DNV

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

Natura Impact Statement

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.

The AA Screening Report concluded that a degree of uncertainty exists in whether the Proposed Development could give rise to potentially significant effects on five European sites, namely:

- South Dublin Bay SAC [000210].
- South Dublin Bay and River Tolka Estuary SPA [004024].
- North-West Irish Sea SPA [004236].

A Natura Impact Statement (NIS) has therefore been prepared for the Proposed Development. The purpose of this NIS report is to provide information for the relevant competent authority to carry out a Natura Impact Statement (NIS) 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 c0-authored by CBH and AC, Senior Ecologists with DNV, reviewed by AC, and approved by BL, 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).

AC is a skilled general ecologist with six years' experience; she is an Associate member of CIEEM (ACIEEM) with an MSc in Ecological Management and Conservation Biology from Queen's University Belfast. AC has a wealth of experience authoring and reviewing Screenings for Appropriate Assessment (AA), Natura Impact Statements (NIS), Ecological Impact Assessments (EcIA) and Biodiversity Chapters for Environmental Impact Assessment Reports (EIAR). Subsequently, she is very familiar with the process of ecological assessment and the relevant legislation. She is knowledgeable in a range of survey techniques, including bats, mammals, birds, amphibians, invasive species and habitat surveys.

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 on lands 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 on 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.

See Figure 2 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)

SuDS features are discussed in further detail in Section 4.4.1 of this Report.

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)

FIGURE 4. PROPOSED LANDSCAPE PLAN (MITCHELL AND ASSOCIATES, 2025)

1.3.3 Proposed Landscape Plan

The Proposed Landscape Plan has been prepared by Mitchell and Associates, Chartered Landscape Architects (July 2025). An overview of the Master Landscape Design is included below but can be viewed in further detail under separate cover, accompanying this application.

The Proposed Landscape Plan includes the following elements:

- Grass Lawns; free draining
- Pollinator friendly planting of Hedge, Shrubs, Perennials, & Groundcover to include; flowering, shade tolerant and pollen rich plants.
- Native Trees and Hedgerows; Comprising native tree species and includes native woodland planting

(See Figure 4 above for the illustrated landscape plan).

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 Protected 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 Natura 2000, a network of protected sites throughout the European Community.

SACs and SPAs are collectively known as “Natura 2000” 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 ‘Appropriate Assessment’ (AA) is an assessment required prior to the grant of planning permission to determine whether a plan or project, based on best scientific knowledge, will have an adverse effect on the integrity of a European site, either alone or in combination with other plans and projects. It is required for any plan or project not directly connected with or necessary to the management of a site but likely to have a significant effect on it.

An AA is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a Natura 2000 site. Paragraph 3 states that:

“*6(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site, in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

2.1.1 Legislative Context

The obligations in relation to a Natura Impact Statement (NIS) have been implemented in Ireland under Chapter 3 of Part 6 of the Planning and Development Act 2024, and in particular Section 215 in relation to Natura Impact Statements.

A NIS may be prepared and submitted to the competent authority by the applicant for permission.

The preparation of a NIS must comply with the following content requirements as per the Planning and Development Act 2024:

- The NIS must be prepared by a person with the necessary scientific competence.
- It must specify all habitat types and species for which the relevant European site(s) is (/ are) designated and those likely to be significantly affected by the development.

- The NIS must identify all potential significant effects of the development on the relevant European site(s), considering its (/ their) conservation objectives. This includes effects arising from the development itself or in combination with other plans or projects.
- It must assess the identified effects and their implications for the European site(s).
- The NIS should identify any measures proposed to avoid or reduce adverse effects on the European site(s).
- Based on the assessments, the NIS must conclude whether the proposed development will adversely affect the integrity of the European site(s). Additionally, this may extend to:
    - Retrospective consent applications, the NIS must conclude whether the development has, is, or will adversely affect the integrity of the European site.
    - Requests to alter or extend permissions, the NIS must conclude whether the proposed changes will adversely affect the integrity of the European site.

Following the preparation and submission of a NIS by the applicant for permission, the competent authority shall carry out an appropriate assessment of the relevant development as per the obligations set out in the Planning and Development Act 2024, Part 6, Chapter 3, Section 217.

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.

Stages of Appropriate Assessment

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: *Assessment of alternative solutions***. If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.
- **Stage 4: *Assessment where no alternative solutions exist and where adverse impacts remain***. The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

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

2.3 Stage 1: Appropriate Assessment Screening Conclusion

An AA Screening Report was prepared for the Proposed Development by DNV in January 2026.

The conclusion of the AA Screening Report is as follows:

"The Proposed Development on lands 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).*

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."***

As such, this NIS will assess the potential effects of the Proposed Development on:

- South Dublin Bay SAC [000210]
- South Dublin Bay and River Tolka Estuary SPA [004024]
- North-West Irish Sea SPA [004236]

These sites are linked to the Proposed Amendment Site via hydrological, hydrogeological, land, and air pathways. (shown in Figure 5).

