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Translink Coastal Defence Section 2 to 6 Habitat Regulations Assessment

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Contents

1 Introduction 1

1.1 Background 1
1.2 Legislative Context 1

2 Habitats Regulation Assessment Methods 3

2.1 Overview 3
2.2 The Precautionary Principle 4
2.3 Guidance 4
2.4 Assumptions and Limitations 4

3 Description of the Project 5

3.1 Project Overview 5
3.2 Site Location 5
3.3 Proposed Works 6

4 European Sites 8

4.1 Project Area of Influence and European Sites 8
4.2 Belfast Lough Open Water Special Protection Area (SPA) 9
4.3 Belfast Lough Ramsar 10
4.4 North Channel Designated Special Area of Conservation (SAC) 10

5 Screening Assessment 11

5.1 Introduction 11
5.2 Potential Hazards to European Sites 11
5.3 Assessment of Likely Significant Effects 12
5.4 Screening Statement Conclusion 17

6 Appropriate Assessment 18

6.1 Introduction 18
6.2 General Scheme Mitigation Measures 18
6.3 In-combination Effects 19
6.4 Appropriate Assessment of Project Impacts and Mitigation 19
6.5 Implementation of Mitigation 22

7 Appropriate Assessment Conclusion 22

List of Figures

Figure 3-1: The patch repair works across Translink railway lines. 6

Figure 4-1 Sections 2, 3, 4, 5 and 6 in relation to Designated sites. 8

List of Tables

Table 2-1. The HRA Process 3

Table 3-1: Indicative proposed works at each asset site 6

Table 5-1. Assessment of Likely Significant Effects 12

Table 5-2. Summary of screening conclusions for the proposed scheme showing all screened in hazards and European Sites. 17

Table 6-2. Appropriate Assessment of Hazards and Mitigation 19

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1 Introduction

1.1 Background

JBA Consulting has been commissioned to undertake Habitat Regulations Assessments (HRA's) to inform remedial works for coastal assets in Northern Ireland, by Amey Consulting (Amey) on behalf of Translink. This HRA covers Sections 2, 3, 4, 5 and 6. Due to the potential impacts the proposed works could have upon the interest features of the Belfast Lough Special Protection Area (SPA) and Ramsar, a HRA is required to be undertaken by the competent authority(s), prior to the consenting of works.

This report provides information to support a HRA Screening and Appropriate Assessment for the proposed works. It is intended to identify, describe and assess impact pathways that could result in likely significant effects on European designated sites (i.e. SACs and SPAs) and Ramsar sites, followed by a more detailed assessment of the potential impacts of the work on site integrity, and the avoidance/mitigation measures required to ensure no adverse impact on site integrity.

1.2 Legislative Context

The Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019), also known as the 'Habitats Regulations', provide legal protection to habitats and species of national importance. The regulations also secure an ecological network of protected sites, consisting of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance) are given the same level of protection as SACs and SPAs.

Prior to the UK's withdrawal from the EU, SACs were designated and protected under domestic legislation transposed from European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive), and SPAs under European Directive 2009/147/EC on the Conservation of Wild Birds (Birds Directive). Together these sites formed a European-wide Natura 2000 network of protected sites. Since 31 December 2020, SACs and SPAs within the UK no longer fall within the Natura 2000 network, and instead form a National Site Network. SPAs and SACs continue to be referred to collectively as 'European sites' within the context of the Habitats Regulations, reflecting their international importance for the conservation of biodiversity.

SACs and SPAs within the National Site Network are also still designated for habitats listed on Annex I and for species listed on Annex II of the Habitats Directive, and criteria listed under the Birds Directive, and it is these Annex I habitats, Annex II species and Birds Directive Criteria against which assessments under the Habitats Regulations are still made. Regulation 63 of the Habitats Regulations states that "A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or

project which (a) is likely to have a significant effect on a European Site or a European offshore marine site (either alone or in-combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives." This process is commonly referred to as Habitats Regulations Assessment (HRA).

