Appropriate Assessment Screening Report

Appropriate Assessment Screening Report (AASR)
for Longford County Council for the construction of a proposed storm water management system to separate the existing combined sewer to facilitate the re-development of the former Officers Building, Abbeycarton, Longford, Co. Longford, a Protected Structure, situated within the grounds of Sean Connolly Barracks

Greentrack Environmental Consultants

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1 INTRODUCTION

1.1 Background and Requirement for Report

Greentrack Consultants have been instructed by Robin Lee Architecture, 71 Queensway, London, W2 4QH to undertake this Appropriate Assessment Screening Report (AAsr). The aim of this screening report is to assess whether significant effects on European Sites are likely to arise from the proposed development individually or in-combination with other plans/projects.

1.1.1 EU Habitats Directive

The Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna) formed a basis for the designation of Special Areas of Conservation (SAC's). Similarly, Special Protection Areas are legislated for under the Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds). Collectively, SACs and SPAs are referred to as Natura 2000 sites. In general terms, they are considered to be of exceptional importance in terms of rare, endangered or vulnerable habitats and species within the European Community. Under Article 6(3) of the Habitats Directive an Appropriate Assessment must be undertaken for any plan or project that is likely to have a significant effect on the conservation objectives of a Natura 2000 site. An Appropriate Assessment is an evaluation of the potential impacts of a plan or project on the conservation objectives of a Natura 2000 site, and the development, where necessary, of mitigation or avoidance measures to preclude negatives effects. The main aim of the EU Habitats Directive is to "contribute towards ensuring biodiversity through the conservation of natural habitats of wild fauna and flora in the European territory of the Member States to which the treaty applies". The Directive was originally transposed into Irish law by the European Communities (Natural Habitat) Regulations, S1 94/1997. However, two judgments of the Court of Justice of the EU (CJEU) – notably cases C-418/04 and C-183/05 - found that Ireland had not adequately transposed the two Directives. Part 6 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 is therefore relevant in dealing with the protection of flora and fauna since the revoke of the European habitats Regulations of 1997. This consolidates the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in CJEU judgments.

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*".

As such any project likely to have a significant effect, either individually or in combination with other plans or projects, upon the conservation objectives of a Natura 2000 site must undergo an assessment of its implications on relevant Natura 2000 sites. In order to establish whether or not a likely significant effect will arise as a result of the implementation of a project a Screening Assessment should be undertaken. It is therefore deemed necessary to screen the project for the potential to result in significant negative effects to the published conservation objectives of Natura 2000 sites. The applicant is therefore submitting this NIS to allow the consent authority, Donegal County Council, to carry out an Appropriate Assessment on the planning application as submitted.

1.1.2 Stages of the Habitat Directive Assessment

Screening for Appropriate Assessment must be carried out to assess, in view of best scientific knowledge and in view of the conservation objectives of the relevant European site(s), if the proposed operation/activity on its own or in combination with other plans or projects is likely to have a significant effect on the European site(s) (Regulation 42(1) of the 2011 Regulations). The likely effects of all aspects of the operation must be considered and screened in combination with other operations and other management activities which are completed, commenced, permitted, or proposed and other developments that could act in combination. It must be determined that an Appropriate Assessment is required if it cannot be excluded on the basis of objective scientific information, following screening, that the project, alone or in combination with other plans or projects will have a significant effect on the European site(s) (Regulation 42(6)). The precautionary principle should be applied in reaching this determination, i.e. where there is uncertainty or a lack of data, it should not be assumed that significant effects will not result.

The Appropriate Assessment process consists of four stages as summarised below in sequential order. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. Stages 1 and 2 deal with the main requirements for assessment under Article 6(3). Stage 3 may be part of Article 6(3) or may be a necessary precursor to Stage 4, which is the main derogation step to Article 6(4).

Figure 1.1: Stages of Screening (Relevant Stages Highlighted)

Appropriate Assessment Screening	**Natura Impact Statement**	**Alternative Solutions**	**Imperative Reasons of Overriding Public Interest**

Stage 1 – Appropriate Assessment Screening. Screening involves an initial assessment of the project or plan's effect on a Natura 2000 site(s). If it cannot be concluded that there will be no significant effect upon a Natura 2000 site, an Appropriate Assessment is required. The process 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). Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact. This report provides the information necessary to enable the appropriate authority to screen the proposed development for the requirement to prepare an Appropriate Assessment.

Stage 2 - Appropriate Assessment (Natura Impact Statement or NIS): The consideration of the impact on the integrity of the Natura 2000 site(s) from the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its

conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.

Stage 3 – Assessment of alternative solutions: The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the 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.

Stage 4 – Assessment where no alternative solutions exist and where adverse impacts remain: 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. 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. Each listed stage determines whether a further stage in the process is necessary. If, for example, the conclusions at the end of Stage One are that there will be no significant impacts on the Natura 2000 site(s), there is no requirement to proceed further.

Following on from Article 6(3) of the Habitats Directive the objective of this Natura Impact Statement is to screen for "Likely Significant Effects" and to conclude whether or not the proposed activity is likely to result in significant adverse effects to the integrity of any Natura 2000 sites within the zone of influence. The appraisal of adverse effects to the integrity of these sites will be established by assessing the potential impacts the proposal will have on the conservation objectives of said Natura 2000 sites. This report will also detail measures that will avoid, reduce, and mitigate any such adverse effects.

1.2 Guidance Documents

This AAsr was carried out in accordance with relevant National and European Guidance including but not limited to:

National Guidance:

- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (Department of Environment, Heritage and Local Government 2010)
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10 (NPWS, 2010)
- Appropriate Assessment Screening for Development Management: OPR Practice Note PN01 (OPR, 2021)

European Guidance:

- Communication from the Commission on the precautionary principle (European Commission, 2000).
- European Commission, Nature and biodiversity cases – Ruling of the European Court of Justice, Publications Office, 2006,

- Article 6 of the Habitats Directive – Rulings of the European Court of Justice (European Commission Final Draft September 2014)

- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (European Commission, 2019).

- Assessment of plans and projects in relation to Natura 2000 Sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC Brussels, 28.9.2021 C (European Commission, 2021)

1.3 Statement of Authority

This AAsr has been compiled by Shannen McEwen, Ecologist with Greentrack. Shannen holds a BSc. (Hons) Environmental Science with a Diploma in Professional Practice from the University of Ulster. She has been involved in all aspects of Appropriate Assessment, Natura Impact Statement and Environmental Impact Assessment preparation since 2017. Shannen is an Associate Member of the Institution of Environmental Sciences.

