

**Proposed Development (Phase 2) on
Lands at Mooretown, Swords, Co.
Dublin**

**APPROPRIATE ASSESSMENT SCREENING
REPORT**

Environmental
Assessment
**Built
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**Brady Shipman
Martin**

**Built.
Environment.**

Client:

Fingal County Council

Date:

26 May 2026

DOCUMENT CONTROL SHEET

7244_RPAA01_APPROPRIATE ASSESSMENT SCREENING REPORT

Project No. 7244
Client: Fingal County Council
Project Name: Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin
Report Name: APPROPRIATE ASSESSMENT SCREENING REPORT
Document No. RPAA01
Issue No. 02
Date: 26/05/2026

This document has been issued and amended as follows:

Issue	Status	Date	Prepared	Checked
01	Draft	18 May 2026	SG	MH
02	Final	26 May 2026	SG	MH



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1 Introduction

1.1 Background

Brady Shipman Martin (BSM) has been instructed by Fingal County Council (the Applicant, also referred to as FCC) to prepare this *Appropriate Assessment Screening Report* to submit to An Coimisiún Pleanála (ACP) in support of a planning application under Section 175 of the *Planning and Development Act 2000 (as amended)* for Phase 2 of development at Mooretown, Swords, Co. Dublin.

The purpose of the appropriate assessment screening exercise is to assess, in view of best scientific knowledge, if the proposed 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.

Fingal County Development Plan 2023-2029 contains policies and objectives relevant to Screening for Appropriate Assessment / Appropriate Assessment, including DMSO3, Local Authority Development, which states “*Ensure Local Authority development proposals are subject to environmental assessment, as appropriate, including Screening for Appropriate Assessment...*”.

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

1.2 Expertise and Qualifications

This AA Screening Report has been prepared by Sadye Goldfarb, Ecologist at Brady Shipman Martin. Sadye holds a bachelor’s degree in Environmental Science from the University of Vermont and a master’s degree in Biodiversity and Conservation from Trinity College Dublin. She is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management and is experienced in drafting and reviewing AA Screening Reports, Natura Impact Statements, EIA Screening Reports and SEA Screening Reports. She is also experienced in undertaking baseline ecological surveys, preparing Ecological Impact Assessments (EclA), and undertaking Biodiversity Net Gain (BNG) assessments.

A technical review of this document has been completed by Senior Ecologist and Associate, 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).

1.3 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)¹ (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
- (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 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:

- 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*.
- 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).

¹ SI No. 477 of 2011

- 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 (2018). *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC* (Commission Notice C (2018) 7621 final).
- 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)² (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*.
- National Parks and Wildlife Service (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*.

2.2 Baseline Data Collection and Field Visits

A desk-based assessment was undertaken between February and May 2026 of the Mooretown site and its environs. This built on previous assessments that were carried out by Brady Shipman Martin in 2024 as part of the Part 8 process related to Phase 1 of the Mooretown development, now under construction.

The current assessment focused on habitats and species that are listed as Qualifying Interests (QI) (in the case of SACs) and Special Conservation Interests (SCI) (in the case of SPAs) in the designations for European sites. Other biodiversity-related matters are considered in Chapter 8 of the EIAR.

A full habitat survey of the site, including rare and legally protected plants and invasive species, was carried out by Ecologist Ms Sadye Goldfarb of Brady Shipman Martin on 29 October 2025 and 25 February 2026.

Ornithologist Mr John Fox and bat and large mammal specialist Mr Brian Keeley and others from Wildlife Surveys Ireland (WSI) have also undertaken biodiversity surveys at the site as part of this project. These surveys, which include large mammal surveys, bat surveys, breeding bird surveys and winter bird surveys, commenced in November 2025 and continued until May 2026.

Biodiversity surveys were undertaken on the following dates:

- Habitat and botanical surveys (Brady Shipman Martin)
 - Detailed habitat and botanical surveys as well as large mammal surveys took place on 29 October 2025, 25 February 2026 and 18 May 2026.
- Bat and large mammal Surveys (Wildlife Surveys Ireland)
 - 18 and 19 May 2026 (bats, including dusk/dawn bat detector surveys)
- Bird surveys (Ornithologist John Fox):
 - A total of five winter bird visits were carried out between November 2025 and March 2026
 - A total of three breeding bird visits were carried out, in April and May 2026

There are no bat species listed as Qualifying Interests 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*. The bat surveys

² Now Transport Infrastructure Ireland (TII).

undertaken are consistent with the level of survey recommended in the NPWS document *Bat Mitigation Guidelines for Ireland V2– Irish Wildlife Manuals No. 134 (2022)* and *Bat Mitigation Guidelines for Ireland- Irish Wildlife Manuals No. 25 (2006)*. The surveys focussed on all Irish bat species that are fully protected under the Wildlife Act 1976 and subsequent amendments, and under the EU Habitats Directive, which is transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). An examination of available information from Bat Conservation Ireland (BCI), previous data from neighbouring sites was also undertaken to compile a list of most likely species in the overall area in addition to the evaluation of the habitat for bats.

The surveys confirm that there is no bat roosting activity on the site, and there are no features suitable for use by roosting bats, or otters³. Overall, bat activity during emergence/bat detector surveys undertaken in May 2026 recorded very low bat activity at the site.

An assessment of habitat suitability for species with links to European sites has been undertaken, in order to appraise the potential for *ex-situ* effects on European sites. The surveys have confirmed that the subject site is entirely unsuitable for use by bird species such as light bellied Brent goose, and other species listed as Special Conservation Interest (SCI) species in European sites within the Zone of Influence of the proposed development (see Section 5).

In addition to the biodiversity surveys carried out, an arboricultural survey was undertaken by arborist Mr. Charles McCorkell on 22 October 2025. The Tree Survey Report is presented separately.

Information was collated from the organisations and websites listed below:

- 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 (NDBC) (www.biodiversityireland.ie).
 - BirdWatch Ireland (www.birdwatchireland.ie).
 - Bat Conservation Ireland (www.batconservationireland.org).
- Information on land-use zoning from the online mapping of the Department of the Environment, Community and Local Government (<http://www.myplan.ie/en/index.html>).
- Recent and historical OSI mapping and aerial photography, including www.geohive.ie.
- Photographs taken at the site.
- 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, December 2025);
- Ireland's 4th National Biodiversity Plan 2023 – 2030 (Department of Housing, Local Government and Heritage, 2024).

³ The surveys cover otters and bats, neither of which species is listed as Qualifying Interests in any European sites within the Zone of Influence (refer to Section 4.2). 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*. Therefore, an assessment of the suitability of the site for use by bats and otters was made and can be found in the biodiversity chapter of the EIAR that accompanies the planning application.

- Fingal Development Plan 2023 – 2029, including the accompanying Appropriate Assessment documentation (Natura Impact Report).
- Fingal Biodiversity Action Plan 2023-2030.
- Climate Action Plan 2024 & 2025.

The report takes full account of the design of the proposed development and a detailed examination of all relevant elements of the proposed development was undertaken.

3 Description of the Proposed Development

3.1 Site Location

The site of the proposed residential development (see **Figure 3.1**) is a greenfield site located at Rathbeale Road, Swords, Co. Dublin within the townland of Mooretown, c. 3km west of Swords town centre and c. 20km north of Dublin City Centre. The subject lands are positioned within an established and expanding residential area and represent a strategic infill opportunity to deliver a high-quality residential development that benefits from existing and proposed connectivity to both Swords and Dublin City.

The overall site is bound by several established residential communities including Oldtown to the north, Cian Lea to the east and Swords Manor to the south. The existing residential surrounds are largely characterised by detached, semi-detached and terrace dwellings of two to three storeys. To the west, the site adjoins Swords Community College and several permitted development schemes, some currently under construction.

The site of the proposed development is divided into two parcels of land, located to the north and south of the Mooretown Phase 1 residential development (Planning Ref. LADP/002/24) currently under construction.

The northern parcel is immediately opposite to Rathbeale Archaeological Park located along Rathbeale Road (R125). The eastern border of this parcel is enclosed by the Mooretown Phase 1 development, and the western border is alongside a residential estate (Cronan's Well Park) and a privately owned bungalow.

The southern parcel is bordered by residential developments, Cianlea and Ormond Crescent, with the permitted development (Planning Ref SHD/012/21), currently under construction located to the west. St Cronan's well is located within the southern site, which once provided water to the Glasmore Abbey ruins located outside the eastern border of the site. Both the northern and southern parcels contain archaeological constraints below ground, which will be retained as open space for the development.

The site is located within the administrative boundary of Fingal County Council (FCC), in the townlands of Mooretown. In the Fingal Development Plan 2023–2029, the Mooretown lands are zoned RA - Residential Area, with the zoning objective to 'provide for new residential communities subject to the provision of the necessary social and physical infrastructure'.



Figure 3-1 The location of the proposed development site at Mooretown, Swords, Co. Dublin (the red line is indicative, please refer to the architectural and planning drawings that accompany the planning application for full details).

3.2 Development Description

The proposed development consists of 360 no. residential units; a mix of houses, own-door duplexes, and apartments arranged in urban blocks ranging from 2- to 5-storeys, at a net density of 41 dwellings per hectare. A 2-storey crèche of c. 670 sq.m is proposed at the centre of the site. Supporting infrastructure proposed includes 580 no. car parking spaces (resident and visitor), 1,009 no. cycle parking spaces, public open space, communal amenity space, pedestrian and cycle links, hard and soft landscaping, connections to all utilities, and all associated and enabling site works.

The proposed site layout and landscape design are shown in **Figure 3.2**.



Figure 3-2 General landscape masterplan for the proposed development (this image is a screengrab from the general landscape plan prepared by Simon Ronan Landscape Architecture. For full details refer to SRLA drg Plan L-100 for full details).

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 the 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 sections 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 177AE 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 established precedent and 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 that links the construction site to the

designated site). 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 proposed development, and in accordance with the source-pathway-receptor model, the potential Zone of Influence for the proposed development is:

- Any site to which there is a pathway from the proposed development site during either the construction or operational phase of the development 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

The site of the proposed development is not under any designation for nature conservation. There are no European sites within the immediate vicinity of the proposed development site at Mooretown, Swords, Co. Dublin.

The nearest sites are as follows (see also **Figure 4.1**):

- **Special Areas of Conservation (SAC)**
 - Malahide Estuary SAC (site code 000205), c. 2.1km to the east.
 - Rogerstown Estuary SAC (site codes 000208), c. 4.7km to the north-east.
 - Baldoyle Bay SAC (site code 000199), c. 8.6km to the south-east.
 - Rockabill to Dalkey Island SAC (site code 003000), c. 11.4km to the east.

- North Dublin Bay SAC (site code 000206), c. 11.4km to the south-east.
- Ireland's Eye SAC (site code 002193), c. 13.2km to the south-east.
- Lambay Island SAC (site code 000204), c. 14km to the north-east.
- Howth Head SAC (site code 000202), c. 14.2km to the south-east.
- South Dublin Bay SAC (site code 000210), c. 14.7km to the south-east.
- Rye Water Valley/Carlton SAC (site code 001398), c. 19.8km to the south-west.

■ **Special Protection Areas (SPA)**

- Malahide Estuary SPA (site code 004025), c. 2.5km to the north-east.
- Rogerstown Estuary SPA (site code 004015), c. 5.3km to the north-east.
- North-West Irish Sea SPA (site code 004236), c. 7.6km to the east.
- Baldoyle Bay SPA (site code 004016), c. 8.6km to the south-east.
- North Bull Island SPA (site code 004006), c. 11.2km to the south-east.
- South Dublin Bay and River Tolka Estuary SPA (site code 004024), c. 11.8km to the south-east.
- Ireland's Eye SPA (site code 004117), c. 12.8km to the south-east.
- Lambay Island SPA (site code 004069), c. 13.8km to the north-east.
- Howth Head Coast SPA (site code 004113), c. 15.0km to the south-east.
- Skerries Island SPA (site code 004122), c. 15.2km to the north-east.
- Rockabill SPA (site code 004014), c. 16.4km to the north-east.

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

Site Specific Conservation Objectives have been established for all the listed European sites. 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**.

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin
APPROPRIATE ASSESSMENT SCREENING REPORT

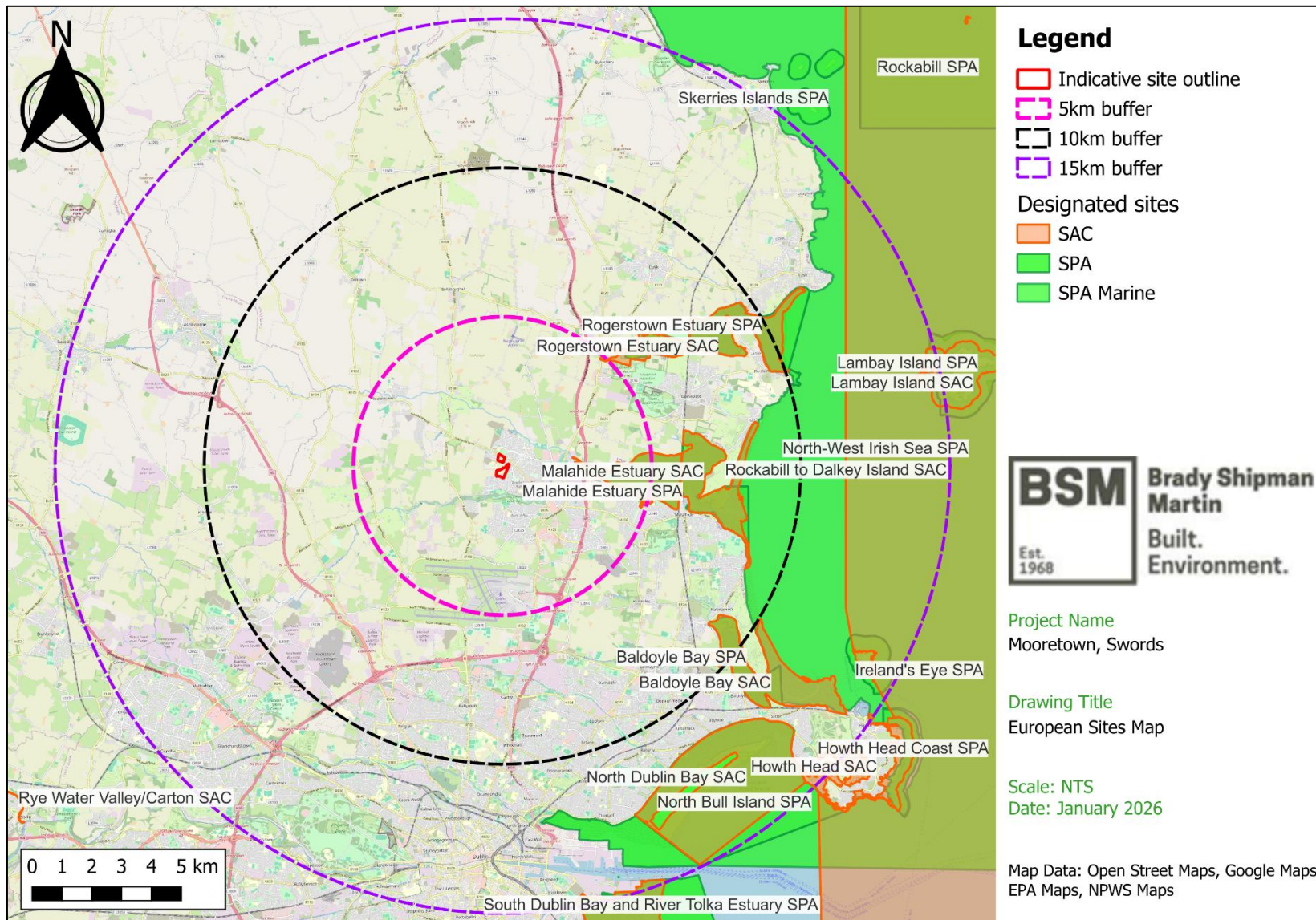


Figure 4-1 European sites within zone of influence of the proposed development at Mooretown. 10, 15 and 20km radii are shown for context scale.

4.2.2 Other designated areas (other than European sites)

Designated Sites other than European sites (i.e. Proposed Natural Heritage Areas (pNHA) and designated Natural Heritage Areas (NHA)) are included in this assessment in order to address their potential to act as supporting sites for the European sites. The NHAs and pNHAs within the Zone of Influence include:

- Natural Heritage Areas (NHA):
 - Skerries Islands NHA (site code 001218), c. 15.2km to the north-east.
- Proposed Natural Heritage Areas (pNHA):
 - Malahide Estuary (site code 000205), c. 2.2 km to the east.
 - Feltrim Hill pNHA (site code 001208) c. 4.2km to the south-east.
 - Rogerstown Estuary pNHA (site code 000208), c. 4.7km to the north-east.
 - Santry Demesne pNHA (site code 000178), c.6.5km to the south.
 - Sluice River Marsh pNHA (site code 001763) c. 7.5km to the south-east.
 - Portraine Shore pNHA (site code 001215), c. 8.5km to the north-east.
 - Baldoyle Bay pNHA (site code 000199), c. 8.7km to the south-east.
 - Royal Canal pNHA (site code 002103), c. 11.1km to the south-west.
 - North Dublin Bay pNHA (site code 000206), c. 11.5km to the south-east.
 - Bog of the Ring pNHA (site code 001204), c. 11.8km to the north.
 - Knock Lane pNHA (site code 001203), c. 12.8km to the north.
 - Ireland's Eye pNHA (site code 000203), c. 13.2km to the south-east.
 - Grand Canal pNHA (site code 002104), c. 13.6km to the south.
 - Lambay Island pNHA (site code 000204), c. 14km to the north-east.
 - Howth Head pNHA (site code 000202), c. 14.5km to the south-east.
 - Loughshinny Coast pNHA (site code 002000), c. 14.5km to the north-east.
 - South Dublin Bay pNHA (site code 000210), c. 14.8km 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.

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

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

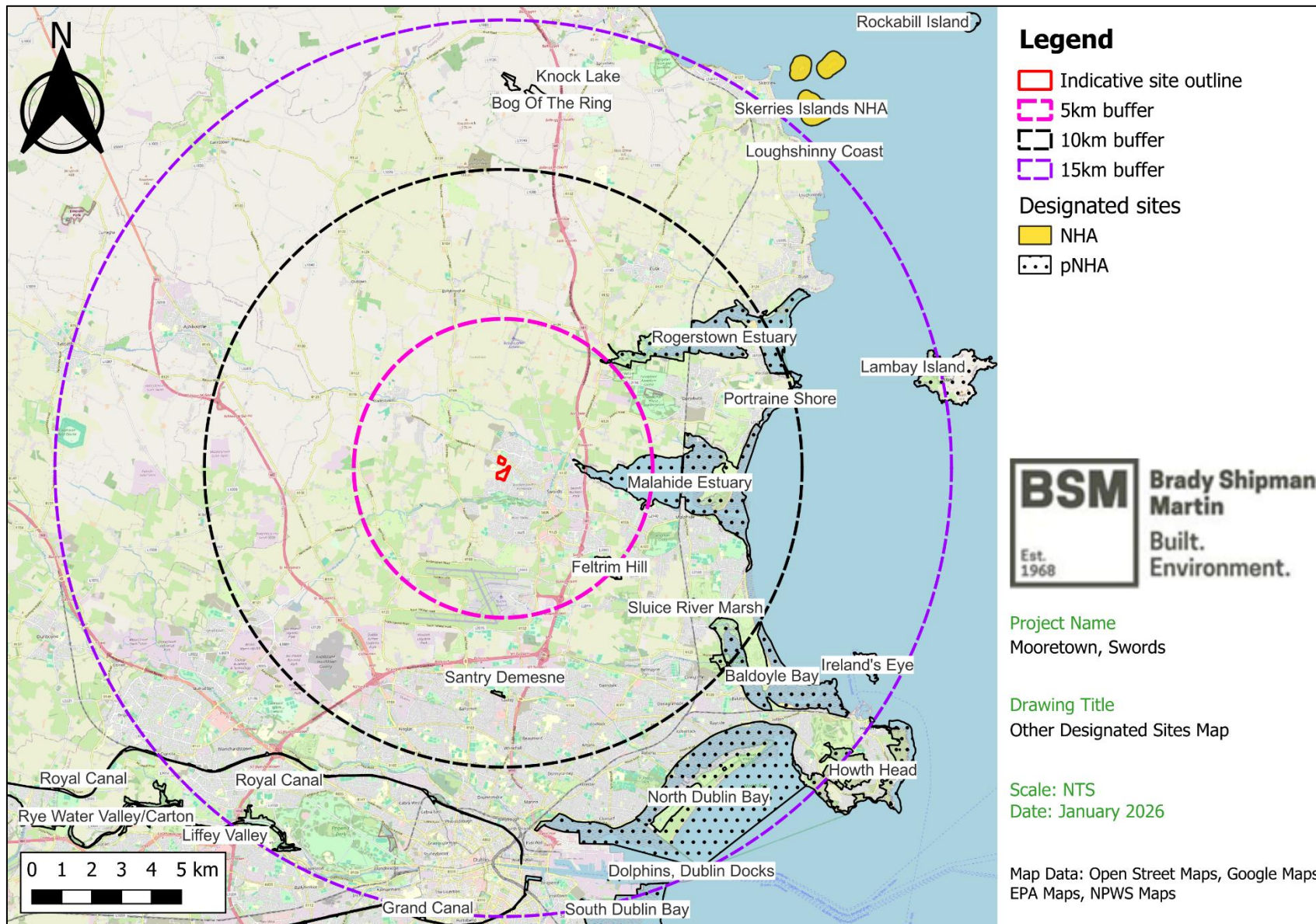


Figure 4-2 NHA and pNHA sites within zone of influence of the proposed development at Mooretown. 10, 15 and 20km radii are shown for context scale.

4.2.3 Watercourses, and pathways to European sites

A review of the Environmental Protection Agency (EPA) web-tool indicates that the Newtown 08 stream (EPA Code: IE_EA_08B020800) flows in a west to east direction through the site before turning north and flowing through Oldtown to merge into the Broadmeadow River c. 1km to the north of the proposed site. The Broadmeadow 08 River (EPA Code: IE_EA_08B020800) flows west to east and discharges downstream into the Malahide Estuary.

The proposed development site is located within the Nanny-Delvin catchment (08), Broadmeadow (SC_010) sub-catchment and Broadmeadow_040 river sub-basin.

As per the WFD 2019-2024 status, the Newtown Stream is of 'Poor' status and is 'At risk' for failing to meet its Water Framework Directive (WFD) objectives by 2027. As per the WFD 2016-2021 status, the Broadmeadow Water transitional water (IE_EA_060_0100) is of 'Moderate' status and 'At risk'.

The proposed development therefore has an indirect hydrological connection to the Broadmeadow River waterbody, via a network of on-site and adjacent drainage ditches and minor streams.

