

Appropriate Assessment Screening Report

Development of Raheen Park (Par 3) Trails,
Bray, Co. Wicklow – November 2022

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for Wicklow County Council
Co. Wicklow

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Field Investigations and Data

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work. Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by Alan Lauder Consulting for inaccuracies in the data supplied by any other party.

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1. Introduction

This report, which contains information required for the competent authority to undertake a Stage One Screening Assessment (“AA screening”) in respect of the proposed developments at Raheen Park (Par 3) Trails in Bray, Co. Wicklow was prepared by Stephanie Quinn and Alan Lauder of *ALCnature* on behalf of their client, Wicklow County Council.

This report provides information and appraises the potential for this project to have significant effects, either individually or in combination with other plans or projects, on any Natura 2000 sites (hereafter ‘European sites’).

2. Legislation and Background

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter ‘the Habitats Directive’) requires that, any plan or project not directly connected with or necessary to the management of a European site, but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to AA of its implications for the site in view of the site's conservation objectives.

The possibility of there being a significant effect on a European site will generate the need for an AA to be carried out by the competent authority for the purposes of Article 6(3). Accordingly, a screening for AA in respect of an application for consent for proposed development must be carried out by the competent authority in order to assess, in view of best scientific knowledge, if the proposed project, individually or in combination with another plan or project is likely to have a significant effect on any European site.

A Stage Two AA is required if it cannot be excluded, on the basis of objective information, that a proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site. The Screening (Stage One) operates to determine whether an AA (Stage Two) must be undertaken on the implications of the plan or project for the conservation objectives of relevant European sites.

This document comprises information to enable the competent authority to perform a Stage One Screening for AA.

3. Guidance

This AA screening report has been prepared with reference to the following guidance documents where relevant:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 revision)
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10
- 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 (European Commission Environment Directorate-General, 2001)
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat’s Directive 92/43/EEC (EC Environment Directorate-General, 2000 updated draft April 2015)

- 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 European Commission (European Commission, January 2007)
- Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive. Findings of an international workshop on Appropriate Assessment in Oxford, December 2009

4. Methodology

4.1 Site Visits and Desk Study

The information collected for this report, to assist the competent authority to screen the proposal for AA, was based on a desktop study, detailed site inspection and discussions with the client. The site visit was carried out on 07 September 2022, to examine the habitats and characteristics of potential areas to be utilised by the operations and to inspect the areas for the likely presence of protected species and qualifying interests.

Information relied upon included the following information sources, which included maps and ecological data:

- Ordnance Survey of Ireland mapping and aerial photography available from www.osi.ie
- Online data available on European sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie
- Information gleaned from the Trail Sketch provided by the client outlining the proposed development plans (Appendix 1)
- Information on the status of EU protected habitats and species in Ireland (National Parks & Wildlife Service)

4.2 Site specific survey work

A site-specific survey of the area was carried out for the following species and habitats (qualifying interests of designated sites and protected species):

Feature (* denotes a priority habitat)	Status	Designated site	Survey type	Date surveyed
Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	QI/Annex I habitat (SAC)	Bray Head SAC	Walkover habitat survey for presence/absence/extent	07/09/2022
European dry heaths [4030]	QI/Annex I habitat (SAC)	Bray Head SAC	Walkover habitat survey for presence/absence/extent	07/09/2022

4.3 Authors Qualifications and Expertise

This report has been prepared by Alan Lauder, Owner/principal at Alan Lauder Consulting¹ and Stephanie Quinn, Graduate Ecologist at ALC.

