Specialist Report: Ecology

R321966_Addendum report

Direction from Commission: Appropriate Assessment

Development	Road and water services upgrade works on Fortfield Road and College Drive.
Type of Application	Planning appeal 3rd Party
Topic	Direction from Commission: Appropriate Assessment
Ecologist	Paula Kearney BSc. CEcol. MCIEEM
Planning Inspector	Elaine Sullivan

Contents

1.0 Introduction

1.1. Background

1.1.1. Case ABP-321966-25 relates to the development on a site of 0.8112ha comprising water services and junction upgrade works along College Drive and the Fortfield Road in Terenure, Dublin 6W, located within the jurisdiction of South Dublin County Council (SDCC). The proposed upgrade works are to facilitate a concurrent Large-Scale Residential Development (LRD) planning application (ABP-322106-25) within the jurisdiction of Dublin County Council (DCC), which was granted with conditions by ACP in July 2025.

1.1.2. An Appropriate Assessment (AA) Screening Report and a Natura Impact Statement (NIS) were prepared Bryan Deegan of Altemar Ltd. for the entire project, including the subject works to upgrade water services and junction outside of the administrative area of the LRD. These reports were submitted as part of the ABP-322106-25 application documents. However, the same reports were not submitted in support of the subject works ABP-321966-25 application.

1.1.3. Therefore, to inform the statutory AA, An Coimisiún Pleanála requested an NIS under a Section 132 notice, which was issued to the applicant on the 8th August 2025 and received by the applicant on the 28th August 2025.

1.1.4. The proposed development is an urban site and does not lie adjacent to any European sites, with remote hydrological connection via the stormwater network and rivers to Dublin Bay and associated designated sites including the South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-West Irish Sea SPA (004236). The nearest European site is South Dublin Bay and River Tolka Estuary SPA (004024), 11km downstream of the site.

1.1.5. In my examination of the documents on file including the Planning Inspectors report and subsequent addendums, the Inspector screened out the need for AA. However, as the subject works were included in the AA Screening Report and NIS submitted with the LRD application, hydrological connectivity to European sites was identified and AA is required.

1.1.6. A Direction from the Planning Commissioner dated 09/02/2026 requested that the Commissions Ecologist provides an AA of the NIS.

1.1.7. The screening report identified 16no. European sites within 15km of the proposed development (see NIS Table 2) and screened in 5no. European sites. For this assessment, I used the Source-Pathway-Receptor (S-P-R) model and I identified tenuous connectivity for 5no. European sites via hydrological pathways.

1.2. Scope of report

1.2.1. This report to the Commission includes a review of the Screening for AA taking account of documents on the case file, Screening for Appropriate Assessment (stage1) and Appropriate Assessment (stage 2).

1.2.2. In my capacity of Inspectorate Ecologist with over 25 years professional experience, I have the relevant expertise to advise on and undertake Appropriate Assessment (AA) for the proposed works.

1.2.3. I have reviewed and examined the AA Screening Report including relevant appendices and figures. The documents have been reviewed with respect to the following current best practice guidance:

- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites. Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive 92/43/EC
- CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3

1.3. Note on Procedure

1.3.1. The first step in AA screening is to determine if screening is actually required. Projects that are directly connected to the management of a SAC or SPA are do not require consideration under the provisions of Article 6(3). This refers to projects that comprise habitat or species management plans to support achievement of conservation measures and are generally undertaken by nature conservation bodies.

1.3.2. Therefore, in addressing a point raised in public submissions, the proposed development does not fall under this category, i.e. it is not connected to the management of any European Site and requires consideration under the provisions of Article 6(3) of the EU Habitats Directive and Part XAB of the Planning and Development Act 2000 as amended.

1.3.3. AA is a focused assessment of the implications of a proposed development on Sites designated Special Areas of Conservation (SAC) and Special Protection Areas (SPA) under the EU Habitats and Birds Directives. The assessment is focused on the qualifying interest features only i.e. the habitats and species for which the site is designated.

