

30th November 2020

Subject: Appeal FAC271/2020 regarding licence CK14-FL0142

Dear 

I refer to your appeal to the Forestry Appeals Committee (FAC) in relation to the above licence issued by the Minister for Agriculture, Food and the Marine. The FAC established in accordance with Section 14 A (1) of the Agriculture Appeals Act 2001 has now completed an examination of the facts and evidence provided by all parties to the appeal.

Background

Licence CK14-FL0142 for felling and replanting of 10.89 ha at Ballynona North, Walshtown More (West), Co. Cork was issued by the Department of Agriculture, Food and the Marine (DAFM) on 22nd May 2020.

Hearing

A hearing of appeal FAC271/2020 was held by the FAC on 11th November 2020.

FAC Members in attendance: Mr. John Evans (Deputy Chairperson), Mr. Derek Daly, Mr. Seamus Neely, Mr. Vincent Upton

Decision

Having regard to the evidence before it, including the licence application, processing by the DAFM, the notice of appeal, submission received and, in particular, the following considerations, the Forestry Appeals Committee (FAC) has decided to affirm the decision of the Minister for Agriculture, Food and the Marine regarding licence CK14-FL0142.

The licence pertains to the felling and replanting of a forest on 10.89 ha at Ballynona North, Walshtown More (West), Co. Cork. The forest is currently composed of 99% Sitka Spruce and 1% lodgepole pine and replanting would be of Sitka spruce. The site is described as moderately sloped on a mineral soil, acid brown earths and podzols and located in the Dungourney_010 & Owennacurra_020 river basins. A prescreening report and harvest plan were prepared and submitted by the Applicant. A screening for appropriate assessment was undertaken by DAFM that identified three European sites within 15km (2170 Blackwater River (Cork/Waterford) SAC, 4030 Cork Harbour SPA, and 1058 Great Island Channel SAC) and considered other plans and projects in combination with the proposal as documented. The

application was referred to Cork County Council but no response was provided on file. The licence was issued subject to a number of conditions related to environmental protection and sustainable forest management, including aquatic zone and public road setbacks. The licence was approved on 22nd May 2020 and is exercisable until 31st December 2022.

There is one appeal against the decision. The grounds contend that the decision does not comply with the Habitats Directive, the Birds Directive and the Environmental Impact Assessment Directive. It suggests that the Forest Service identified that there were Natura 2000 sites within 15km and that in this case an appropriate assessment was legally required. The grounds include quotes from Case C-323/17 regarding measures considered at the screening stage for appropriate assessment. The grounds suggest that where an EIA screening is undertaken that other forestry projects in the area must be taken into account, including felling. The Appellant also submitted grounds relating to suggested legal obligations of the Forestry Appeals Committee.

In a statement to the FAC, the DAFM stated that they are satisfied that the decision met their criteria and guidelines and that they confirm the licence. They submit that they followed the current DAFM AA (appropriate assessment) Screening guidance document and considered Natura 2000 sites within 15km. They submitted that they considered the application information provided by the Applicant including harvesting and operational procedures, maps and a pre-screening report. They submitted that the proposal when considered in combination with other plans and projects as identified in the applicants pre-screening report, will not give rise to the possibility of a significant effect on the relevant European sites. They submitted that a number of qualifying interests and special conservation interests were truncated in the screening form but that all were considered during the process. They further submit that other plans and projects were considered in an in-combination assessment.

The FAC requested a report from an independent consultant in relation to the proposal and, in particular, the requirements of the Habitats and EIA Directive. This report, which is available on the public file, described and considered the proposal and the surrounding landscape and the DAFM decision. This report identifies the same three European sites as noted above and reaches the conclusion that that the project individually, or in combination with other plans or projects, is not likely to have any significant effect on any Natura 2000 site, having regard to the reasons for designating the sites and their conservation objectives. Regarding the EIA Directive the report concludes that the felling proposed does not come within the classes of project covered by the EU EIA Directive and that the proposed development would not be likely to give rise to significant effects on the environment of itself or cumulatively with other projects.

