



**PROVISION OF INFORMATION
FOR SCREENING FOR APPROPRIATE ASSESSMENT
PROPOSED DEVELOPMENT, BALLYOGAN COURT, DUBLIN 18**

Prepared for Dún Laoghaire-Rathdown County Council

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1 Introduction

The information in this report forms part of, and should be read in conjunction with the documentation accompanying the planning application for a proposed residential development (hereafter “the proposed development”) on lands at Ballyogan Court, Dublin 18 (hereafter “the subject lands”).

This report which contains information required for the competent authority (in this instance Dún Laoghaire-Rathdown County Council) to undertake a screening for Appropriate Assessment (AA), has been prepared by Scott Cawley Ltd. It provides information on and assesses the potential for the proposed development to impact on Natura 2000 sites (hereafter “European sites”)¹.

It is necessary that the proposal has regard to Article 6 of the *Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora* (as amended) (hereafter “the Habitats Directive”). This is transposed in Ireland primarily by *the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011)* (hereafter “the Birds and Habitats Regulations”) and the Planning and Development (Amendment) Act, 2010 as amended.

An AA is required if likely significant effects on European sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects.

It is the responsibility of the competent authority to make a decision as to whether or not the proposed development is likely to have significant effects on European sites, either individually or in combination with other plans or projects. In accordance with the legislation and national guidance, the competent authority issues an AA Screening Determination which will set out their decision and the reasons for it.

Following the preparation of this screening statement it may be objectively concluded that there is no possibility of any significant effects on any European sites arising from the proposed development, either alone or in combination with other plans or projects. Therefore it is our view that an Appropriate Assessment is not required in this instance. The information in the tables below provide a summary of the information gathered for this screening exercise and the conclusions made.

2 Methodology

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

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities*. (Department of Environment, Heritage and Local Government, 2010 revision).
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities*. Circular NPW 1/10 & PSSP 2/10.
- *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); hereafter referred to as the EC Article 6

¹ Natura 2000 sites are defined under the Habitats Directive (Article 3) as a European ecological network of special areas of conservation composed of sites hosting the natural habitat types listed in Annex I and habitats of the species listed in Annex II. The aim of the network is to aid the long-term survival of Europe's most valuable and threatened species and habitats. In Ireland these sites are designed as *European Sites* - defined under the Planning Acts and/or Birds and Habitats Regulations as (a) a candidate site of Community importance, (b) a site of Community importance, (c) a candidate special area of conservation, (d) a special area of conservation, (e) a candidate special protection area, or (f) a special protection area. They are commonly referred to in Ireland as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)

Guidance Document. The guidance within this document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive.

- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (EC Environment Directorate-General, updated April 2015); hereafter referred to as MN2000.
- *Communication from the Commission on the precautionary principle*. European Commission (2000).

The above referenced guidance sets out a staged process for carrying out Appropriate Assessment. To determine if a full Appropriate Assessment is required, documented screening is required. Screening identifies the likely significant effects on European sites, if any, which would arise from a proposed plan or project, either alone or in combination with other plans and projects.

If the conclusions at the end of screening are that there is no likelihood of significant effects occurring on any European sites, as a result of the proposed plan or project, either alone or in combination with other plans and projects, then there would be no requirement to undertake a full Appropriate Assessment. However, even if screening makes a finding of no significant effects, and therefore concludes that Appropriate Assessment is not required, these findings must be clearly documented in order to provide transparency of decision-making, and to ensure the application of the '*precautionary principle*'².

Screening for Appropriate Assessment involves the following:

- Determining whether a project or plan is directly connected with or necessary to the conservation management of any European sites³;
- Describing the details of the project/plan proposals and other plans or projects that may cumulatively affect any European sites (see Table 1);
- Describing the characteristics of relevant European sites (Table 2); and
- Assessing the likelihood and significance of effects on relevant European sites (see Table 2).

The information that was collected to allow the competent authority to screen the proposal was based on a desktop study carried out on 28th February 2018. Information relied upon included the following information sources, which included maps, ecological and water quality data:

- Ordnance Survey of Ireland mapping and aerial photography available from www.osi.ie;
- Online data available on protected species as held by the National Biodiversity Data Centre (NBDC) from www.biodiversityireland.ie;
- Online data available on European sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie;

² One of the primary foundations of the precautionary principle, and globally accepted definitions, results from the work of the Rio Declaration. Principle #15 declaration notes:

"In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation."

³ In this instance the proposed development is not directly connected with or necessary to the conservation management of any European sites.

