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Proposed Housing Development,

Burmah Road,

Strandhill,

Co. Sligo

Appropriate Assessment Screening Report

&

Natura Impact Statement

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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

Kilcawley Buildings and Civil Engineering (Sligo) Ltd. intend to apply for permission for a residential development at Burmah Road, Strandhill, Co. Sligo, to include:

- The construction of 33 no. residential units comprising of 2 no. 1 bed, 8 no. 2 beds, 13 no. 3 beds, 1 no. 4 beds and 9 no. 5 beds;
- New vehicular entrance, boundaries and the construction of a new section of footpath along the southern boundary;
- Connection to all existing services and public sewers including sustainable urban drainage systems;
- LED street lighting on 6m root mounted columns;
- Supporting development works including associated car parking, together with all associated site works and services.

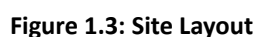
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Burmah Road Residential Development

Figure 1.1
Site Location

 Site Boundary



A Drainage Design Report was prepared by CST Group Chartered Consulting Engineers on behalf of Kilcawley Building and Civil Engineering Ltd in June 2025, to inform the proposed residential development at Burma Road, Strandhill, Co. Sligo. The report (ref. 119229) outlines the proposed surface water and foul water management strategies and includes supporting technical calculations, simulations, and design drawings presented in Appendices A–E of the Drainage Design Report.

Due to the clay-based soils and poor infiltration capacity, infiltration systems such as soakaways were ruled out. Instead, a gravity-fed, piped system will collect and convey surface water to an existing 300 mm storm sewer on Burma Road. Flows will be regulated by a Hydrobrake Optimum® flow control device to limit discharge to 5.91 l/s under all storm conditions up to the 1 in 30-year return period, with a 20% allowance for climate change. To achieve this, surface water will be temporarily stored in

a below-ground attenuation tank system, sized to provide 492 m³ of storage. The tanks will be located partially beneath the proposed road network and partially within an open space area. For extreme storm events (1 in 100-year), additional flows will bypass the Hydrobrake via a high-level overflow orifice. Modelling confirms that this will result in only minor surface ponding within the lower road network, which will safely discharge towards Burma Road and will not affect any dwellings. Hydraulic simulations and catchment data are presented in Appendices B1 and B2 of the Drainage Design Report, and full layout and infrastructure details are provided in Appendices D and E.

Foul drainage will be managed via a gravity-fed network discharging to the existing public foul sewer on Burma Road. Uisce Éireann has confirmed sufficient capacity at the proposed connection point. The design is based on standard domestic loading assumptions of 250 l/person/day and an occupancy rate of three persons per dwelling, with supporting calculations provided in Appendix C of the Drainage Design Report. The network has been modelled using MicroDrainage software and complies with Uisce Éireann standards.

Pollution prevention will be achieved through the installation of trapped road gullies and provision for ongoing maintenance. While the Drainage Design Report does not assess potential effects on European sites, the proposed drainage scheme is designed to be impact-neutral with respect to surface water and foul water discharge. Given the inclusion of flow controls, attenuation storage, and pollution mitigation, it is considered that the risk of indirect hydrological or water quality effects on any downstream European site is negligible.



Figure 1.4: Drainage Layout

1.2.2 Wastewater

Foul drainage will be managed via a gravity-fed network discharging to the existing public foul sewer on Burma Road. Uisce Éireann has confirmed sufficient capacity at the proposed connection point. The design is based on standard domestic loading assumptions of 250 l/person/day and an occupancy rate of three persons per dwelling, with supporting calculations provided in Appendix C of the Drainage Design Report. The network has been modelled using MicroDrainage software and complies with Uisce Éireann standards. Uisce Éireann issued a Confirmation of Feasibility (Ref: CDS24005990, dated 14 October 2024) for the proposed residential development of 33 units at Burmah Road, Strandhill, Co. Sligo. The feasibility assessment confirmed that both water and wastewater connections are technically feasible, subject to necessary network upgrades. The nearest Uisce Éireann-owned water main is located approximately 25 m west of the site, and a network extension will be required to facilitate connection. The existing 150 mm foul sewer at the site frontage lacks sufficient capacity to accommodate the proposed development; however, capacity exists within a 225 mm sewer to the south (manhole ref. SG61352802). Hydraulic assessment indicates that a gravity connection may not be achievable, and a pumped rising main will therefore be required.

1.2.3 Lighting

A detailed lighting design for the proposed development at Burmah Road, Strandhill was prepared by Urbis Schreder Ltd (Drawing and Report Ref: OP47585LSS9822, dated 9 October 2025). The lighting scheme was designed in accordance with BS 5489-1:2020, Category P4, which specifies a minimum horizontal illuminance of 1 lux and an average illuminance between 5 and 7.5 lux for residential and low-traffic environments. The design adheres to the HEA/HEMSA Guidance Note (CDM2015 Regulations, Issue 1.1) and represents an outline lighting layout optimised for pedestrian and vehicular safety while minimising obtrusive light.

The design employs Urbis AXIA 3 EVO 1 LED luminaires (warm white, 2700 K colour temperature) with integrated lenses and rear louvers to control light spill. Two luminaire types are used: fourteen Type A fittings and three Type B fittings, each mounted at 6 m height with a 0.2 m outreach. The warm white spectrum and directional optics have been selected to reduce blue-light emissions and minimise potential disturbance to nocturnal wildlife, particularly bats. A maintenance factor of 0.89 was applied.

Lighting calculations demonstrate that the scheme achieves average horizontal illuminance levels of approximately 5.8 lux (Eav) on Grid 1 and 6.05 lux on Grid 2 (minor road), with minimum recorded values of 1.04 lux and 1.58 lux respectively. The results are consistent with the target standards for Category P4 lighting, ensuring sufficient illumination for safety while maintaining low luminance contrast and restricted upward light.

The proposed lighting layout and specification are compatible with bat-friendly design principles, as the system uses low-intensity, warm-spectrum (≤ 3000 K) LEDs with directional optics and shielding to focus light downwards and avoid unnecessary illumination of vegetated boundaries, treelines or potential bat commuting corridors. Consequently, the lighting strategy is considered to pose minimal ecological risk and aligns with recognised best practice guidance for limiting artificial lighting impacts on wildlife.



The proposed landscaping scheme for the Strandhill residential development, as set out in the Landscape Masterplan prepared by Cunnane Stratton Reynolds (Drawing No. 20300_A-1-100-A, dated August 2025), aims to create an attractive, high-quality, and ecologically functional residential environment. The landscape design provides for a mix of formal and informal open spaces, biodiversity-friendly planting, and Sustainable Urban Drainage System (SuDS) features that together enhance visual amenity, promote community use, and improve ecological connectivity and habitat diversity within the site.

A network of footpaths and shared surfaces links the open space with the residential streets and home-zone areas. Within these shared spaces, street trees with a minimum 2 m clear stem (for road safety) are proposed to provide structure, shade, and seasonal interest. Indicative species include Scots pine (*Pinus sylvestris*), sessile oak (*Quercus petraea*), whitebeam (*Sorbus aria*), and rowan (*Sorbus*

aucuparia). These native and semi-native trees will enhance visual character while supporting local insect and bird populations.

Boundary planting includes the creation of native hedgerows and associated understorey vegetation, which will function as ecological corridors for small birds and mammals. Species mixes will be native and of local provenance, supporting pollinators and contributing to ecological connectivity between the development and surrounding habitats. A native clipped hedge is also proposed in selected areas to provide privacy screening between public and private spaces.

Biodiversity and pollinator enhancement have been prioritised throughout the landscape design, with a minimum of 75% of planting species specified as pollinator-friendly. Public open-space and SuDS areas will include wildflower meadow and native grass mixes to provide a more naturalistic appearance and reduce mowing requirements.

SuDS features are integrated across the layout in the form of planted rain gardens designed to intercept and treat surface water runoff. These will be planted with moisture-tolerant native species, contributing to local biodiversity while improving water quality and infiltration. The inclusion of rain gardens and permeable shared surfaces will support site drainage and reduce the risk of localised flooding, while providing ecological and aesthetic benefits.

Low shrub and perennial planting beds are proposed around dwellings and in communal areas to create seasonal colour and visual variety. These are complemented by small/garden trees and ornamental boulders retained from site excavations to further naturalise the design. Landscaped embankments and boundary treatments, including hedges on clay ditches and rendered walls with railings, will soften the site margins and provide an appropriate visual transition between the development and its surroundings.

Cycle parking and home-zone design elements have been incorporated to promote sustainable travel and safe, low-speed movement through the site. The planting design and open-space layout also allow for passive surveillance from surrounding dwellings, ensuring that the public areas are safe and well-overlooked.

Overall, the landscape proposals create a coherent and biodiversity-supportive green infrastructure within the development. The use of native and pollinator-friendly planting, SuDS features, wildflower areas, and native hedgerows will collectively enhance ecological value, improve habitat diversity, and contribute positively to the overall ecological function of the site post-construction.



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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

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

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.

