

PROPOSED MIXED TENURE HOUSING DEVELOPMENT AT OLDCASTLE PARK, CLONDALKIN, DUBLIN 22

Report to Inform Appropriate Assessment (AA) Screening

Prepared for:

South Dublin County Council



Comhairle Contae South Dublin
Átha Cliath Theas County Council

Date: September 2026

Document No:

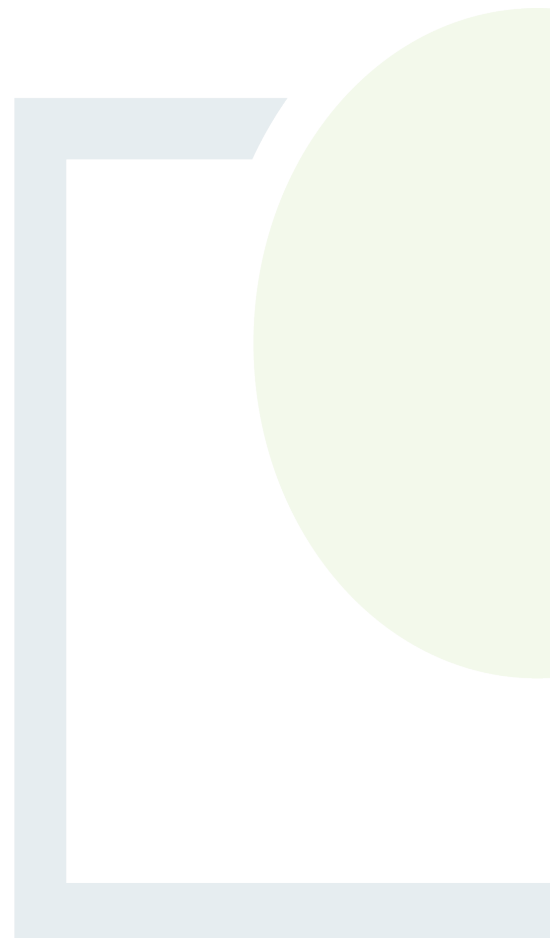
P24080-FT-EGN-XX-RP-EN-0010

Unit 3/4, Northwood House, Northwood Crescent,
Northwood, Dublin, D09 X899, Ireland

T: +353 21 496 4133 | E: info@ftco.ie

CORK | DUBLIN | CARLOW

www.fehilytimoney.ie



Report to Inform Appropriate Assessment (AA) Screening

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
0	Final	CW/CM/KB	RD	BG	21/09/2026

Client: South Dublin County Council

Keywords: Appropriate Assessment (AA), AA Screening, Article 6(3) of the Habitats Directive, European (Natura 2000) sites, Mixed Tenure Housing, Oldcastle Park.

Abstract: Fehily Timoney and Company is pleased to submit this Report to Inform AA Screening to South Dublin County Council for their Part 8 Planning Process for a Proposed Mixed Tenure Housing Development at Oldcastle Park, Clondalkin, Dublin 22.

TABLE OF CONTENTS

1.	INTRODUCTION	1
1.1	Legislative Context	1
1.2	Methodology	2
1.2.1	Guidance	2
1.3	Relevant Experience and Expertise of Assessor and Reviewer	3
2.	DESCRIPTION OF THE PROJECT.....	4
2.1	Overview of the Proposed Development.....	4
2.2	Construction Phase of the Proposed Development.....	4
2.2.1	Overview of the Proposed Construction Works	4
2.2.2	Construction Programme.....	5
2.2.3	Environmental Management during Construction	5
2.3	Operational Phase of the Proposed Development	6
2.4	Existing Site.....	7
2.4.1	Description of Existing Ecological Baseline	7
3.	SCREENING FOR APPROPRIATE ASSESSMENT	9
3.1	Introduction.....	9
3.2	Identification of European Sites within the Zone of Influence of the Proposed Development.....	9
3.3	Zone of Influence.....	10
3.3.1	Connectivity or Ecological Continuity	11
3.4	Other plans and projects considered for potential in-combination effects.....	16
3.5	Screening Conclusion	16

LIST OF TABLES

	<u>Page</u>
Table 3-1: Identification of European Sites within the Zone of Influence of the proposed project	13



1. INTRODUCTION

Fehily Timoney and Company (FT) was commissioned by South Dublin County Council to prepare an Appropriate Assessment Screening Report for a proposed mixed tenure housing development at Oldcastle Park, Clondalkin, Dublin 22.

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.'

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.

