

4 STAGE 2 - APPROPRIATE ASSESSMENT

4.1 INTRODUCTION

The Natura Impact Report (NIR) has been produced to support the Appropriate Assessment of the draft Dún Laoghaire-Rathdown County Development Plan 2016-2021 under Article 6(3) of the European Union Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive); the Planning and Development Act 2000 (as amended); and the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.

The main objective of the Stage 2 Assessment is to determine whether the Plan would result in significant adverse impacts upon the integrity of those European Sites with respect to the site's structure and function; range and its conservation objectives.

Following on from screening, this section sets out the elements of the Dún Laoghaire-Rathdown County Development Plan that were considered to have potential to give rise to significant effects on European Sites. The potential impacts were assessed in the absence of any mitigation measures, and taking account of the precautionary principle wherein the potential for effects cannot be ruled out, rather than the certainty of the effects occurring was applied.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the Plan should aim to avoid any negative impacts on European Sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts.

4.2 CONFIRMATION OF SITES BROUGHT FORWARD FROM AA SCREENING OF DRAFT DÚN LAOGHAIRE RATHDOWN CDP

As noted in Section 3, previous drafts of the CDP were assessed as part of AA Screening and it was determined that with the necessary protective policies in place that Stage 2 AA would not be required. However, following the most recent consultation on the draft CDP, one particular modification has been proposed which causes concern. While it would be reasonable to focus in on this modification and the related European Sites only in the Stage 2 Assessment, consideration was given to feedback from the DECLG and DAHG which indicated their preference for a more general Stage 2 Assessment and for that reason, the key potential impacts identified and addressed in Stage 1 Screening are re-examined here for clarity.

The Stage 1 Screening for Appropriate Assessment identified a total of 23 European Sites within Dún Laoghaire-Rathdown County and within 15km of the county boundary (Section 2.1 and Figure 2.1). In addition, it is noted that the Codling Fault Zone pcSAC was advertised by the DAHG on May 15th 2015. It remains to be formally designated which will include the drafting of its own Statutory Instrument. As the site may be designated within the lifetime of the plan, it is included in this assessment. It is noted that there are no conservation objectives currently prepared for this site; therefore objectives for similar designated sites have been considered.

Fifteen of the 23 sites identified at the outset of the Screening Stage (comprising 8 cSACs and 7 SPAs) were not brought forward to stage 2 AA owing to one of more of the following reasons:

- By virtue of their distance from the influence of the proposed plan;
- The lack of habitat or hydrological connectivity between the designated site and the elements making up the proposed plan; and / or
- The nature of their qualifying interests and/or their occurrence within the study area.

The Screening stage considered the potential for adverse impacts on each of the remaining eight European Sites using a source-pathway-receptor approach. Where potential for effect was identified or where it was unclear if a pathway existed, the European Site was given further consideration. After reviewing the policies and objectives within the draft CDP, eight sites were considered to have potential for impact (**Table 4.1**).

Table 4.1: European Sites Brought forward to the Stage 2 Assessment

Site Name	Site Code
South Dublin Bay cSAC	000210
Ballyman Glen cSAC	000713
Knocksink Wood cSAC	000725
Wicklow Mountains cSAC	002122
Rockabill to Dalkey cSAC	003000
Dalkey Islands SPA	004172
South Dublin Bay & River Tolka Estuary SPA	004024
Wicklow Mountains SPA	004040

4.3 DESCRIPTION OF THE EUROPEAN SITES

In providing a summary description of the sites, the information has been summarised from NPWS sources. **Tables 4.2** provides a description of the characteristics of the European Sites identified as potentially being impacted by the implementation of the draft Dún Laoghaire-Rathdown County Development Plan.

Table 4.2: Description of European Sites Brought Forward for Consideration in Stage 2 Assessment

European Site	Site Code	Brief Site Description
South Dublin Bay cSAC	002010	Extending from the South Wall to the west pier at Dún Laoghaire, this intertidal site is characterised by with extensive areas of sand and mudflats. Its landward perimeters are largely bounded by coastal constructions – seawalls, etc. However, a number of small sandy beaches occur at Poolbeg, Irishtown and Merrion/Boosterstown. There is evidence of incipient dune formation in areas, notably the seaward side of Boosterstown marsh, which is of recent origin. The site is designated for a single Qualifying Interest, namely: Mudflats and sandflats not covered by seawater at low tide [1140]. South Dublin Bay is also part of a more extensive SPA (South Dublin Bay & River Tolka Estuary SPA 004024) supporting a number of internationally important birds.

