



Appendix D: Revised Natura Impact Statement

Dunstown Solar Farm

17/04/2026



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EXECUTIVE SUMMARY

- 1.1. A Stage 2 Natura Impact Statement (NIS) has been undertaken for a proposed solar farm (the “Proposed Development”) within the townlands of Flemingtown South (Tonaphuca), Donode Big, Sillagh and Swordlestown South, Naas, Co. Kildare (the “Application Site”).
- 1.2. This is to assess the impacts of the proposal on the integrity of Natura 2000 sites within 15km, considering the conservation objectives of the sites and their ecological structure and function.
- 1.3. In response to the Further Information request issued by An Coimisiún Pleanála on 18th July 2025, this Natura Impact Statement has been updated in order to address items specifically relating to ecology, namely:
 - Point 4 – Ornithology (Revised Ecological Appraisal and NIS);
 - Point 7- Protected Species (NIS, Revised Ecological Appraisal); and
- 1.4. Within the 15km zone of influence (ZOI) surrounding the Proposed Development Site there are seven Natura 2000 Designated Sites. There are five Special Areas of Conservation (“SACs”), Wicklow Mountains SAC, Red Bog, Kildare SAC, Pollardstown Fen SAC, Mouds Bog SAC, Ballynafagh Lake SAC. There are two Special Protection Areas (“SPAs”); Poulaphouca Reservoir SPA and Wicklow Mountains SPA.
- 1.5. It has been concluded that there is potential ecological connectivity between the Proposed Development Site and the Wicklow Mountains SAC and potential ornithological connectivity between the Proposed Development Site and Poulaphouca Reservoir SPA. Further surveys to assess this potential connectivity have been undertaken to provide further context for this assessment.
- 1.6. As no connectivity (pathway for impacts) exists between the Proposed Development Site and the remaining Natura 2000 designated sites within the study area, these have been ‘scoped out’ from further assessment.
- 1.7. With the implementation of integral design measures, mitigation and best practice construction methods, it can be concluded that there will be **no adverse effects on site integrity** for all Natura 2000 designated sites within the identified ZOI.

INTRODUCTION

Background

- 1.8. Neo Environmental has been appointed on behalf of Everay Energy Ltd. (the “Applicant”) to undertake a Natura Impact Statement (“NIS”) for a proposed solar farm development (the “Proposed Development”) within the townlands of Flemingtown South (Tonaphuca), Donode Big, Sillagh and Swordlestown South, Naas, Co. Kildare (the “Application Site”).
- 1.9. Please see the accompanying Indicative Infrastructure Layout Drawings (Appendix J) which illustrate the Proposed Development layout.
- 1.10. In response to the Further Information request issued by An Coimisiún Pleanála on 18th July 2025, this Natura Impact Statement has been updated in order to address items specifically relating to ecology, namely:
- Point 4 – Ornithology (Revised Ecological Appraisal and NIS);
 - Point 7- Protected Species (NIS, Revised Ecological Appraisal).
- 1.11. An Ecological Appraisal (EA)¹ and Biodiversity Management Plan (BMP)² have also been undertaken for the Proposed Development and should be read in conjunction with this NIS.

Development Description

- 1.12. The Proposed Solar Farm will consist of the construction of PV panels mounted on metal frames, new access tracks, underground cabling, perimeter fencing with CCTV cameras and access gates, temporary construction compounds and all ancillary grid infrastructure and associated works.
- 1.13. The Proposed Development will also involve the temporary use of an access road linking the site with the R411 Road to the east.

Site Description

- 1.14. The area of the Proposed Development (the “Application Site”) lies in a rural setting at an elevation of approximately 124 – 144m AOD and covers a total area of c. 128.66 hectares. It is centred at approximate Irish National Grid Reference (ITM) X 690414 Y 713015 and is located c.210m west of the R411 at its closest point with one of the access points coming off

¹ Dunlop, D. (2025). Ecological Appraisal. Dunstown Solar Farm. Neo-Environmental.

² Dunlop, D. (2025) Biodiversity Management Plan. Dunstown Solar Farm. Neo-Environmental.

this regional road. At its closest point, the nearest town of Naas is situated c. 3.88km north of the site.

- 1.15. The site initially comprised of 32 fields which were surveyed however since then fields 25 and 26 have been removed from the boundary due to constraints highlighted from the site walkover. The fields comprise of agricultural land and the site is currently being used for pastoral farming. The field system is bound by a mixture of mature trees, hedgerows and post-and-wire fencing with a large area of forestry directly adjacent to the boundary within the central area of the site, and another area of forestry directly adjacent to the northern boundary. Access will be gained from two existing entrances; one is off the R411 to the northeast of the site and the second entrance is off the L6045 to the west of the site.
- 1.16. The overall landscape comprises of agricultural lands with areas of mixed-scale field systems. The wider landscape consists of well-established presence of mature tree-lined field boundaries, pockets of woodland and mature treelined roadside vegetation. The river Liffey lies c. 1.78km southwest of the Proposed Development at its nearest point. Two quarries are situated c. 1.56km northeast and c. 4.44km west, respectively.

ADOPTED DESIGN PRINCIPLES

- 1.17. Measures incorporated into the Proposed Development design include the following:
- A 5m buffer from hedgerows
 - 2m / 5m buffers from field drains
 - Tree buffers dependant on height
 - Floating Access Tracks
 - Badger Setts 30m
 - Overhead Line buffers 10m
 - Flood Modelling
 - Up to 0.6m – Panels Only
 - 0.6m to 1.1m – Panels are to be raised
 - Archaeology Buffers – Taken 10m from anomalies on Geophysics
 - Woodland Buffers – 10m
 - Areas were avoided due to the following:

- Marsh
- Existing Farm Houses & Receptors

Statement of Authority

- 1.18. The assessment has been managed by Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM), (Dara Dunlop). All work has been carried out in line with the relevant professional guidance; CIEEM's Guidelines for Report Writing³ and the Environment, Heritage and Local Government's Guidance on Appropriate Assessments⁴.
- 1.19. Louis Maloney, who reviewed this report, has five and a half years of professional ecological experience. This includes terrestrial and marine surveys covering a wide range of fauna and flora such as bird (2 years of surveying), mammal and vegetative surveys. In addition, Louis has been involved in the management of large variety of projects involving: Environmental Impact Assessment ("EIA"), Natura Impact Statement ("NIS"), Ecological Impact Assessment ("EcIA"), Biodiversity Management Plan ("BMP") and Net Gain Assessment ("NGA") reports. He holds a BSc in Marine Science from the National University of Ireland, and an MSc in Conservation Behaviour – Marine and Terrestrial Science. Louis is in the process of applying for a Full level membership with CIEEM.
- 1.20. Dara Dunlop BSc (Hons) is a Qualifying Member of CIEEM with circa 4 years' experience in the ecology sector, including working for an ecological consultancy, undertaking a range of protected species surveys and extended Phase 1 habitat surveys and Fossitt habitat surveys for industrial schemes. Dara has authored a number of reports including Ecological Impact Assessments, Appropriate Assessments and Protected Species Reports for various developments.
- 1.21. Laura Stenson is an Ecologist with 2 years professional experience in the ecology sector, which includes terrestrial and marine ecology. Laura holds a BSc in Earth and Ocean sciences and in the process of applying for membership with CIEEM. Laura has experience in the completion of bird surveys, habitat surveys and ecological report writing having authored and co-authored a number of reports including Ecological Appraisals and Natura Impact Statements.

³ CIEEM, (2017). Guidelines for Report Writing. Available at www.cieem.net

⁴ Environment, Heritage and Local Government, 2009. Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities. Available at www.npws.ie

LEGISLATION

Requirement for Appropriate Assessment

- 1.22. The requirement for Appropriate Assessment of plans or projects originates from Article 6 (3) and (4) of European Union (EU) Habitats Directive. This is implemented in Ireland through the European Communities (Natural Habitats) Regulations of 1997, and the European Communities (Birds and Natural Habitats) Regulations 2011 – 2015 (as amended). In particular, in relation to the planning consent process, in Part XAB of the Planning and Development Act 2000 – 2015 (as amended) where Section 177U sets out the requirements for Screening for AA.
- 1.23. The wording of Article 6 (3) of the Directive is as follows:
- “Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*
- 1.24. As outlined in the European Commission document ‘Assessment of plans and projects significantly affecting Natura 2000 sites’⁵, any project that is not directly connected with or necessary to the management of a Natura 2000 site, but likely to have a significant effect upon it, either individually or cumulatively will be subject to Appropriate Assessment. Furthermore, the European Commission’s most recent guidance on Article 6: “Managing Natura 2000 sites: The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC”⁶ has also been considered.
- 1.25. Where significant effects are uncertain or unknown at the screening stage an AA will be required, due to the need to apply the precautionary principle. Conversely, if a project will have impacts on a site, but these impacts will clearly not affect or undermine those conservation objectives, it is not considered that it will have a significant effect on the site concerned.
- 1.26. The aim of Stage 2, ‘Natura Impact Statement’ is to inform the assessment of the impacts of the Proposed Development on the integrity of the Natura 2000 site, considering the conservation objectives of the site and its ecological structure and function. This is done by

⁵ European Commission (2021) *Assessment of plans and projects in relation to Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats directive 92/43/EEC*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021XC1028%2802%29>

⁶ Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat’s Directive 92/43/EEC (European Commission, 2018)

considering the type of development and the conservation objectives of any Natura 2000 sites which may be impacted. The NIS will assess connectivity between the development and the Natura 2000 sites and their qualifying interests.

