

March 2022

Appropriate Assessment – Stage 1 Screening Report

Proposed Residential Development

On behalf of
Orchid Residential

**Goatstown Road, Goatstown,
Dublin 14**



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Proposed Residential Development
Orchid Residential
Goatstown Road, Goatstown, Dublin 14**

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1 INTRODUCTION

1.1 Background

Malone O'Regan Environmental (MOR) were commissioned by Orchid Residential Ltd. to undertake an Appropriate Assessment Screening Report (AA) to assess the potential adverse effects, if any, of the proposed works on the Former Vector Motors Site, Goatstown Road, Goatstown, Dublin 14, D14 FD23, Co. Dublin (OS Reference: O 17802 28932) on nearby sites with European conservation designations (i.e., Natura 2000 sites).

The proposed works will involve the demolition of the existing showroom, garage buildings and hard surface parking area onsite in order to facilitate the construction of the proposed student accommodation building and associated site works (the 'Proposed Development'). The Proposed Development will span four (4No.) to six (6No.) storeys in sections and will consist of 221 No. student apartments.

The purpose of this assessment was to determine the appropriateness, or otherwise, of the proposed works in the context of the conservation objectives of Natura 2000 sites

The location of the Proposed Development ('the Site') is shown in Figure 1-1.

Figure 1-1: Site Location



1.2 Statement of Authority

The report was prepared by Ms. Jessica Beresford, Environmental Consultant. Jessica is a qualifying member of the Chartered Institute of Ecology and Environmental Management and has over a years' experience working in the ecological consultancy sector, including the preparation of Appropriate Assessments, habitat surveys and specialist protected species surveys.

This report was reviewed and approved by Mr. Dyfrig Hubble, Principal Ecologist. Dyfrig is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Dyfrig has over 15 years' experience working in the ecological consultancy sector, including habitat surveys and appraisals and specialist protected species surveys in support of Appropriate Assessments.

1.3 Regulatory Context

This Appropriate Assessment Screening Report was prepared in compliance with the following legislation:

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna is better known as "The Habitats Directive". The Habitats Directive provides the framework for legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000 sites. Included within this Natura 2000 network are Special Areas of Conservation (SACs), which are designated under the Habitats Directive and Special Protection Areas (SPAs), which are designated under the Conservation of Wild Birds Directive (79/409/EEC as amended 2009/149/EC) (better known as "The Birds Directive").

Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment:

"Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implication 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 Habitats Directive promotes a hierarchy of avoidance, mitigation, and compensatory measures. First, the project should aim to avoid any negative impacts on European sites by identifying possible impacts early in the planning stage and designing the project in order to avoid such impacts. Second, mitigation measures should be applied, if necessary, during the AA process to the point, where no adverse impacts on the site(s) remain. If the project is still likely to result in adverse effects, and no further practicable mitigation is possible, it must be rejected unless it follows the process established under Article 6(4). If the project is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effects.

1.4 Stages of Appropriate Assessment

This Appropriate Assessment Screening Report has been undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2021), the European Commission Guidance 'Managing Natura 2000 Sites' and the OPR Guidance 'Appropriate Assessment.

Screening for Development Management' (OPR, 2021) The Guidance for Planning Authorities published by the Department of Environment, Heritage and Local Government (DOEHLG, December 2009) was also adhered to.

Screening for Appropriate Assessment must be carried out without taking account of avoidance or preventative measures. There are four distinct stages to undertaking an AA as outlined in current EU and DOEHLG guidance:

1. Appropriate Assessment Screening;
2. Appropriate Assessment;
3. Assessment of Alternatives in cases where significant impact cannot be prevented; and,
4. Where no alternatives exist, an Assessment of Compensatory Issues in the case of projects or plans which can be considered to be necessary for Imperative Reasons of Overriding Public Interest (IROPI).

This Report comprises a Stage 1 Screening Report, which seeks to determine whether the subject site will, on its own or in combination with other plans / projects, have a significant effect on Natura 2000 sites within a defined radius of the subject site. It is confirmed that this screening exercise has been carried out without taking into account measures intended to avoid or reduce an impact on a European Site.

