Proposed Amendments to Permitted Development at the former Player Wills Site, Dublin 8

Appropriate Assessment Screening Report

Environmental Assessment

Built Environment

Client: CWTC Multi-Family ICAV acting solely in respect of its sub fund the DBTR-SCR1 Fund

Date: 09 October 2026

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1 Introduction

1.1 Background

Planning permission was granted by An Bord Pleanála[1] (ABP Reg. Ref.: ABP-308917-20, DCC Ref: SHD0031/20) on 15 April 2021 for a Strategic Housing Development (SHD) at the former 'Player Wills' site located at South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8.

The parent permission has been amended once (Dublin City Council (DCC) Reg. Ref.: 3406/25). That development comprised amendments to the permitted development (the omission of a basement level and the consolidation of parking).

As part of the permitted parent application, an Appropriate Assessment (AA) Screening Report was prepared by Brady Shipman Martin. The AA Screening Report was based on information collected at the time of its writing in December 2020 and concluded that the development would not result in any likely significant effects on any European sites. The full AA Process (involving the preparation of a Natura Impact Statement) was not required. This was also the conclusion of An Bord Pleanála in its planning reports.

An AA screening report was also prepared for the first amendment application, subsequently permitted. In its Planner's Report DCC confirmed that *there are no further environmental considerations having regard to the initial assessment detailed in the previous main report.*

Brady Shipman Martin has now been commissioned by the applicant, CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR SCR1 Fund, to prepare a report to assist DCC in undertaking a screening exercise for Appropriate Assessment (AA) for a second amendment to the permitted development. The purpose of the screening exercise is to assess, in view of best scientific knowledge, if the proposed development (in this case, minor amendments to the permitted development), individually or in combination with other plans or projects, is likely to have a significant effect on European sites, taking into account their conservation objectives.

This document constitutes the Appropriate Assessment Screening Report ("AA Screening Report") prepared for this purpose.

A comprehensive study was undertaken and the potential for significant effects on European sites, both as a result of the proposed amendments to the permitted development and in-combination with other plans and projects, is appraised in this report.

1.2 A note on the scope of this AA screening report

Other than the minor amendments proposed (refer to **Section 3.2** and to the separate planning report prepared by Brady Shipman Martin), no other changes to the plans and particulars of the permitted development, as amended, are proposed or requested.

The baseline environment in the vicinity of the site has evolved since permission was granted in 2021, with the commencement of construction of the permitted development itself as well as enabling works completion on the neighbouring the Bailey Gibson site, permitted under ABP Reg. Ref: 307221-20, as

[1] Now An Coimisiún Pleanála

extended by DCC Reg. Ref.: SHD0009/20/X1 and construction of the LDA Donore Project, permitted under ABP Reg. Ref: ABP-315306-22.

- As noted above there has been one amendment made to the permitted development since the completion of the initial environmental assessments. (DCC Reg. Ref.: 3406/25).
- As confirmed in this report there have been no significant changes to the environmental and scientific data (including both the baseline ecological information at the site, and in the context of the European sites within the zone of influence of the permitted development), that could result in any changes to the conclusions of the previously submitted Appropriate Assessment Screening reports.
- As confirmed in this report there are no projects that have been undertaken (or are currently in planning) in the vicinity of the site that may, or are likely to, have an impact on the outcomes reached in the original assessments.

A review of any changes to the conservation objectives of the European sites within the Zone of Influence (defined in Section 4.2) since the original planning permission was granted has been carried out. It has informed this AA Screening Report. This includes an updated review of in-combination effects as well.

1.3 Expertise and Qualifications

This report has been prepared by Senior Associate and Senior Ecologist, Matthew Hague BSc MSc Adv. Dip. Plan. & Env. Law CEnv MCIEEM. Matthew is a highly experienced and qualified ecologist, with a master's degree in Ecosystem Conservation and Landscape Management. He has over 20 years of experience in ecological and environmental consultancy, across a wide range of sectors. Matthew is a Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Matthew has also completed an Advanced Diploma in Planning and Environmental Law, at King's Inns and is a member of the Irish Environmental Law Association (IELA).

1.4 Legal requirement for Appropriate Assessment

European sites make up a network of sites designated for nature conservation under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the "Birds Directive"). The requirements for Appropriate Assessment are set out under Article 6 of the Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)[2] (the "Birds and Natural Habitats Regulations") and the Planning and Development Act, 2000 (as amended) (the "Planning Acts").

European sites are also known as Natura 2000 Sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)). As defined in section 177R of the Planning Acts "European site" means:

(a) a candidate site of Community importance,
(b) a site of Community importance,
(ba) a candidate special area of conservation,
(c) a special area of conservation,
(d) a candidate special protection area and

[2] SI No. 477 of 2011

(e) a special protection area.

Article 6(3) of the Habitats Directive states that:

> *"(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have 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 first test is to establish whether, in relation to a particular plan or project, appropriate assessment is required. Section 177U of the Planning Acts requires that screening for appropriate assessment must be carried out:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site;
- An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

The project is not required for the management of any European Site and this AA Screening Report has been prepared in accordance with the requirements of the Birds Directive, the Habitats Directive, the Planning Acts and the Birds and Natural Habitats Regulations.

2 Methodology

2.1 Guidelines

This report takes the following guidance documents into account:

- Chartered Institute of Ecology and Environmental Management (CIEEM). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine,* September 2018, updated in September 2019 (V1.1), further updated in April 2022 (V1.2) and again in September 2024 (V1.3).
- Department of Environment, Heritage and Local Government (DoEHLG) (2010a). *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities.*
- DoEHLG (2010b). *Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.*
- European Commission (2021). *Assessment of plans and projects in relation to Natura 2000 sites- Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC.*
- European Commission (2019). *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC.*
- Directorate – General for Environment (European Commission), (2021). *Guidance document on the strict protection of animal species of Community Interest under the Habitats Directive*.

- National Roads Authority (NRA)[3] (2009). *Guidelines for Assessment of Ecological Impacts of National Road Schemes.*
- Office of the Planning Regulator (OPR) (2021). *Practice Note PN01 Appropriate Assessment Screening for Development Management.*

The report also complies with the following legislative instruments:

- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive").
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the "Birds Directive").
- European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) (S.I. No. 477 of 2011).
- The Wildlife Acts 1976 and 2000 (as amended).

2.2 Baseline Data Collection

The desk-based assessment of the site of the proposed development (that is, the amendments to the permitted development) and its environs was undertaken in September and October 2026. The appraisal focussed on habitats and species that are listed as Qualifying Interests (QIs) (in the case of SACs) and Special Conservation Interests (SCIs) (in the case of SPAs) for European sites. It included an assessment of habitat suitability for species with links to European sites, in order to appraise the potential for *ex-situ* effects on European sites.

Comprehensive ecological surveys were undertaken at the site by Matthew Hague of Brady Shipman Martin in the preparation of the planning application for the permitted development, in 2019 and 2020. The surveys undertaken then included habitat, botanical, invasive species, mammal and day-time bat surveys on 5 and 21 May 2019. In addition, dedicated dawn and dusk bat surveys were undertaken at the site on 19/20 August 2019 and 3/4 September 2020 by specialist bat ecologist Mr Brian Keeley of Wildlife Surveys Ireland (WSI). Additional site surveys were undertaken by the author on 11 February, 4 March and 29 September 2020. There are no bat species listed as QI in any European sites within the Zone of Influence. However, Article 12 of the Habitats Directive requires Member States to take requisite measures to establish a system of strict protection of animal species listed in Annex IV(a) in their natural range, and bats (as well as otters, also listed on Annex IV(a) of the Habitats Directive) are therefore considered in this report.

Since planning permission was granted in 2021, additional surveys were carried out by the authors and WSI on multiple dates between December 2021 and October 2024.

A further site visit was carried out by Matthew Hague of Brady Shipman Martin on 15 September 2025, in order to inform the AA screening report for the first amendment, now permitted.

A final site visit was carried out by Mr Hague on 8 October 2026 in the preparation of this report.

Reference is made where necessary to the previously submitted AA Screening Reports.

Information was collated from the organisations and websites listed below:

[3] Now Transport Infrastructure Ireland (TII).

- Data on European sites and rare and protected plant and animal species contained in the following databases:
  - The National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage (www.NPWS.ie).
  - The National Biodiversity Data Centre (NBDC) (www.biodiversityireland.ie).
  - BirdWatch Ireland (www.birdwatchireland.ie).
  - Bat Conservation Ireland (www.batconservationireland.org).
- Recent and historical OSi mapping and aerial photography, including www.geohive.ie.
- Information on local watercourses from www.catchments.ie.
- Information on water quality in the area (www.epa.ie).
- Information on soils, geology and hydrogeology in the area (www.gsi.ie).
- Information on the Status of EU Protected Habitats and Species in Ireland (Article 17 report) (NPWS, August 2025).
- Ireland's 4th National Biodiversity Plan 2023 – 2030 (Department of Housing, Local Government and Heritage, 2024).
- Dublin City Development Plan 2022 – 2028 including the accompanying Appropriate Assessment documentation (Natura Impact Report).

