Ballyholme Yacht Club Watersports Centre

Shadow Habitats Regulations Assessment Report

POR-00884

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ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
SAC	Special Area of Conservation
SCI	Species of Conservation Interest
SPA	Special Protected Area
RAMSAR	Wetlands of International Importance
WeBS	Wetland Bird Survey

1 Introduction

Tetra Tech was commissioned by Ards & North Down Borough Council 'the applicant', to undertake a shadow Habitats Regulations Assessment (HRA) for a proposed project at the eastern shore of Ballyholme Bay at 13 Seacliff Road, Bangor BT20 5HU.

The Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended) provide for the protection of habitats and species of European importance through the designation of European sites as part of the UK national site network. European sites are defined as Special Areas of Conservation (SAC) or Special Protection Areas (SPA).

The Regulations also set out the requirement that any plan or project not directly connected with or necessary to the management of a European site and likely to have a significant effect on a European site (either alone or in combination with other plans or projects) will be subject to appropriate assessment of the implications for the European site in view of the site's conservation objectives.

HRA is the process that considers the implications of a plan or project, either individually or in combination with other plans and projects, on a European site. The following report will therefore assist the Competent Authority in fulfilling its duties in accordance with Regulation 43(1) of the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).

1.1 Habitats Regulations Assessment

HRA is the process that considers the implications of a plan or project (either individually or in combination with other plans and projects) on a European site. It consists of a staged approach (EC 2021) with each stage determining whether a further stage in the process is required.

- **Stage One: Screening** – The first part of the process ascertains whether a plan or project is directly connected with, or necessary to, the management of any European site, and, if this is not the case, whether it is likely to have a significant effect on any European site (either alone or in combination with other plans or projects) in view of the site's conservation objectives (COs).
- **Stage Two: Appropriate Assessment** – If likely significant effects cannot be excluded, the next stage of the process involves assessing the impact of the plan or project (either alone or in combination with other plans or projects) against the COs of the European site, to ascertain whether it will affect the integrity of the site, taking into account any mitigation measures. The Competent Authority then decides whether or not to approve the plan or project in light of the findings of the Appropriate Assessment.
- **Stage Three: Derogation** – Derogation only comes into effect if, despite a negative assessment, it is considered that the plan or project should still be carried out for Imperative Reasons of Overriding Public Interest (IROPI). This is only possible if there are no alternative solutions, the IROPI are duly justified, and if suitable compensatory measures are adopted to ensure that the overall coherence and protection of UK National Site Network.

2 Stage One: Screening

2.1 Introduction

The screening assessment examines the likely effects of the project, either alone or in combination with other projects or plans, upon European sites and considers whether it can be objectively concluded that the effects will not be significant. The screening assessment is carried out in the absence of any consideration of mitigation measures that form part of the project and are designed to avoid or reduce the impact of the project on a European site (EC 2002). Mitigation measures are defined as '*measures aimed at minimising or even cancelling the negative impact of a plan or project during or after its completion*' (EC 2000).

2.2 Management of the Site

Projects related to the conservation management of a European site are generally excluded from assessment (EC 2000). The proposed project is directly connected with or but is not necessary to the management of any European site and is therefore subject to assessment.

2.3 Description of the Project

2.3.1 Proposed Project

The proposed project involves redevelopment of the Club's existing premises into a Watersports Centre as part the transformative Bangor Waterfront Redevelopment Programme co-funded by the Council; Belfast Region City Deal and the Department for Communities. The location of the site and the red line boundary are illustrated in **Figure 1: Site Location.** Figure 1:

The proposals are being brought forward by Ards and North Down Borough Council. Ards and North Down Borough Council is progressing plans to redevelop a 2-mile stretch of the Bangor seafront over the next 10 years to help re-establish Bangor as a thriving city and prime visitor attraction in Northern Ireland.

The Bangor Waterfront Redevelopment Project is just one of a number of exciting tourism-led regeneration schemes that was eligible to seek funding though the Belfast Region City Deal.

The Belfast Region City Deal involves an integrated programme of investment that cuts across the responsibilities of local councils, the Northern Ireland Executive and UK Government. Council has secured £40M of funding via the Belfast Region City Deal, with £20M secured from Council and significant additional investment being sought from private investment for the waterfront redevelopment. The new Ballyholme Yacht Club Watersports Centre will benefit from this funding and is a key project under the Bangor Waterfront Redevelopment Programme.

The redevelopment of Ballyholme will provide Bangor, the Borough and the wider region, with a world class facility for watersports plus the ability to host more international events. The development of this facility will also be a huge boost for economic growth, attracting visitors from across the Island as well as from further afield.

At a local level, the addition of a new cafe, improved facilities, taster sessions and training courses are all designed to attract residents and their families to the Club to experience new opportunities. Visually, the new building will also enhance and improve the area.

Mix and type of development and other supporting facilities and amenities

The redevelopment will see the demolition and replacement of Ballyholme Yacht Club clubhouse and boathouse, along with the reconfiguration of boat parking, provision of landscaped courtyard and amenity space. The vehicular and pedestrian accesses will be relocated, while the Main slipway will be resurfaced and widened. The existing North Slipway will be closed and infilled to create a new hardstanding area. A rock armour revetment will be installed to the northern (full extent) and eastern wall (partial extent) of the North Boatyard, while the existing finger jetty will be demolished and a new wider, reinforced concrete jetty will be constructed.

Scale, Form and Design

The overall proposed building height is approximately 9.64m, the ground floor height is approximately 4.08m, and the first-floor height is approximately 3.97m, with the pitched roof adding approximately 1.59m. The building will be constructed using Board Mark Concrete, Curtain Walling, White / Grey Perforated Brick and timber cladding.

The existing yacht club is a mix of two-storey rooms (offices and lounge), single-storey function / galley rooms (Jubilee Room, changing rooms) and a separate rescue / training building. This results in an uneven appearance.

The proposed redevelopment would provide a more unified, contemporary single building massing with clear horizontal emphasis to relate to the seafront. From the seaside it is portrayed as a low to mid-height structure with large, glazed elevations facing Ballyholme Bay, terraces / slipway access at ground level, and an arrangement that separates public / café / social areas from training, plant and boat storage. The new massing is intended to read as a single, consistent waterfront building rather than multiple sections.

The proposed design places emphasis on large windows and glazed facades to maximise views across Ballyholme Bay and to provide visual connection between clubhouse activities and the water. The gross building area is a total of 1,610m^2 which is slightly bigger than the existing yacht club. Solar PV panels are proposed to be on the roof of the development which will add to the sustainability and low-energy measures that are a design priority.

Consultation

The Proposed Development was subject to a formal 'Pre-Application Discussion' (PAD) with Ards and North Down Borough Council (ANDBC) Planning Service (LA06/2026/1038/PAD). The purpose of the PAD was to discuss the project evolution, the terrestrial and marine works that are proposed and which documents will be submitted to ensure a front-loaded planning application.

As required by the Section 27 of the Planning Act (Northern Ireland) 2011, a PAN was also submitted to Ards and North Down Planning Service on 20th November 2025, ref. (LA06/2025/1039/PAN).

Summary of Pre-Application Community Consultation for LA06/2025/1039/PAN

The following activities was undertaken as part of the statutory 12-week minimum pre-application community consultation period. These include:

- Distribution of an information leaflet containing details of the proposals and the avenues through which recipients could provide their comments and feedback.
- Hosted public information events with members of the project team in attendance to facilitate the answering of questions and to allow for further feedback.
- Issued a press notice to highlight information about the proposals and provide notification of the digital public information events.
- Developed and managed a dedicated consultation website to host all proposal information digitally.

The PACC details the feedback received during the consultation period and the project team's response.

2.3.2 Zone of Influence

The Zone of Influence (ZoI) for a project is the area over which ecological features may be affected by biophysical changes as a result of a proposed project and its associated activities.

These include European sites located within the boundary of the project; European sites in immediate proximity to the boundary of the project; and European sites outside the boundary of the project that may be connected to the project through an identifiable impact pathway.

