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HABITATS DIRECTIVE APPROPRIATE ASSESSMENT SCREENING (STAGE 1):

IN RELATION TO:
DRUMSHANBO TOWN CENTRE REGENERATION PROJECT

Client: Leitrim County Council,
c/o McCabe Architects
Ardeskin,
Old Laghey Road,
Donegal Town,
Co. Donegal.

Site Location: Main Street,
Drumshanbo,
Co. Leitrim.

Prepared By: Mr. Freddie P.R. Symmons B.Env.Sc (HONS) MCIEEM
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Report Ref: AA Screening-Drumshanbo-LeitrimCoCo-30.11.2023

Report Date: 30th November 2023

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1. Introduction

1.1 Preamble

Mr. Freddie Symmons - B.Env. Sc. (HONS) M.C.I.E.E.M *Senior Environmental Consultant* and *Ecologist* of Kingfisher Environmental Consultants and a *Full Member of the Chartered Institute of Ecology and Environmental Management* has been engaged by McCabe Architects on behalf of Leitrim County Council to carry out and prepare a Stage 1 Appropriate Assessment Screening Report in relation to:

"Drumshanbo Town Centre Regeneration Project".

This AA Screening Report has been prepared to address Section 4.1.7: Appropriate Assessment as set out in the *Design Brief For Procurement of Architect Led Project Management Design Team Services for the Provision of a 4-Strand Rural Regeneration Intervention for Drumshanbo (overarching title Drumshanbo ExCHANGE) at Drumshanbo, Co. Leitrim, Document ID: 01-DB, March 2022.*

With the introduction of the Birds Directive in 1979 and the Habitats Directive in 1992 came the obligation to establish the Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's).

Appropriate Assessment (AA) involves a case-by-case examination of the implications of a development for the Natura 2000 site and its conservation objectives. This may be presented in the form of a Natura Impact Statement. In general terms, implicit in Article 6(3) of the Habitats Directive is an obligation to put concern for potential effects on Natura 2000 sites at the forefront of every decision made in relation to plans and projects at all stages.

Each step in the assessment process precedes and provides a basis for other steps. The results at each step must be documented and recorded carefully so there is full traceability and transparency of the decisions made. They also determine the decisions that ultimately may be made in relation to approval or refusal of a plan or project. AA is not a prohibition on new development or activities but involves a case-by-case examination of the implications for the Natura 2000 site and its conservation objectives.

In the preparation of this report, careful attention has been made to fully document and reference all the site selection and suitability assessment procedures as they chronologically occurred. This is in accordance with the principles of Appropriate Assessment.

This report takes cognisance of the Kelly v An Bord Pleanala Case 2014 IEHC 400 which determined that conclusions must be capable of removing all reasonable scientific doubt as to whether a development may have significant effects on Natura 2000 sites.

1.2 Statement of Authority

This report has been prepared by an experienced Senior Environmental Consultant and Ecologist with over **28 years** professional experience going back as far as 1993. The author is a *Full Member of the Chartered Institute of Ecology and Environmental Management* and has prepared in excess of 100 Appropriate Assessment Screening and NIS reports in Ireland and in excess of 50 EIS and EIAR Reports.

This report takes cognisance of the Kelly v An Bord Pleanala Case 2014 IEHC 400 which determined that conclusions must be capable of removing all reasonable scientific doubt as to whether a development may have significant effects on Natura 2000 sites.

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1.3 Methodology for Appropriate Assessment

1.3.1 Stage One - Screening for Appropriate Assessment

The Habitats Directive does not set out clear guidance on the exact format that a screening exercise for an appropriate assessment should follow. However, there is guidance provided in carrying out a Screening Report.

- Environment Heritage and Local Government: *Circular L8/08 Water Services Investment and Rural Water: Protection of Natural Heritage and National Monuments Programmes*. This is outlined on pages 30 – 35 of the Environment Heritage and Local Government publication: *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities*, Published 10 December 2009.
- Environmental Protection Agency (n.d.) *Waste Water Discharge Licensing - Appropriate Assessment - Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007)* Wexford, EPA.
- Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021

In the first document, screening for appropriate assessment involves the following:

Description of Plan or Project
The first element is a description of the plan or project, including its nature, size and location, and possible or likely effects, and draft policies, objectives, land use zonings and associated strategies in the case of plans.

Natura 2000 Sites
The second element is an examination of what Natura 2000 sites may be affected.

The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km) – (Source: *Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021*).

The identification of European sites within a 15km zone has become common practice in screening projects for AA. However, this approach is not based on the S-P-R model and should not be used for projects. Few projects have a zone of influence this large, but some more complex projects may require a greater zone of investigation. Instead the zone of influence of a project should be considered using the Source-Pathway-Receptor model. This should avoid lengthy descriptions of European sites, regardless of whether they are relevant to the proposed development, and a lack of focus on the relevant European sites and issues of importance.

Site synopses, which are summary descriptions of the key conservation interests of sites, and SAC datasheets with lists of qualifying interests for these sites are available from the NPWS website: www.npws.ie.

Assessment of Likely Effects
The task of establishing whether the plan or project is likely to have an effect on a Natura 2000 site or sites is based on a preliminary impact assessment using available information and data, including that outlined above, and other available environmental information (e.g. water quality data), supplemented as necessary by local site information and ecological surveys. This is followed by a determination of whether there is a risk that the effects identified could be significant. This need not be a lengthy exercise. A precautionary approach

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is fundamental and, in cases of uncertainty, it should be assumed the effects could be significant. Examples of significance indicators from Commission guidance (EC, 2002) are listed in the table below; this document also summarises four case study examples of assessment of significance outcomes for projects. As a guide, any element of a plan or project that has the potential to affect the conservation objectives of a Natura 2000 site, including its structure and function, should be considered significant (EC, 2006).

Impact type	Significance indicator
Loss of habitat area	Percentage of loss
Fragmentation	Duration or permanence, level in relation to original extent
Disturbance	Duration or permanence, distance from site
Species population density	Timescale for replacement
Water resource	Relative change
Water quality	Relative change in key indicative chemicals and other elements

Examples of significance indicators (from EC (2002), Box 4)

Some examples of effects that are likely to be significant are:

- Any impact on an Annex I habitat
- Causing reduction in the area of the habitat or Natura 2000 site
- Causing direct or indirect damage to the physical quality of the environment (e.g. water quality and supply, soil compaction) in the Natura 2000 site
- Causing serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination and human activity)
- Causing direct or indirect damage to the size, characteristics or reproductive ability of populations on the Natura 2000 site
- Interfering with mitigation measures put in place for other plans or projects

As the underlying intention of the in-combination provision is to take account of cumulative effects, and as these effects often only occur over time, plans or projects that are completed, approved but uncompleted, or proposed (but not yet approved) should be considered in this context (EC, 2002). All likely sources of effects arising from the plan or project under consideration should be considered together with other sources of effects in the existing environment and any other effects likely to arise from proposed or permitted plans or projects.

Screening Conclusion and Statement

The findings and conclusions of the screening process should be documented, with the necessary supporting evidence and objective criteria. This is of particular importance in cases where the AA process ends at the screening stage because the conclusion is that no significant effects are likely. Screening can result in the following possible conclusions or outcomes:

1. AA is not required. Screening, followed by consultation and agreement with the NPWS, establishes that the plan or project is directly connected with or necessary to the nature conservation management of the site.

2. No potential for significant effects/AA is not required. Screening establishes that there is no potential for significant effects and the project or plan can proceed as proposed. However, no changes may be made after this as this will invalidate the findings of screening. Documentation of the AA screening process, including conclusions reached and how decisions were made, must be kept on file**.**

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3. Significant effects are certain, likely or uncertain. The plan or project **must either proceed to Stage 2 (AA), or be rejected**. Rejection of a plan or project that is too potentially damaging and/or inappropriate ends the process and negates any need to proceed to Stage 2 (AA). Another possible option is to recommence the screening process with a modified plan or project that removes or avoids elements that posed obvious risks. This highlights the important process of screening a plan or project when new alternatives that may not have any impact are being considered. However, repeated or complicated screening exercises are not recommended as they point to the risk of significant effects and the need for Stage 2 (AA). The safeguards set out in Article 6(3) and (4) of the Habitats Directive are triggered not by certainty but by the possibility of significant effects. Thus, in line with the precautionary principle, it is unacceptable to fail to undertake an appropriate assessment on the basis that it is not certain that there are significant effects.