The report takes full account of the design of the proposed amendments and a detailed examination of all relevant elements of the project, as it currently stands, was undertaken.

3 Description of the Permitted Development

3.1 Site Location

The permitted development site at Player Wills (refer to **Figure 3.1** and the drawings that accompany the application) is bounded to the south by South Circular Road and to the east by existing residential development and St. Catherine's School. St. Teresa's Church lies immediately to the north. To the west (and outside of the proposed development area) is a large site of open land (the 'Boys Brigade' land), currently being developed by the LDA as part of the 'Donore Project' (ABP Reg. Ref.: 315306-22). To the west of the subject site is the former 'Bailey Gibson' site (permitted under ABP Reg. Ref: 307221-20, as extended by DCC Reg. Ref.: SHD0009/20/X1).

The Player Wills site is virtually entirely comprised of buildings and artificial surfaces. With the exception of small patches of ruderal plants, some isolated pockets of buddleia scrub and occasional small sycamore trees and an area of bramble scrub and isolated trees along the northern boundary (adjoining St. Teresa's Church and outside the boundary of the permitted development), there are no vegetated habitats of any description on the site.

Although there are numerous buildings on the site, including the old Player Wills factory itself, the multiple bat surveys undertaken recorded no evidence of any use of the site by roosting bats. Similarly, there is no evidence of nesting birds with the exception of feral pigeons on the site.



Figure 3.1 - Location of the proposed amendments in the wider context of the permitted development [REPLACE]

3.2 Proposed amendments to the permitted development

The proposed development consists of amendments to the development at the former 'Player Wills' site, South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8, as permitted under ABP-308917-20 (DCC Ref: SHD0031/20) and as amended under DCC Reg. Ref.: 3406/25. The proposed amendments relate only to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only.

The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5.

Full details are included in the planning report and other documents that accompany the planning application.

4 Screening for Appropriate Assessment

4.1 Background

The first part of the Appropriate Assessment process is the Screening phase. Screening identifies the likely effects of a proposed development on European sites that could arise, either alone or in combination with other plans or projects and considers whether these impacts are likely to have a significant effect on the European site in view of the site's conservation objectives.

In accordance with section 177U of the Planning Acts, screening for appropriate assessment must be carried out:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site.
- An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

Screening must be undertaken without the inclusion of mitigation and it is in this context that this AA Screening Report is prepared.

In addition to the foregoing, OPR's Practice Note "*Appropriate Assessment Screening for Development Management*", dated March 2021 – also details a number of key concepts relevant to AA Screening, including "*Best Scientific Knowledge/Information in the Field*" (pg.5), stating:

> *"The screening determination must be based on scientific information relevant to the likely effects on the conservation objectives of the relevant European sites. The information should be up-to-date and based on the best available techniques and methods to estimate the presence and extent of effects. This is because if there is any scientific uncertainty as to the absence of significant effects, the project must be screened in for appropriate assessment.*
>
> *In the vast majority of cases the information provided by the applicant (including the project description) and publicly available information in relation to the European sites in question and information published by the NPWS, the EPA and others in relation to such sites, should provide a sufficient level of objective scientific information to allow the planning authority to make an informed decision on screening."*

Following screening therefore, if there is a possibility of there being a significant effect on a European site, this will generate the need for an appropriate assessment under section 177V of the Planning Acts for the purposes of compliance with Article 6(3) of the Habitats Directive. This means that if the conclusions at the end of the screening exercise are that significant effects on any European sites, as a result of the proposed development, either alone or in combination with other plans and projects, are likely, uncertain or unknown, then an Appropriate Assessment must be carried out. This is in accordance with case law.

4.2 Potential Zone of Influence

This assessment is based on the source-pathway-receptor model, which dictates that, for an effect to occur, there must be a 'source' (such as a construction site); a 'receptor' (such as a designated site for nature conservation); and a 'pathway' between the two (such as a watercourse). A construction site or completed

development may also create a barrier to movement, for example, by preventing the migration of fauna along a river corridor, or by obstructing the migration of birds.

Identification of a potential effect 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 potential effect and the characteristics of the receptor. Although there may be a risk of an impact, it may not necessarily occur, and if it does occur, it may not be significant. In other words, the existence of a source, a pathway and a receptor does not necessarily mean that a significant effect is likely.

There are no set recommended distances for projects to consider European sites as being relevant for assessment. DoEHLG (2010a, pp. 31 – 32) states that:

"The approach to screening is likely to differ somewhat for plans and projects, depending on scale and on the likely effects, but the following should be included:

1. *Any Natura 2000 sites within or adjacent to the plan or project area*
2. *Any Natura 2000 sites within the likely zone of impact of the plan or project. A distance of 15km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et al., 2006). For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects*
3. *Natura 2000 sites that are more than 15km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the cases of sites with water dependent habitats or species, and a plan or project that could affect water quality or quantity, for example, it may be necessary to consider the full extent of the upstream and/or downstream catchment."*

The 2021 OPR guidelines, *Practice Note PN01: Appropriate Assessment Screening for Development Management*, state that the Zone of Influence *"should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km)"* (p. 8).

Therefore, considering the nature, scale and location of the permitted development, and in accordance with the source-pathway-receptor model, the potential Zone of Influence for the permitted development including the proposed amendments is:

- Any site to which there is a pathway from the subject site during either construction or operation as defined in the following sections. This assessment takes account of all sites within the *potential* Zone of Influence first, regardless of distance.

4.2.1 European Sites

No part of the subject site is under any designation for nature conservation and there are no European sites in the immediate vicinity. The nearest sites are as follows (see **Figure 4.1**):

- **Special Areas of Conservation (SAC)**
  - South Dublin Bay SAC (site code 000210), c.4.7km to the east
  - North Dublin Bay SAC (site code 000206), c.7.5km to the north east
  - Glenasmole Valley SAC (site code 001209), c.10.0km to the south west
  - Wicklow Mountains SAC (site code 002122), c.10.5km to the south

- Baldoyle Bay SAC (site code 000199), c.12.5km to the north east
- Rockabill to Dalkey Island SAC (site code 003000), c.13.0km to the east
- Howth Head SAC (site code 000202), c.13.1km to the north east
- Rye Water Valley/Carton SAC (site code 001398), c.14.0km to the west
- Knocksink Wood SAC (site code 000725), c.14.3km to the south
- Malahide Estuary SAC (site code 000205), c.15.2km to the north
- Ballyman Glen SAC (site code 000713), c.16.0km to the south east
- Ireland's Eye SAC (site code 002193), c.16.4km to the north east
- Rogerstown Estuary SAC (site codes 000208), c.19.3km to the north

- Special Protection Areas (SPA)

  - South Dublin Bay and River Tolka Estuary SPA (site code 004024), c.4.7km to the east
  - North Bull Island SPA (site code 004006), c.7.5km to the north east
  - North-West Irish Sea SPA (site code 004236), c. 9.3km to the north east
  - Wicklow Mountains SPA (site code 004040), c. 10.6km to the south
  - Baldoyle Bay SPA (site code 004016), c.12.7km to the north east
  - Dalkey Islands SPA (site code 004172), c.14.0km to the south east
  - Broadmeadow/Swords Estuary (Malahide Estuary) SPA (site code 004025), c.15.2km to the north
  - Howth Head Coast SPA (site code 004113), c.15.7km to the north east
  - Ireland's Eye SPA (site code 004117), c.16.2km to the north east
  - Rogerstown Estuary SPA (site codes 004015), c.19.6km to the north

Note that the above-listed distances are linear (i.e. 'as the crow flies').

The Conservation Objectives of these sites are to maintain or restore the favourable conservation condition of the QIs / SCIs in question. Where specific conservation objectives have been set out by the NPWS, 'favourable conservation condition' is defined in respect of specific attributes and targets for the habitat or species in question. For further information, refer to Appendix II.

