



Screening for Appropriate Assessment

No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24 - Strategic Housing Development

Date: May 2022

For: Bluemont Developments (Firhouse) Limited



Note

Works, plans, methodologies, materials, and infrastructural requirements are based on the client's brief, draft plans, and drawings provided to Flynn Furney Environmental Consultants of May 2022.

Statement of Authority

This Appropriate Assessment Screening has been carried out by suitably qualified and experienced professionals of Flynn Furney Environmental Consultants. These were Ian Douglas BSc, MSc and Billy Flynn BSc, MSc, MCIEEM, CEnv.

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1 INTRODUCTION

Works are proposed at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24. The following report has been drawn up to provide information for South Dublin County Council. The report includes a general ecological assessment of the site and the surrounding area, including designated sites.

This screening exercise aims to determine whether the proposed construction and operation of the residential development may have the potential to impact the conservation objectives and overall integrity of any Natura 2000 sites significantly or indeterminately. This assessment is based upon desk research and fieldwork carried out by suitably qualified ecologists.

Designated sites within 15km of the proposed development as well as other relevant sites have been reviewed for potential impacts or pathways for impacts. This is followed by an ecological assessment of the project area, including possible impacts on designated sites. Section 5 of the report comprises the AA Screening that focuses on any potential impacts on Natura 2000 sites and their conservation objectives.

This report has been completed to provide the information necessary to allow the competent authority to conduct an Article 6[3] Appropriate Assessment (AA) Screening of the proposed development. The legislation and methodology for which is detailed in the following sections below.

1.1 Relevant Legislation and Overall Screening Methodology

The methodology for this screening statement is set out in a document prepared for the Environment DG of the European Commission entitled 'Assessment of plans and projects significantly affecting Natura2000 sites: Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC' (European Commission, 2019). This report and contributory fieldwork were carried out by guidelines given by the Department of Environment, Heritage and Local Government (2009, amended February 2010).

The process is given in Articles 6(3) and 6(4) of the Habitats Directive and is commonly referred to as 'Appropriate Assessments' (which refers to Stage 2 in the sequence under the Habitats Directive Article 6

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

“Any plan or project not directly connected with or necessary to the management of the (Natura2000) site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

Article 6(4) of the same directive states:

“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 social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of the 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.”

It is the responsibility of the proponent of the plan or project to provide the relevant information (ecological surveys, research, analysis etc.) for submission to the ‘competent national authority’. Having satisfied itself that the information is complete and objective, the competent authority will use this information to screen the project, i.e. to determine if an AA is required and to carry out the AA, if one is deemed necessary. The competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.

The appropriate assessment process has four stages. Each stage determines whether a further stage in the process is required. If, for example, the conclusions at the end of Stage One are that there will be no

significant impacts on the Natura 2000 site, there is no requirement to proceed further. The four stages are:

1. Screening to determine if an appropriate assessment is required
2. Appropriate assessment
3. Consideration of alternative solutions
4. Imperative Reasons of Overriding Public Interest/Derogation

Stage 1 : Screening

This is to determine if an appropriate assessment is required. Screening is the technique applied to determine whether a particular plan would be likely to have significant effects on a Natura 2000 site and would thus warrant an Appropriate Assessment. The key indicator that will determine if an Appropriate Assessment is required is the determination of whether the development is likely to have significant environmental effects on a Natura 2000 site or not.

Stage 2. Appropriate Assessment

This step is required if the screening report indicates that the development is likely to have a significant impact on a Natura 2000 site. Stage 2 assesses the impact of a plan or project on the integrity of the Natura 2000 site, either alone or in combination with other plans or projects, with respect to the site's structure, function and conservation objectives. Where there are adverse impacts, an assessment of the potential mitigation of these impacts is also required.

Stage 3. Assessment of Alternative Solutions

If it is concluded that, subsequent to the implementation of measures, a plan or project will have an adverse impact on the integrity of a Natura 2000 site, it must be objectively concluded that no alternative solutions exist before the plan or project can proceed.

Stage 4. Imperative Reasons of Overriding Public Interest/Derogation

Where no alternative solutions exist and where adverse impacts remain but imperative reasons of overriding public interest (IROPI) exist for the implementation of a plan or project, an assessment of compensatory measures that will effectively offset the damage to the Natura 2000 site will be necessary.

