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

Memorandum – Further Information Response - Ecology

Oval Target Ltd.
10 Ely Place, Dublin 2, Ireland

Report no.: 001, Rev. 002
Date: 28/05/2026

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1 INTRODUCTION

DNV was commissioned by Brock McClure, on behalf of Oval Target Ltd., to prepare this Memorandum Report in response to the Request for Further Information (FI) issued on 25th March 2026 (Ref: LRD26A/0051/WEB). The FI relates to Proposed Amendments to the permitted (2019) residential development (Ref: D19A/0398) at St. Teresa's, Temple Road, Monkstown, Blackrock, Co. Dublin (hereafter referred to as the "Proposed Development" or the "Site").

This Memorandum addresses the FI items relevant to ecology and biodiversity, providing the additional information and clarifications required to support the application.

2 REQUEST FOR FURTHER INFORMATION AND RESPONSE

No.	Item Request	Response
Chapter 6: Biodiversity of the EIAR		
1	A revised EIAR Chapter 6: Biodiversity is required to address the following points below and all matters raised by the Biodiversity Officer:	Revised EIAR Chapter 6: Biodiversity has been provided to address the points below and all matters raised by the Biodiversity Officer, as requested. Please read this memo in conjunction with updates to the revised biodiversity chapter (including the accompanying updated non-technical summary and appendices), AA Screening, and NIS Reports. Which fully address all FI items set out in this memo report.
1(A)	The revised EIAR Biodiversity Chapter must clearly outline any changes in the impact of the amended design changes and any changes in the findings of previous ecological documentation (submitted under the parent application) including any proposed changes in mitigation measures. Justification for any proposed changes to mitigation must be included to ensure continuity.	The revised EIAR Biodiversity Chapter has been updated to clearly identify any changes arising from the amended design, including impacts, ecological findings, and mitigation measures relative to the parent application. A detailed comparison is provided in Appendix 6-4, which presents a side-by-side assessment of the parent EcIA and the current EIAR. This confirms that, while design amendments have been made, there is no material change in the type or significance of ecological impacts. Updated surveys have refined the baseline (e.g. breeding birds and badger activity), but do not alter the valuation of Key Ecological Receptors or the overall assessment conclusions. Mitigation measures have been carried forward and, where appropriate, strengthened (e.g. enhanced lighting design, habitat preservation area, and updated badger protection measures). These changes improve ecological outcomes and reflect current best practice. No mitigation has been reduced or removed.

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		Accordingly, the findings of the parent EcIA remain valid, and residual effects remain neutral to slight at the local level, with no significant adverse effects on designated sites or ecological receptors.
1(B)	Inclusion of the Woodland Management Plan in the revised EIAR biodiversity Chapter is required.	The Woodland Management Plan (WMP) has been incorporated into the revised EIAR Biodiversity Chapter as requested (it has been included as Appendix 6-6 and referred to in relevant sections -sections 6.10.5.5 and 6.10.6.9). The Chapter has been updated to clearly reference the WMP and summarise its key measures, including woodland protection, management, enhancement, and monitoring provisions. The full Woodland Management Plan is included as an Appendix (6-6) to the EIAR, and its measures are integrated into the overall ecological mitigation and management strategy for the Proposed Development. Cross-references have been provided within the Biodiversity Chapter to ensure clarity and continuity between the assessment and the prescribed management measures. This approach ensures that the protection and long-term management of the retained woodland is fully embedded within the EIAR and forms part of the committed mitigation framework for the Proposed Development.
1(C)	Potential Impacts to non-EU designated sites are not assessed in the chapter due to them having been 'assessed and mitigated for in the accompanying AA Screening and NIS reports by proxy'. Potential impacts to these designated sites should be assessed separately in the EIAR Biodiversity Chapter. The applicant is asked to complete a separate assessment of potential impacts to these non-EU designated sites within the EIAR biodiversity chapter.	Potential impacts to non-EU designated sites were assessed in the AAS and NIS by proxy originally to reduce unnecessary repetition, however, the EIAR biodiversity chapter has now been revised to include assessment of non-EU designated sites as requested. Please see Section 6.4.10 of the biodiversity chapter.
1(D)	The results of the bat static detector survey deployed at St. Teresa's House are not provided. The applicant is asked to provide the results of this bat static	Bat activity at St. Teresa's House was assessed using a static detector deployed as part of the 2025 survey programme. The results of the wider static detector surveys are presented within the EIAR, which recorded 532 bat

