



An  
Coimisiún  
Pleanála

## Inspector's Report ACP-323804-25

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<b>Development</b>	NIS Determination Request - Synthetic Grass Sports Pitch at Greenhills Park, Dublin 12
<b>Location</b>	In the townlands of Greenhills and Limekilnfarm
<b>Planning Authority</b>	South Dublin County Council
<b>Planning Authority Reg. Ref.</b>	PT8SD292
<b>Applicant(s)</b>	Marston Planning Consultancy
<b>Type of Application</b>	Request for determination.
<b>Planning Authority Decision</b>	NIS not required
<b>Date of Site Inspection</b>	29/01/2026
<b>Inspector</b>	Hugh O'Neill

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## 1.0 Introduction

- 1.1. Pursuant to Article 250(3) of the Planning and Development Regulations 2001 as amended Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 as instructed by a number of local residents is seeking a determination from An Coimisiún Pleanála as to whether or not a Natura Impact Statement (NIS) is required to be prepared in respect of a South Dublin County Council (SDCC) proposal to construct a Synthetic Grass Sports Pitch at Greenhills Park, Dublin 12.

## 2.0 Background

- 2.1. In preparation for a Part 8 approval process South Dublin County Council (SDCC) commissioned an Appropriate Assessment (AA) screening report (dated September 2025) which, with the support of other related reports identified no likely significant effects to any European sites. This documentation formed part of a public consultation as part of the consent process under Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations, 2001 (as amended).
- 2.2. A determination that stage 2 AA is not required is recorded on record of executive business and chief executive orders PD/143/25 signed and dated 15/09/25. The order states:

*That South Dublin County Council as the Competent Authority having considered the AA Screening Report prepared by South Dublin County Council, makes a determination that a Stage 2: Appropriate Assessment will not be required to inform the development of a synthetic grass sports pitch at Greenhills Park, either alone or in combination with other plans or projects, with respect to any Natura 2000 site and its Conservation Objectives.*

- 2.3. Following notification by ACP of the application for AA and EIAR screening determinations dated 14/10/25 SDCC suspended the Part 8 process until ACP has made these determinations.

- 2.4. As the Part 8 process was suspended no third party, prescribed body or chief executive reports are on file.
- 2.5. This inspector report concerning the requirement for NIS for the project has been prepared in parallel with the request concerning the requirement for EIAR for the project reg ref: ACP-323803-25.

### **3.0 Site Location and Description**

- 3.1. The development is proposed in the location of and replacing existing grass pitches to the western side of Greenhills Park. Greenhills Park, including the community sports and leisure centre to the east, extends to circa 8ha of primarily active open space set out with grass pitches of various sizes, a bowling green the community centre and associated parking.
- 3.2. Greenhills Park is within an urban area. The immediate vicinity is dominated by Greenhills College, St. Pauls secondary school and Holy Spirit Primary School all either border or are in close proximity to the park with a number of further playing pitches, and courts associated with the schools.
- 3.3. The wider area is characterised primarily by residential development which borders the park. There is extensive open space provision within residential estates in the wider area.
- 3.4. There is an area of industrial estate development, Ballymount, c. 500 meters to the east.
- 3.5. Tymon Park, circa 100Ha of open space is located c.300 meters to the south of Greenhills Park.
- 3.6. No planning history is recorded for subject site. There is no recent history in the vicinity of relevance to the subject case.

### **4.0 Proposed Development**

- Construction of a synthetic grass 3G all-weather sports pitch.
- Perimeter fencing and ball stop fencing at rear of each goal.
- 6 no. floodlighting columns.

- A single storey modular prefabricated pavilion building consisting of two individual team changing rooms, club storage area and ancillary facilities.
- All associated ancillary works in adjacent areas including but not limited to foul & surface water drainage and utility supplies.
- Realignment of existing footpath over a length of 112 metres.
- All related hard and soft landscape works including connecting footpaths and associated planting.
- Storage Areas.
- CCTV.