2 APPROACH AND METHODOLOGY

2.1 Approach

The function of this AAsr is to identify whether the proposal will have a likely significant effect on the Natura 2000 sites as detailed. The nature of the likely interactions between the proposal and the integrity of the site will depend upon:

- sensitivity of the site's qualifying interests to potential impacts arising from the proposal
- current conservation status of the sites and
- the likely changes that will result from activities associated with the proposal, in combination with other plans and projects.

The general approach applied in appropriate assessment is as follows:

Stage 1 Screening:

- Define the project and determine whether it is necessary for the conservation management of Natura 2000 sites.

- Establish a Zone of Influence (ZOI) and identify Natura 2000 sites likely to be influenced by this development.

- Review the project to determine if it has the potential to affect the Natura 2000 sites and determine whether the Natura 2000 sites are vulnerable to the effect.

- Identify other plans or project that, in combination with this project, have the potential to affect Natura 2000 sites.

- If potential significant effects on Natura 2000 sites cannot be excluded at this stage, Stage 2 appropriate assessment is required.

- If potential significant effects on Natura 2000 sites can be excluded at this stage, Stage 2 appropriate assessment is not required.

Stage 2 Natura Impact Statement:

- Review the project to determine if it has the potential to affect the Natura 2000 sites identified in AA screening.
- Identify other plans or project that, in combination with this project, have the potential to affect Natura 2000 sites.
- Where adverse impacts are identified mitigation/compensatory measures will be proposed to offset/reduce/avoid the magnitude of the impact.
- Residual Impacts on the identified Natura 2000 sites will be assessed.

2.2 Methodology

The methodology used for this AAsr is as follows:

- The plan/project and the receiving environment were reviewed and described.
- A ZOI of the plan/project was defined based on the characteristics of the proposed plan/project and the receiving environment. This refers to the area over which the proposed plan/project can exert effect on designated sites. Sites were identified by using a source-pathway receptor approach. Here the European Site represents the receptor, with the source being an aspect of the proposed plan/project such as emissions, water discharge etc. and the pathway is a vector for transporting the source to the receptor such as air or a watercourse. A number of additional factors must be considered when defining the ZOI [1], including:
    - Any Natura 2000 sites within/adjacent the plan/project area
    - The distance over which effects can be received: A distance of 15km is commonly used and derives from UK guidance [2]. This must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects. Natura 2000 sites that are more than 15km from the plan or project area may be at risk of impact depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the case of sites with water dependent habitats or species, and a plan or project that could affect water quality or quantity, for example, it may be necessary to consider the full extent of the upstream and/or downstream catchment. In the case of certain plans/projects relating to SPA's, the ZOI may be influenced by the core range of SCI's. Scottish Natural Heritage provides guidance on the core range of several SCI's and assessing the zone of influence [3]. Additional scientific literature can be used to established ranges of species that European Sites support.
- Sites within the ZOI and connected to the proposed plan/project area by a source – pathway – receptor chain were assessed within the context of the proposal to ascertain whether there is a likelihood of significant adverse effects in the absence of mitigation

[1] Appropriate Assessment Screening for Development Management: OPR Practice Note PN01 (OPR, 2021)
[2] Treweek Environmental Consultants, Appropriate Assessment of plans, 2006
[3] Scottish Natural Heritage Assessing Connectivity with Special Protection Areas (SPAs) Guidance, 2016

measures. Where any uncertainty exists, the precautionary principle was followed, and it is assumed that uncertainty implies that adverse effects cannot be excluded.

- Cumulative impact assessment was conducted to assess the impact of the proposed plan/project in combination with other plans/projects.

- Considering all characteristics of the plan/project, the receiving environment, and potential in- combination a final screening determination was made to determine whether potential adverse effects on European sites could be excluded.

- Where there was no likelihood of adverse effects the Natura 2000 site was excluded from assessment, where there was a finding of potential adverse effects in the absence of mitigation the Natura 2000 site was screened in for stage 2 appropriate assessment.

The methodology employed desk study and field survey work. These stages are not sequential and occur in tandem as the assessment requires.

2.2.1 Desk Study

A desk-based analysis was conducted to obtain information on Natura 2000 sites and establish the zone of influence of the proposed development and to identify potential source-pathway-receptor chains to the European Sites from the area proposed for development. Furthermore, available records of plans / projects were accessed to obtain information on potential cumulative impacts. The following data sources were used during desk-based analysis:

- Latest boundary data for Natura 2000 sites. (Last updated 2024 for both SAC & SPA datasets) Available from www.npws.ie/maps-and-data/designated-site-data/download-boundary-data
- Article 17 Data. Available from www.npws.ie/maps-and-data
- NPWS Site Synopsis and Conservation Objectives, available at www.npws.ie
- Hydrological data form the EPA available from www.gis.epa.ie/GetData/Download.
- The EIA portal at www.Housinggovie.maps.arcgis.com,
- Donegal County Council Planning Portal, available at www.donegal.maps.arcgis.com/apps/webappviewer, and www.eplanning.ie/DonegalCC/SearchTypes

QGIS 3.34 was used to facilitate the analysis of spatial data from online sources and gathered during baseline surveys. Furthermore, this data was used to generate several figures contained within this report.

2.2.2 Remote Assessments

Photographs of the site were supplied to Greentrack and Google Street Maps Images were viewed. A remote habitat assessment was conducted using guidelines produced by the JNCC[4] in conjunction with Fossitt's Guide to Habitats in Ireland[5].

[4] JNCC. (2010) Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit. Joint Nature Conservation Committee, Peterborough.
[5] J. Fossitt. (2000) A Guide to Habitats in Ireland. The Heritage Council, Dublin

3 THE PROJECT

The project is not necessary for the conservation of any Natura 2000 site.

The proposal is for the construction of a new storm drainage network to facilitate the refurbishment and adaption of the existing former Officers Building at Connolly Barracks, Longford. The existing building occupies an area of 836 m^2 and amongst the proposals is a 505 m^2 extension to the rear of the building.

