July 2026

Stage 1: Remedial Appropriate Assessment - Screening and Stage 2: Natura Impact Statement

Retention of Existing Short Term Stay Camping Site

at

Inch, Annascaul, Co. Kerry

On behalf of

Inch Beach House and Cottages

MALONE O'REGAN ENVIRONMENTAL

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Stage 1: Remedial Appropriate Assessment - Screening and Stage 2: Natura Impact Statement

Retention of Existing Short Term Stay Camping Site

Inch Beach House and Cottages

Inch, Annascaul, Co. Kerry

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1 INTRODUCTION

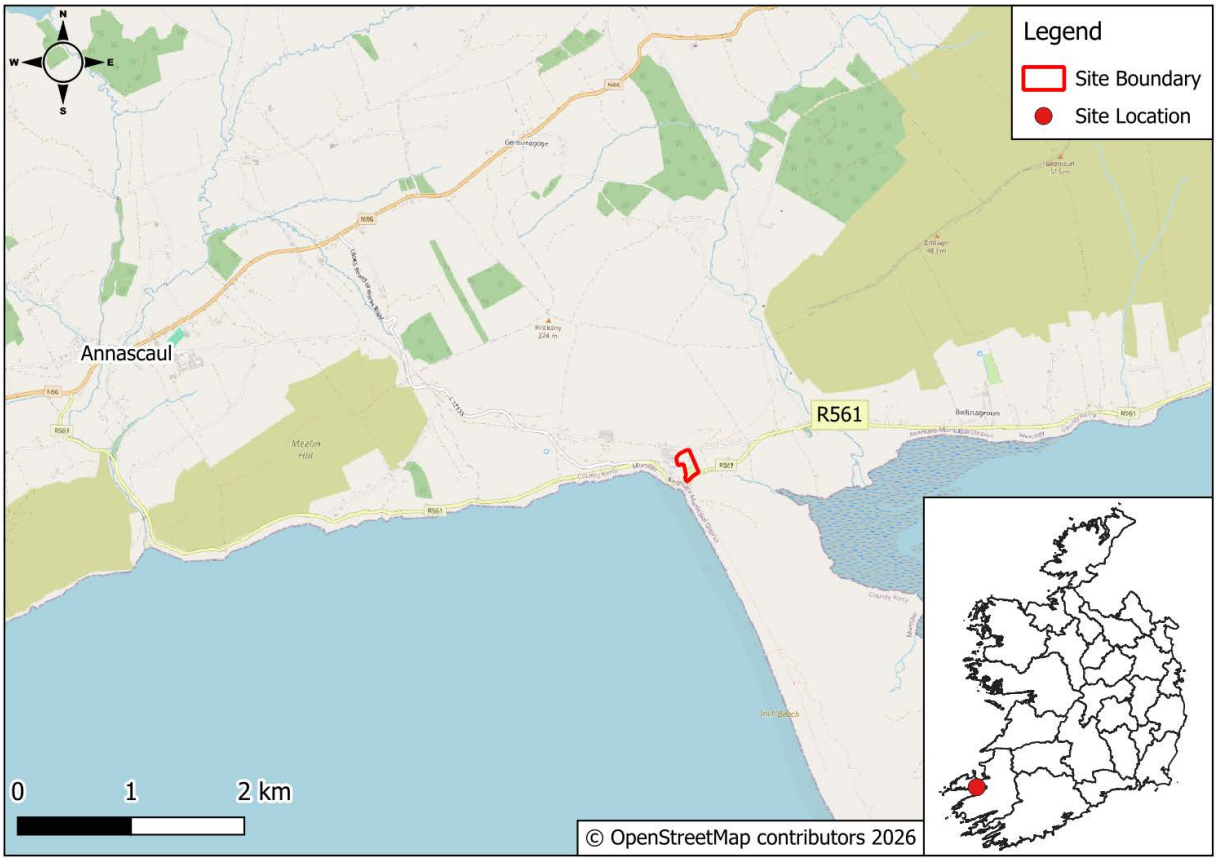
Malone O'Regan Environmental ('MOR Environmental') was commissioned by Inch Beach House and Cottages ('the Applicants') to undertake a remedial Natura Impact Statement ('rNIS') to assess the likely significant effects, if any, of the existing short term stay camping site ('the Development') at Inch Beach, Annascaul, Co. Kerry (ITM OS Reference 464454 600937) on nearby sites with European conservation designations (i.e., Natura 2000 sites).

The Development is located on a site that is circa ('ca.') 2.8 hectares ('ha') in size and is located within the townland of Inch, Co. Kerry. It is shown in Figure 1-1 ('the Site').

The Development requires regularisation through the planning process due to historic on-site activities. This regularisation is achieved through Substitute Consent, which allows developers to apply to An Coimisiún Pleanála ('ACP') seeking permission to regularise developments that are deemed to have required Environmental Impact Assessment ('EIA') or Appropriate Assessment ('AA'), but which were not subject to these assessments due to exceptional circumstances. The provision was introduced under Section 177 of the Planning and Development Act 2000 [1].

This report has been prepared to inform ACP regarding remedial Stage 1 (Screening) and Stage 2 (Appropriate Assessment) of the Development based on research and interpretation of best scientific, geographic and engineering knowledge and in view of the conservation objectives of the surrounding European sites. This report seeks to determine whether the Development, on its own or in-combination with other plans / projects, had a significant effect on European sites within a defined zone of influence of the Site from 1990 to the present day.

Figure 1-1: Site Location



1.1 Background

The Development has been used as a casual short-term camping site since before the 1980s. Development of the Site began between 1990 and 1995, with the construction of a toilet block. Further development of the Site comprised 29 hard-surface pitches, upgrades to the toilet block, a campervan toilet cassette-emptying / cleaning unit, areas for tent pitching and gravel-filled surface water percolation trenches.

The Development has a reduced scope compared to the previously permitted developments and consists of:

- The use of the land as a short-term stay camping site, including all existing ancillary elements comprising:
    - Electrical infrastructure, including electrical fittings and meter boxes;
    - Wooden fencing and entrance barrier;
    - Campervan toilet cassette emptying / cleaning unit; and,
    - All hard and soft landscaping, including existing hardstanding areas comprising campervan/tent pitches and internal gravel roadway.
- The demolition of the previous toilet and shower block and the construction and alteration of the existing toilets and shower facilities, and associated structures to the rear; and,
- Trenching works and associated landscape alterations, undertaken as part of the Archaeological Assessment prepared in respect of Kerry County Council ('KCC') Reg. Ref 21438 (An Coimisiún Pleanála ('ACP') (Ref. 21438)).

A history of the relevant planning applications for this Site has been provided in Table 1-1. A Natura Impact Statement was submitted with the most recent valid planning application: 21438. ACP refused this application on appeal on 19th February 2024. The Inspector's Report issued with the refusal states that a rNIS is required for the substitute consent application for the Development.

Table 1-1: Relevant Planning Applications

Planning Ref	Applicant	Details	Decision Date	Decision
2560116	Mark, George & Zara Hussain	Permission for the following: a) Upgrade and service existing hardstandings for touring pitches; b) To improve existing camping area for tents c) Extend existing toilet block; d) Install new wastewater treatment system; and, e) Install entrance barrier at Inch, Annascaul, Co. Kerry.	N/A	Incomplete Application
2460817	Mark, George & Zara Hussain	Permission for development to construct a two storey camping site reception building which will contain the reception, campsite shop, staff rooms and associated rooms and all ancillary works and permission to decommission the existing septic tank and to install a new wastewater treatment system including a campervan cassette wastewater disposal unit and all ancillary works and Retention Permission to retain	N/A	Incomplete Application

Planning Ref	Applicant	Details	Decision Date	Decision
		an extension to the existing toilet/services block which is a wash-up area		
21438	Mark, George & Zara Hussain	(a) Retain the existing short-term stay camping site within revised site boundaries; (b) Retain the alteration and renovation works to the existing toilets and site as constructed; (c) Planning permission to construct an extension to the existing toilets, including alterations to the existing toilets; (d) Permission to construct a camping site reception building which will contain the reception, campsite shop, staff rooms and associated rooms; (e) Permission to extend the camp site with access to same, including all necessary landscaping and site works (f) Permission to construct a wastewater treatment tank with puraflo modules and polishing filter, including decommissioning the existing septic tank. An NIS was submitted in support of this application.	02/03/2022	Granted with 20 conditions. Appealed on 29th March 2022 via An Comisiún Pleanála (ACP). Refused on appeal by ACP on 19th February 2024.
191026	Mahmood and George Hussain	Retain the renovation and alteration works carried out to the existing building in the caravan and camping site.	N/A	Withdrawn
044164	ZAG Developments	(a) Construct a holiday house development consisting of sixteen houses (twelve semi-detached and four detached; (b) Install a common wastewater treatment unit, control room and percolation area including all necessary filters etc.; (c) Erect new signage; and, (d) Construct and access road, footpaths, parking areas etc including all necessary site works	17/05/2005	Granted with 39 conditions.

1.2 Statement of Authority

This report was reviewed and approved by Mr. Dyfrig Hubble, Associate Director - Ecologist. Dyfrig is a full member of the Chartered Institute of Ecology and Environmental Management ('CIEEM'). Dyfrig has over 19 years' experience working in the ecological consultancy sector, including habitat surveys and appraisals and specialist protected species surveys in support of Appropriate Assessments.

1.3 Guidance and Legislative Context

The following guidance has informed the preparation of this rNIS report:

- Office of the Planning Regulator ('OPR') Practice Note PN01, *Appropriate Assessment for Screening for Development Management*, The Office of the Planning Regulator [2];
- *Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, European Commission [3];
- *Guidelines for Ecological Impact Assessment in the UK and Ireland*, Chartered Institute of Ecology and Environmental Management [4];
- *Managing Natura 2000 Sites:* The Provision of Article 6 of the Habitats Directive 92/43/EEC [5]*;*
- *Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities,* DoEGLH [6]; and,
- *Appropriate Assessment under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10*, DoEGLH [7]*.*

This rNIS was prepared in accordance with and in compliance with the following relevant legislation, including:

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna, better known as "The Habitats Directive". This provides the framework for legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. The Habitats Directive was transposed into Irish law by the Planning and Development Act 2000 (as amended) and the European Communities (Birds and Natural Habitats) Regulations (S.I. 477 / 2011) (as amended) [8].

For completeness, the Planning and Development Act 2000 (as amended) states "European site" means:

- A candidate site of Community Importance ('cSCI');
- A site of Community Importance ('SCI');
- A Special Area of Conservation ('SAC');
- A candidate Special Area of Conservation ('cSAC'); or,
- A Special Protection Area ('SPA').

These are SACs designated under the Habitats Directive and SPAs designated under the Conservation of Wild Birds Directive (79/409/EEC as amended 2009/149/EC) (better known as "The Birds Directive").

Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment.

> *"Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject*

> *to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public"*

The Court of Justice of the European Union ('CJEU') has made a number of rulings on Appropriate Assessment, including when it is required, its purpose and the standards it should meet. Two of the key rulings came from , Case C-127/02 Waddenzee and Case C-258/11 Sweetman, where the CJEU found that

Case C-127 Waddenzee:

> "*Any plan or project not directly connected with or necessary to the management of the site is to be subject to an appropriate assessment of its implications for the site in view of the site's conservation objectives if it cannot be excluded, on the basis of objective information, that it will have a significant effect on that site, either individually or in combination with other plans or projects*" and that the plan or project may only be authorised "*where no reasonable scientific doubt remains as to the absence of such effects", and,*

Case C-258/11 Sweetman:

> *"(The Appropriate Assessment) cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned*".

Consideration has been given in the preparation of this report, to the evolution in interpretation and application of directives and national legislation arising from jurisprudence of the European and Irish courts, in respect of Article 6 of the Habitats Directive.

1.3.1 The Mitigation Hierarchy

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. First, the project should aim to avoid any negative effects on European sites by identifying possible effects early in the planning stage and designing the project in order to avoid such effects. Second, mitigation measures should be applied, if necessary, during the Appropriate Assessment ('AA') process to the point where no adverse effects on the site(s) remain. If the project is still likely to result in adverse effects, and no further practicable mitigation is possible, it is rejected. If no alternative solutions are identified and the project is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effects.

1.4 Stages of Appropriate Assessment

There are four distinct stages to undertaking an AA as outlined in current European Union ('EU') and Department of Environment, Heritage and Local Government ('DoEHLG') guidance:

Stage 1: Screening

The purpose of this screening stage is to determine, in view of best scientific knowledge, whether a plan or project, individually or in-combination with other plans or projects, is likely to have a significant effect on a European site in view of the site's conservation objectives. If likely significant effects are identified which require mitigation the plan or project cannot be screened out and must proceed to Stage 2.

Stage 2: Appropriate Assessment

Where likely significant effects are identified or uncertain, an assessment of the potential mitigation of those effects is required; this stage considers the appropriateness of those mitigation measures in the context of maintaining the integrity of the European sites in light of their conservation objectives. Consideration is then required to determine if potential for adverse effects on European sites cannot be eliminated with appropriate mitigation measures, then the assessment must proceed to Stage 3.

Stage 3: Assessment of Alternatives Solutions

This process examines alternative ways to achieve the objectives of the plan or project that avoid adverse effects on the integrity of the Natura 2000 site if mitigation measures are deemed insufficient.

Stage 4: Imperative Reasons of Overriding Public Interest ('IROPI')

Where no practical alternative exists, this stage examines whether there are Imperative Reasons of Overriding Public Interest ('IROPI') that would mean the plan or project should still proceed despite adverse effects remaining. Projects that fall under IROPI will require an assessment of compensatory measures. If there are no IROPI, or if compensation is not feasible, the project or plan cannot proceed.

2 METHODOLOGY

2.1 Determining Zone of Influence

The starting point for this assessment was to determine the Zone of Influence ('ZoI'). The ZoI comprises the area in which the Development may potentially affect the conservation objectives (or qualifying interests) of a European site.

Previous guidance for 'Appropriate Assessment of Plans and Projects in Ireland' notes that a buffer distance of 15km from the location of the development site being assessed is recommended for the identification of relevant European sites [6]. However, guidance from the OPR and guidance from the National Parks and Wildlife Services ('NPWS') recommend that the distance should be evaluated on a case-by-case basis with reference to the nature, size and location of the project, the sensitivities of the ecological receptors and the potential for in-combination effects (cumulative) [7, 2]. For some projects, the distance could be greater than 15km, and in some cases, less than 100m.

The ZoI must be defined in a manner that is sufficiently precautionary, such that if there is any reasonable scientific doubt as to the potential for significant effects, the area is included for further assessment.

The definition of the ZoI for the proposed works includes evaluating the following:

- Identification of the European sites that are situated within, in close vicinity or downstream within the ZoI of the Proposed Development;
- Identification of the designated habitats and species and conservation objectives for the identified European sites;
- Identification of the environmental conditions that stabilise and increase the qualifying interests of the European sites towards favourable conservation status;
- Identification of the threats / effects, actual or potential, that could negatively affect the conservation objectives for the European sites;
- Identifying the activities of the proposed works that could give rise to significant adverse effects; and,
- Identification of other plans or projects, for which in-combination effects would likely have significant adverse effects.

2.1.1 Source-Pathway-Receptor Model

European sites are only at risk from significant effects where a source-pathway-receptor link exists between a Development and a European site. This can take the form of a direct effect (e.g., where the Development is located within / in close vicinity to the boundary of a European site), or an indirect effect where effects occur outside of the European site but affect ecological receptors within the European site (e.g., effects to water quality which can affect estuarine habitats at a distance from the impact source).

The likely effects of the Development on any European site have been assessed using a source-pathway-receptor model. A source-pathway-receptor model is a standard tool used in environmental assessment and is recommended by OPR Guidance [9], [10]. The model comprises:

- A source: any potential effects from the Proposed Development, e.g., the runoff of sediment / construction pollution;
- A pathway: the means or route by which a source can affect the ecological receptor; and,

- A receptor: the qualifying interests and / or special conservation interests of the European sites.

In order to establish the ZoI of the Development works, the likely key environmental effects / changes associated with the Development were determined, having regard to the project characteristics set out in Section 3.1 of this report. The ZoI for various potential impact pathways are discussed in Section 4.1.

2.2 Desk-Based Review

A desk-based review of information sources was completed, which included the following sources of information:

- Review of aerial maps of the Site and surrounding area;
- The NPWS website was reviewed with regard to the most up-to-date details on conservation objectives for the European sites relevant to this assessment [11];
- The KCC Planning Portal was reviewed to obtain details about existing / proposed developments in the vicinity of the Site [12];
- The Department of Housing, Local Government and Heritage's planning portal – the National Planning Application Database was reviewed to obtain details about existing / proposed developments in the vicinity of the Site [13];
- Goldcrest Environmental Service Ltd. – Final Report of Ornithological Surveys, Inch Co. Kerry - April 2025 to March 2027 (Appendix C). This report was commissioned by the Applicant to evaluate the breeding and wintering bird populations and potential for significant adverse effects on these bird populations;
- BirdWatch Ireland – The Irish Wetland Bird Survey ('I-WeBS') data, which is coordinated by BirdWatch Ireland and under contract to the NPWS, was reviewed with regard to wintering waterbird population within the vicinity of the Site [14];
- The National Biodiversity Data Centre ('NBDC') website was reviewed with regard to species distributions [15]; and,
- The Environmental Protection Agency ('EPA') Maps website was reviewed to obtain details about watercourses in the vicinity of the Site [16].

The desk-based review also included a comprehensive examination of historic aerial imagery as a means of evaluating the expansion of the Site and the habitats that were previously present within the area, using the following sources:

- The Geological Survey Ireland ('GSI') area maps website was consulted for the historic maps [17];
- The GeoHive Hub website was consulted for the examination and comparison of historical aerial imagery [18]; and,
- The Google Earth website was consulted to evaluate the expansion of the Site and the habitats that previously occurred in that area [19].

The information gathered from these resources has been used as baseline data within this report, where appropriate. This information is presented alongside the field survey results (methodology described below) in Section 5.2.1.2.

2.3 Field-Based Studies

2.3.1 Habitat Survey

An initial Site walkover was undertaken on 27th May 2026 by a suitably qualified MOR Environmental Ecologist. This survey aimed to assess the extent and quality of habitats present on the Site and to identify any potential associated with the European sites.

During the initial Site walkover, a habitat survey was undertaken using the Heritage Council's '*Guide to Habitats in Ireland'* [20] and conducted in line with the Heritage Council's '*Best Practice Guidance for Habitat Survey & Mapping'* [21]. This is the standard habitat classification system used in Ireland and includes both a desk-based and field-based assessment.

The assessments were extended to also identify the potential for these habitats to support other features of nature conservation importance, such as species afforded legal protection under either Irish or European legislation.

2.3.2 Otter Survey

The survey aimed to identify and examine areas where otters might occur by noting any evidence of otters observed. Evidence of otter searched for included:

- Holts (features log piles, caves and cavities);
- Slides (flattened areas of mud or vegetation);
- Paw prints;
- Evidence of foraging (usually in the form of feeding remains such as fish scales and shellfish); and,
- Spraints (isolated otter droppings).

The field survey of the Site was conducted in line with the following relevant guidance for otter:

- Scottish Natural Heritage ('SNH'), 'Technical Advice Note #2: Otter Surveys' [22];
- DoAHG, 'National Otter Survey of Ireland 2010 / 12' [23]; and,
- National Roads Authority ('NRA'), now Transport Infrastructure Ireland ('TII'), 'Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes,' [24].

2.3.3 Invasive Species

The Site was visually assessed for the presence of any noxious / invasive species that are regulated under the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374/2024) [25], such as Japanese knotweed (*Reynoutria japonica*) and Himalayan balsam (*Impatiens glandulifera*).

The Site was also assessed for the presence of non-regulated invasive species that have the potential to affect local biodiversity.

2.3.4 Other Species

In addition, as part of the overall ecological assessment for the Site, an assessment was carried out of the Site's potential to support other species considered of value to biodiversity, including those identified as occurring locally in the desktop study. This information was used as part of the rNIS to inform the assessment of potential adverse effects on both Annex I species and habitats identified as part of the study.

2.4 Survey Conditions and Limitations

No survey limitations were encountered.

3 DESCRIPTION OF THE DEVELOPMENT

3.1 Site Context

The Site is located on a ca. 2.8ha site, which is located ca. 5.1m (southeast) of Annascaul, Co. Kerry. The Site is accessed via the R561, a regional road connecting Farranfore to the N86 west of Annascaul, Co. Kerry.

The Site currently comprises agricultural fields, an existing campsite and a block of toilets. The development for which the Applicant is applying for substitute consent consists of:

- The use of the land as a short term stay camping site, including all existing ancillary elements comprising (i) electrical infrastructure including electrical fittings and meter boxes, (ii) wooden fencing and entrance barrier, (iii) campervan toilet cassette emptying / cleaning unit, and (iv) all hard and soft landscaping, including the existing hardstanding areas comprising campervan / tent pitches and internal gravel roadway;
- The demolition of the previous toilet and shower block and the construction and alteration of the existing toilets and shower facilities, and associated structures to the rear; and,
- Trenching works, and associated landscape alterations, undertaken as part of the Archaeological Assessment prepared in respect of KCC Reg. Ref. 21438 (An Coimisiún Pleanála Ref. 21438).

Figure 3-1: Site Context and Overview

3.1.1 Historical Activities

The historical activities at the Site can be categorised by decade timeframes beginning in the 1980's. Aerial imagery is available in Appendix A, and additional OSI imagery was reviewed to support the timeline below [18].

1980's:

The dominant historical use of the Site has been agricultural pasture. This is evident in historical aerial imagery dating back to 1995 (see Appendix A). The Site was used for intermittent camping. This would not have been evident from aerial imagery.

Since the Site's acquisition by the applicant in the 1980's, the Site was formalised as a campsite through the provision of a permanent campsite.

1990's:

The aerial imagery indicated historical use of the land for pasture, with the land divided into two parcels in 1995 and into three parcels between 1996 and 2000 [18]. The southern parcel of the Site continued to be used for camping. No physical development occurred on the Site until this decade, when a toilet block was provided for patrons north of the southwest corner. This toilet block had three toilets, two sinks, two showers and a plant room. This was visible in the 1995 aerial imagery and therefore took place sometime between 1990 and 1995.

