

AtkinsRéalis



Appropriate Assessment Screening

Wicklow County Council

June 2026

0122987DG0002

GREYSTONES PEDESTRIAN CYCLE IMPROVEMENT SCHEME

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1. Introduction

AtkinsRéalis was commissioned by Wicklow County Council to prepare an Appropriate Assessment (AA) Screening Report for the Greystones Pathfinder Project – Greystones Pedestrian and Cyclist Improvement Scheme.

1.1 Background

The Greystones Pathfinder Project – Greystones Pedestrian and Cyclist Improvement Scheme has been identified as a priority project by WCC in the Greystones area. This new and improved active travel infrastructure will connect to public transport links including local bus services and the Greystones DART station as well as local services and amenities and residential areas. The aim of the scheme is to provide safe and attractive active travel infrastructure to encourage greater use of sustainable travel modes for trips to work, education, and for recreation and therefore the objectives of the scheme are:

- To provide new and *improved* pedestrian and cyclist infrastructure to connect to public transport links including local bus services and the Greystones DART station;
- To improve existing facilities and provide new facilities for pedestrians and cyclists within Greystones and environs along the route of the Proposed Scheme to the appropriate level and quality;
- To maintain an appropriate level of provision for other road users;
- To improve connectivity between Greystones town centre and Charlesland through a new connection through Burnaby Lawns and improved facilities on the L1221 Charlesland Dual Carriageway;
- To improve sustainable transport linkage to the town centres, schools, shops, services, housing estates, and recreation attractions in the area; and
- To tie into a future connection south of Charlesland to provide a future active travel connection from Greystones to Kilcoole.

The objectives of this project are in line with current national, regional and local policies to promote sustainable transport and encourage greater levels of cycling within our cities, towns and villages.



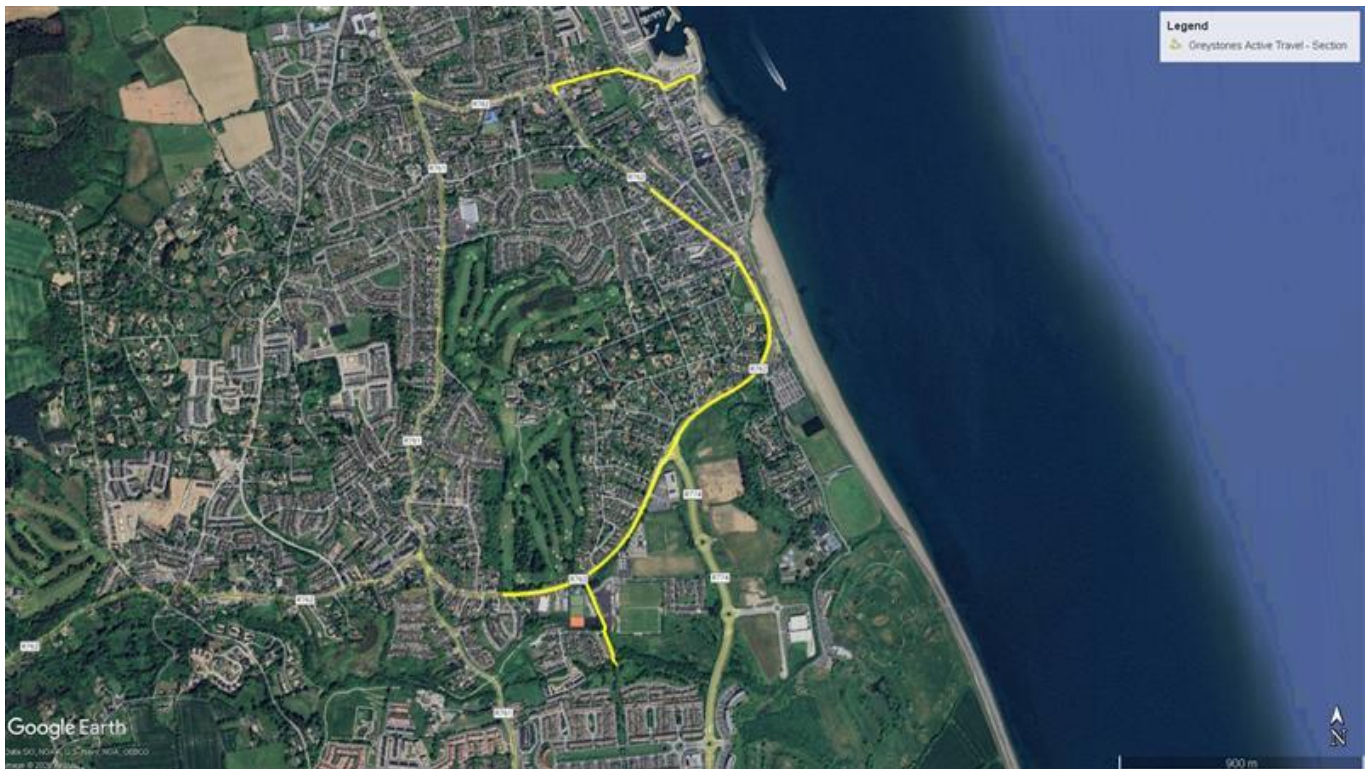


Figure 1-1 - Location of the Greystones Pathfinder Project - Greystones Pedestrian and Cyclist Improvement Scheme

1.2 Construction Methodology

The construction for the proposed scheme can be summarised as follows;

1.2.1 Cycle path Construction

Works will commence with the clearance and off-site removal of redundant road signage, boundary treatment, road surface materials and topsoil. The works will be undertaken using a combination of operatives using hand tools, mechanical excavators and dumper trucks. To facilitate the main works, underground utilities which conflict with the main works will be uncovered using mechanical excavators and hand digging where appropriate. The need for significant utility diversions is not envisaged as part of the works; instead a 'lower and protect' approach will be favoured. This is likely to be restricted to locations where the walking and cycling facilities cross or interface with public roads.

Following the diversion of utilities, the initial pavement and cycle track construction phase will be undertaken. This will include the excavation and removal of the existing stone, soil, concrete and bitumen materials along the route followed by the installation of new path and track base materials. Excavations will be largely undertaken by mechanical means, with any spoil arisings to be removed off site or reused locally where testing confirms its suitability. The proposed scheme involves an anticipated maximum excavation depth of 500mm below ground level to facilitate the base layers for the proposed footpaths / pavements and the ducting for the signalling associated with the scheme. The base layers of the pavement and track are to be made of compacted stone materials.

The works will also involve constructing the civil engineering elements required to facilitate the commissioning of the traffic signals and the public lighting elements at the latter stages of construction. Service chambers and underground duct sets will be laid within trenches and backfilled with granular material. Signal poles and public lighting columns will be erected, and ducting connections will be made to the base of each pole unit. Following completion of the

lighting elements, the final pavement surface course will be laid using an asphalt paving machine followed by compaction using a vibrating roller.

1.2.2 Road Resurfacing

The scheme also involves the resurfacing of the roadways and painting of new road markings within the scheme footprint. The existing road surface course layer will be planed-out throughout the entire scheme extents with planings being removed off site. The planed-out area will be replaced with Hot Rolled Asphalt (HRA) or Stone Mastic Asphalt (SMA) surface course ca. 40mm - 60mm thick. Additional to this, and where required, additional bituminous layers may be replaced in localised areas where there is evidence of pavement failure. It is not envisaged that the foundations layers (i.e. sub-base or capping) will require replacement. Following road resurfacing new road markings will be painted on road surfaces.

1.2.3 Footpath Construction

The construction of the cycleway will also involve relocation and installation of footpaths and kerbs adjacent to the cycleway. Footpaths will be constructed similar to the cycleway; excavation of existing footpath with materials removed off site to a licenced waste facility, excavations along footpath alignment to depths of maximum 500mm, infill of footpath subbase materials (compacted stone) and the pouring of concrete footpaths in shuttered sections. A ca. 60mm upstand insitu concrete kerb will also be installed along the footpath edge.

1.2.4 Drainage Alterations

Drainage works, which will run in tandem with the pavement construction phase, are considered to be minimal and restricted to areas where the scheme interfaces with the public road. The drainage works at these locations are limited to the relocation of existing road gullies with the larger existing road drainage infrastructure (i.e. carrier drains) not being altered or adjusted. During these works the main carrier drains will be isolated / blocked off from works activities / work zones to facilitate the relocation of drainage gullies.

Typically, drainage will be provided using new gullies (relocated to alongside the proposed kerb positions) connecting to the existing surface water drainage infrastructure / main carrier drain. The new footpaths and cycle tracks will generally slope towards the road in order to minimise the need for additional drainage collection measures specific for these facilities. Alternatively, and where the proposed scheme results in a marked increase in catchment area (due to an increased hard-standing area), sections of footway and/or cycle track will be constructed using either porous surfacing; or where appropriate, the cross-fall will fall towards an adjacent grass verge (thus not discharging into the surface water network).

1.2.5 Verge Reinstatement

For soft landscaping areas topsoil profiles will be graded to tie into the new pavement levels followed by grass seeding. The top soiling and seeding will be undertaken using a combination of mechanical excavator, tractor unit drawing a rotavator / rake / seed spreader and also operatives using hand tools for areas where machinery access is unavailable.

There will be no additional demolition works associated with this scheme.

1.2.6 Traffic Management

The construction of the cycleway will be carried out in short segments (ca.100-200m in length) on one side of the roadway at a time to allow for continued traffic flow and will progress along the roadways, as such individual work zones will be relatively small.