There is therefore a potential (albeit unlikely) surface water link between the proposed development site and the Natura 2000 Sites in the Malahide Bay and North-western Irish Sea (i.e. Malahide Estuary SAC & SPA and North West Irish Sea SPA). Refer to **Figure 4.3**, and to Section 5 for further details.

In addition to the drainage ditches and river waterbodies in the vicinity, a locally significant spring-fed feature, St Cronan's Well (Record of Monuments and Places Code: DU011-018), is located in the south-eastern corner of the southern part of the subject site. The well represents a point of groundwater emergence at surface and forms part of the local hydrological environment and cultural landscape. While St Cronan's Well does not form part of the mapped EPA river network and does not provide surface water flow to downstream watercourses, it represents a sensitive local water feature whose hydrological regime is influenced by shallow groundwater conditions rather than surface runoff processes.

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

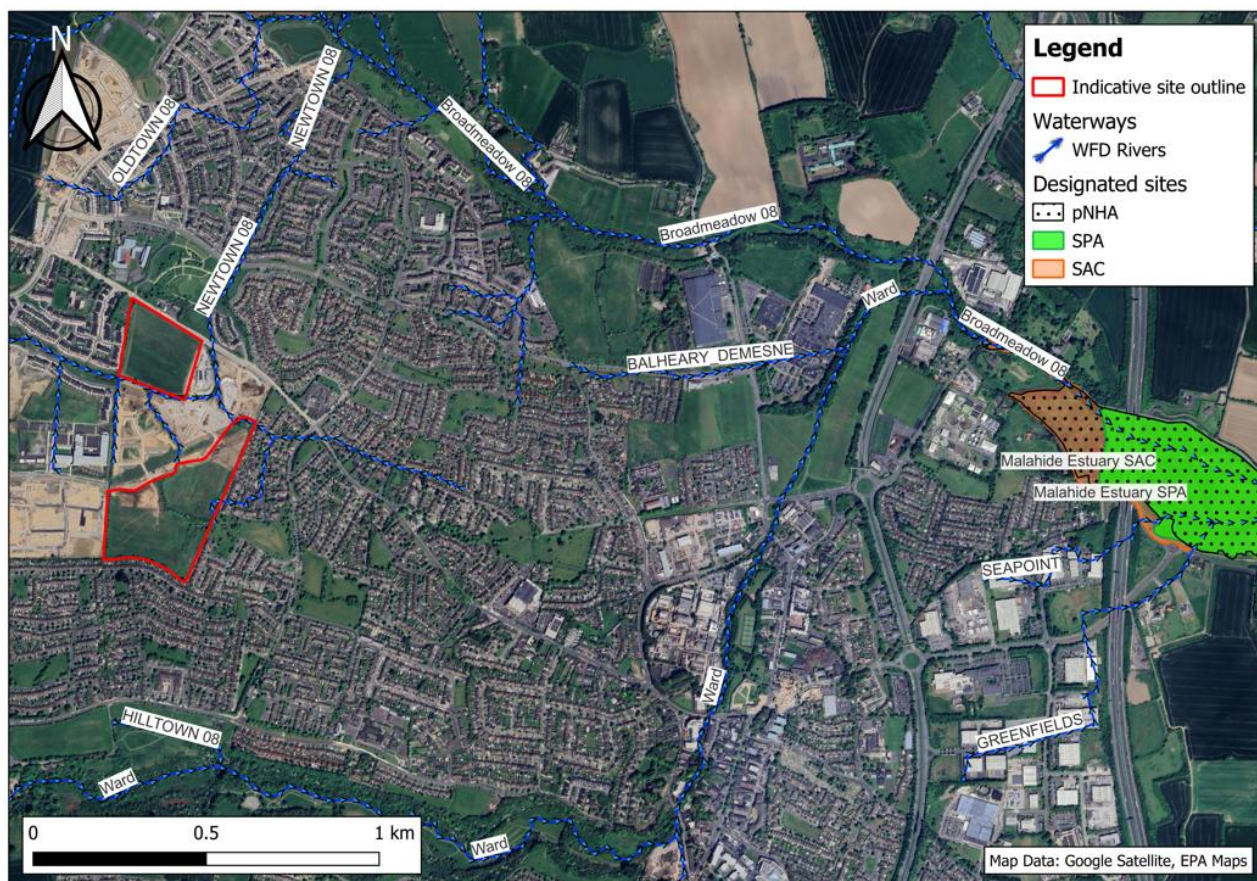


Figure 4-3 EPA waterbodies in the proximity of the proposed development at Mooretown.

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

5.1 European sites and habitats with links to European sites

The subject site comprises former agricultural land, now unmanaged. The fields are separated from each other by steep-sided, narrow ditches, heavily vegetated with scrub and hedgerows/tree lines with associated ditches (including the Newtown Stream). All ditches on the site flow north, ultimately to the Broadmeadow River.

The hedges and groups are made up of a mixture of native mostly tree species, including ash, hawthorn, elder, blackthorn, wild cherry, and elm. Vegetation growing along the field boundaries and ditches comprises a mix of hawthorn, elder and blackthorn, heavily overgrown with bramble. The ash trees show signs of ash dieback disease and Dutch elm disease is also prevalent in the elm trees at the site.

There is a small area of rank grassland in the northeastern corner of the subject site which appears not to have been farmed recently. This area also contains some areas of hard standing and bonfires appear to have lit in this location in the recent past.

The proposed development site 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 and none were recorded during the site visits carried out.

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*) are known to be present at the proposed development site.

No rare habitats or habitats of significant ecological value (i.e. International or National) are present at the site.

A total of 31 bird species were recorded on the lands during the surveys undertaken between November 2025 and March 2026). These are all common and widespread bird species of Ireland. They include two red-listed and six amber-listed species. (Gilbert *et al.* 2021). The red listed species were snipe and meadow pipit. A maximum of just two snipe was flushed during a single visit with single birds flushed on other occasions. A small flock of five wintering meadow pipit was detected during one visit while one to three individuals were detected on other occasions. The six amber listed species were mallard, herring gull, skylark, starling, house sparrow and Llinnet. A single pair of mallard were seen in flight over the lands on just one occasion. Herring gulls were seen infrequently and only in flight over the lands. A single skylark was seen on one occasion only in the southwestern area of the site.

A total of 28 bird species were recorded on the site during the surveys undertaken in April and May 2026. These are all common and widespread bird species of Ireland. They include one red-listed species (meadow pipit) and six amber-listed species (herring gull, barn swallow, house martin, starling, house sparrow and linnet). A total of 21 additional green listed species were also detected on the lands, most of which were observed on several occasions.

Just one waterbird species was recorded on the lands, that species was herring gull. Herring gull was observed foraging on top of the spoil heaps on one occasion when six birds were present. Herring gull were also seen flying over the lands frequently. Despite the presence of very small numbers of herring gulls, the subject site is of no significance for the species. While herring gull is listed as an SCI species in the North-West Irish Sea SPA, located some 7.6km distant, only very small numbers of birds were recorded.

The total of six herring gulls recorded during the winter bird surveys equates to, at most, only 0.058% of the 1% international population⁴ of the species (the 1% figure is estimated at 10,200 birds) this figure is negligible in the context of the importance of Irish coastal sites for herring gulls.

No other SCI species, such as lapwing, golden plover or oystercatcher were recorded on site.

There is no habitat on the site suitable for use, even on a very occasional basis, by any overwintering birds, such as pale-bellied Brent goose, or any other protected bird species listed as a Special Conservation Interest (SCI) in any European site within the Zone of Influence.

The mature hedges and tree lines that run through the site are of value for commuting and foraging bats (species protected under Article 12 of the Habitats Directive), however they contain few features suitable for use by roosting bats. No evidence of otter (also protected under Article 12 of the Habitats Directive) was recorded.

None of the habitats or features present on the site are Qualifying Interests/Special Conservation Interests in any European site within the Zone of Influence and none of these Qualifying Interests/Special Conservation Interests 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.

⁴ References to international populations of birds are after Nagy, S and Lagendoen, T (2021) [AEWA Report on the Conservation Status of Migratory Waterbirds in the Agreement Area – 8th Edition](#).

Overall the site of the proposed development site is of **Local (Higher Value) 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* (NRA/TII, 2009 (Rev. 2)).

5.1.1 Potential impacts during construction

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. The main contaminants arising from construction activities may include suspended solids, hydrocarbons and concrete/cement products. If not properly managed, such pollutants could pose a temporary risk to surface water quality in the local surface water network during construction.

Polluted surface water will not be emitted directly to any surface water body. There is a possibility that contaminated surface water from the site could enter the local ditches/surface water network, thereby creating an indirect hydrological pathway linking the proposed development site with European Sites downstream (i.e. Malahide Estuary SAC and SPA).

The **Hydrological and Hydrogeological Qualitative Risk Assessment report (HHQRA)** prepared by AWN Consulting (Trinity Consultants) and submitted under separate cover, contains a conceptual site model (CSM) that was prepared for the proposed development. The HHQRA is appended to this AA Screening Report (see **Appendix IV**).

As set out in the HHQRA, the potential for off-site migration of contaminants during the construction phase is considered inherently low, primarily due to the site's underlying geological conditions and the strict control of construction-phase water management.

All construction-phase water (including rainfall runoff, shallow groundwater seepage or any localised dewatering) will be required to pass through settlement or treatment measures prior to any authorised off-site discharge. This substantially reduces the likelihood of contaminant transport via surface water pathways.

Vertical migration of contaminants to the underlying calcareous shale and limestone conglomerate bedrock is minimised by the presence of a thick layer (approximately 6.6–8.7 m) of stiff to very stiff cohesive clay till across the site. Ground investigation works (Site Investigations Ltd., April 2024) confirm that these glacial tills are of very low permeability, providing substantial natural protection to the underlying aquifer. Consequently, the bedrock aquifer is not considered a sensitive receptor during the construction phase.

In addition, a localised hydrogeological feature, St Cronan's Well (RMP DU011-018), is present within the south-eastern corner of the southern parcel. The well is fed by shallow, perched and discontinuous groundwater seepage within the overlying clay tills rather than by deep bedrock groundwater. Construction activities will not involve sustained dewatering, abstraction, deep excavation or drainage interception capable of altering the groundwater regime supporting the spring. Any groundwater encountered during construction will be temporary, localised and rainfall-related, managed in accordance with the Construction and Environmental Management Plan (CEMP). As such, no credible construction-phase pathway exists whereby contaminants could migrate to St Cronan's Well.

There is, however, an indirect hydrological linkage between surface water runoff from the Proposed Development and the Broadmeadow 08 (Broadmeadow River) approximately 1.4 km downstream / 1.1 km north of the northern parcel. This pathway occurs exclusively via the engineered surface water drainage network, which conveys attenuated flows beneath Rathbeale Road before reaching the Broadmeadow system. Any construction-phase runoff entering this network will first pass through settlement systems and temporary SuDS measures, ensuring filtration and sediment removal prior to controlled discharge.

Based on the CSM, the plausible Source-Pathway-Receptor (S-P-R) linkages have been assessed assuming an absence of any measures intended to avoid or reduce harmful effects of the proposed development (i.e. mitigation measures) in place at the proposed development site. Table 3.1 of the HHQRA (*Pollutant Linkage Assessment (without control measures)*) summarises the plausible pollutant links considered as part of the assessment (this Table is reproduced as **Table 5.1** below – and deals with both the construction and operational phases).

Table 5.1 - Pollutant Linkage Assessment (without control measures) (Table extracted from the HHQRA)

Source	Pathways	Receptors considered	Risk of Impact
Construction Impacts			
Unmitigated leak from an oil tank to ground/ unmitigated leak from construction vehicle (1,000 litres worst case scenario). Discharge to ground of runoff water with: ▶ High pH from cement processes i.e. concrete washout areas. ▶ Hydrocarbons from construction vehicles. ▶ Run-off containing a high concentration of suspended solids. Accidental discharge of wastewater from temporary welfare facilities (if required). Temporary connection to the public foul sewer (subject to licence), to accommodate vehicle washdown water following pollution control and attenuation measures. Surface water run-off discharged to the existing surface water sewer network, following treatment (settlement tanks/ponds, Class 1 Petrol Interceptors and spill control measures).	Vertical migration through contaminated overburden to underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones'. Groundwater flow is generally restricted to isolated fractures, meaning that connectivity, recharge potential, and the potential for contaminant migration are all low and confined to very local scales, reducing potential for off-site lateral migration. The GSI (2026) mapping indicates that the Proposed Development is underlain by 'Moderate' (M) groundwater vulnerability, denoting depths of c. 3-10 m within Carboniferous Limestone till. Excavations will temporarily increase the aquifer vulnerability. According to site investigations carried out trial pits and boreholes advanced to between 6.70m BGL and 8.80m BGL, and bedrock was not encountered at any location, indicating that the rockhead lies deeper than previously indicated by GSI mapping.	Underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones'. Underlying Swords Groundwater Body (GWB) (European Code: IE_EA_G_011). Broadmeadow_040 WFD River Waterbody (European Code: IE_EA_08B020800), including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries. Broadmeadow Water transitional waterbody (European Code: IE_EA_060_0100), located c. 4 km downstream / c. 2.6 km east of the Proposed Development. Malahide Bay coastal waterbody (European Code: IE_EA_060_0000), located c. 7.5km downstream / c. 5.7 km east of the Proposed Development. Malahide Estuary SPA (Site Code: 004025). Malahide Estuary SAC (000205).	No likely impact on the WFD status of the underlying 'PI - Poor Aquifer - Bedrock, which is generally unproductive except for local zones', or the underlying Swords Groundwater Body (GWB) (European Code: IE_EA_G_011), due to low potential loading, shallow depth of excavations (c. 3.93 m BGL), natural attenuation within the underlying subsoils (cohesive glacial tills; SIL, April 2024), depth to bedrock > c. 6.7-8.8m BGL (SIL, April 2024) and discrete nature of fracturing reducing off site migration.

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Source	Pathways	Receptors considered	Risk of Impact
Temporary connection to the public foul sewer (subject to licence), to accommodate vehicle washdown water following pollution control and attenuation measures.	Indirect pathway to hydrological environment (Broadmeadow Estuary transitional waterbody) via temporary connection to the public foul sewer (subject to licence) which receives treatment at Swords WWTP; to accommodate vehicle washdown water following pollution control and attenuation measures.	Malahide Estuary Natural Heritage Area (NHA; Site Code: 000205).	No likely impacts on the WFD status of WFD surface waterbodies (Broadmeadow_040 WFD River Waterbody, Broadmeadow Water transitional waterbody and Malahide Bay coastal waterbody), due to low potential loading, natural attenuation within the underlying subsoils (cohesive glacial tills; SIL, April 2024), high level of dilution in the surface water sewer and hydrological environment (including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries), tidal flushing nature of Broadmeadow Water transitional waterbody and Malahide Bay coastal waterbody, and proposed temporary connection to the public foul sewer (subject to licence) receiving full treatment at Swords WWTP prior to discharge to Broadmeadow Estuary transitional waterbody.
Operational Impacts			

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Source	Pathways	Receptors considered	Risk of Impact
Discharge to ground of hydrocarbons from roads, car parking, and hardstanding areas (70 litres worst case scenario). Discharge of foul water to Swords Wastewater Treatment Plant (WWTP; Active Licence Number: D0024-01). Discharge of surface water to the receiving surface water sewer that convey flows to the Broadmeadow 08 river (Broadmeadow_040 WFD river waterbody).	Indirect pathway to hydrological environment via proposed surface water drainage system that discharges to the surface water sewer network which conveys flows to the Broadmeadow 08 river; SuDS features include Permeable Paving, Rain Gardens / Bioretention Swales, Detention Basins & Underground Storage and Class 1 petrol interceptors. (Designed in accordance with full Sustainable Drainage Systems; SuDS), Indirect pathway to hydrological environment via connection to the public foul sewer (subject to licence) which receives treatment at Swords WWTP, prior to outfall at Broadmeadow Estuary transitional waterbody.	Broadmeadow_040 WFD River Waterbody (European Code: IE_EA_08B020800), including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries. Broadmeadow Water transitional waterbody (European Code: IE_EA_060_0100), located c. 4 km downstream / c. 2.6 km east of the Proposed Development. Malahide Bay coastal waterbody (European Code: IE_EA_060_0000), located c. 7.5km downstream / c. 5.7 km east of the Proposed Development. Malahide Estuary SPA (Site Code: 004025). Malahide Estuary SAC (000205). Malahide Estuary Natural Heritage Area (NHA; Site Code: 000205).	No perceptible risk due to the implementation of the design measures which includes SuDS and the use of interceptors along the drainage system. Furthermore, the extent of loading of potential contaminant, distance between the source and the receptors along with significant dilution in the drainage network will ensure any released hydrocarbons and other contaminants are at background levels (i.e., with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019).

Source	Pathways	Receptors considered	Risk of Impact
			No perceptible risk to the hydrological environment following treatment in the EPA licenced Swords Wastewater Treatment Plant (WWTP; Active Licence Number: D0024-01). This foul loading will not adversely impact the operational capacity of Swords WWTP nor downstream surface water environments. According to the Swords Waste Water Treatment Plant (WWTP) Annual Environmental Report (AER, 2024), the plant's reported peak hydraulic capacity is 60,750 m³/day (703.125 l/s). The Proposed Development's peak foul effluent discharge of 10.81 l/s represents approximately 1.54% of this capacity. All foul water conveyed to Swords WWTP will receive full treatment prior to discharge, ensuring no operational-phase pathway/impacts to the hydrological or hydrogeological environment.

5.1.1.1 HHQRA - Conclusions

As set out in the HHQRA prepared by AWN Consulting, a conceptual site model (CSM) has been developed based on a detailed desk-based review of the proposed development and its surrounding hydrological and hydrogeological setting. The assessment has evaluated all plausible Source–Pathway–Receptor (SPR) linkages on a worst-case basis, explicitly excluding any design or mitigation measures that would ordinarily prevent or reduce pollutant migration. This approach ensures a robust and conservative evaluation of potential hydrological and hydrogeological risks.

During both the construction and operational phases, the proposed development maintains an indirect hydrological connection to downstream receiving waters via the stormwater drainage system and local hydrological environment. Surface water discharged from the proposed development will ultimately flow toward the Broadmeadow 08 river (Broadmeadow_040 WFD river waterbody), before entering the Broadmeadow Water transitional waterbody (c. 4 km downstream) and Malahide Bay coastal waterbody (c. 7.5 km downstream).

A separate indirect pathway also exists via the proposed foul-water drainage network, which conveys wastewater to Swords WWTP for full treatment prior to discharge to the Broadmeadow Water transitional waterbody. The future development's peak foul discharge of 10.81 l/s represents only 1.54% of the WWTP's peak hydraulic capacity, providing substantial assurance that it will not influence downstream water quality or the Water Framework Directive (WFD) status of receiving water bodies.

Even when disregarding all onsite design measures such as SuDS features, attenuation storage and Class 1 petrol interceptors, the assessment concludes that any potential contaminant load arising from construction or operational activities would be imperceptible at the point of discharge and would undergo significant dilution, mixing and tidal flushing within the Broadmeadow_040 WFD river waterbody, Broadmeadow Water transitional waterbody, and Malahide Bay coastal waterbody. These hydrodynamic characteristics ensure that any worst-case releases of hydrocarbons, suspended solids or other construction-related contaminants would rapidly attenuate to background levels.

The site's geological profile provides additional natural protection. The deep layer (6.6–8.7 m) of stiff to very stiff glacial till (SIL, April 2024) greatly restricts vertical contaminant migration, thereby protecting the underlying 'PI – Poor Aquifer – Bedrock which is generally unproductive except for local zones' and the Swords Groundwater Body (IE_EA_G_011). As a result, no likely hydrogeological pathway exists for contaminants to reach groundwater in quantities that could influence groundwater quality or status.

The assessment also considered the presence of St Cronan's Well (RMP DU011-018). While the feature was acknowledged due to its local cultural significance, it is not considered a receptor for the purposes of the SPR assessment. The well is a naturally occurring shallow spring, supported by perched and discontinuous groundwater within low-permeability glacial tills, and is not hydraulically connected to site drainage pathways or deeper groundwater systems. Given the absence of sustained dewatering, groundwater abstraction, infiltration drainage or credible contaminant pathways, no scenario exists under which construction or operational activities could adversely affect the well.

Plausible cumulative scenarios, including a combined hydrocarbon release and sediment-laden runoff during construction, were also evaluated. Due to the low contaminant loading, on-site attenuation within the proposed drainage network, and the significant dilution capacity of downstream surface waters, no perceptible impact on water quality along the hydrological pathway would arise. Furthermore, the Proposed Development will not increase stormwater discharge above existing greenfield conditions, ensuring that no additional hydrological loading or overflow impacts are introduced into the downstream catchment.

Finally, and in line with good practice, appropriate and effective mitigation measures will be included in the construction design, management of construction programme and during the operational phase of the Proposed Development. These include the implementation of a Construction Environmental Management Plan (CEMP), strict pollution-prevention measures, controlled refuelling practices, and an extensive SuDS drainage design incorporating interception storage, filtration, attenuation and hydrocarbon control. While these measures will further reduce the already-low risk of pollutant migration, the conclusions of this assessment do not rely on them.

Overall, the assessment concludes that there are no significant hydrological or hydrogeological pollutant linkages associated with the construction or operation of the Proposed Development which could result in a water quality impact which could alter the habitat requirements of the Natura 2000 sites located within the Broadmeadow Water transitional waterbody or Malahide Bay coastal waterbody.

No plausible scenario exists under which the proposed development would give rise to deterioration in groundwater or surface-water quality, nor would it alter the hydrological or hydrogeological WFD status of the Broadmeadow_040 WFD river waterbody, Broadmeadow Water transitional waterbody, Malahide Bay coastal

waterbody or the underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones' and Swords groundwater body (GWB).

Finally, and in line with good practice, appropriate and effective mitigation measures will be included in the construction design, management of construction programme and during the operational phase of the proposed development. With regard to the construction phase, adequate mitigation measures will be incorporated in the Construction Environmental Management Plan (CEMP). These specific measures will provide further protection to the receiving soil and water environments. However, the protection of European sites is in no way reliant on these measures and they have not been taken into account in this assessment.

There is no possibility of any other potential direct, indirect or secondary impacts on any European site during the construction or operational phases of the proposed development. 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 proposed development, and no interference with the key relationships that define the structure or function of any European site.

Consequently, it is certain that there is no potential for changes to water-dependent habitat requirements arising from the proposed development – this conclusion does not take any mitigation measures into account.

During the construction phase, typical environmental effects associated with construction works of this nature and scale are predicted, including elevated levels of noise, emissions of dust, direct and indirect greenhouse gas emissions, etc. These effects will be short-term in duration, at most, temporary and reversible. There will also be environmental risks associated with the presence of potential pollutants typically stored and used on-site (e.g. hydrocarbons, solvents, cementitious materials).