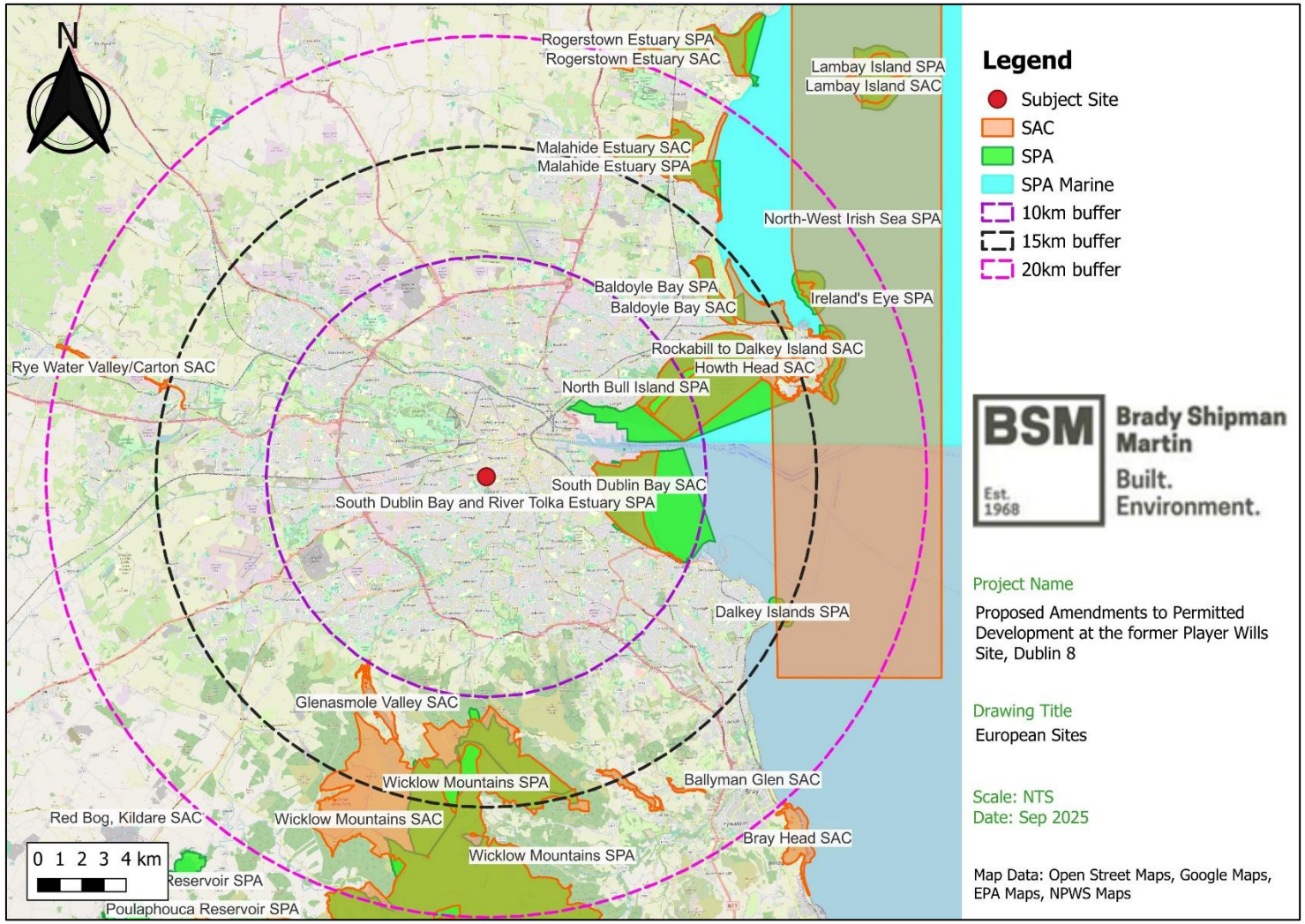


Figure 4.1 - European sites within 20km of the subject site. 10, 15 & 20 km radii are shown for scale and context.

4.2.2 Other designated areas (other than European sites)

Designated sites other than European sites (i.e. proposed Natural Heritage Areas (pNHAs) and designated Natural Heritage Areas (NHAs)) nearby have been included in this assessment in order to address their potential to act as supporting sites for European sites. There are no fully designated NHAs within the Potential Zone of Influence (the nearest is Skerries Islands NHA, some 29 km to the north-east). The pNHAs within the immediate vicinity include:

- Proposed Natural Heritage Areas (pNHA):
  - Grand Canal pNHA (site code: 002104), c. 100m to the south (although this section of the pNHA is in fact located on developed land in the White Heather Industrial Estate. The Grand Canal itself is c. 125m to the south)
  - Royal Canal pNHA (site code: 002103), c. 3.6km to the north
  - Liffey Valley pNHA (site code: 000128), c. 4.7km to the north west
  - North Dublin Bay pNHA (site code: 000206), c. 4.7km to the north east
  - South Dublin Bay pNHA (site code: 000210), c. 5.1km to the east
  - Dodder Valley pNHA (site code: 000991), c. 5.6km to the south west
  - Dolphins, Dublin Docks pNHA (site code: 000201), c. 6.4km to the north east
  - Booterstown Marsh pNHA (site code: 001205), c. 6.5km to the north east
  - Santry Demesne pNHA (site code: 000178), c. 7.8km to the north
  - Fitzsimon's Wood pNHA (site code: 001753), c. 8.0km to the south east

Note that above distances are as crow flies (i.e. linear distances). No impacts are expected on any pNHA in the zone of influence, including the Grand Canal pNHA – there is no pathway between the permitted development site and the canal.

Figure 4.2 illustrates all of the NHA and pNHA within the potential Zone of Influence (including those which overlap with European sites).

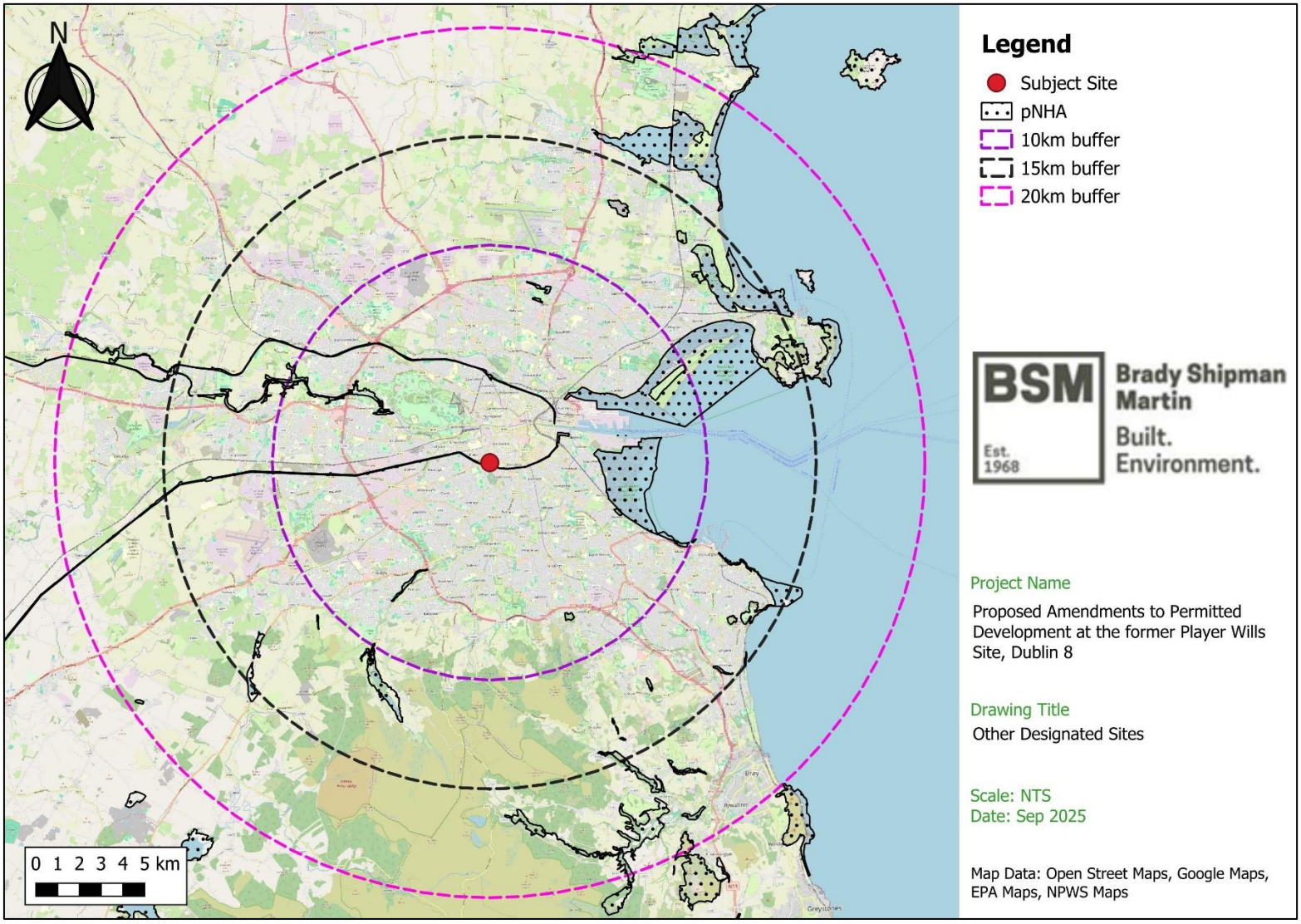


Figure 4.2 - pNHA sites within 20km of the subject site. 10,15 &20km radii are shown for scale and context.

4.2.3 Watercourses, and pathways to European sites

A review of the Environmental Protection Agency (EPA) web-tool, confirmed on the ground, indicates that there are no watercourses present on or in the immediate vicinity of the permitted development site, which is located within the River Liffey and Dublin Bay catchment (in the Dodder sub-catchment and the Poddle sub-basin).

The mapped course of the River Poddle is approximately 700m to the east of the subject site, however the Poddle is culverted for much of its length in the city centre and there is no connection between the permitted development site and this culverted watercourse.

The former Abbey Stream, which once ran through the permitted development site but which has long since been diverted to a storm water culvert in Donore Avenue, is similarly not hydrologically connected to the permitted development site (further historical background on the streams in the area can be found in the Civil Engineering Infrastructure Report for Planning, prepared by BMCE in December 2020 and submitted with the planning application for the permitted development). Other minor streams, all culverted in the past, are present in the surrounding streets, including the Hangman's Stream and the Tenter Water. There is however no pathway from the permitted development site to these or any other streams.

