

South Dublin County
Habitats Directive Assessment

Screening of the
Grange Castle Project for
Appropriate Assessment

in accordance with the requirements of
Article 6(3) of the EU Habitats Directive

July 2017

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SECTION 1

1.1 INTRODUCTION

This document represents South Dublin County Council's Appropriate Assessment (AA) Screening Report for the Grange Castle project in South Dublin County. This report has been prepared in accordance with the requirements of Article 6(3) of the Habitats Directive (Directive 92/43/EEC).

Council directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna – 'The Habitats Directive' was transposed into Irish law by the European Community (Natural Habitats) Regulations 1997 (S.I. No. 94/1997).

Article 6 (3) of the 'Habitats' Directive 92/43/EEC states 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 sites 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 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 economic or social nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

Article 6(3) therefore requires that an "appropriate assessment" be undertaken for any plan or project which is not necessary for the management of a Natura 2000 site and which has the potential to have an impact on the integrity of a Natura 2000 site *i.e.* a Special Area of Conservation (SAC) or a Special Protection Area for Birds (SPA), or on the conservation objectives of such a site.

Within the area of South Dublin County, there are two areas designated as SACs: Glenasmole Valley SAC and a portion of the larger Wicklow Mountains SAC that extends into the county area. There is also one SPA - a portion of the Wicklow Mountains SPA. These three Natura 2000 sites are all located in the Dublin Mountains, bordering with County Wicklow.

In effect, the Commission's ruling requires a robust and thorough application by all consent authorities, including planning authorities, of the requirement to undertake an

appropriate assessment of the ecological implications of any plan or project, whether within or outside of a designated site, which may impact upon its stated conservation objectives.

1.2 METHODOLOGY

This Screening Statement for Appropriate Assessment has been prepared with regard to the following guidance documents where relevant:

- *Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission Environment Directorate General, 2001)
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC* (EC Environment Directorate General, 2000)
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities Circular NPW 1/10 & PSSP 2/10*
- *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*. (Department of Environment, Heritage and Local Government, 2010 revision)
- *Guidelines for Good Practice, Appropriate Assessment of Plans under Article 6(3) Habitats Directive* (International Workshop on Assessment of Plans under the Habitats Directive, 2011)
- *Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Over-riding Public Interest, Compensatory Measures, Overall Coherence.* Opinion of the European Commission (European Commission, January 2007)

There are four stages in an Appropriate Assessment as outlined in the European Commission Guidance Document (2001), summarised below:

• Stage 1: Screening

The first step to establishing if an appropriate assessment is required is referred to as 'screening' and its purpose is to determine on the basis of a preliminary assessment and objective criteria if the plan or project, alone or in combination with other plans or projects, could have a significant effect on a Natura 2000 site in view of the sites conservation objectives. The process identifies any likely impacts upon a Natura 2000 Site, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

• Stage 2: Appropriate Assessment

This step considers the impact of the project or plan on the integrity of the Natura 2000 Site, either alone or in combination with other plans or projects, to the site's structure and function and its conservation objectives. Additionally, where there are deemed to be adverse impacts, an assessment of the potential mitigation of those impacts is considered.

- **Stage 3: Alternative Solutions**

This stage examines alternative means of achieving the objectives of the project or plan that aim to avoid adverse impacts on the integrity of the Natura 2000 site.

- **Stage 4: Imperative Reasons of Overriding Public Interest**

This stage is the main derogation process outlined in Article 6(4) which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project which will have adverse effects on the integrity of a Natura 2000 site to proceed.

This screening exercise was based on a desk-top study drawing on information sources which included the following: NPWS on-line data for Natura 2000 sites; Ordnance Survey of Ireland mapping and aerial photography; geological, hydrological and soils data available from GSI; water quality data (EPA and SDCC); in-house data arising from site visits to proposed Project lands.

The current documents present the results of the first of these four stages *i.e.* Screening, to determine if the Grange Castle project will or will not have an impact on a Natura 2000 site. Its conclusion that significant impacts on Natura 2000 sites will not occur as a result of this Project, resulted in the screening process terminating at Stage 1.

SECTION 2 SCREENING MATRIX

2.1 DESCRIPTION OF THE PLAN OR PROJECT

2.1.1 Context

South Dublin County Council intends to (i) conserve Grange castle as a ruin to allow guided access to it by members of the public and to (ii) do landscaping works for a new public park around the castle to explain the history of the site and the area of south west county Dublin. (Figure 1).



Fig.1. An aerial view of the proposed development site from the south. (Source: Image from the website “bingmaps.com” on 7/11/2016)

Purpose of proposed works

The purpose of the works is (i) to conserve the castle as a ruin and (ii) to make a new public park around the castle which will provide a new setting that will enhance its presentation and people’s understanding of the site. All works will be discussed and agreed with South Dublin County Council’s Architectural Conservation officer. The works will be carried out under the direction of a conservation accredited structural engineer and all excavation works will be monitored by an archaeologist. An ecological consultant has been appointed to prepare a Habitats Assessment and to advise on any potential impact the project could have on flora and fauna and to advise on mitigations.

Description of proposed works

The project proposes (i) conservation of Grange castle as a ruin, including clearance of weeds, ivy and other vegetation from the buildings where these are causing damage, stabilisation of the existing building fabric including consolidation, repair of wall tops and conservation of all fabric, and (ii) the clearance of modern debris from around the site, conservation of the existing boundary walls and landscape features

including the historic tree lined town land boundary and creation of a new public park around the castle.

Grange castle was built about 1580, one of several castles including the nearby Nangor castle (demolished), Adamstown castle, Cheeverstown, Lucan, Belgard, Templeogue and Rathfarnham that were built during the fifteenth and sixteenth centuries around the edge of the Pale, to defend this sphere of Anglo-Norman control and influence around Dublin that expanded and contracted according to political events.

The castle or fortified house with its bawn was also central to the organisation of a farm, a site of 87 acres recorded in the Down Survey of 1650. The fortunes of the castle and its farm changed over time; an extension to the west side of the castle doubled its size in the mid-eighteenth century, the construction of the Grand Canal in the late eighteenth century isolated the farm and frustrated access to it. It continued to be used as a farm and the castle was occupied as a family home until the late 1980s when it was acquired by Dublin County Council. The vacant castle and outbuildings were vandalised, there was no maintenance, and the buildings' condition rapidly declined. The outbuildings were demolished in the 1980s and 1990s and a fence was erected around the standing remains of the castle.

2.1.2 Location and description of the Project site

The site is located in south-west county Dublin. Grange castle is located in the townland of Grange, and the barony of Newcastle. Its ordnance survey X, Y Coordinates are 703857, 731880 and the OS sheet reference number is 3325-B. The site is in flat, low-lying ground. The castle is a rectangular tower house with a square tower that projects to the N in the NE corner. The tower house is three storeys high. The walls are plastered but where stonework is visible it is coursed limestone with roughly dressed quoins.