Alan gained an honours degree in Ecology from The University of Stirling in 1989 and is an experienced ecologist, nature conservation and habitat management specialist with over 29 years professional post-graduate experience. His relevant professional experience includes extensive planning related casework for state and non-governmental organisations within Scotland and Ireland, input to and preparation of site designations, Environmental Impact Statements & Assessments. He has extensive knowledge of survey and conservation management of a wide range of habitats and is a highly experienced wetland and coastal habitats specialist with over 30 years managing designated sites and nature reserves in Scotland and Ireland. He is also a highly experienced ornithologist with considerable, recognised expertise in woodland, wetland and upland bird ecology, mammal survey including bats and the ecology and management of macro-invertebrates, notably butterflies and Odonata. Alan currently carries out a wide range of relevant work including management planning for designated sites, ecological assessment and advisory works for a wide range of commercial and state clients. He has attended a range of relevant training courses throughout his career including training in Appropriate Assessment from CIEEM (2016).

Stephanie Quinn is Graduate Ecologist with ALC since May 2021, and has supported completion of several AA Screening Reports concerning grassland and woodland habitats and various types of operation and development. She holds an MSc in Wildlife Conservation and Management from University College Dublin, including modules on GIS and Habitat Assessment. She has lead on several habitat and species surveys, AA screening reports, NIS and EclA and has contributed to Biodiversity Enhancement and Management Plans for local authorities and government bodies.

¹ More information at www.Alanlauderconsulting.com

4.4 AA Screening Methodology

The above referenced guidance documents set out a staged process for carrying out AA, the first stage of which is referred to as Screening. This stage identifies the likely significant impacts on a Natura site, if any, which could arise from a proposed project either alone or in combination with other plans and projects. If the conclusions at the end of screening are that there is no likelihood of significant effects occurring on any European sites, as a result of the proposed plan or project, either alone or in combination with other plans and projects, then there is no requirement to undertake AA.

However, even if screening makes a finding of no significant effects, and therefore concludes that AA is not required, these findings must be clearly documented in order to provide transparency of decision-making, and to ensure the application of the ‘precautionary principle’ where this may be required.

Screening for AA involves the following:

1. Determining whether a project or plan is directly connected with or necessary to the conservation management of any European sites
2. Describing the details of the project/plan proposals and other plans or projects that may cumulatively affect any European sites
3. Describing the characteristics of relevant European sites
4. Appraising likely significant effects of the proposed project on relevant European sites.

4.5 Stage Two – Appropriate Assessment

Appropriate assessment will only proceed if there is assessed to be a likelihood of significant adverse effects occurring on any European sites, as a result of the proposed project, either alone or in combination with other plans and projects or where there is a requirement to apply the ‘precautionary principle’.

5. Overview of Proposed Project and its Receiving Environment

5.1 Description of Proposed Project

The client Layout Plan is contained at Appendix 1. This plan details the proposed works to be considered as part of this screening report.

The project consists of the development of amenities at Raheen Park (Par 3) on council-owned lands at Bray Head in Bray, Co. Wicklow. The project site lies adjacent to Bray Head SAC. Figure 1 below shows the location of the proposed development in relation to the European Site. The site is currently made up of improved amenity grassland with an existing trail.

The proposed development includes the following:

- a. Development of two new footpaths, one with a maximum gradient 1:15-1:20 and one with gradient 1:20. Paths to be 2m wide with compacted graded stone base with hoggin surface. Total trail length of approximately 1420m
- b. Implementation of access ramps along path with landings every 5m
- c. Implementation of benches along trail with concrete base, 40m apart

- d. Development of 2,500 sqm wildflower meadow in accordance with biodiversity plan, and grassland management plan to promote biodiversity
- e. Development of ‘Woodland Area’ along with a tree-planting masterplan for appropriate species-selection and protection of views

All above listed developments can be found in the client Layout Plan at Appendix 1.

This screening report is produced as part of a suite of ecological projects being conducted as part of a NeighbourWood Scheme and an overall Conservation Management Plan at Bray Head.

For the purposes of this report, the council-owned lands containing the area for proposed actions at Raheen Park (Par 3) is referred to as the project footprint.

