

AtkinsRéalis



Appropriate Assessment Screening Report

Shankill Property Investments Limited

June 2025

0118265DG0001

SEA GARDENS PHASE 1 BLOCK A

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1. Introduction

AtkinsRéalis have been commissioned by Shankill Property Investments Limited to prepare an Appropriate Assessment (AA) Screening Report for the Sea Gardens Phase1 Block A, hereafter referred to as the proposed development.

This report comprises the AA Screening Report for the proposed development and is intended to assist Dún Laoghaire Rathdown County Council, as the competent authority in this case, in making its determination as to whether or not AA is required in respect of the proposed development.

The proposed development is located on a site at the former Bray Golf Club Lands off the Dublin Road, Bray, Co. Dublin. The proposed development extents and redline boundary are highlighted on the map below as shown in Figure 1-1. The proposed development within the context of the wider Sea Gardens Masterplan lands is shown in Figure 1-2.

1.1 Development Description

The proposed development comprises of a residential development on a site at the former Bray Golf Club Lands off the Dublin Road, Bray, Co. Dublin. The development will complete Phase 1 of the wider Sea Gardens development – the first part of which (Shoreside Park as permitted under ABP-311181-21) is nearing completion and occupation.

The c. 1.38 hectare site is generally bounded to the north by existing public open space at Corke Abbey Valley Park, to the east by the Irish Rail Dublin-Wexford/Rosslare main rail line, to the south by undeveloped lands and to the west by Shoreside Park.

The proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of: 9 no. 4-bedroom, 3 and 4-storey terraced houses with associated private gardens / terraces; and 150 no. apartments in 2 no. blocks ranging in height from 6 to 10-storeys (Block A1) and 7 to 11-storeys (Block A2) and consisting of a total of 48 no. 1-bedroom units, 58 no. 2-bedroom units, 44 no. 3-bedroom units, all with private balconies or terraces. The blocks will also include communal lounge areas; a communal gym in Block A1; refuse storage areas; and associated plant. The shared 2-level podium will include car, motorcycle and bicycle parking, with additional car parking provided within the curtilage of 5 no. of the proposed townhouses. The proposed development will also include: public open space including play areas; communal open space within the central podium courtyard; pedestrian / cycle linkages with adjoining existing and permitted developments; associated connections to the surrounding road network; all associated landscaping and public lighting; an ESB substation; drainage arrangements; utility connections; and all site development works. A detailed development description is set out in the Planning Report prepared by RPS and enclosed as part of the LRD application package.

The proposed design for Block A is shown in Figures 1-3 - 1-5.





Figure 1-1 - Site Location



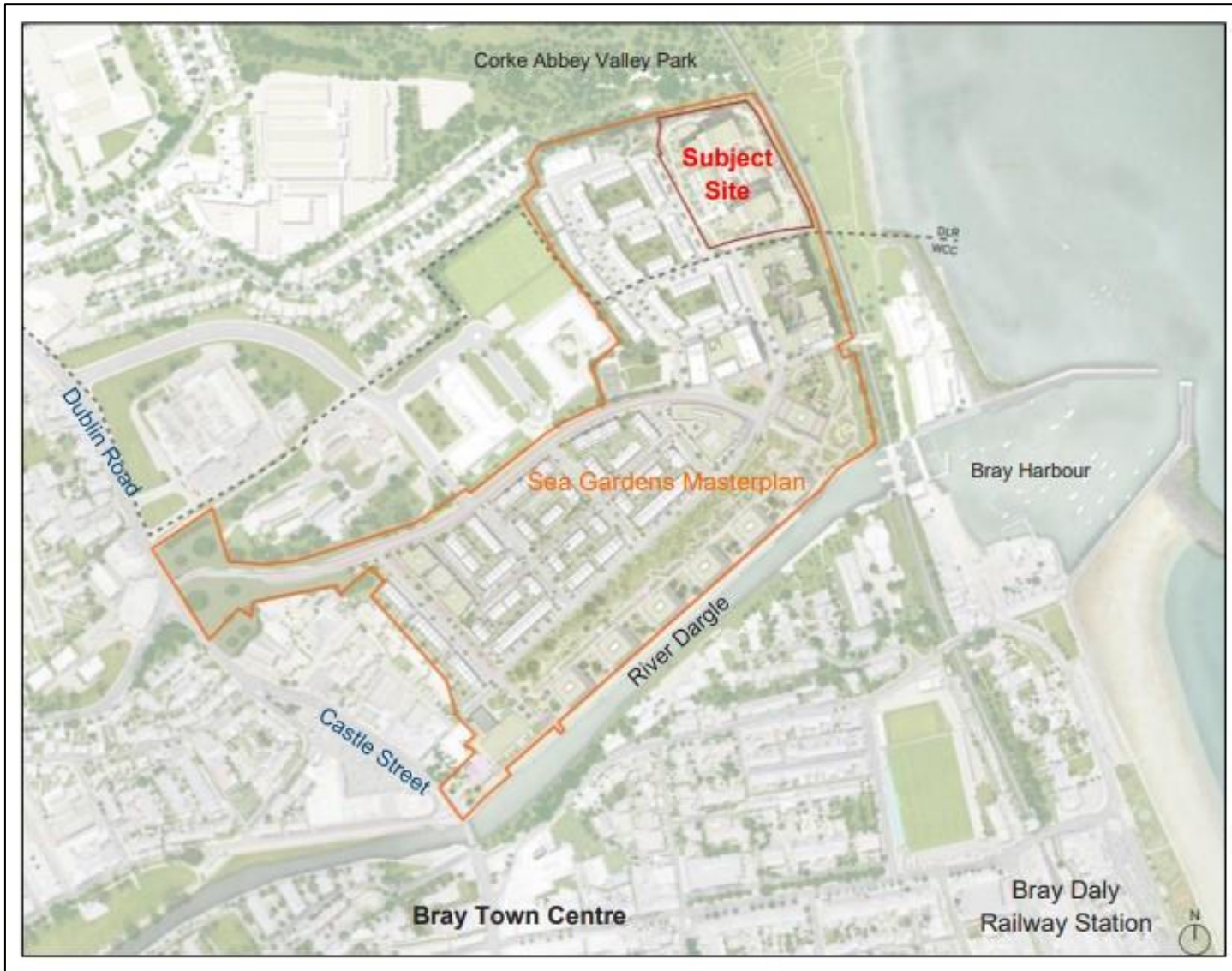


Figure 1-2 - Proposed development within Sea Gardens Masterplan.





Figure 1-3 - Proposed Site Layout



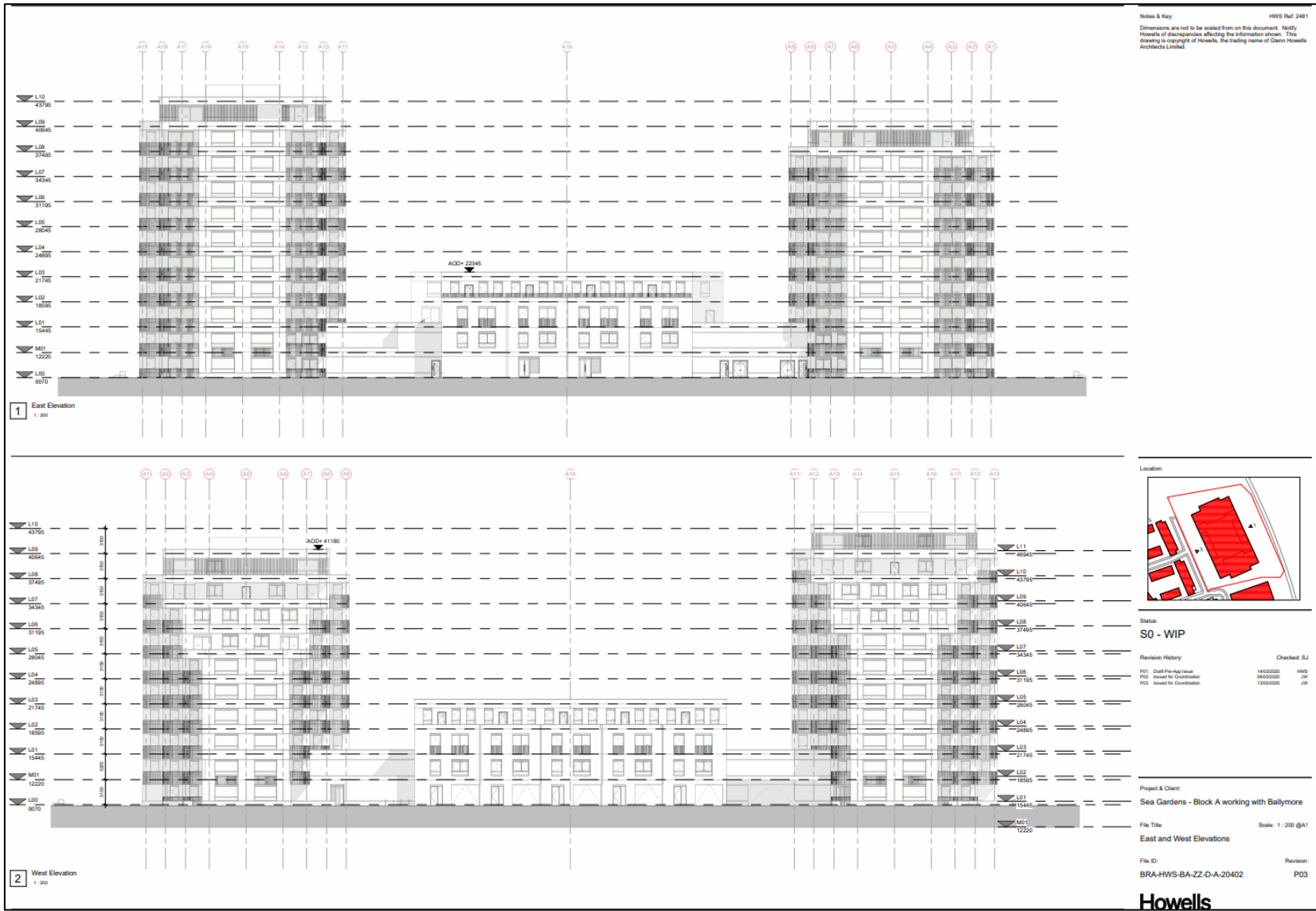


Figure 1-4 - Block A East and West Elevations



1.2 Surface Water Drainage

Surface water drainage infrastructure for the proposed development site has already been constructed as part of the adjoining Sea Gardens Shore Park residential development as permitted under ABP–311181-21. The system employs SuDS techniques including:

- Swales within Open Space / Park areas adjacent to roads
- Permeable paving in light traffic areas (parking bays)
- Green roofs to suitable apartment blocks
- Green courtyards to suitable apartment blocks
- Green corridors / park areas
- Sealed underground concrete attenuation tank
- Filter drains in rear gardens
- Tree pits

1.3 Foul Water Drainage

The foul drainage network for Block A will be designed in compliance with UÉ Code of Practice for Wastewater Infrastructure UÉ-CDS-5030-03, Standard Details UÉ-CDS-5030-01. The main foul drainage within the site road network for the Sea Gardens Masterplan site has been constructed as permitted under ABP–311181-21.

Foul water from the proposed development will connect to the local foul water network as detailed above, with final treatment to be at Shanganagh Wastewater Treatment Plant (WwTP). The Shanganagh WwTP has recently been subject to an upgrade and as such has the capacity to accept the additional foul water the proposed housing development would generate. Uisce Éireann has confirmed that the plant has capacity to adequately process the additional input from the operational demand presented by the proposed development.

1.4 Construction Methodology

The following text outlines the program of works for the construction of the Sea Gardens Phase 1 Block A Large Residential Development (LRD), including the scheduling of activities to be carried out during the construction period. The program shall be designed to ensure efficient project execution while minimizing disruptions to traffic and nearby stakeholders.

Throughout the construction of the proposed development all works will comply with the relevant legislation, construction industry guidelines and best practice to avoid and minimise adverse environmental effects.

A Construction Environmental and Management Plan (CEMP) will be prepared by the Contractor and agreed with Dún Laoghaire-Rathdown County Council before commencement of the project.

Construction working hours will be the standard working hours as follows:

- 8:00am to 6:00pm Monday to Friday;



- 9:00am to 1:00pm on Saturdays; and,
- No work on Sundays and Public Holidays.

Plant/machinery expected to be used during construction include heavy excavators, piling rigs, smaller excavators, dumpers, mobile cranes, and tower crane.

Materials expected to be used during construction include piling mat, Continuous flight auger (CFA) piled foundations with in-situ reinforced concrete structural frame up to and including podium transfer slab, drainage and services, Precast reinforced concrete superstructure, brick external leaf, with Steel Framing System (SFS) metal or concrete wall infill for internal leaf, Scaffolding and Internal party walls will be Reinforced Concrete (RC), other walls SFS metal drylined.

The Construction period for the proposed development is anticipated to be 22 months and can be briefly summarised as follows.

- Enabling works including piling mat installation, all completed using heavy excavators.
- Substructure works include CFA piled foundations with in-situ reinforced concrete structural frame up to and including podium transfer slab. All constructed using piling rig, smaller excavators, dumpers and mobile cranes.
- Civil works including drainage and services installed in parallel with substructure.
- Precast reinforced concrete superstructure frame up to roof level constructed primarily using tower crane.
- Facade build up comprising of brick external leaf, with SFS metal or concrete wall infill for internal leaf. Scaffolding around perimeter to build.
- Internal party walls will be RC, other walls SFS metal drylined.
- External landscaping completed last with small excavators and dumpers.

The phasing timeline for the project is as follows;

- Enabling works: Months 1-3
- Substructure: Months 4-6
- Superstructure: Months 7-9
- Envelope/Facade: Months 10-15
- Landscaping: Months 16-19,
- Interior Fitout: Months 13-18,
- Commissioning: Months 19-21
- Handover PC: Month 22.

The proposed location of the site compound is to the west of the site and can be seen in red below in Figure 1-5.





Figure 1-5 - Site Compound Location



2. Scope of Study

2.1 Legislative Context

2.1.1 Natura 2000

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (“the Habitats Directive”) is a legislative instrument of the European Union (EU) which provides legal protection for habitats and species of Community interest. Article 2 of the Directive requires the maintenance or restoration of such habitats and species at a favourable conservation status, while Articles 3 to 9, inclusive, provide for the establishment and conservation of an EU-wide network of special areas of conservation (SACs), known as Natura 2000, which also includes special protection areas (SPAs) designated under Article 4 of Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (“the Birds Directive”). Both SACs and SPAs are commonly referred to as “Natura 2000 sites” or “Natura 2000 sites”.

SACs are selected for natural habitat types listed on Annex I to the Habitats Directive and the habitats of species listed on Annex II to the Habitats Directive. SPAs are selected for species listed on Annex I to the Birds Directive, other regularly occurring migratory species and other species of special conservation interest. The habitats and species for which a Natura 2000 site is selected are referred to as the “*qualifying interests*” of that site and each is assigned a “*conservation objective*” aimed at maintaining or restoring its “*favourable conservation condition*” at the site, which contributes to the maintenance or restoration of its “*favourable conservation status*” at national and European levels.

