APPENDIX 6

APPROPRIATE ASSESSMENT SCREENING REPORT & NATURA IMPACT STATEMENT ADDENDUM

MKO Planning and Environmental Consultants

Appropriate Assessment Screening Report and Natura Impact Statement Addendum

Croagh Wind Farm, Co. Leitrim and Sligo

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Planning and Environmental Consultants

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1. INTRODUCTION

This Appropriate Assessment Screening Report (AASR) and Natura Impact Statement (NIS) addendum has been prepared by MKO, on behalf of FuturEnergy Croagh Designated Activity Company as part of the remittal process for the proposed Croagh Wind Farm Development, located on the boundary of the Counties of Leitrim and Sligo. The planning application for the Proposed Development was originally submitted to Sligo County Council (Pl. Ref: 20/251) and Leitrim County Council in 2020 (Pl. Ref: 20/120) and was accompanied by an NIS.

This addendum report has been prepared to provide the results of updated ecological surveys of the Proposed Development site undertaken in 2025. These surveys were undertaken to account for the time that has passed since the surveys undertaken to inform the planning applications for the Proposed Development lodged in 2020. They serve to verify the results of the initial surveys and to describe any changes to the ecological baseline since the completion of those surveys which were undertaken between 2017 and 2020.

Since the preparation of the AASR and NIS which accompanied the planning applications for the Proposed Development in 2020, updated Site Specific Conservation Objectives (SSCOs) have been published by the National Parks and Wildlife Service (NPWS) for a number of European Sites which were considered in the AASR and NIS. This addendum considers both the AASR and NIS. A review of all relevant updated SSCOs is undertaken and an assessment of the potential for significant effects on European sites in light of the updated SSCOs is undertaken for the AASR. An assessment of the potential for adverse effects on relevant European sites in light of the updated SSCOs is undertaken for the NIS.

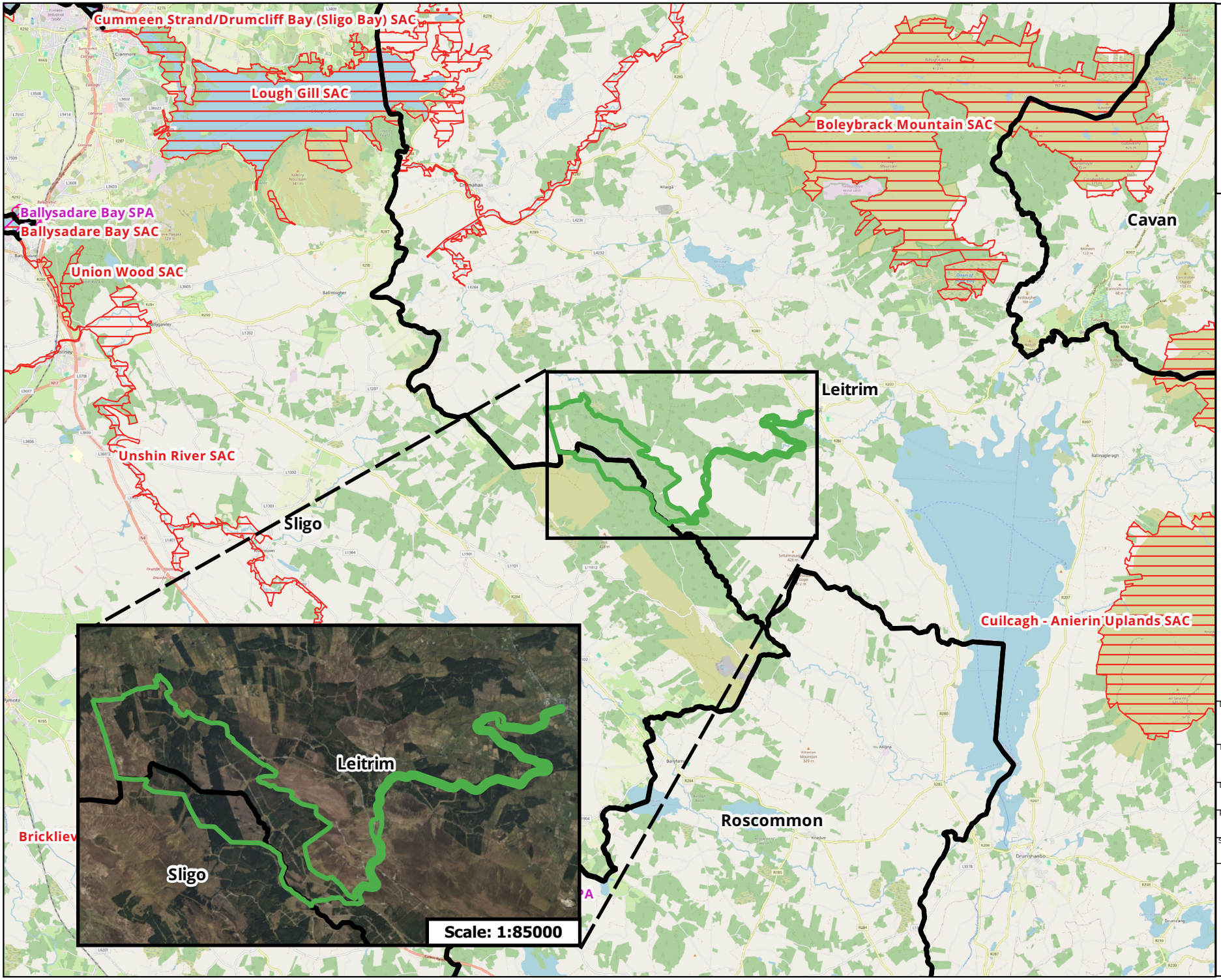
In summary, this addendum assesses whether there are any changes to the overall conclusions of the AASR and NIS submitted with the planning applications for the Proposed Development in light of the updated surveys and SSCOs.

1.1 Site Location

The Proposed Development site is located in an upland area on the north-eastern slopes of Carrane Hill on the boundary of Counties Leitrim and Sligo. The main wind farm infrastructure is located approximately 3.8 kilometres west of Drumkeeran and approximately 7.5 kilometres southeast of Dromahair. The Grid Reference coordinates for the approximate centre of the site are ITM X 584650, Y 823261.

The site of the Proposed Development is currently accessed, from the R280 to the west, via the local road network.

The Proposed Development Area, including all lands within the EIAR Site Boundary, covers an area of approximately 800 hectares as shown in Figure 1-1.



Map Legend

- EIAR Site Boundary
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- County Boundaries

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Drawing Title

Site Location

Project Title: Croagh Wind Farm, Co. Leitrim/Sligo	
Drawn By: AMcD	Checked By: KOD
Project No.: 180511-d	Drawing No.: Figure 1-1
Scale 1:85000: 1:150,000	Date: 02.03.2026

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2. DESCRIPTION OF THE PROPOSED DEVELOPMENT

A detailed description of the characteristics of the Proposed Development was included in Section 2.2 of the AASR and Section 3.2 of the NIS submitted with the planning application.

The Proposed Development comprises:

1. *Construction of 10 No. wind turbines with a maximum overall blade tip height of up to 170 metres, and associated hardstand areas;*
2. *1 no. 38kV permanent electrical substation including a control building with welfare facilities, all associated electrical plant and equipment, security fencing, all associated underground cabling, waste water holding tank and all ancillary works;*
3. *1 no. permanent Meteorological Mast with a maximum height of up to 100 metres;*
4. *All associated underground electrical and communications cabling connecting the turbines to the proposed wind farm substation;*
5. *All works associated with the connection of the proposed wind farm to the national electricity grid, via underground cabling to the existing Garvagh substation;*
6. *Upgrade of existing tracks and roads, provision of new site access roads and hardstand areas;*
7. *The partial demolition and alteration of two agricultural buildings in the townlands of Sheena and associated junction access and road works to the existing yard, agricultural buildings and agricultural lands in the townlands of Sheena and Derrybofin to provide a link road primarily for construction traffic off the R280. This link road will be used for the delivery of abnormal loads to the site during the construction period and may be used during the operational period if necessary or to facilitate the decommissioning of the wind farm. Following construction, access to the link road will be closed off and the yard/agricultural building will revert to its use for agricultural purposes except if and when required for delivery of abnormal loads during the operational period of the windfarm or to facilitate the decommissioning of the wind farm;*
8. *1 no. borrow pit;*
9. *2 no. peat and spoil repository areas*
10. *2 no. temporary construction compounds;*
11. *Recreation and amenity works, including marked trails, boardwalk and viewing area provision of a permanent amenity car park, and associated recreation and amenity signage*
12. *Site Drainage;*
13. *Permanent Signage;*
14. *Ancillary Forestry Felling to facilitate construction and operation of the proposed development; and*
15. *All associated site development works*

The application seeks a ten-year planning permission and 30-year operational life from the date of commissioning of the entire wind farm.

