ENVIRONMENTAL CONSULTANTS

ECOLOGICAL IMPACT ASSESSMENT REPORT

The Metals Green, Proposed Public Park

Dún Laoghaire, Co. Dublin

November 2025

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Abbreviations

Abbreviation	Term
AA	Appropriate Assessment
BOCCI	Birds of Conservation Concern in Ireland
CJEU	Court of Justice of the European Union
EC	European Commission
IROPI	Imperative Reasons of Overriding Public Interest
LSE	Likely Significant Effects
NHA	Natural Heritage Areas
NIS	Natura Impact Statement
pNHA	proposed Natural Heritage Areas
OPR	Office of the Planning Regulator
SCI	Special Conservation Interest
TFEU	Treaty on the Functioning of the European Union
UNESCO	United Nations Educational, Scientific and Cultural Organisation

Definitions

Definition	Term
Appropriate Assessment (AA)	An assessment of the potential adverse effects of a plan or project (in combination with other plans or projects) on Special Areas of Conservation and Special Protection Areas
Department of Environment, Heritage, and Local Government	The previous name for Department of Housing, Local Government and Heritage. The Irish government department responsible for housing, local government (including planning) and heritage.
Effect	Outcome to an ecological feature from an impact, e.g., the effects on an animal population from the loss of a hedgerow.
European Commission (EC)	The executive body of the European Union responsible for proposing legislation, enforcing European law, setting objectives and priorities for action, negotiating trade agreements, and managing and implementing European Union policies and the budget.
Habitats Directive (92/43/EEC)	European Directive relevant to on the conservation of natural habitats and of wild fauna and flora
Impact	Actions resulting in changes to an ecological feature, e.g., the construction activities of a development removing a hedgerow.
Natura 2000 / European Site	A network of sites selected to ensure the long-term survival of Europe's most valuable and threatened species and habitats. European site" replaced the term "Natura 2000 site" under the EU (Environmental Impact Assessment and Habitats) Regulations 2011 S.I. No. 473 of 2011
Receptor	Environmental components that may be affected, adversely or beneficially, by the project.
Special Protection Areas (SPAs).	Sites classified in accordance with Article 4 of the EC Birds Directive (79/409/EEC) which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex 1 of the Directive), and for regularly occurring migratory Species.
Special Areas of Conservation (SACs)	Areas of protected habitats and species as defined in the Habitats Directive (92/43/EEC).
Qualifying Interest (QI)	Relates to the habitats and/or (non-bird) species for which an SAC or SPA is selected
Zone of Influence (ZoI)	Spatial extent of potential impacts resulting from the project.

1 Introduction

ID Environmental Consultants have been commissioned by Murray & Associates to provide an Ecological Impact Assessment Report for the Development of a public park with a small food and beverage outlet at the Metals Green, a site covering 0.41ha, adjacent to Dún Laoghaire Harbour, Co. Dublin.

Ecologists of ID Environmental Consultants visited the site in July 2025. The survey was carried out to investigate whether any Annex I habitats (EU Habitats Directive), Annex II species (EU Habitats Directive), Annex I Bird Species (EU Birds Directive), 'stepping stones/Ecological Corridors' (as covered under Annex 10 of the EU Habitats Directive) or locally important habitats or species are likely to be impacted upon by the proposed Development.

This assessment aimed to;

- Establish baseline ecological data for the proposed development site;
- Determine the ecological value of the identified ecological features;
- Assess the impact of the proposed Development on ecological features of value (biodiversity);
- Apply mitigation measures to avoid, reduce, remedy or compensate impacts; and
- Identify any residual impacts after mitigation and compensation.

1.1 Statement of Authority

This survey was completed by Ian Douglas (MSc, BSc, H Cert.Ag) of ID Environmental Consultants. Ian is an Ecologist and Environmental consultant with over 12 years of experience in appropriate assessment, ecological impact assessment, habitats assessment, soil science, GIS mapping and regenerative agriculture. Ian has worked on projects including large road developments, power infrastructure projects, residential developments, the design of nature trails, and the creation of constructed wetlands and on-farm habitat projects. Ian previously worked in Ecology and Agriculture in England and Australia before taking a position with Flynn, Furney Environmental Consultants in 2018. With whom he retains a position as Associate Director. Ian formed ID Environmental Consultants in 2021.

The completion of this project was also aided by Ellen Irwin. Ellen is a former student of UCD, who graduated with a degree in Agri-Environmental Science (BAgrSc, Level 8). Through this degree, Ellen has developed practical field and lab-based skills that are necessary for field/habitat surveying and soil sampling and has also gained knowledge of GIS software. Ellen has also completed modules in the areas of agri-environmental management, rural conservation and sustainable agriculture that have developed her knowledge in the policies, schemes and practices required to protect the rural environments. Since finishing her degree in May 2023, Ellen has spent the last two years working with both Ian Douglas Environmental Consultants and Flynn Furney Environmental Consultants since. During this time Ellen has gained ample experience in both ecological surveying and compiling environmental reports.

2 Legislation and Policy Context

2.1 European Council Directives

2.1.1 Council Directive on the Conservation of Natural Habitats of Wild Fauna and Flora – *92/43/EEC- The Habitats Directive*

The main aim of the Directive is to promote the maintenance of biodiversity by conserving natural habitats and the wild species listed in its Annexes. Member States are required to take measures to maintain or restore biodiversity at a favourable conservation status, whilst taking into account economic, social, and cultural requirements and regional and local characteristics.

It gives effect to site and species protection measures through the establishment of the Natura 2000 network and the designation of European Sites, including Special Areas of Conservation (SACs) and Special Protected Areas (SPAs). It also establishes a list of species (other than birds) whose habitats must be protected to secure their survival. These priority species and habitats are subject to a higher level of protection.

The Directive also requires appropriate assessment of any plan or project not directly connected with or necessary to the management of a European Site, but likely to have significant effects upon a European site, either individually or in combination with other plans or projects.

2.1.2 Council Directive on the Conservation of Wild Birds – *2009/147/EC- The Birds Directive*

The Directive provides a framework for the conservation and management of, and human interactions with, wild birds in Europe. It makes provisions for the maintenance of the wild bird populations across their natural range; conserves the habitats for rare or vulnerable species listed in Annex I and of migratory species through the classification of SPAs and provides protection for all wild birds.

2.2 Irish Legislation

The following National legislation is relevant to the proposed Development:

Wildlife Act, 1976 and Wildlife (Amendment) Act (2000) (as amended). Hereafter collectively referred to as the "Wildlife Acts". The Wildlife Acts are the principal pieces of legislation at the national level for the protection of wildlife and for the control of activities that may harm wildlife. All bird species, 22 other animal species or groups of species and 86 species of flora are protected under these pieces of legislation.

Flora (Protection) Order, 2022. This lists species of plant protected under Section 21 of the Wildlife Act, 1976.

The Planning and Development (Amendment) Act 2010 (as amended). This piece of legislation is the basis for Irish land use planning. Under the legislation, development plans (usually implemented at the local authority level) must include mandatory objectives for the conservation of natural heritage for the conservation of European Sites.

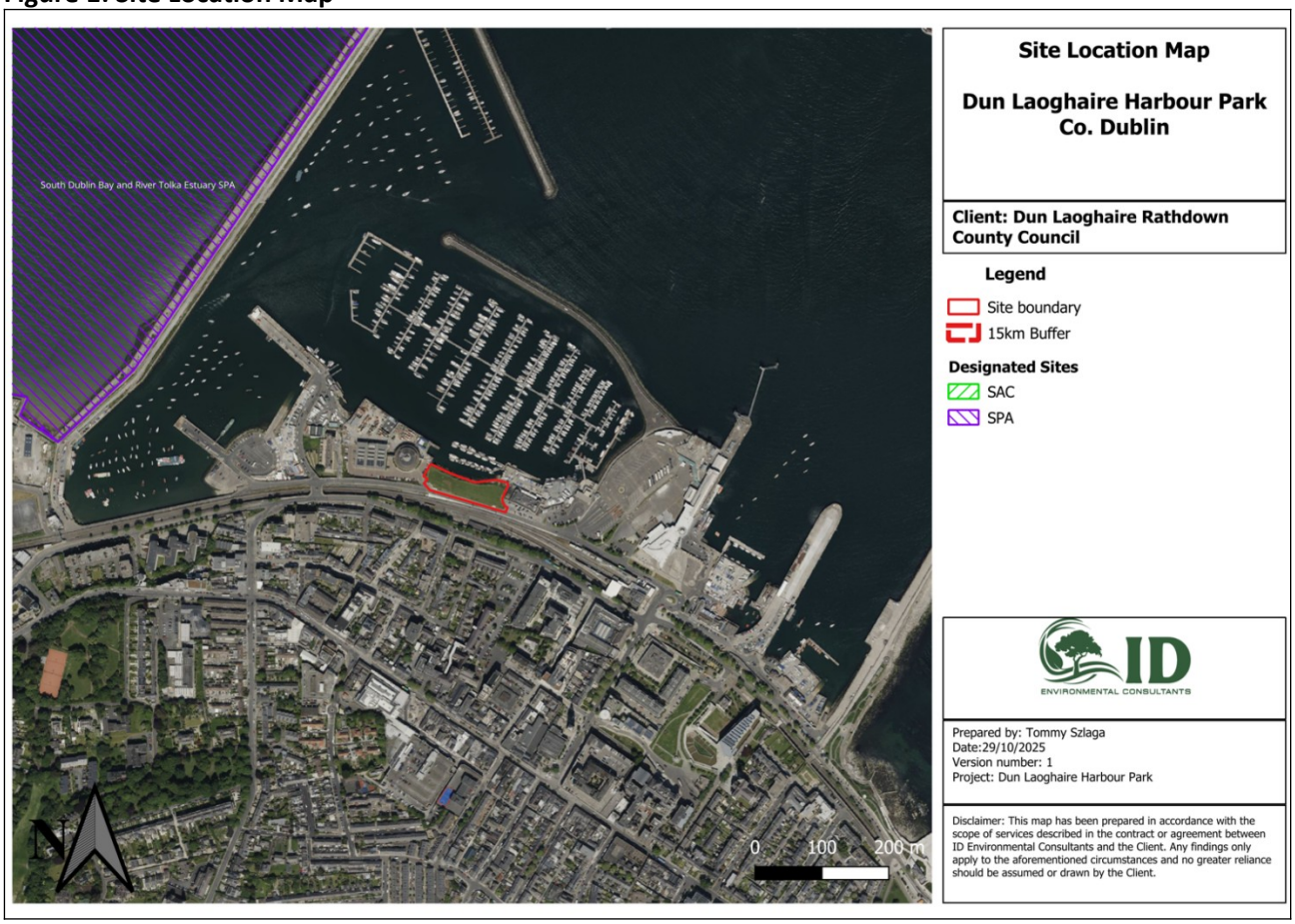
European Communities (EC) (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011 (as amended); hereafter the "Birds and Habitats Regulations". This legislation transposes the Habitats and Birds Directives into Irish law. It also contains regulations (49 and 50) that deal with invasive species (those included within the Third Schedule).

