APPROPRIATE ASSESSMENT
- SCREENING REPORT -
IN ACCORDANCE WITH THE REQUIREMENTS OF
ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

Burtonport Harbour Redevelopment

For: Donegal County Council
Date: 22 February 2019

Prepared by:

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1.0 Introduction

This report was commissioned by Donegal County Council (DCC) to determine if a proposal to redevelop the harbour at Burtonport, Co. Donegal is likely to impact negatively on the Natura 2000 sites in the area. The development proposal is currently being prepared for submission as a Part 8 Planning Application and a Foreshore Application.

This report examines the possible ecological implications of the proposed development, during construction and operation, and determines whether the proposal will have significant effects on the Natura 2000 sites, and whether these effects will adversely affect the integrity of the Natura 2000 sites in terms of their nature conservation objectives.

2.0 Natura 2000 and Appropriate Assessment

The introduction of the Birds Directive and the Habitats Directive in 1979 and 1992 respectively, made Ireland legally obliged to establish a Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species. This comprises Special Areas of Conservation (SACs, including candidate SACs), and Special Protection Areas (SPAs, including proposed SPAs). SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the qualifying interests of the sites; from these the conservation objectives of the site are derived.

Articles 6(3) and 6(4) of the Habitat Directive 92/43/EEC require an Appropriate Assessment of plans and projects to prevent significant adverse effects on Natura 2000 sites. The Assessment must determine whether the plan or project is likely to have significant effects on the site and whether these effects will adversely affect the integrity of the site in terms of its nature conservation objectives.

The first stage of the Appropriate Assessment (AA) process is AA Screening. Its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project, alone and in combination with other plans or projects, could have significant effects on a Natura 2000 site in view of the site’s conservation objectives. If significant effects are likely, uncertain or unknown at screening stage, the subsequent stages of Appropriate Assessment should be undertaken. This subsequent process is a focused and detailed impact assessment (Natura Impact Assessment) of the implications of the plan or project.

2.1 Other Designations and Wildlife Protection


The Wildlife Act is the principal national legislation providing for the protection of wildlife and the control of some activities that may have a negative effect on wildlife. The Wildlife (Amendment) Act 2000 strengthened the 1976 Act by, among other things, giving statutory protection to Natural Heritage Areas, improving existing measures to enhance protection of wildlife species and their habitats (e.g. fish and aquatic invertebrate species, hedgerow cutting) and strengthening the protective regime for Special Areas of Conservation (SACs).

The conservation of biodiversity in Ireland has been strengthened and expanded by EU law including the Water Framework Directive, the Birds Directive and the Habitats Directive.

Natural Heritage Area (NHA)

NHA is the basic designation for wildlife. A NHA is an area considered important for the habitats present or which holds species of plants and animals whose habitat needs protection. They may also be selected on the basis of their geology or geomorphology. NHAs are legally protected from damage from the date they are formally proposed for designation. NHAs were first entered into European Law under the 1976 Wildlife Act which was transposed into Irish law with the 1997 Natural Habitats Regulations (S.I. No. 94 of 1997). This gained full statutory backing in Ireland with the passing of the Wildlife (Amendment) Act 2000.

The Water Framework Directive

The Water Framework Directive (WFD) obliges member states to manage their waters in an integrated and sustainable way. They must ensure that their waters achieve at least good status, generally by 2027 at the latest, and that current status doesn’t deteriorate in any waters. To achieve good status and preserve the best
waters, management plans have been prepared for districts around the country. This project falls within the North Western International River Basin District Plan (2009–2015).

**International Union for the Conservation of Nature and Natural Resources (IUCN) Red Data Lists**

Though they have no legal standing in Ireland at present, IUCN Red Data Lists are a very important resource for conservation and protection of species and their habitats. Red Lists identify which species are in most danger, and categorise threatened species as follows: critically endangered (CR), endangered (EN), vulnerable (VU) or near threatened (NT). Red lists are an internationally recognized system for highlighting species in danger.

3.0 **Methodology**

- Desk research.
- Liaison with Stephen McConnell, Donegal County Council and Pat Vaughan, NPWS.
- Site visit on the 4th of February 2019.

4.0 **Project Description**

The proposal to redevelop the harbour at Burtonport seeks primarily to improve management and safety at the harbour. The harbour is a busy fishing port and it is also an essential gateway to the islands off shore. Visitors and residents have no alternative route and are obliged to use the harbour facilities.

The project does not aim to attract visitors to the harbour *per se*, however the project will improve the overall visitor experience to the area. Visitor numbers to the area are likely to increase due to initiatives such as the Wild Atlantic Way, this increase will happen irrespective of the redevelopment. An increase in the number of personnel working at the harbour is not anticipated.

The following information has been provided by DCC.

Burtonport Harbour is a working fishing port on the west Donegal coast. It services approximately 20 to 25 commercial fishing and shell fish boats who in turn service the local factories. There are two ferry companies operating from the main slipway year round, and numerous tour operators offering trips departing and returning to the harbour. The harbour is heavily used by non-commercial boats, mainly islanders travelling to and from the mainland, and pleasure boat users predominately in the summer months.

Due to the success of the Wild Atlantic Way introducing visitors to the area, adding to the influx of Gaeltacht students in the summer months, the harbour which is already restricted for space, becomes very congested. This congestion leads to hazardous conditions for all harbour users particularly the fishermen and boat users.

The redevelopment of the site as proposed in the drawing in Figure 2, seeks to address the congestion problem and provide a safe harbour for all users and visitors by providing adequate parking and facilities. The proposed works will include:

- Probable removal of all the existing unused sheds and buildings situated on the harbour (outlined in red on the drawings).
- Construction of new buildings to provide accommodation for Harbour Master, ferry operators, public toilets and other ancillary uses.
- Realignment both vertically and horizontally, of the road adjacent to the harbour to help with traffic flow and to prevent flooding issues.
- Additional car and RV parking.
- Traffic calming measures.
- Potential recycling facilities.
- Landscaping, hard stands, green areas etc.
- Potential construction of a pontoon to berth pleasure craft and other small boats.
Figure 1. Area under consideration for development and location of proposed pontoon (graphic provided by DCC).
Figure 2: Draft redevelopment plan for Burtonport Harbour (drawing provided by DCC).
5.0 Overview of project proposals

5.1 Existing uses and issues:

The site was visited on February 4th 2019, outside of the main tourist season, see plate 1. Burtonport Harbour is a busy fishing port with numerous fishing vessels 2-3 abreast at the main pier. The port is also used by a large number of local islanders and sailors/pleasure crafters visiting the area. Two ferries also operate from the slipway. There are inadequate mooring facilities in the harbour for these users and this results in unsuitable sharing of berthing at the main pier and competition for space.

There is also a shortage of car parking facilities at the harbour, which was apparent on the site visit. This problem is much worse during summer months. There are insufficient parking areas for visitors which results in cars being "abandoned" on the quay and pier. This makes access and maneuvering difficult for large lorries hauling fish from the harbour.

Untreated surface water and wastewater is piped directly to the sea. Public toilet facilities are located at the Harbour Master building.

Plate 1: View East from the main pier showing docked fishing vessels, ferry slipway and congestion on the pier. Buildings on the right hand side to be demolished.

When there is a spring tide there is usually some flooding caused by waves overtopping at the pier beside the ferry slipway, see plate 2. The main pier has not been known to flood. Excess surface water is currently drained through grates on the pier.
There was a significant amount of general waste lying around the harbour, which has the potential to get washed and blown into the sea. Waste included plastic bottles, old fishing gear and plastic of various types. Apart from the aesthetic impact, litter poses a serious threat to marine life and is an increasing issue in our waters.

