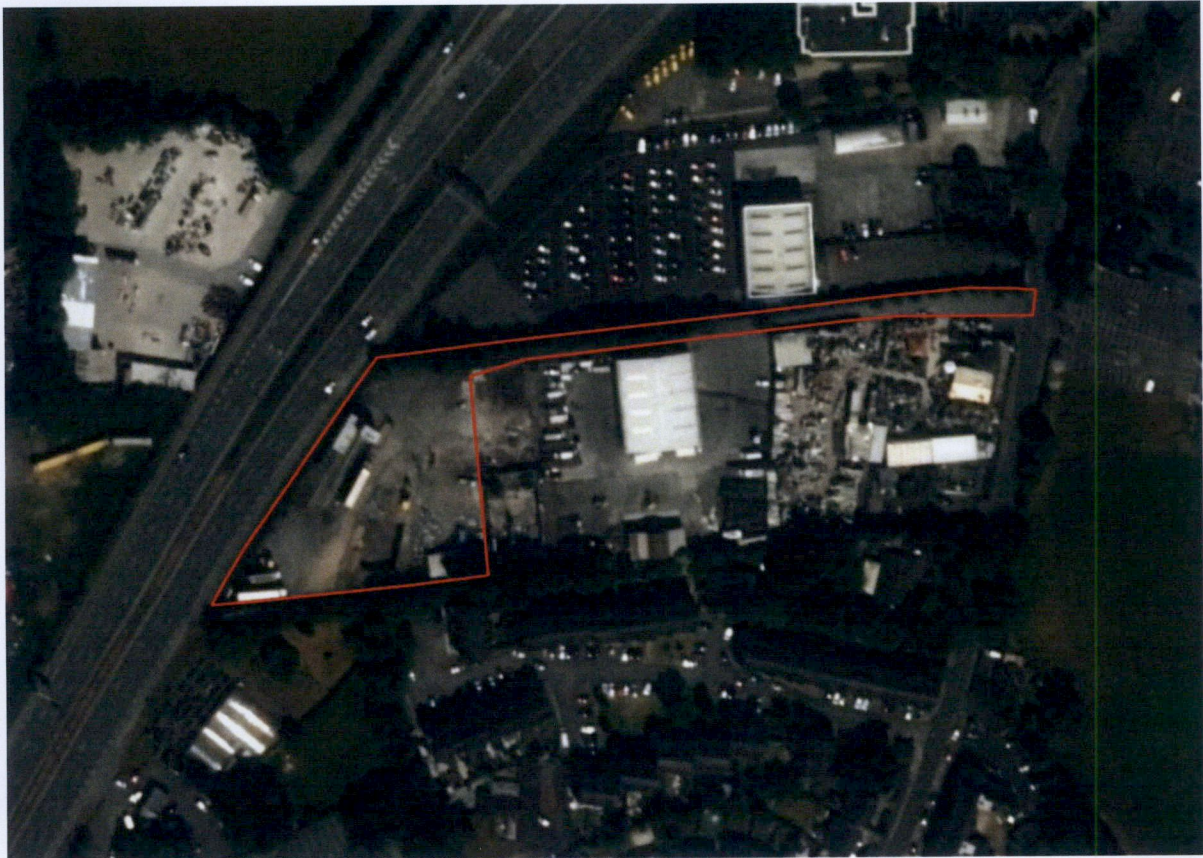


# ALTEMAR

Marine & Environmental Consultancy

Appropriate Assessment Screening for a Proposed Truck Wash on lands at Kingswood, Old Naas Road, Kingswood Cross, Dublin 22.



21<sup>st</sup> October 2022

**Prepared by:** Bryan Deegan (MCIEEM) of Altemar Ltd.

**On behalf of:** Bradawl Ltd.

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### Document Control Sheet

|          |   |            |                               |
|----------|---|------------|-------------------------------|
| Project  | Appropriate Assessment Screening for a proposed truck was on lands at Kingswood, Old Naas Road, Kingswood Cross, Dublin 22. |            |                               |
| Report   | Appropriate Assessment Screening  |            |                               |
| Date     | 21 <sup>st</sup> October 2022   |            |                               |
| Version  | Author  | Reviewed   | Date                          |
| Draft 01 | Bryan Deegan  | Jack Doyle | 20 <sup>th</sup> October 2022 |
| Planning | Bryan Deegan  |            | 21 <sup>st</sup> October 2022 |



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## Introduction

An Appropriate Assessment is an assessment of the potential effects of a proposed project or plan, on its own, or in combination with other plans or projects, on one or more European sites (Special Areas of Conservation (SAC) or Special Protection Areas (SPA)).

The following Appropriate Assessment (AA) (Screening Stage) has been prepared by **Altemar Ltd.** at the request of Bradawl Ltd. The project relates to an application for planning permission for a truck wash was on lands at Kingswood, Old Naas Road, Kingswood Cross, Dublin 22.

The AA Screening stage examines the likely significant effects of the proposed development, either on its own, or in combination with other plans and projects, upon a European site and considers whether, on the basis of objective scientific evidence, it can be concluded, in view of best scientific knowledge and the conservation objectives of the relevant European sites, that there are not likely to be significant effects on any European site.

### Altemar Ltd.

Since its inception in 2001, Altemar has been delivering ecological and environmental services to a broad range of clients. Operational areas include residential, infrastructural, renewable, oil & gas, private industry, local authorities, EC projects and State/semi-State Departments. Bryan Deegan is the managing director of Altemar. Bryan is an environmental scientist and marine biologist with 27 years' experience working in Irish terrestrial and aquatic environments, providing services to the State, Semi-State and industry. Bryan Deegan (MCIEEM) holds a MSc in Environmental Science, BSc (Hons.) in Applied Marine Biology, NCEA National Diploma in Applied Aquatic Science and a NCEA National Certificate in Science (Aquaculture). Bryan Deegan carried out all elements of this Appropriate Assessment Screening.

## Background to the Appropriate Assessment

The Habitats Directive 92/43/EEC (together with the Birds Directive (2009/1477/EC)) forms the cornerstone of Europe's nature conservation policy. The Directive protects over 1000 animals and plant species and over 200 "habitat types" which are of European importance. In the Habitats Directive, Articles 3 to 9 provide the legislative means to protect habitats and species of European Community interest through the establishment and conservation of an EU-wide network of conservation sites (NATURA, 2000). These are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive), Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European 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 [EUROPEAN] site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the component 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."*

As outlined in "Managing European sites, The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" (European Commission, 21 November 2018) *"The purpose of the appropriate assessment is to assess the implications of the plan or project in respect of the site's conservation objectives, either individually or in combination with other plans or projects. The conclusions should enable the competent authorities to ascertain whether the plan or project will adversely affect the integrity of the site concerned. The focus of the appropriate assessment is therefore specifically on the species and/or the habitats for which the European site is designated."*



As outlined in the EC guidance document on Article 6(4) (January 2007)<sup>1</sup>:

*“Appropriate assessments of the implications of the plan or project for the site concerned must precede its approval and take into account the cumulative effects which result from the combination of that plan or project with other plans or projects in view of the site's conservation objectives. This implies that all aspects of the plan or project which can, either individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.*

*Assessment procedures of plans or projects likely to affect European sites should guarantee full consideration of all elements contributing to the site integrity and to the overall coherence of the network, both in the definition of the baseline conditions and in the stages leading to identification of potential impacts, mitigation measures and residual impacts. These determine what has to be compensated, both in quality and quantity. Regardless of whether the provisions of Article 6(3) are delivered following existing environmental impact assessment procedures or other specific methods, it must be ensured that:*

- *Article 6(3) assessment results allow full traceability of the decisions eventually made, including the selection of alternatives and any imperative reasons of overriding public interest.*
- *The assessment should include all elements contributing to the site's integrity and to the overall coherence of the network as defined in the site's conservation objectives and Standard Data Form, and be based on best available scientific knowledge in the field. The information required should be updated and could include the following issues:*
  - *Structure and function, and the respective role of the site's ecological assets;*
  - *Area, representativity and conservation status of the priority and nonpriority habitats in the site;*
  - *Population size, degree of isolation, ecotype, genetic pool, age class structure, and conservation status of species under Annex II of the Habitats Directive or Annex I of the Birds Directive present in the site;*
  - *Role of the site within the biographical region and in the coherence of the European network; and,*
  - *Any other ecological assets and functions identified in the site.*
- *It should include a comprehensive identification of all the potential impacts of the plan or project likely to be significant on the site, taking into account cumulative impacts and other impacts likely to arise as a result of the combined action of the plan or project under assessment and other plans or projects.*
- *The assessment under Article 6(3) applies the best available techniques and methods, to estimate the extent of the effects of the plan or project on the biological integrity of the site(s) likely to be damaged.*
- *The assessment provides for the incorporation of the most effective mitigation measures into the plan or project concerned, in order to avoid, reduce or even cancel the negative impacts on the site.*
- *The characterisation of the biological integrity and the impact assessment should be based on the best possible indicators specific to the European assets which must also be useful to monitor the plan or project implementation.”*