2 SCREENING FOR APPROPRIATE ASSESSMENT

Screening determines whether Appropriate Assessment is necessary by examining:

1. Whether a plan or project can be excluded from AA requirements because it is directly connected with, or necessary to, the management of a Natura 2000 site; and,
2. Whether the project will have a potentially significant effect on a Natura 2000 site, either alone or in combination with other projects or plans, in view of the site's conservation objectives.

Screening involves the following:

- i) Description of a plan or project;
- ii) Identification of relevant Natura 2000 sites, and compilation of information on their qualifying interests and conservation objectives;
- iii) Assessment of likely effects – direct, indirect, and cumulative – undertaken on the basis of available information as a desk study or field survey or primary research as necessary; and,
- iv) Screening Statement with conclusions.

2.1 Desk Based Studies

A desk-based review of information sources was completed, which included the following sources of information:

- The National Parks and Wildlife Service (NPWS) website was consulted with regard to the most up to date detail on conservation objectives for the Natura 2000 sites relevant to this assessment (NPWS, 2022);
- The National Biodiversity Data Centre (NBDC) website was consulted with regard to species distributions (NBDC, 2022); and,
- The Environmental Protection Agency (EPA) Envision website was consulted to obtain details about watercourses in the vicinity of the Site (EPA, 2022).
- The Dun Laoghaire Rathdown County Council Planning Portal to obtain details about existing / Proposed Developments in the vicinity of the Site (DLRCC, 2022)

2.2 Field Survey

A Site walkover was undertaken on the 23rd September 2021 by a MOR Senior Ecologist, to assess the onsite conditions and to identify any potential ecological receptors associated with the Natura 2000 sites.

2.3 Survey Limitations

No survey limitations were encountered.

3 DESCRIPTION OF THE PROJECT

3.1 Site Context and Description

The Proposed Development is located on a ca.0.34 hectares (ha) site, approximately 600m north of Goatstown town centre and ca.1km southwest of the UCD Belfield Campus. The Site currently comprises an existing car showroom building and a hard surface parking area. The Site is accessed off the R825 regional road which is located immediately to the west of the Site boundary.

The Site is zoned Objective 'A' "To provide residential development and/or protect and improve residential amenity" under the Dun Laoghaire Development Plan. The Site is located within a largely residential area and is surrounded by apartment complexes and housing estates. Directly to the south of the Site lies some local retail outlets.

3.2 Watercourses within the Vicinity of the Site

The Site is located within the Liffey and Dublin Bay catchment [Catchment_ID: 09] and the Dodder_SC_010 subcatchment [Subcatchment_ID: 09_16] (EPA, 2022).

No watercourses or drainage ditches were identified onsite during the Site walkover and according to the desk-top study, there are no surface waterbodies within 500m of the Site.

