

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

Donegal County Council
Bundoran Regeneration Project

For: Paul Doherty Architects Ltd.

Castle Street

Donegal Town

Co. Donegal

Date: 21 March 2023

Prepared by:

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PROJECT MANAGEMENT & ENVIRONMENTAL SERVICES

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1.0 Introduction

This Screening Report has been prepared by Jessica Devlin for Paul Doherty Architects Ltd. and Donegal County Council for the purpose of a Part 8 Planning Permission Application pertaining to the regeneration of Bundoran, Co. Donegal, Ireland. This report has been compiled to provide the competent authority with adequate information to make an appropriate assessment of the Project under Article 6(3) of the Habitat Directives. It describes the proposed project and the receiving environment. The zone of likely influence will be identified and any Natura 2000 sites within that zone will be identified. Any possible negative direct or indirect impacts on the Qualifying Interests (QI) of the Natura 2000 sites will be identified and the significance of the impacts will be assessed. This report follows the methodology set out in the Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4), E.C., 2002.

1.1 Natura 2000 and Appropriate Assessment

The introduction of the EU Birds Directive and the Habitats Directive in 1979 and 1992 respectively, made member states 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.

Article 6(3) of the Habitats Directive states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

The assessment can be broken down into 4 main stages:

Stage 1 - Screening: Results of preliminary impact identification and assessment of significance of impacts.

Stage 2 - Appropriate Assessment: Assessment of the impact on the integrity of the site(s) and assessment of mitigation measures (NIS Report).

Stage 3 - Assessment of alternative solutions.

Stage 4 - Imperative Reasons of Overriding Public Interest (IROPI): IROPI test and assessment of compensatory measures.

2.0 Statement of authority

Jessica graduated from the National University of Ireland, Galway in 1997 with a BSc. honours degree in Geology and obtained a MSc. in Applied Environmental Science from Queens University Belfast in 2001. She attained a National Certificate in Eco-Tourism, from Sligo Institute of Technology in 2005 and in 2014 completed Geographical Information Systems for Environmental Investigations, University College Dublin.

Over the years, Jessica has gained a wide range of experience in research, consultancy and project management with particular emphasis on sustainable development in freshwater, marine and coastal environments.

As field scientist with the Queens University Marine Station in Portaferry, Jessica carried out habitat surveys with respect to the decline of salmonid populations in Northern Ireland Rivers. She progressed to research assistant with Queens University and the Department of Agriculture & Rural Development. As project manager for the Donegal County Council - Marine & Water Leisure Programme, she managed projects on sustainable development of the marine leisure product. Jessica also worked with the University College Cork Coastal and Marine Research Centre in partnership with Donegal County Council and the University of Ulster, as manager of the Donegal element of a North West Europe Interreg Project called IMCORE (Innovative Management of Europe's Changing Coastal Resource). For the past 10 years Jessica has been self-employed working as a project manager and environmental consultant, specialising in freshwater, marine, coastal and environmental projects. Her client base is wide reaching from state agencies to community groups, individuals, angling clubs and private developers.

3.0 Methodology

- Liaison with Paul Doherty Architects Ltd.
- Site visit and walkover survey on 10 Nov 2022.
- Desk research (list not exhaustive, see section 11 for full detail).
- Online data available on European sites and protected habitats/species as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie, including conservation objectives documents.
- I-Webs Data from Birdwatch Ireland.
- Online data available on protected species as held by the National Biodiversity Data Centre (NBDC) from www.biodiversityireland.ie.
- Information on www.catchments.ie and www.epa.ie with regard to water quality.
- Information on groundwater resources and groundwater quality in the area available from www.epa.ie and www.gsi.ie.

This report has been prepared using the following guidance. A full list of research sources and references can be seen in section 11.

- Dept. of Environment Heritage and Local Government (2009) Appropriate Assessment of plans and projects, Guidance for planning authorities.
- 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 November 2001.
- OPR Practice Note (March 2021) Appropriate Assessment Screening for Development Management.

4.0 Overview of project proposals

Donegal County Council is applying Planning Permission for landscaping of three roundabouts at the entry to the Bundoran town, and installation of an art piece in the centre of each roundabout. It is also proposing urban realm works i.e. new road and pavement surfaces, lighting, street furniture and signage on three side streets within the town, which all link the Main Street to the Atlantic Way.

See extract from planning advertisement below as supplied by Paul Doherty Architects Ltd.

Description and Extents
<p>Donegal County Council proposes to carry out the following development of public realm improvement works and wayfinding signage in the townlands of Drumacrin, Maghercar & Finner in Bundoran in the Donegal Municipal District.</p> <p>The proposed development will include the following works;</p> <ol style="list-style-type: none">1. New road & footpath paving / surfaces, lighting, seating, and feature lighting structures at Meehan's Lane, Central Lane and Rennisons Lane.2. Wayfinding signage to include directional signage and information panels at various locations throughout the town.3. Wayfinding Art installation at the pedestrian promenade and bicycle service station on Atlantic Way.4. Associated ancillary works to include site clearance, site drainage connecting to the existing public stormwater network, service ducting & connection to services, landscaping, appropriate boundary treatment and development related signage.