2.0 Implications for European Sites

2.1. Natura Impact Statement Review

2.1.1. The screening report identified 16no. European sites within 15km of the proposed development (see NIS Table 2) and screened in 5no. European sites. Reliance on a standard 15 km Zone of Influence (ZoI) is no longer considered appropriate for assessing potential effects on European sites. Whereas the S-P-R model offers a more robust and defensible method for establishing the ZoI, as it is based on identifying the actual mechanisms through which impacts may occur.

2.1.2. Therefore, for completeness, I have also undertaken the AA Screening in addition to the AA as requested by An Coimisiún Pleanála (see Table 1 and Table 2) and my conclusions are set out in Section 3.1 and Section 3.2 below. For the AA screening of the proposed development I applied the S-P-R model.

3.0 Appropriate Assessment

3.1. Appropriate Assessment Screening (Stage 1)

3.1.1. In screening the need for appropriate assessment, it was not possible to exclude the possibility that the proposed development alone would result in significant effects on South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA

(004006), and North-West Irish Sea SPA (004236), in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of S177V was required.

3.2. Appropriate Assessment (Stage 2)

3.2.1. Following an examination, analysis and evaluation of the NIS all associated material submitted and taking into account observations I consider that from the scientific information submitted, it is possible to reach clear precise and definitive findings regarding the exclusion of adverse effects on the site integrity of South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), Howth Head Coast SPA (004113) and North-West Irish Sea SPA (004236).

Table 1: Screening for Appropriate Assessment **Stage 1: Test for likely significant effects**	
Step 1: Description of the project and local site characteristics	
Brief description of project	The project comprises proposed infrastructure works at the existing Fortfield Road / College Drive junction including the introduction of a signalised four-arm junction with pedestrian crossings provided to all arms. The proposed development also includes improvement and rationalisation of the existing footpaths (along Fortfield Road and College Drive) in the vicinity of the junction works. The watermain extension and connection relates to a proposed 150mm watermain extension connecting to the existing 180mm public watermain network on College Drive to service the proposed LRD.
Brief description of development site characteristics and potential impact mechanisms	The Fortfield Road is the principal road serving the consented LRD development. It links the site with the R137 Templeogue Road (to the south) and the R817 Wainsfort Road (to the north). The road provides vehicular access to several residential housing estates as well as many residential driveway accesses along the road. It is a single lane two-way carriageway with footpaths on both sides of the carriageway. Along Fortfield Road there is an unsignalised T-junction with College Drive, providing access to the R817 to the west. It is the intention of the proposed development to introduce a site entrance aligned with College Drive resulting in the proposed establishment of a 4 arm signalised junction at this location. College Drive is a

	single lane two-way carriageway connecting to Fortfield Road at a non-signalised T-junction. Footpaths are provided on both sides of the road with grass verges on either side of the trafficked lanes. 160m of new 150mm watermain will be installed in College Drive to link to existing 180mm MDPE watermain. No changes to the existing surface water drainage arrangements on the public road are proposed. All kerbs and associated stormwater gullies within the proposed work extents at the junction location will be repaired/renewed/reinstated as required. There are 2 no. kerb gullies on Fortfield Road and 2 no. stormwater grates on College Drive within the extents of the western/College Drive junction arm. There is a 300mm concrete stormwater sewer flowing south to north along Fortfield Road. This increases to 450mm on approach to the Greenlea Road junction. This sewer discharges to the River Poddle in the north, approximately 700m from the subject site. The River Poddle flows 4.4km northeast to meet the River Liffey which flows a further 3.3km to Dublin Bay. Dublin Bay supports a number of European sites including the South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-West Irish Sea SPA (004236). Based on the source pathway receptor model there is hydrological connectivity from the subject site to the aforementioned European sites via the connection to the stormwater sewer and receiving waterbodies. Potential impact mechanisms include indirect impacts from: • Construction related pollution and increased sedimentation via surface water discharge to adjacent stormwater sewer and receiving freshwater and marine waterbodies. Therefore, mitigation measures are required to ensure that surface water drainage will not contain silt or pollutants that could significantly impact upon the qualifying interests of these downstream European sites.
Screening report	Yes - Prepared by Bryan Deegan of Altemar Ltd. and submitted as part of concurrent application for a Large-Scale Residential Development (LRD) (ABP-322106-25) which was granted with conditions by ACP in July 2025.
Natura Impact Statement	Yes - Prepared by Bryan Deegan of Altemar Ltd. and submitted in response to a Section 132 notice issued to the applicant on the 8th August 2025. It is the same NIS submitted as part of

	concurrent application for a Large-Scale Residential Development (LRD) (ABP-322106-25) which was granted with conditions by ACP in July 2025.
Relevant submissions	Third party appeal does not include nature conservation related concerns.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

