

PROPOSED WHITECHURCH SPORTS FACILITY, DUBLIN 16

Report to Inform AA Screening

Prepared for:

South Dublin County Council



Comhairle Contae South Dublin
Átha Cliath Theas County Council

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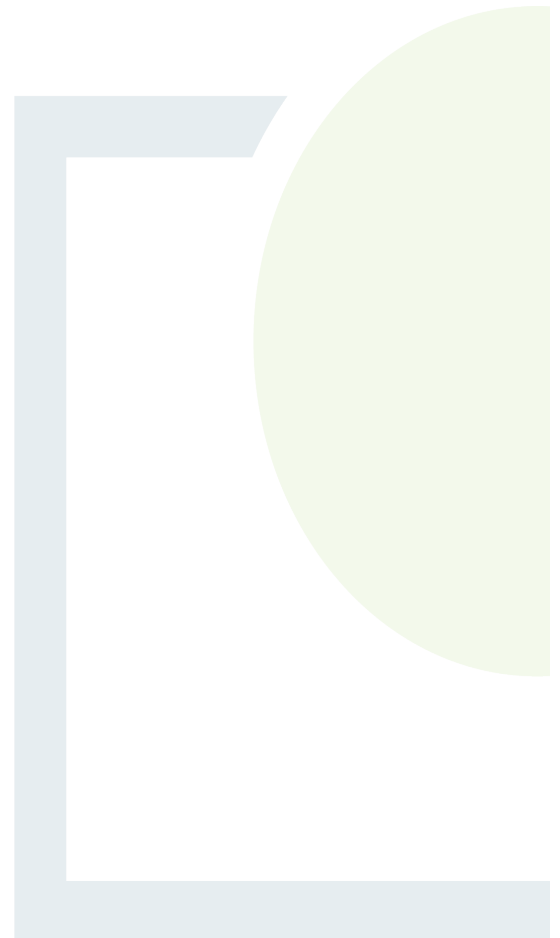
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Proposed Whitechurch Sports Facility, Dublin 16

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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 to prepare an Appropriate Assessment Screening Report for a proposed Sports Facility located at Glenmore Court, Rathfarnham, Dublin 16.

This report presents an examination of whether the proposed development 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."

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 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).



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, 25.1.2019⁵.
- 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.



1.3 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 four 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.

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.

Bernie Guinan was responsible for reviewing and approving the report. Bernie is Director with FT and is a Chartered Waste Manager. She has 25 years' experience in delivering and managing projects and infrastructure delivery for a wide variety of sectors. Bernie has extensive experience in all aspects of strategic management planning and infrastructure development in Ireland, the UK, KSA and UAE. She is an experienced planning policy analyst and strategic planner. She has in-depth knowledge of all environmental and planning policy, legislation and guidance. She has been providing environmental, planning and waste management consultancy services to public bodies for over 25 years. She has a vast amount of experience coordinating EIA, SEA and AA projects, including national, large-scale and complex projects.



1.3.1 Desktop Assessment

In June 2026, 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 June 2026)

1.3.2 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.



2. DESCRIPTION OF THE PROJECT

2.1 Overview of the Proposed Development

The proposed development will house the Whitechurch Boxing Club and Wanderers GAA Ballyboden, along with all associated works on undeveloped land north of the sports grounds connected with the school Scoil Mhuire, at Glenmore Court, Rathfarnham, Dublin 16.

The proposed development shall consist of:

- i. Construction of a new single-storey community sports facility building with a gross floor area (GFA) of c. 396 m², which is proposed to be accessed off the existing laneway to the west of the site. The structure will accommodate a boxing ring, training spaces, storage rooms, changing facilities, staff offices, and all of the required supporting spaces and services.
- ii. All associated site and infrastructural development works, including provision for hard and soft landscape works, paths, lighting and varied site boundary treatment comprising walls and fencing.

