



APPROPRIATE ASSESSMENT

SCREENING and NATURA IMPACT STATEMENT

IN ACCORDANCE WITH THE REQUIREMENTS OF

ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

Tullan Strand Facility Centre for Water Sports Activities and
Accessible Pathway to Tullan Strand Beach
Tullan Strand, Finner, Bundoran, Co. Donegal

For: Paul Doherty Architects Ltd.

Castle Street

Donegal Town

Co. Donegal

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Prepared by:

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PROJECT MANAGEMENT & ENVIRONMENTAL SERVICES

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1.0 Introduction

This report has been prepared by Jessica Devlin with input from Barbara McInerney of Wild on Foot, for Paul Doherty Architects Ltd. and Donegal County Council for the purpose of a Planning Permission Application pertaining to the Platform for Growth: Facilities for water sports activities at Tullan, Bundoran, Co. Donegal, Ireland. The screening report (section 1-10) describes the proposed project and the receiving environment. The zone of likely influence and any Natura 2000 sites within that zone is identified. Any possible negative direct or indirect impacts on the Qualifying Interests (QI) / Special Conservation Interests (SCI) of the Natura 2000 sites are identified and the significance of the impacts assessed.

The Natura Impact Statement (section 11-15) provides an examination, analysis and evaluation of the potential impacts of the proposed development on Natura 2000 sites and presents findings and conclusions with respect to the proposed development in light of the best scientific knowledge in the field.

It considers the implications of the proposed development, on its own and in combination with other plans or projects, for Natura 2000 sites in view of the conservation objectives of those sites. It includes a scientific examination of evidence and data to identify and assess the implications of the proposed development for any Natura 2000 sites in view of the conservation objectives of those sites. It considers whether the proposed development, by itself and in combination with other plans or projects, would adversely affect the integrity of Natura 2000 sites. In reaching a conclusion in this regard consideration is given to any mitigation measures necessary to avoid or reduce any potential negative impacts.

The NIS will assist ACP in determining whether or not the proposed development will adversely affect the integrity of any Natura 2000 sites, either alone or in combination with other plans and projects, taking into account their conservation objectives.

Findings are based on research and surveys carried out from 2024-2025 and the report also refers to data and results from previous survey work undertaken by CAAS Ltd. on behalf of Fáilte Ireland in 2020-2021.

This report follows the methodology set out in the Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4), E.C., 2002.

1.1 Natura 2000 and Appropriate Assessment

The introduction of the EU Birds Directive and the Habitats Directive in 1979 and 1992 respectively, made member states legally obliged to establish a Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species. This comprises Special Areas of Conservation (SACs, including candidate SACs), and Special Protection Areas (SPAs, including proposed SPAs). SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the qualifying interests of the sites; from these the conservation objectives of the site are derived.

Articles 6(3) and 6(4) of the Habitat Directive 92/43/EEC require an Appropriate Assessment of plans and projects to prevent significant adverse effects on Natura 2000 sites. The Assessment must determine whether the plan or project is likely to have significant effects on the site and whether these effects will adversely affect the integrity of the site in terms of its nature conservation objectives.

Article 6(3) of the Habitats Directive states that:

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

light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

The assessment can be broken down into 4 main stages:

Stage 1 - Screening: Results of preliminary impact identification and assessment of significance of impacts.

Stage 2 - Appropriate Assessment: Assessment of the impact on the integrity of the site(s) and assessment of mitigation measures (NIS Report).

Stage 3 - Assessment of alternative solutions.

Stage 4 - Imperative Reasons of Overriding Public Interest (IROPI): IROPI test and assessment of compensatory measures.

2.0 Statement of authority

Jessica Devlin graduated from the National University of Ireland, Galway in 1997 with a BSc. honours degree in Geology and obtained a MSc. in Applied Environmental Science from Queens University Belfast in 2001. She attained a National Certificate in Eco-Tourism, from Sligo Institute of Technology in 2005 and in 2014 completed Geographical Information Systems for Environmental Investigations, University College Dublin.

Over the years, Jessica has gained a wide range of experience in research, consultancy and project management with particular emphasis on sustainable development in freshwater, marine and coastal environments.

As field scientist with the Queens University Marine Station in Portaferry, Jessica carried out habitat surveys with respect to the decline of salmonid populations in Northern Ireland Rivers. She progressed to research assistant with Queens University and the Department of Agriculture & Rural Development. As project manager for the Donegal County Council - Marine & Water Leisure Programme, she managed projects on sustainable development of the marine leisure product. Jessica also worked with the University College Cork Coastal and Marine Research Centre in partnership with Donegal County Council and the University of Ulster, as manager of the Donegal element of a North West Europe Interreg Project called IMCORE (Innovative Management of Europe's Changing Coastal Resource). For the past 12 years Jessica has been self-employed working as a project manager and environmental consultant, specialising in freshwater, marine, coastal and environmental projects. Her client base is wide reaching from state agencies to community groups, individuals, angling clubs and private developers.

Barbara McInerney - Ecologist

Bird and bat surveys were carried out by Barbara McInerney, Wild on Foot

Barbara McInerney studied Applied Biology and Field ecology and moved from carrying out laboratory work for many years to working with National Parks and Wildlife Service (NPWS) for four years as education officer and a corncrake field worker. Since 2009 she has worked as a freelance Ecologist carrying out appropriate assessments, bird, mammal and habitat surveys. She also delivers ecological talks and workshops.

Bird survey work includes specific species such as, Hen Harrier, Red Grouse, Merlin, Chough and Storm Petrel. Other bird survey work includes IWEBS and bird surveys for the Heritage Council.

As a member and volunteer for Bird Watch Ireland, she completed the Countryside Bird Survey annually for many years.

She is a member of and has been involved with Bat Conservation Ireland since 2005, carrying out emergence counts, biometrics of roosts, investigations of swarming sites, radio tracking and training in bat capture methods. She participates in the Car Bat Monitoring survey, Daubenton's bat surveys, Brown Long-Eared Bat monitoring, BATLAS and Woodland Bat Monitoring schemes.

She has carried out countless bat surveys on built structures, windfarms, road developments and research projects. In 2017 she was one of a team of four who trapped and radio tagged Brown Long-Eared Bats and in 2018 she took part in an international census of bat species in the Nietoperek tunnels in Poland.

While working on these bat projects, various bat detection equipment has been used such as heterodyne, full spectrum and time expansion units. Endoscopes, infra-red cameras and trapping equipment are some of the technology used for executing bat surveys.

She has held a bat survey licences for 15 years and currently holds a bat derogation licence, a licence to capture and a photographic licence for all bat species from National Parks and Wildlife Service.

3.0 Methodology

- Liaison with Paul Doherty Architects Ltd, and Donegal County Council.
- Site visit and walkover surveys on 12 June 2024 and 17 April 2025.
- Bird and Bat surveys Autumn 2024 – Spring 2025
- Desk research (list not exhaustive, see section 15 for full detail).
- Online data available on European sites and protected habitats/species as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie, including conservation objectives documents, coastal monitoring project, Sand Dunes monitoring project.
- I-Webs Data from Birdwatch Ireland.
- Online data available on protected species as held by the National Biodiversity Data Centre (NBDC) from www.biodiversityireland.ie.
- Information on www.catchments.ie and www.epa.ie with regard to water quality.
- Information on groundwater resources and groundwater quality in the area available from www.epa.ie and www.gsi.ie.

This report has been prepared using the following guidance. A full list of research sources and references can be seen in section 16.

- Dept. of Environment Heritage and Local Government (2009) Appropriate Assessment of plans and projects, Guidance for planning authorities.
- European Commission Environment DG (2001) Assessment of plans and projects significantly affecting Natura 2000 sites
- DoEHLG Circular NPWS 1/10 & PSSP 2/10 Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities;
- DoEHLG (2010) Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Department of the Environmental Heritage and Local Government;
- European Commission (2021) Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Brussels, 28.9.2021C (2021) 6913 Final;
- European Commission (2019) Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. (2019/C 33/01);

- OPR Practice Note (March 2021) Appropriate Assessment Screening for Development Management.

4.0 Overview of project proposals

Fáilte Ireland’s capital investment programme, Platforms for Growth explicitly targets ‘platforms’ or project types that have the greatest potential to grow tourism across Ireland throughout the year.

The second Platform for Growth, launched in January 2020, focuses on developing water sports activity facilities across the country by significantly improving the visitor experience. Facilities will include changing areas, hot showers, toilets, secure storage for personal belongings, and external showers. An Accessible Washroom and a Changing Places Toilet are also provided, see figure 4.1.

Donegal County Council is applying for Planning Permission for one of these facilities at Tullan Strand, Bundoran. The proposed development consists of the construction of a facility centre for water sports activities, associated infrastructure and an accessible pathway to Tullan Strand beach to enhance visitor management and experience. The proposed works will include construction of a purpose-built single storey facility with accessible changing rooms, showers, a Changing Places toilet, public conveniences, storage areas, associated external amenities, car and bus parking, seating, public realm landscaping, site drainage, wastewater pumping station, connection to existing utilities (waste water will be pumped south to the existing services, surface water will be treated with a hydrocarbon trap and percolate using SuDs) , supporting ancillary works, accommodation works, closure and decommissioning of the existing unauthorised beach access development, construction of a pedestrian pathway along a section of the L-1058-0 Tullan Strand Road, an accessible pedestrian/equestrian pathway/boardwalk onto Tullan Strand beach and an emergency vehicle access route towards Tullan Strand beach.



Figure 4.1 Visual of Tullan Strand Platform for Growth facility as supplied by Paul Doherty Architects Ltd.

5.0 Overview of Natura 2000 sites

5.1 Zone of influence

The approach to screening is likely to differ somewhat for plans and projects, depending on scale and on the likely effects and should include any Natura 2000 sites within the likely zone of impact of the plan or project. The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the QIs/SCIs of a Natura 2000 site. This

should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km) (OPR, 2021).

The Natura 2000 Sites have been assessed in terms of whether a Source - Pathway - Receptor relationship exists, and screened out accordingly. Where no source - pathway- receptor relationship is considered to exist these Natura 2000 sites are screened out and will not be discussed further in this report.

Donegal Bay SPA is in close proximity to the development site, see fig 5.1, and has been screened in for further assessment, a site synopses can be seen in appendix 1. All other Natura sites have been screened out due to the size, scale and type of project, the types of qualifying interest involved and their distances from the project. A Source – Pathway- Receptor relationship is not considered to exist with any other Natura 20000 site, see appendix 2.



Figure 5.1 Project location in relation to Donegal Bay SPA.

5.2 Summary of Natura 2000 sites

Detailed site synopses can be seen in Appendix 1.

Donegal Bay SPA is approximately 15 km along its north-east/ south-west axis, with a width of 3 km to over 8 km. It provides extensive habitat for waterfowl. The inner bay has numerous small, grassy islands and areas of salt marsh. It has a diversity of marine biotopes and supports a range of macroinvertebrates and bivalves. Much of the shoreline is rocky or stony which varies from well-developed littoral reefs to shingle or cobble beaches. Donegal Bay supports an excellent diversity of wintering water-birds, especially species associated with shallow bays, it is considered to be of high ornithological importance. Two species have populations of

international importance (Great Northern Diver and Light-bellied Brent Goose) and a further two species have populations of national importance (Common Scoter and Sanderling).

Conservation Objectives

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. A site-specific conservation objective aims to define favourable conservation condition for a particular habitat or species at that site.

Favourable Conservation Status is defined by Articles 1(e) and 1(i) of the Habitats Directive as follows:

"The conservation status of a natural habitat is the sum of the influences acting on it and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species. The conservation status of a natural habitat will be taken as favourable when:

- *its natural range and areas it covers within that range are stable or increasing; and*
- *the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and*
- *the conservation status of its typical species is favourable'.*

The conservation status of a species is the sum of the influences acting on the species that may affect the long-term distribution and abundance of its populations. The conservation status will be taken as 'favourable' when:

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

Conservation objectives for Donegal SPA (004151):

Objective 1: To maintain the favourable conservation condition of Great Northern Diver, Light-bellied Brent Goose, Common Scooter and Sanderling in Donegal Bay SPA.

Objective 2: To maintain the favourable conservation condition of the wetland habitat in Donegal Bay SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.

5.3 Other plans/projects

5.3.1 The Wildlife Acts 1976 to 2021

The Wildlife Act is the principal national legislation providing for the protection of wildlife and the control of some activities that may have a negative effect on wildlife. The Wildlife (Amendment) Act 2000 strengthened the 1976 Act by, among other things, giving statutory protection to Natural Heritage Areas, improving existing measures to enhance protection of wildlife species and their habitats (e.g. fish and aquatic invertebrate species, hedgerow cutting) and strengthening the protective regime for Special Areas of Conservation (SACs).

The conservation of biodiversity in Ireland has been strengthened and expanded by EU law including the Water Framework Directive, the Birds Directive and the Habitats Directive.

5.3.2 County Donegal Development Plan 2024 - 2030

Policy BIO P-1 of the County Donegal Development Plan 2024 – 2030 States the following:

It is a policy of the Council “...To require all developments to comply with the requirements of the EU **Habitats Directive and EU Bird Directive**, including ensuring that development proposals:

a. Do not adversely affect the integrity of any European/Natura 2000 site (i.e. Special Areas of Conservation and Special Protection Areas) including effects on ex-situ but functionally linked habitats, and species (e.g. Pearl Mussel) save where a plan must be carried out for imperative reasons of overriding public interest (IROPI).

b. Provide for the protection of animal and plant species listed in Annex IV of the EU Habitats Directive and the Flora Protection Order.

c. Protect and enhance features of the landscape (such as rivers, riverbanks, field boundaries, ponds and small woods) which are of major importance for wild fauna and flora and the ecological coherence of the Natura 2000 network....”

Any existing/proposed plan or project that could potentially affect Natura 2000 sites, in combination with the proposed development, must adhere to this environmental policy. Any projects or plans within the zone of influence of the project will be required to carry out Stage 1 and/or Stage 2 of the Appropriate Assessment process thereby ensuring protection of Natura 2000 sites.

The National Planning and Housing Development Database was accessed; at the time of writing there was one live planning application pending within the immediate vicinity of the project locations. Recent planning permissions can be seen in appendix 3, these have mainly been a single dwelling and alterations / extensions to existing buildings. One application pertaining to the development of a new dwelling and access for the development of 7 dwellings in the future is currently with ACP for consideration on appeal.

Bundoran Area Plan

The Bundoran Area Plan is set within the County Development Plan.

Objective:

BN-CZ-O-1 To protect and enhance the character, setting and natural heritage of the coastal zone in Bundoran, which is identified as a High Amenity Area on the Bundoran Land-Use Zoning Map, in order to secure its existing and future amenity, and tourism and ecological value.

Policies:

BN-CZ-P-1 To support the principle of the following development proposals within the High Amenity Area along the seafront, subject to compliance with all other relevant policies of this Plan and the County Development Plan:

- a. The redevelopment of brownfield sites.
- b. Development ancillary to existing established uses that support the tourism product in Bundoran.
- c. Small-scale tourism development.
- d. Public realm interventions that serve to enhance the streetscape/landscape and offer demonstrable amenity value.
- e. Community-based recreation projects.
- f. The development of marinas, jetties, facilities for outdoor water-based activities and harbour facilities for maritime leisure developments.

Proposals shall only be permitted where they:

- a. would not significantly impact on the visual amenities, character and environmental quality of the High Amenity Area.
- b. would not intrude significantly on seaward views.
- c. are of a scale and character appropriate to the host environment and are of an enduring high-quality design.

BN-CZ-P-2 To protect the coastal walkways in Bundoran as important tourism, recreation and amenity resources for the town.

BN-CZ-P-3 To ensure that development proposals that would have a negative impact on the use of pier facilities by the Bundoran Lifeboat Station shall not be permitted.

BN-CZ-P-4: To ensure that any future development or expansion of the golf course at Bundoran respects the landscape character and visual sensitivity of its coastal location and has due regard to the natural heritage of the area.

5.3.3 Water Framework Directive

The Water Framework Directive (WFD) obliges member states to manage their waters in an integrated and sustainable way. They must ensure that their waters achieve at least good status, generally by 2027 at the latest, and that current status doesn't deteriorate in any waters. To achieve good status and preserve the best waters, management plans have been prepared for districts around the country. Relevant projects underway as part of the implementation of this plan include:

Environmental Protection Agency (EPA) Monitoring Programme. The EPA is responsible for the monitoring of water quality around the country. Both chemical and ecological monitoring is undertaken by the EPA to ascertain water quality status.

5.3.4 International Union for the Conservation of Nature and Natural Resources (IUCN) Red Data Lists

IUCN Red Data Lists are a very important resource for conservation and protection of species and their habitats. Red Lists identify which species are in most danger, and categorise threatened species as follows: critically endangered (CR), endangered (EN), vulnerable (VU), near threatened (NT) or least concern (LC). Red lists are an internationally recognized system for highlighting species in danger.

5.3.5 Ramsar Sites

The Ramsar Convention is an international agreement for the conservation and wise use of wetlands. It is also known as the Convention on Wetlands and it is named after the city of Ramsar in Iran, where the Convention was signed in 1971. The Ramsar Convention (2010) defines wetlands as:

“ areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres.”

6.0 Site description

A walkover survey of the site was undertaken on the 12 June 2024 by Jessica Devlin MSc. This was an assessment of the ecological features present, or potentially present, within a site and its surrounding area (the zone of influence) in relation to the project. On this occasion this incorporated a desk study and walkover survey. All habitat types were classified using the Guide to Habitats in Ireland (Fossitt, 2000), see fig 6.1. The

objective of the survey was to scope out the site and to determine where the focus of any additional assessment should be.