2 Habitats Regulation Assessment Methods

2.1 Overview

Habitat Regulations Assessment follows a four-stage process as outlined in the Habitats Regulations Assessment Handbook (DTA, 2019) and summarised in Table 2-1 below. This report provides evidence to support Stage 1 and Stage 2 of the HRA process, to provide the Competent Authority(s) with information to make their assessment.

Table 2-1. The HRA Process

HRA Stage	Description
Stage 1: Screening	This process identifies the likely significant effects upon a European site of a project or plan, either alone or incombination with other projects or plans and determines whether these impacts are likely to be significant. Following the recent ECJ judgement in the case of *People over Wind & Sweetman v Coillte Teoranta* (Case C-323/17) measures that are necessary to avoid or reduce impacts on the European site can only be at Stage 2. If no likely significant effect is determined, the project or plan can proceed. If a likely significant effect is identified, stage 2 is commenced.
Stage 2: Appropriate Assessment	Stage 2 is subsequent to the identification of likely significant effects upon a European site in stage 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or incombination with other projects or plans. This assessment is confined to the effects on the internationally important habitats and species for which the site is designated (i.e. the interest features of the site). Appropriate Assessments, in line with ECJ Case C-461/17 *Holohan v An Bord Pleanála*, must also consider impacts upon habitats and species within or outside of a site boundary if they support a qualifying feature and could impact upon the conservation objectives of the site. If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, stage 3 is commenced.

HRA Stage	Description
Stage 3: Assessment where no alternatives and adverse impacts remain	Where a plan or project has been found to have adverse impacts on the integrity of a European site, potential avoidance/mitigation measures or alternative options should be identified. If suitable avoidance/mitigation or alternative options are identified, that result in there being no adverse impacts from the project or plan on European sites, the project or plan can proceed. If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed. However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In these cases, compensatory measures will have to be put in place to offset any negative impacts.
Stage 4: Compensatory measures	Stage 4 comprises an assessment of the compensatory measures where, in light of an assessment of imperative reasons of overriding public interest, it is deemed that the project should proceed.

2.2 The Precautionary Principle

If there is uncertainty, and it is not possible, based on the information available, to confidently determine no significant effects on a site then the precautionary principle will be applied, and the plan will be subject to an appropriate assessment (HRA Stage 2).

2.3 Guidance

The methodology used for this assessment is based on guidance in The Habitats Regulations Assessment Handbook (DTA, 2019). In addition, the following guidance documents were also consulted:

- European Commission Notice: Managing Natura 2000 sites. The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (EC, 2018)
- UK Government Guidance on the Use of Habitats Regulations Assessment (UK Government, 2019).

2.4 Assumptions and Limitations

Information on the works and conditions on site are based on current knowledge at the time of writing. Cumulative impacts are based on published documentation. If other projects with the potential for cumulative impacts are identified, it may be necessary to re-assess this project.

3 Description of the Project

3.1 Project Overview

JBA Consulting (JBA) has been commissioned to undertake Habitat Regulations Assessments (HRA's) to inform remedial works for coastal assets in Northern Ireland, by Amey Consulting (Amey) on behalf of Translink. This HRA covers the remedial works across Sections 2, 3, 4, 5 and 6.

The proposed works include a varied programme of sea defence extensions and refurbishments to assets including sections of shoreline and existing rock armour and embankments where the operational railway is exposed to coastal flooding, wave action and erosion.

The aim of the proposed works is to enhance the long-term resilience of the railway infrastructure in response to the increasing pressures associated with climate change, including sea-level rise, ongoing coastal erosion and increased storm frequency and intensity.

Following the analysis of various optioneering solutions, Translink identified rock armour revetments as the most appropriate and sustainable coastal defence measure for the majority of the sites. Many of the asset sites already feature deteriorated and failing rock armour structures that now require strengthening and/or extension to improve their performance under the changing conditions. Other asset locations will require new rock armour revetments to replace or overlay existing grassed or concrete embankments that currently lack sufficient protection from coastal processes. Several asset sites will also require minor patch repairs to existing sea defence structures where local defects have been identified.

The rock armour defence solutions are currently at outline design stage, and the scheme is programmed to continue through to detailed design stage prior to tendering and final construction over the coming years.