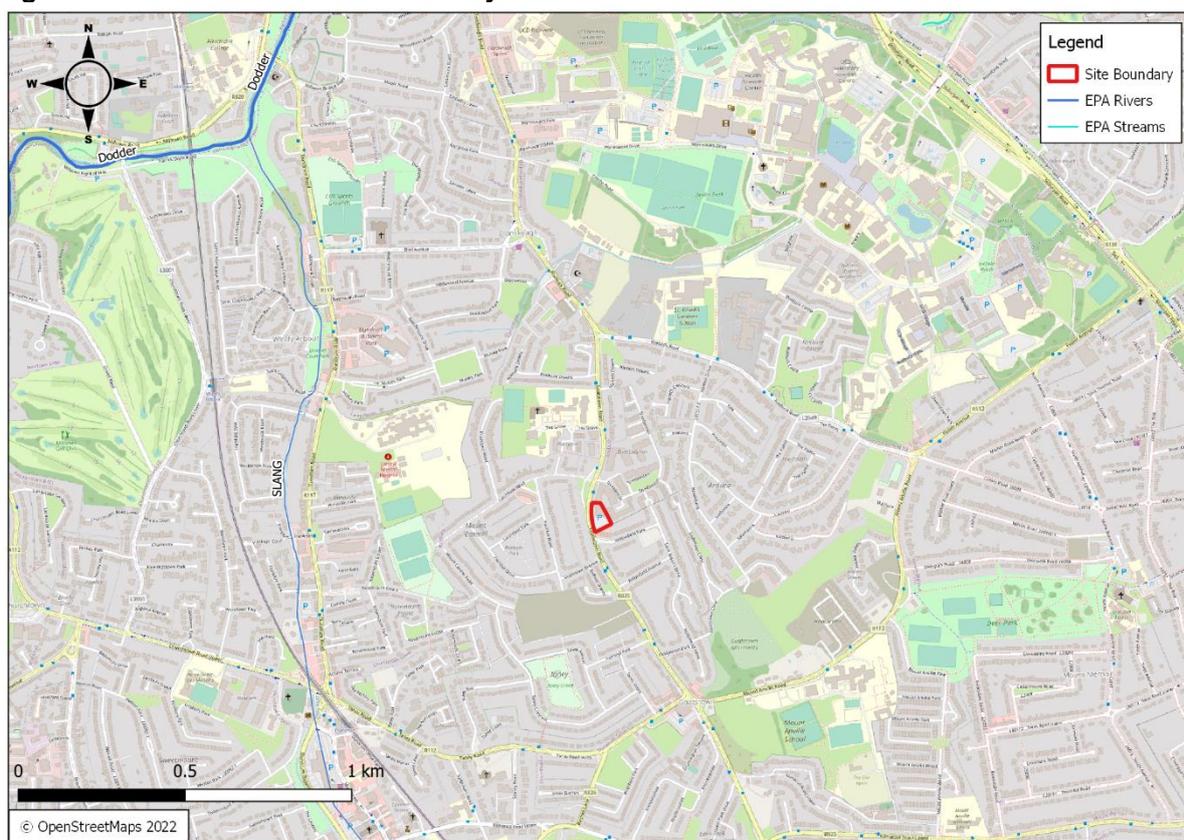
The nearest hydrological feature to the Site is an unmarked waterway ca.580m northwest at its closest point. However, there is no hydrological connection between the Site and this waterway. This waterway appears to be culverted in sections, flowing for ca.1.5km into a feature named 'The Lake' within the UCD Belfield Campus. This feature appears to discharge into the Elm Park Stream via an underground connection. The Elm Park Stream flows for a further 1.3km before discharging directly into Dublin Bay.

The River Slang is located ca.900m west of the Site. This river discharges into the River Dodder ca.1.5km downstream, which flows in a north-easterly direction for ca.5.1km before joining the River Liffey. The River Liffey then flows in an easterly direction for approximately 5.7km before discharging into Dublin Bay. As above, there is no hydrological connection to this waterbody from the Site.

Under the Water Framework Directive (WFD) 2000/60/EC, the EPA classifies the status and the risk of not achieving good water quality status for all waterbodies in Ireland (EPA, 2022). According to the river waterbody WFD 2013-2018, the water quality within the River Dodder and River Slang is considered to be '*moderate*,' and the status of this river is considered '*at risk*' (EPA, 2022). Its most recent quality data (2019) also indicate that it is '*Slightly polluted*'. The Elm Park Stream belongs to the Brewery_Stream_010 WFD surface waterbody which has a '*Moderate*' Status (EPA, 2022) and its WFD risk score is '*Under Review*'. The section of the Liffey Estuary where the River Dodder joins is currently considered to have '*good*' water quality status, however, the risk to the river is currently under review by the EPA (EPA, 2022).

The location of the key surface water features in the vicinity of the Site are illustrated in Figure 3-1.