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 squares (ITM) – G63 & G63D.
- 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 www.osi.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 1st November 2024, 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/>

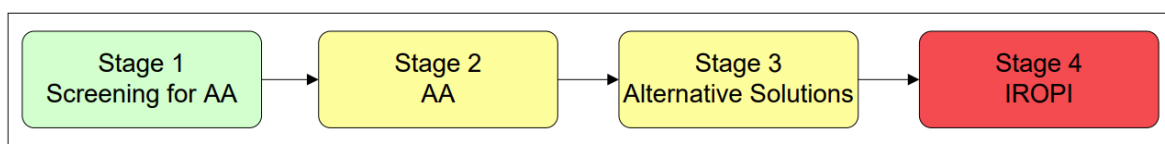
⁶ Smith, G.F., O'Donoghue, P., O'Hara, K. & Delaney, E. (2011) Best Practice Guidance for Habitat Survey and Mapping. The Heritage Council Church Lane, Kilkenny, Ireland.

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 Bearn 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 (Corinne, 2018).

A review of species records on the National Biodiversity Data Centre Ireland (NBDC) website shows records indicating the presence of protected mammals: West European Hedgehog (*Erinaceus europaeus*), Pine Marten (*Martes martes*), Irish Stoat (*Mustela erminea subsp. hibernica*), Irish Hare (*Lepus timidus subsp. hibernicus*), Eurasian Pygmy Shrew (*Sorex minutus*), and Eurasian Badger (*Meles meles*) within the 2km polygons (G63C & G63D) surrounding the site.

With respect to regional hydrology, the proposed development is within the Sligo Bay WFD Catchment, the WFD sub-catchment Carrowgobaddagh_SC_010 and the Knappagh (Sligo)_010 WFD River sub basin.

There are no watercourses within the site boundary. The nearest watercourse, Killaspugbrone Stream (EPA Code: 35K44) is located approximately 585m east of the proposed development. This watercourse has direct connectivity with Cummeen strand/Drumcliff Bay SAC [000627] and Cummeen Strand SPA [004035]. The Killaspugbrone Stream was classified as having 'Good' status under the WFD River Waterbody Status 2019-2024. The WFD River Waterbody Risk status is currently under review.

The proposed development site is located within the Drumcliff - Strandhill groundwater catchment. This groundwater body has been classified as having 'Good' status under the Ground Waterbody WFD Status 2019-2024 and 'Not at risk' as per the WFD risk score.

The aquifer in the region here is a Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones with high groundwater vulnerability. The underlying bedrock is dark fine limestone & calcareous shale. The soils are brown earth, well drained mineral soils.

4.2 Field Survey

Walkover habitat surveys were carried out on 1st November 2024, and during breeding bird surveys, to assess habitat types across seasons and identify any changes in land use or vegetation structure. The site comprises two adjoining fields located along Burmah Road, containing a mix of improved grassland, disturbed patches, ornamental planting, scrub, and some built features.

During the November 2024 survey, both fields were being actively grazed by horses. The sward across much of the site was very short, and there was widespread poaching, especially near gateways and around the existing agricultural sheds. Bare ground and compacted soils were evident in these heavily used areas. By the time of the second visit in June 2025, grazing had ceased. This allowed vegetation to recover, and by summer the site supported a taller and more varied sward. The majority of the grassland had developed a dense grassy cover, particularly in the main sections of both fields, while more open and disturbed patches persisted near the entrance, along boundaries, and around the sheds.

The dominant habitat across both fields is **GA1 – Improved Agricultural Grassland** (Plate 4.1), comprising species such as Perennial Rye-grass (*Lolium perenne*), Meadow-grasses (*Poa* spp.), and Yorkshire-fog (*Holcus lanatus*), with some White Clover (*Trifolium repens*), Red Clover (*T. pratense*), Meadow Buttercup (*Ranunculus acris*), and Ribwort Plantain (*Plantago lanceolata*). This sward composition reflects the site's agricultural use and past grazing management.

A patch of disturbed or early successional vegetation were identified and classified as **ED3 – Recolonising Bare Ground**. This habitat was found in poached or compacted areas near field entrances, boundaries, and the agricultural buildings. Some patches supported a relatively species-rich mix typical of transitional swards, including Pineappleweed (*Matricaria discoidea*), Selfheal (*Prunella vulgaris*), Lesser Trefoil (*Trifolium dubium*), Red Bartsia (*Odontites vernus*), Oxeye Daisy (*Leucanthemum vulgare*), and both red and white clovers (Plate 4.2).

A hedgerow runs along the southern boundary of the site, adjacent to Burmah Road (Plate 4.3), and was classified as **WL1 - Hedgerow**. This feature includes a variety of non-native shrub species such as Akeake (*Olearia traversiorum*), New Zealand Holly (*Olearia macrodonta*), Fuchsia (*Fuchsia magellanica*), Pheasant Berry (*Leycesteria formosa*), Barberry (*Berberis* sp.), and *Elaeagnus* sp. Native species recorded within the hedgerow include Bramble (*Rubus fruticosus* agg.), Dog Rose (*Rosa canina*) and Ivy (*Hedera helix*). None of the non-native species present are listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011).

A linear scrubby field boundary bisects the two fields and was classified as **WL1 – Hedgerow** (Plate 4.4). This feature is dominated by Bramble, with scattered Dog Rose and Hawthorn (*Crataegus monogyna*), and forms a natural division between the two fields. Additional patches of **WS1 – Scrub** were recorded around the agricultural sheds and along the hedgerow in the southern boundary encroaching into the grassland (Plate 4.5).

The existing agricultural buildings in the southern part of the site fall under **BL3 – Buildings and Artificial Surfaces**. These include brick-built sheds with galvanised metal roofing and an adjacent shipping container (Plate 4.6), along with surrounding hardstanding and compacted ground.

No habitats listed under Annex I of the EU Habitats Directive were recorded within or immediately adjacent to the site during either of the survey visits. No evidence of Annex II protected species associated with Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC or Ballysadare Bay SAC or were recorded within or adjacent to the site boundary.

The site which is dominated by agricultural grassland does not provide suitable habitat for any of the Annex II species associated with Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC or Ballysadare Bay SAC. There are no watercourses within the proposed development site. The optimal habitat type for the *Vertigo angustior* (Narrow-mouthed Whorl Snail) as described in the Conservation Objectives Document (NPWS 2013) is defined as fixed dune and species-rich grassland dominated with a vegetation height of 10-30cm. No dune habitat was present within the site. The other QI species of the above European Sites are aquatic/ marine and as such the terrestrial nature of the site doesn't provide suitable supporting habitat for Sea Lamprey (*Petromyzon marinus*), River Lamprey (*Lampetra fluviatilis*), and Harbour Seal (*Phoca vitulina*).



Plate 4.1: GA1 habitat shown in November 2024 and June 2025



Plate 4.2: ED3 habitat shown in November 2024 and June 2025



Plate 4.3: Hedgerow with encroaching scrub along southern boundary

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Plate 4.4: Linear scrub hedgerow forming boundary of two fields



Plate 4.5: Scrub around sheds



Plate 4.6: BL3 habitat

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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.

As shown in Table 5.1 below, a functional pathway exists between Ballysadare Bay SAC [000622], Cummeen Strand/ Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129] and Cummeen Strand SPA [004035] 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.

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. 395m west	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 watercourse (Killaspugbrone, EPA code: 35K44) is located c.585m east of the Site. No potential for indirect effects on the SAC via surface water pathways was identified. The Site is located within the same WFD Groundwater body, Drumcliff-Strandhill, as the SAC. During the construction and operation phases of the Proposed Development there is potential for percolation of pollutants to groundwater. Therefore, taking a	There will be no direct effects on this European Site as the proposed development is located entirely outside of and > 300m from the SAC. There will be no direct loss of any Annex I habitat or supporting habitat for Annex II species associated with this SAC. During construction, there is potential for accidental release of pollutants, hydrocarbons, or silt-laden runoff that could percolate to groundwater. During operation, foul and surface water will discharge to existing public networks; however, due to the inclusion of attenuation, flow control,	A potential hydrological connection exists between the site and the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC via groundwater pathways within the shared WFD groundwater body. Potential indirect effects on water quality and aquatic qualifying interests require further assessment to determine if significant effects can 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>)		precautionary approach, a potential pathway for likely significant effects on the SAC due to deterioration of water quality via groundwater pathways, was identified.	and pollution prevention measures, the likelihood of impacts on water quality is low.	
Ballysadare Bay SAC [000622] c. 995m 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 water courses within the proposed development site boundary. The nearest watercourse (Killaspugbrone, EPA code: 35K44) is located c.585m east of the Site. No potential for indirect effects on the SAC via surface water pathways was identified. The Site is located within the same WFD Groundwater body, Drumcliff-Strandhill, as the SAC. During the construction and operation phases of the Proposed Development there is potential for percolation of pollutants to groundwater. Therefore, taking a precautionary approach, a potential pathway for likely significant effects on the SAC due to deterioration of water	There will be no direct effects on this European Site as the proposed development is located entirely outside of and 995 m from the SAC. There will be no direct loss of any Annex I habitat or supporting habitat for Annex II species associated with this SAC. During construction, there is potential for accidental release of pollutants, hydrocarbons, or silt-laden runoff that could percolate to groundwater. During operation, foul and surface water will discharge to existing public networks; however, due to the inclusion of attenuation, flow control, and pollution prevention measures, the likelihood of impacts on water quality is low.	A potential hydrological connection exists between the site and the Ballysadare Bay SAC via groundwater pathways within the shared WFD groundwater body. 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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			quality via groundwater pathways, was identified.		
Lough Gill SAC [001976] c. 7.7km 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	No hydrological connectivity between the Site and the SAC was identified. The SAC is located within a separate WFD sub-catchment, (Bonet_SC_030) to Site (Carrowgobbadagh_SC_010). The SAC is located with a separate WFD Groundwater body (Carrowmore East & Dromahair) to the Site (Drumcliff-Strandhill). 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.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and 7.7 km from the SAC. The site does not contain or adjoin any suitable habitat for the Qualifying Interests of this SAC. No hydrological connection exists, and the development lies within a separate WFD surface and groundwater catchment. Consequently, there is no potential for direct or indirect impacts on the SAC arising from construction or operation of the proposed development.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Lough Gill SAC can therefore be ruled out.
Union Wood SAC [000638]	Habitats: [91A0] Old Oak	To maintain or restore the favourable conservation	The Site is located outside the boundary of this SAC and there	There will be no direct effects on this European Site as the	No potential pathways for indirect or