The site of Grange castle has been travelled over by people, occupied and used as a burial ground for at least 3000 years. There are the remains of a Neolithic house to the north-east of Grange castle, a ring-mound to the east, near the subterranean remains of Nangor castle to the south-east. The name 'Grange' originated in the 12th century when the lands of Grange and Kilmahuddrick fell under the ownership of the Cistercian monastery of St. Mary's in Dublin. King Henry II confirmed ownership of the lands to St. Mary's in two charters dated 1174 and 1179. Grange was originally known as Ballymacheilmer, later to become 'the Grange of Ballymacheilmer'. Grange is a word used to describe farm lands associated with a monastery, or owned by a monastery as in this case.

Grange castle was built at the western edge of the Pale about 1580 as a fortified house with a bawn addressing the Green road, an important route in mediaeval times that extended from Dublin in a south-westerly direction towards Newcastle in west county Dublin. The castle was one of several that acted as defensive lookouts between the Pale and the plains to the west and mountains to the south, between the opposing cultures and languages of the Gaelic Irish and the urbanised Anglo-Norman settlers. Originally the bawn was developed as a walled defensive courtyard with the tower house within it set back from the road or access point. The bawn was often lined with agricultural outbuildings, originally usually built of timber and wattle and daub.

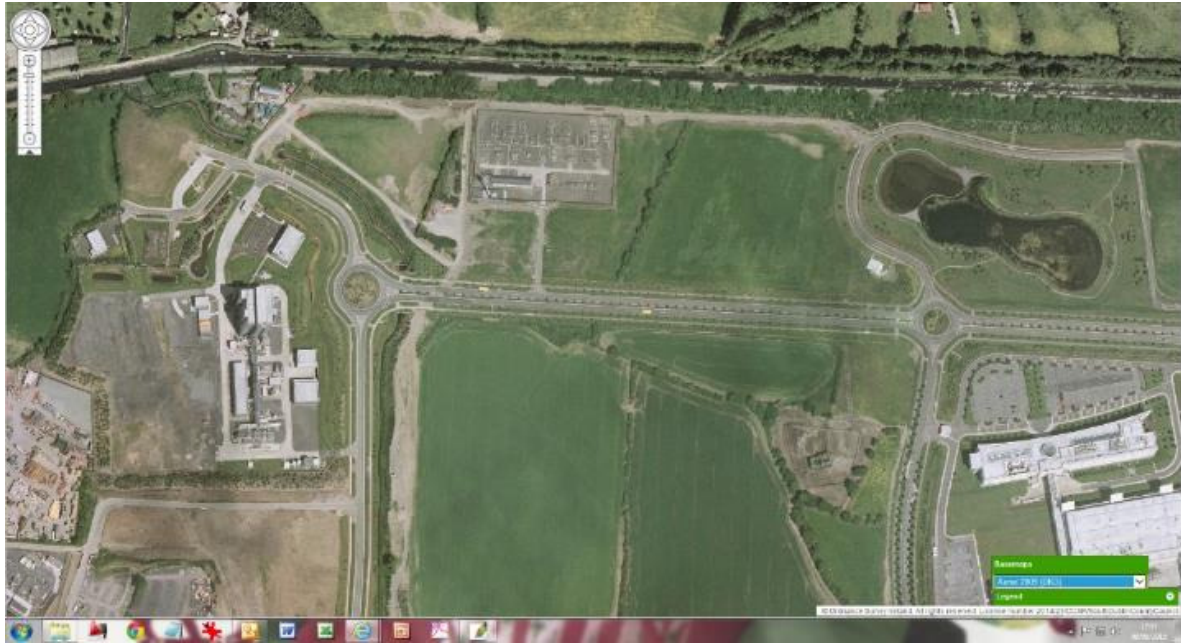


Fig. 2. An aerial view of the proposed development site.

2.1.3 Vision and Rationale for the Plan Lands

At present Grange castle is surrounded by a steel palisade fence. This was installed to limit access to the castle by vandals and accidental trespass, and to prevent injury or death from falling debris. South Dublin County Council has carried out an assessment of the condition of the castle and some of the extensive vegetation growth was removed in 2016. A conservation engineer has been appointed to advise the council on the conservation works needed to make the castle safe and accessible and to secure its future. A landscape architect has been appointed to advise the council on the design and construction of the new park which will involve conservation of the historic features of the site: the boundary walls, fragments of outbuildings and the boundaries. There are two proposals: (i) to conserve the castle as a ruin, and (ii) to develop a new public park on the open space around the castle.

In summary the proposed conservation works to the castle include the removal of trees, ivy and shrubs, stabilisation of the existing fabric by surface consolidation, repair of wall tops, localised raking out and re-pointing of weak or eroded mortar joints and possible grouting of weakened wall cores, dressing of wall tops with a lime mortar fillet flaunching, bracing of openings and shoring of walls, architectural conservation monitoring of debris clearance and recording of significant details. Permanent bracing and shoring of the walls with new structural steelwork will provide the lateral stability previously provided by the interim timber floors and roof structures, all of which have been lost. The structural steelwork will be built inside the castle so that it won't be visible from outside and will incorporate some railed walkways to facilitate access to the upper walls of the castle for views and also for maintenance and repair of the castle in the future. These walkways will be accessed by the existing stone stairs in the north-eastern flanker. The works will be guided by the international Charters and by good conservation practice. The conservation works

are being designed in detail at present and these designs can be made available to the National Monuments Service before works commence.

The new public park is explained in detail in the enclosed Grange Castle Landscape Design Rationale by Brady Shipman Martin. In summary, the design objectives are

- (i) to enhance the historic setting of the 16th century tower house,
- (ii) to provide a space that reflects the contemporary character of the Business Park,
- (iii) integration of biodiversity into the design proposals,
- (iv) to enhance and review potential to highlight historic features such as the barony boundary,
- (v) to provide a quality space with a strong sense of place, and
- (vi) to include opportunities for recreational use and establish pedestrian links to the park.