3. FIELD SURVEYS 2025

3.1 Methodology

Updated ecological surveys were undertaken by MKO ecologists in September 2025. They serve to verify the results of the surveys undertaken between 2017 and 2020 to inform the NIS submitted with the planning application and to describe any changes to the ecological baseline since the undertaking of those surveys.

3.2 Ecological Walkover Survey

Multi-disciplinary ecological walkover surveys were undertaken by Katy Beckett (B.A., M.Sc.), Amy McDermott (B.Sc. in Environmental Science), Bridin Foster (B.Sc. in Biological Earth and Environmental Sciences (Zoology)) and Matthew Kieran (B. Sc. Environmental Science with Ecology) of MKO on the 15th and 16th of September 2025. These surveys were undertaken in line with TII (2009) guidelines (Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes). Habitats were identified in accordance with level three of the Heritage Council's '*Guide to Habitats in Ireland*' (Fossitt, 2000). Plant nomenclature for vascular plants follows '*New Flora of the British Isles*' (Stace, 2019), while mosses and liverworts nomenclature follows '*Mosses and Liverworts of Britain and Ireland - a field guide*' (British Bryological Society, 2010).

During the surveys, the site was also searched for species listed on the First Schedule of the European Union (Invasive Alien Species) Regulations 2024 (S.I. 374 of 2024) and the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (S.I. 477 of 2011).

3.2.1 Non-volant Mammal Surveys

A 50m buffer of the proposed infrastructure footprint was surveyed for mammals. All mammal surveys adhered to the guidance as set out in *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Roads Schemes* (NRA 2009) and followed CIEEM's *Best practice competencies for species surveys* (CIEEM, 2013). The site was systematically searched for signs of otter, badger, pine marten, red squirrel and other protected mammal species. Signs searched for included incidental dens, setts, prints, latrines, sprainting sites, couches, foraging signs or sightings.

3.3 Results

3.3.1 Ecological Walkover Survey

The updated surveys confirmed that the habitats present within the site largely correspond to those recorded during the surveys undertaken between 2017 and 2020, with no significant changes in habitat extent or quality observed.

Minor changes in habitats were recorded. One area previously identified as Conifer plantation (WD4) during the 2017-2020 surveys had been recently felled and as a result of the recent forestry operations and the absence of replanting at the time of survey, this area was reclassified as recently felled woodland. Another area previously identified as Scrub (WS1) along the proposed haul route was found to comprise of wet grassland during the 2025 surveys and as such was reclassified as Wet grassland (GS4) habitat. An updated habitat map is provided as Figures 3-1 and 3-2. The changes recorded within the site are not located within or in close proximity to any European Sites and do not concern any Annex I habitats associated with any European Sites.

In addition to the above, the survey also identified the invasive species Japanese knotweed and Rhododendron within the site boundary (Figure 3-3). These invasive species are listed on the First Schedule of the European Union (Invasive Alien Species) Regulations 2024 (S.I. 374 of 2024) and the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011). The stand of rhododendron is outside of the construction footprint and will not be disturbed by the Proposed Development. The Proposed Development has the potential to disturb Japanese knotweed in two locations within the site, along the proposed access route in the easternmost section of the site as well as along a proposed road upgrade to the east of Turbine 2. Section 6.7.3.3 (Potential Introduction or Spread of Invasive Alien Plant Species) of Chapter 6 in the EIAR submitted with the planning application outlines strict mitigation measures to prevent the spread of this species, which will be adhered to in full for all identified stands of Japanese knotweed with potential to be disturbed by the Proposed Development. These mitigation measures were further expanded upon in Section 2.57.1 of the Further Information Response submitted to Leitrim County Council in April 2021 (P. 20/120). Taking this into account, there is no potential for effects on any European Sites due to the spread of invasive species as a result of the Proposed Development.

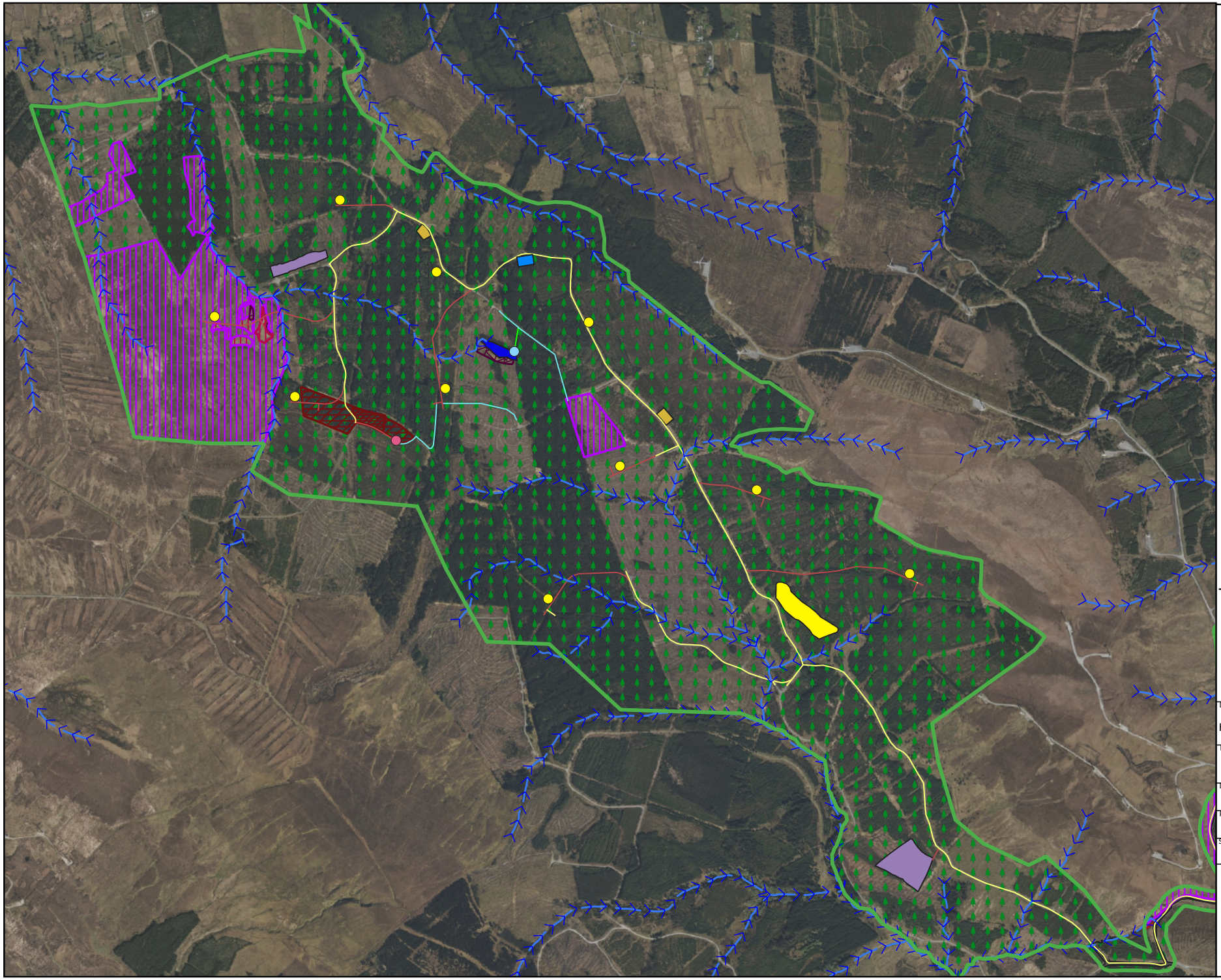
The changes recorded during the 2025 surveys do not have implications for any European Sites and do not alter the conclusions of the AASR and NIS submitted with the planning applications.

3.3.2 Non-volant Mammal Survey

During the 2025 surveys, signs of badger, pine marten, fox and deer were observed. No mammals associated with any European Sites were recorded during the 2025 surveys. No otter resting or breeding sites were recorded, however, similar to the surveys of the site undertaken between 2017 and 2020, the main watercourses within the site were assessed as providing suitable commuting and foraging habitat for the otter during the 2025 surveys.

The nearest SAC designated for otter, i.e. Lough Gill SAC, is located approximately 4.4km by land and >7km via surface water from the Proposed Development. There is potential for this SAC otter population to be utilising the site for foraging and commuting. This was considered fully within the NIS submitted with the planning application.