Clara Weldon is a Graduate Environmental Scientist working with the Circular Economy and Environment Team at FT, with one year of experience. She holds a BSc. in Sustainability with Social Science, Policy and Law from the University College Dublin. Clara has completed a number of baseline evaluations for EIA Screening reports over her time at FT.

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.



2. DESCRIPTION OF THE PROJECT

2.1 Overview of the Proposed Development

The proposed development will comprise:

- i. 140 social and affordable units (38 no. 1 bed apartments, 18 no. 2 bed apartments, 8 no. 3 bed apartments, 34 no. 2-bed houses, 36 no. 3-bed houses, 6 no. 4-bed houses)
- ii. 20 No. 3-bed single storey houses to accommodate existing traveller families living on the site.
- iii. New vehicular entrance to site off Grange Castle Road / R136.
- iv. All associated modifications and provision of boundary treatment to adjoining properties and roads. All associated upgrading of roadways, bike paths and paths, provision of all associated car and cycle parking spaces.
- v. All hard and soft landscape works, lighting, boundary structures and all associated ancillary buildings, infrastructure and all site and development works on and within the vicinity of the site necessary to facilitate the proposed development.

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 construction works will be split into two phases. The first phase will be carried out in the northern half of the site for approximately half of the proposed dwellings. The first phase will also include the construction of the new entrance off Grange Castle Road. The second phase will involve the construction of the southern half of the site.

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

- Site clearance works, including removal of any waste present on-site.
- Installation of temporary construction site area.
- Construction of temporary bays to accommodate existing families on site
- Breaking of hard-standing areas, as required.
- Minor excavation to formation levels.
- Laying of building foundations.
- Backfilling of excavated material and any imported fill required will take place.
- Construction of residential dwellings, as per the development description.
- Construction/installation of associated site infrastructure, including boundary treatments, roadways, paths, landscaping, surface water and wastewater drainage systems, lighting, boundary structures, and electrical connections.
- Fit out and furnishing of dwellings will be completed.
- Site clean-up and commissioning will be carried out.



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

- Tracked excavators
- Mobile crane
- Grader
- Front loader
- Dumper
- Ride-on roller
- Tipper lorry

The exact construction methods to be used will be determined by the appointed Contractor. It is anticipated that construction methods will be of a common system, commensurate of a project of similar scope, i.e., blockwork, light gauge steel or timber frame.

2.2.1.2 Relocation of Existing Residents

The proposed development will be constructed in phases to accommodate the relocation of existing residents. The TAU SDCC has consulted and engaged with the existing residents to minimise disruption to living arrangements. It is expected that some families may move off-site for the duration of the works, while other families may choose to temporarily re-locate within the site and move into the new residential units as they become available.

2.2.2 Construction Programme

It is anticipated that construction will be undertaken over 24 months, commencing in Q1 of 2027. The 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. Any noise-generating works outside of these hours will have to be agreed with SDCC.

Employee numbers and arrangements will be managed by the appointed Contractor. The expected employee numbers are anticipated to be commensurate with a project of similar scope.

2.2.3 Environmental Management during Construction

The construction works will be undertaken in accordance with a Construction Environmental Management Plan (CEMP), which will be prepared by the Contractor. 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
- Ecological Management
- Invasive Species Management
- Protection of Archaeology and Archaeological Monitoring, as necessary.

Note: No environmental mitigation measures have been considered when examining 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).

A Preliminary Health and Safety Plan is available for the proposed development, which was prepared in accordance with Article 12(1) (a) of S.I. No. 291 of 2013, the Safety Health and Welfare at Work (Construction) Regulations 2013. This will be updated and implemented by the appointed Contractor to ensure minimal risk in terms of human health and the environment due to the construction works.

An Outline Waste Management Plan (OWMP) has been developed for the proposed development. The OWMP will consider existing site conditions and construction activities and provide a framework for the appropriate management of waste arising from the site. The OWMP will also set objectives in accordance with the waste hierarchy and relevant legislation and guidance.

The OWMP will outline the principles for waste segregation, storage, handling, transport and management by appropriately authorised contractors/facilities. It will work towards waste prevention, minimisation, reuse, recycling, and appropriate disposal of generated waste.

