

APPENDIX 5



Bat Survey Report

Skerries Mills, Skerries, Co.
Dublin.

November 2021

Prepared for:
ABN Consultants on behalf of Fingal County Council

Comhairle Contae
Fhine Gall
Fingal County
Council



O'DONNELL 
ENVIRONMENTAL

Summary

Project: Red Barn Redevelopment, Skerries Mills, Skerries, Co. Dublin.

Statement of Competence: O'Donnell Environmental is an independent consultancy established in 2019. O'Donnell Environmental is a Chartered Institute of Ecology and Environmental Management (CIEEM) 'Registered Practice' which demonstrates our commitment to high professional standards, accountability and the delivery of the best outcomes for biodiversity and our clients.

Tom O'Donnell is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has over 10 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads, cycleways and residential developments. Tom is licensed by NPWS for roost disturbance (Ref: DER/BAT 2021-04) and to capture bats (C181/2020).

Project Reference: 2021/41			
Document Rev. No.	Status	Contributor	Date
A	Draft Issue	TO'D, DP	08.10.2021
1	Final Issue	TO'D	01.11.2021

Table of Contents

1	Introduction.....	1
1.1	Legal Status of Bats.....	1
1.2	Description of Project.....	1
1.2.1	Site Description.....	2
2	Methodology.....	4
2.1.1	Designated Conservation Sites.....	4
2.2	Visual Roost Survey.....	4
2.3	Bat Activity Surveys.....	5
2.4	Data Analysis.....	5
2.5	Evaluation & Impact Assessment.....	5
2.6	Survey limitations.....	5
3	Results.....	7
3.1	Desktop Survey.....	7
3.1.1	Sites of International Importance.....	7
3.1.2	Sites of National Importance.....	7
3.2	Data Search.....	10
3.3	Visual Bat Roost Survey.....	10
3.4	Bat Activity Survey.....	11
3.5	Summary of Results.....	12
4	Discussion.....	13
4.1	Recommendations.....	13
5	References.....	14

Appendices

Appendix A – Photographic Record

Appendix B - Proposed Layout

1 Introduction

O'Donnell Environmental were commissioned by ABN Consultants on behalf of Fingal County Council to prepare an Bat Survey Report in relation to a proposed redevelopment of the Red Barn building at Skerries Mills, Skerries, Co. Dublin. Appropriate Assessment (AA) Screening and Environmental Impact Assessment (EIA) Screening have also been prepared by O'Donnell Environmental in relation to the proposed works.

The aims of this bat survey report were to determine the following:

- To assess and evaluate the likely importance of the existing structures to bats.
- The diversity and relative abundance of bats present within the study area and its immediate environs.

The site of the proposed works is within Skerries Mills, Skerries, Co. Dublin. A site location map is presented in **Figure 1.1**.

1.1 LEGAL STATUS OF BATS

All bat species and their roosting sites are strictly protected under both national and international law. The purpose of this legislation is to maintain and restore bat populations within their natural range. Where human activities have the potential to compromise bat populations, measures are required to be put in place to avoid impacts or compensate and mitigate for those impacts. A grant of planning permission does not constitute a licence or permit to disturb bats or interfere with their breeding or resting places.

The key legislation which provides protection to bats is as follows:

- Wildlife Act (1976) and subsequent amendments which makes it unlawful to intentionally disturb, injure or kill a bat or disturb its resting place without a licence to derogate from Regulation 23 of the Habitats Regulations 1997, issued by NPWS.
- The EU Habitats Directive (which has been transposed into Irish law with the European Communities (Birds and Natural Habitats) Regulations 2011) which seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of populations be undertaken. All Irish bat species are listed in Annex IV, while Annex II provides additional protection for the Lesser Horseshoe Bat.

1.2 DESCRIPTION OF PROJECT

Fingal County Council intends to redevelop the Red Barn building at Skerries Mills. The proposed work comprises of the demolition of the existing metal clad Red Barn building, apart from a section of the wall that runs along the boundary adjacent to the outlet stream from the existing mill. The latter structure will be retained to achieve separation of the working area and adjoining watercourse.

The Red Barn building will be replaced through the construction of a new structure approximately within the same building footprint. This new building will contain a multi-purpose assembly area within the new structure in addition to a kitchen, toilet, storage area, and lobby along with ancillary elements including an external deck and external lighting.

Construction works will be carried out according to the best practice standards detailed in the accompanying 'Outline Construction and Environmental Management Plan' (oCEMP) (ABN, 2021).

Elements of the proposed works which have potential to impact on bats include the following:

- Demolition/renovation of red barn building resulting in the loss of possible roosting opportunities.
- Removal of potential foraging habitat.

1.2.1 Site Description

The study site measures 0.08ha and occurs in a semi-urban location in Skerries, Co. Dublin. The habitats present at the Red Mills site are habitats of low ecological value which are commonly associated with urban environments. The study site consists of the following habitats which are categorised according to Fossitt (2000):

- 'Buildings and Artificial Surfaces' (BL3),
- 'Amenity Grassland' (GA2)
- 'Treelines' (WL2) which immediately adjoining the study site.

No Annex I habitats listed under the EU Habitats Directive are present within the study site. No botanical species protected under the Flora (Protection) Order 2015, listed in Annex II or IV of the EU Habitats Directive (92/43/EEC), or Red listed in Ireland were recorded. All species recorded during the ecological surveys are considered common for similar habitats in the general area. Two alien invasive plant species were recorded during the site visits, namely Himalayan Balsam (*Impatiens glandulifera*) and Chilean Rhubarb (*Gunnera tinctoria*). These plants are often found growing near watercourses throughout Ireland and in the study area they are growing adjacent to the Mill Stream, a watercourse running through the site.



Figure 1.1
Study Site Location

Project:
Red Barn Redevelopment, Skerries Mills.

Prepared for:
ABN on behalf of Fingal County Council.

Tom O'Donnell CEnv MCIEEM
D: 08/10/2021

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Legend

- Study Site
- Skerries Mills

2 Methodology

The purpose of this desk study was to gather existing information about the bat fauna of the site and surrounding area, which included a review of NPWS records. Bat Conservation Ireland was consulted for existing data on roosts present within 1km of the study area on 7th September 2021.

2.1.1 Designated Conservation Sites

Designated nature conservation sites within the wider hinterland of the study site were identified through a desktop review. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) form part of a European Conservation network known as Natura 2000 sites. SACs are designated under the EU Habitats Directive¹ while SPAs designated under the EU Birds Directive.

2.2 VISUAL ROOST SURVEY

Daytime visual assessments were carried out by Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM and Donnachadh Powell BSc (Hons) to identify any bat roosting potential which may exist associated with the target structure.

A detailed visual assessment was carried out on 20th September 2021 and followed guidance set out in Collins (2016). The survey was non-destructive, and relevant Potential Roost Features (PRFs) were visually inspected to identify any evidence of bat roosting. Signs of bat use include bat droppings, feeding remains, potential bat access points identified by characteristic staining and scratches, noise made by bats etc.

Photographs of the study area are shown in **Appendix A**.

Potential Roost Features (PRFs) are described according to the scheme outlined in **Table 2.1**, below.

Table 2.1. Scheme for describing the potential suitability of features for bats.

Suitability	Description
Negligible	Negligible features which are likely to be used by roosting bats.
Low	A feature with one or more potential roost sites that could be used by individual bats opportunistically. Potential roost sites which do not provide appropriate conditions and / or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to characteristics and surrounding habitat but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

After 'Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition)', Collins (2016).

2.3 BAT ACTIVITY SURVEYS

Emergence (dusk) and re-entry (dawn) surveys were carried out to identify any evidence of bat roosting within the Red Barn structure and the adjoining Skerries Mills buildings which immediately adjoining the study site.

An emergence (dusk) survey was carried out on 20th September 2021 following Collins (2016) to characterise bat activity in the area and to seek to identify any bat access or egress. The survey was carried out by two surveyors, Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM and Donnachadh Powell BSc (Hons). One surveyor (TO'D) was positioned at the northwest corner of the Red Barn building and the other (DP) was positioned at the southeast corner of the building and full coverage of the building was achieved. The survey commenced at 19:10 and continued until 21:00. Sunset in Skerries on the 20th September 2021 was 19:27.

A re-entry (dawn) survey was carried out on 21st September 2021. The survey was carried out by two surveyors, Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM and Donnachadh Powell BSc (Hons). One surveyor (TO'D) was positioned at the northwest corner of the Red Barn building and the other (DP) was positioned at the southeast corner of the building and full coverage of the building was achieved. The survey commenced at 06:00 and continued until 07:10. Sunrise in Skerries on 21st September 2021 was at 07:08.

A Guide IR Pro thermal imaging camera was utilised as an aid to visual assessment during the surveys (see **Plate 3.1**).

The surveys were carried out during suitable weather conditions. Wind speed was estimated at F0 to 1 for both surveys. Temperature was 17°C during the emergence survey and 13°C during the dawn survey. Visibility was good and no precipitation occurred during the surveys. Recordings were made on handheld Echo Touch Meter Pro 2 full spectrum recorders.

2.4 DATA ANALYSIS

Bat sonograms were analysed using the Kaleidoscope Pro Analysis software and identifications were manually verified following Russ (2012).

2.5 EVALUATION & IMPACT ASSESSMENT

Evaluation of ecological features follows the NRA (now TII) publication 'Guidelines for Assessment of Ecological Impacts of National Roads Schemes' (2009). Impact assessment follows 'Guidelines on The Information to be Contained in Environmental Impact Assessment Reports' published by the EPA (2017). Reporting follows Chartered Institute of Ecology and Environmental Management (2018) 'Guidelines for Ecological Impact Assessment in the UK and Ireland - Terrestrial, Freshwater, Coastal and Marine'.

2.6 SURVEY LIMITATIONS

The survey occurred in September at which time bats are generally active at night and maternity roosts have disbanded. The survey occurred in suitable weather conditions and bats were active.

Full access to the interior and exterior of the red barn building and associated areas within Skerries Mills was provided by the Client.

3 Results

The proposed site occurs in a semi-urban location in Skerries, Co. Dublin. The area contains some limited foraging habitat for bats and is subject to high levels of light pollution. The availability of roosting opportunities is considered to be low.