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- Information on land-use zoning from the online mapping of the Department of Housing, Planning, Community and Local Government from www.myplan.ie;
 - Information on water quality in the area available from www.epa.ie;
 - Information on the Eastern River Basin District from www.wfdireland.ie;
 - Information on soils, geology and hydrogeology in the area available from www.gsi.ie;
 - Information on the location, nature and design of the proposed development supplied by the applicant's design team;
 - Information on the status of EU protected habitats and species in Ireland (National Parks & Wildlife Service, 2013a & 2013b); and,
 - Information on the *Conservation Status of Birds in Ireland 2014 – 2019* (Colhoun & Cummins, 2014).

Other Key Information Sources:

- *National Biodiversity Action Plan 2017 – 2021* (DCHG, 2017);
- *River Basin Management Plan for Ireland 2018-2021* (DHPLG, 2017);
- *Dún-Laoghaire - Rathdown County Development Plan 2016 -2022* (DLRCC, 2016); and,
- *Dún-Laoghaire - Rathdown Biodiversity Plan 2009 – 2013*; (DLRCC, 2009).

Table 1 Overview of the Proposed Development and its Receiving Environment

<p>Brief Site Description</p>	<p>The proposal is for a residential development of 119 units (59 no. two-bed houses, 8 no. three-bed houses, and 52 no. apartments over 4 storeys) on a site of approximately 2.4 ha located at centroid grid reference O 21024 24524, at Ballyogan Court, Dublin 18.</p> <p>Based on examination of orthophotography⁴ and a site survey carried out on 4th January 2018, the proposed development site consists of the following habitats; dry meadow and grassy verges, wet grassland, scrub, treelines, hedgerow, recolonising bare ground, and buildings and artificial surfaces. The proposed development site is bordered to the north by Ballyogan Court, to the east by the M50 and Ballyogan Vale, to the south by Ballyogan Wood, and to the west by Ballyogan Drive. The surrounding lands consist of amenity grassland, artificial surfaces and residential property.</p> <p>The subject lands and immediate surrounding environment are currently zoned as 'R2 – Existing Residential' with a Local Authority Zone description of 'Objective A – To protect and-or improve residential amenity' (Dún Laoghaire-Rathdown County Council, 2016).</p>
<p>Features of the Surrounding Environment</p>	<p>The desktop study found no records of any species or habitats for which European sites listed in Table 2 are designated within the subject lands or their immediate environs. The following species (for which European sites listed in Table 2 have been designated) have been recorded within 2km of the proposed development⁵:</p> <ul style="list-style-type: none"> • Black-headed Gull (<i>Croicocephalus ridibundus</i>): there are three records within 2km, all located approximately 1.9km to the east of the proposed development site (two from 2010 and one from 2011). • Otter (<i>Lutra lutra</i>): there are two records within 2km, one from 2016 ca. 1.6km north west of the proposed development site and one from 1980 located ca. 800m east of the proposed development site. <p>The subject lands fall entirely within the Ovaca-Vartry water catchment, with the Carrickmines Stream the closest waterbody, ca. 100m to the northeast. The surface water quality within the Carrickmines Stream, downstream of the proposed development at RS10C040350 is 'Q3-4 – moderate status'. It has a Water Framework Directive (WFD) status 2010-2015 of 'Moderate', and a WFD risk score of 'At risk of not achieving good status'⁶.</p> <p>The Carrickmines Stream discharges to the Shanganagh River approximately 4.4km downstream of the proposed development site which outfalls</p>

⁴ According to examination of orthophotographs on Bing maps www.bing.com/maps accessed 28th February 2018.

⁵ According to the National Biodiversity Data Centre (NBDC) online data www.biodiversity.ie accessed 28th February 2018. This excludes low resolution records that cover areas >1km².

⁶ According to the Environmental Protection Agency (EPA) Map Viewer: www.epa.ie accessed 28th February 2018.