Figure 3-1: Watercourses in the Vicinity of the Site



3.3 Proposed Development

Orchid Residential Limited, intend to apply to An Bord Pleanála for permission for a strategic housing development at this site of approximately 0.34 hectares comprising the car sales premises currently known as Vector Motors (formerly known as Victor Motors), Goatstown Road, Dublin 14, D14FD23.

The development will consist of demolition of the existing building (c.960sqm) and hard surface parking area on site and construction of a purpose built student accommodation development (including use as tourist or visitor accommodation outside the academic term) comprising:

- 221 no. student bedspaces (including 10 no. studios), all within a part single storey, part 4 no. storey and part 6 no. storey 'U'-Shaped building;
- The building is single to 4 no. storeys along the southern boundary (with roof terraces at 4th floor level) and part 5 and 6 storeys along Goatstown Road (with setbacks) and boundary to the north (with roof terrace at 5th floor level fronting onto Goatstown Road);
- Amenity space equating to c. 2,025 sqm is provided across the site consisting of c. 1,516 sqm of external amenity in the form of a central courtyard at ground level and roof terraces at 4th and 5th floor levels;
- Internal amenity space equating to c. 509 sqm is provided in the form of 2 no. ground floor lounge/study areas, kitchen/tearoom, laundry, and concierge/office space;
- Provision of 210 no. bicycle parking spaces distributed within the central courtyard (stacked parking with glass roof cover) and adjacent to the front boundary (north);

- Provision for 6 no. carparking spaces comprising 2 no. disabled parking spaces and 4 no. setdown parking spaces adjacent to the front entrance to the site;
- Vehicular access to the site is via Goatstown Road from 2 no. entrance points [reduction from 3 no. entrances currently];
- Ancillary single storey ESB substation and switch room and refuse store are provided at ground level;
- Provision of surface water and underground attenuation and all ancillary site development works including site wide landscaping works, lighting, planting and boundary treatments.

Full details of the Proposed Development are provided as part of the overall Planning Application. Figure 3-2 below shows the Site Boundary of the Proposed Development.

Figure 3-2 Proposed Development Site Boundary



It should be noted that the Proposed Development is not connected to or necessary to, the management of any Natura 2000 sites.

3.3.1 Drainage

In order to comply with the Greater Dublin Drainage Strategy requirements, a separate drainage system will be used for the foul and surface water discharge produced onsite. The Proposed Development will utilise the existing public surface water pipe running along the Goatstown Road to the west of the Site, and the existing sewer running along the western boundary of the Site, falling northwards along Goatstown Road.

3.3.1.1 Surface Water

A mix of surfaces will be used at this Site including green roofs, harvested roofing, permeable paving and soft landscaping to facilitate surface water drainage. Any overflow run-off not intercepted by these surfaces will be discharged to a concrete attenuation tank or lined stormtech system to be subsequently discharged to the existing public surface water pipe to the west of the Site. For further details please refer to the Engineering report that is being submitted as part of the planning package.

3.3.1.2 Foul Water

The foul sewage generated onsite will be discharged via the foul drainage network and discharged to the existing public combined sewer running along the western boundary of the site via a new connection to the public sewers on Goatstown Road.

Details on the Drainage Layout can be found in the Civil Engineer Infrastructure Report.

3.4 Demolition and Construction Procedures

During the demolition and construction phases of the Proposed Development potential environmental effects will be short-term and localised. Nonetheless, all works will comply with the relevant legislation, construction industry guidelines and best practice in order to reduce potential environmental adverse effects.

All potential demolition phase environmental impacts are addressed through a comprehensive Demolition and Construction Waste Management Plan (D&CWMP) in accordance with current best practice guidelines. This plan will require approval from Dún Laoghaire-Rathdown County Council (DLRCC) and relevant statutory bodies prior to the commencement of the proposed works.

The construction works associated with the proposed development will be undertaken in 1 phase. With the development being completed over an 18-month period, between 2023 -2025. Working hours will generally be restricted to between 08:00 and 18:00 hours Monday to Friday inclusive and between 08:00 and 14:00 hours on Saturdays. Construction work will not be permitted on Sundays, public holidays or at night-time except where safety concerns necessitate it or if agreed in advance with the Planning Authority.

