LARGE-SCALE RESIDENTIAL DEVELOPMENT AT GLENAMUCK NORTH, KILTERNAN, DUBLIN 18

Appropriate Assessment Screening Report

Durkan Carrickmines Developments Limited

Report no.: 01, Rev. 02
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1 INTRODUCTION

1.1 Background

DNV was commissioned by Thornton O'Connor, on behalf of Durkan Carrickmines Developments Limited, to prepare an Appropriate Assessment (AA) Screening Report for a Proposed Residential Development, at Glenamuck North, Kilternan, Dublin 18, hereafter referred to as 'Proposed Development' or 'Site', when referring to the application Site area. This report contains information to enable the Competent Authority to undertake Stage 1 AA screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

All reporting has been carried out by qualified and experienced ecologists and environmental consultants. EK, Graduate Ecologist with DNV, undertook the field survey and desktop research components and contributed to authoring this report. SOB, Senior Ecologist, authored this report.

EK has a BSc in Psychology from the University of Maryland, USA and an MSc in Biodiversity and Conservation from Trinity College Dublin. His experience includes desktop research, literature-scoping review, and report writing as well as vegetation surveys, rare species surveys, and habitat mapping. EK has contributed to the preparation of several AA Screenings, Ecological Impact Assessments (EcIA) and EIAR Biodiversity Chapters, as well as Biodiversity Net Gain (BNG) Reports.

SOB has a B.A. in Zoology from Trinity College Dublin and a M.Sc. Hons. in Wildlife Conservation and Management from University College Dublin, and has experience in desktop research, report writing, and literature scoping-review, as well as practical field and laboratory experience (Pollinator surveying, sampling and identification, habitat surveying, invasive species surveying, etc.). SOB has prepared Stage I and Stage II Appropriate Assessment (AA) Reports, Invasive Species Surveys, Ecology Statements, EcIAs, and Biodiversity Chapters of Environmental Impact Assessment Reports (EIARs).

1.3 Description of Proposed Development

1.3.1 Site Location

The Proposed Development is located on a current greenfield site at Glenamuck North, Kilternan, Dublin 18, as seen in Figure 1. The Site is primarily bounded by the recently constructed Glenamuck District Distributor Road (GDDR) to the south and playing pitches to the northwest and northeast. The Glenamuck north stream passes from the south of the Site up through the east of the Site, while a tributary of the Carrickmines stream passes along the north boundary of the Site. The surrounding lands are mainly residential in nature.

1.3.2 Proposed Development Description

Durkan Carrickmines Developments Limited intend to apply for permission for a Large-Scale Residential Development at a site in the townland of Glenamuck North, Kilternan, Dublin 18. The site is generally bounded by: the Glenamuck District Distributor Road (GDDR) to the south, which is recently constructed (to be known as the Kilternan Road); agricultural land to the west; De La Salle Palmerstown Football Club and the future Jamestown Park to the north; and Bective Rangers Football Club to the east.

Road works are proposed to the approved Glenamuck District Roads Scheme (GDRS) (ACP Ref. HA06D.303945) to provide access to the development from the Kilternan Road which will include any necessary tie-ins to the existing footpath and cycle track.

The development will principally consist of the construction of a creche (c. 571 sq m) and 219 No. residential units comprising 69 No. houses (51 No. 3 -bed units and 18 No. 4-bed units), 108 No. apartments (38 No. 1-bed units, 31 No.

2-bed units and 39 No. 3-bed units) and 42 No. duplexes (11 No. 1-bed units, 9 No. 2-bed units, and 22 No. 3-bed units). The Proposed Development will range in height from 2 No. to 4 No. storeys.

The development also provides: car, bicycle and motorcycle parking; bin storage; ancillary storage; private balconies, terraces and gardens; hard and soft landscaping; boundary treatments; lighting; substations; and all other associated site works above and below ground.

The proposed Site layout can be seen in Figure 2.

1.3.2.1 Surface water

As outlined in the Engineering Infrastructure Report and Stormwater Impact Assessment (Roger Mullarkey & Associates, 2026) accompanying this application, there is no known surface water drainage infrastructure within the Site of the Proposed Development, however there is an existing foul water trunk main crossing the Site parallel to the northern side of the Glenamuck Stream but this sewer has been diverted into the GDDR as part of the GDRS roads project and is no longer a live sewer. The recently constructed GDRS project has locally diverted the route of the existing Glenamuck Stream via a new box culvert passing beneath the distributor road and re-connecting with the existing stream path. Similarly, the GDRS has constructed a 2nd culvert at the downstream end of the Site.

The Proposed Development will have 2 no. surface water and 1no. foul water connection outfall points.

The surface water drainage is to be divided into 3 no. catchment areas, namely Catchment B1, Catchment B2, and Catchment B3, all of which will outfall to the Glenamuck stream. It is noted that the GDRS project is currently under construction adjacent to the Site and some of the service connections will be provided by that scheme. It has been stated by Dún Laoghaire-Rathdown County Council (DLRCC) that the GDRS project will be completed in Q1 of 2026. Therefore, the above noted connections will be live and available by the time this Proposed Development requires them, subject to a successful planning application.

The surface water drainage infrastructure for the Proposed Development will collect the rainfall on Site and will treat, attenuate, store and convey the storm water run-off via the proposed Sustainable Drainage Systems (SuDS) before outfalling to the Glenamuck Stream. A full SuDS treatment train approach has been implemented in accordance with the Construction Industry Research and Information Association (CIRIA) SuDS Manual, summarised as follows:

- Bio-Retention areas,
- Filter drains to rear of housing,
- Swales adjacent to roads where practically feasible,
- Tree pits where practically feasible,
- Intensive green roofs,
- Permeable paving to all parking spaces,
- Silt-trap/catchpit manholes,
- Hydrobrake limiting flow to the greenfield rate, and
- Stone lined voided arch retention storage devices.

1.3.2.2 Foul Drainage

As outlined in the Engineering Infrastructure Report and Stormwater Impact Assessment (Roger Mullarkey & Associates, 2026) accompanying this application, the proposed foul water system will have 1 no. outfall connection located in the southeast corner of the Site.

According to the EPA agglomeration zones (EPA, 2026), foul waters from the Proposed Development will be treated in Shanganagh-Bray Wastewater Treatment Plant (WwTP).