- 1.27. In addition, s177(T)1(b) and (2) of the Planning and Development Act 2000 (as amended) sets out the requirements for an NIS and states:

“s177(T) (1)(b) A Natura impact statement means a statement, for the purposes of Article 6 of the Habitats Directive, of the implications of a Proposed Development, on its own or in combination with other plans or projects, for one or more than one F722 [European site], in view of the conservation objectives of the site or sites.

(2) Without prejudice to the generality of subsection (1), a Natura impact report or a Natura impact statement, as the case may be, shall include a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications for one or more than one F722 [European site] in view of the conservation objectives of the site or sites.”

Mitigation

- 1.28. The European Commission (EC 2001) states that mitigation should not be considered during the AA (i.e. Stage 1) Screening stage. On 12th April 2018, the Courts of Justice of the EU (CJEU) ruled in case C-323/17 (*People over Wind v Coillte*) that measures intended to avoid or reduce a proposed plan or project's harmful effects on a European site ('mitigation measures') cannot be considered during the Screening for AA stage.
- 1.29. Therefore, unless it can be shown that the proposed plan or project would not have a significant effect on the conservation objectives of the relevant European site in the absence of mitigation, it is necessary to carry out a Stage 2 AA. Mitigation measures should be considered at Stage 2, when a 'full and precise analysis' can be carried out. This is contrary to the previous guidance whereby inherent mitigation at the screening stage could be considered.

The Precautionary Principal

- 1.30. The Precautionary Principle, is referenced in Article 191 of the Treaty on the Functioning of the EU, is defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as:

When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis.

- 1.31. The reasoned employment of the 'Precautionary Principle' is fundamental to every AA.

ASSESSMENT METHODOLOGY

Stages of Appropriate Assessment

- 1.32. The AA process comprises of four stages in order to identify whether proposals have the potential to significantly impact upon Natura 2000 designations. The stages are as follows:
- **Stage 1 Screening:** To determine the likelihood of significant impacts.
 - **Stage 2 Natura Impact Statement:** To assess the impact of proposals on the integrity of the Natura 2000 site, considering the conservation objectives of the site and its ecological structure and function.
 - **Stage 3 Assessment of alternatives:** Where significant impacts are anticipated despite mitigation measures, the proposal should progress to Stage 3 and consider alternatives or no longer proceed.
 - **Stage 4 Assessment where no alternative exists and where adverse impacts remain:** The final stage involves examining whether there are imperative reasons of overriding public interest for allowing the proposal to adversely impact upon a Natura 2000 site.

Source – Pathway - Receptor Model

- 1.33. The ‘source-pathway-receptor’ conceptual model is a tool used for environmental assessment. In order for an effect to occur, all elements of this model must be linked. The removal or absence of one of the elements of the model results in there being no likelihood for the effect in question to occur. For example:
- Source(s), e.g., blasting;
 - Pathway(s) e.g., vibration and noise; and,
 - Receptor(s) e.g., disturbance of nesting birds.
- 1.34. For an NIS, this model is focused solely on the selection features of Natura 2000 sites as defined by National Parks and Wildlife Services (NPWS), and referenced within this report.
- 1.35. The Proposed Development may have the potential to result in a number of impacts, which could potentially affect the selection features of Natura 2000 sites. The analysis of these effects, using scientific knowledge and professional judgement, leads to the identification of a “zone of influence” for each effect (i.e., the distance at which the impact of the Proposed

Development could have potential effects, using professional judgement and published guidance).

Study Zone Identification

1.36. The 'Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities'⁷ states that the NIS should include the following:

- *"Any Natura 2000 sites within or adjacent to the plan or project area.*
- *Any Natura 2000 sites within the likely zone of impact of the plan or project.*
- *A distance of 15km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et. al., 2006). For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects. In some instances, connectivity may go beyond 15k and will also need to be considered.*
- *Natura 2000 sites that are more than 15km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the case of sites with water dependent habitats or species, and a plan or project that could affect water quality or quantity, for example, it may be necessary to consider the full extent of the upstream and/or downstream catchment."*

1.37. It is considered that the ZOI for the Natura 2000 designated sites and their qualifying features will fall within a 15km radius of developments.

1.38. Sites further than 15km from the Proposed Development with a hydrological connection have been considered. These sites are not considered to fall with ZOI, for reasons outlined below.

Desk Study

1.39. Sources of material that were consulted as part of the desk study for the purposes of the assessment are as follows:

⁷ Department for Environment, Heritage and Local Government (2009) Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities. Available at:
http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf

- NPWS natural heritage database for Natura 2000 sites within the 15km ZOI of the Proposed Development Site⁸;
- NPWS site synopses, Natura 2000 Data Form and conservation objectives relating to each site and aerial images;
- Environmental Protection Agency (EPA) interactive maps⁹.

Impact Assessment Process

1.40. The assessment process involves:

- Identifying and characterising Natura 2000 sites identified within the 15km zone of influence surrounding the Proposed Development Site and their qualifying features and addressing whether any of these designated sites have any connectivity with the Proposed Development. If any site is found to have no connectivity, then these designated sites will be 'scoped out' or not considered further;
- Using the Source-Pathway-Receptor model, assess whether there will be any significant impacts to any of the Natura 2000 site, in regard to changes that result from the construction, operation and decommissioning phases of a project. Qualifying features of a Natura 2000 site that lie outside of the ZOI and not subject to any impacts from the Proposed Development then these will be 'scoped out' or not considered further;
- Identify any significant impacts on the integrity of the Natura 2000 site from the development and 'in combination' with any other development within 5km;
- Identify the need for the AA process to move to Stage 3: 'Assessment of alternatives' or, if there are no impacts from the development, the competent authority may allow the development to proceed, subject to other requirements being satisfied.

⁸ Environment, Heritage and Local Government (2009) Appropriate Assessment of Plan and Projects in Ireland. Available at: https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf

⁹ Available at: <https://gis.epa.ie/EPAMaps/>

STAGE 1: APPROPRIATE ASSESSMENT SCREENING

- 1.41. In accordance with NPWS guidance, this stage of the Appropriate Assessment has identified all Natura 2000 sites located within 15km of the Proposed Development Site and potential impacts associated with the Proposed Development have been identified.
- 1.42. Potential impacts can depend more on the nature of impacts, sensitivity of receptors and causal linkage, rather than actual distances. The assessment below considers connectivity, either ecological or hydrological, that may exist between the Proposed Development and the designated sites.

Identification of Natura 2000 Sites

- 1.43. There are five SACs and two SPAs within 15km of the Proposed Development Site. The designated features of each have been outlined within **Table 1-1** below. **Figure 1, Appendix A** of this report details the location of these sites in relation to the Proposed Development.

Table 1-1: Natura 2000 sites within 15km

Site Code	Site Name	Qualifying Features	Distance (km)	Potential Connectivity with the Proposed Development Site
SAC				
000397	Red Bog, Kildare SAC	Transition mires and quaking bogs [7140]	6.7km North-east	None
002331	Mouds Bog SAC	Active raised bogs [7110] Degraded raised bogs still capable of natural regeneration [7120] Depressions on peat substrates of the Rhynchosporion [7150]	10.3km North-west	None
002122	Wicklow Mountains SAC	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]	11.1km East-southeast	Ecological connectivity

		Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] <i>Lutra lutra</i> (Otter) [1355]		
000396	Pollardstown Fen SAC	Calcareous fens with <i>Cladium mariscus</i> and species of the Caricion davallianae [7210]	11.5km West-northwest	None

		Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] Alkaline fens [7230] <i>Vertigo geyeri</i> (Geyer's Whorl Snail) [1013] <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014] <i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016]		
001387	Ballynafagh Lake SAC	Alkaline fens [7230] <i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016] <i>Euphydryas aurinia</i> (Marsh Fritillary) [1065]	14.3km North-west	None
SPA				
004063	Poulaphouca Reservoir SPA	Greylag Goose (<i>Anser anser</i>) [A043] Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]	5.6km East-northeast	Ornithological connectivity
004040	Wicklow Mountains SPA	Merlin (<i>Falco columbarius</i>) [A098] Peregrine (<i>Falco peregrinus</i>) [A103]	11.1km East-southeast	None

- 1.44. As shown in **Table 1-1**, the Proposed Development Site is not located within or directly adjacent to any Natura 2000 site.
- 1.45. There is no suitable hydrological pathway connecting the Application Site to any Natura 2000 site. Drainage ditches within the site eventually connect to the Flennington-South river waterbody which drains into the Liffey River, eventually flowing into the Dublin Bay, across a distance of over 40km.
- 1.46. Red Bog, Kildare SAC and Mouds Bog SAC both support Annex I habitats and no mobile QI Annex II Species populations. There is therefore no pathway for likely significant effects to either of these SACs arising as a result of the Proposed Development.

