



**Ecological Survey & Appropriate Assessment Screening Report:  
Proposed Development at  
Kildonan - West Finglas Community Park, Dublin 11**

**Prepared for Dublin City Council.**

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# 1. INTRODUCTION

## 1.1 Proposed works at Kildonan Park

Works are proposed at Kildonan Park, Dublin 11. It is planned by Dublin City Council for an all-weather pitch, grass pitches of various sizes, provision for additional active recreational amenities for wider use of people, play area, additional paths, trees and wildflower planting, benches, bike stands and art elements.

The following report has been completed to provide information regarding the ecological status of the proposed site of works. The report includes a general ecological assessment of the site and the surrounding area, including designated sites. This report has also been completed to provide the information necessary to allow the competent authority to conduct an Article 6[3] Appropriate Assessment (AA) Screening of the proposed development. The legislation and methodology for which is detailed in the following sections below.

Following this Appropriate Assessment screening, it has been concluded that no impacts are likely as a result of the proposed development on the conservation objectives or overall integrity of any Natura 2000 Site. **Therefore, Stage 2 Appropriate Assessment is not required.**

## 1.2 Relevant legislation and overall screening methodology

The methodology for this screening statement is clearly set out in a document prepared for the Environment DG of the European Commission entitled ‘Assessment of plans and projects significantly affecting Natura2000 sites: methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC’ (Oxford Brooks University, 2001). This report and any contributory fieldwork were carried out in accordance with guidelines given by the Department of Environment, Heritage and Local Government (2009, amended 2010).

The process is given in Articles 6(3) and 6(4) of the Habitats Directive and is commonly referred to as ‘*Appropriate Assessments*’ (which in fact refers to Stage 2 in the sequence under the Habitats Directive Article 6 assessment). Article 6 of the Habitats Directive sets out provisions which govern the conservation and management of Natura 2000 sites. Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment. *“Any plan or project not directly connected with or necessary to the management of the (Natura2000) site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implication 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.”*

Article 6(4) of the same directive states:

*“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from*

*the Commission, to other imperative reasons of overriding public interest.”*

It is the responsibility of the proponent of the plan or project to provide the relevant information (ecological surveys, research, analysis etc.) for submission to the ‘competent national authority’. Having satisfied itself that the information is complete and objective, the competent authority will use this information to screen the project, i.e. to determine if an AA is required and to carry out the AA, if one is deemed necessary. The competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned. The appropriate assessment process has four stages. Each stage determines whether a further stage in the process is required. If, for example, the conclusions at the end of Stage One are that there will be no significant impacts on the Natura 2000 site, there is no requirement to proceed further. The four stages are:

1. Screening to determine if an appropriate assessment is required
2. Appropriate assessment
3. Consideration of alternative solutions
4. Imperative Reasons of Overriding Public Interest/Derogation

### ***Stage 1. Screening***

This is to determine if an appropriate assessment is required. Screening is the technique applied to determine whether a particular plan would be likely to have significant effects on a Natura 2000 site and would thus warrant an Appropriate Assessment. The key indicator that will determine if an Appropriate Assessment is required is the determination of whether the development is likely to have *significant environmental effects* on a Natura 2000 site or not.

### ***Stage 2. Appropriate Assessment***

This step is required if the screening report indicates that the development is likely to have a significant impact on a Natura 2000 site. Stage 2 assesses the impact of a plan or project on the integrity of the Natura 2000 site, either alone or in combination with other plans or projects, with respect to the site’s structure, function, and conservation objectives. Where there are adverse impacts, an assessment of the potential mitigation of these impacts is also required.

### ***Stage 3. Assessment of Alternative Solutions***

If it is concluded that, subsequent to the implementation of measures, a plan or project will have an adverse impact on the integrity of a Natura 2000 site, it must be objectively concluded that no alternative solutions exist before the plan or project can proceed.

### ***Stage 4. Imperative Reasons of Overriding Public Interest/Derogation***

Where no alternative solutions exist and where adverse impacts remain but imperative reasons of overriding public interest (IROPI) exist for the implementation of a plan or project, an assessment of compensatory measures that will effectively offset the damage to the Natura 2000 site will be necessary.

Flynn Furney Environmental Consultants Ltd has been appointed by Dublin City Council to undertake the first stage of the above process: a screening exercise to determine whether the proposed development has the potential to have any significant or indeterminate impacts on the conservation objectives and overall integrity of any Natura 2000 sites. This assessment is based upon desk study and fieldwork carried out by suitably qualified ecologists. This document includes a detailed description of the development in Section 1.4. The sites within 15km of the proposed development are then reviewed for potential impacts or pathways for impacts. Sections 4 and 5 of the report comprise the AA Screening that specifically focus on the potential for impacts on Natura 2000 sites and their conservation objectives.

### 1.3 The site: Lands at Kildonan Park

The study site is located in the existing Kildonan Park, Finglas, Dublin 11. The Park is bounded to the north and east by Kildonan road, by Mellowes Park to the south and the grounds of the Novas Abigail Centre to the west. The area is dominated by residential housing and small green spaces. It is currently in use as recreational grounds and is home to Finglas United Youth FC, which has a club house, playing pitch and astro-turf pitch in a separate section of Kildonan Park known as Larney Park.