3.1 DESKTOP SURVEY

3.1.1 Sites of International Importance

Special Areas of Conservation (SAC) and Special Protection Areas for birds (SPA) are those sites that are deemed to be of European (i.e., international) importance. They form part of a network of sites to be designated across Europe in order to protect biodiversity within the community, known as Natura 2000 sites.

The study area is not located within such a site. Ten Natura 2000 sites are located within 15km of the study area (**Table 3.1**). SPA sites are designated for the conservation of birds, and are not relevant to the current bat report. SACs are designated for certain habitats (Annex 1) and species (Annex 2). Of the Irish bat species, only Lesser Horseshoe Bat are listed in Annex 2 of the EU Habitats Directive and the study site occurs outside the known range of this species. No SACs are relevant to the current bat survey report.

Table 3.1 - Natura 2000 sites within 15km.

Site Name	Site Code	Distance (km)
Malahide Estuary SPA	004025	11.3
River Nanny Estuary and Shore SPA	004158	11
Malahide Estuary SPA	004025	10.7
Lambay Island SPA	004069	9.6
Rogerstown Estuary SPA	004015	6.3
Rockabill SPA	004014	3.3
The Skerries Islands SPA	004122	0.9
Lambay Island SAC	000204	10
Rogerstown Estuary SAC	000208	6.3
Rockabill to Dalkey Island SAC	003000	2.8

3.1.2 Sites of National Importance

At a national level, the basic unit of conservation is the Natural Heritage Area or proposed National Heritage Area (NHA/pNHA). NHAs are designated to protect habitats, flora, fauna and geological sites of national importance.

There is one NHA within 5km of the proposed site, namely The Skerries Islands NHA (001218) which is located approximately 1km east of the study area. Bats are not described amongst the

site's reasons for designation. Skerries Islands are also designated as a Natura 2000 site and is discussed above. One pNHA occurs within 5km of the proposed site, namely Loughshinny Coast pNHA (002000).

No relevant nationally designated site includes bats as a reason for selection.

The internationally and nationally designated sites that are relevant to the proposed project are shown in **Figure 3.1**.

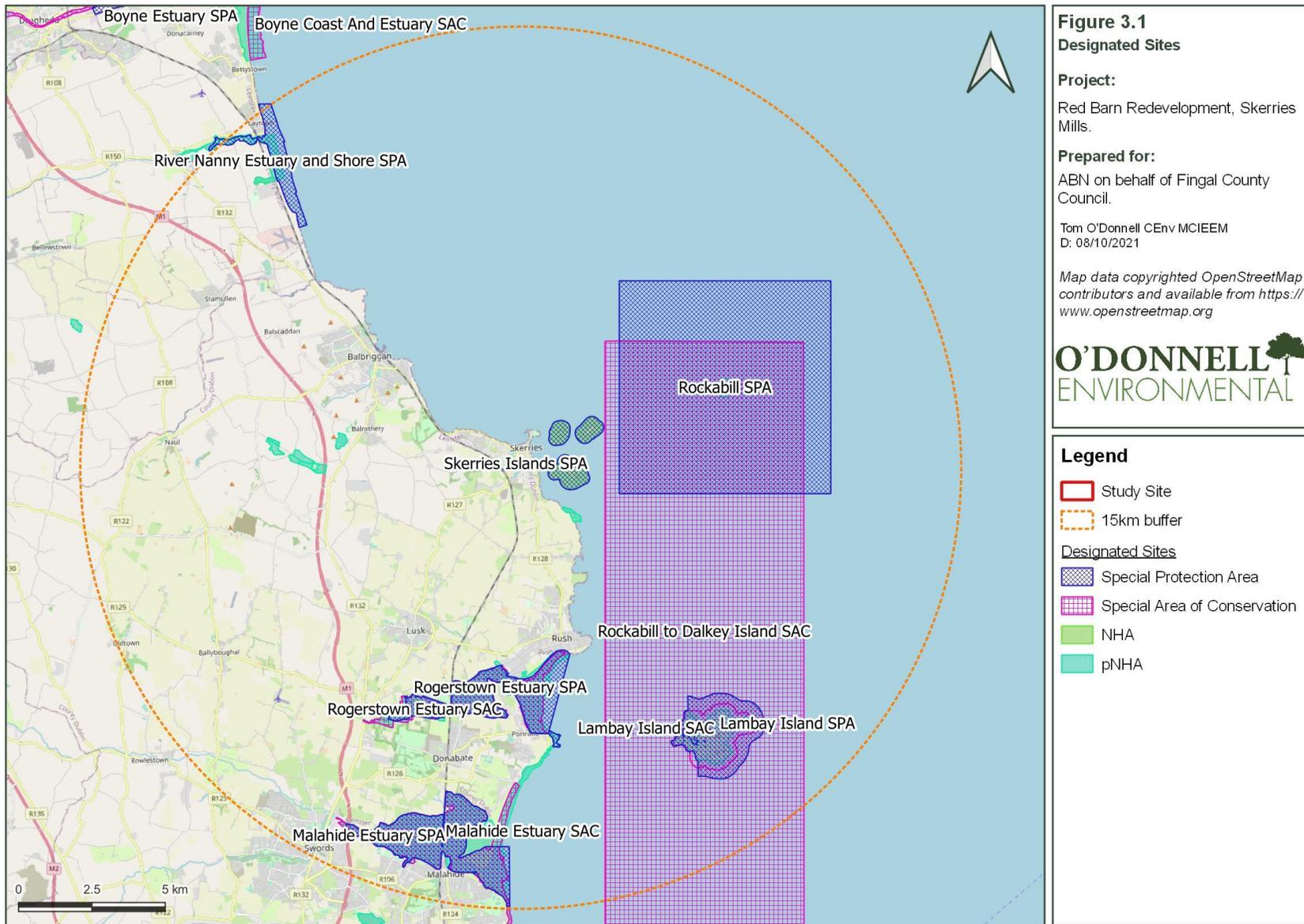


Figure 3.1
Designated Sites

Project:
Red Barn Redevelopment, Skerries Mills.

Prepared for:
ABN on behalf of Fingal County Council.

Tom O'Donnell CEnv MCIIEEM
D: 08/10/2021

Map data copyrighted OpenStreetMap contributors and available from <https://www.openstreetmap.org>

Legend

- Study Site
- 15km buffer

Designated Sites

- Special Protection Area
- Special Area of Conservation
- NHA
- pNHA

3.2 DATA SEARCH

National Biodiversity Data Centre holds previous records of bat presence from within the 10km square (O25) in which the proposed site is located. These records are provided in **Table 3.2** below. It is important to note that an absence of other bat species records is reflective of a lack of surveys undertaken to date rather than absence of bat species.

Table 3.2 - Records of species presence in the relevant 10km grid square (O25) (NBDC).

Common Name	Species name	Date of last record
Brown Long-eared Bat	<i>Plecotus auritus</i>	30/08/2012
Daubenton's Bat	<i>Myotis daubentonii</i>	25/06/2004
Leisler's Bat	<i>Nyctalus leisleri</i>	09/06/2015
Nathusius Pipistrelle	<i>Pipistrellus nathusii</i>	17/08/2009
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	28/04/2014
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	30/08/2012

The overall bat suitability index value (32.89) according to 'Model of Bat Landscapes for Ireland' (Lundy *et al.* 2011) suggests the landscape in which the proposed site is located is of moderate suitability for bats in general. Species specific scores are provided in **Table 3.3**.

Table 3.3 - Suitability of the study area for the bat species according to 'Model of Bat Landscapes for Ireland' (Lundy *et al.* 2011).

Common name	Scientific name	Suitability index
<i>All bats</i>		32.89
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	52
Brown long-eared bat	<i>Plecotus auritus</i>	42
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	45
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	0
Leisler's bat	<i>Nyctalus leisleri</i>	47
Whiskered bat	<i>Myotis mystacinus</i>	38
Daubenton's bat	<i>Myotis daubentonii</i>	30
Nathusius pipistrelle	<i>Pipistrellus nathusii</i>	8
Natterer's bat	<i>Myotis nattererii</i>	34

Bat Conservation Ireland conducted a search of available bat records within 1km of the study area on 7th September 2021, and no records were held.

3.3 VISUAL BAT ROOST SURVEY

Potential roosting opportunities at the study site consist of man-made features only. The study area lacks trees which may provide suitable bat roosting opportunities. The proposed project will involve

redevelopment of the existing Red Barn structure and disturbance to roosting bats and loss of roosting opportunities would occur should roosting bats occur within.

A daytime visual inspection was carried out with the aim of identifying bat roosts by either the presence of bats or the presence of signs of past bat roosting. A detailed visual survey was carried out inspecting all accessible internal and external areas of the building.

Bats were not confirmed to be roosting at the building and no evidence of current or historic roosting was found during internal and external inspections of the building. The building has a corrugated steel roof and windowless walls and all areas of the building experience significant levels of disturbance as it is used as storage area and is subject to light and noise ingress due to human activity (see **Appendix A**). Suboptimal potential roosting opportunities exist only for crevice dwelling bat species, which may roost singly or in small numbers in potential roosting features present. The building is considered to have negligible potential to host a maternity colony of any bat species.

Based upon the results of the visual roost survey, the Red Barn structure is considered to be of 'low' potential suitability to support roosting bats (see **Table 2.1**).

Historic buildings associated with the Skerries Mills immediately adjoin the study area. Visual assessment identified roosting potential in these buildings, but no evidence of current or historic roosting was found during visual inspection and bat activity surveys.

3.4 BAT ACTIVITY SURVEY

A dusk emergence survey and dawn re-entry survey were carried out by two surveyors, aided by the use of ultrasonic detectors and a thermal imaging camera. The surveys were carried out on 20th September 2021 and 21st September 2021.

