



Appropriate Assessment Screening Report

PRESENTED TO

The Iveagh Trust
Proposed Development at 43-50 Dolphin's
Barn Street, Dublin 8

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1 INTRODUCTION

1.1 Background

Enviroguide Consulting was commissioned by The Iveagh Trust to prepare an Appropriate Assessment Screening Report for a Proposed Residential Development, entitled Proposed Development at 43-50 Dolphin's Barn Street, Dublin 8 hereafter referred to as 'Proposed Development' or 'Site', when referring to the application Site area. This report contains information to enable the Competent Authority to undertake Stage 1 Appropriate Assessment (AA) screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

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

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

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants. CS authored this report while surveying was conducted by CS, SC, KM, CRK.

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

SC is an experienced Ecologist with a B.Sc. (Hons) in Botany from the University of Galway. SC has extensive experience in surveying bats, birds, mammals, plants, habitats, reptiles, amphibians, and invasive species.. SC's experience in ecological report writing extends from Appropriate Assessment (AA) Screenings and Natura Impact Statements (NIS) to Ecological Impact Assessments (EclA), Bat Reports, Constraints Reports, Invasive Species Management Plans (ISMP), and supporting submissions in Environmental Impact Assessment Report (EIAR) chapters.

KM is an intern Ecologist with a wealth of experience in desktop research, report writing, and QGIS mapping, as well as practical field and laboratory experience including bat surveys, freshwater macroinvertebrate surveys, and water quality analysis. KM has prepared several Municipal District Summaries and Stage I Appropriate Assessment Reports.

CRK is an intern Ecologist with a M.Sc. in Biodiversity and Conservation from Trinity College Dublin. CRK's experience as an ecologist is with a broad variety of ecological reports and literature, and field surveys conducted. CRK has experience in surveying habitats, birds, plants, bats, mammals and invasive species, with some experience in assessing welfare conditions of animals using behavioural repertoires as indicators. CRK's experience in ecological report writing extends from Research associated literature reviews to AA screening reports and Municipal District Summary reports

1.3 Description of Proposed Development

1.3.1 Site Location

The Site of the Proposed Development is located on the west side of Dolphin's Barn Road in the Dolphin's Barn area, Dublin 8. The Site covers an area of 0.358 ha encompassing former factory buildings to the rear with a strip of buildings fronting onto Dolphin's Barn Street (No's 43-50). The Site is bound by Dolphin's Barn Street to the east, No. 51 Dolphin's Barn Street to the northeast, No. 7 Poole Terrace to the south and boundaries of rear gardens of the residential properties located on Reuben Street and Emerald Square to the west and north of the application site respectively. The Site is situated across from The Coombe Women and Infants Hospital located directly to the east, and approx. 330m to the north of the Grand Canal. The Fatima Luas Red-line stop is located approx. 370m to the north of the Site. (See Figure 1 for Site location).

1.3.2 Proposed Development Description

The proposed development consists of the following:

- The demolition of all existing buildings on site (comprising the former factory building to the rear of the site and buildings which front onto Dolphin's Barn Street (No's 43-50)), which have a total gross floor area of c.3,243.5 sqm.
- The construction of a 1-9 storey Large Scale Residential Development (LRD) comprising 119 no. apartments (70 no. 1 bed units and 49 no. 2 bed units) and a community hub space at ground floor level totalling c.523.5 sqm.
- All apartments are provided with balconies/terraces, which are located on the eastern, western, southern and northern elevations of the building.
- The proposal includes external communal open space areas (c.707 sqm) at ground floor level, and provision of PV panels at roof level.
- The proposal provides a total of 15 no. car parking spaces (12 no. for residents, 2 no. for the community hub, including 1 no. accessible parking space, and 1 no. car sharing space). 172 no. cycle parking spaces are provided for residents, and 60 no. cycle parking spaces are provided for visitors to the residential

element of the development. 2 no. long stay cycle parking spaces, and 6 no. short stay cycle parking spaces are provided associated with the community hub element of the development.

- The proposal includes for alterations and upgrade of the site boundary walls / treatment.
- The proposal includes 1 no. shared pedestrian/ vehicular entrance point from Dolphin's Barn Street, alterations to the public footpath/street along Dolphins Barn Street, the provision of 2 no. ESB sub-station's, plant and storage rooms, a comms room, a LV switch room, a life safety room, bin stores and all associated and ancillary works.
- The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works including hard and soft landscaping; blue/green roofs; boundary treatment; internal roads and footpaths; electrical services; and all associated site development works above and below ground.

1.3.3 Drainage

The following drainage information has been extracted from the Engineering Service Report by JJ Campbell and Associates (2025)

1.3.3.1 Surface Water

There is a 225Ø storm sewer East of the proposed development on Dolphins Barn Street and an existing 300Ø storm sewer on Dolphins Barn Street, close to the Coombe Hospital. These storm networks flow north easterly towards Cork Street.

Surface water runoff from the proposed development will all drain by gravity and will be attenuated prior to discharge into the existing 225Ø surface water sewer on Dolphins Barn Street. This flows north-easterly, ultimately leading to the Liffey, and Dublin Bay.

Peak surface water runoff will be restricted to 2 litres per second for operation purposes of the Hydro-Brake.

DCC drainage construction standards will be applied to all external spaces which are to be taken in charge by DCC in accordance with the Greater Dublin Regional Code of Practice.

Attenuation for the proposed development will be via the Green and Blue Roof, Tree Pits and Wavin Aquacells or similar approved system at ground level.

