

Kildare County Council Storage Facility  
at Military Road Industrial Park

**Kildare County Council Storage  
Facility at Military Road Industrial  
Park, Naas Co. Kildare  
Screening Report for  
EU Natural Habitats Directive  
Appropriate Assessment**

on behalf of  
Kildare Co. Council

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## 1.0 Introduction

Kildare County Council is proposing to develop a 1,917 square metres Storage Facility at Military Road Industrial Park, Naas, Co. Kildare. Pursuant to proper planning and development Kildare County Council ensures all proposals/projects are screened to avoid significant impacts on Natura 2000 sites in accordance with Article 6 of the Habitats Directive.

The purpose of this assessment is to determine, the appropriateness, or otherwise, of the proposed project in the context of the conservation objectives of sites which are protected for their natural habitats and species under European legislation, termed Natura 2000 sites.

## 2.0 Process

Ireland became a signatory to the EU Birds Directive in 1979 and the Habitats Directive in 1992. Arising from this legislation was the obligation to establish the Natura 2000 network: nominated sites of highest biodiversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SACs, including candidate SACs), and Special Protection Areas (SPAs, including proposed SPAs).

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the protection of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the qualifying interests of the sites; from these the conservation objectives of the site are derived.

The requirements for an Appropriate Assessments (AA) are fully set out in the EU Habitats Directive 92/43/EEC. Articles 6(3) and 6(4) of this Directive state:

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

6.4. If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where a site that is impacted upon by a proposed development hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

The Department of the Environment, Heritage and Local Government (DoEHLG) issued guidance on Appropriate Assessment (*Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities*) in December 2009 which provided advice on the information required in an Appropriate Assessment. Guidance from DoEHLG published in February 2010 stated that it is the responsibility of the competent authority (or consent authority) to undertake the Appropriate Assessment. The assessments may be based on information submitted by the proponent of the plan or project, in the form of a Natura Impact Statement. This Natura Impact Statement must be prepared by an ecological specialist with input from other relevant disciplines as required experts, e.g. engineers, planning specialists, hydrologists.

This screening assessment has been prepared in accordance with the current guidance (NPWS, 2009, Revised February 2010).

### **3.0 Stages of the Appropriate Assessment**

This document has been prepared in accordance with the European Commission Environment DG document "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", referred to as the "EC Article 6 Guidance Document". The guidance document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive, and is viewed as an interpretation of the EU Commission's document "Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC", referred to as "MN2000". In addition, "Appropriate Assessment Guidance for Planning Authorities" was published by the Department of the Environment, Heritage and Local Government in December 2009 (DEHLG, 2009) and amended in March 2010. Cognisance has been taken of this document in carrying out this screening assessment.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the plan should aim to avoid any negative impacts on European sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts. Following that, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then it is rejected. If no alternative solutions are identified and the plan 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 effect.

#### **Screening Phase**

This section of the screening process describes the Natura 2000 sites within a 15km radius of the proposed Storage Facility at Military Road Industrial Park, Naas, Co. Kildare. A 15km buffer zone has been chosen as a precautionary measure, to ensure that all potentially affected Natura 2000 sites (i.e. European Sites) are included in the screening process. This is in line with "Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities", produced by the Department of the Environment, Heritage and Local Government.

The integrity of a Natura 2000 site (referred to in Article 6.3 of the EU Habitats Directive) is determined based on the conservation status of the qualifying

features of the SAC. The qualifying features for each site have been obtained through a review of online documentation relating to each Natura 2000 site available from the NPWS.

There are no European Sites located within the area including the area of the proposed Storage Facility at Military Road Industrial Park, Naas, Co. Kildare is og, Special Area of Conservation (SAC) is the nearest European site at circa 9km from the proposed development site. Table 1 lists the Natura 2000 sites within *circa* 15km of the proposed Storage Facility at Military Road Industrial Park, Naas, Co. Kildare.

#### **4.0 Description of the Project and whether is it required for proper management of an European Site**

The project involves renovation of existing warehouse/industrial building for use by Kildare County Council as a Storage Facility. The works consist of a large storage area with small associated storage facilities with associated staff amenities totalling 1,917 sq.m. The development will also include the installation of 200 sq.m. of solar PV subject to detail design to the roof. Elevation changes are also required to accommodate the new internal layout with all associated works and services above and below ground to link the building with the existing Kildare County Council car park.

