

**Appropriate Assessment Screening Report**  
**Proposed All-Weather Pitch at Martin Savage Park**



**For: Dublin City Council**

**Date: October 2023**

### **Note**

Works, plans, methodologies, materials, and infrastructural requirements are based on the client's brief, draft plans, and drawings provided to Flynn Furney Environmental Consultants as of October 2023.

### **Statement of Authority**

This Natura Impact Statement has been carried out by suitably qualified and experienced professionals of Flynn Furney Environmental Consultants. These were Aidan Murphy BSc, MSc QCIEEM, and Billy Flynn BSc, MSc, MCIEEM, CEnv.



# Contents

<b>1. INTRODUCTION</b> .....	4
<b>1.1 Proposed works at Martin Savage Park, Dublin 7</b> .....	3
<b>1.2 Relevant legislation and overall screening methodology</b> .....	4
<b>1.3 The site: Lands at Martin Savage Park</b> .....	6
<b>1.4 Description of the planned development</b> .....	6
<b>2. ECOLOGICAL ASSESSMENT WORKS</b> .....	8
<b>2.1 Desktop Study</b> .....	8
<b>2.1.1 Fauna</b> .....	8
<b>2.1.2 Light-bellied Brent Geese and other SCI bird species</b> .....	8
<b>2.1.3 Flora</b> .....	10
<b>2.1.4 Designated Sites</b> .....	10
<b>2.1.5 European designated sites within 15km of the planned works</b> .....	11
<b>2.2 Field Surveys</b> .....	11
<b>2.2.1 Ecological survey and habitat map</b> .....	11
<b>2.2.2 Overview</b> .....	12
<b>2.2.3 Detailed description of habitat areas</b> .....	12
<b>2.2.4 Surrounding habitats</b> .....	12
<b>2.2.5 Invasive Species</b> .....	13
<b>2.2.6 Significance of habitats</b> .....	13
<b>2.2.7 Fauna</b> .....	13
<b>2.2.8 Brent Geese surveys - transects and observations</b> .....	13
<b>2.2.9 Significance of fauna</b> .....	15
<b>3 ARTICLE 6(3) SCREENING ASSESSMENT</b> .....	17
<b>Article 6(3) Assessment Criteria</b> .....	17
<b>3.1 Description of the individual elements of the project likely to give rise to impacts on Natura 2000 sites</b> .....	17
<b>3.2 Description of any likely direct, indirect, or secondary impacts of the project on Natura 2000 sites</b> .....	16
<b>3.3 Description of any likely changes to Natura 2000 sites</b> .....	18
<b>3.4 Likelihood of Interference with the key relationships that define the structure and function of Natura 2000 site as a whole</b> .....	19
<b>3.5 Indicators of Significance as a Result of the Identification of Effects</b> .....	19
<b>3.6 Description of any likely significant impacts or indeterminate impacts of the project on the Natura 2000 Site</b> .....	20
<b>4. FINDINGS OF ARTICLE 6(3) SCREENING ASSESSMENT</b> .....	19

<b>4.1 Assessment of significance of effects .....</b>	<b>20</b>
<b>4.2 Overall conclusion .....</b>	<b>20</b>
<b>5 REFERENCES.....</b>	<b>22</b>
<b>6. PLATES .....</b>	<b>24</b>

### List of Tables

- Table 1. The consultations carried out to date
- Table 2. Faunal species of high conservation value/concern from tetrad O13D
- Table 3. NBDC Brent Geese records within 4 km radius of proposed development
- Table 4. Brent Geese feeding sites of importance within 4 km radius of the development site
- Table 5. Floral species of high conservation value/concern from tetrad O13D
- Table 6. Designated Sites (SPAs & SACs) within 15km of the Proposed Works.
- Table 7. Designated Sites (SPAs) within 15km of the Proposed Works, Screening criteria
- Table 8. Designated Sites (SACs) within 15km of the Proposed Works, Screening criteria
- Table 9. Droppings count results for the six 100m line transects
- Table 10. Assessment of potential likely impacts of the project on the identified Natura 2000 sites
- Table 11. Likely Changes to Natura 2000 Sites
- Table 12. Indicators of significance

