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Appropriate Assessment Screening Report

PRESENTED TO

Dublin City Council
St Andrews Court, Fenian Street, Dublin 2

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Environmental Consultancy Services

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1 INTRODUCTION

1.1 Background

Enviroguide Consulting was commissioned by Dublin City Council to prepare an Appropriate Assessment Screening Report for a Proposed Residential Development, entitled Proposed Development at St Andrews Court, Fenian Street, Dublin 2, hereafter referred to as 'Proposed Development' or 'Site', when referring to the application Site area. This report contains information to enable the Competent Authority to undertake Stage 1 Appropriate Assessment (AA) screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

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

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

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants. CS, an Ecologist with Enviroguide, undertook the desktop research for this report.

CS has a B.Sc. (Hons) in Zoology from University of Aberdeen and a M.Sc. in Biodiversity and Conservation from Trinity College Dublin and has experience in conducting desktop assessments of environmental statements, ecological surveys and mitigation for major planning applications such as wind farms and large-scale residential developments, as well as practical field experience including habitat surveys and ornithological surveys. CS has broad understanding of ecological legislation, best practice methodologies for ecological surveys and mitigation measures, and legal compliance for planning conditions.

1.3 Description of Proposed Development

1.3.1 Site Location

The Proposed Development is located at the intersection between Fenian Street and Sandwith Street Upper, Dublin 2, and is approximately 0.1229ha in size. The Site is surrounded on all sides by urban infrastructure comprising adjacent buildings to the north and west and roads to the south and east, indicative of the urbanised nature of Dublin City.

1.3.2 Proposed Development Description

The proposal is for the construction of a new development consisting of 33 no. residential units all with private amenity space in 3 interconnected blocks arranged around a communal courtyard. These new homes will be for social housing and will be managed by Dublin City Council.

Bike parking, bin store and plant rooms are also provided at ground floor level. The building ranges in height from 4 to 7 storeys, with communal roof garden located on the roof of one of the 4-storey blocks.

To facilitate the Proposed Development, the scheme will require demolition of an existing 3-storey building, which is currently vacant.

1.3.3 Drainage and Water Supply

1.3.3.1 Surface water

The redevelopment of the Site will be served by the existing combined sewer on Sandwith St. Upper, to the north-east corner of the Site.

The Proposed Site storm drain will discharge to the existing public 1940x760mm brick sewer on Sandwith St. Upper to the north corner using a surface water attenuation system with 20m^3 attenuation storage tanks and associated Hydrobrake (or similar approved) flow control device. The discharge is limited to 2.0litres / second.

The existing Site drainage via impermeable areas and green areas of the Site are 1200m^2 in size. The Site will be fully developed with hard surface roofs, green roofs and new landscape areas.

1.3.3.1.1 SUDS

As part of the treatment train, the SuDS features have been designed to prioritise interception and reduction of flow rates (Horganlynch Consulting Engineers, 2024). The features that are incorporated into the design are:

- Green roof – this will be an intensive type roof. All necessary safety requirements are designed and constructed to ensure safe maintenance can occur. The green roof will provide interception and reduction of flow rates at the beginning of the treatment train providing source control for large area of development. After surface water has passed through the Green Roof, it will pass through to the surface water drainage network to the attenuation system. The green roofs also filter pollutants such as heavy metals, nutrients, and particulates from rainwater, as it percolates through the vegetation and soil.

The management of surface water for the Proposed Development has been designed to comply with policies and guidelines outlined in the Greater Dublin Strategic Drainage Study (GDSDS) and with the requirements of Dublin City Council. The protection of river water quality and flow is provided by interception storages within the green roof and attenuation system. The river regime and flood protection has been protected by attenuating to green field run off rates.

1.3.3.2 Foul Drainage

The foul drainage system is designed as a separate system to the storm drainage system and discharges to the public combined sewer in Sandwith St Upper via new combined connection from the Site (Horganlynch Consulting Engineers, 2024). The public sewer leads to Ringsend Wastewater Treatment Plant (WwTP) where it will be treated before draining into Dublin Bay.

The proposed Site drain discharge connections are sized with adequate capacity for the design discharge from the Proposed Development. All new kitchen drain connections to the system will be via suitably designed grease trap treatment arrangements, to comply with relevant FOGS regulations (Horganlynch Consulting Engineers, 2024).

