# Athenry Fire Station Proposed Development

# **Ecological Impact Assessment**





# Prepared By:

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On behalf of: Galway County Council

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#### 1. INTRODUCTION

Moore Group was commissioned by the NDFA to undertake an Ecological Impact Assessment of the proposed development of proposed new Fire Station at Athenry, Co. Galway.

This report provides information on ecological features if present within the study areas, of particular significance, primarily designated habitats and species, including habitats/species listed in Annex I, II and IV of the EU Habitats Directive, rare flora listed in the Flora Protection Order along with other seminatural habitats of conservational value. Specific surveys were undertaken with regard to bats as instructed.

The report was compiled by Ger O'Donohoe M.Sc. Ger is the principal ecologist with Moore Group and has over 25 years' experience in ecological impact assessment. He graduated from GMIT in 1993 with a B.Sc. in Applied Freshwater & Marine Biology and subsequently worked in environmental consultancy while completing an M.Sc. in Environmental Sciences, graduating from Trinity College, Dublin in 1999. He has over 15 years' experience of carrying out bat surveys and has completed the Bat Conservation Ireland, Bat Detector Workshop which is the standard training for the carrying out of bat surveys in Ireland and follows the Bat Conservation Ireland 'Bat Survey Guidelines' (Aughney *et al.*, 2008). In addition, Ger is an active member of the Galway Bat Group and Bat Conservation Ireland, which monitors bat populations in Ireland, and facilitates the education of bat communities to the public.

The report has been compiled in compliance with the European Communities Legal requirements and follows EPA Draft Guidelines on Information to be contained in an EIAR (EPA, 2017) and on CIIEM and NRA Guidelines for Ecological Impact Assessment outlined in Section 2.

The European Habitats Directive 92/43/EEC (Article 6) indicates the need for plans and projects to be subject to Habitats Directive Assessment (also known as Appropriate Assessment) if the plan or project not directly connected with or necessary to the management of a Natura 2000 site (which includes SACs and SPAs) but which has the potential to have implications on a site's conservation objectives. These implications can be significant effects either individually or in combination with other plans or projects.

The Appropriate Assessment process is addressed in the Project Specific Natura Impact Statement which is presented as part of the planning application.

The site location at Carrick-on-Suir is presented in Figure 1 below.



Figure 1. Showing the location of the Proposed Development site at Athenry, Co. Galway.



Figure 2. Showing the Proposed Development site boundary on recent aerial photography.

## 2. METHODOLOGY

#### 2.1. POLICY & LEGISLATION

#### 2.1.1. EU Habitats Directive

The "Habitats Directive" (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) is the main legislative instrument for the protection and conservation of biodiversity within the European Union and lists certain habitats and species that must be protected within wildlife conservation areas, considered to be important at a European as well as at a national level. A "Special Area of Conservation" or SAC is a designation under the Habitats Directive. The Habitats Directive sets out the protocol for the protection and management of SACs.

## 2.1.2. EU Birds Directive

The "Birds Directive" (Council Directive 79/409/EEC and Council Directive 2009/147/EC on the Conservation of Wild Birds) provides for a network of sites in all member states to protect birds at their breeding, feeding, roosting and wintering areas. This directive identifies species that are rare, in danger of extinction or vulnerable to changes in habitat and which need protection (Annex I species). Appendix I indicates Annex I bird species as listed on the Birds Directive. A "Special Protection Area" or SPA, is a designation under The Birds Directive.

## 2.1.3. Wildlife Acts 1976 - 2012

The primary domestic legislation providing for the protection of wildlife in general, and the control of some activities adversely impacting upon wildlife is the Wildlife Act of 1976. The aims of the wildlife act according to the National Parks and Wildlife Service 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." All bird species are protected under the act. The Wildlife (Amendment) Act of 2000 amended the original Act to improve the effectiveness of the Act to achieve its aims.

