



An
Coimisiún
Pleanála

Inspector's Report ACP-323461-25

Development	Proposed repair and refurbishment of Markievicz Bridge,
Location	Bridge Street, Sligo, County Sligo
Local Authority	Sligo County Council
Type of Application	Application for approval made under Section 177AE of the Planning and Development Act 2000 (local authority development requiring appropriate assessment)
Prescribed Bodies	Uisce Éireann
Observer(s)	None
Date of Site Inspection	29 th January 2026
Inspector	Niall Haverty.

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1.0 Introduction

- 1.1. Sligo County Council ('the Local Authority') is seeking approval from An Coimisiún Pleanála ('the Commission') to undertake repair and refurbishment works to Markievicz Bridge on Bridge Street in Sligo Town, within a site stated to be 0.2767 ha.
- 1.2. The bridge spans over the Garavogue River (also known as the Garvoge River), which is within the Lough Gill SAC, a designated European site. There are several other designated European sites (SPAs and SACs) in proximity to the proposed works (see further analysis below). A Natura Impact Statement (NIS) and application under Section 177AE of the Planning and Development Act 2000, as amended ('the Act'), was lodged by the Local Authority on the basis of the proposed development's likely significant effect on a European site.
- 1.3. Section 177AE of the Act requires that where an Appropriate Assessment is required in respect of development by a local authority, the authority shall prepare an NIS and the development shall not be carried out unless the Commission has approved the development with or without modifications. Furthermore, Section 177V of the Act requires that the Appropriate Assessment shall include a determination by the Commission as to whether or not the proposed development would adversely affect the integrity of a European site and the Appropriate Assessment shall be carried out by the Commission before consent is given for the proposed development.

2.0 Proposed Development

- 2.1. The proposed development is described as follows:
 - Repair scour damage to existing bridge piers and abutments.
 - Repair scour damage to riverbed under and in the curtilage of the structure.
 - Cleaning, removing vegetation and repointing of masonry of structure.
- 2.2. The application was accompanied by the following documents:
 - Cover Letter.
 - AA Screening Report and Natura Impact Statement (NIS).

- Outline Construction Management Plan.
- Summary Planning Report.
- Outline Traffic Management Plan.
- Preliminary Health and Safety Plan.
- Site Specific Flood Risk Assessment.
- Construction and Environmental Management Plan (CEMP).
- Ecological Impact Assessment.
- Preliminary EIA Screening Note.
- Baseline Bat Report.
- Architectural Heritage Impact Assessment.
- Underwater Archaeological Impact Assessment.
- Section 50 approval.
- Engineering drawings, bathymetric, river channel and topographic survey drawings.
- Notices and notifications to prescribed bodies.

3.0 Site and Location

- 3.1. Markievicz Bridge crosses over the Garavogue River in Sligo Town Centre in a north-south orientation linking Thomas Street (R870) to Bridge Street (R286). It is one of three vehicular bridges over the river in Sligo Town, the others being Hyde Bridge and the more substantial Hughes Bridge which carries the N4 National Road, both of which are to the west (downstream).
- 3.2. Markievicz Bridge is a seven-arch stone bridge dating from the 17th century. It is a Protected Structure, is included on the National Inventory of Architectural Heritage as being of Regional importance and is within a Recorded Archaeological Monument (Town).
- 3.3. Vehicular traffic flows on the bridge are one-way, with two lanes of southbound traffic as well as a pedestrian footpath on the west (downstream) site.

4.0 Planning History

4.1. I am not aware of any recent relevant planning history.

5.0 Legislative and Policy Context

5.1. Relevant Legislative Provisions

5.1.1. The EU Habitats Directive (92/43/EEC)

5.1.2. This Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) and 6(4) require an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European Site (SAC or SPA).

5.1.3. European Communities (Birds and Natural Habitats) Regulations 2011

5.1.4. These Regulations consolidate 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 judgements. The Regulations in particular require in Reg 42(21) that where an appropriate assessment has already been carried out by a 'first' public authority for the same project (under a separate code of legislation) then a 'second' public authority considering that project for appropriate assessment under its own code of legislation is required to take account of the appropriate assessment of the first authority.

5.1.5. National Nature Conservation Designations

5.1.6. The Department of Culture, Heritage and the Gaeltacht and the National Parks and Wildlife Service are responsible for the designation of conservation sites throughout the country. The three main types of designation are Natural Heritage Areas (NHA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and the latter two form part of the European Natura 2000 Network.

5.1.7. European sites located in proximity to the subject site include:

- Lough Gill SAC (Site Code 001976): Site is within the SAC.

- Cummeen Strand / Drumcliff Bay (Sligo Bay) SAC (Site Code 000627): c. 240m downstream.
- Cummeen Strand SPA (Site Code 004035): c. 700m downstream.

5.1.8. Nationally designated sites in proximity to the subject site include:

- Lough Gill pNHA: Site is within the pNHA.
- Cummeen Strand / Drumcliff Bay (Sligo Bay) pNHA.

5.1.9. Planning and Development Act 2000, as Amended

5.1.10. Part XAB of the Act sets out the requirements for the Appropriate Assessment of developments which could have an effect on a European site or its conservation objectives.

- Section 177AE sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
- Section 177AE(1) requires a local authority to prepare, or cause to be prepared, a Natura impact statement in respect of the proposed development.
- Section 177AE(2) states that a proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Commission has approved it with or without modifications.
- Section 177AE(3) states that where a Natura impact assessment has been prepared pursuant to subsection (1), the local authority shall apply to the Commission for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.
- Section 177V(3) states that a competent authority shall give consent for a proposed development only after having determined that the proposed development shall not adversely affect the integrity of a European site.
- Section 177AE(6)(a) states that before making a decision in respect of a proposed development the Commission shall consider the NIS, any submissions or observations received and any other information relating to:
 - The likely effects on the environment.

- The likely consequences for the proper planning and sustainable development of the area.
- The likely significant effects on a European site.

5.2. Policy and Guidelines of Relevance

- 5.2.1. The following policy and guidelines are considered relevant to the proposed development:
- 5.2.2. Water Action Plan 2024: A River Basin Management Plan for Ireland (WAP)
- 5.2.3. The WAP focuses on protecting and restoring water quality by preventing and reducing pollution, by restoring the natural ecosystem functions of rivers, and by continuing to invest in water infrastructure.
- 5.2.4. Architectural Heritage Protection Guidelines for Planning Authorities, 2011
- 5.2.5. The Guidelines recognise that there is a rich heritage of bridges throughout the country that requires careful consideration when any repair or alteration work is proposed.
- 5.2.6. Sligo County Development Plan 2024 – 2030
- 5.2.7. The following transportation infrastructure policies are noted:
- **P-RLR-2:** Continue investment in local roads infrastructure in County Sligo, in order to improve access to peripheral areas of the County and promote social inclusion.
 - **P-RLR-3:** Continue to maintain, repair, replace and preserve the County's bridges, the majority of which are over 150 years old and have a heritage value.
- 5.2.8. The following built heritage policies are noted:
- **P-AH-1:** Protect, manage, and enhance archaeological sites, monuments and landscapes, underwater archaeology (including protected wrecks), historic burial grounds (including their setting, appreciation and visual amenity) listed in the Record of Monuments and Places (RMP), Sites and Monuments Record (SMR), the Register of Historic Monuments, and any additional newly discovered archaeological sites and/or sub-surface archaeological remains.

This shall be done in accordance with conservation principles and best practice guidelines.

- **P-AH-2:** Require Archaeological Impact Assessment, surveys, test excavation and/or monitoring, as appropriate, for development in the vicinity of monuments or in areas of archaeological potential. Where there are upstanding remains, a visual assessment may be required.
- **P-AH-9:** Protect and preserve the archaeological value of underwater archaeological sites and associated features. In assessing proposals for development, the Council will take account of the potential underwater archaeology of rivers, lakes, intertidal and subtidal environments.
- **P-ARH-2:** Ensure that any development, modifications, alterations, or extensions affecting a protected structure, an adjoining structure or a structure within an ACA is sited and designed appropriately and is not detrimental to the character of the structure, to its setting or the general character of the ACA.
- **P-ARH-5:** Protect important non-habitable structures such as historic bridges, harbours, railways or non-structural elements such as roadside features (e.g. historic milestones, cast-iron pumps and post-boxes), street furniture, historic gardens, stone walls, landscapes, demesnes and curtilage features, in cases where these are not already included in the Record of Protected Structures.
- **P-HS-3:** Secure the preservation in-situ of surviving above-ground urban medieval and 16th/17th century structures, by ensuring that any permitted development does not result in the loss of such remains which may survive within buildings which are, or appear to be, of later date.

5.2.9. The following natural heritage policies are noted:

- **P-BD-1:** Protect, conserve, enhance and sustainably manage the natural heritage, biodiversity, geological heritage, landscape and environment of County Sligo.
- **P-BD-2:** Protect and, where possible, enhance the plant and animal species and their habitats that have been identified under EU Habitats Directive (92/43/EEC), the EU Birds Directive (2009/147/EC), European Communities

(Birds and Natural Habitats) Regulations 2011 (SI 477/2011) as amended, Flora (Protection) Order 2015, the Wildlife Act 1976 (as amended), and the Wildlife (Amendment) Act 2000 as amended, including all statutory instruments made under each act.

- **P-BD-3:** Ensure that the ecological impact of all development proposals on habitats and species are appropriately assessed by suitably qualified professionals, in accordance with best practice guidelines, taking full account of the precautionary principle where uncertainty exists.
- **P-BD-4:** Minimise adverse impacts of proposed developments on existing habitats (whether designated or not) by including mitigation and/or compensation measures as appropriate. This shall comprise the retention and enhancement of all possible existing habitats, vegetation and breeding sites in the early design stages of the development.
- **P-DSNC-1:** Protect and maintain the conservation status of all natural heritage sites designated or proposed for designation in accordance with European and national legislation and agreements.

These include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA), Ramsar Sites, Statutory Nature Reserves, as identified by the Minister for Culture, Heritage and the Gaeltacht, and any other sites that may be proposed for designation during the lifetime of this Plan.

In addition, the Council will identify, maintain and develop non-designated areas of high nature conservation value which serve as linkages or 'stepping stones' between protected sites in accordance with Article 10 of the Habitats Directive.

- **P-DSNC-2:** Promote the maintenance and, as appropriate, achievement of 'favourable conservation status' of habitats and species in association with the National Parks and Wildlife Service (NPWS).
- **P-DSNC-3:** Carry out an appropriate level of assessment for all development plans, land-use plans and projects that the Council authorizes or proposes to undertake or adopt, to determine the potential for these plans or projects to

impact on designated sites, proposed designated sites or associated ecological corridors and linkages in accordance with the Habitats Directive. All appropriate assessments shall be in compliance with the provisions of Part XAB of the Planning and Development Act 2000 (as amended).

- **P-DSNC-4:** Ensure that all development proposals are subject to the process of Screening for Appropriate Assessment and subsequent stages of Appropriate Assessment, as relevant, carried out to the satisfaction of the Planning Authority, in consultation with National Parks and Wildlife Service, as appropriate.
- **P-PS-1:** Ensure that development does not have a significant adverse impact incapable of satisfactory mitigation on plant, animal or bird species protected by law.
- **P-NCODS-3:** Ensure that proposals for development protect and enhance biodiversity, wherever possible, by minimising adverse impacts on existing habitats and by including mitigation and/or compensation measures, as appropriate, which ensure that biodiversity is enhanced.
- **P-INV-1:** Prevent and control the spread of invasive plant and animal species within the county.
- **P-INV-2:** Require all development proposals to address the presence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan, in compliance with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015.
- **P-INV-3:** Promote best practice in the control of invasive species when carrying out statutory functions of the County Council in association with relevant bodies, including TII, the Department of Transport and the Department of Rural and Community Development.
- **P-INW-1:** Protect rivers, streams and other water courses and their associated Core Riparian Zones (CRZs) from inappropriate development and maintain them in an open state, capable of providing suitable habitats for fauna and flora. Structures (e.g., bridges) crossing fisheries waters shall be

clear-span and shall be designed and built in consultation with Inland Fisheries Ireland.