The following document has been used as guidance in compiling this screening report:

- Environmental Protection Agency (n.d.) *Waste Water Discharge Licensing - Appropriate Assessment - Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007)* Wexford, EPA.

In this document, screening for appropriate assessment involves the following:

Step 1: Management of the site
Is the project directly connected with or necessary to the management of the site?

Step 2: Description of the project or plan
Identify all the elements of the project or plan alone or in combination with other plans or projects that have the potential for having significant effects on the site. The geographical scope of the plan or project as well as the European Sites that may be affected must be identified. The European Site or Sites that could be affected should be described.

A project may not in itself have a significant effect on a European Site, however, in combination with other plans or projects (existing and planned) it may result in a significant effect on a European Site.

Step 3: Characteristics of the site
This step requires identification of the impacts of the project on a European Site by characterising the site as a whole or those areas where impacts are most likely to occur. In addition to consideration of the cumulative effects on a European Site, consideration must also be given to direct, indirect, short and long-term, isolated and interactive effects.

Step 4: Assessment of significance
The assessment of the likelihood of significant effects of a proposed or existing plan or project on a European Site should be completed. If no significant effects are likely then no further assessment is required prior to the authorisation of the plan or project. There must be no reasonable scientific doubt that the plan or project does not have an effect on a European Site. This decision should be reasoned and recorded. If significant effects are likely then an appropriate assessment must be carried out. In addition, if the likelihood of significant effects is in doubt then the *precautionary principle* applies and an appropriate assessment must be carried out.

1.3.2 Stage Two: Appropriate Assessment

This is the consideration of the impact of the project or plan on the integrity of the Natura 2000 site, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. The competent Authority drafts the AA.

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1.3.3 Stage Three: Assessment of Alternative Solutions

This is the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

1.3.4 Stage Four: Imperative Reasons of Overriding Public Interest (IROPI)

Stage 4 of Appropriate Assessment is the main derogation process of Article 6(4) of the Habitats Directive which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project that will have adverse effects on the integrity of a Natura 2000 site to proceed in cases where it has been established that no less damaging alternative solution exists. This stage requires an affirmative answer to both of the questions below in order for a plan or project to go ahead in the absence of alternative solutions.

- Are there imperative reasons of overriding public interest?
- Are there human health or safety considerations or important environmental benefits?

1.3.5. References

The following references and source material have been referred to our used in the preparation of this screening assessment:

- Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2001)
- Birds Directive (79/409EEC)
- Environment Heritage and Local Government (10 December 2009) Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities, Dublin.
- Environment Heritage and Local Government (March 11 2010) Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: guidance for Planning Authorities, Dublin.
- Environment Heritage and Local Government: Circular L8/08 Water Services Investment and Rural Water: Protection of Natural Heritage and National Monuments Programmes
- Environmental Protection Agency (n.d.) Waste Water Discharge Licensing - Appropriate Assessment - Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007) Wexford, EPA.
- Environmental Protection Agency (2000) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Wexford, EPA.
- European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94 of 1997) (which has been amended twice, S.I. No. 233 of 1998 & S.I. No. 378 of 2005).
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the concepts of: Alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the Commission (2007)
- The European Commission published guidance on Article 6 of the Habitats Directive, including on Appropriate Assessment Screening. Assessment of plans and projects significantly affecting Natura 2000 sites (November 2001) and Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive (2018).
- Habitats Directive (92/43/EEC)
- National Parks and Wildlife Service Website – www.npws.ie: Site Synopsis and Mapping Data for Natura 2000 Sites.
- Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007)
- High Court: Uí Mhuirnín v. MHPLG [2019] IEHC 824
- Sweetman v ABP [2020] IEHC 39
- Kelly v. An Bord Pleanála (Aldi Stores) [2019] IEHC 84

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- Heather Hill Management v. An Bord Pleanála and Burkeway Homes [2019] IEHC 186 and 450 Court of Justice of the European Union (CJEU):
- C-258/11 - Sweetman and Others v ABP (Galway Bypass)
- C-258/11 - AG opinion, Sweetman and Others v ABP (Galway Bypass)
- C-127/02 - Waddenzee
- C-521/12 - T.C. Briels and Others v Minister van Infrastructuur en Milieu
- C-323/17 - People Over Wind and Sweetman v. Coilte Teoranta
- Managing Natura 2000 Sites – The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (updated 2018)
- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)
- Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021

2. SCREENING FOR APPROPRIATE ASSESSMENT

2.1 Introduction

Screening for Appropriate Assessment is the first stage and critical test of Appropriate Assessment and the question is asked whether the development is considered to have a significant impact on a designated Natura 2000 site. The purpose of screening is to determine, on the basis of a preliminary assessment and objective criteria, whether:

i) a plan or project is directly connected to or necessary for the management of the site, and
ii) whether a plan or project, alone and in combination with other plans or projects, could have significant effects on a Natura 2000 site in view of the site's conservation objectives.

As most projects will not be related to point (i) above, this will virtually always be irrelevant but with regards to point (ii) if the answer is no then the process is complete and full appropriate assessment is not required. Screening therefore is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3) of the Habitats Directive.

Screening **should be undertaken without the inclusion of mitigation**, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. This report takes cognisance of the Kelly v An Bord Pleanala Case 2014 IEHC 400 which determined that conclusions must be capable of removing all reasonable scientific doubt as to the effects on Natura 2000 sites.

2.2 Screening Process

2.2.1 Step 1: Management of the site

Question: Is the plan or project directly connected with or necessary to the management of the Natura 2000 site?

Answer: **No**

2.2.2 Step 2: Description of the project or plan

The development will consist of the*" **Drumshanbo Town Centre Regeneration Project**".*

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The Drumshanbo Town Centre Regeneration Project will include the following works:

1. The redevelopment of two vacant buildings on Main Street, namely the former Bank of Ireland, a three-storey building, and the adjacent commercial building formerly known as 'Earley's', a three-storey building. Development works will include the demolition of the rear extensions to the respective buildings and the erection of a linear two- storey extension to the south side linking both buildings to provide commercial use to the entire ground floor and new smart working facility to the entire first and second floors. Works will include the creation of a new pedestrian walkway on the ground floor through 'Earley's' building to link a new public realm to the rear. All services will connect to existing public mains.

2. The creation of a public realm and additional parking to the rear of the renovated and extended commercial buildings on Main Street. The nature of the public realm works includes, inter alia, the opening of vehicular and pedestrian access routes through the existing stone boundary wall between the existing Market Street carpark and the former Bank of Ireland Building, lowering the height of the entire wall to 1m high, realignment works to the existing Market Street Carpark, the provision of new public lighting, a dedicated pedestrianized public realm that will incorporate seating, the provision of hard and soft landscaping, ramp access between Main Street and the redeveloped riverside walkway and a car park for seven car parking spaces

3. The redevelopment and partial reconstruction of two derelict outbuildings to the east of the Drumshanbo River. Both two-storey buildings will be redeveloped and repurposed to provide commercial use on both ground and first floors respectively, which will entail elevational changes and connections to existing foul and storm mains.

4. Riverside and town park improvement works to enhance the existing parklands and riverside walkway (known locally as 'People's Park'). The nature of the riverside and town park works includes inter-alia, the extension of the pedestrian walkway along the west of the river under the existing park footbridge to connect with a new footbridge 30m to the south which will in turn connect with the new public realm (to the rear of Main Street), an extension of the pedestrian walkway along the eastern side of the river to connect through the curtilage of Drumshanbo Methodist Church, a protected structure on the Leitrim County Council Record of Protected Structures (RPS No.14) to connect via a new pedestrian bridge with the junction of the Carrick Road and the Food Hub/Carraig Breac housing development road. Works will also include the altering of the existing hard landscaping area at the entrance to the Food Hub/Carrig Breac housing development, provision of new footpath along Carraig Breac housing development to include new entrance to the People's Park, new steps and ramp access within the park, the erection of new way finding signs, the provision of new public lighting, new hard and soft landscaping, new boundary treatments inclusive of railings, hedgerows and walls.