The screening report identified 16no. European sites within 15km of the proposed development (see NIS Table 2) and screened in 5no. European sites. For this assessment I used the source-pathway-receptor model and I identified tenuous connectivity for 7no. European sites via hydrological pathways. Although the subject site is a significant distance from the European sites with diluted pathways, a precautionary approach is taken due to uncertainties regarding the possibility for cumulative long-term effects to distant marine sites.

European Site (code)	**Qualifying interests[1]**	**Distance from proposed development (km)**	**Ecological connections[2]**	**Consider further in screening[3] Y/N**
South Dublin Bay SAC (000210)	1 x coastal habitat	11.7km downstream via the stormwater network to the River Poddle, River Liffey to Dublin Bay.	Yes (weak) Indirect via freshwater and marine waterbodies.	Yes
North Dublin Bay SAC (000206)	1 x coastal habitat 1 x plant species	12.6km downstream via the stormwater network to the River Poddle, River Liffey to Dublin Bay.	Indirect via freshwater and marine waterbodies.	Yes
South Dublin Bay and River Tolka Estuary SPA (004024)	13 x coastal birds Wetland and Waterbirds	11km downstream via the stormwater network to the River Poddle, River Liffey to Dublin Bay.	Yes (weak) Indirect via freshwater and marine waterbodies.	Yes

North Bull Island SPA (004006)	17 x coastal birds Wetland and Waterbirds	13.6km downstream via the stormwater network to the River Poddle, River Liffey to Dublin Bay.	Indirect via freshwater and marine waterbodies.	Yes
North-West Irish Sea SPA (004236)	21 x coastal and marine birds	17.4km downstream via the stormwater network to the River Poddle, River Liffey to Dublin Bay.	Indirect via freshwater and marine waterbodies.	Yes

[1] Summary description

[2] Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species

[3]if no connections: N

Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites

Site name **Qualifying interest (QI) features**	**Possibility of significant effects (alone) in view of the conservation objectives of the site***	
QI in potential zone of influence in Bold	**Impacts**	**Potential Effects**
Site 1: South Dublin Bay SAC (000210) **Mudflats and sandflats not covered by seawater at low tide [1140]** Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] [2110] Embryonic shifting dunes	Direct: No direct impact- All aspects of the proposal are outside of the SAC boundary Indirect: hydrological Potential for negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.	Decreased water quality: negative effect on habitat quality/ function which could undermine conservation objectives related to receiving coastal and marine habitats.
	Possibility of significant effects (alone) in view of the conservation objectives of the site	

	Yes	
QI in potential zone of influence in Bold	**Impacts**	**Effects**
Site 2: North Dublin Bay SAC (000206) **Mudflats and sandflats not covered by seawater at low tide [1140]** Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] **Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]** **Mediterranean salt meadows (Juncetalia maritimi) [1410]** Embryonic shifting dunes [2110] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes)* [2130] Humid dune slacks [2190] [1395] Petalwort	No direct impacts Indirect: hydrological Low potential for negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.	Decreased water quality: negative effect on habitat quality/ function which could undermine conservation objectives related to receiving marine and coastal wetland habitats.
	Likelihood of significant effects from proposed development (alone): Yes/ uncertainty as to degree of potential impacts	
QI in potential zone of influence in Bold	**Impacts**	**Effects**
Site 3: South Dublin Bay and River Tolka Estuary SPA (004024) **Light-bellied Brent Goose (Branta bernicla hrota) [A046]** **Oystercatcher (Haematopus ostralegus) [A130]** **Ringed Plover (Charadrius hiaticula) [A137]** **Grey Plover (Pluvialis squatarola) [A141]** **Knot (Calidris canutus) [A143]** **Sanderling (Calidris alba) [A144]**	No direct impacts Indirect: potential for negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.	Decreased water quality: may have a negative effect on the distribution, extent, abundance and availability of prey on which SCI species rely.