Table 1 Overview of the Proposed Development and its Receiving Environment

	<p>to the Southwestern Irish Sea-Killiney Bay Coastal waterbody a further 1.7km downstream. The surface water quality within the Shanganagh River at RS10S010600 is 'Q4 – good status'. The most recent surface water quality data for the Southwestern Irish Sea-Killiney Bay (2010-2012) indicates that it is 'Unpolluted', it has a WFD status (2010-2015) of 'High', and it has a WFD risk score of 'At risk of not achieving good status'. Under the "Trophic Status Assessment Scheme" classification of the EPA, "Unpolluted" means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present (EPA 2015).</p> <p>Several European sites listed in Table 2 are located in the downstream receiving environment within the Southwestern Irish Sea-Killiney Bay coastal waterbody, with which the development is connected by the local foul and surface water networks.</p> <p>The proposed development is within the 'Wicklow' groundwater body and is classified as 'Poorly productive bedrock' with groundwater vulnerability to human activities being mapped as 'High'⁷. The most recent WFD groundwater status for the site (2007-2015) is 'Good'. The bedrock formation on site is 'Granites and other Igneous Intrusive rocks'. It is also described as 'Poor Aquifer – Bedrock which is Generally Unproductive except for Local Zones'.</p>
<p>Description of the Proposed Development</p>	<p>Full details of the proposed development can be found in the applicant's planning application. In brief, the proposed development will comprise of 119 residential units (59 no. two bed houses, 8 no. three bed houses, and 52 no. apartments over 4 storeys) and all associated infrastructure necessary to service them. This includes a network of foul water and surface water pipes, watermains, roads, footpaths and car parking (146 spaces). The duration of the development construction phase is estimated to be 2 years.</p> <p><u>Surface water</u></p> <p>The surface water generated from the proposed development will discharge to two existing surface water drains, one located to the north of the site and one located to the southeast of the site (further details can be found in the Drainage and Water Supply Report (Nicholas O'Dwyer Ltd, 2018)). From here, the surface water will join the existing surface water network (separate to the foul water network) and discharge to local watercourses within the Ovaca-Vartry water catchment which ultimately outfall to Killiney Bay .</p> <p>There will be three attenuation areas within the proposed development site, each with associated hydrobrakes, and all surface water will be attenuated to greenfield runoff levels. The surface water drainage network within the site will incorporate multiple Sustainable Urban Drainage</p>

⁷ According to the Geological Survey Ireland (GSI) Ground Water Data Viewer: www.gsi.ie accessed 28th February 2018.

Table 1 Overview of the Proposed Development and its Receiving Environment	
	<p>Systems (SUDS) measures including:</p> <ul style="list-style-type: none"> • Underground storage: storage by use of underground filter stone areas will provide a maintenance free system of retention of surface water. Flow of water through filter pipes will enable the excess discharge to flow out within the filter bed. • Swales: the position of swales around the perimeter roads and access route areas will mitigate the provision of drainage pipes to these roads. Swales will have a stone filter surround and porous pipe to slowly discharge the surface water. • Porous paving: the car parking areas for the apartments are designed with porous paving which will also utilise planar infiltration drainage through the stone sub-base below to an infiltration drain (includes some local storage for attenuation). • Tree bases and planting areas: where trees and plants are located along parking areas, there will be a system of filters and gully connections to a tree pit storage system which will incorporate surplus water retention. This system combined with the porous paving will reduce the flow rate from roads and paving and provide an additional filter for pollutants. • Filer drainage: filter drains will be incorporated into the design of the proposed development. <p><u>Foul Water</u></p> <p>The foul water generated from the proposed development will discharge to two existing foul water drains, one located to the north of the site and one located to the southeast of the site (further details can be found in the Drainage and Water Supply Report (Nicholas O’Dwyer Ltd, 2018)). From here, the foul water will travel via the existing public foul drainage network to Shanganagh Waste Water Treatment Plant (WWTP) for treatment prior to discharge at Killiney Bay. The proposed development will have an overall P.E (Population Equivalent) of 408.</p>
<p>Defining the Zone of Influence of the Proposed Works</p>	<p>The zone of influence (Zoi) is a distance within which the proposed works could potentially affect the conservation condition of QI habitats or species. There is no set recommended distance for which European sites are considered as being relevant (<i>i.e.</i> within the Zoi of proposed works) for AA. Available guidance (NPWS, 2010) recommends that “<i>the distance should be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects</i>”. As a general rule of thumb, it is often considered appropriate to examine all European sites within 15km as a starting point. In some instances where there are far reaching hydrological/hydrogeological connections, a whole river catchment or a groundwater aquifer may need to be included in determining the Zoi. All European sites within 15km of the proposed works are listed in Table 2 and illustrated on Figure 1. In this case, the distance of 15km exceeds the potential zone of influence of the proposed works and any likelihood of significant effects in relation to European Sites beyond 15km</p>

