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PROPOSED DEVELOPMENT OF LOCK ROAD TRAVELLER ACCOMMODATION AT ADAMSTOWN ROAD, DUBLIN 22

Appropriate Assessment Screening Report

Prepared for:

South Dublin County Council

SDCC
Comhairle Contae Átha Cliath Theas
South Dublin County Council

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Abstract: This document is to inform the Competent Authority in carrying out their statutory obligations relating to the Habitats Directive requirement for Appropriate Assessment for plans and projects seeking consent. Appropriate Assessment is required under Article 6 (3) of the Habitats Directive for any project or plan that may give rise to significant effects on a European (Natura 2000) site.

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1. INTRODUCTION

Fehily Timoney and Company (FT) was commissioned by South Dublin County Council (SDCC) to prepare an Appropriate Assessment (AA) Screening Report for a proposed development at Adamstown Road, Dublin 22. within the townlands of Grange and Milltown, Co. Dublin. The proposed development will comprise:

1. The demolition of an existing halting site known as 'Rock Road Mansions, Lucan, Co. Dublin', and,
2. The development of a new Traveller accommodation group housing scheme, to be known as 'Lock Road, Grange Castle west, Lucan, Co. Dublin'), and supporting infrastructure.

The above is collectively referred to as the 'proposed development' or the 'project'. Where appropriate, references will be made to the 'proposed Lock Road development' for the proposed Traveller Accommodation or 'Rock Road Mansions' for the element of the existing development proposed for demolition.

This report presents an examination of whether the proposed works are likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is based on best available scientific knowledge. This report has been prepared to inform the competent authority in completing their statutory obligations in relation to Appropriate Assessment, as required by Article 6(3) under Council Directive 92/43/EEC (Habitats Directive)[1].

1.1 Legislative Context

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive)[2] provides legal protection for habitats and species of European importance. The Directive requires that where a plan or project is likely to have a significant effect on a European Site, while not directly connected with or necessary to the nature conservation management of the site, it will be subject to 'Appropriate Assessment' to identify any implications for the European site in view of the site's Conservation Objectives. Specifically, Article 6(3) of the Habitats Directive states:

> *"6(3) Any plan or project not directly connected with or necessary to the management of the site (Natura 2000 sites) but likely to have significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."*

[1] European Commission. (2021). Commission notice- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (Issue 2021/C 437/01).
[2] European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive).

The competent authority must carry out a screening for appropriate assessment to assess, in view of best scientific knowledge, if the proposed project, individually or in combination with another plan or project is likely to have a significant effect on a European site. If it cannot be excluded, on the basis of objective information, that the proposed project, individually or in combination with other plans or projects, will have a significant effect on a European site, an appropriate assessment of its implications for the European Site(s) in view of the Site's conservation objectives is required to be carried out.

The provisions of Article 6(3) do not apply where the proposed plan or project is 'connected with or necessary to the management of the site'. In this case, the proposed project is not directly connected with or necessary to the management of any European site(s).

1.2 Methodology

1.2.1 Guidance

The assessment was conducted in accordance with the following guidance:

- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Commission Notice (2021) Brussels, 28.9.2021 C(2021) 6913 final (European Commission, 2021)[3].
- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin (2009, updated 2010) (Environment Heritage and Local Government, 2009)[4].
- Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC. European Commission (2019). Brussels, (2019/C 33/01). OJ C 33, 25.1.2019[5].
- Interpretation Manual of European Union Habitats. Version EUR 28. (European Commission, 2013)[6].
- OPR Practice Note PN01 Appropriate Assessment Screening for Development Management, (Office of the Planning Regulator, 2021)[7].

[3] European Commission. (2021). Commission notice- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (Issue 2021/C 437/01).
[4] Environment Heritage and Local Government. (2009). Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities.
[5] European Commission. (2019). Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC.
[6] European Commission. (2013). Interpretation Manual of European Union Habitats. EUR 28.
[7] Office of the Planning Regulator. (2021). OPR Practice Note PN01. Appropriate Assessment Screening for Development Management.