No evidence of bat roosting was observed during the emergence (dusk) or re-entry (dawn) surveys. A low level of bat activity was recorded during this survey overall. Of the nine species resident in Ireland, two species of bat was encountered namely Soprano Pipistrelle (*Pipistrellus pipistrellus*) and Leisler's Bat (*Nyctalus leisler*). These species are common and widespread species in Ireland. A small level of Soprano Pipistrelles foraging activity was recorded at the rear (east) of the Red Barn building approximately 20 minutes after sunset for 15 minutes, after which no further activity was recorded. A single Leisler's Bat was observed commuting high overhead in a westerly direction. No foraging behaviour was noted from the Leisler's Bat.

A thermal imaging camera was used as an aid to visual detection during the emergence survey. Following the survey, the footage was reviewed and confirmed that no emergence was evident from structures within the field of vision (see **Plate 3.1**).

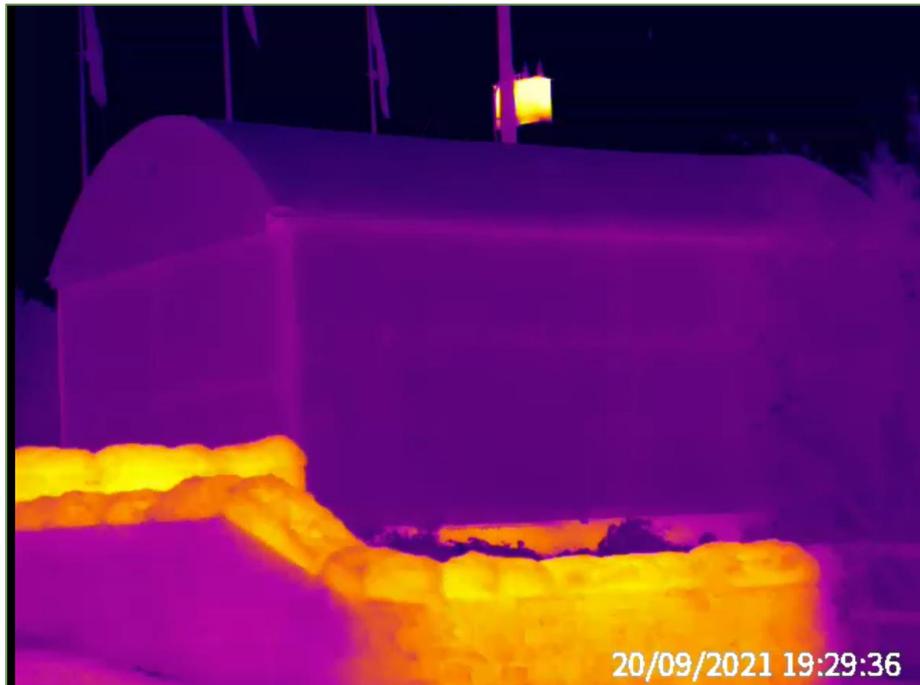


Plate 3.1 Image from thermal camera showing field of view recorded.

3.5 SUMMARY OF RESULTS

The study site within Skerries Mills, Skerries, Co. Dublin occurs in a semi-urban location which experiences anthropogenic disturbance in the form of artificial lighting and noise. No optimal roosting opportunities are present within the study site. The site provides suboptimal foraging and commuting habitat for bats.

No evidence of bat roosting, current or historic, was recorded at the Red Barn or nearby buildings during daytime visual inspection and night-time active surveys. The Red Barn structure, which is proposed for demolition, is considered to have '**low**' suitability for roosting bats, and negligible potential for a maternity roost for any species.

While no evidence of current or historic bat roosting could be found, some occasional roosting by small numbers of bat(s) may occur at least occasionally.

4 Discussion

Fingal County Council intends to carry out redevelopment works on the Red Barn structure at Skerries Mills, in Skerries, Co. Dublin. The potential of these works to impact upon roosting, commuting and foraging bats has been considered.

A comprehensive and appropriate study has been carried out and no evidence of bat roosting, current or historic, could be found although some sub-optimal roosting opportunities were identified. A low level of activity was recorded overall with two species that are common and widespread bat recorded commuting and foraging briefly in the area. The proposed site is considered to be of '**local importance, lower value**' to bats.

Considering the lack of any evidence of bat roosting, the exposed and poorly connected nature of the structure to the wider landscape and the suboptimal nature of potential roosting opportunities identified the proposed works overall are likely to have a '**neutral**' impact on bat conservation locally.

As the structure contains some potential to be used to by bats, even if only occasionally, measures are outlined below which will be implemented during works to avoid any impact on bats.

4.1 RECOMMENDATIONS

No roosting, current or historic, has been identified and Bat Conservation Ireland holds no records of historic roosting at the study area. A bat derogation license is not required to facilitate the proposed works, based on current information. No specific timing restrictions are recommended.

In the unlikely event that bat(s) are found during works, work will stop, and the advice of an Ecologist will be sought. A derogation license will be needed to facilitate works which disturb a bat roost.

Pre-works survey or monitoring of works by a bat licensed Ecologist is not considered warranted in this instance.

In order to reduce the ecological disturbance of light spillage, the light sources used for external lighting (including subsequent replacements) will be specified as follows:

- LEDs will be used, as these emit minimal ultra-violet light.
- White and blue wavelengths will be avoided; wavelength will be <4,200 kelvin.
- Lights will peak higher than 550nm (BCT, 2018).

5 References

Bat Conservation Trust (BCT) (2018). Bats and Artificial Lighting in the UK. Guidance Note 08/18.

CIEEM (2018). Guidelines for Ecological impact Assessment in the UK And Ireland - Terrestrial, Freshwater, Coastal and Marine. Version 1.1.

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NRA (National Roads Authority, now TII). (2009). Guidelines for Assessment of Ecological Impacts of National Roads Schemes. Revision 2, 1st June 2009. NRA, Dublin.

Russ, J. (2012). British Bat Calls - A Guide to Species Identification. Pelagic Publishing. Exeter, UK.

Appendix A – Photographic Record



A1. Front (west) elevation of target structure.



A2. Rear (east) elevation of target structure.



A3. View of interior of target building with light ingress clearly visible.



A4. North-western view of target structure at dusk showing exposure to light pollution.



A5. Internal visual inspection of potential roosting features.



A6. Invasive plants (Chilean Rhubarb and Himalayan Balsam) growing within the study area.



A5. Thermal imaging camera used during emergence/re-entry surveys.



A6. Treeline and watercourse located south of target structure.

Appendix B – Project Information

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Appropriate Assessment Screening Report

Skerries Mills, Skerries, Co.
Dublin.

November 2021

Prepared for:
ABN Consultants on behalf of Fingal County Council

Comhairle Contae
Fhine Gall
Fingal County
Council



O'DONNELL 
ENVIRONMENTAL

Summary

Project: Red Barn Redevelopment

Report by: Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM.

Statement of Competence: Tom O'Donnell is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has over 10 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads, cycleways and residential developments. Tom is licensed by NPWS for roost disturbance (Ref: DER/BAT 2021-04) and to capture bats (C181/2020).

Project Reference: 2020/65			
Document Rev. No.	Status	Contributor	Date
A	Draft Issue	TO'D, DP	08.10.2021
1	Final Issue	TO'D	01.11.2021

Table of Contents

Executive Summary	iv
1 Introduction	1
1.1 Appropriate Assessment Process	1
1.2 Legislative Context	2
1.3 Statement of Authority	2
1.4 Description of the Proposal	2
1.5 Do Nothing Scenario	3
2 Methodology	5
2.1 Desk Study	5
2.2 Site Visit	5
3 Appropriate Assessment Screening	6
3.1 Description of the Natura 2000 Sites	6
3.2 Hydrological Context	8
3.3 Identification of Potential Impacts on Natura 2000 Sites	8
3.3.1 <i>Potential Construction Phase Impacts</i>	8
3.3.2 <i>Operational Phase</i>	10
3.4 Likely Impacts of the Project on the Natura 2000 Sites	10
3.4.1 <i>Size, Scale & Land-take</i>	10
3.4.2 <i>Resource Requirements (water abstraction etc.)</i>	10
3.4.3 <i>Excavation Requirements</i>	11
3.4.4 <i>Emission (disposal to land, water or air)</i>	11
3.4.5 <i>Transportation Requirements</i>	11
3.4.6 <i>Duration of Operations</i>	11
3.4.7 <i>Cumulative Effects</i>	11
3.5 AA Screening Conclusion	14
4 References	15

Appendices

Appendix A – Photographic Record

Appendix B - Proposed Layout

Executive Summary

Fingal County Council propose to redevelop the Red Barn building at Skerries Mills in Skerries, Co. Dublin.

This report presents the results of a screening assessment, in support of the Appropriate Assessment process. The purpose of the report is to identify whether significant effects on the conservation objectives of any Natura 2000 site are likely to occur.

It is objectively concluded that the proposed project, either individually or in combination with other plans or projects, is not likely to have significant effects on any Natura 2000 site.

1 Introduction

O'Donnell Environmental was commissioned by ABN Consultants on behalf of Fingal County Council to undertake an Appropriate Assessment (AA) in relation to a proposed redevelopment at Skerries Mills, Skerries, Co. Dublin. This Appropriate Assessment (AA) screening report represents the product of the Appropriate Assessment process.

Fingal County Council intends to redevelop the Red Barn building at Skerries Mills which comprises of:

- The demolition of the existing metal clad red barn building.
- The construction of a new structure roughly within the same building footprint.
- A multi-purpose assembly area within the new structure in addition to a kitchen, toilet, storage area, and lobby.
- Associated infrastructure including an external deck area and external lighting.

The study site is within the Skerries Mills complex. Skerries Mills is currently used for tourism and amenity purposes by the general public. Adjoining land uses include amenity parkland, recreational sports pitches, and residential land uses. The site of Skerries Mills is bordered by a number of domestic residences as well as some treelines and hedgerows. The Mill Stream adjoins Skerries Mills to the south. A site location map is presented in **Figure 1.1**.

This Appropriate Assessment has been undertaken in accordance with the following guidance documents:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – European Commission Methodical Guidance on the provisions of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (European Commission 2001).
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (DoEHLG 2009).

This assessment was undertaken in parallel with an Environmental Impact Assessment (EIA) Screening Report. The EIA Screening Report (O'Donnell Environmental, 2021) accompanies the current planning application.

