

Proposed Housing Development,

Shore 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.

The assessment in this report is based on a desk study undertaken in April 2025 and a field survey undertaken in April 2025.

1.2 Characteristics of Proposed Development

The proposed development is located at The Promenade, Shore Road, Carrowbunnaun, Strandhill, Co. Sligo (ITM: 560302, 835841). It involves the redevelopment of an existing derelict bed and breakfast building situated on a 0.098-hectare coastal site along Shore Road, a prominent area within Strandhill village. The site lies within an established mixed-use and tourism-focused setting and is positioned directly adjacent to the public promenade and local amenities.

The development proposal comprises:

"Permission to partially demolish existing derelict B&B building, remodel / deep retrofit, extend and change use to provide the following: 1 no. private dwelling apartment at first floor level, 1 no. private dwelling duplex apartment at first floor and new second floor level, provide 3 no. x 2-bed holiday apartments at ground floor level, changes to fenestration, changes to external façade envelope and finishes, upgrade of 2 no. existing vehicle gateway entrances, upgrade existing on-site disabled car parking space to front elevation, provide new on-site 7 no. car parking spaces at rear of the building, demolish shed to rear of site, together with all associated site works, all required connections to utility services, site landscaping and boundary treatments."

In addition to the residential and short-stay elements, the proposed works include significant energy and sustainability upgrades. These include the use of airtight construction methods, triple-glazed aluminium-framed windows with a U-value of 0.7 W/m²K, mechanical ventilation with heat recovery, and roof-mounted PV solar panels. Subject to technical feasibility, a ground-source or air-to-water heat pump will be installed to support renewable heating.

The landscaping plan proposes pollinator-friendly perennial planting, a native wildflower meadow, and two areas of sedum green roof to promote biodiversity. Ornamental planting will be integrated around the building, with bark mulch finishes and native tree retention where possible. A bin storage area and a covered bicycle shelter (10 spaces) are included within the rear site layout.



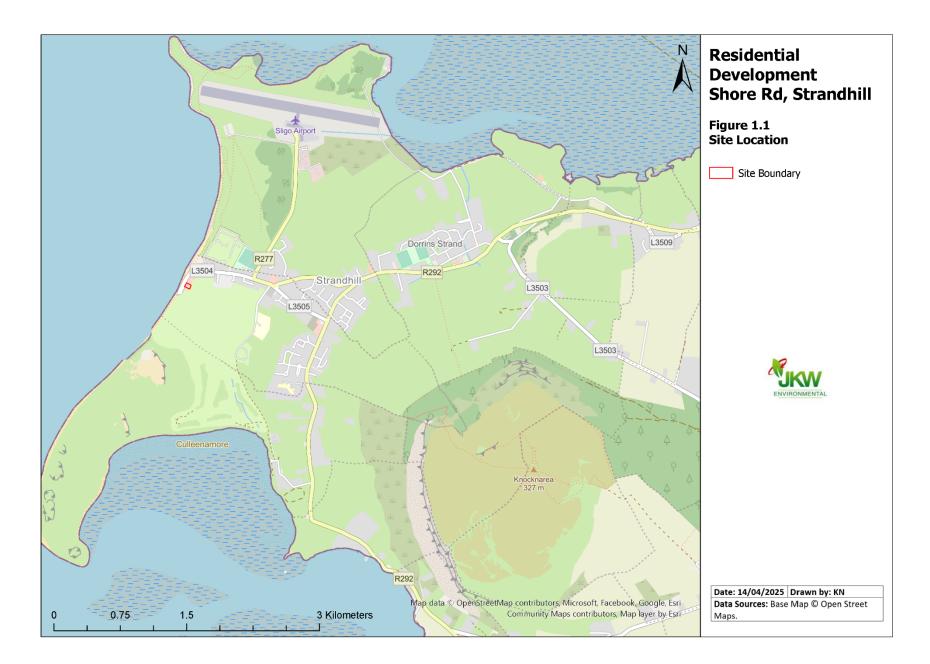
Access will be via two upgraded existing gateways, with a total of nine car parking spaces proposed at the rear, including two spaces carried over from the existing arrangement. Stormwater will be managed via permeable surfaces and petrol interceptors in accordance with SuDS principles.

A Confirmation of Feasibility has been received from Uisce Éireann confirming that water supply is feasible without infrastructure upgrades and that a wastewater connection is feasible subject to the extension of the public sewer, located approximately 40 metres north of the site. All wastewater infrastructure shall be designed and constructed in accordance with Irish Water documents "Code of Practice for Wastewater Infrastructure" and "Wastewater Infrastructure Standard Details.

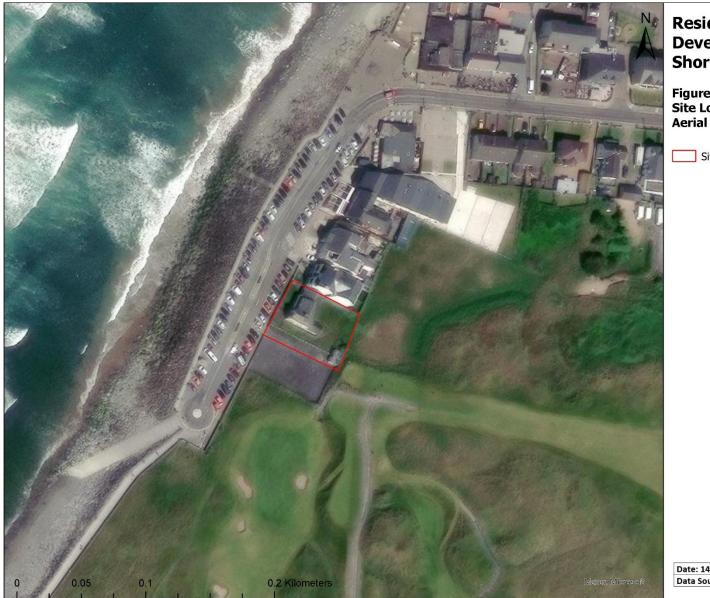
Surface water from the proposed development will discharge to the public surface water network. To reduce and attenuate surface water flow, the proposed development has been designed in accordance with the principles of Sustainable Urban Drainage Systems (SUDS). All proposed hard surfaces within the development will be constructed using permeable materials to promote infiltration and minimise surface runoff. In addition, two Sedum green roofs are proposed, which will further assist with attenuation, improve water quality, and contribute to biodiversity enhancement. A Class 1 Petrol/Oil Bypass Interceptor will be installed to treat runoff and remove hydrocarbons prior to discharge. Furthermore, a flow control device will be fitted to restrict the discharge rate to the public network, thereby reducing the risk of downstream flooding and promoting sustainable management of surface water.

The proposal is consistent with the vision of the Sligo County Development Plan 2024–2030 for the Shore Road and Promenade area, which supports high-quality redevelopment and the enhancement of public realm and tourism infrastructure. The proposed development aligns with the objectives of the Part 8 public realm upgrade and will positively contribute to the built character and hospitality offering of Strandhill village.









Residential Development Shore Rd, Strandhill

Figure 1.2 Site Location **Aerial View**

Site Boundary



Date: 14/04/2025 Drawn by: KN Data Sources: Base Map © Microsoft.



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.



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) – G63C & G53X.
- Birds of Conservation Concern in Ireland (Gilbert et al, 2021), available at https://birdwatchireland.ie/birds-of-conservation-concern-in-ireland/
- Information on the surface water network and surface water quality in the area available from www.epa.ie
- Information on soils, geology and hydrogeology in the area available from the Geological Survey Ireland (GSI) online Spatial Resources service. Available from https://www.gsi.ie/en-ie/data-and-maps/Pages/Groundwater.aspx
- Ordnance Survey of Ireland mapping and aerial photography available from https://tailte.ie/
- GeoHive online mapping (https://geohive.ie/index.html)
- Sligo County Development Plan 2024-2030
- 'Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors' (CIRIA, 2001)

3.2 Field Survey

A multidisciplinary ecological walkover survey of the site was conducted on the on the 14th April 2025 in line with NRA (2009) guidelines (Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes) and the methodology described in Best Practice Guidance for Habitat Survey and Mapping⁶. Habitats within the site boundary were classified using 'A Guide to Habitats in Ireland' (Fossitt, 2000)⁷. The dominant plant species present in each habitat were recorded during the field surveys and this is considered sufficient to allow accurate classification of the habitats present.