2.2 Construction Phase of the Proposed Development

2.2.1 Overview of the Proposed Construction Works

2.2.1.1 *Sequence of Construction Works*

The following construction sequence is expected to be carried out for the proposed development:

- Installation of temporary construction site area.
- Breaking of hard-standing areas, as required.
- Minor excavation to formation levels: A standard depth of 1.2 m (from the building foundation) is envisaged, with the exception for attenuation areas, which will be excavated at a maximum depth of 1.8 m. Excavated material will be re-used on site as feasible, with the excess material managed by the Contractor Proposal and a Construction Waste Management Plan.
- Laying of building foundations
- Backfilling of excavated material and any imported fill required will take place.
- Construction of the sports facility building, as per the development description.
- Installation/modification of site services, as set out below:
 - The construction of a wastewater connection to the existing wastewater sewer.
 - Connection of the facility to the existing ESB network.
 - Construction of new hardstand areas, as necessary.
- Building furnishings will be completed.
- Site clean-up and commissioning will be carried out.



2.2.2 Construction Programme

It is anticipated that construction undertaken over a 12- to 15-month period, with commencement at the subject site in Q2 of 2027. Construction works will occur between the following hours:

- 07.00 to 19.00 on Monday to Friday;
- 09.00 to 13.00 on Saturdays.

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

2.2.3 Environmental Management during Construction

The construction works will be undertaken in accordance with a Construction Environmental Management Plan (CEMP). This CEMP will cover the following aspects:

- Environmental Management System (EMS) requirements.
- Pollution Prevention
- Management of Noise, Vibration and Dust
- Surface Water Management
- Soil Management
- Emergency Response

Note: No environmental mitigation measures have been considered when examining whether the proposed development are likely to have a significant effect on a European site (either alone or in combination with other plans or projects)

The Contractor responsible for the construction works will be required to develop and implement a Construction Traffic Management Plan (CTMP) to manage safe access and egress of construction vehicles from the site and the movement of plant and vehicles around the site.

A Construction Stage Health and Safety Plan (CSHSP) will be adopted and adhered to by the Contractor to ensure minimal risk in terms of human health and the environment due to the construction works.

2.3 **Operational Phase of the Proposed Development**

The proposed development will form part of the community infrastructure within the area, with use by local sports clubs. The facility will require and use various utilities.

Wastewater generated from the proposed development will be discharged to the existing sewer network. Two options for connection points were identified for the proposed development:

- Existing mains to the west of the site
- Existing connection to the north-west of the site, shared with Scoil Mhuire.



Both identified options have been considered in this assessment. Water supply for the proposed development is proposed to be connected to the existing mains to the north of the proposed development.

Energy use at the facility will be sourced from the existing ESB network in the area.

The building will be designed to Nearly Zero Energy Building (NZEB) and Non-Domestic Energy Assessment Procedure (NEAP) requirements with a Building Energy Rating (BER) of A1.

The Sustainable Drainage Design Statement for the proposed development has been prepared by McCloy Consulting. The proposed SuDs approach for the proposed development will involve development runoff being collected and stored using an arrangement of vegetated rill (and associated voided storage) and a rain garden. Flow controls will be placed upon the rain garden located at the site access. Due to the relatively flat nature of the site, a single flow control will allow runoff to be attenuated in the SuDS features located at ground level.

Hydraulic analysis for the proposed development demonstrates that the use of a 22 mm orifice plate will limit flows from the 653 m² development to a maximum of 1 Lps for the 100 year +20% climate change rainfall event.

With regards to pollution control, the use of a swale will curb pollution hazards (identified to the be paved area for the proposed development). The developer will be responsible for ensuring the maintenance of the drainage system is provided as part of the overall management plan for the site.

Existing planting at the site is proposed to be retained wherever feasible. For new landscaped areas, native species of local provenance will be planted to support biodiversity. Since the proposed development site is primarily situated on asphalted sports courts, most of the landscaped area will remain as grass to serve the intended purposes of the space.

