



# APPROPRIATE ASSESSMENT SCREENING REPORT

FOR

PROPOSED RESIDENTIAL  
DEVELOPMENT

AT

RAVENS ROCK ROAD,  
SANDYFORD, DUBLIN 18

ON BEHALF OF

Ravensbrook Ltd.

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# 1 INTRODUCTION

## 1.1 Background

Enviroguide Consulting was commissioned by Ravensbrook Ltd. to carry out an Appropriate Assessment Screening Report in respect of a Proposed Development at Ravens Rock Road, Sandyford, Dublin 18. This report contains information to enable the competent authority to undertake Stage 1 Appropriate Assessment screening in respect of the Proposed Development.

## 1.2 Legislative Background

Member States are required to designate Special Areas of Conservation (SACs) and Special Protected Areas (SPAs) under the EU Habitats and Birds Directives, respectively. SACs and SPAs are collectively known as Natura 2000 sites or 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 (without the application of mitigation measures to avoid or reduce significant effects to a European Site), in view of its conservation objectives.

If likely significant effects are identified or cannot be ruled out, an 'Appropriate Assessment' (AA) is required to determine whether the significant effects of the project, either alone or in combination with other plans and projects, would have an adverse effect on the integrity of the European sites, having regard to their conservation objectives and best scientific knowledge.

This AA Screening has been undertaken to determine the potential for significant effects on relevant European sites.

### 1.2.1 Legislative Context

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of SACs and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of SPAs. It is the responsibility of each Member State to designate SPAs and SACs, both of which will form part of Natura 2000, a network of protected sites throughout the European Community.

An Appropriate Assessment is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a Natura 2000 site, paragraphs 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.*”

These obligations in relation to Appropriate Assessment 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)...

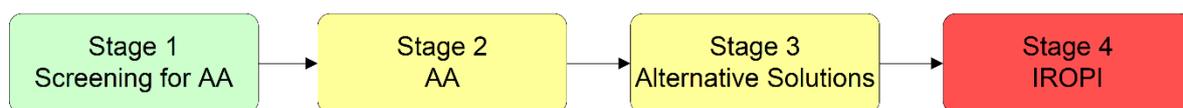
(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is required if it cannot be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination 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.”

### 1.2.2 Stages of AA

This Appropriate Assessment Screening Report (the “**Screening Report**”) has been prepared by Enviroguide Consulting. It considers whether the Proposed Development is likely to have a significant effect on a European site and whether a Stage 2 Appropriate Assessment is required.

The AA process is a four-stage process, with issues and tests at 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.



**FIGURE 1. THE FOUR STAGES OF THE APPROPRIATE ASSESSMENT PROCESS (DEHLG, 2010).**

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

- Stage 1 *Screening* addresses:
  - whether a plan or project is directly connected to or necessary for the management of the 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)*.** The second stage of the AA process assesses the impact of the project or plan (either alone or in combination with other projects or plans) on the integrity of the European site, having regard to the conservation objectives of the site and its ecological structure and function. A NIS must provide the objective scientific information to enable the competent authority to carry out an appropriate assessment of the proposed development. It should describe any mitigation measures to avoid and reduce significant negative impacts.
- **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 need to apply the precautionary principle in making any key decisions in relation to the tests of AA has been confirmed by European Court of Justice case law. Therefore, where significant effects are likely, uncertain, or unknown at screening stage, AA will be required.

If it is determined during screening stage that the proposal has the potential to have a significant effect on a European site, then a NIS will be required.

## 2 METHODOLOGY

### 2.1 Guidance

This AA 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;
- *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 (European Commission, 2021)*.
- *Communication from the Commission on the precautionary principle* (European Commission, 2000); and,
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019).
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021*

## 2.2 Screening Steps

This AA Screening Report has been undertaken in accordance with the European Communities Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2002) and the European Commission Guidance 'Assessment of plans and projects in relation to Natura 2000 sites' (EC, 2021). Screening for AA involves the following steps:

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

## 2.3 Desk Study

A desktop study was carried out 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, qualifying interests and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at [www.npws.ie](http://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](http://www.npws.ie);
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at [www.gis.epa.ie](http://www.gis.epa.ie);
- Information on bedrock, groundwater, aquifers and their status, obtained from Geological Survey Ireland (GSI) at [www.gsi.ie](http://www.gsi.ie);
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland;
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from Dublin Co. Council available at: <https://myplan.ie/>
- Hydrological & Hydrogeological Qualitative Risk Assessment for Proposed Development at 31 & 31A Ravensrock, Sandyford, Dublin 18, Co. Dublin (AWN Consulting, 2021)

For a complete list of the specific documents consulted as part of this assessment, see *Section 5 References*.

## **2.4 Assessment of Impacts**

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

- 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 STAGE 1 SCREENING**

### **3.1 Management of European Sites**

The Proposed Development at Ravens Rock Road, Sandyford, Co. Dublin is not directly connected with or necessary to the management of European sites.

### **3.2 Description of Proposed Development**

#### **3.2.1 Site location**

The Site of the Proposed Development is approximately 0.31ha, located within an industrial estate on Ravens Rock Road, Sandyford, Co. Dublin. The Site is located approximately 2.4km southeast of Dundrum Town Centre and almost 1.2km northeast of Sandyford Village. The Site currently contains industrial retail units, and is bounded on the north by Carmanhall Road, and on the east by Ravens Rock Road, and the southern and western boundaries are abutted by commercial buildings.

#### **3.2.2 Description of Development**

Ravensbrook Ltd, intend to apply to An Bord Pleanála for permission for a strategic housing development at this site of approximately 0.31ha on lands at IVM House, nos. 31 Ravens Rock Road (D18H304) and 31a Ravens Rock Road (D18C8P2), Sandyford Business Park, Dublin 18.

The development will consist of the demolition of the existing 2 no. storey building (c.717sqm) and hard surface parking area on the site and construction of a Build to Rent residential development comprising 101 no. residential apartments as follows:

- 101 no. build to rent apartments within a part 5, part 6 to part 11 no. storey building over partial basement comprising 65 no. 1 bedroom apartments and 36 no. 2 bedroom apartments (balconies on all elevations);
- 734sqm of external communal amenity space provided in the form of a podium courtyard at first floor level and a series of rooftop terraces at fifth, sixth and tenth floor levels, c. 514sqm of public open space provided fronting Carmanhall Road;
- 511 sqm of resident support facilities/ services and amenities space provided at ground and first floor levels;
- Vehicular access to the development will be from the upgraded existing access from Ravens Rock Road;
- Provision of 10 no. car parking spaces [1 no. accessible] at surface level, 2 no. motorcycle spaces; and 234 no. cycle parking spaces;
- Provision of 4 no. Ø0.3m Microwave link dishes to be mounted on 2 No. steel support pole affixed to lift shaft overrun, all enclosed in radio friendly GRP shrouds, together with associated equipment at roof level;
- Provision of an ESB substation, switch room and plant room at ground floor level, hard and soft landscaped areas, public lighting, attenuation, service connections and all ancillary site development works.