Table 1 Overview of the Proposed Development and its Receiving Environment	
	<p>can be ruled out. In this instance, there is a potential connection between the subject lands and European sites in the Southwestern Irish Sea and Killiney Bay via the existing surface water and foul water networks which ultimately discharge to Killiney Bay.</p>
<p>Potential pressures on European Sites as a result of the proposed development</p>	<p>Pressures from loss of habitats to QI Species</p> <p>The subject lands do not physically overlap with any European sites. The habitats within the proposed development site consist of dry meadow and grassy verges, wet grassland, scrub, treelines, hedgerow, recolonising bare ground, and buildings and artificial surfaces, none of which are habitats listed under Annex I of the Habitats Directive. These habitats are not connected with any habitats within European sites. No mobile fauna species for which European sites were designated are known or considered likely to use the habitats within the subject lands. There is therefore no potential for significant effects on European sites resulting from loss of habitats or direct loss of QI species as a result of the proposed development.</p> <p>Existing pressures on Water Quality within European sites in proximity to the site</p> <p>Several habitats for which European sites downstream of the proposed development are designated were failing to meet favourable conservation status at the time of writing. For some of these, water pollution is considered a threat ranked as being of “<i>high importance</i>” (NPWS, 2013).</p> <p><i>Pressures from surface water</i></p> <p>Surface water from the proposed development will be discharged to the local surface water network via two discharge points, one to the north of the site and one to the southeast of the site. From here they will join the existing surface water network and discharge to local watercourses within the Ovaca-Vartry water catchment which ultimately outfall to Killiney Bay. There is some potential for contaminants generated during the construction phase of the proposed development to enter the downstream receiving environment, however, there is no possibility for significant effects on European sites for the following reasons:</p> <ul style="list-style-type: none"> • Any pollution event is likely to be short in duration (i.e. confined to storm events); • The works will be short in duration (spanning a period of approximately 2 years); and, • The significant distance between the subject lands and downstream European sites means that it is extremely unlikely that sediments or pollutants from the proposed development will result in any discernible effects. <p><i>Pressures from foul water</i></p> <p>Foul water from the proposed development will be discharged to the local foul sewer network via two discharge points, one to the north of the site and one to the southeast of the site. From here they will be transferred to Shanganagh WWTP for treatment prior to discharge into the Northwestern Irish Sea – Killiney Bay coastal waterbody. Shanganagh WWTP is operating below its capacity of 186,000 P.E. with a current</p>

Table 1 Overview of the Proposed Development and its Receiving Environment	
	<p>operational loading of 96,389 P.E (Irish Water, 2016). The proposed development is anticipated to result in an additional foul water loading value of 408 P.E to Shanganagh WWTP which will not result in the WWTP operating above capacity.</p> <p>There is no possibility of the Shanganagh WWTP effluent having significant effects on the European sites downstream due to the following reasons, as outlined in the Shanganagh WWTP Annual Environmental Report (Irish Water, 2016):</p> <ul style="list-style-type: none"> • Shanganagh WWTP was compliant with the ELV's set in the wastewater discharge licence; • Discharge from Shanganagh WWTP does not have an observable negative impact on water quality; • Discharge from Shanganagh WWTP does not have an observable negative impact on the Water Framework Directive Status; and, • Discharges from Shanganagh WWTP are not considered to have an impact on the bathing waters of Killiney Beach.
<p>Other existing or proposed plans or projects nearby which may lead to cumulative effects on European sites.</p>	<p>Existing pressures on water quality within European sites in proximity to the site</p> <p><i>Pressures on European sites in Killiney Bay from surface water</i></p> <p>The potential for “in-combination” effects of proposed plans and projects within the Dún Laoghaire-Rathdown County Development Plan 2016-2022, Dublin City Development Plan 2011-2017, Wicklow County Development Plan 2016-2022, and other county level land use plans which can influence conditions in the Northwestern Irish Sea via rivers and other surface water features, was also considered.</p> <p>The Northwestern Irish Sea – Killiney Bay coastal waterbody is currently classified as ‘Unpolluted’ and the pollutant content of future surface water discharges to Killiney Bay is considered likely to be decreased in the long-term. This is because it is an objective of the Greater Dublin Strategic Drainage Study, and all development plans within the Greater Dublin Area to include Sustainable Urban Drainage Systems in new development. Together these objectives are considered likely to reduce pressures on designated marine and intertidal species and habitats in Killiney Bay.</p> <p>It is considered extremely unlikely that during construction, a pollution event would occur of a magnitude that would have any adverse effects on water quality in Killiney Bay, or affect the Qualifying Interest/Special Conservation Interests of the European sites therein, due to the distance between the site and the discharge point to Killiney Bay, and the potential for dilution in the surface water network before entering Killiney Bay. There is therefore no potential for cumulative impacts.</p> <p><i>Pressures on European sites in Killiney Bay from foul water</i></p> <p>The subject lands, fall within the catchment of the Shanganagh Waste Water Treatment Plant (WWTP). During operation, foul effluent generated from the proposed development will be carried by the public sewerage network to Shanganagh WWTP for treatment prior to discharge to the Northwestern Irish Sea – Killiney Bay. Shanganagh WWTP operates below its capacity of 186,000 P.E. with a current operational loading of 96,389</p>