The project as outlined is not required for the proper management of a European Site i.e. an SAC or SPA site.

The project involves the proposed upgrade of an existing disused structure /storage facility Mill/Factory building, for the use and accommodation of a large file storage area, miscellaneous storage rooms and associated staff amenities.

Site location map and layout floor plan and elevation is included as Appendix 2.

The proposed works will include the stone building renovation and interior modification, exterior decoration and all associated site works.

The works on the site are principally interior re-modelling and decoration and a minor amount of exterior remodelling and decoration.

It is likely the construction of the disused stone structure and extension will take 52 weeks from starting on site to completion.

Any surface water drainage which may be necessary will be attenuated on site and discharged to on site existing greywater drainage

The construction at the site will involve the import of construction materials, concrete, tarmac and vehicle and machinery operation onsite.

Landscaping will only use clean uncontaminated topsoil or topsoil sourced from bio secure topsoil sources.

Minor scrub clearance may be required in vicinity of site, this will not occur within the bird breeding season of 1<sup>st</sup> of March to 1st of September

Planting schemes will not include any known invasive alien species as defined by Invasive Species Ireland.

It is recommended that a survey for roosting bats is carried out prior to any summer works on site.

### **Receiving Environment-Terrestrial Habitats**

The proposed disused stone structure upgrade is located adjacent to the Kildare County Council main offices, and car parking facilities.

The site comprises a disused structure and some scrub, and is traversed by a concrete path.

No annexed habitats occur within the footprint of the development.

The proposed disused stone structure Upgrade is located at least 8.5 kilometres from nearest SAC

A site visits were carried out in February 2020.

### **Habitats of the proposed Mill House Upgrade**

The habitats of the development site are entirely of an urban character

### **Ecological Value**

The site is highly modified and urban with derelict buildings and walls and a small area of scrub of low ecological value.

### **Annexed Habitats**

Annexed habitats do not occur in the area of proposed works.

### **Overall Ecological Value**

The location of the proposed Storage Facility at Military Road Industrial Park, Naas, Co. Kildare is in highly modified area of the site which is managed as amenity grassland which is of low habitat and species diversity and of low ecological interest.

However, it is recommended that a survey for roosting bats is carried out prior to any works on site.

### **Annexed Habitats**

Annexed habitats do not occur in the area of proposed works.

## **5.0 Sources for Information on Natura 2000 sites to Inform Screening Process**

### **5.1 Nature Conservation Sites and Available Information**

Data and information about European sites, and other nature conservation sites, were acquired from [www.npws.ie](http://www.npws.ie). This includes site boundaries, site synopses, lists of qualifying interests (SACs) and special conservation interests (SPAs), and conservation objectives (European sites).

European sites have site specific conservation objectives, and the associated supporting documents were sourced from the NPWS website.

- National Biodiversity Data Centre Website.
- EISs, NISs and other reports for projects in the general area, including previous Natura 2000 Screening Reports for Aras Cill Dara area held by Kildare County Council.
- Kildare County Development Plan.
- Geological Survey of Ireland Website
- **REFERENCES**
- Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, 2009.
- 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 Environment DG, 2000.
- Fossitt, J. A. (2000) A Guide to the Habitats of Ireland. The Heritage Council, Ireland.
- Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC: European Commission, 2000

## **6.0 Features of the Development that Could Impact on Natura 2000 Sites**

### **6.1 Brief Outline of the Natura 2000 Sites and Qualifying Interests**

This section of the screening process describes the 8 Natura 2000 sites which occur within a 15km radius of the proposed development area. A 15km buffer zone was chosen as a precautionary measure, to ensure that all potentially affected Natura 2000 sites are included in the screening process (Table 1).

All potentially affected Natura 200 sites, numbering 8, withing a 15m radius of the proposed site are delineated in a map see Appendix 2.