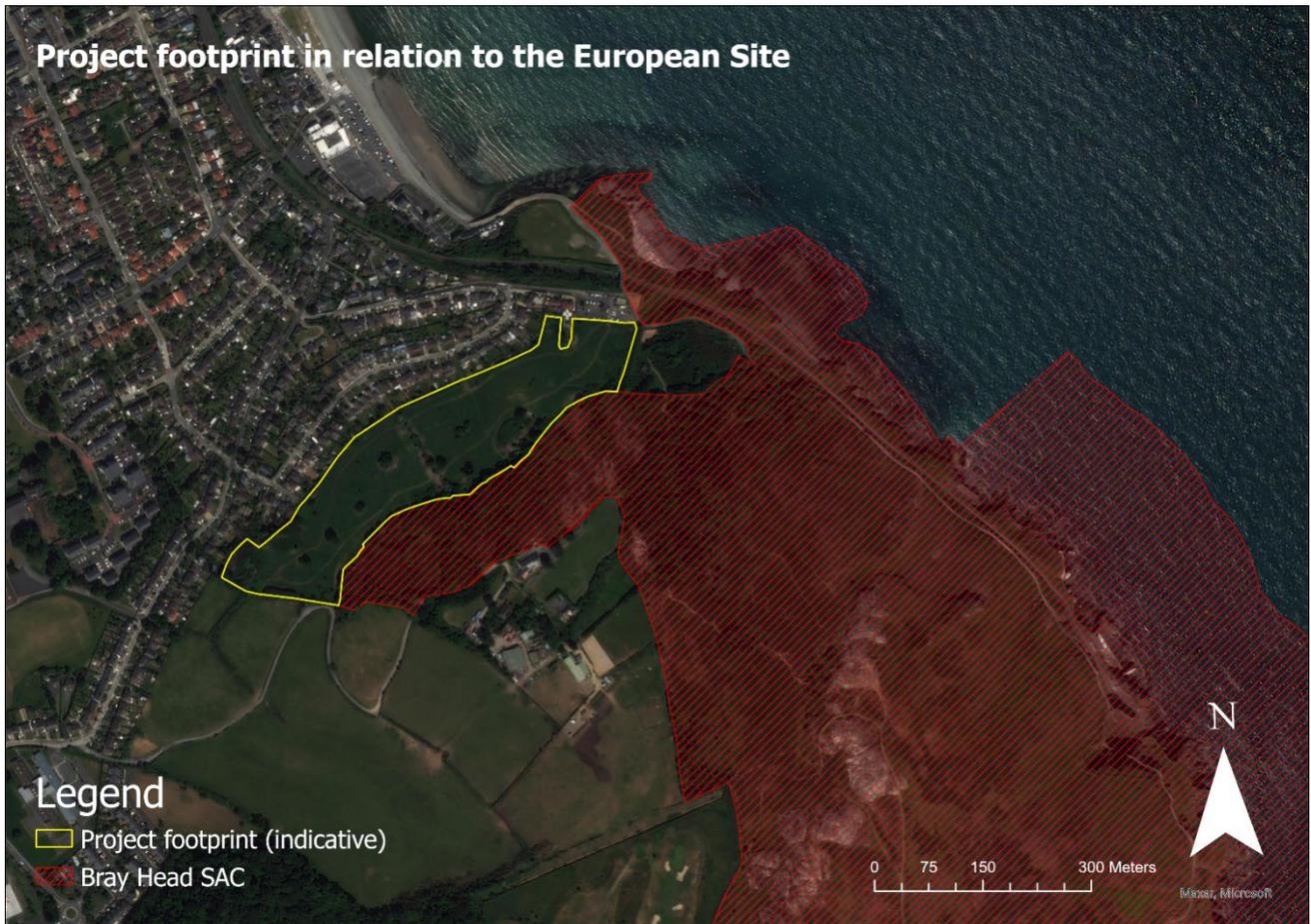


Figure 1 Project footprint in relation to Bray Head SAC

5.2 Description of the Receiving Environment

The project footprint is contained within an area of approximately 7 ha, located on the northern slopes of Bray Head in Bray, Co. Wicklow. The receiving environment comprises amenity grassland with an existing unsurfaced trail, some scrub and woodland edge. The project footprint is currently used for recreation, especially dog-walking. There is some archaeological significance from the ruins of a church ‘Raheen-a-Cluig’ which is present within the project footprint. The boundaries of Bray Head SAC lie directly and indirectly adjacent to the project footprint on the east and south-eastern edge.

