

# Appropriate Assessment Screening for the Proposed Development of a Sports Campus at St. Thomas House, Tibradden Road, Dublin 16.



11th July 2024

**Prepared by:** Bryan Deegan (MCIEEM) of Altemar Ltd. **On behalf of:** Dún Laoghaire Rathdown County Council

		<b>Document Control Sheet</b>				
Project	Appropriate Assessme	ent Screening for a proposed o	development of a sports campus at St			
	Thomas House, Tibrac	Thomas House, Tibradden Road, Dublin 16.				
Report	Appropriate Assessmo	ent Screening				
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Planning	Bryan Deegan 11 <sup>th</sup> July 2024					

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## Introduction

An Appropriate Assessment is an assessment of the potential effects of a proposed project or plan, on its own, or in combination with other plans or projects, on one or more European sites (Special Areas of Conservation (SAC) or Special Protection Areas (SPA)).

The following Appropriate Assessment (AA) (Screening Stage) has been prepared by **Alternar Ltd.** at the request of Dún Laoghaire Rathdown County Council. The project relates to a proposed development of a sports campus at St. Thomas House, Tibradden Road, Dublin 16.

The AA Screening stage examines the likely significant effects of the proposed development, either on its own, or in combination with other plans and projects, upon a European site and considers whether, on the basis of objective scientific evidence, it can be concluded, in view of best scientific knowledge and the conservation objectives of the relevant European sites, that there are not likely to be significant effects on any European site.

#### Altemar Ltd.

Since its inception in 2001, Altemar has been delivering ecological and environmental services to a broad range of clients. Operational areas include residential, infrastructural, renewable, oil & gas, private industry, local authorities, EC projects and State/semi-State Departments. Bryan Deegan is the managing director of Altemar. Bryan is an environmental scientist and marine biologist with 30 years' experience working in Irish terrestrial and aquatic environments, providing services to the State, Semi-State and industry. Bryan Deegan (MCIEEM) holds a MSc in Environmental Science, BSc (Hons.) in Applied Marine Biology, NCEA National Diploma in Applied Aquatic Science and a NCEA National Certificate in Science (Aquaculture). Bryan Deegan carried out all elements of this Appropriate Assessment Screening.

## Background to the Appropriate Assessment

The Habitats Directive 92/43/EEC (together with the Birds Directive (2009/1477/EC)) forms the cornerstone of Europe's nature conservation policy. The Directive protects over 1000 animals and plant species and over 200 "habitat types" which are of European importance. In the Habitats Directive, Articles 3 to 9 provide the legislative means to protect habitats and species of European Community interest through the establishment and conservation of an EU-wide network of conservation sites (NATURA, 2000). These are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive), Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment:

"Any plan or project not directly connected with or necessary to the management of the [EUROPEAN] site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the component 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."

As outlined in "Managing European sites, The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" (European Commission, 21 November 2018) "The purpose of the appropriate assessment is to assess the implications of the plan or project in respect of the site's conservation objectives, either individually or in combination with other plans or projects. The conclusions should enable the competent authorities to ascertain whether the plan or project will adversely affect the integrity of the site concerned. The focus of the appropriate assessment is therefore specifically on the species and/or the habitats for which the European site is designated."

As outlined in the EC guidance document on Article 6(4) (January 2007)1:

"Appropriate assessments of the implications of the plan or project for the site concerned must precede its approval and take into account the cumulative effects which result from the combination of that plan or project with other plans or projects in view of the site's conservation objectives. This implies that all aspects of the plan or project which can, either individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.

Assessment procedures of plans or projects likely to affect European sites should guarantee full consideration of all elements contributing to the site integrity and to the overall coherence of the network, both in the definition of the baseline conditions and in the stages leading to identification of potential impacts, mitigation measures and residual impacts. These determine what has to be compensated, both in quality and quantity. Regardless of whether the provisions of Article 6(3) are delivered following existing environmental impact assessment procedures or other specific methods, it must be ensured that:

- Article 6(3) assessment results allow full traceability of the decisions eventually made, including the selection of alternatives and any imperative reasons of overriding public interest.
- The assessment should include all elements contributing to the site's integrity and to the
  overall coherence of the network as defined in the site's conservation objectives and Standard
  Data Form, and be based on best available scientific knowledge in the field. The information
  required should be updated and could include the following issues:
  - Structure and function, and the respective role of the site's ecological assets;
  - Area, representativity and conservation status of the priority and nonpriority habitats in the site;
  - Population size, degree of isolation, ecotype, genetic pool, age class structure, and conservation status of species under Annex II of the Habitats Directive or Annex I of the Birds Directive present in the site;
  - Role of the site within the biographical region and in the coherence of the European network; and,
  - o Any other ecological assets and functions identified in the site.
- It should include a comprehensive identification of all the potential impacts of the plan or
  project likely to be significant on the site, taking into account cumulative impacts and other
  impacts likely to arise as a result of the combined action of the plan or project under
  assessment and other plans or projects.
- The assessment under Article 6(3) applies the best available techniques and methods, to estimate the extent of the effects of the plan or project on the biological integrity of the site(s) likely to be damaged.
- The assessment provides for the incorporation of the most effective mitigation measures into the plan or project concerned, in order to avoid, reduce or even cancel the negative impacts on the site.
- The characterisation of the biological integrity and the impact assessment should be based on the best possible indicators specific to the European assets which must also be useful to monitor the plan or project implementation."

<sup>&</sup>lt;sup>1</sup> European Commission. (2007).Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission;

# Stages of the Appropriate Assessment

This Appropriate Assessment screening was undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2001), Part XAB of the Planning and Development Act 2000, as amended, in addition to the December 2009 publication from the Department of Environment, Heritage and Local Government; 'Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities' and the European Communities (Birds and Natural Habitats) Regulations 2011. In order to comply with the above Guidelines and legislation, the Appropriate Assessment process must be structured as follows:

#### 1) Screening stage:

- Description of plan or project, and local site or plan area characteristics;
- Identification of relevant European sites, and compilation of information on their qualifying interests and conservation objectives
- Identification and description of individual in combination effects likely to result from the proposed project;
- Assessment of the likely significance of the effects identified above. Exclusion of sites where it can be objectively concluded that there will be no likely significant effects; and,
   Conclusions

#### 2) Appropriate Assessment (Natura Impact Statement):

- Description of the European sites that will be considered further;
- Identification and description of potential adverse impacts on the conservation objectives of these sites likely to occur from the project or plan; and,
- Mitigation Measures that will be implemented to avoid, reduce or remedy any such potential adverse impacts
- Assessment as to whether, following the implementation of the proposed mitigation measures, it
  can be concluded, beyond all reasonable scientific doubt, that there will be no adverse impact on
  the integrity of the relevant European Site in light of its conservation objectives"
- Conclusions.

If it can be demonstrated during the AA screening phase (Stage 1), that the proposed project will not have a significant effect, whether alone or in combination with other plans or projects, on the conservation objectives of a European site, then no further AA (Stage 2) will be required. It is important to note that there is a requirement to apply a precautionary approach to AA screening. Therefore, where effects are possible, certain or unknown at the screening stage, AA will be required.

In addition, it should be noted that Article 6(3) of the Habitats Directive must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an AA of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.

# Stage 1 Screening Assessment

### Management of the Site

The project is not directly connected with, or necessary to, the management of European sites.

#### **Project Description**

Dun Laoghaire Rathdown County Council (DLR) in collaboration with Dundrum South Dublin Athletics (DSD) is proposing to develop a Sports Campus in the grounds of St Thomas House, Tibradden Road, Co. Dublin as a satellite amenity to Marlay Park. The proposed development comprises Phase Two of a development plan, Phase One having been completed early in 2023. The site for the proposed development is located off Tibradden Road, Rathfarnam, Dublin 16. The phase 2 developed design comprises (1) a single storey activities and administration building of c.1,574m² with 4.5m floor to ceiling clearance generally, (2) a single storey sprint track enclosure of c.841m² with 3.5m rising to 5.0m floor to ceiling clearance and (3) site landscaping to settle the building into its immediate context and to tie in with existing facilities delivered in phase 1. The site outlined in red on the site location map is approximately 1.3 hectares. In the Marlay Park Master Plan adopted in January 2019 the area known as the Sports Paddocks and the North West Field will be developed to provide enhanced sports facilities for public use. As both of these areas are at the western end of Marlay Park, the location of the multi-sport campus at St Thomas Fields, a half kilometre westward, may be considered an extension to and enhancement of these public sports facilities. With a recently upgraded footpath and cycleway connection and good road access, these three areas: the North West Field, the Sports Paddocks, and the St Thomas Fields multi-sport campus may be seen as one comprehensive sporting facility for the benefit of the public.