4 IDENTIFICATION OF NATURA 2000 SITES

In accordance with the European Commission Methodological Guidance (EC, 2021) a list of European sites that can be potentially affected by the Proposed Development has been compiled. Guidance for Planning Authorities prepared by the Department of Environment Heritage and Local Government (DoEHLG, 2009) states that defining the likely Zone of Influence for the screening and the approach used will depend on the nature, size, location, and the likely effects of the project. The key variables determining whether or not a particular Natura 2000 site is likely to be negatively affected by a project are: the physical distance from the project to the Site; the sensitivities of the ecological receptors; and the potential for in-combination effects. All SPAs and SACs within 15km have been considered to assess their ecological pathways and functional links. As acknowledged in the OPR guidelines (OPR, 2021), few projects have a Zone of Influence this large, however the identification of Natura 2000 sites within 15km has become widely accepted as the starting point for the screening process. For this reason, all SPAs and SACs in 15km have been identified for consideration as part of the screening.

There are sixteen (16 No.) European sites located within 15km of the Site - these are identified in Figure 4-1 and Table 4-1.

Figure 4-1: Natura 2000 sites within 15km of the Site

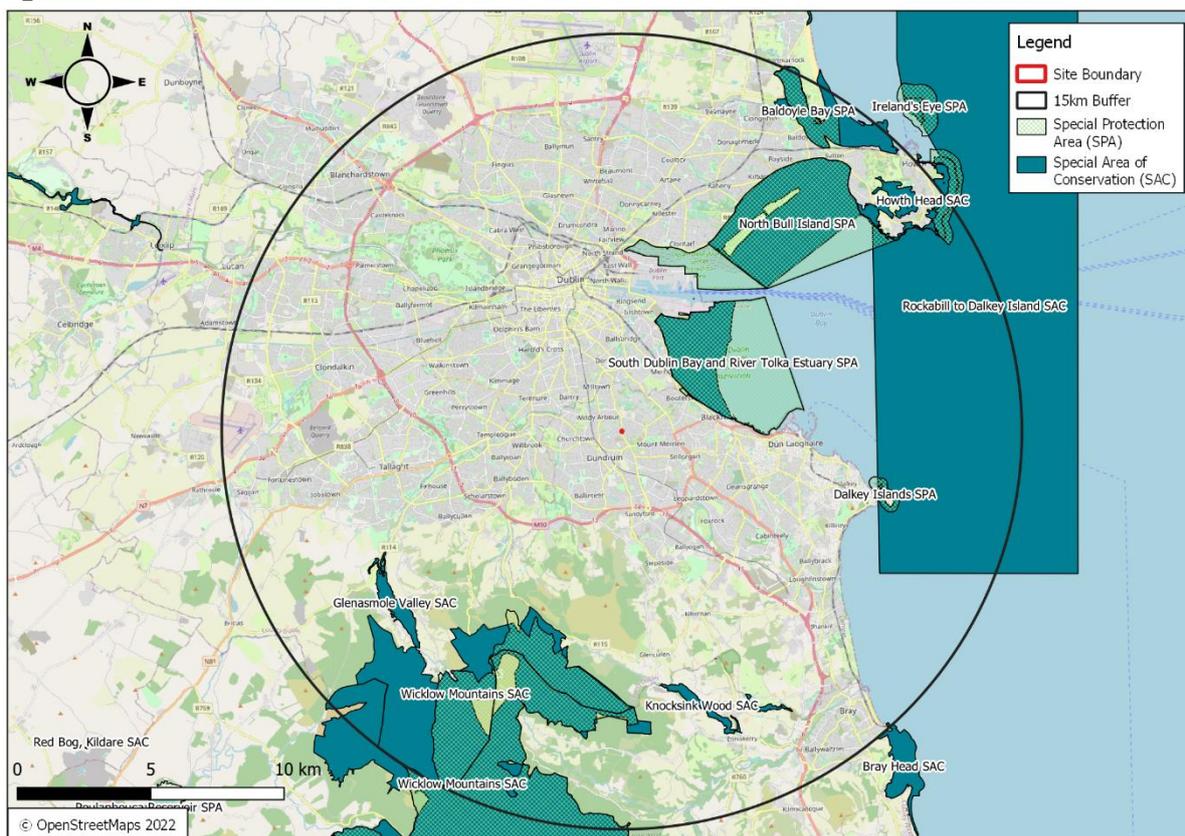


Table 4-1: European Designated Sites within 15km of the Site

Site Name	Code	Distance (km)	Direction from the Site
Special Areas of Conservation (SAC)			
South Dublin Bay	000210	2.8km	NE

Site Name	Code	Distance (km)	Direction from the Site
Wicklow Mountains	002122	7.5km	S
North Dublin Bay	000206	7.7km	NE
Rockabill to Dalkey Island	003000	9.5km	E
Knocksink Wood	000725	9.7km	S
Glenasmole Valley	001209	10km	SW
Ballyman Glen	000713	11km	S
Howth Head	000202	12.4km	NE
Baldoyle Bay	000199	13.1km	NE
Bray Head	000714	14.9km	SE
Special Protection Area (SPA)			
South Dublin Bay and River Tolka Estuary	004024	2.7km	NE
North Bull Island	004006	6.1km	NE
Wicklow Mountains	004040	7.8km	S
Dalkey Island	004172	9.5km	E
Baldoyle Bay	004016	13km	NE
Howth Head Coast	004113	14km	NE

European and national legislation places a collective obligation on Ireland and its citizens to maintain at favourable conservation status areas designated as Special Areas of Conservation, Special Protection Areas and their Qualifying Interests (QIs), and Special Conservation Interests (SCIs). The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites.

5 SCREENING AND ASSESSMENT OF POTENTIAL IMPACTS