In considering the grounds of appeal, the FAC considered, in the first instance, the screening for appropriate assessment undertaken by the DAFM. The grounds of appeal do not identify any specific European sites, measures or effects of concern. Three sites are identified within 15km from the proposal by the DAFM and the FAC confirmed this using information provided by the NPWS and EPA. The DAFM considered there was no requirement to extend the 15km zone in this instance and based on the nature, scale and location of the proposal the FAC concurred with this conclusion. A boundary of the Blackwater

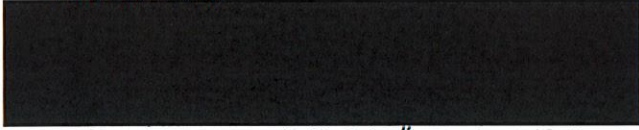
River (Cork/Waterford) SAC lies 6.8 km to the north and this SAC lies in the Blackwater (Munster) Catchment. The licensed forest is in a separate catchment, the Lee, Cork Harbour and Youghal Bay Catchment, and there is no hydrological connection to the SAC as noted in the screening report. The licence is for felling and replanting of a commercial forest located at a considerable separation distance from the closest boundary of the SAC. The boundaries of Great Island Channel SAC and Cork Harbour SPA lie 9.8km to the north. A stream runs to the northeast of the forest and flows southerly to meet a river identified as the Dungourney by the EPA which flows to Midleton and enters the sea and the boundary of Great Island Channel SAC and Cork Harbour SPA. The hydrological distance is some 18km. The DAFM screened the sites out based on the degree of separation and unsuitability of the forest and absence of habitats related to the qualifying interests of the coastal European sites. The DAFM recorded other plans and projects, including forestry and non-forestry projects and plans, that were considered in relation to potential in-combination effects of the proposal. While the licence includes a number of conditions that relate to the protection of water quality and the environment generally, the FAC is satisfied that there are no measures included that relate to the avoidance or reduction of significant effects on a European site and that none were considered in the screening or required to reach the conclusion. Based on the information before it the FAC is satisfied that no serious or significant error or series of errors occurred when making the screening decision and that the proposal individually, or in combination with other plans or projects, is not likely to have any significant effect on any European site.

The FAC considered the contention that the proposed development should have been addressed in the context of the Environmental Impact Assessment (EIA) Directive. The EU EIA Directive sets out in Annex I a list of projects for which EIA is mandatory. Annex II contains a list of projects for which member states must determine through thresholds or on a case by case basis, or both, whether or not EIA is required. Neither afforestation nor deforestation are referred to in Annex I. Annex II contains a class of project specified as "initial afforestation and deforestation for the purpose of conversion to another type of land use" (Class 1 (d) of Annex II). The Irish Forestry Regulations 2017 (S.I. 191 of 2017), in relation to forestry licence applications, require the compliance with the EIA process for applications relating to afforestation involving an area of more than 50 Hectares, the construction of a forest road of a length greater than 2000 metres and any afforestation or forest road below the specified parameters where the Minister considers such development would be likely to have significant effects on the environment. The decision before the FAC relates to the felling and subsequent replanting of 10.89 ha of commercial forest managed for roundwood production. The FAC concluded that the felling and replanting of trees, as part of a forestry operation with no change in land use, does not fall within the classes referred to in the Directive, and is not covered by national regulations and that screening under the EIA Directive was not required in this case.

In considering the appeal the FAC had regard to the record of the decision and the submitted grounds of appeal, other submissions received, and a consultant's report available on the public file. The FAC is satisfied that a serious or significant error or a series of errors was not made in making the decision and neither that the decision was made without complying with fair procedure. The FAC is thus affirming the decision of the Minister regarding licence CK14-FLO142 in line with Article 14B of the Agricultural

Appeals Act 2001, as amended. In deciding to affirm the decision, the FAC considered that the proposed development would be consistent with Government policy and Good Forestry Practice.

Yours sincerely,



Vincent Upton On Behalf of the Forestry Appeals Committee

FAC Ref. No. 271/2020

DAFM Ref. No. CK14-FL0142

Details of application:

The application was for the clear felling and re-planting of a forestry block of 10.89 hectares of Sitka spruce trees in the townlands of Ballynona North and Walshtown More (West) in southeast Co Cork. The application indicates that 10.35 hectares of the lands would be re-planted with Sitka spruce and that 0.54 hectares would be retained as open space. There is no reference to open space in the licence although some of the conditions appear to allow for such.