5.0 Overview of Natura 2000 sites

5.1 Zone of influence

The approach to screening is likely to differ somewhat for plans and projects, depending on scale and on the likely effects and should include any Natura 2000 sites within the likely zone of impact of the plan or project. 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 Natura 2000 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) (OPR, 2021).

The Natura 2000 Sites have been assessed in terms of whether a Source - Pathway - Receptor relationship exists, and screened out accordingly. Where no source - pathway- receptor relationship is considered to exist these Natura 2000 sites are screened out and will not be discussed further in this report.

The project at its nearest point is c.100m from Donegal Bay SPA and 50m from Lough Melvin SAC.



Figure 1. Individual project items in relation to Natura 2000 Sites Donegal Bay SPA and Lough Melvin SAC within the zone of influence of the project (400m). (Map source: www.npws.ie accessed 10 Nov 2022, © ESRI, © OSI)

Natura 2000 Site / (Site Code) / Distance from project (m)	Source Pathway Receptor Relationship Screened IN/ OUT
<p>Donegal Bay SPA (004151), project 100m from SPA boundary at closest point.</p> <p>Qualifying Interests: Great Northern Diver (<i>Gavia immer</i>) [A003] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Common Scoter (<i>Melanitta nigra</i>) [A065] Sanderling (<i>Calidris alba</i>) [A144] Wetland and Waterbirds [A999]</p>	<p>Potential hydrological, acoustic and visual link with the SPA. Screened IN</p>
<p>Lough Melvin SAC (000428), project 50m from SAC at closest point.</p> <p>Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130] <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410] <i>Salmo salar</i> (Salmon) [1106] <i>Lutra lutra</i> (Otter) [1355]</p>	<p>Water Quality: Potential Source - Pathway - Receptor relationship. Pollution via road drainage could cause deterioration of water quality in Drowes River and Donegal Bay. Screened IN</p>

Table 1. Initial screening of Natura 2000 sites within zone of influence.

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. Lough Melvin SAC and Donegal Bay SPA are in close proximity to the development site and have been screened in for further assessment. Site synopses can be seen in Appendix 1.

Potential effects were identified as:

- Deterioration of water quality caused by run-off and pollution, during construction, that may lead to the Drowes River and /or Donegal Bay.
- Disturbance of waterbirds: Some of the listed waterbird species may at times use habitats situated within the immediate hinterland of Donegal Bay SPA or in areas ecologically connected to it.

Potential impacts and their significance are discussed further in Section 8 and 9.

5.2 Summary of Natura 2000 sites

Detailed site synopses can be seen in Appendix 1.

Donegal Bay SPA is approximately 15 km along its north-east/ south-west axis, with a width of 3 km to over 8 km. It provides extensive habitat for waterfowl. The inner bay has numerous small, grassy islands and areas of salt marsh. It has a diversity of marine biotopes and supports a range of macroinvertebrates and bivalves. Much of the shoreline is rocky or stony which varies from well-developed littoral reefs to shingle or cobble beaches. Donegal Bay supports an excellent diversity of wintering water-birds, especially species associated with shallow bays, it is considered to be of high ornithological importance. Two species have populations of international importance (Great Northern Diver and Light-bellied Brent Goose) and a further two species have populations of national importance (Common Scoter and Sanderling).

Lough Melvin SAC

Lough Melvin is situated in the extreme north-west of Co. Leitrim, about 4 km south of Bundoran. Lough Melvin is an oligo-mesotrophic lake and is approximately 13 km long by 3 km wide. A number of inflowing and outflowing streams and rivers are included in the site, for instance, the Drowes River links the lake to Donegal Bay. Several large islands occur on the lake. The most extensive terrestrial habitat in the site is lowland wet grassland. This is highly variable throughout the site in both its species composition and species richness. Grassland ascribable to the E.U. Habitats Directive Annex I type Molinia Meadows has been reported by the Irish Semi-natural Grasslands Survey (2009) from Gubacreeny (site no. 802) and Gubalaun (site no. 804). The main interest of the site is the unique fish community which the lake supports. Lough Melvin is an excellent example of a natural, post-glacial salmonid lake. Otter have been recorded from the Drowes River and the main inflowing rivers, and are likely to be widespread throughout the site.

Conservation Objectives

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."*

Conservation objectives for Donegal SPA (004151):

Objective 1: To maintain the favourable conservation condition of Great Northern Diver, Light-bellied Brent Goose, Common Scooter and Sanderling in Donegal Bay SPA Table 2. Conservation objective attributes and targets for water birds in Donegal Bay SPA

Objective 2: To maintain the favourable conservation condition of the wetland habitat in Donegal Bay SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.

Conservation objectives for Lough Melvin SAC (000428)

Objective 1: To restore the favourable conservation condition of Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*.

Objective 2: To restore the favourable conservation condition of Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)

Objective 3: To maintain the favourable conservation condition of Atlantic Salmon (*Salmo salar*)

Objective 4: To maintain the favourable conservation condition of Otter (*Lutra lutra*)

5.3 Other plans/projects

5.3.1 The Wildlife Acts 1976 to 2021

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.