Flynn, Furney Environmental Consultants Ltd has been appointed by Bluemont Developments Limited to undertake the first stage of the above process: a screening exercise to determine whether the proposed development has the potential to have any significant or indeterminate impacts on the conservation objectives and overall integrity of any Natura 2000 sites.

This assessment is based upon desk study and fieldwork carried out by suitably qualified ecologists. Sites within 15km of the proposed development and other relevant sites are reviewed for potential impacts or pathways for impacts. Section 3 of the report comprises the AA Screening that specifically focuses on the potential for impacts on Natura 2000 sites and their conservation objectives.

1.2 Description of the Proposed Development

The development will consist of the demolition of all existing structures (c. 1,326 sq m) on site. The development with a total gross floor area of c. 11,638 sq m, will consist of 100 no. residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height, over lower ground floor and basement levels, comprising:

- 96 no. apartments (consisting of 2 no. studio units; 45 no. one bedroom units; 10 no. two bedroom (3 person) units; 34 no. two bedroom (4 person) units; and 5 no. three bedroom units), together with private (balconies and private terraces) and communal amenity open space provision at podium and roof levels; and
- 4 no. duplex apartments (consisting of 2 no. one bedroom units and 2 no. two bedroom units (4 person) located within Block B01, together with private balconies and terraces.

The development will also consist of non-residential uses (c. 355 sq m), including:

- 1 no. café (c. 58 sq m) and 1 no. office (c. 30 sq m) located at ground floor level of Block B01;
- 1 no. medical unit (c. 59 sq m) and 1 no. betting office (c. 66 sq m) located at ground floor level of Block B02;
- 1 no barber shop (c. 28 sq m) located at ground floor level between Blocks 01 and 02; and

- 1 no. crèche (c. 114 sq m) located at lower ground floor level of Block B01 and associated outdoor play area to the rear.

Vehicular access to the site will be from the existing access off Firhouse Road. The proposal includes minor alterations to the existing access, including the provision of new and enhanced pedestrian infrastructure.

The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, basement car parking (80 no. spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and Mount Carmel Park); ducting; plant; waste management provision; SuDS measures; stormwater management and attenuation; sustainability measures; signage; public lighting; and all ancillary site development and excavation works above and below ground.

1.3 Stakeholders and Consultation The consultations carried out to date are summarised below:

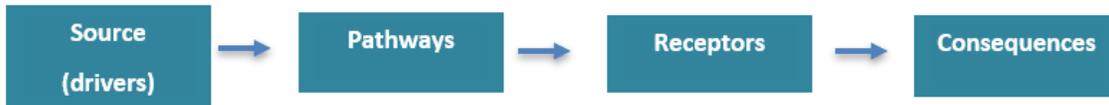
Table 1: Summary of Consultations

Stakeholder	Nature of Consultation	Outcome
Tom Philips & Associates Ltd (Town Planners, on behalf of the client)	Site visit Scope of project agreed Need for this assessment agreed	<ul style="list-style-type: none"> • Site visits & Assessments Completed. • Desktop Research carried out • Appropriate Assessment Screening carried out • Non-requirement for a Stage II Appropriate Assessment confirmed.
National Parks and Wildlife Service	This report to be forwarded to Development	Pending (as required).

	Applications Unit if required.	
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1.4 The Source-Pathway-Receptor Approach

Consideration has also been given to the ‘source-pathway-receptor approach.’ This is a standard tool in environmental assessment.



The source-pathway-receptor concept in ecological impact assessment relates to the idea that for the risk of an impact to occur, a 'source' is needed, e.g. a construction site; then a 'receptor', in this case, sites designated for nature conservation; and finally a 'pathway' between the source and the receptor, this could be a watercourse that links the development site to the designated site. Even though there might be a risk of an impact that does not mean that it might necessarily occur, and if it does occur, it may not be significant. Identification of a risk 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 risk and the characteristics of the receptor (in this instance, this is any Natura 2000 sites).

1.5 Zone of influence

The proximity of the proposed development area to European sites, and Qualifying Interests (QIs)/ Special Conservation Interests (SCIs) of European sites, is of importance when identifying potentially likely significant effects. During the initial scoping of this report, a 15 km ZOI was applied for impact assessment. A conservative approach has been used, which minimises the risk of overlooking distant or obscure effect pathways, while also avoiding reliance on buffer zones within which all European sites should be considered. This approach assesses the complete list of all QIs/SCIs of European sites in Ireland (i.e. potential receptors), instead of listing European sites within buffer zones.