The results of the 2025 mammal surveys do not have implications for any European Sites and do not alter the conclusions of the AASR and NIS submitted with the planning applications. No mitigation measures additional to those outlined in the NIS submitted with the planning application are considered necessary in relation to mammal species associated with European Sites.



Map Legend

EIAR Site Boundary

Infrastructure

- Borrow Pit
- Compounds
- Met Mast
- Peat Repositories
- New Roads
- Road Upgrade
- Substation
- Turbine Layout
- Viewing Platform Location
- Amenity Boardwalk
- Amenity Walkways

Habitats

- Buildings and artificial surfaces (BL3)
- Dystrophic lakes (FL1)
- Improved agricultural grassland (GA1)
- Wet grassland (GS4)
- Wet heath (HH3)
- Upland blanket bog (PB2)
- Poor fen and flush (PF2)
- Transition mire and quaking bog (PF3)
- Conifer plantation (WD4)
- Scrub (WS1)
- Recently-felled woodland (WS5)

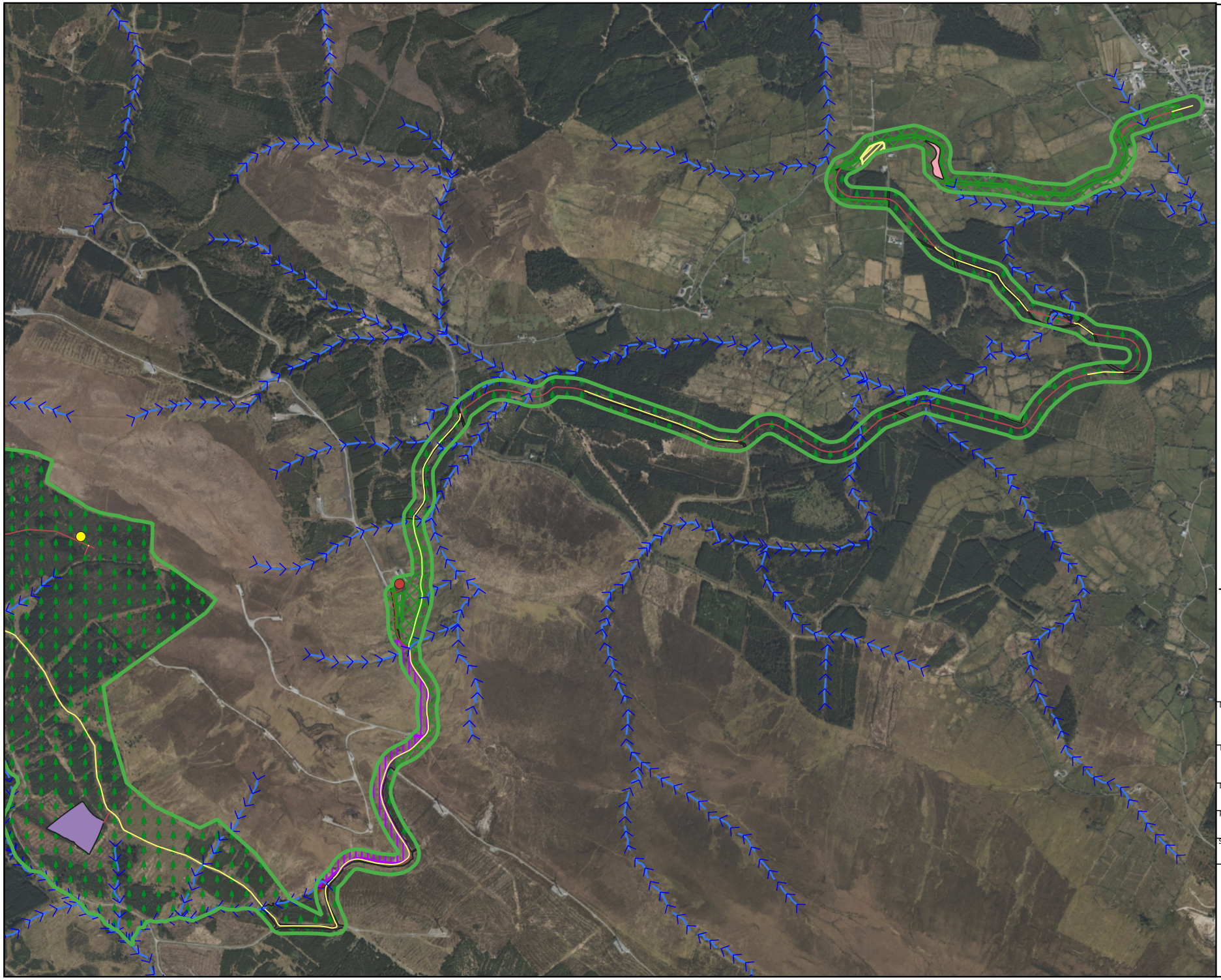
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Drawing Title
Infrastructure Footprint Overlaying Habitat Map of the Western Side of the Proposed Development Site

Project Title
Croagh Wind Farm, Co. Leitrim/Sligo

Drawn By	Checked By
AMcD	KB
Project No.	Drawing No.
180511-d	Figure 3-1
Scale	Date
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Map Legend

- EIAR Site Boundary

Infrastructure

- Peat Repositories
- New Roads
- Road Upgrade
- Turbine Layout
- Garvagh Grid
- Garvagh Substation Location
- Road Widening Works Area

Habitats

- Buildings and artificial surfaces (BL3)
- Improved agricultural grassland (GA1)
- Wet grassland (GS4)
- Upland blanket bog (PB2)
- Conifer plantation (WD4)
- Scrub (WS1)

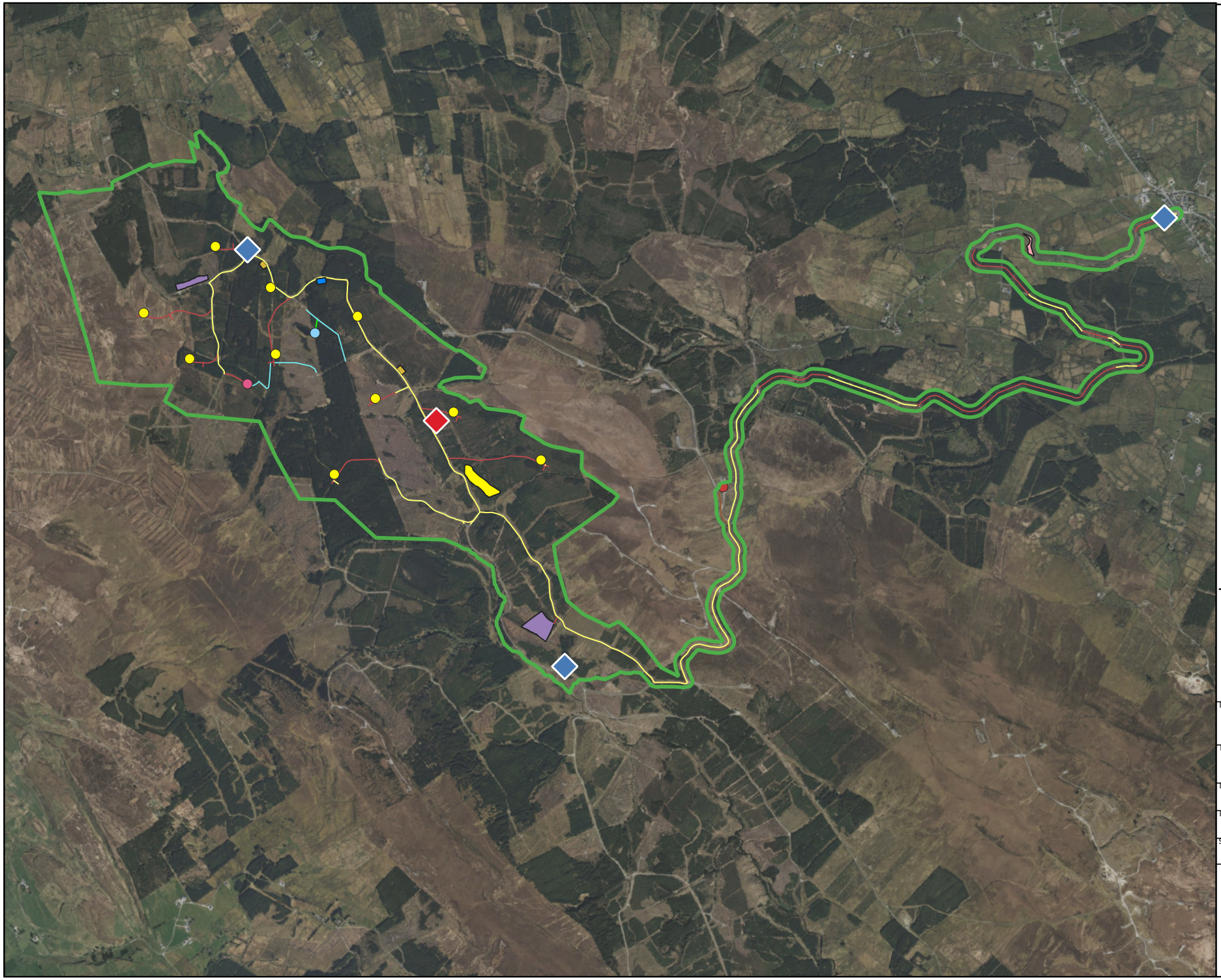
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Drawing Title
Infrastructure Footprint Overlaying Habitat Map of the Eastern Side of the Proposed Development Site