3.2 Site Location

The Sites referred to in this report are within Sections 2, 3, 4, 5 and 6, which is part of a wider scheme comprising of sections of sea defences located along the railway track on the northern shores of Larne Lough (inlet from the Irish Sea). The Site consists of undefended grass embankments and sparse patches of rock armour in need of repair. The Carrickfergus and Larne Line railway track and embankment run through the site centre behind the embankments and rock armour, with a small intertidal beach at the foot of the revetment.

The overall scheme is split into 16No. site asset locations as shown in 3-1 below.



Figure 3-1: The patch repair works across Translink railway lines.

3.3 Proposed Works

The scheme involves a series of rock revetments and patch repair works on existing coastal defences. Table 3-1 indicates the anticipated works at each asset site.

Table 3-1: Indicative proposed works at each asset site

Asset Site	Type of Works	Works Description
2	Rock Armour Revetment	The revetment will be installed between Chainages 0-70 (342853E, 388274N to 342919E, 388305N) and tie into the existing grass embankment (southwest end) and sloped concrete revetment (northeast end).
3	Rock Armour Revetment	The revetment will be installed between Chainages 380-390 and tie into the existing grass embankment (northeast) and rock revetment (southwest)
4	Rock Armour Revetment	Section A will tie into the existing grass embankment (southwest end) and rock armour (northeast end). Section B will tie into the existing rock armour (western end and natural grassed embankment.

Asset Site	Type of Works	Works Description
5	Rock Armour Revetment	The newly enhanced revetment will be installed between Chainages 0-50 (345328E, 389067N to 345353E, 389110N) and tie into the existing grass embankment (southwest end) and rock armour (northeast end).
6	Rock Armour Revetment	The revetment will be installed between Chainages 0-5 (346651E, 390361N to 346647E, 390358N) and tie into the existing grass embankment (southwest) and concrete/stone revetment (northeast) end.

4 European Sites

4.1 Project Area of Influence and European Sites

Site 2 to Site 6 are adjacent to Belfast Lough Outer. Site 2 (NGR 42786 88251) is located approximately 1.8km from Belfast Lough Inner.

