PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT ON LANDS AT ST. TERESA'S, TEMPLE ROAD, MONKSTOWN, BLACKROCK, CO. DUBLIN

Appropriate Assessment Screening Report

Oval Target Ltd.

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1 INTRODUCTION

1.1 Background

DNV was commissioned by Brock McClure, on behalf of Oval Target Ltd. to prepare an Appropriate Assessment (AA) Screening Report for a Proposed Modifications to the Permitted (2019) Residential Development on lands at St. Teresa's, Temple Road, Monkstown, Blackrock, Co. Dublin, hereafter referred to as 'Proposed Amendments' or 'Site', when referring to the application Site area: 2019 application ref: D19A/0398. This report contains information to enable the Competent Authority to undertake Stage 1 AA screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants. Field work has been completed by TR and BM, both experienced ornithologists/field ecologists with DNV. This report has been authored by BS, Ecologist with DNV, reviewed by CBH, Senior Ecologist with DNV and approved by MP, a Principal Ecologist within DNV.

TR is an experienced Ecologist who has specialised in ornithology and terrestrial mammals with over 8 years' experience in ecological consultancy along with a lifetime of personal interest and experience in wildlife management. TR has a B.Sc. in Environmental and Natural Resource Management (Hons) and a Post-Graduate Diploma in Environmental Management with GIS. TR has extensive field experience with further experience and competencies in desktop research, preparing AA Screening Reports (AA), Ecological Impact Assessment Reports (EcIAs), Bird Activity Reports and detailed Species-Specific Maps. His ability to deal with and understand a range of species, survey methods and habitats is excellent, having an in-depth knowledge and understanding of EU and Irish legislation.

BM is an Ecologist and experienced Ornithologist with 12 years of bird survey experience. BM is a longstanding and active member of Bird Watch Ireland and has provided Ornithology survey work for ecological consultancies, e.g., vantage points surveys of gulls, terns, raptors, waders, and wildfowl; hinterland surveys of the above as well as riverine species; and breeding waders and country birds. Brian is highly experienced with all survey methodologies and with surveying all species groups of Irish birds and migrants.

BS is a seconded Ecologist with Enviroguide and has both a BSc (Hons) in Ecological and Environmental Sciences, and an MSc in Carbon Management from the University of Edinburgh. BS has experience in environmental and ecological data collection, field surveys and report writing and has previously undertaken projects in natural flood management and invasive species mapping. BS has experience in undertaking ecological desk studies, undertaking Appropriate Assessment screenings and various other ecological reports.

CBH is a Senior Ecologist with DNV and has a BSc. (Hons) in Wildlife Biology from Munster Technological University (formerly ITT). CBH has a wealth of experience in desktop research, literature review and reporting, as well as practical field and laboratory experience including experience in surveying habitats, plants, bats, birds, mammals, and invasive species. CBH is experienced in the preparation of PEA, EcIA, and Stage I/Stage II AA Reports, as well as ornithology reports for renewable energy projects (wind and solar technology). Additionally, CBH has completed, and supported the preparations of several Biodiversity Chapters for Environmental Impact Assessment Reports (EIAR). CBH is also a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

1.3 Description of Proposed Amendments

1.3.1 Site Location

The application pertains to Proposed Amendments to a Permitted LRD Development which is located at St. Teresa's, Temple Hill, Temple Road, Monkstown, Blackrock, Co. Dublin. The Site is bounded to the north by Temple Road, with mature residential development to the East (St. Vincent's Park) and the Alzheimer's Society of Ireland and existing residential development (St. Louise's Park and Barclay Court) to the West. The Site is within 0.5 km of Blackrock Village and has high accessibility to public transport. The extent of the overall Site (4.56 ha) includes additional lands along

Temple Hill as shown in Figure 1 below. These extra lands along Temple Hill are included to provide for appropriate access proposals as permitted.

1.3.2 Proposed Amendments Description

Oval Target Limited intends to apply for permission for development of a Large-Scale Residential Development comprising amendments to the previously permitted application (ABP-303804-19) on lands at 'St. Teresa's House' (A Protected Structure), and 'St. Teresa's Lodge' (A Protected Structure) and associated entrance gates (A Protected Structure) all on a site of approx. 4.56 ha at Temple Hill and Temple Road, Monkstown, Blackrock, Co. Dublin.

The proposed development will consist of revisions to a development previously permitted under SHD ABP-303804-19 (291 no. residential units, a crèche facility and heights of 1-8 storeys) to provide for a new residential and mixed use development (1 – 8 storeys overall) of 414 no. residential units in total (a proposed uplift of 123 no. residential units) with associated crèche facility, a new café and residential amenity space.

The proposed development will consist of:

1. Amendments to previously permitted Blocks C1, C2, C3, D1, E1, E2, E3, E4 and E5 as follows:

    - A revised building design for Block C1 from previously permitted building (3 storeys overall) consisting of 7 no. apartment units (6 no. 2 bed units and 1 no. 3 bed unit) to now comprise **10 no. apartment units** (4 no. 1 bed units and 6 no. 2 bed units) including minor revisions to height (remains 3 storeys overall) and revisions to elevations and building footprint – an uplift of 3 no. residential units in total.

    - A revised building design for Block C2 from previously permitted building (3 storeys overall) consisting of a crèche facility (approx. 286 sq m) at level 00 and 4 no. apartment units at level 01 and 02 (3 no. 2 bed units and 1 no. 3 bed unit) to now comprise a crèche facility of approx. 401 sq m at level 00 and associated outdoor play area space of 302 sq m and **6 no. apartment units** (2 no. 1 bed units and 4 no. 2 bed units) at levels 01 and 02 including minor revisions to height (remains 3 storeys overall), and revisions to elevations and building footprint – an uplift of 2 no. residential units and increased crèche floor area size by approx. 115 sq m.

    - A New Block C3 (1 storey over basement level) comprising residential amenity space of approx. 451 sq m.

    - The omission of previously permitted Block D1 (5 storeys overall) and basement level comprising 50 no. apartment units (15 no.1 bed units, 23 no. 2 bed units and 12 no. 3 bed units) to now deliver new Block D1 (4 - 7 storeys over new basement level) comprising **125 no. apartment units** (19 no. 1 bed units, 68 no. 2 bed units and 38 no. 3 bed units) – an uplift of 75 no. residential units.

    - The omission of previously permitted Block E1 (5 storeys overall) comprising 14 no. apartment units (9 no. 2 bed units, 4 no. 3 bed units and 1 no. 3 bed duplex unit) to now deliver new Block E1 (4 - 7 storeys) comprising **61 no. apartment units** (7 no. studio units, 6 no. 1 bed units, 26 no. 2 bed units and 22 no. 3 bed units) – an uplift of 47 no. residential units.

    - The omission of previously permitted Block E2 (5 storeys overall) comprising 15 no. apartments units (9 no. 2 bed units, 4 no. 3 bed units and 2 no. 3 bed duplex units) to now deliver new Block E2 (6 storeys) comprising **50 no. apartment units** (1 no. studio unit, 25 no. 1 bed units, 20 no. 2 bed units and 4 no. 3 bed units) – an uplift of 35 no. apartment units.

    - The omission of permitted Blocks E3 (5 storeys), E4 (4 storeys) and E5 (5 storeys) previously providing for 38 no. units in total (27 no. 2 beds, 8 no. 3 beds and 3 no. 3 bed duplex units).

    - Each residential unit has associated private open space in the form of a terrace / balcony.

The above new proposals extend to a total of **252 residential units**.

Blocks A1, B1, B2, B3, B4, Block H (St. Teresa's House) remain as originally permitted with no further amendments as part of this proposal (162 no. units in total and permitted heights of 3-8 storeys).

2. The structures for demolition across the site remain as permitted with no further amendments proposed. This includes any structures previously permitted for demolition that still remain on site and the removal of associated remnants of low / retaining walls and in-ground concrete steps.

3. An amended proposal for Block G (St. Teresa's Lodge) (1 storey) including a change of use from previously permitted 1 no. 1 bed unit to a new café of approx. 67.4 sq m. This proposal will again seek permission for the dismantling/deconstruction of the existing St. Teresa's Lodge (approx. 38.56 sq m) and demolition of a lean to extension (approx. 28.5 sq m) as previously permitted under SHD ABP-303804-19. The current amendment proposal seeks permission to relocate and reconstruct St. Teresa's Lodge in a new location (180 m southwest of its original position and located adjacent to Rockfield Park) using original roof timbers, decorative elements and rubble stonework, with original brickwork cleaned and re-used where appropriate. The non - original extension (approx. 28.5 sq m) will be again removed as previously permitted. The current proposal seeks further extension of this building (approx. 28.88 sq m) and a change of use from residential (1 no. unit) to café use to deliver a Part M compliant single storey building of approx. 67.4 sq m.

4. A revised landscape plan now provides for:

    - Public open space in the form of a central parkland, garden link, woodland park (incorporating an existing folly) and a tree belt (approx. 11,238 sqm overall).

    - Communal open space is now proposed in the form of entrance gardens, plazas, terraced gardens and roof terraces (approx. 3,620 sqm overall).

    - Provision is also now made for 2 no. new pedestrian connections to Rockfield Park on the southern site boundary (1 no. adjacent to the proposed relocated Gate Lodge and 1 no. at the hammerhead adjacent to Block E2) and all other pedestrian connections remain as permitted under SHD ABP-303804-19.

5. A revised total of 244 no. car parking spaces (a decrease of 28 no. spaces); 962 no. bicycle spaces (an uplift of 296 no. spaces) are proposed. The no. of motorcycle spaces remains as permitted at 20 no. spaces.

6. The development also provides for revised proposals for Bin Storage areas, Bike Storage areas, life safety generator room, ESB substations and switch rooms with a combined floor area of approx. 609 sq m all at surface level.

7. Access to the development generally remains as permitted under SHD ABP-303804-19, which provides for works to the existing entrance to the overall site via Temple Hill and Temple Road to deliver the realignment and upgrade of the existing signalised junction and associated footpaths, with minor modifications to the junction layout to provide for improved and safer vehicular access/egress to the site and to/from St. Vincent's Park. Emergency vehicular access and pedestrian/cycle access also remains as permitted via a secondary and long-established existing access point along Temple Hill. There are no works proposed to the existing gates (Protected Structure) at this location. There are minor modifications proposed to the northeastern boundary walls and access gateway to 'Carmond' to facilitate alignment improvements for safe access/egress serving St. Vincent's Park.

8. The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; green roofs; PV panels; boundary treatment; internal roads and footpaths.

This planning application is accompanied by a Natura Impact Statement (NIS) and Environmental Impact Assessment Report (EIAR).

See Figure 2 below for Site Layout.

1.3.2.1 Surface water

Existing Surface Water Drainage

Surface water from St Teresa's is currently conveyed through the combined sewer network within the Site boundary. The public surface water drainage network on Temple Hill Road conveys storm water west to discharge onto the culverted Carysfort-Maretimo stream. The Site generally drains South-East to Northwest (JJC, 2025a). There is also an existing 900Ø combined sewer running along the west boundary of the Site.

Proposed Surface Water Drainage

It is proposed to separate the storm runoff from the existing and proposed buildings and to use SuDS techniques, as per the Greater Dublin Strategic Drainage Study (GDSDS), to control stormwater discharge from the Site. (Figure 3).

A storm water carrier pipe will be provided around the Site to intercept runoff and, where located within filter drains, will be perforated pipe. Because of the sloping topography of the Site, it is proposed to make two surface water connections serving two zones each comprising approximately 50% of the Site area. A petrol interceptor will be installed to serve underground car parks. The Site's drainage system will connect to the existing public sewer on Temple Road. (JJC, 2025a, JJC, 2025b).

The Site's stormwater drainage system has been designed using the modified rational method, in accordance with the following standards and guidelines:

- Greater Dublin Strategic Drainage Study (GDSDS).
- Greater Dublin Regional Code of Practice for Drainage Works.
- Irish Water's Code of Practice for Wastewater Infrastructure, Connections and Developer Services.
- CIRIA C753 – The SUDS Manual.
- Causeway Storm Water Analysis software was used to model and design the stormwater network.

As previously stated, the design incorporates Sustainable Urban Drainage Systems (SUDS) principles and complies with local authority and Irish Water requirements to ensure sustainable and effective stormwater management. Stormwater Attenuation and Discharge will be per the following:

- Attenuation Volume: 1,800 m³, including a 20% climate change allowance.
- Maximum Discharge Rate: Limited to 8.17 litres/second.
- Detailed calculations are provided in Annexes D, E, and F of the main drainage planning report.
- Additional Infrastructure

(JJC, 2025a).

SUDS Strategy

Sustainable urban drainage is a concept that incorporates long term environmental and social factors into drainage design. It takes account of both the quantity and quality of runoff as well as the amenity value of surface water in the urban environment.

All storm drainage work within the Proposed Amendments lands shall be designed as constructed in accordance with the following:

1. GDSDS.
2. CIRIA SuDS Manual (C753).

The criteria set out in the above will help confirm the surface water strategy and SuDS management train of the development.

- A **Green and Blue Roof** at topmost apartment roofs**, Blue Roof** at stepped terraces and **Green Roof** on ancillary single-story buildings is proposed throughout the development, at a minimum of 70% of the flat roof surface area

and will be installed as per Appendix B in Dun Laoghaire Rathdown Development Plan 2022 – 2028. See drawing C11 for calculation of areas. The Green and Blue Roofs / Blue Roofs and Green Roofs will be a Beton / ACO system, or similar, details of which are included in Appendix B to this report. This system allows for the installation of photovoltaic panels above the Green and Blue roof with minimal loss of effective area of the roof. The Green and Blue will provide interception storage and will attenuate storm water at roof level which will then be connected to the new surface water system. Access to the roofs for maintenance will be via the automatic opening vents at the top of the stairwells in each building. Secondary access to the roofs will be by a cherry picker from the adjoining roads for maintenance (JJC, 2025b).

- **Dry swales / infiltration trenches** are a useful and natural means of surface water collection and treatment of the first 5mm of runoff. The application of swales / infiltration trenches was examined as part of the design process. Because of the mature trees, to be retained as part of the development, the widespread use of swales cannot be implemented as the necessary trenches would damage the tree root systems, but swales / infiltration trenches shall be installed where they do not damage existing mature trees (JJC, 2025b).

