Rialtas na hÉireann
Government of Ireland

# Screening for Appropriate Assessment

## Determination on non-native vegetation (Sitka Spruce *Picea sitchensis*) removal within Horn Head and Rinclevan Special Area of Conservation and Horn Head to Fanad Head Special Protection Area in accordance with Regulation 42A EC (Birds and Natural) Habitats Regulations 2011-2021

Prepared by the Department of Housing, Local Government and Heritage
**npws.ie**

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# 1. Introduction

This determination on Screening for Appropriate Assessment (AA) has been made by the Ecological Assessment Unit (EAU) of the Department of Housing, Local Government and Heritage (DHLGH) in accordance with Regulation 42A(8) of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 ('the 2011 Regulations").[1]

On the 10th March 2026, in accordance with the requirements of Regulation 42A(3) of the 2011-2021 Regulations, the Minister for Housing, Local Government and Heritage ('the Minister') furnished the EAU with a request for a Screening for Appropriate Assessment (AA) determination for the removal of non-native conifer (Sitka spruce *Picea sitchensis*) removal within Horn Head and Rinclevan Special Area of Conservation [Site Code: 000147] and Horn Head to Fanad Head Special Protection Area [Site Code: 004194] for the purpose of restoring the favourable conservation status of fixed coastal dune habitat. Hereafter referred to as "the project".

The proposed necessary conservation measures are part of LIFE Insular, a European Union funded project which has been developed to support the strategic trans-national restoration of insular habitats, specifically; Fixed coastal dunes with herbaceous vegetation ('grey dunes') [2130*] and; European dry heaths [4030].

The EAU have evaluated and analysed the information contained in the referred to above documents and location maps provided and carried out a determination. The purpose of this document is to provide a record and an audit trail of the EAU reasoned thinking in view of best scientific information and the Conservation Objectives of European Sites. This determination does not constitute consent or authorisation for the proposed works. The proponent is responsible for ensuring that all other necessary consents, licences, or permissions are obtained, including, where relevant, a declaration under Section 5 of the Planning and Development Act 2000 (as amended).

[1] As inserted by Regulation 7 of the European Union (Birds and Natural Habitats) (Amendment).

## 2. Background

Pursuant to Regulation 42A(1) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), a Screening for AA is required to be carried out on the project. AA is a process required under Article 6(3) of the EU Habitats Directive. Article 6(3) is transposed in Ireland by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended, and by Part XAB of the Planning and Development Act, 2000, as amended.

All plans and projects which are not directly connected with or necessary to the management of a European Site, but which either individually or in combination with other plans or projects, are likely to have a significant effect on a “European Site”, require an AA of these effects to determine if they will adversely affect the integrity of these sites. The proposed necessary conservation measures are considered to fall under the requirements of AA as applied to all plans and projects.

The Screening for AA process scrutinises the plan or project to determine if there is potential for likely significant effects either individually or in combination with other plans or projects, on a European Site. European Sites are part of the Natura 2000 network and include those designated as Special Areas of Conservation (SAC), Candidate SACs (cSACs) or Special Protection Areas (SPA). This Screening for Appropriate Assessment describes the outcome of this analysis in respect of the project.

# 3. Legislation and Guidance

This section provides details on the adopted methodology with sources of guidance and information gathered to inform the preparation of the report.

## 3.1. Guidance and Data Sources

- AA under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10;
- Communication from the Commission on the precautionary principle. European Commission (2000);
- Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC (European Commission, 2007);
- AA of Plans and Projects in Ireland - Guidance for Planning Authorities (Department of Environment, Heritage and Local Government, 2010 revision);
- Guidelines for Good Practice AA of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011);
- Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2018); [hereafter referred to as MN 2018];
- Office of the Planning Regulator Practice Note PN01 - AA Screening for Development Management (OPR, 2021); and,
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2021).

## 3.2. Assessment Methodology

This report is based on review of desktop data. Sources of information utilised for this report and accessed during April 2026 include the following:

- National Parks & Wildlife Service (NPWS) Designations Viewer[2]; and,
- National Biodiversity Data Centre (NBDC) Maps[3].

## 3.3. Legislative Background

According to the EU Habitats Directive (92/43/EEC) and the EU Birds Directive (79/409/EEC), Member States are required to establish a 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 SACs, candidate SACs and SPAs.

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and all migratory birds and their habitats. The Annex habitats and species, for which each site is selected, are the qualifying interests (QI) for SACs and special conservation interests (SCI) for SPAs of each site. Conservation objectives for the site are defined for these QI/SCI.