### List of Figures

- Figure 1. Locations of Brent Geese feeding sites of importance within 4 km radius of the development site (Scott Cawley, 2017)
- Figure 2. SPAs within 15 km of site
- Figure 3. SACs within 15 km of site
- Figure 4. Martin Savage Park habitat map
- Figure 5. Line Transect locations (100m sections) on blue tramlines
- Figure 6. Flock of Brent Geese feeding on playing field in Martin Savage Park

### List of Plates

- Plate 1. View from south-west corner of site. View to north-east.
- Plate 2. View from south-east corner of site. View to north-west
- Plate 3. View from north-east corner of site. View to south-west
- Plate 4. View from south east corner. View to west

# 1. INTRODUCTION

## 1.1 Proposed works at Martin Savage Park, Dublin 7

Works are proposed at Martin Savage Park, Dublin 7. It is planned by Dublin City Council for the development of a soccer size all-weather pitch along with an additional all-weather multi use games area. These will be bounded by a ball stop fence and flood lighting. A small play area is also proposed.

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 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’ (European Commission, 2019). This report and contributory fieldwork were carried out by guidelines given by the Department of Environment, Heritage and Local Government (2009, amended February 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. All relevant Natura 2000 sites are then reviewed for potential impacts or pathways for impacts from the proposed development. Sections 3 and 4 of the report comprise the AA Screening that specifically focus on the potential for impacts on Natura 2000 sites and their conservation objectives.

Consideration has also been given to the 'source-pathway-receptor approach.' This is a standard tool in environmental assessment.



The source-pathway-receptor concept in ecological impact assessment relates to the idea that for the risk of an impact to occur, a 'source' is needed, e.g. a construction site; then a 'receptor', in this case, sites designated for nature conservation; and finally a 'pathway' between the source and the receptor, this could be a watercourse that links the development site to the designated site. Even though there might be a risk of an impact that does not mean that it might necessarily occur, and if it does occur, it may not be significant. Identification of a risk means that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the risk and the characteristics of the receptor (in this instance, this is any Natura 2000 sites).

### 1.3 The site: Lands at Martin Savage Park.

The study site is located in the Martin Savage Park, Ashtown, Dublin 7. The centre of the site is ITM 711575 737408. Martin Savage Park is bounded to the north by railway lines which run adjacent and parallel with the Royal Canal pNHA; to the south, east and west by housing estates (Kempton, Glendhu and Martin Savage Park estates). Access to the clubhouse for St. Oliver Plunket's GAA club is located along the middle of the southern boundary of the park

### 1.4 Description of the Planned Development

#### Description of the Works

The proposal seeks to develop 1.1 ha of the ca. 8.6 ha of parkland contained within the most easterly section of Martin Savage Park. The proposed development site is bounded by railway lines to the north, the Glendhu Estate to the east & south and by playing fields to the west.

Development site works to include:

- Soccer Size all weather pitch along with an additional all weather multi use games area.
- The pitch to be bounded by a high ball stop fence along with flood lighting.
- The works will require earth moving and drainage works
- As part of the works in the park, additional paths are proposed along with a small play area
- Due to the confined nature of the site it is unlikely that all the top soil will be retained on site
- There is an existing drainage basin at the green space in Glendhu Park to the east of Martin Savage Park. This will be enhanced as part of the works to improve its visual appearance while also providing any drainage requirements from the all-weather surfaces

*Table 1. The consultations carried out to date.*

Stakeholder	Nature of Consultation	Outcome
Dublin City Council	<ul style="list-style-type: none"><li>• Determining scope of survey</li><li>• Site visits &amp; survey</li><li>• Reviews of data and reporting</li></ul>	<ul style="list-style-type: none"><li>• Site visits/Surveys/Assessments completed</li><li>• Desktop research carried out</li><li>• Appropriate Assessment Screening carried out</li><li>• Non-requirement for a Stage 2 Appropriate Assessment (NIS) confirmed</li></ul>



## 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 (NPWS) and National Biodiversity Data Centre (NBDC) databases on protected sites and species. The site is located within tetrad O13D (a tetrad being an area of 2km x 2km).

