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Proposed Housing Development,
Cairns Road,
Sligo,
Co. Sligo

Appropriate Assessment Screening Report
&
Natura Impact Statement

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Contents

1. Introduction	1
1.1 Background	1
1.2 Characteristics of Proposed Development	2
1.2.1 Drainage and SuDS Measures	5
1.2.2 Wastewater Treatment.....	5
1.2.3 Outline CEMP	7
1.2.4 Resource & Waste Management Plan.....	7
1.2.5 Landscaping Plan	8
2. Relevant Legislation	11
3. Methods.....	15
3.1 Desk Study	15
3.2 Field Survey.....	15
3.3 Appropriate Assessment Process	16
3.4 Zone of Influence	17
3.5 Characterising Impacts	17
3.6 Likely Significant Effects	18
3.7 Guidance.....	19
4. Description of Baseline Ecology	21
4.1 Desk Study	21
4.2 Field Survey.....	21
4.3 Wintering Bird Surveys	22
5. Stage 1 - Appropriate Assessment Screening.....	23
5.1 Identification of Natura 2000 Sites	23
5.2 Description of Natura 2000 Sites	36
5.3 Conclusions of Screening for Appropriate Assessment	36
6. Stage 2 - Natura Impact Statement.....	38
6.1 Assessment of the effects of the project on the integrity of Natura 2000 Sites	38
6.1.1 Elements of the project or plan (alone or in combination with other projects or plans) that are likely to give rise to significant effects on the environment.....	38
6.1.2 Conservation Objectives of the Natura 2000 sites	39
6.1.3 Site Specific Pressures and Threats	39
6.1.4 How the Project will affect key species and habitats.	39
6.1.5 How is the integrity of the Natura 2000 site likely to be affected by the project	41
6.1.6 Likely Cumulative Impact of the Proposed Works on European Sites, in-combination with other plans and projects	42

RECEIVED: 21/01/2025

6.1.7	Mitigation Measures	43
7.	Concluding Statement.....	47
8.	References.....	48

RECEIVED: 21/01/2026

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1. Introduction

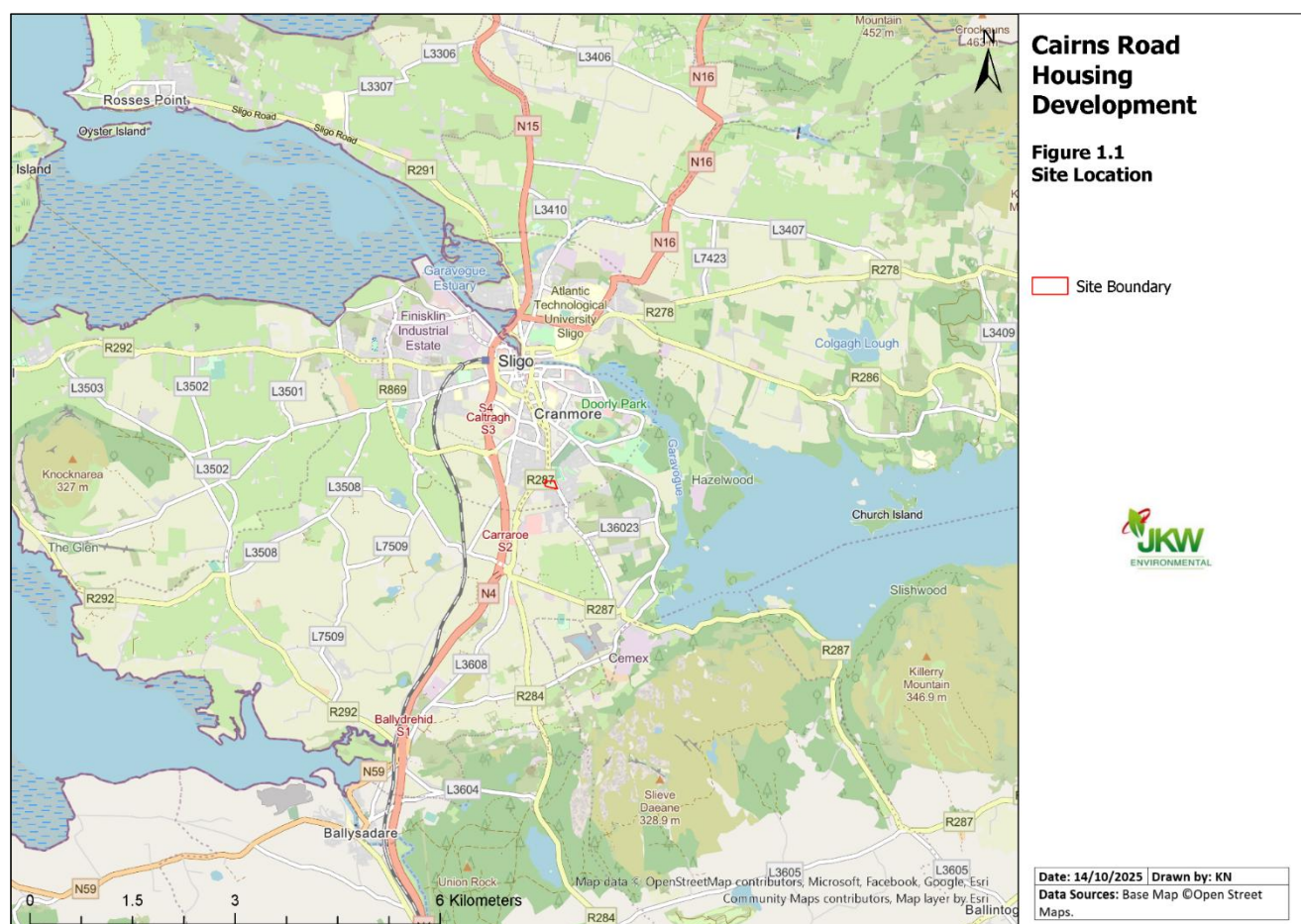
1.1 Background

This document has been prepared by JKW Environmental Ltd to allow the relevant competent authority to conduct an Appropriate Assessment in accordance with the requirements of Article 6(3) of the Habitats Directive (Directive 92/43/EEC).

Screening for Appropriate Assessment is required under Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). Where it cannot be excluded that a project or plan, either alone or in combination with other projects or plans, would have a significant effect on a European Site then same shall be subject to an appropriate assessment of its implications for the site in view of the site's conservation objectives.

The current project is not directly connected with, or necessary for, the management of any European Site consequently the project has been subject to the Appropriate Assessment Screening process.

The proposed works site location (hereinafter referred to as “the Site”) is shown in Figures 1.1 & 1.2.





1.2 Characteristics of Proposed Development

The proposed development comprises a residential scheme by Eminence Homes Ltd. on a site of approximately 1.54 hectares at Cairns Road, Co. Sligo, as described in the Architectural Design Statement and illustrated on the Proposed Site Layout Plan prepared by Rhatigan & Company Architects Ltd.

The site is located within an established residential area and is bounded primarily by existing housing, with access taken from Cairns Road. The development has been designed to integrate with the surrounding urban context and to make efficient use of serviced zoned land.

The proposal consists of a residential development comprising a mix of house and apartment types. The scheme provides a range of dwelling sizes and typologies intended to meet local housing needs and to reflect the character of the surrounding residential area. The development comprises the following units:

- 8 no. one-bedroom own-door apartments, arranged in three blocks
- 9 no. two-bedroom houses
- 26 no. three-bedroom houses
- 8 no. four-bedroom houses

The houses are provided in a mix of terraced and semi-detached formats, with private rear gardens associated with each unit, while the apartments are provided as own-door units with shared external

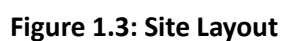
amenity. This mix is set out in the Architectural Design Statement and illustrated on the Proposed Site Layout Plan.

The site layout includes internal estate roads, footpaths and pedestrian connections, car parking spaces, landscaped areas and a centrally located area of public open space. The public open space extends to approximately 2,133 m², representing circa 15% of the net site area, and is designed to provide accessible amenity space for future residents. Landscaping and planting are proposed throughout the site, including within the public open space and along site boundaries, to enhance visual amenity and integration with the surrounding residential environment.

Access to the development is provided via a single vehicular entrance from Cairns Road, with an internal road network designed to accommodate vehicular, pedestrian and cyclist movements safely. A pedestrian and cyclist link is also provided to connect the site with the surrounding residential area. Car parking spaces are distributed throughout the development in accordance with applicable standards, as shown on the Proposed Site Layout Plan.

The proposed development includes all associated infrastructure and services, including foul drainage connections to the existing public foul sewer network, on-site management of surface water through Sustainable Drainage Systems, potable water supply connections, public lighting, and all ancillary site development works. Construction of the development is anticipated to take place over a period exceeding 12 months.

The proposed layout is shown below in Figure 1.3.



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1.2.1 Drainage and SuDS Measures

The Civil Design Report prepared by MFA Consulting Engineers Ltd. (December 2025) for the Proposed Residential Development at Cairns Road, Co. Sligo sets out the proposed drainage strategy and the Sustainable Drainage Systems (SuDS) measures to be implemented as part of the development.

The report confirms that surface water drainage for the development will be managed entirely on site using a SuDS-based approach, with full separation between foul and surface water systems and no direct discharge to surface waters or the public stormwater network. The surface water strategy is designed in accordance with the CIRIA SuDS Manual (C753), Sewers for Adoption (8th Edition), and national guidance for housing developments, with the objective of mimicking natural drainage processes and controlling runoff at source.

Specific SuDS measures identified in the report include the use of infiltration-based drainage as the primary means of surface water management. Surface water runoff from roofs, roads and other impermeable areas will be collected via road gullies and a dedicated stormwater pipe network and directed to two purpose-designed soakaways located within the central green area of the site. These soakaways provide on-site storage and gradual infiltration of runoff to ground, thereby attenuating flows and preventing rapid discharge beyond the site boundary. The proposed soakaways are of defined size and depth, with soakaway areas of approximately 263 m² and 225 m² respectively and a design depth of 1.5 m, and are set at appropriate invert levels to facilitate infiltration. Infiltration testing was undertaken at the proposed soakaway locations, with recorded infiltration rates confirming that ground conditions are suitable to support this approach, and soakaway dimensions and storage volumes have been designed accordingly.

The drainage design also incorporates measures to improve water quality as part of the SuDS treatment train. Catchpit manholes are provided within the stormwater network to allow settlement of sediments prior to infiltration, reducing the potential for fine particulates to enter the ground. Proprietary by-pass petrol separators are included on sections of the network draining roads and parking areas to capture hydrocarbons and other pollutants associated with vehicular use before surface water reaches the soakaways, providing an additional level of treatment prior to infiltration.

The stormwater network has been designed to accommodate extreme rainfall events up to the 1-in-100-year return period with an allowance for climate change, using Met Éireann rainfall data for the Sligo area. Runoff calculations were undertaken using the Modified Rational Method, and minimum self-cleansing velocities are achieved within the pipe network to limit sediment build-up and maintain long-term operational performance of the SuDS features.

Overall, the Civil Design Report provides specific detail on the SuDS measures to be implemented, including infiltration-based soakaways of defined size and capacity, sediment control via catchpits, and hydrocarbon interception via by-pass separators, demonstrating that surface water runoff will be managed in a controlled and sustainable manner within the site boundary.

1.2.2 Wastewater Treatment

Wastewater treatment for the proposed development is addressed within the Civil Design Report and the Outline Construction Environmental Management Plan prepared by MFA Consulting Engineers Ltd. The proposed development will be served by a foul drainage system that is fully separate from the surface water drainage network.

A pre-connection feasibility assessment has been undertaken by Uisce Éireann, (CDS24002301, dated 10 October 2024) to confirm the availability and suitability of the existing public foul sewer and downstream wastewater treatment infrastructure to accommodate the proposed development. This assessment confirms that foul wastewater from the development can be accommodated within the public network, subject to standard connection requirements.

During the construction phase, temporary wastewater generated on site will be managed in accordance with the Outline CEMP, with appropriate controls in place to prevent pollution, including the correct management of foul drainage connections, temporary facilities and accidental spill response measures.