A key requirement of the Habitats Directive is that the effects of any plan or project, which is not directly connected with or necessary to the management of a European Site, but which alone, or in combination with, other plans or projects, are likely to have a significant effect on a European Site, should be assessed before any decision is made to allow that plan or project to proceed. The obligation to undertake a screening for AA, and if necessary, an AA, derives from Article 6(3) of the Habitats Directive and both involve a number of steps and tests that need to be applied in sequential order.

Article 6(3) is concerned with the strict protection of sites, while Article 6(4) is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

[2] National Parks & Wildlife Service Designation Viewer. Accessed at ArcGIS Web Application 16/04/2026

[3] National Biodiversity Data Centre Maps. Accessed at Maps - Biodiversity Maps (biodiversityireland.ie) 16/04/2026

Article 6(3) of the Habitats Directive states:

> "Any plan or project not directly connected with, or necessary to, the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and if appropriate, after having obtained the opinion of the general public".

Article 6(4) states:

> "If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.
>
> Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

The competent authority is required to carry out a screening for AA, and if necessary, an AA as required by Article 6(3) of the Habitats Directive. If the competent authority determines that the plan or project will adversely affect the integrity of a European site, it may only authorise that plan or project by following the Article 6(4) procedure.

The Article 6(3) and 6(4) procedures are outlined as follows:

**Stage 1 - Screening for Appropriate Assessment** – to assess, in view of best scientific knowledge, if the project or plan, individually or in combination with another plan or project is likely to have a significant effect on the Natura 2000 site.

**Stage 2 - Appropriate Assessment** – This is required if it cannot be excluded, on the basis of objective information, that the project or plan, individually or in combination with other plans or projects, will have a significant effect on a Natura 2000 site. The AA must include a final determination by the competent authority as to whether or not a proposed project would adversely affect the integrity of a Natura 2000 site. In order to reach a final determination, the competent authority must undertake examination, analysis and evaluation, followed by findings, conclusions and a final determination. The appropriate assessment must contain complete, precise and definitive findings and conclusions, and may not have lacunae or gaps.

**Stage 3 – Assessment of alternative solutions** - 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.

**Stage 4 - Assessment where no alternative solutions exist and where adverse impacts remain** - an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

Under Regulation 42A(1) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), the Ecological Assessment Unit is the competent authority in relation to screening for AA of projects and plans (such as the proposed conservation measures) which the Minister proposes to undertake or adopt.

## 4. Overview of the Project

Horn Head and Rinclevan Special Area of Conservation [Site Code: 000147] (Figure 1) extends northwards into the Atlantic Ocean from Dunfanaghy, Co. Donegal. This site also extends westwards, reaching just beyond Dooros Point. It is a diverse coastal site containing a wide range of habitats from high rocky quartzite cliffs in the north to mud flats, sand flats, dunes and a brackish lake in the south. The New Lake to the east of the project location is managed as a Wildlife Sanctuary by the National Parks and Wildlife Service.

In the south-western part of the site is a dune system which is impressive in terms of its size, range of dune types and its relatively undisturbed nature. Dune types which occur within the area of the project are; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Dunes with *Salix repens ssp*. argentea (*Salicion arenariae*) [2170], and; Humid dune slacks [2190] (Figure 2).

A small population of the rare liverwort; Petalwort (*Petalophyllum ralfsii*) [1395], a species that is listed on Annex II of the E.U. Habitats Directive, has been recorded from a grassy hillside in the southwest of the site and Geyer's Whorl Snail (V*ertigo geyeri)* [1013] occurs to the north of the proposed fencing location (Figure 3).

The Horn Head to Fanad Head SPA comprises a number of separate sections of the north Co. Donegal coastline stretching some 70 km eastwards from Dooros Point, south-west of Horn Head to just south of Saldanha Head, south of Fanad Head. The site includes the high coast areas and sea cliffs, land adjacent to the cliff edge and the sand dunes and lake at Dunfanaghy/Rinclevan.

The cliffs around Horn Head are of particular importance to a large assemblage and wide variety of nesting seabirds. New Lake/Rinclevan and the dunes to the west (west-south-west of Dunfanaghy) support nationally important Greenland White-fronted Goose (*Anser albifrons flavirostris*) [A395] and Barnacle Goose (*Branta leucopsis*) [A045] populations, with the Greenland White-fronted Goose flock having increased in size since the 1980s. The geese feed on the dune grassland and on intensive grassland. Whooper Swan (*Cygnus cygnus*) also occurs regularly, along with a range of other waterfowl species, notably Pochard (*Aythya farina*), which are well suited to the shallow lake waters. The Horn Head to Fanad Head SPA is also of high importance for Chough (*Pyrrhocorax pyrrhocorax*) [A346] and Peregrine (*Falco peregrinus*) [A103], both species that are listed on Annex I of the E.U. Birds Directive.