3 Project Description

3.1 Site of Works

The subject site is located on Harbour Road, Dún Laoghaire, Co. Dublin. The site is approximately 0.4 ha in size and sits on the edge of Dún Laoghaire Harbour within Dublin Bay. The proposed development site lies within the built-up urban area of Dún Laoghaire, which is dominated by retail and commercial amenities, residential housing, and transport infrastructure. The Royal Irish Yacht Club is found immediately east of the development site and the Commissioners of Irish Lights Headquarters immediately West. Dún Laoghaire train station and the DART train line run adjacent to Harbour Road just south of the development site. The proposed project will occur on the margin of Dublin Bay, which borders the site to the north. The project entails the Development of a public park designed to provide recreational benefits, featuring a children's play area, picnic benches, cycle parking and native wildflower planting. A site location map is provided in Figure 1 below.

Figure 1: Site Location Map



3.2 Development Description

The proposed Development involves the construction of a public park to be known as the Metals Green. The proposed Development will consist of the following:

- Public Park of 3,080 sq m within a site area of 4,070 sq m adjoining Harbour Road, Dún Laoghaire Harbour.
- The proposed park development comprises of plaza, paths, boundary railings and balustrades, low walls (up to 450mm height), seating/picnic tables, cycle parking stands, lawns, wildflower- and shrub-planted areas, tree planting and public lighting to part of park (adjoining Harbour Road).
- Minor alterations to c. 10 linear metres of existing rock armour sea defences are proposed, with a new retaining wall to support a viewing space on the northern edge of the park.
- A food and beverage outlet – e.g., a small modular building or food truck (c.2m x 3m in plan x 2.5m height) will be located in the park, as a commercial opportunity for a food and beverage vendor. This outlet will be serviced as follows:
- Foul sewer connection to manhole in adjoining Commissioners of Irish Lights Headquarters car park.
- Water Connection in public road from adjoining public water supply.
- Electrical power connection.
- Drainage system comprises of nature-based Sustainable Drainage Systems with rain gardens, bioretention and stormwater outlets to existing stormwater system.
- All associated site development works and associated services.

Figure 2: Extract from the proposed plan (Murray & associates, 2025)

4 Survey Methodologies

4.1 Desktop Study

Prior to the main fieldwork contributing to this assessment, a desktop survey of available information sources was carried out. These included:

- The NPWS Protected Species Database and Online Mapping
- Data on waterbodies, available for download and interrogation from the Environmental Protection Agency (EPA)[1]
- Information on the location, nature and design of the proposed Development supplied by the applicant's design team;
- Review of previous and current planning applications for the subject site and local area via Dun Laoghaire-Rathdown County Council's Planning portal[2], Myplan[3] and the An Bord Pleanála[4]
- Desk research included a review of records available through the National Biodiversity Data Centre mapping system. These included rare and protected species. Records were requested for all species appearing within the study area or immediately surrounding the study area (2km)[5].
- Data on semi-natural Irish grasslands from the Irish Semi-Natural Grassland Surveys (ISGS) 2007 – 2012
- Data contained in the National Survey of Native Woodland (NSNW) and Ancient Woodlands inventory (2011 – 2012).
- Data held on the NPWS Article 17 datasets for protected species[6]

4.2 Field Surveys

Field surveys were carried out on the 31st of July 2025. Habitats were identified, mapped, and classified and dominant plant species were noted in accordance with the guidelines given by the JNCC (2007) and The Heritage Council (2010). Habitats were classified as per Fossitt (2000). Plant nomenclature follows the BSBI's List of Accepted Plant Names (BSBI, 2007). Fauna surveys were carried out, followed by guidance in accordance with NRA (2009).

5 Ecological Impact Assessment

[1] https://gis.epa.ie/EPAMaps/
[2] https://www.dlrcoco.ie/planning
[3] https://www.myplan.ie/
[4] https://www.pleanala.ie/en-ie/map-search
[5] https://maps.biodiversityireland.ie/Map
[6] https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17

5.1 Key Ecological Receptors

In accordance with National Roads Authority guidelines (2009), impact assessment is only undertaken of 'key ecological receptors' (KERS). KERS are within the zone of influence of the project and are "both of sufficient value to be material in decision making and likely to be affected significantly". To qualify as KERS, features must be of local ecological importance (higher value) or higher.

Features falling below this threshold are not assessed. Impacts are described as being either significant or not significant. Broadly, significant effects encompass impacts on the structure and function of defined sites, habitats, or ecosystems, and on the conservation status of habitats and species (including extent, abundance, and distribution) (CIEEM, 2018).

5.2 Zones of Influence and Potential Impacts or Effects

Determining whether a KER has the potential to be affected by the Proposed Development relates to the concept of the Zone of Influence (ZoI). The ZoI relates to the nature of the Development, its likely impacts and the presence of connections or pathways between ecological receptors and the Development. Thus, ecological receptors that lack a connection to the Development are considered outside the ZoI, even if directly within the development site. Conversely, considerably removed receptors from the Development can still be considered within the ZoI if a pathway for impacts exists.

Table 1 identifies all connections (ecological, hydrological, and hydrogeological) that provide pathways for impacts between the Proposed Development and ecological receptor sites and species in the surrounding area.

Table 1: Potential impacts, effects, and their zone of influence

Potential Impact and Effect	Description	Zone of Influence
Land-take resulting in habitat loss, fragmentation or degradation.	The permanent loss of the habitat present in the footprint of the development and access route.	Lands within the proposed footprint of the proposed Development, access routes and adjacent lands that may become isolated or fragmented due to works.
Changes in water quality and quantity/distribution resulting in habitat loss or degradation.	Reduction in the quality of retained habitat or loss of habitat from surrounding areas as a result of surface water pollution.	Changes in surface water quality resulting from works associated with the proposed Development within surrounding waterbodies and related habitats.
Noise vibration resulting in disturbance.	Direct impact on feature species reducing their ability to forage or breed.	Generally assessed within 500m of the proposed works (e.g., for wintering birds), but can be significantly lower (e.g. 150 m for otter underground sites. And within 50m or less the direct vicinity of the site for

Potential Impact and Effect	Description	Zone of Influence
		other mammals and breeding birds.
Cumulative effects with other plans and projects	Cumulative effects on KERs when combined with other plans and projects, due to their occurrence over time or concentration in a specific location.	Assessed within 500m of the site of works and other down and upstream developments with 5 km of the proposed Development.

5.3 Ecological Evaluation and Impact Assessment

The basis of the assessment of the ecological value and significance of the proposed development site for habitats and species follows the Guidelines for Assessment of Ecological Impacts of National Road Schemes (National Roads Authority, 2009) and is consistent with the Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal and Marine (CIEEM, 2018). These guidelines set out the context for determining value on a geographic basis, with a hierarchy assigned to the importance of each receptor. The guidelines provide a basis for the determination of whether any particular receptor is of importance on the following scale:

- International
- National
- County
- Local Importance (Higher Value)
- Local Importance (Lower Value)

5.3.1 Assessing Ecological Value

The 'ecological value' of an area or feature is therefore defined with reference to geographical context. That is, whether it is of value locally, regionally, nationally or internationally. This is assessed by ecologists on reviewing survey outcomes. Key criteria are the presence of designated sites, the site or feature containing protected species or areas of high biodiversity. The criteria for ecological value are given in Table 2.