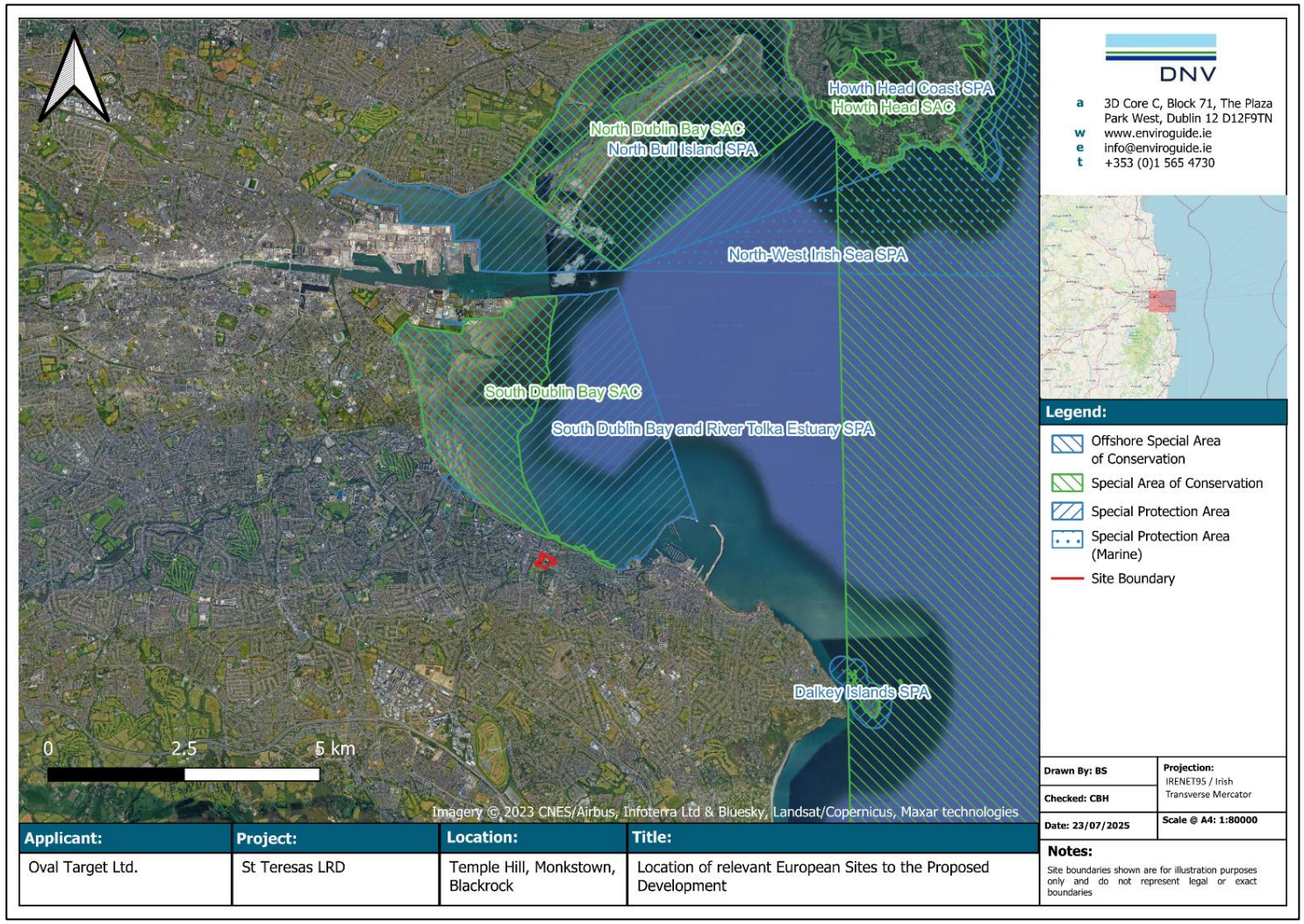

FIGURE 5. RELEVANT EUROPEAN SITES AS IDENTIFIED IN AA SCREENING (DNV, 2026).

3 NIS METHODOLOGY

3.1 Guidance

This NIS 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 (European Commission, 2021)*;
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021;* and
- *Amendments to section 42 of the Planning and Development Act 2000, as amended and associated Planning and Development Regulations 2001. Department of the Environment, Heritage and Local Government. (2021). Circular Letter: EUIPR 01/2021.*

3.2 NIS Steps

This NIS has been prepared following the steps described below:

- Description of the baseline existing environment at the Site of the Proposed Development;
- Review and description of available data for the relevant European site(s) potentially affected as identified in the Screening Report (DNV, 2025);
- Identification and description of potential effects on the relevant European site(s) and their designated QIs/SCIs;
- Assessment of the likely significance of the effects and/or impacts identified on the relevant QIs/SCIs in view of their Site-Specific Conservation Objectives (SSCOs) where available;
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the relevant QIs/SCIS;
- Identification of appropriate mitigation measures to remove the likelihood of significant effects on any European site(s) and their QIs/SCI; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects once mitigation measures are adhered to.

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 the NIS. The desktop study, completed in April 2023 and updated in August 2025, relied on the following sources:

- Information on the network of European sites, relevant boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie and the European Environment Agency (EEA) at https://natura2000.eea.europa.eu/;
- Information on the status of EU protected habitats and species in Ireland, obtained from the NPWS Article 17 reports;
- Text summaries of the relevant European sites taken from the respective Site Synopses for each site, 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 extent, nature and location of the Proposed Development, provided by the applicant and their design team.

A comprehensive list of all the specific documents and information sources consulted in the completion of this report is provided in Section 6 - References.

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 4.1.2.

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

Survey	Surveyor	Dates
PEA 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 Impact Prediction Assessment

Potential impacts on the relevant European site(s) identified during the AA Screening are based on information regarding their QIs and/or SCI species, and the attributes and targets relating to their SSCOs where available. These have been informed by the desk study and any field surveys carried out prior to the preparation of this report.