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c. 9.5km south east	Woodlands	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	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.	proposed development is located entirely outside of and approximately 9.5 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.	cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Union Wood SAC can therefore be ruled out.
Knockalongy and Knockachree Cliffs SAC [001669] c. 11km south west	Species: [1421] Killarney Fern (<i>Trichomanes speciosum</i>)	To maintain or restore the favourable conservation condition of habitats and species designated within Knockalongy and Knockachree Cliffs 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 species for which the SAC is designated is non-mobile in nature.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 11 km from the SAC. The site does not contain suitable habitat for <i>Trichomanes speciosum</i> (Killarney Fern), and there is no hydrological or other ecological connection to the SAC. Therefore, there is no potential for direct, indirect, or secondary impacts arising from the proposed development.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Knockalongy and Knockachree Cliffs SAC can therefore be ruled out.

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		sites/conservation_objectives/CO001669.pdf			
Streedagh Point Dunes SAC [001680] c. 13.7km north	Habitats: [1140] Tidal Mudflats and Sandflats [1220] Perennial Vegetation of Stony Banks [1330] Atlantic Salt Meadows [1410] Mediterranean Salt Meadows [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes)* Species: [1014] Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>)	To maintain or restore the favourable conservation condition of habitats and species designated within Streedagh Point Dunes 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/CO001680.pdf	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 sub-catchment, (Grange[Sligo]_SC_010) to Site (Carrowgobbadagh_SC_010). The SAC is located with a separate WFD Groundwater body (Grange West) to the Site (Drumcliff-Strandhill). 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	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 13.7 km from the SAC. The site does not support or adjoin any habitat suitable for the Qualifying Interests of this SAC, and there is no hydrological or other ecological connection between the site and the SAC. Consequently, no potential for direct, indirect, or secondary impacts arises from 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 Streedagh Point Dunes SAC can therefore be ruled out.

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			was identified.		
Unshin River SAC [001898] c. 11.2km south west	Habitats: [3260] Floating River Vegetation [6210] Orchid-rich Calcareous Grassland* [6410] Molinia Meadows [91E0] Alluvial Forests* Species: [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 Unshin River 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/CO001898.pdf	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 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.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 11.2 km from the SAC. The site does not contain or adjoin suitable aquatic or riparian habitat for the 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.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Unshin River SAC can therefore be ruled out.

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Ox Mountains Bogs SAC [002006] c. 13.6km south west	Habitats: [3110] Oligotrophic Waters containing very few minerals [3160] Dystrophic Lakes [4010] Wet Heath [4030] Dry Heath [7130] Blanket Bogs (Active)* [7140] Transition Mires [7150] Rhynchosporion Vegetation Species: [1013] Geyer's Whorl Snail (<i>Vertigo geyeri</i>) [1528] Marsh Saxifrage (<i>Saxifraga hirculus</i>)	To maintain or restore the favourable conservation condition of habitats and species designated within Ox Mountains 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/CO002006.pdf	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 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.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 13.6 km from the SAC. The site does not support any of the bog or wetland habitats for which the SAC is designated and lies within a separate surface water and groundwater catchment. As such, there is no hydrological or ecological connection between the site and the SAC, and 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 Ox Mountains Bogs SAC can therefore be ruled out.

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Ben Bulbin, Gleniff and Glenade Complex SAC [000623] c. 11.4km north east	Habitats: [3260] Floating River Vegetation [4010] Wet Heath [4030] Dry Heath [4060] Alpine and Subalpine Heaths [5130] Juniper Scrub [6210] Orchid-rich 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>)	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 targets. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000623.pdf	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 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.	here will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 11.4 km from the SAC. The site does not contain suitable habitats for the Qualifying Interests of this SAC, which include upland, 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.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Ben Bulbin, Gleniff and Glenade Complex SAC can therefore be ruled out.
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Special Protection Areas (SPAs)					
Cummeen Strand SPA [004035] c. 829m north east	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] 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 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	There are no open drains or water courses within the Site boundary. The nearest watercourse (Killaspugbrone, EPA code: 35K44) is located c.585m east of the Site. No potential for indirect effects on the SPA via surface water pathways was identified. The Site is located within the same WFD Groundwater body, Drumcliff-Strandhill, as the SPA. During the construction and operation phases of the Proposed Development there is potential for percolation of pollutants to groundwater. Therefore, taking a precautionary approach, a potential pathway for likely significant effects on the SPA due to deterioration of water quality via groundwater pathways, was identified.	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 829 m from the SPA. The site itself does not provide significant suitable habitat for the Special Conservation Interest (SCI) bird species; however, given its proximity to the SPA and taking a precautionary approach, there is potential for ex-situ disturbance or displacement of SCI species that may occasionally forage within the wider area. During construction, there is potential for accidental release of pollutants, hydrocarbons, or silt-laden runoff that could percolate to groundwater.	A potential hydrological connection exists between the site and the Cummeen Strand SPA via groundwater pathways within the shared WFD groundwater body. In addition, given the proximity of the site to the SPA, a potential for indirect effects on SCI species through disturbance or displacement cannot be ruled out at screening stage. These potential effects require further assessment to determine if significant effects can be excluded.

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			The site does not provide significant suitable habitat for any of the SCI species, however, given its proximity to the SPA and taking a precautionary approach, there is a potential for ex situ disturbance and displacement of SCI species which may use the site on occasion for foraging.	During operation, foul and surface water will discharge to existing public networks; however, due to the inclusion of attenuation, flow control, and pollution prevention measures, the likelihood of impacts on water quality is low.	
Ballysadare Bay SPA [004129] c. 1km 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 water courses within the Site boundary. The nearest watercourse (Killaspugbrone, EPA code: 35K44) is located c.585m east of the Site. No potential for indirect effects on the SPA via surface water pathways was identified. The Site is located within the same WFD Groundwater body, Drumcliff-Strandhill, as the SPA. During the construction and operation phases of the Proposed Development there is potential for percolation of pollutants to groundwater. Therefore, taking a precautionary approach, a potential pathway for likely	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 1 km from the SPA. The site does not provide significant suitable habitat for the Special Conservation Interest (SCI) bird species; however, given its proximity to the SPA and taking a precautionary approach, there is potential for ex-situ disturbance or displacement of SCI species that may occasionally forage within the wider area. During construction, there is	A potential hydrological connection exists between the site and Ballysadare Bay SPA via groundwater pathways within the shared WFD groundwater body. In addition, due to the site's proximity to the SPA, potential indirect effects on SCI species through disturbance or displacement cannot be ruled out at screening stage. These potential effects require further

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			significant effects on the SPA due to deterioration of water quality via groundwater pathways, was identified. The site does not provide significant suitable habitat for any of the SCI species, however, given its proximity to the SPA and taking a precautionary approach, there is a potential for ex situ disturbance and displacement of SCI species which may use the site on occasion for foraging.	potential for accidental release of pollutants, hydrocarbons, or silt-laden runoff that could percolate to groundwater. During operation, foul and surface water will discharge to existing public networks; however, due to the inclusion of attenuation, flow control, and pollution prevention measures, the likelihood of impacts on water quality is low.	assessment to determine if significant effects can be excluded.
Drumcliff Bay SPA [004013] c. 5.4km north	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. Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-	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 5.4km	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 5.4 km from the SPA. The site does not provide suitable or supporting habitat for the Special Conservation Interest (SCI) bird species associated with this SPA. No hydrological connection exists, and the development lies within a separate surface	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 be ruled out.

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		sites/conservation objectives/CO004013.pdf	between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species.	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.	
Aughris Head SPA [004133] c. 11km west	Kittiwake (<i>Rissa tridactyla</i>) [A188]	To maintain or restore the favourable conservation condition of habitats and species designated within the Aughris Head 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/CO004133.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 11km 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 11 km from the SPA. The site does not support suitable coastal or cliff habitats for <i>Rissa tridactyla</i> (Kittiwake), the Special Conservation Interest of this SPA. No hydrological or ecological connection exists between the proposed development and the SPA; therefore, there is no potential for direct, indirect, or secondary impacts during either the construction or operational phases.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Aughris Head SPA can therefore be ruled out.