This follows Irish departmental guidance on AA:

“For projects, the distance could be much less than 15 km, 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” (DoEHLG, 2010, p. 32).

Following the guidance set out by the National Roads Authority (NRA, 2009), the proposed development has been evaluated based on an identified Zol with regard to the potential impact pathways to ecological features (e.g. mobile and static). The Zol of the proposed development on mobile species (e.g. birds, mammals, and fish), and static species and habitats (e.g. saltmarshes, woodlands, and flora) is considered differently. Mobile species have ‘range’ outside of the European site in which they are QI/SCI. The range of mobile QI/SCI species varies considerably, from several metres (e.g. in the case of whorl snails *Vertigo* spp.), to hundreds of kilometers (in the case of migratory wetland birds). Whilst static species and habitats are generally considered to have Zols within close proximity of the proposed development, they can be significantly affected at considerable distances from an effect source; for example, where an aquatic QI habitat or plant is located many kilometres downstream from a pollution source. Hydrological linkages between the proposed development and European sites (and their QIs/SCIs) can occur over significant distances; however, any effect will be site specific depending on the receiving water environment and nature of the potential impact. A reasonable worst-case Zol for water pollution from the proposed greenway is considered to be the surface water, wherein the proposed works are to be located. The likely effects of the proposed development on European sites has been appraised using a source-pathway-receptor model, where:

- A ‘source’ is defined as the individual element of the proposed development that has the potential to impact on an European site, its qualifying features and its conservation objectives;
- A ‘pathway’ is defined as the means or route by which a source can affect the ecological receptor;
and
- A ‘receptor’ is defined as the Special Conservation Interests of Special Protection Areas (SPA) or Qualifying Interests (QI) of Special Areas of Conservation (SAC) for which Conservation Objectives have been set for the European sites being screened.

2 ECOLOGICAL ASSESSMENT WORKS

2.1 Desktop Study

A desktop study was carried out as part of the screening process. This included a review of available literature on the site and its immediate environs. Sources of information included the National Parks and Wildlife Service and National Biodiversity Data Centre databases on protected sites and species. Additionally, a number of databases on individual protected species and non-native invasive species were consulted.

2.2 Designated Sites

Sites designated for the conservation of nature in Ireland include:

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

SPAs and SACs form the *Natura 2000* network of sites. It is these sites that are of relevance to the screening process for this Appropriate Assessment.

SPAs and SACs are prime wildlife conservation areas in the country, considered to be important on a European as well as Irish level. SPAs and SACs are designated under EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended.

All *Natura 2000* designated sites within 15km of the site and other relevant sites with regard to the source-pathway-receptor model were considered during the desktop study stage of this screening assessment in order to assess the potential for significant effects upon their Qualifying Interests / Special Conservation Interests and Conservation Objectives. This stage of the process is used to determine whether any of the designated sites may be 'screened out'. That is, that they can be regarded as not being relevant to the process, having no potential to be significantly affected or impacted upon.