1.3.3.1.1 Sustainable Drainage Systems (SUDS)

All storm drainage work within the proposed development lands shall be designed as constructed in accordance with the following:

- SUDS strategy
- GDSDS
- CIRIA SUDS Manual C753

The following SUDS techniques will be incorporated into the design:

- Permeable paving at car parking bays
- Porous asphalt for access road, Roadstone Duraflow
- Green and Blue Roof
- Tree Pits

1.3.3.1.1.1 SUDS Management Train

By passing water through several stages of treatment, sediment and other pollutants will be removed and maintenance costs are reduced.

1. The topmost roof and lower terraces shall be a minimum of 70% Green and 100% Blue roofs, intercepting / treating the first 5mm of rainfall and also attenuating storm water.
2. All car parking spaces shall be permeable paving, intercepting / treating the first 5mm of rainfall. Even if the soil has poor infiltration some infiltration will take place in the stone below the areas and the overflow pipe will retain flow which will slowly infiltrate or evaporate.
3. The access road shall be porous / permeable asphalt, intercepting / treating the first 5mm of rainfall. Even if the soil has poor infiltration some infiltration will take place in the stone below the areas and the overflow pipe will retain flow which will slowly infiltrate or evaporate.
4. Soft landscaping shall allow interception / treatment. Soft landscaping shall also incorporate tree pits which provide long term SuDS benefits such as attenuating surface water and filtering out pollutants.
5. 6 No SuDS tree pits are proposed for the development

Storm water discharging to the Green and Blue roofs are attenuated on the roofs. Storm water discharging to the ground and other surfaces is attenuated in Wavin Aquacells at ground level, and the 6 Tree Pits.

Interception and treatment storage will be provided by the Green and Blue roofs, permeable parking / permeable gravel path and porous asphalt access path at ground level, additional interception storage will be provided by the soft landscaping at ground level.

A hydrobrake will be fitted to the outfall manhole to control outflow.

1.3.3.2 Foul Drainage

There are two existing foul sewer networks in proximity to the Site; a 300Ø foul sewer east of the subject development on Dolphins Barn Street, and a 900Ø foul sewer on Dolphins Barn Street, close to the Coombe Hospital. Both sewers discharge in a north easterly direction towards Cork Street ultimately leading to Ringsend Wastewater Treatment Plant (WwTP).

Foul water from the proposed development will all drain by gravity and will be designed to take discharges from the new residential and associated community hub at ground floor.

The foul system will connect to the existing 300Ø foul sewer east of the proposed development on Dolphins Barn Street. Discharge rates shall be calculated using Irish

Water Code of Practice. Confirmation of feasibility was received from Irish Water confirming the existing Watermain and Foul network has capacity for the Proposed Development.

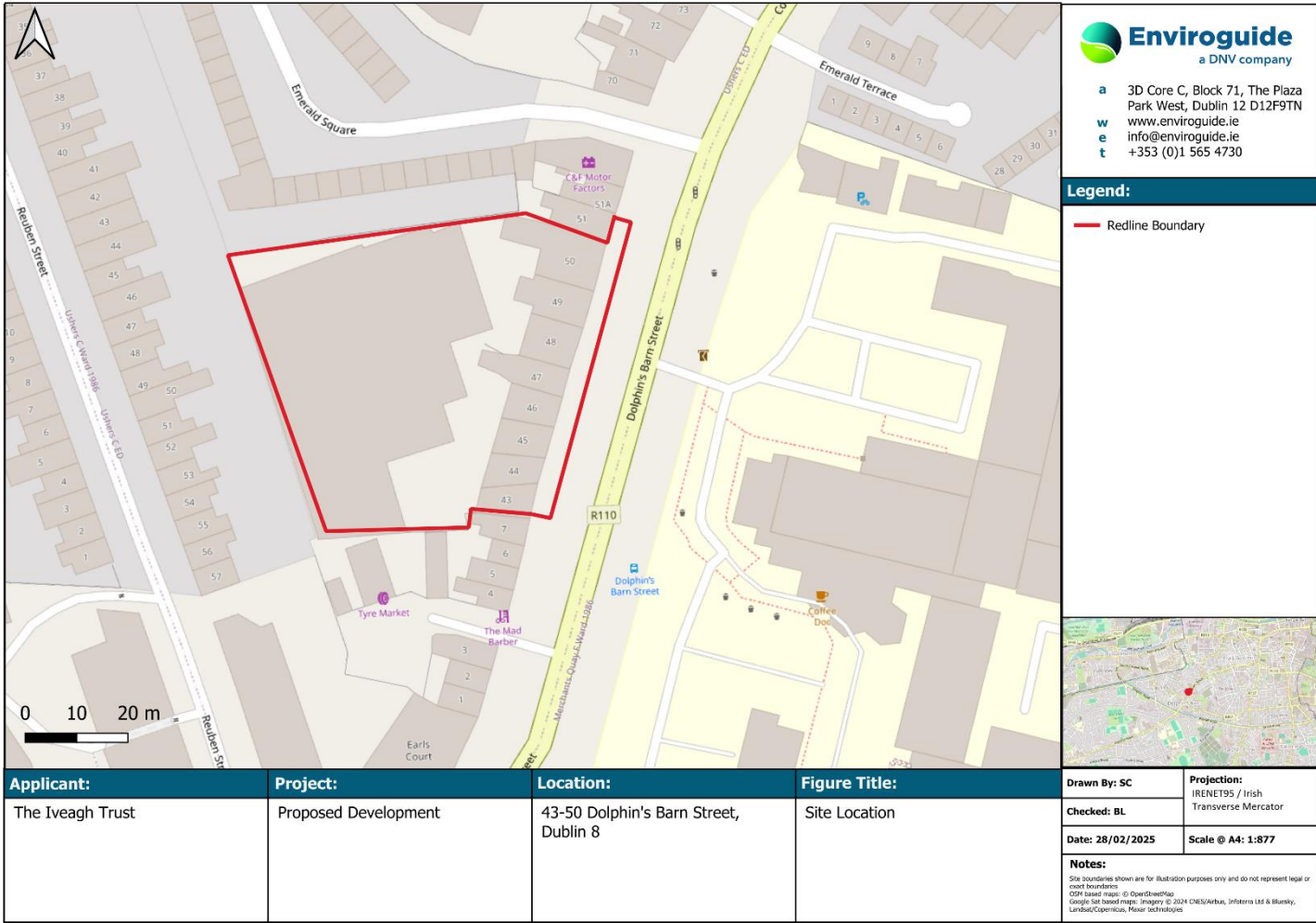


FIGURE 1. SITE LOCATION.