Table 2: Ecological Value Criteria

Ecological Value	Criteria
International	• European Sites, including Special Areas of Conservation (SAC) & Special Protection Areas (SPA). • Sites that satisfy the criteria for designation as a 'European Site' (see Annex III of the Habitats Directive, as amended). • Features essential to maintaining the coherence of the Natura 2000 Network. Sites containing 'best examples' of the habitat types listed in Annex I of the Habitats

Ecological Value	Criteria
	Directive. • Resident or regularly occurring populations (assessed to be important at the • national level) of the following: • Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; and/or • Species of animals and plants listed in Annex II and/or IV of the Habitats Directive. Ramsar Sites • World Heritage Sites (Convention for the Protection of World Cultural & Natural Heritage, 1972). • Sites hosting significant species populations under the Bonn Convention • Sites hosting significant populations under the Berne Convention
National	• Areas of Special Scientific Interest (ASSI) or Natural Heritage Area (NHA). National Nature Reserves (NNR). • Marine Nature Reserves (MNR). • Area of Outstanding Natural Beauty (AONB). • Refuge for species protected under the Wildlife (Northern Ireland) Order 1985 (as amended). • Undesignated sites fulfilling the criteria for designation as an ASSI; NNR; MNR; and/or refuge for species protected under the Wildlife (Northern Ireland) Order 1985 (as amended). • Resident or regularly occurring populations (important at the national level) of the following: • Species protected under Wildlife (Northern Ireland) Order 1985 or Wildlife Act 1976, as amended); and/or • Species listed on the relevant Red Data list. • Sites containing 'viable areas' of the habitat types listed in Annex I of the Habitats Directive.
Regional	• Sites of Local Nature Conservation Importance (SLNCI). Areas are subject to a Tree Preservation Order. • Resident or regularly occurring populations (assessed to be important at the Regional level) of the following: • Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; • Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; Species protected under the Wildlife (Northern Ireland) Order 1985 (as amended); and/or • Species listed on the relevant Red Data list. • Sites containing areas of the habitat types listed in Annex I of the Habitats Directive

Ecological Value	Criteria
	that do not satisfy the criteria for valuation as of International or National importance. • Regionally important populations of species or viable areas of semi-natural • habitats or natural heritage features identified in the National or Local Biodiversity Action Plan (BAP), if this has been prepared. • Sites containing semi-natural habitat types with high biodiversity in a regional context and a high degree of naturalness, or populations of species that are uncommon within the region. • Sites containing habitats and species that are rare or are undergoing a decline in quality or extent at a national level.
Local	• Locally important populations of priority species or habitats or features of natural heritage importance identified in the Local BAP, if this has been prepared; Resident or regularly occurring populations (assessed to be important at the Local level) of the following: • Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; • Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; Species protected under the Wildlife (Northern Ireland) Order 1985 (as amended); and/or • Species listed on the relevant Red Data list containing semi-natural habitat types with high biodiversity in a local context and a high degree of naturalness, or populations of species that are uncommon in the locality; Sites or features containing common or lower value habitats, including naturalised species that are nevertheless essential in maintaining links and ecological corridors between features of higher ecological value; • Sites containing small areas of semi-natural habitat that are of some local importance for wildlife; • Sites or features containing non-native species that are of some importance in maintaining habitat links.

An Ecological Impact Assessment must also consider the significance of effects that may be expected from a proposed development. CIEEM guidelines (2018) define a significant effect as:

"an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features'... or for biodiversity in general. Conservation objectives may be specific (e.g., for a designated site), broad (e.g. national/local nature conservation policy), or more wide-ranging (e.g., biodiversity enhancement). Effects can be considered significant at a wide range of scales from international to local".

It also states that:
"an effect that is sufficiently important to require assessment and reporting so that the decision maker is adequately informed of the environmental consequences of permitting a project. A significant effect is a positive or negative ecological effect that should be given weight in judging whether to authorise a project: it can influence whether permission is given or refused and, if given, whether the effect is important enough to warrant conditions, restrictions or further requirements such as monitoring".

5.4 Predicted Impacts and Significance

These possible impacts have been assessed under the CIEEM (2018) and the National Roads Authority guidelines (NRA, 2009). Criteria for assessment of duration of impacts used according to EPA guidelines (EPA, 2002). These provide guidance on assessing the impact significance upon features of sites proposed for works. Impact significance must be evaluated in the context of the site and the ecological values of the features under study.

The 'ecological value' of an area or feature, therefore, is defined with reference to geographical context. That is, whether it is of value locally, regionally, nationally or internationally. This is assessed by ecologists on reviewing survey outcomes. Key criteria are the presence of designated sites, the site or feature containing protected species or areas of high biodiversity. The criteria for ecological value are given in Table 3 below.

Table 3: Ecological Value Criteria

Ecological Value		Description
Significant Negative Effect	**Major Adverse**	• Loss of, permanent damage to or adverse impact on any part of a site of international or national importance; • Loss of a substantial part or key feature of a site of regional importance; • Loss of favourable conservation status (FCS) of a legally protected species; • Loss of or moderate damage to a population of nationally rare species.
	Moderate Adverse	• Temporary disturbance to a site of international or national importance, but no permanent damage; • Loss of or permanent damage to any part of a site of regional importance; • Loss of a key feature of local importance; • A substantial reduction in the numbers of legally protected species such that there is no loss of FCS, but the population is significantly more vulnerable; • Reduction in the amount of habitat available for a nationally rare species, or species that are notable at a regional or county level.
No Significant Effect	**Minor Adverse**	• Temporary disturbance to a site of regional value, but no permanent damage; • Loss of, or permanent damage to, a feature with some ecological value in a local context but that has no nature conservation designation; • A minor impact on legally protected species but no significant habitat loss or

Ecological Value		Description
		reduction in FCS; • A minor impact on populations of nationally rare species or species that are notable at a regional or county level.
	Negligible	• No impacts on sites of international, national or county importance; • Temporary disturbance or damage to a small part of a feature of local importance; • Loss of or damage to land of negligible nature conservation value; • No reduction in the population of legally protected, nationally rare, nationally scarce or notable (regional level) species on the site or its immediate vicinity. • Beneficial and adverse impacts balance such that the resulting impact has no overall effect upon the feature.
	Minor Beneficial	• A small but clear and measurable gain in general wildlife interest, e.g., small-scale new habitats of wildlife value created where none existed before or where the new habitats exceed in area that habitats lost.
Significant Positive Effect	**Moderate Beneficial**	• Larger new scale habitats (e.g., net gains over 1 ha in area) were created, leading to significant measurable gains in relation to the objectives of biodiversity action plans.
	Major Beneficial	• Major gains in new habitats (net gains of at least 10 ha) of high significance for biodiversity being those habitats, or habitats supporting viable species populations, of national or international importance cited in Annexes I and II of the Habitats Directive or Annex I of the Birds Directive.

5.4.1 Impact Duration and Likelihood

The duration of impact must also be considered when assessing overall ecological impacts. Criteria for assessment of duration of impacts used (EPA 2002), the following terms when quantifying duration:

Table 4: Impact Duration and Timescales

Impact Duration	Timescale
Temporary	Up to 1 year
Short-term	1-7 years
Medium-term	7-15 years
Long-term	15-60 years
Permanent	Over 60 years

The likelihood of impacts should also be defined. Assessment of the likelihood of impact followed CIEEM

guidelines. The assessed likelihood is as follows:

Table 5:Likelihood and Probability of Impacts

Likelihood	Probability
Almost Certain	Probability estimated at greater than 95%
Probable or Likely	Probability estimated between 50% and 95%
Unlikely	Probability estimated between 5% and 50%
Extremely Unlikely	Probability estimated at less than 5%
Almost Certain	Probability estimated at greater than 95%

6 Ecological Assessment

6.1 Watercourses and Surface Water Bodies

The subject site directly adjoins the southern shore of Dublin Bay at Dún Laoghaire Harbour. Dublin Bay is designated as part of the South Dublin Bay and River Tolka Estuary SPA (Site Code: 004024) and the South Dublin Bay SAC (Site Code: 000210), reflecting its importance for a range of coastal habitats and waterbird species.

Dublin Bay is designated as a Special Protection Area (SPA) under the EU Birds Directive, with special conservation interest for species such as light-bellied brent goose (*Branta bernicla hrota*), Oystercatcher *(Haematopus ostralegus),* ringed plover (*Charadrius hiaticula*), grey plover (*Pluvialis squatarola*) and bar-tailed godwit (*Limosa lapponica*). The EU Birds Directive places significant emphasis on wetlands, and, as part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds (NPWS, 2014). It is designated as a Special Area of Conservation (SAC) under the EU Habitats Directive, with species conservation interests in habitats such as Mudflats and Sandflats not covered by seawater at low tide, Annual vegetation of drift lines, and Embryonic shifting dunes.

Dublin Bay was recorded as having 'Good" water quality status from monitoring under the Coastal Water Framework Directive (WFD) Period 2019-2024.

6.2 Designated Sites

Sites designated for the conservation of nature in Ireland include:

- Special Areas of Conservation (SACs) and:
- Special Protection Areas (SPAs).
- Natural Heritage Areas (NHAs)
- proposed Natural Heritage Areas (pNHAs)

SPAs and SACs form the *Natura 2000* network of sites. SPA's and SACs are prime wildlife conservation areas in the country, considered to be important on a European as well as Irish level. SPAs and SAC are designated under EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats)

Regulations 2011 (S.I. No. 477 of 2011), as amended.

Natural Heritage Area (NHA) is the basic designation for wildlife in Ireland. These are areas considered important for their habitats or species of plants and animals. They first entered European Law under the 1976 Wildlife Act, were transposed into Irish law with the 1997 Natural Habitats Regulations (S.I. No. 94 of 1997), and finally gained full statutory recognition in Ireland with the passing of the Wildlife (Amendment) Act 2000.

pNHA sites were published on a non-statutory basis in 1995 but have not since been statutorily proposed or designated. These sites are designated as being of significance for species and habitats. While not afforded the same protection as sites protected under the Habitats Directive, they are subject to protection through the following mechanisms:

- Agri-environmental farm planning schemes such as ACRES (Formally the GLAS)
- Forest Service requirement for NPWS approval before they will pay afforestation grants on pNHA lands
- Recognition of the ecological value of pNHAs by Planning and Licensing Authorities.