A search of the NBDC's online portal (accessed 13/02/2022) returned the following species of high conservation value and concern from within the tetrad O13D, see Tables 2 – 5.

#### 2.1.1 Fauna

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

Table 2. Faunal species of high conservation value/concern from tetrads O13D

Common name	Scientific name	Record count	Date of last record	Nearest record	Conservation status
Black-headed Gull	<i>Larus ridibundus</i>	3	15/01/2020	0.5 km N	BoCCI Amber listed species*
Eurasian Curlew	<i>Numenius arquata</i>	1	22/11/2018	170 m E	BoCCI Red listed species*
Herring Gull	<i>Larus argentatus</i>	6	15/01/2020	1.7 km S/E	BoCCI Amber listed species*
Harlequin Ladybird	<i>Harmonia axyridis</i>	2	04/01/2022	200 m S	High Impact invasive species Regulation S.I. 477 (Ireland)
Jenkins' Spire Snail	<i>Potamopyrgus antipodarum</i>	1	18/05/2012	1.4 km S/W	Medium Impact Invasive Species
Red-eared Terrapin	<i>Trachemys scripta</i>	2	10/06/2016	1.8 km S/W	Medium Impact invasive species. Regulation
Daubenton's Bat	<i>Myotis daubentonii</i>	4	04/05/2013	400 m E	EU Habitats Directive Annex IV species. Irish Wildlife Acts
Lesser Noctule	<i>Nyctalus leisleri</i>	9	04/05/2013	400 m E	EU Habitats Directive Annex IV species. Irish Wildlife Acts
Common Pipistrelle	<i>Pipistrellus pipistrellus sensu lato</i>	3	04/05/2013	400 m E	EU Habitats Directive Annex IV species. Irish Wildlife Acts
Soprano Pipistrelle (Pipistrellus pygmaeus)	<i>Pipistrellus pygmaeus</i>	4	04/05/2013	400 m E	EU Habitats Directive Annex IV species. Irish Wildlife Acts
Common Frog	<i>Rana temporaria</i>	4	25/03/2020	0.9 km W	EU Habitats Directive Annex V species. Irish Wildlife Acts
Eastern Grey Squirrel	<i>Sciurus carolinensis</i>	13	25/09/2018	0.7 km W	High Impact invasive species Regulation S.I. 477 (Ireland)

\* Birds of Conservation Concern in Ireland (2020-2026)

#### 2.1.2 Light-bellied Brent Geese and other SCI bird species

One of the qualifying interests (QIs) of the Dublin Bay SPAs has been recorded in tetrad O13D within the last two years, the black-headed gull (*Choicephalus ridibundus*). Black-headed gulls unlike most other seagulls, breed mainly in the midlands, west and north of the country on bogs, marshes, brackish lagoons and islands. It is not dependent on playing fields and park grasslands; it is generalist in its feeding, at home on mudflats, refuse tips and behind fishing boats or tractors. The development will have no effect on this QI of the Dublin SPAs and is not considered further in this assessment.

Dublin bay is the most important site for Light-bellied Brent Geese (Brent Geese) in the Republic of Ireland, providing reliable access to food, fresh water and a safe roosting location. Brent Geese are known to frequent larger parks in Dublin to graze on grass during the latter half of the winter

months. NBDC records for Brent Geese within a 2 km radius of the development site have been recorded within Tolka Valley park and nearby Farnham Crescent, see Table 3 below.