The site outline, site location and architectural drawings are shown in Figures 1-6.

#### Landscape

The landscape strategy for the proposed project has been prepared by Dún Laoghaire Rathdown County Council. The landscape plans are demonstrated in Figures 7 - 9. Alternar provided input in to the landscape plan to provide biodiversity enhancement features on site.

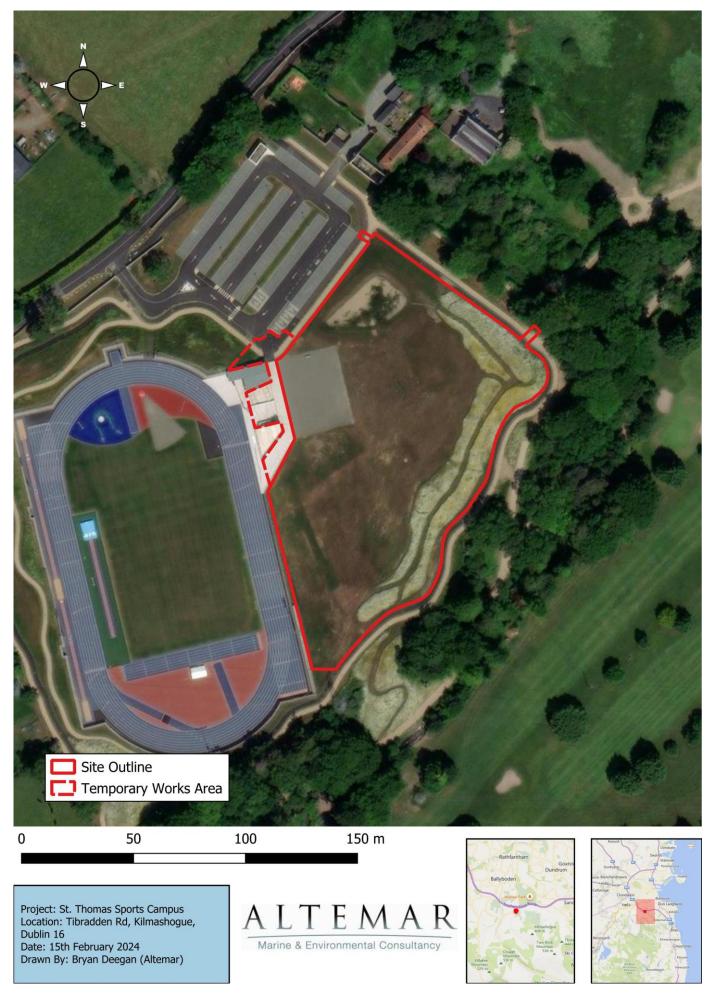


Figure 1. Site Outline

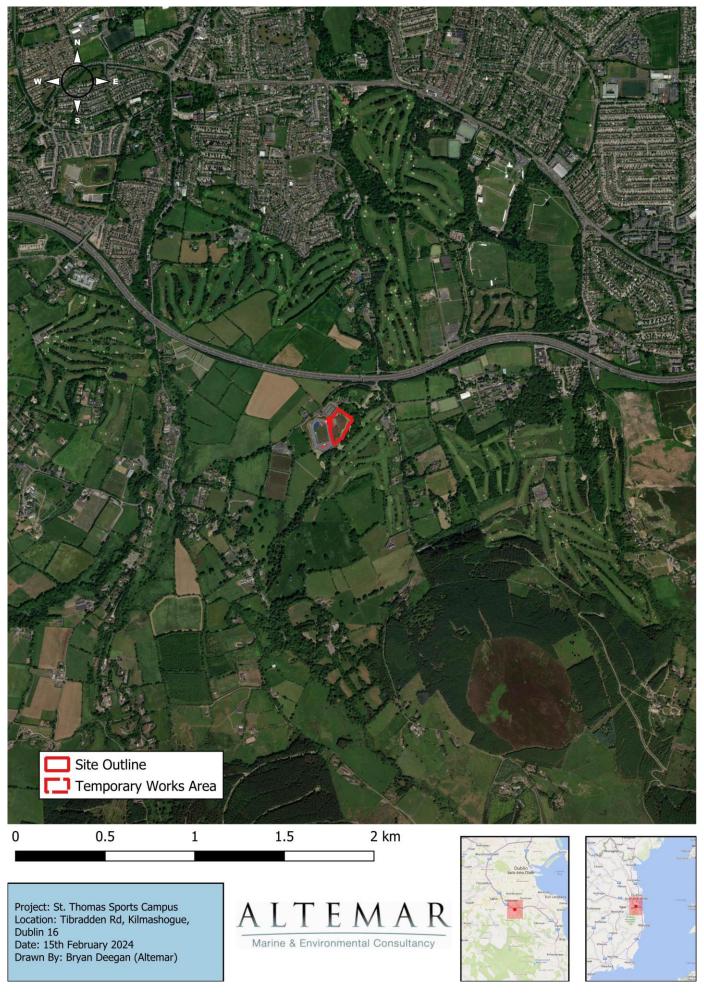
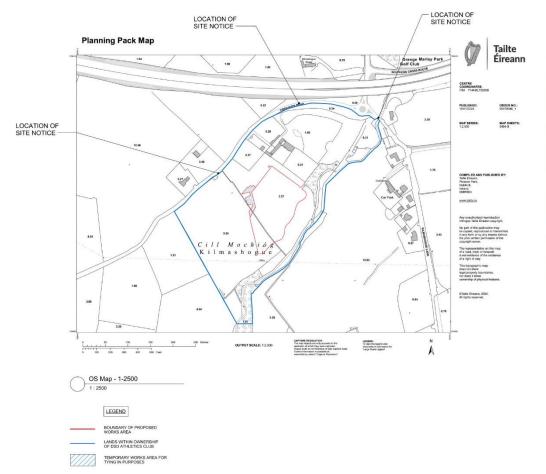


Figure 2. Site location



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SITE AERIAL IMAGE

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Project	St Thor	St Thomas Fields			
Drawing title:	OS Ma	P			
Job no:	23008				
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Date created	09/11/2	023		Revision	
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Part 8 Submission



Figure 3. Site location OS Map

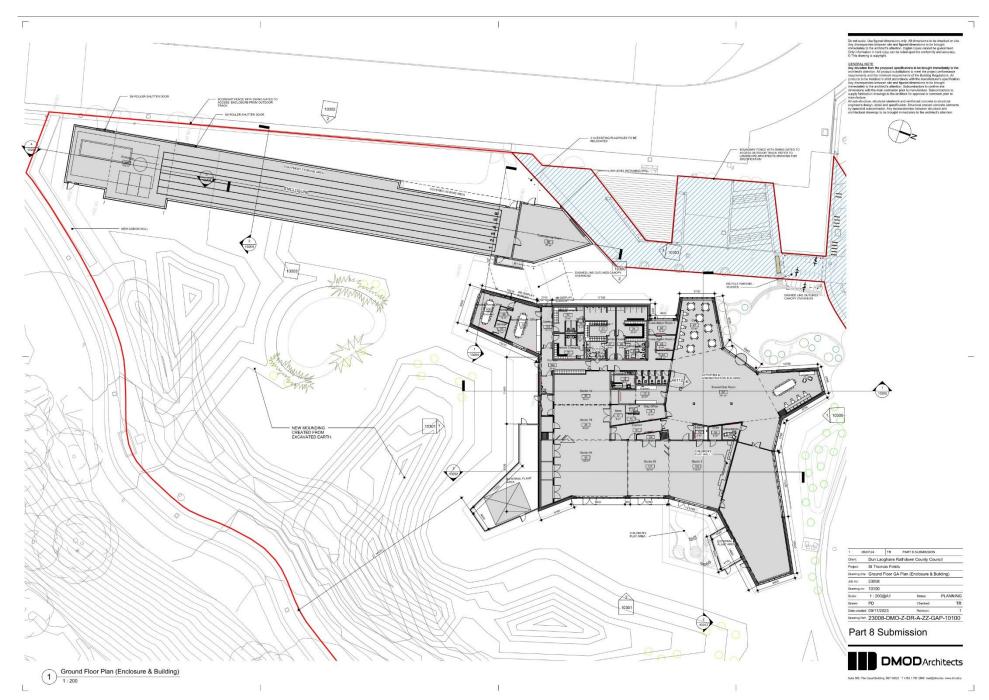
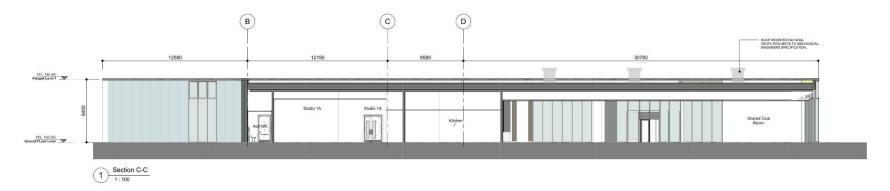