2.1.2 Appropriate Assessment

Article 6 of the Habitats Directive deals with the management and protection of Natura 2000 sites. Articles 6(3) and (4) set out the decision-making process, known as “*Appropriate Assessment*” (AA), for plans or projects in relation to Natura 2000 sites. Article 6(3) states: -

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

The first sentence of Article 6(3) provides a basis for determining which plans and projects require AA, i.e., those “*not directly connected with or necessary to the management of [one or more Natura 2000 sites] but likely to have a significant effect thereon, either individually or in combination with other plans or projects*”.

In *Waddenzee* (C-127/02), the Court of Justice of the European Union (CJEU) ruled that significant effects must be considered “*likely*” if “*it cannot be excluded, on the basis of objective information*”, that they would occur. This clearly sets a low threshold, such that AA is required wherever there is a reasonable possibility of significant effects on a Natura 2000 site. In the same judgment, the CJEU established that the test of significance relates specifically to the conservation objectives of the site concerned, i.e., “*significant effects*” are those which, “*in the light, inter alia, of the characteristics and specific environmental conditions of the site*”, could undermine the site’s conservation objectives.

In addition to the effects of the plan or project on its own, the combined effects arising from the plan or project under consideration and other plans and projects must also be assessed (see Section 7.1 for more details).



The last part of the first sentence of Article 6(3) defines AA as an assessment of the “*implications* [of the plan or project] *for the site in view of the site’s conservation objectives*”. In the second sentence, Article 6(3) requires that, prior to agreeing to a plan or project, the competent authority must “*ascertain*” that “*it will not adversely affect the integrity of the site concerned*”. In *Sweetman v. An Bord Pleanála* (C-258/11), the CJEU ruled that a plan or project “*will adversely affect the integrity of that site if it is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site in the list of sites*”. On that basis, EC (2018) described the “*integrity of the site*” as “*the coherent sum of the site’s ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated*”. As such, the “*integrity*” of a specific site is defined by its conservation objectives and is “*adversely affected*” when those objectives are undermined. In *Waddenzee*, the CJEU ruled that the absence of adverse effects can only be ascertained “*where no reasonable scientific doubt remains*”.

The “*precautionary principle*” applies to all of the legal tests in AA, i.e., in the absence of objective information to demonstrate otherwise, the worst-case scenario is assumed. Where the tests established by Article 6(3) cannot be satisfied, Article 6(4) applies (see explanation in Section 2.2 below).

2.1.3 Competent Authority

The requirements of Articles 6(3) and (4) are transposed into Irish law by, inter alia, Part 5 of the European Communities (Birds and Natura Habitats) Regulations, 2011 (as amended) (“the Habitats Regulations”) and Part XAB of the Planning and Development Act, 2000 (as amended) (“the Planning and Development Acts”). As per the second sentence of Article 6(3), it is the “*competent national authorities*” who are responsible for carrying out AA and, by extension, for determining which plans and projects require AA. The competent authority in each case is the body responsible for authorising a plan or project, e.g. local or other public authorities (including TII), An Bord Pleanála, the Environmental Protection Agency (EPA) or a Government Minister. In all cases, it is the competent authority who is ultimately responsible for determining whether or not a plan or project requires AA and for carrying out the AA, where required.

2.2 Appropriate Assessment Process

The AA process can be described as being made up of three distinct stages, as described below, the need to progress to each stage being determined by the outcome of the preceding stage.

Stage 1: Screening – This stage involves a determination by the competent authority as to whether or not a given plan or project required AA. As explained in Section 2.1, AA is required in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site, but for which the possibility of likely significant effects on one or more Natura 2000 sites cannot be excluded. The CJEU’s Judgment on *Eco Advocacy v. An Bord Pleanála* (C-721/21) and the *Opinion* of Advocate General Kokott in the same case set out the principles for identifying any aspects of a plan or project which may constitute what the CJEU termed in *People Over Wind* (C-323/17) “*measures intended to avoid or minimise harmful effects on a Natura 2000 site*” and, as such, cannot be taken into account in making an AA Screening determination. Consideration of the potential for in-combination effects is also required at this stage.

Stage 2: Appropriate Assessment – This stage involves a detailed assessment of the implications of the plan or project, individually and in combination with other plans and projects, for the integrity of the Natura 2000 site(s) concerned. This stage also involves the development of appropriate mitigation to address any adverse effects and an assessment of the significance of any residual impacts following the inclusion of mitigation. In *Kelly v. An Bord Pleanála* (IEHC 400), the High Court ruled that a lawful AA must contain complete, precise, and definitive findings based on examination and analysis, and conclusions and a final determination based on an evaluation of the findings. In the same judgment, the High Court stressed that, in order for the findings to be complete, precise, and definitive, the AA must be carried out in light of best scientific knowledge in the field and cannot



have gaps or lacunae. In *Holohan v. An Bord Pleanála* (C-461/17), the CJEU clarified that AA must “*catalogue the entirety of habitat types and species for which a site is protected*” (i.e. the qualifying interests of the site) and assess the implications of the plan or project for the qualifying interests, both within and outside the site boundaries, and other, non-qualifying interest habitats and species, whether inside or outside the site boundaries, “*provided that those implications are liable to affect the conservation objectives of the site*”. The proposer of a plan or project requiring AA is furnishes the competent authority with the scientific evidence upon which to base its AA by way of a Natura Impact Statement (NIS) or Natura Impact Report (NIR). If it is not possible to ascertain that the plan or project will not adversely affect one or more Natura 2000 sites, authorisation can only be granted subject to Article 6(4).

Stage 3: Article 6(4) – If a plan or project does not pass the legal test at Stage 2, alternative solutions to achieve its aims must be considered and themselves subject to Article 6(3). If no feasible alternatives exist, authorisation can only be granted where it can be demonstrated that there are imperative reasons of overriding public interest (IROPI) justifying its implementation. Where this is the case, all compensatory measures must be taken to protect the overall coherence of Natura 2000.

The three stages described above are illustrated in Figure 2-1 below.



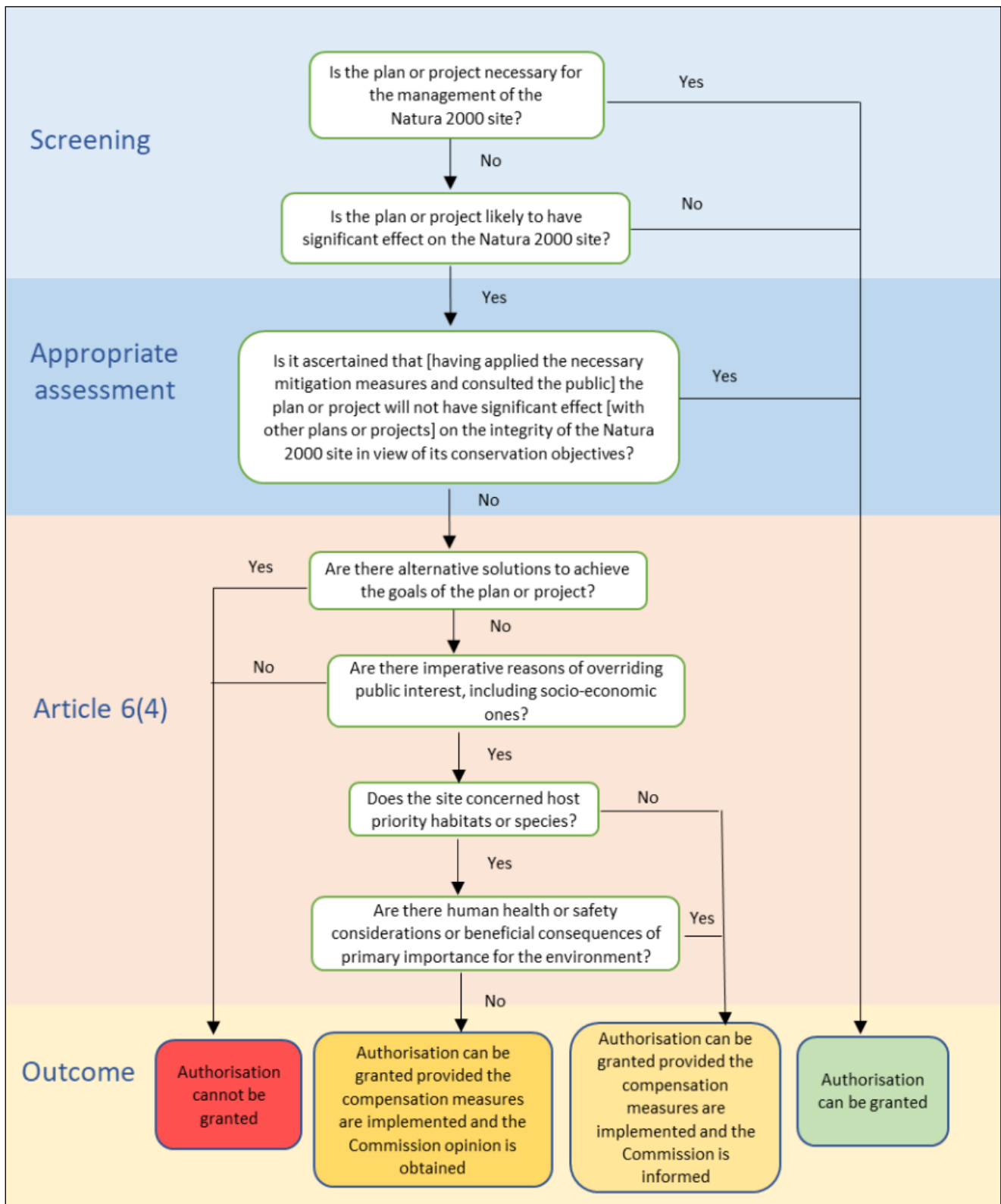


Figure 2-1 - Stages of the Appropriate Assessment process (EC, 2021a)



3. Methods

3.1 Guidance documents

The Screening for Appropriate Assessment was prepared with reference and due consideration to the following documents, guidelines and case law, including but not limited to: -

- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna. *Official Journal of the European Communities* L 206/7-50.
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. *Official Journal of the European Union* L 20/7-25.
- European Communities (Birds and Natural Habitats) Regulations, 2011. *S.I. No. 77/2011* (as amended) (“the Habitats Regulations”).
- Planning and Development Act, 2000. *No. 30 of 2000* (as amended) (“the Planning and Development Acts”).
- Planning and Development Regulations, 2001. *S.I. No. 600/2001* (as amended) (“the Planning Regulations”).
- EC (2019). *Managing Natura 2000 sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC*. European Commission, Brussels. *Official Journal of the European Union* C 33/1-62.
- EC (2021a). *Assessment of plans and projects in relation to Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC*. European Commission, Brussels. *Official Journal of the European Union* C 437/1-107.
- EC (2021b) *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive*. *C(2021) 7301*. European Commission, Brussels.
- DG Env (2022) *Guidance document on assessment of plans and projects in relation to Natura 2000 sites – A summary*. Directorate-General for Environment, European Commission, Brussels. Publications Office of the European Union, Luxembourg.
- DEHLG (2010a) *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Revised 11/02/2010*. Department of the Environment, Heritage and Local Government, Dublin.
- DEHLG (2010b) *Circular NPW 1/10 & PSSP 2/10. Dated 11/03/2010*. Department of the Environment, Heritage and Local Government, Dublin.
- NPWS (2012) *Marine Natura Impact Statements in Irish Special Areas of Conservation. A Working Document. April 2012*. National Parks & Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- NPWS (2021) *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland. National Parks & Wildlife Service Guidance Series 1*, Department of Housing, Local Government and Heritage, Dublin.
- Mullen, E., Marnell, F. and Nelson, B. (2021) *Strict Protection of Animal Species – Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority. National Parks & Wildlife Service Guidance Series 2*, Department of Housing, Local Government and Heritage, Dublin.



- OPR (2021) *Appropriate Assessment Screening for Development Management*. OPR Practice Note PN01. Office of the Planning Regulator, Dublin.
- Case law, including *Waddenzee* (C-127/02), *Sweetman v. An Bord Pleanála* (C-258/11), *Kelly v. An Bord Pleanála* (IEHC 400), *Commission v. Germany* (C-142/16), *People Over Wind* (C-323/17), *Holohan v. An Bord Pleanála* (C-461/17), *Eoin Kelly v. An Bord Pleanála* (IEHC 84), *Heather Hill* (IEHC 450) and *Eco Advocacy v. An Bord Pleanála* (C-721/21).
- Sundseth, K. and Roth, P. (2014) *Article 6 of the Habitats Directive – Rulings of the European Court of Justice*. Ecosystems LTD (N2K Group), Brussels.

3.2 Desk Study

Baseline data regarding the receiving environment, including Natura 2000 sites, was gathered through a thorough desk study.

The boundaries of Natura 2000 sites were downloaded from *NPWS: Maps and Data* <<https://www.npws.ie/maps-and-data>>. Information on sites, including their overall structures and functions, qualifying interests, conservation objectives and threats/pressures and activities therein, was found in the Site Synopsis, Natura 2000 Standard Data Form, Conservation Objectives and supporting documents for each site. Spatial data for site-specific conservation objectives of Natura 2000 sites, and boundary data for other designated sites, such as Natural Heritage Areas, was also retrieved from *NPWS: Maps and Data*. Reporting under Article 17 of the Habitats Directive (NPWS, 2019a-c; *Article 17 web tool*) and Article 12 of the Birds Directive (NPWS, 2024c; *Article 12 web tool*) provided further information on the habitats and species concerned at the national level.

Information relating to recent and historical records of species was obtained from the National Biodiversity Data Centre (NBDC) *Biodiversity Maps* <<https://maps.biodiversityireland.ie/Map>>.

The Environmental Protection Agency (EPA) map viewer *EPA Maps (Water)* <<https://gis.epa.ie/EPAMaps/Water>> and spatial data for river, lake, canal, transitional and coastal waterbodies downloaded from the *EPA Geoportal* <<https://gis.epa.ie/GetData/Download>> was used to identify any hydrological connection between the proposed works and Natura 2000 sites or connected features. Satellite and aerial imagery from Google Earth, Bing Maps and Tailte Éireann was reviewed to identify hedgerows, treelines and other potential ecological features.

In order to inform the assessment of potential in-combination effects, planning applications from the surrounding area were reviewed using the National Planning Application Database, An Bord Pleanála's online map viewer and the EIA Portal.

Information from the aforementioned data sources was last access 28/04/2025.

3.3 Site Visit

Multiple ecological surveys were undertaken within the Masterplan site grounds by AtkinsRéalis ecologists Colin Wilson, Daniel Blake and Kevin Coogan from 2020 to 2025 details of which presented below. Surveys were also undertaken by Dr Tina Aughney (2020 Bat Surveys) and John Morgan of Independent Tree Surveys (2020 & 2024).

Previous Surveys



Initial ecological surveys were undertaken by Colin Wilson on 27th February, 16th July and 14th August 2020 and 21st July 2022. Surveys were undertaken within the Masterplan site and also across the wider landscape including all the Masterplan lands, Rathmichael Woods to the north of the Site and scrublands to the east of the railway line / east of the Site. During the course of both the winter and summer walkover surveys the Site was evaluated for the presence of and suitability for birds, mammals, amphibians and insect groups such as lepidoptera and hymenoptera. A Phase 1 habitat survey was undertaken during 16th July and 14th August 2020.

