APPROPRIATE ASSESSMENT NATURA 2000 STATEMENT

Application for Proposed Inclusion of a Security Gate on the Timber Canopy Extension on Sceilg Mhichíl

Prepared on behalf of the Office of Public Works

by

Maurice O'Connor BSc, MSc., MCIEEM

Senior Environmental Project Manager

Envirico Ltd.

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ENVIRICO LTD
5A COURTHOUSE LANE, TRALEE, CO. KERRY

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1 Introduction and Project Rationale

1.1 Introduction

Envirico have been commissioned by Office of Public Works (OPW) to provide ecological consultancy services for the proposed installation of a security gate on the canopy extension at the Lighthouse Rd northeast of Cross Cove, Sceilg Mhichíl, Co. Kerry. A full description of the proposed works is detailed in Section 4.1.

In accordance with the EC Habitats Directive 92/43/EEC (hereafter 'The Habitats Directive') a Screening for Appropriate Assessment (AA) must be undertaken for all projects and/or plans to assess whether there is potential for Likely Significant Effects (LSEs) from the project or plan on European sites (Natura 2000 sites); comprising Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The proposed development site is located within the island of Sceilg Mhichíl, Co. Kerry, with the immediate surrounds typically made up of a landing pier, lighthouse road, timber crash deck on scaffold bars, associated sea wall, and coastal habitats. No surface water environments are within the project boundary.

1.2 Project Rationale

The proposed development consists of the installation of a security gate on the canopy extension on the lighthouse road, Sceilg Mhicíl. The canopy is a safety feature for human footfall on the island, situated on the main tourist route, which provides shelter from falling debris along the inner part of Cross Cove. A security gate is required to help prevent unauthorised access to the island.

1.3 Statement of Authority

This NIS Report has been prepared by Maurice O Connor, Environmental Consultant. Maurice holds BSc (Hons) degree in Wildlife Biology from Munster Technological University (MTU), MSc in Ecological Assessment from National University of Ireland Cork (UCC) and he is a full member of the Chartered Institute of Ecology and Environmental Management, (MCIEEM). Maurice is an experienced ecological consultant with over 10 years' professional experience in Ireland, working independently and within consultancy. He has strong generalist ecological field skills in terrestrial and riparian environments and through his experience can demonstrate undertaking a range of ecological surveys including habitat, invasive and protected species survey, delivering initial site appraisals and identification of ecological constraints to inform environmental reports including EIAR, EcIA, SEA and AA. Maurice has undertaken ecological assessments and surveys on a variety of project types involving survey, mitigation and enhancement. During his time as an environmental consultant, Maurice has completed numerous environmental assessments for both plans and projects.

2. The Appropriate Assessment Process

2.1 Legislative Context for Appropriate Assessment

Legislation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 437 of 2011) (as amended) transposes Article 6 of the Habitats Directive (92/43/EEC) into Irish law. The regulations require that where a public authority wishes to progress a project (which is not directly connected with or necessary to the management of the site as a European Site), a screening for Appropriate Assessment (AA) of the project must be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that project, individually or in combination with other plans or projects is likely to have a significant effect on the European site. AA screening is required under Article 6(3) of European Union Council Directive 92/43/EEC (also known as the Habitats Directive), section 177U of the Planning and Development Act 2000 to 2018 and amendments (Amendment of Part XAB (appropriate assessment)).

In accordance with the requirements of the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC), Member States have identified a network of sites of conservation importance, hosting habitats and/or species identified in the Directives as needing to be either maintained at or returned to favourable conservation status. These sites are known as the Natura 2000 network and in Ireland, Natura 2000 sites comprise areas designated as Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSACs), Special Protection Areas (SPAs) and candidate Special Protection Areas (cSPAs).

These Directives require that where a project is likely to have a significant effect on a Natura 2000 Site, while not directly connected with or necessary to the nature conservation management of the site, it shall be subject to 'Appropriate Assessment' to identify any implications for the site in view of the site's conservation objectives. Specifically, Article 6(3) of the Habitats Directive states:

"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".

Article 6(4) states:

"If, in spite of a negative assessment of the implications for the [Natura 2000] 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, Member States 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."

This screening for Appropriate Assessment has been carried out in accordance with the following European Commission Guidance:

EC (2000 & 2018) 'Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC';

EC (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';

NPWS, DEHLG (2009 & 2010). 'Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities'

European Commission (2006). 'Nature and Biodiversity Cases: Ruling of the European Court of Justice'.

2.2 Stages in Screening and Appropriate Assessment

Screening for Appropriate Assessment (AA) is one of four distinct stages of the appropriate assessment process, as outlined in the European Commission Guidance document (2001). Within these stages the potential of significant impacts/effects upon a Natura 2000 site will be assessed and detailed. The four stages of an AA are summarised below. Article 6(3) of the Habitats Directive, which details this assessment process, is implemented into law in Ireland through the provisions of Sections 177U and 177V of the 'Planning and Development Act 2000 to 2018'.

All potential effects between activities associated with the proposed development and the ecological components of European sites must be considered. This includes potential effects on mobile species notably, birds, mammals, invertebrates, and migratory fish.

If the prospect of LSEs occurring cannot be excluded on the basis of objective information, the project is taken forward to the next stage of the process, Appropriate Assessment. At Screening, the burden of evidence is to show, on the basis of objective information, and beyond reasonable scientific doubt, that the project will have no LSEs on a European site. If the effect may be significant, or is not known, it would trigger the need for Appropriate Assessment. The entire process can be broken down into four stages (EC, 2001), as outlined below:

Stage 1 - Screening: Screening for an AA, in relation to the construction, management/operation and decommissioning of a specific proposed plan or project, shall be completed in order to assess whether said development, either individually or in combination with others, is likely to have a significant effect upon Natura 2000 sites locally, regionally or nationally, in view of these site's conservation objectives.

Stage 2 - Appropriate Assessment: The competent authority detailing the AA shall, under Article 6(3) and Section 177V of the 'Planning and Development Act 2000 to 2018', make a decision as to whether or not the proposed development would affect or impact upon the integrity of a Natura 2000 site. Where there are adverse effects on site integrity identified, mitigation measures are proposed, as appropriate, to avoid adverse effects, and as such a Natura Impact Statement is then required. For projects, the AA process is documented within a Natura Impact Statement (NIS). This is provided to the competent authority by the applicant, to facilitate an informed assessment of the project.

Stage 3 - Assessment of Alternative Solutions: If following AA, including proposal of mitigation, adverse effects on site integrity remain, or uncertainty remains, an Assessment of Alternatives is required. This process examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site.

Stage 4 - Assessment where no alternative solutions exist: Where alternative solutions, locations, etc. are absent, or if such solutions are likely to have increased levels of impact upon Natura 2000 sites, the competent authority must establish whether or not the plan or project can be considered as necessary for Imperative Reasons of overriding public interest (IROPI).

2.3 The Likely Significant Effect test

Screening is underpinned by an interpretation of Likely Significant Effect (LSE), as this interpretation provides the benchmark for a finding of likely effects. Any assessment of significance must satisfy the principles that underpin a satisfactory determination for LSE with regard to the accumulation of impacts and an understanding of the nature, probability and severity of potential impacts. The terms 'likely' and 'significance' have been defined variously by governments and through the courts. The following sections seek to provide clarification on the current interpretation of these key terms as determined by recent guidance and case law.

2.3.1 An interpretation of 'likely'

European case law has established that the benchmark requirement of 'likely' should not be regarded as a measure of probability in the context of an AA. Rather, a LSE finding is an acknowledgment that the risk of a significant effect occurring exists. This approach is consistent with the findings in the

Waddenzee judgement, which found that "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on that site" then a LSE finding is appropriate.

More recently, this position was upheld in the European Court of Justice (ECJ) in Case C-258/11 (Sweetman v An Bord Pleanála (Ireland), where the judgment interprets "likely" to mean "may"; "the test is set at a lower level" and "there is no need to establish such an effect; it is merely necessary to determine that there may be such an effect". In cases where there is a determination that there is no significant effect, the Waddenzee judgment establishes that there must remain "no reasonable scientific doubt as to the absence of such effects."

2.3.2 An interpretation of 'significant'

It was clarified in the ECJ Case C-127/02 (the Waddenzee judgment) that the measure of significance should be made against the ecological objectives for which the site was designated: "where a plan or project is likely to undermine the site's conservation objectives, it must be considered likely to have a significant effect on that site".

The proposed works are not directly connected with or necessary to the management of any European site therefore Screening for AA is required. This involves the following:

- Proposed development description
- European site(s) identification, qualifying interests and conservation objectives
- Ecology baseline conditions within and in close proximity to proposed development
- Assessment of likely effects
- Screening conclusion

3. Screening Methodology

3.1 Desktop review

An ecological desk review was undertaken on the 26th of May 2025 in order to assess the potential impacts of the proposed project, as detailed in Section 4.5 of this document. The purpose of this review is to collate available data and information relating to the site and relevant Natura 2000 sites. Within this review, sources, publications, and datasets that were consulted included.