1.1 APPROPRIATE ASSESSMENT PROCESS

The 'Appropriate Assessment' process that consists of up to four stages, carried out consecutively. This process is summarised as follows:

- Stage 1: A screening assessment is undertaken to identify whether in view of best scientific knowledge and in light of the conservation objectives of the Natura 2000 site(s) significant impacts on a Natura 2000 site(s) are likely to arise from the project or plan in question (individually or in combination with other plan or projects), in the absence of mitigation. If the likelihood of significant impacts cannot be ruled out, or if uncertainty exists, then the process moves on to Stage 2.
- Stage 2: Carried out when a screening assessment determines impacts on the Natura 2000 sites(s) are likely to arise from the project or plan, or where uncertainty exists, and considers potential mitigation measures to avoid or reduce adverse impacts. The outcome of a Stage 2 and higher assessment is presented in a report known as a Natura Impact Statement (NIS). The NIS is intended to assist the competent authority to conduct the appropriate assessment.

- Stage 3: Carried out to assess alternative solutions when it is considered that mitigation measures will not be able to adequately avoid or minimise potential adverse impacts on a Natura 2000 site(s).
- Stage 4: Carried out to consider compensatory measures when no alternative solutions exist but the proposed activity or development is deemed to be of Imperative Reasons of Overriding Public Interest (IROPI).

1.2 LEGISLATIVE CONTEXT

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and of wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (79/409/EEC) seeks to protect birds of special importance by the designation of Special Protected Areas (SPAs). These designations form part of Natura 2000, a network of key conservation sites throughout the European Community. Article 6(3) of the Habitats Directive requires member states to carry out an 'appropriate assessment' of the implications of plans and projects on the Natura 2000 network. The Habitats Directive has been transposed into Irish law and the relevant Regulations are the European Communities (Birds and Natural Habitats) Regulations 2011.

1.3 STATEMENT OF AUTHORITY

Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has over 10 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads, cycleways and residential developments. Tom is licensed by NPWS for roost disturbance (Ref: DER/BAT 2021-04) and to capture bats (C181/2020).

1.4 DESCRIPTION OF THE PROPOSAL

Fingal County Council intends to redevelop the Red Barn building at Skerries Mills. The proposed work comprises of the demolition of the existing metal clad Red Barn building, apart from a section of the wall that runs along the boundary adjacent to the outlet stream from the existing mill. The latter structure will be retained to achieve separation of the working area and adjoining watercourse. The Red Barn building will be replaced through the construction of a new structure approximately within the same building footprint. This new building will contain a multi-purpose assembly area within the new structure in addition to a kitchen, toilet, storage area, and lobby along with ancillary elements including an external deck and external lighting.

Foul water discharge will connect to existing services on-site and will be conveyed to Barnageeragh (Skerries) Wastewater Treatment Plant (IETP_722) for treatment while surface water will be discharged from site in line with SUDS design principles.

Construction works will be carried out according to the best practice standards detailed in the accompanying 'Outline Construction and Environmental Management Plan' (oCEMP) (ABN, 2021). For the avoidance of doubt, these measures are not required specifically to reduce or avoid a likely significant impact on any European Designated site.

1.5 DO NOTHING SCENARIO

If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term. Human activity associated with tourism and public use of the amenity parkland and recreational sports pitches would continue. Existing surface water drainage patterns would continue as occurs currently.



Figure 1.1
Study Site Location

Project:
Red Barn Redevelopment, Skerries Mills.

Prepared for:
ABN on behalf of Fingal County Council.

Tom O'Donnell CEnv MCIEEM
D: 08/10/2021

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O'DONNELL ENVIRONMENTAL

Legend

- Study Site
- Skerries Mills

2 Methodology

This Appropriate Assessment was informed by desk-based and site-based assessments.

2.1 DESK STUDY

A desk study was carried out to collate relevant available information including the following:

- National Parks and Wildlife Service (NPWS) (online).
- National Biodiversity Data Centre (NBDC) (online)¹.
- The Environmental Protection Agency (EPA) website.

2.2 SITE VISIT

A site visit was carried out by Tom O'Donnell and Donnachadh Powell on 20th September 2021. Full access to the site was provided by the Client.

¹ Accessed 27th September 2021

3 Appropriate Assessment Screening

The proposed site is currently used for tourism and amenity purposes by the general public. The existing Red Barn is used for storage of materials and provides a small office space. Adjoining land uses include amenity parkland, recreational sports pitches, and residential land uses. Skerries Mills is bordered by a number of domestic residences as well as some treelines and hedgerows.

The proposed development is not directly connected with or necessary for the management of any Natura 2000 site.

3.1 DESCRIPTION OF THE NATURA 2000 SITES

The proposed site is not located within a Natura 2000 site. Ten Natura 2000 sites are located within 15km of the study area (**Table 3.1**). Skerries Islands SPA (Site Code: 004122) is the closest Natura 2000 site which is situated approximately 980 meters east of the proposed development site and is shown in **Figure 3.1**. This site lists Light-bellied Brent Goose (*Branta bernicla hrota*) as a qualifying interest. These birds are known to use areas of managed grassland for foraging opportunities. The areas of amenity grassland adjacent to the site present suitable foraging spaces for these birds.

Table 3.1 - Natura 2000 sites within 15km.

Site Name	Site Code	Distance (km)
Malahide Estuary SPA	004025	11.3
River Nanny Estuary and Shore SPA	004158	11
Malahide Estuary SPA	004025	10.7
Lambay Island SPA	004069	9.6
Rogerstown Estuary SPA	004015	6.3
Rockabill SPA	004014	3.3
Skerries Islands SPA	004122	0.9
Lambay Island SAC	000204	10
Rogerstown Estuary SAC	000208	6.3
Rockabill to Dalkey Island SAC	003000	2.8

No further sites, beyond the standard 15km search area are considered to be relevant to the current assessment due to the nature and scale of the proposed project and the lack of a source-receptor pathway between the proposed site and any other Natura 2000 sites

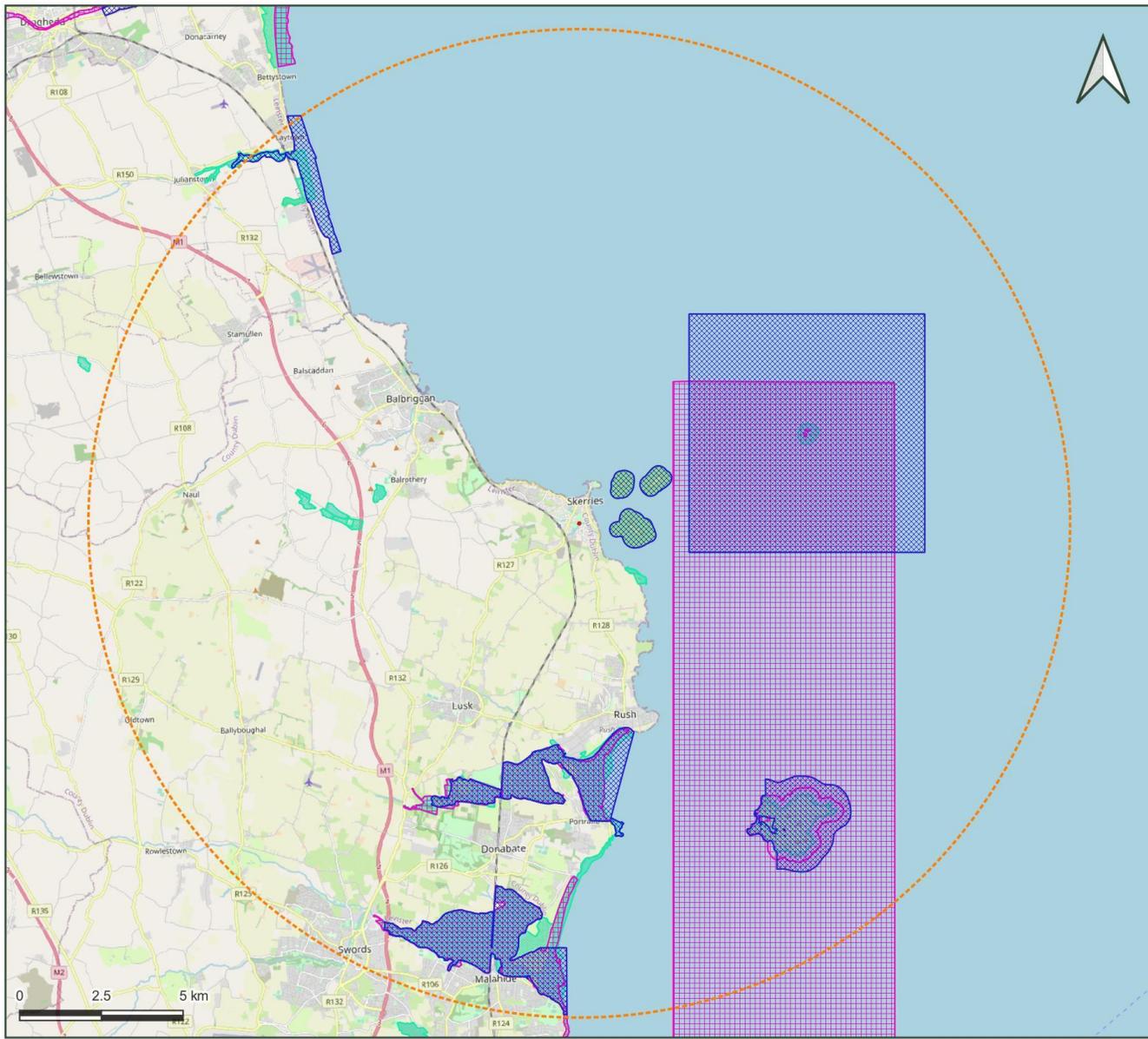


Figure 3.1
Designated Sites

Project:
 Red Barn Redevelopment, Skerries Mills.

Prepared for:
 ABN on behalf of Fingal County Council.

