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APPROPRIATE ASSESSMENT SCREENING OF THE PROPOSED RE-DEVELOPMENT OF THE LONGFORD GREYHOUND STADIUM SITE, TOWNPARKS, LONGFORD

Longford County Council
Áras an Chontae
Great Water Street
Longford

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1 INTRODUCTION

1.1 BACKGROUND

Article 6 of the EU Habitat's Directive (Council Directive 92/43/EEC) requires that all plans and projects be screened for potential effects upon Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). The aim of this screening process is to establish whether or not a full Appropriate Assessment of the proposed plan or project is necessary.

A comprehensive assessment of the potential significant effects of proposed works (Re-Development of the Longford Greyhound Stadium) on European designated sites (Natura 2000 sites) was carried out in June 2025 by Noreen McLoughlin, MSc, MCIEEM of Whitehill Environmental. This assessment will allow the Competent Authority, i.e., Longford County Council, to undertake an Appropriate Assessment determination, as required under Article 6(3) of the Habitats Directive. Permission for these works will be sought under Part 8 of the Planning Process.

The location of the proposed works are within 15km of sites designated under European Law. As such and in accordance with Article 6(3) of the EU Habitat's Directive (Council Directive 92/43/EEC) regarding Appropriate Assessment, this screening exercise for Appropriate Assessment was carried out in order to identify whether any significant impacts on designated sites are likely. This exercise will also determine the appropriateness of the proposed project, in the context of the conservation status of the designated sites.

1.2 REGULATORY CONTEXT

RELEVANT LEGISLATION

The Birds Directive (Council Directive2009/147/EC) recognises that certain species of birds should be subject to special conservation measures concerning their habitats. The Directive requires that Member States take measures to classify the most suitable areas as Special Protection Areas (SPAs) for the conservation of bird species listed in Annex 1 of the Directive. SPAs are selected for bird species (listed in Annex I of the Birds Directive), that are regularly occurring populations of migratory bird species and the SPA areas are of international importance for these migratory birds.

The EU Habitats Directive (92/43/EEC) requires that Member States designate and ensure that particular protection is given to sites (Special Areas of Conservation) which are made up of or support particular habitats and species listed in annexes to this Directive.

Articles 6(3) and 6(4) of this Directive also call for the undertaking of an Appropriate Assessment for plans and projects not directly connected with or necessary to the management of, but which are likely to have a significant effect on any European designated sites (i.e. SACs and SPAs).

The Water Framework Directive (WFD) (2000/60/EC), which came into force in December 2000, establishes a framework for community action in the field of water policy. The WFD was transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. 722 of 2003). The WFD rationalises and updates existing legislation and provides for water management on the basis of River Basin Districts (RBDs). RBDs are essentially administrative areas for coordinated water management and are comprised of multiple river basins (or catchments), with cross-border basins (i.e. those covering the territory of more than one Member State) assigned to an international RBD. The aim of the WFD is to ensure that waters achieve at least good status by 2027 and that status does not deteriorate in any waters.

Appropriate Assessment and the Habitats Directive

Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora – the 'Habitats Directive' - provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of European Community interest, at a favourable conservation status. Articles 3 - 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as *Natura 2000*. Natura 2000 sites are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC).

Articles 6(3) and 6(4) of the Habitats Directive sets out the decision-making tests for plans or projects affecting Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment:

"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."

Article 6(4) deals with the steps that should be taken when it is determined, as a result of appropriate assessment, that a plan/project will adversely affect a European site. Issues dealing with alternative solutions, imperative reasons of overriding public interest and compensatory measures need to be addressed in this case.

Article 6(4) states:

"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, the Member States shall take all compensatory measures necessary to ensure that the overall coherence of 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 beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

<u>The Appropriate Assessment Process</u>

The aim of Appropriate Assessment is to assess the implications of a proposal in respect of a designated site's conservation objectives.

The 'Appropriate Assessment' itself is an assessment which must be carried out by the competent authority which confirms whether the plan or project in combination with other plans and projects will have an adverse impact on the integrity of a European site.

Screening for Appropriate Assessment shall be carried out by the competent authority as set out in Section 177U(1) and (2) of the Planning and Development Act 2000 (as amended) as follows:

'(1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

(2) A competent authority shall carry out a screening for appropriate assessment under subsection (1) before—

(a) a Land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made, or

(b) consent for a proposed development is given.'

The competent authority shall determine that an Appropriate Assessment is not required if it can be excluded, that the proposed development, individually or in combination with other plans or project will have a significant effect on a European site.

Where the competent authority cannot exclude the potential for a significant effect on a European site, an Appropriate Assessment shall be deemed required.

Where an Appropriate Assessment is required, the conclusions of the Appropriate Assessment Report (Natura Impact Statement (NIS)) should enable the competent authority to ascertain whether the plan or proposed development would adversely affect the integrity of the European site. If adverse impacts on the integrity of a European site cannot be avoided, then mitigation measures should be applied during the appropriate assessment process to the point where no adverse impacts on the site remain. Under the terms of the Habitats Directive consent can only be granted for a project if, as a result of the appropriate assessment either (a) it is concluded that the integrity of any European sites will not be adversely affected, or (b) after mitigation, where adverse impacts cannot be excluded, there is shown to be an absence of alternative solutions, and there exists imperative reasons of overriding public interest for the project should go ahead.

Section 177(V) of the Planning and Development Act 2000 (as amended) outlines that the competent authority shall carry out the Appropriate Assessment, taking into account the Natura Impact Statement (amongst any other additional or supplemental information). A determination shall then be made by the competent authority in line with the requirements of Article 6(3) of the Habitats Directive as to whether the plan or proposed development would adversely affect the integrity of a European site, prior to consent being given.

