



**Comhairle Contae
Dhún na nGall**
Donegal County Council

**Appropriate Assessment (AA) Screening of
the proposed Carndonagh Town Centre
Regeneration Project** in the townland of
Churchland Quarters, Carndonagh in the
Inishowen Municipal District

In Line with the Requirements of Article 6 (3) of the EU
Habitats Directive

Regeneration and Development Team
Directorate of Community Development & Planning Services
September 2020

1 Introduction

1.1 Background

Donegal County Council is proposing to carry out a local authority own development in the townland of Churchland Quarters, Carndonagh in accordance with the provisions of Part XI of the Planning and Development Act 2000 (as amended) and Part VIII of the Planning and Development Regulations 2001 (as amended) for inter alia :

- Partial demolition of the former Leprechaun Bar to create a new through access and change of use (of retained structure) to public amenities including a changing places facility,
- Restoration, refurbishment, alteration and extension of the former McDonagh Bros. Department Store and associated outbuildings to the rear providing for:
 - i. a new Digital Fabrication Laboratory (FabLab) and co-working Hub, office space, board room training room/exhibition space, kitchenette and toilets,
 - ii. a Social Space for Young People and Teenagers including a study hub, social room, kitchenette and toilets,
 - iii. a community Kitchen,
 - iv. Communal storage, and
 - v. A public realm courtyard with sensory garden.
- Creation of a new Pedestrian Street and public realm park between Pound Street/Bank Place and the Supervalu Retail Complex and the restoration, refurbishment and alteration of an existing stone outbuilding adjoining same to a Creative Makers Hub including a communal workshop and retail space for creative and craft industries;
- New demountable canopy feature(s) in the existing Diamond area civic space;
- New public realm improvements on Back Lane connecting the Diamond to the Town Car Park and Bridge Street including new surface materials, lighting scheme, murals, demolition of existing car park boundary wall and construction of a new replacement car park boundary wall; and
- All associated ancillary works to include site drainage, connection to public water supply and other services, landscaping, development related signage & public art, connection & discharge to the public sewerage network.

All associated ancillary site works shall be located within the townland of Churchland Quarters, Carndonagh in the Inishowen Municipal District.

This document comprises the Appropriate Assessment Screening of the proposed development in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/443/EEC).

The purpose of the screening exercise is to determine whether the proposed development could have significant effects on the Natura 2000 network of European sites (commonly known as Natura 2000 sites) within the zone of influence of the proposed development (within 15km of the development boundary), either alone or in combination with other plans or projects, and consider whether these impacts are likely to be significant.

Natura 2000 sites are protected habitats for flora and fauna of European importance and comprise Special Areas of Conservation (SACs) designated under the EU Habitats Directive (92/43/EEC) and Special Protection Areas (SPAs) designated under the Birds Directive (79/409/EEC).

1.2 Legislative Context

1.2.1 Habitats Directive and Appropriate Assessment

The aim of the EU Habitats Directive (92/443/EEC) is to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. The Directive recognises that in the European territory of the Member States, natural habitats are continuing to deteriorate and an increasing number of wild species are seriously threatened. In order to ensure the restoration or maintenance of natural habitats and species of Community interest at a favourable conservation status, it is necessary for Member States to designate special areas of conservation in order to create a coherent European ecological network. Criteria for site designation are set out in the Directive. The network of sites is referred to as Natura 2000 and includes SACs (including candidate SACs) and SPAs (including proposed SPAs).

The Natura 2000 network of European sites is comprised of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. SACs are selected for the conservation of habitats listed in Annex I of the Habitats Directive, and for species of animals (other than birds) and plants listed in Annex II. SPAs are selected for the conservation of birds listed in Annex I of the Birds Directive (Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version of Council Directive 79/409/EEC as amended)) and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site has been selected are the qualifying interests of the sites, and the conservation objectives of the site are based on these qualifying interests.

Crucially, the Habitats Directive requires that an AA must be made of any plan or programme that is likely to have a significant effect on the conservation objectives of designated sites i.e. on SACs or SPAs, before any decision can be made to allow that plan or project to proceed. Article 6(3) of the Habitats Directive states that:

“Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site’s conservation objectives. In 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.”

In the event that an assessment determines that there is a likelihood of an adverse affect, Article 6(4) makes provision for a plan or project to proceed under certain restricted circumstances. Article 6(4) states that:

“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.”