1.2.3 Outline CEMP

An Outline Construction Environmental Management Plan (OCEMP) has been prepared by MFA Consulting Engineers Ltd. (December 2025) for the Proposed Residential Development at Cairns Road, Co. Sligo. The OCEMP has been prepared to inform the construction phase of the development and to set out the environmental management framework and control measures that will be implemented during site clearance, construction and associated works .

The OCEMP is an outline document and will be further developed by the appointed contractor prior to commencement of construction. Its primary objective is to ensure compliance with all relevant environmental legislation, planning conditions and best practice guidance, and to minimise the risk of pollution, waste generation and environmental disturbance during construction. The contractor will be required to prepare a detailed CEMP, informed by the Outline CEMP and by the Ecological Impact Assessment, Natura Impact Statement and planning consent, prior to works commencing on site.

The Outline CEMP sets out defined roles and responsibilities for environmental management during construction, including the appointment of a Site Manager and a suitably qualified Site Environmental Manager, who will be responsible for implementation, monitoring and reporting on environmental measures. Environmental awareness and training, including site inductions and toolbox talks, will be provided to all site personnel to ensure that environmental responsibilities and site-specific sensitivities are understood.

A range of environmental management measures are outlined within the OCEMP, including controls relating to the construction compound, dust, noise and vibration, construction traffic, waste management and water and wastewater protection. Measures to protect water quality during construction include sediment control measures, management of surface water runoff, appropriate storage and handling of fuels and chemicals, spill prevention and response procedures, and controls relating to concrete works and wheel washing. The OCEMP confirms that there are no surface watercourses within the immediate vicinity of the site and that surface water generated during construction will be managed through the site drainage network discharging to on-site soakaways.

The OCEMP also sets out procedures for emergency response, incident reporting, monitoring and auditing, including regular site inspections, environmental performance reporting and procedures to address non-compliance. These measures are intended to ensure that any potential environmental risks associated with the construction phase are identified, managed and addressed in a timely manner.

Overall, the Outline CEMP provides a clear framework for the management of environmental risks during construction and confirms that a detailed, contractor-led CEMP will be implemented to ensure that construction activities do not give rise to significant adverse environmental effects, either alone or in combination with other plans or projects.

1.2.4 Resource & Waste Management Plan

A Resource and Waste Management Plan (RWMP) has been prepared by MFA Consulting Engineers Ltd. for the Proposed Residential Development at Cairns Road, Co. Sligo, on behalf of Eminence Homes Limited. The RWMP sets out the procedures for the management of construction and demolition waste during the construction phase, with the aim of preventing pollution, minimising waste generation and ensuring compliance with relevant waste legislation and best practice.

The RWMP confirms that waste generation will be managed in accordance with the waste hierarchy, prioritising prevention, reduction, reuse and recycling, with disposal as a last resort. Earthworks are expected to generate significant volumes of soil and stone; however, where suitable, excavated material will be reused on site for backfilling and landscaping, thereby reducing the need for off-site disposal and associated environmental risks. Any material unsuitable for reuse will be removed by authorised waste contractors to appropriately permitted facilities.

The plan includes specific measures for the segregation and management of non-hazardous and hazardous waste streams, including concrete, masonry, timber, metals, packaging materials and limited volumes of hazardous wastes such as oils, fuels and batteries. Hazardous materials will be stored in designated, clearly labelled containers and managed in accordance with EPA guidance, with all movements tracked and documented to ensure appropriate handling and disposal. Spill prevention, controlled storage and regular inspections are integral components of the RWMP, reducing the risk of accidental releases to soil or groundwater.

Roles and responsibilities for waste management are clearly defined within the RWMP, including the appointment of a suitably qualified Resource Manager by the Contractor. Training, auditing, monitoring and record-keeping procedures are specified to ensure effective implementation throughout the construction period. The RWMP is a live document and will be updated as required to reflect site conditions and construction activities.

1.2.5 Landscaping Plan

The proposed landscape plan for the development has been prepared by Rhatigan & Company Architects Ltd. and is set out in the Landscape Design Report (December 2025). The landscape strategy has been designed to integrate the development sensitively into its local setting, while enhancing ecological value, biodiversity and residential amenity, and complying with the public open space requirements of the Sligo County Development Plan.

The total site area measures approximately 1.54 hectares, of which approximately 15% (c. 2,133m²) is allocated to public open space in the form of a centrally located neighbourhood green (Central Park). This space is designed as an enclosed and overlooked urban green, providing both active and passive recreational opportunities. Central Park incorporates a junior play area with natural play equipment, seating areas, and an informal grassed kickabout area, providing recreational amenity for residents while maintaining a continuous green corridor through the site.

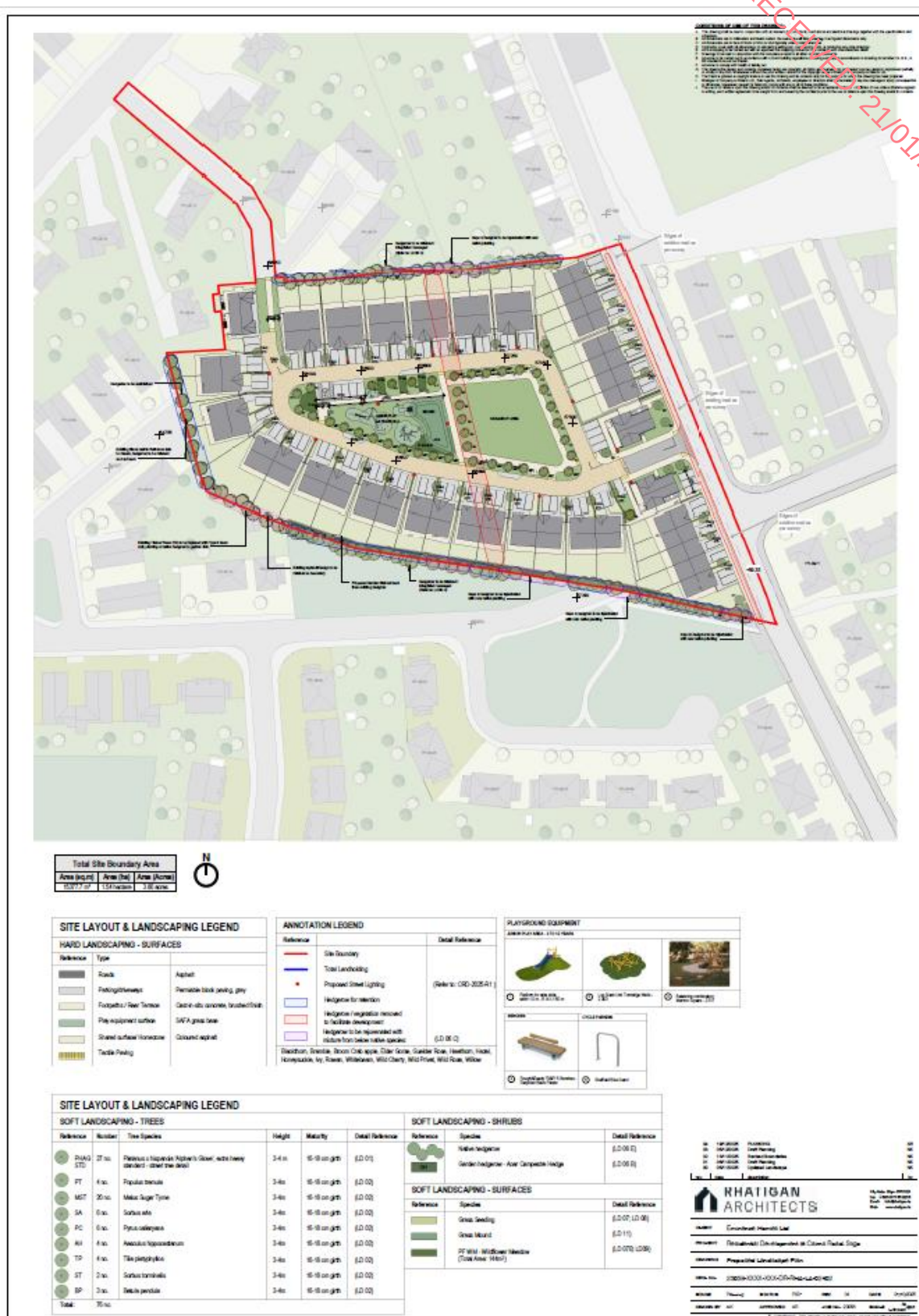
Existing hedgerows along the northern, western and southern site boundaries, totalling approximately 359 metres in length, will be retained and enhanced as part of the development. These boundary hedgerows will be protected during construction and strengthened through gap planting and supplementary native species to improve their structure, ecological function and connectivity. A short section of hedgerow along the northern boundary and sections along the Cairns Road frontage, totalling approximately 203 metres, will be removed to facilitate site access and connectivity, with compensatory native hedgerow planting provided elsewhere within the site. New native hedgerows are proposed within the development to reinforce boundaries, define spaces and enhance biodiversity.

Soft landscaping throughout the site comprises a diverse mix of native and ornamental planting, with a strong emphasis on pollinator-friendly species and structural diversity. A native wildflower meadow is incorporated within the central open space as part of the biodiversity strategy, covering approximately 144 m², and is designed to support pollinating insects and other invertebrates.

Additional biodiversity-focused planting areas are provided within Central Park and along retained hedgerows.

Tree planting forms a key element of the landscape strategy, with approximately 76 new trees proposed across the site. Trees will be planted within the public open space, along streets, within front gardens and adjacent to parking areas. Species include *Platanus × hispanica* 'Alphen's Globe' used as a consistent street tree, alongside native and ornamental species such as *Tilia platyphyllos*, *Malus* 'Sugar Tyme', *Pyrus calleryana*, *Aesculus hippocastanum*, *Sorbus aria*, *Sorbus torminalis*, *Betula pendula* and *Populus tremula*. The diversity of tree species has been selected to improve resilience to pests and disease, enhance seasonal interest, and maximise biodiversity value. Tree spacing and layout have been designed to frame the public open space while maintaining clear sightlines and passive surveillance.

Hard landscaping materials have been selected to create a high-quality and robust residential environment and include shared surface treatments within the central area to calm traffic and prioritise pedestrian movement. Footpaths, seating, cycle parking and play equipment are integrated into the landscape design to promote community use of outdoor spaces. Permeable and durable surface treatments are incorporated where appropriate, supporting sustainable drainage principles and long-term ease of maintenance.



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2. Relevant Legislation

European Nature Directives (Habitats and Birds)

The Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) forms the basis for the designation of Special Areas of Conservation. Similarly, Special Protection Areas are classified under the Birds Directive (Council Directive 2009/147/EEC on the Conservation of Wild Birds). Collectively, Special Areas of Conservation (SAC) and Special Protection Areas (SPA) are referred to as the Natura 2000 network. In general terms, they are considered to be of exceptional importance for rare, endangered or vulnerable habitats and species within the European Community.

Under Article 6(3) of the Habitats Directive an appropriate assessment must be undertaken for any plan or project that is likely to have a significant effect on the conservation objectives of a Natura 2000 site. An appropriate assessment is an evaluation of the potential impacts of a plan or project on the conservation objectives of a Natura 2000 site¹, and the development, where necessary, of mitigation or avoidance measures to preclude negative effects.

Article 6, paragraph 3 of the EC Habitats Directive 92/43/EEC ("the Habitats Directive") states that: *"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"*

The Habitats Directive is transposed into Irish law by the EC (Birds and Natural Habitats) Regulations 2011 – 2015. Part XAB of the Planning and Development Acts 2000 to 2020 transposes Article 6(3) and 6(4) of the Habitats Directive in respect of land use plans and proposed projects requiring development consent.

EC (Birds and Natural Habitats) Regulations 2011 to 2021 – Part 5

Part 5 of the EC (Birds and Natural Habitats) Regulations 2011 – 2021 sets out the circumstances under which an 'appropriate assessment' is required. Section 42(1) requires that *'a screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to undertake or adopt, and which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site.'* Section 42(2) expands on this, stipulating that a public authority must carry out a screening for Appropriate Assessment before consent for a plan or project is given, or a decision to undertake or adopt a plan or project is taken. To assist a public authority to discharge its duty in this respect, Section 42(3)(a) gives them the authority to direct a third party to provide a Natura Impact Statement and Section 42(3)(b) allows them to request any additional information that is considered necessary for the purposes of undertaking a screening assessment.