The project location is in an area of coarse loamy drift with igneous and metamorphic stones known as the Ballywilliam soil series and sand dune habitat. The location of the proposed facility is in the north eastern corner of 2 agricultural fields which are used for grazing cattle and are spread with manure (GA1 Improved agricultural grassland). There was very little sward evident in the fields with Rye-grasses (*Lolium spp.*), Ribwort Plantain (*Plantago lanceolat*), Lesser Celandine (*Ficaria verna ssp verna*), Daisy (*Bellis perennis*) and docks (*Rumex spp.*) occurring occasionally. The northernmost field is quite poached by cattle, is uneven with bare soil in places. It is bound by stone walls which are low or collapsed (BL1 Stone banks and other stonework) and post and wire fencing. The fields are divided by a low stone wall. The southernmost field section has hard ground with stone in a small area beside the road, otherwise is flat and grassy, it is bound by stonewalls and wooden fencing, see plates 1-3. The waste water from the facility will be piped southward across two more agricultural fields of the same habitat. The fields are located above the cliffs with a wide view of the Bay, and could be suitable hinterland habitat for grazing waterbirds. The popular Rougey coastal walk runs along the northern corner of the facility site and the local Tullan Strand Road runs along the eastern side of the development site (BL3 Buildings and artificial surfaces). There is public lighting along both of these routes.

The footpath improvements and car parking realignment will be along the existing footpath/road and in the existing car park (BL3 Buildings and artificial surfaces), see plate 4.

The new footpath will follow the line of the existing road above the cliff along the road verge (GS2 dry meadows and grassy verges), and scrub (WS1 Scrub). The path will then enter into the farmland (GA1 Improved agricultural grassland) beside the existing cattle crush and agricultural track (BL3 Buildings and artificial surfaces). This field is grazed by cattle which are over wintered and fed on site; the ground is heavily grazed and poached in areas. An area of exposed sand (ED1) is evident around the cattle access to the stream. see plates 7-10. There is an established agricultural track through the field which defines the extent of the proposed works. The path continues behind the dunes (CD3* Fixed dunes corresponding to Annex I fixed coastal dunes with herbaceous vegetation (“grey dunes”) (2130)). The boardwalk section will go across a small section of the fixed dunes* and will bridge across the Bradoge Stream (FW2 Depositing/lowland rivers) and along the mobile dunes (CD2 Marram dunes corresponding to Annex I shifting dunes along the shoreline with *Ammophila arenaria* (“white dunes”) (2120)) and embryonic dunes (CD1 Embryonic Dunes Corresponding to the Annex I embryonic shifting dunes (2110)) until it reaches the beach, LS2 sandy shore, which grades to LS3 Muddy sand shores. The stream is a small spate stream and was completely dry on the site visit, but is known to swell and can be deep on occasion.

The public drainage system is already in place along the roads and existing paths. There were no open drains evident at the facility site or along the new access route and boardwalk. Surface water percolates to ground at these locations. The existing wastewater treatment services are c. 300m to the south of the project.

The existing unauthorised access has been broken through the cliff rock face (CS3 sedimentary Cliff), see plate 11 and 12.



Plate 1. Looking south from northern side of the facility site. Location of facility building.



Plate 2. Looking south east across facility site.



Plate 3. Looking northwest at southernmost field boundary with northern field. Location of additional car parking.



Plate 4. Looking east along existing road, and location of footpath improvements and realignment of car park on left hand side of picture.



Plate 5. Looking east along existing road: location of new footpath.



Plate 6. Looking east at existing farm track and cattle crush.



Plate 7. Looking east across the proposed site for the new path, existing track cattle crush on the rhs of the picture



Plate 8. Looking south west across proposed location for new 'zig zag' path. Existing track can be seen on upper LHS of picture.



Plate 9. Looking east across project site from fixed dune* habitat: exposed sand and erosion where proposed path and existing agricultural track meet boardwalk (LHS of picture).



Plate 10. Looking northwest from fixed dune, across the Bradoge stream across to embryonic and mobile dunes: Site for proposed bridge and boardwalk onto the beach.



Plate 11. Looking northeast. Top of existing access to be blocked off with stones/embankment and fence.



Plate 12. Looking southwest. Bottom of existing access to be blocked off with stones.

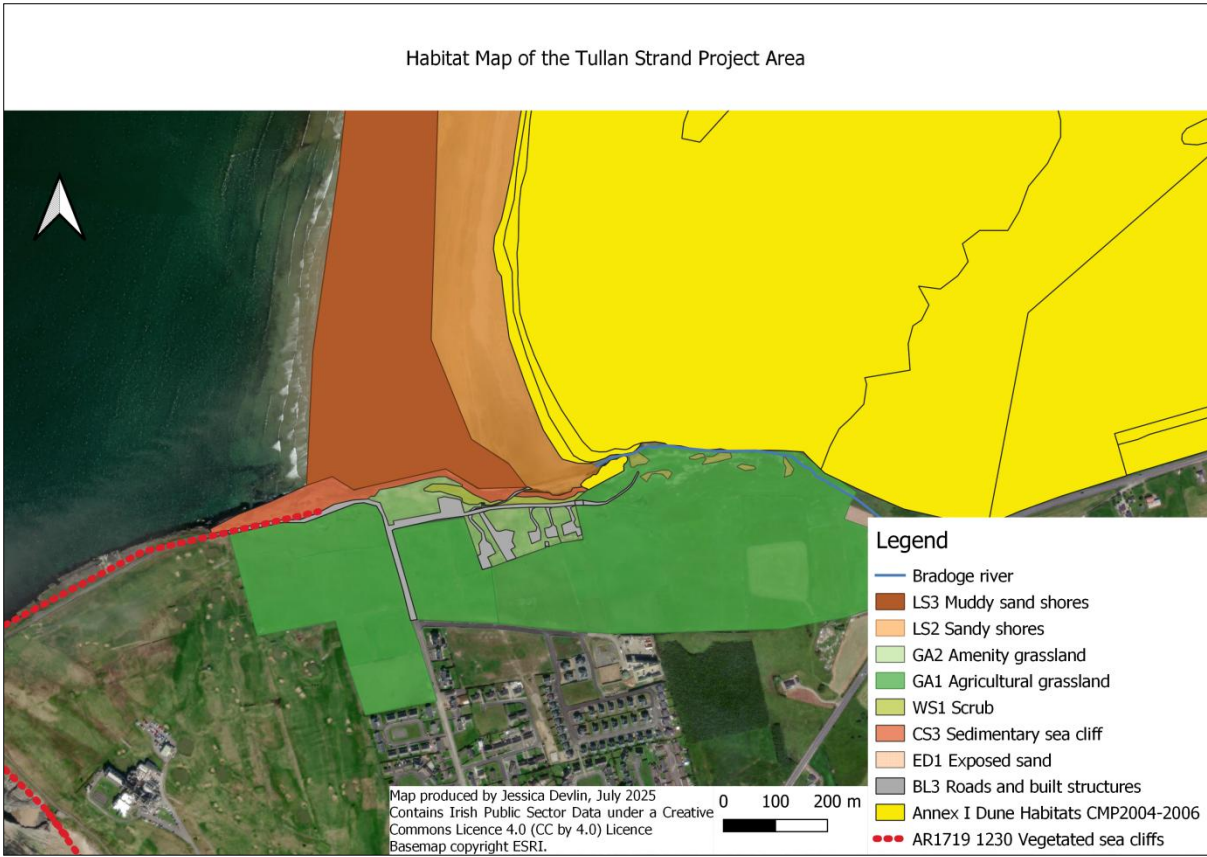


Figure 6.1 Habitat map of project area and surrounds, including Article 17 and coastal monitoring project data.

6.1 Hydrology

The Bradoge river is a small stream/drain that enters the sea at Tullan Strand, see figure 6.2. According the EPA website, www.catchments.ie, the coastal water quality status in Donegal Bay and Bundoran Bay is currently High status. The water quality of the Bradoge is Good. The Drowes is classed as Good. Groundwater is classified as good.



Figure 6.2. River network and water quality in the Bundoran area. (Map source catchments.ie accessed 22 April 2025, © ESRI, © OSI)

7.0 Detailed project proposals as provided by Paul Doherty Architects Ltd.

Fáilte Ireland has developed a universal and standardised design for all of the Activity Facility Centres delivered under the Platform For Growth Schemes which can be adapted to suit individual location and site specifications.

The facilities at Tullan Strand include showers, toilets, seating, foot washing, a water font, lockers and 2 plant rooms. The area round the facility will be paved.

Additional parking will be provided. The car park will be buffered using excavated material to create mounds that will be planted in keeping with the local environment.

Surface water will be captured by a drainage system and directed via an oil/grit interceptor to a percolation area behind the building.

Foul services and a pumping station will be installed and wastewater and grey water will be piped c.300m south to connect to the existing public network at Tullan Strand Road.

Footpaths toward the beach will be upgraded and the existing car park realigned to make better use of space.

A new path will be established along the existing road verge and through agricultural land behind the dunes. A new boardwalk will be built through the dunes, across the Bradoghe River and onto the beach. The path and boardwalk will facilitate the passage of horses and pedestrians. An emergency vehicle access will also be established along the existing agricultural access road.

7.1 Method statement

Extract from CEMP; a full description of the project and methods during construction and operation can be seen in the CEMP.

7.1.1 Site preparation

Facility Building for Water Sports

The ground conditions in this area are primarily a layer of top soil and earth material on a shallow bedrock.

The groundworks will include the removal of the topsoil down to solid sub strata and the stoning of same to provide for the car parking area and public realm area and laying of a concrete raft foundation for the building.

Installation of infrastructure for services. i.e. surface water drainage, foul water drainage, water mains and electricity supply, hydrocarbon & silt traps, stormwater attenuation.

Construction of concrete base raft foundations and construction thereafter of cast in situ / precast concrete frame and single pitch roof.

Improved footpaths and realignment of the existing Car Park

The works in this area will involve the upgrade of the existing footpath and realignment of the entrances to the existing car park and realignment of the existing car park spaces to take account of the widened footpath along the road edge.

The works in this area require minimal new work and primarily require improved alignment and improved entrances to the existing car park area from the public road.

Walkway & Pathway form the public road down to the Beach

Works in this area require the construction of an accessible pathway meeting all accessibility requirements from the public road through and over an area of existing agricultural land, across a footbridge to a small stream and a boardwalk set on top of sand dunes to the flat section of the beach.

The construction of a paved roadway to allow for emergency access vehicles to a turning point adjoining the pathway to the beach and construction of a cattle crush to replace a cattle crush to be removed at the current entrance to these lands and the construction of a natural stone-faced wall as a new boundary between the path and roadway and the remainder of the third party agricultural lands.

7.1.2 Construction

Facility Building for Water Sports

Excavation of existing topsoil inert material and movement of the material within the site to form mounding around the car park. No material is to be moved off site and all access material is to be reused in the mounding around the car park area.

Excavation of trenches and foundations and the installation of service pipe network, pumping station and stormwater soakaway, with oil/grit interceptor and installation of electrical and telecom services from the adjoining road to the building.

Pouring of concrete foundations and installation of cast in situ or precast structural columns posts and roof and building completion to include the installation of toilets, showers, plant room and all necessary utilities and services.

Hard landscaping to the public realm area to include provision of seating, paving, way signage for the building (to include a standalone totem sign) and any necessary boundary treatments.

Improved footpaths and realignment of the existing Car Park

Alterations to the existing footpath and car park primarily within the existing stone base area of the existing footpath and car park to include revised entrances and crossing bays adjoining the public road.

Walkway & Pathway from the public road down to the Beach

Excavation to solid strata and the construction of a hard finish footpath and hard finish emergency vehicle only access roadway.

Boardwalk and bridleway construction: The proposed elevated structure will be constructed on Fibre Reinforced Polymer (FRP)/ timber driven piled foundations. The elements of the structure will be constructed from FRP/timber which will be manufactured offsite and transported to the field at the eastern end of the boardwalk. The weight of all elements will be limited to what can be transported manually. Piles will be carried into place and installed using hand portable equipment. FRP/timber beams, decking planks and handrails will then be assembled in place using hand portable equipment. The constructed portion of the boardwalk will be used to move FRP elements across the dune habitat as the works advance.

Erection of split hazel fencing around the dunes and construction of a natural stone-faced wall to form a new boundary between the joining agricultural lands and the lands to be transferred to Donegal County Council to accommodate the roadway and the pathway.

Old Access

The existing access will be closed off at the top by placing rocks/earth embankment and a fence. Rocks will also be placed at the bottom to stop people walking up and down.

8.0 Assessment of project proposal in terms of potential direct, indirect or cumulative impacts on Natura 2000 Sites.

Table 8.1 explores where there may be potential for the project to impact Natura 2000 Sites and their qualifying interests.

Attribute	Description	Potential Impact to Natura 2000 site?
Size & Scale	Facility and additional parking c.1acre, path and boardwalk 0.46acres (796m long).	No impact.
Natura 2000 Land take	No land take	No impact.
Distance from the Natura 2000 site or key features of the site	18m from the boundary of Donegal SPA at closest point.	Potential direct and indirect impacts: Potential for run-off and pollution from development.
Resource requirements (water abstraction etc.)	None.	Disturbance to SCI species and potential loss of hinterland habitat.
Emissions (disposal to land, water, or air)	Noise emissions. Construction emissions. Operation: Surface water, lighting	
Excavation requirements	Site preparation, excavation and resurfacing.	
Transportation requirements	Lorries and excavators for delivery and works.	
Duration of construction, operation etc.	Short duration. No change in current use of the area.	Once works are complete there will be no significant change in operational activity/use at the site.

Table 8.1. Project activity and the potential direct, indirect and in combination impacts it may have.

9.0 Assessment of significance

As discussed in section 8, there is potential for the project to impact on Donegal Bay SPA.

Table 9.1 explores further the likely significance of the project and the potential impacts identified, in terms of disturbance to key species, habitat or species fragmentation, reduction in species density and changes in key indicators of conservation value, i.e. water quality.

9.1 Assessment of project proposal in terms of habitat loss, disturbance, fragmentation or reduction in species density:

Natura 2000 site & Qualifying Interest	Potential impacts from the proposed development on the integrity of the Natura 2000 site, individually or in combination with other projects	Significance of Impact
<p>Donegal Bay SPA (004151) Qualifying Interests:</p> <p>Great Northern Diver (Gavia immer) [A003]</p> <p>Light-bellied Brent Goose (Branta bernicla hrota) [A046]</p> <p>Common Scoter (Melanitta nigra) [A065]</p> <p>Sanderling (Calidris alba) [A144]</p> <p>Wetland and Waterbirds [A999]</p>	<p>Direct loss of habitat</p> <p>There will be no direct loss of habitat within the Natura 2000 sites.</p> <p>Indirect loss of habitat: A species may stop using a habitat due to increased disturbance or habitat degradation on site.</p> <p>Habitat degradation due to hydrological impacts via surface water. Though the project is small size and scale potential for significant effects cannot be ruled out.</p> <p>Water quality:</p> <p>The construction period of the proposed development poses some risk to the surrounding environment in terms of pollution run off into Donegal Bay which could cause direct impacts to birds e.g oil on plumage, and indirect impacts to feeding sources e.g. killing prey or contamination.</p> <p>Operation:</p> <p>After passing through an oil/grit interceptor, surface water from the new car park will percolate to ground via a soak-away. Elsewhere along the path the existing drainage system will be used. Surface water from the new access road will percolate to ground. There will be no impact from this during the operational phase.</p> <p>Grey water and waste water will be pumped to the existing mains waste water treatment system.</p> <p>Habitat degradation due to the introduction of Invasive Alien Plant Species.</p>	<p>No impact.</p> <p>No potential for significant effects.</p> <p>Potential to impact. Potential for significant effects.</p>
	<p>Disturbance / Displacement:</p> <p>Noise and visual disturbance:</p> <p>Waterbirds: Donegal Bay is designated for a number of</p>	<p>Potential to impact</p> <p>Potential for significant effects.</p>

Natura 2000 site & Qualifying Interest	Potential impacts from the proposed development on the integrity of the Natura 2000 site, individually or in combination with other projects	Significance of Impact
	<p><u>wintering</u> waterbirds.</p> <p>Construction:</p> <p>Buffer zones indicate the potential range of distances to protect the majority of birds from human disturbance. For some geese and diver species, suggested buffer zones range from 200 to 1000m. Other waterbird species are less sensitive, with suggested buffer zones ranging between 200m and 600m (Goodship <i>et al.</i>, 2022). The proposed development is within 18m of Donegal Bay SPA at its closest point; While the construction phase will be short and the project is small scale, it may create noise and cause disturbance or displacement of bird species in Donegal Bay SPA. It may disturb birds if they are using the hinterland habitats at the site location.</p> <p>Operation:</p> <p>Hinterland habitat may be lost due to the footprint of the project.</p>	
	<p>Habitat or Species fragmentation</p> <p>The location of the facilities may cause species to avoid using preferred hinterland habitat.</p>	<p>Potential Impact.</p> <p>Potential for significant effects.</p>
	<p>Reduction in Species Density</p> <p>It has been demonstrated in the discussion above in terms of hydrological impacts and displacement or disturbance to feeding, resting and breeding areas there is potential for a direct and indirect impacts during construction if pollutants were to be released into the Bay. The agricultural fields at the site for which the facility is proposed, may have potential as hinterland habitat for SCI birds e.g. Light Bellied Brent Geese. This could cause a reduction in species density if sensitive birds were injured or unable to feed before moving on in the spring.</p>	<p>Potential to Impact.</p> <p>Potential for significant effects.</p>
	<p>In combination: At the time of writing there was one live planning application pending within 500m of the project location, this is being assessed by ACP on appeal with a decision due date of 2022. A NIS has been completed for the application.</p> <p>Previous projects granted permission from the past decade include small scale projects: signage, extensions and modifications to existing buildings, change of use, glamping pods, demolition and replacement of a dwelling, and two</p>	<p>In-combination effects unlikely, but should be explored further.</p>

Natura 2000 site & Qualifying Interest	Potential impacts from the proposed development on the integrity of the Natura 2000 site, individually or in combination with other projects	Significance of Impact
	<p>garage constructions, Details of planning permissions can be seen in appendix 3. Any other future projects will be subject to Appropriate Assessment.</p> <p>Plans relevant to the project are the County Development Plan 2004-2030 which contains the Bundoran Area Plan.</p>	

Table 9.1. Likely significance of impacts.