Dr Tina Aughney was commissioned by Atkins to undertake bat surveys for the Site in line with published best practice. The Site was surveyed for evidence of bat activity during 12th and 15th July and 6th and 7th August 2020. Bat surveys assessed the Site for evidence of roosting, feeding and commuting bats and included Tree Potential Bat Roost (PBR) Surveys, Static Detector Surveys, Dusk and Dawn Bat Surveys, Walking Transects and Building Inspections (old clubhouse buildings now demolished).

2023 - 2024 Surveys

The Masterplan development site was subject to re-surveying in 2023 and 2024 by AtkinsRéalís ecologists. The site and surrounding lands were resurveyed for evidence of terrestrial mammal activity and mammal refugia (badger setts, fox dens) during the 22nd February, 22nd April and 24th May 2024. The site was surveyed for evidence of badger, otter, fox, hedgehog, and squirrel activity as these species have been historically recorded within the environs of the Site. Surveys paid particular attention to any evidence of protected mammal species; badger as there is a known and recorded breeding/maternity sett located in lands to the west (c. 1km outside) of the proposed Site.

An otter survey was undertaken on the 25th October 2024. The survey consisted of inspecting both banks of the River Dargle (c. 840m per bank) beginning at the Swan Sanctuary at Harbour Road extending as far as Lower Dargle Road. The area surveyed for field signs of otter such as prints, slides, holts, couches and spraints.

The proposed development site and Masterplan lands were subject to surveying for the presence of wintering waterbirds on 22nd February 2023, 31st March 2023, 15th September 2023 and 22nd February 2024. A further waterbird survey was undertaken within the development site and along the River Dargle to ascertain if the Mute Swan (*Cygnus olor*) population associated with Bray Harbour utilise the greenfield areas of the development site or have regular passage over the development site. Morning and evening vantage point surveys were undertaken on the 22nd February 2024, 23rd February 2024, 29th February 2024 (midday survey), 7th March 2024 and 8th March 2024.

A Tree Survey was undertaken by Independent Tree Surveys during February 2024 for the proposed development. The significant individual trees inside the Site were assessed from ground level using Visual Tree Assessment (VTA) techniques and relevant observations and findings were recorded in compliance with the industry standard document BS5837: *Trees in relation to design, demolition and construction (2012)*.

2025 Surveys

The proposed development site was subject to a walkover survey on 17th February 2025 by AtkinsRéalís ecologist. Additional ecological surveys were undertaken on 29th April 2025 which included identifying primary habitats and plant species, a survey for terrestrial mammal activity and a bat emergence survey to determine if there are any bat roosts accommodated within the scattered trees found within the development site.

Site surveys evaluated the importance of the development site to flora and fauna in line with the approach set out in the *Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2018, 2024 reissue).



3.4 Statement of Authority

The Screening for Appropriate Assessment report was prepared by Kevin Coogan, Daniel Blake and Colin Wilson. Kevin McCaffery provided peer review and support.

Kevin Coogan (AtkinsRéalis) has a BSc (Hons) in Zoology from University College Dublin. He has developed ecological surveying skills through country-wide small river sampling experience, as well as habitat evaluation experience in Spain and Ireland. He has volunteer experience in bird surveying on North Bull Island SPA and Ireland's Eye SPA. Kevin collated background information for this assessment. He conducts research and site surveys including habitat classification (Fossitt classification), bird surveys, and terrestrial mammal activity. He assists in bat surveying and has carried out numerous bat emergence/activity surveys. He also assists in the development of Appropriate Assessment Screening reports, biodiversity chapters in various types of environmental assessment report (environmental constraints reports, feasibility reports, project design reports). Kevin undertook site surveys and assisted in the preparation of this report.

Daniel Blake (AtkinsRéalis Dublin) has a degree in Wildlife Biology and has been working in the environmental consultancy sector for the past six years. He has worked in both large scale government infrastructure projects as well as domestic projects across the UK and Ireland conducting both environmental and ecological roles. Primarily conducting protected species surveys such as bats, badgers, birds, reptiles, small mammals and amphibians as well as invasive species surveys. He has also earned a Natural England licence for the survey of Great crested newt. He has been involved in habitat surveying and assisted in the writing of Appropriate Assessments, Preliminary ecological appraisals and protected species reports. Throughout his career he has acted as an ECoW for numerous sites to ensure environmental laws and practices are met. He has been involved in water and soil sampling surveys, levelling surveys and creation of hibernaculum. Daniel undertook field surveys and for the proposed development assisted with the collation of background information to inform this report.

Colin Wilson (AtkinsRéalis Dublin) has a BSc (Hons) in Environmental Science and is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). He has over 16 years working in the fields of ecology and environmental management. He is a Senior Ecologist with experience in ecological surveying, environmental assessment, on-site ecological supervision and mitigation. He has experience on multiple infrastructure projects regarding all elements of surface and groundwater management, monitoring, sampling and associated reporting. Colin also has a broad range of experience in invasive species management, biosecurity and control. Colin has prepared AA screening reports, Natura Impact Statements and has also been involved in the development of Environmental Operating Plans and Construction Environmental Management Plans for a number of national infrastructure projects. Colin is the author of this report.

Kevin Mc Caffrey (AtkinsRéalis Galway) has a BSc (Hons) in Applied Freshwater and Marine Biology and a MSc in Environmental Sustainability. He is a Senior Ecologist with over 12 years' experience in freshwater and marine ecology, environmental surveying, impact assessment and as an Ecological clerk of Works. He has prepared and reviewed a wide range of technical reports including Environmental Impact Assessment, AA screening, Natura Impact Assessment and sanitary surveys. Kevin provided peer review and support for this assessment.



4. Existing Environment

4.1 General Overview

The site of the proposed development is located on lands formerly used as a golf course. The project site is also bordered to the south by former Bray Golf Club lands / Masterplan lands at the south of which the River Dargle which flows in an easterly direction outfalling to the Irish Sea in Bray Harbour c. 225m from the southeast extent of the project site. This stretch of the river has been subject to flood alleviation works and the banks of the river have been recently developed into a formalised promenade and public amenity space. To the north of the site the Rathmichael Stream flows in an easterly direction through wooded and grassland areas which have formalised public pathways throughout. To the east the Dublin to Rosslare railway line forms a continuous border for the entirety of the development site. The west boundary of the development site is dominated by a residential estate currently nearing the end of construction as part of Phase 1 of the Sea Gardens Masterplan.

4.2 Site Survey Evidence

The habitats and species recorded within the Site, as identified from April 2025 site surveys, are individually described and evaluated in the following section. Site survey photographs are presented below and the habitats within the site are illustrated in Figure 4-1 below.

Amenity Grassland GA2

The site is a former golf course and the lands are predominantly comprised of amenity grassland (GA2). The grasslands are well maintained and regularly mown for the large part, however, small areas of grassland have been left uncut. Grass species within the Site include; *Lolium perenne* (Rye grass), *Fescue* spp. and *Dactylis glomerata* (Cock's foot) (non-exhaustive list); as well as *Trifolium repens* (White clover). In areas where the grass has been left uncut Cleavers (*Galium aparine*) and Red Valerian (*Centranthus ruber*), have also established. The amenity grassland is considered to be of low ecological value. Site photo; Plate 1 below shows the amenity grassland within the development site.

Spoil and Bare Ground ED2

There are areas of spoil and bare ground (ED2) within the grasslands and a large spoil heap in the northern section of the site. The spoil has been generated from the adjoining housing development site. Some plant species are starting to establish on the spoil heap but not to the extent where it could be classified as recolonising bare ground. The spoil heap is considered to have no ecological value. Site photo; Plate 3 below shows the spoil heap in the northern section of the site.

Artificial Surfaces BL3

There are also extensive areas of gravel surfaces within the development site which are currently used for the storage of construction materials related to the adjoining construction site (materials include; containers, bricks, pallets, ducting pipes, sand etc.). The artificial surfaces is considered to have no ecological value.

Large areas of the development site comprised of gravel surfaces and amenity grasslands are scattered with a wide range of construction related materials. Site photo; Plate 2 shows the gravel surfaces within the development site.

Scattered Trees and Parkland WD5



There are no trees within the development site. Directly along the southern boundary of the development site there are 4 no. Sycamore trees (*Acer pseudoplatanus*), two mature and two semi-mature. These trees will likely be lost as a result of the proposed development. Plates 4 & 5 below show the mature sycamores along the southern site boundary.

No evidence of any invasive plant species was noted during site surveys.

Evidence of Fauna

No evidence of legally protected terrestrial mammals (e.g. badger, hedgehog) was noted during 2025 site surveys. There is no terrestrial mammal refugia (e.g. badger setts) within the project site. Evidence of fox was noted (prints).

The proposed development site was subject to surveying for bats by AtkinsRealis ecologists on 29th of April 2025.

No bats were recorded emerging from any of the 4 no. trees around the border of the development site during the survey indicating these trees are not used by roosting bats. These trees have been subject to 3 no. separate bat surveys since 2020 with no bat roosts recorded at any time.

Two species of bats were recorded by the detectors during the survey; Common pipistrelle (*Pipistrellus pipistrellus*) and Leisler's bat (*Nyctalus leisleri*). Bat activity across the development site was noted to be very low. A single Common pipistrelle was observed commuting centrally along the site from north to south. 3 no. Leisler's bats was recorded overflying the site but not observed though this is typical as this is a high flying bat species and was likely commuting over the site.

No bat roosts were recorded during the survey. The bats recorded during the survey were considered to be commuting across the site. This commuting activity was considered to be low.



Plate 1 –Amenity Grassland GA2



Plate 2 – Artificial surfaces BL3



Plate 3- Spoil and Bare Ground ED2.



Plates 4 & 5 – Mature Sycamores on south boundary of Site.





Figure 4-1 – Habitats within the development site



4.3 Designated Sites

Natural Heritage Area (NHA) is the basic designation for wildlife sites. These sites are considered to represent important habitats for species of plants and animals whose habitat needs protection¹. These sites are protected under the Wildlife Act, 1976 (as amended)².

Additionally, proposed Natural Heritage Areas (pNHA) are those which have been published on a non-statutory basis, and have yet to be statutorily designated. These sites are of significance to flora, fauna, and their respective habitats. These sites will be designated on a phased basis over the coming years. Prior to designation pNHAs are subject to limited protection³.

There are no NHAs or pNHAs within or adjacent to the proposed development site. Bray Head pNHA is the closest located c. 1.7km south of the site. Bray Head is designated as a Special Area of Conservation; Bray Head SAC (000714) and is further designated at a national level as a proposed Natural Heritage Area; Bray Head pNHA (000714). Bray Head is also subject to a Special Amenity Area Order (Wicklow County Council; Bray Town Council; Greystones Town Council, 2007⁴). A Special Amenity Area Order (SAAO) is designed to protect areas that are of particularly high amenity value, which are sensitive to intense development pressure and which cannot be adequately protected by existing planning controls. The Special Amenity Area Order for Bray Head lists: - *Objectives in relation to the Preservation or Enchantment of the Character or Special Features of the Area*. A summary of the objectives detailed in Bray Head SAAO are as follows (non-exhaustive list): -

- Objective 1.1 - *'In order to facilitate social inclusion, it is an objective of the Council to increase public access on foot to coastal, heathland and woodland areas for informal recreation.'*
- Objective 1.2 - *'To protect the special amenity area ensuring that its resources are used in an effective and sustainable manner.'*
- Objective 1.3 - *'To manage the area in order to conserve its natural and cultural assets and realise its exceptional potential as a place for informal recreation, tourism and environmental education.'*

The SAAO further outlines: -" *Heath, a habitat listed on Annex I of the EU Habitats Directive, is the principle habitat over much of the Head. It occurs over the light sandy soils found in the upper slopes of Bray Head. The heath community is frequently accidentally or deliberately burned and this assists its development rather than hinders it.'* Bray Head SAAO lists as Policy 1.3.4; *'The Council, in accordance with the Wildlife (Amendment) Act, 2000 and the National Parks and Wildlife Service shall promote a Heathland Management Programme consisting of controlled burning of the site on a ten year rotation, in small patches, during the legal burning season.'*

There is no indirect hydrological connectivity to Bray Head pNHA or any other pNHA within 15km of the proposed development site. pNHAs within 15km of the proposed development are illustrated in Figure 4-2 below.

¹ <https://www.npws.ie/protected-sites/nha>

² <https://www.npws.ie/legislation/irish-law/wildlife-amendment-act-2000>

³ <https://www.npws.ie/protected-sites/nha>

⁴ <https://www.wicklow.ie/Portals/0/adam/Content/l46A8jfaW0el3Wd4pR64AQ/Link/Bray%20Head%20Special%20Area%20Amenity%20Order%202007.pdf>



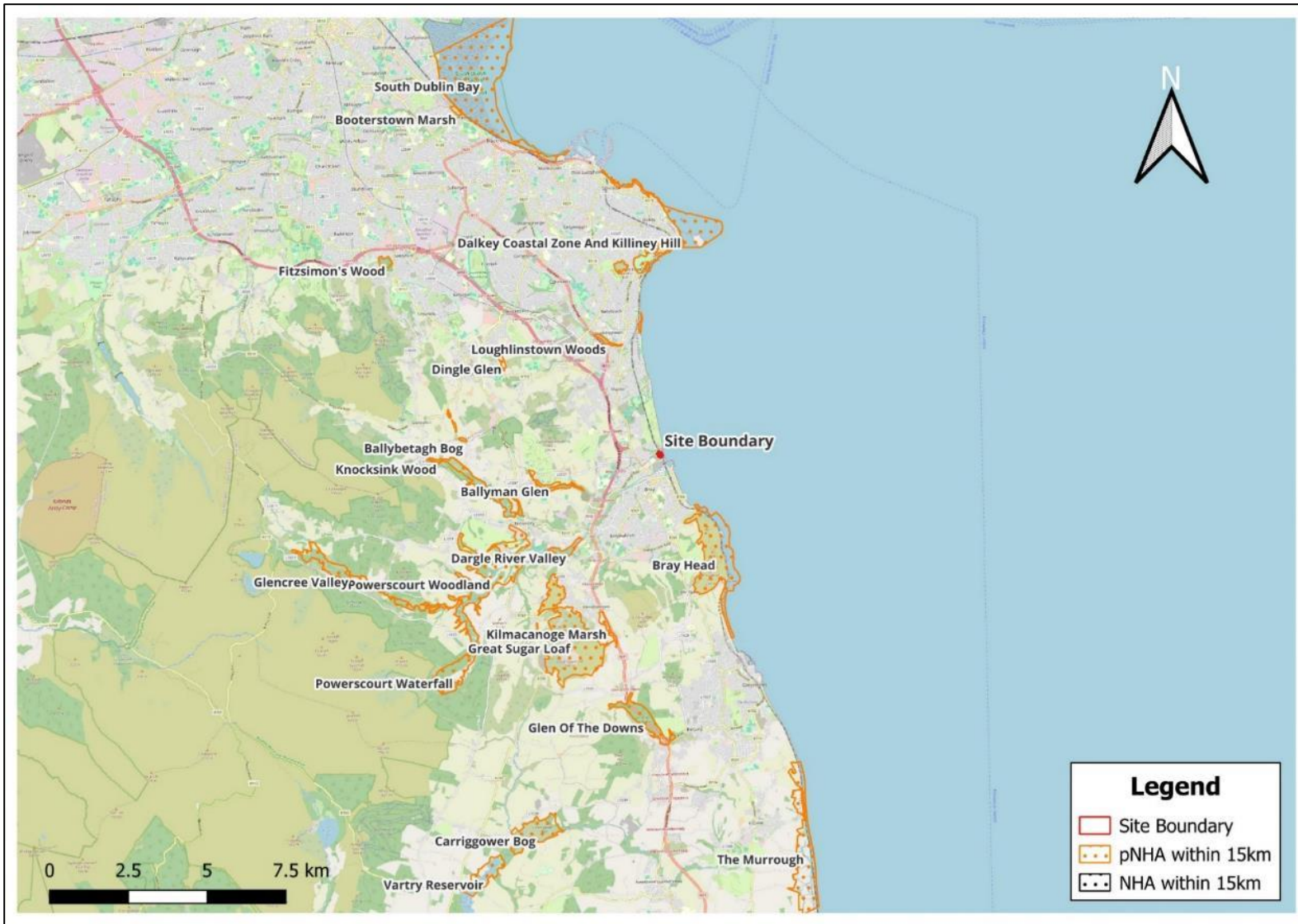


Figure 4-2 - Designated Sites within 15km of the proposed development.