The LIFE Insular Project is an EU LIFE funded project with a trans-national scope which includes sites in northwest Spain and Spanish Micronesia. A number of the Irish project sites are in Co. Donegal with one site at Raven Point in Co. Wexford. The main focus of the project is on the restoration and conservation of Annex I Habitats - Fixed coastal dunes with herbaceous vegetation ('grey dunes') [2130*] and; European dry heaths [4030] The project is being coordinated by the Department

of Housing, Local Government and Heritage through collaboration with project partners; Coillte.

## 5. Purpose

At Lurghabrack Nature Reserve in the south of the Horn Head and Rincleven Special Area of Conservation near New Lake, non-native conifer tree species were planted on sand dunes in a bid to protect against coastal erosion from Dunfanaghy Bay to the East. It is now recognised that fixed coastal dunes are the optimal natural feature for coastal protection and thus the project intends to restore these protected habitats at the location.

The over-arching purpose of the project is in line with the objectives of the LIFE Insular Programme and includes; increasing the area covered by Annex I Habitats 2130* and 4030, including elimination of old forest plantations, cultivation of characteristic plant species of insular habitats and their restoration.

Throughout its implementation the project partners will improve the future prospects of insular 2130* habitat, through the improvement of habitat knowledge locally and the promotion of protection measures against anthropogenic pressures. This will involve informing the public and raising awareness about the relevance, natural values and ecosystem services provided by insular ecosystems, as well as the issues targeted and the solutions provided by the project, at a transnational level.

It is envisaged that the project will leave a positive legacy by transferring the measures developed, through specific replication and networking strategies, for their replicability at EU level.

## 6. Project Description

The project will involve felling and removal of target non-native trees within a 10.5 Ha area within the SAC (Figure 3). Access to the site will be along an existing road to the east of the site. Small regenerating exotics will be manually pulled. Some use of a treatment with glyphosate of non-native Sitka spruce trees may be required to control regrowth. The use of herbicide will be carried out by a certified contractor implementing the Best Available Techniques for herbicide control of non-native woody species. The felling of these non-native trees will allow for the restoration of the fixed coastal dune habitat.

- All cleared sites in an area where seed input is ongoing will require ongoing management so that re-infestation from seed is not allowed to succeed.
- The project must regularly and systematically be followed-up as required to deal with re-growth and seedling germination within the defined management areas.
- As long as an external seed source remains, repeated systematic sweeps through the site will be required, to prevent newly established plants from reaching reproductive maturity and setting seed.

- A record of the total amount of herbicide used and the dilution rates must be supplied to the supervising officer on completion of the contract.
- Contractor Materials: Storage of materials and refilling of equipment will be off site and in a secure location. All materials used for the chemical treatment of Sitka spruce will be removed from the areas on completion of works

The Project Manager will liaise with Regional NPWS staff to ensure that surveys and up to date field data informs the roll out of the control project. If elements of the project are required to take place during the bird nesting season (1st March- 31st August inclusive) there is provision for, notwithstanding anything contained in Section 40 of the Wildlife Act 1976-2023 (prohibits the cutting, grubbing, burning or other destruction of vegetation growing on “any land not then cultivated” between 1st March and 31st August annually), the authorisation for the destruction of vegetation comprising the species of flora or vegetation that the Minister considers poses a threat to the objectives of the Birds Directive or the Habitats Directive under Regulation 49(13) of the European Communities (Birds and Natural Habitats) 2011 - 2021. The Project Manager and/or a NPWS Authorised Officer will ensure this work is undertaken under licence and that the project can progress (access, route and egress) in compliance with Section 22 and Section 23 of those Acts prior to works (where applicable).

The Project Manager will ensure best practice guidance on correct invasive and non-native species control procedures are adhered to. Work will be reviewed by the Project Manager and/or a NPWS Authorised Officer at regular intervals to ensure that correct procedures are being followed. The supervising officer or his/her representative may instruct the contractor to carry out the works in a particular order and/or to defer works for a period for reasons of conservation or safety.