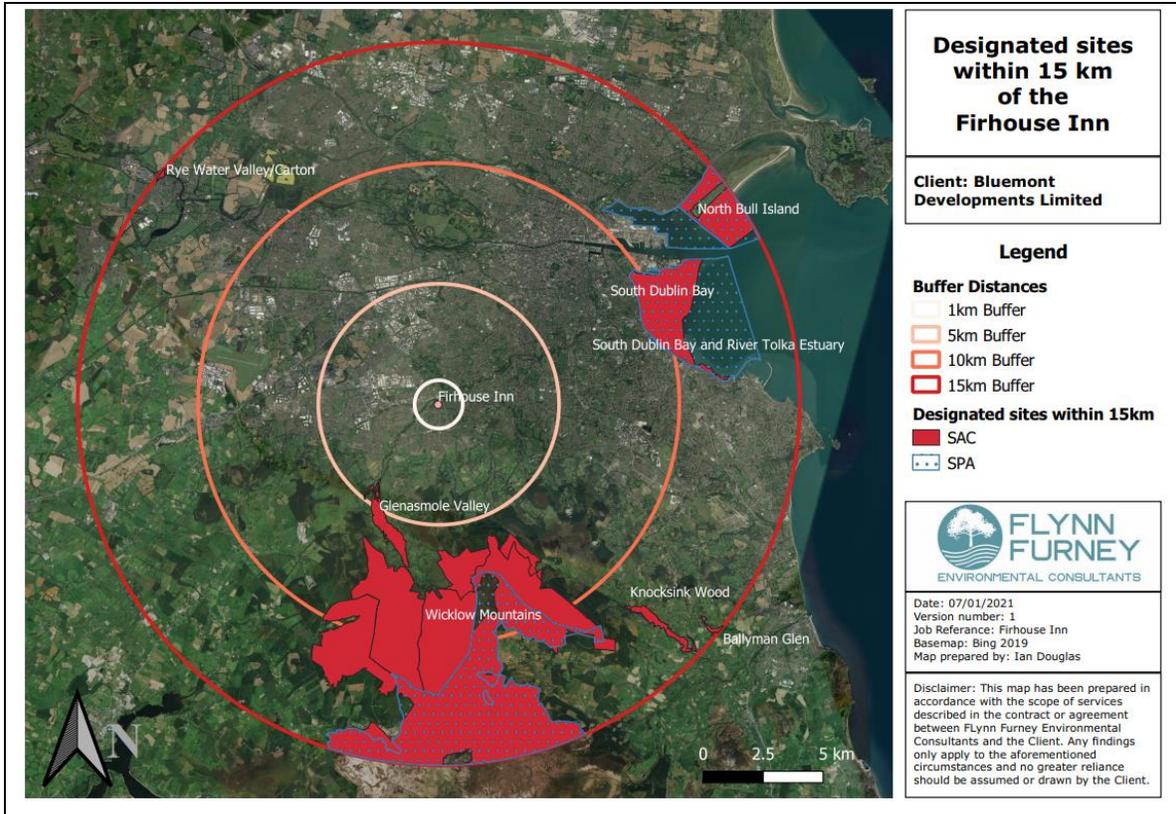
2.3 Designated Sites Within 15km of the Proposed Works and other Relevant Sites

All Natura 2000 designated sites within 15km of the proposed works and other relevant sites within a potential zone of influence of the proposed works were considered during the screening process for their potential to have significant effects upon their qualifying interests or conservation objectives. The site synopses and conservation objectives of the sites (as available) were also examined during this stage of the survey. These sites are given in the table below. The table also gives distance from the proposed site of works and the outcome of the screening.

Table 2: Distances from the proposed developments to the nearest designated sites

Site Code	Site Name	Designation	Distance from designated site	Likelihood of impact
1209	Glenasmole Valley SAC	SAC	3.9km	None identified
2122	Wicklow Mountains SAC	SAC	6.0km	None identified
4040	Wicklow Mountains SPA	SPA	7.2km	None identified
210	South Dublin Bay SAC	SAC	9.3km	None identified
4024	South Dublin Bay and River Tolka Estuary SPA	SPA	9.3km	None identified
725	Knocksink Wood SAC	SAC	11.4km	None identified
4006	North Bull Island SPA	SPA	11.5km	None identified
206	North Dublin Bay SAC	SAC	13.1km	None identified
713	Ballyman Glen SAC	SAC	14.2km	None identified
1398	Rye Water Valley/Cartron SAC	SAC	14.8km	None identified

Figure 1: Designated sites within 15km



No risks to the conservation objectives of any Natura 2000 sites are considered likely due one or more of the following:

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

The proposed development is not considered likely to give rise to any significant impacts on any Natura 2000 designated sites. The development does not have potential for any *direct* impacts given its location (outside and removed from any such sites) and nature (works within a built area and no semi-natural or natural areas to be affected). No *indirect* impacts are predicted on any Natura 2000 sites. This is due to the relatively small scale and limited nature of the proposed works. The nearest Natura sites to the

Firhouse Inn are Glensmole Valley SAC and Wicklow Mountains SAC. These are to the south of the project and upstream of the project's location close to the River Dodder. There is thus no likely path for any impacts to these sites. There is no direct hydrological connectivity to any Natura site. The proposed development site is located within 0.2km of the River Dodder. This watercourse connects to South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA. Storm water from the site will discharge to an existing surface water system which will eventually discharge to the River Dodder. However, as this surface water route from the site currently exists, no additional potential for impacts has been identified. The distance between these above designated sites and proposed works location contributes to the lack of any likely impact

2.4 Field Surveys

Initial field surveys were carried out in September 2020 and January 2021 and the baseline ecological conditions were assessed. Habitats were identified, mapped and classified and dominant plant species noted according to the guidelines given by the JNCC (2010) and Smith et al. (2011). Any signs of mammals seen were recorded as part of these surveys. A dedicated bird survey was not carried out as part of the survey. However, any species observed were noted and recorded. Any suitable habitat for amphibian and reptile species was recorded. Habitat classification followed Fossitt (2000) and the floral nomenclature used follows Parnell and Curtis (2012) and Scannell and Synnott (1987). Subsequent surveys of the existing buildings for bat roosts and bat roosting habitat in the grounds were also carried out in 2021 and 2022. A dedicated bird nesting activity survey and a survey specifically for invasive species were also carried out in 2022.