2 METHODOLOGY

2.1 APPROPRIATE ASSESSMENT

This Statement of Screening for Appropriate Assessment (Stage 1) has been prepared with reference to the following:

- European Commission (2018). Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.
- European Commission (2021). 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 (2006). Nature and Biodiversity Cases: Ruling of the European Court of Justice.
- European Commission (2007). Clarification of the Concepts of: Alternative Solution, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission.
- Department of Environment, Heritage and Local Government (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.
- The AA has also been undertaken in consideration of the European Union (CJEU) judgment on Case C323/17 (People over Wind, Peter Sweetman v Coillte Teoranta), which concluded that "it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects [mitigation] of the plan or project on that site.". Other caselaw relevant to Screening are Waddenzee (C127/02), Holohan and Others v An Bord Pleanála (C461/17) and Court of Appeal case C1/2009/0041/QBACF Citation No [2009] EWCA Civ. 1061.
- Most recent and pertinent case law pertaining to AA screening comes from *Eco Advocacy v. An Bord Pleanála* Case C-721/21. This case recently determined that "standard design measures" can be included at design stage if they are an inherent part of the plan, namely a measure: *'incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site'.*

The EC Guidance sets out a number of principles as to how to approach decision making during the process. The primary one is 'the precautionary principle' which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty.

When considering the precautionary principle, the emphasis for assessment should be on objectively demonstrating with supporting evidence that:

- There will be no significant effects on a Natura 2000 site;
- There will be no adverse effects on the integrity of a Natura 2000 site;
- There is an absence of alternatives to the project or plan that is likely to have an adverse effect to the integrity of a Natura 2000 site; and
- There are compensation measures that maintain or enhance the overall coherence of Natura 2000.

This translates into a four stage process to assess the impacts, on a designated site or species, of a policy or proposal.

The EC Guidance states that "each stage determines whether a further stage in the process is required". Consequently, the Council may not need to proceed through all four stages in undertaking the Appropriate Assessment.

The four-stage process is:

Stage 1: Screening – The process which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether or not these impacts are likely to be significant;

Stage 2: Appropriate Assessment – The consideration of the impact on the integrity of the Natura 2000 site of 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 objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site;

Stage 4: **Assessment where no alternative solutions exist and where adverse impacts remain –** An assessment of the compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

In complying with the obligations set out in Articles 6(3) and following the guidelines described above, this screening statement has been structured as a stage by stage approach as follows:

- Description of the proposed project;
- Identification of the Natura 2000 sites close to the proposed development;
- Identification and description of any individual and cumulative impacts on the Natura 2000 sites likely to result from the project;
- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

2.1 STATEMENT OF COMPETENCY

This AA Screening report was carried out by Noreen McLoughlin, BA, MSc, MCIEEM. Noreen has an honours degree in Zoology and an MSc in Freshwater Ecology from Trinity College, Dublin and she has been a full member of the Chartered Institute of Ecology and Environmental Management for over nineteen years. Noreen has over 21 years' experience as a professional ecologist in Ireland.

2.2 DESK STUDIES & CONSULTATION

Information on the site and the area of the proposed development was studied prior to the completion of this statement. The following data sources were accessed in order to complete a thorough examination of potential impacts:

- National Parks and Wildlife Service - Aerial photographs and maps of designated sites, information on habitats and species within these sites and information on protected plant or animal species, conservation objectives, site synopses and standard data forms for relevant designated sites.
- Environmental Protection Agency (EPA)- Information pertaining to water quality, geology and licensed facilities within the area;
- Myplan.ie – Mapped based information;
- National Biodiversity Data Centre (NBDC) – Information pertaining to protected plant and animal species within the study area;
- Bing maps & Google Street View – High quality aerials and street images;
- Longford County Council – Plans and information pertaining to the proposed Part 8 development; Information on planning history in the area for the assessment of cumulative impacts.

2.3 ASSESSMENT METHODOLOGY

The proposed development was assessed to identify its potential ecological impacts and from this, the Zone of Influence (ZoI) of the proposed development was defined. Based on the potential impacts and their ZoI, the Natura 2000 sites potentially at risk from direct, indirect or in-combination impacts were identified. The assessment considered all potential impact sources and pathways connecting the proposed development to Natura 2000 sites, in view of the conservation objectives supporting the favourable conservation condition of the site's Qualifying Interests (QIs) or Special Conservation Interests (SCIs).

The conservation objectives relating to each Natura 2000 site and its QIs/SCIs are cited generally for SACs as "to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or Annex II species for which the SAC has been selected", and for SPAs "to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA".

As defined in the Habitat's Directive, the favourable conservation status of a habitat is achieved when:

- Its natural range and area it covers within that range is stable or increasing;
- 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;

The favourable conservation status of a species is achieved when:

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

Where site-specific conservation objectives (SSCOs) have been prepared for a European site, these include a series of specific attributes and targets against which effects on conservation condition, or integrity, can be measured. Where potential significant effects are identified, then these SSCOs should be considered in detail.

3 PROPOSED DEVELOPMENT

3.1 DEVELOPMENT DESCRIPTION

Longford County Council have indicated plans to progress with the re-development of the Longford Greyhound Stadium into a new community amenity and sports facility. Permission for these works will be sought under Part 8 of planning process.

The proposed project will consist of the following, and these works are presented in the site plan shown in Figure 1.

The project will consist of:

- Clearance of existing site, including demolition of the existing derelict building and ancillary structures on site.
- Installation of perimeter fencing and screen hedging.
- Construction of carpark area and ancillaries.
- Construction of an Astro Turf playing pitch and surrounding asphalt exercise loop.
- Construction of walkways / paths through proposed site.
- Provision of Outdoor Gym Equipment adjacent to pathways.
- Provision of youths play areas including playground equipment as outlined.
- Provision of planting and landscaped areas as shown.
- Construction of Boules, Basketball and Futsal playing courts.
- Construction of hard landscaping (paving and communal areas) as shown.
- Incorporation of time sensitive, smart ambient lighting to pathways and communal areas.
- Provision of Flood Lighting to Astro Playing pitch.

