Vincent Hannon Architects (VHA)

Sligo Grammar School Access Road

Natura Impact Statement (NIS)

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1. INTRODUCTION

1.1. Background

Woodrow Sustainable Solutions Ltd. (Woodrow) was commissioned by Vincent Hannon Architects to collate information to conduct a Natura Impact Statement (NIS) for the proposed Sligo Grammar School access road as part of a further information request by Sligo County Council.

The further information request which applies to the request for a NIS dated 29.03.2023 reads:

In accordance with Section 177T (5) of the Planning and Development Act 2000, as amended, the following direction is recommended:

> *"In accordance with Section 177U (4) of the Planning and Development Act 2000, as amended, the Planning Authority has determined that significant effects on European sites cannot be excluded and therefore an Appropriate Assessment of the proposed development is required. Therefore, in accordance with Section 177U (^) of the Planning and Development Act 2000 as amended, you are herby directed to submit a Natura Impact Statement (NIS).*
>
> *The NIS shall include all the necessary information as required by legislation to access the impact of the proposed development in accordance with other plans and projects on Natura 2000 sites in view of conservation objectives of the sites. In particular, the NIS shall also address the reasons set out in the determination by the Planning Authority in accordance with Section 177U (4) of the Planning and Development Act 2000 as amended."*

An Appropriate Assessment Screening report was submitted as part of the proposed application (Envest, 2017, Screening for Appropriate Assessment Report for the proposed Sligo Grammar School Access Road), which concluded that:

> *"There are no likely potential impacts, whether direct, indirect or cumulative/ in-combination which could give rise to adverse effects on the qualifying interests or the conservation objectives of any designated European Site. Consequently, this proposed development does not require an NIS or need to advance in the Appropriate Assessment process."*

This report assesses the potential for significant and adverse effects upon European sites, as a result of the proposed Sligo Grammar School access road works. The works are described in full within Section 2 of this report.

European sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The legal basis on which SACs are selected and designated is the EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. SACs are designated to assist the protection of certain habitats and species under the Habitats Directive. Ireland is required under the terms of the EU Birds Directive (2009/147/EC) to designate SPAs for the protection of endangered species of wild birds.

1.2. Legislative context for this report

1.2.1. Requirement for appropriate assessment screening

An appropriate assessment screening provides the information necessary to fulfil the requirements of Article 6 of the EU Habitats Directive 1992 and Regulation 42 of the (Birds and Natural Habitats) Regulations 2011 in determining the potential impacts on European sites from the proposal. The European Directive 92/43/EEC (The Habitats Directive) was transposed into Irish law by the European Communities (Natural Habitats) Regulations 1997 and European Communities (Birds and Natural Habitats) Regulations 2011 (Habitats Regulations). Regulation 42(1) of the 2011 Regulations 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 Sites".*

If, following the screening process, a likely significant effect is predicted or cannot be ruled out under Regulation 42(6), an appropriate assessment is required in order to determine the potential for impact on the integrity of a European site. In the event of a negative assessment in terms of an adverse effect on site integrity, a proposal can only be consented in the absence of feasible alternatives and for "Imperative Reasons of Overriding Public Interest" (IROPI). In such cases, compensatory measures to ensure the integrity of the European sites are maintained are required.

The Guidance document on Article 6(4) of the Habitats Directive states that:

> *"Any uncertainty over the precise nature and/or magnitude of the adverse effects should be thoroughly tested. Where appropriate, a precautionary approach should be adopted, and the assessment of adverse effect based on a worse-case scenario.[1]"*

Recent case law[2] has demonstrated that measures which are intended to avoid or reduce the harmful effects of the proposed development on any relevant European site, i.e., mitigation (such as pollution control measures), cannot be considered at the screening stage of the appropriate assessment process.

Part XAB of the Planning Development Act, 2000 (as amended) states under appropriate assessment in Section 177U (4) that:

(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, 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 development, individually or in combination with other plans or projects, will have a significant effect on a European site.

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1 (European Commission, 2007) http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf (Accessed January 2024)

2 People Over Wind and Peter Sweetman v Coillte Teoranta (C-323/17); and, Heather Hill Management Company clg v An Bord Pleanála [2019] IEHC 450.

And in Section 177U (5) that:

(5) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, 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 development, individually or in combination with other plans or projects, will have a significant effect on a European site.

Also, in Part XAB of the Planning Development Act, 2000 (as amended) states under Natura impact report and NIS in Section 177T (1) and (2) 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 F781 [European site], in view of the conservation objectives of the site or sites.

(1) (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 one F781 [European site], in view of the conservation objectives of the site or sites.

And in Section 2 which states that:

(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 F781 [European site] in view of the conservation objectives of the site or sites[3].

1.2.2. Requirement for a NIS

The appropriate assessment test assesses whether, in view of best scientific knowledge and applying the precautionary principle, and in light of the conservation objectives of the relevant Natura 2000 sites, the proposed project, either alone or in-combination with other plans or projects, may adversely affect the integrity of any Natura 2000 sites.

If, following the screening process, a potential significant effect is predicted or cannot be ruled out under Regulation 42(6), an appropriate assessment is required in order to determine the potential for impact on integrity of a Natura 2000 site.

Regulation 42 (9) of the 2011 Habitats Regulations states:

Where a public authority is required to conduct an appropriate assessment pursuant to *paragraph (6)* in relation to a plan or project that it proposes to undertake or adopt, it shall:

- Prepare a NIS
- Compile any other evidence including, but not limited to, scientific evidence that is required for the purposes of the appropriate assessment

3 Planning and Development Act 2000 (as amended) https://revisedacts.lawreform.ie/eli/2000/act/30/revised/en/html (Accessed March 2024)

- Submit a NIS together with evidence compiled under *subparagraph (b)* to the Minister not later than six weeks before it proposes to adopt or undertake the plan or project to which the NIS and evidence relates.

Section 177AE of the Planning and Development Acts 2000 to 2001 (as inserted by section 57 of the Planning and Development (Amendment) Act 2010) set out the appropriate procedure for Local Authority projects with potential to impact on Natura 2000 sites. This requires that, where an appropriate assessment is required in respect of a development by a local authority that is a planning authority, they will prepare, or cause to be prepared, a NIS. The NIS shall then be provided to An Bord Pleanála for them to undertake an appropriate assessment.

With the screening for appropriate assessment having determined that potential significant effects on Natura 2000 sites could not be ruled out (see Section 3 of this report), a NIS as required under Regulation 42(9) of the European Communities (Birds and Natural habitats) Regulations 2011. This NIS provides an assessment of the proposal considering potential impacts on QIs within Natura 2000 sites and provides mitigation proposals to avoid impacts on the integrity of Natura 2000 sites. This allows for an audit trail through Article 6 of the EU Habitats Directive to facilitate an appropriate assessment by a competent authority.

1.3. Structure/layout of the report

This NIS provides the information necessary for the Competent Authority, in this case Sligo County Council, to undertake an appropriate assessment of the proposal. The report sections, paragraphs and tables relate in sequence to the process of assessing the potential impact of the project in the context of sequential requirements of Article 6 of the EU Habitats Directive.