The Grand Canal (approximately 125m to the south at its closest point) is the only water feature of any significance in the vicinity of the subject site. Even this is entirely unconnected to the permitted development site – there is no pathway. Refer to Figure 4.3.

A second potential link to coastal European sites is via the emission point of the Ringsend Wastewater Treatment Plant (WwTP) which will receive foul water flows from the permitted development during its operation.

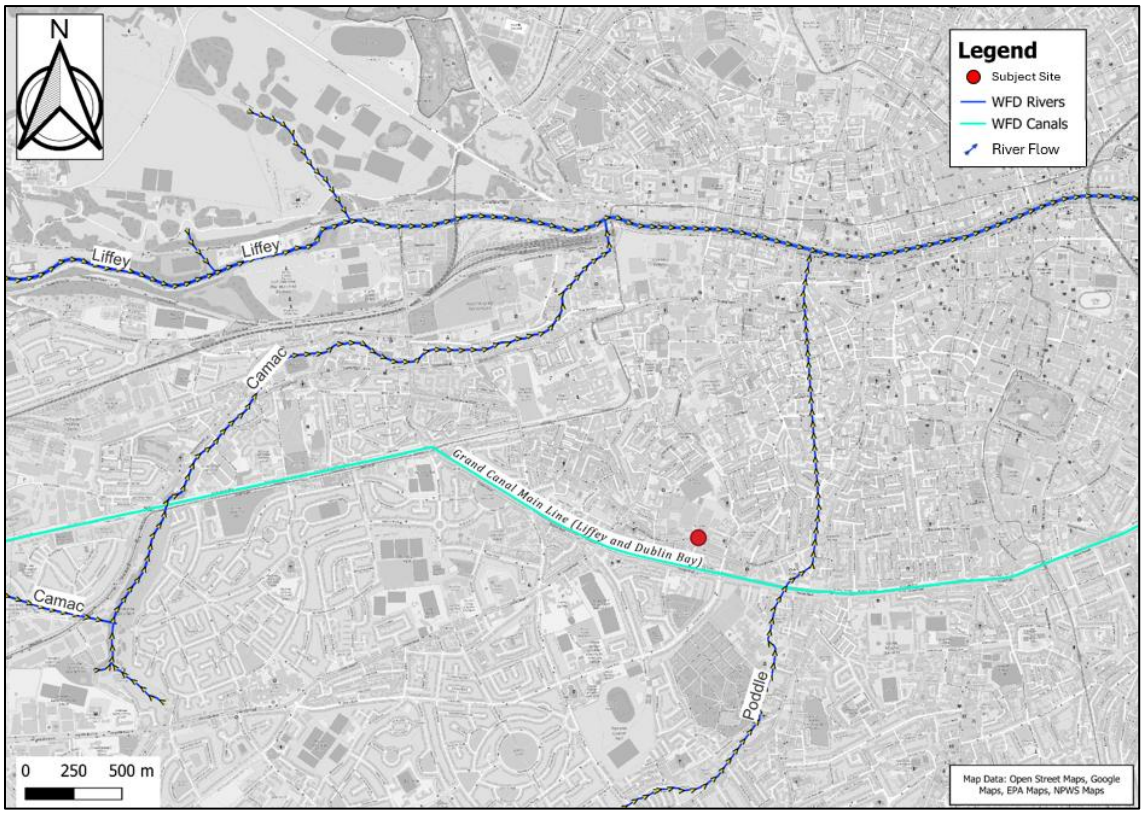


Figure 4.3 – EPA-mapped waterbodies in proximity of the permitted development site

5 Potential impacts from the proposed amendments to the permitted development including in-combination effects

5.1 European sites and habitats with links to European sites

The site of the permitted development is not under any wildlife or conservation designation. Furthermore, no rare, threatened or legally protected plant species, as listed in the *Irish Red Data Book 1 – Vascular Plants* (Curtis & McGough, 1988), the *Flora Protection Order, 2022* or the *EU Habitats Directive*, are known to occur within the site. None have ever been recorded by Brady Shipman Martin on the site (based on multiple site visits between 2019 and 2026).

No species listed on the Third Schedule of the Habitats Regulations, such as giant hogweed (*Heracleum mantegazzianum*), Japanese knotweed (*Reynoutria japonica*), Himalayan balsam (*Impatiens glandulifera*) or three-cornered leek (*Allium triquetrum*) have been recorded at the permitted development site. Several, including Japanese knotweed and giant hogweed, as well as rhododendron (*Rhododendron ponticum*), giant rhubarb (*Gunnera tinctoria*), Canadian waterweed (*Elodea canadensis*), Nuttall's waterweed (*E. nuttallii*) and Himalayan balsam, have all been recorded within 10km. Of interest is the presence of Japanese knotweed, which is known from various locations along the Grand Canal within 500m of the site. It is not however be present within the permitted development site.

No evidence of roosting bats has been recorded at the subject site, and the permitted development site itself has no significant value for roosting bats, nor for otters (these species are protected under Article 12 of the Habitats Directive).

The site of the permitted development, for which planning permission for minor amendments is being sought, contains no rare habitats or habitats of any significant ecological value (i.e. International, National or County Importance, or Local Importance). There are no Key Ecological Receptors at the permitted development site.

No habitats or species with links to European sites and no 'reservoir' type habitats (habitats which have the potential to support Qualifying Interest/Special Conservation Interest species in any European site) are present at the permitted development site. There is no habitat on the site suitable for use, even on a very occasional basis, by any overwintering birds, including the protected bird species listed as Special Conservation Interest (SCI) species in any SPA.

- This has been the case since the site was first visited, and an ecological survey was first carried out, by the author in 2019 and confirmed in the original planning application, now permitted.
- It remained the case during subsequent site visits by the author and other specialist ecologists in 2020, 2021 and 2024 as well as in 2025 (surveys as part of the first, permitted, amendment).
- It remains the case in October 2026.

At the time of writing of the AA Screening report and related documentation that accompanied the original planning application, now permitted, it was concluded that the site was of no ecological importance, as defined by the ecological resource valuations presented in the National Roads Authority/Transport Infrastructure Ireland *Guidelines for Assessment of Ecological Impacts of National Road Schemes*[4] (NRA/TII, 2009 (Rev. 2)).

[4] (NRA, 2009 (Rev. 2) https://www.tii.ie/technical-services/environment/planning/Guidelines-for-Assessment-of-Ecological-Impacts-of-National-Road-Schemes.pdf

- It remains the case in October 2026.

In summary, none of the habitats or features present on the site of the permitted development are Qualifying Interests/Special Conservation Interests in any European site within the Zone of Influence and none of these Qualifying Interests/Special Conservation Interests (see column 2 in Table 5.1 in Section 5.1.2) are present on the site. No evidence of any habitats or species with links to European sites was recorded during either the field surveys or desk study undertaken and no 'reservoir' type habitats (habitats which have the potential to support Qualifying Interest/Special Conservation Interest species in any European site) are present.

Since the planning application for the permitted (parent) development was made, one new European site has been designated – the North-West Irish Sea SPA (site code 004236) has been designated. This new SPA has been considered in this report, and the existence of this new marine SPA (designated for the presence of a range of marine birds) has no effect on the conclusions of either the original AA Screening report or this report.

5.1.1 Potential impacts during construction

The permitted development site has no significant ecological value, as noted in **Sections 3.1** and **5.1** above. There is no possibility of any of the QIs or SCIs of the European sites in the Potential Zone of Influence ever occurring at the permitted development site.

At any development site, clearance and construction activities pose a potential risk to water as **surface/ground water** arising at a site may contain contaminants. As set out in Section 4.2.3, no watercourses are present within or connected to the permitted development site. No watercourses or any other surface water features such as the Grand Canal are hydrologically connected to the permitted development site (refer to the Civil Engineering Infrastructure Report for Planning, prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted with the original planning application in 2020, as well as to the report prepared by BMCE in support of this amendment application.

The following extract from the BMCE report that accompanies this amendment application (submitted under separate cover) is noted:

> *The permitted block PW1 includes as a small basement for mechanical and electrical plant and equipment, extending to 190m^2. The proposed amendment will increase the basement to 231m^2. The proposed amendment to the basement footprint is shown in Figure 2* [of the BMCE report]. *The basement is located in the northeast corner of the block, in an area where a portion of the existing building will be demolished and replaced with a new structure, all as per the permitted development proposal. The 41m^2 increase in basement footprint is an extremely small change in the context of the full block floor area of approximately 3500m^2. The extended basement footprint will be 8.5m from the retained façade to the east and extend no closer to the retained structure to the south than the permitted basement. The extended basement depth will be no deeper than the permitted basement depth.*
>
> *There are no buried services in the vicinity of the proposed basement. The foundations required for the building will not be affected by the change in basement footprint. There are no existing or proposed trees in the vicinity of the proposed basement. As a result, it is concluded that the increase in basement footprint will have no negative impact on existing structures, buried services, existing or proposed trees or ground water flows.*

It was clear at the time of both the original planning application and the first permitted amendment that the development, as permitted, would result in no significant effects on European sites – either via surface or ground water, or via any other pathway. This was the conclusion of An Bord Pleanála in its Board Order for the parent permission and DCC in its Planner's Report for the first amendment application. The proposed amendment has no effect on construction-related impacts on the local groundwater environment.