- **P-INW-2:** Protect and enhance biodiversity richness by protecting rivers, stream corridors and valleys by reserving land along their banks for ecological corridors, maintaining them free from inappropriate development and discouraging culverting or realignment.
- **O-INW-1:** Consult with prescribed bodies prior to undertaking, approving or authorising any works or development that may impact on rivers, streams and watercourses.
- **O-INW-2:** Require that runoff from a developed area does not result in deterioration of downstream watercourses or habitats, and that pollution generated by a development is treated within the development area prior to discharge to local watercourses.
- **P-WQ-1:** Support the implementation of the EU Water Framework Directive, National River Basin Management Plan and Blue Dot Catchment Programme, to ensure protection and improvement of all waters in the County.
- **P-WQ-2:** Promote compliance with environmental standards and objectives established for surface and groundwater bodies under the Water Framework Directive (WFD).

Applications for development must demonstrate that such proposed development would not adversely affect the ability of any water body to meet its objectives under the Water Framework Directive, individually (as a result of the proposed development) or cumulatively (in combination with other developments). Evidence to this effect may include correspondence from Uisce Eireann.

- **P-WQ-4:** Prohibit any development which is likely to lead to the deterioration of the status of any water body (water quality).
- **O-WQ-2:** Protect, maintain, or improve water quality to the status set out in the national RBMP. All discharges to water bodies shall be licensed in accordance with the provisions of the Local Government (Water pollution) Acts 1977 & 1990.

6.0 Consultations

6.1. Prescribed Bodies

6.1.1. The application was circulated to the following bodies: An Taisce; An Chomhairle Ealaíon; Fáilte Ireland; The Heritage Council; Inland Fisheries Ireland; Uisce Éireann; and National Transport Authority.

6.1.2. The only response received was from **Uisce Éireann**. It can be summarised as follows:

- Uisce Éireann network assets are within the project area, namely a 200mm water main parallel to the bridge and a 300mm sewer main which crosses the river near to the bridge.
- UÉ does not permit build over of its assets and minimum separation distances as per their Standards, Codes and Practices must be achieved.
- Where this can't be achieved, applicant is required to engage with UÉ in advance and to enter into agreements as necessary to ensure access and protection of UÉ infrastructure.
- Condition recommended, requiring connection agreement with UÉ.

6.1.3. I also note correspondence from the Department of Housing, Local Government and Heritage (Development Applications Unit), dated 28th August 2023, which is included in Appendix A of the Summary Planning Report. It can be summarised as follows:

- A programme of pre-development underwater archaeological assessment of all in-stream works should be undertaken in advance of any construction contract to ensure the identification of any surviving underwater or terrestrial archaeological structures, features or deposits.

6.2. Public Submissions

6.2.1. None.

6.3. Response of Applicant to Submissions

6.3.1. The applicant's response to the submission from Uisce Éireann can be summarised as follows:

- They are aware of the UÉ watermains located within the bridge structure (within existing footpath, downstream side). No building works are proposed within minimum separation distance as per UÉ requirement of 500mm (IW-CDS-5020-03 clause 3.6.2.).
- They are aware of the UÉ sewer located adjacent to the structure (riverbed downstream side - between 3-7m upstream of the structure). No building works are proposed within the minimum separation distance as per UÉ requirement of 1 m (IW-CDS-5030-03 clause 3.20.7.).
- Applicant has no issues complying with the proposed UÉ standard Conditions as applicable.

7.0 EIA Screening

7.1. The proposed development which involves the repair and rehabilitation of an existing bridge is not a class of development under the classes listed Schedule 5 of the Planning and Development Regulations 2001, as amended, and therefore no EIA screening is required.

8.0 Assessment

8.1. Introduction

8.1.1. The assessment will be undertaken in three parts as per the requirements of Section 177AE as follows:

- The likely consequences for the proper planning and sustainable development of the area.
- The likely effects on the environment.
- The likely significant effects on a European site.

8.2. The Likely Consequences for the Proper Planning and Sustainable Development of the Area

- 8.2.1. Markievicz Bridge is a historic 17th century stone bridge which carries a regional road over the Garavogue River and it is one of the main vehicular and pedestrian river crossings in Sligo Town Centre. In addition to its important transportation function, it is an important architectural heritage feature in the town.
- 8.2.2. The need for the proposed rehabilitation works to the bridge is set out in the submitted Summary Planning Report.
- 8.2.3. The bridge has six large piers within the river channel and this, combined with the age of the structure, makes it inherently susceptible to scour damage to both the piers themselves and the riverbed between and in the vicinity of the piers. In a 'do nothing' scenario, where no rehabilitation works are undertaken, I am satisfied that scour damage would continue to worsen leading to potential structural damage which could impact the integrity of the bridge and endanger public safety. Similarly, the growth of vegetation in the stonework of the bridge will lead to increasing damage over time if not removed.
- 8.2.4. As detailed in Section 5.2 above, the Development Plan has a number of relevant policies. In particular, I note policy P-RLR-3 "Continue to maintain, repair, replace and preserve the County's bridges, the majority of which are over 150 years old and have a heritage value". There are also various policies to protect built and natural heritage in the county. Subject to consideration of environmental matters in the following sections, I consider that the proposed development is consistent with relevant Development Plan policies and objectives.
- 8.2.5. I note that the application included a letter from the OPW, granting consent under section 50 of the Arterial Drainage Act 1945, as amended, for the proposed works. The letter states that the works were incorporated into their hydraulic models and assessed for flow implications. They state that the works will have no effect on the Design Tidal Water Level and that the proposed works will restore the bridge arch dimensions to pre-scour conditions, consequently restoring water levels in the river to original levels.
- 8.2.6. I note the submission from Uisce Éireann, and the applicant's response thereto. Having regard to the nature of the proposed works which does not require a

connection to UÉ infrastructure and noting the separation distances from existing UÉ infrastructure, I am satisfied that no particular issues arise which would require conditions.

- 8.2.7. Having regard to the information submitted, I am satisfied that the proposed works are necessary and justified to safeguard the continued structural integrity and condition of an important and historic river crossing in a town centre setting. Subject to an assessment of the proposed development on the surrounding environment and European sites, I consider that the proposed bridge rehabilitation works are acceptable in principle and in accordance with the proper planning and sustainable development of the area.

8.3. The Likely Effects on the Environment

- 8.3.1. Having regard to the nature and scale of the proposed development, I consider that the main environmental effects to be assessed, other than those covered under the Appropriate Assessment, are as follows:

- Roads and traffic.
- Flood risk.
- Architectural Heritage.
- Underwater Archaeological Heritage.
- Biodiversity.

8.3.2. Roads and Traffic

- 8.3.3. A Preliminary Traffic Management Plan (PTMP), prepared by Punch Consulting Engineers was submitted with the application and it is envisaged that the appointed contractor will develop his own CTMP, in accordance with the PTMP.

- 8.3.4. As noted above, Markievicz Bridge serves an important traffic function within Sligo Town Centre, with two southbound vehicular traffic lanes and a footpath on one side for pedestrian movements across the Garavogue River. The junction of Bridge Street / Rockwood Parade / John F Kennedy Parade, on the southern side of the bridge, is signalled with a pedestrian crossing. It is an objective of Sligo County Council to

develop a 'Green Corridor' along both sides of the river to include walking, cycling and jogging routes, but this has not commenced at this time.

- 8.3.5. It is envisaged that there will be 8 personnel on site during peak construction activity, with c. 4 vehicles arriving and departing the site each day during this peak.
- 8.3.6. The proposed site compound for the works is on the southern side of the river, with a construction traffic route from the N4 via Bridge Street, southbound across the bridge then passing in a loop back to the south of the bridge along John F Kennedy Parade. Egress will be via Abbey Street, westward to the N4.
- 8.3.7. Sections 2.5 and 2.6 of the PTMP outline the measures that the contractor must take to manage construction traffic and prove compliance with the traffic restrictions. This includes appointment of a Temporary Traffic Operations Supervisor, communications, monitoring and restrictions on vehicle movements during peak hours and use of a pre-booking system for deliveries.
- 8.3.8. During the works to the bridge, it is proposed to reduce traffic to a single lane to facilitate a working area on the bridge, with temporary traffic lights. The existing traffic lights to the south of the bridge will be temporarily disabled, although the temporary traffic management will give priority to pedestrian crossings with the footpath maintained throughout the works. A number of full closures of the bridge will, however, be required to facilitate lifting of materials from the bridge to the in-stream works locations. Alternative river crossings are available to the west on the R292 and N4 and it is proposed to schedule such diversions outside of the peak commuter traffic times to be approved by SCC in advance.
- 8.3.9. Appendix B of the PTMP illustrates the existing and proposed construction phase vehicular and pedestrian traffic arrangements in the vicinity of the bridge.
- 8.3.10. Having reviewed the PTMP, and having regard to the limited scale, extent and duration of the proposed works, I am satisfied that the applicant has given adequate consideration to traffic matters and has developed a comprehensive proposal for construction traffic management. I do not consider that the proposed development will have a significant impact on traffic flows, other than in the very short term when full bridge closure is required, and neither do I consider that any vehicular or pedestrian traffic hazard will be created. The works, once complete, will ensure the function and condition of the bridge is safeguarded.

8.3.11. Flood Risk

- 8.3.12. A Site-Specific Flood Risk Assessment (FRA), prepared by Punch Consulting Engineers, was submitted with the application.
- 8.3.13. The OPW Flood Hazard Mapping website identifies a number of historic flood events in Sligo Town, but none in the immediate vicinity of Markievicz Bridge. The FRA does not consider that there is a groundwater flood risk in the vicinity of the bridge and with regard to pluvial flood risk, the presence of existing drainage infrastructure in the vicinity of the bridge is noted.
- 8.3.14. Based on OPW CFRAMS mapping, the Garavogue River is contained within its banks for the 10%, 1% and 0.1% AEP fluvial events in the vicinity of Markievicz Bridge. There is some out-of-banks flooding along John F Kennedy Parade to the east of the bridge in the 0.1% AEP fluvial event.
- 8.3.15. Similarly, for coastal flooding, the CFRAMS mapping indicates that coastal flood waters are contained within the banks of the river at Markievicz Bridge. The OPW's National Coastal Flood Hazard Mapping indicates small pockets of flooding adjacent to the bridge during the 0.5% and 0.1% AEP events.
- 8.3.16. Based on this information, the FRA considers that the bridge arches are located in Flood Zone A and that the bridge deck is located in Flood Zone C. I would agree with this assessment. With reference to the Flood Risk Management Guidelines for Planning Authorities, bridges are classified as 'water compatible development' which are 'Appropriate' in all Flood Zones and do not require a justification test.
- 8.3.17. The FRA does not address the implications of the proposed in-stream works on flood risk upstream or downstream of the bridge. I note that the river bed scour repair works will entail the placement of fill material and rock riprap on the riverbed. However, as this will restore eroded riverbed levels to the natural finished level (i.e. repairing scour damage), I am satisfied that there will be no material change to the carrying capacity or flow conditions in the river that could exacerbate flood risk elsewhere in the vicinity. Further to this, I note the OPW section 50 consent letter submitted with the application, which confirms this position.
- 8.3.18. I am satisfied that the proposed development is acceptable from a flood risk perspective.

8.3.19. Architectural Heritage

8.3.20. As noted above, Markievicz Bridge dates from the 17th century and is a Protected Structure and is identified on the NIAH as being of 'Regional' Importance. It is also close to, but not within, two Architectural Conservation Areas and is within a Zone of Archaeological Potential and is stated to be a recorded monument by virtue of being a pre-1700 structure located within the historic town of Sligo (RMP No. SL014-065).

8.3.21. An Architectural Heritage Impact Assessment (AHIA), prepared by Molloy & Associates Conservation Architects was submitted with the application. The AHIA sets out the history of the bridge, noting that it replaced a 12th century bridge and that it was widened in the 18th century and that remedial works to prevent scour were undertaken in the early-mid 20th century. Those works entailed the provision of concrete protections at the foot of each pier, a raised concrete base and the infilling of the southernmost arch.

8.3.22. The bridge is constructed of limestone, with rubble parapet walls and dressed stone voussoirs, keystones and cappings. Areas of pointing have failed, leading to vegetation growth on parts of the bridge and there is evidence of previous cement-based patch repointing which is noted to be visually disfiguring to the bridge and likely to result in damage to the adjacent limestone.

