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# APPROPRIATE ASSESSMENT SCREENING REPORT FOR PROVISION OF GLAMPING PODS AT CAMAC VALLEY CARAVAN & CAMPING PARK, CORKAGH, CO. DUBLIN

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# 1. Introduction

## 1.1 Background

Envirico Ltd was commissioned by South Dublin County Council to undertake an Appropriate Assessment Screening of a proposed application for the provision of glamping pods at Camac Valley Caravan & Camping Park, Corkagh, Dublin 12. A description of the proposed works is given in Section 4.2.

The purpose of this AA screening is to determine if the proposed works, alone or in combination with other plans or projects, is likely to have a significant effect (LSE) on a European site (Natura 2000 site); comprising of Special Area of Conservation (SACs) and Special Protection Areas (SPAs) in view of the site's conservation objectives.

## 1.2 Legislative Context for Appropriate Assessment

Regulation 42 of the European Communities (Birds and European Habitats) Regulations 2011 (S.I. 437 of 2011) (as amended) transposes Article 6 of the Habitats Directive (92/43/EEC) into Irish law. The regulations require that where a public authority wishes to progress a project (which is not directly connected with or necessary to the management of the site as a European Site), a screening for Appropriate Assessment (AA) of the project must be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that project, individually or in combination with other plans or projects is likely to have a significant effect on the European site. AA screening is required under Article 6(3) of European Union Council Directive 92/43/EEC (also known as the Habitats Directive), section 177U of the Planning and Development Act 2000 to 2018 and amendments (Amendment of Part XAB (appropriate assessment)).

In accordance with the requirements of the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC), Member States have identified a network of sites of conservation importance, hosting habitats and/or species identified in the Directives as needing to be either maintained at or returned to favourable conservation status. These sites are known as the European network and in Ireland, European sites comprise areas designated as Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSACs), Special Protection Areas (SPAs) and candidate Special Protection Areas (cSPAs).

These Directives require that where a 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 shall be subject to 'Appropriate Assessment' to identify any implications for the site in view of the site's conservation objectives. Specifically, Article 6(3) of the Habitats Directive states:

"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.

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".

Article 6(4) states:

"If, in spite of a negative assessment of the implications for the [European] site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of European is protected. It shall inform the Commission of the compensatory measures adopted."

This screening for Appropriate Assessment has been carried out in accordance with the following European Commission Guidance:

Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. DoEHLG (2010).

- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 and PSSP 2/10. National Parks and Wildlife Service (NPWS) (2010).
- Assessment of plans and projects significantly affecting European sites Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission (2001)

- Managing European sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Commission (2000)
- Communication from the Commission on the Precautionary Principle. European Commission, (2000).
- Assessment of plans and projects significantly affecting European sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Office for Official Publications of the European Communities, Luxembourg. European Commission (2002).

### **1.3 Statement of Authority**

#### **Maurice O Connor**

Maurice holds BSc (Hons) degree in Wildlife Biology from Munster Technological University (MTU), MSc in Ecological Assessment from National University of Ireland Cork (UCC) and he is a full member of the Chartered Institute of Ecology and Environmental Management, (MCIEEM). Maurice is an experienced ecological consultant with over 10 years' professional experience in Ireland, working independently and within consultancy. He has strong generalist ecological field skills in terrestrial and riparian environments and through his experience can demonstrate undertaking a range of ecological surveys including habitat, invasive and protected species survey, delivering initial site appraisals and identification of ecological constraints to inform environmental reports including EIAR, EclA, SEA and AA. Maurice has undertaken ecological assessments and surveys on a variety of project types (e.g. road schemes, waste, water, energy, and housing) involving survey, mitigation and enhancement. During his time as an environmental consultant, Maurice has completed numerous environmental assessments for both plans and projects.

#### **James Whelan**

James Whelan holds a BSc Hons from MTU Kerry in Wildlife Biology and he is currently working as an Project Ecologist with Oakwin. He is an experienced field ecologist and has conducted numerous surveys for a variety of projects. Experience includes designing a survey and control methodology for invasive species for rhododendron on a landscape level, involving detailed mapping and a review of approved control methods. He has carried out Phase 1 walkover surveys for Coillte afforestation projects as well as small to medium-sized housing developments and written subsequent AA, NIS, EclA and PEA reports for these and many other projects. He assisted

in breeding seabird surveys on the Blasket Islands via tape-playback methods and monitoring the biosecurity of the islands. Other work has included involvement in the production of farm plans for the conservation of Natterjack Toad and working with community groups to promote biodiversity in farmed landscapes. As an experienced drone pilot, he conducted drone surveys working with the NPWS in remote locations including the national parks in Killarney and Connemara and the Skellig Islands.

## 2. The Appropriate Assessment Process

### 2.1 Stages in Screening and Appropriate Assessment

Screening for Appropriate Assessment (AA) is broken into four distinct stages, as outlined in the European Commission Guidance document (2001). Within these stages, the potential of significant impacts/effects upon a European site will be assessed and detailed. The four stages of an AA are summarised below. Article 6(3) of the Habitats Directive, which details this assessment process, is implemented into law in Ireland through the provisions of Sections 177U and 177V of the ‘Planning and Development Act 2000 to 2018’.

All potential effects between activities associated with the proposed development and the ecological components of European sites must be considered. This includes potential effects on mobile species notably, birds, mammals, invertebrates, and migratory fish.

If the prospect of LSEs occurring cannot be excluded on the basis of objective information, the project is taken forward to the next stage of the process, Appropriate Assessment. At Screening, the burden of evidence is to show, on the basis of objective information, and beyond reasonable scientific doubt, that the project will have no LSEs on a European site. If the effect may be significant, or is not known, it would trigger the need for Appropriate Assessment. The entire process can be broken down into four stages (EC, 2001), as outlined below:

#### **Stage 1 - Screening**

Screening for an AA, in relation to the construction, management/operation and decommissioning of a specific proposed plan or project, shall be completed in order to assess whether said development, either individually or in combination with others, is likely to have a significant effect upon European sites locally, regionally or nationally, in view of these site’s conservation objectives.