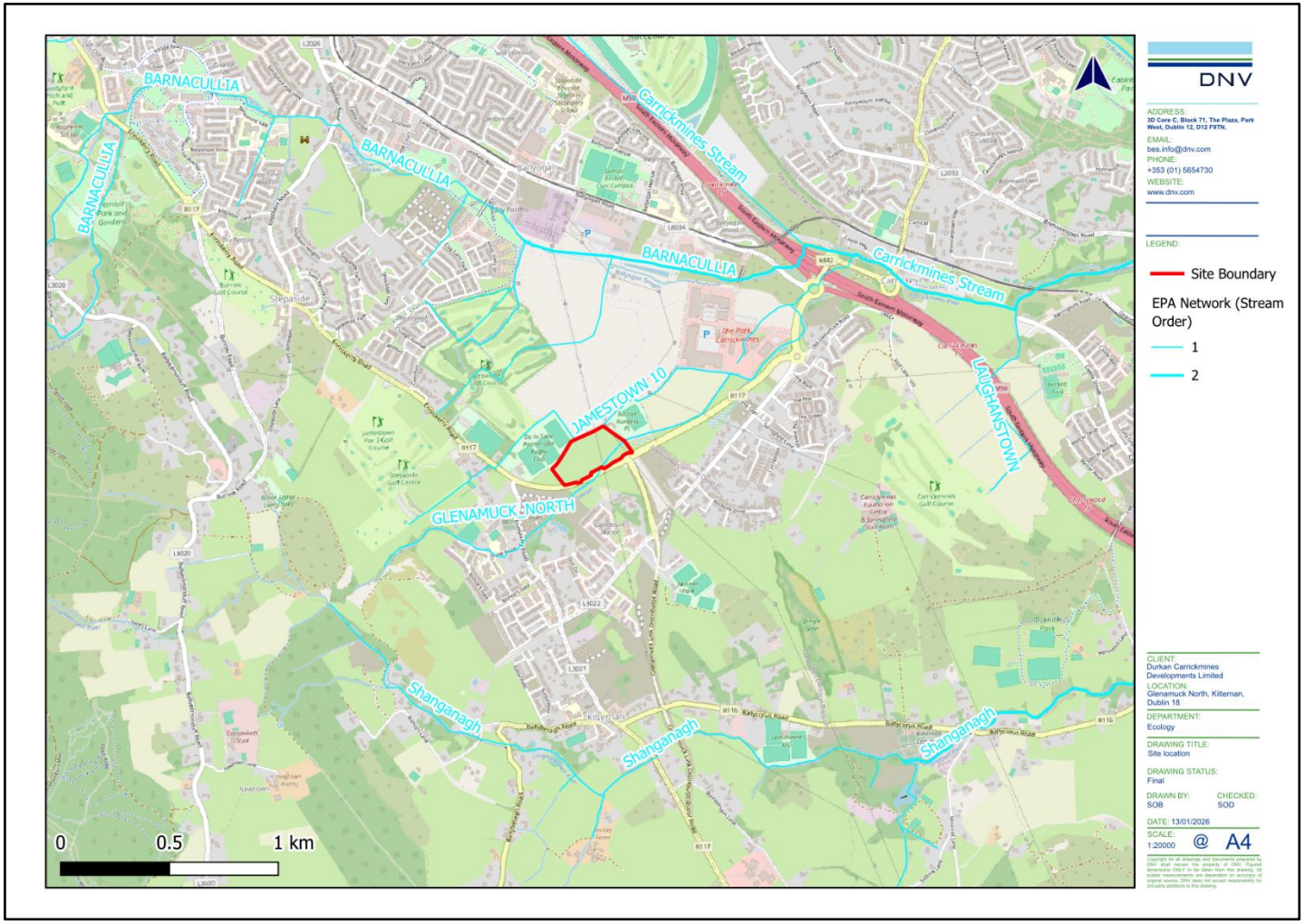

FIGURE 1. SITE LOCATION.

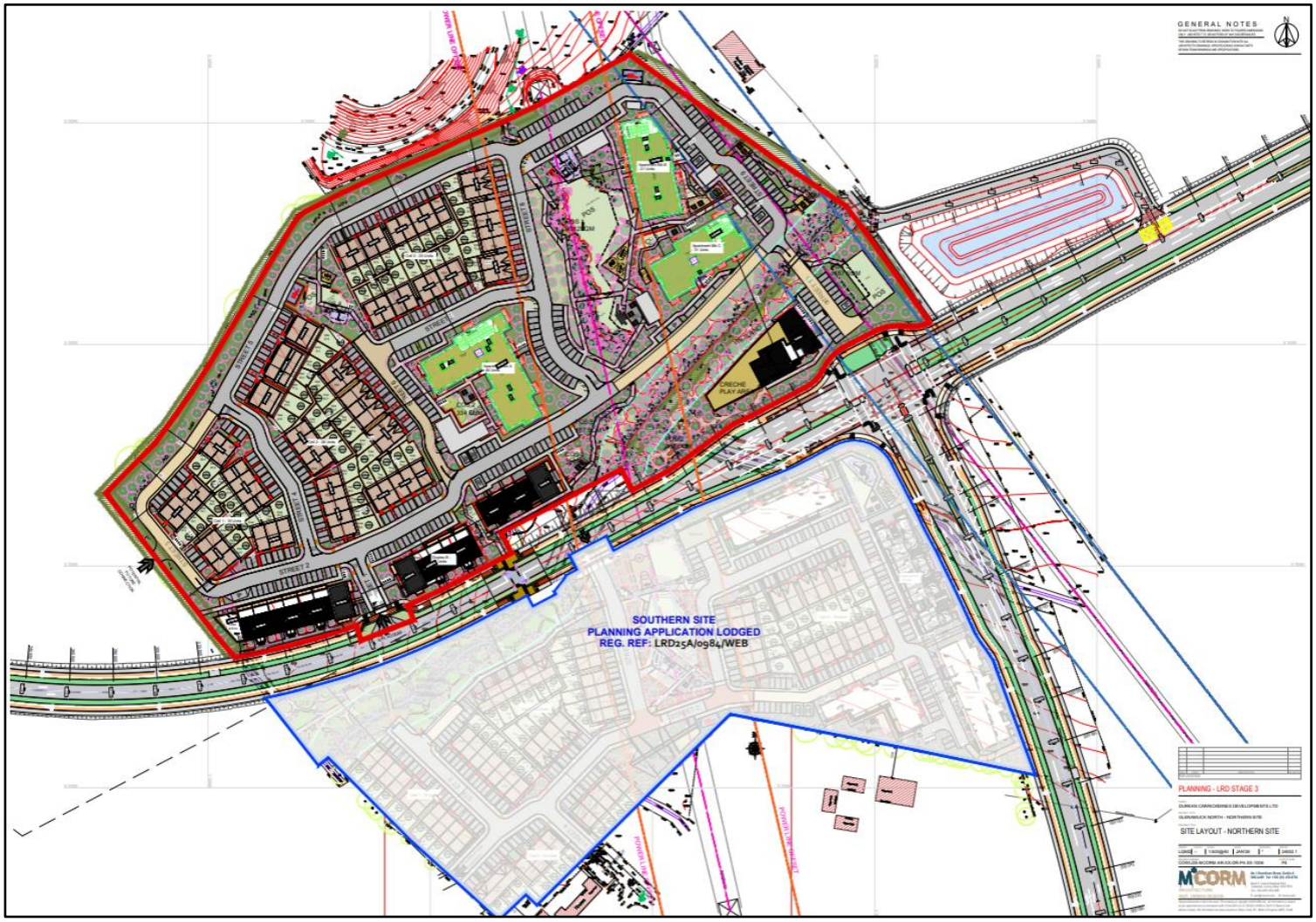

FIGURE 2. PROPOSED SITE LAYOUT. DRAWING NO. COWLDS-MCORM-AR-XX-DR-P4-XX-1006 (MCORM, 2026).

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs). The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011).

It is the responsibility of each Member State to designate SPAs and SACs, both of which will form part of the Natura 2000 Network, a network of protected sites throughout the European Community. These designated sites are referred to as "Natura 2000 sites" or "European sites". SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the sites; from these the conservation objectives of the site are derived.

An AA is a required assessment to determine the likelihood of significant effects, based on best scientific knowledge, of any plans or projects on European sites. A screening for AA determines whether a plan or project, either 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.

This AA Screening has been undertaken to determine the potential for significant effects on relevant European sites. The purpose of this assessment is to determine, the appropriateness, or otherwise, of the Proposed Development in the context of the conservation objectives of such sites.

2.1.1 Legislative Context

The obligations in relation to AA have been implemented in Ireland under the Planning and Development Act 2000 (as amended), and the Planning and Development Act 2024. While the 2024 Act has been signed into law, the Planning and Development Act 2000 (as amended) will continue to apply until repealed and the new provisions commenced by way of Ministerial Order. The phased commencement of the new Planning and Development Act is expected to take place up to early 2026.

The obligations in relation to AA covered within both Acts are summarised below:

- The competent authority must carry out screening for AA for all relevant plans and projects, to determine whether the plan or project, in view of best scientific knowledge, is likely to have a significant effect on any European site;
- Where potential for likely significant effects cannot be ruled out, either as a result of the plan or project alone or in-combination with other plans or projects, or where uncertainty exists, the competent authority must determine that an AA is required. In this case, a more detailed examination of the relevant European sites shall be carried out, and a Natura Impact Statement must be prepared.

For further details on both the 2000 Act (as amended) and the 2024 Act, please refer to irishstatutebook.ie.

2.1.2 Consideration of Embedded Mitigation in AA

With regard to the consideration of embedded mitigation in the Appropriate Assessment process the following is noted. According to the ruling delivered in open court in Luxembourg on 15th June 2023 regarding the interpretation of Article 6(3) of the Habitats Directive 92/43, the Article must be interpreted as meaning that:

"In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site".

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS)), that are incorporated into the design of a proposal or project and which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is not to protect a European site, are permitted for consideration of Operational Phase impacts during the undertaking of AA.

No mitigation measures, being measures intended to avoid or reduce impacts on any European Sites, have been considered in this AA Screening Report.

2.1.3 Relevant Case Law

According to the ruling delivered in open court in Luxembourg on 15th June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

"*In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site*".

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS) in large-scale residential developments), that are incorporated into the design of a proposal or project and which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is not to protect a European site, are permitted for consideration during the undertaking of AA.

2.2 Policy Context

2.2.1 Dún Laoghaire–Rathdown County Development Plan 2022-2028

Policies and objectives of the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028 that are of relevance to this Screening Report are outlined below:

- **GIB11:** Coastal Area Feasibility Study It is a Policy Objective to explore undertaking a comprehensive feasibility study on the recreational potential along the coastal area of the County, which comprehensively addresses recreational impact - including visitor numbers, mapping and surveying of sensitive habitats and species and identification of significant threats on European sites - and which would allow an assessment of any future proposals, alone or in combination, to assess impact on the coastal and marine zone within and adjacent to the County boundary. The Council will explore the possibility of carrying out this study with adjoining and/or coastal Local Authorities and/or other agencies.
- **GIB18:** Protection of Natural Heritage and the Environment It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.
- **GIB19:** It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European Sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.
- **GIB21:** It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.
- **GIB22:** It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected.

Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire-Rathdown Version 2014).

- **GIB23:** It is a Policy Objective to protect the Ecological Network which will be integrated into the updated Green Infrastructure Strategy and will align with the DLR County Biodiversity Action Plan. Creating this network throughout the County will also improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include nondesignated sites.
- **GIB25:** It is a Policy Objective to retain and protect hedgerows in the County from development, which would impact adversely upon them. In addition, the Council will promote the protection of existing site boundary hedgerows and where feasible require the retention of these when considering a grant of planning permission for all developments. The Council will promote the County's hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance. The Council will promote the protection of existing hedgerows when considering a grant of planning permission for all developments.
- **GIB28:** It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).

2.2.2 Dún Laoghaire-Rathdown Biodiversity Action Plan 2021-2025

Dún Laoghaire-Rathdown Biodiversity Action Plan (BAP) 2021-2025 is set out to protect and improve biodiversity, following five main themes:

1. Biodiversity research including climate change adaption and mitigation;
2. Building for Biodiversity;
3. Delivery of the Ecological Network across the Dún Laoghaire-Rathdown;
4. Raising awareness among the public, local communities, and council staff; and,
5. Increased collaboration with stakeholders.

2.3 Stages of Appropriate Assessment

This AA Screening Report (the 'Screening Report') has been prepared by DNV. It considers whether the Proposed Development is likely to have a significant effect on a European site and whether a Stage 2 AA is required.

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.

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

- **Stage 1: *Screening***. The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European 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: *NIS.*** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project

would have an adverse effect on the integrity of any European site(s) despite mitigation, 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.

The Habitats Directive promotes a hierarchy of avoidance, mitigation, and compensatory measures. First the project should aim to avoid any negative effects on European sites by identifying possible effects early in the planning stage and designing the project to avoid such effects. Second, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the project is still likely to result in adverse effects, and no further practicable mitigation is possible, a refusal for planning permission may be recommended. In this case, the project will generally only be considered where no alternative solutions are identified and the project is required for IROPI, or, in the case of priority habitats, considerations of health or safety, or beneficial consequences of primary importance for the environment or to other IROPI. Then compensation measures are required for any remaining adverse effects.

3 AA Screening Methodology

3.1 Guidance

This Screening Report has been undertaken in accordance with the following guidance:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision);
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10;
- *Communication from the Commission on the precautionary principle* (European Commission, 2000);
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019);
- *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* Brussels, 28.10.2021 C (European Commission, 2021); and
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021.*

3.2 Screening Steps

Screening for AA involves the following steps:

- Establish whether the plan or project is directly connected with or necessary for the management of a European site;
- Description of the baseline existing environment at the Site of the Proposed Development;
- Identification of relevant European site(s) potentially affected;
- Identification and description of potential effects on the relevant European site(s);

- Assessment of the likely significance of the effects identified on the relevant European site(s);
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the European site; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

It should be noted that any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site **have not been considered** as part of this Screening Report.

3.3 Desk Study

A desktop study was carried out in January 2026 to collate and review available information, datasets and documentation sources relevant for the completion of this Screening Report. The desktop study relied on the following sources:

- Information on the network of European Sites, boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at *www.npws.ie*;
- Text summaries of the relevant European sites taken from the respective Standard Data Forms (available at *https://natura2000.eea.europa.eu/*) and Site Synopses (available at *www.npws.ie*);
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.*gis.epa.ie*;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at *www.gsi.ie*;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the Dún Laoghaire-Rathdown County Council online planning database (*https://dlrcocouncil.maps.arcgis.com/apps/webappviewer/index.html?id=af21eeb123224c4c877f410139ed1e69*) and the National Planning Database (DHLGH, 2025).

For a complete list of the documents consulted as part of this assessment, see *Section 6 References*.

3.4 Field Surveys

A range of ecological field surveys have been carried out at the Site to date. These are summarised in Table 1. For full details on the methods and results of the fields surveys listed, please refer to the Ecological Impact Assessment (EcIA) accompanying this application under separate cover. All surveys were carried out at the appropriate time of year by suitably qualified ecologists. No limitations to field surveys were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development. Results relevant to this Screening Report have been summarised in section 4.2.2.

TABLE 1. FIELD SURVEYS UNDERTAKEN AT THE PROPOSED DEVELOPMENT SITE.

Survey	Surveyor	Dates
Preliminary Habitat and Invasive Flora Survey	DNV (EK)	26th July 2024
General Fauna Survey	DNV (EK)	26th July 2024
Breeding Bird Scoping Survey	DNV (EK)	26th July 2024
Breeding Bird Surveys	DNV (BMcC)	1st May 2025 29th May 2025

Survey	Surveyor	Dates
		30th June 2025
Preliminary Bat Roost and Habitat Suitability Assessments	DNV (EK)	26th July 2024
Bat Activity Surveys	DNV (BMcC, BL, HON, EK)	24th September 2024 12th June 2025 15th July 2025
Ground Truthing Habitat Survey	DNV (EK)	30th January 2025
Wintering Bird Scoping Survey	DNV (EK)	30th January 2025
Amphibian Survey	DNV (EK)	20th March 2025

3.5 Identification of Relevant European sites

The Zone of Influence (ZOI) for a project is the area over which ecological features may be affected by changes as a result of a development and associated activities. This is likely to extend beyond the development site, for example where there are ecological or hydrological links beyond the site boundaries (CIEEM, 2018). Furthermore, ZOI in relation to European sites is described as follows in the 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021):

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

Thus, to identify the European sites that potentially lie within the ZOI of the Proposed Development, a Source-Path-Receptor (S-P-R) method was adopted, as described in OPR PN01 (OPR 2021). This note was published to provide guidance on screening for AA during the planning process, and although it focuses on the approach a planning authority should take in screening for AA, the methodology is also readily applied in the preparation of Screening Reports such as this.

The relevant European sites were identified based on the following:

- Identification of potential sources of effects based on the Proposed Development description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by SCI bird species outside of their designated SPAs);
- Use of up-to-date GIS spatial datasets for European designated sites and water catchments – downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) to identify European sites which could potentially be affected by the Proposed Development; and
- Identification of potential pathways between the Site of the Proposed Development and any European sites within the ZOI of any of the identified sources of effects.
    - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any European sites.
    - Groundwater, soils, and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any European sites.
    - Air and land connectivity assessed based on Proposed Development details and proximity to European sites.
    - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Defining the likely ZOI based on the identified sources of effects and potential pathways between the Proposed Development and any European sites.

3.6 Assessment of Significant Effects

The conservation objectives of the European sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed Development has the potential to result in likely significant effects (LSEs) on any of the QIs and/or conservation objectives listed for the site.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., "*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*".

The potential for LSEs that may arise from the Proposed Development was considered through the use of key indicators:

- Habitat loss or alteration.
- Habitat/species fragmentation.
- Disturbance and/or displacement of species.
- Changes in population density.
- Changes in water quality and resource.

In addition, information pertaining to the conservation objectives of the European sites, the ecology of the designated habitats and species and known or perceived sensitivities of the habitats and species were considered.

3.7 Limitations

No limitations were encountered which would prevent robust conclusions from being drawn as to the potential impacts of the Proposed Development and therefore the likely significant effects on the European Site, in view of the Site's conservation objectives.

4 STAGE 1 SCREENING ASSESSMENT

4.1 Management of European Sites

The Proposed Development is not directly connected with or necessary to the management of European sites.

4.2 Existing Environment

4.2.1 Desk Study Results

4.2.1.1 Hydrology, Geology and Hydrogeology

The Site of the Proposed Development is located within the Ovoca-Vartry Catchment (Catchment ID: 10) and the Dargle_SC_010 sub-catchment (Sub-catchment ID: 10_5) (EPA, 2026).

Two first order tributaries of the Carrickmines Stream, both mapped by the EPA as Carrickmines Stream_010 (EU Code: IE_EA_10C040350), pass through the north and south boundaries of the Site, namely the Jamestown Stream in the north and Glenamuck Stream to the south. These watercourses intersect 575m northeast of the Site and enter the Carrickmines Stream 1.4km northeast of the Site of the Proposed Development.

The Carrickmines Stream flows east for approximately 3.3km before joining the Shanganagh 4th Order river. The Shanganagh then flows east for 1.7km before discharging into the Southwest Irish Sea at Killiney Bay (HA_10).