9.2 In-combination Impacts

The potential for in-combination effects to arise from the project proposal is regulated and controlled by the environmental policies and objectives of the Donegal County Council Development Plan 2024 – 2030.

Any existing/proposed plan or project that could potentially affect Natura 2000 sites, in-combination with the proposed development, must adhere to the overarching environmental policies of the County Development Plan and Local Area Plans. These policies will ensure the protection of the Natura 2000 sites within the zone of influence of the proposed project and include the requirement for any future plans or projects to undergo Screening for Appropriate Assessment and/or Appropriate Assessment (NIS) to examine and assess their effects on Natura 2000 sites, alone and in combination with other plans and projects.

Details of planning permissions over the past decade can be seen in Appendix 3; previous projects that have been granted permission include small scale projects: signage, extensions and modifications to existing buildings, change of use, glamping pods, demolition and replacement of a dwelling, and two garage constructions. At the time of writing there was one live planning application pending within 500m of the project location, this is being assessed by ACP on appeal with a decision due date of 2022. A NIS has been completed for the application.

A Natura Impact Report of the County Development Plan which includes the Bundoran Area Plan was carried out and it concluded that it is not foreseen to give rise to any adverse effects on the integrity of Natura Sites, alone or in combination with other plans or projects. The Plan has been formulated to ensure that uses, development and effects arising from developments, based upon the Plan (either individually or in combination with other plans or projects) shall not give rise to significant adverse impacts on the integrity of any Natura 2000 site.

The Strategic Environmental Assessment of the Plan was also carried out. The SEA process ensured that environmental considerations were suitably incorporated into the Plan as adopted. This SEA process will continue with the monitoring of environmental impacts of the implementation of the Plan. This will include ongoing monitoring and the carrying out of a progress report on the implementation of the Plan.

It has been demonstrated that there is potential for the project to cause effects due to its proximity to Donegal Bay SPA, therefore though the project is small scale the precautionary principle has been taken, and in-combination effects cannot be ruled out at this stage.

10.0 Conclusion of SCREENING

Donegal County Council is applying for planning permission for the development of a facility centre for watersports activities and footpath and new access routes to Tullan strand, including additional car parking and associated site works.

The project proposal has been assessed in terms of the likely impacts the proposal may have on the Natura 2000 sites in the area. The significance of impacts identified (if any) has been determined. It has been determined that the project does pose a risk to the marine and coastal environment and Donegal Bay SPA.

Potential effects were identified as:

- Habitat degradation due to hydrological impacts via surface water: Deterioration of water quality caused by run-off and pollution, during construction, that may lead to Donegal Bay.
- Habitat degradation due to the introduction of Invasive Alien Plant Species.
- Habitat degradation due to noise and disturbance: it is uncertain whether waterbird species (including Light-bellied Brent Goose) may at times use habitats situated within the immediate hinterland of Donegal Bay SPA or in areas ecologically connected to it.
- Habitat fragmentation: The location of the facilities may block or cause species to avoid using preferred hinterland habitat.
- Reduction in species density if SCI birds were injured or unable to feed and
- In combination effects

This section of the report presents a Stage 1 Appropriate Assessment Screening outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the project, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any Natura 2000 site.

The Competent Authority has been provided with information to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant Natura 2000 sites, the Project, individually or in combination with other plans or projects is likely to have a significant effect on any Natura 2000 site.

It can be objectively concluded that there is a possibility of significant impacts on Donegal Bay SPA, its features of interest and site specific conservation objectives.

Stage 2 of the Appropriate Assessment process (Natura Impact Statement) is required.

In light of the findings of the Screening Assessment winter bird surveys and breeding bird surveys were carried out over the 2024 /2025 season to remove any uncertainty and to enable further assessment of the likely impacts of the project. Assessment of mitigation measures has also been undertaken.

11.0 NATURA IMPACT STATEMENT

This section of the report has been compiled to provide the competent authority with adequate information to make an Appropriate Assessment (AA) of the Project under Article 6(3) of the Habitat Directive. The NIS will assist ACP in determining whether or not the proposed development will adversely affect the integrity of any Natura 2000 sites, either alone or in combination with other plans and projects, taking into account their conservation objectives. The report should be read in conjunction with the previous sections 1-10, and drawings submitted with the planning application.

The purpose of this NIS is to provide an examination, analysis and evaluation of the potential impacts of the proposed development on Natura 2000 sites and to present findings and conclusions with respect to the proposed development in light of the best scientific knowledge in the field.

It considers the implications of the proposed development, on its own and in combination with other plans or projects, for Natura 2000 sites in view of the conservation objectives of those sites. It includes a scientific examination of evidence and data to identify and assess the implications of the proposed development for any Natura 2000 sites in view of the conservation objectives of those sites. It considers whether the proposed development, by itself and in combination with other plans or projects, would adversely affect the integrity of Natura 2000 sites. In reaching a conclusion in this regard, consideration is given to any mitigation measures necessary to avoid or reduce any potential negative impacts.

The project proposal has been assessed in the Screening process in terms of the likely impacts the proposal may have, before mitigation, on the Natura 2000 sites in the area. The significance of impacts identified has been determined. The assessment undertaken in terms of the proposed development concludes that there is potential for the project to significantly impact on Donegal Bay SPA (004151), resulting in effects on [A003] Great Northern Diver *Gavia immer* (wintering), [A046] Light-bellied Brent Goose *Branta bernicla hrota* (wintering), [A065] Common Scoter *Melanitta nigra* (wintering), [A144] Sanderling *Calidris alba* (wintering), [A999] Wetlands.

In light of the findings of the Screening Assessment winter bird surveys and breeding bird surveys were carried out over the 2024 /2025 season to remove any uncertainty and to enable further assessment of the likely impacts of the project. Assessment of mitigation measures has also been undertaken.

12.0 Field Surveys

In 2020-2021 Fáilte Ireland appointed CAAS Ltd. to undertake winter bird surveys at Tullan Strand. Due to the time between the surveys and the projects planning application in 2026, it was thought prudent to resurvey in the 2024-25 survey period. The survey area was also adjusted to reflect the current proposal. Data from both survey periods has been considered in this assessment. Breeding bird surveys were undertaken in March, April and May, these are discussed in a separate Ecological Impact Assessment for the site. No breeding waders were recorded within or adjacent to the Project site during the breeding bird surveys. This report discusses the winter surveys only.

2020-21 surveys took place over a 5 month survey period (November to March) specific detail regarding times and conditions was not available. The survey area did not include much of the boardwalk field and included a greater sea and beach area than that surveyed in 2024-25.

The 2024-2025 winter bird surveys covered over >20 hours on site, across 7 months, September to March. Vantage watch surveys were completed to begin with from the car park areas, followed by a transect survey up along the stream, through the dunes, over to the b/w field, finishing with a vantage watch back up on the cliff/road/car park. Winter bird surveys were an adaptation of IWeBs methodology and took place between mid and high tide, to capture foraging and roosting birds. When a final decision was made as to the location of

the facility and the route of the path / boardwalk, survey effort was more focused on these areas. See figure 12.1 for bird survey locations.

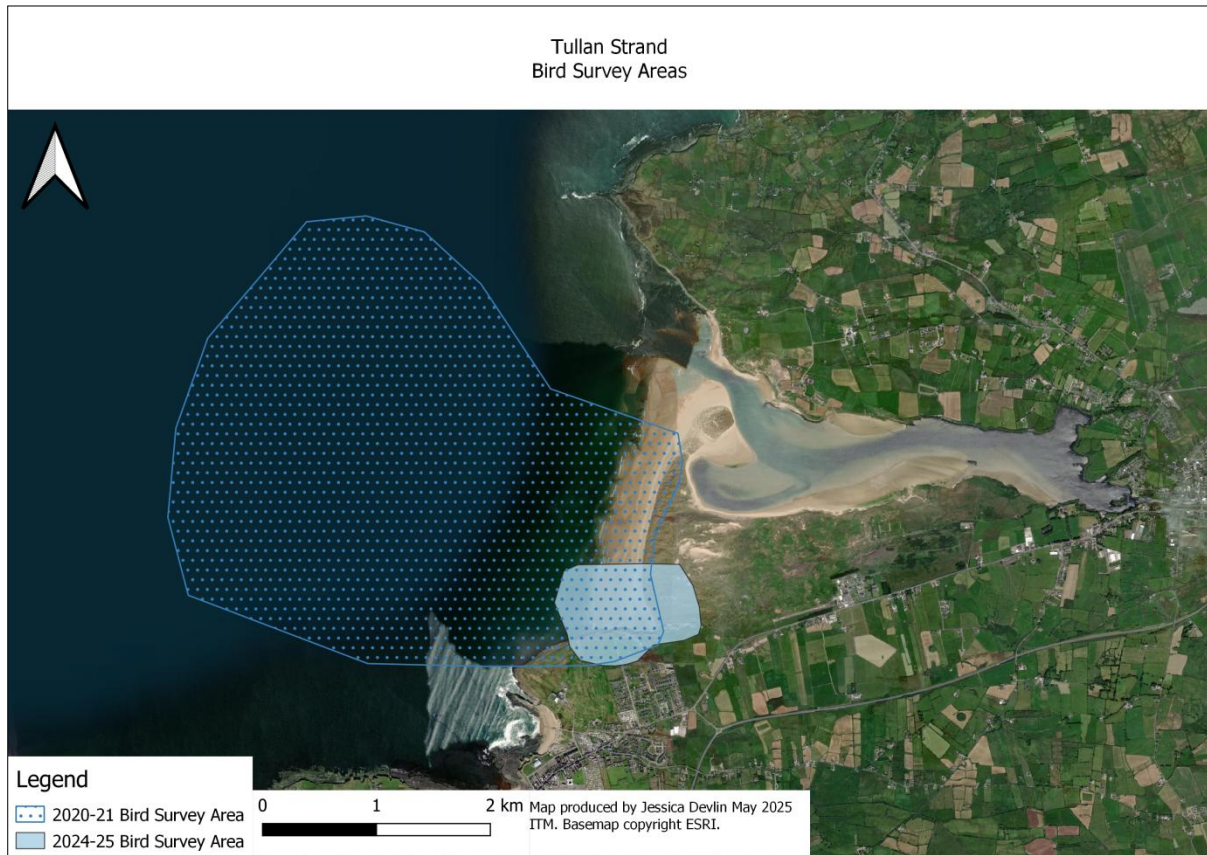


Figure 12.1 Tullan Strand 2020/21 and 2024/25 Bird Survey Areas

12.1 Survey Results

A full list of survey data including I-WeBs, 2024-25, 2020-21, along with survey dates and conditions can be seen in appendix 4, summary tables can be seen in tables 12.1 and 12.2.

2024 -25 Waterbird surveys: There were 27 bird species recorded within the study area, of these 5 were water bird species and 7 were sea bird species. 6 of which are mentioned in the ecological information of the Donegal Bay SPA documents.

2020-21 survey results are similar to the 2024-25 numbers. 12 bird species were recorded 3 waterbird species and 9 of which were sea birds. Higher numbers of coastal and sea birds including Sanderling were recorded, this would be expected given the wider beach and sea area surveyed.

Survey Year	Species	Species code	Scientific name	In SPA docs
2020/21, 2024/25	Sanderling	SS	<i>Calidris alba</i>	x
2024/25	Ringed Plover	RP	<i>Charadrius hiaticula</i>	x
2020/21, 2024/25	Oyster Catcher	OY	<i>Haematopus ostralegus</i>	x
2024/25	Turnstone	TT	<i>Arenaria interpres</i>	x
2020/21, 2024/25	Common Scoter	CX	<i>Melanitta nigra</i>	x
2020/21, 2024/25	Curlew	CU	<i>Numenius arquata</i>	x
2024/25	Black-headed Gull	BH	<i>Chroicocephalus ridibundus</i>	
2020/21, 2024/25	Common Gull	CM	<i>Larus canus</i>	
2020/21, 2024/25	Chough	CF	<i>Pyrhcorax pyrrhcorax</i>	
2020/21, 2024/25	Herring gull	HG	<i>Larus argentatus</i>	
2020/21, 2024/25	Great Black- backed gull	GB	<i>Larus marinus</i>	
2024/25	Gannett	GX	<i>Morus bassana</i>	
2020/21	Guillemot	GU	<i>Uria aalge</i>	
2020/21	Cormorant	CA	<i>Phalacrocorax carbo</i>	
2020/21	Lesser black-backed gull	LB	<i>Larus fuscus</i>	
2020/21	Razorbill	RA	<i>Alca torda</i>	
2020/21	Shag	SA	<i>Phalacrocorax aristotelis</i>	

Table 12.1 Water Bird species recorded in the 2020 - 2021 and 2024 – 2025 surveys.

SCI species in yellow.

Species	code	max wintering count 2020-21	max wintering count 2024-25	IWeBs Mean over 8 yrs	IWebs Overall peak over 8 yrs	Numbers in SPA docs	SPA SCI Y/N	AllIreland_1pc	Flyway_1pc	Conservation status
Sanderling	SS	167	61	18	82	68	Y	85	2000	Green
Ringed Plover	RP	-	2	34	50	99	N	120	540	Amber
Common Gull	CM	56	90	71	147	297	N	-	-	Amber
Oyster Catcher	OY	67	30	118	154	581	N	610	8200	Red
Chough	CF	8	6	-	-	-	N	-	-	Amber
Turnstone	TT	-	3	48	77	53	N	95	1400	Amber
Herring gull	HG	30	4	159	341	-	N	-	-	Amber
Great Black-backed gull	GB	6	8	8	21	-	N	-	-	Green
Common Scoter	CX	12	60	124	270	860	Y	110	7500	Red
Gannett	GX	-	9	-	-	-	N	-	-	Amber
Curlew	CU	72	19	38	68	359	N	350	7600	Red
Black-headed Gull	BH	-	1	24	65	-	N	-	-	Amber
Guillemot	GU	132	-	-	-	-	N	-	-	Amber
Cormorant	CA	5	-	-	-	-	N	-	-	Amber
Lesser black-backed gull	LB	2	-	-	1	-	N	-	-	Amber
Razorbill	RA	95	--	-	-	-	N	-	-	Red
Shag	SA	1	-	7	17	-	N	-	-	Amber

Table 12.2 Summary of 2020-21 and 2024-25 data in comparison to Local (IWeBs) data and Regional (SPA) data, including conservation status.

SCI species in yellow

12.2 Discussion

We can take the numbers listed I-WeBS peak figures and the numbers listed in SPA documents as local and regional population figures respectively. In the IWeBS data presented for the subsite QI species are recorded across 8 years. (The IWeBS subsite is significantly larger than the study area surveyed in 2024-25).

I-Webs

On comparing the figures the numbers recorded in the 2020-21 and 2024-25 study area are generally lower than data available for the local and regional figures, with some exceptions:

2 no. bird species were present in similar numbers to local I-WeBS peak numbers in 2024-25. These species are Sanderling and the Common gull. 3 other species Oystercatcher, Curlew and Common Scoter occur in low numbers but may be significant due to the Red conservation status of these species.

In 2020-21 Sanderling and Curlew occurred in numbers similar to IWeBs peak figures. Oystercatcher numbers were also higher in the 2020-21 survey.

SPA Documents

None of the species listed in the SPA documents are present at the study area in nationally or internationally important numbers, with the exception of Sanderling in 2020-21.

During the 2020-21 and 2024-25 surveys 2 SCI species were recorded within the study areas: Sanderling and Common Scoter. Great Northern Diver and Light Bellied Brent Goose were not recorded. None of the SCI birds were recorded in or around the footprint of the project.

Red listed birds at project location

In 2024-25, 3 species; Oystercatcher, Curlew and Common Scoter occur in low numbers. Oystercatcher was recorded once in the facility field in low numbers (4). Curlew were not recorded within the footprint of the project location in the 2024-25 surveys. Common Scoter does not use hinterland habitats and was recorded at sea.

2020-21 survey data was unclear as to whether Oystercatcher and Curlew occurred in the facility field. The area of the facility field included in the GIS data was very small and only included the very southern area.

The only other red listed bird recorded during the 2020-21 survey was razorbill which is a cliff bird and was seen out in open water and would not occur at the project location.

Foraging areas

In both survey periods Sanderling were recorded on the beach around the tideline.

In both survey periods Common gull was recorded on the beach and open sea and around the tideline. It was recorded on one occasion in 2024-25 at the Boardwalk field (7).