4.4 Annex I Habitats

Annex I habitats were reviewed in the context of the proposed project. These are habitats listed on Annex I to the Habitats Directive and for which Member States must designate SACs. The overall objective of the Habitats Directive is to achieve and maintain favourable conservation status for all habitats and species of community interest; and to contribute towards maintaining biodiversity of natural habitats and of wild flora and fauna in member states. To this end, EU member states are obliged to monitor the conservation status of habitats and species. As all habitats (as listed in Annex I) and species of Community interest are included, the monitoring requirements obliged to be undertaken by member states is not restricted to Natura 2000 sites (SACs and SPAs) but encompasses the total national resource of each habitat. Consequently, data on Annex I habitat must be collected both within and outside the Natura 2000 network. In addition, member states are obliged, as detailed in Article 17 of the Habitats Directive, to report to the EU commission every six years on the implementation of measures taken towards meeting the objectives of the Directive. Annex I habitats are categorised into the following general habitat categories: - Bogs, mires and fens, Coastal habitats, Dunes habitats, Forests, Freshwater habitats, Grasslands, Heath and scrub and Rocky habitats.

Site survey evidence and a review of NPWS Article 17 datasets⁵ (last accessed 28/04/2025) does not identify any Annex I habitats within or connected to the proposed development site.

4.5 Surface Water Features

There are no surface water features within the proposed development site. Surface water drainage from the development site will outfall to the River Dargle located c. 225m south the Site. The Rathmichael stream located c. 35m north of the proposed development site, there is no connectivity from the development site to Rathmichael stream. These watercourses flow directly to the Irish Sea east of the development site. Refer to Figure 4-3 below for the locations of surface water features near the development site.

The proposed development is located within the Dargle subcatchment (Subcatchment ID 10-5). The River Dargle (EPA code: IE_EA_10D010300) is detailed by the EPA as having 'Good' water quality status (2016-2021) and is detailed as being 'Not at Risk' of failing to meet the relevant Water Framework Directive (WFD) objectives by 2027. The Rathmichael stream (EPA code: IE_EA_10D010300) is detailed as having 'Good' water quality status (2016-2021) and is noted as being 'Not at Risk'.

EPA undertake biological monitoring of the River Dargle along a stretch of the river c. 2km upstream of the Dargle estuary. The 2024 EPA Q-Value is noted to be 4 indicating the watercourse has a 'Good' WFD status, is unpolluted and has a satisfactory condition. The main channel of the River Dargle is noted to be designated as a Salmonid Water under the European Communities (Quality of Salmonid Waters) Regulations, 1988 (S.I. No. 293/1988) and the River Dargle is known to accommodate otters.

The EPA also monitor the Dargle Estuary (EPA code: IE_EA_110_0100) which commences in Bray Harbour. The estuary is recorded as having 'Moderate' water quality status (2016-2021) and is detailed as being under 'Review' of failing to meet the relevant Water Framework Directive (WFD) objectives by 2027.

⁵ <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>





Figure 4-3 - Surface Water features close to the proposed development.

4.6 Groundwater Body

The proposed development is located within the Wicklow (Code IE_EA_G_076) groundwater body (GWB). This GWB is of 'Good' Water Framework Directive (WF) status and detailed as being 'At Risk' of failing to meet the WFD objectives by 2027. EPA datasets identify groundwater vulnerability beneath the development site is 'moderate'.

4.7 Species

4.7.1 Otters

Otter have historically been recorded within the River Dargle with the latest NBDC recorded sighting noted to be during 2017.

An otter survey was conducted by AtkinsRéalis ecologist along a c. 840m stretch of the River Dargle during October 2024, both banks of the river were inspected for otter holts and couches any evidence of otter activity such as spraints or prints. The River Dargle bank c.225m south of the proposed development site is noted to be a reinforced concrete flood defence wall which does not proffer a habitat were a holt could be established. The opposing bank is also manmade, noted to be a mixture of walls and stone reinforced bank which does not proffer habitats highly suitable for the establishment of an otter holt.

No evidence of otter activity was noted during the survey of the c. 840m stretch of the lower River Dargle. There are no otter holts or couches along the River Dargle south of the development site.

4.7.2 Marine Mammals

NBDC records identify the following marine mammals as having been recorded within the coastal waters directly around Bray Harbour; Common Porpoise (*Phocoena phocoena*), Bottle-nosed Dolphin (*Tursiops truncatus*), Common Dolphin (*Delphinus delphis*) and Grey Seal (*Halichoerus grypus*).

4.8 Birds

The usage of the proposed development site by ex-situ SPA waterbirds has also been considered. Historical records and site survey evidence determine the proposed development site is not a terrestrial area utilised by field feeding wildfowl and/or waterbirds.

Bray Harbour Swan Sanctuary and I-WeBS Monitoring Site

Bray Harbour is noted to a Swan Sanctuary. The harbour and the lower stretches of the River Dargle are also an I-WeBS (Irish Wetland Bird Survey) monitoring site which is located c. 230m south of the proposed development along the River Dargle⁶. This site is home to a high number of mute swans. Figure 4-4 below illustrates the proximity of the proposed development site to Bray Harbour I-WeBS count site as well as the Swan Sanctuary.

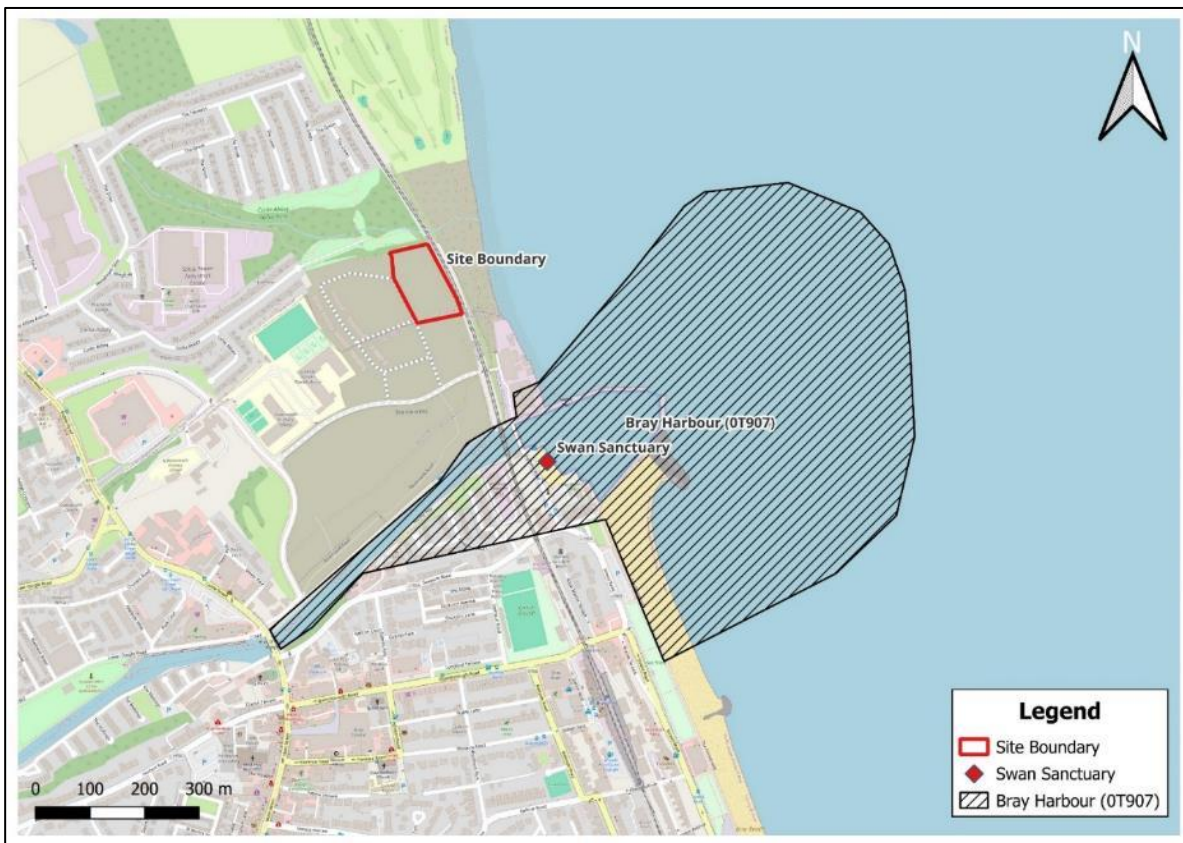


Figure 4-4 - Bray Harbour I-WeBS site and Swan Sanctuary.

⁶ https://birdwatchireland.ie/app/uploads/2023/08/iwebs_trends_0T907_Bray_Harbour.html

The latest bird count data for the Bray I-WeBs site was requested from BirdWatch Ireland and was received on 5th November 2024. Table 4-1 below lists the latest available bird count data and details the annual peak waterbird counts between 2018-2024 (data deficient for 2020) for I-WeBS count site; Bray Harbour (0T907).

Table 4-1 – Annual Peak Waterbird counts for I-WeBS site Bray Harbour (0T907)

Species Name	Scientific name	2018/2019	2021/2022	2022/2023	2023/2024
Mute Swan	<i>Cygnus olor</i>	47	87	59	68
Light-bellied Brent Goose	<i>Branta bernicla hrota</i>		0	0	5
Mallard	<i>Anas platyrhynchos</i>	31	16	13	48
Red-throated Diver	<i>Gavia stellata</i>		0	0	2
Cormorant	<i>Phalacrocorax carbo</i>	3	13	1	4
Shag	<i>Phalacrocorax aristotelis</i>		3	1	24
Little Egret	<i>Egretta garzetta</i>		0	1	0
Grey Heron	<i>Ardea cinerea</i>	2	1	0	2
Oystercatcher	<i>Haematopus ostralegus</i>		0	0	15
Ringed Plover	<i>Charadrius hiaticula</i>		0	0	1
Curlew	<i>Numenius arquata</i>	1	0	0	0
Turnstone	<i>Arenaria interpres</i>	64	63	32	87
Black-headed Gull	<i>Chroicocephalus ridibundus</i>	98	376	133	183
Common Gull	<i>Larus canus</i>	2	5	3	16
Lesser Black-backed Gull	<i>Larus fuscus</i>	1	0	0	0
Herring Gull	<i>Larus argentatus</i>	187	142	25	410
Great Black-backed Gull	<i>Larus marinus</i>	3	1	0	7
Mediterranean Gull	<i>Larus melanocephalus</i>				28
Greylag Goose	<i>Anser anser</i>	3	0	0	0
Mallard (domestic)	<i>Anas platyrhynchos</i>	2	0	0	0
Ring-billed Gull	<i>Larus delawarensis</i>	1	0	0	0

2024 Site Survey Evidence

2024 site surveys included dawn, day and dusk surveys and assessed bird activity and species numbers both within and overflying the Masterplan development site.

2 no. Vantage Points were employed for each survey; the Swan sanctuary at Bray Harbour was used as Vantage Point 1 and the River Dargle walkway parallel to the Site was used as Vantage Point 2. Each dawn and dusk survey lasted 4 hours and daytime surveys lasted 2 hours.

It was noted that the waterbirds found in Bray Harbour, in particular the Mute swans and gulls, are habituated to human activity with pedestrians and cars noted within c. 2m of the swans and gulls roosting location on the beach within the harbour walls. 1 no. Mute Swan and 1 no. mallard were noted overflying the railway bridge adjacent to Bray Harbour, both birds flew from the harbour to the River Dargle and did not cross the proposed development Site. No geese species, such as Light-bellied Brent Geese, were noted during surveys. Long-term data for the past 23 years suggests that turnstone, mallard, and mute swan numbers are stable or increasing for Bray Harbour⁷. Table 4-2 below outlines the bird species observed during the survey, notes location and if they are Qualifying Interest of a Natura 2000 site.

⁷ https://birdwatchireland.ie/app/uploads/2023/08/iwebs_trends_0T907_Bray_Harbour.html



Table 4-2 – Bird species noted during 2024 surveys of the Sea Gardens Masterplan site

Species	Scientific name	Max Number Recorded in Bray I-WeBs site	Number in Harbour	Number Overflying Masterplan Lands	Number Recorded Within the Masterplan Lands	Qualifying Interest of Natura 2000 site
Blackbird	<i>Turdus merula</i>	2		3		
Wood pigeon	<i>Columba palumbus</i>	60+		15		
Hooded Crow	<i>Corvus cornix</i>	100+		3		
Herring gull	<i>Larus argentatus</i>	150+/-		6	7	The Murrough SPA, North-West Irish Sea SPA
Mute Swan	<i>Cygnus olor</i>	57				
Heron	<i>Ardea cinerea</i>	1		1		
Mallard Duck	<i>Anas platyrhynchos</i>	60				
Common Gull	<i>Larus canus</i>	21			40	North-West Irish Sea SPA
Turnstone	<i>Arenaria interpres</i>	80				
Mediterranean Gull	<i>Ichthyaetus melanocephalus</i>	20				
Black-Headed Gull	<i>Larus ridibundus</i>	150		5		Dublin Bay and River Tolka Estuary SPA, The Murrough SPA, North-West Irish Sea SPA
Cormorant	<i>Phalacrocorax carbo</i>	2		1		North-West Irish Sea SPA
Jackdaw	<i>Coloeus monedula</i>	10				
Wagtail	<i>Motacilla alba yarelli</i>	4				
Lesser Black-Backed Gull	<i>Larus fuscus</i>	120				North-West Irish Sea SPA
Shag	<i>Gulosus aristotelis</i>	1				
Magpie	<i>Pica pica</i>	2				
Great Black-Backed Gull	<i>Larus marinus</i>	1				North-West Irish Sea SPA



Oystercatcher

*Haematopus
ostralegus*

1

Dublin Bay and River Tolka Estuary SPA



4.9 Species Records

A review of the NBDC datasets identified the following bat species recorded within the development site during 2020 Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Daubenton's Bat (*Myotis daubentonii*) and Lesser Noctule (*Nyctalus leisleri*).

A review of NBDC records does not identify any historical records of badgers within the development site. Terrestrial mammal species recorded within the development site and immediate environs includes hedgehog (*Erinaceus europaeus*), fox (*Vulpes vulpes*), and otter (*Lutra lutra*). Invasive species Grey squirrel (*Sciurus carolinensis*) has also been historically recorded within the Site.