The wording of the planning application is:

> *"Proposed storm water management system to separate the existing combined sewer to facilitate the re-development of the former Officers Building, Abbeycarton, Longford, Co. Longford, a Protected Structure, situated within the grounds of Sean Connolly Barracks."*

The various elements of the development are:

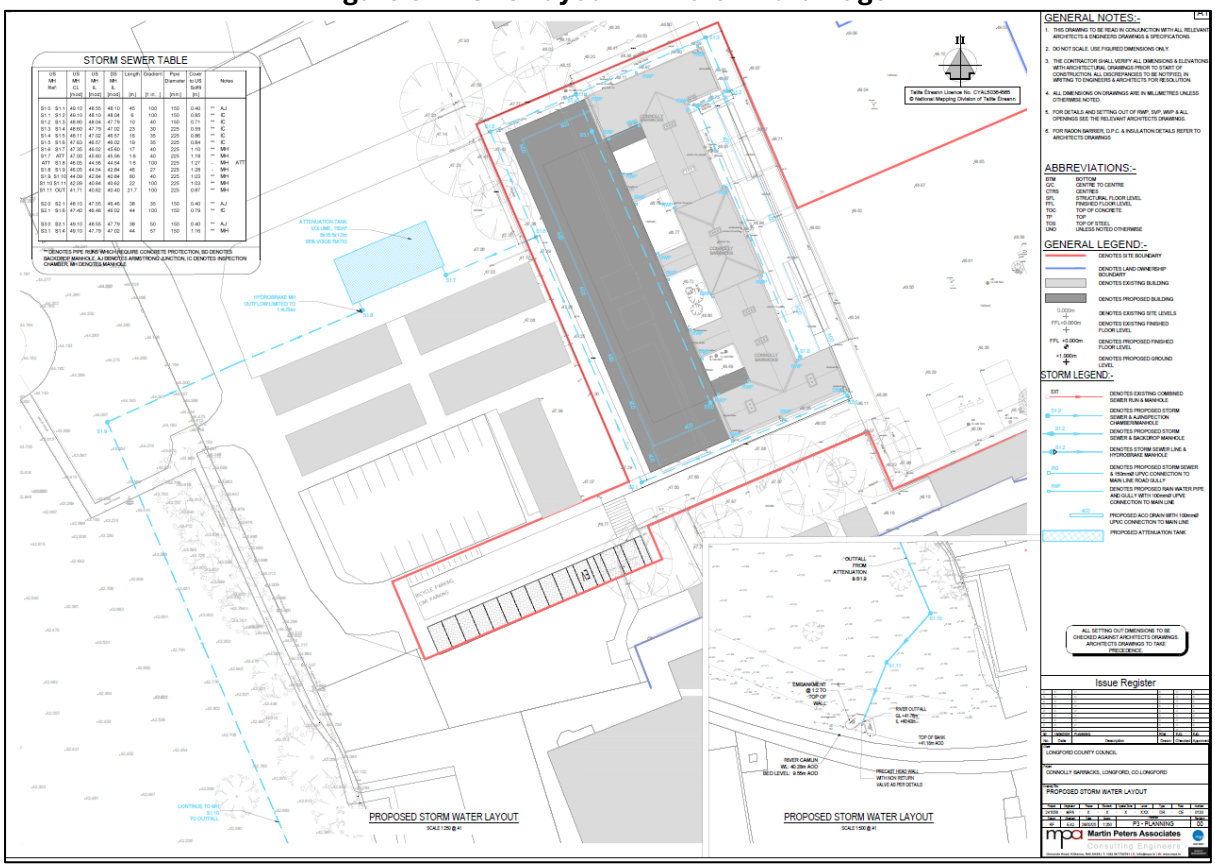
- The provision of a separate stormwater drainage system to discharge stormwater generated from roof and local hardstanding areas of the existing Officers Building and proposed extension only. System to include a gravity stormwater sewer to the perimeter of the building, which is to discharge to an onsite stormwater storage system, which will in-turn discharge stormwater to the Camlin River via a flow control device.
- Refurbishment with internal alterations, external alterations, repairs and upgrades to the Protected Structure (former Officers Building).
- New single storey extension to the rear (west) of the Officers Building.
- Demolition of rear boundary wall and utilitarian buildings to the west of the Officers Building.
- Public realm enhancements comprised of permeable hard landscaping to facilitate universal access.
- Installation of feature lighting to former Officers Building.
- Provision of 8no. secure car parking spaces to service the multi-purpose community-focussed hub including 2no. accessible parking space, provision of EV charging point and short stay secure bicycle parking.

This project can typically be divided into stages, including:

- Construction Stage
- Operational Stage

Figure 3.1 shows the proposed storm drainage layout

Figure 3.1: Site Layout with storm drainage



(Extract from drawing produced by Robin Lee Architecture – not to scale)

3.1 Construction Stage

Construction works will comprise the following:

(1) Construction and installation of new storm drainage network
(2) Demolition of rear boundary wall and utilitarian buildings
(3) Excavation and laying of foundations for framing
(4) Provision of service ducting/trenches
(5) Steel or timber framing erected
(6) Roofing of extension and external cladding
(7) Internal fitout and refurbishment work
(8) Connection to existing services
(9) External public realm enhancements including car parking
(10) Landscaping and all associated site development works

3.2 Operational Stage

The operational stage involves the repurposed use of the development as a multi-purpose community facility

- ***Surface Water Drainage***
  A revised storm drainage network has been designed by MPA Consulting Engineers. With the refurbishment works, it is proposed to provide gravity sewers on site with outflow controlled via a hydrobrake prior to discharge to the Camlin River. All excess volume is to be stored within an attenuation tank located within the curtilage of the site and in turn discharging to the existing watercourse to the West of the site. The maximum level of outfall from the new storm water management system will be restricted to replicate the

existing green field runoff from the site. The new storm/surface drainage network has been sized to provide sufficient storage and attenuation for a 1 in 100-year rainfall event.