- Aerial photography and 1:50000 mapping
- National Parks and Wildlife Service (NPWS)
- Details and qualifying interests of European sites
- Conservation Status Assessment Reports [1] (CSARs), Backing Documents and Maps prepared in accordance with Article 17 of the Habitats Directive
- Published and unpublished NPWS reports on protected habitats and species including Irish Wildlife Manual reports, Species Action Plans, and Conservation Management Plans
- Existing relevant mapping and databases e.g. waterbody status, species and habitat distribution etc. (sourced from the Environmental Protection Agency - http://gis.epa.ie/, the National Biodiversity Data Centre - http://maps.biodiversityireland.ie and the National Parks and Wildlife Services - http://www.npws.ie/mapsanddata/)

3.1.1 Zone of Influence (ZoI)

DHLGH Guidance states that screening for Appropriate Assessment should be carried out for any European site within the likely Zone of Influence of a plan or project. For projects, the guidance recommends that the Zone of Influence must be evaluated on a case-by-case basis regarding the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects. Projects have the potential to impact on European sites beyond the confines of the individual sites themselves.

The Zone of Influence of a project is the area in which qualifying interests are present which are sensitive to the ecological impacts that may be caused by the activities associated with the project. The zone of influence will therefore vary relative to the scale of the impact and relative to the ecology of the sensitive receptor.

The potential Zone of Influence is defined as:

- Areas directly within the land take for the proposed development

- Areas which will be temporarily affected
- Areas likely to be impacted by hydrological disruption
- Areas where there is a risk of pollution and disturbance (e.g. noise)

To establish the zone of influence, nationally available data on protected habitats and species was mapped using GIS. This data was interrogated for any physical, hydrological, or ecological connectivity to the activities associated with the proposed CCTV installation works.

3.1.2 European Sites within Zone of Influence

The Skelligs SPA (004007) is the only Natura 2000 site within the Zone of Influence, this being the area within which there is potential for impacts from the project works. Further Natura 2000 sites within a 15km radius are detailed in Table 1 below. These sites have been assessed for ecological connectivity with the project. Owing to small scale of the project, the remote island nature of the site and lack of connectivity there is no potential for likely significant effect to the other Natura 2000 sites in the wider environment.

Table 1 Natura 2000 sites within 15km

Natura 2000 Site	Site Code	Distance from Works (Km)
Valencia Harbour/Portmagee Channel SAC	002262	14
Puffin Island SPA	004003	11
Skelligs SPA	004007	0
Iveragh Peninsula SPA	004154	13

Qualifying features of the Skelligs SPA (004007) are presented in Table 2 below and a location map is presented below

Table 2 Skelligs SPA (004007) Special Conservation Interests (SCIs)

Special Conservation Interests of Skelligs SPA	Species Code
Fulmar (*Fulmarus glacialis*)	[A009]
Manx Shearwater (*Puffinus puffinus*)	[A013]
Storm Petrel (*Hydrobates pelagicus*)	[A014]
Gannet (*Morus bassanus*)	[A016]
Kittiwake (*Rissa tridactyla*)	[A188]
Guillemot (*Uria aalge*)	[A199]
Puffin (*Fratercula arctica*)	[A204]

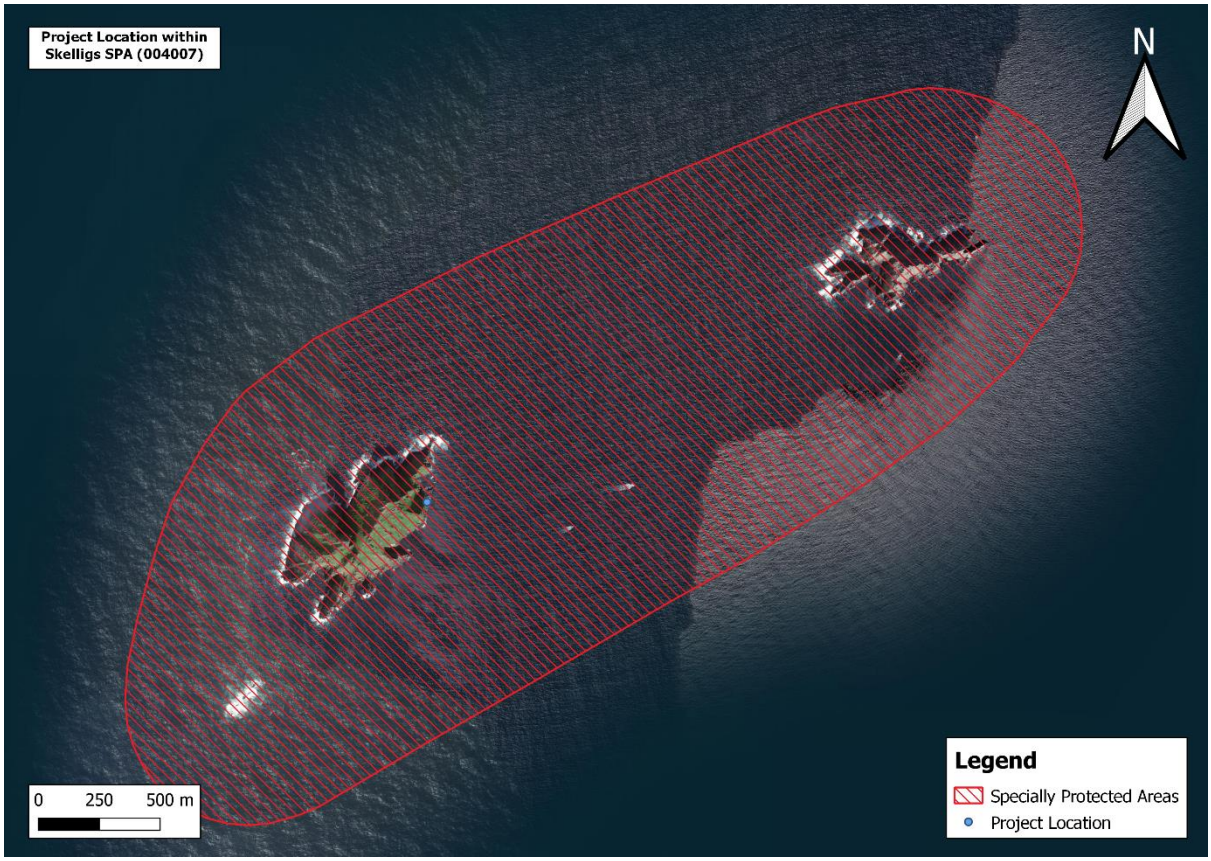

Figure 1: Location of the proposed development within Skelligs SPA (004007)

The site comprises Great Skellig and Little Skellig islands. These highly exposed and isolated islands, which are separated by a distance of 3 km, are located in the Atlantic some 14 km and 11 km (respectively) off the County Kerry mainland. The geology of the islands is of Old Red Sandstone, with a little slate and veins of white quartzite. Both islands are precipitous rocky sea stacks, Great Skellig rising to 218 m and Little Skellig to 134 m. Great Skellig supports a sparse maritime flora on shallow soils. Common plant species include Thrift (*Armeria maritima*), Sea Campion (*Silene maritima*) and Rock Sea-spurrey (*Spergularia rupicola*), with patches of Red Fescue (*Festuca rubra*), Dock (*Rumex sp*.) and Sea Mayweed (*Matricaria maritima*) occurring frequently. Its lichen flora is notable for the number of rarities that occur, including several species not recorded elsewhere in Ireland. Little Skellig is largely unvegetated, due both to the low soil cover and to the effect that the nesting birds have on the vegetation. However, Sea Mayweed occurs on ledges that are too small for Gannets, and Tree Mallow (*Lavatera arborea*), a local species in Ireland, has been recorded. The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Fulmar, Manx Shearwater, Storm Petrel, Gannet, Kittiwake, Guillemot and Puffin. It is also of special conservation interest for holding an assemblage of over 20,000 breeding seabirds. The Skelligs comprise one of the most important seabird colonies in the country for populations and species diversity. Great Skellig has an internationally important population of Storm Petrel (9,994 pairs in

2002), with birds nesting both in the stonework associated with the monastic settlement and in natural crevices amongst the scree and rock. Little Skellig is best known for its long established and internationally important Gannet colony, with 29,683 pairs in the last full census in 2004. This is by far the largest colony in Ireland and one of the largest in the world. Great Skellig also has one of the largest Puffin colonies in the country, with 6,000 pairs estimated in 2002. Other seabird species which occur on the islands in nationally important numbers are as follows: Fulmar (830 pairs), Manx Shearwater (902 pairs), Kittiwake (1,035 pairs) and Guillemot (1,652 pairs) – all data from 2002. Razorbill (283 pairs - five year mean between 1998 and 2002) occur but below the threshold of national importance. Great Skellig is a traditional site for Chough, though the relatively small size of the island supports only one nesting pair. Peregrine has also nested in some years. The breeding seabirds on the Skelligs have been fairly well documented over the years, with references to the Gannets dating back to the 1700s. Owing to the high importance of the islands for birds, each has been designated a Statutory Nature Reserve. In addition, the non-governmental organisation, Bird Watch Ireland, holds a long-term lease on Little Skellig. This site is one of the top five seabird sites in the country and is of international importance on account of both the assemblage of over 10,000 pairs of breeding seabirds and the individual populations of Storm Petrel and Gannet. The site also holds nationally important populations of a further five species of breeding seabird. Also of note is the regular presence of three species, Storm Petrel, Chough and Peregrine, which are listed on Annex I of the E.U. Birds Directive.