1.2.7 Junctions

All junctions along the scheme will be segregated. This will feature cyclists passing through the junction on their own cycle tracks with dedicated traffic signal phases which are separate to the vehicular phasing and separate to the pedestrian phasing (where applicable). The proposed junctions are to include kerb upstands throughout (except at crossing points), providing vertical segregation and thereby increasing protection to the cycle tracks.

1.2.8 Bridge Crossing

The proposed bridge will be a prefabricated bridge which will accommodate the width required, and will be installed on piled foundations set back from the edge of the watercourse / masonry wall banks to remove the need for instream works. The steel bridge and steel parapets will be prefabricated off site in factory conditions. Required machinery (Pile Rig, Excavator, Crane, etc.,) will be mobilised and pile locations will be set out which will be designed to be at a setback distance from the existing riverbanks to negate the necessity for instream works. Works will only be undertaken during a period of dry weather. The cast in-situ bored reinforced concrete piles will be constructed at the two abutment locations with the use of temporary steel guide casings. Preparation of the ground for the construction of pile caps and abutment will take place before the reinforced pile caps and abutments are constructed at both ends. Ahead of delivery to site of the prefabricated steel bridge superstructure, the existing bridge deck will be dismantled without removal or damage to the existing masonry walls or abutments. The bridge will then be placed in situ following which the aluminium bridge deck will be delivered to site and installed. Once the deck has been installed, the steel bridge super structure will be lifted into place using a crane. Following installation of the main bridge structure, parapets (bridge railings) will be delivered and installed ahead of the installation of the necessary final bridge finishes. The steel bridge superstructure will be lifted into place using a crane following which the aluminium bridge deck will be delivered to site and installed. Following installation of the main bridge structure the parapets (bridge railings) will be delivered and installed ahead of the installation of the final bridge finishes.



Figure 1-2 - Example Bridge Construction

1.2.9 Site Compound

It will be the responsibility of the Contractor to determine a suitable location for the site compound within the proposed development area, but away from any identified environmental sensitive receptors (watercourses, designated sites etc). Parking for operatives will be at the main compound only. Operatives will be transported from the compound to the works area. No parking will be allowed within the temporary works area or on-street.

2. Scope of Study

2.1 Legislative Context

2.1.1 Natura 2000

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (“the Habitats Directive”) is a legislative instrument of the European Union (EU) which provides legal protection for habitats and species of Community interest. Article 2 of the Directive requires the maintenance or restoration of such habitats and species at a favourable conservation status, while Articles 3 to 9, inclusive, provide for the establishment and conservation of an EU-wide network of special areas of conservation (SACs), known as Natura 2000, which also includes special protection areas (SPAs) designated under Article 4 of Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (“the Birds Directive”). Both SACs and SPAs are commonly referred to as “European sites” or “Natura 2000 sites”.

SACs are selected for natural habitat types listed on Annex I to the Habitats Directive and the habitats of species listed on Annex II to the Habitats Directive. SPAs are selected for species listed on Annex I to the Birds Directive, other regularly occurring migratory species and other species of special conservation interest. The habitats and species for which a Natura 2000 site is selected are referred to as the “*qualifying interests*” of that site and each is assigned a “*conservation objective*” aimed at maintaining or restoring its “*favourable conservation condition*” at the site, which contributes to the maintenance or restoration of its “*favourable conservation status*” at national and European levels.

2.1.2 Appropriate Assessment

Article 6 of the Habitats Directive deals with the management and protection of Natura 2000 sites. Articles 6(3) and (4) set out the decision-making process, known as “*Appropriate Assessment*” (AA), for plans or projects in relation to Natura 2000 sites. Article 6(3) states: -

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

The first sentence of Article 6(3) provides a basis for determining which plans and projects require AA, i.e., those “*not directly connected with or necessary to the management of [one or more Natura 2000 sites] but likely to have a significant effect thereon, either individually or in combination with other plans or projects*”.

In Waddenzee (C-127/02), the Court of Justice of the European Union (CJEU) ruled that significant effects must be considered “*likely*” if “*it cannot be excluded, on the basis of objective information*”, that they would occur. This clearly



sets a low threshold, such that AA is required wherever there is a reasonable possibility of significant effects on a Natura 2000 site. In the same judgment, the CJEU established that the test of significance relates specifically to the conservation objectives of the site concerned, i.e., “significant effects” are those which, “in the light, inter alia, of the characteristics and specific environmental conditions of the site”, could undermine the site’s conservation objectives.

In addition to the effects of the plan or project on its own, the combined effects arising from the plan or project under consideration and other plans and projects must also be assessed (see Section 5.4 for more details).

The last part of the first sentence of Article 6(3) defines AA as an assessment of the “implications [of the plan or project] for the site in view of the site’s conservation objectives”. In the second sentence, Article 6(3) requires that, prior to agreeing to a plan or project, the competent authority must “ascertain” that “it will not adversely affect the integrity of the site concerned”. In *Sweetman v. An Bord Pleanála* (C-258/11), the CJEU ruled that a plan or project “will adversely affect the integrity of that site if it is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site in the list of sites”. On that basis, EC (2018) described the “integrity of the site” as “the coherent sum of the site’s ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated”. As such, the “integrity” of a specific site is defined by its conservation objectives and is “adversely affected” when those objectives are undermined. In *Waddenzee*, the CJEU ruled that the absence of adverse effects can only be ascertained “where no reasonable scientific doubt remains”.

The “precautionary principle” applies to all of the legal tests in AA, i.e., in the absence of objective information to demonstrate otherwise, the worst-case scenario is assumed. Where the tests established by Article 6(3) cannot be satisfied, Article 6(4) applies (see explanation in Section 2.2 below).

2.1.3 Competent Authority

The requirements of Articles 6(3) and (4) are transposed into Irish law by, inter alia, Part 5 of the European Communities (Birds and Natura Habitats) Regulations, 2011 (as amended) (“the Habitats Regulations”) and Part XAB of the Planning and Development Act, 2000 (as amended) (“the Planning and Development Acts”). As per the second sentence of Article 6(3), it is the “competent national authorities” who are responsible for carrying out AA and, by extension, for determining which plans and projects require AA. The competent authority in each case is the body responsible for authorising a plan or project, e.g. local or other public authorities (including TII), An Bord Pleanála, the Environmental Protection Agency (EPA) or a Government Minister. In all cases, it is the competent authority who is ultimately responsible for determining whether or not a plan or project requires AA and for carrying out the AA, where required.

2.2 Appropriate Assessment Process

The AA process can be described as being made up of three distinct stages, as described below, the need to progress to each stage being determined by the outcome of the preceding stage.

Stage 1: Screening – This stage involves a determination by the competent authority as to whether or not a given plan or project required AA. As explained in Section 2.1, AA is required in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site, but for which the possibility of likely significant effects on one or more Natura 2000 sites cannot be excluded. The CJEU’s Judgment on *Eco Advocacy v. An Bord Pleanála* (C-721/21) and the *Opinion* of Advocate General Kokott in the same case set out the principles for identifying any aspects of a plan or project which may constitute what the CJEU termed in *People Over Wind* (C-323/17) “measures intended to avoid or minimise harmful effects on a Natura 2000 site” and, as such, cannot be taken into account in making an AA Screening determination. Consideration of the potential for in-combination effects is also required at this stage.



Stage 2: Appropriate Assessment – This stage involves a detailed assessment of the implications of the plan or project, individually and in combination with other plans and projects, for the integrity of the Natura 2000 site(s) concerned. This stage also involves the development of appropriate mitigation to address any adverse effects and an assessment of the significance of any residual impacts following the inclusion of mitigation. In *Kelly v. An Bord Pleanála* (IEHC 400), the High Court ruled that a lawful AA must contain complete, precise, and definitive findings based on examination and analysis, and conclusions and a final determination based on an evaluation of the findings. In the same judgment, the High Court stressed that, in order for the findings to be complete, precise, and definitive, the AA must be carried out in light of best scientific knowledge in the field and cannot have gaps or lacunae. In *Holohan v. An Bord Pleanála* (C-461/17), the CJEU clarified that AA must “*catalogue the entirety of habitat types and species for which a site is protected*” (i.e. the qualifying interests of the site) and assess the implications of the plan or project for the qualifying interests, both within and outside the site boundaries, and other, non-qualifying interest habitats and species, whether inside or outside the site boundaries, “*provided that those implications are liable to affect the conservation objectives of the site*”. The proposer of a plan or project requiring AA is furnishes the competent authority with the scientific evidence upon which to base its AA by way of a Natura Impact Statement (NIS) or Natura Impact Report (NIR). If it is not possible to ascertain that the plan or project will not adversely affect one or more Natura 2000 sites, authorisation can only be granted subject to Article 6(4).

Stage 3: Article 6(4) – If a plan or project does not pass the legal test at Stage 2, alternative solutions to achieve its aims must be considered and themselves subject to Article 6(3). If no feasible alternatives exist, authorisation can only be granted where it can be demonstrated that there are imperative reasons of overriding public interest (IROPI) justifying its implementation. Where this is the case, all compensatory measures must be taken to protect the overall coherence of Natura 2000.

The three stages described above are illustrated in Figure 2-1 below.