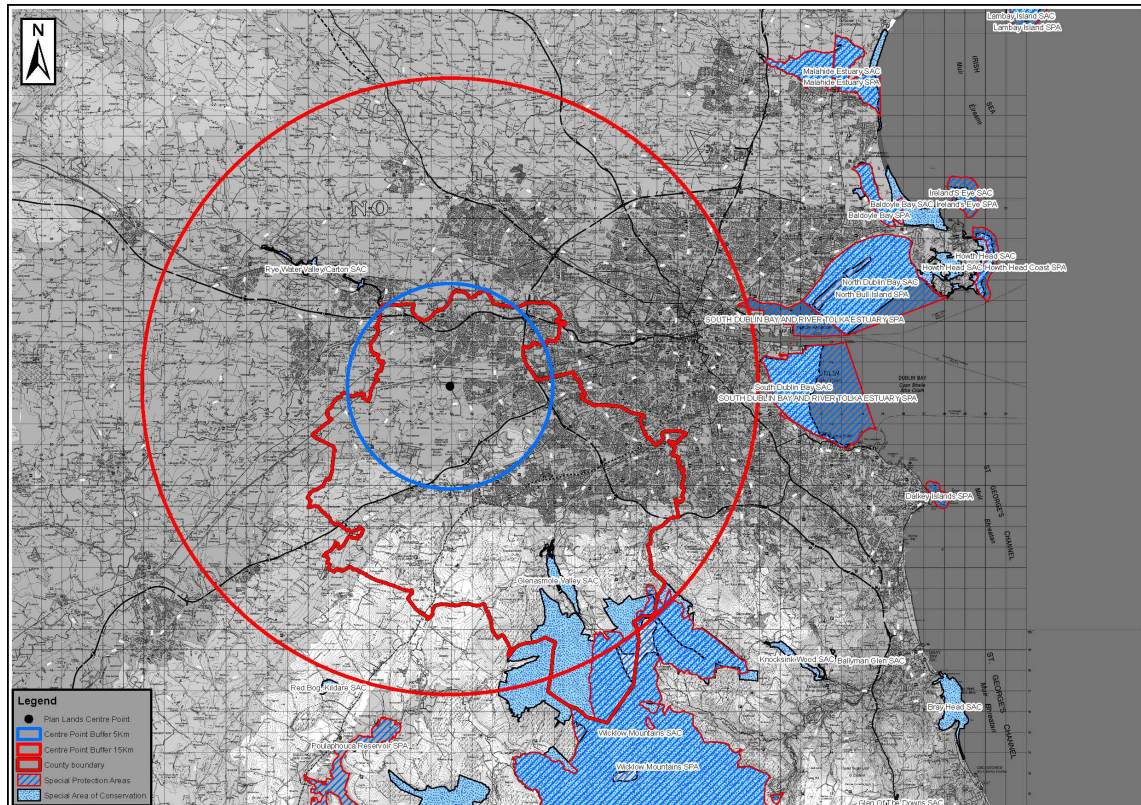
The design is informed by an analysis of the site, approaches to it, views of it, and analysis of the existing ground and consideration of the significant remaining features. The landscape design strategy interprets the physical and spatial setting of the heritage elements within the park and incorporate these into the redesign. The enclosed Tree Survey report has identified necessary works to the historic townland and barony boundaries, including thinning out and felling of some of the trees. The proposed conservation works and landscape works will recognise the significance of the castle and its site to the area and to the citizens of south county Dublin, and also their legal status as a Recorded Monument and Protected Structure.

2.2 ASSESSMENT OF RELEVANCE OF PROPOSED PLAN TO NATURA 2000 SITES

The Grange castle project is not directly connected with or necessary to the management of Natura 2000 sites in South Dublin County or elsewhere.

Best practice recommends assessing Natura 2000 sites located within 15km of a proposed plan or project (see Figure 3). These Natura 2000 sites are listed in Table 1.

Figure 3 Relevance of Natura 2000 sites to the Grange castle project Lands



There are no Natura 2000 sites located either within or directly adjacent to the proposed Project lands.

For the Grange castle project lands, the sites of relevance requiring screening assessment are the following:

- three Natura 2000 sites within South Dublin County (Glenasmole Valley SAC, Wicklow Mountains SAC, and Wicklow Mountains SPA)
- Natura 2000 sites located downstream of the Project lands in Dublin Bay, namely South Dublin Bay and River Tolka Estuary SPA
- one site in County Kildare (Rye Water/Carton SAC)

There are no direct ecological or hydrological links (source-pathway-receptors) between the proposed Grange castle project lands and any of these Natura 2000 sites. Negative impacts on these sites are therefore highly unlikely by virtue of distance

from the Grange castle project site, the extent and the nature of the works proposed at the project site, and the absence of source-pathway-receptors.

TABLE 1. Natura 2000 sites within 15km of the proposed Grange castle project site.

Natura 2000 sites within South Dublin County	Site Code	Other Natura 2000 sites within 15km of proposed Project site	Site Code
Glenasmole Valley SAC Wicklow Mountains SAC Wicklow Mountains SPA	001209 002122 004040	South Dublin Bay and River Tolka Estuary SPA	004024
		Rye Water Valley/Carton SAC, Co. Kildare	001398

It is highly unlikely by virtue of distance from the Grange castle project site and the absence of source-pathway-receptors.

Within South Dublin County, the Grange castle project lands are also distant from the Glenasmole Valley SAC which is approximately 10km SE of the plan lands. The project lands are also approximately 16km NW of the Wicklow Mountains SAC and Wicklow Mountains SPA. As the Grange castle project lands are located at such a distance, and in a separate river catchment area to these three Natura 2000 sites, there are no relevant source-pathway-receptors connecting the Project lands to these Natura 2000 sites. Negative impacts on these Natura 2000 sites are therefore also highly unlikely.

There are no rivers or streams on the proposed project lands which could act as a source-pathway-receptor between the project lands and the suite of Natura 2000 sites downstream of the Project site. No public waste water connections are proposed and it is intended to attenuate any surface water on the site in an ecological wetland habitat.

2.3 AVOIDANCE OF IMPACTS

For the Grange castle project, its broad objectives were assessed to determine whether or not the potential existed for these to have a significant negative impact on the Natura 2000 network. The nature of the proposed development centres on the conservation and stabilisation of one existing building on the site, and the creation of new public spaces and public gardens in order to create a new public park for south county Dublin.

An ecological assessment has also been undertaken on the proposed project site so as ensure that there will be no negative impacts on protected species such as bats by virtue of the proposed works to the site buildings and demolition activities. Active bat roosts were detected in the area but not from the castle itself, and mitigation measures proposed in the ecological survey will be adhered to in order to enhance general biodiversity and potential bat usage of the site into the future.

The nature and extent of these proposed project activities, in conjunction with the over-arching policies in the South Dublin County Development Plan 2016 - 2022 which act to protect the County's environment (including Natura 2000 sites) are highly unlikely to result in negative impacts on Natura 2000 sites within a distance of 15km from the Grange castle project site.

Adherence to the County Development Plan's protective policies and objectives (relevant objectives listed in Appendix 3), and to the ecological protection and mitigation measures proposed and overseen by a qualified ecologist, will therefore act to avoid significant downstream impacts on any Natura 2000 site.