Nevertheless, a theoretical, potential and weak surface water pathway, via the local surface water drainage network, exists between the permitted development site and the coastal European sites associated with Dublin Bay (i.e. South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Island SAC, North-West Irish Sea SPA, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA). There is also a potential groundwater pathway between the proposed development site and the European sites should indirect discharges (i.e. spillages to ground) occur or should any contamination on the site enter the ground water.

Despite the presence of these theoretical and indirect pathways, the risk of contamination of any watercourses or groundwater is extremely low, and even in the event of a pollution incident significant enough to impact upon surface water quality on the proposed development site this would not be perceptible in any European sites, for the following reasons:

- The distance to the European sites –the designated sites of Dublin Bay are almost 5km from the permitted development site (straight-line distance to the east) and there is no direct pathway between the subject site and any watercourses, or to any European sites.
- Any pollution from the construction site would be minimal in quantity and if it entered any watercourse or drain it would be so diluted as to be undetectable by the time the water enters the sea.
- The fact that a significant level of dilution and mixing of surface and sea water would occur in any event. Upon reaching the sea any pollutants would be even further diluted and dissipated by the receiving waters.
- These conclusions relate to the entirety of the permitted Player Wills development, and take full account of the proposed amendments.

As was the case with the permitted development there is no possibility of any other potential direct, indirect or secondary impacts on any European site during the construction phase of the proposed amendments. For example, there will be no land-take from any European site and there will be no resource requirements such as water abstraction. Similarly, there will be no emissions to air from construction vehicles that could remotely impact any European site. Dust, noise and vibration arising during construction will similarly be entirely remote from any European site.

There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the construction of the permitted development including the proposed amendments, no predicted impact on ex-situ species and no interference with the key relationships that define the structure or function of any European site

Construction-related impacts as a result of the permitted development including as a result of the amendments to the permitted development, via water or any other pathway, on European sites or otherwise, can therefore be excluded.

5.1.2 Potential impacts during operation

Currently, the permitted development site is virtually entirely hardstanding. Rainfall events are un-attenuated at present. Once operational, **surface water** flows from the permitted development site will be restricted in accordance with the requirements of the *Greater Dublin Strategic Drainage Study* (GDSDS). The

GDSDS addresses the issue of sustainability by requiring designs to comply with a set of drainage criteria which aim to replicate the run-off characteristics of the greenfield site. The criteria provide a consistent approach to addressing the increase in both rate and volume of run-off. The calculations set out in the Engineering Infrastructure Report prepared by BMCE and submitted with the planning application for the permitted development incorporate a 20% increase in storage volume to allow for climate change.

A sustainable urban drainage system (SuDS) approach to storm water management will be implemented throughout the overall site. SuDS are a requirement of Dublin City Council under the GDSDS and the *Regional Code of Practice for Drainage Works*. Additionally, these systems are recommended under the 2009 guidelines published by the OPW, *The Planning System and Flood Risk Assessment – Guidelines for Planning Authorities.*

The following extract from the BMCE report that accompanies this amendment application (submitted under separate cover) is noted:

> *The overall Player Wills SHD stormwater management strategy included:*
>
> - *Extensive Green roofs to each block roof surface.*
> - *Intensive Green roof to the block PW2 podium over basement.*
> - *Individual stormwater attenuation to each block prior to discharge to the public road.*
> - *SuDS tree pits collecting road and footpath runoff.*
>
> *The amendment application will maintain each of these SUDS proposals in full. There is no proposed change to the drained area, extent of green roof or permeable paved surface in PW1, with no resultant change in the attenuation volume or discharge rate. There is no proposed change to the drained area, extent of green roof or permeable paved surface in PW2, with no resultant change in the attenuation volume or discharge rate. As shown in Figure 1* [of the BMCE report]*, the proposed layout change in block PW5 result in a negligible change in the block footprint. The green roof provision, attenuation storage volume and discharge rate will remain as per the permitted development.*

Operation-related impacts as a result of the permitted development including as a result of the amendments to the permitted development, via storm water, on European sites or otherwise, can therefore be excluded.

A site-specific **flood risk assessment** was carried out by BMCE (it is included in the Engineering Infrastructure Report originally submitted), in accordance with the OPW publication *The Planning System and Flood Risk Assessment – Guidelines for Planning Authorities*. The report concluded that there is no risk of flooding affecting the site from fluvial sources, so it is possible to develop the site within Flood Zone C.

The following extract from the BMCE report that accompanies this amendment application (submitted under separate cover) is noted:

> *The site-specific flood risk assessment for the permitted development established that the site is in Flood Zone C, and that when assessed in accordance with the OPW Flood Risk Management Guidelines, the development was deemed 'Appropriate' without the requirement for a Justification Test or flood mitigation measures. The proposed amendment application does not include any changes to the road, footpath, ground floor or basement entrance levels. As a result, permitted development flood risk assessment remains valid for the proposed amendment, and the development remains 'Appropriate'.*

There will be no operational impacts related to surface water management or flooding, on European sites or otherwise, as a result of the proposed development.

Operation-related impacts as a result of the permitted development including as a result of the amendments to the permitted development, via flooding, on European sites or otherwise, can therefore be excluded.

The new **foul drainage** system for the permitted development will connect to the existing 300mm combined sewer in Donore Avenue at the north-east corner of the Player Wills site. The Ringsend WwTP, to which foul water from the permitted development will be discharged, operates under licence from the EPA (Licence no. D0034-02) and received planning permission (ABP reg. ref.: 301798) in 2019 for upgrade works, which are now complete (in February 2026 according to Uisce Éireann). The upgrade works will result in treatment of sewage to a higher quality than the past, thereby ensuring effluent discharge to Dublin Bay will comply with the Urban Wastewater Treatment Directive in the future.

The following extract from the BMCE report that accompanies this amendment application (submitted under separate cover) is noted:

> *Both a Confirmation of Feasibility and a Statement of Design Acceptance were obtained from Uisce Éireann for the permitted development. Subsequently, a connection agreement has been executed for the two large blocks, PW1 and PW2, and that agreement includes provision for the water demand and wastewater flows to service the two substantially smaller blocks, PW4 and PW5. As outlined in the development description, the proposed amendments to the permitted development will result in no change in water or wastewater connection sizes, location, total water demand or total wastewater flow from the permitted development, or as included in the executed connection agreement.*

Operation-related impacts as a result of the permitted development including as a result of the amendments to the permitted development, via foul water, on European sites or otherwise, can therefore be excluded.

There is no possibility of any other potential direct, indirect or secondary impacts on any European site once the completed development (including the proposed amendments) is operational. There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the operation of the development, and no interference with the key relationships that define the structure or function of any European site.

Operation-related impacts as a result of the permitted development including as a result of the amendments to the permitted development, on European sites or otherwise, can therefore be excluded.

The potential for impacts to occur on the pNHAs listed in Section 4.2.2 has been given due consideration, in respect of their potential to support the Conservation Objectives of European sites. There are no potential impact pathways linking the site of the permitted development with these pNHAs. Potential indirect impacts on European sites resulting from impacts on other designated areas are, therefore, discounted from further consideration.

A detailed discussion of the potential impacts of the amendments to the permitted development on individual European sites within the potential Zone of Influence is presented in **Table 5.1**, below.

Table 5.1 Potential impacts on European sites in the potential Zone of Influence (in this table the term *proposed development* refers to the *proposed amendments to the permitted development*)