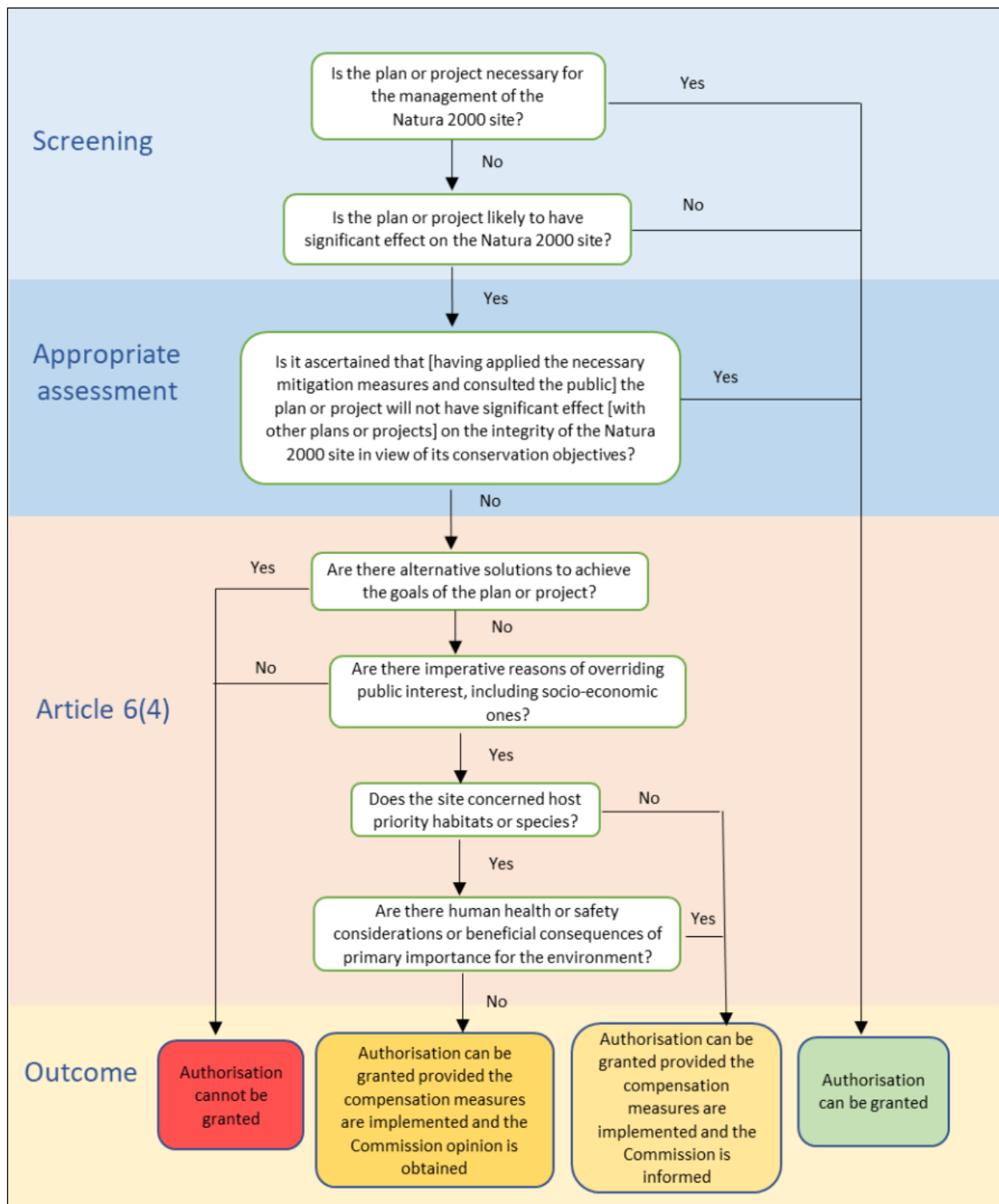


Figure 2-1 - Stages of the Appropriate Assessment process (EC, 2021a)

3. Methods

3.1 Guidance documents

The Screening for Appropriate Assessment was prepared with reference and due consideration to the following documents, guidelines and case law, including but not limited to: -

- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna. *Official Journal of the European Communities* L 206/7-50.
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. *Official Journal of the European Union* L 20/7-25.
- European Communities (Birds and Natural Habitats) Regulations, 2011. *S.I. No. 77/2011* (as amended) (“the Habitats Regulations”).
- Planning and Development Act, 2000. *No. 30 of 2000* (as amended) (“the Planning and Development Acts”).
- Planning and Development Regulations, 2001. *S.I. No. 600/2001* (as amended) (“the Planning Regulations”).
- EC (2019). *Managing Natura 2000 sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC*. European Commission, Brussels. *Official Journal of the European Union* C 33/1-62.
- EC (2021a). *Assessment of plans and projects in relation to Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC*. European Commission, Brussels. *Official Journal of the European Union* C 437/1-107.
- EC (2021b) *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive*. C(2021) 7301. European Commission, Brussels.
- DG Env (2022) *Guidance document on assessment of plans and projects in relation to Natura 2000 sites – A summary*. Directorate-General for Environment, European Commission, Brussels. Publications Office of the European Union, Luxembourg.
- DEHLG (2010a) *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Revised 11/02/2010*. Department of the Environment, Heritage and Local Government, Dublin.
- DEHLG (2010b) *Circular NPW 1/10 & PSSP 2/10. Dated 11/03/2010*. Department of the Environment, Heritage and Local Government, Dublin.
- NPWS (2012) *Marine Natura Impact Statements in Irish Special Areas of Conservation. A Working Document. April 2012*. National Parks & Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- NPWS (2021) *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland. National Parks & Wildlife Service Guidance Series 1*, Department of Housing, Local Government and Heritage, Dublin.
- Mullen, E., Marnell, F. and Nelson, B. (2021) *Strict Protection of Animal Species – Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority. National Parks & Wildlife Service Guidance Series 2*, Department of Housing, Local Government and Heritage, Dublin.
- OPR (2021) *Appropriate Assessment Screening for Development Management*. OPR Practice Note PN01. Office of the Planning Regulator, Dublin.
- Case law, including *Waddenzee* (C-127/02), *Sweetman v. An Bord Pleanála* (C-258/11), *Kelly v. An Bord Pleanála* (IEHC 400), *Commission v. Germany* (C-142/16), *People Over Wind* (C-323/17), *Holohan v. An Bord Pleanála* (C-461/17), *Eoin Kelly v. An Bord Pleanála* (IEHC 84), *Heather Hill* (IEHC 450) and *Eco Advocacy v. An Bord Pleanála* (C-721/21).
- Sundseth, K. and Roth, P. (2014) *Article 6 of the Habitats Directive – Rulings of the European Court of Justice*. Ecosystems LTD (N2K Group), Brussels.



3.2 Desk Study

Baseline data regarding the receiving environment, including Natura 2000 sites, was gathered through a thorough desk study.

The boundaries of Natura 2000 sites were downloaded from *NPWS: Maps and Data* <<https://www.npws.ie/maps-and-data>>. Information on sites, including their overall structures and functions, qualifying interests, conservation objectives and threats/pressures and activities therein, was found in the Site Synopsis, Natura 2000 Standard Data Form, Conservation Objectives and supporting documents for each site. Spatial data for site-specific conservation objectives of Natura 2000 sites, and boundary data for other designated sites, such as Natural Heritage Areas, was also retrieved from *NPWS: Maps and Data*. Reporting under Article 17 of the Habitats Directive (NPWS, 2019a-c; *Article 17 web tool*) and Article 12 of the Birds Directive (NPWS, 2024c; *Article 12 web tool*) provided further information on the habitats and species concerned at the national level.

Information relating to recent and historical records of species was obtained from the National Biodiversity Data Centre (NBDC) *Biodiversity Maps* <<https://maps.biodiversityireland.ie/Map>>.

The Environmental Protection Agency (EPA) map viewer *EPA Maps (Water)* <<https://gis.epa.ie/EPAMaps/Water>> and spatial data for river, lake, canal, transitional and coastal waterbodies downloaded from the *EPA Geoportal* <<https://gis.epa.ie/GetData/Download>> was used to identify any hydrological connection between the proposed works and Natura 2000 sites or connected features. Satellite and aerial imagery from Google Earth, Bing Maps and Tailte Éireann was reviewed to identify hedgerows, treelines and other potential ecological features.

In order to inform the assessment of potential in-combination effects, planning applications from the surrounding area were reviewed using the National Planning Application Database, An Coimisiún Pleanála's online map viewer and the EIA Portal.

Information from the aforementioned data sources was last accessed 05/03/2026.

3.3 Statement of Authority

The Screening for Appropriate Assessment report was prepared by Kevin Coogan, Daniel Blake and Colin Wilson. Owen O'Keefe/Paul O'Donoghue/ Kevin McCaffrey provided peer review and support.

Niamh Kelly (AtkinsRéalis) holds a BSc (Hons) in Environmental Science with Ecology from Atlantic Technological University Sligo. She has experience in ecological surveying through aquatic and terrestrial fieldwork and vegetation identification with Teagasc. She has volunteered as a warden for the Little Tern colony at Baltray and contributed to the All Ireland Daubenton's Bat Waterways Survey. Niamh collated background information for this assessment. She supports the preparation of AA Screening Reports, NIS, Environmental Impact Assessment (Biodiversity Chapters), Constraints Assessments, Feasibility Reports and MCAs. Niamh conducts research, site surveys, habitat classification (Fossitt), terrestrial mammal activity and assisting with bat emergence and activity surveys.

Kevin Coogan (AtkinsRéalis) has a BSc (Hons) in Zoology from University College Dublin. He has developed ecological surveying skills through country-wide small river sampling experience, as well as habitat evaluation experience in Spain and Ireland. He has volunteer experience in bird surveying on North Bull Island SPA and Ireland's Eye SPA. Kevin collated background information for this assessment.