European Site	Site Code	Brief Site Description
Ballyman Glen cSAC	000713	The site is located approximately 3km north of Enniskerry where it straddles the county boundary. The Glen is characterised by pastoral ground sloping up from a small stream that winds its way along the Glen floor. The site has been designated SAC due to the presence of petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220], a priority Annex I habitat and Alkaline fens [7230]. The fen vegetation at this site is well developed, with an unusually large number of sedge species present. The presence of alkaline fen and of petrifying spring/seepage areas is also particularly notable, as these habitats are listed, the latter with priority status, on Annex I of the E.U. Habitats Directive. Fens are rare in Wicklow and Dublin, and this is one of only two sites in Wicklow for the Narrow-leaved Marsh orchid.
Knocksink Wood cSAC	000725	Located in a steeply-sided valley, just north-west of Enniskerry in Co. Wicklow, the fast flowing Glencullen River winds its way over granite boulders along the valley floor. Much of the terrain is covered with calcareous drift and supports extensive areas of woodland as well as other ecological features. The SAC has been designated specifically due to the presence of two priority Annex I habitats, namely: Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] and Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0]. The site has national importance as having one of the most diverse woodland invertebrate faunas in the country, some of which are considered to be under threat at an international level. A large proportion of the site has also been designated as a Statutory Nature Reserve.
Wicklow Mountains cSAC	002122	This site comprises a complex of upland areas in Counties Wicklow and Dublin, flanked by the Blessington reservoir to the west and Vartry reservoir in the east, Cruagh Mountain in the north and Lybagh Mountain in the south. Most of the site occurs at elevations over 300 m, the highest point being Lugnuquilla at 925m. Within its boundaries there is considerable topographical and geomorphological diversity as well as ecological richness. There is for much of its extent overlap with the Wicklow Mountains SPA. The qualifying features for the site include eleven Annex I Habitats, namely; Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]; Natural dystrophic lakes and ponds [3160]; Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]; European dry heaths [4030]; Alpine and Boreal heaths [4060]; Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]; Calcareous rocky slopes with chasmophytic vegetation [8210]; Siliceous rocky slopes with chasmophytic vegetation [8220]; Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] as well as 2 priority Habitats: Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] and Blanket bogs (* if active bog) [7130] along with a single Annex II species: <i>Lutra lutra</i> (Otter) [1355].
Rockabill to Dalkey Island cSAC	003000	This is a long linear site within the Irish Sea, approximately 7km wide and 40km long runs from Rockabill southwards towards Frazer Bank. It encompasses inshore and coastal waters and includes the seabed, reefs, sandbanks and a small number of islands (Dalkey, Muglins and Rockabill Islands). Its Qualifying Interests are: Reefs [1170] and Harbour Porpoise (<i>Phocoena phocoena</i>) [1351]. The NPWS note that Reefs are an uncommon feature along the Eastern seaboard. Conversely, the SAC is a key habitat for the Porpoise within the Irish Sea. As part of the wider

European Site	Site Code	Brief Site Description
		Dublin Bay complex, the area is an important national and international resource for birds. In relation to terrestrial element of the SAC, Dalkey Island supports large number of terns (Arctic, Common and Roseate while other seabirds commonly seen include Kittiwake, Razorbill, Guillemot, Puffin, Fulmar, Shag, Cormorant, Manx Shearwater, Gannet and Gulls.
Dalkey Islands SPA	004172	The SPA comprises a string of three small islands, namely Dalkey Island, Lamb Island and Maiden Rock, as well as the intervening rocks and reefs, and the surrounding sea to a distance of 200 m. As the largest island, Dalkey Island lies approximately 400 m off Sorrento Point on the mainland from which it is separated by a deep channel. This site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest due to the presence of the Roseate Tern (<i>Sterna dougallii</i>) [A192], Common Tern (<i>Sterna hirundo</i>) [A193] and Arctic Tern (<i>Sterna paradisaea</i>) [A194].
South Dublin Bay & River Tolka Estuary SPA	004024	South Dublin Bay and River Tolka Estuary SPA comprises a substantial part of Dublin Bay. It far exceeds the boundaries of the preceding SAC. It includes the intertidal area between the River Liffey and Dún Laoghaire, and the estuary of the River Tolka to the north of the River Liffey, as well as Booterstown Marsh. A portion of the shallow marine waters of the bay is also included. The site is an important site for wintering waterfowl, being an integral part of the wider Dublin Bay complex. The Special Conservation Interests for the site include 13 Annex I Bird Species and 1 Habitat, namely; Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]; Oystercatcher (<i>Haematopus ostralegus</i>) [A130]; Ringed Plover (<i>Charadrius hiaticula</i>) [A137]; Grey Plover (<i>Pluvialis squatarola</i>) [A141]; Knot (<i>Calidris canutus</i>) [A143]; Sanderling (<i>Calidris alba</i>) [A144]; Dunlin (<i>Calidris alpina</i>) [A149]; Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]; Redshank (<i>Tringa totanus</i>) [A162]; Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]; Roseate Tern (<i>Sterna dougallii</i>) [A192]; Common Tern (<i>Sterna hirundo</i>) [A193]; Arctic Tern (<i>Sterna paradisaea</i>) [A194] & Wetland and Waterbirds [A999].
Wicklow Mountains SPA	004040	This is an extensive upland site, which largely overlaps with Wicklow Mountains cSAC. The SPA comprises a substantial part of the Wicklow Mountains within County Wicklow but extends into Co. Dublin. Given its extent, it is considered a site of high ornithological importance owing in part to the range of habitats and the bird species that have been recorded there, in particular Merlin (<i>Falco columbarius</i>) [A098] and Peregrine (<i>Falco peregrinus</i>) [A103], both of which are the qualifying species for the SPA.