1.2.2 Desktop Assessment

In December 2025, a desk study was carried out to collate available information on the existing natural environment at the project location. This comprised a review of the following publications, data and datasets:

- Environmental Protection Agency (EPA) (on-line map-viewer including the Appropriate Assessment Tool);
- National Parks and Wildlife Service – online European site network information, including site conservation objectives;
- National Parks and Wildlife Service – Information on the status of EU protected habitats and species in Ireland (including Article 17 and Article 12 Reports);
- National Biodiversity Data Centre records (viewed December 2025)

1.2.3 Process

The process of determining the likelihood of significant effects from a proposed project on European sites is an iterative process centred around a Source-Pathway-Receptor model as per OPR, 2021. In order for an effect to be established, all three elements of this mechanism must be in place. The absence of one of the elements of the mechanism is sufficient to conclude that a potential effect cannot occur.

- Source(s) – e.g. pollutant run-off, noise, removal of vegetation, etc.;
- Pathway(s) – functional link, or ecological pathway e.g. groundwater connecting to nearby qualifying wetland habitats; and
- Receptor(s) – the qualifying habitats and species of European sites and ecological resources supporting those habitats/species.

In the context of this report, a source is any identifiable element of the proposed project that is known to interact with the receiving environment. A receptor is the Qualifying Interests (QI)[8] for an SAC or Special Conservation Interests (SCI)[9] for an SPA or an ecological feature that is known to be utilised by the QI/SCI. In practice, the term Qualifying Interests also applies to SCIs (and is used in this document for simplicity). A pathway is any connection or link between the source and the receptor.

[8] SACs are areas designated under the Habitats Directive to conserve habitats listed in Annex I of the Directive and plant and animal species listed in Annex II. Collectively these are referred to as the 'Qualifying Interests' or 'QIs' of the SAC.
[9] SPAs are sites classified under the Birds Directive to protect rare or vulnerable bird species listed in Annex I to the Directive as well as regularly occurring migratory species and wetlands. Wetland habitats that support internationally important populations of migratory birds may be coastal or inland. Collectively, these species and habitats are referred to as the 'Special Conservation Interests' of the SPA.

The European Commission Notice (2021) on the 'Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC', states that in identifying European sites (Natural 2000 sites), which may be affected by the project, the following should be identified:

- Any European sites geographically overlapping with any of the actions or aspects of the plan or project in any of its phases, or adjacent to them;
- Any European sites within the likely Zone of Influence (ZoI) of the plan or project. European sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, including as regards the use of natural resources (e.g., water) and various types of waste, discharge or emissions of substances or energy;
- European sites whose connectivity or ecological continuity can be affected by the plan or project.

The ZoI of a project is therefore the geographical area over which it could affect the receiving environment in a way that could have potential effects on the Qualifying Interests of a European site.

1.3 Relevant Experience and Expertise of Assessor and Reviewer

Conor Murphy of FT prepared the report. Conor is a Project Ecologist working in the Circular Economy and Environment Team in FT. Conor has three years' postgraduate experience and holds a BSc. (Hons) in Zoology from University of Galway (formerly National University of Ireland, Galway) and a MSc. in Wildlife Conservation and Management (1st Class Hons) from University College Dublin. Conor has in-depth knowledge of environmental policy, legislation and assessment procedures. Conor has an in-depth knowledge of the AA process and understanding of the legislation governing AA practice in Ireland and the EU.

Donna O'Halloran of FT was responsible for reviewing, checking and finalising the report. Donna is a Senior Ecologist working as part of the Circular Economy and Environment Team at FT. Donna holds a MSc. First Class Honours in Ecological Assessment, a MSc. First Class Honours in Environmental Resource Management, a BSc (Hons) in Landscape Horticulture and a National Diploma in Horticulture. Donna has over 10 years' experience preparing Appropriate Assessment Screening Reports and Natura Impact Statements (NIS) for energy, circular economy and infrastructure projects. Donna has experience undertaking Appropriate Assessment (AA) of forestry related applications on behalf of the Minister of Department of Agriculture, Food and the Marine. Donna also has experience assisting County Councils and Government Departments in their delivery and implementation of planning services, reviewing the Ecological Impact Assessments (EcIAs), AA Screening Reports and NIS Reports of received planning applications. Donna has an in-depth knowledge of the AA process and has an in-depth understanding of the legislation and up-to-date case law governing AA practice in Ireland and the EU.

Richard Deeney of FT was responsible for reviewing the assessment and report. Richard is a Principal Environmental Scientist working as part of the Circular Economy and Environment Team at FT. Richard holds a B.Sc. First Class Honours degree in Environmental Management from Technological University Dublin (formerly Dublin Institute of Technology) and an Advanced Diploma in Planning and Environmental Law with the Honorable Society of King's Inns. Richard is a Chartered Environmentalist with the Society for the Environment and has 14 years' experience.