- 1.47. Pollardstown Fen SAC supports Annex I habitats and Annex II species (three species of whorl snail). These species are restricted to fen habitats within the SAC boundary which lies over 11km from the Application Site. Ballynafagh Lake SAC also supports a population of Annex II marsh fritillary, as this SAC lies over 14km from the Application Site and given that there is no potential for suitable habitat for marsh fritillary on site, with devil's-bit scabious not recorded during site surveys, it is considered that there is no pathway for effects to this SAC.
- 1.48. On the basis of the above, it is considered that there is no potential for the Proposed Development to give rise to likely significant effects to the Red Bog, Kildare SAC, Mouds Bog SAC, Pollardstown Fen SAC or Ballynafagh Lake SAC.
- 1.49. It is considered that there is ecological connectivity between the Application Site and the Wicklow Mountain SAC. While no direct hydrological connectivity exists due to flow direction of the Liffey River, the Annex II QI species otter is a highly mobile species. As such it has the ability to commute from the SAC to the Application Site via the Poulaphouca Reservoir, Liffey River, Flennington South River and other watercourses within proximity to the Application Site. On this basis, it is considered that the Proposed Development, which will involve works in proximity to minor watercourses and within areas which may be utilised by migrating otters, has potential to give rise to likely significant effects upon otter populations of the Wicklow Mountain SAC.
- 1.50. The Poulaphouca Reservoir SPA is designated on account of the supported populations of wintering greylag goose and lesser black-backed gull. Connectivity of these populations to the Application Site has been assessed, based on the habitat preferences and core foraging ranges of the SCI species. It is considered that there is potential for ornithological connectivity between the Application Site and the SPA. As such, likely significant effects cannot be excluded in respect of this European site.
- 1.51. The Wicklow Mountains SPA's connectivity to the Application Site has been assessed. No ornithological connectivity exists due to the Application Site falling outside of Merlin and Peregrine's core foraging ranges¹⁰. Furthermore, no hydrological or other connectivity exists between the Application Site and this SPA. In addition to this, bird surveys undertaken of the site returned no sightings of these qualifying bird species within the Application Site.
- 1.52. This AA Screening Assessment has concluded that **there is potential for the Proposed Development to give rise to likely significant effects** on the Wicklow Mountains SAC and the Poulaphouca Reservoir SPA in the absence of further assessment or the application of mitigation. Therefore, Appropriate Assessment, is required to assess potential impacts on the integrity of these sites.

¹⁰ Haysom (2016). Assessing Connectivity with Special Protection Areas (SPAs) – Guidance, Version 3 – June 2016: <https://www.nature.scot/sites/default/files/2022-12/Assessing%20connectivity%20with%20special%20protection%20areas.pdf>

STAGE 2 NATURA IMPACT STATEMENT

Impact Assessment

- 1.54. Standard best practice pollution prevention measures will be adhered to throughout the construction, operational and decommissioning phases of the Proposed Development, which will reduce the potential for impacts on ecological receptors. As these are standard requirements, they are separate to mitigation measures which are outlined later in this report.
- 1.55. Relevant measures include but are not limited to:

Pollution Prevention

- Hydrocarbons, greases and hydraulic fluids will be stored in a secure compound area;
- All plant machinery will be properly serviced and maintained thereby reducing risk of spillage or leakage;
- All waste produced from construction will be collected in skips with the construction site kept tidy at all times;
- Excavated soil will be stored on site or removed by a licensed waste disposal unit;
- All materials and substances used for construction will be stored in a secure compound and all chemicals to be stored in secure containers to avoid potential contamination; and
- Location of spill kit to be known by all construction workers and implemented in the event of spillage or leakage.

Waste management

- Skips are to be used for site waste/debris at all times and collected regularly or when full;
- All hydrocarbons and fluids are to be collected in leak-proof containers and removed from site for disposal or recycling; and
- All waste from construction is to be stored within the site confines and removed to a permitted waste facility.

Environmental monitoring

- Contractor to nominate member of staff as the environmental officer with the responsibility to ensure best practice measures are implemented and adhered to, with any incidents or non-compliance issues being reported to the project team.

Assessment of Impacts

- 1.56. This section discusses and evaluates the likely impacts of the Proposed Development on the Wicklow Mountains SAC and the Poulaphouca Reservoir SPA which are the only Natura 2000 designated sites which were determined to have potential connectivity to the Application Site. As outlined previously the Application Site does not have connectivity with the remaining Natura 2000 designated sites within the study area and have therefore been ‘scoped out’ of this assessment.
- 1.57. Potential impacts for ecological features associated with a Natura 2000 designated site from the construction, operation and decommissioning of a solar farm may occur from the contamination of surface and/or ground waters. Those features (species) which are ecologically connected to a development site, and are mobile, may be impacted upon through disturbance as well as loss of habitat through loss of foraging or loafing habitat or through contamination of surface waters.
- 1.58. Aquatic systems and the species/habitats which are dependent on these systems are sensitive to pollution/contamination of surface waters. Pollution can result from any of the following entering a body of surface or groundwater:
- Poisonous, noxious or polluting matter;
 - Waste matter (including silt, cement, concrete, oil, petroleum spirit, chemicals, solvents, sewage and other polluting matter);
 - Other harmful activities detrimentally affecting the status of a waterbody.
- 1.59. The status of a waterbody can be affected not only by chemical pollution, but also by activities directly or indirectly affecting ecology, including changes in physio-chemical parameters such as temperature and turbidity or physical modification to the hydrology of a waterbody.
- 1.60. **Table 1-2** below details common water pollutants and their effect on the aquatic environment (Table extracted from Ciria guidance¹¹).

¹¹ Ciria (2015) Environmental good practice on site guide, fourth edition

Table 1-2: Common water pollutants and their effects on the aquatic environment

Common Water Pollutants	Adverse effect on aquatic environment
Silt	Reduces water quality, clogs fish gills, covers aquatic plants, impacts aquatic invertebrates, leads to a reduction in prey for species including otter and fish species, leads to degradation of habitat including that of juvenile freshwater pearl mussels
Bentonite (very fine silt)	Reduces water quality, clogs fish gills, covers aquatic plants, impacts aquatic invertebrates, leads to a reduction in prey for species including otter and fish species, leads to degradation of habitat including that of juvenile freshwater pearl mussels
Cement or concrete wash water (highly alkaline)	Changes the chemical balance, is toxic to fish and other wildlife. This can lead to direct impacts for aquatic species (including otter), or indirect through loss of prey resources
Detergent	Removed dissolved oxygen, can be toxic to fish and other wildlife present within the aquatic environment
Hydrocarbons (e.g. oil, diesel)	Suffocates aquatic life, damaging to the wildlife (e.g. birds), and to water supplies including industrial abstractions
Sewage	Reduces water quality, is toxic to aquatic wildlife including otter, and damages water supplies

- 1.61. An integral aspect of the Proposed Development design involves methods for controlling the movement of surface water within the Proposed Development Site. Movement of surface water will be managed by a Sustainable Drainage System (SuDS) following best practice guidelines on the use of SuDS¹².
- 1.62. The proposed drainage strategy (see **Technical Appendix 4: Flood Risk and Drainage Impact Assessment**¹³ for further details) proposes to construct multiple infiltration trenches /

¹² Ciria (2007) The SuDS Manual. Available at: <https://www.ciria.org/>

¹³ McGhee, M. *Technical Appendix 4: Flood Risk and Drainage Impact Assessment Dunstons Solar Farm*. Neo Environmental Ltd.

soakaway channels within the Application Site. The location of the soakaway channels have been chosen on the downward slope, near to the existing watercourses which run through the Application Site. The idea is to capture any overland flow in the SuDS device, prior to releasing into the natural surface water system.

