

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

BSM

Est.
1968

**Brady Shipman
Martin**

**Built.
Environment.**

Environmental Assessment **Built Environment**

Client:

Castlethorn Old Connaught UCL

Date:

18 September 2026

DOCUMENT CONTROL SHEET

7245_7245-BSM-XX-XX-RP-EN-0001_S3_P03_Appropriate Assessment Screening Report

Project No. 7245
Client: Castlethorn Old Connaught UCL
Project Name: Old Connaught Phase A1 LRD
Report Name: Appropriate Assessment Screening Report
Document No. 7245-BSM-XX-XX-RP-EN-0001_S3_P03
Issue No. 02
Date: 18/09/2026

This document has been issued and amended as follows:

Issue	Status	Date	Prepared	Checked
01	Draft	14 Jul 2026	SS	MH
02	Final	18 Sep 2026	MH	MH



Contents

1	Introduction	4
1.1	Background	4
1.2	Expertise and Qualifications.....	4
1.3	Legal Requirement for Appropriate Assessment.....	4
2	Methodology.....	5
2.1	Guidelines	5
2.2	Baseline data collection and field visits.....	6
3	Description of the Proposed Development	8
3.1	Site location	8
3.2	Development Description	9
4	Screening for Appropriate Assessment	9
4.1	Background	9
4.2	Potential Zone of Influence	10
4.2.1	European sites	10
4.2.2	Other designated areas (other than European sites)	13
4.2.3	Watercourses and pathways to European sites.....	15
4.3	Study Area and Surrounding Environment.....	15
4.3.1	Site Location and European Sites.....	15
5	Potential impacts from the Proposed Development, including in-combination effects	18
5.1	European sites and habitats with links to European sites	18
5.1.1	Potential impacts during construction	19
5.1.2	Potential impacts during operation.....	20
5.2	Summary of potential impacts of the Proposed Development	35
6	Mitigation specific to European sites	35
7	In-combination effects.....	36
8	Screening conclusion	37
9	References	38
	Appendix I: Background	40
	Stages in the assessment.....	40
	Appendix II Conservation Objectives of European sites.....	42



1 Introduction

1.1 Background

Castlethorn Old Connaught UCL (hereafter referred to as “the Applicant”) proposes the development of lands at Old Connaught, located to the west of the M11 motorway, north of Old Connaught Avenue, within the administrative area of Dún Laoghaire Rathdown County Council. The subject lands form part of the Central Character Area as identified in the Old Connaught Local Area Plan 2025 and comprise predominantly agricultural lands with associated hedgerows, treelines, woodland and local drainage ditches.

Brady Shipman Martin was appointed by the applicant to prepare a report to assist Dún Laoghaire Rathdown County Council in undertaking a screening exercise for Appropriate Assessment (AA). The purpose of the screening exercise is to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with other plans or projects, is likely to have a significant effect on European sites taking into account their conservation objectives.

This document constitutes the Appropriate Assessment Screening Report (“AA Screening Report”) prepared for this purpose.

A comprehensive desk study was undertaken, and multiple site visits have been undertaken at the subject site. The potential impacts on European sites, both as a result of the proposed development and in-combination with other plans and projects, are appraised in this report.

1.2 Expertise and Qualifications

This report has been prepared by Siddharth Sonny, Ecologist and Environmental Consultant at Brady Shipman Martin. He holds a bachelor’s degree in Zoology from the Sacred Heart College, Thevera, India and a master’s degree in Coastal and Marine Environment Science Policy and Practice from National University of Galway. He is an Associate Member of the Chartered Institute of Ecology and Environmental Management and is experienced in drafting and reviewing AA Screening Reports, EIA Screening Reports and SEA Screening Reports. He is also experienced in undertaking ecological surveys and preparing Ecological Impact Assessments Reports (EclA).

A technical review of this document has been completed by Senior Ecologist and Associate, Matthew Hague BSc MSc Adv. Dip. Plan. & Env. Law CEnv MCIEEM of Brady Shipman Martin. Matthew is a highly experienced and qualified ecologist, with a master’s degree in Ecosystem Conservation and Landscape Management. He has over 20 years of experience in ecological and environmental consultancy, across a wide range of sectors. Matthew is a Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Matthew has also completed an Advanced Diploma in Planning and Environmental Law, at King’s Inns and is a member of the Irish Environmental Law Association (IELA).

1.3 Legal Requirement for Appropriate Assessment

European sites make up a network of sites designated for nature conservation under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”) and 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”). The requirements for Appropriate Assessment are set out under Article 6 of the Habitats Directive, transposed into Irish law by the European Union (Birds and Natural Habitats) Regulations 2011 (as amended)¹ (the “Birds and Natural Habitats Regulations”) and the Planning and Development Act, 2000 (as amended) (the “Planning Acts”).

¹ SI No. 477 of 2011

European sites are also known as ‘Natura 2000 Sites’ (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)). As defined in section 177R of the Planning Acts, “European site” means:

- (a) a candidate site of Community importance,
- (b) a site of Community importance,
- (ba) a candidate special area of conservation,
- (c) a special area of conservation,
- (d) a candidate special protection area and
- (e) a special protection area.

Article 6(3) of the Habitats Directive states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have 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 test is to establish whether, in relation to a particular plan or project, appropriate assessment is required. Section 177U of the Planning Acts requires that screening for appropriate assessment must be carried out:

- To assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.
- An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.

The project is not required for the management of any European site, and this AA Screening Report has been prepared in accordance with the requirements of the Birds Directive, the Habitats Directive, the Planning Acts, and the Birds and Natural Habitats Regulations.

2 Methodology

2.1 Guidelines

This report takes the following guidance documents into account:

- Chartered Institute of Ecology and Environmental Management (CIEEM). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, September 2018, updated in September 2019 (V1.1), further updated in April 2022 (V1.2) and again in September 2024 (V1.3).
- Department of Environment, Heritage and Local Government (DoEHLG) (2010a). *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*.
- DoEHLG (2010b). Circular NPW 1/10 & PSSP 2/10: *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities*.
- European Commission (2021). *Assessment of plans and projects in relation to Natura 2000 sites- Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC*.
- European Commission (2018). *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*.
- Directorate – General for Environment (European Commission) (2021). *Guidance document on the strict protection of animal species of Community Interest under the Habitats Directive*.

- National Roads Authority (NRA)² (2009). Guidelines for Assessment of Ecological Impacts of National Road Schemes.
- Office of the Planning Regulator (OPR) (2021). Practice Note PN01 Appropriate Assessment Screening for Development Management.

The report also has regard to the following legislative instruments:

- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”).
- 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”).
- European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).
- Flora (Protection) Order 2022.
- The Wildlife Acts (1976 and 2000, as amended).

2.2 Baseline data collection and field visits

A desk-based assessment was undertaken between October 2025 and September 2026 of the proposed development site and its environs. The assessment focused on habitats and species that are listed as Qualifying Interests (QI) (in the case of SACs) and Special Conservation Interests (SCI) (in the case of SPAs) in the designations for European sites.

An initial site walkover (ecological survey) for the proposed development was undertaken by the author Siddharth Sonny and Ecologist Sadye Goldfarb of Brady Shipman Martin on 17 October 2025. This comprised a habitat survey as well as a survey for rare and/or protected plants, invasive species, mammals and bird survey. In addition, a preliminary bat and large mammal survey (suitability study) was undertaken by specialist bat ecologist Mr Brian Keeley and his team from Wildlife Surveys Ireland (WSI).

Since the initial walkover survey, comprehensive biodiversity surveys have been undertaken as follows:

Winter Bird Surveys (vantage point and transect walks):

- 28 November 2025
- 13 January 2026
- 10 February 2026
- 4 March 2026

Breeding Bird Surveys (vantage point and transect walks):

- 16 April 2026
- 15 May 2026
- 19 June 2026

Habitat and Botanical Survey:

- May 2026 – Hedgerow classification survey undertaken by specialist botanist Mr Alexis Fitzgerald of Fitzgerald Ecology

Bat and Ground Mammal Surveys (Wildlife Surveys Ireland):

Active Bat Transect Surveys:

- 22 October 2025 (evening transect survey)
- 23 October 2025 (dawn re-entry survey)
- 29 October 2025 (evening transect survey)
- 30 October 2025 (dawn re-entry survey)
- 11 May 2026 (evening survey)

- 12 May 2026 (dawn survey)
- 21 May 2026 (evening survey)
- 22 May 2026 (dawn survey)

Static Bat Detector Deployments:

- 22–30 October 2025 (nine nights of continuous monitoring)
- 21 May – 1 June 2026 (twelve nights of continuous monitoring)

Ground mammal field sign surveys were conducted concurrently during all bat survey visits between October 2025 and June 2026 to establish baseline conditions and seasonal activity patterns.

Neither bats nor otters are species listed as Qualifying Interests in any European sites within the Zone of Influence. However, Article 12 of the Habitats Directive requires Member States to take *requisite measures to establish a system of strict protection of animal species listed in Annex IV(a) in their natural range*. Extracts from the EclA are included in this report where relevant. The bat surveys undertaken are consistent with the level of survey recommended in the NPWS document *Bat Mitigation Guidelines for Ireland V2– Irish Wildlife Manuals No. 134 (2022)* and *Bat Mitigation Guidelines for Ireland- Irish Wildlife Manuals No. 25 (2006)*. The surveys focussed on all Irish bat species that are fully protected under the Wildlife Act 1976 and subsequent amendments, and under the EU Habitats Directive, which is transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations, 2011-2015 (as amended). An examination of available information from Bat Conservation Ireland (BCI), previous data from neighbouring sites was also undertaken to compile a list of most likely species in the overall area in addition to the evaluation of the habitat for bats.

Information was collated from the organisations and websites listed below:

- Data on European sites and rare and protected plant and animal species contained in the following databases:
 - The National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage (www.NPWS.ie).
 - The National Biodiversity Data Centre (NDBC) (www.biodiversityireland.ie).
 - BirdWatch Ireland (www.birdwatchireland.ie),
 - Bat Conservation Ireland (www.batconservationireland.org).
- Information on land-use zoning from the online mapping of the Department of the Environment, Community and Local Government (<http://www.myplan.ie/en/index.html>).
- Recent and historical OSi mapping and aerial imagery, including www.geohive.ie.
- Photographs taken at the site.
- Information on local watercourses from www.catchments.ie.
- Information on water quality in the area (www.epa.ie).
- Information on soils, geology and hydrogeology in the area (www.gsi.ie).
- Information on the Status of EU Protected Habitats and Species in Ireland (Article 17 report) (NPWS, August 2025).
- Ireland's 4th National Biodiversity Action Plan 2023–2030 (NPWS, 2023).
- Dún Laoghaire-Rathdown County Development Plan 2022-2028 including the accompanying Appropriate Assessment documentation (Natura Impact Report).
- Old Connaught Local Area Plan 2025, and the accompanying Natura Impact Report.