Monitoring is an action of LIFE Insular, with long-term restoration monitoring included in the After-LIFE Plan. Vegetation will be resurveyed along existing baseline transects, and the area included in regular Article 17 coastal habitat surveys.

## 7. Part 1: Necessary conservation measures

Answer these questions if the activity is “directly connected with or necessary to the management of the site”. Otherwise go to Part 2.

a). List the European site(s) and the relevant Conservation Objectives (include version number of the Conservation Objective).

**Horn Head and Rinclevan SAC** [Site code: 000147].

NPWS (2014) Conservation Objectives: Horn Head and Rinclevan SAC 000147. Version 1. Accessed 16th April 2026.

Available at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000147.pdf

**Qualifying Interests**

Embryonic shifting dunes [2110]

~ *Overall conservation status:* **Inadequate**

Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]

~ *Overall conservation status:* **Inadequate**

Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]

~ Overall conservation status: **Bad**

Dunes with Salix repens ssp. argentea (Salicion arenariae) [2170]

~ *Overall conservation status:* **Inadequate**

Humid dune slacks [2190]

~ *Overall conservation status:* **Inadequate**

Machairs (* in Ireland) [21A0]

~ *Overall conservation status:* **Inadequate**

Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]

~ *Overall conservation status:* **Inadequate**

Vertigo geyeri (Geyer's Whorl Snail) [1013]

~ *Overall conservation status:* **Bad**

Halichoerus grypus (Grey Seal) [1364]

~ *Overall conservation status:* **Favourable**

Petalophyllum ralfsii (Petalwort) [1395]

~ *Overall conservation status:* **Favourable**

Najas flexilis (Slender Naiad) [1833]

~ *Overall conservation status:* **Bad**

**Conservation Objectives for Qualifying Interests.**

**Embryonic shifting dunes [2110]**

To maintain the favourable conservation condition of Embryonic shifting dunes in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Physical structure: functionality and sediment supply.
- Vegetation structure: zonation.
- Vegetation composition: plant health of fore-dune grasses; typical species and sub-communities; and, negative indicators species.

**Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]**

To maintain the favourable conservation condition of Shifting dunes along the shoreline with Ammophila arenaria (white dunes) in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Physical structure: functionality and sediment supply.

- Vegetation structure: zonation.
- Vegetation composition: plant health of dune grasses; typical species and sub-communities; and, negative indicators species.

**Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]**

To maintain the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation (grey dunes) in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Physical structure: functionality and sediment supply.
- Vegetation structure: zonation.
- Vegetation composition: plant health of dune grasses; typical species and sub-communities; and, negative indicators species.

**Dunes with Salix repens ssp. argentea (Salicion arenariae) [2170]**

To maintain the favourable conservation condition of Dunes with *Salix repens* ssp. *argentea* (*Salix arenariae*) in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Physical structure: functionality and sediment supply
- Vegetation structure: zonation; bare ground; and, vegetation height
- Vegetation composition: typical species and sub-communities; cover and height of *S. repens*; negative indicator species; and, scrub/trees.

**Humid dune slacks [2190]**

To restore the favourable conservation condition of Humid dune slacks in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Physical structure: functionality and sediment supply; hydrological and flooding regime
- Vegetation structure: zonation; bare ground; and, vegetation height
- Vegetation composition: typical species and sub-communities; cover and height of *S. repens*; negative indicator species; and, scrub/trees.

**Machairs (* in Ireland) [21A0]**

To maintain the favourable conservation condition of Machairs (* in Ireland) in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Physical structure: functionality and sediment supply; and, hydrological and flooding regime.
- Vegetation structure: zonation; bare ground; and, sward height.
- Vegetation composition: typical species and sub-communities; and, negative indicators species.

**Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]**

To maintain the favourable conservation condition of Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea in Horn Head and Rinclevan SAC, which is defined by the following list of attributes

- Habitat area.
- Habitat distribution.
- Typical species.
- Vegetation composition: characteristic zonation.

- Vegetation distribution: maximum depth.
- Hydrological regime: water level fluctuation.
- Lake substratum quality.
- Water quality: transparency; nutrients; phytoplankton biomass; phytoplankton composition; attached algal biomass; and, macrophyte status.
- Acidification status.
- Water colour.
- Dissolved organic carbon (DOC).
- Turbidity.
- Fringing habitat: area and condition.

**Vertigo geyeri (Geyer's Whorl Snail) [1013]**

To maintain the favourable conservation condition of Geyer's Whorl Snail (*Vertigo geyeri*) in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Distribution.
- Occurrence in suitable habitat.
- Habitat area.
- Habitat quality.
- Habitat quality: soil wetness.