The site in question is 0.794 Hectares (c. 1.962 Acres) in size and is located along the Main Street in Drumshanbo, Co. Leitrim, see **Figure 2.2.2.1, Figure 2.2.2.2 and Figure 2.2.2.3**.

The Drumshanbo River flows through the urban site in a northerly direction before flowing west to north-west before joining with Lough Allen.

The existing site layout plan is shown as **Figure 2.2.2.4** and the proposed site layout plan is shown as **Figure 2.2.2.5.** A separate landscaping plan is submitted with the planning application.

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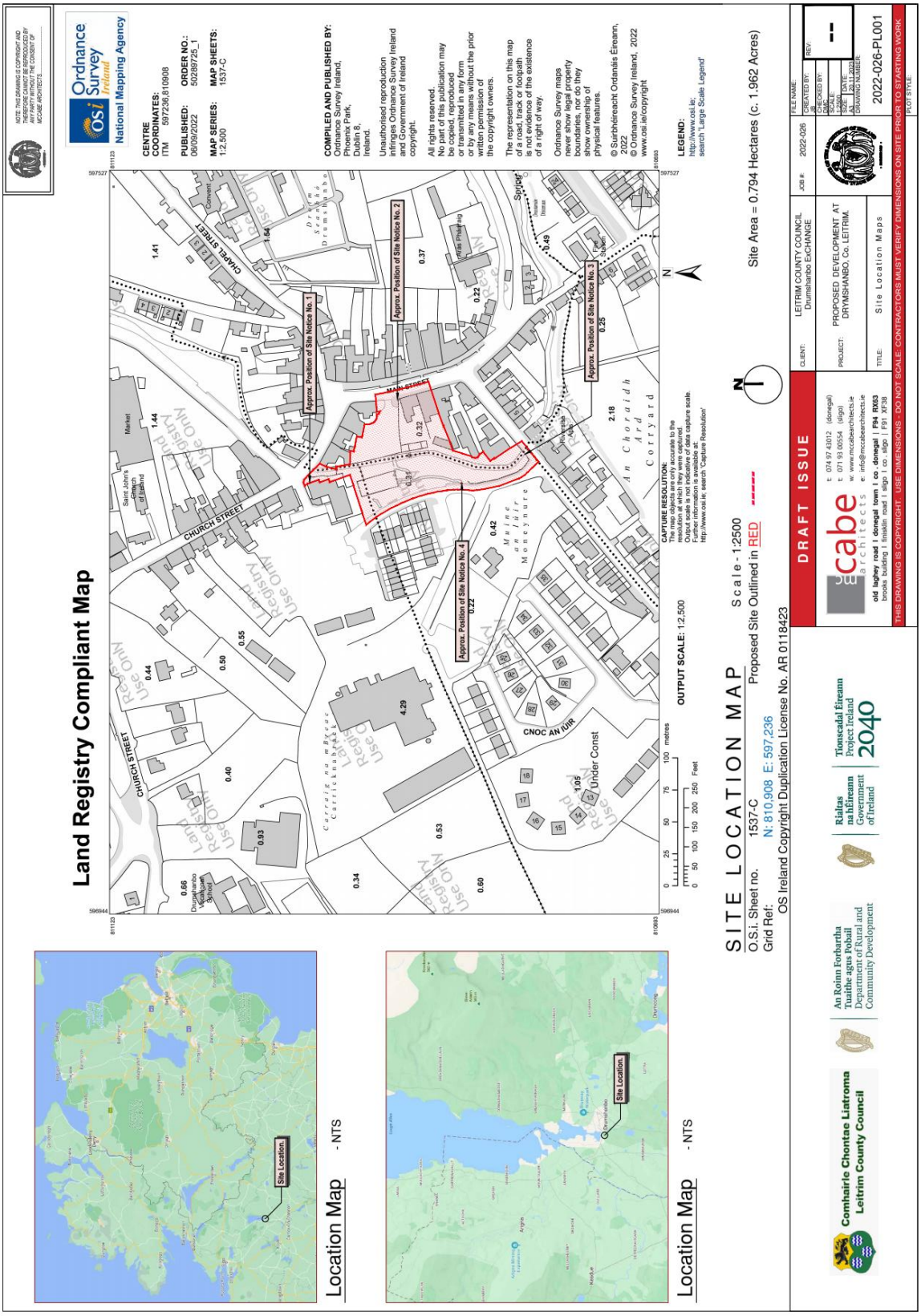

Figure 2.2.2.1: Site Location Map (Source: McCabe Architects)

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Figure 2.2.2.2: Regional Site Location Map (Source: NPWS Public Map Viewer)

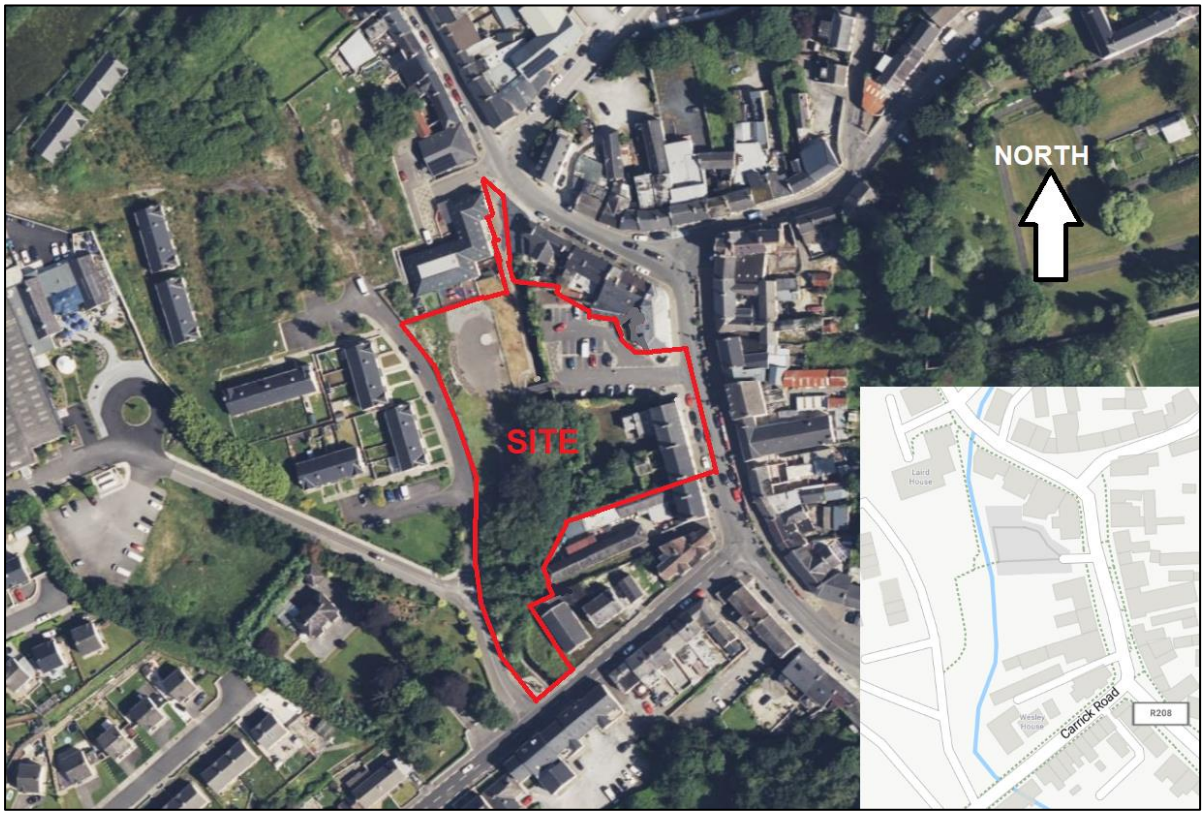

Figure 2.2.2.2: Existing Aerial Site Photo (Source: Bing Maps)