Given the nature, scale and location of the proposed development site it has been possible to fully assess the ecological value of the site, and the timing of the survey work is fully valid for this planning application.

This report takes full account of the preliminary design of the proposed development, and a detailed examination of all relevant elements of the proposal as it currently stands, was undertaken.

3 Description of the Proposed Development

3.1 Site location

The subject lands (see **Figure 3.1**) are located north of Old Connaught Avenue within the administrative area of Dún Laoghaire Rathdown County Council. The site is bounded by the M11 motorway to the east, Ferndale Road to the west, and Allies River Road to the north.

The lands comprise predominantly agricultural fields in arable use and associated boundary features. Topographically the site rises gradually from east to west.

There is existing residential development occurs adjacent to the site including the Ferndale Court development to the north and Old Connaught House (a Protected Structure) to the west. The Festina Lente lands are located to the southwest of the proposed development site.

Woodland belts, treelines and hedgerows are present along field boundaries and adjoining lands. There are no watercourses as mapped in the EPA database, however there are minor drainage ditches/ streams present along the field boundaries including a ditch referred to as the Old Connaught Tributary in the LAP Document.



Figure 3.1 The location of the proposed development site (refer to the drawings prepared by the project architects for full details)

3.2 Development Description

The proposed development comprises 271no. dwellings in a mix of houses and duplex / apartment units, including 103no. 2 to 3-storey houses (22no. 4-bedroom, 68no. 3-bedroom and 13no. 2-bedroom), 162no. apartments (113no. 2-bedroom and 49no. 1-bedroom) across 4no. blocks ranging from 1-5 storeys in building height and 6no. 3-bedroom duplex units; 1no. creche (c. 574 sqm) at ground floor of Apartment Block 3; and all associated and ancillary site development and infrastructural works including on site attenuation, hard and soft landscaping and boundary treatment works, including: public open space; communal open space; components of the regional attenuation pond; public lighting; surface car parking spaces; bicycle parking spaces/stores for houses and duplex / apartment units; 5no. ESB substations; bin stores; vehicular access via existing Old Connaught Avenue and a proposed new primary north-south street into the eastern portion of the Central Character Area. The proposed development also includes the construction of a new pumping station, associated single storey building, twin rising mains extending circa 400m along Old Connaught Avenue under the M11 connecting to the existing gravity foul network on Old Connaught Avenue 125m east of the M11 bridge and associated storage, together with all ancillary site development and reinstatement works required to facilitate these elements.

4 Screening for Appropriate Assessment

4.1 Background

The first part of the Appropriate Assessment process is the Screening phase. Screening identifies the likely effects of a proposed development on European sites that could arise, either alone or in combination with other plans or projects and considers whether these impacts are likely to have a significant effect on the European site in view of the site's conservation objectives.

In accordance with sections 177U and 177V of the Planning Acts, the AA screening test must be applied to the proposed development, as follows:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site.
- An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

Screening must be undertaken without the inclusion of mitigation, and it is in this context that this AA Screening Report is prepared.

In addition to the foregoing, the Office of the Planning regulator (the OPR) Practice Note “*Appropriate Assessment Screening for Development Management*”, dated March 2021 – also details a number of key concepts relevant to AA Screening, including “Best Scientific Knowledge/Information in the Field” (pg.5), stating:

“The screening determination must be based on scientific information relevant to the likely effects on the conservation objectives of the relevant European sites. The information should be up-to-date and based on the best available techniques and methods to estimate the presence and extent of effects. This is because if there is any scientific uncertainty as to the absence of significant effects, the project must be screened in for appropriate assessment.

In the vast majority of cases the information provided by the applicant (including the project description) and publicly available information in relation to the European sites in question and information published by the NPWS, the EPA and others in relation to such sites, should provide a sufficient level of objective scientific information to allow the planning authority to make an informed decision on screening.”

Following Screening therefore, if there is a possibility of there being a significant effect on a European site, this will generate the need for an appropriate assessment for the purposes of Article 6(3) of the Habitats Directive. This means that if the conclusions at the end of the screening exercise are that significant effects on any European sites, as a result of the proposed development, either alone or in combination with other plans and projects, are likely, uncertain or unknown, then an Appropriate Assessment must be carried out. This is in accordance with established precedent and case law.

4.2 Potential Zone of Influence

This assessment is based on the source-pathway-receptor model, which dictates that, for an effect to occur, there must be a 'source' (such as a construction site); a 'receptor' (such as a designated site for nature conservation); and a 'pathway' between the two (such as a watercourse). A construction site or completed development may also create a barrier to movement, for example, by preventing the migration of fauna along a river corridor, or by obstructing the migration of birds.

Identification of a potential effect means that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the potential effect and the characteristics of the receptor. Although there may be a risk of an impact, it may not necessarily occur, and if it does occur, it may not be significant. In other words, the existence of a source, a pathway and a receptor does not necessarily mean that a significant effect is likely.

There are no set recommended distances for projects to consider European sites as being relevant for assessment. DoEHLG (2010a, pp. 31 – 32) states that:

"The approach to screening is likely to differ somewhat for plans and projects, depending on scale and on the likely effects, but the following should be included:

1. *Any Natura 2000 sites within or adjacent to the plan or project area*
2. *Any Natura 2000 sites within the likely zone of impact of the plan or project. A distance of 15km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et al., 2006). For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects*
3. *Natura 2000 sites that are more than 15km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the cases of sites with water dependent habitats or species, and a plan or project that could affect water quality or quantity, for example, it may be necessary to consider the full extent of the upstream and/or downstream catchment."*

The 2021 OPR guidelines, Practice Note PN01: *Appropriate Assessment Screening for Development Management*, state that the Zone of Influence "*should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km)*" (p. 8).

Therefore, considering the nature, scale and location of the proposed development, and in accordance with the source-pathway-receptor model, the potential Zone of Influence for the proposed development is:

- Any site to which there is a pathway from the subject site during either the construction or operational phase of the development as defined in the following sections. This assessment takes account of all sites within the *potential* Zone of Influence first, regardless of distance.

4.2.1 European sites

While Ballyman Glen SAC is located within the boundary of the wider Old Connaught LAP lands, there are no European Designated Sites (Special Areas of Conservation (SACs), or Special Protection Areas (SPAs)) within or in

the immediate vicinity of the subject site in the Central Character Area. There are a number of such sites in the wider area (see **Figure 4.1**):

■ **Special Areas of Conservation (SAC)**

- Ballyman Glen SAC (site code 000713), c.1.1km to the west.
- Bray Head SAC (site code 000714), c.2.8km to the south east.
- Knocksink Wood SAC (site code 000725), c.2.8km to the west.
- Rockabill to Dalkey Island SAC (site code 003000), c.4.2km to the north east.
- Wicklow Mountains SAC (site code 002122), c.5.9km to the west.
- Glen of the Downs SAC (site code 000719), c.7.3km to the south.
- South Dublin Bay SAC (site code 000210), c.8.9km to the north.
- Carriggower Bog SAC (site code 000716), c.11.4km to the south.
- The Murrough Wetlands SAC (site code 002249), c.11.8km to the south east.
- North Dublin Bay SAC (site code 000206), c.14.3km to the north.
- Glenasmole Valley SAC (site code 001209), c.14.4km to the west.
- Howth Head SAC (site code 000202), c.16.3km to the north east.
- Baldoyle Bay SAC (site code 000199), c.19.5km to the north.

■ **Special Protection Areas (SPA):**

- Wicklow Mountains SPA (site code 004040), c.6.3km to the west.
- Dalkey Islands SPA (site code 004172), c.6.4km to the north east.
- South Dublin Bay and River Tolka Estuary SPA (site code 004024), c.8.8km to the north.
- The Murrough SPA (site code 004186), c.9.7km to the south east.
- North-west Irish Sea SPA (site code 004236), c.14.1km to the north.
- North Bull Island SPA (site code 004006), c.14.3km to the north.
- Howth Head Coast SPA (site code 004113), c.16.6km to the north east.
- Baldoyle Bay SPA (site code 004016), c.19.5km to the north.

Note that the above-listed distances are linear (i.e. 'as the crow flies').

The Conservation Objectives of these sites are to maintain or restore the favourable conservation condition of the QIs / SCIs in question. Where specific conservation objectives have been set out by the NPWS, 'favourable conservation condition' is defined in respect of specific attributes and targets for the habitat or species in question. For further information, refer to **Appendix II**.

