



An
Bord
Pleanála

Inspector's Report

313944-22

Development	18 no. 2-storey, detached dwellings and associated development.
Location	Holmpatrick, Rush Road (R128), Skerries, Co. Dublin.
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F22A/0187
Applicant(s)	Jolview Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party v. Decision
Appellant(s)	Jolview Limited
Observer(s)	(1) Mary Horan (2) Gerald Horan (3) Olive Sarsfield (4) Diarmuid McHugh & Others (5) Alison Ryan (6) Paul O'Sullivan

Date of Site Inspection

16th October 2023

Inspector

Louise Treacy

1.0 Site Location and Description

- 1.1. The subject site has a stated area of 3.87 ha and is located on the southern outskirts of Skerries, approx. 2 km (as the crow flies) from the town centre. The site comprises agricultural land which is accessed via an existing agricultural entrance and laneway located on the seaward / eastern side of regional road R128, which runs in a north-south direction between Skerries and Rush respectively. A double white line is in place to the front of the site entrance, where a speed limit of 60 km/hr applies. Sightlines are restricted in a northerly direction at the site entrance. There is an existing footpath on the western side of the public road, but none is provided along the eastern side adjacent to the appeal site.
- 1.2. The agricultural laneway extends approx. 85 m from the public road into the main body of the site, which is irregularly shaped, with site levels decreasing noticeably from south to north-east towards the coast. The site was planted at the time of the inspection, with some surface water ponding noted on the lower area adjacent to the eastern boundary. The northern/north-eastern site boundaries are open in character, which together with the decreasing site slope, provides panoramic views towards the sea. The southern/south-eastern site boundaries are more defined and are characterised by mature hedgerows and trees.
- 1.3. The site is largely located to the rear of existing dwellings known as the “Holmpatrick Rural Cluster”, which front onto the R128 in a pattern of ribbon development. These dwellings include single-storey, semi-detached cottages (Hacketstown Cottages) located on the southern side of the site access/agricultural laneway and 3 no. detached dormer dwellings located to the north. The rear gardens of 2 no. of these detached dwellings adjoin the northern and northwestern boundaries of the appeal site. Views are available into the rear gardens of all 3 of these properties from the northern end of the appeal site.
- 1.4. Agricultural lands adjoin the site to the north-east, east and south, with the coast and Irish Sea located beyond the agricultural lands to the east. Ballyhavil Lane extends along the south-eastern site boundary and provides access to a detached dwelling and associated farm buildings which adjoin the subject site.

2.0 Proposed Development

- 2.1. The proposed development will consist of 18 no. detached dwellings (4-bedroom), 2-storeys in height all provided with private gardens and associated in-curtilage parking. The proposed development will also provide for associated landscaping including play equipment, pocket parks and a Class 1 area of public open space; footpaths; boundary treatments; public lighting and all associated site infrastructure and engineering works necessary to facilitate the development with a new vehicular access onto the Rush Road (R128).
- 2.2. The proposed dwellings are arranged in clusters of 3 no. units across the central and southern portions of the site and are accessed via a meandering internal access road. The dwellings are split level and have distinctive monopitch roof profiles. All units have 4 no. bedrooms (8 no. types) and range in size from 186 m² to 198 m². Each dwelling has off-street parking for 2 cars, a private rear garden and substantial front/side gardens.
- 2.3. The communal open space within the site is subdivided into 4 no. separate parcels ranging in size from 547 m² to 1,107 m². The northern and north-western portions of the site are designated to accommodate open space and a sculpture park (1.72 ha).

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. Fingal County Council issued **Notification of the Decision to Refuse Permission** for the proposed development on 2nd June 2022 for 2 no. reasons as follows:

(1) The proposed development is located on greenfield lands identified in the Holmpatrick Masterplan, which includes elements for public leisure provision, hotel, residential, a coastal walkway and associated infrastructure. The proposed development therefore contravenes the Masterplan objectives as it proposes a stand-alone residential development. Furthermore, the proposal is remote from Skerries town centre, with insufficient pedestrian and cycle accessibility and public transport connectivity at this location. The proposed development therefore is largely car dependant and would promote unsustainable transport modes and would be

contrary to the NPF, Section 28 Guidelines, and the County Development Plan which seeks to promote the development of sites in locations that are better serviced by existing facilities and public transport. As such, the proposed development would be contrary to the proper planning and sustainable development of the area.

(2) The site is located in a coastal area designated as a Highly Sensitive Landscape with an exceptional landscape value and in a partially designated High Amenity Area. The proposed development by reason of its scale, height and massing would have an overbearing impact on the surrounding area and would seriously be contrary to the objectives of the Fingal County Development Plan NH35, NH36, NH37 and NH38 which seek to protect and enhance these areas and prevent inappropriate development within such highly sensitive areas. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports (1st June 2022)

3.2.2. Basis of Planning Authority's decision.

3.2.3. Other Technical Reports

3.2.4. **Environment and Water Services (9th May 2022):** No objection to the proposed development subject to condition.

3.2.5. **Parks and Green Infrastructure Division (11th May 2022):** Concerns raised in relation to layout of open spaces, the impact of works on site vegetation and ecology and the proposed landscape plan.

3.2.6. **Water Services Department (11th May 2022):** No objection to the proposed development.

3.2.7. **Transport (1st June 2022):** In the event a grant of permission is considered, a request for Further Information is recommended in relation to: (1) the carrying out of an ATC speed survey over a week to determine if visibility of 63 m is sufficient for ambient traffic speeds on the road, (2) the road alignment between the near side road edge to the north and south of the development, (3) pedestrian priority on the

internal road layout, (4) auto-track analysis for bin trucks and emergency services vehicles, (5) a taking-in-charge drawing.

- 3.2.8. **Public Lighting:** The lighting designer is requested to provide the data file using the Reality Lighting software to assess if the public lighting is to standard.

3.3. **Prescribed Bodies**

- 3.3.1. **Dept. of Housing, Local Government and Heritage (12th May 2022):**

Recommends that an Archaeological Impact Assessment be requested by way of Further Information.

- 3.3.2. **Irish Water (20th May 2022):** No objection to the proposed development subject to conditions.

3.4. **Third Party Observations**

- 3.4.1. 11 no. third party observations are on file as follows: (1) Úna Waldron, Cluain Mara, Rush Road, Skerries, Co. Dublin, (2) Paul O'Sullivan, 16 Hacketstown Cottages, Rush Road, Skerries, Co. Dublin, (3) Diarmuid McHugh, Holmpatrick, Rush Road, Skerries, Co. Dublin, (4) Derek Drumm, "Beal na mBlath", Rush Road, Skerries, Co. Dublin, (5) Olive Sarsfield, Ballyhavil Farm, Rush Road, Skerries, (6) Mary Horan, "Iniscealtra", Ballyhavil Lane, Skerries, (7) Gerald Horan, Ballyhavil Lane, Hacketstown, Skerries, (8) Killian & Orlagh Keane, 3 Solider Cottages, Rush Road, Skerries, (9) Alison Ryan, 1 Holmpatrick Terrace, Skerries, (10) J Mark Ryan & Brid Ryan, 2 Soliders Cottages, Rush Road, Skerries, (11) Vivian Ryan, Sandy Hills, Rush, Co. Dublin.
- 3.4.2. The issues which are raised can be summarised as follows: (1) negative impact on highly sensitive, coastal landscape, (2) dangerous junction at site entrance, (3) right-of-way over entrance laneway and adjoining masterplan lands, (4) park will attract visitors and increase traffic on laneway, (5) rural location of site – non-sequential development leading to urban sprawl, (6) regional road has poor horizontal and vertical alignment, (7) previous history of refusals of planning permission on the site, (8) residential development not appropriate without supporting community facilities, (9) no cycle lanes and substandard footpaths, (10) overlooking of adjoining properties and gardens, (11) overdevelopment, (12) negative visual impacts on surrounding landscape character and the coast, (13) substandard sightlines at proposed entrance, (14) flooding, (15) insufficient details in relation to Part V, (16)

impacts on/from adjoining farming land, (17) impact on Annex 1 habitat, seabirds and Shenick Island SPA, (18) inappropriate development under land use zoning, (19) no local facilities, (20) light pollution, (21) traffic calming measures and improved footpath connections required, (22) impact on site hedgerows and ditches, (23) noise impacts.