**Table 1. Natura 2000 sites within 15km of Proposed Storage Facility at Military Road Industrial Park, Naas, Co. Kildare.**

<b>Site Name (code)</b>	<b>Qualifying Interests Habitats and Species</b>	<b>Minimum Distance from Storage Facility at Military Road Industrial Park (km)</b>
Pollardstown Fen SAC Site Code 000396	Annex I - priority habitat <ul style="list-style-type: none"> <li>- Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210]</li> <li>- Petrifying springs with tufa formation (Cratoneurion) [7220]</li> <li>- Alkaline fens [7230]</li> </ul> Annex II- species <ul style="list-style-type: none"> <li>- Vertigo geyeri [1013]</li> <li>- Vertigo angustior [1014]</li> <li>- Vertigo moulinsiana [1016]</li> </ul> <ul style="list-style-type: none"> <li>- Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210]</li> <li>- Petrifying springs with tufa formation (Cratoneurion) [7220]</li> <li>- Alkaline fens [7230]</li> </ul>	13.5km
Mouds Bog SAC Site Code 002331	Annex I - priority habitat <ul style="list-style-type: none"> <li>- Active raised bogs [7110];</li> </ul> Annex I -habitats <ul style="list-style-type: none"> <li>- Degraded raised bogs still capable of natural regeneration [7120]; and</li> <li>- Depressions on peat substrates of the Rhynchosporion [7150].</li> </ul>	12.8km
Ballynafagh Lake SAC Site Code 001387	Annex I - priority habitat <ul style="list-style-type: none"> <li>- Alkaline fens [7230]</li> </ul> Annex II- species <ul style="list-style-type: none"> <li>- Vertigo moulinsiana [1016]</li> <li>- Euphydryas (Eurodryas, Hypodryas) aurinia [1065]</li> </ul>	12.5km
Ballynafagh Bog SAC Site Code 000391	Annex I - priority habitat <ul style="list-style-type: none"> <li>- Active raised bogs [7110];</li> </ul> Annex I -habitats <ul style="list-style-type: none"> <li>- Degraded raised bogs still capable of natural regeneration [7120]; and</li> <li>- Depressions on peat substrates of the Rhynchosporion [7150].</li> </ul>	12.7km



Red Bog SAC Site Code 000397	Annex I-habitats 7140 Transition mires and quaking bogs	8.9km
Poulphouca Reservoir SPA Site Code 004063	Greylag Goose ( <i>Anser anser</i> ) [A043] Lesser Black-backed Gull ( <i>Larus fuscus</i> ) [A183]	13.5km
Wicklow Mountains National Park SPA 004040	<ul style="list-style-type: none"> <li>• Merlin (<i>Falco columbarius</i>) [A098]</li> <li>• Peregrine (<i>Falco peregrinus</i>) [A103]</li> </ul>	14.5km
Wicklow Mountains SAC Site Code (002122)	<ul style="list-style-type: none"> <li>• Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea [3130]</li> <li>• Natural dystrophic lakes and ponds [3160]</li> <li>• Northern Atlantic wet heaths with Erica tetralix [4010]</li> <li>• European dry heaths [4030]</li> <li>• Alpine and Boreal heaths [4060]</li> <li>• Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)* [6230]</li> <li>• Blanket bog (*active only) [7130]</li> <li>• Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]</li> <li>• Calcareous rocky slopes with chasmophytic vegetation [8210]</li> <li>• Siliceous rocky slopes with chasmophytic vegetation [8220]</li> <li>• Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in British Isles [91A0]</li> </ul>	14.8km

## 6.2 Conservation Objectives

A Natura 2000 site's conservation objectives are defined by DAHG and are, "intended to ensure that the relevant Annex I habitats and Annex II species present on a site are maintained in a favourable condition" (DEHLG, 2010). The DEHLG guidelines state that, "The Conservation Objectives derive from the qualifying interests, the Natura 2000 standard data form, and the management plan for the site, with summary information also available in the site synopsis." Whilst the Natura 2000 standard data forms and site synopses do present details of the qualifying features of Natura 2000 sites, and list the generic threats to those features, they do not define the conservation objectives of the site.

For the purposes of this assessment, information on the conservation objectives for the sites has been gained from consultation with NPWS relating to the Border Regional Planning Guidelines and NPWS generic Conservation Objectives for Natura 2000 Sites where no Management Plan is yet available.

Generic conservation objectives for SPAs are as follows:

- To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.

Generic conservation objectives for SACs are as follows:

- To maintain Annex I habitats and Annex II species for which the cSAC has been selected at favourable conservation status;
- To maintain the extent species richness and biodiversity of the entire site; and
- To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

The favourable conservation status of a species can be described as being achieved when: population data on the species concerned indicate that it is maintaining itself, and 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.

Favourable conservation status of a habitat can be described as being achieved when: its natural range, and area it covers within that range, is stable or increasing, and the ecological factors that 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.