Traffic at the subject site is not expected to increase as the facility will primarily serve local residents and children. The new facility will consolidate the existing sports activities currently being done in the adjacent areas (e.g. GAA Club) without significantly increasing demand. No additional parking has therefore been proposed. Any occasional vehicular need will be met by parking at the school grounds as pedestrian and local access will be prioritised and encouraged over vehicular travel.

2.4 Existing Site

The overall development site comprises 0.17 hectare (ha) and is located in the townland of Edmonstown in South Dublin County. The site is zoned 'RES - To protect and/or improve residential amenity', under current SDCC Development Plan 2022-2028. The land use zoning for RES indicates that the proposed Sports Club/Facility land use is 'open for consideration' and therefore may be acceptable subject to detailed assessment.

The proposed development site is situated on the north side of existing pitches on disused sports courts (basketball court to the west and tennis court to the east). A primary school (Scoil Mhuire) is located to the west of the site. The site is bounded to the north by ESB grounds containing the Ballyboden 38 kV substation, and Glenmore Park housing estate to the east.

A habitat survey was conducted by an ecologist on 31/03/2025 of Glenmore Court. Habitats observed comprised BL3 - Buildings and artificial surfaces, GS2 - Dry meadows and grassy verges, WS1 - Scrub, WL1 - Hedgerow, WL2 - Treelines and GA2 - Amenity grassland (improved).

There were no records of Flora Protection Order (FPO) species recorded within the proposed development boundaries during the ecological walkover on 31/03/2025.



There were no records of regulated alien invasive species documented within the proposed development boundaries during the ecological walkover on 31/03/2025.

2.4.1 Description of Existing Ecological Baseline

2.4.1.1 *Desktop Assessment*

In June 2026, a desk study was carried out to collate available information on the existing natural environment at the location of the proposed development. This comprised a review of the following publications, data and datasets:

- Environmental Protection Agency (EPA) (on-line map-viewer including the Appropriate Assessment Tool);
- Aerial imagery of the proposed development and surrounding lands
- Tailte Éireann National Land Cover Map
- OSI Aerial photography and 1:50000 mapping
- Geological Survey Ireland (GSI) maps and data
- Department of Housing, Planning, and Local Government- EIA Portal;
- 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 (NBDC) Biodiversity Maps viewer (Accessed June 2026); and
- National Land Cover (2018) dataset (Accessed June 2026).

The area surrounding the site is urban/sub-urban in nature, consisting largely of housing estates, community infrastructure (Scoil Mhuire located c. 20 m to the east, Church of Our Lady of Good Counsel, located c. 172 m to the south-west, Whitechurch Community and Youth Centre, located c. 320 m to the south-east, Ballyboden Family Resource Centre, located c. 417 m to the south), various small businesses and retail offerings (Centra Whitechurch located c. 145 m to the south, Ballyboden Post Office located c. 125 m to the south).

The wider road network surrounding the proposed development site includes the R113 (c. 230 m to the north), and the R115 (c. 820 m to the west). The M50 motorway is approximately 1.3 km to the south-west. Public transport options available to the proposed development site includes Bus Stops 2983 and 2950 (Pearse Brothers Park) on the R113, which serve Dublin Bus routes 15D (Merrion Square - Whitechurch) and 74 (Dundrum Luas - Eden Quay), and private bus operator Go Ahead Ireland routes 161 (Rockbrook - Dundrum) and S8 (Kingswood Avenue - Dun Laoghaire Station).

