

# Dún Laoghaire Central Active Travel Improvements

Appropriate Assessment Screening

Dún Laoghaire-Rathdown County Council

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## Quality information

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# 1. Introduction

## 1.1 Background

AECOM Ltd. on behalf of Dún Laoghaire-Rathdown County Council (DLRCC) has been tasked with undertaking an options assessment for the emerging Dún Laoghaire-Rathdown (DLR) Central Active Travel Improvements scheme, along 2.8 km of roadway in Dún Laoghaire (hereafter the 'Proposed Scheme').

This Appropriate Assessment (AA) Screening report considers the potential effects of the Proposed Scheme on European sites, which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). It serves to 'screen' for likely significant effects on European sites from the Proposed Scheme, either alone or in-combination with other plans or projects, and in view of best scientific knowledge.

## 1.2 Description of the Proposed Scheme

The Proposed Scheme is located along 2.8 km of roadway in Dún Laoghaire, encompassing:

- Kill Avenue;
- Mounttown Road Lower;
- Mounttown Road Upper; and,
- Glenageary Road Upper between the junctions of Oliver Plunkett Road and the Glenageary Roundabout.

The Proposed Scheme aims to improve the current facilities along this busy cycling and walking route to provide an enhanced environment to cater for the increasing cycling and walking demand, and to provide improved connections to other key cycling routes. This will be achieved by providing a new cycle track along the above sections of existing road, and other improvements such as cycle protected junctions.

The Proposed Scheme is shown in Appendix A.

## 1.3 Legislative context

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, which is more commonly known as 'the Habitats Directive', requires Member States of the European Union (EU) to take measures to maintain or restore, at favourable conservation status, natural habitats and wild species of fauna and flora of Community interest. The provisions of the Habitats Directive require that Member States designate SACs for habitats listed in Annex I and for species listed in Annex II. Similarly, Directive 2009/147/EC on the conservation of wild birds (more commonly known as 'the Birds Directive') provides a framework for the conservation and management of wild birds. It also requires Member States to identify and classify SPAs for rare or vulnerable species listed in Annex I of the Birds Directive, as well as for all regularly occurring migratory species. Collectively, SACs and SPAs are known as 'European sites'.

Under Article 6(3) of the Habitats Directive, any plan or project which is not directly connected with or necessary to the management of a European site, but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, must be subject to an Appropriate Assessment (AA) of its implications for the SAC / SPA in view of the site's conservation objectives.

In Ireland, the requirements of Article 6(3) are transposed into national law through Part XAB of the Planning and Development Act 2000 (as amended) for planning matters, and by the European Communities (Birds and Natural Habitats) Regulations 2011 in relation to other relevant approvals / consents. The legislative provisions for AA Screening for planning applications are set out in Section 177U of the Planning and Development Act 2000 (as amended).

The competent authority, which is responsible for determining decisions regarding AA is the relevant consenting body for each plan or project, which in this case is DLRCC.

## 1.4 Overview of the Appropriate Assessment process

The process required by Articles 6(3) and 6(4) of the Habitats Directive is stepwise and must be followed in sequence.

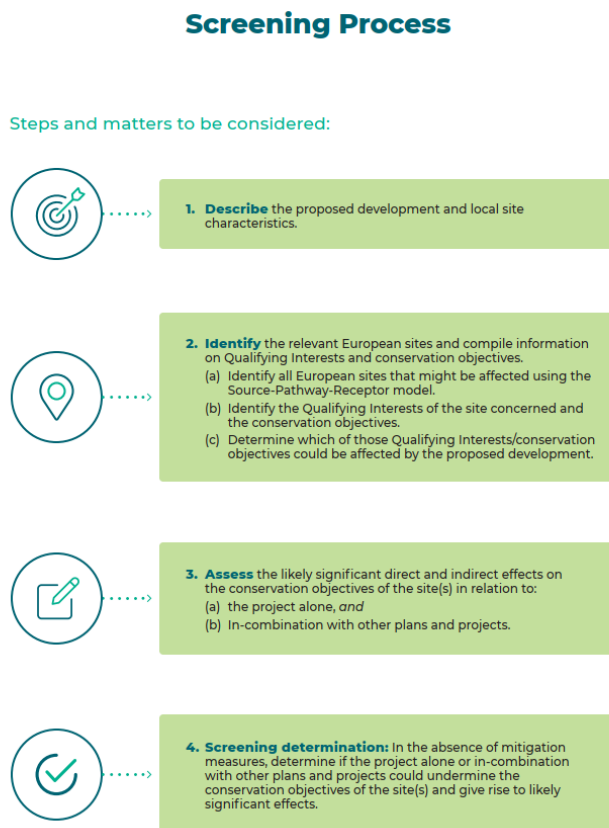
The first step in the sequence of tests is to establish whether an Appropriate Assessment (AA) is required. This is often referred to as 'AA Screening'. The purpose of AA Screening is to determine, in view of best available scientific knowledge, whether a plan or project, either alone or in combination with other plans or projects, could have likely significant effects on a European site, in view of that site's conservation objectives.

For this purpose and as a result of case law 'likely' means 'possible'. If the competent authority determines that there are no likely significant effects (including 'in combination' effects from other plans or projects), then no further assessment is necessary and the plan or project can, subject to any other issues, be taken forward. If, however, the competent authority determines that there are likely significant effects, or if there is reasonable scientific doubt, then the next step in the process must be initiated and a detailed AA be undertaken.

## 1.5 Sources of guidance

This AA Screening Report has been prepared in accordance with the European Commission (EC) guidance document Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2021). It also accords with the guidance provided in the Office of the Planning Regulator (OPR) document on Appropriate Assessment Screening for Development Management (OPR, 2021), and follows the structure and approach recommended, as shown on Image 1 below.

Image 1: The AA Screening process (taken from OPR 2021)



In addition, the following sources of guidance have also been used when carrying out this AA Screening exercise:

- Appropriate Assessment of Plans and Projects in Ireland (DoEHLG, 2010);
- Managing Natura 2000 Sites: the provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC (EC, 2018); and,
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular Letter NPWS 1/10 & PSSP 2/10 (NPWS, 2010).

## 1.6 Relevant case law

A series of rulings of the Court of Justice of the European Union (CJEU) are relevant and are considered throughout this document. These rulings and their implications for this AA Screening exercise are summarised in Table 1.

In addition, in a Judicial Review in Irish High Court in the case of Kelly v An Bord Pleanála & Anor (Eoin Kelly v. An Bord Pleanála [2019] IEHC 84), it was ruled that Sustainable Drainage Systems (SuDS) which form a part of the design of a development can be considered an integral part of the development and:

- are not measures that are intended to avoid or reduce the harmful effects of a particular development on a European site;
- are not intended to have that effect as they are required to comply with other relevant policies and legislation, including the Water Framework Directive and associated water quality Directives and Regulations; and,
- are not required to be incorporated by reason of the potential effect of a development on a European site.

The court concluded “*as a matter of fact and law, that SuDS are not mitigation measures which a competent authority is precluded from considering at the [AA] screening stage*”.