The proposed project is located within immediate proximity to Outer Ards SPA, Outer Ards RAMSAR and the proposed East Coast (NI) Marine SPA. It is hydrologically connected to Belfast Lough RAMSAR, North Channel SAC, Belfast Lough Open Water SPA, Belfast Lough SPA, Copeland Islands SPA, the Maidens SAC, Larne Lough SPA, Larne Lough RAMSAR, Strangford Lough SPA, Strangford Lough SAC and Strangford Lough RAMSAR. The European sites within the ZoI of the project and their qualifying interest features are listed below in **Table 1: European Sites and their Qualifying Interest Features.** The location of the proposed project in relation to these European sites is illustrated in **Figure 2: Site Location within European Designed Sites** and **Figure 3: European Designated Sites.**

Table 1: European Sites and their Qualifying Interest Features

Site Code	Site Name	Hydrological Distance from Site	Qualifying Interest Features	Progress to Screening	LSE Reason
UK9020271	Outer Ards SPA	0 km hydrologically within	• Arctic tern • Golden plover • Light-bellied brent goose • Ringed plover • Turnstone • Habitat extent • Roost site locations	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK12018	Outer Ards RAMSAR	0 km hydrologically within	• Arctic tern • Manx shearwater • Golden plover • Light-bellied brent goose • Ringed plover • Turnstone	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK9020320	Proposed East Coast (NI) Marine SPA	0.km hydrologically within	• Great crested grebe wintering population • Red-throated diver • Sandwich tern • Common tern • Arctic tern • Manx shearwater • Eider duck • Habitat extent • Locations of roosting / loafing sites	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK12002	Belfast Lough RAMSAR	1.4 km hydrological distance West	• Redshank	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling

Site Code	Site Name	Hydrological Distance from Site	Qualifying Interest Features	Progress to Screening	LSE Reason
					downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK0030399	North Channel SAC	3.9 km hydrological distance North-east	• Harbour porpoise	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK9020290	Belfast Lough Open Water SPA	5.4 km hydrological distance West	• Great crested grebe	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK9020101	Belfast Lough SPA	5.5 km hydrological distance West	• Redshank • Common tern • Arctic tern • Bar-tailed godwit • Black-tailed godwit	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities.

Site Code	Site Name	Hydrological Distance from Site	Qualifying Interest Features	Progress to Screening	LSE Reason
					Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK9020291	Copeland Islands SPA	6.8 km hydrological distance East	• Manx shearwater • Arctic tern	**YES**	The project is connected to the Belfast Lough Coast. Therefore, there is risk of sediment and / or contaminants from construction travelling downstream into the Belfast Lough and influencing surrounding plant communities. Qualifying bird species have potential to be impacted by noise and visual disturbances. Due to these potential impact pathways, LSE on Belfast Lough SPA cannot be ruled out preliminarily and have been discussed further below in **Stage Two: Appropriate Assessment.**
UK9020042	Larne Lough SPA	21.6 km hydrological distance North	• Sandwich tern • Roseate tern • Common tern • Light-bellied brent goose • Habitat extent • Roost site locations	**NO**	The project is connected to the Belfast Lough Coast. However, if sediment and / contaminants reached the Belfast Lough, the mixing of any polluting materials in the marine environment would heavily dilute down. Therefore, a reasonable pathway for likely sedimentation and / or contamination is not supported between the site and Larne Lough SPA.
UK12013	Larne Lough RAMSAR	21.6 km hydrological distance North	• Light-bellied brent goose • Roseate tern	**NO**	The project is connected to the Belfast Lough Coast. However, if sediment and / contaminants reached the Belfast Lough, the mixing of any polluting materials in the marine environment would heavily dilute down. Therefore, a reasonable pathway for likely sedimentation and / or contamination is not supported between the site and Larne Lough RAMSAR.
UK0030384	The Maidens SAC	23.1 km hydrological distance North	• Sandbanks which are slightly covered by sea water all the time • Reefs • Grey seals	**NO**	The project is connected to the Belfast Lough Coast. However, if sediment and / contaminants reached the Belfast Lough, the mixing of any polluting materials in the marine environment would heavily dilute down. Therefore, a

Site Code	Site Name	Hydrological Distance from Site	Qualifying Interest Features	Progress to Screening	LSE Reason
					reasonable pathway for likely sedimentation and / or contamination is not supported between the site and The Maidens SAC.
UK9020111	Strangford Lough SPA	39.5 km hydrological distance South	• Sandwich tern • Common tern • Arctic tern • Light-bellied brent goose • Bar-tailed godwit • Knot • Redshank • Shelduck • Overwintering wildfowl and waders	**NO**	The project is connected to the Belfast Lough Coast. However, if sediment and / contaminants reached the Belfast Lough, the mixing of any polluting materials in the marine environment would heavily dilute down. Therefore, a reasonable pathway for likely sedimentation and / or contamination is not supported between the site and Strangford Lough SPA.
UK0016618	Strangford Lough SAC	39.5 km hydrological distance South	• Coastal lagoons • Large shallow inlets and bays • Annual vegetation of drift lines • Atlantic salt meadows • Mudflats and sandflats not covered by seawater at low tide • Perennial vegetation of stony banks • Common seal • Reefs • *Salcornia* and other annuals colonising mud and sand	**NO**	The project is connected to the Belfast Lough Coast. However, if sediment and / contaminants reached the Belfast Lough, the mixing of any polluting materials in the marine environment would heavily dilute down. Therefore, a reasonable pathway for likely sedimentation and / or contamination is not supported between the site and Strangford Lough SAC.
UK12021	Strangford Lough RAMSAR	39.5 km hydrological distance South	• Sandwich tern • Common tern • Light-bellied brent goose • Knot • Redshank • Red knot	**NO**	The project is connected to the Belfast Lough Coast. However, if sediment and / contaminants reached the Belfast Lough, the mixing of any polluting materials in the marine environment would heavily dilute down. Therefore, a reasonable pathway for likely sedimentation and / or contamination is not supported between the site and Strangford Lough RAMSAR.

2.4 Outer Ards SPA and RAMSAR

2.4.1 Description of the Site

Outer Ards was confirmed a SPA and RAMSAR site in 2002 and 2005 respectively (Site Code UK902071 and UK12018 respectively) and is 4753.82 ha and 1154.16 ha in size respectively. The primary reason for designation is the presence of (1) Arctic tern; (2) wintering bird populations (Golden plover, Light-bellied brent goose, Ringed plover and Turnstone); (3) habitat extent; and (4) roost site locations.

2.4.2 Impact Prediction

2.4.2.1 Arctic tern breeding populations

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on Arctic tern and Manx shearwater breeding populations. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.4.2.2 Wintering bird populations

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on Golden plover, Light-bellied brent goose, Ringed plover and Turnstone wintering populations. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.4.2.3 Habitat extent

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the habitat extent of the Outer Ards SPA and Ramsar. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.4.2.4 Roost sites

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the roosting / loafing sites associated with the Outer Ards SPA and Ramsar. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.5 Proposed East Coast (NI) Marine SPA

2.5.1 Description of the Site

East Coast (NI) Marine SPA was proposed as a SPA in 2016 (Site Code UK9020320) and is 96668.34 ha in size. The primary reason for designation is the presence of (1) Great crested grebe wintering population; (2) breeding bird populations; (3) habitat extent; and (4) roosting / loafing sites.

2.5.2 Impact Prediction

2.5.2.1 Great crested grebe wintering population

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant

effects on great crested grebe wintering populations. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.5.2.2 Breeding bird populations

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on red-throated diver, sandwich tern, common tern, Arctic tern, manx shearwater and eider duck. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.5.2.3 Habitat extent

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the habitat extent of the East Coast (NI) Marine SPA. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.5.2.4 Roosting / loafing sites

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the roosting / loafing sites associated with the East Coast (NI) Marine SPA. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.6 Belfast Lough SPA and RAMSAR

2.6.1 Description of the Site

Belfast Lough was confirmed a SPA and RAMSAR site in 1998 (Site Code UK9020101 and 7UK117) and is 432.14 ha in size. The primary reason for designation is the presence of (1) Redshank and Great crested grebe wintering population; (2) habitat extent; and (3) roosting / loafing sites.

