations that deal specifically with these scheduled lists of species are Article 49 which prohibits the introduction, breeding, release or dispersal of certain species and Article 50 which prohibits dealing in and keeping certain species. Consequently no invasive species will be introduced to the site through landscaping.
Lighting	Light leakage.	The proposed project is not a noted source of light leakage and there will be no increase in lux levels within the SPA or SAC. The proposed urban development site is already street lit with no additional street lighting required.

3.6 NPWS identified Threats, Pressures and Activities with Negative Impacts on the Natura Site (Natura Data Form and Article 12) and relevance of the proposed project.

The following matrix indicates the threats, pressures and activities which NPWS have identified as having significant negative impacts on the Natura sites. The relevance to the proposed project is also indicated.

Killala Bay / Moy Estuary SAC 000458 NPWS Identified Significant Negative Impacts				
Rank	Threats and pressures [code]	Description	Inside/outside /both [i o b]	Impact Prediction / Synergistic Effects from the proposed project
H	E01	Urbanised areas, human habitation	b	No expansion of the Enniscrone urban area, no additional roads infrastructure required, no increase lux levels in the area, UWWTP has excess capacity to cater for development. No detectable increase in anthropogenic activity. Habitation absorbed and assimilated into back ground.
H	G01.02	walking, horse riding and non-motorised vehicles	i	Not Associated with the project
H	G02.02	skiing complex	b	Not Associated with the project
H	G02.08	camping and caravans	b	Not Associated with the project
H	H01.08	Diffuse pollution to surface waters due to household sewage and waste waters	b	Not Associated with the project
L	F02.03	Leisure fishing	i	Not Associated with the project
M	M01.03	flooding and rising precipitations	i	Not Associated with the project

Killala Bay / Moy Estuary SPA 004036 NPWS Identified Significant Negative Impacts				
Rank	Threats and pressures [code]	Description	Inside/outside /both [i o b]	Impact Prediction / Synergistic Effects from the proposed project
M	F02.03	Leisure fishing	i	Not Associated with the project
M	A08	Fertilisation	o	Not Associated with the project
M	E01	Urbanised areas, human habitation	o	No expansion of the Enniscrone urban area, no additional roads infrastructure required, no increase lux levels in the area, UWWTP has excess capacity to cater for development. No detectable increase in anthropogenic activity. Habitation absorbed and assimilated into back ground.
M	G01.03	motorised vehicles	i	Not Associated with the project

From the tables above it can be seen that the proposed project has no reasonable or realistic significant potential to permanently exacerbate or increase those threats and pressures identified by NPWS as having significant impacts on the SPA or SAC. The impacts on the SPA and SAC, as identified by NPWS, are largely not relevant to the proposed project. The table indicates that only one potential medium to high negative impact on the Standard Natura Data Form for the Killala Bay / Moy Estuary SAC 000458 and Killala Bay / Moy Estuary SPA 004036 is relevant, E01 Urbanised areas, human habitation; however the proposed development site is located within the urban street lit Enniscrone town area which is subject to continuous anthropogenic activity and dictates that the proposed project will be completely assimilated and absorbed into the background.

The following matrix indicates the threats, pressures and activities which the 2019 Article 12 report identified as having significant negative impacts on the Natura site. The relevance to the proposed project is also indicated.

SPA SCI Species Article 12 Report (2012 – 2018) for the Killala Bay / Moy Estuary SPA 004036				
Special Conservation Interest	Status	Threats and Pressures	Conservation Measures	Impact of Proposed project
Ringed Plover		F07 - Sports,	The measures listed below	The proposed project will

(<i>Charadrius hiaticula</i>) [A137] Wintering Only No breeding.	Population Short Term trend 2004 – 2016 Decreasing Long Term Trend 1987-2016 Increasing	tourism and leisure activities M - medium importance inside the Member State G19 - Other impacts from marine aquaculture, including infrastructure M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside the Member State F08 - Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defenses or coastal protection works and infrastructures) M - medium importance inside the Member State	have been identified but not yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities CG09 - Other measures to reduce impacts from marine aquaculture infrastructures and operation CG09: The main regulatory measure taken has been the implementation of appropriate assessment to ensure that potential threats from development activities, within and outside of the Natura 2000 network, do not negatively impact on the conservation objectives of designated sites. This includes the assessment of planned aquaculture on a bay by bay basis.	not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.
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		N04 - Sea-level and wave exposure changes due to climate change M - medium importance inside the Member State		
Golden Plover <i>(Pluvialis apricaria)</i> [A140] Wintering Only No breeding.	<u>Population</u> Short Term trend 2004 – 2016 Decreasing Long Term Trend 1987-2016 Unknown	G07 - Hunting M - medium importance inside the Member State N01 - Temperature changes (e.g. rise of temperature & extremes) due to climate change M - medium importance both inside and outside EU D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside the Member State F07 - Sports, tourism and leisure activities M - medium importance inside the Member State F28 - Modification of flooding regimes, flood protection for residential or recreational development	The measures listed below have been identified but not yet taken to any significant degree: CG02 - Management of hunting, recreational fishing and recreational or commercial harvesting or collection of plants CN01 - Adopt climate change mitigation measures CN02 - Implement climate change adaptation measures	The proposed project will not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.

		M -medium importance inside the Member State		
Grey Plover (Pluvialis squatarola) [A141] Wintering Only No breeding.	Population Short Term trend 2004 – 2016 Decreasing Long Term Trend 1987- 2016 Decreasing	F07 - Sports, tourism and leisure activities M - medium importance inside the Member State G01 - Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and disturbance of species - medium importance inside the Member State G19 - Other impacts from marine aquaculture, including infrastructure M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance - inside the Member State N04 - Sea-level and	The measures listed below have been identified but not yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities CG01 - Management of professional/commercial fishing (including shellfish and seaweed harvesting) CG09 - Other measures to reduce impacts from marine aquaculture infrastructures and operation CG09: The main regulatory measure taken has been the implementation of appropriate assessment to ensure that potential threats from development activities, within and outside of the Natura 2000 network, do not negatively impact on the conservation objectives of designated sites. This includes the assessment of planned aquaculture on a bay by bay basis.	The proposed project will not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures withier implemented or proposed.

		wave exposure changes due to climate change M - medium importance inside the Member State		
Sanderling (<i>Calidris alba</i>) [A144] Wintering Only No breeding.	Population Short Term trend 2004 – 2016 Stable Long Term Trend 1987-2016 Increasing	F07 - Sports, tourism and leisure activities M - medium importance inside the Member State G01 - Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and disturbance of species M - medium importance - inside the Member State G19 - Other impacts from marine aquaculture, including infrastructure M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside	The measures listed below have been identified but not yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities CG01 - Management of professional/commercial fishing (including shellfish and seaweed harvesting) CG09 - Other measures to reduce impacts from marine aquaculture infrastructures and operation CG09: The main regulatory measure taken has been the implementation of appropriate assessment to ensure that potential threats from development activities, within and outside of the Natura 2000 network, do not negatively impact on the conservation objectives of designated sites. This includes the assessment of planned aquaculture on a bay by bay basis.	The proposed project will not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.

		the Member State F08 - Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defenses or coastal protection works and infrastructures M - medium importance inside the Member State N04 - Sea-level and wave exposure changes due to climate change M - medium importance inside the Member State		RECEIVED: 30/10/2025
Dunlin (<i>Calidris alpina</i>) [A149] Wintering Only No breeding.	Population Short Term trend 2004 – 2016 Decreasing Long Term Trend 1987-2016 Decreasing	F07 - Sports, tourism and leisure activities M - medium importance inside the Member State G01 - Marine fish and shellfish harvesting (professional, recreational) causing reduction of	The measures listed below have been identified but not yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities CG01 - Management of professional/commercial fishing (including shellfish and seaweed harvesting) CG09 - Other measures to reduce impacts from	The proposed project will not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.

		species/prey populations and disturbance of species M - medium importance inside the Member State G19 - Other impacts from marine aquaculture, including infrastructure M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside the Member State F08 - Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defenses or coastal protection works and infrastructures) M - medium importance inside the Member State	marine aquaculture infrastructures and operation CG09: The main regulatory measure taken has been the implementation of appropriate assessment to ensure that potential threats from development activities, within and outside of the Natura 2000 network, do not negatively impact on the conservation objectives of designated sites. This includes the assessment of planned aquaculture on a bay by bay basis.	
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		N04 - Sea-level and wave exposure changes due to climate change M - medium importance - inside the Member State		
Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wintering Only No breeding.	Population Short Term trend 2004 – 2016 Stable Long Term Trend 1987-2016 Decreasing	Wintering distribution entirely coastal. They are largely confined to estuaries, with largest numbers recorded on sandy estuaries. Small numbers recorded using non-estuarine coastline. F07 - Sports, tourism and leisure activities M - medium importance inside the Member State G19 - Other impacts from marine aquaculture, including infrastructure M - medium importance inside the Member State G01 - Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and	The measures listed below have been identified but not yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities CG01 - Management of professional/commercial fishing (including shellfish and seaweed harvesting) CG09 - Other measures to reduce impacts from marine aquaculture infrastructures and operation CG09: The main regulatory measure taken has been the implementation of appropriate assessment to ensure that potential threats from development activities, within and outside of the Natura 2000 network, do not negatively impact on the conservation objectives of designated sites. This includes the assessment of planned aquaculture on a bay by bay basis.	The proposed project will not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.

		disturbance of species M - medium importance inside the Member State F08 - Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defenses or coastal protection works and infrastructures) M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside the Member State N04 - Sea-level and wave exposure changes due to climate change M - medium importance inside the Member State		RECEIVED: 30/10/2025
Curlew (<i>Numenius</i>	<u>Population</u> Short Term	F07 - Sports, tourism and leisure	The measures listed below have been identified but not	The proposed project will not impact or exacerbate

<i>arquata</i>) [A160] Wintering Only No breeding.	trend 2005 – 2015 Decreasing Long Term Trend 1986–2015 Decreasing	activities M - medium importance inside the Member State G01 - Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and disturbance of species M - medium importance inside the Member State G19 - Other impacts from marine aquaculture, including infrastructure M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside the Member State F08 - Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial,	yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities CG01 - Management of professional/commercial fishing (including shellfish and seaweed harvesting) CG09 - Other measures to reduce impacts from marine aquaculture infrastructures and operation CG09: The main regulatory measure taken has been the implementation of appropriate assessment to ensure that potential threats from development activities, within and outside of the Natura 2000 network, do not negatively impact on the conservation objectives of designated sites. This includes the assessment of planned aquaculture on a bay by bay basis.	any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.
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		industrial and recreational infrastructure and areas (including sea defenses or coastal protection works and infrastructures) M - medium importance - inside the Member State		RECEIVED: 30/10/2025
<i>Redshank (Tringa totanus) [A162]</i> Wintering Only No breeding.	Population Short Term trend 2004 – 2016 Decreasing Long Term Trend 1987-2016 Increasing	F07 - Sports, tourism and leisure activities M - medium importance inside the Member State D01 - Wind, wave and tidal power, including infrastructure M - medium importance inside the Member State F08 - Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defenses or coastal protection works and infrastructures) M - medium importance - inside the Member State	The measures listed below have been identified but not yet taken to any significant degree: CF03 - Reduce impact of outdoor sports, leisure and recreational activities	The proposed project will not impact or exacerbate any of the threats or pressures identified on the Article 12 report nor will it have any impact on the conservation measures wither implemented or proposed.

		N04 - Sea-level and wave exposure changes due to climate change M - medium importance inside the Member State		
Wetlands	N/A	N/A	N/A	No wetlands on wet lands – none on or contiguous to the development site. No entry to, traversing, material deposited in or removed from any wetlands.

The following matrix indicates the threats, pressures and activities which the 2019 Article 17 reports (vol. 1 &2) have identified as having significant negative impacts on the Natura sites qualifying habitats and species. The relevance to the proposed project is also indicated.

Killala Bay / Moy Estuary SAC 000458 Qualifying Interests	Article 17 Overall Status Assessment	Article 17 Report Threats to Qualifying Interest	Article 17 Report Pressures on Qualifying Interests	Conservation Measures and Impact of Proposed Project on Article 17 identified Threats and Pressures
<i>Petromyzon marinus</i> [1095]	Bad	<u>D02</u> Hydropower (dams, weirs, run-off-the-river), including infrastructure (H) <u>N03</u> Increases or changes in precipitation due to climate change (H) <u>A19</u> Application of natural fertilisers on agricultural land (M) <u>A20</u> Application of synthetic (mineral) fertilisers on agricultural land (M) <u>A31</u> Drainage for use as agricultural land	<u>D02</u> Hydropower (dams, weirs, run-off-the-river), including infrastructure (H) <u>N03</u> Increases or changes in precipitation due to climate change (H) <u>A19</u> Application of natural fertilisers on agricultural land (M) <u>A20</u> Application of synthetic (mineral) fertilisers on agricultural land (M) <u>A31</u> Drainage for use as agricultural land (M) <u>G01</u> Marine fish and shellfish harvesting	The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.

		(M) G01 Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations (M) Xo Threats and pressures from outside the Member State (M) N01 Temperature changes (e.g. rise of temperature & extremes) due to climate change (M) N02 Droughts and decreases in precipitation due to climate change (M)	(professional, recreational) causing reduction of species/prey populations (M) Xo Threats and pressures from outside the Member State (M)	
<i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]	Inadequate	A06 Abandonment of grassland management (e.g. cessation of grazing or of mowing) (H) A10 Extensive grazing or undergrazing by livestock (H) F07 Sports, tourism and leisure activities (M) F05 Creation or development of sports, tourism and leisure infrastructure (outside the urban or recreational areas) (M)	A06 Abandonment of grassland management (e.g. cessation of grazing or of mowing) (H) A10 Extensive grazing or undergrazing by livestock (H) F07 Sports, tourism and leisure activities (M) F05 Creation or development of sports, tourism and leisure infrastructure (outside the urban or recreational areas) (M)	The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.
Humid dune slacks [2190]	Inadequate	A19 Application of natural fertilisers on agricultural land (M) A31 Drainage for use as agricultural land	A19 Application of natural fertilisers on agricultural land (M) A31 Drainage for use as agricultural land (M) F07 Sports, tourism and	CA03 Maintain existing extensive agricultural practices and agricultural landscape features The proposed project does not

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		(M) F07 Sports, tourism and leisure activities (M) I02 Other invasive alien species (other than species of Union concern) (M) L02 Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	leisure activities (M) I02 Other invasive alien species (other than species of Union concern) (M) L02 Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No such habitat on or in close proximity to the proposed project area.
Mudflats and sandflats not covered by seawater at low tide [1140]	Inadequate	F20 Residential or recreational activities and structures generating marine pollution (excl. marine macro- and micro-particular pollution (H) A28 Agricultural activities generation marine pollution (H) G16 Marine aquaculture generating marine pollution (H)	F20 Residential or recreational activities and structures generating marine pollution (excl. marine macro- and micro-particular pollution (H) A28 Agricultural activities generation marine pollution (H) G16 Marine aquaculture generating marine pollution (H)	No such habitat on or in close proximity to the proposed project area. CG08 Reduce/eliminate marine pollution from marine aquaculture CG09 Other measures to reduce impacts from marine aquaculture infrastructures and operation CA13 Reduce/eliminate marine pollution from agricultural activities CF04 Reduce/eliminate point source pollution to surface or ground waters from industrial, commercial, residential and recreational areas and activities. The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.
Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]	Inadequate	A10 Extensive grazing or undergrazing by livestock (H) I02 Problems related to	A10 Extensive grazing or undergrazing by livestock (H) I02 Problems related to invasive alien species other	No such habitat on or in close proximity to the proposed project area. CA03 Maintain existing extensive agricultural

		invasive alien species other than those covered by EU Regulation 1143/2014 (H) A02 Conversion from one type of agricultural land use to another (excluding drainage and burning) (M) A09 Intensive grazing or overgrazing by livestock (M) F07 Sports, tourism and leisure activities (M) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defence or coast protection works and infrastructures) (M) L02 Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	than those covered by EU Regulation 1143/2014 (H) A02 Conversion from one type of agricultural land use to another (excluding drainage and burning) (M) A09 Intensive grazing or overgrazing by livestock (M) F07 Sports, tourism and leisure activities (M) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defence or coast protection works and infrastructures) (M) L02 Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	practices and agricultural landscape features The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	Bad	A06 Abandonment of grassland management (e.g. cessation of grazing or of mowing) (M) F07 Sports, tourism and leisure activities (M) I04 Problematic native species (M)	A06 Abandonment of grassland management (e.g. cessation of grazing or of mowing) (M) F07 Sports, tourism and leisure activities (M) I04 Problematic native species (M)	No such habitat on or in close proximity to the proposed project area. CA03 Maintain existing extensive agricultural practices and agricultural landscape features The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the

				2019 Article 17 Reports. No impact on conservation measures.
Estuaries [1130]	Inadequate	F20 Residential or recreational activities and structures generating marine pollution (excl. marine macro- and micro-particular pollution (H) A28 Agricultural activities generation marine pollution (H) G16 Marine aquaculture generating marine pollution (H) I02 Other invasive alien species (other than species of Union concern) (H)	F20 Residential or recreational activities and structures generating marine pollution (excl. marine macro- and micro-particular pollution (H) A28 Agricultural activities generation marine pollution (H) G16 Marine aquaculture generating marine pollution (H) I02 Other invasive alien species (other than species of Union concern) (H) XU Unknown pressure (M)	CA13 Reduce/eliminate marine pollution from agricultural activities CF04 Reduce/eliminate point source pollution to surface or ground waters from industrial, commercial, residential and recreational areas and activities. CG08 Reduce/eliminate marine pollution from marine aquaculture CG09 Other measures to reduce impacts from marine aquaculture infrastructures and operation. The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.
Annual vegetation of drift lines [1210]	Inadequate	F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures (H) C01 Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M) F01	F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures (H) C01 Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M) F01 Conversion from other land uses to housing, settlement or recreational areas (excluding drainage	The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.

		Conversion from other land uses to housing, settlement or recreational areas (excluding drainage and modification of coastline, estuary and coastal conditions) (M) F06 Development and maintenance of beach areas for tourism and recreation incl. beach nourishment and beach cleaning (M) F07 Sports, tourism and leisure activities (M)	and modification of coastline, estuary and coastal conditions) (M) F06 Development and maintenance of beach areas for tourism and recreation incl. beach nourishment and beach cleaning (M) F07 Sports, tourism and leisure activities (M)	
Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	Inadequate	C01 Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M) E01 Roads, paths railroads and related infrastructure (e.g. bridges, viaducts, tunnels) (M) F07 Sports, tourism and leisure activities (M) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures) (M) I02 Other invasive	C01 Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M) E01 Roads, paths railroads and related infrastructure (e.g. bridges, viaducts, tunnels) (M) F07 Sports, tourism and leisure activities (M) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures) (M) I02 Other invasive alien species (other than species of Union concern) (M) N03 Increases or changes in precipitation due to climate change (M) N04 Sea-level	No such habitat on or in close proximity to the proposed project area. CI03 Management, control or eradication of other alien species The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.