FIGURE 2. PROPOSED SITE LAYOUT (C+W O' BRIEN ARCHITECTS, PROPOSED GROUHD FLOOR GA PLAN, DRAWING No. 2100).

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

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

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

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

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

2.1.1 Legislative Context

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

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

The obligations in relation to AA have been implemented in Ireland under the Planning and Development Act 2024. Chapter 3 of Part 6 of the Act provides a detailed framework for the

AA of '*Development and Proposed Development*' to ensure compliance with the Habitats Directive and the Birds Directive¹.

The relevant sections in relation to screening for AA have been summarised below:

Section 212 of the Planning and Development Act 2024 mandates that the competent authority must conduct a screening for appropriate assessment of relevant development projects². This applies to developments that are not directly connected with, or necessary for, the management of a European site, but which have the potential to cause a significant impact.

1. **Subsection (1)** specifies that the screening is required for:
 - Applications for permission for relevant developments.
 - Determining if the Proposed Development, individually or in combination with other plans or projects, is likely to significantly affect a European site, considering its conservation objectives.
2. **Subsection (2)** extends the screening requirement to:
 - Alterations or extensions of permissions for development.
 - Determining if such changes, individually or in combination with other plans or projects, are likely to significantly affect a European site, considering its conservation objectives.
3. **Subsection (3)** allows the competent authority to:
 - Request additional information or clarification from the applicant.
 - Consult with appropriate persons to facilitate the screening process.
4. **Subsection (4)** states that if the applicant fails to provide the requested information within the specified period, the competent authority may refuse to grant permission.

The Appropriate Assessment (AA) screening under Section 212 can result in several determinations:

1. **No Likely Significant Effect:** If the screening concludes that the Proposed Development, either alone or in combination with other plans or projects, is not likely to have a significant effect on a European site, considering its conservation objectives, the project can proceed without further assessment.

¹ A framework for Appropriate Assessment of Plans is given in Chapter 2 of Part 6 of the Planning and Development Act 2024.

² In the context of the Planning and Development Act 2024, a "relevant development" generally refers to any project or activity that requires planning permission and has the potential to impact the environment, particularly European sites. This includes new construction projects; material changes in use; alterations or extensions; and some exempted developments (certain developments that are typically exempt from requiring permission but may still need to be assessed if they impact European sites). Further details can be found in Part 2 of the Act.

2. **Likely Significant Effect:** If the screening determines that the Proposed Development is likely to have a significant effect on a European site, an Appropriate Assessment must be carried out. This involves a more detailed examination of the potential impacts on the site's conservation objectives and the preparation of a Natura Impact Statement (NIS).
3. **Insufficient Information:** If the competent authority finds that there is insufficient information to make a determination, it can request additional information from the applicant. The screening process will be paused until the necessary information is provided.
4. **Refusal Due to Non-Compliance:** If the applicant fails to provide the requested information within the specified timeframe, the competent authority may refuse to grant permission for the development.

These determinations ensure that any potential impacts on European sites are thoroughly considered and addressed, promoting sustainable development and environmental protection.

Where a NIS is required, the report may be prepared and submitted by the applicant as part of the application for permission.

For full details of the Planning and Development Act 2024 in relation to AA Screening (including details of AA for plans and local or state authority developments), please refer to the full Planning and Development Act 2024 documentation available on the Irish Statute Book website³.

2.1.2 Consideration of Embedded Mitigation in AA

With regard to the consideration of embedded mitigation in the Appropriate Assessment process the following is noted. According to the ruling delivered in open court in Luxembourg on 15th June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

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

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

³ <https://www.irishstatutebook.ie/eli/2024/act/34/enacted/en/print>

2.2 Policy Context

2.2.1 Dublin City Development Plan

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

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

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

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

2.2.2 Dublin City Biodiversity Action Plan

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

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

Within each of the five themes there are 7 objectives for biodiversity management and conservation including the following relevant objectives for this AA screening:

- Objective 1: Ensure effective implementation of the Dublin City Biodiversity Action Plan

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

2.3 Stages of Appropriate Assessment

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

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

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

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

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

3 AA SCREENING METHODOLOGY

3.1 Guidance

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

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

3.2 Screening Steps

Screening for AA involves the following steps:

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

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

3.3 Desk Study

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

- Information on the network of European Sites, boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie;
- Text summaries of the relevant European sites taken from the respective Standard Data Forms (available at <https://natura2000.eea.europa.eu/>) and Site Synopses (available at www.npws.ie);
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.qis.epa.ie;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at www.gsi.ie;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the Dublin City Council online planning database (dublincity.ie/residential/planning) and the National Planning Database (DHLGH, 2023).

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

3.4 Field Surveys

A range of field surveys have been carried out at the Site to date. These are summarised in Table 2. For full details on the methods and results of the fields surveys listed, please refer to the Ecological Appraisal (EA) accompanying this application under separate cover. All surveys were carried out at the appropriate time of year by suitably qualified ecologists. No limitations to field surveys were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development. Results relevant to this Screening Report have been summarised in section 4.1.2.