2. EXISTING SITE AND PROJECT DESCRIPTION

2.1 Site Description and Receiving Environment

The proposed development comprises two areas totalling approximately 2.37 hectares (ha). The south-western part of the proposed development 'Rock Road Mansions' (comprising 0.81 ha) is an existing halting site proposed for demolition. Rock Road Mansions is an existing residential site with an area of green space to the east of the dwellings.

The north-east part of the proposed development, Lock Road, comprises a 1.56 ha greenfield site, with an existing access path and hardstanding. According to the National Land Cover Map, the project comprises Cultivated Land (310) alone. The proposed Lock Road development will occupy land historically used for agriculture. The area surrounding the proposed development site is peri-urban in nature, with open agricultural fields to the west and south. Grange Castle Business Park is situated to the east and south-east of the development across the R120.

The proposed development can be accessed by the R120 to the east of the proposed development site. The wider road network includes the R134 to the south (c. 260 m). The M50 is located approximately 5.2 km to the east and can be accessed through the N4 to the north of the site. Existing transport services serving the area include Bus Stops 3413 on the 68 route on the R134.

The site is underlain by a Locally Important Aquifer (Bedrock which is Moderately Productive only in Local Zones). Groundwater vulnerability is classified as 'Extreme', indicating that groundwater at the site has natural characteristics that make it extremely vulnerable to contamination by human activities. Bedrock geology at the site comprises Visean limestone & calcareous shale.

The Project is located within the Liffey and Dublin Bay WFD Catchment (ID: 09), the Liffey WFD Sub-catchment (Liffey_SC_090), and LIFFEY_170 WFD Sub-basin (IE_EA_09L012100). Examination of EPA maps reveals that the Miltown Stream (EPA Code: 09M30, Order: 1st) is the nearest waterbody to the proposed development and is located ca. 329m to the south-east and flows east, discharging into the Irish Sea at Dublin Bay (IE_EA_090_0000) ca. 20 km (instream distance) to the north-east of the project. According to the Cycle 3 report (May 2024) for the Miltown Stream, the Stream is of poor water quality and at risk due to urban runoff and urban wastewater. The proposed development has an extremely low probability of coastal flooding due to its inland location. Examination of the Catchment Flood Risk Assessment Maps (CFRAM) flood maps are under review for this area, however National Indicative Flood Mapping indicate there are no areas of fluvial flooding at the site location.

No invasive species have been identified within the proposed development. Examination of the NBDC Maps indicates that there are no records of regulated invasive species within the proposed development.

2.2 Overview of the Project

The proposed development will comprise;

- Demolition and removal of the existing halting site known as Rock Road Mansions.
- Development of a new Traveller Accommodation Group Housing Scheme of 1 single storey detached home with 3 bedrooms, 3 halting bays with a day unit and adjacent mobile unit, homework club, play area and enterprise area.
- All associated roadways and paths, open spaces associated with the dwellings, provision of car parking spaces within the curtilage of the units, all hard and soft landscape works to include a berm to the west and South of the development, lighting, boundary fencing and walls and all associated infrastructure, site and development works necessary to facilitate the proposed development.

2.3 Detailed Description of the Project

2.3.1 Construction Phase

2.3.1.1 Sequence of Construction Works

The sequence of the construction works will be as follows:

- Stripping of topsoil and excavation of ground for construction of 1 no bungalow, and 3 no day units with adjacent hard standing, solid masonry construction.
- Trenching for and laying of foul water and water supply pipelines, Proposed connections for foul water and water supply will be to the east of the site, towards the R120.
- Fit out / ancillary works / mechanical and electrical works.
- Laying of road, footpaths and hard standing for grotto and enterprise area
- Levelling of soil and sowing grass seed to form grassed areas to the West and the East of the site.
- Formation of berm to the South and West of the site.
- Demolition of the existing halting site.

The exact sequencing of the works will be confirmed upon the appointment of a Contractor.

2.3.1.1.1 Proposed Demolition Works

The existing halting site to the south-west will be demolished to accommodate the development of a new road. The works will comprise:

- Demolition of 6 no halting bays, to include mobile unit, sanitation unit, hardstanding, and boundary walls.
- Demolition of an enterprise shed.
- Demolition of associated roadways, paths and boundary fencing.