# 2.2. SURVEY METHODOLOGY

#### 2.2.1. Desk Study

The assessment was carried out in three stages, firstly through desktop assessment to determine existing records in relation to habitats and species present in the study areas. This included research on the NPWS metadata website, the National Biodiversity Data Centre (NBDC) database and a literature review of published information on flora and fauna occurring in the development area.

Sources of information that were used to collect data on the Natura 2000 network of sites, and the environment within which they are located, are listed below:

- The following mapping and Geographical Information Systems (GIS) data sources, as required:
  - National Parks & Wildlife (NPWS) protected site boundary data;
  - Ordnance Survey of Ireland (OSI) mapping and aerial photography;
  - OSI/Environmental Protection Agency (EPA) rivers and streams, and catchments;
  - Open Street Maps;
  - Digital Elevation Model over Europe (EU-DEM);
  - Google Earth and Bing aerial photography 1995-2021;
- Online data available on Natura 2000 sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie including:
  - Natura 2000 Standard Data Form;
  - Conservation Objectives;
  - Site Synopses;
- National Biodiversity Data Centre records;
  - Online database of rare, threatened and protected species;
  - Publicly accessible biodiversity datasets.
- Status of EU Protected Habitats in Ireland. (National Parks & Wildlife Service, 2019); and
- Relevant Development Plans;
  - o Galway County Development Plan 2015 2021.

# 2.2.2. Field Study

The second phase of the assessment involved site visits to establish the existing environment in the footprint of the proposed development area. Areas which were highlighted during desktop assessment were investigated in closer detail according to the Heritage Council Best Practice Guidance for Habitat Survey and Mapping (Smith *et al.*, 2011). Habitats in the proposed development area were classified according to the Heritage Council publication "A Guide to Habitats in Ireland" (Fossitt, 2000). This publication sets out a standard scheme for identifying, describing and classifying wildlife habitats in Ireland. This form of classification uses codes to classify different habitats based on the plant species present. Species recorded in this report are given in both their Latin and English names. Latin names for plant species follow the nomenclature of "An Irish Flora" (Parnell & Curtis, 2012).

Habitats were surveyed on the 1 March 2021 by conducting a study area walkover covering the main ecological areas identified in the desktop assessment. The survey date is toward the start of the optimal botanical survey period but adequate given the improved agricultural grassland within the site. A photographic record was made of features of interest during fieldwork.

Birds were surveyed using standard transect methodology and signs were recorded where encountered during the field walkover survey.

The final part of the assessment involves an evaluation of the study area and determination of the potential impacts on the habitats of the study area. This part of the assessment forms the basis for Impact Assessment and is based on the following guidelines and publications:

- Assessment of plans and projects significantly affecting Natura 2000 sites (EC, 2002);
- Managing Natura 2000 Sites (EC, 2000 & 2018);
- Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC (EC, 2007);
- Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (DEHLG, December 2009, Rev 2010);
- EPA Draft Guidelines on Information to be contained in an EIAR (EPA, 2017);
- Best Practice Guidance for Habitat Survey and Mapping (Heritage Council, 2011);
- Ecological Surveying Techniques for Protected Flora & Fauna (NRA, 2008)
- Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA, 2009)
- Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2019).

# 2.2.3. Site Evaluation and Impact Assessment

CIEEM Guidelines for Ecological Impact Assessment (2019) and Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA, 2009) outline the methodology for evaluating ecological impacts of the project in the present report:

- Designated conservation areas and sites proposed for designation within the zone(s) of influence of any of the route options,
- All the main inland surface waters (e.g. rivers, streams, canals, lakes and reservoirs) that are
  intersected by any of the route corridor options, including their fisheries value and any
  relevant designations,
- Aquifers and dependent systems and turloughs and their subterranean water systems,
- Any known or potentially important sites for rare or protected flora or fauna that occur along
  or within the zone(s) of influence of any of the route options,
- Any other sites of ecological value, that are not designated, along or in close proximity to any
  of the route corridor options,
- Any other relevant conservation designations or programmes (e.g. catchment management schemes, habitat restoration or creation projects, community conservation projects, etc.),
- Any other features of particular ecological or conservation significance along any of the route options.