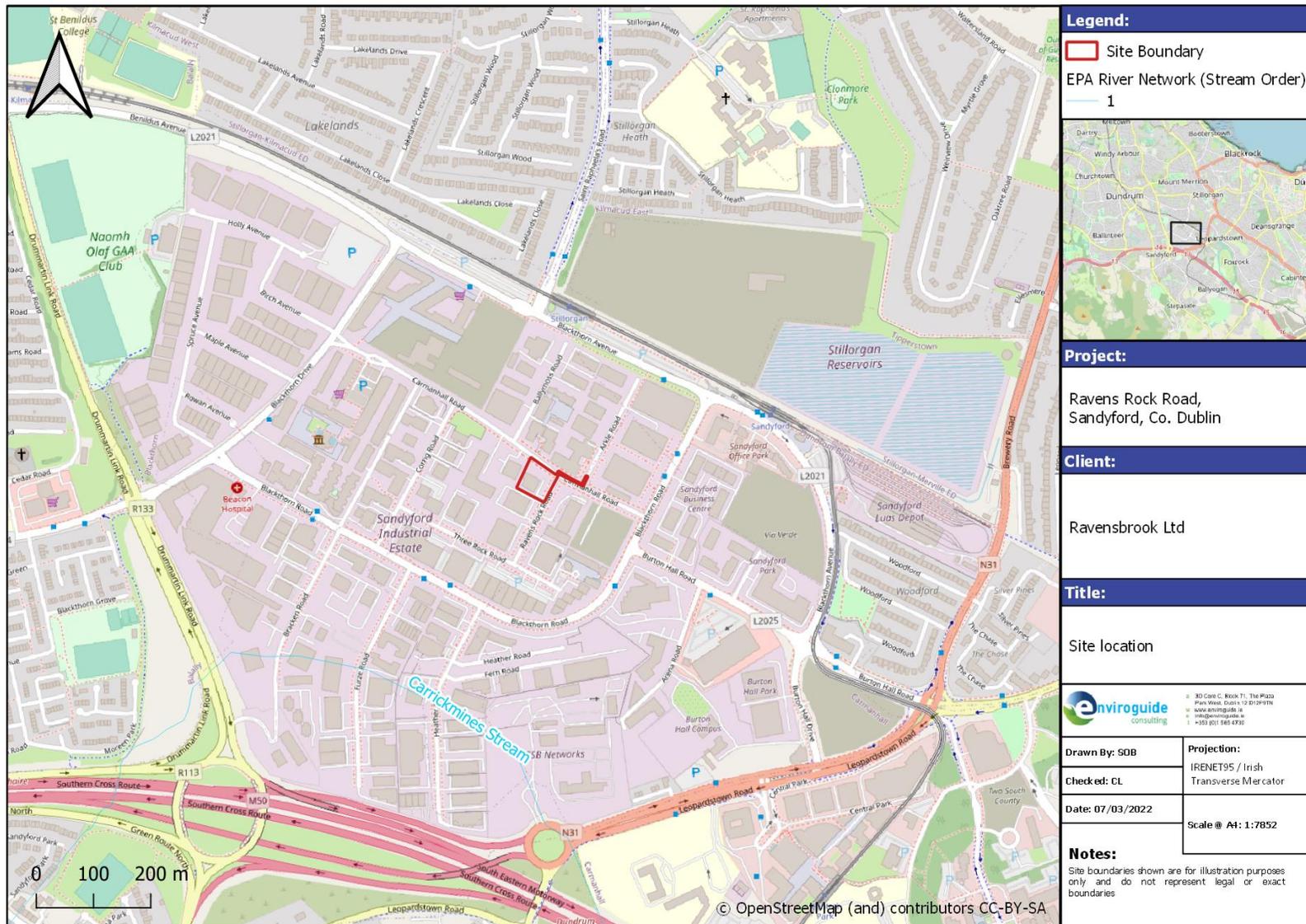


FIGURE 2. SITE LOCATION



### 3.3 Existing Environment

#### 3.3.1 Geology, Hydrology and Hydrogeology

The Site of the Proposed Development is within the Liffey and Dublin Bay catchment and Dodder\_SC\_010 sub catchment. The closest watercourse to the Site is the Carrickmines Stream approximately 400m to the southwest, however, according to the Hydrological & Hydrogeological Qualitative Risk Assessment (AWN Consulting, 2021) prepared as part of the Proposed Development, it is highly likely surface water from the Site discharges to the Brewery Stream, 980m northeast of the Site. The Brewery Stream then flows into Dublin Bay 3.7km northeast of the Site of the Proposed Development.

The Site is situated on the Kilcullen groundwater body, which is *At Risk* of not meeting its WFD objectives. The aquifer type within the Site boundary is a *Poor* (PI) aquifer on bedrock which is *Generally Unproductive except for Local Zones*. The groundwater rock units underlying the aquifer are classified as *Granites and other Igneous Intrusive rocks* (GSI, 2021). The level of vulnerability of the Site to groundwater contamination via human activities is *Moderate*. The soil is classified as *Urban* and the subsoil is made ground (*Made*) (EPA, 2021).

### 3.4 Identification of Relevant European Sites

In order to identify the European Sites that potentially lie within the Zone of Influence (ZOI) of the Proposed Development, a Source-Path-Receptor method (S-P-R) was adopted, as described in 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021), a practice note produced by the Office of the Planning Regulator, Dublin. This note was published to provide guidance on screening for appropriate assessment (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 Appropriate Assessment Screening Reports such as this.

The guidance document published by the Department of Housing, Planning and Local Government (then DEHLG) 'Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities' (2009) recommends an arbitrary distance of 15km as the precautionary ZOI for a plan or project being assessed for likely significant effects on European Sites, stating however that this should be evaluated on a case-by-case basis.

As such, the 15km ZOI is used in this report as an initial starting point for collating European sites for AA screening.

The methodology used to identify relevant European sites comprised the following:

- Use of up-to-date GIS spatial datasets for European designated sites and water catchments – downloaded from the NPWS website ([www.npws.ie](http://www.npws.ie)) and the EPA website ([www.epa.ie](http://www.epa.ie)) to identify European sites which could potentially be affected by the Proposed Development;
- The catchment data were used to establish or discount potential hydrological connectivity between the Project Boundary and any European sites. The hydrological catchments are shown in Figure 4.

- Where relevant, the presence of a substantial marine buffer was used to discount potential marine hydrological connectivity between the Project Boundary and any European sites.
- All European sites within 15km of the Development site were identified and are shown in Figure 4. In addition, the potential for connectivity with European sites at distances of greater than 15km from the Proposed Development was also considered in this initial assessment. In this case, there is no potential connectivity between the Proposed Development site and European sites located at a distance greater than 15km from the Proposed Development based on the S-P-R model.
- Table 1 provides details of all relevant European sites as identified in the preceding steps which are within the Zone of Influence (ZOI) of the Proposed Development.
- The site synopses and conservation objectives of these sites, as per the NPWS website ([www.npws.ie](http://www.npws.ie)), were consulted and reviewed at the time of preparing this report.
- No reliance is placed in this Appropriate Assessment Screening Report on measures intended to avoid/reduce harmful effects on the European sites.

The result of this preliminary screening concluded that there is a total of 10 SACs and 6 SPAs located within the ZOI of the Proposed Development Site. The distances to each site listed are taken from the nearest possible point of the Proposed Development Site boundary to the nearest possible point of each European site.

**TABLE 1. EUROPEAN SITES WITHIN THE ZONE OF INFLUENCE.**

| Site Name & Code                     | Qualifying Interests ( *= priority habitats) & Status <sup>1</sup>  | Distance to Site |
|--------------------------------------|---|------------------|
| <b>Special Areas of Conservation</b> |   |                  |
| South Dublin Bay SAC (000210)        | <b>Annex I Habitat:</b><br>[1140] Mudflats and sandflats not covered by seawater at low tide<br>[1210] Annual vegetation of drift lines<br>[1310] Salicornia and other annuals colonising mud and sand<br>[2110] Embryonic shifting dunes   | 3.6km            |
| Wicklow Mountains SAC (002122)       | <b>Annex I Habitat:</b><br>[3110] Oligotrophic waters containing very few minerals of sandy plains ( <i>Littorelletalia uniflorae</i> )<br>[3160] Natural dystrophic lakes and ponds<br>[4010] Northern Atlantic wet heaths with <i>Erica tetralix</i><br>[4030] European dry heaths<br>[4060] Alpine and Boreal heaths<br>[6130] Calaminarian grasslands of the <i>Violetalia calaminariae</i><br>[6230] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)<br>[7130] Blanket bogs (* if active bog) | 6.5km            |

<sup>1</sup> Status of qualifying interests of SACs are based on NPWS (2019) and status of qualifying interests of SPAs are based on Colhoun and Cummins (2013).