5.3.2 County Donegal Development Plan 2018- 2024:

Policy NH-P-1 of the *County Donegal Development Plan 2018-2024* States the following:

“It is a policy of the Council to ensure that development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife/habitat significance in accordance with European and National legislation including: SACs, Special SPAs, NHAs, Ramsar Sites and Statutory Nature Reserves”

Any existing/proposed plan or project that could potentially affect Natura 2000 sites, in combination with the proposed development, must adhere to this environmental policy. Any projects or plans within the zone of influence of the project will be required to carry out Stage 1 and/or stage 2 of the Appropriate Assessment process thereby ensuring protection of Natura 2000 sites.

At the time of writing there were no live planning applications pending within the immediate vicinity of the project locations. Recent planning permissions include a funfair extension on the sea ward side, and septic tank installations near Tullaghan Roundabout have been screened out for Appropriate Assessment. Over the last 10 years planning applications granted within Bundroan have been extensions to existing buildings and change of use applications, the majority of which were for buildings on the main street side of Bundoran.

5.3.3 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. 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. Both chemical and ecological monitoring is undertaken by the EPA to ascertain water quality status.

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

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), near threatened (NT) or least concern (LC). Red lists are an internationally recognized system for highlighting species in danger.

5.3.5 Ramsar Sites

The Ramsar Convention is an international agreement for the conservation and wise use of wetlands. It is also known as the Convention on Wetlands and it is named after the city of Ramsar in Iran, where the Convention was signed in 1971. The Ramsar Convention (2010) defines wetlands as:

“ areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres.”

6.0 Site description

A walkover survey of the sites was carried out on the 10 November 2022. This was a rapid assessment of the ecological features present, or potentially present, within a site and its surrounding area (the zone of influence) in relation to the project. The roundabout sites are typical roundabouts with road and grassy middle and some signage. The laneways are all devoid of vegetation and are hard man made grounds surrounded by buildings. There are no suitable habitats for any of the qualifying interests for either Donegal Bay SPA or Lough Melvin SAC.

6.1 Hydrology/ Hydrogeology

There are water bodies flowing near proposed works at the Drumacrin and Tullaghan roundabouts. The Bradogue river enters the sea at Bundoran beach to the north (c.200m) and south (c. 600m) of the sites, the Drowes river enters the sea south of Tullaghan, see figure 2. According the EPA website, www.catchments.ie, the bathing water quality at the beach is of excellent quality. The coastal water quality status is currently High status. The water quality of the Bradogue is Moderate. The Drowes is classed as Good. Groundwater is classified as good.



Figure 2. River network and water quality in the Bundoran area. (Map source catchments.ie accessed 10 November 2022, © ESRI, © OSI)

The road system surrounding the sites has storm water drainage.



Plate 1. Looking south down Renisons Lane



Plate 2. Looking south, Renisons Lane joining main street.

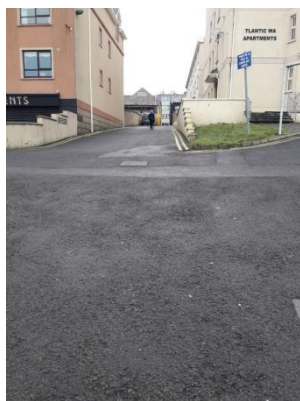


Plate 3. Looking south down Meehans Lane



Plate 4. Looking north up Meehans Lane



Plate 5. looking north up Central Lane



Plate 6. Looking south from shoreline. Beach is screened by lay of the land and shore wall.



Plate 7. Finner Roundabout



Plate 8. Drumacrin Roundabout



Plate 9. Tullaghan roundabout.

7.0 Detailed project proposals as provided by Paul Doherty Architects Ltd.

Donegal County Council is applying for Planning Permission for the landscaping of three roundabouts at the entry to the Bundoran town and installation of an art piece in the centre of each roundabout. It is also proposing urban realm works i.e. new road and pavement surfaces, lighting, street furniture and signage on three side streets within the town, which all link the Main Street to the Atlantic Way.

The roundabouts are going to stay the same except for the art installations in the centre of each.

It is proposed that the laneways be resurfaced with a mixture of natural stone and paving, surfaces will be permeable. Stormwater will enter the existing road drainage system; run-off will be slowed down due to the fact that the new surfaces will be permeable.

The works will be a standard civil engineering contract with the removal of the existing surfaces and the upgrading where necessary of the existing underground services and the re-paving of the roads and footpaths, with the provision of new lighting.

The wayfinding will be the provision of new directional signage and feature signage at various points around the town; in most cases, replacing existing signage and in a few places installation of new signage.

Associated ancillary works to include site clearance, site drainage connecting to the existing public stormwater network, service ducting and connection to services, landscaping, appropriate boundary treatment and development related signage.

8.0 Assessment of project proposal in terms of potential direct, indirect or cumulative impacts on Natura 2000 Sites.

Table 4 explores where there may be potential for the project to impact Natura Sites and their qualifying interests.

