



An
Bord
Pleanála

Inspector's Report ABP-322001-25

Development	Construction of all weather pitch with floodlights and netting with all associated site works
Location	Howth Celtic Football Club, Carrickbrack Road, Sutton, Dublin 13, D13 X863.
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F24A/0843E
Applicant(s)	Howth Celtic Football Club
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Howth Celtic Football Club
Observer(s)	Old Castle Avenue Residents Association
Date of Site Inspection	13 th of May 2025
Inspector	Darragh Ryan

1.0 Site Location and Description

- 1.1. The site is located on the grounds of Howth Celtic Football Club. The Proposed Development Site is located on the 'Tombolo of Sutton' and is bounded to the south by Carrickbrack Road and opposite St. Fintan's National School. Immediately to the north and east is Howth Demense which includes Deer Park Golf Course and the wider surrounds of Howth Castle.
- 1.2. The site is bounded to the West by residential development known as Old Castle Avenue. The site itself is developed with natural playing pitches and one existing astro turf pitch. There is existing netting and low floodlighting on site. The site is bounded by mature boundaries of mixed variety with native and non-native species to the north, east and west of the site. The stated site area is 1.94ha.

2.0 Proposed Development

2.1. The Proposed Development will entail the following:

- The provision of a new 100m x 59m all-weather training pitch to replace the existing grass pitch. This pitch is proposed to be located within the northeastern section of the site. The pitch would be set off the northern boundary by c. 11.9m reducing to c. 7.9m, off the northwestern boundary by ca. 11m, increasing to ca. 39m, off the boundary with Carrickbrack Road by c. 87m and off the southeastern boundary by c. 3m.
- To enable the Proposed Development, it is necessary to raise the level of part of the Site by c. 0.7m.
- It is proposed to provide 6 no. 15m high floodlighting columns, proportionately located around the pitch.
- The Development includes for the provision of pitch perimeter fencing consisting of 2.4m high mesh fence and 6m high ball-catch netting.
- The widening of the existing vehicular entrance onto Carrickbrack Road from c. 8.5m to c. 10.6m. This element would involve provision of new rendered

blockwork piers and reconstituted stone capping, c. 2.1m (h) and the provision of galvanised steel swing gates, c. 1.8m (h).

- The provision of on-site reinforcement grass parking area to be located along the southwestern part of the Site

3.0 Planning Authority Decision

3.1. The Planning Authority issued Decision to refuse permission for the following reasons:

Having regard to the information provided to the Planning Authority, being the competent authority on the basis of the precautionary principle, contend that there is reasonable scientific doubt regarding the robustness of the findings in the Appropriate Assessment Screening Report with particular reference to Light-Bellied Brent Geese to demonstrate that likely significant effects on ex-situ factors can be excluded for the Baldoyle Bay SPA, North Bull Island Spa and Malahide Estuary SPA. In this regard the Planning Authority is not satisfied that the proposed development individually or in combination with other plans or projects would not adversely affect the integrity of European Sites, Baldoyle SPA, North Bull Island Spa and Malahide Estuary SPA in view of the sites conservation objectives. The development as proposed would be contrary to Objective DMS0145 of the Fingal Development Plan 2023 – 2029 which seeks to ensure that sufficient information is provided as part of the development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity be made.

3.2. Planning Authority Reports

3.2.1. There are two Planning authority reports on file. The first planning authority report addressed the following:

- Principle of development considered acceptable in light of land use zoning objective
- The applicant has supplied a visual impact assessment containing various photomontages of the subject site. Views across the site would be preserved due to set back from Carrickbrack Road. Having regard to the proximity of the

site to the adjacent dwellings and the intensification of the proposed development, it is recommended that the existing hours of 2130 be retained.

- There is no objection to the proposed car and bicycle parking. Proposed sightlines in excess of the requirement can be achieved in this location.
- The submitted a tree survey, Arboriculture Impact Assessment and Arboricultural Method Statement – matters relating to biodiversity and amenity are noted. It is considered there would be no significant impact in this regard.
- The grounds of Howth Celtic FC are frequently used as ex-situ feeding grounds for Light-bellied brent geese which are Qualifying Interest species of Baldoyle Bay SPA and Malahide Estuary SPA, as well as North Bull Island SPA. This aspect had been prematurely screened out of the assessment as cited in the reason for refusal relating to Plan Ref F23A/0277.
- The proposed development would result in a permanent loss of 33% approx. of the available amenity grassland on the site excluding the area in which the existing clubhouse is sited. In Section 4.3.4 Disturbance and/or Displacement of Species of the Screening Report it notes the lands in the vicinity of the subject site have the potential to provide ex-situ habitat to SCI bird populations associated with SPA's which include Light-bellied Brent Goose (LBBG). It is considered the findings of Light-bellied brent geese's droppings onsite recorded during the surveys indicates the continued use of the site by the LBBG rather than from passing birds as stated. It is considered that seven days of surveys in one winter period is insufficient to prove that it is not been used continuously. It remains uncertain whether the proposed development will negatively impact the qualifying interests of a Protected Site.

3.2.2. The second planning authority report addressed the following.

- The applicant supplied an updated Appropriate Assessment Screening where it references historical surveys of the LBBG in the area. An extensive Dublin - wide Winter Bird Survey, the LBBG were only recorded on date in 2022. It concludes based on the extensive survey data carried out that the proposed development would not result in a loss of ground for regular foraging by the LBBG or accessibility to foraging, therefore it is deemed there is no significant

impact for the conservation of the species as set out in the special conservation interests of the SPA's.

- In not accepting the findings of the updated Appropriate Assessment the planning authority considered that the conclusions of the updated Appropriate Assessment Screening are not robust enough to enable a fully informed assessment of the impacts on biodiversity as per Objective DMS0145 of the Fingal Development Plan 2023 to 2029.

The reason for this conclusion is that there is evidence that the site is being used as an ex-situ habitat. The site is being used by Light-bellied Brent Geese which are Qualifying Interest Species of Baldoyle SPA and Malahide Estuary SPA as well as North Bull Island SPA. The development would see the permanent loss of 1/3 of the amenity grassland, which would have unacceptable impacts for ex-situ feeding sites which would have the potential to affect this species in the long term.

A refusal was recommended on this basis.