4.1. Works required to accommodate the development include the following:

- Felling existing trees within the proposed pitch boundary and removal of stumps.
- Removal of existing pathway to the east of the proposed site, reinstatement of new section with tarmac paving. (112 linear meters)
- Stripping of topsoil.
- Excavation of ground to formation level.
- Trenching and laying of electricity, foul water and water supplies. Connections for foul and water supply to be along the eastern perimeter of the proposed pitch, connecting into services at Saint James's Road to the South of Green Hills Park.
- Backfilling and reprofiling works.
- Installation of base for pitch with drainage infrastructure.
- Construction of the pitch.
- Regrading and landscaping including planting of trees.
- A temporary construction compound would be located to the western end of the development site.

4.2. As public consultation phase of the project had not concluded at the time of receipt of the subject application no planning report has been prepared by SDCC, however technical inputs describing the proposal which contributed to the EIAR screening report and determination by the competent authority are as follows:

- Design and Access Statement by sportslandsconsult September 2025
- Lighting design report by musco dated 10 September 2025
- Tree Survey Plan, Trees Impact Plan, Schedule of Tree Data by SEDCC August 2025
- Greenhills Park Wintering Bird and Badger surveys, by Envirico
- Appropriate Assessment Screening Report, by Fehily Timoney dated September 2025
- Ecological Impact Assessment, by Fehily Timoney dated September 2025
- Report to Inform Environmental Impact Assessment (EIA) Screening by Fehily Timoney dated September 2025
- Flood Risk Assessment, by SEA Consulting Engineers Ltd dated September 2025
- Greenhills Park Landscape Management Plan, by SDCC dated September 2025.

## 5.0 Legislative & Policy Context

### 5.1. The Planning & Development Regulations, 2001, as amended:

5.2. Under the provisions of article 250(1) of the Planning and Development Regulations, 2001, as amended, where a local authority proposes to carry out a development it is required to carry out a screening of the proposed development to assess if the development individually or in combination with other plans or projects would be likely to have a significant effect on a European site.

5.3. If on the basis of a screening under 250(1), it cannot be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, would have a significant effect on a European site, the local authority is required to determine that appropriate assessment of the proposed development is required and to prepare an NIS and submit the proposed development for approval to the Board (now An Coimisiún) under section 177AE of the Planning and Development Act, 2000, as amended.

- 5.4. Article 250(3)(b) of the Planning and Development Regulations 2001, as amended, provides that where any person considers a development proposed to be carried out by a local authority would be likely to have a significant effect on a European site, he or she may apply to the Board (now An Coimisiún) for a determination as to whether the development would be likely to have such significant effect.
- 5.5. Article 250(3)(d) states that “where the Board makes a determination that a development would be likely to have a significant effect on a European site, it shall require the local authority to prepare, or cause to be prepared, a Natura Impact Statement.”
- 5.6. The EU Habitats Directive (92/43/EEC) deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) and 6(4) require an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European Site (SAC or SPA). The guidance contained in ‘Appropriate Assessment for Plans and Projects in Ireland -Guidelines for Planning Authorities’ (DoEHLG 2009) advises that all plans and projects not directly connected to, or, for the management of a Natura 2000 site must be assessed for its potential significant effects on that site before any decision is made to allow that plan or project to proceed. Each plan or project must also be assessed for its possible in-combination effects with other plans or projects. This process is designated ‘appropriate assessment’ and arises from obligations under Article 6(3) and 6(4) of the Habitats Directive.

## 6.0 Request for a Direction

- 6.1. The request for a Direction on behalf of 28 listed households, states that the AA Screening undertaken on behalf of South Dublin County Council is flawed on a number of grounds relating to the use of the park by wintering and migratory birds.
- 6.2. The request states that the conclusion is not informed by any
- winter bird survey and
  - appears to be solely based on distance to waterways, and marine waters, and scale of the proposed development.