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	detector survey. Details of weather conditions during deployment should also be provided.	passes (SM01) and 988 bat passes (SM02), dominated by *Pipistrellus pipistrellus* (common pipistrelle) and *Pipistrellus pygmaeus* (soprano pipistrelle). The static detector deployed at St. Teresa's House did not record evidence of roosting activity, with results indicating no significant bat activity associated with the building. In relation to the provision of raw detector data, it is noted that static bat surveys generate large volumes of data, including significant background noise recordings, which are not typically appended to EIAR documentation. Notwithstanding this, and to address the request, a review of the static detector summary output data confirms that the detector deployed at St. Teresa's House was operational throughout the survey period, however no recordings were triggered (0 files recorded and 0 files scrubbed), indicating an absence of bat activity at this location during deployment. An extract of the static data summary output, along with the weather conditions for the survey period, has been included as an appendix to the revised EIAR (Appendix 6-5). All data were reviewed and analysed by a suitably qualified ecologist in accordance with best practice. The survey effort undertaken is considered sufficient to characterise bat usage of the structure, and the findings support the conclusion that St. Teresa's House does not support a bat roost.
1(E)	Bat emergence surveys should be carried out in the appropriate season by a bat specialist and results updated to address limitations outlined in the EIAR.	Bat emergence surveys have been carried out in the appropriate season (2026) as requested and results of same have been included in the revised EIAR to address limitations in the 2025 survey data. In summation, no bats were recorded emerging or entering the St. Teresas House (and extension) building or PRF-M trees on Site, indicating these features are not being used by roosting bats. Please refer to Section 6.2.9 for survey methodologies,

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		Section 6.4.12.2 for survey results and evaluation, and Section 6.10 for mitigations. Please note, as the 2026 emergence survey results determined no bats were roosting within the buildings or PRF-M trees on Site, no changes to baseline were observed, and additional mitigations were not required.
1(F)	In section 6.4.102 the habitat Dry Meadows and Grassy Verges (GS20 is said to be of 'local importance (higher value)' due to it being locally infrequent. However, in Section 6.4.12, this habitat is said to be of 'local importance'. The applicant is asked to confirm the ecological value of the Dry Meadows and Grassy Verges habitat and provide reasoning for the evaluation. The applicant is asked to complete an assessment of potential effects to this habitat if deemed a Key Ecological Receptor.	The Applicant acknowledges the inconsistency identified within the EIAR Biodiversity Chapter regarding the evaluation of the habitat Dry Meadows and Grassy Verges (GS2). Upon review, it is confirmed that this habitat should be classified as being of Local Importance (Lower Value). This revised evaluation is based on the following: • The habitat present on site is largely semi-improved and influenced by historical management, with limited structural or species diversity. • The species assemblage recorded is typical of common, widespread grassland communities in an urban/suburban context, with no evidence of Annex I habitat types or notable/protected plant species. • While the habitat is locally present across the wider area, it does not exhibit characteristics of higher ecological value such as high botanical diversity, presence of indicator species, or strong ecological function beyond general amenity and low-level foraging use. • As such, it does not meet the criteria for Key Ecological Receptor (KER) status under CIEEM guidelines. Accordingly, the reference in Section 6.4.102 identifying this habitat as being of "Local Importance (Higher Value)" is superseded by this clarification and the assessment provided in Section 6.4.12.