TABLE 2. FIELD SURVEYS UNDERTAKEN AT THE PROPOSED DEVELOPMENT SITE.

Survey	Surveyor	Dates
Preliminary Habitat and Invasive Flora Survey	Enviroguide Consulting (SC)	28 th of May 2024
Preliminary Habitat Appraisal and Bat Roost Inspection	Enviroguide Consulting (SC)	28 th of May 2024

3.5 Identification of Relevant European Sites

The Zone of Influence (ZOI) for a project is the area over which ecological features may be affected by changes as a result of a development and associated activities. This is likely to

extend beyond the development site, for example where there are ecological or hydrological links beyond the site boundaries (CIEEM, 2018). Furthermore, ZOI in relation to European sites is described as follows in the 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021):

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

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

The relevant European sites were identified based on the following:

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

3.6 Assessment of Significant Effects

The conservation objectives of the European sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed

Development has the potential to have a negative impact on any of the QIs and/or conservation objectives listed for the site.

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

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

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

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

3.7 Limitations

Due to health and safety concerns, it was not possible to observe the rooftops on the 28th of May 2024 and it is possible that nesting opportunities for gull species are present. This has been considered in the design and mitigations and as such, is not a limitation that would prevent a conclusive ecological appraisal being drawn at the Site.

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

4 STAGE 1 SCREENING ASSESSMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology, Geology and Hydrogeology

The Site is located in the Liffey and Dublin Bay (Catchment ID_09) and in the Dodder_SC_010 Sub-catchment (Sub-catchment I.D.09) (EPA, 2025).

The closest waterbodies to the Site are the Grand Canal (IE_09_AWB_GCMLE) which is 343m south, Poddle (IE_EA_09P030800) which is culverted under the city, located 896m east, Camac (IE_EA_09C020500), located 872m northwest of the Site, and the Liffey Estuary Upper (IE_EA_090_0400) 1.3km north of the Site. All waterbodies surrounding the Site flow into the Liffey Estuary ultimately leading into Dublin Bay (IE_EA_090_0000) (EPA, 2025).

The EPA water quality monitoring data for the stations on the Liffey Estuary Upper and the Camac River located closest to the Site is summarised in Table 3. The reported Q-value results indicate that water quality in the Liffey Estuary Upper in the vicinity of the Site is poor. The EPA data indicates that the lack of pollution sensitive macroinvertebrate fauna and dominance of pollution tolerant taxa were the main drivers of Q-value for the watercourse for the period 2016-2021 in this area. (EPA, 2025).

TABLE 3. EPA MONITORING STATIONS AND ASSIGNED Q VALUES.

EPA Monitoring Station name	Station Code	Location from Site	Distance from Site	Assigned Q value
LIFFEY - Islandbridge-UCD Boat Club	RS09L012400	North upstream	2.089km	3 "Poor"
Camac Close Emmet Rd	RS09C020500	North-west upstream	1.96km	3 "Poor"

The Site of the Proposed Development is situated on the Dublin (IE_EA_G_008) groundwater body. The bedrock aquifer identified beneath the Site is mapped as "Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones" (LI) (GSI, 2025).

The Groundwater Vulnerability Rating assigned to groundwater beneath the Site is mapped as "Moderate" (M) (GSI, 2025).

The soil beneath the majority of the Site is mapped as "Urban – soil concreted over" and the subsoil at the Site is mapped as *man-made* (EPA, 2025), to be expected within Dublin City.

The Waterbody Status for river, groundwater, transitional and coastal water bodies relevant to the Site as recorded by the EPA (2023) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003), Part IV of the European Communities Environmental Objectives (Surface Waters) Regulations 2009 and Part IV of the European Communities Environmental Objectives (Groundwater) Regulations 2010, are provided in Table 4.

TABLE 4. WFD RISK AND WATER BODY STATUS.

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km)	WFD water body status (2016-2021)	WFD 3 rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
The Grand Canal Main Line (Liffey and Dublin Bay)	IE_09_AWB_GCMLE	South	0.36	Good	Not At risk	Not Connected to Site
Camac_040	IE_EA_09C0_20500	North-west	0.91	Poor	At risk	Not Connected to Site
Poddle_010	IE_EA_09P0_30800	East	0.94	Poor	At risk	Not Connected to Site
Liffey Estuary Upper	IE_EA_090_0400	North	1.29	Good	Under Review	Downstream of Site drainage
Liffey Estuary Lower	IE_EA_090_0300	North-east	3.14	Moderate	At risk	Downstream of Site Drainage
Coastal Water Bodies						
Dublin Bay	IE_EA_090_0000	East	7.67	Good	Not at Risk	Downstream of Site Drainage
Groundwater Bodies						
Dublin Groundwater Body	IE_EA_G_07_6	N/A	N/A	Good	Under Review	Underlying groundwater-body

4.1.2 Relevant Field Survey Results

4.1.2.1 Habitats & Flora

The site consists of mostly concreted over ground and buildings. One invasive plant species, namely butterfly bush (*Buddleja davidii*) was recorded onsite. A Site-specific Invasive Species Management Plan (ISMP) was therefore prepared and included under separate cover (Enviroguide, 2024).

There were no QI habitats associated with designated sites found at the Site.

4.1.2.2 Fauna

Birds regularly found in urban settings such as feral pigeon (*Columba livia domestica*), robin (*Erithacus rubecula*), and wren (*Troglodytes troglodytes*) were identified during the PEA site walkover. The Site had limited suitable habitat for breeding birds, however there was potential nesting opportunities for gull species on the rooftops of the buildings.

No QI or SCI species associated with designated sites was found at the Site.