  Similar issues could potentially arise regarding traditional pipe drainage in trenches, however, the piped drainage system for the development Site has been designed to avoid heavily rooted areas, particularly along the main access avenue. It is anticipated that the road surface along the access avenue will be replaced as part of the development. As part of the surface replacement works, a cross-fall will be incorporated into the road surface so that rainwater will be directed onto landscaped areas and thereby flow overland to the drainage system. This ensures that low intensity rainfall on the avenue will not reach the drainage system as it will be infiltrated directly into the soil and that any water reaching the drainage system will have a degree of pre-treatment before entering the drainage system. Provision has been made at two key points along the avenue to collect water from the road surface in order to prevent flooding on the avenue from significant rainfall events (JJC, 2025b).

- **Permeable paving** will intercept the first 5mm of runoff from all impermeable areas of the Site. 50% of the onsite soakaways passed and 50% had poor / failed infiltration, a high-level perforated overflow pipe will be provided from the permeable pavements and will connect to the new gravity storm network, some infiltration will take place in the stone below the areas with poor / failed infiltration and the overflow pipe will retain flow which will slowly infiltrate or evaporate (JJC, 2025a).

1.3.2.2 Potable Water

Existing Watermain Installation

The existing Site is connected to an existing IW 400Ø watermain located on Temple Hill Road.

Proposed Watermain Installation

A new 200 mm internal diameter distribution watermain is proposed to serve the development. This new main will be connected to the existing 400 mm Irish Water watermain located on Temple Hill Road. The existing watermain supplying the adjacent St. Catherine's lands, originally laid in 1943, will be replaced along St. Teresa's Avenue due to its age and nearing the end of its service life. All watermain installation and replacement works will be carried out in accordance with the Irish Water publication (JJC, 2025a).

1.3.2.3 Foul Drainage

Existing Foul Water Drainage

Foul water from St Teresa's is currently conveyed through the combined sewer network within the Site boundary. Temple Hill Road is served by a 1200mmØ combined sewer. The combined sewers within St Teresa's Lands discharges to the 1200mmØ combined sewer in Temple Hill Road. This trunk main is routed to the Dun Laoghaire West Pier pumping station where it is pumped to Ringsend Wastewater Treatment Plant (WwTP) (JJC, 2025a).

Proposed Foul Water Drainage

Domestic effluent from the Site will discharge to the existing foul drainage system located on Temple Hill Road. The connection will be made via an existing 300 mm pipe to a 1200 mm diameter combined sewer. Flow rates are based on the Irish Water Code of Practice for Wastewater. Foul water drainage calculations are detailed in Section 3.0 of the main drainage planning report. All existing drains will be surveyed prior to construction to confirm invert levels and ensure compatibility with the proposed drainage system (JJC, 2025a).(Figure 3).

FIGURE 1. SITE LOCATION.

FIGURE 2. PROPOSED SITE LAYOUT (O'MAHONY PIKE, 2026).

FIGURE 3. PROPOSED SURFACE WATER AND FOUL WATER DRAINAGE (JJC, 2025B).

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

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

It is the responsibility of each Member State to designate SPAs and SACs, both of which will form part of the Natura 2000 Network, a network of protected Sites throughout the European Community. These designated Sites are referred to as "Natura 2000 Sites" or "European Sites". SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each Site is selected correspond to the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the Sites; from these the conservation objectives of the Site are derived.

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

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

2.1.1 Legislative Context

The obligations in relation to AA have been implemented in Ireland under the Planning and Development Act 2000 (as amended), and the Planning and Development Act 2024. While the 2024 Act has been signed into law, the Planning and Development Act 2000 (as amended) will continue to apply until repealed and the new provisions commenced by way of Ministerial Order. The phased commencement of the new Planning and Development Act is expected to take place up to early 2026.

The obligations in relation to AA covered within both Acts are summarised below:

- The competent authority must carry out screening for AA for all relevant plans and projects, to determine whether the plan or project, in view of best scientific knowledge, is likely to have a significant effect on any European Site;
- Where potential for likely significant effects cannot be ruled out, either as a result of the plan or project alone or in-combination with other plans or projects, or where uncertainty exists, the competent authority must determine that an AA is required. In this case, a more detailed examination of the relevant European Sites shall be carried out, and a Natura Impact Statement must be prepared.

For further details on both the 2000 Act (as amended) and the 2024 Act, please refer to irishstatutebook.ie.

2.1.2 Relevant Case Law

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

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

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS) in large-scale residential developments), that are incorporated into the design of a proposal or project and which may result

in a reduction of effects impacting European Sites, but where the primary reason of the embedded mitigation is not to protect a European Site, are permitted for consideration during the undertaking of AA.

2.2 Policy Context

2.2.1 Dún Laoghaire-Rathdown County Development Plan 2022 – 2028

Policies and objectives of the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028 that are of relevance to this Screening Report are outlined below:

- **GIB11:** Coastal Area Feasibility Study It is a Policy Objective to explore undertaking a comprehensive feasibility study on the recreational potential along the coastal area of the County, which comprehensively addresses recreational impact - including visitor numbers, mapping and surveying of sensitive habitats and species and identification of significant threats on European Sites - and which would allow an assessment of any future proposals, alone or in combination, to assess impact on the coastal and marine zone within and adjacent to the County boundary. The Council will explore the possibility of carrying out this study with adjoining and/or coastal Local Authorities and/or other agencies.
- **GIB18:** Protection of Natural Heritage and the Environment It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated Sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar Sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.
- **GIB19:** It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European Sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.
- **GIB21:** It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.
- **GIB22:** It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable Sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire-Rathdown Version 2014).
- **GIB23:** It is a Policy Objective to protect the Ecological Network which will be integrated into the updated Green Infrastructure Strategy and will align with the DLR County Biodiversity Action Plan. Creating this network throughout the County will also improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include non-designated Sites.
- **GIB25:** It is a Policy Objective to retain and protect hedgerows in the County from development, which would impact adversely upon them. In addition, the Council will promote the protection of existing Site boundary hedgerows and where feasible require the retention of these when considering a grant of planning permission for all developments. The Council will promote the County's hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance. The Council will promote the protection of existing hedgerows when considering a grant of planning permission for all developments.

- **GIB28:** It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on Sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).

2.2.2 Dún Laoghaire-Rathdown Biodiversity Action Plan 2021-2025

Dún Laoghaire-Rathdown Biodiversity Action Plan (BAP) is set out to protect and improve biodiversity, following five main themes:

1. Biodiversity research including climate change adaption and mitigation;
2. Building for Biodiversity;
3. Delivery of the Ecological Network across the Dún Laoghaire-Rathdown;
4. Raising awareness among the public, local communities, and council staff; and,
5. Increased collaboration with stakeholders.

2.3 Stages of Appropriate Assessment

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

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

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

- **Stage 1: Screening.** The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.
- **Stage 2: NIS.** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site(s) despite mitigation, it can only grant consent after proceeding through stages 3 and 4.
- **Stage 3: Derogation from Article 6(3) under certain circumstances.** 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. Stage 3 requires:
    - Examination of alternative solutions, and, where no alternative solution exists;
    - 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.
    - Implementation of compensatory measures to maintain the coherence of the Natura 2000 network.

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

3 AA Screening Methodology

3.1 Guidance

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

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

3.2 Screening Steps

Screening for AA involves the following steps:

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

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

3.3 Desk Study

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

- Information on the network of European Sites, boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at *www.npws.ie*;
- Text summaries of the relevant European Sites taken from the respective Standard Data Forms (available at *https://natura2000.eea.europa.eu/*) and Site Synopses (available at *www.npws.ie*);
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at *www.gis.epa.ie*;

- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at www.gsi.ie;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the Dún Laoghaire-Rathdown online planning database (DLRCC) and the National Planning Database (DHLGH, 2023).

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

3.4 Field Surveys

A range of ecological field surveys have been carried out at the Site to date. These are summarised in Table 1. For full details on the methods and results of the fields surveys listed, please refer to the Ecological Impact Assessment (EcIA) accompanying this application under separate cover. All surveys were carried out at the appropriate time of year by suitably qualified ecologists. No limitations to field surveys were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development. Results relevant to this Screening Report have been summarised in section 4.2.2.

TABLE 1. FIELD SURVEYS UNDERTAKEN AT THE PROPOSED DEVELOPMENT SITE.

Survey	Surveyor	Dates
Preliminary walkover survey	SH	6th April 2023
Updated PEA walkover survey	SH	11th April 2025
Breeding bird surveys X3	TR	20th May 2025 10th June 2025 11th July 2025

3.5 Identification of Relevant European Sites

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

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

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

The relevant European Sites were identified based on the following:

- Identification of potential sources of effects based on the Proposed Development description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by SCI bird species outside of their designated SPAs);

- Use of up-to-date GIS spatial datasets for European designated Sites and water catchments – downloaded from the NPWS Website (www.npws.ie) and the EPA Website (www.epa.ie) to identify European Sites which could potentially be affected by the Proposed Development; and
- Identification of potential pathways between the Site of the Proposed Development and any European Sites within the ZOI of any of the identified sources of effects.
    - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any European Sites.
    - Groundwater, soils, and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any European Sites.
    - Air and land connectivity assessed based on Proposed Development details and proximity to European Sites.
    - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Defining the likely ZOI based on the identified sources of effects and potential pathways between the Proposed Development and any European Sites.

3.6 Assessment of Significant Effects

The conservation objectives of the European Sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed Development has the potential to result in likely significant effects (LSEs) on any of the QIs and/or conservation objectives listed for the Site.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., "*Assessment of plans and projects significantly affecting Natura 2000 Sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*".

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

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

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

3.7 Limitations

No limitations were encountered which would prevent robust conclusions from being drawn as to the potential impacts of the Proposed Amendment Development and therefore the likely significant effects on the European Site, in view of the Site's conservation objectives.

4 STAGE 1 SCREENING ASSESSMENT

4.1 Management of European Sites

The Proposed Amendment Development is not directly connected with or necessary to the management of European Sites.

4.2 Existing Environment

4.2.1 Desk Study Results

4.2.1.1 Hydrology, Geology and Hydrogeology

The Proposed Amendments is located within the Liffey and Dublin Bay Catchment and the Dodder_SC_010 sub-catchment. The closest waterbody to the Site is the Carysfort-Maretimo Stream (a.k.a. Brewery Stream) (IE_EA_09B130400) which flows in a north easterly direction past the west side of the Site approximately 0.025km from the Site boundary. The Carysfort-Maretimo Stream flows for approximately 0.34km before entering Dublin Bay (IE_EA_090_0000) at Blackrock. The WFD status of the Carysfort-Maretimo Stream is 'poor' and its risk projection is currently under review. The WFD (2019-2024) status of Dublin Bay is 'Good', and its risk projection is 'Not at Risk' (EPA, 2025).

The Monkstown Stream is the next closest to the Site of the Proposed Amendment; this is situated approximately 0.56km southeast of the Site where it also flows into Dublin Bay after 1.4km. However, the Monkstown Stream is not recognised by the Environmental Protection Agency (EPA) therefore has not been classified with a WFD status or risk projection. There are no EPA monitoring stations within the relevant locations within either stream.

The groundwater body beneath the Site of the Proposed Amendment is the Kilcullen groundwater body (IE_EA_G_003). The status of this groundwater body is 'Good' however its risk projection is 'At risk'. Groundwater vulnerability at the Site is 'High' with a small section to the west of the Site classed as 'Moderate' (EPA, 2025).

Soil at the Site is classified as 'Urban – soil concreted over'. Regarding sub-soils, the Site is composed of 'Made soils – concreted or artificial surface' within the northerly half and 'Limestone till (Carboniferous)' consisting of till type subsoil in the southerly half of the Site.

TABLE 2. WFD RISK AND WATER BODY STATUS

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km)	WFD water body status (2019-2024)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
Carysfort-Maretimo Stream	IE_EA_09B130400	West	0.025	Poor	Under Review	0.025km west of the Site
Coastal Water Bodies						
Dublin Bay	IE_EA_090_0000	North	0.3	Good	Not at Risk	Downstream of the Carysfort-Maretimo Stream
Groundwater Bodies						

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km)	WFD water body status (2019-2024)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Kilcullen	IE_EA_G_003	N/A	N/A	Good	At Risk	Underlying groundwater-body

4.2.2 Relevant Field Survey results

4.2.2.1 Habitats & Flora

The Site consists of a number of habitats including dry meadow (GS2), broadleaved woodland (wd1), scattered trees and parkland (WD5), scrub (WS1), buildings and artificial surfaces (BL3) and small areas of amenity grassland (GA2). Treelines and hedgerows were also present. No rare or protected habitats, or schedule III invasive species under the Habitats Directive were recorded on-Site throughout any visits.

4.2.2.2 Fauna

A total of 31 species were recorded within the redline boundary throughout the three breeding bird surveys undertaken at the Site for the 2025 breeding bird season. The majority of observations were of common and widespread species.

Herring gull (BoCCI Amber listed) was recorded on all survey visits during the survey period and is confirmed to have successfully hatched chicks on the Teresa's House building. Three pairs were present on the chimney structures and breeding was confirmed in June and July 2025 where recently hatched young were present alongside nest structures. Three hatched young were observed in total. Herring Gull is an SCI species (breeding) for the Northwest Irish Sea SPA (004326) located 5.4km east of the Proposed Amendments.

The relatively common and widespread **goldcrest** which is listed on the BoCCI Amber List (2020-2026) due to a declining population trend was frequently encountered during surveys, which is to be expected in most areas of suitable woodland, treelined gardens and parks in Ireland.

Of note were observations of BoCCI Red listed **Swift** which were observed foraging over the hedgerows and treelines on Site in June and July, no breeding behaviour was observed, and swift are classed as non-breeding in the immediate vicinity of the Site.

Starling and swallow were also recorded in flight over the Site; however, no breeding activity was recorded for these species.

No other fauna relevant to the assessment of potential significant effects on European Sites were recorded. For full details on field surveys undertaken at the Site, please refer to the accompanying Biodiversity Chapter of the EIAR (DNV, 2025).