Common Scoter as would be expected was recorded in open water. There were no records for Common Scoter in 2020-21 surveys.

Curlew (19) was recorded on one occasion in the field opposite the facility field in the 2024-25 surveys and on 3 occasions at the same location in the 2020-21 survey (17, 34, 38).

Oystercatcher (4) was recorded on one occasion in the facility field in 2024-25 survey; it was recorded along the short grass above the cliff (11) and in the field opposite the facility field (16) in the 2020-21 surveys.

Across both survey periods Oystercatcher was recorded on several occasions on the beach around the tideline and seem to favour the area around the bottom of the cliff to the west of the survey area.

Ringed plover was recorded on one occasion (2) on the beach and Turnstone (3), (1) were recorded twice using the cliff bottom. Chough (2) was recorded behind the dune area and around the cliff. It is possible there is a nesting site in the wider area.

The numbers recorded for these species are significantly lower than the local and regional SPA numbers.

Roosting

In the 2024-25 survey all roosting birds (SS, CM, OY, CU, BZ, HG, CX) were recorded in the beach and cliff areas and out to sea, with the exception of OC(25) and CU(8) which were both recorded in the field opposite the facility field on one occasion in the December survey.

The 2020-21 surveys show similar results with all roosting waterbirds on the beach and cliffs.

Summary

The ecological value of the habitat adjacent to the project area is considered regionally important to Sanderling and locally important to other waterbirds. The data suggests that the project area is not a significant hinterland habitat for birds in the area and is only used by very few birds on occasion.

13.0 Assessment of Impacts

To determine fully how the project may potentially impact the relevant qualifying interests of the Natura 2000 sites a better understanding of the species and habitats in question is required. Information has been collated from conservation objectives documents and supporting documentation, as detailed in section 16. Table 13.1 details general habitat and species requirements. The pressures and threats to these habitats and species have also been identified. The pressures and threats that the project may contribute to are highlighted in bold.

Qualifying Interests of Donegal Bay SPA with potential to be impacted	Habitat description / Species requirement	General Pressures / Threats Identified
<p>[A003] Great Northern Diver <i>Gavia immer</i> wintering</p> <p>[A046] Light-bellied Brent Goose <i>Branta bernicla hrota</i> wintering</p> <p>[A065] Common Scoter <i>Melanitta nigra</i> wintering</p> <p>[A144] Sanderling <i>Calidris alba</i> wintering</p> <p>[A999] Wetland</p>	<p><u>Great Northern Divers</u> are able to forage successfully in deeper waters and can therefore occur up to 10km offshore.</p> <p><u>Brent Geese</u> are grazers, their principal supporting habitat is Intertidal mud and Sand flats (when foraging), and they are known for their preference for foraging in intertidal areas with the Eelgrass <i>Zostera</i> sp.</p> <p>During winter and when feeding, <u>Common Scoters</u> are generally distributed in shallow coastal waters with a depth of no more than 20m. They are most often distributed across areas where there is a sandy substratum, linked to the distribution of their favoured prey of bivalve molluscs.</p> <p><u>Sanderling</u> often forage along the tide line, where they rush in and out with the waves searching for small prey, such as sandhoppers. Sanderlings are shorebirds characteristic of sandy shorelines.</p> <p>Wetland habitat is an important resource for waterbird species that make up the total waterbird assemblage. These species may include those that utilise the site during passage, those that are present in months of the year outside of the non-</p>	<p>The main threats to Waterbirds and wetlands leading to displacement and /or reduction in numbers are:</p> <p>Habitat modification: activities that modify discreet areas or the overall habitat(s) in terms of how one or more of the listed species use the site (e.g. as a feeding resource).</p> <p>Disturbance: anthropogenic disturbance that occurs in or near the site, and is either singular or cumulative in nature.</p> <p>Activities include: bait digging, aquaculture activities, walking, hand gathering of molluscs.</p> <p>Significant habitat change or increased levels of disturbance within habitats in the hinterland areas of the</p>

Qualifying Interests of Donegal Bay SPA with potential to be impacted	Habitat description / Species requirement	General Pressures / Threats Identified
	breeding season or species that use the site at certain times only (e.g. as a cold weather refuge).	SPA.

Table 13.1 Habitat and species requirements and the general pressures and threats identified.

A full suite of site specific mitigation measures are detailed in Appendix 5. **NOTE MITIGATION FOR ALL ECOLOGICAL AND NATURA 2000 aspects have been included in Appendix 5 to ensure continuity across the project.**

13.1 Habitat degradation due to hydrological impacts via surface water and groundwater.

Construction:

Emissions to air, soil and water during site preparation and construction activities: While temporary in nature, construction operations can, sometimes, result in pollution or sedimentation incidents, which can impact negatively on habitat quality. Inadvertent release of suspended solids (from excavation, movement of soils, and construction materials) and other pollutants and hydrocarbons into Donegal Bay could contribute to nutrient enrichment and sedimentation, and could also impact on the water quality.

Donegal Bay is home to wintering waterbirds. As discussed in section 12, the ecological value of the habitat adjacent to the Project area is considered regionally important to Sanderling and locally important for other SCI and wintering waterbirds, which depend on the wetland habitat and the water quality in the bay.

An acute pollution incident could have significant effects on SCI's, and other water birds potentially causing death and/or pollution and degradation of marine habitats and feeding sources.

The main pathway for transporting sediments from the development site is via storm/surface water runoff during construction. If this pathway is eliminated then this risk is reduced significantly. Other pollutants that could enter the system via percolation through soils or groundwater require careful site management, in particular hydrocarbon, fuel, chemicals and any other hazardous materials on site.

Operation:

Run off of polluted surface water from hard surfaces from the developed site could cause an ongoing source of pollution.

A malfunction of the waste water pumping system could also cause a major acute incident or a long term pollution source. All of these issues, if they were to occur individually or together could have significant effects on the Qualifying Interests causing death and /or pollution and degradation of marine habitats and feeding sources.

Mitigation Measures - Habitat degradation due to hydrological impacts via surface water and groundwater.

A full suite of mitigation measures can be seen in appendix 5. These will be integrated into the method statements prepared by the appointed contractor.

Construction & Environmental Management Plan A project-specific Construction and Environmental Management Plan (CEMP) has been developed with input from the projects' environmental consultant and is included within the planning application.

Operation includes using the existing waste water management and drainage systems. The pumping facility will have a back up and alarm system in place.

Oil grit interceptors and percolation to ground is proposed at the facility and the new car park. Interceptors are fitted with alarms and a service agreement will be in place.

Residual effects - hydrological impacts

Provided mitigation measures are implemented in full and manufacturer's guidelines are fully adhered to and implemented, the construction and operation phases of the development will not pose a risk to the conservation objectives, or the conservation condition, of the SCI's in Donegal Bay SPA. There are no residual direct or indirect impacts associated with the proposed development that could adversely affect the integrity of the SPA.

13.2 Noise and visual disturbance causing displacement of SCI species - Waterbirds

Construction

There is a high level of activity and noise on a construction site. Sources include noise and activity from excavation machinery, increased human activity during construction processes and increased traffic to and from site. All this increased activity and noise will potentially have a significant impact on species using the adjacent coastal site through indirect habitat loss caused by disturbance. Construction activity on site will not be permanent and activity levels will vary greatly during the construction period. The proposals are small size and scale. Disturbance events are temporary in nature. Sandflats and grassland area are common around the Donegal bay area, so there is ample suitable alternative habitat in the surrounding area for temporarily displaced birds. It is reasonable to assume that during periods of low or no activity on site birds will continue to use the adjacent habitat as normal. Any impact will be minor and temporary.

Operation

The activity within the completed development will be a source of disturbance; however this is not unusual for the area as it is a busy tourism destination. Findings by Torsney et al 2023, state that management practices should identify and appropriately manage the activities available at nature based destinations to reduce overall impacts. The research showed that 75% of all visitor observations resulted in no identifiable effects on the environment.

The normal intensity of activity during project operational phase will be significantly lower than that of the time-limited construction phase. The peak period of activity within the tourist facilities will be during the summer months, when the wintering water bird species will not be present, this will further reduce the significance of any potential operational phase disturbance.

There is no lighting proposed along the new access or boardwalk. Street lighting is already in place around Roughy walk and the car parking facilities.

The new access and boardwalk will control visitor and equine movements in and around the site and will deter users from tramping through the dune system by providing them with a direct, safe and accessible route. The boardwalk will direct visitors onto the same area of beach as is currently used, from a different direction.

Foraging birds: The facility field is not a favoured foraging spot. There were no SCI species recorded there during the 2020-21 and 2024-25 surveys. In the 2024-25 survey Oystercatcher were recorded on the facility field only once in low numbers (4). Other species recorded in the facility field were Rook (2), Pied wagtail (1), Jackdaw (9).

None of the SCI birds were recorded at the boardwalk field or dunes. Sanderling and Common Scoter are the only SCI birds recorded in the study area; the habitats they use are removed from the works; shore/tideline and open sea respectively.

Roosting birds: There were no roosting SCI or other birds recorded in the 2024-25 surveys at any of the project site locations (the facility field, path, b/w field or the dunes). Roosting birds were not recorded at the facility field or in the dunes during the 2020-21 survey.

The location of the facility, the path and boardwalk are set back from the SPA. Works are low impact on the beach especially the boardwalk construction and any disturbance is likely to be very localised.

It can be concluded that construction disturbance may cause a minor impact to other waterbirds and will not be permanent in nature.

It can be concluded that the project area is not an important foraging or roosting site for SCI or other water birds using the area, and is not considered significant hinterland habitat.

Areas that appear to be favoured by other water birds for foraging i.e. the beach, cliff and the field opposite the facility field are separated from the site by topography and the road and are unlikely to be impacted any more than they are now by the extension of the tourism area to the corner of the facility field. It should be noted that numbers in this area are much lower than local and regional figures.

Nevertheless the operational phase of the development could result in a minor negative impact on other waterbirds.

Mitigation Measures Noise and visual disturbance causing displacement of QI species Wildfowl Construction and Operation

In design mitigation

The location of the facility, car park, paths and boardwalk are all located outside the SPA above the cliffs, out of view of the SPA, and tucked behind the dune system thereby obscuring it from view.

The car park will have a buffer consisting of mounds of planted soil to soften the appearance and this will also serve to screen the facility and car park during operation activity.

There is no additional lighting proposed at the facility, along the path or boardwalk.

Construction:

Screening will be erected around the boundary of the construction site.

Operation:

Lighting is proposed at the new car park, this will be low level lighting, the minimum required for safety. There will be no additional lighting along the path and boardwalk. Mitigation, relating to lighting, as proposed for bats and other birds will also benefit any waterbirds using the area.

Residual Effects Noise and visual disturbance causing displacement of SCI species - Waterbirds

After mitigation measures are applied the majority of activity on site will be screened during both the construction and operational phases. Therefore the residual impact from both phases will be of negligible significance.

The birds using the site are accustomed to the activity and hustle and bustle of the busy tourism destination.

The proposed project has the potential to cause disturbance to wintering water birds in the area by indirectly reducing foraging habitat through disturbance. However, following application of the proposed mitigation measures, which have been designed to negate these effects, we can conclude that the proposed project will not result in any significant impacts on the water bird species listed as ecological features in the SPA documents.

As discussed in section 12 the project area is not used by any of the SCI SPA species. Therefore we can conclude that the proposed Project will not result in any negative impacts on the integrity of the Natura 2000 site concerned.

13.3 Habitat degradation due to the introduction or spread of the invasive alien plant species

Construction and operation

Planting, dispersing, or allowing/causing the dispersal, spread or growth of certain non-native plant species is controlled under Article 49 of the European Communities (Birds and Natural Habitats) Regulations, 2011; and refers to plant or animal species listed on the Third Schedule of those regulations.

None of the plant species on the Third Schedule were recorded within the project site, however when importing materials from outside a site there is always a risk of importing unwanted elements such as seed or spores from invasive plants for example, Japanese knotweed or Rhododendron. The accidental spread of non-native invasive plant species as a result of construction works has the potential to impact upon terrestrial habitats within and immediately adjacent to the proposed development boundary; potentially affecting plant species composition, diversity and abundance over the long-term.

The vectors and pathways by which non-native invasive species are transported are many, and result from the diverse array of human activities which operate over a range of scales. Primary introductions often result from the accidental transport, for example visiting equipment. Secondary introductions result from the expansion of a species from the initial place of establishment. Secondary spread will normally include a wider range of vectors that may act either separately or together (Stokes et al., 2004).

Invasive species can pose a risk to our ecosystems and biodiversity and are hard to remediate and eradicate.

Mitigation measures - Habitat degradation due to the introduction/spread of the invasive species

Biosecurity – Avoiding the introduction or spreading of non-native invasive plant and animal species

In order to comply with Regulations 49 and 50 of the European Communities (Birds and Natural Habitat) Regulations (2011), the appointed Contractor will ensure biosecurity measures are implemented throughout the construction phase to ensure the introduction and translocation of invasive species is prevented.

When importing materials from outside a site there is always a risk of importing unwanted elements such as seed or spores from invasive plants for example, Japanese knotweed or Rhododendron. Measures will be taken to ensure imported material is clear of contaminants and comes from a known reliable source, by using certified suppliers, requesting information on origin, carrying out visual Inspection, obtaining source certification, and independent laboratory testing if there is any suspicion of contamination.

Any plant or machines to be used in the project area will be washed down at a designated offsite location prior to mobilising. All machinery, equipment, footwear will be inspected for attached plant material before entering or leaving. If found, it will be removed before entering the area, and disposed of carefully and will not be discarded in or around the site. This is particularly important for works taking place in the dune areas.

Residual effects - invasive species

Following the implementation of mitigation measures outlined the proposed development poses no risk of affecting the conservation objectives, or the conservation condition, of the QI habitats or species of Donegal Bay SPA. There are no residual direct or indirect impacts that could adversely affect the integrity of the SPA.

13.4 Reduction in species density

A reduction in species density in Donegal Bay SPA would be as a consequence of habitat loss, sedimentation, pollution, release of contaminants and the introduction of invasive species, and disturbance, displacement or injury of a species at a critical time in their lifecycle e.g. winter feeding.

Mitigation measures - Reduction in species density

The mitigation measures detailed in section 13.1-13.3 will also mitigate in this instance.

Residual effects - Reduction in species density

With mitigation the project will not pose a risk to the conservation objectives, or the conservation condition, of the QI habitats or species of Donegal BAY SPA. There are no residual direct or indirect impacts that could adversely affect the integrity of the SPA.

Habitat Fragmentation

Habitat fragmentation will not occur at the project site. Winter bird surveys have demonstrated that the location of the facility, car park, path and boardwalk are not used by SCI species for foraging or roosting, neither are they used in any significant numbers by other water birds listed in the SPA documents. The project does not block or cause species to avoid favoured areas; it is within the already busy tourism area at Tullan.

Mitigation measures regarding Habitat fragmentation is not required

13.5 Climate change

The proposed works will not result in any greenhouse gas emissions to air during the operational phase. The construction phase works will have increased temporary emissions which will be localized, however, given the distance to the nearest Natura site these are determined to be negligible. Such effects upon greenhouse gas emissions will not affect changes projected to arise from climate change to the degree that it would affect the QIs or SCIs of the Natura sites considered.

Sand dunes provide natural coastal protection against storm surge and high waves and help prevent or reduce coastal flooding and structural damage to properties behind them. The preservation and strengthening of natural coastal defences, such as sand dune systems, plays an important role in increasing our coastal resilience to the impacts of climate change. The improved management of the dune area will increase resilience at the site.

Option B (see appendix 5); the most sustainable option for the boardwalk and access at Tullan has been chosen, this will reduce the carbon footprint of the project.

13.6 In-combination

The potential for in-combination impacts to arise from the project proposal is regulated and controlled by the environmental policies and objectives of the Donegal County Development Plan.

Any existing/proposed plan or project that could potentially affect Natura 2000 sites in Donegal Bay, in combination with the proposed development, must adhere to the overarching environmental policies of the County Development Plan and Local Area Plans. These policies will ensure the protection of the Natura 2000 sites within the zone of influence of the proposed project and include the requirement for any future plans or

projects to undergo Screening for Appropriate Assessment and/or Appropriate Assessment (NIS) to examine and assess their effects on Natura 2000 sites, alone and in combination with other plans and projects.

There was one other planning application pending in the immediate vicinity of the project area at the time of writing, (the decision date for which was 2022, however it remains live on the ACP website), a Natura Impact Statement accompanies the application. A list of the planning decisions over the past decade can be seen in appendix 3. Previous other projects that have been granted permission include small scale projects: signage, extensions and modifications to existing buildings, change of use, glamping pods, demolition and replacement of a dwelling, and two garage constructions. These projects are small and impacts (if any) are likely to have been short term and negligible given their nature, scale and their location outside the SPA. These projects were granted over a 10 year timeframe therefore they were not implemented all at the same time, thereby reducing any cumulative risks further. Given the nature, size and location of the proposed project in-combination effects are unlikely.

A Natura Impact Report of the County Development Plan which includes the Bundoran Area Plan was carried out and it concluded that it is not foreseen to give rise to any adverse effects on the integrity of Natura Sites, alone or in combination with other plans or projects. The Plan has been formulated to ensure that uses, development and effects arising from developments, based upon the Plan (either individually or in combination with other plans or projects) shall not give rise to significant adverse impacts on the integrity of any Natura 2000 site.