2.3 Operational Phase of the Proposed Development

An overview of the key elements of the operational phase of the proposed development is provided below:

- **Activities:** The proposed development will provide housing to the local community. Typical activity at the proposed development will comprise home occupation and daily-life activities, and may extend to occasional home-based work and property maintenance.
- **Utilities:** Water supply and foul water connections will be provided for the units. The proposed development will connect into the existing foul water network in the area. The foul water connection will ultimately discharge to Ringsend Wastewater Treatment Plant.
- **Waste management:** Waste generated over the operational phase of the development will be collected and dispatched to an appropriately authorised waste facility.
- **Energy Use:** The proposed development will be designed to achieve an A1 Building Energy Rating. The specifics of how this will be achieved shall be determined by a Mechanical and Electrical (M&E) Engineer upon appointment. Air source heat pumps may be utilised for house units and exhaust air heat pump systems may be utilised for apartment units, along with the use of solar photovoltaic (PV) panels.
- **Stormwater Drainage:** Stormwater generated over the operational phase will be managed in accordance with a SuDS Strategy prepared for the proposed development. The SuDS strategy proposes a number of features for the site, including permeable paving, raingardens, swales and basins, mounds and contours and green roofs.
- **Access:** The proposed development, once operational, can be accessed through the west (off the R136) or the south (off the R134).



2.4 Existing Site

The overall development site comprises 5.8 ha of residentially zoned land. The site currently an existing halting site providing residential accommodation for the Traveller families permanently living on the site. It is located within the townlands of Deansrath and Nangor 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 development (residential development) is '*permitted in principle*'.

The proposed development site is bounded by the R134 New Nangor Road to the south and the R136 Grange Castle Road to the west and residential housing to the north and east. Saint Ronan's National Primary School and adjacent playing fields are to the north-east of the site.

2.4.1 Description of Existing Ecological Baseline

2.4.1.1 *Desktop Assessment*

In September 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 September 2026); and
- National Land Cover (2018) dataset (Accessed September 2026).

The area surrounding the proposed development is sub-urban/peri-urban in nature, consisting of housing estates, community infrastructure (St Ronan's National School and Deansrath Family Centre Pre-School on the north-east of the site boundary, Deansrath Health Centre, St. Ronan's Church and St Ronan's Community Centre, all which are approximately 190 m to the north-east), various small businesses and retail offerings (The Swallows Pub, Ladbrokes Bookies, Daybreak)

The wider road network surrounding the proposed development site includes the Nangor Road (R134) to the south, which also acts as the site access, and the Grange Castle Road (R136) to the west of the site. The M50 motorway is approximately 3.3 km to the east. Public transport options available to the proposed site includes Bus stops 3418 (Castlegrange Green) and 2166 (Castlegrange) on the R134, which serve Dublin Bus routes 13 (Mountjoy Sq- Grange Castle), 68 (Poolbeg Street- Citywest), and 151 (Docklands (East Rd.) - Foxborough (Balgaddy Rd.).



The proposed development is underlain by Dublin groundwater body (ID: IE_EA_G_008). The site is identified to be a Locally Important Aquifer GSI, described as '*Bedrock which is Moderately Productive only in Local Zones*'. Groundwater vulnerability at the site is '*High*', defined as '*Groundwater here has natural characteristics that make it highly vulnerable to contamination by human activities*'. Soils underlying the site are classified as Elton, described as '*Luvisol: Well drained mineral soils*', and Urban described as '*Urban - soil concreted cover*', and are underlain by Man made and Limestone till (Carboniferous) subsoils.

The proposed development is located within the Water Framework Directive (WFD) Catchment Liffey and Dublin Bay (Catchment ID: 09), the Liffey_SC_090 Sub-catchment (Sub-catchment ID: 09_15) and the LIFFEY_170 River Sub Basin (ID: IE_EA_09L012100). Examination of EPA maps reveals that the nearest EPA watercourses to the proposed development site comprise the Grand Canal Main Line (Liffey and Dublin Bay) (ID: IE_09_AWB_GCMLE) c. 747 m to the north. The receiving Grand Canal Main Line is of '*Good*' biological status (WFD Status 2019-2024) and is not at risk of failing to meet '*Good*' status.

As per CORINE land use (2024), the development site is classified as '*Discontinuous urban fabric*' (112).

According to the National Land Cover mapping, the proposed development comprises Buildings (110), Scrub (450), Other Artificial Surfaces (130), Hedgerows (460), Amenity Grassland (520), Wet Grassland (540), Improved Grassland (510) and Ways (120). Examination of the orthophotography also indicates the presence of Bare Soil and Disturbed Ground (240).

Examination of the Catchment Flood Risk Assessment (CFRAM) flood maps for the area indicate that the development site is not at high risk of fluvial flooding.

There were no 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 works are likely to have a significant effect upon European Sites, either alone or in combination with other plans or projects.

According to the ruling delivered in open court in Luxembourg on 15th June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

'In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site'.