- 6.3. The request states that the conclusion of the SDCC based on a one day ecological survey is flawed.
- 6.4. The request states that it is unclear if the site is hydrologically or hydrogeologically connected to the River Poddle that runs into the River Liffey at Wellington Quay. The request also states the proposal is within the River Dodder catchment, and within the River Camac catchment to the north.
- 6.5. The request describes the grave concerns of their clients that that inadequate consideration has been given in the EIAR Screening Report of other projects being undertaken simultaneously, particularly by the Council.
- 6.6. The request describes the proposal as a significant intensification.
- 6.7. The request directs the attention of An Coimisiún to the judgement in *Kelly & Ors. v An Bord Pleanála* (25 July 2014), and provides an opinion that the subject screening determination does not adhere to the findings of that judgement.
- 6.8. The request states that SDCC *failed to undertake adequate examination and analysis of the AA findings, particularly in relation to the potential impact of the proposal on the Rockabill to Dalkey SAC.*
- 6.9. The request states that the lack of *any meaningful biodiversity or ecological survey to establish the baseline of the site, and ecological value of the site in a wider capacity indicates that the AA is deeply flawed in this instance.*
- 6.10. The request states that the *part 8 application is premature, misleading, incomplete screening process for both EIA and AA screening, includes misleading statements and conclusions and lacks consideration of cumulative effects of other SDCC application, as well as the redevelopment of the Ballymount Industrial Estate under the City Edge Project, which seeks to repurpose lands for a wider and more residential nature, and where such lands are significantly deficient in terms of amenity space.*
- 6.11. The request concludes with a request for consideration by An Coimisiún if the approach taken by SDCC is project splitting.

## 7.0 Response of SDCC

7.1. In response to a request from ACP dated 15/10/25, SDCC submitted a copy for all associated documentation along with a submission in response to the issues raised in a report prepared on behalf of South Dublin County Council by Fehily Timoney titled *Response to NIS determination request relating to synthetic grass sports pitch at Greenhills Park, Dublin 12* dated November 2025 ref P25173-FT-EGN-XX-RP-EN-0002.

7.2. The documentation submitted to ACP by SDCC consists of the following:

- SDCC Greenhills Design and Access Statement
- Drawing 3465-SL-DR-010-LP-R00 Location Plan
- Drawing 3465-SL-DR-100-GA-R00 General Arrangement Plan
- Drawing 3465-SL-DR-200-DL-R00 Drainage Layout
- Drawing 3465-SL-DR-350-CD-R00 Construction Details
- Lighting Design
- Part 8 Public Notice (English)
- Cuid 8 Fógra Poiblí (as Gaeilge)
- Newspaper Notice
- AA Screening Report for the proposed development, Fehily Timoney and Company (12/09/2025)
- Ecological Impact Assessment Report for the proposed development, Fehily Timoney and Company (12/09/2025)
- EIA Screening Report for the proposed development, Fehily Timoney and Company (11/09/2025)
- Flood Risk Assessment for the proposed development, SEA Consulting Engineers, September 2025
- Drawing SDCC 3229-01 Greenhills Park Landscape Plan
- Drawing SDCC 3327-01 Site Notice Location Map

- Drawing SDCC 3327-03 Greenhills Park Proposed Pavilion
- Greenhills Wintering Bird and Badger Surveys, Envirico, April 2025
- Tree Survey Schedule
- Drawing 3328-01 Greenhills Tree Impacts Plan
- Drawing 3328-02 Greenhills Tree Survey
- EIA Screening Determination for the proposed development
- AA Screening Determination for the proposed development

7.3. The report in response to the screening request seeks to address 6 points which the report considers to be raised in the request. These points and the responses are summarised as follows:

**7.4. Absence of winter bird survey**

7.5. I note that the above referenced report of winter bird survey undertaken from December 2024 to March 2025 formed part of the published consultation material for the Part 8 process.

7.6. The SDCC response sets out in detail the methodology utilised for the screening undertaken and each step therein. The report quotes extracts of text from the winter bird survey in defence of the determination and provides additional assessment to assist ACP in reaching its determination

7.7. Black-headed Gull, Common Gull, Herring gull, Lesser Black-backed Gull and Oystercatcher were observed during the surveys each of which are Special Conservation Interest (SCIs) for Special Protection Areas (SPAs) up to 13 Km from the subject site.