4.0 Planning History

- 4.1. **ABP Ref. 318739-23:** Inclusion of the land on the Residential Zoned Land Tax draft map.
- 4.2. **ABP Ref. PL06F.247928:** Planning permission refused on 7th September 2017 for 24 no. 2-storey dwellings, a 2-storey hotel incorporating a leisure centre with gymnasium and swimming pool, hard and soft landscaping and all associated development, with access via a new signalised junction arrangement from the R128.
- 4.3. Permission was refused for 2 no. reasons which can be summarised as follows: (1) the location of the proposed hotel on open space zoned lands is a material contravention of the development plan, and (2) the proposed development would seriously injure the visual amenities and landscape character of the area, would materially contravene development plan objectives in relation to Highly Sensitive Landscapes and would be contrary to the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities.
- 4.4. **ABP Ref. PL06F.234679:** Planning permission refused on 10th February 2010 for development comprising 4 no. single-storey dwellings with associated access road and new vehicular access from the Skerries-Rush Road. Permission was refused for 2 no. reasons which can be summarised as follows: (1) endangerment of public safety by reason of a traffic hazard on foot of the substandard access point, (2) the proposed development would result in conflicting traffic and pedestrian movements along the proposed access road, which is not considered of sufficient standard.
- 4.5. **ABP Ref. PL06F.213774:** Planning permission refused on 6th March 2006 for 4 no. single-storey dwellings and 6.1 ha of public open space. Permission was refused for 1 no. reason on the basis that it had not been demonstrated that the proposed development would not endanger public safety by reason of traffic hazard.

- 4.6. **ABP Ref. PL06F.202809:** Planning permission refused on 14th October 2003 for 4 no. detached dwellings and 6.1 ha of public open space. Permission was refused for 3 no. reasons which can be summarised as follows: (1) the proposed development would endanger public safety by reason of a traffic hazard on foot of the substandard access point, (2) the siting and design of the dwellings would seriously injure the visual amenities of the area and conflict with the overall zoning objective for the area, (3) the proposed development would result in conflicting traffic and pedestrian movement along the substandard access roadway.

5.0 Policy and Context

- 5.1. While the Fingal Development Plan 2017-2023 was in force at the time this planning application was lodged, the 2023-2029 development plan has been adopted in the interim and is the relevant local planning policy document for the purposes of adjudicating this appeal case.

5.2. Fingal Development Plan 2023-2029

5.3. Land Use Zoning

- 5.3.1. The site is subject to 2 no. land use zonings including: (1) “**RS – Residential**” which has the objective to “provide for residential development and protect and improve residential amenity” and, (2) “**HA – High Amenity**” which has the objective to “protect and enhance high amenity areas”.
- 5.3.2. Residential land uses are “permitted in principle” on RS zoned land. It is proposed to provide open space and a sculpture park on the HA zoned portion of the site, with open space being a permitted use.

5.4. Core and Settlement Strategies

- 5.4.1. Skerries is designated as a “Self-Sustaining Town” in the county settlement strategy. Relevant policies concerning the core and settlement strategies are identified below.
- 5.4.2. **Policy CSP2 (Compact Growth and Regeneration):** Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

- 5.4.3. **Policy CSP4 (Sequential Development):** Promote the sequential development of serviceable lands in accordance with the tiered approach to land zoning outlined in the NPF, the RSES and MASP and ensure co-ordination with other neighbouring planning authorities where strategic development corridors traverse county boundaries.
- 5.4.4. **Policy CSP34 (Consolidate Growth of Self-Sustaining Towns):** Consolidate the growth of Self-Sustaining towns including Malahide, Balbriggan, Lusk, Portmarnock, Rush and Skerries as set out in the Settlement Strategy for RSES and by encouraging infill development and compact growth rather than greenfield development and by intensification at appropriately identified locations.
- 5.4.5. **Policy CSP36 (Focus Growth Within and Contiguous to Core in Self-Sustaining Towns):** Support the sustainable long-term growth of Self-Sustaining Towns by focusing growth within and contiguous to the core to create a critical mass of population and employment based on local demand and the ability of local services to cater for sustainable growth levels.

5.5. **Green Infrastructure and Natural Heritage**

- 5.5.1. The development plan Landscape Character Assessment classifies Fingal's landscapes according to (1) types and values, and (2) sensitivities. The appeal site is located within the Coastal Character Type and is designated as a Highly Sensitive Landscape with Exceptional Landscape Value.
- 5.5.2. **Policy GINHP25 (Preservation of Landscape Types):** Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.
- 5.5.3. **Policy GINHP28 (Protection of High Amenity Areas):** Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.
- 5.5.4. **Objective (GINHO58 – Sensitive Areas):** Resist development such as houses, forestry, masts, extractive operations, landfills, caravan parks, and campsites, and large agricultural/horticulture units which would interfere with the character of highly sensitive areas or with a view or prospect of special amenity value, which it is necessary to preserve.

- 5.5.5. **Objective GINHO59 (Development and Sensitive Areas):** Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area. New development in highly sensitive areas shall not be permitted if it:
- Causes unacceptable visual harm.
 - Introduces incongruous landscape elements.
 - Causes the disturbance or loss of: (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.
- 5.5.6. **Policy GINHP26 (Preservation of Views and Prospects):** Preserve views and prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.
- 5.5.7. There is an objective to preserve views along the regional road to the west of the site (sheet no. 1- Green Infrastructure 1).
- 5.5.8. **Policy GINHP28 (Protection of High Amenity Areas):** Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.
- 5.5.9. **Policy GINHP29 (Development and the Coast):** Protect the special character of the coast by preventing inappropriate development along the coast.
- 5.5.10. **Objective GINHO73 (New Development and the Coast):** Prevent inappropriate development along the coast, particularly on the seaward side of coastal roads. New development for which a coastal location is required shall, wherever possible, be accommodated within existing developed areas.

5.6. **Archaeology**

- 5.6.1. An enclosure (DU05028) is located towards the south-eastern boundary of the site.
- 5.6.2. **Policy HCAP3 (Record of Monuments and Places/ Sites and Monuments Record):** Safeguard archaeological sites, monuments, objects and their settings listed in the Record of Monuments and Places (RMP), Sites and Monuments Record

(SMR), underwater cultural heritage including protected wrecks and any additional newly discovered archaeological remains.

- 5.6.3. **Policy HCAP4 (Preservation-in-situ):** Favour the preservation in-situ (or at a minimum preservation by record) of all sites and features of historical and archaeological interest.

5.7. **Development Management Standards**

- 5.7.1. The design criteria for residential development are set out in Sections 14.6, 14.8 and 14.9 of the development plan. Section 14.6.2 of the plan states that all residential schemes are required to provide for a mix which reflects existing, and emerging household formation, housing demand patterns and trends identified within the specific area of the site and/or within the County as a whole. Applications shall include: (i) a dwelling mix providing a balanced range of dwelling types and sizes to support a variety of households; (ii) a detailed breakdown of the proposed unit type and size; (iii) a statement outlining how the scheme has been designed to meet the needs of older people/or persons with a disability and/or lifetime homes; and (iv) on smaller infill sites, a mix of dwellings which contribute to the overall dwelling mix in the locality.