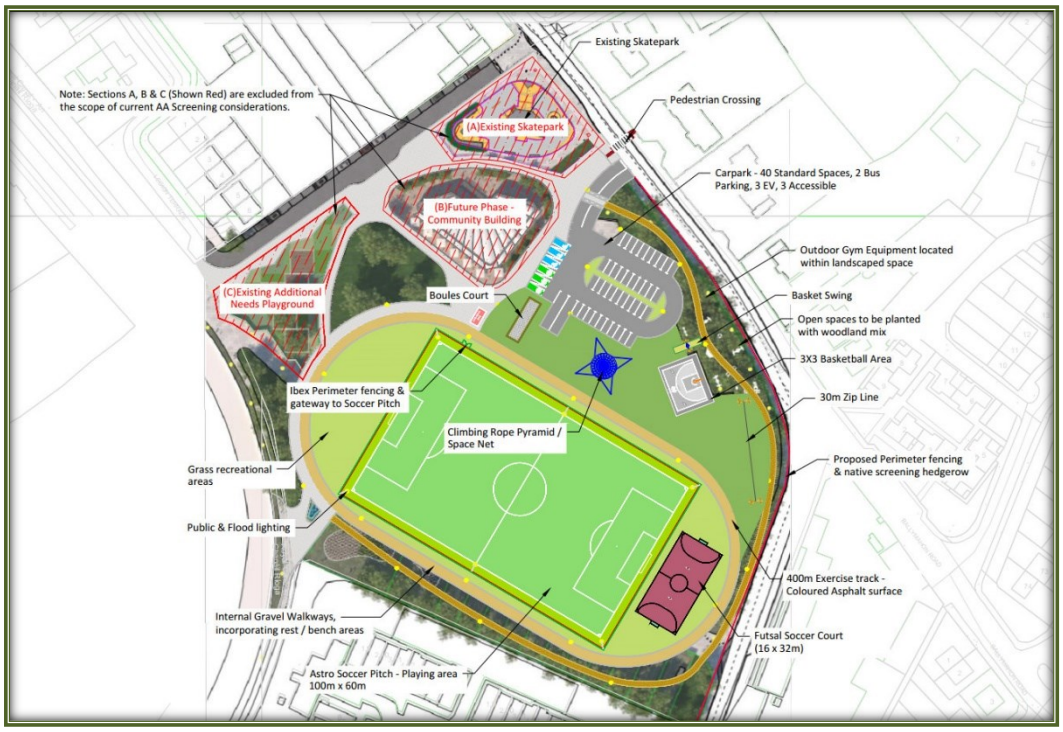


Figure 1– Extract from Planning Drawings (Prepared by Longford County Council)

Foul Water

There will be no toilets on site and there will be no foul water generated.

Surface Water

A surface water plan for the site has been prepared by Longford County Council. There is an existing open drain on the site that discharges into a chamber that drops to a level below the Royal Canal, which is adjacent to the site. This drain eventually leads to the River Camlin. Excess surface water run-off from the site will be discharged into this drain. All run-off from the car parking area will discharge through an oil interceptor, whilst the run-off from the astroturf pitch will discharge through a plastic bead interceptor.

Lighting

The proposed lighting design for the development has been prepared by Signify. 18 flood lights will be used in total, with column positions fixed at 15m in height.

3.2 SITE LOCATION AND SURROUNDING ENVIRONMENT

The application site is circa 2.98ha and it is situated in the townland of Townparks in Longford town, approximately 560m south-west of the town centre. The site will be accessed via the upgrading of the existing entrance into the site from Park Road. The site is bounded to the north-east by Park Road, to the north-west by private residential sites, to the west by The Royal Canal and its towpath and to the south / south-west by the Prospect Woods residential area.

The land use surrounding the site is mixed. The urban / suburban lands of Longford town largely surround the immediate area of site. These areas consist of industrial, residential, amenity and commercial uses and the dominant habitats associated with these areas include buildings and artificial surfaces and amenity grasslands and gardens. Beyond the urban / sub-urban areas of Longford town and in the rural lands outside of the town, agriculture is the dominant land use. The main habitat associated with this use is improved agricultural grasslands. Other habitats represented locally include semi-improved and wet grasslands, hedgerows, treelines and watercourses, including the Royal Canal and River Camlin. The location of the site is shown in Figures 2 and 3, whilst an aerial photo of the site and its surrounding habitats is shown in Figure 4.

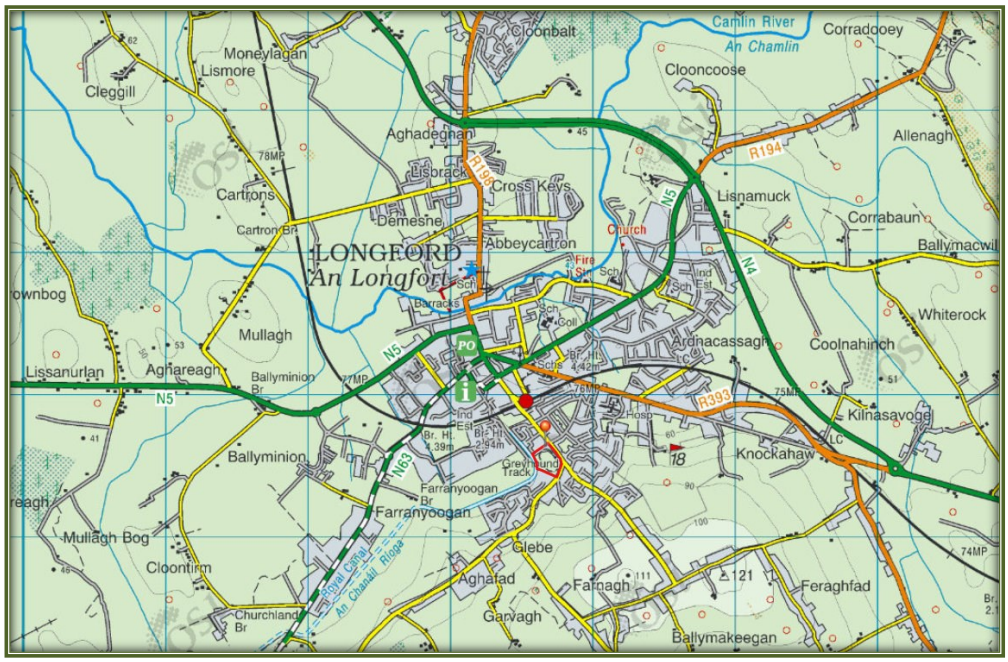


Figure 2 – Site Location Map (Site Pinned)