4.3 Identification of Relevant European Sites

4.3.1 Potential Sources of Impacts

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

Construction Phase

Estimated duration: ***48 months total including Demolition (9 months - complete), Phase 1 (18 months) and Phase 2&3 (30 months)***

- Uncontrolled releases of dust, sediments and/or other pollutants to air due to earthworks;
- Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies or surface water network;
- Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater;
- Waste generation during the Construction Phases comprising soils and construction 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;
- Increased human presence and activity as a result of construction activity; and,
- Potential loss of ex-situ habitat for SCI species.

Operational Phase *(Estimated duration: Indefinite)*

- Surface water drainage from the Site of the Proposed Amendment;
- Foul water from the Proposed Amendment;
- Increased lighting at the Site and in the vicinity emitted from the Proposed Development; and
- Increased human presence and activity at the Site and in the vicinity as a result of the Proposed Amendment.
- Potential collision risk of SCI species with Proposed Amendment buildings.

4.3.2 Potential Pathways to European Sites

For the above listed potential sources of effects to have the potential to cause likely significant effects on any European Site, a pathway between the source of potential effects (i.e., the Site of the Proposed Development) and the receptor is required. Potential impact pathways are discussed in the following sections in the context of the identified impact sources as identified in section 4.3.1.

4.3.2.1 Direct Pathways

Hydrological pathways

Construction Phase

During the Construction Phase, works are proposed to be carried out on Site. These works, and in particular, groundworks, have the potential to produce sources of pollution in the form of siltation, fuel spills, etc. The Site boundary is 2.5m from the Carysfort-Maretimo Stream. During a rainfall event, these pollutions may be carried via

the medium of surface water into the Carysfort-Maretimo Stream (either directly or via the existing drainage layout), which serves as a hydrological pathway of only 0.34km connecting the Site with **South Dublin Bay SAC (000210)** and **South Dublin Bay and River Tolka Estuary SPA (004024)**.

Additionally, while Wicklow Mountains SAC (002122) is located at a significant remove, upstream, from the Proposed Development, Otter (*Lutra lutra*) could be present in the Carysfort-Maretimo Stream which is located 0.025km from the Site boundary, which flows for approximately 0.34km before entering Dublin Bay (IE_EA_090_0000) at Blackrock. Otter is an SCI species of the Wicklow Mountains SAC (002122). This pathway is therefore **assessed further in this Report.**

Operation Phase

As described in Section 1.3, surface water run-off from the operational phase of the Proposed Amendments Site will be collected and transported via a combined sewer to the culvert on the Carysfort-Maretimo Stream. This forms a direct hydrological pathway via operational phase discharges to Dublin Bay; the location of the closest European Sites; **South Dublin Bay SAC (000210)** and **South Dublin Bay and River Tolka Estuary SPA (004024).**

Although the use of SUDs as outlined in Section 1.3.2.1 are incorporated into the Operational Phase surface water design, these are not relied upon in any way to mitigate against impacts to downstream European Sites, however they will contribute to this overall effect.

The next closest European Sites to the Site of the Proposed Development are **Rockabill to Dalkey Island SAC (003000)** and **Dalkey Islands SPA (004172),** which are located southeast of the Site, and **North Bull Island SPA (004006)**, **Northwest Irish Sea SPA (004236)** and **North Dublin Bay SAC (000206)** located to the north. However, these are over 5km from the Site and are separated by a significant built urban landscape which would intercept any surface water hydrological pathways, during either construction or operational phases. **North Bull Island SPA (004006)**, **Northwest Irish Sea SPA (004236)** and **North Dublin Bay SAC (000206)** are additionally separated by a significantly large waterbody made up of Dublin Bay and the Liffey estuary, which will act as a significant buffer towards any hydrological pathway from the Site.

Hydrological pathways to the above, and all other remaining European Sites within the ZOI can be deemed insignificant.

Hydrogeological pathways

As outlined above during the Construction Phase; works on Site have the potential to generate sources of pollution. Rather than pollution running overland and entering streams which feed directly into European Sites, polluted surface water also has the potential to be absorbed into the underlying aquifer where it may then be transferred horizontally within the underlying bedrock.

As described in Section 2.4.1.1, the Kilcullen groundwater body on which the Site is situated on is assigned a *High* groundwater vulnerability status, which entails the ground is at a high risk of being vulnerable to surface water absorption, particularly with the progression of groundworks where much of the surface soil layer will be stripped in preparation for the Proposed Development. According to the summary of initial characterisation of the Kilcullen waterbody (GSI, 2025), typical groundwater flow paths of percolated water is in the order of a couple hundred meters with discharge occurring to the closest surface water feature.

A direct hydrogeological pathway between the Carysfort-Maretimo Stream and **South Dublin Bay SAC (000210)** and **South Dublin Bay and River Tolka Estuary SPA (004024)** exists, which provides the potential for impact arising from the Proposed Amendments.

All other European Sites are located out of range of the hydrogeological flow path distance. As such, hydrological pathways to these European Sites, and all other remaining European Sites within the ZOI are deemed insignificant.

Air and Land pathways

As noted in the previous application, given that the Site boundary of the Amendments to the Proposed Development does not directly overlap with any European Sites, it can be concluded that there is no direct land pathway between the Proposed Amendments and any European Sites.

In terms of air pathways, dust, noise, vibration and general anthropogenic impacts may be produced as a result of the Construction Phase of the Proposed Development. For terrestrial and marine mammal species, disturbance effects would not be expected to extend beyond 150m[1]. For birds, disturbance effects would not be expected to extend beyond a distance of *c.* 300m, as noise levels associated with general construction activities would attenuate to close to background levels at that distance [2]. Although **South Dublin Bay SAC (000210)** and **South Dublin Bay and River Tolka Estuary SPA (004024)** are approximately 300m from the Site, there is a significant urban barrier in-between which will act as a buffer preventing the noise and dust from reaching these European Sites. The urban landscape barrier will also mean that bird species associated with the SPA are already acclimatised to noise disturbance, particularly as the urban barrier consists of a main road and trainline. Additionally, light spill is considered to be limited to areas within the Site and land immediately adjacent to the boundaries, areas not associated with these European Sites.

As a result of the above, any potential land and air pathways between the Proposed Development and European Sites are deemed insignificant.

4.3.2.2 Indirect Pathways

Foul Water Drainage

As described in Section 1.3.2.3, the foul drain will be connected to a combined sewer which routes to Ringsend WwTP, where, after treatment, it ultimately discharges to Dublin Bay. During events such as heavy floods, a fault at the plant or a disturbance which may prevent the WwTP from treating foul waters from the Proposed Development, foul waters from the Site could cause Likely Significant Effects (LSEs) on European Sites within the ZOI of this WwTP including **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** and **South Dublin Bay and River Tolka Estuary SPA (004024)**.

As a result of the above, it has been determined that an indirect hydrological pathway between the Site and including **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** and **South Dublin Bay and River Tolka Estuary SPA (004024)** may materialise during Operational Phase. Potential for significant effects as a result of this indirect hydrological pathway is discussed in detail below in Section 4.4.

Ex-Situ Habitat

Due to the Proposed Site's proximity to the **South Dublin Bay and River Tolka Estuary SPA (004024)**, **Dalkey Islands SPA (004172)**, **North Bull Island SPA (004006)** and **Northwest Irish Sea SPA (004236)** the Site has been assessed as to whether it suitable ex-situ habitat for SCI species.

As confirmed throughout surveys for the previous application, as well as the most recent breeding bird surveys completed in 2025 (Section 4.2.2), it is confirmed that the Site comprises limited areas of suitable foraging habitat (e.g. open amenity grassland) due to grasslands being enclosed by hedgerows and/or treelines, and due to the absence of suitable wetlands used by wintering SCI species from these SPAs within the relevant foraging and

[1] This is consistent with Transport Infrastructure Ireland (TII) guidance (Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes (2006) and Guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes (2005)) documents. This is a precautionary distance, and likely to be moderated by the screening effect provided by surrounding vegetation and buildings, with the actual ZoI of construction related disturbance likely to be much less in reality. This is based on the relationship between the noise levels generated by general construction traffic/works (BS 5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1 Noise) and the proximity of those noise levels to birds – as assessed in Cutts, N. Phelps, A. & Burdon, D. (2009) *Construction and Waterfowl: Defining Sensitivity, Response, Impacts and Guidance*, and Wright, M., Goodman, P & Cameron, T. (2010) Exploring Behavioral Responses of Shorebirds to Impulsive Noise. *Wildfowl* (2010) 60: 150–167. At 300m, noise levels are below 60dB or, in most cases, are approaching the 50dB threshold below which no disturbance or displacement effects would arise.

2 This is based on the relationship between the noise levels generated by general construction traffic/works (BS 5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1 Noise) and the proximity of those noise levels to birds – as assessed in Cutts, N. Phelps, A. & Burdon, D. (2009) Construction and Waterfowl: Defining Sensitivity, Response, Impacts and Guidance, and Wright, M., Goodman, P & Cameron, T. (2010) Exploring Behavioral Responses of Shorebirds to Impulsive Noise. Wildfowl (2010) 60: 150–167. At 300m, noise levels are below 60dB or, in most cases, are approaching the 50dB threshold below which no disturbance or displacement effects would arise.

breeding ranges. In addition, the majority of SCI species listed for the European Sites discussed are wetland and wader birds which would not be expected to use such habitat to breed.

However, given that 3 no. breeding pairs of Herring Gull *(Larus argentatus)*, an SCI species associated with **Northwest Irish Sea SPA (004236)**, were observed atop St Teresas House on-Site, an indirect air and land pathway between the Proposed Amendments and **Northwest Irish Sea SPA (004236)**, due to potential ex-situ habitat loss of SCI species breeding Sites, cannot be ruled out at this stage.

Collision Risk

Tall structures such as electrical pylons, wind farms and tall buildings can lead to fatal collisions with commuting bird species. This is particularly true for those species considered to be "poor" fliers, with relatively low manoeuvrability compared to other more agile bird species (see Eirgrid, 2012). Some of the most at-risk groups (classified as 'medium' and 'high' collision risk species) include wader species; waterfowl such as geese, swan and duck species, and some raptor species. Gulls such as black-headed gull, herring gull and lesser black-backed gull are classed as 'low' collision risk species due to their superior manoeuvrability when flying (Eirgrid, 2012).

Given that there have been amendments to the heights of the blocks and the design of the development since the last application, collision risk to SCI bird species of **South Dublin Bay and River Tolka Estuary SPA (004024)**, **Dalkey Islands SPA (004172)**, **North Bull Island SPA (004006)** and **North-West Irish Sea SPA (004236)** via this indirect land and air pathway cannot be ruled out at this stage and will be discussed later in this report.

4.3.3 Relevant European Sites

A European Site will only be at risk from likely significant effects where an S-P- R link exists between the Proposed Development Site and the European Site. All of the European Sites considered under the S-P-R method are listed in Table 3, all European Sites identified to have an S-P-R link of note to the Proposed Development Site are highlighted in green in the below.

TABLE 3. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. THOSE SITES WITH NOTABLE S-P-R LINKS ARE HIGHLIGHTED IN GREEN (IF ANY). QUALIFYING INTERESTS (QIS) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (EEA, 2025)[3].

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
SAC		
South Dublin Bay SAC [000210] Linear Distance to Proposed Development: approx. 3 km NE	**As per NPWS (2015)** **Habitats** • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • Salicornia and other annuals colonising mud and sand [1310] • Embryonic shifting dunes [2110]	Indirect hydrological

[3] Where applicable, the full species list included in this table is as per the latest updated information as indicated, so either the Conservation Objectives (CO) document for the Site, or the latest Standard Data Form (SDF) (EEA, 2023). For SDF updates, CO are not yet available for the newly added species but are assumed, for the purposes of assessment, to follow the same format as for other feature species.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
North Dublin Bay SAC [000206] Linear Distance to Proposed Development: approx. 5.4km NE	**As per NPWS (2013)** • Mudflats and sandflats not covered by seawater at low tide • Annual vegetation of drift lines • *Salicornia* and other annuals colonising mud and sand • Atlantic salt meadows (Glauco-Puccinellietalia maritimae) • Mediterranean salt meadows (*Juncetalia maritimi*) • Embryonic shifting dunes • Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) • Fixed coastal dunes with herbaceous vegetation (grey dunes) • Humid dune slacks • Petalophyllum ralfsii (Petalwort)	Indirect hydrological
Wicklow Mountains SAC [002122] Linear Distance to Proposed Development Approx. 22km SW	**As per NPWS (2017, Version 1)** Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) [3110] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with *Erica tetralix* [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Calaminarian grasslands of the *Violetalia calaminariae* [6130] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (*Androsacetalia alpinae and Galeopsietalia ladani*) [8110] Calcareous rocky slopes with *chasmophytic* vegetation [8210] Siliceous rocky slopes with *chasmophytic* vegetation [8220] Old sessile oak woods with *Ilex and Blechnum* in the British Isles [91A0] *Lutra lutra* (Otter) [1355]	Direct ~~Land / air in the form of potential disturbance during the construction phase and arising from potential negative water quality impacts~~ Weak hydrological link in the form of potential disturbance to otter during the construction phase arising from potential negative water quality impacts

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
Rockabill to Dalkey Island SAC [003000] Linear Distance to Proposed Development: approx. 5.4km E	**As per NPWS (2013)** • Reefs [1170] • Harbour porpoise *Phocoena Phocoena* [1351]	None
SPAs		
South Dublin Bay and River Tolka Estuary SPA [004024] Linear Distance to Proposed Development: approx. 3 km NE	**QIs as per NPWS (2015)** • Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Oystercatcher (*Haematopus ostralegus*) [A130] • Ringed Plover (*Charadrius hiaticula*) [A137] • Grey Plover (*Pluvialis squatarola*) [A141] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*) [A149] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Redshank (*Tringa totanus*) [A162] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Wetland and Waterbirds [A999]	Indirect hydrological Indirect air and land (collision risk)
North-West Irish Sea SPA (004236) Linear Distance to Proposed Development: approx. 5.4km NE	**SCI Species as per NPWS (2023)** • Red-throated Diver (*Gavia stellata*) • Great Northern Diver (*Gavia immer*) • Fulmar (Fulmarus glacialis) • Manx Shearwater (*Puffinus puffinus*) • Cormorant (Phalacrocorax carbo) • Shag (Phalacrocorax aristotelis) • Common Scoter (*Melanitta nigra*)	Indirect hydrological Indirect air and land (collision risk and ex-situ habitat loss)