The Water Framework Directive (WFD) ecological status of the Carrickmines Stream in the vicinity of the Site (including the Jamestown Stream and the Glenamuck Stream tributaries) is classified as '*Good*' quality for the 2019 – 2024 monitoring period and was '*Not At Risk*' of failing to meet its WFD objectives for the same period.

The Shanganagh River (Shanganagh_010) is classified as being of '*Good*' quality for the 2019 – 2024 monitoring period and was '*Not At Risk*' of failing to meet its WFD objectives for the same period (EPA, 2026). The ultimate receiving waterbody in this network, Southwest Irish Sea (HA_10), was of '*Good'* status for the 2019 – 2024 monitoring period and was considered to be '*Not at Risk*' of not meeting its WFD objectives (EPA, 2026).

The EPA water quality monitoring data for the stations on the Carrickmines Stream located closest to the Site are summarised in Table 2. The reported Q-value results from the most recently available station data in 2024 indicate that water quality in the Carrickmines Stream proximal to the Site is 'Good'.

TABLE 2. EPA MONITORING STATIONS AND ASSIGNED Q VALUES.

EPA Monitoring Station name	Station Code	Location from Site	Distance from Site	Assigned Q value
Carrickmines Stream - u/s Overpass	RS10C040350	Downstream	3.5km E	4 'Good'
Carrickmines Stream - At Commons Road	RS10S010600	Downstream	4.6km E	4 'Good'

The Site of the Proposed Development is situated on the Wicklow (EU Code: IE_EA_G_076) groundwater body. The bedrock aquifer beneath the Site is '*Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones'* and comprises '*Granites & other Igneous Intrusive rocks* (GSI, 2026). The level of vulnerability to groundwater contamination from human activities beneath the Site is '*High*' (GSI, 2026).

The bedrock units underlaying the Site are classified as *8, Granite, granodiorite* which are classified as *Caledonian (Silurian-Devonian)* in age (GSI, 2026). The soil beneath the Site is mapped as Clonroche/Urban (EPA, 2026). The quaternary sediments beneath the Site are *'Till derived from granite'* and *'Tills derived from limestones'* (TGr & TLs; GSI, 2026) while the subsoil beneath the Site is mapped as '*Granite tills'* and *'Granite sands and gravels'* (A; EPA, 2026).

The Waterbody Status for river, groundwater, and coastal water bodies relevant to the Site as recorded by the EPA (2024) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003) are provided in Table 3.

TABLE 3. WFD RISK AND WATER BODY STATUS.

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km) as the crow flies	WFD water body status (2019-2024)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
Carrickmines Stream_010	IE_EA_10C040350	Within Site	0	Good	Not at Risk	Within /Downstream
Shanganagh_010	IE_EA_10S010600	East	3.8	Good	Not at Risk	Downstream
Groundwater Bodies						
Wicklow	IE_EA_G_076	N/A	N/A	Good	At Risk	Underlying GWB
Coastal waterbodies						

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km) as the crow flies	WFD water body status (2019-2024)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Southwest Irish Sea – Killiney Bay (HA_10)	IE_EA_100_0000	East	5.3	Good	Not at Risk	Downstream of Site

4.2.2 Relevant Field Survey results

4.2.2.1 Habitats & Flora

The majority of the Site is composed of Improved Agricultural Grassland (GA1). The Site is bordered on the west and north by Treelines (WL2), and the two fields comprising the main portion of the site are also separated by a treeline. A line of Hedgerow (WL1) exists along the eastern Site boundary. The Glenamuck Stream passes through the south of the Site, while the Jamestown Stream passes along the north boundary of the Site.

No rare or protected flora were observed at the Site during the surveys.

One invasive floral species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (S.I. 477 of 2011) was recorded at the Site, namely giant hogweed (*Heracleum mantegazzianum*). A single plant was noted along the northeastern corner of the central treeline on the initial Site walkover on the 26th July 2024. This individual had been removed by the landowner prior to the Site visit on the 30th of January 2025.

No QI habitats were encountered on or within proximity to the Site of the Proposed Development.

4.2.2.2 Fauna

During the wintering bird scoping survey and the breeding bird surveys, several bird species were observed, however, none of the species observed were target bird species associated with European sites within the ZOI of the Proposed Development. No QI or SCI species associated with any European sites were encountered on Site.

4.3 Identification of Relevant European Sites

4.3.1 Potential Sources of Impacts

The Proposed Development is not directly connected with or necessary to the management of European sites. However, the following elements of the Proposed Development were identified and assessed for their potential to cause likely significant effects on European sites.

Construction Phase (*Estimated duration: 26-28 months*)

- Uncontrolled releases of dust, sediments and/or other pollutants to air due to earthworks;
- Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies or surface water network;
- Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater;
- Waste generation during the Construction Phase comprising soils and construction wastes;
- Increased noise, dust and/or vibrations as a result of construction activity;
- Increased dust and air emissions from construction traffic;
- Increased lighting in the vicinity as a result of construction activity; and
- Increased human presence and activity as a result of construction activity.

Operational Phase *(Estimated duration: Indefinite)*

- Surface water drainage from the Site of the Proposed Development;
- Foul water from the Proposed Development;
- Increased lighting at the Site and in the vicinity emitted from the Proposed Development; and
- Increased human presence and activity at the Site and in the vicinity as a result of the Proposed Development.

4.3.2 Potential Pathways to European Sites

For the above listed potential sources of effects to have the potential to cause likely significant effects on any European site, a pathway between the source of potential effects (i.e., the Site of the Proposed Development) and the receptor is required. Potential impact pathways are discussed in the following sections in the context of the identified impact sources as identified in section 4.3.1.

4.3.2.1 Direct Pathways

Hydrological pathways

Given the location of the Glenamuck Stream and Jamestown Stream within the Site boundary, and given its connection to downstream European sites via the Shanganagh River surface water network, there is some potential for pollutants entering the network via surface water during the Construction and Operational phases to reach European sites in the Southwest Irish Sea, namely Rockabill to Dalkey Island SAC (003000) and Dalkey Island SPA (004172).

A marine buffer of 1.5km exists between the Shanganagh River's discharge point and Rockabill to Dalkey Island SAC (003000), and a marine buffer of 3.1km exists between the Shanganagh River's discharge point and Dalkey Island SPA (004172).

Thus, it is considered that a weak hydrological connection exists between the Proposed Development and these European sites.

Otter (*Lutra lutra*) is known to be present in the Carrickmines and Shanganagh Streams, but do not form a QI population as the nearest SAC designated for otter is the Wicklow Mountains SAC (002122), which is located 5.3km away and has no hydrological pathway to the Site as they are located on separate river systems. Thus, there is no potential for pollutants to reach any QI otter populations and no hydrological connections to this European site.

Hydrogeological pathways

The Site is located within the Wicklow groundwater body (GWB).

According to the GSI Summary of Initial Characterisation for the Wicklow GWB, groundwater within Wicklow GWB discharges to the sea or to surface water bodies. The Groundwater Vulnerability Rating assigned to groundwater beneath the Site is high (EPA, 2026). However, the presence of intervening surface water bodies (e.g., the Carrickmines stream) between the Site and Knocksink Wood SAC (000725) indicates that no groundwater from the Site will reach this European site. Thus, any groundwater pollution from the Proposed Development will travel downstream via surface water networks and will be assessed as part of the hydrological connections between the Proposed Development and European sites.

As a result of the above, there are no potential hydrogeological pathways from the Proposed Development to any European sites and therefore no S-P-R connections exist by hydrogeological means.

Air and Land pathways

No air or land pathways from the Proposed Development to any European sites were identified, as the distance between the Site and the nearest European site (Knocksink Wood SAC (000725) approx. 3.7km southwest) is deemed sufficient to exclude any potential for impacts from increases in noise, lighting and/or dust or other airborne pollutants.

4.3.2.2 Indirect Pathways

Hydrological pathways

According to the EPA Agglomeration areas (EPA, 2026), foul waters from the area of the Site are treated in Shanganagh-Bray WwTP before being discharged into the Irish Sea. The primary discharge point of Shanganagh WwTP is adjacent to Rockabill to Dalkey Island SAC (003000) and separated by approximately 2km from Dalkey Island SPA (004172) within the Irish Sea. Thus, a weak indirect hydrological connection via discharges from Shanganagh WwTP exists to these European sites during the Operational Phase.

However, an Inspector's Report for Shanganagh WwTP (EPA, 2020) references the completion of an AA screening that concludes:

"*the discharges from the agglomeration served by the waste water works, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site*."