Using professional experience, guidance and judgement, the following factors have been taken into account in identifying potential significant impacts on the identified Natura 2000 sites:

- Qualifying Interests;
- Special Conservation Interests;
- Conservation Objectives;
- The nature of the onsite habitats;
- The location of the site; and,
- The scale of the Proposed Development.

Based on these factors, the following two potential significant impacts have been taken forward for further consideration:

- Loss of, or disturbance to, habitats or species during construction phase; and,
- Potential impairment of water quality during the construction and operational phase.

The screening exercise did not identify any other factors that will result in any direct or indirect loss or disturbance to any of the Annex I habitats or Annex I or II species for which the Natura 2000 sites are designated.

5.1 Loss of, or Disturbance to, Habitats or Species During the Construction Phase

The Proposed Development will not result in any direct or indirect loss or disturbance to any of the Annex I habitats or Annex I or II species for which the Natura 2000 sites are designated. This is based on the localised nature of the Proposed Development, and also the distance and intervening lands separating the Site from the nearest Natura 2000 site.

There are no Annex I habitats for which the SACs are designated within or in the vicinity of the Site boundary. Furthermore, given the fact that site is comprised almost entirely of built land (BL3) – the car showroom building and hardstanding areas –the onsite habitats are unsuitable for the species for which the Natura 2000 sites are designated.

The Site is separated from the nearest Natura 2000 site by intervening land and urban development. On the basis of the Source-Pathway -Receptor (SPR) risk assessment principle there is no ecological or functional link between the Proposed Development and any Natura 2000 site in 15km. Therefore, there is no potential for any adverse effects to occur as result of disturbance from the project on the Natura 2000 Sites or any of the qualifying species of interest.

5.2 Potential Impairment of Water Quality During the Construction and Operational Phase

All demolition and construction work associated with the Proposed Development will take place within the existing area of hard standing of the Vector Motors car dealership complex. Furthermore, the development areas will be separated from the Elm Park Stream and River Slang by the existing urban infrastructure including buildings, roads, areas of hardstanding. There will be no direct discharges from the Proposed Development to any watercourse during the demolition or construction phase of the Proposed Development.