Tom O'Donnell CEnv MCIEEM
 D: 08/10/2021

Map data copyrighted OpenStreetMap contributors and available from <https://www.openstreetmap.org>

O'DONNELL ENVIRONMENTAL

Legend

- Study Site
- 15km buffer

Designated Sites

- Special Protection Area
- Special Area of Conservation
- NHA
- pNHA

3.2 HYDROLOGICAL CONTEXT

The proposed site is located in the Nanny-Devlin Catchment, Hydrometric Area 08, sub-catchment Palmerstown_SC_010. The Mill Stream (EPA code: IE_EA_08M030500) is a third-order stream proximal to the southern boundary of Skerries Mills which discharges eastward to South Beach and onward to the Irish Sea. EPA do not carry out Q-value sampling on the Mill stream and its WFD status is "Unassigned" (River Waterbody WFD Status (2013-2018)).

The Mill Stream has been modified and some of its flow is used to power a mill wheel within the Skerries Mill site. The stream had a low water level during the site visit and has dense vegetation growing in the middle of the channel which suggests water levels remain low for long periods of time (see **Appendix A**). Surface water likely drains from the proposed site into this stream and is carried east downstream during periods of heavy rain.

The EPA undertakes survey of the water quality of estuaries and near shore coastal waters and based on this they categorise the water quality of the coastal area east of the proposed site known as Northwestern Irish Sea (HA 08) (IE_EA_020_0000) as having "High" status (Coastal Waterbody WFD Status 2013-2018).

3.3 IDENTIFICATION OF POTENTIAL IMPACTS ON NATURA 2000 SITES

Consideration is given here to identifying any aspects of the proposal which are likely to impact on the relevant Natura 2000 sites (identified above), and to identifying if uncertainty exists as to likelihood of occurrence.

The likelihood of effects is assessed considering a number of indicators including:

- Habitat loss
- Habitat alteration
- Habitat or species fragmentation
- Disturbance and/or displacement of species
- Water quality and resource.

3.3.1 Potential Construction Phase Impacts

3.3.1.1 Habitat loss or deterioration

The proposed works are not located within a Natura 2000 site and therefore no direct habitat loss will occur. Habitat loss or deterioration of the ecological status of designated sites can occur from the indirect effects of contaminated run-off or discharge into the aquatic environment, through siltation, nutrient release and/or contamination. Should habitat loss or deterioration of the ecological status of the relevant Natura 2000 sites, a negative impact on the qualifying interests of the relevant designated sites may result. Given the nature and scale of the proposed works, the separation distances involved and the significant assimilation capacity available in the Irish Sea, there is no likelihood of effects on any other Natura 2000 site including Skerries Islands SPA as a result of habitat loss or deterioration related to the construction phase of the proposed development.

3.3.1.2 Surface Water

The construction phase of the proposed development will involve site preparation (e.g. demolition, excavation etc.). Construction phase works often have the potential to result in sediment run-off during prolonged heavy rain where excavated areas and spoil heaps are unprotected. Similarly, the operation and refuelling of machinery during construction has the potential to result in leaks of hydrocarbons in the absence of mitigation. Industry standard best practice measures contained within Control of Water Pollution from Construction Sites, Good Practice Guidelines (CIRIA, 2001) have been incorporated in the proposed design and methodology. These are detailed in the oCEMP (ABN, 2021) and include:

- All machinery will be regularly inspected and maintained, and all vehicles will carry mobile spill kits. Staff will be instructed in the proper use and disposal of spill kits.
- Through all stages of the construction phase the contractor will ensure that good housekeeping is maintained at all times and that all site personnel are made aware of the importance of the nearby aquatic environments and the requirement to avoid pollution of all types.
- Sufficient on-site cleaning of vehicles prior to arrival at, and upon leaving the site and on nearby roads, will be carried out, particularly during groundworks and works in vicinity of drains and watercourses.
- The Construction Manager will fulfil the Environmental Manager role and will be responsible for the pollution prevention programme and will ensure that checks are carried out to ensure compliance. A record of these checks will be maintained.
- An Ecological Clerk of Works will be engaged to carry out regular site audits.

During the operational phase of the project, surface water will be discharged from site in line with SUDS design principles.

The industry standard measures outlined above are considered adequate to avoid any likely impact on a Natura 2000 site, and no further measures are warranted in this instance.

Given the nature and scale of the proposed works, the distances involved, and the assimilation capacity available in the Irish Sea, there is no likelihood of effects on any other Natura 2000 site including Skerries Islands SPA.

3.3.1.3 Foul Water

Existing facilities available at Skerries Mills will be utilised to provide the temporary welfare facilities in the construction phase. No impacts will arise as a result of foul water during the construction phase.

3.3.1.4 Noise and Dust

Localised increases in noise and dust levels are likely to occur during the construction phase. No heavy construction techniques such as blasting or pile driving are proposed but noise will occur through the operation of machinery etc. Dust may arise during construction works if dry soil or other material is allowed to become windborne. The proposed site is approximately 980m west of Skerries Islands SPA, with the townland of Skerries present between the two.

Given the nature and scale of the proposed works, and the distances involved, it is considered that there is no likelihood of effects from noise and dust on Skerries Islands SPA or any other Natura 2000 site as a result of the proposed works.

3.3.1.5 Ex-situ Impacts on Birds

Disturbance and/or displacement may occur where populations of a mobile species listed as a qualifying interest of a Natura 2000 site suffer negative effects outside of the Natura 2000 site (ex-situ impacts).

Such effects also include fatalities and loss of foraging opportunities caused by habitat loss, degradation or disturbance.

No hazardous activities are proposed which have potential to give rise to bird fatalities. No suitable habitat for any bird species associated with any relevant Natura 2000 site exists within the proposed stud site. No records of usage of the wider Skerries Mills site by birds listed as qualifying interests of Skerries Islands SPA was found during surveys for the current report. The proposed site mostly consists of intensively managed grassland and this habitat is of limited value to most bird species. Light-bellied Brent Geese, a qualifying interest of Skerries Islands SPA, are known to use managed grasslands as foraging areas. Temporary disturbance/displacement of this mobile species could occur via noise that could temporarily exclude them from the nearby suitable foraging habitats during the construction phase. Given the scale and location of the proposed works, within an intensively used area, this impact is unlikely to arise.

3.3.2 Operational Phase

During the operational phase the study site is intended to continue to be used for tourism and amenity purposes albeit to a greater intensity than is currently the case.

The project will increase the capacity of Skerries Mills to cater to larger numbers of customers and will therefore result in an increase in footfall. Foul water discharge will connect to existing services on-site and will be conveyed to Barnageeragh (Skerries) Wastewater Treatment Plant (IETP_722) for treatment. This facility provides secondary treatment and according to the most recent Annual Environmental Monitoring Report (Irish Water, 2020) the plant is within its design capacity and compliant with environmental standards.

The operational phase impacts of the proposed project otherwise do not differ significantly from the impacts already occurring at the site (the do-nothing scenario) in terms of habitat loss, disturbance and surface water quality.

3.4 LIKELY IMPACTS OF THE PROJECT ON THE NATURA 2000 SITES

As outlined above, it is deemed that the proposed development does not have the potential to impact Skerries Islands SPA via hydrological connectivity or other pathways. All works will be carried out applying standard environmental controls throughout the construction phase to prevent any damaging run-off from the site to local watercourses (see CIRIA 2001 & 2010). The construction of the proposed development will be implemented in accordance with the Outline Construction Environmental Management Plan (OCEMP) for the proposed development (ABN, 2021).

The likely impacts are discussed below.

3.4.1 Size, Scale & Land-take

There will be no direct impacts on any Natura 2000 site. The proposed site is c. 0.08 hectares in area.

3.4.2 Resource Requirements (water abstraction *etc.*)

There will be no resource requirements (including water abstraction) from Natura 2000 sites as a result of the proposed works.

3.4.3 Excavation Requirements

Not Applicable.

3.4.4 Emission (disposal to land, water or air)

No significant impact on any Natura 2000 site are likely to occur as a result of emissions from the proposed development in the construction or operational phases.

3.4.5 Transportation Requirements

Transport requirements during construction and operation will use existing road network and will not occur within the boundaries of any Natura 2000 sites.

3.4.6 Duration of Operations

For the purposes of environmental assessment, the duration of operations at the proposed site is assumed to be permanent.

3.4.7 Cumulative Effects

A review of the National Planning Database (NPD) was undertaken to identify relevant planning applications proximal to the study area. An appropriate site search area was defined consisting of 200m from the site boundary and 50m from downstream watercourse. A search of planning applications within this area within the last 5 years was undertaken by Impact GIS on behalf of O'Donnell Environmental. **Table 3.2** below provides the results of this search. The locations of applications are shown in **Figure 3.2**.

No planning applications which are relevant to the assessment of in-combination effects were found.

