

STATEMENT OF SCREENING FOR APPROPRIATE ASSESSMENT

OF A PROPOSED DEVELOPMENT

AT NO. 9 GEORGES PLACE & WASH HOUSE,

KELLYS AVENUE, DÚN LAOGHAIRE CO. DUBLIN

FOR DÚN LAOGHAIRE-RATHDOWN COUNTY COUNCIL

In Line with the Requirements of Article 6(3) of the EU Habitats Directive



Prepared for

Dún Laoghaire-Rathdown County Council

Prepared by

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This report refers, within the limitations stated, to the condition of the site at the time of the report. No warranty is given as to the possibility of future changes in the condition of the site. The report as presented is based on the information sources as detailed in this report, and hence maybe subject to review in the future if more information is obtained or scientific understanding changes.

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1.0 INTRODUCTION

1.1 Background

This report for the purposes of Appropriate Assessment (AA) Screening has been prepared to support a Planning Application for the Proposed Development (described in Section 3 below). This report contains information required for the competent authority to undertake screening for Appropriate Assessment (AA) in respect of the construction of a development at No. 9 Georges Place and Wash House, Kellys Avenue, Dún Laoghaire Co. Dublin, (hereafter referred to as the Proposed Development) to determine whether it is likely individually or in combination with other plans and projects to have a significant effect on any European sites, in light of best scientific knowledge.

Having regard to the provisions of the Planning and Development Act 2000 as amended (the "Planning Acts") (section 177U), the purpose of a screening exercise under section 177U of the PDA 2000 is to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on a European site.

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 have a significant effect on a European site then it is necessary to carry out a Stage 2 appropriate assessment under section 177V of the Planning Acts.

When screening the project, there are two possible outcomes:

- the project poses no potential for a likely significant effect and as such requires no further assessment.
- the project has potential to have likely significant effect (or this is uncertain) unless mitigation measures are applied, and therefore an AA of the project is necessary.

1.2. Legislative Background - The Habitats and Birds Directives

Article 6 of the Habitats Directive is transposed into Irish Law inter alia by the Part XAB of the Planning Acts (section 177U and 177V) govern the requirement to carry out appropriate assessment screening and appropriate assessment, where required, per Section 1.1 above.

The Habitats Directive (Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora) is the main legislative instrument for the protection and conservation of biodiversity in the European Union (EU). Under the Habitats Directive, Member States are obliged to designate Special Areas of Conservation (SACs) which contain habitats or species considered important for protection and conservation in an EU context.

The Birds Directive (Council Directive 2009/147/EC on the conservation of wild birds), transposed into Irish law by the Bird and Natural Habitats Regulations 2011, as amended, is concerned with the long-term protection and management of all wild bird species and their habitats in the EU. Among other things, the Birds Directive requires that Special Protection Areas (SPAs) be established to protect migratory species and species which are rare, vulnerable, in danger of extinction, or otherwise require special attention.

SACs designated under the Habitats Directive and SPAs, designated under the Birds Directive, form a pan-European network of protected sites known as Natura 2000. The Habitats Directive sets out a unified system for the protection and management of SACs and SPAs. These sites are also referred to as European sites.

Articles 6(3) and 6(4) of the Habitats Directive set out the requirement for an assessment of proposed plans and projects likely to have a significant effect on Natura 2000 sites.

Article 6(3) establishes the requirement to screen all plans and projects and to carry out an appropriate assessment if required (Appropriate Assessment (AA)). Article 6(4) establishes requirements in cases of imperative reasons of overriding public interest:

Article 6(3): "Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives. Considering the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

1.3 Statement of Competency

This AA Screening report was carried out by Noreen McLoughlin, BA, MSc, MCIEEM and Nevin Traynor Environmental Scientist BSc Env. Nevin has an honours degree in Environmental Science from Sligo IT. Nevin has over 25 years' experience as an Environmental Consultant in Ireland. Noreen has an honours degree in Zoology and an MSc in Freshwater Ecology from Trinity College, Dublin and she has been a full member of the Chartered Institute of Ecology and Environmental Management for over 15 years. Noreen has over 17 years' experience as a professional ecologist in Ireland.

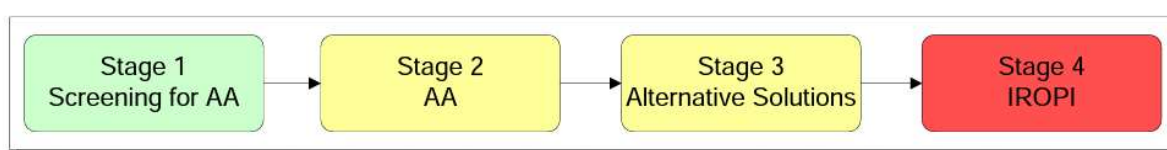
2.0 METHODOLOGY

The Commission's methodological guidance (EC, 2002, 2018, 2021 see Section 2.1 below) promotes a four-stage process to complete the AA and outlines the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. Stages 1 and 2 deal with the main requirements for assessment under Article 6(3). Stage 3 may be part of Article 6(3) or may be a necessary precursor to Stage 4. Stage 4 is the main derogation step of Article 6(4).

2.1 Stages of Appropriate Assessment

The AA process is a four-stage process. Each stage requires different considerations, assessments, and tests to ultimately arrive at the relevant conclusion for each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required (See Figure 1).