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
	• Little Gull (*Larus minutus*) • Black-headed Gull (Chroicocephalus ridibundus) • Common Gull (*Larus canus*) • Lesser Black-backed Gull (*Larus fuscus*) • Herring Gull (*Larus argentatus*) • Great Black-backed Gull (*Larus marinus*) • Kittiwake (Rissa tridactyla) • Roseate Tern (*Sterna dougallii*) • Common Tern (*Sterna hirundo*) • Arctic Tern (Sterna paradisaea) • Little Tern (Sterna albifrons) • Guillemot (*Uria aalge*) • Razorbill (*Alca torda*) • Puffin (*Fratercula arctica*)	
North Bull Island SPA (004006) Linear Distance to Proposed Development: approx. 5.4km NE	**SCI Species as per NPWS (2015)** • Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Shelduck (*Tadorna tadorna*) [A048] • Teal (*Anas crecca*) [A052] • Pintail (*Anas acuta*) [A054] • Shoveler (*Anas clypeata*) [A056] • Oystercatcher (*Haematopus ostralegus*) [A130] • Golden Plover (*Pluvialis apricaria*) [A140] • Grey Plover (*Pluvialis squatarola*) [A141] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*) [A149] • Black-tailed Godwit (*Limosa limosa*) [A156] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Curlew (*Numenius arquata*) [A160] • Redshank (Tringa totanus) [A162] • Turnstone (*Arenaria interpres*) [A169]	Indirect hydrological Indirect air and land (collision risk)

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
	• Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Wetland and Waterbirds [A999]	
Dalkey Islands SPA [004172] Linear Distance to Proposed Development: approx. 5.4km SE	**SCI Species as per NPWS (2024)** • Roseate Tern *Sterna dougallii* [A192] • Common Tern *Sterna hirundo* [A193] • Arctic Tern *Sterna paradisaea* [A194]	Indirect air and land Indirect air and land (collision risk)

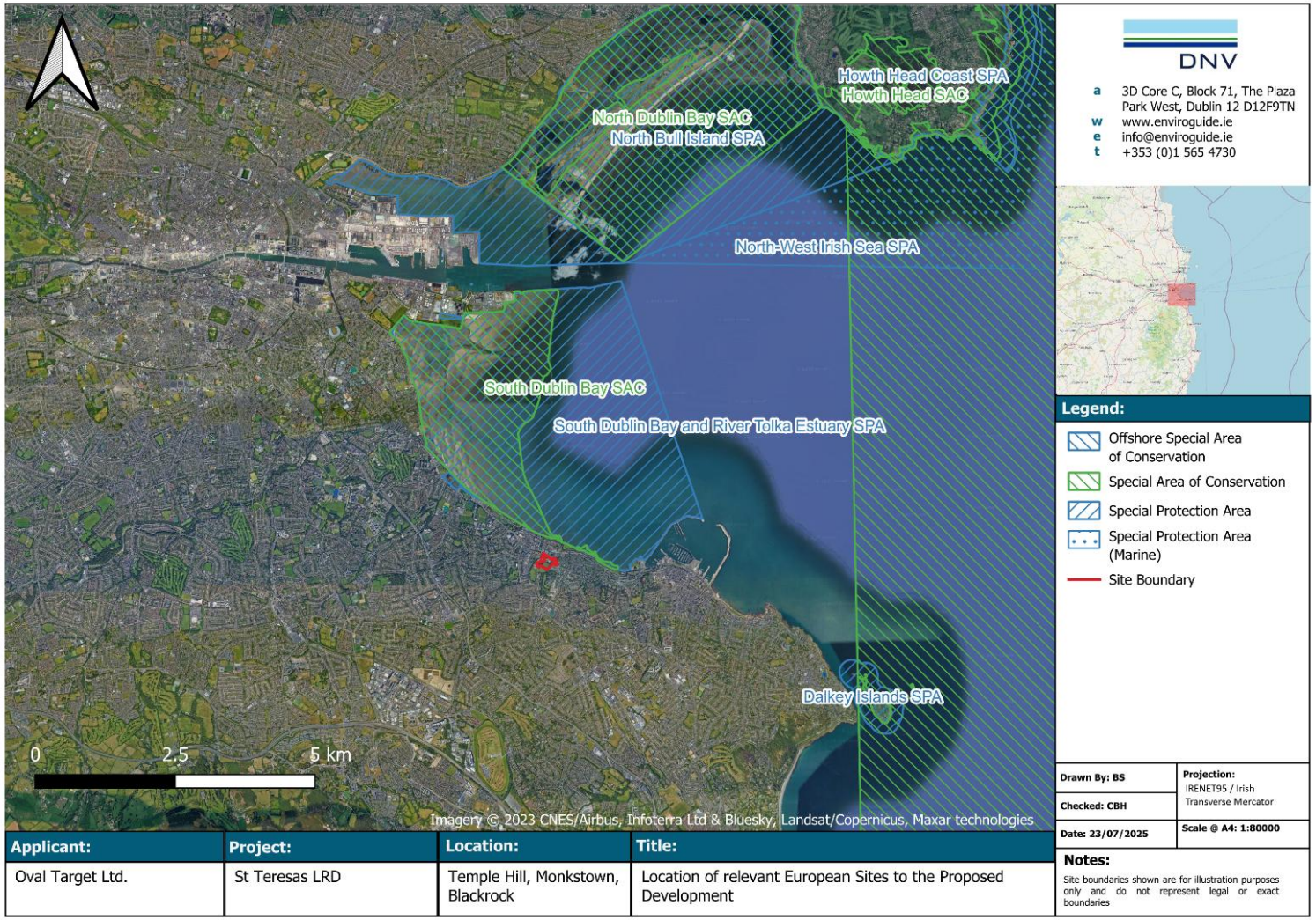

FIGURE 4. LOCATION OF EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT.

4.3.3.1 Rockabill to Dalkey Island SAC (003000)

The following descriptions of the Rockabill to Dalkey Island SAC (Site Code: 003000) are extracted from the Site Synopsis (NPWS, 2014, rev13) for the Site:

"The Rockabill to Dalkey Island SAC (003000) is a designated Special Area of Conservation located in the western Irish Sea, stretching approximately 40 km from Rockabill to Dalkey Island in a strip about 7 km wide. It encompasses a diverse range of marine habitats including sandy and muddy seabeds, reefs, sandbanks, and several islands such as Dalkey, Muglins, and Rockabill. The Site is protected under the EU Habitats Directive for its significant ecological features, notably Annex I habitat [1170] Reefs and Annex II species [1351] Harbour Porpoise (Phocoena phocoena). The reef habitats, rare along Ireland's eastern coast, support rich biodiversity both intertidally and subtidally, with species such as Fucus serratus, Laminaria hyperborea, and Echinus esculentus. The area is also a vital year-round habitat for Harbour Porpoise, with stable populations and frequent sightings of calves. Additionally, the SAC supports other marine mammals including Common and Grey Seals, Bottlenose Dolphins, and occasionally whales and other dolphin species. Dalkey Island serves as a key staging area for thousands of terns post-breeding, and the Site is important for various seabirds like Puffins, Guillemots, and Gannets".

4.3.3.2 South Dublin Bay SAC (000210)

The following descriptions of the South Dublin Bay SAC are extracted from the Site Synopsis (NPWS, 2015d) for the Site:

"This Site lies south of the River Liffey in Co. Dublin and extends from the South Wall to the west pier at Dun Laoghaire. It is an intertidal Site with extensive areas of sand and mudflats. The sediments are predominantly sands but grade to sandy muds near the shore at Merrion Gates. The main channel which drains the area is Cockle Lake.

The bed of Dward Eelgrass (Zostera noltii) found below Merrion Gates is the largest stand on the east coast. Green algae (Enteromorpha spp. and Ulva lactuca) are distributed throughout the area at a low density. Fucoid algae occur on the rocky shore in the Maretimo to Dún Laoghaire area. Species include Fucus spiralis, F. vesiculosus, F. serratus, Ascophyllum nodosum and Pelvetia canaliculata.

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

Lugworm (Arenicola marina), Cockles (Cerastoderma edule) and annelids and other bivalves are frequent throughout the Site. The small gastropod Hydrobia ulvae occurs on the muddy sands off Merrion Gates.

South Dublin Bay is an important Site for waterfowl. Although birds regularly commute between the south bay and the north bay, recent studies have shown that certain populations which occur in the south bay spend most of their time there. The principal species are Oystercatcher (1215), Ringed Plover (120), Sanderling (344), Dunlin (2628) and Redshank (356) (average winter peaks 1996/97 and 1997/98). Up to 100 Turnstones are usual in the south bay during winter. Brent Goose regularly occur in numbers of international importance (average peak 299). Bar-tailed Godwit (565), a species listed on Annex I of the E.U. Birds Directive, also occur.

Large numbers of gulls roost in South Dublin Bay, e.g. 4,500 Black-headed Gulls in February 1990; 500 Common Gulls in February 1991. It is also an important tern roost in the autumn, regularly holding 2000-

3000 terns including Roseate Terns, a species listed on Annex I of the E.U. Birds Directive. South Dublin Bay is largely protected as a Special Protection Area.

At low tide the inner parts of the south bay are used for amenity purposes. Bait digging is a regular activity on the sandy flats. At high tide some areas have windsurfing and jet-skiing. This Site is a fine example of a coastal system, with extensive sand and mudflats, and incipient dune formations. South Dublin Bay is also an internationally important bird Site".

4.3.3.3 North Dublin Bay SAC (000206)

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

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

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

Saltmarsh extends along the length of the landward side of the island. The edge of the marsh is marked by an eroding edge which varies from 20 cm to 60 cm high. The marsh can be zoned into different levels according to the vegetation types of present. On the lower marsh, Glasswort (Salicornia europaea), Common Saltmarsh-grass (Puccinellia maritima), Annual Sea-blite (Suaeda maritima) and Greater Sea-spurrey (Spergularia media) are the main species. Higher up in the middle marsh Sea Plantain (Plantago maritima), Sea Aster (Aster tripolium), Sea Arrowgrass (Triglochin maritima) and Thrift (Armeria maritima) appear. Above the mark of the normal high tide, species such as Common Scurvygrass (Cochlearia officinalis) and Sea Milkwort (Glaux maritima) are found, while on the extreme upper marsh, the rushes Juncus maritimus and J. gerardi are dominant. Towards the tip of the island, the saltmarsh grades naturally into fixed dune vegetation.

The habitat 'annual vegetation of drift lines' is found in places, along the length of Dollymount Strand, with species such as Sea Rocket (Cakile maritima), Oraches (Atriplex spp.) and Prickly Saltwort (Salsola kali).

The island shelters two intertidal lagoons which are divided by a solid causeway. The sediments of the lagoons are mainly sands with a small and varying mixture of silt and clay. The north lagoon has an area known as the "Salicornia flat", which is dominated by Salicornia dolichostachya, a pioneer glasswort species, and covers about 25 ha. Beaked Tasselweed (Ruppia maritima) occurs in this area, along with some Narrow-leaved Eelgrass (Zostera angustifolia). Dwarf Eelgrass (Z. noltii) also occurs in Sutton Creek. Common Cordgrass (Spartina anglica) occurs in places, but its growth is controlled by management. Green algal mats (Enteromorpha spp., Ulva lactuca) cover large areas of the flats during summer. These sediments have a rich macrofauna, with high densities of Lugworms (Arenicola marina) in parts of the north lagoon. Mussels (Mytilus edulis) occur in places, along with bivalves such as Cerastoderma edule, Macoma balthica and Scrobicularia plana. The small gastropod Hydrobia ulvae occurs in high densities in places, while the crustaceans Corophium volutator and Carcinus maenas are common. The sediments on the seaward side of North Bull Island are mostly sands. The Site extends below the low spring tide mark to include an area of the sublittoral zone.

Three rare plant species which are legally protected under the Flora (Protection) Order, 1999 have been recorded on the North Bull Island. These are Lesser Centaury (Centaurium pulchellum), Red Hemp-nettle (Galeopsis angustifolia) and Meadow Saxifrage (Saxifraga granulata). Two further species listed as threatened in the Red Data Book, Wild Clary/Sage (Salvia verbenaca) and Spring Vetch (Vicia lathyroides), have also been recorded. A rare liverwort, Petalophyllum ralfsii, was first recorded from the North Bull Island in 1874 and has recently been confirmed as still present. This species is of high conservation value as it is listed on Annex II of the E.U. Habitats Directive. The North Bull is the only known extant Site for the species in Ireland away from the western seaboard.

North Dublin Bay is of international importance for waterfowl. During the 1994/95 to 1996/97 period the following species occurred in internationally important numbers (figures are average maxima): Brent Goose 2,333; Knot 4,423; Bar-tailed Godwit 1,586. A further 14 species occurred in nationally important concentrations - Shelduck 1505; Wigeon 1,166; Teal 1,512; Pintail 334; Shoveler 239; Oystercatcher 2,190; Ringed Plover 346; Grey Plover 816; Sanderling 357; Dunlin 6,238; Black-tailed Godwit 156; Curlew 1,193; Turnstone 197 and Redshank 1,175. Some of these species frequent South Dublin Bay and the River Tolka Estuary for feeding and/or roosting purposes (mostly Brent Goose, Oystercatcher, Ringed Plover, Sanderling and Dunlin).

The tip of the North Bull Island is a traditional nesting Site for Little Tern. A high total of 88 pairs nested in 1987. However, nesting attempts have not been successful since the early 1990s. Ringed Plover, Shelduck, Mallard, Skylark, Meadow Pipit and Stonechat also nest. A well-known population of Irish Hare is resident on the island

The invertebrates of the North Bull Island have been studied, and the island has been shown to contain at least seven species of regional or national importance in Ireland (from the Orders Diptera, Hymenoptera and Hemiptera).

The main land uses of this Site are amenity activities and nature conservation. The North Bull Island is the main recreational beach in Co. Dublin and is used throughout the year. Much of the land surface of the island is taken up by two golf courses. Two separate Statutory Nature Reserves cover much of the island east of the Bull Wall and the surrounding intertidal flats. The Site is used regularly for educational purposes. North Bull Island has been designated a Special Protection Area under the E.U. Bird's Directive, and it is also a statutory Wildfowl Sanctuary, a Ramsar Convention Site, a Biogenetic Reserve, a Biosphere Reserve and a Special Area Amenity Order Site.