The information in the documentation indicates that the soils Acid Brown Earths and Brown Podzolics. The slope is indicated to be predominantly moderate between 0% and 15%.

The application documentation included copies of [REDACTED] Harvesting Environmental Rules, Establishment Rules and Harvesting Site Safety Rules.

Location and description of the project lands:

The lands are part of a much larger forested area located in southeast Co. Cork about 8 kilometres north of Midleton and about 12 kilometres to the north of the eastern end of Great Island Channel. The lands are located in a rural area about 23 kilometres to the northeast of Cork city centre. The aerial photograph submitted as part of the application indicates forestry to the northwest, north, northeast, east, southeast and south. The southwest corner of the 5-sided plot, where felling is proposed, abuts lands in agricultural use.

The main land uses in the general area are agriculture and forestry. Agriculture is predominant in the wider area but forestry predominates in the local area where the project lands are located.

The bulk of the project lands are located above the 600-foot contour as indicated on the O.S. maps. A stream flows in a northwest to southeast direction along the northeast edge of the lands. The eastern point of the lands near the public road is the lowest point in the lands. The O.S. maps indicate a bench mark of 576.4 feet over O.D. near the road. The

O.S. maps indicate the bulk of the lands being rough grazing and furze or whins at the time of the survey. The O.S. maps indicate that the entirety of the lands in question are in the townland of Walshtown More. The stream to the northeast is indicated to be the townland boundary with Ballynona North to the northeast of the stream.

There is no national monument or building located within the project lands. The closest monument indicated in the national inventory is a Gallán on standing stone located a short distance away in forestry lands to the northwest. There are also 2 monuments located in the lands on the east side of the local road where there is an existing warehousing facility and planning permission for a large extension to same.

There are no houses located close to the project lands. The closest house is located on the east side of the local road about 400 metres to the south. There is a relatively large warehousing development located a short distance away on the southeast side of the local road. This at the nearest point is, at present about 250-300 metres from the project lands. The business is a maturation warehousing plant used by Irish Distillers. The main access to this business is from a public road to the east (I3800) and there is no access from the local road (L7693) onto which the project lands have frontage. Planning permission Ref No. 194641 indicates that the extended development as permitted on 23/08/2019 would extend closer to the local road (L7693) onto which the project lands have frontage. There would also be an emergency entrance to the warehousing plant from this local road.

Decision of DAFM:

The Department decided to approve the project and to grant a licence for the clear felling and re-planting proposed. The licence is subject to 10 conditions numbered (a) to (j). The conditions are of a general nature requiring compliance with the Forestry Service standards and requirements.

Condition No. (h) requires that, in accordance with the Forestry and Water Quality Guidelines, 20% of the aquatic buffer zone is to be planted with broadleaves. Planting is to be in an undulating fashion to create a sequence of varying spaces. The condition also requires that no trees are to be planted within 5 metres of the aquatic zone. (It is stated that the buffer zone width may vary depending on soil conditions etc).

Condition No. (i), which refers to the Forestry and Landscape Guidelines and the Code of Best Forest Practice, states that no conifers are to be replanted within 20 metres of the public road. It also states however that broadleaves and diverse conifers are to be planted within the strip 10-20 metres from the public road in an undulating fashion.

Reasons are given for all the conditions with the exception of conditions (h) and (i). None of the conditions appear to have been imposed to reduce or mitigate the effect of the project on any Natura site.

Grounds of appeal:

The appellant [REDACTED] submits that the decision does not comply with the Habitats Directive, the Birds Directive and the Environmental Impact Assessment Directive. He submits that the EU Court of Justice has repeatedly held that Member States have an obligation to achieve the result envisaged by the Directive and they have a duty to take all appropriate measures, whether general or particular, to ensure fulfilment of that obligation. He submits that this obligation is binding on all the authorities of Member States, including, for matters within their jurisdiction, the courts.

The appellant submits that the obligation of a national court to interpret national law, as far as possible in accordance with EU law, does not require that the parties to the proceedings before it expressly assert that specific interpretation, if those parties allege at least an infringement of the relevant provisions of EU law. He submits that this must apply to the FAC as the obligation is binding on all the authorities of Member States.