Figure 4. Ground floor plan

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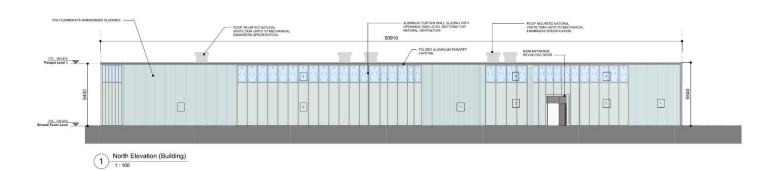




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Client:	Dun Laogha	ire Rathdown	County Cour	ncil
Project	St Thomas	Fields		
Drawing title:	Building GA	Section C-C 8	D-D	
Job no:	23008			
Drawing no:	10203			
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Date created	09/11/2023		Revision:	
Drawing Ref.	23008-0	MO-Z-DR-	A-77-SE	C-10203

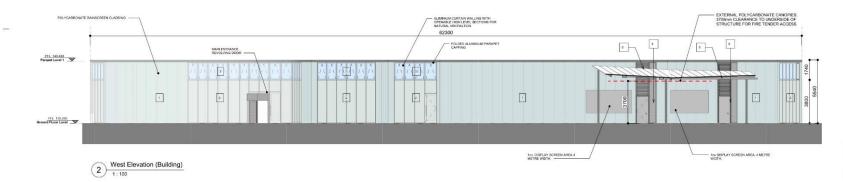
#### Part 8 Submission







- Polycarbonate Cladding (900mm wide)
   Aluminium Frame Curtain Wall Glazing
   Fritted Glass Opening Panel
   Spander Infill Panel
   Ventitation Louves
   Polycarbonate Cladding (600mm wide)
   Low Energy Concrete Wall





#### MAP KEY

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Client	Dun La	oghaire	Rathdown County Co	uncil		
Project	St Tho	nas Fiel	ds			
Drawing title:	Elevation North & West (Building)					
Job no:	23008					
Drawing no:	10300					
Scale:	1:100	@A1	Status:	PLANNING		
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Date created	09/11/2	023	Revision:	1		
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#### Part 8 Submission





**Figure 7.** Ecological enhancement measures



Figure 8. Landscape plan – site layout



Figure 9. Landscape plan

#### Drainage

An Engineering Services Report has been prepared by O'Connor Sutton Cronin to accompany this planning application. It outlines the following drainage strategy for the proposed development:

#### **'EXISTING SURFACE WATER DRAINAGE**

#### EXISTING SURFACE WATER INFRASTRUCTURE

We are aware that there is existing surface water infrastructure on the site which was intended to be designed to cover the site master plan however, from our discussions with our colleagues in DLRDCC we understand that the volume of attenuation provided as part of the Phase 1 works is not sufficient to deal with the volume of surface water expected nor does it satisfy their requirements. We also understand that in line with this there are compliance issues to be closed out as part of the Phase 1 works. These will need to be closed out by the Phase 1 team which OCSC nor the current Phase 2 Design team were party to.

#### PROPOSED SURFACE WATER DESIGN STRATEGY

#### **OVERVIEW**

In light of the above issue that there is not sufficient attenuation provided in Phase 1 for the Phase 1 site excluding the Phase 2 proposals we are proposing to DLRDCC that we, as part of the Phase 2 works, cater for all our own surface water within Phase 2 alone. Thereby taking no benefit from the works already built on the site and treating our Phase 2 site as completely separate. This means that we are proposing to cater for the surface water attenuation in two distinct ways as part of the Phase 2 works. It is our proposal to cater for the surface water attenuation on the Phase 2 site via utilising a blue roof system under our extensive green roof system on the roof of the Facility Building and also to cater for surface water at ground level create an additional detention pond within the Phase 2 site for attenuation at ground level. By utilising both of these systems we can cater for all surface water generated within Phase 2 in Phase 2 alone and neglect any benefit from the Phase 1 constructed works.

#### CLIMATE CHANGE ALLOWANCE

The proposed surface water network according to the current DLRDCC Development plan requires all surface water design to cater for a 20% increase in intensity. We can confirm that we have catered for this allowance within the Phase 2 attenuation calculation. A copy of the results of the calculations are included in the Appendices.

#### SURFACE WATER MANAGEMENT PLAN

The proposed surface water management plan has been delivered for this site as part of the phase one works. However as noted previously we are now proposing an entirely new surface water system to cater for the Phase 2 works alone.

#### PROPOSED PIPE NETWORK DESIGN

All external, in-ground pipe infrastructure has been designed in accordance with BS EN 752 and all new infrastructure is to be compliant with the requirements of the GDSDS and the GDRCOP for Drainage Works, with minimum full-bore velocities of 1.0 m/s achieved throughout.

All external main surface water carrier pipes have been sized to ensure no surcharging of the proposed drainage network for rainfall events up to, and including, the 1 in 5-year ARI event.

#### 3.4.2 SURFACE WATER OUTFALL LOCATION

The surface water outfall location for this development has been constructed as part of the Phase 1 works and discharges to the local stream. We are planning to reuse this connection as part of the Phase 2 works.

## 3.4.3 ATTENUATION STORAGE

A total volume of (256 +106m³) = 362m³ of attenuation of attenuation has been provided as part of the Phase 2 works to cater for the sports facility and associated hard standings constructed as part of Phase 2. We have designed the blue roof attenuation system on the proposed facility building as its own region with site are taken as roof area and attenuation volume calculated on that basis alone which is the worst case for the blue roof system. We have shown this connecting into the main surface line on the site which is then further

attenuated, we have two options here either we adjust the outflow from this hydrobreak or we connect the roof storage to the final surface water line after the flow control device manhole. We can discuss this in more detail should there be an issue with either of these approaches.

#### 3.4.4 MAINTENANCE

The SuDS across the site are to be regularly inspected and maintained by the to-be-appointed development maintenance contractor, with appropriate management plan in place. We do recommend that the new proposed detention basin is fenced off due to the depth of proposed water.

# WASTEWATER DRAINAGE INFRASTRUCTURE

#### **4.1 CONSULTATION**

A Pre-Connection Enquiry form has been submitted to Irish Water for the proposed development by the team undertaking the design for Phase 1. The response to this connection offer consisted only of watermains connection which will be discussed later in this document as there is no public wastewater infrastructure in the vicinity.

#### **4.2 DESIGN GUIDELINES**

The wastewater network that is to serve the proposed development has been designed in accordance with Irish Water's Code of Practice for Wastewater Infrastructure and the Building Regulations, Part H.

#### 4.3 SITE CHARACTERISTIC REPORT - WASTEWATER DRAINAGE

As part of the phase 1 works Specialist Consultants licensed by the EPA, Trinity Green, specifically Dr Eugene Bolton undertook a design and assessment of the site at Tibradden Road. The testing and assessment of the site undertaken by Trinity Green for foul drainage was based on a development for a recreation facility that will accommodate up to **200 participants**. Trinity Green advised that based on EPA guidelines outlined in the EPA wastewater Manual for Small Systems Communities, Business, Leisure Centres and Hotels treating the development as a football club. The Hydraulic Loading equates to a hydraulic population equivalent of 40 and the organic loading equates to an organic population equivalent of 67. Thus, the treatment system needs to be sized for a population equivalent of 67.

Based on the calculations within the Trinity Green report from the site testing the soakage on the site was deemed to be acceptable. Based on the results from the Trinity Greens calculations it was recommended to install a package Aeration system and to polish the effluent through a sand filter and a discharge to ground. The area of the sand filter was advised to be  $175m^2$ . The proposed area of the infiltration pad was advised to be  $600m^2$ .

Finally it was noted to construct the infiltration pad and sand filter the area is stripped of vegetation removing not more than 200mm of topsoil and the gravel based in put in place to a depth of 300mm. The 175m² sand filter is then constructed directly on top of the gravel base. The polished effluent percolates by gravity from the sand filter into the gravel.

