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Appropriate Assessment Screening Report

PRESENTED TO

Dwyer Nolan Developments Ltd.

Santry Avenue LRD, junction of Santry Avenue and Swords Road, Santry, Dublin 9.

March 2024

Environmental Consultancy Services

DOCUMENT CONTROL SHEET

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TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

1 INTRODUCTION

1.1 Background

Enviroguide was commissioned by Dwyer Nolan Developments Ltd. to prepare an Appropriate Assessment (AA) Screening Report for a Proposed Large-scale Residential Development (LRD) (the 'Proposed Development') on lands at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. (hereafter referred to as the 'Site'). This Report contains information to enable the Competent Authority to undertake Stage 1 AA screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

Enviroguide is a multi-disciplinary consultancy specialising in the areas of the Environment, Waste Management and Planning. All Enviroguide consultants carry scientific or engineering qualifications and have a wealth of experience working within the Environmental Consultancy sectors, having undergone extensive training and continued professional development.

Enviroguide as a company remains fully briefed in European and Irish environmental policy and legislation. Enviroguide staff members are highly qualified in their field. Professional memberships include the Chartered Institution of Wastes Management (CIWM), the Irish Environmental Law Association and Chartered Institute of Ecology and Environmental Management (CIEEM).

All reporting has been carried out by qualified and experienced ecologists and environmental consultants. EK, Graduate Ecologist with Enviroguide, undertook the desktop research component and authored this Report. LG, Senior Ecologist with Enviroguide reviewed this Report.

EK has a BSc in Psychology from the University of Maryland, USA and an MSc in Biodiversity and Conservation from Trinity College Dublin. His experience includes desktop research, literature-scoping review, and report writing as well as vegetation surveys, rare species surveys, and habitat mapping.

LG has a B.Sc. in Zoology (Hons) and a M.Sc. (Hons) in Wildlife Conservation and Management from University College Dublin. LG has a wealth of experience in desktop research, literature scoping-review, and report writing, as well as practical field experience (e.g., Bat surveys, habitat surveys, invasive species surveys, wintering bird surveys, large mammals, fresh water macro-invertebrates etc.). LG is experienced in compiling Biodiversity Chapters of EIARs, Ecological Impact Assessments (EcIA), Appropriate Assessment (AA) screening and Natura Impact Statements (NIS) reports, and in the overall assessment of potential impacts to ecological receptors from a range of developments. LG is also a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

1.3 Description of Proposed Development

1.3.1 Site Location

The Proposed Development is located at the site of a current home improvement wholesaler (Chadwick's Builders Merchants) warehouse. The Site and surrounding lands are predominantly urban/suburban, and the Site sits at the intersection of two large roads: Santry Avenue and Swords Road, a main throughline north from Dublin City. The M50 Motorway passes approximately 400m east of the Site. The Site is served by several Dublin Bus lines. Across Santry Avenue from the Site is Santry Demesne, approximately 20m to the north.

FIGURE 1. SITE LOCATION

1.3.2 Proposed Development Description

Dwyer Nolan Developments Ltd. wishes to apply for permission for a Large-Scale Residential Development (LRD) on this site, c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref.s. 2713/17 (as extended under Ref. 2713/17/X1), 2737/19 & 4549/22).

The proposed development provides for 321 no. apartments, comprised of 104 no. 1 bed, 198 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to thirteen storey buildings, over basement level, with 3 no. retail units, a medical suite / GP Practice unit and community/arts & culture space (total c.1,460sq.m), all located at ground floor level, as well as a one storey residential amenity unit, facing onto Santry Avenue, located between Blocks A & D.

The proposed development consists of the following:

1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m2).
2) Construction of 321 no. 1, 2, & 3 bed apartments, retail units, medical suite / GP Practice, community/arts & culture space, and a one storey residential amenity unit in 4 no. buildings that are subdivided into Blocks A-G as follows:
3) Block A is a 7-13 storey block consisting of 51 no. apartments comprised of 22 no. 1 bed, 23 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. retail units located on the ground floor (c. 132sq.m & c.172sq.m respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. retail unit (c.164sq.m) and 1 no. medical suite / GP Practice unit located on the ground floor (c. 130sq.m). Refuse storage areas are also provided for at ground floor level.
4) Block C is a 7 storey block consisting of 53 no. apartments comprised of 14 no. 1 bed & 39 no. 2 bed dwellings. Adjoining same is Block D which is an 8 storey block consisting of 44 no. apartments comprised of 22 no. 1 bed, 15 no. 2 bed, & 7 no. 3 bed dwellings. Ground floor, community/arts & culture space (c. 583sq.m) is proposed in Blocks C & D, with refuse storage area also provided for at ground floor level.
5) Block E is an 8 storey block consisting of 49 no. apartments comprised of 7 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 52 no. apartments comprised of 13 no. 1 bed & 39 no. 2 bed dwellings. Ground floor, community/arts & culture space (c.877sq.m) is proposed in Blocks E & F. A refuse storage area, bicycle storage area, substation, & switchroom are also provided for at ground floor level of Blocks E & F.
6) Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
7) Construction of a 1 storey residential amenity unit (c. 166.1sq.m) locatedbetween Blocks A & D.

8) Construction of basement level car park (c.5,470.8sq.m), accommodating 161 no. car parking spaces, 10 no. motorbike parking spaces & 672 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 33 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
9) Public open space of c. 1,791sq.m is provided for between Blocks C-D & E-F. Communal open space is also proposed, located between (i) Blocks E-F & G, (ii) Blocks A-B & C-D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit, totalling c.2,986sq.m. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.
10) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
11) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

1.3.3 Description of the Construction Phase (estimated duration: 5 years)

It is estimated that construction of the development will take approximately five years to complete. The intended sequence of development may change post grant of planning permission as a detailed construction programme is dependent on contractor appointment, market and other considerations.

- **Phase 1** will consist of the delivery of the basement, Blocks A & B (89 no. units) and communal open space beside them (west of same between Blocks C & D);
- **Phase 2** will consist of the delivery of Blocks C & D (97 no. units) and public open space;
- **Phase 3** will consist of the delivery of Blocks E, F & G (135 no. units) and the remainder of works/open space etc.

The Project Engineers (DBFL) have estimated that c. 20,000 m3 of material will require excavation. It is envisaged that all of this material will be removed off-site and none is expected to be kept for on-site reuse. These estimates will be refined prior to commencement of construction.

1.3.3.1 Construction Phase Dewatering

Shallow groundwater may be encountered during the construction works of the basement excavation. Disposal of this water to sewer will require a consent/licence issued under Section 16 of the Local Government (Water Pollution) Acts and Regulations and must be obtained from Irish Water. Any such discharge licence is likely to be subject to conditions regarding the flow (rates of discharge, quantity etc.); effluent quality prior to discharge and pre-treatment (e.g., settlement/filtration, hydrocarbon separation etc.) and monitoring requirements. All dewatering will be

undertaken in strict compliance with the conditions of the discharge licence for the project.

1.3.4 Description of the Operational Phase (indefinite duration)

The Operational Phase of the Proposed Development will comprise the occupancy of the completed residential development.

1.3.5 Drainage

Site drainage information is excerpted from the Engineering Services Report (ESR) that accompanies this submission (DBFL, 2024.)

1.3.5.1 Foul Water

Existing Network adjacent to the Site

There is an existing 300mm diameter public foul sewer located on the Swords Road (R104) to the east of the Site. As part of Uisce Éireann Connection Reference, No: CDS19003221 a 225mm diameter foul sewer has been constructed within the previously approved mixed-use development (Planning Ref: 2713/17& 2737/19) to the south of the Site. This foul sewer has been constructed from the development Site boundary across Swords Road and connected to the existing 300mm diameter public foul sewer noted above under a Connection Agreement with Uisce Éireann. Note, no diversion works of existing Uisce Éireann infrastructure are required to facilitate this Proposed Development. Any existing private foul infrastructure present on Site will be grubbed up and removed.

Proposed Foul Water Drainage Strategy

The foul sewerage from the Proposed Development is proposed to discharge via gravity by means of a new 225mm diameter sewer which will discharge to a manhole constructed as part of the previously approved mixed-use development (Planning Ref: 2713/17 & 2737/19) to the south of the Site. This will negate the requirement for any construction outside of the Site boundary and minimise any disruption to the public. The new sewer will be designed and constructed in accordance with Uisce Éireann Code of Practice and Standard Detail requirements.

A Pre-Connection Enquiry was submitted to Uisce Éireann (CDS23007437). The Applicant will enter into conversation with Uisce Éireann to progress required works following receipt of Planning Approval.

The Developer will enter into a Connection Agreement with Uisce Éireann, post planning, to facilitate the proposed foul connection and any upgrade works that may be required.

Foul sewage in apartment blocks located over the basement will be drained on separate systems via 150mm diameter pipes slung from the underside of basement roof slabs and adjacent to the basement walls. Service pipes from individual properties

will project through ground floor slabs and connect into the slung drainage system which in turn will connect by gravity to the proposed external foul drainage system.

Any surface water from the basement car park generated by incidental run-off/spillage will drain through an underground system of collector pipes, gullies and ACO drains which in turn will pass through a petrol interceptor prior to discharging into a foul pumping well located under the basement. The run-off will then be pumped via a rising main which will connect to the gravity foul drainage system for the Site at ground level via an outfall manhole in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) and Uisce Éireann. For further details, please refer to the ESR (DBFL, 2024).

Foul water from the Site will eventually be treated at Ringsend Wastewater Treatment Plant (WwTP) prior to discharge into Dublin Bay.

1.3.5.2 Surface Water

Existing Surface Water Network

As per the ESR (DBFL. 2024b), there is an existing 225mm diameter public surface water sewer located on the Swords Road (R104) to the east of the Site. A surface water network was constructed within the previously approved proposed mixed-use development (Planning Ref: 2713/17 & 2737/19) to the south of the Proposed Development. This system contains an attenuation system, hydrobrake and petrol interceptor on the outfall surface water sewer. This outfall sewer discharges to the existing 225mm diameter sewer noted above. A connection to the public sewer has been made at the junction of the Swords Road with Schoolhouse Lane under permission of Dublin City Council. This connection has been approved under Planning Ref: 2713/17 & 2737/19. Any existing private infrastructure present onsite will be grubbed up and removed.

Proposed Surface Water Drainage

As detailed in the ESR (DBFL. 2024), the surface water drainage from the Proposed Development is proposed to discharge, following attenuation and hydrobrake flow control device, via a new 225mm diameter surface water sewer to a manhole constructed as part of the previously approved mixed-use development (Planning Ref: 2713/17 &2737/19) to the south of the Site.

The location of the proposed connection/outfall point will be on the existing 225mm surface water sewer constructed for the mixed-use development (Planning Ref: 2713/17 & 2737/19), following the installed hydrobrake and before the petrol interceptor. The petrol interceptor, placed under the aforementioned planning reference, has been designed to accommodate the combined permitted discharge rate from both of the Proposed Development and the permitted development located to the south(Planning Ref: 2713/17 & 2737/19).

The proposed petrol interceptor ‘Kinspan’ NSBE010 bypass petrol interceptor class 1 is designed to accommodate a flow rate of 10 l/s. The combined permissible discharge rate from both the Proposed Development and neighbouring development (Planning Ref: 2713/17 & 2737/19) is 8.9l/s. This proposed connection location will negate the

requirement for any construction outside of the Site boundary and minimise any disruption to the public.

Surface water management for the Proposed development is designed to comply with the 'Greater Dublin Strategic Drainage Study (GDSDS) Regional Drainage Policies Technical Document–Volume2, New Developments, 2005' and the 'Greater Dublin Regional Code of Practice for Drainage Works, V6.0 2005'. CIRIA Design Manuals C753, C697 and C609 have also been used to design the surface water drainage system within the site.