## Stages of the Appropriate Assessment

This Appropriate Assessment screening was undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2001), Part XAB of the Planning and Development Act 2000, as amended, in addition to the December 2009 publication from the Department of Environment, Heritage and Local Government; 'Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities' and the

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<sup>1</sup> European Commission. (2007). Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission;



European Communities (Birds and Natural Habitats) Regulations 2011. In order to comply with the above Guidelines and legislation, the Appropriate Assessment process must be structured as follows:

1) Screening stage:

- Description of plan or project, and local site or plan area characteristics;
- Identification of relevant European sites, and compilation of information on their qualifying interests and conservation objectives
- Identification and description of individual in combination effects likely to result from the proposed project;
- Assessment of the likely significance of the effects identified above. Exclusion of sites where it can be objectively concluded that there will be no likely significant effects; and, Conclusions

2) Appropriate Assessment (Natura Impact Statement):

- Description of the European sites that will be considered further;
- Identification and description of potential adverse impacts on the conservation objectives of these sites likely to occur from the project or plan; and,
- Mitigation Measures that will be implemented to avoid, reduce or remedy any such potential adverse impacts
- Assessment as to whether, following the implementation of the proposed mitigation measures, it can be concluded, beyond all reasonable scientific doubt, that there will be no adverse impact on the integrity of the relevant European Site in light of its conservation objectives"
- Conclusions.

If it can be demonstrated during the AA screening phase (Stage 1), that the proposed project will not have a significant effect, whether alone or in combination with other plans or projects, on the conservation objectives of a European site, then no further AA (Stage 2) will be required. It is important to note that there is a requirement to apply a precautionary approach to AA screening. Therefore, where effects are possible, certain or unknown at the screening stage, AA will be required.

In addition, it should be noted that Article 6(3) of the Habitats Directive must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an AA of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.



# Stage 1 Screening Assessment

## Description of the Proposed Project

This Appropriate Assessment Screening Report has been prepared at the request of South Dublin County Council as per requested Item 11 of a Request for Further Information (RFI) dated 21/07/2022 in relation to Planning Register Reference SD22A/0150.

The proposed project consists of the relocation of 3 fuel pumps and the reconfiguration of permitted fuel islands from 1 long fuel island and 1 small fuel island to now provide for 3 small fuel islands, demolition/removal of single storey building along southern boundary and 1 new truck wash to south-western boundary of site; Planning permission is sought to remove 1 existing truck wash along the western boundary, demolition/removal of existing storage building to the western boundary and alterations to internal road layout to include directional arrows.

Specifically, in relation to Appropriate Assessment South Dublin County Council has requested the following in the RFI :

*'11. Screening for Appropriate Assessment.*

*The applicant has not provided information regarding screening for appropriate assessment, nor have drainage layout or SUDs details been provided. Irish Water maps show that a nearby surface water pipe leads directly into the Camac River, providing a direct hydrological connection with Dublin Bay. Given the nature of the proposed operations on the site and the potential for pollutants to be diverted into the Camac River, the applicant should provide a screening report for Appropriate Assessment as part of additional information.'*

The proposed site outline, location, layout plan, and sections are demonstrated in Figures 1-4.

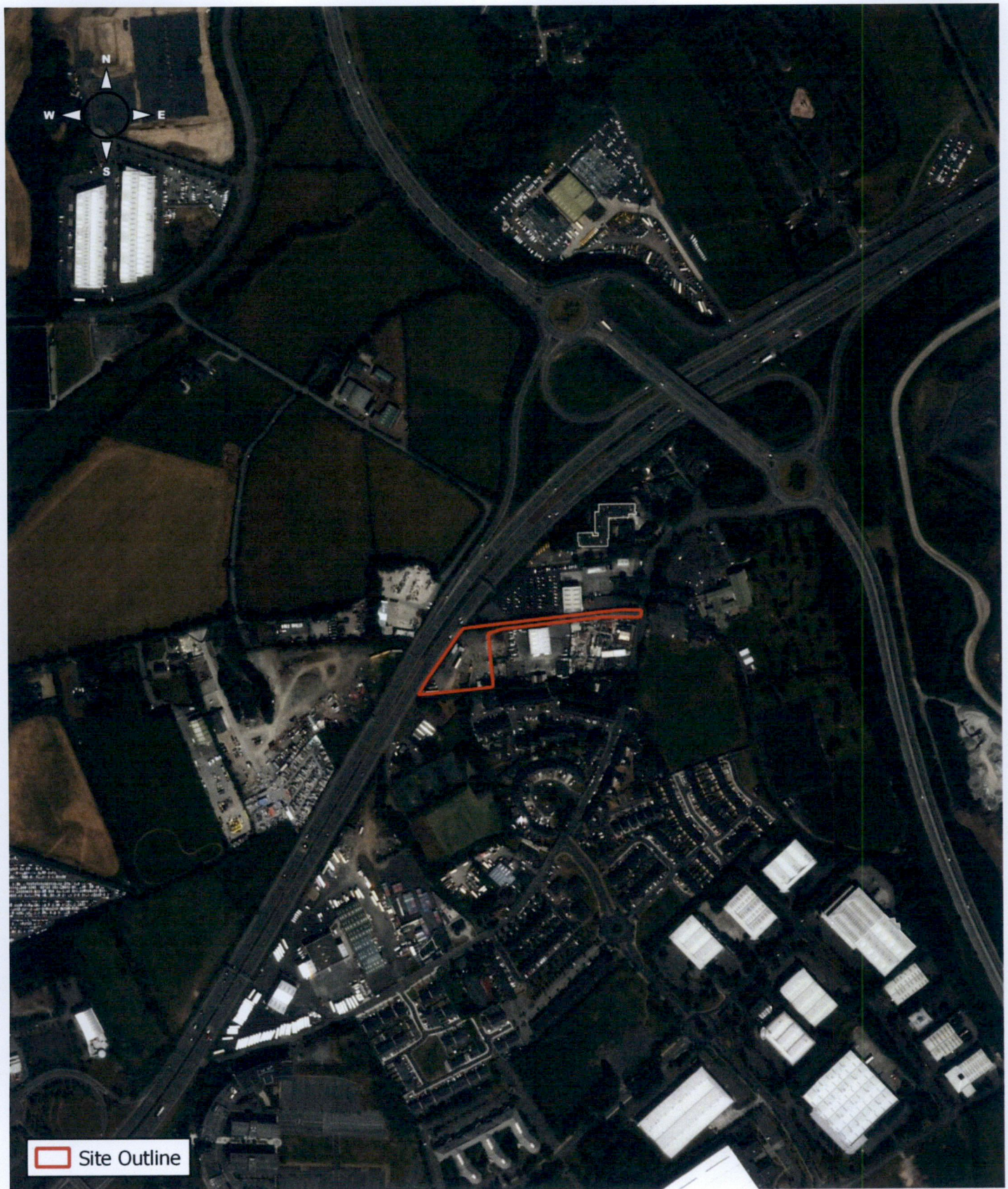
## Landscape

The proposed landscape strategy for the subject site has been prepared by Jane McCorkell Design. The proposed landscape masterplan is demonstrated in Figure 5.

## Drainage

The drainage strategy for the proposed development has been prepared by Tent Engineering to accompany this planning application. The proposed drainage infrastructure layout is demonstrated in Figure 6.