Old Connaught Phase A1 LRD
Appropriate Assessment Screening Report

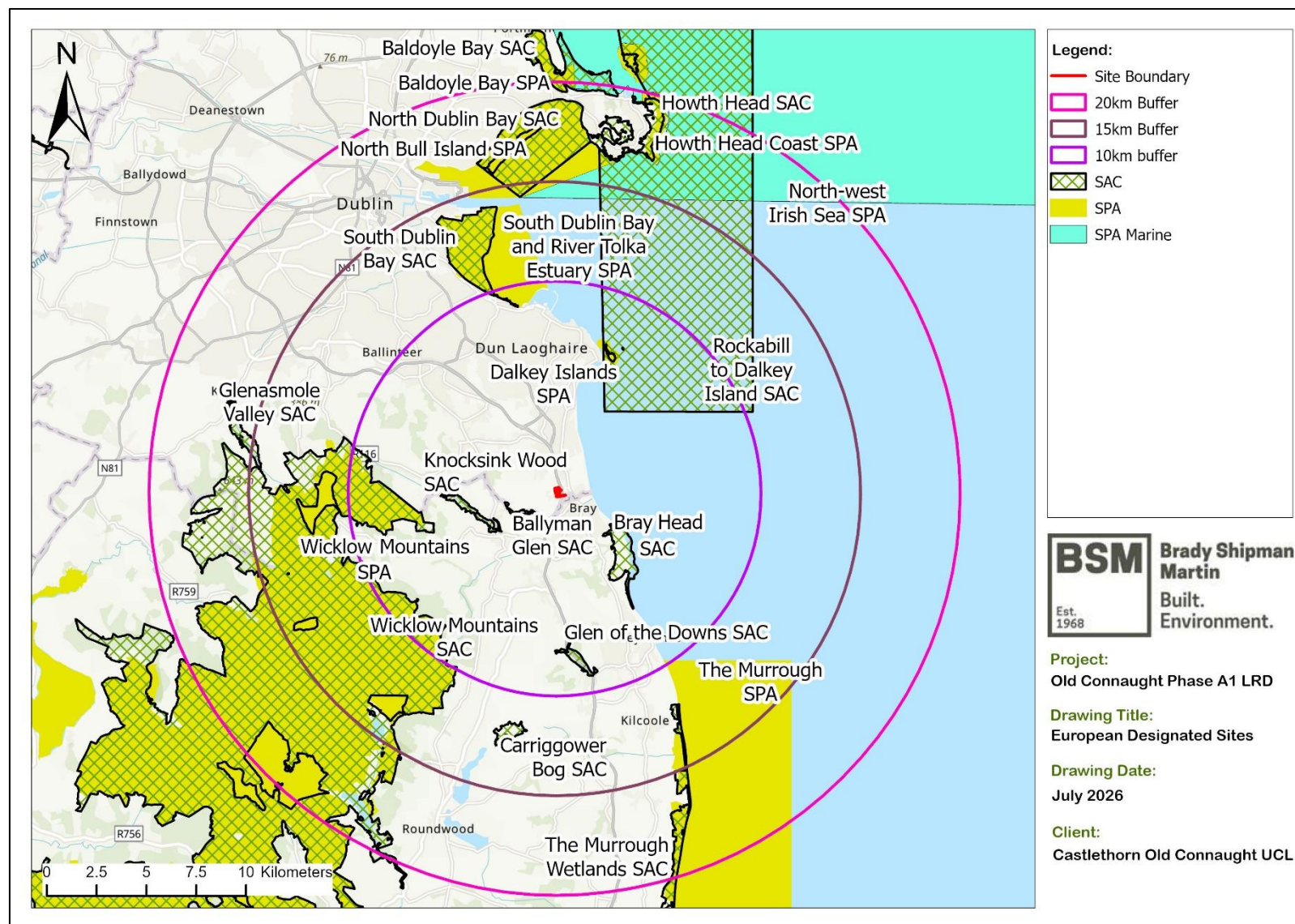


Figure 1.1 European sites within the potential zone of influence of the proposed works. 10, 15 and 20km radii are shown for scale and context.

4.2.2 Other designated areas (other than European sites)

Designated sites other than European sites (i.e. proposed Natural Heritage Areas (pNHAs) and designated Natural Heritage Areas (NHAs)) nearby have been included in this assessment in order to address their potential to act as supporting sites for European sites (see **Figure 4.2**). There are not fully designated NHAs within the Potential Zone of Influence. The pNHAs within the immediate vicinity include:

- **Proposed Natural Heritage Areas (pNHAs):**

- Ballyman Glen pNHA (site code 000713), c.1.1km to the south west.
- Dargle River Valley pNHA (site code 001754), c.2.6km to the south west.
- Bray Head pNHA (site code 000714), c.2.8km to the south east.
- Loughlinstown Woods pNHA (site code 001211), c.2.8km to the north.
- Knocksink Wood pNHA (site code 00725), c.2.8km to the west.
- Powerscourt Woodland pNHA (site code 001768), c.3.3km to the south west.
- Dalkey Coastal Zone and Killiney Hill pNHA (site code 001206), c.3.4km to the north east.
- Dingle Glen pNHA (site code 001207), c.3.8km to the north.
- Great Sugar Loaf pNHA (site code 001769), c.3.9km to the south.
- Ballybetagh Bog pNHA (site code 0012020), c.4.1km to the west.
- Kilmacanoge Marsh pNHA (site code 000724), c.4.7km to the south.
- Glencree Valley pNHA (site code 001755), c.6.3km to the west.
- Powerscourt Waterfall pNHA (site code 001767), c.7.3km to the south west.
- Glen of the Downs pNHA (site code 000719), c.7.4km to the south.
- Fitzsimon's wood pNHA (site code 001753), c.8.7km to the north west.
- South Dublin Bay pNHA (site code 000210), c.8.8km to the north.

Note that above distances are as crow flies (i.e. linear distances). No impacts are expected on any pNHA in the zone of influence.

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

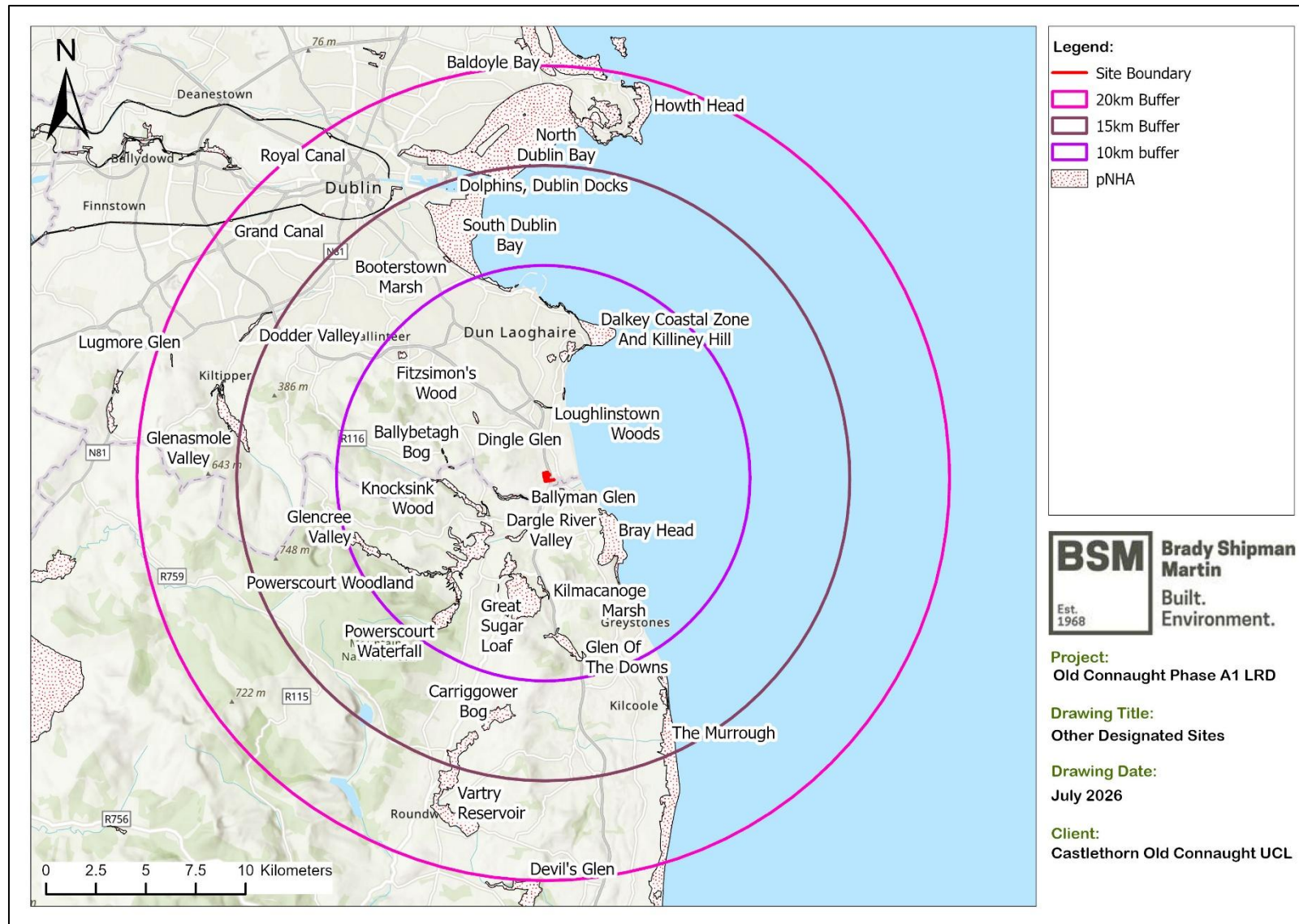


Figure 2.2 pNHA sites within the potential zone of influence of the proposed works. 10, 15 and 20km radii are shown for scale and context.

4.2.3 Watercourses and pathways to European sites

A review of the Environmental Protection Agency (EPA) web-tool indicates that there are no mapped surface water features present on the site. The nearest EPA-mapped surface water feature is the Rathmichael (Crinken) Stream (IE_EA_10D010300), (see **Figure 4.3**) located approximately 350m east of the site.

There are minor drainage ditches associated with the field boundaries at the site, including a section of a minor stream known as the Old Connaught Tributary as referenced in the Old Connaught Local Area Plan documentation (specifically the Strategic Flood Risk Assessment), which, as mapped, appears to flow along the ditches in the south eastern part of the site. Together with a network of field drains and a culverted connection at the site boundary. It forms part of the local drainage network linking on-site surface water to the wider Shanganagh / Ovoca-Vartry drainage system.

There are no European designated coastal or estuarine sites within the site boundary and the local drainage network discharges ultimately to the Irish Sea via the broader Ovoca-Vartry river system. No local watercourses drain directly into any European sites – Bray Head SAC is approximately 2km to the south and Rockabill to Dalkey Island SAC is approximately 4km to the north of the outfall to the sea.