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Special Area of Conservation (SAC)			
South Dublin Bay SAC (site code 000210), c.4.7km to the east (straight line distance)	▪ 1140 Mudflats and sandflats not covered by seawater at low tide ▪ 1210 Annual vegetation of drift lines ▪ 1310 Salicornia and other annuals colonising mud and sand ▪ 2110 Embryonic shifting dunes According to this SAC's site Conservation Objectives document (Version 2, dated 24 April 2026), for the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat for which the SAC has been selected.	**This site is within the Zone of Influence of the proposed development** Nevertheless, no significant effects on water quality, and therefore on the site's QIs, are predicted. Surface/ground water arising during the completion and operation of the permitted development at the Player Wills site, including as a result of the proposed amendments could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea. There will be no likely significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5. Even in the unlikely event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality at the proposed development site, this would not be perceptible in South Dublin Bay SAC. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the construction of the proposed development. No operational impacts on this European site will occur as a result of the proposed development.	No
North Dublin Bay SAC (site code 000206), c.7.5km to the north east	▪ 1140 Mudflats and sandflats not covered by seawater at low tide ▪ 1210 Annual vegetation of drift lines ▪ 1310 Salicornia and other annuals colonising mud and sand	**This site is within the Zone of Influence of the proposed development** Nevertheless, no significant effects on water quality, and therefore on the site's QIs, are predicted.	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) ▪ 1395 Petalwort (*Petalophyllum ralfsii)* ▪ 1410 Mediterranean salt meadows (Juncetalia maritimi) ▪ 2110 Embryonic shifting dunes ▪ 2120 Shifting dunes along the shoreline with Ammophila arenaria (white dunes) ▪ 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* ▪ 2190 Humid dune slacks According to this SAC's site Conservation Objectives document (Version 1, dated 06 November 2013), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	Surface/ground water arising during the completion and operation of the permitted development at the Player Wills site, including as a result of the proposed amendments could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea. There will be no likely significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5. Even in the unlikely event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality at the proposed development site, this would not be perceptible in North Dublin Bay SAC. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the construction of the proposed development. No operational impacts on this European site will occur as a result of the proposed development.	
Glenasmole Valley SAC (site code 001209), c.10.0km to the south west	▪ [6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) ▪ [6410] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) ▪ [7220] Petrifying springs with tufa formation (Cratoneurion)* According to this SAC's site Conservation Objectives document (Version 1, dated 10 December 2021), for each of the listed QIs, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is approximately 10km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Wicklow Mountains SAC (site code 002122), c.10.5km to the south	▪ [1355] Otter (*Lutra lutra*) ▪ [3110] Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) ▪ [3130] Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea ▪ [3160] Natural dystrophic lakes and ponds ▪ [4010] Northern Atlantic wet heaths with *Erica tetralix* ▪ [4030] European dry heaths ▪ [4060] Alpine and Boreal heaths ▪ [6130] Calaminarian grasslands of the Violetalia calaminariae ▪ [6230] Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) ▪ [7130] Blanket bogs (* if active bog) ▪ [8110] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) ▪ [8210] Calcareous rocky slopes with chasmophytic vegetation ▪ [8220] Siliceous rocky slopes with chasmophytic vegetation ▪ [91A0] Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles According to this SAC's site Conservation Objectives document (Version 1, dated 31 July 2017), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is almost 11km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No
Baldoyle Bay SAC (site code 000199), c.12.5km to the north east	▪ 1140 Mudflats and sandflats not covered by seawater at low tide ▪ 1310 *Salicornia* and other annuals colonising mud and sand ▪ 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae)*	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is almost 13km distant and is unconnected via the surface water pathway or any other pathway.	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ 1410 Mediterranean salt meadows (*Juncetalia maritimi*) According to this SAC's site Conservation Objectives document (Version 1, dated 19 November 2012), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	
Rockabill to Dalkey Island SAC (site code 003000), c.13.0km to the east;	▪ 1170 Reefs ▪ 1351 Harbour Porpoise *(Phocoena phocoena)* According to this SAC's site Conservation Objectives document (Version 1, dated 07 May 2013), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	**This site is within the Zone of Influence of the proposed development** Nevertheless, no significant effects on water quality, and therefore on the site's QIs, are predicted. Surface/ground water arising during the completion and operation of the permitted development at the Player Wills site, including as a result of the proposed amendments could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea. There will be no likely significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5. Even in the unlikely event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality at the proposed development site, this would not be perceptible in Rockabill to Dalkey Island SAC. There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the construction of the proposed development. No operational impacts on this European site will occur as a result of the proposed development.	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Howth Head SAC (site code 000202), c.13.1km to the north east	▪ 1230 Vegetated sea cliffs of the Atlantic and Baltic coasts ▪ 4030 European dry heaths According to this SAC's site Conservation Objectives document (Version 1, dated 06 December 2016), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitats for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is over 13km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No
Rye Water Valley/Carton SAC (site code 001398), c.14.0km to the west	▪ 7220 Petrifying springs with tufa formation (Cratoneurion)* ▪ 1016 Desmoulin's whorl snail (*Vertigo moulinsiana*) ▪ 1014 Narrow-mouthed whorl snail (*Vertigo angustior*) According to this SAC's site Conservation Objectives document (Version 1, dated 22 December 2021), for each of the listed QIs, the Conservation Objectives are to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is approximately 14km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No
Knocksink Wood SAC (site code 000725), c.14.3km to the south	▪ 7220 Petrifying springs with tufa formation (Cratoneurion)* ▪ 91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles ▪ 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae)* According to this SAC's site Conservation Objectives document (Version 1, dated 13 December 2021), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is over 14km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No
Malahide Estuary SAC (site code 000205), c.	▪ 1140 Mudflats and sandflats not covered by seawater at low tide	**This site is not within the Zone of Influence of the proposed development.**	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
15.2km to the north	■ 1310 Salicornia and other annuals colonising mud and sand ■ 1320 Spartina swards (Spartinion maritimae) ■ 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) ■ 1410 Mediterranean salt meadows (Juncetalia maritimi) ■ 2120 Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) ■ 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* **indicates a priority habitat under the Habitats Directive* According to this SAC's site Conservation Objectives document (Version 1, dated 27 May 2013), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is over 15km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	
Ballyman Glen SAC (site code 000713), c. 16.0km to the south east	■ 7220 Petrifying springs with tufa formation (Cratoneurion)* ■ 7230 Alkaline fens According to this SAC's site Conservation Objectives document (Version 1, dated 17 July 2019), for each of the listed QIs, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is approximately 16km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No
Ireland's Eye SAC (site code 002193), c. 16.4km to the north east	■ 1220 Perennial vegetation of stony banks ■ 1230 Vegetated sea cliffs of the Atlantic and Baltic coasts According to this SAC's site Conservation Objectives document (Version 1, dated 27 January 2017), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) for which the SAC has been	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is over 16km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	selected.	disturbance to the QIs of this SAC.	
Rogerstown Estuary SAC (site codes 000208), c. 19.3km to the north	▪ 1130 Estuaries ▪ 1140 Mudflats and sandflats not covered by seawater at low tide ▪ 1310 Salicornia and other annuals colonising mud and sand ▪ 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) ▪ 1410 Mediterranean salt meadows (Juncetalia maritimi) ▪ 2120 Shifting dunes along the shoreline with Ammophila arenaria (white dunes) ▪ 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* *indicates a priority habitat under the Habitats Directive According to this SAC's site Conservation Objectives document (Version 1, dated 14 August 2013), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SAC. It is almost 20km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC.	No
South Dublin Bay and River Tolka Estuary SPA (site code 004024), c.4.7km to the east (straight line distance)	▪ A144 Sanderling (*Calidris alba*) ▪ A157 Bar-tailed Godwit (*Limosa lapponica)* ▪ A149 Dunlin (*Calidris alpina*) ▪ A162 Redshank (*Tringa totanus*) ▪ A179 Black-headed Gull (*Chroicocephalus ridibundus*) ▪ A143 Knot (*Calidris canutus*) ▪ A192 Roseate Tern (*Sterna dougallii*) ▪ A046 Light-bellied Brent Goose (*Branta bernicla hrota*) ▪ A141 Grey Plover (*Pluvialis squatarola)* ▪ A130 Oystercatcher (*Haematopus ostralegus)* ▪ A194 Arctic Tern (*Sterna paradisaea*) ▪ A193 Common Tern (*Sterna hirundo*)	**This site is within the Zone of Influence of the proposed development** Nevertheless, no significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the completion and operation of the permitted development at the Player Wills site, including as a result of the proposed amendments could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea. There will be no likely significant effects on the conservation	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ A137 Ringed Plover (*Charadrius hiaticula)* ▪ A999 Wetlands According to this SPA's site Conservation Objectives document (Version 1, dated 9 March 2015), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5. Even in the unlikely event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality at the proposed development site, this would not be perceptible in South Dublin Bay and River Tolka Estuary SPA. There will be no loss of habitat or species, fragmentation or disturbance to the special conservation interests of this site as a result of the construction of the proposed development. No operational impacts on this European site will occur as a result of the proposed development.	
North Bull Island SPA (site code 004006), c.7.5km to the north east	▪ A046 Light-bellied Brent Goose (*Branta bernicla hrota)* ▪ A048 Shelduck (*Tadorna tadorna*) ▪ A052 Teal (*Anas crecca*) ▪ A054 Pintail (*Anas acuta*) ▪ A056 Shoveler (*Anas clypeata*) ▪ A130 Oystercatcher (*Haematopus ostralegus)* ▪ A140 Golden Plover (*Pluvialis apricaria*) ▪ A141 Grey Plover (*Pluvialis squatarola*) ▪ A143 Knot (*Calidris canutus*) ▪ A144 Sanderling (*Calidris alba*) ▪ A149 Dunlin (*Calidris alpina*) ▪ A156 Black-tailed Godwit (*Limosa limosa*) ▪ A157 Bar-tailed Godwit (*Limosa lapponica)* ▪ A160 Curlew (*Numenius arquata)* ▪ A162 Redshank (*Tringa totanus)* ▪ A169 Turnstone (*Arenaria interpres)* ▪ A179 Black-headed Gull (*Chroicocephalus ridibundus)* ▪ [A999] Wetland	**This site is within the Zone of Influence of the proposed development** Nevertheless, no significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the completion and operation of the permitted development at the Player Wills site, including as a result of the proposed amendments could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea. There will be no likely significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5. Even in the unlikely event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality at the proposed development site, this would not be perceptible in North Bull Island SPA.	**No**