The GDSDS guidelines require the following main 4 main criteria to be provided by the development's surface water design;

- Criterion 1: River Water Quality Protection–satisfied by providing interception storage and treatment of run-off within the SuDS features e.g. green roofs, blue roofs and permeable paving and on-line cellular storage attenuation systems.
- Criterion 2: River Regime Protection–satisfied by attenuating run-off with flow control device prior to discharge to the outfall.
- Criterion 3: Level of Service (flooding) for the site–satisfied by the Site being outside the 1000 year coastal and fluvial flood levels. Pluvial flood risk addressed by development designed to accommodate a 100-year storm as per GDSDS. Planned flood routing for storms greater than 100-year level considered in design and development run-off contained within Site.
- Criterion 4: River flood protection–attenuation provided within the SuDS features e.g., permeable paving construction and on-line cellular storage attenuation systems.

1.3.5.2.1 SuDS measures incorporated into the surface water design

The following description of SUDS features at the Site of the Proposed Development is taken from the ESR that accompanies this submission (DBFL, 2024).

It is proposed to use a sustainable urban drainage system (SuDS) approach to stormwater management throughout the Site, the overall strategy aims to provide an effective system to mitigate the adverse effects of urban stormwater runoff on the environment by reducing runoff rates, volumes and frequency, reducing pollutant concentrations in stormwater, contributing to amenity, aesthetics and biodiversity enhancement and allow for the maximum collection of rainwater for re-use where possible. In addition, SuDS features aim to replicate the natural characteristics of rainfall runoff for any site by providing control of run-off at source and this has been achieved by the current proposals.

SuDS are a requirement of Dublin City Council under their 'Regional Code of Practice for Drainage Works' and 'The Greater Dublin Strategic Drainage Study'. Additionally, these systems are recommended under the 2009 guidelines, 'The Planning System and Flood Risk Management'. There are a number of SuDS features proposed which have been designed in accordance with CIRIA documents C753, C697 and C609 as follows:

- **Permeable Pavement**: Porous surfacing (paving block or open graded material) which can treat rainwater, at source, and allow infiltration through to an underlying porous sub-base where water can be stored within the voids of the sub-base before being slowly released to the drainage collection system through natural flow via the porous medium. As well as reducing the amount of run-off from the surface, permeable paving will slow down the rate of runoff from the pavement in extreme rainfall events contributing to attenuation of flows. In addition, permeable paving will increase the quality of water which is intercepted by the system through filtration, biodegradation, pollutant adsorption and settlement and retention of solids, also the reduction in peak flows to the outfall will enhance settlement and biodegradation of pollutants.
- **Green Roof System**: A planted roof area with low growing, low maintenance plants consisting of self-sustaining mosses, sedums, succulents, herbs or grasses over a drainage layer and waterproofing membrane. Extensive green roofs provide ecological, aesthetic and amenity benefits and intercept, treat and retain rainfall, reducing the volume of runoff and attenuation of peak flows. Extensive roofs are usually only accessed for maintenance. The soil build-up will partially absorb some of the initial run-off and once saturated will reduce flow rates through the green roof medium to the outlets and final attenuation storage location.
- **Blue Roofs**: Blue Roofs are designed to hold rainwater at podium level and to release rainwater at a controlled rate via a flow control device. Green Blue roofs that provide attenuation storage area preference of Dublin City Council as set out in DCC's Green and Blue Roof Design Guide. Blue Roofs for the proposed development are to be of the extensive type and are to be a minimum of 150mm. All necessary safety requirements will be incorporated into the design and construction to ensure safe maintenance can occur. The green roof will provide interception and reduction of flowrates at the beginning of the treatment train. After surface water has passed through the Green Roof medium, it will be stored in Blue Roof storage and discharged via a flow control as per specialist design then conveyed to the proposed attenuation tank before being discharged to the existing drainage infrastructure. Soft landscaped podium/roof areas will have typical soil depths of up to 300mm to facilitate grassed areas, plants, shrubs, and trees i.e. similar to a deep intensive green roof build up. Paved areas over podium/ roof will have a free draining material within the build-up and associated drainage board which will reduce the flow rate from these areas slowing run-off at source.
- **Catchpit Manhole**: Catchpit manholes collect silt and debris from the surface water drainage system to prevent blockages and help ensure proper function and reduced maintenance of treatment and storage systems downstream of the catchpit manhole. Catchpit manholes are easily accessible and simple to clean. For these reasons catchpit manholes are recommended to reduce risk of system flooding due to blockages and help the surface water system perform optimally.
- **Petrol Interceptor**: A proprietary oil/water separator which prevents hazardous chemical and petroleum products from entering watercourses and public sewers. There are 2no. petrol interceptors proposed for the development. One

is proposed within the basement of the building for treating incidental run off and before discharge to the proposed foul drainage network. A second has been constructed as part of the adjacent mixed-use development (Planning Ref: 2713/17 & 2737/19).

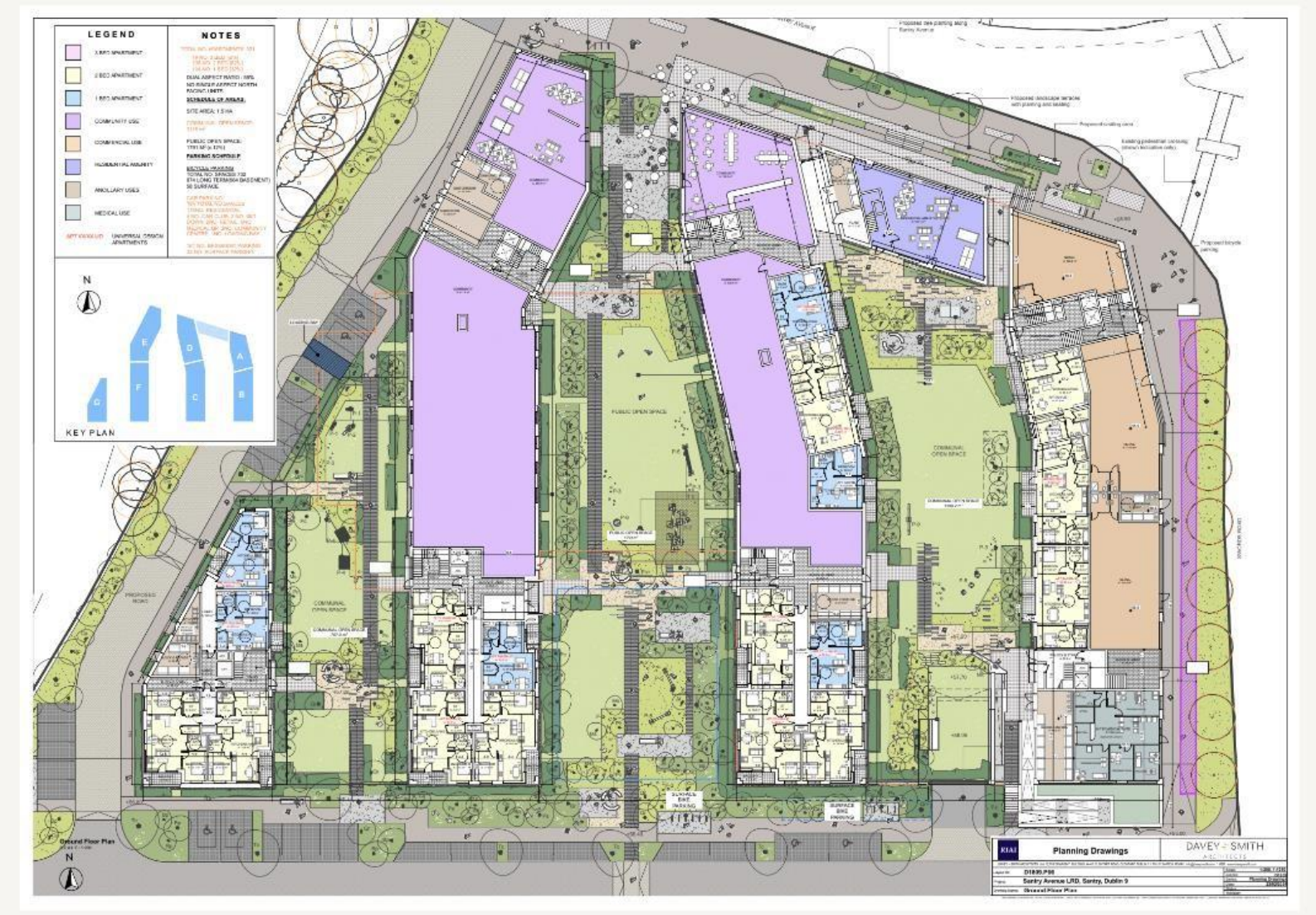

FIGURE 2. SITE LAYOUT PLAN (DAVEY SMITH, DRG NO. D1809.P0)

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs). The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011).

It is the responsibility of each Member State to designate SPAs and SACs, both of which will form part of the Natura 2000 Network, a network of protected sites throughout the European Community. These designated sites are referred to as "Natura 2000 sites" or "European sites". 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 conservation 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 (QIs) and Special Conservation Interests (SCIs) of the sites; from these the conservation objectives of the site are derived.

An AA is a required assessment to determine the likelihood of significant effects, based on best scientific knowledge, of any plans or projects on European sites. A screening for AA determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant effects on a European site, in view of its conservation objectives.

This AA Screening has been undertaken to determine the potential for significant effects on relevant European sites. The purpose of this assessment is to determine, the appropriateness, or otherwise, of the Proposed Development in the context of the conservation objectives of such sites.

2.1.1 Legislative Context

The obligations in relation to AA have been implemented in Ireland under Part XAB of the Planning and Development Act 2000, as amended ("the 2000 Act"), and in particular Section 177U and Section 177V thereof. The relevant provisions of Section 177U in relation to AA screening have been set out below:

"***177U.—*** *(1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.*

(2)…

(3)…

(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is required if it cannot be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.

(5) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is not required if it can be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site."

An AA is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a European site. Paragraph 3 states that:

"*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."*

2.1.2 Recent ruling relating to SuDS as embedded mitigation

According to the ruling delivered in open court in Luxembourg on the 15th June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

"In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site".

As such, standardised embedded mitigation (such as the use of SuDS), that are incorporated into the design of a proposal or project and which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is not to protect a European site, are permitted for consideration during the undertaking of AA.

2.2 Policy Context

2.2.1 Dublin County Development Plan 2022-2028

Policies and objectives of the Dublin City Development Plan 2022 – 2028 that are of relevance to this Screening Report are outlined below:

- **Policy GI9:** To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).
- **Policy GI10:** To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as supporting the favourable conservation condition of any European sites.
- **Policy GI12:** To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.
- **Policy GI13:** To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.

2.2.2 Dublin City Biodiversity Action Plan 2021-2025

Dublin City Biodiversity Action Plan 2021 – 2025 is set out to protect and improve biodiversity through specific objectives:

- **Objective 1:** Ensure effective implementation of the Dublin City Biodiversity Action Plan.
- **Objective 2:** Protect designated sites for nature conservation in accordance with the Conservation Management objectives for Natura 2000 sites and proposed Natural Heritage Areas in Dublin City.
- **Objective 3:** Identify and protect sites that have conservation value for biodiversity using evidence-based research.
- **Objective 4:** Monitor and conserve legally-protected species within Dublin City, particularly those listed in the annexes of the EU Birds and Habitats Directive using evidence-based research.
- **Objective 5:** Prepare and plan for the impacts of climate change on biodiversity.
- **Objective 6:** Implement measures for species with that have a local biodiversity value or impact local biodiversity.
- **Objective 7:** Prepare and disseminate information on guidance for development and site management for biodiversity conservation.
- **Objective 8:** Devise and implement habitat restoration initiatives across Dublin City.
- **Objective 9:** To use nature-based solutions to restore biodiversity and ecosystem services.
- **Objective 10:** Strengthen measures to control Invasive Alien Species (IAS), improve biosecurity and ecological status of catchments.