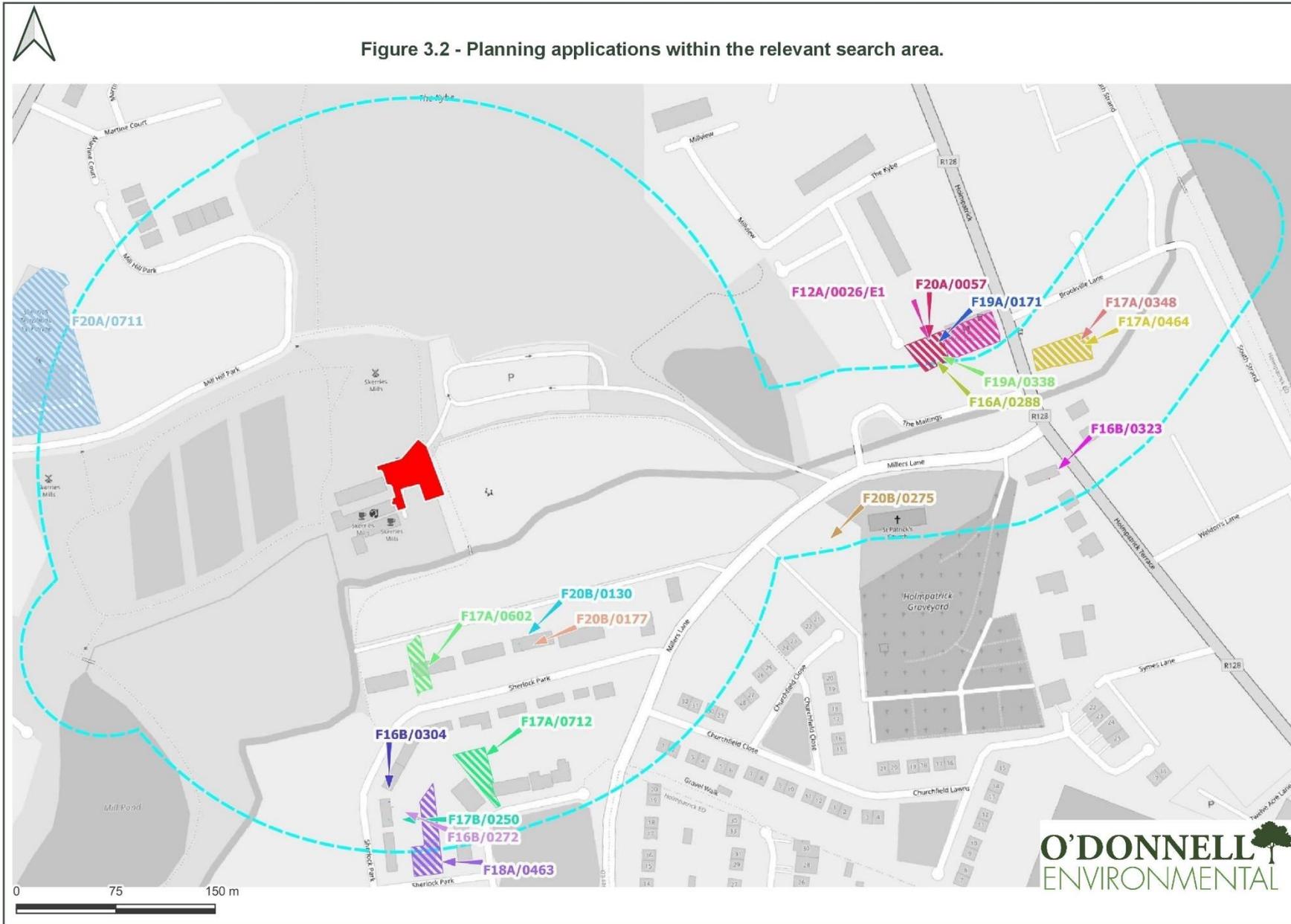
Table 3.2 - Planning applications within the relevant search area.

Application Number	Development Description	Status	Decision Date
F12A/0026/E1	The change of use of existing first floor commercial premises (guestho...	Granted	08/05/2017
F16A/0288	Outline planning permission for a 2 storey dwelling, new vehicular ent...	Granted	15/12/2016
F16B/0272	Partially demolish an existing single storey extension and replace wit...	Withdrawn	15/11/2016
F16B/0304	Partially demolish an existing single storey extension and replace wit...	Granted	18/01/2017
F16B/0323	Construction of (i) a first floor extension to master bedroom at rear...	Granted	09/02/2017
F17A/0348	The construction of a single storey extension to the side (north facin...	Invalid	25/07/2017
F17A/0464	The construction of a single storey extension to the side (north facin...	Granted	25/09/2017
F17A/0602	Construction of single storey extension to side of existing dwelling t...	Granted	20/11/2017

F17A/0712	Permission for demolition of existing side extension and the construct...	Granted	09/03/2018
F17B/0250	Construction of new bedroom and en-suite extension at first floor leve...	Granted	13/12/2017
F18A/0463	Permission to convert the existing two bedroom Granny flat to the rear...	Refused	28/09/2018
F19A/0171	Permission for new 2 storey detached dwelling, new vehicular and pedes...	Withdrawn	27/05/2019
F19A/0338	Permission for new 2 storey detached dwelling, new vehicular entrance ...	Refused	16/09/2019
F20A/0057	Permission for new 2 storey detached dwelling, new vehicular entrance ...	Granted	25/09/2020
F20A/0711	Proposed development which will have a gross floor area of 1,482.5 sq.	Granted	06/09/2021
F20B/0130	Single storey extension to side of existing dwelling to accommodate a...	Invalid	15/07/2020
F20B/0177	Permission for development of a single storey extension to side of exi...	Granted	18/09/2020
F20B/0275	Permission to build an extension. This will comprise an extension of 4	Granted	05/01/2021

Note: 'Development Description' field was truncated by the Planning Authority when providing data to the NPD.

Figure 3.2 - Planning applications within the relevant search area.



3.5 AA SCREENING CONCLUSION

This Appropriate Assessment screening exercise has been carried out based on the best available scientific information and data, an ecological site walkover and project details provided by ABN Consultants and Fingal County Council.

It is considered that avoidance and mitigation measures are not required to eliminate the likelihood of significant negative impacts occurring as a result of the proposal.

It is concluded that the proposed project is not likely to cause significant negative effects on Skerries Islands SPA, or any other Natura 2000 site, individually or in combination with other plans or projects.

4 References

CIRIA (2001). Control of Water Pollution from Construction Sites, Good Practice Guidelines (CIRIA C532).

CIRIA (2004). Sustainable drainage systems. Hydraulic, structural and water quality advice (C609B).

Council of the European Communities (1992) Council Directive of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC). OJL 206/35, 1992.

Department of the Environment, Heritage and Local Government (DoEHLG) (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of Environment, Heritage and Local Government.

European Commission (2001). 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. Luxembourg: Office for Official Publications of the European Communities.

NPWS (2013a). The Status of EU Protected Habitats and Species in Ireland. Species Assessments Volume 2, Version 1.0. Unpublished Report, National Parks and Wildlife Service. Department of Arts, Heritage and the Gaeltacht, Dublin.

NPWS (2019a). The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill.

NPWS (2019b). The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill.

NPWS (2021) Conservation Objectives: Skerries Islands SPA 004122. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Outline Construction and Environmental Management Plan (oCEMP) for the Red Barn Re-Development at Skerries Mills Skerries Co. Dublin' (ABN, 2021).

Vickery J. & Gill J. (1999). Managing grassland for wild geese in Britain: a review. Biological Conservation. Volume 89 – Issue 1.

Appendix A – Photographic Record



A1. Front (west) elevation of target structure.



A2. Rear (east) elevation of target structure.



A3. Tourism buildings adjacent to target structure.



A4. Southern elevation of target structure with associated tourism buildings.



A5. Mill Stream with low water levels and dense vegetation.



A6. Southern view of target structure with Mill Stream visible on right side.



A7. Mill Stream view immediately south of target structure.



A8. View of Mill Stream downstream from site with amenity parkland on either side.

Appendix B - Proposed Layout

O'DONNELL 
ENVIRONMENTAL

EIA Screening Report

Skerries Mills, Skerries, Co. Dublin.

November 2021

Prepared for:
ABN Consultants on behalf of Fingal County Council

Comhairle Contae
Fine Gall
Fingal County
Council



O'DONNELL 
ENVIRONMENTAL

Summary

Project: Red Barn Redevelopment

Report by: O'Donnell Environmental Ltd.

Statement of Competence: O'Donnell Environmental is an independent consultancy established in 2019. O'Donnell Environmental is a Chartered Institute of Ecology and Environmental Management (CIEEM) 'Registered Practice' which demonstrates our commitment to high professional standards, accountability and the delivery of the best outcomes for biodiversity and our clients.

Tom O'Donnell is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has over 10 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads, cycleways and residential developments. Tom is licensed by NPWS for roost disturbance (Ref: DER/BAT 2021-04) and to capture bats (C181/2020).

Project Reference: 2021/41			
Document Rev. No.	Status	Contributor	Date
A	Draft Issue	TO'D, DP	08.10.2021
1	Final Issue	TO'D	01.11.2021

Table of Contents

Executive Summary	iv
1 Introduction	1
1.1 Legislative Context	1
1.2 Statement of Authority	1
1.3 Description of the Proposal	2
1.3.1 <i>Do Nothing Scenario</i>	2
1.4 Methodology	2
1.4.1 <i>Desk Study</i>	2
1.4.2 <i>Site Visit</i>	2
2 EIA Screening	4
2.1 Establishing if the proposal is a sub-threshold development	4
2.2 Preliminary Examination	5
2.3 Screening Assessment	6
3 EIA Screening Conclusion	11
4 References	12

Appendices

Appendix A – Photographic Record

Appendix B - Proposed Layout

Executive Summary

Fingal County Council propose to redevelop the Red Barn building at Skerries Mills in Skerries, Co. Dublin.

This report presents the results of a Environmental Impact Assessment (EIA) screening assessment. This report is intended to provide the competent authority, Fingal County Council, with the information necessary to undertake the EIA screening assessment in respect of the proposed development.

It is objectively concluded that the proposed project is not required to undergo EIA.

1 Introduction

O'Donnell Environmental was commissioned by Fingal County Council to prepare this Environmental Impact Assessment (EIA) Screening Report for the proposed redevelopment at Skerries Mills, Skerries, Co. Dublin.

Fingal County Council intends to redevelop the Red Barn building at Skerries Mills which comprises of:

- The demolition of the existing metal clad red barn building.
- The construction of a new structure roughly within the same building footprint.
- A multi-purpose assembly area within the new structure in addition to a kitchen, toilet, storage area, and lobby.
- Associated infrastructure including an external deck area and external lighting.

The site is currently used for tourism and amenity purposes by the general public. Adjoining land uses include amenity parkland, recreational sports pitches, and residential land uses. The site of Skerries Mills is bordered by a number of domestic residences as well as some treelines and hedgerows.

This report has been prepared to inform an opinion as to whether or not the proposed development should be subject to EIA. This report establishes if the proposed project requires EIA mandatorily or as a result of categorisation in a sub-threshold class of development requiring EIA. This report presents information consistent with the requirements of section 176 of the Planning and Development Act 2000 as amended, including the information specified in schedule 7A of the Planning and Development Regulations 2001.

This report provides the competent authority, Fingal County Council, with the information necessary to undertake the EIA screening assessment in respect of the proposed development. The final determination as to whether an EIAR is required will be made by Fingal County Council, as the competent authority, in its screening assessment.