- 1.63. Operations and activities that have the potential to impact on the water environment will be regularly monitored throughout the construction of the Proposed Development. This is to ensure compliance with planning conditions and environmental regulations. The Site Manager is responsible for ensuring that all monitoring is carried out according to the Environmental Monitoring Programme, summarised in **Table 1-3**.

Table 1-3: Environmental Monitoring

Environmental Aspect	Monitoring Location	Monitoring Frequency	Monitoring Arrangements
Site housekeeping	Entire site	Daily	Visual inspection
Surface water courses	All water courses	After periods of rain Weekly, if no rain	Visual inspection
Fuels and chemicals – appropriate storage	Entire site	Daily	Visual inspection

- 1.64. These records and results will be maintained by the Site Manager and will be stored on site during the construction phase.
- 1.65. These measures will **significantly reduce the potential** for contaminated surface waters entering the aquatic environment.

Wicklow Mountains SAC

1.66. The Wicklow Mountains SAC is designated for its importance for the following Annex I habitats and Annex II species:

- Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) [3110]
- Natural dystrophic lakes and ponds [3160]
- Northern Atlantic wet heaths with *Erica tetralix* [4010]
- European dry heaths [4030]
- Alpine and Boreal heaths [4060]
- Calaminarian grasslands of the *Violetalia calaminariae* [6130]
- Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]
- Blanket bogs (* if active bog) [7130]
- Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) [8110]
- Calcareous rocky slopes with chasmophytic vegetation [8210]
- Siliceous rocky slopes with chasmophytic vegetation [8220]
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0]
- *Lutra lutra* (Otter) [1355]

Conservation Objectives for the Wicklow Mountains SAC

1.67. The conservation objective of the SAC ¹⁴is to restore the favourable conservation condition of all qualifying Annex I habitats and Annex II species.

1.68. **Table 1-4** below identifies the percentage of the extent of various habitat types within the SAC.

¹⁴ NPWS (2017) Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Table 1-4: Habitats of the Wicklow Mountains SAC and their extent within the site

Code	Qualifying Habitats	Extent and Character (%)
N23	Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites)	1.00
N22	Inland rocks, Scree, Sands, Permanent Snow and ice	3.00
N06	Inland water bodies (Standing water, Running water)	2.00
N08	Heath, Scrub, Maquis and Garrigue, Phygrana	45.00
N16	Broad-leaved deciduous woodland	1.00
N10	Humid grassland, Mesophile grassland	20.00
N07	Bogs, Marshes, Water fringed vegetation, Fens	26.00
N19	Mixed woodland	1.00
N20	Artificial forest monoculture (e.g. Plantations of poplar or Exotic trees)	1.00
Total Habitat Cover		100

Threats and Pressures on the Wicklow Mountains SAC

1.69. **Table 1-5** lists the threats, pressures and activities impacting the Wicklow Mountains SAC.

Table 1-5: Threats, pressures and activities impacting Wicklow Mountains SAC

Code	Threats and Pressures	Rank	+/-	Inside/Outside
B06	Grazing in forests/ woodland	H	-	i
G01.03.02	Off-road motorized driving	H	-	b
I01	Invasive non-native species	H	-	b
J01.01	Burning down	H	-	b
K01.01	Erosion	H	-	i
A05.02	Stock feeding	L	-	i
E03.01	Disposal of household / recreational facility waste	L	-	i
F04.02	Collection (fungi, lichen, berries etc.)	L	-	i
G01.04	Mountaineering, rock climbing, speleology	L	-	b
G02.09	Wildlife watching	L	-	i
G05.06	Tree surgery, felling for public safety, removal of roadside trees	L	-	i
L05	Collapse of terrain, landslide	L	-	i
A04	Grazing	M	-	b
C01.03	Peat extraction	M	-	i
D01.01	Paths, tracks, cycling tracks	M	-	b
E01	Urbanised areas, human habitation	M	-	b
F03	Hunting and collection of wild animals (terrestrial)	M	-	i
F03.02.02	Taking from nest (falcons)	M	-	b

G01	Outdoor sports and leisure activities, recreational activities	M	-	b
G01.02	Walking, horseriding and non-motorised vehicles	M	-	b
G04.01	Military manouvres	M	-	b
G05.01	Trampling, overuse	M	-	b
G05.04	Vandalism	M	-	i
G05.07	Missing or wrongly directed conservation measures	M	-	b
K04.05	Damage by herbivores (including game species)	M	-	i
B02.05	Non-intensive timber production (leaving dead wood/ old trees untouched)	H	+	i
G05.09	Fences, fencing	H	+	i

(Rank: H = High, M = Medium, L = Low, I = inside, O = outside, B = both &+/- = Positive/Negative Impact)

Assessment of Likely Impacts Affecting the Wicklow Mountains SAC

- 1.70. The Wicklow Mountains SAC is located approximately 11km East-southeast of Proposed Development Site. As outlined in **Table 1-1**, the Wicklow Mountains SAC has ecological connectivity with the Proposed Development Site due to the qualifying mobile species, otter (*Lutra lutra*).
- 1.71. Drainage ditches and watercourses within the Application Site mostly convey surface water from the site to the Flennington-South River which drains into the Liffey River. A close inspection of river flow direction using the Environmental Protection Agency mapping system¹⁵ indicates that no hydrological connectivity exists between the Application Site and the Wicklow Mountains SAC as the site is a significant distance upstream.
- 1.72. Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*), Natural dystrophic lakes and ponds, Northern Atlantic wet heaths with *Erica tetralix*, European dry heaths, Alpine and Boreal heaths, *Calaminarian* grasslands of the *Violetalia calaminariae*, Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe), Blanket bogs, Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*), Calcareous rocky slopes with

¹⁵ <https://gis.epa.ie/EPAMaps/>

chasmophytic vegetation, Siliceous rocky slopes with chasmophytic vegetation and Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles are the Annex 1 Habitats making up the qualifying interests of this SAC. These habitats are not found within the Application Site boundary, and no hydrological connectivity exists due the habitats being located upstream of the River Liffey.

- 1.73. It is considered that there is **no potential for significant risk of hydrological contamination** on any of the Annex 1 habitats of Wicklow Mountains SAC. These Annex I habitats have been scoped out of any further assessment.
- 1.74. Otter are a qualifying feature of this SAC, otter are a highly mobile species and can hold territories from 2km to 40km. Therefore, there is potential that otter could use the Proposed Development Site. Although no evidence of otter was noted during the habitat survey, drainage ditches and minor watercourses within the Proposed Development Site provide suitable habitat to support commuting otter.
- 1.75. Potential impacts for otter include the loss of habitat, noise and lighting disturbance, fragmentation of habitat and pollution.
- 1.76. As discussed above, there will be no significant direct loss of core otter habitat, as the Proposed Design will include 2m drainage ditch buffers. It is considered that the Proposed Development, which will involve works in proximity to minor watercourses, and within areas which may be utilised by migrating otters, has potential to give rise to likely significant effects upon otter populations of the Wicklow Mountain SAC.
- 1.77. It is considered that in the absence of mitigation there is a chance that otter could still be disturbed and that whilst the type of works and design principles and best practice and mitigation measures will limit the potential for water contamination, additional mitigation measures to further reduce effects on otter have been outlined within this report.
- 1.78. Each of the potential contaminants outlined in **Table 1-2** above have been considered and assessed for their potential occurrence during the phases of the Proposed Development. Potential contaminants are capable of undermining water quality and the conservation objectives for the qualifying species of otter.
- 1.79. Integral design measures include a 2m - 5 buffer around all field drains to reduce the potential for contaminants from the Application Site to enter the aquatic system that have the potential to support commuting otter.
- 1.80. An **Outline Construction Environmental Management Plan (OCEMP)** has been produced in support of this application (please see **Technical Appendix 8**), and this report outlines design and best practice measures for protecting the local environment, including terrestrial and aquatic habitats.
- 1.81. Measures have been included within the Proposed Development Design to prevent pollution entering the aquatic environment. These are outlined below:

- Silt/Bentonite
 - During the construction and decommissioning phase, ground disturbance is limited to the Proposed Development Site. As part of the Proposed Development design, Sustainable Drainage Systems (SuDS) will be implemented to control surface water movement and prevent silt/bentonite entering the aquatic environment. These have been incorporated into the design of the Proposed Development and are required due to relevant regional drainage policies in light of the objectives of the Water Framework Directive and associated water quality Directives and Regulations.
 - This includes the use of silt traps at drainage ditches throughout the site.
- Cement or concrete wash water
 - Best practice pollution prevention measures will be followed during the use of these materials during the construction phase, which will ensure cement/concrete wash water does not enter the aquatic environment.
- Detergent
 - This material will not be used within the Proposed Development Site.
- Hydrocarbons (e.g. oil, diesel)
 - During the construction phase, all work will be undertaken following best practice pollution prevention measures, which include suitable storage of oil/fuels and correct refuelling processes. This will prevent hydrocarbons entering the aquatic system.
- Sewage
 - The only potential sewage produced within the Proposed Development Site will be from the welfare facilities provided for staff during the construction phase. These facilities shall include an appropriate storage facility for sewage, which shall be collected regularly by a licensed waste contractor. Therefore, sewage will not enter the local environment, including aquatic habitats.