2.5 Detailed Description of Habitat Areas

A detailed description of habitat areas recorded within or adjacent to the survey area is given below. The area under study is comprised almost entirely of recent buildings and other artificial surfaces (BL3) which includes the former Firhouse Inn, other buildings and the car park.

Other habitats types within and surrounding the proposed development include:

2.5.1 Treelines (WL2)

The proposed site of works is bounded to the north, north-west and west by a mature treeline. This is a mixed treeline that is made up of mature Sycamore (*Acer pseudoplatanus*), Beech (*Fagus sylvatica*) and Horse Chestnut (*Aesculus hippocastanum*). Sycamore is probably the most numerous of the three species. The trees are large (up to 20m in height and with a canopy spread of up to 8m).

2.5.2 Improved agricultural grassland (GA1)

The lands immediately adjacent to the existing Firhouse Inn and curtilage would conform to this category. This is a relatively species-poor habitat type that is dominated by a few agricultural grasses such as Cocksfoot (*Dactylis glomerata*) and Bent grasses (*Agrostis* spp.). Other abundant plants here include Creeping Buttercup (*Ranunculus repens*) and White Clover (*Trifolium repens*). These lands have been grazed in recent times.

2.5.3 Amenity Grassland

This habitat type occurs in the lands to the north of the site and the agricultural grassland described above. This habitat type makes up much of the Dodder Valley Linear Park which is within around 100m of the site proposed for development. This grassland type is also rather species-poor and dominated by a few grass species such as Bent grasses and Meadow grasses. Clovers (*Trifolium* spp.) are abundant here and Plantains (e.g. *Plantago lanceolata*) and Thistles (*Cirsium* spp.) are occasional.

2.5.4 Scrub (WS1)

Some limited areas of scrub occur on the edges of the agricultural fields and on the boundaries of the Dodder Valley Linear Park. These areas are dominated by Bramble (*Rubus fruticosus* agg.) along with some limited Blackthorn (*Prunus spinosa*).

2.5.5 Significance of Habitats

None of the habitats occurring within or surrounding the site are of high sensitivity, most of the area having been modified from its natural state by development. There are no Annex I habitats occurring within the area proposed for works. No rare, threatened or protected species of plants as per the Red Data List (Wyse Jackson et al 2016) were found. No species listed in the Flora Protection Order (2015) were found to be growing within the site.

2.6 Fauna

2.6.1 Mammal Activity

No evidence of presence or activity of any protected mammal species was noted within the site. It is noted that records of Otter (*Lutra Lutra*) exist from the Dodder. It is also noted that suitable habitat for Badger (*Meles meles*) exists within the agricultural lands and adjacent Dodder Valley Park. However, no refugia of these species was found within the area under survey and the site proposed for development would not hold any suitable habitat for these species.

2.6.2 Bats

Two bat surveys including dedicated search for bat habitation (by Flynn Furney Environmental Consultants, May 2022) was carried out as part of the surveys contributing to this report. No bats or evidence of bat presence was noted in any of the buildings here. However, further surveys are recommended prior to any construction at this site. Detailed reports on these surveys have been compiled for the client and are to be submitted with this report.

2.6.3 Breeding Birds

Birds seen and heard during the initial site surveys were recorded. All of the birds recorded were species typical of this kind of an urban fringe environment. These included Blue and Great Tits (*Parus caeruleus*), Robin (*Erithacus rubecula*), Wren (*Troglodytes troglodytes*) and Blackbird (*Turdus merula*). No 'red-listed' species or birds of higher conservation concern were noted.

A dedicated breeding bird survey of the building and adjacent mature trees was carried out in April 2022. No bird nesting activity was found within the buildings and the curtilage here. Likely breeding of Wood Pigeon (*Columba palumbus*) was recorded within the treeline of mature trees adjacent the site. A detailed report on this survey has been compiled for the client and is to be submitted with this report.