3.2.3. Other Technical Reports

- Parks and Green Infrastructure Division – Site zoned High Amenity “Highly Sensitive Landscape”. The site is located within the Buffer Zone of the Howth Special Amenity Area. Recommends conditions.
- Ecologist - The applicant is requested to accept that the evidence indicates that the site is utilised as an exsitu feeding site by Light-bellied brent geese and assess the potential for significant effects accordingly in light of this species Conservation Objectives. The applicant should utilise any available studies such as Scott Cawley (2017) and Enviroguide (2024), or further site surveys, to demonstrate that the permanent loss of this feeding ground for Light-bellied brent geese will not have a significant effect on this SCI with respect 1% International or 1% Nationally Important numbers for this species.
- Public Lighting Section - The lighting design submitted for the sports field is deemed compliant under current lighting requirement.
- Water Services Department – no objection subject to recommended conditions

- Transportation Planning Section – The applicant is proposing to provide 28 car parking spaces, which is acceptable to the Transportation Planning Section. 45 no bicycle spaces are considered acceptable. The sightlines can be achieved at the location of the proposed widened and reconfigured entrance. Recommended conditions in the event of grant of planning permission.

3.3. Prescribed Bodies

- None

3.4. Third Party Observations

There are two third party submissions on file. The issues raised are also raised in the observations submitted as part of the appeal. The observations can be briefly summarised under the following headings:

3.4.1. Appropriate Assessment

There are issues with respect to the AA screening as submitted. The site is centrally located between a number of designated sites. Adjacent sites should be considered in the Appropriate Assessment Screening. In combination effects also need to be examined.

There are a number of birds that frequent the site including the Light Bellied Brent Geese. The numbers of hours of bird surveys between all different bird surveys only accounts for 8 hours over a 4 month period at Howth Celtic Football Club.

The development is being proposed without any offset in terms of nature restoration or rewilding elsewhere in the immediate area. The construction of an Astro turf pitch, involving the raising and levelling of the site and the installation of the car park, means the site will be irretrievably lost to nature.

No reference to the increase in microplastics in the local environment has been considered.

3.4.2. Flood Risk

The issue of flooding has not been adequately addressed by the applicant. The residents of adjacent Old Castle Avenue point to a recent flood event and indicate flooding has occurred in the past and raising of the ground by 0.7m may exacerbate this issue where there is no attenuation on site.

3.4.3. Impact on residential amenity

The floodlighting will result in a significant negative impact on residential amenity.

Increased noise levels as a result of the proposed development.

3.4.4. There is a submission on file from Cllr Cathal Haughey, expressing support for the proposed development.

4.0 **Planning History**

F23A/0277 – The development will consist of a new 100m X 61m all-weather training pitch to replace existing grass pitch, 6 no 15m high lighting columns, pitch perimeter fencing consisting of 2.4m high mesh fence and 6m high ball catch netting, widening of the existing vehicular entrance onto Carrickbrack Road, on-site reinforcement grass parking area and all associated site works. REFUSE Permission:

The grounds of Howth Celtic are frequently uses as ex-situ feeding grounds for light bellied brent geese which are qualifying Interest Species of the Baldoyle SPA, Malahide Estuary SPA and North Bull Island SPA which have been prematurely screened out of the assessment.

5.0 **Policy Context**

5.1. **Fingal County Development Plan 2023 - 2029**

5.1.1. Site Zoning High Amenity

- Policy GINHP28 – Protection of High Amenity Areas – Protect High Amenity area from inappropriate development and reinforce their character, distinctiveness and sense of place.
- Objective GINH067 – seeks to ensure that development reflects and reinforces the distinctiveness and sense of place of High Amenity area

- Policy CSP23 – Howth Special Amenity Area Orders (SAAO0).

5.1.2. Chapter 9.6.9 Protection of Trees and Hedgerows

- Policy GINHP21 – Protection of Trees and Hedgerows

Protect existing woodlands, trees and hedgerows that are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management.

- Policy GINHP22 – Tree Planting

Provide for appropriate protection of trees and hedgerows, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.

- Objective GINHO44 – Tree Removal

Ensure adequate justification for tree removal and require documentation and recording of reason where felling is proposed and avoid removal of trees without adequate justification.

- Policy GINHP5:

Develop the green infrastructure network to ensure the conservation and enhancement of biodiversity, including the protection of European Sites, the provision of accessible parks, open spaces and recreational facilities (including allotments and community gardens), the sustainable management of water, the maintenance of landscape character including historic landscape character and the protection and enhancement of archaeological and heritage landscapes.”

- Objective GINHO2:

Reduce fragmentation and enhance the resilience of Fingal’s green infrastructure network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider green infrastructure network.

- Policy GINHP12:

Protect areas designated or proposed to be designated as Natura 2000 sites (i.e., Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, and Refuges for Fauna.

- Objective GINHO27:

Support the National Parks and Wildlife Service, in the maintenance and achievement of favourable conservation status for the habitats and species in Fingal by taking full account of the requirements of the Habitats and Birds Directives, in the performance of its functions.”

- Objective GINHO28:

Ensure that development does not have a significant adverse impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, and on rare and threatened species including those protected by law and their habitats.”

- Policy GINHP17:

Strictly protect areas designated or proposed to be designated as Natura 2000 sites (i.e., Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); also known as European sites) including any areas that may be proposed for designation or designated during the lifetime of this Plan.”

- Objective GINHO35:

In accordance with Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities 2010, any plans or projects that are likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects, are subject to a screening for Appropriate Assessment unless they are directly connected with or necessary to the management of a Natura 2000 site.

- Objective GINHO79:

Ensure that there is appropriate public access to the coast including the provision of coastal walkways and cycleways, while taking full account of the need to

conserve and enhance the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on European Sites and species protected by law, through Screening for Appropriate Assessment, and examine the designation of traditional walking routes thereto as public rights of way.

5.2. Natural Heritage Designations

The issue of Appropriate Assessment is central to the issues raised in the appeal. The Natura 2000 sites located within 20km of the site are listed below,

SAC -

- Baldoyle Bay SAC (IE0000199)
- Howth Head SAC (IE0000202)
- North Dublin Bay SAC (IE0000206)
- Rockabill to Dalkey Island SAC (IE00030000)
- Ireland's Eye SAC (IE0002193)
- Malahide Estuary SAC (IE 0000205)
- South Dublin Bay SAC (IE0000210)
- Lambay Island SAC (IE0000204)
- Rogerstown Estuary SAC (IE0000208)

SPA –

- North-West Irish Sea SPA (IE004236)
- Baldoyle Bay SPA (IE0004016)
- North Bull Island SPA (IE0004006)
- Ireland's Eye SPA (IE0004117)
- Howth Head Coast SPA (IE0004113)
- Malahide Estuary SPA (IE0004025)
- South Dublin Bay and River Tolka Estuary SPA (IE0004024)
- Lambay Island SPA (IE0004069)
- Rogerstown Estuary SPA (IE0004015)
- Dalkey Islands SPA (IE004172)

6.0 EIA Screening

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

7.0 The Appeal

7.1. This is a first party appeal against the decision of Fingal County Council to refuse permission. The Grounds of Appeal can be summarised as follows:

7.1.1. Misapplication of the precautionary Principle

- The precautionary principle is being applied too broadly in this case and should be used to address a genuine scientific uncertainty that prevents a fully informed risk assessment. The applicant states the evidence provided in the Appropriate Assessment Screening is sufficient to demonstrate that there will be no impact on any European Site.
- Concerns related to the light-bellied brent geese are not substantiated by the evidence provided in the Appropriate Assessment Screening.