Impact prediction is based on the Source-Pathway-Receptor (S-P-R) model. The following describes the steps of the S-P-R approach taken in this NIS:

- Potential sources of effects were identified based on the Proposed Development description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by Species of Conservational Importance (SCI) bird species outside of their designated SPAs).
- Up-to-date GIS spatial datasets for water catchments as well as any information from relevant site investigations and/or field surveys were used to identify the QIs/ SCIs within the relevant European site(s) that have a notable S-P-R connection to the Proposed Development:
    - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any QIs/SCIs.
    - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any QIs/SCIs.
    - Air and land connectivity assessed based on Proposed Development details and proximity to QIs/SCIs.
    - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Identification of potential impacts for those QIs/SCIs linked to the Proposed Development via notable S-P-R connections.

Where the preceding steps identified any potential for adverse impacts on any QIs/SCIs for the relevant European site(s), appropriate mitigation measures to eliminate the potential for significant adverse effects are identified in this report.

3.6 Limitations

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

4 NATURA IMPACT STATEMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology, Geology and Hydrogeology

The Proposed Development 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 (Brewery Stream) (WFD name: Brewery Stream_010) (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 (Brewery Stream) flows for approximately 0.34km before entering Dublin Bay (IE_EA_090_0000) at Blackrock. The WFD status of the Carysfort-Maretimo (Brewery Stream_010) is 'Poor' and its risk projection is currently under review. The WFD status of Dublin Bay is 'Good', and its risk projection is 'Not at Risk' (EPA, 2025).

The Monkstown Stream (IE_EA_09B130400) is the next closest to the Site of the Proposed Development; this is situated approximately 0.56km southeast of the Site where it also flows into Dublin Bay after 1.4km. This stream is, like the above Carysfort-Maretimo (Brewery Stream), encompassed within the Brewery Stream_010 river waterbody. It is classed as being of 'Poor' quality for the survey period 2016-2021.

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 (2016-2021)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
Carysfort-Maretimo Stream and Monkstown Stream (Brewery_010)	IE_EA_09 B130400	West	0.025 (at closest point)	Poor	Under Review	0.025km west of the Site
Coastal Water Bodies						
Dublin Bay	IE_EA_09 0_0000	North	0.3	Good	Not at Risk	Downstream of the Carysfort-Maretimo Stream (Brewery Stream_010)
Groundwater Bodies						

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km)	WFD water body status (2016-2021)	WFD 3rd cycle Risk Status	Hydraulic Connection to the Site
Kilcullen	IE_EA_G_003	N/A	N/A	Good	At Risk	Underlying groundwater-body

4.1.2 Relevant Field Survey results

4.1.2.1 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.

4.1.2.2 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. Only one species of relevance to the AA/NIS process was identified on-Site, namely, herring gull (*Larus argentatus*). Observed activity and behaviours are described in more detail below.

Herring gull (BoCCI Amber listed) was recorded on all three survey visits during the survey period and is confirmed to have successfully hatched chicks on the St. 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 (004236) located 5.4km east of the Proposed Amendments.

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 EcIA (DNV, 2025).

4.2 Summary Of Relevant European Sites

The following descriptions of the relevant habitats and species occurring within the European sites considered in this NIS have been extracted from the Standard Data Forms (EEA, 2025), Site Synopses (NPWS, 2019a) and any supporting documents available for the relevant sites.

4.2.1.1 South Dublin Bay SAC (000210)

The following descriptions of the South Dublin Bay SAC are extracted from the Site Synopsis (NPWS, 2015c) 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 Dwarf 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".

4.2.1.2 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, 2015d) for the site:

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

"In the south bay, the intertidal flats extend for almost 3 km at their widest. The sediments are predominantly well-aerated sands. Several permanent channels exist, the largest being

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

"The 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."

4.2.1.3 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 SPA 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 2,333km^2 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)."

4.2.2 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the three relevant European sites are detailed in Table 3 below.

TABLE 3. 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 (2023)) AND THE LATEST NATIONAL STATUS IS TAKEN FROM THE LATEST ARTICLE 17 REPORT (NPWS, 2019A & 2019B) AND BOCCI[1] RESPECTIVELY.

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
North-West Irish Sea SPA (004236)			
A001 Red-throated Diver (*Gavia stellata*)	n/a	Amber[2]	To maintain 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 restore the favourable conservation condition of this species in North-west Irish Sea SPA.
A013 Manx Shearwater (*Puffinus puffinus*)	n/a	Amber	To maintain the favourable conservation condition of this species in North-west Irish Sea SPA.
A017 Cormorant (*Phalacrocorax carbo*)	n/a	Amber	To restore the favourable conservation condition of these species in North-west Irish Sea SPA.
A018 Shag (*Phalacrocorax aristotelis*)	n/a	Amber	
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	

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

[2] 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
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)			
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	

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
2110 Embryonic shifting dunes	Good	Inadequate	
South Dublin Bay and River Tolka Estuary SPA (004024)			
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	
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	

QI / SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
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.

4.3 Impact Prediction

This section follows the S-P-R method as outlined in section 3 to identify if and how any of the QIs/SCIs of the relevant European site are linked to the Proposed Amendment. Once the connections have been identified the potential impacts of the Proposed Amendment on the QIs/SCIs of the identified relevant European sites are assessed.

For the purposes of objectivity and clarity, mitigation measures **are not considered in the impact prediction.** This includes all measures that will act limit or eliminate the potential for significant adverse impacts on the relevant European site.

4.3.1 Potential impacts of the Proposed Development on key Species and Habitats

The following elements of the Proposed Development were identified in the AA Screening report and are 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;
    - Water quality impacts on otter that may utilise the Carysfort Maretimo stream
- Indirect ex-situ habitat loss, disturbance/displacement or population density impacts on SCI species.