8.3.23. The extent of scour undermining of the piers is stated to be a concern for the structural integrity of the bridge. The repair works to the bridge will entail the replacement of existing concrete pier footings and their extension further below ground level and localised repointing works to the masonry spandrel, parapet and piers. The riverbed scour repair works in the vicinity of the bridge will delay its reoccurrence thus protecting the bridge in the future.

8.3.24. The AHIA outlines the special importance of the bridge from an architectural, historical and technical perspective and I agree with this assessment. The potential impacts of any works to the bridge structure must be suitably assessed and considered in the context of the bridge's considerable sensitivity and significance and the important contribution that it makes to the wider townscape and character of the area.

8.3.25. The existing 20th century concrete footings at the base of each pier, which were a previous attempt to address scour damage, have weathered over time and it is

proposed to remove and replace them with new concrete footings. I am satisfied that these works will not result in the loss of any historic bridge fabric and that the works are necessary and justified with reference to the need to ensure the long-term protection of the bridge from further scour damage. The proposed footings will effectively replicate what is there currently and the footings, while clearly modern concrete structures, will be harmonious with the historic limestone fabric of the bridge, particularly as the concrete weathers and acquires a patina similar to the limestone. It is of note that the visibility of the footings will be variable, and that they will be fully submerged during high tide.

8.3.26. With regard to the proposed riverbed scour repair works, I do not consider that these have the potential to impact on architectural heritage. Finally, with regard to the proposed removal of vegetation and repointing of masonry joints, I note that it is proposed to use lime mortar in a pointing style that maintains the original style. A detailed methodology for this repair work is set out in Section 5 of the AHIA.

8.3.27. Subject to appropriate supervision, I am satisfied that the proposed development will protect and enhance the architectural heritage characteristics of the bridge and that adverse impacts are unlikely to occur.

8.3.28. Underwater Archaeological Heritage

8.3.29. An Underwater Archaeological Impact Assessment (UAIA), prepared by Mizen Archaeology Ltd., was submitted with the application. This was prepared following consultation with DHLGH (DAU) and included a desktop study and metal detection survey.

8.3.30. The UAIA notes that the riverbed below the bridge shows signs of intense scouring, which appears to have removed original and later attempts at paving under the arches, with extensive damage to the riverbed. Given the changes to the bridge and riverbed over time, it is contended that the only cultural heritage feature which will be impacted by the works is the bridge itself and areas of riverbed less affected by scour.

8.3.31. A high positive impact is identified on the integrity of the bridge, by combating scour that is deepening the riverbed around the piers. A low impact on potential archaeology in the affected areas of riverbed is anticipated, due to scour-induced changes, although the potential to encounter mobile archaeological artefacts that

may have become trapped in scour depressions is identified. Similarly, the potential to encounter archaeological material in areas of riverbed less affected by scour is also identified.

- 8.3.32. Proposed mitigation measures, stated to have been developed in conjunction with the National Monuments Service, include archaeological monitoring by an experienced underwater archaeologist and a programme of metal detection of representative portions of removed material. It is also proposed to undertake all works in accordance with the DHLGH Architectural Heritage Protection Guidelines for Planning Authorities and the Advice Series booklet 'Ruins: The Conservation and Repair of Masonry Ruins'.
- 8.3.33. Subject to appropriate conditions relating to archaeological monitoring, I consider that there are not likely to be any significant adverse impacts on underwater archaeological features.
- 8.3.34. Biodiversity
- 8.3.35. The application is accompanied by, inter alia, an Ecological Impact Assessment (EclA), a Baseline Bat Report, a Natura Impact Statement, an EIA Screening Note and a Construction Environmental Management Plan and a copy of the OPW's consent for the works under section 50 of the Arterial Drainage Act 1945, as amended.
- 8.3.36. The Commission is advised that an Appropriate Assessment is carried out in Section 8.4, which considers if the proposed bridge repair and refurbishment works, individually or in combination with other plans and projects, would adversely affect the integrity of any European site in view of each relevant site's Conservation Objectives.
- 8.3.37. While potential effects on European Sites are addressed in Section 8.4, the bridge is also located with the Lough Gill pNHA, and the Cummeen Strand/Drumcliff Bay (Sligo Bay) pNHA is located c. 240m downstream with a hydrological connection. No other NHAs or pNHAs have the potential to be significantly affected, due to distance, the scale of the proposed development and/or lack of hydrological connectivity to the site.
- 8.3.38. The EclA states that consultation was held with IFI and the Dept. of Housing, Local Government and Heritage (DAU, DHLGH). IFI's primary concern was in relation to

the potential spread of pollutant materials, biosecurity and the in-stream works in the Garavogue River which provides spawning habitat for salmon, trout and lamprey. IFI noted that the habitat is very sensitive to pollution such as silt and that the river is already under environmental pressure with salmon stocks declining below their conservation limit. They also identified a need for all in-stream works to comply with their guidelines for such works, with a robust methodology for creating the dry working areas and biosecurity protocols in place. DHLGH noted the need for an AA to be undertaken, with complete, precise and definitive findings and conclusions. They also identified that there is known bat activity around the bridge and that suitable bat surveys should be carried out and that a description of the artificial lighting in the area of the bridge should be assessed and recommendations made for light reduction and dark sky standards for enhancement of habitat for fish, bats and other wildlife.

- 8.3.39. The EclA was informed by a desktop study and ecological walkover surveys of the bridge and surrounding areas carried out by project ecologists on a number of occasions at different times of year between 2022 and 2025. Bat surveys were also carried out in September and October 2024.
- 8.3.40. The WFD Status of the Garavogue River is 'Poor' for the 2019-2024 period and 'at Risk'. The Garavogue Estuary is also 'Poor', with its risk status under review. One Q-value of Q3 (Poor) was recorded immediately upstream of the proposed works, while no Q-Values have been recorded downstream.
- 8.3.41. The bridge is classified as Buildings and artificial surfaces (BL3) and other habitats in the immediate surrounds include footpaths, roads and commercial and residential buildings (BL3), a sparse treeline (Treeline – WL2) and an area of scrub (WS1). The Garavogue River within Sligo Town is categorised as a Tidal river (CW2) and it is c. 35m wide at the bridge with a fluctuating depth as a result of tidal influences and a weir structure located upstream. Non-native species including Winter Heliotrope (*Petasites fragrans*) were found on the right-hand bank upstream of the works area and Zebra mussel (*Dreissena polymorpha*) was recorded within the proposed works area in the Garavogue River. The habitats within the river are described in more detail in Section 8.4 below.

- 8.3.42. With regard to fisheries habitats, spawning habitat for salmonids, sea lamprey and river lamprey was considered to be good upstream of the bridge. Nursery habitat for salmonids was also considered good, while nursery habitat for lamprey species was considered moderate. Holding habitat for salmonids was considered moderate and habitat for European eel was also considered moderate. The EclA notes that the proposed works area only contains a very small percentage of the available good habitat within the river, with large areas of these suitable habitats further upstream.
- 8.3.43. Downstream of the bridge, the majority of the habitat within the proposed works area is considered too coarse and compacted to provide significant suitable spawning habitat for lamprey species or salmonids, except for a large gravel, sand and silt bed present from the edge of the LHB to the first bridge pier (c. 4m of riverbed in width), which provides good lamprey nursery habitat. Nursery habitat for salmonids is considered poor-moderate. Holding habitat for salmonids and habitat for European eel within the proposed working area was considered moderate-good.
- 8.3.44. Beneath the bridge arches, habitat was poor for lamprey and salmonid spawning and for nursery habitat.
- 8.3.45. A range of bird species typical of urban watercourses, including Grey Heron (*Ardea cinerea*), Grey Wagtails (*Motacilla cinerea*), Pied Wagtails (*Motacilla alba yarrellii*) Mute Swans (*Cygnus olor*) and Mallards (*Anas platyrhynchos*) were recorded downstream of the works area. No birds were recorded nesting within the bridge structure.
- 8.3.46. Otter surveys found no signs of otter (e.g. holts, slides, couches, prints, spraints or feeding remains) but it is likely that the species occurs at the site for commuting/foraging.
- 8.3.47. Bat surveys identified three bat species commuting and foraging across the works site, including Soprano pipistrelle, Common pipistrelle and Leisler's bat. The existing landscape within the site is considered to provide moderate habitats for commuting and foraging bats. One active roost was also recorded which is stated to be likely a small day roost or small maternity roost and not a hibernation roost.
- 8.3.48. With regard to invasive species, Zebra mussel (*Dreissena polymorpha*) was recorded within the proposed works area.

- 8.3.49. The identified Key Ecological Receptors (KERs) are the European Sites, pNHAs, QIs, aquatic fauna, otter, bats and birds.
- 8.3.50. Potential impacts on aquatic species and associated fauna are associated with: deterioration of water quality, loss of riverbed supporting habitat, disturbance and direct mortality and the creation of barriers to migration. Detailed mitigation measures are set out within the EclA, which are generally the same as those set out in the NIS (as detailed in Section 8.4 below). They include: use of an electric 1.5 tonne mini-digger as the only machinery permitted within the dry working area; marking out and exclusion from the suitable lamprey and salmonid nursery habitat downstream of the bridge; re-spreading of existing riverbed material over scour damaged areas to natural riverbed levels; no works during the spawning season for lamprey (May to June) and salmonid (November to March); in-stream works only during the fisheries open season (1st July to 30th September); consultation with IFI and in line with IFI Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters; establishments of a dry working area spanning half the river width using 1-tonne sand bags stacked at double height and electro-fished prior to dewatering of the works area; translocation of any lamprey ammocoetes potentially present in riverbed sediments or white-clawed Crayfish; hand-searching of any material removed from the riverbed for any aquatic fauna including lamprey and European eel with a second check once the material has been offloaded into the final disposal area; removal of all construction materials remaining within the dry working area following completion; appointment of an Ecological Clerk of Works (ECoW) to supervise works; use of a biosecurity protocol to avoid introduction/spread of invasive species.
- 8.3.51. Potential impacts on bats are associated with the potential loss of a known roost during re-pointing works, temporary loss of foraging/commuting habitat during the construction phase or disturbance. The proposed mitigation measures include a pre-commencement survey and inspection beneath the bridge arches to ensure that the known roost is clearly identified and to ascertain whether any additional crevices in the bridge have been occupied by bats; inspection of vegetation prior to removal to ensure that no bats are roosting within; supervision of all works beneath the arch with the known roost by ECoW; roost location to be clearly marked out and all staff made aware of its location; no steam cleaning or repointing works within 2m of the

roost location; temporary filling of all holes within the bridge structure not used by bats to prevent usage during the construction phase; erection of two artificial roosting brick structures onto the side of the bridge to provide additional bat roosting habitat; scaffolding will not be wrapped or panelled to avoid obstruction of commuting/foraging corridors and allow free bat movement; a derogation license has been granted from the NPWS in advance of the works and all works will adhere to all measures stipulated; no works will be undertaken outside of daylight hours; all vegetation removal, repointing and steam cleaning works undertaken below the arch with the known roost will be by hand; plant noise will be managed and plant turned off when not in use.

- 8.3.52. Potential impacts on otter are associated with deterioration of water quality affecting prey biomass and supporting habitat or disturbance to foraging/commuting otter. A pre-commencement survey will be carried out no more than 10 months in advance of construction works and should an otter holt be recorded within 150m of the proposed works a derogation license will be obtained from NPWS; all plant and equipment will comply with relevant noise regulations; operating machinery will be restricted to the dry working area created and the construction compound at street level; works during daylight hours only with no lighting; regular maintenance of plant; and measures to protect water quality.
- 8.3.53. The potential for impacts on birds is limited since the bridge is located in an urban setting subject to regular disturbance. No nests were found during the surveys carried out at the bridge, however there is potential for impacts if nests occupy the bridge in the period before construction commences. Water quality impacts may also affect waterbirds. Proposed mitigation measures include: pre-commencement survey to determine if any nesting birds have occupied the bridge structure; no works within 2m of any nest until any young have fledged and the nest is unoccupied; at least two bird boxes erected at the side of the bridge; ledges on the bridge structure which may provide suitable nesting habitat will be retained; construction noise will be managed and measures to protect water quality will be implemented.
- 8.3.54. The water quality mitigation measures which are relevant to the majority of the KERs are detailed in Section 8.4 of this report and include: controls on the timing of works; locations of stockpiles and storage areas; measures to control in-stream works and dewatering including use of silt bags, silt busters and monitoring; controls on

cementitious product and hydrocarbon usage; the role of the ECoW and detailed biosecurity protocols.