1.1 LEGISLATIVE CONTEXT

The EIA Directive 2011/92/EU (as amended by Directive 2014/52/EU) requires assessment of the effects of certain public and private projects on the environment. The EIA Directive aims to ensure a high level of protection for the environment and human health. It requires that an assessment of the likely significant effects a project will have on the environment is carried out, where relevant, before development consent is given (OPR, 2021).

The EIA Directive is transposed into Irish legislation by the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).

1.2 STATEMENT OF AUTHORITY

Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has over 10 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads,

cycleways and residential developments. Tom is licensed by NPWS for roost disturbance (Ref: DER/BAT 2021-04) and to capture bats (C181/2020).

1.3 DESCRIPTION OF THE PROPOSAL

Fingal County Council intends to redevelop the Red Barn building at Skerries Mills. The proposed work comprises of the demolition of the existing metal clad Red Barn building, apart from a section of the wall that runs along the boundary adjacent to the outlet stream from the existing mill. The latter structure will be retained to achieve separation of the working area and adjoining watercourse. The Red Barn building will be replaced through the construction of a new structure approximately within the same building footprint. This new building will contain a multi-purpose assembly area within the new structure in addition to a kitchen, toilet, storage area, and lobby along with ancillary elements including an external deck and external lighting.

Foul water discharge will connect to existing services on-site and will be conveyed to Barnageeragh (Skerries) Wastewater Treatment Plant (IETP_722) for treatment while surface water will be discharged from site in line with SUDS design principles.

Construction works will be carried out according to the best practice standards detailed in the accompanying 'Outline Construction and Environmental Management Plan' (oCEMP) (ABN, 2021).

1.3.1 Do Nothing Scenario

If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term. Human activity associated with tourism and public use of the amenity parkland and recreational sports pitches would continue. Existing surface water drainage patterns would continue as occurs currently.

1.4 METHODOLOGY

This Appropriate Assessment was informed by desk-based and site-based assessments. This EIA Screening Report follows guidelines and template formats provided by Office of Planning Regulator (OPR) (OPR, 2021).

1.4.1 Desk Study

A desk study was carried out to collate relevant available information including the following:

- National Parks and Wildlife Service (NPWS) (online).
- National Biodiversity Data Centre (NBDC) (online).
- The Environmental Protection Agency (EPA) website.

1.4.2 Site Visit

A site visit was carried out by Tom O'Donnell and Donnachadh Powell BSc Hons on 20th September 2021.

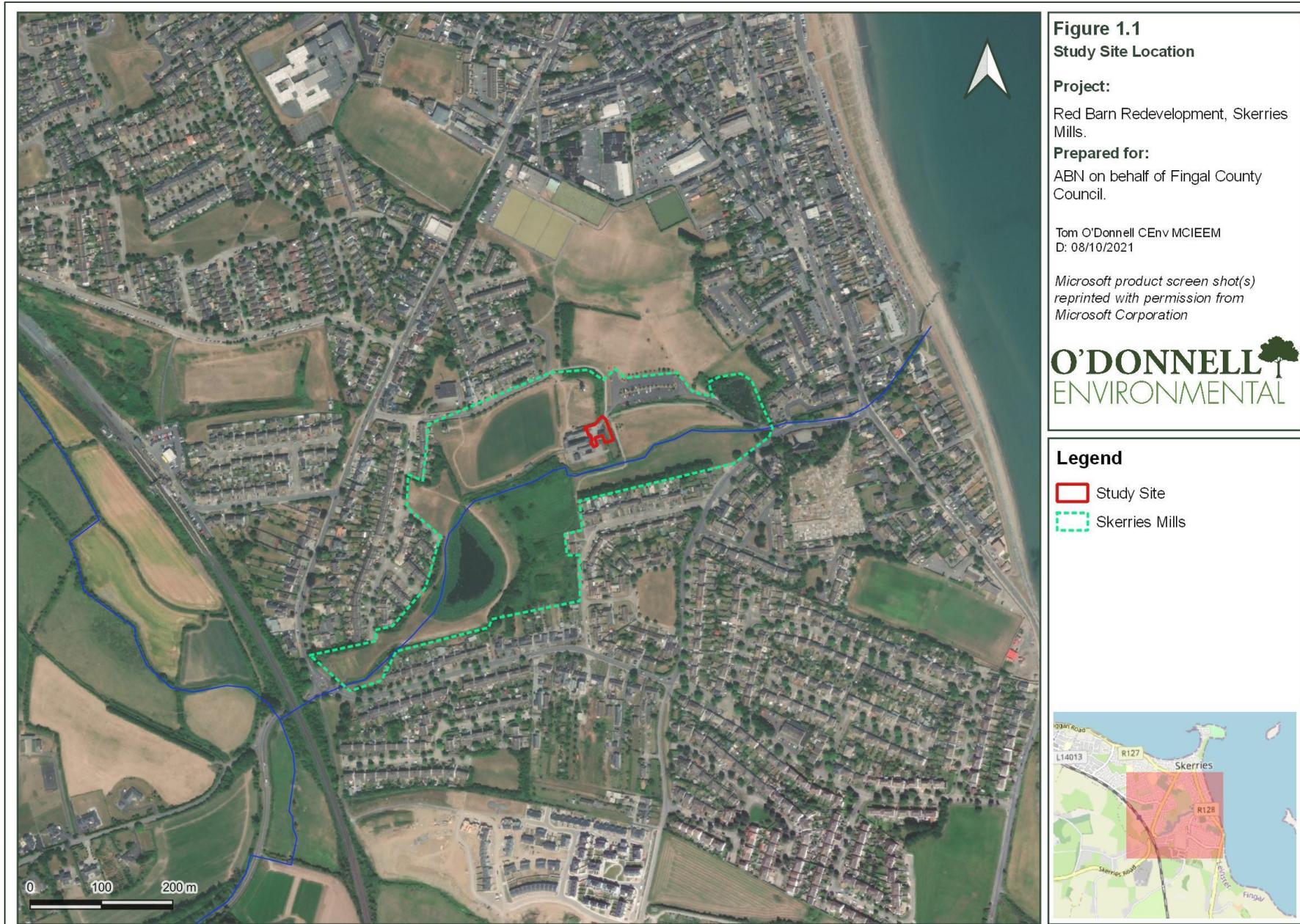


Figure 1.1
Study Site Location

Project:
Red Barn Redevelopment, Skerries Mills.

Prepared for:
ABN on behalf of Fingal County Council.

Tom O'Donnell CEnv MCIEEM
D: 08/10/2021

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Legend

- Study Site
- Skerries Mills



2 EIA Screening

An EIA screening exercise is provided below, which is intended to inform a decision by Fingal County Council. The EIA screening template provide by Office of Planning Regulator in July 2021 is adopted.

2.1 ESTABLISHING IF THE PROPOSAL IS A SUB-THRESHOLD DEVELOPMENT

Establishing if the proposal is a 'sub-threshold development':	
Was a Screening Determination carried out under Section 176A-C?	<input type="checkbox"/> Yes, no further action required <input checked="" type="checkbox"/> No, Proceed to Part A
A. Schedule 5 Part 1 - Does the development comprise a project listed in Schedule 5, Part 1 , of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, specify class <u> [insert here] </u>	EIA is mandatory No Screening required
<input checked="" type="checkbox"/> No	Proceed to Part B
B. Schedule 5 Part 2 - Does the development comprise a project listed in Schedule 5, Part 2 , of the Planning and Development Regulations 2001 (as amended) and does it meet/exceed the thresholds?	
<input type="checkbox"/> No, the development is not a project listed in Schedule 5, Part 2	No Screening required
<input type="checkbox"/> Yes the project is listed in Schedule 5, Part 2 and meets/exceeds the threshold, specify class (including threshold): <u> [specify class & threshold here] </u>	EIA is mandatory No Screening required
<input checked="" type="checkbox"/> Yes the project is of a type listed but is <i>sub-threshold</i> : <u> [insert here] </u>	Proceed to Part C
C. If Yes, has Schedule 7A information/screening report been submitted?	
<input checked="" type="checkbox"/> Yes, Schedule 7A information/screening report has been submitted by the applicant	Screening required Determination
<input type="checkbox"/> No, Schedule 7A information/screening report has not been submitted by the applicant	Preliminary Examination required

2.2 PRELIMINARY EXAMINATION

Preliminary Examination:		
	Comment:	Yes/No/ Uncertain:
<p>Nature of the development: <i>Is the nature of the proposed development exceptional in the context of the existing environment?</i></p> <p><i>Will the development result in the production of any significant waste, or result in significant emissions or pollutants?</i></p>	<p>The site is located in a semi-urban area which is connected via public roads and walkways to the wider landscape that consists of residential, recreational and amenity areas. The removal of waste will be managed in accordance with the submitted OCEMP (ABN, 2021).</p>	No.
<p>Size of the development: <i>Is the size of the proposed development exceptional in the context of the existing environment?</i></p> <p><i>Are there cumulative considerations having regard to other existing and/or permitted projects?</i></p>	<p>The size of the development is not considered to be exceptional in the context of the existing semi-urban environment.</p> <p>No.</p>	No.
<p>Location: <i>Is the proposed development located on, in, adjoining or does it have the potential to impact on an ecologically sensitive site or location?¹</i></p> <p><i>Does the proposed development have the potential to affect other significant environmental sensitivities in the area?</i></p>	<p>There are no ecologically sensitive locations within the immediate vicinity of the proposed project site.</p> <p>The nearest important designated site is located 980m to the east with the townland of Skerries located between the proposed project and the designated site.</p>	No.
Preliminary Examination Conclusion:		
Based on a preliminary examination of the nature, size or location of the development. (Tick as appropriate)		
<p style="text-align: center;">✓</p> <p>There is no real likelihood of significant effects on the environment.</p> <p>EIA is not required.</p>	<p style="text-align: center;">☐</p> <p>There is real likelihood of significant effects on the environment.</p> <p>An EIAR is required.</p>	<p style="text-align: center;">☐</p> <p>There is significant and realistic doubt regarding the likelihood of significant effects on the environment.</p> <p>Request the applicant to submit the Information specified in Schedule 7A for the purposes of a screening determination.</p> <p>Proceed to Screening Determination.</p>

¹ Sensitive locations or features includes European sites, NHA/pNHA, Designated Nature Reserves, land designated as a refuge for flora and fauna, and any other ecological site which is the objective of a CDP/LAP (including draft plans).