² www.google.ie/maps

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

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

⁵ https://gis.epa.ie/)

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

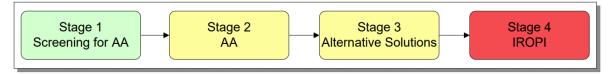
⁷ Fossitt, J.A. (2000) A Guide to Habitats in Ireland. Heritage Council, Kilkenny



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.

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

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



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 artificial non-agricultural vegetated areas, intertidal flats, 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 species: Atlantic White-sided Dolphin (*Lagenorhynchus acutus*), Common Dolphin (*Delphinus delphis*), Striped Dolphin (*Stenella coeruleoalba*), Common Porpoise (*Phocoena phocoena*), Risso's Dolphin (*Grampus griseus*), True's Beaked Whale (*Mesoplodon mirus*), White-beaked Dolphin (*Lagenorhynchus albirostris*), Common Seal (*Phoca vitulina*), Narrow-mouthed Whorl Snail (*Vertigo (Vertilla) angustior*), Common Lizard (*Zootoca vivipara*), Eurasian Badger (*Meles meles*), Eurasian Pygmy Shrew (*Sorex minutus*), Pine Marten (*Martes martes*), Irish Stoat (*Mustela erminea subsp. hibernica*), Irish Hare (*Lepus timidus subsp. hibernicus*), within the 2km polygons (G63C & G53X) 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 1.6km 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 2016-2021. 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 2016-2021 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.

4.2 Field Survey

The site consists of a derelict building and surrounding ground that includes a combination of artificial surfaces, recolonising bare ground, and unmanaged semi-natural grassland. Much of the site comprises compacted gravel and stone, associated with previous development and recent disturbance, which falls within the Fossitt category BL3 – Buildings and Artificial Surfaces. These areas include the footprint of the building itself and gravel-covered zones surrounding it, where evidence of ongoing or historic construction activity is present.

In addition to the hardstanding, parts of the site where the ground has been recently disturbed or stripped of vegetation are undergoing early-stage recolonisation by opportunistic species. These areas



are best classified as ED3 – Recolonising Bare Ground, with patchy vegetation comprising species adapted to disturbed soils.

The grassed areas surrounding the buildings are unmanaged and species-poor, but they support a range of coarse grasses and ruderal forbs, including ribwort plantain (*Plantago lanceolata*), broad-leaved dock (*Rumex obtusifolius*), white clover (*Trifolium repens*), and various lawn grasses. These areas most closely correspond to GS2 – Dry Meadows and Grassy Verges under the Fossitt classification. Although not botanically diverse, these grasslands are not maintained through regular mowing or grazing and do not exhibit the uniformity or fertility associated with improved grasslands.

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

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.

No invasive species listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended, were recorded on or adjacent to the site during the field survey.

The site, which is dominated by hardstanding, recolonising bare ground, and unmanaged grassy areas, 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 for *Vertigo angustior* (Narrow-mouthed Whorl Snail), as described in the Conservation Objectives Document (NPWS, 2013), consists of fixed dunes and species-rich grassland with a vegetation height of 10–30 cm. No dune habitat or areas resembling this vegetation structure were recorded within the site. The remaining Qualifying Interest species of the above European Sites are aquatic or marine in nature, and the terrestrial, disturbed character of the site does not provide suitable supporting habitat for *Petromyzon marinus* (Sea Lamprey), *Lampetra fluviatilis* (River Lamprey), or *Phoca vitulina* (Harbour Seal).



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.
- Ecological¹⁰ and Landscape¹¹ connectivity.

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

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

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

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

¹⁰ 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)

¹¹ 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)



Table 5.1. Natura 2000 Sites within zone of influence

Natura 2000 site	Distance from Site ¹²	Qualifying Interests	Conservation Objectives	Identification of Source-Pathway Receptor chain and potential for Likely Significant Effects
Special Areas of C		(C)		
		-1		
Cummeen	c. 400m north	Habitats:	To maintain or restore the	There will be no direct effects on this European Site as the
Strand/Drumcliff		[1130] Estuaries	favourable conservation	proposed development is located entirely outside of, and more
Bay (Sligo Bay)		[1140] Tidal Mudflats	condition of habitats and	than 300m from, the SAC. There will be no direct loss of any Annex
SAC [000627]		and Sandflats	species designated within the	I habitat or supporting habitat for Annex II species associated with
		[2110] Embryonic	Cummeen Strand/Drumcliff Bay	this SAC.
		Shifting Dunes	(Sligo Bay) SAC which is defined	
		[2120] Marram Dunes	by alist of specific attributes and	There are no open drains or watercourses within the proposed
		(White Dunes)	targets.	development site boundary. The nearest mapped watercourse
		[2130] Fixed Dunes (Grey		(Killaspugbrone stream, EPA code: 35K44) is located
		Dunes)*	Full details of the conservation	approximately 1.6km east of the Site. No potential for indirect
		[5130] Juniper Scrub	objectives can be found at:	effects on the SAC via hydrological connections with this
		[6210] Orchid-rich		watercourse was identified.
		Calcareous Grassland*	https://www.npws.ie/sites/defau	
		[7220] Petrifying	It/files/protected-	The site is located within the Drumcliff–Strandhill WFD
		Springs*	sites/conservation_objectives/C	Groundwater body, which also underlies part of Cummeen
		Species:	<u>0000627.pdf</u>	Strand/Drumcliff Bay (Sligo Bay) SAC. There is a potential risk of
		[1014] Narrow-mouthed		percolation of pollutants (e.g. hydrocarbons, cementitious
		Whorl Snail (Vertigo		materials, nutrients) to groundwater during the construction or
		angustior)		operational phases. Although the development site itself does not
		[1095] Sea Lamprey		support any suitable habitat for Vertigo angustior (Narrow-
		(Petromyzon marinus)		mouthed Whorl Snail), this Annex II species is present within the
		[1099] River Lamprey		SAC and is known to be highly sensitive to changes in groundwater
		(Lampetra fluviatilis)		quality and level. Therefore, taking a precautionary approach, a

¹² Measured in a straight line between the Site and closest point of Natura 2000 site boundary



		[1365] Common (Harbour) Seal (<i>Phoca</i> <i>vitulina</i>)		 potential pathway for indirect effects on the species via groundwater cannot be excluded. The site is located within a built-up coastal setting and lies approximately 27 metres from the shoreline at Strandhill. During the construction phase, there is potential for contaminated surface water runoff—such as silt-laden water or runoff containing hydrocarbons or cementitious materials—to enter road gullies or flow overland onto Shore Road and ultimately discharge to Sligo Bay. In the absence of appropriate pollution prevention measures, this presents a potential pathway for indirect effects on coastal water quality and, by extension, on the qualifying interests of the SAC. This potential impact is being identified on a highly precautionary basis, as the assessment assumes a worst-case scenario to ensure full consideration of even unlikely risks to the nearby European site. Potential for likely significant effects on this European site was identified, when considered in the absence of any
				mitigation, individually or cumulatively with other plans or projects. Therefore, further assessment is required.
Ballysadare Bay SAC [000622]	c. 356m south	Habitats: [1130] Estuaries [1140] Tidal Mudflats and Sandflats [2110] Embryonic Shifting Dunes	To maintain or restore the favourable conservation condition of habitats and species designated within Ballysadare Bay SAC which is defined by alist of specific	There will be no direct effects on this European Site as the proposed development is located entirely outside of, and approximately 356 metres north of, the SAC boundary. There will be no direct loss of any Annex I habitat or supporting habitat for Annex II species associated with this SAC.
		[2120] Marram Dunes (White Dunes)	attributes and targets. Full details of the conservation	There are no watercourses or open drains within the proposed development site. The site lies approximately 27 metres from the shoreline at Strandhill, which is hydrologically connected to Ballysadare Bay via the coastal marine environment. Although