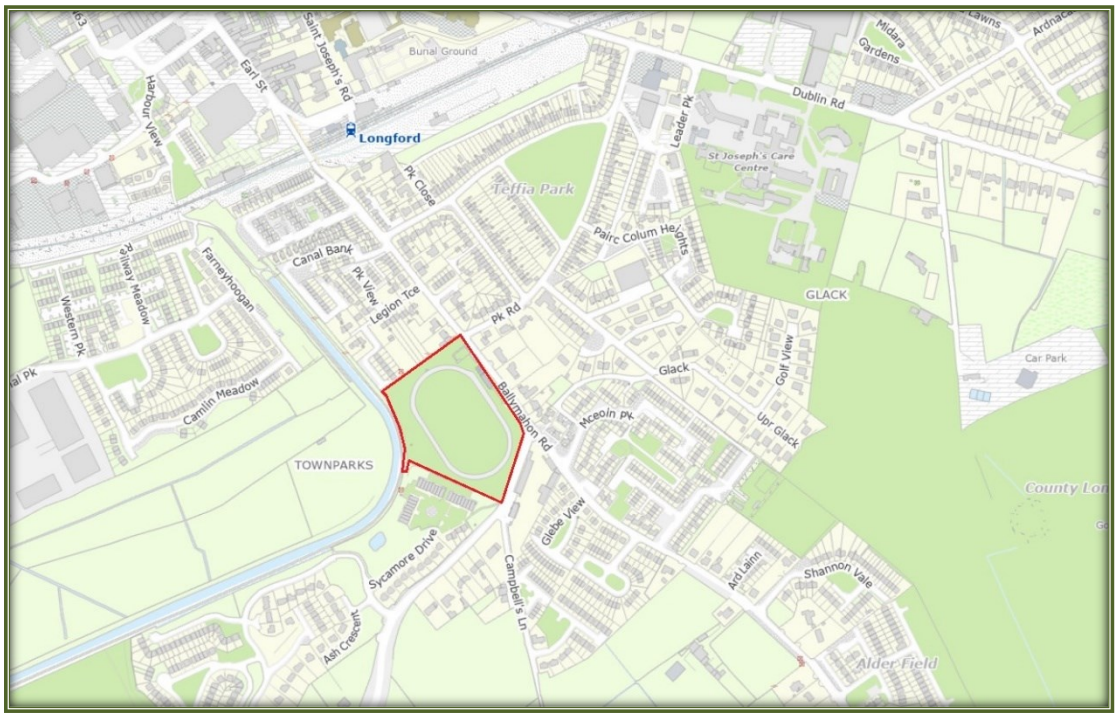


Figure 3 – Site Location Map. Application Site Outlined in Red.

HABITATS WITHIN THE SITE

No part of the site lies within any area designated for nature conservation purposes. The site comprises the former Longford Greyhound Stadium. The dominant habitats present include unmanaged grassland (previously maintained as amenity grassland) and areas of buildings and artificial surfaces, such as the existing skatepark, play area, spectator stands, and internal pathways. The site is bounded by walls and fences along Park Road and the Legion Terrace perimeter. Mature treelines are present along the perimeter adjoining the Royal Canal and along the southern boundary at Prospect Woods.

WATER FEATURES AND QUALITY

The application site is within the Upper Shannon Hydrometric Area (26) and Catchment (26c), the Upper Shannon Sub-Catchment (060) and the Camlin Sub-Basin (060). The site is adjacent to the Royal Canal which lies to the immediate west of the site. There is also a network of open drains in the fields to the west of the canal, and clean surface water from the site will be discharged to these drains, as per standard SUDS protocols that are integral to the overall design of the project. These drains eventually lead to the River Camlin, which is 1.1km north of the application site at its closest point (1.9km downstream via surface water discharge pathways).

The River Camlin rises in lands to the south of Granard. It flows in a south-westerly direction, though Longford town and on towards its confluence with the River Shannon near Clondra.

The EPA have classified the ecological status of the watercourses that are close to the application site along with the River Camlin downstream of Longford town as being of moderate ecological status. Further downstream, the status of the river deteriorates to poor. Under the requirements of the Water Framework Directive, this is unsatisfactory and good status must be achieved and maintained within all watercourses within the current WFD cycle (by 2027).

The EPA cite the main pressures on the River Camlin in this area as agriculture, hydro-morphology pressures and urban run-off.

The site is within the Longford-Ballinalee Groundwater Body and the current status of this groundwater body is good. This groundwater body is considered to be *Not at Risk*. Within the site itself, groundwater vulnerability is noted to be high.

Figure 4 – Aerial Photo of the Site © Google

4 STAGE 1 - AA SCREENING

4.1 NATURA 2000 SITES IDENTIFIED

In accordance with the guidelines issued by the Department of the Environment and Local Government, a list of Natura 2000 sites within 15km of the proposed development have been identified and described according to their site synopsis, qualifying interests and conservation objectives. In addition, any other sites further than this, but potentially within its zone of interest were also considered. The zone of impact may be determined by an assessment of the connectivity between the application site and the designated areas by virtue of hydrological connectivity, atmospheric emissions, flight paths, ecological corridors etc.

For significant effects to arise, there must be a potential impact facilitated by having a source, i.e., the proposed development and activities arising out of its construction or operation, a receptor, i.e., the European site and its qualifying interests and a subsequent pathway or connectivity between the source and receptor, e.g., a water course. The likelihood for significant effects on the European site will largely depend on the characteristics of the source (e.g., nature and scale of the construction works), the characteristics of the existing pathway and the characteristics of the receptor, e.g., the sensitivities of the Qualifying Interests (habitats or species) to changes in water quality.