¹ Also referred to as European Sites in the Planning and Development Acts 2000 – 2021.

Section 42(6) requires that ‘the public authority shall determine that an Appropriate Assessment of a plan or project is required where the plan or project is not directly connected with or necessary to the management of the site as a European Site and if it cannot be excluded, on the basis of objective scientific information following screening under this Regulation, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site’

Planning and Development Acts 2000 to 2021 - PART XAB

The relevant sections of Part XAB of the Planning and Development Acts 2000 – 2021 are set out below.

Screening for appropriate assessment

Section 177U requires that— (1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed project shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed project, individually or in combination with another plan or project is likely to have a significant effect on the European site.

(2) A competent authority shall carry out a screening for appropriate assessment under subsection (1) before—

(a) a Land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made, or

(b) consent for a proposed project is given.

(3) In carrying out screening for appropriate assessment of a proposed project a competent authority may request such information from the applicant as it may consider necessary to enable it to carry out that screening, and may consult with such persons as it considers appropriate and where the applicant does not provide the information within the period specified, or any further period as may be specified by the authority, the application for consent for the proposed project shall be deemed to be withdrawn.

(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed project, as the case may be, is required if it cannot be excluded, on the basis of objective information, that the draft Land use plan or proposed project, individually or in combination with other plans or projects, will have a significant effect on a European site.

(5) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed project, as the case may be, is not required if it can be excluded, on the basis of objective information, that the draft Land use plan or proposed project, individually or in combination with other plans or projects, will have a significant effect on a European site.

(6) (a) Where, in relation to a proposed project, a competent authority makes a determination that an appropriate assessment is required, the competent authority shall give notice of the determination, including reasons for the determination of the competent authority, to the following—

(i) the applicant,

(ii) if appropriate, any person who made submissions or observations in relation to the application to the competent authority, or

(iii) if appropriate, any party to an appeal or referral.

(b) Where a competent authority has determined that an appropriate assessment is required in respect of a proposed project it may direct in the notice issued under paragraph (a) that a Natura impact statement is required.

(c) Paragraph (a) shall not apply in a case where the application for consent for the proposed project was accompanied by a Natura impact statement.

(7) A competent authority shall, as soon as may be after making the Land use plan or making a decision in relation to the application for consent for proposed project, make available for inspection by members of the public during office hours at the offices of the authority, and may also publish on the internet —

(a) any determination that it makes in relation to a draft Land use plan under subsection (4) or (5) as the case may be, and reasons for that determination, and

(b) any notice that it issues under subsection (6) in relation to a proposed project.

(8) In this section ‘consent for proposed project’ means, as appropriate —

(a) a grant of permission,

(b) a decision of the Board to grant permission on a planning application or an appeal,

(c) consent for development under Part IX,

(d) approval for development that may be carried out by a local authority under Part X or Part XAB or development that may be carried out under Part XI,

(e) approval for development on the foreshore under Part XV,

(f) approval for development under section 43 of the Act of 2001,

(g) approval for development under section 51 of the Roads Act 1993, or

(h) a substitute consent under Part XA.

(9) In deciding upon a declaration or a referral under section 5 of this Act a planning authority or the Board, as the case may be, shall where appropriate, conduct a screening for appropriate assessment in accordance with the provisions of this section.

(10) In deciding upon an application under section 176A or a determination review or an application referral under section 176C, a planning authority or the Board, as the case may be, shall, where appropriate, conduct a screening for appropriate assessment in accordance with the provisions of this section.

Natura impact report and natura impact statement

Section 177T states that— (1) (a) A Natura impact report means a statement for the purposes of Article 6 of the Habitats Directive, of the implications of a Land use plan, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites.

(b) A Natura impact statement means a statement, for the purposes of Article 6 of the Habitats Directive, of the implications of a proposed development, on its own or in combination with other

plans or projects, for one or more than on European site, in view of the conservation objectives of the site or sites.

(2) Without prejudice to the generality of subsection (1), a Natura impact report or a Natura impact statement, as the case may be, shall include a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications for one or more than one European site in view of the conservation objectives of the site or sites.

(3) As respects a draft National Planning Framework, the Government shall prepare a Natura impact report in relation to a draft Land use plan and the following bodies shall also prepare a Natura impact report in relation to a draft Land use plan—

(a) as respects a draft regional spatial and economic strategy, the regional assembly for whose area the draft strategy is made,

(aa) as respects a draft National Planning Framework, the Minister

(b) as respects a draft planning scheme in respect of all or any part of a strategic development zone, the planning authority (which term shall be construed in accordance with section 168(5)) for whose area the draft scheme is made,

(c) as respects a draft development plan or draft variation of a development plan, the planning authority for whose area the draft plan or draft variation is made, and

(d) as respects a draft local area plan, the planning authority in whose area the local area concerned is situate.

(4) The applicant for consent for proposed development may, or if directed in accordance with subsection (5) by a competent authority, shall furnish a Natura impact statement to the competent authority in relation to the proposed development.

(5) At any time following an application for consent for proposed development a competent authority may give a notice in writing to the applicant concerned, directing him or her to furnish a Natura impact statement

(6) Where an applicant for consent for proposed development who, having been directed in accordance with subsection (5), fails to furnish a Natura impact statement within the period specified in the notice, or any further period as may be specified by the competent authority, the application for consent for the proposed development shall be deemed to be withdrawn.

(7) (a) Without prejudice to subsection (1) a Natura impact report or a Natura impact statement shall include all information prescribed by regulations under section 177AD.

(b) Where appropriate, a Natura impact report or a Natura impact statement shall include such other information or data as the competent authority considers necessary to enable it to ascertain if the draft Land use plan or proposed development will not affect the integrity of the site.

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3. Methods

3.1 Desk Study

A desk study was carried out to collate information available on Natura 2000 sites within the potential zone of influence of the proposed development. The Site and the surrounding area were viewed using satellite imagery². Sligo County Council planning portal³ was accessed for information on other permitted and proposed development within the zone of influence of the project. The National Parks and Wildlife Service (NPWS) website⁴ was accessed for information on Natura 2000 sites. Environmental Protection Agency (EPA) Maps⁵ was accessed for other environmental information relevant to preparation of this report.

The following documents were referenced during the desk-top study to inform the Appropriate Assessment and the baseline ecology information:

- Online data available on European sites and habitats/species as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie, including conservation objectives documents
- Online data available on protected species as held by the National Biodiversity Data Centre (NBDC) from www.biodiversityireland.ie, specifically related to the records recorded within the 2 km grid square (ITM) – G63X.
- Birds of Conservation Concern in Ireland (Gilbert et al, 2021), available at <https://birdwatchireland.ie/birds-of-conservation-concern-in-ireland/>
- Information on the surface water network and surface water quality in the area available from www.epa.ie
- Information on soils, geology and hydrogeology in the area available from the Geological Survey Ireland (GSI) online Spatial Resources service. Available from <https://www.gsi.ie/en-ie/data-and-maps/Pages/Groundwater.aspx>
- Ordnance Survey of Ireland mapping and aerial photography available from <https://tailte.ie/>
- GeoHive online mapping (<https://geohive.ie/index.html>)
- Sligo County Development Plan 2024-2030
- 'Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors' (CIRIA, 2001)

3.2 Field Survey

A multidisciplinary ecological walkover survey of the site was conducted on the on the 30th of September 2025 in line with NRA (2009) guidelines (Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes) and the methodology described in Best Practice Guidance for Habitat Survey and Mapping⁶. Habitats within the site boundary were classified using 'A Guide to Habitats in Ireland' (Fossitt, 2000)⁷. The dominant plant species present in each habitat were recorded during the field surveys and this is considered sufficient to allow accurate classification of the habitats present.

² www.google.ie/maps

³ <https://www.sligococo.ie/planning/SearchPlanningApplications/OnlinePlanningTools/>

⁴ <https://www.npws.ie/protected-sites>

⁵ <https://gis.epa.ie/>

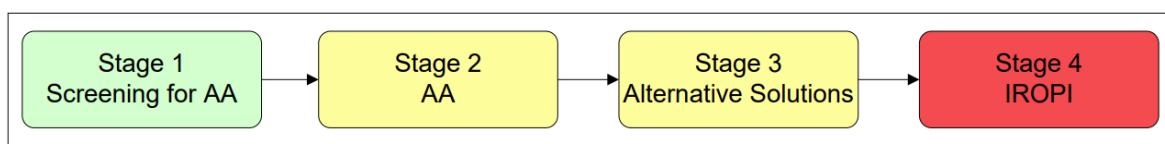
⁶ Smith, G.F., O'Donoghue, P., O'Hara, K. & Delaney, E. (2011) Best Practice Guidance for Habitat Survey and Mapping. The Heritage Council Church Lane, Kilkenny, Ireland.

⁷ Fossitt, J.A. (2000) A Guide to Habitats in Ireland. Heritage Council, Kilkenny

Incidental sightings or evidence of birds, mammals or amphibians were also noted during the Site survey. The habitats within the study area were evaluated for their potential to support protected species. The study area was searched for use of the area by mammals, features such as scat / latrines, feeding remains and hair, were noted where they occur within the study area. The field survey was carried out during suitable weather conditions and the Site was easily accessible.

3.3 Appropriate Assessment Process

The Department of the Environment Heritage and Local Government Guidelines (DELHG, 2009), outlines the European Commission's methodological guidance (EC, 2002). This guidance promotes a four-stage process in completing an AA. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. Throughout the process, the precautionary principle must be applied, so that any uncertainties do not result in adverse impacts on a site. These guidance documents identify a staged approach to conducting an AA, as shown below.



Stage 1: Screening – Initial screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3):

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

For those sites where potential adverse impacts are identified, either alone or in combination with other plans or projects, further assessment is necessary to determine if the proposals will have an adverse impact on the integrity of a European designated site, in view of the site's conservation objectives (i.e. the process proceeds to Stage 2).

Stage 2: Appropriate Assessment - This stage requires a more in-depth evaluation of the plan or project, and the potential direct and indirect impacts of them on the integrity and interest features of the European designated site(s), alone and in-combination with other plans and projects, taking into account the site's structure, function and conservation objectives. Where required, mitigation or avoidance measures will be suggested.

The competent authority can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site(s) concerned. If this cannot be determined, and where mitigation cannot be achieved, then alternative solutions will need to be considered (i.e. the process proceeds to Stage 3).

Stage 3: Alternative Solutions - Where adverse impacts on the integrity of Natura 2000 sites are identified, and mitigation cannot be satisfactorily implemented, alternative ways of achieving the objectives of the plan or project that avoid adverse impacts need to be considered. If none can be found, the process proceeds to Stage 4.

Stage 4: Imperative Reasons of Overriding Public Interest (IROPI)/Derogation - This stage is required where an alternative solution is not available. In this situation, the project can only proceed for Imperative Reasons of Overriding Public Interest (IROPI), despite the plan or project resulting in adverse effects on European Site(s). This stage provides for an assessment of compensation measures

to maintain or enhance the overall coherence of the Natura 2000 network. The Commission must be informed of the compensatory measures. Compensatory measures must be practical, implementable, likely to succeed, proportionate and enforceable, and they must be approved by the Minister.

3.4 Zone of Influence

The 'zone of influence' for a project is the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries. The zone of influence will vary for different ecological features depending on their sensitivity to an environmental change (CIEEM, 2018).

Sites are screened out based on one or a combination of the following criteria:

- The existence of potential for pathways for significant effects, such as hydrological links, proposed project proposals and the site to be screened;
- The distance of the relevant site from the proposed project boundary; and
- The existence of a link between identified threats or vulnerabilities at a site to potential impacts that may arise from the proposed project.

Irish guidance (DoEHLG, 2010)⁸ states, for the zone of influence of plans, that "A distance of 15 km is currently recommended in the case of plans, as a potential zone of influence, and this distance is derived from UK guidance (Scott Wilson et al, 2006)". The guidance goes on to state that "for projects, the distance could be much less than 15 km, and in some cases less than 100 m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, the sensitivities of the ecological receptors, and the potential for in-combination effects."

Guidance from the Office of the Planning Regulator (OPR)⁹ states that "The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km)".