2.6.2 Impact Prediction

2.6.2.1 Redshank and Great crested grebe wintering population

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on redshank and great crested grebe wintering populations. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.6.2.2 Habitat extent

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the habitat extent of the Belfast Lough SPA and Ramsar site. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.6.2.3 Roosting / loafing sites

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely

significant effects on the roosting / loafing sites associated with the Belfast Lough SPA and Ramsar site. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.7 North Channel SAC

2.7.1 Description of the Site

North Channel SAC was confirmed a SAC in 2017 (Site Code UK0030399) and is 160367 ha in size. The primary reason for designation is the presence of (1) Harbour porpoise populations.

2.7.2 Impact Prediction

2.7.2.1 Harbour porpoise

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on Harbour porpoise populations. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.8 Belfast Lough Open Water SPA

2.8.1 Description of the Site

Belfast Lough Open Water SPA was confirmed a SPA in 2009 (Site Code UK9020290) and is 5592.99 ha in size. The primary reason for designation is the presence of (1) Great crested grebe wintering population; (2) habitat extent; and (3) roosting / loafing sites.

2.8.2 Impact Prediction

2.8.2.1 Great crested grebe wintering population

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on great crested grebe wintering populations. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.8.2.2 Habitat extent

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the habitat extent of the Belfast Lough Open Water SPA. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.8.2.3 Roosting / loafing sites

In the absence of appropriate mitigation measures to avoid or reduce sedimentation and / or contaminants associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on the roosting / loafing sites associated with the Belfast Lough Open Water SPA. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.9 Copeland Island SPA

2.9.1 Description of the Site

Copeland Island SPA was confirmed a SPA in 2009 (Site Code UK9020291) and is 201.15 ha in size. The primary reason for designation is the presence of (1) Arctic tern and Manx shearwater; and (2) habitat extent.

2.9.2 Impact Prediction

2.9.2.1 Arctic tern and Manx shearwater breeding populations

In the absence of appropriate mitigation measures to avoid or reduce visual and noise disturbance associated with the proposed project there is insufficient evidence to conclude that there will not be any likely significant effects on Arctic tern breeding populations for foraging. It is therefore necessary to **proceed to Stage 2 Appropriate Assessment**.

2.9.2.2 Habitat Extent

There will be no loss of or disturbance to the habitat extent of Copeland Island SPA as a result of the proposed project as it does not occur within the red line boundary of the project with tidal mixing to reduce any risk from sedimentation and / or contamination to insignificant levels. The habitat extent has therefore been removed from any further assessment.

2.10 Larne Lough SPA and RAMSAR

2.10.1 Description of the Site

Larne Lough was confirmed a SPA and Ramsar site in 2015 and 1997 respectively (Site Code UK9020221 and UK002004 respectively) and is 398 ha in size. The primary reason for designation is the presence of (1) breeding bird populations; (2) Light-bellied brent goose wintering populations; (3) habitat extent; and (4) roost site locations.

2.10.2 Impact Prediction

2.10.2.1 Breeding bird populations

There will be no loss of or disturbance to habitats or populations of Sandwich tern, Roseate tern and / or Common tern as a result of the proposed project as it does not occur within the red line boundary of the project and is a significant distance away. Sandwich tern, Roseate tern and Common tern associated with the Larne Lough SPA and Ramsar site have therefore been removed from any further assessment.

2.10.2.2 Light-bellied brent goose wintering population

There will be no loss of or disturbance to habitats or populations of Light-bellied brent goose as a result of the proposed project as it does not occur within the red line boundary of the project and is a significant distance away. Light-bellied brent goose associated with the Larne Lough SPA and RAMSAR site have therefore been removed from any further assessment.

2.10.2.3 Habitat Extent

There will be no loss of or disturbance to the habitat extent of Larne Lough SPA and RAMSAR site as a result of the proposed project as it does not occur within the red line boundary of the project with tidal mixing to

reduce any risk from sedimentation and / or contamination to insignificant levels. The habitat extent has therefore been removed from any further assessment.

2.10.2.4 Roost sites

There will be no loss of or disturbance to the high tide roost sites of Larne Lough SPA and RAMSAR site as a result of the proposed project as it does not occur within the red line boundary of the project with tidal mixing to reduce any risk from sedimentation and / or contamination to insignificant levels. The roost sites have therefore been removed from any further assessment.

2.11 The Maidens SAC

2.11.1 Description of the Site

The Maidens SAC was confirmed a SAC in 2016 (Site Code UK0030384) and is 7461.36 ha in size. The primary reason for designation is the presence of (1) reef and partially submerged sandbank habitats; (2) Grey and Common seal populations; and (3) Harbour porpoise populations.

2.11.2 Impact Prediction

2.11.2.1 Reef and sandbank habitats

There will be no loss of or disturbance to the reef and sandbanks of The Maidens SAC as a result of the proposed project as it does not occur within the red line boundary of the project with tidal mixing to reduce any risk from sedimentation and / or contamination to insignificant levels. The reef and sandbank habitats have therefore been removed from any further assessment.

2.11.2.2 Grey and Common seal and Harbour porpoise

There will be no loss of or disturbance to habitats or populations of Grey and / or Common seal and Harbour porpoises as a result of the proposed project as it does not occur within the red line boundary of the project and is a significant distance away. These mammals associated with The Maidens SAC have therefore been removed from any further assessment.

2.12 Strangford Lough SPA, SAC and Ramsar

2.12.1 Description of the Site

Strangford Lough was confirmed a SPA, SAC and Ramsar site in 2015, 2017 and 1997 respectively (Site Code UK9020111, UK0016618 and 7UK116 respectively) and is 15580 ha, 15398.54 ha and 15580 ha in size respectively. The primary reason for designation is the presence of (1) breeding bird populations (including Sandwich tern, Common tern, Arctic tern, Golden plover, Bar-tailed godwit, Light-bellied brent goose, Shelduck, Knot, Redshank, Great crested grebe, Cormorant, Greylag goose, Wigeon, Gadwall, Teal, Mallard, Pintail, Shoveler, Goldeneye, Red-breasted merganser, Coot, Oystercatcher, Ringed plover, Grey plover, Lapwing, Dunlin, Curlew and Turnstone); (2) waterfowl assemblage wintering population (including Golden plover, Bar-tailed godwit, Light-bellied brent goose, Shelduck, Knot, Redshank, Great crested grebe, Cormorant, Greylag goose, Wigeon, Gadwall, Teal, Mallard, Pintail, Shoveler, Goldeneye, Red-breasted merganser, Coot, Oystercatcher, Ringed plover, Grey plover, Lapwing, Dunlin, Curlew and Turnstone); (3) habitat extent (including large shallow inlet and bay, coastal lagoons, mudflats and sandflats not covered by sea water at low tide, reefs, annual vegetation of drift lines, Atlantic salt meadows, perennial vegetation of stony banks, and *Salicornia* and other annuals colonising mud and sand); (4) roost site locations; and (5) Harbour seal.

2.12.2 Impact Prediction

2.12.2.1 Breeding bird populations

There will be no loss of or disturbance to habitats or populations of breeding birds as a result of the proposed project as it does not occur within the red line boundary of the project and is a significant distance away. Sandwich tern, roseate tern and common tern associated with the Strangford SPA, SAC and Ramsar site have therefore been removed from any further assessment.

2.12.2.2 Waterfowl assemblage wintering population

There will be no loss of or disturbance to habitats or populations of the waterfowl assemblage as a result of the proposed project as it does not occur within the red line boundary of the project and is a significant distance away. The waterfowl assemblage wintering population associated with the Strangford Lough SPA, SAC and Ramsar site have therefore been removed from any further assessment.

2.12.2.3 Habitat extent

There will be no loss of or disturbance to the habitat extent of Strangford Lough SPA, SAC and Ramsar site as a result of the proposed project as it does not occur within the red line boundary of the project with tidal mixing to reduce any risk from sedimentation and / or contamination to insignificant levels. The habitat extent has therefore been removed from any further assessment.