Demolition waste will be removed to an appropriately authorised waste facility.

2.3.1.2 Construction Programme

The construction phase will last for approximately 9 to 12 months.

Hours of construction will be as follows:

- 07:00-19:00 on Monday to Friday
- 09:00-13:00 on Saturdays

No work will be undertaken on Sundays, bank holidays and public holidays.

Approximately 6 no. construction workers will be employed for the proposed development over varying stages of works.

2.3.1.3 Proposed Plant

A list of typical plant that will be utilised on site during works is provided below:

- Tractors
- Excavators
- Dumpers
- Rollers

2.3.2 Environmental Management during the Construction Phase of the Proposed Development

- All works will be carried out in accordance with a prospective Construction and Environmental Management Plan (CEMP).
- The proposed development is not foreseen to produce a significant quantity of waste. Any waste generated will be managed at an appropriately authorised off-site waste management facility.
- A prospective Surface Water Management Plan will also be adopted, with appropriate measures to prevent any polluting of surface water runoff from entering the receiving environment.

2.3.3 Operational Phase

- The proposed development will provide Traveller accommodation. Typical activity at the development will comprise home occupation and daily-life activities, and may extend to occasional home-based work and property maintenance.
- Water supply and foul water connections will be provided for sanitary facilities in the day units, the bungalow and the mobile units. A pre-connection application has been made to Uisce Éireann. The proposed development will connect into the existing foul water connection on the R120.
- Waste generated over the operational phase of the development will be collected and dispatched to an appropriately authorised waste facility.
- The proposed development will be designed to achieve an A2 Building Energy Rating. The specifics of how this will be achieved shall be determined by a Mechanical and Electrical (M&E) Engineer upon appointment.
- Stormwater generated over the operational phase will be managed by a number of soakaways on the site.

3. SCREENING FOR APPROPRIATE ASSESSMENT

3.1 Introduction

This section of the report examines whether the proposed works are likely to have a significant effect upon European Sites, either alone or in combination with other plans or projects.

It is of note that the SuDS features that are proposed to be constructed as part of the proposed development are not included within the design to avoid or reduce any potential harmful effects to any European sites, rather are included for alignment with the County Development Plan policies. This screening for AA does not take SuDS into consideration in determining whether the proposed development could result in likely significant effects on European sites.

It is also of note that the environmental management measures included in Section 2.3.2 are not considered when screening for AA i.e. these mitigation measures are not taken into consideration when determining whether the proposed development could result in likely significant effects on European sites.

3.1.1 Identification of European Sites within the Zone of Influence of the Proposed Project

As per CIEEM guidelines (2018), the ZoI for a proposed development is defined having regard to the spatial and temporal scale of potential biophysical changes in the environment which might occur as a result of the development and throughout its lifetime. In considering such potential biophysical changes, the following was considered:

- Impacts on habitats - the potential for biophysical change by disturbance/damage/ degradation is taken as the footprint of the works (including site clearance) plus 10m beyond (based on Ryan Hanley, 2014)[10]. There are no European sites located within 10m of the proposed development.
- For groundwater dependant terrestrial ecosystems (GWDTE), regard is had to SEPA guidelines[11] which prescribes a potential hydrogeological effect zone of 250m from ground works. There are no European Sites within 250 m of the proposed development.
- The potential disturbance zone for birds beyond the footprint of the proposed development was considered having regard to Cutts et al (2013) and was defined as 500m. There are no European sites within 500 m of the proposed development. Consideration of connectivity or ecological continuity for birds is set out in Section 3.1.2.

[10] Ryan Hanley (2014b) Stage 1: Appropriate Assessment Screening Methodology for the Maintenance of Arterial Drainage Schemes. Prepared by Ryan Hanley Consulting Engineers on behalf of the Office of Public Works

[11] Scottish Environment Protection Agency (2014) Land Use Planning System SEPA Guidance Note 31. Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and groundwater Dependent Terrestrial Ecosystems.