2000's:

The division of the Site into four parcels was evident in the 2001 to 2005 imagery [18]. In the 2009 imagery (see Appendix A), animals were visible grazing in the two middle sections of the land, and a campervan was parked in the southern parcel. These findings were confirmed using Google Street View, which showed cattle grazing at low stocking density and two vehicles parked in the southern parcel, one of which was a campervan.

2010's and 2020's:

Minor development of the Site began during this time, with hardstanding areas established around the site entrance between 2012 and 2017. The hardstanding was extended to include pitches for caravans between 2017 and 2019 (see Figure 3-2). This development included an internal gravel road, electrical infrastructure, fencing and hard and soft landscaping. During this period, the toilet block was upgraded with an additional sink, shower, utility area, a campervan toilet cassette-emptying / cleaning unit, and related works. Between 2019 and 2023, a security entrance barrier and a bin storage area, constructed with wooden fencing, were installed at the Site's entrance.

Licensed archaeological trenching occurred in the north parcels (see Figure 3-3) of the Site in December 2020. An archaeological assessment report was prepared and submitted to KCC as part of a planning application (KCC Reg. Ref. 21/438). There was a surface water runoff incident that carried a small amount of sediment to the south parcel of the Site. The sediment was contained within the Site footprint, and gravel-filled percolation trenches for excess surface water were constructed in March 2021. Both the archaeological and percolation trenches are no longer visible on the Site, with the archaeological trenches being reinstated with grass.

Figure 3-2: Google Earth aerial imagery of the Site from 2017 (left) and 2019 (right) illustrating the progression of hardstanding construction at the Site.

Figure 3-3: Google Earth aerial image from 2023 illustrating the hardstanding pitches extension in the south parcel of the Site and archaeological trenching in the northern parcels

3.2 Watercourses within the Vicinity of the Site

The Site is situated within the Owenascaul-Owenalondrig-Groin-Coastal WFD Catchment [Catchment_ID: 22] and the Emlaghmore_SC_010 subcatchment [Subcatchment_ID: 22_4] [16].

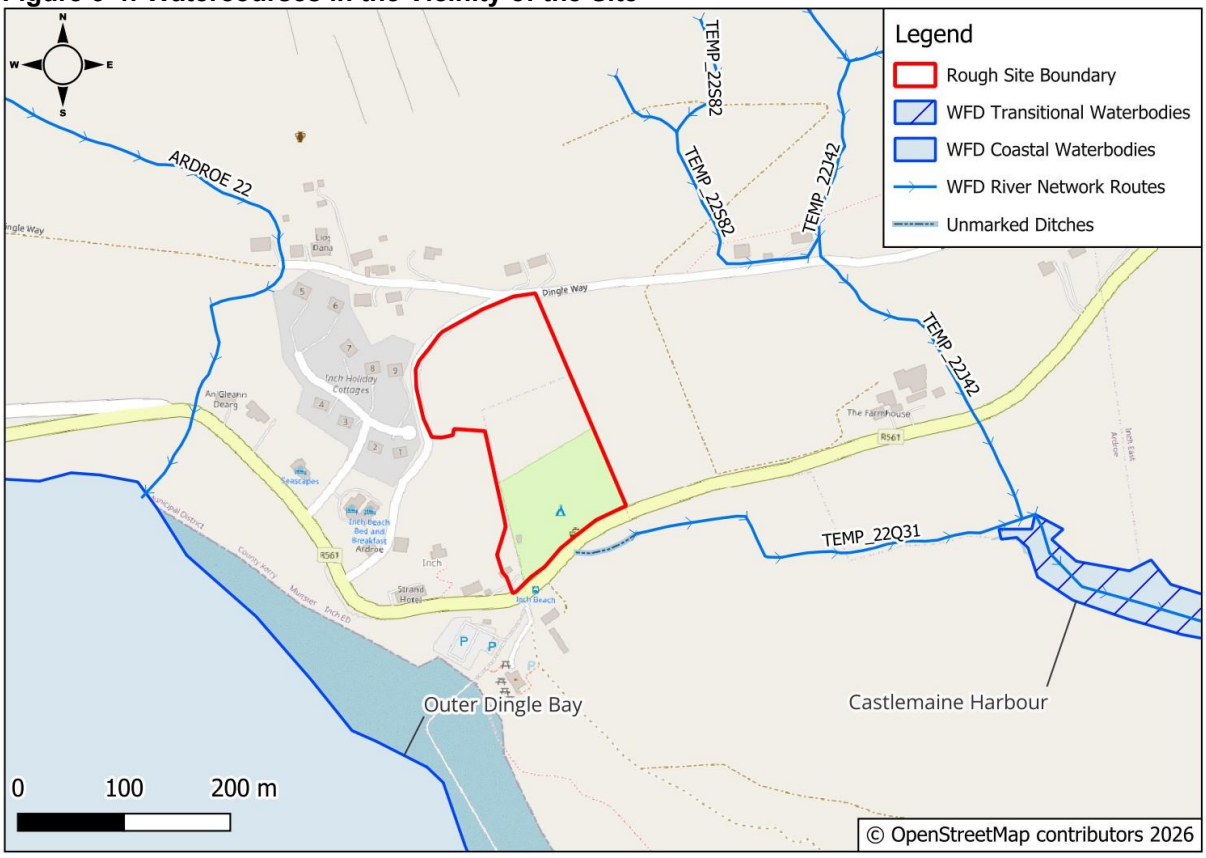
An unnamed stream [EPA_Code: TEMP_22Q31] is located ca. 28m to the southeast of the Site, at its closest point. This stream appeared to be a vegetated ditch with flag iris (*Iris pseudoacorus*), sweet vernal grass (*Anthoxanthum odoratum*), bluegrass (*Poa pratensis*), common rush (*Juncus effusus*) and marsh horsetail (*Equisetum palustre*). The stream's vegetated nature meant there was no noticeable flow. Though in the event of heavy rainfall, the stream is likely to flow east and drain into the Castlemaine Harbour, ca. 789m downstream of the Site. The stream lies within the Castlemaine Harbour SAC and SPA.

Based on the OSI 25 Inch map, there is a spring located (52.1438, -9.9761) ca. 250m east of the Site [18].

Under the Water Framework Directive ('WFD') 2000/60/EC, as amended, the EPA classifies the status and the risk of not achieving good water quality status for all waterbodies in Ireland [16]. According to the WFD 2019-2024 monitoring events, the most up-to-date data at the time of writing this report, the water quality status of the unnamed stream is considered *'Good'* and the Castlemaine Harbour is considered '*moderate'* [16].

The location of the key surface water features in the vicinity of the Site is illustrated in Figure 3-4 below.

Figure 3-4: Watercourses in the Vicinity of the Site



3.2.1 Drainage Ditch Network

The Office of Public Works ('OPW') Flood Maps identify Drainage Districts, Arterial Drainage Schemes and Benefited Areas [26]. Arterial Drainage Schemes were works carried out under the Arterial Drainage Act, 1945, to improve land for agriculture and mitigate flooding. The Benefited Areas identify land that was drained as part of a Drainage District.

During the Site walkover, one drainage ditch was identified across the road from the Site entrance. At the time of the survey, the drainage ditch was heavily vegetated (see species list for unnamed stream above) and appeared to be dry. It should be noted that this drainage ditch was not designated as part of a Drainage District or Arterial Drainage Scheme, and the Site does not form part of any of the benefited areas [26].

3.2.2 Foul Water

The existing septic tanks and soak-away system were installed between 1900 and 1995.

KCC inspected the septic tank on 22nd August 2023 and 1st August 2024. A dye test was conducted, and there were no signs of environmental pollution or public nuisance on those dates.

The system has been maintained in recent years with services provided to de-sludge the tanks and unblock the drains (see Appendix B). The most recent inspection of the system indicates that the septic tanks and associated pipelines are in good working condition (see Appendix D).

3.3 Construction Procedure

The Construction Phase of the Development was inclusive of the following works:

- Installation of electrical infrastructure, including electrical fittings and meter boxes, wooden fencing and entrance barrier, campervan toilet cassette emptying / cleaning unit and all hard and soft landscaping, and internal gravel roadway;
- The demolition of the previous toilet and shower block and the construction and alteration of the existing toilets and shower facilities, and associated structures to the rear; and,
- Trenching works, and associated landscape alterations, undertaken as part of the Archaeological Assessment prepared in respect of KCC Reg. Ref. 21438 (An Coimisiún Pleanála Ref. 21438).

During the Construction Phase of the Development, potential environmental effects would have been short-term and localised. The works were completed in approximately three months. Working hours were to Monday to Friday inclusive from 08:00 to 17:00.

3.4 Operational Procedures

The Operational Phase of the Development is defined as the use of the Site as a campsite, and its timeframe precedes, overlaps, and exceeds that of the Construction Phase. The Construction Phase includes the use of camping areas and facilities (toilets and campervan toilet cassette emptying and cleaning).

4 IDENTIFICATION OF EUROPEAN SITES

In accordance with the European Commission Methodological Guidance [5], a list of European sites that can be potentially affected by the Development has been compiled. Guidance for Planning Authorities prepared by the Department of Environment, Heritage and Local Government [6] states that defining the likely zone of impact for the screening and the approach used will depend on the nature, size, location and the likely significant effects of the project. The key variables determining whether or not a particular European site is likely to be significantly affected by a project are:

- The physical distance from the project to the European site;
- The presence of impact pathways;
- The sensitivities of the ecological receptors; and,
- The potential for in-combination effects.

All SPAs and SACs within 15km have been considered to assess their ecological pathways and functional links. As acknowledged in the OPR guidelines [2], few projects have a zone of influence this large; however, the identification of European sites within 15km has become widely accepted as the starting point for the screening process. For this reason, all SPAs and SACs within 15km have been identified for consideration as part of the screening. In addition, European sites located outside this radius but functionally linked to the Site have also been considered in this assessment.

The Site lies within the Dingle Peninsula SPA [004153]. The closest European sites to the Development are Castlemaine Harbour SAC [000343] and SPA [004153], which lie ca. 9m south of the Site. There are seven other European sites located within 15km of the Site - these are identified in Figure 4-1 and Table 4-1.

Figure 4-1: Site Location and European Sites within 15km

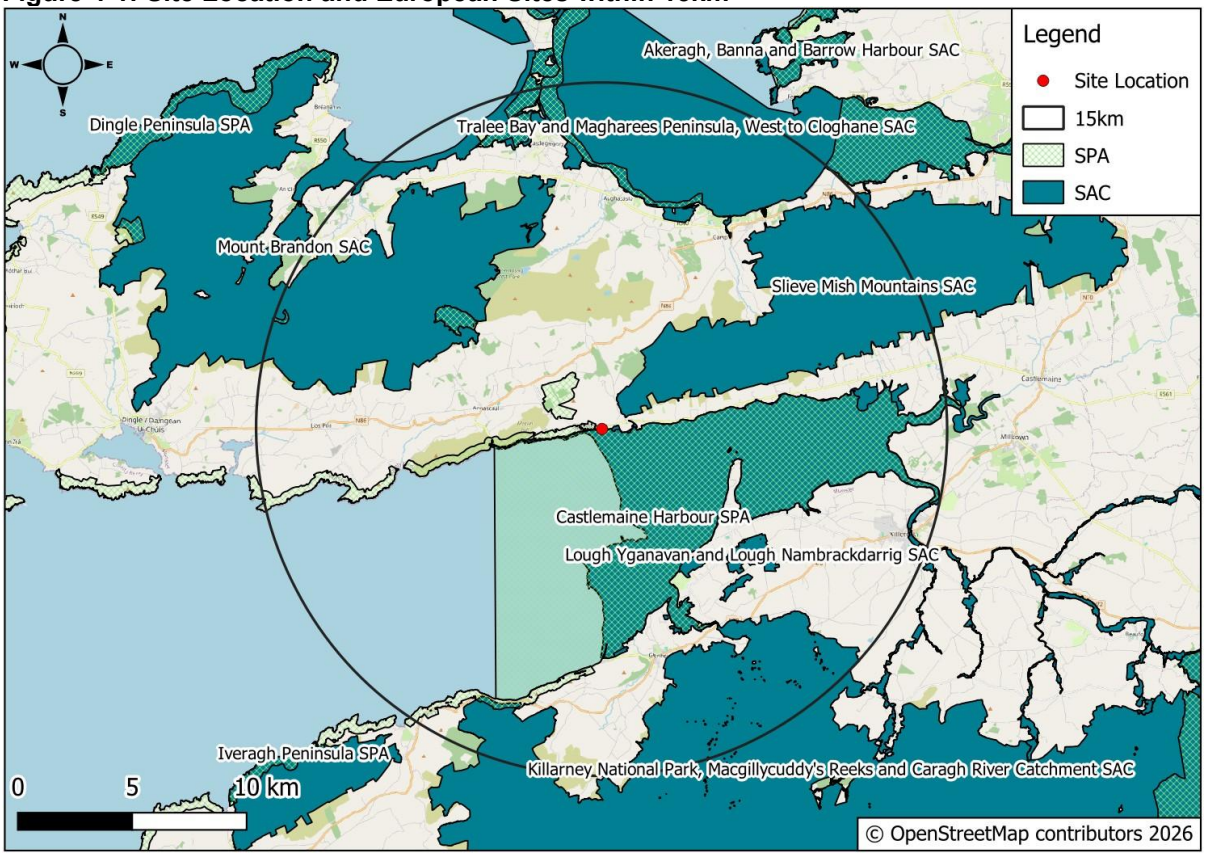


Table 4-1: European Sites within 15km of the Site

Site Name	Code	Distance (km)	Direction from the Site
Special Areas of Conservation ('SAC')			
Castlemaine Harbour SAC	000343	0.03	S
Slieve Mish Mountains SAC	002185	1.1	NE
Mount Brandon SAC	000375	6.6	NW
Lough Yganavan and Lough Nambrackdarrig SAC	000370	7.6	SW
Tralee Bay and Magharees Peninsula, West to Cloghane SAC	002070	9.6	N
Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC	000365	9.8	SE
Special Protection Area ('SPA')			
Dingle Peninsula SPA	004153	0	N/A
Castlemaine Harbour SPA	004029	0.03	S
Tralee Bay Complex SPA	004188	10	NE
Iveragh Peninsula SPA	004154	10.2	S

4.1 Hydrological Connectivity

No watercourses or drainage ditches were identified within the Site. Therefore, there is no direct hydrological connectivity to any European site.

Given the proximity of the Castlemaine Harbour SAC and SPA, there is potential for a weak indirect hydrological connection between the Site and the Castlemaine Harbour SAC and SPA via surface runoff across the road. The drainage ditch in the field across the road (see Section 3.2.1) is connected to the unnamed stream, which discharges downstream into Castlemaine Harbour. However, given the presence of a stone wall, the drainage required for the road, and the highly vegetated nature of the ditch and stream, the likelihood that this pathway was actualised during the Construction or Operational Phase of the Development is considered extremely low.

Additionally, there is potential for hydrological connectivity between the Site and the Castlemaine Harbour SAC and SPA via groundwater. It is assumed that the groundwater flows towards Dingle Bay. The shortest distance between the Site and the sea is ca. 182m, and the septic tanks present at the Site and the sea are ca. 240m apart. Given these distances and the process of natural filtration through sand and gravel, it is unlikely that this pathway was actualised.

4.2 Identification of European Sites within ZoI

The ZoI comprises the area in which the Development may potentially affect the conservation objectives (or qualifying interests) of a European site. The definition of ZoI for the Development evaluated multiple factors as outlined in Section 2.1 and discussed below. Please note that the extent of ZoI varies across environmental aspects, e.g., air, water, etc.

4.2.1 Habitat Loss / Degradation

The Site consists of a semi-improved agricultural field located within the Dingle Peninsula SPA. Given the Site's location within an SPA, the potential for habitat loss and/or degradation warrants further assessment.

Similarly, although indirect and weak, the potential for a hydrological connection between the Castlemaine Harbour SAC and SPA, if actualised, poses a risk to water quality and, as such, to habitat degradation. Refer to the water quality section below for further information.

Given the nature and scale of the Development, the lack of hydrological connectivity and the distances between the Development Site and the following European sites, there is and was no potential for significant effects as a result of direct habitat loss or degradation to the Slieve Mish Mountains SAC, Mount Brandon SAC, Lough Yganavan and Lough Nambrackdarrig SAC, Tralee Bay and Magharees Peninsula, West to Cloghane SAC, Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC, Tralee Bay Complex SPA or Iveragh Peninsula SPA.

4.2.2 Noise / Disturbance

Noise from construction activity has the potential to disturb resting, foraging and commuting qualifying species of the European sites. Individual species will exhibit different behavioural responses to disturbances at varying distances from the source.

- TII (formerly the NRA) has produced a series of best practice planning and construction guidelines for the treatment of certain protected mammal species (i.e. otter), which indicate that disturbance to terrestrial mammals would not extend beyond 150m [27]; and,
- Studies have noted that different types of disturbance stimuli are characterised by different avifaunal reactions; however, in general, 300m can be used to represent the maximum likely disturbance distance for waterfowl [28].

Considering the nature and scale of the Development, particularly the lack of piling required to be completed during the Construction Phase and the existing level of human activity outside the Site, 150m and 300m, were considered disproportionate as ZoIs for noise / disturbance resulting from the Development. Therefore, a 100m buffer was established.

Given that the Site lies within the Dingle Peninsula SPA and within 100m of the Castlemaine Harbour SAC and SPA, there is potential for disturbance of qualifying species of these European sites, and further assessment is required to evaluate the likelihood of significant effects.

4.2.3 Air Quality Impairment

According to the Institute of Air Quality Management ('IAQM') Guidelines, the potential adverse effects from dust arising from construction on ecological receptors occur within 50m of a construction site or 50m of the route used by construction vehicles on the public highway up to 250m from the site entrance [29].

The Site is situated in the Dingle Peninsula SPA and is ca. 3m north of the Castlemaine Harbour SAC and SPA. However, given the temporary nature and small scale of the construction, it is not considered that the Development had any significant effect on the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA due to construction dust.

Therefore, potential air quality impairment associated with construction dust within European sites has been dismissed.

4.2.4 Water Quality Impairment

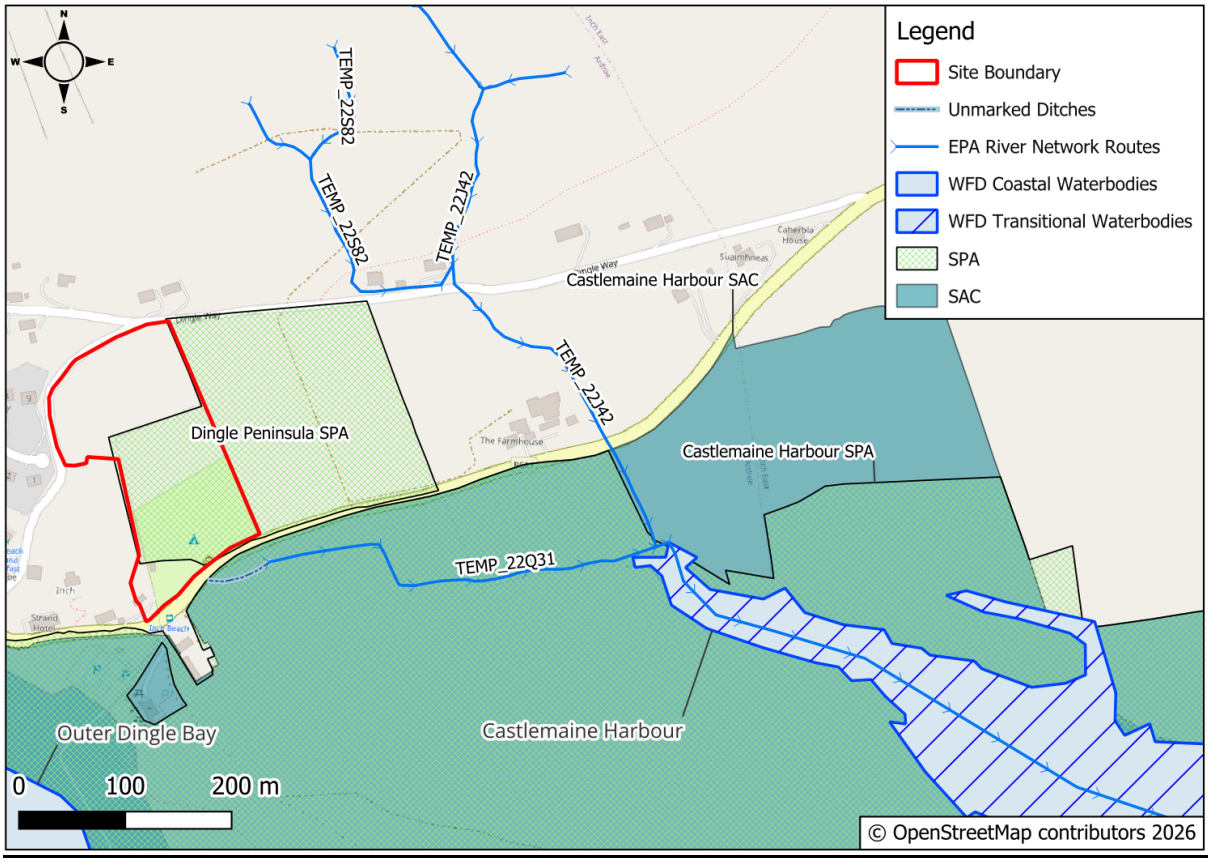
Potential water quality effects would typically be associated with the release of sediment and other pollutants to surface water during the Construction Phase of the Development. Similarly, there was a pathway for pollutants via groundwater during the Operational Phase of the Development that needs to be considered.

The ZoI would be considered to include the potential receiving waterbodies adjacent to and downstream of the Site during the Construction Phase, within 5km, which is the distance used as the starting point for assessing waterbodies based on accepted best practice and professional expertise. Considering the size and nature of the Development, this ZoI is considered reasonable for potential receiving waterbodies

Although hydrological connections between the Site and the nearby Castlemaine Harbour SAC and SPA are possible, the risks to water quality are considered extremely low. This is due to the Development's temporary nature and small scale, and to the weak and indirect nature of these potential hydrological connections.

Nonetheless, further assessment is required to determine the likelihood of significant effects on the water quality of the Castlemaine Harbour SAC and SPA that resulted from the Development.