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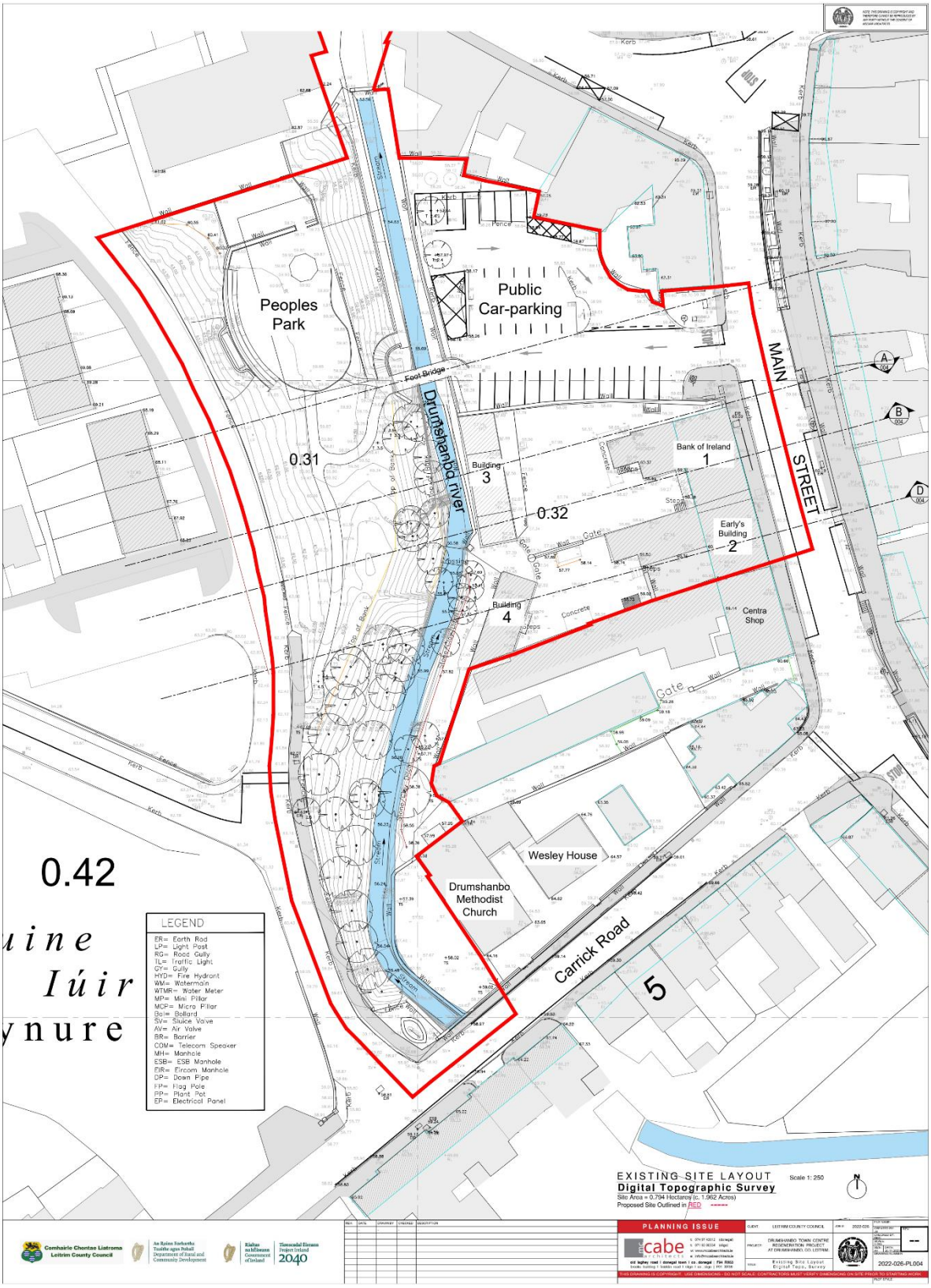

Figure 2.2.2.4: Existing Site Layout Plan (Source: McCabe Architects)

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Figure 2.2.2.5: Proposed Site Layout Plan (Source: McCabe Architects)

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2.2.2.1 Site Habitat Survey/Biodiversity Statement

The ecology of the Drumshanbo Town Centre Regeneration Project has been described in accordance with *Fossit, J.A., 2000. A Guide to Habitats in Ireland, The Heritage Council, Kilkenny.* A separate Arborist's Tree report is submitted with the planning application.

In addition, the following references have been used in the preparation of this habitat description:

- Devlin, Z. 2014. The Wildflowers of Ireland – A Field Guide: The Collins Press, Cork.
- Harrap, S, 2013. Harrap's Wild Flowers – A Field Guide to Wild Flowers of Britain & Ireland. Bloomsbury, London.
- Hubbard, C. E. 1992. Grasses: A Guide to their Structure, Identification, Uses and Distribution in the British Isles.
- Jermy, A. C., Chater, A. O. & R. W. David. 1982. Sedges of the British Isles: BSBI Handbook No. 1. BSBI, London.
- Joyce, P. M. 1998. Growing Broadleaves – Silvicultural Guidelines for Ash, Sycamore, Wild Cherry, Beech & Oak in Ireland. Coford, Dublin. Smith, A. J.E. 1978. The Moss Flora of Britain & Ireland. Cambridge University Press, Cambridge.
- Stace, C. A. 1991. New Flora of the British Isles.
- Streeter, D. 2016. Collins Wild Flower Guide 2nd Edition – The Most Complete Guide to the Wild Flowers of Britain and Ireland. William Collins, London.
- Webb, D. A. Parnell J. & D. Doogue. 1996. An Irish Flora. Dundalgan Press Ltd., Dundalk.
- www.wildflowersireland.ie

As the site is an existing urban developed site with existing buildings, walls, roads and hard surfaces, the majoprity of the site comes within the habitat classification of:

- Buildings and artificial surfaces BL3.

The site boundaries typically consist of linear habitats consisting of:

- Habitat type BL1 – Stone Walls
- Habitat WL1 Hedgerows
- WL2 Treelines
- Habitat Type - Buildings and artificial surfaces BL3. These are the boundary roads and footpaths.

Many of the stone walls and buildings are somewhat neglected with widespread growth of Ivy, Buddleia and spreading Sycamore trees.

The grounds around the buildings typically consist of overgrown gardens and scrub which fall within:

- Habitat ED3 – Recolonising Bare Ground
- Habitat GS2 – Dry Meadows and Grassy Verges
- Habitat WS1 – Scrub
- Habitat GA2A - Amenity Grassland (improved)
- Habitat WN5 – Riparian Woodland.

Over time, the rear gardens and hardstanding areas have been partially recolonised by ruderals to become Habitat ED3 – Recolonising Bare Ground. This habitat category is used for any areas where bare or disturbed ground, derelict sites or artificial surfaces of tarmac, concrete or hard core have been invaded by herbaceous plants.

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The People's Park and river walk consists of:

- Habitat GA2A - Amenity Grassland (improved)
- Habitat WN5 – Riparian Woodland
- Habitat BL3 - Buildings and artificial surfaces BL3
- Habitat ED3 – Recolonising Bare Ground
- Habitat Type BC4 - Ornamental flower beds and borders.

Where the site is to be built upon as part of the site development proposals, it will change from any of the above to Habitat BL3 - Buildings and artificial surfaces.

As there are proposals for landscaping as part of the Regeneration Project, the rear gardens and the People's Park will have soft landscaping, new boundary treatments inclusive of railings, hedgerows and walls these areas will likely become mown lawns and gardens which are classified as Habitat GA2A - Amenity Grassland (improved). This type of grassland is improved and is managed for purposes other than grass production. In addition, there is likely to be more of Habitat Type BC4 - Ornamental flower beds and borders.