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS) in large-scale residential developments), that are incorporated into the design of a proposal or project and which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is not to protect a European site, are permitted for consideration during the undertaking of AA Screening.

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, 2021⁸. 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.

⁸ Office of the Planning Regulator. (2021). OPR Practice Note PN01 Appropriate Assessment Screening for Development Management



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)⁹ for an SAC/cSAC or Special Conservation Interests (SCI)¹⁰ 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.

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 (Natura 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)¹¹, 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)¹². There are no European sites located within 10 m of the proposed development.

⁹ 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.

¹⁰ 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.

¹¹ 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

¹² 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



- For groundwater dependant terrestrial ecosystems (GWDTE), regard is had to SEPA guidelines¹³ 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 Schemes¹⁴ 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.
- The potential disturbance Zol for birds beyond the footprint of the proposed development was considered having regard to Cutts et al (2013)¹⁵ 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 landscape¹⁶ or ecological connectivity¹⁷ 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)¹⁸ 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.

¹³ 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.

¹⁴ 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/>

¹⁵ 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.

¹⁶ 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.

¹⁷ 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.

¹⁸ Holman et al (2024). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.



- For potential for impacts on surface waters, regard is had to IFI (2020) guidelines¹⁹ 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.
- 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. 12.6 km) and South Dublin Bay and River Tolka Estuary SPA (IE0004024) (c. 13.9 km).
 - Wicklow Mountains SPA (IE0004040): This SPA is located c. 12.45 km from the proposed development. The birds associated with this SPA, Peregrine and Merlin, have relatively small core foraging ranges of 2 km and 5 km respectively (SNH, 2016²⁰), 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.
 - South Dublin Bay and River Tolka Estuary SPA (IE0004024): This SPA is located c. 13.7 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, 2023²¹), approximately 18.5 km for Black-headed Gull (Nature Scot, 2023²¹) and ca. 15 km is assumed for Light-bellied Brent Goose based on the data provided in (SNH, 2016²⁰). This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.

Based on the above, the following European site is considered further in terms of potential S-P-R connectivity and potential for significant effects (see Table 3-1):

¹⁹ 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.

²⁰ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)

²¹ 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: Identification of European Sites within the Zone of Influence of the proposed project

Site Code	Site Name	Distance (km)	Qualifying Feature (qualifying interests & special conservation interests)	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
(004024)	South Dublin Bay and River Tolka Estuary SPA	13.7	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Wetland and Waterbirds [A999]	The SPA is located outside of the ZOI 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. 13.7 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exception 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 - 40.5 km (Nature Scot, 2023²²). The proposed development and areas within the 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, 2023²²). Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The habitats within 500 m of the proposed development are largely built environment and disturbed, amenity grassland and is sub-optimal. Additionally, there are no NBDC records of Black-headed Gull within 500 m of the proposed development.	N

²² 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 (qualifying interests & special conservation interests)	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
				More valuable habitat is present within the wider landscape. Additionally, the EPA's Round 4 Road Noise Agglomeration Maps for road traffic indicates Lden²³ values of 55 - 74 dB across the proposed development. These figures indicate noise levels typical of an urban environment dominated by road traffic, and which persist around the proposed development. There will be no significant effects on SCI Black-headed Gull. The core foraging range of Light-bellied Brent Goose is assumed to be ca. 15 km based on the data provided in (SNH, 2016²⁴). 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 Birdwatch Ireland, 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. However, disturbed amenity grassland and built land is located within the 500 m disturbance zone of the proposed development and there are no NBDC records of Light-bellied Brent Goose within 500 m of the proposed development.	

²³ Lden refers to the day-evening-night long-term average noise indicator. It is 'weighted' with a penalty for evening and night to account for extra annoyance in the evening and night-time periods.

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



Site Code	Site Name	Distance (km)	Qualifying Feature (qualifying interests & special conservation interests)	Source - Pathway - Receptor Assessment	Considered further in screening [Y/N]
				Furthermore, the EPA's Round 4 Road Noise Agglomeration Maps for road traffic indicates Lden ²⁵ values of 55 - 74 dB across the proposed development. These figures indicate noise levels typical of an urban environment dominated by road traffic, and which persist around the proposed development. There will be no significant effects on SCI Light-bellied Brent Goose.	

²⁵ Lden refers to the day-evening-night long-term average noise indicator. It is 'weighted' with a penalty for evening and night to account for extra annoyance in the evening and night-time periods.



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 development 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.



**DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE**

www.fehilytimoney.ie

 **Cork**

 **Dublin**

 **Carlow**