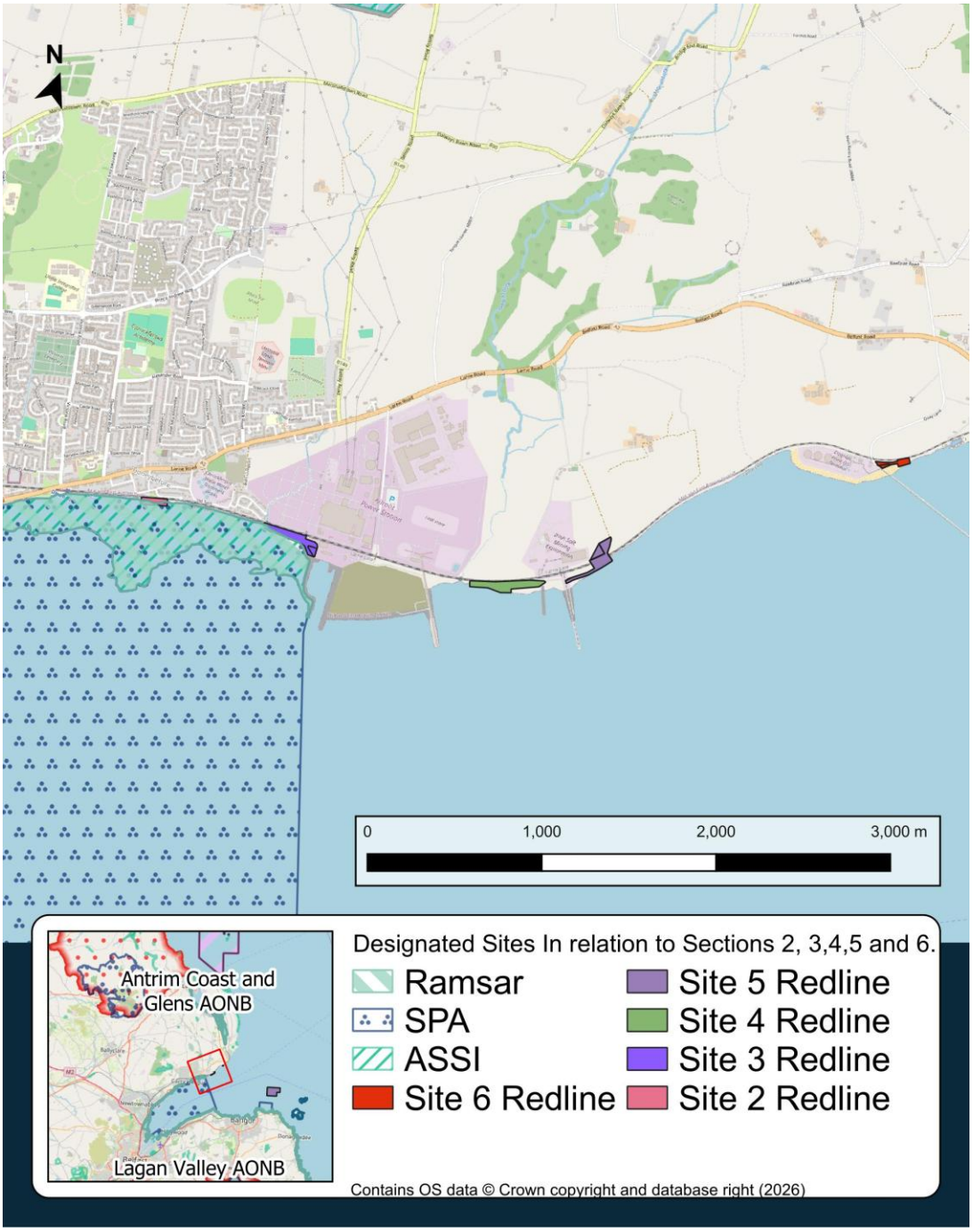


Figure 4-1 Sections 2, 3, 4, 5 and 6 in relation to Designated sites.

4.2 Belfast Lough Open Water Special Protection Area (SPA)

4.2.1 Qualifying Features

- The site is selected as a Special Protection Area (SPA) under the Department of the Environmental pursuant to article 4(1) and/or 4(2) of Council Directive 79/09/EEC on the conservation of wild birds as a Special Protection Area.

4.2.2 Conservation Objectives

The conservation of objective of the Belfast Lough Open Water SPA is 'To maintain the favourable conservation condition of the qualifying features (as outlined above) in the SPA'

Favourable conservation status of a habitat is achieved when:

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

The favourable conservation status of a species is achieved when:

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

4.3 Belfast Lough Ramsar

4.3.1 Qualifying Features

Belfast Lough is a large intertidal sea lough situated at the mouth of the River lagan on the east coast of Northern Island. The inner part of the lough comprises of a series of mudflats and lagoons. The outer lough is restricted to mainly rocky shores with some small sandy bays.

In the outer lough, the Ramsar boundary is entirely coincident with that of outer Belfast Lough Area of Special Scientific Interest but within the immediate harbour area the boundary has been redrawn to take into account permitted port related development and land which has taken place since the inner Belfast lough area of special scientific interest was declared in 1987.

The site qualifies for Ramsar designation under:

- Ramsar Criterion 3c - The site regularly supports internationally important numbers of Redshank *Tringa totanus* in winter.
- The site also supports nationally important numbers of Great Crested Grebe *Podiceps cristatus*, Shelduck *Tadorna tadorna,* Scaup *Aythya marila,* Eider *Somateria mollissima,* Goldeneye *Bucephala clangula,* Redbreasted Merganser *Mergus serrator* Oystercatcher *Haematopus ostralegus,* Purple sandpiper *Calidris maritima* Dunlin *C. aplina,* Black-tailed Godwit *Limosa limosa,* Bar-tailed Godwit *Limosa lapponica,* Curlew *Numenius arquata and* Turnstone *Arenaria interpres.*

4.3.2 Conservation Objectives

No specific conservation objectives have been set for the Belfast Lough Ramsar site.