Dunlin (Calidris alpina) [A149] **Bar-tailed Godwit (Limosa lapponica) [A157]** **Redshank (Tringa totanus) [A162]** **Black-headed Gull (Chroicocephalus ridibundus) [A179]** **Roseate Tern (Sterna dougallii) [A192]** **Common Tern (Sterna hirundo) [A193]** **Arctic Tern (Sterna paradisaea) [A194]** **Wetland and Waterbirds [A999]**		
	Likelihood of significant effects from proposed development (alone): Yes/ uncertain	
QI in potential zone of influence in Bold	**Impacts**	**Effects**
Site 4: North Bull Island SPA (004006) **Light-bellied Brent Goose (Branta bernicla hrota) [A046]** **Shelduck (Tadorna tadorna) [A048]** **Teal (Anas crecca) [A052]** **Pintail (Anas acuta) [A054]** **Oystercatcher (Haematopus ostralegus) [A130]** **Golden Plover (Pluvialis apricaria) [A140]** **Grey Plover (Pluvialis squatarola) [A141]** **Knot (Calidris canutus) [A143]** **Sanderling (Calidris alba) [A144]** **Dunlin (Calidris alpina) [A149]** **Black-tailed Godwit (Limosa limosa) [A156]** **Bar-tailed Godwit (Limosa lapponica) [A157]** **Curlew (Numenius arquata) [A160]** **Redshank (Tringa totanus) [A162]** **Turnstone (Arenaria interpres) [A169]** **Black-headed Gull (Chroicocephalus ridibundus) [A179]**	No direct impacts Indirect: potential for negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.	Decreased water quality: may have a negative effect on the distribution, extent, abundance and availability of prey on which SCI species rely.

Shoveler (Spatula clypeata) [A857] **Wetland and Waterbirds [A999]**		
	Likelihood of significant effects from proposed development (alone): Yes/ uncertain	
QI in potential zone of influence in Bold	**Impacts**	**Effects**
Site 5: North-West Irish Sea SPA (004236) **Red-throated Diver (Gavia stellata) [A001]** **Great Northern Diver (Gavia immer) [A003]** **Fulmar (Fulmarus glacialis) [A009]** **Manx Shearwater (Puffinus puffinus) [A013]** **Cormorant (Phalacrocorax carbo) [A017]** **Shag (Phalacrocorax aristotelis) [A018]** **Common Scoter (Melanitta nigra) [A065]** **Black-headed Gull (Chroicocephalus ridibundus) [A179]** **Common Gull (Larus canus) [A182]** **Lesser Black-backed Gull (Larus fuscus) [A183]** **Herring Gull (Larus argentatus) [A184]** **Great Black-backed Gull (Larus marinus) [A187]** **Kittiwake (Rissa tridactyla) [A188]** **Roseate Tern (Sterna dougallii) [A192]** **Common Tern (Sterna hirundo) [A193]** **Arctic Tern (Sterna paradisaea) [A194]** **Guillemot (Uria aalge) [A199]** **Razorbill (Alca torda) [A200]** **Puffin (Fratercula arctica) [A204]** **Little Gull (Hydrocoloeus minutus) [A862]** **Little Tern (Sternula albifrons) [A885]**	No direct impacts Indirect: potential for negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.	Decreased water quality: may have a negative effect on the distribution, extent, abundance and availability of prey on which SCI species rely.

	Likelihood of significant effects from proposed development (alone): Yes/ uncertain

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

It is not possible to exclude the possibility that the proposed development alone would result in significant effects on South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-West Irish Sea SPA (004236) from effects associated with water pollution, potentially resulting in decreased habitat quality and reduction in prey availability for bird species listed for these sites.

An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in combination with other plans and projects is not required at screening stage.

Proceed to AA.

Table 2: Appropriate Assessment

The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, sections 177V of the Planning and Development Act 2000 (as amended) are considered fully in this section.