- **Objective 11:** Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works.
- **Objective 12:** Promote net biodiversity gain and ensure there is no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure.
- **Objective 13:** Pilot initiatives for the creation of habitats using artificial habitat methods.
- **Objective 14:** Minimise and reduce soil degradation in the Dublin City Council administrative area.
- **Objective 15:** Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works.
- **Objective 16:** Empower citizens to connect with, and take positive action for biodiversity at a local and city-wide level.
- **Objective 17:** Strengthen collaboration for the conservation of biodiversity at a regional, national, and global level.

2.3 Stages of Appropriate Assessment

This AA Screening Report (the 'Screening Report') has been prepared by Enviroguide. It considers whether the Proposed Development is likely to have a significant effect on a European site and whether a Stage 2 AA is required.

The AA process is a four-stage process. Each stage requires different considerations, assessments and tests to ultimately arrive at the relevant conclusion for each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

The four stages of an AA, can be summarised as follows:

- **Stage 1: *Screening*.** The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.

- **Stage 2: *Natura Impact Statement (NIS).*** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site(s) despite mitigation, it can only grant consent after proceeding through stages 3 and 4.

- **Stage 3: *Assessment of alternative solutions***. If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out,

despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.

- **Stage 4: *Assessment where no alternative solutions exist and where adverse impacts remain***. The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

The Habitats Directive promotes a hierarchy of avoidance, mitigation, and compensatory measures. First the project should aim to avoid any negative effects on European sites by identifying possible effects early in the planning stage and designing the project to avoid such effects. Second, 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 project is still likely to result in adverse effects, and no further practicable mitigation is possible, a refusal for planning permission may be recommended. In this case, the project will generally only be considered where no alternative solutions are identified and the project is required for IROPI, or, in the case of priority habitats, considerations of health or safety, or beneficial consequences of primary importance for the environment or to other IROPI. Then compensation measures are required for any remaining adverse effects.

3 AA SCREENING METHODOLOGY

3.1 Guidance

This Screening Report has been undertaken in accordance with the following guidance:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision);
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10;
- *Communication from the Commission on the precautionary principle* (European Commission, 2000);
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019);
- *Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC* Brussels, 28.9.2021 C (European Commission, 2021); and
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021.*

3.2 Screening Steps

Screening for AA involves the following steps:

- Establish whether the plan or project is directly connected with or necessary for the management of a European site;
- Description of the baseline existing environment at the Site of the Proposed Development;
- Identification of relevant European site(s) potentially affected;
- Identification and description of potential effects on the relevant European site(s);
- Assessment of the likely significance of the effects identified on the relevant European site(s);
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the European site; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

It should be noted that any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site **have not been considered** as part of this Screening Report.

3.3 Desk Study

A desktop study was carried out in February 2024 to collate and review available information, datasets and documentation sources relevant for the completion of this Screening Report. The desktop study relied on the following sources:

- Information on the network of European Sites, boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at *www.npws.ie*;
- Text summaries of the relevant European sites taken from the respective Standard Data Forms and Site Synopses available at *www.npws.ie*;
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.*gis.epa.ie*;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at *www.gsi.ie*;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the Fingal

County Council online planning database (https://fingalcoco.maps.arcgis.com/apps/webappviewer/index.html?id=3fa7d9df584c4d93aab202638db9dd1a), the Dublin City Council planning database (https://mapzone.dublincity.ie/MapZonePlanning/MapZone.aspx?map=PlanningApplication&search=Plan_Ref&tooltip=Plan_Ref) and the National Planning Database (DHLGH, 2024).

For a complete list of the documents consulted as part of this assessment, see *Section 6 References*.

3.4 Identification of Relevant European Sites

The Zone of Influence (ZOI) for a project is the area over which ecological features may be affected by changes as a result of a development and associated activities. This is likely to extend beyond the development site, for example where there are ecological or hydrological links beyond the site boundaries (CIEEM, 2018). Furthermore, ZOI in relation to European sites is described as follows in the 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021):

> "*The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km).*"

Thus, to identify the European sites that potentially lie within the ZOI of the Proposed Development, a Source-Path-Receptor (S-P-R) method was adopted, as described in OPR PN01 (OPR, 2021). This note was published to provide guidance on screening for AA during the planning process, and although it focuses on the approach a planning authority should take in screening for AA, the methodology is also readily applied in the preparation of Screening Reports such as this.

The relevant European sites were identified based on the following:

- Identification of potential sources of effects based on the Proposed Development description and details, including changes to potentially suitable *ex-situ* habitats at the Site (i.e., habitats utilised by SCI bird species outside of their designated SPAs);
- Use of up-to-date GIS spatial datasets for European designated sites and water catchments – downloaded from the NPWS website (*www.npws.ie*) and the EPA website (*www.epa.ie*) to identify European sites which could potentially be affected by the Proposed Development; and
- Identification of potential pathways between the Site of the Proposed Development and any European sites within the ZOI of any of the identified sources of effects.

- The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any European sites.
- Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any European sites.
- Air and land connectivity assessed based on Proposed Development details and proximity to European sites.
- Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.

- Defining the likely ZOI based on the identified sources of effects and potential pathways between the Proposed Development and any European sites.

3.5 Assessment of Significant Effects

The conservation objectives of the European sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed Development has the potential to have a negative impact on any of the QIs and/or conservation objectives listed for the site.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., "*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*".

The potential for significant effects that may arise from the Proposed Development was considered through the use of key indicators:

- Habitat loss or alteration.
- Habitat/species fragmentation.
- Disturbance and/or displacement of species.
- Changes in population density.
- Changes in water quality and resource.

In addition, information pertaining to the conservation objectives of the European sites, the ecology of the designated habitats and species and known or perceived sensitivities of the habitats and species were considered.

3.6 Limitations

No limitations were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development on the relevant European sites.

4 STAGE 1 SCREENING ASSESSMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology, Geology and Hydrogeology

The Site of the Proposed Development is located within the Liffey and Dublin Bay catchment (Catchment ID: 09) and the Mayne_SC_010 sub-catchment (Sub-catchment ID: 09_17) (EPA, 2024).

The Santry 2nd order River passes approximately 674m north of the Site and continues in an easterly direction for 6.7km before discharging into North Bull Island transitional waterbody. This, in turn, discharges into the Dublin Bay 3.4km further northeast.

The Water Framework Directive (WFD) ecological status of the Santry River is classified as 'Poor' for the 2016-2021 monitoring period and was 'At Risk' of failing to meet its WFD objectives for the same period (EPA, 2024). North Bull Island that that receives waters from the Santry River is of 'Moderate' ecological status and its risk status was under review (EPA, 2024). The ultimate waterbody in this network, Dublin Bay, was of 'Good' ecological status for the 2016-2021 monitoring period and was considered to be 'Not at Risk' of meeting its WFD objectives. (EPA, 2024).

The EPA water quality monitoring data for the stations on the Santry River located closest to the Site are summarised in Table 1. There were no upstream monitoring stations; all monitoring stations in Table 1 are located downstream of the Site. The reported Q-value results indicate that water quality in the Santry River proximal to the Site is 'Poor' to 'Bad'.

TABLE 1. EPA MONITORING STATIONS ON THE SANTRY RIVER AND ASSIGNED Q VALUES.

EPA Monitoring Station name	Station Code	Location from Site	Distance from Site	Assigned Q value
Clonshaugh Rd Br	RS09S010300	Southeast/downstream	1.9km	2-3 (poor)
SANTRY - Harmonstown Rd Br	RS09S010800	Southeast/downstream	6.6km	1 (bad)
Bettyglen	RS09S011100	Southeast/downstream	8.4km	3 (poor)

The Site of the Proposed Development is situated on the Dublin (EU Code: IE_EA_G_008) groundwater body. The Site occurs on a bedrock aquifer mapped as "*Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones*" (LI) (GSI, 2024). The level of vulnerability to groundwater contamination from human activities beneath the Site is 'Low' (GSI, 2024).

The bedrock units underlaying the Site are classified as *Lucan Formation* (Stratigraphic Code: CDLUCN), which comprises *dark limestone & shale* (GSI, 2024). The soil beneath the Site is not mapped. The quaternary sediments beneath the Site are *'Till derived from limestones'* (TLs; GSI, 2024) while the subsoil beneath the Site is mapped as *'Manmade'* (EPA, 2024).

The Waterbody Status for river, groundwater, and coastal water bodies relevant to the Site as recorded by the EPA (2024) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003) are provided in Table 2.

TABLE 2. WFD RISK AND WATER BODY STATUS.

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km)	WFD water body status (2016-2021)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
Santry River	IE_EA_09S010300	Northeast	674m	Poor (2-3)	At Risk	Downstream of Site
Groundwater Bodies						
Dublin	IE_EA_G_008	N/A	N/A	Good	Review	Underlying GWB
Transitional Waterbodies						
North Bull Island	IE_EA_090_0100	Southeast	7.3km	Moderate	Review	Downstream of Site
Tolka Estuary	IE_EA_090_0200	Southeast	7.3km	Poor	At Risk	Downstream of Site (indirect)
Coastal waterbodies						
Dublin Bay	IE_EA_090_0000	Southeast	10.7km	Good	Not at Risk	Downstream of Site

4.1.1.2 Site Drainage

No existing watercourses or drainage ditches are present within the Proposed Development Site. Please refer to Section 1.3.5.2 for further details.

4.2 Identification of Relevant European Sites

4.2.1 Potential Pathways to European Sites

The Proposed Development is not directly connected with or necessary to the management of any European sites. However, the following elements of the Proposed Development were identified and assessed for their potential to cause likely significant effects on European sites within the ZOI.

Construction Phase (*Estimated duration: 5 years*)

- Uncontrolled releases of silt, sediments and/or other pollutants to air due to earthworks.
- Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies.
- Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater.
- Waste generation during the Construction Phase comprising soils, construction and demolition wastes.
- Increased noise, dust and/or vibrations as a result of construction activity.
- Increased dust and air emissions from construction traffic.
- Increased lighting in the vicinity as a result of construction activity.

Operational Phase *(Estimated duration: Indefinite)*

- Surface water drainage from the Site of the Proposed Development.
- Foul water from the Proposed Development leading to increased loading on wastewater treatment plants.
- Increased lighting in the vicinity emitted from the Proposed Development; and
- Increased human presence in the vicinity as a result of the Proposed Development

4.2.1.1 Direct Pathways

4.2.1.1.1 Hydrological pathways

The Santry River passes approximately 674m north of the Site and flows in a southeasterly direction for approximately 6.7km before discharging into North Bull Island lagoon and two European sites covering the area: ***North Dublin Bay SAC (000206)*** and ***North Bull Island SPA (004006)***. Approximately 7.8km further east, North Bull Island and Dublin Bay transition into the Irish Sea, covered in this area by ***North-west Irish Sea SPA (004236)***. Thus, there is a weak hydrological connection between the Proposed Development and these European sites via potential surface runoff to the Santry River during the Construction Phase and surface water drainage during the Operational Phase.

Additionally, Ringsend Wastewater Treatment Plant (WWTP), which will receive foul water discharge from the Proposed Development by means of the Dublin City public sewer system (see Section 1.3.5.1), outflows into Dublin Bay post treatment (see Figure 4). Thus, via foul water channels, there is a potential hydrological connection

between the Proposed Development and the following European sites: ***North Dublin Bay SAC (000206), North Bull Island SPA (004006), South Dublin Bay SAC (001266), South Dublin Bay and River Tolka Estuary SPA (004024),*** and ***North-west Irish Sea SPA (004236)***.