DAFM response to appeal:

The Department submits that the 10.89 hectare felling and reforestation project licenced as CK14-FL0142 was subjected to the DAFM's AA Screening procedure. The AA screening report completed by the inspector is included in the documentation. Appropriate Assessment screening was carried out by DAFM for European sites within 15 km from the clear-fell and reforestation project. Felling licence application information submitted by [REDACTED] harvesting and establishment operational procedures as well as an Appropriate Assessment Pre-screening Report and associated Pre-screening Report methodology document were considered during the licencing process.

Having reviewed the details of relevant European sites, their qualifying interests and conservation objectives, the Department deemed that the 10.89 hectare felling and reforestation project, when considered in combination with other plans and projects as identified in the applicants pre-screening report, will not give rise to the possibility of a significant effect on the relevant screened European sites. As such, the clear-fell

and reforestation project was screened out and an Appropriate Assessment deemed not required in relation to the European sites considered during the screening. For the purposes of 42(16) of S.I.477 / 2011, DAFM has determined that the project will not adversely affect the integrity of any European sites. A felling licence was issued for the clear-fell and reforestation project having considered (where applicable) the comments and observations of referral bodies who submitted information to DAFM in respect of the licence. For consideration of in-combination effects of the proposed project, DAFM carried out an in-combination assessment and included an associated in-combination statement based on this information. This statement is consistent with the licensee's in-combination statement submitted in their AA Pre-screening report.

Screening for Appropriate Assessment:

There are 3 Natura 2000 sites located within 15 kilometres of the project lands. The sites in question are:

River Blackwater (Cork- Waterford) SAC which, at the closest point, is located about 6.7 kilometres to the northwest.

Cork Harbour SPA located, at the closest point, south of Midleton about 9.5 kilometres from the project lands and

Great Island Channel located also south of Midleton about 9.5 kilometres from the project lands, at the closest point.

The River Blackwater SAC is located in the catchment of the River Blackwater. The project lands, however, are located in the catchment of the Owennacarra River. Drainage is southwards to the Great Island Channel and the outer part of Cork Harbour. There is no downstream hydrological connection from the project lands to the River Blackwater SAC.

The qualifying interests of the River Blackwater SAC are

Estuaries [1130]

Mudflats and sandflats not covered by seawater at low tide [1140]

Perennial vegetation of stony banks [1220]

Salicornia and other annuals colonising mud and sand [1310]

Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330]

Mediterranean salt meadows (*Juncetalia maritimi*) [1410]

Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation [3260]

Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0]

Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*) [91E0]

Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]

Austropotamobius pallipes (White-clawed Crayfish) [1092]

Petromyzon marinus (Sea Lamprey) [1095]

Lampetra planeri (Brook Lamprey) [1096]

Lampetra fluviatilis (River Lamprey) [1099]

Alosa fallax fallax (Twaiite Shad) [1103]

Salmo salar (Salmon) [1106]

Lutra lutra (Otter) [1355]

Trichomanes speciosum (Killarney Fern) [1421]

In the absence of any hydrological connection or other potentially impacting pathway from the project lands to the SAC and having regard to the separation distance the tree felling and replanting proposed would have no impact on the qualifying interests of the SAC. The project is accordingly not likely to have any significant effect on the River Blackwater (Cork-Waterford) SAC.

Cork Harbour SPA is located over 9 kilometres from the project lands. The town of Midleton is located between the SPA and the project lands. The special interests for which the SPA has been designated are

Little Grebe (*Tachybaptus ruficollis*) [A004]

Great Crested Grebe (*Podiceps cristatus*) [A005]

Cormorant (*Phalacrocorax carbo*) [A017]

Grey Heron (*Ardea cinerea*) [A028]

Shelduck (*Tadorna tadorna*) [A048]

Wigeon (*Anas penelope*) [A050]

Teal (*Anas crecca*) [A052]

Pintail (*Anas acuta*) [A054]

Shoveler (*Anas clypeata*) [A056]

Red-breasted Merganser (*Mergus serrator*) [A069]

Oystercatcher (*Haematopus ostralegus*) [A130]

Golden Plover (*Pluvialis apricaria*) [A140]

Grey Plover (*Pluvialis squatarola*) [A141]

Lapwing (*Vanellus vanellus*) [A142]

Dunlin (*Calidris alpina*) [A149]

Black-tailed Godwit (*Limosa limosa*) [A156]