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		alien species (other than species of Union concern) (M) N03 Increases or changes in precipitation due to climate change (M) N04 Sea-level and wave exposure changes due to climate change (M)	and wave exposure changes due to climate change (M)	
Salicornia and other annuals colonising mud and sand [1310]	Favourable	I02 Other invasive alien species (other than species of Union concern) (M) A09 Intensive grazing or overgrazing by livestock (M)	I02 Other invasive alien species (other than species of Union concern) (M) A09 Intensive grazing or overgrazing by livestock (M)	No such habitat on or in close proximity to the proposed project area. CA15 Manage drainage and irrigation operations and infrastructures in agriculture CF02 Habitat restoration of areas impacted by residential, commercial, industrial and recreational infrastructures, operations and activities The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.
Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330]	Inadequate	A09 Intensive grazing or overgrazing by livestock (H) F07 Sports, tourism and leisure activities (H) A33 Modification of hydrological flow or physical alternation of water bodies for agriculture (excluding development and operation of dams) (M) A36 Agriculture activities not referred	A09 Intensive grazing or overgrazing by livestock (H) F07 Sports, tourism and leisure activities (H) A33 Modification of hydrological flow or physical alternation of water bodies for agriculture (excluding development and operation of dams) (M) A36 Agriculture activities not referred to above (M) F08 Modification of coastline, estuary and	No such habitat on or in close proximity to the proposed project area. CA15 Manage drainage and irrigation operations and infrastructures in agriculture CF02 Habitat restoration of areas impacted by residential, commercial, industrial and recreational infrastructures, operations and activities The proposed project does not increase, introduce or exacerbate those threats and

		to above (M) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures) (M) I02 Other invasive alien species (other than species of Union	coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures) (M) I02 Other invasive alien species (other than species of Union	pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.
Embryonic shifting dunes [2110]	Inadequate	F07 Sports, tourism and leisure activities (H) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures) (H) L01 Abiotic natural processes (e.g. erosion, silting up, drying out, submersion, salinization) (H) C01 Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M) E03 Shipping lanes, ferry lanes and	F07 Sports, tourism and leisure activities (H) F08 Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defense or coast protection works and infrastructures) (H) L01 Abiotic natural processes (e.g. erosion, silting up, drying out, submersion, salinization) (H) C01 Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M) E03 Shipping lanes, ferry lanes and anchorage infrastructure (e.g. canalisation, dredging) (M) F01 Conversion from other land uses to housing, settlement or recreational	No such habitat on or in close proximity to the proposed project area. Conservation measures that are not currently being implemented, but whose implementation would improve the condition of the 2110 habitat, include CF10 Manage changes in hydrological and coastal systems and regimes for construction and development, CC01 Adapt/manage extraction of non-energy resources, and CF03 Reduce impact of outdoor sports, leisure and recreational activities. The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.

		anchorage infrastructure (e.g. canalisation, dredging) (M) F01 Conversion from other land uses to housing, settlement or recreational areas (excluding drainage and modification of coastline, estuary and coastal conditions) (M) F06 Development and maintenance of beach areas for tourism and recreation incl. beach nourishment and beach cleaning (M) L02 Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	areas (excluding drainage and modification of coastline, estuary and coastal conditions) (M) F06 Development and maintenance of beach areas for tourism and recreation incl. beach nourishment and beach cleaning (M) L02 Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	
<i>Phoca Vitulina</i> [1365]	Favourable	C09 Geotechnical surveying (M) G01 Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and disturbance of species (M)	C09 Geotechnical surveying (M) G01 Marine fish and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and disturbance of species (M)	The proposed project does not increase, introduce or exacerbate those threats and pressures identified in the 2019 Article 17 Reports. No impact on conservation measures.

The above matrix indicates that the 2019 Article 17 reports (vol. 1 &2) threats, pressures and activities have been identified as having significant negative impacts on the Natura sites qualifying interest habitats and species will not be exacerbated or introduced as a result of the proposed project.

3.7 Potential Significant Impacts on the Natura Site (s) - Impact Prediction.

Terminology for impact significance and duration mirrors that set out by the EPA (2003). The potential impact magnitude described in the following sections, without mitigation, is neutral unless otherwise stated as being positive or negative. Where the impact is stated as being localised, it refers to the immediate area of proposed site with no impact outside of it. The activities with the potential for significant negative impacts to the Natura sites have been identified by NPWS in the Standard Natura Data Forms and Article 12 reports and have been listed and considered in the previous section.

In general, significance indicators might include but are not limited to:

- (i) impact on Annex I habitat (including loss or reduction in size - percentage relative to the overall area of the habitat in the Natura site; impairment of function);
- (ii) fragmentation of habitat or population (depending upon the duration or permanence);
- (iii) disturbance (noise, light etc. - distance, duration);
- (iv) effect on species populations (direct or indirect damage to size, breeding patterns etc);
- (v) Changes in water quality.

In the context of the Habitats Directive significant effects may be described as follows: "...within the Habitats Regulations, significance is quite different. It is used as a coarse filter and the test is a question over the possibility that there will be a significant effect on a key receptor that determines the conservation status of a European site. Thus, determining whether there will be a likely significant effect' does not imply that there will be such an effect or even that such an effect is more likely than not; it simply flags the need to test the issues and then make a judgement of the pathways and mechanisms imposed by a project on the designated wildlife interest. This test best equates to the screening and scoping opinions sought for an EIA but is confined to the Natura 2000 and Ramsar interest rather than wider environmental or nature conservation issues" (Morris (2008)).

In order to assess the likely impacts and ascertain whether a significant impact on the integrity of the Natura site(s) is likely to occur as a result of the proposed development, should the appropriate assessment process be required, it is necessary to consider what constitutes the integrity of a Site as referred to in Article 6(3). The document *Managing Natura 2000 Site, The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (2000) gives clear guidance in this regard and states: "*The integrity of the site involves its ecological functions. The decision as to whether it is adversely affected should focus on and be limited to the site's conservation objectives*".

Integrity has been debated and defined in various ways in guidance documentation and literature. For example, Treweek (1999) discusses biological integrity and ecosystem health, and refers to three generally accepted criteria: systematic indicators of ecosystem

functional and structural integrity; ecological sustainability or resilience (relating to the ability of a system to withstand "natural" or anthropogenic stresses); and absence of detectable symptoms of ecosystem disease or stress. A similar, but less academic, approach is adopted by the various guidance documents with a number of definitions proposed. The essence of the concept of ecological integrity is distilled in the following definition from *Planning Policy Statement 9* (UK Department of Environment, 1994 - now superseded by PP9, 2005): "*coherence of the site's ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified*"

The most pertinent consultation document is the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, freshwater coastal and marine version 1.1.

Ecological Impact Assessment must also consider the significance of effects that may be expected arising from a proposed

development. CIEEM guidelines (2018) define a significant effect as: “an effect that either supports or undermines biodiversity conservation objectives for ‘important ecological features’... or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from “international to local”. It further states that “an effect that is sufficiently important to require assessment and reporting so that the decision maker is adequately informed of the environmental consequences of permitting a project”. A significant effect is a positive or negative ecological effect that should be given weight in judging whether to authorise a project and can influence whether permission is granted or refused and, if given, whether the effect is such that it warrants conditions, restrictions or further actions such as monitoring.

The criteria for assessment of significance effects are given in the table below. It should be noted that significant effects may also include beneficial effects.

CIEEM Impact Significance

Impact Significance	Impact / Effect	Criteria
Significant Negative Effect	Major Adverse	(i) Loss of, permanent damage to or adverse impact on any part of a site of international or national importance (ii) Loss of a substantial part or key feature of a site of regional Importance. (iii) Loss of favourable conservation status (FCS) of a legally protected species. (iv) Loss of or moderate damage to a population of nationally rare or scarce species.
	Moderate Adverse	(i) Temporary disturbance to a site of international or national importance, but no permanent damage; (ii) Loss of or permanent damage to any part of a site of regional importance; (iii) Loss of a key feature of local importance; (iv) A substantial reduction in the numbers of legally protected species such that there is no loss of FCS but the population is significantly more vulnerable; (v) Reduction in the amount of habitat available for a nationally rare or scarce species, or species that are notable at a regional or county level.
No Significant Effect	Minor Adverse	(i) Temporary disturbance to a site of regional value, but no permanent damage. (ii) Loss of, or permanent damage to, a feature with some ecological value in a local context but that has no nature conservation designation. (iii) A minor impact on legally protected species but no significant habitat loss or reduction in FCS. (iv) A minor impact on populations of nationally rare or scarce species or species that are notable at a regional or county level.
	Negligible	(i) No impacts on sites of international, national or county Importance. (ii) Temporary disturbance or damage to a small part of a feature of local importance.

		(iii) Loss of or damage to land of negligible nature conservation Value. (iv) No reduction in the population of legally protected, nationally rare, nationally scarce or notable (regional level) species on the site or its immediate vicinity. (v) Beneficial and adverse impacts balance such that resulting impact has no overall affect upon feature.
	Minor Beneficial	(i) A small but clear and measurable gain in general wildlife interest, e.g. small-scale new habitats of wildlife value created where none existed before or where the new habitats exceeds in area that habitats lost.
Significant Positive Effect	Moderate Beneficial	(i) Larger new scale habitats (e.g. net gains over 1 ha in area) created leading to significant measurable gains in relation to the objectives of biodiversity action plans.
	Major Beneficial	(i) Major gains in new habitats (net gains of at least 10 ha) of high significance for biodiversity being those habitats, or habitats supporting viable species populations, of national or international importance cited in Annexes I and II of the habitats Directive or Annex I of the Birds Directive

Based on the above the proposed project can be classified as having a negligible impact with a very limited impact zone and precautionary mitigation measures will guarantee there will be no significant direct or indirect impact on the SPA natura sites SCI species or the SAC QIH or QIS either inside or outside of the natura site boundary or on the habitats that the SCI, QIH or QIS depend either inside or outside of the Natura sites.

3.8 Potential impacts on Qualifying Natura Habitats

The qualifying interest habitat (QIH) for the SAC and SPA are listed below

[A999] Wetlands

Estuaries [1130] – not within >2.5Km

Mudflats and sandflats not covered by seawater at low tide [1140] not within >30M of development site boundary

Annual vegetation of drift lines [1210] not within >5Km

Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] not within >1Km

Salicornia and other annuals colonising mud and sand [1310] not within >5Km

Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330] not within >1.98Km

Embryonic shifting dunes [2110] not within >5Km

Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120] not within 2.77Km

Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] not within 265M

Humid dune slacks [2190] not within >3.5Km

The proposed development will not directly or indirectly impact on the natura designated areas or the qualifying interest habitats. The development site is not located within or contiguous to a natura site with no potential land take from any Natura site. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA.

The habitats identified on the proposed street lit urban made ground development site is disused GA1. The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction.

3.9 Potential impacts on Qualifying Avian species of the Natura Site (s)

The species listed below are the SCI for the Killala Bay / Moy Estuary SPA 004036

Ringed Plover (*Charadrius hiaticula*) [A137]

Golden Plover (*Pluvialis apricaria*) [A140]

Grey Plover (*Pluvialis squatarola*) [A141]

Sanderling (*Calidris alba*) [A144]

Dunlin (*Calidris alpina*) [A149]

Bar-tailed Godwit (*Limosa lapponica*) [A157]

Curlew (*Numenius arquata*) [A160]

Redshank (*Tringa totanus*) [A162]

Wetland and Waterbirds [A999]

The Natura Data form (Oct 2020) indicates that the avian SCI species are all overwintering with no breeding or nesting. The ex situ use of the SCI of areas outside the SPA designated area was also considered. IWEBS indicate that there are no areas outside of the natura site boundary, on or contiguous to the development site, that the SCI species will use in an ex situ manner for loafing, roosting, resting or foraging which would be anticipated due to the urban street lit setting which is subject to continual anthropogenic activity associated with Enniscrone town and the lack of suitable habitats for the species and potential predation from felines and disturbance from canines. There will be no impact on surface water quality or any potential prey species.

The proposed project lacks the scale, duration and magnitude to result in a significant impact on the qualifying avian species of the SPA. The CF03 conservation measure will not be impacted as there are no impacts from outdoor sports, leisure and recreational activities associated with the project. Post construction the proposed project will be completely absorbed and assimilated into the Enniscrone urban area background and there will be no increase in lux levels or noise within the SPA.

The Article 12 report and the October 2020 Natura Form lists the threats and pressures on the SPA and the SCI and the proposed project will not increase or exacerbate any of the identified threats and pressures nor will it introduce any of those threats and pressures. The proposed project will not impact on the Article 12 conservation measures, proposed or otherwise, for any of the avian species. The heavier elements of such projects (foundations, block work, roofing) normally occurs during late spring, summer and early autumn due to meteorological and ground conditions. However this will be reinforced through precautionary mitigation measures to guarantee that there will be no impacts on any of the special conservation interest SPA avian species during construction from potential impact noise as they will not be present due to the fact that they are overwintering species. The SPA is 7.4M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA.

In terms of significance the proposed project impact both during construction (with precautionary mitigation) and subsequent habitation is negligible and extremely localised.

3.1.0 Potential impacts on Qualifying Mammalian species of the Natura Site (s)

Phoca vitulina (Harbour Seal) [1365] is the only mammalian species listed in the Qualifying interests for the SAC. The proposed development will not impact directly or indirectly on it. There will be no deterioration in water quality either during construction or with subsequent use therefore there will be no impact on the species or its prey species. No in stream or along stream works are required or proposed. No entry to the SAC area and no land take from the SAC. The species is recorded >3Km to the West and will not use the proposed development site or intervening lands in any fashion due to the continual anthropogenic and therefore will not be impacted by the proposed project either during construction or with subsequent habitation. The proposed project will not require any activity to traverse or enter the SAC area. No material will be deposited in or removed from the marine section of the SAC. No in stream or along stream works are proposed or required.

3.1.1 Potential impacts on Qualifying aquatic species of the Natura Site (s)

The SAC is designated for the following qualifying interest aquatic species

Petromyzon marinus (Sea Lamprey) [1095]

The species will be impacted by the proposed development. There will be no deterioration in surface water quality, transitional, Marine or freshwater, either during construction or with subsequent habitation. The proposed development will not impact directly or indirectly on the species as there is no potential deterioration in surface water quality. There will be no impact on the species habitat requirements or its prey species. No in stream or along stream works are required or proposed. The proposed project does not require any activity to traverse or enter the SAC area or any surface water feature. No material will be deposited in or removed from the aquatic section of the SAC. No in stream or along stream works are proposed or required. Noise, light, dust and vibration from the construction works or subsequent habitation and will be undetectable within the aquatic section of the SAC. There is no ex situ use of the development site by those species due to the lack of suitable habitat. The species is not dependant on the habitat on the development site. No barriers to migration associated with the proposed project as it does not involve any works inside the boundary of the SAC or in an surface water feature.

3.1.2 Potential impacts on qualifying Botanical species of the Natura Site (s)

The SAC is not designated for the presence of specific botanical species but is designated for habitat type see section 3.8

3.1.3 Potential impacts on qualifying Invertebrate species of the Natura Site (s)

[1014] Narrow-mouthed Whorl Snail (*Vertigo angustior*) is not recorded on the conservation objectives within >5Km of the development site boundary. The species will not be impacted as there is no suitable habitat on the proposed site for the species as there will be no entry into the SAC area with no requirements to enter or traverse the SAC, no material deposited in or removed from the SAC and no land take.

3.1.4 Other factors that may impact on the Natura Site (s)

The footprint of the proposed development combined with the proposed simple precautionary mitigation measures (which includes timing of construction), small scale, separation distance and short duration of the project, urban street lit setting will ensure that noise, vibration, air quality and light from construction and subsequent habitation will not impact on the SPA SCI , SAC QIS or QIH either directly or indirectly, inside or outside of the SAC and SPA boundaries or the habitats or

species on which they depend either inside or outside of the SAC or SPA designated area. There are no external light requirements associated with the construction phase of the development with no significant light sources associated with habitation and the proposed project is not a noted source of light leakage and will be absorbed into the back ground. There are no activities associated with the project that could give rise to significant ppv which would be extremely localised of short duration and undetectable at a radius of 10M from the development during construction and will be completely undetectable outside of the development site boundary. Impacts with any area outside of the proposed development foot print due to vibration will not occur given its location, nature and scale for example ppv of a hydraulic roller at 25M is only 1.5mms with a truck on rough surfaces only produce a ppv of <2mm/s at 20M with potential vibration undetectable in the SAC aquatic section. The activities which generate significant vibration are rock breaking, blasting and pile driving, none of which are associated with the proposed project. Air over pressure is not a consideration given the nature of the proposed project. There is no post construction vibration to consider. The construction or use of the development is not a noted source of fugitive dust with no climatic considerations associated with the proposed development.

Fugitive dust generated predominantly during the construction of the proposed development could be described as inert and harmless in the chemical context and would not contain any of the harmful compounds as described and listed in Atmospheric Emissions by T.A. Luft, (1986), section 2.3. The main concerns with respect to dust are generally experienced within 100m of a significant dust source and it can be inferred that there will be no negative impact on the Natura site as the proposed project is not considered a significant fugitive dust source (during construction or subsequent habitation) and the 350mg/M²/Day (Bergerhoff) limit will not be approached outside of the development site boundary. The proposed project is not a noted source of fugitive dust which tends to be the reserve of certain industries and in particular crushing in the extractive industry.

The noise source is external in nature and its dimensions are small compared to the location, in respect to the designated natura sites, then as the sound energy is radiating it will spread over an area that is proportional to the square of the distance. As this is an inverse square law then the sound level will decline by 6dB for each doubling of distance and will not have a deleterious effect on the Natura site either during construction or with subsequent habitation. With respect to noise typical values in the vicinity of the development post construction would be in the order of 55- 65 dB_{L_{aeq}} and dominated by the RTN from the existing Enniscrone urban area. Post construction the proposed development will be completely absorbed into the back ground with no detectable increase in noise levels within the Natura sites or at any location outside of the Natura sites that the QIS or SCI utilise. Precautionary mitigation measures, such as timing of construction, will ensure none of the SPA SCI species will be present or impacted by the construction phase.

Compaction is limited to within the development site boundary which is undesignated GA1 habitat and is not a QI habitat for the SPA SCI or SAC QIH or QIS.

Traffic, air quality or climatic factors associated with construction or use will not significantly impact on the Natura site given its lack of scale, separation distance and short duration. The limit values for SO₂ (20µg/M³ protection of vegetation) and NO + NO₂ (30 µg/M³ protection of ecosystems) will not be approached either during construction or with subsequent habitation.