The Strategic Environmental Assessment of the Plan was also carried out. The SEA process ensured that environmental considerations were suitably incorporated into the Plan as adopted. This SEA process will continue with the monitoring of environmental impacts of the implementation of the Plan. This will include ongoing monitoring and the carrying out of a progress report on the implementation of the Plan.

The Wildlife Acts 1976 to 2021

The Wildlife Act is the principal national legislation providing for the protection of wildlife and the control of some activities that may have a negative effect on wildlife. The Wildlife (Amendment) Act 2000 strengthened the 1976 Act by, among other things, giving statutory protection to Natural Heritage Areas, improving existing measures to enhance protection of wildlife species and their habitats (e.g. fish and aquatic invertebrate species, hedgerow cutting) and strengthening the protective regime for Special Areas of Conservation (SACs).

The conservation of biodiversity in Ireland has been strengthened and expanded by EU law including the Water Framework Directive, the Birds Directive and the Habitats Directive

The aims of the Wildlife Act, 1976, are to provide for the protection and conservation of wild fauna and flora, to conserve a representative sample of important ecosystems, to provide for the development and protection of game resources and to regulate their exploitation, and to provide the services necessary to accomplish such aims.

Water Framework Directive

The Water Framework Directive (WFD) obliges member states to manage their waters in an integrated and sustainable way. They must ensure that their waters achieve at least good status, generally by 2027 at the latest, and that current status doesn't deteriorate in any waters. To achieve good status and preserve the best waters, management plans have been prepared for districts around the country. Ireland delivers the EU Water Framework Directive (WFD) through six-year River Basin Management Plans (RBMPs). These plans set out actions to protect and improve water quality, involving government, agencies, and communities.

Evidence based priorities have been adopted for this River Basin Planning Cycle (2022-2027):

- Ensure full compliance with relevant EU legislation.
- Prevent deterioration.
- Meet the water standards and objectives for designated protected areas.
- Protect high-status waters.
- Implement targeted actions and pilot schemes in focus sub-catchments aimed at (i) targeting water bodies close to meeting their objective and (ii) addressing more complex issues that will build knowledge for future cycles.

The Environmental Protection Agency (EPA) Monitoring Programme covers rivers, lakes, coastal waters, and groundwater using long-term checks and targeted surveys where problems are likely. This data tracks progress toward environmental goals and informs River Basin Management Plans. Both chemical and ecological monitoring is undertaken by the EPA to ascertain water quality status.

International Union for Conservation of Nature (IUCN)

IUCN's objectives are to influence, encourage and assist societies throughout the world to conserve the integrity and diversity of nature and to ensure that any use of natural resources is equitable and ecologically sustainable. Its policy work is essential to achieve these objectives and to have an impact on world conservation. The IUCN has been instrumental in development of major environmental conventions and international agreements such as the Ramsar Convention. The Ramsar Convention is an international agreement for the conservation and wise use of wetlands.

IUCN Red Data Lists are a very important resource for conservation and protection of species and their habitats. Red Lists identify which species are in most danger, and categorise threatened species as follows: Extinct in the wild (EW), extinct (EX), critically endangered (CR), endangered (EN), vulnerable (VU), near threatened (NT) or least concern (LC), data deficient (DD), not evaluated (NE). Red lists are an internationally recognized system for highlighting species in danger.

With regard to the project proposed it has been determined that, after mitigation, there will be no residual effects on the Natura 2000 site within the zone of influence of the project. As the proposed development itself will not have any residual negative effects on the conservation objectives of any Natura 2000 sites, considering the lack of other development in the area, the environmental plans and projects outlined above, and considering the mitigation measures described in section 13 and appendix 5, it is not predicted to result in any negative in-combination effects with any other plans or projects.

14.0 Residual Effects

The screening assessment undertaken in terms of the proposed development concludes that, in the absence of mitigation, there is potential for the project to significantly impact Donegal Bay SPA.

To determine if the project, AFTER MITIGATION, will have a significant impact on the integrity of the Natura Sites, the project proposals and mitigation measures have been assessed in terms of the conservation objectives, and targets set for the SPA, see appendix 6.

From the information provided, the assessment of the suitability and effectiveness of proposals suggests that the proposed mitigation measures will be sufficient to protect the receiving environment and Donegal Bay SPA. Potential risks pertaining to the construction and operational phase of the project have been addressed. Residual effects are not anticipated.

15.0 Conclusion

This NIS has been prepared following the Department of the Environment, Heritage and Local Government guidance 'Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities. The function of this report is to assist the competent authority with undertaking an Appropriate Assessment in accordance with the Habitats Directive.

The assessment considers whether the proposed development, alone or in-combination with other projects or plans, will result in adverse effects on the integrity of Donegal Bay SPA, and includes any mitigation measures necessary to avoid or reduce the risk of negative effects.

This NIS has examined and analysed, in light of the best scientific knowledge, with respect to those Natura 2000 sites within the zone of influence of the proposed development, the potential impact sources and pathways, how these could impact on the sites' qualifying interests or special conservation interests and whether the predicted effects would adversely affect the integrity of Donegal Bay SPA. There are no other Natura 2000 sites at risk of effects from the proposed development.

It has been objectively concluded from the examination and analysis of the proposed development, potential effects from same, and the mitigation measures outlined as presented in this report, that the development, alone or in-combination with other projects or plans, proposed by Donegal County Council will not adversely affect (either directly or indirectly) the integrity of Donegal Bay SPA, or any other Natura 2000 site, either alone or in combination with other plans or projects.

16.0 References

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Appendix 1. Site Synopses

SITE NAME: DONEGAL BAY SPA SITE CODE: 004151

Donegal Bay SPA is a very large, marine-dominated, site. It extends from Doorin Point, to the west of Donegal Town, to Tullaghan Point in County Leitrim, a distance of approximately 15 km along its north-east/south-west axis. It varies in width from about 3 km to over 8 km. The site includes the estuary of the River Eske, which flows through Donegal Town, and the estuary of the River Erne, which flows through Ballyshannon. Much of the shoreline is rocky or stony, with well-developed littoral reefs in places. There are also extensive stretches of sandy beaches, especially from the Murvagh peninsula southwards to Rossnowlagh and at the outer part of the estuary of the River Erne. Shingle or cobble beaches are also represented. There are extensive areas of intertidal flats associated with the estuary of the River Eske, reflecting the very sheltered conditions in this part of the bay. These have been shown to be biotope rich, and supporting a range of macro-invertebrates, including polychaete worms (*Hediste diversicolor*, *Arenicola marina* and *Nephtys hombergii*) and bivalves (*Scrobicularia plana*, *Cerastoderma edule* and *Macoma balthica*).

Elsewhere, a narrow fringe of intertidal flats is exposed at low tides. Salt marshes are found in the sheltered conditions of the innermost part of the bay. A number of small, grassy, islands occur in the innermost part of the bay. The waters of the shallow bay overlie mostly sandy substrates, though reefs occur in places.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Great Northern Diver, Light-bellied Brent Goose, Common Scoter and Sanderling. The E.U. Birds Directive pays particular attention to wetlands, and as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

Donegal Bay supports an excellent diversity of wintering waterbirds, especially species associated with shallow bays (all figures are mean peak counts for four of the five winters between 1995/96 and 1999/2000). It has an internationally important wintering population of Great Northern Diver (138) and is consistently one of the top sites in the country for this species. It also has one of the few regular populations of Black-throated Diver in the country (11), and Red-throated Diver (21). It supports an internationally important population of Light-bellied Brent Goose (207) and nationally important populations of Common Scoter (860) and Sanderling (68). A range of other species associated with estuarine and shoreline habitats occurs at the site, including Cormorant (29), Shelduck (24), Wigeon (224), Mallard (100), Long-tailed Duck (14), Red-breasted Merganser (38), Oystercatcher (581), Ringed Plover (99), Golden Plover (103), Lapwing (122), Dunlin (269), Bar-tailed Godwit (49), Curlew (359), Redshank (93), Greenshank (12) and Turnstone (53). Gulls are regular in autumn and winter, especially Black-headed Gull (239) and Common Gull (297). This large coastal site is of high ornithological importance, with two species having populations of international importance (Great Northern Diver and Light-bellied Brent Goose) and a further two species having populations of national importance (Common Scoter and Sanderling). Also of note is that five of the regularly occurring species are listed on Annex I of the E.U. Birds Directive, i.e. Great Northern Diver, Black-throated Diver, Red-throated Diver, Golden Plover and Bar-tailed Godwit.

NPWs version date 13.10.2010

Appendix 2. Tullan Strand Initial Screening

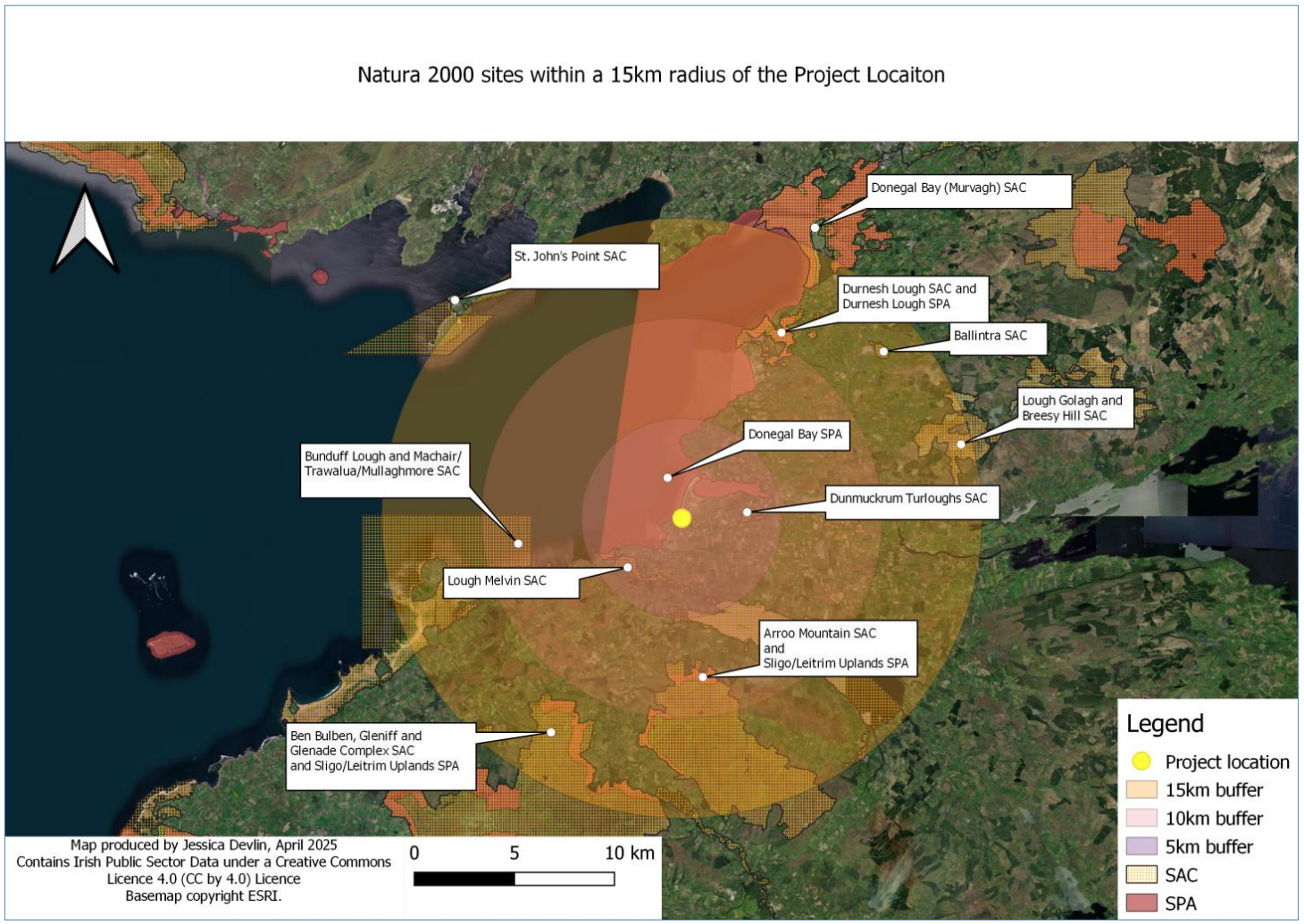


Figure 1. Natura sites within a 15km radius

Site Name (Site Code)	Distance To (m)	Qualifying Interests (* denotes a priority habitat)	Assessment
Lough Melvin SAC (00428)	2819.5	Habitats 3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) Species 1106 Salmon (<i>Salmo salar</i>) 1355 Otter (<i>Lutra lutra</i>)	No source - pathway -receptor relationship. Project is not linked to the structure or functioning of the site.
Dunmuckrum Turloughs SAC ((002303)	3024.68	Habitats 3180 Turloughs*	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site.
Bunduff Lough and Machair/Trawalua/Mullaghmore SAC (00625)	6750.3	Habitats 1140 Mudflats and sandflats not covered by seawater at low tide 1160 Large shallow inlets and bays 1170 Reefs 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* 2190 Humid dune slacks 21A0 Machairs (* in Ireland) 5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	No source - pathway-receptor relationship. Over 6km away; Project is not linked to the structure or functioning of the site. Given the small size and scale of the project, and the dilution factor of the Bay a hydrological link is not considered to exist.

Site Name (Site Code)	Distance To (km)	Qualifying Interests	Assessment
Arroo Mountain SAC (001403)	7015.18	<p>7230 Alkaline fens</p> <p>Species</p> <p>1065 Marsh Fritillary (<i>Euphydryas aurinia</i>)</p> <p>1351 Harbour Porpoise (<i>Phocoena phocoena</i>)</p> <p>1395 Petalwort (<i>Petalophyllum ralfsii</i>)</p> <p>Habitats</p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>4030 European dry heaths</p> <p>4060 Alpine and Boreal heaths</p> <p>7130 Blanket bogs (* if active bog)</p> <p>7220 Petrifying springs with tufa formation (Cratoneurion)*</p> <p>8120 Calcareous and calcshist screes of the montane to alpine levels (<i>Thlaspietea rotundifolii</i>)</p> <p>8210 Calcareous rocky slopes with chasmophytic vegetation</p>	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site.
Durnesh Lough SAC (00138)	8825.98	<p>Habitats</p> <p>1150 Coastal lagoons*</p> <p>6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p>	No source - pathway-receptor relationship. Project is not linked to the structure or functioning of the site. Over 8km away; Given the small size and scale of the project, and the dilution factor of the Bay a hydrological link is not considered to exist.
Ben Bulbin, Gleniff and Glenade Complex SAC (00623)	10469.33	<p>Habitats</p> <p>3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation</p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>4030 European dry heaths</p> <p>4060 Alpine and Boreal heaths</p>	No source - pathway-receptor relationship. Project is not linked to the structure or functioning of the site. Over 10km away.

Site Name (Site Code)	Distance To (km)	Qualifying Interests	Assessment
Lough Golagh and Breesy Hill SAC (002164)	12330.66	<p>Qualifying Interests</p> <p>5130 Juniperus communis formations on heaths or calcareous grasslands</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>6230 Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)*</p> <p>6430 Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels</p> <p>7130 Blanket bogs (* if active bog)</p> <p>7140 Transition mires and quaking bogs</p> <p>7220 Petrifying springs with tufa formation (Cratoneurion)*</p> <p>7230 Alkaline fens</p> <p>8110 Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)</p> <p>8120 Calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii)</p> <p>8210 Calcareous rocky slopes with chasmophytic vegetation</p> <p>Species</p> <p>1013 Geyer's Whorl Snail (<i>Vertigo geyeri</i>)</p> <p>1355 Otter (<i>Lutra lutra</i>)</p>	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site.
Ballintra SAC (00115)	12793.24	<p>Habitats</p> <p>4030 European dry heaths</p> <p>8240 Limestone pavements*</p>	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site.

Site Name (Site Code)	Distance To	Qualifying Interests	Assessment
Donegal Bay (Murvagh) SAC (00133)	13159.94	<p>Habitats</p> <p>1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)*</p> <p>2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)</p> <p>2190 Humid dune slacks</p> <p>Species</p> <p>1365 Harbour Seal (<i>Phoca vitulina</i>)</p>	No source - pathway-receptor relationship. Project is not linked to the structure or functioning of the site. Over 13km away; Given the small size and scale of the project, and the dilution factor of the Bay a hydrological link is not considered to exist.
Glenade Lough SAC (001919)	13385.25	<p>Habitats</p> <p>3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation</p> <p>Species</p> <p>1092 White-clawed Crayfish (<i>Austropotamobius pallipes</i>)</p> <p>1833 Slender Naiad (<i>Najas flexilis</i>)</p>	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site.
St. John's Point SAC (00191)	13726.64	<p>Habitats</p> <p>1160 Large shallow inlets and bays</p> <p>1170 Reefs</p> <p>1230 Vegetated sea cliffs of the Atlantic and Baltic coasts</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)</p> <p>6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p> <p>7230 Alkaline fens</p>	No source - pathway-receptor relationship. Project is not linked to the structure or functioning of the site. Over 13km away; Given the small size and scale of the project, and the dilution factor of the Bay a hydrological link is not considered to exist.