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1(G)	Assessment of impacts to otter are not assessed further due to potential impacts to otter being assessed in the AA Screening and NIS Reports. The applicant is asked to complete a separate assessment of potential impacts to otter in order to assess potential impacts to non-QI otter.	The Applicant confirms that potential impacts on otter were previously considered within the EIAR through assessment of hydrological pathways (refer Sections 6.5.1 and 6.5.4.6.2), and in detail within the associated AA Screening and Natura Impact Statement (NIS) Reports. This approach avoided duplication, with impacts to otter (including those associated with European sites) assessed by proxy via the relevant pathways. In response to this Further Information request, the EIAR Biodiversity Chapter has been updated to include an expanded and dedicated assessment within the aquatic ecology section of the biodiversity chapter (see Section 6.4.11.6.2), which explicitly considers otter alongside fish and other aquatic receptors. This updated assessment includes consideration of non-Qualifying Interest (non-QI) otter, and provides a clear evaluation of potential impacts in accordance with EcIA methodology. The assessment confirms that there is no suitable holt or resting habitat within the Site or the nearby Carysfort-Maretimo Stream, owing to the heavily modified and culverted nature of said Stream, and that the potential for impacts is limited to indirect effects via the receiving water environment. With the implementation of standard best practice construction controls (including water quality protection measures), no significant adverse impacts on otter are predicted, including non-QI individuals.
1(H)	The applicant is asked to provide a sperate 'Badger Report'. This report should include: (i) information in relation to the number and location of sett entrances, (ii) (ii) the status of the setts on site (active or inactive, main or annex),	The Applicant confirms that all information relating to badgers within the Site has been comprehensively assessed and is presented within the revised EIAR Biodiversity Chapter (Section 6.5.4.4). This includes details on: • The location and number of badger setts and associated entrances identified within the woodland;

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	(iii) (iii) all proposed works in relation to badger setts, all relevant mitigation in relation to badger. The report should clarify the extent of the woodland habitat to be preserved and whether setts/sett entrances are protected under the proposed Habitat Preservation Areas (iv) any consultation/ correspondence with NPWS on this matter should also be included.	• The recorded usage of setts, including camera trap survey data confirming intermittent use by a minimum of two individuals; and • The current status of badger activity within the Site, based on survey findings and monitoring undertaken. The report also confirms that the woodland area, which contains all identified badger setts, is to be retained in full within a designated Habitat Preservation Area. All known sett entrances are located within this area and are therefore protected as part of the proposed development. No direct impacts to badger setts, including destruction or permanent closure, are proposed. Given that the proposed design avoids direct impacts on setts and retains suitable habitat in situ, further intrusive surveys to determine detailed sett classification (e.g. main vs annex) are not considered necessary. The mitigation strategy has been developed on a precautionary basis, ensuring that all setts are protected and buffered regardless of activity status. Additional survey effort would not alter the proposed mitigation measures or design approach. With regard to consultation, the report includes details of any engagement with the relevant authorities, where undertaken, and any ongoing consultation with the National Parks and Wildlife Service (NPWS) and the DLRCC Biodiversity Officer will continue as required to ensure appropriate protection of badgers throughout the construction and operational phases.
1(l)	The revised EIAR and badger report should explore alternative options to the destruction or closure of badgers setts in consultation with NPWS and the Local Authority Biodiversity Officer, avoidance of impacts and setts should be assessed in detail. Proposed buffer zones should be clearly outlined and justified.	The Applicant confirms that the revised EIAR Biodiversity Chapter has considered the avoidance of impacts on badger setts as a primary design and mitigation objective. No destruction or permanent closure of badger setts forms part of the current application proposals. As such, the requirement to assess alternative options

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		to sett closure is not applicable. Instead, the design and mitigation strategy has been developed in consultation with best practice guidance and is centred on the avoidance of direct impacts and the retention of badger habitat and setts in situ. The EIAR sets out a range of robust avoidance and protection measures, including: • The designation of a Habitat Preservation Area, incorporating the woodland and all identified badger setts; • The implementation of protective fencing and defined stand-off distances to prevent disturbance to setts during construction; • The maintenance of habitat connectivity, including retained commuting and foraging routes through the site and links to adjacent green spaces; and • A programme of ecological monitoring and supervision throughout the construction phase. Proposed buffer zones around badger setts have been clearly defined within the EIAR and Woodland Management Plan and are considered appropriate to the scale and nature of the development. These buffers are designed to minimise disturbance from construction activities and operational use, while allowing for the continued use of the woodland by badgers. The approach taken reflects the mitigation hierarchy, whereby avoidance has been prioritised over mitigation or compensation. In this context, and given that no sett closure is proposed, the current design represents the least impactful and most appropriate solution in ecological terms.