| Site Name & Code                        | Qualifying Interests ( *= priority habitats) & Status <sup>1</sup>  | Distance to Site |
|---|---|------------------|
|   | <p>[8110] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladanii</i>)</p> <p>[8210] Calcareous rocky slopes with chasmophytic vegetation</p> <p>[8220] Siliceous rocky slopes with chasmophytic vegetation</p> <p>[91A0] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p><b>Annex II Species:</b></p> <p>[1355] <i>Lutra lutra</i> (Otter)</p>   |                  |
| Knocksink Wood SAC (000725)             | <p><b>Annex I Habitat:</b></p> <p>[7220] Petrifying springs with tufa formation (Cratoneurion)</p> <p>[91A0] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p>[91E0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)</p>  | 7.2km            |
| Rockabill to Dalkey Island SAC (003000) | <p><b>Annex I Habitat:</b></p> <p>[1170] Reefs</p> <p><b>Annex II Species:</b></p> <p>[1351] <i>Phocoena phocoena</i> (Harbour Porpoise)</p>  | 8.0km            |
| Ballyman Glen SAC (000713)              | <p><b>Annex I Habitat:</b></p> <p>[7220] Petrifying springs with tufa formation (Cratoneurion)</p> <p>[7230] Alkaline fens</p>  | 8.2km            |
| North Dublin Bay SAC (000206)           | <p><b>Annex I Habitat:</b></p> <p>[1140] Mudflats and sandflats not covered by seawater at low tide</p> <p>[1210] Annual vegetation of drift lines</p> <p>[1310] Salicornia and other annuals colonising mud and sand</p> <p>[1330] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</p> <p>[1410] Mediterranean salt meadows (<i>Juncetalia maritimi</i>)</p> <p>[2110] Embryonic shifting dunes</p> <p>[2120] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes)</p> <p>[2130] Fixed coastal dunes with herbaceous vegetation (grey dunes)</p> <p>[2190] Humid dune slacks</p> <p><b>Annex II Species:</b></p> <p>[1395] <i>Petalophyllum ralfsii</i> (Petalwort)</p> | 8.6km            |
| Glenasmole SAC (001209)                 | <p><b>Annex I Habitat:</b></p> <p>[6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)</p> <p>[6410] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p> <p>[7220] Petrifying springs with tufa formation (Cratoneurion)</p>   | 10.4km           |
| Bray Head SAC (000714)                  | <p><b>Annex I Habitat:</b></p> <p>[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts</p> <p>[4030] European dry heaths</p>   | 12.0km           |
| Howth Head SAC (000202)                 | <p><b>Annex I Habitat:</b></p> <p>[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts</p> <p>[4030] European dry heaths</p>   | 12.7km           |

| Site Name & Code                                      | Qualifying Interests ( *= priority habitats) & Status <sup>1</sup>  | Distance to Site |
|---|---|------------------|
| Baldoye Bay SAC (000199)                              | <b>Annex I Habitat:</b><br>[1140] Mudflats and sandflats not covered by seawater at low tide<br>[1310] Salicornia and other annuals colonising mud and sand<br>[1330] Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritimae</i> )<br>[1410] Mediterranean salt meadows ( <i>Juncetalia maritimi</i> )  | 14.3km           |
| <b>Special Protection Areas</b>                       |   |                  |
| South Dublin Bay and River Tolka Estuary SPA (004024) | <b>Special Conservation Interest Species:</b><br>[A046] Light-bellied Brent Goose <i>Branta bernicla hrota</i><br>[A130] Oystercatcher <i>Haematopus ostralegus</i><br>[A137] Ringed Plover <i>Charadrius hiaticula</i><br>[A141] Grey Plover <i>Pluvialis squatarola</i><br>[A143] Knot <i>Calidris canutus</i><br>[A144] Sanderling <i>Calidris alba</i><br>[A149] Dunlin <i>Calidris alpina alpina</i><br>[A157] Bar-tailed Godwit <i>Limosa lapponica</i><br>[A162] Redshank <i>Tringa totanus</i><br>[A179] Black-headed Gull <i>Chroicocephalus ridibundus</i><br>[A192] Roseate Tern <i>Sterna dougallii</i><br>[A193] Common Tern <i>Sterna hirundo</i><br>[A194] Arctic Tern <i>Sterna paradisaea</i><br>[A999] Wetlands   | 3.6km            |
| Wicklow Mountains SPA (004040)                        | <b>Special Conservation Interest Species:</b><br>[A098] Merlin ( <i>Falco columbarius</i> )<br>[A103] Peregrine ( <i>Falco peregrinus</i> )   | 6.6km            |
| Dalkey Islands SPA (004172)                           | <b>Special Conservation Interest Species:</b><br>[A192] Roseate Tern ( <i>Sterna dougallii</i> )<br>[A193] Common Tern ( <i>Sterna hirundo</i> )<br>[A194] Arctic Tern ( <i>Sterna paradisaea</i> )   | 7.7km            |
| North Bull Island SPA (004006)                        | <b>Special Conservation Interest Species:</b><br>[A046] Brent Goose ( <i>Branta bernicla hrota</i> )<br>[A048] Shelduck ( <i>Tadorna tadorna</i> )<br>[A052] Teal ( <i>Anas crecca</i> )<br>[A054] Pintail ( <i>Anas acuta</i> )<br>[A056] Shoveler ( <i>Anas clypeata</i> )<br>[A130] Oystercatcher ( <i>Haematopus ostralegus</i> )<br>[A140] Golden Plover ( <i>Pluvialis apricaria</i> )<br>[A141] Grey Plover ( <i>Pluvialis squatarola</i> )<br>[A143] Knot ( <i>Calidris canutus</i> )<br>[A144] Sanderling ( <i>Calidris alba</i> )<br>[A149] Dunlin ( <i>Calidris alpina alpina</i> )<br>[A156] Black-tailed Godwit ( <i>Limosa limosa</i> )<br>[A157] Bar-tailed Godwit ( <i>Limosa lapponica</i> )<br>[A160] Curlew ( <i>Numenius arquata</i> )<br>[A162] Redshank ( <i>Tringa totanus</i> )<br>[A169] Turnstone ( <i>Arenaria interpres</i> )<br>[A179] Black-headed Gull ( <i>Chroicocephalus ridibundus</i> )<br>[A999] Wetlands and Waterbirds | 8.6km            |

| Site Name & Code              | Qualifying Interests ( *= priority habitats) & Status <sup>1</sup>  | Distance to Site |
|-------------------------------|---|------------------|
| Howth Head Coast SPA (004113) | <b>Special Conservation Interest Species:</b><br>[A188] Kittiwake ( <i>Rissa tridactyla</i> )   | 14.2km           |
| Baldoye Bay SPA (004016)      | <b>Special Conservation Interest Species:</b><br>[A046] Light-bellied Brent Goose <i>Branta bernicla hrota</i><br>[A048] Shelduck ( <i>Tadorna tadorna</i> )<br>[A137] Ringed Plover <i>Charadrius hiaticula</i><br>[A140] Golden Plover ( <i>Pluvialis apricaria</i> )<br>[A141] Grey Plover <i>Pluvialis squatarola</i><br>[A157] Bar-tailed Godwit ( <i>Limosa lapponica</i> )<br>[A999] Wetlands and Waterbirds | 14.3km           |