0 250 500 750 m

Project: Kingswood Truck Wash  
 Location: Kingswood, Dublin 22  
 Date: 20th October 2022  
 Drawn By: Bryan Deegan (Altamar)

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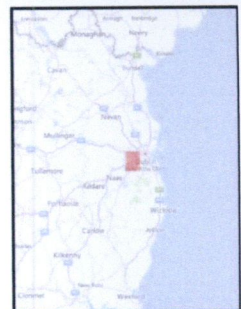
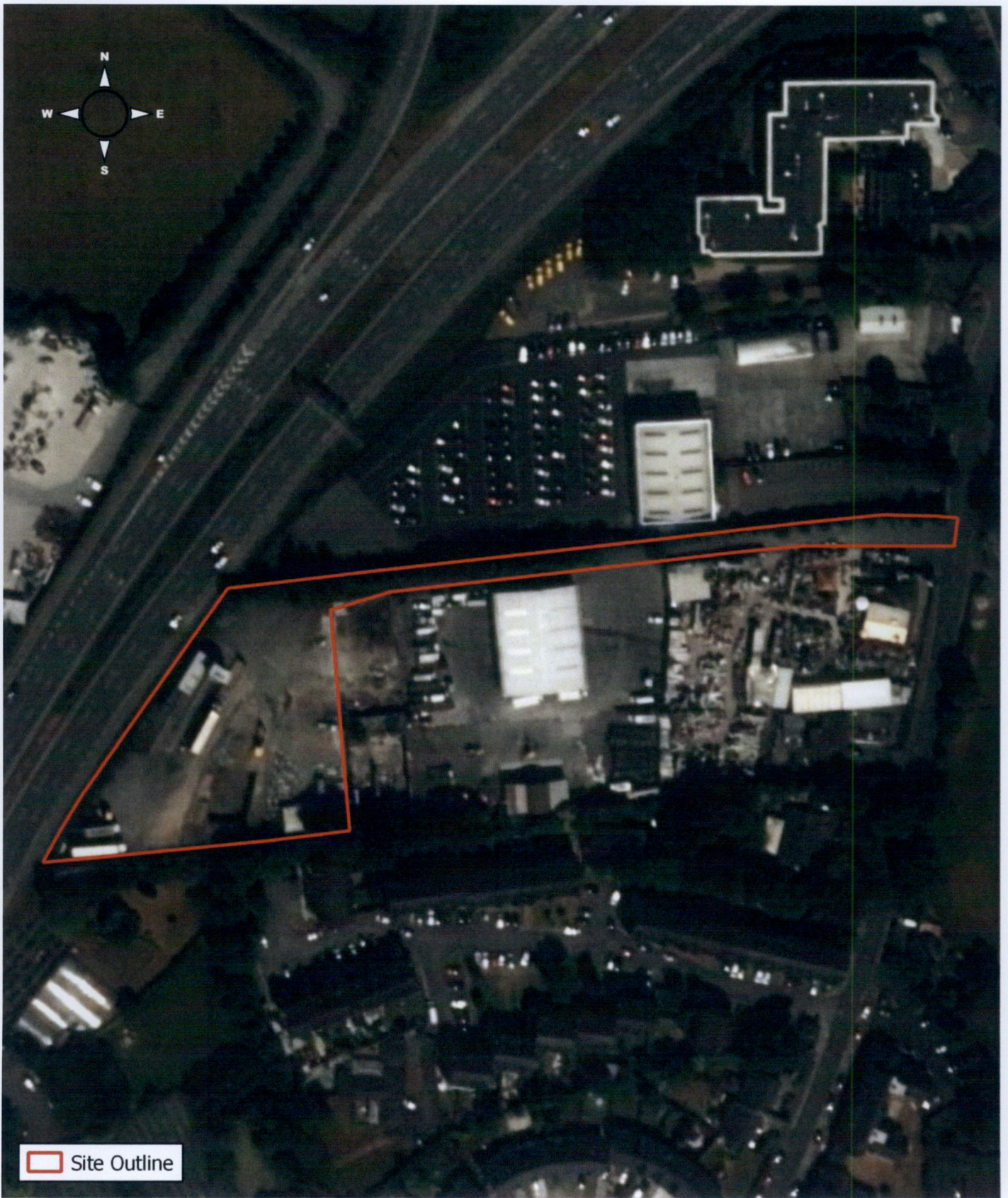


Figure 1. Site outline and location





Site Outline

0 50 100 150 m

Project: Kingswood Truck Wash  
Location: Kingswood, Dublin 22  
Date: 20th October 2022  
Drawn By: Bryan Deegan (Altamar)

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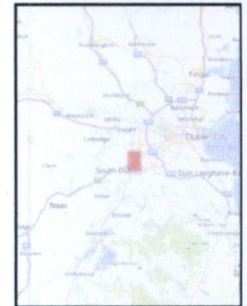
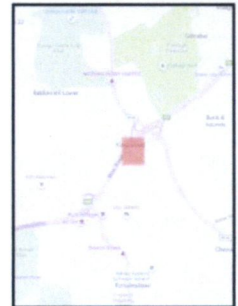


Figure 2. Outline of proposed site.





Figure 3. Site layout plan















## Identification of Relevant Natura 2000 Sites

The proposed development site is not within a European site. As outlined in Office of the Planning Regulator (2021) *“The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source- Pathway-Receptor framework and not by arbitrary distances (such as 15 km).”*

A key factor in the consideration as to whether or not a particular European site is likely to be affected by the proposed development is its distance from the development location. It is generally, but not necessarily, the case that the greater the distance from the plan or project the smaller the likelihood of impacts. In this case, the nearest European site to the proposed development is 5.6 km away (Glenasmole Valley SAC).

After attenuation on site, surface water drainage that cannot percolate into the permeable paving/groundwater SuDs measures e.g. tree pits on site will be directed to a bypass separator, attenuation tank and existing storm water sewer located to the south of the subject site. This network outfalls to the River Camac, a watercourse located 50m from the subject site, which in turn outfalls to the River Liffey and ultimately enters the marine environment at Dublin Bay. As a result, there is an indirect hydrological connection to designated European Sites located within Dublin Bay. Specifically, South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, and North Bull Island SPA are downstream of the River Camac.

In the interest of carrying out a thorough assessment in line with both the Habitats Directive, and the precautionary principle, the ZOI was expanded for this assessment to include designated sites within 15km of the proposed development site, and sites beyond 15km with the potential for a hydrological connection. This was done in the interest of ensuring that any pathways, however indirect or remote, were taken into account. All Natura 2000 sites within 15km, and beyond 15km with a potential hydrological pathway, are listed in Table 1. The qualifying interests, and the potential impact of the development on each European site and qualifying interest, are screened out in Table 2. SPA's and SAC's within 15km are seen in Figures 7 & 8. Watercourses, SACs, and SPAs proximate to the subject site are demonstrated in Figures 9 - 11.

Table 1. Proximity to designated sites of conservation importance

| NATURA 2000 Site                             | Distance |
|--|----------|
| <b>Special Areas of Conservation</b>         |          |
| Glenasmole Valley SAC                        | 5.6 Km   |
| Wicklow Mountains SAC                        | 7.4 Km   |
| Rye Water Valley/Carton SAC                  | 8.3 Km   |
| Red Bog, Kildare SAC                         | 13.4 Km  |
| South Dublin Bay SAC                         | 14.2 Km  |
| North Dublin Bay SAC                         | 17.1 km  |
| <b>Special Protection Areas</b>              |          |
| Wicklow Mountains SPA                        | 10.4 Km  |
| Poulaphouca Reservoir SPA                    | 13.7 Km  |
| South Dublin Bay and River Tolka Estuary SPA | 14.2 Km  |
| North Bull Island SPA                        | 17.1 km  |



Table 2. Screening of NATURA 2000 sites within 15km and NATURA 2000 sites within 15km with potential of hydrological connection to the proposed development

| NATURA Code | Name                  | Screened IN/OUT | Details/Reason  |
|-------------|-----------------------|-----------------|---|
| IE0001209   | Glenasmole Valley SAC | OUT             | <p><b>Conservation Objectives</b><br/>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.</p> <p><b>Qualifying Interests</b><br/>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]<br/>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]<br/>Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]</p> <p><b>Potential Impact</b><br/>The proposed development site is located within an industrial environment at a minimum distance of 5.6 km from the Glenasmole SAC (Figure 7). There is no direct or indirect hydrological pathway from the proposed development site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. No potential impact is foreseen.</p> <p><b>No significant effects likely</b></p>  |
| IE0002122   | Wicklow Mountains SAC | OUT             | <p><b>Conservation Objectives:</b><br/>The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Qualifying Interests</b><br/>Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]<br/>Natural dystrophic lakes and ponds [3160]<br/>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]<br/>European dry heaths [4030]<br/>Alpine and Boreal heaths [4060]<br/>Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]<br/>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]<br/>Blanket bogs (* if active bog) [7130]<br/>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]<br/>Calcareous rocky slopes with chasmophytic vegetation [8210]<br/>Siliceous rocky slopes with chasmophytic vegetation [8220]<br/>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]<br/>Otter (<i>Lutra lutra</i>) [1355]</p> <p><b>Potential Impact</b><br/>The proposed development site is located within an industrial environment at a minimum distance of 7.4 km from the Wicklow Mountains SAC (Figure 7). There is no direct or indirect</p> |