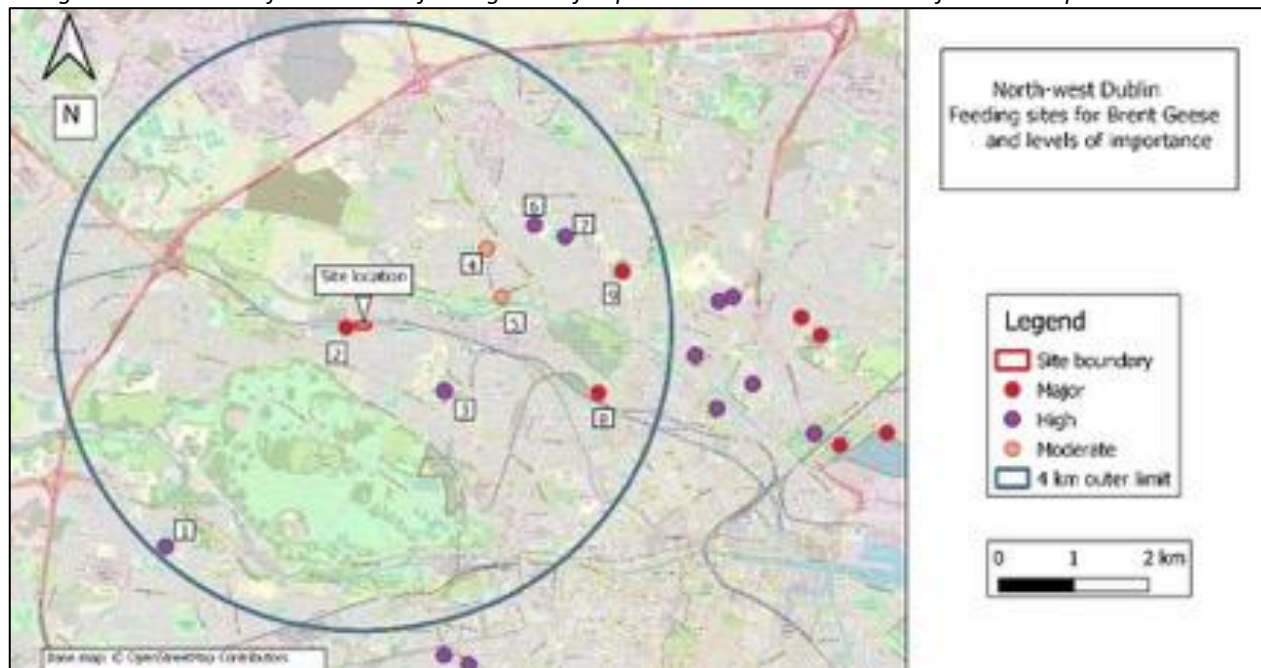
Table 3. NBDC Brent Geese records within 4 km radius of proposed development (accessed 23/02/2022)

Grid reference (ITM)	Record count	Date	Location	Dataset	Distance from site	Tetrad
O13100 37600	12	07/12/2016	Tolka Valley park lower, D11	Birds of Ireland	1.2 km east	O13I
O12800 37500	50	19/12/2016	Tolka Valley park, D11	Birds of Ireland	1.4 km east	O13I
O12900 38500	70	16/01/2017	Farnham Crescent Park, D.11	Birds of Ireland	0.8 km north-east	O13J
O12900 38600	87	27/01/2017	Farnham Crescent Park, D.11	Birds of Ireland	0.8 km north-east	O13J
O11666 34700	200	31/12/2020	Phoenix park, Dublin	Birds of Ireland	2.7 km south	O13C

The Natura Impact Statement (NIS) by Scott Cawley (2017)<sup>1</sup> identified 113 no. terrestrial inland feeding sites used by Brent geese in Dublin City and its environs from 2012/13 to 2016/17. Sites of importance were identified based on all available data and from two consecutive wintering bird surveys (2015-2016 and 2016-2017). Figure 1 shows site locations within a 4 km radius of the proposed development site and their levels of importance (Scott Cawley, 2017).

The NIS by Enviroguide (2019)<sup>2</sup> identified 70 no. inland feeding sites for Brent Geese from surveys carried out by Scott Cawley (2016/17) and Enviroguide Consulting (2018/19 and 2019/20). Peak count numbers for sites within a 4 km radius are presented in Table 4.

Figure 1. Locations of Brent Geese feeding sites of importance within 4 km radius of the development site



<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.