The site boundaries do not overlap with any surface water bodies. The Proposed Development is located within the Liffey and Dublin Bay Water Framework Directive (WFD) Catchment (ID: 09), the Dodder WFD Sub-catchment (Dodder_SC_010), and the OWENADOHER_010 WFD Sub-basin (IE_EA_09O011700). Examination of EPA maps reveals that the nearest EPA watercourses to the Proposed Development site comprise the Kilmashogue (Whitechurch) Stream (EPA Code: 09K06, Order: 2nd), located c. 295 m to the east, and the Owenadoher River (EPA Code: 09O01, Order 4th), c. 570 m to the west. Both watercourses flow in a northerly direction, merging into the River Dodder (EPA Code: 09D01, Order: 5th) before feeding into the Liffey Estuary Lower (ID: IE_EA_09O_0300) c. 9.5 km (instream distance) to the north-east. The last known Q-values for these watercourses are 'Q3 - Poor' for the Kilmashogue (dated 1991) and 'Q4 - Good' for the Owenadoher (2010).



The site is classified as Discontinuous Urban Fabric under CORINE land cover (2018). Is located within the Soils and subsoils underlying the proposed development site are classified as 'Urban' and 'Made' respectively, indicating that the site has been impacted by human activity long-term.

According to the National Land Cover mapping, the surrounding environment comprises Other Artificial Surfaces, Hedgerows (460), Wet Grassland (540), Amenity Grassland, Buildings and Ways (120) and Broadleaved Forest and Woodland (440) with interspersed areas of Improved Grassland (510), Dry Grassland (530) and Mixed Forest (420).

The site is identified to be a Poor Aquifer by GSI, described as 'Bedrock which is Generally Unproductive except for Local Zones'. Groundwater vulnerability at the site is 'Moderate', defined as 'Groundwater here has natural characteristics that mean it has moderate vulnerability to contamination by human activities.

The proposed development site is not located within an area designated for fluvial flood risk. There is no pluvial flood risk available for the site.

There were no NBDC records of alien invasive species documented within the proposed development site.



3. SCREENING FOR APPROPRIATE ASSESSMENT

3.1 Introduction

This section of the report examines whether the proposed development 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.

3.2 Identification of European Sites within the Zone of Influence of the Proposed Development

The process of determining the likelihood of significant effects from a Proposed Development on European sites is an iterative process centred around a Source-Pathway-Receptor (S-P-R) model as per OPR, 2021¹⁰. 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. watercourse flowing into a downstream SAC; 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 Development that is known to interact with the receiving environment. A receptor is the Qualifying Interests (QI)¹¹ for an SAC/cSAC or Special Conservation Interests (SCI)¹² for an SPA/cSPA or an ecological feature that is known to be utilised by the QI/SCI. In practice, the term QI 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.

¹⁰ Office of the Planning Regulator. (2021). OPR Practice Note PN01 Appropriate Assessment Screening for Development Management

¹¹ 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 / cSAC.

¹² 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 / cSPA.



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 proposed development in any of its phases, or adjacent to them;
- Any European sites within the likely zone of influence (Zol) of the proposed development. European sites located in the surroundings of the proposed development (or at some distance) that could still be indirectly affected by aspects of the proposed development, 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 proposed development.

There are no European sites geographically overlapping with the proposed development. As such, further consideration is given to the 'likely zone of influence' and 'connectivity or ecological continuity'.

3.3 Zone of Influence

As per CIEEM guidelines (2018)¹³, the Zol for a proposed development is defined having regard to the spatial and temporal scale of potential biophysical changes in the environment which might occur because 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 10 m beyond (based on Ryan Hanley, 2014)¹⁴. There are no European sites located within 10 m of the Proposed Development.
- For groundwater dependant terrestrial ecosystems (GWDTE), regard is had to SEPA guidelines¹⁵ which prescribes a potential hydrogeological effect zone of 250 m from ground works. There are no European sites located 250 m of the Proposed Development.
- The NRA (2006) Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes¹⁶ notes a 150 m potential disturbance Zol for otter for breeding holts and 20 m for non-breeding active holts. As such the study area included the proposed development site plus a 150 m buffer to assess habitat suitability for otter and potential association with an SAC population. The proposed development is not located within 150 m from an SAC. Furthermore, there is no connections between the proposed development and any surface waterbody, therefore indirect connections can be ruled out.