Daniel Blake (AtkinsRealis Dublin) has a degree in Wildlife Biology and has been working in the environmental consultancy sector for the past six years. He has worked in both large scale government infrastructure projects as well as domestic projects across the UK and Ireland conducting both environmental and ecological roles. Primarily conducting protected species surveys such as bats, badgers, birds, reptiles, small mammals and amphibians as well as invasive species surveys. He has also earned a Natural England licence for the survey of Great crested newt. He



has been involved in habitat surveying and assisted in the writing of Appropriate Assessments, Preliminary ecological appraisals and protected species reports. Throughout his career he has acted as an ECoW for numerous sites to ensure environmental laws and practices are met. He has been involved in water and soil sampling surveys, levelling surveys and creation of hibernaculum. Daniel undertook field surveys and for the proposed development assisted with the collation of background information to inform this report.

Colin Wilson (Atkins Dublin) has a BSc (Hons) in Environmental Science and is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). He has over 16 years working in the fields of ecology and environmental management. He is a Senior Ecologist with experience in ecological surveying, environmental assessment, on-site ecological supervision and mitigation. He has experience on multiple infrastructure projects regarding all elements of surface and groundwater management, monitoring, sampling and associated reporting. Colin also has a broad range of experience in invasive species management, biosecurity and control. Colin has prepared AA screening reports, Natura Impact Statements and has also been involved in the development of Environmental Operating Plans and Construction Environmental Management Plans for a number of national infrastructure projects. Colin is the author of this report.

Owen O'Keefe is a Senior Ecologist at AtkinsRéalis. He holds a BSc (Hons) in Ecology from University College Cork (2015) and is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). He has 8 years' professional experience in ecological consultancy, including extensive experience in Appropriate Assessment. He has prepared a large number of AA Screening Reports and Natura Impact Statements, as well as carried out technical appraisals of such reports for competent authorities. Owen undertook the peer review of this report.

Paul O'Donoghue has a BSc (Zoology), MSc (Behavioural Ecology) and a PhD in avian ecology and genetics. Paul is a chartered member of the Society for the Environment (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Paul has over 18 years' experience in ecology; including extensive experience in the preparation of Habitat Directive Assessments / Natura Impact Statements (i.e. Appropriate Assessment under Article 6(3) of the EU Habitats Directive). Paul carried out the technical review of this report.

Kevin Mc Caffrey (Atkins Galway) has a BSc (Hons) in Applied Freshwater and Marine Biology and a MSc in Environmental Sustainability. He is a Senior Ecologist with over 10 years' experience in freshwater and marine ecology, environmental surveying, impact assessment and as an Ecological clerk of Works. He has prepared and reviewed a wide range of technical reports including Environmental Impact Assessment, AA screening, Natura Impact Assessment and sanitary surveys. Kevin provided peer review and support for this assessment.



4. Existing Environment

4.1 General Overview

The proposed scheme is located within Greystones town and predominantly follows existing urban infrastructure, with most of the route situated along hardstanding surfaces such as roads and pedestrian pathways. A short section at the southern extent of the scheme traverses an area of amenity grassland within the Burnaby Lawns housing estate. The scheme also includes the construction of a bridge crossing over the Three Trouts Stream, which flows eastwards and outfalls to the Irish Sea.

4.2 Designated Sites

Natural Heritage Area (NHA) is the basic designation for wildlife sites. These sites are considered to represent important habitats for species of plants and animals whose habitat needs protection¹. These sites are protected under the Wildlife Amendment Act (2000)².

Additionally, proposed Natural Heritage Areas (pNHA) are those which have been published on a non-statutory basis, and have yet to be statutorily designated. These sites are of significance to flora, fauna, and their respective habitats. These sites will be designated on a phased basis over the coming years. Prior to designation pNHAs are subject to limited protection³.

There are no NHAs within the vicinity of the proposed scheme. The nearest NHA is Skerries Islands NHA located c. 46km north of the proposed scheme.

There are several pNHAs within the vicinity of the proposed scheme. The nearest is Bray Head pNHA, located approximately c. 950 m north of the site. The Murrough pNHA lies approximately c. 1.6 km south of the proposed scheme and may have potential hydrological connectivity via the Three Trouts Stream; however, due to dilution, dispersal, and attenuation processes within the Irish Sea, no likely significant effects to this pNHA are anticipated. Refer to Figure 4-1 below for the locations of pNHAs in relation to the proposed scheme.

¹ [Natural Heritage Areas \(NHA\) | National Parks & Wildlife Service](#)

² [Wildlife \(Amendment\) Act, 2000 | National Parks & Wildlife Service](#)

³ [Natural Heritage Areas \(NHA\) | National Parks & Wildlife Service](#)

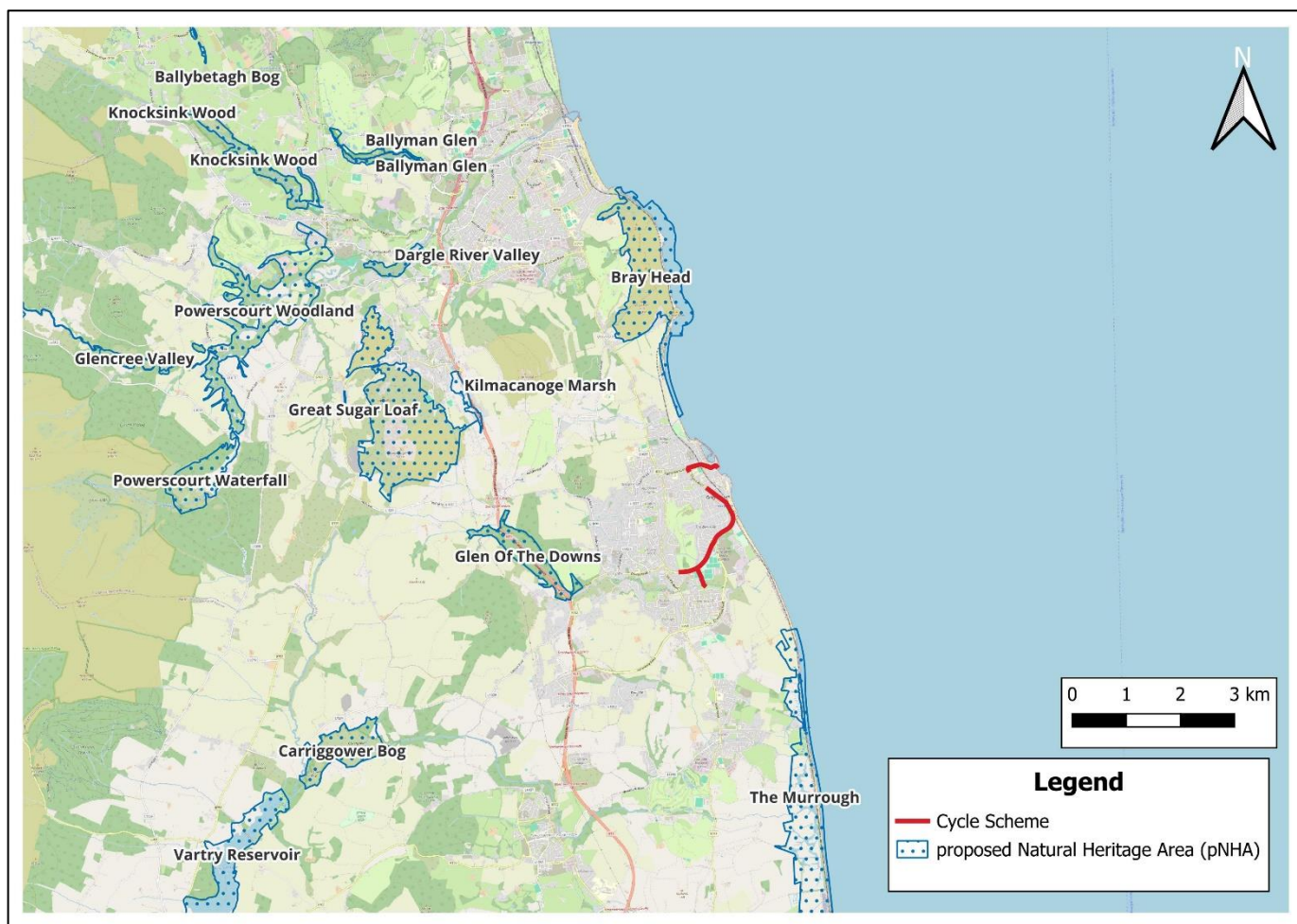


Figure 4-1 - proposed Natural Heritage Areas (pNHA) near the proposed scheme.

4.3 Annex I Habitats

Annex I habitats were reviewed in the context of the proposed scheme. These are habitats listed on Annex I to the Habitats Directive and for which Member States must designate SACs. The overall objective of the Habitats Directive is to achieve and maintain favourable conservation status for all habitats and species of community interest; and to contribute towards maintaining biodiversity of natural habitats and of wild flora and fauna in member states. To this end, EU member states are obliged to monitor the conservation status of habitats and species. As all habitats (as listed in Annex I) and species of Community interest are included, the monitoring requirements obliged to be undertaken by member states is not restricted to European sites (SACs and SPAs) but encompasses the total national resource of each habitat. Consequently, data on Annex I habitat must be collected both within and outside the Natura 2000 network. In addition, member states are obliged, as detailed in Article 17 of the Habitats Directive, to report to the EU commission every six years on the implementation of measures taken towards meeting the objectives of the directive. Annex I habitats are categorised into the following general habitat categories: - Bogs, mires and fens, Coastal habitats, Dune habitats, Forests, Freshwater habitats, Grasslands, Heath and scrub and Rocky habitats.