The Dodder river which is close to the site is known to support a number of protected bird species including Kingfisher (*Alcedo atthis*), Dipper (*Cinclus cinclus*), Coot (*Fulica atra*), Moorhen (*Gallinula chloropus*) and Grey Wagtail (*Motacilla cinerea*). The Dodder is not within the zone of influence of the proposed development.

2.6.4 Wintering Wildfowl

No suitable habitat for these species is found within the site under survey.

2.6.5 Freshwater Species, Reptiles and Amphibians

There are no watercourses within the site proposed for works. The entire site was surveyed for the presence of the Common Frog (*Rana temporaria*), Smooth Newt (*Lissotriton vulgaris*) and the Common Lizard (*Lacerta vivipara*). There are no suitable breeding sites for these species within the site. The River Dodder was recorded within 200 meter of the site. The Dodder is likely to support at least Common Frog (*Rana temporaria*) and possibly Lizard (*Lacerta vivipara*). The Dodder river is outside the zone of influence of the proposed development.

2.6.6 Significance of Fauna

No species listed on Annex II of the Habitats Directive were found to be occurring on the site. No evidence of any protected mammal species within the site was found during survey. While all bird species are protected to some extent under Irish legislation, the habitat types found here do not offer nesting habitat for any (Birds Directive) Annex species.

2.6.7 Invasive Species

A dedicated invasive species survey of the site was carried out in April 2022. No invasive species listed on the Schedule 3 of the European Communities (Birds and Natural Habitats) Regulations 2011 were found during the survey. A detailed report on this survey has been compiled for the client and is to be submitted with this report.

2.7 Recommendations Arising from Ecological Survey

The following recommendations are made with regard to the ecological interests of the site:

Table 3: Ecological Recommendations

Ecological Interest	Recommendation
Mature Hedgerows/Treelines	All of the existing mature trees should be retained. All construction activities should be planned so as to avoid any impacts. A buffer zone to protect these is recommended.
Bats	A preconstruction survey of the site is recommended as bat habitation may occur before commencement of works. Ecologist supervision of a portion of the works is also recommended.
	It is recommended that a bat expert is engaged to assist with the lighting design proposals for the site. This is to prevent any ongoing impacts to bat species.
Breeding Birds	A preconstruction survey of the site is recommended as bird nesting may occur before commencement of works. No woody vegetation should be removed during the bird nesting season (March-August inclusive).
Invasive Species	A medium impact species – Buddleia – should be removed from the site on the commencement of site clearance.

3 ARTICLE 6(3) SCREENING ASSESSMENT

This section of the report focuses solely on the potential for the proposed works to impact upon Natura 2000 sites. Section 2.1.2 of this report excluded any direct impacts or pathways for impacts on any Natura 2000 sites. This was based upon the proximity of the designated sites to the proposed development. The potential for impacts on the Natura 2000 sites is considered below.

3.1 Article 6(3) Assessment Criteria

3.1.1 Description of the individual elements of the project likely to give rise to impacts on the Natura 2000 site.

None of the individual elements of the proposed development as planned are likely to give rise to significant impacts on the Natura 2000 sites, given the limited scale of the works and location of the works as planned.

3.1.2 Description of any Likely Direct, Indirect or Secondary Impacts of the Project on the Natura 2000 Site.

Any likely direct, indirect or secondary impacts of the proposed development, both alone and in combination with other plans or projects, on any Natura 2000 sites by virtue of the following criteria: size and scale, land take, distance from the Natura 2000 site or key feature thereof, resource requirements, emissions, excavation requirements, transportation requirements and duration of construction, operational and decommissioning phases of the works are detailed in the table below.

Table 4: Assessment of Likely Impacts

ASSESSMENT OF LIKELY IMPACTS	
size and scale	The proposed works site is of approximately 0.5 hectares in surface area. There will be no impact on any Natura 2000 Sites owing to size or scale of the proposed works.
land-take	No works are proposed within any designated site. Works will not alter the size of any designated sites. Therefore land-take is nil.
Distance from the Natura	Glenasmole Valley SAC is the nearest designated site at a remove of 3.9km.