7.1.2. Inconsistent Application of Planning Policy

- It is stated that Fingal County Council are inconsistent with their approach in applying planning policy. Portmarnock Football Club received planning permission under F23A/0115 to enlarge existing all weather pitch resulting in a combined surface area of 13,800sqm. This represents 38% of the stated site area.

7.1.3. Community Value of Howth Celtic Football Club

In refusing permission for the proposed development, it is submitted Fingal County Council has failed to properly balance the substantial community benefits provided

by Howth Celtic FC against the purported risks to conservation objectives- risks that the AA Screening Report demonstrates to be minimal.

7.1.4. Further report of Enviroguide:

1. There will be no direct loss or alteration of designated QI habitats within any European Site associated with the proposed Development
2. No direct habitat or species fragmentation related impacts are envisaged as a result of the proposed development
3. Winter Bird Surveys were conducted at the site (2023/24), with those surveys recording no usage of the site of the proposed development by Light-bellied Brent Geese.
4. Data on Light-bellied Brent Geese numbers at Howth Celtic FC and Deer Park Golf course is available from previous Natura Impact Statement submitted to Dublin City Council in 2022. This data details the numbers and locations of flocks recorded during an extensive Dublin-wide Winter Bird Survey. These details have been outlined and summarized as part of an extended desk study which aims to provide further information on the use of Howth Celtic Site and surrounding areas by SCI species between Winter 2012/2013 and Winter 2020/2021. The study indicated the site was surveyed on 29 separate dates between 2018 and 2022 and was found to contain light-bellied Brent geese on one occasion. No SCI species were identified during most recent survey over 7 separate days.

7.2.Planning Authority Response

The planning authority submitted a response to the appeal on the 27th of March 2025.

- Development assessed against the policies and objectives of the Fingal Development Plan 2023-2029.
- There is reasonable scientific doubt regarding the robustness of the findings of the Appropriate Assessment Screening report with particular reference to the Light-Bellied Brent Geese to demonstrate that likely significant effects on

ex-situ factors can be excluded for Balldoyle SPA, North Bull Island SPA and Malahide Estuary SPA.

7.3. Observations

There is a single observation on file received from the chairperson of Old Castle Residents Association, located to the west of the site. The observation is a direct response to the grounds of appeal as submitted by the applicant. The observation can be summarised as follows:

- Fingal County Council has been consistent in its approach to the site and has carried out site specific screening assessment in relation to the current site. The previous decisions of Fingal County Council have effectively served to protected the site for the shared benefit of nature and footballers.
- Contrary to the winter bird surveys as submitted by the applicant and detailed in the Appropriate Assessment screening , there is sufficient evidence that the site is used in mid-winter by Light-bellied Geese, Curlews, Oyster Catchers, Gulls and Buzzards. Photographs have been submitted of the species using the site for foraging.
- The development would exacerbate noise and light pollution from the development. At present the existing astro-turf pitch is used beyond 10p.m at high impacting upon residential amenity.
- The observer seeks that other areas of concern raised in the original submission are also considered by the Board.

7.4. Further Responses

- None

8.0 Assessment

8.1. The main issues in this appeal are those raised in the grounds of appeal, and I am satisfied that no other substantive issues arise. The issue of appropriate assessment needs to be addressed. The issues can be dealt with under the following headings:

- Principle of Development
- Appropriate Assessment
- Other Issues

8.2. Proposed Development

The existing Howth Celtic Football Club consists of existing sports grounds with playing pitches and an existing Club House. There is existing astro turf playing pitch on site and some low-level flood lighting. The existing clubhouse is to the south east of the site, with a pedestrian access onto Carrickbrack Road. At present there is no car parking capacity on site, with an existing splayed entrance to the south west of the site. Howth Golf Club is to the east of the site. The area is identified as a High Amenity Area in the Fingal Development Plan.

The proposed development consists of the following:

- 8.2.1. The provision of a new 100m x 59m all-weather training pitch to the north of existing grass pitch. This pitch is proposed to be located within the northeastern section of the site. The pitch would be set off the northern boundary by c. 11.9m reducing to c. 7.9m, off the northwestern boundary by ca. 11m, increasing to ca. 39m, off the boundary with Carrickbrack Road by c. 87m and off the southeastern boundary. To facilitate the development, it is necessary to raise the level of part of the Site by c. 0.7m. It is proposed to provide 6 no. 15m high floodlighting columns, proportionately located around the pitch. The Development includes for the provision of pitch perimeter fencing consisting of 2.4m high mesh fence and 6m high ball-catch netting.
- 8.2.2. It is also proposed to widen the existing vehicular entrance onto Carrickbrack Road from c. 8.5m to c. 10.6m. This element would involve provision of new rendered blockwork piers and reconstituted stone capping, c. 2.1m (h) and the provision of galvanised steel swing gates, c. 1.8m (h). The provision of on-site reinforcement grass parking area to be located along the southwestern part of the Site. The total number of car parking proposed is 28.
- 8.2.3. A 10m riparian buffer zone is proposed along the western Site boundary, where an existing drainage channel is located (See Figure 3). This buffer zone will be delineated by a 0.9m high timber post and rail fence, which will also act to protect the

edge of riparian buffer zone and the drainage channel itself. This post and rail fencing will be erected in advance of the construction of the car park or all-weather pitch taking place. The area within the buffer zone will be maintained as it is i.e., as scrub and meadow habitat.

- 8.2.4. The proposal will result in the removal of maintained grassland in places of astro turf development.