Attribute	Description	Potential Impact to Natura 2000 site?
Size & Scale	c.1.5acres spread across 6 different sites	No impact.
Land take	No land take	No impact.
Distance from the Natura 2000 site or key features of the site	100m from the boundary of Donegal SPA at closest point. 50m from Lough Melvin SAC at closest point.	No impact. Landscaping and installation of art pieces to be confined to the roundabout boundaries. Surfaces will remain grassy and permeable. The laneways are currently hard manmade ground – refurbishment of existing structures. Works are small scale and of short duration. New surfaces will be permeable which will slow surface water run-off, an improvement on current conditions. Small scale works. Once works are complete there will be no significant change in operational activity/use at the site: refurbishment of existing facilities.
Resource requirements (water abstraction etc.)	None.	
Emissions (disposal to land, water, or air)	Noise emissions. Potential for run-off and pollution from sites (very low risk)	
Excavation requirements	Site preparation and resurfacing, extensive excavation or levelling site is not envisaged.	
Transportation requirements	Lorries and excavators for delivery and works	
Duration of construction, operation etc.	Short duration; individual pieces of work to be completed in 2 weeks – 1 month No change in current use.	

Table 4. Project activity and the potential direct, indirect and cumulative impacts it may have.

9.0 Assessment of significance

As discussed in section 8, there is little potential for the project to impact on Donegal Bay SPA or Lough Melvin SAC.

Table 5 explores further the likely significance of the project and the potential impacts identified, in terms of disturbance to key species, habitat or species fragmentation, reduction in species density and changes in key indicators of conservation value, i.e. water quality.

9.1 Assessment of project proposal in terms of habitat loss, disturbance, fragmentation or reduction in species density:

Natura 2000 site & Qualifying Interest	Potential impacts from the proposed development on the integrity of the Natura 2000 site, individually or in combination with other projects	Significance of Impact
<p>Donegal Bay SPA (004151) Qualifying Interests: Great Northern Diver (<i>Gavia immer</i>) [A003] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Common Scoter (<i>Melanitta nigra</i>) [A065] Sanderling (<i>Calidris alba</i>) [A144] Wetland and Waterbirds [A999] Lough Melvin SAC Qualifying interests Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130] <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410] <i>Salmo salar</i> (Salmon) [1106]</p>	<p>Direct loss of habitat There will be no direct loss of habitat within the Natura 2000 sites.</p>	<p>No impact. No potential for significant effects.</p>
	<p>Indirect loss of habitat: A species may stop using a habitat due to increased disturbance or habitat degradation on site. Habitat degradation due to hydrological impacts via surface water.</p> <p>Water quality: Construction: The construction period of the proposed development poses little risk to the surrounding environment. The sites are already developed, major excavation will not be required; there is very little risk of run-off from the sites. The only works in close proximity to water courses are those at Tullaghan roundabout and Drumacrin roundabout. The works will be confined to the footprint of the roundabouts and risk of runoff or pollution is low given the scale and nature of works. Normal construction practices are sufficient to mitigate any potential risks.</p> <p>Works are downstream of Oligotrophic waters [3130] (NPWS 2021). Due to the location scale and nature of works there is little risk of damaging salmonid spawning grounds, or impacting water quality for Salmon, Otter or Waterfowl. Molinia Meadows are found upstream of works and will not be impacted (NPWS, 2021).</p> <p>Operation: Roundabouts: The site surfaces at the roundabouts will remain permeable. Rain water will permeate to ground as it does at present. There is no risk of pollution or run off from the site. Laneways: New surfaces will be permeable and will slow surface run off. Surface water will also be treated through the permeation process. Excess surface water</p>	<p>No impact. No potential for significant effect</p>

Natura 2000 site & Qualifying Interest	Potential impacts from the proposed development on the integrity of the Natura 2000 site, individually or in combination with other projects	Significance of Impact
<p><i>Lutra lutra</i> (Otter) [1355]</p>	<p>runoff will drain to the existing drainage system. Based on the information provided there is no significant risk of pollution from the proposal. Operation at the site will not change.</p>	
	<p>Disturbance / Displacement: Noise and visual disturbance: Waterfowl: Donegal Bay is designated for a number of <u>wintering</u> waterbirds. For waterbirds, construction-related disturbance effects would not be expected to extend beyond a distance of c. 300m, as noise levels associated with general construction activities would attenuate to close to background levels at that distance (Cutts <i>et al.</i>, 2009). These distances are applicable to the construction phase.</p> <p>The proposed development is within 100m of Donegal Bay SPA at its closest point; the project has 6 separate elements to it and is spread across a wide area. Works will therefore not be consistently within the 100m range of the SPA. While the construction phase may create noise, it is unlikely to cause disturbance or displacement of bird species in Donegal Bay SPA for the following reasons:</p> <p>The Construction phase will be short and noise will not be consistently within range of the SPA.</p> <p>Works are screened from activity by the lay of the land and the natural and manmade screening, roads and car parks along the shore line, see plate 6.</p> <p>Historical Irish Wetland Bird Survey (IWeBS) data for the site was consulted, see appendix 2. I-WeBS is a volunteer survey carried out across Ireland aimed at estimating population size, species distribution and trends of non-breeding/wintering water birds. The area near the project site falls within an IWeBS subsite Aughrus Point OA468. Bundoran beach has limited shoreline, and limited habitat for SCI species, I-WeBs data shows that Aughrus Point does not have significant number of wintering water fowl, which are generally well below 1% national figures, see appendix 2.</p> <p>The area of bay close to the project is small relative to the Aughris Pt. subsite see Appendix 2, figure 1.</p> <p>There will be no significant change in use or activity at the site which is screened by the lay of the land and the natural and manmade topography, shore wall, roads and car parks along the shore line see plate 6.</p> <p>Otter</p> <p>The Drowes River may be used by commuting and foraging Otter. In general, Otter exploit a narrow strip of habitat at the aquatic – terrestrial interface (O’Neill,</p>	<p>No impact No potential for significant effects.</p>

