



<b>Council/Committee:</b>	<b>Neighbourhoods &amp; Communities</b>
<b>Date:</b>	09 September 2025
<b>Report Title:</b>	<b>Access to Jointure Bay, Greenisland Public Consultation</b>
<b>Publication Status:</b>	Open
<b>Author:</b>	Lisa Kirkwood, Outdoor Recreation Officer
<b>Approver:</b>	John McVeigh, Acting Director of Community

## 1. Purpose

- 1.1. This report is to update Elected Members on the information gathered during the public consultation into the opening of pedestrian only access to Jointure Bay, Greenisland

## 2. Background

- 2.1. In 2020 Council were contacted by a local resident who was concerned that their daughter had been walking along the foreshore in Greenisland and had been cut off by the tide. This resulted in their daughter and her friend having to climb a gate at the access to NIW's Greenisland pumping station situated beside 103 Shore Road, Greenisland.
- 2.2. This incident raised concerns at the lack of safe public access between a lane known as The Gut at Silverstream and Trooperslane, some 2.65km as the crow flies away, see map in **Appendix 1**.
- 2.3. The access to NIW's pumping station was identified as a possibility to be opened up to the public. The lands at the pumping station, were originally owned by Council, but vested in August 1992 under the Greenisland Sewerage Order 1910 by the Department for the Environment for Northern Ireland.
- 2.4. At this time senior management had discussions with NIW, Elected Members and the then Minister for the Department of Infrastructure in relation to opening the access point here. NIW wanted Council to take on full responsibility for the lane to the pumping station and maintenance to a standard safe for their vehicles to use. Council declined to accept this as the only access required is for pedestrian access and not the full length of the access lane. As a result, negotiations halted.
- 2.5. In 2024 Council were approached by a local resident, along with their local MLA, to pursue options for additional access to the foreshore. Under the instruction of the Direct for Communities within Council negotiations



reconvened with NIW and a possible alternative was put forward. This would involve opening the gate access, erecting a fence and gate further into the lane and providing an access, possibly via steps, from the lane down to the foreshore (**Appendix 1**).

- 2.6. In order to gauge the necessity and needs of the local community it was agreed at N&C committee in April 2025 to carry out a public consultation. This was carried out by using an online form being promoted on Council's social media platforms, a maildrop to residents within 200m and advertised in local press outlets. It was brought to Council's attention that some people who live along the lough side of the Shore Road may not be aware of the consultation, so they were subsequently sent hard copies of the forms.

### **3. Key Issues for Consideration**

- 3.1. Council received 423 responses. 40 of which were opposed to opening additional access and 383 in favour of it.
- 3.2. In relation to those opposed, 31 live on the shore side of the road, 1 lives on the opposite side of the road, with the rest living elsewhere in the Greenisland/Carrickfergus area, 4 of whom are Elected Members.
- 3.3. Of those in favour of the access point, 87 live on the opposite side of the Shore Road. 229 live elsewhere in the Greenisland/Carrickfergus area. 47 within the Borough but outside of Carrickfergus wider area. 20 live along the Shore Road in Antrim and Newtownabbey Borough Council
- 3.4. The reasons for opposing the opening of the route include environmental concerns, health and safety reasons, anti-social behaviour and privacy/home security.
- 3.5. Environmental – Council commissioned an independent Habitats Regulations Assessment in 2025 (Appendix 2). The conclusion of the assessment was that there would be no significant effect on the designations.
- 3.6. Health & Safety – one of the main concerns was in relation to the area between Jointure Bay and the Gut, as well as towards Trooperslane is tidal and cuts people off very quickly. An independent risk assessment was carried out (Appendix 3). The overall conclusion is that the H&S risk of the tide can not be removed therefore Council should not proceed. However, should Council wish to open the access then there are a number of measures recommended in the report which will need to be implemented along with additional assessments to reduce the H&S risks.



- 3.7. Anti-social behaviour & Home Security – PSNI provided statistics of reported crime in the area (<https://www.police.uk/pu/your-area/police-service-of-northern-ireland/larne/?yourlocalpolicingteam=about-us&tab=crimemap>). 2 reports have been made in 2025 within 250m of the access point. 1 reported burglary and 1 anti-social behaviour.

#### 4. General Considerations / Implications

- 4.1. Financial implications – Council officers have yet to determine the overall costs for the works to be carried out. There will be some ongoing maintenance, but the cost will depend on the finishing material of the access steps.
- 4.2. Human Resources – no additional recruitment will be needed as Council Officers can work on this.
- 4.3. Equality Screening – Due to the nature of the existing access to the foreshore the access will be steps, which will limit the accessibility of certain populations within the Borough.
- 4.4. Assets – Council would take on responsibility for an additional access and need to enter into an agreement with NIW.
- 4.5. Rural Proofing and Environmental Impact – This is a semi-urban area. The access would give local residents additional access to the foreshore, which at present is limited. In relation to the environmental impact the attached HRA states that there will be no significant impact.

#### 5. Recommendation or Decision

- 5.1. Elected members are asked to;
  - (i) note the consultation responses received by Council
  - (ii) provide direction on the way forward for Officers

#### 6. Appendices / Links

Appendix 1 Design concept of the access steps

Appendix 2 Habitat Regulations Assessment

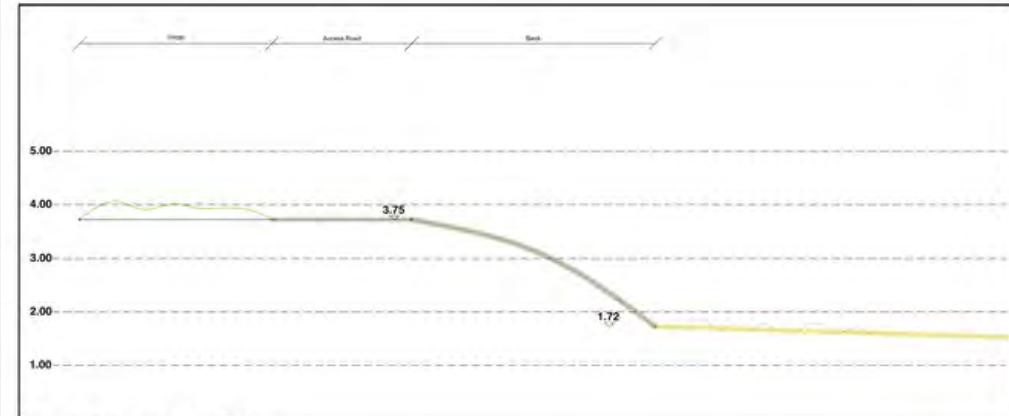
Appendix 3 Independent Risk Assessment

Appendix 4 PSNI Crime Map Statistics <https://www.police.uk/pu/your-area/police-service-of-northern-ireland/larne/?yourlocalpolicingteam=about-us&tab=crimemap>

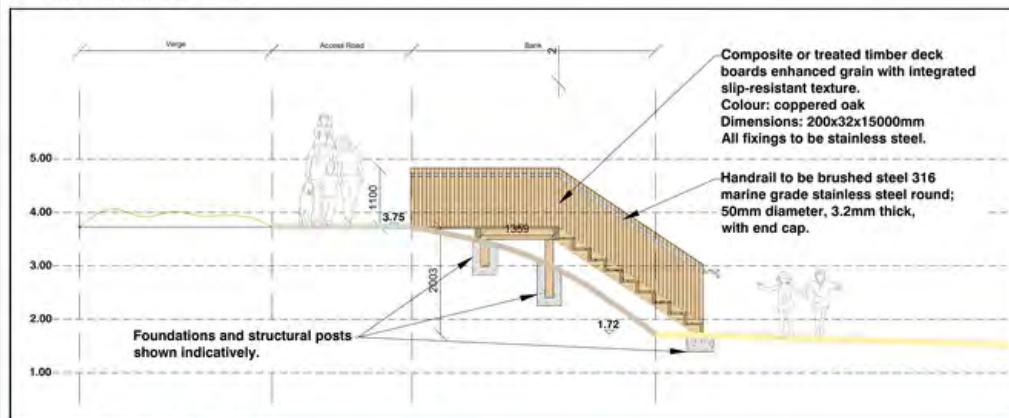


**Mid & East  
Antrim**  
Borough Council

234



Existing Section A-A - 1:50



Proposed Section A-A - 1:50



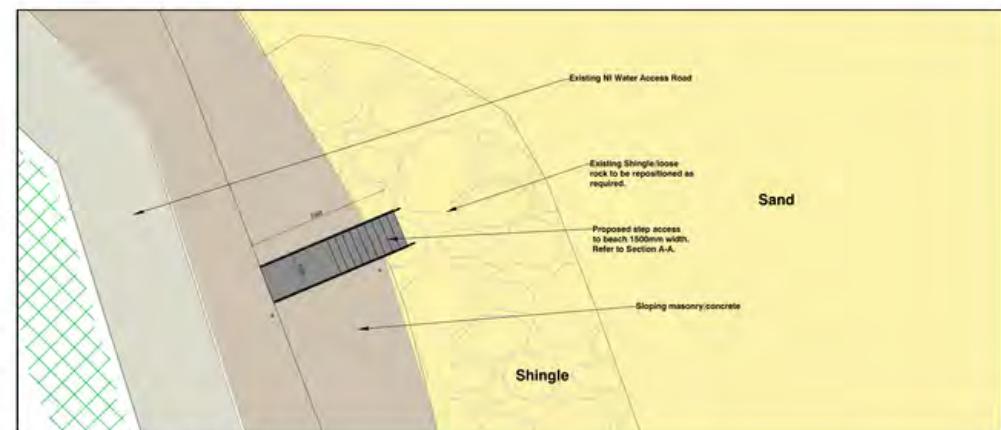
3D Visual 1 - Not to scale



3D Visual 2 - Not to scale



Proposed Block Plan 1:50



Proposed Block Plan 1:10

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**WORKS TO BE CHANGED OUT IN ACCORDANCE WITH THE CURRENT BUILDING REGULATIONS CODE OF PRACTICE, EDITION 5 (REVISION 2) AND OTHER RELEVANT CEI DOCUMENTS, INCLUDING THE STANDARDS FOR THE DESIGN AND CONSTRUCTION OF BUILDINGS**