8.3. Principle of Development

- 8.3.1. The site is located within the land-use zoning objective HA, “High Amenity” within the Fingal Development Plan 2023 -2029. This zoning objective seeks to Protect and enhance high amenity areas. Section 9.6.17 sets out the features that contribute to identifying sites for High Amenity zoning, including provision of public access to interesting attractive landscapes or to semi -natural areas. Policy GINHP28 – Protection of High Amenity Areas – Protect High Amenity area from inappropriate development and reinforce their character, distinctiveness and sense of place. Objective GINH067 – seeks to ensure that development reflects and reinforces the distinctiveness and sense of place of High Amenity area including the retention of important features or characteristics, taking into account various elements such as geology and landform, habitats and land use. Having regard to the above policies I note, the high amenity status of the site does not preclude the development of astro turf field, floodlighting or car parking.
- 8.3.2. Regarding the site zoning, I note that “open space” is referenced as permitted in Principle. The planning authority considered the provision of additional sports facilities associated with an established use such as Howth Celtic FC as permitted in principle.
- 8.3.3. Having regard to the zoning for the site, I consider the development of additional playing facilities can be considered within the “open space” zoning, therefore I consider that the proposal is permitted in principle by the existing zoning for the site.

8.4. AA Screening

A full Appropriate Assessment Screening is detailed in Appendix 3 of this report. This section of the report will deal exclusively with the Planning Authorities reason for refusal.

- 8.4.1. The primary reason for refusal as cited by Fingal County Council, is that there is reasonable scientific doubt regarding the robustness of the findings in the Appropriate Assessment Screening Report as submitted by the applicant with particular reference to Light-bellied Brent Goose. It has not been adequately demonstrated that likely significant effects on ex-situ factors can be excluded for the Baldoyle Bay SPA, North Bull Island Spa and Malahide Estuary SPA. It was considered that the loss of 1/3 of the site (amenity grassland) would have unacceptable impacts for ex situ feeding sites which would have the potential to affect the species in the long term. The planning authority took the precautionary approach and considered that there was sufficient doubt that the proposed development as presented would have a significant effect on European sites.
- 8.4.2. The applicant as part of their appeal considered that the planning authority did not apply the precautionary principle appropriately. It is argued that the precautionary principle is being applied too broadly in this case and should be used to address a genuine scientific uncertainty that prevents a fully informed risk assessment. The applicant states the evidence provided in the Appropriate Assessment Screening is sufficient to demonstrate that there will be no impact on any European Site.
- 8.4.3. The planning authorities primary concern relates to the potential impact on the Qualifying Interests of Baldoyle Bay SPA, North Bull Island Spa and Malahide Estuary SPA. The planning authority considered that the likelihood of the Light Bellied Brent Geese using the grounds as ex-situ feeding grounds to be probable based on historical surveys carried out on site in 2013, 2014, 2016, 2017 and between 2018 – 2020, where the presence of the geese was evident on site. It was considered the finding of Light-bellied Brent Geese droppings (2024 survey) on site would indicate the continued use of the site for foraging, rather than by passing birds. Its further stated that seven days of surveys over one winter period is insufficient to prove the contrary.

- 8.4.4. The applicant has submitted an Appropriate Assessment Screening Report updated as part of a response to further information. Having regard to the primary concern of the planning authority the report finds the following:

Section 4.1.1 of the report refers to historical records relevant to Light -bellied Brent Geese presence at Howth Celtic FC and surrounding areas. The report acknowledges that lands in the vicinity of the site have the potential to provide ex-situ habitat to SCI bird populations associated with SPA's including Light-bellied Brent Geese. Section 4.3.4.2 in relation to loss of ex-situ habitat, makes reference to a previous Natura Impact Statement compiled by Enviroguide in 2022 which details the numbers and locations of flocks recorded during an extensive Dublin-wide Winter Survey. This survey states that the subject site was surveyed on 29 sperate dates between November 2018 and March 2022 in which Light-bellied Brent Geese were only recorded on one of those dates in January 2022.

The report further concluded that there will be no direct loss or alteration of designated QI habitats within any European Site associated within the proposed development. No direct habitat or species fragmentation related impacts are envisaged as a result of the proposed development. The Winter Bird Surveys conducted on site in 2023/2024 recorded no usage of the site by Light-bellied Brent Geese.

- 8.4.5. The observation on file makes reference to limitations/deficiencies in the Appropriate Assessment screening as provided by the applicant and claims that the Light-bellied geese are actively using the site over the winter period along with other bird species listed within the Annex. Pictures have been provided in relation to same.
- 8.4.6. I consider that there is potential for loss of ex-situ habitat associated with the proposed development. Based on the level of detail supplied within all the bird surveys carried out on site and the findings of droppings associated with Light-bellied Brent Goose on the site in February 2024, I consider there is a likelihood of the site being used as ex-situ habitat by the Light-bellied brent goose. I therefore consider the precautionary approach is appropriate in this instance. I note the applicant's arguments that the Light-bellied Goose has not been identified on site since January 2022. The total number of surveys carried out on site between November 2018 and the present-day over all surveys completed is 36 days. I do not consider that surveys

carried out over 36 days in a six year period (winter period) to be so substantial to conclusively determine that the Light-bellied Brent Goose does not forage on the site. I agree that the presence of droppings on site in February 2024, may indicate a potential larger presence of Light-bellied Geese on site. I therefore consider that there is genuine scientific uncertainty that prevents a fully informed assessment of the site.

- 8.4.7. I consider that the conservation objectives of the European Designated sites affected are clear and unambiguous. In general the conservation objectives seeks to restore and maintain key bird species and their habitats. The proposal involves the removal of a third of the site from natural grassland to providing a synthetic playing pitch and car parking area. In light of the conservation objectives for the European Sites, I consider that the alteration of the site to be significant and would result in the permanent loss of QI habitat directly affecting a QSI- Light-bellied Brent Goose. There is a possibility of significant effects occurring in the absence of mitigation or there is uncertainty as to the significance of effects. Appropriate Assessment is required before permission can be granted.

I therefore consider the proposal as presented would be at variance with Objective GINH027 of the Fingal County Development Plan 2023 – 2029 in that the proposal as presented does not support the maintenance and achievement of favourable conservation status for the habitats and species in Fingal by taking full account of the requirements of the Habitats and Birds Directives. Furthermore it is considered the proposal is at variance with Objective DMS0145 of the Fingal Development Plan 2023-2029 which seeks to ensure sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity

8.4.8. Stage 1 – Screening Determination for Appropriate Assessment

In accordance with section 177U(4) of the Planning and Development Act 2000, as amended (2000 Act), and on the basis of objective information, I conclude that it is not possible to exclude that the proposed development alone will give rise to significant effects on European Site(s) in view of the sites conservation objectives. Appropriate Assessment is required.