### 1.4 Description of the planned development

#### 1.4.1 Description of the Works

The proposal seeks to keep all the existing boundaries with the exception at the interface with Larney Park/ Finglas United Grounds. which will be removed as part of the park development. Development site works to include:

- Larney Park (the western section of Kildonan Park with Finglas YFC Club House) retained as grass pitch and integrated into the park and is no longer separated, boundary wall is removed.
- All-weather 11-a-side pitch with fence and lighting.
- Potential change existing 5 a side pitch into multi use games area. this would be open to the public within park. table tennis zone added.
- Zones for active recreation bowling and / or tennis.
- Grass areas for passive recreation and football.
- Potential full or half basketball court.
- Potential coffee kiosk added to building or in area.
- Marked running zone for clubs and non-competitive users.
- Potential locations for outdoor nature walks and outdoor class exist within the masterplan area.

Table 1. The consultations carried out to date.

| Stake holder        | Nature of Consultation  | Outcome  |
|---------------------|---|--|
|                     | • Arranging site visit as part of the AA screening process              | • Site visit / assessments completed   |
| Dublin City Council | • Obtaining relevant documents such as Engineering & Flood Risk Reports | • Desktop research carried out<br>• Appropriate Assessment Screening carried out<br>• Non-requirement for a stage 2 Appropriate Assessment (NIS) confirmed |

## 2. ECOLOGICAL ASSESSMENT WORKS

## 2.1 Desktop Study

A desktop study was carried out as part of the screening process. This included a review of available literature on the site and its immediate environs. Sources of information included the National Parks and Wildlife Service and National Biodiversity Data Centre (NBDC) databases on protected sites and species. The site is located within / overlaps with tetrads O13E and O13J (a tetrad being an area of 2km<sup>2</sup>).

A search of the NBDC's online portal (accessed 13/08/2021) returned the following species of high conservation value and concern from within the two tetrads, see Tables 2 and 4.

### 2.1.1 Fauna

None of the species listed in Table 2 and 3 below occur within the footprint of the proposed development.

Table 2. Faunal species of high conservation value/concern from tetrads O13J

| Faunal species of high conservation value / concern from tetrad O13J |                              |        |                     |                |   |
|--|------------------------------|--------|---------------------|----------------|---|
| Species name   | Species name                 | Record | Date of last record | Nearest record | Conservation status   |
| Black-headed Gull  | <i>Larus ridibundus</i>      | 3      | 15/11/2017          | 0.8 km south   | BoCCI Red listed species                                    |
| Brent Goose  | <i>Branta bernicla</i>       | 3      | 27/01/2017          | 1 km south     | BoCCI Amber listed species                                  |
| Herring Gull   | <i>Larus argentatus</i>      | 2      | 11/07/2017          | 0.8 km south   | BoCCI Red listed species                                    |
| Soprano Pipistrelle  | <i>Pipistrellus pygmaeus</i> | 1      | 05/09/2006          | 1.6 km east    | EU Habitats Directive Annex IV species. Irish Wildlife Acts |
| Common Frog  | <i>Rana temporaria</i>       | 1      | 22/02/2017          | 0.7 km east    | EU Habitats Directive Annex V species. Irish Wildlife Acts  |

Table 3. Faunal species of high conservation value/concern from tetrads O13E

| Faunal species of high conservation value / concern from tetrad O13E |                                  |        |                     |                |   |
|--|----------------------------------|--------|---------------------|----------------|---|
| Species name   | Species name                     | Record | Date of last record | Nearest record | Conservation status   |
| Lesser Noctule   | <i>Nyctalus leisleri</i>         | 1      | 02/08/2005          | 1.3 km south   | EU Habitats Directive Annex IV species. Irish Wildlife Acts                           |
| Common Pipistrelle   | <i>Pipistrellus pipistrellus</i> | 1      | 02/08/2005          | 2.7 km west    | EU Habitats Directive Annex IV species. Irish Wildlife Acts                           |
| Soprano Pipistrelle  | <i>Pipistrellus pygmaeus</i>     | 1      | 02/08/2005          | 1.2 km west    | EU Habitats Directive Annex IV species. Irish Wildlife Acts                           |
| Eastern Grey Squirrel  | <i>Sciurus carolinensis</i>      | 2      | 31/12/2012          | 0.5 km west    | High Impact invasive species. Regulation No. 1143/2014. Regulation S.I. 477 (Ireland) |

The NBDC's online portal (accessed 13/08/2021) returned the following Brent geese records, locations and distances from the Kildonan Park are presented in Table 4 below.

Table 4. Brent Geese records from tetrad O13J and O13I

| Brent geese records in tetrad O13J (site tetrad) and O13I tetrad south of site |           |            |                              |                  |                    |
|--|-----------|------------|------------------------------|------------------|--------------------|
| Grid reference (ITM)   | Abundance | Date       | Location                     | Dataset          | Distance from site |
| O13100 37500   | 12        | 07/12/2016 | Tolka Valley park lower, D11 | Birds of Ireland | 1.75 km (O13I)     |
| O12800 37500   | 50        | 19/12/2016 | Tolka Valley park, D11       | Birds of Ireland | 1.74 km (O13I)     |
| O12900 38500   | 70        | 16/01/2017 | Farnham Crescent Park, D.11  | Birds of Ireland | 1 Km (O13J)        |
| O12900 38600   | 87        | 27/01/2017 | Farnham Crescent Park, D.11  | Birds of Ireland | 1 km (O13J)        |

Brent geese are well-known to feed on recreational grasslands from mid-winter onwards. Recent work as part of a Natura Impact Statement (Scott Cawley, 2017)<sup>1</sup> identified 113 terrestrial inland feeding sites used by Brent geese in Dublin City and its environs from 2012/13 to 2016/17. Seven feeding sites were identified in the vicinity of Kildonan Park; the place names and approximate distances from the proposed development site are presented in Table 5 below.