Site Name (Site Code)	Distance To km	Qualifying Interests	Assessment
Lough Gill SAC (001976)	14478.89	<p>8240 Limestone pavements*</p> <p>8330 Submerged or partially submerged sea caves</p> <p>Species</p> <p>1065 Marsh Fritillary (<i>Euphydryas aurinia</i>)</p> <p>1349 Common Bottlenose Dolphin (<i>Tursiops truncatus</i>)</p> <p>Habitats</p> <p>3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p>91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*</p> <p>Species</p> <p>1092 White-clawed Crayfish (<i>Austropotamobius pallipes</i>)</p> <p>1095 Sea Lamprey (<i>Petromyzon marinus</i>)</p> <p>1096 Brook Lamprey (<i>Lampetra planeri</i>)</p> <p>1099 River Lamprey (<i>Lampetra fluviatilis</i>)</p> <p>1106 Salmon (<i>Salmo salar</i>)</p> <p>1355 Otter (<i>Lutra lutra</i>)</p>	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site. No hydrological link.
Donegal Bay SPA (004151)	31.76	<p>Birds</p> <p>A003 Great Northern Diver (<i>Gavia immer</i>)</p> <p>A046 Light-bellied Brent Goose (<i>Branta bernicla</i>)</p>	Source Pathway receptor relationship exists. Potential hydrological, visual and acoustic link with the SCI species in the SPA. SCREENED IN

Site Name (Site Code)	Distance To (km)	Qualifying Interests	Assessment
Sligo/Leitrim Uplands SPA (004187)	7406.4	<p><i>hrota</i>)</p> <p>A065 Common Scoter (<i>Melanitta nigra</i>)</p> <p>A144 Sanderling (<i>Calidris alba</i>)</p> <p>Habitats</p> <p>Wetlands</p>	No source - pathway receptor relationship. Over 7km from the site. Project is not linked to the structure or functioning of the site.
Durnesh Lough SPA (004145)	9497.37	<p>Birds</p> <p>A103 Peregrine (<i>Falco peregrinus</i>)</p> <p>A346 Chough (<i>Pyrhocorax pyrrhocorax</i>)</p>	No source - pathway receptor relationship. Project is not linked to the structure or functioning of the site. Over 9km away; Given the small size and scale of the project, and the dilution factor of the Bay a hydrological link is not considered to exist.

Table 1. Initial Screening Assessment

Appendix 3. Planning history: National Planning and Development Site

PLANNING AUTHORITY	PLANNING APPLICATION REFERENCE	DESCRIPTION OF PROPOSED DEVELOPMENT	DEVELOPMENT ADDRESS	APPLICATION STATUS	TYPE OF APPLICATION	FINAL DECISION ON APPLICATION
DONEGAL COUNTY COUNCIL	1650347	ERECTION OF 3 NO. INFORMATION SIGNS AND ALL ASSOCIATED SITE WORKS	ROUGEY WALK , FINNER , BUNDORAN	APPLICATION FINALISED	PERMISSION	UNCONDITIONAL
DONEGAL COUNTY COUNCIL	1951138	CONSTRUCTION OF GENERAL STORE ROOM WITH CONNECTION TO EXISTING CONFERENCE CENTRE	GREAT NORTHERN HOTEL , FINNER , BUNDORAN	APPLICATION FINALISED	PERMISSION	CONDITIONAL
DONEGAL COUNTY COUNCIL	2350283	REMOVAL OF EXISTING FIRST FLOOR WINDOW AND PROVISION OF A LARGER REPLACEMENT WINDOW ON THE NORTH EASTERN GABLE END OF THE EXISTING CLUBHOUSE BUILDING AND ALL ASSOCIATED SITE	BUNDORAN GOLF CLUB , BUNDORAN , DONEGAL PO	APPLICATION FINALISED	PERMISSION	CONDITIONAL

		WORKS				
DONEGAL COUNTY COUNCIL	1650912	INTERIOR & EXTERIOR ALTERATIONS AND CHANGE OF USE FROM EXISTING OFFICE UNIT TO NEW COFFEE SHOP/CAFÉ AND ALL ASSOCIATED SITE WORKS	FINNER , BUNDORAN , DONEGAL PO	APPLICATION FINALISED	PERMISSION	CONDITIONAL
DONEGAL COUNTY COUNCIL	1951479	EXTENSION OF EXISTING OPEN TIMBER FENCED HORSE EXERCISE YARD FOR HORSE JUMPING & TRAINING AND A TIMBER COVERED HORSE LUNGING PEN LOCATED WITHIN AN EXISTING UNCOVERED CONCRETE WALLED AREA	TULLAN STRAND ROAD , FINNER , BUNDORAN	APPLICATION FINALISED	RETENTION	CONDITIONAL
DONEGAL COUNTY COUNCIL	2050343	CONSTRUCTION OF 4 DETACHED, SINGLE STOREY	TULLAN STRAND ROAD , FINNER , BUNDORAN	APPLICATION FINALISED	PERMISSION	CONDITIONAL

		GLAMPING PODS SET ON CONCRETE BASES, PROVISION OF OFF STREET CAR PARKING SPACES, GRAVEL ACCESS PATHWAYS AND CONNECTION TO THE EXISTING FOUL DRAINAGE NETWORK AT STRACOMER HILL ESTATE ROAD AND ALL ASSOCIATED SITE DEVELOPMENT WORKS				
DONEGAL COUNTY COUNCIL	2350666	REPOSITIONING OF 4 NO. CONCRETE AND PAVING HARDSTANDING AREAS AND REORIENTATION OF 2 NO. DETACHED SINGLE STOREY GLAMPING PODS FROM THE POSITIONS PREVIOUSLY APPROVED IN PLANNING PERMISSION REF.	STRACOMER HILL , TULLAN STRAND ROAD , BUNDORAN DONEGAL PO	APPLICATION FINALISED	RETENTION	CONDITIONAL

		NO. 20/50343 AND ALL ASSOCIATED SITE DEVELOPMENT WORKS				
DONEGAL COUNTY COUNCIL	1650545	(1) DEMOLITION OF AN EXISTING DWELLING HOUSE; (2) RELOCATION OF EXISTING ENTRANCE; (3) CONSTRUCTION OF ONE AND HALF STOREY REPLACEMENT DWELLING HOUSE AND; (4) CONNECTION TO EXISTING PUBLIC SEWER AND ALL ASSOCIATED SITE WORKS	FINNER BUNDORAN , DONEGAL PO	APPLICATION FINALISED	PERMISSION	CONDITIONAL
DONEGAL COUNTY COUNCIL	2350492	CONSTRUCTION OF DOMESTIC GARAGE AND ALL ASSOCIATED SITE WORKS	TULLAN STRAND ROAD , BUNDORAN , DONEGAL PO	APPLICATION FINALISED	PERMISSION	CONDITIONAL
DONEGAL COUNTY COUNCIL	1850295	ERECTION OF A DOMESTIC GARAGE EXTENSION TO SIDE	FINNER TD BUNDORAN , DONEGAL PO	APPLICATION FINALISED	PERMISSION	CONDITIONAL

		OF EXISTING DWELLING AND ALL ASSOCIATED SITE WORKS				
DONEGAL COUNTY COUNCIL	2150564	CONSTRUCTION OF A DWELLING HOUSE AND GARAGE TOGETHER WITH SITE WORKS TO PROVIDE FOR THE DEVELOPMENT OF 7 SITES IN THE FUTURE WITH CONNECTION FOR WASTEWATER TO THE PUBLIC SEWERAGE SYSTEM AND CONNECTION FOR SURFACE WATER TO THE EXISTING FLOODWATER PIPE WITHIN THE CURTILAGE OF BUNDORAN GOLF CLUB COURSE WHICH DISCHARGES TO THE SEA TO THE WEST OF THE GREAT NORTHERN	TULLAN STRAND ROAD , FINNER , BUNDORAN	APPLICATION FINALISED	PERMISSION	CONDITIONAL

		HOTEL. A NATURA IMPACT STATEMENT (NIS) ACCOMPANIES THIS APPLICATION				
AN BORD PLEANALA	313081	CONSTRUCTION OF A HOUSE AND GARAGE TOGETHER WITH SITE WORKS TO PROVIDE FOR THE DEVELOPMENT OF 7 SITES IN THE FUTURE. A NATURA IMPACT STATEMENT (NIS) ACCOMPANIES THIS APPLICATION.	TULLAN STRAND ROAD, FINNER, BUNDORAN, CO. DONEGAL	STATUS LIVE Appeal of DCC application 2150564 as detailed above. Decision due date was 2022 (but remains live on the national planning and development site).		

Table 1. Planning applications in the past 10 years, within 500m of the proposed project development.

Appendix 4. Bird Data

IWEBS DATA - Aughrus Pt – Bundoran, Subsite code:0A468													
Species Code	Species Name	Latin Name IOC	AllIreland _1pc	Flyway_ 1pc	Peak	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2022/ 23
MS	Mute Swan	Cygnus olor	90	100	40	26	11	6	14	9	40	39	14
WS	Whooper Swan	Cygnus cygnus	150	340	11	8	4						11
CG	Canada Goose	Branta canadensis			3					3			
PB	Light-bellied Brent Goose	Branta bernicla hrota	350	400	137	84	49	67	70	92	103	137	35
WN	Wigeon	Mareca penelope	560	14000	72	40	33	42	72	42	45	20	7
GA	Gadwall	Mareca strepera	20	1200	2		2						
T.	Teal	Anas crecca	360	5000	3				1		3		
MA	Mallard	Anas platyrhynchos	280	53000	35	35	11	20	19	13	19	20	19
LN	Long-tailed Duck	Clangula hyemalis			2	2							
E.	Eider	Somateria mollissima	55	9800	320	50	21	9		224	116	8	320
CX	Common Scoter	Melanitta nigra	110	7500	270	243	67	130	14	270	140	5	119
RM	Red-breasted Merganser	Mergus serrator	25	860	4	4	1	2		1	2	2	1
RH	Red-throated Diver	Gavia stellata	20	3000	24		4	6	3	3	10	24	1
BV	Black-throated Diver	Gavia arctica			4	4	4	1	1	3	1		4
ND	Great Northern Diver	Gavia immer	20	50	12	12	1	4	12	7	9	7	2
LG	Little Grebe	Tachybaptus ruficollis	20	4700	1	1							
GG	Great Crested Grebe	Podiceps cristatus	30	6300	1		1					1	
CA	Cormorant	Phalacrocorax carbo	110	1200	13	9	9	5	13	11	6	12	11
SA	Shag	Gulosus aristotelis			17	10	4	6	17	4	1	4	9
H.	Grey Heron	Ardea cinerea	25	5000	8	5	8	4	4	2	4	3	5
MH	Moorhen	Gallinula chloropus			1				1				
OC	Oystercatcher	Haematopus ostralegus	610	8200	154	154	113	117	135	116	124	101	85
RP	Ringed Plover	Charadrius hiaticula	120	540	50	33	38	28	44	26	50	21	34
GP	Golden Plover	Pluvialis apricaria	920	9300	92	92			43				
L.	Lapwing	Vanellus vanellus	850	72300	3	3	1						
KN	Knot	Calidris canutus	160	5300	24							24	
SS	Sanderling	Calidris alba	85	2000	82	13	4			7	82	2	36
PS	Purple Sandpiper	Calidris maritima	20	110	16							16	
DN	Dunlin	Calidris alpina	460	13300	223	29	3	20	150	155	103	159	223
SN	Snipe	Gallinago gallinago			1					1	1		
CU	Curlew	Numenius arquata	350	7600	68	30	26	29	32	53	68	18	50

RK	Redshank	Tringa totanus	240	2400	25	25	6	9	10	7	15	10	21
GK	Greenshank	Tringa nebularia	20	3300	4	1	2		2	4			
TT	Turnstone	Arenaria interpres	95	1400	77	59	51	38	28	31	48	49	77
BH	Black-headed Gull	Chroicocephalus ridibundus			65	16	15	7	28	58	2	65	2
CM	Common Gull	Larus canus			147	78	26	147	69	54	57	91	49
LB	Lesser Black-backed Gull	Larus fuscus			1						1		
HG	Herring Gull	Larus argentatus			341	90	76	145	146	140	184	341	149
GB	Great Black-backed Gull	Larus marinus			21	4	7	4	5	21	6	7	7
AW	American Wigeon	Mareca americana			1	1							
DI	Dipper	Cinclus cinclus			1						1		

Table 1. IWeBs Data for Aughris Point, Bundoran courtesy of Birdwatch Ireland

SCI species in yellow

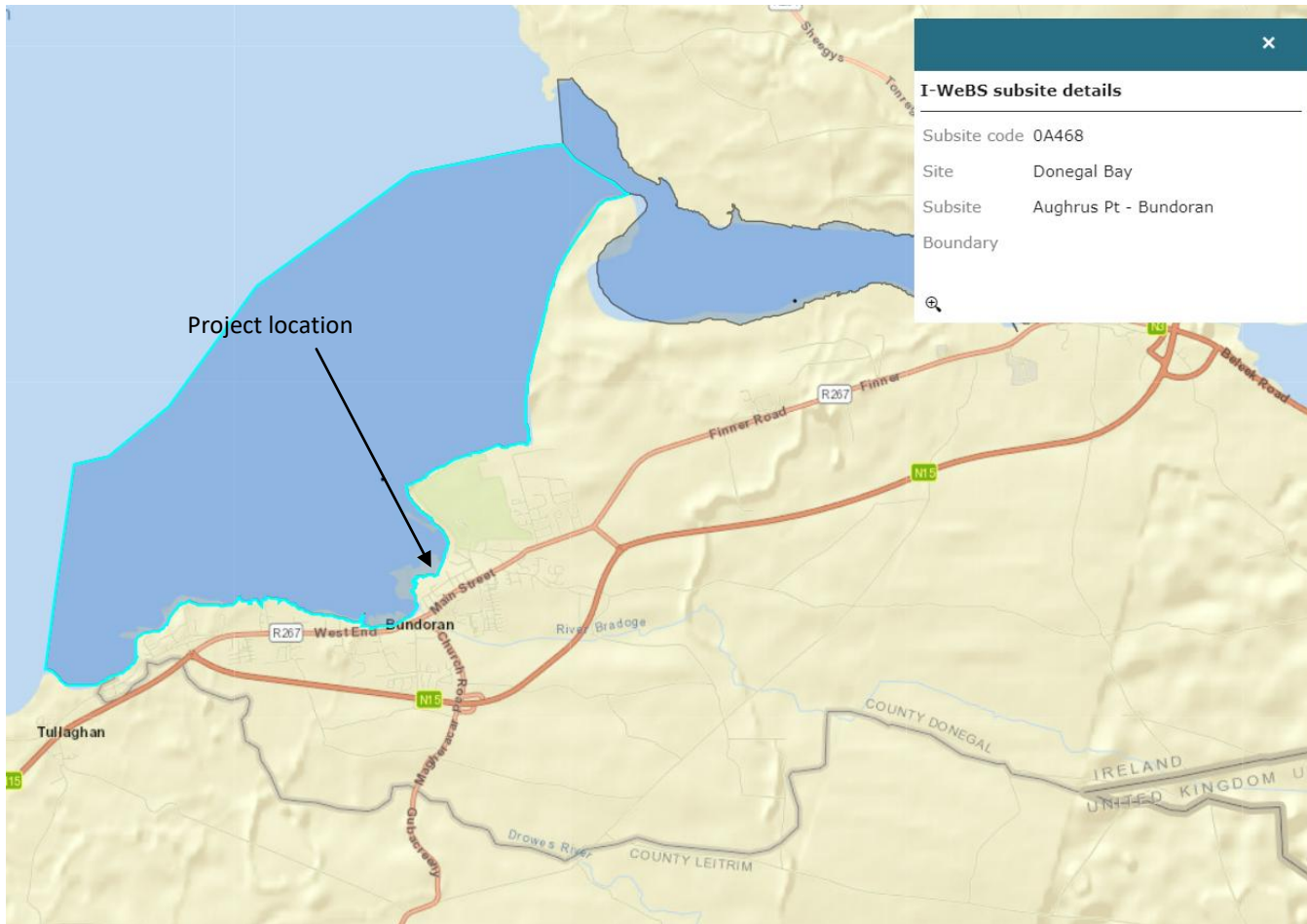


Figure 1. Project location in wider context of I-WeBS subsite Aughris Point (0A468) (Map source birdwatchireland.ie).

2024/25 Bird Watch Survey Dates and Conditions at Tullan Strand

Date	High Tide	Low tide	Survey start	Survey finish	Weather
18/09/2024	18.45		17.40	19.40	0% cloud, F2, 7°C (also sunset)
22/10/2024		15.51	12.49	14.50	0%cloud, F4, 12.5°C
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C drizzle at 17.00
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C
11/12/2024	14.1		12.55	15.10	100%cloud, F0, 4°C
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C
11/03/2025	16.31		15.00	17.00	90% cloud, F4, 10°C
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C
15/04/2025	08.05		07.00	10.00	50 % cloud F4/5 8 – 10°C
13/05/2025	19.20		19.10	21.20	0 % cloud, F4/5, 23.5°C
Table 2. 2024/25 Bird survey dates times and conditions.					