This determination is based on:

- Potential permanent loss of ex-situ habitat for SCI species – namely Light-bellied Brent Goose
- Qualifying interests, special conservation interests, and conservation objectives of the European sites.
- The proximity of the site to adjacent European sites.

8.4.9. Having regard to the above I recommend that permission is refused.

8.5. Other Matters

Water Framework Directive

- 8.5.1. The Site of the Proposed Development is within the Liffey and Dublin Bay catchment, and within the Mayne_SC_010 sub catchment (EPA, 2024). The Site is located c. 550m inland from the Dublin Bay coastal waterbody (IE_EA_090_0000), with the closest waterbody being the Howth_09 waterbody (IE_EA_09H230880) or Bloody Stream which runs c.1km to the east of the Site, due north, discharging into the sea at Claremont Strand. The Irish Sea Dublin coastal waterbody (IE_EA_070_0000) is located c. 1.2km to the north of the Site.
- 8.5.2. The WFD ecological status of the Howth_09 watercourse for the 2016-2021 period was classed as 'Moderate'. Regarding waterbody risk, the status of this waterbody is under review (EPA, 2024). The WFD ecological status of Irish Sea Dublin (HA 09) for the 2016-2021 period was classed as 'Good' (EPA, 2024) and this waterbody is not at risk of not meeting its WFD targets.
- 8.5.3. There is no EPA water quality monitoring data for the one monitoring station; HOWTH_09 -Interstitial, Br NW of Howth, located on the Howth_09 waterbody c.1100m to the northeast of the Site.
- 8.5.4. The Site of the Proposed Development is situated on the Dublin (IE_EA_G_008) groundwater body, which has a WFD ecological status of 'Good' for the 2016-2021 survey period, and for which risk status is under review (EPA, 2024). The bedrock aquifer identified beneath the Site is mapped as "Locally important aquifer - Bedrock which is Moderately Productive only in Local Zones" (LI) (GSI, 2024). The level of

vulnerability to groundwater contamination from human activities is considered 'High' at the Site (GSI, 2024).

- 8.5.5. The groundwater rock units underlying the local aquifer are classified as 'Dinantian Pure Unbedded Limestones' (DPUL) (GSI, 2024). The soil beneath and surrounding the Site is mapped as 'Made ground'. There are pockets of 'Bedrock at surface-Calcareous' to the southwest and large areas of 'Bedrock at surface-Non calcareous' to the east dominating the area surrounding the Hill of Howth (EPA, 2024). The quaternary sediments beneath the Site are mapped as predominantly 'Tills derived from Limestones (TLs)', with areas of 'Marine beach sands' (Mbs) to the west of the Site (GSI, 2024).
- 8.5.6. The agent for the applicant within their Appropriate Assessment Screening Report has provided a detailed breakdown of the construction methodology for the site including best practice standard mitigation measures for the control and management of surface and groundwater. The likelihood of impacts as result of the construction of the development can be excluded based on best practices standard construction practices.
- 8.5.7. I have assessed the proposal for the construction of all-weather playing field and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater waterbodies either qualitatively or quantitatively.

The reason for this conclusion is as follows

- small scale and nature of the development, within a confined area.
- Best practice standard construction practices for the control and management of surface water from the site.

8.5.8. Conclusion

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes,

groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

8.5.9. Impact on Residential Amenity

8.5.10. Concerns are raised by the observer on file in relation the potential impact on residential amenity arising from the proximity and scale of the proposed astro turf pitch to nearby residential properties. To ensure a thorough assessment, I have addressed the implications for residential amenity under distinct headings.

8.5.11. Noise Pollution

The appellants have raised concerns regarding the cumulative noise impact that the proposed astro turf pitch and the potential for late night use of the site. The site is currently in use for the purposes of football training and matches. Section 14.20.17 of the Fingal Development Plan states Appropriate Noise Assessments will be required to be carried out in respect of planning applications for residential and other noise sensitive developments within the relevant noise contours presented by the Strategic Noise Maps in the Fingal Noise Action Plan (Dublin Agglomeration Environmental Noise Action Plan 2018–2023) or any other noise contour maps prepared by Fingal County Council. The development site lies outside of these noise maps.

It is acknowledged there is pre-existing noise from the site at certain times of the day. The principle of football club at this location is well established and any additional noise generated by the development would be commensurate with the existing use of the site as a playing pitch. Having regard to hours of use, I consider it appropriate that a condition attach limiting use of the pitches to 10p.m throughout the year an appropriate measure to protect residential amenity. Having regard to established use on site and the possibility of using the area in any case for the purposes associated with the football club, I do not consider it necessary that a site-specific noise measurement assessment be carried out in this instance. I do not consider the issue of noise nuisance to be a substantive issue with which to warrant a refusal reason in this instance.

8.5.12. Light Pollution

- 8.5.13. The observer have expressed concerns regarding the potential adverse effects on residential amenity stemming from the proposed lighting associated with the development. Specifically, they argue that the extent of light spill and its consequent impact on their properties cannot be accurately quantified in the winter period as deciduous trees will lose their leaves in the winter period. This lack of data creates uncertainty about the true extent of the lighting's impact on the residential environment and the potential for disturbance.
- 8.5.14. The applicant has provided a detailed lighting survey conducted by Signify, which offers a thorough assessment of the proposed development's potential impact on neighbouring residential properties. The survey evaluates lux levels across the astro turf pitch and surrounding areas, particularly focusing on potential light spill into adjacent residential zones namely Old Castle Avenue.
- 8.5.15. The proposed lighting scheme includes six 15-meter-high lighting poles strategically positioned around the perimeter of the astro turf pitch. . The survey offers precise coordinates for each pole and includes a detailed analysis of lux levels both on the astro turf pitch and in the immediate vicinity, particularly at the rear of properties in Old Castle Avenue. The report comprehensively details the aiming positions, angles, and alignments of all lighting fixtures, with lux levels calculated for specific locations based on the luminaires employed.
- 8.5.16. The report's findings are further clarified through visual aids, including a False Colour Rendering on page 10, which depicts potential light spill, with blue representing the lowest lux level (0 lux) and yellow the highest (300 lux). The Isoline mapping on page 9 provides a quantifiable representation of light spill in the area surrounding the pitch, ranging from 10 lux to 1 lux.
- 8.5.17. It is important to note that these readings were obtained in the absence of the visors that will be installed on all lighting fixtures, as well as without considering the mitigating effects of existing trees and foliage (Riparian zone), both of which are expected to reduce light spillage.
- 8.5.18. In light of the design approach for the lighting and results of the lighting survey, I am of the view that the anticipated light spill resulting from the proposed development will remain well within acceptable limits for a suburban area, as defined by the

CIBSE guidelines for the reduction of obtrusive light. The lux levels are expected to remain below the 10 lux threshold stipulated in the relevant guidance documents.