5.8. **Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, (2024)**

- 5.8.1. These Guidelines set out national planning policy and guidance in relation to the creation of settlements that are compact, attractive, liveable and well designed. There is a focus on the renewal of settlements and on the interaction between residential density, housing standards and placemaking to support the sustainable and compact growth of settlements. Guidance in relation to Key Towns and Large Towns (5,000+ population), which includes Skerries, is set out in Section 3.3.3. The strategy is to support consolidation within and close to the existing built-up footprint.
- 5.8.2. The key priorities for such towns, in order of priority, are as follows:
- Plan for an integrated and connected settlement overall.
 - Strengthen town centres.
 - Protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality.

- Realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development.
- Deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the settlement.

5.9. National Planning Framework: Project Ireland 2040

5.9.1. The following National Planning Objectives (NPO) are relevant to this appeal case:

- 5.9.2. **NPO 3a:** Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- 5.9.3. **NPO 3b:** Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- 5.9.4. **NPO 11:** In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- 5.9.5. **NPO 33:** Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

5.10. Natural Heritage Designations

- 5.10.1. North-West Irish Sea SPA (site code: 004236), Skerries Islands SPA (site code: 004122), Rockabill SPA (site code: 004014), Rockabill to Dalkey Island SAC (site code: 003000), Lambay Island SPA (site code: 004069) and Lambay Island SAC (site code: 000204) are all located to the north-west of the appeal site at minimum separation distances of between approx. 140 m and 7 km.

5.11. EIA Screening

5.11.1. Class (10)(b)(i) and (iv) of Schedule 5, Part 2 of the Planning and Development Regulations, 2001 (as amended) provides that mandatory EIA is required for the following classes of development:

- Construction of more than 500 dwelling units,
- Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere. (In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use).

5.11.2. It is proposed to construct 18 no. dwelling houses which is significantly below the 500-unit threshold noted above. The site has an area of 3.87 ha and is therefore well below the applicable threshold of 20 ha. The introduction of this residential scheme would have no adverse impact in environmental terms on surrounding land uses and the proposed development is not likely to have a significant effect on any European site. The proposed development would not give rise to waste, pollution or nuisances that differ from that arising from other housing in the neighbourhood. It would not give rise to a risk of major accidents or risks to human health. The proposed development would use the public water and drainage services of Uisce Éireann and Fingal County Council, upon which its effects would be marginal.

5.11.3. I have concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment, and that on preliminary examination, an environmental impact assessment report for the proposed development was not necessary in this case.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. A first-party appeal against the Planning Authority's decision has been lodged by the applicant, the grounds of which can be summarised as follows:

- The proposed development accords with the relevant policies of the Fingal Development Plan 2017-2023.
- In the event the Board considers the proposed development would constitute a material contravention of the development plan by virtue of the conflict with the Holmpatrick Masterplan, permission could be granted under Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).
- The proposed development of 18 no. houses is of strategic importance in addressing the national housing crisis. Thus, the Board would be entitled to grant permission under S. 37(2)(b)(i) of the Planning and Development Act, 2000 (as amended).
- Objective Skerries 14 and Holmpatrick Masterplan Area MP 5.E give rise to significant concerns about the conformity of these policies with the development plan. The provision of a hotel on OS zoned land conflicts with the development plan; the masterplan is non-statutory and should be given limited weight in decision making; and the requirement for a masterplan conflicts with development plan objectives for housing delivery.
- The proposed dwellings and access road are located within the residentially zoned portion of the site only. The large Class 1 public open space is located on HA and OS zoned land and is permitted in principle under the zoning. The housing units will benefit from this open space but also have 11% open space within the RA zoned lands.
- The objectives for the Holmpatrick Masterplan materially contravene the primary land use zoning for the lands, which was indicated by the Board in their assessment of a previous application on the lands (ABP Ref. PL06F.247928). There are conflicting objectives in the development plan.

- The Development Management Guidelines for Planning Authorities (2007) state that development which is considered premature pending the preparation of a strategy, LAP or framework plan, should only be refused where there is a realistic prospect of the strategy or plan being completed within a specific timeframe.
- Fingal County Council has not commenced the preparation of a Masterplan for the lands, despite the requirement being imposed 5 years ago when the 2017 county development plan was adopted. The requirement for this Masterplan is no longer in place in the draft development plan of March 2022.
- The proposed development is consistent with the NPF, the RSES for the Eastern and Midland Region, the Urban Design Guidelines, the Design Manual for Urban Roads and Streets, the Housing Quality Guidelines and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities.
- Planning permission should be granted having regard to the pattern of development in the area and permissions granted in the area since the making of the development plan.
- Holmpatrick is defined as a “Rural Cluster” in the Fingal Development Plan 2017-2023 and includes 50 no. dwellings with facilities including a music school, special school and intellectual support services within 1 km. Pedestrian facilities are available on the main road and will be provided as part of the development. Day-to-day resident facilities are provided within Skerries, with the site being 450 m from the edge of this settlement. These services are accessible by sustainable means.
- Significant additional development is both proposed and being built out within 1km of the site, which will significantly increase the population of the surrounding area and the childcare and community facilities and provide significant new highway infrastructure in support of the proposed development.
- The proposed development would not protrude any further than the existing dwellings adjoining the site towards the sea and thereby provides an infill extension to the existing settlement and built environment.

- The part of the site which is designated as “High Amenity” is proposed to accommodate parkland, which is a permitted use in this zone.
- The principle of the development is established through the site zoning and the sensitive landscape context, to provide a bespoke, high architectural quality and minimise harm to the wider landscape.
- The Landscape and Visual Impact Assessment submitted with the planning application demonstrates that the proposed development will have “no impact” or a “slight impact” in 13 no. of the 17 no. selected viewpoints. The remaining 4 viewpoints were found to have a “moderate to significant impact”. The landscape and visual impacts of the previous proposal (ABP Ref. PL06F.247928) have been successfully addressed in this development proposal.
- The proposed development provides a logical extension to the existing adjoining development. Existing development is already provided between the R128 and the coastline, breaching the seaward side of the road and the proposed development will not protrude any further than the existing built features.
- It is unreasonable to refuse the application on the grounds of landscape impact when the only residual impact is isolated to those within the immediate proximity of the site and within one broad location beyond the immediate site boundary.
- In the event planning permission is granted, the applicant is willing to accept the planning conditions identified in the reports of the relevant internal departments of the Planning Authority and those of prescribed bodies.
- The development has been designed to provide pocket parks of 500 m² in line with development plan policy. Requiring anything beyond this is beyond development plan policy for the area and should be disregarded by the Board.

6.1.2. The appeal submission includes technical reports as follows: (1) Archaeological Assessment prepared by IAC Archaeology, (2) commentary on the engineering report of the Planning Authority as prepared by Waterman Moylan Consulting Engineers, (3) Outdoor Lighting Report prepared by Sabre Electrical Services Ltd;

and (4) a solicitor's letter which states that the applicant acquired lands at Holmpatrick Cove free of any registered rights of way. It also includes Drawing Nos. SES08022 (Public Lighting Layout) and No. P015 (Proposed Entrance Sightlines). The contents of the foregoing have been reviewed and considered in the adjudication of this appeal case.

6.2. Planning Authority Response

- 6.2.1. An appeal response was received from the Planning Authority on 27th July 2022. The Board is requested to uphold the Planning Authority's decision to refuse permission. In the event permission is granted, provision should be made in the determination for applying a S. 48 development contribution condition.