4.2 Identification of Relevant European Sites

4.2.1 Potential Sources of Impacts

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

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

- Uncontrolled releases of dust, sediments and/or other pollutants to air due to earthworks;
- Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies or surface water network;
- Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater;
- Waste generation during the Construction Phase comprising soils and construction wastes;
- Increased noise, dust and/or vibrations as a result of construction activity;
- Increased dust and air emissions from construction traffic;
- Increased lighting in the vicinity as a result of construction activity.
- Increased human presence and activity as a result of construction activity.
- Spread of invasive plant species as a result of construction activity.
- Loss of ex-situ habitat for SCI/QI species.

Operational Phase (*Estimated duration: Indefinite*)

- Surface water drainage from the Site of the Proposed Development;
- Foul water from the Proposed Development;
- Increased lighting at the Site and in the vicinity emitted from the Proposed Development.
- Increased human presence and activity at the Site and in the vicinity as a result of the Proposed Development.
- Collision risk to bird species.

4.2.1.1 Potential Pathways to European Sites

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

4.2.1.2 Direct Pathways

4.2.1.2.1 Hydrological Pathways

The Site is hydrologically connected to Dublin Bay via the surface water drainage network, and therefore has a hydrological pathway to the following designated sites:

- South Dublin Bay SAC (000210) 5.4km east of the Site
- South Dublin Bay and River Tolka Estuary SPA (004024) 4.8km northeast of the Site
- North Dublin Bay SAC (000206) 9.3km northeast of the Site
- North Bull Island SPA (004006) 9.3km northeast of the Site
- North-west Irish Sea SPA (004236) 9.3km northeast of the Site

The designated sites listed above are over 7km downstream of the surface water network at the Site. Any potential pollutants entering the storm water sewer network would be significantly diluted prior to its discharge into Dublin Bay. Additionally, the onsite treatment via the proposed SUDS design which includes filtration, the flow control mechanisms and attenuation of surface water at the Site will reduce the likelihood for significant surface water run-off of contaminants

entering the existing drainage systems during operation. Therefore, the downstream distance of over 7km, in addition to the onsite surface water treatment and the dilution factor attributed to this is sufficient to conclude that the hydrological pathway via surface water drainage between the Site and the downstream designated sites as **insignificant**.

The hydrological pathway via the marine environment to three other European sites, namely the Rockabill to Dalkay Island SAC (003000) and Howth Head SAC (000202) and Howth Head Coast SPA (004113) is considered to be insignificant due to the considerable marine buffer between the Proposed Development and these sites.

4.2.1.2.2 Hydrogeological Pathways

During groundworks and other construction activities, the ground will be exposed and any potential accidental discharges to ground could potentially migrate vertically downward to the underlying bedrock aquifer and laterally within the aquifer to any European designated sites in the same ground water body at the Site.

The 'Dublin GWB: Summary of Initial Characterisation' document (GSI, 2023) states "*The general groundwater flow direction in this aquifer is towards the coast and also towards the River Liffey and Dublin City. This aquifer is not expected to maintain regional groundwater flow paths. Groundwater circulation from recharge to discharge points will more commonly take place over a distance of less than a kilometre. The majority of groundwater flow will be a rapid flow in to upper weathered zone but flow in conduits is commonly recorded at depths of 30 to 50 m b.g.l. . The aquifer is not considered to have any primary porosity and flow will be through fractures, some of which will have been enlarged by karstification and dolomitisation. The fissured nature and the moderate permeability of the bedrock close to the surface imply that water will move at high velocities*".

There are no groundwater sensitive habitats or species within 1km of the Site and the Proposed Development has no direct interaction with the groundwater at the Site. It is therefore considered that the likely ZOI via hydrogeological pathways is limited to the immediate habitats. Given the low permeability and local productivity of the underlying aquifer, the man-made nature of the soils on which the Site is situated, it can be determined that there are no European sites connected to the Proposed Development via this pathway. Hydrogeological pathways can be considered **insignificant**.

4.2.1.2.3 Air and Land Pathways

The Site is located within an urban setting with relatively high baseline levels of noise, lighting and human disturbance, therefore the increase in noise, lighting and other human disturbance from the Proposed Development during both the construction and operational phases of the development will be imperceptible.

The likely ZOI via air and land pathways is considered to be limited to surrounding areas within approx. 200-300m from the Site boundary for any noise and dust sources, depending on prevailing weather conditions. Additionally, light spill is considered to be limited to areas within the Site and habitats immediately adjacent to the boundaries.

The intervening distance the Site and the nearest designated sites, namely South Dublin Bay SAC (000210) and South Dublin Bay and River Tolka Estuary SPA (004024) is over 4km. There are therefore no European designated sites within the ZOI of the Proposed

Development therefore air and land pathways can be ruled out at this stage of the development. Direct air and land pathways is considered **insignificant**.

4.2.1.3 Indirect Pathways

No indirect pathways (e.g., disruptions to migratory paths) were identified.

4.2.1.3.1 Indirect Hydrological Pathways

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

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006) and
- Northwest Irish Sea SPA (004236).

All of the above designated sites are over 9km downstream from the Proposed Development.

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

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

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

4.2.1.3.2 Indirect Air and Land Pathways

During the PEA site walkover, no gull species were recorded nesting or utilising the rooftops of the existing buildings of the Site, however the rooftop of the building was not accessed during the survey, therefore the potential presence of nesting gulls cannot be ruled out.

Gull species such as herring gull (*Larus argentatus*) and lesser Black-backed Gull (*Larus fuscus*) commonly utilise flat roof buildings in urban settings for nesting, therefore the buildings at the Site have potential to provide *ex-situ* nesting habitat for these SCI species.