## 6.3 Relevant SACs Descriptions and Potential Impact

Mouds Bog SAC

Mouds Bog SAC is located approximately 12.8km to the south west of the proposed development site. Storage Facility at Military Road Industrial Park is located in the Liffey River Catchment. The majority of Mouds Bog SAC is also in the Liffey River Catchment but is significantly upstream of Storage Facility at Military Road Industrial Park and therefore there is no direct catchment connectivity from this site to the proposed development site. Mouds Bog SAC is a ground water dependent ecosystem but due to the significant distance sub-surface topography and surface geomorphology isolating the sites from one

another any potential development in the Storage Facility at Military Road Industrial Park is highly unlikely to impact on the groundwater regime of Mouds Bog SAC and therefore will not impact on the integrity of the SACs or the habitats for which they are designated. There will be no direct loss of habitat or species due to site works located at such a significant distance from this site.

#### Pollardstown Fen SAC

Pollardstown Fen SAC is located *circa* 13.5 km south west from the proposed Storage Facility at Military Road Industrial Park. Pollardstown Fen SAC is a ground water dependent ecosystem and disruption to site hydrology is understood to be the most significant threat to this site. However, there is no direct groundwater hydrological link between the site of the proposed development and this SAC due to the significant distance, sub-surface topography and surface geomorphology isolating the sites from one another. It is in the Liffey Catchment and Pollardstown Fen is in the Barrow River Catchment as such there is no catchment linkage between the sites. Therefore it is envisaged there will be no hydrological disruption to the integrity of the SACs or the habitats or species for which they are designated and no significant impacts to habitats or species likely to occur as a result of the proposed development. There will be no direct loss of habitat or species due to site works located at such a significant distance from this site.

#### Ballynafagh Lake SAC

Ballynafagh Lake is located about km north of Storage Facility at Military Road Industrial Park in Co. Kildare, *circa* 12.5km from the proposed development site. It is a shallow alkaline lake with some emergent vegetation. The Blackwood Feeder, which connects Ballynafagh Lake to the Grand Canal, is also included in the site. Ballynafagh Bog SAC and Ballynafagh Lake SAC are all located in the Barrow River Catchment, and so have no direct catchment connectivity to the area, in the Liffey Catchment. Any potential development is highly unlikely to impact on the surface water or groundwater regime of these SACs and therefore will not impact on the integrity of the SACs or the habitats and species for which they are designated. There will be no direct loss of habitat or species due to site works located at such a significant distance from this site.

#### Ballynafagh Bog SAC

This site is a raised bog situated about 1 km west of Prosperous in Co. Kildare *circa* 12.7km from the proposed development site. The area is directly underlain by muddy, fossiliferous limestones, interbedded with calcareous shales. The subsoils are predominantly clay-rich tills. All are of low permeability. The site comprises a relatively small core of uncut high bog (approx. 70 ha), which is surrounded by a more extensive area of cutover bog (approx. 90 ha). The high bog area can be divided into a wet core of active bog which covers an area of 23 ha, surrounded by approximately 44 ha of degraded raised bog which is experiencing drying-out at present.

The proposed development site is located in the Liffey River Catchment. The majority of Ballynafagh Bog SAC is in the Barrow River Catchment but is and therefore there is no direct catchment connectivity from this site to the proposed development site. Ballynafagh Bog SAC is a ground water dependent ecosystem

but due to the significant distance sub-surface topography and surface geomorphology isolating the sites from one another any potential development is highly unlikely to impact on the groundwater regime of Ballynafagh Bog SAC and therefore will not impact on the integrity of the SACs or the habitats for which they are designated. There will be no direct loss of habitat or species due to site works located at such a significant distance from this site.

#### Red Bog SAC

This lake lies between morainic ridges north of Blessington *circa* 8.9km from the proposed development site. It is characterized by a dense growth of *Menyanthes trifoliata* (bogbean) which gives rise to extensive areas of floating vegetation or quaking bog as defined by the annexed habitat, 7140 Transition mires and quaking bogs. There is no direct catchment connectivity from this site to the proposed development site. Red Bog SAC is a ground water dependent ecosystem but due to the significant distance sub-surface topography and surface geomorphology isolating the sites from one another any potential development is highly unlikely to impact on the groundwater regime of Mouds Bog SAC and therefore will not impact on the integrity of the SACs or the habitats for which they are designated. There will be no direct loss of habitat or species due to site works located at such a significant distance from this site.