	1		
	[2190] Humid Dune	objectives can be found at:	there is no direct surface water pathway to the SAC, taking a
	Slacks		precautionary approach there is potential for contaminated
	Species:	https://www.npws.ie/sites/defa	surface water runoff during the construction phase (e.g. silt-laden
	[1014] Narrow-mouthed	ult/files/protected-	or hydrocarbon-contaminated water) to reach Shore Road and
	Whorl Snail (Vertigo	sites/conservation_objectives/C	discharge into adjacent coastal waters. In the absence of
	angustior)	<u>0000622.pdf</u>	appropriate construction-phase controls, this presents a plausible
	[1365] Common		pathway for indirect effects on water quality within the SAC.
	(Harbour) Seal (<i>Phoca</i>		
	vitulina)		The site is located within the Drumcliff–Strandhill WFD
			Groundwater body, which also underlies part of Ballysadare Bay
			SAC. There is a theoretical risk of percolation of pollutants (e.g.
			hydrocarbons, cementitious materials, nutrients) to groundwater
			during the construction or operational phases. Although the
			development site itself does not support any suitable habitat for
			Vertigo angustior (Narrow-mouthed Whorl Snail), this Annex II
			species is present within the SAC and is known to be highly
			sensitive to changes in groundwater quality and level. Therefore,
			taking a precautionary approach, a potential pathway for indirect
			effects on the species via groundwater cannot be excluded.
			The development site does not support suitable habitat for
			Common (Harbour) Seal (<i>Phoca vitulina</i>), and no potential for
			indirect disturbance or displacement of this species has been
			identified.
			Potential for likely significant effects on this European site was
			identified, when considered in the absence of any mitigation,
			individually or cumulatively with other plans or projects. Therefore, further assessment is required.
Lough Gill SAC c. 9.3km east	Habitats:	To maintain or restore the	The Site is located outside the boundary of this SAC and there is
[001976]	[3150] Natural Eutrophic	favourable conservation	no potential for direct effect.
	Lakes	condition of habitats and	· ·



			1	
		[6210] Orchid-rich Calcareous Grassland* [91A0] Old Oak Woodlands	species designated within Lough Gill SAC which is defined by a list of specific attributes and targets.	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
		[91E0] Alluvial Forests* Species: [1092] White-clawed Crayfish	Full details of the conservation objectives can be found at:	(Carrowmore East & Dromahair) to the Site (Drumcliff-Strandhill). No potential for indirect effects on the SAC due to deterioration of water quality was identified.
		(Austropotamobius pallipes) [1095] Sea Lamprey (Petromyzon marinus) [1096] Brook Lamprey (Lampetra planeri) [1099] River Lamprey (Lampetra fluviatilis) [1106] Atlantic Salmon (Salmo salar) [1355] Otter (Lutra lutra)	https://www.npws.ie/sites/defa ult/files/protected- sites/conservation_objectives/C O001976.pdf	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. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Union Wood SAC [000638]	c. 10.3km south east	Habitats: [91A0] Old Oak Woodlands	To maintain or restore the favourable conservation condition of habitats and species designated within Union Wood SAC which is defined by a list of specific attributes and targets.	The Site is located outside the boundary of this SAC and there is no potential for direct effect. There is no connectivity between the Site and this SAC and the habitat for which the SAC is designated is terrestrial in nature. No source-pathway-receptor chain for effects has been identified.
			Full details of the conservation objectives can be found at:	No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further



			https://www.npws.ie/sites/defa ult/files/protected- sites/conservation_objectives/C 0000638.pdf	assessment is required.
Knockalongy and Knockachree Cliffs SAC [001669]	c. 10.2km 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: <u>https://www.npws.ie/sites/defa</u>	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. No source-pathway-receptor chain for effects has been identified. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
			ult/files/protected- sites/conservation_objectives/C 0001669.pdf	
Streedagh Point Dunes SAC [001680]	c. 14km north	Habitats: [1140] Tidal Mudflats and Sandflats [1220] Perennial Vegetation of Stony Banks [1330] Atlantic Salt Meadows [1410] Mediterranean	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	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 subcatchment, (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



		Salt Meadows [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes)* Species: [1014] Narrow-mouthed Whorl Snail (<i>Vertigo</i> <i>angustior</i>)	objectives can be found at: <u>https://www.npws.ie/sites/defa</u> <u>ult/files/protected-</u> <u>sites/conservation_objectives/C</u> <u>0001680.pdf</u>	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. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Unshin River SAC [001898]	c. 8.8km south east	Habitats: [3260] Floating River	To maintain or restore the favourable conservation	The Site is located outside the boundary of this SAC and there is no potential for direct effect.
		Vegetation	condition of habitats and	
		[6210] Orchid-rich	species designated within	No hydrological connectivity between the Site and the SAC was
		Calcareous Grassland*	Unshin River SAC which is	identified. The SAC is located within a separate WFD sub-
		[6410] Molinia Meadows	defined by a list of specific	catchment, (Owenmore[Sligo]_SC_040,
		[91E0] Alluvial Forests*	attributes and targets.	Owenmore[Sligo]_SC_030 and the Unshin_SC_010) to Site
		Species: [1106] Atlantic Salmon	Full details of the conservation	(Carrowgobbadagh_SC_010). The SAC is located with a separate WFD Groundwater body to the Site. No potential for indirect
		(Salmo salar)	objectives can be found at:	effects on the SAC due to deterioration of water quality was
		[1355] Otter (<i>Lutra lutra</i>)		identified.
			https://www.npws.ie/sites/defa	
			ult/files/protected-	The Site does not provide suitable habitat for any of the QI species
			sites/conservation_objectives/C	for which the SAC is designated. Given the absence of suitable
			<u>0001898.pdf</u>	habitat and the distance between the Site and the SAC, no potential for significant indirect effects via disturbance or
				displacement was identified.



				No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Ox Mountains Bogs SAC [002006]	c. 13.km 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 (Vertigo geyeri) [1528] Marsh Saxifrage (Saxifraga hirculus)	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: <u>https://www.npws.ie/sites/defa</u> <u>ult/files/protected-</u> <u>sites/conservation_objectives/C</u> <u>O002006.pdf</u>	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. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Ben Bulben, Gleniff and Glenade Complex	c. 12km north east	Habitats: [3260] Floating River Vegetation	To maintain or restore the favourable conservation condition of habitats and	The Site is located outside the boundary of this SAC and there is no potential for direct effect.



SAC [000623]	[4010] Wet Heath	species designated within Ben	No hydrological connectivity between the Site and the SAC was
	[4030] Dry Heath	Bulben, Gleniff and Glenade	identified. The SAC is located within a separate WFD sub-
	[4060] Alpine and	Complex SAC which is defined	catchment to Site. The SAC is located with a separate WFD
	Subalpine Heaths	by a list of specific attributes	Groundwater body to the Site. No potential for indirect effects on
	[5130] Juniper Scrub	and targets.	the SAC due to deterioration of water quality was identified.
	[6210] Orchid-rich		
	Calcareous Grassland*	Full details of the conservation	The Site does not provide suitable habitat for any of the QI species
	[6230] Species-rich	objectives can be found at:	for which the SAC is designated. Given the absence of suitable
	Nardus Grassland*		habitat and the distance between the Site and the SAC, no
	[6430] Hydrophilous Tall	https://www.npws.ie/sites/defa	potential for significant indirect effects via disturbance or
	Herb Communities	ult/files/protected-	displacement was identified.
	[7220] Petrifying	sites/conservation_objectives/C	
	Springs*	<u>0000623.pdf</u>	No potential for likely significant effects on this European site was
	[7130] Blanket Bogs		identified, when considered in the absence of any mitigation,
	(Active)*		individually or cumulatively with other plans or projects. This site
	[7140] Transition Mires		is not within the likely zone of influence and no further assessment
	[7230] Alkaline Fens		is required.
	[8110] Siliceous Scree		
	[8120] Calcareous Scree		
	[8210] Calcareous Rocky		
	Slopes		
	Species:		
	[1013] Geyer's Whorl		
	Snail (Vertigo geyeri)		
	[1355] Otter (<i>Lutra lutra</i>)		