4.2.1.1.2 Hydrogeological pathways

The Site is located above the Dublin groundwater body (GWB). The Dublin GWB is characterised by discharge to the Irish Sea and, to a lesser extent, to surface waters within the GWB (GSI, 2024). The groundwater vulnerability beneath the site is 'Low'.

There are no European sites with groundwater dependent habitats downstream of or sharing surface water pathways with the Proposed Development within the Dublin GWB. ***Rye Water Valley/Carton SAC (001398)*** is located approximately 17.2km southwest of the Site within the Dublin GWB. This site is designated for groundwater-dependent habitats, namely Petrifying springs with tufa formation (*Cratoneurion*) [7220] However, this site is located in the opposite direction of the Proposed Development in terms of GWB flow and is a sufficient distance away. Thus, there are no potential hydrogeological pathways from the Proposed Development to any European sites and therefore no S-P-R connections exist by hydrogeological means.

4.2.1.1.3 Air and land pathways

The intervening distances between the Proposed Development and any European sites (ca.6.2km to closest European Site) is sufficient to exclude the possibility of impact pathways as a result of increased lighting, human presence, noise or dust emissions during the Construction and/or Operational Phase. No S-P-R connection of note exists to European sites via air or land pathways.

4.2.1.2 Indirect Pathways

The Site is comprised almost entirely of buildings and artificial surfaces and surrounded by similar habitat; the Site provides no significant *ex-situ* foraging habitat for any SCI species of European sites within the ZoI.

The roof of the existing warehouse on Site could provide nesting habitat for Herring Gull, which have been recorded nesting on roofs in County Dublin since 1972 (Newton, 2017). However, several factors make it unlikely that this Site provides significant nesting habitat for Herring Gull. First, no Herring Gull individuals were noted utilising the Site during either Site walkover (13th of May, 2021 or 14th of February, 2024). Second, large populations of roof-nesting gulls in County Dublin have been recorded exclusively in Howth, a coastal town (Newton, 2017). Third, the intervening distance between the Proposed Development and the nearest Natura 2000 site for which Herring Gull is an SCI species--***North-west Irish Sea SPA (004236)***, approx. 9.5km southeast—as well as the urban and developed nature of the lands surrounding the Site further reduce this Site's potential importance to nesting Herring Gulls. Taken together, these factors are sufficient to conclude that the Proposed Development will not have a significant impact on roof-nesting populations of Herring Gull associated with ***North-west Irish Sea SPA (004236)***.

Therefore, the Site does not provide any significant suitable *ex-situ* habitat for any SCI species of European sites within the ZoI.

4.2.1.2.1 Collision-risk with birds and buildings

The physical location of buildings and structures can influence the likelihood of bird collisions, with structures placed on or near areas regularly used by large numbers of feeding, breeding, or roosting birds, or on a local flight path, such as those located between important foraging and roosting areas, can present a higher risk of collision.

The Site itself is located in a developed area of Dublin City and is not deemed to be located in close proximity or adjacent to any SPAs designated for waterbird populations, with the closest coastal SPA; the South Dublin Bay and River Tolka Estuary SPA located approx. 6 km to the southeast. As discussed above, there is no significant *ex-situ* feeding/roosting/staging habitat for any SCI species of wintering birds listed for the relevant European sites.

Building Height

The Proposed Development entails a max height of 13 storeys (approx. 40m) in height (See Figure 3). Birds that commute across the city or in order to reach feeding grounds at various locations would tend to fly above this height and once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds flying in the vicinity of the buildings will simply fly around or over them.

With respect to SCI species for SPAs within the ZOI of the Proposed Development, which regularly use or travel over inland areas (i.e. geese, gull species, duck species and a number of waders) in Dublin, they navigate the urban environment with built structures daily. To put some context on some of their avoidance capabilities, in a different setting and for use in collision risk modelling for onshore wind turbines, an avoidance rate of 99.5% is applied for large gull species and an avoidance rate of 99.2% is applied for small gull species (Furness, 2019), which essentially means that 99.5% and 99.2% of gull flights, respectively, will avoid collision with a moving turbine. For Curlew (*Numenius arquata)* the avoidance rate applied is 98% (SNH, 2018). The risk of collision is even less with a static, clearly detectable building.

Building Appearance

The overall façades of the proposed structures are well broken up, with areas of glazing dispersed across a varied material composition (See Figure 3). The opaque materials proposed, such as metal cladding and brick finish, provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. The overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is extremely low. These architectural design features are part of the overall design of the Proposed Development and are not included as specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard.

As such, based on the insignificant heights of the proposed structures and their physical appearance, it is deemed that birds including SCI species do not have the potential to be significantly effected by the Proposed Development through in-flight collisions. While the presence of the Proposed Development might alter flight patterns

of bird species in the area slightly to avoid the proposed building structures, the risk of collision is extremely low. This impact would not result in any population level effect or change in distribution of any species, including any SCI species for SPAs within the ZOI of the Proposed Development.

FIGURE 3 BLOCKSA/BEAST&WESTELEVATION; THE TALLEST STRUCTURE PROPOSED AT CA. 40M IN HEIGHT, SHOWING THE HETEROGENOUS MAKE-UP OF THE BUIDLING FACADES. (SOURCE: DSA: D1089.P20).

4.2.2 Relevant European sites

A European site will only be at risk from likely significant effects where a S-P-R link exists between the Proposed Development Site and the European site. All European sites considered under the S-P-R method are listed in Table 3. None were assessed as having a S-P-R connection of note to the Proposed Development Site.

TABLE 3. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. QUALIFYING INTERESTS (QIS) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (SDF) (EEA, 2024)[1].

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
Special Areas of Conservation (SAC)			
North Dublin Bay SAC (000206)	**Conservation Objectives Version 1.0 (NPWS, 2013a)** • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • Salicornia and other annuals colonising mud and sand [1310] • Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330] • Mediterranean salt meadows (*Juncetalia maritimi*) [1410] • Embryonic shifting dunes [2110] • Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120] • Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] • Humid dune slacks [2190] • *Petalophyllum ralfsii* (Petalwort) [1395]	Ca.7.4km (channel length) southeast	**Construction Phase** A weak direct hydrological connection exists via potential surface runoff, e.g., during a heavy rainfall event, to the Santry River north of the Site and downstream European sites. This is not deemed to be an impact pathway capable of facilitating likely significant effects to this SAC and no direct or indirect effects are therefore foreseen. **Operational Phase** A weak direct hydrological connection exists via potential surface runoff, e.g., during a heavy rainfall event, to the Santry River north of the Site and downstream European sites. An indirect hydrological connection exists via treated foul water discharge from the Ringsend WWTP. These are not deemed to be impact pathways capable of facilitating likely significant effects to this SAC and no further direct or indirect effects are foreseen.

[1] The full species list included in this table is as per the latest updated information as indicated, so either the Conservation Objectives (CO) document for the site, or the latest Standard Data Form (SDF) (EEA, 2024). For SDF updates, CO are not yet available for the newly added species but are assumed, for the purposes of assessment, to follow the same format as for other feature species.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
South Dublin Bay SAC (000210)	**Conservation Objectives Version 1.0 (NPWS, 2013d)** • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • Salicornia and other annuals colonising mud and sand [1310] • Embryonic shifting dunes [2110]	Ca.7.8km southeast	**Construction Phase** No direct or indirect connections exist between the Proposed Development and this European site during the construction phase. **Operational Phase** An indirect hydrological connection exists via treated foul water discharge from the Ringsend WWTP. This is not deemed to be an impact pathway capable of facilitating likely significant effects to this SAC and no further direct or indirect effects are foreseen.
Rye Water Valley/Carton SAC (001398)	**Conservation Objectives Version 1.0 (NPWS, 2021)** • Petrifying springs with tufa formation (*Cratoneurion*) [7220] • *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014] • *Vertigo moulinsiana* (Desmoulin's Whorl Snail) [1016]	Ca. 17.2km southwest	No direct or indirect connections exist between the Proposed Development and this European site
Special Protection Areas (SPA)			
North Bull Island SPA (004006)	**Conservation Objectives Version 1.0 (NPWS, 2015a)** • Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Shelduck (*Tadorna tadorna*) [A048] • Teal (*Anas crecca*) [A052] • Pintail (*Anas acuta*) [A054] • Shoveler (*Anas clypeata*) [A056] • Oystercatcher (*Haematopus ostralegus*) [A130] • Golden Plover (*Pluvialis apricaria*) [A140] • Grey Plover (*Pluvialis squatarola*) [A141] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144]	Ca.7.4km (channel length) southeast	**Construction Phase** A weak direct hydrological connection exists via potential surface runoff, e.g., during a heavy rainfall event, to the Santry River north of the Site and downstream European sites. This is not deemed to be an impact pathway capable of facilitating likely significant effects to this SPA and no further direct or indirect effects are foreseen. **Operational Phase** A weak direct hydrological connection exists via potential surface runoff, e.g., during a heavy rainfall event, to the Santry River north of the Site and downstream European sites. An indirect hydrological connection exists via treated foul water

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
	• Dunlin (*Calidris alpina*) [A149] • Black-tailed Godwit (*Limosa limosa*) [A156] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Curlew (*Numenius arquata*) [A160] • Redshank (*Tringa totanus*) [A162] • Turnstone (*Arenaria interpres*) [A169] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Wetland and Waterbirds [A999]		discharge from the Ringsend WWTP. These are not deemed to be impact pathways capable of facilitating likely significant effects to this SPA and no further direct or indirect effects are foreseen.
South Dublin Bay and River Tolka Estuary SPA (004024)	**Conservation Objectives Version 1.0 (NPWS, 2015c)** • Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Oystercatcher (*Haematopus ostralegus*) [A130] • Ringed Plover (*Charadrius* hiaticula) [A137] • Grey Plover (*Pluvialis squatarola*) [A141] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*) [A149] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Redshank (*Tringa totanus*) [A162] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Wetland and Waterbirds [A999]	Ca.6.6km southeast	**Construction Phase** No direct or indirect connections exist between the Proposed Development and this European site during the construction phase. **Operational Phase** An indirect hydrological connection exists via treated foul water discharge from the Ringsend WWTP. This is not deemed to be an impact pathway capable of facilitating likely significant effects to this SPA and no further direct or indirect effects are foreseen.
North-west Irish Sea SPA (004236)	**Conservation Objectives Version 1.0 (NPWS, 2023a)** • Red-throated Diver (*Gavia stellata*) [A001] • Great Northern Diver (*Gavia immer*) [A003]	Ca.15.2km (channel length) southeast	**Construction Phase** A weak direct hydrological connection exists via potential surface runoff, e.g., during a heavy rainfall event, to the Santry River

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Potential Pathways and Impacts
	• Fulmar (*Fulmarus glacialis*) [A009] • Manx Shearwater (*Puffinus puffinus*) [A013] • Cormorant (*Phalacrocorax carbo*) [A017] • Shag (*Phalacrocorax aristotelis*) [A018] • Common Scoter (*Melanitta nigra*) [A065] • Little Gull (*Larus minutus*) [A177] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Common Gull (*Larus canus*) [A182] • Lesser Black-backed Gull (*Larus fuscus*) [A183] • Herring Gull (*Larus argentatus*) [A184] • Great Black-backed Gull (*Larus marinus*) [A187] • Kittiwake (*Rissa tridactyla*) [A188] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Little Tern (*Sterna albifrons*) [A195] • Guillemot (*Uria aalge*) [A199] • Razorbill (*Alca torda*) [A200] • Puffin (*Fratercula arctica*) [A204]		north of the Site and downstream European sites. No further direct or indirect effects are foreseen. **Operational Phase** A weak direct hydrological connection exists via potential surface runoff, e.g., during a heavy rainfall event, to the Santry River north of the Site and downstream European sites. An indirect hydrological connection exists via treated foul water discharge from the Ringsend WWTP. This is not deemed to be an impact pathway capable of facilitating likely significant effects to this SPA and no further direct or indirect effects are foreseen.