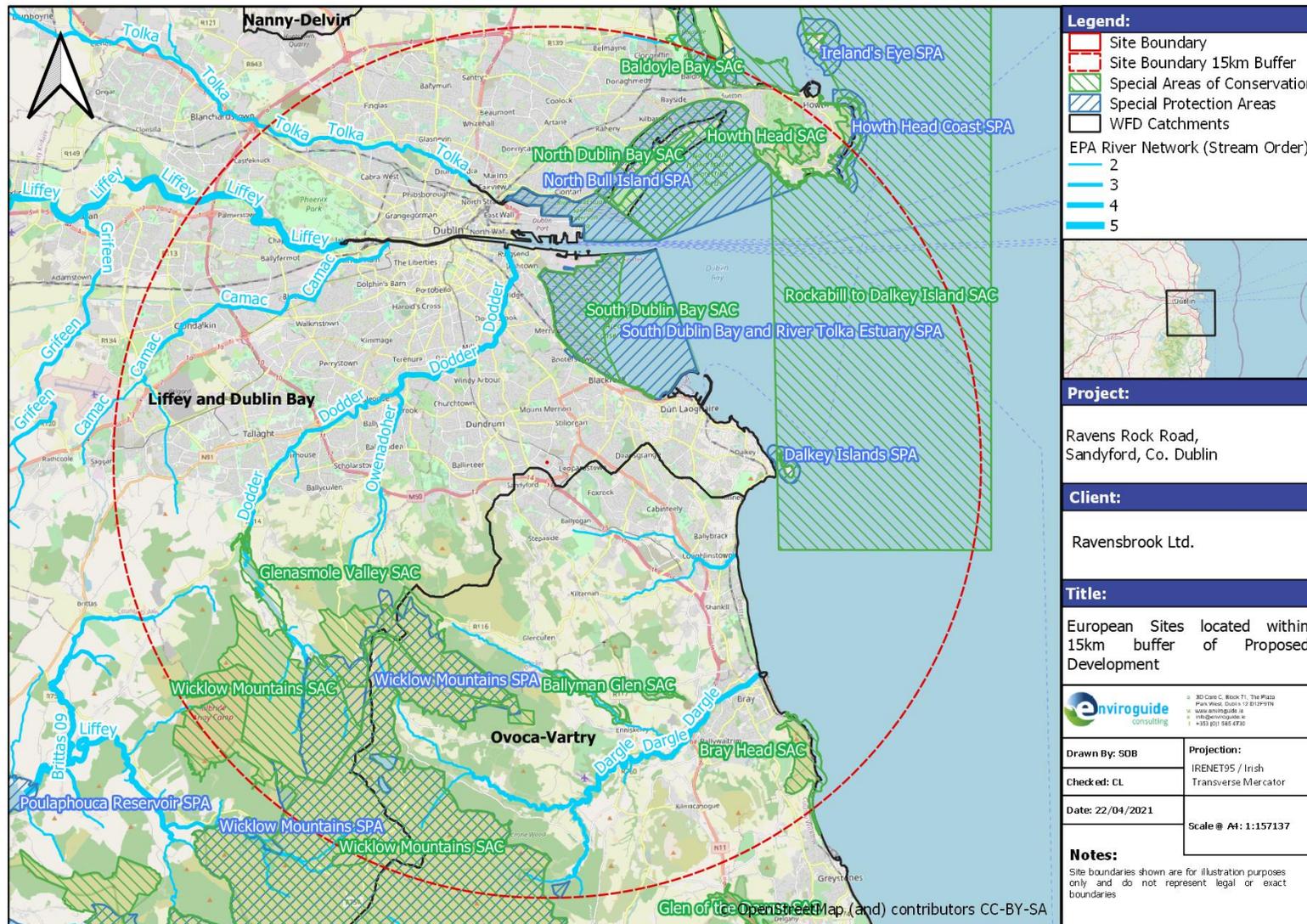


FIGURE 4. EUROPEAN SITES WITHIN A 15KM BUFFER OF PROPOSED DEVELOPMENT

### 3.5 Conservation objectives

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them.

Site specific conservation objectives (SSCO) have been compiled for South Dublin Bay SAC, Wicklow Mountains SAC, Ballyman Glen SAC, Rockabill to Dalkey Island SAC, North Dublin Bay SAC, Bray Head SAC, Howth Head SAC, Baldoyle Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, and Baldoyle Bay SPA. Site-specific conservation objectives aim to define favourable conservation condition for habitats or species at a site.

Generic conservation objectives have been compiled for Knocksink Wood SAC, Glenasmole Valley SAC, Wicklow Mountains SPA, Dalkey Islands SPA, and Howth Head Coast SPA. These are based on maintaining/restoring the favourable conservation condition of the habitats and species for which sites are selected.

The maintenance of habitats and species within European sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.

Favourable conservation status of a habitat is achieved when:

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

The favourable conservation status of a species is achieved when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long- term basis as a viable component of its natural habitats
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis

### 3.6 Identification and Assessment of Potential Impacts

The conservation objectives of the European sites within the zone of influence 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 qualifying interests and/or conservation objectives of the European sites within the zone of influence of the project.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e. "Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance".

### 3.7 Assessment of Potential Impacts

The potential for significant effects resulting from the Proposed Development during the Construction and Operational Phase was determined based on a range of indicators, including:

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

The following elements of the Proposed Development were assessed for their potential for likely significant effects on European sites.

- **Construction Phase** (*Estimated 12-18 months*)
  - 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**
  - Surface water drainage from the Site of the Proposed Development;
  - Increased lighting in the vicinity emitted from the Proposed Development; and
  - Increased human presence in the vicinity as a result of the Proposed Development.

#### 3.7.1 Habitat Loss and Alteration

The Proposed Development is not located within any European site and therefore there will be no loss or alteration of habitat as a result of the Proposed Development. Based on examination of aerial photography, the subject lands are composed of built lands and as such do not contain any habitats for which the European Sites within the zone of influence have been designated.

#### 3.7.2 Habitat / Species Fragmentation

Habitat fragmentation has been defined as the 'reduction and isolation of patches of natural environment' (Hall *et al.*, 1997 cited in Franklin *et al.*, 2002) usually due to an external disturbance such that an alteration of the spatial composition of a habitat occurs that alters the habitat and 'create[s] isolated or tenuously connected patches of the original habitat' (Wiens, 1989 cited in Franklin *et al.*, 2002). This results in spatial separation of habitat units which had previously been in a state of greater continuity.

As there will be no direct habitat loss within any European sites, no habitat fragmentation will arise as a result of the Proposed Development.

### **3.7.3 Changes in Water Quality and Resource**

#### **3.7.3.1 Construction Phase**

There is an indirect pathway between the Site and Dublin Bay via surface water discharge to Brewery Stream. There is an indirect hydrological connection to European sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) via discharges from the surface water sewer serving the Site during the Construction Phase of the Proposed Development. However, the potential for surface water generated at the Site of the Proposed Development to reach Dublin Bay and cause significant effects is negligible due to:

- The fact that the hydrological link will only exist during rainfall events;
- The distance between the Site and Dublin Bay, and consequent potential for dilution in the surface water network. Surface water discharges would have to travel over 4km before reaching the European Sites within Dublin Bay.

#### **3.7.3.2 Operational Phase**

The Proposed Development will be served by a separate foul sewer for ultimate treatment at Ringsend Wastewater Treatment Plant. There is an indirect pathway to European sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) through this foul sewer. The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay and cause significant effects is negligible due to:

- The upgrade works to Ringsend WWTP which will increase the capacity of the facility from 1.6 million PE to 2.4 million PE (see section 3.8.3 below for more details).
- The potential for dilution in the surface water network during heavy rainfall events.
- 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 3.8.3 below 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 Population Equivalent (PE) 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. This potential 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 this SAC. In addition, upgrade works are currently on-going at Ringsend WwTP to increase the capacity of the facility from 1.6 million PE to 2.4 million PE. This plant upgrade will result in an overall reduction in the final effluent discharge of several parameters from

the facility including BOD, suspended solids, ammonia, DIN and MRP (Irish Water, 2018).

The potential for surface water generated at the Site of the Proposed Development to reach European Sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) and cause significant adverse effects during the Operational Phase is negligible due to:

- The fact that the hydrological link will only exist during rainfall events;
- The distance between the Site and Dublin Bay, and consequent potential for dilution in the surface water network. Surface water discharges would have to travel over 4km before reaching the European Sites within Dublin Bay.

SuDS Measures included in the Project Design, however they are not being relied upon in any way to mitigate against likely significant effects on a European Site. It is a policy of Dublin City Council (SI18) to “require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works”. As such, the Proposed Development design will entail a suite of SuDS measures that will be incorporated into the Proposed Development.

### **3.7.3.3 Hydrological Risk Assessment**

A Hydrological and Hydrogeological Qualitative Risk Assessment was carried out by AWN Consulting (AWN Consulting, 2021) to assess the potential for any likely significant impacts on receiving waters within protected areas, during both the Construction and Operational phases of the Proposed Development. It is noted that this assessment was carried out in the absence of any consideration of any measures intended to avoid or reduce harmful effects potentially caused as a result of the Proposed Development (i.e., mitigation measures). According to this assessment, “*there are no pollutant linkages as a result of the construction or operation of the Proposed Development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay*”.

The risk assessment states:

*“There is no direct open-water pathway between the site and Dublin Bay. However, there is an indirect pathway through the stormwater drainage which would discharge into the Brewery Stream which outfalls into Dublin Bay c. 3.6 Km from the site; should any silt-laden stormwater from construction or hydrocarbon-contaminated water from a construction vehicle leak manage to enter the mentioned watercourse. The suspended solids will naturally settle within the drainage pipes and hydrocarbons will dilute to background levels (water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019 amendment) by the time the stormwater reaches any open water based on the distance to waterways.*

*During operation, the potential for sediment runoff is low based on the SUDs design measures. In addition, the potential for hydrocarbon discharge is quite minimal based on an individual vehicle (70 litres) leak being the only source for hydrocarbon release. However, even if the operation of the proposed SuDS, and interceptor systems are excluded from consideration, there is no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019) in the worst case scenarios described...*”

*“Even without treatment at the Ringsend WWTP, the peak effluent discharge, calculated for the Proposed Development as 3.12 litres/sec (which would equate to 0.028% of the licensed*

*discharge at Ringsend WWTP [peak hydraulic capacity]), would not have a measurable impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status (as defined within the Water Framework Directive)."*

### **3.7.4 Disturbance and / or Displacement of Species**

#### **3.7.4.1 Construction Phase**

The Proposed Development does not have the capacity to cause any significant disturbance and/or displacement to any species within any European site due to:

- The intervening distances between the Site of the Proposed Development and the European sites;
- The lack of any suitable *ex-situ* habitat for QI/SCI species within the Site of the Proposed Development. The Site is currently in use as built land and is not considered to have any significant *ex-situ* habitat for SCI species associated with any SPA.
- The Proposed Development entails the construction of an 11 storey structure, and as such, the risk of migrating birds colliding with the structures due to their height is deemed to be negligible as migrating species tend to commute far above this level with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020).
- The physical location of buildings and structures can also affect the likelihood of bird collisions. Structures placed on or near areas regularly used by large numbers of feeding, breeding, or roosting birds, or on local flight paths, such as those between foraging and roosting areas can present a higher risk of collision. The Site itself is not deemed to be located in a sensitive area in terms of bird flight paths i.e., it is not located adjacent to any Special Protected Areas (SPAs) designated for wetland bird populations and is in itself not deemed to represent suitable *ex-situ* feeding/roosting habitat for any such species, as the most dominant habitat on Site is built land.
- Herring Gull (*Larus argentatus*), which often nests on roofs of buildings in urban areas, is not listed as a SCI for any of the European Sites within the ZOI of the Proposed Development. This species is a SCI for Ireland's Eye SPA, located over 16.5km northeast of the Site. While the Site of the Proposed Development may offer potential nesting habitat for Herring Gull within the area, available nesting sites are available throughout the surrounding environment, and therefore the overall effect to this species is negligible. XX XX
- The lack of any faunal species associated with North Dublin Bay SAC and South Dublin Bay SAC.

The subject lands do not contain records of any species for which the European Sites within the zone of influence have been designated.

#### **3.7.4.2 Operational Phase**

For reasons outlined above in section 3.7.3.2 and 3.7.4.1, there are no predicted significant disturbance/displacement impacts to any species associated with any European Site during the Operational Phase of the Proposed Development.

### 3.7.5 Changes in Population Density

#### 3.7.5.1 Construction Phase

There is no potential for negative impacts on SCI species associated with the SPAs within the zone of influence of the Proposed Development due to:

- the intervening distances between the Site of the Proposed Development and the nearest European sites; and
- the lack of any suitable and/or significant *ex-situ* habitat for QI/SCI species within, or within close proximity, to the Site of the Proposed Development.

#### 3.7.5.2 Operational Phase

For reasons outlined in section 3.7.3.2 and 3.7.5.1, there are no predicted significant changes to the population density of any species associated with any European Site during the Operational Phase of the Proposed Development.

### 3.8 Potential for In-combination Effects

#### 3.8.1 Existing Granted Planning Permissions

There are several existing planning permissions on record in the area ranging from small scale extensions and alterations to existing residential properties to some larger-scale developments. The larger-scale developments identified within the vicinity of the Proposed Development within the last three years are as follows:

**Planning Application Reference: ABP30440519.**

Permission for a strategic housing development with an application site area of c. 2.02 ha (excluding basements), including the extent of Carmanhall Road required for proposed flood mitigation works, on lands forming part of a development generally known as Rockbrook, located at the junction of Blackthorn Drive and Carmanhall Road, Sandyford Business District, Sandyford, Dublin 18, principally bounded by existing mixed use and residential development to the north (Grande Central and South Central); Carmanhall Road to the south; undeveloped lands to the east (known as the Tivway site) and an existing part-constructed office development to the west (The Sentinel). The development, which is known as RB Central with a total gross floor area of c. 41,347 sq m (excluding basements) will consist of 428 no. apartments comprising two blocks arranged around two courtyards ranging in height from five to fourteen storeys (including ground floor mezzanine, all over three existing part-constructed basement levels) comprising 32 no. studio apartments; 122 no. 1 bedroom apartments; 251 no. 2 bedroom apartments and 23 no. 3 bedroom apartments. The development will also include a crèche (486 sq m) with ancillary outdoor play areas; 4 no. ground floor local/neighbourhood retail units (862 sq m); communal community residents' facilities (934 sq m in total) including a multi-purpose space (184 sq m), laundry and community co-working area (97 sq m) at ground floor level, and residents' exercise area, break-out/meeting areas, book and media sharing areas, reading/seating areas, play area and TV/games area located at various levels throughout the proposed development (653 sq m); entrance halls; private, communal and public open space provision including balconies, winter gardens and terraces to be provided on all elevations at all levels as required; roof gardens; courtyards; boulevards; urban plaza; amenity lawn and play areas; basement car parking (508 no. spaces in total); 3 no. surface crèche drop-off parking spaces; car club spaces; 593 no. cycle parking spaces

(long and short stay spaces including secure stands); motorcycle parking; storage areas; internal roads and pathways; pedestrian access points; hard and soft landscaping, street furniture and boundary treatments; changes in level; services provision and related pipework including diversions; plant (including rooftop plant); electric vehicle charging points; ESB substations and switchrooms; waste management areas; green roofs; attenuation tank; flood mitigation measures to Carmanhall Road including footpath upgrade and flood wall; car park ventilation areas; set-down areas; signage; completion and re-configuration of the existing basement levels including related site clearance works and removal of services; public lighting and all site development and excavation works above and below ground. Vehicular access to the site will be from Blackthorn Drive and Carmanhall Road with dedicated bicycle access from Blackthorn Drive. **(Decision: Grant Permission. Decision Date: 19/08/2019).**

#### **Planning Application Reference: ABP30594019.**

Permission for a strategic housing development, which will have a Gross Floor Area of 49,342 sqm m will principally consist of: the demolition of the existing structures on site and the provision of a Build-to-Rent residential development comprising 564 No. apartments (46 No. studio apartments, 205 No. one bed apartments, 295 No. two bed apartments and 18 No. three bed apartments) in 6 No. blocks as follows: Block A (144 No. apartments) is part 10 to part 11 No. storeys over basement; Block B (68 No. apartments) is 8 No. storeys over basement; Block C (33 No. apartments) is 5 No. storeys over lower ground; Block D (103 No. apartments) is part 16 to part 17 No. storeys over lower ground; Block E (48 No. apartments) is 10 No. storeys over semi-basement; and Block F (168 No. apartments) is 14 No. storeys over semi basement. The development provides resident amenity spaces (1,095 sqm) in Blocks A, C and D including concierge, gymnasium, lounges, games room and a panoramic function room at Roof Level of Block D; a creche (354 sqm); café (141 sqm); a pedestrian thoroughfare from Carmanhall Road to Blackthorn Drive also connecting into the boulevard at Rockbrook to the west; principal vehicular access off Carmanhall Road with servicing and bicycle access also provided off Blackthorn Drive; 285 No. car parking spaces (254 No. at basement level and 31 No. at ground level); 21 No. motorcycle spaces; set-down areas; bicycle parking; bin storage; boundary treatments; hard and soft landscaping; lighting; plant; ESB substations and switchrooms; sedum roofs; and all other associated site works above and below ground. The application contains a statement setting out how the proposal will be consistent with the objectives of the Dún Laoghaire - Rathdown County Development Plan 2016-2022. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land. An Environmental Impact Assessment Report has been prepared in respect of the proposed development. The application together with an Environmental Impact Assessment Report may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dún Laoghaire - Rathdown County Council. **(Decision: Grant Permission. Decision Date: 12/03/2020).**

#### **Planning Application Reference: D19A/0946**

Permission for demolition of existing two storey over basement commercial building of 1507m<sup>2</sup> and construction of a new six storey plus roof plant over basement commercial office building

with ancillary café and retail use at ground floor; overall new building area proposed is 5982.51m<sup>2</sup> and basement of 1370.50m<sup>2</sup> (total is 7353.01m<sup>2</sup>) with 29 car spaces; New civic plaza accessible to public at junction of Corrig Road and Carmanhall Road, all ancillary landscaping services and bicycle parking at plaza and within building, and all ancillary civil engineering and drainage connections on a site of 0.2ha. **(Decision: Grant Permission. Decision Date: 31/08/2020).**

#### **Planning Application Reference: D18A/1080**

Permission for the construction of two no. single storey pavilion buildings to the west and east of the existing single storey retail and café building. Pavilion building 1 is for Class 1 Shop use (GFA of c.140 sqm) and Pavilion building 2 is for café/restaurant use (GFA of c.140 sqm). The proposal includes 2 no. signage zones for each unit, associated outdoor seating/terrace area, cycle parking and all associated site works. **(Decision: Grant Permission. Decision Date: 20/02/2019).**