¹³ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3. Chartered Institute of Ecology and Environmental Management, Winchester

¹⁴ 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

¹⁵ 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.

¹⁶ NRA, 2006. Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes. Dublin: National Roads Authority. Available at: <http://www.nra.ie/Environment/>



- The potential disturbance Zol for birds beyond the footprint of the proposed development was considered having regard to Cutts et al (2013)¹⁷ and was defined as 500 m. Consideration of connectivity or ecological continuity for birds is set out in 3.3.1.

3.3.1 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 landscape¹⁸ or ecological connectivity¹⁹ to any QI or SCI species. In considering connectivity or ecological continuity the following is noted:

- None of the terrestrial habitats that will be lost, damaged or degraded as a result of the proposed development are 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)²⁰ states that for sensitive ecological receptors, sensitivity to dust is 'High' up to 20 m from the source and reduces to 'Medium' over 50 m 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 50 m Zol for dust is adopted given the small scale of the proposed development. There are no European sites located within the Zol of dust deposition and there are no surface waterbodies located within the Zol for dust deposition. S-P-R connectivity is ruled out.
- For potential for impacts on surface waters, regard is had to IFI (2020) guidelines²¹ which states that "The recommended [riparian] buffer zone width for larger river channels (>10 m) is 35 m to 60 m and for smaller channels (<10 m) is 20 m or greater". There are no surface waters located within the Zol. There are also no indirect connections between the proposed development and any surface waterbody.
- For SPA birds, regard was had to the SNH guidelines²² for the core foraging ranges of SPA birds and a 15 km range was adopted for consideration. That is, an assessment was made as to whether the habitats within the Zol of the proposed development could act as foraging or roosting habitat for any birds of SPAs which are located within 15 km of the project, having regard to the conservation objective backing documents for each SPA. The SPAs within 15 km of the proposed development which are considered further in Table 3.1 for S-P-R connectivity are the Wicklow Mountains SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA and North Bull Island SPA.

¹⁷ Cutts N, Hemingway K and Spencer J (2013). The Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Projects. Produced by the Institute of Estuarine and Coastal Studies (IECS). Version 3.2.

¹⁸ 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.

¹⁹ 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.

²⁰ Holman et al (2024). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.

²¹ 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.

²² Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



- For SACs, consideration was given to existing records for Qualifying Interests in the locality of the proposed development and an assessment of the potential for mobile Qualifying Interests of European sites to use the lands within the disturbance and impact Zols, as based on the findings of desktop assessment and ecological field survey (carried out on 31st of March 2025 - see PEA Report²³) for further details on baseline environment). The habitats within the zone of impact of the proposed development include artificial surfaces, scrub, amenity grassland, grass verges, and a treeline of Alder (*Alnus* sp.), Willow (*Salix* sp.) and Hawthorn (*Crataegus monogyna*). These habitats and their urban context make them unsuitable to support any Qualifying Interests associated with any SAC.
- In terms of birds there are no SPAs within the 500 m potential disturbance Zol for birds. There is also no S-P-R connectivity for significant effects on the supporting/wetland habitat of SPAs. In order to assess potential connectivity between the proposed development and mobile SCIs, regard was had to the SNH guidelines for the core foraging ranges of SPA birds, and a 15 km range was adopted for consideration. That is, an assessment was made as to whether the habitats within the Zol of the proposed development could act as foraging or roosting habitat for any avian SCIs of SPAs which are located within 15 km of the proposed development, having regard to the conservation objective backing documents for each SPA. The following SPAs are located within 15 km of the proposed development: Wicklow Mountains SPA (IE0004040) (c. 4.7 km), South Dublin Bay and River Tolka Estuary SPA (IE0004024) (c. 6.8 km), North Bull Island SPA (IE0004006) (c. 11.5 km), North-west Irish Sea SPA (IE0004236) (c. 11.8 km) and Dalkey Islands SPA (IE0004172) (c. 12.9 km).
 - Wicklow Mountains SPA (IE0004040): This SPA is located c. 4.7 km from the proposed development. The proposed development lies within the core foraging range of Merlin, listed as 5 km (Nature Scot, 2016)²⁴. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.
 - South Dublin Bay and River Tolka Estuary SPA (IE0004024): This SPA is located c. 6.8 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exceptions of Tern species, Black-headed Gull and Light-bellied Brent Goose. Foraging ranges for Arctic tern, Common tern and Roseate tern lie between 23.2 km - 40.5 km (Nature Scot, 2023²⁵), approximately 18.5 km for Black-headed Gull (Nature Scot, 2023²⁵) and ca. 15 km is assumed based on the data provided in (SNH, 2016²⁶). The project and 500 m disturbance distance does not provide suitable habitat for Tern species and provides sub-optimal foraging habitat for these species. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.
 - North Bull Island SPA (IE0004006): This SPA is located c. 11.5 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exceptions of Black-headed Gull and Light-bellied Brent Goose. Foraging ranges for Black-headed Gull is approximately 18.5 km for Black-headed Gull (Nature Scot, 2023²⁵) and c. 15 km is assumed for Light-bellied Brent Goose based on the data provided in (SNH, 2016²⁷). The project and 500 m disturbance distance and provides sub-optimal foraging habitat for these species. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.