4 Screening for Appropriate Assessment

4.1 Description of Project

The proposed development consists of the installation of a removeable security gate which will be clamped on to the scaffold structure of the second to last bay of the canopy extension east of Cross Cove along the lighthouse road on the main tourist route on Sceilg Mhichíl. The existing scaffold base structure will be maintained and works being carried out within the footprint of the existing structure.

4.2 Description of project location

The project is located on the main tourist route near Cross Cove on the Lighthouse Road, Sceilg Mhichíl. Sceilg Mhicíl is an island off southwest Ireland in the Atlantic Ocean. It lies approximately 12km off the Iveragh Peninsula in Co. Kerry. The island forms part of the Skelligs SPA and is a World Heritage being home to an Early Christian settlement with well-preserved access steps, a monastery, a remote hermitage and other monastic structures. The island's isolation has helped to preserve and protect these monastic remains (DHLGH & OPW, 2020)

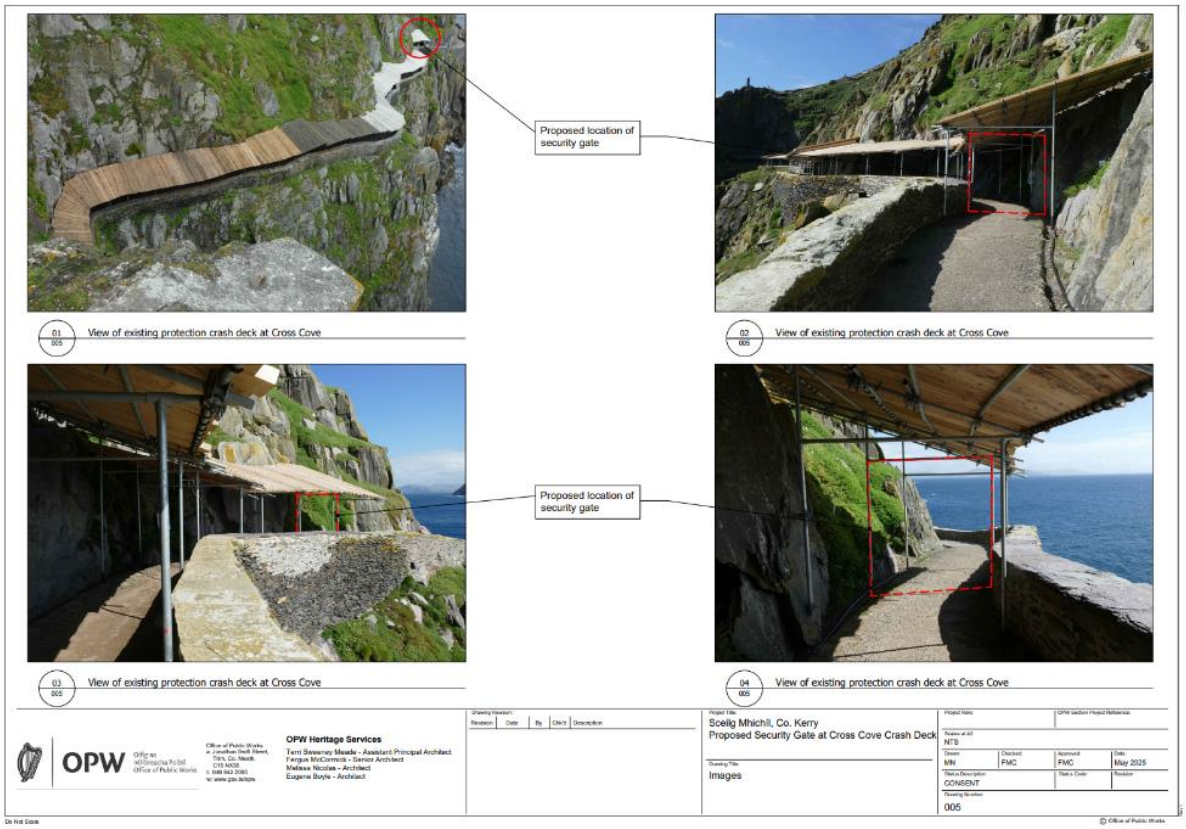

Figure 2: Project location

4.3 Baseline Characterisation

4.3.1 Overview of Baseline Data

The site of the proposed works is located on the lower lighthouse road near the end of the timber canopy extension toward the landing northeast of Cross Cove, on Sceilg Mhichíl- within the Skelligs SPA (004007). This island is a World Heritage Site and Statutory Nature Reserve which is subject to regular tourist footfall as well as maintenance works teams throughout the summer season. Data which informs this report was gathered in summers 2021-2024 from mid-May to October and May 2025.

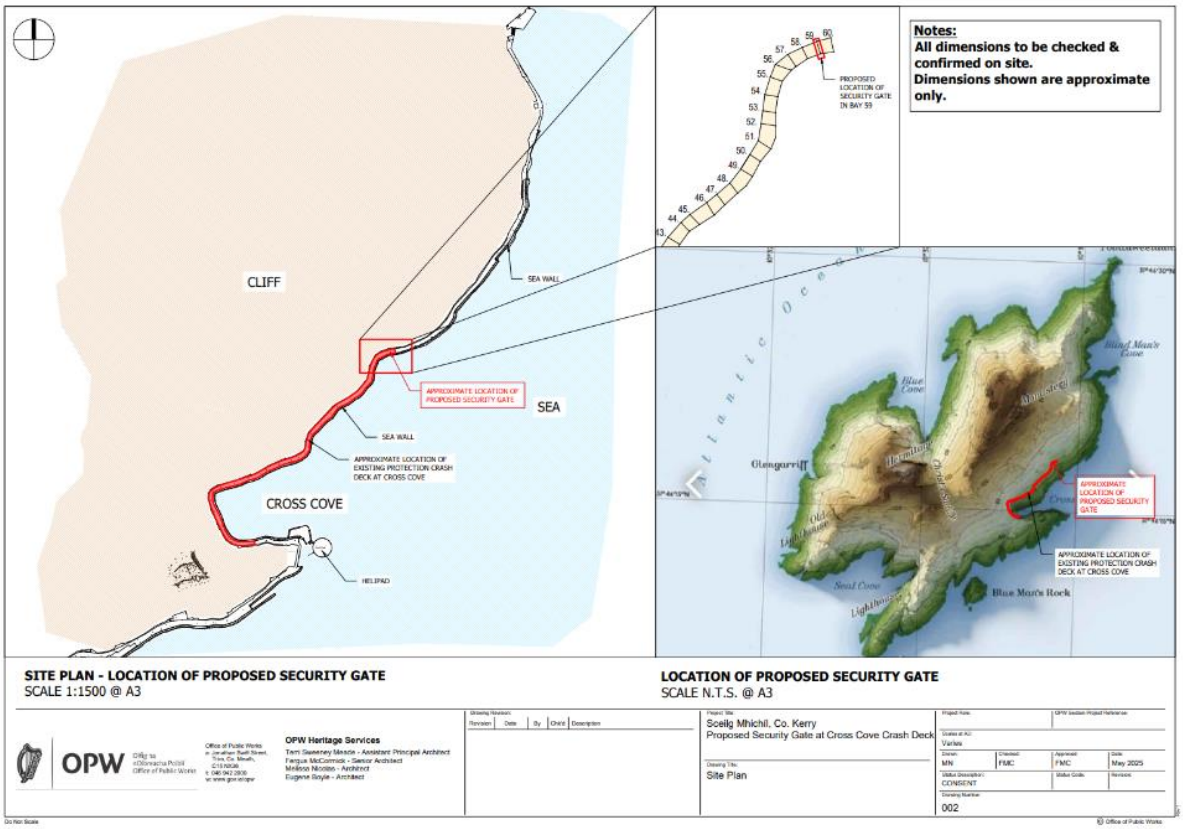

Figure 3: Location of the existing canopy where gate is to be installed

4.3.2 Habitats

Rocky Sea Cliffs CS1

Rocky cliffs of varying heights surround the island. The bases of these cliffs tend to be smoother where erosion is evident, and exposed bed shows signs of past collapses. The upper sections comprise of more ledges and crevices. Vegetation has built up in several areas and is usually dominated by Sea Campion or Thrift, in less exposed areas the vegetation varies, and grasses such as Red Fescue and Yorkshire Fog are found. These cliffs provide nesting habitat for several bird species listed on the

Skelligs SPA (004007) conservation objectives: Fulmar (*Fulmaris glacialis*), Kittiwake (*Rissa tridactyla*), Guillemot (*Uria aalge*) and Puffin (*Fratercula arctica*).