The application of AA in Ireland, as required by the Habitats Directive, is primarily governed by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011 as amended by S.I. No. 355 of 2015), and the Planning and Development (Amendment) Act 2010 (Part XAB), as amended by the Environment (Miscellaneous Provisions) Act 2011. A range of guidance on carrying out appropriate assessment, and interpretation of relevant legislation is available including inter alia:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. Department of Environment, Heritage and Local Government, 2009.
- Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC. European Commission, 2000.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6 (3) and (4) of the Habitats Directive 92/43/EEC. European Commission, 2002.
- Guidance Document on Article 6 (4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence. Opinion of the European Commission. European Commission, 2007 / 2012.
- Nature and biodiversity cases: Ruling of the European Court of Justice. European Commission. 2006.
- Habitats Directive and environmental assessment of plans and projects. García Ureta, A. Journal for European Environmental and Planning Law 2, 84-96, 2007.
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10.
- Compliance Conditions in respect of Developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites. Circular letter PD 2/07, NPWS 1/07
- Compliance of Existing Land Use Plans with the EU Habitats Directive. Department of Environment, Heritage and Local Government (2011) Circular Letter PSSP 5/2011.

1.2.2 The Process of Appropriate Assessment

While there is no prescribed method for undertaking Appropriate Assessment (AA), or form or content for reporting, methodological guidance promotes a four-stage process to complete the AA. The requirements for individual stages are summarised in Table 1.1.

An important aspect of the AA process is that the outcome at each successive stage determines whether a further stage in the process is required. Stages 1 and 2 relate to Article 6(3) of the Habitats Directive and are concerned with the strict protection of sites; Stages 3 and 4 relate to Article 6(4) which is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

Ultimately the proposed development may only be carried out if the AA process reaches completion and has ascertained beyond reasonable scientific doubt that it shall not adversely affect the integrity of a European site, or in the absence of alternative solutions, imperative reasons of overriding public interest (IROPI) can be established as required under Section 177W, Part XAB, Planning and Development Act 2000 (as amended). In the latter scenario compensatory measures are required to offset any damage to the Natura 2000 network of European sites.

Table 1.1: Stages in the Process of Habitats Directive Appropriate Assessment

Stage	Task
1	<p>Screening</p> <p>Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3): i) whether a plan or project is directly connected to or necessary for the management of the site, and ii) whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives. If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA).</p> <p>Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact.</p>
2	<p>Appropriate Assessment</p> <p>This stage considers whether the plan or project, alone or in combination with other projects or plans, will have adverse effects on the integrity of a Natura 2000 site, and includes any mitigation measures necessary to avoid, reduce or offset negative effects. The proponent of the plan or project will be required to submit a Natura Impact Report/Natura Impact Statement, i.e. the report of a targeted professional scientific examination of the plan or project and the relevant Natura 2000 sites, to identify and characterize any possible implications for the site in view of the site's conservation objectives, taking account of in combination effects. This should provide information to enable the competent authority to carry out the appropriate assessment. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded, then the process must proceed to Stage 4, or the plan or project should be abandoned.</p>
3	<p>Alternative Solutions</p> <p>This stage examines any alternative solutions or options that could enable the plan or project to proceed without adverse effects on the integrity of a Natura 2000 site. The process must return to Stage 2 as alternatives will require appropriate assessment in order to proceed. Demonstrating that all reasonable alternatives have been considered and assessed, and that the least damaging option has been selected, is necessary to progress to Stage 4.</p>
4	<p>Imperative Reasons of Overriding Public Interest (IROPI)/Derogation</p> <p>Stage 4 is the main derogation process of Article 6(4) which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project that will have adverse effects on the integrity of a Natura 2000 site to proceed in cases where it has been established that no less damaging alternative solution exists.</p> <p>The extra protection measures for Annex I priority habitats come into effect when making the IROPI case. Compensatory measures must be proposed and assessed. The Commission must be informed of the compensatory measures. Compensatory measures must be practical, implementable, likely to succeed, proportionate and enforceable, and they must be approved by the Minister.</p>

2 Screening for Appropriate Assessment

2.1 Introduction to Screening

This screening for AA, or Stage 1 of AA, has been undertaken in accordance with and having regard to the following:

- Article 6 of the Habitats Directive 92/43/EEC.
- DECLG Guidelines for Planning Authorities entitled 'Appropriate Assessment of Plans and Projects in Ireland', (Department of Environment, Heritage and Local Government, 2010 revision).
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10.
- Circular letter PD 2/07, NPWS 1/07 & PSSP 5 2011.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6 (3) and 6 (4) of the Habitats Directive 92/43/EEC, European Commission, 2001.
- Guidance Document on Article 6 (4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence. Opinion of the European Commission (European Commission, January 2007).

This stage of the process identifies any likely significant affects to European Sites from a project or plan, either alone or in combination with other projects or plans. Screening determines whether appropriate assessment is necessary by examining:

- Whether a plan or project is directly connected to or necessary for the management of the site; and
- Whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.

The European Commissions' Methodological Guidance (listed above) outlines four sub-steps within the screening exercise as follows:

1. Determining whether the project or plan is directly connected with or necessary to the management of the site;
2. Describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 sites;
3. Identifying the potential effects on the Natura 2000 sites;
4. Assessing the significance of any affects on the Natura 2000 sites.