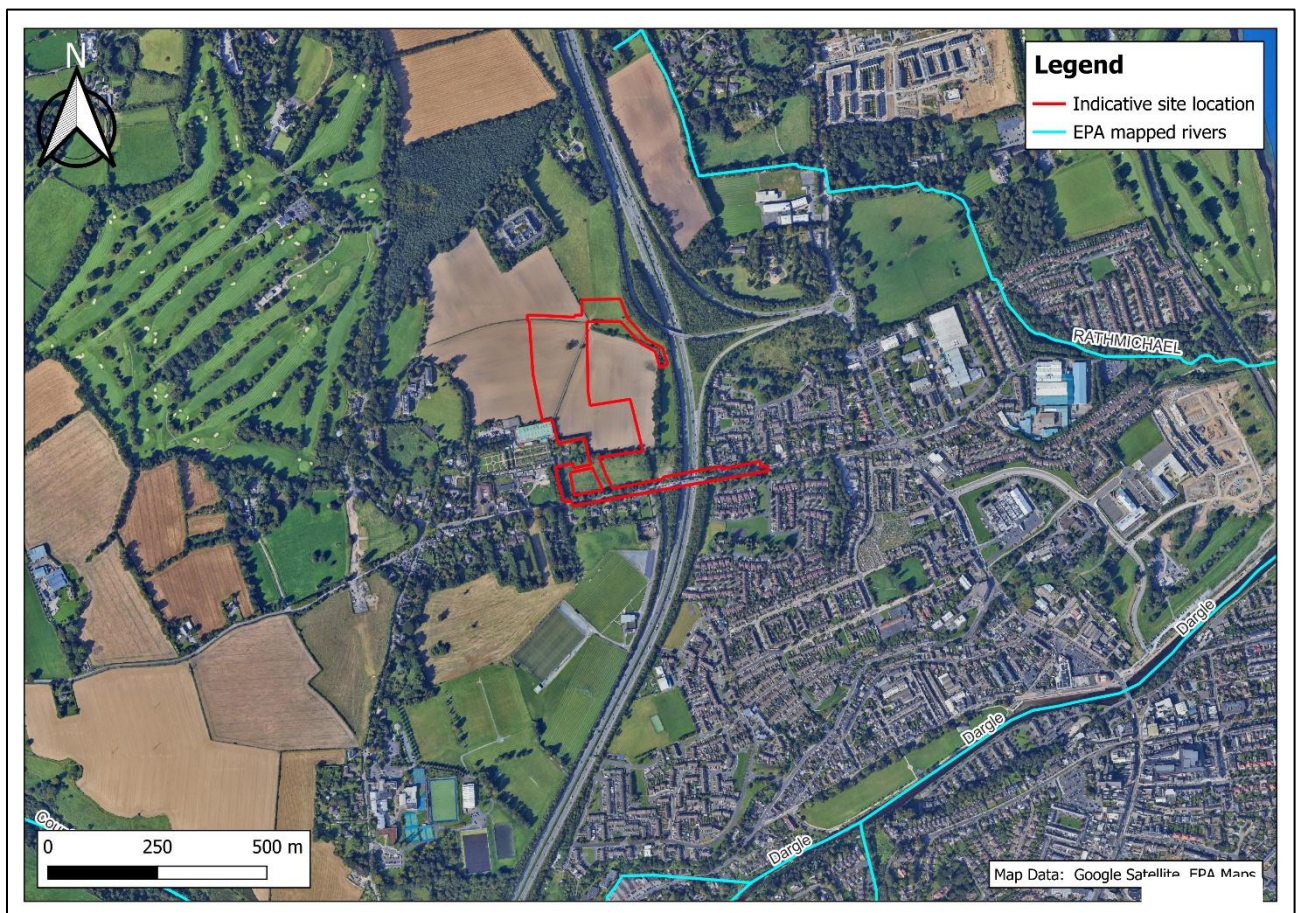


Figure 4.3. Waterbodies mapped by the EPA in the vicinity of the proposed development and described in the EPA database.

4.3 Study Area and Surrounding Environment

4.3.1 Site Location and European Sites

The proposed development lands at Old Connaught comprise part of a large field in agricultural (arable) use, as well as a smaller unmanaged field, located north of Old Connaught Avenue and surrounded by mature trees. The overall

site is bounded by the M11 motorway to the east, Ferndale Road to the west and Old Connaught Avenue to the south. The lands form part of the Central Character Area identified in the Old Connaught Local Area Plan 2025.

The site supports a mosaic of agricultural and semi-natural habitats. The dominant habitat types are improved agricultural grassland (GA1 – the smaller field adjacent to Old Connaught Avenue) and arable crops (BC1 – the majority of the site), both of low botanical diversity and typical of intensively managed farmland. Fields (as opposed to the subject site itself) are delineated by hedgerows (WL1 – the eastern and northern sides) and treelines (WL2 – around the southern field), which form the principal ecological corridors across the wider lands.

Drainage ditches (FW4), including a ditch/stream referred to in LAP documentation as the Old Connaught Tributary, are present. Woodland habitats in the wider area (outside the development boundary red line) include a small area of mixed broadleaved/conifer woodland (WD2) along the northern field boundary associated with off-site woodland at Ferndale Court, together with strips of mixed broadleaved woodland (WD1) along parts of the western and eastern field boundaries. A discrete scrub area (WS1) occurs in the south-eastern section of the site.

The improved grasslands and arable fields are species-poor and dominated by perennial ryegrass (*Lolium perenne*) with occasional common herbs such as ribwort plantain (*Plantago lanceolata*), creeping buttercup (*Ranunculus repens*) and dandelion (*Taraxacum* sp.). A localised area of dry meadow and grassy verge (GS2) occurs in the southern portion of the site and exhibits moderate structural variation but has no affinity to Annex I grassland habitat under the EU Habitats Directive.

The site is not subject to any statutory ecological designation. It does not form part of, nor is it directly connected to, any Special Area of Conservation (SAC) or Special Protection Area (SPA). None of the habitats recorded on site correspond to Qualifying Interests (QIs) or Special Conservation Interests (SCIs) of any European site.

A detailed hedgerow survey was undertaken in May 2026 by FitzGerald Ecology in accordance with the Hedgerow Appraisal System (after Foulkes *et al.* 2013 and Kelleher Ecology Services 2021). Eight hedgerow features were assessed on the wider lands, comprising a mix of Hedgerows (WL1) and Treelines (WL2) that delineate field boundaries across the site. Of these eight features:

- Three Hedgerows were identified as Heritage Hedgerows based on their species diversity, structural features, and habitat connectivity value.
- Of the three one is considered to be of County Importance given its impressive species diversity (including native indicators such as wood avens (*Geum urbanum*), herb Robert (*Geranium robertianum*), ramsons (*Allium ursinum*), and bush vetch (*Vicia sepium*), historical continuity (appearing on first edition Ordnance Survey maps), and role in landscape-scale habitat connectivity.

The treelines on-site are very species-rich, with at least 49 woody species recorded across the site and a high diversity of semi-natural woodland indicators. The canopy is dominated by *Acer pseudoplatanus* (sycamore) and *Fraxinus excelsior* (ash), with other species including *Quercus robur* (pedunculate oak), *Crataegus monogyna* (hawthorn), *Prunus spinosa* (blackthorn), and *Ilex aquifolium* (holly). While these linear features provide valuable local ecological connectivity and are of Local to County Importance for habitat connectivity and landscape structure, they do not constitute, contain, or support habitat types that correspond to the Qualifying Interests (QIs) or Special Conservation Interests (SCIs) of any European site.

Specifically, the hedgerows and treelines do not support the Annex I woodland habitats (such as [91A0] Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles, or [91E0] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* for which nearby SACs (Ballyman Glen SAC 1.1km to the west, Knocksink Wood SAC 2.8km to the west) are designated. The hedgerows are not associated with alkaline fen, petrifying springs, or other water-dependent habitats for which these SACs are also designated. There are no groundwater-dependent ecosystems of any kind on the subject site and no pathways or links of any kind to groundwater-dependent habitats associated with any European site.

Therefore, none of the habitats recorded on site, including the hedgerows and treelines, correspond to Qualifying Interests (QIs) or Special Conservation Interests (SCIs) of any European site.

Several non-native invasive plant species were recorded during ecological surveys of the site in 2025-2026. The detailed hedgerow survey (May 2026) and habitat survey confirmed the following:

- *Allium triquetrum* (Three-cornered garlic): This species is listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477/2011) as a species subject to strict control measures. It was recorded in scattered locations below mature treelines on-site within the proposed development boundary. While this is a highly invasive woodland ground flora plant, its presence on-site does not create any pathway to European sites, as explained in **Section 5** below.
- *Buddleja davidii* (Butterfly bush), Japanese knotweed (*Reynoutria japonica*), and winter heliotrope (*Petasites fragrans*) were all recorded outside the red line application boundary of the proposed development. These species occur along field boundaries and the northern boundary of the site and will not be affected by the proposed development.

As the invasive species management activities will be confined to within the application boundary and will not affect European sites, there is no possibility that the proposed development will result in any significant effects on European sites as a result of invasive species management or disturbance, as outlined in Section 5.1.2 below.

5 Potential impacts from the Proposed Development, including in-combination effects

5.1 European sites and habitats with links to European sites

The subject lands at Old Connaught are not located within any designated site for nature conservation, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Natural Heritage Areas (NHAs)/proposed Natural Heritage Areas (pNHA).

No Annex I habitats as defined under Article 4 of the Habitats Directive are present within the site, including groundwater-dependent habitats. As identified through detailed hedgerow survey (May 2026), the site does support habitats of Local to County ecological importance, specifically three Heritage Hedgerows and one hedgerow of County Importance. These features provide valuable habitat connectivity but do not correspond to any Annex I habitat types.

No plant species listed under the **Flora (Protection) Order 2022** were recorded during the habitat surveys. Purple ramping-fumitory (*Fumaria purpurea*) was recorded as a ruderal species at the edge of an arable field on-site; however, this species is no longer considered locally rare in Co. Dublin and is likely introduced. The botanical assemblage is characteristic of improved and semi-improved farmland and disturbed soils, entirely composed of common, widespread species typical of agricultural land use.

The hedgerows, while of significant local ecological value for landscape connectivity and supporting diverse native woody species, do not represent the Annex I woodland habitats (such as [91A0] Old sessile oak woods or [91E0] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*, or [7220] Petrifying springs with tufa formation (Cratoneurion) designated at nearby SACs. No reservoir habitats capable of supporting species of conservation concern associated with European sites were recorded.

Ornithological surveys undertaken during winter 2025/2026 (23 species recorded) and breeding season 2026 (27 species recorded) confirmed that the improved grassland fields on-site do not provide suitable breeding, roosting or wintering habitat for SCI species. While black-headed gull and curlew (both SCI species in Dublin Bay SPAs) were recorded during initial site walkover, subsequent detailed systematic surveys (Winter bird & Breeding bird surveys) recorded these species at negligible abundance with no evidence of site dependency. Curlew feeding was observed during the initial visit but has not been recorded during any subsequent survey visits, indicating no regular or reliant use of the site. Black-headed gulls were occasionally observed feeding on-site during winter bird surveys (2025/2026); however, during the breeding season surveys (2026) they were predominantly recorded flying over the site, with very occasional resting records occurring outside the red line boundary, indicating transient passage use rather than reliance on on-site habitat. These isolated incidental records of gulls and curlew represent transient passage use only, not functional habitat utilization. The site lacks the essential habitat features (tidal mudflats, permanent water bodies, open feeding areas with regular food sources) required for SCI species to establish reliant populations. The improved grassland supports only common, widespread farmland birds with no conservation designations. Accordingly, there is no functional ecological linkage between bird populations utilising the subject lands and any European site designated for wintering, breeding, or passage birds.