| NATURA Code | Name                        | Screened IN/OUT | Details/Reason  |
|-------------|-----------------------------|-----------------|---|
|             |                             |                 | <p>hydrological pathway from the proposed development site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. No potential impact is foreseen.</p> <p><b>No significant effects likely</b></p>   |
| IE0001398   | Rye Water Valley/Carton SAC | <b>OUT</b>      | <p><b>Conservation Objectives:</b><br/>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.</p> <p><b>Qualifying Interests</b><br/>Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]<br/>Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>) [1014]<br/>Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>) [1016]</p> <p><b>Potential Impact</b><br/>The proposed development site is located within an industrial environment at a minimum distance of 8.3 km from this SAC (Figure 7). No potential impact is foreseen. There is no direct or indirect hydrological pathway from the proposed development site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p> |
| IE0000397   | Red Bog, Kildare SAC        | <b>OUT</b>      | <p><b>Conservation Objectives:</b><br/>The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Qualifying Interests</b><br/>Transition mires and quaking bogs [7140]</p> <p><b>Potential Impact</b><br/>The proposed development site is located within an industrial environment at a minimum distance of 13.4 km from this SAC (Figure 7). No potential impact is foreseen. There is no direct or indirect hydrological pathway from the proposed development site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p>  |
| IE0001398   | South Dublin Bay SAC        | <b>OUT</b>      | <p><b>Conservation Objectives</b><br/>The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Qualifying Interests</b><br/>Mudflats and sandflats not covered by seawater at low tide [1140]<br/>Annual vegetation of drift lines [1210]<br/>Salicornia and other annuals colonising mud and sand [1310]</p>  |



| NATURA Code | Name                 | Screened IN/OUT | Details/Reason   |
|-------------|----------------------|-----------------|--|
|             |                      |                 | <p>Embryonic shifting dunes [2110]</p> <p><b>Potential Impact</b></p> <p>The proposed development site is located within an industrial environment at a minimum distance of 14.2 km from this SAC (Figure 7).</p> <p>There is an indirect hydrological pathway to this SAC via surface water drainage. After attenuation onsite, any surface water drainage that cannot percolate into the proposed SuDS features onsite will be directed to an existing storm water network located to the south of the site. This existing network outfalls to the River Camac, a watercourse located 50m from the subject site that outfalls to the River Liffey, and ultimately the marine environment at Dublin Bay. As a result, there is an indirect hydrological pathway to this SAC. However, given the scale of the proposed development, and the minimum distance to this SAC (14.2 km) across a substantial watercourse network and estuarine and marine environment, it is considered that, in the absence of mitigation (including the design features of the proposed development), any silt or pollutants will settle, be dispersed, or diluted within the extensive hydrological network and will not impact on this SAC. No significant effects on the qualifying interests of this SAC are likely. The indirect hydrological pathway of surface water will not result in a significant effect on the Natura 2000 site.</p> <p>It should be noted that the construction and operation of the proposed development will have to comply with Water Pollution Acts. However, the measures to comply with Water Pollutions Acts are not necessary for the protection of Natura 2000 sites.</p> <p>No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p> |
| IE000206    | North Dublin Bay SAC | OUT             | <p><b>Conservation Objectives</b></p> <p>The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Qualifying Interests</b></p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Humid dune slacks [2190]</p>  |



| NATURA Code                     | Name                  | Screened IN/OUT | Details/Reason   |
|---------------------------------|-----------------------|-----------------|--|
|                                 |                       |                 | <p><i>Petalophyllum ralfsii</i> (Petalwort) [1395]</p> <p><b>Potential Impact</b><br/> The proposed development site is located within an industrial environment at a minimum distance of 17.1 km from this SAC (Figure 7).</p> <p>There is an indirect hydrological pathway to this SAC via surface water drainage. After attenuation onsite, any surface water drainage that cannot percolate into the proposed SuDS features onsite will be directed to an existing storm water network located to the south of the site. This existing network outfalls to the River Camac, a watercourse located 50m from the subject site that outfalls to the River Liffey, and ultimately the marine environment at Dublin Bay. As a result, there is an indirect hydrological pathway to this SAC. However, given the scale of the proposed development, and the minimum distance to this SAC (17.1 km) across a substantial watercourse network and estuarine and marine environment, it is considered that, in the absence of mitigation (including the design features of the proposed development), any silt or pollutants will settle, be dispersed, or diluted within the extensive hydrological network and will not impact on this SAC. No significant effects on the qualifying interests of this SAC are likely. The indirect hydrological pathway of surface water will not result in a significant effect on the Natura 2000 site.</p> <p>It should be noted that the construction and operation of the proposed development will have to comply with Water Pollution Acts. However, the measures to comply with Water Pollutions Acts are not necessary for the protection of Natura 2000 sites.</p> <p>No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p> |
| <b>Special Protection Areas</b> |                       |                 |  |
| IE0004040                       | Wicklow Mountains SPA | <b>OUT</b>      | <p><b>Conservation Objectives:</b><br/> To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p> <p><b>Qualifying Interests</b><br/> Merlin (<i>Falco columbarius</i>) [A098]<br/> Peregrine (<i>Falco peregrinus</i>) [A103]</p> <p><b>Potential Impact</b><br/> The proposed development site is located within an industrial environment at a minimum distance of 10.4 km from the Wicklow Mountains SPA (Figure 8). There is no direct or indirect hydrological pathway from the proposed development site to the SPA.</p> <p>Given the minimum distance to this SPA (10.4 km) across a densely populated and industrial environment, no significant noise or vibration impacts on the qualifying interests of this SPA are likely. Further, given that the subject site is a brownfield site located within an industrial environment, the subject site is not</p>   |



| NATURA Code | Name   | Screened IN/OUT | Details/Reason  |
|-------------|--|-----------------|---|
|             |  |                 | <p>an important foraging or roosting area for these species. The construction and operation of the proposed development will not impact on the conservation interests of the site. No potential impact is foreseen.</p> <p><b>No significant effects are likely</b></p>   |
| IE0004063   | Poulaphouca Reservoir SPA                    | <b>OUT</b>      | <p><b>Conservation Objective:</b><br/>To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p> <p><b>Qualifying Interests</b><br/>Greylag Goose (<i>Anser anser</i>) [A043]<br/>Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]</p> <p><b>Potential Impact</b><br/>The proposed development site is located within an industrial environment at a minimum distance of 13.7 km from the Poulaphouca Reservoir SPA (Figure 8). There is no direct or indirect hydrological pathway from the proposed development site to the SPA.</p> <p>Given the minimum distance to this SPA (13.7 km) across a densely populated and industrial environment, no significant noise or vibration impacts on the qualifying interests of this SPA are likely. Further, given that the subject site is a brownfield site located within an industrial environment, the subject site is not an important foraging or roosting area for these species.</p> <p>The construction and operation of the proposed development will not impact on the conservation interests of the site. No potential impact is foreseen.</p> <p><b>No significant effects are likely</b></p> |
| IE004024    | South Dublin Bay and River Tolka Estuary SPA | <b>OUT</b>      | <p><b>Conservation Objectives</b><br/>The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Features of Interest</b><br/>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]<br/>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]<br/>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]<br/>Grey Plover (<i>Pluvialis squatarola</i>) [A141]<br/>Knot (<i>Calidris canutus</i>) [A143]<br/>Sanderling (<i>Calidris alba</i>) [A144]<br/>Dunlin (<i>Calidris alpina</i>) [A149]<br/>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]<br/>Redshank (<i>Tringa totanus</i>) [A162]<br/>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]<br/>Roseate Tern (<i>Sterna dougallii</i>) [A192]<br/>Common Tern (<i>Sterna hirundo</i>) [A193]<br/>Arctic Tern (<i>Sterna paradisaea</i>) [A194]<br/>Wetland and Waterbirds [A999]</p>   |