<sup>2</sup> Enviroguide (2019) Natura Impact Statement for proposed strategic housing development at St Paul’s College, Sybil Hill road, Raheny, Dublin 5

Table 4. Brent Geese feeding sites of importance within 4 km radius of the development site and peak counts of Brent Geese (Enviroguide, 2019)

Site number	Survey Site	2018/19	2016/17	2015/16	Site number
1	Palmerstown / Glenaulin Park	0	0	88	1
2	Ashtown. Martin Savage park	112	565	73	2
3	Cabra/Pope John Paul II Park	0	200	100	3
4	Finglas. Erin's Isle GAA	767	0	Not surveyed	4
5	Tolka Valley Park	0	0	8	5
6	Finglas. Gaelscoil Uí Earcain	150	202	Not surveyed	6
7	Finglas. Johnstown Park	0	360	Not surveyed	7
8	Glasnevin. St. Vincent's P. School	0	0	408	8
9	DCU Sports Grounds	0	600	Not surveyed	9

Based on Scott Cawley's (2017) assessments, Martin Savage Park is one of three sites of major importance within a 4 km radius of the study site, with four of high importance and two of moderate importance. Over the course of three seasons Martin Savage Park recorded peak counts of Brent Geese with 73, 565 and 112 for seasons 2015/16, 2016/17 and 2018/19 respectively. The site is part of a network of suitable habitats and is approaching the inner limit for Brent Geese feeding sites. This site is therefore of some importance for an SCI species of a number of Special Protection Areas as an ex-situ inland feeding habitat. This is therefore discussed later in this document.

### 2.1.3 Flora

None of the species listed in Table 5 below occur within the footprint of the proposed development.

Table 5. Floral species of high conservation value/concern from tetrads O13D

Common name	Scientific name	Record count	Date of last record	Nearest record	Conservation status
Water Fern	<i>Azolla filiculoides</i>	2	31/12/1983	1.8 km S/W	Medium impact invasive species
Canadian Waterweed	<i>Elodea canadensis</i>	2	18/05/2012	1.8 km S/W	High Impact invasive species Regulation S.I. 477 (Ireland)
Cherry Laurel	<i>Prunus laurocerasus</i>	2	19/05/2012	1 km S/W	High Impact invasive species Regulation S.I. 477 (Ireland)
Evergreen Oak	<i>Quercus ilex</i>	2	01/06/2020	1.25 km S/W	Medium impact invasive species
Giant Hogweed	<i>Heracleum mantegazzianum</i>	13	15/07/2013	0.8 km N/W	High Impact invasive species Regulation S.I. 477 (Ireland)
Hairy St John's-wort	<i>Hypericum hirsutum</i>	1	23/07/2020	1.75 km S	Threatened Species: Endangered
Indian Balsam	<i>Impatiens glandulifera</i>	15	02/09/2013	0.65 km N/E	High Impact invasive species Regulation S.I. 477 (Ireland)
Sycamore	<i>Acer pseudoplatanus</i>	3	01/06/2020	1.3 km S	Medium impact invasive species
Turkey Oak	<i>Quercus cerris</i>	1	09/05/2019	1.7 km S	Medium impact invasive species

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.

### 2.1.4 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 European designated sites within 15km of the proposed works and any other potentially relevant sites 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.

### 2.1.5 European designated sites relevant to the planned works

All European designated sites (SACs and SPAs), as described below, within 15km of the proposed Development or otherwise 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 6 below. The sites are also presented in Tables 7 and 8 and the tables also gives distance from the proposed site of works and the outcome of the screening.

*Table 6. Designated Sites (SPAs & SACs) within 15km of the Proposed Works*

SACs & SPAs within 15 km of site	
Rye Water Valley / Carton SAC (001398)	Glenasmole Valley SAC (001209)
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)
South Dublin Bay SAC (000210)	South Dublin Bay & River Tolka Estuary SPA (004024)

The most recently designated Special Area of Conservation – Rockabill to Dalkey Island SAC (Site Code 003000) was considered as part of this assessment. However, given its significant remove and lack of any hydrological or other connection, it may be screened out of this assessment at this stage.