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

2.2 Is the Project or Plan Directly Connected with or Necessary to the Management of the Natura 2000 Sites?

The Methodological Guidance outlines that for a project or plan to be 'directly connected with or necessary to the management of the site', the management component must refer to management measures that are for conservation purposes, and the 'directly' element refers to measures that are solely conceived for the conservation management of a site and not direct or indirect consequences of other activities.

It can be concluded at the outset that the project is not directly connected with or necessary to the management of the Natura 2000 sites in the County.

2.3 Description of the Application Site and Environs

The subject site is located in the core town centre of Carndonagh as set out hereunder:

- The Leprechaun Bar is a modest two-storey building at Bank Place between the Diamond and Pound Street within the town centre of Carndonagh. It is currently vacant/not in use. It is adjoined by the former McDonagh Bros Department Store known locally as 'Mary Reids'. It is a three-storey building of significant scale on the streetscape also located at Bank Place. The building is currently in a vacant state and 'for sale'. To the rear are a number of outhouses, mostly stone built and of two-storey scale which are in a degraded state of repair. It is proposed to refurbish, alter, part-demolish and extend these buildings as a part of the regeneration of the site. The Leprechaun Bar will be part demolished by the breaking through of an opening to give access to the rear of the site and an internal courtyard public realm space. The access will primarily be pedestrian with restricted vehicular access for deliveries and primarily access to a changing places facility. The structure to be retained will be primarily redeveloped to provide public amenities consisting of toilets including a changing places facility for individuals with complex care needs. The McDonagh Bros building will be transformed into a digital fabrication laboratory, reception area, board room/teleconference/training room, co-working hub, office accommodation, kitchenette, storage, toilets, lift and stairwell. The external outhouses will be transformed into: a social space for young people and teenagers, a community kitchen and storage. The internal courtyard will be developed as a public realm with sensory garden.

The general environment of the site is one of a traditional market town centre environment. The Leprechaun Bar and McDonagh Bros building form part of a terraced streetscape and are adjoined by buildings of similar character. They are street frontage buildings adjoined by the public footpath and kerbside parking. To the rear the area of the site is generous before backing onto a private laneway, and a newly constructed road which serves the local Parish Church and attendant grounds before progressing to the Barrick Hill Community Park.

The buildings are serviced by mains services.

- Opposite the Leprechaun Bar and McDonagh Bros building, are 2no. dwellinghouses including a gated access which provides rear access to the rear of the parent landholding. This land holding falls across the site to connect with the Supervalu Retail Complex. Within this holding there is an existing two-storey barn type building, formerly in use as a shirt factory amongst other historical uses. It is proposed to transform this site to provide a critical pedestrian link between the Supervalu Retail Complex and the traditional retailing Diamond area of the town centre. This link will be provided by creating a new urban park and pedestrian street. The link will be designed in such a way as to accommodate access by all abilities with a series of ramps at a gradient of 1:20 meandering up the site to give form to the urban park. The urban park will be punctuated by places to rest, shelter, perform etc and will be landscaped to ensure appropriate biodiversity and

green space. Once a suitable level is reached the link will take the form more typical of a street at approx. 4m width as it passes a proposed creative hub. The existing stone barn will be transformed to a creative hub which will provide for a communal workshop at first floor level consisting of a print room and workshop/training room for designer makers. At ground floor level there will be a ceramic workshop and shared retail space. The 2no. dwellings shall remain in private ownership. The environment is one of backland development, which is underdeveloped. The site is adjoined by similar plots with comparative potential and the towns agricultural mart. It is considered that these back lands which exist between the Diamond and the Supervalu Complex have significant commercial potential.

- The proposed canopies are located within the existing Diamond Civic Space, a small space in the heart of the town centre which facilitates Saturday markets, other events and is the site of the towns Christmas tree. The environment is decoratively paved, with stone walling, landscaping and seating. The Traders Association expressed a view that the capacity of the space to serve business and trading could be increased if canopies were installed. The public consultation was favourable to this idea provided it was not a permanent intervention and did not displace the Christmas Tree. Accordingly a demountable or retractable model is proposed.
- Finally a public realm scheme on Back Lane is also proposed. This is an existing public road which connects the Diamond with Bridge Street, having passed the Town Car Park. A new paving and lighting scheme is proposed with a view to making the Lane more attractive, safer and viable to use and better connecting the Town Car Park option with the Diamond area as a result.

The entire site is located within the 'town centre' as designated in the Carndonagh land use zoning map (Map 5) contained in the Seven Strategic Towns Local Area Plan 2018-2024.