7.8. An assessment to determine the magnitude of possible effects of the proposal on the SCI's in the survey area was undertaken in line with *Percival (2003). Birds and Wind Farms in Ireland: A Review of Potential Issues and Impact Assessment. December 2003.*

7.9. The magnitude of effects to *Herring gulls, Lesser Black-backed Gull, Oystercatcher* are found to be *Negligible, in that very slight change will occur to their baseline*

*populations. In relation to Common Gull and Black-headed Gull magnitude of effects was found to be Low, i.e. there will be a minor shift away from baseline conditions.*

7.10. In consideration of the suggestion that the initial AA screening determination was deficient the report states that the findings of this additional assessment *reflect the conclusion of the AA Screening Report which has regard to foraging ranges and habitat suitability. The conclusion of no significant effects stands.*

**7.11. Hydrology and hydrogeology**

7.12. In response to Point 2 that hydrological and hydrogeological connections are unclear the report sets out the content and methodology as described in section 2.5 of the AA screening report.

7.13. In addition to restating the consideration given to the hydrology of the area in the AA screening report, the report also describes the urban environment between the subject site and the Poddle River which is the watercourse nearest to the site at 369m.

**7.14. Rockabill to Dalkey Special Area of Conservation (SAC)**

7.15. In response to point 3, potential effects on Rockabill to Dalkey Special Area of Conservation (SAC) the report states that the zones of influence are set out to ascertain Source Pathway Receptor (S-P-R) connectivity and connectivity to all SAC's were ruled out.

7.16. As the request has raised concerns with regard to the exclusion of this specific SAC the response provides a further consideration including setting out of the specific distance to and conservation objectives of this SAC, concluding again that it is ruled out.

**7.17. Screening report not based on best scientific knowledge**

7.18. The response states that the AA Screening Report has been conducted in accordance with referenced, up-to-date and best scientific knowledge and guidance and provides definitive findings.

**7.19. Lack of meaningful biodiversity or ecological survey**

7.20. The response states that the AA Screening Report is based on the field survey undertaken by FT on 16/07/2025 and desktop study. For the assistance of ACP in making its determination a further assessment in relation to avian SCIs is set out in the report as noted above.

**7.21. No adequate consideration of the effects of the proposed development in-combination effects**

7.22. The response includes, for the assistance of ACP, a table of other plans and projects in the area.

## **8.0 Screening for Appropriate Assessment**

### **8.1. Step 1 Description of the project and local site characteristics**

### **8.2. Description of proposed works**

8.3. the proposed development on a site of circa 1.6Ha comprises the following:

- Construction of a synthetic grass 3G all-weather sports pitch.
- Perimeter fencing and ball stop fencing at rear of each goal.
- 6 no. 21.3m high floodlighting columns.
- A single storey modular prefabricated pavilion building consisting of two individual team changing rooms, club storage area and ancillary facilities. 108.6sqm.
- All associated ancillary works in adjacent areas including but not limited to foul & surface water drainage and utility supplies.
- Realignment of existing footpath over a length of 112 metres.
- All related hard and soft landscape works including connecting footpaths and associated planting.
- Storage Areas.
- CCTV.

8.4. Works required include the following:

- Felling existing trees within the proposed pitch boundary and removal of stumps.
- Removal of existing pathway to the east of the proposed site, reinstatement of new section with tarmac paving. (112 linear meters)
- Stripping of topsoil.
- Excavation of ground to formation level.
- Installation of drainage infrastructure.
- Build up for construction of pitch and spectator hardstanding area.
- Trenching and laying of electricity, foul water and water supplies. Connections for foul and water supply to be along the eastern perimeter of the proposed pitch, connecting into services at Saint James's Road to the South of Green Hills Park.
- Backfilling and reprofiling works.
- Fencing, 4.5m high twin wire perimeter fencing, 1.2m high rebound fencing, and 13m high ball stop netting.
- A temporary construction compound would be located to the western end of the development site.
- Planting of trees.