**Halichoerus grypus (Grey Seal) [1364]**

To maintain the favourable conservation condition of Grey Seal in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Access to suitable habitat.
- Breeding behaviour.
- Moulting behaviour.

- Resting behaviour.
- Population composition.
- Disturbance.

**Petalophyllum ralfsii (Petalwort) [1395]**

To maintain the favourable conservation condition of Petalwort in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Habitat area.
- Population size.
- Area of suitable habitat.
- Hydrological conditions: soil moisture.
- Vegetation: open structure.

**Slender Naiad Najas flexilis [1833]**

To maintain the favourable conservation condition of Slender Naiad in Horn Head and Rinclevan SAC, which is defined by the following list of attributes:

- Population: extent; depth; viability; abundance.
- Species distribution.
- Habitat extent.
- Hydrological regime: water level fluctuations.
- Lake substratum quality.
- Water quality.
- Acidification status.
- Water colour.
- Associated species.
- Fringing habitat: area and condition.

- Extent of marine habitat.

b). State how this activity furthers the Conservation Objective(s)

Under Article 6 of the EU Habitats Directive, DHLGH is required to ensure the favourable conservation status of all Annex I habitats and Annex II species within SACs.

The Conservation Objectives seek to maintain protected SAC feature(s) where evidence exists that it is in favourable condition in the site, or where there is uncertainty concerning the assessed condition of a feature but no reason to suspect deterioration in condition since designation.

Where evidence exists that a feature is declining and/or damaged and therefore not in a favourable condition in the site, the Conservation Objectives will seek to restore the protected feature.

Areas of Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] in Horn Head and Rinclevan SAC are considered as in an unfavourable condition and therefore the Conservation Objectives seek to restore this condition. The measures proposed have all been previously trialled and shown to be practical and effective.

The implementation of the restoration measures within the site as outlined above will directly contribute to the Site Specific Conservation Objectives. Notably:

Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]

- **Habitat area.**
- **Physical structure: functionality and sediment supply.**
- **Vegetation composition: typical species and sub-communities; and, negative indicators species.**

In the absence of the project, the Conservation Objectives for Horn Head and Rinclevan SAC would not be achieved as there would be continued highly detrimental impacts of invasive non-native tree species, dramatically reducing levels of semi-natural habitat cover and species richness.

Particular threats to Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] will increase, with encroachment and damage to the habitats rich flora. The project will be beneficial to maintaining and working towards achieving favourable conservation condition of the fixed

coastal dune habitats in the site and the typical species of these protected habitat types.

c). Does this activity have the potential to impact negatively on any Conservation Objective (CO), Qualifying Interest (QI)/Special Conservation Interest (SCI) for this or any other European site?

The effect on all European Sites and their QI/SCI within a defined Zone of Influence of the proposed project has been assessed using expert opinion.

The small size of the Petalwort (*Petalophylum ralfsii*) population at this site makes it vulnerable to changes in land use (either through under or over-grazing), as well as trampling and land slippage. A review of the most up to date spatial data has shown that Petalwort is present in the south-western section of the site, hence it is separated from the proposed project location by a distance of approximately 2km, thereby eliminating the likelihood for negative impacts on the species.

Geyer's Whorl Snail (*Vertigo geyeri*) [1013] occurs to the north of the proposed project location. With the nearest likelihood of occurrence at approximately 1km from the project, there is not expected to be any likelihood of negative impacts on this Annex II species.

Access for project materials and machinery will be along an existing track in highly modified/recreational areas, ensuring no disturbance or damage to any protected habitats.

The potential for likely significant effects arising on the adjoining Horn Head to Fanad Head SPA [Site code: 004194] have been considered in detail.

Many of the Special Conservation Interests species for which the SPA has been designated are coastal sea birds, utilising nearby sea cliffs for nesting and breeding. They are obligated to the marine biome and rarely venture as far inland as the project location. Nonetheless, the project will be implemented in September, which will eliminate all potential for disturbance during peak nesting period. Other SCI species which are more likely to be encountered inland, such as; Peregrine (*Falco peregrinus*) [A103], and; Chough (*Pyrrhocorax pyrrhocorax*) [A346] are transient species with large home ranges, meaning that they will naturally avoid the location during the short time period that the measures are active.