2.4 OTHER INSTRUMENTS CONSIDERED

The proposed Grange castle project was considered in the context of a range of other higher level measures, all of which assist in mitigating any potential impacts of the proposed plan. These include the following National Plans, Regional Plans and Local Plans: Sustainable Development – A Strategy for Ireland (1997); National Spatial Strategy 2002-2020; National Climate Change Strategy, 2000; National Heritage Plan (2002); The Planning System and Flood Risk Management Guidelines 2009; Regional Planning Guidelines 2010 – 2020: A Platform For Change And Transport 21; Sustainable Residential Development In Urban Areas 2009; The Retail Planning Strategy For The Greater Dublin Area (2008-2016); South Dublin County Council Development Plan 2010 – 2016; Green City Guidelines' (UCD Urban Institute Ireland 2008).

SECTION 3 DESCRIPTION OF NATURA 2000 SITES

There are no Natura 2000 sites located within the proposed Grange castle project site. The Natura 2000 sites located within 15km of the Project site are listed in Table 1. There are also two proposed Natural Heritage Area (pNHA) in the vicinity of the project lands. The Grand Canal pNHA (Site Code: 002104) is located c.0.5km to the north of the project site the Dodder Valley pNHA (Site Code: 000991) is located c. 8km south east of the project lands. There are no other designated biodiversity areas in the vicinity of the proposed Grange castle project site which have a recognised National, European Union or International protection status.

Full site descriptions of the Natura 2000 sites listed in Table 1 are provided in Appendix 1. A summary of the main elements of interest for each of these sites follows:

Glenasmole Valley SAC contains a high diversity of habitats and plant communities and lists three habitats listed on Annex I of the EU Habitats Directive: petrifying springs with tufa formation, semi-natural dry grassland and scrubland facies on calcareous substrate (*Festuco-Brometalia*) (important orchid sites), and *Molinia* meadows on calcareous, peaty, or clayey-silt-laden soils (*Molinion caeruleae*). Both petrifying springs and orchid-rich calcareous grasslands also qualify as Priority Habitats under the Habitats Directive. The presence of four Red Data Book plant species further enhances the value of the site as does the presence of populations of several mammal and bird species of conservation interest. The River Dodder flows through the valley and has been impounded here to form two reservoirs which supply water to south Dublin.

Draft Conservation Objectives:

- 1 To maintain the Annex 1 habitats for which the cSAC has been selected at favourable conservation status – *Petrifying springs with tufa formation, Semi-natural dry grassland and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (*important orchid sites), *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)
- 2 To maintain the extent, species richness and biodiversity of the entire site.
- 3 To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

Wicklow Mountains SAC is an important complex, extensive, upland site covering much of the Wicklow Mountains and a portion of the Dublin Mountain range. Within the boundaries of South Dublin County, the SAC encompasses the mountains of Ballymorefinn, Corrig, Kilakee, and Cruagh, stretching south to the summit of Kippure Mountain at the border with County Wicklow. While the entire SAC lists ten habitats listed in Annex I of the EU Habitats Directive, the vegetation within the South Dublin County portion of the site mainly provides good examples of the typical upland habitats of heath, blanket bog and upland grassland. Several rare, protected plant and animal species also occur in this SAC.

Draft Conservation Objectives:

- 1 To maintain the Annex 1 habitats for which the cSAC has been selected at favourable conservation status:– Oligotrophic to mesotrophic standing waters

with vegetation of the *Littorelletea uniflorae* and/or of the Isoëto-Nanojuncetea; Natural dystrophic lakes and ponds; Northern Atlantic wet heaths with *Erica tetralix*; European dry heaths; Alpine and Boreal heaths; Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe); Blanket bog; Siliceous scree of the montane to snow levels; (*Androsacetalia alpinae* and *Galeopsietalia ladani*); Calcareous rocky slopes with chasmophytic vegetation; Siliceous rocky slopes with chasmophytic vegetation; Old sessile oak woods with *Ilex* and *Blechnum* in British Isles.

- 2 To maintain the Annex 2 species for which the cSAC has been selected at favourable conservation status: - *Lutra lutra*
- 3 To maintain the extent, species richness and biodiversity of the entire site.
- 4 To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

Wicklow Mountains SPA (Site Code 4040) is an extensive upland site, comprising a substantial part of the Wicklow Mountains (See Appendix for full site description). The site, which is within the Wicklow Mountains National Park, is fragmented into about twenty separate parcels of land. Much of the site is State-owned and managed for nature conservation based on traditional land uses for the uplands. The site is of high ornithological importance as it supports very good examples of upland and woodland bird communities, several of which are very rare at a national level. Two species, Ring Ouzel and Red Grouse, are Red-listed and their status is of high conservation concern.

Main Conservation Objective:

To maintain the special conservation interests for the SPA at favourable conservation status – Merlin, Peregrine.

Rye Water Valley/Cartron (Site Code 001398)

This site is located between Leixlip and Maynooth in Co. Kildare. It extends along the Rye Water, a tributary of the River Liffey. The woodlands at Carton Demesne are the site of a rare fungus, *Diderma deplanatum* and also support birds such as Blackcap, Woodcock, and Long-eared Owls. On or about the lake, birds such as Little Grebe, Coot, Moorhen, Tufted Duck, Teal, and Kingfisher have been recorded. Kingfisher are listed in Annex 1 of the EU Birds Directive. The mineral spring occurring on the site is also listed as an Annex 1 habitat of the EU Habitats Directive. The Rye Water is a spawning ground for Trout and Salmon while White-clawed crayfish *Austropotomobius pallipes* has been recorded at Leixlip. Rare snail species and dragonflies also occur in the marsh vegetation near to Louisa Bridge. The main importance of the site lies in the presence of several rare and threatened plant and animal species and of a rare habitat – thermal, mineral, petrifying spring.

Draft Conservation Objectives:

1. To maintain the Annex 1 habitats for which the cSAC has been selected at favourable conservation status:– *Petrifying springs with tufa formation
2. To maintain the Annex 2 species for which the cSAC has been selected at favourable conservation status: - *Vertigo angustior*, *Vertigo moulinsiana*
3. To maintain the extent, species richness and biodiversity of the entire site.

4. To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

South Dublin Bay and River Tolka Estuary SPA (Site Code 4024) comprises a substantial part of Dublin Bay. It includes the intertidal area between the River Liffey and Dun Laoghaire, and the estuary of the River Tolka to the north of the River Liffey, as well as Booterstown Marsh. A portion of the shallow marine waters of the bay is also included (See Appendix for full site description).