Additionally, the most recent Annual Environmental Report (AER) for Shanganagh WwTP (EPA, 2024) states that the WwTP has a capacity of 44,937 Population Equivalents (PE) and is not expected to exceed capacity within the next three years. In addition, the AER states, "the discharge from the wastewater treatment plant does not have an observable impact on the coastal/transitional water quality" and "the discharge from the wastewater treatment plant does not have an observable negative impact on the WFD status". Therefore, foul water loading from the Proposed Development will not have an observable impact on the quality of effluent from Shanganagh WwTP.

Thus, this pathway is deemed weak and insignificant and it can be concluded that there are no connections between the Proposed Development and any European site via foul water discharge.

Air and Land pathways

Ex-situ Habitat Loss

There are no indirect pathways of note via *ex-situ* habitat loss for the following reasons.

The Site does not provide suitable wintering habitat for SCI waterbird species, such as brent goose (*Branta bernicla*), because of the mixed sward height of fields on Site. SCI species of Wicklow Mountains SPA (004040) may forage in fields in the vicinity of the Site. However, due to the agricultural nature of the landscape between the Site and Wicklow Mountains SPA, as well as the baseline disturbance caused by the GDRS construction within the vicinity of the Site, the Site does not provide significant foraging habitat for these species.

Thus, there is no S-P-R connection between the Proposed Development and European sites via *ex-situ* habitat loss.

Collision risk with birds and buildings

The physical location of buildings and structures can influence the likelihood of bird collisions, with structures placed on or near areas regularly used by large numbers of feeding, breeding, or roosting birds, or on a local flight path, such as those located between important foraging and roosting areas, can present a higher risk of collision.

The Site itself is located adjacent to an existing housing development and tall treelines and is not deemed to be located in close proximity or adjacent to any SPAs, with the closest SPA; Wicklow Mountains SPA, located approx. 5.2km to the southwest. As discussed above, there is no significant *ex-situ* feeding/roosting/staging habitat for any SCI species of birds listed for the relevant European sites. Attributes of the Proposed Development further reduce the potential for mortality or injury caused by collision risk, as described below.

Building Height

The Proposed Development will be a max height of 4 storeys. This does not exceed the height of nearby existing housing developments. Birds that commute across the area or in order to reach feeding grounds at various locations would tend to fly above this height and once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds flying in the vicinity of the buildings will simply fly around or over them.

Building Appearance

The overall façades of the proposed structures are well broken up, with areas of glazing dispersed across a varied material composition. The opaque materials proposed provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. The overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is extremely low. These architectural design features are part of the overall design of the Proposed Development and are not included as specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard.

As such, based on the heights of the proposed structures and their physical appearance, it is deemed that birds including SCI species do not face a significant risk of collision with the Proposed Development. While the presence of the Proposed Development might alter flight patterns of bird species in the area slightly to avoid the proposed building structures, the risk of collision is extremely low. Thus, there is no S-P-R pathway for population level effects or change in distribution of any species, including any SCI species for SPAs within the ZoI of the Proposed Development, resulting from increased collisions.

4.3.3 Relevant European sites

A European site will only be at risk from likely significant effects where a S-P-R link exists between the Proposed Development Site and the European site. All European sites considered under the S-P-R method are listed in Table 4.

TABLE 4. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. QUALIFYING INTERESTS (QIS) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (SDF) (EEA, 2026).

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
Special Areas of Conservation (SAC)			
Rockabill to Dalkey Island SAC (003000)	**Conservation Objectives (NPWS, 2013)** **Habitats:** • Reefs [1170] **Species:** • *Phocoena phocoena* (Harbour Porpoise) [1351]	6.7km east	**Construction Phase** A weak direct hydrological connection exists via surface water discharge from the Proposed Development to the Carrickmines Stream and downstream European sites. No other S-P-R pathways of note exist between the Proposed Development and this European site. **Operational Phase** A weak direct hydrological connection exists via surface water discharge from the Proposed Development to the Carrickmines Stream and downstream European sites. No other S-P-R pathways of note exist between the Proposed Development and this European site.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
Knocksink Wood SAC (000725)	**Conservation Objectives (NPWS, 2021)** • Petrifying springs with tufa formation (*Cratoneurion*) [7220] • Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0] • Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0]	3.7km southwest	No pathways identified
Wicklow Mountains SAC (002122)	**Conservation Objectives Version 1.0 (NPWS, 2017)** **Habitats** • 3110 Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) • 3160 Natural dystrophic lakes and ponds • 4010 Northern Atlantic wet heaths with *Erica tetralix* • 4030 European dry heaths • 4060 Alpine and Boreal heaths • 6130 Calaminarian grasslands of the *Violetalia calaminariae* • 6230 Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)* • 7130 Blanket bogs (* if active bog) • 8110 Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*)cu • 8210 Calcareous rocky slopes with chasmophytic vegetation • 8220 Siliceous rocky slopes with chasmophytic vegetation • 91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles **Species** • 1355 Otter (*Lutra lutra*)	5.3km southwest	No pathways identified
Special Protection Areas (SPA)			
Dalkey Islands SPA (004172)	**Conservation Objectives (NPWS, 2022)** • Roseate tern (*Sterna dougallii*) • Common tern (*Sterna hirundo*)	7.4km northeast	**Construction Phase** A weak direct hydrological connection exists via surface water discharge from the Proposed Development to the

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
	• Arctic tern (*Sterna paradisaea*)		Carrickmines Stream and downstream European sites. No other S-P-R pathways of note exist between the Proposed Development and this European site. **Operational Phase** A weak direct hydrological connection exists via surface water discharge from the Proposed Development to the Carrickmines Stream and downstream European sites. No other S-P-R pathways of note exist between the Proposed Development and this European site.
Wicklow Mountains SPA (004040)	**Conservation Objectives Version 1.0 (NPWS, 2024)** • Merlin (*Falco columbarius*) [A098] • Peregrine *(Falco peregrinus*) [A103]	5.3km southwest	No pathways identified

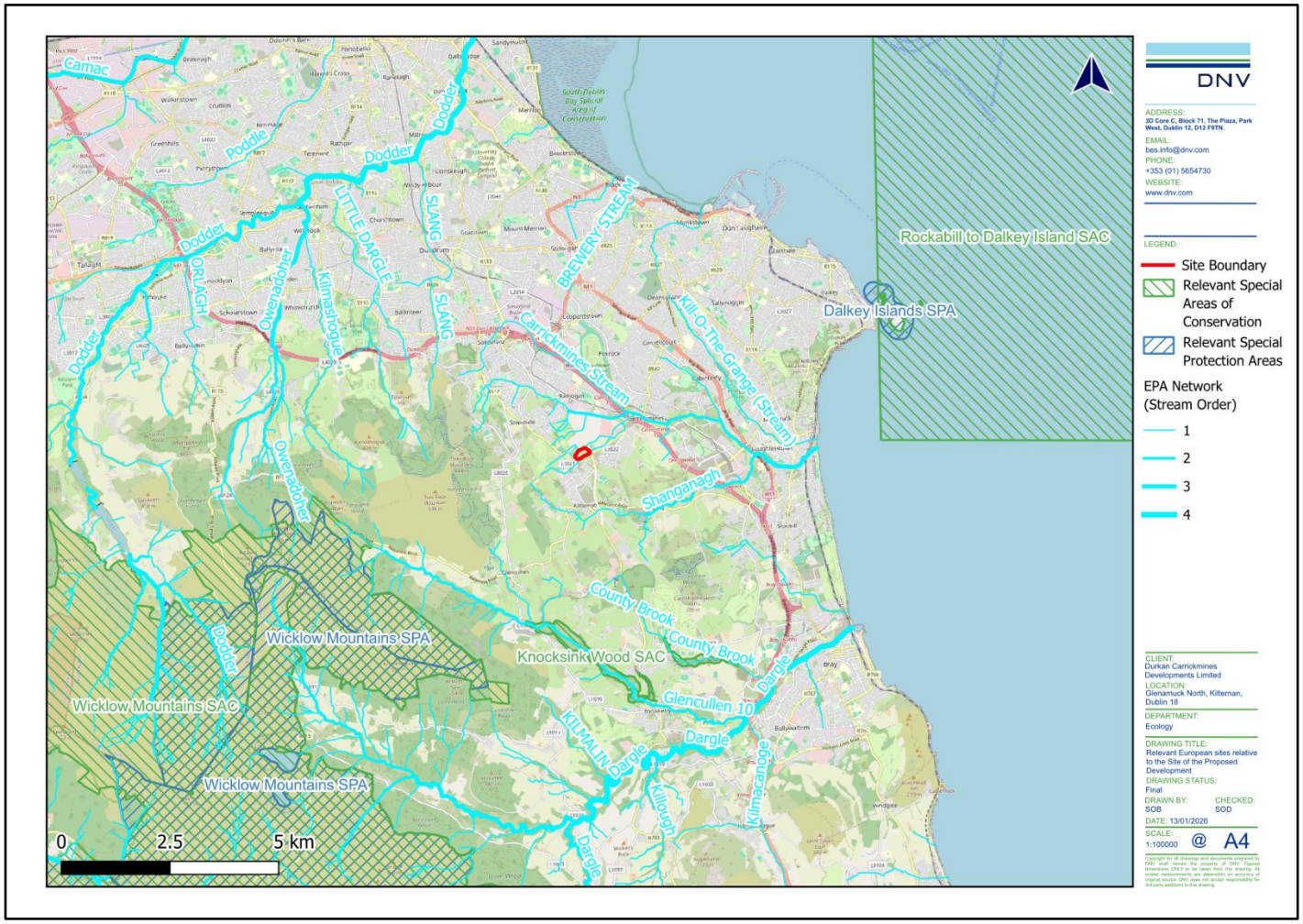

FIGURE 3. LOCATION OF EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT.