In accordance with the NRA/TII Guidelines for Assessment of Ecological Impacts of National Road Schemes (2009), the site within the application boundary, while noting the presence of the hedgerows and tree lines, is assessed as being of **Local Importance (Lower Value)**. The habitats present on-site are of limited ecological value and support only common, widespread species. The most significant ecological features in the wider area - specifically the hedgerows (WL1) and treelines (WL2) classified as Heritage Hedgerows and County Importance - are located outside the red line boundary and will not be directly impacted by the proposed development. Therefore, the site itself does not represent a receptor of ecological significance for European site conservation interests.

5.1.1 Potential impacts during construction

The proposed development comprises a large-scale residential scheme within the Old Connaught LAP lands. The site is characterised by a mosaic of arable fields, unmanaged grassland, hedgerows, tree lines and drainage ditches, with localised areas of disturbed ground and scrub. As outlined in **Section 5.1** above, the area within the red line boundary is of **Local Importance (Lower Value)**, as majority of the site comprises low-diversity, improved farmland.

As with any construction project, site clearance, earthworks and construction activities have the potential to generate contaminants such as suspended solids, hydrocarbons and cementitious materials. The on-site hydrological features include slow-flowing drainage ditches and the Old Connaught Stream (also known as the Ballyman Tributary), which flows through the site. Polluted surface water will not be emitted directly to any surface water body. There is a possibility that contaminated surface water from the site could enter the local ditches/surface water network, thereby creating an indirect hydrological pathway linking the proposed development site with the sea.

The proposed development also includes construction of a strategic foul pumping station and associated twin rising mains to convey wastewater to the existing foul network on Old Connaught Avenue, as outlined in the AtkinsRéalis Foul Pumping Station and Rising Main Report. This infrastructure construction will generate temporary ground disturbance and construction activity comparable to standard site works. As with all construction activities, appropriate mitigation measures will be implemented through the Construction Environmental Management Plan (CEMP), including sediment management, spill containment protocols, and ecological protection measures. The pumping station is located on-site in the south-west of the development, with rising mains conveying effluent northward beneath the N11 and along Old Connaught Avenue to discharge into the existing foul network. Given the nature of foul water infrastructure (conveying treated wastewater via enclosed pipe systems), the temporary construction disturbance associated with trenching and pipe-laying does not create any meaningful hydrological linkage to European sites, particularly given the established foul treatment infrastructure and the distances to coastal European sites (Bray Head SAC approximately 3km south; Dalkey Island SAC approximately 4km north of the final discharge point to the marine environment).

However, as documented in the Storm Water Impact Assessment Report (AtkinsRéalis, 2026), the Old Connaught Stream enters a culvert at Ferndale Road and subsequently flows through a series of culverts and open channels in an easterly direction before discharging to the Crinken Stream on the eastern side of the M11 motorway, which in turn discharges to the Irish Sea. It does not drain directly into any European sites – Bray Head SAC is approximately 2km to the south and Rockabill to Dalkey Island SAC is approximately 4km to the north of the discharge point. Even in the event of such an emission, considering the high dilution factor and the potential receiving watercourses, and the distances to the nearest European Sites, it is not remotely likely that perceptible ecological effects could arise in this way.

There are no European sites with groundwater-dependent qualifying interests within the zone of influence of the proposed development and there is no possibility of significant effects on any European site via spillages to ground or via changes to groundwater.

Accordingly, there is no direct land-take from any European site, and the proposed works will not result in fragmentation, loss or deterioration of habitats of conservation value either within or outside designated sites as a result of construction-related activities. No *ex-situ* populations of European site species occur within the development footprint. The baseline breeding bird surveys undertaken at the site did not identify any nationally or internationally protected bird species utilising the site as a breeding habitat, population refuge, or core foraging area. Accordingly, no disturbance, barrier effects, loss of habitat connectivity, or alterations to ecological processes relevant to any European site will arise.

Similarly, there will be no emissions to air from construction vehicles that could remotely impact any European site. Dust, noise and vibration arising during construction will be entirely remote from any European site.

On this basis, no direct, indirect or secondary impacts on any European site can arise as a result of construction works at the Old Connaught site.

The likelihood of significant effects arising as a result of the proposed construction works, on European sites (or on proposed Natural Heritage Areas), can therefore be excluded.

5.1.2 Potential impacts during operation

During the operational phase, typical environmental aspects and effects associated with the presence and operation of a residential development are also predicted, including potable water consumption, foul water loading to the municipal network, and direct and indirect greenhouse gas emissions. Operational phase effects are expected to be permanent in duration. The site is zoned for the type of development proposed.

Surface water management at Old Connaught will be governed by the requirements of the Old Connaught Local Area Plan 2025, which mandates the integration of Sustainable Urban Drainage Systems (SuDS) throughout new development areas. In accordance with LAP policy, the proposed development will be required to incorporate SuDS measures such as swales, permeable paving, green roofs where appropriate, detention/attenuation features, and landscaped conveyance routes to ensure that surface water runoff rates do not exceed greenfield rates and that water quality is protected prior to discharge to the receiving drainage network.

The LAP identifies that surface water within the plan area ultimately discharges to the sea via a network of existing and proposed surface water drains and local ditches. No European sites are located within or immediately downstream of the receiving water catchment.

Even in the total absence of any SuDS measures there would be no impacts on any European sites. The significant distances to European sites and the natural characteristics of the receiving waters ensure rapid mixing of water such that there is no possibility of any appreciable effect on water quality in European sites in any event.

A Flood Risk Assessment report has been undertaken to satisfy the requirements of the Planning System and Flood Risk Management Guidelines. Refer to the AtkinsRéalis Flood Risk Assessment Report (0126446DG0010) for the proposed development, which confirms that the construction and operation of the proposed development will not increase flood risk either on-site or elsewhere, nor will it alter flood risk in any location linked to a European site.

With respect to foul water, the Old Connaught Local Area Plan 2025 identifies that wastewater from the Old Connaught area will be conveyed via a strategic foul pumping station to the Shanganagh–Bray Wastewater Treatment Plant (WWTP), which is licensed by the Environmental Protection Agency and operates within the limits set by its discharge licence.

As set out in the Foul Pumping Station and Rising main report, prepared by AtkinsRéalis and submitted separately, *the proposed foul pumping station solution comprises a gravity foul drainage network discharging to a new wastewater pumping station, with flows transferred via twin rising mains under the N11 and discharging to the existing public foul network along Old Conna Avenue. The existing foul network discharges to the existing Bray Pump Station and onward to the Shanganagh Wastewater Treatment Plant. The existing foul gravity network on Old Conna Avenue and via the Bray Sea Gardens Development was recently upgraded by Uisce Éireann (UE) as part of the Local Network Reinforcement Project and has the capacity to cater for the flows from the Old Connaught LAP catchment. It is noted that the LAP also confirms that the Shanganagh Wastewater Treatment Plant has available treatment capacity to accommodate future development.*

Further detail and justification are also provided in the Foul Pumping Station and Rising Main report prepared by AtkinsRéalis and submitted separately.

Given the distance between the subject lands and the coastal receiving environment, the treatment capacity of the WWTP, and the level of dilution and dispersion in the marine environment, there is no potential for the operational foul discharge associated with the development to result in any significant effect on any European site.

There is no potential for any other operational impact, direct, indirect, or secondary, to affect any European site. There will be no loss, fragmentation, degradation, disturbance or alteration of any component of any European site, and no effect on any *ex-situ* population of species for which European sites are designated.

The likelihood of significant effects arising as a result of the operation of the proposed development, on European sites (or on proposed Natural Heritage Areas), can therefore be excluded.

A detailed discussion of the potential impacts of the proposed development on individual European sites within the potential Zone of Influence is presented in **Table 5.1**, below.

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Table 5.1 - Potential Impacts on European sites in the Potential Zone of Influence