| NATURA Code | Name                  | Screened IN/OUT | Details/Reason  |
|-------------|-----------------------|-----------------|---|
|             |                       |                 | <p><b>Potential Impact</b></p> <p>The proposed development site is located within an industrial environment at a minimum distance of 14.2 km from this SPA (Figure 8).</p> <p>There is an indirect hydrological pathway to this SPA via surface water drainage. After attenuation onsite, any surface water drainage that cannot percolate into the proposed SuDS features onsite will be directed to an existing storm water network located to the south of the site. This existing network outfalls to the River Camac, a watercourse located 50m from the subject site that outfalls to the River Liffey, and ultimately the marine environment at Dublin Bay. As a result, there is an indirect hydrological pathway to this SPA. However, given the scale of the proposed development, and the minimum distance to this SPA (14.2 km) across a substantial watercourse network and estuarine and marine environment, it is considered that, in the absence of mitigation (including the design features of the proposed development), any silt or pollutants will settle, be dispersed, or diluted within the extensive hydrological network and will not impact on this SPA. No significant effects on the qualifying interests of this SPA are likely. The indirect hydrological pathway of surface water will not result in a significant effect on the Natura 2000 site.</p> <p>Given the minimum distance to this SPA (14.2 km) across a densely populated and industrial environment, no significant noise or vibration impacts on the qualifying interests of this SPA are likely. Further, given that the subject site is a brownfield site located within an industrial environment, the subject site is not an important foraging or roosting area for these species.</p> <p>No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p> |
| IE004006    | North Bull Island SPA | <b>OUT</b>      | <p><b>Conservation Objectives</b></p> <p>The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Qualifying Interests</b></p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]<br/> Shelduck (<i>Tadorna tadorna</i>) [A048]<br/> Teal (<i>Anas crecca</i>) [A052]<br/> Pintail (<i>Anas acuta</i>) [A054]<br/> Shoveler (<i>Anas clypeata</i>) [A056]<br/> Oystercatcher (<i>Haematopus ostralegus</i>) [A130]<br/> Golden Plover (<i>Pluvialis apricaria</i>) [A140]<br/> Grey Plover (<i>Pluvialis squatarola</i>) [A141]<br/> Knot (<i>Calidris canutus</i>) [A143]<br/> Sanderling (<i>Calidris alba</i>) [A144]<br/> Dunlin (<i>Calidris alpina</i>) [A149]<br/> Black-tailed Godwit (<i>Limosa limosa</i>) [A156]<br/> Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p>  |



| NATURA Code | Name | Screened IN/OUT | Details/Reason  |
|-------------|------|-----------------|---|
|             |      |                 | <p data-bbox="702 143 1350 315">Curlew (<i>Numenius arquata</i>) [A160]<br/> Redshank (<i>Tringa totanus</i>) [A162]<br/> Turnstone (<i>Arenaria interpres</i>) [A169]<br/> Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]<br/> Wetland and Waterbirds [A999]</p> <p data-bbox="702 344 906 376"><b>Potential Impact</b></p> <p data-bbox="702 383 1464 488">The proposed development site is located within an industrial environment at a minimum distance of 17.1 km from this SPA (Figure 8).</p> <p data-bbox="702 506 1464 1182">There is an indirect hydrological pathway to this SPA via surface water drainage. After attenuation onsite, any surface water drainage that cannot percolate into the proposed SuDS features onsite will be directed to an existing storm water network located to the south of the site. This existing network outfalls to the River Camac, a watercourse located 50m from the subject site that outfalls to the River Liffey, and ultimately the marine environment at Dublin Bay. As a result, there is an indirect hydrological pathway to this SPA. However, given the scale of the proposed development, and the minimum distance to this SPA (17.1 km) across a substantial watercourse network and estuarine and marine environment, it is considered that, in the absence of mitigation (including the design features of the proposed development), any silt or pollutants will settle, be dispersed, or diluted within the extensive hydrological network and will not impact on this SPA. No significant effects on the qualifying interests of this SPA are likely. The indirect hydrological pathway of surface water will not result in a significant effect on the Natura 2000 site.</p> <p data-bbox="702 1200 1464 1413">Given the minimum distance to this SPA (17.1 km) across a densely populated and industrial environment, no significant noise or vibration impacts on the qualifying interests of this SPA are likely. Further, given that the subject site is a brownfield site located within an industrial environment, the subject site is not an important foraging or roosting area for these species.</p> <p data-bbox="702 1431 1464 1536">No potential impact is foreseen. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p data-bbox="702 1554 1083 1585"><b>No significant effects are likely</b></p> |



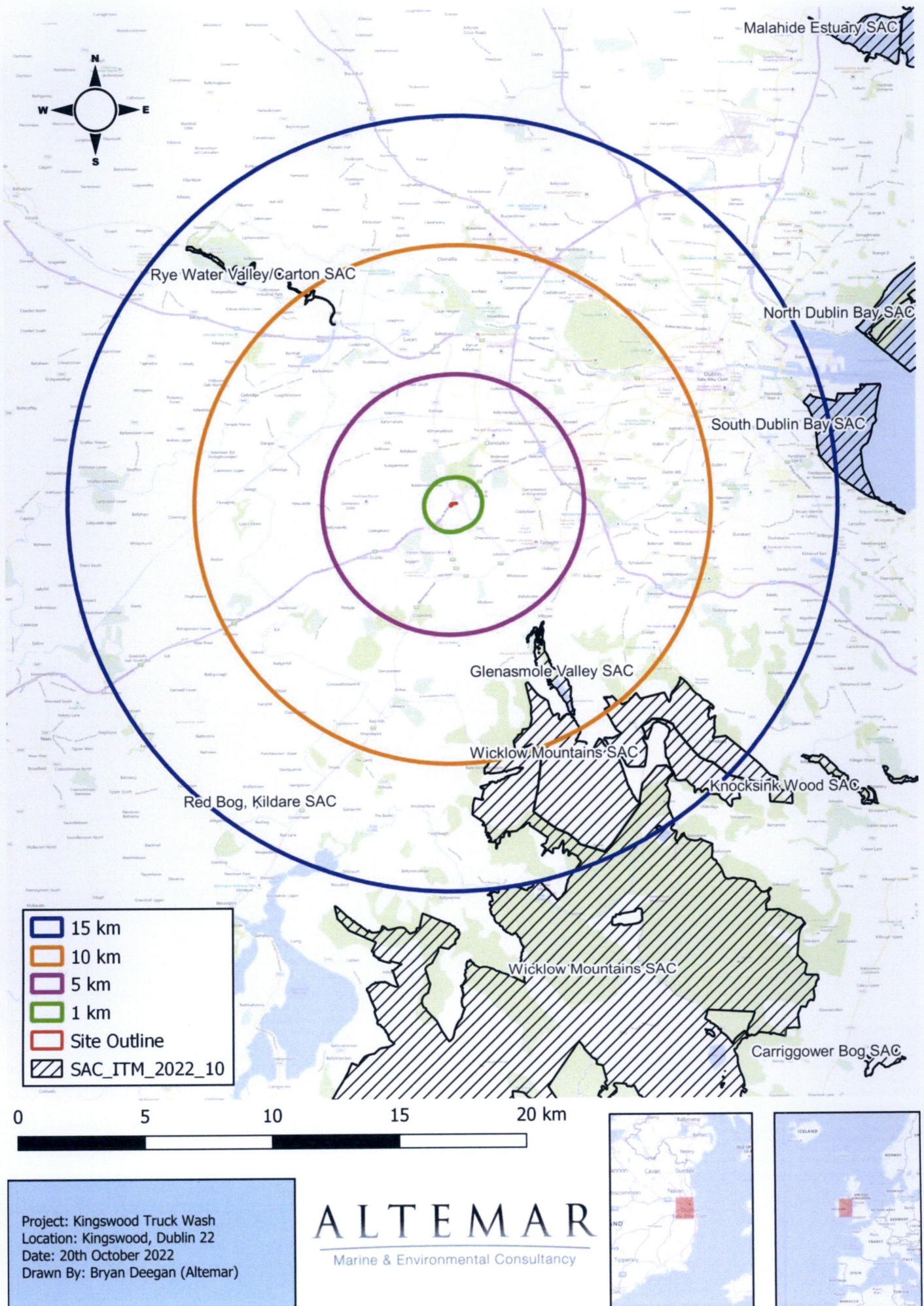


Figure 7. Special Areas of Conservation located within 15km of the proposed development