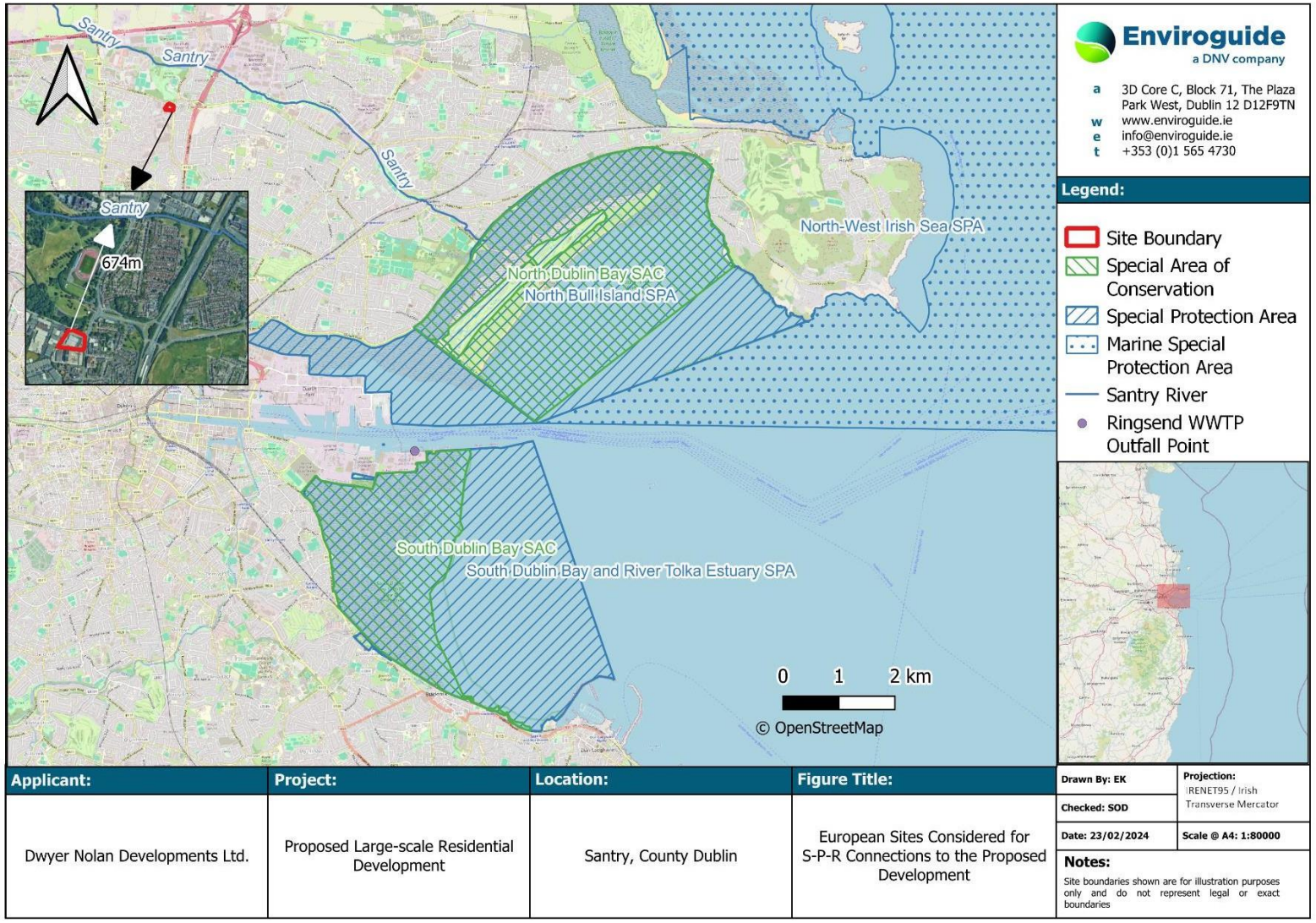

FIGURE 4: LOCATION OF EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT

4.2.2.1 North Dublin Bay SAC

The following description of the North Dublin Bay SAC is extracted from the Site Synopsis (NPWS, 2013b) for the site:

"North Bull Island is a sandy spit which formed after the building of the South Wall and Bull Wall in the 18th and 19th centuries. It now extends for about 5 km in length and is up to 1 km wide in places. A well-developed and dynamic dune system stretches along the seaward side of the island. Various types of dunes occur, from fixed dune grassland to pioneer communities on foredunes. Marram Grass (Ammophila arenaria) is dominant on the outer dune ridges, with Lyme-grass (Leymus arenarius) and Sand Couch (Elymus farctus) on the foredunes. Behind the first dune ridge, plant diversity increases with the appearance of such species as Wild Pansy (Viola tricolor), Kidney Vetch (Anthyllis vulneraria), Common Bird's-foot-trefoil (Lotus corniculatus), Common Restharrow (Ononis repens), Yellow-rattle (Rhinanthus minor) and Pyramidal Orchid (Anacamptis pyramidalis). In these grassy areas and slacks, the scarce Bee Orchid (Ophrys apifera) occurs.

About 1 km from the tip of the island, a large dune slack with a rich flora occurs, usually referred to as the 'Alder Marsh' because of the presence of Alder trees (Alnus glutinosa). The water table is very near the surface and is only slightly brackish. Saltmarsh Rush (Juncus maritimus) is the dominant species, with Meadowsweet (Filipendula ulmaria) and Devil's-bit Scabious (Succisa pratensis) being frequent. The orchid flora is notable and includes Marsh Helleborine (Epipactis palustris), Common Twayblade (Listera ovata), Autumn Lady's-tresses (Spiranthes spiralis) and Marsh Orchids (Dactylorhiza spp.)."

The following description of the site is extracted from the relevant Conservation Objectives Supporting Document (NPWS, 2013c):

"North Dublin Bay SAC covers the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall Lighthouse across to the Martello Tower at Howth Head. The North Bull Island is the focal point of the site. The island is a sandy spit which formed after the building of the South Wall and Bull Wall in the 18th and 19th centuries. It now extends for about 5km in length and is up to 1km wide in places. The island supports a well developed dune system including a large dune slack, and saltmarsh which extends along the length of the landward side of the island. The island is separated from the mainland by intertidal mud and sandflats and is split into two sections by the Bull Island causeway, which also divides the intertidal areas."

4.2.2.2 South Dublin Bay SAC

The following description of the South Dublin Bay SAC is extracted from the Site Synopsis (NPWS, 2015b) for the site:

"The bed of Dward Eelgrass (Zostera noltii) found below Merrion Gates is the largest stand on the east coast. Green algae (Enteromorpha spp. and Ulva lactuca) are distributed throughout the area at a low density. Fucoid algae occur on the rocky shore

in the Maretimo to Dún Laoghaire area. Species include Fucus spiralis, F. vesiculosus, F. serratus, Ascophyllum nodosum and Pelvetia canaliculata.

Several small, sandy beaches with incipient dune formation occur in the northern and western sectors of the site, notably at Poolbeg, Irishtown and Merrion/ Booterstown. The formation at Booterstown is very recent. Drift line vegetation occurs in association with the embryonic and incipient fore dunes. Typically drift lines occur in a band approximately 5 m wide, though at Booterstown this zone is wider in places. The habitat occurs just above the High Water Mark and below the area of embryonic dune. Species present are Sea Rocket (Cakile maritima), Frosted Orache (Atriplex laciniata), Spear-leaved Orache (A. prostrata), Prickly Saltwort (Salsola kali) and Fat Hen (Chenopodium album). Also occurring is Sea Sandwort (Honkenya peploides), Sea Beet (Beta vulgaris subsp. maritima) and Annual Sea-blite (Suaeda maritima). A small area of pioneer saltmarsh now occurs in the lee of an embryonic sand dune just north of Booterstown Station. This early stage of saltmarsh development is here characterised by the presence of pioneer stands of glassworts (Salicornia spp.) occurring below an area of drift line vegetation. As this is of very recent origin, it covers a small area but ample areas of substrate and shelter are available for the further development of this habitat".

4.2.2.3 North Bull Island SPA

The following description of the North Bull Island SPA is extracted from the Site Synopsis (NPWS, 2014a) for the site:

"This site covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head. The North Bull Island sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port during the 18th and 19th centuries. It is almost 5 km long and 1 km wide and runs parallel to the coast between Clontarf and Sutton. Part of the interior of the island has been converted to golf courses.

Saltmarsh extends along the length of the landward side of the island and provides the main roost site for wintering birds in Dublin Bay. The island shelters two intertidal lagoons which are divided by a solid causeway. These lagoons provide the main feeding grounds for the wintering waterfowl. The sediments of the lagoons are mainly sands with a small and varying mixture of silt and clay. Green algal mats (Ulva spp.) are a feature of the flats during summer. These sediments have a rich macro-invertebrate fauna, with high densities of Lugworm (Arenicola marina) and Ragworm (Hediste diversicolor)".

The following description of the site is extracted from the relevant Conservation Objectives Supporting Document (NPWS, 2014b) for the site:

"North Bull Island Special Protection Area, and South Dublin Bay and River Tolka Estuary Special Protection Area, are two designated SPAs located in Dublin Bay.

The site designated as North Bull Island Special Protection Area covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head.

North Bull Island lies roughly parallel to the shore and is a low-lying sandy spit, about 4.85 km long and 0.70 km wide (McCorry & Ryle, 2009a). It is a relatively recent geomorphological feature having emerged as a result of the build up of sediment over the last 200 years following the construction of the South and North Bull walls during the 18th and 19th centuries. The North Bull Wall marks the southern boundary of the island and is connected to the mainland by a wooden bridge. The island is actively accreting (Ryle et al. 2009a). A sandy beach, Dollymount Strand, occurs on the seaward side of the island and intertidal mudflats occur on the inner (mainland side) fringed by saltmarsh. A causeway built in 1965 provides the main access to the island and divides the intertidal flats into two areas known as the North and South Bull lagoons. Both of these are covered completely by most tides and are drained by permanent channels; the southern lagoon fills and empties beneath Bull Bridge, while water in the northern lagoon is channelled in and out through Sutton Creek (Harris, 1977). These lagoons provide the main feeding grounds for the wintering waterfowl while the fringing saltmarsh provides the main roost site for wintering birds in Dublin Bay. Macroalgal mats of filamentous Ulva spp. (formerly Enteromorpha spp.) 1 are prevalent".

4.2.2.4 South Dublin Bay and River Tolka Estuary SPA

The following description of the South Dublin Bay and River Tolka Estuary SPA is extracted from the Site Synopsis (NPWS, 2015d) for the Site:

"The South Dublin Bay and River Tolka Estuary SPA comprises a substantial part of Dublin Bay. It includes the intertidal area between the River Liffey and Dun Laoghaire, and the estuary of the River Tolka to the north of the River Liffey, as well as Booterstown Marsh. A portion of the shallow marine waters of the bay is also included.