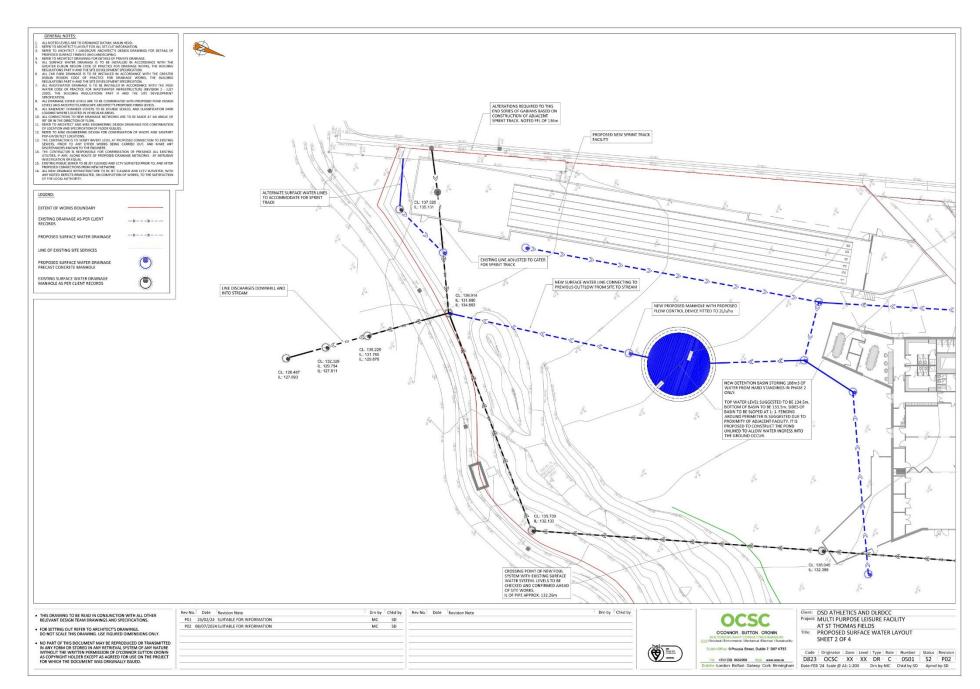
Following our discussions with Dr Eugene Bolton we believe the proposed design undertaken in 2019 is compliant with the revised EPA requirements for Design of systems such as this. We have also followed his advice as illustrated on our packages in relation to required offsets from Dwellings and Streams for placing the proposed Wastewater treatment system. A copy of the site characteristic assessment undertaken by Trinity Green is available in the attached Appendices.

The proposed OCSC design can be seen attached in the Appendices- this design incorporates the proposed wastewater treatment system advised by the client and Phase 1 team and undertaken by Dr Eugene Bolton of Trinity Green who are licensed by the EPA and whose design package was issued to the Phase 2 Team as part of the Phase 2 briefing.'

The foul and surface water drainage plans are shown in Figures 10-17.



**Figure 10.** Proposed surface water layout sheet 1



**Figure 11.** Proposed surface water layout sheet 2

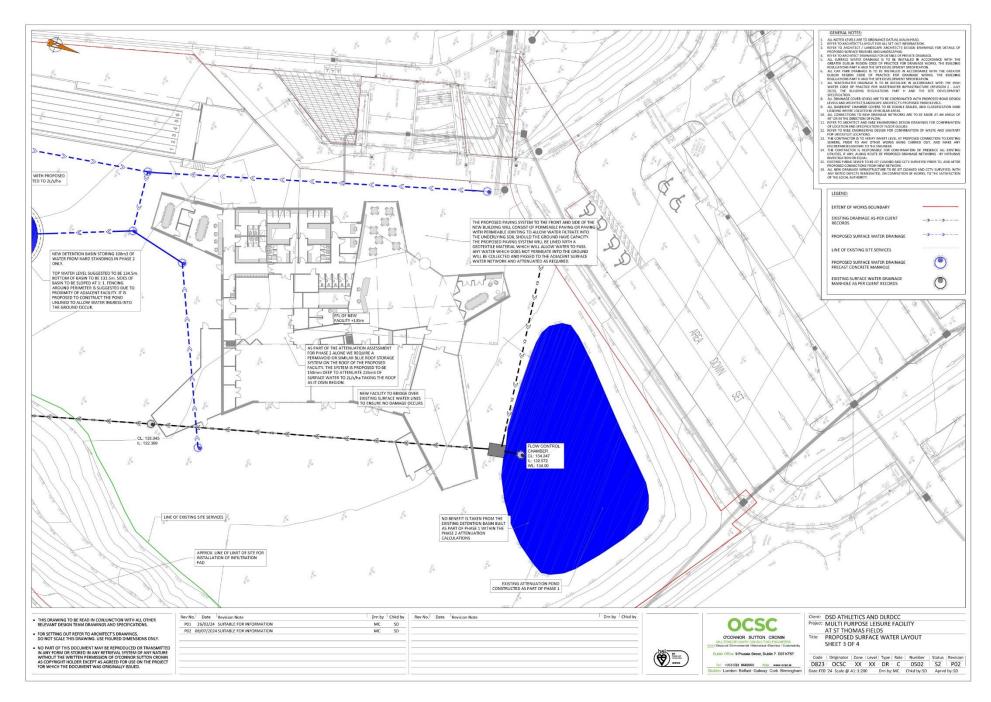


Figure 12. Proposed surface water layout sheet 3

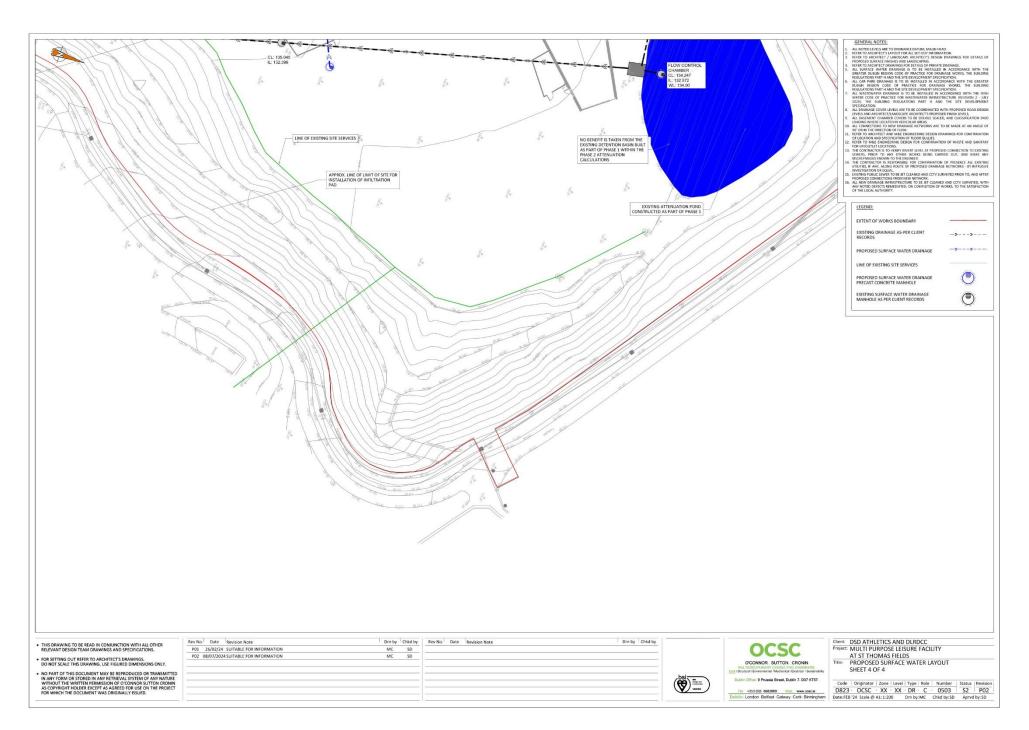
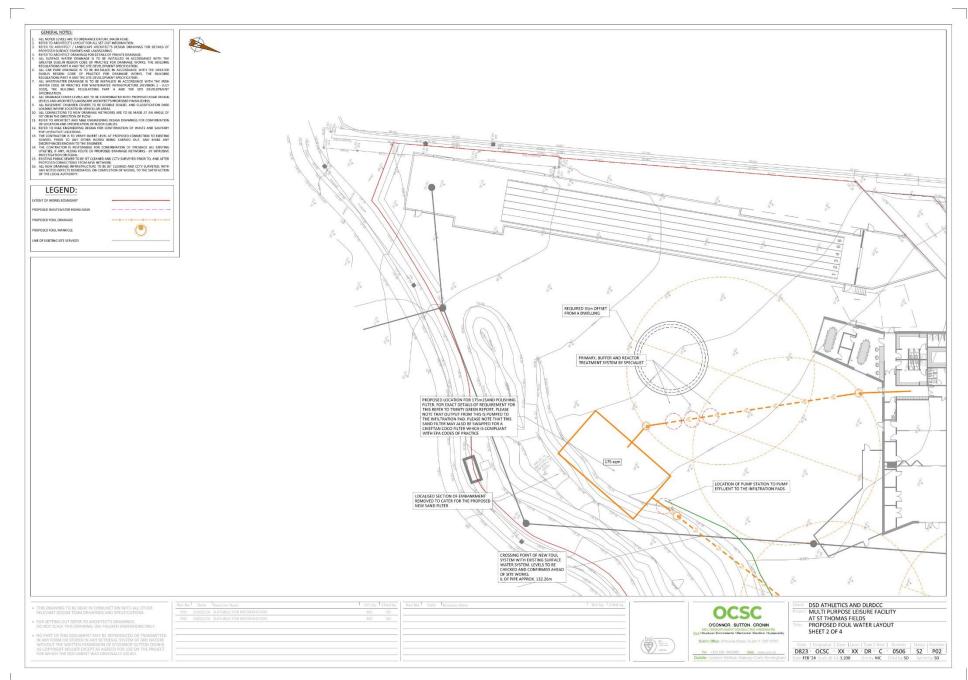