2.4 Description of the Proposed Development

The proposed development consists of:

- Partial demolition of the former Leprechaun Bar to create a new through access and change of use (of retained structure) to public amenities including a changing places facility,
- Restoration, refurbishment, alteration and extension of the former McDonagh Bros. Department Store and associated outbuildings to the rear providing for:
 - i. a new Digital Fabrication Laboratory (FabLab) and co-working Hub, office space, board room training room/exhibition space, kitchenette and toilets,
 - ii. a Social Space for Young People and Teenagers including a study hub, social room, kitchenette and toilets,
 - iii. a community Kitchen,
 - iv. Communal storage, and
 - v. A public realm courtyard with sensory garden.
- Creation of a new Pedestrian Street and public realm park between Pound Street/Bank Place and the Supervalu Retail Complex and the restoration, refurbishment and alteration of an existing stone outbuilding adjoining same to a Creative Makers Hub including a communal workshop and retail space for creative and craft industries;
- New demountable canopy feature(s) in the existing Diamond area civic space;
- New public realm improvements on Back Lane connecting the Diamond to the Town Car Park and Bridge Street including new surface materials, lighting scheme, murals, demolition of existing car park boundary wall and construction of a new replacement car park boundary wall; and

- All associated ancillary works to include site drainage, connection to public water supply and other services, landscaping, development related signage & public art, connection & discharge to the public sewerage network.

All associated ancillary site works shall be located within the townland of Churchland Quarters, Carndonagh in the Inishowen Municipal District.

2.4.1 Other Projects with Potential for In-combination Impacts

Where a plan or project is likely to have a significant effect on a European site, either alone or in combination with other plans or projects it is subject to AA. The in-combination test should include completed, approved but uncompleted, or proposed (but not yet approved) plans or projects if sufficient detail is available for assessment. The consideration of cumulative effects includes the sum total of influences affecting the condition of Natura sites.

Cumulative effects are perhaps most obvious in the case of space crowding of activities that taken in isolation would be sub-threshold in terms of significance in affecting Natura sites. However, long delays between cause and effect can result in time lags for in-combination effects to materialise in some instances (e.g. changes in flow regimes due to forestry or drainage). Some in combination effects may be synergistic (e.g. lower flows combined with increased pollutant loads). Other effects can be secondary in nature (e.g. windfarm road access resulting in recreational disturbance of previously inaccessible areas). In all cases a precautionary approach is taken in the assessment.

There are currently no known projects in project development stage or other that are considered to have potential for in-combination impacts.

Accordingly it can be concluded that no significant adverse in combination impacts on the conservation status or integrity of Natura 2000 sites are likely to arise as a result of the proposed development.

2.5 Identification of Natura 2000 sites that may be affected

Best practice typically assumes that the zone of influence of a plan or project extends 15km beyond the area covered by the plan or project. This is in line with DECLG Guidelines (2010) and ensures that all potentially affected Natura 2000 sites are included in the screening process. All Natura sites occurring in the zone of influence of the proposed Carndonagh Town Centre Regeneration Project (i.e. including the 15km buffer zone) are listed in Table A1, Appendix A: Natura 2000 Sites Relevant to this Appropriate Assessment Screening – along with their qualifying interests, conservation objectives and threats to site integrity.

The richly diverse environment has led to the designation of a large number of European, National and locally important sites across County Donegal. There are a total of 73 Natura 2000 sites (both terrestrial and marine) within County Donegal comprising 47 Special Areas of Conservation (SAC) and 26 Special Protection Areas (SPA).

There are a total of 5 Natura 2000 sites located within the zone of influence of the proposed development (a 15km buffer area) as listed in Table 2.1. These Natura 2000 sites comprise 2no. SACs and 3no. SPAs. None of identified Natura 2000 sites are located within the application site.

Table 2.1: List of Natura 2000 Sites within a 15km buffer of the proposed Carndonagh Town Centre Regeneration Project site

Site Type	Site Code	Site Name	Located within the proposed development boundary	Located within a 15km radius of the proposed development	Distance of the Natura site from the proposed development
County Donegal					
SAC	002012	North Inishowen Coast	No	Yes	c. 2.74km
SAC	000168	Magheradrumm an Bog	No	Yes	c. 4.6km
SPA	004034	Trawbreaga Bay	No	Yes	c. 2.74km
SPA	004146	Malin Head	No	Yes	c. 12.2km
SPA	004087	Lough Foyle	No	yes	c. 14km

2.6 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 listed in the Habitats and Birds Directives. Site-specific detailed conservation objectives have been developed for SACs and SPAs, and aim to define favourable conservation conditions for a particular habitat or species at that site.

Favourable conservation status of a habitat is achieved when:

- Its natural range, and area 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 favourable conservation status of a species is achieved when:

- 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 on a long-term basis.