4.10 Invasive Species

Site survey evidence and a review of NBDC datasets did not identify any invasive species within the proposed development site.



5. Connectivity to Natura 2000 Sites

5.1 Zone of Influence

The “Zone of Influence” of a plan, project or development is the area which may experience ecological effects as a result of its implementation, including any ancillary activities. The various impacts of a plan or project will each have their own characteristics, e.g. nature, extent, magnitude, duration etc. Accordingly, the area subject to each impact (“zone of impact”) will vary depending on characteristics of the impact and the presence of pathways for its propagation. Ecological features within or connected to one or more zones of impact could, depending on their sensitivities, be affected by the plan or project under consideration. The area containing such features may be regarded as the Zone of Influence. As such, in establishing the Zone of Influence for a plan, project or development, regard must be had to the characteristics of its potential impacts, potential pathways for impacts and the sensitivities of ecological features in the receiving environment.

In its guidance on selecting which Natura 2000 sites to include in the AA Screening, *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (DEHLG, 2010a) recommends inclusion of sites in the following three categories: -

- Any Natura 2000 sites within or adjacent to the plan or project area,
- Any Natura 2000 sites within the Zone of Influence of the plan or project (generally within 15 km for plans, to be established on a case-by-case basis for projects, having regard to the nature, scale and location of the project, the sensitivities of the ecological receptors and the potential for in-combination effects), and
- Following the precautionary principle, any other Natura 2000 sites for which the possibility of significant effects cannot be excluded, e.g. for a project with hydrological impacts, it may be necessary to check the full extent of the catchment for Natura 2000 sites with water-dependent qualifying interests.

In addition, *Assessment of plans and projects in relation to Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC* (EC, 2021) recommends consideration of Natura 2000 sites hosting fauna which could move to the project area or its zone(s) of impact, and the potential for the project to sever ecological connectivity within or between Natura 2000 sites. *Appropriate Assessment Screening for Development Management* (OPR, 2021) emphasises the importance of employing the source-pathway-receptor model (rather than arbitrary distances such as 15km) when selecting Natura 2000 sites for inclusion in the AA Screening.

The proposed development site does not lie within any Natura 2000 site nor is it adjacent to any Natura 2000 site. The proposed development site is sufficiently remote from any Natura 2000 site (closest being c. 1.7km) so as to negate any potential connectivity via groundwater pathways. The proposed development site is sufficiently remote from any Natura 2000 site so as to preclude any potential visual effects or effects from noise or dust. The zone of influence of the development therefore includes those Natura 2000 sites with potential indirect connectivity through the following pathways: -

- Hydrological – effects from surface water quality or quantity

The proposed development site is located c. 225m to the north of the River Dargle which outfalls to the Irish Sea. The proposed development will not involve any instream works, or any works within 225m of the River Dargle nor will works involve construction of the surface water / storm water drainage outfall for the proposed development on the banks of the River Dargle as this infrastructure has previously been constructed as part of the granted Phase 1 development. Drainage during the operational phase of the proposed development will



outfall to the River Dargle and Irish Sea via the in situ drainage infrastructure. Given that a number of the Natura 2000 sites within the potential zone of influence of the proposed development are coastal or marine in nature, hydrological connectivity exists from the development site to the coastal and marine based Natura 2000 sites via the River Dargle and Irish Sea. The closest Natura 2000 sites with potential indirect connectivity via the River Dargle and Irish Sea are; Bray Head SAC (000714) (c. 1.7km) and Rockabill to Dalkey Island SAC (003000) (c. 4.1km).

When establishing the zone of influence, consideration has also been given to species which may occur at a distance from the SAC or SPA for which they are a Qualifying Interest. Harbour porpoise and otter, which are QI species of Rockabill to Dalkey Island SAC and Wicklow Mountains SAC respectively, can cover significant distances are examples of such mobile species. Similarly many SPA waterbird species have a wide geographical range, notably seabirds such as the Roseate Tern which has recently been noted as breeding in small numbers in Dalkey Island SPA during 2020⁸ and which have an important breeding colony within Rockabill SPA. Therefore, the mobility of QI species and their potential to range outside of the delineated boundaries of their respective Natura 2000 sites has also been considered as part of this assessment.

There are 14 no. Natura 2000 sites within the potential zone of influence (Zol) of the proposed development; 9 no. SACs and 5 no. SPAs. Table 5.1 and 5.2 details the Natura 2000 sites which are within the potential Zol of the proposed development, lists their associated qualifying interests and specifies if there is connectivity to the Natura 2000 site from the proposed development or not.

Figures 5-1 and 5-2 depict the locations of the Natura 2000 sites within the potential Zol of the proposed development.

⁸ Details of Dalkey Island Roseate tern - <http://roseatetern.org/dalkey-island.html>



Table 5-1 - SACs within potential Zol of the proposed development.

Site Code	Name and	Approximate Distance from development location	Features of Interest	Within the Zol
Bray Head (000714) ⁹	SAC	c. 1.7km	<ul style="list-style-type: none"> ▪ Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] ▪ European dry heaths [4030] 	<p>No.</p> <p>Bray Head SAC is designated for the conservation of cliff and heath habitats. There is no direct overlap between the project site and this SAC, nor do these habitats occur within or in close proximity to the project site. There are no proposed construction activities within or near the River Dargle.</p> <p>Storm water drainage infrastructure for the proposed development site has been previously constructed as part of the granted Phase 1 development and is currently in situ. Indirect hydrological connectivity does exist during the operational phase of the proposed development via the surface water drainage infrastructure which outfalls to the River Dargle and further to the Irish Sea.</p> <p>The QI habitats for the SAC are terrestrial in nature; heaths and cliffs; vegetated sea cliffs of the Atlantic and Baltic coasts [1230] & European dry heaths [4030]. Potential indirect impacts from the proposed project via the hydrological pathway of the Irish Sea on terrestrial heath habitats located on top of the headland are precluded given the lack of possible connectivity.</p> <p>Potential indirect impacts via the hydrological pathway of the Irish Sea on terrestrial cliff habitats are not considered likely given that only the base of the cliffs are in contact with coastal waters. Also, given the dilution and dispersal that would occur within the Irish Sea this is not considered a</p>

⁹ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000714.pdf



Site Name and Code	Approximate Distance from development location	Features of Interest	Within the Zol
Rockabill to Dalkey Island SAC(003000) ¹⁰	c. 4.1km	<ul style="list-style-type: none"> ▪ Reefs [1170] ▪ <i>Phocoena phocoena</i> (Harbour Porpoise) [1351] 	<p data-bbox="1220 295 2094 359">viable pathway through which the conservation objectives of the SAC could be affected.</p> <p data-bbox="1220 375 2094 853">The proposed development once completed may lead to an increase in public footfall within Bray Head SAC. There are formalised and managed pathways through Bray Head some of which are through heathland habitats and along cliff tops. The objectives and principles of Bray Head Special Amenity Area Order detail extensive measures for the management of increased public access as well as for the maintenance of recreational walkways to be undertaken in combination with the protection of the heath and cliff habitats. Given that the formalised paths through Bray Head are already heavily utilised by the public, and given the paths and heaths are subject to continued management and maintenance measures, it is considered that any increase in footfall that may occur along Bray Head's formalised pathways as a result of the proposed development is not likely to have significant effects on Bray Head's heath and cliff habitats in view of their conservation objectives.</p> <p data-bbox="1220 869 1736 901">This site is not therefore considered further.</p> <p data-bbox="1220 917 1288 949">Yes.</p> <p data-bbox="1220 965 2094 1029">This marine SAC is designated for reef habitat and for the conservation of marine mammal; Harbour porpoise.</p> <p data-bbox="1220 1045 2094 1173">There is no direct overlap between the development site and this SAC. The QI habitats and species are marine in nature and therefore do not occur within the project site. The site lies within OS 2km grid square; O21U; this includes adjoining coastal waters. NBDC datasets includes</p>

¹⁰ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO003000.pdf



Site Code	Name and	Approximate Distance from development location	Features of Interest	Within the Zol
				<p>recent records of QI species harbour porpoise within this grid square (09/04/2020).</p> <p>During the operational phase surface water drainage from the proposed development site will outfall to the River Dargle and Irish Sea. Therefore, during the operational phase, the proposed development has potential indirect connectivity to the qualifying interests of this SAC via the River Dargle and the Irish Sea.</p> <p>During the operational phase of the proposed development foul waters will be treated at Shanganagh WwTP. Treated waters from the WwTP outfall to the Irish Sea. Therefore, the proposed project has potential indirect connectivity to the qualifying interests of this SAC via discharged treated waters from the WwTP at Shanganagh.</p> <p>Also given the mobile nature of the QI species; Harbour porpoise, there is potential indirect connectivity to this Rockabill to Dalkey Island SAC QI species where harbour porpoise may occur within marine waters outside of the SAC site extents / near Bray Harbour.</p> <p>Rockabill to Dalkey Island SAC is considered further below.</p>
Ballyman SAC (000713) ¹¹	Glen	c. 2.2km	<ul style="list-style-type: none"> ▪ Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] ▪ Alkaline fens [7230] 	<p>No.</p> <p>Ballyman Glen SAC is designated for alkaline fen and natural spring habitats. There is no direct overlap between the development site and this SAC, nor do these habitats occur within or in close proximity to the project.</p> <p>There is no indirect connectivity from the project to this SAC via surface water features, drainage ditches or by any other vectors. The project site</p>

¹¹ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000713.pdf



Site Code	Name and	Approximate Distance from development location	Features of Interest	Within the Zol
				<p>is downstream of Ballyman Glen and as such cannot influence the features of interest of this SAC.</p> <p>The location, scale and duration of the development project is such that they will not contribute to direct or indirect impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats. This site is not considered further.</p>
Knocksink SAC (000725) ¹²	Wood	c. 4.1km	<ul style="list-style-type: none"> ▪ Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] ▪ Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] ▪ Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0] 	<p>No.</p> <p>Knocksink Wood SAC is designated for woodland and natural spring habitats. There is no direct overlap between the development site and this SAC, nor do these habitats occur within or in close proximity to the project.</p> <p>There is no indirect connectivity from the project site to this SAC via surface water features, drainage ditches or by any other vectors.</p> <p>The location, scale and duration of the development project is such that they will not contribute to direct or indirect impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats. This site is not considered further.</p>
Glen of the Downs SAC (000719) ¹³		7.5km	<ul style="list-style-type: none"> ▪ Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] 	<p>No.</p> <p>Glen of the Downs SAC is designated for oak woodland habitats. There is no direct overlap between the development site and this SAC, nor do these habitats occur within or in close proximity to the project.</p>

¹² https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000725.pdf

¹³ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000719.pdf



Site Name and Code	Approximate Distance from development location	Features of Interest	Within the Zol
Wicklow Mountains SAC (002122) ¹⁴	c. 7.5km	<ul style="list-style-type: none"> ▪ Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] ▪ Natural dystrophic lakes and ponds [3160] ▪ Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] ▪ European dry heaths [4030] ▪ Alpine and Boreal heaths [4060] ▪ Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130] ▪ Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] ▪ Blanket bogs (* if active bog) [7130] 	<p>There is no indirect connectivity from the project to this SAC via surface water features, drainage ditches or by any other vectors.</p> <p>The location, scale and duration of the development project is such that they will not contribute to direct or indirect impacts on the habitat for which the SAC has been designated and do not have the potential to affect the conservation objectives of this habitat. This site is not considered further.</p> <p>Yes.</p> <p>This mountainous SAC is designated for a range of habitats and for the conservation of otters found within the lakes and rivers of the Wicklow mountains.</p> <p>There is no direct overlap between the proposed development and this SAC, nor do any of these habitats occur within or in close proximity to the proposed development. The proposed development therefore does not have the potential to affect any of the qualifying interest habitats of this SAC.</p> <p>The SAC is c. 14km upstream of the development site at closest point and otters are a mobile QI species associated with this SAC. It is considered that the lower stretches of the River Dargle in Bray town are likely outside of the territorial range of the otter populations of the very geographically large Wicklow Mountains SAC, however, following a precautionary approach, it has been assumed for the purposes of this assessment that ex-situ QI otters from the SAC may commute or range 14+km downstream to the estuarine waters of the River Dargle in Bray town. As such Wicklow</p>

¹⁴ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002122.pdf



Site Name and Code	Approximate Distance from development location	Features of Interest	Within the Zol
		<ul style="list-style-type: none"> ▪ Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] ▪ Calcareous rocky slopes with chasmophytic vegetation [8210] ▪ Siliceous rocky slopes with chasmophytic vegetation [8220] ▪ Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] ▪ <i>Lutra lutra</i> (Otter) [1355] 	Mountains SAC QI Otters are assumed to be within the Zol of the proposed development for the purposes of this assessment.
South Dublin Bay SAC (000210) ¹⁵	c. 10km	<ul style="list-style-type: none"> ▪ Mudflats and sandflats not covered by seawater at low tide [1140] ▪ Annual vegetation of drift lines [1210] ▪ <i>Salicornia</i> and other annuals colonising mud and sand [1310] ▪ Embryonic shifting dunes [2110] 	<p>No.</p> <p>South Dublin Bay SAC is designated for a range of coastal and estuarine habitats. There is no direct overlap between the development site and this SAC, nor do protected coastal or estuarine habitats occur within or in immediate proximity to the project site.</p> <p>Indirect connectivity exists to this SAC via c. 10km the Irish Sea, however, given the dilution and dispersal that would occur within the Irish Sea this is not considered a viable pathway through which there could be impacts on the QI habitats of the SAC in view of their conservation objectives.</p> <p>The location, scale and duration of the development project is such that they will not contribute to direct or indirect impacts on habitats for which the SAC has been designated and do not have the potential to affect the</p>

¹⁵ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000210.pdf



Site Code	Name	and	Approximate Distance from development location	Features of Interest	Within the Zol
					conservation objectives of these habitats. This site is not considered further.
The Wetlands (002249) ¹⁶	Murrough SAC		c. 11km	<ul style="list-style-type: none"> ▪ Annual vegetation of drift lines [1210] ▪ Perennial vegetation of stony banks [1220] ▪ Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) [1330] ▪ Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] ▪ Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210] ▪ Alkaline fens [7230] 	<p>No.</p> <p>The Murrough Wetlands SAC is designated for a range of coastal and wetland habitats.</p> <p>There is no direct overlap between the development site and this SAC, nor do protected coastal or wetland habitats occur within or in immediate proximity to the project site.</p> <p>Indirect connectivity exists to this SAC via c. 11km the Irish Sea; however, given the dilution and dispersal that would occur within the Irish Sea this is not considered a viable pathway through which there could be impacts on the QI habitats of the SAC in view of their conservation objectives.</p> <p>The location, scale and duration of the development project is such that they will not contribute to direct or indirect impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats. This site is not considered further.</p>
Carriggower SAC (000716) ¹⁷	Bog		c. 6.4km	<ul style="list-style-type: none"> ▪ Transition mires and quaking bogs [7140] 	<p>No.</p> <p>Carriggower Bog SAC is designated for wetland habitats. There is no direct overlap between the development site and this SAC, nor do protected wetland habitats occur within or in close proximity to the project.</p>

¹⁶ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002249.pdf

¹⁷ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000716.pdf



Site Code	Name and	Approximate Distance from development location	Features of Interest	Within the Zol
				<p>There is no indirect connectivity from the project to this SAC via surface water features, drainage ditches or by any other vectors.</p> <p>The location, scale and duration of the development project is such that they will not contribute to direct or indirect impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats. This site is not considered further.</p>



Table 5-2 - SPAs within potential Zol of the proposed development.