Project Title
Croagh Wind Farm, Co. Leitrim/Sligo

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Map Legend

- EIAR Site Boundary

Infrastructure

- Borrow Pit
- Compounds
- Met Mast
- Peat Repositories
- New Roads
- Road Upgrade
- Substation
- Turbine Layout
- Viewing Platform Location
- Amenity Boardwalk
- Amenity Walkways
- Garvagh Grid
- Garvagh Substation Location
- Road Widening Works Area

Invasive Species

- Rhododendron (Rhododendron ponticum)
- Japanese knotweed (Reynoutria japonica)

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Drawing Title

Invasive Species Locations

Project Title	
Croagh Wind Farm, Co. Leitrim/Sligo	
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Project No.: 180511-d	Drawing No.: Figure 3-3
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4. APPROPRIATE ASSESSMENT SCREENING REPORT (AASR) ADDENDUM

Since the preparation of the Appropriate Assessment Screening Report (AASR) which accompanied the planning application for the Proposed Development, updated Site Specific Conservation Objectives (SSCOs) have been published by NPWS for a number of European Sites which were considered in the AASR. A thorough review of all updated SSCOs was undertaken and an assessment of whether the updated SSCOs result in any changes to the findings of the AASR submitted with the planning application in 2020 is provided below. The results of the updated ecology surveys undertaken in 2025 (and described in Section 3.3 above) were also considered in determining whether there are any changes to the findings of the AASR submitted with the planning applications.

4.1 Review of Updated Site Specific Conservation Objectives (SSCOs) for Relevant European Sites

A review of the AASR submitted with the planning application for the Proposed Development was undertaken. Since the planning application was lodged in 2020, detailed/updated Site Specific Conservation Objectives (SSCOs) have been published for the following European Sites which were considered in Table 3-1 of the AASR (Designated Sites in the Likely Zone of Impact). A review of these updated SSCOs for European sites considered within the AASR is provided below.

4.1.1 Lough Gill SAC [001976]

Lough Gill SAC previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected'* (NPWS Generic version 6.0, 2018). Detailed SSCOs were published for this site in 2021.
[https://www.npws.ie/sites/default/files/protectedsites/conservation_objectives/CO001976.pdf].

The following QI have an objective to restore their favourable conservation status:

- Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
- Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae)* [91E0]
- Sea Lamprey (*Petromyzon marinus)* [1095]
- Brook Lamprey (*Lampetra planeri)* [1096]
- River Lamprey (*Lampetra fluviatilis)* [1099]
- Salmon (*Salmo salar)* [1106]

The following QI have an objective to maintain their favourable conservation status:

- White-clawed Crayfish *(Austropotamobius pallipes)* [1092]
- Otter (*Lutra lutra)* [1355]

4.1.2 Unshin River SAC [001898]

Unshin River SAC previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected'* (NPWS Generic version 6.0, 2018). Detailed SSCOs were published for this site in 2021 [https://www.npws.ie/sites/default/files/protectedsites/conservation_objectives/CO001898.pdf].

The following QI have an objective to restore their favourable conservation status:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) [6410]
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae)* [91E0]

The following QI have an objective to maintain their favourable conservation status:

- Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation [3260]
- Salmon (*Salmo salar)* [1106]
- Otter (*Lutra lutra)* [1355]

4.1.3 Lough Arrow SAC [001673]

Lough Arrow SAC previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected'* (NPWS Generic version 6.0, 2018). Detailed SSCOs were published for this site in 2021 [https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001673.pdf] This included the following Conservation Objective: To restore the favourable conservation condition of Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140].

4.1.4 Bricklieve Mountains and Keishcorran SAC [001656]

Bricklieve Mountains and Keishcorran SAC previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected'* (NPWS Generic version 6.0, 2018). Detailed SSCOs were published for this site in 2021 [https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001656.pdf]

The following QI have an objective to restore their favourable conservation status:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
- Lowland hay meadows (*Alopecurus pratensis, Sanguisorba officinalis*) [6510]
- Calcareous and calcshist screes of the montane to alpine levels (*Thlaspietea rotundifolii*) [8120]

The following QI have an objective to maintain their favourable conservation status:

- Turloughs* [3180]
- Marsh Fritillary *(Euphydryas Aurinia)* [1065]
- White-clawed Crayfish *(Austropotamobius pallipes)* [1092]

4.1.5 Union Wood SAC [000638]

Union Wood SAC previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected'* (NPWS Generic version 6.0, 2018). Detailed SSCOs were published for this site in 2021 [https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000638.pdf] This included the following Conservation Objective: To restore the favourable conservation condition of Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0].

4.1.6 Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]

Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC previously had detailed SSCOs [Version 1, September 2013]. Update SSCOs were published in 2024 [https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000627.pdf]

The following QI have an objective to restore their favourable conservation status:

- Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]
- Fixed coastal dunes with herbaceous vegetation (grey dunes)* [2130]
- Juniperus communis formations on heaths or calcareous grasslands [5130]
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
- Sea Lamprey (*Petromyzon marinus)* [1095]

The following QI have an objective to maintain their favourable conservation status:

- Estuaries [1130]
- Mudflats and sandflats not covered by seawater at low tide [1140]
- Embryonic shifting dunes [2110]
- Petrifying springs with tufa formation (Cratoneurion)* [7220]
- Narrow-mouthed Whorl Snail Vertigo angustior [1014]
- River Lamprey (*Lampetra fluviatilis)* [1099]
- Harbour seal [1365]

4.1.7 Lough Arrow SPA [004050]

Lough Arrow SPA previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests of this SPA*'' (NPWS Generic version 6.0, 2018)

This site has a second conservation objective:

'*To maintain or restore the favourable conservation condition of the wetland habitat at Lough Arrow SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.'*

Detailed SSCOs were published for this site in 2025 [https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004050.pdf].

The following QI have an objective to restore their favourable conservation status:

- Little Grebe (*Tachybaptus ruficollis*) [A004]
- Tufted Duck (*Aythya fuligula*) [A061]

The following QI have an objective to maintain their favourable conservation status:

- Wetlands [A999]

4.1.8 Ballykenny-Fisherstown Bog SPA [004101]

Ballykenny-Fisherstown Bog SPA previously had the following generic conservation objective: '*To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests of this SPA*.' (NPWS Generic version 6.0, 2018). Detailed SSCOs were published for this site in 2025 [https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004101.pdf]. This included the following Conservation Objective: To restore the favourable conservation condition of Greenland White-fronted Goose (*Anser albifrons flavirostris*).

The AASR submitted as part of the planning application for the Proposed Development did not identify any potential pathways for likely significant effects on the following European sites:

- Unshin River SAC [001898]
- Lough Arrow SAC [001673]
- Bricklieve Mountains and Keishcorran SAC [001656]
- Union Wood SAC [000638]
- Lough Arrow SPA [004050]
- Ballykenny-Fisherstown Bog SPA [004101]

The AASR submitted as part of the planning application for the Proposed Development identified the potential for the Proposed Development to result in likely significant effects on the following European Sites due to deterioration of water quality:

- Lough Gill SAC [001976]
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]
- Cummeen Strand SPA [004035]

An updated review of the conservation objectives published for these European sites along with an updated assessment was undertaken. There have been no changes to the potential pathways for likely significant effects for any of the QIs or SCIs of these European sites. No Additional pathways were identified. No additional European sites were identified within the Likely Zone of Impact.

4.2 Cumulative Assessment

A review of plans and projects in the area, with a particular focus on updated plans and any projects permitted since the planning application was lodged in 2020 was undertaken. The potential for cumulative impacts on European Sites, considering the review of updated plans and projects submitted since the planning application was lodged has been fully considered in this addendum.

The Leitrim County Development Plan 2023 – 2029, the Sligo County Development Plan 2024 - 2030 and Ireland's 4th National Biodiversity Action Plan 2023 – 2030 were also reviewed, with a particular focus on policies and objectives relating to European Sites.