4.4 North Channel Designated Special Area of Conservation (SAC)

Annex II species that are a primary reason for selection of this site:

- 1351 Harbour porpoise *Phocoena phocoena*

5 Screening Assessment

5.1 Introduction

This project is not wholly directly connected with, or necessary to, the conservation management of the listed site's qualifying features; therefore, a HRA screening assessment is required.

The following section identifies potential hazards of the proposed works. The site works at each location along the railway track will be undertaken concurrently, and on the same side of the lough; therefore no cumulative effects will occur. The effects of relevant hazards have been assessed in relation to each of the relevant qualifying features of the European sites outlined above. The likelihood of potential exposure to the hazard and the mechanism of effect are also identified where possible. This then allows for likely significant effects on the interest features of the designated sites to be identified.

5.2 Potential Hazards to European Sites

The proposed project, as detailed in Section 3, was assessed in order to identify potential hazards that might arise to the relevant interest features of the Belfast Lough Open Water SPA and Belfast Lough Ramsar and North Channel SAC. The list of potential hazards to the European sites are based on the designated site features and conservation objectives. These are:

- Direct habitat loss
- Noise and visual disturbance
- Water pollution
- Physical damage/mortality

5.3 Assessment of Likely Significant Effects

Assessment of the hazards identified above was undertaken to determine whether they would be likely to have a significant effect on the relevant qualifying features of the SPA and Ramsar, as a consequence of the project either alone or in combination with other plans or projects. The results of the screening assessment are given in Table 5-1. Plans and projects considered for the in-combination assessment are outlined in Section 6.4. Where appropriate, both construction and operational phase effects are considered.

Table 5-1. Assessment of Likely Significant Effects

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combinations
Belfast Lough Open Water SPA				
Department of the Environmental pursuant to article 4(1) and/or 4(2) of Council Directive 79/09/EEC on the conservation of wild birds as a Special Protection Area	Habitat Loss	The proposed works are located adjacent to the SPA boundary but works will remain contained within the existing railway track boundary. Works will be undertaken at low tide, with a maximum of three locations subject to repair. Given the localised nature of the works and their timing at low tide, suitable intertidal foraging habitat will remain available for wintering birds within the SPA. No direct loss of habitat within the SPA is anticipated. Therefore, potential impacts on the SPA's qualifying bird features are considered negligible.	No	No in combination assessment required; zero effect alone

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combinations
	Noise and visual disturbance	Works will be undertaken at low tide along the existing railway track boundary. Although sediment mobilisation could potentially increase localised turbidity and temporarily affect water clarity (Visual disturbance), any such effects are expected to be spatially limited and short-term. As wild birds may forage for fish within the surrounding waters, the prevention of sediment release will be important to avoid potential effects on foraging efficiency. Given the nature of the works, it is not anticipated that the works will result in any disturbance to the qualifying features of the SPA.	No	No in combination assessment required; zero effect alone
	Water pollution	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats and in the SPA, in the absence of suitable on-site avoidance and mitigation measures.	Yes	In combination assessment carried forward to Appropriate Assessment
	Physical damage/mortality	Given the nature of the works, it is not anticipated that the works will result in	No	No in combination assessment required; zero effect alone

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combinations
		any physical damage or injury to the qualifying features of the SPA.		
Belfast Lough Ramsar				
Ramsar Criterion 3c - The site regularly supports internationally important numbers of Redshank *Tringa totanus* in winter. The site also supports nationally important numbers of Great Crested Grebe *Podiceps cristatus*, Shelduck *Tadorna tadorna, Scaup Aythya marila, Eider Somateria mollissima, Goldeneye Bucephala clangula,* Redbreasted	Habitat Loss	The proposed works are located adjacent to the Ramsar boundary, however, works will remain contained within the existing railway track boundary and therefore no habitats within the Ramsar will be impacted. Works will be undertaken at low tide, with a maximum of three locations subject to repair. Given the localised nature of the works and their timing at low tide, suitable intertidal foraging habitat will remain available for birds within the Ramsar. No direct loss of habitat within the Ramsar is anticipated. Therefore, potential impacts on the Ramsar qualifying bird features are considered negligible.	No	No in combination assessment required; zero effect alone