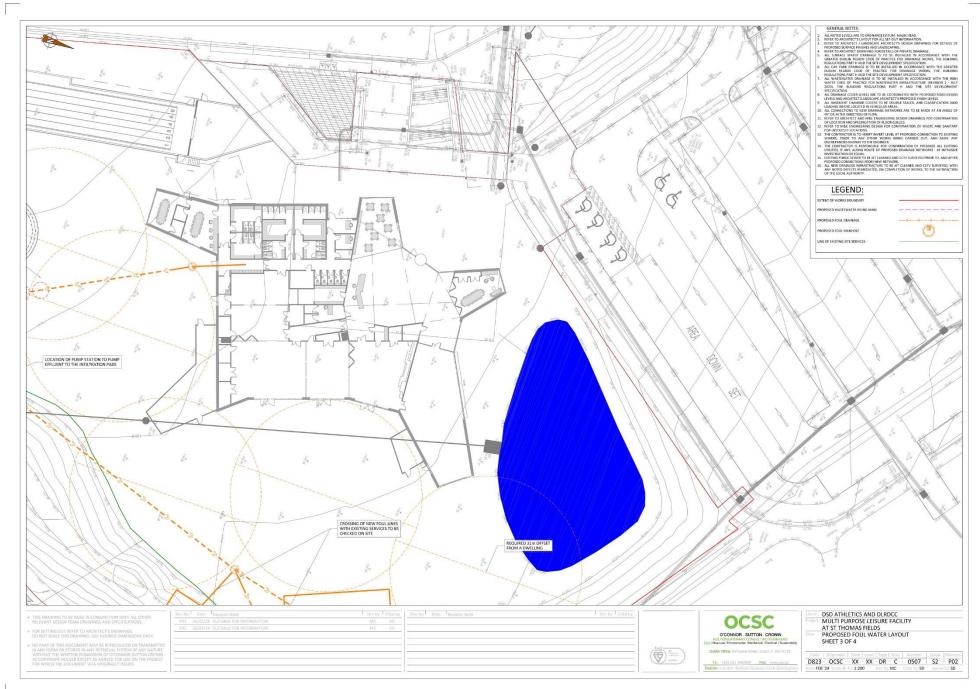
Figure 13. Proposed surface water layout sheet 4



**Figure 14.** Proposed foul water layout sheet 1



**Figure 15.** Proposed foul water layout sheet 2



**Figure 16.** Proposed foul water layout sheet 3

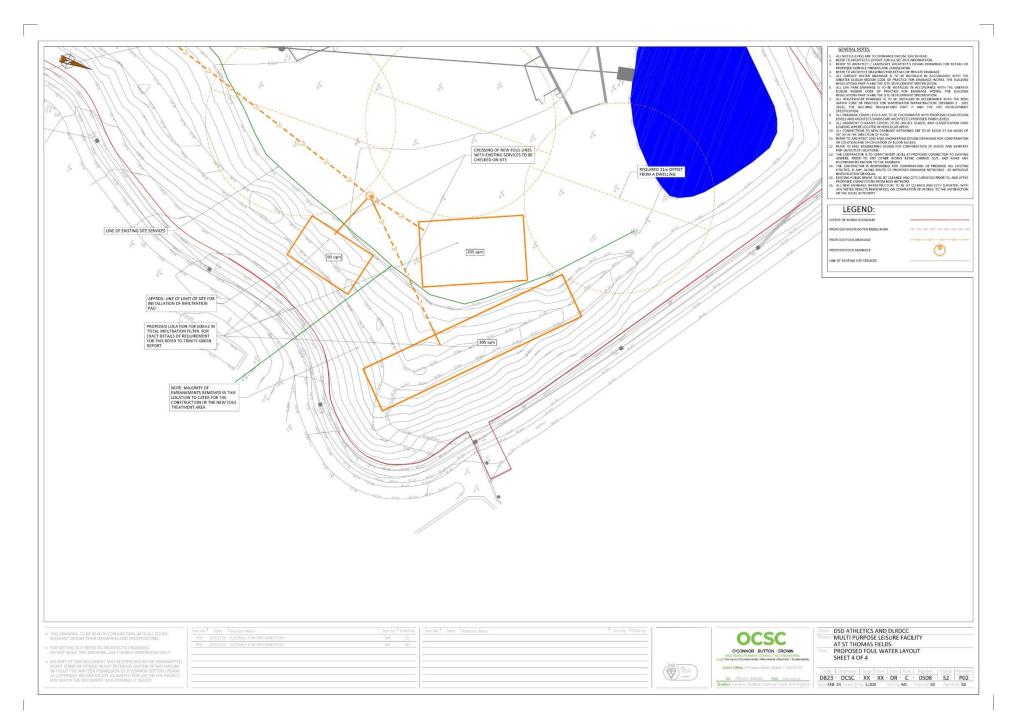


Figure 17. Proposed foul water layout sheet 4

# Identification of Relevant European Sites

The proposed development site is not within a European site. As outlined in Office of the Planning Regulator (2021) "The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source- Pathway-Receptor framework and not by arbitrary distances (such as 15 km)."

A key factor in the consideration as to whether a particular European site is likely to be affected by the proposed development is its distance from the development location. It is generally, but not necessarily, the case that the greater the distance from the plan or project the smaller the likelihood of impacts. In this case, the nearest Natura 2000 sites to the proposed development site are the Wicklow Mountains SAC (2.8km) and the Wicklow Mountains SPA (3.1km) (Figures 18 & 19). There is no hydrological connection to either of these sites from the proposed development site. The Whitechurch Stream flows approximately 30m from of the south-eastern boundary of the site (Figure 20) and joins the River Dodder approximately 4km North of the subject site.

Post on-site attenuation, it is proposed to discharge surface water to The Whitechurch Stream via existing infrastructure. This stream flows to the River Dodder ultimately outfalls to Dublin Bay approximately 9.5km North of the subject site. There are five Natura 2000 sites at Dublin Bay, namely South Dublin Bay SAC (7.7km), North Dublin Bay SAC (12.5km), South Dublin Bay and River Tolka Estuary SPA (7.6km), North Bull Island SPA (12.5km) and North-West Irish Sea SPA (12.6km). It is therefore considered that there is a weak indirect hydrological connection to these Natura 2000 sites. However, given the minimum distance to each site, and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. No significant effects on European sites are foreseen via surface water drainage.

It is proposed to install a wastewater treatment system on site as there is no public wastewater infrastructure in the vicinity of the site. This system involves the installation of a package aeration system and to polish the effluent through a sand filter and discharge to ground.

The ZoI of the proposed project would be seen to be restricted to the site outline and the adjacent riparian corridor, with potential for minor localised noise and lighting impacts during construction which could extend beyond the site outline into the adjacent woodland and watercourse.

Despite a lack of direct hydrological connection to European Sites, but in the interest of carrying out a thorough assessment in line with both the Habitats Directive, and the precautionary principle, the area of assessment was expanded beyond the ZoI to include designated sites within 15km of the proposed development site, and sites beyond 15km with the potential for a hydrological connection. This was done in the interest of ensuring that any pathways, however indirect or remote, were considered. All European sites within 15km are listed in Table 1. The qualifying interests, and the potential impact of the proposed development on each European site and qualifying interest, are screened out in Table 2. No potential impacts are foreseen on European sites beyond 15km as there is no direct or indirect pathways to these sites.

SACs and SPAs within 15km of the works site are demonstrated in Figures 18 and 19. Waterbodies and European sites located proximate to the proposed development are demonstrated in Figures 20 - 22.