Bray Head SAC² is a coastal site consisting of a plateau of high ground reaching 241m at its highest point, which is covered by the dry heath (Annex I), dry calcareous grassland, and native woodland in parts. Rocky sea cliffs (Annex I) occur along the eastern edge of the site, stretching approximately 3km from Bray to Greystones.

The dry heath habitat at the upper plateaus of Bray Head is composed mostly of Heather *Calluna vulgaris*, Bell Heather *Erica cinerea*, and gorse *Ulex europaeus* and *U. gallii*. Where Broom *Cytisus scoparius* occurs, the Red Data Book species Greater Broomrape *Orobanche rapum-genistae* is associated. Bracken is present in parts. The heath community here differs from that occurring on top of the sea-cliffs, where the habitat is more open and south-facing in places. The community is comprised of grasses, and species such as Wood Sage *Teucrium scorodonia*, Scarlet Pimpernel *Anagallis arvensis*, and sometimes appearing after a fire event, Climbing Corydalis *Ceratocarpus claviculata*. The rare Red Data Book species Bird's-foot *Ornithopus perpusillus* and Spring Vetch *Vicia lathyroides* have also been reported.

Dry calcareous grassland typically occurs on deposits of glacial till, supporting species such as Quaking-grass *Briza media*, Smooth Meadow-grass *Poa pratensis* and Red Fescue *Festuca rubra*. The habitat supports orchids including Fragrant Orchid *Gymnadenia conopsea* and Bee Orchid *Ophrys apifera*. A very rare species for the east of Ireland, Bloody Crane's-bill *Geranium sanguineum* has been reported here.

Two km of rocky sea cliff and a further 1km of soft clay cliff form most of the seaward boundary of the SAC, reaching up to 60m in height. A railway track, which was built in the 1800's, divides the cliffs. Exposed parts of the lower cliffs support species such as Common Scurvygrass *Cochlearia officinalis* and Rock Sea-spurrey *Spergularia rupicola*, and the locally scarce Tree Mallow *Lavatera arborea* has been reported, while the upper cliffs include Kidney Vetch *Anthyllis vulneraria* and Red Fescue. Ivy *Hedera helix* is widespread in the mid to upper parts, and is associated with the scarce species, Wild Madder *Rubia peregrina*.

Native woodland occurs in the northern part of the site, and consists of Sessile Oak *Quercus petraea*, Ash *Fraxinus excelsior* and Downy Birch *Betula pubescens*, with a dominant understorey vegetation of Holly *Ilex aquifolium* and Hawthorn *Crataegus monogyna*.

An important seabird colony is supported by the sea cliffs within the SAC, including nationally important numbers of Kittiwake *Rissa tridactyla* and Black Guillemot *Cephus grylle* (according to a census conducted in 1999)³. Peregrine Falcon *Falco peregrinus*, Raven *Corvus corax*, and Kestrel *Falco tinnunculus* have been reported to breed at the site. Species such as Stonechat *Saxicola rubicola* and Linnet *Carduelis cannabina* are common in the heath areas.

The rare Cambrian fossil *Oldhamia radiata* occurs.

Reclamation for agriculture and frequent fires are a threat to the grassland and heathland. The site is a popular recreational amenity and has experienced erosion as a result, particularly in the woodland, as well as littering and anti-social behaviour. Erosion on the rocky sea cliffs and landslides have occurred along the frequently used 'cliff walk' in recent years.