5.2 Construction:

- The works will involve site clearance, demolition and removal of existing buildings.
- Movement and storage of materials.
- Disconnection and subsequent reconnection to utilities (power, water, toilet facilities and wastewater).
- Relocation and possible improvement of surface water drainage.
- Building construction (brick and mortar).
- Resurfacing of roadways and possible raising of pier height / installation of flood barrier at locations prone to overtopping waves.
- Installation of prefabricated floating pontoons by crane, to be secured by anchors and chains, see plate 3.

Plate 2: Buildings marked for demolition and removal, existing drainage, area prone to flooding at very high tides.

Plate 3: Example of proposed floating pontoon (image provided by DCC).
Plate 4: View South from main pier, proposed location for the pontoon.

A draft Construction Management Plan (dCMP) had been provided by Donegal County Council, see appendix 1.

5.3 Operation

The harbour will continue to operate as a working harbour with additional facilities for visitors and tourists to the area.

6.0 Brief description of the Natura 2000 sites

Figure 3. Project location relative to Natura 2000 sites (NPWS, 2019 ©OSI, ©ESRI)

The development site is not located in a Natura 2000 site, however there are a number of sites within a 15km radius of the proposal, which are listed in table 1.
Special Areas of Conservation:

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rutland and Island and Sound SAC</td>
<td>002283</td>
</tr>
<tr>
<td>Gweedore Bay and Islands SAC</td>
<td>001141</td>
</tr>
<tr>
<td>Aran Island Donegal Cliffs SAC</td>
<td>000111</td>
</tr>
<tr>
<td>Gannivegil Bog SAC</td>
<td>00142</td>
</tr>
<tr>
<td>West of Ardara/ Maas Road SAC</td>
<td>00197</td>
</tr>
<tr>
<td>Termon Strand SAC</td>
<td>00195</td>
</tr>
</tbody>
</table>

Special Protected Areas:

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Illancrone and Inishkeeragh SPA</td>
<td>004132</td>
</tr>
<tr>
<td>West Donegal Coast SPA</td>
<td>004150</td>
</tr>
<tr>
<td>West Donegal Islands SPA</td>
<td>004230</td>
</tr>
<tr>
<td>Derryveagh and Glendowan Mountains SPA</td>
<td>004039</td>
</tr>
<tr>
<td>Roaninish SPA</td>
<td>004121</td>
</tr>
<tr>
<td>Inishkeel SPA</td>
<td>004116</td>
</tr>
</tbody>
</table>

Table 1. Natura 2000 Sites within an 15km radius of project proposals

The Natura 2000 sites have been considered in terms of the potential impacts the project may have on the features of interest and conservation objectives of the Natura 2000 sites (see appendix 2). The marine habitats and species of Rutland Island and Sound SAC are considered to be at most significant risk, and are the focus of this screening assessment.

With regard to the other Natura 2000 sites in table 1: Given the spatial separation (c.5km in most cases), the species and habitats involved, and the temporary nature of the project, it is unlikely that impacts will be experienced. Those Natura 2000 Sites have therefore been screened out of further assessment (see appendix 2).

6.1 Overview of Rutland Island and Sound SAC (002283)

Rutland Island and Sound SAC lies between Aranmore Island and Burtonport in northwest Donegal, 5 km northwest of Dungloe. Besides Rutland itself a number of other small rocky islets are also included in the site. The bedrock of Rutland Island is granite, but the dune systems on the island are highly calcareous.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (* = priority; numbers in brackets are Natura 2000 codes):

- Coastal lagoons [1150]
- Large shallow inlets and bays [1160]
- Reefs [1170]
- Annual vegetation of drift lines [1210]
- Embryonic shifting dunes [2110]
- Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]
- Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]
- Humid dune slacks [2190]
- Phoca vitulina (Harbour Seal) [1365]

Rutland Channel and Sound is a complex of shallow reefs and sediment communities sheltered from wave action with varying degrees of current. The intertidal reefs are typical of these conditions with high species richness in the tide-swept sublittoral fringe. The shallow sublittoral reefs have excellent examples of tide-swept kelp communities with varying degrees of sand scour in which species richness is high. A number of species considered to be worthy of conservation occur, in particular, the sea squirt Stolonica socialis. The site displays a range of sediment types from coarse shelly sand to fine sand. The free-living red calcareous algae known as maerl (also called ‘coral’) occurs at several locations at the more open coastal sites on the south of Rutland Island. Beds of Eelgrass (Zostera marina) which host the rare hydroid Laomedea angulata and the southern species of burrowing anemone Anthopleura ballii are also present.

The site supports a population of Harbour Seal (maximum count of 202 in the all-Ireland survey of 2003).
**Conservation Objectives in Rutland Island and Sound SAC:**

- To maintain the favourable conservation condition of Coastal lagoons;
- To maintain the favourable conservation condition of Large shallow inlets and bays;
- To maintain the favourable conservation condition of Reefs;
- To maintain the favourable conservation condition of Annual vegetation of drift lines;
- To maintain the favourable conservation condition of Embryonic shifting dunes;
- To maintain the favourable conservation condition of Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes');
- To maintain the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation ('grey dunes');
- To maintain the favourable conservation condition of Humid dune slacks;
- To maintain the favourable conservation condition of Harbour Seal.

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. A site-specific conservation objective aims to define favourable conservation condition for a particular habitat or species at that site.

**Favourable Conservation Status is defined by Articles 1(e) and 1(i) of the Habitats Directive as follows:**

"The conservation status of a natural habitat is the sum of the influences acting on it and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species. The conservation status of a natural habitat will be taken as favourable when:

- its natural range and areas it covers within that range are stable or increasing; and
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and
- the conservation status of its typical species is favourable'.

The conservation status of a species is the sum of the influences acting on the species that may affect the long-term distribution and abundance of its populations. The conservation status will be taken as 'favourable' when:

- the population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats; and
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations."
7.0 Appropriate Assessment Screening - Assessment Criteria

Individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site.

<table>
<thead>
<tr>
<th>Action</th>
<th>Potential Impact (WITHOUT MITIGATION)</th>
<th>Threat to integrity of Natura 2000 site: Protected Species / Habitat</th>
</tr>
</thead>
</table>
| Site Clearance: Demolition and removals of existing buildings. | **Site clearance and Construction:**  
- Inadvertent release of suspended solids / pollutants into the sea adjacent to the site could cause a decline in habitat quality, and changes in chemical and pH status of the water.  
- Noise and disturbance to wildlife.  
**Operation:**  
- Untreated surface water will continue to be piped to the sea.  
- Untreated wastewater will continue to be piped to the sea.  
- Litter pollution.  
All operational impacts can cause a decline in habitat quality in particular water quality. | **Potential to impact**  
- Large shallow inlets and bays [1160]  
- Potential to negatively impact on water quality.  
- Reefs [1170]  
- Potential to impact on reef habitat and water quality.  
- Phoca vitulina (Harbour Seal) [1365].  
- Potential to cause disturbance due to increased activity and loud noise at the harbour.  
- Potential to negatively impact on water quality.  
Coastal lagoons [1150] are a sufficient distance north from the site and are relatively isolated, see appendix 3 (map 1). Given the spatial separation impacts are unlikely.  
Annual vegetation of drift lines [1210], Embryonic shifting dunes [2110], Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120], Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130], and Humid dune slacks [2190] do not occur at the development site and will not require further assessment. |
| Construction:  
Site preparation and groundwork to include clearing and levelling the site and laying foundations. Movement of fill within the site. Importing materials for construction. Vehicle activity.  
Pier: potential excavation of existing pier surfaces and laying of new concrete.  
Site development - landscaping / gardens.  
Installation of pontoon.  
Operation of pontoon.  
Operation of harbour:  
- Waste management. | |

Table 2. Individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site.
### Likely direct, indirect or secondary impacts (AFTER MITIGATION)

Table 3 outlines the likely direct, indirect, or secondary impacts of the project on the Natura 2000 sites by virtue of size and scale, land take, distance from the Natura 2000 site or key features of the site, resource requirements, emissions, excavation requirements, transport requirements and the duration of construction and operation.