2020/21 CAAS Survey dates Tullan Strand							
	23/11/2020	16/12/2020	31/01/2021	24/02/2021	27/02/2021	16/03/2021	29/03/2021
Table 3. 2020/21 Bird survey dates times and conditions							

Foraging and travelling birds recorded at Tullan Strand in 2024/2025 survey

Date	High Tide	Low tide	Survey start	Survey finish	Weather	Species	Species Code	Number	Habitat	roosting	travelling	foraging
18/09/2024	18.45		17.40	19.40	0% cloud, F2, 7°C	Robin	R	2	cliff			X
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C drizzle at 17.00	Robin	R	1	cliff			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Robin	R.	1	cliff			x
18/09/2024	18.45		17.40	19.40 (also sunset)	0% cloud, F2, 7°C	Sanderling	SS	22	tideline			x
11/12/2024	14.1		12.55	15.10	100%cloud, F0, 4°C	Sanderling	SS	22	beach	x		x
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C	Sanderling	SS	61	tideline			x
18/09/2024	18.45		17.4	19.4	0% cloud, F2, 7°C	Ringed Plover	RP	2	beach			x
18/09/2024	18.45		17.4	19.4 (also sunset)	0% cloud, F2, 7°C	Stonechat	SC	1	cliff			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C drizzle at 17.00	Stonechat	SC	1	cliff			x
11/12/2024	14.1		12.55	15.10	100%cloud, F0, 4°C	Stone Chat	SC	1	beach			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Stonechat	SC	1	cliff		x	x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Stone Chat	SC	1	dunes		x	x
11/03/2025	16.31		15.00	17.00	90% cloud, F4, 10°C	Stonechat	SC	1	dunes			x
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Pied Wagtail	PW	1	cliff			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C drizzle at 17.00	Pied Wagtail	PW	1	carpark			x
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C	Piew wagtail	PW	1	cliff			x
11/12/2024	14.1		12.55	15.10	100%cloud, F0, 4°C	Pied Wagtail	PW	2	beach			x

Date	High Tide	Low tide	Survey start	Survey finish	Weather	Species	Species Code	Number	Habitat	roosting	travelling	foraging
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Pied Wagtail	PW	1	dunes/beach			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Pied Wagtail	PW	1	beach			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Pied Wagtail	PW	1	facility field			x
11/03/2025	16.31		15.00	17.00	90% cloud, F4, 10°C	Pied Wagtail	PW	1	dunes/field			x
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Common Gull	CM	11	beach	x		x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C	Common Gull	CM	12	tideline			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C	Common Gull	CM	3	tideline			x
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C	Common Gull	CM	10	open sea			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Common Gull	CM	15	tideline			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Common Gull	CM	2	tideline			x
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C	Common Gull	CM	7	b/w field			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Common Gull	CM	3	tide line			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Common Gull	CM	3	tideline			x
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C	Twite/linnet	TW/LI	13	dunes		x	x
11/03/2025	16.31		15.00	17.00	90% cloud, F4, 10°C	Twite/Linnet	TW/LI	8	dunes			x
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Oyster Catcher	OY	5	beach			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Oyster Catcher	OY	3	tideline			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Oyster Catcher	OY	30	cliff bottom			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Oyster Catcher	OY	1	tideline			x

Date	High Tide	Low tide	Survey start	Survey finish	Weather	Species	Species Code	Number	Habitat	roosting	travelling	foraging
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C	Oyster Catcher	OY	4	facility field			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Chough	CF	6	b/w field/dunes/beach		x	x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Rook	RO	1	facility field			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Rook	RO	4	b/w field			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Rook	RO	1	facility field			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Rook	RO	1	b/w field feeder			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Rook	RO	4	b/w farm track			x
22/10/2024		15.51	12.49	14.50	0%cloud, F4, 12.5°C	Turnstone	TT	3	cliff bottom			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Turnstone	TT	1	cliff bottom			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C	Herring Gull	HG	4	headland/sea			x
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C	Herring Gull	HG	10	open sea			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Herring Gull	HG	1	tideline			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C	Wren	WR	1	cliff			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C	Great Black-backed gull	GB	8	headland/sea			x
29/10/2024	16.06		15.00	17.00	80% cloud, F1, 14.5°C	Meadow Pipit	MP	1	dunes/beach/cliff			x
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C	Common Scoter	CX	60	open sea	x		x
11/12/2024	14.1		12.55	15.10	100%cloud, F0, 4°C	Common Scoter	CX	50 approx	open sea	x		x
11/12/2024	14.1		12.55	15.10	100%cloud, F0, 4°C	Hooded Crow	HC	2	beach			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Hooded Crow	HC	2	beach			x

Date	High Tide	Low tide	Survey start	Survey finish	Weather	Species	Species Code	Number	Habitat	roosting	travelling	foraging
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Hooded Crow	HC	1	b/w field			x
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C	Gannett	GX	8	breaking waves			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Gannett	GX	9	shore waves			x
05/11/2024		13.39	12.35	2.40	100% cloud, F 3, 12.5 °C	Curlew	CU	19	field opposite facility field			X
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Black-headed Gull	BH	1	tideline			x
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Jackdaw	JD	6	cliff			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Jackdaw	JD	2	b/w field			x
11/03/2025	16.31		15.00	17.00	90% cloud, F4, 10°C	Jackdaw	JD	12	field beside houses			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Jackdaw	JD	9	facility field			x
27/02/2025	17.33		15.33	17.33	10%, F4, 10°C	Magpie	MG	1	b/w field			x
11/03/2025	16.31		15.00	17.00	90% cloud, F4, 10°C	Magpie	MG	2	field beside houses			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Magpie	MG	2	b/w field feeder			x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Sand Martin	SM	2	cliff		x	x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Sand Martin	SM	2	dunes/cliff		x	x
25/03/2025	15.07		13.07	15.07	100%cloud, F2, 12°C	Rock Pipit	RC	1	cliff/beach/dune			x
b/w field = path and boardwalk field												
Facility field= tourism facilities, shower and car park												
SCI Species												
Recorded in the project location												

Table 4. Foraging and travelling birds recorded in 2024 – 2025 survey

Roosting and travelling birds recorded at Tullan Strand in 2024/2025 survey

Date	High Tide	Low tide	Survey start	Survey finish	Weather	Species	Species Code	Number	Habitat	roosting	travelling	foraging
11/12/2024	14.1		12.55	15.1	100%cloud, F0, 4°C	Sanderling	SS	22	beach	x		x
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Common Gull	CM	11	beach	x		x
05/11/2024		13.39	12.35	2.4	100% cloud, F 3, 12.5 °C	Common Gull	CM	5	beach	x		
15/01/2025		12.39	12.39	14.39	0%cloud,F4/5 12°C	Common Gull	CM	8	beach	x		
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C	Common Gull	CM	32	beach	x		
11/03/2025	16.31		15	17	90% cloud, F4, 10°C	Common Gull	CM	3	beach	x		
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Oyster Catcher	OY	3	cliff bottom(from beach)	x		
29/10/2024	16.06		15	17	80% cloud, F1, 14.5°C	Oyster Catcher	OY	28	beach	x	x	
11/12/2024	14.1		12.55	15.1	100%cloud, F0, 4°C	Oyster Catcher	OY	25	field opposite facility - RHS of entrance rd.	x	x	
07/02/2025	13.18		11.18	13.18	0%, F4, 6°C	Oyster Catcher	OY	2	beach	x		
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Common Gull	CM	2	cliff bottom	x		
11/12/2024	14.1		12.55	15.1	100%cloud, F0, 4°C	Buzzard	BZ	1	cliff	x	x	
22/10/2024		15.51	12.49	14.5	0%cloud, F4, 12.5°C	Herring gull	HG	1	cliff bottom	x		
05/11/2024		13.39	12.35	2.4	100% cloud, F 3, 12.5 °C	Common Scoter	CX	60	open sea	x		x
11/12/2024	14.1		12.55	15.1	100%cloud, F0, 4°C	Common Scoter	CX	50 approx	open sea	x		x
11/12/2024	14.1		12.55	15.1	100%cloud, F0, 4°C	Curlew	CU	8	field opposite facility - RHS of entrance rd.	x		

b/w field = path and boardwalk field

Facility field= tourism facilities, shower and car park

SCI Species

Table 5. Roosting and travelling birds recorded in 2024-2025 bird surveys

CAAS Summary Data for foraging birds at Tullan Strand in 2020/2021 surveys

Site	BTO Code + Number Recorded	Habitat Description	Tidal Conditions	2024-2025 Corresponding location
Tullan_strand_Forage1_January	CM6, LB2, OC20, SS17	sandy beach	Mid Tide	Whole beach
Tullan_strand_Forage2_January	OC11	short grass along cliff top		Cliff top- Not clear from data if this included the facility field
Tullan_strand_Forage3_January	RA95, GU132, GB4, CA5, CX12	open sea	Mid Tide	Open sea
Tullan_strand_Forage4_January	CU17	short grass, private field		Field opposite facility field/RHS of entrance
Tullan_strand_Forage5_January	BH5, HG2, OC3	intertidal zone	Low	Breaking waves
TullanStrand_Foraging 1_February 1	CM1, HG2	sandy shore	Low	Beach in front of Finner dunes
TullanStrand_Foraging 2_February 1	HG2	open marine water	Low	Open water
TullanStrand_Foraging 3_February 1	CM3	GA1	Low	Field opposite facility field/RHS of entrance
TullanStrand_Foraging_February 2	OY1, SS9, HG3, RP2, CM3	sandy shore	Low	Beach in front of Finner dunes
TullanStrand_Foraging 1_March 1	OY2, CF2	GA2	Mid Tide	Amenity grassland
TullanStrand_Foraging 2_March 1	OY1, RP2, SA1	sandy shore	Mid Tide	Whole beach
TullanStrand_Foraging 3_March 1	OY1, HG2	rocky shore	Mid Tide	Cliff bottom
TullanStrand_Foraging 1_March 2	RP3, CM2, OY1, SS74	sandy shore	Low	Whole beach
TullanStrand_Foraging 2_March 2	OY1	GA2	Low	Amenity grassland
Tullan Strand_Foraging 1_November	S 4 , HG2	sandy shore	Mid Tide	Beach in front

				of Finner dunes
Tullan Strand_foraging 2_November	SS 15	sandy shore	Mid Tide	Beach beside existing entrance
Tullan Strand_foraging 3	HG2	sandy shore	Mid Tide	Beach in front of Finner dunes
Tullan Strand_foraging 4_November	CU 38, OY16, CM5 HG3	GA1		Field opposite facility field/RHS of entrance v. small area of facility field
Tullan Strand_Foraging 1December	GB1, HG2	sandy beach	Low	Beach out to sea
Tullan Strand_Foraging 2_December	CU34	GA1		Field opposite facility field/RHS of entrance
Corresponding locations were determined as much as possible using GIS data, as supplied by Donegal County Council				

Table 6. CAAS summary data for 2020-2021 surveys

CAAS Summary Data for Roosting birds at Tullan Strand in 2020/2021 surveys

Site	Habitat Description	BTO Code + Number Recorded	2024-2025 Corresponding location
TullanStrand_Roost 1_March	rocky shore base of cliffs	OY1, HG2	Cliff bottom
TullanStrand_Roost 2_March	sandy shore	CM4	Whole beach
Tullan Strand_Roost 1_November	sandy shore	SS 52	Beach RHS of site
Tullan Strand_roost 2_November	sandy shore	OY10, HG2, CM1	Beach in front of site
Tullan Strand_roost 3_November	rocky cliff	CF 6	Cliffs at existing entrance
Tullan Strand_Roost 1_December	sandy beach	GB1, HG1, CM1	All along beach
Tullan Strand_Roost 2_December	sandy beach	CM30, HG10	Beach out towards headland
Corresponding locations were determined using GIS data, as supplied by Donegal County Council.			

Table7. CAAS Summary data 2020-2021 surveys

Appendix 5. Mitigation Measures

The project has been designed in cognisance of the SPA adjacent to the site. A number of in-design/avoidance mitigation has also been incorporated into the project.

A Construction and Environmental Management Plan has been submitted with the planning application.

A full suite of site specific mitigation measures are detailed in Table 1 and 2.

NOTE MITIGATION FOR ALL ECOLOGICAL AND NATURA 2000 aspects have been included in the table to ensure continuity across the project.

In-design mitigation / avoidance

In selecting potential locations and sites, Fáilte Ireland conducted a detailed assessment of environmental considerations in order to take account of any potential environmental or ecological issues, concerns, constraints and/or opportunities at each prospective location.

A traffic light system categorised the locations according to the following criteria:

Green Mild No obvious ecological constraints

Amber Ecologically sensitive site with potential to be managed appropriately*.

Deep Amber Ecologically sensitive site which may provide supporting habitat for protected species.

Red Clear ecological constraints are evident

The constraints matrix focused on ecological sensitivities but also considered planning issues such as archaeology, scenery, traffic and/or water services.

The existence of hard surfaced areas and infrastructure on site promoted a favourable outcome; this was derived from the Wild Atlantic Way (WAW) monitoring programme data which identified that serviced and/or managed sites have less impacts associated with them . Tullan Strand was characterised as an Amber site and was chosen to proceed.

At Tullan there were three possible options for the route, the least impactful, Option B, has been chosen, see extracts from Jennings O'Donovan Engineering report

"...Option A – Improvements to Existing Unauthorised Access

Requires significant earthworks, imported granular fill, sheet piling and installation of rock armour on the beach to withstand wave action.

Whilst much of the materials could be sourced close to the site, the large rock armour would be difficult to transport and place correctly, and the sheet piles would need to be imported from abroad. Both of these elements would incur a large carbon footprint. Option A could also impact on available habitat due to the additional length of the route along the cliff face.

Option B – New At-Grade Access Route

To provide an at-grade access to Tullan Strand the best route would run behind the dunes to the east of the strand, following the existing private road from the car park to the agricultural entrance, crossing the field, crossing over the stream on a pedestrian bridge and crossing the dunes on a boardwalk ramping down to the strand at the western end.

Option B minimises the quantity of imported material for the majority of its length. It is also located behind the dunes where the majority of the route is protected from the sea. The principal elements which would need to be imported are the bridge over the stream and the boardwalk through the dunes.

Option B is preferred from an environmental perspective as it limits the works needed immediately adjacent to the SPA, and as the closed existing access route would provide additional habitat. Furthermore, it incorporates measures which protect the sand dunes behind the strand.

Option C – New Elevated Access Route

Option C would require significant engineering work to construct. The majority of the route is directly exposed to the sea in a location where storm damage is likely Option C is problematic from an environmental perspective as it could impact on the cliff habitat causing removal of bird nesting sites without generating mitigating effects....”

Option B is the preferred option.

It is the least intrusive, will protect the dune system and will not involve loud and damaging engineering methods such as rock breaking, importation of large quantities of fill and sheet piling.

The location of the facility, car park, paths and boardwalk are all located outside the SPA above the cliffs, out of view of the SPA, and tucked behind the dune system thereby obscuring it from view.

A construction and environmental management plan has been developed which includes a suite of mitigation measures including: erosion and sediment controls management of hazardous materials.

Screening will be erected around the boundary of the construction site as is normal practice.

Operation

A SuDs design is proposed.

In the car park precipitation falling on hard ground will be treated by hydrocarbon/grit interceptors before discharge to ground. Back up pumps, additional storage volume, as well as in-situ and remote alarms for wastewater treatment facilities are proposed, which will connect to the mains system.

The car park will have mounds of planted soil to soften the appearance and this will also serve to screen the facility from any foraging birds in the surrounding fields during operation activity.

Preconstruction survey	Location	Survey objective	Survey timing/seasonality	Licence required for survey?	Specification for surveyors
Nesting Birds Only necessary if works cannot be avoided March - Aug inclusive	Dunes, cliff, agricultural land and any stone walls marked for removal	Determine if nests present. Set up exclusion zones. Apply for licence for removal of nests if required.	March - August inclusive (where no nests present works must proceed within 72 hours otherwise re-survey required).	Yes, if nests are to be removed.	Ferguson Lees <i>et al.</i> , 2011
Other fauna	Any burrows or nests are present within the project footprint	Monitor and check for activity prior to works in order to avoid injuring or killing animals or young.	All year	No	Qualified ecologist

Table 1. Preconstruction surveys

Source	Pathway	Receptor	Mitigation Measure
Site management	Construction site	Donegal Bay SPA Waterbirds Wetland/Marine habitat	<p>NPWS will be contacted prior to commencement. Site access and management. Works will be overseen by a qualified engineer/ architect and an ecological clerk of works will be appointed. All mitigation measures will be incorporated into method statements of the appointed contractor. Training will be provided to all staff Site will be strictly monitored.</p> <p>All works must adhere to best practice including those for Pollution Prevention (PPGs), and will conform to the Guidelines on protection of fisheries during construction works in and adjacent to waters, Inland Fisheries Ireland (2016), with particular reference to chapter 7, and A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning.</p>
Biosecurity			
Importation of Invasive species	Importing materials	Donegal Bay SPA Waterbirds Wetland/Marine habitat Foraging grounds Dune Habitats	<p>In order to comply with Regulations 49 and 50 of the European Communities (Birds and Natural Habitat) Regulations (2011), the appointed Contractor will ensure biosecurity measures are implemented throughout the construction phase to ensure the introduction and translocation of invasive species is prevented. When importing materials from outside a site there is always a risk of importing unwanted elements such as seed or spores from invasive plants for example, Japanese knotweed or Rhododendron. Measures will be taken to ensure imported material is clear of contaminants and comes from a known reliable source, by using certified suppliers, requesting information on origin, carrying out visual Inspection, obtaining source certification, and independent laboratory testing if there is</p>

			any suspicion of contamination. Any plant or machines to be used in the project area will be washed down at a designated offsite location prior to mobilising. All machinery, equipment, footwear will be inspected for attached plant material before entering or leaving. If found, it will be removed before entering the area, and disposed of carefully and will not be discarded in or around the site
Construction	Habitat degradation or loss	Donegal Bay SPA Waterbirds Wetland/Marine habitat Foraging grounds Dune Habitats	<p>NPWS will be contacted prior to any works taking place within the SPA/ pNHA.</p> <p>Construction workers will be made aware of the sensitivities in the area and the dune area will be fenced off as much as is practical during works.</p> <p>Works in the dunes will be done by hand as much as is practicable. Tracked machinery will not be used in the dune system.</p> <p>Split hazel fencing will be erected around the edge of the dunes, to encourage recovery and to guide pedestrians into the access path. The access path and split hazel fencing will control visitor and activity provider movements in and around the site and will deter users from tramping through the dune system by providing them with a direct, safe and accessible route.</p> <p>Any damaged areas will be reinstated and planted with Dune grasses as appropriate.</p> <p>A clear sign showing the exit from the beach will be erected.</p> <p>Information and education panels will be erected around the project area explaining dune systems, the biodiversity associated with them and their coastal protection benefits</p>