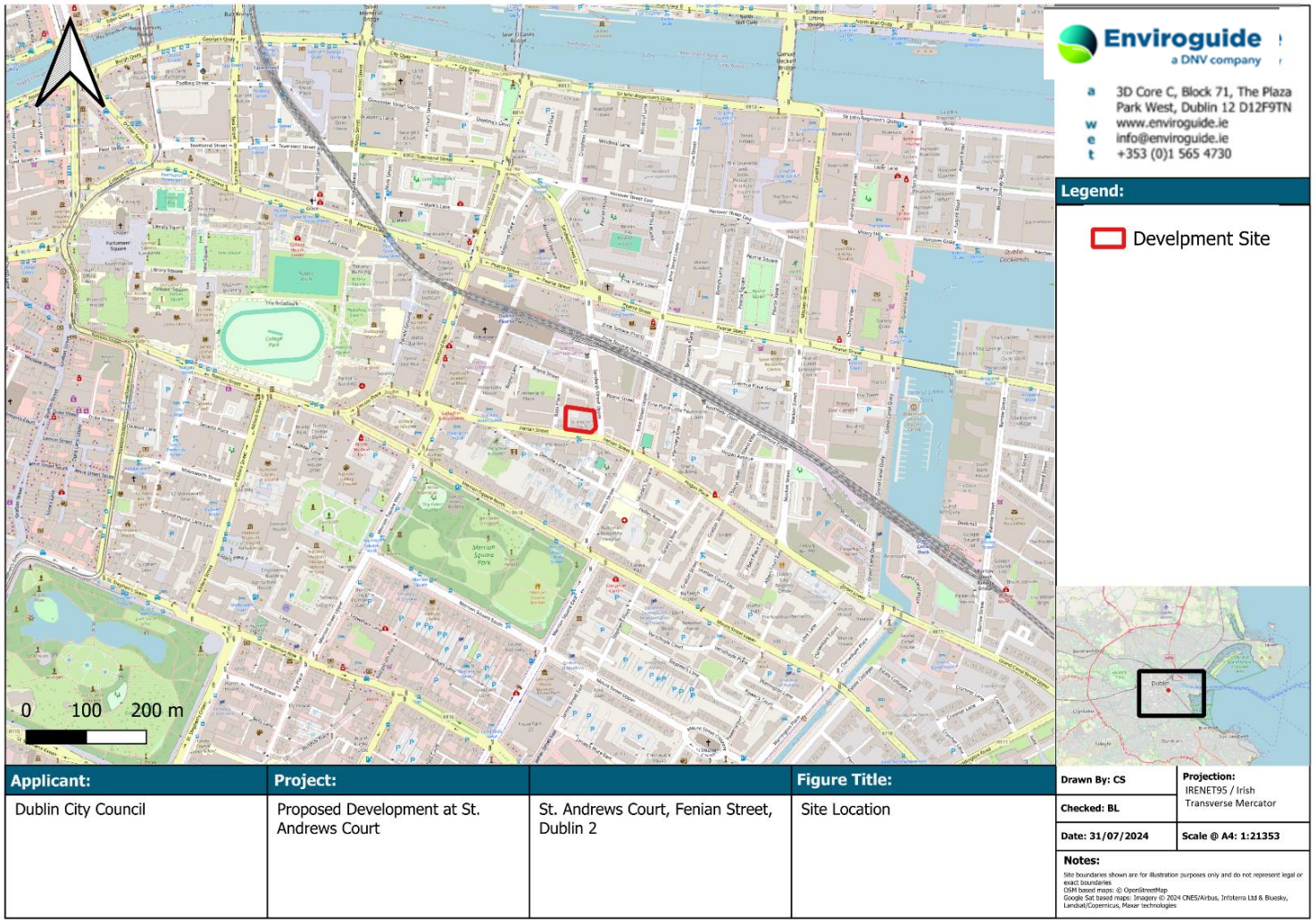

FIGURE 1: SITE LOCATION

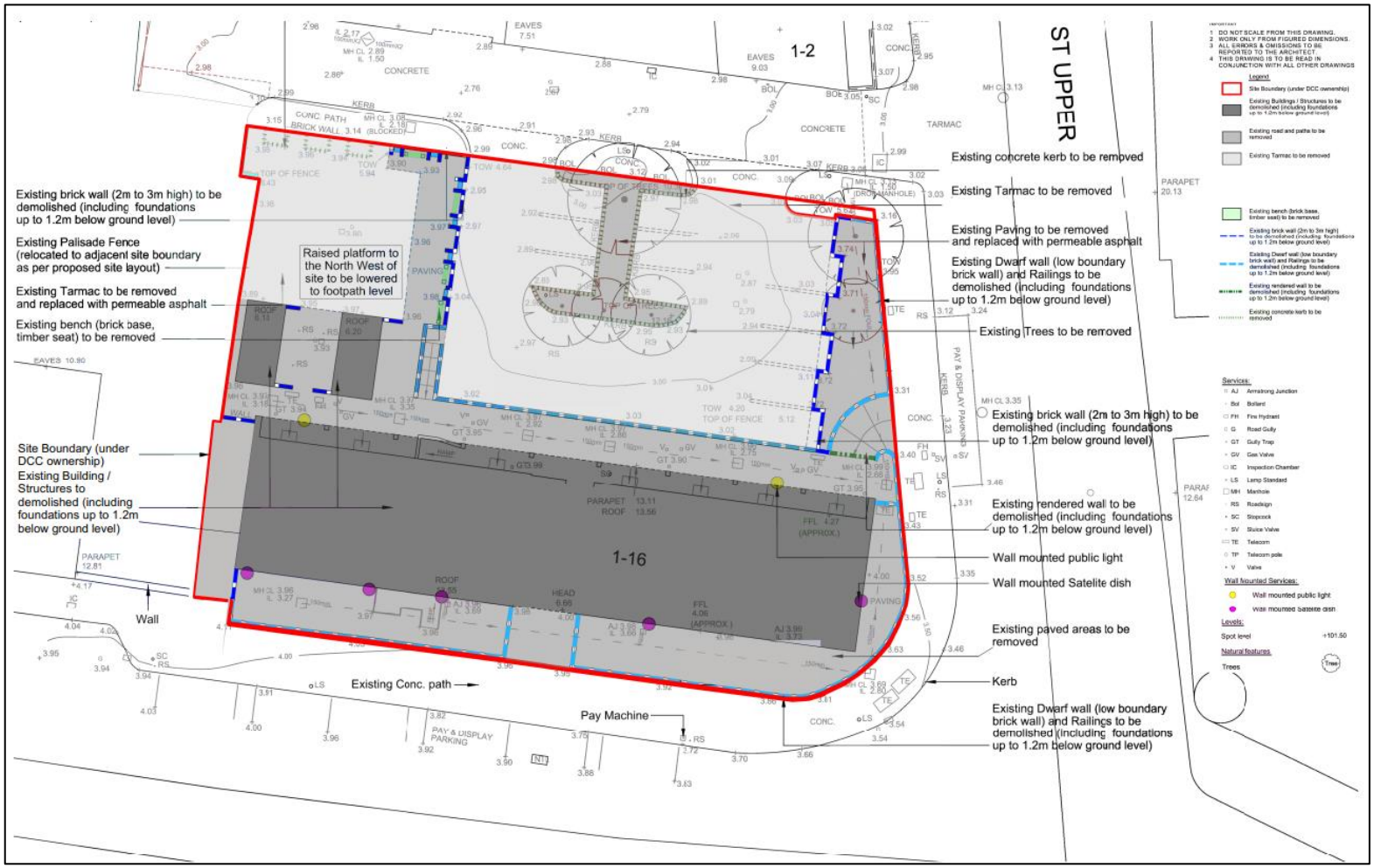

FIGURE 2. DEMOLITION LAYOUT (DRAWING NO. SAC-XX-01-DR-A-080101 EXTRACTED FROM DCC, CITY ARCHITECTS DIVISION, 2024)

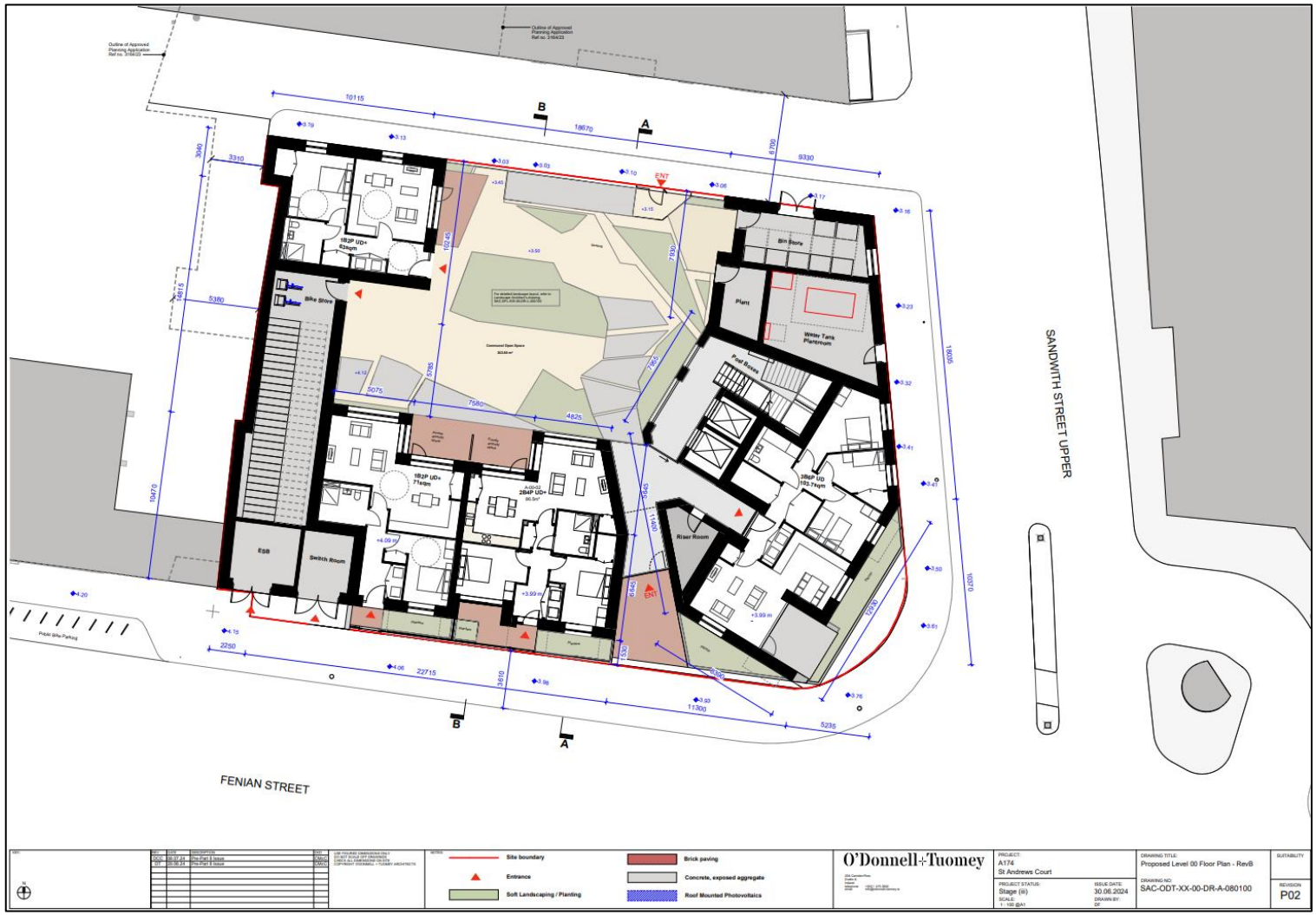

FIGURE 3. PROPOSED SITE LAYOUT (DRAWING NO. SAC-ODT-XX-00-DR-A-080100 REV P02, EXTRACTED FROM DCC, CITY ARCHITECTS DIVISION, 2024)

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

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

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

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

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

2.1.1 Legislative Context

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

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

(2)…

(3)…

(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is required if it cannot be excluded,

on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.