This Site is an excellent example of a coastal Site with all the main habitats represented. The Site holds good examples of nine habitats that are listed on Annex I of the E.U. Habitats Directive; one of these is listed with priority status. Several of the wintering bird species have populations of international importance, while some of the invertebrates are of national importance. The Site contains a numbers of rare and scarce plants including some which are legally protected. Its proximity to the capital city makes North Dublin Bay an excellent Site for educational studies and research".

4.3.3.4 South Dublin Bay and River Tolka Estuary SPA (004024)

The following descriptions of the South Dublin Bay and River Tolka Estuary SPA are extracted from the Site Synopsis (NPWS, 2015e) for the Site:

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

"In the south bay, the intertidal flats extend for almost 3 km at their widest. The sediments are predominantly well-aerated sands. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. The landward boundary is now almost entirely artificially embanked. There is a bed of Dwarf Eelgrass (Zostera noltii) below Merrion Gates which is the largest stand on the east coast. Green algae (Ulva spp.) are distributed throughout the area at a low density. The macroinvertebrate fauna is well-developed and is characterised by annelids such as Lugworm (Arenicola marina), Nephthys spp. and Sand Mason (Lanice conchilega), and bivalves, especially Cockle (Cerastoderma edule) and Baltic Tellin (Macoma balthica).

The small gastropod Spire Shell (Hydrobia ulvae) occurs on the muddy sands off Merrion Gates, along with the crustacean Corophium volutator. Sediments in the Tolka Estuary vary from soft thixotrophic muds with a high organic content in the inner estuary to exposed, well-aerated sands off the Bull Wall. The Site includes Booterstown Marsh, an enclosed area of saltmarsh and muds that is cut off from the sea by the Dublin/Wexford railway line, being linked only by a channel to the east, the Nutley stream. Sea water incursions into the marsh occur along this stream at high tide. An area of grassland at Poolbeg, north of Irishtown Nature Park, is also included in the Site."

"The South Dublin Bay and River Tolka Estuary SPA is of ornithological importance as it supports an internationally important population of Light-bellied Brent Goose and nationally important populations of a further nine wintering species. Furthermore, the Site supports a nationally important colony of breeding Common Tern and is an internationally important passage/staging Site for three tern species. It is of note that four of the species that regularly occur at this Site are listed on Annex I of the E.U. Birds Directive, i.e. Bar-tailed Godwit, Common Tern, Arctic Tern and Roseate Tern. Sandymount Strand/Tolka Estuary is also a Ramsar Convention Site."

4.3.3.5 North-west Irish Sea SPA (004236)

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

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

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

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

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

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

4.3.3.6 North Bull Island SPA (004006)

The following descriptions of the North Bull Island SPA are extracted from the Site Synopsis (NPWS,2015f) for the Site:

"This Site covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head."

"The North Bull Island SPA is of international importance for waterfowl on the basis that it regularly supports in excess of 20,000 waterfowl. The Site supports internationally important populations of three species, Light-bellied Brent Goose (1,548), Black-tailed Godwit (367) and Bar-tailed Godwit (1,529) - all figures are mean peaks for the five winters between 1995/96 and 1999/2000. The Site is one of the most important in the country for Light-bellied Brent Goose. A further 14 species have populations of national importance – Shelduck (1,259), Teal (953), Pintail (233), Shoveler (141), Oystercatcher (1,784), Grey Plover (517), Golden Plover (2,033), Knot (2,837), Sanderling (141), Dunlin (4,146), Curlew (937), Redshank (1,431), Turnstone (157) and Black-headed Gull (2,196). The populations of Pintail and Knot are of particular note as they comprise 14% and 10% respectively of the all-Ireland population totals."

The North Bull Island SPA is an excellent example of an estuarine complex and is one of the top Sites in Ireland for wintering waterfowl. It is of international importance on account of both the total number of waterfowl and the individual populations of Light-bellied Brent Goose, Black-tailed Godwit and Bar-tailed Godwit that use it. Also of significance is the regular presence of several species that are listed on Annex I of the E.U. Birds Directive, notably Golden Plover and Bar-tailed Godwit, but also Ruff and Short-eared Owl. North Bull Island is a Ramsar Convention Site, and part of the North Bull Island SPA is a Statutory Nature Reserve and a Wildfowl Sanctuary."

4.3.3.7 Wicklow Mountains SAC (002122)

The following descriptions of the Wicklow Mountains SAC (002122) are extracted from the Site Synopsis (NPWS, 2017) for the site:

> *"Wicklow Mountains SAC is a complex of upland areas in Counties Wicklow and Dublin, flanked by the Blessington reservoir to the west and Vartry reservoir in the east, Cruagh Mountain in the north and Lybagh Mountain in the south. The site supports a range of rare plant species. Parsley Fern (Cryptogramma crispa), Marsh Clubmoss (Lycopodiella inundata), Lanceolate Spleenwort (Asplenium billotii), Small-white Orchid (Pseudorchis albida) and Bog Orchid (Hammarbya paludosa) are all legally protected under the Flora (Protection) Order, 2015. Greater Broomrape*
>
> *(Orobanche rapum-genistae), Alpine Saw-wort and Alpine Lady's-mantle are listed in the Irish Red Data Book. The rare Myxomycete fungus Echinostelium colliculosum has been recorded from the Military Road. Mammals and birds which occur are typical of the uplands. Deer are abundant, mainly hybrids between Red and Sika Deer. Other mammals include Hare, Badger and Otter, the latter being a species listed on Annex II of the E.U. Habitats Directive. Pine Marten has recently been confirmed as occurring within the site. Among the birds, Meadow Pipit, Skylark, Raven and Red Grouse are resident throughout the site. Wheatear, Whinchat and the scarce Ring Ouzel are summer visitors. Wood Warbler and Redstarts are rare breeding species of the woodlands. Dipper and Grey Wagtail are typical riparian species. Merlin and Peregrine, both Annex I species of the E.U. Birds Directive, breed within the site. Recently, Goosander has become established as a breeding species."*

4.3.3.8 Dalkey Islands SPA (004172)

The following descriptions of the Dalkey Islands SPA are extracted from the Site Synopsis (NPWS,2015g) for the Site:

"The Site comprises Dalkey Island, Lamb Island and Maiden Rock, the intervening rocks and reefs, and the surrounding sea to a distance of 200 m. Dalkey Island, which is the largest in the group, lies c. 400 m off Sorrento Point on the Co. Dublin mainland from which it is separated by a deep channel. The island is low-lying, the highest point of which (c. 15 m) is marked by a Martello Tower. Soil cover consists mainly of a thin peaty layer, though in a few places there are boulder clay deposits. Vegetation cover is low-

growing and consists mainly of grasses. Dense patches of Bracken (Pteridium aquilinum) and Hogweed (Heracleum sphondylium) occur in places. Lamb Island lies to the north of Dalkey Island, and at low tide is connected by a line of rocks. It has a thin soil cover and some vegetation, mainly of grasses, Nettles (Urtica dioica) and Hogweed. Further north lies Maiden Rock, a bare angular granite rock up to 5 m high that is devoid of higher plant vegetation. This Site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Roseate Tern, Common Tern and Arctic Tern. Dalkey Islands SPA is both a breeding and a staging Site for Sterna terns. There is a good history of nesting by terns though success has been variable over the years. Common Tern is the most common species, usually outnumbering Arctic Tern by at least 3:1. Up to 1988, the range given for Common Tern was 15-53 pairs, and for Arctic Tern 'a few' pairs. Also, Roseate Tern attempted nesting in 1986, with 2 pairs recorded. A tern conservation scheme, co-ordinated by BirdWatch Ireland / National Parks and Wildlife Service, began in 1995, with wardening, nestbox deployment and monitoring being carried out. The ultimate aim was to attract Roseate Tern to breed. Numbers of terns increased in subsequent years, though numbers and breeding success is still variable between years. In 2003 62 pairs of Common Tern and 24 pairs of Arctic Tern were recorded. Of great significance is that Roseate Tern has returned, with 5 pairs recorded in 2003 and 11 pairs in 2004 - this is one of only three known Sites in the country for this rare species. The Site, along with other parts of south Dublin Bay, is used by the three tern species as a major post-breeding/pre-migration autumn roost area. The Site is linked to another important post-breeding/pre-migration autumn tern roost area in Dublin Bay. Birds are present from about late-July to September, with c. 2,000 terns, comprising individuals of all three species, recorded in 1998. The origin of the birds is likely to be the Dublin breeding Sites (Rockabill and Dublin Docks) though the numbers recorded suggests that birds from other Sites, perhaps outside the State, are also present. The Site also has breeding Great Black-backed Gull (7 pairs in 2001), Shelduck (1-2 pairs) and Oystercatcher (1-2 pairs). Herring Gull bred in large numbers in the past but is now very scarce (14 pairs recorded in 1999). The Site is known to be frequented in winter by Turnstone and Purple Sandpiper, but recent count data are not available. Dalkey Islands SPA is of particular importance as a post-breeding/pre-migration autumn roost area for Roseate Tern, Common Tern and Arctic Tern. The recent nesting by Roseate Tern is highly significant. All three tern species using the Site are listed on Annex I of the E.U. Birds Directive."

4.3.3.9 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the relevant European Site(s) are detailed in Table 4 below.

TABLE 4. QUALIFYING INTERESTS (QIS) / SPECIAL CONSERVATION INTERESTS (SCIS) AND THEIR CONSERVATION OBJECTIVES FOR THE RELEVANT EUROPEAN SITES. THE CONSERVATION STATUS OF EACH QI / SCI WAS SOURCED FROM THE RELEVANT STANDARD DATA FORM(S) (SOURCE: EEA (2025)), AND THE LATEST NATIONAL STATUS IS TAKEN FROM THE LATEST ARTICLE 17 REPORT (NPWS, 2019A & 2019B) AND BOCCI[4] RESPECTIVELY.

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
North Bull Island SPA (004006)			
A054 Pintail (*Anas acuta*)	Excellent	Amber	To maintain the favourable conservation condition of these species in North Bull Island SPA.
A056 Shoveler (*Anas clypeata*)	Excellent	Red	
A052 Teal (*Anas crecca*)	Excellent	Amber	

[4] Birds of Conservation Concern in Ireland (BOCCI) 2020-2026 (Gilbert, Stanbury & Lewis, 2021). The colours represent the species designation on the various BOCCI lists.

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
A050 Wigeon (*Anas Penelope*)	Excellent	Amber	
A053 Mallard (*Anas platyrhynchos*)	Excellent	Amber	
A169 Turnstone (*Arenaria interpres*)	Excellent	Amber	
A222 Short-eared Owl (*Asio flammeus*)	Good	Amber	
A046 Light-bellied brent goose (*Branta bernicla hrota*)	Excellent	Amber	
A144 Sanderling (*Calidris alba*)	Excellent	Green	
A149 Dunlin (*Calidris alpina*)	Excellent	Red	
A143 Knot (*Calidris canutus*)	Excellent	Red	
A147 Curlew Sandpiper (*Calidris ferruginea*)	Good	Red	
A145 Little Stint (*Calidris minuta*)	Good	Green	
A137 Ringed Plover (*Charadrius hiaticula*)	Excellent	Amber	
A130 Oystercatcher (*Haematopus ostralegus*)	Excellent	Red	
A182 Common Gull (*Larus canus*)	Excellent	Amber	
A179 Black-headed gull (*Chroicocephalus ridibundus*)	Excellent	Amber	
A157 Bar-tailed godwit (*Limosa lapponica*)	Excellent	Red	
A156 Black-tailed godwit (*Limosa limosa*)	Excellent	Red	

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
A069 Red-breasted Merganser (*Mergus serrator*)	Excellent	Amber	
A160 Curlew (*Numenius arquata*)	Excellent	Red	
A151 Ruff (*Philomachus pugnax*)	Good	Amber	
A140 Golden plover (*Pluvialis apricaria*)	Good	Red	
A141 Grey plover (*Pluvialis squatarola*)	Excellent	Red	
A048 Shelduck (*Tadorna tadorna*)	Excellent	Amber	
A161 Spotted Redshank (*Tringa erythropus*)	Good	Amber	
A164 Greenshank (*Tringa nebularia*)	Excellent	Green	
A162 Redshank (*Tringa totanus*)	Excellent	Red	
A999 Wetlands	No status available	N/A	To maintain the favourable conservation condition of the wetland habitat in North Bull Island SPA as a resource for the regularly occurring migratory waterbirds that utilise it.
North Dublin Bay SAC (000206)			
1140 Mudflats and sandflats not covered by seawater at low tide	Good	Inadequate	To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.
1210 Annual vegetation of drift lines	Good	Inadequate	To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.
1310 Salicornia and other annuals colonising mud and sand	Excellent	Favourable	

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
1320 *Spartina* swards	*Non-significant presence*	No status available	*No CO for this QI habitat has been published to date.*
1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Good	Inadequate	To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.
1410 Mediterranean salt meadows (*Juncetalia maritimi*)	Good	Inadequate	
2110 Embryonic shifting dunes	Excellent	Inadequate	To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.
2120 Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	Good	Inadequate	
2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)	Excellent	Bad	
2190 Humid dune slacks	Excellent	Inadequate	
1395 *Petalophyllum ralfsii* (petalwort)	Good	Favourable	To maintain the favourable conservation condition of this species in North Dublin Bay SAC.
North-West Irish Sea SPA (004236)			
A001 Red-throated Diver (*Gavia stellata*)	n/a	Amber[5]	To <u>maintain</u> the favourable conservation condition of these species in North-west Irish Sea SPA.
A003 Great Northern Diver (*Gavia immer*)	n/a	Amber	
A009 Fulmar (*Fulmarus glacialis*)	n/a	Amber	To <u>restore</u> the favourable conservation condition of this species in North-west Irish Sea SPA.
A013 Manx Shearwater (*Puffinus puffinus*)	n/a	Amber	To <u>maintain</u> the favourable conservation condition of this species in North-west Irish Sea SPA.
A017 Cormorant (*Phalacrocorax carbo*)	n/a	Amber	

[5] A standard Data Form is not yet available for the North-West Irish Sea SPA, and therefore Conservation Statuses for each SCI could not be obtained. Each SCI species' BoCCI status is therefore included for this SPA to give an indication of their Irish conservation status.