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1(J)	It is not clear if the additional planting (number of trees to be planted, area of native woodland planting) will offset the biodiversity loss expected as a result of site clearance and tree removal. The applicant is asked to provide the length of treelines and hedgerows to be removed, and area of Broadleaved Woodland, Scattered trees and parkland, and Scrub to be cleared, and the total number of trees to be felled as part of the proposed development. The applicant is also asked to provide the total number of trees to be planted, and area of native woodland planting proposed as part of the development.	Tree and vegetation losses associated with the proposed development are detailed in the Arboricultural Report (The Tree File Ltd, 2026) and include the removal of 86 individual trees, approximately 296 m of treelines/hedgerows, and c. 2,117 m² of woodland/tree groups, resulting in an estimated total vegetated area loss of c. 4,591 m². The proposed development incorporates significant replacement planting and habitat measures, including approximately 254 new trees, retention of c. 3,911 m² of existing canopy, provision of a Habitat Preservation Area (c. 1,000 m²), and native woodland planting (c. 215 m²), in addition to extensive understorey and biodiversity planting. While full replacement of canopy cover is not feasible within the site, the proposed landscape strategy focuses on delivering enhanced biodiversity value, including improved habitat diversity, structure, and connectivity. Accordingly, the planting proposals are considered to provide a robust and appropriate offset to the identified losses, consistent with ecological best practice.
1(K)	Potential impacts to badger, hedgehog and pygmy shrew relate to disturbance, direct mortality during vegetation clearance, entrapment within construction materials. Potential habitat loss for these species is not assessed. Given the proposed removal of woodland and scrub habitat, the applicant is asked to carry out an assessment of potential loss of habitat to badger, hedgehog and pygmy shrew. The applicant is asked to provide relevant mitigation, if required.	The Applicant confirms that the revised EIAR Biodiversity Chapter has been updated to include an assessment of potential habitat loss for badger, hedgehog, and pygmy shrew, as requested (refer to Section 6.6.1.3.3 and 6.10.5.4.). The assessment identifies that the proposed development will result in the partial loss of grassland and scrub habitats used by these species; however, these habitats are considered to be common and of low ecological value within the wider urban context. The retention of higher-value woodland habitat within the designated Habitat Preservation Area, together with the proximity of

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		Rockfield Park to the south, ensures that suitable alternative habitat is available locally and that ecological connectivity is maintained. The magnitude of habitat loss is therefore assessed as low, and the resulting effect is slight and not significant at a local level. Mitigation measures have been outlined within the Biodiversity Chapter and include: • Retention and protection of woodland habitats; • Maintenance of ecological connectivity within the Site and to adjacent green spaces; • Pre-clearance checks and staged vegetation removal; and • Incorporation of mammal-friendly design measures. The Biodiversity Chapter also confirms that, during the operational phase, the implementation of the landscape plan will provide replacement and enhanced habitat opportunities, ensuring continued use of the Site by terrestrial mammals over the long term. Accordingly, no significant adverse effects on badger, hedgehog, or pygmy shrew are predicted, and the conclusions of the EIAR remain unchanged.
1(L)	The EIAR notes that swift and swallow were recorded on site, clarification is required as to whether buildings on site were surveyed for swift/swallow nests and updated mitigation should be included if required.	Breeding Bird Surveys (BBS) undertaken as part of the EIAR (refer to Section 6.5.4.3.2) recorded both swift and swallow utilising the Site for foraging only, with no evidence of nesting or breeding behaviour identified within any buildings or structures on site. Accordingly, no buildings were identified as supporting active nests of swift or swallow, and no direct impacts to nesting sites are predicted as a result of the proposed development.