Figure 1. Overview of Screening and Appropriate Assessment (OPR, 2021).



The four stages of an AA can be summarised as follows:

- **Stage 1: Screening.** The first stage of the AA process is to determine the likelihood of significant effects of the Proposed Development, this address:
 - whether a plan or project is directly connected to or necessary for the management of the site, or
 - Whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.
- **Stage 2: Appropriate Assessment.** The second stage of the AA requires the competent authority to determine whether the project or plan (either alone or in combination with other projects or plans) will have an adverse effect on the integrity of the European site, having regard to the conservation objectives of the site and its ecological structure and function. (Figure 1). The applicant must provide a Natura Impact Statement (NIS) to the competent authority to inform the AA, which is a statement, for the purposes of Article 6 of the Habitats Directive of the implications of a proposed development, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites. It must include a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications for one or more than one European site in view of the conservation objectives of the site or sites. The competent authority must consult with the public in relation to any plan or project that requires AA. If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site, it can only grant consent after proceeding through stages 3 and 4.
- **Stage 3: Assessment of alternative solutions.** If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.
- **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.** The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

To ensure that the Proposed Development complies fully with the requirements of Article 6 of the Habitats Directive and all relevant Irish transposing legislation, Traynor Environmental Ltd compiled this report to enable Dún Laoghaire-Rathdown County Council to carry out AA screening in relation to the Proposed Development to determine whether the Proposed Development, individually or in combination with another plan or project will have a significant effect on a Natura 2000 site.

2.2 Guidance

This report has been compiled in accordance with guidance contained in the following documents:

- 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 NPWS 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 Guidance Document.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC Environment Directorate-General, 2000); hereafter referred to as MN2000.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC, 2018).
- Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (EC, 2021).
- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC, 2021).
- Office of the Planning Regulator (OPR) Practice Note PN01 Appropriate Assessment Screening for Development Management (OPR, 2021).

2.3 Data Sources

Sources of information that were used to collect data on the Natura 2000 network of sites, and the environment within which they are located, are listed below:

- The following mapping and Geographical Information Systems (GIS) data sources, as required:
 - National Parks & Wildlife (NPWS) protected site boundary data.
 - Ordnance Survey of Ireland (OSI) mapping and aerial photography.
 - OSI/Environmental Protection Agency (EPA) rivers and streams, and catchments.
 - Open Street Maps.
 - Google Earth and Bing aerial photography 1995-2024.
- Online data available on Natura 2000 sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie including:
 - Natura 2000 - Standard Data Form.
 - Conservation Objectives.
 - Site Synopses.
- National Biodiversity Data Centre records.
 - Online database of rare, threatened, and protected species.
 - Publicly accessible biodiversity datasets.
- Status of EU Protected Habitats in Ireland. (National Parks & Wildlife Service, 2019); and
- Relevant Development Plans.
 - Dún Laoghaire-Rathdown Development Plan 2022-2028

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Proposed Development will consist of the following:

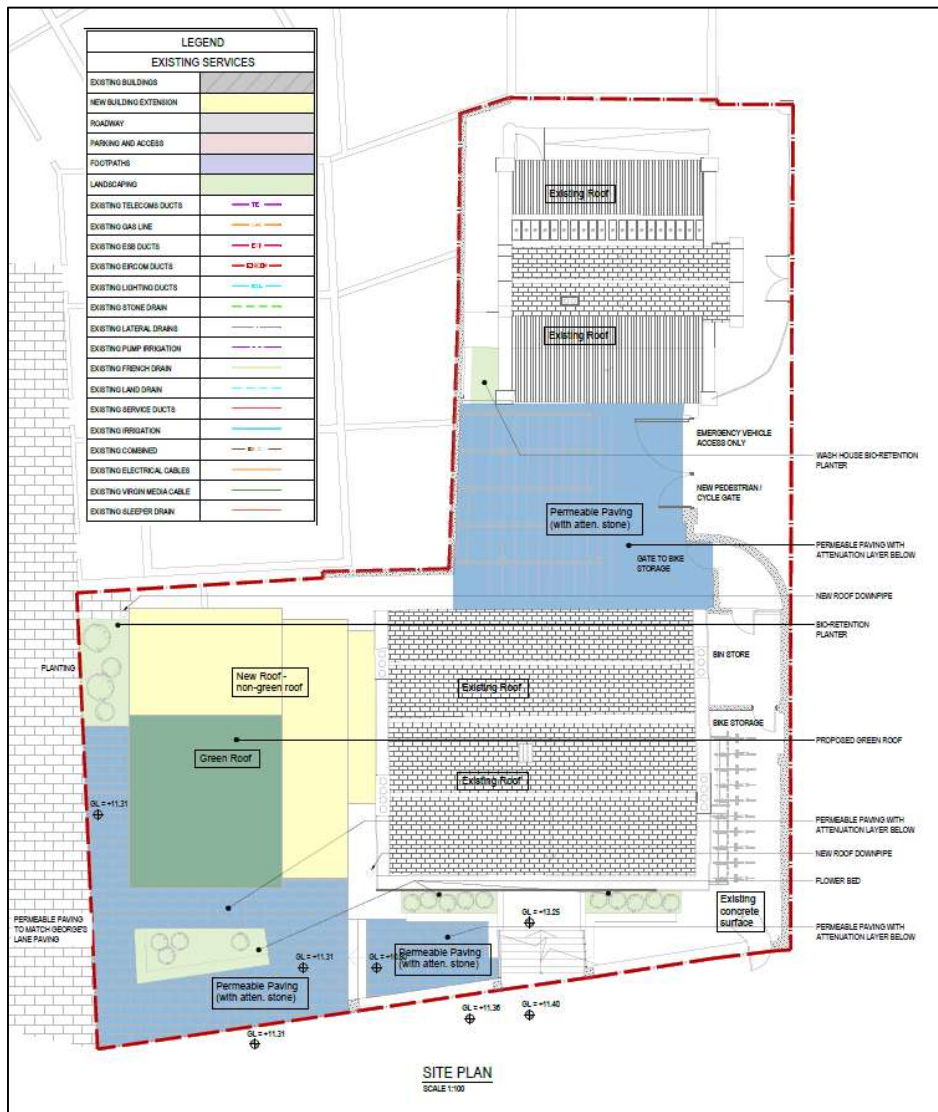
The proposed development comprises of:

- Full retrofit and refurbishment of no. 9 George's Place (Floor Area: 484 sqm) to accommodate new use as a creative hub with studio spaces, teaching rooms, multi-purpose rooms / meeting rooms and associated social spaces.
- Full thermal efficiency upgrading to best conservation practice.
- Demolition of existing two-storey lean to extension to no. 9 George's Place which is structurally unsound and in very poor condition (Floor area: approx. 83 sqm).
- Construction of new four-storey extension to replace existing lean-to extension to provide universal access to all levels on no. 9 George's place, to provide new multi-purpose studios and meeting rooms for the creative hub and to provide a viewing terrace at upper level. (11.8 x 9m footprint approx. 315 sqm extension).
- Ground Floor (semi-basement level of no. 9 George's Place) of extension: 95sqm containing double height entrance foyer at street level to provide universal access, lift & stair core providing access to semi-basement level of no. 9 George's Place, multipurpose room and changing places w.c.
- First floor extension: 92 sqm containing lift & stair core, multipurpose room and glazed link to no. 9 George's Place.
- Second floor extension: 92 sqm containing lift & stair core, multipurpose room, office and glazed link to no. 9 George's Place.
- Third floor of extension: 36 sqm containing lift & stair core, terrace (17 sqm) to the rear accessed from the corridor, multipurpose room with small terrace (11sqm) to the front.
- Full retrofit and refurbishment of former Wash House, Kelly's Avenue (Floor Area: 161 sqm) to include revised internal layout to accommodate new use and full thermal efficiency upgrading to best conservation practice.
- Insertion of internal platform lift in Wash House for Universal Access.
- The external courtyard between the two buildings will be retained to facilitate access and circulation between the two buildings. It will be landscaped with a pergola overhead to enhance the circulation route between the two buildings. (Courtyard 10.6m x 10m: 106 sqm)
- External enhancement to the surrounding perimeter area and enhancement of the boundaries of the site.
- The future use of the building is currently being determined through public consultation and the preparation of the Integrated Urban Study with funding from THRIVE (Town Centre First Enhancement Scheme). It will be a non-residential educational / creative hub. Probable uses include a Centre for Digital Creative Practices with educational spaces and creative studios / exhibition space / music education / teaching spaces / creative hub.

Figure 1: Site Location Map



Figure 2: Site Layout plan



3.1 Site Location and Surrounding Environment

A site walkover was carried out by the project lead Nevin Traynor and facilitated by Noreen Mc Loughlin from Traynor Environmental Ltd on January 22nd 2025, when any habitats of biodiversity value within the site were noted.

The application site is 0.07ha and it encompasses two separate buildings at No.9 Georges Place and Wash House, Kellys Ave in Dún Laoghaire. The application site is bounded to the east by Kelly's Ave, to the south by George's Place, to the west by George's Lane and to the north by a residential area.

The site is located in an urban environment and the main habitats represented locally include buildings and artificial surfaces (mostly residential and commercial areas, along with roads and car parks), amenity gardens and grasslands, and scattered trees and parkland. The marine and coastal habitats of Dún Laoghaire Harbour are approximately 180m north of the site.

Site location maps can be seen in Figures 2 , whilst an aerial photograph of the lands surrounding the application site is presented in Figure 3.

Figure 3 – Site Layout Aerial (Site Outlined in Red)



3.2 Habitats within the Site

No part of the site lies within any area that is designated for nature conservation purposes. All proposed development works within the application site will take place in an urban environment on areas of low biodiversity value.

The site is largely devoid of vegetation, with the exception of ruderal and opportunistic plants that are growing along the bottoms of the existing walls and through cracks in the existing concrete. The dominant habitat within the site is Buildings and Artificial Surfaces (BL3).

There are no habitats of biodiversity value within the site.

3.3 Water Framework Directive

In response to the increasing threat of pollution and the increasing demand from the public for cleaner rivers, lakes and beaches, the EU developed the Water Framework Directive (WFD). This Directive is unique in that, for the first time, it establishes a framework for the protection of all waters including rivers, lakes, estuaries, coastal waters and groundwater, and their dependent wildlife/habitats under one piece of environmental legislation for all European member states.

The WFD (Directive 2000/60/EC) is a substantial piece of EU water legislation that came into force in 2000. The overarching objective of the WFD is for the water bodies in Europe to attain Good or High Ecological Status.

The Environment Protection Agency (EPA) is the competent authority in Ireland responsible for delivering the WFD. River Basin Management Plans (RBMP) have been created which set out measures to ensure that water bodies in the country achieve 'Good Ecological Status'.