The site is an important site for wintering waterfowl, being an integral part of the internationally important Dublin Bay complex. It is of international importance for Light-bellied Brent Goose and of national importance for nine other waterfowl species. As an autumn tern roost, it is also of international importance. Furthermore, the site supports a nationally important colony of Common Tern. All of the tern species using the site are listed on Annex I of the E.U. Birds Directive, as are Bartailed Godwit and Mediterranean Gull.

Main Conservation Objective:

To maintain the special conservation interests for the SPA at favourable conservation status – Light-bellied Brent Goose, Oystercatcher, Ringed Plover, Golden Plover, Knot, Sanderling, Dunlin, Bar-tailed Godwit, Redshank, Black-headed Gull, Roseate Tern, Common Tern, Arctic Tern, and Wetland and Waterbirds.

SECTION 4 ASSESSMENT OF POTENTIAL IMPACTS

4.1 ASSESSMENT OF PROPOSED GRANGE CASTLE PROJECT

In Section 2.2 (Assessment of relevance of proposed Plan to Natura 2000 Sites), no significant impacts to Natura 2000 sites were identified based on the nature and extent of the proposed works, distance from Natura 2000 sites, and the absence of any ecological or hydrological pathways.

The proposed Project was assessed following the factors as listed: - size and scale; land-take; distance from the Natura 2000 site or key features of the site; resource requirements (water abstraction etc.); emissions (disposal to land, water, or air); excavation requirements; transportation requirements; duration of construction, operation, decommissioning, etc.; habitat area; disturbance to key species; habitat or species fragmentation; species density; changes in key indicators of conservation value (water quality etc.); climate change; key relationships that define the structure of the site; key relationships that determine the function of the site.

The nature and extent of the works proposed, in conjunction with the over-arching policies of the South Dublin County Development Plan 2016 -2022 within which framework the Grange castle project is placed, all serve to ensure that no significant negative impact arises from the proposed Plan.

4.2 CUMULATIVE IMPACTS

The National Spatial Strategy 2002-2020 and the National Development Plan 2007-2013 set the national planning framework within which the proposed Grange castle project has been prepared. Within South Dublin County itself, the County Development Plan 2016-2022 provides the local framework within the regional approach of the Regional Planning Guidelines 2010-2020. These documents have been subject to screening for Appropriate Assessment to ensure no significant impacts are likely. The proposed Grange castle project has been prepared taking the objectives and policies of these plans into account.

The assessment for the proposed Grange castle project indicates there will be no significant impacts arising from this plan. In relation to potential cumulative impacts from the proposed Project in conjunction with other plans and projects, it is a requirement that each of these, in addition to the proposed Project itself, will all be subject to screening for appropriate assessment to ensure there will be no significant negative impact on Natura 2000 sites. Taken together, adherence to this required approach will ensure no cumulative impacts will arise from these plans.

SECTION 5 CONCLUSIONS

This screening report has evaluated the proposed Grange castle project to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of the Plan's implementation. The report finds that, due to the nature and extent of the proposed works, the absence of any ecological or hydrological links, and the distance from any Natura 2000 site, the Grange castle project either on its own or in combination with other plans and projects, shall not give rise to significant effects on the integrity of any Natura 2000 site.

The Appropriate Assessment procedure for this proposed Plan is therefore concluded at this Screening Stage and a detailed (Stage 2) Appropriate Assessment is not required.

Appendix 1

Natura 2000 descriptions (as listed in Table 1)

SITE SYNOPSIS

SITE NAME: GLENASMOLE VALLEY

SITE CODE: 001209

Glenasmole Valley in south Co. Dublin lies on the edge of the Wicklow uplands, approximately 5 km from Tallaght. The River Dodder flows through the valley and has been impounded here to form two reservoirs which supply water to south Dublin. The non-calcareous bedrock of the Glenasmole Valley has been overlain by deep drift deposits which now line the valley sides. They are partly covered by scrub and woodland, and on the less precipitous parts, by a herb-rich grassland. There is much seepage through the deposits, which brings to the surface water rich in bases, which induces local patches of calcareous fen and, in places, petrifying springs, a priority habitat listed on Annex I of the EU Habitats Directive.

Examples of calcareous fen and flush areas occur between the two reservoirs, where sedges (*Carex flacca* and *Carex panicea*) are joined by such species as Grass of Parnassus (*Parnassia palustris*), Few-flowered Spike-rush (*Eleocharis quinqueflora*), Zig-zag clover (*Trifolium medium*) and the scarce Fen Bedstraw (*Galium uliginosum*).

Orchid-rich grassland occurs in the drier parts of this site and in places grades into *Molinia* meadow, both of these habitats are listed on Annex I of the EU Habitats Directive. Species recorded in these habitats include Frog Orchid (*Coeloglossum viride*), Northern Marsh-orchid (*Dactylorhiza purpurella*), Fragrant Orchid (*Gymnadenia conopsea*), Marsh Helleborine (*Epipactis palustris*), Early-purple Orchid (*Orchis mascula*) and Greater Butterfly Orchid (*Platanthera chlorantha*).

Two Red Data Book species have also been found here, Green-winged Orchid (*Orchis morio*) and Small-white Orchid (*Pseudorchis albida*). The sward includes Sweet Vernal-grass (*Anthoxanthum odoratum*), Creeping Bent (*Agrostis stolonifera*) and Crested Dog's-tail (*Cynosurus cristatus*). Other species which occur are Common Bird's-foot-trefoil (*Lotus corniculatus*), Kidney Vetch (*Anthyllis vulneraria*), Common Restharrow (*Ononis repens*), Yellow-wort (*Blackstonia perfoliata*) and Autumn Gentian (*Gentianella amarella*).

Woodland occurs in patches around the site. On the east side of the valley, below the northern lake, a Hazel (*Corylus avellana*) wood has developed on the unstable calcareous slopes and includes Ash (*Fraxinus excelsior*), Downy Birch (*Betula pubescens*), Goat Willow (*Salix caprea*) and (Irish) Whitebeam (*Sorbus hibernica*). Spring Wood-rush (*Luzula pilosa*), Wood Speedwell (*Veronica montana*) and Brambles (*Rubus fruticosus* agg.) are included in the ground flora.

Wet semi-natural broad-leaved woodland is also found around the reservoirs and includes Alder (*Alnus glutinosa*) and Willow (*Salix* spp.) with Yellow Iris (*Iris pseudacorus*), Horsetail (*Equisetum* spp.), Brambles and localised patches of Japanese Knotweed (*Reynoutria japonica*), an introduced species.

The lake shore vegetation is not well developed, which is typical of a reservoir. There are occasional patches of Canary-grass (*Phalaris arundinacea*) and Purple-loosestrife (*Lythrum salicaria*), which are more extensive around the western shore of the

northern lake, along with Common Marsh-bedstraw (*Galium palustre*) and Water Mint (*Mentha aquatica*). Other vegetation includes Shoreweed (*Littorella uniflora*) and the scarce Water Sedge (*Carex aquatilis*).