Stonewalls and Other Stonework BL1

Old stone walls and stairways of an ancient monastic settlement are found across the site and these provide nesting habitat for several bird species listed on the Skelligs SPA (004007) conservation objectives. The primary protected species associated with this type of habitat which is listed on the conservation objectives of the site is the Storm Petrel (*Hydrobates pelagicus*).

Buildings and artificial surfaces BL3

Buildings on the island consist of workers huts and associated storage buildings, a helipad, lighthouses and associated outbuildings, and a public composting toilet. These structures provide an important habitat for lichens and bryophytes on the island.

Sea Walls Piers and Jetties CC1

This habitat comprises of the landing pier which is located at Blind Man's Cove.

Open Marine Water MW1

Open marine water completely surrounds the island and is important for a variety of marine species.

Sea Inlets and Bays MW2

There are several naturally occurring inlets and bays located around the island including the landing at the North Steps, Seals Cove and Blind Man's Cove.

4.3.3 Mammals

An assessment of the likely presence of protected and notable mammal and aquatic species, listed on Annexes II, IV and V of the Habitats Directive and under the Wildlife Act 1976-2012 was undertaken. Records of terrestrial mammals were searched for through The National Biodiversity Data Centre (NBDC) and the most recent records taken from ecological survey work carried out on the island from May to October 2021-2024 and are listed in Table 3 below.

Table 3 Mammals recorded on/from the site

Species (Common name)	Species (*Scientific name*)	Date recorded	Designation
Common Pipistrelle	*Pipistrellus pipistrellus*	31-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts

Soprano Pipistrelle	*Pipistrellus pygmaeus*	04-Sept-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Nathusius' Pipistrelle	*Pipistrellus nathusii*	03-Sept-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Leisler's Bat	*Nyctalus leisleri*	04-Sept-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Brown Long-eared Bat	*Plecotus auritus*	Sept 2024	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Grey Seal	*Halichoerus grypus*	23-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex II || Protected Species: EU Habitats Directive >> Annex V || Protected Species: Wildlife Acts
Bottlenose Dolphin	*Tursiops truncatus*	23-Jun-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex II || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Common Dolphin	*Delphinus delphis*	23-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Risso's Dolphin	*Grampus griseus*	23-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Harbour Porpoise	*Phocoena phocoena*	23-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex II || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts || Threatened Species: OSPAR Convention
Fin Whale	*Balaenoptera physalus*	04-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts

Humpback Whale	*Megaptera novaeangliae*	20-Jul-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
Minke Whale	*Balenoptera acutorostrata*	10-Aug-2021	Protected Species: EU Habitats Directive || Protected Species: EU Habitats Directive >> Annex IV || Protected Species: Wildlife Acts
European Rabbit	*Oryctolagus cuniculus*	11-Oct-2021	Invasive Species: Invasive Species || Invasive Species: Invasive Species >> Medium Impact Invasive Species
House Mouse	*Mus musculus*	11-Oct-2021	Invasive Species: Invasive Species || Invasive Species: Invasive Species >> High Impact Invasive Species

4.3.4 Avifauna

Sceilg Mhicíl is the larger of two islands in The Skelligs SPA. During the course of Ecological survey work carried out from May to October during 2021-2024 by Envirico ecologist Brian Power, the following avifauna were recorded on or from the island. The special conservation interests (SCIs) of the Skelligs SPA are highlighted in blue and bold, other breeding species are highlighted in bold .

Table 4 Birds recorded on/from the site

Species (Common name)	Species (*Scientific name*)	First Date Recorded	Confirmed Breeding
Fulmar	***Fulmarus glacialis***	**18-May-21**	**Y**
Manx Shearwater	***Puffinus puffinus***	**18-May-21**	**Y**
Storm Petrel	***Hydrobates pelagicus***	**18-May-21**	**Y**
Gannet	***Morus bassana***	**18-May-21**	**Y**
Kittiwake	***Rissa tridactyla***	**18-May-21**	**Y**

Puffin	***Fratercula arctica***	**18-May-21**	**Y**
Guillemot	***Uria aalge***	**18-May-21**	**Y**
Shag	***Phalacrocorax aristotelis***	**18-May-21**	**Y**
Peregrine	***Falco peregrinus***	**18-May-21**	**Y**
Herring Gull	***Larus argentatus***	**18-May-21**	**Y**
Great Black-backed Gull	***Larus marinus***	**18-May-21**	**Y**
Lesser Black-backed Gull	***Larus fuscus***	**18-May-21**	**Y**
Razorbill	***Alca torda***	**18-May-21**	**Y**
Rock Pipit	***Anthus petrosus***	**18-May-21**	**Y**
Wheatear	***Oenanthe oenanthe***	**21-May-21**	**Y**
Chough	***Pyrrhocorax pyrrhocorax***	**18-May-21**	**Y**
Hooded Crow	***Corvus cornix***	**01-Jun-21**	**Y**
Raven	***Corvus corvax***	**18-May-21**	**Y**
Cory's Shearwater	*Calonectris borealis*	02-Jun-21	N
Oystercatcher	*Haematopus ostralegus*	22-May-21	N

Pomarine Skua	*Stercorarius pomarinus*	19-May-21	N
Feral Pigeon	*Columba livia domestica*	01-Jun-21	N
Barn Swallow	*Hirundo rustica*	28-May-21	N
House Martin	*Delichon urbicum*	01-Jun-21	N
Meadow Pipit	*Anthus pratensis*	19-May-21	N
Pied Wagtail White Wagtail	*Motacilla alba yarrellii* *Motacilla alba alba*	18-May-21 15-Aug-22	N N
Willow Warbler	*Phylloscopus trochilus*	28-May-21	N
Chiffchaff	*Phylloscopus collybita*	30-May-21	N
Sooty Shearwater	*Ardenna grisea*	20-Jun-21	N
Collared Dove	*Streptopelia decaocto*	22-Jun-21	N
Rose Coloured Starling	*Pastor roseus*	24-Jun-21	N
Cormorant	*Phalacrocorax carbo*	08-Jul-21	N
Swift	*Apus apus*	17-Jul-21	N
Starling	*Sturnus vulgaris*	18-Jul-21	N
Balearic Shearwater	*Puffinus mauretanicus*	19-Jul-21	N
Leach's Petrel	*Hydrobates leucorhous*	19-Jul-21	N
Great Shearwater	*Ardenna gravis*	05-Aug-21	N
Turnstone	*Arenaria interpres*	06-Aug-21	N

Purple Sandpiper	*Calidris maritima*	06-Aug-21	N
Great Skua	*Stercorarius skua*	10-Aug-21	N
Curlew	*Numenius arquata*	10-Aug-21	N
Long-tailed Skua	*Stercorarius longicaudus*	10-Aug-21	N
Arctic tern	*Sterna paradisaea*	18-Aug-21	N
Artic Skua	*Stercorarius parasiticus*	15-Sep-21	N
Pied Flycatcher	*Ficedula hypoleuca*	30-Aug-21	N
Sedge Warbler	*Acrocephalus schoenobaenus*	30-Aug-21	N
Robin	*Erithacus rubecula*	30-Aug-21	N
Spotted Flycatcher	*Musciapa striata*	30-Aug-21	N
Snow Bunting	*Plectrophenax nivalis*	11-Oct-21	N
Kestrel	*Falco tinnunculus*	14-Sep-21	N
Marsh Harrier	*Circus aeruginosus*	17-May-22	N
Black Kite	*Milvus migrans*	17-May-22	N
Chaffinch	*Fringilla coelebs*	18-May-23	N