Figure 4-2: Potential Hydrological Connection between the Site and the Castlemaine Harbour SAC / SPA



4.2.5 Invasive Species

The Development had the potential to introduce medium- or high-impact invasive species to the Dingle Peninsula SPA during both the Construction and Operation Phases, via the tyres of construction and camping vehicles.

If any invasive species were introduced, they would have been evident during the site visit. No medium or high-impact invasive species (including those that are regulated under the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374/2024) [25] were recorded within the Site.

Therefore, the Development has had no effect on the spread of invasive species within the Dingle Peninsula SPA.

4.3 ZoI Conclusions

The Site is located within the Dingle Peninsula SPA and is adjacent to the Castlemaine Harbour SAC and SPA.

Given the short duration of the construction works, distance separating the Site from the Slieve Mish Mountains SAC, Mount Brandon SAC, Lough Yganavan and Lough Nambrackdarrig SAC, Tralee Bay and Magharees Peninsula, West to Cloghane SAC, Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC, Tralee Bay Complex SPA, Iveragh Peninsula SPA, and the intervening lands separating the Site from the European sites and the lack of impact pathways, it is considered that the Development did not result in adverse effects to these European Sites and they have therefore been screened out from further consideration.

The following European sites listed in Table 4-2 have been screened in for further consideration to assess potential adverse effects resulting from the Proposed Development.

Table 4-2: European Sites within ZoI

Site Name	Code	Distance at closest point and source-pathway-receptor link
Dingle Peninsula SPA	004153	The Site is located within the Dingle Peninsula SPA, see Figure 4-2. Given the close proximity of the Site to the SPA, potential habitat loss and/or degradation and disturbance effects to designated species will be taken forward for further consideration.
Castlemaine Harbour SAC	000343	The Site is located within 10m of the Castlemaine Harbour SAC, and there is potential for indirect hydrological impacts via surface water runoff (see Figure 4-2) and groundwater. Therefore, potential disturbance effects on the relevant designated habitats and species will be taken forward for further consideration.
Castlemaine Harbour SPA	004029	The Site is located within 10m north of the Castlemaine Harbour SPA, and there is potential for indirect hydrological, see Figure 4-2). Therefore, potential disturbance effects on the designated species will be taken forward for further consideration.

The screening assessment for individual designated habitats and species for each of the screened in European sites and the potential for them to be adversely affected by the Development are presented in Section 6 below.

Further information on the screened in European sites is provided below.

4.4 Dingle Peninsula SPA (Site Code: 004153)

The Dingle Peninsula SPA is situated on the west coast of Kerry and includes the high coast and sea cliffs, the land adjacent to the cliff edge, areas of sand dunes and several upland areas. It is designated for fulmar (*Fulmarus glacialis*), peregrine (*Falco peregrinus*) and chough (*Pyrrhocorax pyrrhocorax*).

This SPA supports the highest densities of breeding Chough in Ireland, with particularly high densities noted at The Three Sisters and Ballydavid Head. This is attributed to the mosaic of grazed semi-improved and improved pastures, extensive well-drained uplands, and sand dune systems near the breeding cliffs. Other breeding sites are found on the Magharees Peninsula and some inland locations (e.g. the cliffs at Anscaul Lough, Arraglen and Lough Doon). The population of Chough within the SPA is internationally important.

The populations of peregrine and fulmar are of national importance, with five and 1016 pairs recorded in 2002, respectively.

Table 4-3: Qualifying Annex I Birds for the Dingle Peninsula SPA

Common Name	Scientific Name	Code	Site Specific Conservation Objective
Fulmar	*Fulmarus glacialis*	A009	To restore the Favourable conservation condition.
Peregrine	*Falco peregrinus*	A103	To maintain the Favourable conservation condition.
Chough	*Pyrrhocorax pyrrhocorax*	A346	To restore the Favourable conservation condition.

4.5 Castlemaine Harbour SAC (Site Code: 000343)

The site is in the southeast corner of the Dingle Peninsula and is designated for 14 habitats, of which two are priority habitats, and five species. It includes the inner section of Dingle Bay, known as Castlemaine Harbour, the spits of Inch and White Strand/Rosebehy, a small section of coast to the west, as well as areas of the River Maine and River Laune catchment.

Fixed dunes [2130] and alluvial forests [91E0] are priority habitats found within the SAC. The fixed dune systems can be found at Inch spit and are recognised as the finest in the country, with well-developed dune slacks and the presence of the rare bryophyte: petalwort (*Petalophyllum ralfsii*). The alluvial woodland is in the valley upstream of Killorglin and is one of Ireland's few examples of an alluvial forest that is dominated by native species. Alder (*Alnus glutinosa*) and willows (*Salix* spp.) are the dominant species in this small woodland, with ash (*Fraxinus excelsior*) listed as another tree species.

The stretches of river and stream within the River Main and River Laune catchments provide excellent habitat for salmon, lamprey spp. and otter.

There are five Irish Red Data Book botanical species recorded at this site, including sea-kale (*Crambe maritima*), corn cockle (*Agrostemma githago*), sea pea (*Lathyrus japonicus subsp. maritimus*), pennyroyal (*Mentha pulegium*) and lady's-tresses (*Spiranthes romanzoffiana*). Other notable species include Yellow Bartsia (*Parentucellia viscosa*), Laxflowered Sea-lavender (*Limonium humile*) and Blue-eyed-grass (*Sisyrinchium bermudiana*). Additionally, the rare bryophyte petalwort, a qualifying interest of the SAC, is found within the humid dune slack habitats.

The site supports internationally important waterfowl populations. The Irish Red Data Book and Annex IV amphibian species, the natterjack toad (*Epidalea clamita*), is also found within the site.

Table 4-4: Qualifying Annex I Habitats for the Castlemaine Harbour SAC

Qualifying Habitats (*denotes Priority Habitat)	Code	Site Specific Conservation Objective
Estuaries	1130	To maintain the favourable conservation condition.
Mudflats and sandflats not covered by seawater at low tide	1140	To maintain the favourable conservation condition.
Annual vegetation of drift lines	1210	To maintain the favourable conservation condition.
Perennial vegetation of stony banks	1220	To maintain the favourable conservation condition.
Vegetated sea cliffs of the Atlantic and Baltic coasts	1230	N/A
Salicornia and other annuals colonising mud and sand	1310	To maintain the favourable conservation condition.
Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	1330	To maintain the favourable conservation condition.

Qualifying Habitats (*denotes Priority Habitat)	Code	Site Specific Conservation Objective
Mediterranean salt meadows (*Juncetalia maritimi*)	1410	To maintain the favourable conservation condition.
Embryonic shifting dunes	2110	To maintain the favourable conservation condition.
Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	2120	To maintain the favourable conservation condition.
Fixed coastal dunes with herbaceous vegetation (grey dunes)*	2130	To restore the favourable conservation condition.
Dunes with Salix repens ssp. argentea (*Salicion arenariae*)	2170	To maintain the favourable conservation condition.
Humid dune slacks	2190	To maintain the favourable conservation condition.
Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*)*	91E0	To restore the favourable conservation condition.

Table 4-5: Qualifying Annex II Species for the Castlemaine Harbour SAC

Scientific Name	Common Name	Code	Site Specific Conservation Objective
Petromyzon marinus	Sea Lamprey	1095	To maintain the favourable conservation condition.
Lampetra fluviatilis	River Lamprey	1099	To maintain the favourable conservation condition.
Salmo salar	Salmon	1106	To maintain the favourable conservation condition.
Lutra lutra	Otter	1355	To restore the favourable conservation condition.
Petalophyllum ralfsii	Petalwort	1395	To maintain the favourable conservation condition.

4.6 Castlemaine Harbour SPA (Site Code: 004029)

The Castlemaine Harbour SPA encompasses the innermost part of Dingle Bay, including shallow marine water, the sand spits at Rosbehy and Inch and the lower tidal reaches of the River Maine and River Laune. It is designated for 16 bird species and the wetlands that support them.

This SPA is one of the most important sites for wintering waterfowl in the southwest. It is of international importance for light-bellied Brent goose and nationally important for all other bird species it is designated for. This includes three species listed on Annex I of the E.U. Birds Directive: red-throated Diver, bar-tailed godwit and chough. Other Annex I species occurring regularly within the SPA are great northern diver and golden plover.

The subtidal, intertidal and supratidal habitats, including the sand dune systems, within the SPA provide valuable foraging and socialising habitat to the bird species for which the SPA is designated.

Table 4-6: Qualifying Annex II Species for the Castlemaine Harbour SPA

Common Name	Scientific Name	Code	Site Specific Conservation Objective
Red-throated Diver	*Gavia stellata*	A001	To maintain the favourable conservation condition.

Common Name	Scientific Name	Code	Site Specific Conservation Objective
Cormorant	*Phalacrocorax carbo*	A017	To maintain the favourable conservation condition.
Light-bellied Brent Goose	*Branta bernicla hrota*	A046	To maintain the favourable conservation condition.
Mallard	*Anas platyrhynchos*	A053	To maintain the favourable conservation condition.
Pintail	*Anas acuta*	A054	To maintain the favourable conservation condition.
Scaup	*Aythya marila*	A062	To maintain the favourable conservation condition.
Common Scoter	*Melanitta nigra*	A065	To maintain the favourable conservation condition.
Oystercatcher	*Haematopus ostralegus*	A130	To maintain the favourable conservation condition.
Ringed Plover	*Charadrius hiaticula*	A137	To maintain the favourable conservation condition.
Sanderling	*Calidris alba*	A144	To maintain the favourable conservation condition.
Bar-tailed Godwit	*Limosa lapponica*	A157	To maintain the favourable conservation condition.
Redshank	*Tringa totanus*	A162	To maintain the favourable conservation condition.
Greenshank	*Tringa nebularia*	A164	To maintain the favourable conservation condition.
Turnstone	*Arenaria interpres*	A169	To maintain the favourable conservation condition.
Chough	*Pyrrhocorax pyrrhocorax*	A346	To maintain the favourable conservation condition.
Wigeon	*Mareca penelope*	A855	To maintain the favourable conservation condition.
Wetland and Waterbirds	N/A	A999	To maintain the favourable conservation condition of the wetland habitat in Castlemaine Harbour SPA as a resource for the regularly occurring migratory waterbirds that utilise it.

4.7 Conservation Objectives

European and national legislation places a collective obligation on Ireland and its citizens to maintain a favourable conservation status at areas designated as candidate Special Areas of Conservation. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites.

According to the Habitats Directive, favourable conservation status of a habitat is achieved when:

- Its natural range, and area it covers within that range, is stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,
- The conservation status of its typical species is favourable as defined below.

The favourable conservation status of a species is achieved when:

- Population data on the species concerned indicate that it is maintaining itself;
- The natural range of the species is neither being reduced nor likely to be reduced for the foreseeable future; and,
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Conservation objectives for all identified Natura 2000 SAC Sites are as follows:

> *'To maintain or restore the favourable conservation condition of the Annex I habitat(s) and the Annex II species for which the SAC has been selected.'*

Conservation objectives for all identified Natura 2000 SPA Sites are as follows:

> *'To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.'*

Where site-specific conservation objectives are not defined, the above objectives apply. The full reports for the conservation objectives for the Dingle Peninsula SAC[1] and Castlemaine Harbour SAC[2] and SPA[3] and can be found on the NPWS website [30].

[1] Dingle Peninsula SPA: https://www.npws.ie/protected-sites/spa/004153.
[2] Castlemaine Harbour SAC: https://www.npws.ie/protected-sites/sac/000343.
[3] Castlemaine Harbour SPA: https://www.npws.ie/protected-sites/spa/004029.

5 STUDY RESULTS

5.1 Desk-Based Study Results

5.1.1 NBDC Records

Tables 5-1Table 5-1, 5-2 and 5-3 provide a summary of records of legally protected or otherwise notable species protected under the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA, respectively, that occur within 2km of the Site at the time of writing this report [15]. The NBDC records were checked on 3rd July 2026 using a custom polygon of 2km [15].

Records of all designated species of the Dingle Peninsula SPA, one of the designated species for the Castlemaine Harbour SAC, and 15 of the Castlemaine Harbour SPA were found.

Table 5-1: NBDC Records for Species Designated for the Dingle Peninsula SPA within 2km of the Site

Common Name	Scientific Name	Date of Last Record	Designation
Chough	*Pyrrhocorax pyrrhocorax*	03/11/2024	Wildlife Act as amended EU Birds Directive Annex I Bird Species
Fulmar	*Fulmarus glacialis*	24/07/2024	Wildlife Act as amended
Peregrine	*Falco peregrinus*	27/08/2016	Wildlife Act as amended EU Birds Directive Annex I Bird Species

Table 5-2: NBDC Records for Species Designated for the Castlemaine Harbour SAC within 2km of the Site

Common Name	Scientific Name	Date of Last Record	Designation
Otter	*Lutra lutra*	09/04/2015	Wildlife Act as amended EU Habitats Directive Annex II and IV

Table 5-3: NBDC Records for Species Designated for the Castlemaine Harbour SPA within 2km of the Site

Common Name	Scientific Name	Date of Last Record	Designation
Bar-tailed Godwit	*Limosa lapponica*	12/09/2022	Wildlife Act as amended EU Birds Directive Annex I Bird Species
Chough	*Pyrrhocorax pyrrhocorax*	03/11/2024	Wildlife Act as amended EU Birds Directive Annex I Bird Species
Cormorant	*Phalacrocorax carbo*	29/12/2024	Wildlife Act as amended
Common Scoter	*Melanitta nigra*	30/12/2024	Wildlife Act as amended EU Birds Directive Annex II (Section II Bird Species) and Annex III (Section III Bird Species)
Greenshank	*Tringa nebularia*	12/09/2022	
Ringed Plover	*Charadrius hiaticula*	14/09/2024	Wildlife Act as amended
Mallard	*Anas platyrhynchos*	29/08/2023	Wildlife Act as amended EU Birds Directive Annex II, (Section I Bird Species) and Annex III (Section I Bird Species)

Common Name	Scientific Name	Date of Last Record	Designation
Oystercatcher	*Haematopus ostralegus*	30/12/2024	Wildlife Act as amended
Redshank	*Tringa totanus*	29/08/2023	Wildlife Act as amended
Red-throated Diver	*Gavia stellata*	07/09/2024	Wildlife Act as amended EU Birds Directive Annex I Bird Species
Pintail	*Anas acuta*	12/09/2022	Wildlife Act as amended EU Birds Directive Annex II, (Section I Bird Species) and Annex III (Section II Bird Species)
Sanderling	*Calidris alba*	26/09/2024	
Wigeon	*Mareca penelope*	12/09/2022	Wildlife Act as amended EU Birds Directive Annex II, (Section I Bird Species) and Annex III (Section II Bird Species)
Turnstone	*Arenaria interpres*	03/09/2021	Wildlife Act as amended
Light-bellied Brent Goose	*Branta bernicla hrota*	31/12/2011	Wildlife Act as amended

Table 5-4 provides a summary of records of invasive species regulated under S.I. 374 (2024) [8]. Three species were found and confirmed as located outside the Site.

Table 5-4: NBDC Records of Invasive Species Regulated under S.I. 374 (2024) [8]

Common Name	Scientific Name	Date of Last Record
Common Cord-grass	*Spartina anglica*	27/07/1972
Japanese Knotweed	*Fallopia japonica*	02/07/2021
Three-cornered Garlic	*Allium triquetrum*	24/03/2019

The conclusion of this report was that the Site was of low importance to foraging birds, with numbers considered low for a coastal side adjacent to a wetland. Overflying target species were considered to be commuting between other feeding, nesting, or loitering habitats.

5.1.2 I-WeBS Records

The Site does not lie within any I-WeBS site. The cloest sites to the Development are: the Castlemaine Harbour & Rossbehy [0K401] and the Castlemaine Outer: Inch offshore [0K903] I-WeBS sites. The site peak counts were analysed to assess the populations of qualifying interest birds of the Castlemaine Harbour SPA that may utilise the areas in the vicinity of the Site.

The I-WeBS data for both sites were publicly available for the wintering seasons between the years 2013/14 and 2022/23. A total of 57 species were recorded during this period, of which 15 are qualifying species of the Castlemaine Harbour SPA.

Of the species recorded, a total of 11 species were recorded at numbers of national importance, and one species was recorded at numbers of international importance; see Table 5-5 below.

Table 5-5: Wintering Bird Species recorded at numbers of National Importance (N) and International Importance (I) in the Castlemaine Harbour & Rossbehy and the Castlemaine Outer: Inch offshore I-WeBS sites from 2013/14 to 2022/23 Winter Seasons

Site	Species	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Castlemaine Harbour & Rossbehy	Wigeon	N	N		N	N	N	N	N	N	N
	Light-bellied Brent Goose	I	I	I	I	I	I	I	I	I	I
	Redshank	N	N	N	N	N			N	N	N
	Oystercatcher				N					N	N
	Common Scoter					N	N				
	Sanderling	N	N		N	N				N	N
	Bar-tailed Godwit	N	N	N	N					N	
	Mallard	N		N						N	N
	Ringed Plover		N						N		
	Greenshank		N	N	N	N	N		N		N
	Pintail	N	N	N	N	N	N	N	N	N	N
	Red-throated Diver										
	Cormorant										
	Scaup										
	Turnstone										
Castlemaine Outer: Inch Offshore	Sanderling				N		N		N		
	Cormorant									N	
	Common Scoter						N				
	Oystercatcher										
	Ringed Plover										

5.1.3 Ornithological Report

Ornithological surveys were carried out between March 2025 and April 2026 by Goldcrest Environmental Services Ltd. Target species included all raptors, wildfowl, waterbirds, waders, gulls, herons, and Chough. These species were grouped by their activity: feeding on the ground (recorded as 'Terrestrial') or overflying (recorded as 'Overflying'). Overflying species were further grouped as flying below or above 5m. The

163 individuals of eleven target species. The majority of target species identified during the surveys were recorded as Overflying. Terrestrial records we recorded in April, September, December 2025 and January 2026. Most species were recorded in December 2026.

No species relevant to the Dingle Peninsula SPA were recorded within the survey area. The only relevant species to the Castlemine Harbour SPA recorded within the survey area was the oystercatcher (21), with ten terrestrial sightings and 11 overflying sightings. The terrestrial sightings were recorded in the east field adjacent to the Site in April 2025 (2) and December 2025 (10). It was noted that several choughs were recorded outside the survey area throughout the survey period, but not within it.

5.2 Field-Based Study Results

5.2.1 Habitat Assessment

The habitat assessment has been divided into two sections to cover the historical and existing habitats at the Site. The assessment of the existing habitat is detailed first, as this may, in combination with historical aerial imagery, inform the assessment of the historical habitats on the Site.

5.2.1.1 Historical Habitat Assessment

The Site Context (Section 3.1) provides a timeline of the Site's development from 1980 to the present day. This can be used in tandem with the existing habitats at the Site (Section 5.2.1.2) to provide an estimate of the historical habitats at the Site.

Given the aerial imagery and the historical activities at this Site, agricultural pasture has been the dominant use, with its intensity decreasing. This is evident from the available aerial imagery, which shows low stocking densities over decades of use, with vegetation such as common rush and bracken fern (*Pteridium aquilinum*) in the northern parcels becoming more prevalent in the lead up to the Site's current state (see Figure 3-2).

The southern end of the Site has historically been used for camping and continues to be used for this purpose. It has transitioned from semi-natural grassland to amenity grassland (GA2) with areas of hardstanding (BL1).

5.2.1.2 Existing Habitat Assessment

The following section provides details of the field-based assessment that was undertaken for the Site on 27th May 2026. A description of the habitats and features of ecological significance is outlined below and illustrated in Figure 5-1.

Stone Walls and Other Stonework (BL1)

The northwestern and southern boundaries of the Site were recorded as stone walls. There were gaps in the northwestern boundary where the wall had degraded. As it continued northward, it was periodically visible as it was heavily vegetated with bramble.

Other stonework included the remnants of a building at the southwest corner of the Site, a wall north of the toilet building, and a wall containing a small seating area and a food truck, situated southwest of the Site, parallel to the southern boundary wall. The wall around the seating area is lightly covered with ivy (*Hedera* sp.).

Earth Banks (BL2)

This habitat was recorded on the northern boundary of the Site and immediately north of the second row of hardstanding pitches and the toilet block. The bank at the northern boundary had a similar flora to that of the wet grassland (see GS4 description below), but was dominated by common nettle (*Urtica dioica*). The bank north of the toilet block was nearly bare at the most western end and became more vegetated in the eastern direction with dandelion (*Taraxacum vulgaria*), broad-leaved dock (*Rumex obtusifolius*), orchard grass (*Dactylis glomerata*), bramble (*Rubus* sp.), common rush, red clover (*Trifolium pratense*) and common ragwort (*Jacobaea vulgaris*). There were isolated instances of foxglove (*Digitalis purpurea*) and gorse (*Ulex europaeus*).

Buildings and Artificial Surfaces (BL3)

Artificial surfaces included the hardstanding pitches, the seating area around the toilet block, and the bin area situated immediately east of the entrance. There was one building, the toilet block, and two shipping containers on the Site. The toilet block was located at the west end of

the second row of hardstanding pitches. No bat potential or nesting birds were recorded within the toilet block.

Exposed Sand, Gravel or Till (ED1)

The Site had a gravel-filled trench where electrical infrastructure had been installed to the northeast of the toilet block.

Spoil and Bare Ground (ED2)

This habitat was recorded north of the hardstanding pitches as gravel tracks and in small patches in the east of the northern field. Within the northern field, this habitat took the form of excavated pits ca. 1m in depth. The two to the east were bare ground, and the three to the west were vegetated with nettles and common rush. One of the vegetated pits contained brambles and waste material.

Recolonising Bare Ground (ED3)

Bare ground with gravel on it was found immediately north of the toilet block and along a path between the toilet block and the south row of hardstanding pitches. Recolonisation was occurring with sycamore saplings (*Acer pseudoplatanus*), ribwort plantain (*Plantago lanceolata*) , willowherb (*Epilobium* sp.), dandelion, common ragwort, herb-robert (*Geranium robertianum*), prickly sowthirstle (*Sonchus asper*), bramble, orchard grass, sweet vernal grass and bracken fern.