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

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

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

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

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

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

2.2 Policy Context

2.2.1 Dublin City Development Plan

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

- Chapter 1: Strategic Context and Vision
- Chapter 9: Sustainable Environmental Infrastructure and Flood Risk
- Chapter 10: Green Infrastructure and Recreation

TABLE 1: RELEVANT POLICIES AND OBJECTIVES OF THE DUBLIN CITY DEVELOPMENT PLAN

Aim/Target	Policies and Objectives
Chapter 1: Strategic Context and Vision	
Appropriate Assessment for development plans	P23, P24
Chapter 9: Sustainable Environmental Infrastructure and Flood Risk	
Pollution Control – Waste, Drainage, Water, Air, Noise and Light	In SI P271, P283, P290, P292, P293
Chapter 10: Green Infrastructure and Development	
European Union Natura 2000 Sites	P313 GI19
Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas	P313 GI10,
Areas of Ecological Importance for Protected Species	P315 GI13
Ecological / Wildlife Corridors	P315 GI14
Minimise Impact – Light and Noise	P316 GI18

2.2.2 Dublin City Biodiversity Action Plan

The Dublin City Biodiversity Action Plan 2021-2025 is set out to protect and improve biodiversity through the themes outlined below:

- Theme 1 - Maintaining Nature in the City
- Theme 2 - Restoring Nature in the City
- Theme 3 - Building for Biodiversity
- Theme 4 - Understanding Biodiversity in the City
- Theme 5 - Partnering for Biodiversity

Within each of the five themes There are 17 objectives for biodiversity management and conservation including the following relevant objectives for this AA screening:

- Objective 1: Ensure effective implementation of the Dublin City Biodiversity Action Plan
- Objective 2: Protect designated sites for nature conservation in accordance with the Conservation Management objectives for Natura 2000 sites and proposed Natural Heritage Areas in Dublin City.
- Objective 3: Identify and protect sites that have conservation value for biodiversity using evidence-based research.
- Objective 4: Monitor and conserve legally protected species within Dublin City, particularly those listed in the annexes of the EU Birds and Habitats Directive using evidence-based research.
- Objective 5: Prepare and plan for the impacts of climate change on biodiversity.
- Objective 6: Implement measures for species with that have a local biodiversity value or impact local biodiversity.
- Objective 7: Prepare and disseminate information on guidance for development and site management for biodiversity conservation.

2.3 Stages of Appropriate Assessment

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

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

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

- **Stage 1: *Screening*.** The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.
- **Stage 2: *Natura Impact Statement (NIS).*** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site(s) despite mitigation, it can only grant consent after proceeding through stages 3 and 4.
- **Stage 3: *Assessment of alternative solutions***. If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.
- **Stage 4: *Assessment where no alternative solutions exist and where adverse impacts remain***. The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

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

3 AA SCREENING METHODOLOGY

3.1 Guidance

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

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

3.2 Screening Steps

Screening for AA involves the following steps:

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

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

3.3 Desk Study

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

- Information on the network of European Sites, boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at *www.npws.ie*;
- Text summaries of the relevant European sites taken from the respective Standard Data Forms (available at *https://natura2000.eea.europa.eu/*) and Site Synopses (available at *www.npws.ie*);
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.*gis.epa.ie*;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at *www.gsi.ie*;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the Dublin City Council online planning database (DCC, 2024) and the National Planning Database (DHLGH, 2024).

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

3.4 Identification of Relevant European sites

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

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

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

The relevant European sites were identified based on the following:

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

3.5 Assessment of Significant Effects

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

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

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

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

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

3.6 Limitations

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

4 STAGE 1 SCREENING ASSESSMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology, Geology and Hydrogeology

The Site of the Proposed Development is located within the Dodder sub-catchment (*Dodder_SC_010,* the *Dodder_050* sub-basin and the Liffey and Dublin Bay catchment *(Catchment ID_09)* (EPA, 2024).

The closest watercourse to the Proposed Site is the Liffey Estuary Lower (IE_EA_090_0300) approximately 575m to the north of the Site and the Grand Canal Basin (Liffey and Dublin Bay) (IE_09_AWB_GCB) 542M East of the Site (EPA, 2024). The WFD ecological status of the Liffey Estuary Lower for the 2016-2021 period was classed as 'Moderate' and the Grand Canal Basin for the 2016-2021 period was classified as 'Good'. This section of the River Liffey is approximately 4km from the mouth of the river, where it flows into Dublin Bay (IE_EA_090_0000) (EPA, 2024).

The EPA water quality monitoring data for the station on the River Liffey (IE_EA_09L010850) located closest to the Site is summarised in Table 1. The reported Q-value results indicate that the water quality in the River Liffey in the point closest to the Site is 'Moderate'. The EPA data indicates that the lack of pollution sensitive macroinvertebrate fauna and dominance of pollution tolerant taxa were the main drivers of Q-value for the watercourse for the period 2016-2021 in this area. (EPA, 2024).

TABLE 2: EPA MONITORING STATIONS AND ASSIGNED Q VALUES

EPA Monitoring Station name	Station Code	Location from Site	Distance from Site	Assigned Q value
LIFFEY - Talbot Br	RS09L013200	West upstream	767m	3 "Moderate"
LIFFEY- Islandbridge-UCD Boat Club	RS09L012400	West upstream	4.8km	3 "Poor"

The Site of the Proposed Development is situated on the Dublin groundwater body (IE_EA_G_008), which is classed as being of 'Good' quality for the survey period 2016-2021. The bedrock aquifer identified beneath the Site is mapped as "Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones" (EPA, 2024). The Groundwater Vulnerability Rating assigned to groundwater beneath the Site is mapped as "*Low"* (L).

The soil beneath the majority of the Site is mapped as "Urban – soil concreted over" and the subsoil at the Site is mapped as *man-made* (EPA, 2024), to be expected within Dublin City.

The Waterbody Status for river, groundwater, transitional and coastal water bodies relevant to the Site as recorded by the EPA (2023) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003), Part IV of the European Communities Environmental Objectives (Surface Waters) Regulations 2009 and Part IV of the European

Communities Environmental Objectives (Groundwater) Regulations 2010, are provided in Table 3.

TABLE 3. 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						
Liffey Estuary Lower	IE_EA_090_0300	North	0.58	Moderate	At risk	None
Grand Canal Basin (Liffey and Dublin Bay)	IE_09_AWB_GCB	East	0.54	Good	Not At risk	None
Coastal Water Bodies						
Dublin Bay	IE_EA_090_0000	East	4.8	Good	Not at Risk	Indirect hydrological connection via waste water connection to Ringsend WwTP
Groundwater Bodies						
Dublin Groundwater Body	IE_EA_G_008	N/A	N/A	Good	Review	Underlying groundwater-body

4.2 Identification of Relevant European Sites

4.2.1 Potential Sources of Impacts

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

Construction Phase (*Estimated duration: 18 to 24 months*)

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

Operational Phase *(Estimated duration: Indefinite)*

- Surface water drainage from the Site of the Proposed Development;

- Foul water from the Proposed Development;
- Increased lighting at the Site and in the vicinity emitted from the Proposed Development.
- Potential collision risk associated with the proposed buildings at the Site.