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Ardboline Island and Horse Island SPA [004135] c. 9.4km north west	Cormorant (<i>Phalacrocorax carbo</i>) [A017] Barnacle Goose (<i>Branta leucopsis</i>) [A045]	To maintain or restore the favourable conservation condition of habitats and species designated within the Ardboline Island and Horse Island 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/CO004135.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 9.4km 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 9.4 km from the SPA. The site does not provide suitable coastal or island habitats for the Special Conservation Interest (SCI) bird species (<i>Phalacrocorax carbo</i> and <i>Branta leucopsis</i>). No hydrological or ecological connection exists between the proposed development and the SPA; therefore, there is no potential for direct, indirect, or secondary impacts during either the construction or operational phases.	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Ardboline Island and Horse Island SPA can therefore be ruled out
Sligo/Leitrim Uplands SPA [004187] c. 11.2km 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.	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 11.2 km from the SPA. The site does not support suitable upland or cliff habitats for the Special Conservation	No potential pathways for indirect or cumulative effects were identified. Significant effects on the Qualifying Interests or conservation objectives of Sligo/Leitrim Uplands

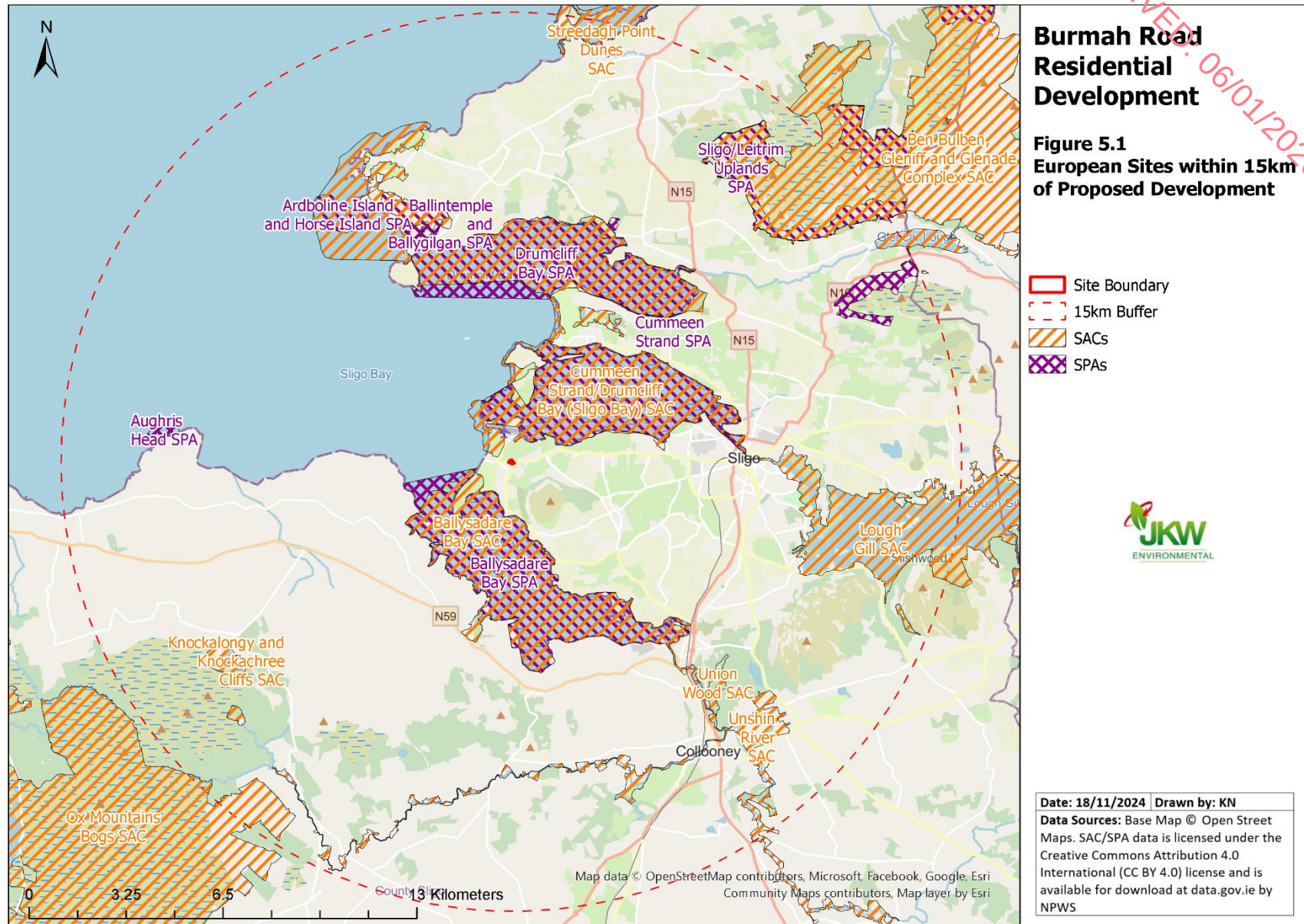
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		Full details of the conservation objectives can be found at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004187.pdf	The Site does not provide significant suitable habitat for any of the SCI species. Given the absence of significant habitat and the distance of 11.2km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species.	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; therefore, there is no potential for direct, indirect, or secondary effects during either the construction or operational phases.	SPA can therefore be ruled out.
Ballintemple and Ballygilgan SPA [004234] c. 7.8km 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 7.8km between the Site and the SPA, there is no potential for significant effects on this SPA	There will be no direct effects on this European Site as the proposed development is located entirely outside of and approximately 7.8 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	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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			due to disturbance of SCI species.	impacts arises during either the construction or operational phases of the proposed development.	
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5.2 Description of Natura 2000 Sites

Ballysadare Bay SAC:

Ballysadare Bay SAC is a coastal site extending approximately 10 kilometers west from Ballysadare town in County Sligo, Ireland. It forms part of the larger Sligo Bay complex and is characterized by its estuarine channel, which is shaped by the Ballysadare River as it flows through the bay to meet the sea near Strandhill. The underlying geology includes sedimentary rocks such as limestone, sandstone, and shale, which manifest as low cliffs and bedrock shores. The area is dominated by extensive intertidal mudflats and sandflats, covering about 1,500 hectares, which are rich in biodiversity. These flats support vital plant species like eelgrass and tasselweed, along with diverse invertebrates that form the food base for numerous bird species.

The site's habitats are of European conservation importance, including estuaries, tidal mudflats, and a dynamic sand dune system at Strandhill. These dunes feature embryonic shifting dunes, white dunes, fixed grey dunes, and humid dune slacks, with distinct plant communities adapted to each habitat type. The fixed dunes are particularly notable for their biodiversity, supporting a range of flora, including mosses, lichens, and species such as bee orchid and kidney vetch. The salt marshes around the bay also contribute to its ecological diversity, supporting species like sea rush and creeping bent, with unique formations like the Abbeytown salt marsh on quarry waste.

Ballysadare Bay is home to two species listed under Annex II of the EU Habitats Directive: the common seal and the narrow-mouthed whorl snail, the latter found in dune slacks at Strandhill. The bay is also important for waterfowl, hosting internationally significant numbers of brent geese and nationally important populations of other species such as redshank, grey plover, and bar-tailed godwit. The presence of Annex I bird species, including bar-tailed godwit and golden plover, further enhances its ornithological value.

While the bay has limited use for fishing and aquaculture, its dune systems and salt marshes face pressures from grazing, agricultural improvement, and development.

Cummeen Strand/ Drumcliff Bay SAC:

Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is a large coastal site extending from Cullamore to Killaspug and encompassing two significant shallow bays, Drumcliff Bay and Sligo Harbour. It includes a variety of habitats such as sand dunes, grasslands, salt marshes, fen, freshwater marshes, rocky sea cliffs, and several small islands. The site is notable for its diverse geological composition, including Carboniferous limestone and acidic rocks, with fossil-rich strata exposed at Serpent Rock.

This SAC is designated for several habitats and species listed under Annex I and II of the EU Habitats Directive. Key habitats include estuaries, tidal mudflats, shifting dunes, fixed dunes, juniper scrub, orchid-rich calcareous grasslands, and petrifying springs with tufa formations. The dunes and intertidal flats, particularly in Drumcliff Bay and Sligo Harbour, support an array of species, including invertebrates like lugworms, cockles, and mussels, as well as seagrass beds of *Zostera noltii* and *Z. angustifolia*.

The site is ecologically rich, hosting Annex II species such as common seals, sea lamprey, river lamprey, the marsh fritillary butterfly, and the rare snail *Vertigo angustior*. The presence of petrifying springs along clay sea cliffs in Sligo Harbour adds further conservation importance. These springs host bryophytes typical of the Cratoneurion, a feature of European significance.

Cummeen Strand and Drumcliff Bay are crucial for birdlife, supporting large populations of waterfowl and seabirds, including barnacle geese, choughs, golden plovers, and bar-tailed godwits, all of which are listed under Annex I of the Birds Directive. The fields at Lissadell and Ballintemple provide vital feeding grounds for barnacle geese, while nearby islands host nationally important cormorant colonies and other seabirds such as herring gulls and great black-backed gulls. The site's birdlife benefits from the diverse habitats and feeding opportunities provided by the intertidal flats and surrounding grasslands.