#### **Planning Application Reference: ABP30346719**

Application to An Bord Pleanála for permission for a strategic housing development, consisting of: (i) construction of a student accommodation development with an overall gross floor area of 25,459sqm in 1 no. seven to nine no. storey block. The development will include: 17 no. two-bed units; 1 no. three-bed units; 8 no. four-bed units; 42 no. five-bed units; 21 no. six-bed units; 35 no. seven-bed units; and 7 no. eight-bed units, providing a total of 817 no. bedspaces. Ancillary student support facilities are also proposed, including: an entrance/reception (101sqm); management office (55sqm); and gym (297sqm) located at ground floor level, and 21 no. communal spaces (internal), including movie room, study and hang-out spaces (comprising a total of 842sqm) across all levels of the building; (ii) The provision of 2 no. commercial units fronting Blackthorn Road - a café/lounge (119sqm) and a laundrette (85sqm) at ground floor level fronting Blackthorn Road; (iii) The provision of 57 no. car-parking spaces (3 no. of which are disabled car-parking spaces), 586 no. bicycle parking spaces (560 no. provided within the ground floor parking area and 26 no. provided along the Carmanhall Road and Blackthorn Road frontages), 5 no. motorcycle parking spaces; bin stores, plant rooms, switch room and ESB sub-station at ground floor level; alterations to the existing vehicular entrance from Carmanhall Road; creation of a new vehicular entrance from the Blackthorn Road which will serve as an entrance for bin collection and emergency services only; and creation of a new cycle path along the Carmanhall Road and Blackthorn Road frontages; (vi) All ancillary works, including landscaped areas, comprising an internal courtyard and public open space along the Carmanhall Road and Blackthorn Road frontages; boundary treatments, all ancillary drainage works, including SuDS drainage, lighting; public footpath works; and all other associated site services, site infrastructure and site development works. The application contains a statement setting out how the proposal will be consistent with the objectives of the Dun Laoghaire- Rathdown Development Plan 2016-2022. **(Decision: Grant Permission. Decision Date: 30/04/2019).**

#### **Planning Application Reference: D18A/0785**

Permission for development. The proposed development will substantially complete the Beacon South Quarter scheme and will be constructed over 3 no. existing basement levels which extend beneath the subject site as permitted under Dun Laoghaire-Rathdown County Council Planning Reg. Ref. D04A/0618 as amended. The proposed development comprises

a mixed-use scheme (c. 13,076 m<sup>2</sup>) ranging in height from 1 – 14 storeys, including a ground floor mezzanine level, arranged around a communal area of open space of c. 1,014 m<sup>2</sup>. The proposed development will include; 3 no. neighbourhood retail units at ground floor level (c. 781 m<sup>2</sup>, c.559 m<sup>2</sup> and c.181 m<sup>2</sup> respectively), plant and refuse store rooms; a two-storey crèche unit at the ground and mezzanine floor levels (c. 390 m<sup>2</sup>); and 84 no. apartment units arranged across the 1st to 13th floors (12 no. 1-bedroom units, 59 no. 2-bedroom units and 13 no. 3-bedroom units) with balconies, terraces or winter gardens provided to all elevations. The proposed development will include the provision of 65 no. car parking spaces in lieu of the previously permitted storage use at the existing basement level -3; 5 no. motorcycle spaces in the permitted, existing basement level -2; and, 136 no. bicycle parking spaces and 3 no. dedicated crèche car parking spaces in the permitted existing basement level -1. A new lift access is proposed in basement level -1 to serve the proposed apartment units. Vehicular access to the basement levels will be from the existing ramp to the east of the site via Blackthorn road, with pedestrian access to the proposed development provided from Blackthorn Drive and Blackthorn Road. The development will also include piped infrastructure and ducting; green roofs; 84 no. solar panels and plant at roof level; site landscaping; on-street cycle parking facilities; boundary treatments; and, all associated site development and excavation works above and below ground. The development will also include minor hard and soft landscaping works to the public footpaths adjoining the site at Blackthorn Drive and Blackthorn Road. **(Decision: Grant Permission. Decision Date: 25/01/2019).**

#### **Planning Application Reference: D20A/0921**

Permission is sought to vary the previously approved development Reg. Ref. D15A/0560. The proposed changes to the previously approved are: (a) building height increased by one floor on all five Blocks, A to E, resulting in an increase of floor area from 41,871 sq. m to 54,730 sq. m (b) minor realignment of basement boundary at the south west and south east corners of the site (c) minor realignment of all blocks (d) revised facade treatment on all blocks (e) modifications to hard and soft landscaping at ground floor level and to increase the size and number of landscaped terrace areas at upper floors. (f) internal reconfiguration to building core layouts to comply with Building Regulations and Industry Standards and (g) provision of totem identification sign. All other works approved shall be carried out in accordance with the plans and particulars lodged with the parent application, Reg. Ref. D15A/0560, subject to the conditions attached. (Final Grant Order: P/2275/16). The application is accompanied by an Environmental Impact Assessment Report updated from that lodged with the 2015 parent application. **(Decision: Pending. Decision Date: 08/02/2021).**

#### **Planning Application Reference: D20A/0526**

Permission for development to comprise the construction of a new two storey storage / workshop building to the side of the existing part two storey, part single storey (double height) warehouse building along with the formation of a new site entrance from Spruce Avenue, all with associated site works and landscaping. **(Decision: Grant Permission. Decision Date: 12/11/2020).**

At the time of writing, there are no proposed or permitted forestry operations (thinning, clear felling, road construction) in close proximity to the Site of the Proposed Development<sup>2</sup>.

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<sup>2</sup> <https://forestry-maps.apps.rhos.agriculture.gov.ie/>

Given the distance between abovementioned permitted developments/forestry Operations and the European Sites within the zone of influence, it is concluded that there is no potential for in-combination effects to arise as a result of the Proposed Development.

### 3.8.2 Relevant Policies and Plans

The following policies and plans were reviewed and considered for possible in-combination effects with the Proposed Development.

- Dublin City Development Plan 2016 – 2022
- Dún Laoghaire - Rathdown County Council County Development Plan 2016 – 2022
- South Dublin County Council Development Plan 2016 – 2022
- Dublin City Biodiversity Action Plan 2015 – 2020
- Dún Laoghaire - Rathdown County Biodiversity Action Plan 2021 – 2025 Draft Summary Consultation Document
- Connecting with Nature – Draft Biodiversity Action Plan for South Dublin County 2020 – 2026

Dublin City Biodiversity Action Plan 2015-2020, Dún Laoghaire – Rathdown County Biodiversity Action Plan 2021 – 2025 Draft, and the Connecting with Nature – Draft Biodiversity Action Plan for South Dublin County 2020 – 2026 are all set out to protect and improve biodiversity, and as such will not result in negative in-combination effects with the Proposed Development. The Dublin City Development Plan 2016-2022 has directly addressed the protection of European Sites through specific policies (GI2), as has the Dún Laoghaire-Rathdown County Council County Development Plan 2016 – 2022 (LHB 1; LHB 12; LHB 20; LHB 22; LHB 24) and the South Dublin County Council Development Plan 2016 – 2022 (HCL12 Obj1-Obj2, HCL13 Obj1-Obj2).

On examination of the above it is considered that there are no means for the Proposed Development to act in-combination with any plans or projects, that would cause any likely significant effects on any European sites.

### 3.8.3 Operation of Ringsend WwTP

In June 2018 Irish Water applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WwTP facility. There are already on-going upgrade works taking place, which were the subject of a prior permission which are expected to be complete in 2021. These works, together with the further works permitted in 2019 will increase the capacity of the facility from 1.6 million PE to 2.4 million PE. This plant upgrade will result in an overall reduction in the final effluent discharge of several parameters from the facility including BOD, suspended solids, ammonia, DIN and MRP. An Environmental Impact Assessment Report (EIAR) was submitted by Irish Water as part of this application. The EIAR contains sections relating to Marine Biodiversity and Terrestrial Biodiversity, and each contains a section on the 'do-nothing scenario'. These review the effects of the WwTP on biodiversity in Dublin Bay *in the absence of the upgrade works* and so are relevant to this report.

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, 2018). Nevertheless, these negative impacts of nutrient over-enrichment are

considered “*unlikely*” (Irish Water, 2018). 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 (Irish Water, 2018). What is important in the context of this AA screening report 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 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.