#### **Stage 2 – Appropriate Assessment**

The competent authority detailing the AA shall, under Article 6(3) and Section 177V of the ‘Planning and Development Act 2000 to 2018’, make a decision as to whether or not the proposed development would affect or impact upon the integrity of a European site. Where there are adverse effects on site integrity identified, mitigation measures are proposed, as appropriate, to avoid adverse effects, and as such a European Impact Statement is then required. For projects,

the AA process is documented within a European Impact Statement (NIS). This is provided to the competent authority by the applicant, to facilitate an informed assessment of the project.

**Stage 3 – Assessment of Alternative Solutions**

If following AA, including proposal of mitigation, adverse effects on site integrity remain, or uncertainty remains, an Assessment of Alternatives is required. This process examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site.

**Stage 4 - Assessment where no alternative solutions exist**

Where alternative solutions, locations, etc. are absent, or if such solutions are likely to have increased levels of impact upon European sites, the competent authority must establish whether or not the plan or project can be considered as necessary for Imperative Reasons of overriding public interest (IROPI).

## 3. Screening Methodology

### 3.1 Desktop Review

An ecological desk review was undertaken in October 2024 in order to assess the potential impacts of the proposed project, as outlined in Section 4.2 of this document. The purpose of this review is to collate available data and information relating to the site and relevant European sites.

Within this review, sources, publications, and datasets that were consulted included:

- Details and qualifying interests of European sites
- Aerial photography and 1:50000 mapping
- National Parks and Wildlife Service (NPWS)
- Species and habitat records from the National Biodiversity Data Centre

#### 3.1.1 Websites and other Resources consulted.

- Environmental Protection Agency EPA Maps (<https://gis.epa.ie/EPAMaps/>)
- National Parks and Wildlife Service website (<https://www.npws.ie/>)
- National Biodiversity Data Centre website (<https://biodiversityireland.ie/>)
- Conservation Status Assessment Reports (CSARs), Backing Documents and Maps prepared in accordance with Article 17 of the Habitats Directive
- Published and unpublished NPWS reports on protected habitats and species including Irish Wildlife Manual reports, Species Action Plans and Conservation Management Plans and Conservation Objectives

### 3.2 Zone of Influence

The Zone of Influence (ZoI) for a project is the area over which significant effects could occur to ecological features from the proposed project and associated activities. The determination of a ZoI for a project should be identified on a case-by-case basis as there may be an effect on European sites that are at a distance from the development site itself. Considerations when determining the potential ZoI include:

- Ecological features within and in proximity to the proposed development
- Migratory/mobile species within the area
- Construction/operational activities that may cause a significant effect.
- Linkages to European sites or sensitive habitats connected to those sites.

Current Irish departmental guidance (DoEHLG, 2010) on the Zol to be considered during the AA process states the following:

*“A distance of 15km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et al., 2006). For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in-combination effects”.*

Given the relatively minor footprint of the proposed development and that the effects during operation of the proposed remediation works are likely to be slight to negligible, it is concluded that the Zol is likely to be significantly smaller than 15km.

### 3.3 European Sites and Identification

The identification of European sites, which have the potential to be impacted as a result of the proposed development (either individually and or in combination with other plans or projects, proposed or in development) is an important step in the assessment of such impacts whether they be indirect or direct. All European sites are different; hold differing ecological features, Qualifying Interests, conservation objectives, functions and general structure. Each relevant European site should be evaluated in order to determine if the proposed development is likely to have a significant effect on (EC, 2001).

The Qualifying Interests (QI) of each European site can be affected directly and indirectly. Direct effects include habitat loss and habitat fragmentation, which can occur as a result of development land-take, alteration of conditions within a protected site, etc. Indirect effects that have the potential to occur as a result of a project (either individually or in combination with others) can include the change of silt content of a system, alteration of groundwater flow, etc. These indirect effects have the potential to result in impact to Qualifying Interests which rely on optimum conditions within a specific area/catchment (EC, 2001).

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## 4. Screening

### 4.1 Introduction

The purpose of Screening is to determine whether AA is required. This is done by examining whether

- A plan or project which is directly connected with or necessary to the management of the site can be excluded from AA
- The potential effects of a plan or project, either alone or in-combination with other plans or projects, on a European site, in view of its conservation objectives and considering whether these effects will be significant.

#### 4.1.1 The Likely Significant Effect test

Screening is underpinned by an interpretation of LSE as this interpretation provides the benchmark for a finding of likely effects. Any assessment of significance must satisfy the principles that underpin a satisfactory determination for LSE with regard to the accumulation of impacts and an understanding of the nature, probability and severity of potential impacts. The terms ‘likely’ and ‘significance’ have been defined variously by governments and through the courts. The following sections seek to provide clarification on the current interpretation of these key terms as determined by recent guidance and case law.

#### 4.1.2 An interpretation of ‘likely’

European case law has established that the benchmark requirement of ‘likely’ should not be regarded as a measure of probability in the context of an AA. Rather, a LSE finding is an acknowledgment that the risk of a significant effect occurring exists. This approach is consistent with the findings in the Waddenzee judgement, which found that “*if it cannot be excluded, on the basis of objective information, that it will have a significant effect on that site*” then a LSE finding is appropriate.

More recently, this position was upheld in the European Court of Justice (ECJ) in Case C-258/11 (Sweetman v An Bord Pleanála (Ireland), where the judgment interprets “likely” to mean “may.” *The test is set at a lower level*” and “*there is no need to establish such an effect; it is merely necessary to determine that there may be such an effect*”. In cases where there is a determination

that there is no significant effect, the Waddenze judgment establishes that there must remain “no reasonable scientific doubt as to the absence of such effects.”

More recently the Kokott Judgement (Case C-721/21 Eco Advocacy CLG, (Request for a preliminary ruling from the High Court (Ireland)), delivered on 19<sup>th</sup> January 2023 states that;

*“At the stage of screening the need for an appropriate assessment under Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as amended by Council Directive 2013/17/EU of 13 May 2013, features of the plan or project involving the removal of contaminants that may have the effect of mitigating a harmful effect on the protected site may be taken into account, where it is clear, on the basis of objective considerations, that those features were incorporated into the design as standard features irrespective of any effect on the protected site concerned, and all reasonable scientific doubt concerning their effectiveness can be ruled out.”*

#### 4.1.3 An interpretation of ‘significant’

It was clarified in the ECJ Case C-127/02 (the Waddenze judgment) that the measure of significance should be made against the ecological objectives for which the site was designated: “where a plan or project is likely to undermine the site’s conservation objectives, it must be considered likely to have a significant effect on that site”.