Mediterranean gull	*Ichthyaetus melanocephalus*	08-Jul-22	N
Grey Heron	*Ardea cineraria*	09-Aug-22	N
Common Scoter	*Melanittia nigra*	15-Aug-22	N
Fea's type petrel	*Pterodroma feae*	21-Aug-22	N
Sabine's Gull	*Xema sabini*	31-Aug-22	N
Goldcrest	*Regulus regulus*	31-Aug-22	N
Whimbrel	*Numenius phaeopus*	31-Aug-22	N
Icterine Warbler	*Hippolais icterina*	01-Sep 22	N
Whitethroat	*Sylvia communis*	13 Sep 22	N
Blyth's Reed Warbler	*Acrocephalus dumetorum*	13-Sep-22	N
Lapland Bunting	*Calcarius lapponicus*	14 Sep 22	N
Skylark	*Alauda arvensis*	14-Sep-22	N
Jackdaw	*Coloeus monedula*	22-Oct-22	N (Skellig Cam)
Fieldfare	*Turdus pilaris*	23-Oct-22	N (Skellig Cam)
Song thrush	*Turdus philomelos*	24-Oct-22	N (Skellig Cam)
Black-browed Albatross	*Thalassarche melanophris*	16 May 23	N
Melodious Warbler	*Hippolais polyglotta*	04 Sep 23	N

Nightingale	*Luscinia megarhynchos*	05 Sep 23	N
Turtle Dove	*Streptopelia turtur*	06 Sep 23	N
Whinchat	*Saxicola rubetra*	06-Sep-23	N
Reed Warbler	*Acrocephalus scirpaceus*	06 Sep 23	N
Wryneck	*Jynx torquilla*	07-Sep-23	N
Wren	*Troglodytes troglodtytes*	13-Sep-23	N
Blackburnian Warbler	*Setophaga fusca*	20-Sep-23	N
Red-eyed Vireo	*Vireo olivaceus*	21-Sep-23	N
Redwing	*Turdus iliacus*	20-Apr-24	N
Ring Ouzel	*Turdus torquatus*	20-Apr-24	N
Lesser Redpoll	*Acanthis cabaret*	02-May-24	N
Tree pipit	*Anthus trivialis*	19-Apr-24	N
Sand martin	*Riparia riparia*	21-Apr-24	N
Kumlien's Gull	*Larus glaucoides spp kumlieni*	02-May-24	N
Blackcap	*Sylvia atricapilla*	22-Apr-24	N
Great northern Diver	*Gavia immer*	07-May-24	N
Golden plover	*Pluvialis apricaria*	18-May-24	N
Black Redstart	*Phoenicurus ochruros*	18-May-24	N

Pectoral Sandpiper	*Calidris melanotos*	18-May-24	N
Grey Wagtail	*Motacilla cinera*	18-May-24	N
Snipe	*Gallinago gallinago*	19-May-24	N
Wilson's Storm petrel	*Oceanites iceanicus*	14-Aug-24	N
Sparrowhawk	*Accipiter nisus*	13-Sep-24	N
Lesser Whitethroat	*Sylvia curruca (blythii or halimodendri)*	19-Sep-24	N
Hen Harrier	*Circus cyaneus*	20-Sep-24	N
Woodchat Shrike	*Lanius senator*	13-May-25	N

4.3.5 Invasive Species

Two species listed on the Non-native species Risk Assessment for Ireland were observed on the island. House Mouse (*Mus musculus*) is listed on the High-Risk category (with a score of 20/25) and was recorded regularly from 2021 to 2024 both through casual sightings and targeted surveys. European Rabbit (*Oryctolagus cuniculus*) is listed on the Medium Risk Category (with a score of 16/25) was has been encountered on a near daily basis on the island.

4.3.6 Aquatic Environment

There are no freshwater aquatic features within the confines of, or adjacent to the site. The marine water environment is characterised by Figures 3 and 4 below. The Southwestern Atlantic Seaboard (HAs 21;22) is the coastal water body adjacent to the site and within the Skelligs SPA (004007). Water Framework Directive status of this coastal water body is set as high. This water body is deemed Not at Risk by the EPA.