1.4. Main sources of information

The following information sources were consulted:

- Department of Environment, Heritage and Local Government (DoEHLG, 2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities
- European Community Habitats Directive (92/43/EEC) – The Habitats Directive
- European Communities (Natural Habitats) Regulations 1997
- European Commission (2021) Commission Notice - Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC
- European Commission (2021) ANNEX to the Commission Notice - Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC
- European Commission Environment DG (2001). 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
- Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC
- Environmental Protection Agency (EPA) Maps[4]
- National Parks and Wildlife Services online MapViewer[5]

4 EPA Maps. Available at: https://gis.epa.ie/EPAMaps/ [Accessed March 2024].
5 NPWS Map Viewer. Available at: http://webgis.npws.ie/npwsviewer/ [Accessed March 2024].

- National Parks and Wildlife Service's data (downloaded GIS datafiles[6])
- Office of the Planning Regulator (OPR) (2021) OPR Practice Note PN01 Appropriate Assessment Screening for Development Management
- Sligo County Council Planning Portal[7].

Woodrow carried out a survey within, and adjacent to, the Site Boundary on 10 January 2024. This included a habitat walkover, otter survey, terrestrial invasive species survey and surveys to identify any potential source-pathway-receptor linkages between the proposed development site and any Qualifying Interest (QI) features of identified European sites.

1.5. Methodology of Surveys

Field surveys were carried out on the 10 January 2024. The main findings of these surveys are summarised below.

Habitats

Habitats at the sites were classified according to the standard methodology set out in the Heritage Council publication (Fossitt, 2000) and cross referenced for correspondence with Annex I habitats.

The proposed site and its environs correspond to the Fossitt habitats: depositing/lowland river (FW2), improved agricultural grasslands (GA1), scrub (WS1) and buildings and artificial surfaces (BL3).

No EU Annex I habitats were recorded onsite at any of the proposed working locations.

Otter

An otter survey was conducted at both proposed working locations within the Swinford and Glore watercourses. The otter survey was carried out as per TII (2008) guidelines for the *'Treatment of Otters prior to the Construction of National Road Schemes'* and involved surveying surface water features (e.g. rivers, streams, drains) up to 150m above and below the proposed works. Otter surveying involved the following:

- Walking the survey area systematically and checking all suitable areas (e.g. watercourses, riparian areas, under bridges) for otter activity, and identifying potential holt locations (otter burrows).
- Recording any signs of otter, including spraints (i.e. faeces), anal jelly, slides (i.e. access points to river) and footprints.
- Recording trails and determining whether they may lead to holt locations.

Additional guidance used for otter surveying was that of Chanin (2003).

Surveys resulted in signs of otter within the aquatic zone adjacent the proposed site boundary. Evidence such as otter spraint was detected in areas along the aquatic zone. This evidence suggests that otter is foraging in the area along the banks of the Garvogue River. Although evidence of foraging otter were encountered, no otter holts or resting places were encountered during the surveys. There appears to be a healthy otter population in the Sligo area, with otter being known to forage within the Garavougue River and have been noted on several occasions in recent years *(pers. comm. Staff at Woodrow)*.

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6 NPWS Maps and Data. Available at: https://www.npws.ie/maps-and-data [Accessed March 2024].
7 Sligo County Council Planning Portal. Available at: http://www.sligococo.ie/planning/SearchPlanningApplications/OnlinePlanningTools/ [Accessed March 2024].

Invasive species

No terrestrial invasive species were recorded within or in close proximity to the site boundary during the field survey.

2. DESCRIPTION AND FEATURES OF THE PROJECT AND AREA

2.1. Location

The Site is located on the grounds of the Sligo Grammar School. It is situated immediately east of Sligo town centre along the banks of the Garvogue River. The Site can be found at ITM Grid Reference: (X: 569844, Y: 836050). The Site location (survey area) in the context of the wider landscape as well as an aerial overview of the site is presented in Figure 1 and Figure 2.

2.2. Description of the proposal

The proposed works include the construction of a single lane access road with all associated works to link the south-eastern boundary of the Sligo Grammar School to the Garvogue approach road. The single lane road will be 6m wide to carry road traffic and a 3m footpath/cycle lane will also be constructed alongside this road, on the Garvogue River side. Figure 3 illustrates the project proposal.

2.3. Description of the area

The proposed site is within an area of grassland, with also pockets of scrub habitat throughout. A lowland depositing river lies adjacent to the proposed construction site.

2.4. Management and current use of the site

The site is currently occasionally used to hold some livestock such as horses or cattle.

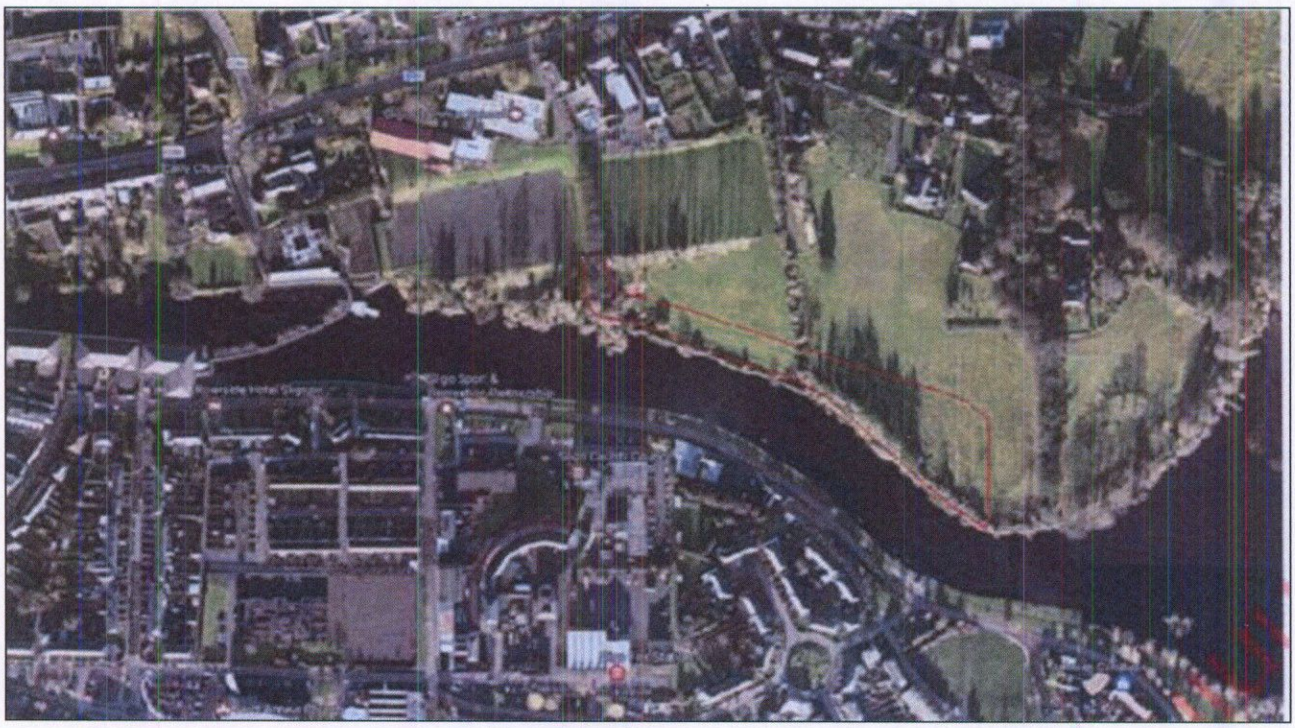

Figure 1 – Aerial overview of the proposed site with redline boundary (Source: Vincent Hannon Architects - Construction Environmental Management Plan).