**Table 1: Case law relevant to the AA Screening of the Proposed Scheme**

Case	Ruling	Relevance to the AA Screening of the Proposed Scheme
People Over Wind and Sweetman v Coillte Teoranta (C-323/17)	The ruling of the CJEU in this case requires that any conclusion of 'no likely significant effect' on a European site must be made prior to any consideration of measures to avoid or reduce harm to the European site. The determination of likely significant effects should not, in the opinion of the CJEU, constitute an attempt at detailed technical analyses. This should be conducted as part of the AA.	It is necessary to distinguish between those measures which are intended to avoid or reduce harmful effects on a European site and those elements of a plan or project that may incidentally provide some degree of mitigation, but which are intrinsic or essential parts of the plan / project itself. If it can be concluded that the Proposed Scheme will have no adverse effect on any European site, in the absence of mitigation, it will be possible to conclude 'no likely significant effects', and the need for further detailed AA will be 'screened out'.
Waddenzee (C-127/02)	<p>The ruling in this case clarified that AA must be conducted using best scientific knowledge, and that there must be no reasonable scientific doubt in the conclusions drawn.</p> <p>The Waddenzee ruling also provided clarity on the definition of 'significant effect', which would be any effect from a plan or project which is likely to undermine the conservation objectives of any European site.</p>	<p>Adopting the precautionary principle, a 'likely' effect in this AA Screening is interpreted as one which is 'possible' and cannot be objectively ruled out.</p> <p>The test of significance of effects has been conducted with reference to the conservation objectives of relevant European sites.</p>
Holohan and Others v An Bord Pleanála (C-461/17)	<p>The conclusions of the Court in this case were that consideration must be given during AA to:</p> <ul style="list-style-type: none"><li>• effects on qualifying habitats and/or species of a SAC or SPA, even when occurring outside of the boundary of a European site, if these are relevant to the site meeting its conservation objectives; and,</li><li>• effects on non-qualifying habitats and/or species on which the qualifying habitats and/or species depend and which could result in adverse effects on the integrity of the European site.</li></ul>	This relates to the concept of 'functionally-linked habitat', i.e. areas outside of the boundary of a European site which supports its qualifying feature(s). In addition, consideration must be given to non-qualifying features upon which qualifying habitats and/or species rely.
T.C Briels and Others v Minister van Infrastructuur en Milieu (C-521/12)	The ruling of the CJEU in this case determined that compensatory measures cannot be used to support a conclusion of no adverse effect on site integrity.	Compensation can only be considered at the relevant stage of AA and not during AA. Compensation must be delivered when AA concludes that there will be adverse effects on site integrity.
Sweetman v An Bord Pleanála (C-258/11)	<p>The CJEU ruled that the protection afforded by the Habitats Directive applies once a Member State of the EU has notified a candidate European site.</p> <p>Furthermore, the court also concluded that where a plan or project will lead to the permanent loss of a priority habitat (i.e. one which is listed on Annex I of the Habitats Directive) and which is a qualifying feature of a European site, the view should be taken that such a plan or project will adversely affect the integrity of that site.</p>	<p>A candidate SAC / proposed SPA receives the same legal protection as a fully designated site and must be treated as such by HRA.</p> <p>The loss of even a very small area of priority habitat listed on Annex I of the Habitats Directive, where such habitat is a qualifying feature of an SAC, will almost certainly be considered to result in adverse effects on the integrity of that site.</p>



## 1.7 Purpose of this Report

Whilst the various steps involved in the AA process must be carried out by a competent authority, under Section 177U(3) of the Planning and Development Act 2000 (as amended), project proponents or their consultants may undertake a form of screening to establish if an AA is required and provide advice, or may submit the information necessary to allow the competent authority to conduct a screening of an application for consent. Specifically, Section 177U(3) states that *"in carrying out a screening for appropriate assessment of a Proposed Scheme a competent authority may request such information from the applicant as it may consider necessary to enable it to carry out that screening, and may consult with such persons as it considers appropriate..."*.

This AA Screening Report therefore serves to provide AECOM's opinion on the requirement for further AA, and to provide the information needed by DLRCC as the competent authority for the Proposed Scheme responsible for determining decisions regarding AA.

## 2. Methodology

### 2.1 Data sources

A desk-based study was carried out to establish the baseline conditions relevant to the Proposed Scheme. The following resources were analysed to inform the baseline description of the site of the Proposed Scheme and surrounding environment:

- Environmental Protection Agency (EPA) maps website (<https://gis.epa.ie/EPAMaps/>) (accessed April 2022);
- National Parks and Wildlife Service (NPWS) Protected Sites in Ireland website (<https://www.npws.ie/protected-sites>) (accessed April 2022);
- Google Maps website (<https://maps.google.com/>) (accessed April 2022); and,
- The Status of European Union (EU) Protected Habitats and Species in Ireland (Article 17 Report) (<https://www.npws.ie/publications/article-17-reports/article-17-reports-2019>) (accessed April 2022).

### 2.2 Establishing the zone of influence

When seeking to identify relevant European sites, consideration was given to identified impact pathways and the source-pathway-receptor approach (see OPR (2021)), rather than adopting a purely 'zones'-based approach. The source-pathway-receptor approach is a standard tool in environmental assessment. In order for an effect to occur, all three elements of this mechanism must be in place. The absence or removal of one of the elements of the mechanism means there is no likelihood for an effect to occur. Furthermore, even where an impact is predicted to occur, it may not result in significant effects.

Department of the Environment, Heritage and Local Government guidance (DoEHLG, 2010) states that European sites with the potential to be affected by a plan or project should be identified taking into consideration the potential for direct, indirect and/or cumulative (in-combination) effects. It also states that the specific approach in each case is likely to differ depending on the scale and likely effects of the plan or project. However, it advises that the following sites should generally be included:

- all European sites within or immediately adjacent to the plan or project area;
- all European sites within the likely 'zone of impact' of the plan or project; and,
- adopting the Precautionary Principle (UNESCO, 2005), all European sites for which there is doubt as to whether or not such sites might be significantly affected.

The likely zone of impact (also referred to as the likely 'zone of influence' (Zol)) of a plan or project is the geographic extent over which significant ecological effects are likely to occur. In the case of projects, the DoEHLG guidance acknowledges that the zone of influence must be devised on a case-by-case basis with reference to the following criteria: the nature, size / scale and location of the project, sensitivity of ecological features under consideration and cumulative effects.

The process of determining which (if any) European sites are within the Zol of the Proposed Scheme is a progressive process that effectively 'screens in' European sites if they considered to within the Zol of a particular effect. This has been carried out for each source type in a tabular manner in the initial part of the screening assessment, in Section 4 below.

## **3. Site and local baseline information**

### **3.1 Terrestrial habitats**

The Proposed Scheme lies entirely within built-up land comprising parts of the existing busy road network. It lies within central Dún Laoghaire amongst an extensive urban area that is predominantly commercial and residential, with areas of amenity grassland which are mainly fairly small. Two of these, Kill Avenue and Monkstown Castle on Mounttown Road Upper, are adjacent to the Proposed Scheme respectively. There are playing pitches 70 m north of Mounttown Road Upper also. All other areas of amenity grassland are at least 130 m away with intervening houses/gardens or other buildings, and sometimes other roads.