In conclusion, no potential pathways for significant cumulative effects on any European Site was identified.

4.3 Conclusion of the Screening Assessment

Section 4.1 of the AASR concluded the following:

'Following an examination, analysis and evaluation of the relevant data and information set out within this Screening Report, it cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed development, individually or in combination with other plans and projects, would be likely to have a significant effect on the following sites:

- *Lough Gill SAC [001976]*
- *Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (000627)*
- *Cummeen Strand SPA (004035)*

As a result, an Appropriate Assessment is required, and a Natura Impact Statement has been prepared in respect of the proposed development in order to assess whether the proposed development will adversely impact the integrity of these European Sites.

No pathways for significant effect on any other European Site were identified. Thus it can be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed development, individually or in combination with other plans and projects, would be likely to have a significant effect on any other European Sites than those listed above'.

Following a review of the detailed/updated SSCOs, and taking into consideration the results of the updated ecological surveys undertaken in 2025, the conclusions of the AASR submitted with the planning application for the Proposed Development remain unchanged.

5. NATURA IMPACT STATEMENT (NIS) ADDENDUM

The NIS submitted with the planning application undertook a detailed assessment of the potential for adverse effects on Lough Gill SAC, Cummeen Strand/Drumcliff Bay SAC and Cummeen Strand SPA as a result of the Proposed Development.

Since the preparation of the NIS which accompanied the planning application for the Proposed Development, updated SSCOs have been published by NPWS for Lough Gill SAC and Cummeen Strand/Drumcliff Bay SAC which were considered in the NIS. A thorough review of these updated SSCOs was undertaken and an assessment of whether the updated SSCOs result in any changes to the findings of the NIS submitted with the planning application in 2020 is provided below. The results of the updated ecology surveys undertaken in 2025 (and described in Section 3.3 above) were also considered in determining whether there are any changes to the findings of the NIS submitted with the planning applications

5.1 Review of Updated Site Specific Conservation Objectives (SSCOs) for Relevant European Sites

The detailed SSCOs which have been published for Lough Gill SAC and Cummeen Strand/Drumcliff Bay SAC since the planning application for the Proposed Development was submitted in 2020 are reviewed and assessed in the section below in light of any potential implications for the conclusions of the NIS submitted with the planning application. There have been no updates to the SSCOs for Cummeen Strand SPA since the planning application for the Proposed Development was submitted and therefore this SPA is not considered further in this addendum

5.1.1 Lough Gill SAC

The potential for adverse effects on a number of aquatic QIs of this SAC due to deterioration in water quality as a result of the Proposed Development was identified in Section 5.2 of the NIS for the Proposed Development. Detailed mitigation measures for the protection of water quality and to ensure that there would be no adverse effects on the SAC due to deterioration in water quality were detailed in Sections 5.2.1.1 – 5.2.1.4 of the NIS.

Since the planning application was lodged in 2020, detailed SSCOs for Lough Gill SAC were published (Version 1, December 2021). A thorough review of the detailed SSCO document (https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001976.pdf) was undertaken.

Table 5-1 below lists the qualifying features of this European Site and determines, in the light of their Conservation Objectives (Version 1, December 2021), whether there is any complete source-pathway-receptor chain, by which adverse effects may occur.

5.1.1.1 Identification of Individual Qualifying Features with the Potential to be Affected

Table 5-1: Identification of Individual Qualifying Features with the Potential to be Affected

Qualifying feature	Conservation Objective (NPWS, Version 1, December 2021)	Rationale	Potential for Adverse Effects Y/N
[1092] White-clawed Crayfish (*Austropotamobius pallipes)*	To maintain the favourable conservation condition of White-clawed Crayfish in Lough Gill SAC	There is no potential for direct effects on these aquatic QI species given the distance (over 7km downstream) of the Proposed Development from the SAC and the absence of instream works associated with the Proposed Development. Due to the hydrological connectivity between the Proposed Development and Lough Gill SAC (located over 7km downstream), via the Tullynascreen Stream and the Killanummery River that drain the upper reaches of the northern part of the site, a potential pathway for indirect effects on these QI species in the form of deterioration of water quality resulting from run-off pollutants to surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified in the absence of mitigation.	Y
[1095] Sea Lamprey (*Petromyzon marinus*)	To restore the favourable conservation condition of Sea Lamprey in Lough Gill SAC		Y
[1096] Brook Lamprey (*Lampetra planeri*)	To restore the favourable conservation condition of Brook Lamprey in the Lough Gill SAC		Y
[1099] River Lamprey (*Lampetra fluviatilis*)	To restore the favourable conservation condition of River Lamprey in the Lough Gill SAC		Y
[1106] Atlantic Salmon (*Salmo salar*)	To restore the favourable conservation condition of Salmon in the Lough Gill SAC		Y
[1355] Otter (*Lutra lutra*)	To restore the favourable conservation condition of Otter in the Lough Gill SAC	Due to the hydrological connectivity between the Proposed Development and Lough Gill SAC (over 7km downstream) a potential pathway for indirect effects on this QI species due to deterioration of water quality resulting from pollution entering surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified in the absence of mitigation.	Y

Qualifying feature	Conservation Objective (NPWS, Version 1, December 2021)	Rationale	Potential for Adverse Effects Y/N
		There is no potential for adverse effects due to disturbance of this species. There will be no loss of holting or couching sites within the SAC as the Proposed Development is located over 7km away via surface water. In addition, no holting or couch sites were recorded on the site of the Proposed Development during the surveys undertaken to inform the NIS submitted with the planning application or during the updated surveys of the site undertaken in 2025.	
[3150] Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation	To restore the favourable conservation condition of Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation in Lough Gill SAC	There is no potential for direct effects on this QI habitat which is not located within or adjacent to the Proposed Development. As there is hydrological connectivity between the Proposed development and Lough Gill SAC (over 7km downstream) a potential pathway for indirect effects on this QI Habitat due to deterioration of water quality resulting from pollution entering surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified.	Y
[6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	To restore the favourable conservation condition of Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) in Lough Gill SAC	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development. This QI habitat is terrestrial in nature and was not identified within the Proposed Development boundary. No complete source-pathway-receptor chain for adverse effect on this QI habitat as a result of the Proposed Development was identified. **No further assessment is required.**	N
[91A0] Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles	To restore the favourable conservation condition of Old sessile oak woods with Ilex and Blechnum in the British Isles in Lough Gill SAC	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development. Given this QI habitat is fully terrestrial in nature and was not identified within the Proposed Development boundary, and given the distance to the SAC, no complete source-pathway-receptor chain for any effect on this QI habitat as a result of the Proposed Development was identified.	N

Qualifying feature	Conservation Objective (NPWS, Version 1, December 2021)	Rationale	Potential for Adverse Effects Y/N
		No further assessment is required.	
[91E0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)*	To restore the favourable conservation condition of Alluvial forests with Alnus glutinosa and Fraxinus excelsior (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)* in Lough Gill SAC	There is no potential for direct effects on this QI habitat. This habitat was not recorded within or adjacent to the Proposed Development and the SAC. As there is hydrological connectivity between the Proposed Development and Lough Gill SAC (over 7km downstream) a potential pathway for indirect effects on this QI habitat due to deterioration of water quality resulting from pollution entering surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified.	Y

5.1.1.2 QI Speies and Habitat Specific Information

The updated SSCOs for Lough Gill SAC (Version 1, December 2021) include detailed attributes and targets for each of the QIs. The attributes and targets for the QIs, for which a potential pathway for adverse effects was identified in Table 5-1 above, were reviewed and an assessment of whether there is potential for these Conservation Objective targets to be undermined as a result of the Proposed Development in the absence of mitigation is provided.

5.1.1.2.1 *[1092] White-clawed Crayfish (Austropotamobius pallipes)*

The up to date attributes and targets for this QI are provided below.

Table 5-2 Targets and attributes associated with nominated site-specific conservation objectives for White-clawed Crayfish in the Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution	No reduction from baseline.	**Yes** –There are no proposed alterations to the natural watercourses occurring on site. However, on a precautionary basis, in the absence of mitigation deterioration in water quality and potential habitat degradation as a result of silt-laden run-off and other pollutants could undermine these target.
Population structure: recruitment	Juveniles and/or females with eggs in at least 50% of positive samples	
Population size:	No reduction from baseline of 0.25 catch per unit effort (CPUE)	
Negative indicator species	No non-indigenous crayfish species present	**No** – No in-stream works will take place. There is no potential for the Proposed Development to introduce or

		cause the spread of non-indigenous crayfish species to the Lough Gill SAC.
Disease	No instances of disease	**No** – No in-stream works will take place. There is no potential for the Proposed Development to introduce or cause the spread of disease to the Lough Gill SAC.
River Water quality	At least Q3-4 at all sites sampled by EPA	**Yes** – On a precautionary basis, in the absence of mitigation, deterioration in water quality and potential resulting habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Lake Water quality:	Maintain appropriate water quality, particularly pH and nutrient levels, to support the natural structure and functioning of the habitat	
Habitat Quality: heterogeneity	No decline from the baseline	**Yes** – On a precautionary basis, in the absence of mitigation, deterioration in water quality and potential resulting habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.