All designated sites within close proximity of the proposed Development were considered during the desktop study stage of this screening assessment to assess the potential for significant effects on their Qualifying Interests/Special Conservation Interests and, where available, Conservation Objectives.

Designated sites identified for the conservation of the natural surroundings of the proposed works are detailed in Table 6. Maps of selected sites are shown in Figure 3.

Table 6: Designated areas within 15km of the proposed development site

Site Code	Site Name Designation	Distance to the designated site	Designation	Connectivity to the project site
4024	South Dublin Bay and River Tolka Estuary	468m	SPA	None
0210	South Dublin Bay	488m	pNHA	None
1206	Dalkey Coastal Zone and Killiney Hill	635	pNHA	None
0210	South Dublin Bay	1km	SAC	None
3000	Rockabil to Dalkey Island	3.1	SAC	None
4172	Dalkey Islands	3.3km	SPA	None
1205	Booterstown Marsh	4km	pNHA	None
0206	North Dublin Bay	5.4km	pNHA	None
0206	North Dublin Bay	5.4km	SAC	None
4006	North Bull Island	5.5km	SPA	None

Site Code	Site Name Designation	Distance to the designated site	Designation	Connectivity to the project site
1211	Loughlinstown Woods	5.5km	pNHA	None
0201	Dolphins Dublin Docks	6.4km	pNHA	None
1207	Dingle Glen	6.5km	pNHA	None
1753	Fitzsimon's Wood	6.8km	pNHA	None
0202	Howth Head	8.1km	SAC	None
2104	Grand Canal	8.2km	pNHA	None
2103	Royal Canal	8.8km	pNHA	None
1753	Ballybetagh Bog	9km	pNHA	None
4113	Howth Head Coast	9.1km	SPA	None
0210	South Dublin Bay	9.5km	pNHA	None
0713	Ballyman Glen	10km	pNHA	None
0725	Knocksink Wood	10.3km	SAC	None
0199	Baldoyle Bay	10.7km	SAC	None
4016	Baldoyle Bay	10.8km	SPA	None
2122	Wicklow Mountains	11.4km	SAC	None
0714	Bray Head	11.5km	SAC	None
4040	Wicklow Mountains	11.9km	SPA	None
1768	Powerscourt Woodland	11.9km	pNHA	None
1754	Dargle River Valley	12km	pNHA	None
2193	Irelands Eye	12.6km	SAC	None
4117	Irelands Eye	12.1km	SPA	None
0203	Ireland's Eye	12.5km	pNHA	None
0991	Dodder Valley	12.8km	pNHA	None
1769	Great Sugar Loaf	13.2km	pNHA	None
0178	Santry Demesne	13.3km	pNHA	None
1763	Sluice River Marsh	13.8km	pNHA	None
0724	Kilmacanoge Marsh	14.3km	pNHA	None

No possible connectivity exists between the proposed Development and any European or Nationally designated

site within or beyond 15km of the development site. This was confirmed during an Appropriate Assessment Screening Assessment carried out by the present authors for the Proposed Development. The AA Screening Report concluded the following:

"In our professional opinion and in view of the best scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed Development, individually/in combination with other plans and projects (either directly or indirectly), is not likely to have any significant effects on nearby designated sites. ***Therefore, progression to Stage 2 Appropriate Assessment is not required."***

No risks to the conservation objectives or integrity of any nationally or internationally designated site are predicted as a result of the proposed works for one or a combination of the following:

- Lack of connectivity between the works areas and the designated area
- Significant buffer distance between the proposed Development and the designated area
- The nature of the site's conservation objectives
- No impact or change to the management of the designated area or;
- No change to the chemical or physiological condition of the designated site as a result of the proposed Development.

Figure 3: European Designated Sites within 15km of the Proposed Development

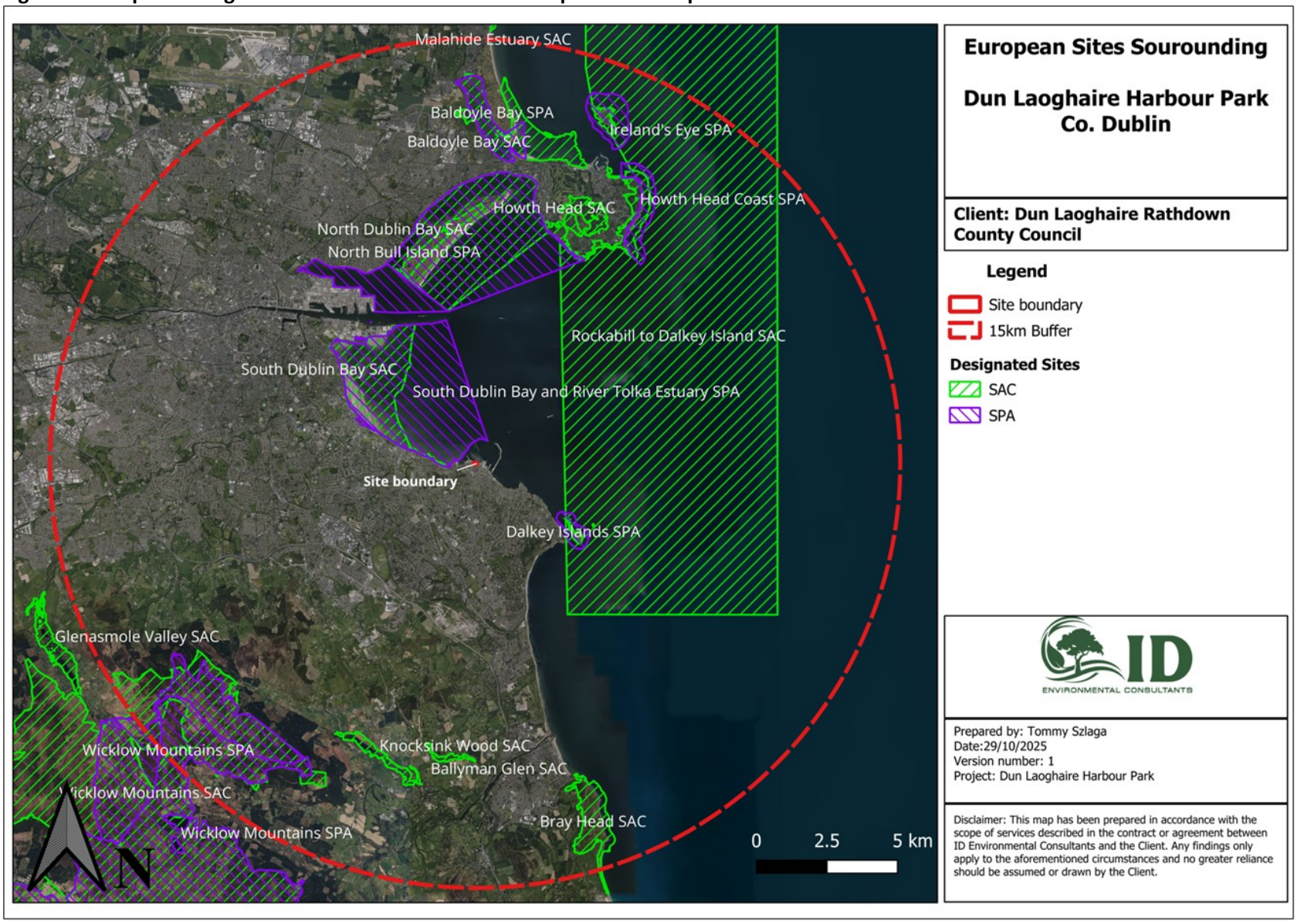
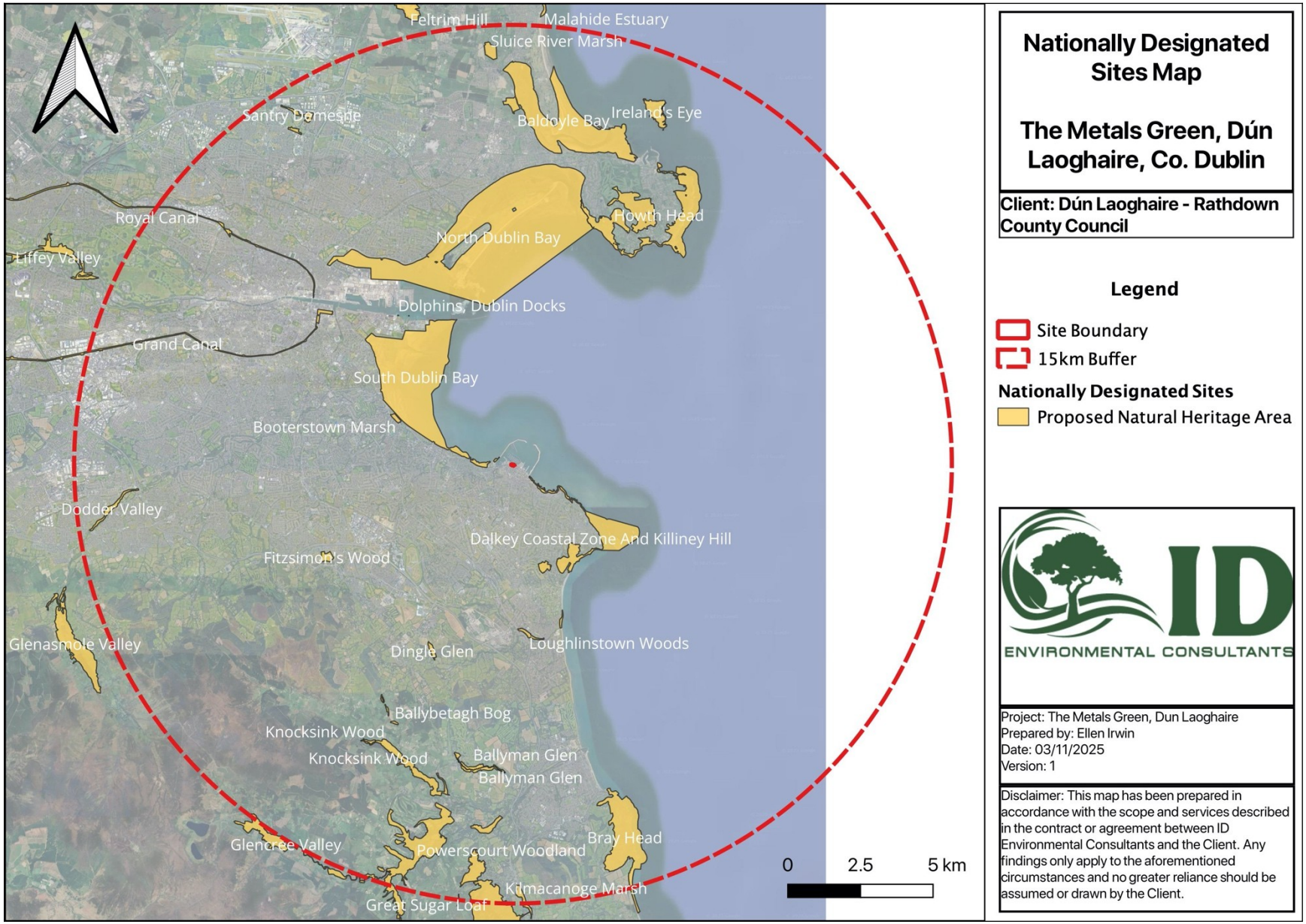