Bar-tailed Godwit (*Limosa lapponica*) [A157]

Curlew (*Numenius arquata*) [A160]

Redshank (*Tringa totanus*) [A162]

Black-headed Gull (*Chroicocephalus ridibundus*) [A179]

Common Gull (*Larus canus*) [A182]

Lesser Black-backed Gull (*Larus fuscus*) [A183]

Common Tern (*Sterna hirundo*) [A193]

Wetland and Waterbirds [A999]

A mature coniferous forest is not a breeding, roosting or foraging habitat for any of the wetlands and water birds for which the SPA has been designated. The felling and re-planting proposed would have no direct effect on the bird species for which the SPA has been designated. Having regard to this and to the distance to the SPA from the project lands the project would not be likely to have any significant effect on the Cork Harbour SPA.

The Great Island Channel SAC is located over 9.5 kilometres (direct distance) from the project lands. The distance along the hydrological connection is, however, considerably greater. The stream draining the lands (a tributary of the Dungourney River) and the river system into which it flows, takes a circuitous route flowing towards the southeast initially, towards Dungourney, prior to flowing southwards and then westwards to Midleton. I estimate that the distance along the hydrological route is in the order of 17 kilometres. I note that a similar distance is given in the pre-approval screening carried out by the applicant.

The qualifying interests for the Great Island Channel are

Mudflats and sandflats not covered by seawater at low tide [1140]

Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330]

The conservation objectives are to maintain and, in the case of the Atlantic salt meadows, restore the favourable conservation condition of the habitats for which the SAC has been designated.

Having regard to the nature of these coastal habitats and the distance from the project lands the proposed tree felling and re-planting would have no impact on the SAC in question here. The proposed project is accordingly not likely to have a significant effect on the Great Island Channel SAC.

On checking myplan.ie I find that the closest planning permissions (since 2010) were for extensions to the maturation warehousing complex on the lands to the southeast on the opposite side of the local road and also on the opposite side of the stream draining the project lands. The latest permission here was for 60 additional warehouses. Planning permission was granted on 23/09/2019. (Ref. 194641). The next nearest permission, other than for development in the warehousing site, was for the construction of a garage and associated works in a residential site a short distance away to the south. This permission expired on 4/6/2017. (Ref. 124455). Several planning permissions in the general area have been referenced in the in-combination assessment carried out by the Department and the applicant. None of these developments would have in-combination effects on any Natura 2000 site with the tree felling now in question. (The project lands were included in the site of proposed wind farm developments in the past. These applications are listed in the documentation. There was an application initially for an 11-turbine development and later for a 7-turbine development. The proposed developments were refused planning permission on appeal. -An Bord Pleanála references 04-243630 and 04-246824-). I also consider that the development would not have any significant effect on Natura 2000 sites in combination with developments envisaged by the County

Cork development plan. This plan contains provisions to protect all designated natural heritage sites including Natura 2000 sites

I do not have detailed drawings indicating the locations of other forestry related developments but as I consider that the proposed project of itself would have no effect on any Natura site, I consider that there would not be any significant in-combination effect on any Natura 2000 site. (I note that the in-combination assessment carried out by the Department refers to licences for 9 private felling projects. I note however that 2 cases are listed twice and one of these indicates that the felling application was cancelled. The total area of the other 6 projects listed would be 70.67 hectares. It is indicated that no data was found in relation to Coillte felling projects. The pre-screening report submitted by Coillte, however, indicates that Coillte had submitted 15 applications for felling within 1.5 kilometres for an area totalling 360.29 hectares. The report also states that there had been 8 applications for felling by private parties within 1.5 kilometres. Only 4 of the reference numbers, however, correspond with these listed in the Departments in-combination assessment).

In the above assessment I have not considered the normal good felling practices referred to in the documentation and in the licence in forming my conclusions. I consider, however, that compliance with the various guidelines etc referred to would re-enforce my conclusions. I also consider that the practices referred to are designed to protect the local environment, as they are general standards for all felling, and are not designed to prevent any significant effect on the Natura 2000 sites.

The proposal is clearly not necessary to or connected with the management of any Natura 2000 site. I conclude that the proposed felling and replanting, of itself or in-combination with any other plans or projects, is not likely to have any significant effect on any Natura 2000 site. In these circumstances the carrying out of an Appropriate Assessment as referred to in Article 6(3) of the EU Habitats Directive is not required.