The proposed project is not directly connected with, or necessary to the management of any European site therefore Screening for AA is required. This involves the following:

- Proposed development description.
- European site(s) identification, Qualifying Interests and conservation objectives
- Ecology baseline conditions within and in close proximity to proposed development.
- Assessment of likely effects
- Screening conclusion.
- CIEEM (2017). Guidelines for Preliminary Ecological Appraisal. (Chartered Institute of Ecology and Environmental Management) Second Edition
- Fossitt, J. (2000). Guide to Habitats in Ireland. The Heritage Council
- NRA (2010). Guidelines on the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads.

## 4.2 Description of the Proposed Development

The proposed development consists of the provision of 14 glamping pods in the Camac Valley Caravan and Camping Park located in West Dublin. The premises is owned by South Dublin County Council and operates through a Management Licence agreement with the current operator. The facility was constructed circa 1996. The internal layout of the park includes two principal roads and three minor roads separating the various divisions within the site. The park includes 113 serviced caravan sites, each site measuring 10m x 15m and having a hard stand area for a caravan and car.

The park also caters for approximately 50 tents and there is a special area to accommodate touring buses. The caravan sites are serviced with mains water, sewage and electricity, and there is also a chemical toilet disposal area. Fresh water points and electrical sockets are convenient for the tent locations. The site is served by a reception block, toilet and shower facilities, laundry room, camper's kitchen, first aid facility and coffee dock in the reception area. It also has a children's enclosed play park solely for the use of site guests. Free Wi-Fi is also provided. All public areas have ramped access and the complex includes seven accessible shower/toilet areas, an accessible camper's kitchen, and laundry room. Waste collections bins and recycling are also located on site. The subject site is outlined with a thick red line below and on the enclosed site location drawings.

The proposed development consists of the construction of 14 glamping pods at two locations, each measuring 6m x 3.1m with a separation distance of 6m between pods. Each pod will be constructed on a base, likely a concrete slab that will include an area for seating at the front of the pod. Each pod will be connected to the existing underground ESB supply within the site. As cooking, wash and waste facilities are already provided in the park, no connections will be made to the Bord Gáis network, the Uisce Eireann Foul Sewer or Water Supply network. At the time of writing this report, there are two potential locations the pods may be situated. It is the Park's intent to construct them at Location A in Figure 1, at the southwest of the site where there is grassland and three Leyland cypress trees, which would need to be removed. However, Location B at the north east corner is considered a secondary but alternative location. It consists of amenity grassland, a small hardstanding area in each existing bay and an ornamental hedge for separation. No tree or hedge removal is proposed for Location B. For the purposes of this screening, both Locations will be considered equally likely as the final location for the glamping pods. Project description is outlined below;

- General site set up

- Pre identified locations for storage of construction materials
- A clear zone above the Foul and Surface Water Sewers and the ESB underground network shall be kept free from any construction activity and a wayleave implemented (see Appendix 2) to facilitate all future operation and maintenance works requirements.
- Groundworks for the base for the glamping pods
- Construction of the glamping pods
- Landscaping of green areas within the site
- Restoration of site after works completed.



Figure 1. Location of the proposed location of the 14 glamping pods at Camac Valley Caravan and Camping Park

## 4.3 Baseline Characterisation

### 4.3.1 Overview of baseline data

A detailed site walkover was carried out on 16<sup>th</sup> October 2024 to inform the screening for Appropriate Assessment. This assessment included the identification of notable species, habitats, bat, bird and mammal evidence. Resulting from the survey findings, four habitat types were identified within the proposed development site: GA2 Amenity grassland, BL3 Buildings and artificial surfaces, WL2 Treelines and WS3 Ornamental/non-native shrubs.

The assessment of protected species and habitats and/or invasive species was undertaken in line with the following guidelines:

- CIEEM (2017). Guidelines for Preliminary Ecological Appraisal. (Chartered Institute of Ecology and Environmental Management) Second Edition
- Fossitt, J. (2000). Guide to Habitats in Ireland. The Heritage Council
- NRA (2010). Guidelines on the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads.

#### 4.3.2 Habitats



Figure 2. Habitat map of the proposed development site at Camac Valley Caravan and Camping Park

#### GA2 Amenity grassland

Amenity grassland was the predominant habitat found on-site. It was extremely species-poor, with only two regularly occurring species. Perennial ryegrass (*Lolium perenne*) was the dominant species with frequent White clover (*Trifolium repens*) found throughout. The habitat is used for camping, including tents, so the lawn is highly maintained, with a very short sward height of 5-10cm. In Location A, three Leyland cypress trees (*Cupressus x leylandii*) stood approximately 6-

9 metres tall, 5-6 metres wide at the base and 20 metres apart. No evidence of bat, bird or mammal use was observed of these trees. Across the rest of the park, mature Birch trees (*Betula sp.*) have been planted, especially along the roads and beside buildings. These trees ranged from 5 up to approximately 25 metres tall.

### **BL3 Buildings and artificial surfaces**

A number of buildings are located throughout the site. As described in Section 4.2, the layout includes two principal roads and three minor roads separating the various divisions within the site. All roads were paved with no species associated with them.

### **WL2 Treelines**

A treeline stretched along the length of the western boundary of the proposed development site, and to the rear of the proposed glamping pods at Location A. A number of tree species were present, including Elder (*Sambucus nigra*), Ash (*Fraxinus excelsior*), Birch (*Betula sp.*), Beech (*Fagus sylvatica*) and Elm (*Ulmus sp.*). These trees were of varying heights, growing 10-12m tall. The trees were planted outside the green fence boundary, but the fence also provided for some hedgerow species such as Ivy (*Hedera helix*), Bramble (*Rubus fruticosus agg.*) and Blackthorn (*Prunus spinosa*).