Amenity Grassland (GA2)

Amenity grassland was found between the hardstanding pitches, to the southeast of the toilet block and north of the section row of hard-standing pitches before the grassland became wet and unmown (see GS4 below). The list of species recorded for this habitat was short due to recently mowing of these areas. It included white clover (*Trifolium repens*), foxtail grass (*Alopercurus* sp.) and common daisy (*Bellis perennis*). An isolated hardy fuchsia (Fuchsia sp.) shrub was located opposite the entrance to the toilet block.

Dry Meadow and Grassy Verges (GS2)

Grassy verges were present on either side of the internal road to the south of the toilet block. Species recorded include silverweed (*Potentilla anserina*), ribwort plantain, herb-robert, creeping buttercup (*Ranunculus repens*), broad-leaved dock, orchard grass, white clover, daisy, grasslike starwort (*Stellaria graminea*) and common nettle.

Wet Grassland (GS4)

This habitat is the dominant habitat found within the red line boundary. It was recorded north of the active camping site area and in the northern field. South of the wire and post fence, this habitat was scattered with clumps of common rush, broad-leaved dock, sorrel (*Rumex* sp.), greater birds-foot trefoil (*Lotus pendunculatus*), red clover, meadow buttercup (*Ranunculus acris*), common bird's-foot trefoil (*Lotus corniculatus*), and mouse-ear chickweed (*Cerastium fontanum*).

The species composition in the north field was similar to the area south of the fence, with the exception of an area of nettles in the northeast corner, a patch of brambles surrounded by clumps of flag iris to the west and a patch of creeping thistle (*Cirsium arvense*) in the southwest corner of the field.

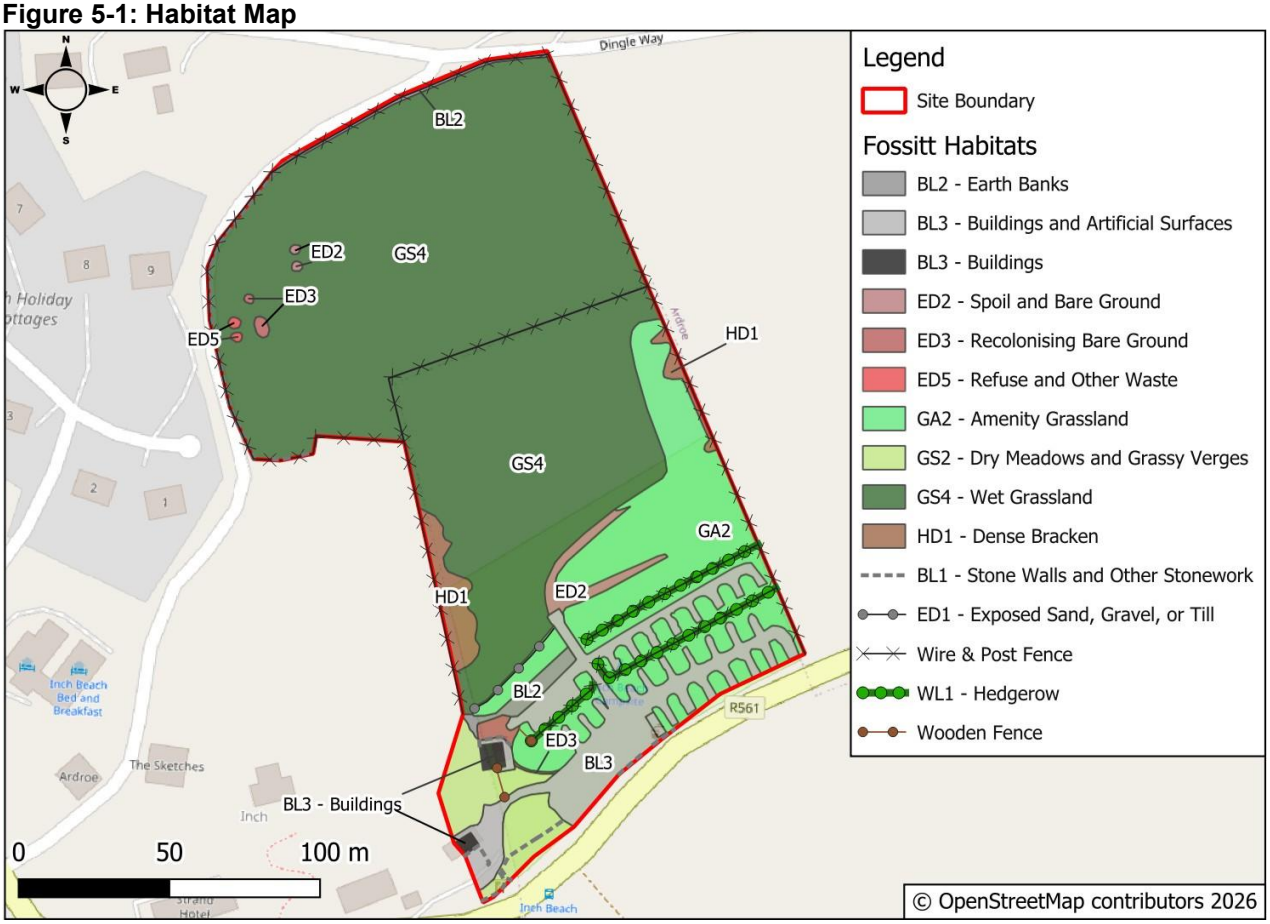
Dense Bracken (HD1)

Dense bracken habitat was recorded on the east and west boundaries of the Site.

Hedgerows (WL1)

Several hedgerows were recorded within the Site. These were ornamental hedges of thorny olive (*Elaeagnus pungens*), planted as a screen between the rows of hardstanding pitches. The southern boundary is vegetated to the east of the Site entrance with hardy fuchsia.

Figure 5-1: Habitat Map



5.2.2 Species

5.2.2.1 Otter Survey

The NBDC held records for otter within 2km of the Site [15]. However, the survey did not identify any evidence of otters on-site, nor did the survey identify any suitable habitat for holt construction.

5.2.2.2 Invasive Species

No invasive species were noted during the Site walkover.

6 STAGE 1 SCREENING: IDENTIFICATION OF POTENTIAL SIGNIFICANT EFFECTS

6.1 Potential Significant Effects

The potential for likely significant effects on the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA were considered further in this section. The key output of this stage of the assessment is the identification of likely significant effects of the Development alone and in combination with other plans and projects on relevant European sites without the implementation of mitigation measures between 1980 and the present day.

Table 6-1, Table 6-2, and Table 6-3 present further details and the rationale for the screening assessment undertaken for each of the European sites identified as potentially significantly affected by the Development, in light of their site conservation objectives and the best available scientific knowledge.

Table 6-1: Screening Assessment: Annex I Bird Species for Dingle Peninsula SPA

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Fulmar	This species is known to breed on sea cliffs but will also nest on the ground, on buildings and in burrows and crevices. This species winters at sea but can also be seen in Irish waters throughout the year. This species is known to have a diet of fish, discards from trawlers, crustaceans and whale flesh [31]. The NBDC held records of this species within 2km of the Site [15]. During the survey, no potential nesting or foraging habitat was identified within the Site. These conclusions are supported by the ornithological report from Goldcrest Environmental Services Ltd., which recorded no fulmars during the 12 months of surveying. The closest nesting and foraging habitat is likely ca. 7.4km northwest of the Site at Anscaul Lough and over 300m south of the Site in Dingle Bay, respectively.	**Main / Possible threats to the habitat include:** - Effects associated with pollution during the Construction and Operational Phase - Decrease in water quality may affect the availability of prey for fulmar.	Although there are records of fulmar within 2km of the Site [15], no suitable foraging habitat was present within the Site and no evidence of this species was identified within the Site boundary or its adjacent habitats during the field survey conducted by MOR Environmental or the ornithological surveys undertaken by Goldcrest Environmental Services Ltd. Nonetheless, there is potential for indirect hydrological connections to Dingle Bay via groundwater and surface water, which lies ca 300m south of the Site. Sediment and silt have the potential to clog fish gills, degrade spawning habitat and cover / smother aquatic vegetation. Therefore, these pollutants could directly affect aquatic species or indirectly affect avian species, such as fulmar, by reducing the availability and quality of foraging opportunities within the SPA. In addition, hydrocarbons have the potential to change the chemical balance of a waterbody and are persistent in the environment, which can prove toxic to fish and other wildlife, such as fulmar. It is considered unlikely that surface water run-off from the Site could have had any significant direct or indirect negative effects on this species, as any pollutants present in the surface water runoff from the Site would have needed to flow across the road, bypassing any drainage infrastructure associated with the road, and enter the drainage ditch. From the drainage ditch, which was heavily vegetated at the time of the field survey, these pollutants would have to flow into the stream, reach Castlemaine Harbour and then flow into Dingle Bay. These obstacles are considered substantial, and this potential impact pathway was likely not functional during the Construction Phase of the Development. Regarding groundwater, silt and sediment can be discounted. However, hydrocarbons and other deleterious materials may have been transferred via this pathway, albeit with a low risk	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
			of impact due to natural filtration and dilution within the groundwater body. It is considered unlikely that the quantity of hydrocarbons required to result in a significant effect on Dingle Peninsula SPA and its designated species was present on the Site during the Construction Phase, and certainly, there is no evidence of a historical spillage of this scale. The waste held in the septic tanks during the Operational Phase of the Development was a potential source of pollutants. As with hydrocarbon pollution, large amounts of waste from septic tanks would need to leak into groundwater and bypass natural filtration processes to significantly affect Dingle Bay and, subsequently, prey availability for this species. Assuming the worst-case scenario, i.e., total failure of the septic tanks resulting in discharge at full capacity, it is considered unlikely that pollutants would reach the sea. A recent inspection of the wastewater system concluded that the septic tank and associated pipeline are in good working condition (see Appendix D). As such, the potential for significant wastewater discharge from the septic tanks can be ruled out. If pollutants, regardless of source or pathway, reached the sea, the amounts would likely have been small. Given the bay's assimilative capacity and the small quantities of pollutants, the effects would not have been significant. Nonetheless, as the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated species under the Dingle Peninsula SPA, such as fulmar, are protected from both direct and indirect effects associated with water quality impairment.	
Peregrine	Peregrines are Irish residents that nest on coastal and inland cliffs and move away from their breeding habitat along	**Main / Possible threats to the habitat include:**	Although this species had the potential to occur across the wider area, no suitable nesting habitat or evidence of peregrine was found on the Site during the MOR	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	coasts or into cities during the winter. They prey on small- to medium-sized birds and sometimes small mammals. [32] Peregrine has a core foraging range of 2km with a maximum range of 18km [33]. The NBDC held records of this species within 2km of the Site [15]. However, the ornithological report recorded no peregrine within or near the Site during the twelve months of surveys (see Section 5.1.3). During the survey, no potential nesting habitat was identified within or adjacent to the Site. The closest nesting habitat is likely ca. 7.4km northwest of the Site at Anscaul Lough. Peregrine falcons were not recorded during the twelve months of the ornithology surveys. This suggests that the Site was of low suitability as a foraging habitat for this species.	- Effects associated with noise during the Construction Phase – An increase in noise may have caused temporary displacement of peregrine and/or reduced the availability of prey for peregrine within the Site. - Effects associated with habitat loss and/or degradation during the Construction Phase – Construction of the toilet block and hardstanding pitches, as well as the archaeological trenching, may have caused habitat degradation and/or loss and reduced the availability of prey for peregrine within the Site.	Environmental surveys or the ornithology surveys conducted by Goldcrest Environmental. Construction noise has the potential to directly affect fauna by causing disturbance and/or displacement or indirectly by reducing the quality and availability of predation opportunities due to disturbance and/or displacement of prey. It is considered unlikely that the construction noise resulting from the Development would have had a significant effect, directly or indirectly, on peregrine because the construction works were small in scale and temporary in nature, occurring over only a three-month period. Additionally, no piling was carried out during the Construction Phase. Habitat loss and/or degradation may directly and indirectly affect fauna by reducing the quality or availability of opportunity for resting, commuting, foraging / predation, or reproduction. The construction works and archaeological trenching caused permanent and temporary habitat loss or degradation, respectively. The archaeological trenching is considered temporary because the grassland has since been reinstated. The likelihood of a direct significant effect on peregrine due to habitat loss or degradation is considered negligible. This is due to the lack of cliffs within the Site; as such, there is no suitable resting or nesting habitat available for this species. Therefore, there was no direct effect on peregrine because of habitat loss or degradation. Regarding the indirect effects of habitat loss or degradation, the effects are also considered insignificant. The primary prey of this species are small- to medium-sized birds, which are usually captured in the air while commuting to and from nesting or resting habitats. Pigeons, grouse and waders are typical prey species of peregrine. These species are ground-nesting, except for pigeons. However, no suitable nesting or foraging habitat or evidence of these species was recorded	

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
			during the MOR Environmental surveys or the ornithology surveys conducted by Goldcrest Environmental. Given the availability of suitable habitat for these prey species across the wider landscape, it is unlikely that the Site served as a key foraging habitat for peregrines. This is supported by the lack of peregrine recorded during the ornithology surveys. Therefore, this species has been screened out and will not require further assessment.	
Chough	Chough nest in caves and crevices along the coast and on occasion in old buildings. They disperse from their nesting habitat to coastal sites more favourable for wintering. They forage for a wide range of resources on sandy beaches, machair and dune slacks, including subterranean invertebrates, berries, grain, small mammals and birds. They are known to use their curved bills to dig for insects and their larvae. [34] As such, they prefer grassland habitats with sward heights of five meters or less [35] The NBDC held records of this species within 2km of the Site [15]. During the survey, no potential nesting habitat was identified within the Site.	**Main / Possible threats to the habitat include:** - Effects associated with noise during the Construction and Operational Phase – An increase in noise may have caused temporary displacement of chough within the Site. - Effects associated with habitat loss and/or degradation during the Construction Phase – Construction of the toilet block and hardstanding pitches, as well as the archaeological trenching, may have caused habitat degradation and/or loss.	Although this species had the potential to occur across the wider area, no suitable nesting or foraging habitat or evidence of cough was found on the Site during the MOR Environmental surveys or the ornithology surveys conducted by Goldcrest Environmental. This historical use of the Site supports these findings. As per the rationale described for peregrine above, the effects associated with construction noise would not have been significant and therefore would not have undermined the SPA's conservation objectives for chough. There is no likelihood of a direct significant effect on chough due to habitat loss or degradation. This is due to the lack of cliffs within the Site; as such, there is no suitable resting or nesting habitat available for this species. Similarly, the surveys conducted by MOR Environmental concluded that the Site did not provide suitable foraging habitat for the cough, as they lacked the ideal sward height preferred by this species. Given the Site's historical use, the sward height likely exceeded the ideal height due to insufficient low-intensity agricultural management during the Construction and Operational Phases. Additionally, the closest nesting habitat was likely ca. 7.4km northwest of the Site at Anscaul Lough [36]. Choughs prefer foraging habitats near their breeding habitat [37]. Therefore, the Site was less likely to serve as a foraging habitat for this species. These findings were reinforced by the	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
			conclusions of the ornithology report, as the only records of chough were reported outside the survey area. Therefore, this species has been screened out and will not require further assessment.	

Table 6-2: Screening Assessment: Annex I Habitats – Castlemaine Harbour SAC

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Estuaries	The Conservation Objectives for this SAC show that this habitat is limited to the inner reaches of Dingle Bay [38]. This is known as Castlemaine Harbour. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) and the Castlemaine Harbour (Q70, V69 and V79) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys, and given the nature of this designated habitat, would not have been present within the Site during the Development timeline.	**Main / Possible threats to the habitat include:** - Effects associated with sedimentation resulting from works during the Construction Phase - alterations to the estuary's sediment community distribution. - Effects associated with pollution, including wastewater during the Operational Phase and accidental spillage of hydrocarbons (fuels and/or lubricants) during the Construction Phase.	Although this habitat was not within the Site boundary, there was potential for an indirect surface water hydrological connection between the Site and the estuary habitat within the SAC during the Construction Phase of the Development. Nonetheless, there is potential for indirect hydrological connections to Dingle Bay via groundwater and surface water, which lies ca 300m south of the Site. Sediment and silt can directly or indirectly affect aquatic habitats, such as estuaries, by altering sediment communities, blanketing / smothering aquatic flora and fauna, and introducing insoluble toxins. In addition, hydrocarbons can alter the chemical balance of a water body and persist in the environment, which can be toxic to fish and other wildlife. By a similar rationale used in Table 6-1, it is considered unlikely that surface water-off from the Site could have had any significant direct or indirect negative effects on this habitat, as any pollutants present in the surface water runoff from the Site would have needed to flow across the road, bypassing any drainage infrastructure associated with the road, and enter the drainage ditch. From the drainage ditch, which was heavily vegetated at the time of the field survey, these pollutants would have to flow into the stream and reach Castlemaine Harbour. These obstacles are considered substantial, and this potential impact pathway was likely not functional during the Construction Phase of the Development. Regarding groundwater, silt and sediment can be discounted. However, hydrocarbons and other deleterious materials may have been transferred via this pathway, albeit with a low risk of impact due to natural filtration and dilution within the groundwater body. Additionally, groundwater likely flows toward the outer section of Dingle Bay. In this case, the pollutant would need to travel south along Inch sand spit to reach the Castlemaine Harbour SAC. It is considered unlikely	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
			that the quantity of hydrocarbons required to result in a significant effect on the aquatic habitats of the Catlemaine Harbour SAC was present on the Site during the Construction Phase, and certainly, there is no evidence of a historical spillage of this scale. The waste held in the septic tanks during the Operational Phase of the Development was a potential source of pollutants. As with hydrocarbon pollution, large amounts of waste from septic tanks would need to leak into groundwater and bypass natural filtration processes to significantly affect Dingle Bay and Castlemaine Harbour, subsequently affecting the water quality of the SAC. Assuming the worst-case scenario, i.e., total failure of the septic tanks resulting in discharge at full capacity, it is considered unlikely that pollutants would reach the sea. A recent inspection of the wastewater system concluded that the septic tank and associated pipeline are in good working condition (see Appendix D). As such, it is concluded that no significant effects on the water quality of the Castlemaine Harbour SAC or its designated aquatic habitats occurred via groundwater during the Operational Phase of the Development. If pollutants, regardless of source or pathway, reached the sea, the amounts would likely have been small. Given the bay's assimilative capacity and the small quantities of pollutants, the effects would not have been significant. Nevertheless, as the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated habitats under the Castlemaine Harbour SAC are protected from both direct and indirect effects associated with water quality impairment.	
Mudflats and sandflats not covered by	The Conservation Objectives Report show that this habitat is not present in	**Main / Possible threats to the habitat include:**	As per estuaries in relation to water quality effects	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
seawater at low tide	the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was located over 85km away from the Site at its nearest point. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) and the Castlemain Harbour (Q70, V69 and V79) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	- Effects associated with sedimentation resulting from works during the Construction Phase - alterations to the estuary's sediment community distribution. - Effects associated with pollution, including wastewater during the Operational Phase and accidental spillage of hydrocarbons (fuels and/or lubricants) during the Construction Phase.		
Annual vegetation of drift lines	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Rosbehy, located over 5.5km southeast of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on annual vegetation of drift lines can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	have been present within the Site during the Development timeline.			
Perennial vegetation of stony banks	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at the far end of Inch Beach, located over 4.4km south of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on perennial vegetation of stony banks can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**
Vegetated sea cliffs of the Atlantic and Baltic coasts	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch Beach, located over 209m southwest of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on vegetated sea cliffs of the Atlantic and Baltic coasts can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.			
Salicornia and other annuals colonising mud and sand	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch sand spit, located over 5.1km southeast of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2013 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [40, 42]. Conversely, the reporting from 2019 and 2025 period does not include Q60 in the distribution for this habitat. Reviewing the available Article 17 polygon shapefiles for this habitat from 2019 and the conservation objectives document maps (2011) shows no changes between these reporting periods, suggesting the change in distribution is more likely due to changes in the distribution calculation methodology than to anthropogenic or natural changes in distribution. This habitat was not recorded during the surveys and, given its nature, would not	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on salicornia and other annuals colonising mud and sand can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	have been present within the Site during the Development timeline.			
Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch sand spit, located over 462m southeast of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2013 and 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [40, 42, 41]. Conversely, the 2019 reporting does not include Q60 in the distribution for this habitat. Taking the nature of the habitat into account and reviewing the available Article 17 polygon shapefiles for this habitat from 2019 and the conservation objectives document maps (2011) shows no changes between these reporting periods, suggesting the change in distribution is more likely due to changes in the distribution calculation methodology than to anthropogenic or natural changes in distribution [43]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on Atlantic salt meadows can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Mediterranean salt meadows (*Juncetalia maritimi*)	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch sand spit, located over 403m southeast of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2013 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 41, 42]. The 2007 report does not provide a habitat distribution for this habitat. However, considering the nature of the habitat, the distribution of the following reporting periods is considered representative of the 2007 reporting period. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on Mediterranean salt meadows can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**
Embryonic shifting dunes	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch Beach, located over 111m south of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on embryonic shifting dunes can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	reduction in habitat area and/or distribution.		
Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch Beach, located over 94m south of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on white dunes can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**
Fixed coastal dunes with herbaceous vegetation (grey dunes)*	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch Beach, located over 10m south of the Site at its nearest point [39].	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development –	Given the nature and scale of the Development, the lack of overlap between the Site and the SAC, and the terrestrial nature of this habitat, the likelihood of significant effects on grey dunes can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	excavation, causing a reduction in habitat area and/or distribution.		
Dunes with *Salix repens ssp. argentea* (*Salicion arenariae*)	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was at Inch sand spit, located over 2.9m south of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was not distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and either the SAC or the habitat distribution and the terrestrial nature of this habitat, the likelihood of significant effects on dunes with *Salix repens ssp. argentea* can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**
Humid dune slacks	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation	Given the nature and scale of the Development, the lack of overlap between the Site and either the SAC or the habitat distribution and the terrestrial nature of this habitat, the	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	habitat was on the Inch sand spit, located over 607m south of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 41, 42]. This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.	and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	likelihood of significant effects on humid dune slacks can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	
Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*)*	The Conservation Objectives Report show that this habitat is not present in the immediate vicinity of the Site [38]. The nearest recorded location of this habitat was in the Laune River catchment, located over 14.0km southeast of the Site at its nearest point [39]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 and 2025 shows that this habitat was distributed within the 10km square containing the Site (Q60) [40, 41]. Conversely, reporting from 2013 and 2019 suggested this habitat was distributed within Q60 [40, 41]. The changes in distribution are reported to be due to improved knowledge and that no net loss in area had occurred [41].	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase of the Development – excavation, causing a reduction in habitat area and/or distribution.	Given the nature and scale of the Development, the lack of overlap between the Site and either the SAC or the habitat distribution and the distance between the Site and the nearest recorded location of this habitat being over 14.0 km, the likelihood of significant effects on alluvial woodland can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	This habitat was not recorded during the surveys and, given its nature, would not have been present within the Site during the Development timeline.			