A review of NPWS Article 17 datasets⁴ (last accessed 03/03/2026) identified Annex I Tidal Mudflats and Sandflats alongside the proposed scheme. There is indirect connectivity to this habitat from the proposed scheme via the Three

⁴ <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17> - It is acknowledged that this is not a definitive list as the NPWS datasets are incomplete

Trouts Stream. However, no meaningful adverse effects are anticipated on this Annex I habitat given the absence of in-stream works and the c. 1.5 km downstream separation. See Figure 4-2 below.



Figure 4-2 - Annex I Habitats adjacent to proposed scheme.

4.4 Surface Water Features

The Water Framework Directive (WFD), Directive 2000/60/EC, was adopted in 2000 as a single piece of legislation covering rivers, lakes, groundwater and transitional (estuarine) and coastal waters. Its objectives include the attainment of good status in water bodies that are of lesser status at present and retaining good status or better where such status exists at present (EPA, 2023). Status relates to the condition of the water in the waterbody as defined by its chemical status and its ecological status, whichever is worse.

The proposed scheme has 1 no. watercourse crossing; Three Trouts Stream. This watercourse is crossed by the route along a proposed unconstructed bridge. Refer to Figure 4-3 below for the project's interaction with the watercourse. The Three Trouts Stream flows in an easterly direction to the Irish Sea approximately c. 1.5km downstream close to Greystones south beach/golf course.

The Three Trouts Stream is an Order 2 river with a moderate Q-Value of 3-4 (2024). River Waterbody Status outlined by WFD for 2019–2024 lists the Three Trouts Stream as having 'Moderate' status. The latest WFD River Waterbodies Risk monitoring data for 2019–2024 classifies the Ecological status/potential of the Three Trouts Stream as 'Not at risk', with 'Moderate' status for Invertebrates, 'Pass' status for Supporting Chemistry Conditions, 'Moderate' status for Nitrogen conditions and 'High' status for Phosphorous conditions.



Figure 4-3 - Surface water Features

4.5 Groundwater Body

The proposed scheme is located within the Wicklow (Code: IE_EA_G_076) groundwater body (GWB). This GWB is of 'Good' WFD status. The proposed scheme is underlain by a poor aquifer with bedrock which is generally unproductive except for local zones. The groundwater vulnerability beneath the route is of 'High', 'Moderate' and 'Low' vulnerability. This indicates that areas of 'High' vulnerability have shallow bedrock and are highly vulnerable to contamination.

4.6 Bird Sites

There is 1no. Irish Wetland Bird Survey (I-WeBS) site within a 5km radius of the proposed scheme: Greystones count site (Site Code: 0T905). Greystones count site is located on Greystones south beach, directly east of the proposed scheme.

Within Greystones count site, records of bird species from the past 2no. counting periods (2021/2022 and 2022/2023) listed on Annex I to the Birds Directive include; Sandwich tern (*Sterna sandvicensis*) and great northern diver (*Gavia immer*).

Records of red-listed bird species from the past 2no. counting periods (2021/2022 and 2022/2023) on the Birds of Conservation Concern in Ireland (BoCCI), other than those listed as Annex I species (above) include; Redshank (*Tringa tetanus*), purple sandpiper (*Calidris maritima*) and oystercatcher (*Haematopus ostralegus*).

Records of amber-listed bird species from the past 2no. counting periods (2021/2022 and 2022/2023) on the BoCCI, other than those listed as Annex I species (above) include; Turnstone (*Arenaria interpres*), herring gull (*Larus argentatus*), lesser black-backed gull (*Larus fuscus*), shag (*Phalacrocorax aristotelis*), ringed plover (*Charadrius hiaticula*), cormorant (*Phalacrocorax carbo*), mute swan (*Cygnus olor*), common gull (*Larus canus*), black-headed gull (*Larus ridibundus*) and light-bellied brent goose (*Branta bernicla hrota*).

No species were recorded here as being nationally or internationally important in the past 2no. counting periods.

Species recorded at Greystones count site which are also Qualifying Interest (QI) species of the Murrough SPA (Section 5) are as follows: light-bellied brent goose, black-headed gull and herring gull.

4.7 Species

A search of National Biodiversity Data Centre (NBDC) records was carried out on 04/03/2026 which included the proposed scheme route and a 100m buffer zone to capture mobile species in the surrounding environs. The following QI species of Special Areas of Conservation (SAC) or Special Protection Area (SPA) were found within the five-year period (2021–2026): Herring Gull (*Larus argentatus*), QI species of The Murrough SPA.

NBDC datasets do not identify any invasive plant species as having been recorded within the project site. No legally restricted invasive plant species have been recorded within or near the project site during site surveys.

5. Connectivity to Natura 2000 Sites

5.1 Source-Pathway-Receptor

Appropriate Assessment screening requires a clear and systematic evaluation of whether the scheme may give rise to likely significant effects on any Natura 2000 site. In line with current best practice, including the Office of the Planning Regulator's Practice Note PN01 (2021), the screening process is based on a source–pathway–receptor (SPR) model rather than reliance on predefined geographic distances or broad zones of influence.

Under the SPR model, the screening exercise identifies:

- **Sources** — the elements of the proposed scheme capable of exerting pressures or producing effects (e.g., emissions, habitat loss, noise, lighting, hydrological changes).
- **Pathways** — the mechanisms or connections through which an effect could be transmitted from the source to ecological receptors (e.g., surface water links, groundwater connectivity, air, disturbance pathways, functional ecological linkages).
- **Receptors** — the ecological features that could be affected, specifically the Qualifying Interests and Conservation Objectives of Natura 2000 sites.

Effects can only arise where all three components of the chain are present. If any one of the links; source, pathway, or receptor is absent or can be objectively ruled out, the potential for significant effects can likewise be excluded.

In establishing which Natura 2000 sites require consideration in AA Screening, the screening process therefore focuses on the existence or absence of viable pathways between the proposed scheme and the features for which each Natura 2000 site is designated. This approach reflects OPR (2021), which notes that reliance on arbitrary distance thresholds (e.g., 15km) is inappropriate unless supported by hydrological, ecological, or functional linkages.

Earlier guidance such as Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (DEHLG, 2010) identified three broad categories of sites that need to be included in screening. These remain relevant through the SPR approach:

1. Natura 2000 sites within or adjacent to the scheme area, where there is the potential for direct effects.
2. Natura 2000 sites connected by identifiable pathways, which may include hydrological networks, ecological corridors, or functional linkages for mobile species (e.g., feeding, roosting, or commuting habitats).
3. Any Natura 2000 sites where, applying the precautionary principle, the possibility of significant effects cannot be excluded, for example where hydrological connectivity extends throughout a river catchment or where mobile fauna associated with a Natura site may utilise habitats within or near the proposed scheme site.

The European Commission's (2021) guidance on Article 6(3) further emphasises the need to consider:

- Faunal mobility, whereby species of conservation interest may use areas outside the designated site and could be affected by changes in habitat, disturbance, or severance of ecological linkages.
- Connectivity within and between Natura 2000 sites, including whether a scheme could interrupt functional ecological pathways essential to the achievement of site conservation objectives.

By applying these principles, the screening process identifies all Natura 2000 sites with a potential for significant effects, while avoiding the unnecessary inclusion of sites where no such connections exist.

The proposed scheme does not lie within any Natura 2000 site nor is it adjacent to any Natura 2000 site.

The only potential connectivity from the proposed scheme to any Natura 2000 site is through the following pathway:



- Hydrological – effects from surface water quality.

Consideration has also been given to species which may occur at a distance from the SAC or SPA for which they are a Qualifying Interest (QI). For example, many SPA waterbird species have a wide geographical range, therefore, the mobility of QI waterbird species and their potential to range outside of the delineated boundaries of their respective Natura 2000 sites has also been considered as part of this assessment.

During the construction phase of the proposed scheme there is hydrological connection to The Murrough SPA via the Three Trouts Stream watercourse which outfalls to the Irish Sea.

Table 5-1 and Table 5-2 details all Natura 2000 sites considered in the source–pathway–receptor appraisal and indicate whether any connectivity to the proposed scheme exists. Figure 5-1 and Figure 5-2 illustrate the locations of the Natura 2000 sites included in this evaluation.

Due to potential hydrological connectivity from the Proposed scheme site, the following Natura 2000 site is subject to further assessment in Section 5.3; The Murrough SPA.

Table 5-1 - Special Areas of Conservation sites assessed for potential connectivity to the Proposed scheme

Site Name and Code	Approximate Distance from scheme location	Qualifying Interests	Connectivity
Bray Head SAC (000714) ⁵	950m N	▪ Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] ▪ European dry heaths [4030]	No. There is no direct overlap between the proposed scheme and this SAC. There is no potential hydrological connection from the proposed scheme to this SAC via watercourses, drains, ditches or any other vectors. The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the habitats for which the SAC has been designated and does not have the potential to affect the conservation objectives of these habitats. This SAC is not considered further.
Glen of the Downs SAC (000719) ⁶	1.8km W	▪ Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]	No. There is no direct overlap between the proposed scheme and this SAC. There is no potential hydrological connection from the proposed scheme to this SAC via watercourses, drains, ditches or any other vectors, as this SAC is upstream from the proposed scheme. The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the habitat for which the SAC has been designated and does not have the potential to affect the conservation objectives of this habitat.

⁵ NPWS (2017) Conservation Objectives: Bray Head SAC 000714. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

⁶ NPWS (2020) Conservation Objectives: Glen of the Downs SAC 000719. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.