There is no possibility of any other potential direct, indirect or secondary impacts on any European site during the construction phase. 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 by virtue of distance.

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 proposed development, and no interference with the key relationships that define the structure or function of any European site.

Significant construction-related effects as a result of the proposed development, on European sites or otherwise, can therefore be excluded.

5.1.2 Potential impacts during operation

The site is zoned for residential development. During the operational phase, typical environmental effects associated with the presence and operation of a residential development are predicted, including water consumption, surface and foul water loading to the municipal network, additional traffic volumes and direct and indirect greenhouse gas emissions. Operational phase effects are expected to be permanent in duration.

As set out in the HHQRA, during the operational phase, potential contaminant pathways are limited to controlled surface water discharges from the Proposed Development and the fully engineered foul drainage network.

Surface water runoff generated during operation will be managed through a SuDS-led, fully separated stormwater drainage system. Runoff will pass through multiple treatment stages—including permeable paving, bioretention systems, swales and detention storage—providing filtration, settlement and biodegradation prior to controlled discharge at QBAR greenfield-equivalent rates. This ensures that any hydrocarbons or suspended solids associated with residential land use cannot migrate rapidly or in untreated form into the receiving hydrological or hydrogeological environment.

There remains an indirect hydrological pathway between operational surface water runoff and the Broadmeadow 08 river c. 1.4 km downstream, which subsequently discharges to the Broadmeadow Water transitional waterbody (c. 4 km downstream) and to Malahide Bay coastal waterbody a further 3.5 km downstream. However, the combination of source control, treatment and attenuation within the drainage system ensures that operational-phase runoff poses a very low pollution risk to downstream surface water receptors.

The underlying bedrock aquifer remains hydraulically protected by the thick, low-permeability glacial till and is not considered a sensitive receptor during the operational phase. No groundwater abstraction, infiltration drainage or interception measures form part of the operational design.

With respect to St Cronan's Well, the operational drainage strategy does not introduce any pathway capable of altering shallow groundwater levels or flow directions supporting the spring. Untreated runoff is not permitted to infiltrate in the vicinity of the well, and local groundwater recharge patterns remain broadly unchanged. Accordingly, no operational pathway exists whereby contaminants could migrate to, or adversely affect, St Cronan's Well.

There is no direct pathway between foul sewage generated within the Proposed Development and any receiving surface water or groundwater body. The foul sewer network is fully separated from the stormwater system and conveys effluent via the Phase 1 pump station (Planning Ref. LADP/002/24) to the public wastewater network, ultimately discharging to Swords Wastewater Treatment Plant (WWTP) for full treatment. Treated effluent only is discharged to the Broadmeadow transitional waterbody in accordance with the WWTP's EPA licence (D0024-01). Given that the additional loading from the Proposed Development represents approximately 1.54 % of the WWTP's peak hydraulic capacity, and that the plant operates in compliance with its licence, no plausible pathway exists for untreated or harmful effluent to reach ecologically sensitive receptors.

As set out in the Infrastructure Report prepared by AKM Design Group (2026), surface water runoff from the development will be managed using the appropriate Sustainable Urban Drainage Systems (SuDS) techniques as required in the Fingal Development Plan 2023-2029.

The proposed development will not generate any additional uncontrolled stormwater runoff compared with the existing greenfield conditions, as all surface-water discharges will be restricted to QBAR (greenfield equivalent) for each catchment through the use of Hydro-Brake controls and the proposed SuDS-based attenuation systems. The surface water drainage network has been designed to fully attenuate runoff up to the 1-in-100-year storm event including a 20% climate-change allowance, ensuring that outflows do not exceed greenfield discharge rates and therefore do not contribute to downstream flood risk or increased hydraulic loading of the receiving system.

Even in the total absence of any attenuation or SuDS measures there would be no impacts on any European sites. The significant distances to European sites and the natural characteristics of the receiving waters ensure rapid mixing of water such that there is no possibility of any appreciable effect on water quality in European sites in any event.

Significant effects related to surface water management or flooding, arising as a result of the operation of the proposed development, on European sites or otherwise, can therefore be excluded.

As set out in Infrastructure Report prepared by AKM Design Group (2026), the peak foul effluent discharge from the proposed development is 10.81 l/s, which represents approximately 1.54% of the available peak hydraulic capacity at Swords Wastewater Treatment Plant (WWTP), which operates at 60,750 m³/day as reported in the Swords WWTP AER (2024). This level of loading is considered negligible in hydraulic terms and will not adversely affect the operational performance of Swords WWTP or the receiving waters in the Nanny–Delvin catchment.

Accordingly, with surface water restricted to greenfield rates and foul discharge representing a small fraction of the available WWTP capacity, the proposed development will have no measurable impact on downstream water quality, flood risk, or wastewater treatment operations.

The foul drainage network will be divided into 2no. catchments: The 53 units in the northern cell of the proposed development will connect via gravity to the foul pump station currently under construction as part of the Phase 1 works, permitted and under construction. This pump station will discharge to the gravity foul network within Phase 1. Capacity has been built into the pump station for these additional units. The southern part of the proposed development will connect via gravity to the Phase 1 pipe network which connects to the public network west of the site in the Cronan’s Well estate. A pre-Connection Enquiry was made to Uisce Éireann and a Confirmation of Feasibility (CoF) was issued on Aug 26 2025, with a Statement of Design Acceptance (SoDA) on issued on 16 March 2026 Ref CDS25003155. The Uisce Éireann correspondence is attached as an appendix to the Infrastructure Report

Significant effects related to foul water management, arising as a result of the operation of the proposed development, on European sites or otherwise, can therefore be excluded.

For the reasons set out above, no pNHAs have the potential to be affected by the proposed development in a manner that could directly or indirectly affect any European Sites or their QIs / SCIs, taking into account their Conservation Objectives.

There is no possibility of any other potential direct, indirect or secondary impacts on any European site once the proposed development 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 proposed 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 proposed development, on European sites or otherwise, can therefore be excluded.

A detailed discussion of the potential impacts of the proposed development on individual European sites within the potential Zone of Influence is presented in **Table 5.2**, below.

Table 5.2 Potential impacts on European sites in the potential Zone of Influence

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Malahide Estuary SAC (site code 000205), c. 2.1km to the east	■ 1140 Mudflats and sandflats not covered by seawater at low tide ■ 1310 <i>Salicornia</i> and other annuals colonising mud and sand ■ 1320 <i>Spartina</i> swards (<i>Spartinion maritimae</i>) ■ 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) ■ 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) ■ 2120 Shifting dunnes along the shoreline with <i>Ammophila arenaria</i> (white dunes) ■ 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* <i>*indicates a priority habitat under the Habitats Directive</i> 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.	No significant effects on water quality, and therefore on the site's QIs, are predicted. Surface/ground water arising during the construction and operation of the proposed development 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 Malahide Estuary, via the Broadmeadow River. There will be no 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 event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality locally, this would not be perceptible in Malahide Estuary SAC – as confirmed and explained in Section 5.1. This is due to the significant separation between the proposed development site and the European site – the proposed development site is c. 2.1km (straight line distance) from the SAC and any pollution entering any watercourse during construction would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the sea any pollutants would be even further diluted and dissipated in the marine environment. 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

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Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		No operational impacts on this European site will occur as a result of the proposed development.	
Rogerstown Estuary SAC (site codes 000208), c. 4.7km to the north-east	■ 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 (<i>Glauco-Puccinellietalia maritima</i>) ■ 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) ■ 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (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.	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is almost 5km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No
Baldoyle Bay SAC (site code 000199), c. 8.6km to the south-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 (<i>Glauco-Puccinellietalia maritima</i>)	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is almost 9km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted.	No

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 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 as a result of the proposed development.	
Rockabill to Dalkey Island SAC (site code 003000), c. 11.4km to the east	1170 Reefs 1351 Harbour Porpoise (<i>Phocoena phocoena</i>) 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.	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is over 11km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No
North Dublin Bay SAC (site code 000206), c. 11.4km south-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 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) 1395 Petalwort (<i>Petalophyllum ralfsii</i>) 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 2110 Embryonic shifting dunes 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes)	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is over 11km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	■ 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* ■ 2190 Humid dune slacks <i>*indicates a priority habitat under the Habitats Directive</i> 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.		
Ireland's Eye SAC (site code 002193), c. 13.2km to the south-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 selected.	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is over 13km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No
Lambay Island SAC (site code 000204), c. 14km to the north-east	■ 1170 Reefs ■ 1230 Vegetated sea cliffs of the Atlantic and Baltic coasts ■ Harbour porpoise (<i>Phocoena phocoena</i>) ■ 1364 Grey seal (<i>Halichoerus grypus</i>) ■ 1365 Harbour seal (<i>Phoca vitulina</i>) According to this SAC's site Conservation Objectives document (Version 2, dated 17 December 2024), for each of the listed QIs, the Conservation Objective is	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is approximately 14km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	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.		
Howth Head SAC (site code 000202), c. 14.2km to the south-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.	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is over 14km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No
South Dublin Bay SAC (site code 000210), c. 14.7km to the south-east	■ [1140] Mudflats and sandflats not covered by seawater at low tide ■ [1210] Annual vegetation of drift lines ■ [1310] <i>Salicornia</i> 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.	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is almost 15km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	No
Rye Water Valley/Cartron SAC (site code 001398), c. 19.8km to the south-west	■ 7220 Petrifying springs with tufa formation (Cratoneurion) ■ 1016 Desmoulin's whorl snail (<i>Vertigo moulinsiana</i>) ■ 1014 Narrow-mouthed whorl snail (<i>Vertigo angustior</i>)	There is no direct hydrological link or any other pathway between the proposed development at Mooretown (Phase 2), Swords and this SAC. It is almost 20km distant and is unconnected via surface water or any other pathway. No significant effects on water quality, and therefore on the site's QIs, are predicted.	No

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APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	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.	Furthermore, there will be no loss of species, fragmentation or disturbance to the QIs of this SAC as a result of the proposed development.	
Malahide Estuary SPA (site code 004025), c. 2.5km to the north-east	■ A005 Great Crested Grebe (<i>Podiceps cristatus</i>) ■ A046 Brent Goose (<i>Branta bernicla hrota</i>) ■ A048 Shelduck (<i>Tadorna tadorna</i>) ■ A054 Pintail (<i>Anas acuta</i>) ■ A067 Goldeneye (<i>Bucephala clangula</i>) ■ A069 Red-breasted (<i>Merganser Mergus serrator</i>) ■ A130 Oystercatcher (<i>Haematopus ostralegus</i>) ■ A140 Golden Plover (<i>Pluvialis apricaria</i>) ■ A141 Grey Plover (<i>Pluvialis squatarola</i>) ■ A143 Knot (<i>Calidris canutus</i>) ■ A149 Dunlin (<i>Calidris alpina alpina</i>) ■ A156 Black-tailed Godwit (<i>Limosa limosa</i>) ■ A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) ■ A162 Redshank (<i>Tringa tetanus</i>) ■ 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.	No significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the construction and operation of the proposed development 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 Malahide Estuary, via the Broadmeadow River. There will be no 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 event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality locally, this would not be perceptible in Malahide Estuary SPA – as confirmed and explained in Section 5.1. This is due to the significant separation between the proposed development site and the European site – the proposed development site is c. 2.5km (straight line distance) from the SPA and any pollution entering any watercourse during construction would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur.	No

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APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
		Upon reaching the sea any pollutants would be even further diluted and dissipated in the marine environment. 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.	
Rogerstown Estuary SPA (site code 004015), c. 5.3km to the north-east	- A043 Greylag Goose (<i>Anser anser</i>) - A046 Brent Goose (<i>Branta bernicla hrota</i>) - A048 Shelduck (<i>Tadorna tadorna</i>) - A056 Shoveler (<i>Anas clypeata</i>) - A130 Oystercatcher (<i>Haematopus ostralegus</i>) - A137 Ringed Plover (<i>Charadrius hiaticula</i>) - A141 Grey Plover (<i>Pluvialis squatarola</i>) - A143 Knot (<i>Calidris canutus</i>) - A149 Dunlin (<i>Calidris alpina alpina</i>) - A156 Black-tailed Godwit (<i>Limosa limosa</i>) - A162 Redshank (<i>Tringa tetanus</i>) - 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.	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is over 6km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	No
North-West Irish Sea SPA (site code 004236), c.	- A065 Common Scoter (<i>Melanitta nigra</i>) - A001 Red-throated Diver (<i>Gavia stellata</i>) - A003 Great Northern Diver (<i>Gavia immer</i>) - A009 Fulmar (<i>Fulmarus glacialis</i>)	No significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the construction and operation of the proposed development could contain pollutants (foul water, silt,	No

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Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
7.6km to the east	- A013 Manx Shearwater (<i>Puffinus puffinus</i>) - A018 Shag (<i>Phalacrocorax aristotelis</i>) - A017 Cormorant (<i>Phalacrocorax carbo</i>) - A177 Little Gull (<i>Larus minutus</i>) - A188 Kittiwake (<i>Rissa tridactyla</i>) - A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) - A182 Common Gull (<i>Larus canus</i>) - A183 Lesser Black-backed Gull (<i>Larus fuscus</i>) - A184 Herring Gull (<i>Larus argentatus</i>) - A187 Great Black-backed Gull (<i>Larus marinus</i>) - A195 Little Tern (<i>Sterna albifrons</i>) - A192 Roseate Tern (<i>Sterna dougallii</i>) - A193 Common Tern (<i>Sterna hirundo</i>) - A194 Arctic Tern (<i>Sterna paradisaea</i>) - A204 Puffin (<i>Fratercula arctica</i>) - A200 Razorbill (<i>Alca torda</i>) - A199 Guillemot (<i>Uria aalge</i>) According to this SPA's site Conservation Objectives document (Version 1 - dated 19 September 2023), for each of the listed SCIs, the Conservation Objective maintain or restore the favourable conservation condition of the species for which the SPA has been selected.	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 Malahide Estuary and onwards, via the Broadmeadow River. There will be no 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 event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality locally, this would not be perceptible in the North-West Irish Sea SPA – as confirmed and explained in Section 5.1. This is due to the significant separation between the proposed development site and the European site – the proposed development site is c. 7.5km (straight line distance) from the SPA and any pollution entering any watercourse during construction would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the sea any pollutants would be even further diluted and dissipated in the marine environment. 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.	
Baldoyle Bay SPA (site code 004016), c.	- A046 Brent Goose (<i>Branta bernicla hrota</i>) - A048 Shelduck (<i>Tadorna tadorna</i>) - A137 Ringed Plover (<i>Charadrius hiaticula</i>) - A140 Golden Plover (<i>Pluvialis apricaria</i>)	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is almost 9km distant and is unconnected via any pathway. No	No

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APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
8.6km to the south-east	- A141 Grey Plover (<i>Pluvialis squatarola</i>) - A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) - 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.	significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	
North Bull Island SPA (site code 004006), c. 11.2km to the south-east	- A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) - A048 Shelduck (<i>Tadorna tadorna</i>) - A052 Teal (<i>Anas crecca</i>) - A054 Pintail (<i>Anas acuta</i>) - A056 Shoveler (<i>Anas clypeata</i>) - A130 Oystercatcher (<i>Haematopus ostralegus</i>) - A140 Golden Plover (<i>Pluvialis apricaria</i>) - A141 Grey Plover (<i>Pluvialis squatarola</i>) - A143 Knot (<i>Calidris canutus</i>) - A144 Sanderling (<i>Calidris alba</i>) - A149 Dunlin (<i>Calidris alpina</i>) - A156 Black-tailed Godwit (<i>Limosa limosa</i>) - A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) - A160 Curlew (<i>Numenius arquata</i>) - A162 Redshank (<i>Tringa totanus</i>) - A169 Turnstone (<i>Arenaria interpres</i>) - A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) - A999] Wetland	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is over 11km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	No

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APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 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.		
South Dublin Bay and River Tolka Estuary SPA (site code 004024), c. 11.8km to the south-east	■ A144 Sanderling (<i>Calidris alba</i>) ■ A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) ■ A149 Dunlin (<i>Calidris alpina</i>) ■ A162 Redshank (<i>Tringa totanus</i>) ■ A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) ■ A143 Knot (<i>Calidris canutus</i>) ■ A192 Roseate Tern (<i>Sterna dougallii</i>) ■ A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) ■ A141 Grey Plover (<i>Pluvialis squatarola</i>) ■ A130 Oystercatcher (<i>Haematopus ostralegus</i>) ■ A194 Arctic Tern (<i>Sterna paradisaea</i>) ■ A193 Common Tern (<i>Sterna hirundo</i>) ■ A137 Ringed Plover (<i>Charadrius hiaticula</i>) ■ 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.	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is almost 12km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	No
Ireland's Eye SPA (site code 004117), c.	■ A017 Cormorant (<i>Phalacrocorax carbo</i>) ■ A184 Herring Gull (<i>Larus argentatus</i>) ■ A188 Kittiwake (<i>Rissa tridactyla</i>)	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is almost 13km distant and is unconnected via any pathway. No	No

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
12.8km to the south-east	- A199 Guillemot (<i>Uria aalge</i>) - A200 Razorbill (<i>Alca torda</i>) According to this SPA's Conservation Objectives document (Version 1, dated 12 March 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.	significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	
Lambay Island SPA (site code 004069), c. 13.8km to the north-east	- A043 Greylag Goose (<i>Anser anser</i>) - A200 Razorbill (<i>Alca torda</i>) - A184 Herring Gull (<i>Larus argentatus</i>) - A009 Fulmar (<i>Fulmarus glacialis</i>) - A204 Puffin (<i>Fratercula arctica</i>) - A183 Lesser Black-backed Gull (<i>Larus fuscus</i>) - A188 Kittiwake (<i>Rissa tridactyla</i>) - A199 Guillemot (<i>Uria aalge</i>) - A018 Shag (<i>Phalacrocorax aristotelis</i>) - A017 Cormorant (<i>Phalacrocorax carbo</i>) According to this SPA's Conservation Objectives document (Version 1, dated 19 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.	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is almost 14km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	No
Howth Head Coast SPA (site code 004113), c. 15.0km to the south-east	A188 Kittiwake (<i>Rissa tridactyla</i>) According to this SPA's Conservation Objectives document (Version 1, dated 29 October 2024), for the listed SCI, the Conservation Objective is to maintain or	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is approximately 15km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted.	No

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APPROPRIATE ASSESSMENT SCREENING REPORT

Site	Reasons for designation (information correct as of May 2026) (*denotes a priority habitat)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	
Skerries Island SPA (site code 004122), c. 15.2km to the north-east	■ A017 Cormorant (<i>Phalacrocorax carbo</i>) ■ A018 Shag (<i>Phalacrocorax aristotelis</i>) ■ A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) ■ A148 Purple Sandpiper (<i>Calidris maritima</i>) ■ A169 Turnstone (<i>Arenaria interpres</i>) ■ A184 Herring Gull (<i>Larus argentatus</i>) According to this SPA's Conservation Objectives document (Version 1, dated 19 November 2024), for the listed SCI, the Conservation Objective is to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is over 15km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	No
Rockabill SPA (site code 004014), c. 16.4km to the north-east	■ A148 Purple Sandpiper (<i>Calidris maritima</i>) ■ A192 Roseate Tern (<i>Sterna dougallii</i>) ■ A193 Common Tern (<i>Sterna hirundo</i>) ■ A194 Arctic Tern (<i>Sterna paradisaea</i>) According to this SPA's site Conservation Objectives document (Version 1, dated 08 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.	There is no direct hydrological link or any other pathway between the proposed residential development at Mooretown (Phase 2), Swords and this SPA. It is over 16km distant and is unconnected via any pathway. No significant effects on water quality, and no effects on the site's SCIs, are predicted. Furthermore, there will be no loss of species, fragmentation or disturbance to the SCIs of this SPA as a result of the proposed development.	No

5.2 Summary of potential impacts of the proposed development

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 or operation of the proposed 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.

No invasive alien plant species (*i.e.* those species listed on Schedule 3 of the *Birds and Habitats Regulations, 2011* (as amended), such as Japanese knotweed or giant hogweed) were identified on site.

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 sites⁵. 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 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.*

⁵<https://curia.europa.eu/juris/document/document.jsf?text=&docid=274644&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=21723482>

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 development. SuDS measures will be incorporated into the design of the proposed development as standard features. SuDS features are highly effective and are required to be included in developments where appropriate (as noted in Section 3.2.1 SuDS are a requirement of Fingal County Council under the GSDS 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 proposed development 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:

- Fingal Development Plan 2023-2029.
- An Coimisiún Pleanála database (www.pleanala.ie – accessed May 2026)
- EIA Portal (www.housinggov.ie/maps.arcgis.com – accessed May 2026).

Permitted and proposed projects in the immediate vicinity of the site were considered in terms of the potential for in-combination effects. This includes the projects listed in **Appendix IV**.

There are no developments planned, permitted or under construction, specifically including those listed in Appendix IV, that will give rise to any significant effects on European sites in combination with the proposed development.

Considering the nature and scale of the proposed development, 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.

Considering the nature and scale of the proposed development, 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.

⁶ *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)*

The Fingal County Development Plan 2023-2029 has a series of objectives intended to protect and enhance the natural environment. For example the plan includes policies for the protection of the county's flood plains, to prevent development in flood plains without satisfying the appropriate justification test and to require the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving in order to reduce the potential impact of existing and predicted flooding risks.

The proposed development will not impact on the flow of water through the area, nor increase potential flood impacts. It is in compliance with all of the relevant Plan objectives.

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:

- Revised 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 2024 and 2025 (Government of Ireland).
- Ireland's 4th National Biodiversity Action Plan 2023 – 2030.
- Fingal Biodiversity Action Plan 2023 – 2030.
- Fingal County Council Fingal Climate Action Plan 2024 – 2029.

None of these plans grant development consent so do not in themselves generate a significant effect that can be assessed along with the permitted 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 development at Mooretown (Phase 2) in Swords, Co. Dublin, individually or in combination with another plan or project, will not have a 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 (An Coimisiún Pleanála) 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.
- Fingal Development Plan 2023-2029.
- 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 date 03/03/2026].
- 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.
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Appendix I: Background

The European⁷ network is a Europe-wide network of ecologically important sites (SPAs and cSACs – 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 biodiversity through the conservation of natural habitats 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.