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		Notwithstanding this, the design incorporates enhancement measures in the form of integrated swift boxes, which will provide suitable nesting opportunities for this species post-development and contribute positively to local biodiversity. On this basis, no additional mitigation is required, and the findings of the EIAR remain unchanged.
1(M)	Detailed mitigation measures for the protection of the Carysfort-Maretimo stream (i.e. from dust, surface water run off etc.) must be included in the revised EIAR Biodiversity Chapter.	The Applicant confirms that the revised EIAR Biodiversity Chapter has been updated to provide detailed mitigation measures for the protection of the Carysfort–Maretimo Stream. Section 6.5.2.6.1.1 identifies the potential hydrological pathways between the Site and the Carysfort–Maretimo Stream. Mitigation measures have been incorporated through both the Construction Environmental Management Plan (CEMP) and the Sustainable Drainage Systems (SuDS) design, as outlined in Sections 6.10.1.2 and 6.10.1.3. In response to this Further Information request, these sections have been expanded to include explicit, detailed measures, rather than relying on cross-referencing. This includes: <u>Construction phase measures (Section 6.10.4.1):</u> • Implementation of best practice pollution prevention measures (e.g. bunded fuel storage, spill response procedures); • Installation of silt control measures (e.g. silt fencing, sediment traps) to prevent sediment mobilisation; • Controlled storage and handling of materials to minimise risk of contamination;

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		• Management of construction runoff to prevent direct discharge of untreated water. Dust prevention and suppression (Section 6.10.4.3): • Use of water suppression and site management measures to prevent dust deposition into the drainage network and downstream receiving waters. Operational phase measures (SuDS): • Attenuation and treatment of surface water runoff through SuDS features, ensuring that runoff is managed and treated prior to discharge; • Maintenance of green infrastructure to reduce runoff volumes and improve water quality. These measures ensure that no sediment, nutrients, or pollutants will enter the drainage network or downstream watercourses, including the Carysfort–Maretimo Stream. Accordingly, with the implementation of these embedded and detailed mitigation measures, there will be no deterioration in water quality, and no significant adverse effects on the stream are predicted.
1(N)	Further details on the assessment of potential collision risk should be included in the revised EIAR to provide clarification on how flight pathways were ruled out for different species groups (i.e. wintering birds, breeding birds etc.).	The revised EIAR Biodiversity Chapter includes an assessment of potential bird collision risk (see 6.10.1.1), which has been addressed through a design-led approach and embedded mitigation measures, rather than through detailed flight path modelling. As outlined in Section 6.5.4.3.2 of the EIAR, the bird assemblage recorded on site during surveys comprises predominantly common breeding woodland and garden species, with swift and swallow recorded foraging only. No evidence

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		was recorded of wintering bird aggregations, high-risk collision-sensitive species, or species dependent on defined flight corridors or migratory pathways within or over the site. Given the absence of notable flight lines, migratory routes, or high-sensitivity receptor species, the requirement for detailed flight path analysis or collision modelling is not considered necessary or proportionate. Collision risk has been appropriately addressed through: • Embedded design measures, including building layout, massing, and façade treatments; • Consideration of lighting design, reducing attraction/disorientation of birds; and • Assessment within the Appropriate Assessment / Natura Impact Statement, which concluded that there is no pathway for significant effects on European sites or associated bird species. On this basis, the risk of collision for both breeding and wintering bird species is considered to be low, and the level of assessment undertaken is proportionate to the ecological sensitivities identified. The conclusions of the EIAR in relation to collision risk remain unchanged.
1(O)	Section 6.6.1.3.1 states that presence of roosting bats within the site cannot be ruled out. However, potential impacts to bats do not include potential noise disturbance to roosting bats during the construction or operational phases of the proposed development. The applicant is asked to carry out an assessment of potential noise disturbance to roosting bats during both construction and operational phases. The applicant is asked to provide relevant mitigation, if required.	Bat emergence surveys have been carried out in the appropriate season (2026) as requested and results of same have been included in the revised EIAR to address limitations in the 2025 survey data. In summation, no bats were recorded emerging or entering the St. Teresas House (and extension) building or PRF-M trees on Site, indicating these features are not being used by roosting bats. Please refer to Section 6.2.9 for survey methodologies, Section 6.4.12.2 for survey results and evaluation, and Section 6.10 for mitigations. Please note, as the 2026 emergence survey results determined no