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 Mid & East Antrim  
Borough Council of  
Antrim, New Cemetery feasibility

**Habitat Regulations Assessment Stage 1 Screening :  
Opening of access point to coastal path  
Jointure Bay, Greenisland, Belfast Lough, Co. Antrim  
Updated review August 2025**



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**For:**

**Mid and East Antrim Borough Council  
Outdoor Recreation**

**Date:**

**26/08/2025**

**Habitat Regulations Assessment Stage 1 Screening :  
Opening and development of coastal path with provision of access to beach area  
Jointure Bay, Greenisland, Belfast Lough, Co. Antrim  
Updated review August 2025**

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## **Habitat Regulations Assessment Stage 1 Screening :**

**Opening and development of coastal path with provision of access to beach area**

**Jointure Bay, Greenisland, Belfast Lough, Co. Antrim**

**Updated review August 2025**

### **Background:**

An earlier current proposal relating to the opening of an access point to an existing path at Jointure Bay, Greenisland, Co. Antrim on the shore of Belfast Lough, was assessed through the HRA process in August 2021. Subsequently, more detailed plans have been developed. Given the time that has elapsed since the original screening exercise, and the more specific plans relating to the access proposal, Mid and East Antrim Borough Council wished for a review and update of the HRA Stage 1 Screening document. This is now presented.

Given the sites position adjoining a number of Natura 2000 sites and the potential for the project to result in adverse impact on the feature species of these sites, the requirement has been identified for a Habitat Regulations Screening Assessment under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) in compliance with European Commission Habitats Directive (92/43/EEC) to assess the potential for impacts upon Natura 2000 sites.

The assessment has been commissioned by Mid and East Antrim Borough Council.

The aims of this report are:

1. Amend and update as necessary the original HRA document.
2. Confirmation of the designation (selection) features that the proposal must be screened against.
3. Identification of potential risks to the specified features and of any standard environmental precautions that may be necessary irrespective of the threat to N2K designations.
4. Provide the HRA Screening Assessment.

### **Legal Framework:**

<b>E.U. Directives</b>	
Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ('the Habitats Directive')	Provides a requirement and framework for the conservation of habitats and species identified as being of EU importance, in designated Special Areas of Conservation (SACs). Article 6 sets out Appropriate Assessment tests of the predicated effects of developments likely to impact upon SACs (and SPAs). These tests now known as a Habitat Regulations Assessment (HRA)

NB the above evaluation procedure is still in force post-Brexit.

**Survey details:**

This report is based on an additional information provided by Mid and East Antrim Borough Council. In addition a further field survey visit was undertaken which provided information to inform the HRA review and update. Additional information used is identified in the Screening section.

11/08/2021	Ian Enlander
15/08/2025	

**Statement of Authority:** Ian Enlander BSc, MSc, DIC.

Before leaving the Civil Service, Ian was senior ornithologist at NI Environment Agency, leading on Northern Ireland's statutory ornithological site designation programme (ASSI, SPA and Ramsar). He produced the conservation objectives and related documentations for the series of SPAs in Northern Ireland.

His work included assessment and evaluation of development proposals in relation to designated sites throughout Northern Ireland including HRA and related procedures.

Ian has over 30 years of organising, co-ordinating and delivering ornithological and related terrestrial and marine habitat surveys including WeBS, BBS, breeding waders, raptors, WBBS, breeding seabirds and heronries (NI coordinator for BTO).

He has been involved as a surveyor in a number of long-term ornithological surveys on Belfast Lough including BTO Wetland Birds Surveys (WeBS) and Low Tide Surveys.

Since retiring, Ian has worked with a number of ecology consultancies carrying out ornithological surveys, mainly in relation to planning applications and other development proposals.

**Statement of Objectivity:** The data have been collected and presented impartially. Payment or other favour is not dependent upon any particular planning outcome, and there is no other vested or personal interest in any particular outcome, or any commercial products mentioned.

## Site Description:

### Setting:

The proposal is for open access to an existing path off the Shore Road. The path, which currently serves a Northern Ireland Water pumping facility, is on the west side of Jointure Bay and adjoins private gardens on the inland side. A number of these gardens have access via gates on to the path while these, and other gardens associated with properties on Island Park, overlook the shoreline and Green Island. The latter site is an important high tide roost for various waterbirds outside the breeding season. Jointure Bay and adjoining inter-tidal areas provide foraging opportunities for a number of these birds.

It is understood that the proposal will not involve any construction activities with regard to the path. The path length is approximately 175m. The main development is provision of a system of wooden steps to provide access from the path to the beach i.e. ‘bridging’ the existing concrete and stone bank along the northern side of the path. Access will be open and year round. Signage will address ‘code of conduct’ as well as site H&S issues with regard to tides and other potential ‘threats.

The design for the ‘bridge’ is shown in Appendix 2.

## Consideration of Natura 2000 Designations to evaluate

A ‘rapid’ evaluation was undertaken to determine which N2K sites to include within the formal HRA screening process. Consideration was given to N2K feature relevance/vulnerability in context of the project proposal, pathways and processes between the development and each N2K site and distance between the development area and nearest point of the N2K site boundary

The project does not involve any significant discharge or alteration to natural marine or coastal processes and so any impacts will be limited to the immediate area.

For this reason, the North Channel SAC (designated solely for the Harbour Porpoise population) which includes the marine area at the mouth of Belfast Lough (from Whitehead to Orlock Point) has been excluded from the process.

Sites deemed relevant on the basis of general location, potential relevance and connectivity are shown in the table below.

Jurisdiction	Site type	Site - feature	Considerations	Outcome
Northern Ireland	Special Protection Area	Belfast Lough. Non-breeding waterbirds	Immediately adjoining area of the access point and path – inter-tidal	Include
		Belfast Lough Open Water. Non-breeding waterbirds	From low water mark seawards <100m from project area.	Include
		East Coast (Northern Ireland) Marine. Non-breeding waterbirds + marine area used by breeding Seabirds	Proposed SPA which will encompass Belfast Lough open Water hence same consideration	Include

## Natura 2000 Designations:

### Selection Features and Conservation Objectives

Natura 2000 sites are a part of an international network of sites designated to protect species and habitats identified as being at risk in Europe and the Overseas Territories of current and former EU Member States. They are therefore designated for specified species or habitats which are termed the qualifying features.

Article 2 of The Habitats Directive outlines that habitats and species qualifying Features protected by the Directive must be maintained in ‘favourable conservation status’ within their range.

The conservation status of a Habitat Feature is regarded as ‘favourable’ when:

The natural range, and area it covers within that range, is stable or increasing;

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.

Favourable conservation status of a Species Feature is normally 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 the sites natural habitats.

The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future.

There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long term basis.

To target Favourable Conservation Status, a set of conservation objectives relating to each Selection Feature has been compiled for each Natura 2000 site.

The Habitat Regulations Assessment (HRA) is undertaken to determine if the proposed development or project has the potential to impact on the Favourable Conservation Status of the selection features for the sites evaluated as set out in the sites Conservation Objectives.

### Proposed Natura 2000 sites.

Prior to the UK’s decision to leave the EU, site selection for the Natura 2000 site series was still ongoing, especially with regard to the SPA’s (Birds Directive). A series of renotifications of existing SPA’s (to update and extend as necessary selection feature) together with entirely new SPAs (based on species/aspects of life cycle not previously addressed) were at various stages of implementation. The current statutory obligations towards N2K sites still applies including the decision that planned site renotifications and additional designations, should be treated as if these planned actions had been implemented. Hence the current exercise addresses the extended site features for Belfast Lough SPA as well as the proposed marine East Coast Marine SPA (which will subsume the Belfast Lough open Water SPA as well as designating an additional marine area).

## N2K designations in relation to the proposed Jointure Bay project



**Belfast Lough SPA (UK 9020101) and Belfast Lough Ramsar (7UK117)** is a large intertidal sea lough situated at the mouth of the River Lagan on the east coast of Northern Ireland. The inner part of the lough comprises a series of sand and mudflats, shell dominated banks and artificial lagoons. The outer lough is mainly rocky shores with a number of sandy bays on the southern shore with more extensive mixed sediment intertidal areas on the northern side.

On renomination the Belfast Lough Special Protection Area boundary was unchanged. Marine areas below mean low water are not included.