In the south bay, the intertidal flats extend for almost 3 km at their widest. The sediments are predominantly well-aerated sands. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. The landward boundary is now almost entirely artificially embanked. There is a bed of Dwarf Eelgrass (Zostera noltii) below Merrion Gates which is the largest stand on the east coast. Green algae (Ulva spp.) are distributed throughout the area at a low density. The macroinvertebrate fauna is well-developed, and is characterised by annelids such as Lugworm (Arenicola marina), Nephthys spp. and Sand Mason (Lanice conchilega), and bivalves, especially Cockle (Cerastoderma edule) and Baltic Tellin (Macoma balthica). The small gastropod Spire Shell (Hydrobia ulvae) occurs on the muddy sands off Merrion Gates, along with the crustacean Corophium volutator. Sediments in the Tolka Estuary vary from soft thixotrophic muds with a high organic content in the inner estuary to exposed, well-aerated sands off the Bull Wall. The site includes Booterstown Marsh, an enclosed area of saltmarsh and muds that is cut off from the sea by the Dublin/Wexford railway line, being linked only by a channel to the east, the Nutley stream. Sea water incursions into the marsh occur along this stream at high tide. An area of grassland at Poolbeg, north of Irishtown Nature Park, is also included in the site".

The following description of the site is extracted from the relevant Conservation Objectives Supporting Document (NPWS, 2014c):

"North Bull Island Special Protection Area, and South Dublin Bay and River Tolka Estuary Special Protection Area, are two designated SPAs located in Dublin Bay.

The site designated as North Bull Island Special Protection Area covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head.

North Bull Island lies roughly parallel to the shore and is a low-lying sandy spit, about 4.85 km long and 0.70 km wide (McCorry & Ryle, 2009a). It is a relatively recent geomorphological feature having emerged as a result of the build up of sediment over the last 200 years following the construction of the South and North Bull walls during the 18th and 19th centuries. The North Bull Wall marks the southern boundary of the island and is connected to the mainland by a wooden bridge. The island is actively accreting (Ryle et al. 2009a). A sandy beach, Dollymount Strand, occurs on the seaward side of the island and intertidal mudflats occur on the inner (mainland side) fringed by saltmarsh. A causeway built in 1965 provides the main access to the island and divides the intertidal flats into two areas known as the North and South Bull lagoons. Both of these are covered completely by most tides and are drained by permanent channels; the southern lagoon fills and empties beneath Bull Bridge, while water in the northern lagoon is channelled in and out through Sutton Creek (Harris, 1977). These lagoons provide the main feeding grounds for the wintering waterfowl while the fringing saltmarsh provides the main roost site for wintering birds in Dublin Bay. Macroalgal mats of filamentous Ulva spp. (formerly Enteromorpha spp.) are prevalent".

4.2.2.5 North-west Irish Sea SPA (004236)

The following description of the North-west Irish Sea SPA is extracted from the Site Synopsis (NPWS, 2023b) for the Site:

"*The North-west Irish Sea cSPA constitutes an important resource for marine birds. The estuaries and bays that open into it along with connecting coastal stretches of intertidal and shallow subtidal habitats, provide safe feeding and roosting habitats for waterbirds throughout the winter and migration periods. These areas, along with more pelagic marine waters further offshore, provide additional supporting habitats (for foraging and other maintenance behaviours) for those seabirds that breed at colonies on the north-west Irish Sea's islands and coastal headlands. These marine areas are also important for seabirds outside the breeding period.*

This SPA extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km2 in area.

This SPA is ecologically connected to several existing SPAs in this area. The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Common Scoter, Red-throated Diver, Great Northern Diver, Fulmar, Manx Shearwater, Shag, Cormorant, Little Gull, Kittiwake, Black-headed Gull, Common Gull, Lesser Black-backed Gull, Herring Gull, Great Black-

backed Gull, Little Tern, Roseate Tern, Common Tern, Arctic Tern, Puffin, Razorbill and Guillemot.

The breeding seabird species listed for those SPAs, which abut the North-West Irish Sea SPA are: Fulmar (Lambay Island SPA); Cormorant (Skerries Island SPA; Ireland's Eye SPA; Lambay Island SPA); Shag (Skerries Island SPA; Lambay Island SPA); Lesser Black-backed Gull (Lambay Island SPA); Herring Gull (Skerries Island SPA; Ireland's Eye SPA; Lambay Island SPA); Kittiwake (Lambay Island SPA; Ireland's Eye SPA; Howth Head SPA); Roseate Tern (Rockabill SPA); Common Tern (Rockabill SPA;); Arctic Tern (Rockabill SPA); Little Tern (Boyne Estuary SPA); Guillemot (Lambay Island SPA, Ireland's Eye SPA); Razorbill (Lambay Island SPA, Ireland's Eye SPA); and Puffin (Lambay Island SPA). The Common Tern population that is listed for the nearby South Dublin Bay and River Tolka Estuary SPA is also likely to use this SPA as a foraging resource.

Informed by two surveys of the western Irish Sea region in 2016 an estimated 120,232 and 34,626 individual marine birds occurred in this SPA during autumn and winter respectively. Those marine bird species whose estimated abundances equalled or exceeded 1% of the total estimated size of the winter assemblage are: Red-throated Diver (538), Fulmar (506), Little Gull (391), Kittiwake (944), Black-headed Gull (508), Common Gull (2,866), Herring Gull (6,893), Great Black-backed Gull (2,096), Razorbill (4,638) and Guillemot (13,914).

The estimated 2016 summer abundance of Manx Shearwater in the North West Irish Sea SPA is 13,010 and is of international importance. The estimated 2016 autumn and winter abundances of Great Northern Diver in the North West Irish Sea SPA is 248 and 230 respectively and are of international importance. The estimated abundances of Common Scoter over parts of this SPA can reach significant numbers (e.g. 14,567 in December 2018) which is also of international importance."

4.2.2.6 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the relevant European site(s) are detailed in Table 4 Table 4. Qualifying Interests (QIS) / Special Conservation Interests (SCIS) and their conservation objectives for the relevant European sites. The conservation status of each QI / SCI was sourced from the relevant Standard Data Form(S) (SOURCE: EEA (2024)). below.

TABLE 4. QUALIFYING INTERESTS (QIS) / SPECIAL CONSERVATION INTERESTS (SCIS) AND THEIR CONSERVATION OBJECTIVES FOR THE RELEVANT EUROPEAN SITES. THE CONSERVATION STATUS OF EACH QI / SCI WAS SOURCED FROM THE RELEVANT STANDARD DATA FORM(S) (SOURCE: EEA (2024) [2]).

QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
North Dublin Bay SAC (000206)		

[2] The full QI/SCI list included in this table is as per the latest updated information as indicated in Table 3 on page 28. For SDF updates where CO are not yet available for the newly added species they are assumed, for the purposes of assessment, to follow the same format as for other feature species.

1140 Mudflats and sandflats not covered by seawater at low tide	Good	To maintain the favourable conservation condition of these habitats
1210 Annual vegetation of drift lines	Good	To restore the favourable conservation condition of these habitats
1310 *Salicornia* and other annuals colonising mud and sand	Excellent	To restore the favourable conservation condition of these habitats
1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	N/A	To maintain the favourable conservation condition of these habitats
1410 Mediterranean salt meadows (*Juncetalia maritimi*)	Good	To maintain the favourable conservation condition of these habitats
2110 Embryonic shifting dunes	Good	To restore the favourable conservation condition of these habitats
2120 Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	Excellent	To restore the favourable conservation condition of these habitats
2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)	Good	To restore the favourable conservation condition of these habitats
2190 Humid dune slacks	Excellent	To restore the favourable conservation condition of these habitats
1395 *Petalophyllum ralfsii* (Petalwort)	Excellent	To maintain the favourable conservation condition of these habitats
South Dublin Bay SAC (000210)		
1140 Mudflats and sandflats not covered by seawater at low tide	Good	To maintain the favourable conservation condition of these habitats
1210 Annual vegetation of drift lines	Good	N/A
1310 *Salicornia* and other annuals colonising mud and sand	Good	
2110 Embryonic shifting dunes	Good	
North Bull Island SPA (004006)		
A046 Light-bellied Brent Goose (*Branta bernicla hrota*)	Excellent	To maintain the favourable conservation condition of this species
A048 Shelduck (*Tadorna tadorna*)	Excellent	To maintain the favourable conservation condition of this species

A052Teal (*Anas crecca*)	Excellent	To maintain the favourable conservation condition of this species
A054 Pintail (*Anas acuta*)	Excellent	To maintain the favourable conservation condition of this species
A056 Shoveler (*Anas clypeata*)	Excellent	To maintain the favourable conservation condition of this species
A130 Oystercatcher (*Haematopus ostralegus*)	Excellent	To maintain the favourable conservation condition of this species
A140 Golden Plover (*Pluvialis apricaria*)	Good	To maintain the favourable conservation condition of this species
A141 Grey Plover (*Pluvialis squatarola)*	Excellent	To maintain the favourable conservation condition of this species
A143 Knot (*Calidris canutus*)	Excellent	To maintain the favourable conservation condition of this species
A144 Sanderling (*Calidris alba*)	Excellent	To maintain the favourable conservation condition of this species
A149 Dunlin (*Calidris alpina*)	Excellent	To maintain the favourable conservation condition of this species
A156 Black-tailed Godwit (*Limosa limosa*)	Excellent	To maintain the favourable conservation condition of this species
A157 Bar-tailed Godwit (*Limosa lapponica*)	Excellent	To maintain the favourable conservation condition of this species
A160 Curlew (*Numenius arquata*)	Excellent	To maintain the favourable conservation condition of this species
A162 Redshank (*Tringa totanus*)	Excellent	To maintain the favourable conservation condition of this species
Turnstone (*Arenaria interpres*)	Excellent	To maintain the favourable conservation condition of this species
A179 Black-headed Gull (*Chroicocephalus ridibundus*)	Excellent	To maintain the favourable conservation condition of this species
A999 Wetland and Waterbirds	N/A	To maintain the favourable conservation condition of this species

South Dublin Bay and River Tolka Estuary SPA (004024)		
A046 Light-bellied Brent Goose (*Branta bernicla hrota*)	Excellent	To maintain the favourable conservation condition of this species
A130 Oystercatcher (*Haematopus ostralegus*)	Good	To maintain the favourable conservation condition of this species
A137 Ringed Plover (*Charadrius hiaticula*)	Good	To maintain the favourable conservation condition of this species
A141 Grey Plover (*Pluvialis squatarola*)	Good	Not set for this species
A143 Knot (*Calidris canutus*)	Good	To maintain the favourable conservation condition of this species
A144 Sanderling (*Calidris alba*)	Excellent	To maintain the favourable conservation condition of this species
A149 Dunlin (*Calidris alpina*)	Good	To maintain the favourable conservation condition of this species
A157 Bar-tailed Godwit (*Limosa lapponica*)	Good	To maintain the favourable conservation condition of this species
A162 Redshank (*Tringa totanus*)	Good	To maintain the favourable conservation condition of this species
A179 Black-headed Gull (*Chroicocephalus ridibundus*)	Good	To maintain the favourable conservation condition of this species
A192 Roseate Tern (*Sterna dougallii*)	Excellent	To maintain the favourable conservation condition of this species
A193 Common Tern (*Sterna hirundo*)	Excellent	To maintain the favourable conservation condition of this species
A194 Arctic Tern (*Sterna paradisaea*)	Excellent	To maintain the favourable conservation condition of this species
A999 Wetland and Waterbirds	N/A	To maintain the favourable conservation condition of this species
North-west Irish Sea SPA (004236)		
Red-throated Diver (*Gavia stellata*) [A001]		To maintain the favourable conservation condition of these species at North-west Irish Sea SPA
Great Northern Diver (*Gavia immer*) [A003]		
Fulmar (*Fulmarus glacialis*) [A009]		To restore the favourable conservation condition of this species at North-west