#### Poulaphouca Reservoir SPA

Poulaphouca Reservoir SPA is located *circa* 13.5km as the crow flies approximately from the proposed development. Due to the distance of the proposed development site to the reservoir, no impacts through direct or indirect disturbance of species and habitats will occur from development occurring through the proposed works. Also, due to the fact that the SPA is located upstream of the LAP lands, no potential impacts to water quality would be expected. There is no known usage of the proposed development site by birds for which the site is designated an SPA i.e. lesser black backed gulls and greylag geese. There will be no direct loss of habitat or species due to site works located at such a significant distance from this site.

#### Wicklow National Park SPA

This is an extensive upland site, comprising a substantial part of the Wicklow Mountains. Most of the site is in Co. Wicklow, but a small area lies in Co. Dublin. The site is located *circa* 14.5Km as the crow flies from the proposed development site. The underlying geology of the site is mainly of Leinster granites, flanked by Ordovician schists, mudstones and volcanics. The area was subject to glaciation and features fine examples of glacial lakes, deep valleys and moraines. Most of site is over 300 m, with much ground being over 600 m; the highest peak is Lugnaquilla (925 m). The substrate over much of site is peat, with poor mineral soil occurring on the slopes and lower ground. Exposed rock and scree are features of the site. The predominant habitats present are blanket bog, heaths and upland grassland.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Merlin and Peregrine.

A series of surveys of the Wicklow Mountains SPA indicates that up to 9 pairs of Merlin breed within the site in any one year. Traditionally a ground-nesting species, Merlin in the Wicklow Mountains are usually found nesting in old crows nests in conifer plantations. The open peatlands provide excellent foraging habitat for Merlin with small birds such as Meadow Pipit being their main prey. The cliffs and crags within the site also provide ideal breeding locations for

Peregrine (20 pairs in 2002). Other birds of the open peatlands and scree slopes that have been recorded within the site include Ring Ouzel and Red Grouse.

The Wicklow Mountains SPA is of high ornithological importance as it supports nationally important populations of Merlin and Peregrine, both species that are listed on Annex I of the E.U. Birds Directive. Part of Wicklow Mountains SPA is a Statutory Nature Reserve

This SPA site is not directly ecologically or hydrologically linked to the proposed development site and it is expected that no direct or indirect impact to this site will occur as a result of the proposed development. No species conserved for this site frequents the proposed development site.

#### Wicklow Mountains SAC

Wicklow Mountains SAC is a complex of upland areas in Counties Wicklow and Dublin, flanked by the Blessington reservoir to the west and Vartry reservoir in the east, Cruagh Mountain in the north and Lybagh Mountain in the south. The site is located *circa* 14.8Km as the crow flies from the proposed development site.

Most of the site is over 300 m, with much ground over 600 m. The highest peak is 925 m at Lugnaquilla.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (\* = priority; numbers in brackets are Natura 2000 codes):

[3110] Oligotrophic Waters containing very few minerals

[3160] Dystrophic Lakes

[4010] Wet Heath

[4030] Dry Heath

[4060] Alpine and Subalpine Heaths

[6130] Calaminarian Grassland

[6230] Species-rich Nardus Grassland\*

[7130] Blanket Bogs (Active)\*

[8110] Siliceous Scree

[8210] Calcareous Rocky Slopes

[8220] Siliceous Rocky Slopes

[91A0] Old Oak Woodlands

[1355] Otter (*Lutra lutra*)

This SAC site is not directly ecologically or hydrologically linked to the proposed development site and it is expected that no direct or indirect impact to this site will occur as a result of the proposed development of the Storage Facility at Military Road Industrial Park. No species conserved for this site frequents the proposed development site.

## **7.0 Likely Impact to the Natura 2000 Sites**

The possible impacts that might arise from the proposed development have been examined in the context of the factors that could potentially affect the integrity of the Natura 2000 sites. As part of the screening stage process the proximity and qualifying interests of the Natura 2000 sites in the wider hinterland of the proposed Storage Facility at Military Road Industrial Park were considered. In assessing the sites that could potentially be impacted by the proposed development a source-pathway-receptor model was used. All sites potentially impacted were considered in relation to the size and nature of the proposed development and the sensitivity of the receptors in the wider locality. If a Natura 2000 site of particular significance/relevance exists beyond a nominal screening area this was also included in the screening appraisal. Accordingly, all potential pathways for impact on designated sites were included in this screening exercise both within and outside a nominal 15km zone which was chosen to display the location and discuss sites most proximate to the proposed development. Table 2 summarises the location and qualifying interests of designated sites in the area.