### **3.2 Water environment**

A review of the EPA interactive mapper for water quality data from 2013-2018 indicated that there are no waterbodies crossed by or immediately adjacent to the Proposed Scheme. The closest waterbody to the Proposed Scheme is the Monkstown Stream which appears to be culverted and is 365 m north-west. The next nearest is the Kill of the Grange Stream, which is 390 m west of the Proposed Scheme.

## 4. Screening assessment

### 4.1 Screening exercise

The screening exercise set out in Table 2 below initially considered all possible impact source types and their applicability to the Proposed Scheme. For applicable impact source types, it then considered whether a pathway for an effect on European sites exists and the nature of any effect (if any) on relevant receptors (comprising Qualifying Interests (QI), Special Conservation Interests (SCI) or the ecological features/processes supporting them for which an impact pathway exists). This effectively establishes the Zol of the Proposed Scheme for each impact source, and any European sites (if any) within the Zol are stated.

All stages of the Proposed Scheme have been considered. In this case, the construction and operational stages are relevant, but there is no expectation of a decommissioning stage which has therefore been excluded.

**Table 2: Impact sources, pathways, effects and resulting European sites within the potential Zol**

Impact source	Applicability to Proposed Scheme	Pathway to European site(s)	Potential for effect(s) on receptors*	European sites within potential Zol
<b>Construction phase</b>				
Direct loss of qualifying or supporting habitat(s)	None. The Proposed Scheme is not within or adjacent to European sites, and is confined to existing roads which do not constitute functionally-linked or supporting habitat for any SCI/QI species.	None	None.	None.
Waterborne pollution of qualifying or supporting habitat(s) or species.	Construction could produce pollution that could theoretically enter the water environment, although such pollution, if unmitigated, would not be major given the minor nature of the works in an urban area.	Very tenuous. The Proposed Scheme is in a serviced urban area and construction pollution, if unmitigated, would likely be captured and managed by the existing drainage system. The closest open waterbody to the Proposed Scheme (Monkstown Stream) is 365 m to the north-west, with the nearest part to the Proposed Scheme appearing to be culverted. Therefore the likelihood that pollution from the minor required works would reach this stream is very low, and although the stream discharges to Dublin Bay, it is culverted and there are intervening buildings/gardens etc. between the Proposed Scheme and the stream. The next nearest stream (Kill of the Grange Stream) is 390 m to the west, and although the western part of Kill Lane runs downhill towards it, the nearest part appears to be culverted. Therefore the likelihood that pollution from the minor required works would reach this stream is very low. Moreover this stream does not discharge into a European site directly but via non-designated open sea.	None. The minor works required for the Proposed Scheme would not produce major pollution. In the unlikely event that unmitigated pollution occurred, it would be minor and most likely captured and managed by the existing urban drainage system, and even if it did reach the nearest watercourses the great degree of dilution at the sea combined with the insignificant nature of any unmitigated construction pollution from such minor works indicates that there would be no effect.	None.
Airborne pollution of qualifying or supporting habitat(s) or species.	Construction would involve plant machinery/equipment therefore construction vehicle emissions would occur and dust generation is possible (although slight owing to the minor nature of the works).	No realistic pathway. The closest European sites to the Proposed Scheme (South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC) are over 680 m to the north, with an intervening highly urban area. Construction-generated dust and vehicular emissions would be minimal for the minor works required, and owing to dispersal would be insignificant at European sites with this degree of separation or greater.	None.	None.

Impact source	Applicability to Proposed Scheme	Pathway to European site(s)	Potential for effect(s) on receptors*	European sites within potential Zol
Hydrological changes (to surface waters or groundwater)	None. Construction does not require significant earthworks and will not abstract water, therefore there will be no effect on groundwater at European sites.	None. Further to the comments to the left, the nearest European sites comprise either marine habitat which is not vulnerable to terrestrial hydrological changes, or distant coastal areas with intervening sea and/or large urban areas such that hydrological changes would not be possible.	None.	None.
Changes to coastal processes	None. The Proposed Scheme is not located at the coast and provides no mechanism by which coastal processes could be distantly affected.	None.	None.	None.
Disturbance of SCI/QI or supporting species (e.g. visually or by noise, vibration or artificial light)	Disturbance of SCI birds is theoretically possible by the construction works.	The Proposed Scheme is not in a European site and does not constitute functionally-linked/supporting habitat for SCI/QI species, which would not occur there. The closest relevant European site (South Dublin Bay and River Tolka Estuary SPA) is more than 680 m to the north, beyond possible disturbance for SCI birds – the Proposed Scheme will involve minor works only, whereas even 'high level' disturbance (very noisy construction activities) are only likely to result in 'low level' disturbance beyond 500 m (Cutts <i>et al.</i> , 2013). However, parks/playing fields nearer the Proposed Scheme could constitute functionally-linked habitat for SCI birds such as curlew <i>Numenius arquata</i> .	None. At Mounttown Road Upper there is an area of amenity grassland at Monkstown Castle, and amenity playing pitches in a school 70 m from the road. There is also one small area with open amenity grass located beside the Proposed Scheme at Kill Avenue; others are at minimum 130 m away with intervening houses/gardens or other buildings. These could theoretically be used by SCI birds. However, given that a) the works for this Proposed Scheme will be minor, b) these roads are in central Dún Laoghaire and are subject to existing disturbance, and c) the amenity grassland/playing pitches at Mounttown Road Upper, and small amenity grassland area by Kill Avenue would also experience a high degree of disturbance by people, SCI birds would most likely not occur near the Proposed Scheme, and if they did they would be already habituated to significant disturbance and there are many alternative larger and likely less disturbed parks in the area. Therefore no effect is considered possible.	None.
Injury or mortality of QI/SCI or	None. The Proposed Scheme is confined to existing roads in a heavily built-up area which does not constitute functionally-linked habitat for	None.	None.	None.

Impact source	Applicability to Proposed Scheme	Pathway to European site(s)	Potential for effect(s) on receptors*	European sites within potential Zol
supporting species	SCI/QI or supporting species, therefore they will not occur at the Proposed Scheme and will not be injured.			
Barriers to or displacement of QI/SCI or supporting species	None. The Proposed Scheme does not affect waterbodies directly and provides no mechanism for affecting fish movements distantly, thus cannot affect fish migration. Neither does the Proposed Scheme provide any mechanism for affecting migration of other taxa such as birds.	None.	None.	None.
Changes to predator-prey dynamics	None. The Proposed Scheme provides no mechanism for affecting predator-prey dynamics (such as facilitated predation).	None.	None.	None.
Spread of invasive non-native species	Tenuously applicable. The Proposed Scheme is on existing well-maintained busy roads/paths in central Dún Laoghaire that themselves are highly unlikely to contain invasive species. Immediately adjacent gardens could contain such species.	None are realistic. The closest waterbody to the Proposed Scheme (Monkstown Stream) is 365 m north of the Proposed Scheme, therefore no spread of invasives by water is likely. The nearest European sites are all marine and not vulnerable to terrestrial invasive species. It is improbable that construction plant/vehicles would drive into terrestrial European sites at greater distances, and therefore improbable that invasives could be spread to them. Therefore no realistic pathway is considered to exist.	None.	None.
<b>Operational phase</b>				
Waterborne pollution of qualifying or supporting habitat(s) or species.	None. The Proposed Scheme does not change baseline operational drainage or water treatment.	None.	None.	None.
Airborne pollution of qualifying or supporting	The Proposed Scheme could slightly change operational vehicular emissions.	None. The Proposed Scheme could cause a reduction in vehicular emissions (it improves sustainable transport) but any such change would not be sufficient to be detectable at European sites, given the separation distances (minimum 680 m)	None.	None.