Operational Phase *(Estimated duration: Indefinite)*

- Surface water drainage from the Site of the Proposed Amendment;
- Foul water from the Proposed Amendment;
- Indirect habitat loss, disturbance/displacement or population density

Table 4 below outlines the identified pathways between the Proposed Amendment and the relevant QIs/SCIs and assesses the potential significant effects of the Proposed Amendment on these. The assessment outlined below does not consider mitigation measures that will be implemented as part of the Proposed Development, but the nature of mitigation that will be required to eliminate the potential for significant adverse impacts is identified in the table, if any.

TABLE 4. ASSESSMENT OF THE POTENTIAL IMPACT OF THE PROPOSED DEVELOPMENT ON THE QIS AND SCIS OF THE RELEVANT EUROPEAN SITES. THOSE QIS/SCIS FOR WHICH NOTABLE IMPACT PATHWAYS WERE IDENTIFIED HAVE BEEN HIGHLIGHTED IN GREEN.

Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
SACs			
South Dublin Bay SAC (000210)			
1140 Mudflats and sandflats not covered by seawater at low tide 1210 Annual vegetation of drift lines 1310 Salicornia and other annuals colonising mud and sand 2110 Embryonic shifting dunes	Hydrological connection via surface water run-off during construction and operation phase, or from discharges to ground during the 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 (Brewery Stream). During a rainfall event, these pollutions may be carried via the medium of surface water into the Carysfort-Maretimo (Brewery 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).	Yes, construction and operation phase mitigations are required to ensure no overland contaminated surface water run-off or contaminated waters that discharge to ground occur.
Wicklow Mountains SAC (002122)			
Otter (*Lutra Lutra*)[3]	Hydrological connection via surface water run-off of contaminated water during construction phase, disturbance/displacement during construction phase activities	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 (Brewery Stream). During a rainfall event, these pollutions may be carried via the medium of surface water into the Carysfort-Maretimo (Brewery 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). Additionally, construction activities such as increased human presence, noise and vibrations from machinery could	Yes, construction phase mitigations required to ensure no significant water quality or disturbance and displacement impacts occur on this species.

[3] Only included Otter in this list as it is the only one screened in from the Appropriate Assessment Screening Report for this SAC. For a complete list of QI species/habitats please refer to the NPWS conservation objectives for this site.

Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
		cause disturbance and/or displacement of Otter which may be present in the vicinity.	
SPAs			
South Dublin Bay and River Tolka Estuary SPA (004024)			
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]	Hydrological connection via surface water run-off during construction and operation phase, or from discharges to ground during the construction phase. A land air pathway also exists during the operation phase.	Given the proximity of the Site to both the Carysfort-Maretimo (Brewery Stream) 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, in which pollutant laden surface and groundwater could travel to reach this protected site.	Yes, construction and operation phase mitigations are required to ensure no overland contaminated surface water run-off or contaminated waters that discharge to ground occur.

Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
Common Tern (Sterna hirundo) [A193] Arctic Tern (*Sterna paradisaea*) [A194] Wetland and Waterbirds [A999]			
North-West Irish Sea SPA (004236)			
A001 Red-throated Diver (*Gavia stellata*) A003 Great Northern Diver (*Gavia immer*) A009 Fulmar (*Fulmarus glacialis*) A013 Manx Shearwater (*Puffinus puffinus*) A017 Cormorant (*Phalacrocorax carbo*) A018 Shag (*Phalacrocorax aristotelis*) A065 Common Scoter (*Melanitta nigra*) A177 Little Gull (*Larus minutus*) A179 Black-headed Gull (*Chroicocephalus ridibundus*) A182 Common Gull (*Larus canus*) A183 Lesser Black-backed Gull (*Larus fuscus*)	Indirect land and air pathway identified	In addition, Herring Gull was found to be breeding on the existing structure at the Site, which makes up the old St. Teresa's House. This species is an SCI listed species protected within this SPA for breeding. This species could be subject to disturbance, displacement or mortality during Construction in the absence of mitigation. No further SCI species of this SPA were identified as being present within the Site.	Mitigations are required to ensure protection of this SCI species against disturbance, displacement or direct mortality or injury, as herring gull was found to be breeding on Site.

Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
A184 Herring Gull (*Larus argentatus)* A187 Great Black-backed Gull (*Larus marinus*) A188 Kittiwake (*Rissa tridactyla*) A192 Roseate Tern (*Sterna dougallii*) A193 Common Tern (*Sterna hirundo*) A194 Arctic Tern (*Sterna paradisaea*) A195 Little Tern (*Sterna albifrons*) A199 Guillemot (*Uria aalge*) A200 Razorbill (*Alca torda*) A204 Puffin (*Fratercula arctica*)			

4.3.2 Potential for In-combination Effects

4.3.2.1 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.

The larger developments within the vicinity of the Site are listed in Table 5 below.

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.			
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**			

Planning Reference	Planning Authority	Status	Location
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** 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**			

Planning Reference	Planning Authority	Status	Location
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 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			

Planning Reference	Planning Authority	Status	Location
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.			
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.			

Planning Reference	Planning Authority	Status	Location
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 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.

Planning Reference	Planning Authority	Status	Location
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 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);

Planning Reference	Planning Authority	Status	Location
• 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, 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.			

4.3.2.2 Relevant Policies and Plans

The local policies and plans detailed in the previous table 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.

In addition, the operation of Ringsend WWTP was considered during the Appropriate Assessment Screening process, where the following was determined:

"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 Avoidance and Mitigation Measures

The following sections outline the avoidance and mitigation measures identified to eliminate the potential for significant adverse impacts on the relevant European sites. Once the recommended measures outlined in the following sections are implemented in full, no adverse impacts on the relevant European sites or their QIs/SCIs are anticipated as a result of the Proposed Development. These mitigation measures will be included in a Construction and Environmental Management Plan (CEMP) that will be prepared prior to commencing works by the appointed construction contractor.