4.2.2 Potential Pathways to European Sites

For the above listed potential sources of effects to have the potential to cause likely significant effects on any European site, a pathway between the source of potential effects (i.e., the Site of the Proposed Development) and the receptor is required. Potential impact pathways are discussed in the following sections in the context of the identified impact sources as identified in section 4.2.1.

4.2.2.1 Direct Pathways

4.2.2.1.1 Hydrological pathways

The Site is located 545m from the Liffey Estuary Lower. There is no likely significant impact of surface water run-off from the site into the nearest watercourses due to the intervening distance and the city landscape in between the site and the Liffey Estuary Lower.

The surface water drainage from the Site will be captured in attenuation tanks with a restricted flow, controlled by hydrobrakes, before draining into the existing public combined sewer. The combined sewer discharges to Ringsend Wastewater Treatment Plant (WwTP) where the water is treated before being discharged to Dublin Bay. The WwTP is currently undergoing significant upgrades to its capacity and had a comprehensive Environmental Impact Assessment Report (EIAR) prepared for it in 2018 (IW, 2018). The Biodiversity Chapter of this EIAR outlines the extent of the ZoI of the effluent from the WwTP as an area between the retaining walls of Dublin Bay (i.e., Poolbeg Wall and North Bull Island Wall), an area within the inner part of Dublin Bay at Clontarf, the Blue Lagoon west of Bull Island, and a small section of open sea to the southeast of Bull Island (IW, 2018). Thus, there is a potential direct hydrological pathway to the European sites within the northern part of Dublin Bay:

- North Dublin Bay SAC (*c.* 4.47km N of the Permitted Development),
- North Bull Island SPA (*c.* 4.77km N of the Permitted Development), and
- North West Irish Sea SPA (c. 6.72km N of the Permitted Development).

Other European sites within Dublin Bay, namely South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA (both *c.* 2.23km north of the Permitted Development) and Rockabill to Dalkey Island SAC (*c.* 10.44km E of the Permitted Development) lie to the south and east of the effluent discharge point and have a potential hydrological connection. However, these sites are outside of the identified ZoI of effluent discharged from the WwTP as per the EIAR (IW, 2018).

Both the foul water and surface water will have onsite treatment prior to the connection to the combined sewer, and will be intercepted and treated at Ringsend WwTP, therefore any potential pollutants that may enter the Dublin Bay via drainage from the Site would be captured and treated. The Proposed Development is located at an existing residential apartment block that has a connection to the combined public sewer, therefore a hydrological pathway at this Site has already been established via the previous development.

More information and consideration of the possible in combination effects arising from Ringsend WwTP is considered in section 4.3.6.3

4.2.2.1.2 Hydrogeological pathways

There are no groundwater sensitive habitats or species in the vicinity of the proposed development. The Proposed Development has no direct interaction with the groundwater at the Site. It is therefore considered that the likely ZOI via hydrogeological pathways is limited to the immediate habitats, given the low permeability and local productivity of the underlying aquifer, man-made nature of the soils on which the Site is situated, it can be determined that there are no European sites connected to the Proposed Development via this pathway.

4.2.2.1.3 Air and land pathways

The Site is a minimum distance of ca. 2.23km from South Dublin Bay and River Tolka Estuary and ca. 2.28km from South Dublin Bay SAC. No European sites are linked to the Site via air and land pathways, given the already high baseline disturbance in this urban location and the separation distance between the Proposed Site and designated sites. Additionally, the Site does not hold habitat suitable for any of the mobile SCI species of South Dublin Bay and River Tolka Estuary SPA.

No direct impact pathways via air and land exist between the Proposed Development and the European sites due to the size, distance and nature of the development.

4.2.2.1.4 In-flight Collisions between SCI Birds and Buildings

The presence of new buildings of up to 4-7no. storeys in height will change the baseline environment for bird species in flight over the Site which could pose a potential collision risk for birds commuting back and forth from the coast to inland feeding sites. Given the presence of existing high-rise structures in the vicinity of the site which precludes interruptions to flight paths above the existing baseline at the Site, and the separation distance between the Proposed Site and the European designated sites, this is unlikely to occur in any significant manner. The likelihood of in-flight collisions is discussed in Section 4.3.4.1.

4.2.3 Relevant European sites

As outlined in section 4.22 above, a European site will only be at risk from likely significant effects where a S-P-R link exists between the Permitted Development Site and the European site. All of the European sites considered under the S-P-R method are listed in Table 3 and illustrated in Figure 4. Three European sites were identified to have a S-P-R link of note to the Permitted Development Site and thus require more in-depth assessment in this report, namely:

- North Dublin Bay SAC (Site Code: 000206);
- North Bull Island SPA (Site Code: 004006); and
- North West Irish Sea SPA (Site Code: 004236).

These three European sites are highlighted in green in the below table.

TABLE 4. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PERMITTED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. THOSE SITES WITH NOTABLE S-P-R LINKS ARE HIGHLIGHTED IN GREEN (IF ANY).

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Direct distance from Permitted Development	Potential Pathway
Special Areas of Conservation (SAC)			
North Dublin Bay SAC (000206) (NPWS, 2013b)	• Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • *Salicornia* and other annuals colonising mud and sand [1310] • Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330] • Mediterranean salt meadows (*Juncetalia maritime*) [1410] • Embryonic shifting dunes [2110] • Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120] • Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] • Humid dune slacks [2190] • *Petalophyllum ralfsii* (Petalwort) [1395]	***c.*** 4.47km	**Yes** – Potential direct hydrological connectivity via the foul waste system. Wastewater is transported to Ringsend WwTP which discharges treated water into the lower Liffey Estuary.
South Dublin Bay SAC (000210) (NPWS, 2013a)	• Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • *Salicornia* and other annuals colonising mud and sand [1310] • Embryonic shifting dunes [2110]	c. 2.23km	**No** – There is a weak potential hydrological connection network Wastewater is transported to Ringsend WwTP which discharges treated water into the lower Liffey Estuary however this is outside the ZOI for the WwTP. No direct land and air pathways exist.
Rockabill to Dalkey island SAC (003000) (NPWS, 2013c)	• Reefs [1170] • *Phocoena phocoena* (Harbour Porpoise) [1351]	*c.* 10.44km	**No -** There is a weak potential hydrological connection network Wastewater is transported to Ringsend WwTP which discharges treated water into the lower Liffey Estuary however this is outside the ZOI for the WwTP. No