The zone of influence for this project was identified through a review of the nature of the project, the type of impacts and effects that could arise as a result, the distance between the project and European sites, and the qualifying interests of the European sites.

3.5 Characterising Impacts

The methodology for the assessment of impacts is derived from the Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites (EC, 2002). When describing changes/activities and impacts on ecosystem structure and function, the types of impacts that are commonly presented include the following:

- direct and indirect effects,
- short- and long-term effects,

⁸ Appropriate Assessment of Plans and Projects in Ireland -Guidance for Planning Authorities

⁹<https://www.opr.ie/wp-content/uploads/2021/03/9729-Office-of-the-Planning-Regulator-Appropriate-Assessment-Screening-booklet-15.pdf>

- construction, operational and deconstruction / demolition effects, and
- isolated, interactive and cumulative effects.

Impacts that could potentially occur through the implementation of the project can be categorised under a number of impact categories as outlined in the EC 2002 document as follows:

- Loss/Reduction of habitat area,
- Disturbance to key species,
- Habitat or species fragmentation,
- Reduction in species density, and
- Changes in key indicators of conservation value such as decrease in water quality and quantity.

The concept of the 'integrity of the site' is explained in the EU publication Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, as follows;

'It is clear from the context and from the purpose of the directive that the 'integrity of the site' relates to the site's conservation objectives. For example, it is possible that a plan or project will adversely affect the integrity of a site only in a visual sense or only habitat types or species other than those listed in Annex I or Annex II. In such cases, the effects do not amount to an adverse effect for purposes of Article 6(3), provided that the coherence of the network is not affected. On the other hand, the expression 'integrity of the site' shows that focus is here on the specific site. Thus, it is not allowed to destroy a site or part of it on the basis that the conservation status of the habitat types and species it hosts will anyway remain favourable within the European territory of the Member State.'

As regards the connotation or meaning of 'integrity', this can be considered as a quality or condition of being whole or complete. In a dynamic ecological context, it can also be considered as having the sense of resilience and ability to evolve in ways that are favourable to conservation. The 'integrity of the site' has been usefully defined as 'the 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'

A site can be described as having a high degree of integrity where the inherent potential for meeting site conservation objectives is realised, the capacity for self-repair and self-renewal under dynamic conditions is maintained, and a minimum of external management support is required. When looking at the 'integrity of the site', it is therefore important to take into account a range of factors, including the possibility of effects manifesting themselves in the short, medium and long-term.

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

3.6 Likely Significant Effects

The threshold for a likely significant effect is treated in the screening exercise as being above a *de minimis* level¹⁰. The opinion of the Advocate General in CJEU case C-258/11 outlines:

¹⁰ Sweetman v. An Bord Pleanála (Court of Justice of the EU, case C-285/11). A *de minimis* effect is a level of risk that is too small to be concerned with when considering ecological requirements of an Annex I habitat or a population of Annex II species present on a European site necessary to ensure their favourable conservation condition. If low level effects on habitats or

“the requirement that the effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on a European site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

In this report, therefore, ‘relevant’ European sites are those within the potential zone of influence of the construction and / or operation of the Proposed Development, and to which likely significant effect pathways were identified through the source-pathway-receptor model.

3.7 Guidance

Documents associated with the proposed development and relevant ecology databases were consulted as part of this assessment. Field assessments were also completed at the proposed development site between October 2024 and March 2025 in order to inform the EcIA and Screening Assessment. The following guidelines and legal judgements were used in the completion of this assessment;

- 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)
- Office of the Planning Regulator (OPR) Practice Note PN01, Appropriate Assessment Screening for Development Management (2021).
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (DoEHLG 2009)
- Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes: Practitioner’s Manual (EPA 2013)
- European Court of Justice Ruling 11th April 2013 Case C- 258/11 Peter Sweetman and Others v An Bord Pleanála - Criteria to be applied when assessing the likelihood that N6 Galway City Outer Bypass Road scheme will adversely affect the integrity of Lough Corrib SAC
- 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
- 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
- High Court Ruling 25th February 2016 by Mr. Justice Barton. Neutral Citation [2016] IEHC 134; High Court Record No. 2013 450 JR; Balz & Anor -v- An Bord Pleanála.
- European Court of Justice ruling 12th April 2018 in respect of Case C-323/17 (People Over Wind & Sweetman) - it is not appropriate for the purposes of Appropriate Assessment (AA), at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of a plan or project.
- European Court of Justice ruling 19th April 2018 in respect of Case C-164/17, Compensation vs Mitigation, Grace & Sweetman Vs ABP.
- High Court Ruling 8th February 2019 by Justice Barniville in respect of Kelly -v- An Bord Pleanála & anor. The Court concludes “as a matter of fact and law, that SUDS are not mitigation

individuals of species are judged to be in this order of magnitude and that judgment has been made in the absence of reasonable scientific doubt, then those effects are not considered to be likely significant effects.

measures which a competent authority is precluded from considering at the stage 1 screening stage". The Irish High Court ([2019] IEHC 84)

- Heather Hill Management Company CLG v An Bord Pleanála (Burkeway Homes Limited as Notice Party) [2019] IEHC 450. Mr. Justice Garrett Simons granted an order of certiorari setting aside the decision of the Board to grant permission for a residential development of 197 units at Bearna Co. Galway, on the basis that it was a material contravention of the Galway County Development Plan (the CDP), it failed to carry out a 'justification test' as required and failed to carry out proper Appropriate Assessment screening.
- European Commission. Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, (21-11-18) C (2018) 7261 Final. Commission Notice Brussels

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4. Description of Baseline Ecology

4.1 Desk Study

A desktop study was undertaken in advance of the field study walkovers to identify the ecological habitats present within the proposed walking trail footprint and adjacent areas. The desktop study was undertaken using the sources of information outlined above in section 3.1.

The areas surrounding the Site have been classified as discontinuous urban fabric and agricultural areas – pastures and broad-leaved forests (Corinne, 2018).

A review of species records on the National Biodiversity Data Centre Ireland (NBDC) website shows records indicating the presence of protected species: Common Frog (*Rana temporaria*), Harbour Seal (*Phoca vitulina*), Brown Long-eared Bat (*Plecotus auritus*), Common Pipistrelle (*Pipistrellus pipistrellus*), Daubenton's Bat (*Myotis daubentonii*), Leisler's Bat (*Nyctalus leisleri*), Natterer's Bat (*Myotis nattereri*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Red Squirrel (*Sciurus vulgaris*), Otter (*Lutra lutra*) and Hedgehog (*Erinaceus europaeus*) within the 2km polygon (G63X) surrounding the site.

With respect to regional hydrology, the proposed development is within the Sligo Bay WFD Catchment, the WFD sub-catchment Bonet_SC_030 and the Garavogue_010 WFD River sub basin.

There are no watercourses within the site boundary. The nearest watercourse, Garavogue River (EPA Code: 35G01) is located approximately 1.6 km north of the proposed development. The Garavogue River was classified as having 'Poor' status under the WFD River Waterbody Status 2019-2024. The WFD River Waterbody Risk status is 'At Risk'.

The proposed development site is located within the Carrowmore East groundwater catchment. This groundwater body has been classified as having 'Good' status under the Ground Waterbody WFD Status 2019-2024 and 'At risk' as per the WFD risk score.

The aquifer in the region here is a Regionally Important Aquifer - Karstified (conduit). The proposed site is located within an area classified as having 'High' groundwater vulnerability.

4.2 Field Survey

A site walkover survey was undertaken to characterise the habitats and assess the ecological baseline of the proposed development lands at Cairns Road, Sligo. The site comprises two adjoining agricultural fields bounded and separated by hedgerows. Habitats were classified in accordance with A Guide to Habitats in Ireland (Fossitt, 2000).

The majority of the site is categorised as **GA1 Improved Agricultural Grassland**. The grassland is semi-improved in character and dominated by rye-grasses (*Lolium* spp.) and meadow-grasses (*Poa* spp.), with frequent dandelion (*Taraxacum* spp.), creeping buttercup (*Ranunculus repens*), plantains (*Plantago* spp.), common nettle (*Urtica dioica*), and docks (*Rumex* spp.). These species are typical of intensively managed, moderately fertile grassland maintained under regular grazing or mowing.

The site boundaries are composed of **WL1 Hedgerows**, with one hedgerow also dividing the two internal fields. Hedgerow species include hawthorn (*Crataegus monogyna*), ash (*Fraxinus excelsior*), elder (*Sambucus nigra*), and privet (*Ligustrum vulgare*), with abundant ivy (*Hedera helix*). The hedgerows vary from poor to good ecological quality.

A small area of **WS1 Scrub** occurs in the north-west corner of the site, dominated by bramble (*Rubus fruticosus* agg.). Bramble is also encroaching from the field boundaries into the grassland in several areas.

A derelict shed located in the north-west corner of the site is classified as **BL3 Buildings and Artificial Surfaces**.

Existing access tracks within the site are classified as a mosaic of **ED2 Spoil and bare ground** and **ED3 Recolonising bare ground**. These areas comprise laid gravel with limited vegetation cover, including sections of sparsely vegetated substrate (ED2) alongside patches where early colonising species have established on the disturbed surface (ED3).

No surface water features, such as drains or watercourses, occur within or adjacent to the site.

The non-native species fuchsia (*Fuchsia magellanica*) was recorded within hedgerows on site. While this species is not native to Ireland, it is not listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and is therefore not considered invasive under the legislation. No invasive alien species listed on the Third Schedule were recorded during the survey.

No Annex I habitats were recorded within or adjacent to the Site during the multidisciplinary site walkover.

4.3 Wintering Bird Surveys

Ornithological surveys were undertaken at the proposed site from September to November 2025. General wintering bird transect methods were based on methods described in Bibby et al. (2000) and adapted Brown and Shepherd surveys' (SNH, 2017). The study area for this survey comprised of one 420m transect. On each transect survey the number of each species seen/heard during the transect surveys were recorded in three defined distance bands from the observer (i.e. 0m-25m, 25m-100m, >100m). Care was taken to minimise double-counting individuals in general. During all transect surveys, notes were taken of any observations of particular interest, e.g. raptor foraging, particular species flying over etc. Each transect was walked once during September, October and November 2025.

Bird activity on site was generally low, reflecting the limited habitat diversity and the urban context of the area. Species recorded during the transect included robin (*Erithacus rubecula*), wren (*Troglodytes troglodytes*), rook (*Corvus frugilegus*), and blackbird (*Turdus merula*), all of which are common and widespread resident species in Ireland. In addition, herring gull (*Larus argentatus*) was recorded flying over the site but not utilising the habitats within it.

No bird species associated with any of the nearby Special Protection Areas (SPAs) were recorded using the site or its boundary habitats during the survey.

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5. Stage 1- Appropriate Assessment Screening

This section of the report identifies the potential zone of influence of the proposed development, provides information on the Natura 2000 sites within the identified zone of influence and sets out the potential impacts and effects and the likelihood of significant effects.

5.1 Identification of Natura 2000 Sites

The first step in identification of Natura 2000 sites is to determine the potential zone of influence of the proposed works. When the zone of influence of the proposed works has been determined, Natura 2000 sites within this area can be identified. The potential for these sites to be affected can be evaluated by considering:

- Scale and type of the proposed works.
- Proximity to the proposed works.
- Qualifying interests.
- Ecological¹¹ and Landscape¹² connectivity.

A source-pathway-receptor model has been used to establish which European Sites could occur within the zone of influence of the project. Under such a model the project, as described above, represents the source. The receptors represent European Sites and their associated qualifying features of interest.

Potential impact pathways are restricted to hydrological pathways and disturbance/placement pathways as these represent the principal emissions generated by activities at the project site.

European Sites and their associated qualifying features are likely to occur in the zone of influence of the project only where the above pathways establish a link between the project site and European Sites or where the project site is likely to play an important role in supporting populations of mobile species that are listed as special conservation interests/qualifying species for surrounding European Sites.

Table 5.1 provides a determination as to whether each of the European Sites listed occur within the zone of influence of the project. Figure 5.1 show the locations of the Natura 2000 sites within 15km of the proposed project.