8.3.55. The EclA concludes that no significant residual impacts on any of the KERs are likely during the construction phase. No additional mitigation measures are identified for the operational phase given the lack of potential impacts.

8.3.56. The proposed mitigation measures set out in the EclA are comprehensive and detailed and are consistent with best practice guidance for works in and near watercourses. They are also consistent with those measures set out in the NIS, as detailed in Section 8.4 below. Subject to implementation of the measures, appropriate monitoring and appropriate conditions, including the appointment of a supervising Project Ecologist, I am satisfied that the proposed development will not give rise to any significant effects on biodiversity.

8.4. The Likely Significant Effects on a European Site

8.4.1. The areas addressed in this section are as follows:

- Compliance with Articles 6(3) of the EU Habitats Directive
- Geographical scope and main characteristics.
- Screening the need for Appropriate Assessment.
- Natura Impact Statement.
- Appropriate Assessment.

8.4.2. Compliance with Articles 6(3) of the EU Habitats Directive

8.4.3. The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires 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. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site.

- 8.4.4. I consider that the proposed development is not directly connected with or necessary to the management of any European site and that it is therefore subject to the provisions of Article 6(3).
- 8.4.5. Geographical Scope and Main Characteristics
- 8.4.6. Markievicz Bridge is located in Sligo Town Centre and comprises a 17th century stone bridge over the Garavogue River. The bridge comprises a number of arches, with piers located within the river and it carries vehicular and pedestrian traffic.
- 8.4.7. The bridge is located within the Bonet_SC_030 WFD sub-catchment and the Sligo Bay (35) WFD catchment. The Garavogue River (Garavogue_010) forms part of Lough Gill SAC (Site Code 001976) and the Garavogue Estuary (IE_WE_470_0100) is located c. 230m downstream. The Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code 000627) is located within the Garavogue Estuary and begins c. 240m downstream of the bridge. The Cummeen Strand SPA (Site Code 004035) is also located within the Garavogue Estuary, c. 700m downstream of the bridge.
- 8.4.8. The WFD Status of the Garavogue River is 'Poor' for the 2019-2024 period and 'at Risk'. The Garavogue Estuary is also 'Poor', with its risk status under review. One Q-value of Q3 (Poor) was recorded immediately upstream of the proposed works, while no Q-Values have been recorded downstream. The Garavogue River is a short river of 2km in length which connects Lough Gill to Sligo Bay and it is tidally influenced, with a weir and sluice gates located c. 350m upstream of the bridge. The river is c. 35m in width at the bridge location.
- 8.4.9. The bridge is not located within or hydrologically connected to any Margaritifera Sensitive Areas. The closest Margaritifera Sensitive Area is the Moy Catchment located 20km to the south west.
- 8.4.10. A desk study was undertaken, as well as multi-disciplinary walkover surveys on a number of dates between 2022 and 2025, both upstream and downstream of the bridge. This included otter surveys, non-native invasive species, river habitat, fisheries habitat and aquatic baseline surveys.
- 8.4.11. The bridge is classified as buildings and artificial surfaces (BL3) and the Garavogue River as a tidal river (CW2). Other habitats in the surrounding area include footpaths, roads and commercial and residential buildings (BL3), a sparse treeline (WL2) and an area of scrub (WS1). A variety of vegetation growth is present on the bridge

structure, including the non-native invasive species Butterfly bush (*Buddleja davidii*). Another non-native species Winter Heliotrope (*Petasites fragrans*) was found on the right-hand bank upstream of the bridge and Zebra mussel (*Dreissena polymorpha*) was recorded within the proposed works area in the Garavogue River.

8.4.12. Within the proposed works area upstream of the bridge, spawning habitat for salmonids, sea lamprey and river lamprey was considered to be good due to moderate to fast flowing waters, a large proportion of loose fine and large gravels which lamprey and salmonids could utilize to build redds, and a smaller presence of large boulders/cobbles for lamprey to anchor to. Nursery habitat within this area was also considered good for salmonids due to the variability in flow patterns from riffle to glide, well oxygenated waters and the presence of instream submerged vegetation for shelter and refuge. Nursery habitat for lamprey species was considered moderate due to limited areas of sandy and silty deposits located only in small amounts at the riverbanks. Holding habitat for salmonids was considered moderate in this upstream area due to the presence of occasional deeper pools near the LHB and in the channel and habitat for European eel was also considered moderate, due to the presence of boulders offering refuge and deeper pool areas. The NIS notes that the proposed works area only contains a very small percentage of the available good habitat within the river and that – further upstream and out of the works area – there are large areas of suitable salmonid and lamprey spawning gravels, salmonid nursery habitat, sandy and silty deposits providing good lamprey nursery habitat and deep pools with occasional overhanging riparian woody vegetation providing good holding habitat for salmonids and good habitat for European eel.

8.4.13. Downstream of the bridge, the majority of the habitat within the proposed works area consists of c. 50% Boulder and 35% Cobble substrates with the remaining predominantly of fine gravels. The NIS considers that this substrate is too coarse and compacted to provide significant suitable spawning habitat for lamprey species or salmonids. However, there is a large gravel, sand and silt bed present from the edge of the LHB to the first bridge pier (c. 4m of riverbed in width), which provides good lamprey nursery habitat. Nursery habitat for salmonids is considered poor-moderate due to the overall deeper waters downstream of the bridge. However, some areas of the channel presented ample instream submerged vegetation and riffle habitat resulting in transitional areas of riffle to glide where nursery age

salmonids may utilize. This habitat is located within the proposed dry working area, however none of the proposed riverbed scour repairs will be undertaken within this habitat area.

- 8.4.14. The habitat beneath the bridge arches is assessed as poor for lamprey and salmonid spawning due to the predominantly coarse substrate. While some fine sediments have deposited where the piers have scoured and in between the cobbles, boulders and masonry stones, the NIS considers it unlikely that these areas would provide significant supporting spawning habitat. Nursery habitat for salmonids and lamprey underneath the bridge was assessed as poor.
- 8.4.15. No signs of otter, including holts, slides, couches, prints, spraints or feeding remains, were found during the survey. However, it is considered likely that Garavogue river is utilised by otters for commuting/foraging.
- 8.4.16. The proposed works comprise the repair of riverbed scour damage, the repair of scour damage to the bridge abutments and removal of vegetation on the exterior of the bridge. A detailed description of the methodology for the works is set out in Section 2 of the NIS and it is stated that all repair works will be in accordance with CIRIA C742 Manual on scour at bridges and other hydraulic structures, including supplementary guides and the IFI Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters.
- 8.4.17. A construction site compound will be established at John F. Kennedy Parade, including car parking, deliveries area, material storage, welfare facilities, and a mobile crane as required.
- 8.4.18. A dry working area will then be established spanning half of the width of the Garavogue River at a time to ensure that water will always be allowed to flow freely around the dry working area. The total dry working area will be c. 980m² and it extends c. 6m upstream and c. 15.5m downstream of the bridge. The dry working area will be in place for the c. 6 month duration of the works (i.e. c. 3 months for each half of the proposed works).
- 8.4.19. The dry working area will be created by lifting tonne bags of clean inert sand into the section of the river to be dewatered using a mobile crane set up in the construction site compound at street level. The tonne bags will be double stacked and arranged to form the walls of the dewatered area. An impermeable, plastic membrane will be

used to seal off the area, with smaller sandbags used to fully seal the inside of the dewatering area.

8.4.20. The area will then be electrofished, following which a sump will be dug within the dry working area and water then pumped from inside the dewatering area using pumps located in the construction site compound through a silt buster into an area of the river confined by a silt curtain. Once the dry working area has been established, the structural masonry pier scour repairs, riverbed scour repairs and the de-vegetation works will be undertaken.

8.4.21. The bridge pier scour repairs will involve the removal of loose materials beneath the masonry piers where scour damage has occurred with hand excavation to competent material. Formwork and concrete will then be used around each pier, following which the riverbed immediately adjoining the work area will be repaired.

8.4.22. The riverbed scour repairs will involve rehabilitating the channel bed in the vicinity of the bridge and will only take place in limited areas of the riverbed that have scoured away creating scour holes. The scour repairs upstream of the bridge will require minimal works involving the re-spreading of the existing riverbed materials where scour damage has occurred to natural riverbed finish levels. The riverbed scour repairs beneath the bridge arches and downstream of the bridge will involve the use of a 1.5 tonne electric mini digger within the dry working area to infill the existing scour holes on the riverbed, the placement of a geotextile membrane layer along the riverbed and the use of granular fill material to in-fill larger scour holes. Rock rip-rap will be placed on top of the granular material and where riverbed material has deposited on the riverbed next to scour holes, this will be re-spread over the rock rip-rap, where possible with the riverbed finished to natural levels.

8.4.23. The de-vegetation works will be undertaken while the dry working area is in place by fully scaffolding the bridge elevations within the dewatered areas. The entire masonry surface area of the bridge will be de-vegetated by hand, cleaned using steam and/or abrasive clearing, and repointed with lime mortar.

8.4.24. Screening the Need for Appropriate Assessment

8.4.25. The first test of Article 6(3) is to establish if the proposed development could result in likely significant effects to a European Site. This is considered Stage 1 of the Appropriate Assessment process, i.e. screening. The screening stage is intended to

be a preliminary examination. If the possibility of significant effects cannot be excluded on the basis of objective information, without extensive investigation or the application of mitigation, a plan or project should be considered to have a likely significant effect and Appropriate Assessment shall be carried out.

8.4.26. Having regard to the information and submissions available, nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source-pathway-receptor principle and sensitivities of the ecological receptors, the European Sites set out in Table 1 below are the only sites considered relevant to include for the purposes of initial screening for the requirement for Stage 2 Appropriate Assessment on the basis of likely significant effects:

Table 1: European Sites considered for Stage 1 Screening			
European site (SAC/SPA)	Distance	Connections (source-pathway-receptor)	Considered further in screening (Y/N)
Lough Gill SAC (Site Code 001976)	Site is within the SAC	Hydrological connection – the bridge is within the SAC.	Y
Cummeen Strand / Drumcliff Bay (Sligo Bay) SAC (Site Code 000627)	Site is c. 240m upstream of SAC	Hydrological connection – the bridge is upstream of the SAC.	Y
Cummeen Strand SPA (Site Code 004035)	Site is c. 700m upstream of SPA	Hydrological connection – the bridge is upstream of the SAC.	Y
Ballysadare Bay SAC (Site Code 000622)	5.9km south west of site	No hydrological connectivity and no pathway for impacts given the limited scale and nature of the proposed works.	N
Ballysadare Bay SPA (Site Code 004129)	5.9km south west of site	No pathway for significant effects, due to the limited scale and nature of the proposed works, the heavily modified urban location of the bridge, the separation distance and	N

		the assimilative capacity of marine water.	
Union Wood SAC (Site Code 000638)	6.6km south of site	No hydrological connectivity to this terrestrial habitat and no pathway for impacts given the limited scale and nature of the proposed works and the separation distance.	N
Unshin River SAC (Site Code 001898)	6.9km south of site	No hydrological connectivity and no pathway for impacts given the limited scale and nature of the proposed works and the separation distance.	N
Ben Bulbin, Gleniff and Glenade Complex SAC (Site Code 000623)	7.3km north west of site	No hydrological connectivity and no pathway for impacts given the limited scale and nature of the proposed works and the separation distance.	N
Drumcliff Bay SPA (Site Code 004013)	5.4km north west of site	No pathway for significant effects, due to the limited scale and nature of the proposed works, the heavily modified urban location of the bridge, the separation distance and the assimilative capacity of marine water.	N
Sligo/Leitrim Uplands SPA (Site Code 004187)	5.6km north of site	No pathway for significant effects, due to the limited scale and nature of the proposed works, the heavily modified urban location of the bridge, the separation distance and the assimilative capacity of marine water.	N
Ballintemple and Ballygilgan SPA (Site Code 004234)	8.7km	No pathway for significant effects, due to the limited scale and nature of the proposed works, the heavily modified urban location of the bridge, the separation distance and the assimilative capacity of marine water.	N

8.4.27. Table 2 below provides a screening summary matrix for Lough Gill SAC, Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and Cummeen Strand SPA, where there is a

possibility of significant effects, or where the possibility of significant effects cannot be excluded without further detailed assessment.