2.12.2.4 Roost sites

There will be no loss of or disturbance to the high tide roost sites of Strangford Lough SPA, SAC and Ramsar site as a result of the proposed project as it does not occur within the red line boundary of the project with tidal mixing to reduce any risk from sedimentation and / or contamination to insignificant levels. The roost sites have therefore been removed from any further assessment.

2.13 In-Combination with Other Projects

2.13.1 Other Projects Considered for In-combination Effects

Article 6(3) of the Habitats Directive requires that in-combination effects with other plans or projects are considered. On this basis, a range of other project as listed inError! Reference source not found. were considered in terms of their potential to have an in-combination effect with the proposal for the rebuild of Ballyholme Yacht Club.

Table 2: Other Projects Considered for In-combination Effects

Location	Planning Ref.	Proposal	Application Status	Distance from Site
Ballyholme Yacht Club, North Boat Park, 13 Seacliff Road, Bangor	LA06/2024/0540/F	Pre-fabricated "Pod" for use as a "Yacht Race Administration Hub" for race management at Ballyholme Yacht Club for temporary permission for 5 years (Amended description).	Determined	0 km
274 Seacliff Road, Bangor, BT20 5HS	LA06/2025/0332/F	2 storey front, rear and side extensions with 2 Juliet balconies to front. Alterations to access. (Amended Plans)	Determined	0.14 km south
Cairn Bay Lodge, 278 Seacliff Road, Bangor, BT20 5HS	LA06/2021/1308/F	Canopy to external dining area on front terrace (pergola structure supporting a retractable awning cover)	Determined	0.19 km south west
184 Seacliff Road, Bangor, BT20 5HA	LA06/2024/0451/F	Demolition of rear return and part demolition of front elevation. Erection of three storey and two storey extensions to rear, raised deck to rear, front dormer and first floor front balcony. (Amended plans).	Determined	0.32 km north west
40 Seacliff Road, Bangor, BT20 5EY	LA06/2022/1304/F	Rear store replacement with two storey ancillary extension over, two storey rear staircase landing link extension: replacement front dormer window, dormer window on rear elevation.	Determined	0.80 km west

2.13.2 Existing Threats and Pressures

There are currently a number of impacts occurring on the Belfast Lough European sites that have an influence on its conservation and management and are relevant to the proposed project including, but not limited to: aquaculture, boating shipping activity (commercial and / or recreation), dredging, fishing (commercial and / or recreation), expansion of commercial port facilities, diminution of water quality (including introduction of invasives), introduced species, marine renewable energy developments, recreation activities, changes in system dynamics, loss of inter-tidal habitat, inappropriate development or change of use, changes to adjoining habitat, bait digging, shellfish gathering, coastal protection schemes, research activities, wildfowling, livestock farming, mowing / cutting, use of biocides, hormones and chemicals, forest planting on open ground, forest exploitation, mining and quarrying, exploration and extraction of oil and / or gas, roads, paths and railroads, utility and service lines, shopping lanes, ports, marine construction, urbanisation, taking and removal of terrestrial plants, military use and civil unrest, air pollution, problematic native species, landslides and storms.

In the absence of appropriate mitigation measures to avoid and / or reduce sedimentation and contaminant runoff, and visual and noise disturbance to breeding and wintering bird populations and marine mammals from the proposed project, there is insufficient evidence to conclude that there will not be any likely significant effects on Outer Ards SPA, Outer Ards RAMSAR, proposed East Coast (NI) Marine SPA, Belfast Lough Open Water SPA, Belfast Lough SPA, Belfast Lough RAMSAR, North Channel SAC, and Copeland Islands SPA. It is therefore necessary to proceed to Stage 2 Appropriate Assessment.

2.13.3 Assessment of Significance

Outer Ards SPA, Outer Ards RAMSAR, proposed East Coast (NI) Marine SPA, Belfast Lough Open Water SPA, Belfast Lough SPA, Belfast Lough RAMSAR, North Channel SAC, and Copeland Islands SPA are considered within the Zone of Influenced (ZoI) of the proposed project. Stage One Screening concludes likely significant effects on these European sites in relation to sedimentation and contaminant runoff, and visual and noise disturbance to breeding and wintering bird populations and marine mammals in the absence of mitigation measures and therefore the project must be subject to Stage Two Appropriate Assessment.

3 Stage Two: Appropriate Assessment

3.1 Introduction

Appropriate Assessment considers the impact of the project (either alone or combination with other projects or plans) on the integrity of a European site with respect to the conservation objectives of the site and to its structure and function. Integrity of the site is defined as '*the coherence of the site's ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is… classified*' (EC 2000).

3.2 European Sites Conservation Objectives

Stage One Screening concluded likely significant effects on Outer Ards SPA, Outer Ards RAMSAR, proposed East Coast (NI) Marine SPA, Belfast Lough Open Water SPA, Belfast Lough SPA, Belfast Lough RAMSAR, North Channel SAC, and Copeland Islands SPA. The following sets out the conservation objectives for the qualifying interest features for which there is insufficient evidence to conclude that there will not be any likely significant effects.

3.2.1 Outer Ards SPA and RAMSAR

3.2.1.1 Arctic Tern breeding population

- Fledging success sufficient to maintain or enhance population.
- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution of the species within site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.1.2 Wintering bird populations

- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution of the species within site
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.1.3 Habitat extent

- To maintain or enhance the area of natural and semi-natural habitats used or potentially usable by feature bird species, subject to natural processes.

3.2.1.4 Roost sites

- Maintain or enhance sites utilised as roosts.

3.2.2 Proposed East Coast (NI) Marine SPA

3.2.2.1 Great crested grebe wintering population

- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.

- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.2.2 Breeding bird populations

- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.2.3 Habitat extent

- Maintain the extent of main habitat components subject to natural processes.

3.2.2.4 Roost / Loafing Sites

- Maintain all locations of sites.

3.2.3 Belfast Lough SPA and Ramsar

3.2.3.1 Redshank and Great crested grebe wintering population

- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.3.2 Habitat Extent

- To maintain or enhance the area of natural and semi-natural habitats used or potentially usable by feature bird species, subject to natural processes.
- Maintain the extent of main habitat components subject to natural process.

3.2.3.3 Roost Sites

- Maintain or enhance sites utilised as roosts.

3.2.4 North Channel SAC

3.2.4.1 Harbour porpoise

- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.5 Belfast Lough Open Water SPA

3.2.5.1 Great crested grebe wintering population

- To maintain or enhance the population of the qualifying species.
- To maintain or enhance the range of habitats utilised by the qualifying species.
- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.2.5.2 Habitat extent

- Maintain the extent of main habitat components subject to natural processes.

3.2.5.3 Roost / loafing Sites

- Maintain all locations of sites.

3.2.6 Copeland Islands SPA

3.2.6.1 Arctic tern and Manx shearwater breeding population

- To maintain or enhance the population of the qualifying species.
- Fledgling success sufficient to maintain or enhance population.
- To maintain or enhance the range of habitats utilised by the qualifying species.

- To ensure that the integrity of the site is maintained.
- To ensure there is no significant disturbance of the species.
- To ensure that the following are maintained in the long term:
    - Population of the species as a viable component of the site.
    - Distribution of the species within site.
    - Distribution and extent of habitats supporting the species.
    - Structure, function and supporting processes of habitats supporting the species.

3.3 Impact Prediction

The proposed project has been identified as having the potential for likely significant effects in relation to sedimentation and contaminant runoff, and visual and noise disturbance to breeding and wintering bird populations and marine mammals which could give rise to adverse impacts upon Outer Ards SPA and RAMSAR site, proposed East Coast (NI) Marine SPA, Belfast Lough SPA and RAMSAR site, North Channel SAC, Belfast Lough Open Water SPA and Copeland Islands SPA with respect to the conservation objectives in the absence of mitigation measures both alone and in-combination with other plans and projects.