Site Code	Name and location	Approximate Distance from development location	Features of Interest	Within the Zol
South Dublin Bay and River Tolka Estuary SPA (004024) ¹⁸	c. 10km	<ul style="list-style-type: none"> ▪ Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] ▪ Oystercatcher (<i>Haematopus ostralegus</i>) [A130] ▪ Ringed Plover (<i>Charadrius hiaticula</i>) [A137] ▪ Grey Plover (<i>Pluvialis squatarola</i>) [A141] ▪ Knot (<i>Calidris canutus</i>) [A143] ▪ Sanderling (<i>Calidris alba</i>) [A144] ▪ Dunlin (<i>Calidris alpina</i>) [A149] ▪ Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] ▪ Redshank (<i>Tringa totanus</i>) [A162] ▪ Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] ▪ Roseate Tern (<i>Sterna dougallii</i>) [A192] ▪ Common Tern (<i>Sterna hirundo</i>) [A193] ▪ Arctic Tern (<i>Sterna paradisaea</i>) [A194] ▪ Wetland and Waterbirds [A999] 	<p>No.</p> <p>South Dublin Bay and River Tolka Estuary SPA is designated for a wide range of wintering waterbirds as well as the wetland habitats which host the bird species.</p> <p>There is no direct spatial overlap between the development site and this SPA. Site survey evidence and historical records determine the proposed development site is not a terrestrial area utilised by field feeding wildfowl and/or waterbirds.</p> <p>The proposed development will not restrict bird mobility between wetland sites nor affect migratory flight paths and there will be no likely significant effects on SPA bird populations from potential collision with the development. As such the proposed development will have no effect on any ex-situ waterbirds from the SPA</p>	
The Murrough SPA (004186) ¹⁹	c. 12.1km	<ul style="list-style-type: none"> ▪ Red-throated Diver (<i>Gavia stellata</i>) [A001] ▪ Greylag Goose (<i>Anser anser</i>) [A043] ▪ Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] ▪ Wigeon (<i>Anas penelope</i>) [A050] ▪ Teal (<i>Anas crecca</i>) [A052] 	<p>No.</p> <p>The Murrough SPA is designated for a wide range of wintering waterbirds as well as the wetland habitats which host the bird species.</p>	

¹⁸ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004024.pdf

¹⁹ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004186.pdf



	<ul style="list-style-type: none"> ▪ Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] ▪ Herring Gull (<i>Larus argentatus</i>) [A184] ▪ Little Tern (<i>Sterna albifrons</i>) [A195] ▪ Wetland and Waterbirds [A999] 	<p>There is no direct spatial overlap between the works area and this SPA. Site survey evidence and historical records determine the proposed development site is not a terrestrial area utilised by field feeding wildfowl and/or waterbirds.</p> <p>The proposed development will not restrict bird mobility between wetland sites nor affect migratory flight paths and there will be no likely significant effects on SPA bird populations from potential collision with the development. As such the proposed development will have no effect on any ex-situ waterbirds from the SPA</p>
<p>Dalkey Islands SPA c. 6.4km (004172)²⁰</p>	<ul style="list-style-type: none"> ▪ Roseate Tern (<i>Sterna dougallii</i>) [A192] ▪ Common Tern (<i>Sterna hirundo</i>) [A193] ▪ Arctic Tern (<i>Sterna paradisaea</i>) [A194] 	<p>No</p> <p>Dalkey Islands SPA is designated for the conservation of a number of breeding tern species, including Roseate tern. Colonies off Dublin support a significant proportion of the north-eastern Atlantic breeding population of Roseate tern (e.g. Rockabill SPA).</p> <p>There is no direct overlap between the proposed development and this SPA. The proposed development site does not accommodate any habitat that would provide for suitable nesting sites for terns.</p> <p>Terns feed within the marine environment on aquatic species and do not feed in terrestrial sites and as such the proposed development site does not provide for tern foraging habitats.</p> <p>The proposed development is sufficiently remote (c. 6.4km) so as to negate disturbance related impacts on tern populations accommodated within the SPA.</p> <p>With urbanization, collision with man-made structures, such as buildings and windows, has become a major threat for birds. A key consideration is the location of the structure and how birds</p>

²⁰ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004172.pdf



will fly through the wider landscape. In the case of tern species, the movements would be expected to be within the marine environment, along the shoreline or along estuaries. The proposed development does not proffer marine habitats or habitats suitable for terns. The proposed development and associated taller buildings does not lie between habitats suitable for terns so regular or repeated passage across the proposed development site by terns will not occur. The migratory flight paths of terns will not be inland across the proposed development towards the Wicklow Mountains. As such, it is considered, the proposed development will not impact upon the migratory flight paths of SPA species nor restrict their mobility between wetland sites and there will be no likely significant effects on QI terns species from collision risk.

The location, scale and operation of the proposed development is such that it will not contribute to direct, indirect or in-combination impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.

This site is not considered further.

Wicklow Mountains c. 7.7km
SPA (004040)²¹

- Merlin (*Falco columbarius*) [A098]
- Peregrine Falcon (*Falco peregrinus*) [A103]

No

Wicklow Mountains SPA is designated for the conservation of merlin and peregrine falcon.

There is no direct overlap between the proposed development and this SPA, nor does the proposed development site accommodate habitat that would provide for suitable nesting sites for these species. The proposed development is sufficiently remote so as to negate disturbance related impacts on nesting birds accommodated within the SPA.

²¹ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004040.pdf



				<p>While during the winter months both merlin and peregrine falcon move to coastal wetlands to hunt, the former Bray Golf Club lands would not be seen as optimal hunting habitat by either species. The proposed development site in Bray is considered unlikely to have an impact on ex-situ hunting by either species which is nesting in the Wicklow Mountains.</p> <p>Falcons are agile flyers with high levels of visual acuity and BirdWatch Ireland identify Peregrines; 'Breeding on cliff faces and in recent years migrating into cities and nesting on taller buildings' Given their agility, acuity and their adaptability and propensity to the urban environment, the proposed development do not pose a collision risk to the falcon populations of the SPA.</p> <p>The location, scale and operation of the proposed development is such that it will not contribute to direct, indirect or in-combination impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>
North-West Sea (004236) ²²	Irish SPA	c. 14.5km	<ul style="list-style-type: none"> ▪ Red-throated Diver (<i>Gavia stellata</i>) [A001] ▪ Great Northern Diver (<i>Gavia immer</i>) [A003] ▪ Fulmar (<i>Fulmarus glacialis</i>) [A009] ▪ Manx Shearwater (<i>Puffinus puffinus</i>) [A013] ▪ Cormorant (<i>Phalacrocorax carbo</i>) [A017] ▪ Shag (<i>Phalacrocorax aristotelis</i>) [A018] ▪ Common Scoter (<i>Melanitta nigra</i>) [A065] ▪ Little Gull (<i>Larus minutus</i>) [A177] 	<p>No</p> <p>North-west Irish Sea SPA is designated for a wide range of wintering and breeding waterbirds.</p> <p>There is no direct overlap between the works area and this SPA. The proposed development is sufficiently remote that there is no risk of disturbance to waders, wildfowl and waterbirds using the SPA. The proposed development will not impact upon the migratory flight paths of SPA species nor restrict their mobility between wetland sites.</p>

²² https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004236.pdf



-
- Black-headed Gull (*Chroicocephalus ridibundus*) [A179]
 - Common Gull (*Larus canus*) [A182]
 - Lesser Black-backed Gull (*Larus fuscus*) [A183]
 - Herring Gull (*Larus argentatus*) [A184]
 - Great Black-backed Gull (*Larus marinus*) [A187]
 - Kittiwake (*Rissa tridactyla*) [A188]
 - Roseate Tern (*Sterna dougallii*) [A192]
 - Common Tern (*Sterna hirundo*) [A193]
 - Arctic Tern (*Sterna paradisaea*) [A194]
 - Little Tern (*Sterna albifrons*) [A195]
 - Guillemot (*Uria aalge*) [A199]
 - Razorbill (*Alca torda*) [A200]
 - Puffin (*Fratercula arctica*) [A204]

Common gull, a QI of this SPA, was noted during 2024 surveys in small numbers (40) within the Masterplan lands, this species is common and very widespread throughout the Irish coastline and coastal towns. Common gull, being highly habitualised to the urban environment, will not be affected by the proposed development.

I-WeBs data records relatively low numbers of some of the SPA waterbird species (predominantly gulls, refer to Table 4-1) within the Bray Harbour count site, however these sightings are confined the aquatic environment, coastal / estuarine waters and not the proposed development site. The proposed development site does not provide any suitable habitat for offshore species such as Divers, Terns or Auk species.

The proposed development is not a terrestrial area utilised by field feeding wildfowl and/or waterbirds. Given the location of this SPA relative to the proposed development site (c. 14.5km at closest point) there will no passage or migratory flight paths of QI species to or from the North-west Irish Sea SPA across the proposed development site.

The location, scale and operation of the proposed development is such that it will not contribute to direct, indirect or in-combination impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.

This site is not considered further





Figure 5-1 - SACs within the potential ZOI of the proposed development.

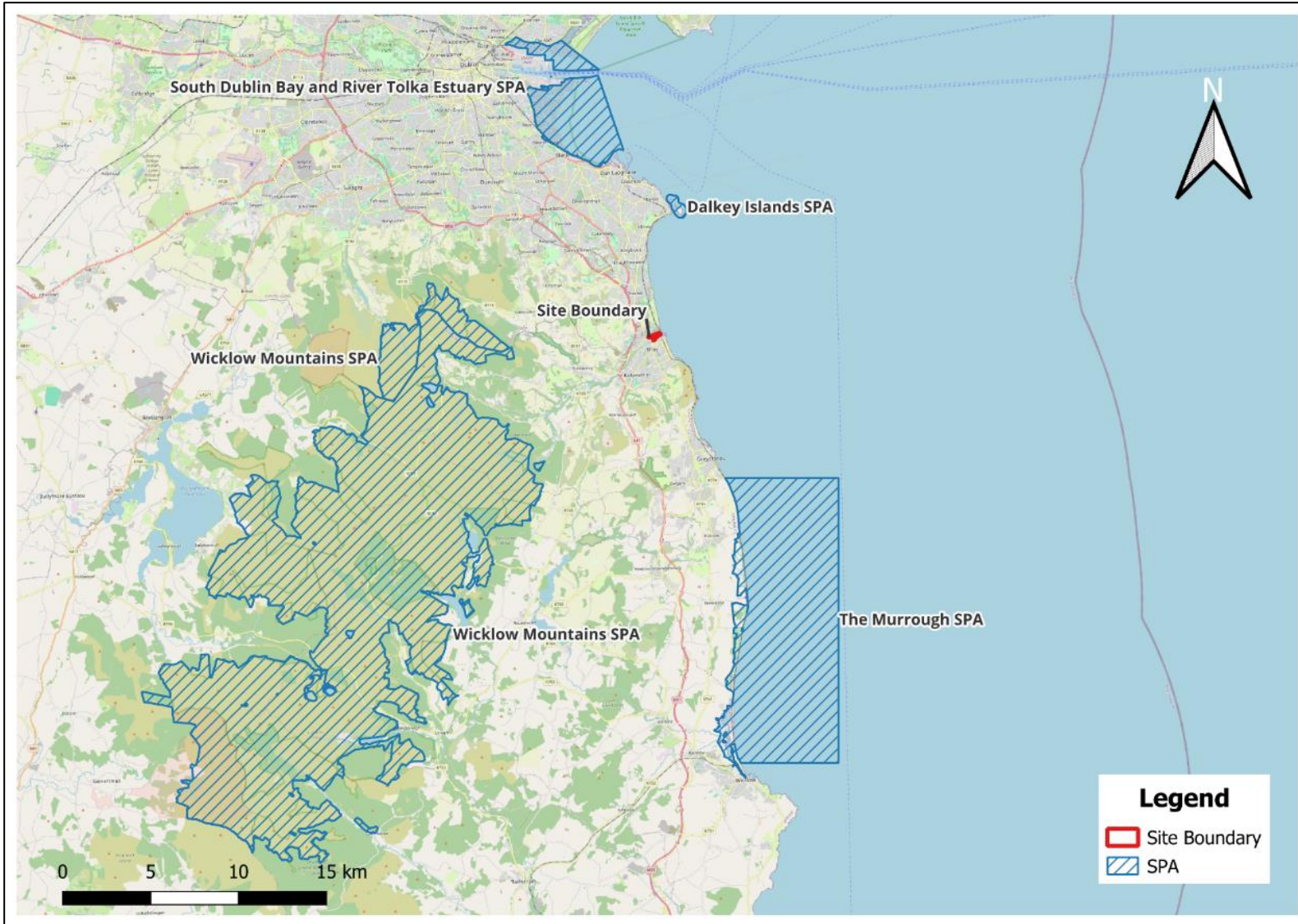


Figure 5-2 - SPAs within the potential ZOI of the proposed development.

5.2 Brief Description of Rockabill to Dalkey Island SAC

A synopsis of the SAC, as detailed by NPWS, is as follows ²³:

“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, Muggins 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 foliacea*, *Alaria esculenta*, *Halidrys siliquosa*, *Pomatocereos triqueter*, *Alcyonium digitatum*, *Metridium senile*, *Caryophyllia smithii*, *Tubularia indivisa*, *Mytilus edulis*, *Gibbula umbilicalis*, *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. Bottle-nosed 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.”

²³ <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY003000.pdf>



5.2.1 Conservation Objectives of Rockabill to Dalkey Island SAC

The conservation objectives for the and the list of specific attributes and targets defining the conservation objectives for each feature of interest can be found on the NPWS website (last accessed 02/04/2025, NPWS, 2013). The conservation objectives for the SAC are;

- To maintain the favourable conservation condition of Reefs in Rockabill to Dalkey Island SAC.
- To maintain the favourable conservation condition of Harbour porpoise in Rockabill to Dalkey Island SAC

5.2.2 Potential Threats

The threats, pressures and activities with impacts on the SAC²⁴ are listed below in Table 5.3.

Table 5-3 - Threats, Pressures and activities with impacts on Rockabill to Dalkey Island SAC.

Rank	Threats and Pressures (Type)
L	Removal of sediments
H	Shipping Lanes
H	Discharges
M	Utility and service lines
H	Noise nuisance, noise pollution
H	Professional active fishing
L	Siltation rate changes, dumping, depositing of degraded deposits

5.3 Brief Description of Wicklow Mountains SAC

A synopsis of the SAC, as detailed by NPWS, is as follows ²⁵:

“Wicklow Mountains SAC is a complex of upland areas in Counties Wicklow and Dublin, flanked by the Blessington reservoir to the west and Vartry reservoir in the east, Cruagh Mountain in the north and Lybagh Mountain in the south. Most of the site is over 300 m, with much ground over 600 m. The highest peak is 925 m at Lugnaquilla. The Wicklow uplands comprise a core of granites flanked by Ordovician schists, mudstones and volcanics. The form of the Wicklow Glens is due to glacial erosion. The topography is typical of a mountain chain, showing the effects of more than one cycle of erosion. The massive granite has weathered characteristically into broad domes. Most of the western part of the site consists of an elevated moorland, covered by peat. The surrounding schists have assumed more diverse outlines, forming prominent peaks and rocky foothills with deep glens. The dominant topographical features are the products of glaciation. High corrie lakes, deep valleys and moraines are common features of this area. The substrate over much of the area is peat, usually less than 2 m deep. Poor mineral soil covers the slopes, and rock outcrops are frequent. The Wicklow Mountains are drained by several major rivers including the Dargle, Liffey, Dodder, Slaney and Avonmore. The river water in the mountain areas is often peaty, especially during floods.”