There are seven Natura 2000 designated sites within 15km of the application site. These designated areas and their closest points to the proposed development site are summarised in Table 1 and a map and aerial photograph showing their locations relative to the application site are shown in Figures 5 and 6. A full description of these sites can be read on the website of the National Parks and Wildlife Service (npws.ie).

Site Name & Code	Distance	Qualifying Interests	Potential Significant Effects?
Brown Bog SAC 002346	3.6km west	• Active raised bogs • Degraded raised bogs still capable of natural regeneration • Depressions on peat substrates of the Rhynchosporion	*Screened Out - There is no hydrological or ecological connectivity between the application site and this SAC, therefore significant effects upon this site are not likely to arise from the construction and operation of the proposed development.*
Lough Forbes Complex SAC 001818	5.3km west / 6.5km downstream via the River Camlin	• Natural eutrophic lakes with Magnopotamion or Hydrocharition-type	*Screened Out – Having regards to the small size and scale of the redevelopment works combined with the overall separation distance between the application*

		vegetation • Active raised bogs • Degraded raised bogs still capable of natural regeneration • Depressions on peat substrates of the Rhynchosporion • Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*	*site and this SAC, then it is considered that significant effects upon this SAC can be ruled out. However, as there is a source-pathway-receptor linkage between the application site and this SAC via the proposed surface water management proposals, then the QIs of this SAC will be considered further.*
Ballykenny – Fisherstown Bog SPA 004101	5.3km west / 6.5km downstream via the River Camlin	• Greenland White-fronted Goose (*Anser albifrons flavirostris)*	*Screened Out – Having regards to the small size and scale of the redevelopment works combined with the overall separation distance between the application site and this SPA, then it is considered that significant effects upon this SPA can be ruled out. However, as there is a source-pathway-receptor linkage between the application site and this SPA via the proposed surface water management proposals, then the QIs of this SPA will be considered further.*
Mount Jessop Bos SAC 002202	4.1km south	• Degraded raised bogs still capable of natural regeneration • Depressions on peat substrates of the Rhynchosporion • Bog woodland	*Screened Out - There is no hydrological or ecological connectivity between the application site and this SAC, therefore significant effects upon this site are not likely to arise from the construction and operation of the proposed development.*
Clooneen Bog SAC 002348	10.1km north-west	• Degraded raised bogs still capable of natural regeneration • Depressions on peat substrates of the Rhynchosporion • Bog woodland	*Screened Out - There is no hydrological or ecological connectivity between the application site and this SAC, therefore significant effects upon this site are not likely to arise from the construction and operation of the proposed development.*
Lough Ree SAC 000440	14.2km south-west / 23km downstream via the River Camlin	• Otter (*Lutra lutra*) • Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation • Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco Brometalia*) • Degraded raised bogs still capable of natural regeneration • Alkaline fens • Limestone	*Screened Out - Having regards to the extensive hydrological separation distance between the application site and this SAC, it is considered that significant effects upon this SAC and its QIs will not arise during the construction and operation of the proposed development.*

		pavements • Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) • Bog woodland	
Lough Ree SPA *004064*	14.2km south-west / 23km downstream via the River Camlin	• Whooper Swan (*Cygnus Cygnus)* • Wigeon *(Anas penelope*) • Teal (*Anas crecca*) • Mallard (*Anas platyrhynchos*) • Shoveler (*Anas clypeata*) • Tufted Duck (*Aythya fuligula*) • Common Scoter (*Melanitta nigra)* • Goldeneye (*Bucephala clangula)* • Little Grebe (*Tachybaptus ruficollis)* • Coot (*Fulica atra)* • Golden Plover (*Pluvialis apricaria)* • Lapwing (*Vanellus vanellus)* • Common Tern (*Sterna hirundo)* • Wetlands	*Screened Out - Having regards to the extensive hydrological separation distance between the application site and this SPA, it is considered that significant effects upon this SPA and its QIs will not arise during the construction and operation of the proposed development.*