Screening for Environmental Impact Assessment (EIA):

In my screening for EIA I have regard to the requirements contained in the EU Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU), in Irish regulations transposing the Directive into Irish law and to the Guidance for Consent Authorities regarding Sub-threshold Development published by the Department of the Environment in August 2003. I have had regard to the characteristics of the project, the location of the project (including the environmental sensitivity of the area) and the types and characteristics of potential impacts of the development as referred to in Annex III of the Directive. I have also taken account of my conclusions, set out above, in relation to the likely impact of the development on any Natura 2000 site.

The EU Directive sets out, in Annex I a list of projects for which EIA is mandatory. Annex II contains a list of projects for which member states must determine through thresholds or on a case by case basis (or both) whether or not EIA is required. Neither afforestation nor deforestation (nor clear-felling) are referred to in Annex I. Annex III contains a class of project specified as “initial afforestation and deforestation for the purpose of conversion to another type of land use”. (Class 1 (d) of Annex II). The Irish Regulations, in relation to forestry licence applications, require the compliance with the EIA process for applications relating to afforestation involving an area of more than 50 Hectares, the construction of a forest road of a length greater than 2000 metres and any afforestation or forest road below the specified parameters where the Minister considers such development would be likely to have significant effects on the environment. It appears to me that felling of trees and subsequent replanting, as part of a forestry operation with no change in land use, does not fall within the classes referred to in the Directive, and is similarly not covered by the Irish regulations (S.I. 191 of 2017). I will, however, consider the likely effects of the proposal on the environment.

The site is located in a rural area where the predominant land use is agriculture with some forestry but with forestry being predominant locally in the current case. Forestry by its nature involves afforestation, thinning, clear-felling and re-planting. Such activities are normal and not out of character visually or otherwise in an area such as that in question. Whilst visible from the local road serving the area, I consider that the trees to be felled are not of such exceptional visual significance or value as to be considered essential or vital components of the landscape. I consider that the felling and replanting proposed would not have a significant impact on the landscape of the area which is not designated of special natural beauty or as a high value landscape area in the current Co. Cork development plan. The local road onto which the lands front is also not designated a scenic route in the current Co. Cork development plan.

I consider that the extended warehousing facility on the opposite side of the local road will have a much greater landscape and environmental impact than the tree felling and re-planting now proposed. The development permitted under Cork Co. Council reference 194641 would involve building 60 additional warehouses and would result in warehouses being much closer to local road L7693. There would be a landscaped berm close to the road to provide screening. An EIAR was prepared for this development and it was subject to environmental impact assessment. I do not consider that the project in question in the current application would result in significant cumulative effects on the environment when considered with the development referred to in case 194641.

The felling will give rise to the transport of timber on the local roads. This will cause some inconvenience in the short term but this is an inevitable consequence of the

afforestation and would not of itself result in such likely significant effects on the environment as to require compliance with the full Environmental Impact Assessment process. I also consider that the tree felling and re-planting proposed, in compliance with the standard conditions referred to, would not be likely to give rise to significant effects on the environment due to water or air pollution, including any emissions which might have significant effect on climate change.

There are no National Monuments located on the project lands. The nearest such monument is a Gallán or standing stone located in forested lands a short distance to the northwest. There are also no protected structures or remains of former buildings on the lands. There are 2 monuments in the Irish Distillers warehousing complex site located on the opposite side of the local road. These are possible burial grounds. The project now in question would not impact on the monuments referred to and would not have any significant impact on cultural heritage.

I consider that the felling proposed does not come within the classes of project covered by the EU EIA Directive. I also consider that the proposed development would not be likely to give rise to significant effects on the environment of itself or cumulatively with other projects. I consider that the possibility of significant effects on the environment can be ruled out on the basis of this preliminary screening.

Overall conclusion:

I conclude that the proposed project would not be likely to have significant effects on the environment and the carrying out of EIA is not required. I also conclude that the project individually, or in combination with other plans or projects, is not likely to have any significant effect on any Natura 2000 site, having regard to the reasons for designating the sites and their conservation objectives.

Padraic Thornton

4/11/ 2020

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