The Drumshanbo River which is considered Habitat Type FW2 – Lowland Rivers - flows through the urban site in a northerly direction before flowing west to north-west before joining with Lough Allen. This River is highly channelised with adjoining stone walls (Habitat type BL1 – Stone Walls) and passes under culverts and bridges through the site and town. This River is adjoined by Habitat WN5 – Riparian Woodland (mainly Sycamore, Ash, Beech, Silver Birch, Alder and occasional Conifers) and Buildings and artificial surfaces BL3 which are the existing footpaths, steps and hardstanding areas. Most of the mature or maturing trees growing on these lands are less than about seventy years old. It seems that the beech, larch and spruce were planted at about this time.

Most of the ash, sycamore, birch and willows appear younger and have probably grown from naturally dispersed seeds within the past thirty years or so. There has also been some additional tree planting along the roadside that was established about ten or fifteen years ago. Many of the ash are now infected with ash dieback (*Hymenoscyphus fraxineus*). These trees, and a dead stump should be felled to ensure site safety. There is also a need to remove saplings that are growing within existing buildings, and to clear back canopies that are blocking roads and paths; or are overtopping buildings. The habitats of the site are shown in the following Photographs:

Photo 1: View of the Two Main Buildings to be Refurbished on Main Street. Habitat Type BL3 - Buildings and artificial surfaces

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Photos 2-5: Showing Habitat ED3 – Recolonising Bare Ground; Habitat WS1 – Scrub Habitat WN5 – Riparian Woodland and Habitat BL3 - Buildings and artificial surfaces

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Photos 6-8: Showing the Drumshanbo River flowing through the site (Habitat Type FW2 – Lowland Rivers). This River is highly channelised with adjoining stone walls (Habitat BL1 – Stone Walls) and Habitat WN5 – Riparian Woodland (mainly Sycamore, Ash, Beech, Silver Birch, Alder and occasional Conifers)

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Photos 9-10: Showing the **People's Park which consists of Habitat GA2A - Amenity Grassland (improved); Habitat BL3 - Buildings and artificial surfaces BL3; Habitat ED3 – Recolonising Bare Ground and Habitat Type BC4 - Ornamental flower beds and borders.**

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The site habitat survey has demonstrated that the habitats on-site have low to medium biodiversity value and are non-priority habitats and none of the habitats found within the existing site boundary are listed as being the qualifying interests for the Natura 2000 sites screened in the area.

2.2.2.2 Site Hydrology and Surface Water Connectivity

Information pertaining to the existing urban site's hydrology both in a local and regional context has been derived from field evidence and the EPA Water Maps on-line – see **Figure 2.2.2.2.1**.

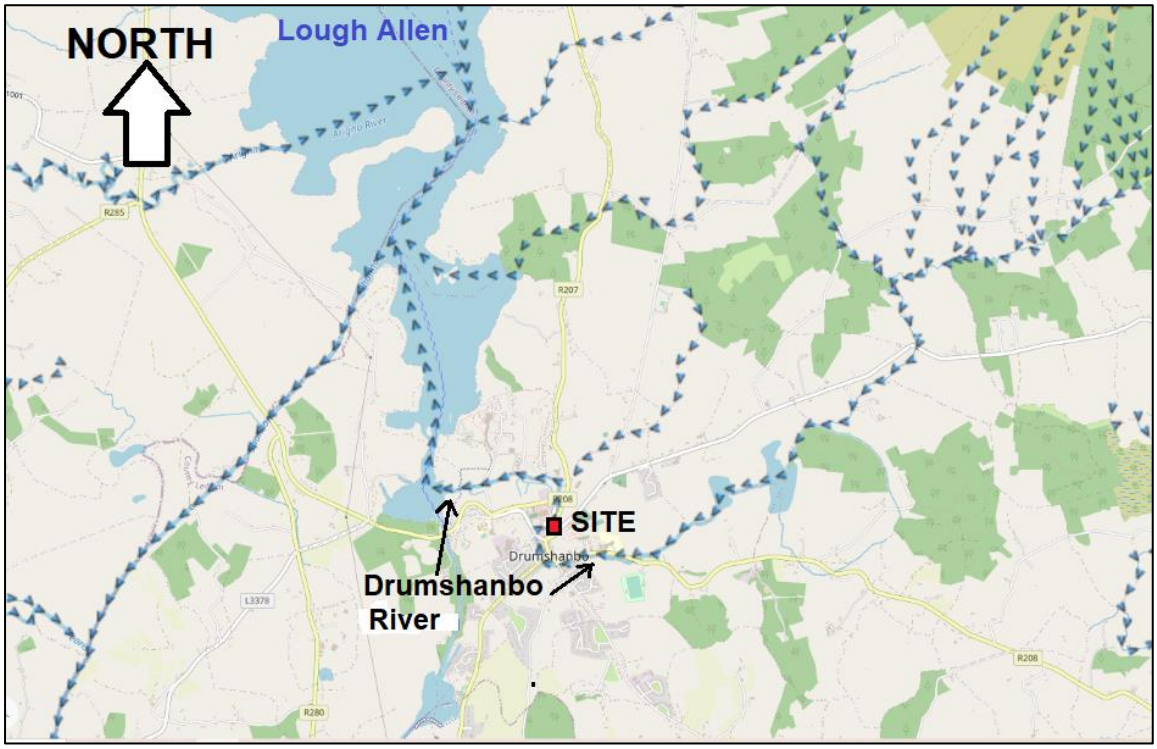

Figure 2.2.2.2.1: Regional Hydrology of the Site at Drumshanbo (Source: EPA Maps)

The Drumshanbo River flows through the urban site in a northerly direction before flowing west to north-west before joining with Lough Allen.

Separate drainage reports and plans are submitted with the planning application. Furthermore, a Flood Risk Assessment has been prepared to ensure the proposed development does not impact on flow rates and create a flood risk.

In essence the key surface water information as it pertains to Appropriate Assessment is that all foul drainage from the development will be connected to the mains sewer which is served by the Drumshanbo wastewater treatment plant located to the north-west of the town.

In addition, all new hard surfacing will be permeable with drainage going to ground, except for new car parking areas which will have permeable paving with a liner under a stone subbase with drainage to collect runoff which will pass through a petrol interceptor before discharging to the Drumshanbo River.

In conclusion the proposed works will not negatively impact upon the site hydrology which could have any potential bearing on Appropriate Assessment.

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2.2.3 Step 3: Characteristics of the Site

2.2.3.1 Zone of Influence

The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km) – (Source: *Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021*).

The identification of European sites within a 15km zone has become common practice in screening projects for AA. However this approach is not based on the S-P-R model and should not be used for projects. Few projects have a zone of influence this large, but some more complex projects may require a greater zone of investigation. Instead the zone of influence of a project should be considered using the Source-Pathway-Receptor model. This should avoid lengthy descriptions of European sites, regardless of whether they are relevant to the proposed development, and a lack of focus on the relevant European sites and issues of importance.

The zone of influence used in this screening statement is 15 km due to the urban nature of the site.

2.2.4 Step 4: Screening Findings

The proposed development site is **not** located within a Natura 2000 site (i.e. SAC or SPA). This has been confirmed through consultation with:

- NPWS website
- EPA Appropriate Assessment Screening GeoTool
- SAC and SPA maps provided at www.biodiveristyireland.ie.

The map presented as **Figure 2.2.4.1** shows the existing site outlined in red in relation to the 15km zone of influence and shows the closest Natura 2000 Site:

- Cuilcagh - Anierin Uplands SAC, Site Code 000584

The development site and all proposed works are outside of the boundary of any Natura 2000 site. The Cuilcagh - Anierin Uplands SAC is located over 5.1 km away to the north-east.

The Natura Site is located significantly upstream in an elevated upland location within the landscape, and significantly upstream from any potential drainage from the proposed development in Drumshanbo. Therefore there is no potential for any indirect impacts arising from site drainage upon Natura 2000 sites.

No other Natura 2000 sites are within 15 km of the proposed development including any sites downstream of the proposed development.

There are **n**o likely significant impacts upon Annex I Habitats or Annex II Species for which the Natura 2000 site is listed and upon which it is designated.