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 that will be outlined in the accompanying Construction Environment Management Plan (CEMP), and the Sustainable Drainage Systems (SuDS) which are to be included as part of the overall design of the Operational Phase of the proposal.

4.4.1.1 Construction Phase Best Practice

The following measures, designed to protect surface water quality, will serve to prevent any negative effects occurring in *South Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA,* as-well as ex-situ effects on SCI species of *North-west Irish Sea SPA* as a result of Construction Phase groundwater discharges from the Site. These mitigation measures will treat the source (e.g., refuelling of plant to be carried out at designated refuelling station locations on Site) or remove the pathway (e.g., no release of wastewater generated on-Site to ground during the Construction Phase).

All works carried out as part of the Proposed Amendment Development will comply with all Statutory Legislation including the Local Government (Water Pollution) Acts, 1977 and 1990. Personnel working on the Site will be trained in the implementation of environmental control and emergency procedures. Procedures and relevant documents produced will be formulated in consideration of standard best international practice including but not limited to:

- CIRIA, (2001), Control of Water Pollution from Construction sites, Guidance for Consultants and Contractors;
- Construction Industry Research and Information Association (CIRIA) Environmental Good Practice on Site (C650), 2005;
- BPGCS005, Oil Storage Guidelines;
- UK Pollution Prevention Guidelines (PPG) UK Environment Agency, 2004;
- Construction Industry Research and Information Association CIRIA C648: Control of water pollution from linear construction projects: Technical guidance (Murnane et al. 2006);
- CIRIA C648: Control of water pollution from linear construction projects: Site guide (Murnane et al. 2006); and
- Inland Fisheries Ireland (2016). Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters.

In addition, standard best practice measures will be implemented throughout the Construction Phase to ensure no construction-related pollutants are discharged into the surface water or groundwater at and surrounding the Site, which could subsequently be transferred by same to the SACs/SPAs. Standard best practice measures that will be implemented on the Site during the Construction Phase are as follows:

- Silt fencing will be used along the Site boundary and the nearby Carysfort-Maretimo Stream which may provide a hydrological link to nearby designated sites.
- Any drains or sewers, where present, which could act as pathways for contamination from the Site will be blocked where required.
- Location of stilling/settling ponds will take into account groundwater vulnerability at the site and will be located in suitable areas and at distance from the Carysfort-Maretimo Stream.
- Discharge water generated during placement of concrete will be stored and removed off Site for treatment and disposal.
- There will be no washing out of any concrete trucks on Site. Any washing of chutes will be carefully collected in a designated container which will be subsequently sent off site for compliant waste management.
- Specific areas for storage, delivery, loading/unloading of materials will be designated, which will have appropriate containment/spill protection measures where required. These storage areas

will be located in suitable areas and at distance from any watercourses hydrologically connected to nearby designated sites.

- Leachate generation from stockpiles or waste receptacles will be prevented by using waterproof covers.
- Prolonged exposure of contaminated soils or groundwater to the atmosphere will be avoided where practical or unnecessary.
- Appropriate bunding, storage and signage arrangements for all deleterious substances will be used.
- Robust and appropriate Spill Response Plan and Environmental Emergency Plans will be included within the Contractor's CEMP and the details of which will be communicated, resourced and implemented for the duration of the works.
- Control measures and spill clean-up equipment adequate to treat spills at the Site will be available and staff will be trained and experienced in using said equipment.
- A register will be kept of all hazardous substances either used on Site or expected to be present. The register shall be available at all times and shall include as a minimum: valid safety sheets; Health & Safety, environmental controls to be implemented when storing, handling, using and in the event of spillage of materials; emergency response procedures/precautions for each material; the Personal Protective Equipment (PPE) required when using the material.
- All existing services will be mapped, and a plan will be put in place to decommission/divert and manage any drains or sewers which are associated with the Site.
- A plan for dealing with any unknown drains or services which may be encountered during the works will be set out and implemented.
- Any surface water inflow into the main areas of excavation will be minimised where possible.

Maintenance of Plant and Machinery

- All plant and equipment will be regularly cleaned and properly maintained.
- There will be no washing out of any concrete trucks on Site.
- Pumped concrete will be monitored to ensure there is no accidental discharge and will be carried out in dry weather and with impermeable pouring mats laid down where possible.

Building/Road Network and Services

- All car parking and refuel areas at the Site will be located on substrate underlain with an impermeable liner to prevent contaminant leaching to groundwater.

Earthworks Mitigation

The proposed earthworks mitigation measures for both the Construction and Operational Phases include:

- A street sweeper will attend Site regularly to clean the road when there are truck movements in and out of the Site.
- Hard surface roads will be regularly swept to remove mud and aggregate materials from their surface;
- Public roads outside the Site will be regularly inspected for cleanliness, and cleaned as necessary;
- Material handling systems and Site stockpiling of materials will be designed and laid out to minimise exposure to wind; and

- Water misting or sprays will be used on stockpiles as required if particularly dusty activities are necessary during dry or windy periods.