As well as the Green-winged Orchid and Small-white Orchid, two other threatened species which are listed in the Irish Red Data Book also occur in the site, Yellow Archangel (*Lamiastrum galeobdolon*) and Yellow Bird's-nest (*Monotropa hypopitys*).

The site provides excellent habitat for bat species, with at least four species recorded: Pipistrelle, Leisler's, Daubenton's and Brown Long-eared Bat. Otter occurs along the river and reservoirs. These habitats also support Kingfisher, an Annex I species under the EU Birds Directive.

Glenasmole Valley contains a high diversity of habitats and plant communities, including three habitats listed on Annex I of the EU Habitats Directive. The presence of four Red Data Book plant species further enhances the value of the site as does the presence of populations of several mammal and bird species of conservation interest.

03.09.2001

SITE SYNOPSIS

SITE NAME: WICKLOW MOUNTAINS

SITE CODE: 002122

This site is a complex of upland areas in Counties Wicklow and Dublin, flanked by Blessington Reservoir to the west and Vartry Reservoir in the east, Cruagh Mt. in the north and Lybagh Mt. in the south. Most of the site is over 300m, with much ground over 600m and the highest peak of Lugnaquilla at 925m.

The Wicklow Uplands comprise a core of granites flanked by Ordovician schists, mudstones and volcanics. The form of the Wicklow Glens is due to glacial erosion. The Wicklow Mountains are drained by several major rivers including the Dargle, Liffey, Dodder, Slaney and Avonmore. The river water in the mountain areas is often peaty, especially during floods.

The topography is typical of a mountain chain, showing the effects of more than one cycle of erosion. The massive granite has weathered characteristically into broad domes. Most of the western part of the site consists of an elevated moorland, covered by peat. The surrounding schists have assumed more diverse outlines, forming prominent peaks and rocky foothills with deep glens. The dominant topographical features are the products of glaciation. High corrie lakes, deep valleys and moraines are common features of this area. The substrate over much of the area is peat, usually less than 2m deep. Poor mineral soil covers the slopes and rock outcrops are frequent.

The vegetation over most of the site is a mosaic of heath, blanket bog and upland grassland (mostly on peaty soil, though some on mineral soil), with stands of dense Bracken (*Pteridium aquilinum*) and small woodlands mainly along the rivers. Mountain loughs and corrie lakes are scattered throughout the site. The site supports many habitats that are listed on Annex I of the E.U. Habitats Directive.

The two dominant vegetation communities in the area are heath and blanket bog. Heath vegetation, with both wet and dry heath well represented, occurs in association with blanket bog, upland acid grassland and rocky habitats. The wet heath is characterised by species such as Ling (*Calluna vulgaris*), Cross-leaved Heath (*Erica tetralix*), Cottongrasses (*Eriophorum* spp.), Tormentil (*Potentilla erecta*), Mat-grass (*Nardus stricta*), Bent grasses (*Agrostis* spp.) and bog mosses (*Sphagnum* spp.). In places the wet heath occurs in conjunction with flush communities and streamside vegetation, and here species such as Heath Rush (*Juncus squarrosus*) and *Carex* spp. are found. Dry heath at this site is confined to shallow peaty soils on steep slopes where drainage is better and particularly in sheltered conditions. It is characterised by species such as Ling, Gorse (*Ulex* spp.), Bell Heather (*Erica cinerea*), Bilberry (*Vaccinium myrtillus*), Purple Moor-grass (*Molinia caerulea*) and lichens (*Cladonia* spp.). In places the heath grades into upland grassland on mineral soil, some examples of which correspond to the E.U. Habitats Directive Annex I priority habitat species-rich *Nardus* grassland.

Blanket bog is usually dominated by Cottongrasses, Ling and bog mosses (*Sphagnum* spp.). On steeper slopes there is some flushing and here Purple Moor-grass, Heath Rush, and certain *Sphagnum* species become more common. The Liffey Head blanket bog is among the best of its kind in eastern Ireland, with deep peat formations and an extensive system of dystrophic pools developed among the hummocks and hollows on the bog surface. The vegetation is largely dominated by Ling and Cross-leaved Heath, with Cottongrasses (*Eriophorum vaginatum* and *E. angustifolium*), Deergrass (*Scirpus cespitosus*) and Bog Asphodel (*Narthecium ossifragum*). In drier areas, Bilberry and Cowberry (*Vaccinium vitis-idaea*) are common, while the scarce Bog Rosemary (*Andromeda polifolia*) is also found. Blanket bog occurs over extensive areas of deeper peat on the plateau and also on gentle slopes at high altitudes. Peat erosion is frequent on the peaks - this may be a natural process, but is likely to be accelerated by activities such as grazing.

Due to the underlying rock strata, the water of the rivers and streams tends towards acidity. The water is generally oligotrophic and free from enrichment. The lakes within the area range from the high altitude lakes of Lough Firrib and Three Lakes, to the lower pater-noster lakes of Glendalough, Lough Tay and Lough Dan. Spectacular corrie lakes (such as Loughs Bray (Upper and Lower), Ouler, Cleevaun, Arts, Kellys and Nahanagan) exhibit fine sequences of moraine stages. The deep lakes are characteristically species poor, but hold some interesting plants including an unusual form of Quillwort (*Isoetes lacustris* var. *morei*), a Stonewort (*Nitella* sp.) and Floating Bur-reed (*Sparganium angustifolium*). The Red Data Book fish species Arctic Char has been recorded from Lough Dan, but this population may now have died out.

Alpine vegetation occurs on some of the mountain tops, notably in the Lugnaquilla area, and also on exposed cliffs and scree slopes elsewhere in the site. Here alpine heath vegetation is represented with species such as Crowberry (*Empetrum nigrum*), Cowberry, Dwarf Willow (*Salix herbacea*), the grey-green moss *Racomitrium lanuginosum* and scarce species such as Mountain Clubmoss (*Diphasiastrum alpinum*), Firmoss (*Huperzia selago*), and Starry Saxifrage (*Saxifraga stellaris*). Some rare arctic-alpine species have been recorded, including Alpine Lady's-mantle (*Alchemilla alpina*) and Alpine Saw-wort (*Saussurea alpina*).

Small areas of old oakwood (Blechno-Quercetum petraeae type) occur on the slopes of Glendalough and Glenmalure, near L. Tay and L. Dan, with native Sessile Oak (*Quercus petraea*) 100-120 years old. On wetter areas, wet broadleaved semi-natural woodlands occur, which are dominated by Downy Birch (*Betula pubescens*). Mixed woodland with non-native tree species also occurs.