Stages in the assessment

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

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 (7) (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 below¹⁰:

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 Commission¹¹ 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. \(European Commission 2019\)](#)

Appendix III Table of permitted and proposed developments to which regard has been had in the assessment of potential in-combination impact

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
Permitted or Proposed Developments					
FCC Ref. LADP/002/24	Fingal County Council (Architects Department)	Rathbeale Road, Mooretown, Swords, Co. Dublin	Mooretown Phase 1 Residential Development FCC Architects Department applied for permission on 31st May 2024 for a Local Authority own housing development under Section 179A of the Planning and Development Act 2000, as amended. The proposed development comprises the construction of 247 no. residential units (187 no. houses and 87 no. duplex/apartments, 2-5 no. storeys) with a mix of 1–4 bed homes. It includes extensive landscaping with c.18,065 sq.m of open space, eight pocket parks, and new pedestrian and cycle links. Provision is made for 415 no. car parking spaces and 1,143 no. bicycle spaces, alongside comprehensive site and infrastructural works, including drainage, SuDS measures, PV panels, utilities, and all associated landscaping and services.	Granted Permission (by FCC during monthly council meeting) Link to FCC meeting. 13/05/2024 Under construction	EIA Screening, AA Screening
FCC Ref. LRD0067/S3E	Glenveagh Homes Limited	Townland of Mooretown, Co. Dublin. Two sites - the larger of the sites (5.50 Ha, to the north) is generally bound by: Cronan's Well.	Amendment to Permitted Phase 2A and Phase 3 Residential Development in Mooretown Glenveagh Homes Ltd. applied for permission on 3rd November 2025 for a LRD, including permission for amendments to previously permitted developments (FCC Reg. Ref. F23A/0504 (also known as Mooretown Phase 2A) and ABP Ref. 313362-22 (a 'Strategic Housing Development' (SHD), known as both Mooretown Phase 3 and the Mooretown SHD), at these 2 no. sites totalling c. 6.34 Ha in the townland of Mooretown, north-west of Swords, Co. Dublin.	Granted Permission by FCC with 36 Conditions 11/02/2026	EIA Screening, AA Screening



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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			Amendments to Phase 2A include the omission of 3 no. residential units (all 4-bed), the partial realignment of the permitted Cronan's Well Road; and alterations to car parking and landscaping. Amendments to Phase 3 include the omission of 196 no. residential units (43 no. 1-bed, 120 no. 2-bed and 33 no. 3-bed), comprising 8 no. houses and 188 no. apartments; and alterations to the internal road network, car parking, crèche drop-off spaces, open space and landscaping. Permission is also sought for a mixed-use development with a gross floor area of 34,055.2 sqm and ranging in height from 1 no. to 5 no. storeys that principally comprises: 381 no. residential dwellings (89 no. 1-bed, 198 no. 2-bed, 88 no. 3-bed and 6 no. 4-bed) (29,704.9 sqm), of which 156 no. are houses (84 no. 2-bed, 66 no. 3-bed and 6 no. 4-bed) and 225 no. are apartment units (89 no. 1-bed, 114 no. 2-bed and 22 no. 3-bed) (including triplex typologies); 2 no. commercial units (totalling 257.6 sqm); and a childcare facility (494.2 sqm). Permission is also sought for: internal road, cycle and footpath network; modifications to existing road, junction and car parking arrangements at Main Street, including omission of 2 no. crèche drop-off spaces (permitted as part of the Mooretown Phase 3 development), removal of an existing car parking zone and removal/relocation of 3 no. junctions at Main Street; 500 no. car parking spaces; 23 no. motorcycle parking spaces; cycle parking stores and spaces; hard and soft landscaping, including public open space, communal amenity space and incidental open space; private amenity space as gardens, and balconies and terraces facing all directions; public lighting; bin stores; plant rooms; rooftop PV panels, plant and lift overruns; green roofs; 4 no. sub-stations; and all associated works above and below ground.		
FCC Ref. F25A/0585E	Glenveagh Homes Limited	3 No. sites in the townlands of Oldtown and Rathbeal, north-west of Swords, County Dublin.	Development of Oldtown Phases 2A, 2B and 2C. A proposed residential development at these 3 No. sites with a combined site area of 1.2 Ha in the townlands of Oldtown and Rathbeal, north-west of Swords, County Dublin. The sites are identified as the remaining, undeveloped portions of the larger plots known as Oldtown	Granted Permission by FCC with 28 Conditions 22/01/2026 Under Construction	EIA Screening, AA Screening

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			Phases 2A, 2B and 2C. As part of the application, permission is also sought for amendments to the public open space permitted under Reg. Ref. F23A/0676 at Oldtown Phase 2C.		
FCC Ref. SHD/012/21 ACP Ref. ABP-313362	Gerard Gannon Properties	Lands to the south of Rathbeale Road and to the north and south of Main Street, Mooretown Distributor Road, Celestica/Motorola site, Swords, Co. Dublin	Mooretown SHD along Rathbeale Road Gerard Gannon Properties applied to the Bord for a SHD consisting of 650 no. units (265 no. houses and 385 no. apartments), a creche facility and associated site works.	Granted Permission by ACP with 31 Conditions 31/03/2023 Under Construction	EIAR, NIS
FCC Ref. SHD/004/20 ACP Ref. ACP-313302	Gerard Gannon Properties	Lands to the north of Rathbeale Road and to the west of and north of Miller's Avenue and Glen Ellan Road, Oldtown, Swords, Co. Dublin.	Oldtown Strategic Housing Development Removal of the temporary site structures, construction of a total of 377 no. residential units (173 no. houses, 204 no. apartments), creche and associated site works.	Granted Permission (by ACP with 32 Conditions. 22/02/2023 Under Construction	AA Screening, NIS. Winter Bird Surveys
FCC Ref. F23A/0504	Gerard Gannon Properties	Lands south of Rathbeale Road and to the North of Main Street and to the East of, Mooretown Distributor Road (Western Distributor Link Road), Mooretown, Swords, Co. Dublin.	Residential Development in Mooretown along Rathbeale Road Permission for a residential development was applied for on 24th August 2023. The proposed development will comprise the construction of 96 no. residential units including 46 no. houses and 50 no. duplex units (25 no. apartment units and 25 no. duplex 'house' units) comprising 25 no. 1-bed units, 55 no. 3-bed units and 16 no. 4-bed units. A total of 128 no. car parking spaces is proposed and 326 no. bicycle spaces located within external bike stores, landscaping, boundary treatments, public lighting, future pedestrian access to adjoining school lands and all associated site infrastructure are proposed.	Granted Permission by FCC with 25 Conditions 11/06/2024 Under Construction	EIAR, NIS
FCC Ref. F23A/0676	Gerard Gannon Properties	Lands to the south of Glen Ellan Road, to the east of Miller's Avenue, north of Rathbeale Road, Oldtown, Swords, Co. Dublin	Permission to Complete Residential Development The proposed development will comprise the construction of 23 no. 3-bed, 2- storey houses and 1 no. 2- storey creche as previously permitted	Permission Granted by FCC with 24 Conditions 19/03/2024 Under Construction	N/A

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			under F11A/0473, F19A/0101 (ABP Reg. Ref. 307003-20), F11A/0473/E1 and F11A/0473/E2.		
FCC Ref. F15A/0183/E2	Gerard Gannon Properties	Lands South of the Rathbeale Road, Mooretown, Swords, Co. Dublin.	Extension of Duration for Watermill Park/Phase 1C of Mooretown Development The proposed permission was registered on 1 st November 2023 for extension of duration to construct 190 no. houses (72 no. 4-bedroom 2-storey houses, 15 no. 3-bedroom 3-storey houses and 103 no. 3-bedroom 2-storey houses and 60 no. apartments 4 no. blocks of 15 no. apartments each (with 4 no. 1-bedroom apartments and 11 no. 2-bedroom apartments in 3-storey plus penthouse.) The development includes all associated site works and infrastructure which includes landscaped open space, internal roads, paths, cycle-paths, public lighting, utilities, drainage and surface water attenuation.	Granted Permission by FCC for the Extension of Duration with 3 Conditions 08/12/2023 Under Construction.	EIS
FCC Ref. F18A/0701/E1	Gerard Gannon Properties	Lands south of the Rathbeale Road, and east of the Swords Western Distributor Link Road, and north of Watermill Park, Mooretown, Swords, Co Dublin	Extension of the Duration for Permission (Mooretown Phase 1A) The permission includes omission of 43 no. houses and 15 no. apartments (58 units in total) and the constructions of 39 no. houses and 60 no. apartments (99 no. units in total), a creche of c. 352 no. sqm and 153 no. car parking spaces. This application is referred to as Phase 1A and is the of 3 no. planning applications to revise the parent permission F15A/0183 . Planning permission originally granted under F18A/0701 will cease to have effect on 7th August 2024 and an extension is south until 7th August 2026. It is noted that construction on the apartments could not proceed with construction due to funding issues.	Granted Permission by FCC for the Extension of Duration with 3 Conditions 08/12/2023	N/A
FCC Ref. LRD0080/S3E	Cairn Homes Properties Limited	Estuary West Lands at Holybanks, Swords, Co. Dublin	Amendment to Permitted LRD at Holybanks, Swords The proposed development is an amendment to the permitted development FCC Reg. Ref.: LRD0018/S3E . The amendments will consist of changes to	Permission Granted by FCC with 4 Conditions 12/02/2026 Awaiting Construction	Ecology Note

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			1. the locations and dimensions of the permitted ESB substations and bin and bicycle stores including the relocation of some bicycle storage space into the ground floor of block 10; 2. Condition 5; and 3. Condition 23 Permission is also sought for all associated works to accommodate the proposed changes. The remainder of the permitted development, including accesses, site services, and all other works will be delivered as permitted under FCC Reg. Ref.: LRD0018/S3E.		
FCC Ref. LRD0018/S3E ACP Ref. ACP-323029	Cairn Homes Properties Limited	Estuary West Lands at Holybanks, Swords, Co. Dublin	Large Residential Development at Holybanks, Swords Large-Scale Residential Development at this c.13.57 ha (gross) site located within the Estuary West Lands at Holybanks, Swords, Co. Dublin. The main development site is bounded by Glen Ellan Road to the south, Jugback Lane/Terrace to the west, the former Celestica factory site to the east and the Broadmeadow River to the north. Junction and road improvement works are proposed to the Glen Ellan Road / Balheary Road junction and the R132 Dublin Road / R125 Seatown West Roundabout. The proposed development will consist of a residential scheme of 640 no. units (219 no. 1-bed units, 281 no. 2-bed units, 119 no. 3-bed units and 21 no. 4-bed units) along with childcare facility (c.537 sq.m in proposed Block 11).	Appeal lodged to ACP 14/07/2025 Appeal to ACP withdrawn 29/09/2025 Permission Granted by FCC with 43 Conditions 09/10/2025	EIA, NIS
FCC Ref. F25A/1120E ACP Ref ACP-500881	Kavco Estuary Project Ltd.	The Estuary, Townparks, North Street, Swords, Co. Dublin, K67 E840	The Estuary Residential Development Planning permission is sought for: i) Demolition of the existing two-storey public house known as 'The Estuary';	Permission Refused by FCC with 5 Conditions 04/02/2026 Appeal lodged with ACP 02/03/2026	AA Screening, SSRA

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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			ii) The construction of a part four-, part five-storey flat-roofed mixed-use building, comprising 39 no. apartments (25 no. 1-bed and 14 no. 2-bed units) arranged over ground to fourth floor levels, with the fourth floor set back from Balheary Road and North Street; iii) Provision of 1 no. ground-floor commercial/retail unit fronting Balheary Road; iv) All apartments will have direct access to an area of private amenity space in the form of a balcony/terrace and will have shared access to communal amenity space including a landscaped ground-level courtyard and a roof-level communal amenity garden; v) Provision of 94 no. secure bicycle spaces and 8 no. cargo bike spaces within an internal store, and 20 no. visitor bicycle spaces proposed within the courtyard at ground floor level; (vi) Provision of refuse storage, plant rooms and ESB substation at ground floor level; (vii) All ancillary works including landscaping, boundary treatments, SuDS drainage (including blue green roofs), and all associated site services, site infrastructure and associated site development works necessary to facilitate the development.	Awaiting ACP decision	
FCC Ref. F24A/1125E ACP Ref. ACP-233489	Rathbeale Developments Limited	Lands at the junction of Rathbeale Road and Watery Lane, Swords, Co. Dublin	Residential Development at the junction of Rathbeale Road and Watery Lane, Swords Planning permission is sought for the (i) demolition of vacant/derelict single-storey shed; (ii) construction of a residential development of 36 no. apartments (16 no. one bedroom & 20 no. two-bedroom) within 2 no. apartment blocks (Block 1 of four-storey height, with set-back fifth floor level and roof terrace, and containing 27 no. apartments & Block 2 of three-storey height and containing 9 no. apartments); (iii) all apartments will have direct access to an area of private amenity space, in the form of a garden/balcony and will have shared access to 322sq.m of external communal amenity space at ground/roof terrace levels and	Permission Refused by FCC 29/07/2025 Permission Granted by ACP with 22 Conditions 23/12/2025 Awaiting Construction	NIS, EcIA, Bat Survey, Tree Survey

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			bin store/bicycle stores at ground floor level; (iv) provision of 14 no. vehicular parking spaces (inclusive of 1 no. accessible spaces) and 2 no. motorcycle parking spaces at ground level accessible via Watery Lane; and (v) all ancillary works including tree removal/planting, landscaping, boundary treatments, visitor bicycle parking, SuDS drainage and all site services, site infrastructure and associated site development works necessary to facilitate the development.		
FCC Ref. YA06F.304624	Fingal County Council	Malahide Demesne, Kilcrea, Newbridge Demesne, Donabate, Fingal, County Dublin	Broadmeadow Way - Greenway between Malahide Demesne and Newbridge Demesne The greenway would travel along a linear site extending c. 6km in length between Malahide Castle and Newbridge House and their surrounding parklands. The site travels through various landscapes including demesne landscapes and parklands, estuarine/coastal landscape (foreshore), rural/agricultural lands and urban and residential environments. It commences at Malahide Demesne, then travels along the northern side of the R106 regional road, through a residential laneway (O'Hanlon's Lane) and onto Bissets Strand. At that point it rises to the same level as the Dublin to Belfast railway embankment and crosses Malahide Estuary alongside the existing railway line. The site continues through agricultural lands at Kilcrea and crosses the River Pill at two locations. It continues onwards to Corballis road and then travels westwards through agricultural lands, after which it crosses the new Donabate Distributor Road (Phase 1). Thereafter it crosses Hearse Road and travels onwards to its finishing point at Newbridge Demesne.	Permission granted by ACP 19/05/2020. Under construction	EIAR; NIS
TA06F.306794	Elchoir Construction Limited	Lands adjacent to the existing residential development known as 'The Gallery', Turvey Walk, off Turvey Avenue, To the west of Donabate Train Station, Donabate, Co. Dublin	Residential Development at Turvey Avenue Elchoir Construction Limited lodged a SHD planning application to An Bord Pleanála on 4th March 2020 at lands adjacent to the existing residential development known as 'The Gallery', Turvey Walk, off Turvey Avenue, to the west of Donabate Train Station, Donabate, Co. Dublin. The development consists of 144 no. apartments and 1 no. retail unit in three blocks, all over a single basement. The site has a total area of	Permission granted by ACP 10/08/2020. Under construction	EIA Screening; AA Screening

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			1.16ha with a density of 124 units per hectare and is 3-5 storeys in height over basement.		
F20A/0630	Drumargh Ltd	Lands at Turvey Walk, fronting Turvey Avenue, adjacent to Donabate Train Station, and the residential development of The Gallery, Donabate, Co Dublin	Mixed-use Development at Turvey Walk Permission for a mixed use (Retail convenience foodstore, 4 no. retail units and a café unit) development in 2 no. Blocks as follows: 1) Block 01: Two storey structure (with plant room at roof level) comprising 4no. retail units at ground floor level, internal ESB substation, car park at ground floor level, providing for car and bicycle parking spaces, and a licensed retail convenience foodstore at first floor level (1,187m ² net floor area) including an off licence. 2) Block 02: Change of use of existing residential dwelling and provision of an extension to now provide for a single storey café unit. 3) Demolition of shed structure, removal of portacabin and construction of a public plaza development with landscaping, seating and bicycle parking to serve Block 2. 4) Utilisation of existing vehicular and pedestrian access with associated widening and improvements, including provision of a right hand turn on Turvey Avenue. 5) New internal access roundabout with associated landscaping. 6) Loading Bay. 7) Landscaping. 8) Boundary Treatments. 9) And all ancillary site and engineering works necessary to facilitate the development.	Permission granted by FCC 09/05/2021.	
FCC Ref. PARTXI/004/21 (Part 8)	Fingal County Council	Ballymastone, Donabate, Co. Dublin	Ballymastone Recreational Hub This multifunctional campus will provide for an extensive range of sporting and recreational activities as a shared public facility; these include a floodlit 8 no. lane all-weather athletics track surrounding a grass soccer sized pitch, a full sized all-weather GAA pitch which also provides for 2 no. all-weather soccer pitches with flood lighting, a combined playground and skate park, car / cycle parking, a 6m wide access road, extensive walking and cycling infrastructure, bleacher seating and extensive landscape planting .	Permission Granted by FCC 14/09/2021 Under construction	AA Screening; EIA Screening; SSFRA



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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
FCC Ref. PARTXI/002/22	Fingal County Council (Economic Enterprise Tourism and Cultural Development Department)	Adjacent to Fingal County Hall and Swords Castle - the road junction of North Street, Seatown Road, Bridge Street and Main Street, Swords	Swords Cultural Quarter (SCQ) The proposed creation of a Cultural Quarter, Swords Cultural Quarter (SCQ), within Swords Town centre, Co. Dublin, in proximity to Fingal County Hall and Swords Castle [a National Monument (No.340), Recorded Monument (RMP Ref. DU011-034001-) and Protected Structure (No.351)], with an overall site area of 15,751m ² (3.89 acres) comprising: the road junction of North Street, Seatown Road, Bridge Street and Main Street, Swords; Fingal County Council Executive car park (site area: 2,400m ²) at the junction of North Street and Seatown Road; St. Michael's House, Seatown Road (site area: 542m ²); Swords District Court House (a Protected Structure (RPS No.350); 4 no. terraced 2-storey commercial vacant properties at Units 1-4 No.20 North Street; Fingal County Hall external public space (site area: 1,881m ²); vacant plots at No.'s 1 – 8, 10-13, 15 North Street adjacent to Swords Castle; a single storey commercial property at 17 North Street and Chamber House 17A North Street; single storey structure located on North Street (west side); and the existing side entrance area of Swords Park accessed from North Street, Swords. The site is located within the boundary of the Zone of Notification for the Historic Town of Swords RMP DU011-35.	Permission Granted by FCC 12/09/2022 Under Construction	EIA Screening, AA Screening, Ecology Survey
FCC Ref. PARTXI/006/24	Fingal County Council (Architects Department)	Woodside, Swords	Part 8 – Woodside, Swords Social Housing 34 social units proposed in Woodside Swords between Foxwood and Mountgorry, along Clifford's Lane.	Permission Granted by FCC 10/03/2025 Awaiting Construction Due for Completion Q1 2027	EIA, AA Screening
FCC Ref. PARTXI/006/22	Fingal County Council	Seatown Road, Swords, Co. Dublin.	Stage 1B Seatown Rd 36 No. apartments & associated site works.	Permission Granted by FCC 13/03/2023 Under Construction	EIA Screening, AA Screening



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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
ACP Ref. ACP- 314253	Fingal County Council	Pinnock Hill, Fosterstown North, Swords, Co. Dublin	Pinnock Hill SHD, Fosterstown, Swords 7-year permission for 219 no. apartments, creche and all associated site works.	Permission Granted by ACP with 26 Conditions 30/03/2023 Under Construction	EIAR, AA Screening
FCC Ref. LRD0025/S3E ACP Ref. ACP-321455	Bartra Propco No. 23 Limited	A site fronting the Swords to Malahide Road (R106), Mountgorry, Swords, Co. Dublin	Mountgorry LRD, Malahide Rd, Swords The proposed development will principally consist of: the construction of 123 No. residential units (55 No. one bed apartments and 68 No. two bed apartments). The development will be provided in a courtyard block arrangement ranging in height from part 4 No. to part 5 No. storeys. The proposed development has a gross floor area of c. 10,291 sq m.	Permission Refused by FCC 20/11/2024 Permission Granted by ACP Awaiting Construction	
FCC Ref. LRD0057/S3E	Golden Port Homes Limited	Lands at Forest Road, Swords, Co. Dublin	Forest Road LRD, Swords The proposed development will consist of a total of 109 no. residential units (42 no. duplex units; 41 no. apartments; 26 no. houses).	Permission Granted by FCC with 27 Conditions 12/12/2025 Awaiting construction	
FCC Ref. SHD/013/21 ACP Ref. ACP- 313223	Jacko Investments Limited	The Lord Mayor's Public House, Main Street, Swords, Co Dublin, K67 W8N4	Lord Mayor SHD, Main Street Swords Demolition of the existing buildings, construction of 146 no. apartments, creche and associated site works.	Permission Granted by ACP 03/04/2023 Under Construction	EIAR, NIS
FCC Ref. LRD0039/S3 ACP Ref. ABP-320885-24	Glenveagh Living Limited	Lands at Ballymastone, Donabate, Co Dublin	Ballymastone Phase 2 The development consists of the construction of a residential development, which represents Phase 2 of the wider development of the Ballymastone Lands (as identified in the Donabate Local Area Plan 2016 (as extended)), ranging in height from 2 to 6 storeys to accommodate 364 no. residential dwellings (including a mix of apartments, duplexes and houses), a foul pump station and public open space. The site will accommodate 278 no. car parking spaces, 1457 total	Permission Granted by An Coimisiún Pleanála on 13/01/2025. Under construction	EIA,NIS,SSFRA

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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services and plant areas. Landscaping will include communal amenity areas, and a significant public open space provision.		
FCC Ref. LRD0064/S3E	Cairn Homes Properties Limited	Corballis East, Donabate, County Dublin	Aledo Donabate Residential Development Amendment The proposed amendments relate to part of the Main Residential Development Site, as permitted under LRD0017/S3, to the north of the Donabate Distributor Road (DDR) only. The proposed amendments result in an overall decrease of 21 no. units, from 1,020 no. units previously permitted to 999 no. now proposed.	Permission Granted by FCC with 39 Conditions 25/02/2026 Under Construction	AA Screening
FCC Ref. LRD0017/S3	Aledo Donabate Ltd	Corballis East, Donabate, Co Dublin	Aledo Donabate Residential Development The development consists of the construction of 1,020 no. new residential dwellings on the Main Residential Development Site, provision of 2 no. childcare facilities, provision of 3 no. retail units, 2 no. café units, a community use unit and a medical centre at the proposed local centre area, total of 902 no. car parking spaces are proposed, 39 no. on-street visitor parking spaces, together with a total of 3,013 no. bicycle parking spaces, series of public parks, open spaces, pocket parks and communal open spaces are proposed throughout the Main Residential Development Site, provision of the Corballis Nature Park, vehicular access to the Main Development Site will be via two existing junctions from the DDR to the south and a new vehicular entrance to the north-east at New Road and all other ancillary works above and below ground on a site of approximately 41.9 ha.	Permission Granted by FCC with 48 Conditions 04/04/2024 Under Construction	EIAR, NIS, SSFRA
FCC Ref. F24A/0169	Marshall Yards Development Company Limited	Corballis East, Donabate, Co Dublin	Residential Development at Corballis East The permitted development, which will have a total Gross Floor Area of 8,028 sqm, will consist of: the construction of a Residential Development comprising 98 no. units including 70 no. two storey houses, 4 no. three storey 4 bed houses, and 6 no. two storey maisonette buildings	Permission granted by FCC 28/01/ 2025.	EIA Screening, AA Screening & NIS