Table 1. Natura 2000 sites within 15km of the proposed development site

Natura 2000 Site	Code	Distance	Direct Hydrological / Biodiversity Connection
Special Areas of Conservation			
Wicklow Mountains SAC	IE002122	2.8 km	No
Glenasmole Valley SAC	IE001209	5.6 km	No
Knocksink Wood SAC	IE000725	7.4 km	No
South Dublin Bay SAC	IE000210	7.7 km	No
Ballyman Glen SAC	IE000713	9.9 km	No
North Dublin Bay SAC	IE000206	12.5 km	No
Rockabill to Dalkey Island SAC	IE003000	12.8 km	No
Bray Head SAC	IE000714	15 km	No
Special Protection Areas			
Wicklow Mountains SPA	IE004040	3.1 km	No
South Dublin Bay and River Tolka Estuary SPA	IE004024	7.6 km	No
North Bull Island SPA	IE004006	12.5 km	No
North-West Irish Sea SPA	IE004236	12.6 km	No
Dalkey Islands SPA	IE004172	12.8 km	No

Table 2. Initial screening of European sites within 15km and European sites beyond 15km with potential of hydrological connection to the proposed development

Name	Screened	Details/Reason
	IN/OUT	
of Conservati	ion	
of Conservati Wicklow Mountains SAC		Conservation Objectives  The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.  Qualifying Interests Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with Erica tetralix [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Calaminarian grasslands of the Violetalia calaminariae [6130] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Lutra lutra (Otter) [1355]
•	of Conservat Wicklow Mountains	of Conservation Wicklow OUT Mountains

European Site Code	Name	Screened IN/OUT	Details/Reason
orte educ			Potential Impacts
			The proposed development site is located approximately 2.8km from this SAC. There is no direct or indirect hydrological pathway between the proposed development site and this SAC.  No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
IE001209	Glenasmole Valley SAC	ОИТ	Conservation Objectives  The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.  Qualifying Interests  Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]  Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]  Petrifying springs with tufa formation (Cratoneurion) [7220]
			Potential Impacts  The proposed development site is located approximately 5.6km from this SAC. There is no direct or indirect hydrological pathway between the proposed development site and this SAC.  No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
IE000725	Knocksink Wood SAC	OUT	Conservation Objectives  The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Petrifying springs with tufa formation (Cratoneurion) [7220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]
			Potential Impacts
			The proposed development site is located approximately 7.4km from this SAC. There is no direct or indirect hydrological pathway between the proposed development site and this SAC.
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.

European Site Code	Name	Screened IN/OUT	Details/Reason
IE000210	South Dublin Bay SAC	OUT	Conservation Objectives  The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests  Mudflats and sandflats not covered by seawater at low tide [1140]  Annual vegetation of drift lines [1210]  Salicornia and other annuals colonising mud and sand [1310]  Embryonic shifting dunes [2110]
			Potential Impacts
			The proposed development site is located approximately 7.7km from this SAC. There is no direct hydrological pathway between the proposed development site and this SAC.
			There is a weak indirect hydrological pathway from the proposed development site to this SAC via surface water drainage. Post onsite attenuation, it is proposed to discharge surface water to the Whitechurch Stream which flows 30m from the south-eastern boundary of the site. This stream joins the River Dodder which ultimately outfalls to Dublin Bay approximately 9.5km north of the site. However, given the minimum distance to this SAC (7.7km), and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. In the absence of mitigation, no significant effects on the qualifying interests of this SAC are likely.  Foul wastewater will be retained on site and be treated via wastewater treatment system prior to discharge into the ground. No significant effects on European sites are foreseen via foul water drainage.  No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
IE000713	Ballyman Glen SAC	OUT	Conservation Objectives The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Petrifying springs with tufa formation (Cratoneurion) [7220] Alkaline fens [7230]

European Site Code	Name	Screened IN/OUT	Details/Reason
-Site Code		114/001	Potential Impacts
			The proposed development site is located approximately 9.9km from this SAC. There is no direct or indirect hydrological pathway between the proposed development site and this SAC.  No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
IE000206	North	OUT	Conservation Objectives
1200200	Dublin Bay SAC	001	The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests  Mudflats and sandflats not covered by seawater at low tide [1140]  Annual vegetation of drift lines [1210]  Salicornia and other annuals colonising mud and sand [1310]  Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]  Mediterranean salt meadows (Juncetalia maritimi) [1410]  Embryonic shifting dunes [2110]  Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]  Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]  Humid dune slacks [2190]  Petalophyllum ralfsii (Petalwort) [1395]
			Potential Impacts
			The proposed development site is located approximately 12.5km from this SAC. There is no direct hydrological pathway between the proposed development site and this SAC.
			There is a weak indirect hydrological pathway from the proposed development site to this SAC via surface water drainage. Post onsite attenuation, it is proposed to discharge surface water to the Whitechurch stream which flows 30m from the south-eastern boundary of the site. This stream joins the River Dodder which ultimately outfalls to Dublin Bay approximately 9.5km north of the site. However, given the minimum distance to this SAC (12.5km), and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. In the absence of mitigation, no significant effects on the qualifying interests of this SAC are likely.  Foul wastewater will be retained on site and be treated via wastewater treatment system prior to discharge into the ground. No significant effects on European sites are foreseen via foul water drainage.

European Site Code	Name	Screened IN/OUT	Details/Reason
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
IE003000	Rockabill to Dalkey Island SAC	OUT	Conservation Objectives The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Reefs [1170]
			Phocoena phocoena (Harbour Porpoise) [1351]
			Potential Impacts
			The proposed development site is located approximately 12.8km from this SAC. There is no direct or indirect hydrological pathway between the proposed development site and this SAC.
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
IE000714	Bray Head SAC	ОИТ	Conservation Objectives  The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030]
			Potential Impacts
			The proposed development site is located approximately 15km from this SAC. There is no direct or indirect hydrological pathway between the proposed development site and this SAC.
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
Special Prote	ection Areas		
IE004040	Wicklow Mountains SPA	OUT	Conservation Objectives The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Merlin (Falco columbarius) [A098] Peregrine (Falco peregrinus) [A103]
			Potential Impacts

European Site Code	Name	Screened IN/OUT	Details/Reason
			The proposed development site is located approximately 3.1km from this SPA. There is no direct or indirect hydrological pathway between the proposed development site and this SPA.  No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
IE004024	South Dublin Bay and River Tolka Estuary SPA	ОИТ	Conservation Objectives The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Light-bellied Brent Goose (Branta bernicla hrota) [A046] Oystercatcher (Haematopus ostralegus) [A130] Ringed Plover (Charadrius hiaticula) [A137] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149] Bar-tailed Godwit (Limosa lapponica) [A157] Redshank (Tringa totanus) [A162] Black-headed Gull (Chroicocephalus ridibundus) [A179] Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Wetland and Waterbirds [A999]
			Potential Impacts
			The proposed development site is located approximately 7.6km from this SPA. There is no direct hydrological pathway between the proposed development site and this SPA.
			There is a weak indirect hydrological pathway from the proposed development site to this SPA via surface water drainage. Post onsite attenuation, it is proposed to discharge surface water to the Whitechurch stream which flows 30m from the south-eastern boundary of the site. This stream joins the River Dodder which ultimately outfalls to Dublin Bay approximately 9.5km north of the site. However, given the minimum distance to this SPA (7.6km), and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. In the absence of mitigation, no significant effects on the qualifying interests of this SPA are likely.
			Foul wastewater will be retained on site and be treated via wastewater treatment system prior to discharge into the ground. No significant effects on European sites are foreseen via foul water drainage.

European Site Code	Name	Screened IN/OUT	Details/Reason
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
IE004006	North Bull Island SPA	OUT	Conservation Objectives The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Light-bellied Brent Goose (Branta bernicla hrota) [A046] Shelduck (Tadorna tadorna) [A048] Teal (Anas crecca) [A052] Pintail (Anas acuta) [A054] Shoveler (Anas clypeata) [A056] Oystercatcher (Haematopus ostralegus) [A130] Golden Plover (Pluvialis apricaria) [A140] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149] Black-tailed Godwit (Limosa limosa) [A156] Bar-tailed Godwit (Limosa lapponica) [A157] Curlew (Numenius arquata) [A160] Redshank (Tringa totanus) [A162] Turnstone (Arenaria interpres) [A169] Black-headed Gull (Chroicocephalus ridibundus) [A179] Wetland and Waterbirds [A999]
			Potential Impacts
			The proposed development site is located approximately 12.5km from this SPA. There is no direct hydrological pathway between the proposed development site and this SPA.
			There is a weak indirect hydrological pathway from the proposed development site to this SPA via surface water drainage. Post onsite attenuation, it is proposed to discharge surface water to the Whitechurch stream which flows 30m from the south-eastern boundary of the site. This stream joins the River Dodder which ultimately outfalls to Dublin Bay approximately 9.5km north of the site. However, given the minimum distance to this SPA (12.5km), and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. In the absence of mitigation, no significant effects on the qualifying interests of this SPA are likely.  Foul wastewater will be retained on site and be treated via
			wastewater treatment system prior to discharge into the ground.