The site's conservation significance lies in its diverse range of high-quality habitats, its support for numerous protected species, and its role as a vital area for waterfowl and seabirds. The dynamic nature of its habitats, including dune systems and petrifying springs, underscores the importance of protecting this site against pressures from erosion, under-grazing, and other anthropogenic impacts.

Ballysadare Bay SPA:

Ballysadare Bay SPA is situated in County Sligo, extending approximately 10 kilometers westward from the town of Ballysadare. As the southernmost of three inlets forming the eastern section of the larger Sligo Bay complex, it is characterized by an estuarine channel fed by the Ballysadare River, which flows into the sea near the Strandhill Dunes. The site is geologically rich, underlain by sedimentary rocks including limestone, sandstone, and shale, visible as low cliffs and bedrock shores at various locations.

The SPA is notable for its extensive intertidal sand and mudflats, which support significant populations of macroinvertebrates such as polychaete worms and bivalves. These invertebrates serve as vital food sources for wintering waterfowl. The intertidal flats also host vascular plants like eelgrass and beaked tasselweed, which provide sustenance for herbivorous bird species. Additionally, well-developed salt marshes around the bay offer essential roosting sites at high tide, while sandy beaches along the Strandhill peninsula are also utilized for roosting.

The site is of special conservation interest under the EU Birds Directive for species such as Light-bellied Brent Goose, Grey Plover, Dunlin, Bar-tailed Godwit, and Redshank. It also supports a range of other waterfowl species, including Whooper Swan, Shelduck, Wigeon, and Golden Plover, as well as gulls and wading birds. The population of Light-bellied Brent Goose is of international importance, while those of Grey Plover, Dunlin, Bar-tailed Godwit, and Redshank are of national significance. The presence of species like Bar-tailed Godwit, Golden Plover, and Whooper Swan, listed under Annex I of the Birds Directive, further highlights the ornithological importance of the site.

Cummeen Strand SPA:

Cummeen Strand SPA is a shallow bay located within the Sligo Bay complex, stretching westward from Sligo Town to Coney Island. Positioned between Drumcliff Bay to the north and Ballysadare Bay to the south, it is fed by the Garavogue River, which forms a permanent channel through the bay. The site features extensive sand and mudflats exposed at low tide, which are vital habitats supporting a rich macro-invertebrate community. This invertebrate fauna, including species such as lugworm, ragworm, cockles, and mussels, forms the primary food source for wintering waterfowl. The presence of eelgrass beds, including species *Zostera noltii* and *Z. angustifolia*, is of particular ecological importance as they provide a valuable food resource for herbivorous wildfowl.

The bay is fringed by salt marshes that serve as roosting sites during high tide, while sand dunes and a shingle spit further contribute to its habitat diversity. Cummeen Strand is protected as a Special Protection Area under the EU Birds Directive and is recognized for its conservation value for species

such as Light-bellied Brent Goose, Oystercatcher, and Redshank. Wetland and intertidal habitats within the SPA also receive attention due to their significance for supporting these bird populations.

The bay supports a range of waterfowl during the winter months, including an internationally significant population of Light-bellied Brent Goose and nationally important numbers of Oystercatcher and Redshank. Other species regularly present include Golden Plover, Lapwing, Dunlin, and Bar-tailed Godwit, with occasional appearances by Whooper Swans. Notably, Golden Plover and Bar-tailed Godwit are listed under Annex I of the EU Birds Directive, highlighting the site's importance for species of conservation concern.

5.3 Conclusions of Screening for Appropriate Assessment

In accordance with Article 6(3) of the Habitats Directive, this AA Screening report has examined the details of the Proposed Development and the relevant Natura 2000 sites.

The Proposed Development is not associated with or necessary for the management of any Natura 2000 site.

There is no predicted direct loss or destruction of habitat associated with a Natura 2000 site, as there is no overlap between those and the Site.

At its closest point, the Site is situated approximately c. 395m from Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC, c. 829m from Cummeen Strand SPA, c. 995m from Ballysadare Bay SAC and c. 1km from Ballysadare Bay SPA. Additionally, the Application Site is hydrologically connected with these two Natura 2000 sites via groundwater. This provides a pathway for adverse water quality effects to reach these Natura 2000 sites during the construction or operational phase of the Proposed Development through an increase in suspended sediments or accidental pollution events. Additionally, potential disturbance effects associated with construction could not be ruled out at this stage.

Therefore, based on the best scientific information, this report has provided information to determine that LSEs cannot be ruled out for the following Natura 2000 sites:

- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (000627)
- Cummeen Strand SPA (004035)
- Ballysadare Bay SAC (000622)
- Ballysadare Bay SPA (004129)

In line with the recommendations of guidance and case law, it is considered that the Proposed Development must progress to Stage 2 of the AA process, the preparation of a Natura Impact Statement, to determine if the proposed project will adversely affect the integrity of the qualifying interests of Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC, Cummeen Strand SPA, Ballysadare Bay SAC and Ballysadare Bay SPA.

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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 Ballysadare Bay SAC [000622], Cummeen Strand/ Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129] and Cummeen Strand SPA [004035]. 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 Ballysadare Bay SAC [000622], Cummeen Strand/ Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129] and Cummeen Strand SPA [004035].

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 proposed development, either alone or in combination with other plans or projects, on the integrity of Ballysadare Bay SAC [000622], Cummeen Strand/Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129], and Cummeen Strand SPA [004035], with reference to the conservation objectives, structure, and function of these sites. The assessment focuses on demonstrating, with supporting evidence, that the proposed development, if implemented as designed and with appropriate mitigation, will not result in adverse effects on the integrity of any of these Natura 2000 sites.

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 33 residential units along with associated infrastructure, including vehicular access, internal roads and footpaths, service connections, landscaping, and all ancillary works.

The primary potential pathway for effects on European sites relates to the risk of deterioration in water quality via groundwater connections. During the construction phase, activities such as site clearance, excavation, material storage, and the use of machinery and concrete products could give rise to accidental releases of hydrocarbons, cementitious materials, or suspended solids. If such pollutants were to infiltrate the underlying groundwater, there is potential for indirect effects on groundwater-dependent habitats and species, including *Vertigo angustior* (Narrow-mouthed Whorl Snail) within Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC.

In addition, there is a potential, albeit limited, for temporary disturbance or displacement of Special Conservation Interest (SCI) bird species associated with Ballysadare Bay SPA and Cummeen Strand SPA, where such species may occasionally use the site or surrounding area for foraging..

6.1.2 Conservation Objectives of the Natura 2000 sites

The conservation objectives for the Ballysadare Bay SAC [000622], Cummeen Strand/ Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129] and Cummeen Strand SPA [004035], 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 Ballysadare Bay SAC, Cummeen Strand/ Drumcliff Bay SAC, Ballysadare Bay SPA, and Cummeen Strand SPA can be broadly summarised as:

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

6.1.3 Site Specific Pressures and Threats

As per the Natura 2000 Data Form, for the Ballysadare Bay SAC, Cummeen Strand/ Drumcliff Bay SAC, Ballysadare Bay SPA, and Cummeen Strand SPA, 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 Ballysadare Bay SAC

Rank	Negative Threats and Pressures		Inside/Outside
High	A04.03	Abandonment of Pastoral systems, lack of grazing	Inside
Medium	E01.02	Discontinuous urbanisation	Outside
Medium	F02	Fishing and harvesting aquatic resources	Inside
Medium	G01.02	Walking, horseriding, and non-motorised vehicles	Inside
Medium	G05.01	Trampling, overuse	Inside
Medium	K01.01	Erosion	Inside
Low	F01.03	Bottom culture	Inside
Low	G02.01	Golf course	Both
Low	I01	Invasive non-native species	Inside
Low	J02.01.02	Reclamation of land from sea, estuary or marsh	Inside
Low	J02.12.01	Sea defense or coast protection works, tidal barrages	Inside

Table 6.2: Site-Specific Pressures and Threats for Cummeen Strand/ Drumcliff Bay SAC

Rank	Negative Threats and Pressures		Inside/Outside
H	F01.01	intensive fish farming, intensification	Inside
L	E03.03	disposal of inert materials	Inside
L	G02.08	Camping and caravans	Inside
L	G05.01	Trampling, overuse,	Inside
L	J01.01	burning down	Inside
L	J02.11.01	Dumping, depositing of dredged deposits	Inside
L	J02.12.01	sea defence or coast protection works, tidal barrages	Inside
M	A02.01	agricultural intensification	Inside
M	D03	shipping lanes, ports, marine constructions	Inside
M	D03.01	port areas	Inside
M	E01.03	Dispersed habitation	Inside
M	G01.02	walking, horse-riding, and non-motorised vehicles	Inside
M	G01.03.02	off-road motorized driving	Inside
M	G02.01	Golf course	Inside

M	101	invasive non-native species	Inside
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Table 6.3: Site-Specific Pressures and Threats for Ballysadare Bay SPA

Rank	Negative Threats and Pressures		Inside/Outside
Medium	F03.01	Hunting	Inside
Medium	A08	Fertilisation	Outside
Medium	E01.01	Continuous urbanisation	Outside
Low	F01	Marine and freshwater aquaculture	Inside