²³ Preliminary Ecological Appraisal Report prepared by Shane Somers, April 2025

²⁴ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)

²⁵ Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency

²⁶ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)

²⁷ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



- North-west Irish Sea SPA (IE0004236): This SPA is located c. 11.8 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exceptions of Tern and Gull species. Foraging ranges for Arctic tern, Common tern and Roseate tern lie between 23.2 km - 40.5 km (Nature Scot, 2023²⁸). Core foraging ranges for the six Gull species associated with the SPA lie between 18.5 km - 236 km (Nature Scot, 2023²⁵). This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.
- Dalkey Islands SPA (IE0004172): This SPA is located c. 12.9 km from the proposed development. The proposed development is located within the core foraging range for Arctic tern, Common tern and Roseate tern which lie between 23.2 km - 40.5 km (Nature Scot, 2023²⁵). This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.

²⁸ Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency



Table 3-1: Source-Pathway-Receptor Assessment

Site Code	Site Name	Distance (km)	Qualifying Feature	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
004040	Wicklow Mountains SPA	4.7	Peregrine falcon (<i>Falco peregrinus</i>) [A103] Merlin (<i>Falco columbarius</i>) [A098]	This SPA is located c. 4.7 km from the proposed development. Core foraging ranges for Peregrine and Merlin are 2 km and 5 km (SNH, 2016²⁹) respectively. In relation to Peregrine, the proposed development is located outside of the core foraging range for this species. Therefore, there is no S-P-R connectivity and no significant effects on SCI Peregrine. Theoretically, the proposed development and 500 m disturbance zone overlap with the core foraging ranges of Merlin associated with the SPA. The Conservation Objectives document indicates that this species predominantly nests in mature trees and forages in open semi-natural grassland. However, the project is located in an urban context, does not comprise suitable breeding habitat and the habitat within 500 m of the proposed development is disturbed, amenity grassland and sub-optimal. More valuable grassland habitat is present within the wider landscape. There will be no significant effects on SCI Merlin.	N