- 8.4.28. Based on my examination of the NIS and supporting information, the NPWS website, aerial and satellite imagery, the scale and nature of the proposed development and likely effects, separation distance and functional relationship between the proposed works and the European Sites, their conservation objectives and taken in conjunction with my assessment of the subject site and the surrounding area, I would conclude that a Stage 2 Appropriate Assessment is required for the Lough Gill SAC, Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and Cummeen Strand SPA.
- 8.4.29. The remaining 8 No. sites can be screened out from further consideration because of the limited scale and extent of the proposed works, the separation distances and the lack of a substantive linkage between the proposed works and the European Sites. It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site Nos. 000622, 004129, 000638, 001898, 000623, 004013, 004187 or 004234 in view of the sites' conservation objectives and a Stage 2 Appropriate Assessment is not therefore required for those sites.
- 8.4.30. I am satisfied that no additional sites other than those assessed in the NIS need to be brought forward for Appropriate Assessment. I confirm that no mitigation has been taken into account at the screening stage.

Table 2: Screening Summary Matrix – European Sites for which there is a possibility of significant effects (or where the possibility of significant effects cannot be excluded without further detailed assessment)

Lough Gill SAC (Site Code 001976)			
Qualifying Interest feature	Is there a possibility of significant effects in view of the conservation objectives of the site?		
	General impact categories presented		
	Habitat loss/ modification	Water quality and water dependent habitats (pollution)	Disturbance/ displacement barrier effects
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] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Austropotamobius pallipes (White-clawed Crayfish) [1092] Petromyzon marinus (Sea Lamprey) [1095] Lampetra planeri (Brook Lamprey) [1096] Lampetra fluviatilis (River Lamprey) [1099] Salmo salar (Salmon) [1106] Lutra lutra (Otter) [1355]	Yes Potential for habitat loss due to riverbed scour repair works or habitat modification through spread of invasive species.	Yes Potential for release of contaminated surface water run-off and/ or accidental spillage or pollution event during construction.	Yes In-stream works may result in a barrier to migration or direct mortality/disturbance impacts on QI species such as lamprey and crayfish.

Cummeen Strand / Drumcliff Bay (Sligo Bay) SAC (Site Code 000627)

Qualifying Interest feature	Is there a possibility of significant effects in view of the conservation objectives of the site?		
	General impact categories presented		
	Habitat loss/ modification	Water quality and water dependent habitats (pollution)	Disturbance/ displacement barrier effects
Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] <i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130] Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210] Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014] <i>Petromyzon marinus</i> (Sea Lamprey) [1095] <i>Lampetra fluviatilis</i> (River Lamprey) [1099] <i>Phoca vitulina</i> (Harbour Seal) [1365]	Yes Potential for habitat loss due to riverbed scour repair works or habitat modification through spread of invasive species.	Yes Potential for release of contaminated surface water run-off and/ or accidental spillage or pollution event during construction.	Yes In-stream works may result in a barrier to migration or direct mortality/disturbance impacts on QI species.

Cummeen Strand SPA (Site Code 004035)

Qualifying Interest feature	Is there a possibility of significant effects in view of the conservation objectives of the site? General impact categories presented		
	Habitat loss/ modification	Water quality and water dependent habitats (pollution)	Disturbance/ displacement barrier effects
Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]	Yes No potential for direct loss or modification of habitat upon which these species depend. Primary wetland habitat for these species is 700m downstream. Potential for indirect effects on supporting habitat through spread or introduction of invasive species.	Yes Potential for indirect impacts on supporting habitats due to accidental spillage or pollution events during construction.	No No potential for direct disturbance or barrier effects to species due to location of bridge and nature of species.

8.4.31. Natura Impact Statement (NIS)

8.4.32. The application was accompanied by an NIS, prepared by MKO, which describes the proposed development, the project site and the surrounding area. The NIS contains a Stage 1 Screening Assessment which concluded that a Stage 2 Appropriate Assessment was required. The NIS outlines the methodology used for assessing potential impacts on the habitats and species within several European Sites that have the potential to be affected by the proposed development. It predicts the potential impacts for these sites and their conservation objectives, it suggests mitigation measures, assesses in-combination effects with other plans and projects and it identifies any residual effects on the European sites and their conservation objectives.

8.4.33. The NIS was informed by the following studies, surveys and consultations:

- A desk study, including review of: NPWS documentation for the designated sites; NPWS, EPA and NBDC web mappers; NPWS metadata and GIS data; IFI data.
- Multi-disciplinary walkover survey of the proposal site and surroundings including non-native invasive species search, otter surveys, aquatic baseline surveys, river habitat assessment, and fisheries habitat assessment.

8.4.34. The report concluded that, subject to the implementation of best practice and the recommended mitigation measures, it can be objectively concluded that the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

8.4.35. Having reviewed the NIS and the supporting documentation, I am satisfied that it provides adequate information in respect of the baseline conditions, clearly identifies the potential impacts, and uses best scientific information and knowledge. Details of mitigation measures are provided and they are summarised in Section 6 of the NIS. I am satisfied that the information is sufficient to allow for appropriate assessment of the proposed development (see further analysis below).

8.4.36. Appropriate Assessment of Implications of the Proposed Development on each European Site

8.4.37. The following is an assessment of the implications of the project on the relevant conservation objectives of the European Sites using the best scientific knowledge in the field. All aspects of the project which could result in significant effects are identified and mitigation measures designed to avoid or reduce any adverse effects are examined and assessed.

8.4.38. I have relied on the following guidance:

- DoEHLG (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, National Parks and Wildlife Service.
- EC (2002) Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EC
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- EC (2011) Guidelines on the implementation of the Birds and Habitats Directives in Estuaries and coastal zones.
- EC (2022) Guidance document on assessment of plans and projects in relation to Natura 2000 sites - A summary (European Commission. Directorate General for Environment).

8.4.39. **Relevant European Sites:** The following sites are subject to appropriate assessment:

- Lough Gill SAC (Site Code: 001976).
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627).
- Cummeen Strand SPA (Site Code: 004035).

8.4.40. A description of the sites and their Conservation Objectives and Qualifying Interests, including any relevant attributes and targets for these sites, are set out in the NIS and outlined in Tables 3 – 5 below. I have also examined the Natura 2000 data forms as relevant and the Conservation Objectives supporting documents for these sites available through the NPWS website (www.npws.ie).

8.4.41. **Aspects of the proposed development:** The main aspects of the proposed development that could adversely affect the conservation objectives of the European Sites include:

- Loss of, or disturbance to habitats or species.
- Potential Impairment of water quality.
- Introduction of invasive species.

8.4.42. **Tables 3 – 5** summarise the Appropriate Assessment and site integrity test. The Conservation Objectives, targets and attributes as relevant to the identified potential significant effects are examined and assessed in relation to the aspects of the project (alone and in combination with other plans and projects). Mitigation measures are examined, and clear, precise and definitive conclusions reached in terms of adverse effects on the integrity of European Sites.

8.4.43. Supplemental to the summary tables, any key issues that arose through consultation and through my examination and assessment of the NIS are expanded upon in the text below:

Table 3: Lough Gill SAC (Site Code: 001976)

Key Issues:

- Loss of, or disturbance to habitats or species
- Potential impairment of water quality
- Introduction of invasive species

Conservation Objectives: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001976.pdf

Summary of Appropriate Assessment

Conservation Objective: To <u>maintain</u> the favourable conservation condition of the following:	Targets & Attributes (as relevant)	Potential adverse effects?	All Mitigation Measures	In-combination effects	Can adverse effects on site integrity be excluded?
White-clawed Crayfish Austroptamobius pallipes [1092]	No reduction in distribution; juveniles and females with eggs in at least 50% of positive samples; no reduction in catch per unit effort from baseline of 0.25; no non-indigenous crayfish species; no instances of disease; water quality at least Q3-4 at all sites sampled by EPA; water quality maintained, particularly pH and nutrient levels; no decline	Yes Main population of species is found upstream in the Bonet River, in the upper catchment of the SAC. There are no records of the species downstream or in the vicinity of the bridge and no examples of this species were identified during surveys. Notwithstanding this, there is potential for introduction of invasive species or disease such	- <u>Disturbance/Mortality of QI Species During In-stream Works</u> * No works will take place during the spawning season for lamprey (May to June) and salmonid (November to March). * In-stream works will only be carried out during the fisheries open season (1 st July to 30 th September). * IFI will be consulted at least 1 month prior to the	No in-combination effects: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is	Yes Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.

	<p>in heterogeneity or habitat quality.</p>	<p>as Crayfish plague as a result of in-stream works. As such, there is a complete source-pathway-receptor chain for impacts from the proposed works to this QI.</p> <p>No potential for operational stage impacts.</p>	<p>outset of works and all works will take place under guidance of the IFI officer.</p> <p>* In-stream works will be carried out in line with IFI Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters.</p> <p>* A dry working area will be set up within the river using 1 tonne sand bags stacked at double height. The working area will be dewatered. However, in advance of dewatering, fish salvage from the works area will be undertaken via electro-fishing.</p> <p>* With regard to lamprey ammocoetes which may potentially be present in riverbed sediments, the following mitigation will be in place:</p> <p>* The translocation individuals will be relocated to a suitable similar river habitat location within the same grid reference.</p> <p>* Any material removed from the riverbed will be checked by an Ecologist under a Section 14 licence via manual hand search for</p>	<p>related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted.</p>	
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			<p>any aquatic fauna including lamprey and European eel. These species are known to rise to the surface of excavated material for easy recovery by net.</p> <p>* A second check for aquatic fauna will be carried out once the material has been offloaded into the final disposal area in order to ensure a thorough search through the excavated silt.</p> <p>* If White Clawed Crayfish are found within the working area, these will be safely translocated in a similar manner under licence.</p> <p>- <u>Biosecurity Protocols</u></p> <p>* Ensure staff are fully aware of protocol before commencement of works.</p> <p>* Instream works carried out in line with IFI Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters, IFI Biosecurity Protocol for Field Survey Work and IW-AO-SOP-010 Biosecurity Standard Operating</p>		
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			<p>Procedure for Aquatic Sampling.</p> <ul style="list-style-type: none"> * All plant and equipment cleaned thoroughly and disinfected before entering the water, including all machinery, pumps, hand tools, ropes etc. * All plant, equipment and clothing brushed down and disinfected. * Any imported materials must be certified free of invasive species. All imported materials will be fully cleaned down using disinfectant. * High-pressure steam cleaning of machinery with water > 40°C. * Disinfectant applied to undercarriage and wheels of vehicle and trailer after steam cleaning. * Footwear dipped in or scrubbed with disinfectant and thoroughly dried afterwards. * All PPE visually inspected and any attached vegetation/debris removed. 		
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			* Above cleaning and disinfection procedures will be carried out on all plant, machinery, equipment and clothing before entering the instream works area and after leaving the instream works area before working on a different site.		
Otter Lutra lutra [1355]	No significant decline in distribution or extent of terrestrial, marine and freshwater habitat; no significant decline in couching sites and holts; no significant decline in available fish biomass; and no increase in barrier to connectivity.	<p>Yes</p> <p>No sign of Otter was recorded in surveys and man-made banks in the vicinity of the bridge are unlikely to provide significant supporting habitat, There will be no direct loss of supporting habitat.</p> <ul style="list-style-type: none"> - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from equipment and machinery. - Potential introduction or spread of invasive species. 	<p><u>Disturbance to Otter</u></p> <ul style="list-style-type: none"> * Pre-commencement survey for otter prior to works commencing. Should an otter holt be recorded within 150m of the site, a derogation license will be obtained and works carried out in accordance with NRA Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes. Survey will be carried out no more than 10 months in advance of construction works commencing. * All plant and equipment will comply with the “European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations 1996”. * Operating machinery will be restricted to the dry 	<p>No in-combination effects:</p> <ul style="list-style-type: none"> - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted. 	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>