Given the size of the existing buildings at the Site, in the context of Dublin city, and over 5km from the coast, the Site is unlikely to provide nesting habitat of significant importance to the

gulls of the SPA designated sites within Dublin Bay. The existing buildings will be demolished as part of the Proposed Development, however also replaced by new buildings, with flat rooftops of similar suitability. Therefore, there will be no significant long-term losses in nesting habitat for gull species by the Proposed Development. It can therefore be concluded that the potential impacts to *ex-situ* habitat by the Proposed Development will be **insignificant**.

Consideration for gull species and potential nesting habitat is still considered of local ecological importance due to the legal protection of nesting wild birds, therefore consideration for nesting gulls is included as part of the Ecological Appraisal for the Site under a separate cover.

4.2.1.3.2.1 *In-flight Collisions between SCI Birds and Buildings*

The presence of new buildings of up to 8 no. storeys in height may change the baseline environment for bird species in flight over the Site. This is unlikely to pose a potential collision risk for birds commuting back and forth from the coast to inland feeding sites for the following reason: Given the urban landscape of the Site, in Dublin city, the potential impact of in-flight collisions between SCI birds and the proposed buildings can be deemed negligible due to the presence of existing high-rise structures in the vicinity of the Site which precludes interruptions to flight paths above the existing baseline at the Site. The Proposed Development will not be significantly taller than any of the structures in the vicinity and so birds are unlikely to have to rapidly adjust their altitude or direction, and so collision risk is negligible.

Additionally, bird collision with buildings is generally associated with reflective material such as windows or large surfaces of glass which create a mirror and appear to show the continuation of the sky or surrounding landscape, an effect that can be exacerbated by lighting. Whilst the design of the facades of the dwellings do include windows, no large surfaces of glass are proposed. Rather the overall façades of the proposed buildings are well broken up, with a varied material composition interspersing any reflective areas. These architectural design features provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. This overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is negligible.

These architectural design features are part of the overall design of the Proposed Development and are not considered to represent specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard. It is noted that birds are not deemed to be at any particular risk of collisions with the proposed buildings at the Site.

4.2.2 Relevant European Sites

A European site will only be at risk from likely significant effects where a S-P-R link exists between the Proposed Development Site and the European site. The preceding steps did not identify any S-P-R links of note, and therefore no further assessment is required. All of the European sites considered under the S-P-R method are listed in Table 5 and shown in Figure 5 for information purposes.

TABLE 5. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. THOSE SITES WITH NOTABLE S-P-R LINKS ARE HIGHLIGHTED IN GREEN (IF ANY). QUALIFYING INTERESTS

(QIs) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (EEA, 2023)⁴.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
Special Areas of Conservation (SAC)		
North Dublin Bay SAC (000206) Linear Distance to Proposed Development: approx. 9.3km NE	As per NPWS (2013b) • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • <i>Salicornia</i> and other annuals colonising mud and sand [1310] • Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] • Mediterranean salt meadows (<i>Juncetalia maritima</i>) [1410] • Embryonic shifting dunes [2110] • Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] • Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] • Humid dune slacks [2190] • <i>Petalophyllum ralfsii</i> (Petalwort) [1395]	Weak direct and indirect hydrological pathway deemed insignificant due to downstream distance and water treatment.
South Dublin Bay SAC (000210) Linear Distance to Proposed Development: approx. 5.4km E	As per NPWS (2013a) • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • <i>Salicornia</i> and other annuals colonising mud and sand [1310] • Embryonic shifting dunes [2110]	Weak direct and indirect hydrological pathway deemed insignificant due to downstream distance and water treatment.
Special Protection Areas (SPAs)		
North Bull Island SPA (004006) Linear Distance to Proposed Development: approx. 9.3km NE	QIs as per NPWS (2015b) • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] • Shelduck (<i>Tadorna tadorna</i>) [A048] • Teal (<i>Anas crecca</i>) [A052] • Pintail (<i>Anas acuta</i>) [A054] • Shoveler (<i>Anas clypeata</i>) [A056] • Oystercatcher (<i>Haematopus ostralegus</i>) [A130] • Golden Plover (<i>Pluvialis apricaria</i>) [A140]	Weak direct and indirect hydrological pathway deemed insignificant due to downstream distance and water treatment. The greyfield nature of the Permitted Development precludes suitability for any of these SCI species, while the