	Not available[3]	Irish Sea SPA
Manx Shearwater (*Puffinus puffinus*) [A013]		To maintain the favourable conservation condition of these species at North-west Irish Sea SPA
Cormorant (*Phalacrocorax carbo*) [A017]		To restore the favourable conservation condition of these species at North-west Irish Sea SPA
Shag (*Phalacrocorax aristotelis*) [A018]		
Common Scoter (*Melanitta nigra*) [A065]		To maintain the favourable conservation condition of this species at North-west Irish Sea SPA
Little Gull (*Larus minutus*) [A177]		Not listed
Black-headed Gull (*Chroicocephalus ridibundus*) [A179]		To maintain the favourable conservation condition of these species at North-west Irish Sea SPA
Common Gull (*Larus canus*) [A182]		
Lesser Black-backed Gull (*Larus fuscus*) [A183]		
Herring Gull (*Larus argentatus*) [A184]		To restore the favourable conservation condition of this species at North-west Irish Sea SPA
Great Black-backed Gull (*Larus marinus*) [A187]		To maintain the favourable conservation condition of this species at North-west Irish Sea SPA
Kittiwake (*Rissa tridactyla*) [A188]		To restore the favourable conservation condition of this species at North-west Irish Sea SPA
Roseate Tern (*Sterna dougallii*) [A192]		To maintain the favourable conservation condition of these species at North-west Irish Sea SPA
Common Tern (*Sterna hirundo*) [A193]		
Arctic Tern (*Sterna paradisaea*) [A194]		
Little Tern (*Sterna albifrons*) [A195]		
Guillemot (*Uria aalge*) [A199]		
Razorbill (*Alca torda*) [A200]		
Puffin (*Fratercula arctica*) [A204]		To restore the favourable conservation condition of this species at North-west Irish Sea SPA

4.3 Assessment of Likely Significant Effects

The following sections discuss the potential for likely significant effects on the relevant European site(s), taking into consideration the QIs, SCIs and SSCOs (where available), and assesses whether the Proposed Development has the capacity to adversely affect the integrity of this European site. Furthermore, due consideration shall be given to species not formally identified but which may be present within ***North Dublin Bay SAC (000206), North Bull Island SPA (004006), South Dublin Bay SAC (001266), South Dublin Bay and River Tolka Estuary SPA (004024),*** and ***North-west Irish Sea SPA (004236)*** and adversely affected by the Proposed Development,

[3] Conservation status details for these SCI species are not yet available as North-west Irish Sea was granted SPA status recently. The site conservation objectives are used for the purposes of this assessment.

provided that those potential effects are likely to contravene the conservation objectives of the designated sites. The potential for significant effects that may arise from the Proposed Development was considered through the use of key indicators as detailed in Section 3.5.

4.3.1 Habitat Loss or Alteration

The Proposed Development is not located within or immediately adjacent to any European sites. Therefore, there is no potential for direct habitat loss or alteration to occur as a result of the construction or operation of the Proposed Development.

The loss or alteration of water-dependent QI habitats and the loss of usable habitat for aquatic SCI species is also possible indirectly through deterioration of water quality and resource. Any such potential impacts are considered in Section 4.3.3 Changes in Water Quality and Resource.

4.3.2 Habitat Fragmentation

As the Proposed Development does not have the potential to directly cause habitat loss or alteration, it likewise will not result in direct habitat fragmentation.

The potential for indirect habitat fragmentation through deterioration of water quality and resource is further considered in Section 4.3.3 Changes in Water Quality and Resource.

4.3.3 Changes in Water Quality and Resource

Surface Water

The Site will be served by the public surface water sewer system. According to the Greater Dublin Strategic Drainage Study (2015), the Site is within the Santry River S1002 drainage catchment and as such the surface water network ultimately discharges to the Santry River, which in turn discharges to North Dublin Bay.

The potential for surface water generated at the Site of the Proposed Development to reach the European Sites in Dublin Bay and cause likely significant effects, during the Construction and/or Operational Phases, is deemed to be negligible due to:

- The lack of any surface water bodies in the immediate vicinity of the Proposed Development Site and the built-up nature of the intervening lands between the Site and the Santry River to the north.
- The distance and consequent potential for dilution in the receiving public sewer system, the Santry River and eventually Dublin Bay. Surface water discharges would have to travel over 6 river km along the Santry River before discharging into Dublin Bay.
- The low volume of any potential surface water run-off relative to the volume of the receiving Santry River and Dublin Bay.

In addition, the Proposed Development incorporates comprehensive SUDS measures (see section 1.3.5.2.1) to treat and attenuate surface water runoff. During the

Operational Phase, the SUDS designs incorporated into the Proposed Development will further reduce the already negligible potential for surface water impacts to European sites. No potential for impacts to water quality and resource exists for European sites from surface water runoff or drainage from the Proposed Development.

Foul water

The Proposed Development will be served by separate foul water and surface water sewers during its Operational Phase. It is noted that there is a weak indirect hydrological pathway between the Site and European sites in Dublin Bay via this sewerage network, which will eventually be processed and treated at Ringsend WwTP prior to discharge to Dublin Bay. The main area of dispersal of the treated effluent from Ringsend WwTP is in the Tolka Basin and around North Bull Island.

However, the potential for foul waters generated at the Site of the Proposed Development to reach these European sites within Dublin Bay and cause significant effects, during the Construction and Operational Phases, is deemed to be negligible due to the following reasons:

- The ongoing upgrade works to Ringsend WwTP which will increase the capacity of the facility from 1.6 million Population Equivalent (PE) to 2.4 million PE (see section 4.3.6.3 below for more details).
- It is considered that effects on marine biodiversity and the European sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 4.3.6.3 for more details).
- The main area of dispersal of the treated effluent from Ringsend WwTP is in the Tolka Basin and around North Bull Island. South Dublin Bay is unaffected by the effluent from the plant (Irish Water, 2018).
- The increase of the PE load at the facility as a result of the Proposed Development, assuming each PE unit was not previously supported by the WwTP, is considered to be an insignificant increase in terms of the overall scale of the facility. The increased load does not have the capacity to alter the effluent released from the WwTP to such an extent as to result in likely significant effects on European sites in Dublin Bay. The potential for in-combination effects relating to foul water treatment at Ringsend WwTP is discussed in section 4.3.6.3.

4.3.4 Disturbance and/or Displacement of Species

As outlined in section 4.3.3 above, the hydrological link between the Site and the European Sites within Dublin Bay will not result in significant effects on the water quality and resource indicator during both the Construction and Operational Phases. As such, QI/SCI species within the European Sites will not be affected by water quality impacts.

The Site of the Proposed Development does not provide any significant suitable *ex-situ* habitat for SCI species of any nearby SPAs and no likely significant effects associated with disturbance or displacement of SCI species are likely to occur.

4.3.5 Changes to Population Density

For the reasons outlined above, the Proposed Development does not have the capacity to cause any significant changes in the population density of any species within any European Site.

4.3.6 Potential for In-combination Effects

4.3.6.1 Existing and Current Planning Permissions

A search of planning applications located within the ZOI of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie), Fingal County Council and Dublin City Council Planning Applications online map databases. Any planning applications listed as granted or decision pending from within the last five years (2019-2024) within 500m of the Proposed Development Site were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

It is noted that most developments in the vicinity of the Site of the Proposed Development are small scale in nature and include provisions for new signage at a nearby Lidl supermarket, retention of small-scale buildings, and change of use applications without significant required works.

TABLE 5. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 500 M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
Ref 2713/17, Ref 2737/19, Ref 4549/22	Dublin City Council	Grant Permission (28/03/2018, 22/08/2019, 9/1/2023 respectively).	Santry Avenue and Swords Road, Santry, Dublin 9. (Adjacent to the Proposed Development)
Development Description Three applications are associated with the above development. Each application is described below. Ref 2713/17: The proposed development (c.25,083 sq.m m total gfa above basement car park, and excluding plant, bin stores and bike stores), generally comprises: the partial demolition (c.7,781 sq.m m gfa) of an existing 8-bay warehouse (c.9,539 sq.m m gfa), and the construction of: 1 no. 5-storey mixed use building fronting Swords Road (Block A: c.5,932 sq.m m gfa in total), including 3 no. retail/commercial units (c.502 sq.m m) at ground level and 48 no. residential units in levels above; 1 no. 5-storey residential building (Block B: c.5,233 sq.m m gfa, 47 no. residential units); 1 no. 5-storey mixed use building (Block C:c.5,383 sq.m m gfa in total), including 2 no. office units (c.373 sq.m m gfa) and 1 no. crèche (c.331 sq.m m gfa) at ground floor, and 42 no. residential units from ground to 4th floor levels; the refurbishment of the partially retained and reclad double height warehouse (2-bays, 1,758 sq.m m gfa) with new 4-storey extension, to accommodate commercial office use (Block D: c.6,733 sq.m m gfa in total); and a new 4-storey commercial office building (Block E: c.1,802 sq.m m gfa in total); The proposed development accommodates 137 no. residential units in total (25 no. 3-bed, 88 no. 2-bed and 24 no. 1-			

bed); And all ancillary and associated site development works, including: new vehicular and pedestrian access via Swords Road at the north east corner of the site, and environmental improvements along the Swords Road frontage; upgrading of existing vehicular and pedestrian access via Santry Avenue; new basement car park (c.3,988 sq.m m) accessed via ramp under Block A accommodating 122 no. car parking spaces (to include 6 no. disabled access), 100 no. bicycle parking spaces, plant, etc.; 151 no. surface car parking spaces (to include 7 no. disabled access); 100 no. surface bicycle spaces; bin storage at ground level in Blocks B and C; surface water attenuation tank; and, hard and soft landscaping, lighting and boundary treatment works; all on a site of c. 1.9Ha.

Ref 2737/19: Permission for development, consisting of modifications to a permitted mixed use development under Ref. 2713/17, located at Santry Avenue and Swords Road, Santry, Dublin 9. Permission is sought to increase the height of Blocks A, B and C from permitted 5 storeys to proposed 7 storeys and for a change in unit type and increase in number of apartments i.e. 70 no. apartments, which will result in a change from 137 no. permitted apartments to 207 no. 1, 2 & 3 bed apartments in the aforementioned buildings, including provision of balconies and roof terraces (i.e. 240sq.m. each) to Blocks A, B & C. The ground floor of Block C will accommodate a unit (i.e. 210sq.m.) for community use in compliance with condition no. 3 attached to planning permission Ref. 2713/17. The proposed development also seeks to provide additional office floor space to both Blocks D & E, providing an increase of 2,931sq.m. of office accommodation to the overall previously permitted development. Block D will increase in height from permitted 2 & 4 storeys to proposed 3 & 5 storeys, while Block E will increase in height from permitted 4 storeys to proposed 5 storeys. Permission is also sought for an extension to the permitted basement car park, (i.e. 1,273sq.m.), to accommodate 52 no. additional car parking spaces, additional bicycle parking and a new emergency escape route to the surface. The proposed development also provides for conversion of 3 no. surface car parking spaces to 3 no. "GoCar" spaces to the north of Block B, and all associated site development works, on a site area of 1.55ha. The effect of the proposed development will be a modification to an extant permission under Ref. 2713/17.

Ref 4549/22: The proposed development will consist of modifications to the development permitted on site under DCC Reg. Ref.: 2713/17 and 2737/19. The proposal will include construction of an urban block comprising 3 no. 7 storey blocks (Blocks D, E, and F). - Block D, and the ground floors of Blocks E and F will provide c. 13,921 sqm office space (an increase of 2,454.7sqm). - Residential apartments are proposed on the upper floors of Blocks E and F providing 48 no. apartments (16 no. 1 beds, 24 no. 2 beds, and 8 no. 3 beds) to provide a new total of 253 no. residential units (in increase from 205 units). All residential units will have north/south/east/west facing private open spaces. The development will also include communal open space at podium level, 95 no. car parking spaces and 269 no. cycle parking spaces at surface and undercroft level (an increase of 15 no. car parking space and 164 no. cycle parking spaces), and all other site services and works to enable the development including bins, substations/plant areas, boundary treatments and landscaping.