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combinations
Merganser *Mergus serrator* Oystercatcher *Haematopus ostralegus, Purple sandpiper Calidris maritima* Dunlin *C. aplina,* Black-tailed Godwit *Limosa limosa,* Bar-tailed Godwit *Limosa lapponica,* Curlew *Numenius arquata and Turnstone Arenaria interpres.*	Noise and visual disturbance	Works will be undertaken at low tide, with a maximum of three locations subject to repair. Given the localised nature of the works and their timing at low tide, suitable intertidal foraging habitat will remain available for birds within the Ramsar. Works will be undertaken in the dry; Given the nature of the works, it is not anticipated that the works will result in any disturbance to the qualifying features of the Ramsar.	No	No in combination assessment required; zero effect alone
	Water pollution	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats and in the Ramsar, in the absence of suitable on-site avoidance and mitigation measures.	Yes	In combination assessment carried forward to Appropriate Assessment
	Physical damage/mortality:	Given the nature of the works, it is not anticipated that the works will result in any physical damage or injury to the qualifying features of the Ramsar.	No	No in combination assessment required; zero effect alone
North Channel SAC				

Qualifying Feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No	Likely Significant Effect in Combinations
1351 Harbour porpoise *Phocoena phocoena*	Noise and visual disturbance	Given the localised nature of the proposed railway track repairs, which will be undertaken within the existing railway track boundary at low tide, significant effects on harbour porpoise are not anticipated. The works will be not expected to generate underwater noise or vibration of sufficient intensity to cause significant disturbance, provided that no activities capable of generating significant underwater noise are undertaken.	No	No in combination assessment required; zero effect alone
	Water pollution	Any potential sediment mobilisation or accidental pollutant release is expected to be limited to the immediate works area, subject to appropriate pollution prevention and sediment-control measures. Consequently, significant effects on the harbour porpoise qualifying feature are not anticipated, subject to confirmation that there is no relevant impact pathway between the works and the SAC.	Yes	In combination assessment carried forward to Appropriate Assessment

5.4 Screening Statement Conclusion

At Stage 1 certain effects could not be screened out without appropriate mitigation/avoidance strategies put in place; consequently, a Stage 2 appropriate assessment is required. Those effects requiring appropriate assessment are summarised in Table 5-2 below.

Table 5-2. Summary of screening conclusions for the proposed scheme showing all screened in hazards and European Sites.

Qualifying Feature	Hazard	Likely significant effect alone or in combination
Belfast Lough Open Water SPA		
Department of the Environmental pursuant to article 4(1) and/or 4(2) of Council Directive 79/09/EEC on the conservation of wild birds as a Special Protection Area	Water Pollution	Both
Belfast Lough Ramsar		
Ramsar Criterion 3c - The site regularly supports internationally important numbers of Redshank *Tringa totanus* in winter. The site also supports nationally important numbers of Great Crested Grebe *Podiceps cristatus*, Shelduck *Tadorna tadorna, Scaup Aythya marila, Eider Somateria mollissima, Goldeneye Bucephala clangula,* Redbreasted Merganser *Mergus serrator* Oystercatcher *Haematopus ostralegus, Purple sandpiper Calidris maritima* Dunlin *C. aplina,* Black-tailed Godwit *Limosa limosa,* Bar-tailed Godwit *Limosa lapponica,* Curlew *Numenius arquata and Turnstone Arenaria interpres.*	Water Pollution	Both
North Channel SAC 1351 Harbour porpoise Phocoena phocoena	Water Pollution	Both

6 Appropriate Assessment

6.1 Introduction

Stage 2 of the HRA process is an Appropriate Assessment, which is required because likely significant effects caused by the proposed works at Sections 2, 3, 4, 5 and 6 have been identified on the Belfast Lough SPA and Ramsar and the North Channel SAC. The Appropriate Assessment determines whether the project will have an adverse impact on the integrity of the European sites. In this assessment, avoidance or mitigation measures are applied to a point where the effects identified are no longer significant. If no significant impact on site integrity can be demonstrated, beyond reasonable scientific doubt, the project can proceed. If sufficient avoidance or mitigation measures cannot be applied, the project should not be taken forward in its current form unless there is a demonstration of no suitable alternatives and there are reasons of overriding public interest.