2.3 SCREENING ASSESSMENT

Screening Assessment		
Does the application include information specified in Schedule 7A?	Yes	EIA Screening Report submitted.
Other relevant information submitted:	Yes	AA Screening and Bat Survey Reports accompany the planning application.
Does the application include a NIS and/or other reports to enable AA screening?	Yes	AA Screening Report and Bat Survey Report submitted.
Is an IED/IPC/Waste Licence or Waste Water Discharge Authorisation (or review of licence/ authorisation) required from the EPA for the subject development?		No
If YES has the EPA been consulted?		n/a
Have any other relevant ² assessments of the effects on the environment been carried out pursuant to other relevant Directives –for example SEA or AA?		n/a
Characteristics of proposed development (including demolition, construction, operation, or decommissioning):		
(a) The size and design of the whole of the proposed development (including any demolition works):	The project is approximately 0.08ha in area.	
(b) Other existing or permitted projects (including under other legislation that is subject to EIA) that could give rise to cumulative effects:	Due to its nature and scale, there are no characteristics that have the potential to cause environmental impacts that could be significant when combined with impacts from other existing or permitted developments.	
(c) Use of natural resources, in particular land, soil, water and biodiversity: <i>Will construction or the operation of the proposal use natural resources such as land, soil, water, materials or energy, especially any resources which are non-renewable or are in short supply?</i>	No significant natural resources will be used. Minor amounts of water and fuel will be used to clean and fuel machinery during construction.	
(d) Production of waste:	No significant waste streams will be generated as the site is small. Limited waste from construction processes will be disposed of in accordance with guidelines outlined in the oCEMP (ABN, 2021).	

² Relevant assessments are those which have a significant bearing on the project.

<p><i>Will the proposal produce solid wastes during construction, operation, or decommissioning?</i></p>	
<p>(e) Pollution and nuisances:</p> <p><i>Will the proposal release pollutants to ground or surface water, or air (including noise and vibrations) or water, or lead to exceeding environmental standards set out in other Directives?</i></p>	<p>Potential dust and noise pollution during construction. No significant pollution or nuisances will be caused after construction.</p> <p>Foul water discharge will connect to existing services on-site and will be conveyed to Barnageeragh (Skerries) Wastewater Treatment Plant (IETP_722) for treatment. This facility provides secondary treatment and according to the most recent Annual Environmental Monitoring Report (Irish Water, 2020) the plant is within its design capacity and compliant with environmental standards.</p>
<p>(f) Major accidents and disasters:</p> <p><i>In accordance with scientific knowledge, is there a risk of major accidents and/or disasters which are relevant to the project, including those caused by climate change?</i></p>	<p>There is no significant potential for the proposed development to give rise to significant adverse effects on the environment due to accidents and/or disasters. This applies to accidents/disasters arising from external factors as well as accidents arising from the development.</p>
<p>(g) Risks to human health, for example due to water contamination or air pollution:</p>	<p>No.</p>
<p>Location of proposed development:</p>	
<p>(a) Generally describe the location of the site and its surroundings:</p>	<p>The proposed project site is located within the Skerries Mills tourism attraction in a semi-urban context and is adjacent to parkland and sports pitches that are used for amenity and recreational purposes. The town of Skerries is located approximately 500m to the east of the site. Residential housing occurs outside of the Skerries Mills' boundaries to the south and west.</p>
<p>(b) Is the project located within, close to or has it the potential to impact on any site specified in Article 103(3)(a)(v) of the Regulations:</p> <ul style="list-style-type: none"> - European site - NHA/pNHA - Designated Nature Reserve - Designated refuge for flora or fauna - Place, site or feature of ecological interest, the preservation, conservation, protection of which is an objective of a development plan/ local area plan/ draft plan or variation of a plan. 	<p>The nearest designated site is the Skerries Islands SPA/NHA which is approximately 980m east of the project site. The townland of Skerries is situated between the proposed project and the Skerries Islands SPA/NHA.</p> <p>There are no other important designated sites with significant connectivity pathways to the proposed project site</p> <p>See accompanying AA Screening Report.</p>
<p>(c) Are there any other areas on or around the location that are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies (including riparian areas and river mouths), the coastal zone and the marine environment,</p>	<p>No. There are no ecologically sensitive areas on or around the site location that could be affected by the project. Adjacent areas include intensively managed grasslands and residential urban environments.</p>

mountains, forests or woodlands, that could be affected by the project?		
(d) Is the proposal likely to be highly visible to many people? Are there any areas or features of high landscape or scenic value on or around the location, or are there any routes or facilities that are used by the public for recreation or other facilities which could be affected by the proposal?	No. The project will be visible to people within the parkland and recreational sports pitches areas. There are no areas/features of high landscape or scenic value near the location that would be affected by the proposal.	
(e) Are there any areas or features of historic or cultural importance on or around the location that could be affected by the project?	The Skerries Mills tourism attraction has historic and cultural importance. However, adequate construction control measures will be implemented to ensure the Skerries Mills will not be adversely affected by the project. On the contrary, once the project is completed, the historical and cultural value would be increased.	
(f) Are there areas within or around the location which are densely populated or built-up, or occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities that could be affected by the proposal?	The site is adjacent to amenity parkland and recreational sports pitches. Residential dwellings are located to the south and west of the amenity parklands that surround Skerries Mills. The townland of Skerries is situated to the east of Skerries Mills and has a population of approximately 10,000.	
(g) Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the proposal?	The bedrock underlying the site is classified as "Locally Important Aquifer – Kartsified. The groundwater vulnerability is "Not at risk" according to the Water Framework Directive.	
(h) Are there any areas within or around the location which are already subject to pollution or environmental damage, and where there has already been a failure in environmental standards that could be affected by the proposal e.g. the status of water bodies under the Water Framework Directive?	No. The Water Framework Directive groundwater quality status is "Good". The Mill Stream which flows through Skerries Mills has an "Unassigned" status.	
(i) Is the site located in an area susceptible to subsidence, landslides, erosion, or flooding which could cause the proposal to present environmental problems?	No.	
(j) Are there any additional considerations that are specific to this location?	No.	
Types and characteristics of potential impacts:		
If relevant, briefly describe the characteristics of the potential impacts under the headings below.	If relevant, briefly describe any mitigation measures proposed to avoid or prevent a significant effect.	Is this likely to result in significant effects on the environment?

<i>Population and human health:</i>		
There may be possible short-term nuisances to human beings from noise and dust during the construction phase. Noise and dust or pollution will be subject to standard mitigation measures as per typical construction projects.	Mitigation measures will be implemented as outlined in the oCEMP (ABN, 2021).	No. The impacts from noise and dust will be temporary and are not significant.
<i>Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive.³ *</i>		
The site does not contain and is not adjacent to any habitats protected under the Habitats Directive. The bird species listed as qualifying interests of the nearby Skerries Islands SPA or other relevant SPA sites will not be affected.	Light-bellied Brent geese use short grassland for foraging opportunities and are listed as qualifying interests of the Skerries Islands SPA. These birds migrate to Ireland for the winter months. There is no potential foraging habitat within the study site and no known records of the species regularly occurring in the wider Skerries Mills complex.	No.
<i>Land, soil, water, air and climate:</i>		
There will be no loss of land as construction will take place in the footprint of the current Red Barn building. There is potential risk to water quality of the Mill Stream.	Sources of water pollution will be managed in accordance with the mitigation measures outlined in the oCEMP (ABN, 2021).	No. The effects will be low due to the mitigation measures that will be implemented.
<i>Material assets, cultural heritage and the landscape:*</i>		
The nature, scale and context of the project is considered to be too small to have significant impacts on the wider landscape. The historically valuable buildings adjacent to the proposed project site.	No mitigation proposed for the buildings with cultural heritage value. Buildings will be retained in situ and are not proposed for any works	No.
<i>Cumulative effects:</i>		
No cumulative effects are identified.	N/A	No.
<i>Transboundary effects:</i>		
The Mill Stream is located to the south of the proposed project site and is a potential pathway for pollution.	Surface water runoff and sources of contaminants during construction will be addressed	No. The residual risk is low once mitigation measures are implemented.

³ -And with particular regard to areas specified in Article 103(3)(a)(v) of the Regulations.

	via mitigation measures outlined in the oCEMP (ABN, 2021).	
1. Additional Considerations:		
Further relevant information, if any, relating to how the results of any other relevant assessments of the effects on the environment have been taken into account (e.g. SEA, AA screening, AA):	n/a	
Determination:		
No real likelihood of significant effects on the environment.	✓	EIAR is not required
Real likelihood of significant effects on the environment.		EIAR is required

Main Reasons and Considerations:

This EIA Screening Report has described and considered the nature and scale of the proposed works and the local environmental context in which the proposed works will occur.

Having regard to the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, it is considered that the proposed development **would not** be likely to have significant effects on the environment and that the preparation and submission of an environmental impact report (EIAR) is not therefore required.

3 EIA Screening Conclusion

This EIA Screening Report has been carried out based on the best available scientific information and data, an ecological site walkover and project details provided by ABN Consultants and Fingal County Council.

This report has described and considered the nature and scale of the proposed works and the local environmental context in which the proposed works will occur.

Having regard to the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, it is considered that the proposed development **would not** be likely to have significant effects on the environment and that the preparation and submission of an environmental impact report (EIAR) is not therefore required.

4 References

CIRIA (2001). Control of Water Pollution from Construction Sites, Good Practice Guidelines (CIRIA C532).

Office of Planning Regulator (OPR) (2021). Practice Note PN02 - Environmental Impact Assessment Screening.

Appendix A – Photographic Record



A1. Front (west) elevation of target structure.



A2. Rear (east) elevation of target structure.



A3. Tourism buildings adjacent to target structure.



A4. Southern elevation of target structure with associated tourism buildings.



A5. Mill Stream with low water levels and dense vegetation.



A6. Southern view of target structure with Mill Stream visible on right side.



A7. Mill Stream view immediately south of target structure.



A8. View of Mill Stream downstream from site with amenity parkland on either side.

Appendix B - Proposed Layout