The development will not have a negative impact on water resources either qualitatively or quantitatively as there are no direct discharge to ground water, surface water or abstraction from either. No changes to surface water quality (microbiologically, chemically, physically or quantitatively) are anticipated in surface water given that there are no direct discharges to or abstraction from surface water. The Enniscrone WWTP has excess capacity to cater for the proposed development.

Post construction no changes to surface water quality (microbiologically, chemically, physically or quantitatively) are anticipated. Batch concrete trucks are prohibited from the washing out of the drum on site which is now industry standard due to potential liability. The volume of concrete and aggregate that are to be used are relatively small in terms of construction sites and for practical reasons the mixing pad will be located as close to the area of construction as possible. Any activity involving the mixing of render or concrete is only carried out during relatively dry weather and never during periods of frost or heavy rain for structural reasons. Once cured concrete is inert and immobile and in normal circumstances goes off in less than 24Hrs (water proof skin <3hrs) consequently there is no potential for material from the mixing pad, with mitigation, to enter any surface water feature as it

becomes immobile in soils. Pouring of the raft foundations will be into shuttered form which prevents egress of concrete from the area of construction which is essential for structural reasons.

The restricted species as listed in appendix of this report will not be utilised or introduced for the purposes of landscaping or any other purposes which is covered by the European Communities (Birds and Natural Habitats) Regulations 2011 and address / controls the problem of invasive species. A black list of unwanted species is set out in the Regulations. It will be an offence without a license, to release or allow to disperse or escape, to breed, propagate, import, transport, sell or advertise such species. The two regulations that deal specifically with these scheduled lists of species are Article 49 which prohibits the introduction, breeding, release or dispersal of certain species and Article 50 which prohibits dealing in and keeping certain species.

A watertight container will be provided for the storage of empty chemical containers which shall be removed off site and disposed of appropriately as required which is now industry standard.

No material will be removed from the Natura Sites as a result of a grant of planning permission. All construction related materials would only be stored adjacent to the construction area and >30M from any surface water feature with mitigation and the project will have to comply with the Inland Fisheries `` Guidelines on protection of fisheries during Construction works in and adjacent to waters" and the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites".

No tree / felling/ trimming are proposed or required. Any tree or hedgerow removal, felling, trimming, coppicing required will be governed by the Restrictions on cutting hedgerows which are set out in Section 40 of the Wildlife Act 1976 as amended by the Wildlife (Amendment) Act 2000 and the Heritage Act 2018. These Acts stipulate that it is an offence to destroy vegetation on uncultivated land between the 1st of March and the 31st of August each year and will have to be complied with irrespective of the type of project proposed

No land drainage works are proposed or required. A grant of planning would not require any construction related activities to enter or traverse the aquatic section of the Natura site or any tributary of the natura site. The construction of the main elements of the proposed development is project to take < 12 months from start to finish.

Simple precautionary mitigation measures to address any potential disturbance of the SPA SCI which may utilise the IWEBS sub site OC455 during construction that the SCI may utilise combined with simple standard precautionary mitigation measures to ensure that surface water quality not be impacted will mitigate any and all potential direct and indirect impacts.

3.1.5 Describe any likely changes to the Natura Sites for further consideration arising as a result of:

- (vi) Reduction in habitat area:**
- (vii) Disturbance to Key species:**
- (viii) Habitat or species density:**
- (ix) Changes in key indicators of conservation value (water quality etc);**
- (x) Climate change**

Potential Impact	Direct Impact	Indirect / Secondary Impact
Loss of Habitat / Land Take	No land take from the SAC or SPA	There will be no secondary loss or land take from a natura site.

Habitat Fragmentation	No fragmentation of the SPA or SAC habitat,	No indirect impact
Disturbance	The scale, duration and nature of the proposed activity will not give rise to significant disturbance of the SPA SCI habitats or species. The timing of the proposed project dictates that SAP SCI species will not be present during construction. No potential disturbance of SAC QIS	No areas outside of the SPA boundary in close proximity to the urban site that the SCI utilise. The timing of the proposed project dictates that SAP QI species will not be present during construction.
Impacts on migration	No impact on the migration of the SPA SCI avian species will occur as they will not be present during construction with no post construction impacts to consider. No impact on the SAC QIS.	No secondary impacts on migration are anticipated.
Impact on Qualifying Interest Species or SCI	No impact on the qualifying interest species and no loss of habitat for those species with no ex situ use of the terrestrial development area by the SCI or QIS. Water quality will not be impacted by the proposed development either during construction or with subsequent use.	No indirect impacts anticipated as water quality and habitat requirements will not be impacted. No suitable habitat for the SCI outside of the SPA boundary on or contiguous to the development site boundary. No impact on the QIS.
Reduction in SCI or QIS species density	No reduction in SCI or QIS habitat requirements with respect to water quality or prey species. No impact on the SCI species which utilise the SPA due to the small scale and nature of the proposed project.	No secondary impacts are anticipated. Subsequent habitation is a low level activity with no potential for a reduction in SCI species, QIS or the habitats on which the SCI or QIS depend either inside or outside the SPA boundary.
Water quality (surface or ground water)	No impacts on the surface water or ground water quality.	None – Enniscrone UWWTP has excess capacity to cater for the development.
Water resource	None – no abstraction or discharges from or to surface water associated with the project	None
Light	None – no lighting requirements during construction. The development site is already street lit due to its location in the Enniscrone urban area.	None – dwellings not a noted source of light leakage.
Noise	The project will be absorbed into the back ground during construction due to the small scale and nature of the	None –SPA QI overwinter species will not be present during construction.

	project. Post construction no noise sources are anticipated. Timing of the project dictates that the SCI species will not be present for that phase	Completed project completely absorbed and assimilated into the Enniscrone Urban area background.
Vibration	Vibration during construction would be undetectable outside of the development site boundary for example the ppv of a hydraulic roller at 25M is only 1.5mms which truck on rough surfaces only produce a ppv of <2mm/s at 20M and consequently would be undetectable at a distance of 10M. The project does not require the use of vibration generating equipment such as a rock breaker. Air over pressure is not a consideration.	No post construction vibration to consider.
Compaction	No activity outside of the development site boundary or within the boundary of the SAC / SPA	None
Traffic	No significant impacts as no increase in traffic movements post construction which could impact on the SPA's SCI. The traffic movements will be absorbed into the back ground due to the urban location. The SPA avian species will not be present during construction should a mitigation measure be that it occurs during the summer months.	None predicted – post construction project will be completely absorbed into the back ground
Synergistic effects	The relatively inert nature of the completed project dictates that post construction there is no potential for synergistic effects. The SPA avian species will not be present during construction and will not be impacted with habitation.	No potential overlap or commonality of impacts with any other plan or project no plans or projects with 250M of the development site boundary and no impact on wetlands or habitats on which the SCI depend either inside or outside of the SPA boundary. No impact on QIH, or QIS or on the habitats on which the QIS or QIH depend either inside or outside of the SAC boundary.
Introduction of extraneous material to the aquatic environment	None – Mitigation measure will ensure that no extraneous material will not egress the development area and enter the aquatic section of the SPA or any tributary of the SPA.	None – Mitigation measure will ensure that no extraneous material will egress the development area and enter the aquatic section of the SPA or any tributary of the SPA
Construction	No significant impacts on the SPA with mitigation	None

	measures to ensure no impact on the aquatic section of the SPA or any tributary of the SPA with timing ensuring that there is no impact on the SPA overwintering species. The project is vey small in both scale and duration.	
Subsequent Use	No impacts on the SPA – project completely assimilated and absorbed into back ground	No secondary impacts are anticipated.
Air quality	None – no discharges to air associated with the project either during construction or with subsequent use –	None
Climatic	None	None

3.1.6 Describe any likely impacts on the Natura 2000 sites as a whole in terms of:

(i) Interference with the Key relationships that define the structure of the site.

(ii) Interference with key relationships that define the function of the site.

It is established that no section of the proposed development site is within or contiguous to the Killala Bay Moy Estuary SAC and SPA. The development site is not located within or contiguous to a natura site with no potential land take from any Natura site. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA.

The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road. Such conditions are designed to protect the urban environment and will have the indirect and unintended consequence of also adding a layer of protection to the Natura Sites during construction.

The SAC qualifying interest species are either aquatic or have specific habitat requirements and are not dependant on the habitat included within the development site boundary, or the habitats contiguous to the development site, with no projected impact on surface water quality. Noise, vibration, light and dust during conservation works will not be detectable within the SPA / SAC aquatic section or qualifying habitats. There is no water abstraction or direct discharges to ground water or surface water associated with the project. One of the key relationships that define the structure and function of the SAC for the QI species is water quality which will not be impacted either during construction works (with mitigation) or with subsequent habitation. The proposed project does not involve in stream or along stream works and no material will be deposited in or removed from the SAC. Prey species for the QIS and SCI species will not be impacted as there will be no impact on surface water quality. No land drainage works are proposed or required. There are no qualifying interest habitats on or contiguous to the development site. The proposed project will not alter interfere or impact on the key relationships that define the structure of the SAC or SPA Natura sites.

None of the NPWS or Article 17 identified threats or pressures are associated with the proposed project and those threats and pressures will not be exacerbated or increased as a result of the proposed project with no impact on the conservation measures.

None of the NPWS or Article 12 identified threats or pressures are associated with the proposed project and those threats and pressures will not be exacerbated or increased as a result of the proposed project with no impact on the conservation measures

There is no interdependence between the proposed development site and the SAC or SPA QIS, QIH or SCI species which will not utilise the site in an ex situ manner due to their habitat requirements and the urban street lit setting of the proposed development site.

The proposed project will not negatively impact on the conservation objectives for the Natura sites.

There will be no Interference with the Key relationships that define the structure of the natura sites or interference with key relationships that define the function of the sites.

3.1.7 CONSIDERATION OF SIGNIFICANCE

In terms of significance, the NPWS Guidance (2010 Rev) uses an EC definition as follows:..." *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)*". Other guidance documents also discuss significance criteria, some in more detail than others.

In general, significance indicators might include but are not limited too:

- (1) impact on Annex I habitat (including loss or reduction in size - percentage relative to the overall area of the habitat in the Natura site; impairment of function);
- (2) fragmentation of habitat or population (depending upon the duration or permanence);
- (3) disturbance (noise, light etc. - distance, duration);
- (4) effect on species populations (direct or indirect damage to size, breeding patterns etc);
- (5) Changes in water quality.

In the context of the Habitats Directive significant effects may be described as follows: "...Within the Habitats Regulations, significance is quite different It is used as a coarse filter and the test is a question over the possibility that there will be a significant effect on a key receptor that determines the conservation status of a European site. Thus, determining whether there will be a likely significant effect' does not imply that there will be such an effect or even that such an effect is more likely than not; it simply flags the need to test the issues and then make a judgement of the pathways and mechanisms imposed by a project on the designated wildlife interest. This test best equates to the screening and scoping opinions sought for an EIA but is confined to the Natura 2000 and Ramsar interest rather than wider environmental or nature conservation issues"(Morris (2008)).

In order to assess the likely impacts and ascertain whether a significant impact on the integrity of the Natura site(s) is likely to occur as a result of the proposed development, should the appropriate assessment process deemed to be required, it is necessary to consider what constitutes the integrity of a Site as referred to in Article 6(3). The document *Managing Natura 2000 Site, The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (2000) gives clear guidance in this regard and states: "The integrity of the site involves its ecological functions. The decision as to whether it is adversely affected should focus on and be limited to the site's conservation objectives". Integrity has been debated and defined in various ways in guidance documentation and literature. For example, Treweek (1999) discusses biological integrity and ecosystem health, and refers to three generally accepted criteria: systematic indicators of ecosystem functional and structural integrity; ecological sustainability or resilience (relating to the ability of a system to withstand "natural" or anthropogenic stresses); and absence of detectable symptoms of ecosystem disease or stress. A similar, but less academic, approach is adopted by the various guidance documents with a number of definitions proposed. The essence of the concept of ecological integrity is distilled in the following definition from *Planning Policy Statement 9* (UK Department of Environment, 1994 - now superseded by PP9, 2005): "*coherence of the site's ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified*".

European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála_- all the habitats and species for which the Natura 2000 site is protected must be catalogued; an Appropriate Assessment must identify and examine the implications of the proposed project for species present in the Natura 2000 site, including species for which the site has been listed and those for which it has not, provided those implications are liable to affect the conservation objectives of the site; an

Appropriate Assessment must identify and examine the implications of the proposed project for species and habitats outside the boundaries of the Natura 2000 site, provided those implications are liable to affect the conservation objectives of the site. Consequently all proposed projects must be assessed in terms the potential impacts on the conservation objectives both within the boundary of the natura site and outside the boundary of the Natura site if there is a potential that any of the QIS, QIH or SCI species are dependant on those habitats and species outside the boundary of the Natura site. Provided the proposed project and all associated ancillary activities both during construction and with subsequent habitation are excluded from the SPA and SAC area and there are no impacts on surface water quality either inside or outside the SPA or SAC then there will be no significant impacts on the SAC QIS, QIH or the SPA SCI or their conservation objectives. There are no areas outside of the SPA and SAC designated areas, on or contiguous to the development site, that the QIS, QIH or SCI utilise due to the urban street lit location which is subject to continual anthropogenic activity. The proposed project will be completely absorbed and assimilated into the background and undetectable inside the Natura sites boundaries.

3.1.8 Other Plans or Projects on which the proposed Development may Impact.

The following section examines a number of plans, targets, objectives, directives and international agreements considered.

The National River Basins Management plans were created in response to the water frame work directive must also be considered. Under the management plan it is proposed to increase (or maintain) surface water and ground water quality to 'Good Status'. To ensure this objective is achieved then no plan or project is permitted that would contravene this. The 2018 – 2021 River Basin Management plans Catchment assessment are not yet available and are currently being completed by the Environmental Protection Agency's Catchment Science and Management Unit. On April 17th 2018 the Government published the River Basin Management Plan for Ireland 2018-2021. The Plan sets out the actions that Ireland will undertake to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries and coastal waters) by 2027, which is an extension to the original time frames which were prescribed under the 1st cycle WFD targets and objectives

EU Biodiversity Strategy for 2030

The European Commission has adopted the new EU Biodiversity Strategy for 2030 and an associated Action Plan (annex) - a comprehensive, ambitious, long-term plan for protecting nature and reversing the degradation of ecosystems. It aims to put Europe's biodiversity on a path to recovery by 2030 with benefits for people, the climate and the planet. It aims to build our societies' resilience to future threats such as climate change impacts, forest fires, food insecurity or disease outbreaks, including by protecting wildlife and fighting illegal wildlife trade. A core part of the European Green Deal, the Biodiversity Strategy will also support a green recovery following the COVID-19 pandemic

Objectives

The biodiversity strategy aims to put Europe's biodiversity on the path to recovery by 2030

Actions

The strategy contains specific commitments and actions to be delivered by 2030.

Establishing a larger EU-wide network of protected areas on land and at sea

The EU will enlarge existing Natura 2000 areas, with strict protection for areas of very high biodiversity and climate value.

Launching an EU nature restoration plan

Through concrete commitments and actions, the EU aims to restore degraded ecosystems by 2030 and manage them sustainably, addressing the key drivers of biodiversity loss.

As part of this plan, the Commission will propose binding nature restoration targets by the end of 2021 however this is now extended to 2022.

Introducing measures to enable the necessary transformative change

The strategy highlights unlocking funding for biodiversity, and setting in motion a new, strengthened governance framework to

Introducing measures to tackle the global biodiversity challenge

These measures will demonstrate that the EU is ready to lead by example to address the global biodiversity crisis. In particular, working towards the successful adoption of an ambitious global biodiversity framework under the Convention on Biological Diversity.

The EU Biodiversity Strategy for 2030 sets out a truly ambitious and far-reaching program of measures to halt and reverse biodiversity loss in the EU and across the globe. The challenge ahead is daunting and our ambition high, but it is actually not a matter of choice: halting biodiversity loss is a necessity for a stable future on this planet, and a socioeconomic imperative to deliver the European Green Deal.

Convention on Biological Diversity, key international instrument for sustainable development

The Convention on Biological Diversity (CBD) is the international legal instrument for "the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilisation of genetic resources" that has been ratified by 196 nations.

Its overall objective is to encourage actions, which will lead to a sustainable future.

The conservation of biodiversity is a common concern of humankind. The Convention on Biological Diversity covers biodiversity at all levels: ecosystems, species and genetic resources. It also covers biotechnology, including through the Cartagena Protocol on Biosafety. In fact, it covers all possible domains that are directly or indirectly related to biodiversity and its role in development, ranging from science, politics and education to agriculture, business, culture and much more.

The CBD's governing body is the Conference of the Parties (COP). This ultimate authority of all governments (or Parties) that have ratified the treaty meets every two years to review progress, set priorities and commit to work plans.

The Secretariat of the Convention on Biological Diversity (SCBD) is based in Montreal, Canada. Its main function is to assist governments in the implementation of the CBD and its programs of work, to organize meetings, draft documents, and coordinate with other international organizations and collect and spread information.

Sligo County Council County Development Plan

EU Multi Species Action Plan 2018 – 2024

The NIS also complies with the followings court rulings.

European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála - the competent authority

may grant consent for a plan or project that leaves for later decision the determination of certain parameters relating to the construction phase if the competent authority is certain (i.e. 'no reasonable scientific doubt') that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

High Court Ruling 2nd February 2019 by Mr. Justice Barniville; Neutral Citation [2019] IEHC 84; High Court Record No. 2017 883 JR; Kelly -v- An Bord Pleanála & Anor- SUDS are not mitigation measures which a competent authority is precluded from considering at the stage 1 screening stage.

European Court of Justice 19th April 2018; Case C 164/17; Grace & Sweetman -v- An Bord Pleanála – a measure compensating for the negative effects of a project cannot be taken into account in an Appropriate Assessment Natura Impact Statement (Stage 2).

European Court of Justice Judgement 12th April 2018 by the Seventh Chamber; Case C 323/17;

People Over Wind & Sweetman -v- Coillte Teoranta - it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on a Natura 2000 site.

High Court Ruling 25th February 2016 by Mr. Justice Barton; Neutral Citation [2016] IEHC 134; High Court Record No. 2013 450 JR; Balz & Heubach -v- An Bord Pleanála - recording complete definitive and precise findings, and conclusions re Appropriate Assessment.

High Court Ruling 24th November 2014 by Mr. Justice Hedigan; Neutral Citation [2014] IEHC 557; High Court Record No. 2014 320 JR; Rossmore Properties Limited & Anor -v- An Bord Pleanála – where mitigation measures are an intrinsic part of a project, they may be taken into account in the stage 1 screening process.