2.7 Identification of Potential effects on Natura 2000 sites

The potential impacts from the proposed development are assessed in the context of a number of factors that could, in the absence of mitigation, affect the integrity of Natura sites. These include direct impacts arising from development, and indirect impacts associated with resource demand and emissions. Such impacts may result from:

- Land take for infrastructural developments
- Creating barriers or severing links of mobile species
- Air emissions
- Water demand/wastewater treatment

- Additional drainage works and changes in landuse
- Disturbance of sensitive habitats or species due to tourism and recreation
- Landscape management, development and urbanisation
- Interference with mitigation measures of other plans

Impact can manifest itself as:

- Habitat loss within Natura sites
- Network fragmentation through loss of linking ecological corridors
- Species disturbance in terms of feeding, breeding, migration or roosting
- Reduction in species density, population size or reproductive capacity
- Changes in available water resource – quality and quantity
- Changes in soil properties

2.8 Assessment Criteria

In order to assess any potential impact of the implementation of the proposed Carndonagh town centre regeneration project on the relevant Natura 2000 sites identified in Section 2.5 above, an impact screening matrix was developed to assess the proposed development and to determine the likelihood of potential significant impact, both in-situ and ex-situ. This screening matrix is presented in Appendix B.

2.8.1 Direct, Indirect or Secondary Impacts

It is concluded from Table 2.1 above that none of the Natura 2000 sites lie within the boundaries of the proposed development area; therefore, no direct impacts will occur through landtake or fragmentation of habitats.

The closest Natura 2000 sites to the subject site is the North Inishowen Coast SAC (002012) and Trawbreaga Bay SPA (004034), which are approximately 2.74 km to the north of the site. Magheradrumman Bog SAC is the next closest Natura 2000 site at an approximate remove of 4.6km from the subject site.

It is considered that the other identified Natura 2000 sites within the potential zone of influence of the subject site (15kms) are at a sufficient remove from the site at 12.2km (Malin Head SPA) and 14km (Lough Foyle SPA) respectively and that there is no likelihood of indirect or secondary impacts on those sites. Given the limited scale of the works proposed within a town centre environment, the physical remove from the sites and the absence of any pathways it is considered that there will be no risk of impact or disturbance to the ornithology, flora or fauna of either site.

Trawbreaga Bay is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Barnacle Goose, Light-bellied Brent Goose and Chough. 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. The proposed development primarily consists of and can be characterised by refurbishment and restorative works to existing vacant buildings within the town centre environment of Carndonagh together with public realm improvements to the existing civic infrastructure of the town centre environment. The development and the range of use(s) proposed will not pose a risk of disturbance to ornithology within the site either at construction or operational stage. The development will discharge to mains services and whilst there is linkage between these services and the site, via storm water and the Donagh River and wastewater to the municipal WWTP, the development will not result in significant storm water discharges and will not pose a risk of siltration or pollutants. The PE loadings will also be non-material given the re-purposing of existing buildings within a town centre environment.

The North Inishowen Coast SAC stretches from Crummies Bay in the west up to Malin Head and back down to Inishowen Head to the east. It is a Natura 2000 of significant scale which for the most part is at a significant remove from the site, coming into closest proximity in the area of Trawbreaga Bay where it shares a designation extent with the SPA. It encompasses an excellent variety of coastal habitats including high rocky cliffs, offshore islands, sand dunes, saltmarsh, a large intertidal bay, and rocky, shingle and sand beaches. There are excellent raised beaches along the east coast including the oldest and best preserved late-glacial fossil coast in Ireland (between Ineuran Bay and Esky Bay). Indeed it is the only well preserved such coast in Europe and so is of international importance. Also of geomorphological interest is the small area of stone polygons near Malin Tower. The site is a Special Area of Conservation (SAC) selected for a number of Annex I and Annex II habitats and species. The subject site has no connection or potential relationship with the greater extents of this Natura 2000 site. The development and the range of use(s) proposed will not pose a risk of disturbance to ornithology within the site either at construction or operational stage. The development will discharge to mains services and whilst there is linkage between these services and the site, via storm water and the Donagh River and wastewater to the municipal WWTP, the development will not result in significant storm water discharges and will not pose a risk of siltration or pollutants. The PE loadings will also be non-material given the re-purposing of existing buildings within a town centre environment and the discharge to a relatively recent WWTP which provides a tertiary level of treatment, is licensed by the EPA and operating within capacity.

Magheradrumman Bog contains highland blanket bog, wet heath and includes two upland lakes, Lough Fad and Lough Inn. The site is located approximately 8 km north-west of Moville, on the Inishowen Peninsula in Co. Donegal, and stretches from its highest point, Croaghmore (301 m above sea-level), north-westwards towards Shores Hill. The most low-lying point lies between the Black and Lorghinn Rivers (160 m above sea level). 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: Wet Heath, and Blanket Bogs.