		<p>- Potential decrease in prey biomass due to fish kills in the event of a deterioration in water quality.</p> <p>Potential for disturbance to commuting routes, foraging or barriers to connectivity.</p> <p>- No potential for operational stage impacts.</p> <p>There is a complete source-pathway-receptor chain for impacts from the proposed works to this QI</p>	<p>working area created within the river and the construction site compound at street level.</p> <p>Work will be completed during daylight hours only. No lighting will be utilised during the construction phase.</p> <p>Regular maintenance of plant will be carried out in order to minimise noise emissions.</p> <p>- <u>Water Quality</u></p> <p>* Solid fencing around site compound to prevent surface water run off to the river.</p> <p>* Access routes clearly marked and access restricted to land within the identified works area.</p> <p>* No works during periods of high rainfall to reduce run-off, potential siltation of watercourses and potential inundation of the dry working area.</p> <p>* All waste collected in skips at street level and the site kept tidy and free of debris at all times.</p>		
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			<p>* Waste oils and hydraulic fluids collected in leak-proof containers and removed from the site for disposal or recycling.</p> <p>* All construction waste materials stored within the confines of the compound prior to removal to a permitted waste facility.</p> <p>* Stockpiling of materials will be carried out temporarily within the dry working area and periodically removed. No stockpiled materials will be left within the dry working area overnight. Temporary stockpiling within the construction site compound.</p> <p>* All in-stream works undertaken during dry weather periods and when river levels are low.</p> <p>* No in-stream works undertaken during Spring Tides. All materials and machinery will be removed prior to any Spring Tides or during periods of heavy rainfall.</p> <p>* IFI notified prior to the commencement of works and no instream works</p>		
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			<p>shall be carried out during the closed season (October 1st to June 30th).</p> <ul style="list-style-type: none"> * Construction will adhere to IFI Guidelines. * No in-stream works carried out outside of dry working area. * Dry working area will be fully sealed using 1 tonne bags filled with clean inert sand to avoid any water ingress. Smaller sandbags will also be used to fully seal the inside of the dewatering area from excessive water ingress, and to weigh down the impermeable plastic membrane. * Working area will be electro-fished in advance of dewatering. * Dewatering will be undertaken by digging a sump within the bunded dry working area, and pumping water out using a bunded pump located within the site compound at street level which will be fitted with a silt buster or silt bag to allow the water to trap silt 		
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			<p>and sediment remaining in the water.</p> <ul style="list-style-type: none">* A silt curtain will be established downstream of the dry working area, attached to the bankside.* Water from the dry working area will be pumped through the silt buster into the area confined by the silt curtain within the river. The mouth of the return pipe will be located behind the silt curtain within the river.* Automated turbidity meters will be installed upstream and downstream of the works area for suspended solids and these will be monitored regularly by the ECoW. If there is a 20% difference between the downstream and upstream readings, then works will be halted until the source of the problem is rectified.* No tools or potentially toxic materials will be stored or left within the dry working area overnight or when there is danger of the dry working area being inundated with water.		
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			<ul style="list-style-type: none"> * Biosecurity measures will be adhered to. * Outside of working hours, plant machinery will be parked within the dedicated vehicle parking area in the site compound. * Rewetting of the dry working area will only take place once all concrete is completely cured. * All concrete will be transferred to the dry working area by chute from the site compound into a fully sealed, bunded container. * All concrete placing will be conducted under controlled conditions to prevent runoff to the river. * All formwork will be constructed and sealed to prevent leakage or spillage and have sufficient capacity to support poured concrete. * Baseline pH values will be checked in the river prior to commencement and regular checks will be carried out on pumped water from the dry works area during cement works. If there is a significant pH 		
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			<p>difference, then all works will be halted until the source of the problem is rectified.</p> <ul style="list-style-type: none"> * No batching of wet concrete will occur within the dry working area. Only ready-mixed, self-compacting wet concrete products and pre-cast concrete will be used within the dry working area. * Raw or uncured waste concrete shall be disposed of by removal from the site. * Concrete trucks will be directed back to their batching plant for washout. * Clearly visible signs shall be placed in prominent locations stating that washout of concrete lorries is not permitted on the site. * Concrete pour sites shall be free of standing water to mitigate the risk of run-off being polluted with cementitious material. * Large concrete pours shall be avoided where prolonged periods of heavy rain are forecast, with covers available for use on freshly placed concrete to 		
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			<p>avoid the surface washing away in heavy rain.</p> <p>* No vehicles or machinery requiring hydrocarbons will be used within the dry working area on the riverbed. The only machinery in these areas will be an electric 1.5 tonne mini digger.</p> <p>* Storage of oils, fuel, chemicals, hydraulic fluids, etc. will be undertaken in accordance with current best practice on an impervious base within a bund at street level within a dedicated materials storage area.</p> <p>* All machinery operating on-site will be steam-cleaned and routinely checked to ensure no leakage of oils/lubricants.</p> <p>* Spill kits will be kept at the site compound at street level and accidental spills will be immediately contained and any contaminated soil removed and properly disposed of.</p> <p>* Oil booms and soakage pads will be kept at the site compound and fuel storage</p>		
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			<p>area to deal with any accidental spillage.</p> <ul style="list-style-type: none"> * No refuelling within the site compound. * Spill kits and hydrocarbon absorbent packs will be stored in the cabin of each vehicle and operators will be fully trained in the use of this equipment. * An Ecological Clerk of Works (ECoW) will be present during the entirety of the site set up of the in-stream works and the de-watering process. * ECoW will make regular visits to the site throughout the construction phase, including weekly visits at a minimum during the in-stream works. All mitigation measures will be thoroughly inspected, and the ECoW will initially be present on a daily basis until the site is set up and construction is underway. * ECoW will have the authority to stop all works on site if they have reasonable doubt that the prescribed mitigation 		
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			<p>measures are not being adhered to properly.</p> <p>* All site visit reports and documentation will be collated into a final report which will be sent to Sligo Co. Co. for review to ensure compliance with the mitigation measures.</p> <p>- <u>Biosecurity Protocols (as above)</u></p>		
To restore the favourable conservation condition of the following:	Targets & Attributes (as relevant)	Potential adverse effects?	All Mitigation Measures	In-combination effects	Can adverse effects on site integrity be excluded?
Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]	Stable/ increasing habitat area; no decline in habitat distribution; typical vegetation species present, in good condition and demonstrating typical abundance/distribution; all characteristic vegetation zones present, correctly distributed and in good condition; maintain vegetation maximum depth, subject to natural processes; maintain appropriate hydrological regime; maintain appropriate substratum type, extent and chemistry; maintain/restore	<p>No</p> <p>The closest example of this habitat occurs c. 3km upstream of the bridge and there is no example of it downstream. Given the lack of pathways to this habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.</p>	-	-	Yes

	<p>appropriate Secchi transparency; maintain/restore concentration of nutrients in the water column to sufficiently low levels; maintain appropriate water quality including high chlorophyll a status; maintain/restore appropriate water quality to support the habitat including high phytoplankton composition status; maintain/restore trace/absent attached algal biomass; restore high/good macrophyte status; maintain appropriate water and sediment pH, alkalinity and cation concentrations; maintain/restore appropriate water colour; maintain/restore appropriate organic carbon levels; maintain/restore appropriate turbidity; maintain the area and condition of fringing habitats.</p>				
<p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-</p>	<p>Stable/ increasing habitat area; no decline in habitat distribution; at least 7 positive indicator species present in monitoring</p>	<p>No The closest example of this terrestrial habitat occurs c. 5km east of the</p>	-	-	Yes

Brometalia) (* important orchid sites) [6210]	stop; negative indicator species not more than 20% cover collectively; cover of non-native species not more than 1%; cover of woody species not more than 5%; broadleaf herb component between 40 – 90%; at least 30% of sward between 5 – 40cm tall; litter cover not more than 25%; bare soil not more than 10%; area of habitat showing signs of serious grazing or disturbance less than 20 sq m.	bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.			
Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]	Stable/ increasing habitat area and woodland size; no decline in habitat distribution; diverse woodland structure with a relatively closed canopy; maintain diversity and extent of community types; seedlings, saplings and pole age-classes in adequate proportions to ensure woodland canopy survival; at least 19 stems/ha of dead wood of at least 20cm dia.; no decline in veteran trees or indicators of local distinctiveness; all four indicators of overgrazing absent; no decline in	No The closest example of this terrestrial habitat occurs c. 6km east of the bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.	-	-	Yes

	native tree cover, not less than 90%; variety of typical native species present; negative indicator species cover not greater than 10% with regeneration of these species absent.				
Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	Stable/ increasing habitat area and woodland size; no decline in habitat distribution; diverse woodland structure; maintain diversity and extent of community types; seedlings, saplings and pole age-classes in adequate proportions to ensure woodland canopy survival; appropriate hydrological regime for maintenance of alluvial vegetation; at least 19 stems/ha of dead wood of at least 20cm dia.; no decline in veteran trees or indicators of local distinctiveness; all five indicators of overgrazing absent; no decline in native tree cover, not less than 90%; variety of typical native species present; negative indicator species cover not greater than 10% with	No Periodic flooding of the habitat is essential to maintain the alluvial woodlands along the river and lake floodplains. The closest example of this habitat occurs c. 1.3km east of the bridge (i.e. upstream). There are no records of this habitat downstream of the bridge. There is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.	-	-	Yes

	regeneration of these species absent.				
Sea Lamprey Petromyzon marinus [1095]	>75% of main stem length of rivers accessible from estuary; annual run size should reflect that expected under near-natural conditions; larval lamprey present in SAC catchment; no decline in extent and distribution of spawning and nursery beds.	Yes Potential for direct effects on these species due to in-stream works. Species are sensitive to disturbance and water quality impacts which may arise, particularly during construction. As such, there is a complete source-pathway-receptor chain for impacts from the proposed works to these QIs. - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from equipment and machinery.	- <u>Loss of QI Supporting Habitat (Riverbed)</u> * An electric 1.5 tonne mini digger will be the only machinery permitted within the dry working area. * The suitable lamprey and salmonid nursery habitat downstream of the bridge on the south side (near the LHB) will be entirely marked out. There will be no machinery or personnel permitted within this area. * Existing riverbed material upstream will be re-spread over the areas damaged by scour and finished to natural riverbed levels. * Ecological Clerk of Works (ECoW) will be present for all works taking place upstream of the bridge, in areas identified as providing suitable spawning habitat. * Once the dry working area has been established, the ECoW will be responsible for making out the area of suitable nursery	No in-combination effects: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted.	Yes Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.
Brook Lamprey Lampetra planeri [1096]	Access to all watercourses down to first order streams; not less than 50% of sample sites with suitable habitat positive for larval brook/river lamprey; at least three age/size groups present; mean density of larval lamprey in sites with suitable habitat of at least 5/m ² ; no decline in extent and distribution of spawning and nesting beds.	- Potential introduction or spread of non-native invasive species. - Potential for riverbed scour repairs to result in a barrier to migration.			
Lampetra fluviatilis (River Lamprey) [1099]	Access to all watercourses down to first order streams; not less than 50% of sample sites with suitable habitat positive for larval brook/river lamprey; at least three age/size				

	<p>groups present; mean density of larval lamprey in sites with suitable habitat of at least 5/m²; no decline in extent and distribution of spawning and nesting beds.</p>	<p>- Potential for direct loss of spawning habitat within the Garavogue River.</p>	<p>habitat in the south (RHB) downstream of the bridge.</p> <p>* ECoW will ensure that all machinery and personnel do not enter this area at any stage during the construction phase.</p> <p>- <u>Barrier to Migration</u></p> <p>* The dry working area required for the in-stream works will only span half of the width of the river at any given time. The river will be left to flow through the remaining half of the river.</p> <p>* Riverbed scour repairs upstream of the bridge will involve re-spreading accumulated materials on the riverbed where scour damage has occurred.</p> <p>* Finished river level will not change from the existing levels.</p> <p>* Following completion of the construction phase, all materials remaining within the dry working area and all bunding materials (i.e. sandbags and plastic membranes) will be removed from the river. No materials shall be left within</p>		
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			<p>the river when the dry working area is rewet.</p> <ul style="list-style-type: none"> - <u>Disturbance/Mortality of QI Species During In-stream Works (as above)</u> - <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u> 		
Salmon <i>Salmo salar</i> [1106]	100% of river channels down to 2 nd order accessible from estuary; conservation limit for each system consistently exceeded; maintain or exceed 0+ fry mean catchment-wide abundance threshold value- currently set at 17 salmon fry/5 minutes sampling; no significant decline in out-migrating smolt abundance; no decline in no. & distribution of spawning redds due to anthropogenic causes; and water quality at least Q4 at all sampled sites.	<p>Yes</p> <p>Potential for direct effects on this species due to in-stream works which could result in mortality. Species is sensitive to disturbance and water quality impacts which may arise, particularly during construction. As such, there is a complete source-pathway-receptor chain for impacts from the proposed works to this QI.</p> <ul style="list-style-type: none"> - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from 	<ul style="list-style-type: none"> - <u>Loss of QI Supporting Habitat (Riverbed) (as above)</u> - <u>Barrier to Migration (as above)</u> - <u>Disturbance/Mortality of QI Species During In-stream Works (as above)</u> - <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u> 	<p>No in-combination effects:</p> <ul style="list-style-type: none"> - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for 	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>

		<p>equipment and machinery.</p> <ul style="list-style-type: none"> - Potential introduction or spread of non-native invasive species. - Potential for riverbed scour repairs to result in a barrier to migration. - Potential for direct loss of spawning habitat within the Garavogue River. 		<p>in-combination effects is predicted.</p>	
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Overall Conclusion: Integrity Test

The applicant determined that following the implementation of mitigation, the construction and operation of the proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for the Lough Gill SAC and that no effects of any significance will occur.