### **WS3 Ornamental/non-native shrub**

Hedges/ornamental shrubs were used to separate individual camping bays and ranged from 1-2 metres tall. Native species such as Hawthorn (*Crataegus monogyna*) comprised some of the hedges, but non-native species were the dominant components. Briançon apricot (*Prunus brigantina*) was used for the rest of the site perimeter, while New Zealand broadleaf (*Griselina littoralis*) was commonly used to separate camping bays.

### **4.3.3 Mammals and Aquatic Habitats**

The desk study search of NBDC, of the 1km square (O0529) encompassing the site, returned records for terrestrial mammals of; Eastern Grey Squirrel (*Sciurus carolinensis*), Greater White-toothed Shrew (*Crocidura russula*) and Red Fox (*Vulpes vulpes*). No records of aquatic species were retrieved from this search. No aquatic features were present on-site.

### **4.3.4 Avifauna**

The desk study of NBDC records lists 10 bird species for the 1km square (O0529) encompassing the site.

#### 4.3.5 Invertebrates

No investigation of invertebrates or micro-organisms was undertaken on the day of the site survey. The desk study search of NBDC records for the 1km square (O0529) encompassing the site yielded 15 species results, one of which is regarded as a Near Threatened Species, the Moss Carder-bee (*Bombus (Thoracombus) muscorum*).

#### 4.3.6 Invasive Species

A search for invasive species conducted during the site survey yielded no observations. The desk study search of NBDC, of the 1km square (O0529) encompassing the site, returned records for two invasive species. Greater White-toothed Shrew (*Crocidura russula*) is considered a Medium Impact invasive species, while Eurasian Grey Squirrel (*Sciurus carolinensis*) is considered a High Impact invasive, and is listed on the Third Schedule of the European Communities (Birds and Habitats) Regulations 2011 (S.I. 477/2011).

### 4.4 Identification of European Sites

There are eight European Sites within 15km of the proposed development site. Table 1 lists the European Sites within 15km and its distance in relation to the proposed development. Where potential pathways for significant effects are identified, the site is included within the ZOI of the proposed works and additional assessment is required. Table 2 details the potential receptor links between the proposed project (works) and the relevant European site.

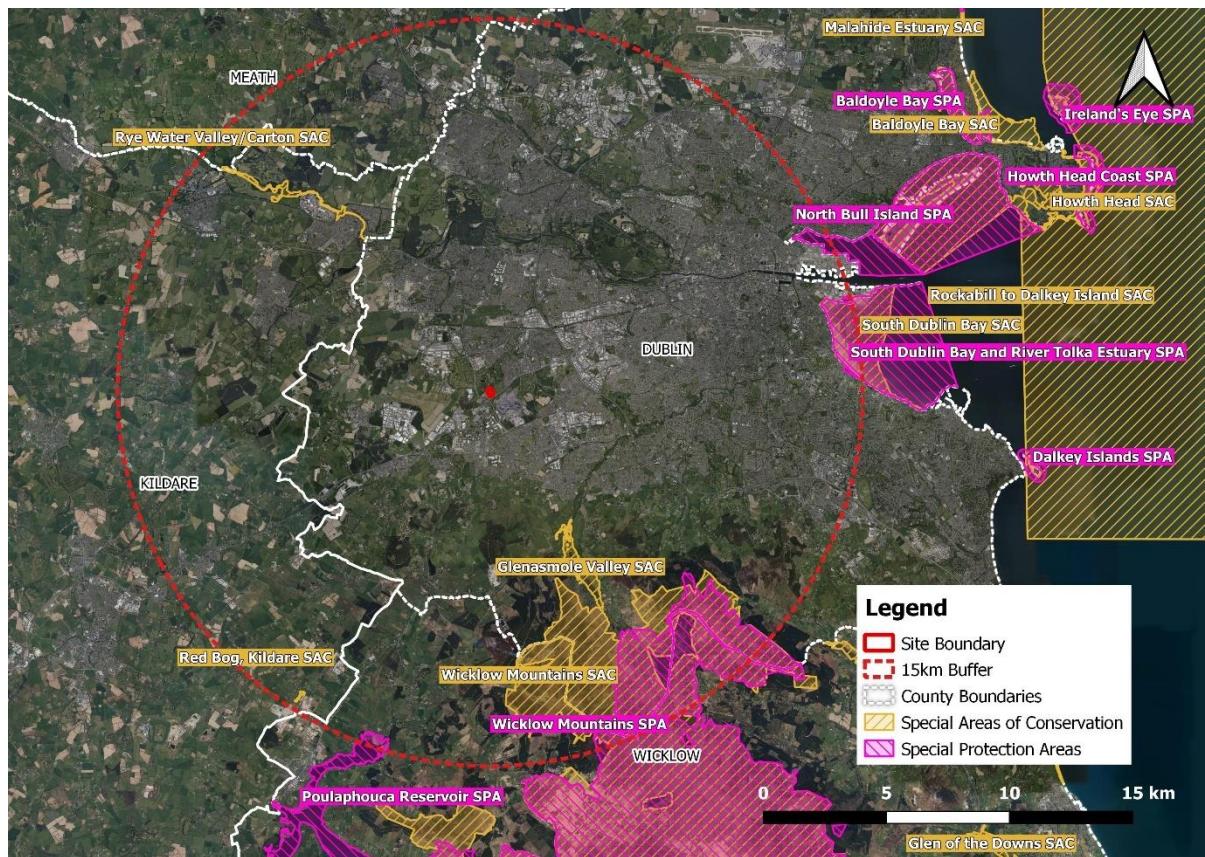


Figure 3. European/Natura 2000 sites within 15km of the proposed development

Table 1. European sites within 15km of the proposed development

European Site	Site Code	Qualifying Interests and Special Conservation Interests (QIs and SCIs)	Approximate Distance from Proposed Area	Potential receptor links between proposed development & the European site	Likely to Occur on site, in area or adjacent to European sites
Glenasmole Valley SAC	001209	<b>Habitats</b> 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)  6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion)	6.11km	No potential direct, indirect or cumulative threats to qualifying interests of the site.  No loss of habitat or disturbance.	No hydrological connection.