Table 1 Overview of the Proposed Development and its Receiving Environment

	<p>P.E (Irish Water, 2016).</p> <p>Any existing or proposed projects discharging to the plant have the potential to act cumulatively to reduce water quality in Northwestern Irish Sea – Killiney Bay, affecting European sites therein. However, no significant effects from discharge arising from the proposed development are predicted due to the following:</p> <ul style="list-style-type: none"> • Shanganagh WWTP was compliant with the ELV’s set in the wastewater discharge licence; • Discharge from Shanganagh WWTP does not have an observable negative impact on water quality; • Discharge from Shanganagh WWTP does not have an observable negative impact on the Water Framework Directive Status; • Discharges from Shanganagh WWTP are not considered to have an impact on the bathing waters of Killiney Beach; and, • The Northwestern Irish Sea – Killiney Bay coastal waterbody is currently classified as ‘Unpolluted’.
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Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site
Special Areas of Conservation (SAC)			
South Dublin Bay SAC [000210]	ca. 4.8km north	Conservation Objectives Version 1.0 (22/08/13) Annex I Habitats : 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]	No, due to the distance and the substantial marine open water buffer between the proposed development site and the European site.
Knocksink Wood SAC [000725]	ca. 5.2km south-west	Conservation Objectives Generic Version 6.0 (21/02/18) Annex I Habitats: *Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] *Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0]	No, due to distance and the absence of any hydrological or other potential impact pathways between the proposed development site and the European site.

⁸ “Qualifying Interests” for SACs and “Special Conservation Interests” for SPAs based on relevant Statutory Instruments for each SPA, and NPWS Conservation Objectives for SACs downloaded from www.npws.ie in November 2017.

⁹ For significant effects to arise, there must be a risk enabled by having a 'source' (e.g. construction works at a proposed development site), a 'receptor' (e.g. a SAC), and a pathway between the source and the receptor (e.g. a watercourse connecting a proposed development site to a SAC). The identification of a pathway does not automatically mean significant effects will arise. The likelihood for significant effects will depend upon the characteristics of the source (e.g. duration of construction works), the characteristics of the pathway (e.g. water quality status of watercourse receiving run-off from construction) and the characteristics of the receptor (e.g. the ecology including conservation status of the SAC reason for designation). When expert judgment determines, that significant effects are likely to arise, both the pathway, and the European site are considered “Relevant”, and an Appropriate Assessment is triggered.

Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site
Ballyman Glen SAC [000713]	ca. 5.6km south-east	<p>Conservation Objectives Generic Version 6.0 (21/02/18)</p> <p>Annex I Habitats:</p> <p>*Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]</p> <p>Alkaline fens [7230]</p>	<p>No sites are “Relevant” to the Proposed Development. (European sites are “Relevant” where a relevant source-pathway-receptor link⁹ exists).</p> <p>No, due to distance and the absence of any hydrological or other potential impact pathways between the proposed development site and the European site.</p>
Wicklow Mountains SAC [002122]	ca. 6.3km south-west	<p>Conservation Objectives Version 1 (31/07/17)</p> <p>Annex I Habitats:</p> <p>Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]</p> <p>Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130]</p> <p>Natural dystrophic lakes and ponds [3160]</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]</p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and sub-mountain areas, in Continental Europe) [6230]</p> <p>Blanket bogs (* if active only) [7130]</p> <p>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]</p>	<p>No, due to distance and the absence of any hydrological or other potential impact pathways between the proposed development site and the European site.</p>

Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site
		Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] Annex II Species: Otter - <i>Lutra lutra</i> [1355]	No sites are “Relevant” to the Proposed Development. (European sites are “Relevant” where a relevant source-pathway-receptor link ⁹ exists).
Rockabill to Dalkey Island SAC [003000]	ca. 6.4km east	Conservation Objectives Version 1.0 (07/05/13) Annex I Habitats: [1170] Reefs Annex II Species: [1351] Harbour porpoise <i>Phocoena phocoena</i>	Whilst there is a potential source-receptor pathway between the proposed development and the European site, no significant effects are predicted. 1. Surface water generated during construction may carry silt, oils, or other chemicals into the local surface water network which discharges to local watercourses in the Ovaca-Vartry water catchment which ultimately outfall to Killiney Bay. However, there will be no significant effects on the Qualifying Interests of the European site in view of the relevant conservation objectives. This judgement was informed by the following: <ul style="list-style-type: none"> • Any pollution event is likely to be short in duration (i.e. confined to storm events); • The works will be short in duration (spanning a period of approximately 2 years); • The distance and marine open water buffer between the subject lands and European site means that it is extremely unlikely that sediments or pollutants from the proposed development are likely to result in any

Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site No sites are “Relevant” to the Proposed Development. (European sites are “Relevant” where a relevant source-pathway-receptor link ⁹ exists).
			<p>discernible effects; and,</p> <ul style="list-style-type: none"> • The coastal waters in Killiney Bay are classed as ‘Unpolluted’ by the EPA. <p>2. Foul water generated during operation which will ultimately discharge to Killiney Bay via Shanganagh WWTP will not give rise to significant effects on the Qualifying Interests of the European site in view of the relevant conservation objectives. This judgement was informed by the following:</p> <ul style="list-style-type: none"> • Shanganagh WWTP was compliant with the ELV’s set in the wastewater discharge licence; • Discharge from Shanganagh WWTP does not have an observable negative impact on water quality; • Discharge from Shanganagh WWTP does not have an observable negative impact on the Water Framework Directive Status; and, • Discharges from Shanganagh WWTP are not considered to have an impact on the bathing water quality of Killiney beach.
Bray Head SAC [000714]	ca. 9.3km south-east	<p>Conservation Objectives Version 1.0 (11/04/17)</p> <p>Annex I Habitats :</p> <p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</p> <p>European dry heaths [4030]</p>	No, due to distance between the sites and the combination of there being a substantial marine open water buffer between the sites and in the case of European dry heaths the fact that this habitat is located above the shoreline and therefore there is no hydrological connection to it.
North Dublin Bay SAC	ca. 10km	Conservation Objectives Version 1.0 (06/11/13)	No, due to the distance and the substantial marine open

Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site No sites are "Relevant" to the Proposed Development. (European sites are "Relevant" where a relevant source-pathway-receptor link ⁹ exists).
[000206]	north-east	<p>Annex I Habitats:</p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p><i>Salicornia</i> and other annuals colonizing mud and sand [1310]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330]</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") [2120]</p> <p>*Fixed coastal dunes with herbaceous vegetation ("grey dunes") [2130]</p> <p>Humid dune slacks [2190]</p> <p>Annex II Species:</p> <p>Petalwort (<i>Petalophyllum ralfsii</i>) [1395]</p>	water buffer between the proposed development site and the European site.
Glenasmole Valley SAC [001209]	ca. 11.3km south-west	<p>Conservation Objectives Generic Version 6.0 (21/02/18)</p> <p>Annex I Habitats :</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco Brometalia</i>) (* important orchid sites) [6210]</p> <p><i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils</p>	No, due to distance and the absence of any hydrological or other potential impact pathways between the proposed development site and the European site.

Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site
		<p>(<i>Molinion caeruleae</i>) [6410]</p> <p>* Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]</p>	No sites are “Relevant” to the Proposed Development. (European sites are “Relevant” where a relevant source-pathway-receptor link ⁹ exists).
Glen of the Downs SAC [000719]	ca. 13.3km south-east	<p>Conservation Objectives Generic Version 6.0 (21/02/18)</p> <p>Annex I Habitats :</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p>	No, due to distance and the absence of any hydrological or other potential impact pathways between the proposed development site and the European site.
Howth Head SAC [000202]	ca. 13.5km north-east	<p>Conservation Objectives Version 1.0 (06/12/16)</p> <p>Annex I Habitats:</p> <p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</p> <p>European dry heaths [4030]</p>	No, due to distance between the sites and the combination of there being a substantial marine open water buffer between the sites and in the case of European dry heaths the fact that this habitat is located above the shoreline and therefore there is no hydrological connection to it.
Special Protection Areas (SPA)			
South Dublin Bay and River Tolka Estuary SPA [004024]	ca. 4.8km north-east	<p>Conservation Objectives Version 1.0 (09/03/15)</p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] [wintering]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130] [wintering]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137] [wintering]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A140] [wintering]</p> <p>Knot (<i>Calidris canutus</i>) [A143] [wintering]</p> <p>Sanderling (<i>Calidris alba</i>) [A144] [wintering]</p> <p>Dunlin (<i>Calidris 15etanu</i>) [A149] [wintering]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] [wintering]</p> <p>Redshank (<i>Tringa totanus</i>) [A162] [wintering]</p> <p>Black-headed Gull (<i>Croicocephalus ridibundus</i>) [A179] [wintering]</p>	<p>No. Whilst there is a linkage between the proposed development and the European site, no significant effects are predicted for the following reasons:</p> <ul style="list-style-type: none"> • There is no risk of disturbance to Special Conservation Interest bird species given the distance between the proposed development and the European site. • For reasons set out under Rockabill to Dalkey Island SAC above.