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ According to this SPA's site Conservation Objectives document (Version 1, dated 9 March 2015), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	There will be no loss of habitat or species, fragmentation or disturbance to the special conservation interests of this site as a result of the construction of the proposed development. No operational impacts on this European site will occur as a result of the proposed development.	
North-West Irish Sea SPA (site code 004236), c. 9.3km to the north east	▪ A065 Common Scoter (*Melanitta nigra*) ▪ A001 Red-throated Diver (*Gavia stellata*) ▪ A003 Great Northern Diver (Gavia imm*er*) ▪ A009 Fulmar (*Fulmarus glacialis*) ▪ A013 Manx Shearwater (*Puffinus puffinus*) ▪ A018 Shag (*Phalacrocorax aristotelis*) ▪ A017 Cormorant (*Phalacrocorax carbo*) ▪ A177 Little Gull (*Larus minutus*) ▪ A188 Kittiwake (*Rissa tridactyla*) ▪ A179 Black-headed Gull (*Chroicocephalus ridibundus*) ▪ A182 Common Gull (Larus c*anus*) ▪ A183 Lesser Black-backed Gull (*Larus fuscus)* ▪ A184 Herring Gull (*Larus argentatus*) ▪ A187 Great Black-backed Gull (*Larus marinus*) ▪ A195 Little Tern (*Sterna albifrons*) ▪ A192 Roseate Tern (*Sterna dougallii*) ▪ A193 Common Tern (*Sterna hirundo*) ▪ A194 Arctic Tern (*Sterna paradisaea*) ▪ A204 Puffin (*Fratercula arctica*) ▪ A200 Razorbill (*Alca torda*) ▪ A199 Guillemot (*Uria aalge*) According to this SPA's site Conservation Objectives document (Version 1 - dated 19 September 2023), for each of the listed SCIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the species for which the SPA has been selected.	**This site is within the Zone of Influence of the proposed development** Nevertheless, no significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the completion and operation of the permitted development at the Player Wills site, including as a result of the proposed amendments could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea. There will be no likely significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5. Even in the unlikely event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality at the proposed development site, this would not be perceptible in North-West Irish Sea SPA. There will be no loss of habitat or species, fragmentation or disturbance to the special conservation interests of this site as a result of the construction of the proposed development. No operational impacts on this European site will occur as a result of the proposed development.	No

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Wicklow Mountains SPA (site code 004040), c.10.6km to the south	▪ [A098] Merlin (*Falco columbarius*) ▪ [A103] Peregrine (*Falco peregrinus*) According to this SPA's Conservation Objectives document (Version 1.0, dated 16 July 2024), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SPA. It is almost 11km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	**No**
Baldoyle Bay SPA (site code 004016), c.12.7km to the north east	▪ [A046] Brent Goose (*Branta bernicla hrota)* ▪ [A048] Shelduck (*Tadorna tadorna*) ▪ [A137] Ringed Plover (*Charadrius hiaticula)* ▪ [A140] Golden Plover (*Pluvialis apricaria)* ▪ [A141] Grey Plover (*Pluvialis squatarola)* ▪ [A157] Bar-tailed Godwit (*Limosa lapponica)* ▪ [A999] Wetlands According to this SPA's site Conservation Objectives document (Version 1 - dated 27 February 2013), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SPA. It is almost 13km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	**No**
Dalkey Islands SPA (site code 004172), c.14.0km to the south east	▪ [A192] Roseate Tern (*Sterna dougallii*) ▪ [A193] Common Tern (*Sterna hirundo*) ▪ [A194] Arctic Tern (*Sterna paradisaea*) According to this SPA's Site Conservation Objectives document (Version 1.0, dated 29 October 2024), for the listed SCIs, the Conservation Objective is to restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SPA. It is approximately 14km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	**No**
Malahide Estuary SPA	▪ [A005] Great Crested Grebe (*Podiceps cristatus)*	**This site is not within the Zone of Influence of the proposed**	**No**

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
(site code 004025), c. 15.2km to the north	▪ [A046] Brent Goose (*Branta bernicla hrota)* ▪ [A048] Shelduck (*Tadorna tadorna)* ▪ [A054] Pintail *(Anas acuta)* ▪ [A067] Goldeneye (*Bucephala clangula)* ▪ [A069] Red-breasted *Merganser (Mergus serrator)* ▪ [A130] Oystercatcher (*Haematopus ostralegus)* ▪ [A140] Golden Plover (*Pluvialis apricaria)* ▪ [A141] Grey Plover (*Pluvialis squatarola)* ▪ [A143] Knot (*Calidris canutus)* ▪ [A149] Dunlin (*Calidris alpina alpina)* ▪ [A156] Black-tailed Godwit (*Limosa limosa)* ▪ [A157] Bar-tailed Godwit (*Limosa lapponica)* ▪ [A162] Redshank (*Tringa totanus)* ▪ [A999] Wetlands According to this SPA's site Conservation Objectives document (Version 1, dated 16 August 2013), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	**development.** There is no direct hydrological link or any other pathway between the proposed development and this SPA. It is over 15km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	
Howth Head Coast SPA (site code 004113), c. 15.7km to the north east	▪ [A188] Kittiwake (*Rissa tridactyla*) According to this SPA's Site Conservation Objectives document (Version 1.0, dated 29 October 2024), for the listed SCI, the Conservation Objective is to restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SPA. It is almost 16km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	**No**
Ireland's Eye SPA (site code 004117), c. 16.2km to the north east	▪ [A017] Cormorant (*Phalacrocorax carbo)* ▪ [A184] Herring Gull (*Larus argentatus*) ▪ [A188] Kittiwake (*Rissa tridactyla*) ▪ [A199] Guillemot (*Uria aalge*)	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the	**No**

Site	Reasons for designation (information correct as of October 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ [A200] Razorbill (*Alca torda*) According to this SPA's Site Conservation Objectives document (Version 1.0, dated 12 November 2024), for each of the listed SCIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	proposed development and this SPA. It is over 16km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	
Rogerstown Estuary SPA (site code 004015), c. 19.6km to the north	▪ [A043] Greylag Goose (*Anser anser*) ▪ [A046] Brent Goose (*Branta bernicla hrota*) ▪ [A048] Shelduck (*Tadorna tadorna*) ▪ [A056] Shoveler (*Anas clypeata*) ▪ [A130] Oystercatcher (*Haematopus ostralegus)* ▪ [A137] Ringed Plover (*Charadrius hiaticula)* ▪ [A141] Grey Plover (*Pluvialis squatarola)* ▪ [A143] Knot (*Calidris canutus*) ▪ [A149] Dunlin (*Calidris alpina alpina*) ▪ [A156] Black-tailed Godwit (*Limosa limosa)* ▪ [A162] Redshank (*Tringa totanus*) ▪ [A999] Wetlands According to this SPA's site Conservation Objectives document (Version 1 - dated 20 May 2013), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	**This site is not within the Zone of Influence of the proposed development.** There is no direct hydrological link or any other pathway between the proposed development and this SPA. It is almost 20km distant and is unconnected via the surface water pathway or any other pathway. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA.	No

5.2 Summary of potential impacts of the proposed amendments to the permitted development

The proposed amendments to the permitted development will not result in land-take from any European site and there will be no resource requirements such as water abstraction. Similarly, there will be no emissions to air from construction vehicles that could remotely impact any European site. Dust, noise and vibration arising during construction will similarly be entirely remote from any European site.

There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the construction or operation of the amendments to the permitted development, no predicted impact on *ex-situ* species and no interference with the key relationships that define the structure or function of any European site.

There will also be no significant effects on any European sites as a result of:

- Habitat loss and/or fragmentation
- Land-take
- Resource requirements such as water abstraction
- Impacts to habitat structure
- Mortality to species (such as roadkill)
- Noise pollution / vibration impacts
- Light pollution
- Emissions to air (including dust)
- Emissions to water

Additionally, for the reasons outlined in this report for the European sites, no impacts on any other designated sites including proposed Natural Heritage Areas, will occur.

6 Mitigation specific to European sites

This screening assessment is consistent with the judgment of the European Court in Case C-323/17, People Over Wind & Sweetman v Coillte (Judgment of the Court (Seventh Chamber) of 12 April 2018) and the recent case-law of the High Court, including Heather Hill Management Company CLG v An Bord Pleanála [2019] IEHC 450 and Sweetman v An Bord Pleanála [2020] IEHC 39.

It is also consistent with the judgment in Eco Advocacy CLG v An Bord Pleanála [2021] IEHC 265. In that case, Humphreys J confirmed the core legal principle, being that regard should not be had to mitigation measures at AA screening stage. Humphreys J decided in that case that clarification was required from the CJEU on the matter (as it related to the consideration of SUDs and whether these represented mitigation measures).

The CJEU, in its ruling on this case dated 15 June 2023 clarified issues defining mitigation in the context of European sites[5]. It confirmed that Article 6(3) of Directive 92/43 *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*

[4]https://curia.europa.eu/juris/document/document.jsf?text=&docid=274644&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=21723482

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.