Table 6-3: Screening Assessment: Annex II Species for the Castlemaine Harbour SAC

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Sea Lamprey (*Petromyzon marinus*)	Sea lamprey utilise freshwater habitats as nurseries. They spawn in pairs and small groups in the lower reaches of large and small rivers. They build redds in sediments composed of small cobbles and pebbles. Two weeks post-spawning, lamprey larvae, called ammocoetes, hatch and are washed downstream to waters that have a slower current. They burrow into stable sandy silt rich in organic matter. This is where they remain for three to six years, until they become adults [44]. The NBDC did not hold any records of sea lamprey within 2km of the Site [15]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this species was not distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 45, 46]. The distribution of this species across the Construction and Operational	**Main / Possible threats to the habitat include:** - Effects associated with sedimentation resulting from works during the Construction Phase - alterations to the estuary's sediment community distribution. - Effects associated with pollution, including wastewater during the Operational Phase and accidental spillage of hydrocarbons (fuels and/or lubricants) during the Construction Phase.	Although there is potential for an indirect hydrological connection to the Castlemaine Harbour, no suitable habitat or evidence of lamprey species was observed during the MOR Environmental surveys. The harbour does not fall within the distribution for this species. Similarly, the Site, drainage ditch, and unnamed stream were also outside the distribution for this species. The short upstream distance from the harbour and the stream's vegetated nature made it unsuitable as a spawning habitat for aquatic species such as sea and river lamprey and salmon. The potentially significant effects resulting from pollutants such as hydrocarbons, sediment and silt on aquatic species, such as lamprey, are discussed in Table 6-1. These are relevant to lamprey, and they can reduce the availability and quality of opportunities for commuting, foraging and reproduction within the SAC. As per the rationale for fulmar in Table 6-1, it is considered unlikely that surface water run-off from the Site could have had any significant direct or indirect negative effects on this species. In addition to the existing substantial obstacles along this pathway, the assimilative capacity and upstream distance to the spawning habitat within the distribution for lamprey species would halt the flow of sediment. Further supporting	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	Phases was restricted to Q80 and V89, which fall within the Main and Laune River catchments, respectively. Suitable habitats were not present for this species within or adjacent to the Site.		that this impact pathway was likely not functional during the Construction Phase of the Development. Regarding groundwater, silt and sediment can be discounted. However, hydrocarbons and other deleterious materials may have been transferred via this pathway, albeit with a low risk of impact due to natural filtration and dilution within the groundwater body as well as the assimilative capacity of the harbour itself. Additionally, groundwater likely flows toward the outer section of Dingle Bay. In this case, the pollutant would need to travel south along Inch sand spit to reach the harbour. It is considered unlikely that the quantity of hydrocarbons required to result in a significant effect on the aquatic habitats of the Catlemaine Harbour SAC was present on the Site during the Construction Phase, and certainly, there is no evidence of a historical spillage of this scale. The waste held in the septic tanks during the Operational Phase of the Development was a potential source of pollutants. However, because a recent inspection of the wastewater system found the septic tanks and associated pipeline in good working condition (see Appendix D), the potential for significant wastewater discharge from the septic tanks and the resulting significant effects can be ruled out. If pollutants, regardless of source or pathway, had reached the drainage ditch and stream, the effects would not have been significant due to the small volumes involved. Nevertheless, as the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated species under the Castlemaine Harbour SAC, such as lamprey, are protected from both direct and indirect effects associated with water quality impairment.	

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
River Lamprey *(Lampetra fluviatilis)*	Sea and river lamprey have similar life cycles but differ in their spawning habitat and sediment preferences. River lamprey prefer sandy or gravely sediment over the small cobbles and pebbles preferred by sea lamprey [44]. The NBDC held no records for river lamprey within a 2km of the Site [15]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this species was not distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 40, 45, 46]. The closest distribution 10km squares during the Development's timeline are Q90 (2007) and V79 (2007, 2013) and V89 (2019), which fall within the Maine (Q90) and Laune (V79 and V78) River catchments (2019). Suitable habitats were not present for this species within or adjacent to the Site.	As per sea lamprey.	As per sea lamprey.	**Screened In**
Salmon (*Salmo salar)*	Freshwater habitats are used by salmon only during their reproductive and nursery phases. Salmon require a variety of habitat conditions to accommodate individuals in both adult and juvenile phases. Shallow, fast-flowing water with moderately coarse substrate with cover is required for fry and parr. These must be close to holding	As per sea lamprey.	As per sea lamprey.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	pools with cover for adult salmon preparing to migrate or spawn. The transitional areas between pool and riffle are an example of ideal spawning habitat. In addition to an ideal spawning habitat, access must be clear for adults or have the appropriate flow and pool area adjacent to a barrier in order for adults to negotiate the barrier [47]. Salmon populations within the SAC are associated with the Maine and Laune River catchments. The Laune River catchment provides excellent nurseries, riffles polls and glides for this species. The NBDC held no records of Atlantic salmon within 2km of the Site or downstream of the closest watercourse, the unnamed stream [15]. A review of the Status of EU Protected Habitats and Species in Ireland from 2007 to 2025 shows that this species was distributed within the 10km square containing the Site (Q60) and the Castlemain Harbour (V69 and V79) during the Construction and Operational Phases of the Development [39, 40, 45, 46]. The results of the habitat survey suggest that the ditch and unnamed stream would not have provided suitable breeding, commuting or foraging habitat for salmon due to the lack of pools and riffles and, as such, the transitional			

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	areas between them and their highly vegetated nature.			
Otter *(Lutra lutra)*	Otter populations within the SAC are associated with the Maine and Laune River catchments. These catchments provide long stretches of river and stream that are considered excellent habitat for this species. The Laurne catchment is considered importan The NBDC held several records for otter within within a 2km boundary of the Site [15]. These records were located along the Emlaghmore River [EPA Code: 22E01] and dated 2005 and 2015. The otter survey did not identify any evidence of or suitable habitat for otter on-site or within close proximity to the Site including along the ditch and unnamed stream across the road to the Site.	**Main / Possible threats to the habitat include:** - -Effects associated with noise during the Construction Phase – An increase in noise may have caused temporary displacement of otters within the Site. - Effects associated with pollution during the Construction and Operational Phase - Decrease in water quality may affect the availability of prey for otters.	Although there was potential for an indirect hydrological connection between the Site and the SAC, there was no suitable foraging or commuting habitat or evidence of otter recorded downstream of the Site during the surveys conducted by MOR Environmental. Given the nature of the ditch and unnamed stream across the road from the Site, they were unlikely to have provided suitable foraging or commuting habitat for otters during the Construction and Operational Phases of the Development. The potentially significant effects resulting from pollutants such as hydrocarbons, sediment and silt are discussed in Table 6-1. These are relevant to the semi-aquatic species, otters, and can reduce the availability and quality of commuting and foraging opportunities within the SAC. As per the rationale for sea lamprey, it is considered unlikely that surface water run-off from the Site could have had any significant direct or indirect negative effects on this species, as the obstacles along this pathway are considered substantial, and therefore, this potential impact pathway was likely not functional during the Construction Phase of the Development. Regarding groundwater, it is considered more likely that the groundwater flows towards the sea rather than the drainage ditch or stream. Nonetheless, if there were a pathway via groundwater, silt and sediment can be discounted, and, by a similar rationale to that provided for fulmar in Table 6-1, the likelihood of a significant effect resulting from hydrocarbon spillage during the Construction Phase of the Development is considered extremely low.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
			As per the rationale for sea lamprey, the potential for significant wastewater discharge from the septic tanks and the resulting significant effects can be ruled out. If pollutants, regardless of source or pathway, had reached the drainage ditch and stream, the effects would not have been significant due to the small volumes involved. Nevertheless, as the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated species under the Castlemaine Harbour SAC, such as otter, are protected from both direct and indirect effects associated with water quality impairment.	
Petalwort (*Petalophyllum ralfsii)*	Petalwort is a thallose liverwort found in coastal dune systems with damp, calcareous dune slacks or machair. It thrives in early-development dune slacks and prefers compact, bare soil. The NBDC held no records of this species with 2km of the Site [15]. A review of the Status of EU Protected Habitats and Species in Ireland from 2013 to 2025 shows that this species was distributed within the 10km square containing the Site (Q60) during the Construction and Operational Phases of the Development [39, 45, 46]. This species or suitable habitat was not recorded during surveys. In order for there to have been a suitable habitat within the Site for this species, the parcels would have required intensive	**Main / Possible threats to the habitat include:** - Effects associated with habitat degradation and/or loss during the Construction Phase.	Given the terrestrial nature of this qualifying interest, the lack of overlap between the Site and the SAC boundary, and the absence of suitable habitat on the Site, the likelihood of significant effects on pertalwort arising from habitat degradation and/or loss can be ruled out. Therefore, this habitat has been screened out and did not require further assessment.	**Screen out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	grazing. Based on the timeline of the Development, this has not been the case since at least the 1980's. Suitable habitat was not present for this species within or adjacent to the Site.			

Table 6-4: Screening Assessment: Annex I Bird Species for Castlemaine Harbour SPA

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Red-throated Diver	This species breeds primarily in northern Europe (Russia, Scandinavia, Iceland, Scotland). Small populations of this species breed in Ireland and area restricted to Co. Donegal. This species nests in aquatic vegetation near the water's edge and has been known to exhibit site fidelity by returning to the same nest site. This species winters in Irish coastal waters, arriving in September from its breeding grounds. This species is typically found wintering in shallow sandy bays. This species is known to have a diet of small fish, shrimp, frogs, molluscs, water insects and annelids [27]. The NBDC held records of this species within 2km of the Site during the Development timeframe [15]. Internationally or nationally important numbers were not recorded at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy. During the survey, no potential wintering or foraging habitats were identified within or immediately adjacent to the Site. No records of this species were obtained during the ornithological surveys, reinforcing that the Site did not provide suitable habitat for this species.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	No suitable habitat or evidence of red-throated diver was observed during the MOR Environmental surveys or ornithological surveys conducted by Goldcrest Environmental Ltd. Records of this species were identified within 2km of the Site on NBDC and nearby I-WeBS subsites. However, the lack of suitable wintering or foraging habitat within 100m of the Site rules out the potential for noise disturbance of this species during the Construction Phase of the Development. The potentially significant effects resulting from pollutants such as hydrocarbons, sediment and silt on aquatic species and avian species that rely on them, such as red-throated diver, have been discussed in Table 6-1. They can reduce the availability and quality of opportunities for foraging avian species within the SAC. As per the rationale for fulmar in Table 6-1. It is considered unlikely that any surface water run-off or groundwater pollution from the Site could have had any significant direct or indirect negative effects on this species, as these impact pathways were likely not functional during the Construction Phase of the Development, and if they were actualised, the volumes of pollution were likely minimal to the extent that the effects on water quality were negligible. Nevertheless, as the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated avian species under the Castlemaine Harbour SPA, such as red-throated diver, are protected from both direct and indirect effects associated with water quality impairment.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Cormorant	Cormorants breed in colonies around the coastline. Typically, large colonies are located along the southern and north-western coastal cliffs of Ireland, and some birds have been observed nesting in trees. This species is also known to winter along the coastline, at sea or in inland water bodies. This species is known to eat fish. [48] The NBDC held records of this species within 2km of the Site during the Development timeframe [15]. Internationally or nationally important numbers were not recorded at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy. However, nationally important numbers were recorded for this species at the Castlemaine Outer (Inch Offshore) subsite in 2021/22. During the survey, no potential nesting sites or suitable nesting or foraging habitats were identified within or immediately adjacent to the Site. The ornithology report notes that cormorants were among the most common species recorded during the survey year. These records were all Overflying over five meters, indicating this species was commuting to or from preferred habitats. This supports the findings of the habitat assessment above.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	There was no suitable breeding, resting, or foraging habitat for cormorant recorded during the MOR Environmental surveys and individuals of this species were observed overflying, but not utilising, the Site during the ornithology surveys conducted by Goldcrest Environmental Ltd. Cormorant. If cormorants were present within or adjacent to the Site during the Development, it is unlikely that any disturbance caused during the Construction Phase was sufficient to undermine the conservation objectives regarding the population trend or distribution of this species, given that the works were small-scale and temporary. Therefore, no significant effects due to the disturbance of the cormorant were likely. As per the rationale for red-throated diver, the potential risk to water quality and prey availability for cormorant cannot be ruled out. Therefore, this species has been screened in and will require further assessment.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Light-bellied Brent Goose	Light-bellied Brent geese winter in Ireland primarily from October to April, feeding predominantly on eel-grass (*Zostera spp.*) that grows in estuaries [49]. However, in January / February, when the concentrations of Zostera grasses tend to be depleted by the wintering birds, Brent geese will move to inland ex-situ feeding sites [49]. Brent geese will utilise these ex-situ feeding sites until March / April when Brent geese will return to the coastal feeding sites, as the Zostera grasses have replenished, before then migrating to their breeding grounds [50]. The NBDC held records of this species within 2km of the Site during the Development timeframe [15]. Internationally and nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy. During the survey, no primary habitat for this species was found, and the ornithology report suggests the Site was not used for foraging, with no light-bellied Brent geese recorded during 12 months of surveys.	**Main / Possible threats to the species include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	Although no primary habitat for this species was found on the Site, grassland is a secondary habitat during the winter months, when Zostera grasses are depleted. However, light-bellied Brent geese are known for site fidelity and will return to the same foraging habitats every year. The ornithological surveys concluded that the Site was of low value to wetland birds, with no records of light-bellied geese using the Site or habitat within 100m of it. As such, it is considered unlikely that this species utilised the Site as a foraging habitat during the Development's timeline. In the unlikely situation that the Site was used by this species during the Construction Phase of the Development, the construction would not have resulted in significant effects due to disturbance on the light-bellied Brent geese of the Castlemaine Harbour SPA due to the temporary nature and small scale of the construction and the vast availability of temporary alternate secondary foraging habitat within the wider landscape. As per the screening rationale for red-throated diver, it is unlikely that the Development resulted in significant effects with regard to water quality on the foraging habitat for light-bellied geese due to the unlikelihood of the relevant pollutant pathway being actualised. As the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated avian species under the Castlemaine Harbour SPA, such as light-bellied Brent goose, are protected from both direct and indirect effects associated with water quality impairment.	**Screened In**
Mallard	Mallards are ground-nesting residents and among the most widespread species in Ireland. They can be found at most wetland sites. They have a varied	**Main / Possible threats to the habitat include:**	As per red-throated diver.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	diet of plant and animal materials, including seeds, molluscs and crustaceans. They are relatively social bird that will readily accept food from humans. [51] The NBDC held records of this species within 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy during the 2013/14, 2015/16, 2020/21 and 2022/23 seasons. During the survey, no potential nesting sites or suitable nesting or foraging habitats were identified within or immediately adjacent to the Site. Furthermore, the unnamed stream provides no suitable foraging habitat in the vicinity of the Site, as it has no flow. Mallard was not recorded during the ornithology surveys either, and the report reinforces that the Site does not provide optimal habitat for this species.	- Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.		
Pintail	Only a small number of pintails have been recorded breeding in Ireland; this species tends to nest in dense vegetation in freshwater swamps, small lakes and rivers. This species migrates to Ireland to winter in brackish lagoons, estuaries and large inland lakes and is known to form large flocks. [52] The NBDC held records of this species within 2km of the Site during the	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy. During the survey, no potential nesting sites or suitable nesting or foraging habitats were identified within or immediately adjacent to the Site. Furthermore, the unnamed stream provides no suitable foraging habitat in the vicinity of the Site, as it has no flow. Pintail was not recorded during the ornithology surveys either, and the report reinforces that the Site does not provide optimal habitat for this species.			
Scaup	Scaups nest beside the shallow tundra pools and lakes of Greenland, Iceland, northern Scandinavia and Siberia. They winter on the brackish lagoons and shallow marine waters of Ireland's estuaries and bays, where they feed predominantly on crustaceans and molluscs. [53] The NBDC held no records of this species within 2km of the Site during the Development timeframe [15]. Internationally and nationally important numbers were not recorded for this species at the nearby I-WeBS sites. There were no potential wintering or foraging habitats identified within or immediately adjacent to the Site.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Common Scoter	This species nests on islands with dense scrub and tree cover; however, the breeding population has been declining in recent years due to mink predation. This species is almost entirely marine during the winter season and will congregate in large flocks on shallow seas (less than 20m deep) with sandy bottoms. This species is known to have a diet of aquatic plants, insect larvae and freshwater crustaceans during the breeding season and primarily molluscs during the winter season. [54] The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy (2017/18 and 2018/19) and the Castlemaine Outer: Inch Offshore (2017/18). The Site did not provide any nesting, wintering, or foraging habitat for this species. No common scoter were recorded during the ornithological surveys.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**
Oystercatcher	This species breeds predominantly along the Irish coastline, on beaches, dunes, salt marshes and rocky shores; however, it has been noted to nest on large inland lakes. This species is also	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the	Although no suitable habitat or evidence of oystercatcher was recorded within the Site during the MOR Environmental surveys, they were observed foraging in the field east of the Site, but not within the Site, during the ornithological surveys conducted by Goldcrest Environmental Ltd.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	known to winter in coastal habitats, preferably on sandy coasts. [55] The NBDC held records of this species within 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy in the 2016/17, 2021/22 and 2022/23 winter seasons. During the survey, no potential nesting sites or suitable wintering or foraging habitats were identified within the Site. However, just below half the oystercatchers recorded during the ornithological surveys were foraging in the grassland immediately east of the Site. The low suitability of the Site was evident from the lack of records of this species within the Site and from the overall evaluation, which concluded that it was of low value to target species.	Construction Phase - decrease in water quality, loss of available optimal habitat.	Construction works were small-scale and temporary, and an abundance of alternative habitats was available within the wider landscape during the short Construction Phase. Therefore, the likelihood of significant effects on oystercatcher as a result of construction-related noise disturbance is considered negligible. As per the screening rationale for the red-throated diver, it is unlikely that the Development resulted in significant effects on water quality in the oystercatcher's foraging habitat, given the unlikelihood that the relevant pollutant pathway would be actualised. As the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures were and will be implemented on a precautionary basis to ensure that designated avian species under the Castlemaine Harbour SPA, such as oystercatcher, are protected from both direct and indirect effects associated with water quality impairment.	
Ringed Plover	Ringed Plover breeds along coastal habitats and typically nests on exposed sandy or shingle beaches. This species has also been observed nesting in inland areas of western Ireland on short-grazed pasture beside lakes or rivers. This species winters in coastal areas of Ireland. [56] The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	The Site was not considered suitable as a secondary nesting habitat for the ringed plover, as this species prefers a short sward height. The Site has a management history of low-intensity grazing, which means the sward height was likely tall during the Development timeline. As such, it is unlikely there was suitable nesting habitat within the Site during the Construction or Operational Phase of the Development. As per the screening rationale for light-bellied Brent goose, it is considered unlikely there was any significant effects on ringed plover as a result of disturbance given the temporary nature and small scale of the construction works, the fact that the Site would not have provided primary habitat for this	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy during the 2014/15 and 2020/2021 seasons. During the survey, no potential nesting sites or suitable wintering or foraging habitats were identified within the Site. This was supported by the lack of records for this species during the ornithological surveys.		species, and that there was an abundance of alternate habitat throughout the wider landscape during the Construction Phase of the Development.	
Sanderling	This species is known to breed in the Arctic tundra and then migrates to Ireland in the winter. This species is known to winter along sandy non-estuarine coastlines. [57] The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy during the 2013/14, 2014/15, 2016/17, 2017/18, 2021/2022, and 2022/23 winter seasons. During the survey, no suitable wintering or foraging habitats were identified within the Site. This was unsurprising given the Site's proximity to the estuary. These findings were supported by the lack of records for this species during the ornithological surveys.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
Bar-tailed Godwit	This wader breeds in northern Europe, Norway and Finland, and winters entirely along the Irish coastlines, predominantly in sandy estuaries [58]. The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Internationally and nationally important numbers were not recorded for this species at the nearby I-WeBS subsites. During the survey, no suitable wintering or foraging habitats were identified within the Site. These findings were supported by the lack of records for this species during the ornithological surveys.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**
Redshank	Redshanks are ground-nesting birds that prefer nesting in grassy tussocks in wet, marshy areas and occasionally nest in heather. Redshank prefer to winter in mudflats, estuaries and inlets; however, small numbers have been noted in lakes and rivers. [59] The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy, every winter between 2013/14 and 2022/23, except for 2018/19 and 2019/20.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	The Site provided no suitable nesting, wintering or foraging habitats. Similarly, these habitats were not recorded adjacent to the Site either. These findings were supported by the absence of records of this species in the survey area during the ornithological surveys. However, their presence was noted outside the survey area.			
Greenshank	Though occasional pairs breed in Ireland, the primary European breeding habitat for greenshanks is found in the pool-dominated, boulder-strewn boglands of Scotland and the Scots pine woods of Scandinavia. They winter predominantly in Irish estuaries, though roughly a third of the population winter along non-estuarine coast. [60] The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy, every winter between 2013/14 and 2022/23, except for 2013/14, 2019/20 and 2021/22. No wintering or foraging habitats for this species was recorded on or adjacent to the Site. These findings were supported by the absence of records of this species in the survey area during the ornithological surveys. However, as with	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	redshank, greenshank were noted outside the survey area.			
Turnstone	This species is known to breed along Scandinavian shorelines and has not been recorded breeding in Ireland. This species winters along the Irish coastline, feeding on marine invertebrates, such as sandhoppers, and fish carrion. [61] The NBDC held records of this species with 2km of the Site during the Development timeframe [15]. Internationally and nationally important numbers were recorded for this species at the nearby I-WeBS subsites. The MOR Environmental surveys concluded that the Site provided no wintering or foraging habitats for this species. Similarly, these habitats were not recorded adjacent to the Site either. These findings were supported by the absence of records of this species during the ornithological surveys conducted by Goldcrest Environmental Ltd.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	As per red-throated diver.	**Screened In**
Chough	An overview of this species has been provided in Table 6-1.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase.	Although this species had the potential to occur across the wider area, no suitable nesting or foraging habitat or evidence of cough was found on the Site during the MOR Environmental surveys or the ornithology surveys conducted by Goldcrest Environmental. This historical use of the Site supports these findings. The sand spit at Inch is a known habitat for chough foraging and socialising. During the MOR Environmental surveys, it	**Screened Out**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
			was noted that the sward height within the SPA that fell within 100m of the Site exceeded the preferred height for chough, making it unlikely that chough were utilising the habitat adjacent to the road. In the unlikely event that chough were using this habitat during the Development timeline, it is considered unlikely that the construction noise resulting from the Development would have had a significant effect, directly or indirectly, on chough because the construction works were small in scale and temporary in nature, occurring over only a three-month period. Additionally, no piling was carried out during the Construction Phase. Therefore, this species has been screened out and did not require further assessment.	
Wigeon	Resident wigeon breed on the shallow freshwater marshes, adjacent to lakes and lagoons, or on lake islands. Their wintering habitat in Ireland extends to coastal marshes, estuaries and bays. Although their diet consists of primarily Zostera spp. And Enteromorpha spp., they are known to feed on grasslands and cereal crops. [62] The NBDC held no records of this species with 2km of the Site during the Development timeframe [15]. Nationally important numbers were recorded for this species at the nearby I-WeBS subsite, Castlemaine Harbour & Rossbehy, every winter between 2013/14 and 2022/23, except for 2015/16.	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	Similar to the light-bellied brent goose, while no primary habitat for this species was found on the Site, the grassland within the Site represents a possible foraging habitat for wigeon. Nonetheless, the ornithological surveys concluded that the Site was of low value to wetland birds, with no records of wigeon using the Site or habitat within 100m of it. As such, it is considered unlikely that this species utilised the Site as a foraging habitat during the Development's timeline. As per the screening rationale provided for the light-bellied brent goose, in the unlikely event that the Site was used by this species during the Construction Phase of the Development, construction would not have resulted in significant effects. Similarly, the screening rationale for the light-bellied brent goose, regarding the potentially significant effects on water quality in the relevant foraging habitat, can be applied to wigeon. As the risk cannot be completely ruled out, this qualifying interest is screened in for further assessment in relation to water quality impairment, and mitigation measures	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	The MOR Environmental surveys concluded that the Site provided no wintering or foraging habitats for this species. Similarly, these habitats were not recorded adjacent to the Site either. These findings were supported by the absence of records of this species during the ornithological surveys conducted by Goldcrest Environmental Ltd.		were and will be implemented on a precautionary basis to ensure that designated avian species under the Castlemaine Harbour SPA, such as wigeon, are protected from both direct and indirect effects associated with water quality impairment.	
Wetland and Waterbirds	SPA is designated for 'Wetland and Waterbirds [A999]'. Under S.I. No.194/2012, "waterbird" as 'any bird ecologically dependent on a wetland habitat wholly, or for at least part of their annual cycle' and "wetland" as areas of habitat containing water, whether natural or artificial, permanent or temporary, static or flowing, fresh, brackish, or marine [63]. The NBDC holds records for waterbird species within 2km of the Site [15]. Following the Site survey, the habitats present on-site are considered unsuitable for any other wetland or waterbird species. No wetlands or waterbirds were recorded during the MOR Environmental surveys. The ornithological surveys conducted by Goldcrest Environmental Ltd. Concluded that the Site was of low importance for foraging birds. Noting that records of wetland species were low, with no records of mallard, teal,	**Main / Possible threats to the habitat include:** - Disturbance during the Construction Phase. - Effects associated with pollution during the Construction Phase - decrease in water quality, loss of available optimal habitat.	No wetland habitat was recorded within the Site during the MOR Environmental surveys. Additionally, the Site was concluded as of low importance for foraging birds in the ornithological report provided by Goldcrest. This qualifying interest has been screened in on a precautionary basis as per the rationale provided for red-throated diver regarding potentially significant effects on water quality in off-site wetland habitats for waterbirds. Mitigation measures were and will be implemented on a precautionary basis to ensure that designated qualifying interests under the Castlemaine Harbour SPA are protected from both direct and indirect effects associated with water quality impairment.	**Screened In**