Oystercatcher (Haematopus ostralegus) [A130] Redshank (Tringa totanus) [A162]species designated within the Cummeen Strand SPA which is defined by a list of specific attributes and targets.any SPA-designated habitat or supporting wetland habitat for Special Conservation Interest (SCI) bird species.Wetland and Waterbirds [A999]Full details of the conservation objectives can be found at:The proposed development site does not contain any habitats that are suitable for Light-bellied Brent Goose (Branta bernicla hrota), Oystercatcher (Haematopus ostralegus), Redshank (Tringa totanus), or other wetland and waterbird species for which the SPA is designated. The site comprises a previously developed plot within https://www.npws.ie/sites/defau a built-up coastal village setting. It/files/protected- sites/conservation_objectives/C O004035.pdfThere are no watercourses or open drains on the site. However, the site lies approximately 27 metres from the shoreline at Strandhill, which forms part of the broader Sligo Bay coastal system and connects to Cummeen Strand to the north. During the construction phase, there is potential for contaminated surface water runoff (e.g. hydrocarbons, sediment, cementitious materials) to enter Shore Road and discharge to the nearby coastal waters. In the absence of appropriate construction-phase controls, this presents a plausible pathway for indirect effects on water quality within the wider estuarine system. This potential impact is identified on a precautionary basis to ensure that even low-probability risks to coastal water quality and downstream European sites are fully considered.	Special Protection	Special Protection Areas (SPA)				
	Cummeen Strand		(Branta bernicla hrota) [A046] Oystercatcher (Haematopus ostralegus) [A130] Redshank (Tringa totanus) [A162] Wetland and Waterbirds	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: <u>https://www.npws.ie/sites/defau</u> <u>lt/files/protected-</u> <u>sites/conservation_objectives/C</u>	development is located entirely outside of, and approximately 1.4km south of, the SPA boundary. There will be no direct loss of any SPA-designated habitat or supporting wetland habitat for Special Conservation Interest (SCI) bird species. The proposed development site does not contain any habitats that are suitable for Light-bellied Brent Goose (<i>Branta bernicla hrota</i>), Oystercatcher (<i>Haematopus ostralegus</i>), Redshank (<i>Tringa totanus</i>), or other wetland and waterbird species for which the SPA is designated. The site comprises a previously developed plot within a built-up coastal village setting. There are no watercourses or open drains on the site. However, the site lies approximately 27 metres from the shoreline at Strandhill, which forms part of the broader Sligo Bay coastal system and connects to Cummeen Strand to the north. During the construction phase, there is potential for contaminated surface water runoff (e.g. hydrocarbons, sediment, cementitious materials) to enter Shore Road and discharge to the nearby coastal waters. In the absence of appropriate construction-phase controls, this presents a plausible pathway for indirect effects on water quality within the wider estuarine system. This potential impact is identified on a precautionary basis to ensure that even low-probability risks to coastal water quality and downstream European sites are fully	



				 habitat or functional linkages, no significant impacts due to lighting, noise, or general disturbance on SCI bird species are anticipated during either the construction or operational phases Potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. Therefore, further assessment is required.
Ballysadare Bay SPA [004129]	c. 230m south	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Grey Plover (<i>Pluvialis</i> <i>squatarola</i>) [A141] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa</i> <i>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/defa ult/files/protected- sites/conservation_objectives/C O004129.pdf	There will be no direct effects on this European Site as the proposed development is located entirely outside of, and approximately 230 metres north of, the SPA boundary. There will be no direct loss of any SPA-designated habitat or supporting wetland habitat for Special Conservation Interest (SCI) bird species. The proposed development site does not support any habitats suitable for Light-bellied Brent Goose (<i>Branta bernicla hrota</i>), Grey Plover (<i>Pluvialis squatarola</i>), Dunlin (<i>Calidris alpina</i>), Bar-tailed Godwit (<i>Limosa lapponica</i>), Redshank (<i>Tringa totanus</i>), or other waterbird species for which the SPA is designated. The site comprises a previously developed plot within the built-up area of Strandhill. There are no watercourses or open drains on the site. However, the site lies approximately 27 metres from the shoreline at Strandhill, which forms part of the broader Sligo Bay coastal system and connects to Cummeen Strand to the north. During the construction phase, there is potential for contaminated surface water runoff (e.g. hydrocarbons, sediment, cementitious materials) to enter Shore Road and discharge to the nearby coastal waters. In the absence of appropriate construction-phase controls, this presents a plausible pathway for indirect effects on water quality within the wider estuarine system. This potential impact is identified on a



				precautionary basis to ensure that even low-probability risks to coastal water quality and downstream European sites are fully considered. The site is located within a built-up area characterised by existing lighting, regular pedestrian and vehicular traffic, and general human activity associated with residential and tourist uses. Given the distance from the SPA and the lack of suitable habitat on site, no potential for disturbance or displacement of SCI bird species due to noise, lighting, or activity during construction or operation has been identified.
				Potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation,
				individually or cumulatively with other plans or projects. Therefore, further assessment is required.
Drumcliff Bay SPA [004013]	c. 5.5km north	Sanderling (<i>Calidris alba</i>) [A144] Bar-tailed Godwit	To maintain or restore the favourable conservation condition of habitats and	The Site is located outside the boundary of this SPA and there is no potential for direct effect.
		(Limosa lapponica) [A157]	species designated within the Drumcliff Bay SPA which is	No hydrological connectivity between the Site and the SPA was identified. The SPA is located within a separate WFD sub-catchment
		[A137] Wetland and Waterbirds [A999]	defined by a list of specific attributes and targets.	to site. No potential for indirect effects on the SPA due to deterioration of water guality was identified.
			Full details of the conservation	
			objectives can be found at:	The Site does not provide significant suitable habitat for any of the SCI species. Given the absence of significant habitat and the
			https://www.npws.ie/sites/defa	distance of 5.5km between the Site and the SPA, there is no
			ult/files/protected- sites/conservation objectives/C	potential for significant effects on this SPA due to disturbance of SCI species.
			<u>0004013.pdf</u>	
				No potential for likely significant effects on this European site was



				identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Aughris Head SPA [004133]	c. 10.2km west	Kittiwake (<i>Rissa</i> <i>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: <u>https://www.npws.ie/sites/defa</u> <u>ult/files/protected-</u> <u>sites/conservation_objectives/C</u> <u>O004133.pdf</u>	The Site is located outside the boundary of this SPA and there is no potential for direct effect. No hydrological connectivity between the Site and the SPA was identified. The SPA is located within a separate WFD sub-catchment to Site. The SPA is located with a separate WFD Groundwater body to the Site. No potential for indirect effects on the SPA due to deterioration of water quality was identified. The Site does not provide significant suitable habitat for any of the SCI species. Given the absence of significant habitat and the distance of 10.2km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Ardboline Island and Horse Island SPA [004135]	c. 9km north west	Cormorant (<i>Phalacrocorax carbo</i>) [A017] Barnacle Goose (<i>Branta</i> <i>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	The Site is located outside the boundary of this SPA and there is no potential for direct effect. 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