The Special Protection Area boundary is entirely coincident with that of the Belfast Lough Ramsar Site. The selection features for the SPA and Ramsar designations are the same. For purposes of the HRA process, addressing the requirements for the SPA also covers those for the Ramsar site.

The principal interests are the breeding colony of Common and Arctic Tern and the wintering populations of Redshanks, Bar-tailed Godwit and Black-tailed Godwit.

Renomination dated 23<sup>rd</sup> November 2015

### Belfast Lough SPA Selection Feature and Objectives:

Feature	Component Objective
Common Tern <i>Sterna hirundo</i> (breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>Fledging success sufficient to maintain or enhance population</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Arctic Tern <i>Sterna paradisaea</i> (breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>Fledging success sufficient to maintain or enhance population</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Bar-tailed Godwit <i>Limosa lapponica</i> (non-breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Redshank <i>Tringa totanus</i> (non-breeding population) Regularly occurring migratory species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Black-tailed Godwit <i>Limosa limosa</i> (non-breeding population) Regularly occurring migratory species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>

	the species
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
Habitat Extent*	Maintain the extent of main habitat components subject to natural processes
Roost sites*	Maintain or enhance sites utilised as roosts

\* Non feature SPA Objectives

For further information see [www.daera-ni.gov.uk/publications/special-protection-area-belfast-lough](http://www.daera-ni.gov.uk/publications/special-protection-area-belfast-lough)

NB Features listed above are taken from the renomination documentation for Belfast Lough SPA – the NIEA Conservation Objectives have not been updated to reflect the additional selection features  
[www.daera-ni.gov.uk/sites/default/files/publications/doe/belfast-lough-spa-citation-documents-map.pdf](http://www.daera-ni.gov.uk/sites/default/files/publications/doe/belfast-lough-spa-citation-documents-map.pdf)

**Belfast Lough Open Water SPA (UK9020290)** comprises the marine area below the mean low water mark. Sewards it extends to a notional boundary between the eastern limits on the north and south shores of the Outer Belfast Lough Area of Special Scientific Interest at Kilroot and Horse Rock respectively. The boundary towards the head of the lough is a notional line between Greencastle on northern shore and Holywood Bank on the southern shore. Water depths within the site are generally between 1m and 10m. Shallow waters, less than 5m in depth, dominate the area with deeper waters confined to the central area of the lough, east of a line between Greenisland and Cultra.

The principal interest is the non-breeding population of Great Crested Grebe.

#### Belfast Lough Open Water SPA Selection Feature and Objectives:

Feature	Component Objective
Great Crested Grebe Podiceps cristatus (non-breeding population) Regularly occurring migratory species	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 and To ensure that the following are maintained in the long term: <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
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
Habitat Extent*	Maintain the extent of main habitat components subject to natural processes

\* Non feature SPA Objectives

For further information see [www.daera-ni.gov.uk/publications/special-protection-area-belfast-lough-open-water](http://www.daera-ni.gov.uk/publications/special-protection-area-belfast-lough-open-water)

**The East Coast (Northern Ireland) Marine proposed Special Protection Area** (not yet classified) includes coastal and near shore waters from Ringfad near Carnlough, Co. Antrim in the north, the marine area of Larne Lough, the marine area of Belfast Lough, waters around the Copeland Islands and offshore of the Ards Peninsula to Cloghan Head, near Ardglass in the south.

The proposed SPA covers a diverse range of seabed habitats, from extensive coastal fringing reefs of various lithologies to the fine silt of inner Belfast Lough.

To the north of Belfast Lough, fringing reef is notable, with substantial areas of coarse sediments and boulders and cobbles offshore from Islandmagee. Further north, towards Ballygally and Carnlough, the glacial till dominates the seabed but also with important areas harbour maeirl, a coralline algae (mostly *Phymatolithon calcareum*), known for its associated high biodiversity and for acting as a scallop nursery ground. Rippled sands and gravels are also notable between the relic drowned drumlins that are present off much of the 'Glens of Antrim' coastline. Bedrock outcrops with near vertical sides are found at the Maidens; these reefs and the surrounding sand banks form part of the designated Maidens SAC.

Within Belfast Lough muds grade into muddy sands toward the outer Lough, with extensive areas of cobbles and shell debris overlying the muddy sand. Part of the muddy sand in the outer Lough is bioturbated by Dublin Bay prawn (*Nephrops norvegicus*), and also harbour the Seapen *Virgularia mirabilis*. Topographically complex reef areas surround the Copeland Islands.

To the south of Belfast Lough, the seabed off the Ards Peninsula is dominated by stony reef and mixed sands and gravels (often with a notable silt content). The gravelly sands support commercially harvestable seed mussel in geographically limited areas (affected by local hydrography), and further offshore support a scallop fishery (*Pecten maximus*). Mobile bedforms, such as extensive sand waves and banks, are found at Rigg Bank and extending south of the bank.

Offshore of Belfast Lough and off the Maidens Islands the seabed within the site reaches a depth of 125m.

The boundary adjoins the following existing Special Protection Areas –

- Larne Lough SPA
- Belfast Lough SPA
- Outer Ards SPA
- Copeland Islands SPA
- Strangford Lough SPA

This site also subsumes the existing Belfast Lough Open Water SPA

The landward boundary for this marine area is the mean low water mark, medium tide

The principal interests are the marine area used by non-breeding populations of Red-throated Diver and Eider Duck, rafting Manx Shearwater involving breeding birds originating from the colony at Copeland Islands SPA and foraging Sandwich, Common and Arctic Tern originating from adjoining tern colonies in Larne Lough, Belfast Lough, the Outer Ards and Strangford Lough.

### **East Coast (Northern Ireland) Marine proposed Special Protection Area**

Selection Feature and Objectives:

Feature	Component Objective
Great Crested Grebe	To maintain or enhance the population of the qualifying species
Podiceps cristatus (non-breeding population)	To maintain or enhance the range of habitats utilised by the qualifying species
Regularly	To ensure that the integrity of the site is maintained;
	To ensure there is no significant disturbance of the species and
	To ensure that the following are maintained in the long term:
	<ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> </ul>

occurring migratory species	<ul style="list-style-type: none"> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Red-throated Diver <i>Gavia stellata</i> (non-breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Eider Duck <i>Somateria mollissima</i> (non-breeding population) Regularly occurring migratory species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Sandwich Tern <i>Thalasseus sandvicensis</i> (breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Common Tern <i>Sterna hirundo</i> (breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Arctic Tern <i>Sterna paradisaea</i> (breeding population) Annex I species	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> <li>• Distribution and extent of habitats supporting the species</li> <li>• Structure, function and supporting processes of habitats supporting the species</li> </ul>
Manx Shearwater <i>Puffinus puffinus</i> (breeding population) Regularly	<p>To maintain or enhance the population of the qualifying species</p> <p>To maintain or enhance the range of habitats utilised by the qualifying species</p> <p>To ensure that the integrity of the site is maintained;</p> <p>To ensure there is no significant disturbance of the species and</p> <p>To ensure that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site</li> <li>• Distribution of the species within site</li> </ul>

occurring migratory species	<ul style="list-style-type: none"> <li>Distribution and extent of habitats supporting the species</li> <li>Structure, function and supporting processes of habitats supporting the species</li> </ul>
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
Habitat Extent*	Maintain the extent of main habitat components subject to natural processes

\* Non feature SPA Objectives

For further information see [www.daera-ni.gov.uk/consultations/east-coast-northern-ireland-marine-special-protection-area-consultation](http://www.daera-ni.gov.uk/consultations/east-coast-northern-ireland-marine-special-protection-area-consultation)

## Risks to the designation features:

### Proposal Summary

The proposal is for open access to an existing path off the Shore Road. The path, which currently serves a Northern Ireland Water pumping facility, is on the west side of Jointure Bay and adjoins private gardens on the inland side. A number of these gardens have access via gates on to the path while these, and other gardens associated with properties on Island Park, overlook the shoreline and Green Island.

It is understood that the proposal will not involve any construction activities with regard to the path. The path length is approximately 175m. The main development is provision of a system of wooden steps to provide access from the path to the beach i.e. ‘bridging’ the existing concrete and stone bank along the northern side of the path. Access will be open and year round. Signage will address ‘code of conduct’ as well as site H&S issues with regard to tides and other potential ‘threats. The design for the ‘bridge’ is shown in Appendix 2.

Proposed work



## Measures within the proposal that will protect the environment

As the project is limited to provision of access via existing path and provision of a small set of wooden steps, no actions have been specified with regard to the statutory sites or the wider environment.

## Potential Pathways for Impacts upon Feature Habitats or Species

The path comes within approximately 10m of the nearest designated site (Belfast Lough SPA). However with construction activities limited to provision of a set of wooden steps and associated foundations/structural supports, there is no risk of direct impacts arising.

People using the path or accessing the beach/inter-tidal areas may be an issue in terms of disturbance of foraging birds (inter-tidal area most important outside the breeding season) and roosting birds (Green Island is a very important high tide roost for a range of waterbirds again outside the breeding season). The area is also regularly used by large numbers of Eider Duck undergoing their post-breeding moult.

The path is separated from the beach and inter-tidal areas in Jointure Bay by a section of 'informal' rock armouring (see photographs) and by the small unnamed stream. There is an existing 'rough' path leading from the project path. This is partially underwater at high tide making disturbance of roosting birds on Green Island unlikely.