The Guidelines set out a method of evaluating the importance of sites identified and in turn the evaluation of the significance of impacts. The Evaluation Scheme is presented in Appendix 1.

#### 3. PROJECT DESCRIPTION

The Proposed Development comprises the construction of a new Fire Station at Ballygarraun South to the west of Athenry, Co. Galway.

The existing environment comprises a field of improved agricultural grassland which was one third disturbed when used as a construction compound for the adjacent link road development. .

#### 4. EXISTING ENVIRONMENT

#### 4.1. DESIGNATED CONSERVATION AREAS

Department of Environment, Heritage and Local Government (2009) Guidance on Appropriate Assessment recommends an assessment of European sites within a zone of impact of 15 km. This distance is a guidance only and the zone of impact has been identified taking consideration of the nature and location of the Proposed Development to ensure all European sites with connectivity to it are considered in terms of a catchment-based assessment.

The zone of impact may be determined by connectivity to the Proposed Development in terms of:

- Nature, scale, timing and duration of works and possible impacts, nature and size of excavations, storage of materials, flat/sloping sites;
- Distance and nature of pathways (dilution and dispersion; intervening 'buffer' lands, roads etc.); and
- Sensitivity and location of ecological features.

The guidance provides that, at the screening stage, it is necessary to identify the relevant Natura 2000 sites and compile information on their qualifying interests and conservation objectives. In preparation for this, the potential for source – pathway – receptor connectivity is firstly identified and detailed information is then provided on sites with connectivity. European sites that are located within 15 km of the Project are listed in Table 1 below, see Figure 3. Spatial boundary data on the Natura 2000 network was extracted from the NPWS website (www.npws.ie) on 11 March 2021.

Table 1 European Sites located within the potential zone of impact<sup>1</sup> of the Project.

Site Code	Site name	Distance (km) <sup>2</sup>
000242	Castletaylor Complex SAC	12.0
000268	Galway Bay Complex SAC	9.7
000297	Lough Corrib SAC	8.7
000322	Rahasane Turlough SAC	7.2
000606	Lough Fingall Complex SAC	13.2
001285	Kiltiernan Turlough SAC	13.8
002244	Ardrahan Grassland SAC	14.3
002352	Monivea Bog SAC	7.9
004089	Rahasane Turlough SPA	7.2
004142	Cregganna Marsh SPA	11.0

All European sites are located over 5km with the closest at Rahasane Turlough over 7km to the south.

There are no pathways and no connectivity to any of the European sites considered in the assessment. There are no pathways to the Clarin River and no pathways to Galway Bay.

It is possible to rule out likely significant effects on European sites as there is no potential for contamination of surface water during construction, the Proposed Development will not result in any changes to the amount of surface water run-off during operation nor will it result in any contamination of surface waters during operation and no significant increase in foul water will arise from the Proposed Development.

Having considered the above, significant effects on any European sites as a result of the Proposed Development can be ruled out and, therefore, potential significant effects on European sites can be excluded at a preliminary screening stage.

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<sup>&</sup>lt;sup>1</sup> All European sites potentially connected irrespective of the nature or scale of the Proposed Development.

<sup>&</sup>lt;sup>2</sup> Distances indicated are the closest geographical distance between the Proposed Development site and the European site boundary, as made available by the NPWS. Connectivity along hydrological pathways may be significantly greater.