- 1.82. Further details on the drainage arrangements and waste management during the construction phase are outlined in the **Mitigation Measures** section below.
- 1.83. Surveys undertaken of the site in support of the application, including those undertaken in 2023 and 2025 and detailed within the accompanying Ecological Appraisal report, did not record the presence of otter or any signs indicative of the presence of otter, within or in proximity to the site.
- 1.84. It is recommended that a pre-commencement otter survey be undertaken by a suitably experienced ecologist prior to the construction phase. Where holts/resting places are found, additional measures may be required to prevent significant effects for otter.
- 1.85. There is potential for any otters using the site during the construction phase to become trapped in trenches excavated during works. As part of the Proposed Development design, security fencing is to have 10cm gaps to allow free movement of otter throughout the site. All excavations during the construction phase of the Proposed Development will be securely covered. Where this is not possible, a means of escape (for example a ramp) and daily checks must be included to allow safe exit from the excavation. This will prevent the accidental trapping of this species.
- 1.86. With the implementation of best practice and design measures, the Proposed Development **will not result in significant adverse effects** to the integrity of the Wicklow Mountains SAC.

Poulaphouca Reservoir SPA

- 1.87. The Poulaphouca Reservoir SPA is designated for its importance for the following Annex II species:
- Greylag Goose (*Anser anser*) [A043]
 - Lesser Black-backed Gull (*Larus fuscus*) [A183]

Conservation Objectives for the Poulaphouca Reservoir SPA

- 1.88. The conservation objectives¹⁶ for the Poulaphouca Reservoir SPA's are:
- to maintain or restore the favourable conservation condition of Greylag Goose in Poulaphouca Reservoir SPA, as defined by a list of attributes and targets including
 - Winter population trend – Long term winter population trend is stable or increasing.

¹⁶ NPWS (2024) Conservation objectives for Poulaphouca Reservoir SPA [004063]. Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.

- Winter spatial distribution – Sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target.
 - Disturbance at wintering site – Disturbance occurs at levels that do not impact the achievement of targets for population trend and spatial distribution.
 - Barriers to connectivity and site use – Barriers do not significantly impact the wintering populations access to the SPA or other ecologically important sites outside the SPA.
 - Forage spatial distribution, extent and abundance – Sufficient number of locations, area and availability of suitable roosting habitat to support the population target.
 - Roost spatial distribution and extent – Sufficient number of locations, area and availability of suitable roosting habitat to support the population target.
 - Supporting habitat: area and quality – Sufficient area of utilisable habitat available in ecologically important sites outside the SPA.
- To maintain the favourable conservation condition of Lesser Black-backed Gull in Poulaphouca Reservoir SPA, which is defined by a range of attributes and targets including:
 - Winter population trend – Long term winter population trend is stable or increasing.
 - Winter spatial distribution – Sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target.
 - Disturbance at wintering site – Disturbance occurs at levels that do not significantly impact the achievement of targets for population trend and spatial distribution.
 - Barriers to connectivity and site use – Barriers do not significantly impact the wintering population's access to the SPA or other ecologically important sites outside of the SPA.

- Forage spatial distribution, extent and abundance – Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target.
- Roost spatial distribution and extent – Sufficient number of locations, area and availability of suitable roosting habitat to support the population target.
- Supporting habitat: area and quality – Sufficient area of utilisable habitat available in ecologically important sites outside the SPA.

Character of the Qualifying Interests of Poulaphouca Reservoir SPA

- 1.89. **Table 1-8** below identifies the percentage of the extent of various habitat types within the SPA.

Table 1-8: Habitats of the Poulaphouca Reservoir SPA and their extent within the site

Code	Habitats	Extent and Character (%)
N06	Inland water bodies (Standing water, Running water)	98.0
N10	Humid grassland, Mesophile grassland	1.0
N07	Bogs, Marshes, Water fringed vegetation, Fens	1.0
Total Habitat Cover		100

Threats and Pressures on the Poulaphouca Reservoir SPA

- 1.90. **Table 1-9** lists the threats, pressures and activities impacting the Poulaphouca Reservoir SPA.

Table 1-9: Threats, pressures and activities impacting Poulaphouca Reservoir SPA

Code	Threats and Pressures	Rank	+/-	Inside/Outside
F03.01	Hunting	L	+/-	i
G01.01	Outdoor sports and leisure activities, recreational activities	M	+/-	i
F02.03	Leisure fishing	L	+/-	i
B01	Forest planting on open ground	H	+/-	o

D01.05	Bridge, viaduct	H	+-	i
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(Rank: H = High, M = Medium, L = Low, I = inside, O = outside, B = both & +/- = Positive/Negative Impact)

Assessment of Likely Impacts Affecting the Poulaphouca Reservoir SPA

- 1.91. Likely significant effects to the Poulaphouca Reservoir SPA could not be excluded at the screening stage, due to potential ornithological connectivity with the Application Site. SCI species greylag goose and lesser black-backed gull have potential to utilise habitats within the Application Site, namely areas of improved grassland, for foraging and loafing, in the winter.
- 1.92. Research indicates that greylag geese have a core foraging range of 15km¹⁷, therefore it is possible that this species would forage within the Application Site. To determine whether this species was using the Application Site to forage during the winter period, a winter bird survey was undertaken in the 2022/23 winter season with further bird surveys undertaken across the winter of 2025/26. The results of which are outlined in **Technical Appendix 2, Appendix 2E: Winter Bird Survey Report** and **Technical Appendix 2, Appendix 2F: 2025/2026 Bird Survey Report** which are appended to the accompanying EcA report. These additional surveys utilised a non-breeding walkover survey methodology¹⁸ or visits undertaken between September 2025 and February 2026 with a breeding bird survey methodology¹⁹ utilised for survey undertaken in March and April 2026. No specific methodologies for breeding or non-breeding bird surveys of solar farm sites are presented by NatureScot within their relevant guidance. Recommended survey methodologies are set out by NatureScot for onshore wind projects only and not considered relevant to solar development.
- 1.93. NatureScot pre-application guidance for solar farms²⁰, states that bird surveys for solar PV proposals should be proportionate to the specific proposal and that such surveys should be appropriate to the species likely to be breeding and/or wintering on the site.
- 1.94. During the winter surveys, there were no sightings of greylag geese either within or immediately surrounding the Application Site. Greylag Geese have not been observed in any of the additional bird surveys undertaken in 2025/2026.
- 1.95. On this basis, it is not considered that the Application Site is of any particular value for greylag goose.
- 1.96. There is abundant suitable winter foraging and loafing habitat for this species, in the 5.5km wide area of open landscape between the SPA and the Application Site. No potential adverse effects upon site integrity are therefore predicted to arise to the SPA through impacts to SPA greylag goose populations as result of the Proposed Development.

¹⁷Scottish Natural Heritage. Assessing Connectivity with Special Protection Areas (SPAs). Available at: [file:///C:/Users/User/Downloads/Assessing%20connectivity%20with%20special%20protection%20areas%20\(4\).pdf](file:///C:/Users/User/Downloads/Assessing%20connectivity%20with%20special%20protection%20areas%20(4).pdf)

¹⁸ [Non-breeding Walkover Survey | Bird Survey Guidelines](#)

¹⁹ [Survey methodology | Bird Survey Guidelines](#)

²⁰ [NatureScot pre-application guidance for solar farms | NatureScot](#)

- 1.97. The Poulaphouca Reservoir is also a winter roost site for lesser black-backed gull and provides abundant prey for foraging populations of this species. However, lesser black-backed gull are not confined to wetland habitats and will forage in domestic waste and fields of crop and grasslands.
- 1.98. A desk study search undertaken with the National Biodiversity Data Centre, returned presence records for lesser black-backed gull from the Application Site.
- 1.99. Lesser black-backed gull was recorded within the Application Site during the bird surveys undertaken in 2025/2026. This included a range of sightings summarised in **Table 1-10**, below.