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Direct distance from Permitted Development	Potential Pathway
			direct land and air pathways exist.
Special Protection Areas (SPAs)			
North Bull Island SPA (004006) (NPWS, 2015b)	• Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Shelduck (*Tadorna t*adorna) [A048] • Teal (*Anas crecca*) [A052] • Pintail (*Anas a*cuta) [A054] • Shoveler (*Anas clyp*eata) [A056] • Oystercatcher (*Haematopus ostralegus*) [A130] • Golden Plover (*Pluvialis apricaria*) [A140] • Grey Plover (*Pluvialis squatarola*) [A141] • Knot (*Calidris c*anutus) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*) [A149] • Black-tailed Godwit (*Limosa limosa*) [A156] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Curlew (*Numenius arquata*) [A160] • Redshank (*Tringa 20etanus*) [A162] • Turnstone (*Arenaria interpres*) [A169] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Wetland and Waterbirds [A999]	*c.* 4.77km	**Yes** – Potential indirect hydrological connectivity via the foul waste system. Wastewater from Sandyford area is transported to Ringsend WwTP which discharges treated water into the lower Liffey Estuary (and thus North Bull Island SPA). The greyfield nature of the Permitted Development precludes suitability for any of these SCI species, while the presence of existing high-rise structures precludes interruptions to flight paths above the existing baseline at the Site.
North-west Irish Sea SPA (004236) (NPWS, 2023)	• Red-throated Diver (*Gavia stellata*) [A001] • Great Northern Diver (*Gavia immer*) [A003] • Fulmar (*Fulmarus glacialis*) [A009] • Manx Shearwater (*Puffinus puffinus*) [A013] • Cormorant (*Phalacrocorax carbo*) [A017] • Shag (*Phalacrocorax aristotelis*) [A018] • Common Scoter (*Melanitta nigra*) [A065] • Little Gull (*Larus minutus*) [A177] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Common Gull (*Larus canus*) [A182]	c. 6.72km	**Yes** – Potential direct hydrological connectivity via the foul waste system. Wastewater from Sandyford area is transported to Ringsend WwTP which discharges treated water into the lower Liffey Estuary. The greyfield nature of the Permitted Development precludes suitability for any of these SCI species, while the presence of existing

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Direct distance from Permitted Development	Potential Pathway
	• Lesser Black-backed Gull (*Larus fuscus*) [A183] • Herring Gull (*Larus argentatus*) [A184] • Great Black-backed Gull (*Larus marinus)* [A187] • Kittiwake (*Rissa tridactyla*) [A188] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Little Tern (*Sterna albifrons*) [A195] • Guillemot (*Uria aalge*) [A199] • Razorbill (*Alca torda*) [A200] • Puffin (*Fratercula arctica*) [A204]		high-rise structures precludes interruptions to flight paths above the existing baseline at the Site.
South Dublin Bay and River Tolka Estuary SPA (004024) (NPWS, 2015a)	• Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Oystercatcher (*Haematopus ostralegus*) [A130] • Ringed Plover (*Charadrius hiaticula*) [A137] • Grey Plover (*Pluvialis squatarola*) [A141] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*) [A149] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Redshank (*Tringa totanus*) [A162] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193 • Arctic Tern (*Sterna paradisaea*) [A194] • Wetland and Waterbirds [A999]	*c. 2.23*km	**No -** There is a weak potential hydrological connection network Wastewater is transported to Ringsend WwTP which discharges treated water into the lower Liffey Estuary however this is outside the ZOI for the WwTP. No direct land and air pathways exist. The greyfield nature of the Permitted Development precludes suitability for any of these SCI species, while the presence of existing high rise structures precludes interruptions to flight paths above the existing baseline at the Site.

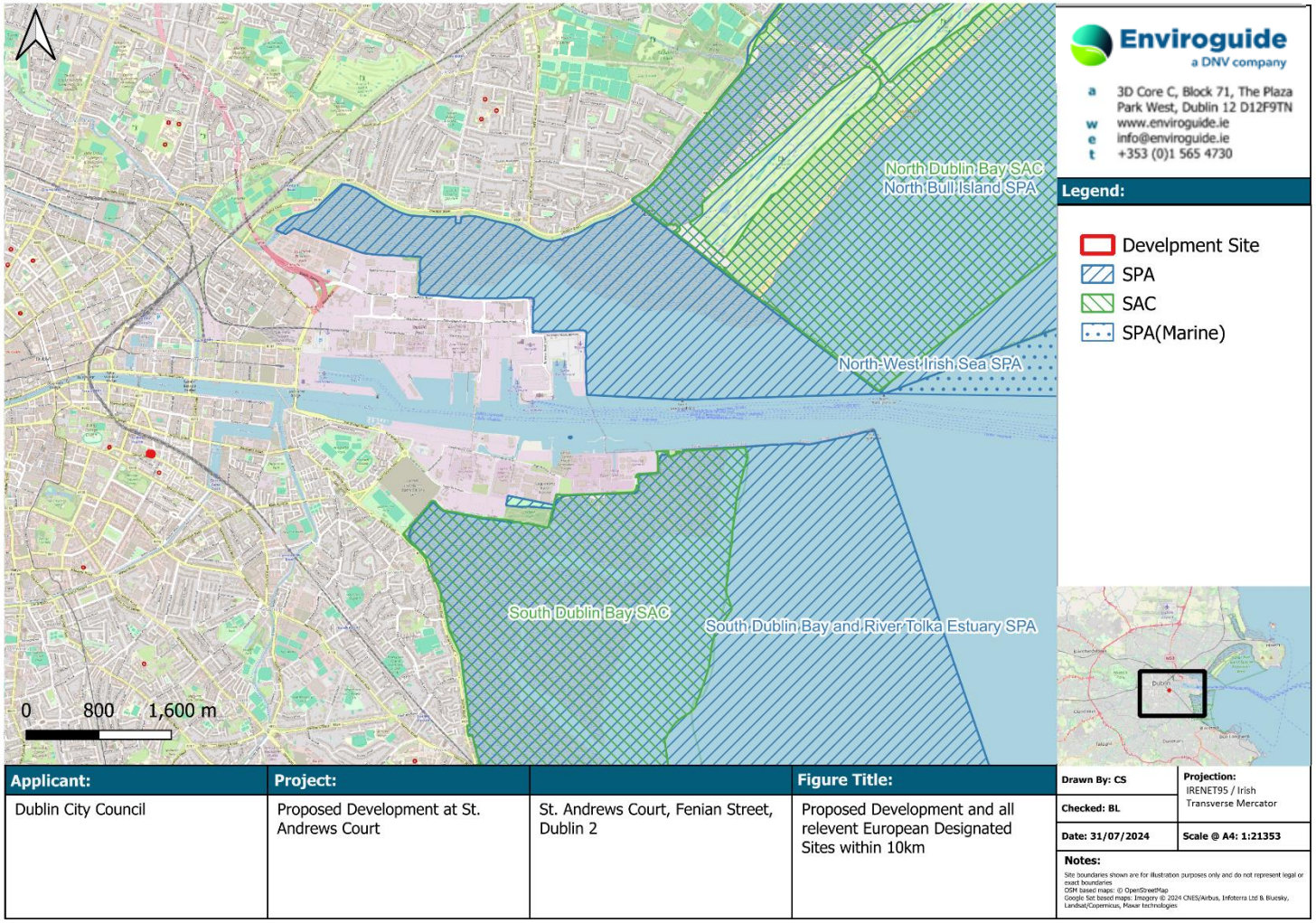

FIGURE 4. LOCATION OF EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT

4.2.3.1 North Dublin Bay SAC (000206)

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

"*This site covers the inner part of north Dublin Bay, the seaward boundary extending from the Bull Wall lighthouse across to the Martello Tower at Howth Head. The North Bull Island is the focal point of this site.*

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

About 1 km from the tip of the island, a large dune slack with a rich flora occurs, usually referred to as the 'Alder Marsh' because of the presence of Alder trees (Alnus glutinosa). The water table is very near the surface and is only slightly brackish. Saltmarsh Rush (Juncus maritimus) is the dominant species, with Meadowsweet (Filipendula ulmaria) and Devil's-bit Scabious (Succisa pratensis) being frequent. The orchid flora is notable and includes Marsh Helleborine (Epipactis palustris), Common Version date: 12.08.2013 2 of 3 000206_Rev13.Doc Twayblade (Listera ovata), Autumn Lady's-tresses (Spiranthes spiralis) and Marsh Orchids (Dactylorhiza spp.).