Table 5. Brent geese feeding sites (Scott Cawley, 2017)

| Brent geese feeding site   | Distance from Kildonan Park |
|----------------------------|-----------------------------|
| Beneavin de la Sal College | 1.7 km east                 |
| Dunsink Road               | 0.85 km south               |
| Erin's Isle GAA            | 1.15 km south               |
| Farnham Park               | 0.9 km south                |
| Gael Scoil Ui Earcain      | 0.15 km south               |
| Johnstown Park             | 1.86 km east                |
| Mellowes Park              | 0.42 km east                |
| Tolka Valley Park          | 1.35 km south               |

### 2.1.2 Flora

No rare or protected plant species were identified on or in the vicinity of the proposed development site. The site is comprised predominantly of amenity grassland and is very unlikely to support rare or protected plant species. None of the species presented in Table 5 occur within the footprint of the proposed development.

#### **Giant Hogweed (*Heracleum mantegazzianum*)**

Giant Hogweed is a Schedule III invasive plant species subject to legal control under the Birds and Habitats Regulations (2011) and has been recorded c 1.54 km to the southwest of the site on the banks of the River Tolka.

<sup>1</sup> Scott Cawley (2017) Natura Impact Statement – Information for Stage 2 Appropriate Assessment. Proposed Residential Development St. Paul's College, Sybil Hill, Raheny, Dublin 5. Scott Cawley Ltd., Dublin.

Table 6. Floral species of high conservation value / concern from tetrads O13J and O13I.

| Floral species of high conservation value / concern from tetrad O13J |                                 |              |                     |                |  |
|--|---------------------------------|--------------|---------------------|----------------|--|
| Species name   | Species name                    | Record count | Date of last record | Nearest record | Conservation status  |
| Butterfly-bush   | <i>Buddleja davidii</i>         | 3            | 26/06/2020          | 0.5 km south   | Medium impact invasive species                             |
| Canadian Fleabane  | <i>Conyza canadensis</i>        | 3            | 26/10/2020          | 0.6 km south   | Medium impact invasive species                             |
| Sycamore   | <i>Acer pseudoplatanus</i>      | 1            | 31/12/1999          | Within 2 km    | Medium impact invasive species                             |
| Three-cornered Garlic  | <i>Allium triquetrum</i>        | 1            | 24/04/2017          | 0.9 km south   | Medium Impact invasive species                             |
| Traveller's-joy  | <i>Clematis vitalba</i>         | 5            | 10/07/2020          | 0.3 km east    | Medium impact invasive species                             |
| Wild Parsnip   | <i>Pastinaca sativa</i>         | 1            | 03/08/2020          | 0.3 km east    | Medium impact invasive species                             |
| Floral species of high conservation value / concern from tetrad O13E |                                 |              |                     |                |  |
| Species name   | Species name                    | Record count | Date of last record | Nearest record | Conservation status  |
| Giant Hogweed  | <i>Heracleum mantegazzianum</i> | 3            | 31/12/2017          | 1.54 km south  | High Impact invasive species Regulation S.I. 477 (Ireland) |

### 2.1.3 Designated Sites

Sites designated for the conservation of nature include Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) which are designated for the protection of species, habitats and geological interests that are of national importance. Sites designated for protection by the EU are Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These form the *Natura 2000* network of sites and are sometimes referred to as 'European' sites. It is these sites that are of relevance to the screening process for Appropriate Assessment.

All designated sites within 15km of the proposed works were considered during the desktop study stage of the screening assessment in order to assess the potential for significant effects upon their Qualifying Interests / Special Conservation Interests and Conservation Objectives. This stage of the process is used to determine whether any of the designated sites may be 'screened out'. That is, that they can be regarded as not being relevant to the process, having no potential to be significantly affected or impacted upon. This may be due to: a) the distance of the designated sites from the site of proposed works, b) the lack of connectivity such as watercourse or habitat area between the designated sites and the site of the proposed works or c) the nature of the qualifying interests of the designated sites.

### 2.1.4 European designated sites within 15km of the planned works

All European designated sites (SACs and SPAs), as described below, within 15km of the proposed development were considered during the screening process for the potential of having significant effects upon their qualifying interests or special qualifying interests or conservation objectives as a result of the construction and/or operating phases of this development. Site synopses and conservation objectives of the sites (as available) were also examined during this stage of the survey. These sites are listed in Table 7 below. This table also gives distance from the proposed site of works and the outcome of the screening. These sites are presented in Tables 8 and 9.