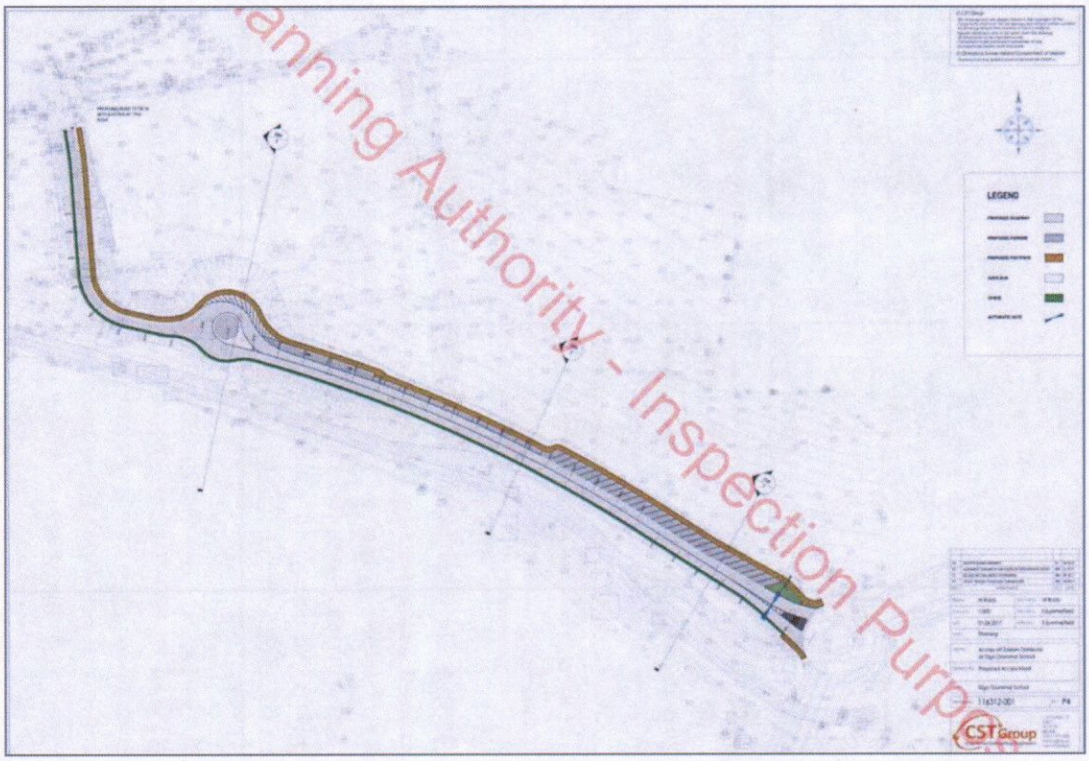

Figure 2 – Proposed Site Layout (Source: Envest, 2017, Screening for Appropriate Assessment report for the proposed Sligo Grammar School Access Road).

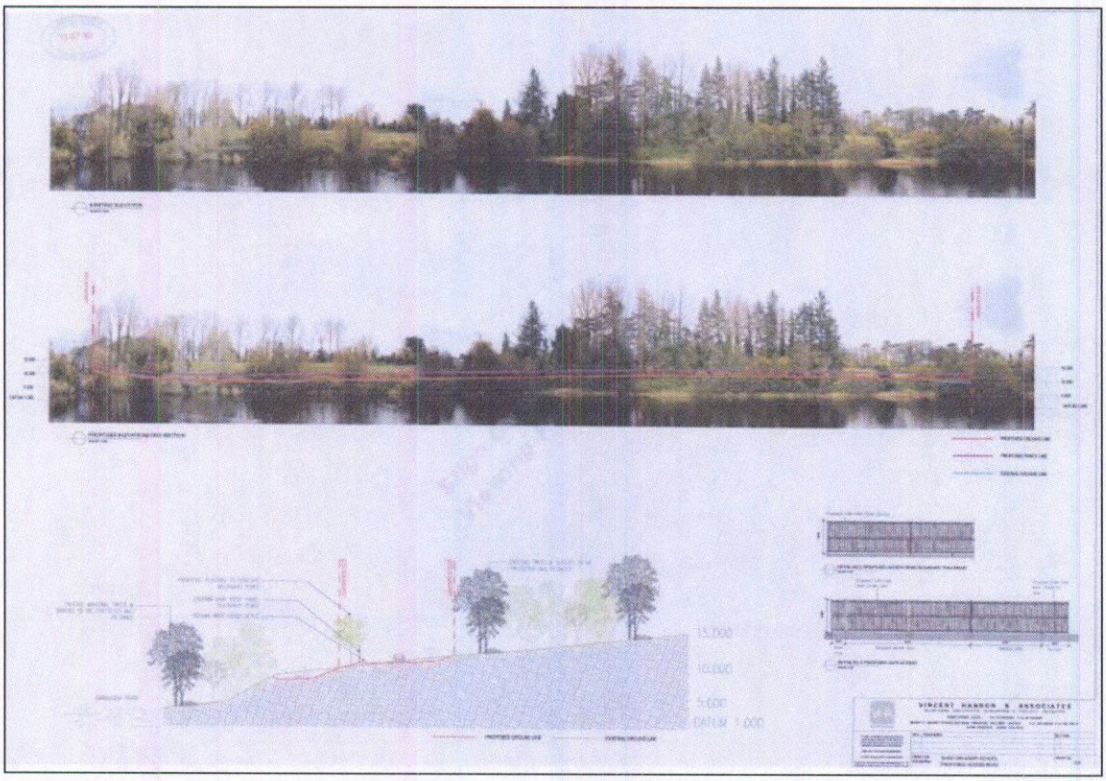

Figure 3 – Elevation drawing of proposed road (Source: Envest, 2017).

3. CONCLUSIONS OF SCREENING ASSESSMENT

The appropriate assessment stage one screening report for this proposal is provided in Appendix I.

The proposal includes the construction of a single lane road with all associated works to link the south eastern boundary of the Sligo Grammar School to the Garvogue approach road.

On the basis of the screening assessment and when applying the 'precautionary principle', it has been shown that there is the potential for a significant effect upon the:

- Lough Gill SAC,
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC, and
- Cummeen Strand SPA.

Qualifying Interests from the European sites which are excluded from the assessment due to them not been present within the Zone of Influence or that there is no potential for impact from the proposed works, are:

- Lough Gill SAC
    - Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
    - Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0]
    - Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) [91E0]
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC
    - Estuaries [1130]
    - Mudflats and sandflats not covered by seawater at low tide [1140]
    - Embryonic shifting dunes [2110]
    - Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]
    - Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]
    - *Juniperus communis* formations on heaths or calcareous grasslands [5130]
    - Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
    - Petrifying springs with tufa formation (Cratoneurion) [7220]
    - *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014]
    - *Phoca vitulina* (Harbour Seal) [1365]

This NIS will ascertain if there could be an adverse effect upon the integrity of the European sites and they aforementioned QIs as a result of the proposed works, either alone or in-combination with other plans or projects. Mitigation measures will be detailed in order to ensure no adverse impacts will occur on these European sites.

Sections 5 to 8 below provide the information to inform the Stage 2 AA, which is undertaken by the Competent Authority.