Due to reported decreasing population trends and the sensitivity of Greenland White-fronted Goose (*Anser albifrons flavirostris*) [A395], potential for disturbance arising from the proposed works has been considered. A review of contemporary and historical data on roost site use in the SPA and surrounding lands in relation to the project has been

undertaken along with a site visit by an EAU ecologist. Potential effect of disturbance is considered negligible; given the closest distance of the proposed project measures to known roost and/or feeding areas are >1.3km; that practical work is at targeted sites away from known roost and feeding sites only and that measures are proposed to be carried out in September before the arrival of the species to over-winter in Ireland.

Neither does the temporal or spatial scale of the proposed conifer removal interact with favoured feeding and roosting areas of Barnacle Goose (*Branta leucopsis*) [A045] within the SPA. There is a dune ridge between the location and the lake and improved fields used by the geese and swans. Activity during conifer removal is not likely to cause any disturbance beyond a *de minimis* level to geese and swans as practical work will extend over the short-term at a single location.

The Project Manager will liaise with Regional NPWS staff to ensure that surveys and up to date field data informs the roll out of the project. If any maintenance or follow-up work is required to take place during the bird nesting season (March- end of August inclusive), the Project Manager and/or a NPWS Authorised Officer(s) will ensure the project can progress (access, route and egress) in compliance with Section 22 and Section 23 of those Acts prior to works (where applicable).

A review of best available scientific information has been undertaken to inform the project and the effect on all QIs of the SAC and all SCIs of the SPA have been considered. Given the targeted location and short temporal scale of works, the proposal is not considered likely to result in significant effects on the conservation objectives of QI habitats. There is not considered to be any potential for disturbance beyond a *de minimus* level on QIs/SCIs for which the Horn Head and Rinclevan Special Area of Conservation [Site Code: 000147] and Horn Head to Fanad Head Special Protection Area [Site Code: 004194] are designated.

Yes ☐ No ☑

d). Are there aspects of this activity which are NOT directly connected with the management of the site?

Yes ☐ No ☑

If the answer to EITHER of the above questions is **Yes** a Screening for AA is required, go to Part 2.

If the answer to BOTH questions is **No** go to Part 5.

## 8. Part 2: Identification of European Sites within the Potential Zone of Influence of proposed activities

List all European sites which may be affected by this activity because they are linked by an ecological pathway. If the site has a second European designation (SAC, SPA) this also needs to be considered.

## 9. Part 3: Assess the likelihood of significant effects

Provide this information for **each site** listed in Part 2.

List the QI/SCIs for the site(s), their current conservation condition and the Site Specific Conservation Objectives (SSCO) for that QI/SCI. Then answer the questions about the impact on that QI/SCI.

Tick all the boxes below which may apply.

Your answer will determine if the activity is likely to have a (negative) effect on this QI/SCI. Negative effects may arise because of the activity's location within the site; its proximity to the QI/SCI or the size of the land take involved; the abstraction of water or minerals; emissions or waste arising; the types of transport or machinery being used; the length of time involved or seasonality of the work.

a). There is likely to be a reduction in the area of QI/SCI habitat ☐

b). The physical/chemical quality of the environment is likely to be changed in a way which may cause the deterioration of the QI/SCI habitat (e.g. applying lime to an acidic soil) ☐

c). The structure of the ecological community is likely to be altered (e.g. through altered species composition) in a way which will have negative impact on the QI/SCI. ☐

d). A QI/SCI species is likely to be disturbed (e.g. through noise, vibrations) ☐

e). The population size, characteristics or reproductive success of a QI/SCI species is likely to be changed either directly or indirectly (e.g. lighting close to a bat roost entrance) ☐

f). QI/SCI species or habitats are likely to be more vulnerable to change or less resilient to external change (e.g. to flooding, fire or drought) ☐

g). There are likely to be effects on other species /habitats (not a QI/SCI for this site) which are ecologically linked with this QI/SCI and, as a consequence, there are likely to be negative effects on this QI/SCI (e.g. the impacts on geese which are the SCI when their non-QI feeding areas are damaged). ☐

h). This activity will cause a deterioration in the conservation condition of this QI/SCI. ☐

i). There are likely to be other ecological effects not listed above which are likely to have a significant effect on the QI/SCI. ☐

Explain the effects:

_____

**If you have ticked a box for any QI/SCI in any of the sites affected by this activity the likelihood of a significant effect cannot be ruled out and the activity MUST be screened IN for AA.**

## 10. Part 4: In Combination Effects

Is this activity likely to cause negative effects in combination with any other plan or project?