4.3.3.1 Rockabill to Dalkey Island SAC (003000)

The following descriptions of the Rockabill to Dalkey Island SAC are extracted from the Site Synopsis (NPWS, 2014) for the site:

> "*This site includes a range of dynamic inshore and coastal waters in the western Irish Sea. These include sandy and muddy seabed, reefs, sandbanks and islands. This site extends southwards, in a strip approximately 7 km wide and 40 km in length, from Rockabill, running adjacent to Howth Head, and crosses Dublin Bay to Frazer Bank in south Co. Dublin. The site encompasses Dalkey, Muglins and Rockabill islands.*
>
> *Reef habitat is uncommon along the eastern seaboard of Ireland due to prevailing geology and hydrographical conditions. Expansive surveys of the Irish coast have indicated that the greatest resource of this habitat within the Irish Sea is found fringing offshore islands which are concentrated along the Dublin coast. A detailed survey of selected suitable islands has shown areas with typical biodiversity for this habitat both intertidally and subtidally. Species recorded in the intertidal included Fucus spiralis, Fucus serratus, Pelvetia canaliculata, Ascophyllum nodosum, Semibalanus balanoides and Necora puber. Subtidally, a wide range of species include Laminaria hyperborea, Flustra folicacea, Alaria esculenta, Halidrys siliquosa, Pomatocereos triqueter, Alcyonium digitatum, Metridium senile, Caryophyllia smithii, Tubularia indivisa, Mytilus edulis, Gibbula umbilcalis, Asterias rubens, and Echinus esculentus. These reefs are subject to strong tidal currents with an abundant supply of suspended matter resulting in good representation of filter feeding fauna such as sponges, anemones and echinoderms.*
>
> *The area selected for designation represents a key habitat for the Annex II species Harbour Porpoise within the Irish Sea. Population survey data show that porpoise occurrence within the site boundary meets suitable reference values for other designated sites in Ireland. The species occurs year-round within the site and comparatively high group sizes have been recorded. Porpoises with young (i.e. calves) are observed at favourable, typical reference values for the species. Casual and effort-related sighting rates from coastal observation stations are significant for the east coast of Ireland and the latter appear to be relatively stable across all seasons. The selected site contains a wide array of habitats believed to be important for Harbour Porpoise including inshore shallow sand and mudbanks and rocky reefs scoured by strong current flow. The site also supports Common Seal and Grey Seal, for which terrestrial haul-out sites occur in immediate proximity to the site. Bottlenosed Dolphins has also occasionally been recorded in the area. A number of other marine mammals have been recorded in this area including Minke, Fin and Killer Whales and Risso's and Common Dolphins.*
>
> *The coastal environment of Co. Dublin is a very significant resource to birds with some nationally and internationally important populations. Of particular note in this site are the large number of terns (Arctic, Common and Roseate) known to use Dalkey Island as a staging area (approx. 2,000) after breeding. Other seabirds commonly seen include Kittiwake, Razorbill, Guillemot, Puffin, Fulmar, Shag, Cormorant, Manx Shearwater, Gannet and gulls.*
>
> *This site is of conservation importance for reefs, listed on Annex I, and Harbour Porpoise, listed on Annex II, of the E.U. Habitats Directive."*

4.3.3.2 Dalkey Islands SPA (004172)

The following descriptions of the Dalkey Islands SPA are extracted from the Site Synopsis (NPWS, 2015) for the site:

> "*The site comprises Dalkey Island, Lamb Island and Maiden Rock, the intervening rocks and reefs, and the surrounding sea to a distance of 200 m. Dalkey Island, which is the largest in the group, lies c. 400 m off Sorrento Point on the Co. Dublin mainland from*

which it is separated by a deep channel. The island is low-lying, the highest point of which (c. 15 m) is marked by a Martello Tower. Soil cover consists mainly of a thin peaty layer, though in a few places there are boulder clay deposits. Vegetation cover is low-growing and consists mainly of grasses. Dense patches of Bracken (Pteridium aquilinum) and Hogweed (Heracleum sphondylium) occur in places. Lamb Island lies to the north of Dalkey Island, and at low tide is connected by a line of rocks. It has a thin soil cover and some vegetation, mainly of grasses, Nettles (Urtica dioica) and Hogweed. Further north lies Maiden Rock, a bare angular granite rock up to 5 m high that is devoid of higher plant vegetation.

This site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Roseate Tern, Common Tern and Arctic Tern.

Dalkey Islands SPA is both a breeding and a staging site for Sterna terns. There is a good history of nesting by terns though success has been variable over the years. Common Tern is the most common species, usually outnumbering Arctic Tern by at least 3:1. Up to 1988, the range given for Common Tern was 15-53 pairs, and for Arctic Tern 'a few' pairs. Also, Roseate Tern attempted nesting in 1986, with 2 pairs recorded. A tern conservation scheme, co-ordinated by BirdWatch Ireland / National Parks and Wildlife Service, began in 1995, with wardening, nestbox deployment and monitoring being carried out. The ultimate aim was to attract Roseate Tern to breed. Numbers of terns increased in subsequent years, though numbers and breeding success is still variable between years. In 2003 62 pairs of Common Tern and 24 pairs of Arctic Tern were recorded. Of great significance is that Roseate Tern has returned, with 5 pairs recorded in 2003 and 11 pairs in 2004 - this is one of only three known sites in the country for this rare species.

The site, along with other parts of south Dublin Bay, is used by the three tern species as a major post-breeding/pre-migration autumn roost area. The site is linked to another important post-breeding/pre-migration autumn tern roost area in Dublin Bay. Birds are present from about late-July to September, with c. 2,000 terns, comprising individuals of all three species, recorded in 1998. The origin of the birds is likely to be the Dublin breeding sites (Rockabill and Dublin Docks) though the numbers recorded suggests that birds from other sites, perhaps outside the State, are also present. The site also has breeding Great Black-backed Gull (7 pairs in 2001), Shelduck (1-2 pairs) and Oystercatcher (1-2 pairs). Herring Gull bred in large numbers in the past but is now very scarce (14 pairs recorded in 1999). The site is known to be frequented in winter by Turnstone and Purple Sandpiper but recent count data are not available. Dalkey Islands SPA is of particular importance as a post-breeding/pre-migration autumn roost area for Roseate Tern, Common Tern and Arctic Tern. The recent nesting by Roseate Tern is highly significant. All three tern species using the site are listed on Annex I of the E.U. Birds Directive."

4.3.3.3 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the relevant European sites are detailed in Table 5 below.

TABLE 5. QUALIFYING INTERESTS (QIS) / SPECIAL CONSERVATION INTERESTS (SCIS) AND THEIR CONSERVATION OBJECTIVES FOR THE RELEVANT EUROPEAN SITES. THE CONSERVATION STATUS OF EACH QI / SCI WAS SOURCED FROM THE RELEVANT STANDARD DATA FORMS (SOURCE: EEA (2026)).

QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
Rockabill to Dalkey Island SAC (003000)		
Reefs [1170]	Good	To maintain the favourable conservation condition of Reefs in Rockabill to Dalkey Island SAC.
Phocoena Phocoena (Harbour Porpoise) [1371]	Good	To maintain the favourable conservation condition of Harbour porpoise in Rockabill to Dalkey Island SAC.
Dalkey Islands SPA (004172)		
Roseate tern (*Sterna dougallii*)	Good	To maintain the favourable conservation condition of these species in Dalkey Islands SPA.
Common tern (*Sterna hirundo*)	Good	
Arctic tern (*Sterna paradisaea*)	Good	

4.4 Assessment of Likely Significant Effects

The following sections discuss the potential for likely significant effects on the relevant European site, taking into consideration the QIs, SCIs and SSCOs (where available), this AA Screening takes these elements into consideration when assessing the potential of significant impacts on European sites as a result of the Development. Furthermore, due consideration shall be given to species not formally identified but which may be present within the relevant European site(s) and adversely effected by the Proposed Development, provided that those potential impacts are likely to affect the conservation objectives of the designated site. The potential for significant effects that may arise from the Proposed Development was considered through the use of key indicators as detailed in section 3.6.