8.5. On completion the all-weather sports pitch is to be managed by SDCC.

#### 8.6. **Existing Environment**

8.7. The proposal and the report to inform the AA determination was supported by surveys and reporting that describe the location of the proposal in detail. I have taken each of these reports as well as the subsequent response to AA determination request report into account in the assessment of this criteria for determination.

8.8. The development is proposed in the location of and replacing existing grass pitches to the western side of Greenhills Park.

8.9. Greenhills Park including the community centre extends to circa 8ha consisting primarily of active open space including grass pitches of various sizes and an artificial surface bowling green.

- 8.10. The footprint of the development is dominated by amenity grassland laid out and managed as sports pitches, a tarmacadam footpath and associated trees. There are a number of areas of grass unsuitable for sports pitches within the park which are being managed for biodiversity.
- 8.11. The project site falls into CAMAC\_040 sub-basin (IE\_EA\_09C020500), which forms part of the larger Liffey sub-catchment (Liffey\_SC\_090), and the Poddle\_010 sub-basin (IE\_EA\_09P030800) which forms part of the Dodder sub-catchment (Dodder\_SC\_010) and all of which are part of the Liffey and Dublin Bay Catchment (ID: 9). There are no water bodies or surface water connections to water bodies within the site. The groundwater body underlying the site is recorded as Dublin IE\_EA\_G\_008.
- 8.12. The area surrounding the park is dominated by residential development. There are 3 schools to the southern boundary. There are multiple open spaces in residential areas in the wider area many with grass pitches. Tymon Park is a regional scale park located at a distance of c. 300m to the south of Greenhills Park and extends to and along the eastern boundary of the M50.
- 8.13. There is an extensive area of industrial estate approximately 500m to the east of Greenhills Park.
- 8.14. The area of the subject development is subject to regular disturbance through human activity including sporting activities, maintenance activities and dog walking, observed as off lead.
- 8.15. **Existing Ecological Baseline**
- 8.16. The site of the proposal is currently amenity grassland laid out and managed as sports pitches with 112 linear meters of tarmacadam pathway and 8 trees.
- 8.17. Habitats I observed in the park, classified to Fossit are comprised of:
- GA2 - Amenity grassland,
  - BL3 - Buildings and artificial surfaces,
  - WL1 - Hedgerows,
  - GS2 - Dry meadows and grassy verges,

- BL1 - Stone walls and other stonework,
- WS1 - Scrub,
- WD1 - (Mixed) broadleaved woodland,
- WL2 - Treelines,
- WD5 - Scattered trees and parkland

8.18. No wetlands or water bodies were observed in the vicinity of the proposal on site or desktop survey.

### 8.19. **Hydrology and Geohydrology**

8.20. No direct surface water drainage routes were identified onsite or in desktop assessment.

8.21. The project site falls into CAMAC\_040 sub-basin (IE\_EA\_09C020500), which forms part of the larger Liffey sub-catchment (Liffey\_SC\_090), and the Poddle\_010 sub-basin (IE\_EA\_09P030800) which forms part of the Dodder sub-catchment (Dodder\_SC\_010) and all of which are part of the Liffey and Dublin Bay Catchment (ID: 9)

8.22. The groundwater body underlying the site is recorded as Dublin IE\_EA\_G\_008.

### 8.23. **Potential Impact Mechanisms**

8.24. The Appropriate Assessment Screening report September 2025 identified the following potential impacts arising from the development for consideration see report for full references:

- Direct and indirect impacts on habitats - the potential for biophysical change by disturbance/damage/ degradation
- Sensitivity to dust
- Impacts on surface waters
- Impacts on groundwater dependant terrestrial ecosystems (GWDTE)
- Disturbance of birds.

8.25. I consider these potential impacts to represent a comprehensive and precautionary, initial set of potential impact mechanisms taking account of the nature of the proposal.