⁴ Where applicable, the full species list included in this table is as per the latest updated information as indicated, so either the Conservation Objectives (CO) document for the site, or the latest Standard Data Form (SDF) (EEA, 2023). For SDF updates, CO are not yet available for the newly added species but are assumed, for the purposes of assessment, to follow the same format as for other feature species.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
	• Grey Plover (<i>Pluvialis squatarola</i>) [A141] • Knot (<i>Calidris canutus</i>) [A143] • Sanderling (<i>Calidris alba</i>) [A144] • Dunlin (<i>Calidris alpina</i>) [A149] • Black-tailed Godwit (<i>Limosa limosa</i>) [A156] • Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] • Curlew (<i>Numenius arquata</i>) [A160] • Redshank (<i>Tringa 25etanus</i>) [A162] • Turnstone (<i>Arenaria interpres</i>) [A169] • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] • Wetland and Waterbirds [A999]	presence of existing high rise structures precludes interruptions to flight paths above the existing baseline at the Site.
North-west Irish Sea SPA (004236) Linear Distance to Proposed Development: approx. 9.3km NE	QIs as per NPWS (2023) • Red-throated Diver (<i>Gavia stellata</i>) [A001] • Great Northern Diver (<i>Gavia immer</i>) [A003] • Fulmar (<i>Fulmarus glacialis</i>) [A009] • Manx Shearwater (<i>Puffinus puffinus</i>) [A013] • Cormorant (<i>Phalacrocorax carbo</i>) [A017] • Shag (<i>Phalacrocorax aristotelis</i>) [A018] • Common Scoter (<i>Melanitta nigra</i>) [A065] • Little Gull (<i>Larus minutus</i>) [A177] • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] • Common Gull (<i>Larus canus</i>) [A182] • Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] • Herring Gull (<i>Larus argentatus</i>) [A184] • Great Black-backed Gull (<i>Larus marinus</i>) [A187] • Kittiwake (<i>Rissa tridactyla</i>) [A188] • Roseate Tern (<i>Sterna dougallii</i>) [A192] • Common Tern (<i>Sterna hirundo</i>) [A193] • Arctic Tern (<i>Sterna paradisaea</i>) [A194] • Little Tern (<i>Sterna albifrons</i>) [A195] • Guillemot (<i>Uria aalge</i>) [A199] • Razorbill (<i>Alca torda</i>) [A200] • Puffin (<i>Fratercula arctica</i>) [A204]	Weak direct and indirect hydrological pathway deemed insignificant due to downstream distance and water treatment. The greyfield nature of the Permitted Development precludes suitability for SCI species. Ex-situ habitat for gulls ruled out due to the size and nature of the Proposed Development while the presence of existing high rise structures precludes interruptions to flight paths above the existing baseline at the Site.
South Dublin Bay and River Tolka Estuary SPA (004024) Linear Distance to Proposed Development: approx. 4.8km NE	QIs as per NPWS (2015a) • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] • Oystercatcher (<i>Haematopus ostralegus</i>) [A130] • Ringed Plover (<i>Charadrius hiaticula</i>) [A137] • Grey Plover (<i>Pluvialis squatarola</i>) [A141] • Knot (<i>Calidris canutus</i>) [A143] • Sanderling (<i>Calidris alba</i>) [A144] • Dunlin (<i>Calidris alpina</i>) [A149] • Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] • Redshank (<i>Tringa totanus</i>) [A162]	Weak direct and indirect hydrological pathway deemed insignificant due to downstream distance and water treatment. The greyfield nature of the Permitted Development precludes suitability for of these SCI species. Ex-situ habitat for gulls ruled out due to the size and nature of the

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
	• Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] • Roseate Tern (<i>Sterna dougallii</i>) [A192] • Common Tern (<i>Sterna hirundo</i>) [A193] • Arctic Tern (<i>Sterna paradisaea</i>) [A194] • Wetland and Waterbirds [A999]	Proposed Development while the presence of existing high rise structures precludes interruptions to flight paths above the existing baseline at the Site.

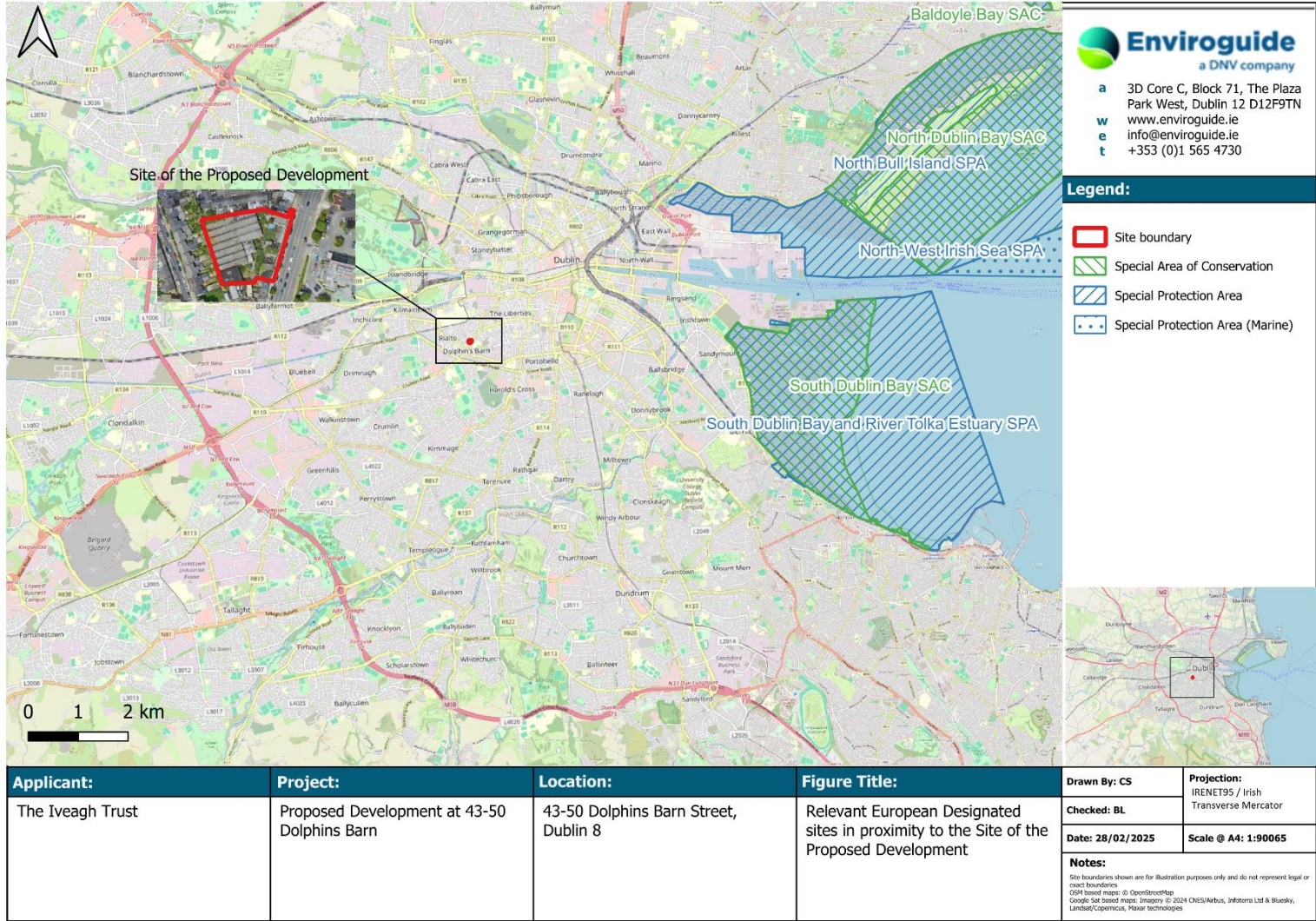


FIGURE 3. LOCATION OF EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT.