**TABLE 2. SUMMARY OF POTENTIAL IMPACTS ON RELEVANT EUROPEAN SITES**

| European site                              | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|--|----------------------------------|--|-----------------------------|
| <b>Special Areas of Conservation (SAC)</b> |                                  |  |                             |
| South Dublin Bay SAC (000210)              | 3.6km                            | <p><b>No potential impacts on the SAC envisaged due to:<br/>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>• The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>• There is an indirect hydrological connection to European sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) via discharges to the Brewery Stream during the Construction and Operational Phases of the Proposed Development. However, the potential for surface water generated at the Site of the Proposed Development to reach Dublin Bay and cause significant effects is negligible due to: <ul style="list-style-type: none"> <li>- The fact that the hydrological link will only exist during rainfall events;</li> <li>- The distance between the Site and Dublin Bay, and consequent potential for dilution in the surface water network. Surface water discharges would have to travel over 4km before reaching the European Sites within Dublin Bay.</li> </ul> </li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b><br/>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>• On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>• Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>• No significant in-combination effects with the current operation of Ringsend WwTP are anticipated (refer to section 3.8.3 for details).</li> </ul> | <b>NO</b>                   |

| European site                  | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|--------------------------------|----------------------------------|--|-----------------------------|
|                                |                                  | <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p>  |                             |
| Wicklow Mountains SAC (002122) | 6.5km                            | <p><b>No potential impacts on the SAC envisaged due to:</b><br/><b>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a hydrological connection or alternative pathway between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>There is no hydrological connection between the Site of the Proposed Development and the SAC site, therefore, there is no risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction/Operation Phases of the Proposed Development contaminating this SAC.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> | NO                          |
| Knocksink Wood SAC (000725)    | 7.2km                            | <p><b>No potential impacts on the SAC envisaged due to:</b><br/><b>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul>  | NO                          |

| European site                           | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|---|----------------------------------|---|-----------------------------|
|   |                                  | <p><b>The absence of a hydrological connection or alternative pathway between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>There is no hydrological connection between the Site of the Proposed Development and the SAC site, therefore, there is no risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction/Operation Phases of the Proposed Development contaminating this SAC.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p>   |                             |
| Rockabill to Dalkey Island SAC (003000) | 8.0km                            | <p><b>No potential impacts on the SAC envisaged due to:</b><br/><b>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The distance between the Site and the SAC and the consequent dilution factor eliminates the risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction of the Proposed Development contaminating this SAC.</li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b><br/>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> </ul> | NO                          |

| European site                 | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|-------------------------------|----------------------------------|---|-----------------------------|
|                               |                                  | <ul style="list-style-type: none"> <li>No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p>  |                             |
| Ballyman Glen SAC (000713)    | 8.2km                            | <p><b>No potential impacts on the SAC envisaged due to:<br/>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a hydrological connection or alternative pathway between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>There is no hydrological connection between the Site of the Proposed Development and the SAC site, therefore, there is no risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction/Operation Phases of the Proposed Development contaminating this SAC.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> | NO                          |
| North Dublin Bay SAC (000206) | 8.6km                            | <p><b>No potential impacts on the SAC envisaged due to:<br/>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated</li> </ul>   | NO                          |

| European site | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|---------------|----------------------------------|---|-----------------------------|
|               |                                  | <p>emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</p> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>• There is an indirect hydrological connection to European sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) via discharges to the Brewery Stream during the Construction and Operational Phases of the Proposed Development. However, the potential for surface water generated at the Site of the Proposed Development to reach Dublin Bay and cause significant effects is negligible due to: <ul style="list-style-type: none"> <li>- The fact that the hydrological link will only exist during rainfall events;</li> <li>- The distance between the Site and Dublin Bay, and consequent potential for dilution in the surface water network. Surface water discharges would have to travel over 4km before reaching the European Sites within Dublin Bay.</li> </ul> </li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b></p> <p>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>• On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>• Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>• No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> |                             |

| European site           | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|-------------------------|----------------------------------|--|-----------------------------|
| Glenasmole SAC (001209) | 10.4km                           | <p><b>No potential impacts on the SAC envisaged due to:</b><br/> <b>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a hydrological connection or alternative pathway between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>There is no hydrological connection between the Site of the Proposed Development and the SAC site, therefore, there is no risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction/Operation Phases of the Proposed Development contaminating this SAC.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> | NO                          |
| Bray Head SAC (000714)  | 12.0km                           | <p><b>No potential impacts on the SAC envisaged due to:</b><br/> <b>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a hydrological connection or alternative pathway between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>There is no hydrological connection between the Site of the Proposed Development and the SAC site, therefore, there is no risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction/Operation Phases of the Proposed Development contaminating this SAC.</li> </ul>   | NO                          |

| European site            | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|--------------------------|----------------------------------|---|-----------------------------|
| Howth Head SAC (000202)  | 12.7km                           | <p><b>No potential impacts on the SAC envisaged due to:</b><br/> <b>The intervening distance between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>The distance between the Site and the SAC and the consequent dilution factor eliminates the risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction of the Proposed Development contaminating this SAC.</li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b><br/> The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> | NO                          |
| Baldoye Bay SAC (000199) | 14.3km                           | <p><b>No potential impacts on the SAC envisaged due to:</b><br/> <b>The intervening distance between the Proposed Development and the SAC.</b></p>  | NO                          |

| European site   | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|---|----------------------------------|---|-----------------------------|
|   |                                  | <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SAC arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a hydrological connection or alternative pathway between the Proposed Development and the SAC.</b></p> <ul style="list-style-type: none"> <li>There is no hydrological connection between the Site of the Proposed Development and the SAC site, therefore, there is no risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction/Operation Phases of the Proposed Development contaminating this SAC.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> |                             |
| <b>Special Protected Areas (SPA)</b>                  |                                  |   |                             |
| South Dublin Bay and River Tolka Estuary SPA (004024) | 3.6km                            | <p><b>No potential impacts on the SPA envisaged due to:</b><br/><b>The intervening distance between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>There is an indirect hydrological connection to European sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) via discharges to the Brewery Stream during the Construction and Operational Phases of the Proposed Development. However, the</li> </ul>  | <b>NO</b>                   |

| European site                  | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|--------------------------------|----------------------------------|---|-----------------------------|
|                                |                                  | <p>potential for surface water generated at the Site of the Proposed Development to reach Dublin Bay and cause significant effects is negligible due to:</p> <ul style="list-style-type: none"> <li>- The fact that the hydrological link will only exist during rainfall events;</li> <li>- The distance between the Site and Dublin Bay, and consequent potential for dilution in the surface water network. Surface water discharges would have to travel over 4km before reaching the European Sites within Dublin Bay.</li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b><br/>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>• On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>• Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>• No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> <p><b>The lack of suitable habitat for qualifying interests of the SPA within, or within close proximity, to the Proposed Development.</b></p> <ul style="list-style-type: none"> <li>• The Site of the Proposed Development is not considered to be suitable and/or significant ex-situ breeding, roosting, staging or foraging habitats for the species listed as qualifying interests for the SPA.</li> </ul> |                             |
| Wicklow Mountains SPA (004040) | 6.6km                            | <p><b>No potential impacts on the SPA envisaged due to:</b><br/><b>The intervening distance between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>• The intervening distance is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and</li> </ul>  | <b>NO</b>                   |

| European site               | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|-----------------------------|----------------------------------|--|-----------------------------|
|                             |                                  | <p>associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</p> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The distance between the Site and the SPA and the consequent dilution factor eliminates the risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction of the Proposed Development contaminating the SPA.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> <p><b>The lack of suitable habitat for qualifying interests of the SPA within, or within close proximity, to the Proposed Development.</b></p> <ul style="list-style-type: none"> <li>The Site of the Proposed Development is not considered to be suitable and/or significant ex-situ breeding, roosting, staging or foraging habitats for the species listed as qualifying interests for the SPA.</li> </ul> |                             |
| Dalkey Islands SPA (004172) | 7.7km                            | <p><b>No potential impacts on the SPA envisaged due to:</b></p> <p><b>The intervening distance between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SPA.</b></p>   | NO                          |

| European site                  | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|--------------------------------|----------------------------------|--|-----------------------------|
|                                |                                  | <ul style="list-style-type: none"> <li>The distance between the Site and the SPA and the consequent dilution factor eliminates the risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction of the Proposed Development contaminating the SPA.</li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b><br/>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> <p><b>The lack of suitable habitat for qualifying interests of the SPA within, or within close proximity, to the Proposed Development.</b></p> <ul style="list-style-type: none"> <li>The Site of the Proposed Development is not considered to be suitable and/or significant ex-situ breeding, roosting, staging or foraging habitats for the species listed as qualifying interests for the SPA.</li> </ul> |                             |
| North Bull Island SPA (004006) | 8.6km                            | <p><b>No potential impacts on the SPA envisaged due to:<br/>The intervening distance between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul>  | NO                          |