		caeruleae)  7220 Petrifying springs with tufa formation (Cratoneurion)*			
<b>Wicklow Mountains SAC</b>	002122	<p><b>Habitats</b></p> <p>3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)</p> <p>3160 Natural dystrophic lakes and ponds</p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>4030 European dry heaths</p> <p>4060 Alpine and Boreal heaths</p> <p>6130 Calaminarian grasslands of the <i>Violetalia calaminariae</i></p> <p>6230 Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)*</p> <p>7130 Blanket bogs (* if active bog)</p> <p>8110 Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)</p> <p>8210 Calcareous rocky slopes with chasmophytic vegetation</p> <p>8220 Siliceous rocky slopes with chasmophytic vegetation</p> <p>91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p><b>Species</b></p> <p>1355 Otter (<i>Lutra lutra</i>)</p>	8.01km	<p>No potential direct, indirect or cumulative threats to qualifying interests of the site.</p> <p>No loss of habitat or disturbance.</p>	No hydrological connection.
<b>Rye Water Valley/Carton SAC</b>	001398	<p><b>Habitats</b></p> <p>7220 Petrifying springs with tufa formation (Cratoneurion)*</p> <p><b>Species</b></p> <p>1014 Narrow-mouthed Whorl Snail (<i>Vertigo</i></p>	8.04km	<p>No potential direct, indirect or cumulative threats to qualifying interests of the site.</p> <p>No loss of habitat or disturbance.</p>	No hydrological connection.

		<i>angustior)</i> 1016 Desmoulin's Whorl Snail ( <i>Vertigo mouliniana</i> )			
<b>South Dublin Bay SAC</b>	000210	<b>Habitats</b> 1140 Mudflats and sandflats not covered by seawater at low tide  1210 Annual vegetation of drift lines  1310 Salicornia and other annuals colonising mud and sand  2110 Embryonic shifting dunes	13.84km	No potential direct, indirect or cumulative threats to qualifying interests of the site.  No loss of habitat or disturbance.	No hydrological connection.
<b>Red Bog, Kildare SAC</b>	000397	<b>Habitats</b> 7140 Transition mires and quaking bogs	14.15km	No potential direct, indirect or cumulative threats to qualifying interests of the site.  No loss of habitat or disturbance.	No hydrological connection.
<b>Wicklow Mountains SPA</b>	004040	<b>Birds</b> A098 Merlin ( <i>Falco columbarius</i> )  A103 Peregrine ( <i>Falco peregrinus</i> )	10.75km	No potential direct, indirect or cumulative threats to qualifying interests of site.  Amenity Grassland Habitat not utilised as a feeding site for Annexed Bird Species.	No hydrological connection.
<b>South Dublin Bay and River Tolka Estuary SPA</b>	004024	<b>Birds</b> A046 Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> )  A130 Oystercatcher ( <i>Haematopus ostralegus</i> )  A137 Ringed Plover ( <i>Charadrius hiaticula</i> )  A141 Grey Plover ( <i>Pluvialis squatarola</i> )  A143 Knot ( <i>Calidris canutus</i> )  A144 Sanderling ( <i>Calidris alba</i> )  A149 Dunlin ( <i>Calidris alpina</i> )  A157 Bar-tailed Godwit ( <i>Limosa lapponica</i> )	13.75km	No potential direct, indirect or cumulative threats to qualifying interests of site.  Amenity Grassland Habitat not utilised as a feeding site for Annexed Bird Species.	No hydrological connection.

		<p>A162 Redshank (<i>Tringa totanus</i>)</p> <p>A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>)</p> <p>A192 Roseate Tern (<i>Sterna dougallii</i>)</p> <p>A193 Common Tern (<i>Sterna hirundo</i>)</p> <p>A194 Arctic Tern (<i>Sterna paradisaea</i>)</p> <p><b>Habitats</b> Wetlands</p>			
<b>Poulaphouca Reservoir SPA</b>	004063	<p><b>Birds</b></p> <p>A043 Greylag Goose (<i>Anser anser</i>)</p> <p>A183 Lesser Black-backed Gull (<i>Larus fuscus</i>)</p>	14.64km	<p>No potential direct, indirect or cumulative threats to qualifying interests of site.</p> <p>Amenity Grassland Habitat not utilised as a feeding site for Annexed Bird Species.</p>	<p>No hydrological connection.</p>

Based on the project description as set out in Section 4.2 and the Zol over which the effect could occur, i.e. the distance at which the proposed development could have potential effects, using professional judgement and published guidance, potential effects can be identified. Table.2 focuses on the potential effects that could occur during the construction and operational phase of the proposed project.

Table 2. Potential effects

Potential Effect	Description of Effect	Zol- likely area over which effect could occur
<b>Construction</b>		
<b>Construction outside the Zol</b>	Direct disturbance (i.e. habitat removal, reduction, fragmentation/recreation disturbance)	<p>The construction of 14 glamping pods are confined to the project site, so therefore, there is no potential for this impact to occur to any of the European/European sites either within or outside the Zol.</p> <p>The proposed development will be fully regulated to manage all on site activities. Therefore, there is no potential for this impact to occur.</p>
<b>Sediment and pollution events</b>	Indirect impacts on habitat (e.g. reduction in surface water	No hydrological or any other connection was found between

	quality/ introduction of invasive spp.)	the proposed development site and any European site.  The proposed development will be fully regulated to manage all onsite activities. There is no potential for this impact to occur owing to the distance from a European site.
<b>Noise and vibration/unfamiliar visual stimuli (e.g. machinery/people)</b>	Disturbance (e.g. noise/recreational etc.)	The nearest European site is approximately 6km from the proposed development, therefore, there is the potential for this impact to occur.
<b>Operational</b>  <b>The operational phase of this project will be the management of the glamping pods in the Park (maintenance and services). There are no operational impacts predicted to occur.</b>		

## 4.5 Sites within the ZOI

The European Sites within proximity to the proposed development have been identified and examined, and the potential impacts from the project have been listed, in Tables 1 & 2 respectively. The proposed development involves minimal digging, with each glamping pod connected to the ESB supply, but to no other services, meaning no water connections will be made. The proposed development is located entirely within the camping and caravan park which is a highly modified environment, where all runoff diverts to the main Uisce Eireann foul sewer system. There are no aquatic features within the park, and no hydrological connections to any European site.