Table 1 – Natura 2000 Sites Within 15km of the Proposed Site

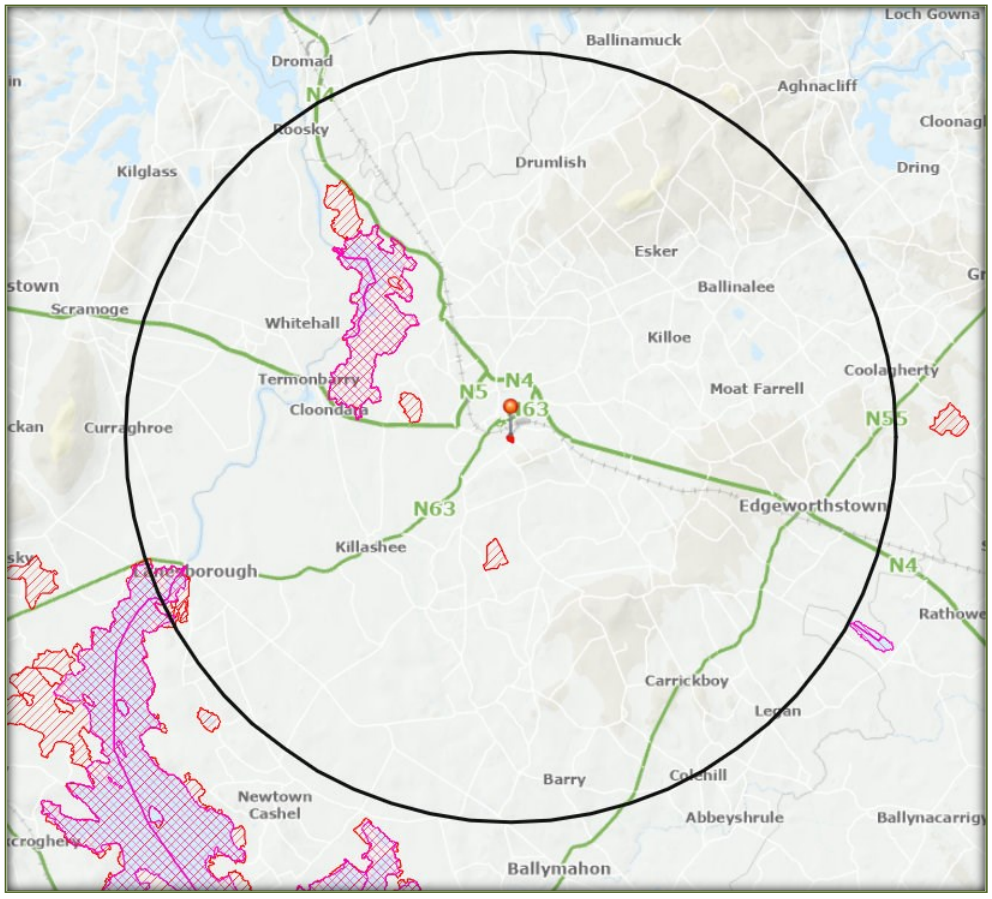


Figure 5 – The Application Site Route (Pinned) in relation to the Natura 2000 Sites Within 15km (SACs – Red Hatching, SPAs – Pink Hatching).

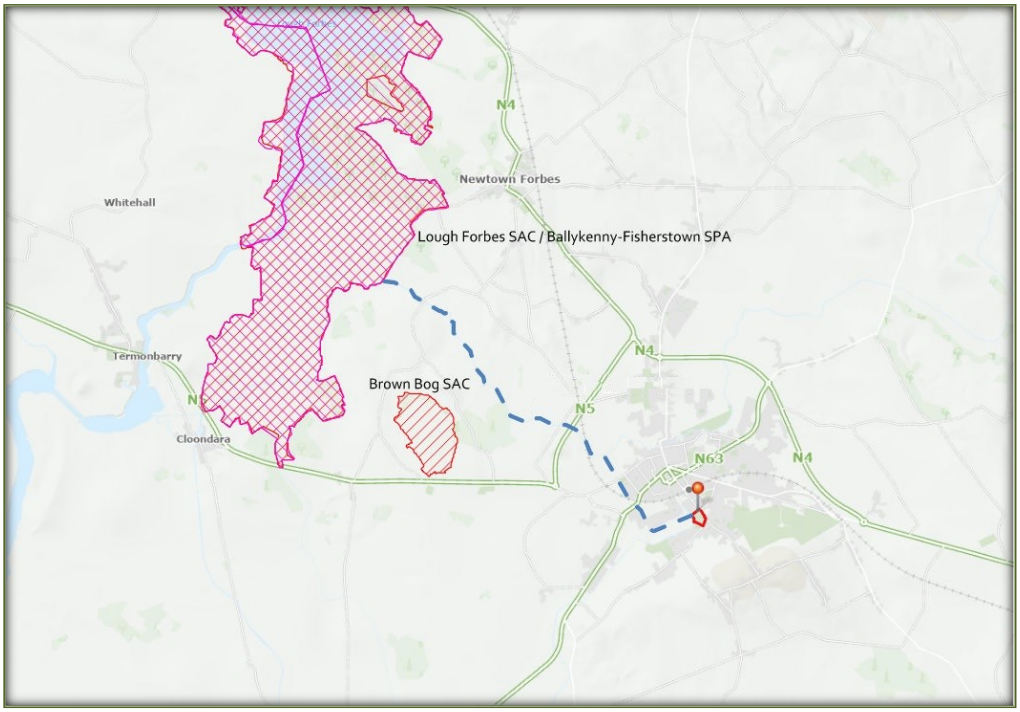


Figure 6 – The Application Site (Pinned) in relation to the Lough Forbes SAC and the Ballykenny-Fisherstown SPA. Hydrological Connectivity is Shown (6.5km)

LOUGH FORBES SAC 001818

NPWS Site Summary

Lough Forbes SAC is a complex of naturally eutrophic lake, fed by the River Shannon and Rinn River, with extensive reed bed development, and natural transitions to flooded grasslands, marsh and two active raised bogs. The Castle Forbes estate on the eastern shore of the lake is extensively planted with mature semi-natural woodland, including some stands of old oak wood.

Lough Forbes Complex is an extensive and important midland site which contains significant examples of the Annex I habitats natural eutrophic lake, active raised bog, alluvial woodlands, degraded raised bog and Rhynchosporion vegetation. Other habitats of note occurring include mixed ash/oak woodland, dry grassland and cutover raised bog. In many areas there are good examples of relatively undisturbed transitions from lake and river to adjoining terrestrial habitats such as wet grassland and raised bog. The lake, callow and raised bog areas provide feeding and roosting sites for a flock of wintering *Anser albifrons flavirostris.* The site is within a breeding territory of *Falco columbarius*.

Site Specific Conservation Objectives

In 2016, the NPWS published Site Specific Conservation Objectives (SSCOs) for this SAC[1]. These conservation objectives were also supported by a number of other documents relating to the bogland habitats of this SAC. For the Lough Forbes SAC, these SSCOs can be downloaded on the NPWS website. The NPWS Qualifying Interests and SSCOs of Lough Forbes are listed below in Table 2.

Habitat Name [Code]	SSCO	Attributes	Significant Effects
Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation) [3150]	To *restore* the favourable conservation condition of this habitat in Lough Forbes SAC	• Habitat Area • Habitat Distribution • Typical Species • Vegetation Composition • Vegetation Distribution • Hydrological Regime • Lake Substratum • Water Quality • Acidification Status • Water Colour • Dissolved Organic Carbon • Turbidity • Fringing Habitat	There will be no significant effects upon this QI arising from the proposed works. The application site is hydrologically connected to the River Camlin, which is a tributary of the River Shannon. The confluence of the River Shannon and Camlin is downstream of Lough Forbes itself and therefore the application site is not directly upstream of this habitat within the SAC and significant effects will not arise. Significant effects upon this QI can be screened out.