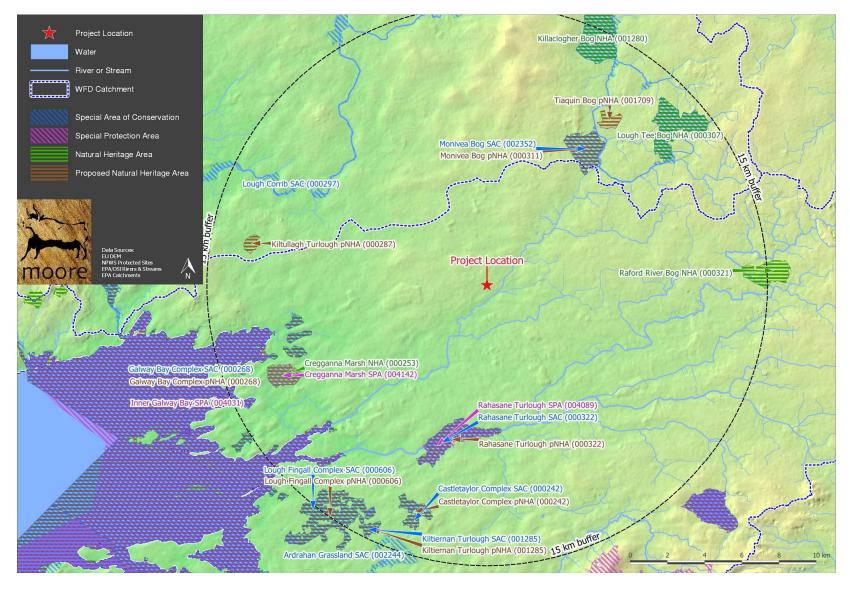


Figure 3. Showing European sites and NHAs/pNHAs within 15km of the Proposed Development.

## 4.2. HABITAT DESCRIPTIONS

The existing environment comprises a field of improved agricultural grassland which was one third disturbed when used as a construction compound for the adjacent link road development.

## 4.2.1. Habitats & Flora

The main habitat on site is Improved agricultural grassland (GA1), see habitat map in Figure 4 below.

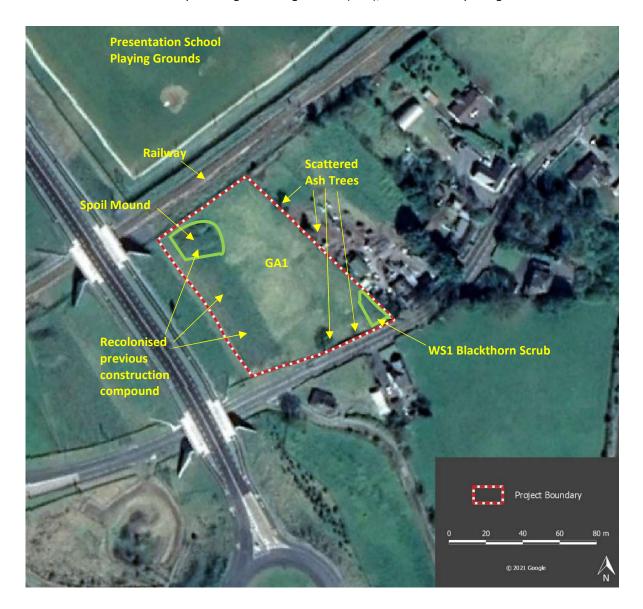


Figure 4. Detail of habitats recorded at the Proposed Development site.

The site has rank grassland with Cocksfoot (*Dactylis glomerata*) and to a lesser extent False oat-grass (*Arrhenatherum elatius*). Other species for this habitat found on site include; Meadow buttercup (*Ranunculus acris*), Nettle (*Urtica dioica*), Broad-leaved Dock (*Rumex obtusifolius*), Common sorrel (*Rumex acetosa*), Red clover (*Trifolium pratense*) and Ribwort plantain (*Plantago lanceolata*) with Cleavers (*Galium aparine*), Thistles (*Cirsium* spp.) and occasional Hogweed (*Heracleum sphondylium*).

There is a small patch of Blackthorn Scrub (WS1) developing at the south-eastern corner of the site.

Bramble (*Rubus fruticosus* agg.) scrub is frequent along with Nettle (*Urtica diocia*), Cleavers (*Galium aparine*), Ivy (Hedera helix), colonising previously disturbed areas.