Figure 2. SPAs within 15 km of site

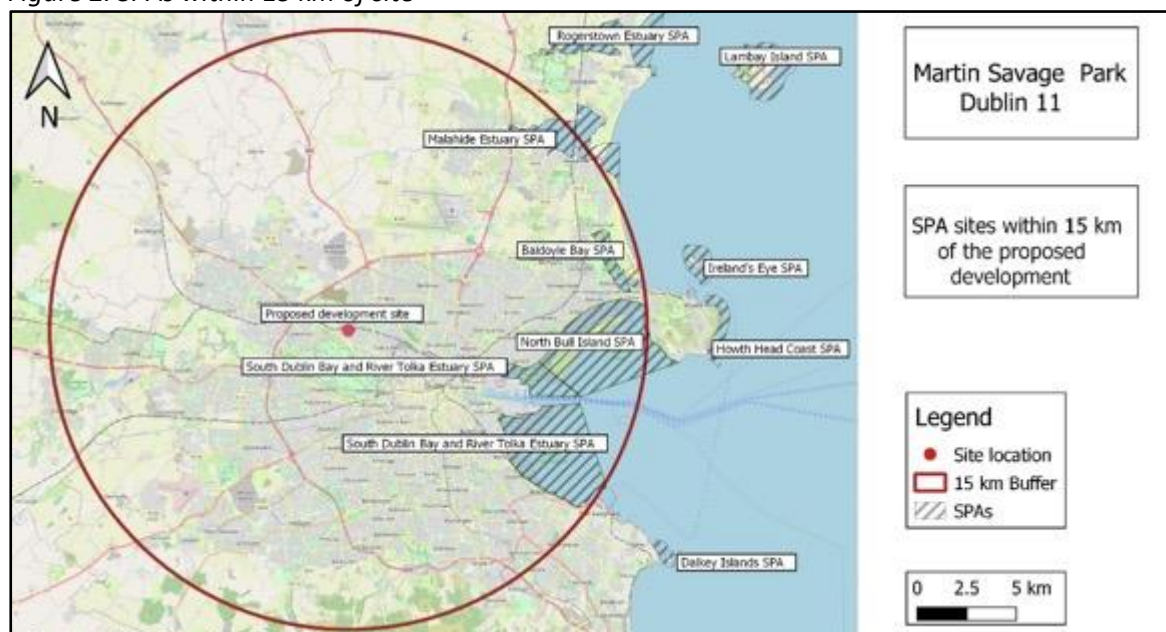


Table 7. Designated Sites (SPAs) within 15km of the Proposed Works.

Site Code	Site Name	Distance to (km)	Screening Criteria
<b>Special Protection Areas (SPAs)</b>			
004025	Malahide Estuary SPA	13 km	No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site & proposed work location contribute to the lack of likely impact.  Suitability of habitat here for feeding habitat for an ex-situ SCI of a number of SPAs has been confirmed. Further assessment is therefore required.
004016	Baldoye Bay SPA	13.1 km	No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site & proposed work location contribute to the lack of likely impact.  Suitability of habitat here for feeding habitat for an ex-situ SCI of a number of SPAs has been confirmed. Further assessment is therefore required.
004006	North Bull Island SPA	9.6 km	No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site & proposed work location contribute to the lack of likely impact.  Suitability of habitat here for feeding habitat for an ex-situ SCI of a number of SPAs has been confirmed. Further assessment is therefore required.
004024	South Dublin Bay and River Tolka Estuary SPA	6.5 km	No potential pathways for impacts. No hydrological connections exist between the Natura 2000 site and the proposed work location. Distance between site & proposed work location contribute to the lack of likely impact.

		Suitability of habitat here for feeding habitat for an ex-situ SCI of a number of SPAs has been confirmed. Further assessment is therefore required.
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Figure 3. SACs within 15 km of site



**Table 8. SACs within 15 km of site**

Site Code	Site Name	Distance to (km)	Screening Criteria
	<b>Special Areas of Conservation (SACs)</b>		
OO1398	Rye Water Valley / Carton SAC	11.2 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	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. Potential impacts on ex-situ SCI identified.
000199	Baldoyle Bay SAC	12.6 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. Potential impacts on ex-situ SCI identified.
000206	North Dublin Bay SAC	9.6 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. Potential impacts on ex-situ SCI identified.
000210	South Dublin Bay SAC	8.6 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. Potential impacts on ex-situ SCI identified.
001209	Glenasmole Valley SAC	13.3 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.