4.4.1 Habitat Loss and Alteration

The Proposed Development is not located within or immediately adjacent to any European sites. Therefore, there is no potential for direct habitat loss or alteration to occur as a result of the Construction or Operational Phases of the Proposed Development.

The potential for indirect loss or alteration of water-dependent QI habitats and the loss of usable habitat for aquatic SCI species is possible, although highly unlikely, through deterioration of water quality and resource. Any such potential impacts are considered in section 4.4.3 below.

4.4.2 Habitat / Species Fragmentation

As the Proposed Development does not have the potential to directly cause habitat loss or alteration, it likewise will not result in direct habitat fragmentation.

The potential for indirect habitat fragmentation through deterioration of water quality and resource is further considered in in section 4.4.3 below.

4.4.3 Changes in Water Quality and Resource

Using the precautionary principle, a weak hydrological connection was identified between the Proposed Development and the following European sites in the Southwestern Irish Sea: Rockabill to Dalkey Island SAC (003000) and Dalkey Island SPA (004172). Thus, pollutants generated during the Construction Phase of the Proposed Development, such as sediment runoff or fuel spill, may have the potential to impact European sites in the Southwestern Irish Sea via the direct hydrological pathway between the Proposed Development and these sites.

The intervening surface water and marine buffer between the Proposed Development and these European sites will dilute any pollutants entering the surface water network from the Site, as surface water from the Site would have to travel 6.5km along the Carrickmines Stream and Shanganagh River prior to discharging into the Irish Sea, with a further 1.5km marine buffer before reaching Rockabill to Dalkey Island SAC (003000) and an additional 1.6km marine buffer prior to reaching Dalkey Island SPA (004172). In addition, as outlined in Table 7-3 of the WFD Assessment (DNV, 2025a) accompanying this application, which focused on potential impacts to the Southwest Irish Sea – Killiney Bay coastal waterbody, it is considered there is no potential for adverse impacts on the biological quality (i.e., habitats or species) of this coastal waterbody, and therefore no specific mitigation measures are required to be put in place to protect this waterbody.

While a suite of best practice measures will be included during the Construction Phase to protect the surface waterbodies within the vicinity of the Proposed Development, though not intended to mitigate impacts to European sites, they will further reduce any pollutants inadvertently released into the surface water network as a result of Construction Phase works.

Furthermore, given the nature of the downstream European sites within the ZoI, no impacts are expected to arise. The QI habitat/species for Rockabill to Dalkey Island SAC (003000) is Reefs [1170], and Harbour Porpoise (*Phocoena phocoena*) [1351], which have an expansive foraging habitat that would not be

significantly impacted by any small amount of pollutants that may enter the Irish Sea as a result of the Proposed Development due to the significant marine buffer. Similarly, Dalkey Island SPA (004172) is designated for cliff-nesting terns whose nesting habitat is on Dalkey Island itself and thus not subject to water quality changes. Terns forage in a range of marine habitats including open marine water, estuaries, and coastal waters, and thus their water resources would not be significantly impacted by the Proposed Development.

Therefore, potential impacts to water quality and resource for the relevant European sites resulting from the Construction Phase of the Proposed Development **can be ruled out**.

During the Operational Phase, surface water will be conducted through a series of embedded SuDS measures (section 1.3.2.1) before being discharged into the existing surface water network (area A) or the Glenamuck stream (area B). The embedded SuDS design includes filtration and attenuation measures such that surface water discharge will not exceed the baseline greenfield runoff rate (section 1.3.2.1). It is expected that upon settlement and interception of collected surface water from the Site, there will be no discharge of pollutants into the surface water network. Additionally, the nearest European site on this hydrological pathway is 8km downstream of the Site in the Irish Sea and thus separated by a significant freshwater and marine buffer. Therefore, there is no likelihood of significant impacts to downstream European sites arising from the Operational Phase of the Proposed Development.

4.4.4 Disturbance and / or Displacement of Species

As outlined in section 4.4.3 above, the hydrological link between the Site and the European sites within the Irish Sea will not result in significant effects on the water quality and resource during both the Construction and Operational Phases. As such, QI/SCI species within the European sites will not be significantly affected by water quality impacts.

The Site of the Proposed Development does not provide any significant suitable *ex-situ* habitat for SCI species of any nearby SPAs and no likely significant effects associated with disturbance or displacement of these SCI species are likely to occur.

4.4.5 Changes in Population Density

As outlined in section 4.4.3 above, the Proposed Development will not have the capacity to cause any significant changes in the population density of any species within European sites in the absence of mitigation.

4.4.6 Potential for In-combination Effects

4.4.6.1 Existing Planning Permissions

A search of planning applications located within the ZoI of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie), Dún Laoghaire–Rathdown County Council and Dublin City Council Planning Applications online map databases. Any planning applications listed as granted or decision pending from within the last five years within 500m of the Proposed Development Site or with a potential connection to the European sites assessed in this Report were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

It is noted that most developments in the vicinity of the Site of the Proposed Development are small scale in nature and include extensions to existing dwellings, construction of single-storey dwellings, and retention of existing developments such as ancillary buildings. Larger developments with the potential to cause in-combination effects with the Proposed Development exist within the 500m buffer and are further considered in Table 6 below.

TABLE 6. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 500 M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
LRD25A/0984/WEB	**Dún Laoghaire–Rathdown County Council**	**Registered Application**	**Immediately south**
Development Description Permission for a Large-Scale Residential Development at a site measuring c. 3.27 Ha in the townland of Glenamuck North in Kilternan, Dublin 18. The site is generally bounded by: the recently constructed Glenamuck District Distributor Road to the north (to be known as the Kilternan Road); the under construction Glenamuck Link Distributor Road to the east (to be known as the Kilternan–Glenamuck Link Road); Glenamuck Manor and a residential dwelling (known as 'Westgate'), its associated outbuildings and wider land holding to the south; and a residential dwelling (known as 'Shaldon Grange') and its wider landholding located to the west. Road works are proposed to the approved Glenamuck District Roads Scheme (ABP Ref. HA06D.303945) to provide access to the development from the Kilternan Road. The Kilternan Road access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of uncontrolled pedestrian and cyclist crossing across the side road junction. A surface water outfall pipe (225 mm) is also proposed to pass through land to the north of the site, including the future Kilternan Road. The total site area including the development site, road works and infrastructure works measures c. 3.32 Ha. The development will principally consist of the construction of 135 No. residential units, comprising 65 No. houses (9 No. 2-bed units, 46 No. 3-bed units and 10 No. 4-bed units) and 70 No. duplex units (21 No. 1-bed units, 22 No. 2-bed units and 27 No. 3-bed units). The proposed development will principally range in height from 2 No. to 4 No. storeys. The development also provides: car, bicycle and motorcycle parking spaces; bin storage; ancillary storage; private balconies, terraces and gardens; hard and soft landscaping; boundary treatments; lighting; substations; and all other associated site works above and below ground. **Potential for in-Combination Effects with the Proposed Development** The WFD Assessment accompanying this application, which assessed potential impacts to downstream the Irish Sea via the Glenamuck Stream, Carrickmines Stream and the Shanganagh River, concluded there is no potential for adverse impacts on the biological quality (i.e., habitats or species) of this coastal waterbody, and therefore no specific mitigation measures are required to be put in place to protect this waterbody. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development should it be granted planning permission.			
LRD25A/0985/WEB	**Dún Laoghaire–Rathdown County Council**	**Registered Application**	**50m southeast**
Development Description Permission for a Large-scale Residential Development (LRD) at a site measuring c.2.8 hectares known as Ashwood Farm located on Glenamuck Road South, Carrickmines, Dublin 18. The site also has direct frontage to the Glenamuck District Distributor Road, which forms the north-west boundary. The development will consist of: i) Demolition of an existing dwelling and removal of a building ruin with a total combined area of 291sq.m; ii) Construction of 144 residential units : A) 70 apartments in a single block, 6-storeys in height, incorporating 35 no. 1-bed units and 35 no. 2-bed units, all with private amenity space in the form of ground level terraces or balconies at upper levels; B) 16 duplexes 3-storeys in height, including 8 no. 2-bed units and 8 no. 3-bed units, all with private amenity space at ground or first floor terraces; and C) 58 houses of 3-storeys in height, including 36 no. 3-bed townhouses and 22 no. 4-bed houses, all with private amenity space in the form of rear gardens and/or second-floor			

terraces; iii) Provision of c.5,015sq.m of public open space, and a communal amenity area of c.607sq.m; iv) Vehicular access to the development will be via the existing access at Glenamuck Road South, and vehicular access will be provided or facilitated to neighbouring properties east of the site; v) The provision of new pedestrian and cycle connections to Glenamuck Road South and the Glenamuck District Distributor Road, as well as a new pedestrian link to the adjoining Willow Glen estate to the east, with potential future pedestrian links to the west also facilitated; vi) A total of 318 bicycle parking spaces and 135 car parking spaces; vii) Provision of surface water attenuation, SuDS measures and connections to facilitate services including to the existing watermain at Glenamuck Road South and to the existing foul drainage network at the Glenamuck District Distributor Road; viii) All associated site and infrastructural works, inclusive of drainage and utilities infrastructure, ESB substation, bike and bin stores, hard and soft landscaping, boundary treatments, internal roads, cycle paths and footpaths, and public lighting.