| European site | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|---------------|----------------------------------|--|-----------------------------|
|               |                                  | <p><b>The absence of a significant hydrological connection between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>• There is an indirect hydrological connection to European sites in Dublin Bay (North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) via discharges to the Brewery Stream during the Construction and Operational Phases of the Proposed Development. However, the potential for surface water generated at the Site of the Proposed Development to reach Dublin Bay and cause significant effects is negligible due to: <ul style="list-style-type: none"> <li>- The fact that the hydrological link will only exist during rainfall events;</li> </ul> </li> </ul> <p>The distance between the Site and Dublin Bay, and consequent potential for dilution in the surface water network. Surface water discharges would have to travel over 4km before reaching the European Sites within Dublin Bay</p> <p><b>The current and future operation of Ringsend WwTP.</b></p> <p>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>• On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>• Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>• No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> <p><b>The lack of suitable habitat for qualifying interests of the SPA within, or within close proximity, to the Proposed Development.</b></p> <p>The Site of the Proposed Development is not considered to be suitable and/or significant ex-situ breeding, roosting, staging or foraging habitats for the species listed as qualifying interests for the SPA.</p> |                             |

| European site                 | Distance to Proposed Development | Summary of potential for significant impacts on European site  | Further Assessment Required |
|-------------------------------|----------------------------------|--|-----------------------------|
| Howth Head Coast SPA (004113) | 14.2km                           | <p><b>No potential impacts on the SPA envisaged due to:</b></p> <p><b>The intervening distance between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The distance between the Site and the SPA and the consequent dilution factor eliminates the risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction of the Proposed Development contaminating the SPA.</li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b></p> <p>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> <p><b>The lack of suitable habitat for qualifying interests of the SPA within, or within close proximity, to the Proposed Development.</b></p> | NO                          |

| European site            | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|--------------------------|----------------------------------|---|-----------------------------|
|                          |                                  | The Site of the Proposed Development is not considered to be suitable and/or significant ex-situ breeding, roosting, staging or foraging habitats for the species listed as qualifying interests for the SPA.   |                             |
| Baldoye Bay SPA (004016) | 14.3km                           | <p><b>No potential impacts on the SPA envisaged due to:</b></p> <p><b>The intervening distance between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The intervening distance is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, airborne pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.</li> </ul> <p><b>The absence of a significant hydrological connection between the Proposed Development and the SPA.</b></p> <ul style="list-style-type: none"> <li>The distance between the Site and the SPA and the consequent dilution factor eliminates the risk of any potential surface water discharges containing sediment, silt and/or pollutants arising from the Construction of the Proposed Development contaminating the SPA.</li> </ul> <p><b>The current and future operation of Ringsend WwTP.</b></p> <p>The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay, and therefore this SAC, and cause significant effects is negligible due:</p> <ul style="list-style-type: none"> <li>On-going upgrade works which will increase the capacity of the facility from 1.6 million PE to 2.3 million PE.</li> <li>Effects on marine biodiversity and the Natura 2000 sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.8.3 for more details).</li> <li>No significant in-combination effects with the current operation of Ringsend WwTP are anticipated. Refer to section 3.8.3 for details.</li> </ul> <p><b>There are no means for the Proposed Development to act in-combination with any granted planning permissions, plans, or projects, that would cause any likely significant effects on any European sites.</b></p> | NO                          |

| European site | Distance to Proposed Development | Summary of potential for significant impacts on European site   | Further Assessment Required |
|---------------|----------------------------------|---|-----------------------------|
|               |                                  | <p><b>The incorporation of SUDS into the design of the Proposed Development, which is mandatory for all new developments under the Greater Dublin Regional Code of Practice for Drainage Works.</b></p> <p><b>The lack of suitable habitat for qualifying interests of the SPA within, or within close proximity, to the Proposed Development.</b></p> <p>The Site of the Proposed Development is not considered to be suitable and/or significant ex-situ breeding, roosting, staging or foraging habitats for the species listed as qualifying interests for the SPA.</p> |                             |

**TABLE 3. 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 |
|---|---------------------------|----------------------------------|--|-------------------------------|--|------------------------|---------------------|
| <b>SAC</b>  |                           |                                  |  |                               |  |                        |                     |
| South Dublin Bay SAC (000210)                         | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Wicklow Mountains SAC (002122)                        | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Knocksink Wood SAC (000725)                           | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Ballyman Glen SAC (000713)                            | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Rockabill to Dalkey Island SAC (003000)               | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| North Dublin Bay SAC (000206)                         | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Glenasmole SAC (001209)                               | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Bray Head SAC (000714)                                | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Howth Head SAC (000202)                               | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Baldoyle Bay SAC (000199)                             | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| <b>SPA</b>  |                           |                                  |  |                               |  |                        |                     |
| South Dublin Bay and River Tolka Estuary SPA (004024) | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Wicklow Mountains SPA (004040)                        | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Dalkey Islands SPA (004172)                           | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| North Bull Island SPA (004006)                        | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Howth Head Coast SPA (004113)                         | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |
| Baldoyle Bay SPA (004016)                             | No                        | No                               | No   | None                          | None                                     | None                   | NO                  |

#### **4 APPROPRIATE ASSESSMENT SCREENING CONCLUSION**

The Proposed Development at Ravens Rock Road, Sandyford, Dublin 18, has been assessed taking into account:

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

Upon 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 scientific information, the possibility that the Proposed Development, either on its own or in combination with other plans or projects, will have a significant effect on any of the European Sites listed below (or any other European Site), **may be excluded**:

South Dublin Bay SAC (000210)

Wicklow Mountains SAC (002122)

Knocksink Wood SAC (000725)

Ballyman Glen SAC (000713)

Rockabill to Dalkey Island SAC (003000)

North Dublin Bay SAC (000206)

Glenasmole SAC (001209)

Bray Head SAC (000714)

Howth Head SAC (000202)

Baldoyle Bay SAC (000199)

South Dublin Bay and River Tolka Estuary SPA (004024)

Wicklow Mountains SPA (004040)

Dalkey Islands SPA (004172)

North Bull Island SPA (004006)

Howth Head Coast SPA (004113)

Baldoyle Bay SPA (004016)

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

## 5 REFERENCES

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

**Environmental Protection Agency. (2020).** Environmental Protection Agency Online Mapping [ONLINE] Available at: <http://www.epa.ie/> [Accessed April 2021].

**European Commission. (2000).** Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Communities, Luxembourg.

**European Communities. (2002).** 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.

**Fossitt, J. (2000).** *A Guide to Habitats in Ireland*. The Heritage Council, Kilkenny.

**Franklin, A. N. (2002).** What is Habitat Fragmentation? *Studies in Avian Biology*, 20-29.

**Geological Survey Ireland. (2020).** Geological Survey of Ireland website [ONLINE] Available at: <http://www.gsi.ie/> accessed [Accessed April 2021].

**Irish Water. (2018).** Ringsend Wastewater Treatment Plant Upgrade Project Environmental Impact Assessment Report: Volume 3 - Ringsend Wastewater Treatment Plant Part A: Report

**NPWS. (2012).** Conservation Objectives: Baldoyle Bay SAC [000199]. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

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

**NPWS. (2013b).** Conservation Objectives: Rockabill to Dalkey Island SAC [003000]. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

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

**NPWS. (2013d).** Conservation Objectives: Baldoyle Bay SPA [004016]. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

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

**NPWS. (2016).** Conservation Objectives: Howth Head SAC [000202]. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

**NPWS. (2017a).** Conservation Objectives: Wicklow Mountains SAC [002122]. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

**NPWS. (2017b).** Conservation Objectives: Bray Head SAC [000714]. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

**NPWS. (2019).** Conservation Objectives: Ballyman Glen SAC [000713]. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.

**NPWS. (2021a).** Conservation objectives for Knocksink Wood SAC [000725]. Generic Version 8.0. Department of Housing, Local Government and Heritage.

**NPWS. (2021b).** Conservation objectives for Glenasmole Valley SAC [001209]. Generic Version 8.0. Department of Housing, Local Government and Heritage.

**NPWS. (2021c).** Conservation objectives for Wicklow Mountains SPA [004040]. Generic Version 8.0. Department of Housing, Local Government and Heritage.

**NPWS. (2021d).** Conservation objectives for Dalkey Islands SPA [004172]. Generic Version 8.0. Department of Housing, Local Government and Heritage.

**NPWS. (2021e).** Conservation objectives for Howth Head Coast SPA [004113]. Generic Version 8.0. Department of Housing, Local Government and Heritage.