Natura 2000 site & Qualifying Interest	Potential impacts from the proposed development on the integrity of the Natura 2000 site, individually or in combination with other projects	Significance of Impact
	<p>2008).</p> <p>No signs of Otter were noted on the site visit. Tullaghan Roundabout is c. 70m from the Drowes river and any suitable Otter habitat. Otter are nocturnal therefore any impact is unlikely because works will take place during daylight hours. If disturbance /displacement were to occur it would be short lived and there is ample alternative habitat available while works are in progress. It is unlikely that works will disturb or displace Otter if present. The roundabout is on a busy national road, otter are therefore used to the usual traffic noise.</p> <p>Works are low impact and of short duration. As discussed previously water quality is not likely to be impacted.</p> <p>Salmon: No in river works are proposed. Works near the Drowes River (Tullaghan roundabout) are low impact and of short duration. As discussed previously water quality is not likely to be impacted.</p>	
	<p>Habitat or Species fragmentation There will be no habitat fragmentation.</p>	<p>No Impact. No potential for significant effects.</p>
	<p>Reduction in Species Density It has been demonstrated in the discussion above in terms of hydrological impacts and displacement or disturbance to feeding, resting and breeding areas there is no potential for a significant impact either during construction or operation.</p>	<p>No Impact. No potential for significant effects.</p>
	<p>In combination: At the time of writing there were no live planning applications pending within the immediate vicinity of the project locations. Recent planning permissions in the wider area including funfair extension on the sea ward side, and septic tank installations near Tullaghan Roundabout have been screened out for Appropriate Assessment. Over the last 10 years planning applications granted within Bundroan have been extensions to existing buildings and change of use applications, the majority of which were for buildings on the main street side of Bundoran.</p> <p>Any other future projects will be subject to Appropriate Assessment.</p>	<p>No cumulative effects anticipated.</p>

Table 4. Likely significance of impacts.

9.2 Cumulative Impacts

The potential for cumulative impacts to arise from the project proposal is regulated and controlled by the environmental policies and objectives of the Donegal County Council; policy NH-P-1 of the *County Donegal Development Plan 2018-2024* states the following:

“It is a policy of the Council to ensure that development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife/habitat significance in accordance with European and National legislation including: SACs, Special SPAs, NHAs, Ramsar Sites and Statutory Nature Reserves”

Any existing/proposed plan or project that could potentially affect Natura 2000 sites, in combination with the proposed development, must adhere to the overarching environmental policies of the County Development Plan and Local Area Plans. These policies will ensure the protection of the Natura 2000 sites within the zone of influence of the proposed project and include the requirement for any future plans or projects to undergo Screening for Appropriate Assessment and/or Appropriate Assessment (NIS) to examine and assess their effects on Natura 2000 sites, alone and in combination with other plans and projects.

It has been demonstrated that there is no potential for significant effects on any Natura site, therefore cumulative effects are unlikely.

10.0 Conclusion

Donegal County Council is applying for planning permission for the development of public realm improvement works and wayfinding signage in the townlands of Drumacrin, Maghercar and Finner in Bundoran. The project is small scale, with 6 elements spreading over the wider Bundoran town and outskirts to include refurbishment of three laneways within the town and the installation of art pieces at three roundabouts leading into the town.

Natura 2000 sites within the zone of influence of the project were assessed. The project is close to Donegal Bay SPA (004151) and Lough Melvin SAC (000428). A site visit was carried out on 10 Nov 2022 and a desk study completed using existing available data for the site.

The project proposal has been assessed in terms of the likely impacts the proposal may have on the Natura 2000 sites in the area. The significance of impacts identified (if any) has been determined. It has been determined that the project does not pose a risk to the marine and coastal environment or Donegal Bay SPA or Lough Melvin SAC.

This report presents a Stage 1 Appropriate Assessment Screening outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the project, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any Natura 2000 site.

The Competent Authority has been provided with information to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant Natura 2000 sites, the Project, individually or in combination with other plans or projects is likely to have a significant effect on any Natura 2000 site.

It can be objectively concluded that there is no possibility of significant impacts on any Natura 2000 site, their features of interest and site specific conservation objectives. Stage 2 of the Appropriate Assessment process (Natura Impact Statement) is not required.

11.0 References

The following research documents/ sources were used in the preparation of this report:

Dept. of Environment Heritage and Local Government (2009) *Appropriate Assessment of plans and projects, Guidance for planning authorities.*

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NPWS (2012a) Donegal Bay Special Protection Area (Site Code 4151) Conservation Objectives Supporting Document Version 1.