The site supports a range of rare plant species, which are listed in the Irish Red Data Book: Parsley Fern (*Cryptogramma crispa*), Marsh Clubmoss (*Lycopodiella inundata*), Greater Broom-rape (*Orobanche rapum-genistae*), Alpine Lady's-mantle, Alpine Saw-wort, Lanceolate Spleenwort (*Asplenium billotii*), Small White Orchid (*Pseudorchis albida*) and Bog Orchid (*Hammarbya paludosa*). The latter three species are legally protected under the Flora (Protection) Order, 1999. The rare Myxomycete fungus, *Echinostelium colliculosum*, has been recorded from the Military Road.

Mammals and birds which occur are typical of the uplands. Deer are abundant, mainly hybrids between Red and Sika Deer. Other mammals include Hare, Badger and Otter, the latter being a species listed on Annex II of the E.U. Habitats Directive. Pine Marten has recently been confirmed as occurring within the site. Among the birds, Meadow Pipit, Skylark, Raven and Red Grouse are resident throughout the site. Wheatear, Whinchat and the scarce Ring Ouzel are summer visitors. Wood Warbler and Redstarts are rare breeding species of the woodlands. Dipper and Grey Wagtail are typical riparian species. Merlin and Peregrine Falcon, both Annex I species of the EU Birds Directive, breed within the site. Recently, Goosander has become established as a breeding species.

Large areas of the site are owned by NPWS, and managed for nature conservation based on traditional landuses for the uplands. The most common landuse is traditional sheep grazing. Other land uses include turf-cutting, mostly hand-cutting but some machine-cutting occurs. These activities are largely confined to the Military Road, where there is easy access. Large areas which had been previously hand-cut and are now abandoned, are regenerating. In the last 40 years, forestry has become an important landuse in the uplands, and has affected both the wildlife and the hydrology of the area. Amenity use is very high, with Dublin city close to the site.

Wicklow Mountains is important as a complex, extensive upland site. It shows great diversity from a geomorphological and a topographical point of view. The vegetation provides examples of the typical upland habitats with heath, blanket bog and upland grassland covering large, relatively undisturbed areas. In all ten habitats listed on Annex I of the EU Habitats Directive are found within the site. Several rare, protected plant and animal species occur.

12.10.2001

SITE SYNOPSIS

SITE NAME: WICKLOW MOUNTAINS SPA

SITE CODE: 004040

This is an extensive upland site, comprising a substantial part of the Wicklow Mountains. The underlying geology of the site is mainly of Leinster granites, flanked by Ordovician schists, mudstones and volcanics. The area was subject to glaciation

and features fine examples of glacial lakes, deep valleys and moraines. Most of site is over 300 m, with much ground being over 600 m; the highest peak is Lugnaquilla (925 m). The substrate over much of site is peat, with poor mineral soil occurring on the slopes and lower ground. Exposed rock and scree are features of the site.

The dominant habitats present are blanket bog, heaths and upland grassland. The bog habitat is usually dominated by Ling (*Calluna vulgaris*), Cross-leaved Heath (*Erica tetralix*), Cottongrasses (*Eriophorum vaginatum* and *E. angustifolium*), Deergrass (*Scirpus cespitosus*) and Bog Asphodel (*Narthecium ossifragum*). Bog mosses (*Sphagnum* spp.) are well represented. On shallower peats, dry heath is represented by such species as Ling, Gorse (*Ulex* spp.), Bell Heather (*Erica cinerea*), Bilberry (*Vaccinium myrtillus*), Purple Moor-grass (*Molinia caerulea*) and lichens (*Cladonia* spp.). Fine examples of native Oak woodlands are found in the Glendalough area, and include Sessile Oak (*Quercus petraea*) trees of 100-120 years old. Glendalough Lake is a good example of an oligotrophic system.

The site supports good examples of both upland and woodland bird communities. The open peatlands provide excellent foraging habitat for Merlin (5-10 pairs) and Peregrine (c. 10 pairs). The Merlins nest in old crows nests, whilst the Peregrines nest on cliffs and crags. Other birds of the open peatlands and scree slopes include Ring Ouzel, now a very rare bird in Ireland, and Red Grouse. The Wicklow uplands are the only regular location in Ireland where Goosander breeds, with the Glendalough lakes being a regular site. This species was proved to be breeding only as recently as 1994 and it is now well established. Whinchat, a localised species in Ireland, breeds within the site.

The Glendalough Oak woods are a regular location for several rare breeding passerines. Redstart is recorded most years and 1-2 pairs probably breed. Wood Warbler is another annual visitor, with perhaps up to 5 pairs in some years. Recently, Garden Warbler has been recorded, whilst Blackcap has a very strong breeding population.

The site, which is within the Wicklow Mountains National Park, is fragmented into about twenty separate parcels of land. Much of the site is State-owned and managed for nature conservation based on traditional landuses for the uplands. The most common landuse is traditional sheep grazing. Other land uses include turf-cutting, mostly by hand though some machine-cutting also occurs. Grazing by sheep and deer in the woodlands can be damaging as it prevents or reduces regeneration. Dublin City is close to the site and amenity use is very high; if not properly controlled, recreational activities could cause disturbance to some bird species.

This site is of high ornithological importance as it supports very good examples of upland and woodland bird communities. Several of the species which occur are very rare at a national level. Two species, Ring Ouzel and Red Grouse, are Red-listed and their status is of high conservation concern. Also of note is that Merlin and Peregrine are both listed on Annex I of the E.U. Birds Directive.

25.8.2004

SITE SYNOPSIS

SITE NAME: SOUTH DUBLIN BAY AND RIVER TOLKA ESTUARY SPA

SITE CODE: 004024

The South Dublin Bay and River Tolka Estuary SPA comprises a substantial part of Dublin Bay. It includes the intertidal area between the River Liffey and Dun Laoghaire, and the estuary of the River Tolka to the north of the River Liffey, as well as Booterstown Marsh. A portion of the shallow marine waters of the bay is also included.

In the south bay, the intertidal flats extend for almost 3 km at their widest. The sediments are predominantly well-aerated sands. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. The landward boundary is now almost entirely artificially embanked. There is a bed of Dwarf Eelgrass (*Zostera noltii*) below Merrion Gates which is the largest stand on the east coast. Green algae (*Enteromorpha* spp. and *Ulva lactuca*) are distributed throughout the area at a low density. The macro-invertebrate fauna is well-developed, and is characterised by annelids such as Lugworm (*Arenicola marina*), *Nephtys* spp. and Sand Mason (*Lanice conchilega*), and bivalves, especially Cockle (*Cerastoderma edule*) and Baltic Tellin (*Macoma balthica*). The small gastropod Spire Shell (*Hydrobia ulvae*) occurs on the muddy sands off Merrion Gates, along with the crustacean *Corophium volutator*.