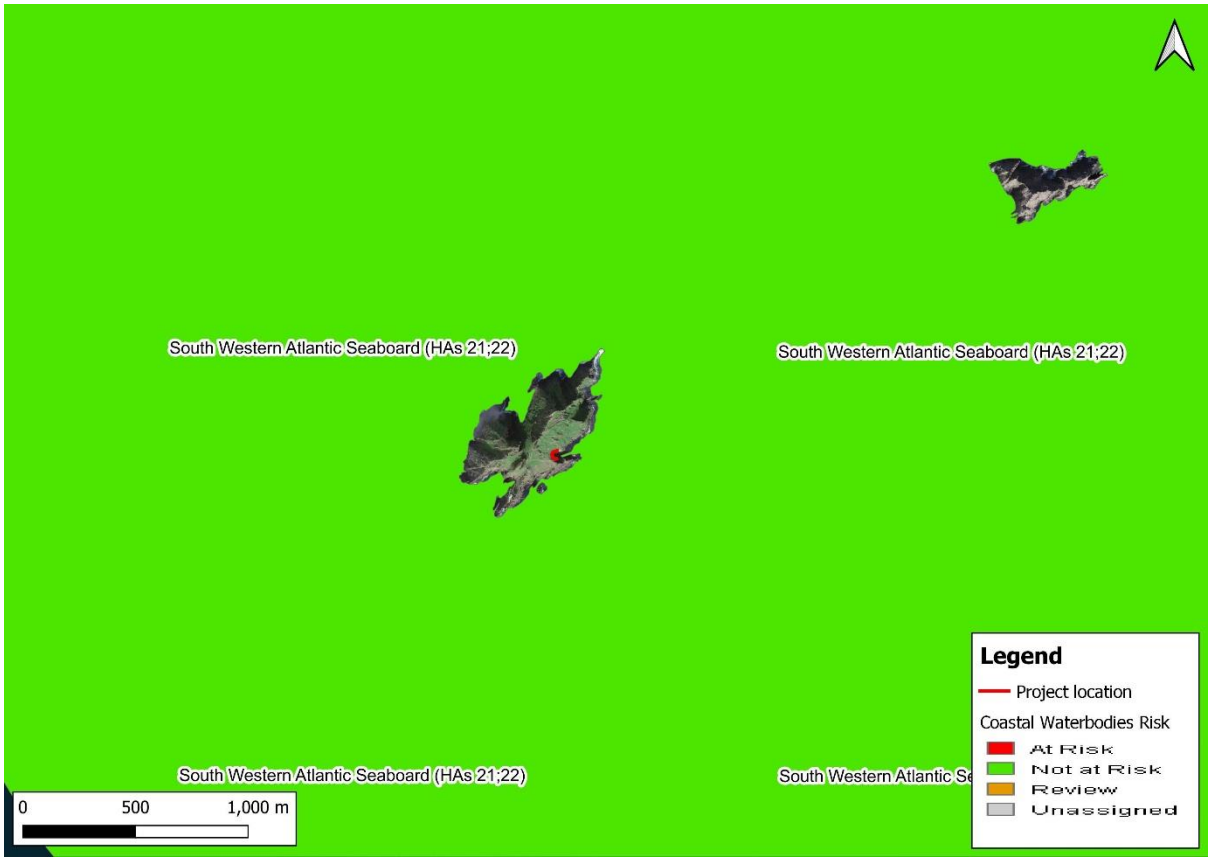

Figure 4: Coastal waterbodies risk status

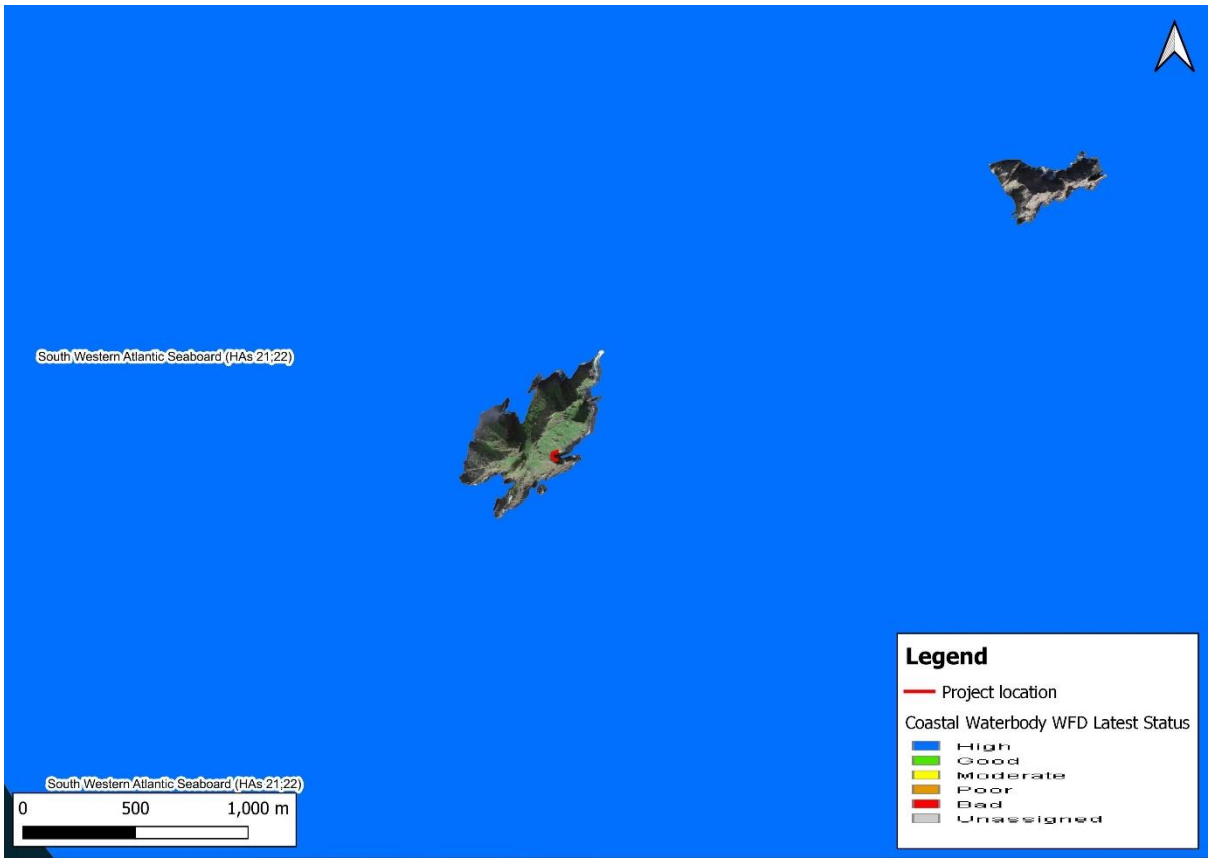

Figure 5: Coastal waterbodies Water Framework Directive status

4.4 Identification of European Sites

The site of the proposed works is within the boundary of the Skelligs SPA (004007), which is located approximately 12km from the mainland. There are three other Natura 2000 sites within a 15km radius. However, these are not considered to be within the Zone of Influence owing to the isolated nature of the site and a lack of connectivity.

4.5 Assessment of Potential Likely Significant Effects

Based on the project description as set out in Section 4.1 and the Zone of Influence of the project, using professional judgement and published guidance, potential effects can be identified. Table 5 focuses on the potential effects that could occur during the construction and operational phase of the proposed project.

Table 5 Potential Likely Significant Effects (LSEs)

Potential LSEs	Description of Effect	ZoI - likely area over which effect could occur
Construction		
Noise and vibration/unfamiliar visual stimuli (e.g. machinery/people)	Potential for noise from installation and construction works	Owing to the small scale of the project this impact would be limited to the immediate area of the works
Potential for impact from falling objects	Potential for dropped items to cause direct or indirect disturbance to bird species below	Owing to best practice measures in place for the site this should have no impact on the island
Operational		
No potential operational phase impacts have been identified		
Given the proposals, nature and scale of the proposed development there is potential for Likely Significant Effects on Skelligs SPA (004007)		

4.5.1 Potential In-combination Effects

AA Screening must identify all aspects of the project which would have Likely Significant Effects on a European site, either alone (as identified in Table 5) or in-combination with other aspects of the same project and/or with other plans or projects. Two types of in-combination effects should be considered. Intra-project effects are the combined effects of different types of impact within the proposed project, for example the combined effects of disturbance and changes to water quality. Inter-project impacts are combined impacts from different projects and those resulting from the proposal, for example, a similar operation in close proximity. Inter-project in-combination effects are considered to be those that may arise from the project in-combination with other plans and projects that are completed, as well as those proposed and consented but not yet built and operational. Plans or projects that are

proposed (but not yet approved) should also be considered in this context (EC, 2002). A search for relevant plans and projects within the ZoI was undertaken for assessment of in-combination impacts, the source listed below were searched:

- Kerry County Council
- An Bord Pleanala
- OPW work plans

Owing to the isolated nature of the site and the absence of any other projects in the area there is no potential for in-combination effects.

4.6 Screening Conclusion

Following examination of the proposed project, including the nature and location of works, it has been concluded that there is potential for Likely Significant Effects to occur for:

Skelligs SPA 004007

The proposed project has the potential to impact on the SCIs of the Skelligs SPA. In the absence of mitigation, impacts could be significant. This Screening for AA has established that the proposed project has the potential to undermine the conservation objectives for the site, either alone, or in combination with other plans or projects. Therefore, an Appropriate Assessment (AA) of the proposed project is required. Further assessment of the potential impacts on the SPA will be required through the preparation of a NIS (Natura Impact Statement).

5 Information for Appropriate Assessment

5.1 General Ecology of the Area

The proposed project site is located within the Skelligs SPA (004007). No Annex I species were recorded within the boundary of the proposed works area. Seven species of bird are listed as SCIs for the Skelligs SPA, six of which nest on Sceilg Mhicíl. A complete list of these and other bird species can be found in Table 2. Fulmar and Puffin nest on ledges and habitat in close proximity to the proposed works with Storm Petrel nests located in the exterior of the wall bordering the lighthouse road. Kittiwake and Fulmar nest on ledges below the seas wall in the wider area and Guillemot nest in a colony nearby. No Manx Shearwater nests are known from the immediate area. Gannets do not utilise the island.

Habitats and flora within the proposed development site were classified using the Heritage Council's Guide to Habitats in Ireland (Fossitt, 2000). Within each habitat, dominant and abundant plant species and indicator species were recorded. Habitats recorded within the proposed development site comprised the following;

- Rocky Sea Cliffs (CS1)
- Stone Walls and other stonework (BL1)
- Buildings and Artificial Surfaces (BL3)
- Sea walls, Piers and Jetties (CC1)
- Open Marine Water (MW1)
- Sea inlets and bays (MW2)

A search of the National Biodiversity Data Centre (NBDC) database identified no Annex IV (Habitats Directive) species. This search identified the presence of two invasive species on the Island, House mouse and European rabbit.

Four species of bat were recorded on the island between the 28th of August and 5th of September 2021 (see Table 3) and a Brown Long-eared bat recorded in September 2024. No suitable roost habitat is located within the proposed project area.

5.2. European Sites Taken to Stage 2 AA (Skelligs SPA (004007))

The proposed project site is within the Skelligs SPA (004007). The Skelligs SPA lies in the Atlantic Ocean and is comprised of Sceilg Mhichíl, Little Skellig and some of the surrounding marine area.

The geology of the island consists of primarily red conglomerate, sandstone and mudstone. The SCIs for the site are listed in Table 2 and discussed in detail in section 5.3.

5.3 Special Conservation Interests Potentially Impacted by the Proposed Development

5.3.1 Fulmar (*Fulmarus glacialis*)

Fulmars are a member of the tubenose family that nest on cliffs and ledges around Ireland and other coastal areas in the North Atlantic. The majority of Irish birds are found in the west of the country (Mitchell et al., 2004). Fulmars are on the Amber List of Birds of Conservation Concern, Ireland (BoCCI) 2020-2026 (Gilbert, et al., 2021). Work on Scottish colonies suggests that breeding begins in mid-May, with chicks subsequently fledging in late August (Edwards et al., 2013). Work on Sceilg Mhicíl during the 2021-2024 seasons suggests this pattern is similar on the island with fledging peaking in the fourth week of august (B Power 2024, personal communication).

5.3.2 Puffin (*Fratercula arctica*)

Puffins are one of three species of Auk breeding on Sceilg Mhichíl, and are found well distributed throughout the North Atlantic (Mitchell, et al., 2004). They are typically a burrow nesting species of seabird (Finney, et al., 2001). The breeding period typically begins in late April/May when a single egg is laid with at least some eggs hatched by mid-May (Taylor, et al., 2012). Estimates of the fledging period vary from 36 to 83 days (DEHLG, 2015; Taylor, et al., 2012; Finney, et al., 2001). Work on Sceilg Mhicíl during 2021-2024 suggests this pattern is similar on the island, with some birds noted to be on egg during the 2024 season by 19th April, hatching being detected on 16th May and the majority of monitored nests fledged in the last week of July (B Power 2024, personal communication). They are on the Red List of Birds of Conservation Concern, Ireland (BoCCI) 2020-2026 (Gilbert, et al., 2021).