¹¹ Connectivity is defined as a measure of the functional availability of the habitats needed for a particular species to move through a given area. Examples include the flight lines used by bats to travel between roosts and foraging areas or the corridors of appropriate habitat needed by some slow colonising species if they are to spread (CIEEM, 2018)

¹² Landscape connectivity is a combined product of structural and functional connectivity, i.e. the effect of physical landscape structure and the actual species use of the landscape (Kettunen et al. 2007)

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Table 5.1. Natura 2000 Sites within zone of influence

Natura 2000 Site Distance from Site ¹³	Qualifying Interests	Conservation Objectives	Pathway	Description of Potential Impacts from Proposed Development	Potential Pathways for Further Assessment
Special Areas of Conservation (SACs)					
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627] c. 1.8km north	Habitats: [1130] Estuaries [1140] Tidal Mudflats and Sandflats [2110] Embryonic Shifting Dunes [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes)* [5130] Juniper Scrub [6210] Orchid-rich Calcareous Grassland* [7220] Petrifying Springs* Species: [1014] Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>) [1095] Sea Lamprey (<i>Petromyzon marinus</i>) [1099] River Lamprey	To maintain or restore the favourable conservation condition of habitats and species designated within the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000627.pdf	There are no open drains or watercourses within the proposed development site boundary. The nearest mapped watercourse, the Garavogue River, is located approximately 1.7 km north of the site. There is therefore no potential for indirect effects on the SAC via surface water pathways. The site lies within the Carrowmore East WFD Groundwater Body, which also underlies a very small section of the SAC within Sligo town centre. However, given the distance between the site and the SAC, the limited extent of the shared groundwater body, and the	There will be no direct effects on this European site, as the proposed development is located entirely outside and more than 1 km from the SAC boundary. The development will not result in any loss or alteration of Annex I habitat or supporting habitat for Annex II species. Given the lack of surface water pathways and the highly attenuated nature of any potential groundwater link, no changes to the hydrological or hydrogeological regime of the SAC are predicted. As such, no significant effects on the qualifying interests or conservation objectives of the site are anticipated to arise	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC can therefore be ruled out.

¹³ Measured in a straight line between the Site and closest point of Natura 2000 site boundary

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	(<i>Lampetra fluviatilis</i>) [1365] Common (Harbour) Seal (<i>Phoca vitulina</i>)		urbanised context separating the two, any potential groundwater connectivity is highly attenuated. There is no hydrological or hydrogeological linkage capable of supporting significant transfer of pollutants or changes in water quality or hydrology between the proposed development and the SAC.	from the proposed development.	
Ballysadare Bay SAC [000622] c. 4.4km south west	Habitats: [1130] Estuaries [1140] Tidal Mudflats and Sandflats [2110] Embryonic Shifting Dunes [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes)* [2190] Humid Dune Slacks Species: [1014] Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>) [1365] Common (Harbour) Seal (<i>Phoca vitulina</i>)	To maintain or restore the favourable conservation condition of habitats and species designated within Ballysadare Bay SAC which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000622.pdf	There are no open drains or watercourses within the proposed development site boundary. The nearest mapped watercourse is located approximately 1.7 km north of the site and flows into the Garavogue River, which discharges into Sligo Bay. Ballysadare Bay SAC is located within a separate WFD surface water sub-catchment (Carrowgobbadagh_SC_010) to that of the proposed development site (Bonet_SC_030). The SAC is also located within a separate WFD groundwater body (Carrowmore West), while the	There will be no direct effects on this European site as the proposed development is located entirely outside and over 4 km south-west of the SAC boundary. No loss or degradation of Annex I habitats or supporting habitat for Annex II species will occur. Given the absence of hydrological connectivity, the location within different WFD sub-catchments and groundwater bodies, and the considerable separation distance, there is no potential for deterioration in water quality or hydrological regime within Ballysadare Bay SAC. The site does not provide	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Ballysadare Bay SAC can therefore be ruled out.

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			site lies within the Carrowmore East. Consequently, there is no surface water or groundwater linkage between the site and the SAC capable of conveying potential pollutants or changes in hydrology.	habitat suitable for any qualifying interest species. As such, no significant direct, indirect, or secondary impacts are predicted to arise.	
Lough Gill SAC [001976] c. 1.3km east	Habitats: [3150] Natural Eutrophic Lakes [6210] Orchid-rich Calcareous Grassland* [91A0] Old Oak Woodlands [91E0] Alluvial Forests* Species: [1092] White-clawed Crayfish (<i>Austropotamobius pallipes</i>) [1095] Sea Lamprey (<i>Petromyzon marinus</i>) [1096] Brook Lamprey (<i>Lampetra planeri</i>) [1099] River Lamprey (<i>Lampetra fluviatilis</i>) [1106] Atlantic Salmon (<i>Salmo salar</i>) [1355] Otter (<i>Lutra lutra</i>)	To maintain or restore the favourable conservation condition of habitats and species designated within Lough Gill SAC which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001976.pdf	There are no open drains or surface water features within the proposed development site boundary. However, the site is located within the Bonet_SC_030 WFD sub-catchment, which also encompasses Lough Gill SAC. In addition, the majority of the SAC lies within the same WFD groundwater body (Carrowmore East) as the site. On this basis, a potential hydrological and hydrogeological pathway exists between the proposed development and the SAC via the shared sub-catchment and groundwater body. Although the site is situated within a serviced urban area	There will be no direct loss or alteration of Annex I habitats or supporting habitat for Annex II species within Lough Gill SAC. However, given the presence of a potential hydrogeological linkage via the shared groundwater body, there is potential for indirect effects during construction or operation in the absence of mitigation, such as the release of pollutants or sediment to groundwater that could ultimately influence water quality within the SAC. While such risks are considered low, the potential for indirect effects on water quality and aquatic qualifying	A potential hydrological connection exists between the site and Lough Gill SAC via groundwater within the shared WFD groundwater body (Carrowmore East). Potential indirect effects on water quality and aquatic qualifying interests require further assessment to determine if significant effects can be ruled out.

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			with no direct surface water connection to Lough Gill, this potential pathway warrants consideration on a precautionary basis	interests cannot be ruled out at the screening stage.	
Union Wood SAC [000638] c. 4.8km south	Habitats: [91A0] Old Oak Woodlands	To maintain or restore the favourable conservation condition of habitats and species designated within Union Wood SAC which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000638.pdf	The Site is located outside the boundary of this SAC and there is no potential for direct effect. There is no connectivity between the Site and this SAC and the habitat for which the SAC is designated is terrestrial in nature.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 4.8 km from the SAC. The SAC is designated for terrestrial woodland habitats that do not occur within or adjacent to the proposed development site. There is no hydrological connection or other ecological linkage between the site and the SAC; therefore, no potential for direct, indirect, or secondary effects arises.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Union Wood SAC can therefore be ruled out.
Unshin River SAC [001898] c. 5.6km south west	Habitats: [3260] Floating River Vegetation [6210] Orchid-rich Calcareous Grassland* [6410] Molinia Meadows [91E0] Alluvial Forests* Species:	To maintain or restore the favourable conservation condition of habitats and species designated within Unshin River SAC which is defined by a list of specific attributes and targets.	The Site is located outside the boundary of this SAC and there is no potential for direct effect. No hydrological connectivity between the Site and the SAC was identified. The SAC is located within a separate WFD	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 5.6 km from the SAC. The site does not contain or adjoin suitable aquatic or riparian habitat for the	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation

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	[1106] Atlantic Salmon (<i>Salmo salar</i>) [1355] Otter (<i>Lutra lutra</i>)	Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001898.pdf	sub-catchment, (Owenmore[Sligo]_SC_040, Owenmore[Sligo]_SC_030 and the Unshin_SC_010) to Site (Carrowgobbadagh_SC_010). The SAC is located with a separate WFD Groundwater body to the Site. No potential for indirect effects on the SAC due to deterioration of water quality was identified. The Site does not provide suitable habitat for any of the QI species for which the SAC is designated. Given the absence of suitable habitat and the distance between the Site and the SAC, no potential for significant indirect effects via disturbance or displacement was identified.	Qualifying Interests of this SAC. No hydrological connection exists, and the development lies within a separate surface water and groundwater catchment. Therefore, there is no potential for direct, indirect, or secondary impacts on the SAC during either construction or operation of the proposed development.	objectives of Unshin River SAC can therefore be ruled out.
Ben Bulbin, Gleniff and Glenade Complex SAC [000623] c. 9 km north	Habitats: [3260] Floating River Vegetation [4010] Wet Heath [4030] Dry Heath [4060] Alpine and Subalpine Heaths [5130] Juniper Scrub [6210] Orchid-rich	To maintain or restore the favourable conservation condition of habitats and species designated within Ben Bulbin, Gleniff and Glenade Complex SAC which is defined by a list of specific attributes and	The Site is located outside the boundary of this SAC and there is no potential for direct effect. No hydrological connectivity between the Site and the SAC was identified. The SAC is located within a separate WFD	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 9 km from the SAC. The site does not contain suitable habitats for the Qualifying Interests of this SAC, which include upland,	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Ben

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	Calcareous Grassland* [6230] Species-rich Nardus Grassland* [6430] Hydrophilous Tall Herb Communities [7220] Petrifying Springs* [7130] Blanket Bogs (Active)* [7140] Transition Mires [7230] Alkaline Fens [8110] Siliceous Scree [8120] Calcareous Scree [8210] Calcareous Rocky Slopes Species: [1013] Geyer's Whorl Snail (<i>Vertigo geyeri</i>) [1355] Otter (<i>Lutra lutra</i>)	targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000623.pdf	sub-catchment to Site. The SAC is located with a separate WFD Groundwater body to the Site. No potential for indirect effects on the SAC due to deterioration of water quality was identified. The Site does not provide suitable habitat for any of the QI species for which the SAC is designated. Given the absence of suitable habitat and the distance between the Site and the SAC, no potential for significant indirect effects via disturbance or displacement was identified.	calcareous, and bog habitats. There is no hydrological or other ecological connection between the proposed development and the SAC; therefore, no potential for direct, indirect, or secondary impacts arises.	Bulben, Gleniff and Glenade Complex SAC can therefore be ruled out.
Special Protection Areas (SPAs)					
Cummeen Strand SPA [004035] c. 2.2 km north	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher	To maintain or restore the favourable conservation condition of habitats and species designated within	There are no open drains or surface water features within the proposed development site boundary. The nearest	There will be no direct effects on this European Site as the proposed development is located entirely outside and	No potential pathways for indirect or cumulative effects were identified.

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west	(<i>Haematopus ostralegus</i>) [A130] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]	the Cummeen Strand SPA which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004035.pdf	mapped watercourse (Garavogue River) is located approximately 1.7 km north of the site and discharges to Cummeen Strand SPA. However, there is no surface water connectivity between the proposed development and the SPA, and the site lies within the Carrowmore East WFD Groundwater Body, whereas the SPA lies within the separate Drumcliff–Strandhill WFD Groundwater Body. Therefore, no hydrological or hydrogeological pathway capable of transmitting pollutants or changes in water quality exists between the site and the SPA. A potential disturbance or displacement pathway through noise, lighting, or human activity was also considered. The SPA is located approximately 2.2 km from	over 2 km from the SPA boundary. The site does not contain or provide suitable habitat for any of the Special Conservation Interest (SCI) bird species listed for the SPA. A precautionary disturbance assessment was undertaken following Goodship & Furness (2022)(NatureScot Research Report 1283 ¹⁴). Indicative non-breeding-season disturbance distances for relevant species are: • Light-bellied Brent Goose – 50 to 200 m; • Oystercatcher – 150 to 300 m; and • Redshank – 200 to 300 m. The proposed development is located well beyond these distances, and therefore no potential for disturbance or displacement of SPA bird species exists.	Significant effects on the Special Conservation Interests or conservation objectives of Cummeen Strand SPA can therefore be ruled out
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¹⁴ Goodship, N.M. and Furness, R.W. (2022). Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species. NatureScot Research Report 1283.