3.3.1 Visual and Noise Disturbance

The findings of overwintering bird surveys undertaken at the site, as detailed within the Overwintering Ornithological Report from 2025 - 2026 (at Appendix A) indicate that the site itself and areas of adjacent and nearby shoreline habitat and marine waters are a significant winter roosting habitat for Ringed plover and Turnstone, both SPA species of Outer Ards SPA. The roosting population of Ringed plover accounts for 21.5% of the Outer Ards SPA population and 65.7% of the 5-year Belfast Lough WeBS population, exceeding the all-Ireland importance threshold. Similarly, the Turnstone population accounts for 12.2% of the Outer Ards SPA population and 36.0% of the 5-year Belfast Lough WeBS population, exceeding the all-Ireland importance threshold.

Although such species are relatively mobile and have access to a large area of marine habitat throughout much of Belfast Lough and the surrounding coastline, it is considered that the construction phase of the proposed development has potential to give rise to adverse aerial noise or visual disturbance effects upon the SCIs of the Outer Ards SPA.

In relation to the proposed East Coast (NI) Marine SPA, the development site supports a lower percentage (2.0%) of the wintering population of Eider, a feature species, accounting for 2% of the 5-year WeBS population, however this species is highly mobile and migratory with access to a large area of marine habitat, and as such it is not considered that the proposed development will lead to any adverse aerial noise or visual disturbance, during construction, to this species.

The site of proposed redevelopment lies within relative proximity of a number of further SPAs and RAMSAR sites namely:

- Belfast Lough RAMSAR site which lies 1.4 km from the site (straight line distance) of proposed development;
- Belfast Lough Open Water SPA which lies 5.4 km from the Site (straight line distance) of proposed development; and
- Belfast Lough SPA which lies 5.5 km from the Site (straight line distance) of proposed development; and
- Copeland Islands SPA which lies 6.8 km from the Site (straight line distance) of proposed redevelopment

These sites are all separated from the site of proposed redevelopment by at least 1.4 km of marine waters and as such it is not considered that the proposed development will lead to any adverse aerial noise or visual disturbance, during construction, to any feature species of these European sites.

Each of these sites is designated on account of waterbird species which are likely to utilise marine habitats within Belfast Lough and in close proximity to the site of proposed development as supporting habitat for purposes such as foraging and roosting however, these mobile and migratory species also have access to large areas of similar habitats in the locality. As such it is not considered that construction works proposed, will have any potential to give rise to an adverse effect upon the above listed SPA and RAMSAR sites and their qualifying interest features.

The same conclusions are reached in respect of further spatially separated sites including Larne Lough SPA and RAMSAR and Strangford Lough SPA and RAMSAR.

North Channel SAC lies 3.9 km to the North-east (hydrological distance) of the site of proposed development at its closest point. This site is designated on account of the supported population of harbour porpoise. Given that this species is a marine mammal, with access to a large area of marine habitat, it is not considered that the proposed upper or lower site works associated with the proposed terrestrial project have potential to give rise to any adverse aerial noise and visual disturbance effect upon harbour porpoise.

In addition to proposed construction works, due to the nature of the proposal, no adverse operational phase impact regarding visual and noise disturbance is predicted.

On this basis it is considered that there is potential for significant aerial noise and visual disturbance effects, leading to disturbance and displacement of bird populations within the Outer Ards SPA and RAMSAR site and the proposed East Coast (NI) Marine SPA that could jeopardise or imperil the achievement of the conservation objectives of the sites concerned. Mitigation measures are required to prevent adverse effects on the integrity of these sites.

3.3.2 Sedimentation and Contaminant Runoff

The proposed development will involve works to the terrestrial environment for the reconstruction of existing finger jetty and main slipway, closure and infilling of the existing north slipway, construction of building foundations, the creation of new rock armour and surfacing and drainage. The working areas are hydrologically linked to the marine waters of Belfast lough and a number of European Sites, as set out within **Table 1.**

Such works will involve the use of plant, machinery and associated petrochemical fuels, lubricating oils and other chemicals during construction works, in close proximity to the marine environment. In addition to the use of petrochemical fuels and other chemicals within the construction phase the proposals will also involve the use of quantities of cement and concrete in the construction phase. Should such highly alkaline substances enter the marine environment there is potential for impacts associated with environmental toxicity and other effects. The use of such substances introduces the potential for the accidental release of these pollutants into the marine environment and subsequently into any hydrologically linked European Sites.

Additionally, throughout the site, large scale earthworks are proposed within direct proximity of the coastal environment (including demolition and removal of existing infrastructure and construction of foundations and bunds). Such works have potential to give rise to the accidental release of sediments into the adjacent marine waters. Should such substances enter the marine environment there is potential for adverse effects through water quality and habitat deterioration effects, including impacts upon prey biomass for both SPA feature birds and SAC feature marine mammals, and environmental toxicity. While such potential inputs are likely to be subject to significant dilution within marine waters, in the absence of mitigation measures to prevent accidental pollution, sedimentation or contaminant runoff could jeopardise or imperil the achievement of the conservation objectives of these sites. Mitigation measures are required to prevent adverse effects on the integrity of:

- Outer Ards SPA and RAMSAR,
- Proposed East coast (NI) marine SPA,
- Belfast Lough SPA and RAMSAR, and
- Belfast Lough Open Water SPA.

Any elevated concentrations of pollutants arising at construction phase at the site of the proposed development would decrease in the water column of the open sea over time and with distance and across the normal tidal

cycle as concentrations of pollutants disperse and dilute to background levels. Mobilised pollutants cannot remain in a concentrated plume across 5+ km of dispersion through the currents and wave action and across the tidal cycles experienced before reaching the more distant European sites. All further European sites are considered to be sufficiently separated from the proposals to ensure that any potential inputs would be highly likely to be dispersed and diluted to background levels, given the lengths of the associated hydrological pathways.

3.4 Mitigation Measures

All activities at construction stage will be undertaken in line with a finalised CEMP to be developed from the outline CEMP by the successful contractor and submitted for approval in advance of the commencement of construction as part of discharge of planning and marine licensing conditions. The CEMP will include for a range of measures to mitigate adverse effects on European sites.

3.4.1 Ornithological Mitigation

The main issue is the potential for disturbance to roosting or feeding Ringed plover and Turnstone, both feature species of Outer Ards SPA, during the overwintering (non-breeding) season. Disturbance to both species is likely to come from noise and visual disturbance, due to rock-breaking and excavation of the existing seabed for revetment construction, partial demolition of the existing jetty and slipway for reconstruction and partial demolition and construction of building foundations.

A small portion of the originally designed main slipway would have resulted in the removal of a rocky outcrop which the Ringed plover and Turnstone were observed using as a roost site. The design was amended to remove this corner of the slipway to prevent the loss of the rocky outcrop feature, as shown in Figure 4.

A Construction Method Statement accompanies the marine construction licence application and sets out the proposed works in further detail.

The timetable for the construction works is scheduled to commence in May 2027 with overall completion scheduled for May 2029.

This proposed schedule will not avoid the key period when non-breeding shorebirds are present at the Outer Ards SPA and RAMSAR site. Non-breeding Ringed plover and Turnstone start to arrive on the shores of Belfast Lough in late Autumn, the peak numbers of both species in the most recent survey report (winter 2025-2026) have occurred in mid-winter.

A seasonal restriction is required for marine works in the area where the bird species occur. Marine works are to be undertaken between March and August (inclusive) and are not permitted to be undertaken between September and February (inclusive). If marine construction works are undertaken only in the breeding season, adverse effects on the integrity of the sites concerned will not occur because the feature species are not present and cannot be affected.

3.4.2 Pollution Prevention Guidelines

Pollution Prevention Guidelines (PPGs) and Guidance for Pollution Prevention (GPP) are a series of documents developed by Natural Resources Wales (NRW), the Northern Ireland Environment Agency (NIEA) and the Scottish Environment Protection Agency (SEPA). The DAERA Planning and Environment section has published Pollution Prevention Guidance 4, “Standing Advice for Planners and Applicants Seeking Planning Permission for Developments which may Impact upon the Water Environment” (DAERA, 2017). This highlights the need for the developer and contractor to apply good practice in relation to pollution prevention and to adhere to the guidance contained within the relevant PPGs and GPPs. They provide useful information on good practice and DAERA recommend they are used as a source of information and good practice.