4. DESCRIPTION OF EUROPEAN SITES WITHIN THE POTENTIAL ZONE OF INFLUENCE OF THE PROPOSAL

The following section provides information on the European sites in the vicinity of the proposed works which have the potential to be within the zone of influence of the proposal.

The appropriate assessment screening can be found in Appendix I of this report along with the conclusion. On the basis of the screening assessment and when applying the 'precautionary principle', it has been shown that the potential for a significant effect upon three European sites which could not be ruled out at this stage.

The Qualifying Interests that relate to each site, which have the potential to be impacted are aquatic species which could be present within the zone of influence, and these are:

- Lough Gill SAC [001976]
    - Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]
    - *Austropotamobius pallipes* (White-clawed Crayfish) [1092]
    - *Petromyzon marinus* (Sea Lamprey) [1095]
    - *Lampetra planeri* (Brook Lamprey) [1096]
    - *Lampetra fluviatilis* (River Lamprey) [1099]
    - *Salmo salar* (Salmon) [1106]
    - *Lutra lutra* (Otter) [1355]
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]
    - *Petromyzon marinus* (Sea Lamprey) [1095]
    - *Lampetra fluviatilis* (River Lamprey) [1099]
- Cummeen Strand SPA [004035]
    - Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]
    - Oystercatcher (*Haematopus ostralegus*) [A130]
    - Redshank (*Tringa totanus*) [A162]
    - Wetland and Waterbirds [A999]

This NIS assesses the European site and the QIs identified within the AA Screening as needing further consideration. This is in order to assess whether the proposed works has the potential to have an adverse impact upon such features therefore identifying if the proposal has the potential to have an adverse effect upon the integrity of the European site.

4.1. European sites and QIs requiring further assessment during Stage 2 AA

Table 2 below details the European site for which the proposal has the potential to result in significant effects and their QIs.

Table 2: European sites and QIs being assessed further in the NIS.

Lough Gill SAC (Site Code : 001976)
Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]
Austropotamobius pallipes (White-clawed crayfish) [1092]
Petromyzon marinus (Sea lamprey) [1095]
Lampetra planeri (Brook lamprey) [1096]
Lampetra fluviatilis (River lamprey) [1099]
Salmo salar (Salmon) [1106]
Lutra lutra (Otter) [1355]

* = A priority habitat – habitats which are in danger of disappearing within the EU territory, are highlighted with an asterisk.

Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code : 000627)
Petromyzon marinus (Sea Lamprey) [1095]
Lampetra fluviatilis (River Lamprey) [1099]

Cummeen Strand SPA (Site Code: 004035)
Light-bellied Brent goose *(Branta bernicla hrota)* [A046]
Oystercatcher *(Haematopus ostralegus)* [A130]
Redshank *(Tringa totanus)* [A162]
Wetland and Waterbirds [A999]

4.2. Description of European sites being assessed further

Lough Gill SAC (Site Code: 001976)

"This site includes Lough Gill, Doon Lough to the north-east, the Bonet River (as far as, but not including, Glenade Lough), and a stretch of the Owenmore River near Manorhamilton in Co. Leitrim. Lough Gill itself, 2 km east of Sligo town, lies at a geological junction of ancient metamorphic rocks which produce acid groundwater, and limestone which dissolves in the groundwater"[8].

The conservation objective of each QI within the Lough Gill SAC is:

"To restore/maintain the favourable conservation condition of each QI in the Lough Gill SAC, which is defined by the list of attributes and targets found within the detailed Site-Specific Conservation Objectives document"[9].

Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627)

"This large coastal site extends from Cullamore in the north-west to Killaspug in the south-west, and from Sligo town in the south-east to Drumcliff village in the northeast. It encompasses two large, shallow bays, Drumcliff Bay and Sligo Harbour, and both Ardboline and Horse Island. Sand dunes and sand hills at Rosses Point, Killaspug, Yellow Strand and Coney Island are included, as are grasslands at Ballintemple and Ballygilgan (Lissadell), along with a variety of other habitats such as woodland, saltmarsh, sandy beaches, boulder beaches, shingle, fen, freshwater marshes, rocky sea cliffs and lakes. The site is largely underlain by Carboniferous limestone, but acidic rocks are also found on the Rosses Point peninsula. At Serpent Rock in the north-western section of the site the most complete section of the northwestern Carboniferous strata is exposed. Here are found an excellent series of fossilised corals which, in some strata, stand out from the rock matrix"[10].

The conservation objective of each QI within the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is:

"To restore/maintain the favourable conservation condition of each QI in the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC, which is defined by the list of attributes and targets found within the detailed Site Specific Conservation Objectives document"[11].

Cummeen Strand SPA (Site Code: 004035)

"Cummeen Strand is a large shallow bay stretching from Sligo Town westwards to Coney Island. It is one of three estuarine bays within Sligo Bay and is situated between Drumcliff Bay to the north and Ballysadare Bay to the south. The Garavogue River flows into the bay and forms a permanent channel. At low tide, extensive sand and mud flats are exposed. These support a diverse macro-invertebrate fauna which provides the main food supply for the wintering waterfowl. Invertebrate species such as Lugworm (Arenicola marina), Ragworm (Hediste diversicolor), Cockles (Cerastoderma edule), Sand Mason (Lanice conchilega), Baltic Tellin (Macoma balthica), Spire Shell (Hydrobia ulvae)

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8 NPWS (2016) Lough Gill SAC – Site Synopsis https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY001976.pdf (Accessed: January 2024)

9 NPWS (2016) Lough Gill SAC – Conservation Objectives https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001976.pdf (Accessed: January 2024)

10 NPWS (2016) Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC – Site Synopsis https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY000627.pdf (Accessed: January 2024)

11 NPWS (2016) Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC – Conservation Objectives https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000627.pdf (Accessed: January 2024)

and Mussels (Mytilus edulis) are frequent. Of particular note is the presence of eelgrass (Zostera noltii and Z. angustifolia) beds, which provide a valuable food stock for herbivorous wildfowl. The estuarine and intertidal flat habitats are of conservation significance and are listed on Annex I of the E.U. Habitats Directive. Areas of salt marsh fringe the bay in places and provide roosting sites for birds during the high tide periods. Sand dunes occur at Killaspug Point and Coney Island, with a shingle spit at Standalone Point near Sligo Town"[12].

The conservation objective of each QI within the Cummeen Strand SPA is:

"To maintain the favourable conservation condition of each QI in the Cummeen Strand SPA, which is defined by the list of attributes and targets found within the detailed Site-Specific Conservation Objectives document"[13].

5. ASSESSMENT OF POTENTIAL IMPACTS

This section explores the potential impacts on the Qualifying Interests and examines the significance of the impacts on them, taking account of the nature of the proposed works and the sensitivity of the features in relation to the project and the proposed works site. This section details the main potential impacts in the context of potential for adverse impact on the integrity of the site. This assessment takes account of EU Guidance such as "Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/CEE". This includes the following text:

> *"The 'integrity of the site' has been usefully defined as 'the coherence of the site's ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified'.*
>
> *A site can be described as having a high degree of integrity where the inherent potential for meeting site conservation objectives is realised, the capacity for self-repair and self-renewal under dynamic conditions is maintained, and a minimum of external management support is required.*
>
> *When looking at the 'integrity of the site, it is therefore important to take into account a range of factors, including the possibility of effects manifesting themselves in the short, medium and long-term.*
>
> *The integrity of the site involves its ecological functions. The decision as to whether it is adversely affected should focus on and be limited to the site's conservation objectives."*

Where an impact is identified, the need for appropriate mitigation is highlighted (and presented in Section 7 below) to avoid any potential for an adverse effect on any QI.