Impact source	Applicability to Proposed Scheme	Pathway to European site(s)	Potential for effect(s) on receptors*	European sites within potential Zol
habitat(s) or species.		and overall vehicular emissions from the wider nearby urban area (including Dublin). The nearer European sites are also marine and not vulnerable to such emissions.		
Hydrological changes (to surface waters or groundwater)	None. The Proposed Scheme is an urban road improvement providing no mechanism for affecting groundwater levels during operation.	None.	None.	None.
Changes to coastal processes	None. The Proposed Scheme is an urban road improvement not located at the coast and providing no mechanism by which coastal processes could be distantly affected.	None.	None.	None.
Disturbance of SCI/QI or supporting species (e.g. visually or by noise, vibration or artificial light)	None. European sites are too distant to be subject to disturbance, and regarding functionally-linked habitat that might be used by SCI birds, the Proposed Scheme will not result in significant change to baseline traffic/human disturbance from the roads concerned.	None.	None.	None.
Injury or mortality of QI/SCI or supporting species	None. As noted above, the Proposed Scheme involves minor alterations to existing roads which do not constitute functionally-linked habitat for QI/SCI or supporting species, therefore they will not occur there and will not be injured.	None.	None.	None.
Barriers to or displacement of QI/SCI or supporting species	None. The Proposed Scheme provides no mechanism for affecting migratory or other movements during operation.	None,	None,	None,
Changes to predator-prey dynamics	None. The Proposed Scheme is an urban road improvement providing no mechanism for affecting predator-prey dynamics (such as facilitated predation).	None,	None,	None,



Impact source	Applicability to Proposed Scheme	Pathway to European site(s)	Potential for effect(s) on receptors*	European sites within potential Zol
Spread of invasive non-native species	None. Operation of the Proposed Scheme provides no mechanism for spread of invasive non-native species.	None,	None,	None,

\* Receptors here means any Qualifying Interest(s) of SAC(s) or Special Conservation Interest(s) of SPA(s) or any other ecological features which support QI/SCI.

## 4.2 Test of likely significant effects

As set out in Table 2, for almost all impact sources there is no applicability to the Proposed Scheme or no pathway for an effect to be caused on any European sites, largely because the Proposed Scheme involves minor road improvements of existing busy roads within a heavily built-up area.

For pollution during construction, unmitigated pollution (in the unlikely event that this occurred) would be minor owing to the minor nature of the works, and would be managed by the existing urban drainage system. There is a very low risk of unmitigated construction pollution reaching the nearest watercourse (Monkstown Stream), which is 365 m to the north-west. However, the downstream European sites that could theoretically receive such pollution are marine, and the large degree of dilution by emerging major rivers, tidal flushing and the volume of sea itself, combined with the minor nature of any such pollution (in the unlikely event that it was unmitigated, and considering the minor nature of the works), indicate that there would be no effect.

For disturbance of SCI/QI species, it is noted in Table 2 that parks near the Proposed Scheme could be used as functionally-linked habitat by SCI birds such as curlew. At Mounttown Road Upper there is an area of amenity grassland at Monkstown Castle, and amenity playing pitches in a school 70 m from the road, and also one park (by Kill Avenue) next to the Proposed Scheme; others are at least 130 m away. Some parks are therefore within distance that disturbance of SCI birds using them could theoretically occur (Cutts *et al.*, 2013). However, it is critical that (except for the amenity areas adjacent to Mounttown Road Upper and Kill Avenue) they are separated from the Proposed Scheme by dense houses/gardens or other buildings, and often other roads as well, such that disturbance is highly improbable. Moreover, a) the Proposed Scheme involves only minor works to existing roads, b) the roads concerned are in central Dún Laoghaire and are busy causing existing disturbance, and c) the small areas of amenity grassland by Mounttown Road Upper and by Kill Avenue would experience a high degree of disturbance by people and is therefore not likely to be used by SCI birds, and if they did occur they would be habituated to high levels of existing disturbance and there are many alternative parks (many larger and likely less disturbed) in the area. Therefore no effect is considered possible on SCI birds.

Consequently, it is concluded that there will be no effects of any kind on European sites as a result of the Proposed Scheme.

## 4.3 In-combination effects

Cumulative effects can result from individually insignificant but collectively significant actions taking place over a period of time or concentrated in a location (CIEEM, 2019). Effects which arise in-combination with other projects or plans must be considered as part of AA Screening. In accordance with OPR (2021), the assessment of in-combination effects must examine:

- completed projects;
- projects which are approved but not completed;
- proposed projects (i.e. for which an application for approval or consent has been made, including refusals subject to appeal and not yet determined);
- proposals in adopted plans; and
- proposals in finalised draft plans formally published or submitted for consultation or adoption.

As discussed in Section 4.2, no effects are considered possible from the Proposed Scheme itself. Where there is no possibility of any effect (as opposed to a small but insignificant effect, or a significant effect), there cannot be any in-combination effect with other projects or plans as there will be no addition from the Proposed Scheme.

Consequently, it is concluded that there will be no effects on European sites from the Proposed Scheme in-combination with any other plans or projects.

## 5. Screening statement and conclusion

There is considered to be no possibility of effects from the Proposed Scheme itself on any European site, SCI/QI species or supporting habitat.

Consequently, the in-combination assessment also concludes that there is no potential for in-combination effects to arise with any other projects or plans.

Therefore, in view of best scientific knowledge and on the basis of objective information, it is concluded that the Proposed Scheme, whether individually or in combination with other plans or projects, beyond reasonable scientific doubt is not likely to have significant effects on any European site. Therefore, there is no requirement to proceed to the next step of Appropriate Assessment and, subject to other requirements, the Proposed Scheme can be authorised.

## 6. References

CIEEM (2019). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater Coastal and Marine. Version 1.1, Updated September 2019. Chartered Institute of Ecology and Environmental Management, Winchester.