				This SAC is not considered further.
The Murrough Wetlands (002249) ⁷	SAC	2.3km S	▪ 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 davallianae</i> [7210] ▪ Alkaline fens [7230]	No. There is no direct overlap between the proposed scheme and this SAC. There is no hydrological connectivity between the proposed sched and this SAC. The Three Trouts Stream represents the only potential downstream connection; however, this watercourse discharges directly into the Irish Sea, where dilution, dispersal and attenuation will occur. Consequently, there is no viable pathway by which potential pollutants or other effects arising from the proposed scheme could be transported to, or exert any influence on the QI habitats of this SAC. This SAC is not considered further.
Carriggower Bog SAC (000716) ⁸		6.3km SW	▪ Transition mires and quaking bogs [7140]	No. There is no direct overlap between the proposed scheme and this SAC. There is no potential hydrological connection from the proposed scheme to this SAC via watercourses, drains, ditches or any other vectors. The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the habitat for which the SAC has been designated and does not have the potential to affect the conservation objectives of this habitat. This SAC is not considered further.

⁷ NPWS (2021) Conservation Objectives: The Murrough Wetlands SAC 002249. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

⁸ NPWS (2019) Conservation Objectives: Carriggower Bog SAC 000716. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.



Ballyman SAC (000713) ⁹	Glen	7.4km NW	▪ Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] ▪ Alkaline fens [7230]	No. There is no direct overlap between the proposed scheme and this SAC. There is no potential hydrological connection from the proposed scheme to this SAC via watercourses, drains, ditches or any other vectors. The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the habitats for which the SAC has been designated and does not have the potential to affect the conservation objectives of these habitats. This SAC is not considered further.
Knocksink SAC (000725) ¹⁰	Wood	8.3km NW	▪ Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220] ▪ Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] ▪ 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]	No. There is no direct overlap between the proposed scheme and this SAC. There is no potential hydrological connection from the proposed scheme to this SAC via watercourses, drains, ditches or any other vectors. The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the habitats for which the SAC has been designated and does not have the potential to affect the conservation objectives of these habitats. This SAC is not considered further.
Wicklow Mountains (002122) ¹¹	SAC	8.9km W	▪ Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] ▪ Natural dystrophic lakes and ponds [3160] ▪ Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]	No. There is no direct overlap between the proposed scheme and this SAC.

⁹ NPWS (2019) Conservation Objectives: Ballyman Glen SAC 000713. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.

¹⁰ NPWS (2021) Conservation Objectives: Knocksink Wood SAC 000725. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

¹¹ NPWS (2017) Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.



-
- European dry heaths [4030]
 - Alpine and Boreal heaths [4060]
 - Calaminarian grasslands of the *Violetalia calaminariae* [6130]
 - Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]
 - Blanket bogs (* if active bog) [7130]
 - Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) [8110]
 - Calcareous rocky slopes with *chasmophytic* vegetation [8210]
 - Siliceous rocky slopes with *chasmophytic* vegetation [8220]
 - Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0]
 - *Lutra lutra* (Otter) [1355]
-

There is no potential hydrological connection from the proposed scheme to this SAC via watercourses, drains, ditches or any other vectors.

The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the habitats and species for which the SAC has been designated and does not have the potential to affect the conservation objectives of these habitats and species.

This SAC is not considered further.



Table 5-2 - Special Protection Areas for birds assessed for potential connectivity to the Proposed scheme.

Site Name and Code	Approximate Distance from project scheme location	Qualifying Interests	Connectivity
The Murrough SPA (004186) ¹²	800m SE	- Red-throated Diver (<i>Gavia stellata</i>) [A001] - Greylag Goose (<i>Anser anser</i>) [A043] - Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] - Teal (<i>Anas crecca</i>) [A052] - Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] - Herring Gull (<i>Larus argentatus</i>) [A184] - Wigeon (<i>Mareca penelope</i>) [A855] - Little Tern (<i>Sternula albifrons</i>) [A885] - Wetland and Waterbirds [A999]	Yes. There is no direct overlap between the proposed scheme and this SPA. There is potential hydrological connectivity to the SPA via the Three Trouts Stream, which may provide a pathway for pollutants or sediments to reach QI wetland habitats of the SPA. In addition, several QI bird species of this SPA are field-feeding species and may utilise the grassland habitat through which the proposed scheme will be constructed. Therefore, there is potential for temporary disturbance to any individuals foraging in the vicinity of the proposed works. Given these potential pathways, the scheme will be further assessed to determine whether it has the potential to result in likely significant effects on the qualifying interests of this SPA. This SPA is considered further.
Wicklow Mountains SPA (004040) ¹³	8.8km W	- Merlin (<i>Falco columbarius</i>) [A098] - Peregrine (<i>Falco peregrinus</i>) [A103]	No. There is no direct overlap between the proposed scheme and this SPA.

¹² NPWS (2024) Conservation Objectives: The Murrough SPA 004186. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

¹³ NPWS (2024) Conservation Objectives: Wicklow Mountains SPA 004040. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.



There is no potential hydrological connection from the proposed scheme to this SPA via watercourses, drains, ditches, or any other vectors.

The QI species of the SPA rely on extensive upland habitats for breeding and hunting. There are no suitable foraging or hunting grounds for these raptors within the vicinity of the proposed scheme.

The location, scale and duration of proposed scheme is such that it will not contribute to direct or indirect impacts on the species for which the SPA has been designated and does not have the potential to affect the conservation objectives of these species.

This SPA is not considered further.



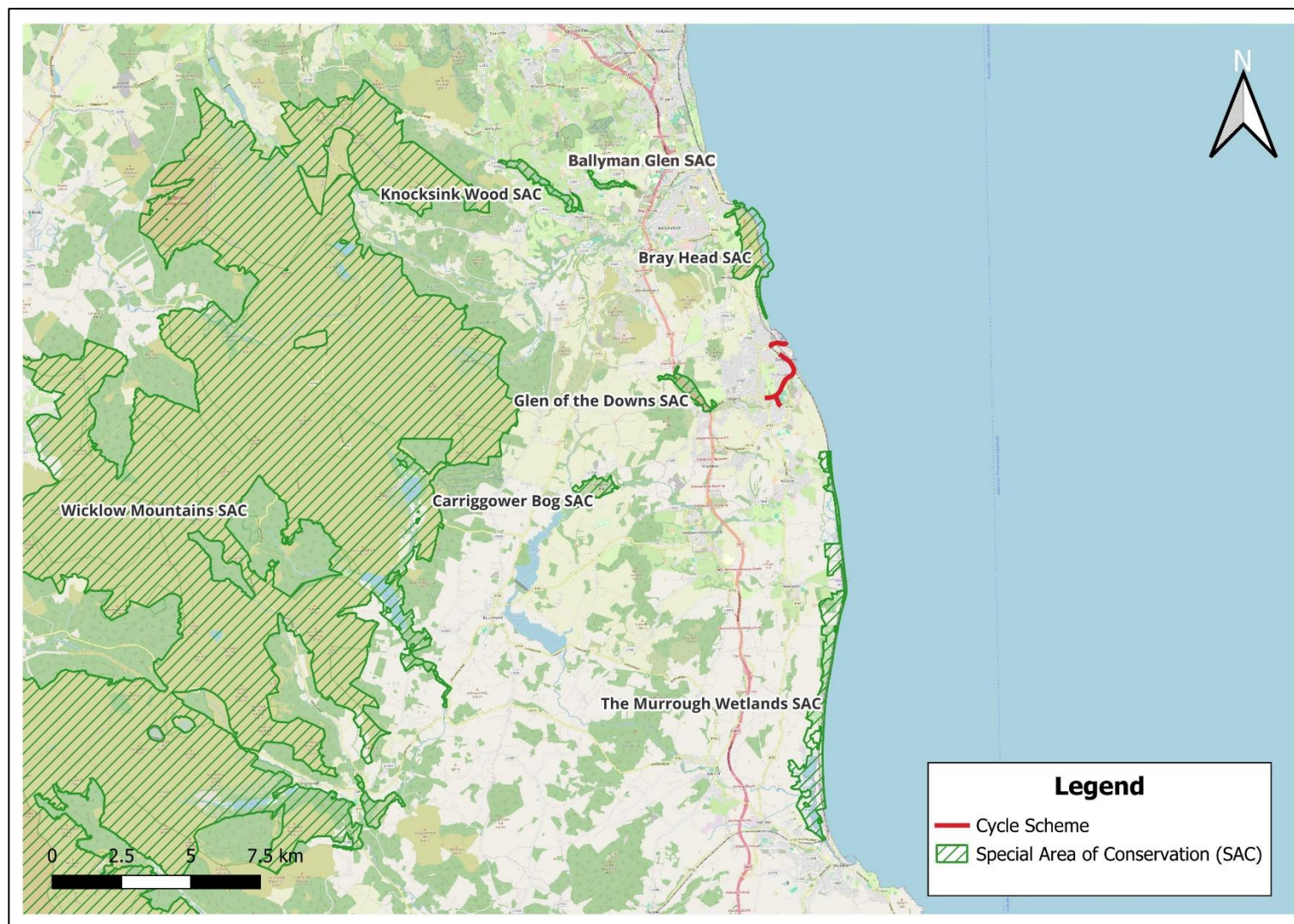


Figure 5-1 – Special Areas of Conservation assessed for potential connectivity to the Proposed scheme.