In conclusion, therefore, having regard to the scale, nature and operation of the development, the absence of defined connectivity and/or proximity to the nearest European site, no Appropriate Assessment issues arise and it is not considered that the proposed development

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would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

The Appropriated Assessment Screening findings and conclusions remove all reasonable scientific doubt as to the effects that the works proposed may have on the Natura 2000 site.

Table 2.2.4.1 summarises the Stage 1 Appropriate Assessment Screening information and forms the Screening Findings.

Table 2.2.4.1: Natura 2000 Site Screened against Development Site at Drumshanbo

Name	Site Code	Designation	Qualifying Interests	Distance from the site (km)	Screen in/out/uncertainty
Cuilcagh - Anierin Uplands SAC	000584	SAC	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with Erica tetralix [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Transition mires and quaking bogs [7140] Petrifying springs with tufa formation (Cratoneurion) [7220] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] Siliceous rocky slopes with chasmophytic vegetation [8220] Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]	Over km 5.1 to the north-east	**Screen Out** The SAC is outside of the site area with significant separation distance. No qualifying interests of the SAC are within the existing development site. No likelihood of drainage impacts between the sites as the SAC is over 5.1km **upstream** in an elevated upland position on the landscape and no likelihood of any significant effects upon the SAC from drainage from the site. Therefore the AA Screening findings and conclusions remove all reasonable scientific doubt as to the effects of the works proposed on the Natura 2000 site.

The Site Synopsis for the Cuilcagh - Anierin Uplands SAC, Site Code 000584 is listed in **Appendix 1** of this report.

It is acknowledged that whilst other Natura 2000 located over 15km from the development site, these are excluded as they are considered outside of the zone of influence and are screened out from screening due to the large intervening distance and the assessment that there will be no likely significant effects upon these sites.

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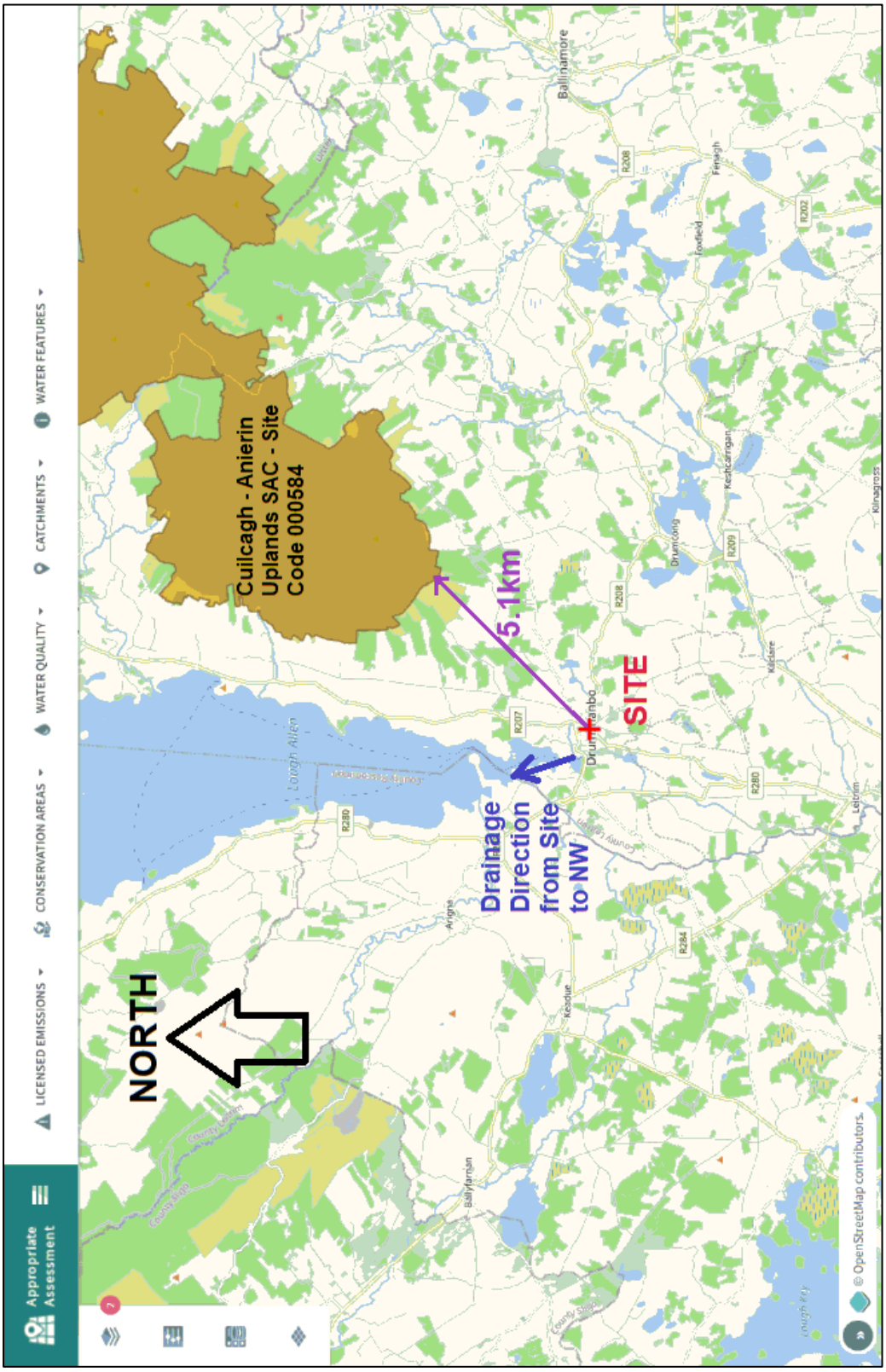

Figure 2.2.4.1: Natura 2000 Site Screening Map for the Proposed Development at Drumshanbo (Source: EPA Appropriate Assessment Tool)

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2.2.4.1 Assessment of Potential In-Combination Effects and Cumulative Impacts

In the preparation of this Appropriate Assessment screening due regard has been made to other developments within the geographical area, both existing, finished and proposed to assess any in combination and cumulative impacts. The current Leitrim County Development Plan was also subject to Appropriate Assessment and Strategic Environmental Assessment (SEA) and the development plan is the main planning guiding document for the planning authority.

There is a requirement under the EU Habitats Directive (92/43/EEC) (as transcribed into Irish law) to assess whether the Leitrim County Development Plan, individually or in combination with other plans or projects, is likely to have significant effect on a European Site, which includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in view of the site's conservation objectives.

The requirement for an assessment derives from Article 6 of the directive, and in particular Article 6(3) which requires that: "*Any plan or project not directly connected with or necessary to the conservation of a site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives*."

In recognition of this, an Appropriate Assessment (AA) Screening was carried out by Leitrim County Council. From this it was determined that AA was required, and a Natura Impact Report was prepared. The assessment of the Leitrim County Development Plan was carried out in the context of the scope and content presented in the plan.

The Natura Impact Report took a precautionary approach and assessed the impacts that would be anticipated from the plan providing the necessary inclusion of mitigation measures and guiding principles at the strategic level of the plan. The policies and objectives within the plan have been devised, as part of an iterative approach, to anticipate and avoid as appropriate measures that would likely have a significant adverse effect upon the integrity of the European Sites.

Where such measures might be permitted, on foot of provisions of the plan, they shall be required to conform to the mitigation measures contained in the Natura Impact Report (as transposed into the Leitrim County Development Plan) and to the relevant regulatory provisions aimed at preventing pollution or other environmental effects likely to adversely affect the integrity of European Sites.

The AA processes have ensured that potential environmental impacts (both positive and negative) associated with the current Leitrim County Development Plan have been given due consideration in the preparation of the plan.

In the preparation of this Appropriate Assessment screening due regard has been made to other developments within the geographical area, both existing, finished and proposed to assess any in combination and cumulative impacts.

To enable an assessment a scoping exercise was undertaken of the Leitrim Local Authority Planning Maps for this area. We have reviewed the planning history within a 400-metre radius from the project site for the previous ca. 10 years.

Figure 2.2.4.1.1 is a map taken from Leitrim County Council planning website which shows any planning applications in the vicinity of the planning application site at Drumshanbo. Any granted planning permissions have been considered for the assessment of potential in-combination effects.