High Court Ruling 25th July 2014 by Ms. Justice Finlay Geoghegan; Neutral Citation [2014] IEHC 400;

High Court Record No. 2013 802 JR; Kelly -v- An Bord Pleanála – judicial review of grant of planning by An Bord Pleanála for two wind farm phases in County Roscommon, including failure of ABP to carry out lawful appropriate assessment and giving reasons for its determination.

European Court of Justice Judgement 11th April 2013 by the Third Chamber; Case C258/11 Peter Sweetman and Others v An Bord Pleanála - criteria to be applied when assessing the likelihood that a project or plan (N6 Galway City Outer Bypass road scheme in this case) will adversely affect the integrity of a Natura 2000 site (Lough Corrib SAC in this case), where the integrity of a Natura 2000 site is considered to be adversely affected if a plan or project is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site.

European Court of Justice Opinion 22nd November 2012 by Advocate General Sharpston; Case

C258/11 Peter Sweetman and Others v An Bord Pleanála – in determining whether a project or plan has an adverse effect on the integrity of a site (to which Article 6(3) of Council Directive 92/43/EEC applies), an effect which is permanent or long lasting must be regarded as an adverse effect.

Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes: Practitioner's Manual (EPA 2013).

Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Commission Notice (European Commission 2018).

1A European Court of Justice ruling in 2013 (Case C258/11) has stated the following regarding significant effect: “Where a plan or project not directly connected with or necessary to the management of a site is likely to undermine the site’s conservation objectives, it must be considered likely to have a significant effect on that site. The assessment of that risk must be made in the light of, in particular, the characteristics and specific environmental conditions of the site concerned by such a plan or project (see, to this effect, Waddenvereniging and Vogelbeschermingsvereniging, paragraph 49)”

Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – European Commission Methodical Guidance on the provisions of Article 6(3) and 6(4) of the ‘Habitats’ Directive 92/43/EEC (European Commission 2001).

High Court Ruling 2nd February 2019 by Mr. Justice Barniville; Neutral Citation [2019] IEHC 84; High Court Record No. 2017 883 JR; Kelly -v- An Bord Pleanála & Anor- SUDS are not mitigation measures which a competent authority is precluded from considering at the stage 1 screening stage.

Directive - Birds Directive

Directive - Habitats Directive

Directive - Drinking Waters Directive

Directive - Major Accidents and Emergencies Directive

Directive - Environmental Impact Assessment Directive

Directive - Sewage Sludge Directive

Directive - Urban Waste Water Treatment Directive

Directive - Plant Protection Products Directive

Directive - Nitrates Directive

Directive - Integrated Pollution Prevention Control Directive

Other Stipulated Measure - Cost recovery for water use

Other Stipulated Measure - Promotion of efficient and sustainable water use

Other Stipulated Measure - Protection of drinking water sources

Other Stipulated Measure - Control of abstraction and impoundment

Other Stipulated Measure - Control of point source discharges

Other Stipulated Measure - Control of diffuse source discharges

Other Stipulated Measure - Authorisation of discharges to groundwaters

Other Stipulated Measure - Control of priority substances

Other Stipulated Measure - Controls on physical modifications to surface waters

Other Stipulated Measure - Controls on other activities impacting on water status

Other Stipulated Measure - Prevention or reduction of the impact of accidental pollution incidents

On-site waste water treatment systems

Freshwater Pearl Mussel sub-basin plan

Shellfish Pollution Reduction Plan

NRBMP / WFD

The following reference documents were also consulted to ensure that the data and findings contained in the NIS ensures that the integrity of the SAC is preserved.

Status of Protected Habitats and Species in Ireland (NPWS 2019)

The proposed project will not impact on any of the above. Any expansion of the natura sites would not result in the development

site being designated as there are is no undesignated qualifying interest habitats present with on which the SCI are dependant due to the current agricultural activity. There will be no impact on the SCI species either inside or out side of the SPA boundary with mitigation measures to ensure no impact on surface water quality. The proposed project can be attributed a neutral impact and is deemed negligible under CIEEM 2019. The projected impact of the project is extremely localised and confined to within the development site boundary.

3.1.9 Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 Site.

The potential cumulative impacts on the SAC and SPA from the proposed development in combination with the impacts from other significant projects are assessed in this section. As indicated in the previous sections there are no potential impacts on the SPA SCI or conservation objectives from the proposed development provided the heavier elements of construction occur during a period when the wintering only SCI are not present in the SPA. There will be no increase in lux levels, anthropogenic activity, vibration or noise within the SPA with no land take and no impact on the designated area (no entry into, traversing, material deposited in or removed from).

The proposed development will connect to the Enniscrone UWWTP and storm water sewer and during construction or with subsequent habitation there will be no impact on surface water quality, freshwater or marine, therefore no in combination impacts are anticipated with respect to surface water quality in the SPA or SAC.

The proposed project will not increase or exacerbate the NPWS or Article 12 identified pressures or threats to the Natura site therefore no cumulative impacts are possible.

The proposed project will not increase or exacerbate the NPWS or Article 19 identified pressures or threats to the Natura site therefore no cumulative impacts are possible.

The proposed impact of the project is extremely localised, of small scale and short duration and will be completely absorbed and assimilated into the Enniscrone Urban area background.

A desk top study in conjunction with on site survey (ecological, hydrological) was carried out on site. From this it was determined that the proposed project will not have a significant effect on the Natura sites either directly or indirectly, alone or in combination with other projects. The projected impact of the development is considered neutral with no in combination impacts possible due to the low levels of activity proposed in an existing urban street lit environment. The proposed project lacks the scale, duration and magnitude to impact on surface water quality and ground water quality both during construction and with subsequent habitation and will be connected to the existing public UWWTS which has excess capacity to cater for the development. There are no direct discharges to surface water with no impact on ground water quality. None of SAC QIS species are present on the development section of the site with no ex situ use of the site by those species and no interdependence. The SAC qualifying interest species are aquatic or confined to the estuary / sea shore areas and consequently it is not possible for the SAC qualifying interest species to be present on the urban development site. No SAC qualifying interest habitats are located on the development area of the site.

The proposed project naturally exceeds the requirements of the Inland Fisheries Board document “*Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites*” by multiple factors.

The proposed project will not require a surface water feature or natura site to be entered or traversed.

The development site is not located within or contiguous to a natura site with no potential land take from any Natura site. The terrestrial section of the SPA is located at closest 7.4M West of the development site boundary on the opposite side of the Cliff

Road and 1.5M high concrete wall. The SAC is 29.6M West of the development site boundary on the opposite side of the Cliff Road, 1.5M high concrete wall and the concrete promenade. This dictates that there is no land take from a natura site and there is no possibility of entry into or the traversing of the SAC or SPA and no material will be deposited in or removed from the SAC or SPA.

There are no similar, or otherwise, projects in close proximity to the proposed to be considered with no potential overlap or commonality of impact zones with any other plan or project.

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3.1.9 Mitigation Measures

The following are the proposed precautionary mitigation measures.

- (1) Refuelling hydrocarbons for heavy plant shall not be stored on the development site.
- (2) The heavier elements of construction (site clearing, Excavation, foundations, block work and roofing (including felting, battens and tiling / slating) shall only occur between the 1st of April and the 31st of August in any year

3.1.10 Efficacy of Proposed Mitigation Measures

The timing of the proposed project will ensure there will be no impact on the SPA SCI avian species as they will not be present during construction. Post construction the proposed project will be completely absorbed and assimilated into the Enniscrone street lit urban area.

4.0 List of agencies consulted

As part of the Planning Process Sligo County Council will request input from the NPWS DAU therefore to avoid duplication consultation with NPWS will be through the planning process.

4.1 Response to consultation.

N/A

4.2 Overall Conclusions:

The implementation of the simple precautionary mitigation measures dictate that there is no realistic or reasonable scientific evidence indicating that the proposed project will have a significant or insignificant negative impact directly or indirectly on the Killala Bay / Moy Estuary SAC and SPA conservation objectives, QIH, QIS, SCI, Article 19 conservation measures, Article 12 conservation measures, nor will it increase or exacerbated the NPWS identified threats or pressures or the threats and pressures on the qualifying interests identified in the Natura Data Form.

Not with standing the European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála
“the competent authority may grant consent for a plan or project that leaves for later decision the determination of certain parameters relating to the construction phase if the competent authority is certain (i.e. ‘no reasonable scientific doubt’) that the development consent granted establishes conditions that are strict enough guarantee that those parameters will not adversely affect the integrity of the site.

It can be determined that the proposed project will not significantly impact on the conservation objectives or SCI of the SPA, nor will it impact on the habitats or species on which the SCI are dependant either inside or outside of the Natura site boundary provided the mitigation measures are complied with.

CIEEM It can be determined that the proposed project will not significantly impact on the conservation objectives, QIH or QIS of the SAC, nor will it impact on the habitats or species on which the QIH or QIS are dependant either inside or outside of the Natura site boundary.

The CIEEM 2019 assessment matrix indicates that the impacts of the proposed project are negligible and therefore there will be no significant impacts on the Natura sites with respect to the conservation objectives, QIH, QIS or SCI species.

The proposed project will not alter, interfere or impact on any of the key relationships that define either the function of or the structure of the Natura sites. The proposed project will not contravene the conservation objectives or impact on the features of interest for which the SPA or SAC were designated.

It is determined that the proposed project would not contravene or conflict with the policies or objectives for the SAC or SPA.

The conclusion satisfies the judgment of the European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála“all the habitats and species for which the Natura 2000 site is protected must be catalogued; an Appropriate Assessment must identify and examine the implications of the proposed project for species present on the Natura 2000 site, including species for which the site has been listed and those for which it has not, provided those implications are liable to affect the conservation objectives of the site; an Appropriate Assessment must identify and examine the implications of the proposed project for species and habitats outside the boundaries of the Natura 2000 site, provided those implications are liable to affect the conservation objectives of the site” which dictates that provided the conservation objectives are not contravened and there is no impact on the SCI or the habitats on which they depend either inside or outside the SPA boundary then there is no realistic or reasonable scientific evidence that there will be any significant impacts on the Natura sites SCI or QIH.

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APPENDIX A

N/A

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APPENDIX B

MAP: 1 Development Location

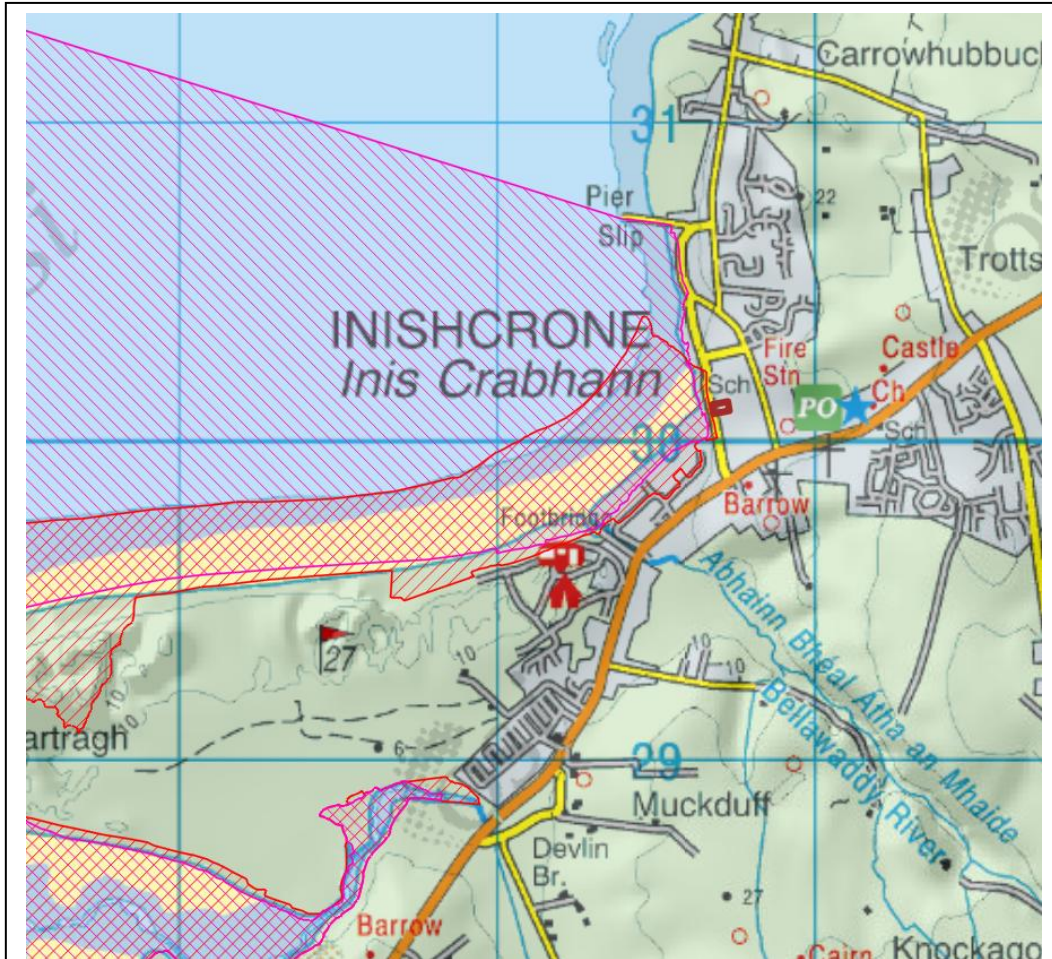


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APPENDIX C

AA SPECIFIC ECOLOGICAL SURVEY (QIS, QIH and SCI only)
REGARDING A PLANNING APPLICATION FOR THE
CONSTRUCTION OF 3 X DETACHED ONCE OFF DWELLING
AT
CLIFF ROAD, ENNISCURONE, CO. SLIGO

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Client: Frank Mulrennan
Cliff Road
Enniscrone
Co. Sligo

Paul Neary B.Sc. (Hns. Env. Sc.) M.Sc. (Eco. Tox)
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Flood Plain Assessment (coastal, fluvial, pluvial), Appropriate Assessment Screening Reports, Natura Impact Assessments, Environmental Impact Assessment, Environmental Management Systems, Noise Monitoring, Isophonic Mapping, Treatment Plant Design and Review, Water & Waste Water Monitoring, Ecological Surveys,

(1) SITE DESCRIPTION AND DESK TOP STUDY

(2) PLOT HISTORY AND CURRENT LAND USE

(3) ECOLOGICAL SURVEY

(a) Ecological survey

(b) Habitats

(c) Fauna

(d) Avian Species

(e) Invertebrates

(f) Aquatic Species

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Appendix 1: Habitat Map

(1) Site Description and desk top study

The West facing 0.239Ha urban street lit green field infill site is located in the Enniscrone urban area with an address at Cliff Road, Enniscrone, Co. Sligo. The site is located East of the Cliff Road, 216M North of Main street (R297) at grid reference 528667, 830114.

The development the construction of 3 X 4 bed storey and a half detached dwelling houses (1 X 190M², 1 X 177M² and 1 X 177M²), car park spaces, connection to all existing public services (Enniscrone town foul sewer D0102 (design p.e. 5,000, current loading 3,497p.e.), Enniscrone storm water sewer, electricity, telecoms, water) and all other ancillary site work and services on a brown field street lit urban infill site.

The urban setting in proximity to existing inhabited houses and a secondary school dictates that any grant of planning will be subject to the normal standard conditions that will control work days, hours of work, noise, fugitive dust, traffic management, vibration, delivery and storage of construction materials and measures to prevent the soiling of the public road.

The development is currently programmed to take circa 12 months to complete with the heavier elements such as foundations, block works and roofing projected to take <4 months. It is intended that the work will be undertaken in the following stages:

- (17) Site set up and establishment including safety hoarding around site periphery.
- (18) Excavation of a short internal road with clean hardcore aggregate– construction road
- (19) Marking out of site services on the ground.
- (20) Marking out of house locations.
- (21) Digging foundations and groundwork's
- (22) Importing foundation aggregates.
- (23) Pouring steel reinforced concrete foundations in shuttered forms.
- (24) Block work including small scale on site concrete mixing on mixing pads.
- (25) Roofing.
- (26) Windows and doors.
- (27) First fix electrical, plumbing and carpentry.
- (28) Internal and external scratch coats and plastering including small scale on site render mixing on mixing pads.
- (29) Second fix electrical, plumbing and carpentry.
- (30) Finishing external groundwork's and landscaping.
- (31) Commissioning and decorating.
- (32) Landscaping and planting in common green areas

The resources required on the project will be similar to any housing construction project of this size, nature and scale and it is envisaged that the following plant will be required on site:

- 1 No. 3, 12 and 16 ton excavator and attachments
- 1 No. 6 ton dumper
- 1 No. 14m teleporters
- 1 No. cement mixer
- 1 No. 5 ton vibrating roller – foundations and roads
- 1 No. whacker plates
- 6 and 8 wheeler tipper lorries (as required for deliveries of aggregates).

The aggregates for the purposes of construction will only be stored adjacent to the construction area

which is industry standard and will be delivered as required in 16 and 20 wheeler trucks as required.

No maintenance of heavy plant will occur on site with all preventative maintenance carried out prior to entry to the site which is standard practice for logistical reasons.

Excavated material will not be stockpiled on site but will be landscaped and reseeded as soon as possible within the existing site boundary to avoid the economic costs associated with double handling. Any excess soil and sub soil will be exported off site by a licensed haulier to a licensed facility for recycling / disposal which is industry standard.

All empty packaging will be stored in appropriate containers for disposal as required which is now industry standard.

Batch concrete trucks are prohibited from the washing out of the drum on site which is now industry standard within both the extractive and construction industries due to the for potential liability e.g. The water pollution act.

The restricted species as listed in appendix of this report will not be utilised or introduced for the purposes of landscaping or any other purposes which is covered by the European Communities (Birds and Natural Habitats) Regulations 2011 and address / controls the problem of invasive species. A black list of unwanted species is set out in the Regulations. It will be an offence without a license, to release or allow to disperse or escape, to breed, propagate, import, transport, sell or advertise such species. The two regulations that deal specifically with these scheduled lists of species are Article 49 which prohibits the introduction, breeding, release or dispersal of certain species and Article 50 which prohibits dealing in and keeping certain species.

A watertight container will be provided for the storage of empty chemical containers which shall be removed off site and disposed of appropriately as required which is now industry standard.

No direct discharge of storm water to surface water is required with the project to connect to the Enniscrone storm water sewer.

All construction related materials and material will only be stored adjacent to the construction area for practical and logistical reasons.

The clean aggregated for the internal road construction will be imported and spread in a phased manner following directly behind the excavator which protects the exposed subsoil and would only be carried out during a dry weather period and is now industry standard.

No in stream works or drainage works are proposed or required. The urban location of the development dictates that no further street lighting is required.