²⁹ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



Site Code	Site Name	Distance (km)	Qualifying Feature	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
004024	South Dublin Bay and River Tolka Estuary SPA	6.8	Sanderling (<i>Calidris alba</i>) [A144] Common tern (<i>Sterna hirundo</i>) [A193] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Arctic tern (<i>Sterna paradisaea</i>) [A194] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Roseate Tern (<i>Sterna dougallii</i>) [A192] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999] Knot (<i>Calidris canutus</i>) [A143] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141]	The SPA is located outside of the Zol of the proposed development and as such there is no potential for direct impacts on the SPA. However, consideration is given to potential for landscape/ecological connectivity. This SPA is located c. 6.8 km from the proposed development and is located outside of the core foraging range of all avian SCIs with the exception of Black-headed Gull, Tern species and Light-bellied Brent Goose. Foraging ranges for Arctic tern, Common tern and Roseate tern lie between 23.2-40.5 km (Nature Scot, 2023²²). The proposed development and 500 m disturbance distance do not provide suitable habitat for Tern species which are largely marine species. Core foraging range for Black-headed Gull is 18.5 km (Nature Scot, 2023³⁰). Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The habitat within 500 m of the proposed development project is disturbed, amenity grassland and built land and is sub-optimal. More valuable habitat is present within the wider landscape. There will be no significant effects on SCI Black-headed Gull.	N

³⁰ Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency



Site Code	Site Name	Distance (km)	Qualifying Feature	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
				The core foraging range of Light-bellied Brent Goose is assumed to be ca. 15 km based on the data provided in (SNH, 2016 ³¹). Theoretically, the proposed development and 500 m disturbance zone overlap with the core foraging ranges of this SCI associated with the SPA. According to the Conservation Objective supporting document, Light-bellied Brent Goose, have a preference for foraging in intertidal areas with the Eelgrass (<i>Zostera</i> sp) and will feed on improved grassland when their primary source of food becomes depleted. Disturbed, amenity grassland is located within the 500 m disturbance zone of the proposed development. Additionally, there are no NBDC records of Light-bellied Brent Goose within 500 m of the proposed development and improved grassland is common in the greater landscape. There will be no significant effects on SCI Light-bellied Brent Goose.	
004006	North Bull Island SPA	11.5	Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Dunlin (<i>Calidris alpina</i>) [A149] Knot (<i>Calidris canutus</i>) [A143] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wetland and Waterbirds [A999]	The SPA is located outside of the Zol of the proposed development and as such there is no potential for direct impacts on the SPA. However, consideration is given to potential for landscape/ecological connectivity. This SPA is located approximately 11.5 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exception of Light-bellied Brent Goose and Black-headed Gull.	N

³¹ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



Site Code	Site Name	Distance (km)	Qualifying Feature	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
			Black-tailed Godwit (<i>Limosa limosa</i>) [A156], Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Pintail (<i>Anas acuta</i>) [A054] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Redshank (<i>Tringa totanus</i>) [A162] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Curlew (<i>Numenius arquata</i>) [A160] Shoveler (<i>Anas clypeata</i>) [A056] Sanderling (<i>Calidris alba</i>) [A144] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Turnstone (<i>Arenaria interpres</i>) [A169]	The core foraging range of Light-bellied Brent Goose is assumed to be c. 15 km based on the data provided in (SNH, 2016²³). Theoretically, the proposed development and 500 m disturbance zone overlap with the core foraging ranges of these SCIs associated with the SPA. According to the Conservation Objective supporting document, Light-bellied Brent Goose, have a preference for foraging in intertidal areas with the Eelgrass (<i>Zostera</i> sp) and will feed on improved grassland when their primary source of food becomes depleted. Disturbed, amenity grassland is located within the 500 m disturbance zone of the proposed development. However, there are no NBDC records of Light-bellied Brent Goose within 500 m of the proposed development and improved grassland is common in the greater landscape. There will be no significant effects on SCI Light-bellied Brent Goose. In relation to Black-headed Gull, Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The habitat within 500 m of the proposed development is built land and disturbed, amenity grassland and is sub-optimal. More valuable habitat is present within the wider landscape. There will be no significant effects on SCI Black-headed Gull.	
004236	North-west Irish Sea SPA	11.8	Red-throated Diver (<i>Gavia stellata</i>) [A001] Great Northern Diver (<i>Gavia immer</i>) [A003] Fulmar (<i>Fulmarus glacialis</i>) [A009]	This SPA is located approximately 11.8 km from the proposed development. The proposed development is located within of the core foraging range of several predominantly marine avian SCIs, including Red-throated Diver, Tern and Gull species.	N