It should be noted that there are existing informal access routes into the area. At low tide, the area can be reached from the Loughshore (west) area. Similarly, access via the Trooperslane/Tory Town area allows walkers to access the area via beach/ground in front of Seapark House.

See Appendix 3 for fuller assessment of use of the Jointure Bay area by SPA feature species outside the breeding season.

## Additional (non-statutory) ornithological considerations

It is understood that NIEA raised concerns about potential for impacts on breeding birds on Green Island.

Both survey dates are outside any recognised period for assessment of breeding birds (British Trust for Ornithology – BBS guidance<sup>1</sup>). A combination of personal familiarity with the site together with an assessment undertaken on the survey dates highlighted the limited potential for breeding birds to use Green Island. A significant part of the island is within the inter-tidal zone leaving a limited area exposed at high tide. This is dominated by rank grasses, reflecting the very high nitrogen inputs from roosting birds.

Only 2 potentially breeding species were noted during the surveys, Rock Pipit and Pied Wagtail. The latter included a family party (2021 visit) which may have bred locally. There was plenty of suitable nesting habitat for Rock Pipit as well so they may also have bred. Given existing access to the area together with tidal limitations, it is unlikely that the current project will alter the potential for these species to breed on Green Island. Both species are tolerant of human presence.

<sup>1</sup> <https://www.bto.org/our-science/projects/bbs/research-conservation/methodology>

## Screening

Assessment of significance may be based on a number of factors, as outlined in EC (2001). Such as:

- the character and perceived value of the affected environment;
- the magnitude, spatial extent and duration of the anticipated change;
- the resilience of the environment to cope with change; and
- confidence in the accuracy of predictions of change.

An effect is considered significant if an activity seriously disrupts the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically meaningful proportion of the population of the species.

In summary, any element of a plan or project that has the potential to affect the conservation objectives of a Natura 2000 site, including its structure and function, should be considered significant (EC, 2006).

### Potential impact : Stage 1: Test of Likely Significance

#### Natura 2000 sites at potential risk:

Belfast Lough SPA and Ramsar, Belfast Lough Open Water SPA and East Coast (Northern Ireland) Marine proposed SPA

#### Summary Description of the proposal:

- Size and scale;

The project does not involve any construction activity along the line of the existing path (approx. 175m in length). The amended proposal will comprise construction of a system of wooden steps to provide access from the path to the beach i.e. 'bridging' the existing concrete and stone bank along the northern side of the path. Access will be open and year round. Signage will address 'code of conduct' as well as site H&S issues with regard to tides and other potential 'threats'. The design for the 'steps' is shown in Appendix 2.

- Land-take;

The actual footfall within the designated site is not stated but will be of the order of 1 – 2 meters squared. This will relate to base of the steps on the beach.

- Distance from Natura 2000 site or key features of the site;

The seaward element of the steps will encroach onto the beach, by a few meters at most.

- Resource requirements (water abstraction etc);

None

- **Emission (disposal to land, water or air);**

None.

- **Excavation requirements;**

Limited excavation for step supports and selective repositioning of loose rock/shingle as required – this to provide suitable footing for the steps on to the beach.

- **Transportation requirements;**

None.

- **Duration of construction, operation, de-commissioning etc;**

No timescale provided but this is a small-scale highly localised project..

**Is the proposal directly connected with or necessary to management of the site for conservation of N2K features?**

No

**Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site as a result of\*:**

- **Habitat loss;**

Not stated but estimated at 1 -2 m<sup>2</sup>.

- **Reduction of habitat area;**

As above. Loss relates to existing area of loose rock and shingle – habitats not used by feature species.

- **Disturbance;**

The project will result in people using the path and beach area at Jointure Bay – note there is existing informal access to the area. The area would be most vulnerable to disturbance (greatest potential impact) outside the breeding season i.e. in autumn and winter when feature species use the area mainly for roosting (on Green Island) at high tide and for foraging (Jointure Bay and adjoining areas) on inter-tidal habitats as the tide permits.

Green Island is not accessible at high tide and is sufficiently distant to minimise any significant disturbance due to the relative position of the path, beach area and the island.

The island is overlooked by a private garden which is much closer to the island than the current proposal will allow for (at high tide)

Density of foraging waterbirds is relatively low in Jointure Bay (this is not an important foraging area for feature species) with areas for birds to relocate to temporarily as necessary. The feature species regularly present here include Redshank and Bar-tailed Godwit (personal observation). See Appendix 3 for further assessment of non-breeding feature (SPA) species using this area.

Moult Eider Duck flocks are susceptible to disturbance but again the relative distance from the path together with the large area used by the flocks (highly mobile and occurring anywhere from Carrickfergus to Macedon Point on the north shore and Crawfordsburn to Holywood on the southern shore) means their use of the Green Island area is not consistent.

Great Crested Grebe utilise offshore marine areas for foraging and loafing but with a limited presence in this section of the Lough.

Of the seabird species (Red-throated Diver, Manx Shearwater and Tern species) the former 2 species use offshore marine areas for foraging and rafting – this latter behaviour exhibited by Manx Shearwater in marine areas close to the Copeland Islands.

Terns will use inshore waters but the East Coast Marine pSPA should be viewed as a resource area i.e. most terns from adjoining breeding colonies are predicted to forage within the site.

Prey distribution is not associated with any particular area within the proposed marine area and is not fixed in time. As such the terns will use this as an ‘area of search’ opportunistically taking prey (principally sand eel species).

Foraging Terns are highly mobile such that any activity which causes them disturbance (which tends to be highly localised e.g. a boat moving through) are easily avoided with birds relocating to another suitable area or waiting for the disturbance to pass and resume foraging.

- **Habitat or species fragmentation;**

None

- **Reduction in species density;**

None.

- **Changes in key indicators of conservation value (e.g. water quality, climate change).**

None

### Summary assessment of Project Impacts against individual designated features

<b>Site</b>	<b>Feature</b>	<b>Comment</b>	<b>Projected Impact</b>
Belfast Lough SPA Belfast Lough Ramsar	Common Tern (breeding population) Annex I species	Refers to breeding site – Belfast Harbour area	No significant effect
	Arctic Tern (breeding population) Annex I species	Refers to breeding site – Belfast Harbour area	No significant effect
	Bar-tailed Godwit (non-breeding population) Annex I species	See Appendix 3	No significant effect
	Redshank (non-breeding population) Regularly occurring migratory species	See Appendix 3	No significant effect
	Black-tailed Godwit (non-breeding population) Regularly occurring migratory species	See Appendix 3	No significant effect
Belfast Lough Open Water SPA	Great Crested Grebe (non-breeding population) Regularly occurring migratory species	Using offshore marine area See Appendix 3	No significant effect
East Coast (Northern Ireland) Marine proposed Special Protection Area	Great Crested Grebe (non-breeding population) Regularly occurring migratory species	Using offshore marine area See Appendix 3	No significant effect
	Red-throated Diver (non-breeding population) Annex I species	Using offshore marine area See Appendix 3	No significant effect
	Eider Duck (non-breeding population) Regularly occurring migratory species	See Appendix 3	No significant effect
	Sandwich Tern (breeding population) Annex I species	Highly mobile and opportunistic foraging strategy. Adapted to short-term disturbances.	No significant effect
	Common Tern (breeding population) Annex I species	Highly mobile and opportunistic foraging strategy. Adapted to short-term disturbances.	No significant effect
	Arctic Tern (breeding population) Annex I species	Highly mobile and opportunistic foraging strategy. Adapted to short-term disturbances.	No significant effect
	Manx Shearwater (breeding population) Regularly occurring migratory species	Using offshore marine area	No significant effect

Only standard environmental protection measures built in to the proposal have been considered at this stage. No specific impact mitigation measures will be required.

<b>Describe any potential effects on the Natura 2000 site as a whole in terms of: interference with the key relationships that define the structure or function of the site</b>	<b>Effect considered significant/non-significant: Finding of No significant effects Matrix</b>
None	No significant effect

<b>Provide details of any other projects or plans that together with the project or plan being assessed could (directly or indirectly) affect the site.</b>	<b>Provide details of any likely in-combination effects and quantify their significance -</b>
It is not anticipated that the Greenisland project will have any impact on any Natura 2000 site. Given there will be no impact, then it follows that there will be no contribution to cumulative impacts.	No significant effect on N2K Features.

<b>Is the potential scale or magnitude of any effect likely to be significant?</b>	
<b>Alone?</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<b>In-combination with other projects or plans?</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

<b>List of Agencies Consulted: Provide contact name and telephone or email address.</b>	None
Above consultee response.	N/A

<b>Conclusion: Is the proposal likely to have a significant effect on an N2K site?</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
--	---

<b>IT HAS BEEN DETERMINED THAT THE PROPOSAL WILL NOT HAVE A SIGNIFICANT EFFECT</b>
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**Data collected to carry out the assessment**

<b>Who carried out the assessment?</b>	Ian Enlander
<b>Sources of data</b>	Site visit: 11 <sup>th</sup> August 2021 and 15 <sup>th</sup> August 2025 Information provided by MEA BTO website NIEA website JNCC website
<b>Level of assessment completed</b>	Stage 1 – Screening

**Additional References**

EC (2001) *Guidance on EIA Screening, June 2001* Office for Official Publications of the European Communities, Luxembourg.