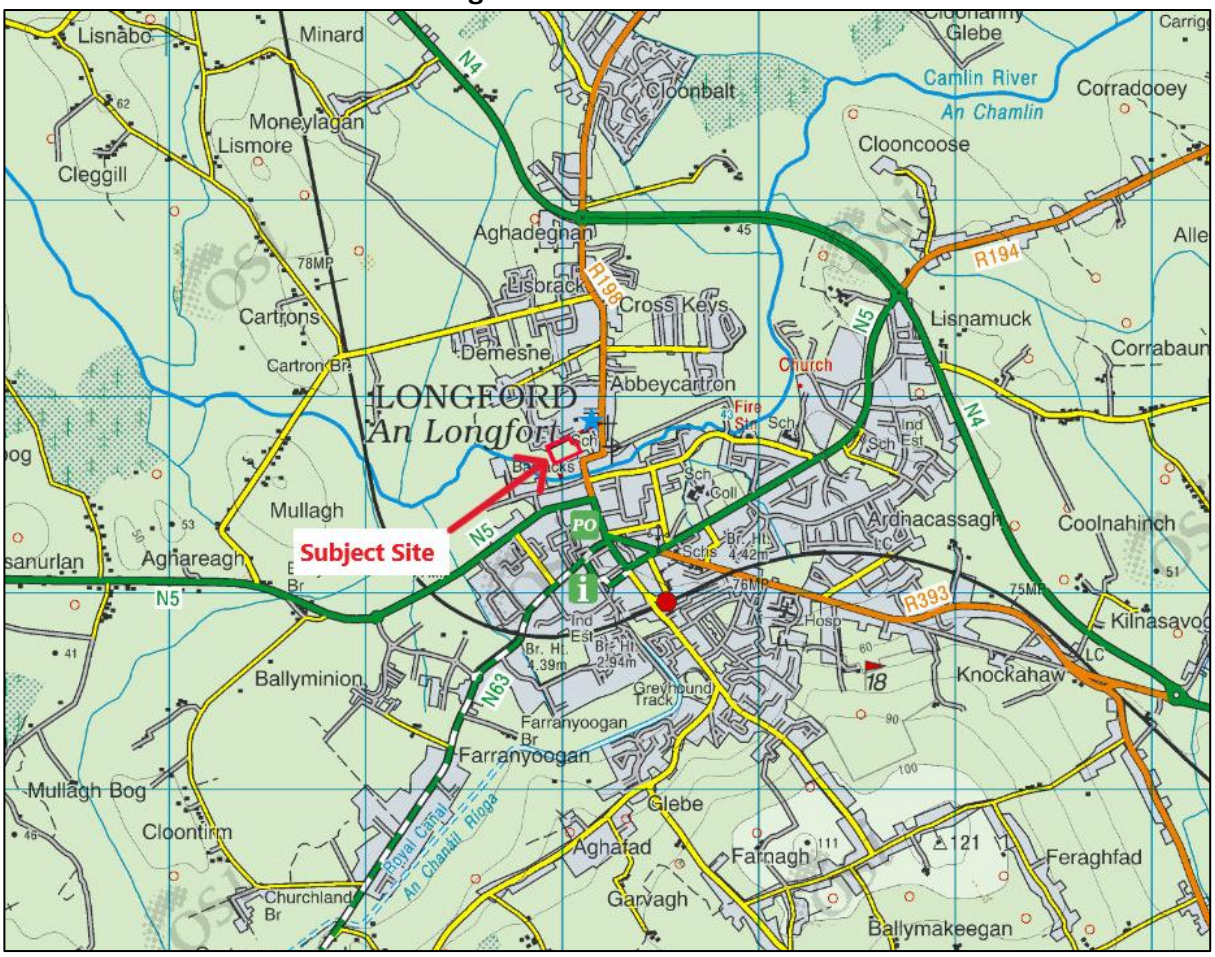
- ***Foul Water Management***
  The foul drainage for the proposal will connect in with the existing public foul drainage network.

4 THE RECEIVING ENVIRONMENT

4.1 General Location

The subject site is located in the centre of Longford town, just north of the Camlin River. Access to the site is directly off the regional R198. The Camlin River flows west and is located approximately 70 m south of the site. The subject site is bounded by commercial, retail and private residences to the south, east and north, and by an area of parkland and the Camlin River to the west. Figure 4.1 below shows the site location.

Figure 4.1: Site Location



CYAL50447692 © Ordnance Survey Ireland/Government of Ireland

4.2 Site Description

The site is irregular in shape and is a former Army barracks. The site contains many different buildings and several car parks and areas of amenity grassland. There are also some tree-lined boundaries and wooded areas in the western part of the site. The site is mostly a brownfield site with hard surfacing of tarmac surrounding the buildings with access roads and pathways throughout.

4.3 Hydrology

River Basin Management Plans (RBMPs) exist for each River Basin Districts in Ireland in accordance with the Water Framework Directive. The EPA map viewer provides access to water quality information at individual waterbody status for all the River Basin Districts in Ireland. The EPA map viewer was searched on 13/12/2024 for information on the water quality surrounding the subject site.

The site lies within the 26C Upper Shannon Water Framework Directive (WFD) catchment, the Shannon (Upper) WFD sub catchment and the Camlin River sub basin (EPA code: IE_SH_26C010900). The site is relatively flat throughout. A new storm drainage network has been designed by MPA Consulting Engineers which will comprise gravity sewers on site with outflow controlled via a hydrobrake prior to discharge to the Camlin River approximately 70 m south of the site. There are no watercourses on site. Rainwater incident on the site outside of the stormwater capture system will infiltrate to ground and flow by throughflow and shallow groundwater flow to the River Camlin.