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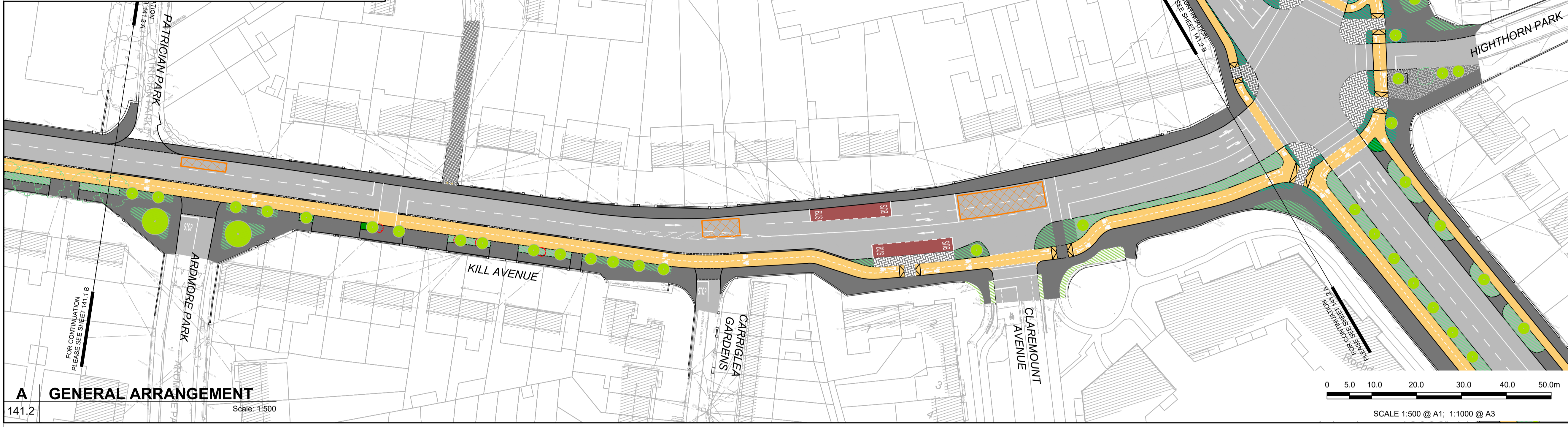
## Appendix A Figures



**LANDSCAPE LEGEND:**

	EXISTING TREE		GC1: GROUND COVER 1
	EXISTING TREE TO BE REMOVED		GC2: GROUND COVER 2
	PROPOSED STREET TREE		LAWN
	PROPOSED PARK TREE		EXISTING PLANTING TO BE RETAINED
	INCIDENTAL PLAY ZONE		PP: PUBLIC PATHWAY PAVING
	PLAYING FEATURES		PARK ENTRANCE PAVING 200mm X 100mm
	SM1: STREETSCAPE SHRUB MIX 1		FEATURE PAVING 200mm X 100mm
	SM2: STREETSCAPE SHRUB MIX 2		LANEWAY ENTRANCE PAVING
	PM1: PARK MIX 1 (ORNAMENTAL FLOWERS)		EXPOSED AGGREGATE CONCRETE
	PM2: PARK MIX 2 (WILDFLOWER)		SF: BOLLARD

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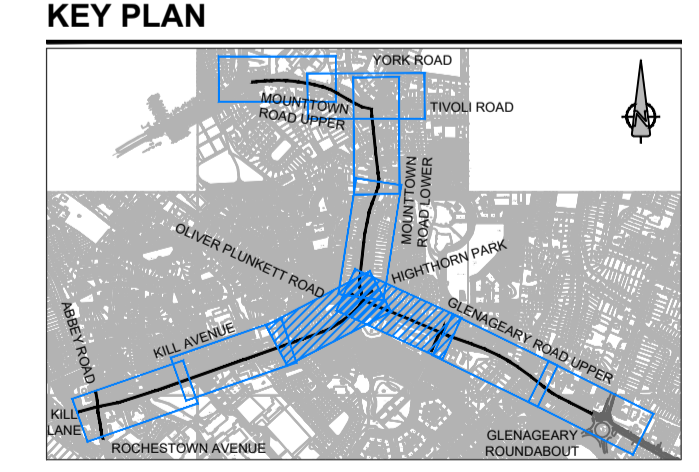
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**KEY:**

	CYCLE TRACK
	CARRIAGEWAY
	FOOTWAY / ISLAND
	SHARED PATH
	LANDSCAPED AREA
	BUS BAY
	BUS LANE

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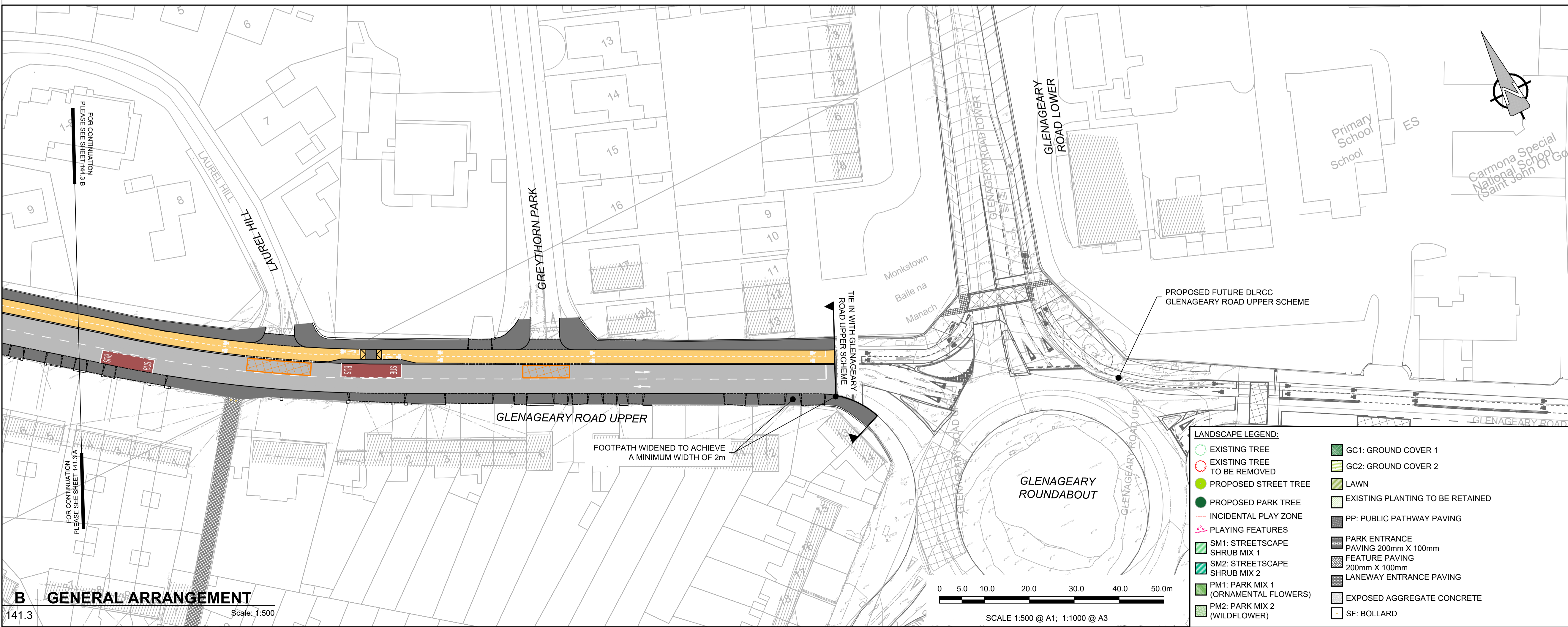
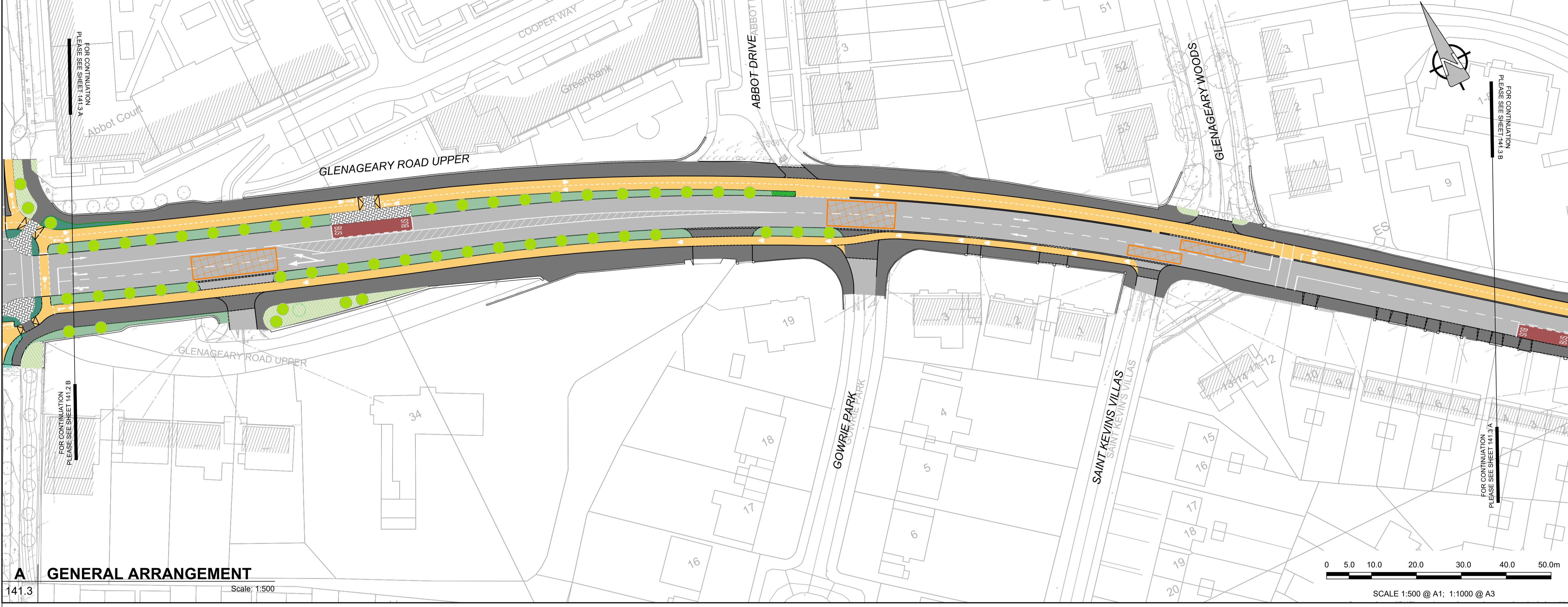