European Nam Site Code	e Scree		Details/Reason
			No significant effects on European sites are foreseen via foul water drainage.  No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
Iris	h-West O	UT	Conservation Objectives  The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.
			Qualifying Interests Common Scoter (Melanitta nigra) [A065] Red-throated Diver (Gavia stellata) [A001] Great Northern Diver (Gavia immer) [A003] Fulmar (Fulmarus glacialis) [A009] Manx Shearwater (Puffinus puffinus) [A013] Shag (Phalacrocorax aristotelis) [A018] Cormorant (Phalacrocorax carbo) [A017] Little Gull (Larus minutus) [A177] Kittiwake (Rissa tridactyla) [A188] Black-headed Gull (Chroicocephalus ridibundus) [A179] Common Gull (Larus canus) [A182] Lesser Black-backed Gull (Larus fuscus) [A183] Herring Gull (Larus argentatus) [A184] Great Black-backed Gull (Larus marinus) [A187] Little Tern (Sterna albifrons) [A195] Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Puffin (Fratercula arctica) [A204] Razorbill (Alca torda) [A200] Guillemot (Uria aalge) [A199]  Potential Impacts The proposed development site is located approximately 12.6km from this SPA. There is no direct hydrological pathway between the proposed development site and this SPA. There is a weak indirect hydrological pathway from the proposed development site to this SPA via surface water drainage. Post onsite attenuation, it is proposed to discharge surface water to the Whitechurch stream which flows 30m from the south-eastern boundary of the site. This stream joins the River Dodder which ultimately outfalls to Dublin Bay approximately 9.5km north of the site. However, given the minimum distance to this SPA (12.6km), and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. In

European	Name	Screened	Details/Reason
Site Code		IN/OUT	
			the absence of mitigation, no significant effects on the qualifying interests of this SPA are likely.
			Foul wastewater will be retained on site and be treated via wastewater treatment system prior to discharge into the ground. No significant effects on European sites are foreseen via foul water drainage.
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.
			No significant effects are likely.
IE004172	Dalkey Islands SPA	OUT	Conservation Objectives The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.  Qualifying Interests Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194]
			Potential Impacts
			The proposed development site is located approximately 12.8km from this SPA. There is no direct or indirect hydrological pathway between the proposed development site and this SPA.
			No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.