Table 1-10 Lesser Black-Backed Gull Records

Species	Count	Behaviour	Month
Lesser Black-backed Gull	3	In Field 16	September
Lesser Black-backed Gull	6	In Field 16	September
Lesser Black-backed Gull	4	Flying Over	October
Lesser Black-backed Gull	9	Flying Over	October
Lesser Black-backed Gull	1	Flying Over	October
Lesser Black-backed Gull	20	Foraging in Field 19	November
Lesser Black-backed Gull	1	Flying Over	November
Lesser Black-backed Gull	1	Flying Over	November
Lesser Black-backed Gull	1	Flying Over	November
Lesser Black-backed Gull	10	Flying Over	November
Lesser Black-backed Gull	48	Flying Over	November

Lesser Black-backed Gull	2	Flying Over	November
Lesser Black-backed Gull	1	Calling	December
Lesser Black-backed Gull	6	Flying Over	January
Lesser Black-backed Gull	7	Flying Over	February
Lesser Black-backed Gull	1	Flying Over	February
Lesser Black-backed Gull	2	Calling	March
Lesser Black-backed Gull	3	In Field 16	March
Lesser Black-backed Gull	3	In Field 37	April
Lesser Black-backed Gull	1	Flying Over	April

- 1.100. Neo-Environmental have been made aware of a report produced by a Dr. Shane Somers, submitted as an appendix to an objection to the Proposed Development, lodged by the Punctestown Area Community Group and dated 26th March 2025. This report details findings of bird surveys undertaken of areas of land approximately 800m to the north of the Application Site boundary.
- 1.101. This survey, undertaken on the 7th March 2025, recorded the presence of a peak number of 11 lesser black-backed gulls on an area of farmland which is screened from the Application Site by an area of conifer plantation. It is not considered that these survey results offer anything further beyond the survey results gathered by Neo-Environmental in assessing the potential impacts of the Proposed Development on lesser black-backed gulls. Furthermore, given the presence of the forestry screening, it is not considered that the Proposed Development would have potential to give rise to any adverse effects to birds utilising these areas in the future.
- 1.102. Further surveys undertaken by Neo Environmental, and detailed within the accompanying Ornithology Report, have included a significant degree of survey effort expended on the site, in respect of both breeding and wintering bird populations. Methodologies utilised were in line with relevant guidelines and best practice. As summarised above, the Application Site was recorded to support consistent usage by a low number of lesser black-backed gulls with

relatively higher numbers recorded fly over the site. Greater numbers, as shown by Dr. Somers report, are to be found utilising similar habitats in the wider area and it is possible that birds recorded within the site form part of a wider foraging colony which utilises an array of agricultural lands in proximity to the site. However, the surveys undertaken do not indicate that the Application Site is of significant value or importance for lesser black-backed gull. The mean recorded number of birds utilising the site (4.38 birds per visit) represents 0.67% of the population of the Poulaphouca Reservoir SPA.

- 1.103. Given the low number of birds recorded, the nature of the Proposed Development which will not give rise to significant potential effects on the species outside of the Application Site boundary and the clearly demonstrated availability of suitable alternative habitats present outside and in proximity to the Application Site, it is considered that the Proposed Development would not give rise to any adverse effect upon the integrity of the Poulaphouca Reservoir SPA in the absence of the application of mitigation measures.
- 1.104. On the basis of the above, it is not considered that the Proposed Development will give rise to any adverse effects upon the integrity of the Poulaphouca Reservoir SPA through adverse effects upon lesser black-backed gull populations.

Summary of Potential Impacts on Natura Sites within 15km

- 1.105. From the findings of the above assessment, it is considered that the Proposed Development will not adversely affect the integrity of any Natura 2000 sites. This is relevant for the construction, operation and decommissioning stages.

DESIGN, BEST PRACTICE AND MITIGATION MEASURES

- 1.106. Mitigation measures have been outlined to limit potential impacts for the qualifying features of Natura 2000 sites. These are outlined in **Table 1-11**.

Table -1-11: Design, best practice and mitigation measures

FEATURE	POTENTIAL IMPACT	PHASE OF DEVELOPMENT	MEASURES IMPLEMENTED
INTEGRAL DESIGN MEASURES			
Aquatic environment	Pollution	Construction	2-5m Buffer from field drains
Otter	Exclusion from foraging habitat	Construction	Security fencing to a 10cm gap at base to allow free movement of otter through the site.
STANDARD BEST PRACTICE MEASURES			
Aquatic environment	Pollution	Construction	Best practice pollution prevention measures implemented prior to and throughout the construction phase to prevent contaminants entering the aquatic environment (outlined below). Best practice biosecurity measures to be implemented throughout the construction phase.
Otter	Accidental trapping within excavations	Construction	All excavations should be securely covered, or a suitable means of escape provided at the end of each working day.

MITIGATION MEASURES			
Otter	Disturbance	Pre-construction	Pre-commencement survey (Measures dependant on survey findings).

- 1.107. The measures outlined above will be implemented prior to or during the construction phase of the development. The pre-construction otter survey must be undertaken within 48 hours of construction start. Otter surveys can be carried out at any time of year but should be avoided following periods of prolonged heavy rainfall when spraints and other signs of otter may be washed away.

Pollution Prevention

- 1.108. Suitable protection for watercourses potentially affected by the works will be installed prior to relevant works proceeding. These measures will be in-line with Environmental Protection Agency (EPA) Pollution Prevention Guidelines. Protection measures will include:
- Plant and equipment will be stored on dedicated hardstandings within the construction compound (Part of the Consented Development). This will minimise the risk of pollution caused by leakages occurring out of hours. Drip trays will be used where appropriate;
 - All plant and equipment will utilise biodegradable hydraulic oil;
 - Spill kits will be readily available to all personnel. The spill kits will be of an appropriate size and type for the materials held on site;
 - Diesel fuel will be stored in a bunded diesel bowser which will be located within a fenced off area in the construction compound;
 - Refuelling and maintenance of vehicles and plant will take place in designated areas of hardstanding;
 - All other chemicals will be stored within a storage contained with an accompanying COSHH Datasheet;

- Wastewater from the temporary staff toilets and washing facilities will be discharged to sealed containment systems and disposed via licensed contractors; and
- 1.109. All staff on site will be made aware of the pollution prevention measures being implemented throughout the construction and decommissioning phases using appropriate toolbox talks and the site induction.

Noise and Vibration

- 1.110. Operating plant noise will be kept within the standards and time periods dictated for the site. Any noncomplying plant will be stopped and stood down until it can be rectified or removed from the site.
- 1.111. The British Standard which gives guidance on noise from construction and mineral working sites is BS 5228. This document does not specify absolute noise limits relating to construction activities; however, it does provide detailed guidance on the steps that can be taken to minimise potential noise & vibration effects. Reasonable mitigating measures are as follows: vehicles and machinery will be switched off when not in use
- 1.112. Operation of plant, including fitting and proper maintenance of silencers and/or enclosures, avoiding excessive and unnecessary revving of engines and parking of equipment in locations which avoid possible effects on residential properties.

Deliveries limited to:

- 07.00 to 19.00 Monday to Friday.
 - 08.00 to 16.00 Saturdays.
 - Public holidays will be observed unless otherwise agreed with the local planning authority.
 - When loading and unloading material, attempts shall be made not to drop material from a height.
- 1.113. Any noise complaints shall immediately be directed to the site manager. Depending on the nature of the complaint remedial action may need to be undertaken.

Dust

- 1.114. In order to control, prevent and minimise dirt on the access route and emissions of dust and other airborne contaminants during the construction works, the following measures will be implemented:

- Wheel washing equipment will be available and used on-site, as required to prevent the transfer of dirt and stones onto the public highway. All drivers will be required to check that their vehicle is free of dirt, stones and dust prior to departing from the site. Wheel washing will likely be a water bowser and power spray. It will not have any cleaning additives and will drain into the temporary drainage feature at the site compound.
- During windy conditions, any dust generating activities will be avoided or minimised, where practical.
- Any soil stockpiles will be covered when left for extended periods of time.
- Driving practices which minimise dust generation will be adopted.
- Loads into and out of the site will be covered where required.

DRAINAGE MANAGEMENT PLAN

- 1.115. The measures described in this section will be adopted during the construction phase in order to manage on-site drainage in accordance with current best practice and legislation.

Monitoring Records and Emergency Spill Response

Monitoring

- 1.116. To ensure compliance with the detailed Drainage Management Plan (“DMP”), drainage management works will be supervised by the site engineer.