No potential pathways for impacts on the Natura 2000 sites listed above were identified. However, the potential for impacts on Light-bellied Brent Geese arising from a reduction in ex-situ feeding habitat has been identified. This is dealt with in the following section.

### 2.1.6 SCI Species Light-bellied Brent Geese

The above species has been identified as a potential *ex-situ* SCI species that may be impacted upon. The Light-bellied Brent Geese was considered at the outset of this screening assessment. Benson (2009) identified and ranked c. 144 sites of significance for inland feeding of this species. Ashtown Playing Pitches (of which Martin Savage Park is a part) was identified as No. 30 in this assessment, making this 30<sup>th</sup> in this ranking in terms of importance of this site as a feeding area. As it was considered likely that Brent Geese might utilise this site, a dedicated survey for Brent Geese droppings was carried out.

#### Survey of Brent Geese Usage

On 14<sup>th</sup> January 2022 Martin Savage Park was surveyed for Brent Geese droppings, taking the opportunity that no geese were present. The grassland was walked in six 100m long transects in two parallel lines (20 m apart), following the middle length of the park which measures 600m. Brent Geese dropping were counted out to 1m on both sides of transect lines. The purpose of the survey was to record the presence or absence of dropping to determine if Brent Geese had visited the Park recently and where they were feeding. A follow up bird count survey was undertaken 15<sup>th</sup> January

2022 to determine numbers visiting and feeding preferences. The graphic below shows the location of the transects walked.



### Results of line transect survey

The results indicate that Brent Geese are feeding in the area covered by Line Transect C and to a lesser extent in adjoining transects (B & D). The droppings were absent from Transects E & F which corresponds with the location of the proposed all-weather pitches. The playground location as proposed is in close proximity to Transect C - the Transect with the greatest Brent Geese activity. The results of the droppings counts are presented in Table 9 below.

Table 9. Droppings count results for the six 100m line transects

100m Line Transect	A	B	C	D	E	F
Record count	8	62	142	16	0	0

### Results of bird count survey

The follow-up site visit to Martin Savage Park site was on 15<sup>th</sup> January 2022 at 10:30 am. Approximately 500 no. Brent Geese were recorded with a small number of gull species feeding alongside (gulls not exceeding 20 no.). The location of the flock overlaps with Line Transects lines B & C with the main concentration in Transect B.

### Habitat suitability for Brent Geese

Brent Geese are known to graze on ex situ habitat such as amenity grassland in and around Dublin. The proposed development sites and surrounding Park contain areas of amenity grassland which has suitability for wetland species and in particular Brent Geese which are a Qualifying Interest for the nearby SPAs to the east; the nearest being South Dublin Bay & River Tolka Estuary, 6.5 km east.

Brent Geese favour open grassland sites with low vegetation cover for potential predators. The transect survey results would indicate that the Geese do not favour the grassland to the east where Transects E & F are located (the site of the proposed all-weather pitches). The site is more narrow and enclosed by trees compared to the more open spaces to the west of the park (Transects A-D).



A long-term study by Enviroguide (2019) showed that Light-bellied Brent Geese are not site loyal to any one inland feeding site during the winter but rather use a wider network of sites. This would imply that Brent Geese feeding at Martin Savage Park are not significantly loyal to this site and are using this on a random basis as part of a wider feeding area scattered across this part of Dublin.

It is noteworthy that the greatest concentration and number of Brent Geese droppings occurred in transects outside the area proposed for development as an all-weather pitch. In fact 0 droppings were found within the proposed footprint of this development. It may be reasonably concluded that the development would have minimal impact on this local temporary population.

The above study by Enviroguide collated information from existing sources as well as contemporary data. This allowed a review of feeding areas available to Brent Geese in the Dublin area. Over 139 sites (derived from Benson, 2009), the total area of available *ex-situ* inland feeding sites in this area was conservatively calculated as c. 3,870,000m<sup>2</sup>.