Given the size, scale and nature of the proposed development, and the lack of potential pathways to European sites, it is concluded that none of the eight sites fall within the Zone of Influence.

## 5. Assessment of Likely Significant Effects

The determination of Likely Significant Effects (LSEs) is considered to be any effect that may possibly occur as a consequence of the project that would undermine the conservation objectives for the site's Annex I habitats or Annex II species. As explained in Section 4.5, the potential effects from the proposed development on surrounding European sites have been shown to be negligible and not likely to occur.

It has been determined that there is no hydrological, physical or ecological links between the proposed development and any Natura 2000/European sites, therefore there is no possibility of LSE occurring on any European site.

### 5.1 In Combination Effects

The proposed development was assessed in combination with other plans or projects in the area. The combined effects of this project and other developments, being carried out at the same or similar time as the proposed development, have the potential to result in cumulative impacts on the environment.

An online planning search for relevant plans, projects and developments within the immediate surroundings of the site was undertaken for assessment of cumulative impacts. The sources listed below were searched:

South Dublin County Council

An Bord Pleanala

EIA Portal

National Road Authority

The majority of proposed and permitted developments within the area surrounding the proposed development site over the previous five years are largely composed of private extensions, demolitions and smaller residential developments. Three larger scale developments were also identified:

Planning was granted by An Bord Pleanala for a new quarry at Bedlesshill, Belgard, Brownsbarn, Cheeverstown, Buckandhounds, Kingswood and Whitehall Townlands, Fortunestown, Tallaght,

Dublin 24. The applicant was Roadstone Wood Ltd.. The development involved the installation of a quarry for extracting limestone using blasting techniques over an 18.2ha and would be an extension of an existing quarry. All associated facilities and machinery would be stored on-site. The application was granted in May 2019 (SU06S.SU0061).

South Dublin County Council granted permission under Part 8 for enhancements and upgrades of Corkagh Park, Clondalkin, Dublin 22. The development consisted among other things of: Provision of wayfinding and signage installations; Enhancement of the primary and secondary routes; Construction of a new 'hub zone' to include a Café building with 10 no. public toilets, kitchen, storage, serving area and internal seating; multi-use events space with a stage and hard-standing area; soft-landscaping with formal seating areas; picnic areas; amenity lawn; mounds; incidental play area; and planting; Removal and replacement of trees that are in poor health or pose a risk to safety; Upgrading of St. John's Wood Car Park to include resurfacing; improved pedestrian links and footpaths, dropped kerbs and crossings; replacement of existing gates; reorganisation of internal vehicular routes. Permission was granted in February 2022 (SD218/0011).

South Dublin County Council granted permission for the relocation of Clondalkin RFC grounds at Gordan Park to new lands at Kingswood Farm. The development consisted of 4 new rugby playing pitches, including a high quality main competition pitch (with modern directional floodlighting comprising 18m high floodlighting columns either side) and a high quality Junior pitch both laid approximately level, and two back pitches as well as various grassed rugby training areas all laid on existing land cross fall levels; change of use of existing agricultural shed to accommodate new two storey changing facility and storage areas; a new two storey Clubhouse Pavilion with supporting facilities including dressing rooms, physio rooms, coffee dock, committee rooms, members bar and lounge, plantroom and toilets; all associated site development sustainability and infrastructure work including connection to existing public foul sewer, SUDs, sedum roof and PV roof panels; new landscaping throughout the site comprising trees, hedges and wild flower areas; new cycle track and pedestrian access and stairs off the R136, bicycle shelter, children's playground area, electrical car charging stations, vehicle parking and new vehicle entrance off the Old Country Roadway. The application was granted in March 2023 (SD22A/0081).

The developments outlined above were identified from the above sources within close proximity of the proposed development. A number of smaller planning applications predominantly for extensions or alterations to existing residential dwellings were also identified. Given the nature and design of these developments which incorporate best design practice for wastewater and

surface water management, and the scale and nature of the works at Camac Valley Caravan and Camping Park, there is unlikely to be any in combination effects from the proposed development.

## 6. Screening Statement and Conclusion

This assessment considers whether the proposed construction of 14 glamping pods at Camac Valley Caravan and Camping Park, Corkagh, Dublin 22, alone or in combination with other projects or plans, will have adverse effects on the integrity of nearby European sites. Following examination of the proposed development, including the nature and location of works, it is concluded that there is no potential to impact on Annex I habitats or Annex II species associated with European Sites, namely Glenasmole Valley SAC, Wicklow Mountains SAC, Rye Water Valley/Carton SAC, South Dublin Bay SAC, Red Bog, Kildare SAC, Wicklow Mountains SPA, South Dublin Bay and River Tolka Estuary SPA, and Poulaphouca Reservoir SPA. As this assessment has not identified any potential significant impacts to nearby European sites, a Stage 2 Appropriate Assessment and subsequent Natura Impact Statement are not deemed necessary.

The findings of this screening for Appropriate Assessment are summarised in the Findings of no Significant Effects Matrix hereunder:

Findings of No Significant Effects Screening Matrix	
<b>Name of project or plan</b>	South Dublin County Council, provision of Glamping Pods at Camac Valley Caravan & Camping Park, Corkagh, Dublin 22, D22DR60
<b>Name and location of European site</b>	<b>Glenasmole Valley SAC 6.11km away</b> <b>Wicklow Mountains SAC 8.01km away</b> <b>Rye Water Valley/Carton SAC 8.04km away</b> <b>South Dublin Bay SAC 13.84km away</b> <b>Red Bog, Kildare SAC 14.15km away</b> <b>Wicklow Mountains SPA 10.75km away</b> <b>South Dublin Bay and River Tolka Estuary SPA 13.75km away</b> <b>Poulaphouca Reservoir SPA 14.64km away</b>
<b>Description of the project or plan</b>	The construction of 14 glamping pods at Camac Valley Caravan and Camping Park, Corkagh, Dublin 22.
<b>Land take</b>	None from European sites and no further land take is required from the Site as the boundaries are already in place.
<b>Resource requirements (Water abstraction etc.)</b>	No resources from a Natura site are required or have been required.
<b>Sediment and Pollution (disposal to land, water or air)</b>	There are no sediment or pollution pathways to water that could have affected European sites. No surface water hydrological pathways have been identified between the Site and European sites