Figure 4: Nationally Designated Sites within 15km of the Proposed Development



6.3 Habitats and Flora

Habitats were identified, mapped, and classified and dominant plant species were noted in accordance with the guidelines given by Fossitt (2010). Habitats were classified as per Fossitt (2000). Plant nomenclature follows the BSBI's List of Accepted Plant Names (BSBI, 2007). The survey timings fall within the recognised optimum period for vegetation surveys/habitat mapping i.e. April to September (Smith et al., 2011).

Habitats considered to be of ecological significance, particularly those having the potential to correspond to those listed in Annex I of the EU Habitats Directive 92/43/EEC, were identified and classified as Key Ecological Receptors (KERs).

Field surveys focusing on flora and habitat were carried out on the 31st of July 2025. The desktop assessment of recorded flora via the NBDC[7] no records of protected or rare flora within 2km of the subject lands. The following habitat types were recorded within the survey area.

6.3.1 Amenity Grassland (GA1)

The majority of the proposed development area conforms to this habitat type, dominated by typical species such as Perennial Rye Grass *(Lolium perenne),* White clover (*Trifolium repens)* and Plantain *(Plantago major).*

Figure 5: Amenity Grassland (GA1)

6.3.2 Recolonising Bare Ground (ED3)

[7] https://maps.biodiversityireland.ie/Map

Vegetation developing along the rock armour adjacent to the amenity grassland was classified as **Recolonising Bare Ground (ED3)**, made up of Sycamore *(Acer pseudoplatanus),* Elder *(Sambucus nigra)*, Willowherb *(Chamaenerion angustifolium)* and Butterfly-bush *(Buddleja davidii).* This habitat represents naturally regenerating vegetation on artificial substrates and is typical of coastal infrastructure.

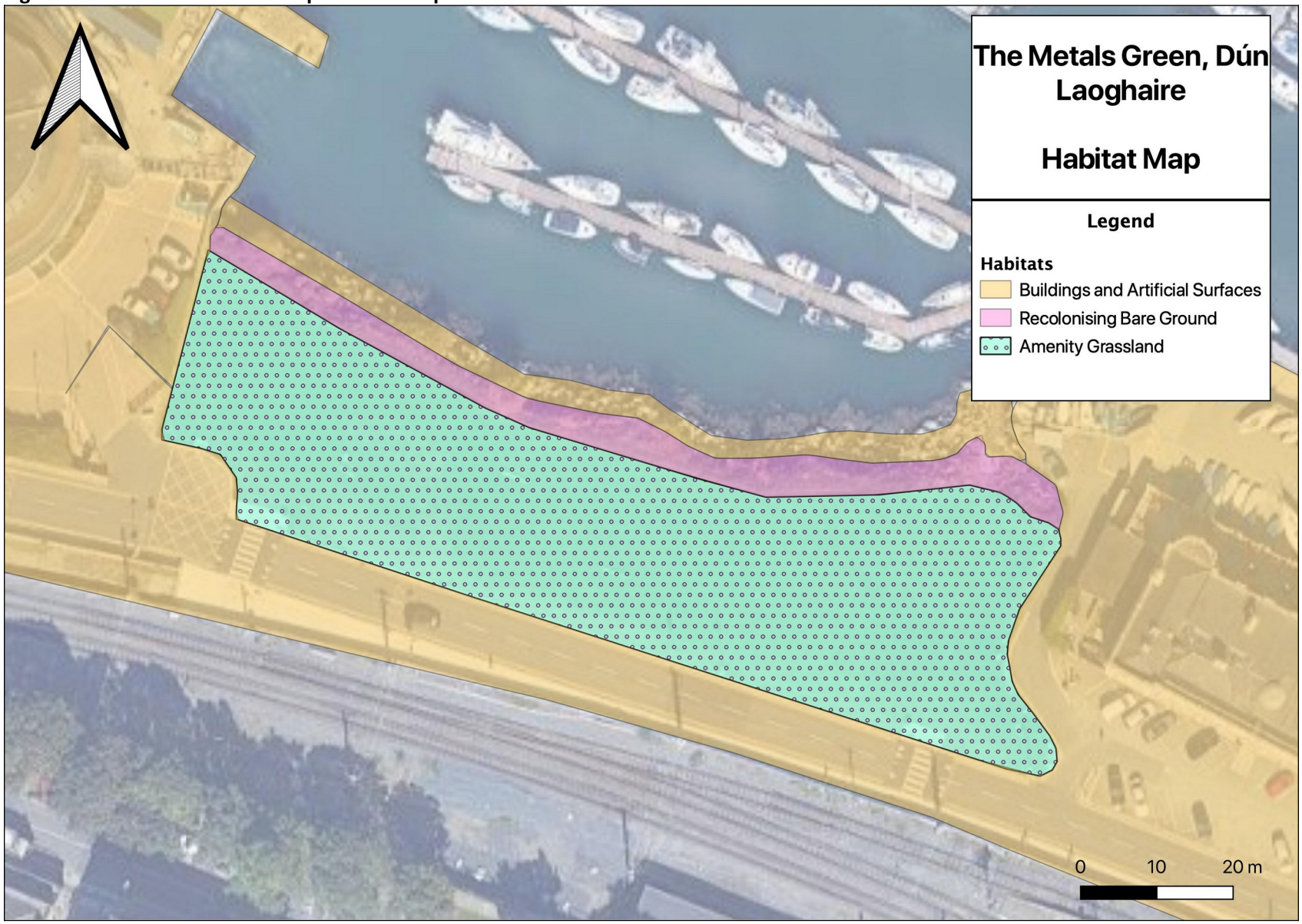
Figure 6: Recolonising Bare Ground (ED3)

6.3.3 Buildings and Artificial Surfaces (BL3)

The majority of the area to the south of the proposed works is within the 'made ground' of the urban roadways of Dun Laoghaire, which conform to **Buildings and artificial surfaces (BL3)**. The surrounding landscape was composed mostly of further **Buildings and artificial surfaces (BL3)** such as private dwellings, retail and commercial amenities and transport infrastructure. Three seating benches are also located within the area of works in the amenity grassland section. A galvanised steel railing runs along the harbour edge, forming a barrier between the amenity grassland and the rock armour.

Figure 7: Harbour Road and associated urban infrastructure

Figure 8: Habitats within the Proposed Development Site



6.3.4 Invasive Species

The European Union (EU) adopted Regulation (EU) No 1143/2014 on September 29, 2014, to address the introduction and spread of invasive alien species (IAS). This legally binding regulation, applicable to all EU member states, entered into force on January 1, 2015. It establishes a framework to prevent, minimise, and mitigate the negative impacts of both intentional and unintentional IAS introduction and spread. These impacts encompass biodiversity loss, degradation of associated ecosystem services, and potential harm to human health and the economy.

In line with this regulation, Ireland launched its third National Biodiversity Action Plan (NBAP) in October 2017, covering the 2017-2021 period. This plan builds upon the previous NBAPs and outlines 119 targeted actions under seven strategic objectives. The goal is to achieve Ireland's national "Vision for Biodiversity" through collaborative efforts across government, civil society, and the private sector.

The European Communities (Birds and Natural Habitats) Regulations 2011 contain important new provisions to address the problem of invasive species. A blocklist of unwanted species is set out in the Regulations. It will be an offence without a licence to release or allow to disperse or escape, to breed, propagate, import, transport, sell or advertise such species. Two regulations that deal specifically with these scheduled lists of species are:

Regulation 49: Prohibition on introduction and dispersal of certain species

Regulation 50: Prohibition on dealing in and keeping certain species (however, Regulation 50 is not yet in effect).