There are four scattered Ash trees (*Fraxinus excelsior*) of immature to mature age located on the site boundaries.

There are no Annexed Habitats or Species present within the boundary of the Proposed Development site.

#### **Invasive Species**

There were no sign of invasive species recorded at he proposed development site.

## 4.1. FAUNA

#### 4.1.1. Mammals

#### **Badgers**

There were no signs of badgers or badger movement within or adjacent to the Proposed Development site.

# <u>Bats</u>

The NBDC database was consulted for details on bat records held for the site and the surroundings. The database was consulted on the 11/03/2021 for details on historical records from a specific polygon enclosing the site. There are no records of bat species from this site specific polygon.

The value of the site for bat roosting is low given the open nature of the site, the operational railway to the north and the adjacent recently completed link road.

The Ash trees on site were examined for bat roost potential and deemed to have no potential given the age of the trees and lack of roosting cavities.

# 4.1.2. Birds

A list of bird species recorded during fieldwork in 2021 is presented in Table 2 below. There were no rare or Annex 1 bird species recorded on the site.

Table 2 Birds recorded during fieldwork in March 2021.

Birds	Scientific name	BWI	Habitat Type
		Status	
Woodpigeon	Columba palumbus	Green	Dense woodland to open moorland, common in gardens
Blackbird	Turdus merula	Green	Dense woodland to open moorland, common in gardens
Magpie	Pica pica	Green	Dense woodland to open moorland, common in gardens
Chaffinch	Fringilla coelebs	Green	Hedgerows, gardens and farmland

#### 5. SITE EVALUATION

The ecological value of the site was assessed following the guidelines set out in the Institute of Ecology and Environmental Management's Guidelines for Ecological Impact Assessment (2019) and according to the Natura Scheme for evaluating ecological sites (after Nairn & Fossitt, 2004). Judgements on the evaluation were made using geographic frames of reference, e.g. European, National, Regional or Local.

Due cognisance of features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive were considered in this assessment.

There are no rare or protected habitats recorded in the study area. The development area is generally of relatively Low Local Ecological Value.

There are no Annexed within or adjacent to the proposed development site. There are no rare or protected habitats recorded within the study area.

The general habitats under the footprint of the proposed development are of low local ecological value.

# 5.1. ASSESSMENT OF EFFECTS

#### **5.1.1.** Direct Effects

# **Habitats**

All European sites are located over 5km with the closest at Rahasane Turlough over 7km to the south.

There are no pathways and no connectivity to any of the European sites considered in the assessment. There are no pathways to the Clarin River and no pathways to Galway Bay.

It is possible to rule out likely significant effects on European sites as there is no potential for contamination of surface water during construction, the Proposed Development will not result in any changes to the amount of surface water run-off during operation nor will it result in any contamination

of surface waters during operation and no significant increase in foul water will arise from the Proposed Development.

Having considered the above, significant effects on any European sites as a result of the Proposed Development can be ruled out and, therefore, potential significant effects on European sites can be excluded at a preliminary screening stage.

There will be a loss of previously managed grassland that has become overgrown. The potential effects on habitats are *neutral* and *imperceptible*.

## <u>Fauna</u>

There will be no direct impacts on mammals or mammal habitats.

There are no predicted direct effects on Bats as a result of the proposed development.

There are no predicted direct effects on Birds as a result of the proposed development.

#### 5.1.2. Indirect Effects

There are no predicted indirect effects on habitats. There is no connectivity to the Clarin River or to Galway Bay.

There will be no indirect impacts on mammals or mammal habitats.

There are no predicted indirect effects on Birds as a result of the proposed development.

# 5.1.3. Cumulative Effects

In-combination or cumulative effects are changes in the environment that result from numerous human-induced, small-scale alterations. Cumulative impacts can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

As part of the Assessment, in addition to the Proposed Development, other relevant plans and projects in the area must also be considered at this stage. This step aims to identify at this early stage any possible significant in-combination effects of the proposed development with other such plans and projects on European sites.