Good Ecological Quality will depend on the quality of the individual quality elements on which the Ecological status is scored; namely the biological, chemical and morphological condition in a particular water body. Any reduction in any of these elements will result in a reduction of the overall ecological status.

3.3.1 Water Framework Status and Objectives

It is understood that Draft River Basin Management Plan for Ireland (2022-2027) has been adopted by all local authorities in order to achieve the aims of the WFD. The Plan sets out the new approach that Ireland will take to enhance protection, prevention, and monitoring of Irish waterbodies. The main actions include:

- Improve wastewater treatment.
- Conservation and leakage reduction.
- Scientific assessment of water bodies and implementation of local measures.
- A new collaborative Sustainability and Advisory Support Programme.
- Dairy Sustainability Initiative.
- Development of water and planning guidance for local authorities.
- Extension of Domestic Wastewater Treatment Systems grant Schemes; and
- A new Community Water Development Fund

Regardless of their current quality, surface waters should be treated the same in terms of the level of protection and mitigation measures employed, i.e., there should be no negative change in status. The third and current cycle aims to build particularly on the initiatives of the second cycle, particularly the governance and implementation structures, and to improve the establishment of Irish Water, An Fóram Uisce (The Water Forum), the Local Authority Waters Programme and the Agricultural Sustainability Support and Advisory Programme.

3.3.2 Water Features and Quality

The application site lies within the Liffey and Dublin Bay Hydrometric Area (09) and Catchment (09), the Dodder Sub-Catchment (010) and the Brewery Stream Sub-Basin (010). There are no watercourses within or adjacent to the application site. The closest water feature to the site is Dún Laoghaire harbour itself and the open water habitats of the harbour are 180m north of the application site. There is no hydrological connectivity between the application site and Dún Laoghaire Harbour or any other water feature.

The EPA have classified the ecological status of the Dublin Bay at Dún Laoghaire as good. Under the requirements of the Water Framework Directive, this is satisfactory and this status must be maintained. All watercourses are obliged to meet good ecological status within the timeframe set out in this directive.

The site is within the Kilcullen Groundwater Body and the current status of this is noted to be good. Groundwater vulnerability throughout the site is noted to be high.

3.4 Protected Species

A winter survey of the potential of the buildings for use by bats was undertaken by Dr Tina Aughney in January 2025. It was considered that both buildings on site are of low value to bats. Nonetheless, two dusk surveys and possibly a dawn survey will be necessary to provide accurate information on the potential bat usage of the buildings during the bat activity season (May to August).

4.0 Identification of Natura 2000 Sites

4.1 Description of Natura Sites Potentially Significantly Affected

In accordance with the guidelines issued by the Department of the Environment and Local Government, a list of Natura 2000 sites within 15km of the proposed development have been identified and described according to their site synopsis, qualifying interests, and conservation objectives. In addition, any other sites further than this, but potentially within its zone of interest were also considered. The zone of impact may be determined by an assessment of the connectivity between the application site and the designated areas by virtue of hydrological connectivity, atmospheric emissions, flight paths, ecological corridors etc.

For significant effects to arise, there must be a potential impact facilitated by having a *source*, i.e., the proposed development and activities arising out of its construction or operation, a *receptor*, i.e., the European site and its qualifying interests and a subsequent *pathway* or *connectivity* between the source and receptor, e.g., a water course.

The likelihood for significant effects on the European site will largely depend on the characteristics of the source (e.g., nature and scale of the construction works), the characteristics of the existing pathway and the characteristics of the receptor, e.g., the sensitivities of the Qualifying Interests (habitats or species) to changes in water quality.

The National Parks and Wildlife Service website indicates that there is 18 presence of Natura 2000 designated sites within 15km of the proposed development. These designated areas and their closest points to the application site are summarised in Table 1 and a map showing their locations relative to the application site is shown in Figure 4. A full description of all these sites can be read on the website of the National Parks and Wildlife Service (npws.ie).

4.2 Ecological Network Supporting Natura 2000 Sites

A concurrent GIS analysis of the proposed Natural Heritage Areas (pNHA) and designated Natural Heritage Areas (NHA) in terms of their role in supporting the species using Natura 2000 sites was undertaken along with GIS investigation of European sites. It was assumed that these supporting roles mainly related to mobile fauna such as mammals and birds which may use pNHAs and NHAs as "stepping stones" between Natura 2000 sites.

Article 10 of the Habitats Directive and the Habitats Regulations 2011 place a high degree of importance on such non-Natura 2000 areas as features that connect the Natura 2000 network. Features such as ponds, woodlands and important hedgerows were considered during the preparation of this AA Screening report.