Table 7: Invasive Species recorded on the NDBC database within 2km of the subject site

Species name	Record count	Date of last record	Impact	Title of dataset	Recorded during site surveys
Wakame *(Undaria pinnatifida)*	1	21/05/2017	High	National Invasive Species Database	None recorded
Wireweed *(Sargassum muticum)*	10	18/09/2024	High	Explore Your Shore	None recorded
Japanese Skeleton Shrimp *(Caprella mutica)*	5	31/12/2022	Medium	National Invasive Species Database	None recorded
Butterfly-bush *(Buddleja davidii)*	3	05/03/2023	Medium	Vascular plants: Online Atlas of Vascular Plants 2012 Onwards	Yes
Sycamore *(Acer pseudoplatanus)*	2	27/02/2025	Medium	Vascular plants: Online Atlas of Vascular Plants 2012 Onwards	None recorded
Traveller's joy *(Clematis vitalba)*	1	01/12/2018	Medium	Vascular plants: Online Atlas of	None recorded

				Vascular Plants 2012 Onwards	
Wall Cotoneaster *(Cotoneaster horizontalis)*	1	16/04/2023	Medium	Vascular plants: Online Atlas of Vascular Plants 2012 Onwards	None recorded
Harlequin Ladybird *(Harmonia axyridis)*	4	05/09/2025	High	Ladybirds of Ireland	None recorded
Budapest Keeled Slug *(Tandonia budapestensis)*	2	04/05/2002	Medium	All-Ireland Non-Marine Molluscan Database	None recorded
Botrylloides violaceus	1	31/12/2022	Medium	National Invasive Species Database	None recorded
Brown Rat *(Rattus norvegicus)*	4	22/09/2018	High	Mammals of Ireland 2016-2025	None recorded
Grey Squirrel *(Sciurus carolinensis)*	4	26/10/2024	High	National Invasive Species Database	None recorded
Didemnum vexillum	1	31/12/2022	High	National Invasive Species Database	None recorded
Leathery Sea Squirt *(Styela clava)*	2	31/12/2022	High	National Invasive Species Database	None recorded

No third-schedule invasive species were recorded within or directly surrounding the proposed development area. Medium-impact species, Butterfly bush (Buddleja davidii) and Sycamore (Acer pseudoplatanus), were recorded adjacent to the works area within the rock armour. Neither species is listed in the Third Schedule; therefore, there is no requirement for an invasive species management plan. No management actions are required.

6.4 Otters

Otters (*Lutra lutra*) and Pine Martens (*Martes martes*), along with their breeding and resting places, are protected under the provisions of the Wildlife Act, 1976, as amended by the Wildlife (Amendment) Act, 2000. Otters have additional protection because of their inclusion in Annex II and Annex IV of the Habitats Directive, Pine Martens have additional protection under Annex V of the Habitats Directive, which is transposed into Irish law in the European Communities (Natural Habitats) Regulations (S.I. 94 of 1997), as amended.

Historical record checks of the NBDC database found two Otter records, the most recent in 2018.
No records of Pine Marten were recorded in the database near the site of works.

The Dún Laoghaire–Rathdown Otter Survey 2020, carried out for the County Council in 2019 and 2020, identified evidence of extensive usage of Dún Laoghaire Harbour by otter, a species subject to a system of strict protection under the Habitats Directive (92/43/EEC). Sprainting sites were identified on both piers and an otter couch located on the inside of the West Pier.

No evidence of Otter activity was observed during ground surveys of the site or its surroundings in July 2025.

6.5 Other Fauna

Badgers (*Meles meles*) and their refugia are protected under the Wildlife (Amendment) Act 2000 and the Wildlife Act 1976 and by European legislation. No records of Badger were found on the NBDC database within 2km of the site (O22P). No suitable habitat for badgers was found within or around the development site.

Both the Red Squirrel (*Sciurus vulgaris*) and the Pine Marten (*Martes martes*) are protected under the Irish Wildlife Act (1976), the Wildlife (Amendment) Act (2000), and the Bern Convention Appendix III. The European Union's Habitats and Species Directive further obliges Ireland to maintain the favourable conservation status of both of these species throughout their home range. No records of Pine Marten or Red Squirrel are found in the NBDC database for the area. No signs of either species were found within or surrounding the study area.

6.6 Bats

All bat species are protected by law in Ireland at a national and European level. Nationally, the Wildlife Act 1976 (amended 2000) makes it an offence to wilfully interfere with or destroy the resting or breeding place for bats. All species of Irish bats are listed under Schedule 5 of the Wildlife Act (1976), making it an offence to:

- Intentionally kill, injure, or take a bat
- Possess or control any live or dead specimen or anything derived from a bat
- Wilfully interfere with any structure or place used for breeding or resting by a bat
- Wilfully interfere with a bat while it occupies a structure or place that it uses for that purpose.

The EU 'Habitats' Directive (92/43/EC; transposed into Irish law by EC Birds and Natural Habitats Regulations (S.I. 477 of 2011) provides legal protection for bats and their roosts at a European Union level. In addition, the Irish government is a signatory to the 1979 Bonn Convention on the Conservation of Migratory Species of Wild Animals and the 1982 Convention on the Conservation of European Wildlife and Natural Habitats. Ireland must also fulfil commitments under the 1991 'Eurobats Agreement' for the conservation of bats in Europe. Under the EU Habitats Directive, lesser horseshoe bats are listed as an Annex II species (afforded special protection). All other Irish bat species are listed in Annex IV (general protection) of this directive.

Regulation 51(2) of the 2011 Regulations provides – ("(2) Notwithstanding any consent, statutory or otherwise, given to a person by a public authority or held by a person, except in accordance with a licence granted by the Minister under Regulation 54, a person who in respect of the species referred to in Part 1 of the First Schedule— (a) deliberately captures or kills any specimen of these species in the wild, (b) deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration, (c) deliberately takes or destroys eggs of those species from the wild, (d) damages or destroys a breeding site or resting place of such an animal, or (e) keeps, transports, sells, exchanges, offers for sale or offers for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive, shall be guilty of an offence.")

Leisler's bats and pipistrelle bats are regularly observed foraging over Dun Laoghaire Harbour during periods of the

year when bat species are active and may have roosts in harbour buildings or other structures.[8].

6.6.1 Bat Activity Surveys

Signs of bats and bats' roosting potential surveys were carried out following Bat surveys in accordance with "Bat Surveys for Professional Ecologists: Good Practice Guidelines"[1]. An inspection of the external areas, including trees within and surrounding the subject lands, was conducted. Bat activity was evidenced by signs including: dead specimens, bat droppings, urine splashes, fur-oil staining, squeaking noises, feeding remains (moth wings), bat-fly (Nycteribiid) pupal cases, and odour.

To assess potential bat activity across the proposed development site, a transect survey was carried out around the park on the night of the 31st of July using an EchoMeter Touch 2 Pro. This device records species observed in real time. The data were also analysed using Keiolodoscope Software to determine bat species presence and activity levels, with the aim of informing an assessment of the potential impacts of the proposed works on local bat populations. A table of results is shown in Table 8 below.

Table 8: Bat Survey Results

Common Name	Species	Number Recorded
Leisler's bat	Nyctalus leisleri	2
Common pipistrelle	Pipistrellus pipistrellus	1
Grand Total		**3**

Results of the bat survey show two bat species were recorded in very small numbers: common pipistrelle and Leisler's bat. These species represent two of the nine bat species in Ireland, and all have a 'Favourable Status' under the EU Habitats Directive. None of the bats recorded were observed; they were only detected by the detector. Based on Collins 2023, the site was assessed as having negligible roosting and foraging potential. Collins (2023) defines these as follows.

Negligible Roosting Potential: Negligible habitat features on site likely to be used by roosting bats

Negligible Foraging Potential: Negligible habitat features on site likely to be used by commuting or foraging bats

6.6.2 Bat Desktop Study Results

Records from the National Biodiversity Data Centre (NBDC) for the 2km square O22P, within which the site of works is located, were extracted and reviewed (accessed on 04/11/2025). Bat species recorded in the NBDC database within 2km of the proposed development site are shown in Table 9 below.

Table 9: NBDC Bat Records

Species Name	Record Count	Date of Last	Title of Dataset

[8] NPWS coorspondance shown in Appendix 2

		Record	
Common Pipistrelle *(Pipistrellus pipistrellus sensu stricto)*	2	19/06/2012	National Bat Database of Ireland
Leisler's Bat *(Nyctalus leisleri)*	4	01/07/2020	National Bat Database of Ireland
Pipistrelle *(Pipistrellus pipistrellus sensu lato)*	1	12/04/2022	National Bat Database of Ireland

6.6.3 Bat Survey Summary

Treelines and hedgerows are generally favoured by bats for commuting and foraging. The area of works does not support any mature treeline or hedgerow, offering limited potential foraging and commuting areas for bats. Given the open nature and urban context of the development site, along with the presence of street lighting and the absence of woody or vegetated features, the site is considered low in suitability for bats. No trees or structures with potential bat roosting features were recorded within the site.

6.7 Birds

The proposed development site is found adjacent to Dublin Bay, 468m from South Dublin Bay and River Tolka Estuary SPA at the nearest point. Under the E.U. Birds Directive, the following species are of special conservational interest: light-bellied Brent goose (*Branta bernicla hrota*), Oystercatcher (*Haematopus ostralegus)*, ringed plover (*Charadrius hiaticula*), grey plover (*Pluvialis squatarola*), Knot *(Calidris canutus)*, Sanderling *(Calidris alba)*, Dunlin *(Calidris alpina),* Redshank *(Tringa totanus),* Black-headed Gull *(Chroicocephalus ridibundus),* Roseate Tern *(Sterna dougallii),* Common Tern *(Sterna hirundo),* Arctic Tern *(Sterna paradisaea)* and bar-tailed godwit (*Limosa lapponica*) within that SPA.