Receiving Environment:

The urban street lit 0.239Ha green field infill development site is currently disused and is classified as GA1 (improved agricultural grassland) as the botany on site does not facilitate it being classified under any other category. The Cliff road runs along the Western side with residential structures and a car park to the North, residential structure to the South and a secondary school and amenity area to the East.

The development site is located in an area drained by the River Moy and all streams entering tidal water in Killala Bay between Benwee Head and Lenadoon Point, Co. Sligo, draining a total area of 2,345km². The largest urban centre in the catchment is Castlebar. The other main urban centers in this catchment are Ballina, Tubbercurry, Kiltimagh, Swinford, Foxford, Enniscrone and Crossmolina. The total population of the catchment is approximately 77,262 with a population density of 33 people per km² and the 2022 census indicated that the population of Enniscrone is 1,291. The lowland parts of the catchment are underlain by various types of limestone while the upland areas from the Ox Mountains and Croaghmoyle are underlain by a band of igneous and metamorphic rocks. Much of the lowland area south of Lough Conn exhibits a drumlin topography. There are extensive sand and gravel aquifers lying between Swinford and Charlestown to as far south as Knock, to the east of Ballina and southwest of Crossmolina more specifically the development site is located in the Leaffony 010 sub catchment and more specifically in the Quigabar 010 sub basin. Although it is located in the Quigabar sub basin its coastal location dictates that there are no direct or indirect hydro geological links between it and any fresh water system. There are no drains, streams or water courses within >100M of the proposed development site boundary. The coastal waters HWM is located 30M to the West, on the opposite side of the Cliff Road, at a much lower elevation relative to the proposed development site.

Quigabar 010 Sub Basin outlined in yellow



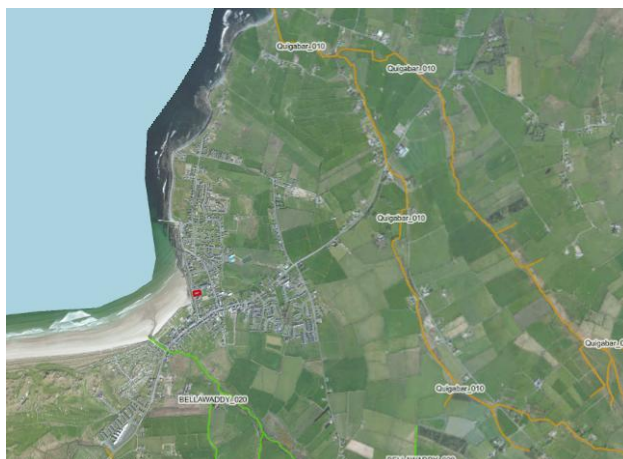
The proposed development site is located in an EPA “Area for Action” however there is currently no PAA report available.

EPA Area for Action



Under the WFD^{3rd} cycle the “Risk” to the Quigabar 010 River is currently “Under Review” and is currently classified as being of “Good” status under the WFD 3rd Cycle however there is currently no monitoring of the surface water quality in the stream and the classification are based on “Modeling”.

EPA Risk (WFD)



As there is no surface water monitoring of the stream no comment can be made on Ammonia (as N), Ortho P or TON.

The EPA Q values are more pertinent regarding empirical evidence when completing the AA process which is ratified by the detailed conservation objectives which make specific reference to the Q values when considering potential impacts on species however there is currently no EPA Q value stations on the Quigabar Stream.

The proposed development site is not located with the boundary of a Natura site nor is it contiguous to one and it is located on the extreme Eastern end of both the SAC and SPA. The Terrestrial section of the Killala Bay / Moy Estuary SAC 000458 is located 7.4M West of the development site boundary and the terrestrial section of the Killala Bay / Moy Estuary SPA 0004036 is located 29.6M to the West of the Development Site boundary. The proximity of the proposed development site in relation to the Natura sites is deceptive with respect to connectivity. The development site is segregated from the natura sites by the Cliff Road, a 1.2M concrete wall and a concrete promenade with steps.

Location of the SPA Natura Site Relative to the proposed development site.



Location of the SAC Natura Sites Relative to the proposed development site.



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Location of Natura Sites Relative to the proposed development site.



Location of Natura Sites Relative to the proposed development site.



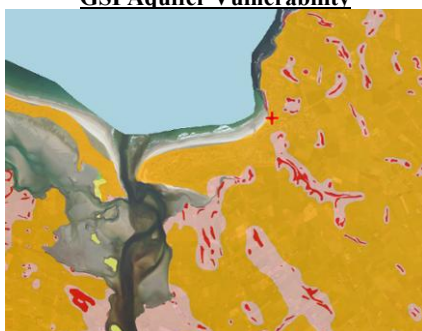
The underlying geology DUIL (Dinantian Pure Bedded Limestone) which contains a Locally important aquifer (LI) with High (H) vulnerability. The principle soil group on the site is classified by the GSI as “Made ground” with the underlying sub soil also classified as “Made Ground”. This reflects the urban nature and indicates that the soils and sub soils have been historically highly modified.

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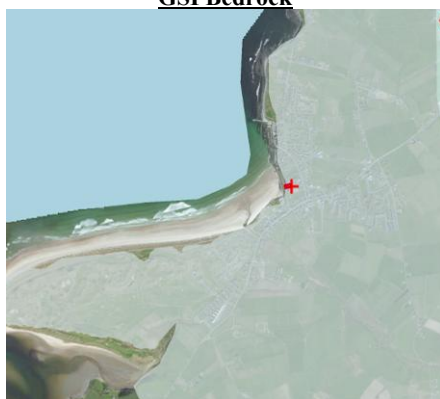
GSI Aquifer Potential



GSI Aquifer Vulnerability



GSI Bedrock



GSI Soils



GSI Sub Soils



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The relative risk to groundwater is considered low with respect to N, MRP and pathogens. Because of the proximity to the sea shore on made ground the GSI has not classified the near Surface Susceptibility, the near surface P susceptibility or the sub surface N susceptibility.

NSN



NSP



SSN



There are no PIP-P flow delivery points or flow delivery paths on or contiguous to the proposed

development site.

PIP-P Flow Delivery paths / points.



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The WFD / NRBMP indicate that the ground water status is “Good”, “Not at Risk” and not in an “Area for Action”.

EPA Ground Water Risk and Status.



Ground Water Status 2016 - 2021	Assessment Technique	Status Confidence	Value
Overall Groundwater Status			Good
Quantitative Groundwater Status			Good
Saline (or Other) Intrusions Test			Good
Impact of Groundwater on Surface Water Ecological/Quantitative Status Test			Good
Groundwater Dependent Ecosystems (GWDTE) - Quantitative Assessment Test			Good
Water Balance Test			Good
Chemical Groundwater Status			Good
Saline (or Other) Intrusions Test			Good

Ground Water Status 2016 - 2021	Assessment Technique	Status Confidence	Value
Impact of Groundwater on Surface Water Ecological/Chemical Status Test			Good
Groundwater Dependent Ecosystems (GWDTE) - Chemical Assessment Test			Good
Drinking Water Protected Area Test			Good
General Chemical Assessment Test			Good

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Parameter	Station Name	Period	Indicative Quality	Trend	Dist to Threshold
Ammonia-Total (as N)	Kilasser	Annual	Good	Upwards	Far
Chloride	Kilasser	Annual	Good	Downwards	Far
Conductivity @25°C	Kilasser	Annual	Good	Upwards	Far
Nitrate (as NO3)	Kilasser	Annual	Good	Downwards	Far
ortho-Phosphate (as P) - unspecified	Kilasser	Annual	Good	None	Far

The Killala Bay coastal waters are classified by the EPA under the WFD as being of Good Status and “Not At Risk”.

Coastal Water Risk and Status



Coastal Water Status 2016 - 2021	Assessment Technique	Status Confidence	Value
Ecological Status or Potential	Monitoring	high confidence	Good
Biological Status or Potential			Good
Invertebrate Status or Potential			Good
Hydro morphological Conditions			Good
Supporting Chemistry Conditions			High

Coastal Water Status 2016 - 2021	Assessment Technique	Status Confidence	Value
General Conditions			High
Nutrient Conditions			High
Nitrogen Conditions			High

The CFRAM maps indicate that the development site is not located in an indicative high end future 1% or 0.1% AEP coastal flood risk area.

CFRAM High End future scenario coastal Mapping



There are no geological features (karst features, caves or sink holes) within >250M from the development site boundary.

The air quality in the area is described as very good (zone D) which translates to the following, SO_2 0-49 μgM^{-3} (1hr average), NO_2 0-36 μgM^{-3} (1hr average), O_3 0-39 μgM^{-3} (1hr average) and PM_{10} 0-19 μgM^{-3} (24hr average).

2 Plot History and Current Land Use:

The proposed urban street lit infill development site is disused.

1.3 ECOLOGICAL SURVEY

(See maps)

1.3.1 Ecological survey :

The dominant habitats on site is classified as;

GA1 – Improved agricultural grassland (disused)

Constraints

- In salmonid spawning areas, in-stream works are generally not permitted during the period October – March (inclusive), as this is the sensitive time for spawning.
- Otter surveys can be undertaken at any time of year but are dependant on water levels.
- The optimal survey season for White-clawed Crayfish is from July to September. Surveys and removal operations should be avoided in the period when females are releasing young (late May-July). It is also recommended to avoid surveys in the period from December to the end of March as efficiency of searches is very low.
- Any surveys for the overwintering avian species in the Study Area must be carried out in the winter bird season (October-March).

1.3.2 Habitats

None of the habitats as listed as qualifying interest are present on or contiguous to the urban development footprint.

Estuaries [1130]

Mudflats and sandflats not covered by seawater at low tide [1140]

Annual vegetation of drift lines [1210]

Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]

Salicornia and other annuals colonising mud and sand [1310]

Atlantic salt meadows (*Glaucopuccinellietalia maritima*) [1330]

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]

Wetland and Waterbirds [A999]

There is no prospect of the development site reverting to any of the QI habitats.

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1.3.3 Fauna.

Phoca vitulina (Harbour Seal) [1365] will not utilise the development site in any fashion due to its urban location and the 1.5M wall which separated the development site from the SAC boundary.

1.3.4 Avian species.

During the survey only the more ubiquitous species were noted.

The Special Conservation Interests (SCI) listed for the SPA are:

Ringed Plover (*Charadrius hiaticula*) [A137]

Golden Plover (*Pluvialis apricaria*) [A140]

Grey Plover (*Pluvialis squatarola*) [A141]

Sanderling (*Calidris alba*) [A144]

Dunlin (*Calidris alpina*) [A149]

Bar-tailed Godwit (*Limosa lapponica*) [A157]

Curlew (*Numenius arquata*) [A160]

Redshank (*Tringa totanus*) [A162]

The species are all overwintering with no breeding within the Natura site.

There are no suitable habitats on the urban street lit site for the resting, loafing, foraging or roosting.

The continual anthropogenic activity combined with potential predation from felines and canines prohibit the species from using the development site or any areas contiguous to it.

1.3.5 Invertebrates.

Vertigo angustior (Narrow-mouthed Whorl Snail) [1014] no suitable habitat on the development site for the species. The soils and subsoils are described as “Made Ground” by the GSI.

1.3.6 Aquatic species.

Petromyzon marinus (Sea Lamprey) [1095] would not be anticipated on or contiguous to the development site boundary due to its habitat requirements.

Paul Neary B.Sc., M.Sc.

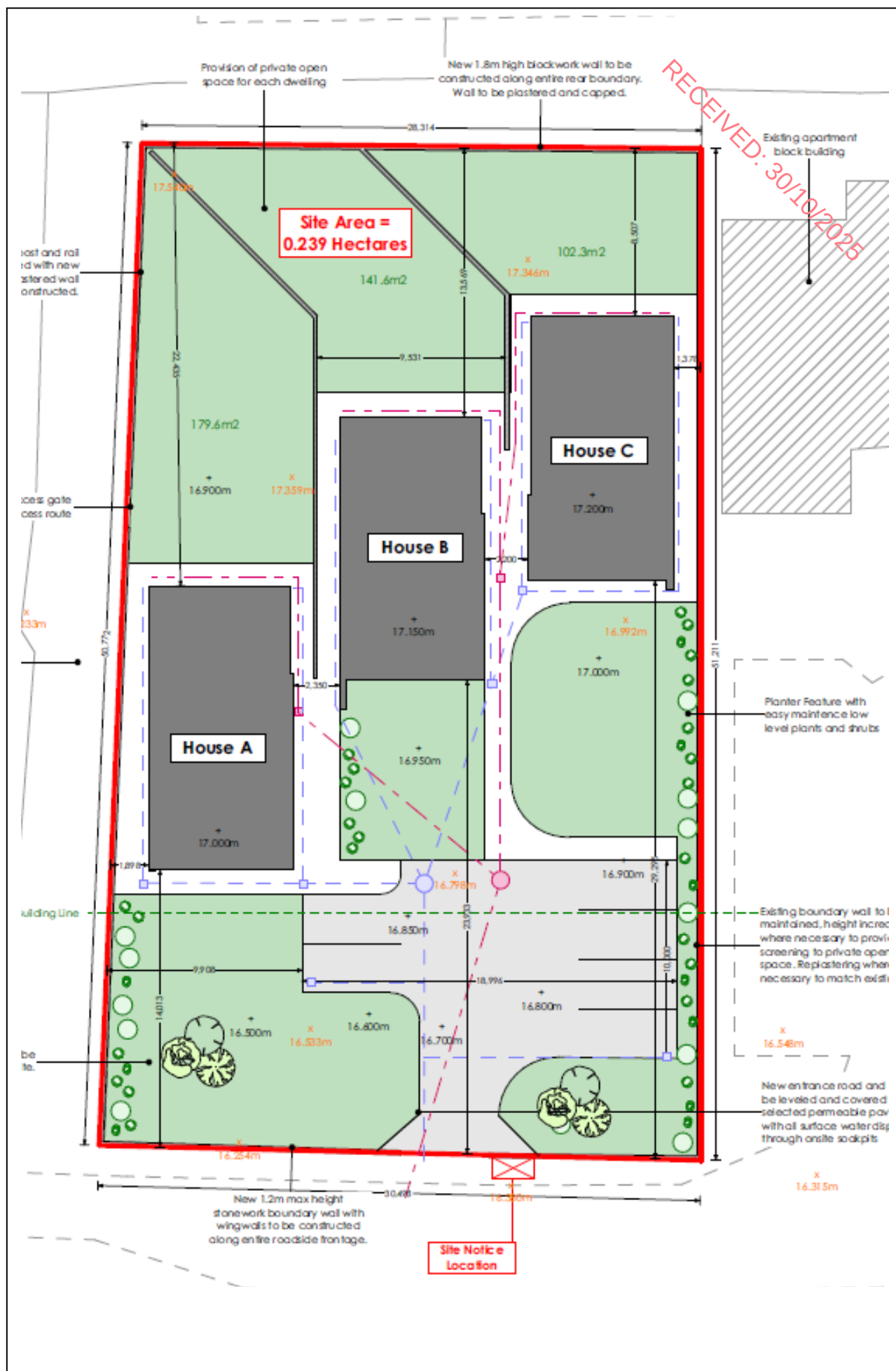
**PL321 (code 00805)

** These codes indicate that Paul Neary is an approved environmentalist by NPWS / Duchas / Dept. of Agriculture for the carrying out of ecological assessments on NHA's, SAC's, SPA's, pNHA's and National Parks and the creation of management plans and frame work plans on the afore mentioned.

HABITAT MAP



- Scrub WS1 
- Wet Grassland (WS4) 
- Improved Agricultural Grassland (GA1) 
- Upland eroding (FL1) 
- Hedgerow (WL1) 
- Buildings and other artificial surfaces (BL1) 
- Amenity Grassland (Disused) GA2 



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APPENDIX D

Table 1 General characteristics of the various Biological Quality Classes

Quality Classes	Class A		Class B	Class C	Class D	
<i>Quality Ratings (Q)</i>	Q5	Q4	Q3-4	Q3	Q2	Qi
<i>Pollution Status</i>	Pristine, Unpolluted	Unpolluted	Slight Pollution	Moderate Pollution	Heavy Pollution	Gross Pollution
<i>Organic Waste Load</i>	None	None	Light	Considerable	Heavy	Excessive
<i>Maximum B.O.D.</i>	Low (< 3 mg/l)	Low (< 3 mg/l)	Occasionally elevated	High at times	Usually high	Usually very high
<i>Dissolved Oxygen</i>	Close to 100%	80%- 120%	Fluctuates from <80%to>120%	Very unstable Potential fish-kills	Low, sometimes zero	Very low, often zero
<i>Annual Median ortho- Phosphate</i>	-0.015 mg P/l	-0.030 mg P/l	-0.045 mg P/l	-0.070 mg P/l	usually > 0.1 mg P/l	usually > 0.51 mg P/l
<i>Siltation</i>	None	May be light	Maybe light	May be considerable	Usually heavy	Usually very heavy and anaerobic
<i>'Sewage Fungus '</i>	Never	Never	Never	May be some	Usually abundant	May be abundant
<i>Filamentous Algae</i>	Limited development	Considerable growths Diverse communities	<i>Cladophora</i> may be abundant	<i>Cladophora</i> may be excessive	May be abundant	Usually none
<i>Macrophytes</i>	Diverse communities Limited growths	Diverse communities Considerable growths	Reduced diversity Luxuriant growths	Limited diversity Excessive growths	Tolerant species only. May be abundant.	Usually none or tolerant species only.
<i>Macroinvertebrates (from shallow riffles)</i>	Diverse communities. Normal density. Sensitive forms usually numerous.	High diversity. Increased density. Sensitive forms scarce or common.	Very high diversity. Very high density. Sensitive forms scarce.	Sensitive forms absent. Tolerant forms common. Low diversity.	Tolerant forms only. Very low diversity.	Most tolerant forms. Minimal diversity.
<i>Water Quality</i>	Highest quality	Fair quality	Variable quality	Doubtful quality	Poor quality	Bad quality
<i>Abstraction Potential</i>	Suitable for all	Suitable for all	Potential problems	Advanced treatment	Low grade abstractions	Extremely limited
<i>Fishery Potential</i>	Game fisheries	Good game fisheries	Game fish at risk	Coarse fisheries	Fish usually absent	Fish absent
<i>Amenity value</i>	Very high	High	Considerable	Reduced	Low	Zero