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			comprising a total of 24 no. 1 bed units. The development will also comprise of: alterations to the access road associated with the Residential Development permitted under Fingal County Council Reg. Ref. F22A/0527; the provision of internal roads and footpaths; pedestrian connections to the Donabate Distributor Road; pedestrian and vehicular connections to the adjoining site to the west (subject to a Live Planning Application for a Large-Scale Residential Development as per Fingal County Council Reg. Ref. LRD0017/S3); 73 no. car parking spaces; 5 no. car club spaces; bicycle and bin stores; hard and soft landscaping; balconies and terraces; boundary treatments; solar panels; 2 no. ESB substations; public lighting; and all other associated site and development works above and below ground.		
FCC Ref. SHD/006/20 ACP Ref. ABP-311059-21	Aledo Donabate Limited	Corballis East, Donabate, Dublin	Residential Development at Corballis East The development consists of the construction of a residential development of 1,365 no. new residential dwellings (including a mix of apartments and houses), residential amenities, 3 no. childcare facilities, 7 no. retail/café units, car parking spaces, 2,613 bicycle parking spaces, public open spaces, road improvements and services.	Permission Granted with Conditions by ACP 10/11/2022. Under construction	EIAR, NIS, AASR
F22A/0527	Glenveagh Homes Limited	Corballis East, Donabate, Co Dublin	Residential Development at Corballis East The development, which will consist of: the construction of 96 No. residential units, 1 No. two storey creche, vehicular access from the Donabate Distributor Road; internal roads, footpaths and a shared pedestrian and cyclist link, 166 No. car parking spaces bicycle and bin stores; hard and soft landscaping; boundary treatments; green roof; solar panels; plant; 2 No. ESB substations; lighting; signage; drainage works; and all other associated site and development works above and below ground.	Permission Granted by FCC 30/08/2023 Under Construction	AA, NIS, EclA, Archaeological Assessment; SSFRA; EIA Screening
FCC Ref. F23A/0192	Aledo Donabate Ltd	Corballis East, Donabate, County Dublin	Corballis East Construction Access The development will consist of the provision of construction access and haul road (total length approx. 494m), to facilitate the construction of	Permission Granted by FCC 25/07/2023	AA, EclA,

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			development permitted under Reg. Ref. F20A/0204 (ABP PL06F.308446), on a site of approx. 1.1ha. The haul road extends from the existing access onto the Donabate Distributor Road (R126), northwards towards Main Street, Donabate, to connect with the site associated with Reg. Ref. F20A/0204 (ABP PL06.308446). The haul road infrastructure works include: • Temporary road surface finish with a width of approx. 5.5m and length of approx. 494m; • Incorporation of swales along the proposed haul road edge which will discharge to a temporary drainage basin; and • All ancillary and associated site development, drainage, landscape and boundary treatment works. It is intended that this additional haul route will assist in reducing the level of construction traffic accessing the site via the permitted construction and development access from Main Street, Donabate. On completion of development permitted under Reg. Ref. F20A/0204 (ABP PL06F.308446), the extent of the haul route will be reinstated to its current agricultural use or incorporated into future development of zoned lands at Corballis East.	Under construction	
FCC Reg. Ref. LADP/0001/24 (S179A)	Fingal County Council	New Road, Donabate, Co. Dublin	Section 179A – New Road, Donabate FCC intends to carry out a housing development under S179A(5) of the Planning and Development Act 2000 (as amended) on a c. 4.72ha site at New Road, Donabate, Co. Dublin. The proposed housing development will include for the construction of 175 no. dwelling units and a single storey crèche of c. 365 sq.m. The development will also include 2 no. multi-modal exits onto New Road, 2 no. multi-modal connections to existing and under construction developments to the north and east, 139 no. car parking spaces, cycle parking, bin stores, hard and soft landscaping, PV panels, public and community amenity spaces and all associated site development works. The proposed development was put to Councillors at a meeting held on 8th April 2024, where the proposal was subject to 5 no. motions proposed by Councillors.	Approved by FCC 08/04/2024 Under Construction	AA Screening

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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			The agenda item relating to the proposed development was noted by Councillors, and construction has commenced.		
FCC Ref. F18A/0335	Bovale Developments Unlimited Company	Holywell, Swords, Co. Dublin.	Holywell, Swords A residential development on a 0.77 ha site bounded by Holywell Avenue & Holywell Court to the east, Holywell Drive & Holywell Gardens to the south and to the north and west by the recently constructed link road section that links to the R125 to the south and Mountgorry Way to the east. Access to the site is from the recently constructed link road section that bounds the development to the north. The proposed development comprises 29 dwellings in the following mix: A 2/3 storey duplex/apartment building 7 no. 2-bedroom ground floor apartments, 2 no. 1-bedroom ground floor apartments, 9 no. 3-bedroom duplex units and 2 no. 2-bedroom two storey apartments. The development also consists of 9 no. two houses comprising 3 no. 3-bedroom mid-terraced Type B units; 2 no. 3-bedroom end of terrace Type B1 units; 2 no. 4-bedroom semi-detached Type C units and 2 no. 3-bedroom semi-detached Type D units together with all associated site development/car parking/landscaping works.	Permission Granted by FCC with 19 Conditions 03/01/2019 Under Construction	EcIA, Tree Survey
FCC Ref. LRD0055/S3E	Bovale Developments Unlimited Company	Barrysparks and Crowscastle (lands generally bound by the R132 to the north, Lakeshore Drive to the west, Drynam Road to the east and the Holywell Distributor Road to the south)., Swords, Co. Dublin	Barrysparks LRD The development will consist of a Large-scale Residential development (LRD) of 530no. residential units and creche in 4no. blocks with a total gross floor area (GFA) of 49,210sqm (excluding basement car parking) with associated ancillary accommodation, private balconies, communal amenity spaces and public open spaces. The development will be accessed from the south via a connection to the existing roundabout on the Holywell Distributor Road and from the north via a fully signalised junction with the R132 including works to the north and south bound carriageways and central median of the R132 to provide for the fully signalised junction with associated turning lanes and a separate pedestrian and cycle crossing on the R132.	Additional Information received by FCC 16/02/2026 AI Deemed Significant by FCC 11/03/2026	EIAR/NIS

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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			Permission is also sought for hard and soft landscaping in public realm and public open spaces within the development, cycle and motorcycle parking, bin stores, water supply and foul water connections, surface water infrastructure, connections to public utilities, ESB substations, plant areas, roof mounted photovoltaic (PV) panels, building and directional signage and all associated site and development works. A 10-year permission is sought.		
FCC Ref. F24A/1179E	Kinwest Limited	Lands at Auburn House, Malahide, Co. Dublin	Amendment to Auburn House Residential Development The proposed development seeks to provide amendments to the previously permitted development at the subject site, granted under Reg. Ref. F22A/0581 (ABP Ref. 316504-23). The proposed changes will see a net reduction of 6 no. units from 91 no. residential units (44 no. housing units, 34 no. apartment units, and 13 no. duplex units), to now provide 85 no. residential units (54 no. housing units and 31 no. duplex units). The proposed development will also comprise of revisions to the pumping station previously granted under Reg. Ref. F22A/0579, ABP Ref. 316444-23; F22A/0580, ABP Ref. 316498-23 (as further amended by Reg. Ref. F24A/0811E and Reg. Ref. F24A/0812E); and F22A/0581, ABP Ref. 316504-23. The proposed development will also comprise of in curtilage car parking; boundary treatment; landscaping works; bicycle and bin stores; ESB substation, and all other ancillary site development works that are necessary to accommodate these proposed amendments	Permission Granted by FCC with 13 Conditions 19/05/2025 Under Construction	
FCC Ref. F22A/0581 ACP Ref. ACP-316504	Kinwest Limited	Lands at Auburn House, Malahide, Co. Dublin	Amendment to Auburn House Residential Development Preservation of Auburn House and its stables as 1 residential dwelling. Construction of 92 residential units; landscaped public and communal open spaces, public lighting, 1 ESB unit substation; 1 foul pumping station; foul sewer works and all associated ancillary site development infrastructure.	Appeal lodged to ACP 25/04/2024 Permission Granted by ACP with 53 Conditions 13/05/2024 Under Construction	EIAR, NIS

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
FCC Ref. F24A/0612E ACP Ref. ACP-320878	Marron Estates	Knocksedan Demesne, Naul Road, Brackenstown, Swords, Co. Dublin	Residential Development in Knocksedan The proposed residential development will connect to existing infrastructure previously approved and constructed under Reg. Ref. F06A/0347 (which was later extended under Reg. Ref. Nos. F06A/0347/E1, F06A/0347/E2, F06A/0347/E3 & F20A/0309/E1). Construction of a residential development consisting of 59 houses, 18 apartments, a creche facility and all associated site works.	Permission Refused by FCC 26/08/2024 Permission Granted by ACP with Conditions 25/06/2025 Under Construction	N/A
FCC Ref. F23A/0103	SK Biotek Ireland	SK Biotek Swords Campus, Watery Lane, Townparks, Swords, Co. Dublin, K67 AY91	Construction of an Active Pharmaceutical Ingredient Manufacturing Facility at a SEVESO site The proposed development will consist of the construction of a modern c. 1,010m ² Active Pharmaceutical Ingredient (API) manufacturing facility with a parapet height of c. 14.63m (with handrail and plant above), located in the south-eastern part of the campus. The proposed development will replace part of an existing API building (to be demolished in accordance with Reg. Ref. F22A/0673 and will employ the latest industry technology with no change to the nature of operations undertaken (which will be similar to those previously used in the API building area that is to be demolished and elsewhere throughout the overall site.) The proposed development represents a modification to a SEVESO (lower tier) site and relates to development which comprises an activity requiring an industrial emissions (IE) LICENCE. (The site currently operates under IE Licence No P0014-04 and will comply with any future revisions to that licence.)	Permission Granted by FCC with 13 Conditions 07/02/2024 Under Construction	EIAR, NIS
FCC Ref. F25A/0008E	Roadstone Limited	Feltrim Quarry, Swords, Co. Dublin, K67X0Y7	Deepening existing extraction area at Quarry The development will consist of: deepening of the existing extraction area permitted under F15A/0291 (c. 10.8 hectares) to minus 113 metres below Ordnance Datum OD (-113 mOD); using conventional drilling and blasting techniques; use of mobile crushing and screening plant; aggregate product stockpiles; final restoration to original ground level in accordance with the requirements of condition 5 attached to planning	Permission Granted by FCC with 11 Conditions 06/02/2026	EIAR, NIS

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APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			permission F15A/0291; and all related ancillary site works within an application area of c. 15.5 hectares.		
FCC Ref. FW25A/0480E	D.A. Terminal 3 Limited	Lands within the townland of Huntstown, Swords, Co. Dublin, The subject site fronts onto the R108 to the east.	Construction of an aviation related cargo handling facility with ancillary office space The proposed units will have an overall combined total gross floor area (GFA) of c. 34,623.6 sq.m (alongside ancillary ESB substations, 4 no. security huts with a combined GFA of 30 sqm and pumphouses). The warehouses are c. 12m in height, with the office element being c. 3.3 m in height and located within a landscaped campus on a site of c. 10.7 Ha.	Refused Permission by the FCC under 5 Conditions 09/01/2026 Appeal lodged to ACP 05/02/2026 Application currently under appeal	EIAR
FCC Ref. F25A/1210E	DAA Plc	Dublin Airport Swords Co. Dublin	Cargo Relocation Project DAA Plc are seeking planning permission for development of lands within and to the east of Dublin Airport for Phase 1 of a cargo relocation project, on a site of 15.11 hectares (ha).	Application lodged 22/12/2025 Additional Information Requested by FCC 24/02/2026	EIAR
FCC Ref. F23A/0636 ACP Ref ACP-320815	DAA Plc	Dublin Airport, Swords, Co. Dublin	Dublin Airport Drainage Infrastructure Upgrades to drainage infrastructure and construction of additional drainage infrastructure to improve performance of the surface water management with all associated site works.	Permission Granted by FCC with Conditions 21/08/2024 Appeal lodged to ACP 16/09/2024 Appeal under review	EIAR, NIS
FCC Ref. F23A/0301 ACP Ref. ACP Ref.	DAA Plc	US Customs and Border Protection pre-clearance facility, Pier 4, Terminal 2, and the former Flight Catering Building, Castle	US Customs Expansion A reconfiguration & extension to the existing US Customs & Border Protection pre-clearance facility at Pier 4, Terminal 2, Dublin Airport &	Permission Refused by FCC 02/05/2025	EIAR

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
ACP-317828		Drive, Corballis Park, both located in the townlands of Corballis and Collinstown, Dublin Airport, Swords, Co. Dublin	the partial demolition, refurbishment & upgrade of the former Flight Catering Building, Dublin Airport.	Applicant lodged appeal to ACP 18/08/2025 Permission Granted by ACP with Conditions 02/05/2025	
ACP Ref. ABP-320164-24	Córas Iompar Eireann	Dublin City Centre and Drogheda, Counties Dublin, Meath and Louth	DART + Coastal North Railway Extension of the existing electrification from Malahide to Drogheda (approx. 37km) including the installation of overhead line equipment & associated substations; infrastructure works to facilitate the increase in service frequency and capacity.	Permission granted (confirmation of Railway Order with conditions) by An Coimisiún Pleanála on 19 August 2025.	EIAR, NIS
ACP Ref. PA06f.3121331	Uisce Éireann	New wastewater treatment plant in the townland of Clonshaugh and associated sludge hub centre, orbital sewer outfall pipeline and regional biosolids storage facility in various townlands in County Dublin	Clonshaugh WWTP Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub darte, orbital sewer, outfall pipeline and regional biosolids storage facility in County Dublin The Proposed Project will comprise a new Wastewater Treatment Plant (WwTP) at Clonshaugh and associated infrastructure that will serve the projected wastewater treatment requirements of existing and future drainage catchments in the north and north-west of the Ringsend Agglomeration (i.e. catchments currently draining to Ringsend WwTP), up to the Proposed Project's 2050 design horizon. The Proposed Project will therefore protect public health, safeguarding the environment and facilitating social and economic growth to 2050 and beyond.	Permission granted by An Coimisiún Pleanála on 09 July 2025.	EIAR, NIS
ACP Ref. ACP-314724	National Transport Authority (operating as Transport	Metrolink - Estuary through Swords, Dublin Airport, Ballymun, Glasnevin, and City Centre to Charlemont, Co. Dublin	Railway (Metrolink-Estuary to Charlemont via Dubin Airport) Order 2022 The proposed development comprises of a fully segregated and automated railway and metro mostly underground approximately 18.8km in length with 16 stations running from north of Swords at	Railway Order Granted by ACP with Conditions. 30/09/2025	EIAR, NIS

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
	Infrastructure Ireland)		Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and the City Centre to Charlemont in the south of Dublin City Centre. It includes a 9.4km section of single bore tunnel running beneath Dublin City Centre running from Charlemont to Northwood Station and a 2.3km section of single bore tunnel running beneath Dublin Airport. North of Dublin Airport the railway will emerge from tunnel and will run at surface level and in cut and cover structures to Estuary Station. A new 99m bridge will be constructed over the M50 and a 261m long multi-span Viaduct over the Broadmeadow and Ward River. There will be a total of 16 stations, including 11 underground stations at Dublin Airport, Northwood, Ballymun, Collins Avenue, Griffith Park, Glasnevin, Mater, O'Connell Street, Tara, St. Stephen's Green and Charlemont; 4 retained cut stations at Seatown, Swords Central, Fosterstown and Dardistown and 1 at-grade station at Estuary. A multi-storey 3000 space park and ride close to the M1 Motorway will be provided at Estuary Station, a maintenance depot is located near Dardistown Station which will house all the facilities required for the maintenance and operation of the MetroLink and its rolling stock and the Operational Control Centre. The works will also include railway signalling, command and control and communications systems; provision of electrical substations; establishment of temporary construction compounds; establishment of temporary traffic management and road diversions; new and realigned access routes and road junction improvements; diversion of existing utilities; provision of new drainage infrastructure; provision of environmental mitigation measures; and other infrastructural modifications to facilitate the overall project.		
ACP Ref. <u>ACP-319866</u>	North Irish Sea Array Windfarm Limited	Off the coast of counties Dublin, Meath and Louth. The onshore infrastructure will be located in County Dublin	North Irish Sea Array Offshore Wind Farm Offshore wind farm consisting of offshore wind turbine generators, offshore substation platform and subsea cables, landfall and associated	Application lodged to ACP 07/06/2024 Awaiting Decision	EIAR, NIS

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Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
			infrastructure, grid facility and associated infrastructure, and onshore cables and grid connection.		
ACP Ref. ACP-317121	National Transport Authority	Along the R132 Swords Road, Drumcondra Road and Dorset Street between Pinnock Hill, Swords and Parnell Square, and within the Fingal County Council (FCC) and Dublin City Council (DCC) administrative areas.	BusConnects - Swords to City Centre Bus Corridor Scheme Swords to City Centre Core Bus Corridor Scheme has an overall length of approximately 12km including roadworks to facilitate bus, cycling and urban realm improvements along with any associated ancillary/accommodation works for the scheme.	Approved by ACP with Conditions 19/06/2024	EIAR, NIS
FCC Reg. F25A/0710E	National Transport Authority (Ian Gourley)	Lissenhall Little, West of the M1- Junction 4, Lissenhall, Co. Dublin	NTA Bus Park & Ride The development will consist of a Park & Ride facility with a total of 733 no. car parking spaces, including 522 standard spaces, 37 spaces for mobility-impaired users (including 29 no. standard and electric vehicle charging spaces, along with 8 no. larger spaces), 72 no. spaces designated for electric vehicles and an additional 72 no. space futureproofed for electric vehicles. Additionally, the facility will include 3 no. bus bays and passenger shelters to enhance accessibility and convenience for users. Provision for active travel will be made with a hardstanding area for a bike shelter and lockers. The scheme will also include hard and soft landscaping, planting, lighting, boundary treatments, surface-foul water drainage, public lighting, CCTV, ESB substation, and all other associated and ancillary works.	Application lodged to FCC 06/08/2025	EIAR, NIS
ACP Ref. ACP-319422	Eirgrid Plc	Comprises a 37.5km underground cable circuit from the existing Woodland Substation in Co. Meath to the existing Belcamp Substation in Fingal, Co. Dublin, extending across	East-Meath-North Dublin Grid Upgrade Comprises a 37.5km underground cable circuit from the existing Woodland Substation in Co. Meath to the existing Belcamp Substation in Fingal, Co. Dublin, extending across various townlands between these two substations.	Approved by ACP with Conditions 05/02/2025	EIAR, NIS

Proposed Development (Phase 2) on Lands at Mooretown, Swords, Co. Dublin

APPROPRIATE ASSESSMENT SCREENING REPORT

Reg. Ref.	Applicant	Location	Description – Overview	Status	Environmental Assessments
		various townlands between these two substations.			
ACP Ref. ACP-324069	FCC		The Burrow CFERM Scheme Proposed development under sections 175 and 177AE of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001-2005 (as amended) for proposed coastal and flood risk management works. Construction of a c. 190m long earth embankment; construction of a combined c.130m long sheet piled flood wall and a c.200m embankment; and construction of seven fishtail (Y shaped) groynes structures with beach nourishment scheme	Application lodged to ACP 09/02/2026 Case is due to be decided by 30/07/2026	EIAR, NIS



Appendix IV HHQRA



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Hydrological and Hydrogeological Qualitative Risk Assessment

Mooretown Lands Phase 2, Swords, Co. Dublin

CLIENT

Fingal County Council

DOCUMENT REFERENCE

257501.1029WR02

DATE

18 May 2026

DOCUMENT CONTROL SHEET

Document Control Sheet	
Our Reference	257501.1029WR02
Original Issue Date	18 May 2026
Client:	Fingal County Council
Client Address:	County Hall, Main St, Swords Demesne, Swords, Co. Dublin, K67 X8Y2

Revision	Revision Date	Description

Details	Written by	Approved by
Signature		
Name	Denis Power	Alan Wilson
Title	Junior Environmental Consultant	Environmental Consultant
Date	18 May 2026	

Disclaimer

This report considers the specific instructions and requirements of our client. It is not intended for third-party use or reliance, and no responsibility is accepted for any third party. The provisions in this report apply solely to this project and should not be assumed applicable to other developments without review and modification.



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1. INTRODUCTION

1.1 Background

AWN Consulting Limited (AWN) has prepared this Hydrological and Hydrogeological Qualitative Risk Assessment to support the competent authority in determining whether the Proposed Development has the potential to give rise to significant effects on the receiving hydrological or hydrogeological environment. This assessment should be read in conjunction with Chapter 10 (Hydrology & Hydrogeology) of the EIAR.

The Proposed Development consists of a residential development comprising 360 no. residential units and a crèche, together with associated infrastructure and site development works. These works include internal roads, footpaths, car and bicycle parking, public and private open spaces, bin and bicycle stores, public lighting, landscaping/amenity areas, and all associated surface water and foul drainage infrastructure. Vehicular access will be provided through the Phase 1 construction accesses currently under construction (Planning Ref. LADP/002/24).

The Proposed Development lands extend to c. 14.75 ha and consists of two (2) no. distinct land parcels situated on the southern side of Rathbeale Road located on the western side of Swords, Co. Dublin. The northern parcel is directly bounded by the road, while the southern parcel lies immediately south and east of Phase 1 of the Mooretown development. The southern parcel is enclosed on three sides by existing and emerging residential development. The two parcels are separated by the Phase 1 lands, reflecting the planned, sequential build-out of the wider Mooretown strategic residential lands.

The surrounding environment is predominantly suburban to the east and south, characterised by established medium-density residential neighbourhoods, educational facilities, and a network of green spaces. To the west, the landscape transitions to a more semi-rural character, comprising open agricultural fields, reflecting the historical land use of the wider Mooretown area. Site topography falls from approximately 40m AOD in the south-west to approximately 24m AOD to the north, with localised low points associated with existing drainage ditches.

The potential impacts on the receiving water environment considered are:

- ▶ The management of surface water runoff, shallow groundwater seepage and accidental leaks or spillages during the construction phase, including any localised, temporary dewatering associated with rainfall accumulation or perched groundwater, and the potential for indirect effects on downstream surface water features and locally sensitive receptors such as St Cronan's Well.
- ▶ The management of operational surface water runoff through a fully separated, SuDS-led drainage network, with controlled discharge to the stormwater sewer. Given the residential nature of the Proposed Development, it is anticipated that no bulk oil, fuel or hazardous substance storage will occur during the operational phase, significantly limiting the potential for accidental pollution events.