Table 6.4: Site-Specific Pressures and Threats for Cummeen Strand SPA

Rank	Negative Threats and Pressures		Inside/Outside
High	J02.01.02	Reclamation of land from sea, estuary, or marsh	Inside
High	E02	Industrial or commercial areas	Inside
High	D03.02	Shipping lanes	Inside
High	F01	Marine and freshwater aquaculture	Inside
High	E02	Industrial or commercial areas	Outside
Medium	H	Pollution	Inside
Medium	E01	Urbanised areas, human habitation	Outside
Medium	D01.02	Roads, motorways	Outside
Medium	A08	Fertilisation	Outside
Low	F02.03	Biological resource other than agriculture and forestry-bottom culture	Inside

6.1.4 How the Project will affect key species and habitats.

The key qualifying interests, habitats and species, likely to be affected as a result of the proposed development are as follows:

Cummeen Strand/Drumcliff Bay SAC:

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

The proposed development does not support any Annex I habitats or Annex II species of qualifying interest, nor does it contain or adjoin suitable habitat for *Vertigo angustior* (Narrow-mouthed Whorl Snail). However, *Vertigo angustior* is listed as a qualifying interest for Cummeen Strand/Drumcliff Bay SAC, and there are known records of the species within the SAC, as documented in the relevant NPWS Conservation Objectives (Map 7). In addition, National Biodiversity Data Centre (NBDC) records indicate that *Vertigo angustior* has previously been recorded within 1 km of the proposed development site, including multiple records from 1992, 1997, and 2006 within grid square G6036, approximately 250 m to the northwest.

The optimal habitat for *Vertigo angustior* is described in the NPWS Conservation Objectives as species-rich fixed dune grassland dominated by red fescue (*Festuca rubra*), with sparse marram (*Ammophila arenaria*) and associated low-growing herbaceous species on damp, friable soils with an open thatch structure. These conditions are absent from the proposed development site, which comprises semi-improved agricultural grassland (GA1) with transitional disturbed swards (ED3) and a hedgerow of

ornamental shrub species (WS3). No suitable habitat for the species was identified during multidisciplinary field surveys.

While no direct or supporting habitat for *Vertigo angustior* occurs within or adjacent to the proposed development, a precautionary approach has been applied due to its known distribution in the wider area and the shared WFD groundwater body (Drumcliff–Strandhill) between the site and the SAC. During construction, infiltration of pollutants such as hydrocarbons, cement-based materials, or silt-laden runoff could theoretically affect groundwater quality, which could in turn indirectly affect suitable habitats within the SAC.

However, the proposed development is located approximately 395 m east of the SAC, with no open drains or surface water connections between the site and the designated area. Site investigations and the Drainage Design Report (CST Group, 2025) confirm that the underlying soils are clay-based with poor infiltration capacity, providing natural attenuation of any infiltrating pollutants. Furthermore, the construction-phase drainage design includes silt and hydrocarbon management, attenuation, and flow control measures, which will minimise the potential for contamination to reach the groundwater system. Consequently, the potential for significant indirect effects on *Vertigo angustior* or its supporting habitat within Cummeen Strand/Drumcliff Bay SAC is considered low.

Petrifying springs [7220], also listed as a qualifying interest for this SAC, are mapped by NPWS within the Rosses Point peninsula, approximately 5 km north of the proposed development. These springs occur within a different WFD groundwater body (Rosses Point) and are hydrogeologically isolated from the Drumcliff–Strandhill groundwater unit in which the proposed development site lies. There is no plausible hydraulic connection between the site and the petrifying spring systems. As such, this habitat is not considered at risk of any impact arising from the proposed development.

The remaining qualifying interests of the SAC are sufficiently distant, not groundwater-dependent, or lack any hydrological or functional connectivity with the proposed development. Therefore, they are not considered at risk of impact.

Ballysadare Bay SAC:

Humid dune slacks [2190]

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

The proposed development does not support any Annex I habitats or Annex II species of qualifying interest, nor does it contain or adjoin suitable habitat for *Vertigo angustior* or Humid dune slacks [2190]. However, both features are listed as qualifying interests of Ballysadare Bay SAC and are present within the coastal dune systems located over 1 km southwest of the proposed development.

Vertigo angustior typically occurs in humid dune slack habitats and damp, species-rich dune grasslands influenced by stable groundwater conditions. These habitats are groundwater-dependent, and their ecological functioning relies on maintaining water levels and quality. The proposed development lies within the same WFD groundwater body (Drumcliff–Strandhill) as Ballysadare Bay SAC, indicating potential hydrogeological connectivity between the site and the coastal systems that support these qualifying interests.

While no direct surface water pathway exists, construction-phase activities such as excavation, use of machinery, and handling of hydrocarbons and cement-based materials have the potential to result in

temporary, localised infiltration of pollutants or suspended solids. In the absence of appropriate mitigation, such pollutants could theoretically percolate through soils and enter the groundwater, indirectly affecting the quality of water supporting sensitive dune slack habitats and *Vertigo angustior* populations within the SAC.

However, the site is located over 1 km from the SAC boundary, and the intervening subsoils are predominantly clay-based, with poor infiltration capacity confirmed through the Drainage Design Report (CST Group, 2025). This provides natural attenuation of potential contaminants. The proposed surface water management system also incorporates attenuation, flow control, and pollution prevention measures that will prevent any deterioration of groundwater quality. Consequently, the likelihood of significant indirect effects on *Humid dune slacks* [2190] or *Vertigo angustior* [1014] within Ballysadare Bay SAC is considered low.

The remaining qualifying interests of the SAC (Table 5.1), including estuarine and marine habitats, are sufficiently distant, not groundwater-dependent, and/or lack hydrological or functional connectivity with the proposed development. Therefore, they are not considered at risk of any impact arising from the project.

Cummeen Strand SPA:

Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]

Oystercatcher (*Haematopus ostralegus*) [A130]

Redshank (*Tringa totanus*) [A162]

Wetland and Waterbirds [A999]

The proposed development site lies approximately 829 m east of the Cummeen Strand SPA and is entirely outside the designated boundary. The SPA supports internationally important populations of overwintering waterbirds and waders associated with the extensive intertidal flats, sandflats, and saltmarshes of Cummeen Strand.

The development site comprises semi-improved agricultural grassland (GA1) with transitional disturbed swards (ED3) and does not contain wetland or estuarine features. While the field was heavily grazed during winter 2024, vegetation has since recovered to a variable grass-dominated sward with ruderal species such as clover, dock, nettle, and pineapple weed. These habitats do not provide suitable or regularly used foraging or roosting areas for the SPA's SCI species.

A precautionary disturbance assessment was undertaken following Goodship & Furness (2022) Disturbance Distances Review: An Updated Literature Review of Disturbance Distances of Selected Bird Species (NatureScot Research Report 1283¹⁴). Indicative non-breeding-season disturbance distances for relevant species are:

- Light-bellied Brent Goose – 50 to 200 m
- Oystercatcher – 150 to 300 m
- Redshank – 200 to 300 m

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.

The proposed development lies well beyond these recommended distances, at approximately 829 m from the SPA. Given this separation, the absence of suitable habitat on or near the site, and the presence of intervening built and vegetated landscape, no behavioural disturbance, displacement, or habitat degradation of SCI species is anticipated.

The site lies within the same WFD Groundwater Body (Drumcliff–Strandhill) as the SPA; however, there are no surface-water connections, and the clay-based subsoils exhibit poor infiltration capacity, as confirmed in the Drainage Design Report (CST Group, 2025). Construction-phase controls, including attenuation, flow regulation, and hydrocarbon and sediment management, will prevent any deterioration in groundwater quality. Consequently, indirect hydrological impacts on the wetland habitats supporting the Wetland and Waterbirds [A999] assemblage are considered negligible.

Accordingly, the proposed development will not give rise to significant direct, indirect, or cumulative effects on the structure or function of Cummeen Strand SPA, or on the conservation objectives for Light-bellied Brent Goose [A046], Oystercatcher [A130], Redshank [A162], or Wetland and Waterbirds [A999].

Ballysadare Bay SPA:

Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]

Grey Plover (*Pluvialis squatarola*) [A141]

Dunlin (*Calidris alpina*) [A149]

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

Redshank (*Tringa totanus*) [A162]

Wetland and Waterbirds [A999]

The proposed development site lies approximately 1 km east of Ballysadare Bay SPA and is located entirely outside the designated boundary. The SPA supports internationally important populations of overwintering and passage waders and waterbirds associated with intertidal and coastal habitats, including extensive areas of estuary, tidal mudflats, and saltmarsh.

The proposed development site comprises semi-improved agricultural grassland (GA1) with transitional disturbed swards (ED3) and no wetland or estuarine features. While the field was heavily grazed during winter 2024, it has since recovered to a variable sward dominated by grasses and ruderal species such as clover, dock, nettle, and pineapple weed. These habitats do not provide suitable foraging or roosting opportunities for the SPA's SCI species, all of which are strongly associated with intertidal feeding grounds.