² Bray Head SAC. Available at: <https://www.npws.ie/protected-sites/sac/000714>

³ Mitchell, P. I., Newton, S. F., Ratcliffe, N. and Dunn, T. E. 2004. Seabird Populations of Britain and Ireland. JNCC. Peterborough, ISBN 0 7136 6901 2.

6. Provision of Information for Stage One Screening

6.1 Zone of Influence of the Proposed Project

While there is no recommended distance from a proposal for which European sites are considered as being relevant for AA, national guidance (DCHG, 2010⁴) recommends that the distance should be evaluated on a case-by-case basis with reference to the nature, size and location of the project, the sensitivities of the ecological receptors and the potential for in combination effects. As a general rule, it is often considered appropriate to look at European Sites which fall within 15 km of a project for typical moderate scale development projects such as buildings and energy developments, however, those which might introduce significant ecological or environmental factors such as significant permanent traffic changes or pollution risk for example, may require sites to be examined at greater distance through potential catchment effects. Similarly, where large scale territories or ranging of important birds may take them beyond the boundaries of a designated site then a development in excess of 15 km may have the potential to impact upon qualifying interests of a European site.

In this case the proposed project is:

1. A restricted project total area of c. 7 ha.
2. Low key and nature conservation driven actions
3. Shares part of its boundary with the European Site
4. Lacks a direct linkage with Bray Head SAC and its qualifying interests

Due to the small scale of this project and its low key activities, only Bray Head SAC is relevant to this project and other designated areas beyond the immediate vicinity of the project area are not relevant.

6.2 Relevant European Sites and Qualifying Interests

Given the notes regarding the nature of the project (Section 5) and its zone of influence (6.1) the European sites considered to be of relevance are:

1. Bray Head SAC [Site code: 000714]

The relevant site, its interest features, distance and direction from the proposed project are presented in Table 6.2.1.

Sites at greater distance (see Figure 2) have not been selected as relevant as the scale and nature of the project is small and highly localised whereby sources of risk are low or localised and receptors are either not present or separated from any potential source of risk by significant distance thereby not creating a clear pathway.

⁴ Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 revision)