During the operational phase, all foul drainage will be directed through new foul water drainage infrastructure which connects into the existing public sewer system.

Overflow run-off will be discharged to a ground-level concrete attenuation tank or lined stormtech system to be subsequently discharged to the existing public surface water pipe going to the WWTP in Ringsend. As stated in the Hydrological & Hydrogeological Qualitative Risk Assessment (as submitted as part of this planning application)

‘The plant has received planning (2019) and will be upgraded with increased treatment capacity over the next five years. The peak foul discharge calculated for the Proposed Development is well within the capacity of the WWTP. Even without treatment at the Ringsend WWTP, the peak effluent discharge, calculated for the Proposed Development as 0.871 litres/sec (which would equate to 0.008% of the licensed discharge at Ringsend WWTP [peak hydraulic capacity]), would not impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status (as defined within the Water Framework Directive).’

As such no adverse effect upon any Natura 2000 site will occur during the construction or operational phase.

The Proposed Development is not located within or directly adjacent to any Natura 2000 sites. Given the nature of the onsite habitats, the location of the Site and the intervening distance, alongside the lack of impact pathways, Baldoyle Bay SAC, Howth Head SAC, North Dublin Bay SAC, Rockabill to Dalkey Island SAC, South Dublin Bay SAC, Glensmole Valley SAC, Wicklow Mountains SAC, Knocksink Wood SAC, Ballyman Glen SAC, Bray Head SAC, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Howth Head Coast SPA, North Bull Island SPA, Dalkey Island SPA and the Wicklow Mountains SPA have been screened out from further consideration.

5.3 Analysis of ‘In-Combination’ Effects

The Habitats Directive requires competent authorities to make an appropriate assessment of any plan or project which is likely to have a significant effect alone or in-combination with other plans and projects.

As described above, the proposed work alone is unlikely to have any direct or indirect adverse effects on any of the Natura 2000 sites located with 15km of the Site.

A review of the Dun Laoghaire-Rathdown Planning (DLRCC, 2022) Search did not identify any current or previous plans or projects in the immediate vicinity that are considered likely to result in significant impacts on Natura 2000 sites. Furthermore, the development is considered unlikely to have any cumulative impact on these Natura 2000 sites in the context of the existing infrastructure and associated activities taking place at the Site.

This statement is supported by:

- I. The distances separating the Site from Natura 2000 sites;
- II. The heavily urban setting of the local environment; and,
- III. The localised nature of the proposed works.

Taking the above into account, it is concluded that there will not be any significant in-combination contribution by the Proposed Development to possible adverse effects on any Natura 2000 sites.

6 SCREENING CONCLUSIONS AND STATEMENT

The screening process has examined the details of the Proposed Development and has considered the potential for causing significant effects on Natura 2000 European sites and their qualifying features of interests within a 15km radius of the Proposed Development.

Sixteen (16No.) designated sites- the Baldoyle Bay SAC, the Howth Head SAC, the North Dublin Bay SAC, the Rockabill to Dalkey Island SAC, the South Dublin Bay SAC, the Glensmole Valley SAC, the Wicklow Mountains SAC, the Knocksink Wood SAC, the Ballyman Glen SAC, the Bray Head SAC, the Baldoyle Bay SPA, the Howth Head Coast SPA, the North Bull Island SPA, the Dalkey Island SPA, the South Dublin Bay and River Tolka Estuary SPA and the Wicklow Mountains SPA - are located within a 15km radius of the Proposed Development. However, given scale and localised nature of the Proposed Development, and the lack of impact pathways between the Site and Natura 2000 sites, as described in Section 4, there is no reasonable scientific doubt that the Proposed Development will result in any significant impacts either directly or indirectly on the conservation objectives or status of the Natura 2000 sites.

In conclusion, activities associated with the Proposed Development either alone, or in combination with other projects or land uses, will not have any direct or indirect significant effects on the conservation objectives of any Natura 2000 European Designated sites.

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