<table>
<thead>
<tr>
<th>Size &amp; Scale</th>
<th><strong>No Impact:</strong> Total development site area is approximately 200m long by 20m wide and is already a working harbour and pier.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land take</td>
<td><strong>No Impact:</strong> Brownfield site, no change of footprint on land. Site is already developed and has derelict buildings in situ. The proposed pontoon is a floating structure and will be a single finger out into the harbour, see plate 3.</td>
</tr>
<tr>
<td>Distance from the Natura 2000 site or key features of the site</td>
<td><strong>Potential direct impact (temporary):</strong> Bordering Rutland Island and Sound SAC(002283). No impact anticipated on Natura 2000 site within 15km, see appendix 2: Gweedore Bay and Islands SAC (001141) Aran Island Donegal Cliffs SAC (000111) Gannivegil Bog SAC (00142) West of Ardara/ Maas Road SAC (00197) Termon Strand SAC (00195) Illancrone and Inishkeeragh SPA (004132) West Donegal Coast SPA (004150) West Donegal Islands SPA (004230) Derryveagh and Glendowan Mountains SPA (004039) Roaninish SPA (00412) Inishkeel SPA (004116)</td>
</tr>
<tr>
<td>Resource requirements (water abstraction etc.)</td>
<td><strong>No impact anticipated:</strong> Water will be required from the mains water supply during construction and operation.</td>
</tr>
<tr>
<td>Emissions (disposal to land, water, or air)</td>
<td><strong>Potential direct impact (temporary):</strong> During site clearance and construction: DRAFT CMP has been prepared; sediment and erosion management measures are included. <strong>Sufficient measures in the draft CMP to mitigate impacts.</strong> Land - No impact anticipated. Air &amp; Water - No significant long term impact anticipated. <strong>Operation:</strong> No increase in existing impact anticipated. Wastewater volumes have potential to increase due to tourism initiatives. This will not be as a direct result of the redevelopment proposal, and may happen irrespective of development. If redevelopment is completed before the Irish Water WWTP is functioning, wastewater will continue to be pumped, untreated, to the sea. When the WWTP is completed wastewater from buildings will discharge directly to the new WWTP facility (separate planning application by Irish Water - due for completion in 2021). <strong>Surface water emissions not likely to increase:</strong> Surface water to be piped to sea; use of hydrocarbon interceptors is not feasible due to the required depths of interceptors and the high tide experienced at the site. The outlet of the pipe would be 800mm below the top of the filter. The highest high tide is 3.8m and lowest high tide is 2.9m. The highest tide is level with the surface of the road and the outlet would be 800mm below. The interceptors would therefore be flooded on a twice daily basis. A SUDS approach to design is being explored also e.g. exterior paving to be permeable, to minimise standing water, reduce runoff allowing for percolation and adsorption through</td>
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the soil. Rainwater harvesting proposed in building design. Litter management needs to be improved; proposed recycling facilities should be included.

Excavation requirements

**Potential direct impacts (temporary):** Extensive excavation, pipe laying, preparation for resurfacing of roads, and possible raising of pier levels by c.500mm. Draft CMP has been prepared; sediment and erosion management measures are included. **Sufficient measures in the draft CMP to mitigate impacts.** Possible noise disturbance of Harbour Seal during moulting season (July and August).

Transportation requirements

Typical vehicles required for demolition and construction.
Concrete Lorry, Concrete Block Lorry, Rigid Lorry, Delivery Lorry – Long Wheel Base, Delivery Lorry – Short Wheel Base, Teleporter, Dumper, Staff transportation consisting of cars and vans. 20T Excavators, Mini Diggers. Wheel wash. **Sufficient measures in the draft CMP to mitigate impacts.**

Crane for removal of modular buildings and installation of pontoon.
The existing road network will be used for transport during construction and operation.
Site management plan required to ensure smooth running of the development.

Other

**Pontoon: No impact anticipated**
There are no protected species or habitats at the location proposed for the pontoon, see appendix 3.
There is frequent boat traffic in the area for which the pontoon is proposed. There are several moorings already in place, however they are insufficient in number, and competition for space is high. Due to the design of the pontoon and the sheltered location proposed, the impact from altered hydrology will be minimal and insignificant. The proposed site is surrounded by granite and rock armour so erosion or scouring of the coastline will not occur. There will be no direct discharge to the marine environment from the pontoon itself and the pontoon is required to service the existing recreational and visitor boats to the region.

Duration of construction, operation etc.

**No significant impact:** Site Clearance and Construction: approx. 6-12 months. **Timing of works outside of July and August to prevent disturbance of Harbour Seal.** How the project will be implemented is dependent on availability of funding. It is probable, at the time of writing, that the project will be implemented in phases as funding permits, rather than being done as one large development project.
Operation to continue indefinitely, impacts likely to remain the same.

Table 3: Likely direct, indirect, or secondary impacts of the project.

7.2 Cumulative impacts with other plans/projects.

Other projects:

**Water Framework Directive**
The Water Framework Directive (WFD) obliges member states to manage their waters in an integrated and sustainable way. They must ensure that their waters achieve at least good status, generally by 2027 at the latest, and that current status doesn’t deteriorate in any waters. To achieve good status and preserve the best waters, management plans have been prepared for districts around the country. This project falls within the North Western International River Basin District Plan (2015-2021). Relevant projects underway as part of the implementation of this plan include:

**Environmental Protection Agency (EPA) Monitoring Programme.** The EPA is responsible for the monitoring of water quality around the country.
Irish Water Wastewater Treatment Plant Proposal. Irish Water is preparing a planning application to develop a wastewater treatment plant at the harbour. This will enable safe treatment of all wastewater generated at the harbour. According to the Irish Water Website the project is due for completion in 2021.

Proposed fibre optic cable to Aranmore
Aranmore Community Council have received funding to lay a fibre optic cable from just south of Burtonport Harbour to Aranmore Island (via Rutland Island). The route proposed is unlikely to have any impact on the harbour proposals and there is unlikely to be any cumulative impact on habitats or species in the SAC due to the low impact nature, and short duration of works proposed for cable laying and installation.

The harbour redevelopment is unlikely to have a negative cumulative effect on the Natura 2000 site. Proposals at the harbour offer the opportunity to improve levels of surface water treatment (through SuDS) and litter management. Other plans and projects will have a positive or neutral impact on the Natura 2000 Site.

8.0 Habitat area, species density, disturbance and fragmentation
There will be no reduction of habitat area, reduction of species density, or habitat or species fragmentation. Sensitive habitats do not occur in the immediate vicinity of works see appendix 3. Construction works are land based, and the pontoon will be floating structure fixed by anchor and chain.

Disturbance to key species
Waterfront construction activities cause considerable noise and vibration, these are easily transmitted to adjacent waters may cause temporary disturbance of the Harbour Seal. Temporary displacement of Seals is unlikely to be significant as long as it doesn't interfere with the annual cycle of the Seal. Breeding and haul out sites are to the south of the harbour; it is unlikely that the project will impact on those activities. However, there are two moulting sites close to the harbour, see appendix 3. Due to the close proximity of the moulting sites to proposed works it is possible that the Harbour Seal will be disturbed at an important stage in its annual cycle. Moulting generally occurs during July and August. Works should not occur at this time.

8.1 Changes in key indicators of conservation value
A change in key indicators of conservation value (water quality etc.) is not anticipated. The draft CMP includes a range of erosion and sediment control measures to address the risk of runoff into the sea. Surface water quality should not deteriorate or increase, and proposals for SuDS in appropriate areas, will mean runoff will have time to percolate rather than spill directly into the sea.