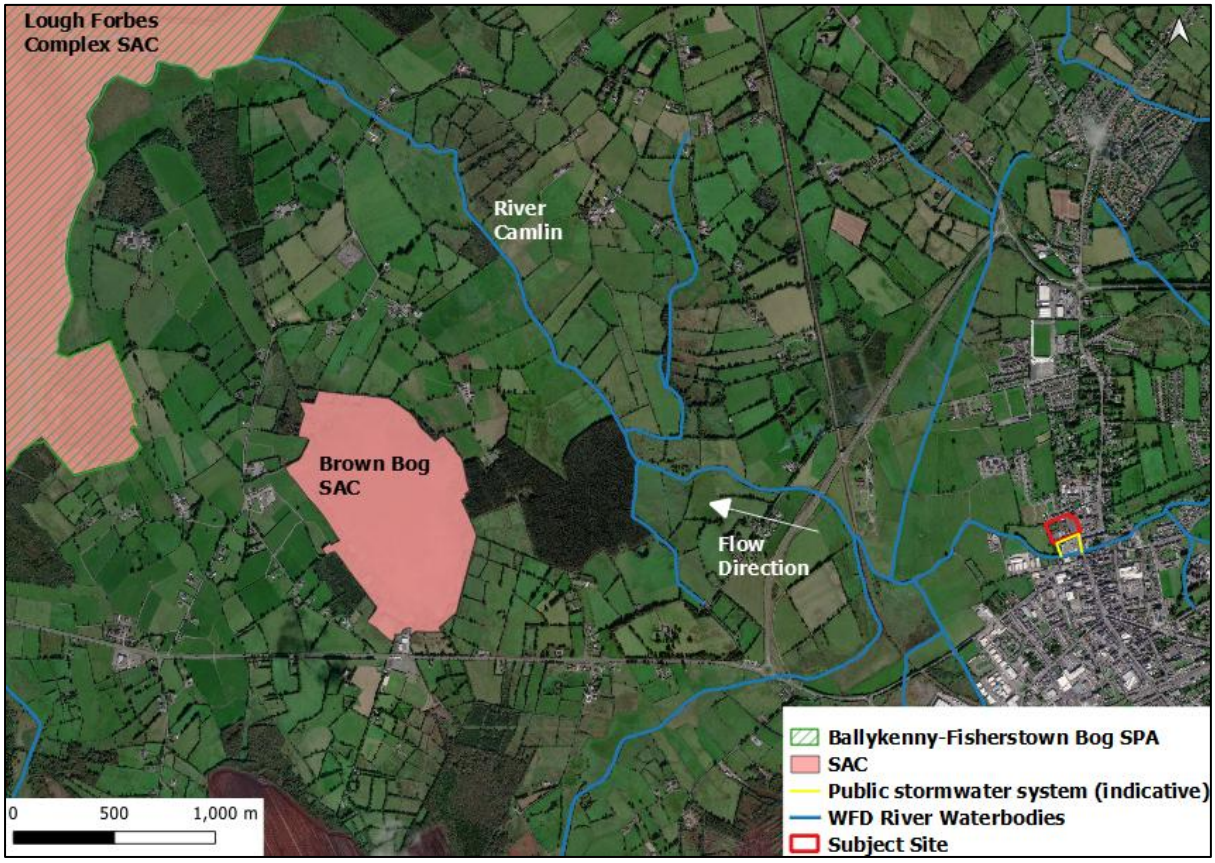
The River Camlin flows west and empties into the River Shannon immediately south of Lough Forbes. The Lough Forbes Complex SAC designation includes the River Camlin from a point approximately 1.7 km from its confluence with the Shannon. The approximate hydrological distance from the site to the Lough Forbes Complex SAC is 5.68 km.

The nearest SPA to the site is the Ballykenny-Fisherstown Bog SPA which lies c. 4.54 km to the northwest at its closest point. The hydrological link to the SPA is through surface water drainage from the site discharging into the River Camlin. The approximate hydrological distance from the site to the Ballykenny-Fisherstown Bog SPA is 5.68 km.

The WFD status of the River Camlin as a river waterbody is assessed as ‘moderate’ by the EPA for the period 2016 - 2021. The river status drops to ‘poor’ less than 2 km downstream of the site.
The WFD status of the underlying groundwater body (Longford Ballinalee) is assessed by the EPA as ‘good’ for the period 2016 – 2021. The River Camlin is not designated as a Salmonid water under SI No 293 of 1988 – EC (Quality of Salmonid waters) Regulations, 1988. The River Camlin does not contain the Annex 1 species, the freshwater pearl mussel (*Margaritifera margaritifera*). The site does not form part of any Margaritifera catchment area.

The hydrological connections from the site to the Lough Forbes complex SAC and Ballykenny-Fisherstown Bog SPA is illustrated in Figure 4.2 below.

Figure 4.2: Hydrological Connections to SAC & SPA



(Created using QGIS, Bing satellite imagery and datasets from the NPWS)

4.4 Baseline Surveys

4.4.1 Habitats

Photographs of the site were supplied to Greentrack and Google Street Maps Images were viewed. A remote habitat assessment was conducted using guidelines produced by the JNCC[6] in conjunction with Fossitt's Guide to Habitats in Ireland[7].

The site is a mosaic of several habitats. The majority of the site is classified as Buildings and artificial surfaces (BL3), with areas of amenity grassland (GA2) and treelines (WL2) mainly along the boundaries of the site with improved agricultural grassland (GA1) to the west of the existing development. The external development proposals of the rear extension and minor re-grading and landscaping are only concerned with areas of the site that are categorised as Buildings and artificial surfaces (BL3) and amenity grassland (GA2). Figure 4.3 below show the habitats present on site.

[6] JNCC. (2010) Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit. Joint Nature Conservation Committee, Peterborough.
[7] J. Fossitt. (2000) A Guide to Habitats in Ireland. The Heritage Council, Dublin