<b>Excavation requirements</b>	There are and have been no excavation requirements within the European sites or those that could affect European sites through source pathway modelling.	
<b>Transportation requirements</b>	Transportation of materials to and from Site will not affect / would not have affected European sites in a way that would be measurable.	
<b>Is the project or plan directly connected with or necessary to the management of the site?</b>	No.	
<b>Are there other projects or plans that together with the project or plan being assessed could affect the site?</b>	No. Plans and projects within the local area are predominantly small scale residential and commercial developments.	
<b>The Assessment of Significance of Effects</b>		
<b>Describe how the project or plan (alone or in combination) is likely to affect the European site.</b>	No likely effects determined. All potential impacts are determined as extremely unlikely.	
<b>Explain why these effects are not considered significant</b>	No impacts have been determined therefore there can be no alteration of the conservation condition or objectives of the European sites due to the proposed works.	
<b>Data collected to carry out the assessment</b>		
<b>Who carried out the assessment?</b>	<b>Sources of Data</b>	<b>Level of Assessment</b>
Maurice O'Connor Senior Ecologist Envirico Ltd.	Refer to Section 7. References	Desk study plus field assessment

## 7. References

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Fossitt J.A. 2000. A Guide to Habitats in Ireland. Heritage Council, Kilkenny.

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<https://housinggov.ie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>

## Appendix 1 – Types of Glamping Pods and Suppliers Proposed

<b>1-11 are glamping facilities</b>	
<b>1.Gateway Glamping, Farranfore, Co Kerry</b>	
<b>2.Westport Glamping at Doon Angus Farm, Mayo.</b>	

**3.Ceide Glamping, Ballycastle, Co Mayo**



**4.Podumna Glamping Village, Portumna, Galway**



**5.Aran Islands Camping & Glamping – Co Galway**



**6.Easkey Glamping Village, Co Sligo**



**7.Dingle Way Glamping, Kerry**



**8.Nádúr Pods, Killarney**



**9. Mac Nean Glamping, Cavan**



**10. Giltraps Townhouse & Glamping, Kinnity, Co Offaly.**



**11.The Buzzard, Dungarvan, Co Waterford**

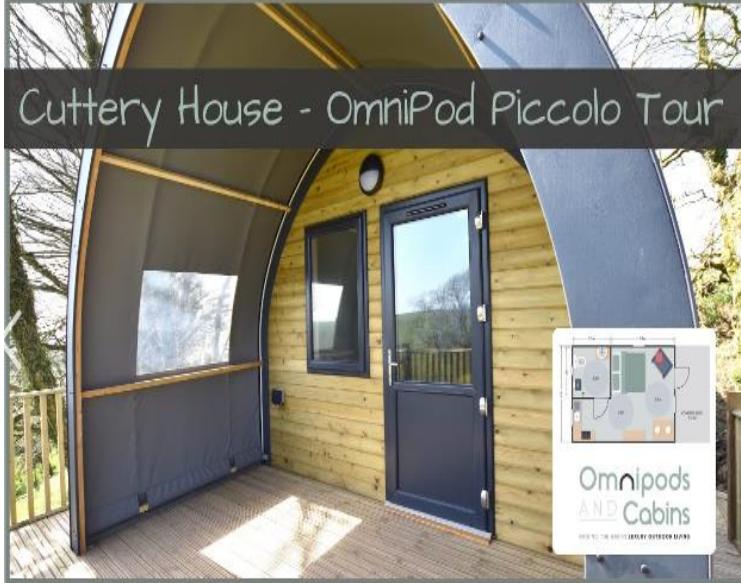


**Suppliers:**

<b>Name</b>	<b>Contact No</b>	<b>Website/ Link</b>	<b>Type provided</b>	<b>Cost</b>