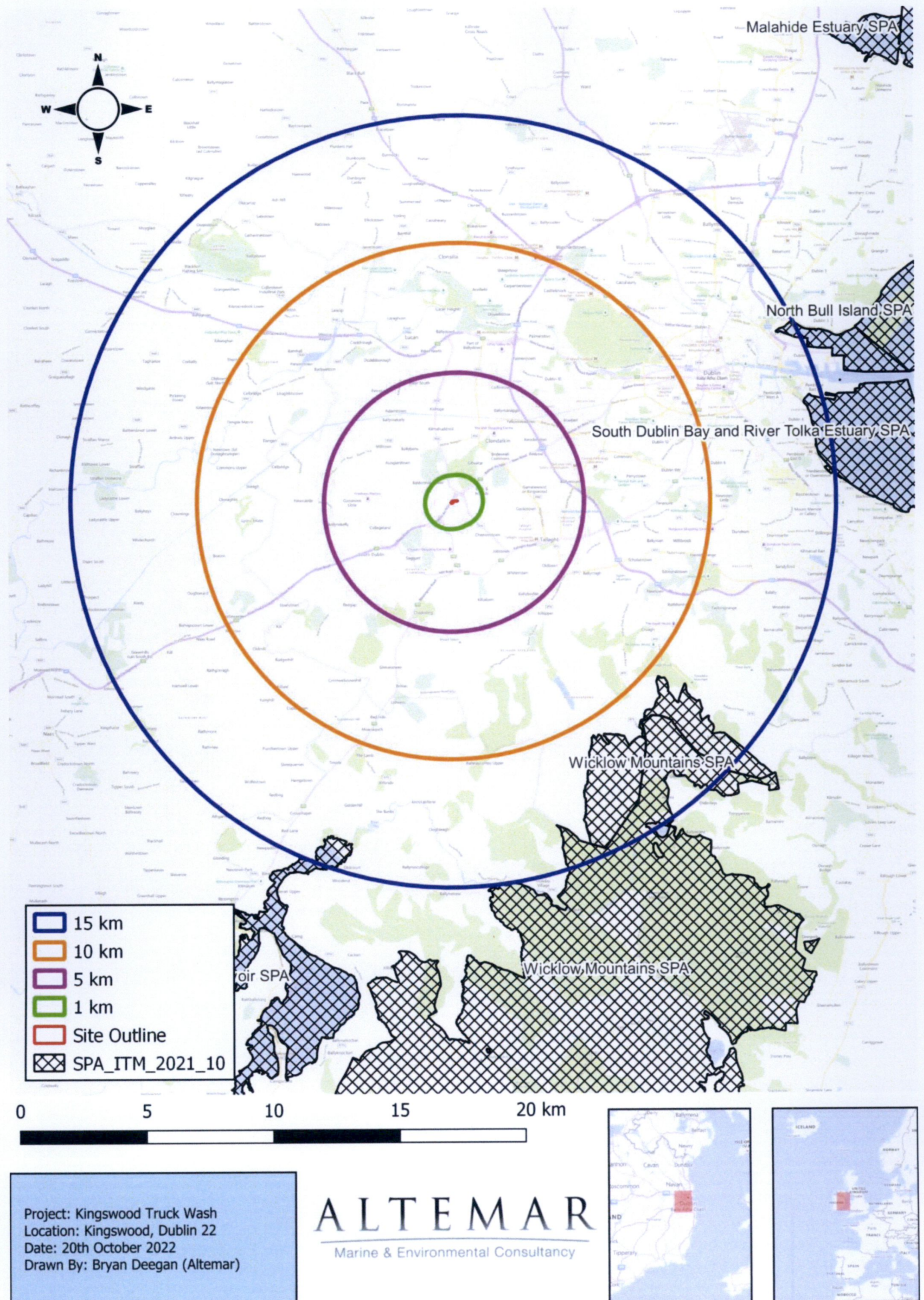
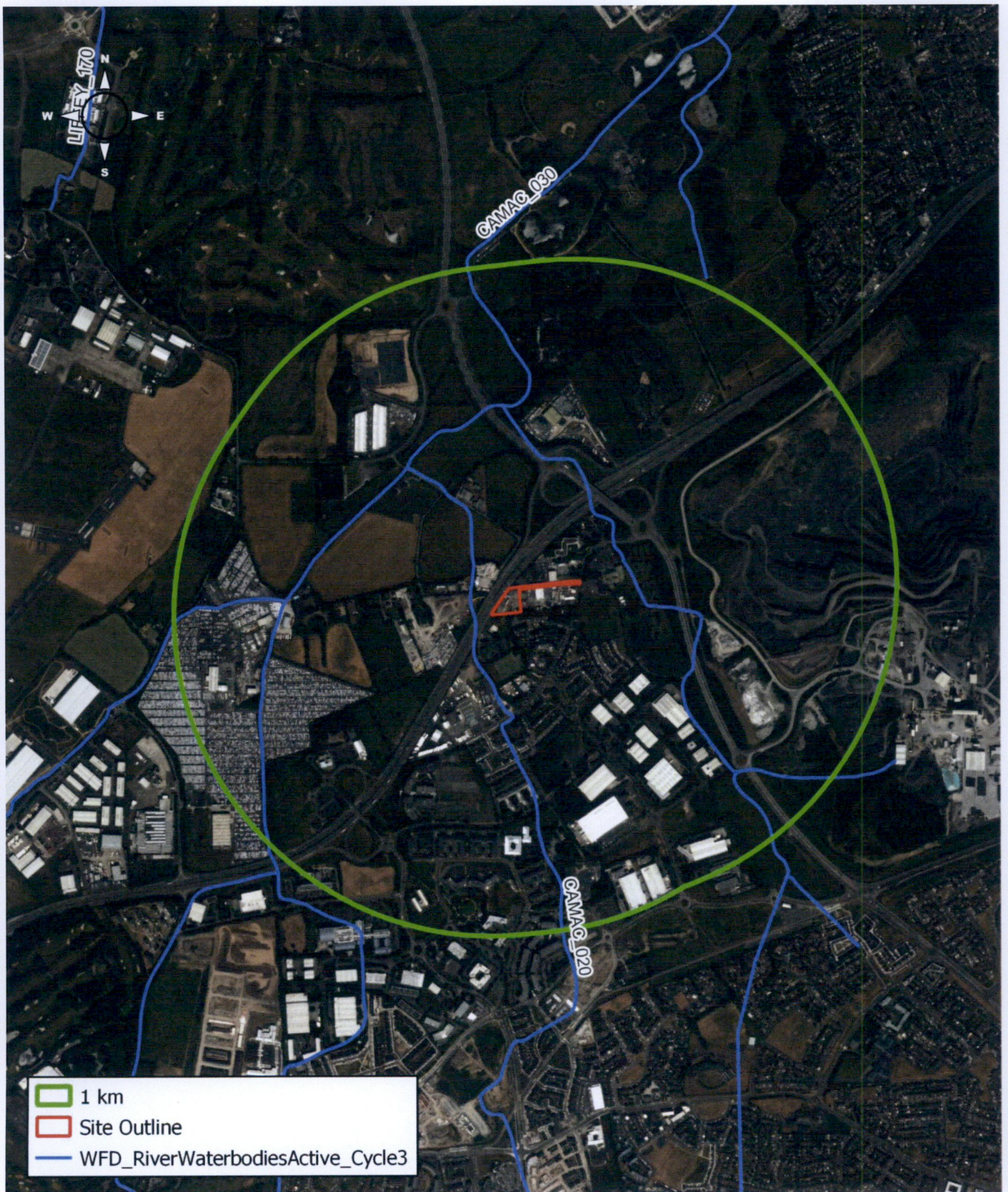


Figure 8. Special Protection Areas within 15km of the proposed development





0 0.5 1 1.5 km

Project: Kingswood Truck Wash  
 Location: Kingswood, Dublin 22  
 Date: 20th October 2022  
 Drawn By: Bryan Deegan (Altamar)