The assessment of likely impacts is dictated by the following:

- No QI habitats are present within the working areas/access routes and so there is no potential for direct impacts such as loss/destruction of habitats for which the site is designated.
- No instream works are required or proposed as part of these works and so there is no potential for direct impacts on aquatic species for which the site is designated for and there is also no potential for direct impacts on aquatic habitats for which these species are dependent on.

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12 NPWS (2016) Cummeen Strand SPA – Site Synopsis https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY004035.pdf (Accessed: January 2024)

13 NPWS (2016) Cummeen Strand SPA – Conservation Objectives https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004035.pdf (Accessed: January 2024)

- No signs of otter holts were detected during surveys and so there is no potential for direct impacts on otter to occur from the proposed works., however there is the potential for direct impacts on foraging otter during the operational phase of the access road due to mortality if otter can access the road.
- No Special Scientific Interest (SCI) bird species were identified within the proposed working area and so there is no potential for direct or indirect disturbance impacts on these species.
- According to the Cummeen strand roost location map which forms part of the supporting documentation of the conservation objectives of the SPA[14], the closest recorded roosting location for SCI bird species associated with the SPA is located approximately 1km west of the proposed works, due to the distance between this known roost and the proposed site along with the fact that the site is unlikely to be used by SCI bird species due to its connectivity to an operational school means there is no potential for direct or indirect disturbance impacts on these species.
- Measures are required to ensure no direct operational impacts on otter can occur, also indirect impacts such as negative water quality impacts have the potential to occur and to ensure no potential for the introduction of invasive species during the construction phase.

Potential Indirect impacts on listed QIs of the Lough Gill SAC/ Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC

Potential indirect impacts related to the proposed works include:

- Negative impacts on water quality with potential indirect impacts on listed aquatic QIs such as salmon, white-clawed crayfish, lamprey species and otter.
- Introduction and spread of invasive species within the working areas.

Potential Indirect impacts on listed SCI bird species of the Cummeen Strand SPA

Potential indirect impacts related to the proposed works include:

- Negative impacts on water quality with potential indirect impacts on listed SCI bird species.

Water quality (indirect impacts)

There is the potential for negative effects on water quality such as the release of suspended solids or chemical substances due to the proposed works in close proximity to the aquatic zone.

Increased suspended solid concentrations in rivers can affect the feeding and health of individual species through increased turbidity (inhibiting respiration through gills) and increased siltation affecting composition of riverbed substrate (reducing fry survival) and affecting spawning beds. Suspended solids often hold nutrients such as phosphorus or hydrocarbons that can result in eutrophication and reduced oxygen levels (with high oxygen levels being important for all life stages of Atlantic salmon for example).

Densities of different life stages of salmon, particularly fry and parr, vary within a river catchment, limited often by the availability of suitable substrates. Young parr are territorial and defend small sections of the river channel used for intercepting edible particles in the current (Kalleberg, 1958). Habitat availability and quality is intrinsically linked with survival rates and recruitment to smolt stages. Therefore, small amounts of debris entering a section of river important for vulnerable life

14 NPWS (2013) Cummeen Strand Special Protection Area (Site Code 4035) ≡ Conservation Objectives Supporting Document VERSION 1 https://www.npws.ie/sites/default/files/publications/pdf/004035_Cummeen%20Strand%20SPA%20Supporting%20Doc_V1.pdf (Accessed: January 2024)

stages of salmon can have deleterious impacts, even in the short-term on juvenile survival and habitat utility. Stages of lamprey life cycles are tied to gravel habitats also, with habitat smothering from high suspended solids potentially also affecting these species.

Release of hydrocarbons as a result of such events as fuel spills have the potential to impact on water quality as a result of reduced oxygen, thereby affecting the salmon populations that required good oxygen supplies. They are known to bioaccumulate in *Salmonids* (e.g., McCain *et al.* 1990), with Atlantic salmon known to be physically affected by short term exposure leading to loss of condition and are also known to avoid areas with hydrocarbons (e.g., Maynard and Weber 1981) leading to the effective loss of habitat or migration routes for the species.

The release of even small amounts of hydrocarbons into the watercourses adjacent to the site, has the potential to result in significant impact on the downstream populations of salmon, white clawed crayfish, lamprey spp. and otter.

The impact on otter prey availability may occur due to the potential water quality impacts already stated. Negative impacts on water quality would lessen the availability of aquatic species such as fish and aquatic invertebrates for otters to feed on.

Negative changes in water quality has the potential to impact SCI bird species connected with the Cummeen Strand SPA. Thes bird species are water dependant and any discharges of polluting matter to waters would have a detrimental impact on these species. Waders such as Redshank and Oystercatchers feed on aquatic invertebrates and molluscs as part of their diet.

It is therefore concluded that the proposal, without mitigation, has significant potential to result in potential negative water quality impacts.

Invasive species (indirect impacts)

Machinery and equipment have the potential to bring invasive species onto site during construction. Invasive species such as Japanese knotweed if introduced into the riparian zone of a watercourse can destabilise river banks and create soil bank erosion and in turn cause heavy loads of suspended solids to enter rivers.

5.1 Summary of Potential Impacts

Potential for construction and operational related indirect impacts from the proposed works include potential negative water quality impacts. Mitigation is set out in Section 7 to address all potential impacts associated with the proposed works and to mitigate against any significant impacts on these species of concern due to the proposed works.

6. POTENTIAL IN-COMBINATION EFFECTS

6.1. Context

Article 6 of the EU Habitats Directive and Regulation 28 of the European Communities (Natural Habitats) Regulations 2011 state that any plan or project that may, either alone or in-combination with other activities, plans or projects, significantly affect a European site should be the subject of an appropriate assessment. The assessment of in-combination impacts is therefore an important part of the assessment process.

In-combination impacts can be a particular issue when proposals have an impact on European sites as a result of factors such as disturbance or pollution, and when other adjacent proposals also have an impact, the result can have an incremental affect resulting in a significant impact on the European site.

6.2. Additive/incremental impacts

Additive incremental impacts consider multiple activities/projects (each with potentially insignificant effects) but which added together can give rise to a significant effect due to their proximity in time and space (CIEEM, 2018).

The proposed works run in close proximity to urban and residential settings and so there is the potential for impacts on water quality due to urban and residential runoff.

It is proposed that this road will connect with the proposed eastern Garvogue bridge which it to be constructed in the future. This project will undergo the appropriate assessment process and ultimately a NIS will be required to ensure no significant impacts can occur on European sites to which this project also is assessing and so it is therefore concluded that there are no potential additive impacts with respect to any other projects.

6.3. Associated/connected developments

Associated/connected developments are those developments which may result as a consequence of the current planning application process (CIEEM, 2018).

The future project to construct the eastern Garavogue bridge to which this road will connect to has been identified as an associated development, however with the current project identifying potential negative water quality impacts which are to be mitigated against and the future Garvogue bridge to undergo the appropriate assessment process also.

Taking this into account, it is considered that all in-combination impacts have been considered here, and any potential for in-combination impacts have been mitigated for as part of the current proposed project.