(In answering this question you should consider any other consents which have been applied for or granted. For example, other ARCs, planning consents, forestry consents, or activities authorised as part of an agreed farm or land management plan. List the plans or projects considered).

The following recent projects have been assessed in combination with the proposed project.

- 06/02/2026b 42A Screening LIFE on Machair Horn Head and Rinclevan SAC (Predator fencing) Screened Out.
- 10/03/2026i 42A Screening CMU 26-022 Horn Head and Rinclevan SAC (Nest Protection) Screened Out.

Due to the temporal and spatial scales of each relevant project and the necessary conservation elements comprised within there is considered to be no potential for in combination effects.

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**No** ☑ **Yes** ☐ **Uncertain** ☐

**If the answer is Yes or Uncertain the activity MUST be screened IN for AA. Fill in Part 5 accordingly.**

## 11. Part 5: Findings of the Screening for AA

Screening not carried out as the activity is “directly connected with or necessary to the management of the site”. ☑

Likely significant effects are expected or uncertain.

This activity Screens **IN** and AA **is** required. ☐

Likely significant effects are NOT expected.

This activity Screens **OUT** AA **is not** required. ☐

Prepared by: Darren Ellis, Ecologist, Ecological Assessment Unit.

Signed:

Date: 16th April 2026

## 12. Part 6: Determination

Following an analysis of the activity, the EAU determines, in accordance with Regulation 42A(8) of the 2011 Regulations, that the proposed non-native conifer (Sitka spruce *Picea sitchensis*) removal measures within the Horn Head and Rinclevan Special Area of Conservation and Horn Head to Fanad Head Special Protection Area are entirely comprised of activities that directly support the Conservation Objectives of this European site(s).

It can be concluded with certainty that the project is a necessary conservation measure that is directly connected with or necessary for the management of the site.

Determined by: Laura Connolly, Ecologist, Ecological Assessment Unit

Signed:

Date: 17th April 2026

# 13. Supplementary Information

Figure 1 (below): Location of Horn Head and Rinclevan SAC as per NPWS (2024) Conservation Objectives: Horn Head and Rinclevan SAC 000147. Version 2. Project location indicated by yellow arrow.