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Figure 2.2.4.1.1: Extract from Leitrim County Council Planning Search Map for Drumshanbo Area showing Planning Developments Sites within ca. 400m of the Proposed Development

By virtue of any of these planning sites having being granted planning permission, Leitrim County Council will have undertaken appropriate assessment screening as the competent authority in allowing these to proceed.

Taking account of the above factors, and the similarity of this development with other permitted urban-type developments within the immediate vicinity of the site, it is considered that all in-combination impacts have been taken into account of any potential for in-combination impacts in this appropriate assessment screening.

2.2.4.2 Conservation Objectives

The following are the general Conservation Objectives of the Cuilcagh - Anierin Uplands SAC, Site Code 000584 screened:

1. To maintain the Annex I habitats for which the SAC has been selected at favourable conservation status.

2. To maintain the Annex II species for which the SAC has been selected at favourable conservation status.

3. To establish the extent, species richness and biodiversity of the entire sites.

4. To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

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Favourable conservation status of a habitat is achieved when:

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

The favourable conservation status of a species is achieved when:

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

2.2.5 Step 4: Assessment of Significance

2.2.5.1 Summary of Potential Impacts and Assessment

The following table is based on a table taken from the Box 4 of EC (2002) and sets out examples of significance indicators. This is being used as an impact prediction to assess the potential for significant impacts upon the Cuilcagh - Anierin Uplands SAC, Site Code 000584 site from the proposed works at the proposed site at Drumshanbo.

This takes into account the project location, the project description and the status and habitats of the existing site for development:

Impact Type	Significance Indicator for this Site
Loss of Habitat Area	No Loss to any part of Natura 2000 Site
Fragmentation	No fragmentation to Natura 2000 Site
Disturbance	No Direct or Indirect disturbance to Natura 2000 Site
Species Population Density	No Change or Replacement of Species Population
Water Resource	No relative change to surface waters
Water Quality	No significant direct or indirect impact

The conclusions of the assessment of impacts upon the listed Natura 2000 site has shown that there will be no likely significant impacts upon the Natura 2000 site identified by the proposed development at this site. This is further discussed below in more detail:

2.2.5.2 Impact Prediction & Conservation Objectives

2.2.5.2.1 Any impact on an Annex I habitat

The proposed site at Drumshanbo is located outside of any Annex 1 designated habitat and there will be no direct significant impacts on the Natura 2000 site or its Annex 1 habitats. The development will not impact upon the water quality of Cuilcagh - Anierin Uplands SAC, Site Code 000584 which is located over 5.1 km upstream in an elevated upland area.

Therefore, it can be concluded that the proposed development will not compromise the maintenance of Annex I habitats for which the SAC has been selected at favourable conservation status.

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2.2.5.2.2 Causing reduction in the area of the habitat or Natura 2000 site

The proposed works at the site at Drumshanbo will occur on non-priority habitats which will occur outside of the Natura 2000 site boundary by over 5.1 km.

There will be no loss of any area of Natura 2000 sites as a consequence of the proposed development and the proposed development will not result in any impact on any Annex II species of flora or fauna.

2.2.5.2.3 Causing direct or indirect damage to the physical quality of the environment (e.g. water quality and supply, soil compaction) in the Natura 2000 site

There will be no direct or indirect damage to the physical quality of the environment with the proposed development site. The site is outside of any Annex 1 designated habitat and there will be no significant impacts on any Natura 2000 site or their Annex 1 habitats.

Foul drainage from the development will be connected to the mains sewer which is served by the Drumshanbo wastewater treatment plant located to the north-west of the town.

In addition, all new hard surfacing will be permeable with drainage going to ground, except for new car parking areas which will have permeable paving with a liner under a stone subbase with drainage to collect runoff which will pass through a petrol interceptor before discharging to the Drumshanbo River.

In conclusion the proposed works will not negatively impact upon the site hydrology and cannot impact upon the water quality of Cuilcagh - Anierin Uplands SAC.

2.2.5.2.4 Causing serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination and human activity)

The proposed development site will cause no disturbance during construction works. The construction works are physically separated from Cuilcagh - Anierin Uplands SAC by over 5.1km

The development poses no potential new impact or significant impact upon the maintenance of species or habitats at the Natura 2000 site.

2.2.5.2.5 Causing direct or indirect damage to the size, characteristics or reproductive ability of populations on the Natura 2000 site

The proposed works at this site will have no direct or indirect damage to the size, characteristics or reproductive ability of populations on the Natura 2000 site - Cuilcagh - Anierin Uplands SAC.

The proposed development will not compromise or negatively impact upon water quality, which could impact upon fish populations and plant species and invertebrates upon which the birdlife feed.

2.2.5.2.6 Interfering with mitigation measures put in place for other plans or projects

The proposed development at this site will have no direct or indirect impacts upon mitigation measures put in place for other plans or projects. The proposed development is considered reasonable and well thought out and sensitive to the existing site.

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2.2.5.2.7 Potential Cumulative Effects from Other Plans or Projects upon Natura 2000 Site

The proposed development at this site at Drumshanbo will have no significant negative direct or indirect impacts upon the Cuilcagh - Anierin Uplands SAC. The development will not create a cumulative impact upon the Natura 2000 site in combination with any other plans or projects.

2.2.5.2.8 Have the Conservation Objectives Been Met

It is reasonable to determine that the conservation objectives of a European Site will be met if its habitats and species are maintained at a favourable conservation status. Given that the proposed works at the site at Drumshanbo will not have a negative impact upon the Annex 1 Habitats or Annex II Species, nor upon surface waters, it is concluded that the conservation objectives of the Cuilcagh - Anierin Uplands SAC site will be met by allowing the proposed development works to proceed.

3. Conclusions of Appropriate Assessment Screening Report

The findings and conclusions of the Appropriate Assessment Screening Report have been documented, with the necessary supporting evidence and objective criteria. The AA Screening conclusions are that the "***Drumshanbo Town Centre Regeneration Project***", will:

1. Have no significant impact upon surface water quality either during the construction phase or the post construction phase. The proposed development will not cause deterioration of water quality, and cannot have a negative impact upon the Cuilcagh - Anierin Uplands SAC Natura 2000 site which is located over 5.1 km upstream in an elevated upland area.

2. There will no loss of any Natura 2000 site area. There will be no loss or fragmentation of Annex I habitats; or Annex II species upon which any Natura 2000 site qualifies for its conservation status as a consequence of permitting the proposed development to proceed. This is due to the nature and limited scale of the proposed development and the separation distance of the actual site works from Natura 2000 site of over 5.1km.

3. There will be no cumulative impact upon any Natura 2000 sites in combination with other plans or projects.

4. The proposed development will not compromise the maintenance of Annex I habitats for which any Natura 2000 site has been selected at favourable conservation status.

5. It is concluded that the conservation objectives of the Cuilcagh - Anierin Uplands SAC site will be met as the habitats and species will be maintained at a favourable conservation status.

The AA Screening findings and conclusions remove all reasonable scientific doubt as to the effects that the works proposed may have on the Cuilcagh - Anierin Uplands SAC Natura 2000 site. There the site can be screened out of Appropriate Assessment and there is no requirement to carry out a Stage 2: Natura Impact Statement.

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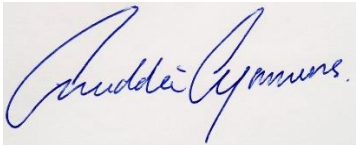
Therefore, on the basis of objective scientific and factual information pertaining to the site and the proposed works, the proposed development either individually or in combination with other plans/projects will not have any significant effects on a European site – namely Cuilcagh - Anierin Uplands SAC.

There is no scientific reason why the proposed development should be precluded from proceeding.