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

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

The island shelters two intertidal lagoons which are divided by a solid causeway. The sediments of the lagoons are mainly sands with a small and varying mixture of silt and clay. The north lagoon has an area known as the "Salicornia flat", which is dominated

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

Three rare plant species which are legally protected under the Flora (Protection) Order, 1999 have been recorded on the North Bull Island. These are Lesser Centaury (Centaurium pulchellum), Red Hemp-nettle (Galeopsis angustifolia) and Meadow Saxifrage (Saxifraga granulata). Two further species listed as threatened in the Red Data Book, Wild Clary/Sage (Salvia verbenaca) and Spring Vetch (Vicia lathyroides), have also been recorded. A rare liverwort, Petalophyllum ralfsii, was first recorded from the North Bull Island in 1874 and has recently been confirmed as still present. This species is of high conservation value as it is listed on Annex II of the E.U. Habitats Directive. The North Bull is the only known extant site for the species in Ireland away from the western seaboard. Version date: 12.08.2013 3 of 3 000206_Rev13.Doc North Dublin Bay is of international importance for waterfowl. During the 1994/95 to 1996/97 period the following species occurred in internationally important numbers (figures are average maxima): Brent Goose 2,333; Knot 4,423; Bar-tailed Godwit 1,586. A further 14 species occurred in nationally important concentrations - Shelduck 1505; Wigeon 1,166; Teal 1,512; Pintail 334; Shoveler 239; Oystercatcher 2,190; Ringed Plover 346; Grey Plover 816; Sanderling 357; Dunlin 6,238; Black-tailed Godwit 156; Curlew 1,193; Turnstone 197 and Redshank 1,175. Some of these species frequent South Dublin Bay and the River Tolka Estuary for feeding and/or roosting purposes (mostly Brent Goose, Oystercatcher, Ringed Plover, Sanderling and Dunlin).

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

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

The main land uses of this site are amenity activities and nature conservation. The North Bull Island is the main recreational beach in Co. Dublin and is used throughout the year. Much of the land surface of the island is taken up by two golf courses. Two separate Statutory Nature Reserves cover much of the island east of the Bull Wall and the surrrounding intertidal flats. The site is used regularly for educational purposes. North Bull Island has been designated a Special Protection Area under the E.U. Birds

Directive and it is also a statutory Wildfowl Sanctuary, a Ramsar Convention site, a Biogenetic Reserve, a Biosphere Reserve and a Special Area Amenity Order site. This site is an excellent example of a coastal site with all the main habitats represented.

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

4.2.3.2 North Bull Island SPA (004006)

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

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

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

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Light-bellied Brent Goose, Shelduck, Teal, Pintail, Shoveler, Oystercatcher, Golden Plover, Grey Plover, Knot, Sanderling, Dunlin, Black-tailed Godwit, Bar-tailed Godwit, Curlew, Redshank, Turnstone and Black-headed Gull. The site is also of special conservation interest for holding an assemblage of over 20,000 wintering waterbirds. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

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

and Black-headed Gull (2,196). The populations of Pintail and Knot are of particular note as they comprise 14% and 10% respectively of the all-Ireland population totals. Other species that occur regularly in winter include Grey Heron, Little Egret, Cormorant, Wigeon, Goldeneye, Red-breasted Merganser, Ringed Plover and Greenshank. Gulls are a feature of the site during winter and, along with the nationally important population of Black-headed Gull (2,196), other species that occur include Common Gull (332) and Herring Gull (331). While some of the birds also frequent South Dublin Bay and the River Tolka Estuary for feeding and/or roosting purposes, the majority remain within the site for much of the winter. The wintering bird populations have been monitored more or less continuously since the late 1960s and the site is now surveyed each winter as part of the larger Dublin Bay complex.

The North Bull Island SPA is a regular site for passage waders, especially Ruff, Curlew Sandpiper and Spotted Redshank. These are mostly observed in single figures in autumn but occasionally in spring or winter.

The site formerly had an important colony of Little Tern but breeding has not occurred in recent years. Several pairs of Ringed Plover breed, along with Shelduck in some years. Breeding passerines include Skylark, Meadow Pipit, Stonechat and Reed Bunting. The island is a regular wintering site for Short-eared Owl, with up to 5 present in some winters.

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

4.2.3.3 North West Irish Sea SPA (004236)

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

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

This SPA extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km2 in area. This SPA is ecologically connected to several existing SPAs in this area.

Informed by two surveys of the western Irish Sea region in 2016 an estimated 120,232 and 34,626 individual marine birds occurred in this SPA during autumn and winter respectively. Those marine bird species whose estimated abundances equalled or

exceeded 1% of the total estimated size of the winter assemblage are: Red-throated Diver (538), Fulmar (506), Little Gull (391), Kittiwake (944), Black-headed Gull (508), Common Gull (2,866), Herring Gull (6,893), Great Black-backed Gull (2,096), Razorbill (4,638) and Guillemot (13,914).

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

4.2.3.4 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the relevant European sites are detailed in Table 5 below.

TABLE 5. 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) (EEA, 2023) AND THE BIRDS OF CONSERVATION CONCERN IRELAND 4 (GILBERT ET AL. 2021).

QI / SCI (* = priority habitat)	Conservation Status (Grade A, B, C)[1] (non-birds) OR BoCCI Status (birds)	Conservation Objective
Special Areas of Conservation (SACs)		
North Dublin Bay SAC (000206)		
Mudflats and sandflats not covered by seawater at low tide [1140]	B	To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.
Annual vegetation of drift lines [1210]	B	To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.
Salicornia and other annuals colonising mud and sand [1310]	A	
Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330]	B	To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.
Mediterranean salt meadows (*Juncetalia maritimi*) [1410]	B	
Embryonic shifting dunes [2110]	A	To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.

[1] Natura 2000 – Standard Data Form for South Dublin Bay SAC and South Dublin Bay & River Tolka SPA. Available at: https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=IE0000210 [Accessed July 2024]. Grades: A = Excellent conservation; B = Good conservation; C = Average or Reduced conservation.

QI / SCI (* = priority habitat)	Conservation Status (Grade A, B, C)[1] (non-birds) OR BoCCI Status (birds)	Conservation Objective
Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]	B	
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	A	
Humid dune slacks [2190]	A	
Petalophyllum ralfsii (Petalwort) [1395]	N/A	To maintain the favourable conservation condition of Petalwort in North Dublin Bay SAC.
Special Protection Areas		
North Bull Island SPA (004006)		
Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]	Amber	To maintain the favourable conservation condition of this SCI species within North Bull Island SPA.
Shelduck (*Tadorna tadorna*) [A048]	Amber	
Teal (Anas crecca) [A052]	Amber	
Pintail (Anas acuta) [A054]	Amber	
Shoveler (Anas clypeata) [A056]	Red	
Oystercatcher (Haematopus ostralegus) [A130]	Red	
Golden Plover (Pluvialis apricaria) [A140]	Red	
Grey Plover (Pluvialis squatarola) [A141]	Red	
Knot (Calidris canutus) [A143]	Red	
Sanderling (Calidris alba) [A144]	Green	