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**SHEET TITLE**  
 GENERAL ARRANGEMENT SHEET 2 OF 5

**SHEET NUMBER**  
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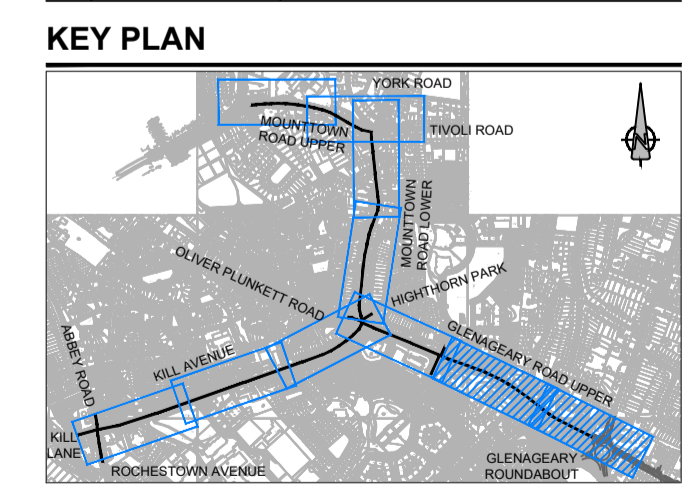
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- KEY:**
- CYCLE TRACK
  - CARRIAGEWAY
  - FOOTPATH / ISLAND
  - SHARED PATH
  - LANDSCAPED AREA
  - BUS BAY
  - BUS LANE

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GENERAL ARRANGEMENT  
SHEET 3 OF 5