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			the proposed development and is separated by extensive urban development and established vegetation. Given this distance and the nature of the intervening environment, no visual, auditory, or lighting disturbance that could affect waterbird populations using the SPA is anticipated.		
Ballysadare Bay SPA [004129] c. 4.4km south west	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]	To maintain or restore the favourable conservation condition of habitats and species designated within the Ballysadare Bay SPA which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004129.pdf	There are no open drains or surface water features within the proposed development site boundary. The nearest mapped watercourse is located approximately 1.7 km north of the site and flows into the Garavogue River, which discharges to Sligo Bay. Ballysadare Bay SPA is located within a separate WFD surface water sub-catchment (Carrowgobbadagh_SC_010) to that of the proposed development site (Bonet_SC_030). The SPA is also located within a separate WFD groundwater body (Carrowmore West GWB), while the site lies within the Carrowmore East GWB. As	There will be no direct effects on this European Site as the proposed development is located entirely outside and over 4 km from the SPA boundary. The site does not contain or provide suitable habitat for any of the Special Conservation Interest (SCI) bird species for which the SPA is designated. A precautionary disturbance assessment was undertaken following Goodship & Furness (2022). Indicative non-breeding-season disturbance distances for relevant species are: • Light-bellied Brent Goose	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Special Conservation Interests or conservation objectives of Ballysadare Bay SPA can therefore be ruled out.

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			such, there is no hydrological or hydrogeological linkage capable of transmitting pollutants or changes in water quality between the site and the SPA. A potential disturbance or displacement pathway was also considered. The SPA is located approximately 4.4 km south-west of the proposed development, and the surrounding urban and vegetated landscape provides substantial screening from any construction or operational noise, visual, or lighting disturbance. At this distance, no mechanism for disturbance to foraging or roosting waterbirds occurs.	– 50 to 200 m; • Grey Plover – 150 to 300 m; • Dunlin – 150 to 300 m; • Bar-tailed Godwit – 200 to 300 m; and • Redshank – 200 to 300 m. The proposed development is located well beyond these indicative disturbance distances, and no potential for direct or indirect effects on SCI bird species has been identified.	
Drumcliff Bay SPA [004013] c. 7 km northwest	Sanderling (<i>Calidris alba</i>) [A144] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wetland and Waterbirds [A999]	To maintain or restore the favourable conservation condition of habitats and species designated within the Drumcliff Bay SPA which is defined by a list of specific attributes and targets.	No hydrological connectivity between the Site and the SPA was identified. The SPA is located within a separate WFD sub-catchment to Site. The SPA is located with a separate WFD Groundwater body to the Site. No potential for indirect effects on the SPA due to deterioration of water quality was identified.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 7 km from the SPA. The site does not provide suitable or supporting habitat for the Special Conservation	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Drumcliff Bay SPA can therefore

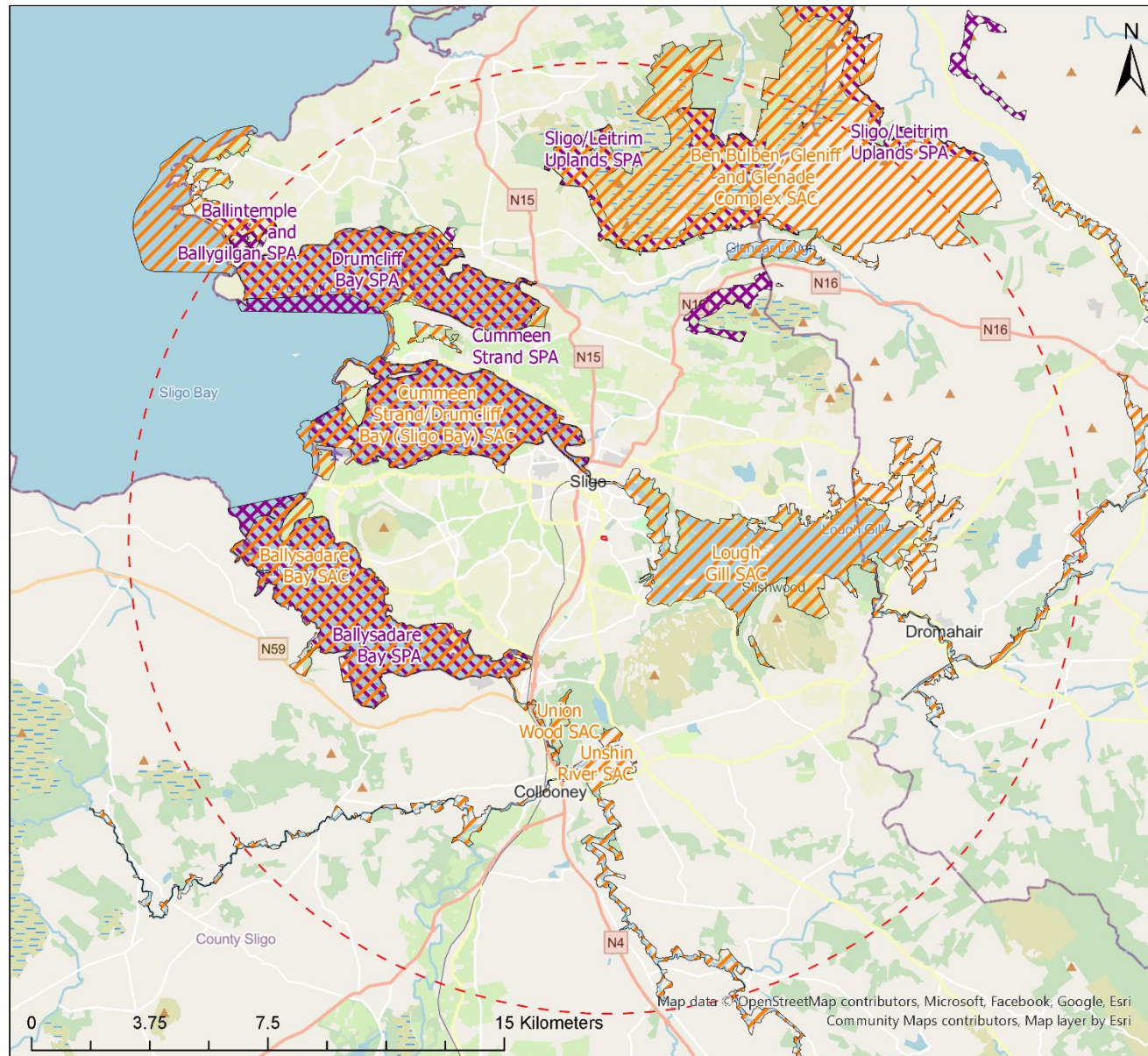
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		Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004013.pdf	The Site does not provide significant suitable habitat for any of the SCI species. Given the absence of significant habitat and the distance of 7 km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species.	Interest (SCI) bird species associated with this SPA: No hydrological connection exists, and the development lies within a separate surface water and groundwater catchment. Therefore, there is no potential for direct, indirect, or secondary impacts on the SPA during either the construction or operational phases of the proposed development.	be ruled out.
Sligo/Leitrim Uplands SPA [004187] c. 7 km north east	Peregrine (<i>Falco peregrinus</i>) [A103] Chough (<i>Pyrrhocorax pyrrhocorax</i>) [A346]	To maintain or restore the favourable conservation condition of habitats and species designated within the Sligo/Leitrim Uplands SPA which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004187.pdf	No hydrological connectivity between the Site and the SPA was identified. The SPA is located within a separate WFD sub-catchment to Site. The SPA is located with a separate WFD Groundwater body to the Site. No potential for indirect effects on the SPA due to deterioration of water quality was identified. The Site does not provide significant suitable habitat for any of the SCI species. Given the absence of significant habitat and the distance of 7 km between the Site and the SPA, there is no potential for	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 7 km from the SPA. The site does not support suitable upland or cliff habitats for the Special Conservation Interest (SCI) species (<i>Falco peregrinus</i> and <i>Pyrrhocorax pyrrhocorax</i>). There is no hydrological or ecological connection between the proposed development and the SPA;	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Sligo/Leitrim Uplands SPA can therefore be ruled out.

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			significant effects on this SPA due to disturbance of SCI species.	therefore, there is no potential for direct, indirect, or secondary effects during either the construction or operational phases.	
Ballintemple and Ballygilgan SPA [004234] c. 10 km north west	Barnacle Goose (<i>Branta leucopsis</i>) [A045]	To maintain or restore the favourable conservation condition of habitats and species designated within the Ballintemple and Ballygilgan SPA which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004234.pdf	No hydrological connectivity between the Site and the SPA was identified. The SPA is located within a separate WFD sub-catchment to Site. The SPA is located with a separate WFD Groundwater body to the Site. No potential for indirect effects on the SPA due to deterioration of water quality was identified. The Site does not provide significant suitable habitat for any of the SCI species. Given the absence of significant habitat and the distance of 10 km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 10 km from the SPA. The site does not contain or adjoin suitable coastal or intertidal habitats for <i>Branta leucopsis</i> (Barnacle Goose), the Special Conservation Interest of this SPA. There is no hydrological or ecological connection between the site and the SPA; therefore, no potential for direct, indirect, or secondary impacts arises during either the construction or operational phases of the proposed development.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Ballintemple and Ballygilgan SPA can therefore be ruled out.

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Cairns Road Housing Development

Figure 5.1
Natura 2000 Sites within 15km of the Proposed Development

- Site Boundary
- 15km Buffer
- SACs
- SPAs

As shown in Table 5.1, a functional pathway exists between Lough Gill SAC and the Site. All other Natura 2000 sites can be excluded due to the absence of functional impact pathways between the project site and the European Sites and will ensure that the project will not have the potential to result in likely significant effects to the future conservation status of qualifying features of interest and special conservation interests for which these European Sites are designated and will not undermine the achievement of their site-specific conservation objectives.

5.2 Description of Natura 2000 Sites

Lough Gill SAC:

Lough Gill SAC (Site Code 001976) is located on the border between County Sligo and County Leitrim and includes the entirety of Lough Gill, its associated shoreline, and adjoining habitats. The lake is approximately 8 km long and over 20 m deep in places, bordered by steep wooded slopes, calcareous grasslands, and a number of inflowing and outflowing rivers and streams. The site is designated for a range of Annex I habitats and Annex II species, reflecting the diversity of terrestrial and aquatic ecosystems present. The qualifying habitats include natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation [3150], orchid-rich calcareous grassland [6210], *old sessile oak woods* [91A0], and *alluvial forests* [91E0]. Qualifying species include white-clawed crayfish (*Austropotamobius pallipes*), sea lamprey (*Petromyzon marinus*), brook lamprey (*Lampetra planeri*), river lamprey (*Lampetra fluviatilis*), Atlantic salmon (*Salmo salar*), and otter (*Lutra lutra*).

Lough Gill is a naturally eutrophic lake with steep limestone shores, underwater cliffs, and shallow margin zones supporting reed-swamp and sedge communities such as *Phragmites australis*, *Scirpus lacustris*, and *Carex* spp. Where the slopes are steepest, aquatic macrophyte growth is limited due to rapid depth increase. The surrounding woodlands are dominated by oak (*Quercus petraea*), holly (*Ilex aquifolium*), rowan (*Sorbus aucuparia*), and birch (*Betula* spp.), with yew (*Taxus baccata*) and the Strawberry Tree (*Arbutus unedo*) also present — the latter representing its most northerly occurrence in the world. The calcareous grasslands on limestone outcrops support a rich flora, including several orchid species. The alluvial and wet woodland habitats, found along the lake's inflowing streams and margins, are typically dominated by alder (*Alnus glutinosa*) and ash (*Fraxinus excelsior*).

The lake and its tributaries provide important spawning and nursery areas for salmonids and lamprey species, and the catchment supports a good population of the white-clawed crayfish. Otters are widespread throughout the site, using the lake margins and riverbanks for foraging and holt sites. Lough Gill also supports a variety of rare or scarce plant species, including Bird's-nest Orchid (*Neottia nidus-avis*), Yellow Bird's-nest (*Monotropa hypopitys*), and Ivy Broomrape (*Orobancha hederaceae*). The diversity of habitats within the site, from deep open water to mature woodland, wet grassland, and calcareous grassland, supports a wide range of fauna and flora, making Lough Gill SAC of considerable conservation importance both regionally and nationally.

5.3 Conclusions of Screening for Appropriate Assessment

In accordance with Article 6(3) of the Habitats Directive, this Screening for Appropriate Assessment has examined the characteristics of the Proposed Development and its relationship with Natura 2000 sites within the potential zone of influence.