The site has important ornithological interests, with breeding Golden Plover (8 pairs in 1997), Dunlin (5 pairs in 1998) and Red Grouse. Golden Plover is listed on Annex I of the E.U. Birds Directive and, along with Dunlin, is listed as threatened in the Red Data Book. The rare Arctic Char (*Salvelinus alpinus*) occurs in Lough Fad. It is the only salmonid in the lake, a unique situation in Ireland. The site also provides habitat for the Irish Hare. Both of these species are listed as threatened in the Irish Red Data Book. Blanket bogs are threatened by turf-cutting, afforestation and over-grazing. These three factors have led to the reduction of this habitat in Ireland. Magheradrumman Bog is important as one of the most northerly examples of blanket bog in Ireland. The presence of good quality wet heath and of rare species adds to its scientific and conservation value of the site as a whole.

The subject site and proposed development is at a significant physical remove from this site, and has no connection with the site, hydrologically or other. The proposed development will present no risk of disturbance to ornithology within the site and presents no risk to the wet heath and blanket bogs habitat.

The proposed development will otherwise proceed in accordance with best practice construction techniques to prevent any risk of accidental release of pollution to storm drains from either hydrocarbons or soiled/sediment laden waters or concrete products. These construction techniques will include the implementation of sediment traps & silt screens in drainage lines before discharge to services, an appropriate location for the site compound(s) at a remove from drainage lines or pathways to same and the presence of on-site spill kits. In addition bio-security measures will be in place to ensure that the limited soils to be imported in the landscaping/green elements of the urban park and sensory garden are screened to prevent the introduction of invasive species. These steps will be introduced as best practice measures and not as mitigation measures and will eliminate any risk of accidental pollution of waters.

It is therefore concluded that the impacts of the construction and operation of the proposed development on the ecology of the area will not be significant.

2.8.2 Likely Changes to the Site

The likely changes that will arise from the proposed development have been examined in the context of a number of factors that could potentially affect the integrity of the identified Natura 2000 Sites. Overall, it has been found that the implementation of the proposed development will not affect the integrity of Natura 2000 Sites (see Table 2.3).

Table 2.3: Likely Affects on Natura 2000 Sites

Site Name	Habitat Loss within Natura sites	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key indicators of Conservation Value (Water Quality etc.)	Changes in Soil Properties
Trawbreaga Bay	None	None	None	None	None	None
North Inishowen Coast	None	None	None	None	None	None
Malin Head	None	None	None	None	None	None
Magheradrumman Bog	None	None	None	None	None	None
Lough Foyle	None	None	None	None	None	None

2.8.3 Elements of the Project where the Impacts are Likely to be Significant

No elements of the proposed Carndonagh town centre regeneration project are likely to cause significant impacts.

3 Conclusions

Stage 1 Screening for Appropriate Assessment (AA) of the proposed Carndonagh town centre regeneration project has been carried out (see Table B.1 in Appendix B of this report). The purpose of the screening exercise is to determine whether the proposed development could have significant effects on the Natura 2000 network of European sites within the zone of influence of the proposed development, either alone or in combination with other plans or projects, and consider whether these impacts are likely to be significant.

It has been determined that an appropriate assessment of the proposed development is not required as it can be excluded on the basis of objective scientific information that the proposed development individually or in combination with other plans/projects will have a significant effect on a European Site.

This determination is made in view of the conservation objectives of the habitats or species for which these sites (considered in this report) have been designated.

**Regeneration & Development Team
September 2020**

APPENDIX A
Natura 2000 Sites Relevant to this Appropriate
Assessment Screening

Table A1: Special Areas of Conservation (SACs) within 15km of the Proposed Carndonagh Town Centre Regeneration Project in Churuchland Quarters, Carndonagh, Inishowen Municipal District.