A review of the National Planning Application Database was undertaken. The first stage of this review confirmed that there were no data outages in the area where the Proposed Development is located. The database was then queried for developments granted planning permission within 500m of the Proposed Development site within the last three years. These are presented in Table 3 below.

Table 3 Planning applications granted permission in the vicinity of the Proposed Development.

Planning Ref.	Description of development	Comments
171875	for development consisting of a new 2 storey 11,386sqm Post-Primary School, including a 2-classroom Special Needs Unit, incorporating Sports Hall; Classrooms; General Purpose Hall and all ancillary pupil and staff facilities; with all associated site works; a new sub-station; 92 number car parking spaces; ballcourts; hard and soft play areas and landscaping: including a new pedestrian/cycle path along the R348 and modifications to existing vehicular bridge into the site. Gross floor space of proposed works 11,386sqm.	This Project is complete and there is no potential for in-combination effects.
1877	to demolish the existing roofed sheep penning/sales shed and re-erect a new sheep penning/sales shed on the footprint of the existing sheep penning/sales shed. Gross floor space of proposed works 2231 sqm.	No potential for in-combination effects given the small scale and location of the project.
18355	for development comprising the decommissioning of the existing, private on-site waste water treatment system to include remedial site works and a proposed connection to the public waste water treatment system to facilitate construction of 19 no. two storey 3 bed residential dwellings and 9 no. 2 storey 2 bed residential dwellings and provision of car parking, open space, landscaping and associated site works. Gross floor space of proposed works 2906 sqm.	A Report for AA Screening submitted by the Landscape Architects was considered deficient in terms the consideration of in-combination effects. Departmental Guidance requires that AA assessment is prepared by an Ecologist.  A revised report was prepared and accepted by GCC in consideration of the grant of permission.
181101	to extend existing cattle sales Ring Number 3 building. The proposed extension will be used for retail use. It also seeks planning permission for a change of use of existing sales Ring 3 from cattle sales to retail use. Gross floor space of proposed works 118.5 sqm. Gross floor space of work to be retained 174.2 sqm.	Significant impacts on Natura 2000 sites were ruled out.
19581	completion of a dwelling house, previously permitted under Ref 16/164 at 5 Ballygarraun South. Gross floor space of work to be retained: 174 sqm	Significant impacts on Natura 2000 sites were ruled out.

The listed developments have been granted permission in most cases with conditions relating to sustainable development by the consenting authority in compliance with the relevant Local Authority Development Plan and in compliance with the Local Authority requirement for regard to the Habitats Directive. The development cannot have received planning permission without having met the consenting authority requirement in this regard. There are no predicted in-combination effects given that it is predicted that the Proposed Development will have no effect on biodiversity. In this way, incombination impacts with Plans or Projects for the development area and surrounding area in which the development site is located, would be avoided.

## 6. **CONCLUSIONS & RECOMMENDATIONS**

The main area of construction work and loss of habitat refers to the rank grassland of the overall site which is of relatively low ecological value and not considered a significant loss.

The development is located in an area of low ecological value and as such predicted to have a *neutral imperceptible* effect on habitats, mammals and birds.

#### 7. REFERENCES

CIEEM (2019) Guidelines for Ecological Impact Assessment in the UK And Ireland Terrestrial, Freshwater, Coastal and Marine September 2018 Version 1.1 - Updated September 2019.