The QIs/SCIs for the South Dublin Bay and River Tolka Estuary are Wetlands and waterbirds, light-bellied brent goose, black-headed gull, thirteen species and eight wader species. Of these bird species, all to a greater or lesser extent use areas along or adjacent to the West Pier to forage in or for roosting (NPWS, 2025). It should also be noted that a colony of about a dozen pairs of black guillemots nest each year in cavities under the Carlisle Pier, one of only a small number of such colonies on the Irish East Coast (NPWS, 2025).

6.7.1 Breeding Bird Survey

All birds seen and heard during site surveys were recorded. All of the birds recorded were typical species seen and heard in coastal and urban settings and are listed in Table 10 below. No SCI species were recorded within or surrounding the proposed development area. No habitat was identified that could serve as a key foraging or roosting habitat for any SCI species.

Table 10: Bird Species Recorded during Site Survey

Bird Species	Scientific Name	Conservation Status
House Sparrow	*Passer domesticus*	Amber
Woodpigeon	*Columba palumbus*	Green
Common Gull	*Larus canus*	Amber
Swallow	*Hirundo rustica*	Amber
Herring Gull	*Larus argentatus*	Amber
Great Black-backed Gull	*Larus marinus*	Green
Hooded Crow	*Corvus cornix*	Green

6.8 Cumulative and In combination Effects

Cumulative impacts or effects are changes in the environment that result from numerous human-induced, small-scale alterations. Cumulative impacts can be thought of as occurring through two main pathways: first; through persistent additions or losses of the same materials or resources, and second, -through the compounding effects as a result of the coming together of two or more effects (Bowers-Marriott, 1997).

Several other projects have been considered as part of the screening process. A search of the planning websites of Dun-Laoghaire-Rathdown County Council and An Bord Pleanála was carried out as part of the desktop study. A number of planning applications were reviewed. The greater majority of the schemes were for the construction or alteration of private dwellings. Such small-scale and a number of moderate-scale projects in the area, such as residential developments, have negligible effects. Considering that the proposed project has a small-scale, short-term construction phase and a general operational phase, and is consistent with the existing land use surrounding the site, it is not foreseen that the proposed project will have any significant combined effects. As no impacts are predicted from the proposed Development, no cumulative or in-combination impacts are therefore also predicted.

Table 11 below lists the major projects noted within close proximity to the subject site. This includes an assessment of each project for LSE in conjunction with the Proposed Development, which may lead to cumulative or combined impacts or effects.

Table 10: Cumulative Impact Assessment

Reference	Description of the Development	Likelihood of Significant Effects	Cumulative and In combination Effects
8923	The proposed Coastal Mobility Scheme Development to urban public realm and public and non-public roads (c 4.7km) constitutes Development in accordance with the Planning and Development Act 2000 (as amended), which requires an Environmental Impact Assessment (EIA) and Appropriate Assessment (AA). The Development Includes:- 1. Works comprising physical interventions and improvements, partially in a business district, and 2. Change of use comprising repurposing of roads from use by motorised and non-motorised vehicles to only use by motorised vehicles to form a 2-way cycle track. The Development entails making an existing temporary development, that was not assessed, carried out in 2020 permanent as well as additional sections of proposed Development.	An Appropriate Assessment Screening Report has been developed for this project, which concluded that the proposed Development will not have a significant effect on any European Site and so an NIS is not required.	None Identified
None	Dún Laoghaire–Rathdown County Council has published a Draft Masterplan outlining the long-term redevelopment of the historic Dún Laoghaire Harbour in County Dublin. The plan sets out a phased approach to the regeneration of the harbour area over an estimated 20-year period, with the objective of enhancing its recreational, cultural, residential, and tourism functions while maintaining its heritage and maritime character. Key elements of the proposed Development include: • Marine and Recreational Facilities: Installation of floating pontoons to expand berthing capacity for small craft and leisure vessels. • Public Amenities: Development of a seawater swimming pool, sauna facilities, and upgraded public realm spaces to promote outdoor recreation and year-round waterfront access. • Cultural and Events Infrastructure: Construction of an events and performance centre to accommodate cultural, educational, and community activities. • Tourism and Hospitality: Provision for a spa hotel and associated wellness facilities, supporting increased visitor	Given the location and scale of this proposed plan, it is highly likely that possible LSE will arise from this Development.	None. Given that this proposed project is still in the planning stages, it is extremely unlikely that any of the works will overlap in timeframes with any of the works proposed as part of this project.

	engagement and local economic activity. • Residential Development: Introduction of new housing within designated zones of the harbour precinct to encourage mixed-use urban renewal and enhance vibrancy in the area. • Environmental and Heritage Integration: The masterplan emphasises adaptive reuse of historic harbour structures, improved public access, and the implementation of sustainable design principles to protect the marine environment and built heritage fabric of the site. Overall, the draft masterplan seeks to create a multifunctional waterfront destination that integrates maritime heritage, recreation, tourism, and community use in a manner consistent with long-term sustainability and coastal management objectives.		

The Dun Laoghaire Rathdown County Development Plan 2022-2028 in complying with the requirements of the Habitats Directive, requires that all Projects and Plans that could affect the Natura 2000 sites in the same zone of impact of the Project site would be initially screened for Appropriate Assessment and if requiring Stage 2 AA, that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts. In this way, any in-combination impacts with Plans or Projects for the development area and surrounding townlands in which the development site is located would be avoided.

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6.9 Summary of Key Ecological Receptors (KERS)

Table 12: Ecological evaluation of ecological resources within and surrounding the subject lands

Habitat/Species/Site	Highest Ecological Valuation Level	Key Ecological Receptor inside the ZOI	Rationale
Designated Sites			
European sites	International	No	The Proposed Development is located outside the boundary of all European Designated sites, and there is no potential for direct effects. No impacts to any European Designated site are expected as a result of the proposed Development, Given the nature and small scale of the works and the intervening distance from the site of works to any designated site, in addition to the physical barriers, including the harbour walls, separating the Proposed Development from the nearest designated sites. This was confirmed during an Appropriate Assessment Screening Assessment carried out by the present authors for the Proposed Development. (IDEC (2025)).
pNHAs and Nationally Designated Sites	National	No	The Proposed Development is located outside the boundary of all Nationally Designated sites, and there is no potential for direct effects. For the pNHA's, given the lack of a physical pathway, and the fact that they are designated primarily for habitats, flora and fauna occurring within their boundaries, and will not be subject to habitat loss, disturbance and/or displacement during the construction phase or any of the Development, no impact is envisaged.
Habitats & Flora			
Water Quality	High Local Importance	Yes	The Dun Laoghaire Harbour is adjacent to the site. This is the key environmental receptor surrounding the proposed Development.

Habitat/Species/Site	Highest Ecological Valuation Level	Key Ecological Receptor inside the ZOI	Rationale
Buildings and Artificial Surfaces (BL3)	Low Local Importance	No	Habitat of negligible ecological significance.
Recolonising Bare Ground (ED3)	Low Local Importance	No	Habitat of negligible ecological significance.
Amenity Grassland (GA1)	Low Local Importance	No	The majority of the proposed development area conforms to this habitat type. The species recorded were typical of such habitats, with none protected or of conservation concern. Given the absence of notable flora, the loss of this habitat is not considered significant.
Invasive Species	-	No	No invasive species were recorded in the Third Schedule within or around the development site. Medium impact invasive species, Butterfly bush, was recorded adjacent to the development area within the rock armour. No management actions are required.
Fauna			
Bats	National importance	No	The area of works does not support any mature treeline or hedgerow, offering limited potential foraging and commuting areas for bats. Given the open nature and urban context of the development site, along with the presence of street lighting and the absence of woody or vegetated features, the site is considered low in suitability for bats. Therefore, the impact on bats will be negligible. No roosting habitat was identified with the ZOI. No impacts to any significant linear features will occur.
Otters	National and International importance	No	No evidence of Otter activity was observed during ground surveys of the site or its surroundings in July 2025. Minimal works will occur within areas of potential otter habitat. Works will require a small incursion into the rock armour but are not expected to have any knock-on effects on its stability or integrity. Given the nature and small scale of the proposed

Habitat/Species/Site	Highest Ecological Valuation Level	Key Ecological Receptor inside the ZOI	Rationale
			works, the impact on otters is negligible.
Terrestrial mammals	High Local Importance	No	No other protected mammal species were recorded within the project ZOI.
Breeding Birds	High Local Importance	No	No SCI species were recorded within or surrounding the proposed development area during site surveys in July 2025. All of the birds recorded were typical species seen and heard in coastal and urban settings. No habitat was identified that could serve as a key foraging or roosting habitat for any SCI species. No impacts to breeding birds are expected as a result of the proposed Development.
Cumulative and In Combination Impacts	-	No	A review of the planning websites for both Dun Laoghaire–Rathdown County Council and An Bord Pleanála did not identify any plans or projects that could lead to cumulative or in combination impacts with the proposed Development. Considering that the proposed project has a small-scale, short-term construction phase and an operational phase consistent with the surrounding land use, it is not foreseen that the proposed project will have any significant cumulative impacts with other plans.

7 Ecological Impact Assessment

7.1 Water Quality

The proposed Development is located adjacent to the Harbour, which is of limited ecological value and may support species such as otters, seals, and other marine species at varying times of the year.

7.1.1 Construction Phase Impacts

In the worst-case scenario, there is potential for minor, temporary adverse impacts. Deterioration of water quality arising from the indirect effects of contaminated run-off or discharge into the aquatic environment of the harbour through siltation, nutrient release and/or contamination. The construction phase of the Development will involve site preparation (e.g., earthworks, excavation, etc.). Similarly, the operation and refuelling of machinery during construction can result in hydrocarbon leaks in the absence of mitigation.