Site code	Site name	Qualifying interests	Conservation objectives	Negative Impacts (Threats and Pressure Code)*
004034	Trawbreaga Bay	<p>Barnacle Goose (<i>Branta leucopsis</i>) [A045]</p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Chough (<i>Pyrhacorax pyrrhacorax</i>) [A346]</p> <p>Wetland and Waterbirds [A999]</p>	<p>To maintain the favourable conservation condition of Barnacle Goose in Trawbreaga Bay SPA</p> <p>To maintain the favourable conservation condition of Light-bellied Brent Goose in Trawbreaga Bay SPA</p> <p>To maintain the favourable conservation condition of Chough in Trawbreaga Bay SPA</p> <p>To maintain the favourable conservation condition of the wetland habitat in Trawbreaga Bay SPA as a resource for the regularly-occurring migratory waterbirds that utilise it</p>	<p>Grazing,</p> <p>Fertilisation,</p> <p>Discharges,</p> <p>Dispersed Habitation,</p> <p>Marine & Freshwater Acquaculture</p>
002012	North Inishowen Coast	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Perennial vegetation of stony banks [1220]</p> <p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Machairs (* in Ireland) [21A0]</p> <p>European dry heaths [4030]</p> <p>Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]</p> <p>Lutra lutra (Otter) [1355]</p>	<p>To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in North Inishowen Coast SAC</p> <p>To maintain the favourable conservation condition of Perennial vegetation of stony banks in North Inishowen Coast SAC</p> <p>To maintain the favourable conservation condition of Vegetated sea cliffs of the Atlantic and Baltic coasts in North Inishowen Coast SAC</p> <p>To restore the favourable conservation condition of Fixed Coastal Dunes with herbaceous vegetation (Grey Dunes) in North Inishowen SAC</p> <p>To restore the favourable conservation condition of Machairs in the North Inishowen Coast SAC</p> <p>To maintain favourable conservation condition of European Dry Heaths in North Inishowen Coast SAC</p> <p>To maintain favourable conservation</p>	<p>Removal of beach materials</p> <p>Intensive horse grazing</p> <p>Outdoor sports, leisure & recreational activities</p> <p>Fishing Harbours</p> <p>Interpretivecentres</p>

Site code	Site name	Qualifying interests	Conservation objectives	Negative Impacts (Threats and Pressure Code)*
			condition of Narrow-mouthed Whorl Snail in North Inishowen SAC To maintain favourable conservation condition of Otter in North Inishowen Coast SAC	
000168	Magheradrumman Bog	Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] Blanket bogs (* if active bog) [7130]	To restore the favourable conservation condition of Northern Atlantic wet heaths with <i>Erica tetralix</i> in Magheradrumman Bog SAC To restore the favourable conservation condition of Blanket bogs (* if active bog) in Magheradrumman Bog SAC	Off-road motorized driving Modification of hydrographic functioning, general Mechanical removal of peat Roads, paths & trial roads
004146	Malin Head	Corncrake (<i>Crex crex</i>) [A122]	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: Corncrake (<i>Crex crex</i>)	Cultivation Mowing/Cutting grassland Grazing Discontinuous urbanisation
004087	Lough Foyle	Red-throated Diver (<i>Gavia stellata</i>) [A001] Great Crested Grebe (<i>Podiceps cristatus</i>) [A005] Bewick's Swan (<i>Cygnus columbianus bewickii</i>) [A037] Whooper Swan (<i>Cygnus cygnus</i>) [A038] Greylag Goose (<i>Anser anser</i>) [A043] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Wigeon (<i>Anas penelope</i>) [A050] Teal (<i>Anas crecca</i>) [A052] Mallard (<i>Anas platyrhynchos</i>)	To maintain the favourable conservation condition of Great Crested Grebe in Lough Foyle SPA To maintain the favourable conservation condition of Bewick's Swan in Lough Foyle SPA To maintain the favourable conservation condition of Whooper Swan in Lough Foyle SPA To maintain the favourable conservation condition of Greylag Goose in Lough Foyle SPA To maintain the favourable conservation condition of Light-bellied Brent Goose in Lough Foyle SPA To maintain the favourable conservation condition of Shelduck in Lough Foyle SPA To maintain the favourable conservation condition of Wigeon in Lough Foyle SPA To maintain the favourable conservation condition of Teal in Lough Foyle SPA To maintain the favourable conservation condition of Mallard in Lough Foyle SPA To maintain the favourable conservation	Urbanised areas, human habitation

Site code	Site name	Qualifying interests	Conservation objectives	Negative Impacts (Threats and Pressure Code)*
		<p>[A053] Eider (<i>Somateria mollissima</i>) [A063] Red-breasted Merganser (<i>Mergus serrator</i>) [A069] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Lapwing (<i>Vanellus vanellus</i>) [A142] Knot (<i>Calidris canutus</i>) [A143] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Common Gull (<i>Larus canus</i>) [A182] Herring Gull (<i>Larus argentatus</i>) [A184] Wetland and Waterbirds [A999]</p>	<p>condition of Eider in Lough Foyle SPA To maintain the favourable conservation condition of Red-breasted Merganser in Lough Foyle SPA To maintain the favourable conservation condition of Oystercatcher in Lough Foyle SPA To maintain the favourable conservation condition of Golden Plover in Lough Foyle SPA To maintain the favourable conservation condition of Lapwing in Lough Foyle SPA To maintain the favourable conservation condition of Knot in Lough Foyle SPA To maintain the favourable conservation condition of Dunlin in Lough Foyle SPA To maintain the favourable conservation condition of Bar-tailed Godwit in Lough Foyle SPA To maintain the favourable conservation condition of Curlew in Lough Foyle SPA To maintain the favourable conservation condition of Redshank in Lough Foyle SPA To maintain the favourable conservation condition of Black-headed Gull in Lough Foyle SPA To maintain the favourable conservation condition of Common Gull in Lough Foyle SPA To maintain the favourable conservation condition of Herring Gull in Lough Foyle SPA To maintain the favourable conservation condition of the wetland habitat in Lough Foyle SPA as a resource for the regularly occurring waterbirds that utilise it.</p>	