QI / SCI (* = priority habitat)	Conservation Status (Grade A, B, C)[1] (non-birds) OR BoCCI Status (birds)	Conservation Objective
Dunlin (Calidris alpina) [A149]	Red	
Black-tailed Godwit (Limosa limosa) [A156]	Red	
Bar-tailed Godwit (Limosa lapponica) [A157]	Red	
Curlew (Numenius arquata) [A160]	Red	
Redshank (Tringa totanus) [A162]	Red	
Turnstone (Arenaria interpres) [A169]	Amber	
Black-headed Gull (Chroicocephalus ridibundus) [A179]	Amber	
Wetland and Waterbirds [A999]	N/A	To maintain the favourable conservation condition of the wetland habitat in North Bull Island SPA as a resource for the regularly occurring migratory waterbirds that utilise it.
North West Irish Sea SPA (004236)		
Red-throated Diver (*Gavia stellata*) [A001]	Amber	To maintain the favourable conservation condition of these SCI species within North West Irish Sea SPA.
Great Northern Diver (*Gavia immer*) [A003]	Amber	
Fulmar (*Fulmarus glacialis*) [A009]	Amber	To restore the favourable conservation condition of this SCI species within North West Irish Sea SPA.
Manx Shearwater (*Puffinus puffinus*) [A013]	Amber	To maintain the favourable conservation condition of this SCI species within North West Irish Sea SPA.
Cormorant (*Phalacrocorax carbo*) [A017]	Amber	To restore the favourable conservation condition of these SCI species within North West Irish Sea SPA.
Shag (*Phalacrocorax aristotelis*) [A018]	Amber	

QI / SCI (* = priority habitat)	Conservation Status (Grade A, B, C)[1] (non-birds) OR BoCCI Status (birds)	Conservation Objective
Common Scoter (*Melanitta nigra*) [A065]	Red	To maintain the favourable conservation condition of these SCI species within North West Irish Sea SPA.
Little Gull (*Larus minutus*) [A177]	Amber	
Black-headed Gull (*Chroicocephalus ridibundus*) [A179]	Amber	
Common Gull (*Larus canus*) [A182]	Amber	
Lesser Black-backed Gull (*Larus fuscus*) [A183]	Amber	
Herring Gull (*Larus argentatus*) [A184]	Amber	To restore the favourable conservation condition of this SCI species within North West Irish Sea SPA.
Great Black-backed Gull (*Larus marinus*) [A187]	Green	To maintain the favourable conservation condition of this SCI species within North West Irish Sea SPA.
Kittiwake (*Rissa tridactyla*) [A188]	Red	To restore the favourable conservation condition of this SCI species within North West Irish Sea SPA.
Roseate Tern (*Sterna dougallii*) [A192]	Amber	To maintain the favourable conservation condition of these SCI species within North West Irish Sea SPA.
Common Tern (*Sterna hirundo*) [A193]	Amber	
Arctic Tern (*Sterna paradisaea*) [A194]	Amber	
Little Tern (*Sterna albifrons*) [A195]	Amber	
Guillemot (*Uria aalge*) [A199]	Amber	
Razorbill (*Alca torda*) [A200]	Red	
Puffin (*Fratercula arctica*) [A204]	Red	To restore the favourable conservation condition of this SCI species within North West Irish Sea SPA.

4.3 Assessment of Likely Significant Effects

The following sections discuss the potential for likely significant effects on the relevant European sites, taking into consideration the QIs and SCIs, and assesses whether the remaining works and Operational Phase of the Permitted Development has the capacity to adversely affect the integrity of these European sites. The potential for significant effects that may arise from the Permitted Development was considered through the use of key indicators as detailed in section 4.2.

4.3.1 Habitat Loss and Alteration

As the site is not located within or immediately adjacent to any designated sites, No direct habitat loss and/or alteration is expected as a result of the Proposed Development, given the absence of QI habitats within the Site of the Proposed Development and lack of suitable habitat to support QI / SCI species within the Site. Habitat loss and alteration may also occur as an indirect effect via water quality deterioration; changes to water quality as a result of the Proposed Development are discussed in detail in section 4.3.3 below.

4.3.2 Habitat / Species Fragmentation

No direct habitat or species fragmentation is expected as a result of the Proposed Development for the same reasons as those outlined above in section 4.3.1. Habitat or species fragmentation may also occur as an indirect effect via water quality deterioration. The potential for water quality deterioration is discussed in detail in section 4.3.3 below.

4.3.3 Changes in Water Quality and Resource

During the operational phase of the Permitted Development, the apartments will be connected to the existing combined public sewer, which is treated at Ringsend WwTP before being discharged into Dublin Bay, constituting a hydrological connection between the Site and three European sites, namely North Dublin Bay SAC (000206), North Bull Island SPA (004006), and North West Irish Sea SPA (004236). Given the assimilative capacity of the marine environment of Dublin Bay, the treatment at Ringsend WwTP and the addition of the onsite treatment of water prior to the connection to the public sewer, there is a considerable dilution factor between the site and the European sites. Any potentially adverse impacts from the Proposed Development would not be significant.

The Proposed Development is located at the site of a derelict residential apartment block with an existing connection to the combined public sewer and is of a similar size and capacity. Therefore, the Proposed Development will not overload the system, and lead to the release of untreated water into Dublin Bay. Thus, in the absence of mitigation, any effects on the QIs/SCIs of the relevant European Sites **would not be significant.**

4.3.4 Disturbance and / or Displacement of Species

No direct disturbance and/or displacement of species is expected as a result of the Proposed Development. Disturbance an/or displacement of species may also occur as

an indirect effect via water quality deterioration. The potential for water quality deterioration is discussed in detail above in section 4.3.3.

4.3.4.1 In-flight Collisions with Buildings

Due to the distance between the Proposed Development and the European designated sites, and the urban setting of the proposed development, in-flight collisions between SCI species and the Proposed Development are not deemed to pose a source of likely significant effects to the conservation objectives of the relevant SPAs. The Proposed Development entails a max height of 4-7 storeys (maximum 31.43m) in height (O'Donnel & Tuomey, 2024). Birds that commute across the city or in order to reach feeding grounds at various locations would tend to fly above this height and once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds flying in the vicinity of the buildings will simply fly around or over them.

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

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

As such, based on the lack of any significant flightlines identified over the Site, the heights at which the majority of birds recorded over the Site were flying at, as well as the insignificant heights of the proposed structures and their physical appearance, it is deemed that SCI bird species do not have the potential to be significantly effected by the Proposed Development through in-flight collisions. While the presence of the Proposed Development might alter flight patterns of bird species slightly to avoid the proposed building structures, the risk of collision is deemed to be extremely low. This impact would not result in any population level effect or change in distribution of any species, including any SCI species for SPAs within the ZOI of the Proposed Development. The potential for likely significant effects relating to disturbance/displacement via bird – building collisions is **therefore screened out at this stage.**

4.3.5 Changes in Population Density

No direct changes to the population density of any species is expected as a result of The Proposed Development. Changes to the population density of species may also occur as an indirect effect via water quality deterioration. The potential for water quality deterioration is discussed in detail above in section 4.3.3.

4.3.6 Potential for In-combination Effects

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

4.3.6.1 Existing Planning Permissions

A search of planning applications located within a 100m 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 Dublin City Council Planning Applications online map. Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

It is noted that the majority of the few developments within the vicinity of the Site of the Proposed Development are applications granted for retention, extensions and/or modifications of existing structures. The larger developments in the vicinity of the Proposed Development are outlined in Table 6.