8.5.19. In conclusion, I am satisfied that the applicant has adequately addressed the appellants' concerns regarding light spillage. The light spill remains within acceptable parameters and does not result in any significant or detrimental impact on the residential amenity of the surrounding properties.

8.5.20. **Flood Risk**

8.5.21. Observers on file have raised concerns in relation to potential flood risk on site and cite previous flood events in the locality in the past. It is stated that the ground levels on site will be altered to the extent that issues may arise with regard to control and management of surface water on site. Where levels have been altered this may result in localised flood events or waterlogging for the residents of Old Castle Avenue. Based on architectural drawings prepared by CQA (2023) surface water will be directed from the proposed synthetic grass surface via a 1:100 gradient, grading westwards in the direction of the existing drainage channel and proposed 10m riparian buffer zone at the west of the Site. Surface water draining from the proposed new pitch area will also be filtered downwards through the artificial surface to a deep 80mm land drainage pipe which will link to the existing drainage channel located at the western boundary of the Site. Water will be thoroughly filtered prior to entering the existing drainage channel, through a 40mm layer of sand blinding, 65mm layer of stone chipping, 170mm layer of 3inch stone and a geotextile membrane.

8.5.22. I consider the detail provided with regard to surface water management is clear and all surface water can be managed wholly within the grounds of the site.

9.0 **Recommendation**

I recommend planning permission is refused for the following reason:

10.0 **Reasons and Considerations**

1. Having regard to the information provided in the Planning Application and on the basis of the precautionary principle, the Board consider that there is

reasonable scientific doubt regarding the robustness of the findings of the Appropriate Assessment Screening report with particular reference to the Light-Bellied Brent Geese to demonstrate that likely significant effects on ex-situ factors can be excluded for Balldoyle SPA, North Bull Island SPA and Malahide Estuary SPA. The Board is not satisfied that the proposed development individually or in combination with other plans or projects would not adversely affect the integrity of European Sites Balldoyle SPA, North Bull Island SPA and Malahide Estuary SPA in view of the sites conservation objections. The development as proposed would be at variance with Objective DMS0145 of the Fingal Development Plan 2023-2029 which seeks to ensure sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity

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.

Darragh Ryan

Planning Inspector

10th of June 2025

Form 1 - EIA Pre-Screening

Case Reference	322001-25
Proposed Development Summary	Construction of all weather pitch, floodlighting, car parking and widening of existing entrance
Development Address	Howth Celtic Football Club, Carrickbrack Road, Sutton, Dublin 13, D13 X863.
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2. <div style="border: 1px solid black; height: 150px; width: 100%;"></div>
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	Part 2, Class 10 (b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.
<input type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
<input type="checkbox"/> No, the development is not of a Class Specified in Part 2,	

<p>Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994.</p> <p>No Screening required.</p>	
<p><input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold.</p> <p>EIA is Mandatory. No Screening Required</p>	
<p><input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.</p> <p>Preliminary examination required. (Form 2)</p> <p>OR</p> <p>If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</p>	<p>Part 2, Class 10 (b) (iv)</p> <p>Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.</p> <p>1.94ha is the total site area.</p>

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening Determination required (Complete Form 3) <i>[Delete if not relevant]</i>
No <input type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3) <i>[Delete if not relevant]</i>

Inspector: _____ Date: _____

Form 2 - EIA Preliminary Examination

Case Reference	322001-25
Proposed Development Summary	Construction of all weather pitch, floodlighting, car parking and widening of existing entrance
Development Address	Howth Celtic Football Club, Carrickbrack Road, Sutton, Dublin 13, D13 X863.
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	Briefly comment on the key characteristics of the development, having regard to the criteria listed. The proposed development has been designed to logically address the topography on site, resulting in minimal change, with standard measures to address potential impacts on surface water and groundwaters in the locality. Construction activities will require the use of potentially harmful materials, such as fuels and other such substances. Use of such materials would be typical for construction sites. Any impacts would be local and temporary in nature and the implementation of the standard construction practice measures would satisfactorily mitigate potential impacts. Potential impacts on European sites outlined in Appendix 3 of this report.
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	Briefly comment on the location of the development, having regard to the criteria listed The nearest European sites are listed in Section 5.2 of this report. There is potential for loss of ex-situ habitat QIS species associated with adjacent European sites. See appendix 3 for full potential impacts on Protected habitat. The effects are limited to European Sites and can be fully addressed under the Appropriate Assessment methodology.

<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>Construction activities will require the use of potentially harmful materials, such as fuels and other similar substances and give rise to waste for disposal. The use of these materials would be typical for construction sites. Noise and dust emissions during construction are likely. Such construction impacts would be local and temporary in nature, and with the implementation of the standard measures, the project would satisfactorily mitigate the potential impacts. Operational waste would be managed through a waste management plan to obviate potential environmental impacts. Other operational impacts in this regard are not anticipated to be significant.</p> <p>The development will implement SUDS measures to control surface water run-off. The development would not increase risk of flooding to downstream areas with surface water to discharge at greenfield runoff rates.</p>
<p align="center">Conclusion</p>	
<p>Likelihood of Significant Effects</p>	<p>Conclusion in respect of EIA <i>[Delete if not relevant]</i></p>
<p>There is no real likelihood of significant effects on the environment.</p>	<p>EIA is not required.</p> <p>The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.</p>
<p>There is significant and realistic doubt regarding the likelihood of significant effects</p>	

on the environment.	
There is a real likelihood of significant effects on the environment.	

Inspector: _____ Date: _____

DP/ADP: _____ Date: _____

(only where Schedule 7A information or EIAR required)

Appendix 3

Screening for Appropriate Assessment Test for likely significant effects

Step 1: The proposed site is within the grounds of Howth Football Club FC, Carrickbrack Road, Sutton, Dublin 13, D13 X863.