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APPENDIX E

EVALUATION AND IMPACT MAGNITUDE TABLES

2.1 Ecological Site Evaluation Criteria (derived from NRA and IEEM EcIA Guidelines)

Ecological value		Criteria
Internationally important (A sites)		EU Annex habitat in an internationally designated conservation area (or qualifying site; or site with a proposed designation)
		A viable area of a habitat type listed in Annex I of the Habitats Directive, or smaller areas of such habitat which are essential to maintain the viability of a larger whole.
		Non-designated high quality habitat which equates to an EU Annex I priority habitat
Nationally important (B sites)		A regularly occurring, nationally significant population / number of any internationally important species.
		EU Annex habitat in a designated (or proposed) NHA.
		Non-designated good example of Annex I habitat (Under EU habitats Directive)
Locally important	High value (C sites)	Any habitat which may have been formerly classified as EU Annex I quality, but which has been subsequently highly modified as a result of change in the physical environment or damaged. Such a habitat may be still be classified as an Annex habitat on the basis of the presence of one or more character plant species, but can no longer be considered a good example of that habitat type
		Sites containing semi-natural habitat types with high biodiversity in a local context, with high degree of intrinsic naturalness.
		Locally rare habitats or species
	Moderate value (D sites)	Sites containing some semi-natural habitat or locally important for wildlife
	Low value (E sites)	Highly modified or artificial habitats with low intrinsic ecological value in terms of biodiversity
		Artificial habitats which provide some secondary wildlife habitat of local value

NRA EcIA criteria for assessing impact magnitude

Impact Magnitude	Internationally important (A sites)	Nationally important (B sites)	High value, locally important (C sites)	Moderate value, locally important (D sites)	Low value, locally important (E sites)
Profound negative	Any permanent impacts	Permanent impacts on a large part of a site			
Significant negative	Temporary impacts on a large part of a site	Permanent impacts on a small part of a site	Permanent impacts on a large part of a site		
Moderate Negative	Temporary impacts on a small part of a site	Temporary impacts on a large part of a site	Permanent impacts on a small part of a site	Permanent impacts on a small part of a site	Permanent impact on a site if part of a designated site
Slight Negative		Temporary impacts on a small part of a site	Temporary impacts on a large part of a site	Permanent impacts on a small part of a site	Permanent impacts on a large part of a site
Imperceptible Negative			Temporary impacts on a small part of the site	Temporary impacts on a small part of the site	Permanent impacts on a small part of a site
Neutral	No impacts	No impacts	No impacts	No impacts	No impacts
Slight Positive				Permanent beneficial impacts on a small part of a site	Permanent beneficial impacts on a large part of a site

For ecological evaluation criteria see Table 5 above

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APPENDIX F

THIRD SCHEDULE

Non-native species subject to restrictions under Regulations 49 and 50

Part 1: PLANTS

First column	Second column	Third column
Common name	Scientific name	Geographical application
American skunk-cabbage	<i>Lysichiton tneiticum</i>	Throughout the State
A red alga	<i>Gratdopia doryphora</i>	Throughout the State
Brazilian giant-rhubarb	<i>Gunnera manicata</i>	Throughout the State
Broad-leaved rush	<i>Juncus planifolius</i>	Throughout the State
Cape pondweed	<i>Aponogeton distachyos</i>	Throughout the State
Cord-grasses	<i>Spartina</i> (all species and hybrids)	Throughout the State
Curly waterweed	<i>Lagarosiphon major</i>	Throughout the State
Dwarf eel-grass	<i>Zostera japonia</i>	Throughout the State
Fanwort	<i>Cabomba caroliniana</i>	Throughout the State
Floating pennywort	<i>Hydrocotyle ratmnculoides</i>	Throughout the State
Fringed water-lily	<i>Nymphoides peltata</i>	Throughout the State
Giant hogweed	<i>Heracleum mantegazzianum</i>	Throughout the State
Giant knotweed	<i>Fallopia sachalinensis</i>	Throughout the State
Giant-rhubarb	<i>Gunnera tinctoria</i>	Throughout the State
Giant salvinia	<i>Salvinia molesta</i>	Throughout the State
Himalayan balsam	<i>Impatiens glandulifera</i>	Throughout the State
Himalayan knotweed	<i>Persicaria wallichii</i>	Throughout the State
Hottentot -fig	<i>Carpobrotus edulis</i>	Throughout the State
Japanese knotweed	<i>Pallopa japonica</i>	Throughout the State
Large-flowered waterweed	<i>Egeria densa</i>	Throughout the State
Mile-a-minute weed	<i>Persicaria perfoliata</i>	Throughout the State
New Zealand pigmyweed	<i>Crassula helmsii</i>	Throughout the State
Parrot's feather	<i>Myriophyllum aquaticum</i>	Throughout the State
Rhododendron	<i>Rhododendron ponticum</i>	Throughout the State
Salmonberry	<i>Rubus spectabilis</i>	Throughout the State
Sea-buckthorn	<i>Hippophae rhamnoides</i>	Throughout the State
Spanish bluebell	<i>Hyacinthoides hispanica</i>	Throughout the State
Three-cornered leek	<i>Allium triquetrum</i>	Throughout the State
Wakame	<i>Undaria pinnatifida</i>	Throughout the State
Water chestnut	<i>Trapa natans</i>	Throughout the State
Water fern	<i>Azolla filiculoides</i>	Throughout the State
Water lettuce	<i>Pistia stratiotes</i>	Throughout the State
Water-primrose	<i>Ludwigia</i> (all species)	Throughout the State
Waterweeds	<i>Elodea</i> (all species)	Throughout the State
Wire weed	<i>Sargassum muticum</i>	Throughout the State

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Part 2: ANIMALS

A: animals to which Regulations 49 and 50 apply throughout the State or in particular places or categories of places.

First column	Second column	Third Column
Common name	Scientific name	Geographical application
A colonial sea squirt	<i>DJdemnum spp.</i>	Throughout the State
A colonial sea squirt	<i>Perophora japonica</i>	Throughout the State
All freshwater crayfish species except the white-clawed crayfish	<i>All freshwater crayfish species except Austropotamobius paliipes</i>	Throughout the State
American bullfrog	<i>Ranu catesbeiana</i>	Throughout the State
American mink	<i>Neovison vison</i>	Throughout the State
American oyster drill	<i>Urosalpinx dnerea</i>	Throughout the State
Asian oyster drill	<i>Ceratoslonia inornalum</i>	Throughout the State
Asian rapa whelk	<i>Rapana venosa</i>	Throughout the State
Asian river clam	<i>Corbiculu flunrinea</i>	Throughout the State
Bay barnacle	<i>B alarms improvisus</i>	Throughout the State
Black rat	<i>Rattus reams</i>	Offshore islands oniy
Brown hare	<i>Lepus europaeus</i>	Throughout the State
Brown rat	<i>Rattits norvegicus</i>	Offshore islands oniy
Canada goose	<i>Branta canadensis</i>	Throughout the State
Carp	<i>Cyprinus carpio</i>	Throughout the State
Chinese mitten crab	<i>Erioeheir sinensis</i>	Throughout the State
Chinese water deer	<i>Hydropotes inermis</i>	Throughout the State
Chub	<i>Leuciscus cephalus</i>	Throughout the State
Common toad	<i>Bufo bufo</i>	Throughout the State
Coypu	<i>Myocastor coy pus</i>	Throughout the State
Dace	<i>Leuciscus leuciscus</i>	Throughout the State
Freshwater shrimp	<i>Dikero gamin arus villosus</i>	Throughout the State
Fox	<i>Vulpes vulpes</i>	Offshore islands only
Grey squirrel	<i>Sciurus cnrolinensis</i>	Throughout the State
Greylag goose	<i>Anser anser</i>	Throughout the State
Harlequin Ladybird	<i>Harmonia axyridis</i>	Throughout the State
Hedgehog	<i>Erinaceus eiiropaeus</i>	Offshore islands only
Irish stoat	<i>Musteta erminea hibemiais</i>	Offshore islands only
Japanese skeleton shrimp	<i>Caprella mutica</i>	Throughout the State
Muntjac deer	<i>Muntiacus reevesi</i>	Throughout the State
Muskrat	<i>Ondatra zibethicus</i>	Throughout the State
Quagga Mussel	<i>Dreissena rostrifonnis</i>	Throughout the State
Roach	<i>Rutilus rutilus</i>	Throughout the State
Roe deer	<i>Capreolus capreolus</i>	Throughout the Stale
Ruddy duck	<i>Oxyuru jamaicensis</i>	Throughout the State

First column	Second column	Third Column
Siberian chipmunk	<i>Tamias sibiricus</i>	Throughout the State
Slipper limpet	<i>Crepidula fornicata</i>	Throughout the State
Stalked sea squirt	<i>Styela clava</i>	Throughout the State
Tawny owl	<i>Strix aluco</i>	Throughout the State
Wild boar	<i>Sus scrofa</i>	Throughout the State
Zebra mussel	<i>Dreissena polymorpha</i>	Throughout the State

B: animals to which specified provisions of Regulations 49 and 50 apply.

First column	Second column	Third Column
Common name	Scientific name	Geographical application
Fallow deer	<i>Dama dama</i>	Throughout the State
Sika deer	<i>Cervus nippon</i>	Throughout the State

Part 3: VECTOR MATERIALS

First column	Second column	Third Column
Vector material	Species referred to	Geographical application
Blue mussel (<i>Mytilus edulis</i>) seed for aquaculture taken from places (including places outside the State) where there are established populations of the slipper limpet (<i>Crepidula fornicata</i>) or from places within 50 km. of such places	Mussel (<i>Mytilus edulis</i>) Slipper limpet (<i>Crepidula fornicata</i>)	Throughout the State
Soil or spoil taken from places infested with Japanese knotweed (<i>Fallopia japonica</i>), giant knotweed (<i>Fallopia sachalinensis</i>) or their hybrid Bohemian knotweed (<i>Fallopia x bohemica</i>)	Japanese knotweed (<i>Fallopia japonica</i>) Giant knotweed (<i>Fallopia sachalinensis</i>) Bohemian knotweed (<i>Fallopia x bohemica</i>)	Throughout the State

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APPENDIX G

Data available from EPA

<https://gis.epa.ie/EPAMaps/Water>

Data Also Available on

<https://gis.epa.ie/EPAMaps/Water>

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WFD Cycle 2

Catchment Moy & Killala Bay

Subcatchment Leaffony_SC_010

Code 34_11



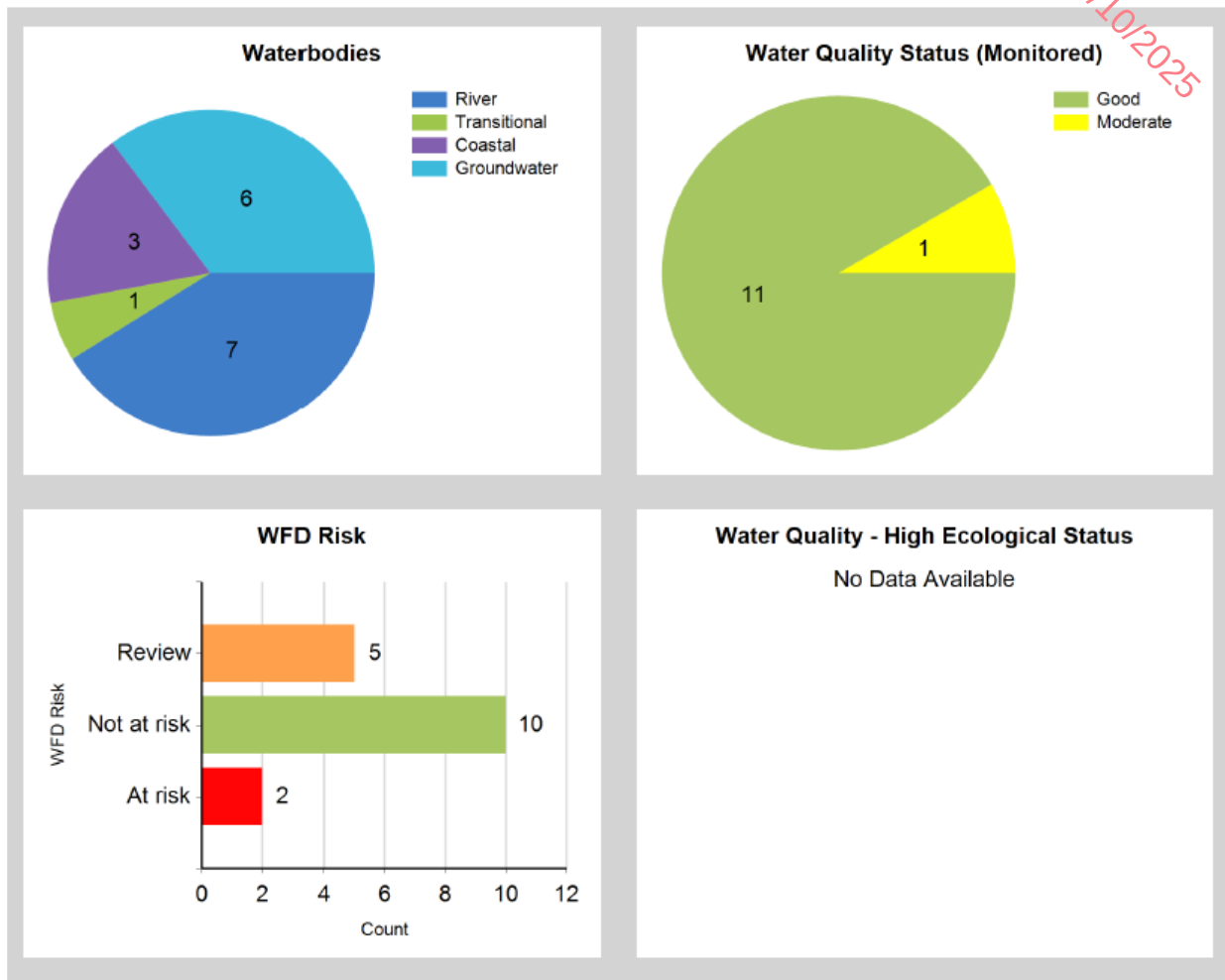
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Generated on: 28 Feb 2020

Assessment Purpose

This assessment has been produced as part of the national characterisation programme undertaken for the Water Framework Directive river basin management planning. It has been led by the EPA, with input from Local Authorities and other public bodies.

The characterisation assessments are automatically generated from the information stored in the WFD Application. The assessments may change as information is updated in the WFD application. Users should ensure that they have the most up to date information by downloading the latest assessment before use.



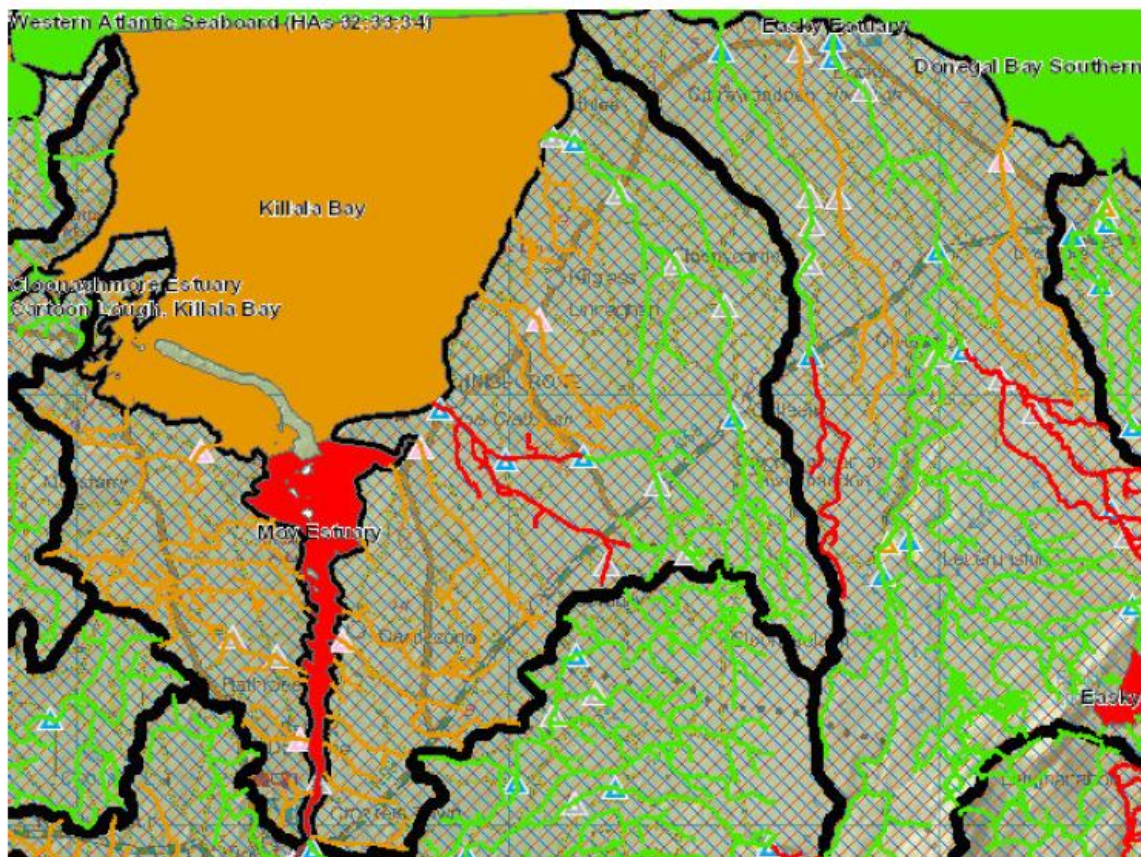
Evaluation of Priority Subcatchment Issues

Of the seven river water bodies in the subcatchment, three are unassigned and will need an investigative assessment to determine the risk status, and three are Not at Risk. One water body, Bellawaddy_020, is At Risk due to Moderate ecological status, driven by invertebrates. Nutrients are the significant issue.

Monitoring data suggests that downstream pressures are impacting. Agriculture and Urban Run-off from Inishcrone will be focused on in the investigative assessment.