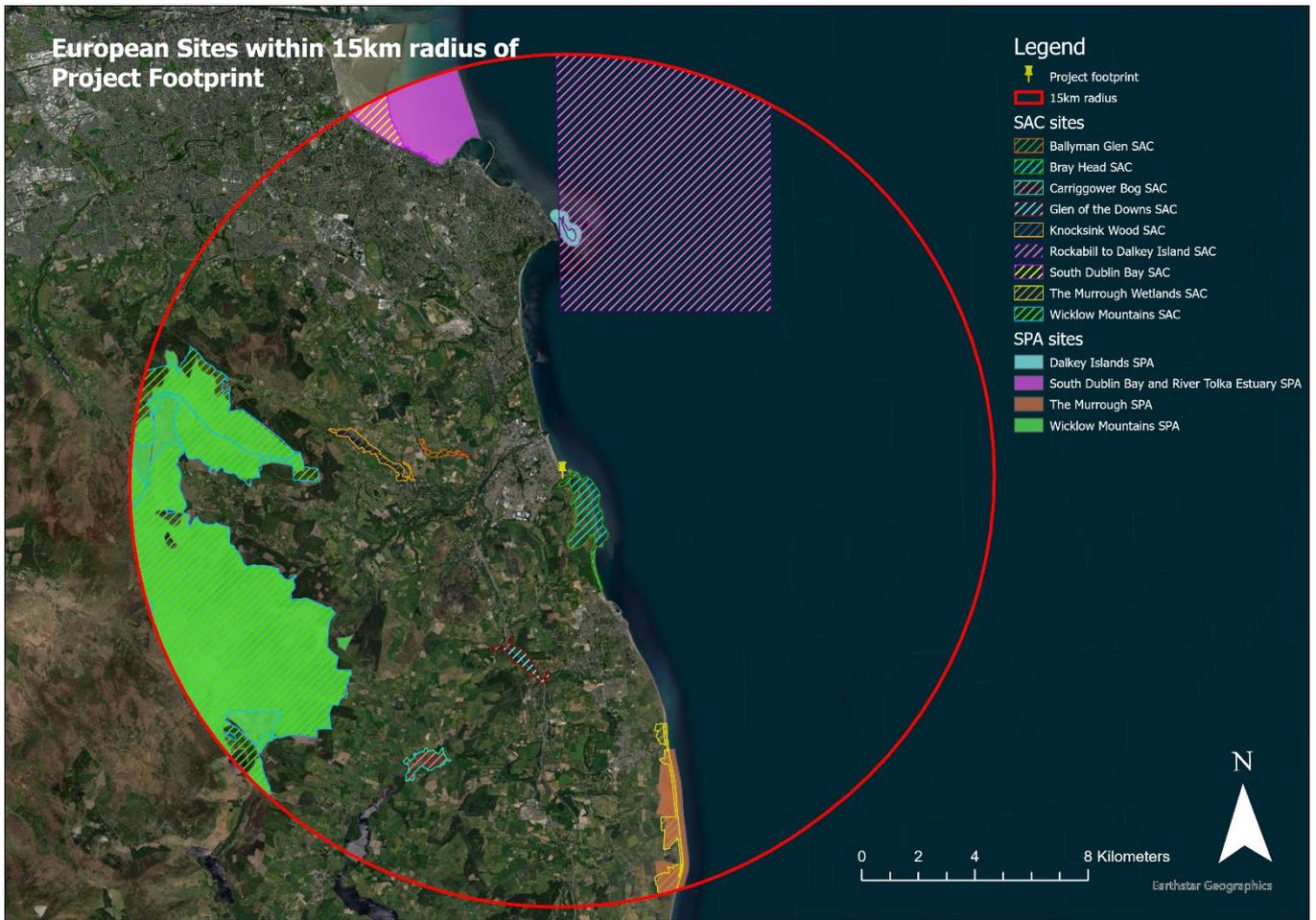


Figure 2 European Sites located within a 15km radius of the project footprint

Table 6.2.1 Relevant European Sites and Qualifying Features of Interest

Site name	Qualifying Interest Features	Distance	Direction
Bray Head SAC	The site is designated for the following habitats and species (* denotes a priority habitat); Vegetated Sea Cliffs of the Atlantic and Baltic coasts [1230] European Dry Heath [4030]	< 0.1 Km at nearest point	N/NE/E/SE

Table 6.2.2 outlines the qualifying interests or features associated with the site in addition to identified sensitivities of each outlined within their Natura 2000 forms or statutory instruments.

Table 6.2.2 European Site with Associated Conservation Objectives and Identified Threats and Pressures

Bray Head SAC	
Conservation Objectives	Identified Threats and Pressures
The site is designated for the following habitats and species (* denotes a priority habitat); Vegetated Sea Cliffs of the Atlantic and Baltic coasts [1230] European Dry Heath [4030]	(from Natura 2000 form) ⁵ Threats include: Removal of hedges and copses or scrub; Vandalism; Burning down; Species composition change (succession); Erosion; Paths, tracks, cycling tracks; Urbanised areas, human habitation; Motorized vehicles

Threats and pressures may arise during the course of activities which are assessed to have either; likely significant impact or unlikely to have significant impact. This may vary due to the nature, extent, design, location or manner of operation of an activity.

6.3 Results of site-specific survey work

Table 6.3.1 below details the results of survey work undertaken.