### **7.1 SAC Sites**

The nearest SAC within the 15km distance from the proposed development site lies at a distance of 8.9km from the proposed site. In total 8 European sites occur within 15km and these sites are not hydrologically or directly linked by habitat connectivity to the area of the proposed development site at Aras Cill Dara, Naas. It is therefore highly improbable that a project of this nature and scale will have any measurable impact on the qualifying interests of these SACs i.e. Mouds Bog SAC, Pollardstown Fen SAC, Ballynafagh Lake SAC, Ballynafagh Bog SAC, Red Bog, Poulaphuca Reservoir SPA, Wicklow Mountains SPA, Wicklow Mountains SAC. For these European sites there will be no reduction in habitat area of qualifying interest, no disturbance to key species or habitats, no reduction in species density or no changes in key indicators of conservation value.

Table 1 summarises the location and qualifying interests of designated sites in the within a 15km radius of the proposed development site.

Table 2 outlines a screening matrix for potential impacts to the SAC sites.

All surface water and foul water on site are adequately treated and therefore no impact is envisaged for surface or ground water quality as a result of the proposed Storage Facility at Military Road Industrial Park, Naas, Co. Kildare.

**Table 2.**

	<b>Reduction in Habitat Area of Habitat of Qualifying Interest</b>	<b>Disturbance to Key Habitats or Species</b>	<b>Habitat or Species Fragmentation</b>	<b>Reduction in Species Density</b>	<b>Changes in Key Indicators of Conservation Value</b>
<b>Site Name</b>	<b>Possible Potential Impacts</b>	<b>Possible Potential Impacts</b>	<b>Possible Potential Impacts</b>	<b>Possible Potential Impacts</b>	<b>Possible Potential Impacts</b>
Pollardstown Fen SAC Site Code 000396	No	No	No	No	No
Mouds Bog SAC Site Code 002331	No	No	No	No	No
Ballynafagh Lake SAC Site Code 001387	No	No	No	No	No
Ballynafagh Bog SAC Site Code 000391	No	No	No	No	No
Red Bog SAC Site Code 000397	No	No	No	No	No
Poulaphouca Reservoir SPA Site Code 004063	No	No	No	No	No
Wicklow Mountains SPA Site Code 004040	No	No	No	No	No
Wicklow Mountains SAC Site Code 002122	No	No	No	No	No

### **Cumulative Impact**

A requirement of the AA process is to take into consideration any cumulative impacts as a result of other plans in the area. It is considered that because of the small scope and scale of the proposed development and the fact that it is highly unlikely to lead to any adverse impact to any Natura 2000 sites within a 15km radius of the site, that no cumulative impact will result from the proposed development in combination with any other proposals in the area.

## 8.0 Screening Conclusions

The likely impacts that will arise from the proposed development of works have been examined in the context of the key environmental factors that could potentially affect the integrity of the Natura 2000 network, e.g. disturbance, habitat loss, etc. and the results of the Screening Assessment, as presented in Tables 2. The tables indicate “no” for sites where no negative impact is anticipated on the conservation objectives or on the overall integrity of the site.

### Conclusion of screening stage

In conclusion, to determine the potential impacts, if any, of the proposed Kildare County Council Storage Facility at Military Road Industrial Park on nearby Natura 2000 sites, a screening process for AA was undertaken. The proposed development is located within 15km of 4 Natura 2000 sites.

It is considered that the proposed development does not include any element that has the potential to significantly alter the favourable conservation objectives associated with the species and habitats, or, interfere with the key relationships that define the structure or function, either alone or in combination of impacts, of the Natura 2000 sites considered in this document provided that the following is carried out:

The proposed development is completed as described in section 4.