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		bats were roosting within the buildings or PRF-M trees on Site, no changes to baseline were observed, and additional mitigations for potential disturbance to roosting bats during the construction and operational phase of the proposed development were therefore not required. Despite this, the current Biodiversity Chapter 6 of the EIAR provides mitigations for construction phase noise and lighting, as well as operation phase lighting impacts on a precautionary basis for bats and other non-volant mammal species which are using the Site (see Section 6.10 for mitigations).
1(P)	In section 6.10.4.4, the use of protective tree fencing is proposed to protect canopy and root of trees to be retained. It is not clear if hedgehog will be able to access the retained hedgerow/ treelines once fencing is in place. The applicant is asked to clarify if fencing of retained hedgerows and treelines will prevent access and movement of fauna such as hedgehog between the proposed development and habitats outside of the development site.	The Applicant confirms that the installation of protective fencing for retained hedgerows and treelines, as outlined in Section 6.10.4.4, will not prevent the movement of fauna, including hedgehogs, between habitats within and adjacent to the Site. Tree protection fencing will be installed in accordance with BS5837:2012, however, it will be implemented in a manner that maintains ecological permeability. In particular: • Fencing will be raised slightly above ground level (typically 100-150 mm clearance) where practicable, to allow the free movement of small mammals such as hedgehogs beneath the fence line; • Alternatively, intermittent ground-level gaps will be incorporated where continuous clearance is not feasible, ensuring connectivity is maintained; • The fencing design will avoid continuous sealed barriers at ground level within ecological corridors and along retained habitat edges. In addition, the overall site layout and landscape design already incorporate mammal-friendly permeability measures, including:

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		• Hedgehog access points (min. 130 mm × 130 mm openings) within boundary walls and fencing; • Retention of continuous vegetated corridors through hedgerows, treelines, and woodland areas; and • A Habitat Preservation Area, ensuring connectivity between retained habitats on-site and adjoining green spaces. These combined measures ensure that tree protection fencing functions solely as a temporary construction safeguard, without creating a barrier to wildlife movement. This specification for ecologically permeable tree protection fencing has been included in the revised EIAR Biodiversity Chapter and associated construction documentation.
AAS and NIS		
3(A)	In the 'Background' Section of the Introduction chapter, Wicklow Mountains SAC 002122 is not included in the list of European Sites 'screened in' in the AA Screening Report. In addition, in Section 5, it states 'As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the QIs, SCIs and on the integrity and extent of South Dublin Bay SAC [0002101, South Dublin Bay and River Tolka Estuary SPA [004024] or North-West Irish Sea SPA [004236]' - Wicklow Mountains SAC has not been included. The applicant is asked to clarify which European Sites have been screened in and assessed, noting that there are inconsistencies with regard to reference to specific European Sites throughout.	A typographical oversight was corrected to ensure the Wicklow Mountains SAC 002122 is consistently referenced throughout the AAS. The European Sites which have been **screened in** during the AA Screening and assessed in the NIS include: • South Dublin Bay SAC [000210]. • South Dublin Bay and River Tolka Estuary SPA [004024]. • North-West Irish Sea SPA [004236]. Please note that the Wicklow Mountains SAC 002122 has therefore not been screened in during the AA Screening process, and has been excluded from the NIS. Please refer to both reports which have been updated accordingly to correct this oversight. Ultimately, the Carysfort-Maretimo Stream was believed