7. MITIGATION OF EFFECTS

This section sets out mitigation required to address potential effects (identified in Section 5) that may arise from the proposed works on any European site. The mitigation set out below details all that is required to ensure the proposal will not result in adverse effects on the integrity of any European site.

7.1 Construction Environmental Management Plan (CEMP)

The appointed contractor will be required to draft a CEMP to cover all aspects of the contract and to include a waste management and pollution prevention plan within this CEMP. The CEMP will incorporate all mitigation from within this report and also from the previously submitted Outline CEMP.

7.2 Ecological supervision

An onsite Ecological Clerk of Works (ECoW) will be employed to oversee all aspects of the works and to give direction. The ECoW role will be as follows:

- The ECoW will give a comprehensive Toolbox talk to contractors and sub-contractors before the proposed works begins on the environmental sensitivities and the mitigation measures as prescribed within this report and the CEMP to be strictly adhered to during the works.
- The ECoW will attend site for the mobilisation and sit set-up to ensure all mitigation measures are implemented at the beginning of the project.
- Ther ECoW will visit site intermittently to ensure the efficacy of mitigation measures as prescribed within this report and the CEMP.

7.3 Mitigation for aquatic QIs from indirect impacts (negative water quality due to siltation)

To ensure no negative water quality impacts can arise the following measures are required:

- A buffer zone of at least 30m between the site boundary and the aquatic zone where no access is granted during the works to ensure no potential for impact on the aquatic zone during construction.
- A double layer of silt fencing to be erected along the entire site boundary between the aquatic zone and the work site. Ensure silt fencing is buried and held up with stakes to ensure efficacy.
- No direct dewatering to the river. All dewatering to be directed to vegetation through a silt sock or a silt buster to allow the removal of suspended solids.
- Proposed works to follow guidance from Inland Fisheries Ireland (2016) Guidelines on Protection of Fisheries During Construction works in and Adjacent to Waters and Inland Fisheries Ireland Guidelines on Planning for Watercourses in the Urban Environment.

7.4 Mitigation for aquatic QIs from indirect impacts (negative water quality due to chemical contamination)

To ensure no negative water quality impacts can arise the following measures are required:

- No refuelling of machinery or equipment in close proximity to the river. All refuelling to take place on a hard standing area at a minimum of 50m from the river.
- A designated COSSH store at a minimum of 50m from the aquatic zone to be situated onsite for the storage of chemicals.
- Drip trays, spill kits and a hydrocarbon river boom to be available for use onsite.
- No concrete washout onsite, lorries to return to depot to washout or a temporary washout lined skip should be made available and placed on a hardstanding area at minimum 50m from the river.
- Hydrocarbon interceptors to be within the road drainage systems to prevent the discharge of hydrocarbons to the environment from road run off.
- Sustainable Urban Drainage (SUDS) to be part of the operational design to include swales and attenuation ponds for treatment of silt laden road run off.

7.5 Mitigation for potential direct impact on foraging otter during the operational stage of the access road

Mammal-proof fencing https://www.tiipublications.ie/library/CC-SCD-00324-01.pdf as specified within the TII guidance to be erected along the entire boundary of the road between the aquatic zone and the access road. This will prevent foraging otter from gaining access to the operational road.

7.6 Mitigation to prevent the spread of invasive species

All machinery arriving to site must be clean and free from any adherent material. All machinery requiring wash downs should be carried out prior to arrival onsite to ensure no discharge od wash water can occur at the proposed working location. Contractors to ensure that machinery being used for the proposed works are not contaminated from invasive species while working on other sites that may have invasive species present.

8. CONCLUSIONS

As described within this report, robust and scientific data collation, analysis and interpretation of desk based research and field survey data have been conducted by Woodrow in order to facilitate the appropriate assessment for this project, which will be carried out by Sligo County Council as the Competent Authority in this instance.

The proposed works is within the boundary of Lough Gill SAC. This SAC supports several Annex II aquatic QI species. Unmitigated, the potential impacts on these species (namely; white-clawed crayfish, salmon, lamprey species and otter) as a result of the proposal could include indirect impacts such as water pollution.

Other European sites within the zone of influence include the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and Cummeen Strand SPA. The OPR guidance states that the zone of influences is:

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).

Measures have been proposed to minimise the risk of impacts on species of concern. Measures such as the prevention of the release of suspended solids and chemicals to the watercourse. Along with these measures, the supervision of works by an Ecological Clerk of Works (ECoW) will ensure no potential for impacts on the aforementioned qualifying interests for these sites.

The contractor is required to submit a site-specific Construction Environmental Management Plan (CEMP) before the works commence to ensure all methods of the proposed works include all the mitigation measures outlined within this report.

This NIS has examined whether, in view of best scientific knowledge and applying the precautionary principle, the proposed project either individually, or in-combination with other plans or projects, may have an adverse effect on the integrity of any European site.

This NIS has identified mitigation measures to avoid and minimise these effects so that the structure and functions of any European sites are not adversely affected, thus demonstrating that the proposal can be mitigated to avoid an adverse impact.

This NIS concludes that if the mitigation measures specified for proposed works are implemented, as detailed in Section 7, the proposal will not, in the light of best scientific knowledge, adversely affect the integrity of any European sites, either alone or in-combination with any other plans or projects.

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APPENDIX I - SCREENING FOR APPROPRIATE ASSESSMENT

Introduction

The following section provides information on the European sites (also known as Natura 2000 sites) in the vicinity of the proposed works which have the potential to be within the 'zone of influence' of the proposal.

European sites within the Zone of Influence

The following section provides information on the European sites in the vicinity of the proposed works which have the potential to be within the zone of influence of the proposal (all European sites within 15 km of the proposed works are shown in Figures 3 and 4).

The potential impacts on designated sites are dependent on the location, topography and environment at the development site, the nature of impacts arising, the sensitivity of receptors and the causal links and conduits, rather than simply the distance from source. In many cases the potential source-pathway-receptor linkages are within the immediate vicinity of the Application Site (<1 km) (for example noise and human disturbance), but the distances involved may be much greater if there is a significant and direct hydrological pathway e.g., a main river which flows directly through the application site, or a QI/SCI species which ranges over large areas many kilometres from a European site for which they are a listed feature of interest.

The Steps to follow when identifying which European site may be affected by a plan or project are available from the European Commission Guidance (2021) Commission Notice - Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. In particular, the assessment should identify:

- Any European sites geographically overlapping with any of the actions or aspects of the plan or project in any of its phases, or adjacent to them;
- Any Natura 2000 sites within the likely zone of influence of the plan or project. Natura 2000 sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, including as regards the use of natural resources (e.g., water) and various types of waste, discharge or emissions of substances or energy;
- Natura 2000 sites in the surroundings of the plan or project (or at some distance) which host fauna that can move to the project area and then suffer mortality or other impacts (e.g., loss of feeding areas, reduction of home range); and,
- Natura 2000 sites whose connectivity or ecological continuity can be affected by the plan or project.

European sites with potential pathways for impacts are identified in order to establish the zone of influence of the proposal. These can then be assessed based on factors such as proximity to the proposed works, the Qualifying Interests (QIs) / Special Conservation Interests (SCIs) of the European sites (and the species or habitats upon which these rely), and their conservation status. Further information on this is also available within the Office of the Planning Regulator (OPR) (2021) OPR Practice Note PN01 Appropriate Assessment Screening for Development Management.
On consideration of the scale, design and location of these works, the Zone of Influence of this proposal is not considered to be greater than where the proposed works are actually taking place within the European sites.