4.3.1 Other Natural Heritage

Dún Laoghaire-Rathdown, stretching from the coastal strip along Dublin Bay to the uplands of the Dublin Mountains, contains a wide range of diverse habitats. These include coastal habitats, urban gardens, parks and other areas of managed amenity grassland, woodlands (natural, semi-natural and commercial), hedgerows, rivers and streams, areas of upland grassland and upland heath and bog. Agricultural and upland habitats are predominant in the southern/south-western area of Dún Laoghaire-Rathdown, while urban environments dominate the northern and eastern areas of the County. While the AA process is specifically addressing European Sites (SAC and SPA), some recognition of other natural heritage areas is also required as they are often supporting features to the objectives of restore or maintain favourable conservation status in the European sites.

Natural Heritage Areas (NHAs) are designated due to their national conservation value for ecological and/or geological/geomorphological heritage. In many cases the NHA boundary overlaps with the SAC or SPA boundary or extends beyond it forming a buffer to the European Site boundary. They cover nationally important semi-natural and natural habitats, landforms or geomorphological features, plant and animal species or a diversity of these natural attributes. NHAs are designated under the Wildlife (Amendment) Act 2000. Proposed NHAs in the Plan area include:-

- Booterstown Marsh;
- Dalkey Coastal Zone and Killiney Hill;
- Fitzsimons Wood;
- Loughlinstown Woods;
- Dingle Glen;
- Ballybetagh Bog; and
South Dublin Bay SAC.

Ballyman Glen SAC and Knocksink Wood SAC are also designated as pNHAs.

4.4 CONSERVATION OBJECTIVES

Article 6.3 of the Habitats Directive requires the focus, at this stage of the assessment to be on the integrity of the site as indicated by its Conservation Objectives/Special Conservation Interests of the qualifying features of the SACs and SPAs.

Conservation Objectives, where available, were downloaded from the NPWS website (www.npws.ie) on November 10th, 2015. The Conservation Objectives and their date of issue for the relevant sites are shown in **Table 4.3**.

Site-specific conservation objectives aim to define favourable conservation condition for the qualifying interests, i.e. Annex I habitat and Annex II species, as applicable. The conservation objectives are presented as a list of attributes against which targets have been set. All of the attributes in relation to each relevant feature have been considered in relation to the potential impacts associated with the draft Dún Laoghaire-Rathdown County Development Plan.

The maintenance of favourable condition of these habitats and species at the site level will contribute to the overall maintenance of favourable conservation status of those habitats and species at national level.

- **Favourable conservation status** of a **habitat** can be described as being achieved when: “its natural range, and the area it covers within that range, is stable or increasing, and the ecological factors that are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and the conservation status of its typical species is favourable”.
- **Favourable conservation status** of a **species** can be described as being achieved when: “population data on the species concerned indicate that it is maintaining itself, and the natural range of the species is neither being reduced or likely to be reduced for the foreseeable future, and there is, and will probably continue to be, sufficiently large habitat to maintain its populations on a long term basis”.

Where conservation objectives have not yet been set, a set of generic conservation objectives has been produced by NPWS.

Generic Conservation Objectives for SACs are as follows:-

- To maintain Annex I habitats and Annex II species for which the cSAC has been selected at favourable conservation condition.

Generic Conservation Objectives for SPAs are as follows:

- To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for the SPA.

Table 4.3: Conservation Objectives for European Sites

European Site*	Site Code	Conservation Objectives	Version Number & Date of Issue
South Dublin Bay cSAC	000210	To maintain the favourable conservation condition of the Annex I Habitat for which the SAC has been selected.	Site specific version 1.0 22 nd August 2013
Ballyman Glen cSAC	000713	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.	Generic Version 4.0 13 th February 2015
Knocksink Wood cSAC	000725	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.	Generic Version 4.0 13 th February 2015
Wicklow Mountains cSAC	002122	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.	Generic Version 4.0 13 th February 2015
Rockabill to Dalkey cSAC	003000	To maintain the favourable conservation condition of the Annex I Habitat and Annex II Species for which the SAC has been selected.	Site specific version 1.0 7 th May 2013
Dalkey Islands SPA	004172	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	Generic Version 4.0 13 th February 2015
South Dublin Bay & River Tolka Estuary SPA	004024	To maintain the favourable conservation condition of all SCI's (with the exception of Grey Plover) for which the SPA has been selected. The grey plover is proposed for removal from the list of Special Conservation Interests for this SPA. As a result, a site-specific conservation objective has not been set for this species.	Site specific version 1.0 9 th March 2015
Wicklow Mountains SPA	004040	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	Generic Version 4.0 13 th February 2015

*Full Details of the Conservation Objectives/Special Conservation Interests are available on the NPWS website at www.npws.ie/sites/default/files/protected-sites