Bray Head SAC		
Feature (* denotes priority habitat)	Status	Results
Vegetated Sea Cliffs of the Atlantic and Baltic coasts [1230]	QI/Annex I habitat (SAC)	The project footprint is directly adjacent to the boundaries of Bray Head SAC. The QI feature is not present within the project footprint, lacks a receptor, and is uphill of, or separated by slope from, the project footprint
European Dry Heath [4030]	QI/Annex I habitat (SAC)	The project footprint is directly adjacent to the boundaries of Bray Head SAC. The QI feature is not present within the project footprint, lacks a receptor, and is uphill of the project footprint

⁵ Natura 2000 data and maps <https://ec.europa.eu/environment/nature/natura2000>

7. Assessment of Likely Significant Effects on European Sites

The following assessment is in line with the structure detailed in 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 (EC, 2001).

7.1 Likely Direct, Indirect or Secondary Impacts

Table 7.1.1 indicates the likely impacts from the proposed activity on relevant European Sites (outlined in Table 6.2.1). Elements of the proposed project occur that are considered as having potential to give rise to a Likely Significant Impact (LSE) on a European Site.

Table 7.1.1 Likely Effect of the Proposed project on the European Sites

Size and Scale	Limited in extent (c. 7 ha) of amenity grassland lying outside the boundaries of the European Site
Land-take	No land take from the European Site
Distance from the European Sites or Key Features of the Site	< 0.1km at nearest point
Resource Requirements	None required from any European Sites
Emissions	Emissions within standard limits from vehicles and machinery may arise during the project. Some silt transfer from ground works and establishment may occur across limited areas of the site during rainfall. Any of these potential emissions are minimal and not relevant to the SAC due to the nature and location of the operations.
Excavation Requirements	No excavation from European Sites required. Construction will be contained within the project footprint
Transportation Requirements	Excavators and other construction vehicles. Access will be via existing roadways and the existing Raheen carpark
Duration of Construction, Operation, Decommissioning	This development is at planning stage. There is no confirmed construction schedule at this time but duration is likely to be short (weeks)
Cumulative Effects with other Projects or Plans	None – see Section 8 of this report

Table 7.1.1 indicates that the predicted direct, indirect or secondary impacts are not significant due to the nature of the proposed development.

Table 7.1.2 below provides an analysis of all qualifying interest features on the site in the context of their receptors and pathway, and a brief analysis of any works incurring a Likely Significant Effect (LSE).

Table 7.1.2 Analysis of relevant European sites/qualifying interests

Bray Head SAC			
Qualifying Interest or Feature (* denotes priority habitat)	Potential receptor/pathway	Analysis of likelihood of impact	LSE⁶
Vegetated Sea Cliffs of the Atlantic and Baltic coasts [1230]	No relevant pathway from the project footprint	No risk of likely significant impact. Operations within the project footprint are small-scale and low-key in nature on non-qualifying semi-natural amenity grassland. The project footprint is outside of the boundaries of the SAC and lacks a relevant pathway between the SAC and its QI features.	NO
European Dry Heath [4030]	No relevant pathway from the project footprint		NO

All sites (Site integrity)			
Qualifying Interest or feature	Receptor/pathway	Analysis of likelihood of impact	LSE
Site integrity ⁷	Permanent removal or destruction of key features which support QI	<p>The project is small-scale and has only minor groundworks on non-qualifying habitats. There is no existing receptor that is relevant to the project footprint</p> <p>Improvement of amenities of the project footprint, including implementation of a wildflower meadow and native tree planting, may have a positive impact on the integrity of the adjacent SAC over time as these habitats are likely to increase the area of seminatural habitats in the wider area and thus compliment habitats on the SAC.</p>	NONE

⁶ Likely significant adverse impact

⁷ Site integrity refers to the ecological context of the site as a whole including its constituent features which support designated qualifying interests, by definition in case law of ‘the lasting preservation of the constitutive characteristics of the site concerned that are connected to the presence of a priority natural habitat whose preservation was the objective justifying the designation of that site’ (See case C-258/11 Peter Sweetman, Ireland, Attorney General, Minister for the Environment, Heritage and the Local Government v An Bord Pleanala (Sweetman) at para 43; also Article 6(1) Habitats Directive’s reference to the ‘ecological requirements’ of designated features; and Commission Note on Setting Conservation Objectives for Natura 2000 Sites, 23/11/2012, p. 5, part 4, 2nd para)

7.2 Likely Changes to European Sites

Any potential changes to the European Sites are described in Table 5.3.