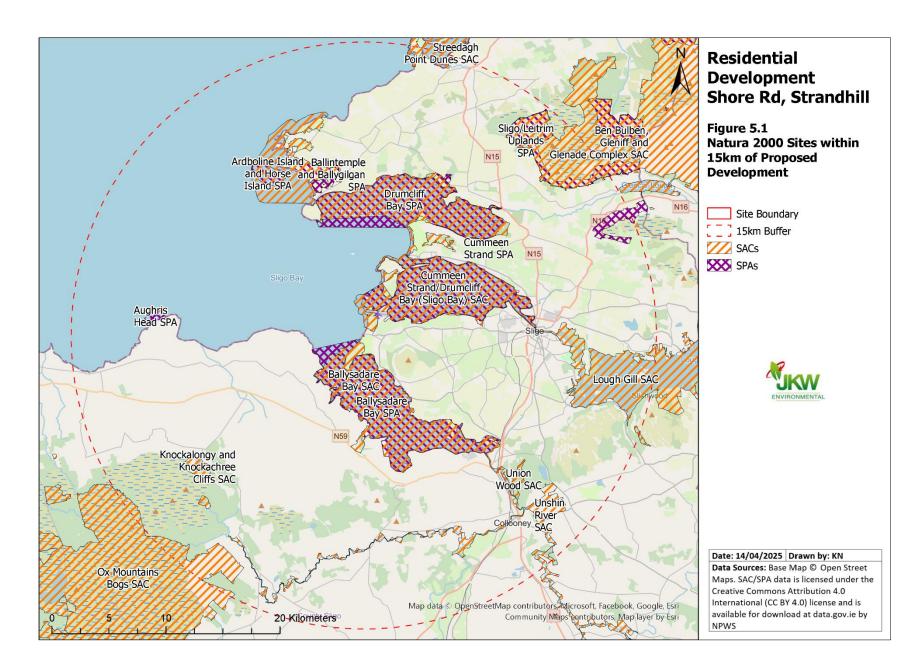


			list of specific attributes and targets. Full details of the conservation objectives can be found at: <u>https://www.npws.ie/sites/defa</u> <u>ult/files/protected-</u> <u>sites/conservation_objectives/C</u> <u>O004135.pdf</u>	to the Site. No potential for indirect effects on the SPA due to deterioration 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 9km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment is required.
Sligo/Leitrim Uplands SPA [004187]	c. 12km north east	Peregrine (<i>Falco</i> <i>peregrinus</i>) [A103] Chough (<i>Pyrrhocorax</i> <i>pyrrhocorax</i>) [A346]	To maintain or restore the favourable conservation condition of habitats and species designated within the Sligo/Leitrim Uplands SPA which is defined by a list of specific attributes and targets. Full details of the conservation objectives can be found at: <u>https://www.npws.ie/sites/defa</u> <u>ult/files/protected-</u> <u>sites/conservation_objectives/C</u> <u>0004187.pdf</u>	The Site is located outside the boundary of this SPA and there is no potential for direct effect. 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 12km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site



				is not within the likely zone of influence and no further assessment is required.
Ballintemple and Ballygilgan SPA [004234]	c. 7.7km 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: <u>https://www.npws.ie/sites/defa</u> <u>ult/files/protected-</u> <u>sites/conservation_objectives/C</u> <u>0004234.pdf</u>	The Site is located outside the boundary of this SPA and there is no potential for direct effect. 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 7.7km between the Site and the SPA, there is no potential for significant effects on this SPA due to disturbance of SCI species. No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, individually or cumulatively with other plans or projects. This site is not within the likely zone of influence and no further assessment







As shown in Table 5.1, 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.

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 Identification of Potential Impacts on Natura 2000 Sites

The potential impacts of the project on the habitats and species listed as qualifying interests for the Ballysadare Bay SAC, Cummeen Strand/ Drumcliff Bay SAC, Ballysadare Bay SPA and Cummeen Strand SPA are discussed in this section.

DoEHLG (2010) guidance for planning authorities states "If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA). Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact." This approach is adopted in this report to considering the likely significant effects of the proposed development.

A significant effect is defined in paragraph 49 of the Waddenzee Case C-127/0214¹³ as follows ".....pursuant to the first sentence of Article 6(3) of the Habitats Directive, where a plan or project not directly connected with or necessary to the management of a site is likely to undermine the site's conservation objectives, it must be considered likely to have a significant effect on that site. The assessment of that risk must be made in the light inter alia of the characteristics and specific environmental conditions of the site concerned by such a plan or project."

The likelihood of impacts occurring as a result of this application is established in light of the type and scale of the development, the location of the development with respect to Natura 2000 sites within the zone of influence and the qualifying interests and conservation objectives of those Natura 2000 sites.

¹³ <u>htts://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62002CJ0127</u>



5.3.1 Potential Impacts

There is no land take from any of European Sites as a result of the proposed works at Strandhill.

The Site is located entirely outside the boundaries of any designated site, therefore, there is no potential for direct effects.

The primary considerations for this project are identified to be the following:

- Surface water runoff during construction phase: Potential for contaminated runoff (e.g. sediment, hydrocarbons, cementitious material) to enter Shore Road and discharge into nearby coastal waters, with possible indirect effects on water quality in adjacent Natura 2000 sites.
- Potential groundwater contamination: Risk of percolation of pollutants (e.g. hydrocarbons, nutrients) to groundwater during construction or operation, with a potential indirect pathway to groundwater-dependent species (*Vertigo angustior*) in Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC.

The following activities associated with the project construction phase that may impact European sites are as follows:

- Site clearance, demolition and excavation for the redevelopment and extension of the existing building, access improvements, and landscaping works. These activities will disturb soil and surfacing materials, increasing the potential for sediment-laden or contaminated runoff to reach nearby coastal waters or percolate to groundwater.
- Storage and handling of construction materials, including hydrocarbons, cement-based products, and other hazardous substances: Spillage or accidental release during transport, mixing, or use may lead to contamination of soils, surface water runoff, or underlying groundwater, with potential for indirect effects on sensitive aquatic habitats and groundwaterdependent species.

5.4 Stage 1 Appropriate Assessment Screening Conclusion

It cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed development, individually or in combination with other plans and projects, would be likely to have a significant effect on:

- Ballysadare Bay SAC
- Cummeen Strand/ Drumcliff Bay SAC
- Ballysadare Bay SPA
- Cummeen Strand SPA

As a result, an Appropriate Assessment is required, and a Natura Impact Statement shall be prepared in respect of the proposed development.



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 project (either alone or in combination with other projects or plans) on the integrity of Ballysadare Bay SAC [000622], Cummeen Strand/ Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129] and Cummeen Strand SPA [004035] with respect to the conservation objectives of this site and to its structure and function. The focus is on demonstrating, with supporting evidence, that there will be no adverse effects on the integrity of Ballysadare Bay SAC [000622], Cummeen Strand/ Drumcliff Bay SAC [000627], Ballysadare Bay SPA [004129] and Cummeen Strand SPA [004035] should the proposed development proceed as planned and with appropriate mitigation.

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

The proposed development involves the partial demolition, deep retrofit, extension and change of use of an existing derelict bed and breakfast building to provide two private apartments and three holiday apartments, along with associated site works, landscaping, parking, and utility connections.

The elements of the proposed development identified as having potential to affect the above European sites are the release of sediment and/or pollutants during the construction phase. Taking a precautionary approach, it is considered that during construction, there is a risk that contaminated runoff (e.g. hydrocarbons, silt, or cementitious material) could enter Shore Road and discharge into nearby coastal waters. There is also a potential, albeit low, for indirect groundwater impacts during construction, which—again on a precautionary basis—may affect sensitive species such as *Vertigo angustior* in Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC.

6.1.2 Likely Cumulative Impact of the Proposed Works on European Sites, incombination 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
- Sligo Biodiversity Action Plan 2024-2030
- Strandhill Public Realm Enhancement 2025

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.

6.1.3 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.

6.1.4 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.

Rank	Negative Threats and Pressures Inst		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	101	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



Rank	Negative Threats and Pressures		Inside/Outside
Н	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
Μ	A02.01	agricultural intensification	Inside
Μ	D03	shipping lanes, ports, marine constructions	Inside
Μ	D03.01	port areas	Inside
Μ	E01.03	Dispersed habitation	Inside
Μ	G01.02	walking, horse-riding, and non-motorised vehicles	Inside
Μ	G01.03.02	off-road motorized driving	Inside
Μ	G02.01	Golf course	Inside
Μ	101	invasive non-native species	Inside

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

Table 6.3: Site-Specific Pressures and Threats for Ballysadare Bay SPA

Rank	Negative	Negative Threats and Pressures	
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 T	Negative Threats and Pressures	
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	Н	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



6.1.5 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:

Ballysadare Bay SAC:

Estuaries [1130]

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

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

Phoca vitulina (Harbour Seal) [1365]

The remaining qualifying interests (Table 5.1), such as terrestrial habitats, are sufficiently distant, not sensitive to the potential impacts and effects of the project and / or have no connectivity with the project and are thus not likely to be affected. The relevant threats and pressures, as outlined in the conservation objectives document for Ballysadare Bay SAC are shown below in Table 6.5.