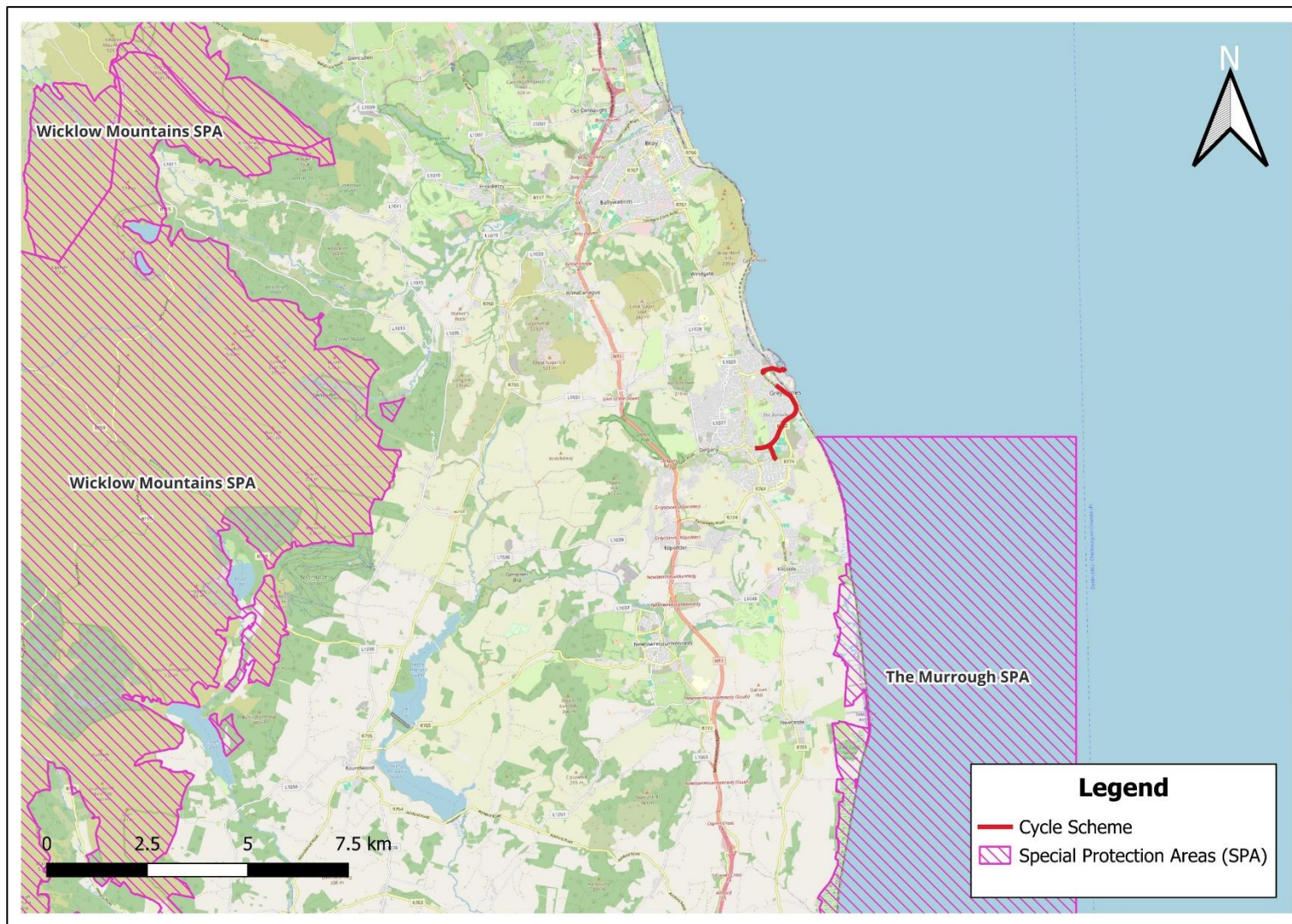


Figure 5-2 – Special Protection Areas assessed for potential connectivity to the Proposed scheme.

5.2 Brief Description of The Murrough SPA

A synopsis of the SPA, as detailed in the Natura 2000 Standard Data Form, is as follows¹⁴:

“The Murrough SPA comprises a coastal wetland complex that stretches for 13 km from Kilcoole Station, east of Kilcoole village in the north, to Wicklow town in the south, and extends inland for up to 1 km. The site includes area of marine water to a distance of 200 m from low water mark. There is a railway on top of the beach and much agricultural reclamation of the marshes/saltmarshes.

*The site is of high importance for the good numbers and wide variety of waterfowl species that it holds in winter and on passage. The improved grassland provides feeding for Greylag Geese (*Anser anser*). This is one of a handful of sites around the south and east coasts at which Reed Warbler (*Acrocephalus scirpaceus*) has in recent years proved to be a regular breeding species. For some years in the 1980s, Bearded Tit (*Panurus biarmicus*) bred here at its only site in Ireland, emphasizing the potential of this site to hold the community of reedswamp species present in Great Britain, but largely absent in Ireland. The shingle beach is a breeding site for the country's largest colony of Little Tern (*Sternula albifrons*), and supports 19% of the all-Ireland population.”*

5.2.1 Conservation Objectives of The Murrough SPA

The conservation objectives for The Murrough SPA, to maintain favourable conservation for each of the qualifying interests of the site, were published by NPWS (2024), Version 1; 08/10/2024.

These were reviewed and considered when preparing this report. The conservation objectives can be broadly summarized as follows: -

- To maintain the Favourable conservation condition of Red-throated Diver in The Murrough SPA,
- To restore the Favourable conservation condition of Greylag Goose in The Murrough SPA,
- To restore the Favourable conservation condition of Light-bellied Brent Goose in The Murrough SPA,
- To maintain the Favourable conservation condition of Wigeon in The Murrough SPA,
- To maintain the Favourable conservation condition of Teal in The Murrough SPA,
- To maintain the Favourable conservation condition of Black-headed Gull in The Murrough SPA,
- To maintain the Favourable conservation condition of Herring Gull in The Murrough SPA,
- To maintain the Favourable conservation condition of Little Tern in The Murrough SPA, and,
- To maintain the Favourable conservation condition of Wetland habitats in The Murrough SPA as a resource for the regularly-occurring migratory waterbirds that utilise these areas.

5.2.2 Potential Threats

The threats, pressures and activities with impacts on The Murrough SPA¹⁵ are listed below in Table 5-3.

Table 5-3 - Threats, Pressures and activities with impacts on The Murrough SPA.

Rank	Threats and Pressures
High	Fertilisation
High	Railway Lines, TGV

¹⁴ <https://natura2000.eea.europa.eu/Natura2000/sdf/#/sdf?site=IE0004186&release=62>

¹⁵ <https://biodiversity.europa.eu/sites/natura2000/IE0004186>

Medium

Walking, horseriding and non-
motorised vehicles



5.3 Identification of Potential Impacts on European Sites

As outlined above, there is 1no. European site within c. 800m of the proposed project scheme. This site has the potential to be impacted by the proposed scheme. The possible sources, receptors and pathways for impacts are discussed below.

5.3.1 Construction Phase

Direct Impacts

The proposed scheme is not located within or adjacent to any European sites and as such there will be no direct impacts on any European site as a result of the construction of the proposed scheme.

Indirect Impacts

During the construction phase, indirect effects on the Murrough SPA could arise from works associated with the proposed bridge over the Three Trouts Stream, which discharges into the Irish Sea immediately adjacent to the SPA. Potential pathways could include short-term increases in suspended sediment, accidental hydrocarbon release, or minor nutrient or contaminant inputs that could be transported downstream. However, once entering the marine environment, any such inputs would be subject to rapid dilution, dispersal, and natural attenuation within the Irish Sea, preventing any measurable change to water quality conditions within the SPA. As a result, no impacts on the qualifying wetland habitats of the SPA are anticipated.

Some of the SPA's QI bird species are known to feed in terrestrial grassland habitats; however, the grassland affected by the proposed scheme is located within an existing urbanised housing estate and is already subject to regular human activity, disturbance, and maintenance. Any temporary construction-related disturbance (e.g., noise or movement) would be similar to baseline urban levels and would not reduce the availability or quality of field-feeding habitat for these species, nor would it influence their behaviour within the SPA or its functionally linked lands.

Similarly, while other indirect disturbance pathways to QI bird species, such as temporary vibration or noise, can be identified, these effects would be highly localised, occur away from the coastal zone and would not influence the foraging or roosting areas used by the SPA's SCI bird species. Overall, the combination of distance, hydrological separation and marine dilution processes means that there is no likelihood of significant indirect effects on the qualifying habitats or bird species of the Murrough SPA arising from the proposed works during the construction phase.

5.3.2 Operational Phase

Direct Impacts

The proposed scheme is not located within or adjacent to any European sites and as such there will be no direct impacts on any European sites as a result of the operational phase of the proposed scheme.

Indirect Impacts

During the operational phase, the proposed cycle scheme is not expected to give rise to any indirect impacts on the Murrough SPA. Once constructed, the bridge over the Three Trouts Stream will function as a passive structure with no effluent discharge, alteration of hydrology, or ongoing sources of sediment or pollution that could be transported downstream. There will be no increase in drainage runoff compared to baseline conditions, and rainfall / surface water



run-off from the hardstanding areas poses no risk to water quality in the SPA as no polluting substances are generated from walking or cycling activity.

Some of the SPA's QI bird species may utilise terrestrial grassland habitats, however, the grassland within the project footprint is located in an existing urbanized housing estate already subject to regular human presence and disturbance, and the operational use of a cycleway will not alter the suitability of this area or reduce habitat availability for field-feeding birds.