Table 7.2.1 Likely Changes to European Sites

Reduction of Habitat Area	No proposed reduction of qualifying habitats on any relevant European Site
Disturbance to Key Species	No disturbance to key species expected. The project footprint and its surroundings already experience high levels of human disturbance. Disturbance from construction will be short-term and are not expected to impact the QI features of the SAC
Habitat or Species Fragmentation	No fragmentation of key habitats or species anticipated. Operations are contained within the project footprint
Reduction in Species Density	No reduction in species density at the European Site
Changes in Key Indicators of Conservation Value	None anticipated. Improved management at the project footprint may lead to a small net benefit for the SAC over time
Climate Change	The site is predicted not to be significantly impacted by the proposed project. While climate change may affect the site in the long term through changes to species distribution or habitat composition this will not be exacerbated or accelerated by this project

Improvement of the project footprint as a recreational and biodiversity amenity may have a net positive impact on the site integrity of the adjacent SAC over time.

- The creation of a new surfaced trail here may reduce numbers of people utilising off-road tracks within parts of the adjacent woodland and parts of the SAC, helping to reduce footfall impacts on the SAC.
- The addition of wildflower meadows and native tree planting may act as an extension to the native woodland within the SAC, benefiting the site integrity by creating more buffer habitat and positive ecological linkages.
- The addition of improved amenities at the project footprint, including benches and an access ramp, may help to increase appreciation of the site as an area of conservation and biodiversity importance by the local community that utilise it. This may be significant given the close proximity of the SAC to a large urban town.

8. Effect of the Project in Combination with Other Plans or Projects

The small-scale nature and contained footprint of the project means it is unlikely to interact with or combine with other plans or projects to create significant impacts. For this to occur a plan or project would need to be active on the same site either permanently, or for a duration which would cause the inability to remove materials from the site or cause prolonged disturbance over and above background pre-existing levels.

Key points in relation to potential in combination and cumulative effects:

- The project has a limited footprint (< c. 7 ha.)
- There is no pathway/receptor between the project footprint and the SAC or its QI features
- Improvement of amenities at the project footprint may contribute positively to the integrity of the SAC over time

An Bord Pleanála case search was carried out on applications lodged between 01/01/20 and 04/11/2022. Cases falling under the authority of Wicklow county council were reviewed. The search indicated that no other plans or projects of a nature or location which could, in combination with this plan, increase any impact risk to 'significant' within the zone of influence. Although Bray Head

9. Conclusions on Information Provided for Stage One Screening Assessment

9.1 Determination of whether a project or plan is directly connected with or necessary to the conservation management of any European sites

This plan does not form part of the activities to manage the European site for conservation, however it is not expected to impede the achievements of site conservation objectives for QI features. There may be an indirect net gain to the site integrity of the SAC as a result of the works.

9.2 Appraising the likely significant effects of the proposed project on relevant European sites

An analysis of the project and its potential to interact with or impact upon the relevant SAC qualifying interests is provided in Section 6. In light of the analysis provided here using all available information and in light of site-specific survey work, it is concluded that there will be no likely significant adverse impacts on the features of conservation interest or site integrity of the relevant European sites.

There is a high degree of certainty that the plan and its actions will be able to be operated as described.

Given the high degree of certainty and absence of significant risk to the EU sites, it is recommended that the precautionary principle need not be applied in this case.

In view of the analysis provided here it is recommended that this project is screened out for Appropriate Assessment.

Appendix 1 – Client Sketch