Qualifying Interest	Relevant Threats and Pressures
Estuaries [1130]	Nutrient enrichment, water pollution, sedimentation, coastal
	erosion, disturbance from recreational activities
Mudflats and Sandflats not	Water pollution, sediment deposition, disturbance from
covered by seawater at low tide	recreational activities
[1140]	
Vertigo angustior (Narrow-	Groundwater contamination, hydrological changes, habitat
mouthed Whorl Snail) [1014]	degradation (e.g., vegetation change, drying out)
Phoca vitulina (Harbour Seal)	Pollution of marine waters (hydrocarbons, wastewater
[1365]	discharges), disturbance from human activity (recreation,
	construction)

Cummeen Strand/Drumcliff Bay SAC:

Estuaries [1130]

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

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

Petromyzon marinus (Sea Lamprey) [1095]

Phoca vitulina (Harbour Seal) [1365]

The remaining qualifying interests (Table 5.1), such as terrestrial habitats, are sufficiently distant, not sensitive to the potential impacts and effects of the project and / or have no connectivity with the project and are thus not likely to be affected. The relevant threats and pressures, as outlined in the conservation objectives document for Cummeen Strand/Drumcliff Bay SAC are shown below in Table 6.6.



Table 6.6: Threats and Pressures for Qualifying Interests of Cummeen Strand/Drumcliff Bay SAC

Qualifying Interest	Relevant Threats and Pressures
Estuaries [1130]	Nutrient enrichment, water pollution, sedimentation,
	coastal erosion, disturbance from recreational activities
Mudflats and Sandflats not covered	Pollution from wastewater and urban runoff, sediment
by seawater at low tide [1140]	accumulation, habitat disturbance
Vertigo angustior (Narrow-mouthed	Groundwater pollution, drainage of wet dune habitats,
Whorl Snail) [1014]	vegetation encroachment, habitat trampling
Petromyzon marinus (Sea Lamprey)	Water pollution, barriers to migration, deterioration of
[1095]	estuarine water quality
Phoca vitulina (Harbour Seal) [1365]	Marine pollution, human disturbance, habitat degradation
	of foraging areas

Ballysadare Bay SPA:

Wetlands [A999]

The relevant threats and pressures, as outlined in the conservation objectives document for Ballysadare Bay SPA are shown below in Table 6.7.

Table 6.7: Threats and Pressures for Qualifying Interests of Ballysadare Bay SPA

Special Conservation Interest (SCI)	Relevant Threats and Pressures
Wetlands and Waterbirds [A999]	Water pollution affecting prey availability, disturbance from human activities, habitat alteration (mudflat erosion, saltmarsh loss)

Cummeen Strand SPA:

Wetlands [A999]

The relevant threats and pressures, as outlined in the conservation objectives document for Cummeen Strand SPA are shown below in Table 6.8.

Table 6.8: Threats and Pressures for Qualifying Interests of Cummeen Strand SPA

Special Conservation Interest (SCI)		Relevant Threats and Pressures
Wetlands Waterbirds [A999]	and	Water pollution affecting prey availability, disturbance from human activities, habitat alteration (mudflat erosion, saltmarsh loss)

Potential Impacts on Water Quality (Surface Water and Groundwater)

Demolition and construction works associated with the proposed residential and holiday apartment development at Shore Road, Strandhill, Co. Sligo, including the removal of existing structures, site clearance, excavation, and installation of underground services, will take place in close proximity to the coastline of Sligo Bay. Although there are no open drains or watercourses within the development site, it lies approximately 27 metres from the shoreline of Sligo Bay. Although there are no open drains



or watercourses on site, overland flow during rainfall events could facilitate the discharge of sedimentladen or pollutant-rich runoff into the adjacent road drainage and eventually into the marine environment. In the absence of effective mitigation, such pollutants could include hydrocarbons, cementitious materials, and suspended solids, which may result in degradation of water quality within Ballysadare Bay SAC and SPA, Cummeen Strand/Drumcliff Bay SAC, and Cummeen Strand SPA.

The risk of contaminated runoff is elevated during phases of excavation, demolition, and the installation of subsurface infrastructure, particularly during wet weather. In the absence of effective mitigation, this could result in the deterioration of coastal water quality and increased turbidity in intertidal or nearshore environments. Such impacts may affect the ecological integrity of habitats and species designated under Ballysadare Bay SAC and SPA, Cummeen Strand SPA, and Cummeen Strand/Drumcliff Bay SAC, through changes in water chemistry, habitat structure, or prey availability.

During the construction phase, there is also a low but plausible risk of contamination of the underlying aquifer through infiltration, particularly if hazardous substances are spilled or incorrectly stored. The site lies within the Drumcliff–Strandhill WFD Groundwater body, which underlies and contributes to parts of both Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC. Although the development site itself does not support habitat for *Vertigo angustior*, this species is highly sensitive to changes in groundwater quality and hydrology. A deterioration in groundwater conditions could indirectly affect this species through impacts on the wetland and slack habitats it depends on.

During the operational phase, wastewater from the proposed residential and holiday apartment units will be discharged to the public sewer network. Uisce Éireann has confirmed the feasibility of this connection (Ref: CDS24010673, dated 24 January 2025), subject to a 40-metre sewer extension along Shore Road. The wastewater will be treated at Strandhill Wastewater Treatment Plant, which discharges to Sligo Bay. Provided the treatment plant continues to operate within its licensed capacity and that stormwater overflows are managed effectively, there is no predicted adverse effect on water quality within the designated sites.

Surface water management has been designed in line with Sustainable Urban Drainage Systems (SUDS) principles to attenuate flows and ensure high water quality prior to discharge. All surfaces within the development will be permeable, and runoff from roofs and hardstanding will be routed through a flow-controlled system incorporating attenuation features and a Class 1 Petrol/Oil Bypass Interceptor before entering the public surface water drainage network. This system will be capable of treating typical pollutants and reducing discharge volumes to match greenfield runoff rates, further lowering the risk of pollution reaching the marine environment.

Overall, in the absence of mitigation, the proposed development presents a potential risk to both surface water and groundwater quality, with possible indirect effects on nearby European sites and their qualifying habitats and species.

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

A deterioration in water quality within the greater Sligo Bay area as a result of the proposed development could affect the natural coastal and estuarine processes that support the qualifying interests of Ballysadare Bay SAC and SPA, Cummeen Strand SPA, and Cummeen Strand/Drumcliff Bay SAC. A reduction in water quality during the construction and operational phases, if unmitigated, could lead to increased sedimentation, pollution, or nutrient enrichment, which may adversely affect the condition and functioning of intertidal and estuarine habitats such as Estuaries [1130] and Mudflats



and sandflats not covered by seawater at low tide [1140]. These habitats provide important foraging and roosting areas for avian species of conservation interest and support the habitat requirements of *Phoca vitulina* (Harbour Seal) [1365]. *Petromyzon marinus* (Sea Lamprey), which uses estuarine and coastal waters as part of its life cycle, may be indirectly affected by deterioration in coastal water quality arising from the proposed development.

In addition, potential contamination of groundwater during construction could indirectly affect *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014], which is highly sensitive to changes in groundwater chemistry and levels.

Estuaries [1130]

Estuaries are a qualifying interest of both Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC. This habitat type is sensitive to changes in water quality and sediment inputs. The proposed development, although small in scale, involves demolition, excavation, and the handling of construction materials within close proximity to the shoreline. In the absence of adequate controls, these activities could result in the discharge of sediment or contaminants into adjacent marine waters connected to the estuarine system.

Such discharges, particularly during rainfall events, could alter the physicochemical conditions within the estuary by increasing turbidity, introducing pollutants, or shifting sediment dynamics. These changes could affect benthic communities, reduce habitat quality for estuarine species, and interfere with natural estuarine processes.

Any deterioration in water quality that alters the structure, function, or resilience of estuarine communities would compromise the conservation objectives of these Natura 2000 sites. Therefore, in the absence of mitigation, the proposed development has the potential to adversely affect the integrity of estuarine habitat.