The Proposed Development is not directly connected with or necessary to the management of any Natura 2000 site. There will be no direct loss, fragmentation or degradation of habitats within any designated site, as the Application Site does not overlap with or adjoin the boundary of any European site.

The nearest European site is Lough Gill SAC [001976], located approximately 1.3 km east of the proposed development. The Application Site lies within the Bonet_SC_030 WFD sub-catchment and the Carrowmore East WFD Groundwater Body, which also encompasses Lough Gill SAC. While there are no surface watercourses or drainage features within or adjacent to the Application Site that provide a surface water connection to the SAC, an indirect hydrogeological pathway exists via the shared groundwater body.

On this basis, potential indirect effects on the SAC cannot be excluded at the screening stage, particularly in relation to groundwater quality, arising from construction-phase activities involving ground disturbance, material handling and accidental pollution events. Given the presence of this indirect pathway, and applying the precautionary principle, it is not possible to conclude beyond reasonable scientific doubt at the screening stage that the Proposed Development, either alone or in combination with other plans or projects, will have no significant effects on the qualifying interests of Lough Gill SAC.

In accordance with Article 6(3) of the Habitats Directive and relevant national and European guidance, it is therefore concluded that the Proposed Development must proceed to Stage 2 Appropriate Assessment (Natura Impact Statement) to assess, in detail, whether the project, individually or in combination with other plans or projects, is likely to adversely affect the integrity of Lough Gill SAC [001976].

6. Stage 2- Natura Impact Statement

The competent authority will be required to carry out an appropriate assessment to determine whether the proposed development would adversely affect the integrity of Lough Gill SAC. The 'integrity of the site' can be defined as 'the 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 headings within the appropriate assessment report template provided in the European Commission guidance document 'Assessment of plans and projects significantly affecting Natura 2000 sites' have been used to provide a framework to examine the potential impacts of the proposed project on Lough Gill SAC.

6.1 Assessment of the effects of the project on the integrity of Natura 2000 Sites

This section of the report sets out the potential effects of the project (either alone or in combination with other projects or plans) on the integrity of Lough Gill SAC with respect to the conservation objectives of this site and to its structure and function. The focus is on demonstrating, with supporting evidence, that there will be no adverse effects on the integrity of Lough Gill SAC should the proposed development proceed as planned and with appropriate mitigation.

6.1.1 Elements of the project or plan (alone or in combination with other projects or plans) that are likely to give rise to significant effects on the environment.

The proposed development comprises the construction of 51 residential units on a site of approximately 1.54 hectares at Cairns Road, Sligo. The development includes associated internal access roads, footpaths, car parking, public open space, landscaping, public lighting and connections to foul and surface water drainage infrastructure.

The site lies within the Bonet_SC_030 WFD sub-catchment and within the Carrowmore East WFD Groundwater Body, which also encompasses Lough Gill SAC [001976]. The proposed development site is located entirely outside the boundary of the SAC. There are no surface watercourses or drainage features within or adjacent to the site that provide a direct surface water connection to Lough Gill SAC. Accordingly, no surface water pathway exists between the site and the SAC.

The only potential pathway by which the proposed development could influence Lough Gill SAC is indirect hydrogeological connectivity via the shared groundwater body. Any interaction between the development and the SAC would therefore have to occur through subsurface movement of water within soils, subsoils and underlying geological strata.

Elements of the project that have the potential to give rise to effects on the receiving environment, either alone or in combination with other plans or projects, are primarily associated with construction-phase ground disturbance and changes to land cover. These include site clearance and excavation for building foundations, services and internal roads, which will involve exposure of soil and subsoil and could increase the potential for mobilisation of fine sediments or contaminants capable of entering the groundwater environment.

The storage and temporary stockpiling of excavated materials and topsoil may give rise to sediment or nutrient mobilisation, with potential for downward migration to groundwater. Construction activities involving the storage, handling and use of fuels, concrete and other materials also present a potential

source of localised contamination of soils, which could interact with the groundwater pathway in the absence of controls.

The operation and movement of construction machinery may result in minor releases of hydrocarbons or lubricants, while dewatering or temporary drainage of excavations, where required, may generate turbid water with the potential to interact with subsurface pathways.

During the operational phase, surface water arising within the development will infiltrate to ground within the Carrowmore East Groundwater Body, maintaining an indirect hydrogeological connection with Lough Gill SAC. Foul wastewater generated by the development will be conveyed via the public foul sewer network for off-site treatment. No direct discharge pathway to surface waters associated with Lough Gill SAC is identified.

6.1.2 Conservation Objectives of the Natura 2000 sites

The conservation objectives for the Lough Gill SAC, the list of specific attributes and the targets defining the conservation objectives for each qualifying interest (likely to be affected), are listed within the supporting information available on the NPWS website. These conservation objectives were considered when preparing this report.

The conservation objectives for the Lough Gill SAC can be broadly summarised as:

- To maintain or restore the favourable condition of the habitats and species for which the SAC has been designated.

6.1.3 Site Specific Pressures and Threats

As per the Natura 2000 Data Form, for the Lough Gill SAC, the site-specific threats, pressures and activities with potential to impact on the European Site were reviewed and considered in relation to the Proposed Development. These are provided in the tables below.

Table 6.1: Site-Specific Pressures and Threats for Lough Gill SAC

Rank	Negative Threats and Pressures		Inside/Outside
High	E01.01	continuous urbanisation	Both
Low	B	Sylviculture, forestry	Inside
Low	E03.03	disposal of inert materials	Inside
Low	G01.01.01	motorized nautical sports	Inside
Low	J02.05.02	modifying structures of inland water courses	Inside
Low	J02.10	management of aquatic and bank vegetation for drainage purposes	Inside
Medium	A10.01	removal of hedges and copses or scrub	Inside
Medium	B06	grazing in forests/ woodland	Inside
Medium	D01.01	paths, tracks, cycling tracks	Inside
Medium	E01.03	Dispersed habitation	Inside
Medium	I01	Invasive non-native species	Inside

6.1.4 How the Project will affect key species and habitats.

The Qualifying Interests of Lough Gill SAC [001976] that are potentially at risk from the proposed development are those that are aquatic or otherwise reliant on the maintenance of suitable water quality within the lake and its associated aquatic environment, and therefore sensitive to changes in water quality or hydrology. These include:

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- [3150] Natural Eutrophic Lakes
- [91E0] Alluvial Forests* (priority habitat)
- [1092] White-clawed Crayfish (*Austropotamobius pallipes*)
- [1095] Sea Lamprey (*Petromyzon marinus*)
- [1096] Brook Lamprey (*Lampetra planeri*)
- [1099] River Lamprey (*Lampetra fluviatilis*)
- [1106] Atlantic Salmon (*Salmo salar*)
- [1355] Otter (*Lutra lutra*)

The remaining Qualifying Interests of Lough Gill SAC, namely [6210] Orchid-rich Calcareous Grassland* and [91A0] Old Sessile Oak Woods with *Ilex* and *Blechnum* in the British Isles, are terrestrial habitats that are not dependent on groundwater quality or hydrological connectivity with the proposed development site for their ecological function.

The proposed development is located entirely outside the boundary of Lough Gill SAC [001976] and will not result in any direct impacts such as habitat loss, fragmentation or physical alteration of the designated site. There are no surface watercourses or drainage features within or adjacent to the site that connect to Lough Gill SAC. However, the site lies within the same WFD groundwater body (Carrowmore East) as the SAC, and therefore an indirect hydrogeological pathway exists between the site and the SAC via subsurface groundwater movement.

The primary potential for adverse effects arises from a temporary deterioration in groundwater quality associated with construction-phase ground disturbance and construction activities. Works such as site clearance, excavation for dwellings and services, temporary stockpiling of soils, and the operation of construction machinery may increase the risk of localised sediment mobilisation or the percolation of contaminants, such as hydrocarbons, concrete wash water or suspended solids, to the subsurface environment.

Should such materials enter the groundwater body and migrate through it, there is a potential for indirect effects on water quality within Lough Gill SAC. A deterioration in water quality could, in turn, affect the Natural Eutrophic Lake habitat [3150] and associated aquatic Qualifying Interests, including White-clawed Crayfish [1092], Lamprey species [1095, 1096, 1099] and Atlantic Salmon [1106]. Otter [1355], which relies on aquatic habitats and prey resources within the SAC, could also be indirectly affected through trophic pathways should changes in aquatic habitat quality or prey availability occur. Although any such pathway would be indirect, diffuse and subject to attenuation over a separation distance of approximately 1.3 km, it cannot be fully excluded at this stage of the assessment.

During the operational phase, foul wastewater generated by the development will be conveyed off site via the existing municipal sewer network for treatment. There will be no direct discharge to surface waters associated with Lough Gill SAC. The only ongoing linkage between the site and the SAC is the shared underlying groundwater body, through which any interaction would occur indirectly via natural subsurface groundwater movement rather than through any defined discharge pathway.

In summary, the potential impacts associated with the proposed development are indirect and hydrological in nature, limited to the possibility of short-term changes in groundwater quality during the construction phase, with a theoretical potential to indirectly affect aquatic habitats and species, including otter, within Lough Gill SAC.

6.1.5 How is the integrity of the Natura 2000 site likely to be affected by the project

In accordance with Article 6(3) of the Habitats Directive, the potential for the proposed development to affect the integrity of Lough Gill SAC [001976] has been assessed in view of the site's conservation objectives and the ecological requirements of its Qualifying Interests.

A deterioration in groundwater quality as a result of the proposed development could, in the absence of mitigation, affect aquatic and groundwater-dependent habitats and species within Lough Gill SAC. A reduction in groundwater quality during construction could lead to increased sedimentation, nutrient enrichment, or accidental pollution, potentially altering the physicochemical conditions that support the site's sensitive habitats and species. The key pathways relate to infiltration of contaminants to groundwater during groundworks, excavation, and material handling.

The potential implications for the integrity of each relevant Qualifying Interest are outlined below.

Natural Eutrophic Lakes [3150]

This habitat depends on maintaining high water quality and natural nutrient dynamics. Elevated levels of suspended solids or nutrient inputs arising from accidental releases of sediment or construction-related materials could affect aquatic vegetation communities by increasing turbidity or promoting algal growth. Changes in nutrient balance may reduce light penetration and alter the structure of aquatic macrophyte assemblages. In the absence of appropriate mitigation, temporary degradation of groundwater quality supporting this habitat could affect its structure and function, thereby compromising the conservation objectives of the SAC.

Alluvial Forests [91E0] (Priority Habitat)

Alluvial forests occur along riparian zones influenced by flooding and groundwater. These habitats are sensitive to changes in hydrology and water quality. Groundwater contamination during construction, such as through hydrocarbons, cement wash water, or suspended solids, could alter soil moisture chemistry or nutrient balance, affecting regeneration and species composition within these wet woodlands. While the development site is located over 1 km from the SAC, indirect groundwater movement could, if unmitigated, influence water quality parameters that support these habitats.

White-clawed Crayfish (*Austropotamobius pallipes*) [1092]

White-clawed Crayfish is highly sensitive to pollution, sedimentation, and reductions in dissolved oxygen. Even minor contamination of groundwater feeding Lough Gill or its tributaries could impact crayfish populations through gill clogging, reduced food availability, or mortality from toxic substances. The species' dependence on clean, well-oxygenated water means that any deterioration in groundwater quality associated with the construction phase could adversely affect its habitat quality and population viability.

Sea Lamprey (*Petromyzon marinus*) [1095], Brook Lamprey (*Lampetra planeri*) [1096], River Lamprey (*Lampetra fluviatilis*) [1099]

All three lamprey species require clean, silt-free substrates for spawning and juvenile development. Sediment mobilisation or chemical contamination of groundwater entering tributary streams could increase turbidity and smother spawning gravels, reducing oxygen availability and interfering with larval feeding. Pollution events during construction could also impair adult migratory behaviour or reduce the availability of suitable spawning sites. Without effective pollution prevention, the project

could compromise the conservation objectives for these species by degrading spawning and nursery habitats.

Atlantic Salmon (*Salmo salar*) [1106]

Atlantic Salmon depends on high water quality and well-oxygenated conditions for all life stages. Increased suspended solids, nutrient enrichment, or contamination arising from unmitigated construction activities could affect spawning and nursery habitat quality in tributary streams feeding Lough Gill. Such effects could reduce egg survival and juvenile recruitment. In addition, hydrocarbon or chemical pollutants could have acute toxic effects on early life stages. Consequently, any deterioration in groundwater quality connected to the SAC could compromise the ecological conditions required to maintain favourable conservation status for this species.