Qualifying Feature of Interest	Baseline	Potential Significant Effects	Screening Rationale	Screening Conclusion
	brent geese or wigeon overflying or foraging at the Site despite their abundance in the greater landscape.			

6.2 Stage 1 – Analysis of 'In-Combination' Effects

The Habitats Directive requires competent authorities to make an appropriate assessment of any plan or project which is likely to have a significant effect alone or in-combination with other plans and projects.

A review of Kerry County Council planning portal did not identify any current or previously granted plans or projects in the immediate vicinity that are considered likely in-combination with the Development to result in significant impact effects on any European Protected Sites.

The following planning applications listed in Table 6-5 have previously been assessed by Kerry County Council within the planning system, all of which are located within the vicinity of the Site.

Table 6-5: Active Planning Applications within the vicinity of the Site

Application Ref	Decision	Development Description	Appropriate Assessment
0694481	Conditional 21/03/2012	This development comprised of: (a) construction of an extension consisting of the erection of storage panels on the existing roof; (b) construction of a guest leisure and storage building; and (c) and ancillary works	No AA conducted for this development. There is no direct hydrological connectivity between the site of this Development and the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA. As such, there is no potential for an in-combination effect relating to changes in water quality on the qualifying interests of the above European Sites. The unlikelihood of significant effects via groundwater has been discussed at length for the Development. The rationale for the Development can be applied to this application. The amounts of pollutants required to cause a significant in-combination effect on the water quality of the relevant European sites would not have been present at the time of the development sites' application. Therefore, the potential for in-combination effects on water quality via groundwater on the relevant European sites has been ruled out. Given the nature and scale of the development and the distance between it and the relevant European sites, no in-combination effects due to noise-related disturbance on the qualifying interests of the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA, are considered likely or significant.
12608	Conditional 04/01/2013	This development consisted of: (a) construction of an extension to the existing shop (this application is a revised design of that previously granted, but not yet constructed, under planning ref. No. 10/207); (b) provision of additional Velux-style roof lights in the existing roof; and (c) all necessary site works.	There is no AA available on the KCC planning portal for this application. However, a SAC report provided with this application indicates that the development would have no adverse effects on the Castlemaine Harbour SAC. This application was granted an extension to February 2023 and likely occurred in parallel with the Development's Construction Phase to some degree. There was no direct hydrological connectivity to the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA. Any pollutants kept within either the application site or the Development Site were unlikely to have been present in sufficient volume to cause a significant effect on the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. Given the small scale and temporary nature of the works, no significant in-combination effects due to noise-related disturbance of qualifying interests of the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA were likely.
13705	Conditional 10/01/2014	Construction of a traditional shop front.	There is no AA available on the KCC planning portal for this application.

Application Ref	Decision	Development Description	Appropriate Assessment
			The works associated with this application likely occurred in parallel with the Development. However, there is no potential for direct hydrological connectivity between the application site and the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA. As such, there is no potential for in-combination effect pertaining to water quality on the qualifying interests of the above European sites. The scale, duration, and nature of the works associated with the application were small and temporary to the extent that no potential for significant in-combination effects due to noise-related disturbance of qualifying interests of the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA was considered likely.
119693	Conditional 10/05/2017	This development consisted of: (a) construction of an extension onto the western gable end of the cottage on site no. 3 of Inch Beach holiday cottages, for use as a lounge/sitting area; (b) insertion of Velux windows into the existing roof of this same cottage; and (c) all necessary site works	There is no AA available on the KCC planning portal for this application. The works associated with this application likely occurred in parallel with the Development. There was no potential for direct hydrological connectivity between the application site and the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA. Any pollutants kept within either the application site or the Development Site were unlikely to have been present in sufficient volume to cause a significant effect on the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. Considering the small scale, temporary nature, and distance between the works associated with the application and the above European sites, as well as the Development Site, there was no potential for significant in-combination effects from noise-related disturbance to the qualifying interests of the Dingle Peninsula SPA, Castlemaine Harbour SAC and SPA.
18168	Conditional 31/05/2018	Installation of a new wastewater treatment facility and percolation area.	The AAS for this application concluded that there would be no likely potential for significant effects to Natura 2000 sites and that AA would not be required. No hydrological connectivity between the application site and any European site was identified in the planner's report. Any pollutants stored or used within either the application site or the Development Site were unlikely to have been present in sufficient quantities to significantly affect the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. There was very limited potential for the works associated with this application to overlap with the Development's timeframe. The extent of work under the Development during this overlap was the installation of a security entrance barrier and a bin storage area. The small-scale and temporary nature of the works, as well as the distance between the application Site and the relevant European sites,

Application Ref	Decision	Development Description	Appropriate Assessment
			indicates that the likelihood of significant in-combination effects due to noise-related disturbance affecting the qualifying interests of the Dingle Peninsula SPA and Castlemaine Harbour SAC was negligible.
18223	Conditional 19/06/2018	Installation of a new wastewater treatment facility and percolation area.	The AAS for this application concluded that there was no likely potential for significant effects on Natura 2000 sites and that AA would not be required. No direct hydrological connectivity between the application site and any European site was identified. Any pollutants used within either the application site or the Development Site were unlikely to have been present in sufficient quantities to significantly affect the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. Although there was potential for the works associated with this application to partially overlap with the timeframe of the Development, the small-scale and temporary nature of the works, as well as the distance between the application Site and the relevant European sites, indicates that the likelihood of significant in-combination effects due to noise-related disturbance affecting the qualifying interests of the Dingle Peninsula SPA and Castlemaine Harbour SAC was negligible.
21978	Conditional 19/10/2021	This development consisted of : (a) Construction of a series of extensions (b) material alterations to the existing one; (c) construction of a half-storey dwelling; (d) all ancillary site works	The AAS for this application concluded that there was no likely potential for significant effects on Natura 2000 sites and that AA would not be required. No direct hydrological connectivity between the application site and any European site was identified. Any pollutants used within either the application site or the Development Site were unlikely to have been present in sufficient volume to cause a significant effect on the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. Although there was potential for the works associated with this application to overlap with the timeframe of the Development, works, as well as the distance between the application Site and the relevant European sites, the small-scale and temporary nature of the works indicates that the likelihood of significant in-combination effects due to noise-related disturbance affecting the qualifying interests of the Dingle Peninsula SPA and Castlemaine Harbour SAC was negligible.

Application Ref	Decision	Development Description	Appropriate Assessment
22464	Conditional 29/06/2022	This development included alterations to the elevations of houses 2, 3, 4, 5 and 6	These applications relate to the development of buildings within the same holiday home complex. AAS for these applications concluded that there was no likely potential for significant effects on Natura 2000 sites and that AA would not be required. No direct hydrological connectivity between the application site and any European sites was identified. Any pollutants within either the application site or the Development Site were unlikely to have been present in sufficient quantities to have a significant in-combination effect on the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. The potential for overlap between the timeframes of these projects was limited. The works associated with the Development included the installation of a security barrier and a bin area. These works are considered so small in scale that the potential for in-combination significant noise-related disturbance affecting the qualifying interests of the Dingle Peninsula SPA and Castlemaine Harbour SAC was negligible.
221030	Conditional 22/11/2022	This development included alterations to the elevations of houses 1, 4, 7, 8 and 9	
2360043	Conditional 23/11/2023	Retain storage shed building as constructed on site and to retain balcony window to side of guest house on site and full permission to construct a single storey extension to the front and side (southwestern and north- western elevations) of guest house on site thus creating sunrooms off the existing rooms and including all associated site works and permission to upgrade with wastewater treatment system on site to include the installation of a new sand polishing filter	The AAS for this application concluded that there was no likely potential for significant effects on Natura 2000 sites and that AA would not be required. No direct hydrological connectivity between the application site and any European site was identified. Any pollutants kept within either the application site or the Development Site were unlikely to have been present in sufficient volume to cause a significant in-combination effect on the water quality of the relevant European sites. Therefore, significant in-combination effects related to water quality have been ruled out. Although there was potential for the works associated with this application to overlap with the timeframe of the Development, works, as well as the distance between the application Site and the relevant European sites, the small-scale and temporary nature of the works indicates that the likelihood of significant noise-related disturbance affecting the qualifying interests of the Dingle Peninsula SPA and Castlemaine Harbour SAC was negligible.

It is therefore considered that the Development is unlikely to have any significant in-combination contribution to possible significant effects on European Sites.

This statement is supported by:

I. The distances separating the Site from European sites;

II. The lack of hydrological connectivity; and,

III. The localised nature of the proposed works.

However, based on a precautionary approach, as identified in Section 6.1, a number of qualifying features require further consideration and appropriate mitigation measures to ensure that the Proposed Development alone will not lead to in-combination effects with any proposed future developments.

6.3 Stage 1 – AA Screening Conclusion

A detailed assessment of the layout and nature of the Development, the construction methods that were employed and the overall activities that occurred at the Site during construction and operation has been carried out, and the potential for significant effects on European sites and qualifying features of interest within the zone of influence of the Site has been examined in detail.

The boundaries of 7 designated sites, 5 SACs and 2 SPAs, were screened out given the distances separating the Site from these European sites and lack of impact pathways. It could be objectively concluded that the Development will not, either alone or in combination with other plans or projects, be likely to have significant effects on those sites.

Given the proximity of the Castlemaine Harbour SAC and SPA, there is potential for a weak hydrological connection between the Site and the Castlemaine Harbour SAC and SPA via surface runoff across the road. Additionally, there is potential for hydrological connectivity between the Site and the Castlemaine Harbour SAC and SPA via groundwater. The Site is also located within the Dingle Peninsula SPA. Therefore, these sites were taken forward for further detailed consideration, Stage 2 Appropriate Assessment. Using professional experience, guidance and judgement, the following factors have been taken into account on identifying potential significant effects on the identified European site:

- Qualifying interests;
- Special conservation interests;
- Conservation objectives;
- The nature of the on-site habitats; and,
- The location of the Site.

The screening process has examined the potential for the Development to have caused any significant effects on European sites and the qualifying features of interest as per the screening determination in Section 4.

Based on the above factors, it was deemed unlikely that the Development would have caused a significant effect on the European sites or their qualifying interests. However, as the potential for hydrological connectivity could not be ruled out completely and taking a precautionary approach, the screening exercise identified the following designated habitats and species as potential receptors of significant likely effects as a result of the Development, in the absence of appropriate mitigation:

<u>Habitats</u>

- Estuaries; and,
- Mudflats and sandflats not covered by seawater at low tide.

<u>Species</u>

- Sea Lamprey;
- River Lamprey;
- Salmon;
- Otter;
- Fulmar;
- Red-throated Diver;
- Light-bellied Brent goose;
- Mallard;
- Pintail;
- Scaup;
- Common Scoter;
- Oystercatcher;

- Ringed Plover;
- Sanderling;
- Bar-tailed Godwit;
- Redshank;
- Greenshank;
- Turnstone;
- Wigeon; and,
- Wetland and Waterbirds.

Therefore, the European sites associated with these qualifying features of interest have been brought forward for further consideration.

As such, progression to Stage 2 of the Appropriate Assessment process is required in the light of current case law on mitigation measures.

Section 7 below further addresses potential issues arising from the Development and the mitigation measures required to negate any potential significant likely effects on this European Site.

7 STAGE 2 RNIS

7.1 Assessment of Potential Significant Effects

This section provides recommendations for measures which will mitigate against any adverse effects on the integrity of the identified European site as a result of the Proposed Development. The following effects with the potential to adversely affect the conservation objectives of the Dinge Peninsula SPA, Castlemaine Harbour SAC and SPA were considered:

- Potential impairment of water quality during the Construction and Operational Phases.

The screening exercise did not identify any other factors that would result in any likely significant effects.

7.1.1.1 Potential impairment of water quality during the Operational Phase

Given the proximity of the Site to the Castlemaine Harbour SPA & SPA and the potential for an indirect hydraulic connection, and on the basis that the Site is located within the Dingle Peninsula SPA, albeit within an area that has been assessed to be a habitat that is not of importance for the qualifying species of interest, the following precautionary mitigation measures are proposed:

Inch Beach Houses and Cottages will ensure visitor numbers at the Site do not exceed the carrying capacity of the Septic Tank and Wastewater Treatment System. Details of the carrying capacity will be confirmed and provided to KCC. Additionally, visitor logs will be maintained at the Site for inspection by the Council.

As noted in Section 3, the wastewater system has been maintained in recent years with services provided to de-sludge the tanks and unblock the drains (see Appendix B). The most recent inspection of the system indicates that the septic tanks and associated pipelines are in good working condition. To ensure that the Septic Tank and Wastewater Treatment System continues to be maintained properly and functions as per the manufacturer's specifications, the system will be periodically inspected by a suitably qualified technician and upgraded when required. Inspection reports will be submitted to Kerry County Council.

Therefore, it can be concluded that the Operational Phase of the development will not have any adverse effects on surface water or groundwater quality and subsequently will not cause any adverse effects to qualifying species or habitats of any European sites. In addition, there will be no adverse effects on the integrity of any European sites in relation to their conservation objectives.

7.2 Stage 2 - Analysis of 'In-Combination' Effects

Based on the mitigation measures as described in Section 7.1, the Development alone will not have any direct or indirect adverse effects on the integrity of any European Sites.

Following a review of the Kerry County Council Planning Files [12], and the Department of Housing, Local Government and Heritage's planning portal – the National Planning Application Database, as listed in Table 6-5, no current or previously granted plans or projects were identified in the immediate vicinity that are considered to have had the potential to have any in-combination with the Development to result in significant effects on the integrity of European Sites.

It is therefore considered that the Development will or did result in any likely significant effects in-combination with any other plans or projects on the Castlemaine SPA and SAC or the Dingle SPA.

This statement is supported by:

I. The localised nature of the works;

II. The distances separating the Site from European Sites; and,

III. The mitigation measures that will be put in place.

Taking the above into account and given that the aforementioned projects would not result in any adverse effects on European sites, it can be concluded that the Development did not result in any in-combination contribution to adverse effects on the integrity of any European Sites.

8 RNIS CONCLUSIONS AND STATEMENT

A detailed assessment of the Development and associated available information, and the overall activities that will occur at the Site during both the Construction and Operational Phases has been carried out, and the potential for significant effects on European sites and qualifying features of interest within the zone of influence of the Site has been examined in detail.

As detailed in Section 4, the Stage 1 AA Screening conclusion states that the boundaries of seven designated sites, five SAC and two SPA, were screened out. It can be concluded that the Development will not, either alone or in combination with other plans or projects, be likely to have significant effects on these European sites.

However, a hydrological connection was identified between Castlemaine SPA and SAC, as well as the Site being located within the Dingle Peninsula SPA. Therefore, these three Site European sites were taken forward for further detailed consideration.

Precautionary mitigation measures are detailed within this rNIS, which will ensure that any effects on the Castlemaine SPA and SAC and Dingle Peninsula SPA or any other European site, having regard to their conservation objectives, will be avoided during all phases of the Development, such that there will be no adverse effects on the integrity of any European sites.

Following an examination, analysis and evaluation of the relevant information, including the nature of the potential effects from the Development and all associated works, it has been objectively concluded that with the implementation of the proposed mitigation measures, the Development did not or will not, either alone or in combination with other plans or projects, adversely affect the integrity or conservation status of any of the qualifying interests of the SPA and SAC and Dingle Peninsula SPA or any other European site in light of best scientific knowledge. This conclusion is reached on the basis of the best scientific knowledge, and there is no reasonable scientific doubt as to the absence of adverse effects on site integrity.

Accordingly, progression to Stage 3 of the Appropriate Assessment process (i.e. Assessment of Alternatives Solutions) is not considered necessary.

9 REFERENCES

[1] Governement of Ireland, *S.I. No 600/2001 Planning and Development Regulations 2001,* Dublin: Government of Ireland, 2001.

[2] OPR, “Appropriate Assessment Screening for Development Management,” 2021.

[3] European Commision, “Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC,” Brussels, 2021.

[4] CIEEM, “Guidelines for Ecological Impact Assessment in the UK and Ireland (Terrestrial, Freshwater, Coastal and Marine), Version 1.2,” 2022.

[5] EC, “Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC,” European Commision, 2018.

[6] DoEHLG, “Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities,” Department of the Environment, Heritage and Local Government, 2010.

[7] DoEHLG, “Appropriate Assessment under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10,” Department of Environment,Heritage and Local Government, 2010.

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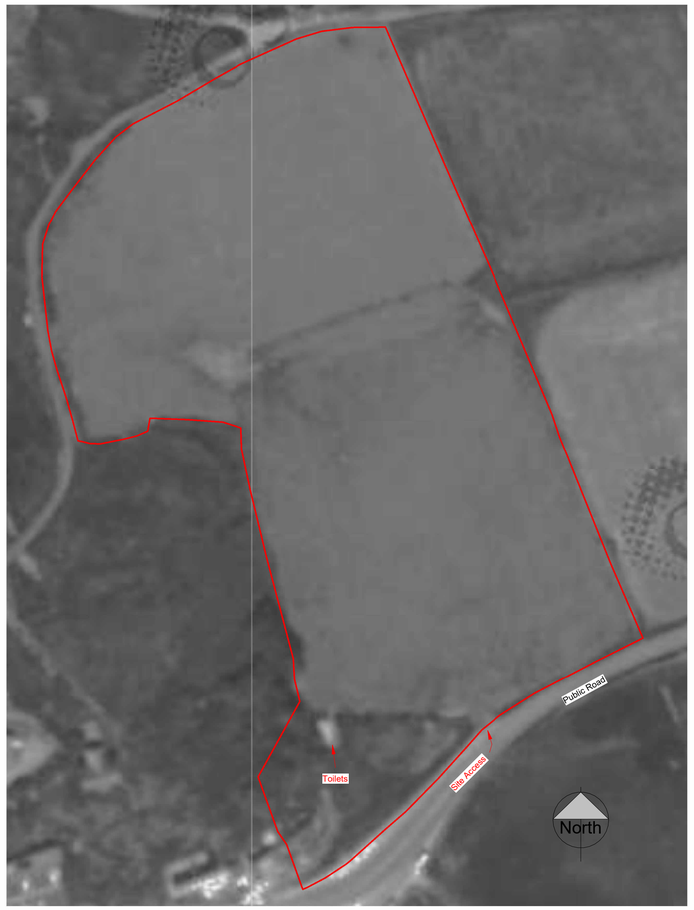
APPENDICES

APPENDIX A



1 **Aerial View 1995**
1 : 1000

2 **Aerial View 2009**
1 : 1000

3 **Aerial View 2012**
1 : 1000

Safety, Health and Welfare at work (Construction) Regulations 2013

Please refer to: **Guide for Homeowners**
getting construction work done safely

What do you have to do?
By law, you have to:
1. determine the competency of people doing paid construction work for you,
2. appoint project supervisors if required,
3. keep the safety file for the work as appropriate, and
4. let the Health and Safety Authority know if your project is going to take longer than 30 days or more than 500 person days (person days mean the number of days the work takes multiplied by the number of people doing the work).