²⁴ <https://biodiversity.europa.eu/sites/natura2000/IE0003000>

²⁵ <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY002122.pdf>



The vegetation over most of Wicklow Mountains SAC is a mosaic of heath, blanket bog and upland grassland (mostly on peaty soil, though some on mineral soil), stands of dense Bracken (*Pteridium aquilinum*), and small woodlands mainly along the rivers. Mountain loughs and corrie lakes are scattered throughout the site.

Blanket bog is usually dominated by cottongrasses, Heather and bog mosses. On steeper slopes there is some flushing and here Purple Moor-grass, Heath Rush and certain Sphagnum species become more common. The Liffey Head blanket bog is among the best of its kind in eastern Ireland, with deep peat formations and an extensive system of dystrophic pools developed among the hummocks and hollows on the bog surface. The vegetation is largely dominated by Heather and Cross-leaved Heath, with cottongrasses (*Eriophorum vaginatum* and *E. angustifolium*), Deergrass (*Scirpus cespitosus*) and Bog Asphodel (*Narthecium ossifragum*). In drier areas, Bilberry and Cowberry (*Vaccinium vitis-idaea*) are common, while the scarce Bog-rosemary (*Andromeda polifolia*) is also found. Blanket bog occurs over extensive areas of deeper peat on the plateau and also on gentle slopes at high altitudes.

Due to the underlying rock strata, the water of the rivers and streams is acid rather than alkaline. The water is generally oligotrophic and free from enrichment. The lakes within the area range from the high altitude lakes of Lough Firrib and Three Lakes, to the lower pater-noster lakes of Glendalough, Lough Tay and Lough Dan. Spectacular corrie lakes, such as Loughs Bray (Upper and Lower), Ouler, Cleevaun, Arts, Kellys and Nahanagan, exhibit fine sequences of moraine stages. The deep lakes are characteristically species-poor, but hold some interesting plants including an unusual form of Quillwort (*Isoetes lacustris* var. *morei*), a stonewort (*Nitella* sp.) and Floating Bur-reed (*Sparganium angustifolium*).

Small areas of old oakwood (*Blechno-Quercetum petraeae* type) occur on the slopes of Glendalough and Glenmalure, near Lough Tay and Lough Dan, with native Sessile Oak (*Quercus petraea*) trees, many of which are 100-120 years old. On wetter areas, wet broadleaved semi-natural woodlands occur which are dominated by Downy Birch (*Betula pubescens*). Mixed woodland with non-native tree species also occurs.

Mammals and birds which occur are typical of the uplands. Deer are abundant, mainly hybrids between Red and Sika Deer. Other mammals include Hare, Badger and Otter, the latter being a species listed on Annex II of the E.U. Habitats Directive. Pine Marten has recently been confirmed as occurring within the site. Among the birds, Meadow Pipit, Skylark, Raven and Red Grouse are resident throughout the site. Wheatear, Whinchat and the scarce Ring Ouzel are summer visitors. Wood Warbler and Redstarts are rare breeding species of the woodlands. Dipper and Grey Wagtail are typical riparian species. Merlin and Peregrine, both Annex I species of the E.U. Birds Directive, breed within the site. Recently, Goosander has become established as a breeding species.

Wicklow Mountains is important as a complex, extensive upland site. It shows great diversity from a geomorphological and a topographical point of view. The vegetation provides examples of the typical upland habitats with heath, blanket bog and upland grassland covering large, relatively undisturbed areas. In all, twelve habitats listed on Annex I of the E.U. Habitats Directive are found within the site. Several rare or protected plant and animal species occur, adding further to its value."

5.3.1 Conservation Objectives of Wicklow Mountains SAC

The conservation objectives for the and the list of specific attributes and targets defining the conservation objectives for each feature of interest can be found on the NPWS website (last accessed 02/04/2025, NPWS, 2017). The conservation objectives for the SAC are;



- To maintain the favourable conservation condition of Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) in Wicklow Mountains SAC
- To maintain the favourable conservation condition of Natural dystrophic lakes and ponds in Wicklow Mountains SAC
- To restore the favourable conservation condition of Northern Atlantic wet heaths with *Erica tetralix* in Wicklow Mountains SAC
- To restore the favourable conservation condition of European dry heaths in Wicklow Mountains SAC
- To restore the favourable conservation condition of Alpine and Boreal heaths in Wicklow Mountains SAC
- To maintain the favourable conservation condition of Calaminarian grasslands of the *Violetalia calaminariae* in Wicklow Mountains SAC
- To restore the favourable conservation condition of Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)* in Wicklow Mountains SAC
- To restore the favourable conservation condition of Blanket bogs (* if active bog) in Wicklow Mountains SAC
- To restore the favourable conservation condition of Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) in Wicklow Mountains SAC
- To restore the favourable conservation condition of Calcareous rocky slopes with chasmophytic vegetation in Wicklow Mountains SAC
- To restore the favourable conservation condition of Siliceous rocky slopes with chasmophytic vegetation in Wicklow Mountains SAC
- To restore the favourable conservation condition of Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles in Wicklow Mountains SAC
- To maintain the favourable conservation condition of Otter in Wicklow Mountains SAC

5.3.2 Potential Threats

The threats, pressures and activities with impacts on the SPA²⁶ are listed below in Table 5.4.

Table 5-4 - Threats, Pressures and activities with impacts on Wicklow Mountains SAC.

Rank	Threats and Pressures (Type)
H	Burning down
H	Erosion
H	Grazing in forests/ woodland
H	Invasive non-native species
H	Off-road motorized driving
M	Damage by herbivores (including game species)
M	Grazing
M	Hunting and collection of wild animals (terrestrial)
M	Military manoeuvres
M	Missing or wrongly directed conservation measures

²⁶ <https://biodiversity.europa.eu/sites/natura2000/IE0002122>



M	Outdoor sports and leisure activities, recreational activities
M	Paths, tracks, cycling tracks
M	Peat extraction
M	Taking from nest (falcons)
M	Trampling, overuse,
M	Urbanised areas, human habitation
M	Vandalism
M	Walking, horseriding and non-motorised vehicles
L	Collapse of terrain, landslide
L	Collection (fungi, lichen, berries etc.)
L	Disposal of household / recreational facility waste
L	Mountaineering, rock climbing, speleology
L	Stock feeding
L	Tree surgery, felling for public safety, removal of roadside trees
L	Wildlife watching

5.4 Identification of Potential Impacts on Natura 2000 sites

5.4.1 Construction Phase

Direct Impacts

The proposed development does not occur within or directly adjacent to Rockabill to Dalkey islands SAC or Wicklow Mountains SAC and as such there will be no direct impacts to these SACs; i.e. no displacement of species, or the permanent removal of habitat supporting qualifying interest and ecological features of the designated site.

Indirect Impacts

Storm water drainage infrastructure for the Block A development has already been constructed as part of the granted Phase 1 housing development (ABP-311181-21). As such, the construction phase of Block A does not necessitate or involve any interaction with the River Dargle which is located c. 225m south of the red line boundary of the proposed development. In addition, a flood defence wall and promenade act as physical barrier between the proposed development and the River Dargle so there is no potential for any contaminated surface water run-off from the construction site to reach the River Dargle. Given these factors, potential negative effects on the surface water quality of the River Dargle as a result of construction phase surface water run-off is precluded.

Excavation works on the proposed development site can interact with groundwater and have the potential to expose groundwater to contamination to by concrete, hydrocarbons and other chemicals used in construction. Temporary dewatering will likely be required during excavation in portions of the proposed development, however there will be no discharge to the River Dargle from any dewatering activities. Significant impacts to groundwater quality or flow during the construction phase are not likely. Any potential impacts on groundwater as a result of



construction activities will not likely affect the surface water quality in the River Dargle or the coastal water quality in the Irish Sea.

In summary, given the location, nature and scale of the proposed development, potential impacts from contaminated surface water run-off or through groundwater pathways which could affect the conservation objectives of QI species harbour porpoise or otter are not considered likely. It can be safely concluded that the construction phase of the proposed development will have no effect on Wicklow Mountains SAC, Rockabill to Dalkey Islands SAC or any other Natura 2000 site.

5.4.2 Operational Phase

Direct Impacts

The proposed development does not occur within or directly adjacent to Rockabill to Dalkey islands SAC or Wicklow Mountains SAC and as such, during the usage of the development, there will be no direct impacts to this SAC; i.e. no displacement of species, or the permanent removal of habitat supporting qualifying interest and ecological features of the designated site.

Surface Water Drainage

During the operational phase of Block A surface water / rainfall from the proposed development site will outfall to the River Dargle. Rainfall run-off from the proposed development site will be treated (swales / filter drains / bypass interceptor) and attenuated prior to discharge and as such will not result in any significant water quality impacts to the river. Given that no adverse water quality impacts are anticipated, there will be no effects to QI species otter or harbour porpoise or their prey species from surface water run-off whilst the development is occupied and in use.

It can be safely concluded that there will be no likely significant effects to the qualifying interests of Rockabill to Dalkey Island SAC, Wicklow Mountains SAC, or any other Natura 2000 site from surface water drainage when the development is in use.

Foul Water Drainage

During the operational phase of the development the foul water generated from the development will discharge into the local foul water network. The local foul water network is connected to the Shanganagh WwTP which has been recently upgraded and as such can accommodate the additional load to the network. Treated outfall from Shanganagh WwTP is to the Irish Sea and as such the potential for the treated effluent from the proposed development to impact Rockabill to Dalkey Island SAC is considered.

The Shanganagh WwTP has been subject to the Appropriate Assessment process. The associated Natura Impact Statement concluded:

“it is envisaged there will be no significant adverse effects on the integrity of Rockabill to Dalkey Island SAC or Dalkey Island SPA, in view of these sites conservation objectives and the conservation status of the Annex I habitat, Annex II species and protected bird species will not be compromised by the WwTP discharge either directly, indirectly or cumulatively.”

Therefore, no impacts are anticipated on the qualifying interests of Rockabill to Dalkey Island SAC from foul discharge from the operational phase of the proposed development given effluent will be treated at Shanganagh WwTP prior to discharge and given the dilution and dispersal which will occur within the Irish Sea.



5.5 In-combination Effects

5.5.1 Requirement for Assessment

The requirement for AA arising out of Article 6(3) of the Habitats Directive covers plans and projects that, “*either individually or in combination with other plans or projects*”, are likely to have a significant effect on one or more Natura 2000 sites. This means that AA is required for any plan or project that, in combination with other plans or projects, would have a significant effect on one or more Natura 2000 sites, irrespective of the presence or absence of such effects from that plan or project on its own. Therefore, regardless of the significance of the effects of the plan or project individually, the potential for significant effects in combination with other plans and projects must be considered in all cases.

5.5.2 Approach and Methodology

The objective of this requirement is to capture significant effects potentially arising from the cumulation or other interaction of non-significant effects from multiple plans and projects. Consequently, the assessment of potential in-combination effects is not a pair-wise assessment, rather, it considers the totality of the effects arising from all plans and projects affecting the Natura 2000 site(s) in question. In identifying the plans and projects to be included in this assessment, it is important to define an appropriate geographical scope and timescale over which potential in-combination effects are to be considered and the sources of information to be consulted, as described below. It is also important to consider the nature of the interactions between effects, which may be additive, antagonistic, synergistic or complex.

5.5.3 Geographical Scope

In defining the geographical scope for identifying potential in-combination effects, it is important to remember that effects are evaluated in view of the conservation objectives of the Natura 2000 site(s) concerned. As such, two or more effects relating to the same conservation objective for a given Natura 2000 site would combine even if their geographical extents did not overlap. For example, the loss of a small area of an Annex I habitat type listed as a qualifying interest of a Natura 2000 site would combine with the loss of an entirely unconnected area of the same habitat type from a remote part of the same site to produce an in-combination effect, the significance of which would need to be evaluated in view of the relevant conservation objective. On that basis, the scope of the assessment of in-combination effects extends to all plans and projects affecting the same conservation objectives as the plan or project under consideration, irrespective of whether those effects are significant or not.

In this case, however, given the scale of the proposed development and sensitivities of the Natura 2000 sites in its Zol, it was deemed most appropriate to include areas in close proximity to the proposed development and its Zol (as described in Section 5.1) within the geographical scope for identifying potential in-combination effects.

5.5.4 Timescale

The timescale over which potential in-combination effects were considered in this case covered plans and projects from 5 years ago to the present and all reasonably foreseeable future plans and projects, i.e. published draft plans and projects which are already in the planning system or have received planning permission.

5.5.5 Sources of Information

The following sources of information were consulted to gather information on other plans and projects:



- Dún Laoghaire-Rathdown County Council Planning Data viewed through;
<https://dlrcocouncil.maps.arcgis.com/apps/webappviewer/index.html?id=af21eeb123224c4c877f410139ed1e69>
- Wicklow County Council Planning Data viewed through;
<https://wiclowlow.maps.arcgis.com/apps/webappviewer/index.html?id=57b22c27e7c049fbac54117da1a20f60>
- An Bord Pleanála Planning Applications viewed through;
<https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>
- Dún Laoghaire Rathdown County Development Plan 2022-2028²⁷
- Transport Infrastructure Ireland²⁸
- Irish Water²⁹

The threats, pressures and activities with negative impacts on the Rockabill to Dalkey Island SAC and Wicklow Mountains SAC were used to identify plans and projects which, by their nature, are likely to give rise to potential impacts on the sites concerned.

5.5.6 Assessment

Dún Laoghaire Rathdown County Development Plan (CDP) sets out policies and objectives for the development of the county. The CDP aims to promote the sustainable development and improvement of the economic, environmental, cultural and social aspects of Dún Laoghaire Rathdown. The CDP also requires that any developments must be subject to AA process and that permitted developments comply with the requirements of the WFD, the relevant River Basin Management Plans and the Habitats Directive. A Strategic Environmental Assessment (SEA) was prepared for the CDP and it went through the AA process. The findings of which were integrated into the objectives of the CDP resulting in a plan that affords high levels of protection to the environment and Natura 2000 sites.

A review of Transport Infrastructure Ireland (TII) publicly available planned projects³⁰ did not identify any major road projects within 10km of the proposed development.

A review of Uisce Éireann (Irish Water) projects³¹ identified 1 no. water project in the vicinity of the proposed development. This project is detailed in Table 5-5 below.