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Ballyman Glen SAC (site code 000713), c.1.1km to the west	[7220] Petrifying springs with tufa formation (<i>Cratoneurion</i>)* [7230] Alkaline fens According to this SAC's site Conservation Objectives document (Version 1, dated 17 July 2019), for the listed QI, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat for which the SAC has been selected.	The qualifying interests of this site are sensitive to changes to water quality and changes to water table levels. However, there is no hydrological link or any other pathway between the proposed development site and this SAC. It is over 1km distant and is completely unconnected. There are no groundwater-dependent ecosystems at the subject site, and no hydrological/hydrogeological pathway to this SAC. Furthermore, there will be no loss of habitat, no species fragmentation, and no disturbance to the qualifying interests of this SAC as a result of the proposed development.	No
Bray Head SAC (site code 000714), c.2.8km to the south east	[1230] Vegetated Sea cliffs of the Atlantic and Baltic coasts [4030] European dry heath According to this SAC's site Conservation Objectives document (Version 1, dated 11 April 2017), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	No significant effects on water quality, and therefore on the site's QIs (sea cliffs and dry heaths), are predicted. Surface/ground water arising during the site clearance and construction works at the proposed development site in Old Connaught could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground and surface water drainage network and from there, eventually, via the Rathmichael (Cringen) Stream, to the sea. However, there will be only low amounts of sediments displaced as a result of the proposed works that may leave the immediate working area. No changes in the water quality of the neighbouring waters or downstream are expected as a result. Dust, noise and vibration arising during site clearance and construction will similarly be remote from this or any European site. Given the nature, size and location of the proposed development, as described in section 5.1.1 and 5.1.2, there would be no significant effects on the conservation objectives of the European site. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site at Old Connaught, any pollution from the proposed site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the SAC any pollutants would be even further diluted and dissipated by the receiving	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		waters. It would not be perceptible at Bray Head SAC, due to the very small volumes. Construction-related impacts as a result of the proposed development, on this European site or otherwise, can therefore be excluded. There is, further, no possibility of any other effects from the proposed development site on the QIs of the SAC. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development. There will be no operational impacts on this European site as a result of the proposed development.	
Knocksink Wood SAC (site code 000725), c.2.8km to the west	■ [7220] Petrifying springs with tufa formation (<i>Cratoneurion</i>)* ■ [91A0] Old sessile oak woods with Ilex and Blechnum in the British Isles ■ [91E0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)* According to this SAC's site Conservation Objectives document (Version 1, dated 13 December 2021), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	The qualifying interests of this site are sensitive to changes to water quality and changes to water table levels. However, there is no hydrological link or any other pathway between the proposed development site and this SAC. It is almost 3km distant and is completely unconnected. There are no groundwater-dependent ecosystems at the subject site, and no hydrological/hydrogeological pathway to this SAC. Furthermore, there will be no loss of habitat, no species fragmentation, and no disturbance to the qualifying interests of this SAC as a result of the proposed development.	No
Rockabill to Dalkey Island SAC (site code 003000), c.4.2km to the north east	■ [1170] Reefs ■ [1351] Harbour porpoise <i>Phocoena phocoena</i> According to this SAC's site Conservation Objectives document (Version 1, dated 07 May 2013), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	Disturbance to harbour porpoise is not considered to be remotely likely as a result of the proposed development, which is inland and separated by over 4km of open sea from the European site. Furthermore, no significant effects on water quality and therefore on the site's QIs (reefs and harbour porpoise) are predicted. Surface/ground water arising during the site clearance and construction works at the proposed development site in Old Connaught could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground and surface water drainage network and from there, eventually, via the Rathmichael (Crinken) Stream, to the sea.	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		However, there will be only low amounts of sediments displaced as a result of the proposed works that may leave the immediate working area. No changes in the water quality of the neighbouring waters or downstream are expected as a result. Dust, noise and vibration arising during the site clearance and construction will similarly be remote from this or any European site. Given the nature, size and location of the proposed development, as described in section 5.1.1 and 5.1.2, there would be no significant effects on the conservation objectives of the European site. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ ground water quality in the proposed development site at Old Connaught, any pollution from the proposed site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the SAC any pollutants would be even further diluted and dissipated by the receiving waters. It would not be perceptible at Rockabill to Dalkey Island SAC, due to the very small volumes. Construction-related impacts as a result of the proposed development, on this European site or otherwise can therefore be excluded. There is, further, no possibility of any other effects from the proposed development site on the QIs of the SAC. There will be no loss of habitat or species, and no fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development. There will be no operational impacts on this European site as a result of the proposed development.	
Wicklow Mountains SAC (site code 002122), c.5.9km to the west	■ [1355] Otter <i>Lutra lutra</i> ■ [3110] Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) ■ [3130] Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> ■ [3160] Natural dystrophic lakes and ponds ■ [4010] Northern Atlantic wet heaths with <i>Erica teralix</i> ■ [4030] European dry heaths	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is around 6km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	■ [4060] Alpine and Boreal heaths ■ [6130] Calaminarian grasslands of the <i>Violetalia calaminariae</i> ■ [6230] Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) ■ [7130] Blanket bogs (* if active bog) ■ [8110] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) ■ [8210] Calcareous rocky slopes with chasmophytic vegetation ■ [8220] Siliceous rocky slopes with chasmophytic vegetation ■ [91A0] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles According to this SAC's site Conservation Objectives document (Version 1, dated 31 July 2017), for each of the listed QIs, the Conservation Objective is to maintain or to restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.		
Glen of the Downs SAC (site code 000719), c.7.3km to the south;	■ [91A0] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles According to this SAC's site Conservation Objectives document (Version 1, dated 10 December 2020), for each of the listed QIs, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is over 7km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No
South Dublin Bay SAC (site code 000210), c.8.9km to the north	■ [1140] Mudflats and sandflats not covered by seawater at low tide ■ [1210] Annual vegetation of drift lines	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is around 9km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation,	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	[1310] <i>Salicornia</i> and other annuals colonising mud and sand [2110] Embryonic shifting dunes According to this SAC's site Conservation Objectives document (Version 2, dated 24 April 2026), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitats for which the SAC has been selected.	or disturbance to the qualifying interests of this SAC as a result of the proposed development.	
Carriggower Bog SAC (site code 000716), c.11.4km to the south	[7140] Transition mires and quaking bogs According to this SAC's site Conservation Objectives document (Version 1, dated 13 December 2019), for each of the listed QIs, the Conservation Objectives are to maintain the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is over 11km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No
The Murrough Wetlands SAC (site code 002249), c.11.8km to the south east	[1210] Annual vegetation of drift lines [1220] Perennial vegetation of stony banks [1330] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1410] Mediterranean salt meadows (<i>Juncetalia maritima</i>) [7210] Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>* [7230] Alkaline fens According to this SAC's site Conservation Objectives document (Version 1, dated 22 December 2021), for each of the listed QIs, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	No significant effects on water quality, and therefore on the site's QIs, are predicted. Surface/ground water arising during the site clearance and construction works at the proposed development site in Old Connaught could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground and surface water drainage network and from there, eventually, via the Rathmichael (Crinken) Stream, to the sea. However, there will be only low amounts of sediments displaced as a result of the proposed works that may leave the immediate working area. No changes in the water quality of the neighbouring waters or downstream are expected as a result. Dust, noise and vibration arising during site clearance and construction will similarly be remote from this or any European site. Given the nature, size and location of the proposed development, as described in section 5.1.1 and 5.1.2, there would be no significant effects on the conservation objectives of the European site. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		development site at Old Connaught, any pollution from the proposed site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the SAC any pollutants would be even further diluted and dissipated by the receiving waters. It would not be perceptible at Bray Head SAC, due to the very small volumes. Construction-related impacts as a result of the proposed development, on this European site or otherwise, can therefore be excluded. There is, further, no possibility of any other effects from the proposed development site on the QIs of the SAC. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development. There will be no operational impacts on this European site as a result of the proposed development.	
North Dublin Bay SAC (site code 000206), c. 14.3km to the north	■ [1140] Mudflats and sandflats not covered by seawater at low tide ■ [1210] Annual vegetation of drift lines ■ [1310] <i>Salicornia</i> and other annuals colonising mud and sand ■ [1330] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) ■ [1395] Petalwort <i>Petalophyllum ralfsii</i> ■ [1410] Mediterranean salt meadows (<i>Juncetalia maritima</i>) ■ [2110] Embryonic shifting dunes ■ [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes)* ■ [2190] Humid dune slacks According to this SAC's site Conservation Objectives document (Version 1, dated 06 November 2013), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s)	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is over 14km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No



Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	and/or the Annex II species for which the SAC has been selected.		
Glenasmole Valley SAC (site code 001209), c. 14.4km to the west	[6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid site) [6410] <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [7220] Petrifying springs with tufa formation (Cratoneurion)* According to this SAC's site Conservation Objectives document (Version 1, dated 10 December 2021), for each of the listed QIs, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is over 14km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No
Howth Head SAC (site code 000202), c. 16.3km to the north east	[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts [4030] European dry heaths According to this SAC's site Conservation Objectives document (Version 1, dated 06 December 2016), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is over 16km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No
Baldoyle Bay SAC (site codes 000199), c. 19.5km to the north	[1140] Mudflats and sandflats not covered by seawater at low tide [1310] Salicornia and other annuals colonising mud and sand [1330] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1410] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) According to this SAC's site Conservation Objectives document (Version 1, dated 19 November 2012), for each of the listed QIs,	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SAC. The distance is over 19km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SAC as a result of the proposed development.	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.		
Wicklow Mountains SPA (site code 004040), c.6.3km to the west	[A098] Merlin <i>Falco columbarius</i> [A103] Peregrine <i>Falco peregrinus</i> According to this SPA's site Conservation Objectives document (Version 1, dated 16 July 2024), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species for which the SPA has been selected.	The species (bird of prey) from which the SPA is designated are potentially sensitive to direct disturbance due to noise and anthropogenic activity. However, such disturbance is not considered to be remotely likely as a result of the proposed development, which is over 6km distant from the European site and not connected to it in any way. There is no hydrological link or any other pathway between the proposed development site at the site in Woodbrook and this SPA. Furthermore, there will be no loss of species, fragmentation, or disturbance to the special conservation interests of this site as a result of the proposed development.	No
Dalkey Islands SPA (site code 004172), c. 6.4km to the north east	[A192] Roseate Tern <i>Sterna dougalii</i> [A193] Common Tern <i>Sterna hirudo</i> [A194] Arctic Tern <i>Sterna paradisaea</i> According to this SPA's site Conservation Objectives document (Version 1 - dated 12 October 2022), for each of the listed SCIs, the Conservation Objective is to restore the favourable conservation condition of the species for which the SPA has been selected.	The species of tern for which this SPA is designated are sensitive to direct disturbance due to noise and anthropogenic activity. However, such disturbance is not considered to be remotely likely as a result of the proposed development, which is inland and separated by over 6km of open sea from the European Sea. No significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the site clearance and construction works at the proposed development site in Old Connaught could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground and surface water drainage network and from there, eventually, via the Rathmichael (Crinken) Stream, to the sea. However, there will be only low amounts of sediments displaced as a result of the proposed works that may leave the immediate working area. No changes in the water quality of the neighbouring waters or downstream are expected as a result. Dust, noise and vibration arising during the site clearance and construction will similarly be remote from this or any European site. Given the nature, size and location of the proposed development, as described in section 5.1.1 and 5.1.2, there would be no significant effects on the conservation objectives of the European site.	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		Even in the event of a pollution incident (such as fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site at Woodbrook, any pollution from the proposed site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the SAC any pollutants would be even further diluted and dissipated by the receiving waters. It would not be perceptible at the Dalkey Islands SPA, due to the very small volumes, Construction-related impacts as a result of the proposed development, on this European site or otherwise, can therefore be excluded. There is, further, no possibility of any other effects from the proposed development site on the SCIs of the SPA. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interest of this site as a result of the proposed development. There will be no operational impacts on this European site as a result of the proposed development.	
South Dublin Bay and River Tolka Estuary SPA (site code 004024), c.8.8km to the north	■ [A046] Light-bellied Brent Goose <i>Branta bernicla hrota</i> ■ [A130] Oystercatcher <i>Haematopus ostralegus</i> ■ [A137] Ringed Plover <i>Charadrius hiaticula</i> ■ [A141] Grey Plover <i>Pluvialis squatarola</i> ■ [A143] Knot <i>Calidris canutus</i> ■ [A144] Sanderling <i>Calidris alba</i> ■ [A149] Dunlin <i>Calidris alpina alpina</i> ■ [A157] Bar-tailed Godwit <i>Limosa lapponica</i> ■ [A162] Redshank <i>Tringa tetanus</i> ■ [A179] Black-headed Gull <i>Chroicocephalus ridibundus</i> ■ [A192] Roseate Tern <i>Sterna dougallii</i> ■ [A193] Common Tern <i>Sterna hirundo</i> ■ [A194] Arctic Tern <i>Sterna paradisaea</i> ■ [A999] Wetlands According to this SPA's site Conservation Objectives document (Version 1, dated 09 March 2015), for each of the listed SCIs, the Conservation Objective is to maintain the favourable	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SPA. The distant is over 8km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SPA as a result of the proposed development.	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	conservation condition of the species and wetland habitat for which the SPA has been selected.		
The Murrough SPA (site code 004186), c.9.7km to the south east	■ [A001] Red-throated Diver <i>Gavia stellata</i> ■ [A043] Greylag Goose <i>Anser anser</i> ■ [A046] Light-bellied Brent Goose <i>Branta bernicla hrota</i> ■ [A050] Wigeon <i>Anas crecca</i> ■ [A052] Teal <i>Anas crecca</i> ■ [A179] Black-headed Gull <i>Chroicocephalus ridibundus</i> ■ [A184] Herring Gull <i>Larus argentatus</i> ■ [A195] Little Tern <i>Sterna albifrons</i> ■ [A999] Wetlands According to this SPA's Conservation Objectives document (Version 1, dated 12 October 2022), for each of the listed SCIs, the Conservation Objective is to maintain or to restore the favourable conservation condition of the bird species and wetland habitat listed as Special Conservation Interests for this SPA.	No significant effects on water quality, and therefore on the site's SCI, are predicted. Surface/ground water arising during the site clearance and construction works at the proposed development site in Old Connaught could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground and surface water drainage network and from there, eventually, via the Rathmichael (Crinken) Stream, to sea. However, there will be only low amounts of sediments displaced as a result of the proposed works that may leave the immediate working area. No changes in the water quality of the neighbouring waters or downstream are expected as a result. Dust, noise and vibration arising during site clearance and construction will similarly be remote from this or any European site. Given the nature, size and location of the proposed development, as described in section 5.1.1 and 5.1.2, there would be no significant effects on the construction objectives of the European site. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site at Old Connaught, any pollution from the proposed site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the SPA any pollutants would be even further diluted and dissipated by receiving waters. It would not be perceptible at the Murrough SPA, due to the very small volumes, Construction-related impacts as a result of the proposed development, on this European site or otherwise, can therefore be excluded. There is, further, no possibility of any other effects from the proposed development site on the SCIs of the SPA. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development.	No



Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		There will be no operational impacts on this European site as a result of the proposed development.	
North-west Irish Sea SPA (site code 004236), c.14.1km to the north	■ [A001] Red-throated Diver <i>Gavia stellata</i> ■ [A003] Great Northern Diver <i>Gavia immer</i> ■ [A009] Fulmar <i>Fulmarus glacialis</i> ■ [A013] Manx Shearwater <i>Puffinus puffinus</i> ■ [A017] Cormorant <i>Phalacrocorax carbo</i> ■ [A018] Shag <i>Phalacrocorax aristotelis</i> ■ [A065] Common Scoter <i>Melanitta nigra</i> ■ [A179] Black-headed Gull <i>Chroicocephalus ridibundus</i> ■ [A182] Common Gull <i>Larus canus</i> ■ [A183] Lesser Black-backed Gull <i>Larus fuscus</i> ■ [A184] Herring Gull <i>Larus argentatus</i> ■ [A187] Great Black-backed Gull <i>Larus marinus</i> ■ [A188] Kittiwake <i>Rissa tridactyla</i> ■ [A192] Roseate Tern <i>Sterna dougallii</i> ■ [A193] Common Tern <i>Sterna hirundo</i> ■ [A194] Arctic Tern <i>Sterna paradisaea</i> ■ [A195] Little Tern <i>Sterna albifrons</i> ■ [A199] Guillemot <i>Uria aalge</i> ■ [A200] Razorbill <i>Alca torda</i> ■ [A204] Puffin <i>Fratercula arctica</i> ■ [A862] Little Gull <i>Hydrocoloeus minutus</i> According to this SPA's site Conservation Objectives document (Version 1 - dated 19 September 2023), for each of the listed SCIs, the Conservation Objective is to maintain or to restore the favourable conservation condition of the species for which the SPA has been selected.	No significant effects on the water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the site clearance and construction works at the proposed development site in Old Connaught could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground and surface water drainage network and from there eventually, via the Rahtmicaheal (Crinken) Stream, to the sea. However, there will be only low amount of sediments displaced as a result of the proposed works that may leave the immediate working area. No changes in the water quality of the neighbouring waters or downstream are expected as a result. Dust, noise and vibration arising during the site clearance and construction will similarly be remote from this or any European site. Given, the nature, size and location of the proposed development, as described in the Section 5.1.1 and 5.1.2, there would be no significant effects on the conservation objectives of the European site. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site at Old Connaught, any pollution from the proposed site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the SPA any pollutants would be even further diluted and dissipated by the receiving waters. It would not be perceptible at the North-West Irish Sea SPA, due to the very small volumes. Construction-related impacts as a result of the proposed development, on this European site or otherwise, can therefore be excluded. There is, further, no possibility of any other effects from the proposed development site in the SCIs of the SPA. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development.	No



Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		There will be no operational impacts on this European site as a result of the proposed development.	
North Bull Island SPA (site code 004006), c.14.3km to the north	■ [A046] Light-bellied Brent Goose <i>Branta bernicla hrota</i> ■ [A048] Shelduck <i>Tadorna tadorna</i> ■ [A052] Teal <i>Anas crecca</i> ■ [A054] Pintail <i>Anas acuta</i> ■ [A056] Shoveler <i>Anas clypeata</i> ■ [A130] Oystercatcher <i>Haematopus ostralegus</i> ■ [A140] Golden Plover <i>Pluvialis apricaria</i> ■ [A141] Grey Plover <i>Pluvialis squatarola</i> ■ [A143] Knot <i>Calidris canutus</i> ■ [A144] Sanderling <i>Calidris alba</i> ■ [A149] Dunlin <i>Calidris alpina alpina</i> ■ [A156] Black-tailed Godwit <i>Limosa limosa</i> ■ [A157] Bar-tailed Godwit <i>Limosa lapponica</i> ■ [A160] Curlew <i>Numenius arquata</i> ■ [A162] Redshank <i>Tringa totanus</i> ■ [A169] Turnstone <i>Arenaria interpres</i> ■ [A179] Black-headed Gull <i>Chroicocephalus ridibundus</i> ■ [A999] Wetlands According to this SPA's Site Conservation Objectives document (Version 1, dated 09 March 2015), for the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the bird species and wetland habitat listed as Special Conservation Interests for this SPA.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SPA. The distance is over 14km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SPA as a result of the proposed development.	No
Howth Head Coast SPA (site code 004113), c. 16.6km to the north east	■ [A188] Kittiwake <i>Rissa tridactyla</i> According to this SPA's Site Conservation Objectives document (Version 1, dated 29 October 2024), for the listed SCI, the Conservation Objective is to restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SPA. The distance is over 16km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SPA as a result of the proposed development.	No

Old Connaught Phase A1 LRD

Appropriate Assessment Screening Report

Site	Reasons for designation (information correct as of September 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Baldoyle Bay SPA (site code 004016), c. 19.5km to the north	■ [A046] Brent Goose <i>Branta bernicla hrota</i> ■ [A048] Shelduck <i>Tadorna tadorna</i> ■ [A137] Ringed Plover <i>Charadrius hiaticula</i> ■ [A140] Golden Plover <i>Pluvialis apricaria</i> ■ [A141] Grey Plover <i>Pluvialis squatarola</i> ■ [A157] Bar-tailed Godwit <i>Limosa lapponica</i> ■ [A999] Wetlands According to this SPA's Site Conservation Objectives document (Version 1, dated 27 February 2013), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the bird species and wetland habitat listed as Special Conservation Interests for this SPA.	There is no hydrological link or any other pathway between the subject site at Old Connaught and this SPA. The distance is over 19km and is completely unconnected. Furthermore, there will be no habitat loss, species fragmentation, or disturbance to the qualifying interests of this SPA as a result of the proposed development.	No



5.2 Summary of potential impacts of the Proposed Development

The proposed development will not result in land-take from any European site and there will be no resource requirements such as water abstraction. Similarly, there will be no emissions to air from construction vehicles that could remotely impact any European site. Dust, noise and vibration arising during construction will similarly be entirely remote from any European site.

There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the construction or operation of the proposed development, no predicted impact on *ex-situ* species and no interference with the key relationships that define the structure or function of any European site.

There will also be no significant effects on any European sites as a result of:

- Land-take.
- Resource requirements such as water abstraction.
- Impacts to habitat structure.
- Mortality to species (such as roadkill).
- Noise pollution / vibration impacts.
- Water pollution.
- Disturbance.
- Light pollution.
- Emissions to air.

Additionally, for the reasons outlined in this report for the European sites, no impacts on any other designated sites including proposed Natural Heritage Areas, will occur.

6 Mitigation specific to European sites

This screening assessment is consistent with the judgment of the European Court in Case C-323/17, *People Over Wind & Sweetman v Coillte* (Judgment of the Court (Seventh Chamber) of 12 April 2018) and the recent case-law of the High Court, including *Heather Hill Management Company CLG v An Bord Pleanála* [2019] IEHC 450 and *Sweetman v An Bord Pleanála* [2020] IEHC 39.

It is also consistent with the judgment in *Eco Advocacy CLG v An Bord Pleanála* [2021] IEHC 265. In that case, Humphreys J confirmed the core legal principle, being that regard should not be had to mitigation measures at AA screening stage. Humphreys J decided in that case that clarification was required from the CJEU on the matter (as it related to the consideration of SuDS and whether these represented mitigation measures).

The CJEU, in its ruling on this case dated 15 June 2023 clarified issues defining mitigation in the context of European sites². It confirmed that Article 6(3) of Directive 92/43 *must be interpreted as meaning that, in order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site.*

In relation to European sites, there will be no impacts capable of giving rise to any likely significant effects as a result of the completion of the proposed development. SuDS measures such as swales, permeable paving, green roofs will be incorporated into the design of the development as standard features. These standard measures are considered best practice in construction and, therefore reasonable scientific doubt concerning their effectiveness can be ruled out.

²<https://curia.europa.eu/juris/document/document.jsf?text=&docid=274644&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=21723482>

As set out in this report, it is certain that likely significant effects on European sites as a result of both the construction and operation of the development can be excluded. Even if no SuDS measures were to be incorporated into the design there could be no impacts on European sites.

No mitigation is necessary or proposed for the protection of European sites.

7 In-combination effects

It is a requirement of Section 177U of the Planning Acts that, when considering whether a plan or project will have a significant effect on a European site, the assessment must take into account in-combination effects with other plans and projects. The assessment should consider plans and projects that are completed, approved but uncompleted, or proposed (but not yet approved).³ If there are identified effects arising from the plan or project, even if they are perceived as minor and not likely to have an effect on a European site alone, then these effects must be considered ‘in-combination’ with the effects arising from other plans and projects.