8.26. **Step 2 Identification of Natura 2000 Sites using the Source-pathway-receptor model:**

In addition to the approach undertaken in the SDCC screening the following is a tabular approach to identification of Natura 2000 sites in accordance with standard ACP practice.

European Site (code)	Qualifying interests Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections	Consider further in screening Y/N
SPA South Dublin Bay and River Tolka Estuary SPA ( <a href="#">004024</a> )	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] Dunlin (Calidris alpina) [A149] Bar-tailed Godwit (Limosa lapponica) [A157] Redshank (Tringa totanus) [A162] Black-headed Gull (Chroicocephalus ridibundus) [A179]	8.8	Wintering Bird Survey by Envirico (April 2025) bird surveys identified the following QI's in the area: <ul style="list-style-type: none"> <li>Black-headed Gull (Chroicocephalus (Larus) ridibundus),</li> <li>Oystercatcher (Haematopus ostralegus)</li> </ul>	Y

	Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Wetland and Waterbirds [A999]			
North Bull Island SPA <a href="#">(004063)</a>	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]	<b>11.8</b>	Wintering Bird Survey by Envirico (April 2025) bird surveys undertaken on 15 sperate dates at high tide from December 2024 to March 2025 identified the following QI's in the area: <ul style="list-style-type: none"> <li>• Black-headed Gull (Chroicocephalus (Larus) ridibundus),</li> <li>• Oystercatcher (Haematopus ostralegus)</li> </ul>	<b>Y</b>

	<p>Curlew (Numenius arquata) [A160] Redshank (Tringa totanus) [A162] Turnstone (Arenaria interpres) [A169] Black-headed Gull (Chroicocephalus ridibundus) [A179] Shoveler (Spatula clypeata) [A857] Wetland and Waterbirds [A999]</p>			
<p><b>Glenasmole Valley SAC</b> <a href="#">(001209)</a></p>	<p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Petrifying springs with tufa formation (Cratoneurion) [7220]</p>	<b>6</b>	<b>None</b>	<b>N</b>
<p><b>Wicklow Mountains SPA</b> <a href="#">(004040)</a></p>	<p>Merlin (Falco columbarius) [A098] Peregrine (Falco peregrinus) [A103]</p>	<b>8.5</b>	<b>None</b>	<b>N</b>
<p><b>Wicklow Mountains</b></p>	<p>Oligotrophic waters</p>	<b>8.5</b>	<b>None</b>	<b>N</b>

<p><b>SAC</b> <b>(002122)</b></p>	<p>containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with Erica tetralix [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Calaminarian grasslands of the Violetalia calaminariae [6130] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] Calcareous rocky slopes with chasmophytic</p>			
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	<p>vegetation [8210]  Siliceous rocky slopes with chasmophytic vegetation [8220]  Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]  Lutra lutra (Otter) [1355]</p>			
<p><b>South Dublin Bay SAC</b>  <a href="#">(000210)</a></p>	<p>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]  Embryonic shifting dunes [2110]</p>	<b>8.8</b>	<b>None</b>	<b>N</b>
<p><b>Rockabill to Dalkey Island SAC</b>  <a href="#">(003000)</a></p>	<p>Reefs [1170]  Phocoena phocoena (Harbour Porpoise) [1351]</p>	<b>16.5</b>	<b>None</b>	<b>N</b>
<p><b>North-west Irish Sea SPA</b>  <a href="#">(004236)</a></p>	<p>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]</p>	<b>13</b>	<p>Wintering Bird Survey by Envirico (April 2025) bird surveys undertaken on 15 sperate dates at high tide from December 2024 to March 2025 identified the following QI's in the area:</p> <ul style="list-style-type: none"> <li>• Black-headed Gull (Chroicocephalus (Larus) ridibundus)</li> <li>• Common Gull (Larus canus)</li> </ul>	<b>Y</b>

	<p>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]</p>		<ul style="list-style-type: none"> <li>• Herring gulls (Larus argentatus)</li> <li>• Lesser Black-backed Gull (Larus fuscus)</li> </ul>	
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	Little Tern (Sternula albifrons) [A885]			
<b>Note:</b> No surface water or ground water connectivity of significance to the conservation objectives of any European site has been identified, therefore related potential impacts were screened out due to the absence of a pathway.				