6.3. Observations

- 6.3.1. Six observations have been made on the application by: (1) Paul O'Sullivan, Hacketstown Cottages, Rush Road, Skerries, Co. Dublin, (2) Alison Ryan, Holmpatrick Cove, (3) Diarmuid McHugh, Úna Waldron and Derek Drumm, Rush Road, Skerries, Co. Dublin, (4) Olive Sarsfield, Ballyhavil Farm, Rush Road, Skerries, (5) Gerald Horan, Ballyhavil Lane, Skerries, Co. Dublin, and (6) Mary Horan, "Iniscealtra", Ballyhavil Lane, Rush Road, Skerries, Co. Dublin.
- 6.3.2. The issues which are raised can be summarised as follows: (1) overlooking and privacy impacts to adjoining dwellings, (2) land was originally zoned to accommodate 4 no. houses, with 15.1 acres of high amenity land gifted to the Council, (3) no public benefits including in current proposal, (4) development is in a rural area outside the development boundary, (5) road safety concerns - regional road is heavily trafficked, with poor horizontal and vertical alignment and restricted sightlines to the north, (6) site is located in a coastal area designated as a highly sensitive landscape, (7) the development plan seeks to prevent inappropriate development in such highly sensitive areas, (8) previous history of refusals of permission on the site, (9) substandard footpath on R128, (10) limited public lighting on regional road, (11) car dependent development which will contribute to urban sprawl, (12) the development of the lands is supported, (13) a full Masterplan was prepared for the lands and signed off by Fingal County Council in 2013, (14) there is a registered right-of-way

across the lands and an established right-of-way to the coastal lands, (15) high density proposal, (16) private open space appears to encroach onto the “HA” zoned, high amenity area, (17) flooding on regional road to the north of the development, (18) impact on visual amenities of the area – permanent damage to views of coast and offshore islands, (19) detailed Part V proposals not provided, (20) insufficient infrastructure, (21) development is out of context with surrounding area, (22) proximity of development to a working farm is a danger to the public – noise, smells and livestock, (23) Ballyhavil Lane is not a public thoroughfare, (24) agreement required between at least 2 no. landowners to deliver the Masterplan for the wider lands, (25) impact on hedgerows and trees, (26) eastern hedgerow and land drain are not owned by the developer, (27) development does not comply with the site’s zoning objectives, (28) the local objective which permitted a hotel on the open space zoned lands has been removed, (29) the development plan does not contain conflicting objectives regarding the development of the site, (30) the development is not of strategic or national importance.

- 6.3.3. The observation received from Gerald Horan includes a report prepared by ILTP Consulting which provides commentary on the proposed site access arrangements and the internal road network. The contents of this report have been reviewed and taken into consideration in the adjudication of this appeal case. A copy of this party’s observation on a previous application on the site (Planning Authority Reg. Ref. F16A/0085) is also included.

7.0 Assessment

- 7.1. I am satisfied that the main issues arising for consideration in this case include:

- Principle of the Proposed Development
- Visual Impact of the Proposed Development
- Overall Standard of Development
- Appropriate Assessment

- 7.2. Each of these issues is addressed in turn below.

7.3. Principle of the Proposed Development

- 7.3.1. Refusal reason no. 1 of the Planning Authority's decision was based on two separate considerations including: (1) the failure of the development to comply with the Holmpatrick Masterplan which provided for public leisure, a hotel, residential development, a coastal walkway and associated infrastructure on the Masterplan lands and, (2) the remote location of the site with respect to Skerries town centre, on the basis of which the development was considered contrary to the NPF, Section 28 Guidelines and the county development plan which seek to promote development in locations that are better served by existing facilities and public transport.
- 7.3.2. The Fingal Development Plan 2023-2029 has been adopted since this planning application was lodged. The Masterplan objectives which applied to the site under the 2017-2023 development plan no longer apply, and as such, this part of the refusal reason is no longer valid.
- 7.3.3. In justifying the principle of residential development at this location, the applicant submits that the proposed development accords with relevant national and regional planning policies as expanded upon in the appeal submission. The applicant also refers to proposed and permitted residential developments located approx. 1 km to the north-west of the appeal site, which are considered to lend support to the current proposal, through increased population, childcare and community facilities and highway infrastructure.
- 7.3.4. In considering the principle of the proposed development, I note that the site is located in a rural area approx. 2 km from Skerries town centre and outside of the defined development boundary of the town as illustrated on Sheet No. 5 of the 2023-2029 development plan. While I acknowledge the site adjoins the Holmpatrick Rural Cluster, I do not consider that its proximity to this existing ribbon development, offers sufficient justification for further residential development at this location having regard to national and local planning policies concerning the creation of compact settlements. I also note that the Board has refused permission for the development of the subject site on 4 no. previous occasions.
- 7.3.5. While the applicant identifies a music school, a special school and intellectual support services within 1 km of the site, I note that no other day-to-day facilities which would be required by future occupants of the proposed dwellings, (shops,

cafés, a post office, etc), are available in the immediate vicinity of the site. In my opinion, the identified developments to the north-west of the appeal site, have no bearing on the determination of this appeal case given their location within the town boundary and the separation distances arising.

- 7.3.6. In considering the principle of the proposed development, I have had regard to the recently published Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024), which expand on NPF guidance concerning the creation of sustainable and compact settlements. The strategy for towns such as Skerries is to support consolidation within and close to the existing built-up footprint. Key priorities include the delivery of sequential and sustainable urban extensions at locations closest to the urban core, which are / can be integrated into the existing built footprint. Policies CSP4, CSP34 and CSP36 of the Fingal Development Plan 2023-2029 also promote the consolidated growth of settlements such as Skerries through the sequential development of serviceable lands, focusing development within and adjacent to the core and by encouraging infill rather than greenfield development.
- 7.3.7. In my opinion, the proposed development would be inconsistent with national, regional and local planning policy regarding the efficient use of urban land and the creation of compact communities. As such, I consider that the development of this greenfield site for residential purposes at this time, would not be in accordance with the proper planning and sustainable development of the area and I recommend that planning permission be refused on this basis.

7.4. Visual Impact of the Proposed Development

- 7.4.1. Refusal reason no. 2 of the Planning Authority's decision was based on the scale, height and massing of the development and its resulting overbearing impact on the surrounding Highly Sensitive Landscape with an exceptional landscape value. As such, it was considered that the proposed development would be contrary to objectives NH35, NH36, NH37 and NH38 of the 2017-2023 development plan which seek to enhance these areas and prevent inappropriate development.
- 7.4.2. The applicant submits that the proposed development is a logical extension to the adjoining development at Holmpatrick Rural Cluster. It is noted that development has already been provided between the R128 and the coastline and that the proposed

development will not protrude any further than the existing built features. It is considered unreasonable to refuse permission on the grounds of landscape impact when the residual impact is isolated to those locations within the immediate proximity of the site and within one broad location beyond the immediate site boundary.

- 7.4.3. The planning application documentation includes a series of photomontages taken from 14 no. viewpoints surrounding the site. The impact of the proposed development on views from Ballyhavil Lane which adjoins the site to the south (viewpoint no. 5) will range from “moderate” to “significant”. The impact on views from the site entrance on the R128 will be “slight” (viewpoint no. 6). The impact on views from the R128 to the north-west of the site (viewpoint no. 7) will range from “moderate” to “significant”.
- 7.4.4. Viewpoint no. 9 is taken from the junction of the R128 and Shenick Road to the north, while viewpoint no. 10 is where the R128 meets the coast, also to the north. In both views, the proposed development is visible on the crest of the raised ground to the south. The impact of the proposed development is assessed as “moderate” for viewpoint no. 9 and “moderate” to “significant” for viewpoint no. 10.
- 7.4.5. Viewpoint nos. 11 and 12 are taken from Skerries Beach, with the proposed development likely to be visible in the distance from the northern end of the beach (viewpoint no. 12). Overall, the impact from this location ranges from none to “slight”.
- 7.4.6. Viewpoint nos. 12, 13 and 14 relate to views from Red Island, more than 2km from the appeal site. The potential for the proposed development to result in a large change to the visual environment in views from this location is low, with the impact assessed as “slight”. The proposed development has been assessed as having no impact from the remaining viewpoints.
- 7.4.7. The site is of a Coastal Character Type and forms part of a Highly Sensitive Landscape, with exceptional landscape value. Several development plan policies seek to protect such landscapes from inappropriate development. There is also an objective included in the development plan to preserve views along the R128 to the west of the site. Thus, while the site is subject to a residential land use zoning, it is also subject to landscape designations which require that development must be sensitively designed to ensure no significant negative visual impacts arise.