The following sources were consulted to identify relevant other plans or projects:

- Dún Laoghaire Rathdown County Council Planning Viewer (September 2026);
- The National Planning Application database (www.myplan.ie – accessed September 2026);
- EIA Portal (www.housinggov.ie/maps.arcgis.com – accessed September 2026).
- Old Connaught Local Area Plan 2025.
- Dún Laoghaire-Rathdown County Development Plan 2022 – 2028.

Permitted and proposed projects in the immediate vicinity of the site were considered in terms of the potential for in-combination effects. There are no developments planned, permitted or under construction that will give rise to any significant effects on European sites in combination with the proposed development. This includes projects now either permitted, under construction or complete and occupied, all of which were subject to Appropriate Assessment Screening including the following, all to the east of the M11:

- Woodbrook Phase 1 (ABP Reference: 305844 (amended by DLR Reg. Ref.: LRD24A/0482/WEB)).
- Woodbrook Phase 2 (DLR Reg. Ref.: LRD24A/0382/WEB).
- Shanganagh Castle (ABP Reference 306583).
- Proposed residential development at Woodbrook DART Gateway, Dublin 18 (Dún Laoghaire-Rathdown County Council Part 8 development)

Considering the nature and scale of the proposed development, the localised nature of the environmental effects predicted to occur as a result of the completion of the proposed development, and the nature of existing, proposed development in its environs, it is considered that significant in combination effects on European sites are not likely to occur.

Furthermore, the zoning, policies and objectives set out in both the Dún Laoghaire Rathdown County Development Plan 2022 – 2028 and the Old Connaught Local Area Plan 2025 are intended to protect the environment while encouraging development in appropriate areas. The proposed development complies with these objectives in the context of Appropriate Assessment.

It is considered that significant in-combination effects on European sites are not likely to occur as a result of the proposed development in combination with other plans or projects.

³ *Assessment of Plans and Projects in relation to Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, September 2021)*

8 Screening conclusion

In view of best scientific knowledge this report concludes that the proposed development at Old Connaught (Phase A1) individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dún Laoghaire-Rathdown County Council) to carry out an Appropriate Assessment Screening under section 177U of the Planning Acts and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives.

9 References

- Chartered Institute of Ecology and Environmental Management (CIEEM) (2024). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (Version 1.3).
- Department of Environment, Heritage and Local Government (DoEHLG) (2010a). Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities.
- Department of Environment, Heritage and Local Government (DoEHLG) (2010b). Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.
- Department of Housing, Local Government and Heritage (DHLGH) (2025). EIA Portal. Available at: www.housing.gov.ie/maps/eiadaashboard
- National Parks and Wildlife Service (NPWS) (2022). Bat Mitigation Guidelines for Ireland V2 – Irish Wildlife Manuals No. 134.
- National Parks and Wildlife Service (NPWS) (2006). Bat Mitigation Guidelines for Ireland – Irish Wildlife Manuals No. 25.
- National Parks and Wildlife Service (NPWS) (2023). Ireland's 4th National Biodiversity Action Plan 2023–2030.
- National Parks and Wildlife Service (NPWS) (December 2025). The Status of EU Protected Habitats and Species in Ireland – Article 17 Report.
- National Roads Authority / Transport Infrastructure Ireland (NRA/TII) (2009). Guidelines for Assessment of Ecological Impacts of National Road Schemes.
- Office of the Planning Regulator (OPR) (2021). Practice Note PN01: Appropriate Assessment Screening for Development Management.
- Office of Public Works (OPW) (2009). The Planning System and Flood Risk Management: Guidelines for Planning Authorities.
- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive").
- 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").
- European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) (SI No. 477 of 2011).
- Flora (Protection) Order 2022.
- Planning and Development Act, 2000 (as amended).
- The Wildlife Acts (1976 and 2000, as amended).
- European Commission (2018). Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission (2021). Assessment of Plans and Projects in Relation to Natura 2000 Sites – Methodological Guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
- European Commission Directorate-General for Environment (2021). Guidance Document on the Strict Protection of Animal Species of Community Interest under the Habitats Directive.
- Dún Laoghaire-Rathdown County Council (2022). Dún Laoghaire-Rathdown County Development Plan 2022–2028, including accompanying Natura Impact Report.
- Dún Laoghaire-Rathdown County Council (2025). Old Connaught Local Area Plan 2025, including accompanying Natura Impact Report.
- AtkinsRéalis (2026). Old Connaught Phase A1 LRD – Stormwater Impact Assessment Report.
- Fitzgerald Ecology (May 2026). Hedgerow Appraisal Survey – Old Connaught Phase A1 LRD.
- Foulkes *et al.* (2013). Hedgerow Appraisal System.
- Uisce Éireann (18 February 2026). Confirmation of Feasibility – Foul Water Arrangements, Old Connaught Local Area Plan.
- Wildlife Surveys Ireland (2025–2026). Bat Survey Report – Old Connaught Phase A1 LRD.
- Bat Conservation Ireland (www.batconservationireland.org) – accessed July 2026.
- BirdWatch Ireland (www.birdwatchireland.ie) – accessed July 2026.

- Catchments.ie (www.catchments.ie) – Irish catchment data – accessed July 2026.
- Dún Laoghaire-Rathdown County Council. Planning Viewer – accessed July 2026.
- Environmental Protection Agency (EPA) (www.epa.ie) – water quality data – accessed July 2026.
- EPA (www.catchments.ie) – watercourse mapping – accessed July 2026.
- Geohive (www.geohive.ie) – OSi mapping and aerial imagery – accessed July 2026.
- Geological Survey of Ireland (www.gsi.ie) – soils, geology and hydrogeology data – accessed July 2026.
- MyPlan.ie (www.myplan.ie) – land use zoning information – accessed July 2026.
- National Biodiversity Data Centre (NBDC) (www.biodiversityireland.ie) – accessed July 2026.
- National Parks and Wildlife Service (NPWS) (www.npws.ie) – European site designation data – accessed July 2026.
- National Planning Application Database (www.myplan.ie) – accessed July 2026.

Appendix I: Background

The European⁴ network is a Europe-wide network of ecologically important sites (SPAs and SACs – also known as ‘European sites’ or ‘Natura 2000 sites’) that have been designated for protection under either the EU Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) or the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna).

The main aim of the Habitats Directive is “to contribute towards ensuring biodiversity through the conservation of natural habitats of wild fauna and flora in the European territory of the Member States to which the treaty applies”. Any actions taken must be designed to “maintain or restore, at a favourable conservation status, natural habitats and species of wild fauna and flora of Community interest”. Under Article 6 of the Habitats Directive, an assessment is required where a plan or project is not directly connected with or necessary to the management of a European site but may give rise to significant effects upon a European site.

In addition, it is a matter of law that candidate SACs (cSACs), candidate SPAs (cSPAs) and Sites of Community Importance (SCI) are considered in this process and treated the same as SACs and SPAs.

Article 6 (paragraphs (3) and (4)) of the Habitats Directive states that:

(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have 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.

(4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

The requirements of the Habitats Directive are transposed into Irish law by means of the *European Union (Birds and Natural Habitats) Regulations 2011-2021* (hereafter referred to as the *Birds and Habitats Regulations*)⁵ and by the *Planning and Development Act 2000*, as amended.

In Ireland, the statutory agency responsible for the designated areas is NPWS.

Stages in the assessment

European Commission guidance (2021)⁶ sets out the principles on how to undertake decision making in applying the Habitats Directive. The requirements of the Habitats Directive comprise three distinct stages”:

Stage one: screening. The first part of the procedure consists of a pre-assessment stage (‘screening’) to ascertain whether the plan or project is directly connected with, or necessary to, the management of a

⁴ The EU Habitats Directive, Article 3.1, states “A Coherent European ecological network of Special Areas of Conservation and Special Protection Areas pursuant to Directive 79/409/EEC shall be set up under the title Natura 2000”

⁵ SI No. 477 of 2011 and subsequent amendments

⁶ [Assessment of Plans and Projects in relation to Natura 2000 sites: Methodological Guidance on the Provisions of Article 6\(3\) and \(4\) of the Habitats Directive 92/43/EEC \(European Commission Environment Directorate-General, September 2021\)](#)

Natura 2000 site, and, if this is not the case, then whether it is likely to have a significant effect on the site (7) (either alone or in combination with other plans or projects) in view of the site's conservation objectives. Stage one is governed by the first part of the first sentence of Article 6(3).

Stage two: the appropriate assessment. If likely significant effects cannot be excluded, the next stage of the procedure involves assessing the impact of the plan or project (either alone or in combination with other plans or projects) against the site's conservation objectives, and ascertaining whether it will affect the integrity of the Natura 2000 site, taking into account any mitigation measures. It will be for the competent authorities to decide whether or not to approve the plan or project in light of the findings of the appropriate assessment. Stage two is governed by the second part of the first sentence and the second sentence of Article 6(3).

Stage three: derogation from Article 6(3) under certain conditions. The third stage of the procedure governed by Article 6(4). It only comes into play if, despite a negative assessment, the developer considers that the plan or project should still be carried out for imperative reasons of overriding public interest. This is only possible if there are no alternative solutions, the imperative reasons of overriding public interest are duly justified, and if suitable compensatory measures are adopted to ensure that the overall coherence of Natura 2000 is protected.

Appendix II Conservation Objectives of European sites

The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below⁷:

The conservation status of a natural habitat will be taken as 'favourable' when:

- its natural range and the area it covers within that range are stable or increasing, and
- the specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future, and
- the conservation status of its typical species is favourable as defined (i).

The conservation status of a species will be taken as favourable when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

The 2019 Guidance from the European Commission⁸ indicates that the general objective of achieving FCS for all habitat types and species listed in Annexes I and II to the Habitats Directive needs to be translated into site-level conservation objectives.

The European Commission guidance recommends that screening should fulfil the following steps:

1. ascertaining whether the plan or project is directly connected with or necessary to the management of a Natura 2000 site;
2. identifying the relevant elements of the plan or project and their likely impacts;
3. identifying which (if any) Natura 2000 sites may be affected, considering the potential effects of the plan or project alone or in combination with other plans or projects;
4. assessing whether likely significant effects on the Natura 2000 site can be ruled out, in view of the site's conservation objectives.

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701>

⁸ [Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. \(European Commission 2019\)](#)

Brady Shipman Martin

DUBLIN

Mountpleasant Business Centre
Mountpleasant Avenue
Dublin 6

CORK

Penrose Wharf Business Centre
Penrose Wharf
Cork

+353 1 208 1900

mail@bradyshipmanmartin.com

www.bradysipmanmartin.com