Mitigation and control measures to address the potential for pollution associated with construction activities will follow good work practices and sound design principles, best practice and relevant guidelines including the following current series of guidance documents:

- GPP 1: Understanding your environmental responsibilities - good environmental practices;
- GPP 2: Above ground oil storage tanks;
- GPP 3: Use and design of Oil Separators in Surface Water Drainage Systems;
- GPP 5: Works and maintenance in or near water;
- GPP 6: Working at construction and demolition sites;
- GPP 7: Refuelling facilities;
- GPP 8: Safe storage and disposal of used oils;
- GPP 13: Vehicle washing and cleaning;
- GPP 20: Dewatering Underground Ducts and Chambers;
- GPP 21: Pollution incident response planning;
- GPP 22: Dealing with spills
- GPP 26: Storage and handling of drums & intermediate bulk containers.

Within these guidance documents a range of measures are applicable. Those relating specifically to the issues raised are highlighted in this statement. In addition, guidelines provided by CIRIA "Control of Water Pollution from Construction Sites – Guide to Good Practice" will also be applied.

Mitigation measures will be implemented by the contractor and will include the requirements for best practice and adherence to the necessary recognised guidance as outlined above. The mitigation strategy developed in the outline Construction Environmental Management Plan will form the basis of the contractor's final Construction Environmental Management Plan (CEMP).

3.4.3 Sedimentation and Containment Runoff

Preventing run-off is an effective method of preventing sediment pollution in the water environment. The adoption of appropriate sediment controls during construction is essential to prevent sediment pollution. The contractor will ensure that mitigation measures are carried out in accordance with the Construction Environmental Management Plan (CEMP). Treatment facilities for contaminated water, such as sediment traps and settlement lagoons will be used appropriately, prior to discharge. Any discharge from the construction site to water bodies during the construction phase, e.g. from these treatment faculties, will require a temporary discharge consent under the Water (Northern Ireland) Order 1999. The mitigation measures are to include:

- A clearly defined Soil Resource Plan implemented to sustainably utilise the soil materials;
- The location of stockpile storage areas will be carefully chosen, clearly identified and planned to ensure the best location to reduce material movements and minimal possibility of erosion, flooding and cross contamination;
- Protection of stockpiles from rain, contamination and erosion;
- Soil handling and storage information;
- Stockpile height, in line with soil consistency and moisture content;
- Locate stockpiles out of the wind or provide wind breaks to minimise dust generation;
- Keep stockpiles to minimum practicable height and use gentle slopes;
- Minimise the storage time of materials on site;

- Store materials away from the site boundary;
- Minimise the height of fall of all materials;
- Avoid spillage, and clean any spill up as soon as possible;
- Good soil handling and storage methods including protection of stockpiles with geotextiles;
- Minimising the amount of time stripped ground and soil stockpiles are exposed;
- Only removing the vegetation from the area that needs to be exposed in the near future;
- Using geotextile silt fencing at the toe of any slopes and around the perimeter of the site, to reduce the movement of silt; this should be installed before soil stripping has begun and vehicles start tracking over the site;
- Divert clean water away from the area of construction work in order to minimise the volume of contaminated water;
- Brushing or scraping roads to reduce dust and mud deposits, appropriately disposing of material collected and;
- Putting small dams or silt fencing in artificial roadside ditches to retain silt.
- Spill kits will be located within working areas at all times. All spills will be cleaned up and will be packaged in sealed bags or containers and disposed off-site in a landfill.

In circumstances where the above mitigation measures are employed during construction operations, the potential impact to receiving water environment will be reduced to negligible thus reducing the significance of environmental impact will be reduced to minor on a temporary basis, i.e. for the duration of the works.

3.4.4 Concrete, Cement and Grout Pollution

The impacts in relation to cement and concrete for the project are, for the most part (but not limited to) the installation of the concrete areas, bunding (to be poured in-situ) and construction works of buildings. Mitigation measures to prevent cement contamination of water bodies will be carried out in accordance with the outlined recommendations within the oCEMP. These measures shall include concrete washout from concrete lorries, on-site batching, concrete placement and concrete wash water treatment. The oCEMP refers to the following mitigation measures:

- A risk assessment will be carried out to ensure the best location for concrete washout facilities for plant required on site;
- On site batching locations will be determined to choose the appropriate locations to allow for adequate protection of watercourses and drains during mixing activities, spillage, and storage of cement materials. Washout from mixing works will be undertaken in a contained impermeable area;
- Concrete placement and routes throughout the site will be arranged prior to deliveries with suppliers before works begin, as well as wash out areas, emergency procedures and contingency plans;
- Effluent from wheel wash and plant washing facilities will be contained in a holding tank with an impermeable sheet for efficient treatment and disposal. A concrete washout risk assessment will be completed to assess the risk to receptors based upon site location and volume of concrete generated from washout.
- Ensure that concrete pours are contained within the working area and do not enter any watercourses or surface water drains;
- When mixing grout on site, construct a suitable barrier around mixing areas, supply lines and around working areas to prevent its escape;
- Trucks, hoppers, mixers and concrete pumps that have contained concrete must be washed out in a contained area;

- All concrete pours will be carried out under supervision;
- Pours will be properly prepared to avoid run off (shuttering, mud matts, membranes used) and waste;
- Pouring of concrete should not take place when heavy rain is imminent;
- Be sited on an impermeable designated area at least 10 m from any watercourse, surface drain, rock outcrop or karstic sinkhole
- Have settlement and re-circulation systems for water reuse, to minimise the risk of pollution and reduce water usage
- Have a contained area for washing out and cleaning of concrete batching plant or ready mix lorries;
- Collect wash waters that cannot be reused and, where necessary, discharge to the foul sewer, or contain wash water for authorised disposal off site

In circumstances where the above mitigation measures are employed during construction operations, the potential impact to receiving water environment will be reduced to negligible thus reducing the significance of environmental effect will be reduced to minor on a temporary basis, i.e. for the duration of the works.

3.4.5 General Construction Works

The risk of water quality impacts associated with works machinery, infrastructure and on-land operations (for example leakages / spillages of fuels, oils, other chemicals and wastewater) will be controlled through good site management and the adherence to codes and practices (as outlined above) which limit the risk to within acceptable levels.

This will be carried out in accordance with the oCEMP and include aspects such as oil storage locations, oil storage tanks and containment systems, inspection and maintenance, control measures for refuelling and appointed persons for refuelling.

In circumstances where the above mitigation measures are employed during construction operations, the potential impact to receiving water environment will be reduced to negligible thus reducing the significance of environmental effect will be reduced to minor on a temporary basis.

4 Conclusion

Screening has been completed to identify the likely significant effects of a proposed project at Ballyholme Yacht Club on Outer Ards SPA and RAMSAR site, the proposed East Coast (NI) Marine SPA, Belfast Lough SPA and RAMSAR site, North Channel SAC, Belfast Lough Open Water SPA and Copeland Islands SPA. The appraisal concluded that likely significant effects on these European sites could not be excluded at the screening stage, in relation to sedimentation and / or contamination runoff and visual and noise disturbance, in the absence of mitigation measures and it was therefore necessary to undertake an appraisal for Appropriate Assessment.

An appraisal for Appropriate Assessment has been completed and concludes that the proposed project is directly connected with or but not necessary to the management of any European site; and will not give rise to adverse effects on the integrity of any European site with implementation of mitigation measures including pollution prevention measures as set out in the CEMP and scheduling of marine construction works to the period March-August (inclusive).

There will be no significant in-combination effects with the other plans or projects.

It can be objectively concluded with supporting evidence that there will be no adverse effects on the integrity of any European site.

5 References

European Commission (2000) *Managing Natura 2000 Sites, The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*, Office of the Official Publications of the European Communities, Luxembourg.

European Commission (2002) *Assessment of plans & projects significantly affecting European sites, Methodological guidance on the provisions of Article6 (3) & (4) of the Habitats Directive 92/43/EEC*, Office of the Official Publications of the European Communities, Luxembourg.