- 7.4.8. The site comprises agricultural land which is elevated at its southern end and slopes downwards in a north-easterly direction towards the coast. Arising from the foregoing, and the generally open character of the northern portion of the lands, the site is visible in coastal views from the north and at certain locations along the R128. Any development on the subject site will result in a visual impact of foot of the altered character of the existing agricultural landscape.
- 7.4.9. I acknowledge the applicant has sought to minimise the visual impact of the proposed development by arranging each of the dwellings as 3 no. separate building volumes with mono-pitch, green roof profiles. Notwithstanding the foregoing, the proposed unit sizes are generous, with floor areas ranging from 186 – m² to 198 m² and maximum overall building heights of 7.6 m. In my opinion, the scale and massing of these residential dwellings would be inappropriate in this Highly Sensitive Landscape with an exceptional landscape value, and that the residential zoning of the site alone, is not sufficient to justify the development as proposed. In my opinion, the proposed development would have an unacceptable impact on the landscape character of the area, and I recommend that planning permission be refused on this basis.

7.5. Overall Standard of Development

- 7.5.1. All the dwellings have 4 no. bedrooms, and as such, the proposed development provides no unit mix. Given the size of the units and their coastal location, this residential scheme would likely only appeal to a very limited section of the housing market. Section 14.6.2 of the development plan requires new developments to include a mix of housing types and sizes to provide variety to a range of households. The proposed development does not meet this requirement.
- 7.5.2. The overall quantum of communal open space exceeds the required standards and is subdivided into 4 no. separate parcels. There is no continuous public footpath throughout the estate linking these spaces, with the 2 no. central spaces being enclosed by the internal road network on 2 of 3 sides. The open space located closest to the site entrance, is largely tucked away behind the adjoining dwelling, resulting in reduced passive surveillance from elsewhere within the estate. In my opinion, the inclusion of more centrally located communal open space overlooked by

the adjoining dwellings would have resulted in a more successful design outcome on the site.

- 7.5.3. I note that these issues were identified by Fingal County Council's Planning Officer and the Parks Department but did not form part of the Planning Authority's refusal reasons. As such, I would highlight to the Board that these matters constitute new issues.

7.6. Appropriate Assessment – Screening

- 7.6.1. The planning application documentation includes an AA screening report. The subject site is not located within or directly adjacent to any Natura 2000 site, and as such, there is no potential for **direct impacts** to occur.
- 7.6.2. Four European sites are located to the east/north-east within the Irish Sea at minimum separation distances ranging from approx. 140 m – 2.6 km (see table below). The qualifying interests and conservation objectives for these sites are listed in Appendix 3.

Site Name	Site Code	Min. separation distance
Rockabill to Dalkey Island SAC	003000	2.0 km
Skerries Island SPA	004122	0.8 km
Rockabill SPA	004014	2.6 km
North-west Irish Sea SPA	004236	140 m

- 7.6.3. In considering the potential for **indirect impacts** to occur, I note that potential pathways exist between the appeal site and the above referenced European sites on foot of hydrological linkages, with the SPAs having an additional pathway via potential ex-situ feeding/foraging habitat for SCI (special conservation interest) bird species within the vicinity of the appeal site.
- 7.6.4. The considerable marine buffer which exists between the appeal site and **Rockabill to Dalkey Island SAC** will provide a level of mixing, dilution and dispersion significant enough to exclude the possibility of significant effects arising from construction/operational surface water runoff. There is also a relatively low volume of any potential surface water runoff and/or groundwater discharge containing

sediments/pollutants in relation to the receiving marine habitat of the SAC.

Therefore, there is no possibility of significant effects on Rockabill to Dalkey Island SAC and this site can be screened out from any further assessment.

- 7.6.5. There is no possibility of significant effects arising to **Rockabill SPA** due to: (i) the scale of the development, which is small relative to the large areas of similarly suitable ex-situ habitat for the qualifying interests of this SPA outside of the immediate vicinity of the appeal site, and (ii) the separation distances arising. Therefore, this site can also be screened out from any further assessment.
- 7.6.6. There is the potential for likely significant effects on **Skerries Islands SPA** and **North-west Irish Sea SPA** due to the presence of a hydrological and hydrogeological link between the proposed development and these SPAs arising from: (i) construction/operational run-off through the existing surface water drainage ditches or as overland runoff to the Irish Sea, and (ii) the potential for construction/operational groundwater contamination to flow to the Irish Sea. There is also the possibility of significant in-combination effects on water quality arising from surface water runoff and/or disturbance of SCI bird species arising from construction-related increases in noise, emissions and visual stimuli should the construction of a planned greenway, which extends along the coast to the east of the site, coincide with the construction phase of the proposed development. This greenway forms part of the NTA Greater Dublin Area Cycle Network Plan which is proposed to provide a complete pedestrian and cycling route along the coast between Balbriggan and Howth. Therefore, the undertaking of Appropriate Assessment in relation to these sites is required.
- 7.6.7. There is no possibility of significant effects via other pathways on Skerries Island SPA and North-west Irish Sea SPA due to the separation distances arising and the availability of large areas of similarly suitable ex-situ habitat for qualifying interests of these SPAs outside of the immediate vicinity of the appeal site.

7.6.8. Indirect pathways also exist via potential ex-situ site usage by SCI bird species in the vicinity of the proposed development for an additional 9 no. SPAs within 20 km of the appeal site as follows:

Site Name	Site Code	Min. separation distance
Rogerstown Estuary SPA	004015	5.0 km
Lambay Island SPA	004069	8.1 km
Malahide Estuary SPA	004025	10.2 km
River Nanny Estuary and Shore SPA	004158	12.3 km
Baldoyle Bay SPA	004016	16.0 km
Ireland's Eye SPA	004117	16.7 km
North Bull Island SPA	004006	19.3 km
Boyne Estuary SPA	004080	19.6 km
Howth Head Coast SPA	004113	19.3 km

7.6.9. The qualifying interests and conservation objectives for these sites are listed in Appendix 3. There is no possibility of significant effects arising to **Rogerstown Estuary SPA, Lambay Island SPA, Malahide Estuary SPA, River Nanny Estuary and Shore SPA, Baldoyle Bay SPA, Ireland's Eye SPA, North Bull Island SPA, Boyne Estuary SPA and Howth Head Coast SPA** due to: (1) the scale of the development, which is small relative to the large areas of similarly suitable ex-situ habitat for the qualifying interests of these SPAs outside of the immediate vicinity of the appeal site, and (2) the separation distances arising. Therefore, these sites can be screened out from any further assessment.

7.7. Appropriate Assessment

- 7.7.1. The planning application documentation includes a NIS. There will be no **direct impacts** on **Skerries Islands SPA** and **North-west Irish Sea SPA** on foot of the proposed development. There is the potential for **indirect impacts** on the water quality of these SPAs on foot of: (i) construction / operational runoff through the existing surface water drainage ditches located at the northern and northeastern site boundaries which carry surface water towards the Irish Sea; (ii) the potential for construction / operational overland surface water runoff to reach the Irish Sea; and, (iii) potential construction/operational groundwater contamination flow to the Irish Sea. These potential effects on water quality also have the potential to cause secondary significant effects to population densities and/or disturbance of SCI species of these SPAs.
- 7.7.2. A range of mitigation measures will be implemented to ensure no contaminated waters enter the Irish Sea during the **construction phase** of the proposed development. These measures will also address the potential for groundwater contamination and ensure there will be no significant cumulative effects should the construction period of the proposed development coincide with that of the proposed greenway to the east of the site. These mitigation measures are as follows:
- All works will comply with all statutory legislation including the Local Government (Water Pollution) Acts, 1977 and 1990.
 - Site personnel will be trained in the implementation of environmental control and emergency procedures.
 - Trenched double-silt fencing will be installed along the north-eastern site boundary to act as a temporary sediment control device. The fencing will be inspected twice daily for any signs of contamination or excessive silt deposits. Ponded water will be pumped from the trench to a sediment tank and discharged based on site authorisations or disposed of by a permitted waste contractor.
 - No wastewater generated on site will be released into nearby drains.
 - Provision of designated impermeable cement wash-out areas.