European sites within the proposal area and those within the potential zone of influence are shown in Table 1 below. Figure 1 illustrates the proximity of these European sites to the proposed works, and potential connectivity. Figure 2 illustrates the site boundary in context to the Garavogue river.

Figure 1 – Proposed working area and European sites

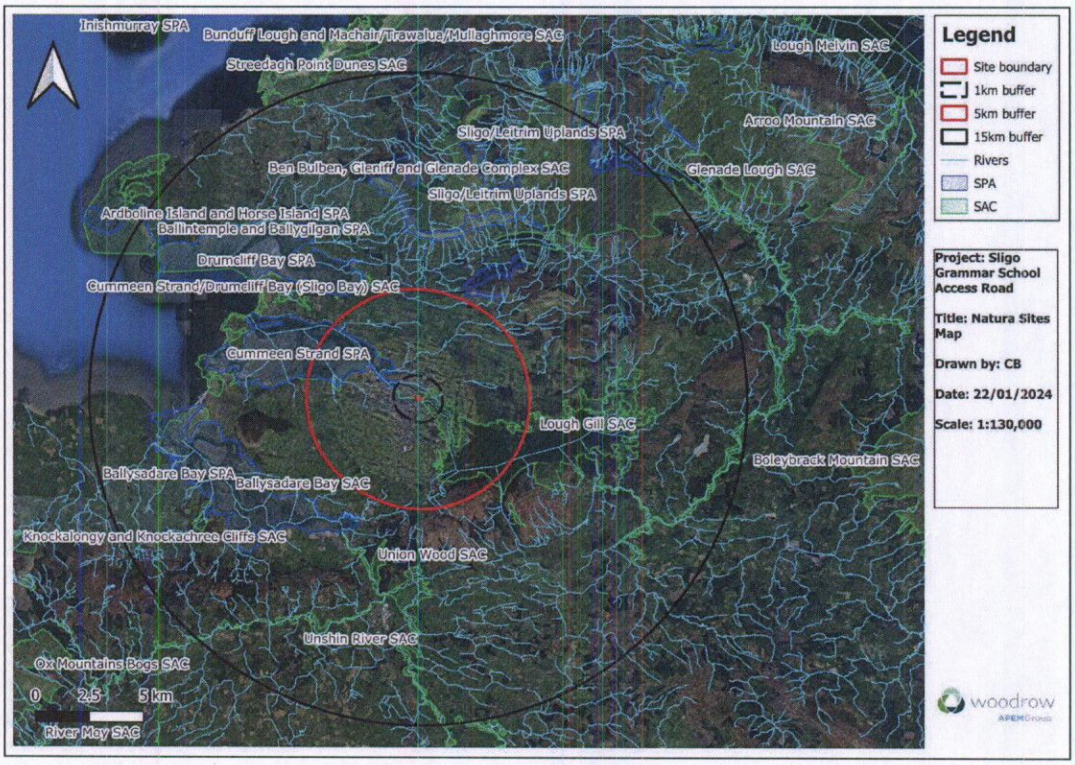

Figure 2 – Site boundary in context to the Garavogue river.

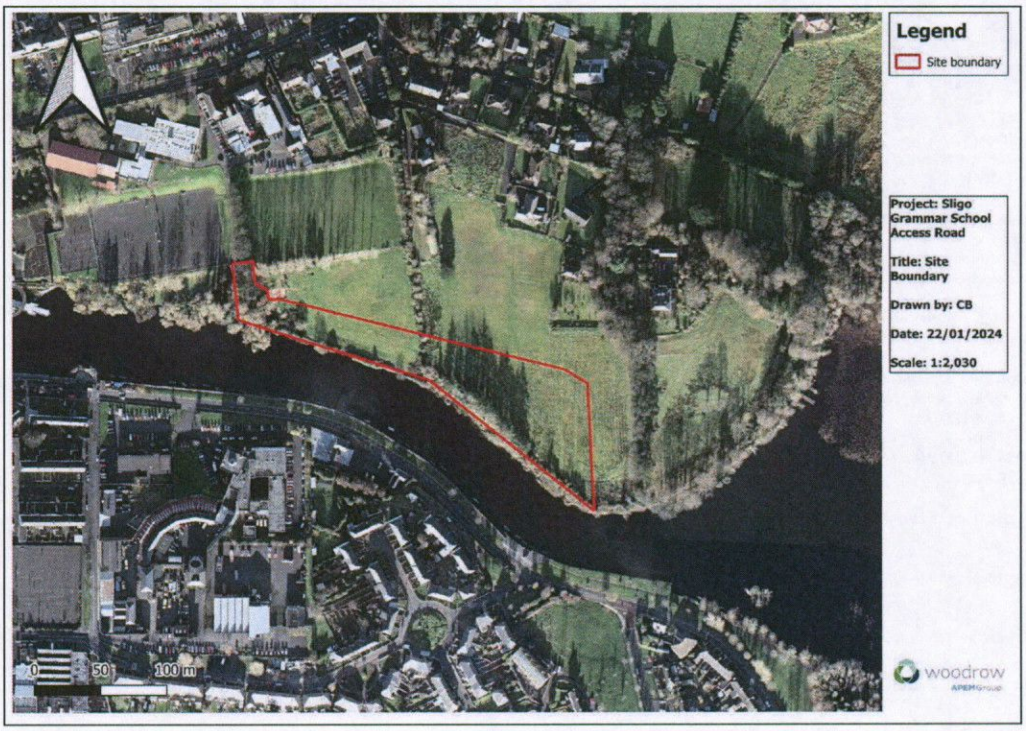

Table 1 Designated sites with potential connectivity to the proposed development.

Internationally designated sites	Main features of interest ** = A priority habitat – habitats which are in danger of disappearing within the EU territory, are highlighted with an asterisk*	Distance from the Application Site	Potential Site- Pathway-Receptor Linkage via proximity of site, and/or surface water connectivity?[15]
Special Areas of Conservation (SAC)			
Lough Gill SAC (Site Code : 001976)	**Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]** **Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]** **Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]** **Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]** ***Austropotamobius pallipes* (White-clawed Crayfish) [1092]** ***Petromyzon marinus* (Sea Lamprey) [1095]** ***Lampetra planeri* (Brook Lamprey) [1096]** ***Lampetra fluviatilis* (River Lamprey) [1099]**	**The proposed works is located within this SAC**	**Yes – a potential direct source-pathway-receptor linkage exists with this site. The proposed works is hydrologically connected to this European site.**

15 EPA Maps https://gis.epa.ie/EPAMaps/ provides online mapping for rivers, streams, flow direction arrows, ground water vulnerability layers and designated sites for Ireland and parts Northern Ireland etc. – This website was used to assess the potential for connectivity of watercourses and ground water from the proposal to Natura 2000 sites.