6.2 General Scheme Mitigation Measures

6.2.1 Pollution Prevention Measures

Appropriate pollution prevention measures will be implemented to ensure that the habitats within proximity of the works, including the interest features and supporting habitats of the Belfast Lough SPA and Ramsar and North Channel SAC are not degraded as a result of pollution events during the construction phase. This mitigation will include:

- Following relevant guidance e.g. CIRIA Guidance: Control of water pollution from construction sites. Guidance for consultants and contractors (C532D) (Masters-Williams, 2001), including the delivery of toolbox talks to site staff.
- Any chemical, fuel and oil stores will be located on impervious bases within a secured bund with a storage capacity 110% of the stored volume.
- Biodegradable oils and fuels will be used where possible.
- Drip trays will be placed underneath any standing machinery to prevent pollution by oil/fuel leaks. Refuelling of vehicles and machinery will be carried out on an impermeable surface in one designated area well away from the high tide mark with capture of any spillages.
- Emergency spill kits will be available on site and staff trained in their use.
- Operators will check their vehicles on a daily basis before starting work to confirm the absence of leakages. Any leakages will be reported immediately.
- Daily checks will be carried out and records kept on a weekly basis and any items that have been repaired/replaced/rejected noted and recorded. Any items of plant machinery found to be defective will be removed from site immediately or positioned in a place of safety until such time that it can be removed.
- This mitigation is industry standard practice and as a result will be incorporated into the project through the Environmental Management Plan (EMP).

6.3 In-combination Effects

The proposed works at Sections 2, 3, 4, 5 and 6 are part of a wider scheme to complete remedial works for coastal assets in Northern Ireland, by Amey Consulting (Amey) on behalf of Translink. The scheme involves undertaking works at 26 coastal and estuarine flood defence locations along Translink's railway system in Northern Ireland. Four of these sites comprise minor patch repair works only. The works are required to improve the resilience of the existing rail infrastructure against the risks associated to climate change, including rising extreme sea levels and more severe storm events. The construction methodology is yet to be finalised and is subject to change as the scheme develops however in order to meet project delivery schedules, parallel working between sites may occur.

Other plans and projects with potential in-combination impacts were reviewed through the Derry City & Strabane District Council Planning Portal. No plans were identified that could potentially act in-combination with the proposed works. All of the planning applications within 1km of the site are all small-scale works that have no direct connection to the site. There are no Nationally Significant Infrastructure projects within 1km of the site.

6.4 Appropriate Assessment of Project Impacts and Mitigation

Taking into account the prevailing site conditions, screened in qualifying features, and the typical habitats and species necessary to the conservation of these features, the proposed works and mitigation measures and the conservation objectives for each European site, the following table details the Appropriate Assessment undertaken for the project. In Table 6-2 avoidance and mitigation measures are presented, and an assessment is made on whether an adverse impact remains after the mitigation is applied.

Table 6-1. Appropriate Assessment of Hazards and Mitigation

Qualifying Feature	Description of adverse effect(s)	Can adverse effect(s) be mitigated?	Description of mitigation measures and how they would be applied	Can adverse effect on site integrity be ruled out?
Belfast Lough Open Water SPA, Ramsar				
Ramsar Criterion 3c - The site regularly supports internationally important numbers of Redshank *Tringa totanus* in winter, and other internatiall important bird species. Department of the Environmental pursuant to article 4(1) and/or 4(2) of Council Directive 79/09/EEC on the conservation of wild birds as a Special Protection Area	Water pollution: Construction activity may result in accidental fuel or concrete spills which could cause changes in water chemistry and impact the habitats within the SPA.	Yes	Strict pollution prevention measures will be implemented on site, as outlined in Section 6.3.	Yes
North Channel SAC				

Qualifying Feature	Description of adverse effect(s)	Can adverse effect(s) be mitigated?	Description of mitigation measures and how they would be applied	Can adverse effect on site integrity be ruled out?
1351 Harbour porpoise *Phocoena phocoena*	Water pollution: Construction activity may result in accidental fuel or concrete spills which could cause changes in water chemistry and impact the habitats within the SPA.	Yes	Strict pollution prevention measures will be implemented on site, as outlined in Section 6.3.	Yes

6.5 Implementation of Mitigation

The mitigation measures listed above are to be included in the Method Statement produced by the contractor who will be undertaking the works. The appointed contractor will therefore be responsible for ensuring that all on-site mitigation measures are implemented effectively.