- Run-off from working areas or exposed soil will be channelled and intercepted for discharge to silt-traps or lagoons, with over-flows directed to land rather than a watercourse.
- Silt water generated on site will be treated using silt traps / settlement ponds.
- All open ditches adjacent to areas of proposed works will be protected by silt fencing or straw bales, including settlement ponds.
- Where possible, works will not be carried during periods of heavy rainfall.
- Erosion control measures will be regularly maintained during the construction phase.
- Double handling of materials will be avoided and where not possible, designated temporary material storage areas will be used – at least 10 m from any surface water features, ditches, etc.
- Installation of temporary hydrocarbon interceptor facilities.
- Refuelling of plant will only be carried out at designated refuelling stations.
- Only emergency breakdown maintenance will be carried out on site.
- Fuels stored in bunded areas in accordance with best practice.
- Waste from on-site welfare facilities to be removed by licenced waste disposal contractor.

7.7.3. A range of mitigation measures are also proposed to address the potential for significant effects to occur to the SPAs during the **operational phase** of the development as follows:

- The inclusion of 2 no. sub-catchments in the surface water management system, with the main catchment attenuating surface water through a detention basin. Surface water runoff will be discharged at a restricted rate by a hydrobrake in accordance with the requirements of the Planning Authority and the GDSDS.
- The inclusion of a soakaway in the secondary catchment to attenuate surface water.

- Inclusion of a petrol interceptor in the surface water management system to treat runoff and remove pollutants.
- Permeable paving will be used in the car parking areas and other areas around the site to provide interception treatment to surface water runoff. Swales will also be used.

7.7.4. Subject to the implementation of the identified mitigation measures, the potential for significant effects to arise to Skerries Islands SPA and North-west Irish Sea SPA during the construction and operational phases is negligible.

7.7.5. Having regard to the foregoing, I consider it reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans or projects, would not adversely affect the integrity of **Skerries Islands SPA (site code: 004122) and North-west Irish Sea SPA (site code: 004236)**, or any other European Site, in view of the site's Conservation Objectives.

8.0 Recommendation

8.1. I recommend that planning permission be refused for the proposed development for the reasons and considerations set out hereunder.

9.0 Reasons and Considerations

9.1. The strategy for the development of towns such as Skerries, as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), is to support consolidation within and close to the existing built-up footprint, through the delivery of sequential and sustainable urban extensions. The development of this greenfield site, which is located in a rural area approx. 2km from the town centre of Skerries, with insufficient services and facilities to support future occupants of the proposed residential scheme, would be contrary to these Guidelines and to Policy CSP4 of the Fingal Development Plan 2023-2029 regarding sequential development and Policy CSP34 and Policy CSP36 of the development plan regarding consolidated, compact growth in Self-Sustaining Towns.

Thus, the proposed development would be contrary to the proper planning and sustainable development of the area.

- 9.2. Having regard to the scale and massing of the proposed residential dwellings on a greenfield site in a rural, coastal area designated as a Highly Sensitive Landscape with exceptional landscape value, it is considered that the proposed development would seriously injure the visual amenities and landscape character of the area and would be contrary to Policy GINHP25 and Objectives GINHO58 and GINHO59 of the Fingal Development Plan 2023-2029 which seek, inter alia, to protect the character and value of sensitive landscapes. As such, the proposed development would be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Louise Treacy
Senior Planning Inspector

19th February 2024

Appendix 1 - Form 1
EIA Pre-Screening
[EIAR not submitted]

An Bord Pleanála Case Reference	313944-22		
Proposed Development Summary	18 no. 2-storey detached dwellings and associated development.		
Development Address	Holmpatrick, Rush Road, Skerries, Co. Dublin		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	X
		No	
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes			EIA Mandatory EIAR required
No		X	Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
		Threshold	Comment (if relevant)
No			Conclusion No EIAR or Preliminary Examination required
Yes		X	Proceed to Q.4

4. Has Schedule 7A information been submitted?		
<input checked="checked" type="radio"/> No		Preliminary Examination required
<input type="radio"/> Yes		Screening Determination required

Inspector: _____ Date: _____

Form 2

EIA Preliminary Examination

An Bord Pleanála Case Reference	313944-22	
Proposed Development Summary	18 no. 2-storey detached dwellings and associated development.	
Development Address	Holmpatrick, Rush Road, Skerries, Co. Dublin.	
The Board carries out a preliminary examination [Ref. Art. 109(2)(a), Planning and Development Regulations 2001 (as amended)] of, at least, the nature, size or location of the proposed development having regard to the criteria set out in Schedule 7 of the Regulations.		
	Examination	Yes/No/ Uncertain
Nature of the Development Is the nature of the proposed development exceptional in the context of the existing environment? Will the development result in the production of any significant waste, emissions or pollutants?	<p>The subject site is currently agricultural in nature but is adjoined by residential development to the west, north-west and south.</p> <p>The removal of topsoil and C&D waste can be managed through an agreed Construction and Environmental Management Plan. Localised construction impacts will be temporary.</p>	<p>No</p> <p>No</p>
Size of the Development Is the size of the proposed development exceptional in the context of the existing environment? Are there significant cumulative considerations having regard to other existing and/or permitted projects?	<p>The proposed development would comprise an extension to the residential development within the Holmpatrick Rural Cluster. The size of the development would not be exceptional in the context of the existing development.</p> <p>The site adjoins a cluster of one-off rural dwellings which form part of the Holmpatrick Rural Cluster. The remaining adjoining lands are agricultural in character. There are no significant permitted developments in the immediate vicinity of the site.</p>	<p>No</p> <p>No</p>
Location of the Development Is the proposed development located on, in, adjoining or does it	The site is hydrologically connected to Skerries Island SPA (site code: 004122) and North-west Irish Sea SPA (site code: 004236). An Appropriate Assessment of the potential for indirect surface water and groundwater water pollution impacts and	No

<p>have the potential to significantly impact on an ecologically sensitive site or location?</p> <p>Does the proposed development have the potential to significantly affect other significant environmental sensitivities in the area?</p>	<p>secondary impacts to population densities and/or disturbance of SCI species of these SPAs to arise has determined that the proposed development, individually or in combination with other plans or projects, would not adversely affect the integrity of these sites, or any other European sites, in view of their conservation objectives.</p> <p>No</p>	<p>No</p>
Conclusion		
<p>There is no real likelihood of significant effects on the environment.</p> <p>EIA not required.</p>	<p>There is significant and realistic doubt regarding the likelihood of significant effects on the environment.</p> <p>Schedule 7A Information required to enable a Screening Determination to be carried out.</p>	<p>There is a real likelihood of significant effects on the environment.</p> <p>EIAR required.</p>

Inspector: _____

Date: _____

DP/ADP: _____

Date: _____

(only where Schedule 7A information or EIAR required)

Appendix 3: Natura 2000 Sites Qualifying Interests & Conservation Objectives

Rockabill to Dalkey Island SAC (site code: 003000)	
Qualifying Interests	Reefs [1170] Phocoena phocoena (Harbour Porpoise) [1351]
Conservation Objective(s)	To maintain the favourable conservation condition of Reefs in Rockabill to Dalkey Island SAC [1170] To maintain the favourable conservation condition of Harbour porpoise in Rockabill to Dalkey Island SAC [1351]