Table 7. Designated Sites (SPAs & SACs) within 15km of the Proposed Works

| SACs & SPAs within 15 km of site       |   |
|--|---|
| Rye Water Valley / Carton SAC (001398) | South Dublin Bay SAC (000210)                       |
| Rogerstown Estuary SAC (000208)        | Rogerstown Estuary SPA (004015)                     |
| Malahide Estuary SAC (000205)          | Malahide Estuary SPA (004025)                       |
| Baldoyle Bay SAC (000199)              | Baldoyle Bay SPA (004016)                           |
| North Dublin Bay SAC (000206)          | North Bull Island SPA (004006)                      |
| Howth Head SAC (000202)                | South Dublin Bay & River Tolka Estuary SPA (004024) |

Figure 1. SPAs within 15 km of site

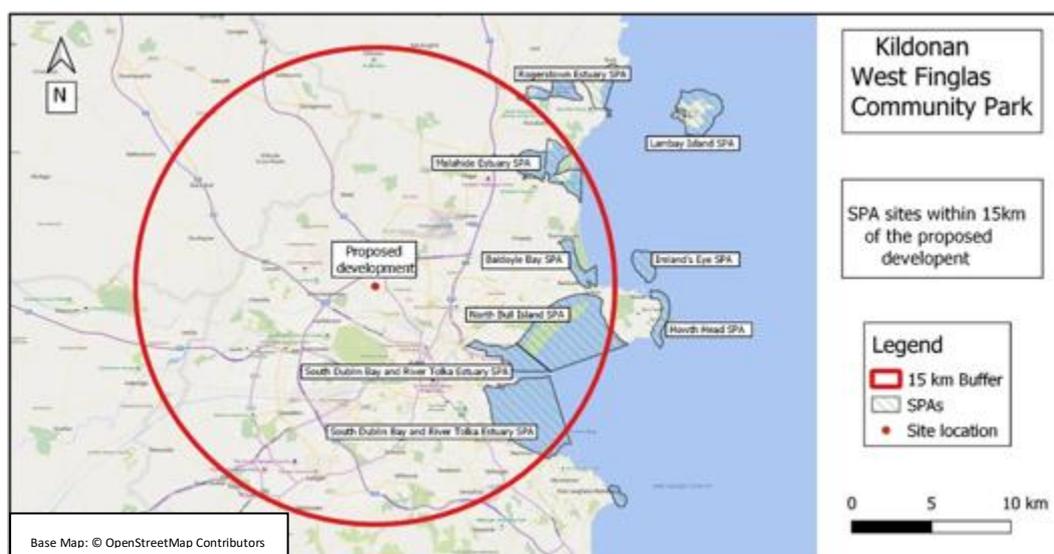


Table 8. Designated Sites (SPAs) within 15km of the Proposed Works, Screening criteria

| Site Code | Site Name   | Distance to (km) | Screening Criteria  |
|-----------|---|------------------|---|
|           | <b>Special Protection Areas (SPAs)</b>                |                  |   |
| 004015    | Rogerstown Estuary SPA (004015)                       | 14.69 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 004025    | Malahide Estuary SPA (004025)                         | 10.77 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 004016    | Baldoyle Bay SPA (004016)                             | 11.82 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 004006    | North Bull Island SPA (004006)                        | 9.29 km          | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 004024    | South Dublin Bay and River Tolka Estuary SPA (004024) | 6.56 km          | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |

Figure 2. SACs within 15 km of site

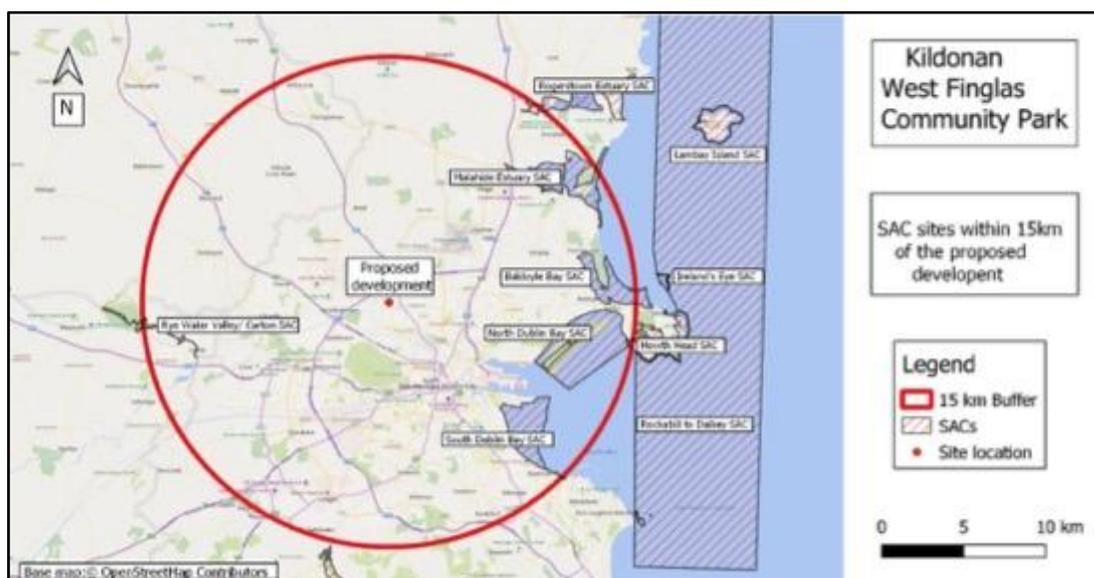


Table 9. Designated Sites (Sacs) within 15km of the Proposed Works, Screening criteria

| Site Code                                   | Site Name                     | Distance to (km) | Screening Criteria  |
|---|-------------------------------|------------------|---|
| <b>Special Areas of Conservation (SACs)</b> |                               |                  |   |
| 001398                                      | Rye Water Valley / Carton SAC | 11.81 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 000208                                      | Rogerstown Estuary SAC        | 14.13 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 000205                                      | Malahide Estuary SAC          | 11.28 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 000199                                      | Baldoyle Bay SAC              | 11.38 km         | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 000206                                      | North Dublin Bay SAC          | 9.3 km           | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 000202                                      | Howth Head SAC                | 14.4 km          | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| 000210                                      | South Dublin Bay SAC          | 9.13 km          | No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |

No potential pathways for impacts on the Natura 2000 sites listed above were identified. Proposed works do not have potential for any likely impacts upon these designated sites. This is due to:

- ⑩ Distance of site of works from closest designated sites
- ⑩ Lack of any hydrological conductivity between the sites.
- ⑩ Limited nature and small scale of works.

These sites are therefore not considered further in this document. While a number of proposed Natural Heritage Areas (pNHAs) occur within 15km of the site proposed for works, these are not considered within the screening process methodology.

## 2.2 Field Surveys

### 2.2.1 Ecological survey and habitat map

An ecological field survey of the proposed development site was carried out on the 16<sup>th</sup> August 2021. Habitat survey and mapping followed the Heritage Council's *Best Practice Guidance* (Smith *et al.* 2011). Habitats were classified according to the Heritage Council scheme (Fossitt, 2000). A map indicating the habitats on the site is presented in Figure 3.

Figure 3. Kildonan Park habitat map



### 2.2.2 Overview

The study area comprises playing fields enclosed by low walls and railings and is surrounded on all sides by residential housing and small green areas. The proposed development site of c. 6.5 ha is currently divided into two sections with c. 1.5 ha to the west and c. 5.0 ha to the east. The eastern section has a path encircling its perimeter and a path linking both sides leading off to a pavilion. It is landscaped with groups and lines of trees and a flower border adjacent to the north-eastern gate.

The western section has a football clubhouse for Finglas United YFC and a five-a-side astro-turf pitch with an area of waste ground in the southwestern corner. The playing fields are tightly mown and the site has little of ecological interest except along the perimeter walls with long grass and broadleaved herbs well developed. There are no watercourses within or in the immediate vicinity of the site to act as a hydrological pathway to any Natura 2000 site. The nearest watercourses are the Scribblestown stream and the Tolka river, both to the south of the site and with a distance of 0.9 km and 1.5 km respectively.

### 2.2.3 Detailed description of habitats within the site

#### **Amenity Grassland (improved) (GA2)**

The football pitches are closely mown with grasses dominated by perennial ryegrass (*Lolium perenne*) and little species diversity otherwise on the pitches. The narrow field margins along the perimeter walls are uncut with medium tall grasses and herbs up to one metre in height. All the margins have the same grasses in common: perennial ryegrass (*Lolium perenne*), meadow-grasses (*Poa* spp.) and bent grasses (*Agrostis* spp.). Also, in common are broadleaf herbs including thistles (*Cirsium arvense*, *C. vulgare*), clovers (*Trifolium* spp.), black nightshade (*Solanum nigrum*), plantains (*Plantago lanceolata*, *P. major*), dandelion (*Taraxacum* spp.), creeping buttercup (*Ranunculus repens*), common Ragwort (*Senecio jacobaea*), nettle (*Urtica dioica*) and docks (*Rumex* spp.).

The northern boundary has occasional growth of Tutsan (*Hypericum androsaemum*) around the eastern gate. At the southern boundary, potato (*Solanum tuberosum*) was recorded along with bittersweet (*Solanum dulcamara*) and the invasive butterfly-bush (*Buddleja davidii*), the latter two are medium impact invasive species. Butterfly bush was recorded along the dividing wall between the east and west sections and around the railings of the pavilion.

#### **Buildings and artificial surfaces (BL3)**

Two buildings are located on the development site, one on each section. The pavilion is surrounded by railings within which two medium impact invasive plant species have been recorded: butterfly-bush (*Buddleja davidii*) and wall cotoneaster (*Cotoneaster horizontalis*). The pavilion is accessed by foot from the pedestrian entrances. A bituminous path, 2.3 m wide, runs parallel with the perimeter wall with a 5.4 m grass margin between the wall and the path except where the path runs along the dividing wall and the gap here is 0.4m.

The clubhouse serves the resident soccer club and has a gated driveway off Kildonan road and a small hard stand car park in front of the clubhouse to the south. A five-a-side Astro turf pitch is located to the west of the site where elder (*Sambucus nigra*) saplings are frequent around the pitch fence.

#### **Woodland and trees**

Three sections of woodland are located at the eastern end of the site and are numbered 1 to 3, see Figure 3 (Habitat map).

Woodland (WD1) 1: Nine mature ash (*Fraxinus excelsior*).

Woodland (WD1) 2: Eight mature ash (*Fraxinus excelsior*).

Woodland (WD1) 3: Nineteen mature trees with a mixture of sycamore (*Acer pseudoplatanus*) and Norway maple (*Acer platanoides*)

### **Treelines and standalone trees.**

Northern boundary: There are three lines and three groups of trees located along the northern boundary comprised of sycamore (*Acer pseudoplatanus*), Norway maple (*Acer platanoides*), Beech (*Fagus sylvatica*) and lime (*Tilia sp.*).