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		to connect hydrologically to the Wicklow Mountains SAC, for which Otter are designated, with the Stream occurring within the Otters natural range, upon further analysis this has been determined to be false. The Carysfort-Maretimo Stream does not connect hydrologically to the Wicklow Mountains SAC, and the Stream itself is culverted for almost all of its route under urban fabric rendering it unsuitable for use by Otter.
3(B)	The pathway for otter from Wicklow Mountains SAC to reach the Carysfort-Maretimo Stream is not clear. In addition, it is not clear if the Carysfort-Maretimo Stream provides suitable otter habitat, as in section 4.4.4 of the AA Screening Report, it states 'Accounting for the above, there will be no direct disturbance to potential otter habitat' following a description of the Carysfort- Maretimo Stream. The applicant is asked to clarify the pathway which it is believed otter from Wicklow Mountains SAC may take to reach Carysfort-Maretimo Stream. The applicant is also asked to clarify whether the Carysfort-Maretimo Stream provides suitable habitat for otter, and as such, if there is potential for disturbance to otter as a result of project works.	As above - A typographical oversight was corrected to ensure the Wicklow Mountains SAC 002122 is consistently referenced throughout the AAS. The European Sites which have been screened in during the AA Screening and assessed in the NIS include: • South Dublin Bay SAC [000210]. • South Dublin Bay and River Tolka Estuary SPA [004024]. • North-West Irish Sea SPA [004236]. Please note that the Wicklow Mountains SAC 002122 has therefore not been screened in during the AA Screening process, and has been excluded from the NIS. Please refer to both reports (AAS+NIS) which have been updated to correct this oversight. Ultimately, the Carysfort-Maretimo Stream was believed to connect hydrologically to the Wicklow Mountains SAC, for which Otter are designated, with the Stream occurring within the Otters natural range, upon further analysis this has been determined to be false. The Carysfort-Maretimo Stream does not connect hydrologically to the Wicklow Mountains SAC, and the Stream itself is culverted for almost all of its route under urban fabric rendering it unsuitable for use by Otter.
3(C)	In Section 4.4.1.1 North Bull Island SPA and Dalkey Islands SPA are included in the list of SPAs which will be protected from ex-situ effects, however, these sites have been screened out in the AA Screening Report. The applicant is	Section 4.4.1.1 of the NIS was reviewed to ensure consistency with the AAS. This section has now been updated to exclude North Bull Island SPA and Dalkey Islands SPA as the potential for direct and indirect effects, including the

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	asked to clarify whether there is a potential for ex-situ effects to these European Sites.	potential for ex-situ effects on these European Sites were screened out in the AA Screening Report.
3(D)	In Section 4.4.2.4, mitigation is provided for timing of vegetation clearance to protect breeding and wintering SCI birds that may be utilising the site. However, in the AA Screening Report, only Herring Gull, an SCI of Northwest Irish Sea SPA, is screened in for potential ex-situ effects. In the EIAR Biodiversity Chapter, this species is said to use chimney structures on the St. Teresa's House building. Mitigation for potential disturbance to breeding Herring Gull during works associated with St. Teresa's House building, such as timing of works, is not provided. The applicant is asked to clarify whether it is expected that proposed works have the potential to impact other SCI species through disturbance to ex-situ sites. The applicant is also asked to provide appropriate mitigation to protect breeding Herring Gull during works associated with St. Teresa's House building.	The only SCI species confirmed to be breeding on Site was Herring Gull. The wording has been corrected (section 4.4) so that the statement does not suggest that additional SCI seabird species breed within the development lands. Mitigation for potential disturbance to breeding Herring Gull during works associated with St. Teresa's House building have been provided in the updated NIS report; See page 46 of NIS, Section 4.4.2.1 pre-construction herring gull mitigation and Section 4.4.3.5 construction phase herring gull mitigation.

3 References

DNV (2026a) Appropriate Assessment Screening Report for Proposed Amendments at St Teresa's Lands, Temple Hill, Monkstown, Blackrock, Co. Dublin Prepared for Oval Target Ltd.

DNV (2026b) Natura Impact Statement Report for Proposed Amendments at St Teresa's Lands, Temple Hill, Monkstown, Blackrock, Co. Dublin Prepared for Oval Target Ltd.

DNV (2026c) Chapter 6: Biodiversity (of the EIAR) for Proposed Amendments at St Teresa's Lands, Temple Hill, Monkstown, Blackrock, Co. Dublin Prepared for Oval Target Ltd.

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Driven by its purpose, to safeguard life, property, and the environment, DNV helps tackle the challenges and global transformations facing its customers and the world today and is a trusted voice for many of the world's most successful and forward-thinking companies.