Skerries Island SPA (site code: 004122)	
Qualifying Interests	Cormorant (Phalacrocorax carbo) [A017] Shag (Phalacrocorax aristotelis) [A018] Light-bellied Brent Goose (Branta bernicla hrota) [A046] Purple Sandpiper (Calidris maritima) [A148] Turnstone (Arenaria interpres) [A169] Herring Gull (Larus argentatus) [A184]
Conservation Objective(s)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

Rockabill SPA (site code: 004014)	
Qualifying Interests	Purple Sandpiper (Calidris maritima) [A148] Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194]
Conservation Objective(s)	To maintain the favourable conservation condition of Purple Sandpiper in Rockabill SPA [A148] To maintain the favourable conservation condition of Roseate Tern in Rockabill SPA [A192]

	<p>To maintain the favourable conservation condition of Common Tern in Rockabill SPA [A193]</p> <p>To maintain the favourable conservation condition of Arctic Tern in Rockabill SPA [A194]</p>
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North-west Irish Sea SPA (site code: 004236)	
Qualifying Interests	<p>Red-throated Diver (<i>Gavia stellata</i>) [A001]</p> <p>Great Northern Diver (<i>Gavia immer</i>) [A003]</p> <p>Fulmar (<i>Fulmarus glacialis</i>) [A009]</p> <p>Manx Shearwater (<i>Puffinus puffinus</i>) [A013]</p> <p>Cormorant (<i>Phalacrocorax carbo</i>) [A017]</p> <p>Shag (<i>Phalacrocorax aristotelis</i>) [A018]</p> <p>Common Scoter (<i>Melanitta nigra</i>) [A065]</p> <p>Little Gull (<i>Larus minutus</i>) [A177]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Common Gull (<i>Larus canus</i>) [A182]</p> <p>Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]</p> <p>Herring Gull (<i>Larus argentatus</i>) [A184]</p> <p>Great Black-backed Gull (<i>Larus marinus</i>) [A187]</p> <p>Kittiwake (<i>Rissa tridactyla</i>) [A188]</p> <p>Roseate Tern (<i>Sterna dougallii</i>) [A192]</p> <p>Common Tern (<i>Sterna hirundo</i>) [A193]</p> <p>Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p> <p>Little Tern (<i>Sterna albifrons</i>) [A195]</p> <p>Guillemot (<i>Uria aalge</i>) [A199]</p> <p>Razorbill (<i>Alca torda</i>) [A200]</p> <p>Puffin (<i>Fratercula arctica</i>) [A204]</p>

Conservation Objective(s)	<p>To maintain the favourable conservation condition of red-throated diver at North-west Irish Sea SPA [A001]</p> <p>To maintain the favourable conservation condition of great northern diver at North-west Irish Sea SPA [A003]</p> <p>To restore the favourable conservation condition of fulmar in North-west Irish Sea SPA [A009]</p> <p>To maintain the favourable conservation condition of manx shearwater in North-west Irish Sea SPA [A013]</p> <p>To restore the favourable conservation condition of cormorant in North-west Irish Sea SPA [A017]</p> <p>To restore the favourable conservation condition of shag in North-west Irish Sea SPA [A018]</p> <p>To maintain the favourable conservation condition of common scoter at North-west Irish Sea SPA [A065]</p> <p>To maintain the favourable conservation condition of black-headed gull at North-west Irish Sea SPA [A179]</p> <p>To maintain the favourable conservation condition of common gull at North-west Irish Sea SPA [A182]</p> <p>To maintain the favourable conservation condition of lesser black-backed gull in North-west Irish Sea SPA [A183]</p> <p>To restore the favourable conservation condition of herring gull in North-west Irish Sea SPA [A184]</p> <p>To maintain the favourable conservation condition of great black-backed gull at North-west Irish Sea SPA [A187]</p> <p>To restore the favourable conservation condition of kittiwake in North-west Irish Sea SPA [A188]</p> <p>To maintain the favourable conservation condition of roseate tern in North-west Irish Sea SPA [A192]</p> <p>To maintain the favourable conservation condition of common tern in North-west Irish Sea SPA [A193]</p> <p>To maintain the favourable conservation condition of Arctic tern in North-west Irish Sea SPA [A194]</p> <p>To maintain the favourable conservation condition of little tern in North-west Irish Sea SPA [A195]</p>
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	<p>To maintain the favourable conservation condition of guillemot in North-west Irish Sea SPA [A199]</p> <p>To maintain the favourable conservation condition of razorbill in North-west Irish Sea SPA [A200]</p> <p>To restore the favourable conservation condition of puffin in North-west Irish Sea SPA [A204]</p> <p>To maintain the favourable conservation condition of little gull at North-west Irish Sea SPA [A862]</p>
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Rogerstown Estuary SPA (site code: 004015)	
Qualifying Interests	<p>Greylag Goose (<i>Anser anser</i>) [A043]</p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Shoveler (<i>Anas clypeata</i>) [A056]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Wetland and Waterbirds [A999]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Greylag Goose in Rogerstown Estuary SPA [A043]</p> <p>To maintain the favourable conservation condition of Light-bellied Brent Goose in Rogerstown Estuary SPA [A046]</p> <p>To maintain the favourable conservation condition of Shelduck in Rogerstown Estuary SPA [A048]</p> <p>To maintain the favourable conservation condition of Shoveler in Rogerstown Estuary SPA [A056]</p>

	<p>To maintain the favourable conservation condition of Oystercatcher in Rogerstown Estuary SPA [A130]</p> <p>To maintain the favourable conservation condition of Ringed Plover in Rogerstown Estuary SPA [A137]</p> <p>To maintain the favourable conservation condition of Grey Plover in Rogerstown Estuary SPA [A141]</p> <p>To maintain the favourable conservation condition of Knot in Rogerstown Estuary SPA [A143]</p> <p>To maintain the favourable conservation condition of Dunlin in Rogerstown Estuary SPA [A149]</p> <p>To maintain the favourable conservation condition of Black-tailed Godwit in Rogerstown Estuary SPA [A156]</p> <p>To maintain the favourable conservation condition of Redshank in Rogerstown Estuary SPA [A162]</p> <p>To maintain the favourable conservation condition of wetland habitat in Rogerstown Estuary SPA as a resource for the regularly occurring migratory waterbirds that utilise it [A999]</p>
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Lambay Island SPA (site code: 004069)	
Qualifying Interests	<p>Fulmar (<i>Fulmarus glacialis</i>) [A009]</p> <p>Cormorant (<i>Phalacrocorax carbo</i>) [A017]</p> <p>Shag (<i>Phalacrocorax aristotelis</i>) [A018]</p> <p>Greylag Goose (<i>Anser anser</i>) [A043]</p> <p>Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]</p> <p>Herring Gull (<i>Larus argentatus</i>) [A184]</p> <p>Kittiwake (<i>Rissa tridactyla</i>) [A188]</p> <p>Guillemot (<i>Uria aalge</i>) [A199]</p> <p>Razorbill (<i>Alca torda</i>) [A200]</p> <p>Puffin (<i>Fratercula arctica</i>) [A204]</p>
Conservation Objective(s)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

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Malahide Estuary SPA (site code: 004025)	
Qualifying Interests	<p>Great Crested Grebe (<i>Podiceps cristatus</i>) [A005]</p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Pintail (<i>Anas acuta</i>) [A054]</p> <p>Goldeneye (<i>Bucephala clangula</i>) [A067]</p> <p>Red-breasted Merganser (<i>Mergus serrator</i>) [A069]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Wetland and Waterbirds [A999]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Great Crested Grebe in Malahide Estuary SPA [A005]</p> <p>To maintain the favourable conservation condition of Light-bellied Brent Goose in Malahide Estuary SPA [A046]</p> <p>To maintain the favourable conservation condition of Shelduck in Malahide Estuary SPA [A048]</p> <p>To maintain the favourable conservation condition of Pintail in Malahide Estuary SPA [A054]</p> <p>To maintain the favourable conservation condition of Goldeneye in Malahide Estuary SPA [A067]</p>