In relation to European sites, there will be no impacts capable of giving rise to any likely significant effects as a result of the proposed amendments to the permitted development. SuDS measures have been incorporated into the design of the permitted development as standard features. SuDS features are highly effective and are required to be included in developments where appropriate (SuDS are a requirement of Dublin City Council under the GDSDS and the Greater Dublin Regional Code of Practice for Drainage Works). These standard measures are considered best practice in construction and, therefore reasonable scientific doubt concerning their effectiveness can be ruled out.

As set out in this report, it is certain that likely significant effects on European sites as a result of both the construction and operation of the permitted development, including the proposed amendments, can be excluded. Even if no SuDS measures were to be incorporated into the design there could be no impacts on European sites.

No mitigation is necessary or proposed for the protection of European sites.

7 In-combination effects

It is a requirement of Section 177U of the Planning Acts that when considering whether a plan or project will have a significant effect on a European site the assessment must take into account in-combination effects with other plans and projects. The assessment should consider plans and projects that are completed, approved but uncompleted, or proposed (but not yet approved).[6] If there are identified effects arising from the plan or project even if they are perceived as minor and not likely to have a significant effect on the integrity of a European site alone, then these effects must be considered 'in-combination' with the effects arising from other plans and projects.

The following sources were consulted to identify relevant other plans or projects:

- Dublin City Development Plan 2022-2028 (the current Plan)
- Dublin City Development Plan 2016 – 2022 (the Plan under which the parent application was permitted)
- The National Planning Application database (www.myplan.ie - accessed October 2026)
- An Coimisiún Pleanála database (www.pleanala.ie – accessed October 2026)
- EIA Portal (www.housinggovie.maps.arcgis.com – accessed October 2026)

Permitted and proposed projects in the immediate vicinity of the site were considered in terms of the potential for in-combination effects. There are no developments planned, permitted or under construction that will give rise to any significant effects on European sites in combination with the proposed development.

This includes the permitted LDA Donore Project (under construction) and the permitted Bailey Gibson development (under construction).

[5] *Assessment of Plans and Projects in relation to Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, September 2021)*

Considering the nature and scale of the proposed development, comprising minor amendments to permitted development in an area undergoing significant construction activity, the localised and insignificant nature of the environmental effects predicted to occur as a result of the proposed development, and the nature of existing, permitted and proposed development in its environs, it is considered that significant in combination effects on European sites are not likely to occur.

A number of other plans were considered when assessing in-combination effects, but it was determined that there would be no in-combination effects with these:

- First Revision to the National Planning Framework (April 2025)
- The Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2019 – 2031 (The Eastern and Midland Regional Assembly)
- The Greater Dublin Strategic Drainage Study
- Greater Dublin Area Transport Strategy 2022-2042
- Climate Action Plan 2025 (CAP 25)
- Dublin City Council, Climate Neutral Dublin 2030, Local Authority Climate Action Plan 2024 – 2029;
- National Biodiversity Action Plan 2023 – 2030

None of these plans grant development consent so do not in themselves generate a specific adverse effect that can be assessed along with the proposed development for the purposes of the in-combination assessment.

It is considered that significant in-combination effects on European sites are not likely to occur as a result of the proposed development in combination with other plans or projects.

8 Screening conclusion

In view of best scientific knowledge this report concludes that the proposed amendments to the development permitted by An Bord Pleanála (ABP Reg. Ref.: ABP-308917-20) and Dublin City Council (3406/25) at the Player Wills Site, individually or in combination with another plan or project, will have no likely significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dublin City Council) to carry out an AA Screening and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives.

9 References

- Chartered Institute of Ecology and Environmental Management (CIEEM) (2024). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (Version 1.3).
- DoEHLG (2010a). Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities.
- DoEHLG (2010b). Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.
- DoHLGH (2026). EIA Portal.
- European Commission (2021). Assessment of plans and projects in relation to Natura 2000 sites- Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
- European Commission (2018). Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.
- European Commission Environment Directorate-General (2021). Guidance document on the strict protection of animal species of Community Interest under the Habitats Directive.
- Dublin City Council Development Plan 2022-2028.
- NBDC (2026). Biodiversity Maps.
- NPWS (2021). Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority.
- NPWS (2026). Boundary data – Special Area of Conservation (SAC). [Update date 03/03/2026].
- NPWS (2026). Boundary data – Special Protection Area (SPA). [Update date03/03/2026].
- NPWS (2015). Boundary data – proposed Natural Heritage Area (pNHA). [Update date 01/11/2015].
- NPWS (2019). Boundary data –Natural Heritage Area (pNHA). [Update date 28/06/2019].
- NRA (2009). Guidelines for Assessment of Ecological Impacts of National Road Schemes.
- OPR (2021). Practice Note PN01 Appropriate Assessment Screening for Development Management.
- OPW (2009). The Planning System and Flood Risk Management – Guidelines for Planning Authorities.

Appendix I: Background

The European[7] network is a Europe-wide network of ecologically important sites (SPAs and SACs – also known as 'European Sites' or 'Natura 2000 sites') that have been designated for protection under either the EU Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) or the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna).

The main aim of the Habitats Directive is *"to contribute towards ensuring bio-diversity through the conservation of natural habitats and of wild fauna and flora in the European territory of the Member States to which the Treaty applies"*. Any actions taken must be designed to *"maintain or restore, at a favourable conservation status, natural habitats and species of wild fauna and flora of Community interest"*. Under Article 6 of the Habitats Directive, an assessment is required where a plan or project is not directly connected with or necessary to the management of a European Site but may give rise to significant effects upon a European site.

In addition, it is a matter of law that candidate SACs (cSACs), candidate SPAs (cSPAs) and Sites of Community Importance (SCI) are considered in this process and treated the same as SACs and SPAs.

Article 6 (paragraphs (3) and (4)) of the Habitats Directive states that:

> (3) Any plan or project not directly connected with or necessary to the management of the site but likely to have 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.
>
> (4) 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 a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of 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.

The requirements of the Habitats Directive are transposed into Irish law by means of the *European Union (Birds and Natural Habitats) Regulations 2011-2021* (hereafter referred to as the *Birds and Habitats Regulations*)[8] and by the *Planning and Development Act 2000*, as amended.

In Ireland, the statutory agency responsible for the designated areas is NPWS.

[7] The EU Habitats Directive, Article 3.1, states "*A Coherent European ecological network of Special Areas of Conservation and Special Protection Areas pursuant to Directive 79/409/EEC shall be set up under the title Natura 2000*"

[8] SI No. 477 of 2011 and subsequent amendments

Stages in the assessment

European Commission guidance (2021)[9] sets out the principles on how to undertake decision making in applying the Habitats Directive. The requirements of the Habitats Directive comprise three distinct stages:

Stage one: screening. The first part of the procedure consists of a pre-assessment stage ('screening') to ascertain whether the plan or project is directly connected with, or necessary to, the management of a Natura 2000 site, and, if this is not the case, then whether it is likely to have a significant effect on the site (either alone or in combination with other plans or projects) in view of the site's conservation objectives. Stage one is governed by the first part of the first sentence of Article 6(3).

Stage two: the appropriate assessment. If likely significant effects cannot be excluded, the next stage of the procedure involves assessing the impact of the plan or project (either alone or in combination with other plans or projects) against the site's conservation objectives, and ascertaining whether it will affect the integrity of the Natura 2000 site, taking into account any mitigation measures. It will be for the competent authorities to decide whether or not to approve the plan or project in light of the findings of the appropriate assessment. Stage two is governed by the second part of the first sentence and the second sentence of Article 6(3).

Stage three: derogation from Article 6(3) under certain conditions. The third stage of the procedure governed by Article 6(4). It only comes into play if, despite a negative assessment, the developer considers that the plan or project should still be carried out for imperative reasons of overriding public interest. This is only possible if there are no alternative solutions, the imperative reasons of overriding public interest are duly justified, and if suitable compensatory measures are adopted to ensure that the overall coherence of Natura 2000 is protected.

[9] *Assessment of Plans and Projects in relation to Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, September 2021)*

Appendix II Conservation Objectives of European sites

The conservation objectives for a European Site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below[10]:

The conservation status of a natural habitat will be taken as 'favourable' when:

- its natural range and the area it covers within that range are stable or increasing, and
- the specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future, and
- the conservation status of its typical species is favourable as defined (i).

The conservation status of a species will be taken as favourable when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

The 2019 Guidance from the European Commission[11] indicates that the general objective of achieving FCS for all habitat types and species listed in Annexes I and II to the Habitats Directive needs to be translated into site-level conservation objectives.

The European Commission guidance recommends that screening should fulfil the following steps:

1. ascertaining whether the plan or project is directly connected with or necessary to the management of a Natura 2000 site.
2. identifying the relevant elements of the plan or project and their likely impacts.
3. identifying which (if any) Natura 2000 sites may be affected, considering the potential effects of the plan or project alone or in combination with other plans or projects.
4. assessing whether likely significant effects on the Natura 2000 site can be ruled out, in view of the site's conservation objectives.

[10] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701

[11] Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2019)

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