Figure 4.3: Habitats on site

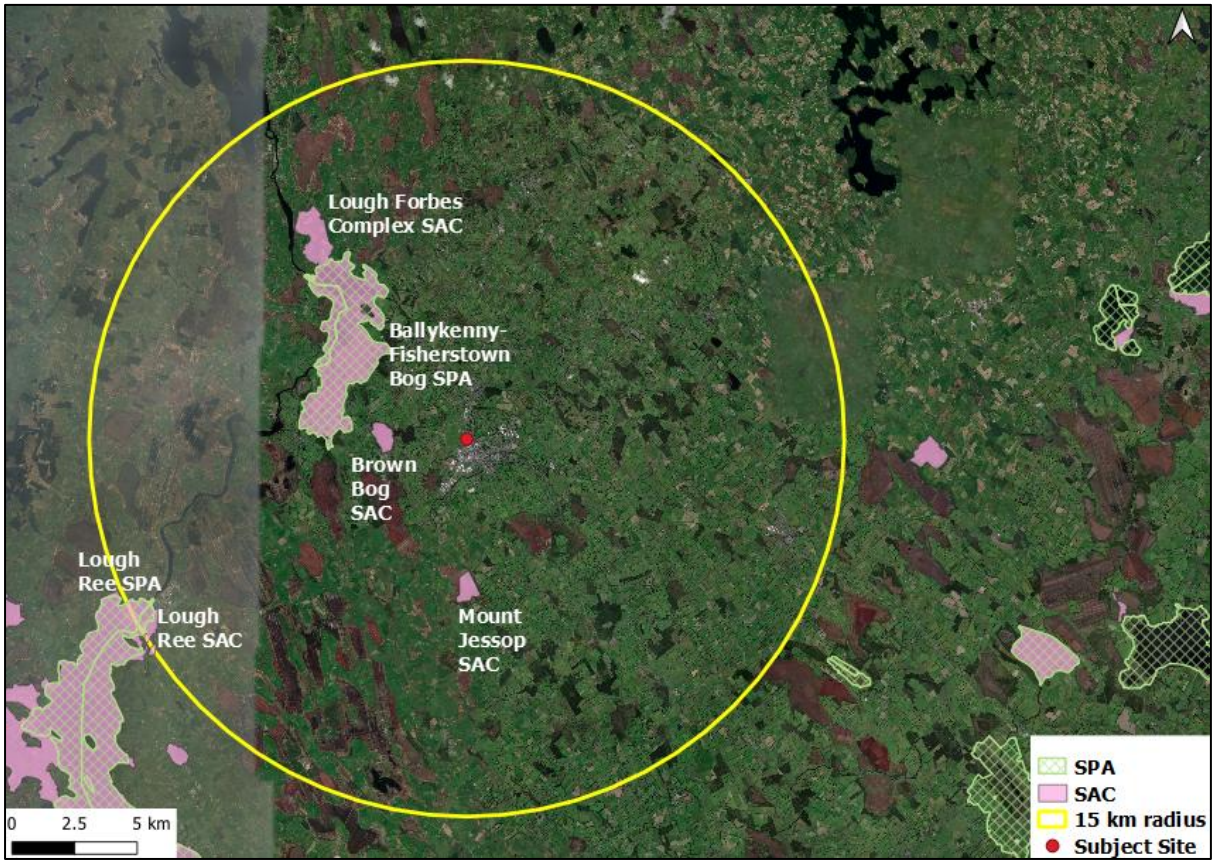
(Created using QGIS and Bing satellite imagery)

5 NATURA 2000 SITES

5.1 Appropriate Assessment Screening

Figure 5.1 indicates the relative locations of Natura 2000 sites in relation to the subject site.

Figure 5.1: Proximal Natura 2000 sites



(Created using QGIS, Bing satellite imagery and NPWS datasets)

Considering the criteria outlined in Section 2, the following European Sites were assessed to ascertained whether:

i. there is a source – pathway -receptor chain to the designated site, and they are within the likely zone of influence of the proposed plan/project,

ii. there is potential for significant adverse effects in the absence of mitigation arising from the proposed plan/project and that further screening is required.

Relevant Natura 2000 sites occurring within the receiving environment of the proposed project are assessed in screening Table 5.1.

Table 5.1: Screening of Natura 2000 Sites and Zone of Influence of Project

Site Name / Code/ Distance	QIs /SCIs	Source-Pathway-Receptor (SPR) Chain	Considered in Further Screening (Y/N)
Special Areas of Conservation			
Lough Forbes Complex SAC 001818 c. 4.5 km west	• Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition* - type vegetation [3150] • Active raised bogs [7110] • Degraded raised bogs still capable of natural regeneration [7120] • Depressions on peat substrates of the *Rhynchosporion* [7150]	Potential hydrological link to the SAC through surface water drainage from the site directed to the Camlin River, and potential throughflow and shallow groundwater flow from the site to	**Y**

Site Name / Code/ Distance	QIs /SCIs	Source-Pathway-Receptor (SPR) Chain	Considered in Further Screening (Y/N)
	• Alluvial forests with Alnus glutinosa and Fraxinus excelsior (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0]	the Camlin River. The approximate hydrological distance from the site to the SAC is 5.68 km.	
Brown Bog SAC 002346 c. 2.8 km west	• Active raised bogs [7110] • Degraded raised bogs still capable of natural regeneration [7120] • Depressions on peat substrates of the Rhynchosporion [7150]	No SPR Chain	N
Lough Ree SAC 000440 c. 13.92 km southwest	• Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150] • Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] • Active raised bogs [7110] • Degraded raised bogs still capable of natural regeneration [7120] • Alkaline fens [7230] • Limestone pavements [8240] • Bog woodland [91D0] • Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] • Lutra lutra (Otter) [1355]	No SPR Chain	N
Mount Jessop SAC 002202 c. 5.17 km south	• Degraded raised bogs still capable of natural regeneration [7120] • Bog woodland [91D0]	No SPR Chain	N
Special Protection Areas			
Ballykenny-Fisherstown Bog SPA 004101 c. 4.5 km west	• Greenland White-fronted Goose (*Anser albifrons flavirostris*) [A395]	Outside known core ranges of SCI's Potential hydrological link to the SPA through surface water drainage from the site directed to the Camlin River, and potential throughflow and shallow groundwater flow from the site to the Camlin River. The	**Y**

Site Name / Code/ Distance	QIs /SCIs	Source-Pathway-Receptor (SPR) Chain	Considered in Further Screening (Y/N)
		approximate hydrological distance from the site to the SPA is 5.68 km.	
Lough Ree SPA 004064 c. 13.97 km southwest	• Little Grebe (Tachybaptus ruficollis) [A004] • Whooper Swan (Cygnus cygnus) [A038] • Wigeon (Anas penelope) [A050] • Teal (Anas crecca) [A052] • Mallard (Anas platyrhynchos) [A053] • Shoveler (Anas clypeata) [A056] • Tufted Duck (Aythya fuligula) [A061] • Common Scoter (Melanitta nigra) [A065] • Goldeneye (Bucephala clangula) [A067] • Coot (Fulica atra) [A125] • Golden Plover (Pluvialis apricaria) [A140] • Lapwing (Vanellus vanellus) [A142] • Common Tern (Sterna hirundo) [A193] • Wetland and Waterbirds [A999]	Outside known core ranges of SCI's No SPR chain	N

Table 5.1 has identified potential source-pathway-receptor links to the following Natura 2000 sites:

- ***Lough Forbes Complex SAC***
- ***Ballykenny-Fisherstown Bog SPA***

Considering the identified source pathway receptor chains to European Sites, the proposal will now be considered with regard to the likelihood of generating adverse impacts in the absence of mitigation on these European Sites. Table 5.2 details a screening determination matrix of identified European Sites. These sites are examined in the context of the proposal and a screening determination is provided.