7.1.2 Operational Phase Impacts

No operational phase impacts predicted to habitats are predicted.

7.2 Habitats

No Annex I habitats listed under the EU Habitats Directive are present within the study site. No high-impact alien invasive plant species (e.g. Japanese Knotweed) are present on the proposed site.

7.2.1 Construction Phase Impacts

The permanent loss of the dominant habitat, amenity grassland, will occur as a result of the proposed Development. Scattered vegetation within the rock armour adjacent to the works area will also be lost to facilitate the proposed works. Given the absence of notable flora and the negligible ecological significance of the areas, the loss of these habitats is not considered significant. Overall, the anticipated impacts on habitats are considered to be of negligible ecological significance at a local level. Given the common and widespread nature of the affected habitats, their low ecological sensitivity and the absence of protected species, the removal of these features is not considered a significant ecological impact.

7.2.2 Operational Phase Impacts

No operational-phase impacts on habitats are predicted.

8 Avoidance, Mitigation Measure And Compensation

Mitigation is prescribed in accordance with the EPA draft guidance on EIAR (EPA, 2017), which requires mitigation by avoidance as a first approach. Where this is not feasible, measures to prevent impacts from giving rise to adverse effects should be adopted (e.g., design of bunded storage for chemicals). Where impacts cannot be avoided, e.g., noise generation, mitigation is required to reduce effects and limit the receptor's exposure to an acceptable level (often achieved by interrupting the pathway between the source and receptor). The primary parties responsible for implementing these measures include the applicant and the construction team (site manager, project environmental manager, and site operatives).

8.1 Construction phase - Construction Environmental Management Plan (CEMP)

A CEMP should be developed for the Proposed Development. This CEMP should be developed in conjunction with and cognisant of the findings and recommendations of the project AA IDEC (2025) and other ecological documents, including this EcIA. The CEMP outlines the approach to be adopted for environmental management throughout the project works at the site, with the primary aim of reducing and avoiding adverse environmental effects from construction stages, particularly on water quality.

8.1.1 CEMP Objectives

The objectives the CEMP are, therefore, to:

- Act as a continuous link and reference document for environmental issues between the design, construction, testing and commissioning stages of the Project;
- Demonstrate how construction activities and supporting design shall properly integrate the requirements of environmental legislation, planning consent conditions, policy, good practice, and those of the environmental regulatory authorities and third parties;
- Record environmental risks and identify how they will be managed during the construction period;
- Record the objectives, commitments and mitigation measures to be implemented together with the programme of works and date of achievement;
- Identify key staff structures and responsibilities associated with the delivery of the Project and environmental control and communication, and training requirements as necessary;
- Describe the Contractor’s proposals for ensuring that the requirements of the environmental design are achieved, or are in the process of being achieved, during the Contract Period;
- Act as a vehicle for transferring key environmental information at handover to the body responsible for the operational management of the Proposed Development site. This shall include details of the asset, short and long-term management requirements, and any monitoring or other environmental commitments (where required), and

- Provide a review, monitoring and audit mechanism to determine the effectiveness of and compliance with environmental control measures and how any necessary corrective action shall take place (where required).

8.2 Habitat and Flora

- The area of he proposed works will be kept to the minimum, staying within the redline boundary to avoid impacts and minimise disturbance to habitats and flora outside of the works area. The landscaping plan for the proposed Development will include a diverse mixing of flowers, shrubs, and trees, which will improve the site's function for pollinators, inverters and birds above the baseline site condition.

8.3 Water Quality

Groundworks Measures

- Construction works will not be carried out during periods of heavy rainfall to minimise runoff risk as detailed in the description of severe weather events above.
- All water quality control measures will be implemented before any enabling works are carried out on site.
- Stockpiling of excavated material will be temporarily located in a clearly defined and demarcated area, away from the harbour. Stockpiles will be removed regularly to prevent sediment-laden runoff from escaping the site, or they will be surrounded by silt fencing to prevent sediment-laden runoff from reaching sensitive receptors.
- Silt fencing will be installed along the site boundary with the harbour and will remain in place for the duration of the project.
- The silt fences will have the following design features: – the geotextile fabric must be entrenched at least 100mm into the ground with the ends upturned inward towards the works; – the fence posts will have a maximum spacing of 2m to prevent sag on the fence; and – the geotextile fabric will be anchored to the fence posts as opposed to wrapped.
- The site management will inspect silt fences daily to assess the effectiveness of the measures, perform maintenance, and determine if there has been any damage/breach to the control measures. The silt fences will also be inspected immediately after heavy rainfall or strong winds (which trigger a yellow weather warning). Where repair is necessary, this will be carried out immediately and may require the replacement of any damaged/degraded material

Management of potentially polluting materials

- Materials and equipment to implement the Spill Response & Control Plan must be available adjacent to all watercourses (for example, spill kits and booms). These should be clearly marked response points that all staff can access.
- Drip trays will be utilised on-site for pumps and stationary equipment situated on-site, and spill kits will be available at these locations for the duration of the contract. Any used spill kits will be disposed of using a hazardous waste disposal contractor and in accordance with all relevant EU and Irish waste management legislation.
- All hazardous substances on-site shall be controlled within an enclosed storage compound that shall be fenced off and locked when not in use to prevent theft and vandalism.
- Minimal refuelling or maintenance of vehicles or plant will not take place away from the harbour within the site compound or in an appropriately designated area. Vehicles will never be left unattended during refuelling. Only dedicated, trained, and competent personnel will carry out refuelling operations. Plant refuelling procedures, including the measures listed below, shall be detailed in the contractor's method statements.
- Mobile storage tanks such as fuel bowsers will be bunded to 110% capacity to prevent spills. Tanks for bowsers and generators shall be double-skinned. When not in use, all valves and fuel trigger guns from fuel storage containers will be locked
- No washing out of any plant used in concrete transport or concreting operations will be allowed on site. Where concrete is delivered on site, only chute cleaning will be permitted, using the smallest volume of water possible, in an area within the compound as far from the harbour as possible. No discharge of cement-contaminated waters to any drain will be allowed.

8.4 Emergency Response Procedure

Emergency environmental incidents are defined as events that have the potential to harm the environment. These may include, but are not limited to:

- Failure or malfunction of environmental protection systems or mitigation measures;
- Any emission or discharge that is not in compliance with relevant contract conditions, licences, or environmental standards;
- Situations that present a risk of environmental pollution;
- Emergency events that could cause environmental damage, such as large-scale spillages or fires.

During the construction phase of the proposed Development, every effort will be made to prevent pollution

incidents, particularly those resulting from accidental spills of fuel or oil. The presence of machinery and equipment on-site increases the risk of such incidents. Therefore, a clear emergency response procedure must be followed in the event of a spill.

8.4.1 Spill Response Procedure

1. Identify and halt the source of the spill immediately. Alert any personnel working nearby.
2. Inform the Environmental Manager without delay, providing details on the location, nature, and estimated extent of the spill.
3. Eliminate ignition sources in the immediate vicinity, if relevant and safe to do so.
4. Contain the spill using appropriate spill response materials such as absorbents, booms, or track mats. Do not attempt to wash the spill away or allow it to spread.
5. Protect sensitive areas, including nearby drains, streams, or wetland habitats, by bunding or covering them to prevent contamination.
6. Carry out initial clean-up, using spill control materials to recover as much of the pollutant as possible.
7. Secure and properly dispose of all contaminated materials using a licensed waste contractor with appropriate authorisations to prevent secondary contamination.
8. The Environmental Manager will inspect the affected area as soon as practicable to ensure the spill has been contained and remediated, and that measures are in place to prevent recurrence.
9. The Environmental Manager will also notify relevant authorities, which may include Donegal County Council, the National Parks and Wildlife Service, the Department of Environment, Climate and Communications, the Department of Housing, Local Government and Heritage, and/or the Environmental Protection Agency (EPA) as necessary.

Environmental incidents are not limited to fuel or oil spills. Any environmental-related incident must be reported, recorded, and investigated immediately.

In the case of such an incident, the appointed contractor must complete a detailed report, which should include at a minimum:

- A description of the event, including location, type and volume of the contaminant, and likely environmental receptors;
- Identification of contributing factors;
- Any observed or potential negative impacts;
- Actions taken to mitigate the impacts; and

- Recommendations for preventing similar events in the future.

9 Predicted Residual Impacts of the Proposed Development

Following the full implementation of both the mitigation and recommended measures, the residual impacts on biodiversity vary from imperceptible to not significant for the proposed project at the Metals Green.

10 Conclusion

No significant negative impacts on protected habitats or species are predicted arising from the proposed Development. No Annexe I habitats or habitat types of high or higher local ecological value were found within the proposed development site.

No rare, threatened or protected species of plants as per the Red Data List (Wyse Jackson *et al*. 2016) were found. No species listed in the Flora Protection Order (2015) were found to be growing within the site.

The key ecological constraint for the proposed Development is the proximity to Dun Laoghaire Harbour, which connects to Dublin Bay. Through the implementation of the mitigation measures outlined in this EcIA and the CEMP for this project, the Development is not expected to have adverse impacts from the construction or operation of the Proposed Development.

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Appendix 1: Site Photos

Proposed Site of Works, Area of Amenity Grassland	Harbour Road, Adjacent to the Development Site
	

Vegetation Recorded within the Rock Armour Adjacent to the Works Area. Butterfly-bush Recorded.	Proposed Site of Works adjacent to Dublin Bay.