EC (2006) Managing NATURA 2000 Sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/CEE Office for Official Publications of the European Communities, Luxembourg.

**Appendix 1:** Photographs2021

Access gate



View from gate towards shore



Continuation of path along Jointure Bay.



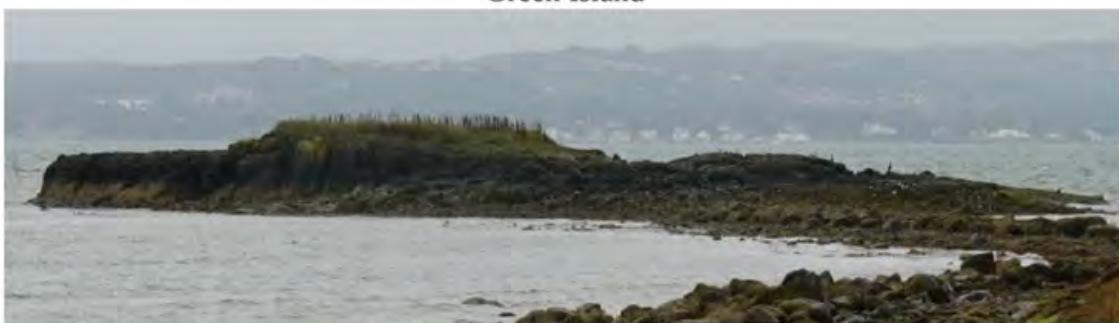
Shoreline below path towards Green Island



View east across Jointure Bay towards Seapark House



Green Island



2025

Green Island high tide



Jointure Bay high tide



View to west from Green Island area low tide



Green Island at low tide



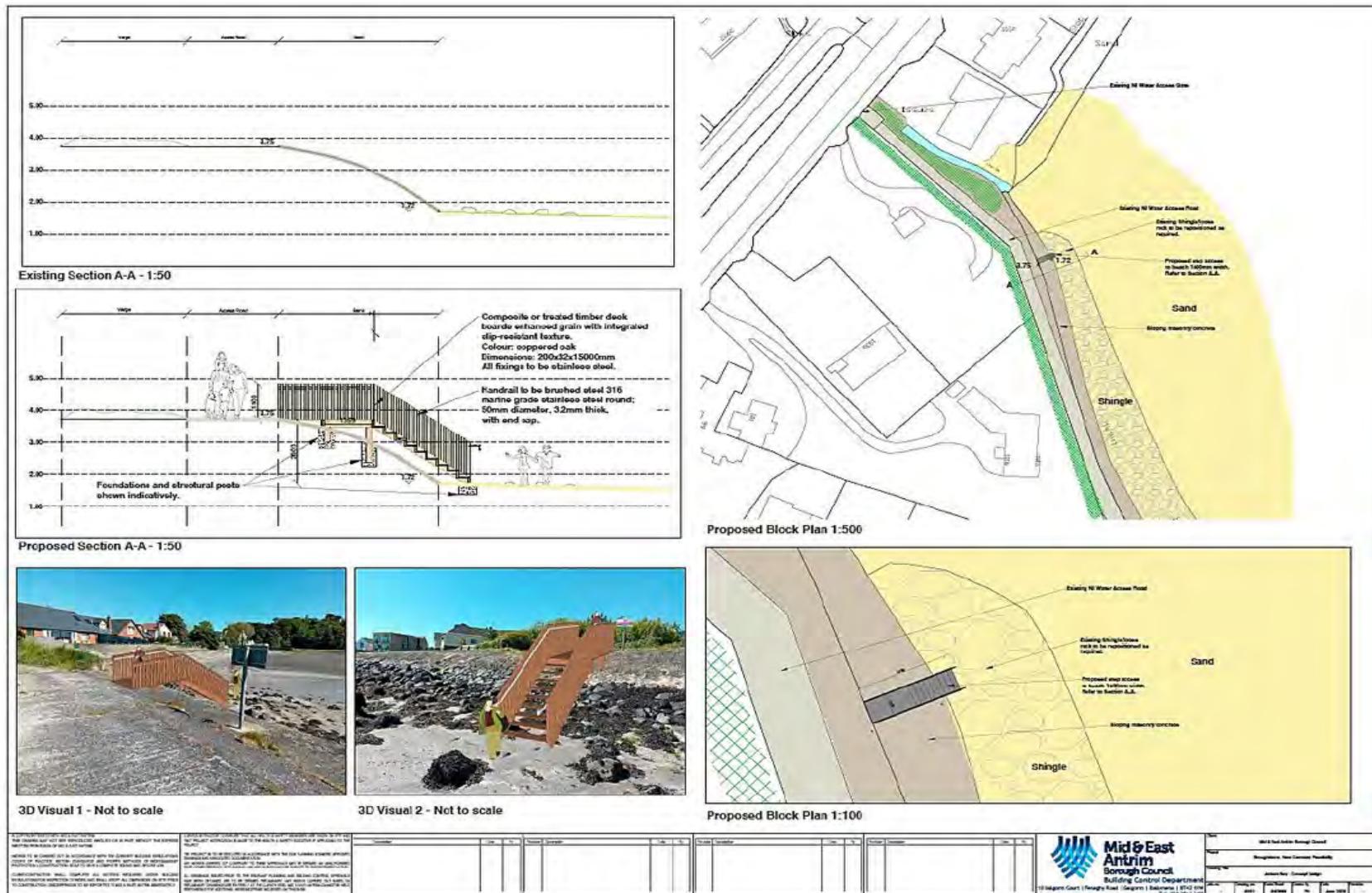
Jointure Bay low tide line of path at left



Jointure Bay view to east, low tide



## Appendix 2: development proposal design



**Appendix 3:** Utilisation of the Jointure Bay/Green Island area by non-breeding feature (SPA) species. Source: <https://app.bto.org/webs-reporting/lowtides.jsp>

Redshank distribution – BTO Belfast Lough Low Tide data – survey periods 2023/24 and 2022/23. Inset of Jointure Bay and Green Island



Black-tailed Godwit distribution – BTO Belfast Lough Low Tide data – survey periods 2023/24 and 2022/23. Inset of Jointure Bay and Green Island



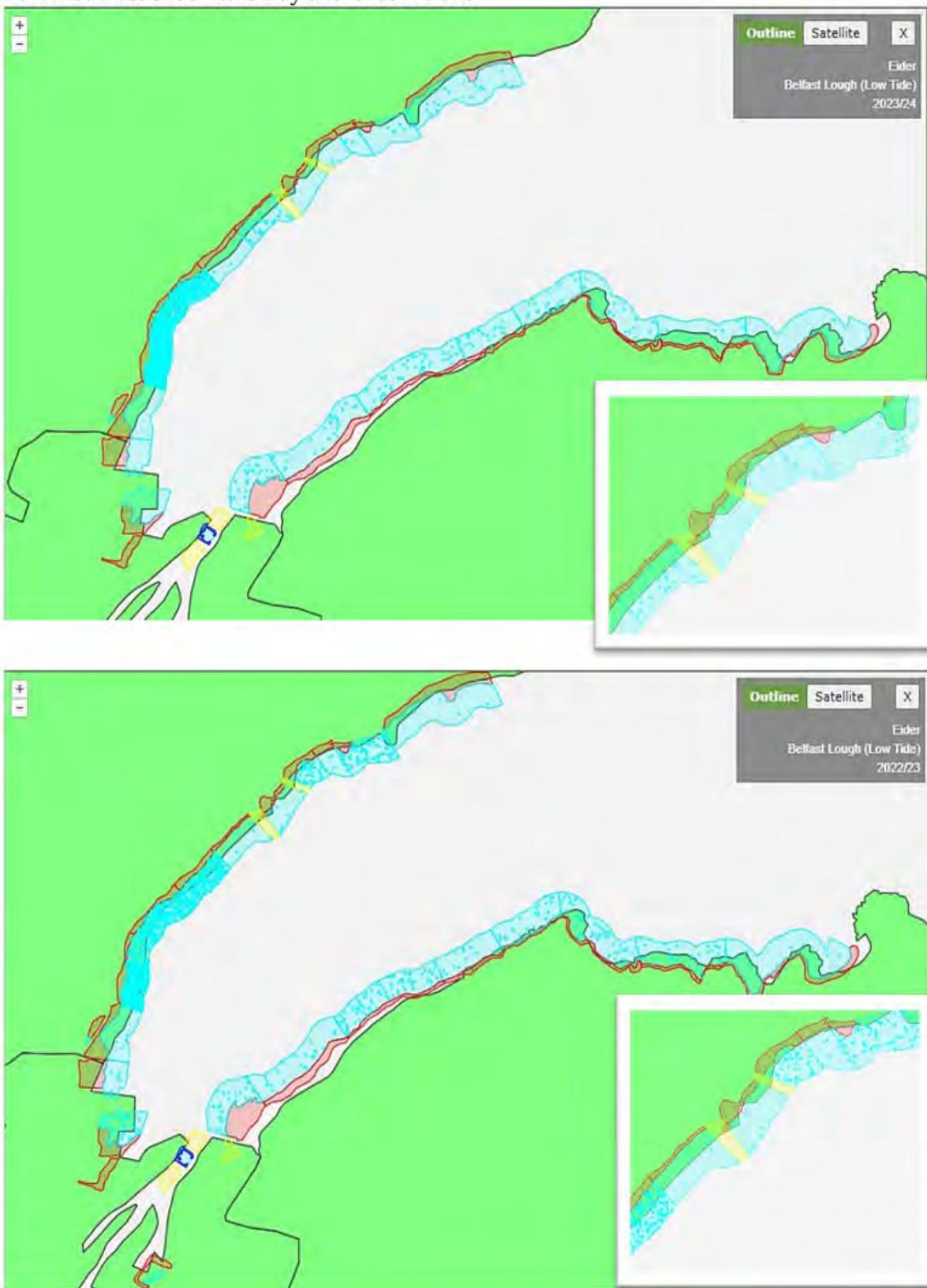
Bar-tailed Godwit distribution – BTO Belfast Lough Low Tide data – survey periods 2023/24



and 2022/23. Inset of Jointure Bay and Green Island



Eider Duck distribution – BTO Belfast Lough Low Tide data – survey periods 2023/24 and 2022/23. Inset of Jointure Bay and Green Island