Storage and Use of Fuels, Oils, and Chemicals

- Appropriate bunding, storage and signage arrangements for all deleterious substances (e.g., fuels, oils, and chemicals) will be used.
- Fuels, lubricants, and hydraulic fluids for equipment used on the construction Site will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice (Enterprise Ireland BPGCS005).
- Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the Site for disposal or recycling.
- Diesel tanks, used to store fuel for the various items of machinery, will be self-contained and double-walled.
- The risk of spillage and leaks of oil from cars parked in the Development during the Construction Phase are considered unavoidable. To reduce the potential impacts, oil interceptors will be incorporated into the Site drainage design.
- Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the Site and properly disposed of.
- Refuelling will be carried out from tanks or delivery vehicles on a designated impermeable surface and will not be left unattended.
- Plant will not be left running when not in use (i.e., no idling) and plant with dust arrestment equipment will be used where practical.

Spill/Emergency Response Plans

- Robust and appropriate Spill Response Plan and Site Environmental Emergency Plans (SEEP) will be implemented for the duration of the works:
    - Identifying fuel storage and refuelling locations on designated areas within the compound, away from drainage ditches/waterbodies (where present), and on substrate underlain with an impermeable liner to prevent contaminant leaching to groundwater;
    - Identifying spill kit locations (spill kits will be required for each piece of heavy equipment (e.g., excavators, loaders, trucks, etc.,) which will be at least 21L drum size each with spill pads, sorbent, small boom, plastic rubbish bag and gloves;
    - A specially trained and dedicated Environmental and Emergency Spill Response team will be appointed before the commencement of works on Site.
    - Staff will be trained and experienced in using appropriate control measures and spill kits on-Site and will be familiar with the location of all spill kit locations and the Site layout.
- A register will be kept of all hazardous substances either used on Site or expected to be present. The register shall be available at all times and shall include as a minimum:
    - Valid safety sheets; Health & Safety, environmental controls to be implemented when storing, handling, using and in the event of spillage of materials;
    - Emergency response procedures/precautions for each material;
    - PPE is required when using the material.

Waste Management and Disposal

Waste management and disposal, which includes wastewater, will comprise the following:

- All existing services will be mapped, and a plan will be put in place to decommission/divert and manage any drains or sewers which are associated with the Site.
- Portaloos and/or containerised toilets and welfare units will be used to provide facilities for Site personnel. All associated waste will be removed from the Proposed Development Site by a licenced waste disposal contractor.
- Mixer washings are not to be discharged into ground or drainage ditches and will be collected and disposed of at a suitably licenced facility.

In addition, a minimal waste approach of reduction, reuse and recycling will be utilized where practicable/appropriate. Where this cannot be carried out, all wastes will be disposed of at licenced waste facilities.

4.4.1.2 Surface Water Management

Surface water discharge rates from the proposed surface water drainage network will be controlled by the below proposed measures, which have the capacity to provide attenuation on the surface water run-off rates from the Site, thereby reducing run-off rates from surface water on Site during its Operational Phase, and further mitigating the risk of surface water overflow during excessive rainfall/flooding events:

- SuDs measures, which includes permeable paving and green roofs;
- Petrol Interceptors;
- Attenuation tanks.

It should also be noted that Surface water at the Proposed Amendment Development will discharge into the existing public stormwater network.

4.4.1.3 SuDS

The following has been extracted from the Drainage Report in relation to SuDs measures embedded into the design of the proposal (JJC, 2025a). The criteria set out in Section 1.3 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).

4.4.2 Pre-Construction Phase Mitigation

4.4.2.1 Pre-Construction Herring Gull Mitigation

Herring gull was recorded on Site and is classed as a probable breeder within the confines of the Site. As such, it is recommended that should any vegetation removal or building demolition works occur at this Site, the works should not commence during the breeding bird nesting season (1st March – 31st August, inclusive).

If this cannot be done, then a suitably qualified ecologist will be required to survey the vegetation and/or buildings up to 48 hours before removal to confirm that there are no bird nests/chicks present. Should nesting birds be found to be present, the clearance works will be delayed until after the bird nesting season (which runs from 1st March to 31st August) or until young have fledged.

A project ecologist will be appointed and consulted in relation to all onsite works; All demolition works (where relevant) will have prior approval of a project ecologist. A pre-construction inspection will be carried out for nesting herring gull if demolition works are proposed during bird nesting season (1st March – 31st August, inclusive). The inspection will include a visual inspection of roofs, ledges, gutters, plant areas, with a focus on identifying any nest structures, territorial behaviour, and sitting adults. Should a nest be present then a buffer zone for exclusion of works and delay of works (if required) will be established until all young have fledged.

4.4.3 Construction Phase Mitigation

4.4.3.1 Mitigation 1: Water Quality Protection

The following applies to all stages of the Construction Phase for the Proposed Development unless specific measures have been identified. As it has been identified that the Proposed Development could potentially affect SCI/QI species associated with the nearby European sites during the Construction Phase as a result of water quality impacts, the mitigation measures listed in the following sections will be undertaken.

Construction Phase mitigation measures to protect identified European sites

The following mitigation measures are proposed to negate any potential risk of contamination of Dublin Bay and associated SAC and SPAs due to concrete works during the Construction Phase:

- If concrete mixing is carried out on Site, mixing shall be sited in a designated area with an impervious surface, away from nearby watercourses, specifically the Brewery Stream.
- Measures shall be taken during all aspects of construction to ensure that no cement or concrete can enter the Brewery Stream or downstream seawaters of Dublin Bay. Concrete trucks and implements shall be kept away from the Brewery Stream and no washing out of trucks or implements is permitted. Concrete with a suitable drying time or appropriate protection of working areas, will be used.
- Run off from hard surface areas and concrete mixing areas must not enter Brewery Stream to reduce the potential for contaminants entering the water.
    - This will be controlled via the use of physical barriers such as silt traps, berms, or sandbags where appropriate (please refer to the CEMP report for full details).
- Surplus concrete shall be stockpiled away from the construction area and removed offsite for recycling/reuse as appropriate.