The proposed bridge repair and refurbishment works are located within the Lough Gill SAC with a hydrological connection via the Garavogue River over which the bridge crosses. In-stream works are required to establish dry working areas within the watercourse, following which the works on the riverbed will take place in dry conditions with only half of the width of the river utilised at any one time. Conservation Objective targets for the qualifying interest habitats and species could be undermined through reduction in water quality; habitat alteration or loss; direct disturbance or displacement; introduction of barriers to migration; and spread of invasive species during the construction phase alone or in combination with other plans and projects.

No habitat loss within the European Site will occur and adverse effects from water contamination, spread of invasive species and disturbance can be effectively prevented by mitigation measures ensuring the protection of the watercourse. These mitigation measures will include: the appointment of a Project Ecologist; strict water pollution controls; biosecurity protocols; timing works to avoid sensitive periods for aquatic fauna; pre-construction surveys for new otter holts; noise and lighting controls to minimise disturbance; and measure to address the risk of pollution incidents.

Based on the information submitted, surveys carried out and analysis provided, I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the Lough Gill SAC and adverse effects on site integrity can be excluded.

Table 4: Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627)

Key Issues:

- Loss of, or disturbance to habitats or species
- Potential impairment of water quality
- Introduction of invasive species

Conservation Objectives: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000627.pdf

Summary of Appropriate Assessment

Conservation Objective: To <u>maintain</u> the favourable conservation condition of the following:	Targets & Attributes (as relevant)	Potential adverse effects?	All Mitigation Measures	In-combination effects	Can adverse effects on site integrity be excluded?
Estuaries [1130]	Stable/ increasing habitat area; maintain the extent of the Zostera-dominated community and the Mytilidae-dominated community complex; conserve the high quality of the Zostera-dominated community; conserve the high quality of the Mytilidae-dominated community; conserve certain specified community types in a natural condition.	<p>Yes</p> <p>Works site is c. 0.25km upstream of the SAC. In-stream works and other works associated with the bridge rehabilitation project give rise to a potential source-pathway-receptor chain for impacts during the construction phase.</p> <p>- Risk of impacts to water quality given the nature of the proposed works and the use of heavy</p>	<p>- <u>Water Quality (as above)</u></p> <p>- <u>Biosecurity Protocols (as above)</u></p>	<p>No in-combination effects:</p> <p>- Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species.</p> <p>- Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is</p>	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>

		<p>machinery and plant in proximity to the river.</p> <ul style="list-style-type: none"> - Potential for the accidental release of polluting matter from equipment and machinery. - No potential for operational stage impacts. 		<p>related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted.</p>	
<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p>	<p>Stable/ increasing habitat area; maintain the extent of the Zostera-dominated community and the Mytilidae-dominated community complex; conserve the high quality of the Zostera-dominated community; conserve the high quality of the Mytilidae-dominated community; conserve certain specified community types in a natural condition.</p>	<p>Yes</p> <p>Works site is c. 0.25km upstream of the SAC. In-stream works and other works associated with the bridge rehabilitation project give rise to a potential source-pathway-receptor chain for impacts during the construction phase.</p> <ul style="list-style-type: none"> - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from equipment and machinery. 	<ul style="list-style-type: none"> - <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u> 	<p>No in-combination effects:</p> <ul style="list-style-type: none"> - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as 	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>

		- No potential for operational stage impacts.		required, no potential for in-combination effects is predicted.	
Embryonic shifting dunes [2110]	Stable/ increasing habitat area; no decline in habitat distribution; maintain the natural circulation of sediment and organic matter without physical obstructions; maintain the range of coastal habitats including transitional zones; more than 95% of sand couch and/or lyme grass should be healthy; maintain the presence of species-poor communities with typical species; negative indicator species (including non-native species) less than 5% cover.	No The closest example of this terrestrial habitat occurs c. 8.5km overland from the bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.	-	-	Yes
Petrifying springs with tufa formation (Cratoneurion) [7220]	Stable/ increasing habitat area; no decline in habitat distribution; maintain appropriate hydrological regimes; maintain oligotrophic and calcareous conditions; maintain typical vegetation species.	No This terrestrial habitat is located along a seepage line in low sea cliffs near Ballincar c. 4.3km overland from the bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the	-	-	Yes

		proposed works to this qualifying interest.			
River Lamprey <i>Lampetra fluviatilis</i> [1099]	No barriers for migratory life stages of lamprey moving from freshwater to marine habitats and vice versa	<p>Yes</p> <p>Migrating adult lamprey pass through the SAC en route to/from the Garavogue River with the potential that this species may migrate upstream along the river towards the proposed in-stream works area.</p> <p>Potential for direct effects on this species due to in-stream works. Species is sensitive to disturbance and water quality impacts which may arise, particularly during construction. As such, there is a complete source-pathway-receptor chain for impacts from the proposed works to this QI.</p> <ul style="list-style-type: none"> - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from 	<ul style="list-style-type: none"> - <u>Loss of QI Supporting Habitat (Riverbed) (as above)</u> - <u>Barrier to Migration (as above)</u> - <u>Disturbance/Mortality of QI Species During In-stream Works (as above)</u> - <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u> 	<p>No in-combination effects:</p> <ul style="list-style-type: none"> - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted. 	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>

		<p>equipment and machinery.</p> <ul style="list-style-type: none"> - Potential introduction or spread of non-native invasive species. - Potential for riverbed scour repairs to result in a barrier to migration. - Potential for direct loss of spawning habitat within the Garavogue River (which is not within this SAC). 			
Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]	No decline in number of occupied sites; adults or sub-adult snails present in four of the grassland zones on the transect where optimal or sub-optimal habitat occurs; adult or sub-adult snails present in at least 6 other places at the site with a wide geographic spread; at least 75m of habitat along the transect is classed as optimal and 150m as sub-optimal; soils at time of sampling are damp and covered with a layer of humid thatch for more than 130m along the transect; 12-15ha of the site	<p>No</p> <p>The closest example of the supporting terrestrial habitat for this species occurs c. 8km west of the bridge. Given the lack of pathways to the supporting terrestrial habitat for this species, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.</p>	-	-	Yes

	optimal and a further 11-14ha sub-optimal.				
Phoca vitulina (Harbour Seal) [1365]	Species range should not be restricted by artificial barriers to site use; conserve identified breeding sites in a natural condition; conserve the moult haul-out sites in a natural condition; human activities should occur at levels that do not adversely affect the harbour seal population at the site.	<p>Yes</p> <p>Potential impacts on species, primarily via downstream water quality deterioration, i.e. there is a complete source-pathway-receptor chain for impacts from the proposed works to this QI.</p> <ul style="list-style-type: none"> - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from equipment and machinery. - Potential introduction or spread of invasive species affecting habitats on which the species is reliant. - No potential for operational stage impacts. 	<ul style="list-style-type: none"> - <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u> 	<p>No in-combination effects:</p> <ul style="list-style-type: none"> - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted. 	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>
To restore the favourable conservation	Targets & Attributes (as relevant)	Potential adverse effects?	All Mitigation Measures	In-combination effects	Can adverse effects on site integrity be excluded?

condition of the following:					
Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]	Increasing habitat area; no decline or change in habitat distribution; maintain the natural circulation of sediment and organic matter without physical obstructions; maintain the range of coastal habitats including transitional zones; more than 95% of marram grass and/or lymre-grass should be healthy; maintain the presence of species-poor communities with typical species; negative indicator species (including non-native species) less than 5% cover.	No The closest example of this terrestrial habitat occurs c. 8km overland from the bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.	-	-	Yes
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	Increasing habitat area; no decline or change in habitat distribution; maintain the natural circulation of sediment and organic matter without physical obstructions; maintain the range of coastal habitats including transitional zones; bare ground should not exceed 10% of fixed dune habitat; maintain structural variation within sward;	No The closest example of this terrestrial habitat occurs c. 7km overland from the bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.	-	-	Yes

	maintain range of sub-communities with typical species; negative indicator species (including non-native species) less than 5% cover; no more than 5% cover of scrub/trees.				
Juniperus communis formations on heaths or calcareous grasslands [5130]	Stable/ increasing habitat area; no decline in habitat distribution; juniper population size at least 50 plants per formation; well-developed formation structure with an open to closed cover up to or exceeding 0.45m in height; appropriate community diversity and extent; negative indicator species under control; at least 10% juniper plants bearing cones and are seedlings; mean percentage of each juniper plant dead less than 10%; variety of typical native species with a minimum of 10 species present.	No The closest example of this terrestrial habitat occurs c. 6.8km overland from the bridge. Given the lack of pathways to this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.	-	-	Yes
Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*)	Stable/ increasing habitat area; no decline in habitat distribution; at least 7 positive indicator species present in monitoring stop; negative indicator species not more than	No The closest example of this terrestrial habitat occurs c. 6km overland from the bridge. Given the lack of pathways to	-	-	Yes

important orchid sites) [6210]	20% cover collectively; cover of non-native species not more than 1%; cover of woody species not more than 5%; broadleaf herb component between 40 – 90%; at least 30% of sward between 5 – 40cm tall; litter cover not more than 25%; bare soil not more than 10%; area of habitat showing signs of serious grazing or disturbance less than 20 sq m.	this terrestrial habitat, there is no source-pathway receptor chain for impacts from the proposed works to this qualifying interest.			
Sea Lamprey Petromyzon marinus [1095]	No barriers for migratory life stages of lamprey moving from freshwater to marine habitats and vice versa	<p>Yes</p> <p>Migrating adult lamprey pass through the SAC en route to/from the Garavogue River with the potential that this species may migrate upstream along the river towards the proposed in-stream works area.</p> <p>Potential for direct effects on this species due to in-stream works. Species is sensitive to disturbance and water quality impacts which may arise, particularly during construction. As such, there is a complete source-pathway-receptor</p>	<ul style="list-style-type: none"> - <u>Loss of QI Supporting Habitat (Riverbed) (as above)</u> - <u>Barrier to Migration (as above)</u> - <u>Disturbance/Mortality of QI Species During In-stream Works (as above)</u> - <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u> 	<p>No in-combination effects:</p> <ul style="list-style-type: none"> - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for 	<p>Yes</p> <p>Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.</p>

		<p>chain for impacts from the proposed works to this QI.</p> <ul style="list-style-type: none"> - Risk of impacts to water quality given the nature of the proposed works and the use of heavy machinery and plant in proximity to the river. - Potential for the accidental release of polluting matter from equipment and machinery. - Potential introduction or spread of non-native invasive species. - Potential for riverbed scour repairs to result in a barrier to migration. - Potential for direct loss of spawning habitat within the Garavogue River (which is not within this SAC). 		<p>other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted.</p>	
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Overall Conclusion: Integrity Test

The applicant determined that following the implementation of mitigation, the construction and operation of the proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and that no effects of any significance will occur.