Great Crested Grebe distribution – BTO Belfast Lough Low Tide data – survey periods 2023/24 and 2022/23. Inset of Jointure Bay and Green Island



Red-throated Diver distribution – BTO Belfast Lough Low Tide data – survey periods 2023/24 and 2022/23. Inset of Jointure Bay and Green Island



Assessment of non-breeding waterbird feature species based principally on Low Tide distribution data above. Comments regarding population trends are taken from BTO WeBS online data which can be found at <https://app.bto.org/webs-reporting/numbers.jsp>

Note that the BTO WeBS (high tide) and Low Tide data do not provide coverage for the breeding SPA feature species (Terns and Manx Shearwater). These species are covered under the Stage 1 Screening section in the main report.

Site	Feature	Comment
Belfast Lough SPA	Bar-tailed Godwit (non-breeding population) Annex I species	Highest numbers and density occur in Inner Belfast Lough. Birds utilise Jointure Bay area in much smaller numbers both for foraging and roosting (Green Island). Potential short-term disturbance events while foraging but extensive equivalent adjoining inter-tidal habitat available.  Site context is 25 year declines for this species across Northern Ireland and UK accepted to be changes in post-breeding migratory distributions related to climate change.
	Redshank (non-breeding population) Regularly occurring migratory species	Highest numbers and density occur in Inner Belfast Lough on the north shore area east of Seapark (Troopers Lane). Birds utilise Jointure Bay area in smaller numbers both for foraging and roosting (Green Island). Potential short-term disturbance events while foraging but extensive equivalent adjoining inter-tidal habitat available.  Site context is 25 year declines for this species across Northern Ireland and UK accepted to be changes in post-breeding migratory distributions related to climate change.
	Black-tailed Godwit (non-breeding population) Regularly occurring migratory species	Highest numbers and density occur in Inner Belfast Lough. Birds appear to rarely utilise Jointure Bay area. Potential short-term disturbance events while foraging but extensive equivalent adjoining inter-tidal habitat available.  Site context is 25 year increase for this species across Northern Ireland and UK but with more recent declines across both regions causes of which are unclear. Some evidence of this species using other sites in Northern Ireland to a greater extent.
Belfast Lough Open Water SPA	Great Crested Grebe (non-breeding population) Regularly occurring migratory species	Principally using open water in the Inner Belfast Lough area. Limited use of waters off the Jointure Bay area. An offshore species.  Site context is 20 year declines for this species across Northern Ireland and UK with some indications of a slight increase in numbers more recently. Reason for

		decline at site and wider scales are unknown.
East Coast (Northern Ireland) Marine proposed Special Protection Area	Great Crested Grebe (non-breeding population) Regularly occurring migratory species	As above
	Red-throated Diver (non-breeding population) Annex I species	Not well represented by shore based survey methods – have been shown to mainly use mid-lough waters from Carrickfergus to the mouth of Belfast Lough. Limited use of waters off the Jointure Bay area. An offshore species. Site context is 20 year declines for this species across Northern Ireland and UK with some indications of a slight increase in numbers more recently. Reason for decline at site and wider scales are unknown.
	Eider Duck (non-breeding population) Regularly occurring migratory species	Principally using open water in the Inner Belfast Lough area (main flocks off Loughshore and Whiteabbey areas) and much of the Co. Down shoreline. Significant numbers often off the Carrickfergus – Kilroot shore. Small numbers in the Jointure Bay – Green Island area. The nearshore waters around Green Island (but not exclusively) is an important moulting area post-breeding. Timing of this (mid – late summer) means their distribution is not captured by the WeBS and Low Tide surveys (September – March). The moulting flock is highly mobile (personal observation) so not tied specifically to the Green Island area. Belfast Lough hosts the largest non-breeding population of Eider Duck in Northern Ireland and in all-Ireland. Following a major increase in population in Belfast Lough, numbers are now relatively stable.



## Risk Assessment & Feasibility Assessment

### Greenisland Proposed Access

Visited by:	Jamie Cooper Donnelly Safety Services Ltd	Signature:		Date:	20/08/2025
Written by:	Jamie Cooper Donnelly Safety Services Ltd	Signature:		Date:	20/08/2025

Date for review: This report should be reviewed within 12 months or sooner if additional risks not covered are identified.

DATE – 20.08.25

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## 1 Review and Amendment List

Amendment Client Name (Taken Out)e:	By	Date

## 1.1 Executive Summary

Mid & East Antrim Borough Council (MEABC) requested Donnelly Safety Services Ltd to carry out an independent health and safety risk assessment on the feasibility of opening an additional public access point to the Belfast Lough foreshore at Greenisland, near //yarn.juggled.tumblers (What3Words).

The purpose of this review was to consider the potential benefits, risks, and control measures associated with developing such an access, and to advise whether it would be sensible to proceed from a health and safety standpoint.

### 1.1.1 Key Findings

- **Tidal Hazards:** The Belfast Lough foreshore is characterised by a wide tidal range and a fast-moving incoming tide. There is a real risk of members of the public becoming cut off if they are unfamiliar with tidal conditions. The nearest alternative exit points are more than 1 km away, which means formal retreat routes are limited once the tide begins to return.
- **Infrastructure Constraints:** While the access road at //yarn.juggled.tumblers (What3Words) provides a potential route to the shore, it also serves Northern Ireland Water's pumping station at //climate.brief.crunching (What3Words). Without suitable segregation and barriers, public access could interfere with operational requirements or pose additional security risks.
- **Environmental Sensitivity:** Increasing footfall onto the foreshore carries the likelihood of habitat disturbance, erosion, and potentially irreversible environmental damage.
- **Social Considerations:** There is a credible risk of antisocial behaviour such as littering, fires, and misuse of the area, particularly during unsupervised/low footfall evening use.

### 1.1.2 Arguments in Favour

Opening the access could bring benefits by formalising existing informal entry points, improving community access, supporting recreation, and providing an additional point of reference for emergency response. With carefully designed infrastructure (steps, fencing, signage, handrails), some of the hazards could be reduced compared to unmanaged access.

### 1.1.3 Arguments Against

The overriding concern remains the tide. Unlike other risks, which can be managed through engineering or signage, the speed and extent of the incoming tide cannot be controlled. Once individuals are cut off, they may face serious danger with limited opportunities for escape. This presents an ongoing and unremovable hazard. Coupled with the environmental sensitivity of the foreshore and potential for antisocial behaviour, the overall risk profile remains high.

### 1.1.4 Controls if Proceeding

Should the Council decide to move forward despite the identified concerns, it would be essential to implement a package of robust measures, including:

#### 1.1.4.1 Physical Safety Measures

- Vehicle barriers to restrict general traffic but allow NI Water access.
- High fencing (20–30m away from the pumping station in its current position) to segregate the pumping station from public access.
- A purpose-built stairway with handrails to provide safe descent to the foreshore.
- Clearing and levelling of the foreshore immediately at the stair base to reduce slips, trips, and falls in line with required permissions.
- Handrail along the access road wall to protect against falls.

#### 1.1.4.2 Information & Signage

- Prominent signage at the access point warning of:
  - Tidal ranges and the speed of the incoming tide.
  - Distances to alternative exit points (>1 km).
  - General hazards (slips, mud, unstable ground, currents).
- Emergency information signage with What3Words location and emergency contact guidance.

#### 1.1.4.3 Surveys & Assessments

Prior to any construction or opening, a number of surveys should be undertaken to ensure risks and impacts are fully understood:

- Tidal Risk Assessment – to model tide ranges, cut-off risks, and safe periods of access.
- Hydrodynamic/Current Flow Survey – to confirm whether dangerous currents exist near the proposed access point.
- Geotechnical Survey – to assess ground stability, erosion potential, and suitability for construction works.
- Environmental Impact Assessment (EIA) or Habitat Survey – to understand the effect of increased footfall on sensitive coastal habitats, wildlife, and protected species.
- Structural/Engineering Survey – to determine feasibility and safety of installing steps, fencing, and handrails.
- Crime Prevention Through Environmental Design (CPTED) Review – to consider measures against any possible antisocial behaviour, security of NI Water assets, and site misuse.

#### 1.1.4.4 Management Controls

- Regular inspection and maintenance schedule for all installed structures and signage.
- Time based restrictions on access (e.g., closure during darkness or adverse weather).
- Engagement with NI Water regarding operational access and asset protection.
- Ongoing liaison with emergency services to ensure rescue feasibility and inclusion of the site in local response planning.