Internationally designated sites	Main features of interest ** = A priority habitat – habitats which are in danger of disappearing within the EU territory, are highlighted with an asterisk*	Distance from the Application Site	Potential Site- Pathway-Receptor Linkage via proximity of site, and/or surface water connectivity?[15]
	Salmo salar (Salmon) [1106] *Lutra lutra* (Otter) [1355]		
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code : 000627)	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Juniperus communis formations on heaths or calcareous grasslands [5130] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Petrifying springs with tufa formation (Cratoneurion) [7220] *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014] *Petromyzon marinus* (Sea Lamprey) [1095]	*c.* 0.5 km	Yes – a potential direct source-pathway-receptor linkage exists with this site. The proposed works is hydrologically connected to this European site.

Internationally designated sites	Main features of interest ** = A priority habitat – habitats which are in danger of disappearing within the EU territory, are highlighted with an asterisk*	Distance from the Application Site	Potential Site- Pathway-Receptor Linkage via proximity of site, and/or surface water connectivity?[15]
	Lampetra fluviatilis **(River Lamprey) [1099]** ***Phoca vitulina*** **(Harbour Seal) [1365]**		
Special Protection Areas (SPA)			
Cummeen Strand SPA (Site Code: 004035)	**Light-bellied Brent Goose (*Branta bernicla hrota)* [A046]** **Oystercatcher (*Haematopus ostralegus*) [A130]** **Redshank (*Tringa totanus*) [A162]** **Wetland and Waterbirds [A999]**	***c.0.5*** **km**	**Yes – a potential direct source-pathway-receptor linkage exists with this site. The proposed works is hydrologically connected to this European site.**

Potential impacts on European sites

Applying the precautionary principle, and in the absence of mitigation to avoid or reduce impacts upon the European site, it was not possible to rule out with certainty the potential for **"likely significant effects"** on:

- Lough Gill SAC (Site Code: 001976)
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627) and
- Cummeen Strand SPA (Site Code: 004035)

In order to prevent any impacts to the identified European sites, mitigation is specifically required in relation to the following aspects of the proposed works:

Likely Impacts during Construction

Direct

Potential direct impacts related to the proposed works include:

- Mortality of otter.

Indirect

Potential indirect impacts related to the proposed works include:

- Negative impacts on water quality
- Spread of invasive species

Consideration of in-combination impacts

Article 6 of the EU Habitats Directive and Regulation 15 of the European Communities (Natural Habitats) Regulations state that any plan or project that may, either alone or in-combination with other plans or projects, significantly affect a Natura 2000 site should be the subject of an appropriate assessment. The assessment of in-combination impacts is therefore an important part of the screening process.

In-combination impacts can be an issue when proposals have a small impact on European sites as a result of factors such as disturbance or pollution. If other proposals also have a further small impact, the combined result can be a significant impact on the Natura site.

Other plans or projects within the area which could result in combined impacts are residential buildings to which water quality impacts may be affected and also farming practices that in-combination could lead to negative impacts on water quality. The identified issues are considered to have the potential for in-combination impacts and therefore require further assessment.

Assessment of significance – screening matrix

Having laid out the site features and above for European site within the zone of influence that could be impacted by the proposal, the Significance of Impact Matrix (Table 2 below) provides an analysis of the potential for the proposal to result in a significant effect on the European site, taking account of the known threats to the Sites which are listed within the NPWS (2019) The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report. It is important to note at this stage that a potential significant effect can only be ruled out if there is considered to be no risk; any uncertainty must result in potential significant effect being assumed.

The significance of impact matrix of all relevant European sites within the Zone of Influence of the proposed works is shown in Table 2 below. Qualifying Interests (QI's) that are listed for European site below are considered to have the potential to be impacted by the proposed works either alone, or in-combination with impacts from other plans and projects within the zone of influence.

Table 2 Significance of Impact Matrix of all relevant European sites/Qualifying Interests (QIs) within the Zone of Influence of the Proposed Development.

European site (site code)	Conservation objectives[16]	QIs with potential for impact	Potential impacts and effects?[17]
Lough Gill SAC (001976)	NPWS (2021)	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] *Austropotamobius pallipes* (White-clawed Crayfish) [1092] *Petromyzon marinus* (Sea Lamprey) [1095] *Lampetra planeri* (Brook Lamprey) [1096]	Likely Significant Effect: The proposal includes works within the terrestrial boundary of this SAC which, in the absence of mitigation, could directly impact upon the aforementioned QIs as stated in Table 2 via direct impacts on species such as mortality and indirect impacts such as negative impacts on water quality and disturbance.

16 Conservation Objectives information is obtained from the National Parks and Wildlife Service (NPWS) website - https://www.npws.ie/ (Accessed January 2024)
17 Environmental Protection Agency (EPA) Maps - https://gis.epa.ie/EPAMaps/ - information from this website has been used to assist this screening exercise. (Accessed January 2024)

European site (site code)	Conservation objectives[16]	QIs with potential for impact	Potential impacts and effects?[17]
		Lampetra fluviatilis (River Lamprey) [1099] *Salmo salar* (Salmon) [1106] *Lutra lutra* (Otter) [1355]	
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (000627)	NPWS (2013)	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] *Juniperus communis* formations on heaths or calcareous grasslands [5130] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]	Likely Significant Effect: A direct source-pathway-receptor linkage exists with this site and so the proposal in the absence of mitigation, could directly impact upon the aforementioned QIs as stated in Table 2 via direct impacts on species such as mortality and indirect impacts such as negative impacts on water quality and disturbance.

European site (site code)	Conservation objectives[16]	QIs with potential for impact	Potential impacts and effects?[17]
		Petrifying springs with tufa formation (Cratoneurion) [7220] *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014] *Petromyzon marinus* (Sea Lamprey) [1095] *Lampetra fluviatilis* (River Lamprey) [1099] *Phoca vitulina* (Harbour Seal) [1365]	
Cummeen Strand SPA (Site Code : 004035)	NPWS (2013)	Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] Oystercatcher (*Haematopus ostralegus*) [A130] Redshank (*Tringa totanus*) [A162] Wetland and Waterbirds [A999]	Possible Significant Effect: A direct source-pathway-receptor linkage exists with this site and so the proposal in the absence of mitigation, could directly impact upon the aforementioned QIs as stated in Table 2 via indirect impacts such as negative impacts on water quality and disturbance.

Explanation of terms used in Significance of Impact Matrix:

Likely Significant Effect - Where a plan or project is likely to undermine any of the site's conservation objectives; **Possible Significant Effect** - Where a plan or project has an indicated potential to undermine any of the site's conservation objectives, but where doubt exists about the risk of a significant effect in the current context. Nevertheless, where doubt exists about the risk of a significant effect, use of the precautionary principle requires this effect to be considered appropriately within the Article 6 assessment process.

Conclusions of Screening Assessment

According to DoHELG (2010), the Appropriate Assessment Stage 1: Screening exercise can result in one of three conditions:

- An appropriate assessment is not required i.e., where the plan/proposal is associated with the management of the site
- There is no potential for significant effects i.e., appropriate assessment is not required, or
- Significant effects are certain, likely or uncertain i.e., the project must either proceed to Stage 2: Appropriate Assessment or be rejected.

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

In conclusion, this screening assessment has ascertained that Qualifying Interest features of three European sites have potential to be negatively affected by the proposed works. In view of best scientific knowledge, it is considered necessary to 'screen in' this proposal and undertake an appropriate assessment to determine whether the proposed works could affect the integrity of the following European sites:

- **Lough Gill SAC**
- **Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and**
- **Cummeen Strand SPA**

Therefore, a Natura Impact Statement (NIS) is required for this proposal.