Eastern boundary: There are two lines and several scattered trees located along the northern boundary comprised of silver birch (*Betula pendula*), pedunculate oak (*Quercus robur*), sycamore (*Acer pseudoplatanus*), Norway maple (*Acer platanoides*), lime (*Tilia sp.*), Italian alder (*Alnus cordata*) and willow (*Salix sp.*).

Southern boundary: There are two lines and three groups of trees located along the southern boundary comprised of pedunculate oak (*Quercus robur*), sycamore (*Acer pseudoplatanus*), Norway maple (*Acer platanoides*), lime (*Tilia sp.*), Italian alder (*Alnus cordata*), silver birch (*Betula pendula*), whitebeam (*Sorbus aria*) and hornbeam (*Carpinus betulus*).

### **Waste ground**

An area of waste ground (38 m by 10 m) occupies the southwestern corner of the site. It has recently been cleared of thistles (*Cirsium arvense*, *C. vulgare*), nettle (*Urtica dioica*) and hogweed (*Heracleum sphondylium*). It is species poor with evidence of historic dumping of household waste. Two mature butterfly bushes (*Buddleja davidii*) stand in the most western section of the area.

### **Surrounding / Adjacent Lands**

Kildonan park is surrounded by residential housing on all sides and by three small greens, Amenity Grassland (GA2). The greens are species poor with no trees and range from 0.12 ha. to 0.23 ha.

### **Significance of Habitats**

None of the habitats occurring within the site, or immediately adjacent, are classified as of high conservation concern / sensitivity. There are no Annex I habitats occurring within or beside the area proposed for works. No rare, threatened, or protected species of plants as per the Red Data List (Wyse Jackson *et al.*, 2016) were found. No species listed in the Flora Protection Order (2015) were found to be growing within the site. No such species were recorded within the area of works.

## **2.2.4 Fauna**

### **Mammal Activity**

Rabbit burrows were observed in the waste ground area in the south-west corner of the site, dropping and fresh digging were not observed. There were no signs of any other mammal.

### **Bats**

A visual inspection of the trees was made during daylight hours on the 16th August 2021. The trees were assessed for potential roosting features (PRFs). There are no suitable trees for bat roosting due to the absence of veteran/damaged trees and no growth of ivy (*Hedera hibernica*). A dedicated bat survey employing bat detectors after dusk was not carried out as part of this survey. No habitats or features of potential use to bats will be lost or removed as part of this development. While there is flood-lighting proposed for the all-weather pitch, this will be timed to cease at 10pm in order to minimise potential impacts on bat species.

### **Breeding Birds**

A dedicated bird survey was not carried out as part of the ecological surveys. There is no suitable habitat for breeding birds as the site has open vegetation. However, birds observed foraging on the site on the day of the survey include three hooded crows (*Corvus cornix*) and eight herring gulls (*Larus argentatus*), the latter a species of Conservation Concern and on the Irish Red List (Nelson *et al*, 2019)

Nesting season is March 1<sup>st</sup> to August 31<sup>st</sup> and during this period it is illegal under the Wildlife Acts to disturb or destroy a nest belonging to any bird species.

### **Wintering Wildfowl**

No suitable habitat for these species is found within the site under survey.

### **Freshwater Species, Reptiles and Amphibians**

There are no watercourses within the site proposed for works. The nearest watercourses are the Scribblestown stream and the Tolka river, with a distance south from the site of 0.9 km and 1.5 km respectively. These will not be affected by the proposed development due to sufficient distance between the site of the proposed development and these watercourses. There are no suitable breeding sites for common frog (*Rana temporaria*), smooth newt (*Lissotriton vulgaris*) and common lizard (*Lacerta vivipara*) within the site.

### **Significance of Fauna**

No species listed on Annex II of the Habitats Directive were found to be occurring on the site. No evidence of any protected mammal species was found during the survey. While all bird species are protected to some extent under Irish legislation, the habitat types found here are typical of much of the surrounding areas and do not offer nesting habitat for any (Birds Directive) Annex species.

### **Invasive Species**

Two invasive plant species are found on the study site: butterfly-bush (*Buddleja davidii*) and wall cotoneaster (*Cotoneaster horizontalis*). It was not possible to detect the occurrence of Three-cornered Garlic (*Allium triquetrum*) during surveys carried out in August as the species has become dormant late Summer.

No invasive species were found immediately adjacent to the site during the survey.

### 3. ARTICLE 6(3) SCREENING ASSESSMENT

This section of the report focuses solely on the potential for the proposed works to impact upon Natura 2000 sites. Section 2.1.4 of this report excluded any direct impacts or pathways for impacts on any Natura 2000 sites. This was based upon the proximity of the designated sites to the proposed works. The potential for impacts on the Natura 2000 sites is considered below.

#### 3.1 Article 6(3) Assessment Criteria

##### 3.1.1 Description of the individual elements of the project likely to give rise to impacts on Natura 2000 sites.

None of the individual elements of the proposed development as planned are likely to give rise to significant impacts on the Natura 2000 sites, given the localised scale of the works within existing park grounds.