DATE – 20.08.25

### 1.1.5 Overall Conclusion

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From a health and safety perspective, the preferred course of action is **not to proceed** with developing this access point, as the tidal hazards represent a significant, ongoing, and unmanageable risk to members of the public.

If Council wishes to proceed on wider community or amenity grounds, it must be recognised that these risks cannot be eliminated, only reduced. Full implementation of the recommended control measures, together with active liaison with NI Water, emergency services, and environmental stakeholders, would be essential.

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### 3. Introduction

Mid & East Antrim Borough Council (MEABC) is exploring the possibility of opening an additional public access point to the Belfast Lough foreshore at Greenisland, near //yarn.juggled.tumblers. Donnelly Safety Services Ltd has been asked to carry out an independent health & safety risk assessment and provide advice on the feasibility of this proposal.

This report considers:

- **The potential risks and hazards** associated with a new access point.
- **Arguments in favour** of developing the access.
- **Arguments against** proceeding.
- **Possible control measures** should the Council decide to progress.
- **A reasoned recommendation** from a health & safety perspective.

#### Disclaimer

This Risk Assessment is based on information gathered during the site visit from observations at the Greenisland location, documents reviewed and from conversations with people during the area visit. The risk assessment only covers the areas and activities as detailed within the report.

The Risk assessment report has been produced in good faith by a Donnelly Safety Services consultant, familiar with the risk assessment process and competent to assess the associated risk and activities, when working in conjunction with Company employees and other competent people, as necessary. However, there is no guarantee that inspectors with statutory powers will not find other non-compliant issues.

Although Donnelly Safety Services are competent to undertake the risk assessment; the Acts, the Regulations and the Approved Codes of Practice can only be authoritatively interpreted by the courts of law.

## Risk Assessment: Mid &amp; East Antrim Borough Council

DATE – 20.08.25

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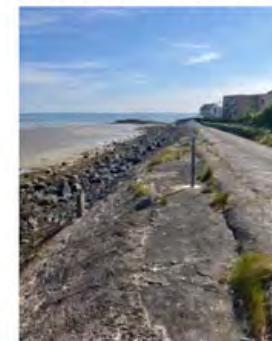
Site Plan;



Entry Point to Proposed Access Road



Shorefront perspective &amp; Beach / Access Perspective



Northern Ireland Water Pumping Station



## 4 Risk Assessment with Methodology

### 4.1 Risk Assessment Methodology

Risk Assessment requirements are based on established risk assessment principles for management of significant hazard in order to maintain a safe system of work for all relevant persons. This is a systematic process and entails key steps. The emphasis is on identifying significant hazards that might cause harm and taking appropriate measures to eliminate or reduce the risk.

Hazard	Who may be harmed	Risk description	Existing controls	Further actions required	L	S	Residual Risk
Rapid incoming tide / tidal cut-off	General public, children, dog walkers, anglers	Users trapped on foreshore by fast rising tide, no safe retreat (>1 km to other exits), potential drowning	None at present	Tidal risk survey; clear warning signage; signage showing tide times; education campaigns; restrict access at certain times; consider tide-gated access	4	5	20 (VII)
Strong currents / sudden depth changes	Bathers, children, anglers	Entrapment, drowning due to currents or sudden seabed drop-offs	None	Hydrodynamic survey; signage warning of currents and not suitable for swimming	3	5	15 (VH)
Slips, trips, falls (algae, wet rocks, uneven foreshore)	All users	Broken bones, head injury, sprains	None	Designated stairway with handrails; clear landing area at base; regular inspection; anti-slip surfacing	4	3	12 (H)
Falls from access road wall	Walkers, children	Risk of fall from height leading to injury	Existing wall	Install handrail/barrier; signage warning of fall risk	3	4	12 (H)
Access road misuse by vehicles	Pedestrians	Collision or near miss with vehicles	Currently open	Install removable vehicle barrier; design for NI Water authorised access only	2	5	10 (H)
Public access to NI Water pumping station	Public, NI Water staff	Trespass, security risks, potential interference with infrastructure	None	20–30m of high fencing; liaison with NI Water; secure gated access	3	4	12 (H)
Antisocial behaviour (fires, drinking, littering, vandalism)	Public, council, environment	Fires, broken glass, damage to infrastructure, intimidation of other users	None	CPTED review; lighting; signage; council/community patrols; bins and regular cleaning	3	3	8 (M)
Environmental damage (erosion, habitat loss, disturbance of wildlife)	Local ecology, wider community	Irreversible loss of habitats, damage to foreshore ecology	None	Environmental survey; seasonal access restrictions; protective fencing in sensitive areas; awareness signage	3	4	12 (H)
Lack of emergency access / response delays	Stranded users, emergency services	Injuries escalated by slow response; difficulty reaching casualties	Limited road access	Emergency services consultation; ensure road allows emergency vehicle access; signage with What3Words	3	5	15 (VH)
Night-time access / poor visibility	Public	Trips, falls, unsafe behaviour, crime	None	Lighting or restricted hours; signage warning of dangers in dark	3	3	8 (M)
Weather exposure (storm surge, high winds, icy surfaces)	All users	Sudden risk of waves, flooding, slips	None	Restrict access in severe weather; inspect for ice/algae; provide warning signage	3	4	12 (H)
Overcrowding / high footfall	Public	Pressure on infrastructure; accidents on narrow stairs/pathways	None	Capacity assessment; wide stair design; handrails both sides; flow management	2	3	8 (M)

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Lack of lifesaving equipment	Public	Delay in rescue if fall into water	None	Install throwlines and lifebuoys; regular inspection and replacement	2	5	10 (H)
Construction/installation hazards (if project proceeds)	Contractors, public	Injuries during works (falls, plant, lifting)	None	CDM compliance; construction-phase risk assessment; barriers during works	3	4	12 (II)

#### 4.2 Conclusion

The assessment highlights that the dominant hazard is tidal entrapment, which carries a very high residual risk even with mitigations. While many risks can be reduced through design, signage, and management, the tidal hazard cannot be eliminated and will remain the key limiting factor.

From a strict health & safety perspective, the safest course of action is not to proceed with developing the new access point. If the Council chooses to progress for amenity reasons, all recommended surveys, engineering solutions, and management measures must be implemented, with clear public communication that risks remain present and cannot be fully controlled.

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#### 4.2.1 Risk Evaluation

##### Risk Value Matrix

LIKELIHOOD (L)	VALUE	SEVERITY OF OUTCOME (S)
Negligible	1	Negligible
Low	2	Slight damage to property Minor injury (cuts/bruises)
Medium	3	Moderate damage to property Injury to occupants – medical attention required
Significant	4	Large scale damage to property Occupants require hospitalisation
High	5	Major loss of property Loss of life



Note: Beware of low likelihood but high severity

RISK RATING	ACTION
1 – 5	Record findings; review in twelve months
6 – 12	Risk should be reduced where reasonably practicable
15 – 25	Stop! Implement additional controls immediately.

#### 4.3 Introduction

Mid & East Antrim Borough Council (MEABC) is exploring the possibility of opening an additional public access point to the Belfast Lough foreshore at Greenisland, near ///yarn.juggled.tumblers (What3Words). Donnelly Safety Services Ltd has been asked to carry out an independent health & safety risk assessment and provide advice on the feasibility of this proposal.

This report considers:

- **The potential risks and hazards** associated with a new access point.
- **Arguments in favour** of developing the access.
- **Arguments against** proceeding.
- **Possible control measures** should the Council decide to progress.
- **A reasoned recommendation** from a health & safety perspective.

#### 4.4 Site Context

The proposed location for an additional access point to the Belfast Lough foreshore lies at ///yarn.juggled.tumblers (What3Words), accessed from Shore Road in Greenisland. The foreshore in this area is characterised by:

- **Wide tidal range** – Belfast Lough has a significant tidal movement, with the waterline retreating hundreds of metres at low tide before rapidly advancing again as the tide turns. This creates both opportunities for public access and significant safety hazards.
- **Foreshore composition** – The beach area consists of a mixture of mud, sand, rocks, and marine vegetation (including algae and seaweed), creating uneven and potentially slippery surfaces. Areas of soft mud pose entrapment risks, while rocks increase trip and fall hazards.
- **Access road and infrastructure** – The access route runs alongside a wall leading to a ramp that currently provides operational access for Northern Ireland Water (NI Water) to its pumping station, located at ///climate.brief.crunching (What3Words). This road is not currently designed for general public use.
- **Neighbouring access points** – The only existing foreshore access points are located at the far north-east and south-west ends of Shore Road, each more than 1 km away from the proposed site. Once on the foreshore, individuals caught by the incoming tide would find it extremely difficult to reach these exits in time.
- **Local use and interest** – The foreshore is used by walkers, anglers, and families, though access is currently limited. Informal attempts to reach the foreshore are already made in some areas, suggesting a demand for access.

In summary, the site provides a potentially attractive opportunity for local amenity, but is constrained by natural hazards (tides, surface conditions) and operational infrastructure (NI Water pumping station).

## 4.5 Arguments in Favour of Proceeding

### 1. Improved Accessibility for the Community

- A formalised access point would provide a safe, structured route to the foreshore for local residents, families, anglers, and recreational users.
- At present, access is inconvenient and distant. The new point would improve inclusivity and encourage healthy, outdoor activity.