5.2 Review of Potential Impacts

5.2.1 Habitat Loss

The proposed development is not located within, or adjacent to, any SAC or SPA. No habitat loss can occur inside any Natura 2000 site.

5.2.2 Ex situ habitat impacts

The development site does not provide suitable habitat for an QIs of the SAC or SCIs of the SPA. Loss or disturbance of ex-situ habitat is not predicted.

5.2.3 Hydrological Impacts – wastewater

The subject site has an existing connection to the public foul water sewer which will ensure efficient operation of foul water management. The latest available Annual Environmental Report from Irish Water for the wastewater treatment plant in Longford (2020) showed some non-compliance issues which were targeted to be resolved. The Uisce Éireann register of capacity in County Longford (published December 2024) shows there to be spare capacity available within Longford WWTP. No negative effects on the Natura 2000 sites are predicted to arise from the operation of foul water drainage infrastructure.

5.2.4 Hydrological Impacts – surface water during construction

Construction works will be temporary, and ground preparation/site clearance works will be minimal due to the existing hard surfaces and nature of the construction methods to be utilised. Contractors to Longford County Council will be contractually obliged to operate under best practice which includes adherence to the IFI's 'Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters' (2016). Due to the nature and methodology of construction and significant hydrological distance to the SAC/SPA and associated dilution factors it is not predicted construction works will give rise to hydrological impacts that could affect the Natura 2000 sites.

5.2.5 Hydrological Impacts – surface water during operation

A revised storm drainage network has been designed by MPA Consulting Engineers. With the refurbishment works, it is proposed to provide gravity sewers on site with outflow controlled via a hydrobrake prior to discharge to the Camlin River. All excess volume is to be stored within an attenuation tank located within the curtilage of the site and in turn discharging to the existing watercourse to the West of the site. The maximum level of outfall from the new storm water management system will be restricted to replicate the existing green field runoff from the site. The new storm/surface drainage network has been sized to provide sufficient storage and attenuation for a 1 in 100-year rainfall event. SUDs drainage features are designed into the development as part of best practice and not as a means to reduce potential impact on Natura 2000 sites. Permeable hard landscaping is proposed. Only clean water from roof areas and hard surfaces is serviced by the stormwater system. No significant effects on water resource quality in the Natura 2000 sites are predicted to occur due to surface water run-off during the operation of the proposed development.

5.2.6 Noise/Dust

The Ballykenny – Fisherstown Bog SPA is c. 4.5 km west from the proposed development at its closest point. It is not predicted noise or dust emissions from the construction or operation of the proposed developed will impact the SPA due to the separation distance from the subject site and the nature of the intervening lands.

Table 5.2: Stage 1 Screening Determination

Natura 2000 Site	Qualifying Interests for which the site was selected	Conservation Objectives	Stage 1 Screening Determination (Can Significant Effects be excluded in the absence of mitigation?)
Special Areas of Conservation			
Lough Forbes Complex SAC (Site Code: 001818)	• Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150] • Active raised bogs [7110] • Degraded raised bogs still capable of natural regeneration [7120] • Depressions on peat substrates of the Rhynchosporion [7150] • Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	To maintain or restore the favourable conservation condition of the qualifying interests of the SAC [8]	Potential effects on the SAC could arise from construction/operation stage water discharge entering the hydrological pathway to the SAC. For the construction stage, lack of responsible water management could cause pollutants (silt/cement etc) to become suspended in waters which follow identified pathways to the SAC. Construction works will be temporary, and ground preparation/site clearance works will be minimal due to the existing hard surfaces and nature of the construction methods to be utilised. Best practice[9] will be implemented during construction at all times. Due to the nature and methodology of construction and best practice employed, it is not predicted construction works will give rise to hydrological impacts that could affect the Natura 2000 sites. In the operational phase, SuDs strategies are to be implemented within the stormwater network and in the development design (permeable hard landscaping). Foul water will continue to be connected into the existing public foul sewer which will ensure no negative effects arise from improper foul water management. Operational surface water is not likely to give rise to significant negative effects on the SAC. Due to the existing hard surfaces, urban location, low impact construction methodology and short-term temporary nature of construction, it is not considered that the predicted noise or dust emissions from the construction or operation of the proposed developed will impact any QIs of the SAC.

[8] NPWS (2016) Conservation Objectives: Lough Forbes Complex SAC 001818. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
[9] Adherence to IFI's 'Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters' (2016).

Natura 2000 Site	Qualifying Interests for which the site was selected	Conservation Objectives	Stage 1 Screening Determination (Can Significant Effects be excluded in the absence of mitigation?)
			Considering the nature and scale of the proposed development and the nature and scale of the pathway for effect to the European site, there is no likelihood that there will be any significant effect on the conservation interests of the SAC at any stage of development.
Special Protection Areas			
Ballykenny-Fisherstown Bog SPA (Site Code: 004101)	• Greenland White-fronted Goose (Anser albifrons flavirostris) [A395]	To maintain or restore the favourable conservation condition of the Species of Conservation Interest of the SPA[10]	Potential effects on the SPA could arise from construction/operation stage water discharge entering the hydrological pathway to the SPA. For the construction stage, lack of responsible water management could cause pollutants (silt/cement etc) to become suspended in waters which follow identified pathways to the SPA. Construction works will be temporary, and ground preparation/site clearance works will be minimal due to the existing hard surfaces and nature of the construction methods to be utilised. Best practice[11] will be implemented during construction at all times. Due to the nature and methodology of construction and best practice employed, it is not predicted construction works will give rise to hydrological impacts that could affect the Natura 2000 sites. In the operational phase, SuDs strategies are to be implemented within the stormwater network and in the development design (permeable hard landscaping). Foul water will continue to be connected into the existing public foul sewer which will ensure no negative effects arise from improper foul water management. Operational surface water is not likely to give rise to significant negative effects on the SPA. The SPA is c. 4.5 km west from the proposed development at its closest point. It is not predicted noise or dust emissions from the construction

[10] NPWS (2022) Conservation objectives for Ballykenny-Fisherstown Bog SPA [004101]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.
[11] Adherence to IFI's 'Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters' (2016).