1.2 Objective of the Report

The objective of this Hydrological and Hydrogeological Qualitative Risk Assessment is to assess the potential for any likely significant impacts on the receiving hydrological and hydrogeological environment arising from the Proposed Development during both the construction and operational phases, prior to the application of any standard mitigation or control measures.

This assessment specifically considers the potential for construction phase surface water run-off, accidental leaks, and operational phase stormwater discharges to affect downstream water quality and the status of connected waterbodies. The Proposed Development maintains an indirect hydrological connection to the Broadmeadow_040 WFD river waterbody, via a network of on-site and adjacent drainage

ditches and minor streams which connect to the Newtown 08 and Mooretown 09 rivers. These watercourses ultimately discharge to the Broadmeadow_08 c. 1.4 km downstream of the northern parcel of the Proposed Development. From this point, the Broadmeadow_08 river flows eastwards into the Broadmeadow Water transitional waterbody (c. 4 km downstream), before entering Malahide Bay coastal waterbody (c. 7.5 km downstream). These downstream systems include sensitive estuarine and coastal environments i.e. where the relevant European Sites are located.

The assessment examines the likelihood of adverse impacts on water quality, hydrological connectivity, and the overall status of these receiving waterbodies in the absence of mitigation.

The assessment relies on information regarding construction and design provided by AKM Design Group, as follows:

- ▶ Infrastructure Report - Residential Development on Lands at Mooretown, Swords or Fingal County Council (AKM Design Group, 2026).
- ▶ Appendix B of Infrastructure Report - Ground Investigation Report (Site Investigations Ltd, 2024).
- ▶ Section 8 of Infrastructure Report - Site-Specific Flood Risk Assessment (FRA) (AKM Design Group, 2026).
- ▶ Construction & Environmental Management Plan (CEMP) – Mooretown Phase 2 – Fingal County Council (AKM Design Group, 2026).
- ▶ Surface Water Management Plan (SWMP) – Mooretown Phase 2 – Fingal County Council (AKM Design Group, 2026).
- ▶ Various design site plans and drawings, as submitted with this planning application.
- ▶ Consultation with design engineers.

This report was prepared by Denis Power and reviewed by Alan Wilson. Alan Wilson (BSc, AISEP) is an Environmental Consultant at AWN with over five years of professional experience in environmental assessment and consultancy. Alan holds a BSc (Hons) in Environmental Management in Agriculture and Environmental and Geographical Sciences. He has worked on a wide range of large-scale infrastructure and development projects, contributing to the preparation of Land, Soils, Geology and Hydrology & Hydrogeology Environmental Impact Assessment Reports (EIARs), site-specific Flood Risk Assessments (Stages 1 and 2), baseline environmental studies, hydrological and hydrogeological risk assessments, Water Framework Directive (WFD) assessments, assimilative capacity assessments, environmental sensitivity assessments and environmental due diligence assessments (Stages 1 and 2). Alan also has experience in supervising site investigations, as well as groundwater and surface water monitoring on operational developments and both greenfield and brownfield sites. Prior to his role at AWN, he gained additional experience within ecology and forestry-related projects. Alan is a member of the International Association of Hydrogeologists (IAH), Irish Group, and holds Associate (AISEP) membership with the Institute of Sustainability and Environmental Professionals (ISEP).

Denis Power is a Junior Environmental Consultant with AWN Consulting with ongoing roles within the water department. Denis has a BSc in Environmental Management and planning from Dublin Technical University and has studied in Utrecht University's Earth surface and water master's programme. Denis has worked on a range of projects including ground and surface water monitoring and sampling, environmental impact assessment reports, hydrological risk assessments, lake abstraction assessments and QGIS mapping. Denis is a member of the International Association of Hydrogeologists (Irish Group).

1.3 Hydrological Setting

According to EPA mapping (2026), there are several drainage ditches and streams that traverse and bound the southern and northern parcels of the Proposed Development. The southern parcel contains a drainage ditch that traverses the centre of the site from west to east/east to west. This drainage ditch appears to be hydrologically connected to the Newtown 08 river (European Code: IE_EA_08B020800) located along the eastern boundary of the northern parcel, commonly referred to as the Mooretown Water.

As stated above, the drainage ditch traverses the southern parcel from west to east/east to west and is connected to two (2) no. unnamed EPA river waterbodies located to the immediate east and north-west of the southern parcel, respectively. The eastern unnamed waterbody flows north through a residential area and appears to be culverted for most of its route, before discharging to another unnamed waterbody c. 400 m downstream of where it exits the southern parcel. This unnamed waterbody discharges to the Newtown 08 river along the eastern boundary of the northern parcel.

The unnamed waterbody along the north-western boundary of the southern parcel appears to originate where the drainage ditch intersects the western boundary. This waterbody flows north and is also largely culverted beneath the Mooretown Phase 1 residential area, before discharging to the Newtown 08 river along the southern boundary of the northern parcel. The Mooretown 09 river is located along the western boundary of the Phase 1 wider Mooretown development (Planning Ref. LADP/002/24), i.e. north of the southern parcel and south of the northern parcel and discharges to the Newtown 08 along the southern boundary of the northern parcel.

The Newtown 08 river flows along the southern and eastern boundary of the northern parcel of the Proposed Development, establishing hydrological connectivity between both parcels. From here, the Newtown 08 flows north before discharging into the Broadmeadow 08 (Broadmeadow River) approximately 1.4 km downstream / c. 1.1 km north of the northern parcel of the Proposed Development.

It should be noted that all of the aforementioned river waterbodies belong to the Broadmeadow_040 WFD river waterbody.

The Broadmeadow 08 river flows in an easterly direction before discharging to the Broadmeadow Water Transitional Waterbody (European Code: IE_EA_060_0100) c. 4 km downstream / c. 2.6 km east of the Proposed Development. A further 3.5 km downstream, the Broadmeadow Water transitional waterbody discharges to the Malahide Bay coastal waterbody (European Code: IE_EA_060_0000).

In addition to the drainage ditches and river waterbodies described above, a locally significant spring-fed feature, StCronan's Well (Record of Monuments and Places Code: DU011-018), is located in the south-eastern corner of the southern parcel of the Proposed Development. The well represents a point of groundwater emergence at surface and forms part of the local hydrological environment and cultural landscape. While StCronan's Well does not form part of the mapped EPA river network and does not provide surface water flow to downstream watercourses, it represents a sensitive local water feature whose hydrological regime is influenced by shallow groundwater conditions rather than surface runoff processes.

Refer to Figure 1-1 and 1-2 below respectively, for the regional and local hydrological environment in the context of the Proposed Development.

Figure 1-1. Regional Hydrological environment (EPA, 2026)

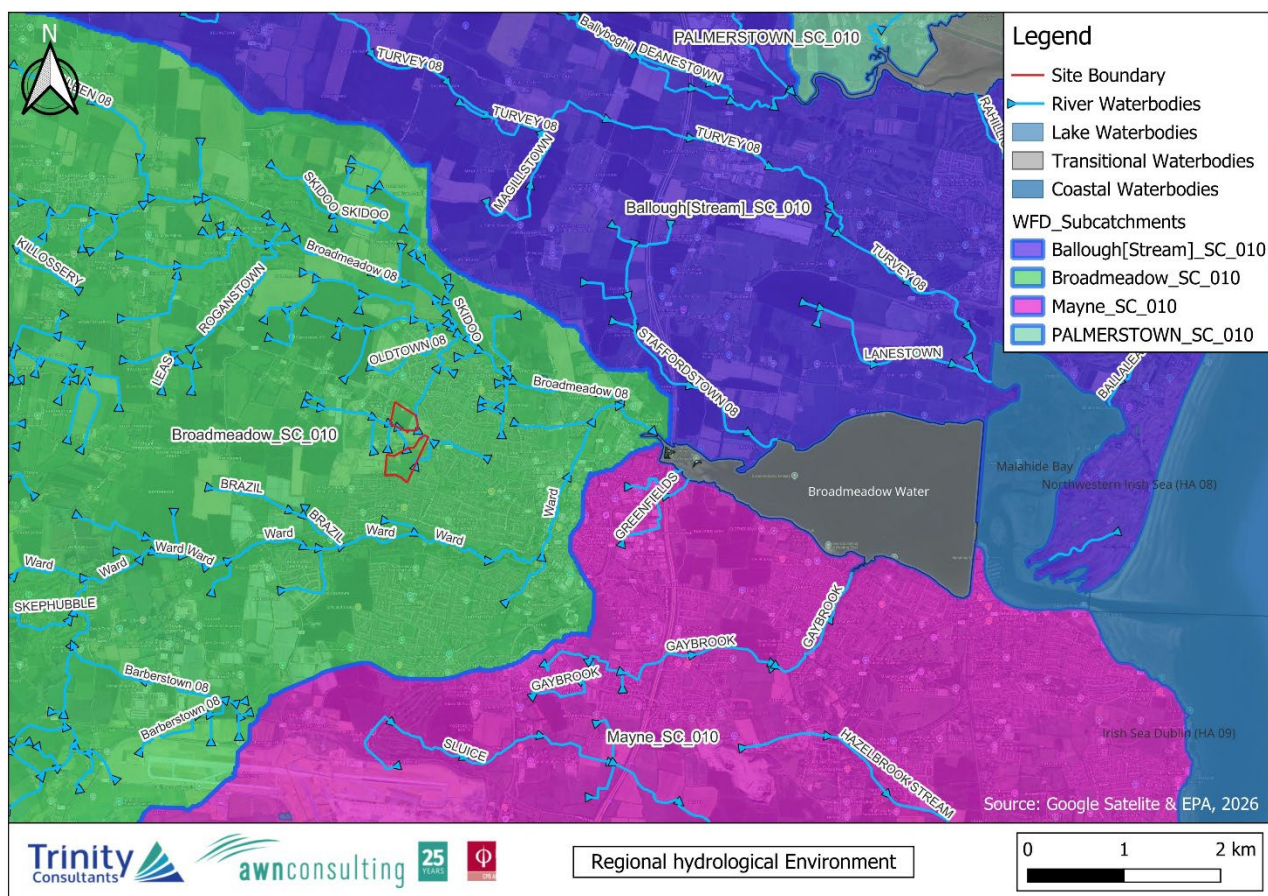
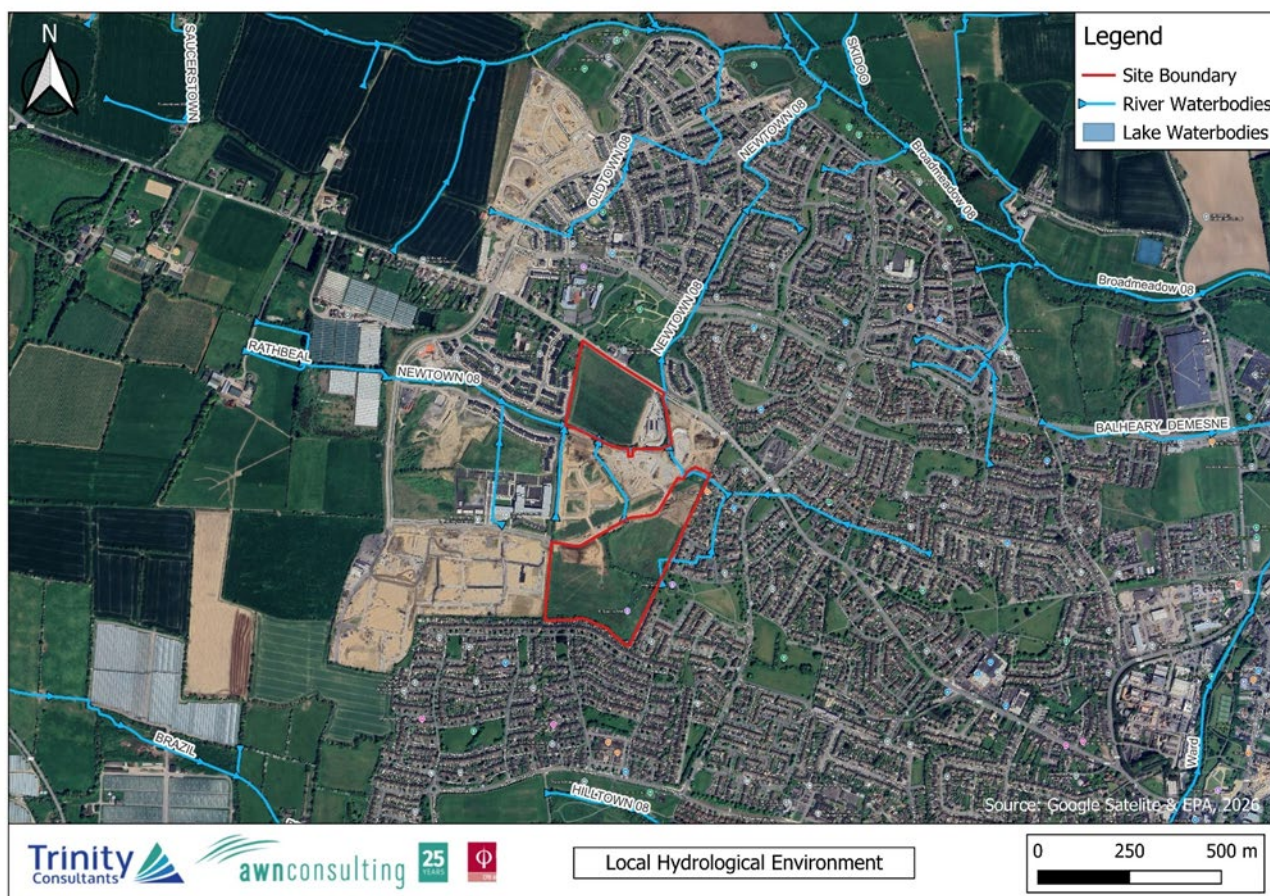


Figure 1-2. Local Hydrological Environment (EPA, 2026)



1.4 Description of Current and Proposed Drainage

Existing and Proposed Surface Water Drainage

There is no existing formal surface water drainage system within the Proposed Development i.e. the southern and northern parcels.

A new, fully separated surface water drainage network is proposed for Phase 2, designed in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and Fingal County Council requirements. The network discharges to the receiving system that flows beneath Rathbeale Road toward the Broadmeadow River, consistent with the established drainage regime through the Phase 1 lands currently under construction (Planning Ref. LADP/002/24).

Discharge rates will be controlled to QBAR (greenfield equivalent) for each catchment using Hydro-Brake (or similar) flow control devices, with attenuation provided through detention basins and underground stone or tank storage. Design parameters include SAAR = 770.8 mm, M5-60 = 15.2 mm, $r = 0.277$, a 20% climate-change allowance, and 10% urban creep. Runoff coefficients of 0.90 for roofs and roads, 0.50 for permeable paving, 0.10 for gardens and 0.47 for public open spaces have been adopted. Finished Floor Levels are set a minimum of 500 mm above the 1% AEP (+CC) drainage level in accordance with GDSDS Level of Service criteria.

The proposed drainage strategy is SuDS-led and incorporates permeable paving, rain gardens and bioretention systems (including engineered tree pits), swales with dropped-kerb inlets and check dams where required, and a combination of detention basins and underground attenuation to accommodate the 1:100-year (+CC) event. Water-quality protection is provided through distributed SuDS treatment and Class 1 petrol interceptors at outfalls. This represents a considerable improvement over the current

agricultural drainage regime and ensures controlled discharge, enhanced water quality, biodiversity support and alignment with FCC Green/Blue Infrastructure guidance.

For detailed information on the operational surface water strategy, attenuation design, SuDS components and pollution control, refer to the Infrastructure Report (AKM Design Group, 2026) and Drawing Number: 5051-AKM-XXXX-XX-DR-C01-300001 (Proposed Storm and Foul Drainage – General Layout, AKM Design Group, 2026) submitted as part of the planning application.

Existing and Proposed Wastewater Drainage

The Proposed Development is currently an undeveloped greenfield area with no existing foul or wastewater services in place. There is no connection to public sewer infrastructure, nor are there any on-site wastewater treatment systems or private drainage arrangements currently serving the Proposed Development lands.

The proposed foul drainage network for Phase 2 will be fully integrated with the Phase 1 foul system which was designed to accommodate Phase 2 flows. The northern parcel of approximately 53 units will discharge by gravity to the Phase 1 on-site pump station, which is already under construction (Planning Ref. LADP/002/24), and a foul gravity pipe bridge will facilitate this connection. The southern areas drain by gravity via four connections into the Phase 1 foul network, which ultimately ties into the public foul system at Cronan's Well Estate.

A Pre-Connection Enquiry (CDS25003155) received Confirmation of Feasibility on August 26th, 2025, confirming that the public foul network has sufficient capacity for the Proposed Development subject to completion of the Glen Ellen Road storage-tank upgrade, which is being advanced by a third party. The Swords Wastewater Treatment Plant (WWTP), operating under EPA licence D0024-01, has a peak hydraulic capacity of 60,750 m³/day (703.125 l/s), and the Proposed Developments peak foul effluent discharge of 10.81 l/s represents approximately 1.54% of this capacity. This volume is negligible in hydraulic terms and will not adversely impact WWTP performance or the downstream receiving waters in the Nanny-Delvin catchment. All foul water from the development will receive full treatment at Swords WWTP, ensuring no operational-phase pathway to the hydrological or hydrogeological environment.

For detailed information on the proposed foul water arrangements and design, refer to the Infrastructure Report (AKM Design Group, 2026) and Drawing Number: 5051-AKM-XXXX-XX-DR-C01-300001 (Proposed Storm and Foul Drainage – General Layout, AKM Design Group, 2026) submitted as part of the planning application.

Flood Risk

A Site-Specific Flood Risk Assessment (FRA) has been prepared by AKM Design Group and is included within the Infrastructure Report (Document Ref: 25051-AKM-XXXX-XX-RP-C01-100001, 2026) submitted as part of the planning application.

The FRA concludes that the entire Proposed Development site is located within Flood Zone C, indicating a low probability of fluvial or coastal flooding, and therefore appropriate for residential development without the need for a Development Management Justification Test. No part of the Proposed Development footprint lies within Flood Zone A or B under either present-day conditions or high-end future climate-change scenarios.

Fluvial flood risk associated with the Broadmeadow 08 river is limited to areas north of the Proposed Development at Newtown and Oldtown, where CFRAM mapping identifies Flood Zones A and B adjacent to the river corridor. The nearest of these areas, at Oldtown, is approximately 1.1 km north of the Proposed Development.

Coastal flooding is not a credible mechanism for this Proposed Development given its inland location, approximately 5.8km west of Malahide Bay, and the CFRAM coastal flood mapping confirms no coastal flood extents reaching the subject lands even under extreme sea-level-rise scenarios.

Pluvial flood mapping also indicates no mapped pluvial flood extents within the development lands, with only minor temporary surface-water ponding occasionally recorded along the surrounding road network during intense rainfall events.

Groundwater flood risk is similarly low, as evidenced by GSI groundwater flood mapping and the cohesive, low-permeability glacial till strata identified during ground investigation. There are therefore no credible flood pathways that could materially affect the proposed development.

Historical flood records available on the OPW Floodinfo.ie platform indicate that no past flood events have been recorded within the immediate vicinity of the Proposed Development. The nearest historical flooding incidents include an event at Pine Grove Park, Swords (1982), located approximately 650 m to the east, and an event on Balheary Road (2005), located approximately 1.2 km northeast. Neither of these historic floods is associated with a mechanism relevant to the Proposed Development, as both occurred within localised areas of lower-lying topography and closer proximity to watercourses.

The incorporation of SuDS measures within the drainage design such as permeable paving, bioretention areas, swales, and controlled attenuation storage, provides an additional layer of protection by ensuring runoff is managed sustainably and peak flows are restricted to greenfield equivalent discharge rates (QBAR). These measures ensure that the development will not increase flood risk, either within the Proposed Developments site or downstream, and will effectively manage any residual pluvial or surface-water risk.

Overall, the FRA concludes that the Proposed Development lands are suitable for residential development from a flood-risk perspective, with no significant fluvial, coastal, pluvial, or groundwater flood risks identified, and no requirement for a Justification Test.

2. ASSESSMENT OF BASELINE WATER QUALITY, RIVER FLOW, WATER BODY STATUS, GEOLOGY & HYDROGEOLOGY

A reliable Conceptual Site Model (CSM) requires an understanding of the existing hydrological and hydrogeological setting. This is described below for the Proposed Development site and surrounding hydrological and hydrogeological environs.

2.1 Hydrological Catchment Description

The Proposed Development site lies within the Nanny-Delvin WFD catchment (catchment ID: 09) and the Broadmeadow_SC_010 WFD sub catchment (EPA 2026) which is managed by Fingal County Council. Refer to Section 1.3 above for more detailed information on the hydrological environment at the Proposed Development site and wider downstream environment.

The Broadmeadow_040 WFD river waterbody (which hosts the aforementioned river waterbodies; refer to Section 10.3.2.2) is classified as having a 'Poor' status for the WFD period 2019–2024, with a current risk score 'At Risk' of not achieving good status for the 3rd Cycle i.e. by 2027. Its overall ecological status is poor, reflecting deficits in biological and habitat quality, while chemical status also fails to meet good standards, likely due to elevated priority pollutants common in urban catchments. Hydromorphology is significantly impacted by altered channel morphology and habitat degradation, contributing to the poor ecological outcome. The main pressures on Broadmeadow_040 are associated with agriculture and Hydromorphology sources, particularly farmyards and channelisation, respectively, as reported in the WFD Cycle 2 Sub-Catchment Assessment Report on the Broadmeadow_SC_010 Sub-Catchment (EPA, December 2018). These findings are consistent with the Cycle 3 Nanny-Delvin Catchment Report (HA08, EPA, May 2024), which highlights ongoing concerns about nutrient enrichment and hydromorphological alterations.

The Broadmeadow Water transitional waterbody is classified as having a 'Moderate' status for the WFD period 2019–2024, with a current risk score 'At Risk' of not achieving good status for the 3rd Cycle i.e. by 2027. Its overall ecological status is moderate, reflecting deficits in biological and habitat quality, while chemical status also fails to meet good standards, likely due to elevated priority pollutants common in urban catchments. The main pressures on Broadmeadow Water transitional waterbody are associated with domestic wastewater and urban wastewater sources, particularly wastewater discharge and agglomeration PE > 10,000, respectively, as reported in the WFD Cycle 2 Sub-Catchment Assessment Report on the Broadmeadow_SC_010 Sub-Catchment (EPA, December 2018). These findings are consistent with the Cycle 3 Nanny-Delvin Catchment Report (HA08, EPA, May 2024), which highlights ongoing concerns about nutrient enrichment and organics associated with urban wastewater and DWTS.