An increase in wastewater is possible due to the success of tourism initiatives in the area. This is as a result of tourism to the area and will not be caused by the harbour redevelopment. The development of the Irish Water Waste Water Treatment Plant at the site will eliminate water pollution risks in the future.

Negative impacts caused by the redevelopment of Burtonport Harbour on the Natura 2000 site as a whole, in terms of interference with the key relationships that define the structure of the site, and interference with key relationships that define the function of the site are not likely.

The implementation of the Water Framework Directive in the region will highlight any decline or improvement of species/habitats/indicators in the area via the EPA water monitoring programme.

8.2 Occurrence of other protected species not designated in the SAC/SPA
Bats: A walkover survey of the site was carried out on February 4th 2019. Buildings that are marked for demolition were entered to determine if there were any signs of bat activity or roosting, for example, urine stains, droppings or food remains. No evidence of bats was seen. It should be noted that bats often use different areas for roosting at different times of the year. If bats are found on site all works must cease and the National Parks and Wildlife should be contacted.

Cetaceans: Noise and vibration may cause temporary displacement however works will be short term and localised. Cetaceans will usually return to the area once the disturbance ceases. The use of hydroacoustics is not proposed during the works so it is unlikely that there will be any significant impact to cetaceans.
9.0 Discussion

Burtonport harbour is a busy harbour from both commercial fishing and tourism perspectives. The facilities at the harbour are not currently fit for purpose due to user conflicts, and competition for space at and around the pier. The proposals to redevelop the harbour seek to marry the two uses of the harbour together, by providing facilities for the tourism industry and thereby separating tourists from the existing fishing industry requirements.

The site clearance and construction phase of the redevelopment poses the greatest risk to the marine habitats and species in Rutland Island and Sound SAC, in terms of pollution and sediment release. Noise and vibration may also disturb the Harbour Seal. The impacts relating to site clearance and construction have been mitigated against in the draft CMP. If the draft CMP is adhered to there should be no significant impact on the receiving environment. Works should not take place during July and August to avoid disturbing the Harbour Seal during moult season.

The proposed pontoon structure and positioning will not pose any threat to the Natura Site; the location is not within the SAC, and there are no protected species or habitats in the vicinity of the proposed location. Hydrological impacts are not thought to be significant due to the sheltered location and surrounding rocky coastline.

With regard to operations at the harbour, there are several issues apart from overcrowding including: occasional flooding, lack of surface water treatment, lack of waste water treatment, and general litter management and storage of materials at the harbour.

At the moment, anything spilled on the harbour’s working surface eventually finds its way into the sea. Discharge of untreated drainage to harbour waters can have serious effects on water quality and aquatic life. These types of pollutant are stored in the sediment and can have long lasting effects. To address this issue Donegal County Council has explored the possibility of including hydrocarbon interceptors along the quay and at the pier. However, this is not deemed feasible as the required depth for interceptors is below the high tide level at the pier, hence the interceptors would be flooded rendering them null and void.

All surfaces around the pier and in car parks are currently impermeable. Therefore any pollutants on the ground bypass any available natural treatment processes, such as percolation through the soil, and adversely affect the water quality in receiving waters. A sustainable urban development system (SuDS) approach to redevelopment at the harbour will provide another means of slowing and reducing volumes of runoff from the site and will allow percolation and some adsorption through the soil. This approach may not be appropriate for all areas around the harbour for the following reasons:

- the bedrock in the area is primarily granite so there may be limited natural soil depths, which may impact on the effectiveness of SuDs.
- The area beside the slipway is prone to flooding at times of spring tide, see plate 2. A flood barrier is one option being explored to avoid waves overtopping. There is a concern however that during high seas and storms, the area behind the barrier may trap water. Any drainage systems in place should be developed to cope with this possibility.

If improvements in surface water treatment are not deemed feasible, the existing method of surface water management will continue after redevelopment. While this is not ideal, the proposed redevelopment will not worsen the ongoing environmental impacts caused by harbour activities.

Wastewater at the harbour is not treated at present. An increase in wastewater is an ongoing symptom of tourism success in the area, and will not be caused by the redevelopment project itself. The redevelopment will provide new public toilet facilities, however the number of facilities at the harbour is not the concern, it is the frequency of use. If the redevelopment proposal does not proceed the existing toilet facilities will be used more frequently by the increasing number of visitors; wastewater volumes will increase irrespective of redevelopment. A significant increase (if any) in personnel working at the harbour is not anticipated. Impacts from Wastewater will be eliminated when the proposed Irish Water WWTP is in operation.
Summary of mitigation and precautionary measures to be incorporated into the project design

Construction:

- Works must be supervised by a qualified engineer. Site management plans and method statements must be developed. Maintenance and management of erosion and sediment control measures is paramount. During construction a closed site system is required whereby no runoff will be allowed to leave the site. The Construction Management Plan must be adhered to.
- Due to the proximity of Harbour Seal moulting sites, works must not take place during July and August.
- Due to the proximity of the project to a Natura 2000 site NPWS should be notified before works commence. Pat Vaughan (087 2646419) is the point of contact. Works should cease immediately if it is felt by the NPWS officer that any aspect of work is adversely impacting on the Natura 2000 site.

Project Design and Operation

- In the event that construction of new buildings and associated facilities precedes the completion of the Irish Water Waste Water Treatment Plant all required infrastructure should be put in place to allow for immediate connection to the WWTP.
- High efficiency toilets, taps and appliances must be installed in new buildings.
- Surface water must be treated as much as practicable. A SuDS approach to drainage to be incorporated into the design of the buildings and surrounds, to include: rainwater harvesting and permeable car parking areas and footpaths as appropriate.
- New tourism buildings/facilities in the flood risk area will also need to be elevated to ensure flooding does not occur.
- Adequate storage of hazardous materials will need to be away from flood risk areas in a bunded zone. Spill kits should be provided on site and adequate training given.
- Litter control should be improved at the harbour.

10.0 Conclusion

The consultation process and Screening Assessment of the project proposal concluded that the most vulnerable habitats and species in Rutland Island and Sound SAC were: Large shallow inlets and bays [1160], Reefs [1170] and Phoca vitulina (Harbour Seal) [1365]. The site clearance and construction phases of redevelopment proposal pose the greatest threat to the SAC. Donegal County Council has provided a draft CMP which addresses the potential impacts identified.

Consideration has also been given to how water treatment could be improved at the Harbour. Surface water treatment proposals for the use of hydrocarbon interceptors have unfortunately not proved feasible. The proposed Irish Water WWTP at Burtonport harbour will treat future wastewater at the harbour. In the interim, the redevelopment proposals will not directly impact on the volumes of wastewater generated. The numbers of personnel at the harbour is not anticipated to change, and any increase in wastewater generation will be due to growing tourism in the area. The environmental impact of operational activities at the harbour is therefore not likely to change significantly.

It can be concluded, that if the draft CMP, and the mitigation and precautionary measures outlined in this report are implemented, the project proposal to redevelop the harbour at Burtonport (either individually or in combination with other plans/projects) will not have a lasting or irreversible adverse impact on the integrity of the Natura 2000 Site, Rutland Island and Sound SAC 002283. The favourable conservation status of the site should remain unaffected. Stage 2 of the Appropriate Assessment process (Natura Impact Assessment) is not required. A finding of no significant impact can be seen in Appendix 4.
11.0 Research Documents

- NPWS (2013b) Rutland Island and Sound SAC (site code 2283) Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013
- NPWS (2013d) Rutland Island and Sound SAC (site code 2283) Conservation objectives supporting document - coastal habitats NPWS Version 1 September 2013
- NPWS (2014) Rutland Island and Sound SAC (site code 2283) Site Synopsis
Appendix 1: Draft Construction Management Plan

DRAFT Management Plan - Construction, Environmental and Traffic

Introduction
Burtonport Harbour is a working fishing port on the west Donegal coast. It services approximately 20 to 25 commercial fishing and shell fish boats who in turn service the local factories. There are two ferry companies operating from the main slipway year round, and numerous tour operators offering trips departing and returning to the harbour. The harbour is heavily used by non-commercial boats, mainly islanders travelling to and from the mainland, and pleasure boat users predominately in the summer months.