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Map Subcatchment Risk Map

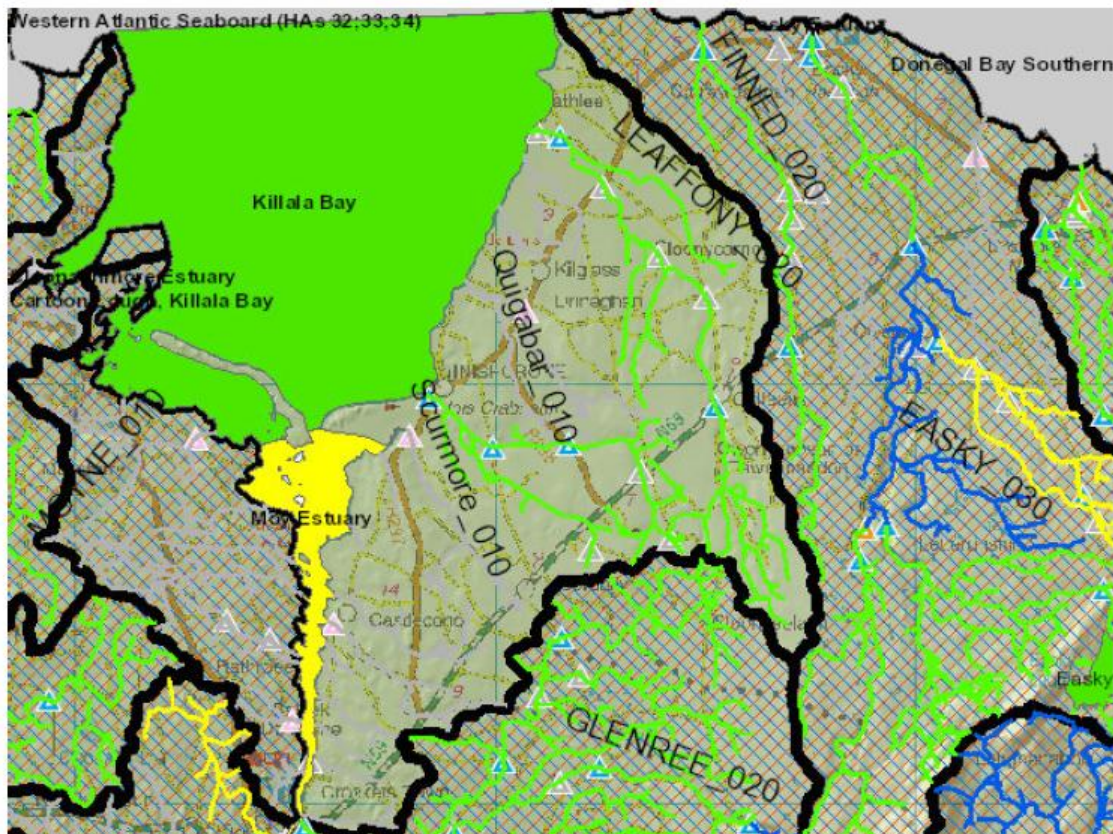


River And Lake Waterbodies: WFD Risk

The following river and lake waterbodies are in the subcatchment.

Code	Name	Type	WFD Risk	Significant Pressure
IE_WE_34B050300	BELLAWADDY_020	River	At risk	Yes
IE_WE_34D310990	DOOYEAGHNY_or_CLO ONLOUGHAN_010	River	Review	Yes
IE_WE_34Q070710	Quigabar_010	River	Review	Yes
IE_WE_34S610980	Scurmore_010	River	Review	Yes
IE_WE_34B050150	BELLAWADDY_010	River	Not at risk	No
IE_WE_34L010100	LEAFFONY_010	River	Not at risk	No
IE_WE_34L010260	LEAFFONY_020	River	Not at risk	No

Map Subcatchment Water Quality Status Map



River And Lake Waterbodies: Water Quality Status

The water quality status of river and lake waterbodies in the subcatchment is as follows.

Name	2007-09	2010-12	2010-15	2013-18
BELLAWADDY_010	Good	Good	Good	Good
BELLAWADDY_020	Good	Poor	Moderate	Good
DOOYEAGHNY_or_CLOONLOUGHAN_010	Unassigned	Unassigned	Unassigned	Unassigned
LEAFFONY_010	Good	Good	High	Good
LEAFFONY_020	Good	Good	Good	Good
Quigabar_010	Unassigned	Unassigned	Unassigned	Unassigned
Scurmore_010	Unassigned	Unassigned	Unassigned	Unassigned

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Potentially Dependent Transitional and Coastal Waterbodies

The Transitional and Coastal waterbodies listed below intersect spatially with river and lake waterbodies in the subcatchment ...

Code	Name	Type	Local Authority	WFD Risk
IE_WE_250_0000	Western Atlantic Seaboard (HAS 32;33;34)	Coastal	Mayo County Council	Not at risk
IE_WE_420_0000	Killala Bay	Coastal	Mayo County Council	Review
IE_WE_430_0000	Donegal Bay Southern	Coastal	Sligo County Council	Not at risk
IE_WE_420_0300	Moy Estuary	Transitional	Mayo County Council	At risk

Potentially Dependent Groundwater Waterbodies

The groundwaters listed below intersect spatially with river and lake waterbodies in the subcatchment ...

Code	Name	Type	Local Authority	WFD Risk
IE_WE_G_0034	Foxford	Groundwater	Mayo County Council	Not at risk
IE_WE_G_0035	Ballina	Groundwater	Mayo County Council	Not at risk
IE_WE_G_0035	Ballina	Groundwater	Mayo County Council	Review
IE_WE_G_0048	Collooney	Groundwater	Sligo County Council	Not at risk
IE_WE_G_0048	Collooney	Groundwater	Sligo County Council	Review
IE_WE_G_0049	Easky West	Groundwater	Sligo County Council	Not at risk
IE_WE_G_0049	Easky West	Groundwater	Sligo County Council	Review
IE_WE_G_0050	Easky East	Groundwater	Sligo County Council	Not at risk
IE_WE_G_0050	Easky East	Groundwater	Sligo County Council	Review
IE_WE_G_0113	Ballina Gravels Group 1	Groundwater	Mayo County Council	Not at risk
IE_WE_G_0113	Ballina Gravels Group 1	Groundwater	Mayo County Council	Review

Protected Areas intersecting River and Lake Waterbodies

The Protected Areas listed below intersect spatially with river and lake waterbodies in the subcatchment ...

Code	Name	Type	Waterbody Name	Association Type
IEPA1_WE_G_003 4	Foxford	Drinking Water	BELLAWADDY_010	Within Protected Area
IEPA1_WE_G_003 4	Foxford	Drinking Water	BELLAWADDY_020	Within Protected Area
IEPA1_WE_G_003 4	Foxford	Drinking Water	DOOYEAGHNY_or_CL OONLOUGHAN_010	Within Protected Area
IEPA1_WE_G_003 4	Foxford	Drinking Water	Quigabar_010	Within Protected Area
IEPA1_WE_G_003 4	Foxford	Drinking Water	Scurmore_010	Within Protected Area
IEPA1_WE_G_003 5	Ballina	Drinking Water	DOOYEAGHNY_or_CL OONLOUGHAN_010	Within Protected Area
IEPA1_WE_G_004 9	Easky West	Drinking Water	BELLAWADDY_010	Within Protected Area
IEPA1_WE_G_004 9	Easky West	Drinking Water	BELLAWADDY_020	Within Protected Area
IEPA1_WE_G_004 9	Easky West	Drinking Water	LEAFFONY_010	Within Protected Area
IEPA1_WE_G_004 9	Easky West	Drinking Water	LEAFFONY_020	Within Protected Area
IEPA1_WE_G_004 9	Easky West	Drinking Water	Quigabar_010	Within Protected Area
IEPA1_WE_G_0113	Ballina Gravels Group 1	Drinking Water	DOOYEAGHNY_or_CL OONLOUGHAN_010	Within Protected Area

Pressures

Below is a list of all significant pressures identified in the subcatchment.

Code	Name	WFD Risk	Pressure Category	Pressure Sub Category	Created In
IE_WE_420_0300	Moy Estuary	At risk	Agriculture	Pasture	WFD Cycle 2
IE_WE_420_0000	Killala Bay	Review	Anthropogenic Pressures	Unknown	WFD Cycle 2
IE_WE_34D310990	DOOYEAGHNY_or_CLOONLOUGHAN_010	Review	Anthropogenic Pressures	Unknown	WFD Cycle 2
IE_WE_34Q070710	Quigabar_010	Review	Agriculture	Agriculture	WFD Cycle 2
IE_WE_34B050300	BELLAWADDY_020	At risk	Agriculture	Pasture	WFD Cycle 2
IE_WE_420_0300	Moy Estuary	At risk	Urban Waste Water	Agglomeration PE > 10,000	WFD Cycle 2
IE_WE_420_0300	Moy Estuary	At risk	Domestic Waste Water	Waste Water discharge	WFD Cycle 2
IE_WE_G_0048	Collooney	Review	Anthropogenic Pressures	Unknown	WFD Cycle 2
IE_WE_34B050300	BELLAWADDY_020	At risk	Urban Run-off	Diffuse Sources Run-Off	WFD Cycle 2
IE_WE_420_0300	Moy Estuary	At risk	Urban Waste Water	Agglomeration PE of 1,001 to 2,000	WFD Cycle 2
IE_WE_34S610980	Scurmore_010	Review	Anthropogenic Pressures	Unknown	WFD Cycle 2

Further Characterisation Actions

The following further characterisation actions have been identified. These are necessary to help understand more fully issues in the subcatchment and their likely cause.

Code	Name	Action	Responsible Organisation	Created In
IE_WE_34S610980	Scurmore_010	IA3 Determination of Water Quality (unassigned waterbody)	Local Authority Waters Programme (LAWPRO)	WFD Cycle 2
IE_WE_34B050300	BELLAWADDY_020	IA7 Multiple Sources in Multiple Areas	Local Authority Waters Programme (LAWPRO)	WFD Cycle 2
IE_WE_34D310990	DOOYEAGHNY_or_CLOONLOUGHAN_010	IA3 Determination of Water Quality (unassigned waterbody)	Local Authority Waters Programme (LAWPRO)	WFD Cycle 2
IE_WE_34Q070710	Quigabar_010	IA3 Determination of Water Quality (unassigned waterbody)	Local Authority Waters Programme (LAWPRO)	WFD Cycle 2

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APPENDIX H

Site Name: Killala Bay/Moy Estuary SAC

Site Code: 000458 (Version 2015)

North of Ballina town, the River Moy flows to the sea via a long, narrow estuarine channel. After approximately 8 km, the estuary widens to form a north-facing triangular bay, with the towns of Inishcrone (Co. Sligo) and Killala (Co. Mayo) situated on the eastern and western shores, respectively. The estuary itself forms the County boundary along its northern part. A long sandy island (Bartragh Island) separates the south-western side of the bay from the open water. Much of the inner part of the bay is intertidal. The northern part shelves to approximately -10 m.

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):

[1130] Estuaries

[1140] Tidal Mudflats and Sandflats

[1210] Annual Vegetation of Drift Lines

[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts

[1310] Salicornia Mud

[1330] Atlantic Salt Meadows

[2110] Embryonic Shifting Dunes

[2120] Marram Dunes (White Dunes)

[2130] Fixed Dunes (Grey Dunes)*

[2190] Humid Dune Slacks

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

[1095] Sea Lamprey (*Petromyzon marinus*)

[1365] Common (Harbour) Seal (*Phoca vitulina*)

Extensive sandflats and mudflats are exposed in the estuary and bay at low tide. For the most part, these flats are unvegetated, but mats of Eelgrass (*Zostera spp.*), Beaked Tasselweed (*Ruppia maritima*) and green algae (*Enteromorpha spp.*) occur which provide important feeding material for birds. The estuary is generally in a natural state and is considered to be one of the best examples of a largely unpolluted system in Ireland.

The dune systems at Bartragh Island, Inishcrone and Ross, to the north-west, are well-developed and constitute good examples of dunes with a rich and diverse flora. Dunes dominated by Marram (*Ammophila arenaria*) are located at all three sub-sites. At Enniscrone they stretch the length of the strand and are particularly welldeveloped towards the western end. They are found along the northern stretch of Ross and also run the length of Bartragh Island. Other species found growing in this habitat include Cat's-ear (*Hypochoeris radicata*), Smooth Sow-thistle (*Sonchus oleraceus*) and Groundsel (*Senecio vulgaris*). Associated with the Marram dunes are embryonic foredunes and these are particularly well-represented at Enniscrone. The most commonly encountered species in the foredunes include Sand Couch (*Elymus farctus*), Sea Sandwort (*Honkenya peploides*), Sea Rocket (*Cakile maritima*) and Lyme Grass (*Leymus arenarius*). Although much of the fixed dune area has been developed as golf course or improved for agriculture, the site still contains a relatively large area of intact fixed dunes, a priority habitat listed on Annex I of the E.U. Habitats Directive. Species recorded include Red Fescue (*Festuca rubra*), Lady's Bedstraw (*Galium verum*), Kidney Vetch (*Anthyllis*

vulneraria), Common Centuary (*Centaureum erythraea*), Sand Sedge (*Carex arenaria*), Harebell (*Campanula rotundifolia*), Wild Thyme (*Thymus praecox*), Fairy Flax (*Linum catharticum*), Common Bird's-foot-trefoil (*Lotus corniculatus*) and Pyramidal Orchid (*Anacamptis pyramidalis*). Bryophyte communities are well represented, with such species as *Brachythecium rutabulum*, *Homalothecium lutescens* and *Tortula ruraliformis*. Lichens (*Peltigera* spp.) are also frequent. Humid dune slacks occur at Ross. Species present include Jointed Rush (*Juncus articulatus*), Common Spike Rush (*Eleocharis palustris*), Water Mint (*Mentha aquatica*), Meadowsweet (*Filipendula ulmaria*), Creeping Willow (*Salix repens*), Silverweed (*Potentilla anserina*), orchids (*Dactylorhiza* spp.), Common Twayblade (*Listera ovata*) and the moss *Calliergon cuspidatum*. A similar species complement is found in the wet hollows at Enniscrone and there also appears to be some large slack-like areas to the rear of Bartragh Island. Saltmarshes are present in sheltered parts of the site, some of which occur in association with the dune systems. Species typical of Atlantic salt meadows commonly observed include Common Saltmarsh-grass (*Puccinellia maritima*), Thrift (*Armeria maritima*), Sea Aster (*Aster tripolium*) and Red Fescue. Occasionally Laxflowered Sea-lavender (*Limonium humile*) and Saltmarsh Flat-sedge (*Blysmus rufus*) are present, along with some stands of Sea Rush (*Juncus maritimus*). On the lower marshes, and extending out onto the most sheltered parts of the open mudflats, typical pioneering species such as glassworts (*Salicornia* spp.) and Annual Sea-blite (*Suaeda maritima*) occur. Elsewhere along the coastline are sandy beaches, shingle beaches and some bedrock shores which are occasionally backed by clay sea-cliffs, such as at Moyne. Species such as Sea Rocket, Colt's-foot (*Tussilago farfara*) and Sea Mayweed (*Matricaria maritima*) are indicative of the habitat 'annual vegetation of drift lines'. South-east of Killala town, Lough Meelick adds habitat diversity to the site. It is significant for the presence of the Thin-lipped Mullet, a fish which is only occasionally found in the region. A number of rare plants have been found in the site. Opposite-leaved Pondweed (*Groenlandia densa*), a species protected under the Flora (Protection) Order, 2015, has been recorded in the Moy Estuary, and Hoary Whitlowgrass (*Draba incana*), a Red Data Book species, has been recorded from sand dunes along the coast east of Killala town. The site holds populations of three species listed on Annex II of the E.U. Habitats Directive: Common Seal (maximum count of 108 in the all-Ireland survey of 2003); Sea Lamprey and Narrow-mouthed Whorl Snail (*Vertigo angustior*). The rare snail has been known at this site for over 100 years. It occurs in an area of wet marsh and this site represents one of the few remaining examples of *Vertigo angustior* in its marsh "phase". This species has been declining throughout much of its range due to loss of habitat, and in particular, drainage of wetlands. The site is very important for wintering waterfowl, with eight species having populations of national importance. These are as follows, with numbers referring to the average peaks over winters 1994/95 - 1997/98: Red-breasted Merganser (38), Ringed Plover (207), Grey Plover (200), Knot (429), Sanderling (135), Dunlin (1816), Bar-tailed Godwit (309) and Greenshank (19). Other notable populations include Golden Plover (1303) and Brent Goose (166). At times Brent Goose occur in numbers of international importance (>200). The presence of Golden Plover and Bar-tailed Godwit is of particular note as these species are listed on Annex I of the E.U. Birds Directive. This composite site has an excellent range of good quality coastal habitats, including a number listed on Annex I of the E.U. Habitats Directive. In particular, the dune complex at Bartragh Island is relatively undisturbed and is considered to be one of the best in the country in terms of its naturalness and intact state. The presence of the Annex II snail, *Vertigo angustior*, and the importance of the area for wintering waterfowl, including two Annex I Birds Directive species, adds further significance to this area. The site is extremely scenic and is a significant regional amenity area for its beaches and for fishing.

SITE SYNOPSIS

SITE NAME: KILLALA BAY/MOY ESTUARY SPA Versin date: 7.7.2014

SITE CODE: 004036

This large site comprises the estuary of the River Moy and the inner part of Killala Bay, including Lackan Bay and Rathfran Bay, in Counties Mayo and Sligo. It is a funnel-shaped estuary, c. 7 km wide at its outer limit. It is very well sheltered by a sandy island, Bartragh, and by a sandy peninsula that extends from Enniscrone on the eastern side. Extensive intertidal sand and mud flats are exposed at low tide. For the most part, these flats are unvegetated, but mats of Eelgrass (*Zostera* spp.), Beaked Tasselweed (*Ruppia maritima*) and green algae (*Ulva* spp.) occur, which provide important feeding material for waterfowl species.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Ringed Plover, Golden Plover, Grey Plover, Sanderling, Dunlin, Bar-tailed Godwit, Curlew and Redshank. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

The site is very important for wintering waterfowl and provides excellent feeding grounds for the birds, as well as high-tide roosts. Eight species have populations of national importance, i.e. Ringed Plover (245), Golden Plover (2,361), Grey Plover (221), Sanderling (123), Dunlin (2,073), Bar-tailed Godwit (366), Curlew (731) and Redshank (372) - all figures are mean peaks for the five year period 1995/96 to 1999/2000). A range of other species occurs, including Light-bellied Brent Goose (170), Shelduck (64), Wigeon (339), Teal (236), Red-breasted Merganser (44), Red-throated Diver (15), Oystercatcher (531), Lapwing (1,854) and Greenshank (24). The site is also used by Mallard (92), Turnstone (50), Grey Heron (21) and Cormorant (40). Substantial numbers of gulls are present at the site during winter, including Black-headed Gull (338), Common Gull (368), Herring Gull (336) and Great Black-backed Gull (120).

Killala Bay/Moy Estuary SPA is of high ornithological importance as it supports eight species that have populations of national importance, including a very substantial population of Grey Plover (3.4% of the all-Ireland total). The presence of Red-throated Diver, Golden Plover and Bar-tailed Godwit is of particular note as these species are listed on Annex I of the E.U. Birds Directive. Killala Bay/Moy Estuary is a Ramsar Convention site.