	<p>To maintain the favourable conservation condition of Red-breasted Merganser in Malahide Estuary SPA [A069]</p> <p>To maintain the favourable conservation condition of Oystercatcher in Malahide Estuary SPA [A130]</p> <p>To maintain the favourable conservation condition of Golden Plover in Malahide Estuary SPA [A140]</p> <p>To maintain the favourable conservation condition of Grey Plover in Malahide Estuary SPA [A141]</p> <p>To maintain the favourable conservation condition of Knot in Malahide Estuary SPA [A143]</p> <p>To maintain the favourable conservation condition of Dunlin in Malahide Estuary SPA [A149]</p> <p>To maintain the favourable conservation condition of Black-tailed Godwit in Malahide Estuary SPA [A156]</p> <p>To maintain the favourable conservation condition of Bar-tailed Godwit in Malahide Estuary SPA [A157]</p> <p>To maintain the favourable conservation condition of Redshank in Malahide Estuary SPA [A162]</p> <p>To maintain the favourable conservation condition of the wetland habitat in Malahide Estuary SPA as a resource for the regularly-occurring migratory waterbirds that utilise it [A999]</p>
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River Nanny Estuary and Shore SPA (site code: 004158)	
Qualifying Interests	<p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Sanderling (<i>Calidris alba</i>) [A144]</p> <p>Herring Gull (<i>Larus argentatus</i>) [A184]</p> <p>Wetland and Waterbirds [A999]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Oystercatcher in River Nanny Estuary and Shore SPA [A130]</p> <p>To maintain the favourable conservation condition of Ringed Plover in River Nanny Estuary and Shore SPA [A137]</p> <p>To maintain the favourable conservation condition of Golden Plover in River Nanny Estuary and Shore SPA [A140]</p> <p>To maintain the favourable conservation condition of Knot in River Nanny Estuary and Shore SPA [A143]</p> <p>To maintain the favourable conservation condition of Sanderling in River Nanny Estuary and Shore SPA [A144]</p> <p>To maintain the favourable conservation condition of Herring Gull in River Nanny Estuary and Shore SPA [A184]</p> <p>To maintain the favourable conservation condition of the wetland habitat in River Nanny Estuary and Shore SPA as a resource for the regularly-occurring migratory waterbirds that utilise it [A999]</p>

Baldoyle Bay SPA (site code: 004016)	
Qualifying Interests	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Wetland and Waterbirds [A999]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Light-bellied Brent Goose in Baldoyle Bay SPA [A046]</p> <p>To maintain the favourable conservation condition of Shelduck in Baldoyle Bay SPA [A048]</p> <p>To maintain the favourable conservation condition of Ringed Plover in Baldoyle Bay SPA [A137]</p> <p>To maintain the favourable conservation condition of Golden Plover in Baldoyle Bay SPA [A140]</p> <p>To maintain the favourable conservation condition of Grey Plover in Baldoyle Bay SPA [A141]</p> <p>To maintain the favourable conservation condition of Bar-tailed Godwit in Baldoyle Bay SPA [A157]</p> <p>To maintain the favourable conservation condition of the wetland habitat in Baldoyle Bay SPA [A999]</p>

Ireland's Eye SPA (site code: 004117)	
Qualifying Interests	<p>Cormorant (<i>Phalacrocorax carbo</i>) [A017]</p> <p>Herring Gull (<i>Larus argentatus</i>) [A184]</p> <p>Kittiwake (<i>Rissa tridactyla</i>) [A188]</p> <p>Guillemot (<i>Uria aalge</i>) [A199]</p> <p>Razorbill (<i>Alca torda</i>) [A200]</p>

Conservation Objective(s)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
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North Bull Island SPA (site code: 004006)	
Qualifying Interests	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Teal (<i>Anas crecca</i>) [A052]</p> <p>Pintail (<i>Anas acuta</i>) [A054]</p> <p>Shoveler (<i>Anas clypeata</i>) [A056]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Sanderling (<i>Calidris alba</i>) [A144]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Curlew (<i>Numenius arquata</i>) [A160]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Turnstone (<i>Arenaria interpres</i>) [A169]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Wetland and Waterbirds [A999]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Light-bellied Brent Goose in North Bull Island SPA [A046]</p> <p>To maintain the favourable conservation condition of Shelduck in North Bull Island SPA [A048]</p> <p>To maintain the favourable conservation condition of Teal in North Bull Island SPA [A052]</p>

	<p>To maintain the favourable conservation condition of Pintail in North Bull Island SPA [A054]</p> <p>To maintain the favourable conservation condition of Shoveler in North Bull Island SPA [A056]</p> <p>To maintain the favourable conservation condition of Oystercatcher in North Bull Island SPA [A130]</p> <p>To maintain the favourable conservation condition of Golden Plover in North Bull Island SPA [A140]</p> <p>To maintain the favourable conservation condition of Grey Plover in North Bull Island SPA [A141]</p> <p>To maintain the favourable conservation condition of Knot in North Bull Island SPA [A143]</p> <p>To maintain the favourable conservation condition of Sanderling in North Bull Island SPA [A144]</p> <p>To maintain the favourable conservation condition of Dunlin in North Bull Island SPA [A149]</p> <p>To maintain the favourable conservation condition of Black-tailed Godwit in North Bull Island SPA [A156]</p> <p>To maintain the favourable conservation condition of Bar-tailed Godwit in North Bull Island SPA [A157]</p> <p>To maintain the favourable conservation condition of Curlew in North Bull Island SPA [A160]</p> <p>To maintain the favourable conservation condition of Redshank in North Bull Island SPA [A162]</p> <p>To maintain the favourable conservation condition of Turnstone in North Bull Island SPA [A169]</p> <p>To maintain the favourable conservation condition of Black-headed Gull in North Bull Island SPA [A179]</p> <p>To maintain the favourable conservation condition of the wetland habitat in North Bull Island SPA as a resource for the regularly occurring migratory waterbirds that utilise it [A999]</p>
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Boyne Estuary SPA (004080)	
Qualifying Interests	<p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Lapwing (<i>Vanellus vanellus</i>) [A142]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Sanderling (<i>Calidris alba</i>) [A144]</p> <p>Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Turnstone (<i>Arenaria interpres</i>) [A169]</p> <p>Little Tern (<i>Sterna albifrons</i>) [A195]</p> <p>Wetland and Waterbirds [A999]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Shelduck in Boyne Estuary SPA [A048]</p> <p>To maintain the favourable conservation condition of Oystercatcher in Boyne Estuary SPA [A130]</p> <p>To maintain the favourable conservation condition of Golden Plover in Boyne Estuary SPA [A140]</p> <p>To maintain the favourable conservation condition of Grey Plover in Boyne Estuary SPA [A141]</p> <p>To maintain the favourable conservation condition of Lapwing in Boyne Estuary SPA [A142]</p> <p>To maintain the favourable conservation condition of Knot in Boyne Estuary SPA [A143]</p> <p>To maintain the favourable conservation condition of Sanderling in Boyne Estuary SPA [A144]</p> <p>To maintain the favourable conservation condition of Black-tailed Godwit in Boyne Estuary SPA [A156]</p>

	<p>To maintain the favourable conservation condition of Redshank in Boyne Estuary SPA [A162]</p> <p>To maintain the favourable conservation condition of Turnstone in Boyne Estuary SPA [A169]</p> <p>To maintain the favourable conservation condition of Little Tern in Boyne Estuary SPA [A195]</p> <p>To maintain the favourable conservation condition of the wetland habitat in Boyne Estuary SPA as a resource for the regularly-occurring migratory waterbirds that utilise it [A999]</p>
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Howth Head Coast SPA (site code: 004113)	
Qualifying Interests	Kittiwake (<i>Rissa tridactyla</i>) [A188]
Conservation Objective(s)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.