**SHEET NUMBER**  
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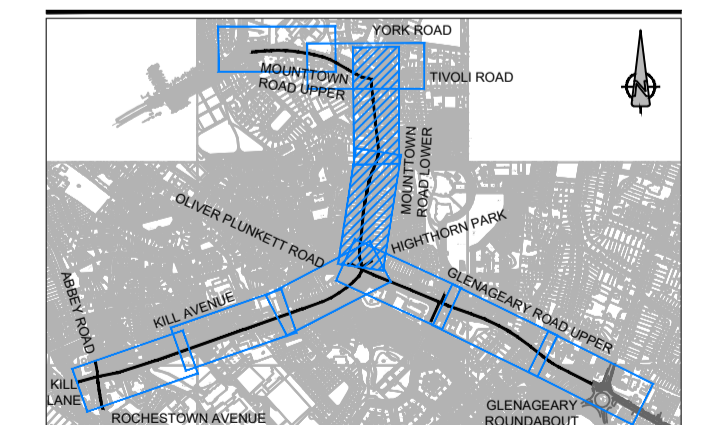
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- FOOTWAY / ISLAND
- SHARED PATH
- LANDSCAPED AREA
- BUS BAY
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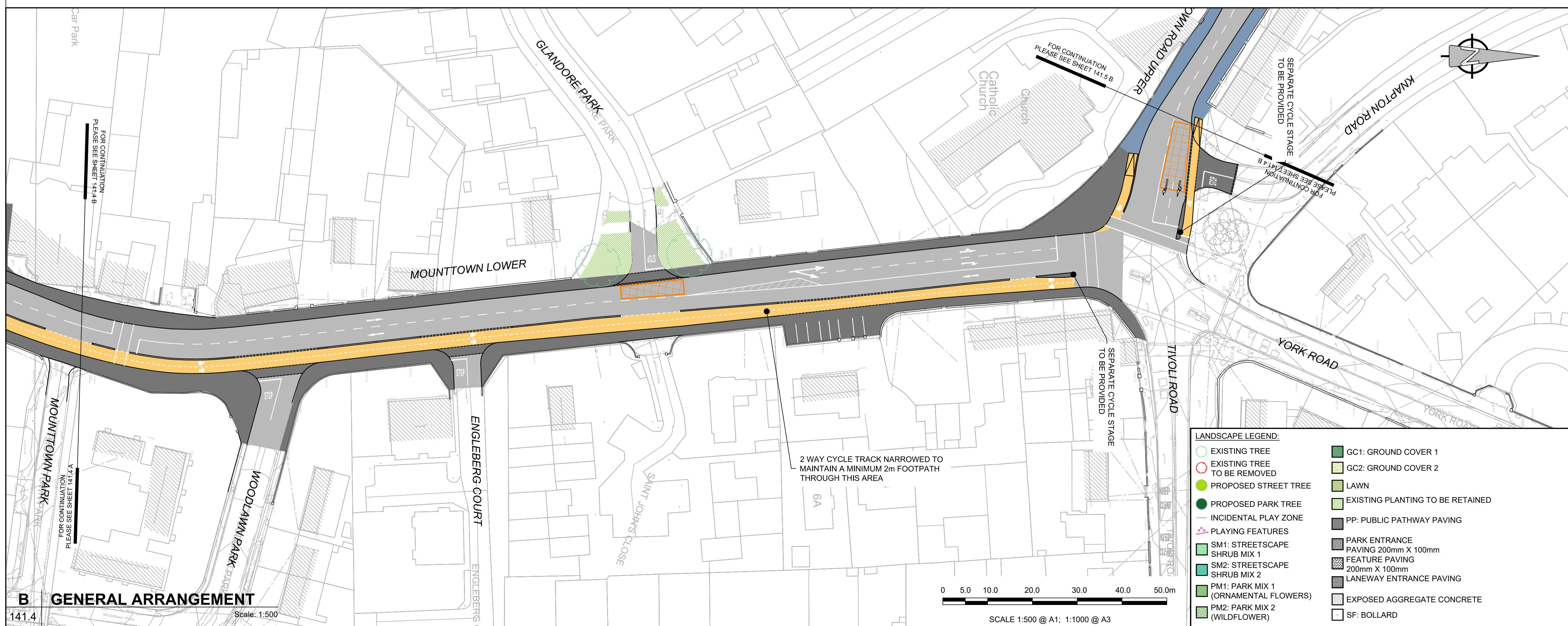
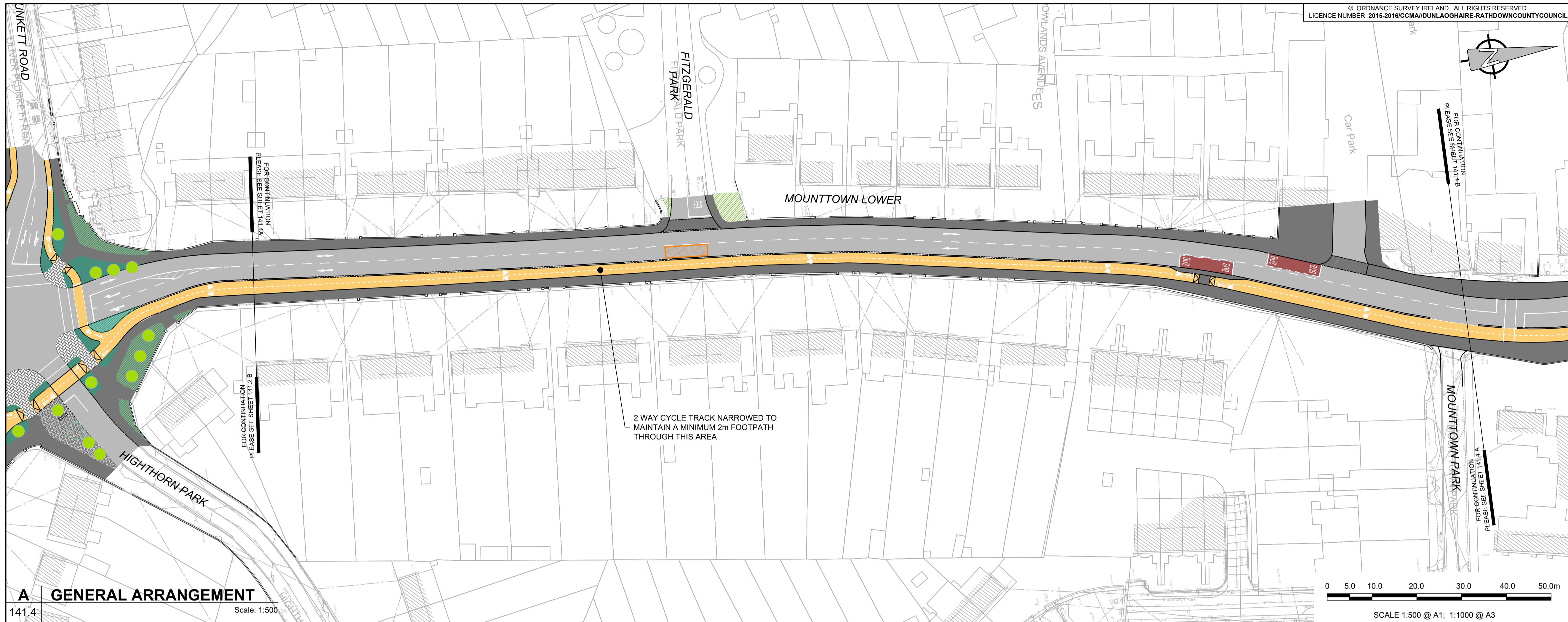
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GENERAL ARRANGEMENT  
 SHEET 4 OF 5