A search of Dún Laoghaire-Rathdown County Council planning applications, Wicklow County Council planning applications and An Bord Pleanála planning applications has been undertaken for applications submitted within the last 5 years in the vicinity the proposed development (last accessed 28/04/2025). Near the proposed works, projects that have been granted planning permission include retention of existing developments, typical extensions to domestic dwellings or the construction of new domestic dwellings. Regarding potential impacts to water quality, these projects will connect foul water and surface water outfalls to the local foul and storm water networks. Therefore, it is not anticipated that the developments that have been granted permission will have any

²⁷ <https://www.dlrcoco.ie/CDP2022-2028>

²⁸ <https://www.tii.ie/projects/>

²⁹ <https://www.water.ie/projects/>

³⁰ <https://www.tii.ie/public-transport/projects-and-improvements/>

³¹ <https://www.water.ie/projects/?map=our-projects&id=627>



hydrological connectivity to the proposed development nor significant effects in combination with the proposed development.

Key developments which shall be considered are large-scale developments in the region of the proposed development, there are 13 no. of these developments which have been further assessed in terms of in-combination effects with the proposed development and are presented in Table 5-5 below.

Future projects - Bray Sustainable Transport Bridge

A new bridge over the River Dargle, the Bray Sustainable Transport Bridge, is being proposed by Wicklow County Council (WCC). The location of this bridge is c. 230m from the proposed development site. WCC detail that this bridge is still at design stage³² and as such bridge construction works will not occur at the same time as the proposed development. It is noted that the development and design of this bridge will necessitate an Environmental Impact Assessment Report³³ (EIAR) with associated environmental mitigation measures and surface water protection measures as works will be occurring directly within and across the river channel. Given that the bridge works will not occur at the same time as the proposed development and that the Bray Sustainable Transport Bridge, should it proceed, will require surface water protection measures and given that the proposed development will not result in any significant water quality impacts to the River Dargle, it is considered that the two proposed projects will not act in combination to give rise to likely significant effects on any Natura 2000 site.

Sea Gardens Masterplan

'The proposed development site forms part of a larger landholding within the Applicant's ownership that is currently being developed as Sea Gardens (formerly Coastal Quarter and River Quarter). This 18 hectare wider landholding is located to the west of the Dublin to Rosslare railway corridor and Bray Harbour, south of Corke Abbey Valley Park, north of the Dargle River and Bray town centre, and east of the Ravenswell schools campus.

Given the size and strategic location of the wider landholding a Masterplan Design Document has been prepared by Howells (2025). Ballymore commissioned the masterplan to guide the development of the former Bray Golf Club lands in recognition of the strategic significance and size of the landholding. It is intended as an overarching document setting out key design principles and illustrating a structured framework for the development of the overall landholding in a clear, logical and transparent manner as each phase is permitted and implemented.

Construction works are ongoing to the immediate west of the Block A site as Phase 1 A known as Shoreside Park is currently nearing completion with the residences having been occupied in Phases from mid-2024 (Ref. ABP-311181-21). Therefore the proposed development (Block A) will be carried out in a consecutive manner and will not run concurrently with the existing Shoreside park phase of development. It is not anticipated to have any cumulative effects with the construction of Block A.

The proposed development at the adjacent site directly to the south; Block B, will be subject to a future planning application and therefore it is not likely that both Block A and B will be constructed at the same time. It is also noted that the combined number of residential units between Block A and B are 334 so still cumulate to a minor housing development.

Phase 2 referred to as River Quarter Phase 2, has been recently submitted to Wicklow County Council for planning permission and is located ca. 125m south of Block A. A comprehensive EIAR was submitted as part of

³² <https://storymaps.arcgis.com/stories/a6c4464a6898496992df9092ed1bd358v>

³³ <https://www.pleanala.ie/en-ie/case/320608>



this application which verified that no likely significant effects to the receiving environment will occur. Phase 2 is expected to start construction 6 months after granted permission. Sea Gardens Phase 2 development has been subject to the Appropriate Assessment process and mitigation measures have been prescribed to offset any potential impacts on the River Dargle. The Natura Impact Statement for the Phase 2 development concludes; *'Following a comprehensive evaluation of the potential direct, indirect and cumulative impacts on the qualifying interests of Rockabill to Dalkey Island SAC and Wicklow Mountains SAC and the implementation of the proposed mitigation measures, it has been concluded by the authors of this report that there will be no residual impacts and the proposed project will not have an adverse effect on the integrity of the Rockabill to Dalkey Island SAC, Wicklow Mountains SAC or any other European site.'* Given that no likely significant effects are considered likely from the Sea Gardens Phase 2 development nor the proposed Block A development, there will be no likely in-combination effects as a result of the two developments

Finally Phase 3, located directly south of Phase 2 ca. 230m from Block A, marks the final stage of the Sea Gardens masterplan, and will be submitted as a future planning application. Based on current programme Block A construction will be complete in advance of the commencement of Phase 3 construction.

Operational phase cumulative effects as a result of the development of the masterplan lands will likely be not significant given that the design and environmental assessment of each phase of the masterplan development have considered the masterplan lands as a whole. For example a Daylight and Sunlight Assessment has been prepared for the development accompanying this submission (3DDB, 2025). The report examined the level of impact from a daylight and sunlight perspective that the updated design would have on the granted SHD 2 Block B (ABP -314686-22) as well as the currently under construction duplexes to the west and found the impact is limited to the approved SHD 2 Block B, with results for the duplexes all presenting as fully compliant.

Summary

It is considered that there are no An Bord Pleanála or Council approved or planned developments or projects that will act in combination with the proposed development to give rise to significant in-combination effects on the Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other Natura 2000 site.



Table 5-5 - Planning applications near the proposed development.

Ref. No.	Project Applicant	Project Summary	In-combination Assessment
ABP - 30584419	Aeval Ltd	A planning permission for a strategic housing development on a site of 21.9 hectares generally bounded by the Old Dublin Road (R119) and St. James (Crinken) Church to the west, Shanganagh Public Park and Shanganagh Cemetery to the north, Woodbrook Golf Course to the east and Corke Lodge and woodlands and Woodbrook Golf Clubhouse and car park to the south. The proposed development is within the townlands of Cork Little and Shanganagh, Shankill, County Dublin.	<p>This project has been subject to the Appropriate Assessment Screening Process which concludes:</p> <p><i>'It is concluded within the Appropriate Assessment Screening that the proposed development will have no significant impacts upon any Natura 2000 sites. Having regard to the 'source-pathway-receptor' model and lack of any direct entry of surface and untreated waste waters to any of the Natura 2000 sites, the use of best construction practices as an integral component of the development and the treatment of waste waters prior to discharge, the proposal either individually or in-combination with other plans or projects could not be considered to have likely significant effects in view of the sites' conservation objectives.'</i> – Inspectors Report</p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
Wicklow CC - 22188	Shankill Property Investments Ltd	Demolition of 4 light industrial/commercial buildings including their extensions, change of use from light industrial/commercial to residential use, and the construction of a total of 54 no. apartment units across 2 no. blocks	<p>This project has been subject to a Natura Impact Statement which concludes:</p> <p><i>'it has been concluded by the authors of this report that there will be no residual impacts and the proposed project will not have an adverse effect on the integrity of the Rockabill to Dalkey Island SAC or any other Natura 2000 site. - Atkins</i></p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
ABP - 313442	Silverbow Ltd	Demolition of existing buildings, construction of 139 no. apartments, creche and associated site works.	<p>This development has been subject to the Appropriate Assessment process which concluded;</p> <p><i>'on the basis of the best scientific knowledge available, that the possibility of any significant effects on any Natura 2000 sites, whether</i></p>



arising from the project itself or in combination with other plans and projects, can be excluded.’ – Enviroguide Consulting

Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.

ABP - 306583	Dún Laoghaire Rathdown County Council	A residential development with ancillary commercial uses (retail unit, café and crèche) partially comprising a "Build to Rent" scheme on circa 9.69 hectares.	<p>This development has been subject to the Environmental Impact Assessment process which stated</p> <p><i>‘The AA Screening Report concluded that there would be no Likely Significant Effects on any European designated sites, either alone or in-combination with other plans or projects’</i> - HRA Planning</p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
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ABP - 317742	National Transport Authority	BusConnects Bray to City Centre Core Bus Corridor Scheme	<p>This development has been subject to the Appropriate Assessment process, in which the Natura Impact Statement concluded</p> <p><i>‘It has been objectively concluded by Scott Cawley Ltd., following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the Proposed Scheme and the effective implementation of the mitigation measures proposed that the Proposed Scheme will not adversely affect (either directly or indirectly) the integrity of any Natura 2000 site, either alone or in combination with other plans or projects, and there is no reasonable scientific doubt in relation to this conclusion’</i> – Jacobs/ARUP/SYSTR</p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
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Wicklow CC - 21869	Wicklow County Council	Part 8 - Process for the Bray Sustainable Transport Bridge Project - The proposed bridge and link road will consist of a two-lane public transport road 3.25m wide and variable width	<p>This development has been subject to the Appropriate Assessment process, in which the AA Screening Report concluded:</p> <p><i>‘The proposed development, alone or in combination with other projects, is not likely to have significant effects on Natura 2000 sites in</i></p>
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			pedestrian, cyclist and shared path facilities. A new pedestrian boardwalk is proposed along the southern bank wall to link the existing walkway to the bridge crossing.	<p><i>view of their conservation objectives. It has been determined by Arup that it is possible to rule out likely significant impacts on any Natura 2000 sites. It is the view of Arup that it is not necessary to undertake any further stage of the Appropriate Assessment process.’ – ARUP</i></p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
Dún Rathdown LRD24A/0482/WEB	Laoghaire- CC Ref:	Castlethorn Management Services UC	Castlethorn Management Services UC Intends to apply for a Permission for a Large-Scale Residential Development comprising amendments to the permitted Strategic Housing Development (An Bord Pleanála Ref. ABP-305844-19 – Woodbrook Phase 1)	<p>This development has been subject to the Appropriate Assessment process, in which the AA Screening Report concluded:</p> <p><i>“The Article 6(3) Appropriate Assessment Screening Report prepared as part of this application concluded that the possibility of any significant effects on any Natura 2000 sites, whether arising from the project alone or in combination with other plans and projects, can be excluded.” - Brady Shipman Martin</i></p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
Dún Rathdown LRD24A/0382/WEB	Laoghaire- CC Ref:	Aeval Unlimited Company	The proposed development is referred to as Woodbrook Phase 2 and consists of 479no. dwellings in a mixture of terraced and semi-detached houses, duplexes and apartments and a Neighbourhood Centre, ranging in height from 1 – 7 storeys	<p>This development has been subject to the Appropriate Assessment process, in which the AA Screening Report concluded:</p> <p><i>“there would be no likely significant effects on any Natura 2000 site as a result of the Proposed Development, either alone or in combination with other plans or projects (see Section 6.5.1).” - Brady Shipman Martin</i></p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
Dún Rathdown D18A/0606	Laoghaire- CC Ref:	Uisce Éireann	Permission is sought for provision of water supply infrastructure. The development will consist of: A 10 year permission to facilitate construction in two phases.	<p>This water supply scheme project is currently under construction and will be completed in advance of the proposed development. As such there is no potential for the two projects to act in combination to result in effects to Natura 2000 sites.</p>



D21A/0654	Lidl GmbH	Ireland	Permission for development comprising of the expansion and reconfiguration of the existing Lidl premises and associated external and site works and development. The proposed development comprises: 1) The demolition of enclosed former entrance porch area (to the front / southwest elevation) of the existing structure at upper ground floor level and existing external staircase to south east elevation at lower and upper ground floor level; 2) The modification of the front / southwest elevation to the Dublin Road, with revised glazing, cladding and signage arrangement; 3) The extension of the building to the south east at lower and upper ground level including to enclose / internalise the existing canopied / covered traveller area and associated landing and trolley storage areas, along with provision of internal elevator and staircase	<p>This Lidl project has no connectivity to the River Dargle nor the proposed development. The expansion of the Lidl building will have no effect on any Natura 2000 site.</p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
D22A/0574	Nypro Limited		Permission for the installation of 3,225 no. solar photovoltaic (PV) panels comprising an area of 5,965 sq. metres at roof level on the existing facility buildings and all ancillary and associated works (granted, 2022).	<p>This solar panel project has no connectivity to the River Dargle nor the proposed development. The installation of roof solar panels will have no effect on any Natura 2000 site.</p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
ABP- 2460793	Bray Property Development Limited		construction of a mixed-use building ranging in height from 4 to 6 storeys and accommodating 2 no. retail/café units fronting Castle Street and 29 no. apartments at ground to 5th floor levels. The development will include: A mix of 19 no. 1-bedroom and 10 no. 2-bedroom apartments all with private terraces/balconies; Communal open space to the rear at surface level;	<p>This development has been subject to the Appropriate Assessment process, in which the AA Screening Report concluded:</p> <p><i>'No major emissions to air, ground or water within the application site or surrounding area have been identified. The application site and proposed new building will be separated from the Bray Head SAC by a sufficient distance to nullify any potential direct or indirect construction or operational impact that may significantly affect the character,</i></p>



		Communal terrace at fifth floor roof level; 13 no. car parking spaces and 60 no. cycle parking spaces; Vehicular and pedestrian access from Castle Street; Bin stores, landscaping and all associated site works and services	<p><i>qualifying interests and conservation value of the protected habitats and species within. It has it been determined that the proposed development, alone or in combination with any other project or plan, likely to impede in achieving the conservation objectives of the Bray Head SAC.'</i></p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>
ABP-309613	Bravenhall Limited	Demolition of single storey structure. Change of use to residential/apartment use, totalling 54. Construction of 2 floors above building. Construction of 6 storey building as an extension (granted, 2022).	<p>This development has been subject to the Appropriate Assessment process, in which the AA Screening Report concluded:</p> <p><i>'Having regard to the nature and scale of the proposed development and the location of the site in a serviced urban area and the separation distance to the nearest European site, no Appropriate Assessment issues arise, and it is not considered that the development would be likely to give rise to a significant effect individually or in combination with other plans or projects on an European site.'</i></p> <p>Based on the scale and nature of this project, in-combination effects associated with the proposed development on Natura 2000 sites will not occur.</p>



5.6 Likelihood of Significant Effects on Natura 2000 Sites

The proposed development does not lie within, nor is it adjacent to any Natura 2000 sites and as such potential direct effects on Natura 2000 sites from the proposed development are precluded.

There is no indirect connectivity to any Natura 2000 site during the construction phase of the proposed development. As such the construction phase of the proposed development will have no effect on any Natura 2000 site.

During the operational phase of the proposed development, surface water drainage will outfall to the River Dargle and this river provides potential connectivity to two qualifying interest species: harbour porpoise and otter of Rockabill to Dalkey Islands SAC and Wicklow Mountains SAC respectively. No water quality impacts to the River Dargle are considered likely from rainfall run-off from the proposed development given the inclusion of filter drains, interceptors and attenuation within the existing infrastructure. There will be no significant water impacts to the river when the proposed development is in use. As such there can be no likely significant effects via this pathway on any qualifying interest otters or harbour porpoises that may be accommodated within the river and coastal waters.

Foul water from the proposed development will connect to the local foul water network with final treatment to be undertaken at Shanganagh WwTP. There will be no effects on any Natura 2000 site from foul water emissions when the development is in use.

5.7 Consideration of Findings

On the basis of objective information and in view of best scientific knowledge and applying a precautionary principle, it is concluded by the authors of this report that with the absence of any mitigation measures the proposed Sea Gardens Block A development, either alone or in-combination with other plans or projects, will not result in likely significant effects on Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other Natura 2000 site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment.

Should the scope, nature or extent of the proposed scheme change, a new assessment (AA Screening Report or AA Screening Addendum Report) would be required.



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