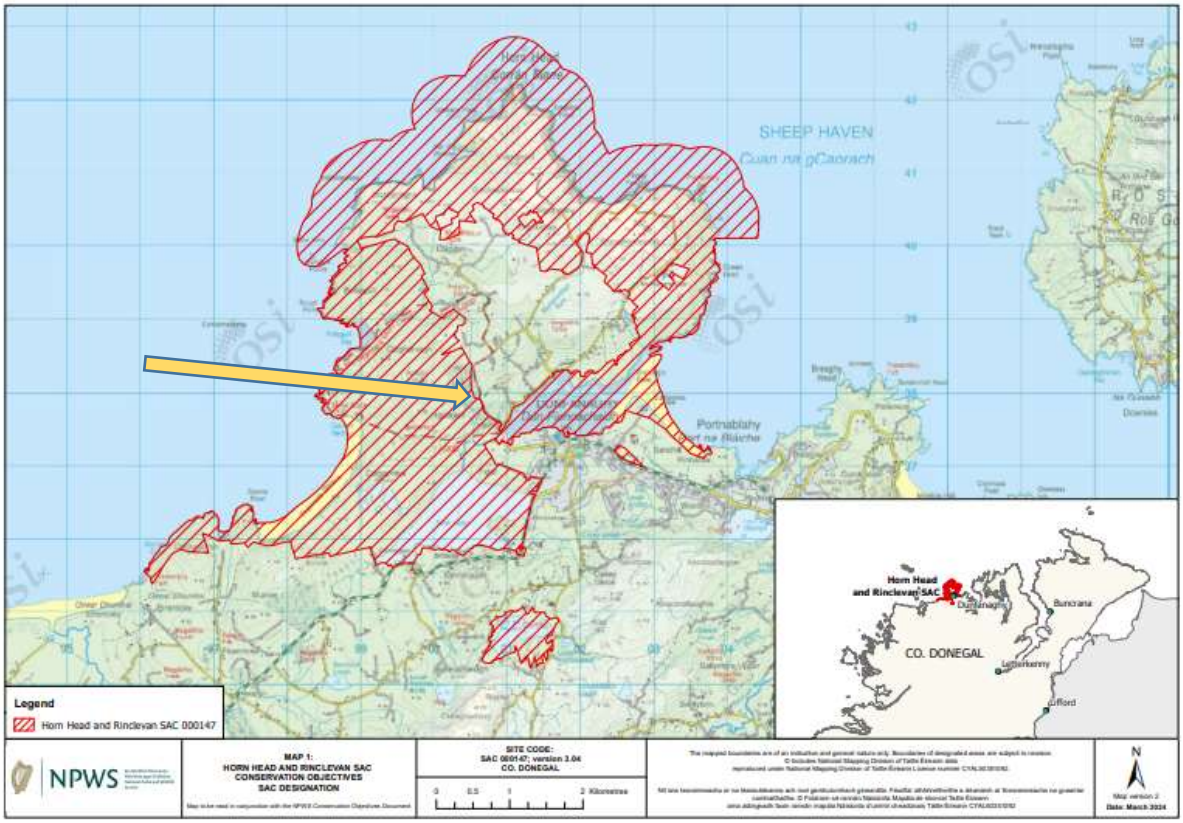

Figure 2 (below): Location and extent of Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Dunes with Salix repens ssp. argentea (Salicion arenariae) [2170], and; Humid dune slacks [2190], interacting with the proposed project location (yellow arrow) within Horn Head and Rinclevan SAC.

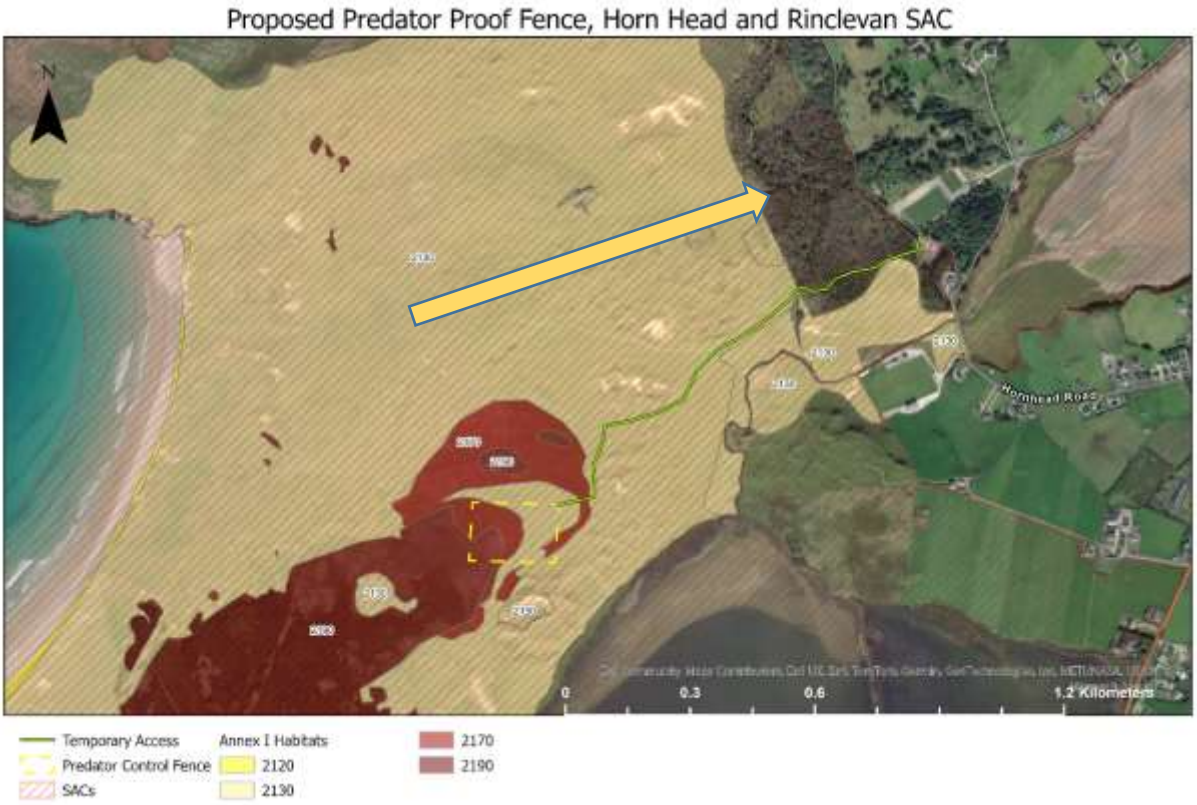

Figure 3 (below): Outline location (blue polygon) of proposed area for non-native conifer removal within Horn Head and Rinclevan SAC.

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