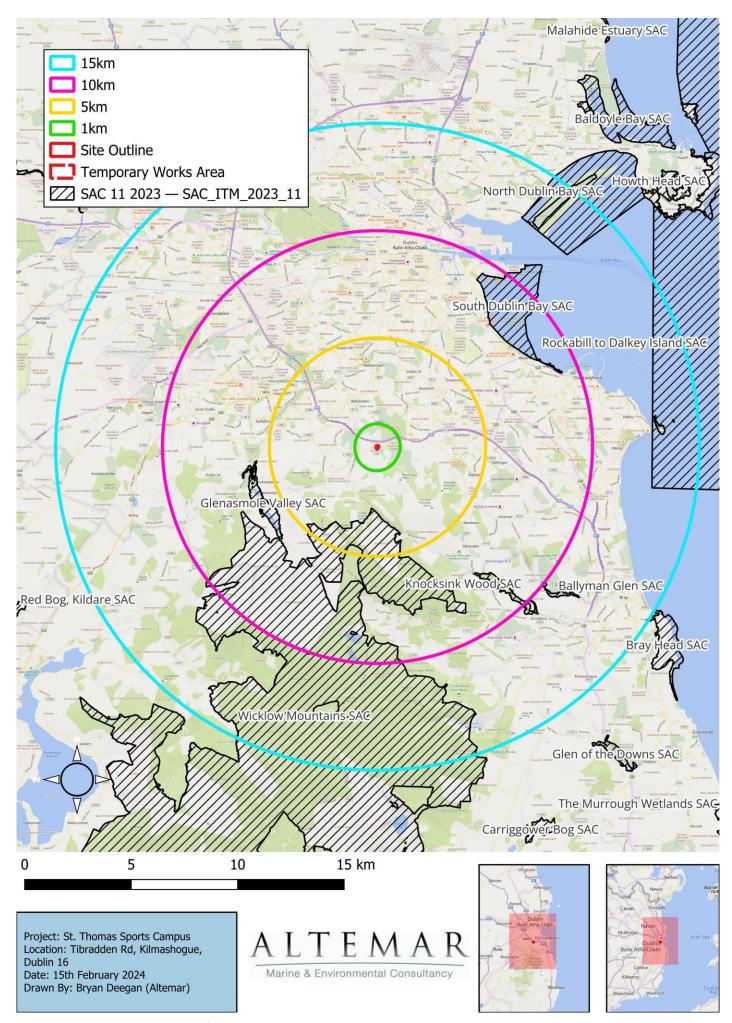


Figure 18. SACs within 15km of the subject site

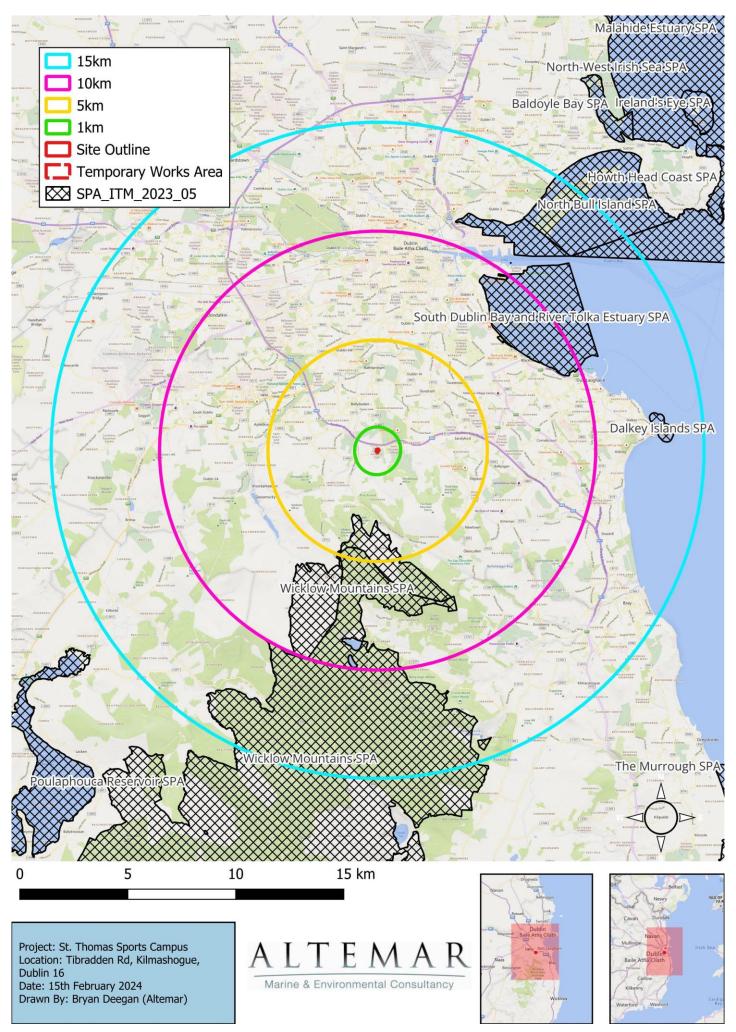


Figure 19. SPAs within 15km of the subject site



Figure 20. Watercourses within 1km of the subject site

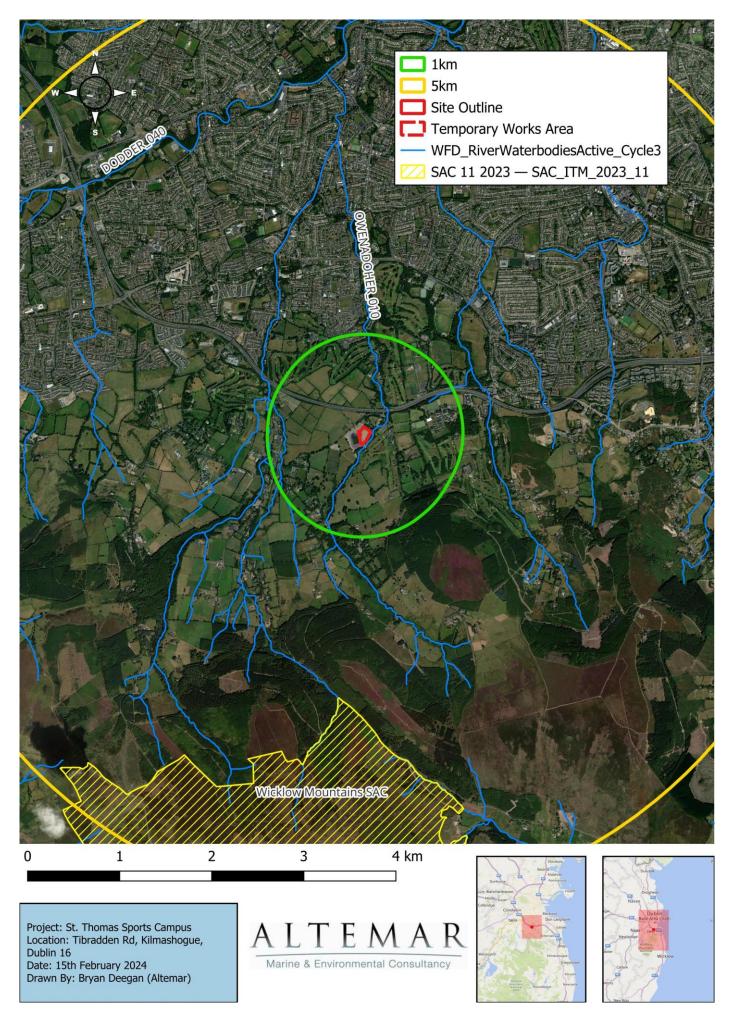


Figure 21. Watercourses and SACs near the subject site

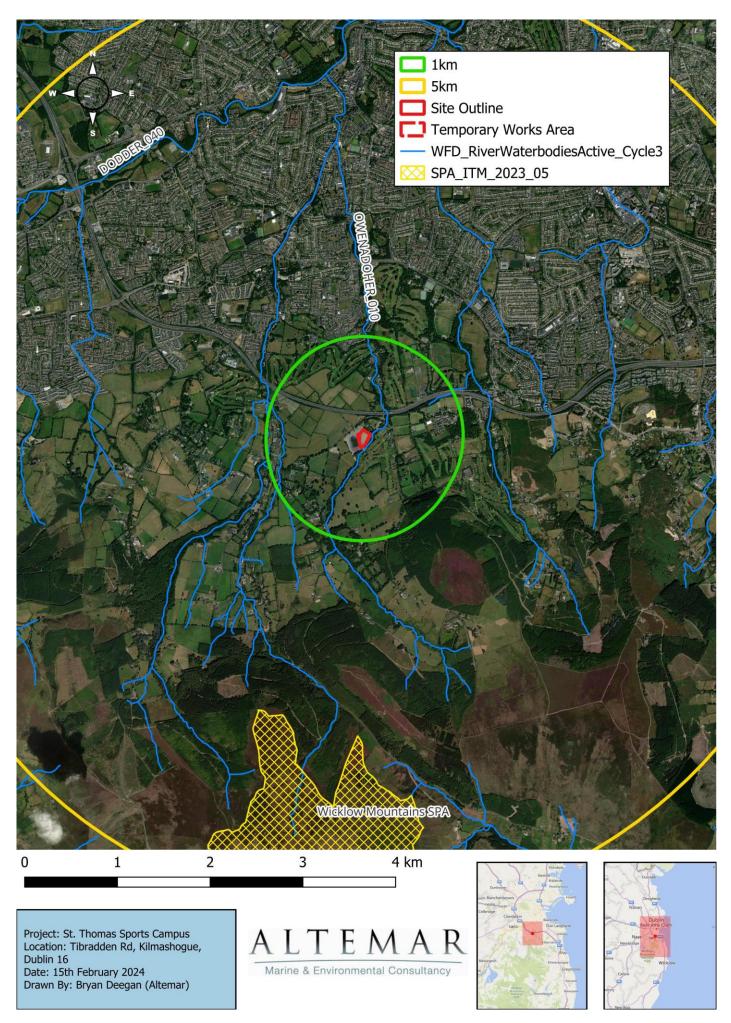


Figure 22. Watercourses and SPAs near the subject site

#### In-Combination Effects

Phase I of the proposed project was recently completed on site. This involved works within the proposed development site and works in the vicinity of the proposed development site. The proposed development site has recently undergone extensive site works and is now primarily planted with Amenity Grassland in addition to Dry Meadows and Grassy Verges (Fossitt, 2000).

Works took place in the riparian woodland and within the White Church Stream. The works included the felling of trees, preparation of paths, lighting and a culvert within the watercourse.

It is important to note that there is no direct pathway to Natura 2000 Sites from the proposed development site. In particular in relation to otter, Wicklow Mountains SAC is not located upstream of the proposed development and it would not be expected that the range of otter from the SAC would extend into the proposed development Zone of Influence. Bats are not a qualifying interest of nearby SAC's. As a result despite the effects on local biodiversity, some species of which are listed under Annex II of the Habitats Directive, the works would not of impacted on the SCI's of Natura 2000 sites proximate designated sites, within the potential ZoI.

There are no other recent development proposals (last five years) located in the vicinity of the subject site as identified on the Department of Housing, Local Government and Heritage's 'National Planning Application Database' portal. As a result, it is considered that in-combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. It is concluded that no significant effects on Natura 2000 sites are likely as a result of the proposed development in combination with other projects. No in combination effects are foreseen.

No projects in the vicinity of the proposed development would be seen to have a significant in combination effect on Natura 2000 sites.

### Conclusions

The nearest Natura 2000 sites to the proposed development site are the Wicklow Mountains SAC (2.8km) and the Wicklow Mountains SPA (3.1km). There is no hydrological connection to either of these sites from the proposed development site. Post on-site attenuation, it is proposed to discharge surface water to The Whitechurch Stream. The River Dodder ultimately outfalls to Dublin Bay approximately 9.5km North of the subject site. There are five Natura 2000 sites at Dublin Bay, namely South Dublin Bay SAC (7.7km), North Dublin Bay SAC (12.5km), South Dublin Bay and River Tolka Estuary SPA (7.6km), North Bull Island SPA (12.5km) and North-West Irish Sea SPA (12.6km). It is therefore considered that there is a weak indirect hydrological connection to these Natura 2000 sites. However, given the minimum distance to each site, and the extensive surface water drainage network via the Whitechurch Stream and River Dodder, in the absence of mitigation measures, any pollutants, dust or silt-laden run-off discharged from the site during construction or operational phases of the proposed development will be dispersed, diluted and ultimately settle within these watercourses and the marine environment at Dublin Bay. No significant effects on European sites are foreseen via surface water drainage. Foul wastewater will be retained on site and be treated via wastewater treatment system prior to discharge into the ground. No significant effects on European sites are foreseen via foul water drainage. In the absence of mitigation, no significant effects on European sites are likely. No specific mitigation is required to prevent significant effects on European sites.

Having taken into consideration the foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution and settlement effect within the existing public surface water drainage network via the indirect pathway during operation, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or European site.

On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

# Data Used for AA Screening

NPWS site synopses and Conservation objectives of sites within 15km were assessed. The most recent SAC and SPA boundary shapefiles were downloaded and overlaid on Bing Road maps and satellite imagery.

#### References

- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government 2009; http://www.npws.ie/publications/archive/NPWS 2009 AA Guidance.pdf
- 2. 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;
- 3. Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive Guidance for Planning Authorities March 2010.
- 4. Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission;
- Guidance document on the implementation of the birds and habitats directive in estuaries and coastal zones with particular attention to port development and dredging; <a href="http://ec.europa.eu/environment/nature/Natura2000/management/docs/guidance\_doc.pdf">http://ec.europa.eu/environment/nature/Natura2000/management/docs/guidance\_doc.pdf</a>
- 6. Managing EUROPEAN Sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC, European Commission 2000;
- 7. The Status of EU Protected Habitats and Species in Ireland.

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- 9. NPWS (2013) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
- 10. NPWS (2017) Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
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- 14. NPWS (2013) Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
- 15. NPWS (2017) Conservation Objectives: Bray Head SAC 000714. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
- 16. NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
- 17. NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

- 18. NPWS (2023) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.
- 19. NPWS (2021) Conservation objectives for Dalkey Islands SPA [004172]. Generic Version 8.0. Department of Housing, Local Government and Heritage.
- 20. NPWS (2021) Conservation objectives for Wicklow Mountains SPA [004040]. Generic Version 8.0. Department of Housing, Local Government and Heritage.