Emergency Spill or Pollution Response

- 1.117. In the event of a liquid spill occurring on a construction site, the Contractor shall cease work immediately in the vicinity. Contractor's trained personnel shall do an appropriate PPE and as follows:
- Locate the source of the pollution and stop/contain any further flow if possible;
 - If spillage is flammable, extinguish all ignition sources;
 - Immediately deploy the spill kit in accordance with the manufacturer's instructions;
 - Clean up the spill; and

- All used spill kit materials should be disposed of in the proper manner as outlined in spill summary procedures.
- 1.118. The Site Manager shall contact:
- The Client;
 - Environmental Protection Agency (“EPA”) 24-hour emergency incident line 1890 33 55 99; and
 - Inland Fisheries 24-hour pollution line 1890 34 74 24. The pollution hotline number shall be referenced in the construction site rules and displayed in the Site Office and in the Emergency preparedness & response plan.
- 1.119. Each Contractor working with controlled substances shall supply appropriate spill kits which shall be kept on site. The spill kits shall be made accessible at all times to all site personnel.
- 1.120. In the event of a fire, all personnel must evacuate the site and assemble at the site entrance. The Site Manager is responsible for calling the Fire Service, who will handle the emergency.

Proposed Drainage Arrangements

- 1.121. As outlined within the supporting **Technical Appendix 4: Flood Risk & Drainage Impact Assessment**, SuDS will be installed as part of the site preliminary works prior to the main equipment deliveries. This SuDS feature will take the form of soakaway channels. The layout of the drainage design is indicated within **Figure 4.5, Appendix 4A of Technical Appendix 4**.²¹

Construction Phase

- 1.122. Due to the addition of the three temporary construction compounds during the construction phase, additional drainage measures will be implemented to help attenuate the increase in surface water flows, if surface water is observed discharging from the construction compounds.
- 1.123. Runoff from these areas is anticipated to have high silt loading due to mobilised soils from excavated surfaces, fines from track aggregate and sludge due to traffic.
- 1.124. Hardstanding runoff will be directed to a swale on each of the compound’s lowest boundary. These drainage schemes will be removed at the end of the construction stage and the area will be reinstated.

²¹ McGhee, M (2023) Technical Appendix 4 - Flood Risk Assessment – Dunstown Solar Farm

Operational Phase

- 1.125. Any existing on-site drainage ditches or features will be cleaned out as part of the preliminary works and maintained throughout the construction period and will continue to intercept overland flows from the site.
- 1.126. The location of the soakaway channels have been chosen on the downward slope, near to the existing watercourses which run through the Site. The idea is to capture any overland flow in the SuDS device, prior to releasing into the natural surface water system.
- 1.127. The proposed soakaways (see **Figure 4.5: Appendix 4A**) will have an overall combined length of approximately 1,220m, with a base width of 1.0m, a 0.5m design depth and a 0.15m freeboard. They will be filled with crushed rock with a void ratio of 20%.
- 1.128. It will provide a total storage volume of approximately 122.0m³. This is greater than the volume of additional runoff generated as a result of the impermeable buildings (113.0m³). It is therefore considered that this adequately mitigates the increase in flow rates as a result of the minor increase in impermeable area and provides improvement.
- 1.129. The soakaways will be implemented during the construction phase of the proposed solar farm and planted with vegetation to protect against soil erosion. They will be maintained throughout the lifespan of the Proposed Development, generally in accordance with the recommendations in the appropriate guidance.
- 1.130. Additional drainage measures to be implemented on-site include the following:
- Solar Panels: current grass cover is to be retained or reinstated adjacent to and under panels in order to maximise bio-retention;
 - Tracks: tracks are to be unpaved and constructed from local stone. Temporary swales or similar shall be utilised to collect runoff from tracks with discharge to ground through percolation areas, where required. Where swales are utilised, frequent checks of dams formed from gravels and other excavated material should be undertaken; and
 - Transformers: the scale of these types of structures is unlikely to warrant a formalised drainage system. Runoff from this infrastructure and any associated hard standing should be directed to a percolation area for discharge to ground. Should surface water accumulate around any of these locations then a simple soakaway can be constructed to allow water soak into the underlying subsoils.

Drainage Mitigation

Clean Water Diversion

- 1.131. Where feasible, clean water (e.g. water that has yet to come into contact with any disturbed construction or working areas), will be kept separate from the watershed or intercepted by the solar farm construction drainage.
- 1.132. Up-gradient cut-off ditches and water diversion measures will be installed, where required, in order to intercept and divert clean water around construction compound area. These measures will be installed ahead of the main construction works. This will reduce or prevent the amount of potential silt-laden or polluted water that might require treatment.
- 1.133. Clean runoff that has been diverted around an area of working should be discharged into an area of vegetation for dispersion or infiltration, in accordance with SuDS techniques.
- 1.134. Sediment control measures, such as silt traps, gravel, sand bags, anchored straw bales or silt fencing might be required at the discharge point to prevent erosion at the outlet and aid dispersion of the diverted water.

Silt Control

- 1.135. Silt-laden runoff should be expected from any areas of recently exposed soil or rock. There is also potential for pollution to occur from machinery used in the solar farm construction.
- 1.136. Any introduced or artificial materials required (e.g. silt fencing, straw bales, sand bags etc.) that might need to be deployed onsite, will be removed on completion of the works.
- 1.137. Discharge from the silt control measures will be discharged into an area of vegetation for dispersion or infiltration, in accordance with SuDS techniques or discharged into the existing drainage network within the Application Site.

CONSIDERATION OF CUMULATIVE EFFECTS

- 1.138. As well as singular effects, cumulative effects also need to be considered. Article 6 of the EU Habitats Directive and Regulation 15 of the European Communities (Natural Habitats) Regulations state that any plan or project that may, either alone or in combination with other plans or projects, significantly affects a Natura 2000 site, should be the subject of an AA.
- 1.139. Cumulative impacts can be an issue when proposals have a small impact on Natura 2000 sites. If other proposals have a small impact, the combined result can have a significant impact on the Natura 2000 site.
- 1.140. The European Commission Habitats Directive and the Habitats Regulations 2011 require that the impacts on European sites be assessed from the plan or project in question and also in the presence of other plans and projects that could affect the same Natura 2000 sites.
- 1.141. This Stage 2 AA screening has identified other plans and projects that could act in combination with the Proposed Development and its associated future elements, to identify if they pose likely significant effects on European sites.
- 1.142. It concludes that if these other Plans and Projects have undergone an AA themselves and have either been adopted or consented following an AA then it cannot pose likely significant adverse effects on European sites.

Plans

- 1.143. A review of the following plans was undertaken;

National Planning Framework 2040

- 1.144. The National Planning Framework (NPF) 2040 is a high-level, national vision and provides the strategic framework and principles to manage future population and economic growth in Ireland over the next 20 years. It informs the parameters for the preparation of Regional Spatial and Economic Strategies (RSEs) by each of the three Regional Assemblies, established under the Local Government Reform Act 2014.
- 1.145. In order to comply with the requirements of Article 6(3) of the EU Habitats Directive an AA screening was undertaken at an early stage in the drafting of the National Planning Framework (NPF).
- 1.146. Adopting the precautionary principle, it was concluded that a NIS should be prepared. An NIS was prepared by RPS on behalf of the Minister for Housing, Planning and Local Government. The NIS considered the potential for the NPF to adversely affect the integrity of any Natura 2000 site(s); with regard to their qualifying interests, associated conservation status, the structure/function of the site(s) and the overall site(s) integrity. This was done in a two-stage

process, initially assessing the draft NPF and subsequently assessing the changes made post consultation for the NPF.

- 1.147. The Minister of Housing, Planning and Local Government, having considered the AA and its conclusions determined that;

“the adoption and publication of the NPF as a replacement of the National Spatial Strategy for the purposes of section 2 of the Planning Development Act 2000 will not individually or in combination with any other plan or project adversely affect the integrity of any European Site (as defined).”

- 1.148. Thus, the in-combination impacts from the NPF, with the Proposed Development are **not predicted to result in any Likely Significant Effects** to any European site(s).

Regional Spatial and Economic Strategy for the Eastern and Midland Region

- 1.149. In order to comply with the requirements of Article 6 (3) of the EU Habitats Directive and Part XAB of the Planning and Development Act 2000 (as amended), the process of Screening for AA was undertaken at an early stage in the drafting of the RSES.
- 1.150. The AA Screening undertaken by ecologists at RPS on behalf of the Eastern and Midland Regional Assembly, assessed whether the RSES was likely to have significant effects on any European Sites within the Natura 2000 network, either alone or in combination with other plans and projects.
- 1.151. The screening concluded that an AA of the RSES was required, as the Plan is not directly connected with or necessary to the management of the sites as European sites and as it cannot be excluded, on the basis of objective information, that the Plan, individually or in combination with other plans or projects, would have a significant effect on a European site.
- 1.152. Therefore, adopting the precautionary principle, it was concluded that a NIR should be prepared. The NIR (prepared by RPS on behalf of the Eastern and Midland Regional Assembly) considered the potential for the RSES to adversely affect the integrity of any Natura 2000 site(s), with regard to their qualifying interests, associated conservation status, the structure/function of the site(s) and the overall site(s) integrity.
- 1.153. The Assembly determined that pursuant to Article 6(3) of the Habitats Directive and Part XAB of the Planning and Development Act 2000-2018, that the adoption and publication of the RSES as a replacement for the “Regional Planning Guidelines” for the purposes of Section 24 (4) of the Planning and Development Act 2000 (as amended) **would not either individually or in combination with any other plan or project adversely affect** the integrity of any European Site.

