

# Appropriate Assessment Screening Report

## Construction of Boardwalk on Greystones South Beach



for  
Wicklow County Council  
County Buildings, Station Road  
Whitegates, Wicklow Town

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## Document Control

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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 construction of a boardwalk on Greystones South Beach, Greystones, Co. Wicklow was prepared by Rozanne Bell and Alan Lauder of *Alan Lauder Consulting* 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 and site inspection as well as email correspondence with the Greystones District Municipal Engineer. A site visit was carried out on 16 August 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](http://www.osi.ie)
- Online data available on European sites as held by the National Parks and Wildlife Service (NPWS) from [www.npws.ie](http://www.npws.ie)
- Information on the status of EU protected habitats and species in Ireland (National Parks & Wildlife Service)
- Information gleaned from aerial photography of the project site provided by the client

## 4.2 Site specific survey work

A Preliminary Ecological Appraisal (PEA) on the project footprint and immediate area was prepared and submitted separately by *Alan Lauder Consulting*.

## 4.3 Authors Qualifications and Expertise

This report has been prepared by Alan Lauder, Owner/principal at Alan Lauder Consulting<sup>1</sup>.

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 30 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, coastal and grassland management specialist with over 30 years managing designated sites and nature reserves in Scotland and Ireland. His expertise include the survey and management of extensive sand dune systems in Ireland and Scotland, including sites in County Wicklow. He is also a highly experienced ornithologist with considerable, recognised expertise in woodland, wetland and upland bird ecology, mammal survey including otter and 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).

Rozanne Bell is Projects Officer with ALC since June 2020 and has supported completion of several AA Screening Reports concerning a range of habitats and various types of operation and developments. She lends support to field surveys and has contributed to documents such as Conservation Management Reports and Ecological and Tourism Plans for local authorities. She holds a Post-Graduate Certificate in Environmental Sustainability including modules on Wildlife Management and Conservation, Environmental Assessments and GIS.

## 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

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<sup>1</sup> More information at [www.Alanlauderconsulting.com](http://www.Alanlauderconsulting.com)

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.

## 5. Overview of Proposed Project and its Receiving Environment

### 5.1 Description of Proposed Project

The project relates to the proposed construction of a permanent boardwalk of c. 150m in length stretching north along the beach from the southern arch (adjacent to the Park and Ride area). The purpose of the proposed boardwalk is to improve general accessibility to the beach area and it will replace a stretch of existing temporary accessibility matting. The exact positioning of the boardwalk along the beach has not been decided so for the purposes of this report, it will be situated in front of the boundary wall to the existing South Beach promenade but no lower than the current accessibility matting. Subject to funding, there will be three access points to the boardwalk: 1) from the southern arch 2) from the ramped area of the South Beach promenade and 3) following the access point to the existing matting from the promenade. The boardwalk will be permanent in nature, constructed of recycled plastic material and fixed in place using plastic stakes driven into the sand. Minimal excavation will be required. A digger may access to beach during the construction phase.

Figure 1 below shows the proposed project footprint. It should be noted that the position shown is indicative only.

The project footprint is not situated within or adjacent to the boundaries of any European Site.



Figure 1: Project Footprint marked in red. Existing blue accessibility matting can also be seen

## 5.2 Description of the Receiving Environment

The Biodiversity Action Plan for Greystones, 2021<sup>2</sup> identifies the main habitats at Greystones South Beach as ‘a mosaic of shingle and gravel shores (LS1)<sup>3</sup>/Sand Shores (LS2)/ Shingle and Gravel Banks (CB1) with some areas of embryonic dune formation (CD1). At the rear of the beach a small ridge of marram dunes/dune grassland (CD2) is present.’

The receiving environment at the project footprint consists of Sand Shores. An area of embryonic dune formation extends through the proposed project area. The PEA which accompanies this AA Screening Report provides a more detailed assessment of the ecological features present in the immediate area.

Greystones South Beach faces directly East and is an exposed stretch of coastline stretching from an area of rocky shoreline to the north to the in-flow of the Three Trout Stream to the South. The proposed project footprint stretches from the southerly ‘second arch’ north along the main beach for c. 150m, in front of the existing retaining wall to South Beach promenade.