Brief description of project	Construction of an all-weather pitch (in place of existing), erection of floodlighting, 28 car parking spaces, widening of existing access
Brief description of development site characteristics and potential impact mechanisms	<p>The provision of a new 100m x 59m all-weather training pitch to replace the existing grass pitch. This pitch is proposed to be located within the northeastern section of the site. The pitch would be set off the northern boundary by c. 11.9m reducing to c. 7.9m, off the northwestern boundary by ca. 11m, increasing to ca. 39m, off the boundary with Carrickbrack Road by c. 87m and off the southeastern boundary by c. 3m. To enable the Proposed Development, it is necessary to raise the level of part of the Site by c. 0.7m. It is proposed to provide 6 no. 15m high floodlighting columns, proportionately located around the pitch.</p> <p>The Site is located c.500m east of Sutton Strand which lies within the North Bull Island SPA (004006). The North Dublin Bay SAC (000206) also overlaps this part of Dublin Bay. Baldoyle Bay SAC (00199) is located c.1.2km over land to the north of the Proposed Development. A hydrological pathway to these three European sites exists through the potential surface water emissions (north and south of the Site) during the Construction and Operational Phases of the Proposed Development via the existing surface water drainage network. North-west Irish Sea SPA (004236), and Howth Head Coast SPA – located to the north of the site.</p>

The baseline conditions and habitats contained within the Sites redline boundary offer some potential foraging opportunities for species that are designated as SCIs of European designated SPAs within the broader hinterland of the Site. Foraging distances for some species of waterfowl including geese and swan species can be as high as 20km from their

nighttime roosts (SNH, 2016). All SPAs within 20km should be considered for the purpose of determining the likely/potential importance of the Proposed Development Site as a foraging area to these SCI species.

All SCI bird species of the surrounding network of designated sites including wintering lightbellied brent geese, Curlew and Oystercatcher have been taken into consideration during this screening assessment.

The nearby Natura 2000 sites are listed below,

SAC -

- Baldoyle Bay SAC (IE0000199)
- Howth Head SAC (IE0000202)
- North Dublin Bay SAC (IE0000206)
- Rockabill to Dalkey Island SAC (IE00030000)
- Ireland's Eye SAC (IE0002193)
- Malahide Estuary SAC (IE 0000205)
- South Dublin Bay SAC (IE0000210)
- Lambay Island SAC (IE0000204)
- Rogerstown Estuary SAC (IE0000208)

SPA –

- North-West Irish Sea SPA (IE004236)
- Baldoyle Bay SPA (IE0004016)
- North Bull Island SPA (IE0004006)
- Ireland's Eye SPA (IE0004117)
- Howth Head Coast SPA (IE0004113)
- Malahide Estuary SPA (IE0004025)
- South Dublin Bay and River Tolka Estuary SPA (IE0004024)
- Lambay Island SPA (IE0004069)
- Rogerstown Estuary SPA (IE0004015)
- Dalkey Islands SPA (IE004172)

Screening report	<p>Yes – The applicant concludes that on the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and a NIS is not required.</p>
Natura Impact Statement	Y/N
Relevant submissions	<p>A single submission on file raises concerns regarding the bird surveys carried out on site and potential issues with respect to the Appropriate Assessment Screening. The observer contends the development of the site will result in direct habitat loss and negatively impact upon the foraging area for the Light-bellied Brent Geese. The observer states that the Light-bellied Brent Geese forage on the site and have been observed by local residents. Photographs of the birds on site have been provided by the applicant.</p>
<p>The primary concerns of the Planning Authority and applicant are with regard to the potential loss of ex situ habitat (feeding ground for the Light-bellied Brent Geese -listed species). The planning authority consider there is sufficient evidence that demonstrates the site is used as a foraging area for the Light-bellied Brent Geese. The applicant has carried out winter bird surveys on site (2023/24) over 7 dates. The droppings from the Light-bellied Brent Geese were observed on file on February 2024. The agent for the applicant contends these droppings were not so significant in numbers to indicate foraging but possible bird fly overs. The planning authority considers owing to historical bird surveys of the site acknowledging the presence of the protected species, the evidence of bird droppings and the limitation of surveying over seven different dates only, the</p>	

use of the site for foraging by the Light-bellied Brent Geese cannot be excluded, therefore there is reasonable doubt regarding potential impacts on European Sites.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

[List European sites within **zone of influence** of project in Table and **refer** to approach taken in the AA Screening Report as relevant- there is no requirement to include long list of irrelevant sites.

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Baldoyle Bay SPA 004016 (1.6km distant)	Light-bellied Brent Goose [A046] Shelduck [A048] Ringed Plover [A137] Golden Plover [A140] Grey Plover [A141] Bar-tailed Godwit [A157] Wetland and Waterbirds [A999]	1.6km NW from the site	Direct – potential foraging ground for Qualifying Interest Light-bellied Brent Goose	Yes – potential loss of ex-situ habitat Hydrological Pathway to Baldoyle Bay SAC– Surface water discharge to the drainage channel on northwestern edge/boundary of the Site.
North-west Irish Sea SPA 004236	Red-throated Diver (Gavia stellata) [A001] Great Northern Diver (Gavia immer) [A003]	1.2km North	In direct	Tenuous Hydrogeological Pathway deemed insignificant due to distance. Potential ex-situ disturbance for SCI bird species.

	<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>			
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	<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>			
North Bull Island SPA 004006	<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>	0.5km West and South	Indirect potential foraging ground for Qualifying Interest Light-bellied Brent Goose	<p>Yes – potential loss of ex-situ habitat</p> <p>Hydrological Pathway to Baldoyle Bay SAC–</p> <p>Surface water discharge to the drainage channel on northwestern edge/boundary of the Site.</p>
South Dublin Bay and River Tolks Estuary SPA 004024	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p>	5.7km to the South West	Indirect potential foraging ground for Qualifying Interest Light-bellied Brent Goose	Yes – potential loss of ex-situ

	<p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Wetland and Waterbirds [A999]</p>			<p>habitat for Light-bellied Brent Goose</p>
Malahide Estuary SPA	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Pintail (<i>Anas acuta</i>) [A054] Goldeneye (<i>Bucephala clangula</i>) [A067] Red-breasted Merganser (<i>Mergus serrator</i>) [A069] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]</p>	6.8km north west of site	Indirect potential foraging ground for Qualifying Interest Light-bellied Brent Goose	<p>Yes – potential loss of ex-situ habitat for Light-bellied Brent Goose</p>
North Dublin Bay SAC	<p>Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p>	0.5km West and South of site	Indirect	<p>Hydrological Pathway – Surface water discharge to the drainage channel on northwestern edge/boundary of the Site</p>
Balydoyle Bay SAC 000199	<p>Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia</i></p>	1.1km northwest of site	Indirect	<p>Hydrological Pathway – Surface water discharge to the drainage channel on northwestern edge/boundary of the Site.</p>