Table 2 – Natura 2000 Sites Within 25km of the Proposed Site

Site Name & Code	Distance from Site	Qualifying Interests	Screened In / Out
South Dublin Bay and River Tolka Estuary SPA 004024	455m north-west	<ul style="list-style-type: none"> • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) • Oystercatcher (<i>Haematopus ostralegus</i>) • Ringed Plover (<i>Charadrius hiaticula</i>) • Grey Plover (<i>Pluvialis squatarola</i>) • Knot (<i>Calidris canutus</i>) • Sanderling (<i>Calidris alba</i>) • Dunlin (<i>Calidris alpina</i>) • Bar-tailed Godwit (<i>Limosa lapponica</i>) • Redshank (<i>Tringa totanus</i>) • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) • Roseate Tern (<i>Sterna dougallii</i>) • Common Tern (<i>Sterna hirundo</i>) • Arctic Tern (<i>Sterna paradisaea</i>) • Wetland and Waterbirds 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during construction or operation can be ruled out.</p> <p>The site does not support sufficient or suitable habitat that could be used by the QIs of this SPA (especially brent geese) and significant effects upon these species will not arise.</p>
South Dublin Bay SAC 000210	910m west	<ul style="list-style-type: none"> • Mudflats and sandflats not covered by seawater at low tide • Annual vegetation of drift lines • Salicornia and other annuals colonising mud and sand • Embryonic shifting dunes 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Rockabill to Dalkey Island SAC 003000	3.2km east	<ul style="list-style-type: none"> • Reefs • <i>Phocoena phocoena</i> (Harbour Porpoise) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Dalkey Island SPA 004172	3.4km south-east	<ul style="list-style-type: none"> • Roseate Tern (<i>Sterna dougallii</i>) • Common Tern (<i>Sterna hirundo</i>) • Arctic Tern (<i>Sterna paradisaea</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed</p>

			<p>works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>
North-West Irish Sea SPA 004236	5.6km north	<ul style="list-style-type: none"> • Red-throated Diver(<i>Gavia stellata</i>) • Great Northern Diver(<i>Gavia immer</i>) • Fulmar(<i>Fulmarus glacialis</i>) • Manx Shearwater(<i>Puffinus puffinus</i>) • Cormorant(<i>Phalacrocorax carbo</i>) • Shag(<i>Phalacrocorax aristotelis</i>) • Common Scoter(<i>Melanitta nigra</i>) • Little Gull(<i>Larus minutus</i>) • Black-headed Gull(<i>Chroicocephalus ridibundus</i>) • Common Gull(<i>Larus canus</i>) • Lesser Black-backed Gull(<i>Larus fuscus</i>) • Herring Gull(<i>Larus argentatus</i>) • Great Black-backed Gull(<i>Larus marinus</i>) • Kittiwake(<i>Rissa tridactyla</i>) • Roseate Tern(<i>Sterna dougallii</i>) • Common Tern(<i>Sterna hirundo</i>) • Arctic Tern(<i>Sterna paradisaea</i>) • Little Tern(<i>Sterna albifrons</i>) • Guillemot(<i>Uria aalge</i>) • Razorbill(<i>Alca torda</i>) • Puffin(<i>Fratercula arctica</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>
North Bull Island SPA 004006	5.6km north	<ul style="list-style-type: none"> • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) • Shelduck (<i>Tadorna tadorna</i>) • Teal (<i>Anas crecca</i>) • Pintail (<i>Anas acuta</i>) • Shoveler (<i>Anas clypeata</i>) • Oystercatcher (<i>Haematopus ostralegus</i>) • Golden Plover (<i>Pluvialis apricaria</i>) • Grey Plover (<i>Pluvialis squatarola</i>) • Knot (<i>Calidris canutus</i>) • Sanderling (<i>Calidris alba</i>) • Dunlin (<i>Calidris alpina</i>) • Black-tailed Godwit (<i>Limosa limosa</i>) • Bar-tailed Godwit (<i>Limosa lapponica</i>) • Curlew (<i>Numenius arquata</i>) • Redshank (<i>Tringa totanus</i>) • Turnstone (<i>Arenaria interpres</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>

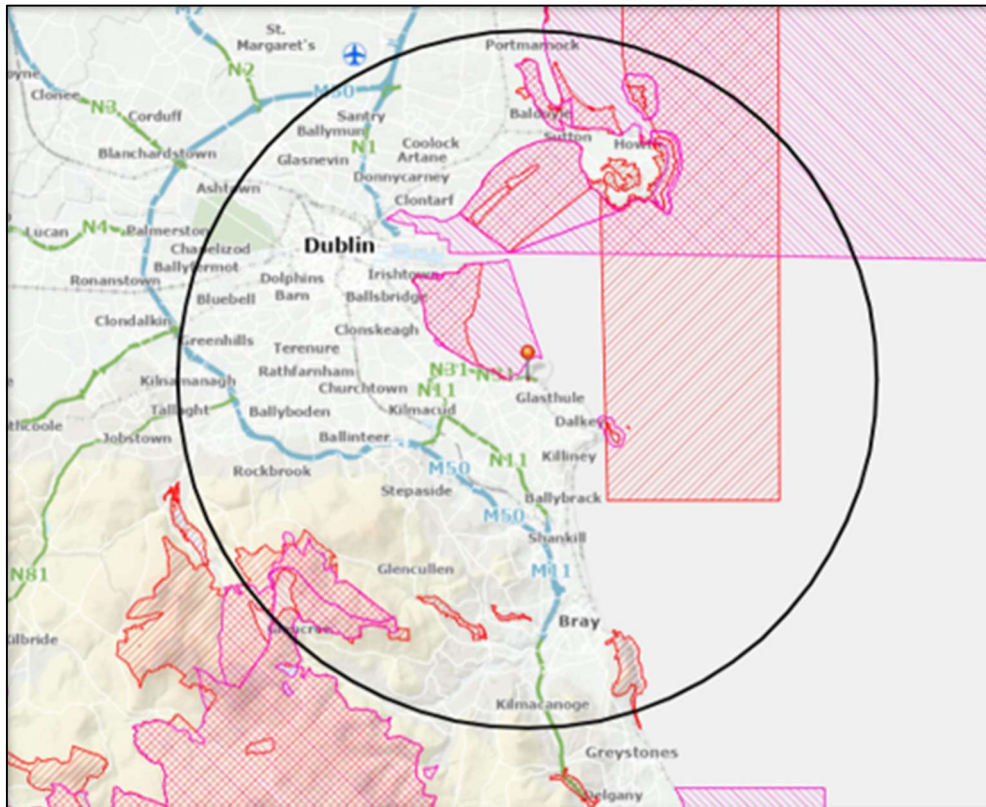
		<ul style="list-style-type: none"> • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) • Wetland and Waterbirds 	
North Dublin Bay SAC 000206	5.6km north	<ul style="list-style-type: none"> • Mudflats and sandflats not covered by seawater at low tide • Annual vegetation of drift lines • Salicornia and other annuals colonising mud and sand • Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) • Mediterranean salt meadows (<i>Juncetalia arenaria</i>) • Embryonic shifting dunes • Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) • Fixed coastal dunes with herbaceous vegetation (grey dunes) • Humid dune slacks • <i>Petalophyllum ralfsii</i> (Petalwort) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Howth Head SAC 000202	8.3km north	<ul style="list-style-type: none"> • Vegetated sea cliffs off the Atlantic and Baltic Coasts • European dry heaths 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Howth Head Coast SPA 004113	9.4km north-east	<ul style="list-style-type: none"> • Kittiwake <i>Rissa tridactyla</i> 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>
Ballyman Glen SAC 000713	9.9km south	<ul style="list-style-type: none"> • Petrifying springs with tufa formation (Cratoneurion) • Alkaline fens 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p>