Kildare County Development Plan 2023-2029

- 1.154. Consolidated Natura Impact Report (NIR) has been prepared in support of the Appropriate Assessment (AA) of the Kildare County Development Plan 2023-2029²² in accordance with the requirements of Article 6(3) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.
- 1.155. All projects within the Plan area and receiving environment were considered in combination with any and all lower tiers projects that may arise due to the implementation of the Plan. Given the uncertainties that exist with regard to the scale and location of developments facilitated by the Plan, it is recognised that the identification of in-combination effects is limited, and that the assessment of in-combination effects will need to be undertaken in a more comprehensive manner at the project-level.
- 1.156. The effects that could arise from the Plan were examined in the context of several factors that could potentially affect the integrity of any European site. On the basis of the findings of this Screening for AA, it is concluded that the Plan:
- Is not directly connected with or necessary to the management of any European site; and
 - May, if unmitigated, have significant effects on 38 (no.) European sites.
- 1.157. Consequently, a Stage 2 AA was required for the Plan. This assessed whether the Plan alone, or in-combination with other plans, programmes, and/or projects, would result in adverse impacts on the integrity of the 38 European sites brought forward from screening.
- 1.158. The Assessment of potential impacts on European sites was conducted utilising a standard source-pathway model (see approach referred to under Sections 1.3 and 3). The 2001 European Commission AA guidance outlines the following potential changes that may occur at a designated site, which may result in effects on the integrity and function of that site: loss/reduction of habitat area; habitat or species fragmentation; disturbance to key species; reduction in species density; changes in key indicators of conservation value (water quality etc.); and climate change.
- 1.159. The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be subject to AA/screening for AA when further details of design and location are known. In-combination effects from interactions with other plans and projects was considered in the assessment and the mitigation measures incorporated into the plan are seen to be robust to ensure there will

²²<https://kildarecoco.ie/AllServices/Planning/DevelopmentPlans/KildareCountyDevelopmentPlan2023-2029/>

be no significant effects as a result of the implementation of the Draft Plan either alone or in combination with other plans/projects.

- 1.160. With the incorporation of mitigation measures, it is concluded that the Kildare County Development Plan is not foreseen to give rise to any significant effects on designated European sites, alone or in combination with other plans or projects
- 1.161. The above plan **is not predicted to result in any significant effects** to any Natura 2000 sites and there will be **no effects on Natura 2000 sites from the Proposed Development**. Therefore, it has been concluded from the above assessments that there will be no in combination effect from the reviewed plans with the Proposed Development and associated future elements.

Projects

- 1.162. A search of the Kildare County Council online planning portal revealed that currently there is one solar farm developments granted within 5km of the Proposed Development Site. Other, similar sized developments within the 5km study area can be found in **Table 1-13** below.

Table 1-13 Developments within 5km of the Proposed Development

Planning Reference	Brief Project Description	Distance and Direction	Planning Status	Date Granted
19750	91 no. 2 storey residential dwellings.	3.6km Southeast	Granted – conditional	27/03/2020
221016	10 - year planning permission to develop a synchronous condenser grid support facility.	2.9km West-southwest	Granted – conditional	17/11/2022
22111	129ha Solar Farm - Swordlestown North and Swordlestown South.	0.3km Northwest	Granted – conditional	10/08/2022
18969	Solar farm installed over landfill.	4.6km Southwest	Granted – conditional	21/08/2019
211175	Extension to Dunstown 400kv substation.	2.8km Southwest	Granted – conditional	26/07/2022

- 1.163. There are two consented solar farms and one solar farm extension currently undergoing appeal within 5km of the proposed Dunstown Solar Farm. The majority of planning applications within the area of the Application Site are small residential or agricultural developments however some additional larger residential developments have been selected and included in this assessment. Solar farms have a relatively minor footprint, due to the panels being mounted on piles and are designed to prevent biodiversity loss. The implementation of biodiversity management plans (BMPs) at constructed solar farms provides suitable habitat and management regime to enhance the solar farms ecological

value for local wildlife. Therefore, there will be no cumulative loss of habitat if the Proposed Development is consented.

- 1.164. Proposed Solar Farm, Swordlestown North and Swordlestown South, County Kildare (Planning Reference **22111**) is a granted solar development within 5km of the Proposed Application Site. Strategic Power Projects Limited submitted an AA in support of the Application. The AA Screening identified that there will be no significant impact on the surrounding SAC's given the mitigation and best practice measures that have been recommended. As such, it is expected that significant adverse effects are not likely to arise from this development to the Natura 2000 Network in combination with the proposed Dunstown Solar Farm given the inclusion of mitigation, best practice pollution prevention measures and measures to improve biodiversity contained within the AA. The AA also concluded that a stage 2 NIS is not required due to low impacts.
- 1.165. Proposed Solar Farm over a restored landfill, Brownstown and Carnalaway, Kilcullen, Co. Kildare (Planning Reference **18969**) has been consented by Kildare County Council. O'Callaghan Morna submitted an AA report in support of the Application. It was concluded in the AA that the Solar Farm Development will not have any significant direct or indirect cumulative impact on any Natura 2000 sites. As such, it is expected that significant adverse effects are not likely to arise from this development to the Natura 2000 Network in combination with the proposed Dunstown Solar Farm given the inclusion of mitigation, best practice pollution prevention measures and measures to improve biodiversity contained within the AA. The AA also concluded that a stage 2 NIS is not required due to low impacts.
- 1.166. Granted Planning Reference **19750** relates to large residential development. The site is located in a fully serviced urban environment and the planning authority concluded the development would not by itself or in combination with other plans and projects in the vicinity, have a significant effect on European Sites. Furthermore, with the application an AA screening report was submitted and it too stated that no in-combination effects are anticipated. Therefore, **no significant cumulative effects** will occur on any Natura 2000 site as a result of the granted residential development, in combination with other Proposed Developments.
- 1.167. Similarly with respect to the grid support facility covered off in Planning Reference **221016**, the AA concluded that there was not considered to be any impacts arising from the project that could result in significant effects to SACs and SPAs in its assessment when acting in combination with similar impacts elsewhere.
- 1.168. The majority of planning applications within the area of the Proposed Development Site are small residential or agricultural developments.
- 1.169. The Proposed Development will have at worst a negligible effect upon any individual receptor. For the purposes of this assessment, it is therefore confirmed that **no likely significant cumulative effects** will occur upon any nearby environmental designated site, habitats or protected and Priority species.

CONCLUSION

- 1.170. Within the 15km zone of influence (ZOI) surrounding the Proposed Development Site there are seven Natura 2000 Designated Sites. There are five Special Areas of Conservation (SACs), Wicklow Mountains SAC, Red Bod, Kildare SAC, Pollardstown Fen SAC, Mouds Bog SAC, Ballynafagh Lake SAC and two Special Protection Areas ('SPAs'); Poulaphouca Reservoir SPA and Wicklow Mountains SPA.
- 1.171. It has been concluded that there is potential ecological connectivity between the Proposed Development Site and the Wicklow Mountains SAC and ornithological connectivity between the Proposed Development Site and Poulaphouca Reservoir SPA.
- 1.172. With the implementation of integral design measures, mitigation and best practice construction methods, there will be no significant effects for all Natura 2000 designated sites within the zone of influence (ZOI). The main qualifying features of these sites have been outlined and assessed in full in this report.
- 1.173. As no connectivity (pathway for impacts) exists between the Proposed Development Site and the remaining Natura 2000 designated sites within the study area, these have been 'scoped out' from further assessment.
- 1.174. To minimise potential impacts on Natura 2000 designated sites, design measures have been incorporated into the Proposed Development as part of the iterative design process. These include 2-5m buffers from all drainage ditches.
- 1.175. Standard best practice pollution prevention measures for the construction stage have also been outlined and considered as part of the impact assessment stage.
- 1.176. Recommended survey work as part of the relevant mitigation measures has been provided within this report (**Table 1-11**).
- 1.177. With the implementation of these measures, along with ongoing monitoring to ensure compliance, it is considered that the Proposed Development **will not have an adverse effect upon the integrity of any Natura 2000 sites**.
- 1.178. It is therefore considered that the next stage (Stage 3; Assessment of Alternatives) of the Appropriate Assessment is not required.

APPENDICES

Appendix A

- Figure 1– Natura 2000 Designated Sites



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