Due to the success of the wild Atlantic Way introducing visitors to the area, adding to the influx of Gaeltacht students in the summer months, the harbour which is already restricted for space, becomes very congested. This congestion leads to hazardous conditions for all harbour users particularly the fishermen and boat users.

The redevelopment of the site as proposed in the drawing below seeks to address the congestion problem and provide a safe harbour for all users and visitors by providing adequate parking and facilities. The proposed works will include but not be limited to:

- Probable removal of all the existing unused sheds and buildings situated on the harbour (outlined in red on the drawings)
- Construction of new buildings to provide accommodation for Harbour Master, ferry operators, public toilets and other ancillary uses.
- Realignment both vertically and horizontally, of the road adjacent to the harbour to help with traffic flow and to prevent flooding issues
- Additional car and RV parking
- Traffic calming measures
- Potential recycling facilities
- Landscaping, hard stands, green areas etc.
- Potential construction of a pontoon to berth pleasure craft and other small boats.
**Construction Management Plan**

**Site Clearance**

To facilitate the redevelopment of the harbour, existing large brick and mortar structures will be completely removed to make way for the newly realigned road and new buildings and car parks.

All buildings designated to be removed will be vacated by their current lease holders and any materials will be removed and recycled or disposed of to landfill as required until the buildings are completely empty. As some of these buildings have asbestos roofs, specialist contractors will be employed to remove and transport the roofing to an appropriate location for disposal.

The remaining inert building materials will be transported off site using excavators and tipper lorries to an appropriate designated site.

The portable or modular buildings will be removed off site using a crane to hoist the buildings onto a lorry and taken to the owner’s premises off site.

The crane power pack needs to remain to power the existing quay side crane; this can be removed from the existing block structure and housed in a new kiosk at a suitable location near the crane.

Any remaining materials i.e. old trailer, vehicles, nets, fish boxes etc. Will be removed off site or stored in an agreed location not hampering the flow of traffic or site works.

**Material Storage**

Any construction material stored on site will be stored above the high tide level; in a location where any surface runoff from the materials can be intercepted using silt mitigation measures to prevent silt entering the bay.

As space is minimal, deliveries to site will be as required in an effort to reduce stockpile size.

**Utility works**

The existing power lines and communication lines are currently overhead and the new building power supply will also be via overhead lines, these will be considered in the H+S plan.
Potable water is currently underground, new pipes will be laid from the start of the site to the new buildings, and existing supplies will tie into this new pipe. The pipe route will be excavated by excavator with the material loaded directly in to a tipping lorry for removal from site directly, or into a dumper and transported to a holding area away from the harbour to reduce the effects of sedimentation runoff entering the harbour.

The existing toilets and changing rooms will be kept in operation, if these toilets are to be removed as part of the works alternative toilets will be made available, or the new toilets will be constructed prior to the old toilets being demolished.

Drainage works
The existing surface drainage discharges directly in to the harbour as an anti-ponding measure. During the construction process these drainage points will have silt protection measures to filter any sediment generated on the surface. The site will be swept and cleaned daily during excavation processes.

The existing drainage route to the harbour outfall will be abandoned and removed or filled with foam concrete or similar to impede water flow to the bay. The new drainage will be laid to a hydrocarbon separation filter (if feasible) to remove any future petrol/oil/diesel spillage from the surface water prior to discharging into the bay.

As with the utility works the route will be excavated by excavator with the material loaded directly in to a tipping lorry for removal from site directly, or into a dumper and transported to a holding area away from the harbour to reduce the effects of sedimentation runoff entering the harbour.

Building Construction
The proposed buildings will be constructed with block and mortar. The foundations will be excavated using an excavator with the material loaded directly in to a tipping lorry for removal from site directly, or into a dumper and transported to a holding area away from the harbour to reduce the effects of sedimentation runoff entering the harbour.

Care will be taken to reduce waste and litter in site during construction. Bins and depots will be provided for segregated site recycling and waste disposal.

Surfacing
The road way and carparks will be raised by approx 500mm using imported Granular Material Type B sub-base material and an asphaltic concrete surface.

If the Quay is to be raised (undecided yet) and the concrete in the location of the quay is sufficiently robust it will be raised to the finished level using a single concrete slab, if it is not robust enough the concrete will be removed to reveal the fill material and the levels raised using granular material finished with a concrete surface slab.

As with the utility works the route will be excavated by excavator with the material loaded directly in to a tipping lorry for removal from site directly, or into a dumper and transported to a holding area away from the harbour to reduce the effects of sedimentation runoff entering the harbour.

Pontoon
The pontoons will be purchased ready to be set in the water. The only construction will be the concrete anchor point for the pontoon access gangway which will be built on the edge of the quay. Using a land based crane to lift the floating pontoon sections with anchors and chains attached to the pontoon, into the water. Float the pontoons into position of the four anchor points and drop the anchors. Float the pontoon into its final location and connect the chains form the anchors onto the pontoon. Using the crane lift the gangway section in to position at the land based anchor point and the newly secured floating pontoon location point.
Environmental Management

Dust and air quality management
During the construction phase, there will be various site clearance works and activities undertaken, which all have the potential to generate particle emissions, which may settle and enter watercourses.

The main sources of particle emissions during construction activities include:

- haulage routes, vehicles and construction traffic;
- materials handling, storage, stockpiling, spillage and disposal;
- site preparation, earthworks and restoration after completion.

A number of mitigation methods will be implemented to minimise the impact arising from dust during works:

- vehicles carrying loose aggregate and workings will be sheeted at all times;
- appropriately designed vehicles for materials handling will be used;
- completed earthworks (if any) will be covered, seeded, or vegetated where appropriate with indigenous species;
- regular inspection and, if necessary, cleaning of local roads and site boundaries to check for dust deposits (and removal if necessary);
- minimising surface areas of stockpiles to reduce area of surfaces exposed to wind pickup;
- where appropriate, windbreak netting/screening will be positioned around material stockpiles and vehicle loading/unloading areas;
- where practicable, stockpiles of materials will be located as far as possible from sensitive properties and ecological receptors (i.e. drainage ditches, sea), taking account of prevailing wind directions;
- during dry or windy weather, material stockpiles and exposed surfaces will be covered;
- all construction plant and equipment will be maintained in good working order and not left running when not in use.

Erosion and surface water management

The movement and maintenance of plant on site, as well as materials, can generate silt and oil contaminated water. This can cause damage to sensitive habitats and pollution if released as suspended sediment in the water.