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

This habitat is a qualifying interest of both Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC. It is highly sensitive to changes in water quality, sedimentation, and disturbance. Mudflats and sandflats support diverse benthic communities and form a critical food resource for wintering and migratory waterbirds. The integrity of this habitat depends on stable physicochemical conditions and minimal anthropogenic inputs.

Demolition and construction activities associated with the proposed development, including excavation and material handling, have the potential to release sediment and contaminants into the adjacent marine environment if not properly controlled. This could result in increased turbidity, organic loading, or chemical contamination within intertidal areas connected to the wider Sligo Bay system. Such changes may alter benthic community structure and reduce the availability of invertebrate prey for waterbirds.

In the absence of mitigation, the proposed development has the potential to adversely affect the structure and function of this habitat, and thus its overall integrity.

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

Vertigo angustior is a qualifying interest of both Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC. This species is restricted to wetland habitats such as humid dune slacks, fen edges, and



marshy grassland, where vegetation remains moist year-round due to a stable groundwater regime. The snail is highly sensitive to changes in water table, groundwater chemistry, and habitat structure. Its continued presence depends on clean, unpolluted groundwater and minimal hydrological disturbance.

While the development site does not support suitable habitat for *Vertigo angustior*, it lies within the Drumcliff–Strandhill WFD groundwater body, which also underlies parts of both SACs. During construction, there is potential for percolation of contaminants such as hydrocarbons, cementitious materials or suspended solids into the underlying aquifer. If such pollutants were to migrate toward areas supporting *Vertigo angustior*, they could degrade groundwater quality, thereby affecting the suitability of the species' habitat.

Given the species' specific ecological requirements and high sensitivity to hydrological and chemical change, even low-level or localised pollution of the groundwater body could indirectly affect its population viability. Although the degree of hydrogeological connectivity between the site and known populations is uncertain, a precautionary approach is required. In the absence of mitigation, the proposed development could pose a risk to the integrity of the SAC in its ability to support *Vertigo angustior*.

Phoca vitulina (Harbour Seal) [1365]

Harbour Seal is a qualifying interest of both Ballysadare Bay SAC and Cummeen Strand/Drumcliff Bay SAC. The species depends on clean coastal waters for foraging and on undisturbed haul-out sites for resting and breeding. While no haul-out sites are located near the proposed development, there is hydrological connectivity to the wider Sligo Bay system, which supports foraging activity.

Construction-phase runoff containing sediment or pollutants could reduce water quality in adjacent marine areas, potentially impacting prey availability.

Although the development is not likely to cause direct disturbance, indirect impacts on foraging habitat through reduced water quality could impair the site's capacity to support Harbour Seal. In the absence of mitigation, adverse effects on site integrity cannot be ruled out.

Petromyzon marinus (Sea Lamprey) [1095]

Sea Lamprey is a qualifying interest of Cummeen Strand/Drumcliff Bay SAC. While this species migrates upstream to spawn in freshwater rivers, it also relies on clean estuarine and coastal waters for key stages of its life cycle, including orientation during migration and juvenile development. The species is sensitive to pollution, increased turbidity, and changes in sediment dynamics.

The proposed development lies within the coastal zone of Sligo Bay, which is hydrologically connected to the estuarine areas used by Sea Lamprey. Construction-phase runoff containing sediment or pollutants could temporarily degrade water quality, potentially interfering with migratory behaviour or affecting juvenile habitat suitability.

Although the development is small in scale, any deterioration in water quality in estuarine or nearshore areas could impair conditions required by Sea Lamprey during critical life stages. In the absence of mitigation, the potential for adverse effects on the integrity of the SAC cannot be excluded.



Avian Species (including Wetlands and Waterbirds)

The Special Protection Areas (SPAs) associated with Ballysadare Bay and Cummeen Strand are designated for a range of waterbird species and their associated wetland habitats. These species rely on intertidal mudflats, sandflats, and shallow estuarine waters for foraging and roosting, and are particularly sensitive to habitat degradation, disturbance, and reductions in food availability caused by changes in water quality.

While the proposed development site does not contain suitable habitat or functionally connected areas used by these species, it lies within 230–1400 metres of designated intertidal areas and is hydrologically connected to them via the adjacent marine environment. Construction-phase runoff containing sediment, hydrocarbons or other pollutants may enter nearby coastal waters, potentially affecting the quality and productivity of intertidal feeding grounds.

A reduction in prey availability or degradation of intertidal habitats could negatively impact waterbird species and wetland assemblages through reduced foraging success, altered distribution patterns, or increased energetic costs. In the absence of mitigation, these effects may undermine the conservation objectives of the SPAs and adversely affect site integrity.

Consideration of Climate Change

The proposed development site is located within a low-lying, built-up coastal setting approximately 27 metres from the shoreline at Strandhill, which forms part of the Sligo Bay coastal system. In line with a precautionary approach, the potential for impacts associated with future climate change and coastal flooding has been considered in the context of regional coastal assessments, including the Sligo Bay CFERM Study (RPS, 2023).

According to projections under the Medium-Range Future Scenario (MRFS), sea levels in this region are anticipated to rise by up to +0.50 metres by 2100. This, combined with high-energy Atlantic wave exposure, storm surge activity, and existing erosion trends, increases the likelihood of both tidal inundation and wave overtopping in vulnerable coastal zones. Mapping produced as part of the CFERM Study predicts that, over the long term, the coastline between Strandhill town and the existing revetment at the wastewater treatment plant (WWTP) could retreat by up to 94 metres in the absence of intervention. In this context, the site of the proposed development—currently buffered from the coast by Shore Road and adjacent infrastructure—may be increasingly exposed to direct coastal processes over the next century.

Present-day flood risk modelling indicates that the Shore Road frontage is not at immediate risk of tidal inundation; however, it is subject to wave overtopping under more extreme climate scenarios. Simulations of a 1 in 200-year storm event under the MRFS (+0.5m sea level rise) show overtopping discharge rates at Strandhill of up to 66 L/s/m. These values increase markedly under more extreme sea level rise projections, with potential overtopping rates exceeding 1000 L/s/m under high-end future scenarios (H++FS). Given the site's location adjacent to the public carpark and a section of the existing rock armour revetment, this introduces a plausible pathway for floodwaters or storm-laden spray to affect the development site indirectly.

In terms of erosion, while the coastline to the south of the Strandhill carpark is currently stable and experiences modest sediment accretion due to longshore drift, episodic terminal erosion has been recorded near Shelly Valley and the southern ramp area. This localised instability presents an additional element of uncertainty regarding the long-term resilience of existing coastal buffers.



As such, while the site is not currently within a mapped floodplain, the precautionary approach adopted for this assessment recognises that future climate-driven changes—particularly sea level rise and increased storm frequency—could progressively elevate flood and erosion risks over the lifespan of the development. Mitigation through robust surface water management, use of permeable paving, and design measures that anticipate increasing exposure will be essential to ensure long-term sustainability and resilience.

Summary Statement on Integrity of European Sites

While the assessment identifies potential risks to surface water and groundwater quality, these risks are considered precautionary and reflect a worst-case approach. The proposed works are small in scale, involving minor excavation, demolition, and construction activities. Only small volumes of hazardous materials will be present on site, and standard good working practices will be implemented. Therefore, it is considered unlikely that significant volumes of contaminated runoff would be generated. Nonetheless, a precautionary approach has been adopted to ensure that any potential risk to the conservation objectives of nearby European Sites is fully addressed through appropriate mitigation measures.

6.1.7 Mitigation Measures

Roles and Responsibilities

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

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

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

Construction Environmental Management Plan (CEMP)

A Construction Environmental Management Plan (CEMP) will be prepared and agreed prior to the commencement of any works on site. The purpose of the CEMP will be to ensure that all construction activities are carried out in a manner that minimises environmental risks, prevents pollution, and protects nearby European Sites, in particular Ballysadare Bay SAC and SPA, Cummeen Strand/Drumcliff Bay SAC, and Cummeen Strand SPA.

The CEMP will outline the contractor's responsibility to adhere to best practice construction and environmental protection methods throughout the duration of the works. It will include detailed measures relating to:

<u>Surface Water Management:</u> Measures to prevent surface water runoff containing sediment, hydrocarbons, or other contaminants from entering the drainage network or discharging into Sligo Bay.