European Commission (2021) Commission Notice, *Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, *C(2021) 6913, 28.9.2021*, Brussels.

DAERA (2021) *Northern Ireland Marine Map Viewer*, [online] Available at: https://gis.daera-ni.gov.uk/arcgis/apps/webappviewer/index.html?id=e44a8e27333241bfa2faf4a387fd99d7 [Accessed 28/04/21].

FIGURES

LIST OF FIGURES

Figure 1: Site Location

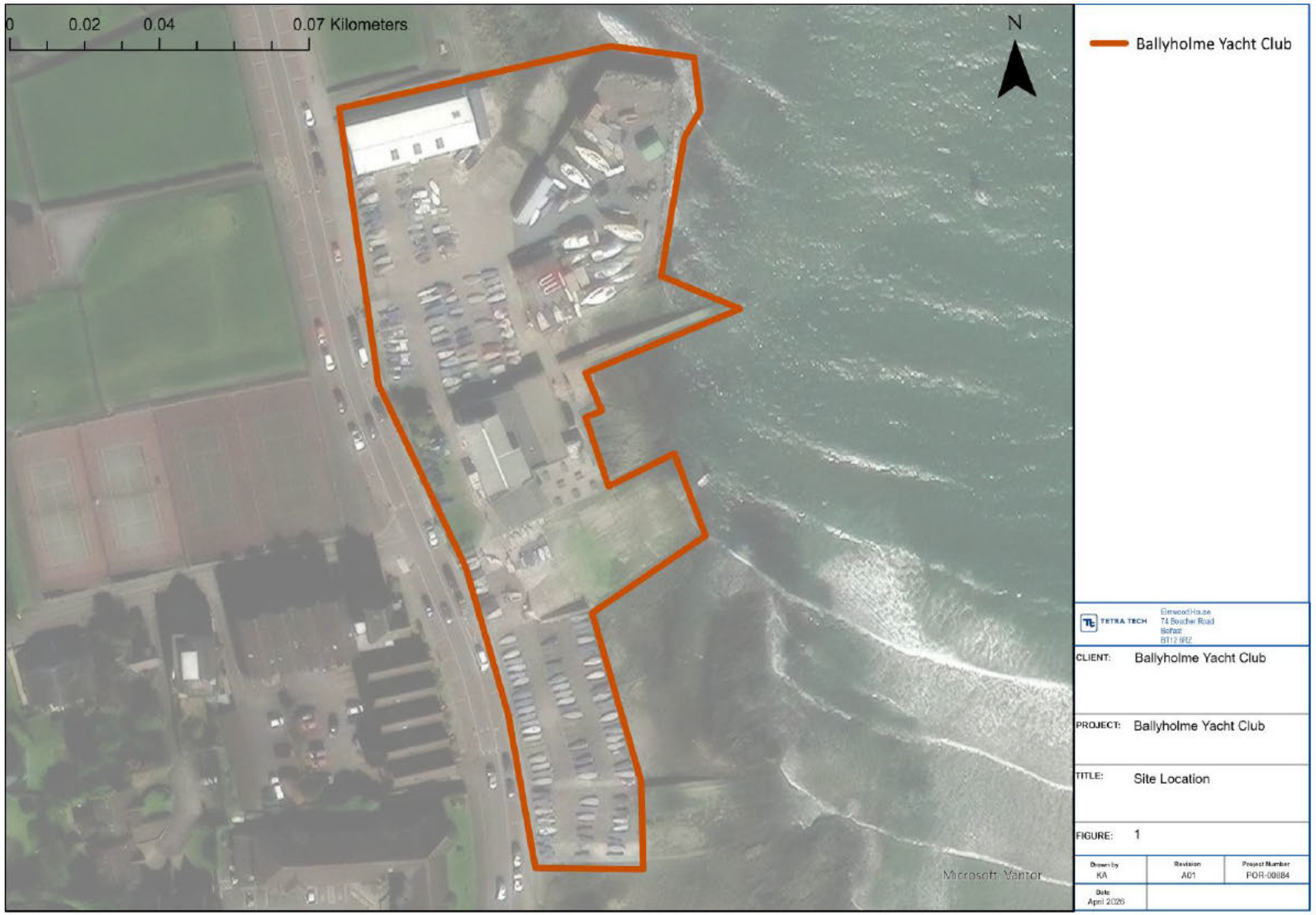


Figure 2: Site Location within European Designed Sites

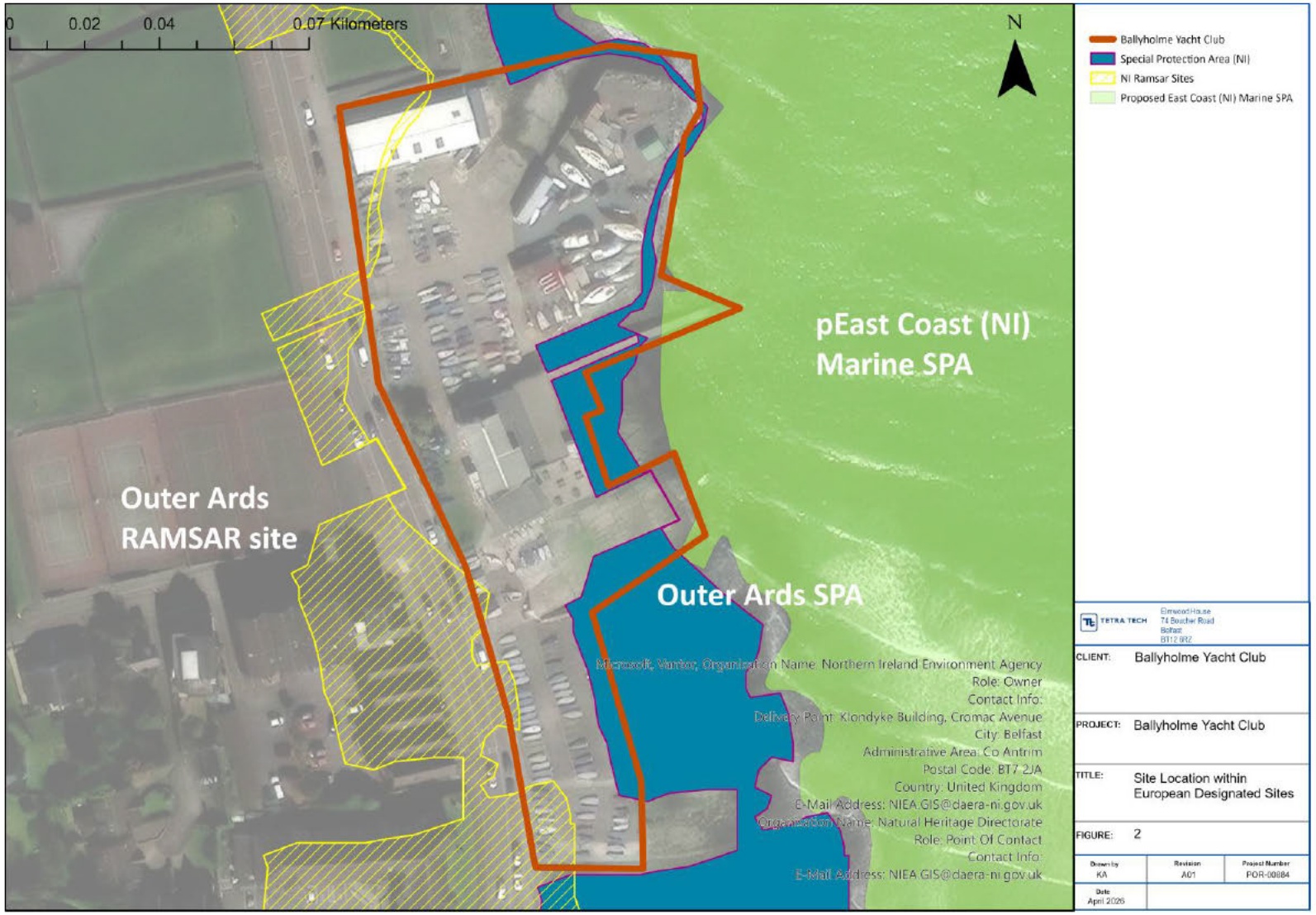


Figure 3: European Designated Sites

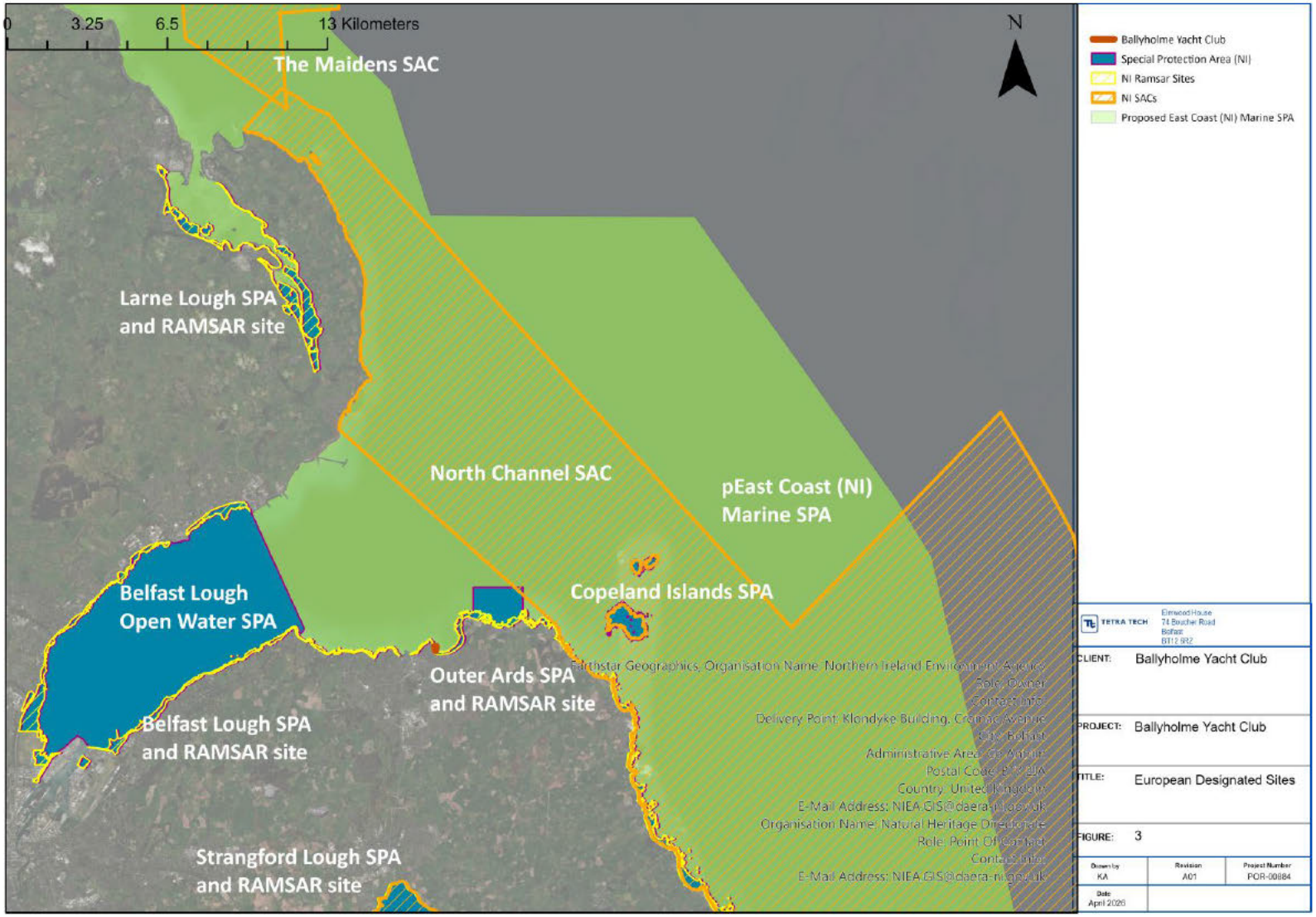
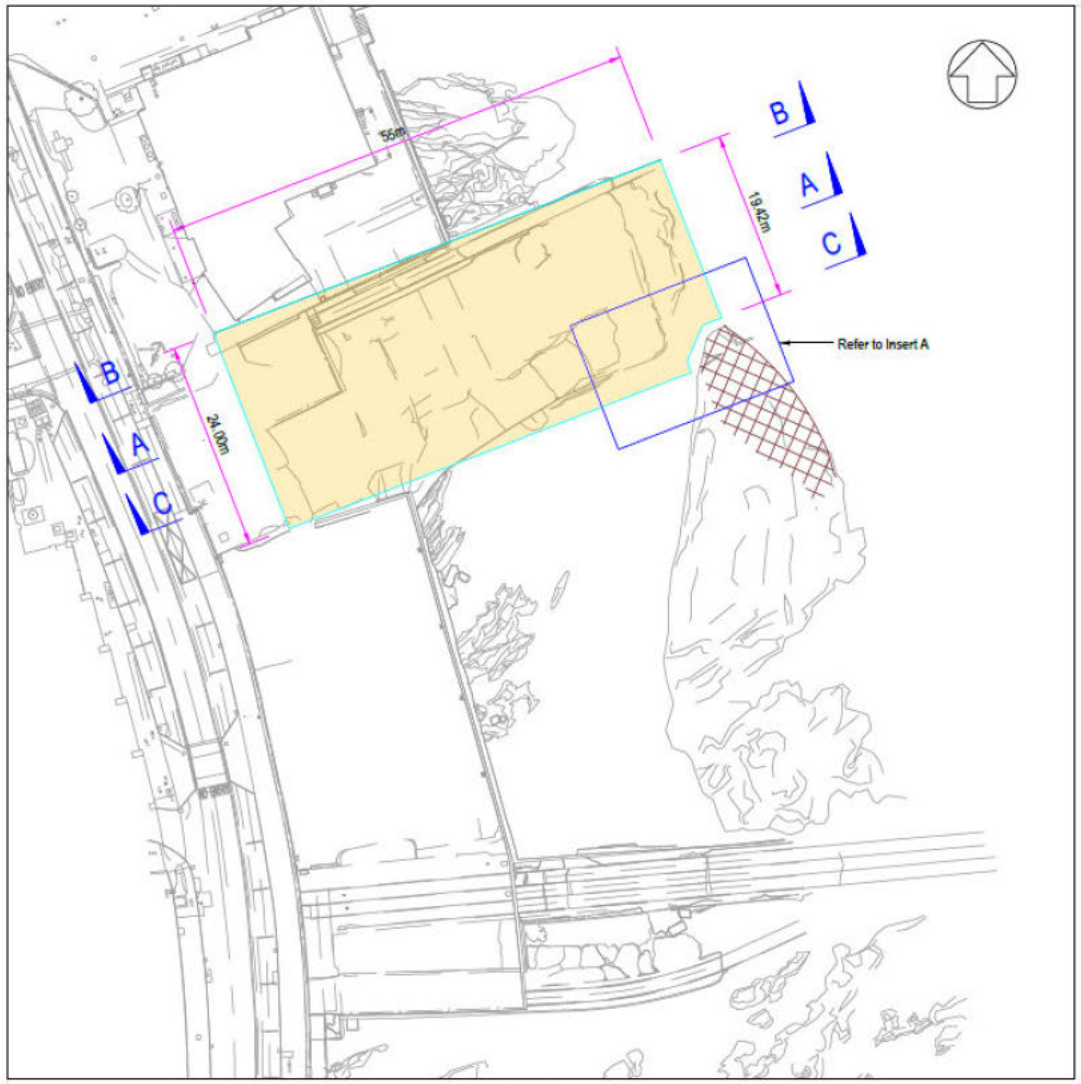


Figure 4: Modified Slipway Design



APPENDICES

Appendix A: Overwintering Bird Survey Report

Tetra Tech

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