NPWS (2012b) *Conservation Objectives: Donegal Bay SPA 004151.* Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2021) *Conservation Objectives: Lough Melvin SAC 000428.* Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

NRA (2009) *Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes*

O'Neill L. (2008) *Population dynamics of the Eurasian otter in Ireland. Integrating density and demography into conservation planning.* PhD thesis. Trinity College, Dublin.

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

Online sources accessed 10 November 2022

www.birdwatchireland.ie

www.NPWS.ie

www.catchments.ie

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www.epa.ie

www.biodiversityireland.ie

Appendix 1: Site Synopses

SITE NAME: DONEGAL BAY SPA SITE CODE: 004151

Donegal Bay SPA is a very large, marine-dominated, site. It extends from Doorin Point, to the west of Donegal Town, to Tullaghan Point in County Leitrim, a distance of approximately 15 km along its north-east/south-west axis. It varies in width from about 3 km to over 8 km. The site includes the estuary of the River Eske, which flows through Donegal Town, and the estuary of the River Erne, which flows through Ballyshannon. Much of the shoreline is rocky or stony, with well-developed littoral reefs in places. There are also extensive stretches of sandy beaches, especially from the Murvagh peninsula southwards to Rosstown and at the outer part of the estuary of the River Erne. Shingle or cobble beaches are also represented. There are extensive areas of intertidal flats associated with the estuary of the River Eske, reflecting the very sheltered conditions in this part of the bay. These have been shown to be biotope rich, and supporting a range of macro-invertebrates, including polychaete worms (*Hediste diversicolor*, *Arenicola marina* and *Nephtys hombergii*) and bivalves (*Scrobicularia plana*, *Cerastoderma edule* and *Macoma balthica*).

Elsewhere, a narrow fringe of intertidal flats is exposed at low tides. Salt marshes are found in the sheltered conditions of the innermost part of the bay. A number of small, grassy, islands occur in the innermost part of the bay. The waters of the shallow bay overlie mostly sandy substrates, though reefs occur in places.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Great Northern Diver, Light-bellied Brent Goose, Common Scoter and Sanderling. The E.U. Birds Directive pays particular attention to wetlands, and as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

Donegal Bay supports an excellent diversity of wintering waterbirds, especially species associated with shallow bays (all figures are mean peak counts for four of the five winters between 1995/96 and 1999/2000). It has an internationally important wintering population of Great Northern Diver (138) and is consistently one of the top sites in the country for this species. It also has one of the few regular populations of Black-throated Diver in the country (11), and Red-throated Diver (21). It supports an internationally important population of Light-bellied Brent Goose (207) and nationally important populations of Common Scoter (860) and Sanderling (68). A range of other species associated with estuarine and shoreline habitats occurs at the site, including Cormorant (29), Shelduck (24), Wigeon (224), Mallard (100), Long-tailed Duck (14), Red-breasted Merganser (38), Oystercatcher (581), Ringed Plover (99), Golden Plover (103), Lapwing (122), Dunlin (269), Bar-tailed Godwit (49), Curlew (359), Redshank (93), Greenshank (12) and Turnstone (53). Gulls are regular in autumn and winter, especially Black-headed Gull (239) and Common Gull (297). This large coastal site is of high ornithological importance, with two species having populations of international importance (Great Northern Diver and Light-bellied Brent Goose) and a further two species having populations of national importance (Common Scoter and Sanderling). Also of note is that five of the regularly occurring species are listed on Annex I of the E.U. Birds Directive, i.e. Great Northern Diver, Black-throated Diver, Red-throated Diver, Golden Plover and Bar-tailed Godwit.

NPWs version date 13.10.2010

SITE NAME: LOUGH MELVIN SAC, SITE CODE: 000428

Lough Melvin is situated in the extreme north-west of Co. Leitrim, about 4 km south of Bundoran. The area is underlain by sedimentary calp-limestone, shale and sandstone. Lough Melvin is an oligo-mesotrophic lake and is approximately 13 km long by 3 km wide. The mean depth of the lake is 8.5 m, the maximum depth being 45 m. A number of inflowing and outflowing streams and rivers are included in the site, for instance, the Drowes River links the lake to Donegal Bay. Several large islands occur on the lake.

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):

[3130] Oligotrophic to Mesotrophic Standing Waters

[6410] *Molinia* Meadows

[1106] Atlantic Salmon (*Salmo salar*)

[1355] Otter (*Lutra lutra*)

The lake has a good diversity of aquatic plants, including Quillwort (*Isoetes lacustris*), Shoreweed (*Littorella uniflora*), Alternate Water-milfoil (*Myriophyllum alterniflorum*), Water Lobelia (*Lobelia dortmanna*), Canadian Waterweed (*Elodea canadensis*) and several species of pondweed (*Potamogeton gramineus*, *P. lucens* and *P. x nitens*). Swamp vegetation is generally sparse, being best developed in the sheltered bay areas. Species include Reeds (*Phragmites australis*), Common Spike-rush (*Eleocharis palustris*) and Common Club-rush (*Scirpus lacustris*).