Otter (*Lutra lutra*) [1355]

Otters rely on good water quality and abundant aquatic prey, including fish and crayfish, within riverine and lacustrine habitats. Indirect deterioration of water quality within Lough Gill or its feeder streams could reduce prey availability, indirectly affecting foraging success and distribution. While the proposed development will not cause direct disturbance or habitat loss for otters, pollution of groundwater supporting the SAC could have secondary effects on prey species, thereby influencing the site's capacity to sustain viable otter populations.

6.1.6 Likely Cumulative Impact of the Proposed Works on European Sites, in-combination with other plans and projects

A search and review in relation to other projects and/or plans that may have the potential to result in cumulative and/or in-combination impacts on European Sites was conducted. This assessment focuses on the potential for cumulative in-combination effects on the European Sites where potential for adverse effects was identified. This included a review of online Planning Registers, development plans and other available information and served to identify past and future projects and/or plans, their activities and their predicted environmental effects.

Assessment material for this in-combination impact assessment was compiled on the relevant developments within the vicinity of the proposed project and was verified in December 2025. The material was gathered through a search of relevant online Planning Registers, reviews of relevant documents, planning application details and planning drawings, and served to identify past and future projects and/or plans, their activities and their environmental impacts. All relevant projects and/or plans were considered in relation to the potential for in-combination effects. Relevant data was reviewed (e.g. individual EISs/EIARs, NISs, layouts, drawings etc.) for all relevant projects and/or plans where available.

The following plans have been reviewed and taken into consideration as part of this assessment:

- Sligo County Development Plan 2024 – 2030
- 4th National Biodiversity Action Plan 2023-2027
- Sligo Biodiversity Action Plan 2024-2030

The review focused on policies and objectives that relate to European Designated Sites.

In addition to the strategic plans previously outlined, a review of planning applications within a 2 km radius of the site over the past five years was undertaken using the online planning portal maintained

by Sligo County Council. The review identified a range of developments typical of Sligo's highly developed setting. These include applications for housing estates, home renovations, extensions, refurbishments, and alterations to existing dwellings, reflecting ongoing residential improvements.

The review did not identify any permitted or proposed projects involving large-scale land-use change, significant abstraction or discharge to groundwater or surface waters, or other activities that would introduce new or intensified pathways of effect to European Sites beyond those already considered within this assessment. Where larger developments have occurred or are proposed within the wider area, these have been subject to appropriate environmental assessment through the planning process, including Appropriate Assessment, EclA and/or EIA, as required.

Having regard to the nature and scale of the proposed development, the existing urban context, the findings of environmental assessments undertaken for other relevant plans and projects, and the absence of additional credible pathways for cumulative effects, it is concluded that the proposed development will not give rise to cumulative or in-combination effects on European Sites.

6.1.7 Mitigation Measures

Roles and Responsibilities

The main contractor will be required to designate a member of staff, or engage a specific person, with demonstrable experience of environmental management and monitoring on construction sites. The appointed individual will assume responsibility for overseeing the implementation of all environmental protective measures.

The contractor will be responsible for ensuring all mitigation measures set out in this document, CEMP and any site-specific method statements are fully and correctly implemented. The contractor will be responsible for employing good working practice during all phases of the project. The appointed contractor will be responsible for providing a briefing on environmental protection measures and ecological sensitivities of the Site to all site personnel in advance of commencement of works.

The names and contact details of the individuals with responsibility for implementation and supervision of mitigation measures during all phases of the development will be clearly identified and displayed on notice boards at the site office as well as set out in documents such as the site-specific method statements as appropriate.

Outline Construction Environmental Management Plan (OCEMP)

An Outline Construction Environmental Management Plan (OCEMP) has been prepared for the proposed development and will be further developed and implemented prior to the commencement of construction works. The purpose of the CEMP is to ensure that construction activities are carried out in a manner that minimises environmental risk, prevents pollution and protects the receiving environment, with particular regard to the identified indirect hydrogeological pathway linking the site to Lough Gill SAC [001976].

The CEMP will set out the contractor's responsibilities to adhere to best practice construction and environmental protection measures throughout the construction phase. It will include procedures to manage activities that could otherwise give rise to impacts on soil, groundwater and water quality, particularly during site clearance, excavation and material handling works.

Measures within the CEMP will include controls relating to surface water and groundwater protection, including the management of surface water arising during construction to prevent sediment-laden or

contaminated runoff entering the subsurface environment. This will include appropriate management of excavations, stockpiles and temporary drainage, with measures to reduce the risk of sediment mobilisation and percolation to groundwater.

Pollution prevention measures will be detailed within the CEMP, including protocols for the storage, handling and use of fuels, oils, concrete and other potentially hazardous substances. Spill prevention and response procedures will be included, with provision for spill kits on site and clear procedures for containment and clean-up in the event of accidental releases.

Measures to protect groundwater during excavation and subsurface works will be included, addressing the management of dewatering (if required), prevention of contaminant infiltration, and rapid response to any accidental spills or leaks that could affect soil or groundwater quality.

The CEMP will also include measures for the control of dust, noise and vibration during construction, including management of exposed soils and stockpiles, control of vehicle movements, maintenance of plant and equipment, and adherence to appropriate working hours to minimise nuisance and disturbance to surrounding receptors.

Waste management procedures will be set out within the CEMP, including the segregation, storage, removal and disposal of construction waste in accordance with relevant legislative requirements and best practice.

The CEMP will provide for monitoring and reporting arrangements, including regular site inspections to verify the effectiveness of environmental protection measures and procedures for corrective action where required. A suitably qualified site representative will be responsible for overseeing implementation of the CEMP and ensuring compliance throughout the construction phase.

The CEMP will be treated as a live document and will be reviewed and updated as necessary during the construction period to reflect changes in site activities, conditions or regulatory requirements, including any conditions attached to the planning permission..

Good Working Practice

Good working practices such as those set out in, but not limited to the following will be followed at all times:

- CIRIA Report C741 Environmental Good Practice on Site (4th Edition, 2015)
- CIRIA Report C532 Control of Water Pollution from Construction Sites (2001)
- Environment Agency Pollution Prevention Guidelines (PPGs), specifically PPG1, PPG5, and PPG6
- Uisce Éireann Code of Practice for Wastewater Infrastructure
- Greater Dublin Strategic Drainage Study (GDSDS) Volume 2: New Developments

Refuelling, Storage and Handling of Hazardous Materials

- Where practicable, plant refuelling will be undertaken off site at authorised facilities. Where on-site refuelling is required, it will be carried out by trained personnel using drip trays and fuel-absorbent mats, and refuelling operations will not be left unattended.
- Refuelling, storage and maintenance of plant will take place only in designated areas away from excavations and areas of exposed soil to minimise the risk of contaminants entering the subsurface environment.

- All fuels, oils and hazardous materials will be stored within appropriate secondary containment systems capable of holding at least 110% of the stored volume.
- Spill kits, absorbent materials and hydrocarbon pads will be maintained on site and readily available at all times. Any accidental spill will be contained immediately, with contaminated material removed and disposed of at an authorised facility.
- Mobile fuel bowsers will be parked on hardstanding or impermeable surfaces and secured when not in use.
- All machinery will be regularly inspected and maintained to prevent leaks of fuel, oil or hydraulic fluid.
- No concrete batching will take place on site. All concrete will be delivered ready-mixed, and concrete washout will occur off site at authorised facilities only.

Excavations, Earthworks and Temporary Stockpiles

- Excavations will be undertaken in a phased manner to minimise the extent and duration of exposed soil and subsoil.
- Where feasible, excavated material will be reused on site for backfilling and landscaping. Material unsuitable for reuse will be removed to an authorised facility.
- Temporary stockpiles of soil and excavated material will be located away from drainage routes and areas of infiltration and will be appropriately managed to prevent erosion, runoff or leaching.
- Stockpiles will be covered or otherwise stabilised during periods of heavy rainfall or inactivity to reduce sediment mobilisation.
- Any water arising within excavations will be managed in a controlled manner to prevent sediment-laden or contaminated water infiltrating to ground.
- Disturbed areas will be reinstated as soon as practicable following completion of works to stabilise soils and reduce the potential for sediment mobilisation.

Surface Water and Groundwater Protection During Construction

- Temporary surface water management measures will be implemented during construction to control runoff from disturbed areas and to prevent the infiltration of sediment-laden or contaminated water to the underlying groundwater body.
- Construction activities will be planned and sequenced to limit the extent of open ground at any one time.
- Construction materials will be stored in a manner that prevents contact with runoff or infiltration pathways.

Operational Phase – Surface Water and SuDS Management

- Surface water arising during the operational phase will be managed on site via a Sustainable Drainage System (SuDS) designed to control runoff and protect water quality prior to infiltration to ground.
- The SuDS system incorporates treatment stages to address suspended solids and hydrocarbons prior to infiltration within the Carrowmore East Groundwater Body.
- The drainage system has been designed to accommodate extreme rainfall events, including an allowance for climate change, ensuring controlled infiltration and avoidance of uncontrolled runoff.

- Routine inspection and maintenance of SuDS infrastructure will be undertaken to ensure continued performance and protection of groundwater quality, including removal of accumulated sediment where necessary.
- Any damage to SuDS infrastructure during the lifetime of the development will be repaired promptly to maintain treatment capacity and prevent untreated infiltration.

Landscaping and Biodiversity Measures

- Landscaping will be implemented in accordance with the approved Landscape Design Report, using native and locally appropriate plant species where feasible.
- Planting will be designed to stabilise soils, reduce erosion and contribute to overall site permeability, supporting groundwater protection.
- Non-native invasive species will not be planted.
- Landscaped areas will be subject to an establishment and maintenance period to ensure successful planting and long-term functionality.

Wastewater and Utilities

- All foul wastewater generated by the development will discharge to the public foul sewer network under agreement with Uisce Éireann and will be treated at the municipal wastewater treatment plant.
- No foul wastewater will be discharged to ground or surface waters.
- Utility infrastructure will be installed and maintained in accordance with relevant standards to prevent leakage or contamination of soil or groundwater.

7. Concluding Statement

This Natura Impact Statement has assessed the potential for the proposed residential development at Cairns Road, Co. Sligo to adversely affect the integrity of European Sites, either alone or in combination with other plans or projects, in accordance with the requirements of Article 6(3) of the Habitats Directive.

The assessment has identified Lough Gill SAC [001976] as the only European Site for which a potential pathway for effects exists. The proposed development is located entirely outside the boundary of the SAC and there are no surface watercourses or ecological connectivity pathways linking the site to the designated area. The only potential mechanism for interaction between the development and the SAC is an indirect hydrogeological pathway via the shared Carrowmore East WFD Groundwater Body.

Potential effects were considered in relation to groundwater quality during the construction phase, with a theoretical potential for indirect effects on the Natural Eutrophic Lake habitat [3150] and associated aquatic species, including White-clawed Crayfish, lamprey species, Atlantic Salmon and Otter, should deterioration in groundwater quality propagate to Lough Gill. No direct impacts, such as habitat loss, fragmentation or disturbance within the SAC, were identified.

The assessment has been undertaken on the basis of best scientific knowledge, using a precautionary approach and assuming a reasonable worst-case scenario where uncertainty exists. It has considered the characteristics of the proposed development, the sensitivities of the qualifying interests of Lough Gill SAC, the nature of the identified pathway, and the mitigation measures proposed to prevent deterioration of groundwater quality.

Having regard to the indirect and diffuse nature of the hydrogeological pathway, the scale and nature of the proposed development, and the full and effective implementation of the mitigation measures set out in this Natura Impact Statement, including those to be delivered through the Construction Environmental Management Plan and the operational drainage and SuDS strategy, it is concluded that the proposed development will not adversely affect the integrity of Lough Gill SAC [001976].

It is therefore concluded, beyond reasonable scientific doubt, that the proposed development, either alone or in combination with other plans or projects, will not have adverse effects on the integrity of any European Site, having regard to the conservation objectives of Lough Gill SAC.

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