2000 site or key features of the site;	
Resource requirements (water abstraction etc.);	No materials for construction will be sourced from within any Natura 2000 Site. No water will be abstracted from the site during the construction or operation of the proposed development. Mains water will be used for the operational phase of the project. Therefore, there will be no impact on any Natura site as a result of resource requirements.
emissions (disposal to land, water or air);	There will be no additional emissions of water from the site. Drainage and wastewater will be to existing mains. No emissions are predicted that will impact upon any Natura 2000 site.
excavation requirements;	No excavations will take place within any Natura 2000 Site. Construction works will be entirely within area as identified in this reporting.
Transportation requirements;	Site has existing access via a regional road (R114) and adjacent local road. No other means of access will be required during any phase of the project.
Duration of construction, operation, decommissioning, etc.;	Duration of works not known at time of writing. However, these works are expected to be completed within 12-24 months.
Timing of works	Works shall be timed to minimise disturbance to native species. No woody vegetation is to be cleared or otherwise impacted upon during the bird nesting season (March-August inclusive).
Cumulative or In-combination Impacts with other Projects and Plans	A number of other projects have been considered as part of the screening process. A search of South Dublin Country Councils planning web portal was carried out as part of this desktop study. A number of planning applications were reviewed; the greater majority of these related to the construction, demolition or alteration of private dwellings, commercial or residential developments. It was noted that an apartment development (SD15A/0336) for adjacent lands was refused in 2015. A more recent social housing development (SD18B/0002) was approved for nearby lands. A current application (SD20A/0140) is at further information stage for the agricultural lands adjacent the Firhouse Inn site. This is for the development of 2 no. grass playing pitches and associated club facilities. No cumulative or in-combination impacts are therefore predicted.

3.2 Description of any Likely Changes to the Natura 2000 Sites

Any likely changes to the Natura 2000 site are described in the table below with reference to the following criteria: reduction of habitat area, disturbance to key species, habitat or species fragmentation, reduction in species density, changes in key indicators of conservation value and climate change.

Table 5: Likely changes to the Nature 2000 site

Likely Changes to the Natura 2000 Site	
Reduction of habitat area	No works will take place within the boundary of any Natura 2000 sites. There will be no loss of habitat within any Natura 2000 site as a result of the proposed development.
Disturbance to key species	All works associated with the proposed development will take place outside the boundaries of the Natura 2000 sites. None of the qualifying interests of the nearest Natura 2000 sites were recorded during survey. No loss of or impacts upon habitats of the qualifying interests of the nearest Natura 2000 site is predicted. No significant impacts on any key species have therefore been considered likely.
Habitat or species fragmentation	There will be no works within any SAC or SPA. No impacts on any qualifying species are predicted. Therefore, there will be no impact within any Natura 2000 sites with regard to habitat or species fragmentation.
Reduction in species density	No reduction in species density is considered likely within any SAC or SPA as a result of the proposed works.
Changes in key indicators of conservation value (water quality etc.);	Habitat integrity is the most relevant of the key indicators of conservation value with regard to the nearest Natura 2000 site. However, the risk of any significant impacts on Habitat integrity within this site during the construction phase can be excluded due to nature of the works and absence of any direct connectivity with the development. There will be no impacts on any habitat areas outside the site.
Climate change	No damage to any Natura 2000 site as a result of or in combination with enhanced climate change is predicted as a result of the proposed development.

3.2.1 Likelihood of Interference with the key relationships that define the structure and function of the Natura 2000 Site as a whole:

It is not considered likely that the proposed development will interfere with any of the key relationships of any Natura 2000 site. It is considered that there will be no long term residual impacts from the proposed works upon the key relationships that define any Natura 2000 sites.

3.2.2 Indicators of Significance as a Result of the Identification of Effects

Indicators of significance as a result of the identification of effects as set out below in terms of loss, fragmentation, disruption, disturbance and changes to the key elements of site.

Table 6: Indicators of significance

Indicators of Significance	
Loss	There will be no loss of habitat within any Natura 2000 site as a result of the proposed works. It is not anticipated that the loss of any species of conservation interest will occur as a result of the proposed works due to injury or mortality.
Fragmentation	No habitat fragmentation to any Natura 2000 site is predicted.
Disruption	No significant risk of disruption to any Natura 2000 sites are likely during this project.
Disturbance	As above
change to key elements of the site (e.g. water quality etc.)	No changes to any key elements of any Natura 2000 site are predicted as a result of the proposed development.

Description of any Likely Significant Impacts or Indeterminate Impacts of the Project on the Natura 2000 Site

Based on a consideration of the likely impacts arising from the proposed works and a review of their significance in terms of the conservation interests and objectives of the Natura 2000 Sites screened, no significant impacts have been identified on the Natura 2000 sites as a result of the proposed development.