Potential for In-combination Effects

The three applications are considered together as neither of the subsequent applications presents changes that have significance to ecology from the initial application. Thus, the Appropriate Assessment accompanying the initial application (Ref 2713/17) is used to consider the likelihood of in-combination effects with the Proposed Development.

This development shares a weak direct hydrological pathway with the Proposed Development via the Santry River and an indirect hydrological pathway via the Ringsend WwTP.

The associated Appropriate Assessment concluded that development 2713/17 would have negligible impacts on downstream European sites via surface water runoff to the Santry River for the following reasons: implementation of SuDS measures, intervening distance between the Site and European sites, and dilution capacity of the waterbody network. The combination of any negligible surface water inputs

to the Santry River from this development and the Proposed Development is not envisaged to cause likely significant impacts on any European sites, and therefore no in-combination effects are expected to arise. The potential for this development to act in combination with the Proposed Development to cause significant effects on European Sites in Dublin Bay via wastewater effluent from Ringsend WWTP is further considered in section 4.3.6.3 below.			
F20A/0004	Fingal County Council	Grant Permission (20/04/2021)	Lilmar Industrial Estate, Oak Avenue, Santry, Dublin 9. (Ca. 500m Northeast of Proposed Development)
Development Description Planning permission was sought for the demolition of existing industrial units (2417 sq.m). Construction of 2 no. apartment blocks (3-5 storeys in height), comprising 35 no. units (13 no. 1-bed, 18 no. 2-bed and 4 no. 3-bed), all with balconies/terraces facing north-south-east/west. Development to be accessed from Oak Avenue (existing) to the south with additional new pedestrian access to the east. Provision of car parking (surface) and cycle parking, open spaces and all associated site development works, landscaping, boundary treatments and other servicing works. **Potential for In-combination Effects** The initial application for this development states that no Environmental Impact Assessment was required and the development was granted planning permission by Fingal County Council and subsequently An Bord Pleanála. Based on the location and scale of the granted development it is deemed that this Development will not contribute to an in-combination effects with the Proposed Development.			

4.3.6.2 Relevant Policies and Plans

The local policies and plans detailed in section 2.2 above were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA where necessary to determine that no likely significant impacts will occur. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development. The Dublin County Development Plan 2022-2028 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

4.3.6.3 Operation of Ringsend WwTP

This section addresses in more detail the general issue of potential in-combination effects with Ringsend WwTP arising from the Operational Phase of the Proposed Development and other Developments, including future developments.

In summary, the impact of the Proposed Development and any future development has already been appropriately considered and assessed as part of the application process for the existing planning permissions pertaining to Ringsend WwTP.

The 2012 Ringsend WwTP application for planning permission (Ref. PL.29N.YA0010) was for a PE of 2.4 million and was predicated on the findings of the 2005 GDSDS. The GDSDS set out the drainage requirements for the Greater Dublin Area (GDA) up

to 2031. The GDSDS relied on the Regional Planning Guidelines (RPGs) and the National Spatial Strategy (NSS) in order to estimate the future projected population increases for the GDA. The studies indicated a predicted growth in population from 1.2 million in 2002 to just over 2 million in 2031 for the GDA region.

In June 2018 Irish Water applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WwTP facility. The first phase of upgrade works to Ringsend WwTP was completed in December 2021, which increased the capacity of the plant by 400,000 P.E. These works, together with the future works permitted will ultimately increase the capacity of the facility from 1.6 million P.E. to 2.4 million P.E. by 2025 (Irish Water website: https://www.water.ie/projects/local-projects/ringsend/)

Therefore, both the initially permitted 2012 upgrade and the permitted 2019 revised upgrade (Ref. ABP-301798-18) for Ringsend WWTP take account of population growth up to 2.4 million PE. Both applications were subject to EIA and therefore an EIAR and accompanied by an AA screening report and NIS.

Under the heading of "*Potential impact – Discharge of treated effluent, impacts on water quality, effects on qualifying interests*", the NIS (Irish Water, 2018b) for the Ringsend WwTP 2019 revised upgrade provides as follows:

> "*In the operational phase, the proposed upgrade of the Ringsend WwTP Component will result in an increase in the plant capacity and also an improvement in the final effluent quality. This will result in a reduction in the licensed parameters discharged into the receiving water, with significantly reduced quantities in respect of ammonia and phosphorous.*"[4]

This NIS goes on to state as follows:

> "*Overall, no significant adverse effects on are foreseen and indeed, a slight positive effect is possible. Effects of discharge during the operational phase of the project from the upgrade project will therefore have imperceptible impact on habitats listed within these European sites.*"[5]

In respect of this issue, the NIS concludes as follows:

> "*Thus, there is no potential for in-combination impacts of any other plan and project with the Ringsend WwTP Component of the proposed Upgrade Project.*"[6]

The EIAR for the ongoing upgrade at Ringsend WwTP (Irish Water, 2018a) also details the lack of any significant impacts to European sites observed as a result of the current stormwater overflow discharge levels at the WwTP. During storm events, once the capacities of the holding tanks are surpassed, the WwTP releases overflow via an outfall at Pigeon House Rd into the lower Liffey estuary.

[4] Section 4.5.1 at page 32

[5] Section 4.5.1 at page 33

[6] Section 4.5.1 at page 34

The EIAR carried out in relation to said upgrade concluded that in the 'do nothing' scenario, i.e., wherein the upgrade is not carried out; the current existing levels of nutrient input to Dublin Bay as a result of stormwater overflow from the WwTP, are not deemed to pose significant threats to the integrity of European sites located within or adjacent to Dublin Bay, or any of their Conservation Objectives regardless of said upgrade.

The EIAR report acknowledges that under the do-nothing scenario "*the areas in the Tolka Estuary and North Bull Island channel will continue to be affected by the cumulative nutrient loads from the river Liffey and Tolka and the effluent from the Ringsend WwTP*", which could result in a decline in biodiversity and the deterioration of the biological status of Dublin Bay (Irish Water, 2018a). Nevertheless, these negative impacts of nutrient over-enrichment are considered "unlikely". This is because historical data suggests that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna. The EIAR notes that "*although a localised decline could occur, it is not envisaged to be to a scale that could pose a threat to the shellfish, fish, bird or marine mammal populations that occur in the area."* Furthermore, the EIAR notes that significant impacts on waterbird populations foraging on invertebrates in Dublin Bay due to nutrient over-enrichment are "unlikely" to occur. What is important to note is that the do-nothing scenario predicts that nutrient and suspended solid loads from the WwTP will "*continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity"* and that *"if the status quo is maintained there will be little or no change in the majority of the intertidal faunal assemblages found in Dublin Bay which would likely continue to be relatively diverse and rich across the bay.*"

Therefore, it can be concluded that likely significant effects on marine biodiversity and the European sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely. Importantly, this conclusion is not dependent upon any future works to be undertaken at Ringsend. Thus, in the absence of any upgrading works, significant in-combination effects to European sites in this regard are not deemed likely to arise, and therefore likely significant effects involving foul waters produced by the Proposed Development also do not have the potential to occur.

TABLE 6. SUMMARY OF IMPACT ASSESSMENT ON EUROPEAN SITES AS A RESULT OF THE PROPOSED DEVELOPMENT.

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
North Dublin Bay SAC (000206)	No	No	No	No	No	None	**NO**
South Dublin Bay SAC (001266)	No	No	No	No	No	None	**NO**
SPA							
North Bull Island SPA (004006)	No	No	No	No	No	None	**NO**
North-west Irish Sea SPA (004236)	No	No	No	No	No	None	**NO**
South Dublin Bay and River Tolka Estuary SPA (004024)	No	No	No	No	No	None	**NO**

5 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed LRD at the junction of Santry Avenue and Swords Road, Santry, Dublin 9 has been assessed taking into account:

- The nature, size and location of the proposed works and possible impacts arising from the construction works.
- The QIs and conservation objectives of the European sites.
- The potential for in-combination effects arising from other plans and projects.

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that, on the basis of objective information; the possibility **may be excluded** that the Proposed Development will have a significant effect on the European sites listed below:

- North Dublin Bay SAC (000206)
- South Dublin Bay SAC (001266)
- North Bull Island SPA (004006)
- North-west Irish Sea SPA (004236)
- South Dublin Bay and River Tolka Estuary SPA (004024)

The screening exercise above used the best available scientific knowledge and objective information to assess potential impacts to European sites arising from the project itself or in combination with other plans and projects. Based on this assessment, and in light of these sites' conservation objectives, the possibility of any likely significant effects on the above listed European sites **may be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process and the preparation of an NIS is not required.

6 REFERENCES

DEHLG. (2010). Department of the Environment, Heritage and Local Government. Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. DEHLG, Dublin. (Rev. Feb 2010).

DHLGH. (2024). Department of Housing, Local Government and Heritage. Available at: https://housinggovie.maps.arcgis.com/home/index.html/. [Accessed February 2024].

Eco Advocacy CLG v An Bord Pleanála (2023) Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62021CJ0721 [Accessed February 2024]

EEA (2024). European Environmental Agency. Natura 2000 [Online Map] Viewer. Available at: https://natura2000.eea.europa.eu/ [Accessed February 2024]

EPA. (2024). Environmental Protection Agency Online Mapping [ONLINE] Available at: http://www.epa.ie/ [Accessed February 2024].

European Commission. (2000). *Communication from the Commission on the precautionary principle*. Commission of the European Communities, Brussels.

European Commission. (2001). Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Communities, Luxembourg.

European Commission. (2019). Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1555085968125&uri=CELEX:52019XC0125(07)

European Commission. (2021). Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC Brussels, 28.9.2021

Furness, R.W. (2019). Avoidance rates of herring gull, great black-backed gull and common gull for use in the assessment of terrestrial wind farms in Scotland. Scottish Natural Heritage Research Report No. 1019.

GSI. (2024a). Geological Survey of Ireland website [ONLINE] Available at: http://www.gsi.ie/ accessed [Accessed February 2024].

GSI. (2024b). Dublin GWB: Summary of Initial Characterisation. [ONLINE] Available at: https://gsi.geodata.gov.ie/downloads/Groundwater/Reports/GWB/CahorePointOCM.pdf [Accessed February 2024].

Jacobs. (2015). Greater Dublin Strategic Drainage Study. Available at: https://assets.gov.ie/81806/87cbf2d5-c8f4-48ab-9375-45ba37127496.pdf [Accessed February 2024]

Newton, S. (2017). Species Focus: Herring Gull. Bird Watch Ireland. Available at: https://birdwatchireland.ie/app/uploads/2019/03/Species-Focus-Herring-Gull.pdf [Accessed March 2024]

NPWS. (2010). Circular NPW 1/10 & PSSP 2/10. Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Department of Environment, Heritage and Local Government.

NPWS (2013a) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2013b) Site Synopsis: North Dublin Bay SAC 000206. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2013c) Conservation Objectives Supporting Document: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2013d) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2014a) Site Synopsis: North Bull Island SPA 004006. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2014b) Conservation Objectives Supporting Document: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2014c) Conservation Objectives Supporting Document: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2015a) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2015b) Site Synopsis: South Dublin Bay SAC 000210. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2015c) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2015d) Site Synopsis: South Dublin Bay and River Tolka Estuary SPA 004024. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2021) Conservation Objectives: Rye Water Valley/Carton SAC 001398. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

NPWS (2023a) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

NPWS (2023b) Site Synopsis: North-west Irish Sea SPA 004236. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Office of the Planning Regulator (2021). Appropriate Assessment Screening for Development Management, OPR Practice Note PN01

Scottish Natural Heritage (SNH). (2018) Avoidance Rates for the onshore SNH Wind Farm Collision Risk Model. September 2018 v2.

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