5.1.1.2.2 *[1095] Sea Lamprey (Petromyzon marinus)*

The up to date attributes and targets for this QI are provided below:

Table 5-3 Targets and attributes associated with nominated site-specific conservation objectives for Sea Lamprey in the Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution: extent of anadromy	Greater than 75% of main stem length of rivers accessible from estuary	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.
Annual run size	Annual run size should reflect that expected under near-natural conditions	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target by affecting potential spawning habitat. No in-stream works will take place, therefore there will be no direct impacts on this species.
Larval lamprey in fine sediment	Larval lamprey present in SAC catchment	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target. No in-stream works will take place, therefore there will be no direct impacts on this species.

Extent and distribution of spawning and nursery habitat	No decline in extent and distribution of spawning and nursery beds	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target. No in-stream works will take place, therefore there will be no direct impacts on this species.

5.1.1.2.3 *[1096] Brook Lamprey (Lampetra planeri)*

The up to date attributes and targets for this QI are provided below:

Table 5-4 Targets and attributes associated with the site-specific conservation objectives for Brook Lamprey in the Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution	Access to all water courses down to first order streams	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.
Distribution in suitable habitat	Not less than 50% of sample sites with suitable habitat positive for larval brook/river lamprey	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target. No in-stream works will take place, therefore there will be no direct impacts on this species.
Population structure of larvae	At least three age/ size classes of larval brook/ river lamprey present	
Larval lamprey density in fine sediment	Mean density of brook/river larval lamprey in sites with suitable habitat at least 5/m^2	
Extent and distribution of spawning and nursery habitat	No decline in extent and distribution of spawning and nursery beds	

5.1.1.2.4 *[1099] River Lamprey (Lampetra fluviatilis)*

The up to date attributes and targets for this QI are provided below:

Table 5-5 Targets and attributes associated with the site-specific conservation objectives for River Lamprey in the Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution	Access to all water courses down to first order streams	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.
Distribution in suitable habitat	Not less than 50% of sample sites with suitable habitat positive for larval brook/river lamprey	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target. No in-stream works will take place, therefore there will be no direct impacts on this species.
Population structure of larvae	At least three age/size classes of larval brook/river lamprey present	
Larval lamprey density in the sediment	Mean density of brook/river larval lamprey in sites with suitable habitat at least 5/m^2	
Extent and distribution of spawning and nursery habitat	No decline in extent and distribution of spawning and nursery beds	

5.1.1.2.5 *[1106] Salmon (Salmo salar)*

The up to date attributes and targets for this QI are provided below:

Table 5-6 Targets and attributes associated with the site-specific conservation objectives for Salmon in the Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution: extent of anadromy	100% of river channels down to second order accessible from estuary	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.
Adult spawning fish	Conservation Limit (CL) for each system consistently exceeded	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this
Salmon fry abundance	Maintain or exceed 0+ fry mean catchment-wide abundance threshold	

	value. Currently set at 17 salmon fry/5 min sampling	target. No in-stream works will take place, therefore there will be no direct impacts on this species.
Out-migrating smolt abundance	No significant decline	
Number and distribution of redds	No decline in number and distribution of spawning redds due to anthropogenic causes	
Water quality	At least Q4 at all sites sampled by EPA	

5.1.1.2.6 *[1355] Otter (Lutra lutra)*

The up to date attributes and targets for this QI are provided below:

Table 5-7 Targets and attributes associated with the site-specific conservation objectives for Otter in the Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution	No significant decline	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation/changes to fish prey availability as a result of silt-laden run-off and other pollutants could undermine this target. No in-stream works will take place, therefore there will be no direct impacts on this species.
Extent of terrestrial habitat	No significant decline. Area mapped and calculated as 193.91ha along river banks/ lake shoreline/around ponds	**No** – The Proposed Development will not result in any reduction to terrestrial supporting habitat for otter associated with the SAC.
Extent of freshwater (river) habitat	No significant decline. Length mapped and calculated as 80.38km	**No** – The Proposed Development will not result in any reduction to freshwater (river) otter habitat.
Extent of freshwater (lake) habitat	No significant decline. Area mapped and calculated as 353.39ha	**No** – The Proposed Development will not result in any reduction to freshwater (lake) otter habitat.
Couching sites and holts	No significant decline.	**No** – The Proposed Development will not result in the loss of couching or resting sites.
Fish biomass available	No significant decline	**Yes** –On a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target. No in-stream works will take place,

		therefore there will be no direct impacts on this species.
Barriers to connectivity	No significant increase	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.

5.1.1.2.7 *[91E0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*

The up to date attributes and targets for this QI are provided below:

Table 5-8 Targets and attributes associated with the site-specific conservation objectives for Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) in The Lough Gill SAC'

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Habitat area	Area stable or increasing, subject to natural processes.	**Yes** -There will be no direct effect on these attributes and targets associated with the Proposed Development. The Proposed Development is located 7km (surface water distance) upstream of the SAC and thus will not directly affect alluvial woodland within the SAC. However, on a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine these targets.
Habitat distribution	No decline, subject to natural processes. The surveyed woodland locations are shown on map 5 in the site-specific conservation objectives (NPWS, 2021)	
Woodland size	Area stable or increasing. Where topographically possible, "large" woods at least 25ha in size and "small" woods at least 3ha in size	
Woodland structure: cover and height	Total canopy cover at least 30%; median canopy height at least 7m; native shrub layer cover 10-75%; native herb/dwarf shrub layer cover at least 20% and height at least 20cm; bryophyte cover at least 4%	**Yes** -There will be no direct effect on these attributes and targets associated with the Proposed Development. The Proposed Development is located 7km (surface water distance) upstream of the SAC and thus will not directly affect alluvial woodland within the SAC. However, on a precautionary basis, in the absence of mitigation, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine these targets.
Woodland structure: community diversity and extent	Maintain diversity and extent of community types	
Woodland structure: natural regeneration	Seedlings, saplings and pole age-classes of target species for 91E0* woodlands and other native tree species occur in adequate proportions to ensure survival of woodland canopy	

Hydrological regime: Flooding depth/height of water table	Appropriate hydrological regime necessary for maintenance of alluvial vegetation	**No** – The Proposed Development will not result in a change in hydrological regimes and will not undermine this conservation objective target.
Woodland structure: dead wood	At least 19 stems/ha of dead wood of at least 20cm diameter	**No** - As the proposed development is located in excess of 7km (surface water distance) downstream of the proposed development there will be no effect on the amount of dead wood within the woodland structure.
Woodland structure: veteran trees	No decline	**No** – The Proposed Development will not result in a decline in veteran trees or decline in indicators or local distinctiveness.
Woodland structure: indicators of local distinctiveness	No decline in distribution and, in the case of red listed and other rare or localised species, population size	
Woodland structure: indicators of overgrazing	All five indicators of overgrazing absent	**No** – The Proposed Development will not result in a change in grazing patterns.
Vegetation composition: native tree cover	No decline. Native tree cover at least 90% of canopy; target species cover at least 50% of canopy	**No** – The Proposed Development is located 7km (surface water distance) upstream of the SAC and thus will not directly affect alluvial woodland within the SAC. The Proposed Development will not result in changes to vegetation composition of this habitat.
Vegetation composition: typical species	At least 1 target species for 91E0* woodlands present; at least 6 positive indicator species for 91E0* woodlands present	
Vegetation composition: negative indicator species	Negative indicator species cover not greater than 10%; regeneration of negative indicator species absent	

5.1.1.2.8 *[3150] Natural eutrophic lakes with Magnopotamiun or Hydrocharition-type vegetation*

The up to date attributes and targets for this QI are provided below:

Table 5-9 Targets and attributes associated with the site-specific conservation objectives for Natural eutrophic lakes with Magnopotamiun or Hydrocharition- type vegetation in Lough Gill SAC

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Habitat area	Area stable or increasing, subject to natural processes	**Yes** - There will be no direct reduction in habitat area or distribution. The proposed development is located >7km (surface water distance) from the SAC. The only identified pathway for effect is via indirect surface water deterioration. In the absence of mitigation this has potential to undermine these conservation objective targets.
Habitat distribution	No decline, subject to natural processes	
Vegetation composition: typical species	Typical species present, in good condition, and demonstrating typical abundances and distribution	**Yes** - The proposed development is located >7km (surface water distance) from the SAC. There will be no direct alteration to the vegetation composition its distribution or species present within the eutrophic lake habitat, as a result of the proposed development. The only identified pathway for effect is via indirect surface water deterioration. In the absence of mitigation this has potential to undermine these conservation objective targets.
Vegetation composition: characteristic zonation	All characteristic zones should be present, correctly distributed and in good condition	
Vegetation distribution: maximum depth	Maintain maximum depth of vegetation, subject to natural processes	
Hydrological regime: water level fluctuations	Maintain appropriate hydrological regime necessary to support the habitat	**No** – The Proposed Development will not result in any changes in hydrological regimes
Lake substratum quality	Maintain appropriate substratum type, extent and chemistry to support the vegetation	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Transparency	Maintain/restore appropriate Secchi transparency. There should be no decline in Secchi depth/transparency	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target..
Nutrients	Maintain/restore the concentration of nutrients in the water column to sufficiently low levels to support the habitat and its typical species	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.