**ALTEMAR**  
 Marine & Environmental Consultancy

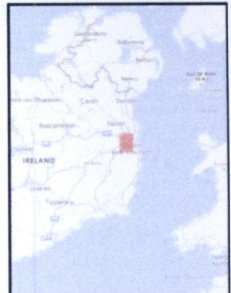
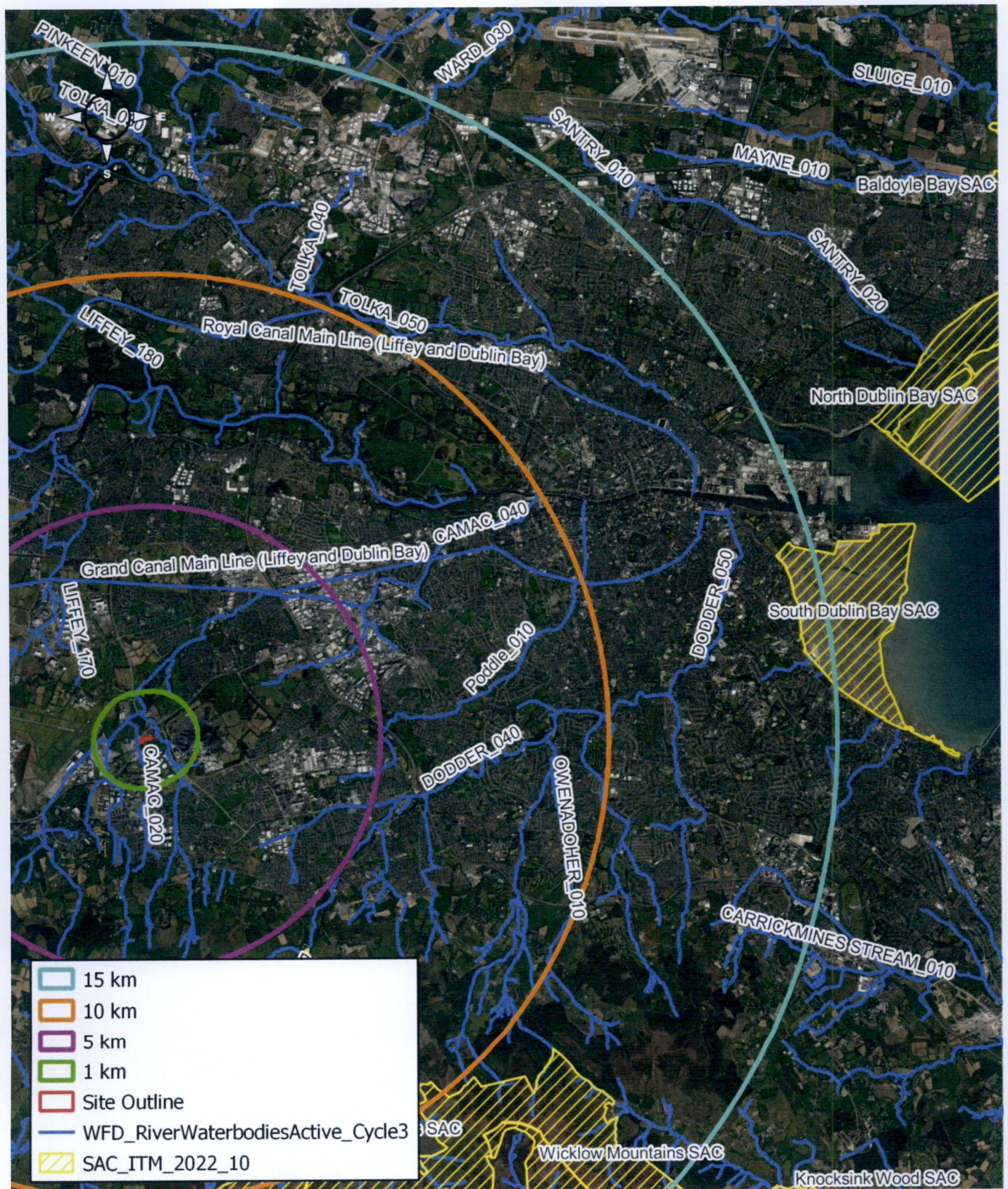


Figure 9. Waterbodies within 1km of the proposed development (EPA-WFD data)





Project: Kingswood Truck Wash  
 Location: Kingswood, Dublin 22  
 Date: 20th October 2022  
 Drawn By: Bryan Deegan (Altamar)

**ALTEMAR**  
 Marine & Environmental Consultancy

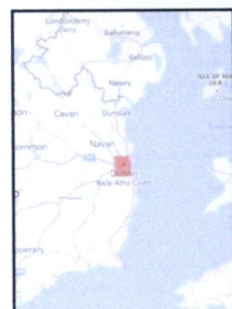


Figure 10. Waterbodies and SACs with a hydrological pathway to the subject site



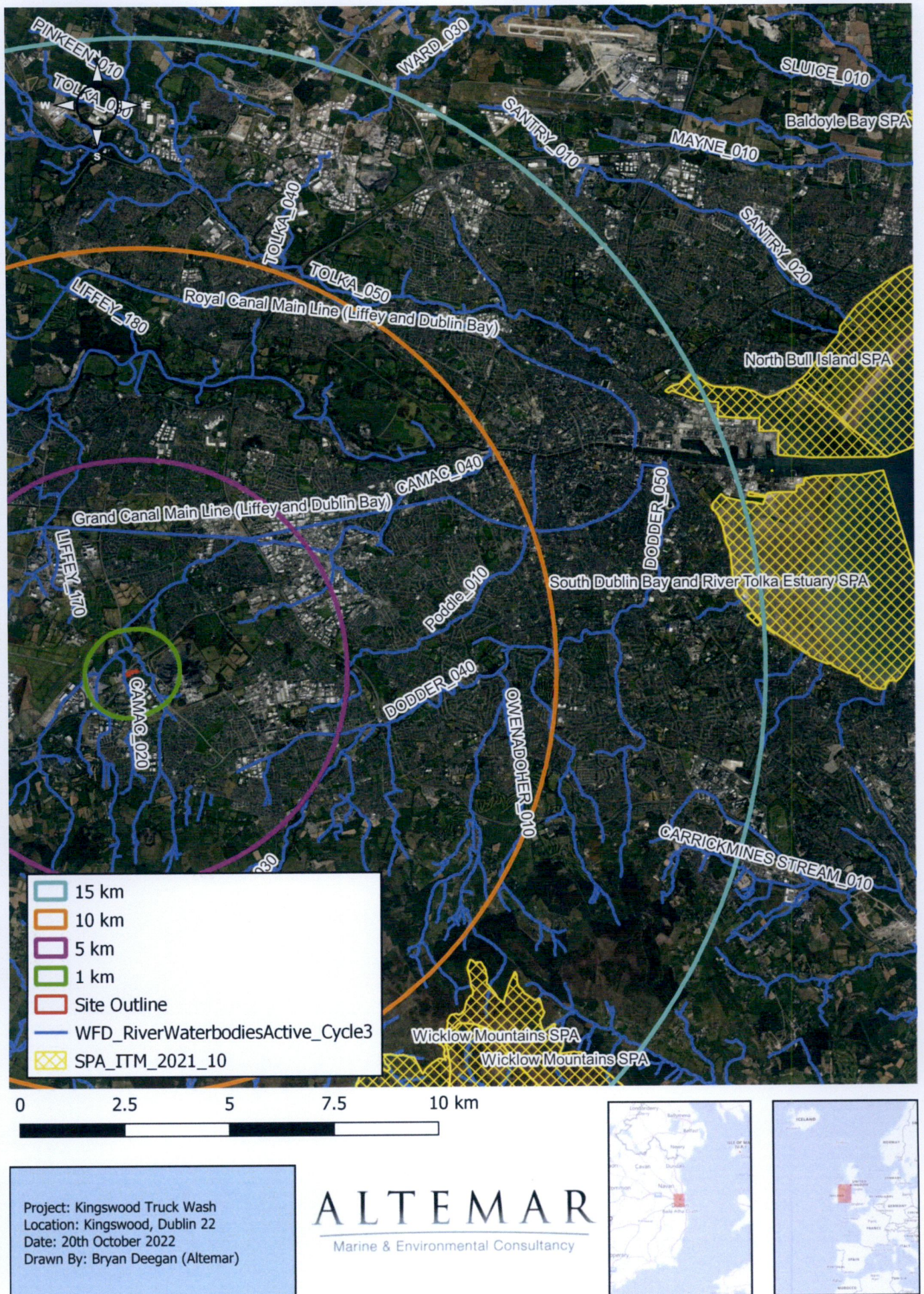


Figure 11. Waterbodies and SPAs with a hydrological pathway to the subject site



## In-Combination Effects

The following is a list of planning application(s) as identified on the Department of Housing, Local Government and Heritage's 'National Planning Application Database' portal (Table 3)<sup>2</sup>:

Table 3. Planning application details and reference numbers of sites proximate to the proposed development

| Planning Ref. | Address  | Proposal   |
|---------------|--|--|
| SD21A/0327    | Gordon Park, Old Naas Road, Kingswood, Dublin 22           | A residential development of 77 dwellings comprised of 63 two storey houses and 14 apartments & duplex units accommodated in one 3 storey building. The proposed houses are comprised of 8 two bed houses & 55 three bed houses; the proposed apartments & duplex units are comprised of 7 one bed apartments at ground floor & 7 three bed duplex units overhead. The proposed development also provides for all associated site development & infrastructural works, car & bicycle parking, open spaces, hard & soft landscaping, boundary treatments and bin & bicycle storage; access to the development will be via a new vehicular entrance at the south-west corner of the site off the Old Naas Road. Permission is also sought to demolish the existing building on site approximately 455sq.m. all on a site area of 2.28Ha, at Gordon Park, Old Naas Road, Kingswood, Dublin 22 bounded to the west by the Old Naas Road, to the south by the Silken Park development and is located in the townland of Brownsbarn.   |
| SD18A/0374    | Old Naas Road, Kingswood Cross, Dublin 22                  | Construction of single extension (9.8m x 25.4m) to southern gable of Maintenance Centre with an overall height of 7.85m together with all associated site works at Kingswood Commercials Vehicle Test Centre.  |
| SD18A/0308    | Kingswood Hotel Citywest, Naas Road, Dublin 22             | Variations to previously approved planning permission Reg. Ref. SD17A/0285 to include the following: (a) removal of existing steps and ramps to the front of the existing hotel reception; (b) construction of a new single storey glazed extension to the existing hotel reception (approx. 250sq.m) to provide a new entrance lobby with feature canopy, coffee dock area, meeting room, enlarged foyer area and link access to existing Cookhouse Bar & Restaurant; (c) construction of a new single storey, glazed conservatory extension to the existing breakfast room (approx. 72sq.m); (d) construction of a 2 storey extension to the existing Cookhouse Bar & Restaurant to provide extended ground floor bar/restaurant facilities with an external terrace and extended first floor function room facilities over with an external terrace and landscaped roof garden; (e) conversion of the existing Kingswood Country House (a Protected Structure) from bar/restaurant use to a conference centre to include the construction of a new single storey glazed entrance lobby; (f) closing up of the existing external access stair to basement to the rear of Kingswood Country House; (g) associated ancillary site works including hard and soft landscaping and drainage works; (h) provision of new external signage to include the hotel reception and Cookhouse entrance. |
| SD17A/0285    | Kingswood Hotel City West, Naas Road, Dublin 22.           | Construction of a part single, part two storey extension situated on top of the existing Kingswood Hotel to provide 65 new bedrooms and new 4 storey extension to the west of the site to provide 24 new bedrooms comprising a total of 89 bedrooms and all associated services, access and fire escape routes. The proposed development is adjacent to Kingswood Country House & Restaurant, a Protected Structure, no works are proposed to these structures.  |
| SD16A/0326    | Kingswood Truck Wash, Old Naas Road, Kingswood, Dublin, 22 | Provision of 3 HGV fuelling pumps located adjacent to the existing truck wash with 2 fuel dispensing islands, 2 illuminated totem signs (c.6.5m in height), 5 underground diesel storage tanks (40,000 litre capacity in each). Ancillary lighting and site landscaping works. Access to development is provided off the Old Naas Road and permission is also sought for the reinstatement and extension of the public footpath located directly north and south of the existing entrance to the site.   |

<sup>2</sup> <https://housinggov.ie/maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de>



No significant projects are proposed or currently under construction that could potentially cause in combination effects on Natura 2000 sites. Given this, it is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. It is concluded that no significant effects on Natura 2000 sites will be seen as a result of the proposed development alone or combination with other projects. **No significant effects are likely from in combination effects**

## Conclusions

The proposed development site is located within an industrial environment 5.6 km from the nearest Natura 2000 site (Glenasmole Valley SAC). Watercourses and surface runoff are seen as the main potential pathway for impacts on Natura 2000 sites. There is an indirect hydrological connection to European Sites located within Dublin Bay via the proposed surface water drainage strategy. After attenuation onsite, surface water drainage that cannot percolate into the proposed permeable SuDS features onsite will be directed to a bypass interceptor, attenuation tank, hydrobrake and existing storm water sewer located to the south of the site. This network outfalls to the River Camac, a watercourse located 50m from the subject site that outfalls to the River Liffey, and ultimately the marine environment at Dublin Bay. Therefore, there is an indirect hydrological connection to South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, and North Bull Island SPA. However, given the distance between the subject site and the nearest Natura 2000 sites along this network (14.2 km to South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA), in the absence of mitigation or SuDS measures, any pollutants or silt that may enter this surface water network will settle, be diluted, or dispersed within the extensive hydrological network and the estuarine/marine environment in the significant intervening distance and will not significantly impact on the qualifying interests of downstream Natura 2000 Sites. Therefore, the proposed development will not have a significant impact on the conservation objectives of Natura 2000 sites. It should be noted that the construction and operation of the proposed development will have to comply with Water Pollution Acts. However, the measures to comply with Water Pollutions Acts are not necessary for the protection of Natura 2000 sites.

No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the distance between the proposed development site to designated conservation sites, and the dilution effect of surface runoff, it is concluded that this development that would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or Natura 2000 site.

On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

## Data Used for AA Screening

NPWS site synopses and Conservation objectives of sites within 15km and those with a potential hydrological pathway were assessed. The most recent SAC and SPA boundary shapefiles were downloaded and overlaid on Bing road maps and satellite imagery.



## Findings of No Significant Effects Report

|   |  |
|---|--|
| <b>Details of Project</b>   | Appropriate Assessment Screening for a proposed truck was on lands at Kingswood, Old Naas Road, Kingswood Cross, Dublin 22.  |
| <b>Name and Location of NATURA 2000 Sites Within 15km (and with a potential hydrological pathway)</b>           | Glenasmole Valley SAC<br>Wicklow Mountains SAC<br>Rye Water Valley/Carton SAC<br>Red Bog, Kildare SAC<br>South Dublin Bay SAC<br>North Dublin Bay SAC<br>Wicklow Mountains SPA<br>Poulaphouca Reservoir SPA<br>South Dublin Bay and River Tolka Estuary SPA<br>North Bull Island SPA   |
| <b>Project Description</b>  | The proposed project consists of the relocation of 3 fuel pumps and the reconfiguration of permitted fuel islands from 1 long fuel island and 1 small fuel island to now provide for 3 small fuel islands, demolition/removal of single storey building along southern boundary and 1 new truck wash to south-western boundary of site; Planning permission is sought to remove 1 existing truck wash along the western boundary, demolition/removal of existing storage building to the western boundary and alterations to internal road layout to include directional arrows. |
| <b>Is the Project directly connected with the management of the NATURA 2000 site?</b>                           | No   |
| <b>Details of any other projects or plans that together with this project could affect the NATURA 2000 site</b> | None   |
| <b>The assessment of significant effects</b>  |  |
| <b>Describe how the project is likely to affect the NATURA 2000 site</b>  | No Impact Predicted  |
| <b>Response to consultation</b>   | N/A  |
| <b>Data collected to carry out the assessment</b>   | Supporting NPWS data.  |
| <b>Who carried out the assessment</b>   | Altemar Ltd.   |
| <b>Sources of data</b>  | NPWS website, standard data form, conservation objectives data of the site and references outlined in the AA Screening Report.   |
| <b>Explain why the effects are not considered significant</b>   | No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the distance between the proposed development site to designated conservation sites, and the dilution effect of surface runoff, it is concluded that this development that would not give rise to any significant effects to designated sites.  |
| <b>Level of assessment completed</b>  | Stage 1 Screening  |
| <b>Overall conclusions</b>  | On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.  |



## References

The following references were used in the preparation of this AA screening report.

1. Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive – Guidance for Planning Authorities March 2010.
2. Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government 2009;  
[http://www.npws.ie/publications/archive/NPWS\\_2009\\_AA\\_Guidance.pdf](http://www.npws.ie/publications/archive/NPWS_2009_AA_Guidance.pdf)
3. Managing NATURA 2000 Sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC, European Commission 2000;
4. Assessment of Plans and Projects Significantly Affecting NATURA 2000 Sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC;
5. Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission;
6. Guidance document on the implementation of the birds and habitats directive in estuaries and coastal zones with particular attention to port development and dredging;  
[http://ec.europa.eu/environment/nature/Natura2000/management/docs/guidance\\_doc.pdf](http://ec.europa.eu/environment/nature/Natura2000/management/docs/guidance_doc.pdf)
7. The Status of EU Protected Habitats and Species in Ireland.  
[http://www.npws.ie/publications/euconservationstatus/NPWS\\_2007\\_Conservation\\_Status\\_Report.pdf](http://www.npws.ie/publications/euconservationstatus/NPWS_2007_Conservation_Status_Report.pdf)
8. NPWS (2021) Conservation objectives for Glenasmole Valley SAC [001209]. Generic Version 8.0. Department of Housing, Local Government and Heritage.
9. NPWS (2017) Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
10. NPWS (2021) Conservation Objectives: Rye Water Valley/Carton SAC 001398. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.
11. NPWS (2019) Conservation Objectives: Red Bog, Kildare SAC 000397. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.
12. NPWS (2013) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
13. PWS (2013) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
14. NPWS (2022) Conservation objectives for Wicklow Mountains SPA [004040]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.
15. NPWS (2022) Conservation objectives for Poulaphouca Reservoir SPA [004063]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage
16. NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
17. NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.