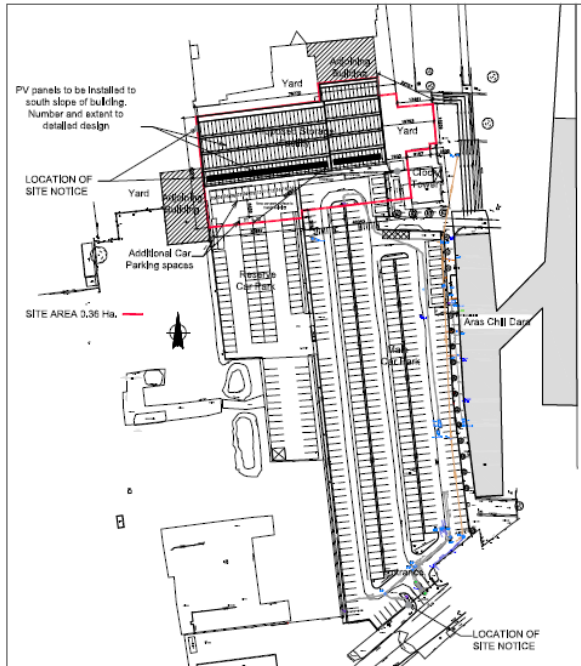
The programme of measures consistent with best practice, standards, design and controls as outlined in section 4 are implemented

It has been objectively concluded during the screening process that none of these sites are likely to be significantly impacted by the proposed Storage Facility at Military Road Industrial Park and these are:

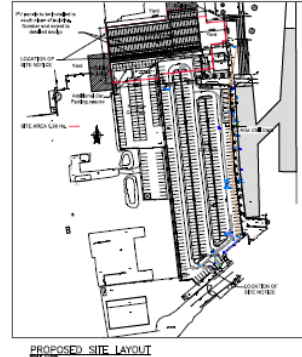
- Pollardstown Fen SAC Site Code 000396
- Mouds Bog SAC Site Code 002331
- Ballynafagh Lake SAC Site Code 001387
- Ballynafagh Bog SAC Site Code 000391
- Red Bog SAC Site Code 000397
- Poulaphuca Reservoir SPA Site Code 004063
- Wicklow Mountains SPA Site Code 004040
- Wicklow Mountains SAC Site Code 002122



## Appendix 1. Location, Elevation and layout of Proposed Kildare County Council Storage Facility at Military Road Industrial Park

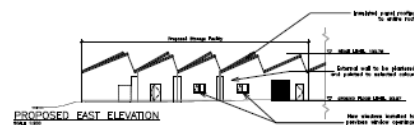
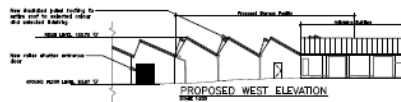
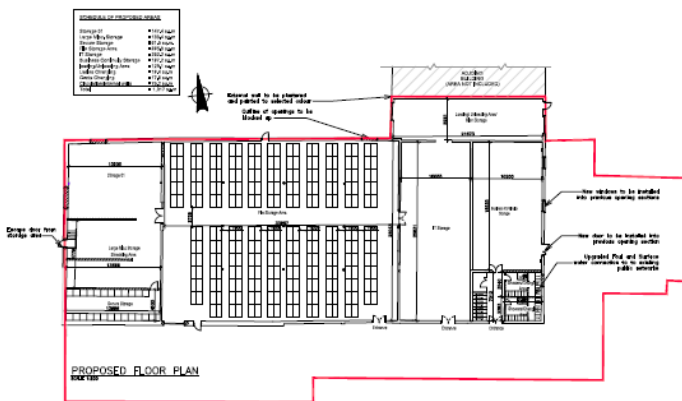


PROPOSED SITE LAYOUT



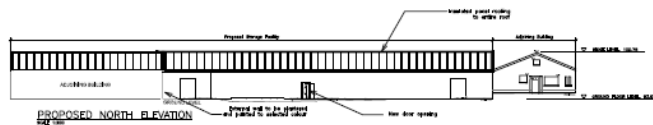
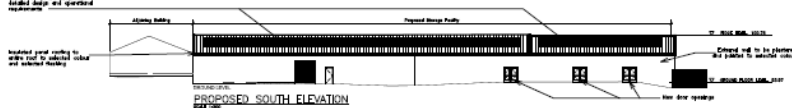
Part 8 Submission  
Ref No. PR2021.02

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Client:	...
Project:	...
Phase:	...
Revision:	...
Date:	...
Drawn by:	...
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Part 8 Submission  
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## Appendix 2

### Natura 2000 Sites within a 15km radius of the proposed development site



### **Appendix 3**

#### **Photographic Record of Proposed Kildare County Council Storage Facility at Military Road Industrial Park**

**View 1 of area of proposed Kildare County Council Storage Facility at Military Road Industrial Park development site**

**View 2 of area of proposed Kildare County Council Storage Facility at Military Road Industrial Park**