The proposed bridge repair and refurbishment works are located c. 0.25km upstream of the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC with a hydrological connection via the Garavogue River over which the bridge crosses. In-stream works are required to establish dry working areas within the watercourse, following which the works on the riverbed will take place in dry conditions with only half of the width of the river utilised at any one time. Conservation Objective targets for the qualifying interest habitats and species could be undermined through reduction in water quality; habitat alteration or loss; direct disturbance or displacement; introduction of barriers to migration; and spread of invasive species during the construction phase alone or in combination with other plans and projects.

No habitat loss within the European Site will occur and adverse effects from water contamination, spread of invasive species and disturbance can be effectively prevented by mitigation measures ensuring the protection of the watercourse. These mitigation measures will include: the appointment of a Project Ecologist; strict water pollution controls; biosecurity protocols; timing works to avoid sensitive periods for aquatic fauna; and measure to address the risk of pollution incidents.

Based on the information submitted, surveys carried out and analysis provided, I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and adverse effects on site integrity can be excluded.

Table 5: Cummeen Strand SPA (Site Code: 004035).

Key Issues:

- Loss of, or disturbance to species or supporting habitat
- Potential impairment of water quality
- Introduction of invasive species

Conservation Objectives: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004035.pdf

Summary of Appropriate Assessment

Conservation Objective: To <u>maintain</u> the favourable conservation condition of the following:	Targets & Attributes (as relevant)	Potential adverse effects?	All Mitigation Measures	In-combination effects	Can adverse effects on site integrity be excluded?
Light-bellied Brent Goose (Branta bernicla hrota) [A046]	Stable/ increasing long term population trend; No significant decrease in the range, timing and intensity of use of areas other than that occurring from natural patterns of variation.	Yes Due to hydrological connectivity, the proposed works have the potential to adversely affect the conservation status of these bird species primarily through degradation in water quality and resultant impacts on supporting habitats.	- <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u>	No in-combination effects: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-	Yes Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.
Oystercatcher (Haematopus ostralegus) [A130]	Stable/ increasing long term population trend; No significant decrease in the range, timing and intensity of use of areas other than that occurring				

	from natural patterns of variation.	Potential for spread of invasive species to impact on supporting habitats.		combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply mitigation measures, as required, no potential for in-combination effects is predicted.	
Redshank (Tringa totanus) [A162]	Stable/ increasing long term population trend; No significant decrease in the range, timing and intensity of use of areas other than that occurring from natural patterns of variation.				
Wetland and Waterbirds [A999]	The permanent area of wetland habitat should be stable and not significantly less than 1732 ha, other than that occurring from natural patterns of variation.	Yes Potential for downstream water quality impacts as a result of the scour repairs and de-vegetation works which may result in siltation of the watercourse, loss of pollutive materials during the scour repair works on the abutments and the riverbed, potential hydrocarbon spills or introduction of invasive species. These could impact the wetlands supporting the QI species.	- <u>Water Quality (as above)</u> - <u>Biosecurity Protocols (as above)</u>	No in-combination effects: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites, water quality and protected species. - Varying nature and scale of small-scale developments within proximity to bridge. The main potential for in-combination effect is related to construction stage pollution events. In light of the proposed mitigation measures and the requirement for other projects to undergo AA and apply	Yes Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European site will occur.

				mitigation measures, as required, no potential for in-combination effects is predicted.	
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Overall Conclusion: Integrity Test

The applicant determined that following the implementation of mitigation, the construction and operation of the proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for the Cummeen Strand SPA and that no effects of any significance will occur.

The proposed bridge repair and refurbishment works are located c. 0.7km upstream of the Cummeen Strand SPA with a hydrological connection via the Garavogue River over which the bridge crosses. In-stream works are required to establish dry working areas within the watercourse, following which the works on the riverbed will take place in dry conditions with only half of the width of the river utilised at any one time. Conservation Objective targets for the qualifying interest habitats and species could be undermined through reduction in water quality; habitat alteration or loss; or spread of invasive species during the construction phase alone or in combination with other plans and projects.

No habitat loss within the European Site will occur and adverse effects from water contamination, spread of invasive species can be effectively prevented by mitigation measures ensuring the protection of the watercourse. These mitigation measures will include: the appointment of a Project Ecologist; strict water pollution controls; biosecurity protocols; timing works to avoid sensitive periods for aquatic fauna; and measure to address the risk of pollution incidents.

Based on the information submitted, surveys carried out analysis provided, I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the Cummeen Strand SPA and adverse effects on site integrity can be excluded.

8.4.45. Appropriate Assessment Conclusions

8.4.46. Having carried out screening for Appropriate Assessment of the proposed repair and refurbishment works to Markievicz Bridge in Sligo Town, it was concluded that the works may result in significant effects on the Lough Gill SAC (Site Code: 001976), Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627) and/or Cummeen Strand SPA (Site Code: 004035). Consequently, an Appropriate Assessment was required of the implications of the project on the qualifying features of these sites in light of their Conservation Objectives.

8.4.47. Following an Appropriate Assessment, it has been ascertained that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of these European sites, or any other European site, in view of the sites' Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.

8.4.48. This conclusion is based on:

- A full and detailed assessment of all aspects of the proposed project including proposed mitigation measures and ecological monitoring in relation to the Conservation Objectives of the Lough Gill SAC (Site Code: 001976), Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627) and Cummeen Strand SPA (Site Code: 004035).
- Detailed assessment of all aspects of the proposed development that could result in significant effects on the European Sites within a zone of influence of the proposed scheme.
- Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.
- Detailed assessment of in-combination effects with other plans and projects including historical projects, current proposals and future plans.
- No reasonable scientific doubt as to the absence of adverse effects on the integrity of Lough Gill SAC, Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and Cummeen Strand SPA.

9.0 Recommendation

- 9.1. On the basis of the above assessment, I recommend that the Commission approve the proposed development subject to the reasons and considerations below and subject to conditions including requiring compliance with the submitted details and with the mitigation measures as set out in the NIS.

Reasons and Considerations

In coming to its decision, the Commission had regard to the following:

- (a) EU Habitats Directive (92/43/EEC),
- (b) European Union (Birds and Natural Habitats) Regulations 2011-2015,
- (c) the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on a European Site,
- (d) the conservation objectives, qualifying interests and special conservation interests for the Lough Gill SAC (Site Code: 001976), the Cummeen Strand / Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627) and the Cummeen Strand SPA (Site Code: 004035),
- (e) the policies and objectives of the Sligo County Development Plan 2024-2030,
- (f) the nature and extent of the proposed works as set out in the application for approval,
- (g) the information submitted in relation to the potential impacts on habitats, flora and fauna, including the Natura Impact Statement,
- (h) the submissions received in relation to the proposed development, and
- (i) the report and recommendation of the person appointed by the Commission to make a report and recommendation on the matter.

Appropriate Assessment

The Commission agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the Lough Gill SAC (Site Code:

001976), the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627), and the Cummeen Strand SPA (Site Code: 004035), are the only European Sites in respect of which the proposed development has the potential to have a significant effect.

The Commission considered the Natura Impact Statement and associated documentation submitted with the application for approval, the mitigation measures contained therein, the submissions and observations on file, and the Inspector's assessment.

The Commission completed an Appropriate Assessment of the implications of the proposed development for the affected European Sites, namely the Lough Gill SAC (Site Code: 001976), the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627), and the Cummeen Strand SPA (Site Code: 004035) in view of the sites' conservation objectives. The Commission considered that the information before it was adequate to allow the carrying out of an Appropriate Assessment. In completing the Appropriate Assessment, the Commission considered, in particular, the following:

- i. the likely direct and indirect impacts arising from the proposed development both individually or in combination with other plans or projects,
- ii. the mitigation measures which are included as part of the current proposal, and
- iii. the conservation objectives for the European Sites.

In completing the Appropriate Assessment, the Commission accepted and adopted the Appropriate Assessment carried out in the Inspector's report in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the sites' conservation objectives.

In overall conclusion, the Commission was satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the sites' conservation objectives.

Proper Planning and Sustainable Development/Likely effects on the environment

It is considered that, subject to compliance with the conditions set out below, the proposed development would not have significant negative effects on the environment or the community in the vicinity, would not give rise to a risk of pollution, would not be detrimental to the visual or landscape amenities of the area, would not seriously injure the amenities of property in the vicinity, would not adversely impact on the cultural, archaeological and built heritage of the area, would not interfere with the existing land uses in the area and would not interfere with traffic and pedestrian safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where any mitigation measures set out in the Natura Impact Statement or any conditions of approval require further details to be prepared by or on behalf of the local authority, these details shall be placed on the file and retained as part of the public record.

Reason: In the interest of clarity and the proper planning and sustainable development of the area and to ensure the protection of the environment.

2. The mitigation and monitoring measures identified in the Natura Impact Statement submitted with the application shall be implemented in full. Prior to the commencement of development, details of a time schedule for implementation of mitigation measures and associated monitoring shall be prepared by the local authority and placed on file and retained as part of the public record.

Reason: In the interest of protecting the environment, the protection of European Sites and in the interest of public health.

3. A suitably qualified ecologist shall be retained by the local authority to oversee the site set up and construction of the proposed development and implementation of mitigation measures relating to ecology. The ecologist

shall be present during the works. Upon completion of works, an ecological report of the site works shall be prepared by the appointed ecologist to be kept on file as part of the public record.

Reason: In the interest of nature conservation and biodiversity.

4. Prior to the commencement of development, the local authority, or any agent acting on its behalf, shall prepare in consultation with the project ecologist and relevant statutory agencies, a Construction Environmental Management Plan (CEMP), incorporating all mitigation measures indicated in the Natura Impact Statement and Ecological Impact Assessment and demonstration of proposals to adhere to best practice and protocols. The CEMP shall include:
 - (a) all mitigation measures indicated in the Natura Impact Statement and Ecological Impact Assessment;
 - (b) location and extent of silt fencing and other silt management measures to be installed on site;
 - (c) specific proposals as to how the measures outlined in the CEMP will be measured and monitored for effectiveness; and
 - (d) a Traffic Management Plan for the construction phase.

Reason: In the interest of protecting the environment and European Sites.

5. The following nature conservation requirements shall be complied with:
 - (a) Prior to the commencement of development, details of measures to protect fisheries and water quality of the river system shall be outlined and placed on file. Full regard shall be had to Inland Fisheries Ireland's published guidelines for construction works near waterways (Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters, 2016). A programme of water quality monitoring shall be prepared in consultation with the contractor, the local authority and relevant statutory agencies and the programme shall be implemented thereafter;

- (b) no in-stream works shall take place outside the period of the 1st day of July to the 30th day of September, inclusive, without the written approval of the Ecological Clerk of Works. Such approval shall be placed on the public file;
- (c) a pre-construction otter survey by a suitability qualified ecologist shall be carried out before works commence;
- (d) a pre-construction bat survey shall be carried out by a suitably qualified ecologist during the active bat season, and any destruction of bat roosting sites or relocation of bat species shall be carried out by a suitably qualified ecologist under a Derogation Licence granted by the Minister of Housing, Local Government and Heritage.

Reason: In the interests of biodiversity and nature conservation.

6. All mitigation measures in relation to archaeology and cultural heritage as set out in the Underwater Archaeological Impact Assessment submitted with the application shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this permission. The National Monuments Service shall be furnished with a final archaeological report describing the results of any archaeological investigative work/ excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation either in situ or by record of sites, features or other objects of archaeological interest.

7. The local authority and any agent acting on its behalf shall ensure that all plant and machinery used during the works should be thoroughly cleaned and washed before delivery to the site to prevent the spread of hazardous invasive species and pathogens.

Reason: In the interest of the proper planning and sustainable development of the area and to ensure the protection of the European sites.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

Niall Haverty
Senior Planning Inspector

11th March 2026

Form 1 - EIA Pre-Screening

Case Reference	ACP-323461-25
Proposed Development Summary	Proposed repair and refurbishment of Markievicz Bridge
Development Address	Bridge Street, Sligo, County Sligo
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?	
<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.	
<input type="checkbox"/> No, No further action required.	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1.	
EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994.	
No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold.	
EIA is Mandatory. No Screening Required	
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.	
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____

Date: _____