South Dublin Bay SAC 000210	maritimi) [1410] Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]	5.7km southwest of site	Tentative	Hydrological Pathway – Surface water discharge to the drainage channel on northwestern edge/boundary of the Site.
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Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

[From the AA Screening Report or the Inspector's own assessment if no Screening Report submitted, complete the following table where European sites need further consideration taking the following into account:

- Identify potential direct or indirect impacts (if any) arising from the project alone that could have an effect on the European Site(s) taking into account the size and scale of the proposed development and all relevant stages of the project (See Appendix 9 in Advice note 1A).
- Are there any design or standard practice measures proposed that would reduce the risk of impacts to surface water, wastewater etc. that would be implemented regardless of proximity to a European Site?
- Identify possible significant effects on the European sites in view of the conservation objectives (alone or in combination with other plans and projects)

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: Baldoyle Bay SPA 004016 (1.6km distant)	Indirect: potential loss of foraging ground for Qualifying Interest Light-bellied Brent Goose Negative Impacts 1/3 of site to be transformed from natural grass surface to synthetic playing pitch Negative impacts could be permanent	The proposal would result in permanent habitat loss. Possibility of significant effects cannot be ruled out without further analysis and assessment

	Likelihood of significant effects from proposed development (alone): Yes – potential for habitat loss.	
	Possibility of significant effects (alone) in view of the conservation objectives of the site. <p>The overarching Conservation Objective for Baldoyle Bay Special Protection Area is to ensure that waterbird populations and their wetland habitats are maintained at, or restored to, favourable conservation condition. This includes, as an integral part, the need to avoid deterioration of habitats and significant disturbance; thereby ensuring the persistence of site integrity.</p> <p>Having regard to the historic bird surveys for the site as referenced by the applicant within the AA screening and Fingal Council Ecologist the likelihood the site as been used as ex-situ habitat for the Light-bellied Brent Goose has not been discounted. I consider the alteration of habitat from natural grass to synthetic playing pitch (33% of total area) would result in permanent habitat loss. The possibility of significant effects on Balydoyle SPA cannot be ruled out.</p>	
	Impacts	Effects
Site 2: North Bull Island SPA 004006	<p>Indirect: potential loss of foraging ground for Qualifying Interest Light-bellied Brent Goose</p> <p>Negative Impacts 1/3 of site to be transformed from natural grass surface to synthetic playing pitch</p> <p>Negative impacts could be permanent</p>	<p>The proposal would result in permanent habitat loss. Possibility of significant effects cannot be ruled out without further analysis and assessment</p>
	Likelihood of significant effects from proposed development (alone): Yes	
	Possibility of significant effects (alone) in view of the conservation objectives of the site.	

The overarching Conservation Objective for North Bull Island Special Protection Area is to maintain the favourable conservation condition of the following species and habitat Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] Shelduck (*Tadorna tadorna*) [A048] Teal (*Anas crecca*) [A052] Pintail (*Anas acuta*) [A054] Oystercatcher (*Haematopus ostralegus*) [A130] This includes, as an integral part, the need to avoid deterioration of habitats and significant disturbance; thereby ensuring the persistence of site integrity.

Having regard to the historic bird surveys for the site as referenced by the applicant within the AA screening and Fingal Council Ecologist the likelihood the site as been used as ex-situ habitat for the Light-bellied Brent Goose has not been discounted. I consider the alteration of habitat from natural grass to synthetic playing pitch (33% of total area) would result in permanent habitat loss. The possibility of significant effects on North Bull Island SPA cannot be ruled out.

<p>Site 3: South Dublin Bay and River Tolks Estuary SPA 004024</p>	<p>Indirect: potential loss of foraging ground for Qualifying Interest Light-bellied Brent Goose</p> <p>Negative Impacts 1/3 of site to be transformed from natural grass surface to synthetic playing pitch</p> <p>Negative impacts could be permanent</p>	<p>The proposal would result in permanent habitat loss. Possibility of significant effects cannot be ruled out without further analysis and assessment</p>
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Likelihood of significant effects from proposed development (alone): Yes

Possibility of significant effects (alone) in view of the conservation objectives of the site.

The overarching Conservation Objective for South Dublin Bay and River Tolks Estuary SPA 004024 Protection Area is to maintain the favourable conservation condition of key bird species and their habitats are maintained at, or restored to, favourable conservation condition. This includes, as an integral part, the need to avoid deterioration of habitats and significant disturbance; thereby ensuring the persistence of site integrity.

Having regard to the historic bird surveys for the site as referenced by the applicant within the AA screening and Fingal Council Ecologist the likelihood the site as been used as ex-situ habitat for the Light-bellied Brent Goose has not been discounted. I consider the alteration of habitat from natural grass to synthetic playing pitch (33% of total area) would result in permanent habitat loss. The possibility of significant effects on South Dublin Bay and River Tolks Estuary SPA 004024 cannot be ruled out.

Site 4: Malahide Estuary SPA 004025	Indirect: potential loss of foraging ground for Qualifying Interest Light-bellied Brent Goose Negative Impacts 1/3 of site to be transformed from natural grass surface to synthetic playing pitch Negative impacts could be permanent	The proposal would result in permanent habitat loss. Possibility of significant effects cannot be ruled out without further analysis and assessment
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Likelihood of significant effects from proposed development (alone): Yes

Possibility of significant effects (alone) in view of the conservation objectives of the site.

The overarching Conservation Objective for Malahide Bay Special Protection Area is to maintain the favourable conservation condition of waterbird population species and their wetland habitats are maintained at, or restored to, favourable conservation condition. This includes, as an integral part, the need to avoid deterioration of habitats and significant disturbance; thereby ensuring the persistence of site integrity.

Having regard to the historic bird surveys for the site as referenced by the applicant within the AA screening and Fingal Council Ecologist the likelihood the site as been used as ex-situ habitat for the Light-bellied Brent Goose has not been discounted. I consider the alteration of habitat from natural grass to synthetic playing pitch (33% of total area) would result in permanent habitat loss. The possibility of significant effects on Malahide Estuary SPA 004025 cannot be ruled out.

Based on the above Appropriate Assessment Screening, I consider the likelihood of the site being used as ex-situ habitat for Light-bellied Brent Goose as probable in light of the historic surveys for the site and recent findings of droppings on site. I agree with the precautionary approach taken by the Local Authority and consider further Assessment under Stage 2 Appropriate Assessment is required.

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

It is not possible to exclude the possibility that proposed development alone would result significant effects on [insert European site(s)] from effects associated with loss of es-situ habitat for Waterbird species. (Light-bellied Brent Goose)
An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in-combination with other plans and projects is not required at screening stage.