3.1.2 Connectivity or Ecological Continuity

Connectivity or ecological continuity refers to the degree to which different parts of a landscape, ecosystem, or habitat are physically or functionally linked, allowing the movement of organisms, nutrients, energy, or ecological processes across space. Consideration is therefore given to whether there could be landscape[12] or ecological connectivity[13] to any QI or SCI species. In considering connectivity or ecological continuity the following is noted:

- The habitats of the proposed development comprise a green field with areas of manmade track for access and built lands which are not integral to the maintenance of the structure or function of any other habitats within any European sites and do not form continuity with any such habitats.
- The Institute of Air Quality Management (Holman et al, 2024)[14] states that for sensitive ecological receptors, sensitivity to dust is 'High' up to 20m from the source and reduces to 'Medium' over 50m from the source. The guidelines also stipulate that dust deposition from construction typically occurs up to 500 m from large sites, 200 m from medium sites and 50 m from small sites. A 50m ZoI for dust is adopted given the small scale of the proposed project. There are no European Site within 50 m of the proposed development.
- For potential for impacts on surface waters, regard is had to IFI (2020) guidelines[15] which states that "The recommended [riparian] buffer zone width for larger river channels (>10m) is 35m to 60m and for smaller channels (<10m) is 20m or greater". The closest waterbody is the Miltown Stream, located 329 m from the proposed development. There is no connectivity between the proposed development and stream. There is no hydrological connectivity between the proposed development and any European Site
- The NRA (2008) Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes[16] notes a 150m potential disturbance zone for otter for breeding holts and 20m for non-breeding active holts. As such the study area included the proposed development site plus a 150m buffer to assess habitat suitability for otter and potential association with an SAC population. There is no European site designated for Otter within 150 m of the proposed development, and the proposed development is not hydrologically connected to any stream.
- Regard was had to SNH, 2016 'Guidance on Assessing Connectivity with Special Protection Areas (SPAs)', and an initial study area of 15km was adopted in order to determine whether there was connectivity between the proposed development and the avian SCIs of any SPA. Within this 15 km study area there is a single SPA: namely Wicklow Mountains SPA (IE0004040located 14.3 km away.
    - Wicklow Mountains SPA (IE0004040): The avian SCIs associated with this SPA are Merlin and Peregrine, which have relatively small core foraging ranges of 5 km and 2 km respectively (SNH, 2016[17]), as such, the project is located outside of the core foraging range of Peregrine and Merlin. Therefore, there is no S-P-R connectivity for significant effects on Wicklow Mountains SPA and listed SCIs.

[12] Landscape connectivity is a combined product of structural and functional connectivity, i.e. the effect of physical landscape structure and the actual species use of the landscape.
[13] Connectivity is defined as a measure of the functional availability of the habitats needed for a particular species to move through a given area. Examples include the flight lines used by bats to travel between roosts and foraging areas or the corridors of appropriate habitat needed by some slow colonising species if they are to spread.
[14] Holman et al (2024). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.
[15] Inland Fisheries Ireland (2020) A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning.
[16] National Roads Authority (2008). Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes.
[17] Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs).

Based on the above, landscape/ecological connectivity between the project and all Europeans sites is ruled out.

3.2 Summary of S-P-R Assessment

The following is concluded:

- There are no European sites geographically overlapping with any of the actions or aspects of the project in any of its phases, or adjacent to them.
- No European site is located with the ZoI of the project.
- There are no European sites whose connectivity or ecological continuity will be affected by the project.

3.3 Other plans and projects considered for potential in-combination effects

Article 6(3) of the Habitats Directive requires that:

> *"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives".*

It is therefore required that the likely significant effects of the proposed project are considered in-combination with any other plans or projects within the ZoI.

As there are no meaningful pathways for effects identified with respect to European sites - given the nature of the habitats that will be affected by the project and the distance from relevant SPA location for SCI species. There are no further considerations required as the S-P-R model has been completed with no potential effects that could arise from the proposed project.

3.4 Assessment of Likely Significant Effects

As per Section 3.2 there is no S-P-R connectivity between the project and any European Sites for likely significant effects.

3.5 AA Screening Conclusion

The Appropriate Assessment Screening Report concludes that, given the scale and nature of the potential sources, there are ***no likely significant effects*** identified to any European sites. This process has considered potential effects which may arise during all phases of the project. Through an assessment of the pathways for effects and an evaluation of the sources for impacts, taking account of the processes involved and the ZoIs, it has been evaluated that there are no likely significant effects on the QIs, SCIs or the conservation objectives of any designated European site as a result of the project on its own or in combination with other plans or projects.

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