At m<sup>2</sup> the all-weather pitch would represent c. 9.3% of the total grassed area of Martin Savage Park and c. 0.2% of the total available *ex-situ* feeding sites available to this species in the wider Dublin area. It is therefore considered unlikely that the development of the site for the proposed all-weather pitches will result in the loss of any significant feeding habitat for Brent Geese.

The proposed facility will include flood-lighting of the playing area. As Brent Geese will not be utilising any part of this site outside daylight hours, the impact of lighting on this species may be excluded from consideration here.

The proposed facility will include vertical installations. These will be fencing, ball-stop netting, hurling wall, lighting columns and goalposts. However, as Brent Geese will only be in flight during hours of daylight, all of these will be visible to the geese. Risks of collision would therefore be of no greater significance than any built structures extant in this area.

It may reasonably be concluded that the proposed development would not have any *likely* significant effects on this *ex-situ* SCI species.

This species is therefore excluded from further consideration in this assessment.

### 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 2.1.5 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.

#### Article 6(3) Assessment Criteria

##### 3.1 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.

##### 3.2 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 Table 10 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 sites of approximately 0.91ha is within the existing Martin Savage Park grounds (8.46 ha) and represents a small area. 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 6.5 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. Rainwater to percolate to ground. 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 park entrance from Glendhu Road. No further access is required.
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 Martin Savage Park. No developments are known that may give rise to cumulative or in combination effects that will impact Natura 2000 sites.

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

Any likely changes to the Natura 2000 site are described in Table 11 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. Loss of <i>ex-situ</i> feeding habitat for Light-bellied Brent Geese may not be considered significant.
Disturbance of key species	All works associated with the proposed development will take place outside the boundaries of the Natura 2000 sites. Three of the qualifying interests of the Natura 2000 sites were recorded during survey, herring gull, black-headed gull and Brent geese, however no significant impacts on these species is 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. No significant loss of habitat upon which any SCI species relies is considered likely.
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

	<p>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.</p> <p>As stated above, there will be no loss or reduction in habitat areas or quality within any designated site.</p>
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

### 3.4 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.

### 3.5 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 12 below.

Table 12. Indicators of significance

Indicators of Significance	
Loss	<p>There will be no loss of habitat within any Natura 2000 Site as a result of the proposed works.</p> <p>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.</p>
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.
Change to key elements of site (e.g. water quality etc.)	<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.</p>

### **3.6 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:** All Weather GAA pitch, Martin Savage Park, Dublin 11

**(b) Name and location of Natura 2000 Site:**

The nearest Natura 2000 site is South Dublin Bay & River Tolka Estuary SPA (Site Code 004024), located 6.5 km east of the development site.

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

- The introduction of a Soccer size all-weather pitch along with multi use games area
- The works will require earth moving and drainage. Due to the confined nature of the site it is unlikely that all the top soil will be retained on site
- There is an existing drainage basin at the green space in Glendhu Park to the east of Martin Savage Park. This will be enhanced as part of the works to improve its visual appearance while also providing any drainage requirements from the all-weather surfaces
- As part of the works in the park, additional paths are proposed along with a small play area
- The project would require the felling of a number of existing trees which would be replaced within the park as part of the project.
- The pitch would be bounded by a high ball stop fence along with flood lighting.

**(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 community 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:

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

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

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

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

The following sources of data were employed:

- EPA maps ([www.gis.epa.ie](http://www.gis.epa.ie))
- National Biodiversity Data Centre Database
- NPWS protected species database and online mapping

### **Level of assessment completed**

- Desk Study
- Site visits and surveys in January and February 2022 and August 2023
- JNCC Phase 1 Habitat Assessment
- Fossitt Level III Habitat Recording

## **4.2 Screening Conclusion**

In view of the best and objective scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed development as described here, individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any European sites. Therefore, it is recommended to Dublin City Council that Appropriate Assessment is not required.

## 5.0 References

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## 6. Plates



Plate 1. View from south-west corner of site. View to north-east



Plate 2. View from south-east corner of site. View to north-west



Plate 3. View from north-east corner of site. View to south-west



Plate 4. View from north-west corner of site. View to south-east

**Appendix 1.** Proposed Site Layout (updated October 2023)

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