The most extensive terrestrial habitat in the site is lowland wet grassland. This is highly variable throughout the site in both its species composition and species richness. Grassland ascribable to the E.U. Habitats Directive Annex I type *Molinia* Meadows has been reported by the Irish Semi-natural Grasslands Survey (2009) from Gubacreeny (site no. 802) and Gubalaun (site no. 804). Common species include Jointed Rush (*Juncus articulatus*), Soft Rush (*J. effusus*), Marsh Pennywort (*Hydrocotyle vulgaris*), Yellow Iris (*Iris pseudacorus*), Water Mint (*Mentha aquatica*), Silverweed (*Potentilla anserina*), Creeping Soft-grass (*Holcus mollis*) and Devil's-bit Scabious (*Succisa pratensis*).

Wet deciduous woodland, dominated by Alder (*Alnus glutinosa*), Goat Willow (*Salix caprea*) and Downy Birch (*Betula pubescens*), is common in places. Ground flora species under these canopies include Lesser Burdock (*Arctium minus*), Wild Angelica (*Angelica sylvestris*) and Common Spike-rush (*Eleocharis palustris*).

Drier woodland exists in other areas, with Hazel (*Corylus avellana*), Ash (*Fraxinus excelsior*), Holly (*Ilex aquifolium*) and Hawthorn (*Crataegus monogyna*). Some stands have a rich ground flora that includes Primrose (*Primula vulgaris*), Wood-sorrel (*Oxalis acetosella*), Bluebell (*Hyacinthoides non-scripta*), Honeysuckle (*Lonicera periclymenum*) and Sanicle (*Sanicula europaea*). The fern community is well developed too, with such species as Male-fern (*Dryopteris filix-mas*) and Hart's-tongue (*Phyllitis scolopendrium*) present.

Four plant species which are listed in the Irish Red Data Book, Globeflower (*Trollius europaeus*), Marsh Helleborine (*Epipactis palustris*), Blue-eyed-grass (*Sisyrinchium bermudiana*) and Tea-leaved Willow (*Salix phylicifolia*), are found in this site. Globeflower is also protected under the Flora (Protection) Order, 2015.

The main interest of the site is the unique fish community which the lake supports. Lough Melvin is an excellent example of a natural, post-glacial salmonid lake. A relict population of the Arctic Char (*Salvelinus alpinus*), which constitutes an arctic-alpine element of the Irish fauna, occur there, as

does the Atlantic Salmon (*Salmo salar*). Both of these species are listed in the Irish Red Data Book, and Salmon is listed on Annex II of the E.U. Habitats Directive.

Lough Melvin has three races of Brown Trout (*Salmo trutta*) - Ferox, Sonaghen and Gillaroo - which have distinctive characteristics and separate spawning grounds. The lake's inflowing and outflowing streams which are used for spawning by these Brown Trout races are included in the site.

Otter have been recorded from the Drowes River and the main inflowing rivers, and are likely to be widespread throughout the site. Recently, Pine Marten has been recorded from within the site. Both of these species are listed in the Irish Red Data Book, and Otter is listed on Annex II of the E.U. Habitats Directive.

Moderate numbers of waterfowl use the lake and Greenland White-fronted Goose, a species listed on Annex I of the E.U. Birds Directive, have occasionally been reported from the site.

The lake is used for boating, fishing and water abstraction, while much of the terrestrial part of the site is used for grazing. Consequently, the main threats to the site are from agricultural pollution and recreational pressure.

Lough Melvin is an example of a lake type that is of conservation significance and that is listed on Annex I of the E.U. Habitats Directive. The site is also important for *Molinia* Meadow grassland, Otter and for the presence of a unique fish community, including Atlantic Salmon, a species that is listed on Annex II of the E.U. Habitats Directive, and for a diverse flora which includes a number of rare plants, most notably, the protected Globeflower.

Version date: 9.2.2016

Appendix 2. Bird Data

I-WeBs data for Aughrus point 0A468 Data courtesy of Birdwatch Ireland

SiteCode	Sitename	subsiteCode	Subsite	TaxonomyIOC	SpeciesName	1% National	1% International	2015/16	2016/17	2017/18	2018/19	2019/20
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	270	Light-bellied Brent Goose	350	400	67	70	92	103	137
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	273	Canada Goose					3		
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	318	Mute Swan	90	100	6	14	9	40	39
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	435	Wigeon	560	14000	42	72	42	45	20
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	457	Mallard	280	53000	20	19	13	19	20
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	479	Teal	360	5000		1		3	
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	528	Eider	55	9800	9		224	116	8

0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	544	Common Scoter	110	7500	130	14	270	140	5
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	565	Red-breasted Merganser	25	860	2		1	2	2
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5133	Moorhen				1			
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5411	Great Crested Grebe	30	6300					1
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5562	Oystercatcher	610	8200	117	135	116	124	101
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5646	Golden Plover	920	9300		43			
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5657	Ringed Plover	120	540	28	44	26	50	21
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5806	Curlew	350	7600	29	32	53	68	18
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5826	Turnstone	95	1400	38	28	31	48	49

0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5837	Knot	160	5300					24
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5856	Sanderling	85	2000			7	82	2
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5859	Dunlin	460	13300	20	150	155	103	159
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5875	Purple Sandpiper	20	110					16
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5927	Snipe					1	1	
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5963	Redshank	240	2400	9	10	7	15	10
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	5973	Greenshank	20	3300		2	4		
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6089	Black-headed Gull			7	28	58	2	65
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6122	Common Gull			147	69	54	57	91