To reduce the pollution risk:

- where possible construction will be carried out during dry weather to reduce risk of runoff;
- in-water machine works should be minimised as much as possible;
- plant and wheel washing will be carried out in a designated area as far away as practicable from any watercourse, waterbody or surface water drain;
- run-off will be collected in a settlement area, to allow for percolation and subsequent removal by a licensed operator;
- all site works will be undertaken with suitable temporary drainage measures in place in order to minimise the potential risk of increased sediment reaching nearby waters; Any additional drainage associated with works should not be allowed to discharge directly into drains or waterbodies and will discharge to a settlement area;
- strict control of the site boundaries will be enforced by the Site Manager, including minimal land clearance and restrictions on the use of machinery near water bodies. Appropriate fencing will be used to delineate exclusion areas;
- mounded excavated material, open excavations and stockpile areas for materials will be kept to minimum size and will be covered during periods of heavy rainfall e.g. impermeable mats (plastic sheeting). Fencing with geotextile membrane will be used as required to prevent passage of silt;
- sediment traps (if necessary) will be installed at intervals;
- road sweepers will be utilised, where necessary;
- materials used during the construction works such as oil, chemicals, cement waste will be transported by registered carriers, and disposed of to appropriately licensed sites;
- all machinery/equipment will be well serviced and in good working condition. Machinery/equipment will be inspected daily for leaks of hydrocarbons;
- plant and equipment will be stored in areas which are less susceptible to possible pollution incidents, or on dedicated areas of hard standing. All static plant shall be placed with drip trays to prevent ground contamination as a result of oil spills and leaks;
- refueling of plant/machinery will be undertaken in designated areas on an impermeable surface and away from any drains or watercourses/bodies (at least 30m). A spill kit will be available for use in the event of an accident. Refueling will always be carried out in a controlled manner with absorbent materials available to clean up any spillages;
- a bunded storage area will be located on-site, as far away from ditches/drains/waterbodies as practicable, and will be provided for the duration of the construction period for the storage of oils, fuels, chemical and other hazardous materials;
- procedures will be set in place to respond to any emergency incidents which may occur on the Site. All appropriate staff will be trained and made aware of the pollution and spill contingency procedures set in place. In the event of an incident the NPWS and the Environment Protection Agency will be notified immediately.
Traffic Management
The main access to site will be via the R260 from the North East or the Lachenagh Road from the South East.

During times of significantly raised traffic, a one way system will be introduced to reduce the risk of accidents with two vehicles meeting on the narrow roads. The direction will be established following consultation with the haulage company and factory and harbour users.

During a construction phase which will impede on one lane of traffic a traffic management plan will be implemented to control the flow of traffic. If both lanes will be blocked access to the harbour will always be maintained from either the R260 or the Lachenagh road, depending on the location of the works.
### Appendix 2: Preliminary Screening of all Natura 2000 sites within a 15km radius of Burtonport Harbour.

<table>
<thead>
<tr>
<th>Natura 2000 sites within 15km radius</th>
<th>Features of Interest</th>
<th>Screen IN/OUT</th>
<th>Reason for screening decision</th>
</tr>
</thead>
</table>
| **Rutland and Island and Sound SAC (002283)** | Coastal lagoons [1150]  
Large shallow inlets and bays [1160]  
Reefs [1170]  
Annual vegetation of drift lines [1210]  
Embryonic shifting dunes [2110]  
Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]  
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]  
Humid dune slacks [2190]  
*Phoca vitulina* (Harbour Seal) [1365] | IN | Directly linked to the project proposal potential to impact  
- Large shallow inlets and bays [1160]  
Potential to negatively impact on water quality.  
- Reefs [1170]  
Potential to impact on reef habitat  
- *Phoca vitulina* (Harbour Seal) [1365].  
Potential to cause disturbance due to increased activity and loud noise at the harbour.  
Potential to negatively impact on water quality |
| | | | Coastal lagoons [1150] are a sufficient distance north from the site and are relatively isolated see appendix 3, Map 1. Given the spatial separation impacts are unlikely.  
Annual vegetation of drift lines [1210], Embryonic shifting dunes [2110], Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120], Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130], and Humid dune slacks [2190] do not occur at the site and will not require further assessment. |
| **Gweedore Bay and Islands SAC (001141)** | Coastal lagoons [1150]  
Reefs [1170]  
Perennial vegetation of stony banks [1220]  
Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330]  
Mediterranean salt meadows (*Juncetalia maritimi*) [1410]  
Embryonic shifting dunes [2110] | OUT | Sufficient distance from Features of Interest |
### Natura 2000 sites within 15km radius

<table>
<thead>
<tr>
<th>Natura 2000 sites within 15km radius</th>
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<th>Reason for screening decision</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Shifting dunes along the shoreline with <em>Ammophila arenaria</em> (white dunes) [2120]</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</td>
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<tr>
<td></td>
<td>Decalcified fixed dunes with <em>Empetrum nigrum</em> [2140]</td>
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<tr>
<td></td>
<td>Atlantic decalcified fixed dunes (<em>Calluno-Ulicetea</em>) [2150]</td>
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<tr>
<td></td>
<td>Dunes with <em>Salix repens</em> ssp. argentea (<em>Salicion arenariae</em>) [2170]</td>
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<tr>
<td></td>
<td>Humid dune slacks [2190]</td>
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<tr>
<td></td>
<td>Machairs (* in Ireland) [21A0]</td>
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<td></td>
<td>Oligotrophic to mesotrophic standing waters with vegetation of the <em>Littorelletea uniflorae</em> and/or <em>Isoetanojuncetea</em> [3130]</td>
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<tr>
<td></td>
<td>European dry heaths [4030]</td>
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<tr>
<td></td>
<td>Alpine and Boreal heaths [4060]</td>
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<td></td>
<td><em>Juniperus communis</em> formations on heaths or calcareous grasslands [5130]</td>
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<td></td>
<td><em>Euphydryas aurinia</em> (Marsh Fritillary) [1065]</td>
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<td></td>
<td><em>Lutra lutra</em> (Otter) [1355]</td>
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<td></td>
<td><em>Petalophyllum ralfsii</em> (Petalwort) [1395]</td>
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<td></td>
<td><em>Najas flexilis</em> (Slender Naiad) [1833]</td>
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<tr>
<td></td>
<td><em>Aran Island Donegal Cliffs SAC</em> (000111)</td>
<td>OUT</td>
<td>Sufficient distance from Features of Interest</td>
</tr>
<tr>
<td></td>
<td>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</td>
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<tr>
<td></td>
<td>European dry heaths [4030]</td>
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<td></td>
<td>Alpine and Boreal heaths [4060]</td>
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<td></td>
<td>Calcareous rocky slopes with chasmophytic vegetation [8210]</td>
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<tr>
<td></td>
<td>Siliceous rocky slopes with chasmophytic vegetation [8220]</td>
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<tr>
<td></td>
<td>Submerged or partially submerged sea caves [8330]</td>
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<tr>
<td></td>
<td><em>Gannivegil Bog SAC</em> (00142)</td>
<td>OUT</td>
<td>Sufficient distance from Features of Interest</td>
</tr>
<tr>
<td></td>
<td>Oligotrophic waters containing very few minerals of sandy</td>
<td></td>
<td></td>
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<tr>
<td>Natura 2000 sites within 15km radius</td>
<td>Features of Interest</td>
<td>Screen IN/OUT</td>
<td>Reason for screening decision</td>
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<td></td>
<td>plains ((Littorellelalia uniflorae)) [3110]Northern Atlantic wet heaths with <em>Erica tetralix</em> [4010]Blanket bogs (* if active bog) [7130]</td>
<td>OUT</td>
<td>Sufficient distance from Features of Interest</td>
</tr>
</tbody>
</table>
### Features of Interest