Taking account of the preceding screening determination, the following is an appropriate assessment (AA) of the implications of the proposed development in view of the relevant conservation objectives of South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-West Irish Sea SPA (004236) based on scientific information provided by the applicant and considering expert opinion through observations on nature conservation.

The information relied upon for the AA includes the following:

- Natura Impact Statement prepared by Bryan Deegan of Altemar Ltd.
- Conservation objectives for the European Sites and supporting documents from NPWS.ie

European sites

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

Summary of Key issues that could give rise to adverse effects (from screening stage):

• Water quality degradation (construction and operation)			
South Dublin Bay SAC (000210) (see NIS Table 4)			
Qualifying Interest features likely to be affected	**Conservation Objectives** **Targets and attributes (summary- inserted)**	**Potential adverse effects**	**Mitigation measures** **(summary)** From NIS Table 14
Mudflats and sandflats not covered by seawater at low tide [1140]	**Maintain favourable conservation condition**	Potential to undermine natural condition of community type. Potential to undermine water quality targets if source impacts of sufficient magnitude reach South Dublin Bay SAC.	Construction phase mitigation includes: Management of pollutants i.e. silt, concrete, hydrocarbons Operations phase mitigation includes: Petrol interceptors and surface and storm management through Sustainable Urban Drainage Systems (SuDS).
North Dublin Bay SAC (000206) (see NIS Table 7)			
Qualifying Interest features likely to be affected	**Conservation Objectives** **Targets and attributes (summary- inserted)**	**Potential adverse effects**	**Mitigation measures** **(summary)** From NIS Table 14
Mudflats and sandflats not covered by seawater at low tide [1140]	**Maintain favourable conservation condition**	Potential to undermine natural condition of community type. Potential to undermine water quality targets if source impacts of sufficient magnitude reach South Dublin Bay SAC.	Construction phase mitigation includes: Management of pollutants i.e. silt, concrete, hydrocarbons. Operations phase mitigation includes: Petrol interceptors and surface and storm management
Annual vegetation of drift lines [1210]	**Maintain favourable conservation condition**		
Salicornia and other annuals colonising mud and sand [1310]	**Restore favourable conservation condition**		

			through SuDS measures.
South Dublin Bay and River Tolka Estuary SPA (004024) (see NIS Table 9)			
Qualifying Interest features likely to be affected	**Conservation Objectives** **Targets and attributes (summary- inserted)**	**Potential adverse effects**	**Mitigation measures** **(summary)** From NIS Table 14
Light-bellied Brent Goose (Branta bernicla hrota) [A046], Oystercatcher (Haematopus ostralegus) [A130], Ringed Plover (Charadrius hiaticula) [A137], Knot (Calidris canutus) [A143], Sanderling (Calidris alba) [A144], Dunlin (Calidris alpina alpina) [A149], Bar-tailed Godwit (Limosa lapponica) [A157], Redshank (Tringa totanus) [A162], Black-headed Gull (Chroicocephalus ridibundus) [A179	**Maintain favourable conservation condition** Long term population trend stable or increasing No significant decrease in the range, timing or intensity of use of areas	Potential to undermine habitat quality for foraging if source impacts of sufficient magnitude Dublin Bay. No potential for ex-situ effects (disturbance).	As above for water quality
Wetland and Waterbirds	**Maintain favourable conservation condition** Area	No adverse effects on area	
North Bull Island SPA (004006) (see NIS Table 11)			
Light-bellied Brent Goose (Branta bernicla hrota) [A046], Shelduck (Tadorna tadorna) [A048], Teal (Anas crecca) [A052], Pintail (Anas acuta) [A054], Shoveler (Anas clypeata)	**Maintain favourable conservation condition** Long term population trend stable or increasing	Potential to undermine habitat quality for foraging if source impacts of sufficient magnitude reach Dublin Bay No potential for ex-situ effects (disturbance).	As above for water quality