Potential for in-Combination Effects with the Proposed Development

The AA Screening report for this project states there is no current hydrological pathway to downstream European sites as the Glenamuck Stream is separated from this project site by the GDDR. The AA Screening notes there will be an indirect hydrological surface water pathway following the connection to the GDDR surface water network and subsequently the Glenamuck stream as part of the project's drainage scheme. However, following onsite attenuation, surface water from the Site would have to travel 6.5km along the Carrickmines Stream and Shanganagh River prior to discharging into the Irish Sea, with a further 1.5km marine buffer before reaching Rockabill to Dalkey Island SAC (003000) and an additional 1.6km marine buffer prior to reaching Dalkey Island SPA (004172). Given these distances, any silt, dust, or pollutants that may enter the surface water network will settle, be dispersed, or diluted within the marine environment. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development should it be granted planning permission.

D25A/0794/WEB	**Dún Laoghaire–Rathdown County Council**	**Registered Application**	**360m southwest**

Development Description

Permission for a new detached sports related building comprising a steel structure clad externally, containing 5 new indoor padel tennis courts with associated toilets, storage and small office on entry to the building, new onsite waste water treatment system serving the building and all associated site development works.

Potential for in-Combination Effects with the Proposed Development

This development shares no hydrological pathways with the Proposed Development as the surface water from this project will be re-used onsite and foul water will also be treated onsite. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development should it be granted planning permission.

ABP-306160-19	**An Coimisiún Pleanála**	**Grant Permission**	**280m south**

Development Description

Demolition of 'Greenmount' and 'Dun Óir', construction of 197 no. residential units (62 no. houses, 135 no. apartments) and associated site works.

Potential for in-Combination Effects with the Proposed Development

The Hydrological and Hydrogeological Risk Assessment Report for this project assessed potential impacts to downstream European sites in the Irish Sea via the Glenamuck Stream, Carrickmines

Stream and the Shanganagh River. This report found "*in applying the precautionary principle and assessing a worst-case scenario there is no identified potential negative impact associated with the Proposed Development on the closest hydraulically connected Natura 2000 sites and other protected and designated sites in particular the Rockabill to Dalkey Island SAC and Dalkey Island SPA*", with the AA Screening for this project reaching the same conclusion. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development.

D21A/0143	**Dún Laoghaire–Rathdown County Council**	**Grant Permission**	**Immediately east**

Development Description

Permission is sought for development consisting of the demolition of the existing residential dwelling and associated outbuildings including the glasshouses and existing ruins with permission also sought for site clearance works including removal of existing spoil, tanks, walls and timber fences and all associated site works necessary to facilitate the development.

Potential for in-Combination Effects with the Proposed Development

No potential for in-combination effects. The AA Screening Report for this project concluded there would be no potential for significant effects to any European sites. In addition, based on satellite imagery, it appears the works for this project have been completed. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development.

APB-314057-22	**An Coimisiún Pleanála**	**Grant Permission**	**365m southeast**

Development Description

Permission for residential development of 4 no. units, to comprise (a) demolition of part existing house and shed, (b) alterations to the remaining existing detached single storey house including new fenestration, (c) construction of 1 no. further detached single storey house and 2 no. semi-detached two storey houses, and (d) associated site works including on-site surface water attenuation, utility service connections on Glenamuck Road, closing on existing gateway and provision of new cul-de-sac roadway from Glenamuck Road, car parking, boundary walls and fences, and landscaping.

Potential for in-Combination Effects with the Proposed Development

No potential for in-combination effects. The AA Screening Report for this project concluded there would be no potential for significant effects to any European sites. In addition, the proposed works are relatively minor, and the Site is located almost 6.5km from the closest European site within the Irish Sea. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development.

LRD24A/0718/WEB	**Dún Laoghaire–Rathdown County Council**	**Grant Permission**	**20m south**

Development Description

P Lonergan and Sons Limited intends to apply for permission for a Large-Scale Residential Development comprising amendments to a previously permitted Strategic Housing Development (An Bord Pleanála Ref. 312214-21) with a total application site area of c.3.32Ha (with a substantive residential site development area of c. 2.96Ha), on lands located off Enniskerry Road (R117), Kilternan, Dublin 18, principally bounded by existing undeveloped land to the north and east; the adjoining Shaldon Grange residential property and associated lands (Protected Structure) to the south and

Enniskerry Road to the west. The application site also includes limited frontage to Glenamuck Road to the south-east.

The proposed development consists of internal and external modifications to the 4 no. apartment blocks (Blocks A, B, C, and D), all located in the northern portion of the subject site, as granted under An Bord Pleanála Ref. 312214-21, comprising: Provision of additional storey at each block (resulting in a maximum height of 5 storeys at these 4 no. blocks) each containing 3 no. new units at new Fourth Floor Level; Amendments to permitted Third Floor layout at each block, to provide 1 no. additional unit at this floor in each block; Minor amendments to layout of Ground Floor to Third Floor Levels including alterations to main entrances, terraces/balconies, location of lift shaft, introduction of smoke shaft, and all associated rationalisation of internal arrangements; Changes to floor-to-ceiling height at each floor; Modifications to elevations (including amendments to opes, materials, and finishes); Revisions to roof arrangement to facilitate the provision of PV panels; Amendments to site layout plan including minor reorientation of blocks and revised cycle and car parking arrangements; and all associated ducting, cabling, site lighting, hard and soft landscaping, changes in levels, and site development works above and below ground.

The proposed 16 no. new apartment units (8 no. 1-bedroom and 8 no. 2-bedroom units) will be in addition to the 130 no. units previously permitted under An Bord Pleanála Ref. 312214-21, resulting in 146 no. residential units in total within the scheme (130 no. permitted units + 16 no. new proposed units).

The proposed amendments also result in an overall revised unit mix comprising 36 no. 1-bedroom, 60 no. 2-bedroom, 11 no. 3-bedroom units, 25 no. 4-bedroom units, and 14 no. 5-bedroom units.

The total gross floor area will increase from c. 16,394 sqm to c. 17,816 sqm as a result of the proposed amendments.

Potential for in-Combination Effects with the Proposed Development

No potential for in-combination effects. The AA Screening Report for this project concluded there would be no potential for significant effects to any European sites. In addition, based on satellite imagery, this project is well progressed, with the proposed amendments outlined above not considered a significant diversion from the parent application to alter the conclusion of the AA Screening undertaken for this project. As such, and accounting for the lack of potential effects from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development.

4.4.6.2 Relevant Policies and Plans

The local policies and plans detailed in section 2.2 above were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA, and where potential for likely significant effects have been identified (e.g., in the case of the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028), an NIS has been prepared which identifies appropriate mitigation. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development. The Dún Laoghaire-Rathdown County Development Plan 2022 – 2028 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

TABLE 7. SUMMARY OF IMPACT ASSESSMENT ON EUROPEAN SITES AS A RESULT OF THE PROPOSED DEVELOPMENT.

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
Rockabill to Dalkey Island SAC (003000)	No	No	No	None	None	None	NO
SPA							
Dalkey Islands SPA (004172)	No	No	No	None	None	None	NO

5 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at Glenamuck North, Kilternan, Dublin 18 has been assessed taking into account:

- The nature, size and location of the proposed works and possible impacts arising from the construction works.
- The QIs and conservation objectives of the European sites
- The potential for in-combination effects arising from other plans and projects.

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:

- Rockabill to Dalkey Island SAC (003000)
- Dalkey Islands SPA (004172)

In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required.

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