##### 3.1.2 Description of any likely direct, indirect, or secondary impacts of the project on Natura 2000 sites.

Any likely direct, indirect or secondary impacts of the proposed development, both alone and in combination with other plans or projects, on any Natura 2000 sites SAC by virtue of the following criteria: size and scale, land take, distance from the Natura 2000 site or key feature thereof, resource requirements, emissions, excavation requirements, transportation requirements and duration of construction, operational and decommissioning phases of the works are detailed in the Table 4 below.

Table 10. Assessment of potential likely impacts of the project on the identified Natura 2000

| Assessment of potential likely impacts                     |   |
|--|---|
| Size and scale of proposed development                     | The proposed works site of approximately 6.5 ha is contained within the site boundaries of Kildonan Park and requires no demolition or construction of buildings. There will be no impact on any Natura 2000 sites owing to size or scale of the proposed works.  |
| Land-take  | As there are no works proposed within any Natura 2000 Site, there will be no land-take for the purposes of the project within any designated sites.   |
| Distance from Natura 2000 site or key features of the site | Site is 6.56 km from the nearest Natura 2000 site – South Dublin Bay & River Tolka Estuary SPA (Site Code 004024). No potential pathways for impacts. No hydrological connections exist between Natura 2000 sites and the proposed work location. Distance between site and proposed work location contribute to the lack of likely impact. |
| Resource requirements                                      | No materials for construction or water abstraction will be sourced from within any Natura 2000 site.  |
| Emissions  | There will be no additional emissions of water from the site. Drainage and wastewater will be to existing mains. No emissions are predicted to have any impact upon any Natura 2000 site.   |

|  |   |
|--|---|
| Excavation requirements  | No excavations will take place within any Natura 2000 site. Construction works will be entirely within the areas identified in this screening report.                                 |
| Transportation requirements  | Site has existing access via existing park access points and local roads.   |
| Duration of construction, operation, decommissioning               | Duration of works not known at time of writing. The increased use of the Park for leisure and sport activities will not have any impact on Natura 2000 sites.                         |
| Timing of works  | Potential impacts on any Natura 2000 site or wildlife species is not a consideration for this proposed development.   |
| Cumulative or in-combination Impacts with other Projects and Plans | The proposed development will be constructed entirely within the grounds of Kildonan Park. The development will not create any cumulative effects that will impact Natura 2000 sites. |

### 3.1.3 Description of any likely changes to Natura 2000 sites

Any likely changes to the Natura 2000 site are described in Table 5 below with reference to the following criteria: reduction of habitat area, disturbance to key species, habitat or species fragmentation, reduction in species density, changes in key indicators of conservation value and climate change.

Table 11. Likely Changes to Natura 2000 Sites

| Assessment of Likely Changes                    |  |
|---|--|
| Reduction of habitat area                       | No works will take place within the boundary of any Natura 2000 site. There will be no loss of habitat within any Natura 2000 site as a result of the proposed works.  |
| Disturbance of key species                      | All works associated with the proposed development will take place outside the boundaries of the Natura 2000 sites. None of the qualifying interests of the Natura 2000 sites were recorded during survey. No significant impacts on any key species have therefore been considered likely.  |
| Habitat or species fragmentation                | There will be no works within any SAC or SPA. No impacts on any qualifying species are predicted. Therefore, there will be no impact within the Natura 2000 sites with regard to habitat or species fragmentation.   |
| Reduction in species density                    | No reduction in species density will occur within any SAC or SPA as a result of the proposed works.  |
| Changes in key indicators of conservation value | Habitat integrity is the most relevant of the key indicators of conservation value with regard to the nearest Natura 2000 site. However, the risk of any significant impacts on water quality within these sites during the construction phase can be excluded due to nature of the works and absence of any hydrological connectivity. There will be no impacts on any habitat areas outside the site.<br>As stated above, there will be no loss or reduction in habitat areas or quality within any designated site. |

|                |  |
|----------------|--|
| Climate change | No damage to any Natura 2000 site as a result of or in combination with enhanced climate change is predicted as a result of the proposed development. Rainfall intensities were increased by a factor of 10% to take account of climate change, as required by the GDSDS for attenuation storage design. |
|----------------|--|

### 3.1.4 Likelihood of Interference with the key relationships that define the structure and function of Natura 2000 site as a whole

It is considered that there will be no significant impacts from the proposed works. The proposed works will therefore not interfere with key relationships that define the structure and function of any Natura 2000 site.

### 3.1.5 Indicators of Significance as a Result of the Identification of Effects

Indicators of significance as a result of the identification of effects as set out above in terms of loss, fragmentation, disruption, disturbance, and changes to the key elements of site are detailed in Table 11 below.

Table 12. Indicators of significance

| Indicators of Significance |   |
|----------------------------|---|
| Loss                       | There will be no loss of habitat within any Natura 2000 Site as a result of the proposed works.<br>It is not anticipated that the loss of any species of conservation interest will occur as a result of the proposed works due to injury or mortality. |
| Fragmentation              | No habitat fragmentation to any SAC or SPA is predicted. No habitats of high ecological significance within or outside the nearest Natura 2000 sites will be impacted upon as part of the proposed works.   |
| Disruption                 | No impacts on any Natura 2000 Site are identified as a result of the disruption of any processes.   |
| Disturbance                | There will be no disturbance to species of conservation interest or their habitat within any Natura 2000 Site as a result of the proposed works.  |

|   |  |
|---|--|
| <p>Change to key elements of site (e.g. water quality etc.)</p> | <p>There will be no impacts on water quality. Best practice construction methods will be put in place prior to and for the duration of works. These will ensure adherence to good site practices.</p> <p>Water attenuation and sediment interception storage will be utilised to prevent pollutants and sediments from entering into surface water drains. The use of SuDs features is a requirement of the GDSDS (Greater Dublin Strategic drainage Study). However, all surface water will be drained into the soft landscaped areas adjacent. Therefore, there will be no connection into the drainage system. No impacts to surface water quality are therefore predicted.</p> |
|---|--|