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
A018 Shag (*Phalacrocorax aristotelis*)	n/a	Amber	To restore the favourable conservation condition of these species in North-west Irish Sea SPA.
A065 Common Scoter (*Melanitta nigra*)	n/a	Red	To maintain the favourable conservation condition of these species in North-west Irish Sea SPA.
A177 Little Gull (*Larus minutus*)	n/a	Amber	
A179 Black-headed Gull (*Chroicocephalus ridibundus*)	n/a	Amber	
A182 Common Gull (*Larus canus*)	n/a	Amber	
A183 Lesser Black-backed Gull (*Larus fuscus*)	n/a	Amber	
A184 Herring Gull (*Larus argentatus*)	n/a	Amber	To restore the favourable conservation condition of this species in North-west Irish Sea SPA.
A187 Great Black-backed Gull (*Larus marinus*)	n/a	Green	To maintain the favourable conservation condition of this species in North-west Irish Sea SPA
A188 Kittiwake (*Rissa tridactyla*)	n/a	Red	To restore the favourable conservation condition of this species in North-west Irish Sea SPA.
A192 Roseate Tern (*Sterna dougallii*)	n/a	Amber	To maintain the favourable conservation condition of these species in North-west Irish Sea SPA
A193 Common Tern (*Sterna hirundo*)	n/a	Amber	
A194 Arctic Tern (*Sterna paradisaea*)	n/a	Amber	
A195 Little Tern (*Sterna albifrons*)	n/a	Amber	
A199 Guillemot (*Uria aalge*)	n/a	Amber	
A200 Razorbill (*Alca torda*)	n/a	Red	
A204 Puffin (*Fratercula arctica*)	n/a	Red	To restore the favourable conservation condition of this species in North-west Irish Sea SPA.
South Dublin Bay SAC (000210)			

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
1140 Mudflats and sandflats not covered by seawater at low tide	Good	Inadequate	To maintain the favourable conservation condition of this habitat in South Dublin Bay SAC.
1210 Annual vegetation of drift lines	Good	Inadequate	*No CO for these QI habitats has been published to date.*
1310 Salicornia and other annuals colonising mud and sand	Good	Favourable	
2110 Embryonic shifting dunes	Good	Inadequate	
South Dublin Bay and River Tolka Estuary SPA (0040224)			
A169 Turnstone (*Arenaria interpres*)	Good	Amber	To maintain the favourable conservation condition of these species in South Dublin Bay and River Tolka Estuary SPA.
A046 Light-bellied Brent Goose *(Branta bernicla hrota)*	Excellent	Amber	
A144 Sanderling *(Calidris alba)*	Excellent	Green	
A149 Dunlin *(Calidris alpina)*	Good	Red	
A143 Knot *(Calidris canutus)*	Good	Red	
A137 Ringed Plover *(Charadrius hiaticula)*	Good	Amber	
A130 Oystercatcher *(Haematopus ostralegus)*	Good	Red	
A182 Common Gull (*Larus canus*)	Good	Amber	
A176 Mediterranean Gull (*Larus melanocephalus*)	Excellent	Amber	
A179 Black-headed Gull *(Chroicocephalus ridibundus)*	Good	Amber	

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
A157 Bar-tailed Godwit *(Limosa lapponica)*	Good	Red	
A069 Red-breasted Merganser (*Mergus serrator*)	Good	Red	
A160 Curlew (*Numenius arquata*)	Good	Red	
A017 Great Cormorant (*Phalacrocorax carbo*)	Good	Amber	
A141 Grey Plover *(Pluvialis squatarola)*	Good	Red	
A005 Great Crested Grebe (*Podiceps cristatus*)	Good	Amber	
A192 Roseate Tern *(Sterna dougallii)*	Excellent	Amber	
A193 Common Tern *(Sterna hirundo)*	Excellent	Amber	
A194 Arctic Tern *(Sterna paradisaea)*	Excellent	Amber	
A162 Redshank *(Tringa totanus)*	Good	Red	
A999 Wetlands	No status available	N/A	To maintain the favourable conservation condition of the wetland habitat in South Dublin Bay and River Tolka Estuary SPA as a resource for the regularly occurring migratory waterbirds that utilise it.
Dalkey Islands SPA (004172)			
A192 Roseate Tern *(Sterna dougallii)*	Good	Amber	To restore the favourable conservation condition of the SCI species in Dalkey Islands SPA.
A193 Common Tern *(Sterna hirundo)*	Good	Amber	
A194 Arctic Tern *(Sterna paradisaea)*	Good	Amber	

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
Wicklow Mountains SAC (002122)			
Lutra lutra (Otter) [1355][6]	Good	protected under Annex II and Annex IV of the Habitats Directive	To maintain the favourable conservation condition of Otter in Wicklow Mountains SAC.

[6] Only QI include as the only one screened in for this SAC.

4.4 Assessment of Likely Significant Effects

The following sections discuss the potential for likely significant effects on the relevant European Site(s), taking into consideration the QIs, SCIs and SSCOs (where available), and assesses whether the Proposed Development has the capacity to adversely affect the integrity of European Sites via the pathways identified as significant in Section 4.3. Furthermore, due consideration shall be given to species not formally identified but which may be present within the relevant European Site(s) and adversely effected by the Proposed Development, provided that those potential impacts are likely to affect the conservation objectives of the designated Site. The potential for significant effects that may arise from the Proposed Development was considered through the use of key indicators as detailed in section 3.6.

4.4.1 Habitat Loss and Alteration

As discussed in section 4.3 the project is not located within any European Sites and therefore there will be no direct loss or alteration of habitats as a result of the Proposed Amendments.

However, foul waters from the Site will undergo treatment at Ringsend WwTP before being discharged to Dublin Bay (within **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** and **South Dublin Bay and River Tolka Estuary SPA (004024)**). The indirect hydrological pathway identified in Section 4.3 has been deemed as significant thus far due the possibility that, during events such as heavy floods, a fault at the plant or a disturbance which may prevent the WwTP from treating foul waters from the Proposed Development could lead to uncontrolled release of such foul waters into Dublin Bay. Potential impacts of such an event include nutrient overloading of the waters within and around these European Sites which could ultimately pose a threat to the integrity and health of QI habitats, or habitats utilised by a variety of SCI species including shellfish, fish, bird or marine mammal populations.

However, as discussed in detail in Section 4.4.6 below, according to the most recent assessments of Ringsend WwTP performance and capacity, “in the do-nothing scenario, 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.

Accounting for the above, and the fact that significant remaining plant capacity at Ringsend WwTP, it can be concluded that there will be no overloading and/or release of untreated sewage into the Dublin Bay as a result of the Proposed Amendments. Therefore, there will be no loss or alteration of downstream QI habitat of **North Dublin Bay SAC (000206)** or **South Dublin Bay SAC (000210)** or habitat to SCI species of **North Bull Island SPA (004006), North-West Irish Sea SPA (004236)** or **South Dublin Bay and River Tolka Estuary SPA (004024)** via the identified indirect hydrological pathway.

The second pathway identified as significant in Section 4.3.2 above which could cause habitat loss or alteration is the indirect air and land pathway between the Proposed Development and **North-West Irish Sea SPA (004236)**. Although loss or alteration of ex-situ foraging habitat was ruled out, the Development may cause the loss of breeding habitat for Herring gull *(Larus argentatus)* which were found to be breeding atop St. Teresas House. As such, the potential for significant ex-situ breeding habitat loss as a result of the Proposed Amendments **cannot be ruled out at this stage.**

No other pathways between the Proposed Development and any European Sites, which have the potential cause habitat loss and alteration were identified.

4.4.2 Habitat/ Species Fragmentation

As outlined in Section 4.4.1, due to the remaining organic and hydraulic capacity within Ringsend WwTP, it can be concluded that no downstream habitat or species fragmentation will occur within as a result of overloading of Ringsend WwTP and release of untreated sewage into **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** or **South Dublin Bay and River Tolka Estuary SPA (004024)**.

However, the potential for habitat loss/alteration as a result of the Proposed Amendments could not be ruled out (in Section 4.4.1 above) on ex-situ breeding habitat for SCI species of the **North-West Irish Sea SPA (004236)**. Accounting for this, in the absence of suitable mitigation measures, the potential habitat/species fragmentation **cannot be ruled out at this stage.**

No other pathways between the Proposed Development and any European Sites, which have the potential cause habitat or species fragmentation were identified.

4.4.3 Changes in Water Quality and Resource

Direct Impacts

Given the proximity of the Site to both the Carysfort-Maretimo Stream and **South Dublin Bay SAC (000210)** and **South Dublin Bay and River Tolka Estuary SPA (004024)**, a possible direct hydrological and hydrogeological pathway between the Site of the Proposed Amendments and same exists, and, while the amendments to the Proposed Development consist of revisions to, and omissions of, proposed blocks, and all surface water discharge plans are to remain largely the same, adopting the precautionary principal, the potential for significant impact on the aforementioned Sites **cannot be ruled out at this stage.**

Indirect Impacts

With regards to operation phase foul water, accounting for the fact that there is significant remaining organic and hydraulic treatment capacity within Ringsend WwTP which will not be exceeded by the Proposed Amendments it can be concluded that there will be no reduction in water quality within **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** or **South Dublin Bay and River Tolka Estuary SPA (004024)** as a result of the Proposed Amendments. This is discussed in further detail in Section 4.4.6 below.

4.4.4 Disturbance and Displacement of Species

Given the points relating to the sufficient capacities of Ringsend WwTP above, there will be no disturbance or displacement of SCI species within **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** or **South Dublin Bay and River Tolka Estuary SPA (004024)** as a result of the indirect hydrological pathway identified from the Proposed Development.

The Proposed Development is not considered to have the capacity to cause any likely significant effects in terms of disturbance or displacement of any species within any European site. However, it is noted that the Proposed Development, whose surface waters will discharge to the Carysfort–Maretimo Stream, has the potential to support populations of the Eurasian otter, a species listed under Annex IV of the EU Habitats Directive. However, there are no records for otter presence in this stream, and this stream is not designated as a European site i.e., it is not part of the Natura 2000 network and is not classified as a Special Area of Conservation (SAC) or Special Protection Area (SPA)

Furthermore, while the Site is located >22km away from **Wicklow Mountains SAC (002122)** there is the potential for otter, which is an SCI species of this SAC to commute / forage in the Carysfort–Maretimo Stream, owing to home ranges for this species of up to 10-20km (and up to 40km) in some instances according to The Vincent Trust (n.d.) and Marnett et al (2011).

Upon further inspection, however, it was determined that a hydrological link between the Carysfort-Maretimo Stream and Wicklow Mountains SAC does not exist, as there is no hydrological connection between the two.

Additionally, the Development itself does not involve any direct works within the riparian corridor, as the stream is located 0.025km from the Site boundary. In addition, the Carysfort–Maretimo (brewery stream) is a highly modified, urban stream, which has been culverted for most of its channel; This stream originates in the Dublin Mountains foothills, flows through Sandyford and Stillorgan, and feeds Carysfort Park Lake. It then continues downstream, becoming the Carysfort–Maretimo Stream as it reaches Blackrock. Most

of its course is now covered or channelled underground, remediation and flood relief works have widened culverts, and numerous sections remain culverted beneath urban areas.

~~Accounting for the above, there will be no direct disturbance to potential otter habitat.~~

~~During both the construction and operational phases, standard best practice measures will be implemented to manage surface water and prevent pollution. However, significant water quality impacts arising from the Proposed Development have not been ruled out in Section4.4.3 above. Accounting for this, and, despite the absence of direct interaction with the river, the non-designated status of the Carysfort–Maretimo Stream, and the application of best practice construction and operational controls, it cannot be concluded that the Proposed Development will not result in any adverse effects on otters or their habitat. As such, potential disturbance/displacement impacts arising from the Proposed Amendments on Otter, **cannot be ruled out at this stage.**~~

As a result, No hydrological or ecological connectivity is identified between the Site and the Wicklow Mountains SAC. The Carysfort–Maretimo Stream is highly modified and largely culverted, and is therefore considered unsuitable to support otter. Accordingly, the potential for direct or indirect disturbance to otter is excluded, and **can be ruled out at this stage.**

Notwithstanding this, a precautionary approach is adopted in respect of water quality. As outlined in Section 4.4.3, standard best practice measures will be implemented during construction and operation to control surface water runoff and prevent pollution. These measures will ensure that silt, hydrocarbons, and other contaminants do not enter the watercourse, thereby avoiding adverse effects on water quality.

An indirect land and air pathway was identified between the Proposed Amendments, which include alterations to overall unit numbers and building heights, and **South Dublin Bay and River Tolka Estuary SPA (004024)**, **Dalkey Islands SPA (004172)**, **North Bull Island SPA (004006)** and **North-West Irish Sea SPA (004236)** which has the potential to cause collision risk impacts to the SCI bird species associated with these SPAs. A collision risk could consequently cause disturbance and displacement of these SCI species, therefore the impact of same is included in the following section – Avoidance by Design.

4.4.4.1 Avoidance By Design (Embedded Measures)

Embedded measures incorporated as a component of the design of the Proposed Amendments which will have a secondary effect of preventing significant effects on European sites are described below. These include the application of standardised international best practice measures which are to be included as part of the overall design of the Operational Phase of the proposal.

4.4.4.2 Building Specifications to Reduce Collision Risk Impact

The following specifications are embedded into the design of the project which serve to further reduce collision risk impact on SCI species which may be using the wider Templehill area for commuting/foraging.

Building Appearance

Whilst the design of the facades of the buildings do include windows, as shown on the elevation drawings prepared by O' Mahony Pike Architects (2025) for the Proposed Amendment Development no large continuous surfaces of glass are proposed. Rather the overall façades of the proposed buildings are well broken up, with a varied material composition interspersing any reflective areas.

These architectural design features provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. This overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Amendment is negligible. These architectural design features are part of the overall design of the Proposed Development and are not considered to represent specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard. As a result, it is noted that birds are not deemed to be at any particular risk of collisions with the proposed buildings at the Site.

Accounting for the above, based on the physical appearance of the Proposed structures and the nature of their location, it is deemed that birds including any 'at-risk' species, do not have the potential to be significantly impacted by the Proposed Development in terms of collisions and the risk owing to the building appearance is therefore deemed to be imperceptible in the absence of any mitigation.