Site Code	Site Name	Distance (km)	Qualifying Feature	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
			Manx Shearwater (<i>Puffinus puffinus</i>) [A013] Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Common Scoter (<i>Melanitta nigra</i>) [A065] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Common Gull (<i>Larus canus</i>) [A182] Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] Herring Gull (<i>Larus argentatus</i>) [A184] Great Black-backed Gull (<i>Larus marinus</i>) [A187] Kittiwake (<i>Rissa tridactyla</i>) [A188] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Guillemot (<i>Uria aalge</i>) [A199]	Foraging ranges for Arctic tern, Common tern and Roseate tern lie between 23.2-40.5 km (Nature Scot, 2023³²). The proposed development and 500 m disturbance distance do not provide suitable habitat for Tern species which are largely marine species. Core foraging range for Red-throated Diver is 13.5 km (SNH, 2016³³). This species typically forages on sprats, sand eels and molluscs along shallow sandy bays. The proposed development and 500 m disturbance distance do not provide suitable habitat for Red-throated Diver which is a predominantly marine species. In relation to the Gull species associated with the SPA, core foraging ranges for these species lie between 18.5 km - 236 km (Nature Scot, 2023³⁴). Birdwatch Ireland indicates that Black-headed Gull, Common Gull and Lesser Black-backed Gull all forages on insects in coastal and inland habitats. However, the habitat within 500 m of the proposed development is built land and disturbed, amenity grassland and is sub-optimal for these species.	

³² Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency

³³ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)

³⁴ Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency



Site Code	Site Name	Distance (km)	Qualifying Feature	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
			Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204] Little Gull (<i>Hydrocoloeus minutus</i>) [A862] Little Tern (<i>Sternula albifrons</i>) [A885]	There will be no significant effects on Black-headed Gull, Common Gull and Lesser Black-backed Gull. Regarding Herring Gull, Great Black-backed Gull and Little Gull, the surrounding urban environment and disturbed, amenity grassland within 500m of the proposed development is sub-optimal for these species and more valuable habitat is present within the wider landscape. There will be no significant effects on SCIs Herring Gull, Great Black-backed Gull and Little Gull.	
004172	Dalkey Islands SPA	12.9	Common tern (<i>Sterna hirundo</i>) [A193] Roseate tern (<i>Sterna dougallii</i>) [A192] Arctic tern (<i>Sterna paradisaea</i>) [A194]	The SPA is located outside of the Zol of proposed development and as such there is no potential for direct impacts on the SPA. However, consideration is given to potential for landscape/ecological connectivity. This SPA is located c. 12.9 km from the proposed development. Theoretically, the proposed development and 500 m disturbance zone overlap with the core foraging ranges for Arctic Tern, Common Tern and Roseate Tern, which lie between 23.2-40.5 km (Nature Scot, 2023 ³⁵). However, the proposed development and 500 m disturbance distance do not provide suitable habitat for Tern species which are largely marine species. Therefore, there is no S-P-R connectivity for significant effects on Dalkey Island SPA and listed SCIs Arctic Tern, Common Tern and Roseate Tern.	N

³⁵ Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency



3.4 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 zone of influence.

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.

3.5 Screening Conclusion

The results of the S-P-R modelling process identified that - given the scale and nature of the potential sources identified in Section 3 - there are **no likely significant effects** identified to any European sites.

The AA screening process has considered potential effects which may arise during all phases of the proposed 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 distance of separation from European sites, it has been evaluated that there are no likely significant effects on the qualifying interests, special conservation interest or the conservation objectives of any designated European site.



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