**Natura 2000 sites within 15km radius**

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<td>Alpine and Boreal heaths [4060]</td>
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<td></td>
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<tr>
<td>Juniperus communis formations on heaths or calcareous grasslands [5130]</td>
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<td></td>
</tr>
<tr>
<td>Semi-natural dry grasslands and scrubland facies on calcareous substrates <em>Festuco-Brometalia</em> (<em>important orchid sites</em>) [6210]</td>
<td></td>
<td></td>
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<tr>
<td>Molinia meadows on calcareous, peaty or clayey-silt-laden soils <em>Molinion caeruleae</em> [6410]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lowland hay meadows <em>Alopecurus pratensis, Sanguisorba officinalis</em> [6510]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Blanket bogs (<em>if active bog</em>) [7130]</td>
<td></td>
<td></td>
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<tr>
<td>Depressions on peat substrates of the <em>Rhynchosporion</em> [7150]</td>
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<tr>
<td>Alkaline fens [7230]</td>
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<tr>
<td>Vertigo geyeri (Geyer’s Whorl Snail) [1013]</td>
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<tr>
<td>Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]</td>
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<tr>
<td>Euphydryas aurinia (Marsh Fritillary) [1065]</td>
<td></td>
<td></td>
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<tr>
<td>Salmo salar (Salmon) [1106]</td>
<td></td>
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<tr>
<td>Lutra lutra (Otter) [1355]</td>
<td></td>
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<tr>
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<td></td>
<td></td>
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<tr>
<td>Termon Strand SAC (001195)</td>
<td>OUT</td>
<td>Sufficient distance from Features of Interest</td>
</tr>
<tr>
<td>Coastal lagoons [1150]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Illancrone and Inishkeeragh SPA (004132)</td>
<td>OUT</td>
<td>SPA Natura Sites are important as breeding sites for seabirds and overwintering sites for barnacle goose</td>
</tr>
<tr>
<td>Barnacle Goose <em>Branta leucopsis</em> [A045]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Common Tern <em>Sterna hirundo</em> [A193]</td>
<td></td>
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</tr>
<tr>
<td>Arctic Tern <em>Sterna paradisaea</em> [A194]</td>
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</tbody>
</table>

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*AA Screening - Burtonport Harbour Redevelopment - J Devlin 22 Feb 2019*
<table>
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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>West Donegal Coast SPA (004150)</strong></td>
<td>Little Tern (<em>Sternula albifrons</em>) [A195]</td>
<td></td>
<td>unlikely. Not likely to be significant to impact on breeding or wintering species.</td>
</tr>
<tr>
<td></td>
<td>Fulmar (<em>Fulmarus glacialis</em>) [A009]</td>
<td>OUT</td>
<td>There is a temporary risk to water quality during construction however draft Construction Management Plan (CMP) addresses issues. Any risks to birds feeding/swimming in the vicinity of the project / harbour will be temporary.</td>
</tr>
<tr>
<td></td>
<td>Cormorant (<em>Phalacrocorax carbo</em>) [A017]</td>
<td></td>
<td>Conservation Objectives for the SPA's: To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA will not be impacted.</td>
</tr>
<tr>
<td></td>
<td>Shag (<em>Phalacrocorax aristotelis</em>) [A018]</td>
<td></td>
<td>Favourable conservation status of a habitat is achieved when:</td>
</tr>
<tr>
<td></td>
<td>Peregrine (<em>Falco peregrinus</em>) [A103]</td>
<td></td>
<td>• its natural range, and area it covers within that range, are stable or increasing, and</td>
</tr>
<tr>
<td></td>
<td>Herring Gull (<em>Larus argentatus</em>) [A184]</td>
<td></td>
<td>• the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and</td>
</tr>
<tr>
<td></td>
<td>Kittiwake (<em>Rissa tridactyla</em>) [A188]</td>
<td></td>
<td>• the conservation status of its typical species is favourable.</td>
</tr>
<tr>
<td></td>
<td>Razorbill (<em>Alca torda</em>) [A200]</td>
<td></td>
<td>The favourable conservation status of a species is achieved when:</td>
</tr>
<tr>
<td></td>
<td>Chough (<em>Pyrrhocorax pyrrhocorax</em>) [A346]</td>
<td></td>
<td>• population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and</td>
</tr>
<tr>
<td><strong>West Donegal Islands SPA (004230)</strong></td>
<td>Shag (<em>Phalacrocorax aristotelis</em>) [A018]</td>
<td>OUT</td>
<td>• the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and</td>
</tr>
<tr>
<td></td>
<td>Barnacle Goose (<em>Branta leucopsis</em>) [A045]</td>
<td></td>
<td>• there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.</td>
</tr>
<tr>
<td></td>
<td>Corncrake (<em>Crex crex</em>) [A122]</td>
<td></td>
<td>The project is a sufficient distance from the SPA's and is temporary in nature; it will not impede reaching the conservation objectives for the Natura 2000 sites.</td>
</tr>
<tr>
<td></td>
<td>Common Gull (<em>Larus canus</em>) [A182]</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>Herring Gull (<em>Larus argentatus</em>) [A184]</td>
<td></td>
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</tr>
<tr>
<td><strong>Derryveagh and Glendowan Mountains SPA (004039)</strong></td>
<td>Red-throated Diver (<em>Gavia stellata</em>) [A001]</td>
<td>OUT</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Merlin (<em>Falco columbarius</em>) [A098]</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Peregrine (<em>Falco peregrinus</em>) [A103]</td>
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<tr>
<td></td>
<td>Golden Plover (<em>Pluvialis apricaria</em>) [A140]</td>
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<tr>
<td></td>
<td>Dunlin (<em>Calidris alpina schinzii</em>) [A466]</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Roaninish SPA (004121)</strong></td>
<td>Barnacle Goose (<em>Branta leucopsis</em>) [A045]</td>
<td>OUT</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Herring Gull (<em>Larus argentatus</em>) [A184]</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Inishkeel SPA (004116)</strong></td>
<td>Barnacle Goose (<em>Branta leucopsis</em>) [A045]</td>
<td>OUT</td>
<td></td>
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</tbody>
</table>
Appendix 3: Rutland Island and Sound (002283) Site Synopsis and Location of relevant Features of Interest

Site Synopsis

Rutland Island and Sound SAC lies between Aran Island and Burtonport in north-west Donegal, 5 km north-west of Dungloe. Besides Rutland itself a number of other small rocky islets are also included in the site. The bedrock of Rutland Island is granite, but the dune systems on the island are highly calcareous.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (* = priority; numbers in brackets are Natura 2000 codes):

- [1150] Coastal Lagoons*
- [1160] Large Shallow Inlets and Bays
- [1170] Reefs
- [1210] Annual Vegetation of Drift Lines
- [2110] Embryonic Shifting Dunes
- [2120] Marram Dunes (White Dunes)
- [2130] Fixed Dunes (Grey Dunes)*
- [2190] Humid Dune Slacks
- [1365] Common (Harbour) Seal (*Phoca vitulina*)

On the western side of Rutland Island, vigorous embryonic dunes with Sand Couch (*Elymus farctus*) are backed by dunes with Marram (*Ammophila arenaria*) and Common Milkwort (*Polygala vulgaris*) and by fixed grey dunes with Kidney Vetch (*Anthyllis vulneraria*), Common Bird’s-foot-trefoil (*Lotus corniculatus*), Lady’s Bedstraw (*Galium verum*), Biting Stonecrop (*Sedum acre*) and mosses (e.g. *Tortula spp.*). The fixed dunes grade into dune grassland. Good dune slacks, flushes and marshes also occur in places. Plants typically occurring in these damp areas include Cuckooflower (*Cardamine pratensis*), Bog Pimpernel (*Anagallis tenella*), Water Mint (*Mentha aquatica*) and Selfheal (*Prunella vulgaris*). The south end of the island has good drift line vegetation characterised by orache species (*Atriplex spp.*).