Sediments in the Tolka Estuary vary from soft thixotropic muds with a high organic content in the inner estuary to exposed, well-aerated sands off the Bull Wall. The site includes Booterstown Marsh, an enclosed area of saltmarsh and muds that is cut off from the sea by the Dublin/Wexford railway line, being linked only by a channel to the east, the Nutley stream. Sea water incursions into the marsh occur along this stream at high tide. An area of grassland at Poolbeg, north of Irishtown Nature Park, is also included in the site.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Light-bellied Brent Goose, Oystercatcher, Ringed Plover, Golden Plover, Grey Plover, Knot, Sanderling, Dunlin, Bar-tailed Godwit, Redshank, Black-headed Gull, Roseate Tern, Common Tern and Arctic Tern. The E.U. Birds Directive pays particular attention to wetlands, and as these form part of the SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

The site is an important site for wintering waterfowl, being an integral part of the internationally important Dublin Bay complex – all counts for wintering waterbirds are mean peaks for the five year period 1995/96-99/2000. Although birds regularly commute between the south bay and the north bay, recent studies have shown that certain populations which occur in the south bay spend most of their time there. An internationally important population of Light-bellied Brent Goose (525) occurs regularly and newly arrived birds in the autumn feed on the Eelgrass bed at Merrion. Light-bellied Brent Goose is also known to feed on the grassland at Poolbeg.

The site

supports nationally important numbers of a further nine species: Oystercatcher (1,263), Ringed Plover (161), Golden Plover (1,452), Grey Plover (183), Knot (1,151), Sanderling (349), Dunlin (2,753), Bar-tailed Godwit (866) and Redshank (713). Other species occurring in smaller numbers include Great Crested Grebe (21), Curlew (397) and Turnstone (75).

South Dublin Bay is a significant site for wintering gulls, especially Black-headed Gull (3,040), but also Common Gull (330) and Herring Gull (348). Mediterranean Gull is also recorded from here, occurring through much of the year, but especially in late winter/spring and again in late summer into winter.

Both Common Tern and Arctic Tern breed in Dublin Docks, on a man-made mooring structure known as the E.S.B. dolphin – this is included within the site. Small numbers of Common Tern and Arctic Tern were recorded nesting on this dolphin in the 1980s. A survey of the dolphin in 1999 recorded Common Tern nesting here in nationally important numbers (194 pairs). This increase was largely due to the ongoing management of the site for breeding terns. More recent data highlights this site as one of the most important Common Tern sites in the country with over 400 pairs recorded here in 2007.

The south bay is an important tern roost in the autumn (mostly late July to September). Birds also use the Dalkey Islands to the south. The origin of many of the birds is likely to be the Dublin breeding sites (Rockabill and the Dublin Docks) though numbers suggest that the site is also used by birds from other sites, perhaps outside the state. More than 10,000 terns have been recorded, consisting of Common, Arctic and Roseate terns.

The wintering birds within this site are now well-monitored. More survey, however, is required on the wintering gulls and the autumn terns.

Boosterstown Marsh supports an important population of Borrer's Saltmarsh-grass (*Puccinellia fasciculata*), a rare, Red Data Book species that is listed on the Flora (Protection) Order, 1999.

The South Dublin Bay and River Tolka Estuary SPA is of international importance for Light-bellied Brent Goose and of national importance for nine other waterfowl species. As an autumn tern roost, it is also of international importance. Furthermore, the site supports a nationally important colony of Common Tern. All of the tern species using the site are listed on Annex I of the E.U. Birds Directive, as are Bartailed Godwit and Mediterranean Gull.

1.5.2008

Appendix 2

Identification of Natura 2000 Sites and their Relevance to the Proposed Project Site

Site Name and Code	Distance from Proposed Plan	Natura 2000 Features of Interest	Do any potential source-pathway-receptor links exist between the proposed development and the Natura 2000 site?
Glenasmole Valley SAC (001209)	10 km	<p>*Petrifying springs with tufa formation</p> <p>Semi-natural dry grassland and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)</p> <p><i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p>	No. The Glenasmole Valley SAC is located in the Dublin Mountains which is situated at an altitude higher than that of the proposed Project site lands and in a separate river catchment area which does not drain through the proposed Project lands. There are therefore no hydrological links connecting the Natura 2000 site to the lands of the proposed Project site. In addition, there are no direct ecological pathways linking the two areas.
Wicklow Mountains SAC (002122)	13 km	<p>Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea</p> <p>Natural dystrophic lakes and ponds</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>European dry heaths; Alpine and Boreal heaths</p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)</p> <p>Blanket bog</p>	No. The Wicklow Mountains SAC is located in the Dublin Mountains which is situated at an altitude higher than that of the proposed Project lands and in a separate river catchment area which does not drain through the proposed Project lands. There are therefore no hydrological links connecting the Natura 2000 site to the lands of the proposed Project site. In addition, there are no direct ecological pathways linking the two areas.

<p>Wicklow Mountains SPA (004040)</p>	<p>13 km</p>	<p>Merlin (<i>Falco columbarius</i>) Peregrine (<i>Falco peregrinus</i>)</p>	<p>No. The Wicklow Mountains SPA is located in the Dublin Mountains which is situated at an altitude higher than that of the proposed Project lands and in a separate river catchment area which does not drain through the proposed Project lands. There are therefore no hydrological links connecting the Natura 2000 site to the lands of the proposed Project site. In addition, there are no direct ecological pathways linking the two areas.</p>
<p>South Dublin Bay and River Tolka Estuary SPA (004024)</p>	<p>>13 km</p>	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) Oystercatcher (<i>Haematopus ostralegus</i>) Ringed Plover (<i>Charadrius hiaticula</i>) Golden Plover (<i>Pluvialis apricaria</i>) Knot (<i>Calidris canutus</i>) Sanderling (<i>Calidris alba</i>) Dunlin (<i>Calidris alpina</i>) Bar-tailed Godwit (<i>Limosa lapponica</i>) Redshank (<i>Tringa totanus</i>) Black-headed Gull (<i>Larus ridibundus</i>) Roseate Tern (<i>Sterna dougallii</i>) Common Tern (<i>Sterna hirundo</i>) Arctic Tern (<i>Sterna paradisaea</i>) Wetlands & Waterbirds</p>	<p>There are no direct hydrological or relevant ecological links connecting the proposed project lands to this Dublin Bay Natura 2000 site. The overarching policies and objectives outlined in the South Dublin County Development Plan 2016-2022 in relation to water supply, ground water and surface water quality, waste water treatment, and capacity of Ringsend Waste Water treatment plant, will together ensure no significant impact arises from the project site or the wider lands within which it is located.</p>