			<p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Knocksink Wood SAC 000725	10.1km south-east	<ul style="list-style-type: none"> • Petrifying springs with tufa formation (Cratoneurion) • Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Baldoyle Bay SAC 000199	10.9km north	<ul style="list-style-type: none"> • Mudflats and sandflats not covered by seawater at low tide • <i>Salicornia</i> and other annuals colonising mud and sand • Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) • Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Baldoyle Bay SPA 004016	10.9km north	<ul style="list-style-type: none"> • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) • Shelduck (<i>Tadorna tadorna</i>) • Ringed Plover (<i>Charadrius hiaticula</i>) • Golden Plover (<i>Pluvialis apricaria</i>) • Grey Plover (<i>Pluvialis squatarola</i>) • Bar-tailed Godwit (<i>Limosa lapponica</i>) • Wetland and Waterbirds 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>
Bray Head SAC 000714	11.4km south	<ul style="list-style-type: none"> • Vegetated sea cliffs of the Atlantic and Baltic coasts • European dry heaths 	<p>Screened Out - There is no potential for direct effects as the proposed</p>

			<p>works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Wicklow Mountains SAC 002122	11.3km south-west	<ul style="list-style-type: none"> • Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) • Natural dystrophic lakes and ponds • Northern Atlantic wet heaths with <i>Erica tetralix</i> • European dry heaths • Alpine and Boreal heaths • Calaminarian grasslands of the <i>Violetalia calaminariae</i> • Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) • Blanket bogs (* if active bog) • Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) • Calcareous rocky slopes with chasmophytic vegetation • Siliceous rocky slopes with chasmophytic vegetation • Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles • <i>Lutra lutra</i> (Otter) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>
Wicklow Mountains SPA 004040	11.6km south-west	<ul style="list-style-type: none"> • Merlin (<i>Falco columbarius</i>) • Peregrine (<i>Falco peregrinus</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>
Ireland's Eye SPA 004117	12.4km north-east	<ul style="list-style-type: none"> • Cormorant (<i>Phalacrocorax carbo</i>) • Herring Gull (<i>Larus argentatus</i>) • Kittiwake (<i>Rissa tridactyla</i>) • Guillemot (<i>Uria aalge</i>) • Razorbill (<i>Alca torda</i>) 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SPA.</p> <p>There are no watercourses on the site, therefore there are no source-</p>

			<p>pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.</p>
Ireland's Eye SAC 002193	12.7km north-east	<ul style="list-style-type: none"> • Perennial vegetation of stony banks • Vegetated sea cliffs off the Atlantic and Baltic Coasts 	<p>Screened Out - There is no potential for direct effects as the proposed works area is located entirely outside the boundary of this SAC.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during the proposed development can be ruled out.</p> <p>There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.</p>

Figure 4. Showing European sites SACs/SPAs and NHAs/pNHAs within the wider Potential Zone of Influence of the Proposed Development.



5.0 IDENTIFICATION OF POTENTIAL IMPACTS & ASSESSMENT OF SIGNIFICANCE

The Proposed Development is not directly connected with or necessary to the management of the sites considered in the assessment and therefore potential impacts must be identified and considered.

5.1. Assessment of Likely Significant Effects

The Proposed Development is located at No. 9 Georges Place and Wash House, Kellys Avenue, Dún Laoighaire Co. Dublin. A review of aerial photography, Ordnance Survey Ireland (OSI) mapping and OSI Geographical Information System (GIS) data for rivers and streams indicates that there is no notable surface water features onsite and no direct hydrological pathways to offsite surface water bodies.

There is no connectivity to any European sites within or outside the potential Zone of Influence.

The consideration of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the Proposed Development are presented in Table 3.