These are in addition to the best practice and embedded measures proposed in the above section.

4.4.3.2 Mitigation 2: Air Quality Protection

In addition to the embedded design measures detailed in Section 4.4.1 above, in order to protect the surrounding waters and habitats/species therein from dust deposition during earthworks, the following mitigation measures are proposed and included shall be included the accompanying CEMP:

- Dust generation will be controlled through proper placement of stockpiles away from sensitive receptors such as the Brewery Stream and taking note of the prevailing wind direction.
- Stockpiles will be located in sheltered parts of the Site, away from sensitive habitats, i.e. waterbodies, and watered where required.
- Staff will monitor dust levels during working hours
- Bowsers will be available during dry periods for surface watering to keep unpaved areas moist.
- Any dust emitting works will be postponed during high winds (gales) until winds have subsided.
- Vehicles delivering material will be covered to prevent the escape of dust.
- A wheel washing facility will be installed near the Site compound for use by vehicles exiting the Site

- Dust deposition rate will be measured by Bergerhoff Dust Deposit Gauges, if required, and situated in strategic locations in the Site including boundary vegetation.
- Results will be quantified in a lab after 30 days and monitoring reports prepared by the relevantly qualified person.
- A limit of 350mg/m^2 per day will be adhered to.

4.4.3.3 Mitigation 3: Noise Suppression

SCI species such as birds and otter are susceptible to disturbance from increased noise and human presence as a result of the Construction Phase of the Proposed Development. To mitigate this disturbance, the following general measures will be implemented:

- Selection of plant with low inherent potential for generating noise.
- Siting of plant as far away from sensitive receptors as permitted by Site constraints.
- Avoidance of unnecessary revving of engines and switch off plant items when not required.
- Keep plant machinery and vehicles adequately maintained and serviced.
- Proper balancing of plant items with rotating parts.
- Keep internal routes well maintained and avoid steep gradients.
- Minimise drop heights for materials or ensure a resilient material underlies.
- Where noise originates from resonating body panels and cover plates, additional stiffening ribs or materials should be safely applied where appropriate.

4.4.3.4 Mitigation 4: Timing of Vegetation Clearance

As Herring Gull, an SCI species of the Northwest Irish Sea SPA has been recorded on Site, vegetation clearance will need to be cognisant of any potentially present Herring Gull birds that could be utilising the Site. While this species was only observed using the Site during the breeding season, it is designated as an SCI species for this SPA for both the breeding and wintering period. Although Herring Gull generally roost communally in winter. Adopting a precautionary approach for vegetation clearance - Table 6 below provides guidance for when vegetation clearance is permissible in relation to breeding and wintering ~~SCI birds~~ Herring Gull.

TABLE 6. SEASONAL RESTRICTIONS ON VEGETATION REMOVAL. RED BOXES INDICATE WHEN CLEARANCE / WORKS ARE NOT ADVISED, ORANGE BOXES INDICATE WHEN HAND / ELECTRIC TOOLS SHOULD BE USED

<table>
<tr><th>Ecological Feature</th><th>Jan</th><th>Feb</th><th>March</th><th>April</th><th>May</th><th>June</th><th>July</th><th>Aug</th><th>Sept</th><th>Oct</th><th>Nov</th><th>Dec</th></tr>
<tr><td>Breeding Birds</td><td colspan="2">Vegetation clearance permissible</td><td colspan="6"><u>Nesting bird season</u>
No clearance of vegetation or works to relevant structures permitted unless confirmed to be devoid of nesting birds by an ecologist.</td><td colspan="4">Vegetation clearance permissible</td></tr>
<tr><td>Wintering Birds</td><td colspan="2"><u>Wintering bird sensitive season</u>
Electric chainsaws, Hand tools where possible</td><td colspan="7">Vegetation clearance permissible</td><td colspan="2"><u>Wintering bird sensitive season</u>
Electric chainsaws, Hand tools where possible</td></tr>
</table>

Mulching should be undertaken off-Site except between September-October to avoid disturbance to wintering Herring Gull birds using or within the vicinity of the Site. If vegetation removal is required outside of this window, lower noise hand tools should be used, for example, electric chainsaws instead of fuel-powered chainsaws.

4.4.3.5 Mitigation 5: Mitigation for Herring Gull

As previously noted Herring Gull, which is an SCI species of the Northwest Irish Sea SPA was observed nesting on chimney structures of St. Teresa's House during the 2025 breeding season. While it is considered that there is ample suitable alternative habitat for this species in the wider area, the following measures will be applied to ensure protection of this species during the construction phase:

- Timing Restrictions - No works to the existing building fabric (including roof, ledges, parapets, façade elements) shall occur during the bird breeding season (1st March – 31st August inclusive), unless preceded by a pre-construction survey by a suitably qualified ecologist confirming absence of active nests.
- Pre-Construction Nest Surveys (See Section 4.4.2.1 above)
- Should a nest be found to be present during the pre-construction checks then a buffer zone for exclusion of works and delay of works (if required) will be established until all young have fledged.
    - This is typically 10-15m around active nests for gull species on buildings (accounting for habituation on urban areas) and will include physical demarcation of the exclusion area and toolbox talks to ensure compliance.
- Phasing of works – if full avoidance isn't possible, then:
    - Unoccupied sections will be worked first (with buffer zone in place)
    - And nesting areas will be tackled outside of the breeding season or after fledging has occurred.
- Nesting Protection Protocol – Stop Works:
    - If during construction an active nest is identified, works in that area will cease immediately and a qualified ecologist will be consulted. Works will not recommence in that area until the nest is no longer active (i.e., chicks have fledged).
- Avoidance of Indirect Disturbance:
    - Air Quality Protection / Pollution Control (see Mitigation 2)
    - Noise Suppression (see Mitigation 3)
    - Timing of Vegetation Clearance (see Mitigation 4)
    - Human Activity:
        - Limit repeated access to roof areas during nesting season
    - Artificial Lighting:
        - Avoid night-time lighting directly onto nest areas
        - Use of directional lighting with hoods/shields