Greystones beach is an area of high recreational value and is used throughout the year with an obvious peak of activity during the Summer months. The orientation of the beach makes it particularly vulnerable to the effects of Easterly storms when the profile of the lower foreshore can change dramatically.

Figures 2 - 4 below show the receiving environment at the project footprint.



Figure 2: Area from the southern arch to the ramped area of the South Beach promenade

<sup>2</sup> Wilson, F., *Biodiversity Action Plan for Greystones (2021)*. Available at: [2021 Greystones Biodiversity Report - Greystones Tidy Towns](#)

<sup>3</sup> Habitat classifications according to Fossitt (2000)





*Figure 3: Looking down the line of existing accessibility matting North to South*



*Figure 4: Area of Marram Grass within project footprint*

## 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, 2010<sup>4</sup>) 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:

1. Extremely small in total area (150m)
2. Is not situated within or adjacent to any European Site
3. The habitat within the project footprint is that of Sand shores (LS2) and Embryonic dunes (CD1)
4. The positioning of the proposed boardwalk is assumed to be above the normal high-water mark and should also be above most extreme high tide extents during exceptional storms.

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

## 6.2 Relevant European Sites and Qualifying Interests

Figure 5 below shows the Project Footprint in relation to European Sites which fall within a 15km radius. The closest European Sites to the Project Footprint are outlined in Table 1 below:

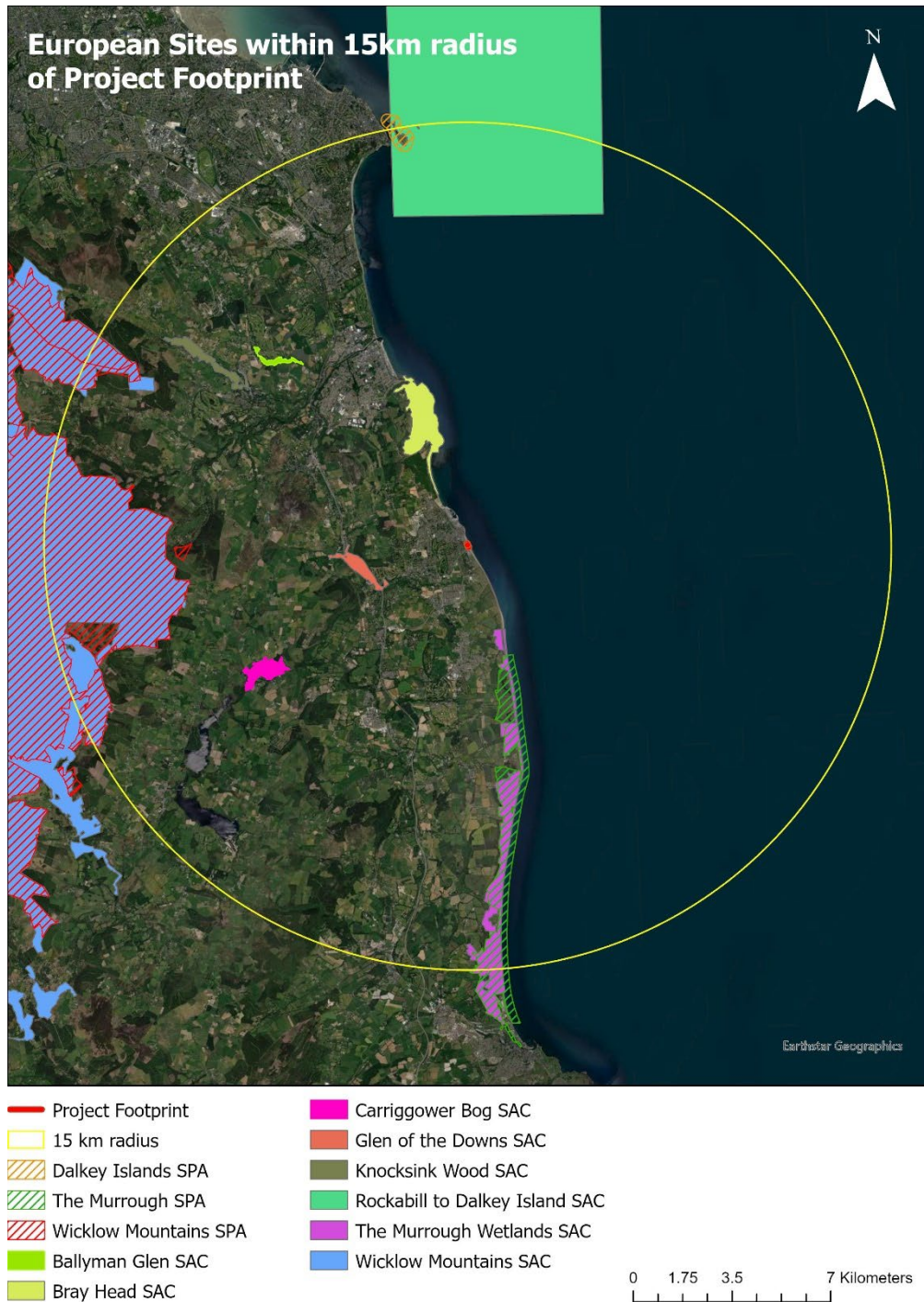


Figure 5: European Sites within 15km of Project Footprint

**Table 1: Nearest European Sites to the Project Footprint, qualifying interests and likely significant effects**

European Site:	Qualifying Interests	Source-Pathway-Receptor Link	LSE
Bray Head SAC [Site Code: 000714]  c. 2km (North)	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]  European dry heaths [4030]	There is no linkage or pathway between the project footprint and the European Site	NONE
Glen of the Downs SAC [Site Code: 000719]  c. 3km (West)	Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]	The Three Trout Stream, rising in Glen of the Downs SAC flows out to sea c. 800m south of the project footprint. Due to the distance and direction of flow, it is unlikely that this hydrological pathway presents any likely linkage between the project footprint and the European Site	NONE
The Murrrough Wetlands SAC [Site Code: 002249]  c. 3.2km (South)	Annual vegetation of drift lines [1210]  Perennial vegetation of stony banks [1220]  Atlantic salt meadows <i>Glauco-Puccinellietalia maritima</i> [1330]  Mediterranean salt meadows <i>Juncetalia maritimi</i> [1410]  Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davalliana</i> [7210]  Alkaline fens [7230]	There is no linkage or pathway between the project footprint and the European Site	NONE
The Murrrough SPA [Site Code: 004186]  c. 4km (South)	Red-throated Diver <i>Gavia stellata</i> [A001]  Greylag Goose <i>Anser</i> [A043]	There is no linkage or pathway between the project footprint and the European Site	NONE

	<p>Light-bellied Brent Goose <i>Branta bernicla hrota</i> [A046]</p> <p>Wigeon <i>Anas penelope</i> [A050]</p> <p>Teal <i>Anas crecca</i> [A052]</p> <p>Black-headed Gull <i>Chroicocephalus ridibundus</i> [A179]</p> <p>Herring Gull <i>Larus argentatus</i> [A184]</p> <p>Little Tern <i>Sterna albifrons</i> [A195]</p> <p>Wetland and Waterbirds [A999]</p>		
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Given the notes regarding the nature of the project (Section 5), its zone of influence (6.1) and the analysis of the closest European Sites (Table 1 above) there are no European sites considered to be of relevance.

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

The very 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 linear footprint (c. 150m)
- At its nearest point the Project Footprint is at c. 2km from the nearest European Site boundary
- There is no clear direct or indirect ecological pathway between the Project Footprint and any qualifying habitats or significant ecological receptors on a designated site.
- The project is permanent or semi-permanent in nature
- The project includes minimal excavation activities

- A search of the planning database of Wicklow County Council (on 25 August 2022)<sup>5</sup> indicated no other plans or projects of a nature or location which could, in combination with this project, increase any impact risk to ‘significant’ within the zone of influence.

## 8.1 Conclusions on Information Provided for Stage One Screening Assessment

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

This project does not form part of the activities to manage any site for conservation but does not impede the achievement of those objectives.

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

No relevant European Sites were identified and therefore there are no likely significant effects on any qualifying interests or on the integrity of any European Site.

There is a high degree of certainty that the project will be able to be operated as described to ensure no impact on the designated site and further project supervision will be by a qualified ecologist attending during construction and takedown to monitor and advise where required.

Given the high degree of certainty and absence of significant risk to any 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.**

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<sup>5</sup> <https://www.eplanning.ie/WicklowCC/searchresults/Default/10>

Appendix 1 – Annotated Aerial Image provided by Client



**Figure 1: Works location on South Beach**