0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6131	Great Black-backed Gull			4	5	21	6	7
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6152	Herring Gull			145	146	140	184	341
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6165	Lesser Black-backed Gull						1	
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6303	Common Guillemot			3		1		
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6310	Razorbill					1	28	
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6316	Black Guillemot			3				
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6388	Red-throated Diver	20	3000	6	3	3	10	24
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6389	Black-throated Diver			1	1	3	1	
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6393	Great Northern Diver	20	50	4	12	7	9	7

0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6739	Gannet						50	
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6814	Cormorant	110	1200	5	13	11	6	12
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	6821	Shag			6	17	4	1	4
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	7058	Grey Heron	25	5000	4	4	2	4	3
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	11122	Kestrel						1	1
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	11185	Merlin							1
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	11229	Peregrine Falcon				1			
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	20107	Chough							2
0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	26921	Ring Ouzel			12	22		28	

0A405	Donegal Bay	0A468	Aughrus Pt - Bundoran	28102	Dipper							1	
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Table 1. I-Webs Data for Aughris Point subsite 0A468. SCI species highlighted in red.

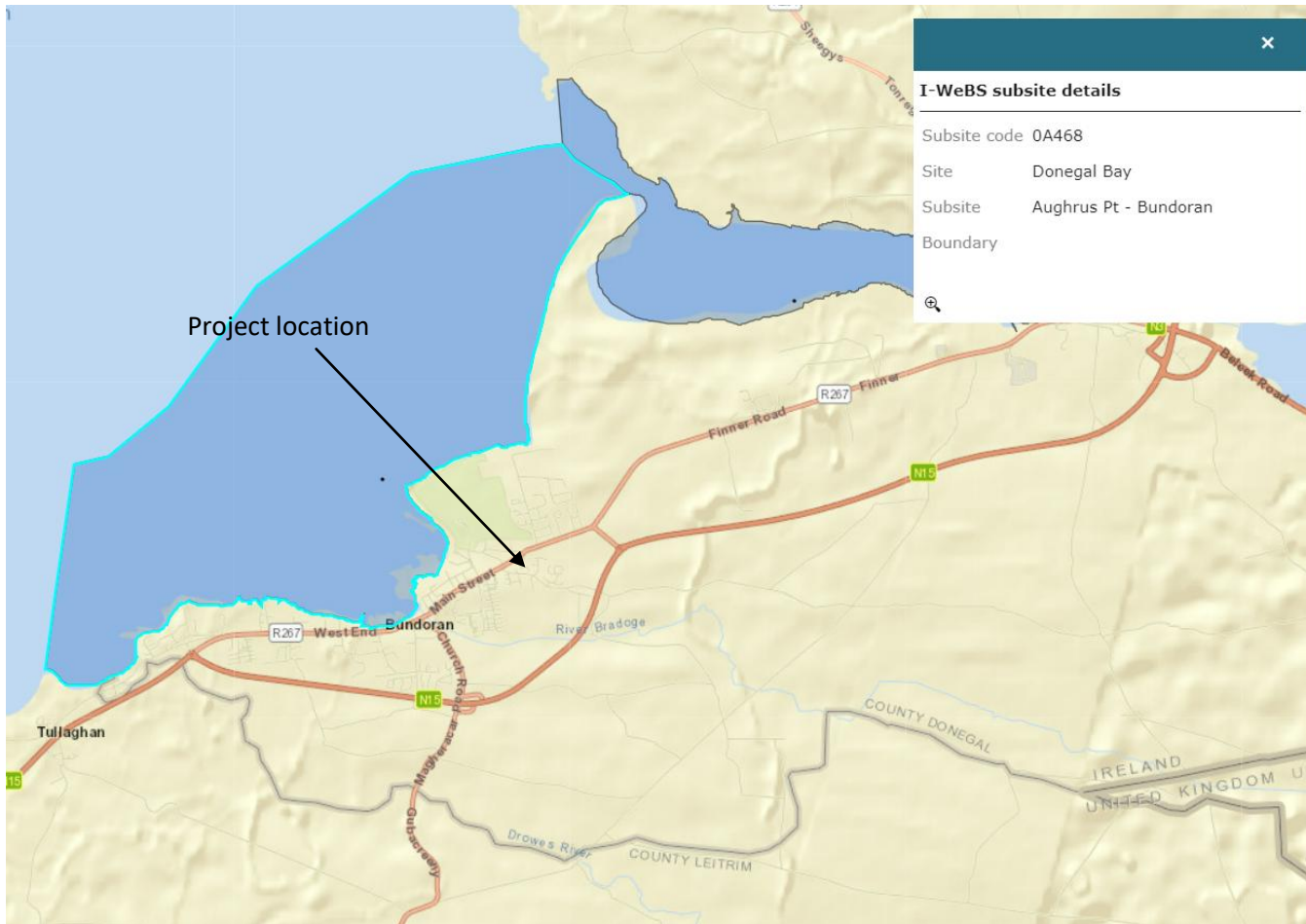


Figure 1. Project location in wider context of I-WeBs subsite Aughris Point (0A468) (Map source birdwatchireland.ie).