7 Appropriate Assessment Conclusion

The proposed works will not have an adverse impact upon the SPA and Ramsar either alone or in combination with any other plans or projects, providing the following mitigation measures are implemented:

- Industry standard pollution prevention measures, particularly addressing the risks of fuel and concrete spills.
- A pre-works check will be completed as close to the construction works starting as possible in order to identify any new opportunities for nesting bird species eg. terns.

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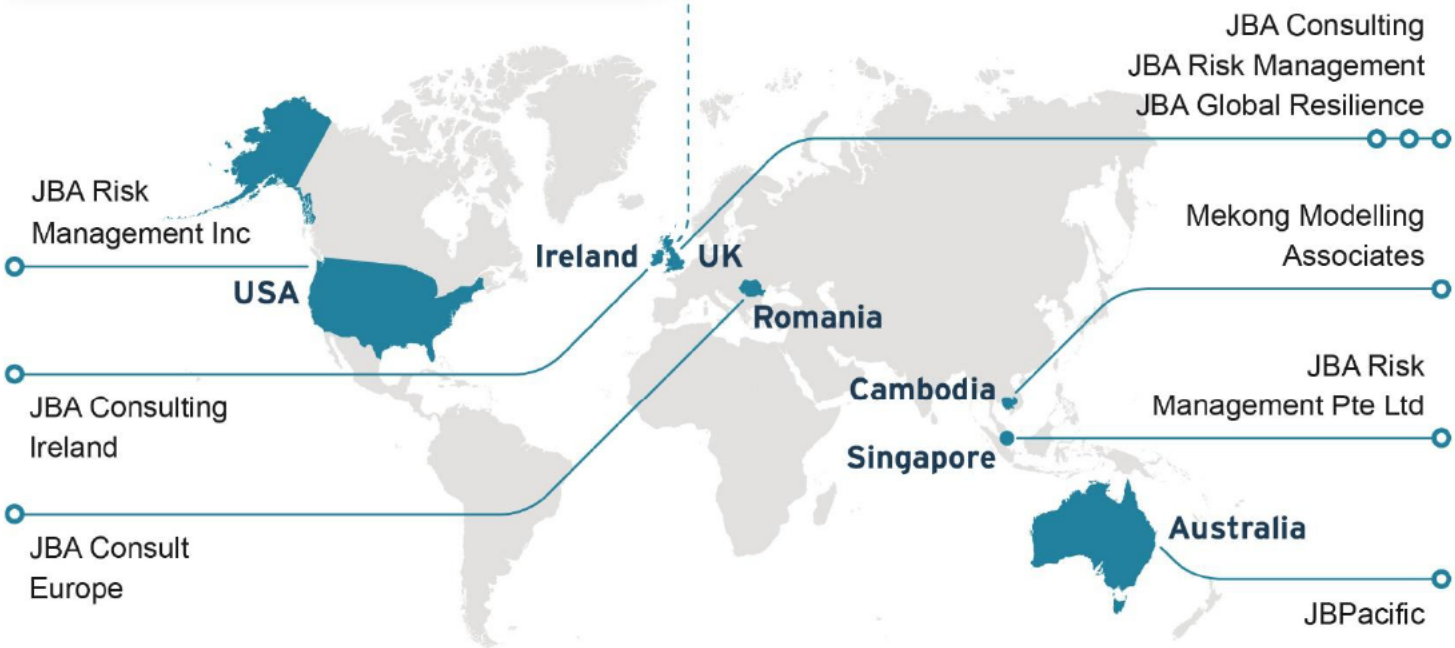
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