A precautionary disturbance assessment was undertaken following Goodship & Furness (2022) Disturbance Distances Review: An Updated Literature Review of Disturbance Distances of Selected Bird Species (NatureScot Research Report 1283). Indicative non-breeding-season disturbance distances for relevant species are as follows:

- Light-bellied Brent Goose – 50 to 200 m
- Grey Plover – 150 to 300 m
- Dunlin – 150 to 300 m
- Bar-tailed Godwit – 200 to 300 m

- Redshank – 200 to 300 m

The proposed development is situated approximately 1 km from the SPA, well beyond the maximum recommended disturbance distances for all species. Given this separation, the absence of suitable habitat within or adjacent to the site, and the presence of intervening built and vegetated landscape, no behavioural disturbance, displacement, or habitat degradation of SCI species is anticipated.

The site lies within the same WFD Groundwater Body (Drumcliff–Strandhill) as the SPA; however, there are no surface-water connections, and the underlying clay-based subsoils have poor infiltration capacity, as confirmed in the Drainage Design Report (CST Group, 2025). Construction-phase controls, including attenuation, flow regulation, and hydrocarbon and sediment management, will prevent any deterioration in groundwater quality. Consequently, indirect hydrological impacts on the wetland habitats supporting the Wetland and Waterbirds [A999] assemblage are considered negligible.

Accordingly, the proposed development will not give rise to significant direct, indirect, or cumulative effects on the structure or function of Ballysadare Bay SPA, or on the conservation objectives for Light-bellied Brent Goose [A046], Grey Plover [A141], Dunlin [A149], Bar-tailed Godwit [A157], Redshank [A162], or Wetland and Waterbirds [A999].

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 Natura 2000 sites has been assessed in view of their conservation objectives.

In the absence of mitigation, there is potential for indirect effects on the groundwater-dependent qualifying interests *Vertigo angustior* [1014] and Humid Dune Slacks [2190] within Ballysadare Bay SAC, and on *Vertigo angustior* [1014] within Cummeen Strand/Drumcliff Bay SAC. These effects could arise through accidental release of hydrocarbons, cementitious materials, or suspended solids during construction, leading to potential contamination or alteration of groundwater quality supporting sensitive habitats. Similarly, short-term disturbance or displacement of Special Conservation Interest (SCI) bird species associated with Ballysadare Bay SPA and Cummeen Strand SPA could occur due to construction-related noise or activity, though such effects would be temporary and localised.

However, the proposed development lies outside all Natura 2000 site boundaries, no suitable habitats occur within or adjacent to the site, and the intervening distance (395–1,000 m) provides a substantial buffer between construction activities and the designated sites. The underlying clay-based subsoils also exhibit poor infiltration capacity, providing natural attenuation of any potential pollutants.

Following implementation of the pollution prevention, drainage, and noise control measures set out in Section 6.2.7 (Mitigation Measures), the risk of any deterioration in groundwater quality or disturbance to sensitive bird species will be effectively avoided.

Accordingly, with the application of standard best-practice and mitigation measures, the proposed development will not adversely affect the integrity of Ballysadare Bay SAC, Cummeen Strand/Drumcliff Bay SAC, Ballysadare Bay SPA, or Cummeen Strand SPA, either alone or in combination with other plans or projects, in view of their conservation objectives.

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 October 2024. 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
- Draft 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 Strandhill's highly developed coastal village setting. These include applications for home renovations, extensions, refurbishments, and alterations to existing dwellings, reflecting ongoing residential improvements. Several change of use applications for commercial premises were also recorded, alongside small-scale business premises upgrades.

A notable recent application was lodged by Strandhill Golf Club, seeking permission for modifications to parts of the course layout, improvements to internal roads, expanded car parking areas, and the installation of 'Dryloo' toilet facilities to enhance the club's amenities. An Appropriate Assessment (AA) Screening was undertaken for the Golf Club proposals, which concluded that, with the implementation of standard construction-phase controls, the project would not result in significant adverse effects on any European Site, either alone or in combination with other plans or projects.

Another project of particular note is the Strandhill Public Realm Enhancement 2025. This infrastructural upgrade will result in the reconfiguration and narrowing of the Shore Road carriageway, widened and repaved footpaths, redistribution of public car parking spaces to provide 365 total spaces (including 27 accessible spaces), new street lighting and furniture, landscaping, and enhanced surfacing throughout the Shore Front and Shore Road areas. It also includes the relocation of a Protected Structure (a historic cannon) approximately 57 metres to the southwest. The aim of the project is to improve pedestrian safety, accessibility, and the overall amenity value of the seafront, while supporting sustainable tourism and local economic activity.

An Environmental Impact Assessment (EIA) Screening was carried out by Land Use Consultants Ltd for the Strandhill Public Realm Enhancement, which concluded that the proposed works do not require an EIA, as they are not likely to result in significant effects on the environment. In parallel, an Appropriate Assessment (AA) was also undertaken, which concluded that, with the implementation of

standard mitigation measures (including pollution prevention during construction and sensitive design around designated sites), the project would not result in significant adverse effects on the integrity of any European Site, either alone or in combination with other plans or projects.

Given the findings of the AA and EIA Screening for the Public Realm Enhancement, the AA Screening for the Golf Club works, the nature and scale of other permitted developments, the urban setting, and the distance to designated sites, it is concluded that there is no risk of cumulative or in-combination effects on European Sites arising from the proposed development. These projects are typical of the development pressures within Strandhill and are generally small to medium in scale, largely serviced by existing public infrastructure, and subject to standard planning and environmental assessment procedures. No significant developments involving large-scale land-use changes or high-risk construction activities were identified that would present a credible risk of cumulative impacts.

6.1.7 Mitigation Measures

The following measures are designed to ensure that no deterioration of water quality, groundwater condition, or disturbance to bird species occurs, thereby maintaining the structure and function of Ballysadare Bay SAC, Cummeen Strand/Drumcliff Bay SAC, Ballysadare Bay SPA, and Cummeen Strand SPA in accordance with their conservation objectives.

Construction Phase

Roles and Responsibilities

The main contractor will be required to designate a suitably qualified Ecological Clerk of Works (ECoW), or engage an independent ECoW, with demonstrable experience of environmental management and ecological monitoring on construction sites. The ECoW will assume responsibility for overseeing the implementation of all environmental protection measures and ensuring compliance with the NIS, CEMP, and any site-specific method statements.

The ECoW will:

- provide an environmental and ecological briefing to all site personnel prior to commencement of works;
- carry out routine inspections and audits of the site to confirm adherence to mitigation measures;
- liaise with the project manager and statutory authorities on environmental compliance; and
- have the authority to halt works in the event that activities pose a risk to the environment or to the conservation objectives of designated sites.

Prior to commencement of works, the ECoW will undertake a pre-construction environmental inspection to confirm that all pollution-control measures, storage areas, and silt-control installations are in place and functioning correctly. Works may not commence until the ECoW has certified readiness.

The ECoW will also prepare brief monthly compliance reports summarising inspections, incidents, and corrective actions. These reports will be submitted to Sligo County Council (Planning Authority) on request to demonstrate adherence to the NIS and CEMP.

In addition, the contractor will appoint an on-site Environmental Officer with responsibility for day-to-day implementation of the CEMP and mitigation measures. This individual will ensure that best

practice controls are applied consistently during construction activities, maintain records of site inspections, and act as the primary point of contact with the ECoW.

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.

Construction Environmental Management Plan (CEMP)

A site-specific Construction Environmental Management Plan (CEMP) has been prepared by Kilcawley Construction (August 2025). The CEMP sets out the procedures and controls to ensure that construction is undertaken in an environmentally responsible manner and that risks to nearby European sites are avoided.

Key mitigation measures include:

- Noise and vibration: Works will be restricted to defined working hours, with low-noise plant selected where possible and acoustic barriers deployed if required. All measures comply with BS 5228 and planning noise limits.
- Dust and air quality: Dust suppression by water spraying during dry weather, covering of stockpiles, enforcement of a 10 km/h site speed limit, and regular road sweeping to prevent off-site dust migration.
- Surface water and drainage: Temporary swales, silt fences, sediment traps, and bunds will be installed to prevent sediment and pollutants entering drains or watercourses. Sediment settlement ponds will be used for pumped water. Soil stockpiles will be covered and located away from sensitive areas.
- Concrete and materials management: A designated, bunded and lined concrete washout area will be established. Excess slurry and wash water will be contained and prevented from entering drains.
- Fuel, oils, and hazardous materials: All fuels, oils and chemicals will be stored in bunded and roofed compounds with drip trays, spill kits, and double-skinned tanks. Refuelling will take place in designated bunded areas. Plant and equipment will be inspected regularly to prevent leaks.
- Site management: Works will be phased to minimise exposed soils, with disturbed areas reinstated promptly. Daily inspections of drainage and pollution control measures will be carried out, with records maintained as part of the compliance log.
- Emergency response: An emergency spill response plan is in place, with trained staff and spill kits available on site. Any incident will be reported immediately and contained in line with best practice.

Through implementation of these measures, the CEMP ensures that risks of sediment release, hydrocarbon or chemical pollution, dust, and noise impacts are effectively managed, thereby preventing any significant adverse effects on the conservation objectives of nearby European sites.