APPENDIX B
**Impact Assessment Screening Matrix for the Proposed
Carndonagh Town Centre Regeneration Project**

Table B.1: Impact Assessment Screening Matrix for Proposed Carndonagh Town Centre Regeneration project in Churchland Quarters, Carndonagh, Inishowen Municipal District.

Proposed development	Natura 2000 Sites That May Be Affected	Potential Impact of Proposed development	Risk of Significant Impact	Potential of In-Combination Impacts	Risk of Significant In-Combination Impacts'	Appropriate Assessment Screening
Partial demolition of the former Leprechaun Bar to create a new through access and change of use (of retained structure) to public amenities including a changing places facility,	Potentially all sites within the zone of influence of the proposed development.	Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.	Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.	Unlikely	Unlikely	No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development would therefore not necessitate Stage 2 AA.
Restoration, refurbishment, alteration and extension of the former McDonagh Bros. Department Store and associated outbuildings to the rear providing for: a new Digital Fabrication	Potentially all sites within the zone of influence of the proposed development.	Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.	Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.	Unlikely	Unlikely	No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development would therefore not necessitate Stage 2 AA.

Proposed development	Natura 2000 Sites That May Be Affected	Potential Impact of Proposed development	Risk of Significant Impact	Potential of In-Combination Impacts	Risk of Significant In-Combination Impacts'	Appropriate Assessment Screening
<p>Laboratory (FabLab) and co-working Hub, office space, board room training room/exhibition space, kitchenette and toilets; a Social Space for Young People and Teenagers including a study hub, social room, kitchenette and toilets; a community Kitchen; Communal storage; and A public realm courtyard with sensory garden.</p>						

Proposed development	Natura 2000 Sites That May Be Affected	Potential Impact of Proposed development	Risk of Significant Impact	Potential of In-Combination Impacts	Risk of Significant In-Combination Impacts'	Appropriate Assessment Screening
<p>Creation of a new Pedestrian Street and public realm park between Pound Street/Bank Place and the Supervalu Retail Complex and the restoration, refurbishment and alteration of an existing stone outbuilding adjoining same to a Creative Makers Hub including a communal workshop and retail space for creative and craft industries;</p>	<p>Potentially all sites within the zone of influence of the proposed development.</p>	<p>Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.</p>	<p>Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.</p>	<p>Unlikely</p>	<p>Unlikely</p>	<p>No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development would therefore not necessitate Stage 2 AA.</p>
<p>New demountable canopy feature(s) in the existing Diamond area civic space;</p>	<p>Potentially all sites within the zone of influence of the proposed development.</p>	<p>Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.</p>	<p>Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.</p>	<p>Unlikely</p>	<p>Unlikely</p>	<p>No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development</p>

Proposed development	Natura 2000 Sites That May Be Affected	Potential Impact of Proposed development	Risk of Significant Impact	Potential of In-Combination Impacts	Risk of Significant In-Combination Impacts'	Appropriate Assessment Screening
						would therefore not necessitate Stage 2 AA.
New public realm improvements on Back Lane connecting the Diamond to the Town Car Park and Bridge Street including new surface materials, lighting scheme, murals, demolition of existing car park boundary wall and construction of a new replacement car park boundary wall; and	Potentially all sites within the zone of influence of the proposed development.	Unlikely given the nature of the proposed development, its urban infill location and separation from a Natura 2000 site.	Unlikely given the nature of the proposed development, its urban infill location and separation from a Natura 2000 site.	Unlikely	Unlikely	No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development would therefore not necessitate Stage 2 AA.

Proposed development	Natura 2000 Sites That May Be Affected	Potential Impact of Proposed development	Risk of Significant Impact	Potential of In-Combination Impacts	Risk of Significant In-Combination Impacts'	Appropriate Assessment Screening
<p>All associated ancillary works to include site drainage, connection to public water supply and other services, landscaping, development related signage & public art, connection & discharge to the public sewerage network.</p>	<p>Potentially all sites within the zone of influence of the proposed development.</p>	<p>Unlikely given the nature of the proposed development, its urban infill location and separation from a Natura 2000 site.</p>	<p>Unlikely given the nature of the proposed development, its urban infill location and remove from a Natura 2000 site.</p>	<p>Unlikely</p>	<p>Unlikely</p>	<p>No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development would therefore not necessitate Stage 2 AA.</p>