Construction	Visual	Donegal Bay SPA -Waterbirds	Temporary visual screening structure will be erected during the period of construction. This structure will be approximately 2.4 meters in height and will screen views of the majority of activity with the construction site. The screening will run all along the boundary of the Project site. It will be built out of timber and will be designed to last for the duration of the construction period. On completion of the Project it will be dismantled.
Construction/Operation	Visual	Donegal Bay SPA - Waterbirds	Earth mounds to be planted around the perimeter of the facility car park to screen it from view and to provide a soft buffer between the facility and any foraging birds.
Silt fencing	Runoff	Donegal Bay SPA Waterbirds Wetland/Marine habitat	Silt fences will be constructed using a permeable filter fabric Hy-Tex Terrastop Premium silt fence or similar, and installed as per manufacturers guidelines. Silt fencing to be strictly monitored for tears or breaches especially after periods of wet weather. Sandbags: Sand to use washed non-calcareous sand (washing to occur off site).
Settlement lagoon	Runoff from installation	Donegal Bay SPA Waterbirds Wetland/Marine habitat	Works will be carried out in dry weather. Silt fencing will be established around the site for the lagoons. The lagoons will be dug out and lined with an impermeable layer, the excavated earth will be used to create a bund around the silt lagoon.
Compound	Run off and spills	Donegal Bay SPA Waterbirds Wetland/Marine habitat	The proposed compound location is a dedicated area of hard standing .The compound will be developed for the safe storage of materials, including a bunded refuelling station, drip trays, impermeable sheeting and spill kits. Silt fencing will be established around the compound area.
Haulage routes, vehicles and construction traffic	Run off from construction site	Donegal Bay SPA Waterbirds Wetland/Marine habitat	Designated routes and parking areas are proposed. Speed limit of 15km p/hr. Vehicles carrying loose soil, aggregate and workings will be

			<p>sheeted at all times.</p> <p>Appropriately designed vehicles for materials handling will be used.</p> <p>All construction plant and equipment will be maintained in good working order and not left running when not in use.</p> <p>Regular inspection and cleaning of local roads and site boundaries to check for dust deposits, and removal as required.</p> <p>All machines shall be suitably maintained to ensure that emissions of engine-generated pollutants shall be kept to a minimum in accordance with 'Measures Against the Emission of Gaseous and Particulate Pollutants from Internal Combustion Engines to be Installed in Non-Road Mobile Machinery' (2002/88/EC) and 'Emissions of Pollutants from Diesel Engines' (2005/21/EC).</p> <p>A self contained wheel wash will be used and contaminated water collected.</p>
<p>Clearing of vegetation</p> <p>Construction near nesting sites</p>	<p>Damage to habitat, habitat loss, injury, mortality</p>	<p>Nesting habitat –Birds</p>	<p>There will be no hedgerow cutting required, however works along the road in the scrub area, and behind / in the dunes may disturb nesting birds.</p> <p>If it is not possible to adhere to the Wildlife act restrictions a preconstruction survey will be undertaken by a suitably qualified ecologist prior to removal of vegetation (this will include earthworks as some birds may nest in grass or scrub within the site. The site above known sand martin sites must not be disturbed during nesting season.)</p> <p>Where surveys determine no nests are present, works must proceed within 72 hours or further surveys will be required.</p> <p>If a nest is found, it will be clearly marked and a buffer zone established around it, and left until fledglings have left.</p> <p>Alternatively if the nest has to be removed a derogation licence will be required from NPWS.</p>

<p>Site preparation topsoil removal materials handling and levelling</p>	<p>Run off from construction site</p>	<p>Donegal Bay SPA Waterbirds Wetland/Marine habitat</p>	<p>Prior to construction: Biosecurity to be implemented. Erosion control is the first line of defence followed by sedimentation controls. The site substrate will be stabilised around the boundary to prevent any surface run off. This will be done by retaining existing vegetation as 5m buffer around the site. Silt fencing will then be installed. During excavation material will be loaded directly into a tipping lorry for removal for use or storage as appropriate. There will not be any soil removal from the site, all soil will be reused and stockpiled if required in the construction compound. Disturbed soils will be stabilised as soon as practicable, either temporarily or permanently as required, e.g. sowing, impermeable mats. Excavation works will not be carried out during or following heavy rainfall. Dewatering of excavations shall be avoided where possible. If required, this will be achieved by pumping excess water to settlement lagoon/tank at the construction site, where the water will be retained for a sufficient length of time to allow particles to settle, before discharge to the drainage system for treatment.</p>
<p>Materials storage, stockpiling.</p>	<p>Run off from construction site</p>	<p>Donegal Bay SPA Waterbirds Wetland/Marine habitat</p>	<p>Stockpiles of materials will be located in a designated area in the compound. Surface areas of stockpiles will be kept to a minimum to reduce area of surfaces exposed to wind pickup. Where appropriate, windbreak netting/screening will be positioned around material stockpiles and vehicle loading/unloading areas. Stockpiles will be covered during periods of heavy rainfall e.g. impermeable mats (plastic sheeting).</p>

			<p>During dry or windy weather, material stockpiles and exposed surfaces will be covered.</p> <p>Silt fencing will be established at the toe of stockpiles and around the compound area.</p>
Completions and landscaping	Run off from construction site	Donegal Bay SPA Waterbirds Wetland/Marine habitat	<p>Disturbed soils will be stabilised as soon as practicable by sowing.</p> <p>Silt fencing will remain until soils are stabilised.</p>
Excavation to install drains	Run off from construction site.	Donegal Bay SPA Waterbirds Wetland/Marine habitat	<p>Large excavation works to be done in dry weather.</p> <p>Excavated material to be loaded onto lorries/dumper truck for immediate reuse or stockpiling in designated area.</p> <p>Drains to be protected with geotextile bund, fixed with sandbags to prevent surface water runoff into the openings.</p> <p>During utility and drainage works, silt traps will be created using sandbags when connecting to the facility infrastructure to ensure no sediment is released down the pipes. Any sediment will be removed manually and relocated on site.</p>
Contaminated water	Run off from construction site. Pollution.	Donegal Bay SPA Waterbirds Wetland/Marine habitat	<p>Existing drains will be closed to facilitate construction. Storm water drains will be created and directed to settlement lagoon and released as required in a controlled manner.</p> <p>Settlement lagoons/tanks will be used to treat water; this will be appropriately sized and designed to cope with a 1 in 10 year storm event of 14hour duration. If dewatering is required the water will be pumped to the settlement tank/lagoon to allow sediment to settle before water is reused or discharged.</p> <p>The vehicle wash proposed will be connected to the settlement lagoon/tank where water will be treated prior to release.</p> <p>All drain inlets that could receive storm water and runoff (outside the site perimeter) from the site will be protected using drain covers, and maintained.</p> <p>During construction the site will be serviced by portaloos. These</p>

			<p>will be serviced regularly by a licensed contractor.</p> <p>Staff will monitor the system, to ensure water discharges meet the baseline levels. Ongoing monitoring may indicate the need for additional sediment controls. Location, quantity and method of installation will be agreed in consultation with the site manager and statutory agencies as required.</p>
<p>Contamination from hazardous materials - oils, fuels, chemicals</p>	<p>Run off from construction site, spills and leaks. Pollution.</p>	<p>Donegal Bay SPA Waterbirds Wetland/Marine habitat</p>	<p>Refuelling of plant/machinery will be undertaken in designated areas on an impermeable surface within the compound area</p> <p>Refuelling will always be carried out in a controlled manner with absorbent materials available to clean up any spillages.</p> <p>All machinery/equipment will be well serviced and in good working condition. Machinery/equipment will be inspected daily for leaks of hydrocarbons. Any faulty machinery/equipment will be repaired/replaced immediately.</p> <p>A bunded storage area will be located in a designated area within the compound and will be provided for the duration of the construction period for the storage of oils, fuels, chemical and other hazardous materials.</p> <p>If any oil or fuel is stored in the area, it will be kept in a bunded area (providing 110% capacity of the largest stored unit). Chemicals will have individual separate bunds and storage areas.</p> <p>Associated waste materials will be transported by registered carriers, and disposed of to appropriately licensed sites.</p> <p>Drip trays will be supplied for static machinery.</p> <p>Spill kits will contain 10 terrestrial oil booms (80mm diameter x 1000mm) and a plastic sheet, upon which contaminated soil can be placed to prevent contamination of groundwater.</p> <p>Procedures will be set in place to respond to any emergency incidents which may occur on the Site. All appropriate staff will be trained and made aware of the pollution and spill contingency procedures set in place. In the event of an incident the NPWS,</p>

			and the Environment Protection Agency will be notified immediately.
Concrete	Run off from construction site. Pollution.	Donegal Bay SPA Waterbirds Wetland/Marine habitat	Pouring concrete will not be carried out during periods of heavy rainfall. Premix concrete lorries will deliver all concrete to site, which will be pumped directly into the required area. Vehicles will leave immediately after delivery. Strictly no washing of concrete premix lorries will be permitted on site.
Dirty vehicles and equipment	Run off from construction site. Pollution.	Donegal Bay SPA Waterbirds Wetland/Marine habitat	A designated area will be allocated for the washing of vehicles and other equipment; the dirty water from same will be contained and redirected to the settlement lagoon/tank.
Waste management	Construction site	Donegal Bay SPA Waterbirds Wetland/Marine habitat Coastal habitats	Waste will be removed from the site and disposed of by an approved waste contractor in accordance with prevailing waste management regulations. On completion of the works, all apparatus, plant, tools, offices, sheds, surplus materials, rubbish and temporary erections or works of any kind will be removed from the site
Completions and landscaping	Run off from construction site	Donegal Bay SPA Waterbirds Wetland/Marine habitat Coastal habitats	Disturbed soils will be stabilised as soon as practicable by sowing. Silt fencing will remain until soils are stabilised.
Construction site/excavations	Damage to foraging habitat, habitat loss, disturbance, displacement injury, mortality	Terrestrial Habitat –,- mammlas	All construction pits and trenches will be covered outside of construction hours to avoid animals becoming trapped within and injured and/or killed. Machinery and equipment will be made safe, or cordoned off with temporary fencing at the end of the working day. Screening as proposed for Waterbirds, will offer protection for all mobile fauna in the area.

Construction of boardwalk	Damage to dune habitats	Annex I habitats	No tracked machinery should be used in the dune system. If this is unavoidable matting will be placed along the route for the machines to protect them as much as possible. Any damaged areas will be reinstated and planted as appropriate in consultation with NPWS.
Construction of path and boardwalk	Noise and disturbance loss of breeding habitat	Breeding birds	Works on the path, access road and boardwalk will take place during the winter months to avoid disturbing nesting birds. This is of particular relevance to the path above the cliff area, which is above a sand martin nesting site, and the dune area which is Meadow pipit territory. If works in the summer season is unavoidable a breeding bird survey will be undertaken to determine if active nests are present. (See pre construction survey table).
Emergency Event	Run off from construction site, Spills, damage to equipment	Donegal Bay SPA Waterbirds Wetland/Marine habitat	All operatives pre, during and post construction will be made fully aware of the environmental sensitivities in the area and the procedures to follow in the event of an emergency or pollution incident. If an emergency event should arise (e.g. an extreme weather event), with the capability of generating additional erosion and sediment laden runoff the necessary equipment required in responding to this event will be stored on site. Staff will be trained in the use and application of these temporary emergency measures which may involve: Impermeable matting, silt fences, mulching and portable settlement tanks. In the event of an incident the NPWS and the Environment Protection Agency will be notified immediately.
Operation			
Surface water runoff/wastewater	Run off from site Malfunction of waste	Donegal Bay SPA Waterbirds Wetland/Marine habitat	Hydrocarbon/ silt interceptors will be maintained and a service agreement will be in place to provide this service. Surface water requiring treatment will pass through hydrocarbon

	water treatment facilities		<p>/grit interceptors prior to discharge to ground. These are fitted with alarms in case of malfunction.</p> <p>Grey water and waste water will be pumped to the existing treatment facility. The pumping facility will have a back up and alarm system to alert operators of any malfunction.</p>
Lighting	Habitat loss and fragmentation due to artificial lighting	Donegal Bay SPA Waterbirds, Other Birds and Bats	<p>There will be no additional lighting along the path and boardwalk.</p> <p>Direct lighting on trees, hedges shrubs, wildlife corridors such as stone walls must be avoided. All lights should lack UV elements. Low-pressure sodium lights will be used in preference to high pressure sodium lights or mercury lamps. If mercury lamps are to be used, ultraviolet (UV) filters will be fitted.</p> <p>Directional lighting – that is, lighting only at the intensity and direction it is needed will be used throughout, to direct light spill away from habitat.</p> <p>Height of lighting columns in new car park – Height of light masts will be minimised; masts will be preferably below 3 m high.</p> <p>Duration of lighting – Lights will only be on when in use or for health and safety purposes. The use of timers and sensors are ways of controlling this. Motion sensitive lighting where appropriate will be used.</p>
Visitor management	Damage to Habitat	Dune system and SPA	<p>The dune area around the new path and boardwalk will be fenced with split hazel fencing to deter movement from the path through the dunes. The fencing will extend along the path to the boardwalk and extend along the dunes at the beach to encourage visitors to use one route only. The exit from the beach will be clearly marked.</p> <p>Damaged areas of dune will be planted with appropriate species</p>

			<p>(where in the remit of DCC and in consultation with NPWS).</p> <p>Consultation with activity providers at Tullan strand will aim to reduce potential impacts on the dune system and the wider Tullan area. Providers to be engaged and informed of the ecological constraints at the site and a code of conduct agreement reached.</p> <p>Water activities to remain at established locations, and should not be permitted to spread ad hoc along the length of the beach, this will protect foraging and roosting areas.</p> <p>Information and Education panels will be installed at several locations to encourage the dissemination of information about the ecological value and sensitivities of the dune system, Waterbirds and other ecological features at Tullan strand.</p>
Operation	Damage to Habitat	Dune system	<p>Maintenance</p> <p>Ongoing maintenance of the boardwalk and fencing must be done following the same methods as construction.</p> <p>The maintenance of suitable sand binding vegetation to support the natural dune building and repair processes to prevent erosion damage is an ongoing effort. This also involves the control of problem plants for example Sea-buckthorn, to eliminate any potential invasive species before they become widespread</p>

Table 2. Mitigation measures

Appendix 6. Residual Effects

Assessment of Mitigation Measures in terms of Conservation Objectives, Attributes and Targets

The following Natura 2000 sites were screened in for further assessment during the screening for appropriate assessment and formed the terms of reference for the Natura Impact Statement.

Donegal Bay SPA

The project has been assessed in terms of the potential for residual effect which may affect reaching specified targets in the Conservation Objectives for the **Special Conservation Interests**, see **table 1**.

Donegal Bay SPA			
<p>Objective 1: To maintain the favourable conservation condition of the waterbird Special Conservation Interest species listed for SPA.</p>	<p>Target 1: The long term population trend for each waterbird Special Conservation Interest species should be stable or increasing. There should be no significant decrease in the range, timing or intensity of use of areas by the waterbird species of Special Conservation Interest, other than that occurring from natural patterns of variation.</p> <p>T1: Waterbird populations are deemed to be unfavourable when they have declined by 25% or more, as assessed by the most recent population trend analysis.</p> <p>For the species of Special Conservation Interest, the scope of Objective 1 covers the need to maintain, or improve where appropriate, the different properties of the wetland habitats contained within the SPA.</p>	<p>Mitigation measures proposed to protect the receiving marine environment during construction and operation.</p>	<p>No residual effect on T1:</p>
<p>Objective 2: To maintain the favourable conservation condition of the wetland habitat</p>	<p>Target 1: The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 10,461 ha, other than that occurring from natural patterns of variation.</p>		<p>No residual effect on T1: The boundary/extent of the SPA will not be affected by the proposal</p>

<p>at Donegal Bay SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.</p>	<p>T1: The boundary of this SPA includes the core wetland area known as Donegal Bay. Objective 2 seeks to maintain the permanent extent of this wetland habitat, which constitute an important resource for regularly-occurring migratory waterbirds.</p> <p>The maintenance of the 'quality' of wetland habitat lies outside the scope of Objective 2.</p>		
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Table 1. Assessment of residual effects

From the information provided by the project promoter, the assessment of the suitability and effectiveness of proposals suggests that:

The proposed surface/ storm water and groundwater quality measures would be sufficient to protect the receiving environment in Donegal Bay. Potential risks pertaining to the construction and operational phases of the project have therefore been addressed.

Sufficient mitigation is proposed to protect Waterbirds from the effects of disturbance and displacement caused by the project.

Sufficient mitigation is proposed to ensure spread of invasive species does not occur.

Sufficient mitigation is proposed to ensure that a reduction in species density does not occur.

The potential for the project to significantly impact on Donegal Bay SPA (004151) has therefore been removed.