See more at:
http://www.hsa.ie/eng/Your_Industry/Construction

PLEASE NOTE:
These drawings are for planning permission purposes only. Prior to construction work commencing all regulations must be complied with including building & safety regulations. Design drawings must be prepared to show compliance with building regulations.
If you are unsure or unaware of the regulations, consult or employ somebody qualified to ensure compliance.

Rev	Description	Date

CODE	SUITABILITY DESCRIPTION
STATUS	PURPOSE OF ISSUE

Drawn By: Seán Moriarty.
Moriarty Design & Construction.
An Nead, Ardrinane, Annascaul, Co Kerry

moriartydesign@eircom.net

PROJECT
Camping Site

PROJECT ADDRESS
Inch,
Annascaul.

TITLE
Aerial Views 1

CLIENT
Mark, George & Zara Hussain

DRAWN BY	CHECKED BY	DATE
Author	Checker	05/21/26

SCALE (@ A1)	PROJECT NUMBER
1 : 1000	26028

DRAWING NUMBER	REV
A102	

21/05/2026 11:18:56

1 Aerial View 2017
1 : 1000

2 Aerial View 2021
1 : 1000

3 Aerial View 2025
1 : 1000

Safety, Health and Welfare at work (Construction) Regulations 2013

Please refer to: **Guide for Homeowners**
getting construction work done safely

What do you have to do?
By law, you have to:
1. determine the competency of people doing paid construction work for you,
2. appoint project supervisors if required,
3. keep the safety file for the work as appropriate, and
4. let the Health and Safety Authority know if your project is going to take longer than 30 days or more than 500 person days (person days mean the number of days the work takes multiplied by the number of people doing the work).

See more at:
http://www.hsa.ie/eng/Your_Industry/Construction

PLEASE NOTE:
These drawings are for planning permission purposes only. Prior to construction work commencing all regulations must be complied with including building & safety regulations. Design drawings must be prepared to show compliance with building regulations.
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Rev	Description	Date

CODE	SUITABILITY DESCRIPTION
STATUS	PURPOSE OF ISSUE

Drawn By: Seán Moriarty.
Moriarty Design & Construction.
An Nead, Ardrinane, Annascaul, Co Kerry

moriartydesign@eircom.net

PROJECT
Camping Site

PROJECT ADDRESS
Inch,
Annascaul.

TITLE
Aerial Views 2

CLIENT
Mark, George & Zara Hussain

DRAWN BY	CHECKED BY	DATE
Author	Checker	05/21/26

SCALE (@ A1)	PROJECT NUMBER
1 : 1000	26028

DRAWING NUMBER	REV
A103	

21/05/2026 11:19:40

APPENDIX B

Invoice 1631

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

CUSTOMER:

Name	**AVA International**
Address	**Inch,Kerry**
	Ireland

DETAILS:

Invoice No	**1631**
Date	**15/12/2023**
Due date	**15/12/2023**
Vat No	**IE6812000E**

AMOUNT: **€250.00**

ITEM	DESCRIPTION	PRICE	QTY	VAT	NET
Service	22/11/2023 - De-sludging of septic tank and cleaning of grease traps.		1	13.50 %	220.26

Subtotal	*€220.26*
VAT	*€29.74*
TOTAL	*€250.00*
TOTAL DUE	**€250.00**

PAYMENT OPTIONS:

Name	*Thomas Barton*
Bank Name	*Current*
BIC	*AIBKIE2DXXX*
IBAN	*IE87AIBK93001608898090*
SortCode	*93-00-16*
Account	*08898090*
Address	*AIB,2 Lower castle St*

PAYMENT ADVICE

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

Customer	AVA International
Invoice No	1631
Amount Due	€250.00
Due date	15/12/2023
Amount enclosed	

Invoice 1631

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

CUSTOMER:

Name	**AVA International**
Address	**Inch,Kerry**
	Ireland

DETAILS:

Invoice No	**1631**
Date	**15/12/2023**
Due date	**15/12/2023**
Vat No	**IE6812000E**

AMOUNT: **€250.00**

ITEM	DESCRIPTION	PRICE	QTY	VAT	NET
Service	22/11/2023 - De-sludging of septic tank and cleaning of grease traps.		1	13.50 %	220.26

Subtotal	*€220.26*
VAT	*€29.74*
TOTAL	*€250.00*
TOTAL DUE	**€250.00**

PAYMENT OPTIONS:

Name	*Thomas Barton*
Bank Name	*Current*
BIC	*AIBKIE2DXXX*
IBAN	*IE87AIBK93001608898090*
SortCode	*93-00-16*
Account	*08898090*
Address	*AIB,2 Lower castle St*

PAYMENT ADVICE

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

Customer	AVA International
Invoice No	1631
Amount Due	€250.00
Due date	15/12/2023
Amount enclosed	

Invoice 149

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

CUSTOMER:

Name	**AVA International**
Address	**Inch,Kerry**
	Ireland

DETAILS:

Invoice No	**149**
Date	**29/08/2024**
Due date	**29/08/2024**
Vat No	**IE6812000E**

AMOUNT: **€431.30**

ITEM	DESCRIPTION	PRICE	QTY	VAT	NET
Service	call out to blocked drains-jetting of sewer lines and clearing of blockages at inch beach Camp site.		1	13.50 %	380.00

Subtotal	*€380.00*
VAT	*€51.30*
TOTAL	*€431.30*
TOTAL DUE	**€431.30**

PAYMENT OPTIONS:

Name	*Thomas Barton*
Bank Name	*Current*
BIC	*AIBKIE2DXXX*
IBAN	*IE87AIBK93001608898090*
SortCode	*93-00-16*
Account	*08898090*
Address	*AIB,2 Lower castle St*

PAYMENT ADVICE

Envirodrain
Ballyarkane
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Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

Customer	AVA International
Invoice No	149
Amount Due	€431.30
Due date	29/08/2024
Amount enclosed	

Invoice 141

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

CUSTOMER:

Name	**AVA International**
Address	**Inch,Kerry**
	Ireland

DETAILS:

Invoice No	**141**
Date	**07/08/2024**
Due date	**07/08/2024**
Vat No	**IE6812000E**

AMOUNT: **€261.05**

ITEM	DESCRIPTION	PRICE	QTY	VAT	NET
Service	De- sludging of septic tank and cleaning out of 2 grease traps at Inch Beach Camp site.	230.00	1	13.50 %	230.00

Subtotal	*€230.00*
VAT	*€31.05*
TOTAL	*€261.05*
TOTAL DUE	**€261.05**

PAYMENT OPTIONS:

Name	*Thomas Barton*
Bank Name	*Current*
BIC	*AIBKIE2DXXX*
IBAN	*IE87AIBK93001608898090*
SortCode	*93-00-16*
Account	*08898090*
Address	*AIB,2 Lower castle St*

PAYMENT ADVICE

Envirodrain
Ballyarkane
Keel
Castlemaine
Kerry
Ireland
087 9206208
info@envirodrain.ie
www.envirodrain.ie

Customer	AVA International
Invoice No	141
Amount Due	€261.05
Due date	07/08/2024
Amount enclosed	

Invoice 311

Envirodrain
Ballyfinnane.
Firies
Killarney
Kerry
V93 A5W7
Ireland
087 9206208
thomasbarton75@gmail.com
www.envirodrain.ie

CUSTOMER:

Name	**AVA-Inch Beach Camp Site.**
Address	**Inch ,Co Kerry**
	Ireland

DETAILS:

Invoice No	**311**
Date	**21/04/2025**
Due date	**21/04/2025**
Vat No	**IE6812000E**

AMOUNT: **€340.50**

ITEM	DESCRIPTION	PRICE	QTY	VAT	NET
Service	Call out to de-sludge septic tank at Inch Beach Camp Site. Sunday- 20/04/2025. Out of Hours Call.		1	13.50 %	300.00

Subtotal	*€300.00*
VAT	*€40.50*
TOTAL	*€340.50*
TOTAL DUE	**€340.50**

PAYMENT OPTIONS:

Name	*Envirodrain*
Bank Name	*BOI Current Account*
BIC	*BOFIIE2D*
IBAN	*iE80BOFI90583832444108*
SortCode	*905838*
Account	*32444108*
Address	*Castle St Tralee ,Co Kerry*

PAYMENT ADVICE

Envirodrain
Ballyfinnane.
Firies
Killarney
Kerry
V93 A5W7
Ireland
087 9206208
thomasbarton75@gmail.com
www.envirodrain.ie

Customer	AVA-Inch Beach Camp Site.
Invoice No	311
Amount Due	€340.50
Due date	21/04/2025
Amount enclosed	

APPENDIX C

Final Report of Ornithological Surveys, Inch, Co. Kerry
April 2025 to March 2026

Michael O'Clery
Goldcrest Environmental Services Ltd.

Curraghcoolenagh, Camp, Tralee, Co. Kerry V92 V5D7

Tel. (Mobile): 087 9711519
Email: michaeloclery@gmail.com

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5 **3. SITE LOCATION AND DESCRIPTION**

6 **4. METHODOLOGY**

7 **5. CONSTRAINTS**

8 **6. RESULTS**

12 **7. DISCUSSION**

14 **8. CONCLUSION**

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8 **Figure 2.** Totals of target species seen in each survey month, showing those Overflying (pale blue) and Terrestrial (dark red).

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8 **Table 1.** Dates and weather for each survey month, April 2025 to March 2026.

9 **Table 2.** Total of 33 individual target species recorded as Terrestrial, by month and species.

10 **Table 3.** Total of 13 individual target species recorded as Overflying the survey area below 5 m height, by month and species.

IMAGES

Cover. Aerial view of the proposed development site at Inch, Co. Kerry (image: M.O'Clery).

6 **Image 1.** Aerial view of the survey area, looking west. The existing camp and campervan site is in the foreground, slightly left of centre, Inch beach and the Dingle Peninsula on the left and upper left (image: M.O'Clery).
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11 **Image 3.** Oystercatcher (left) and Lesser Black-backed Gull, Inch (Photos: M.O'Clery).
12 **Image 4.** Female Kestrel (left) and Chough, Inch (Photos: M.O'Clery).

APPENDICES

16 **Appendix 1.** *Example of survey field sheet used during survey work.*
16 **Appendix 2.** *Latin names of bird species mentioned in the text.*

1. INTRODUCTION & SCOPE OF SERVICES

Goldcrest Environmental was appointed to carry out transect walkover bird surveys at the proposed Inch Camp and Campervan site at Inch (hereafter referred to as the proposed development site), located at the North end of Inch Beach, Co. Kerry (see Figure 1, below).

The transect surveys were to be undertaken monthly from April 2025 to March 2026 in order to capture both the full wintering and breeding bird survey periods.

Given the possible ecological sensitivity due to it being adjacent to the Castlemaine Harbour Special Area of Conservation [Site Code: 000343 https://www.npws.ie/protected-sites/sac/000343), the primary objectives of the monthly site walkover bird surveys were to:

1. In March 2025, to establish suitable transect routes for monthly ecological monitoring.
2. Assess and report monthly on the usage of lands, and overflying, by target bird species.
3. Identify key areas of ecological interest within the proposed development site.
4. Assess loss of habitat or possible collision risks to target species and, if necessary, offer mitigation measures.

2. RELEVANT QUALIFICATIONS OF PERSONNEL

Michal O'Clery of Goldcrest Environmental Services undertook all survey work.

Michael has been an active naturalist and birdwatcher for over 35 years and has worked professionally as a wildlife surveyor since 1999. He specialises in bird surveys, particularly raptors and owls, but has also been engaged in a wide variety of other surveys, such as Bird Atlas work, montane bird surveys, seabird surveys, and small mammal surveys. He has been professionally engaged in annual monitoring, tracking and ringing of Barn Owls in Ireland and has also undertaken large-scale surveys of Kestrel and Long-eared Owl as well as involvement in Curlew, Hen Harrier and Merlin surveys. He is the illustrator and co-author of four books on Irish birds, including the best-selling, *Complete Guide to the Birds of Ireland* (Dempsey & O'Clery, 2002) and *Finding Birds in Ireland: The Complete Guide* (Dempsey & O'Clery, 2014). A full CV is available upon request.

3. SITE LOCATION AND DESCRIPTION

The survey area comprises the proposed development site and key habitats in the immediate areas of the proposed development boundary, as per the Scottish Natural Heritage guidelines (SNH, 2017), and is shown in the figure below.

The site is located at the northern end of Inch Beach in Co. Kerry, at 52.14333, -9.98004. The site is bounded by improved grassland on the eastern and northern sides, rough scrub (mostly gorse) and residential properties on the western side, and on the southern side, the main R561 road from Castlemaine to Dingle. To the south of the road is the extensive reed, marsh and sand dune complex of Inch, part of the recently created Páirc Náisiúnta na Mara, Ciarraí (see https://www.nationalparks.ie/mara-ciarrai/). This is part of the large Castlemaine Harbour Special Area of Conservation, for details of which, see Link here.

The survey area comprised 0.11 square kilometres (8.92 hectares), and was on a south facing lower slopes of Ardroe mountain, with an altitude of between 5 m and 45 m altitude.

Image 1. Aerial view of the survey area, looking west. The existing camp and campervan site is in the foreground, slightly left of centre, Inch beach and the Dingle Peninsula on the left and upper left (image: M.O'Clery).

4. METHODOLOGY

Survey Guidance

This report and the transect bird surveys were undertaken using the following guidance:

· Scottish Natural Heritage (SNH) (2017) 'Recommended Bird Survey Methods to Inform Impact Assessments of Onshore Wind Farms'.
· Hardy, J., Crick, H., Wernham, C., Riley, H., Etheridge, B., Thompson, D. (2013). *Raptors: A Field Guide for Surveys and Monitoring.*
· Gilbert, G Stanbury A., Lewis, L. (2021). Birds of Conservation Concern in Ireland 2020-2026. *Irish Birds* 9: 523-544.

Survey Methodology

Transect surveys were undertaken at the proposed development site. A transect survey follows a defined linear route through a specific area to achieve maximum coverage of suitable habitat.

A single transect route was proposed for the transect survey on the proposed development site. This transect visually covered all of the survey area (Figure 1, below), both the lower and upper sections of the small area of the proposed development, and were on public roads and tracks. The transect surveys were walked at a slow walking speed, and due to the small area, was walked twice during each survey, the full duration therefore approximately 90 minutes for each survey visit. Notes on aural and visual registrations of target species (all raptors, wildfowl, waterbirds, waders, gulls, herons) were recorded during field surveys. Chough was also included as a target species based on the presence of adjacent areas of the Dingle Peninsula Special Protection Area, which includes Chough as a Qualifying Interest (See the NPWS website here for more detail).

Visual registrations were recorded with the aid of binoculars (e.g., 8 x 42) and, where necessary, with the aid of a telescope (e.g., 20-45 x 60 scope).

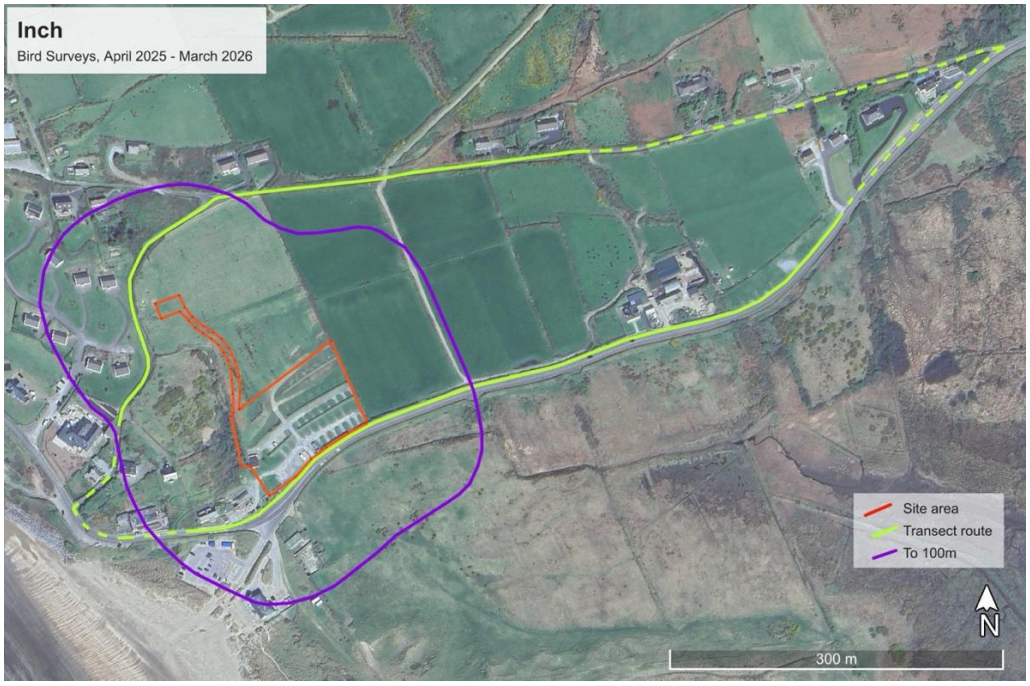

Figure 1. Proposed development area (red), 100m zone around proposed development area (purple) and Transect route (lime green).

Target species were broken into two groups, those perched or feeding on the ground within the study area and to 100 m surrounding the survey area (recorded as 'Terrestrial'), and those overflying the site within 100 m of the survey area (recorded as 'Overflying'). To distinguish those target species flying close to the ground, each overflying species was also designated as having flown below or above a 5m height band.

Image 2. Aerial view of the current camp and caravan site at Inch (Photo: M.O'Clery).

5. CONSTRAINTS

There were no significant constraints encountered during survey work. The topography of the survey area immediately adjacent to the proposed development was open, with unhindered sight lines, and no tall obstructions or large areas of densely vegetated habitats. Transect routes were on public roads and tracks.

6. RESULTS

Transect Survey Results

The twelve monthly surveys were carried out on the following dates and in the following weather conditions.

Date	Wind Beaufort	Weather	Visibility	Temp. OC	Disturbance
21st April 2025	W - 4	Light showers, breezy, partly cloudy	V. good	11	None
18th May 2025	E - 3	Sunny, light breeze, dry, warm	V. good	20	Slight
5th June 2025	W - 4	Cloudy, breezy, dry	V. good	12	None
24th July 2026	W 1-2	Calm, sunny, dry	V. good	19	None
2nd August 2026	W 4	Dry, sunny spells, breezy	V. good	18	None
10th September 2026	WNW 4-5	Occasional showers, breezy, cloudy	V. good	20	None
12th October 2025	NW 1	Sunny, calm, dry	V.good	11	None
6th November 2025	SW - 2	Slight mist, light breeze, dry	Moderate, later good	9	None
3rd December 2025	S-SW 4	Cloudy, dry, breezy	V.good	7	None
7th January 2026	WNW - 3	Rain clearing, light breeze	Good	9	None
2nd February 2026	ESE - 6	Dry, windy, cloudy	V.good	7	None
3rd March 2026	E - 3	Mainly sunny, light breeze, dry	V.good	9	None

Table 1. Dates and weather for each survey month, April 2025 to March 2026.

Over the course of the year-long survey, the monthly surveys detected a total of 163 individuals of 11 target species. Monthly totals of individual target species seen during each survey visit within the survey area varied from a low of 4 (in August 2025) to a high of 28 (in December 2026), and the average number of individuals seen in each survey month was 13.58.

The totals of target species seen in each survey month are shown in the Figure below.

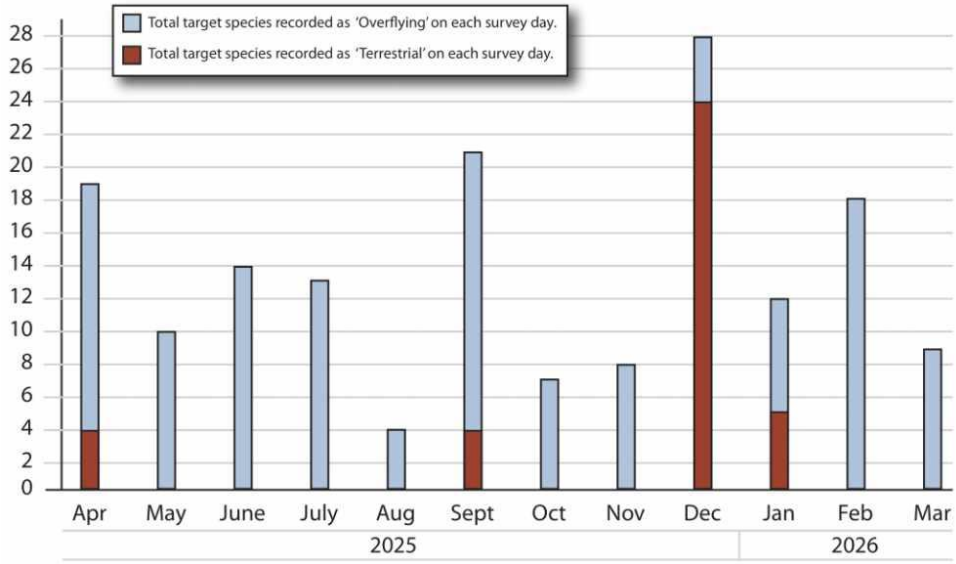

Figure 2. Totals of target species seen in each survey month, showing those Overflying (pale blue) and Terrestrial (dark red).