Phytoplankton biomass	Maintain appropriate water quality to support the habitat, including high chlorophyll *a* status	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Phytoplankton composition	Maintain/restore appropriate water quality to support the habitat, including high phytoplankton composition status	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Attached algal biomass	Maintain/restore trace/absent attached algal biomass (<5% cover)	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Macrophyte status	Restore high/good macrophyte status	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Acidification status	Maintain appropriate water and sediment pH, alkalinity and cation concentrations to support the habitat, subject to natural processes	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Water colour	Maintain/restore appropriate water colour to support the habitat	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Dissolved organic carbon (DOC)	Maintain/restore appropriate organic carbon levels to support the habitat	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Turbidity	Maintain/restore appropriate turbidity to support the habitat	**Yes** – On a precautionary basis, deterioration in water quality and associated habitat degradation as a result of silt-laden run-off and other pollutants could undermine this target.
Fringing habitat: area and condition	Maintain the area and condition of fringing habitats necessary to support the natural structure and functioning of the habitat	**No** – The proposed development is located >7km (surface water distance) from the SAC. The Proposed Development will not result in loss of this habitat.

5.1.2 Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]

The potential for adverse effects on a number of aquatic QIs of this SAC as a result of deterioration in water quality as a result of the Proposed Development was identified in Section 5.2 of the NIS for the proposed development. Detailed mitigation measures for the protection of water quality and to ensure that there would be no adverse effects on the SAC due to deterioration in water quality were detailed in Sections 5.2.1.1 – 5.2.1.4 of the NIS.

Since the planning application was lodged in 2020, updated SSCOs for Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC were published (Version 2, July 2024). These replaced the previous SSCOs for the SAC (Version 1, September 2013) which were used to inform the NIS for the planning application for the Proposed Development. The updated 'Version 2' document includes an additional QI, '*6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)*'. A thorough review of the updated SSCO document (https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000627.pdf) was undertaken.

Table 5-10 below lists the qualifying features of this European Site and determines, in the light of their Conservation Objectives (Version 2, December 2024), whether there is any complete source-pathway-receptor chain, by which adverse effects may occur.

5.1.2.1 Identification of Individual Qualifying Features with the Potential to be Affected

Table 5-10 Identification of Individual Qualifying Features with the Potential to be Affected

Qualifying feature	Conservation Objective (NPWS, Version 2, June 2025[1])	Rationale	Potential for Adverse Effects Y/N
[1014] Narrow-mouthed Whorl Snail *Vertigo angustior*	To maintain the favourable conservation condition of Narrow-Mouthed Whorl Snail in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	No potential pathway for adverse effects on this species was identified. The SAC is located >17km from the Proposed Development. The Proposed Development site does not provide suitable habitat for this species and no pathways for adverse effects on supporting dune habitat for this species in the SAC exists.	N
[1095] Sea Lamprey (*Petromyzon marinus*)	To restore the favourable conservation condition of Sea Lamprey in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	There is no potential for direct effects on populations of these aquatic QI species associated with the SAC as the SAC is located > 28km downstream via surface water. Furthermore there will be no instream works associated with the Proposed Development.	Y

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Qualifying feature	Conservation Objective (NPWS, Version 2, June 2025[1])	Rationale	Potential for Adverse Effects Y/N
[1099] River Lamprey Lampetra fluviatilis	To maintain the favourable conservation condition of River Lamprey in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	Due to the existence of hydrological connectivity between the Proposed Development and the SAC, a potential pathway for indirect effects on these QI species in the form of deterioration of water quality resulting from run-off of pollutants to surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified in the absence of mitigation.	Y
[1365] Harbour Seal *Phoca vitulina*	To maintain the favourable conservation condition of Harbour Seal in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	There is no potential for direct effects on this QI species as the SAC is located > 28km downstream via surface water. Due to the existence of hydrological connectivity between the Proposed Development and the SAC, a potential pathway for indirect effects on this QI species in the form of deterioration of water quality and associated habitat degradation resulting from run-off of pollutants to surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified in the absence of mitigation.	Y
[1130] Estuaries	To maintain the favourable conservation condition of Estuaries in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	There is no potential for direct effects on this QI habitat given the distance between the Proposed Development and the SAC. Due to the existence of hydrological connectivity between the Proposed Development and the SAC, a potential pathway for indirect effects on this QI habitat in the form of deterioration of water quality and associated habitat degradation resulting from run-off of pollutants to surface waters during the construction, operational and decommissioning phases of the Proposed Development was identified in the absence of mitigation.	Y
[1140] Mudflats and sandflats not covered by seawater at low tide	To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	There is no potential for direct effects on this QI habitat given the distance between the Proposed Development and the SAC. Due to the existence of hydrological connectivity between the Proposed Development and the SAC, a potential pathway for indirect effects on this QI habitat in the form of deterioration of water quality and associated habitat degradation resulting from run-off of pollutants to surface waters during the construction, operational	Y

Qualifying feature	Conservation Objective (NPWS, Version 2, June 2025[1])	Rationale	Potential for Adverse Effects Y/N
		and decommissioning phases of the Proposed Development was identified in the absence of mitigation.	
[2110] Embryonic shifting dunes	To maintain the favourable conservation condition of Embryonic shifting dunes in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development given the distance between the Proposed Development and the SAC and given the terrestrial nature of the habitat. **No further assessment is required.**	N
[2120] Shifting dunes along the shoreline with Ammophila arenaria (white dunes)	To restore the favourable conservation condition of Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes') in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development given the distance between the Proposed Development and the SAC and given the terrestrial nature of the habitat. **No further assessment is required.**	N
[2130] Fixed coastal dunes with herbaceous vegetation (grey dunes)*	To restore the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation ('grey dunes') in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development given the distance between the Proposed Development and the SAC and given the terrestrial nature of the habitat. **No further assessment is required.**	N
[5130] Juniperus communis formations on heaths or calcareous grasslands	To restore the favourable conservation condition of *Juniperus communis* formations on heaths or calcareous grasslands in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development given the distance between the Proposed Development and the SAC and given the terrestrial nature of the habitat. **No further assessment is required.**	N
[6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	To restore the Favourable conservation condition of Semi-natural dry grasslands and scrubland facies on calcareous substrates	No potential pathway for direct or indirect effects on this QI habitat was identified as a result of the Proposed development given the distance between the Proposed Development and the SAC and given the terrestrial nature of the habitat. **No further assessment is required.**	N

Qualifying feature	Conservation Objective (NPWS, Version 2, June 2025[1])	Rationale	Potential for Adverse Effects Y/N
	(Festuco-Brometalia) (* important orchid sites) in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC		
[7220] Petrifying springs with tufa formation (Cratoneurion)*	To maintain the favourable conservation condition of Petrifying springs with tufa formation (Cratoneurion) in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	There is no potential for direct or indirect effects on this QI habitat given the distance between the Proposed Development and the mapped locations of this habitat within the SAC and given the nature of the habitat, i.e. usually reliant on permanent irrigation from upwelling groundwater or seepage sources. **No further assessment is required.**	Y

5.1.2.2 QI Species and Habitat Specific Information

The updated SSCOs for Cummeen Strand/Drumcliff Bay SAC (Version 2, July 2024) include detailed attributes and targets for each of the QIs. The attributes and targets for the QIs, for which a potential pathway for adverse effects was identified in Table 5-10 above, were reviewed and an assessment of whether there is potential for these Conservation Objective targets to be undermined as a result of the Proposed Development in the absence of mitigation is provided in the sections below.