8.27. **Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites**

**AA Screening matrix**

Qualifying interests (QI's) /Special Conservation Interests (SCI's)	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
<p><b>Site 1:</b> SPA South Dublin Bay and River Tolka Estuary SPA (<a href="#">004024</a>) CO to maintain:</p> <ul style="list-style-type: none"> <li>Oystercatcher (Haematopus ostralegus) [A130]</li> <li>Black-headed Gull (Chroicocephalus ridibundus) [A179]</li> </ul>	<ul style="list-style-type: none"> <li>vegetation clearance resulting in reduction in habitat</li> <li>construction phase disturbance</li> <li>operational phase disturbance</li> </ul>	<p>The extent of habitat reduction, and potential for habitat and species fragmentation as a result of the development relative to the abundance of amenity/sports pitch grassland in the immediate and wider vicinity of the proposal is of an extent such that it would not interfere with the key relationships contributing to achievement of the Conservation Objective of maintaining populations of blackheaded gulls and of restoring oyster catcher populations.</p> <p>The SDCC submitted response to NIS Determination Request presented an additional assessment to determine the magnitude of possible effects on the baseline number of individuals observed in the wider Greenhills Park. The assessment was undertaken in accordance with referenced published methodologies. The conclusion of the assessment was that potential worst case magnitude of effect on black headed gull SCI to be low and on oystercatcher to be negligible. This expert opinion determined no potential for significant effects on these CO's which seek to maintain</p>

		and restore populations of blackheaded gulls and oystercatchers respectively.
	<b>Likelihood of significant effects from proposed development (alone): N</b>	
	<b>Impacts</b>	<b>Effects</b>
<b>Site 2:</b> North Bull Island SPA (004063) CO to Maintain the following QI's Oystercatcher (Haematopus ostralegus) [A130] Black-headed Gull (Chroicocephalus ridibundus) [A179]	<ul style="list-style-type: none"> <li>• vegetation clearance resulting in reduction in habitat</li> <li>• construction phase disturbance</li> <li>• operational phase disturbance</li> </ul>	<p>The extent of habitat reduction, and potential for habitat and species fragmentation as a result of the development relative to the abundance of amenity/sports pitch grassland in the immediate and wider vicinity of the proposal is of an extent such that it would not interfere with the key relationships contributing to achievement of the Conservation Objective of maintaining populations of blackheaded gulls and of restoring oyster catcher populations.</p> <p>The SDCC submitted Response to NIS Determination Request have presented an additional assessment to determine the magnitude of possible effects on the baseline number of individuals observed in the wider Greenhills Park. The assessment was undertaken in accordance with referenced published methodologies. The conclusion of the assessment was that potential worst case magnitude of effect on black headed gull SCI to be low and on oystercatcher to be negligible. This expert opinion determined no potential for significant effects on these CO's which seek to maintain and restore populations of blackheaded gulls and oystercatchers respectively.</p>
	<b>Likelihood of significant effects from proposed development (alone): N</b>	
	<b>Impacts</b>	<b>Effects</b>
<b>Site 3:</b> North-west Irish Sea SPA ( <a href="#">004236</a> ) QI's	<ul style="list-style-type: none"> <li>• vegetation clearance resulting in reduction in habitat</li> </ul>	<p>The extent of habitat reduction, and potential for habitat and species fragmentation as a result of the development relative to the abundance of amenity/sports pitch grassland in the immediate and</p>