Malahide Bay coastal waterbody is classified as having a 'Moderate' status for the WFD period 2019–2024, with a current risk score 'At Risk' of not achieving good status for the 3rd Cycle i.e. by 2027. Its overall ecological status is moderate, reflecting deficits in biological and habitat quality, while chemical status achieved a high status. The main pressures on Malahide Bay coastal waterbody are associated urban wastewater sources as reported in the Cycle 3 Nanny-Delvin Catchment Report (HA08, EPA, May 2024), which highlights ongoing concerns about nutrient enrichment and organics associated with urban wastewater.

According to the Infrastructure Report prepared by AKM Design Group (2026), the Proposed Development will not generate any additional uncontrolled stormwater runoff compared with the existing greenfield conditions, as all surface-water discharges will be restricted to QBAR (greenfield equivalent) for each catchment through the use of Hydro-Brake controls and SuDS-based attenuation systems. The surface water drainage network has been designed to fully attenuate runoff up to the 1-in-100-year storm event including a 20% climate-change allowance, ensuring that outflows do not exceed greenfield discharge

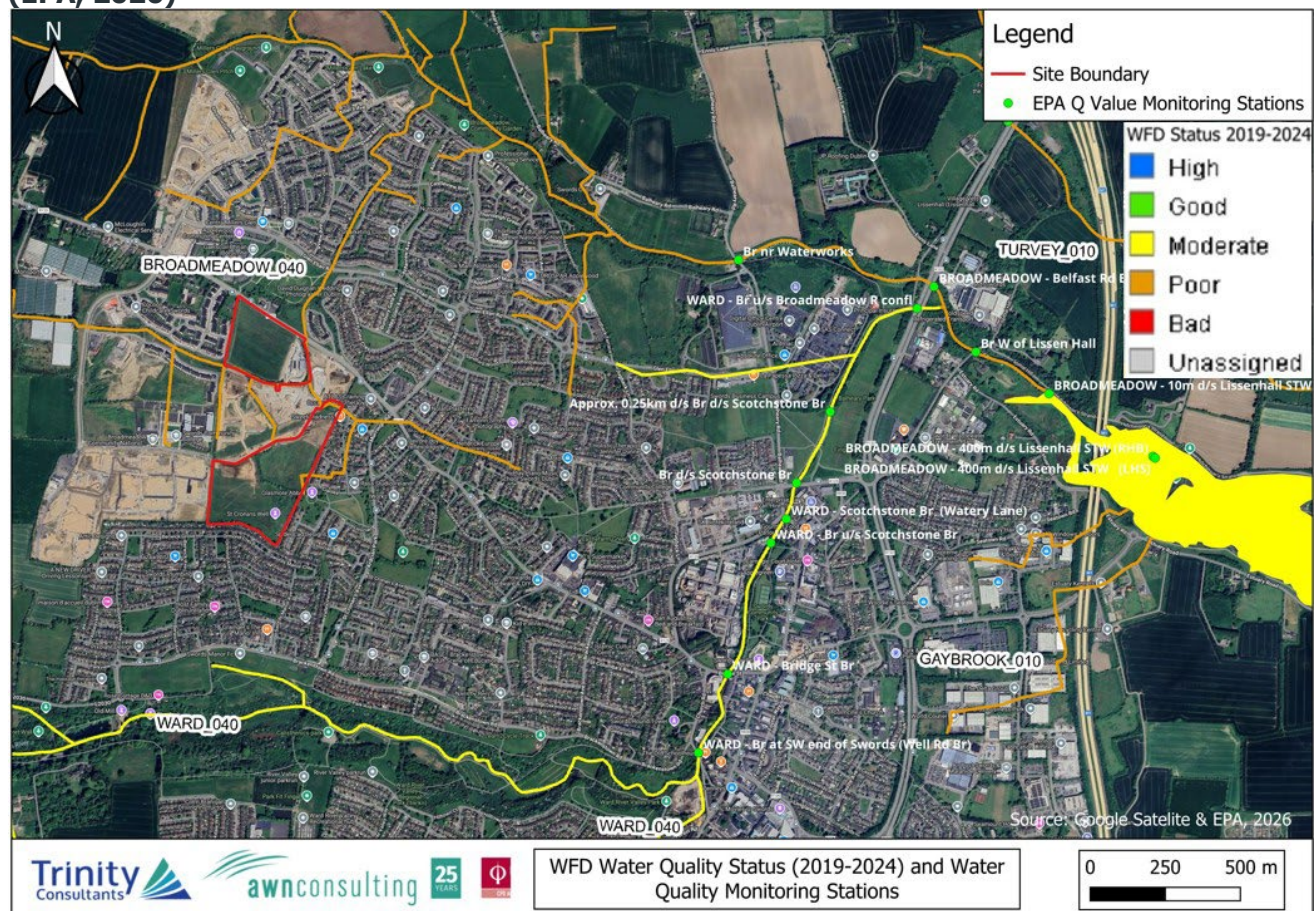
rates and therefore do not contribute to downstream flood risk or increased hydraulic loading of the receiving system.

It should be noted the only measurable contribution to the public network from the Proposed Development arises from foul sewage. As detailed in the Infrastructure Report (AKM Design Group, 2026), the peak foul effluent discharge from the Proposed Development is 10.81 l/s, which represents approximately 1.54% of the available peak hydraulic capacity at Swords Wastewater Treatment Plant (WWTP), which operates at 60,750 m³/day (703.125 l/s) as reported in the Swords WWTP AER (2024). This level of loading is considered negligible in hydraulic terms and will not adversely affect the operational performance of Swords WWTP or the receiving waters in the Nanny–Delvin catchment.

Accordingly, with surface water restricted to greenfield rates and foul discharge representing a small fraction of the available WWTP capacity, the Proposed Development will have no measurable impact on downstream water quality, flood risk, or wastewater treatment operations.

The WFD surface waterbody status (WFD Period: 2019-2024) of the Broadmeadow_040 WFD river waterbody and the Broadmeadow Water transitional waterbody is presented in Figure 2-1 below.

Figure 2-1. Surface Waterbody Status (WFD: 2019-2024) and EPA River Monitoring Stations (EPA, 2026)



2.2 Hydrogeology

2.2.1 Aquifer Classification

The GSI has devised a system for classifying the bedrock aquifers in Ireland. The aquifer classification for bedrock depends on a number of parameters including, the area extent of the aquifer (km²), well yield (m³/d), specific capacity (m³/d/m) and groundwater transmissivity (mm³/d). There are three main

classifications: regionally important, locally important and poor aquifers. Where an aquifer has been classified as regionally important, it is further subdivided according to the main groundwater flow regime within it. This sub-division includes regionally important fissured aquifers (Rf) and regionally important karstified aquifers (Rk). Locally important aquifers are sub-divided into those that are generally moderately productive (Lm) and those that are generally moderately productive only in local zones (LI). Similarly, poor aquifers are classed as either generally unproductive except for local zones (PI) or generally unproductive (Pu).

The GSI classifies the principal aquifer types in Ireland as:

- ▶ **Bedrock Aquifer**
 - Rkc – Regionally Important Aquifer – Karstified (conduit)
 - Rkd – Regionally Important Aquifer – Karstified (diffuse)
 - RK – Regionally Important Aquifer – Karstified
 - Rf – Regionally Important Aquifer – Fissured bedrock
 - Lm – Locally Important Aquifer – Bedrock which is Generally Moderately Productive
 - Lk – Locally Important Aquifer – Karstified
 - LI – Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones
 - PI – Poor Aquifer – Bedrock which is Generally Unproductive except for Local Zones
 - PU – Poor Aquifer – Bedrock which is Generally Unproductive
- ▶ **Gravel Aquifer**
 - Lg - Locally Important Aquifer - Sand & Gravel
 - Rg - Regionally Important Aquifer - Sand & Gravel

Presently, from the GSI (2026) National Bedrock Aquifer Map, the GSI classifies the bedrock aquifer beneath the Proposed Development site as a 'PI - Poor Aquifer – Bedrock which is generally unproductive except for local zones'. This aquifer type typically has low permeability and limited groundwater storage, providing only small, localised yields. Groundwater flow is generally restricted to isolated fractures, meaning that connectivity, recharge potential, and the potential for contaminant migration are all low and confined to very local scales.

The northern parcel of the Proposed Development is bounded to the north by a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones (LI)'. These aquifers can support smaller public or group water supplies but still exhibit limited permeability and low regional connectivity. The potential for significant vertical or lateral migration of groundwater within this aquifer is limited to local zones of enhanced fracturing.

2.2.2 Aquifer Vulnerability

Groundwater vulnerability is an indication of how easily the aquifer can become contaminated by human activity. It is dependent on the thickness and permeability of the overlying soils and depth to the water table. For example, a bedrock aquifer with minimal thickness of overburden or with a thin layer of permeable overburden will be more vulnerable to contamination than a bedrock aquifer which has a thick layer of low permeability overburden. Extreme groundwater vulnerability is also associated with karst landforms as these are a direct pathway for water and contaminants to enter the aquifer from the surface.

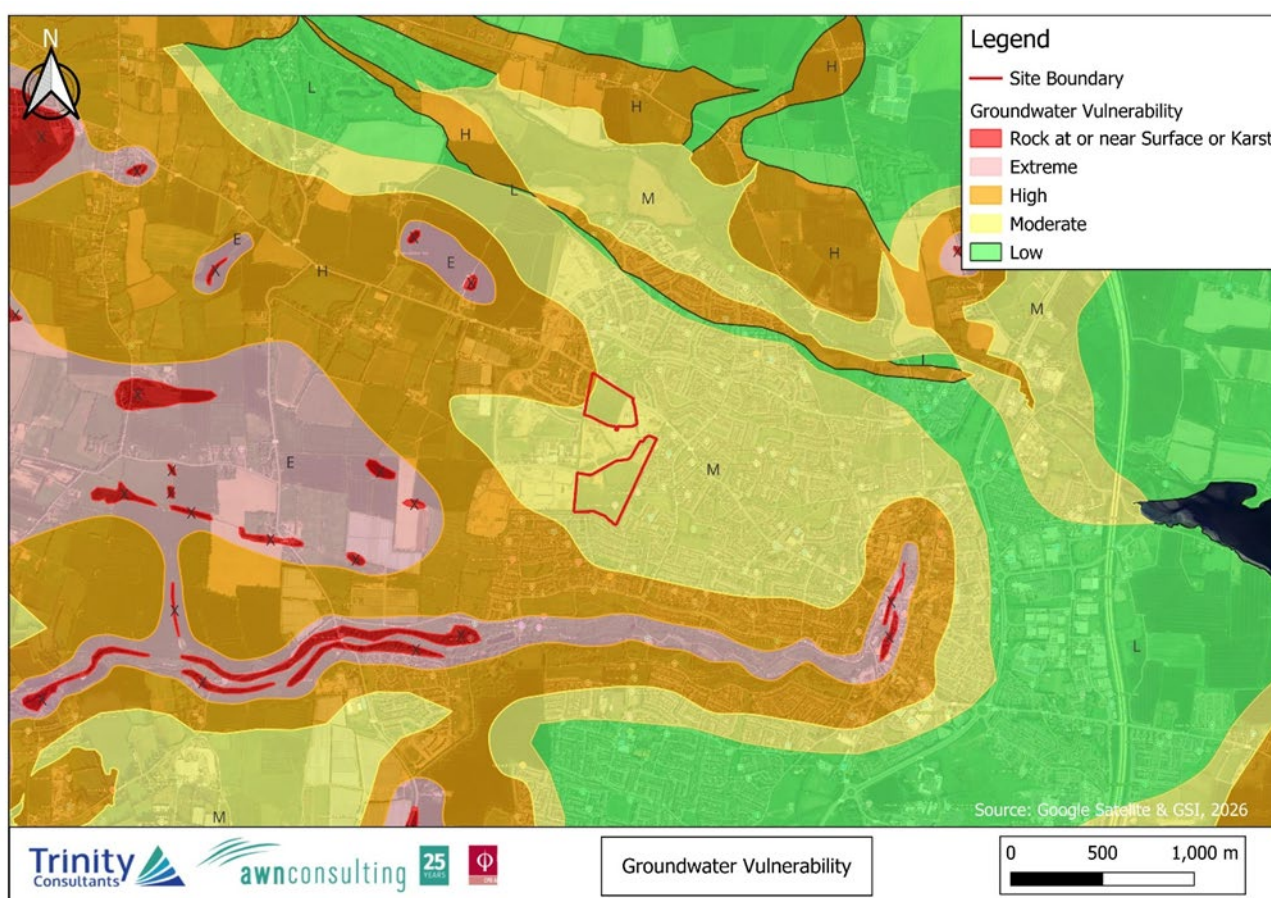
The GSI (2026) mapping indicates that the Proposed Development is underlain by areas of 'Moderate' (M) groundwater vulnerability. Within Carboniferous Limestone till, this typically corresponds to overburden depths in the region of approximately 3-10 m, where the cohesive, generally low permeability till provides a moderate degree of protection to the underlying aquifer. To the immediate west of the northern plot, an area of 'High' (H) vulnerability is mapped, generally associated with shallower overburden depths of

less than 3 m, where thinner or more permeable till deposits offer reduced natural protection and increase susceptibility to contamination arising from human activities.

Groundwater vulnerability is governed by the thickness and permeability of subsoils overlying the bedrock aquifer. As the Proposed Development is largely underlain by limestone till, which typically affords moderate protection due to its clay-rich, low-permeability characteristics, the mapped classifications are considered appropriate. Given the localised variations in till thickness, these vulnerability ratings may be conservative in places. Considering the overburden depths, groundwater is not considered a sensitive receptor in this context.

Refer to Figure 2-2 below for the GSI's mapped groundwater vulnerability in the context of the Proposed Development.

Figure 2-2. Aquifer Vulnerability Map (GSI, 2026)



2.2.2.1 Site Investigation

The recent ground investigation carried out by Site Investigations Ltd (SIL) in April 2024 confirms that the site is predominantly underlain by cohesive glacial till, with ground conditions characterised by firm brown to very stiff black slightly sandy, slightly gravelly silty clay with high cobble content. Subsoil depths extend to the full depth of investigation, with trial pits and boreholes advanced to between 6.70m BGL and 8.80m BGL, where drilling refusal was encountered on large cobbles or possible boulders. Bedrock was not encountered at any location, indicating that the rockhead lies deeper than previously indicated by GSI mapping.

Only localised Made Ground was identified at four trial pit locations (generally <0.70 m BGL, up to 1.80m BGL at TP004), consisting of slightly sandy, slightly gravelly silty clay containing small quantities of

anthropogenic material. The cohesive glacial till beneath this Made Ground is of low permeability, and laboratory testing confirmed high fines content (41–45%) and low to intermediate plasticity, typical of dense, protective till deposits.

Although groundwater ingress was recorded in several trial pits, it was variable and generally shallow, occurring between 0.40 m BGL and 3.50 m BGL, reflecting perched or discontinuous groundwater conditions typical of clay-rich tills. Groundwater ingress was also observed in all boreholes, with depths ranging from 2.50 m BGL (BH10) to 3.50 m BGL (BH09). Across the 46 trial pits, ingress rates ranged from slow seepage to rapid inflows, further indicating localised pockets of perched groundwater rather than a continuous or well-developed groundwater horizon. No significant or sustained flowing groundwater horizons were encountered.

These findings indicate that actual groundwater vulnerability at the site is lower than suggested by GSI mapping, as the presence of thick, low-permeability cohesive till provides natural attenuation and protection to the underlying aquifer. The absence of bedrock encounters and the cohesive nature of the subsoil further support this interpretation.

Refer to Chapter 9 – Land, Soils and Geology of the EIA for further detail on the ground conditions and geological environment encountered on site. Additional supporting information, including the full Mooretown Phase 2 Site Investigation Report (July 2024), is provided in the Infrastructure Report (Document Ref: 25051-AKM-XXXX-XX-RP-C01-100001), prepared by AKM Design Group for Fingal County Council (2026), where the complete investigation data is presented in Appendix B.

2.2.3 Local Hydrogeological Features

There is no evidence of karstification within the Proposed Development site or its wider vicinity. The underlying bedrock aquifer is classified as a 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones', overlain by thick, cohesive limestone-derived glacial tills, which substantially limit rapid groundwater flow and preclude the development of karst features. Groundwater at the site occurs predominantly as shallow, perched and discontinuous seepage within the till deposits, consistent with the findings of the Site Investigation (SIL; April 2024) and regional hydrogeological mapping.

A review of the Geological Survey of Ireland (GSI) Karst, Spring and Well databases indicate the presence of one (1) no. locally significant natural spring within the Proposed Development boundary, St Cronan's Well (Record of Monuments and Places Code: DU011-018), located in the south-eastern corner of the southern parcel of the site. St Cronan's Well is documented as a holy well fed by a natural spring, with groundwater emerging via percolation through overlying natural subsoils, rather than through karst conduits or fractured bedrock pathways. The spring is therefore interpreted as being supported by shallow, perched and discontinuous groundwater seepage within the limestone-derived glacial tills that overlie the underlying 'PI – Poor Aquifer', consistent with the findings of the site investigation and regional hydrogeological mapping. There is no evidence to suggest that the well is hydraulically connected to deeper bedrock groundwater systems or to any regionally important aquifer.

2.3 Bedrock Geology & Superficial Deposits

2.3.1 Bedrock Geology

Inspection of the GSI and EPA (2026) datasets indicates that the Proposed Development is underlain predominantly by the Tober Colleen Formation (Rock Unit Code: CDT0BE). This formation is described by the GSI as comprising calcareous shale and limestone conglomerate. The Tober Colleen Formation typically consists of thinly bedded calcareous mudstones and silty shales interbedded with limestone rich conglomeratic layers. These rocks generally display moderate to low strength, moderate weathering susceptibility, and can contain thin, weaker shale horizons that influence geotechnical behaviour. The

calcareous content often results in locally elevated hardness within limestone rich bands, while shale layers may break down more readily when exposed.

A small portion of the north-western area of the northern parcel is underlain by the Malahide Formation (Rock Unit Code: CDMALH), comprising argillaceous bioclastic limestone and shale. This formation is characterised by fine-grained limestones containing fossil fragments (bioclasts) interbedded with shale units. The limestone elements tend to be competent, moderately strong, and relatively resistant to weathering, whereas the shale layers are softer, more fissile, and may degrade when exposed. The interbedding of lithologies can lead to variable rock quality and anisotropic engineering behaviour, particularly where shale partings create preferential planes of weakness.

The GSI Bedrock Mapping Database identifies a geological structural fault traversing the most north-western portion of the northern parcel, corresponding to the boundary between the Tober Colleen and Malahide Formations. Such structural features can influence rock mass integrity, fracture density, and local groundwater movement, although their significance is typically dependent on orientation, continuity, and degree of displacement. No evidence of bedrock outcrop or exposed rock faces was observed within the site, indicating that bedrock is overlain by a substantial thickness of glacial till and alluvial deposits, consistent with the mapped Quaternary sediments in the area.

2.3.1.1 Site Investigation

The ground investigation completed by Site Investigations Ltd (SIL) in April 2024 did not encounter bedrock within any of the cable percussive boreholes advanced on the site. Boreholes were terminated at depths ranging from 6.70 m to 8.80 m BGL due to obstructions interpreted as large cobbles or possible boulders, rather than confirmed bedrock. No competent rock was proven at any location, and no rotary coring was undertaken as part of this investigation.

Across all boreholes, the strata encountered comprised cohesive glacial till principally slightly sandy, slightly gravelly silty CLAY with high cobble and low boulder content extending to the full depth of excavation. These deposits, which became stiff to very stiff with increasing depth, are characteristic of the regional limestone-derived tills that overlie bedrock in north Co. Dublin. The presence of frequent cobbles and occasional suspected boulders is consistent with tills derived from Carboniferous limestone bedrock and suggests that the underlying rockhead is irregular and likely deeper than the maximum investigation depth.

No limestone fragments, intact rock cores, or bedrock refusal were recorded; instead, borehole termination was caused by drilling obstruction rather than competent rock. This indicates that the bedrock surface lies below 6.7-8.8 m BGL, deeper than the reach of the exploratory logs.

Groundwater ingress was recorded across the trial pits and boreholes at depths ranging from 0.40 m to 3.50 m BGL, but no distinct bedrock groundwater conditions (such as inflows through fractures) were observed, further supporting that the investigation did not intercept the rockhead.

Overall, the ground investigation results are consistent with regional GSI bedrock mapping, which identifies Carboniferous limestone bedrock beneath the site, but they also confirm that the rockhead was not reached during the intrusive works and is likely located deeper than 6.7-8.8 m BGL. The cohesive till profile encountered throughout all boreholes aligns with expectations for a site underlain by limestone-derived glacial sediments over bedrock.

Refer to Appendix B of the Infrastructure Report (Document Ref: 25051-AKM-XXXX-XX-RP-C01-100001), prepared by AKM Design Group for Fingal County Council (2026) for the complete Mooretown Phase 2 - Site Investigation Report (July 2024).

2.3.2 Soils and Subsoils

According to GSI/Teagasc (2026) Soil Mapping, the Proposed Development encompasses four (4) no. soil types distributed across the northern and southern land parcels. Both parcels are predominantly underlain by BminDW, classified as well-drained mineral soils. These soils typically exhibit good permeability, favourable infiltration capacity, and are generally well-suited for agricultural, landscape, and construction uses.

Localised areas of BminPD soils, representing poorly drained mineral soils, are mapped along the north-western portion of the southern parcel and the southern margin of the northern parcel. These soils tend to retain moisture for prolonged periods, are prone to seasonal waterlogging, and may require additional drainage measures or careful foundation design where encountered.

Alluvium (A) is mapped along the southern boundary of the northern parcel and immediately north of the southern parcel, following the course of the Newtown 08 river waterbody (refer to Chapter 10 of this EIAR). Alluvial soils typically comprise fine silts, sands, and organic-rich sediments deposited by fluvial processes. These materials are generally poorly consolidated, variable in strength, and may be susceptible to settlement.

To the east of the Proposed Development, Made Ground is present, associated with historic and ongoing residential developments. Made Ground can consist of reworked soils, imported fill, and construction debris, and often displays heterogeneous engineering behaviour.

The Quaternary geology of the area reflects the influence of Pleistocene glaciation followed by fluvial reworking during the Holocene. GSI/Teagasc (2026) mapping identifies three principal subsoil types within the Proposed Development:

- ▶ Till derived from limestones (TLs) underlies the entire southern parcel and extends into the south western and north western areas of the northern parcel. This glacial till typically comprises clay, silt, sand, and gravel, and is generally dense and of low to moderate permeability.
- ▶ Alluvium (A) occurs along the southern and eastern edges of the northern parcel and adjacent to the Newtown 08 river waterbody. These deposits are usually soft to firm, with fine grained, moisture sensitive characteristics and relatively low bearing strength.
- ▶ Gravels derived from limestones form the predominant subsoil unit in the central and northern portions of the northern parcel. These coarse grained deposits are typically well drained and highly permeable, allowing rapid groundwater movement.