### **3.1.6 Description of any Likely Significant Impacts or Indeterminate Impacts of the Project on the Natura 2000 Site**

Based on a consideration of the likely impacts arising from the proposed works and a review of their significance in terms of the conservation interests and objectives of the Natura 2000 Sites screened, no significant impacts have been identified on the Natura 2000 sites as a result of the proposed development.

## 4. FINDINGS OF ARTICLE 6(3) SCREENING ASSESSMENT

**(a) Name of project or plan:** Kildonan – West Finglas Community Park , Dublin 11.

**(b) Name and location of Natura 2000 Site:** Works are proposed at Kildonan Park, Dublin 11. The nearest Natura 2000 site is South Dublin Bay & River Tolka Estuary SPA (Site Code 004024), located 6.56 km east of the park.

**(c) Description of project or plan:** The proposed development comprises of

- Larney Park (the western section of Kildonan Park with Finglas YFC Club House) retained as grass pitch and integrated into the park and is no longer separated, boundary wall is removed.
- All-weather 11-a-side pitch with fence and lighting.
- Potential change existing 5 a side pitch into multi use games area. this would be open to the public within park. table tennis zone added.
- Zones for active recreation bowling and / or tennis.
- Grass areas for passive recreation and football.
- Potential full or half basketball court.
- Potential coffee kiosk added to building or in area.
- Marked running zone for clubs and non-competitive users.
- Potential locations for outdoor nature walks and outdoor class exist within the masterplan area.

**(d) Is the project or plan directly connected with or necessary to the management of the site?**

The project is not directly connected with or necessary for the management of any Natura 2000 site.

**(e) Are there other projects or plans that together with the project or plan being assessed could affect the site (provide details)?**

On the basis that the proposed project will have no impacts on any Natura 2000 site and the development is being undertaken within the footprint of an existing recreational park, and there being no other significant projects predicted as having potential impacts, no cumulative or in-combination impacts are predicted.

### 4.1 Assessment of Significance of Effects

**(a) Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site**

The proposed project will not significantly affect any Natura 2000 Sites.

**(b) Explain why these effects are not considered significant**

There will be no direct impacts upon the Natura 2000 Sites as:

- ⑩ No works will take place within any Natura 2000 Site.
- ⑩ No resources of any Natura 2000 site will be affected by works.

There will be no indirect impacts upon any Natura 2000 Sites as:

- ⑩ The project is located within the grounds of an existing park.
- ⑩ There is no hydrological connectivity between the site and designated sites.

#### 4.1.1 Data collected to carry out the assessment

The following sources of data were employed:

- ⑩ NPWS protected species database and online mapping.
- ⑩ National Biodiversity Data Centre Database

#### Level of assessment completed

- ⑩ Desk Study
- ⑩ Site visit and survey in August 2021
- ⑩ JNCC Phase 1 Habitat Assessment
- ⑩ Fossitt Level III Habitat Recording

## 4.2 Overall Conclusion

In conclusion, no impacts are likely as a result of the proposed development on the conservation objectives or overall integrity of any Natura 2000 Site. **Therefore, Stage 2 Appropriate Assessment is not required.**

## 5.0 References

Colhoun K and Cummins S (2013) *Birds of Conservation Concern in Ireland 2014 – 2019*. *Irish Birds* 9: 523 – 544

European Commission (2002). *Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*.

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

JNCC (2010) *Handbook for Phase 1 habitat survey - a technique for environmental audit*. Joint Nature Conservation Committee, Peterborough, UK.

Nelson, B., Cummins, S., Fay, L., Jeffrey, R., Kelly, S., Kingston, N., Lockhart, N., Marnell, F., Tierney, D. and Wyse Jackson, M. (2019) Checklists of protected and threatened species in Ireland. *Irish Wildlife Manuals*, No. 116. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland.

National Roads Authority (2009) *Environmental Impact Assessment for National Road Schemes – A Practical Guide*. NRA, Dublin.

Parnell, J. & Curtis, T. (2012) *Webb's An Irish Flora*. Cork University Press, Cork.

Scannell, M J P and Synott, D M, 1987, *Census Catalogue of the Flora of Ireland*. Stationary Office, Dublin

Wyse Jackson, M., Fitzpatrick, Ú., Cole, E., Jebb, M., McFerran, D., Sheehy Skeffington, M. & Wright, M. (2016) *Ireland Red List No. 10: Vascular Plants*. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Dublin, Ireland.



## 6 Plates



*Plate 7. View from side of club house, looking east.*



*Plate 8. View from southwest gate, looking north.*



*Plate 9. View from southeast corner looking north.*



*Plate 10. View of waste ground (foreground) and pavilion in background, view to north.*



*Plate 11. View from northeast corner, looking south.*



*Plate 12. View from northwest gate, looking east.*