5.3.3 Storm Petrel (*Hydrobates pelagicus*)

Storm petrel are a small pelagic species of seabird found throughout the North Atlantic (Mitchell, et al., 2004). In Ireland the breeding population is mainly associated with islands off the west coast. The breeding period typically commences in May/June (DEHLG, 2015), with the majority of eggs laid in late June (Ratcliffe, et al., 1998). Hatching typically occurs between mid-July and mid-Aug with average departure dates on Stockholm Island in Wales, ranging from 6th September – 20th October (Davies, 1957). However, the species has a highly variable phenology and birds may be present holding territory early in the season. They are on the Amber List of Birds of Conservation Concern, Ireland (BoCCI) 2020-2026 (Gilbert, et al., 2021). During the 2024 season on Sceilg Mhicíl fledging commenced between the 09th and 11th of September, a total of 5 nests were presumed to have fledged by the last monitoring round on the 24th September 2024 with 17 nests remaining active. The remaining active nests showed varying stages of development.

During the 2021 season some nests were known to be active in mid-October, at which point some were still in a mid-moult stage (B Power 2024, personal communication)

5.3.4 Kittiwake (*Rissa tridactyla*)

Kittiwakes are a species of gull found throughout the Northern Hemisphere. They are often a colonial nesting species (Mitchell, et al., 2004). The breeding season typically begins within the first two weeks of May (Mitchell, et al., 2004; Taylor, et al., 2012), although sometimes as early as January or February (DEHLG, 2015). Fledging occurs between five and seven weeks (Vincenzi & Mangel, 2013). Work on the island during the 2021-2024 season showed Kittiwakes following this pattern with numbers of apparently occupied nests variable throughout each year on the island, (B Power 2024, personal communication). Sceilg Mhicíl holds nationally important numbers of kittiwake. Data collected under the National Seabird Monitoring Programme over the period 2013 – 2018 estimated the breeding population of kittiwake on Sceilg Mhicíl to comprise 789 apparently occupied nests (Cummins et al., 2019), this number has fluctuated and shown noticeable declines over the course of monitoring from 2019 to 2024 B Power 2024, personal communication). Kittiwakes are on the Red List of Birds of Conservation Concern, Ireland (BoCCI) 2020-2026 (Gilbert, et al., 2021).

5.3.5 Guillemot (*Uria aalge*)

Guillemots are a species of auk that nest on outer sea cliffs of the island. In Ireland their distribution is scattered around the coast with Dublin, Wexford and Clare holding large colonies (Mitchell, et al., 2004). Guillemots are on the Amber List of Birds of Conservation Concern, Ireland (BoCCI) 2020-2026. The breeding season usually commences in late March/April with young typically leave the nest sometime between mid-June and mid-July where they continue to develop at sea (Birkhead, et al., 2012; Taylor, et al., 2012).

5.4 Assessment of Potential Likely Significant Effect on Skelligs SPA (004007)

Table 6 Assessment of Significance Skelligs SPA (004007)

Special Conservation Interest (SCI)	Potential for Likely Significant Effect	Rationale
Fulmar [A009]	Yes	• Fulmar nesting habitat is not found within the proposed works area, they are however found on cliffs and ledges in close proximity to the works areas • Works may overlap with the Fulmar breeding season • There is potential for direct collision with birds loafing or commuting through the area below the sea wall should items fall from the work zone. • There is potential for sound disturbance during the installation of the proposed gate
Manx Shearwater [A013]	No	• Manx Shearwaters do not utilise any nesting habitat within or in close proximity to the proposed works
Storm Petrel [A014]	Yes	• Storm Petrels do not utilise any nesting habitat within the proposed works area. They are however known to utilise the lighthouse road wall and may utilise open ground above the proposed site and as such may be subjected to sound disturbance from the proposed works. • Works may overlap with the Storm Petrel breeding season
Gannet [A016]	No	• Gannets do not utilise Sceilg Mhicíl as a breeding or roosting site. Therefore, no significant effects are envisaged as a result of the proposed works
Kittiwake [A188]	Yes	• Kittiwakes do not utilise any nesting habitat within the proposed works area however birds occasionally loaf on ledges and outcrops below the works area. • Works may overlap with the Kittiwake breeding season

		• There is potential for direct collision with birds loafing or commuting through the area below the sea wall should items fall from the work zone.
Guillemot [A199]	Yes	• Guillemots do not utilise any nesting habitat within the proposed works area, is not envisaged that sound will impact Guillemots owing to topography of the island and distance from the proposed site • There is potential for direct collision with birds loafing or commuting through the area below the sea wall should items fall from the work zone.
Puffin [A204]	Yes	• Puffins do not utilise any nesting habitat within the proposed works. They are however known to utilise the old lighthouse wall and utilise open ground above and below the proposed site. • Works may overlap with the Puffin breeding season • During the construction phase there is potential for sound disturbance to Puffins

6 Appraisal for Potential Significant Effects on Skelligs SPA (004007)

Here follows an evaluation of the potential ecological impacts identified above which may arise as a result of the proposed works on the qualifying features that have been selected for impact assessment in **Section 5** above and determines whether the proposal is likely to have adverse effectson the Conservation Objectives of the Skelligs SPA. Note that there is no operational phase to the proposed works.

6.1 Likely adverse effects

The likelihood of adverse effects to the Skelligs SPA from the proposed works has been determined based on a number of indicators that show potential for:

- Disturbance and/or displacement of species at the breeding site
- Direct collisions should items fall from the work zone

The likelihood of significant cumulative/in-combination effects is assessed in **Section 6.3** below.

6.1.1 Disturbance and/or displacement of species

The breeding season will have commenced during the period of the proposed works for the SCIs on the island, although nesting habitat is not found within the works area, several SCIs may be present within close proximity.

Battery operated power tools will be used to for the installation process There will be increased human activity in the area, although on the main tourist route and segregated from habitat by the existing canopy structure.

6.1.2 Direct Collisions

The works location is partitioned from cliffs below by the sea wall and the slopes above by a timber canopy. There is a potential risk of direct collisions with birds moving through or loafing on the slopes below works area. Puffins and Fulmars utilise areas on ledges below the sea wall while Kittiwake and Guillemot commute through the area to nearby habitat. This risk is in the form of direct impacts with birds should items fall from the works area.

6.2 Assessment of Effects on the Conservation Objectives of the Skelligs SPA

In Section 5 above, an evaluation was undertaken to determine which of the SCIs for the Skelligs SPA potentially lie within the zone of influence of the project and required further assessment in the NIS. This was done through a scientific examination of ecological evidence and data listed

above in Section 3 or referenced. In this case, all SCIs apart from Gannet and Manx Shearwater were selected for further assessment (see Section 5 for more information).

The conservation objectives for the Skelligs SPA have been updated from generic and now have their own set of targets and attributes.

Table 7 Appraisal for potential impacts on Fulmar [A009]

Attribute	Target	Assessment of Likely Significant Effect	Mitigation
Breeding population size: apparently occupied sites (AOSs)	Long term SPA population trend is stable or increasing	Yes, there is potential for risk of collision for adult birds that may be loafing or holding territory in the area from falling material dropped from the site of the proposed works	Yes See section 7.
Productivity rate	Sufficient to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Distribution: extent of available nesting options within the SPA	Sufficient availability of suitable nesting sites throughout the SPA to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Forage spatial distribution, extent, abundance and availability	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target	No likely significant effect envisaged.	N/A
Barriers to connectivity	Barriers do not significantly impact the population's access to the SPA or other ecologically important sites outside the SPA	No likely significant effect envisaged.	N/A
Disturbance at the breeding site	Disturbance occurs at levels that do not significantly impact on birds at the breeding site	Potential for noise pollution causing disturbance to nesting birds in close proximity to the site of the proposed works.	Yes See section 7.
Disturbance at areas ecologically connected to the colony	Disturbance occurs at levels that do not significantly impact on breeding population	No likely significant effect envisaged.	N/A

Table 8 Appraisal for potential impacts on Storm Petrel [A014]

Attribute	Target	Assessment of Likely Significant Effect	Mitigation
Breeding population size	Long term SPA population trend is stable or increasing	No likely significant effect envisaged.	N/A
Productivity rate	Sufficient to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Distribution: extent of available nesting options within the SPA	Sufficient availability of suitable nesting sites throughout the SPA to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Forage spatial distribution, extent, abundance and availability	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target	No likely significant effect envisaged.	N/A
Barriers to connectivity	Barriers do not significantly impact the population's access to the SPA or other ecologically important sites outside the SPA	No likely significant effect envisaged.	N/A
Disturbance at the breeding site	Disturbance occurs at levels that do not significantly impact on birds at the breeding site	Potential for noise pollution causing disturbance to nesting birds in close proximity to the site of the proposed works.	Yes See section 7.
Disturbance at areas ecologically connected to the colony	Disturbance occurs at levels that do not significantly impact on breeding population	No likely significant effect envisaged.	N/A

Table 9 Appraisal for potential impacts on Guillemot [A199]

Attribute	Target	Assessment of Likely Significant Effect	Mitigation
Breeding population size: apparently occupied sites (AOSs)	Long term SPA population trend is stable or increasing	Yes, there is potential for risk of collision for adult birds that may be loafing or holding territory in the area from falling material dropped from the site of the proposed works	Yes See section 7.