Building Height

With respect to Special Conservation Interest (SCI) species for SPAs within the zone of influence of the Proposed Amendments which regularly use or travel over inland areas, the relevant SCI species of collision risk concern include light bellied brent goose, gull species and wader species. In Rathdown, these species navigate this urban environment daily

To put some context on some of their avoidance capabilities, in a different setting and for use in collision risk modelling for onshore wind turbines, an avoidance rate of 99.5% is applied for large gull species and an avoidance rate of 99.2% is applied for small gull species (Furness, 2019), which essentially means that 99.5% and 99.2% of gull flights[7], respectively, will avoid collision with a moving turbine. For Curlew, the avoidance rate applied is 98% (SNH, 2018).

The risk of collision is even less with a static, clearly detectable building. The proposed buildings consist of glazing, including glass facades at the top, which are broken up with a varied material composition interspersing any reflective areas. While the presence of the Proposed Amendment might alter flight patterns of bird species slightly to avoid the proposed building structures the risk of collision is extremely low.

The Proposed Amendment entails the construction of relatively low-level residential buildings ranging in height from 3-8 storeys in height, and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be imperceptible [Migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020) (Figure 5).

It is considered that birds that fly over the Site to commute between feeding grounds at various locations would fly lower than this, however, once the proposed structures are made of visible materials i.e., not entirely comprised of continuous reflective materials such as glass, the birds would simply fly around or over them.

As such, flightline/collision risk impacts on SCI species of the nearby **South Dublin Bay and River Tolka Estuary SPA (004024)**, **Dalkey Islands SPA (004172)**, **North Bull Island SPA (004006)** and **North-West Irish Sea SPA (004236** as a result of the Proposed Amendments are not expected to occur and have been **ruled out at this stage.**

[7] Within the collision risk zone

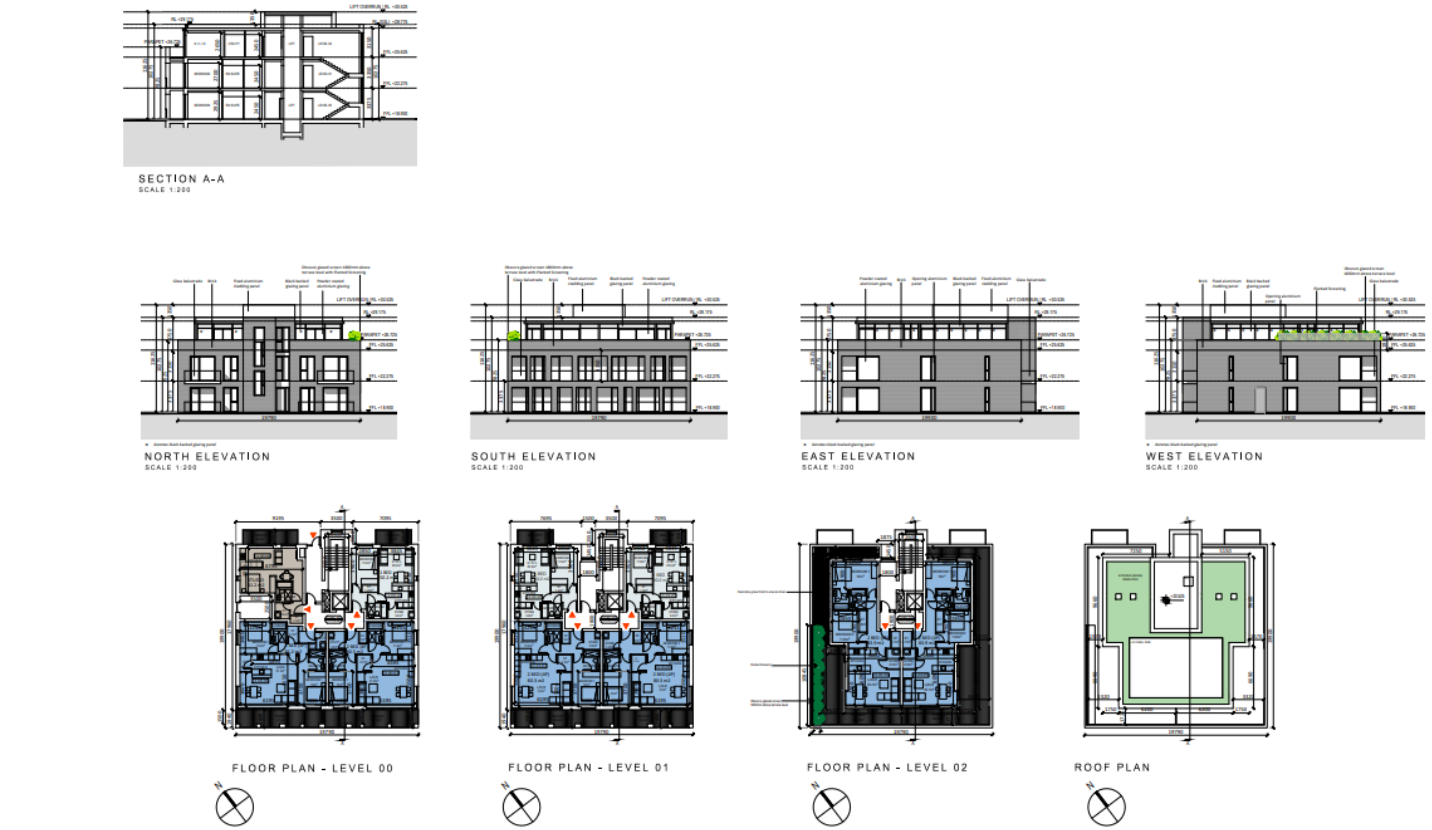

FIGURE 5: SHOWING ELEVATIONS OF C1 BLOCK (OMP, 2025).

4.4.5 Changes in Population Density

As outlined in Sections 4.41 to 4.44 above, due to the remaining capacity of the Ringsend WwTP, the potential for a pollution event in **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236)** or **South Dublin Bay and River Tolka Estuary SPA (004024)** is negligible.

As per the previous sections above, potential impacts to SCI species of **South Dublin Bay and River Tolka Estuary SPA (004024)**, **Dalkey Islands SPA (004172)**, **North Bull Island SPA (004006)** and **North-West Irish Sea SPA (004236)** arising as a result of Proposed Amendments, in terms of collision risk, have ~~not~~ been ruled out. As such, ~~adopting a precautionary approach,~~ the potential for population density impacts to SCI species due to ex-situ habitat loss or disturbance to **North Bull Island SPA (004006), North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North-West Irish Sea SPA (004236), Dalkey Islands SPA (004172)** or **South Dublin Bay and River Tolka Estuary SPA (004024)** arising from the Proposed Amendments, **can~~not~~ be ruled out at this stage.**

4.4.6 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. The first phase of upgrade works to Ringsend WwTP was completed in December 2021, which increased the capacity of the facility by 400,000 PE. These works, together with the further works permitted in 2019 will ultimately 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 biochemical oxygen demand (BOD), suspended soils, ammonia, dissolved inorganic nitrogen (DIN) and molybdate reactive phosphate (MRP). An Environmental Impact Assessment Report (EIAR) was submitted by Irish Water as part of that 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." Indeed, the results of the marine macroinvertebrate studies undertaken for the EIAR show that "the Inner Tolka Basin is host to macroinvertebrate communities as rich (if not richer) than those found in the north Dublin Bay and south Dublin Bay mudflats and sandflats".

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 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, no impacts on SCI species of the nearby SPA are expected to occur as a result of the identified indirect hydrological pathway. Importantly, this conclusion is not dependent upon any future works to be undertaken at Ringsend. Thus, in the absence of any upgrading works, significant effects to European Sites are not likely to arise.

4.4.7 Potential for In-combination Effects

Although the Proposed Development is not considered to have the capacity to cause significant effects on any European Sites alone, it is important to consider the potential for cumulative effects with other plans and/or projects. The following sections outline existing granted or pending planning permissions in the vicinity of the Proposed Development and assess the potential for adverse in-combination effects on any European Sites.

4.4.7.1 Existing Planning Permissions

A search of planning applications located within a 300m radius of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie) and Dún Laoghaire-Rathdown online planning database (DLRCC). Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European Sites. Long-term developments granted outside of this time period were also considered where applicable.

It is noted that the majority of the few developments within the vicinity of the Site of the Proposed Development are applications granted for 300m. The larger developments in the vicinity of the Proposed Development are outlined in Table 5.

TABLE 5. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 300 M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
D25A/0073/WEB	**Dun Laoghaire-Rathdown County Council**	**Grant permission (21/03/2025)**	**Frascati Centre, Frascati Road, Blackrock, Co.Dublin**
Development Description Subdivision and associated part change of use of Anchor Retail Unit 1 (located over ground and first floor levels) and back of house at second floor level to provide 2 no. units, comprising Unit D2 for Retail use at ground floor level with an overall GFA of 546 sq.m, and Unit D3. **Potential for In-combination effects** As this application refers to a change of use, no construction/alterations are proposed, and therefore potential for in-combination impacts are not foreseen.			
ABP-318088-24 **REF8923**	**Dun Laoghaire-Rathdown County Council, and ABP**	**Grant permission (19/11/2024) exempted development**	**Temple Road/Newtown Avenue to junction of Sandycove Avenue**
Development Description Living Streets: Coastal Mobility Route (Blackrock to Sandycove). **Potential for In-combination effects** Exempted development; no in-combination effects anticipated.			

Planning Reference	Planning Authority	Status	Location
ABP-321765-25 **D24A/0484/WEB**	**Dun Laoghaire-Rathdown County Council, and ABP**	**Grant permission (16/07/2025)**	**Old Dun Leary Road, Cumberland Street, Longford Place and Dun Leary Hill, Dun Laoghaire, Co. Dublin, A96 N208**
Development Description Construction of a five to eight storey development in 2 blocks and the change of use and refurbishment of existing three-storey 'Dun Leary House' (a protected structure) to provide for 88 residential units, a retail unit and all associated site works. **Potential for In-combination effects** Potential for cumulative impacts during construction (noise, dust, traffic) when considered alongside other large-scale residential projects in Blackrock/Dún Laoghaire. However, with standard mitigation (dust suppression, noise control, traffic management), significant effects are unlikely.			
D20A/0567	**Dun Laoghaire-Rathdown County Council**	**Grant permission (18/06/2023)**	**13-15, Rock Hill, Blackrock, Co. Dublin, A94V2NO**
Development Description Demolition of the existing two-storey building and the construction of a 3-7 storey mixed use building (8 no. 2-bedroom apartments and 1 no. commercial unit) **Potential for In-combination effects** Similar to above; potential short-term cumulative impacts during construction phase, but not significant, and ruled out with mitigation.			
ABP-313509-24	**Dun Laoghaire-Rathdown County Council, and ABP**	**Grant permission (27/03/2024)**	**Lands across Dublin**
Development Description BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme. **Potential for In-combination effects** Could overlap with construction traffic and access constraints for other developments. However, coordination of traffic management plan (CEMP and Traffic report) provided for the proposed development, ensures significant cumulative effects are avoided.			
ABP-318247-24 **LRD22A/0930**	**Dun Laoghaire-Rathdown County Council, ABP**	**Grant permission (09/04/2024)**	**Dalguise House, Monkstown Road, Monkstown, County Dublin, A94 D7D1**
Development Description Large Scale Residential Development (LRD) - permission for 491 no. residential units, a childcare facility, restaurant/café and all associated site development works. Dalguise House is a protected structure - RPS no. 870. A Natura Impact and an EIAR accompanies application. **Potential for In-combination effects**			

Planning Reference	Planning Authority	Status	Location
Large-scale project with potential for cumulative habitat disturbance and traffic impacts when combined with other residential schemes. Natura Impact Statement has been prepared for both with no significant effects predicted with mitigation that is being provided.			
PL06D.308900 **D19A/0908**	**Dun Laoghaire-Rathdown County Council**	**Grant permission (05/07/2023)**	**Merrion Road/Rock Road (R118), Booterstown, Blackrock**
Development Description 1 no. vehicular access to Merrion Road/Rock Road to serve a new recreational and interpretive centre, open landscaped space, biodiversity proposals, associated site and infrastructural works **Potential for In-combination effects** Positive biodiversity measures reduce risk of negative cumulative effects. No significant in-combination impacts are expected.			
ABP-314429-23 **D21A/0996**	**Dun Laoghaire-Rathdown County Council, ABP**	**Grant permission (30/05/2023)**	**Frascati Centre, Frascati Road, Blackrock, Co. Dubin**
Development Description A Phase 3 residential development of 98 no. apartments and all associated site works. **Potential for In-combination effects** Potential cumulative effects with other Frascati projects and Blackrock residential schemes during construction. Mitigation measures (dust, noise, traffic) will prevent significant impacts.			
ABP-314653-22 **D22A/0469**	**Dun Laoghaire-Rathdown County Council, ABP**	**Grant permission (24/08/2022)**	**Blackrock House (a protected structure RPS No. 234), 28 Newtown Avenue, Blackrock, Co. Dublin (and also Maretimo Gardens East)**
Development Description The modification, refurbishment and reconfiguration of Blackrock House to provide for a total of 21 no. apartments within Blackrock House, the construction of 2 no. new residential blocks on site to provide for a total of 42 no. units in the overall subject site, landscaped open space, widened footpath on Maretimo Gardens East and all associated services. **Potential for In-combination effects** Owing to the small scale and nature of the works; Appropriate Assessment screening concluded no significant effects alone or in combination. No further mitigation required beyond standard measures. However, mitigation measures provided by the proposed development at St. Teresa's will further ensure no potential for in-combination effects.			
ABP-313569-22 **D21A/0958**	**Dun Laoghaire-Rathdown County Council, ABP**	**Grant permission (20/04/2022)**	**c.0.49 ha site on the former Europa Garage Site, Newtown Avenue**
Development Description			

Planning Reference	Planning Authority	Status	Location
The development will consist of the construction of a residential development providing 91 residential units (GFA c.10,829 sq.m including **Potential for In-combination effects** Similar to the above, Appropriate Assessment screening concluded no significant effects alone or in combination. No further mitigation required beyond standard measures. However, mitigation measures provided by the proposed development at St. Teresa's will further ensure no potential for in-combination effects.			
D21A/0413	**Dun Laoghaire-Rathdown County Council**	**Grant permission 29/07/2021**	**Carraig Tennis Club, Rockfield Park, Blackrock, Co. Dublin**
Development Description The installation of 4 no. new 10 metre steel columns and LED floodlights, the replacement of 2 no. existing 8 metre columns with existing floodlights and all associated site works and laying of column foundations and electrical cabling. **Potential for In-combination effects** Very minor works; as such there is negligible potential for in-combination effects.			
ABP-308946-21	**Dun Laoghaire-Rathdown County Council, ABP**	**Grant permission (15/04/2021)**	**Newtownpark Avenue, Blackrock, Co. Dublin**
Development Description Demolition of a single storey shed, construction of 140 no. apartments and all associated site works. **Potential for In-combination effects** Similar to the above, Appropriate Assessment screening concluded no significant effects alone or in combination. No further mitigation required beyond standard measures. However, mitigation measures provided by the proposed development at St. Teresa's will further ensure no potential for in-combination effects.			
D20A/0557	**Dun Laoghaire-Rathdown County Council**	**Grant permission (24/02/2021)**	**Site at Zurich House, Frascati Road, Blackrock, Co. Dublin**
Development Description The development will consist of an increase in floor area of the existing office building by providing lateral (to the north-east and south-west) and vertical extensions comprising: the lateral extension (from lower ground floor to fourth floor level) by 1,765 sq m and the vertical extension (provision of a new set back, part fifth floor level) by 620 sq m; replacement of the north-east facade fronting George's Place and partial replacement of all other facades; and internal modifications and reconfigurations. The proposed development will result in an increase in office floor area from 3,790 sq m to 6,175 sq m. The development also includes: the reconfiguration and extension of the existing car park resulting in the provision of 27 No. car parking spaces. **Potential for In-combination effects** Urban setting; cumulative traffic impacts possible but will be mitigated for in the form of standard mitigation. A such, potential for in-combination effects are not foreseen.			