This will include the use of silt fences, sediment traps, temporary bunding, and designated refuelling areas away from drainage pathways.

<u>Pollution Prevention</u>: Strict protocols for the storage and handling of fuels, oils, concrete, and other hazardous substances. Spill response procedures will be detailed, including the provision of spill kits and staff training.

<u>Groundwater Protection</u>: Measures to prevent accidental infiltration of contaminants during any excavation or subsurface works, including the rapid containment and clean-up of any spills.

<u>Dust and Air Quality Management:</u> Measures such as water spraying of exposed soils and stockpiles during dry conditions, vehicle speed restrictions, and regular road cleaning to prevent dust generation.

<u>Noise and Vibration Management:</u> Implementation of appropriate working hours, maintenance of machinery, and the use of low-noise equipment where possible to minimise disturbance to sensitive receptors.

<u>Waste Management:</u> Procedures for the proper segregation, temporary storage, removal, and disposal of construction waste in accordance with legislative requirements.

<u>Monitoring and Reporting</u>: Provisions for the regular inspection of environmental protection measures, and prompt rectification if any failures or breaches occur. A site environmental officer will be nominated to oversee implementation of the CEMP.

The CEMP will be a live document, reviewed and updated as necessary throughout the construction period to reflect any changes in activities or conditions on site. It will also incorporate any specific requirements arising from planning conditions or consultation with relevant authorities.

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

Environmental Protection Measures

- The works shall be planned and executed in accordance with Environmental Protection Agency Guidelines.
- Where possible, all plant refuelling will occur off-site at authorised facilities to eliminate the risk of hydrocarbon spills within the development site. No hazardous substances, including fuels or oils, will be stored on site. In the unlikely event that on-site refuelling or temporary storage of hazardous materials becomes necessary, it will be strictly controlled.
- 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.
- Surface water arising during construction will be managed using temporary silt fences, settlement areas, or other suitable measures to prevent sediment-laden water from discharging to Shore Road or ultimately to Sligo Bay.
- Works will not take place during periods of heavy rainfall, and shall be scaled back or suspended if heavy rain is forecast.
- All excavated soil will be stored on site and reused for landscaping or transported off site to a designated waste facility.
- Exposed soils will be minimised, and stockpiles will be covered or stabilised during adverse weather conditions to prevent erosion.
- There shall be no washing out of concrete chutes on site.
- Portable toilets and sanitary facilities will be provided for site use.
- All site activities will be managed to prevent the mobilisation of dust, noise, and waste.
- Waste will be segregated and disposed of at authorised facilities.

Operation Phase Mitigation

In terms of operational mitigation, the development incorporates Sustainable Urban Drainage Systems (SUDS) design measures. Permeable paving will be used where feasible, and all surface water runoff from hard surfaces will be attenuated and treated via a Class 1 Petrol/Oil Bypass Interceptor and flow control device prior to controlled discharge to the public surface water network. These measures will minimise the risk of pollutants entering the receiving environment and will maintain discharge rates close to greenfield conditions.



7. Concluding Statement

This Natura Impact Statement has assessed the potential for the proposed development at Shore Road, Strandhill, Co. Sligo, to adversely affect the integrity of European Sites, either alone or in combination with other plans or projects.

Potential risks to Ballysadare Bay SAC, Ballysadare Bay SPA, Cummeen Strand/Drumcliff Bay SAC, and Cummeen Strand SPA were identified primarily in relation to construction-phase runoff, groundwater contamination, and operational surface water management. Following a detailed assessment of the proposed works, and taking into account the full implementation of the mitigation measures outlined in this report, it is concluded that the project will not adversely affect the structure, function, or conservation objectives of any European Site.

The assessment has been carried out in accordance with the requirements of Article 6(3) of the Habitats Directive and is based on best scientific knowledge and objective information. It has taken a precautionary approach, assuming a worst-case scenario where uncertainties exist.

With full adherence to the mitigation measures, including the preparation and implementation of a Construction Environmental Management Plan (CEMP), it can be determined with a high level of confidence that the proposed development will not result in adverse effects on the integrity of any Natura 2000 site, either alone or in combination with other plans or projects.



8. References

DoEHLG (2010). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government. Dublin.

European Commission (2021) Assessment of Plans and Projects significantly affecting Natura 2000 Sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.

European Commission (2018) Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats Directive'92/43/EEC.

European Commission (2002). Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg. European Commission.

European Union Habitats Directive, (1992) Council Directives 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

European Union Birds Directive (2009) Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version).

Fossit, J.A. (2000). A Guide to Habitats in Ireland. The Heritage Council.

NPWS (2013) Conservation Objectives: Ballysadare Bay SAC 000622. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2013) Conservation Objectives: Ballysadare Bay SPA 004129. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2024) Conservation Objectives: Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC 000627. Version 2. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

NPWS (2013) Conservation Objectives: Cummeen Strand SPA 004035. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2019a). The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report.

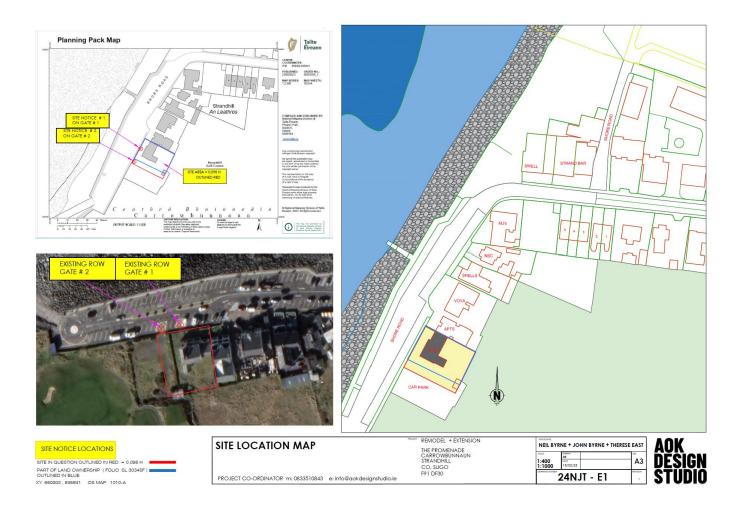
NPWS (2019b). The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments.

NPWS 2019. The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Dublin.

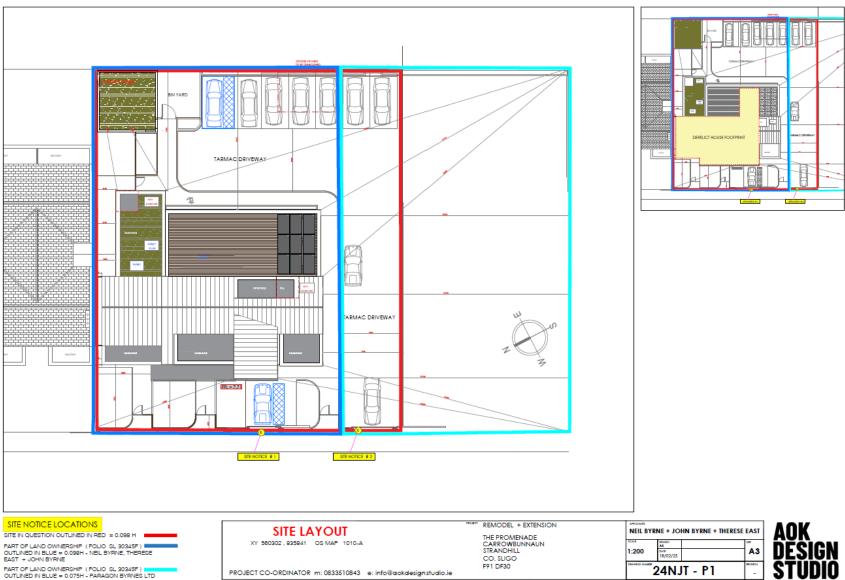
OPR (2021). OPR Practice Note PN01. Appropriate Assessment Screening for Development Management.



Appendix I - Site Drawings







PART OF LAND OWNERSHIP (FOLIO SL 30345F) OUTLINED IN BLUE = 0.075H - PARAGON BYRNES LTD