TABLE 6. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 100 M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
3861/24	**Dublin City Council**	**Registered Application**	**62-64, Fenian Street, Nos. 2,3,4,9,10 & 11 Bass Place and, Nos. 1-3 Sandwith Street Upper, Dublin 2**
Development Description This development is a revision to the previously granted reg. ref. 3164/23, including: Extending the application site from c.0.183ha to c. 0.190 ha, which now includes for the demolition of 11 Bass place an end of terrace 2 Storey house in addition to those previously granted permission for demolition and replacing the previously granted 3 storey, Block 2 aspect, which incorporated a gym / yoga studio, with a larger footprint 3 storey residential block providing 8 one bed apartments with balconies facing north west, west and south, and a ground floor garden / balcony to the east. Accordingly, omission of Condition 5 referring to the yoga / gym use of this block is also sought. Modifications are sought to the ground, basement, 6th floor and roof terrace of Block 1 to include the relocation of the bin store serving all blocks to the basement / lower ground (19.5sqm) together with a new backup generator room (20sqm) for the life safety systems, provision at ground floor of a gym facility			

facing Bass Place and a coffee / retail outlet to the south west corner facing Fenian Street, provision of an additional one bedroom apartment at ground floor facing Bass Place with a western facing balcony and relocation of the ESB Substation & switch room from the western façade at Bass Place to the eastern façade laneway, including minor layout alterations to the previously granted one bedroom ground floor apartment and eastern facing balcony on the eastern façade. Proposed minor increase to the 6th floor area (additional 12sqm) to facilitate provision of a 3 bedroom and 1 bedroom apartment in the area previously proposing two 2 bedroom apartments. Accordingly the omission of condition 4 is also sought. Minor revision to the roof terrace of Block 1 to include a cold water storage tank and ancillary plant. Modifications and minor extension at ground (7.65sqm) first floor (5.4sqm) & second floor (2.5sqm) to Block 3 together with replacement of the ground floor Bin and Bicycle store with a new 1 bedroom apartment with a south facing balcony. A new total of 82 apartments is proposed, consisting of 65 units in Block 1 (consisting of 27 one bedroom, 37 two bedroom & 1 three bedroom units) 8 one bedroom apartments in Block 2 and 9 apartments in Block 3 (consisting of 4 one bedroom, 3 two bedroom & 2 three bedroom units). Together with minor modifications to the public and communal open space areas. All at 62-64, Fenian Street, Nos. 2,3,4,9,10 & 11 Bass Place and Nos. 1-3 Sandwith Street Upper, Dublin.

Potential for In-combination effects

There are no potential in-combination impacts between the Proposed Development sites and European designated sites due to the lack of S-P-R links, and the distance, small-scale and nature of the proposed developments. Both proposals include demolition of existing buildings, however the different timings of works in addition to the >3km distance of the designated sites and waterways is sufficient in ruling out the combination of impacts from the demolition works.

3080/19	**Dublin City Council**	**Permission granted.**	**Corner of Sandwith Street and Boyne Street, Dublin 2**

Development Description

Planning permission to demolish the existing 397sqm single-storey industrial building and construction of 28 apartments in a seven-storey apartment building containing 22 no. two-bedroom units and 6 no. one-bedroom unit with private balconies facing west and south over ground floor containing entrance, bike storage, refuse storage, private garden and commercial office/gym, all with associated works.

Potential for In-combination effects

There are no potential in-combination impacts between the Proposed Development sites and European designated sites due to the lack of S-P-R links, and the distance, small-scale and nature of the proposed developments. Both proposals include demolition of existing buildings, however the different timings of works in addition to the >3km distance of the designated sites and waterways is sufficient in ruling out the combination of impacts from the demolition works..

4018/24	**Dublin City Council**	**Registered Application**	**Hospitality House , 16-20 Cumberland Street, Dublin 2 D02Y097 & Alex Hotel , 41-47 Fenian Street, Dublin 2 D02H678**

Development Description

Permission for 16-20 Cumberland Street South, Dublin 2, D02Y097 and 41- 47 Fenian Street, Dublin 2, D02H678. The development will consist of the demolition of the existing

'Hospitality House' building (c.3059sqm), the construction of a new hotel extension building (c.9530sqm gross area with maximum height of 33.375m), comprising of an 8-story over ground floor level hotel extension and conference rooms with a lower ground level for hotel services, the relocated ESB sub-station and switch room accessed from Cumberland Street South, and the refurbishment of ground and lower ground levels of the existing hotel building (c.1169sqm). The proposed hotel and conferencing extension includes, at Lower Ground floor: Staff Facilities (325sqm), Spa (248sqm), Bicycle store (70sqm) Bin Store (60sqm), Storage (105sqm); at Ground Floor: Dining (469sqm), Kitchens (195sqm), Storage (55sqm) , Conferencing (333sqm), planted areas (147sqm), Sub-station and Switch- room (28sqm); at Upper floor levels 1 to 8: 150 bedrooms and associated ancillary rooms (5437sqm), upper planted areas (685sqm); to include drainage and all ancillary works on 0.32 hectare site.

Potential for In-combination effects
There are no potential in-combination impacts between the Proposed Development sites and European designated sites due to the lack of S-P-R links, and the distance, small-scale and nature of the proposed developments. Both proposals include demolition of existing buildings, however the different timings of works in addition to the >3km distance of the designated sites and waterways is sufficient in ruling out the combination of impacts from the demolition works.

4.3.6.2 Relevant Policies and Plans

The local policies and plans detailed in section 2.2 above were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA, and where potential for likely significant effects has been identified (e.g., in the case of the Dublin City 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 Dublin City Development Plan 2022-2028 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

4.3.6.3 Operations at Ringsend WwTP

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

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

The 2012 Ringsend WwTP application for planning permission (Ref. PL.29N.YA0010) was for a PE of 2.4 million and was predicated on the findings of the 2005 GDSDS. The GDSDS set out the drainage requirements for the Greater Dublin Area (GDA) up to 2031. The GDSDS relied on the Regional Planning Guidelines (RPGs) and the National Spatial Strategy (NSS) in order to estimate the future projected population increases for the GDA. The studies indicated a predicted growth in population from 1.2 million in 2002 to just over 2 million in 2031 for the GDA region.

In June 2018 Irish Water applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WwTP facility. The first phase of upgrade

works to Ringsend WWTP was completed in December 2021, which increased the capacity of the plant by 400,000 P.E. These works, together with the future works permitted will ultimately increase the capacity of the facility from 1.6 million P.E. to 2.4 million P.E. by 2025 (Irish Water website: https://www.water.ie/projects/local-projects/ringsend/).

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

Notwithstanding the above, on an individual basis the operational phase of the Permitted Development will have an imperceptible effect on the habitats/species/qualifying interests listed within the relevant European sites, in terms of flows, relative to the total amount of wastewater currently being received at Ringsend WwTP.

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

"*In the operational phase, the proposed upgrade of the Ringsend WwTP Component will result in an increase in the plant capacity and also an improvement in the final effluent quality. This will result in a reduction in the licensed parameters discharged into the receiving water, with significantly reduced quantities in respect of ammonia and phosphorous*."[2]

This NIS goes on to state as follows:

"*Overall no significant adverse effects on are foreseen and indeed, a slight positive effect is possible. Effects of discharge during the operational phase of the project from the upgrade project will therefore have imperceptible impact on habitats listed within these European sites*."[3]

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

"*Thus, there is no potential for in-combination impacts of any other plan and project with the Ringsend WwTP Component of the proposed Upgrade Project*."[4]

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

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

[2] Section 4.5.1 at page 32.
[3] Section 4.5.1 at page 33.
[4] Section 4.5.1 at page 34

adjacent to Dublin Bay, or any of their Conservation Objectives regardless of said upgrade.

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

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

It is therefore concluded that there is no possibility for any significant in-combination effects to European sites involving the Permitted Development.

TABLE 7. SUMMARY OF IMPACT ASSESSMENT ON EUROPEAN SITES AS A RESULT OF THE PROPOSED DEVELOPMENT.

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
North Dublin Bay SAC 000206	No	No	No	None	None	None	NO
SPA							
North Bull Island SPA 004006	No	No	No	None	None	None	NO
North West Irish Sea SPA 004236	No	No	No	None	None	None	NO

5 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at St Andrews Court, Fenian Street, Dublin 2 has been assessed taking into account:

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

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

- North Dublin Bay SAC (Site Code: 000206);
- North Bull Island SPA (Site Code: 004006); and
- North West Irish Sea SPA (Site Code: 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, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required.

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