Planning Reference	Planning Authority	Status	Location
ABP-308046-20	**Dun Laoghaire-Rathdown County Council, ABP**	**Grant and refuse permission (16/12/2020)**	**/Frascati Shopping Centre, Frascati Road, Blackrock, Co. Dublin/**
Development Description The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the existing / permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units. **Potential for In-combination effects** Potential overlap with other Frascati works; cumulative effects mitigated through coordinated best practice construction management.			
D20A/0086	**Dun Laoghaire-Rathdown County Council**	**Grant permission (30/06/2020)**	**Former Irish Crystal Site fronting onto, Brookfield Terrace, Carysfort Avenue, Blackrock, Co. Dublin**
Development Description Permission for development. The proposed development will consist of the following: (i) The demolition of the existing warehouse building and outbuilding on the Site.; (ii) The construction of a single storey pre delivery inspection workshop with associated wash bay for vehicles (both structures will have green roofs); (iii) The provision of 66 no. car parking storage spaces; (iv) Alterations/upgrades to the existing entrance onto Brookfield Terrace; (v) The proposed development will also include a stormtech attenuation tank located at the centre of the Site underground; (vi) All ancillary and associated Site development works. A Natura Impact Statement has been prepared in respect of the proposed development and has been submitted with the planning application. **Potential for In-combination effects** The proposed development Site is within a mixed-use area containing both commercial and residential uses. Following the implementation of the mitigation measures outlined, the construction and presence of this development would not be deemed to have a significant impact. No significant impacts are likely on the natural 2000 Sites alone in combination with other plans and projects based on the implementation of standard construction phase mitigation measures.			
D22A/0469	**Dun Laoghaire-Rathdown County Council**	**Grant permission & Refuse permission (24/08/2022)**	**Blackrock House (a protected structure RPS No. 234), 28 Newtown Avenue, Blackrock, Co. Dublin and also Maretimo Gardens East**
Development Description Permission for development, comprising the refurbishment of the existing structure and the construction of 2 no. apartments buildings. The application Site includes the protected structures of 'Blackrock house' and the 'Entrance Gates', both Protected Structures under RPS Ref: No. 234. The proposed development will consist of: A) The modification, refurbishment and reconfiguration of Blackrock House, a protected structure, to provide for a total of 21 apartments within Blackrock House, including the proposed repair and restoration works to the existing Blackrock House to provide for an additional 4 apartment providing 21 in total (an increase from 17 no. existing) to comprise 3 no. three bedroom, 9 no. two bedroom and 9 no. one bedroom units. B) The construction of 2 no. new residential blocks on Site; comprising (Block A) a three-storey over lower ground floor block to the west of Blackrock House (consisting of 8 no. two bedroom apartment units), and a two storey block (Block B) located to the north of Blackrock House, (consisting of 12 no. one bedroom apartment units and 1 no. 2 bedroom unit and accessed from Maretimo gardens East, with associated car parking (13 no. spaces), to provide for a total of 42 no. units in the overall subject			

Planning Reference	Planning Authority	Status	Location
Site. c) The works to Blackrock House include an improved layout with the insertion of a new door on the western elevation at ground floor, reinstatement of traditional windows, removal of 1980's concrete bridge connecting to the front of the facade, replacement of utility services and fire upgrade works (to include removal of internal walls (modern and historic) to facilitate new internal apartment arrangement. The proposed development includes landscaped open space, widened footpath on Maretimo Gardens East, all associated services, including connection to existing drainage, green roofs to Blocks A and B, 54 cycle parking spaces, reconfiguration of the parking area for 13 car parking spaces accessed from Newtown Avenue, 1 car sharing space which is accessed from Maretimo Gardens east and bin storage. **Potential for In-combination effects** Appropriate Assessment Screening The proposed development has been screened for AA (report on file), and it has been determined that the development proposed would not significantly impact upon a Natura 2000 Site.			
D21A/0958	**Dun Laoghaire-Rathdown County Council**	**Grant permission (16/11/2023)**	**c.0.49 ha Site on the former Europa Garage Site, Newtown Avenue, Blackrock, Co Dublin**
Development Description Permission for development. The development will consist of the construction of a residential development providing 91 residential units (GFA c.10,829 sq.m including basement) of 1-4 storeys together with residential accommodation in attic floor over (2 units) in two Pavilion style buildings. The apartment units will consist of 49 no. 1-bed units (c.49-61 sq.m), 38 no. 2-bed units (c.66-94 sq.m) and 4 no. 3-bed units (c.96-108 sq.m) all with associated private balconies/terraces to the north/south/east/west elevations. Block A (1-4 storeys) shall provide for 47 no. apartment units (total GFA c.3,627 sq.m); Block B (2-4 storeys plus attic floor) shall comprise of 44 no. apartments (total GFA c3,998 sq.m). Basement level (c.3,204 sqm) shall provide for 73 no. car parking spaces (including visitor, GO-Car and mobility impaired); 194 no. bicycle spaces; plant areas; switch room; bin storage area; and surface water attenuation tank. The development proposal shall also provide for c.1,162 sq.m of communal open space and 302 sq.m of public open space; basement ramp adjacent to north-western boundary; new pedestrian access off Newtown Avenue to north; 50 no. bicycle parking spaces at grade; bin holding area; ESB substation; structural works to existing western boundary wall; amendments to a portion of existing southern boundary wall reinstating it to a height of +21.380m OD between the front building line of number 7 Craigmore Gardens and the rear boundary of the property; all other ancillary Site development works, and Site services required to facilitate the proposed development. **Potential for In-combination effects** This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to any SAC or SPA. This screening is based upon best available scientific knowledge. There is no reasonable scientific doubt with regard to this finding.			
ABP30894620	**Dun Laoghaire-Rathdown County Council**	**Grant permission (15/04/2021)**	**1.46ha on lands within the curtilage of 'Cluain Mhuire', (a protected structure RPS. ref. no. 776), Newtownpark Avenue, Blackrock, Co. Dublin**
Development Description The development will consist of the demolition of the existing c. 26sqm single storey shed on Site and construction of a residential development comprising; 140 no. apartment and duplex units (total gross floor area 14,383sqm) across 5 no. 2-5 storey buildings (Blocks C&D over basement) comprising 1 no. studio apartment, 59 no. 1 bedroom apartments, 71 no. 2 bedroom apartments and 9 no. 3 bedroom apartments (along with a 'linked' single storey amenity building) as follows: Block A (4 storeys) comprises 32 no. apartments [balconies on all elevations] consisting			

Planning Reference	Planning Authority	Status	Location
of 17 no. 1 bedroom, and 15 no. 2 bedroom apartments; Block B (5 storeys) comprises 40 no. apartments [balconies on all elevations] consisting of 21 no. 1 bedroom and 19 no. 2 bedroom apartments; Block C (4 - 5 storeys over basement) comprises 31 no. apartments [balconies on all elevations] consisting of 1 no. studio apartment, 8 no. 1 bedroom, 17 no. 2 bedroom and 5 no. 3 bedroom apartments; Block D (4 storeys over basement) comprises 28 no. apartments [balconies on all elevations] consisting of 9 no. 1 bedroom, 15 no. 2 bedroom and 4 no. 3 bedroom apartments; Block E (2 - 3 storeys) comprises 9 no. duplex units [balconies on north and south elevations] consisting of 4 no. 1 bedroom units and 5 no. 2 bedroom units; Communal Amenity Space (889sqm) and public open space (1680 sqm) totalling 2,569sqm is provided throughout the Site including internal amenity space/concierge area totalling 175sqm within a single story 'linked' building between Blocks A and B; Vehicular access to the development will be from the upgraded existing access from Newtownpark Avenue (including demolition of c.10m of the existing boundary wall to facilitate the widening of the Site entrance) and will extend throughout the Site linking to the basement car parking level (as well as provision of future potential links to [the boundary with] the lands to the west and to Cluain Mhuire); • Provision of 97 no. car parking spaces (29 no. surface car parking and 68 no. basement car parking); 226 no. cycle parking spaces (56 no. surface cycle parking space and 170 no. basement car parking) and 6 no. motorcycle spaces; • Provision of a single storey ESB substation, hard and soft landscaped areas, public lighting, attenuation, service connections, bin stores, and a new pedestrian crossing on Newtownpark Avenue and all ancillary Site development works. **Potential for In-combination effects** In conclusion, upon the examination, analysis and evaluation of the relevant information including, in particular, the nature of the Proposed Development and the likelihood of significant effects on any Natura 2000 Site, in addition to considering possible in-combination effects, and applying the precautionary principles, it is concluded by the authors of this report that, on the basis of objective information; the possibility may be excluded that the Proposed Development will have a significant effect on any of the Natura 2000 Sites listed below: • South Dublin Bay SAC [000210] • North Dublin Bay SAC [000206] • Rockabill to Dalkey Island SAC [003000] • Wicklow Mountains SAC [002122] • Howth Head SAC [000202] • Knocksink Wood SAC [000725] • Glenasmole Valley SAC [001209] • Baldoyle Bay SAC [000199] • Ballyman Glen SAC [000713] • Ireland's Eye SAC [002193] • Bray Head SAC [000714] • South Dublin Bay and River Tolka Estuary SPA [004024] • North Bull Island SPA [004006] • Dalkey Islands SPA [004172] • Wicklow Mountains SPA [004040] • Baldoyle Bay SPA [004016] • Howth Head Coast SPA [004113] • Ireland's Eye SPA [004117] Therefore, it is concluded that the possibility of any significant effects on any European Sites arising from the Proposed Development, whether considered on its own or in combination with the effects of other plans or projects, can be excluded beyond a reasonable scientific doubt.			
PC/IC/01/23	**Dun Laoghaire-Rathdown County Council**	**Approve**	**Blackrock Village, Co. Dublin**
Development Description Living Streets Blackrock Village is a public realm improvement project which aims to enhance the attractiveness, liveability, connectivity and economic vibrancy of Blackrock Village. Building on the temporary measures implemented during the COVID restrictions of summer 2020 on Blackrock Main Street, the plan will move the village from a temporary layout to a high-quality permanent design. The scheme is informed by consultation with local representative businesses and resident groups and independent evaluation of the temporary measures by TU Dublin. It is also consistent with the Blackrock Local Area Plan (LAP) developed in 2015, which was informed by extensive public consultation. **Potential for In-combination effects** It can be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European Sites, that the proposed works,			

Planning Reference	Planning Authority	Status	Location
individually or in combination with other plans and projects, would not be likely to have a significant effect on any European Sites designated under the Habitats Directive and Birds Directive. As a result, an Appropriate Assessment is not required, and a Natura Impact Statement shall not be prepared in respect of the proposed works.			

4.4.7.2 Relevant Policies and Plans

The local policies and plans detailed in section 2.2 above were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA, and where potential for likely significant effects has been identified (e.g., in the case of the Dún Laoghaire-Rathdown County Development Plan), an NIS has been prepared which identifies appropriate mitigation. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development. The Dún Laoghaire-Rathdown County Development Plan 2022-2028 has directly addressed the protection of European Sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European Sites.

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

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
South Dublin Bay SAC (000210)	No	No	No	None	Yes	None	**Yes**
Wicklow Mountains SAC (002122)	No	No	No	None	None	None	No
North Dublin Bay SAC (000206)	No	No	No	None	None	None	No
Rockabill to Dalkey Island SAC (003000)	No	No	No	None	None	None	No
SPA							
South Dublin & River Tolka Estuary SPA (004024)	No	No	No	None	None	None	**Yes**
Northwest Irish Sea SPA (004236)	Yes	Yes	Yes	None	None	None	**Yes**
North Bull Island SPA (004006)	No	No	No	None	None	None	No
Dalkey Islands SPA (004172)	No	No	No	None	None	None	No

5 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at St Teresas Lands, Temple Hill, Monkstown, Blackrock, Co. Dublin has been assessed taking into account:

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

Upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Amendments will have a significant effect on any of the European Sites listed below:

- North Dublin Bay SAC (000206).
- Rockabill to Dalkey Island SAC (003000).
- Wicklow Mountains SAC (002122).
- Dalkey Islands SPA (004172).
- North Bull Island SPA (004006).

However, upon examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may not be excluded** that the Proposed Amendments will have a significant effect on any of the European Sites listed below:

- South Dublin Bay SAC (000210).
- South Dublin Bay and River Tolka Estuary SPA (004024).
- North-West Irish Sea SPA (004236).
- ~~Wicklow Mountains SAC (002122).~~

In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European Site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European Sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded in light of the above listed European Sites' conservation objectives. Thus, there is a requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of **an NIS is required.**

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