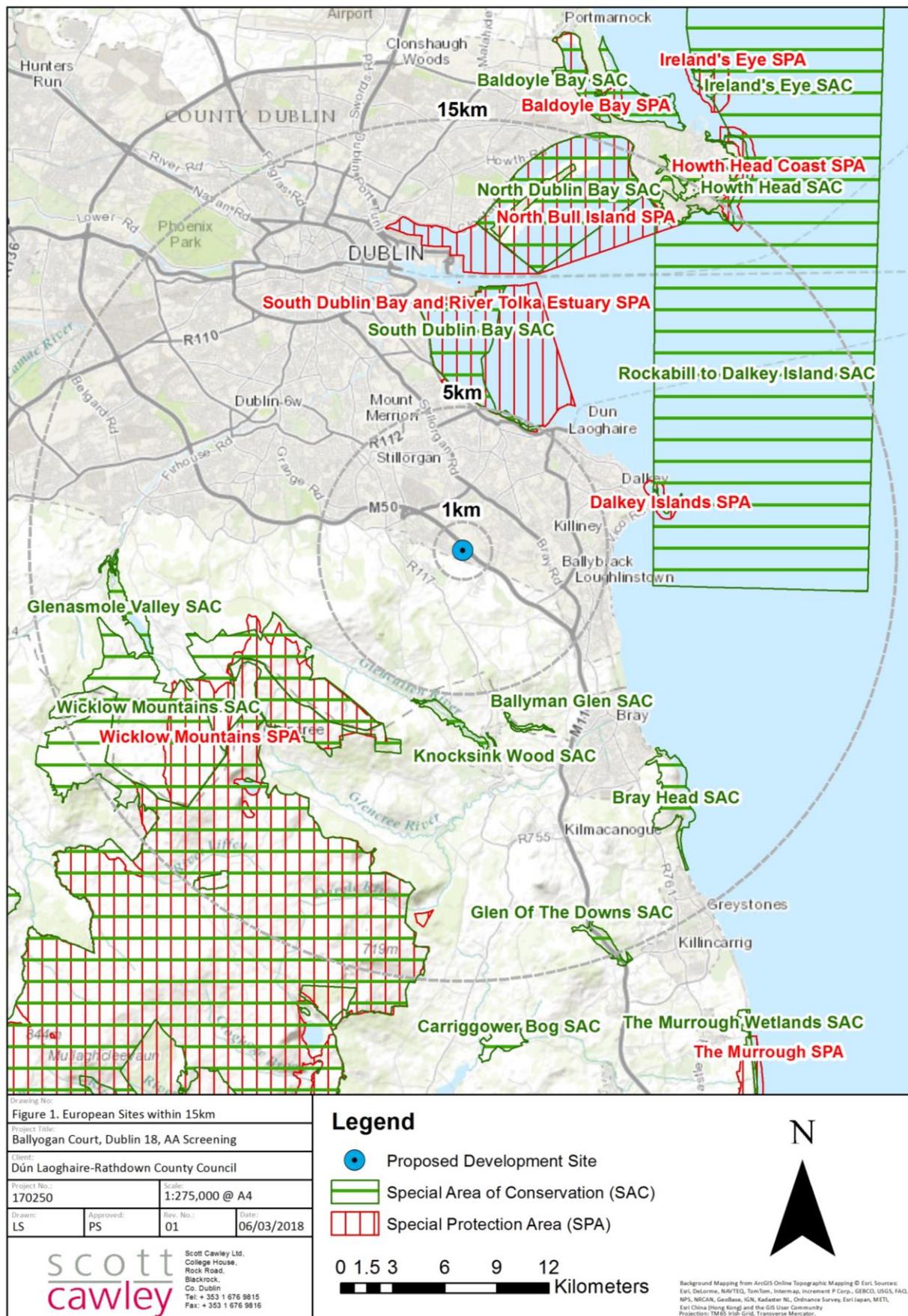
Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site No sites are “Relevant” to the Proposed Development. (European sites are “Relevant” where a relevant source-pathway-receptor link ⁹ exists).
		Roseate Tern (<i>Sterna dougallii</i>) [A192] [passage] Common Tern (<i>Sterna hirundo</i>) [A193] [breeding] Arctic Tern (<i>Sterna paradisaea</i>) [A194] [passage] Wetlands & Waterbirds [A999]	
Wicklow Mountains SPA [004040]	ca. 6.5km south-west	Conservation Objectives Generic Version 6.0 (21/02/18) Merlin (<i>Falco columbarius</i>) [A098] [breeding] Peregrine (<i>Falco peregrinus</i>) [A103] [breeding]	No. Given the distance between the sites, the subject lands are unlikely to be the SCI species core foraging area (ca. 0.8km for Merlin, and ca. 2km for Peregrine (Hardey et. al., 2009).
Dalkey Islands SPA [004172]	ca. 6.5km north-east	Conservation Objectives Generic Version 6.0 (21/02/18) Roseate Tern <i>Sterna dougallii</i> [A192] [passage] Common Tern <i>Sterna hirundo</i> [A193] [passage] Arctic Tern <i>Sterna paradisaea</i> [A194] [passage]	No. Whilst there is a linkage between the proposed development and the European site, there is no risk of disturbance to Special Conservation Interest bird species given the distance between the proposed development and the European site.
North Bull Island SPA [004006]	ca. 10km north-east	Conservation Objectives Version 1.0 (09/03/15) Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] [wintering] Shelduck (<i>Tadorna tadorna</i>) [A048] [wintering] Teal (<i>Anas crecca</i>) [A052] [wintering] Pintail (<i>Anas acuta</i>) [A054] [wintering] Shoveler (<i>Anas clypeata</i>) [A056] [wintering] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] [wintering] Golden Plover (<i>Pluvialis apricaria</i>) [A140] [wintering] Grey Plover (<i>Pluvialis squatarola</i>) [A141] [wintering] Knot (<i>Calidris canutus</i>) [A143] [wintering]	No. Whilst there is a linkage between the proposed development and the European site, there is no risk of disturbance to Special Conservation Interest bird species given the distance between the proposed development and the European site.