Yours sincerely,



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APPENDIX 1: Site Synopsis for Cuilcagh - Anierin Uplands SAC 000584

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An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht

SITE SYNOPSIS

Site Name: Cuilcagh - Anierin Uplands SAC

Site Code: 000584

This site follows a series of shale uplands in the counties of Cavan and Leitrim, including to the north, Cuilcagh Mountain on the border with Northern Ireland, Benbrack, Bencroy, and to the south, Slieve Anierin, rising above Lough Allen. It links the following pre-existing Areas of Scientific Interest: Bellavally Mountain, Cuilcagh Mountain and Lough Cratty Bog, Moneenterriff Cliffs and Levenakilla Bog. The site is of special interest because of its geology, physiography and upland flora and fauna.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (* = priority; numbers in brackets are Natura 2000 codes):

[3110] Oligotrophic Waters containing very few minerals
[3160] Dystrophic Lakes
[4010] Wet Heath
[4030] Dry Heath
[4060] Alpine and Subalpine Heaths
[6230] Species-rich *Nardus* Grassland*
[7130] Blanket Bogs (Active)*
[7140] Transition Mires
[7220] Petrifying Springs*
[8110] Siliceous Scree
[8220] Siliceous Rocky Slopes
[1393] Slender Green Feather-moss (*Drepanocladus vernicosus*)

Geological interest is comprised of the complete representation of the Carboniferous Leitrim Group, including richly fossiliferous sequences of sandstones, shales and mudstones. Physiographical interest relates to various active processes, notably slope weathering, as well as the presence of peat and pseudo-karst features. The total sequence on the Upper Cuilcagh area provides an excellent section through approximately 560 m of the Leitrim Group of Carboniferous rocks. On the lower ground, particularly on east Cuilcagh, a series of potholes or shakeholes (dry vertical shafts) and sinks (shafts and surface water plunges) have developed on limestone. Pollnagallun is one of these. Landforms due to past and present processes are also noticable and include periglacial rock shattering throughout the area, associated blockfields at the edges (Moneenterriff), rock slides throughout and bog flows.

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The biological interest of the site is associated with the presence of one of the largest expanses of intact mountain blanket bog in Ireland (seen at Cratty's Lough at the north-east of the site), and also with upland grasslands on the steepest slopes of the peaks, fine examples of dry heath on the less steep slopes of these peaks and a gradation from these to wet heaths and wet rush (*Juncus* spp.) grasslands. A well-developed oceanic, montane bryophyte flora exists throughout. At the tops of ridges such as at Slieve Anierin, Bencroy, Benbrack and at The Playbank, on level terrain at the slope bases, and often sandwiched between two succeeding slopes, blanket peat also occurs. The extensive blanket bog exhibits a wide range of characteristic vegetation and structural features, with well-developed pool/hummock and lawn complexes, drier peat, acid flushes and bog bursts. The presence of a large number of streams (or river sources) adds to the biological interest.

Flat blanket peat areas on water-logged ground is characterised by the presence of such species as Deergrass (*Scirpus cespitosus*), Cross-leaved Heath (*Erica tetralix*), Bog Asphodel (*Narthecium ossifragum*), Common Cottongrass (*Eriophorum angustifolium*) and small amounts of Heather (*Calluna vulgaris*) over a bog moss mat of predominantly *Sphagnum capillifolium* and *S. papillosum*.

On more freely-draining gentle slopes, abundant and tall Heather, Bilberry (*Vaccinium myrtillus*) and Hare's-tail Cottongrass (*E. vaginatum*) are more typical over a mixed bryophyte layer of *Sphagnum capillifolium, Hypnum jutlandicum* and *Rhytidiadelphus* spp. The presence of weak flushing of acidic water through the surface peat layer is indicated by the occurrence of sparsely scattered Purple Moor-grass (*Molinea caerulea*) or Sharp-flowered Rush (*Juncus acutiflorus*). The rare moss *Drepanocladus vernicosus*, a species protected under the Flora (Protection) Order 2015 and listed on Annex II of the E.U. Habitats Directive, is found in a flush in Commas Townland.

Where flushing is concentrated over a thinner peat or a peaty gley soil or is associated with iron-staining, the vegetation is characterised by a small sedge (*Carex* spp.) community with Lesser Spearwort (*Ranunculus flammula*), butterwort (*Pinguicula* spp.), Water Forget-me-not (*Myosotis scorpioides*), Cuckooflower (*Cardamine pratensis*), Common Marsh-bedstraw (*Galium palustre*), Water Horsetail (*Equisetum fluviatile*) and a range of non-ombrotrophic bryophytes.

A small number of oligotrophic lakes occur within the site, with Lough Nambrack, Knockgorm Lake and Munter Eolas Lough being the main examples. These often have limited vegetation. Scattered throughout the site are dystrophic lakes, with peat bases and often peat-stained water. These lakes typically have sparse vegetation, with Common Cottongrass, Bogbean (*Menyanthes trifoliata*) and *Sphagnum* mosses being the dominant plants.

Sloped ground and areas of shallow peat support heath communities. Wet heath is extensive and is dominated by Cross-leaved Heath, Heather, Bilberry, Purple Moor-grass, Tormentil (*Potentilla erecta*), Heath Rush (*Juncus squarrosus*), and mosses in the following groups: *Rhytidiadelphus* spp., *Sphagnum* spp. and *Polytrichum* spp. Dry

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heath is also well-represented within the site and is typically found where shallow peats occur on sloped ground in association with exposed rock. Heather is usually the dominant species in the vegetation, and is often accompanied by Bilberry, Bell Heather (*Erica cinerea*) and, in places, Gorse (*Ulex europaeus*). Tormentil and Heath Bedstraw (*Galium saxatile*) are also common species. Crowberry (*Empetrum nigrum*) is a scarcer species of the dry and alpine heath vegetation. Upland grassland frequently merges with the heath community and is dominated by Mat-grass (*Nardus stricta*) and bent grasses (*Agrostis* spp.), with Heath Bedstraw, Lousewort (*Pedicularis sylvatica*) and Tormentil also common. In places it is considered to be species rich. In wetter areas, the grassland communities are dominated by rushes (*Juncus effusus*, *J. acutiflorus* and some *J. articulatus*).

Inland cliffs of shale and sandstones, as well as gorges and scree slopes, are a feature of this large mountain site. Good examples occur at Moneenterriff, south and north-west of Cuilcagh Mountain, Bellavally Gap and east and west of Slieve Anieran. Here the heathy vegetation is augmented by typical cliff and scree species, particularly ferns such as the Broad Buckler-fern (*Dryopteris dilatata*). These areas are generally rich in bryophytes and ferns. The rare and unusual moss *Discelium nudum* is associated with exposed shaly clay on incised stream banks in the lower parts of the site.

On the low steep slopes at the north-east of the site, such as at Gorteennaglogh, some small areas of Hazel (*Corylus avellana*) woodland add to the habitat diversity of the site. A small number of unimproved enclosed fields are also included on the edges of the site.

A number of locally rare plant species, including the Red Listed moss *Dicranodontium asperulum*, occur. Other species found on the site which are scarce in Ireland or in the Leitrim/Cavan area include White Sedge (*Carex curta*), Common Yellow-sedge (*C. demissa*), Bog-sedge (*C. limosa*), Blue Moor-grass (*Sesleria albicans*), Cowberry (*Vaccinium vitis-idaea*), Beech Fern (*Phegopteris connectilis*), Lesser Twayblade (*Listera cordata*), Starry Saxifrage (*Saxifraga stellaris*), Stag's-horn Clubmoss (*Lycopodium clavatum*), and the lichens *Cladonia anomaea, C. bellidiflora, C. ciliata* var. *tenuis, C. crispata* var. *cetrariiformis, C. incrassata, C. coniocraea, C. pyxidata* and *C. strepsilis*.

The site provides good habitat for breeding wading birds, with Curlew, Golden Plover and Dunlin nesting in small numbers. Other typical upland species such as Peregrine, Merlin and Ring Ouzel are also present. Golden Plover, Peregrine and Merlin are listed on Annex I of the E.U. Birds Directive and, along with Dunlin and Ring Ouzel, are Red Data Book species. Red Grouse, also a Red-listed species, is present on the site.

The blanket bog areas of this site are extensive and relatively undisturbed. Natural transitions from blanket bog to heath and acidic grassland are evident, and cliffs, small ravines and small woodland blocks add diversity to the site.