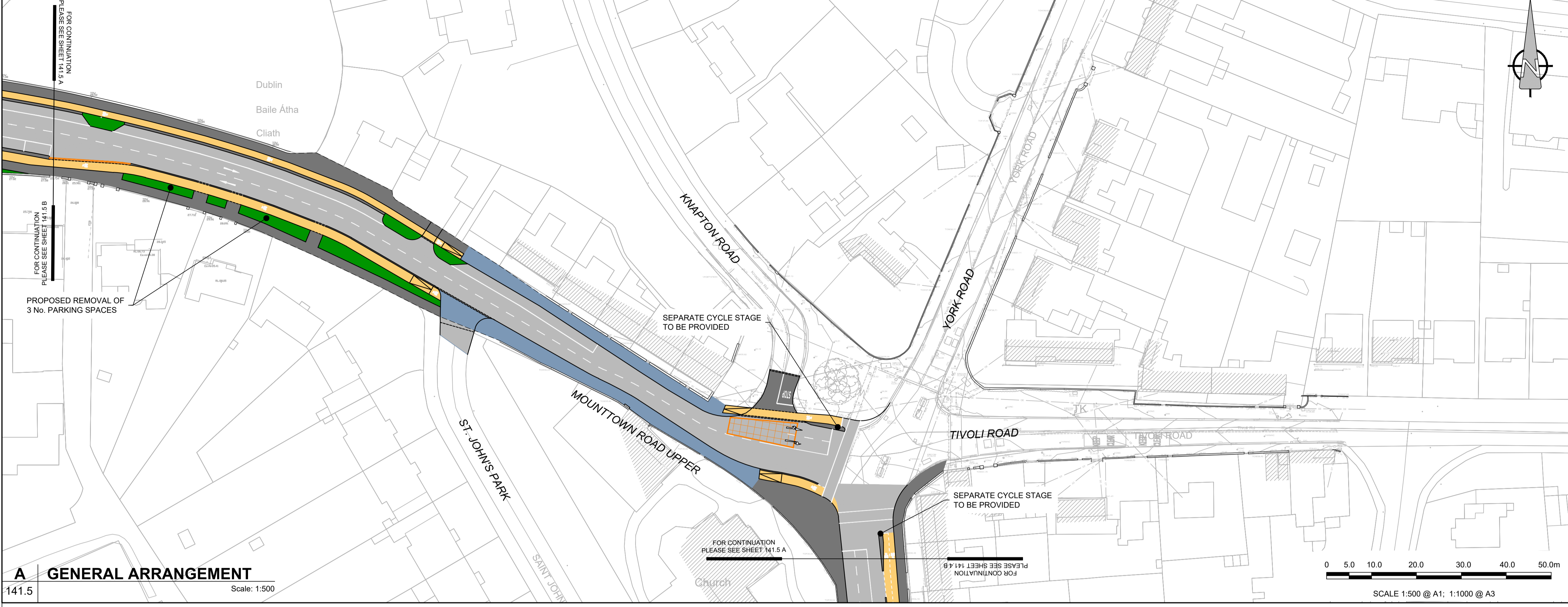
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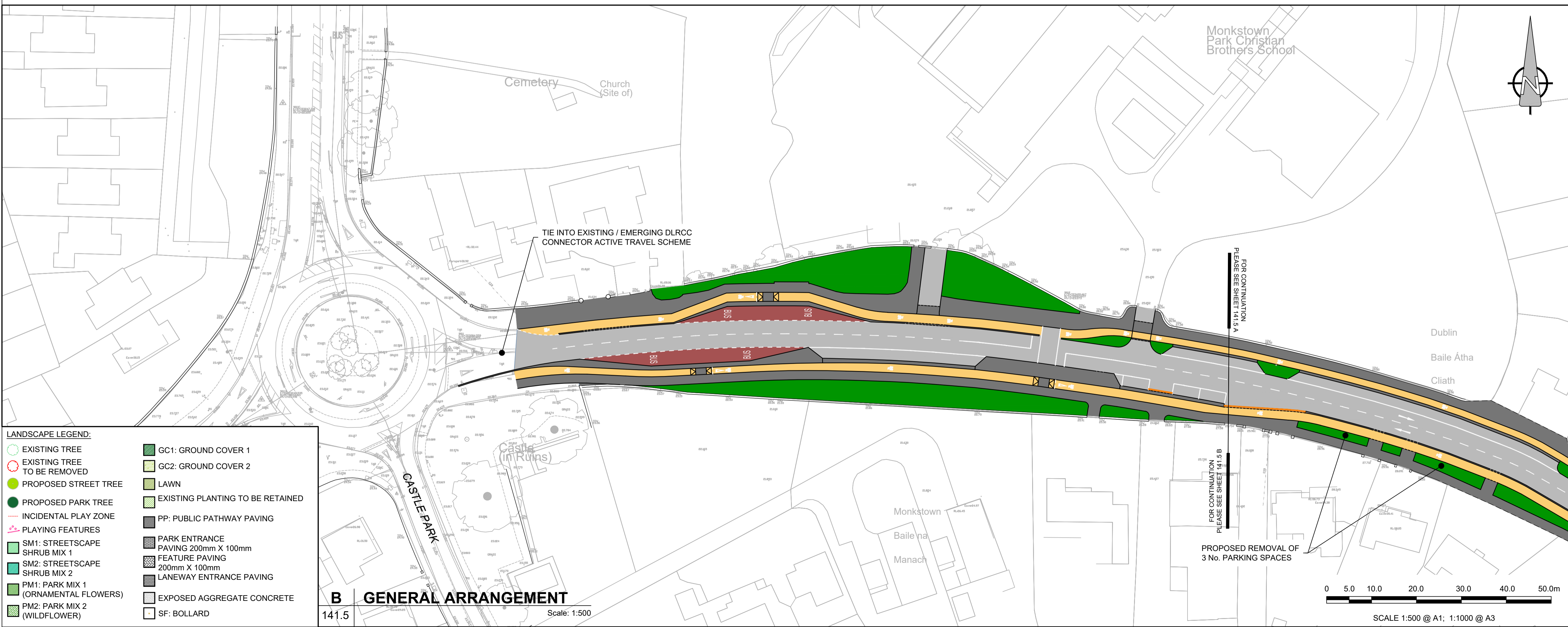


- LANDSCAPE LEGEND:**
- EXISTING TREE
  - EXISTING TREE TO BE REMOVED
  - PROPOSED STREET TREE
  - PROPOSED PARK TREE
  - INCIDENTAL PLAY ZONE
  - PLAYING FEATURES
  - SM1: STREETSCAPE SHRUB MIX 1
  - SM2: STREETSCAPE SHRUB MIX 2
  - PM1: PARK MIX 1 (ORNAMENTAL FLOWERS)
  - PM2: PARK MIX 2 (WILDFLOWER)
  - GC1: GROUND COVER 1
  - GC2: GROUND COVER 2
  - LAWN
  - EXISTING PLANTING TO BE RETAINED
  - PP: PUBLIC PATHWAY PAVING
  - PARK ENTRANCE PAVING 200mm X 100mm
  - FEATURE PAVING 200mm X 100mm
  - LANEWAY ENTRANCE PAVING
  - EXPOSED AGGREGATE CONCRETE
  - SF: BOLLARD

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**A GENERAL ARRANGEMENT**  
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**LANDSCAPE LEGEND:**

EXISTING TREE	GC1: GROUND COVER 1
EXISTING TREE TO BE REMOVED	GC2: GROUND COVER 2
PROPOSED STREET TREE	LAWN
PROPOSED PARK TREE	EXISTING PLANTING TO BE RETAINED
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PM1: PARK MIX 1 (ORNAMENTAL FLOWERS)	EXPOSED AGGREGATE CONCRETE
PM2: PARK MIX 2 (WILDFLOWER)	SF: BOLLARD

**B GENERAL ARRANGEMENT**  
141.5 Scale: 1:500



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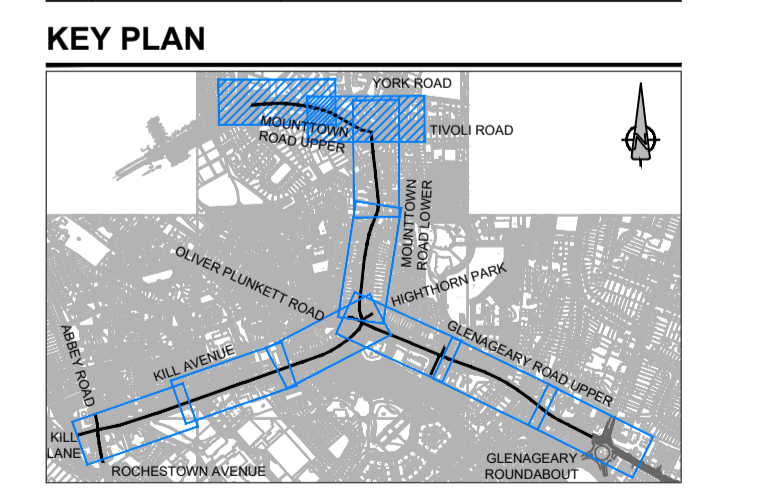
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