Table 2 European Sites within 15km of the Proposed Development (information downloaded from www.npws.ie)

Site name and code	Distance from proposed development (approximate)	Reasons for designation ⁸ (*= Priority Habitat)	Potential for Significant Effects on European Site No sites are “Relevant” to the Proposed Development. (European sites are “Relevant” where a relevant source-pathway-receptor link ⁹ exists).
		Sanderling (<i>Calidris alba</i>) [A144] [wintering] Dunlin (<i>Calidris alpina</i>) [A149] [wintering] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] [wintering] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] [wintering] Curlew (<i>Numenius arquata</i>) [A160] [wintering] Redshank (<i>Tringa totanus</i>) [A162] [wintering] Turnstone (<i>Arenaria interpres</i>) [A169] [wintering] Black-headed Gull (<i>Croicocephalus ridibundus</i>) [A179] [wintering] Wetlands & Waterbirds [A999]	
Howth Head Coast SPA [004113]	ca. 14.6km north-east	Conservation Objectives Generic Version 6.0 (21/02/18) Kittiwake (<i>Rissa tridactyla</i>) [A188] [breeding]	No, due to the distance and the substantial marine open water buffer between the proposed development site and the European site.

Figure 1: European Sites within the vicinity of the Proposed Development



3 Conclusions of Screening Assessment Process

Following an examination, analysis and evaluation of the relevant information, including in particular, the nature of the proposed works and their potential relationship with European sites, as well as considering other plans and projects, and applying the precautionary principle, it is the professional opinion of the authors of this report that it is possible to rule out likely significant effects on all European sites. The judgement has been reached for the reasons outlined below.

This report has identified that a number of European sites lie within the potential zone of influence of the proposed development. However for the reasons outlined below none of these European sites are deemed to be at risk of likely significant effects from construction or operation of the proposed development.

Surface Water

There is a potential pathway between the proposed development site and downstream European sites via the local surface water network during the construction phase of the development. However, there is no possibility for significant effects on European sites for the following reasons:

- Any pollution event is likely to be short in duration (i.e. confined to storm events);
- The works will be short in duration (spanning a period of approximately 2 years); and,
- The distance between the subject lands and European sites means that it is extremely unlikely that sediments or pollutants from the proposed development will result in any discernible effects.

Foul Water

Foul water generated on site during operation will be treated at Shanganagh WWTP before being discharged into Killiney Bay. The proposed development will include an increase in loading of 408 P.E. to the Shanganagh WWTP, which currently operates below its capacity of 186,000 P.E. at 96,389 P.E. Any existing or proposed projects discharging to the plant have the potential to act cumulatively to reduce water quality in the Northwestern Irish Sea / Killiney Bay, affecting European sites therein. Shanganagh WWTP currently operates below capacity and no significant effects from discharge arising from the proposed development are predicted due to the following:

- Shanganagh WWTP was compliant with the ELV's set in the wastewater discharge licence;
- Discharge from Shanganagh WWTP does not have an observable negative impact on water quality;
- Discharge from Shanganagh WWTP does not have an observable negative impact on the Water Framework Directive Status; and,
- Discharges from Shanganagh WWTP are not considered to have an impact on the bathing waters of Killiney Beach.
- The Northwestern Irish Sea – Killiney Bay coastal waterbody is currently classified as '*Unpolluted*'.

For these reasons, it is the professional opinion of the authors of this report that the application for planning permission for the proposed development does not require an Appropriate Assessment.

However, the authors of this report acknowledge that it is for Dún Laoghaire-Rathdown County Council, as the competent authority, to carry out a screening for AA and to reach one of the following determinations:

- a) AA of the proposed development is required if it cannot be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites;
- b) AA of the proposed development is not required if it can be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites.

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