Of the 11 target species recorded during the survey, Common Gull was the commonest species seen over the 12 surveys with 56 individuals recorded, followed by Lesser Black-backed Gull (27), Oystercatcher and Herring Gull (each with 22) and Cormorant (17). Only single figures were recorded of the remaining six species, Black-headed Gull (6), Great Black-backed Gull and Kestrel (each with 4), Curlew and Little Egret (each with 3) and Grey Heron (2).

The totals by target species seen in each survey month are shown in the figure below.

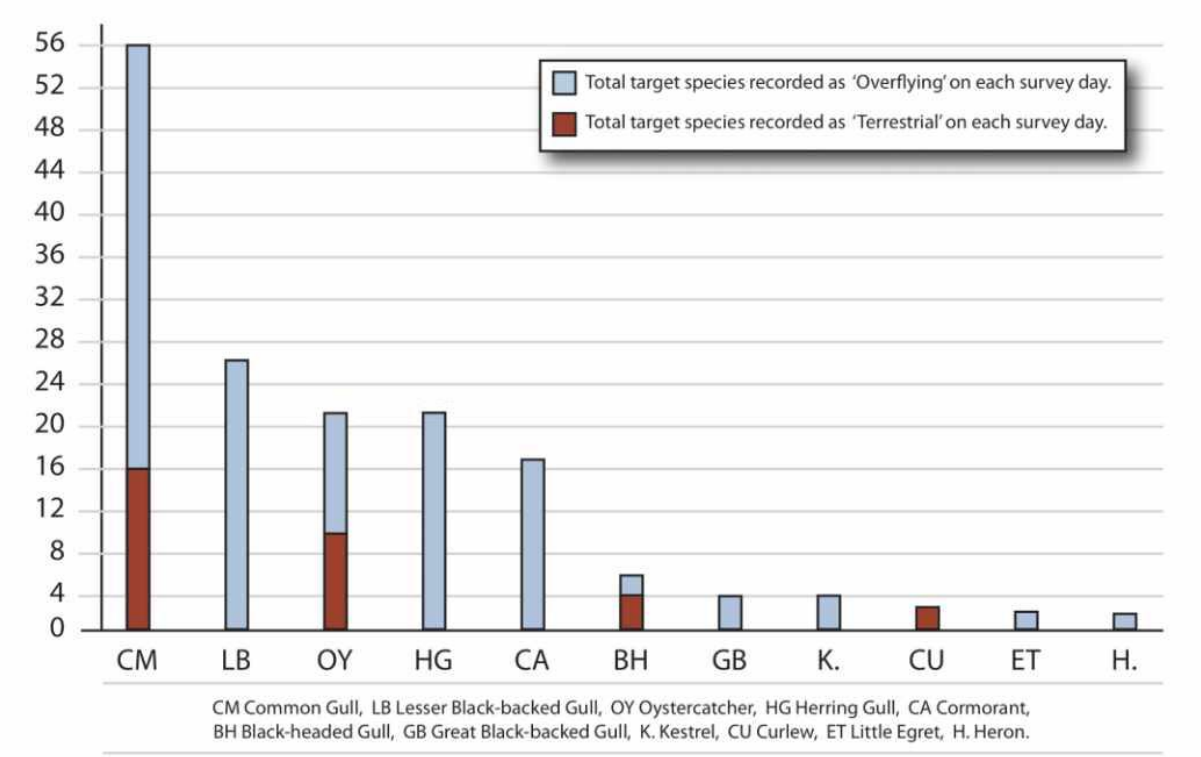

Figure 3. Total numbers of individuals of the 11 target species recorded during the survey, and showing those Overflying the survey area (pale blue) and Terrestrial (dark red).

Of the 163 individual target species, 33 (20.24%) were recorded as Terrestrial, i.e. feeding or roosting on the ground within the study area (mostly during the December survey with 24 of the 33 Terrestrial records). The species recorded as Terrestrial were Common Gull (15), Oystercatcher (10), Black-headed Gull (4) and Curlew (3) and are shown in the Table below.

	Total of 33 individuals recorded as Terrestrial				
Species	**April 2025 Survey**	**September 2025 Survey**	**December 2025 Survey**	**January 2026 Survey**	**TOTAL**
Common Gull	-	2	11	3	**16**
Oystercatcher	2	-	8	-	**10**
Black-headed Gull	-	-	2	2	**4**
Curlew	-	-	3	-	**3**

Table 2. Total of 33 individual target species recorded as Terrestrial, by month and species.

The location on the ground of these 33 individual Terrestrial birds were mapped, and are shown in the Figure below.

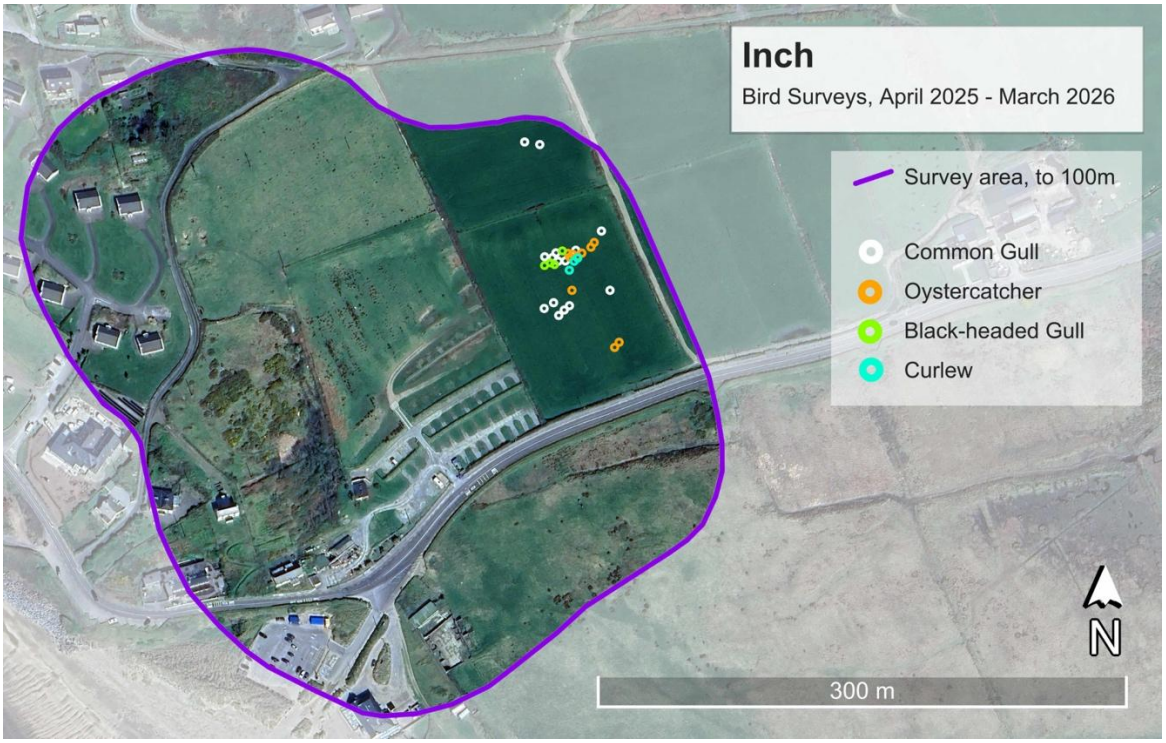

Figure 4. Location of individuals of 4 target species which were recorded as Terrestrial during the survey.

Of the 33 Terrestrial records recorded within the survey area, all but 2 were in the improved grassland field immediately to the east of the current camp site. The remaining 2 were recorded foraging on the improved grassland field immediately to the north.

Of the 130 Overflying target species, a total of 117 (90%) was recorded as flying at heights of greater than 5 m, and 13 (10.0%) were recorded in the <5 m flight band, 8 Common Gulls, 3 Lesser Black-backed Gulls and 2 Herring Gulls. Target species recorded flying over the survey area below the 5 m height band were recorded in only four of the twelve survey visits. These are shown in the Table below.

	Total of 13 individuals recorded as Overflying, below 5m				
Species	**April 2025 Survey**	**May 2025 Survey**	**July 2025 Survey**	**January 2026 Survey**	**TOTAL**
Common Gull	1	-	5	2	**8**
Lesser Black-backed Gull	-	3	-	-	**3**
Herring Gull	2	-	-	-	**2**

Table 3. Total of 13 individual target species recorded as Overflying the survey area below 5 m height, by survey month and species.

The flightlines of the 13 individuals recorded flying below the 5 m height band are shown in the Figure below.

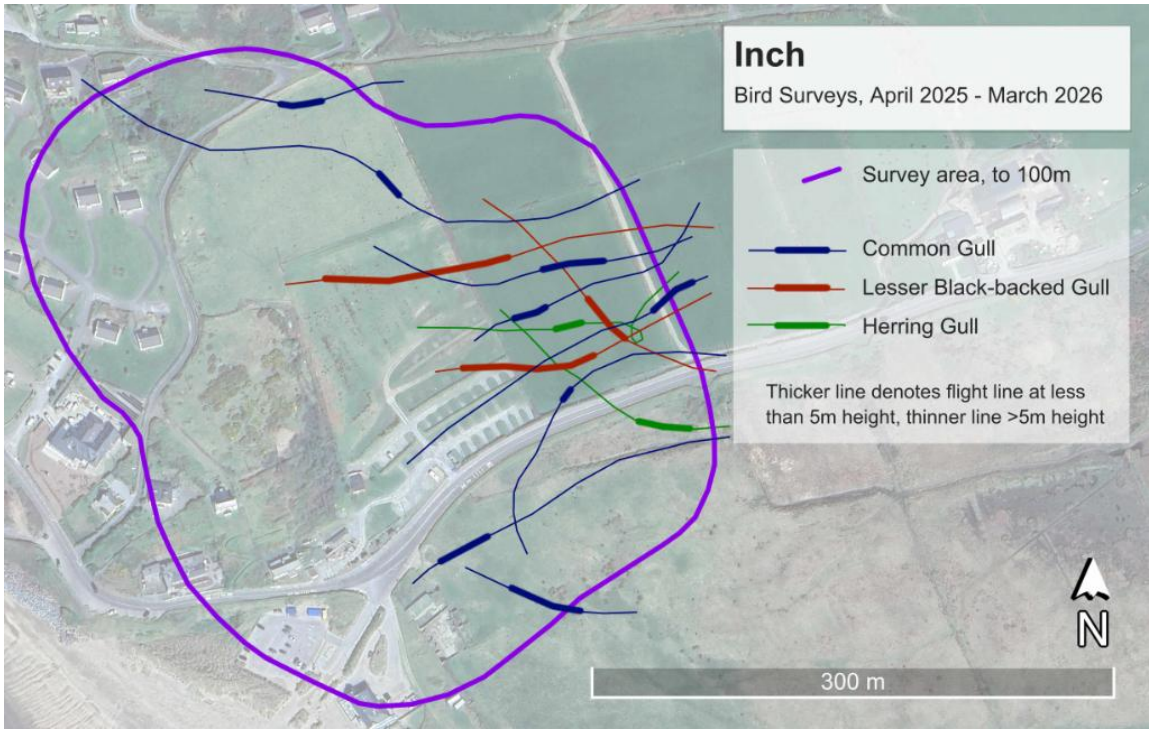

Figure 5. Flightlines of 13 individual target species which were below the 5 m height band. (thicker part of line). The thinner line shows where the flightline was above 5 m height.

All 13 individuals flying below 5 m height were gulls – Common Gull (8), Lesser Black-backed Gull (3) and Herring Gull (2). As can be seen, none of the sections of flightlines under 5 m height were longer than approximately 100 m, some were <20m, and virtually all remained in the under-5 m flight band for only a few seconds each, before resuming in flight bands of greater than 5 m. Most were travelling on an east-west axis, largely following the contours of the fields and slopes in the study area.

Image 3. Oystercatcher (left) and Lesser Black-backed Gull, Inch (Photos: M.O'Clery).

Raptors and other species

4 Kestrels were recorded during the survey, 2 adult males and two adult females. All 4 overflew the survey area at >5 m height, and none were seen to forage or hunt within the survey area (though 3 did so outside the survey area). Buzzard has been regularly recorded outside the survey area (personal observation), but none were recorded within the survey area throughout the survey period.

Chough are frequently recorded in the wider area, foraging on the nearby coastal cliff tops and extensive sand dunes behind Inch Beach. Several were noted just outside the survey area, but were not recorded within the survey area throughout the survey period.

Image 4. Female Kestrel (left) and Chough, Inch (Photos: M.O'Clery).

7. DISCUSSION

Target species recorded

The most common of the 163 target species recorded during the survey was Common Gull (56 individuals), followed by Lesser Black-backed Gull (26), Oystercatcher (21), Herring Gull (21), Cormorant (17), Black-headed Gull (6), Great Black-backed Gull (4), Kestrel (4), Curlew (3), Little Egret (3) and Grey Heron (2). This would be considered an accurate representation of the bird diversity in the general area. However, given that the 12 monthly surveys of approximately 90 minutes duration each (1080 minutes, or 18 hours total), the numbers in absolute terms are relatively low for a coastal site adjacent to a large wetland. There were for example, no Mallard, Teal, Brent Geese or Wigeon recorded overflying or foraging on or over the survey area, even though there are wintering flocks of many hundreds of each of these overwintering in the adjacent Castlemaine Harbour area. Similarly, Redshank, Greenshank and Snipe are commonly encountered within 100m to the south of the survey area in winter, yet none were recorded as overflying or foraging in the survey area.

Seasonal trends

The peak count of all target species was in December (28), and the next two highest counts being in September (21) and April (19), while the three lowest counts were August (4), October (7) and November (8), showing that there was no strong seasonal trend as to when birds overflew or foraged within the survey area. The number of target species, particularly wildfowl, waterbirds and gulls, would be expected to be at their lowest at the height of the breeding season (May to July) and highest in winter, as reflected by IWeBS counts at Castlemaine Harbour and Inch (see eg., BirdWatch Ireland data here), and more generally the Bird Atlas results (see BTO Atlas results here).

Overflying target species and collision risks

Of the 130 Overflying target species recorded during the survey, only 13 (10.0%) were recorded in the <5 m flight band, all gulls: 8 Common Gulls; 3 Lesser Black-backed Gulls and 2 Herring Gulls. As can be seen in Figure 5, the flight of individual birds were generally in an east west axis, following the general contours of the sloping survey area. The time spent flying below the 5 m height band was often very brief, as birds swooped low across fields and then regained height to >5 m height.

The majority (90%) of target species flying above the 5 m height band were also flying in a general east west axis, generally at heights of 15-50 m, though some, particularly gulls and Cormorant, often

overflew the survey area much higher, from 50 to 200m height. The general behaviour of all the target species overflying the survey area (and the relatively few that foraged within the survey area) would indicate that most are 'commuting' between other feeding and roosting sites.

With the proposed development, one of the issues to be assessed is that of collision risk. While there is virtually no literature on bird collisions with camp sites and campervan sites specifically, there is a considerable body of research into power lines and wind turbines and bird collisions (BirdLife International publication (Council of Europe, 2012) Link here and Link here.) However, in the context of potential collision hazard on a camp and campervan site, a more reasonable comparison might be to compare collision risks with solar farms (similar in height, no rotating turbine blades, high visibility to birds, etc.). These have proven to be of Low Risk of Collision to birds (see eg, Oglęcki *et al.* link here), apart from some rare incidences of wildfowl, where the reflectivity of the solar panels resembles water. However, it would be reasonable to assume that such an issue would not arise in the case of a camp and campervan site, therefore the risk of collision would be assessed as Very Low.

Terrestrial target species

The majority (24 of 33, or 72.7%) of individual target species recorded as Terrestrial throughout the survey period occurred during the December 2025 survey, and indeed, only four of the twelve monthly surveys – April, September, December 2025 and January 2026 – recorded birds utilising the survey area for foraging. During the remaining 8 surveys, target species were only seen overflying the site and not recorded as 'Terrestrial'.

Of the 33 Terrestrial target species recorded, 31 were foraging on the improved grassland field immediately to the east of the camp and caravan site, and the remaining two on the improved grassland filed to the north of this. No Terrestrial birds were recorded anywhere else within the survey area. The infrequency of the incidence of foraging birds within the survey area was notable, and as with the Overflying birds recorded, there was no strong seasonal trend, though the December counts were much the highest, perhaps indicating a slight tendency for foraging birds to occur during the winter months (when, as mentioned above, the numbers of wintering target species is at its highest).

Raptors and others

Four Kestrels were recorded as Overflying the site during the year-long survey, of two adult males and two adult females. All were flying in the >5 m height bands and all were flying over the upper (northern) section of the study area. A pair of Kestrels have nested in recent years on the coastal cliffs about 1.5 km to the west of the survey area (personal observations), and with typically a territory of many square kilometres, might be expected to hunt over the survey area occasionally, though this was not recorded during the survey.

While Chough were regularly recorded close to the survey area, particularly along and above the coastal cliffs, none were seen to overfly or forage within the study area.

Buzzard, Merlin, Peregrine Falcon and Hen Harrier have all been recorded previously in the wider Inch area (per Dingle Peninsula Bird Reports, Bird Atlases results, etc.) but none were recorded during the survey.

8. CONCLUSION

General observations show that, in this year-long survey, the area of the proposed development is of low importance for foraging birds, with relatively few observation of birds feeding on the ground, and in only 4 of the 12 months of the survey. Most of the foraging birds were recorded in one survey, in December 2025, and almost all in the single field to the east of the proposed development site. Thus while birds do occasionally utilise this field for foraging, their occurrence is irregular and not strongly linked to a particular time of year or season.

Target species overflying the area are considered to be 'commuting' to and from other feeding, nesting, or loitering areas and not landing. Of the few that overflew the site lower than 5 m, most flightlines within that flight band were brief, and in a general east west axis, again showing that birds were 'commuting' to other feeding or foraging areas.

It is reasonable to conclude therefore, that further expansion of the camp and caravan site may result in a slight loss of foraging for a small number of birds, and that collision risks for overflying birds would be assessed as Very Low.

Given the possible ecological sensitivity due to the proposed development site being adjacent to the Castlemaine Harbour SAC, this survey found that the occurrence of target species within the survey area was relatively low – 163 individual birds over 18 hours of survey work – and there would be minimal loss of suitable foraging habitat and minimal collision risk to target species.

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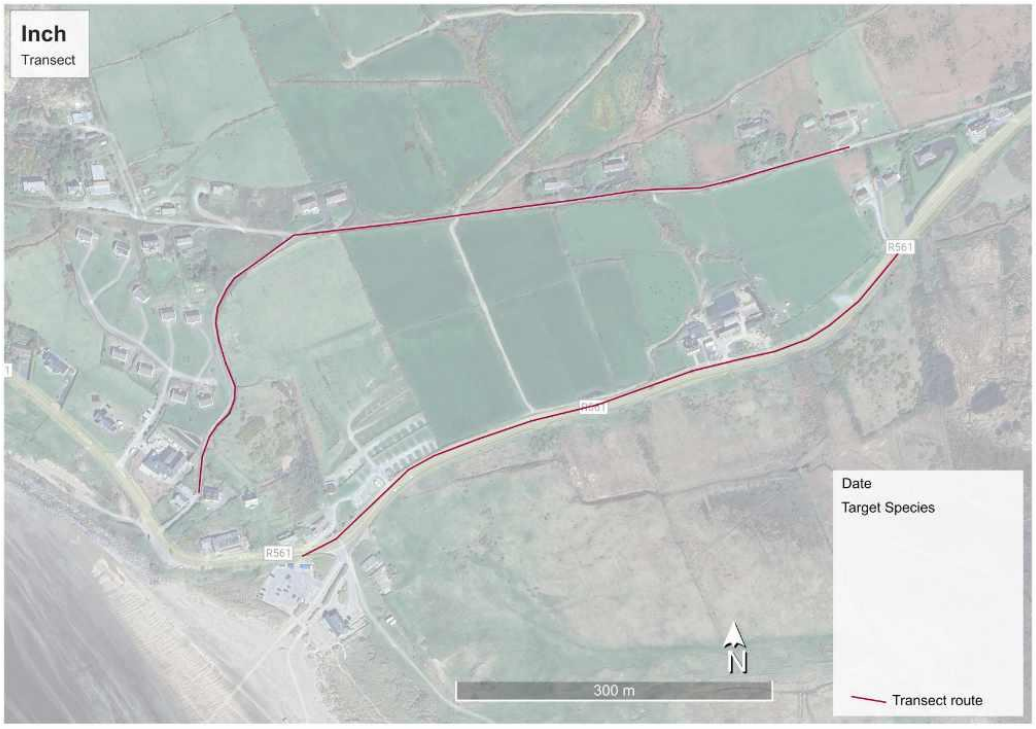
9. APPENDICES

Appendix 1.



Appendix 1. Example of Survey sheet used during fieldwork.

Appendix 2.

Latin names of bird species used in this Report

Mallard *Anas platyrhynchos*
(Eurasian) Wigeon Mareca penelope
(Eurasian) Teal *Anas crecca*
(Light-bellied) Brent Goose *Branta Bernicla*
Grey Heron *Ardea cinerea*
Great Cormorant *Phalacrocorax carbo*
Buzzard *Buteo buteo*
Kestrel *Falco tinnunculus*
Merlin *Falco columbarius*
Peregrine Falcon *Falco peregrinus*
Hen Harrier *Circus cyaneus*
(Eurasian) Oystercatcher *Haematopus ostralegus*
(Eurasian) Curlew *Numenius arquata*
Black-headed Gull *Larus ridibundus*
Common Gull *Larus canus*
Lesser Black-backed Gull *Larus fuscus*
(European) Herring Gull *Larus argentatus*
(Red-billed) Chough *Pyrrhocorax pyrrhocorax*

APPENDIX D

July 2026.

Ballyfinnane, Firies
Co. Kerry
087-9206208
Vat No IE6812000E
Registered & Insured

Site Details:
Inch Beach Camp Site
Inch Co Kerry

Further to a recent visit to inch Beach Camp site where we carried out a camera inspection of the sewer pipes.

We began at the chemical toilet disposal point and surveyed the line from there to the adjoining manholes and out to the septic tank further down the site.

On inspection we noted that the line is in good condition with no visible defects.
Upon inspection of the septic tank we found that the water levels in the tank were normal, just under the inlet and outlet Pipe.

If you have any queries on any of the above don't hesitate to contact me.

Thomas Barton
Envirodrain
087 9206208