[A056], Oystercatcher (Haematopus ostralegus) [A130], Golden Plover (Pluvialis apricaria) [A140], Grey Plover (Pluvialis squatarola) [A141], Knot (Calidris canutus) [A143], Sanderling (Calidris alba) [A144], Dunlin (Calidris alpina alpina) [A149], Black-tailed Godwit (Limosa limosa) [A156], Bar-tailed Godwit (Limosa lapponica) [A157], Curlew (Numenius arquata) [A160], Redshank (Tringa totanus) [A162], Turnstone (Arenaria interpres) [A169], Black-headed Gull (Chroicocephalus ridibundus) [A179	No significant decrease in the range, timing or intensity of use of areas		
Wetland and Waterbirds	**Maintain favourable conservation condition** Area	No adverse effects on area	
North-West Irish Sea SPA (004236) (see NIS Table 12)			
Red-throated Diver (Gavia stellata) [A001] Great Northern Diver (Gavia immer) [A003] Manx Shearwater (Puffinus puffinus) [A013]	Maintain favourable conservation condition Long term population trend stable or increasing No significant decrease in the range, timing or intensity of use of areas	Potential to undermine habitat quality for foraging if source impacts of sufficient magnitude reach Dublin Bay No potential for ex-situ effects (disturbance).	As above for water quality

Common Scoter (Melanitta nigra) [A065] Black-headed Gull (Chroicocephalus ridibundus) [A179] Common Gull (Larus canus) [A182] Lesser Black-backed Gull (Larus fuscus) [A183] Great Black-backed Gull (Larus marinus) [A187] Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Guillemot (Uria aalge) [A199] Razorbill (Alca torda) [A200] Little Gull (Hydrocoloeus minutus) [A862] Little Tern (Sternula albifrons) [A885]			
Fulmar (Fulmarus glacialis) [A009] Cormorant (Phalacrocorax carbo) [A017] Shag (Phalacrocorax aristotelis) [A018] Herring Gull (Larus argentatus) [A184] Kittiwake (Rissa tridactyla) [A188]	Restore favourable conservation condition Long term population trend stable or increasing No significant decrease in the range, timing or intensity of use of area	Potential to undermine habitat quality for foraging if source impacts of sufficient magnitude reach Dublin Bay No potential for ex-situ effects (disturbance).	As above for water quality

Puffin (Fratercula arctica) [A204]			

Assessment

Water quality degradation

The potential for deterioration of water quality and associated decreases in habitat quality is listed as a primary impact of the proposed development. This would be a temporary impact during construction and a potentially ongoing impact if not managed during operation via the road network.

Mitigation measures and conditions

The mitigation measures presented in Table 14 of the NIS and include a full suite of specific measures for the prevention of ingress of construction and operation phase contaminants to surface water are presented.

During the operation phase the Civil and Structural Engineering Services Report which has been prepared by Punch Consulting Engineers outlines the Proposed Surface Water Drainage System which includes Sustainable Urban Drainage Systems (SuDS). A variety of SuDS measures have been proposed to comply with Council recommendations. All SuDS measures are to be implemented with reference to the UK SuDS Manual and Dublin City Council drainage requirements.

Therefore, it is recommended that all mitigation measure as set out in the NIS and application documentation with regard to the protection of water quality are conditioned for this application.

In-combination effects

In-combination effects have been considered in the NIS. A list of planning applications within the zone of influence and an assessment and a conclusion that no significant effects are likely from in-combination effects

Findings and conclusions

The applicant determined that following the implementation of mitigation measures the construction and operation of the proposed development alone, **or in combination with other plans and projects**, will not adversely affect the integrity of this European site.

I am satisfied that there has been adequate consideration of the ecological baseline and the assessment of impacts with appropriate mitigation measures. Therefore, it is possible to come to clear, precise and definitive findings regarding impacts on the integrity of European sites from this proposed development.

Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-West Irish Sea SPA (004236) in view of the

conservation objectives of those sites and that Appropriate Assessment under the provisions of S177V/ 177AE was required.

Following an examination, analysis and evaluation of the NIS all associated material submitted and taking into account observations I consider that it is possible to reach clear precise and definitive findings regarding the exclusion of adverse effects on the site integrity of South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-West Irish Sea SPA (004236).

Signed

Paula Kearney

Senior Ecologist

09/03/2025