Sally’s Lough, which is situated in the eastern part of the site, is a good example of a saline lake lagoon. While the lagoon basin is entirely natural, the narrow tidal inlet is apparently artificial. Seawater enters the lake on most tides but is diluted by rainfall running off the surrounding hills. Depth is up to 4 m and salinity has varied from 28 ppt to 34.3 ppt. Two lagoonal specialists, tasselweed (*Ruppia spp.*) and the green alga *Chaetomorpha linum*, were recorded in a recent survey, as well as a rare alga, *Cladophora battersii*, which grows unattached on the lagoon bed. Extensive underwater cliffs occur in the south-western quarter. These support a moderately diverse macro-algal flora. Common Reed (*Phragmites australis*) occurs at the western end of the lake and the lagoon habitat is relatively rich, with 49 additional taxa recorded in a recent survey. Four species are regarded as lagoonal specialists: the molluscs *Onoba aculeus* and *Cerastoderma glaucum*, the isopod *Idotea chelipes* and the bryozoan *Conopeum seurati*. Two further species, *Ampithoe ramondi* and *Lembos longipes* (both Order Amphipoda) are rare in Ireland.

Rutland Channel and Sound is a complex of shallow reefs and sediment communities sheltered from wave action with varying degrees of current. The intertidal reefs are typical of these conditions with high species richness in the tide-swept sublittoral fringe. The shallow sublittoral reefs have excellent examples of tide-swept kelp communities with varying degrees of sand scour in which species richness is high. A number of species considered to be worthy of conservation occur, in particular, the sea squirt *Stolonica socialis*. The site displays a range of sediment types from coarse shelly sand to fine sand. The free-living red calcareous algae known as maerl (also called ‘coral’) occurs at several locations at the more open coastal sites on the south of Rutland Island. Beds of Eelgrass (*Zostera marina*) which host the rare hydroid *Laomedea angulata* and the southern species of burrowing anemone *Anthopleura ballii* are also present.

The site supports a population of Common Seal (maximum count of 202 in the all-Ireland survey of 2003).

Snipe have been recorded in the wet areas in the dunes.

Rutland Island and Sound contains important examples of eight habitats listed on Annex I of the E.U. Habitats Directive. The presence of a number of rare marine species adds further to the conservation importance of the site.
Map 1 Lagoon Distribution Map (Extracted from Conservation objectives supporting document- Lagoon Version 1, 2013).
Map 2: Extent of Large shallow inlets and bays in Rutland Island and Sound SAC. (Extracted from Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013).
Map 3: Extent of Reefs in Rutland Island and Sound SAC. (Extracted from Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013).
Map 4: Distribution of community types in Rutland Island and Sound SAC (Extracted from Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013).
Map 5: *Phoca vitulina* - Known breeding sites in Rutland Island and Sound SAC (Extracted from Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013).
Map 6: *Phoca vitulina* - Known moulit haul-out sites in Rutland Island and Sound SAC. (Extracted from Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013).
Map 7: *Phoca vitulina* - Known resting haul-out sites (non-breeding) in Rutland Island and Sound SAC
(Extracted from Conservation objectives supporting document - Marine Habitats and Species Version 1, August 2013).

### Habitats Directive Finding of No Significant Effects Matrix

<table>
<thead>
<tr>
<th>Name of the project or plan</th>
<th>Redevelopment of Burtonport harbour, Co. Donegal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name and location of the Natura 2000 sites</td>
<td>Adjacent: Rutland and Island and Sound SAC (002283)</td>
</tr>
<tr>
<td></td>
<td>Within 15km radius:</td>
</tr>
<tr>
<td></td>
<td>Gweedore Bay and Islands SAC (001141)</td>
</tr>
<tr>
<td></td>
<td>Aran Island Donegal Cliffs SAC (000111)</td>
</tr>
<tr>
<td></td>
<td>Gannivegil Bog SAC (00142)</td>
</tr>
<tr>
<td></td>
<td>West of Ardara/ Maas Road SAC (00197)</td>
</tr>
<tr>
<td></td>
<td>Termon Strand SAC (00195) Illancrone and Inishkeeragh SPA (004132)</td>
</tr>
<tr>
<td></td>
<td>West Donegal Coast SPA (004150)</td>
</tr>
<tr>
<td></td>
<td>West Donegal Islands SPA (004230)</td>
</tr>
<tr>
<td></td>
<td>Derryveagh and Glendowan Mountains SPA (004039)</td>
</tr>
<tr>
<td></td>
<td>Roaninish SPA (004121)</td>
</tr>
<tr>
<td></td>
<td>Inishkeel SPA (004116)</td>
</tr>
<tr>
<td><strong>Description of the project or plan</strong></td>
<td>Site clearance, demolition and removal of existing buildings.</td>
</tr>
<tr>
<td></td>
<td>Movement and storage of materials.</td>
</tr>
<tr>
<td></td>
<td>Disconnection and subsequent reconnection to utilities (power, water, toilet facilities and wastewater).</td>
</tr>
<tr>
<td></td>
<td>Relocation and possible improvement of surface water drainage.</td>
</tr>
<tr>
<td></td>
<td>Building construction (brick and mortar).</td>
</tr>
<tr>
<td></td>
<td>Resurfacing of roadways and possible raising of pier height / installation of flood barrier at locations prone to overtopping waves.</td>
</tr>
<tr>
<td></td>
<td>Installation of prefabricated floating pontoons by crane, to be secured by anchors and chains.</td>
</tr>
<tr>
<td></td>
<td>The harbour will continue to operate as a working harbour with additional facilities for visitors and tourists to the area.</td>
</tr>
<tr>
<td><strong>Is the project or plan directly connected with or necessary to the management of the site (provide details)?</strong></td>
<td>No</td>
</tr>
</tbody>
</table>
| **Are there other projects or plans that together with the project or plan being assessed could affect the site (provide details)?** | Water Framework Directive  
Environmental Protection Agency (EPA) Monitoring Programme  
Irish Water Wastewater Treatment Plant Proposal  
Proposed fibre optic cable to Aranmore |
**The Assessment of Significance of Effects**

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

<table>
<thead>
<tr>
<th>Potential to impact Rutland Island and Sound SAC. All other Natura Sites screened out due to spatial separation and species / habitat requirements, see Appendix 2 of AA Screening Report.</th>
</tr>
</thead>
</table>

**Site clearance and Construction:**
- Inadvertent release of suspended solids / pollutants into the sea adjacent to the site could cause a decline in habitat quality, and changes in chemical and pH status of the water.
- Noise and disturbance to wildlife (Harbour Seal moulting sites).

**Operation:**
- Untreated surface water will continue to be piped to the sea.
- Untreated wastewater will continue to be piped to the sea.
- Litter pollution.
  All operation impacts can cause a deterioration in habitat quality, water quality in particular.

**Explain why these effects are not considered significant.**

<table>
<thead>
<tr>
<th>Construction: Draft CMP has been prepared; sediment and erosion management measures are included. Sufficient measures in the draft CMP to mitigate impacts. Timing of works outside of July and August to prevent disturbance of Harbour Seal during moulting season. Operation: Emissions specific to harbour activities likely to remain the same. Use of hydrocarbon traps not feasible due to high tides and flood risk. Wastewater will not be increased as a result of the redevelopment. Proposed Irish Water WWTP due for completion in 2021. Favourable conservation status unlikely to change.</th>
</tr>
</thead>
</table>

**List of agencies consulted: provide contact name & telephone or email address**

| Stephen McConnell, Donegal County Council 0877158396 |
| Pat Vaughan NPWS 087 2646419 |

**Response to consultation**

Information received from DCC for assessment purposes. No specific comment or concerns from Pat Vaughan - proposal will be sent to NPWS development response unit in Dublin for comment during planning process.

**Data collected to carry out the assessment**

<table>
<thead>
<tr>
<th>Who carried out the assessment?</th>
<th>Sources of Data</th>
<th>Level of assessment completed</th>
<th>Where can the full results be accessed and viewed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jessica Devlin M.Sc. Applied Environmental Science</td>
<td>NPWS Donegal County Council</td>
<td>AA Screening</td>
<td>Please contact Jessica Devlin <a href="mailto:jessica@jessicadevlin.com">jessica@jessicadevlin.com</a> Mob:00353872508386</td>
</tr>
</tbody>
</table>