Potential indirect effects such as increased human activity or noise will remain highly localised and confined to an inland environment outside the SPA, with no potential to influence coastal foraging, commuting, or roosting behaviour. Overall, the completed scheme will not introduce any impact mechanism that could result in changes to the conservation objectives of the Murrough SPA. There is no likelihood of significant indirect effects occurring during the operational phase.



5.4 In-combination Effects

5.4.1 Requirement for Assessment

The requirement for AA arising out of Article 6(3) of the Habitats Directive covers plans and projects that, “*either individually or in combination with other plans or projects*”, are likely to have a significant effect on one or more Natura 2000 sites. This means that AA is required for any plan or project that, in combination with other plans or projects, would have a significant effect on one or more Natura 2000 sites, irrespective of the presence or absence of such effects from that plan or project on its own. Therefore, regardless of the significance of the effects of the plan or project individually, the potential for significant effects in combination with other plans and projects must be considered in all cases.

5.4.2 Approach and Methodology

The objective of this requirement is to capture significant effects potentially arising from the cumulation or other interaction of non-significant effects from multiple plans and projects. Consequently, the assessment of potential in-combination effects is not a pair-wise assessment, rather, it considers the totality of the effects arising from all plans and projects affecting the Natura 2000 site(s) in question. In identifying the plans and projects to be included in this assessment, it is important to define an appropriate geographical scope and timescale over which potential in-combination effects are to be considered and the sources of information to be consulted, as described below. It is also important to consider the nature of the interactions between effects, which may be additive, antagonistic, synergistic or complex.

5.4.3 Geographical Scope

In defining the geographical scope for identifying potential in-combination effects, it is important to remember that effects are evaluated in view of the conservation objectives of the Natura 2000 site(s) concerned. As such, two or more effects relating to the same conservation objective for a given Natura 2000 site would combine even if their geographical extents did not overlap. For example, the loss of a small area of an Annex I habitat type listed as a qualifying interest of a Natura 2000 site would combine with the loss of an entirely unconnected area of the same habitat type from a remote part of the same site to produce an in-combination effect, the significance of which would need to be evaluated in view of the relevant conservation objective. On that basis, the scope of the assessment of in-combination effects extends to all plans and projects affecting the same conservation objectives as the plan or project under consideration, irrespective of whether those effects are significant or not.

In this case, however, given the scale of the proposed scheme and the sensitivities of the Natura 2000 sites that may act as receptors, it was considered most appropriate to define the in-combination assessment area based on the presence of plausible source–pathway–receptor links. Accordingly, the geographical scope includes those surrounding areas where pressures arising from the project, together with other plans or projects, could feasibly be transmitted to Natura 2000 sites via hydrological, hydrogeological, ecological, or functional pathways, as outlined in Section 5.1.

5.4.4 Timescale

The timescale over which potential in-combination effects were considered in this case covered plans and projects from 5 years ago (i.e. 2021) to the present and all reasonably foreseeable future plans and projects, i.e. published draft plans and projects which are already in the planning system or have received planning permission.



5.4.5 Sources of Information

The following sources of information were consulted to gather information on other plans and projects:

- Wicklow County Council Planning Data viewed through; <https://wicklow.maps.arcgis.com/apps/webappviewer/index.html?id=57b22c27e7c049fbac54117da1a20f60>
- An Coimisiún Pleanála Planning Applications viewed through; <https://www.pleanala.ie/en-ie/home>
- Wicklow Development Plan 2022–2028¹⁶
- Transport Infrastructure Ireland¹⁷
- Irish Water¹⁸

The threats, pressures and activities with negative impacts on the Murrough SPA were used to identify plans and projects which, by their nature, are likely to give rise to potential impacts on the sites concerned.

5.4.6 Assessment

Wicklow County Development Plan (CDP) sets out policies and objectives for the development of the county. The CDP aims to promote the sustainable development and improvement of the economic, environmental, cultural and social aspects of County Wicklow. The CDP also requires that any developments must be subject to AA process and that permitted developments comply with the requirements of the WFD, the relevant River Basin Management Plans and the Habitats Directive. A Strategic Environmental Assessment (SEA) was prepared for the CDP and it went through the AA process. The findings of which were integrated into the objectives of the CDP resulting in a plan that affords high levels of protection to the environment and Natura 2000 sites.

A review of Transport Infrastructure Ireland (TII) publicly available planned projects¹⁹ did not identify any major road projects within 10km of the proposed scheme.

A review of Uisce Éireann (Irish Water) projects²⁰ did not identify any water projects in the vicinity of the proposed scheme.

A search of Wicklow County Council planning and An Coimisiún Pleanála planning applications has been undertaken for applications submitted within the last 5 years in the vicinity the proposed scheme (last accessed 05/03/2026). A number of small-scale residential projects in the vicinity of the Proposed scheme site have been granted planning permission, including the retention of existing developments and the construction or extension of domestic dwellings. These developments are limited in scale and, based on their location, do not have any pathways that could give rise to direct, indirect, or cumulative impacts on Natura 2000 sites. While foul and surface water from these residential projects will discharge to the existing municipal foul and stormwater networks, they do not interact with any watercourses within the Proposed scheme site and therefore do not create a hydrological pathway for effects. In addition, there are no other ecological pathways, such as habitat loss, disturbance, airborne emissions, or ecological connectivity, through which these projects could combine with the proposed development to affect any Natura 2000 site. Given the absence of any source–pathway–receptor linkages for water quality or for any other impact pathways, it is concluded that the small scale residential projects in the area will not give rise to significant effects in combination with the Proposed scheme.

¹⁶ <https://www.wicklow.ie/Living/CDP2021>

¹⁷ <https://www.tii.ie/projects/>

¹⁸ <https://www.water.ie/projects/>

¹⁹ <https://www.tii.ie/public-transport/projects-and-improvements/>

²⁰ <https://www.water.ie/projects/?map=our-projects&id=627>

Key developments which shall be considered are large-scale developments in the region of the proposed scheme, there are 2no. of these developments which have been further assessed in terms of in-combination effects with the proposed scheme and are presented in Table 5-4 below.

It is considered that there are no An Coimisiún Pleanála or Council approved developments or projects that will act in combination with the proposed scheme to give rise to significant in-combination effects on the Murrough SPA.

Table 5-4 - Planning applications near the proposed cycle scheme.

Ref. No.	Project / Applicant	Project Summary	In-combination Assessment
WCC Ref: 24360	Health Service Executive (HSE)	A new Primary Care Centre. The development will consist of a four-storey building (with five-storey stair tower), parking for 70 cars, bicycle parking, a new access road off Mill Road, hard and soft landscaping, and associated site works, with a total development area of 5,620 sqm	This project has been subject to the Appropriate Assessment Screening process which concluded: <i>“It can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on any European site, in the absence of any mitigation”</i> – Moore Group – Environmental Services The environmental assessment for this Primary Care Centre project does not consider that there will be likely significant effects, either alone or in-combination with other projects, to any Natura 2000 sites. The Primary Care Centre project has no direct or indirect connectivity to the Proposed scheme. The Primary Care Centre project is remote from and has no potential to interact with the Three Trouts Stream. As the Three Trouts Stream is the only potential pathway linking the Proposed scheme to any Natura 2000 site, and the Primary Care Centre project has no connection to this pathway, there is no potential for in-combination effects on the Murrough SPA or any other Natura 2000 site.
WCC 221239	Ref: Wicklow County Council	Construction of a boardwalk at the South Beach in Greystones, Co. Wicklow in order to improve access for all users onto the beach	This project has been subject to the Appropriate Assessment Screening process which concluded: <i>“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”</i> – Alan Lauder Consulting The environmental assessment for this boardwalk project does not consider that there will be likely significant effects, either alone or in-combination with other projects, to any Natura 2000 sites. The boardwalk project has no direct or indirect connectivity to the Proposed scheme. The boardwalk project is remote from and has no potential to interact with the Three Trouts Stream. As the Three Trouts



Ref. No.	Project / Applicant	Project Summary	In-combination Assessment
			Stream is the only potential pathway linking the Proposed scheme to any Natura 2000 site, and the boardwalk project has no connection to this pathway, there is no potential for in-combination effects on the Murrough SPA or any other Natura 2000 site.



5.5 Likelihood of Significant Effects on Natura 2000 Sites

The proposed scheme is located within the urban areas of Greystones and as such there is no direct connectivity to any European sites, as such, any potential direct impacts are negated.

There is indirect hydrological connectivity from the proposed development to the Murrough SPA via the Three Trouts Stream, however, neither the construction nor operational phases will introduce impact pathways capable of affecting the site. Any minor construction-related inputs would be rapidly diluted and dispersed on entering the Irish Sea, preventing changes to the SPA's qualifying habitats, and potential disturbance to SCI/QI birds, including those that occasionally feed in terrestrial grasslands, would remain highly localised within an already urbanised inland setting. Once operational, the bridge and cycle scheme will not generate pollutants, alter hydrology, or create effects that could reach the SPA.

It has been concluded that, given the scale, nature, and extent of the proposed scheme and considering any potential contaminants the proposed scheme could potentially generate, there is no potential for likely significant effects to the Murrough SPA via this hydrological connectivity.

5.6 Consideration of Findings

On the basis of objective information and in view of best scientific knowledge and applying a precautionary principle, it is concluded by the authors of this report that with the absence of any mitigation measures the proposed cycle scheme, either alone or in-combination with other plans or projects, will not result in likely significant effects on the Murrough SPA or any other European site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment.

Should the scope, nature or extent of the proposed scheme change, a new assessment (AA Screening Report or AA Screening Addendum Report) would be required.

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