<p>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]</p>	<ul style="list-style-type: none"> <li>• construction phase disturbance</li> <li>• operational phase disturbance</li> </ul>	<p>wider vicinity of the proposal is of an extent such that it would not interfere with the key relationships contributing to achievement of the Conservation Objective of maintaining populations of SCI's. The Fehily Timoney in the submitted, Response to NIS Determination Request have presented an additional assessment to determine the magnitude of possible effects on the baseline number of individuals observed in the wider 8ha Greenhills Park. The assessment was undertaken in accordance with referenced published methodologies. The conclusion of the assessment was a potential worst case magnitude of effect on black headed gull and common gull SCI's to be low and on herring gull and lesser black backed gull to be negligible. This expert opinion determined no potential for significant effects on these CO's which seek to maintain populations of blackheaded, common and lesser blackbacked gulls and to restore oystercatcher populations.</p>
	<p><b>Likelihood of significant effects from proposed development (alone): N</b></p>	
<p><b>In combination effects:</b></p>	<p>A consideration of in combination effects was undertaken by Fehily Timoney in the submitted, response to NIS determination request report and is presented with an extensive list of plans and projects considered in appendix 5 thereof.</p> <p>In this regard, having considered the planning history of the surrounding area and the potential plans identified in the screening exercise, I am satisfied that the that the proposed development would have no likely significant effect in combination with other plans and projects on the qualifying features of any European sites and therefore no further assessment is required for the project.</p>	
<p><b>Notes:</b>  For the purpose of assessing the magnitude of potential impact on SCI's, peak bird count numbers for each SCI were utilised. These peak counts were for the entirety of Greenhills Park of which the proposed development will directly impact on only a small portion, with extensive amenity grassland and playing pitches remaining in the</p>		

park not impacted by the proposal and continuing to provide equivalent general and sport amenity grassland.

The conservation objective (CO) for oystercatcher and herring gull are to restore the favourable conservation condition, with the CO for blackheaded and lesser black backed gulls to maintain favourable condition.

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

I conclude that the proposed development (alone) would not result in likely significant effects on

- South Dublin Bay and River Tolka Estuary SPA(IE0004024)
- North Bull Island SPA (IE0004006)
- North-west Irish Sea SPA (IE0004236)

The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s).

No further assessment is required for the project.

No mitigation measures are required to come to these conclusions.

### 9.0 **Conclusion on AA Screening – Screening Determination**

Finding of no likely significant effects.

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on

- South Dublin Bay and River Tolka Estuary SPA(IE0004024)
- North Bull Island SPA (IE0004006)
- North-west Irish Sea SPA (IE0004236)

in view of the conservation objectives of these sites and is therefore excluded from further consideration.

Appropriate Assessment is not required.

This determination is based on:

- Objective information presented in the Screening Report, and the report in response to NIS Determination request
- The limited zone of influence of potential impacts
- The urban location of the site, at a distance of circa 6km from the nearest European site
- The absence of any significant surface water connection to any European site.
- The absence of any connection to a Groundwater Dependent European site.
- The absence of any significant ecological connection to any European site.
- The results of winter bird surveys confirming species and numbers of SCI's for SPA's within 15km.

## 10.0 Recommendation

I recommend that the applicant for the determination and South Dublin County Council be advised that the preparation of a Natura Impact Statement in respect of the proposed Synthetic Grass Sports Pitch at Greenhills Park, Dublin 12 is not required for the reasons and considerations set out below.

## 11.0 Reasons and Considerations

- The limited zone of influence of potential impacts
- The urban location of the site, at a distance of circa 6km from the nearest European site
- The absence of any significant surface water connection to any European site.
- The absence of any connection to a Groundwater Dependent European site.
- The absence of any significant ecological connection to any European site.

- The results of winter bird surveys confirming species and numbers of SCI's for SPA's within 15km.

It is considered reasonable to conclude that on the basis of the information available, which is considered adequate to issue a screening determination, that the proposed development, either individually or in combination with other plans or projects, would not be likely to have a significant effect on the identified European sites, in view of the conservation objectives of these sites and that a Stage 2 AA and the submission of a NIS for the proposed development is not required.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

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Hugh O'Neill  
Planning Inspector  
06 February 2026