5.1.2.2.1 *[1095] Sea Lamprey (Petromyzon marinus)*

The up to date attributes and targets for this QI are provided in the table below:

Table 5-11 Targets and attributes associated with nominated site-specific conservation objectives for Sea Lamprey (Petromyzon marinus) in the Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC [000627]

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution: extent of anadromy	No barriers for migratory life stages of lamprey moving from freshwater to marine habitats and vice versa	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.

5.1.2.2.2 *[1099] River Lamprey (Lampetra fluviatilis)*

The up to date attributes and targets for this QI are provided in the table below:

Table 5-12 Targets and attributes associated with nominated site-specific conservation objectives for River Lamprey (Lampetra fluviatilis) in the Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC [000627]

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Distribution: extent of anadromy	No barriers for migratory life stages of lamprey moving from freshwater to marine habitats and vice versa	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.

5.1.2.2.3 *[1365] Harbour Seal (Phoca vitulina)*

The up to date attributes and targets for this QI are provided in the table below:

Table 5-13 Targets and attributes associated with nominated site-specific conservation objectives for Harbour Seal (Phoca vitulina) in the Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC [000627]

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Access to suitable habitat	Species range within the site should not be restricted by artificial barriers to site use.	**No** – The Proposed Development will not result in any barrier to movement. There will be no instream works or alterations to river morphology and structures which could limit habitat accessibility are not proposed.
Breeding behaviour	Conserve the breeding sites in a natural condition.	**No** – The Proposed Development will not result in alterations to any breeding sites. The Proposed Development is located more than 28km upstream of the SAC.
Moulting behaviour	Conserve the moult haul-out sites in a natural condition.	**No** – The Proposed Development will not result in any alterations to moult haul-out sites. The Proposed Development is located more than 28km upstream of the SAC.
Resting behaviour	Conserve the resting haul-out sites in a natural condition	**No** – The Proposed Development will not result in in any alterations to resting haul-out sites. The Proposed Development is located more than 28km upstream of the SAC.
Disturbance	Human activities should occur at levels that do not adversely affect the harbour seal population at the site.	**No** – The Proposed Development will not result in any disturbance effects to the harbour seal population within the SAC. The Proposed Development is located >28km upstream of the SAC.

5.1.2.2.4 *[1130] Estuaries*

The up to date attributes and targets for this QI are provided in the table below:

Table 5-14 Targets and attributes associated with the site-specific conservation objectives for Estuaries in the Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC [000627]

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Habitat area	The permanent habitat area is stable or increasing, subject to natural processes	**Yes -** On a precautionary basis, given there is hydrological connectivity between the Proposed Development and the SAC, there is potential for deterioration in water quality and associated habitat degradation as a result of run-off of pollutants to surface waters during the construction, operational and decommissioning phases of the development to undermine these conservation objective targets in the absence of mitigation.
Community extent	Maintain the extent of the Zostera-dominated community and the Mytilidae-dominated community complex, subject to natural processes.	
Community structure: Zostera density	Conserve the high quality of the Zostera-dominated community, subject to natural processes	
Community structure: Mytilus edulis density	Conserve the high quality of the Mytilidae-dominated community complex, subject to natural processes	
Community distribution	Conserve the following community types in a natural condition: Intertidal fine sand with *Peringia ulvae* and *Pygospio elegans* community complex; Estuarine mixed sediment to sandy mud with Hediste diversicolor and oligochaetes community complex; Fine sand with Angulus spp. and Nephtys spp. community complex; Sand to mixed sediment with amphipods community; Intertidal reef community.	

5.1.2.2.5 *[1140] Mudflats and sandflats not covered by seawater at low tide*

The up to date attributes and targets for this QI are provided in the table below:

Table 5-15 Targets and attributes associated with the site-specific conservation objectives for Mudflats and sandflats not covered by seawater at low tide in the Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC [000627]

Attribute	Target	Potential for Proposed Development to Undermine Conservation Objective Target in the Absence of Mitigation
Habitat area	The permanent habitat area is stable or increasing, subject to natural processes	**Yes -** On a precautionary basis, given there is hydrological connectivity between the Proposed Development and the SAC, there is potential for deterioration in water quality and associated habitat degradation as a result of run-off of pollutants to surface waters during the construction, operational
Community extent	Maintain the extent of the Zostera-dominated community and the Mytilidae-dominated community complex, subject to natural processes	

Community structure: *Zostera* density	Conserve the high quality of the Zostera-dominated community, subject to natural processes	and decommissioning phases of the development to undermine these conservation objective targets in the absence of mitigation.
Community structure: *Mytilus edulis* density	Conserve the high quality of the Mytilidae-dominated community complex, subject to natural processes	
Community distribution	Conserve the following community types in a natural condition: Intertidal fine sand with *Peringia ulvae* and *Pygospio elegans* community complex; Estuarine mixed sediment to sandy mud with *Hediste diversicolor* and oligochaetes community complex; Fine sand with crustaceans and *Scololepis* (*Scololepis*) *squamata* community complex; Fine sand with *Angulus* spp. and *Nephtys* spp. community complex	

5.2 Impact Assessment

Following the detailed review of the SSCO documents for Lough Gill SAC (Version 1, December 2021) and Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (Version 2, July 2024), no additional pathways via which adverse effects on these SACs and their QIs could occur as a result of the Proposed Development were identified. The only pathway identified for adverse effects on these SACs is via deterioration of water quality. Detailed mitigation measures for the protection of water quality, and to ensure that there will be no adverse effects on these SACs in this regard, are detailed in Sections 5.2.1.1 – 5.2.1.4 of the NIS submitted with the planning application for the Proposed Development. No additional mitigation measures to those outlined in the NIS are considered necessary for the protection of these European Sites when taking into consideration the updated SSCOs.

Section 6.4 (Residual Impact Assessment) of the NIS submitted with the planning application states,

'*In view of best scientific knowledge, on the basis of objective information, and taking into account all necessary mitigation incorporated into the proposed development, there is no potential for adverse effect on the identified QIs/SCIs and their associated targets and attributes, or on any European Site. All pathways for effect have been robustly blocked through measures to avoid impacts and the incorporation of best practice/mitigation measures into the project design'.*

The conclusions of the NIS remain valid and provided the mitigation measures outlined within the NIS are implemented in full, there is no potential for adverse effects on these SACs.

5.3 Cumulative Assessment

A review of plans and projects in the area, with a particular focus on updated plans and any projects permitted since the planning application was lodged in 2020 was undertaken. The potential for cumulative impacts on European Sites, considering the review of updated plans and projects submitted since the planning application was lodged has been fully considered in this addendum.

The Leitrim County Development Plan 2023 – 2029, the Sligo County Development Plan 2024 - 2030 and Ireland 4th National Biodiversity Action Plan 2023 – 2030 were also reviewed, with a particular focus on policies and objectives relating to European Sites.

In conclusion, no potential pathways for adverse cumulative effects on any European Site was identified.

5.4 Conclusion of the NIS

Section 8 of the NIS concluded the following:

'For the reasons set out in detail in this NIS, in the light of the best scientific knowledge in the field, all aspects of the proposed development which, by itself, or in combination with other plans or projects, which may affect the relevant European Sites have been considered. The NIS contains information which the competent authority, may consider in making its own complete, precise and definitive findings and conclusions and upon which it is capable of determining that all reasonable scientific doubt has been removed as to the effects of the proposed development on the integrity of the relevant Natura 2000 sites.

In conclusion, in the light of the conclusions of the assessment which it shall conduct on the implications for the European sites concerned, the competent authority is enabled to ascertain that the proposed development will not adversely affect the integrity of any of the European sites concerned'.

Following a review of the detailed/updated SSCOs, and taking into consideration the results of the updated ecological surveys of the site undertaken in 2025, the conclusions of the NIS submitted with the planning application for the Proposed Development remain unchanged.

6. CONCLUSION

Taking into account the results of the updated ecological surveys of the site and the updates to the Site Specific Conservation Objectives (SSCO) documents for relevant European Sites, no potential pathways for significant effects were identified on any new European sites and no potential pathways for adverse effects on any European Site were identified.

No additional pathways for effect were identified with respect to the relevant European Sites and no additional mitigation measures, further to those outlined within the NIS which accompanied the planning application, are deemed necessary to prevent adverse effects on any European Sites.

There are no changes to the findings of the AASR and NIS which accompanied the planning applications for the Proposed Development and the conclusions of these assessment documents remain valid. It can be concluded, in view of best scientific knowledge and based on objective information, that the Proposed Development will not adversely affect the integrity of any European Site

BIBLIOGRAPHY

NPWS (2021) Conservation Objectives: Lough Gill SAC 001976. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

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