[1] *NPWS (2016) Conservation Objectives: Lough Forbes Complex SAC 001818. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.*

• Active raised bogs • Degraded raised bogs still capable of natural regeneration [7120] • Depressions on peat substrates of the Rhynchosporion	To *restore* the favourable conservation condition of this habitat in Lough Forbes SAC	• Habitat Area • Habitat Distribution • High Bog Area • Hydrological Regime • Transitional Areas • Vegetation Quality • Typical Active Raised Bog Species • Elements of Local Distinctiveness • Negative physical indicators • Vegetation composition • Air quality • Water quality	There will be no direct or indirect habitat loss or fragmentation of these habitats within the SAC. There will be no atmospheric emissions from the development which could affect the sensitive peatland vegetation of this SAC. There will be no changes to the hydrology of the bog. There will be no deteriorations in water quality in the high bog and transitional bog areas that could lead to negative effects upon these QIs. Significant effects upon this QI can be screened out.
Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae [91E0]	To *restore* the favourable conservation condition of this habitat in Lough Forbes SAC	• Habitat Area • Habitat Distribution • Woodland Size • Woodland Structure • Hydrological Regime • Vegetation Composition	There will be no loss or fragmentation of any area of this QI within the SAC. There will be no changes to hydrology or water quality which could lead to negative effects upon this QI. Significant effects upon this QI can be screened out.

Table 2 – SSCOs of the Lough Forbes SAC

BALLYKENNY-FISHERSTOWN BOG SPA

NPWS Site Summary

The lake and callow grasslands provide good habitat for a range of wintering waterfowl species, including regionally important flocks of *Cygnus cygnus*, *Anas crecca* and *Anas penelope*. Species such as *Phalacrocorax carbo* and *Aythya fuligula* are also represented but in low numbers. The bogs were formerly used by wintering Greenland White-fronted goose *Anser albifrons flavirostris* but these appear to have been now abandoned in favour of grassland sites elsewhere. *Falco columbarius* has been recorded and may breed in the site. *Lagopus lagopus* occurs on the bogs. A full description of this SPA can be read online on the website of the National Parks and Wildlife Service.

Site Specific Conservation Objectives

The NPWS has recently prepared SSCOs for this SPA[2] . These SSCOs are summarised below in Table 3.

Qualifying Interest	SSCO	Attribute – Measure - Target
Greenland White-fronted goose *Anser albifrons flavirostris* [A395]a	To *restore* the favourable conservation condition of this species in the SPA	• Winter Population Trend – Percentage Change in Number of individuals – Long term winter population trend is stable or increasing • Winter Spatial Distribution – Hectares, time and intensity of use – Sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target. • Disturbance at Wintering Site – Intensity, frequency, timing and duration – Disturbance occurs at levels that do not significantly impact the achievement of targets for the population trend and spatial distribution. • Barriers to Connectivity and Site Use – Number, location, shape and hectares – Barriers do not significantly impact the wintering population's access to the SPA or other ecologically important sites outside the SPA. • Forage spatial distribution, extent and abundance - Location, hectares, and forage biomass - Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target. • Roost spatial distribution and extent - Location and hectares of roosting habitat - Sufficient number of locations, area and availability of suitable roosting habitat to support the population target. • Supporting habitat: area and quality – Hectares and quality - Sufficient area of utilisable habitat available in ecologically important sites outside the SPA

Table 3 – Conservation Objectives for SPAs

Potential Effects upon the QIS of the Ballykenny-Fisherstown SPA

The potential significant effects of the proposed development in Townsparks on the Ballykenny-Fisherstown SPA have been considered. There is only one QI for this SPA, i.e., the Greenland White-Fronted goose. This species has not been recorded from the SPA since 1990 / 1991. The proposed development will not give rise to significant effects upon this species, or any other non-QI bird species that regularly use the lands within this SPA. There will be no fragmentation or decrease in any habitat that could be used by this bird and there will be no decrease in water quality in this SPA that could give rise to significant effects upon the Greenland white-fronted goose or any other bird species.

[2] *NPWS (2025) Conservation Objectives: Ballykenny-Fisherstown Bog SPA 004101. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.*

5 IMPACT ASSESSMENT

The potential impacts of the proposed development upon the Lough Forbes Complex SPA and the Ballykenny-Fisherstown SPA are described below.

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

The re-development of the Longford Greyhound Stadium into a community amenity facility will have no significant effects upon the designated sites identified, in particular the sites that are downstream of the River Camlin in Longford town, i.e., Lough Forbes SAC and the Ballykenny-Fisherstown SPA. There are no individual elements of the proposed application that are likely to give rise to significant negative effects on these aforementioned sites. The application site is 6.5km upstream of these sites, however no significant effects on the QIs of these sites are anticipated. Site specific mitigation measures are not required in this instance to prevent or reduce significant effects upon any Natura 2000 site.

Notes:

The SUDS measures proposed to serve the proposed development are standard and are not included for the protection of any designated site and they are not considered mitigation in terms of Appropriate Assessment. This is in line with the recent European Court of Justice ruling on SUDs in Case C-721/21 (Eco_Advocacy) which determined that such standard measures inherent to a project can be considered at AA screening stage..

Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the nearby Natura 2000 sites by virtue of:

Size and scale: Having regards to the small size and scale of the development in relation to the overall size of the Natura 2000 sites identified, the likelihood of any direct, indirect or cumulative impacts on these designated sites arising from the construction and operation of the proposed development are low.

Land-take: There will be no land-take from any designated site. There will be no interference with the boundaries of any designated site.

Distance from Natura 2000 site or key features of the site: There are 7 Natura 2000 sites within 15km of the application site. The closest site is Brown Bog SAC which is 3.6km west. The Lough Forbes Complex SAC / Ballykenny-Fisherstown SPA is 5.3km west and 6.5km downstream of the application site. In this instance, these distances are sufficient to ensure that significant effects upon these sites do not arise.

Resource requirements (water abstraction etc.): No resources will be taken from any Natura 2000 site and there are no resource requirements that will impact upon any designated site.