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# Appendix 1

# **TII Evaluation of Habitats**

Ecological valuation: Examples			
International Importance:			
	'European Site' including Special Area of Conservation (SAC), Site of Community Importance (SCI), Special Protection Area (SPA) or proposed Special Area of Conservation.		
	Proposed Special Protection Area (pSPA).		
	Site that fulfills the criteria for designation as a 'European Site' (see Annex III of the Habitats Directive, as amended).		
	Features essential to maintaining the coherence of the Natura 2000 Network. <sup>4</sup>		
	Site containing 'best examples' of the habitat types listed in Annex I of the Habitats Directive.		
	Resident or regularly occurring populations (assessed to be important at the national level) <sup>5</sup> of the following:		
	Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; and/or		
	☐ Species of animal and plants listed in Annex II and/or IV of the Habitats Directive.		
	Ramsar Site (Convention on Wetlands of International Importance Especially Waterfowl Habitat 1971).		
	World Heritage Site (Convention for the Protection of World Cultural & Natural Heritage, 1972).		
	Biosphere Reserve (UNESCO Man & The Biosphere Programme).		
	Site hosting significant species populations under the Bonn Convention (Convention on the Conservation of Migratory Species of Wild Animals, 1979).		
	Site hosting significant populations under the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats, 1979).		
	Biogenetic Reserve under the Council of Europe.		
	European Diploma Site under the Council of Europe.		
	Salmonid water designated pursuant to the European Communities (Quality of Salmonid Waters) Regulations, 1988, (S.I. No. 293 of 1988). <sup>6</sup>		
Nation	al Importance:		
	Site designated or proposed as a Natural Heritage Area (NHA).		
	Statutory Nature Reserve.		
	Refuge for Fauna and Flora protected under the Wildlife Acts.		
	National Park.		
	Undesignated site fulfilling the criteria for designation as a Natural Heritage Area (NHA); Statutory Nature Reserve; Refuge for Fauna and Flora protected under the Wildlife Act; and/or a National Park.		
	Resident or regularly occurring populations (assessed to be important at the national level) <sup>7</sup> of the following:		
	☐ Species protected under the Wildlife Acts; and/or		
	☐ Species listed on the relevant Red Data list.		
	Site containing 'viable areas' of the habitat types listed in Annex I of the Habitats Directive.		

Count	y Importance:
	Area of Special Amenity.9
	Area subject to a Tree Preservation Order.
	Area of High Amenity, or equivalent, designated under the County Development Plan.
	Resident or regularly occurring populations (assessed to be important at the County level) $^{10}$ of the following:
	☐ Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive;
	☐ Species of animal and plants listed in Annex II and/or IV of the Habitats Directive;
	☐ Species protected under the Wildlife Acts; and/or
	☐ Species listed on the relevant Red Data list.
	Site containing area or areas of the habitat types listed in Annex I of the Habitats Directive that do not fulfil the criteria for valuation as of International or National importance.
	County important populations of species, or viable areas of semi-natural habitats or natural heritage features identified in the National or Local BAP,11 if this has been prepared.
	Sites containing semi-natural habitat types with high biodiversity in a county context and a high degree of naturalness, or populations of species that are uncommon within the county.
	Sites containing habitats and species that are rare or are undergoing a decline in quality or extent at a national level.
Local	Importance (higher value):
	Locally important populations of priority species or habitats or natural heritage features identified in the Local BAP, if this has been prepared;
0	Resident or regularly occurring populations (assessed to be important at the Local level) $^{12}$ of the following:
	☐ Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive;
	☐ Species of animal and plants listed in Annex II and/or IV of the Habitats Directive;
	☐ Species protected under the Wildlife Acts; and/or
	☐ Species listed on the relevant Red Data list.
	Sites containing semi-natural habitat types with high biodiversity in a local context and a high degree of naturalness, or populations of species that are uncommon in the locality;
	Sites or features containing common or lower value habitats, including naturalised species that are nevertheless essential in maintaining links and ecological corridors between features of higher ecological value.
Local	Importance (lower value):
	Sites containing small areas of semi-natural habitat that are of some local importance for wildlife;
	Sites or features containing non-native species that are of some importance in maintaining habitat links.

# **Appendix 2 Site Photos**



**Photo 1.** Showing the site with recolonised ground in the foreground and improved grassland in the background.



**Photo 2.** Detail of the mature Ash to the front of the site with low bat roosting potential.