### 2. Health, Wellbeing, and Social Benefits

- Access to natural environments such as the foreshore supports physical exercise, mental wellbeing, and opportunities for education about local ecology.
- Providing a safe, accessible area could strengthen community ties and encourage responsible use of the coastal environment.

### 3. Tourism and Economic Potential

- Additional access could increase the attractiveness of Greenisland as a destination for visitors.
- Local businesses (cafés, shops, services) may benefit from increased footfall.

### 4. Formalising Informal Access

- Some members of the public are already seeking ways onto the foreshore via informal and unsafe routes. Formalising access with engineered steps, handrails, and signage would reduce the risks associated with such unmanaged behaviour.

### 5. Emergency Services Reference Point

- A designated, clearly signed access point with a What3Words reference would make it easier for emergency responders to locate and reach incidents, compared with unmarked or informal paths.

### 6. Opportunity for Positive Environmental Education

- With appropriate signage, the access could also act as an educational point for the public on the importance of tidal safety, coastal ecology, and responsible use of natural resources.

## 4.6 Arguments Against Proceeding

### 1. Tidal Hazards

- The single most significant risk is the tidal behaviour of Belfast Lough. The tide comes in rapidly, and the flat, expansive foreshore means water can cut off users quickly.
- Once cut off, individuals may face deep, cold, and fast-moving water with no immediate escape route. This creates a very high risk of drowning, particularly for untrained or unaware members of the public.
- Other existing access points (>1 km away) are not realistically usable in an emergency.

### 2. Environmental Sensitivity and Potential Irreversible Damage

- The foreshore is an ecologically sensitive environment. Increased public use may disturb birdlife, damage habitats, and accelerate erosion.
- Heavy footfall could cause permanent degradation, particularly in muddy or vegetated areas, leading to ecological loss.

### 3. Antisocial Behaviour and Security Concerns

- Opening up a secluded access may encourage antisocial behaviours such as drinking, fires, littering, vandalism, or inappropriate use of the NI Water infrastructure.
- This could increase council maintenance costs and create community safety concerns.

### 4. Maintenance and Long-Term Liability

- Once opened, MEABC would assume legal responsibility for the access point.
- The site would require regular inspection, cleaning, and repairs to keep it safe.
- Signage, lifesaving equipment, handrails, and fencing all create recurring costs and liability exposure if not properly maintained.

### 5. Conflict with NI Water Operations

- The pumping station is critical infrastructure. Increased public access close to this facility could create security risks, obstruct NI Water vehicles, or result in unauthorised access to restricted areas.

### 6. Residual Unmanageable Risk

- Unlike slips, trips, or falls, which can be reduced through design, **the speed and extent of the tide cannot be controlled or eliminated**. Even with strong signage and warnings, some members of the public may underestimate or ignore the danger, leaving a permanent residual hazard.

## 4.7 Proposed Control Measures

If the Council decides to proceed, a robust package of engineering, informational, and management controls would be essential. These should include:

### 4.7.1 Engineering and Physical Controls

- **Vehicle Barriers:** Install lockable/removable bollards or gates at the top of the access road. These should prevent unauthorised vehicle entry while allowing NI Water emergency access when required.
- **High-Sided Fencing:** Erect 20–30m of secure fencing along the access road prior to the pumping station to segregate the public from NI Water infrastructure and prevent trespass.
- **Purpose-Built Stairway:** Construct a dedicated stairway from the access point to the foreshore. Steps should be of durable, non-slip material with contrasting nosings for visibility.
- **Handrails:** Install robust handrails along both the new stairway and the access road wall to protect against falls.
- **Beach Landing Area:** Clear and level the immediate area where the stairs reach the foreshore to create a safe landing zone free from loose rocks or trip hazards.
- **Lifesaving Equipment:** Provide throwlines and lifebuoys at strategic points, inspected and maintained regularly.

#### 4.7.2 Signage and Information

- **Tidal Hazard Warnings:** Prominent, clear signage at the top of the access road highlighting the speed of the incoming tide, risk of cut-off, and distances to alternative exits.
- **Emergency Information:** Display What3Words location, grid reference, and instructions for contacting emergency services.
- **Behavioural Signage:** Reminders on responsible use — e.g., no fires, no alcohol, take litter home.
- **Educational Messages:** Panels explaining the ecological sensitivity of the foreshore and importance of protecting habitats.

#### 4.7.3 Required Surveys Before Construction

- **Tidal Risk Assessment** to confirm frequency and likelihood of cut-off.
- **Hydrodynamic Survey** to identify current strength and water depth risks.
- **Geotechnical Survey** to check ground stability for stair and fence installation.
- **Environmental Impact Assessment (EIA)** or habitat survey to identify protected species or areas requiring conservation.
- **Structural/Engineering Survey** of access road and existing wall.
- **CPTED Review** (Crime Prevention Through Environmental Design) to minimise antisocial behaviour.

#### 4.7.4 Management and Operational Controls

- **Regular Inspection and Maintenance Programme:** Schedule routine checks of barriers, fencing, signage, stairs, and lifesaving equipment.
- **Restricted Access During Adverse Conditions:** Consider closing access during severe weather, storms, or extreme tides.
- **Community Engagement and Awareness Campaigns:** Work with local schools, clubs, and residents to educate on tidal risks.
- **Emergency Service Liaison:** Ensure local fire, ambulance, and RNLI services are briefed on the new access and included in planning for emergency response.
- **Environmental Management Plan:** Define limits on use, seasonal restrictions (if required), and monitoring of habitat condition.

## 4.8 Conclusions and Recommendations

### 4.8.1 Conclusions

Following the site inspection and risk assessment of the proposed foreshore access point at Greenisland (//yarn.juggled.tumblers), it is clear that the project presents both potential benefits and significant risks.

On one hand, providing an additional access point could improve community amenity, support health and wellbeing objectives, reduce informal unsafe access, and create a defined location for emergency services. With carefully designed infrastructure, some hazards such as slips, trips, and falls could be reduced to a manageable level.

However, the dominant risk that cannot be fully controlled is the tidal hazard. The foreshore at Belfast Lough is subject to a rapid incoming tide with a wide tidal range. Individuals unfamiliar with local conditions could easily be caught unaware, and once cut off, escape options are extremely limited as alternative access points are more than 1 km away. This risk carries the potential for fatal consequences and, critically, it is not possible to eliminate the hazard through engineering or signage. At best, the risk can only be communicated and partially mitigated.

Additional concerns include:

- The potential for **irreversible environmental damage** caused by concentrated public footfall in an ecologically sensitive area.
- The likelihood of **antisocial behaviour** if the site becomes an unsupervised gathering point.
- The challenge of **long-term maintenance and liability**, as MEABC would become legally responsible for the upkeep of all safety infrastructure, signage, and lifesaving equipment.
- The **operational implications for NI Water**, who require reliable access to the nearby pumping station and whose infrastructure may be exposed to public interference without robust segregation.

From a health and safety standpoint, these combined risks, and in particular the tide-related hazard, weigh heavily against the proposal.

### 4.8.2 Recommendations

#### 1. Preferred Option – Do Not Proceed

- From a strictly health and safety perspective, the preferred recommendation is **not to proceed with developing this additional access point**.
- The tidal hazard alone represents a **Very High Risk (RR = 20)** in the risk assessment, with a credible risk of drowning that cannot be reduced below High even with significant interventions.
- This leaves the Council with an unavoidable residual risk that could expose both the public and the Council to serious consequences.

## 2. If Council Chooses to Proceed

Should the Council wish to progress for wider community, social, or strategic reasons, it must be recognised that:

- The tidal risk will remain present at all times. It cannot be engineered away and will rely on signage, awareness, and individual decision-making.
- A full package of control measures must be implemented, including:
  - Secure vehicle barriers and segregation fencing to protect NI Water infrastructure.
  - A purpose-built stairway with handrails and a safe landing area.
  - Prominent warning and educational signage.
  - Installation of lifesaving equipment.
  - An agreed inspection and maintenance programme.
- A series of technical surveys (tidal, hydrodynamic, geotechnical, environmental, engineering, and CPTED) must be completed prior to any construction to validate feasibility and minimise secondary risks.
- Ongoing engagement with NI Water and emergency services will be essential to ensure operational compatibility and emergency readiness.

## 3. Alternative Approaches to Consider

- Instead of developing a new access, MEABC may wish to enhance existing foreshore access points at the north-east and south-west ends of Shore Road. These locations, though further apart, are already in use and may be more suitable for investment in improved safety measures.
- An alternative option is to create a managed viewpoint at //yarn.juggled.tumblers, allowing people to experience the foreshore visually without direct access to tidal areas.

### 4.8.3 Final Position

From a health and safety consultancy perspective, it is our professional opinion that the risks associated with tidal entrapment at this location outweigh the benefits of creating a new access point. While there are community arguments in favour of increased accessibility, the inability to control or eliminate the tide means that a serious, foreseeable hazard would remain inherent in the project.

If the Council wishes to proceed for wider policy reasons, it must accept that this will involve significant capital investment, ongoing management costs, and an enduring residual risk to members of the public. In such a case, the full suite of control measures and surveys identified in this report should be treated as mandatory before access is opened.