Natura 2000 Site	Qualifying Interests for which the site was selected	Conservation Objectives	Stage 1 Screening Determination (Can Significant Effects be excluded in the absence of mitigation?)
			or operation of the proposed developed will impact the SPA due to the urban location, low impact construction methodology, short-term temporary nature of construction and separation distance from the subject site. Considering the nature and scale of the proposed development and the nature and scale of the pathway for effect to the European site, there is no likelihood that there will be any significant effect on the conservation interests of the SPA at any stage of development.

5.2 Cumulative Impact Assessment

5.2.1 Review of Projects

To assess cumulative impacts with other plans or projects for the proposed development, a search for projects that have been already completed, approved but uncompleted, or proposed (i.e., for which an application for approval or consent has been submitted) has been conducted. A time period of 5 years was chosen. Projects in the immediate vicinity of the proposed development were considered.

The EIA Portal was searched for any projects/plans that could combine with the proposed development and cumulatively affect Natura 2000 sites. No plans/projects were identified within the vicinity of the proposed development or its pathway of connectivity to Natura 2000 sites.

Local authority planning databases were examined to cumulatively assess any impact on European Sites in combination with the proposal.

Table 5.3 contains cumulative impact assessment of relevant Plans/projects found through searches of the EIA portal / Local Authority Databases.

Table 5.3: Cumulative impact with other projects

Planning Reference	Description	Status	Assessment	Potential for Cumulative Effects
2360202 adjacent	Permission for: 1. Change of use of the former gymnasium building to educational use, including alterations to existing elevations. 2. Change of use of the former ration store building to a canteen and welfare facility including alterations to existing elevations, along with a proposed extension to the west elevation to facilitate a new entrance lobby and welfare toilets. 3. A new glazed link extension to the south elevation of the proposed canteen and welfare facility. Together with all associated ancillary site works	Granted April 2024	The planning authority screened the development as to the requirement for Appropriate Assessment and it has been determined that that AA is not required due to the nature of the proposed development and the separation distances from the nearest Natura 2000 sites.	N
2260294 c.200 m north	Permission to carry out minor renovation works to an existing two-storey dwelling, to remove later single and two-storey additions and construct a two-storey extension (81.5sq.m) to rear (north west) corner of same, to modify the driveway and form a new vehicular entrance, to carry out refurbishment works to the existing gatelodge, to connect to existing services and to carry out necessary site works The proposed works relate to protected structures (House RPS No. 29, Gatelodge RPS No. 24)	Granted November 2022	The planning authority screened the development as to the requirement for Appropriate Assessment.	N
21190 c. 400 m southwest	Permission for a licensed petrol filling station development consisting of 1 no. single storey ancillary retail and	Granted August 2021	An AA Screening Report was submitted by Downey	

Planning Reference	Description	Status	Assessment	Potential for Cumulative Effects
	commercial unit (443 sq.m. GFA comprising of a retail area, off-licence, coffee shop, cafe and deli area and ancillary staff and store rooms); a forecourt and canopy with fuel dispensing pumps; car wash area; underground fuel storage; signage (on the proposed building and totem pole style); bin storage; 27 no. car parking spaces, 3 no. HGV parking spaces and 6 no. bicycle parking spaces, lighting and all associated landscaping, boundary treatment, engineering and site development works necessary to facilitate the development including the demolition of all existing buildings and structures on the site and the provision of a new vehicular entrance/exit onto Connaught Road		Planning in support of the original planning application. The Screening Report concluded that the proposal would have no direct or measurable indirect impacts on the natura 2000 network and that Stage 2 Appropriate Assessment was not required.	
2360083 c. 350 m southwest	Proposed demolition of existing onsite derelict structures together with the proposed construction of a residential development of 42 no. dwelling houses consisting of 14 no. three bedroom two storey semi-detached type dwelling houses, 8 no. three bedroom two storey terraced type dwelling houses in two blocks of four units, 20 no. two bedroom two storey terraced type dwelling houses in five blocks of four units, proposed entrance from the proposed link road previously granted full planning permission under planning reference number PL17/148 & subsequent extension of duration of planning permission planning reference number PL21/192, internal access road, green open space, boundary fences/walls, proposed connections into the existing foul sewer, surface water & watermain networks of Longford Town and all ancillary works	Granted February 2024	A Natura Impact Statement was submitted with the application by Enviroplan Consulting Ltd. The NIS concluded that with the implementation of best practice and mitigation measures it is not expected that the proposed development would give rise to any direct or indirect impacts on the Natura 2000 network.	

5.2.2 Review of Plans

The Longford County Development Plan (CDP) 2021 - 2027 was reviewed to assess potential cumulative effects in combination with the proposed development. The Longford CDP has undergone strategic Appropriate Assessment and strategic Environmental Assessment. This proposal is aligned and compatible with the County Development Plan.

The Draft Longford Town Local Area Plan 2025 - 2031 (published September 2024) was also examined. This proposal is aligned and is compatible with the Draft Longford Town Local Area Plan 2025 – 2031.

5.2.3 Cumulative Impact Conclusion

The cumulative impact assessment found that project considered in combination with other plans/projects will not culminate in effect on European Sites.

5.3 Screening Statement

Considering the location, nature and extent of the proposal, source pathway receptor chains and the likely zone of influence for adverse effect, and in the absence of mitigation, significant effects can be excluded on identified European Sites. Therefore, Stage 2 Appropriate Assessment is not required.

6 CONCLUSION

The proposed project as detailed, either individually or in combination with other plans or projects, will have no significant adverse effects on the integrity of any European sites. The proposed development as described will not alter the structure or function of any Natura 2000 site or negatively impact the conservation of any qualifying interest/ special conservation interest therein.

This Appropriate Assessment Screening Report has been prepared by Greentrack Consultants with all reasonable care, due diligence, and professional application. Greentrack have also sought to implement the best current scientific knowledge on the potential effects this proposal will have on the Natura 2000 network.

REFERENCES:

1. Appropriate Assessment Screening for Development Management: OPR Practice Note PN01 (OPR, 2021)
2. Treweek Environmental Consultants, Appropriate Assessment of plans, 2006
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4. J. Fossitt. (2000) A Guide to Habitats in Ireland. The Heritage Council, Dublin
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6. Smith, G. F., O'Donoghue, P., O'Hara, K., Delaney, E (2011) Best Practice and Guidance for Habitat Surveying and Mapping. Heritage Council