Table 1 Assessment of Likely Significant Effects

Identification of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, considering the size and scale of the project.	
Impacts:	Significance of Impacts:
<p>Construction phase e.g.</p> <ul style="list-style-type: none"> - Surface water runoff from soil excavation - Dust, Noise, Vibration - Lighting disturbance - Impact on groundwater/dewatering - Storage of excavated/construction materials - Access to site 	<p>None</p> <p>The application site has no hydrological or ecological connectivity to any Natura 2000 site. The construction and operation of the proposed development will have no significant effect upon any Natura 2000 sites. There are no individual elements of the proposed project that are likely to give rise to negative impacts on these sites. There is a sufficient distance between the application site and all Natura 2000 sites to ensure that potential direct and indirect impacts will be avoided. There will be no impacts upon the Qualifying Interests of any designated site.</p>
<p>Operational phase e.g.</p> <ul style="list-style-type: none"> - Direct emission to air and water - Surface water runoff containing contaminant or sediment - Lighting disturbance - Noise/vibration - Changes to water/groundwater due to drainage or abstraction - Presence of people, vehicles, and activities - Physical presence of structures (e.g. collision risks) - Potential for accidents or incidents 	<p>None</p> <p>There is no real likelihood of any significant effects on European Sites in the wider catchment area.</p> <p>There will be no emissions from the application site to any designated site during the construction or operation phase of the project. There are no surface water features within the application site and there is no hydrological connectivity between the application site and any designated area.</p>

Describe any likely changes to the European site:	
Examples of the type of changes to give consideration to include:	None
<ul style="list-style-type: none"> - Reduction or fragmentation of habitat area - Disturbance to QI species - Habitat or species fragmentation - Reduction or fragmentation in species density - Changes in key indicators of conservation status value (water quality etc.) - Changes to areas of sensitivity or threats to QI - Interference with the key relationships that define the structure or ecological function of the site - Climate change 	<p>Land-take: There will be no land-take from any designated site. There will be no interference with the boundaries of any designated site. There will be no loss of undesignated habitats of biodiversity value.</p> <p>Distance from Natura 2000 site or key features of the site: There are eighteen Natura 2000 sites within 15km of this proposed development. The closest of these include the South Dublin Bay and River Tolka Estuary SPA and the South Dublin Bay SAC and these are 455m north-west and 910m north-west of the application site respectively. There is no hydrological connectivity between the application site and this SPA/SAC, or any other SPA/SPA within 15km of the site.</p> <p>Resource requirements (water abstraction etc.): No resources will be taken from any Natura 2000 site and there are no resource requirements that will impact upon any designated site. .</p> <p>Emissions: There will be no emissions from the application site to any designated site during the proposed construction works at this site. There are no surface water features within the application site and there is no hydrological connectivity between the application site and any designated area.</p> <p>The proposed works will not give rise to any emissions that could lead to significant effects upon the designated sites within the Zone of Influence. The separation distance between the application site and all Natura 2000 sites is considered sufficient to ensure that emissions such as noise, dust, airborne pollutants and vibrations generated during the works will not have significant effects on these designated sites.</p> <p>Excavation requirements: Construction, demolition waste and excavated material from the site will be removed to a registered site by a registered contractor. There will be no disposal of any material within any Natura 2000 site. There will be excavation works within any Natura 2000 site.</p> <p>Transportation requirements: No access to any areas of any designated site will be required during any phase of project.</p> <p>In-Combination / Cumulative Impacts: The proposed application was considered in combination with other developments or proposed developments in the greater Dún Laoghaire-Rathdown area and potential cumulative impacts were considered. Any individual application that has the potential to impact upon a Natura 2000 site will be subject to Appropriate Assessment as required under Articles 6(3) of the Habitats Directive. The proposed works will have no impacts when considered in combination with</p>

	<p>other plans and projects that have been screened for Appropriate Assessment or where mitigation measures have been included as part of Appropriate Assessment (Natura Impact Statement).</p> <p>Duration of construction, operation, decommissioning etc: The enabling works will be complete within 12 months.</p>
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On the basis of the information supplied, which is considered adequate to undertake a screening determination and having regard to:

- the nature and scale of the proposed development,
- the intervening land uses and distance from European sites,
- the lack of direct connections with regard to the Source-Pathway-Receptor model,

It may be concluded that the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on the above listed European sites or any other European site, in view of the said sites' conservation objectives.

5.2 Assessment of Potential In-Combination Effects

In-combination effects are changes in the environment that result from numerous human-induced, small-scale alterations. In-combination effects can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

As part of the Screening for an Appropriate Assessment, in addition to the Proposed Development, other relevant plans and projects in the area must also be considered at this stage. This step aims to identify at this early stage any possible significant in-combination effects of the Proposed Development with other such plans and projects on European sites. A review of the National Planning Application Database was undertaken.

The proposed development will consist of the re-development for community use of No 9 George's Place and Wash House, Kellys Ave, Dún Laoghaire, Co. Dublin. The application site has no hydrological or ecological connectivity to any Natura 2000 site. These proposed works will have no significant effect upon the Natura 2000 sites identified. There are no individual elements of the proposed project that are likely to give rise to negative effects on these sites. There is a sufficient distance between the application site and all Natura 2000 sites to ensure that potential direct and indirect impacts will be avoided. There will be no significant effects upon the Qualifying Interests of any designated site.