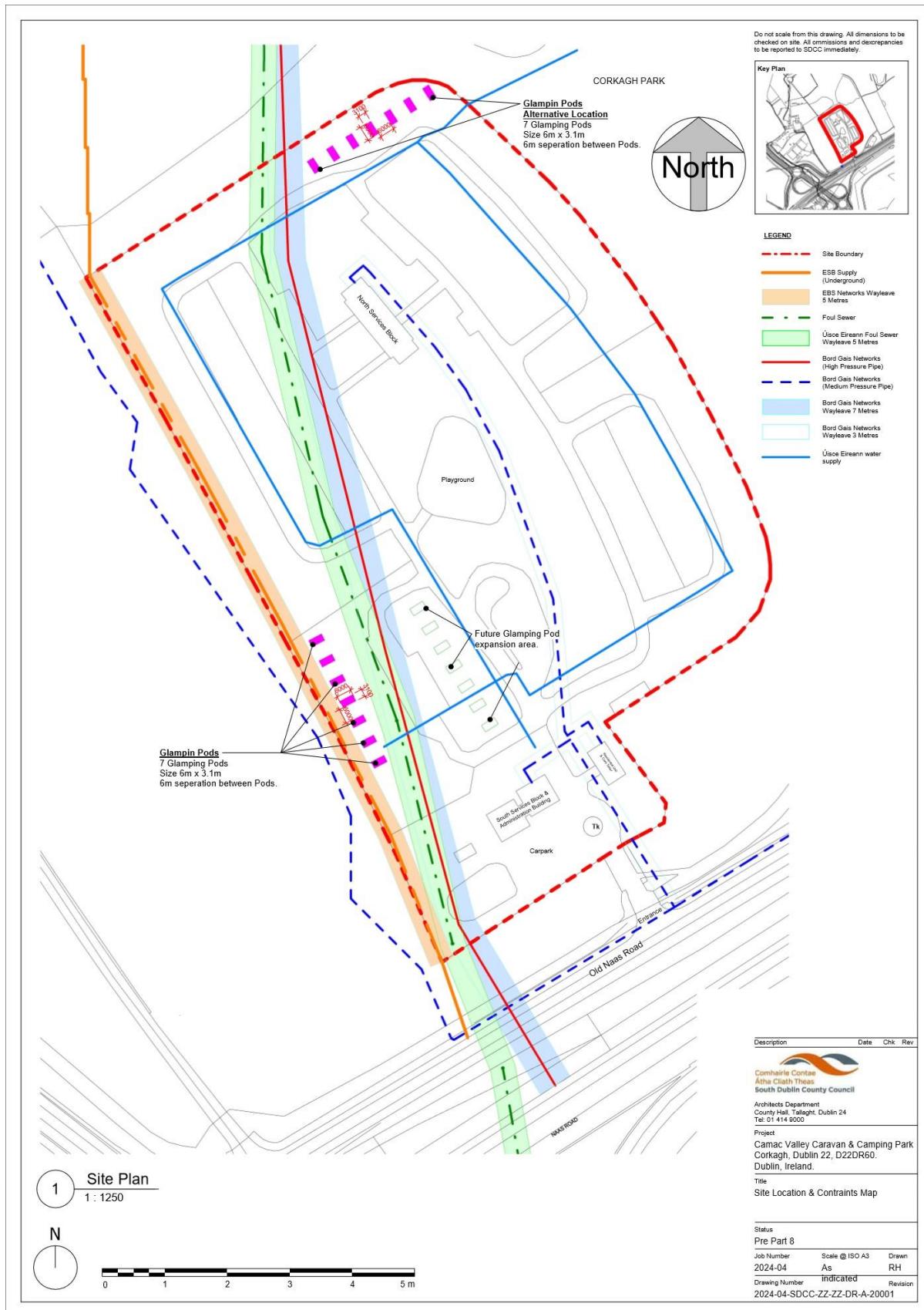
Timber Kit Buildings	<b>HEAD</b> <b>DUBLIN</b> <a href="#">015310502</a>	<b>OFFICE</b>	<a href="#">Camping &amp; Glamping Pods - Timber Kit Buildings</a>	 <p><b>Camping Pod 400 Log Cabin 2.33m X 4.00m</b></p> <p><b>SKU:</b> 43.7030    <b>Cat. No:</b> P015104</p> <p>Log cabin camping pod measuring 2.33m x 4.00m in 28mm wall logs.....</p> <p> <b>Log Thickness</b> 28mm</p> <p> <b>Roof Type</b> Curved</p> <p>€8,068.92 <b>€5,680.36</b> Save: €2,388.56</p>	On offer at the minute for €5,680.36 or cabin that is 2.33m x 4.80m is €6,972.68
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Wigwam Cabins	<p><b>Sales Contact Number:</b> <a href="tel:01313764257">0131 376 4257</a></p> <p><b>Sales Email:</b> <a href="mailto:sales@wigwamcabins.com">sales@wigwamcabins.com</a></p>	<p><a href="#">UK Glamping Pod &amp; Lodge Manufacturer   Wigwam® Cabins (wigwamcabins.com)</a></p>	<p><b>Wigwam Classic 1</b></p> <p><b>2 Berth Ensuite</b></p> <p>The Couples Market is booming within the Glamping Industry and our newly launched for 2023, Classic 1, perfectly encapsulates the customer requirements of this profitable sector whilst simultaneously offering the site owner an affordable ensuite Pod. With over 11m<sup>2</sup> of internal space, this charming 4-season cabin packs a real punch, with full ensuite facilities, a compact kitchen and a full size sofa bed. For those wanting to offer their guests a more luxurious option then a fully glazed end panel is available to help flood the Pod with light and to 'bring the outside in'!</p> <p>From £21,564 ex VAT</p>	£21,564 ex VAT
Luxury Glamping Pods – Arch Leisure	<p>Email: <a href="mailto:info@archleisure.co.uk">info@archleisure.co.uk</a></p> <p>Telephone: 0044 115 828 4918</p>	<p><a href="#">One Bedroom Luxury Glamping Pods For Sale - Luxury Glamping Pods (archleisure.co.uk)</a></p>		Price £49,699 + VAT & delivery or £46,899 without the furniture and curtains etc. Base model without

				extras £42,771+ 5% VAT
Omnipods & Cabins	<b>t:</b> 07729 383306 <b>e:</b> <a href="mailto:info@omniaccess.co.uk">info@omniaccess.co.uk</a>	<a href="#">Glamping Pods &amp; Cabins Made In The UK   Omnipods   Omnipods &amp; Cabins UK (omnipodsandcabins.co.uk)</a>		The Omnipod Piccolo, is one of our fully accessible pods, the perfect size for a home office or garden pod, with space for two adults and two children on a sofa bed, is £42,500

				plus delivery and 5% VAT.
Pod Glamping Ireland	<b>Enquiries via email:</b> <a href="mailto:podglampingireland@gmail.com">podglampingireland@gmail.com</a> <b>m</b> <b>Enquiries via Phone:</b> <a href="tel:+44(0)7928197961">+44(0)7928197961</a>	<a href="#">Contact — POD GLAMPING IRELAND</a>		Brochure: <a href="#">Modern Marketing Proposal (squarespace.com)</a> Costs from £8,995 - £14,995
Glamping Pods.ie	<b>northburgjoinery@gmail.com</b> <b>083 025 7209</b> <b>Northburg Joinery</b> <b>Greencastle, Co. Donegal</b>	<a href="http://glampingpods.ie">glampingpods.ie</a>		

## Appendix 2 – Proposed Layout of Glamping Pods



## Appendix 3 – Site Photographs



Photo 1. Three Leyland Cypress trees approx. 6-9m tall would require felling at Location A



Photo 2. Amenity grassland was very species poor and was highly maintained across the park.



*Photo 3. Treeline which is part of site boundary at Location A was 8-10m tall, and will not be affected by the proposed development*



*Photo 4. Location B consisted of a series of camping bays with WS3 hedging for separation*



*Photo 5. Birch trees and hedging are proposed to remain if proposed development is located at Location B*



*Photo 6. Hedging was mainly non-native species that will not be affected by proposed development*