3.3 FINDINGS OF ARTICLE 6(3) SCREENING ASSESSMENT

Name of project or plan: Strategic Housing Development on lands located at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24

Name and location of Natura 2000 Site: Works will take place on the Firhouse Road Dublin 24. The nearest designated site is Glenasmole Valley SAC 3.9km removed from the proposed site of works.

Description of project or plan: The development will consist of the demolition of all existing structures on site (c. 1,326 sq m), including:

- Two storey building formally used as public house, ancillary off-licence and associated structures (c. 972 sq m);
- Two storey building comprising an existing barber shop and betting office (c. 260 sq m);
- Single storey cottage building and associated structures (c. 94 sq m); and
- Eastern boundary wall and gated entrance from Mount Carmel Park.

The development with a total gross floor area of c. 11,638 sq m, will also consist of 100 no. residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height, over lower ground floor and basement levels, comprising:

- 96 no. apartments (consisting of 2 no. studio units; 45 no. one bedroom units; 10 no. two bedroom (3 person) units; 34 no. two bedroom (4 person) units; and 5 no. three bedroom units), together with private (balconies and private terraces) and communal amenity open space provision at podium and roof levels; and
- 4 no. duplex apartments (consisting of 2 no. one bedroom units and 2 no. two bedroom units (4 person) located within Block B01, together with private balconies and terraces.

The development will also consist of non-residential uses (c. 355 sq m), including:

- 1 no. café (c. 58 sq m) and 1 no. office (c. 30 sq m) located at ground floor level of Block B01;
- 1 no. medical unit (c. 59 sq m) and 1 no. betting office (c. 66 sq m) located at ground floor level of Block B02;
- 1 no barber shop (c. 28 sq m) located at ground floor level between Blocks 01 and 02; and
- 1 no. crèche (c. 114 sq m) located at lower ground floor level of Block B01 and associated outdoor play area to the rear.

Vehicular access to the site will be from the existing access off Firhouse Road. The proposal includes minor alterations to the existing access, including the provision of new and enhanced pedestrian infrastructure.

The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, basement car parking (80 no. spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and Mount Carmel Park); ducting; plant; waste management provision; SuDS measures; stormwater management and attenuation; sustainability measures; signage; changes in levels; public lighting; and all ancillary site development and excavation works above and below ground.

Is the project or plan directly connected with or necessary to the management of the site?: The project is not directly connected with or necessary to the management of any Natura 2000 sites.

Are there other projects or plans that together with the project or plan being assessed could affect the site (provide details)? On the basis that the proposed project will have no impacts on any Natura 2000 sites, no cumulative or in combination impacts are predicted.

3.3.1 Assessment of Significance of Effects

Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site:

The proposed project will not significantly affect any Natura 2000 sites.

Explain why these effects are not considered significant

There will be no direct impacts upon the Natura 2000 Sites as:

- No works will take place within any Natura 2000 Site.
- No resources of any Natura 2000 site will be affected by works. There will be no indirect impacts upon the Natura 2000 Sites as:
 - The project is small in scale and limited in duration.
 - There is no direct hydrological connectivity between the site and designated sites.

Indirect impacts upon the Natura 2000 Site:

- None.

Consultation with Agencies

- Consultation with the client to establish the requirement for this report.

3.4 Data collected to carry out the assessment

The following sources of data were employed:

- Environmental Protection Agency Database
- NPWS protected species database and online mapping
- Historical OSI Maps
- NPWS protected species database and online mapping.
- South Dublin County Council Planning Database

Level of assessment completed

- Desk Study
- Site visits and surveys between September 2020 and May 2022
- JNCC Phase 1 Habitat Assessment
- Fossitt Level III Habitat Recording
- Dedicated Bat Surveys (including building searches and emergence watches)
- Dedicated Bird nesting activity surveys
- Dedicated surveys for invasive species.

Overall Conclusions

In view of the best and objective scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed development as described here, individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any of the European sites. Therefore, it is recommended to An Bord Pleanála that Appropriate Assessment is not required.

4 References

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Appendix 1: Site Photos

Fig. 1. The existing Firhouse Inn



Fig. 2. View of Firhouse Inn and car park and R114 extending westward toward M50.



Fig. 3. Mature Beech trees to the north of the existing Firhouse Inn car park



Fig. 4. Agricultural grassland and dividing treelines to the northwest of the site