5.3 Finding of no Significant Effects

5.3.1 Name of project or plan

Proposed Development at No 9 George's Place and Wash House, Kellys Ave, Dún Laoghaire, Co. Dublin.

5.3.2 Name and location of the Natura 2000 site(s)

There are no Natura 2000 sites within 15km of this proposed development. There is no hydrological connectivity between the application site and this SPA/SAC, or any other SPA/SPA within 15km of the site.

There is no connectivity to any European sites within or outside the potential Zone of Influence.

5.3.3 Description of the project or plan

The proposed development comprises of:

- Full retrofit and refurbishment of no. 9 George's Place (Floor Area: 484 sqm) to accommodate new use as a creative hub with studio spaces, teaching rooms, multi-purpose rooms / meeting rooms and associated social spaces.
- Full thermal efficiency upgrading to best conservation practice.
- Demolition of existing two-storey lean to extension to no. 9 George's Place which is structurally unsound and in very poor condition (Floor area: approx. 83 sqm).
- Construction of new four-storey extension to replace existing lean-to extension to provide universal access to all levels on no. 9 George's place, to provide new multi-purpose studios and meeting rooms for the creative hub and to provide a viewing terrace at upper level. (11.8 x 9m footprint approx. 315 sqm extension).
- Ground Floor (semi-basement level of no. 9 George's Place) of extension: 95sqm containing double height entrance foyer at street level to provide universal access, lift & stair core providing access to semi-basement level of no. 9 George's Place, multipurpose room and changing places w.c.
- First floor extension: 92 sqm containing lift & stair core, multipurpose room and glazed link to no. 9 George's Place.
- Second floor extension: 92 sqm containing lift & stair core, multipurpose room, office and glazed link to no. 9 George's Place.
- Third floor of extension: 36 sqm containing lift & stair core, terrace (17 sqm) to the rear accessed from the corridor, multipurpose room with small terrace (11sqm) to the front.
- Full retrofit and refurbishment of former Wash House, Kelly's Avenue (Floor Area: 161 sqm) to include revised internal layout to accommodate new use and full thermal efficiency upgrading to best conservation practice.
- Insertion of internal platform lift in Wash House for Universal Access.
- The external courtyard between the two buildings will be retained to facilitate access and circulation between the two buildings. It will be landscaped with a pergola overhead to enhance the circulation route between the two buildings. (Courtyard 10.6m x 10m: 106 sqm)
- External enhancement to the surrounding perimeter area and enhancement of the boundaries of the site.
- The future use of the building is currently being determined through public consultation and the preparation of the Integrated Urban Study with funding from THRIVE (Town Centre First Enhancement Scheme). It will be a non-residential educational / creative hub. Probable uses include a Centre for Digital Creative Practices with educational spaces and creative studios / exhibition space / music education / teaching spaces / creative hub.

5.3.4 Is the project or plan directly connected with or necessary to the management of the site(s)

No

5.3.5 Are there other projects or plans that together with the projects or plan being assessed could affect the site.

A review of the National Planning Application Database was undertaken. The first stage of this review confirmed that there were no data outages in the area where the Proposed Development is located. The database was then queried for developments granted planning permission within 500m of the Proposed Development within the last three years.

There are no predicted in-combination effects from the Proposed development

5.4 Assessment of Significance Effects.

5.4.1 Describe how the project is likely to affect the Natura 2000 site

No significant effects are likely

A review of aerial photography, Ordnance Survey Ireland (OSI) mapping and OSI Geographical Information System (GIS) data for rivers and streams indicates that there are no watercourses in the vicinity of the Proposed Development site. This was confirmed during fieldwork on habitat assessment in April 2024. There is no connectivity to any European sites within or outside the potential Zone of Influence.

5.4.2 Explain why these effects are not considered significant.

There are no predicted effects on any European sites given:

- The lack of connectivity between the Proposed Development and any hydrological pathways between the Proposed Development site and any watercourses that lead to any European sites.
- There are no predicted emissions to air, water, or the environment during the construction or operational phases of the proposed finished product storage unit that would result in significant effects.

5.4.3 Describe how the project is likely to affect species designated under Annex II of the Habitats Directive.

No significant effects likely.

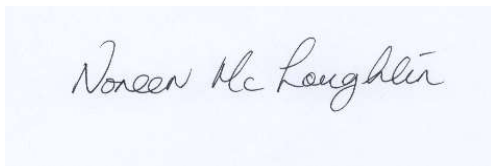
6.0 APPROPRIATE ASSESSMENT CONCLUSION

In accordance with Article 6(3) of the Habitats Directive, the relevant case law, established best practice and the precautionary principle, this AA Screening Report has examined the details of the project in relation to the relevant Natura 2000 sites within 15km of the application site.

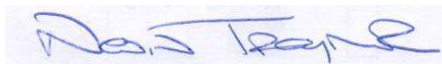
At this stage of the AA process, it is for the competent authority, i.e., Dún Laoghaire-Rathdown County Council, to carry out the screening for AA and to reach one of the following determinations:

- 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.

It is of the opinion of the authors that an AA of the proposed development is not required as it can be excluded, on the basis of objective information provided in this report, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites. Therefore, this proposed project does not need to proceed to Stage II of the Appropriate Assessment Process, i.e., a Natura Impact Statement (NIS).



Noreen McLoughlin, MSc, MCIEEM.



Nevin Traynor BSc. Env, H.Dip I.T