4.4.4 Operational Phase

4.4.4.1 Mitigation 6: Artificial Lighting

Artificial lighting at the Site should be designed so as to minimise any potential for significant effects on SCI birds in flight throughout the Operational lifetime of the Site. Consideration should be given to the following common issues that arise as a result of light pollution: glare, light trespass, over-illumination and sky glow (Crymble, n/d). The following measures will ensure the protection of seabirds and other birds in flight throughout the lifetime of the Operational Phase of the Proposed Development:

- The lighting design will be based on the use of LED lighting which has minimal or no UV output of significance. Warmer 2700°K LED lighting will be utilized for amenity areas, as the warmer colour temperatures with peak wavelengths greater than 550nm (~3000°K) cause less impacts on bird species. This accounts for;

  - The fact that birds are sensitive to shorter wavelengths (blue and UV light) which can disorient migratory birds, leading to collisions with infrastructure or exhaustion, especially at night, when most migrations are considered to occur.
  - The fact that warmer LEDs emit less blue light and more light in longer wavelengths (yellow-red spectrum) which is less disruptive to circadian rhythms and navigation.
- External lighting will be set on motion-sensors and short (1min) timers.
- Balcony lighting should be switched off as default, with the option to turn lights on given to the room's occupants using a timer switch.
- Column heights should be carefully considered to minimise light spill. The shortest column height allowed should be used where possible.
- Fixtures should be downward facing with limited light spill. As a last resort, accessories such as baffles, hoods or louvres will be used to reduce light spill and direct it only to where it is needed.

In addition, the lighting associated with the Proposed Amendments is expected to be consistent with existing lighting conditions of the surrounding Dublin City landscape, which is heavily urbanised in nature, and, as such SCI species which may be present would be expected to be habituated to such urbanised light.

The advantages of such lighting serve to minimize ecological disruption, supports nocturnal wildlife, and aligns with best practices in sustainable lighting design, extending beyond SCI bird species of the Dublin Bay European sites.

4.5 Monitoring

Table 7 below provides a summary of the required monitoring and inspections during the Construction Phase, specifically focusing on the management of surface and groundwater protection measures as outlined in the CEMP. These measures will ensure that any potential adverse effects on European sites, and their associated SCIs and QIs, are avoided. Monitoring and inspections will be conducted regularly to verify the effectiveness of the implemented mitigation measures and to ensure compliance with environmental standards.

Ongoing monitoring will be conducted by the Contractor and ECoW to ensure that sediment control measures (e.g., sediment traps, silt fences and curtains) are functioning correctly and that any necessary maintenance or repairs are promptly undertaken.

Adherence to the CEMP will be verified through daily checks by the Site Manager and weekly audits by the ECoW or as deemed appropriate by ECoW depending on construction activity. This will help to ensure all measures are being implemented correctly and effectively.

Spill prevention and control will involve continuous monitoring of fuel storage and handling areas by the Site manager, ensuring that all safety measures such as drip trays and bunding are in place and that spill kits are readily available. Any spills will be reported immediately and cleaned up according to Site protocols.

TABLE 7. SUMMARY OF THE MONITORING REQUIREMENTS AT THE SITE DURING THE CONSTRUCTION PHASE

Measure	Monitoring
Embedded Measures	
Construction Phase Best Practice	Ongoing monitoring by the Contractor. Daily checks by the Site Manager. Weekly/frequent audits by the ECoW.
Surface Water Management	Ongoing monitoring by the Contractor. Daily checks by the Site Manager Weekly/frequent audits by the ECoW.
SuDS	Checks by relevant experienced Hydrologist/engineer, with frequency as per Hydrology Report
Building Design	Post-construction survey by Ecologist to ensure efficacy of building design in deterring bird collisions.
Construction Phase	
Mitigation 1: Water Quality Protection	Ongoing monitoring by the Contractor. Daily checks by the Site Manager Weekly/frequent audits by the ECoW.
Mitigation 2: Air Quality Protection	Daily checks by the Site Manager. Weekly/frequent audits by the ECoW.
Mitigation 3: Noise Suppression	Daily checks by the Site Manager. Weekly/frequent audits by the ECoW.
Mitigation 4: Timing of Vegetation Clearance	Supervision of all vegetation clearance by ECoW & pre-clearance checks where necessary.
Operational Phase	
Mitigation 5: Artificial Lighting	Post-installation checks by an Ecologist to ensure compliance.

5 CONCLUSION

This Natura Impact Statement details the findings of the NIS conducted to further examine the potential direct and indirect impacts of the Proposed Amendments at St Teresa's Lands, Temple Hill, Monkstown, Blackrock, Co. Dublin, on the following European sites:

- *South Dublin Bay SAC [000210]*
- *South Dublin Bay and River Tolka Estuary SPA [004024]*
- *North-West Irish Sea SPA [004236]*
- *Wicklow Mountains SAC [002122]*

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The AA investigated the potential direct and indirect effects of the proposed works, both during construction/infill and operation, on the integrity and qualifying interests of the above European Site, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European site(s), individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

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 [000210], South Dublin Bay and River Tolka Estuary SPA [004024] or North-West Irish Sea SPA [004236]*

Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site.

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