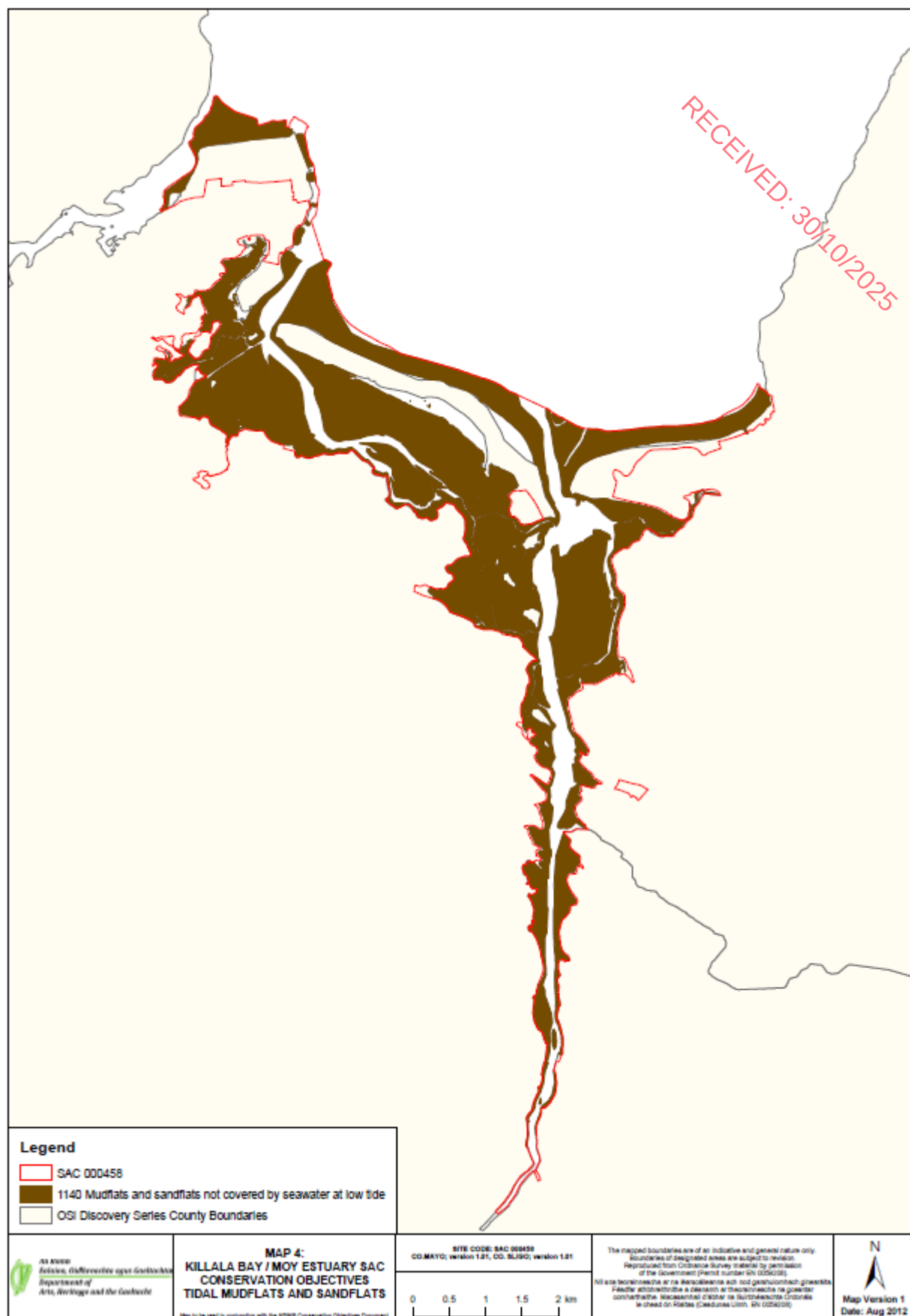
The Conservation Objectives used in the generation of this report are as follows.

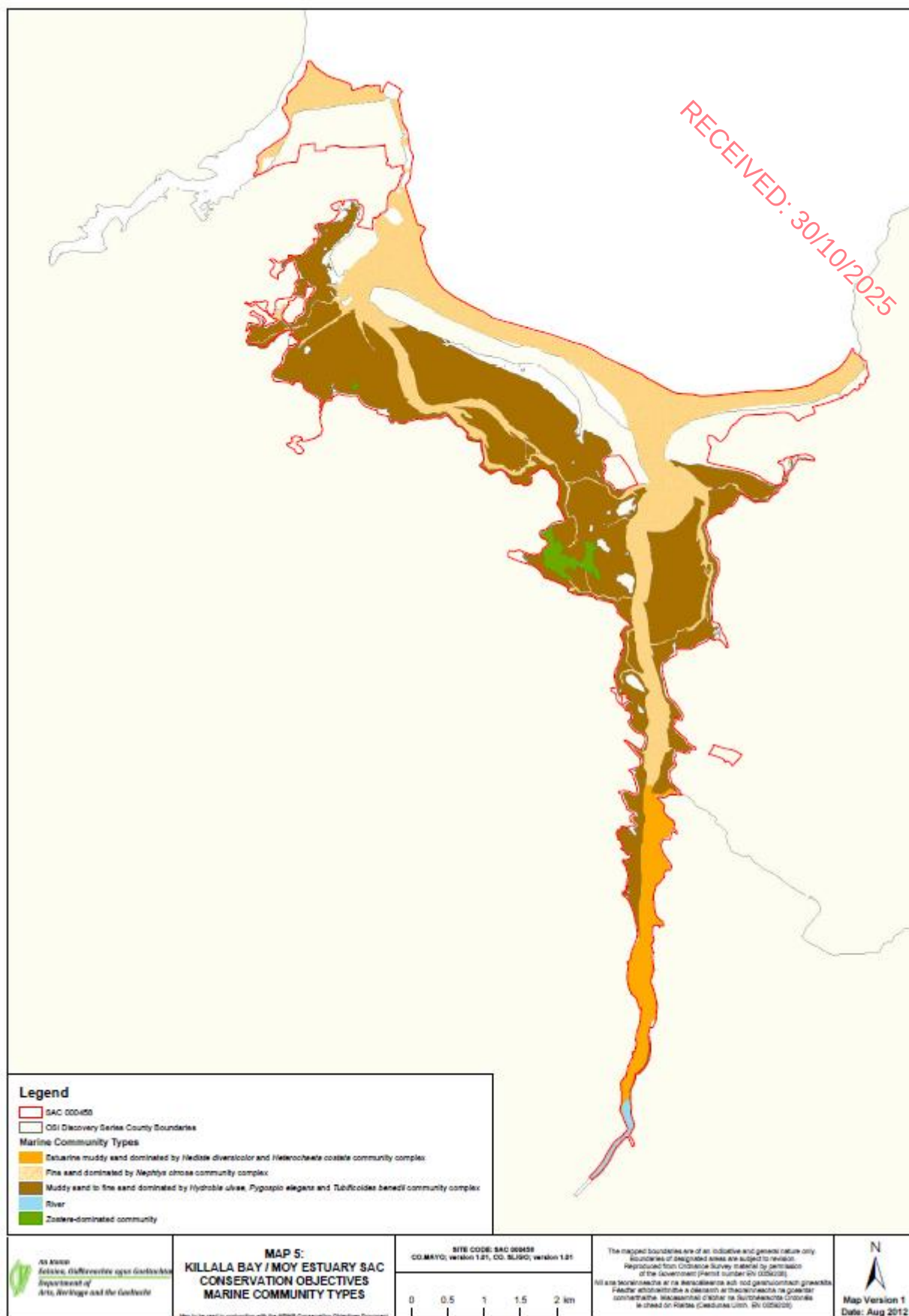
Killala Bay/Moy Estuary SAC 000458 Conservation Objectives Series October 31/10/2012

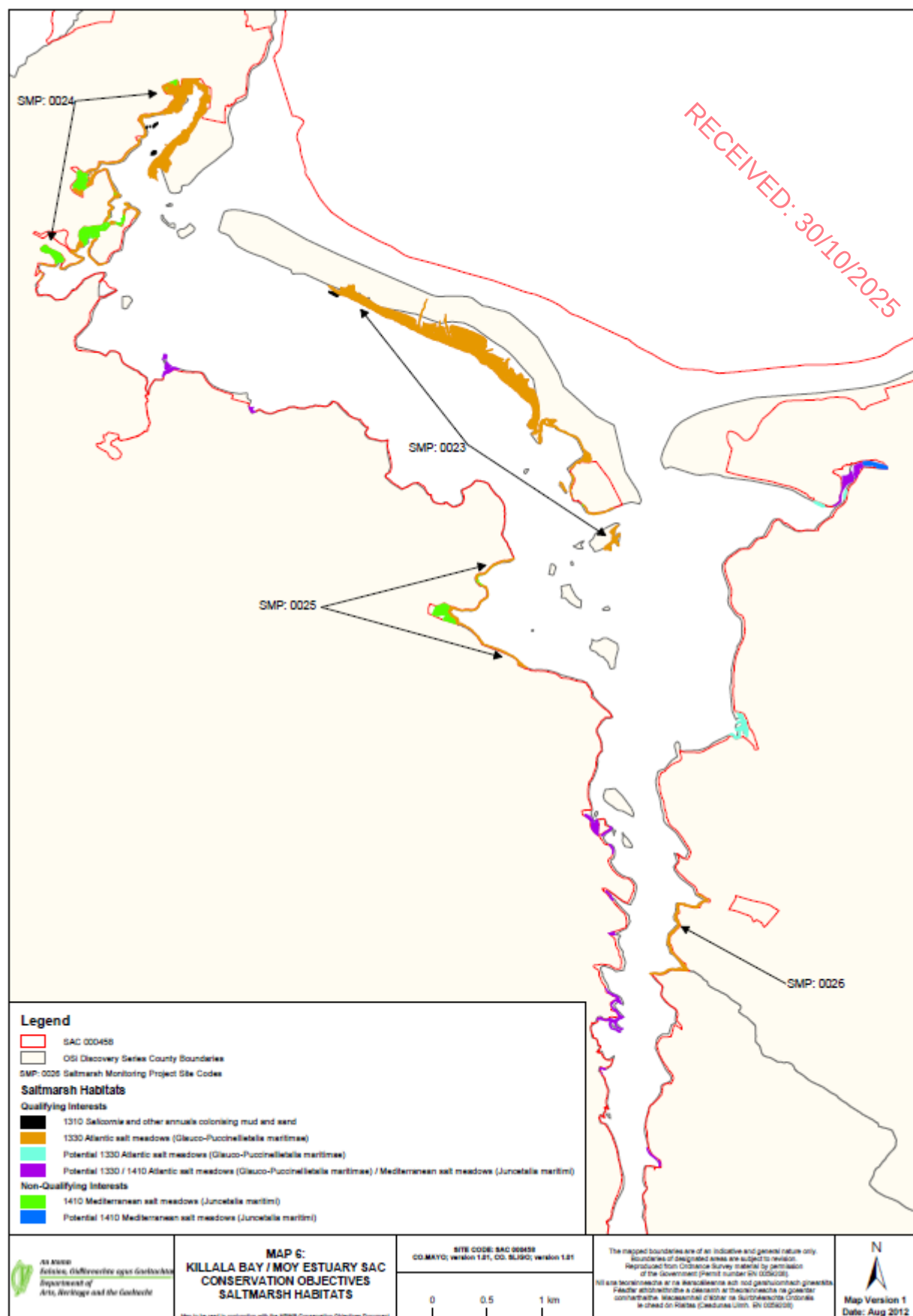
Killala Bay/Moy Estuary SPA Conservation Objectives Series October 28/05/2013

These were the most up to date objectives available at the time of writing

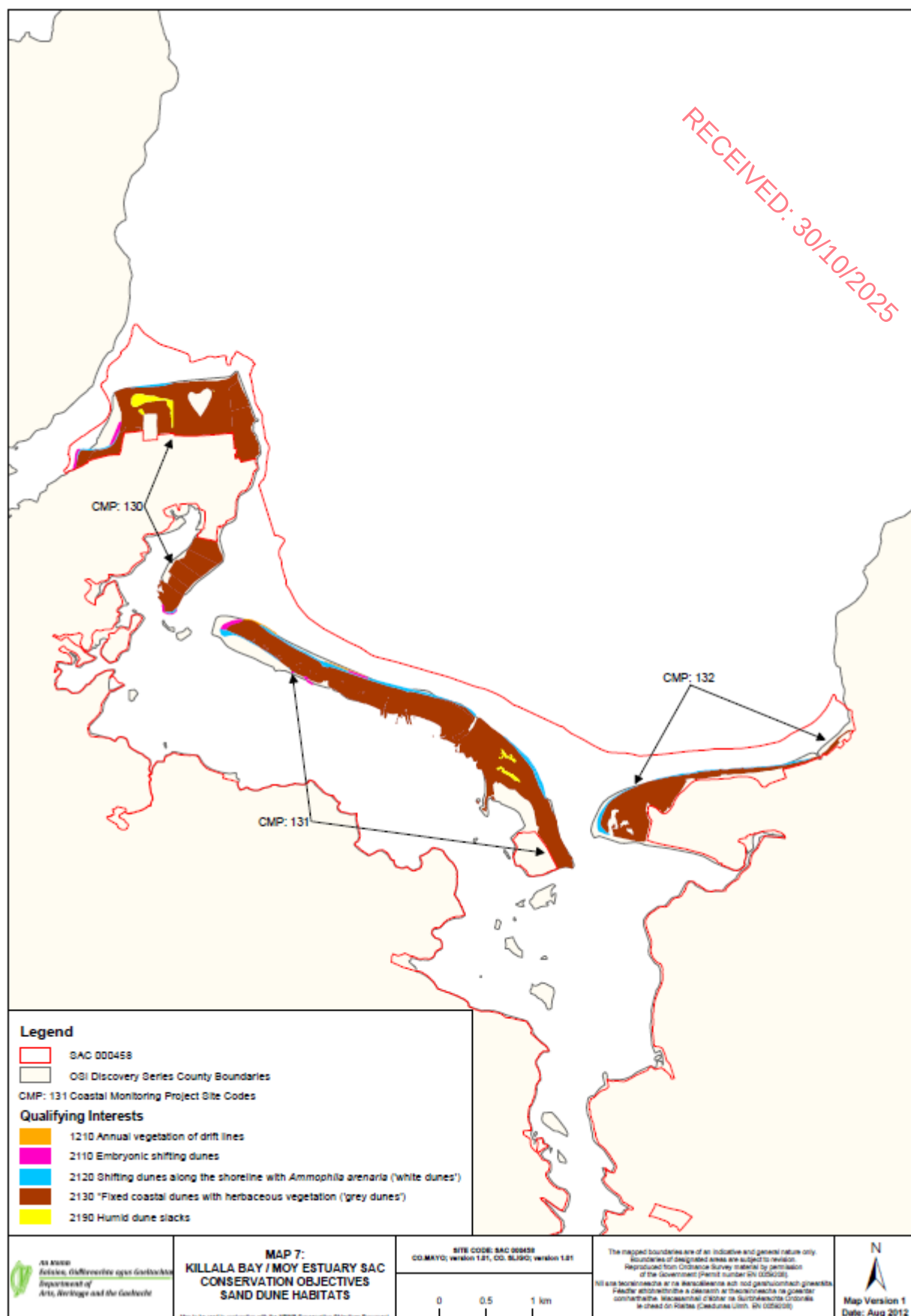
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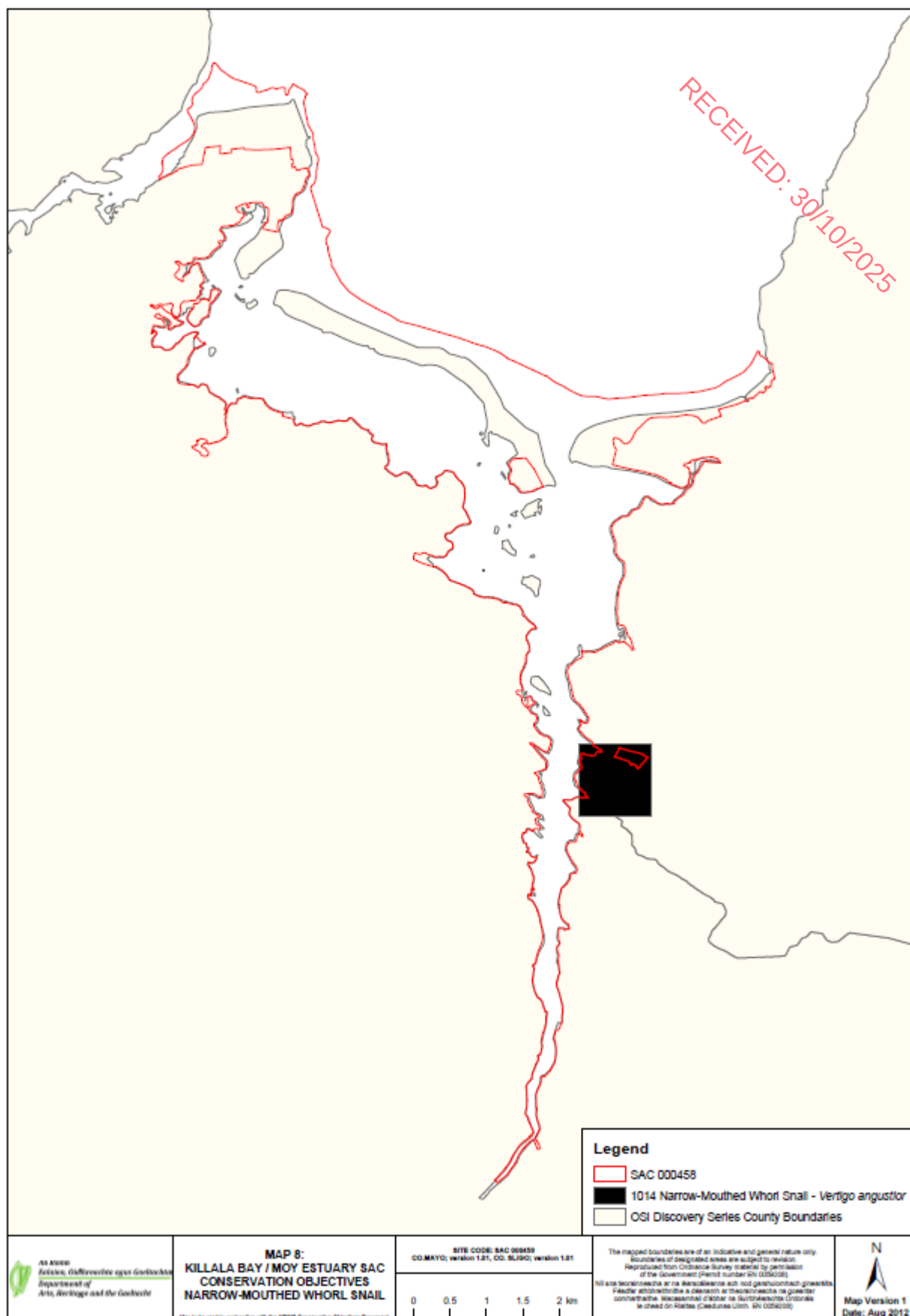






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