4.3 Assessment of Likely Significant Effects

As stated in the preceding section, no S-P-R links of note between the Proposed Development and any European sites were identified, and therefore no further assessment is required to assess the potential for significant impacts from the Proposed Development alone.

4.3.1 Potential for In-combination Effects

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

4.3.1.1 Existing Planning Permissions

A search of planning applications located within a 300m radius of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie) and Dublin City Council Planning Applications online map. Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

It is noted that the majority of the few developments within the vicinity of the Site of the Proposed Development are applications granted for small scale modifications and extensions of existing buildings. The larger developments in the vicinity of the Proposed Development are outlined in Table 6:

TABLE 6. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 300 M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
TA29S.308917	An Bord Pleanála	Granted with Conditions 15/04/2021	Player Wills, Dublin City Council Lands at South Circular Road, Dublin 8
Development Description Demolition of all buildings excluding the original fabric of the former Player Wills Factory, construction of 492 no. Build to Rent apartments, 240 no. Build to Rent shared accommodation along, creche and associated site works.			
Potential for In-combination effects This site is approximately 150m west of the Site. As the construction of this site is in phases estimating up to 42 months, this is likely still in construction phase. An AA screening was prepared for the overall masterplan, which concluded that there would be no significant impacts to any designated sites due to the distance from the site, and the insignificant hydrological pathways. Due to the designated sites being outside of the ZOI from both of			

these sites, should the construction phase of the sites overlap, this is still unlikely to have a significant impact on the designated sites in proximity to the Site.			
TA29S.307221	An Bord Pleanála	Granted with Conditions 14/09/2020	Former Bailey Gibson Site 326-328 South Circular Road, Dublin 8.
Development Description Demolition of all structures, construction of 416 no. residential units (4 no. houses, 412 no. apartments) and associated site works Potential for In-combination effects This site is under 200m west of the Site. As the construction of this site is in phases estimating up to 36 months. An AA screening was prepared for the overall masterplan, which concluded that there would be no significant impacts to any designated sites due to the distance from the site, and the insignificant hydrological pathways. Due to the designated sites being outside of the ZOI from both of these sites, should the construction phase of the sites overlap, this is still unlikely to have a significant impact on the designated sites in proximity to the Site. The combined increase of surface and foul water is unlikely to have a significant impact on downstream designated sites due to the distance and scale of the developments.			

4.3.1.2 Relevant Policies and Plans

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

4.3.1.3 Operations at Ringsend WwTP

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

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

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

In June 2018 Irish Water applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WwTP facility. The first phase of upgrade works to Ringsend WWTP was completed in December 2021, which increased the capacity of the plant by 400,000 P.E. These works, together with the future works permitted will ultimately increase the capacity of the facility from 1.6 million P.E. to 2.4 million P.E. by 2025 (Irish Water website: <https://www.water.ie/projects/local-projects/ringsend/>).

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

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

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

*"In the operational phase, the proposed upgrade of the Ringsend WwTP Component will result in an increase in the plant capacity and also an improvement in the final effluent quality. This will result in a reduction in the licensed parameters discharged into the receiving water, with significantly reduced quantities in respect of ammonia and phosphorous."*⁵

This NIS goes on to state as follows:

*"Overall no significant adverse effects on are foreseen and indeed, a slight positive effect is possible. Effects of discharge during the operational phase of the project from the upgrade project will therefore have imperceptible impact on habitats listed within these European sites."*⁶

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

*"Thus, there is no potential for in-combination impacts of any other plan and project with the Ringsend WwTP Component of the proposed Upgrade Project."*⁷

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

The EIAR carried out in relation to said upgrade concluded that in the 'do nothing' scenario, i.e., wherein the upgrade is not carried out; the current existing levels of

⁵ Section 4.5.1 at page 32.

⁶ Section 4.5.1 at page 33.

⁷ Section 4.5.1 at page 34

nutrient input to Dublin Bay as a result of stormwater overflow from the WwTP, are not deemed to pose significant threats to the integrity of European sites located within or adjacent to Dublin Bay, or any of their Conservation Objectives regardless of said upgrade.

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

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

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

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

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
North Dublin Bay SAC (000206)	No	No	No	None	None	None	NO
South Dublin Bay SAC (000210)	No	No	No	None	None	None	NO
SPA							
North Bull Island SPA (004006)	No	No	No	No	No	No	NO
North-west Irish Sea SPA (004236)	No	No	No	None	None	None	NO
South Dublin Bay and River Tolka Estuary SPA (004024)	No	No	No	None	None	None	NO

5 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at 43-50 Dolphins Barn Street, Dublin 8 has been assessed taking into account:

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

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

- North Dublin Bay SAC (000206)
- South Dublin Bay SAC (000210)
- North Bull Island SPA (004006)
- North-west Irish Sea SPA (004236)
- South Dublin Bay and River Tolka Estuary SPA (004024)

In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required.

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