Productivity rate	Sufficient to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Distribution: extent of available nesting options within the SPA	Sufficient availability of suitable nesting sites throughout the SPA to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Forage spatial distribution, extent, abundance and availability	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target	No likely significant effect envisaged.	N/A
Barriers to connectivity	Barriers do not significantly impact the population's access to the SPA or other ecologically important sites outside the SPA	No likely significant effect envisaged.	N/A
Disturbance at the breeding site	Disturbance occurs at levels that do not significantly impact on birds at the breeding site	Potential for noise pollution causing disturbance to nesting birds in close proximity to the site of the proposed works.	Yes See section 7.
Disturbance at areas ecologically connected to the colony	Disturbance occurs at levels that do not significantly impact on breeding population	No likely significant effect envisaged.	N/A

Table 10 Assessment of effects on conservation objectives of kittiwake

Attribute/Measure	Target	Assessment of Potentially Significant Effects	MitigationRequired
Breeding population size	Long term SPA population trend is stable or increasing	Yes, there is potential for risk of collision for adult birds that may be nesting, loafing or holding territory in the area from falling material dropped from	Yes See section 7

		the site of the proposed works	
Productivity rate	Sufficient to maintain a stable or increasing population	No significant decline in productivity rate of kittiwake within the SPA is predicted as a result of the proposal.	No
Distribution: extent of available nesting options within the SPA	Sufficient availability of suitable nesting sites throughout the SPA to maintain a stable or increasing population	No significant decline in the distribution of kittiwake breeding colonies within the SPA is predicted as a result of the proposal.	No
Forage spatial distribution, extent, abundance and availability	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target	No significant decline in the prey biomass available to kittiwake within the SPA is predicted as a result of the proposal.	No
Barriers to connectivity	Barriers do not significantly impact the population's access to the SPA or other ecologically important sites outside the SPA	There will be no increase in barriers to connectivity for kittiwake within the SPA as a result of the proposal.	No
Disturbance at the breeding site	Disturbance occurs at levels that do not significantly impact on birds at the breeding site	The proposed works may overlap with the start of the Kittiwake breeding season. Although Kittiwakes do not nest in the core works area they nest on rock ledges and cliffs below. Some general	Yes See Section 7

		protective measures are recommended to minimise any potential disturbance impacts as a result of the proposed works	
Disturbance at areas ecologically connected to the colony	Disturbance occurs at levels that do not significantly impact on breeding population	No, the project will not impact areas ecologically connected to the island	No

Table 11 Assessment of effects on conservation objectives of puffin

Attribute	Target	Assessment of Likely Significant Effect	Mitigation
Breeding population size	Long term SPA population trend is stable or increasing	Yes, there is potential for risk of collision for adult birds that may be loafing or holding territory in the area from falling material dropped from the site of the proposed works	Yes See section 7.
Productivity rate	Sufficient to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Distribution: extent of available nesting options within the SPA	Sufficient availability of suitable nesting sites throughout the SPA to maintain a stable or increasing population	No likely significant effect envisaged.	N/A
Forage spatial distribution, extent, abundance and availability	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target	No likely significant effect envisaged.	N/A
Disturbance at the breeding site	Disturbance occurs at levels that do not significantly impact on	Potential for noise pollution causing disturbance to nesting birds in close proximity	Yes See section 7.

	birds at the breeding site	to the site of the proposed works.	
Disturbance at areas ecologically connected to the colony	Disturbance occurs at levels that do not significantly impact on breeding population	No likely significant effect envisaged.	N/A
Barriers to connectivity	Barriers do not significantly impact the population's access to the SPA or other ecologically important sites outside the SPA	No likely significant effect envisaged.	N/A

7. Mitigation of Risks

7.1 Ecological Clerk of Works

A qualified Ecological Clerk of Works will be appointed to oversee the proposed works.

- The OPW and DHLGH will meet with the ECoW at the commencement of the works to discuss and agree all details of the proposed works.
- The ECoW will conduct a pre-works survey of the general area surrounding the proposed works site to establish the presence of SCIs in the area and will submit a report to OPW on completion of the works which will be forwarded to the DHLGH and NPWS for comment.

7.2 Construction Phase

During the construction phase of the proposed works the following measures are proposed in order to avoid or reduce any potential disturbance of breeding birds in the footprint of the site of works.

- Manual methods and light hand tools should be employed as much as possible for all works to minimise noise.
- If use of heavy-duty mechanical equipment is required, this should be completed in a staggered manner to ensure birds are able to return to the nest frequently throughout the day or if possible be carried out in a area where disturbance will be minimised.
- Erection of any scaffolding or anchors outside of the area of the proposed works will be discussed and overseen by the ECoW to avoid potential disturbance to SCIs and habitat.
- No works to be carried out or material to be stored on the sea wall to reduce risk of falling objects.
- All construction phase waste materials are to be stored in sealed bags and to be removed from the island in a controlled manner and disposed of at an appropriately licensed facility.
- No construction materials or equipment are to be left open or propped against wall habitats or drains adjacent to the site in order to avoid blocking potential nesting habitat. These should be stored in a designated secure area.

7.3 Operational Phase

The operational phase to this project is limited to a gate being in position on the lower section of the island. No operational impacts are envisaged.

8. In Combination Effect

The Kerry County Development plan identifies Sceilg Mhichíl as a UNESCO World Heritage site and highlights the need for protection of such sites.

The OPW has ministerial consent for the installation of a composting toilet for OPW work in the compound of the Lower Lighthouse. OPW intend installing the compositing toilet during the 2025 Season.

It is not envisaged that the proposed works will have any in combination effects with the installation of the composting toilet works.

8.1 Tourism

The average yearly visitor numbers to the island in the period 2009-2018 was 13,228 (Sceilg Mhichíl World Heritage Site Management Plan 2020–30). The typical tourist season runs from May until the end of September. Proximity to the landing area and lighthouse road make this an area of high tourist traffic it is therefore not envisaged that there will be an impact from a combination of tourism and the proposed works as any SCI's in proximity will be accustomed to human traffic.

9. Conclusion

A study to inform an Appropriate Assessment has been undertaken to assess the nature of potential environmental effects that may result from works associated with the installation of a security gate under the canopy northeast of Cross Cove on the Lighthouse Rd. Sceilg Mhichíl Co. Kerry. These works aim to reduce the potential for unauthorised human footfall on the island. Following the identification of Likely Significant Effects at AA Screening, consideration was given as to whether those impacts could result in adverse effects on the integrity of the Skelligs SPA (004007). AA Screening showed potential pathways for Likely Significant Effects with respect to the SCIs of the SPA. Pathways that could not be discounted at AA Screening related to noise pollution effects, prolonged exposure to people, and potential for collisions to impact the SCIs.

This report examined the potential for changes in the baseline conditions as a result of the proposed development in more detail against the conservation objectives for Skelligs SPA, using the best available baseline information, and in view of the mitigation measures proposed to mitigate the potential for adverse effects.

In conclusion, based on the best available scientific information and professional judgement, it is considered that there will be no adverse effects on the integrity of Skelligs SPA due to the size and scale of the proposed works. On the application of the mitigation, only very weak source-receptor pathways exist that could undermine the structure or ecological functioning of the site or the conservation objectives that define the favourable status of the SCI features. No supporting habitats, such as those used for breeding or commuting, or food sources would be functionally reduced.

On the basis of these weak pathways and on review of other plans and projects that could contribute to effects, significant adverse in-combination effects with other plans and projects are also not considered likely to occur. Therefore, no reasonable scientific doubt remains as to the absence of effects on the integrity of Skelligs SPA.

Table 12 Integrity of the Site in Relation to Residual Impacts

Conservation objectives: does the plan or project have the potential to:	Y/N
Cause delays in progress towards achieving the conservations objectives of the site?	N
Interrupt progress towards achieving the conservation objectives for the site?	N
Disrupt those factors that help to maintain the favourable conditions of the site?	N
Interfere with the balance, distribution and density of key species that are the indicators of the Favourable condition of the site?	N
Other objectives: does the plan or project have the potential to:	
Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem?	N
Change the dynamics of the relationships (between, for example, soil and water or plants and animals) that define the structure and/or function of the site?	N
Interfere with the predicted or expected natural changes to the site (such as water dynamics or chemical composition)?	N
Reduce the area of key habitats?	N
Reduce the population of key species?	N
Change the balance between key species?	N
Reduce the diversity of the site?	N
Result in disturbances that could affect population size or density or the balance between key Species?	N
Result in fragmentation?	N
Result in loss or reduction of key features (e.g. open wall habitat, burrow nesting habitat, etc.)?	N

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