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

Pollution Prevention – Hydrocarbons and Chemicals

- All plant refuelling will occur in a designated refuelling zone on-site at authorised facilities to eliminate the risk of hydrocarbon spills within the development site. Hazardous substances, including fuels or oils, will be stored in 110% bund.
- Fuel absorbent material and pads will be available in the event of any accidental spillages. Only designated trained and competent operatives will be authorised to refuel plant on site and no refuelling operations shall be left unattended on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.
- Fuel containers will be stored within a secondary containment system, e.g., bunds for static tanks or a drip tray for mobile stores.
- Containers and bunding for storage of hydrocarbons and other chemicals will have a holding capacity of 110% of the volume to be stored.
- Spill kits available on site.
- Contractors will be responsible for ensuring the regular maintenance of construction plant and equipment, to prevent leaks.

Spill Response and Emergency Measures

- A spill response kit will be available onsite at all times, and all staff will be briefed on correct usage.
- Spill kits will be checked regularly and replenished immediately if used.
- Any spill will be contained at source, prevented from approaching the silt fence, and cleaned using approved absorbent materials.
- Contaminated materials arising from spill events will be removed to authorised facilities.

Concrete Management

- There will be no washout of concrete vehicles, chutes, hoppers, mixers or pumps onsite; all washout will occur off-site at authorised facilities.
- Concrete works will be fully contained using formwork, membranes or mud mats to prevent runoff or leaching.
- Concrete pouring will not proceed during heavy rainfall or when rainfall is forecast that could cause runoff.
- Wet concrete will be contained entirely within the designated working area.

Earthworks and Material Handling

- Stockpiles will be minimised, shaped to avoid runoff, and covered during adverse weather.
- Imported subsoil and other materials will be clean, certified and sourced from approved suppliers.
- Exposed ground will be reinstated as soon as practicable to reduce erosion risk.

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Surface Water and Groundwater Protection

- No direct discharge of water, silt, or pollutants to ground or groundwater.
- All runoff captured, contained and treated through settlement, filtration or SUDS before release.
- Excavations managed to prevent contaminated water entering permeable soils.
- Dewatering undertaken with settlement tanks, silt bags, or filtration socks.
- Permeable ground protected from accidental infiltration of contaminated runoff.

Invasive Species Prevention

- All machinery, vehicles and tools will be cleaned and dried before arriving onsite, including removal of all soil and vegetation adhering to tracks or surfaces.
- High-risk equipment will be disinfected with 1% Virkon Aquatic or equivalent.
- Aggregates or imported materials will be certified free of invasive species and sourced from authorised quarries.
- Site operatives will receive a briefing on identification and prevention of invasive alien species spread.
- Any inadvertent movement of invasive material (if detected) will trigger clean-down procedures prior to equipment leaving the area.

Waste and Site Management

- Waste will be segregated and removed to authorised waste facilities.
- Portable toilets and sanitary facilities will be fully self-contained, with no discharge to ground.
- Dust, noise and general emissions will be controlled using standard good-practice measures.
- Site housekeeping will ensure no loose materials or debris can migrate toward the silt-fenced boundary.

Weather and Scheduling Controls

- Works will not proceed during flood conditions, rising river levels or conditions that risk sediment mobilisation.
- Weather conditions will be monitored daily, with works scaled back or suspended during periods of heavy rainfall or ground saturation.

Operation Phase Mitigation

Wastewater

Foul wastewater from the 33 dwellings will be collected via a gravity-fed piped sewer network constructed in accordance with Uisce Éireann standards. The network will connect to the existing foul sewer located on Burmah Road (manhole F9), which Uisce Éireann has confirmed has sufficient capacity to accommodate the additional flows. All effluent will therefore be conveyed to the municipal wastewater treatment system for full treatment prior to discharge, ensuring that no untreated wastewater enters the groundwater or local surface water environment. All wastewater infrastructure will be designed and constructed in accordance with Uisce Éireann documents Code of Practice for Wastewater Infrastructure and Wastewater Infrastructure Standard Details.

Surface Water

The surface water management system is designed to ensure that runoff from the development is controlled to greenfield equivalent rates and discharged in a manner that prevents downstream flooding or water quality deterioration. Surface water from roofs and hardstanding will be collected via a piped gravity network and conveyed to underground attenuation tanks with a combined storage capacity of 492 m³. Outflows will be controlled by a Hydrobrake® vortex flow device (located at manhole S4), restricting discharges to 5.91 l/sec, equivalent to the calculated greenfield run-off rate for the site. This ensures that post-development runoff does not exceed pre-development levels, including during 1 in 30-year storm events with allowance for climate change.

Pollution control is provided by trapped road gullies, with regular inspection and cleaning forming part of the long-term maintenance regime. Flows will be discharged to the existing public storm sewer within Burmah Road in accordance with Sligo County Council requirements and SuDS best practice.

In addition to the engineered drainage measures, the Landscape Masterplan prepared by Cunnane Stratton Reynolds integrates SuDS elements such as rain gardens and moisture-tolerant planting within public open space. These landscaped features provide additional treatment of surface water by promoting natural filtration and interception of pollutants, thereby complementing the attenuation and flow control measures.

Routine maintenance of drainage infrastructure will be undertaken at least twice annually and after major storm events to ensure that attenuation and treatment systems continue to operate effectively. Maintenance records will be retained on site.

External lighting will comply with the approved Lighting Plan (Cunnane Stratton Reynolds, 2025) and will be directed downward and shielded to avoid light spill towards vegetated boundaries, thereby maintaining dark corridors for foraging bats and nocturnal fauna.

Hedgerow Management

Existing and newly planted hedgerows within the site will be managed to promote biodiversity and pollinator value. Cutting will be avoided during the bird nesting season (1 March to 31 August) and carried out on a rotational basis in late winter to retain flowering and fruiting resources. Hedgerows will be maintained at varying heights to encourage structural diversity, and trimming will be limited to every 2–3 years where possible. Native species such as hawthorn, holly, hazel, and blackthorn will be prioritised for planting and infilling, and any ornamental non-natives will be replaced with native equivalents over time. Margins at the base of hedgerows will be left uncut to allow wildflowers and grasses to establish, providing nectar and shelter for invertebrates in line with the All-Ireland Pollinator Plan (2021–2025).

SuDS and Multi-Species Grassland Management

SuDS features such as rain gardens, swales, and infiltration areas will be planted with multi-species grassland and native herbaceous plants tolerant of periodic inundation. These areas will be managed under a low-intensity regime, with mowing restricted to twice annually, once in mid-summer and once in autumn, to allow flowering and seed set. Cuttings will be removed after each mow to maintain low soil fertility and encourage species diversity. Bare patches and wet margins will be retained to benefit pollinators and invertebrates, and herbicide use will be avoided except for targeted spot treatment of invasive species if required. The management of these areas will be reviewed periodically by the ECoW

or site manager to ensure the continued ecological function of the SuDS planting and its contribution to water filtration and biodiversity enhancement.

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7. Concluding Statement

This Natura Impact Statement (NIS) has been prepared in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC) and Part XAB of the Planning and Development Regulations 2001 (as amended). It provides a detailed assessment of the potential for the proposed development at Burmah Road, Strandhill, Co. Sligo, to affect the integrity of any European sites, either alone or in combination with other plans or projects, in view of their conservation objectives.

The assessment has considered all elements of the proposed development, including construction and operational activities, potential source–pathway–receptor linkages, and the sensitivity of qualifying interests and special conservation interests within the following European sites:

- Ballysadare Bay SAC (Site Code: 000622)
- Cummeen Strand/Drumcliff Bay SAC (Site Code: 000627)
- Ballysadare Bay SPA (Site Code: 004129)
- Cummeen Strand SPA (Site Code: 004035)

The potential for indirect effects on groundwater-dependent qualifying interests, notably *Vertigo angustior* [1014] and Humid Dune Slacks [2190], was identified and assessed. Similarly, potential ex-situ disturbance of Special Conservation Interest bird species associated with Ballysadare Bay SPA and Cummeen Strand SPA was evaluated. In each case, the assessment demonstrates that there are no direct pathways or mechanisms by which significant adverse effects on site integrity could occur, provided that the identified mitigation measures are implemented in full.

Mitigation measures are integrated into the Construction Environmental Management Plan (CEMP) and the Landscape Masterplan and include comprehensive pollution prevention, drainage control, and SuDS measures; ecological supervision by a qualified ECoW; and long-term management of landscaping, hedgerows, and SuDS features in accordance with the All-Ireland Pollinator Plan. These measures will ensure that construction and operational activities do not result in contamination, disturbance, or hydrological alteration capable of affecting the structure or function of any European site.

Having regard to:

- the distance between the proposed development and all designated site boundaries;
- the absence of suitable habitats within or adjacent to the site;
- the limited potential for any hydrological or hydrogeological connectivity; and
- the comprehensive mitigation measures to be applied during construction and operation;

it is concluded that the proposed development, either alone or in combination with any other plan or project, will not adversely affect the integrity of Ballysadare Bay SAC (000622), Cummeen Strand/Drumcliff Bay SAC (000627), Ballysadare Bay SPA (004129), or Cummeen Strand SPA (004035) in view of their conservation objectives.

Accordingly, the competent authority may determine, in accordance with Article 6(3) of the Habitats Directive, that the proposed development can proceed as proposed, subject to adherence to the identified mitigation measures and the Construction Environmental Management Plan.

8. References

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