Emissions: There will be no hydrological or atmospheric emissions from the proposed development that could give rise to significant effects upon the QIs of the Lough Forbes Complex SAC / Ballykenny-Fisherstown SPA or any other designated site. There are no watercourses on the site itself and there will be no run-off from constructional works into any watercourse that leads to any SAC / SPA.

During operation, clean water from the site will be directed to a local drain, as per the existing situation. These works are standard SUDS methods. They are not being included for the protection of any Natura 2000 site and they are integral to the overall operation of the site (Refer to Case C-721/21 - Eco_Advocacy).

The separation distance between the application site and all Natura 2000 sites is considered sufficient to ensure that emissions such as noise, light, dust, airborne pollutants, and vibrations generated during the works will not have significant effects on these designated sites.

Excavation requirements: All vegetation and soil that will be generated during works will be transported off site by a registered contractor and disposed of or used at a location to be agreed with Longford County Council prior to removal. It will not be disposed of within any area of biodiversity value.

Transportation requirements: There will be no additional transportation requirements resulting from the proposed development and associated works that will have any impact upon the Natura 2000 sites identified.

In-Combination / Cumulative Impacts: The proposed application was considered in combination with other developments or proposed developments in the Longford area and potential cumulative impacts were considered. Any individual application that has the potential to impact upon a Natura 2000 site will be subject to Appropriate Assessment as required under Articles 6(3) of the Habitats Directive. The application will have no cumulative impacts upon any designated site when considered in combination with developments that have been properly screened for AA, or where an NIS has been completed and mitigation measures are included as part of that development.

Duration of construction, operation, decommissioning etc: Once the development of the site begins, it should be complete within months.

Describe any likely changes to the nearby Natura 2000 sites arising as a result of:

Reduction of habitat area: The proposed development lies outside the boundaries of the Natura 2000 sites identified in Section 3.3. There will be no reduction of designated habitat area. There will be no interference with the boundaries of any designated site. The habitat qualifying interests of Lough Forbes SAC include:

- Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation
- Active raised bogs
- Degraded raised bogs still capable of natural regeneration
- Depressions on peat substrates
- Alluvial woodlands

None of these habitats occur within or adjacent to the application site. The proposed development will have no impacts upon any of the habitat qualifying interests of the Lough Forbes SAC.

Disturbance to key species: There will be no direct disturbance to any species listed in Annex I of the Birds Directive or Annex II of the Habitats Directive. There will be no reduction in water quality in any designated site arising from the proposed development, therefore any indirect impacts upon listed species will be avoided. There will no loss of habitat associated with the protected bird species of the Ballykenny-Fisherstown SPA.

Habitat or species fragmentation: There will be no habitat or species fragmentation within any SAC or SPA. No ecological corridors between the site and any designated site will be damaged or destroyed.

Reduction in species density: There will be no reduction in species density within the SAC and SPA.

Changes in key indicators of conservation value (water quality etc.): There will be no negative impacts upon surface or ground water quality within the Lough Forbes SAC / Ballykenny-Fisherstown SPA. There will be no negative impacts upon the water quality in any designated site.

Describe any likely impacts on the nearby Natura 2000 sites as a whole in terms of:
Interference with the key relationships that define the structure or function of the site: It is not considered likely that there will be any impacts on the key relationships that define the structure or function of the Natura 2000 sites identified.
Provide indicators of significance as a result of the identification of effects set out above in terms of:
Loss - Estimated percentage of lost area of habitat: None **Fragmentation**: None **Disruption & disturbance**: None **Change to key elements of the site** (e.g. water quality etc.): None

5.1 FINDING OF NO SIGNIFICANT EFFECTS

Finding of No Significant Effects Report Matrix	
Name of project	Re-development of the Longford Greyhound Stadium, Townparks, Longford.
Name and location of Natura 2000 site	There are 7 Natura 2000 sites within 15km of the application site. The closest site is Brown Bog SAC which is 3.6km west. The Lough Forbes Complex SAC / Ballykenny-Fisherstown SPA is 5.3km west and 6.5km downstream of the application site. In this instance, these distances are sufficient to ensure that significant effects upon these sites do not arise.
Description of project	Longford County Council Part 8 Development
Is the project directly connected with or necessary to the management of the site?	No
Are there other projects or plans that together with project being assessed could affect the site?	No
The Assessment of Significance of Effects	
Describe how the project is likely to affect the Natura 2000 site	Having regard to the location, nature and scale of the proposed development, it is considered that there is no potential for significant effects either from the proposed development on its own or in combination with other plans and projects.
Explain why these effects are not considered significant	Not applicable as there is no potential for negative effects
Describe how the project is likely to affect species designated under Annex II of the Habitats Directive.	No effects likely
Data Collected to Carry out the Assessment	
Who carried out the assessment	Noreen McLoughlin, MSC, MCIEEM. Consultant Ecologist
Sources of data	NPWS, EPA, National Biodiversity Data Centre, Longford County Council
Level of assessment completed	Stage1 Appropriate Assessment Screening
Where can the full results of the assessment be accessed and viewed	Full results included

6 APPROPRIATE ASSESSMENT CONCLUSION

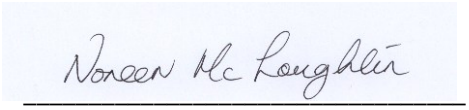
In accordance with Article 6(3) of the Habitats Directive, the relevant case law, established best practice and the precautionary principle, this AA Screening Report has examined the details of the project in relation to the relevant Natura 2000 sites within 15km of the application site.

At this stage of the AA process, it is for the competent authority, i.e., Longford County Council, to carry out the screening for AA and to reach one of the following determinations:

a) AA of the proposed development is required if it cannot be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites;

b) AA of the proposed development is *not* required if it can be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites.

It is of the opinion of the author that an AA of the proposed development is not required as it can be excluded, on the basis of objective information provided in this report, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites.



Noreen McLoughlin, MSc, MCIEEM.
Ecologist.

(PI Insurance details available on request)