2.3.2.1 Site Investigation

Based on the completed geotechnical investigation for the Proposed Development carried out by Site Investigations Ltd (SIL) in April 2024 on behalf of Waterman Moylan, the recorded ground conditions are generally consistent with the soil and subsoil mapping provided by GSI/Teagasc (2026).

The ground conditions recorded in the site investigation closely align with the GSI/Teagasc mapping, but the SI data provides a far more detailed picture of the subsurface. The investigation confirmed that the site is dominated by cohesive glacial till, consisting of firm brown to very stiff black slightly sandy, slightly gravelly silty clay with high cobble and low boulder content, which is entirely consistent with the mapped limestone-derived till (TLs).

Localised Made Ground was identified only in four trial pits to depths of 0.7-1.8 m BGL, comprising silty clay with anthropogenic debris such as timber, brick, plastic, concrete and metal, which matches mapping of nearby developed areas but indicates that Made Ground is far less extensive on site than regional datasets may suggest.

The SI found no significant granular or gravel-dominated horizons, only gravel and cobbles embedded within the cohesive till, despite GSI mapping indicating more extensive gravelly subsoils in the northern parcel. This reflects typical glacial variability rather than a mapping inconsistency.

The laboratory results further reinforce the cohesive character of the site, with tills showing low to intermediate plasticity (PI 14-16%) and high fines content (41-45%), and SPT N-values increasing steadily with depth (11-18 at 1 m BGL; 23-35 at 3 m BGL), confirming dense, competent but low-permeability ground.

Although alluvium is mapped along the Newtown 08 river waterbody, the SI did not intercept any such deposits, likely because trial pits and boreholes were located outside the narrow alluvial corridor. Overall, the SI results provide a coherent and internally consistent ground model that broadly corroborates the GSI mapping while demonstrating that the site is more uniformly cohesive, less permeable, and less granular than the regional datasets imply.

Refer to Appendix B of the Infrastructure Report of the EIA (Document Ref: 25051-AKM-XXXX-XX-RP-C01-100001), prepared by AKM Design Group for Fingal County Council (2026) for the complete Mooretown Phase 2 - Site Investigation Report (2024).

3. CONCEPTUAL SITE MODEL

A conceptual site model (CSM) is developed based on a good understanding of the hydrological and hydrogeological environment, plausible sources of impact and knowledge of receptor requirements. This in turn allows possible Source Pathway Receptor (S-P-R) linkages to be identified. If no S-P-R linkages are identified, then there is no risk to identified receptors.

3.1 Assessment of Plausible Sources

Potential sources during both the construction and operational phases are considered. For the purposes of undertaking the potential of any hydrological/ hydrogeological S-P-R linkages, all potential sources of contamination are considered without taking account of any measures intended to avoid or reduce harmful effects of the proposed project (control/design measures) i.e. a worst-case scenario. Construction sources (short-term) and operational sources (long-term) are considered below.

3.1.1 Construction Phase

The following potential sources are considered plausible risk scenarios for the Proposed Development during the construction phase:

- ▶ Accidental Hydrocarbon or Chemical Spillage:
 - Hydrocarbons and hazardous substances will be stored in designated bunded areas; however, for the purposes of worst-case assessment, a complete failure of bunding is assumed. A spill scenario involving rupture of a 1,000-litre fuel tank to ground is considered. This represents a single, acute, short-duration event.
- ▶ Leakage from Construction Plant and Equipment:
 - Unmitigated minor leaks from machinery are considered. A worst-case leakage volume of 300 litres of hydrocarbons is assumed as a once-off event, prior to implementation of any containment or response measures.
- ▶ Run-off Containing Cementitious Materials:
 - Wet concrete works may generate alkaline wash-water with elevated pH. As such activities are intermittent, the worst-case is represented by a short-term localised release of untreated cement wash-water during periods of concrete placement or finishing.
- ▶ Run-off Containing Suspended Solids or Contaminants During Earthworks:
 - Site excavations can mobilise soil fines, natural sediments, and trace contaminants (e.g. hydrocarbons) if left uncontrolled. Although ground investigations (SIL, April 2024) did not identify any contamination within the natural cohesive tills, unmanaged run-off during excavation works could generate elevated suspended-solid loads. This is treated as an intermittent short-term source under a hypothetical CEMP failure.
- ▶ Dewatering Requirements:
 - Ground investigation (SIL, April 2024) confirms the presence of low-permeability glacial tills, indicating no requirement for significant or long-term dewatering during excavations. Any minor ingress is expected to be slow and manageable and therefore does not represent a substantial pollution source.

3.1.2 Operational Phase

The following sources are considered plausible during operation i.e. post construction:

- ▶ Absence of Bulk Chemical Storage:
 - The completed development will not include bulk storage of oils, chemicals or hazardous materials. As such, the potential for water-quality impacts from stored substances is considered negligible.
- ▶ Hydrocarbons from Vehicles in Parking Areas:

- Minor oil or fuel drips from private vehicles may occur. A worst-case scenario of 70 litres of hydrocarbon discharge from an individual vehicle is considered for assessment purposes, though the likelihood is extremely low given the scale of the development.
- ▶ Stormwater Run-off Managed via SuDS:
 - The operational drainage system incorporates a robust SuDS strategy, including interception storage, bioretention systems, permeable paving, swales and attenuation storage. All surface-water discharges are restricted to greenfield-equivalent QBAR rates, with extensive filtration, settlement and biodegradation provided within the SuDS train. No additional treatment systems are required owing to the low pollution hazard level associated with residential land uses and the intrinsic treatment provided by SuDS. These measures significantly reduce any potential impact on surface-water quality.
- ▶ Foul Water Discharge to Swords WWTP:
 - The Proposed Development will be fully serviced by a separate foul sewer network, discharging via the Phase 1 pump station to the public wastewater network and subsequently to Swords Wastewater Treatment Plant (WWTP, Licence D0024-01) for full treatment. The peak foul effluent from Mooretown Phase 2 is 10.81 l/s, equating to approximately 1.54% of the WWTP's reported peak hydraulic capacity of 703.125 l/s (AER 2024). Swords WWTP therefore has adequate operational capacity to accommodate the development. Treated effluent is discharged to the River Broadmeadow before entering the transitional waters of Broadmeadow Water and ultimately Malahide Bay. Given the negligible proportional loading and full treatment prior to discharge, no adverse impact on water quality or the receiving hydrological/hydrogeological environment is anticipated.

3.2 Assessment of Pathways

The potential pathways through which contaminants could migrate from the Proposed Development to downstream hydrological or hydrogeological receptors have been examined for both construction and operational phases.

As part of this assessment, all plausible routes for contaminant transport were reviewed based on the site's geological profile, groundwater vulnerability, existing hydrological connectivity, the presence of locally sensitive water features and the proposed surface-water and foul-water drainage arrangements. The impact assessment associated with these pathways is presented in Section 3.4 below.

3.2.1 Construction Phase

The potential for off-site migration of contaminants during the construction phase is considered inherently low, primarily due to the site's underlying geological conditions and the strict control of construction-phase water management.

All construction-phase water (including rainfall runoff, shallow groundwater seepage or any localised dewatering) will be required to pass through settlement or treatment measures prior to any authorised off-site discharge. This substantially reduces the likelihood of contaminant transport via surface water pathways.

Vertical migration of contaminants to the underlying calcareous shale and limestone conglomerate bedrock is minimised by the presence of a thick layer (approximately 6.6–8.7 m) of stiff to very stiff cohesive clay till across the site. Ground investigation works (Site Investigations Ltd., April 2024) confirm that these glacial tills are of very low permeability, providing substantial natural protection to the underlying aquifer. Consequently, the bedrock aquifer is not considered a sensitive receptor during the construction phase.

In addition, a localised hydrogeological feature, StCronan's Well (RMP DU011-018), is present within the south-eastern corner of the southern parcel. The well is fed by shallow, perched and discontinuous groundwater seepage within the overlying clay tills rather than by deep bedrock groundwater. Construction

activities will not involve sustained dewatering, abstraction, deep excavation or drainage interception capable of altering the groundwater regime supporting the spring. Any groundwater encountered during construction will be temporary, localised and rainfall-related, managed in accordance with the Construction and Environmental Management Plan (CEMP). As such, no credible construction-phase pathway exists whereby contaminants could migrate to St Cronan's Well.

There is, however, an indirect hydrological linkage between surface water runoff from the Proposed Development and the Broadmeadow 08 (Broadmeadow River) approximately 1.4 km downstream / 1.1 km north of the northern parcel. This pathway occurs exclusively via the engineered surface water drainage network, which conveys attenuated flows beneath Rathbeale Road before reaching the Broadmeadow system. Any construction-phase runoff entering this network will first pass through settlement systems and temporary SuDS measures, ensuring filtration and sediment removal prior to controlled discharge.

3.2.2 Operational Phase

During the operational phase, potential contaminant pathways are limited to controlled surface water discharges from the Proposed Development and the fully engineered foul drainage network.

Surface water runoff generated during operation will be managed through a SuDS-led, fully separated stormwater drainage system. Runoff will pass through multiple treatment stages—including permeable paving, bioretention systems, swales and detention storage—providing filtration, settlement and biodegradation prior to controlled discharge at QBAR greenfield-equivalent rates. This ensures that any hydrocarbons or suspended solids associated with residential land use cannot migrate rapidly or in untreated form into the receiving hydrological or hydrogeological environment.

There remains an indirect hydrological pathway between operational surface water runoff and the Broadmeadow 08 river c. 1.4 km downstream, which subsequently discharges to the Broadmeadow Water transitional waterbody (c. 4 km downstream) and to Malahide Bay coastal waterbody a further 3.5 km downstream. However, the combination of source control, treatment and attenuation within the drainage system ensures that operational-phase runoff poses a very low pollution risk to downstream surface water receptors.

The underlying bedrock aquifer remains hydraulically protected by the thick, low-permeability glacial till and is not considered a sensitive receptor during the operational phase. No groundwater abstraction, infiltration drainage or interception measures form part of the operational design.

With respect to St Cronan's Well, the operational drainage strategy does not introduce any pathway capable of altering shallow groundwater levels or flow directions supporting the spring. Untreated runoff is not permitted to infiltrate in the vicinity of the well, and local groundwater recharge patterns remain broadly unchanged. Accordingly, no operational pathway exists whereby contaminants could migrate to, or adversely affect, St Cronan's Well.

There is no direct pathway between foul sewage generated within the Proposed Development and any receiving surface water or groundwater body. The foul sewer network is fully separated from the stormwater system and conveys effluent via the Phase 1 pump station (Planning Ref. LADP/002/24) to the public wastewater network, ultimately discharging to Swords Wastewater Treatment Plant (WWTP) for full treatment. Treated effluent only is discharged to the Broadmeadow transitional waterbody in accordance with the WWTP's EPA licence (D0024-01). Given that the additional loading from the Proposed Development represents approximately 1.54 % of the WWTP's peak hydraulic capacity, and that the plant operates in compliance with its licence, no plausible pathway exists for untreated or harmful effluent to reach ecologically sensitive receptors.

3.3 Assessment of Receptors

The receptors considered in this assessment include the following:

- ▶ Underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones'.
- ▶ Underlying Swords Groundwater Body (GWB) (European Code: IE_EA_G_011).
- ▶ Broadmeadow_040 WFD River Waterbody (European Code: IE_EA_08B020800), including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries.
- ▶ Broadmeadow Water transitional waterbody (European Code: IE_EA_060_0100), located c. 4km downstream / c. 2.6 km east of the Proposed Development.
- ▶ Malahide Bay coastal waterbody (European Code: IE_EA_060_0000), located c. 7.5km downstream / c. 5.7 km east of the Proposed Development.
- ▶ Malahide Estuary SPA (Site Code: 004025).
- ▶ Malahide Estuary SAC (000205).
- ▶ Malahide Estuary Natural Heritage Area (NHA; Site Code: 000205).

Other Natura 2000 sites that are hydrologically connected to the Proposed Development; but are located at considerably greater distances from the Proposed Development, most notably the North-West Irish Sea SPA (Site Code: 00423) were excluded from further assessment. This is due to the substantial separation from the site, the very low magnitude of any potential contaminant loading associated with the realistic worst-case scenarios outlined in Section 3.1, and the significant dilution, dispersion and tidal mixing that occur throughout the hydrological pathway. As a result of these combined attenuation processes, there is no plausible mechanism by which construction or operational phase pollutants originating at the Proposed Development could reach the North-West Irish Sea SPA at concentrations capable of giving rise to any adverse effects.

3.4 Assessment of Source-Pathway-Receptor Linkages

An assessment has been carried out to determine whether any potential contaminant sources arising during the construction or operational phases of the Proposed Development could migrate through identified hydrological or hydrogeological pathways to reach downstream receiving waters or local sensitive receptors.

Surface water from the site drains indirectly towards the Broadmeadow08 river (c. 1.4km downstream) via the Newtown08 and Mooretown09 rivers, before flowing into the Broadmeadow Water transitional waterbody (c.4km downstream) and ultimately into the Malahide Bay coastal waterbody (c.7.5km downstream). The foul water pathway is fully engineered, with all wastewater conveyed to Swords Wastewater Treatment Plant (WWTP) for full treatment prior to discharge to the Broadmeadow Water transitional waterbody; accordingly, only treated effluent enters the receiving surface water environment.

The presence of StCronan's Well (RMP DU011-018) was also considered as part of the pathway assessment; however, the feature is not considered a receptor for the purposes of the Source-Pathway-Receptor (S-P-R) evaluation. The well is a naturally occurring, shallow spring fed by perched and discontinuous groundwater within low-permeability glacial tills, rather than a potable abstraction, regulated groundwater body, or downgradient receptor connected to site drainage pathways. Given the absence of sustained dewatering, groundwater abstraction, infiltration drainage or hydraulic connectivity between the Proposed Development and the spring, no viable contaminant pathway exists, and St Cronan's Well is therefore screened out as a receptor in the risk assessment.

Table 3-1 below summarises the plausible pollutant linkages (S-P-R) considered as part of the assessment and a review of the assessed risk is also summarised below.

3.4.1 Construction Phase

Construction-phase risk to groundwater is low. Ground investigations (SIL, April 2024) confirm that the Proposed Development site is underlain by a substantial 6.6–8.7 m layer of stiff to very stiff cohesive glacial till, which provides strong natural protection to the underlying 'PI – Poor Aquifer – Bedrock which is generally unproductive except for local zones' and the Swords Groundwater Body (IE_EA_G_011). As a result, there is no viable pathway for vertical percolation of hydrocarbons or silt-laden runoff to groundwater, and the groundwater body is not considered at risk of status deterioration.

With respect to StCronan's Well, the spring is fed by shallow, perched and discontinuous groundwater seepage within the overlying glacial tills, rather than by deep bedrock groundwater. Construction activities will not involve sustained dewatering, abstraction, drainage interception or deep excavation capable of altering this shallow groundwater regime. Any groundwater encountered during construction will be localised, short-term and rainfall-related only, managed through controlled sump pumping and settlement. Consequently, no credible contaminant pathway exists between construction-phase sources and StCronan's Well.

In terms of surface water pathways during construction, drainage ditches and minor tributaries within and adjacent to the Proposed Development site provide an indirect hydrological connection to the Broadmeadow_040 WFD river waterbody; however, the combination of low-permeability tills, perched groundwater, and the absence of direct channel crossings substantially reduces the capacity for contaminants to migrate off-site.

Should a worst-case scenario spill occur, such as a release of c. 1,000 litres of hydrocarbons or sediment-laden stormwater and enter the surface-water drainage network, this would be diluted to background levels (established as surface water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019), where natural settlement and attenuation processes within the drainage network would significantly reduce pollutant loading before any discharge from the Proposed Development site.

When transported downstream, any residual contaminants would undergo further dilution within the Broadmeadow_040 WFD river waterbody, followed by additional dispersion, mixing and tidal flushing within the Broadmeadow Water transitional waterbody, before being further attenuated within the Malahide Bay coastal waterbody. These hydrodynamic conditions ensure that contaminant concentrations would decline rapidly and would not pose a risk to downstream water quality or status.

3.4.2 Operational Phase

During the operational phase, pollution-source potential is extremely low due to the absence of bulk fuel or chemical storage. The only likely hydrocarbon source is a single-vehicle leak of approximately 70 litres worst case scenario.

Stormwater will be managed by a robust SuDS network comprising interception storage, permeable paving, bioretention systems and attenuation basins before discharge at greenfield run-off rates. Even if SuDS and interceptor functions are disregarded for the purposes of worst-case scenario modelling, the combination of low contaminant loading, infiltration and attenuation on site, and the extensive dilution available in the Broadmeadow_040 WFD river waterbody, Broadmeadow Water transitional waterbody and Malahide Bay coastal waterbody, ensures that concentrations would rapidly reduce to background levels and remain well below relevant surface-water quality standards i.e. there is no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019).

No operational-phase pathway exists by which surface water runoff or contaminants could migrate to StCronan's Well. The operational drainage design does not permit untreated runoff to infiltrate in the vicinity of the well, and no abstraction, drainage interception or groundwater level alteration is proposed. Accordingly, the shallow groundwater regime supporting the spring will remain unchanged.

Foul water from the Proposed Development will enter the public network and be pumped to Swords WWTP (D0024-01), which has sufficient hydraulic capacity to accommodate the additional peak discharge of 10.81 l/s recorded for the development. Following treatment, effluent is discharged to the Broadmeadow Water transitional waterbody. Even under a hypothetical scenario with no treatment at Swords WWTP, the peak hydraulic loading from the Proposed Development constitutes only 1.54% of WWTP capacity and would not be sufficient to measurably affect the WFD status of either the Broadmeadow Water transitional waterbody or downstream surface waters. With full treatment in place, no hydrological pathway exists for untreated or insufficiently treated wastewater to reach any receiving waterbody.

3.4.3 Cumulative and Worst-Case Scenarios

Cumulative risk scenarios, including simultaneous construction-phase hydrocarbon spill and sediment-laden discharge, have also been evaluated. The low contaminant mass, combined with on-site attenuation, controlled discharge arrangements and the very large dilution and tidal flushing capacity of the downstream receiving waters, ensures that such events would not generate perceptible impacts on the Broadmeadow_040 WFD river waterbody, the Broadmeadow Water transitional waterbody, the Malahide Bay coastal waterbody, or the associated Natura 2000 sites (Malahide Estuary SPA: Site Code; 004025 & Malahide Estuary SAC: Site Code; 000205).

The Proposed Development does not increase runoff volumes above greenfield rates and therefore does not introduce additional hydraulic loading to the downstream catchment.

Finally, even under wholly conservative assumptions that disregard mitigation measures and SuDS infrastructure, no significant hydrological or hydrogeological risks arise. Substantial natural protection from the cohesive till layer, limited contaminant loading, fully engineered drainage pathways and strong dilution, mixing and tidal processes ensure that no deterioration of surface water or groundwater status, and no impact on St Cronan's Well, is likely.

Table 3-1 below presents a summary of the risk assessment undertaken.

Table 3–1. Pollutant Linkage Assessment (without control measures)

Source	Pathways	Receptors Considered	Risk of Impact
Construction Impacts			

Source	Pathways	Receptors Considered	Risk of Impact
Unmitigated leak from an oil tank to ground/ unmitigated leak from construction vehicle (1,000 litres worst case scenario). Discharge to ground of runoff water with: ▶ High pH from cement processes i.e. concrete washout areas. ▶ Hydrocarbons from construction vehicles. ▶ Run-off containing a high concentration of suspended solids. Accidental discharge of wastewater from temporary welfare facilities (if required). Temporary connection to the public foul sewer (subject to licence), to accommodate vehicle washdown water following pollution control and attenuation measures. Surface water run-off discharged to the existing surface water sewer network, following treatment (settlement tanks/ponds, Class 1 Petrol Interceptors and spill control measures). Temporary connection to the public foul sewer (subject to licence), to accommodate vehicle washdown water following pollution control and attenuation measures.	Vertical migration through contaminated overburden to underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones'. Groundwater flow is generally restricted to isolated fractures, meaning that connectivity, recharge potential, and the potential for contaminant migration are all low and confined to very local scales, reducing potential for off-site lateral migration. The GSI (2026) mapping indicates that the Proposed Development is underlain by 'Moderate' (M) groundwater vulnerability, denoting depths of c. 3-10 m within Carboniferous Limestone till. Excavations will temporarily increase the aquifer vulnerability. According to site investigations carried out trial pits and boreholes advanced to between 6.70m BGL and 8.80m BGL, and bedrock was not encountered at any location, indicating that the rockhead lies deeper than previously indicated by GSI mapping.	Underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones'. Underlying Swords Groundwater Body (GWB) (European Code: IE_EA_G_011). Broadmeadow_040 WFD River Waterbody (European Code: IE_EA_08B020800), including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries. Broadmeadow Water transitional waterbody (European Code: IE_EA_060_0100), located c. 4 km downstream / c. 2.6 km east of the Proposed Development. Malahide Bay coastal waterbody (European Code: IE_EA_060_0000), located c. 7.5km downstream / c. 5.7 km east of the Proposed Development. Malahide Estuary SPA (Site Code: 004025). Malahide Estuary SAC (000205). Malahide Estuary Natural Heritage Area (NHA; Site Code: 000205).	No likely impact on the WFD status of the underlying 'PI - Poor Aquifer - Bedrock, which is generally unproductive except for local zones', or the underlying Swords Groundwater Body (GWB) (European Code: IE_EA_G_011), due to low potential loading, shallow depth of excavations (c. 3.93 m BGL), natural attenuation within the underlying subsoils (cohesive glacial tills; SIL, April 2024), depth to bedrock > c. 6.7-8.8m BGL (SIL, April 2024) and discrete nature of fracturing reducing off site migration.

Source	Pathways	Receptors Considered	Risk of Impact
	Indirect pathway to hydrological environment (Broadmeadow Estuary transitional waterbody) via temporary connection to the public foul sewer (subject to licence) which receives treatment at Swords WWTP; to accommodate vehicle washdown water following pollution control and attenuation measures.		No likely impacts on the WFD status of WFD surface waterbodies (Broadmeadow_040 WFD River Waterbody, Broadmeadow Water transitional waterbody and Malahide Bay coastal waterbody), due to low potential loading, natural attenuation within the underlying subsoils (cohesive glacial tills; SIL, April 2024), high level of dilution in the surface water sewer and hydrological environment (including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries), tidal flushing nature of Broadmeadow Water transitional waterbody and Malahide Bay coastal waterbody, and proposed temporary connection to the public foul sewer (subject to licence) receiving full treatment at Swords WWTP prior to discharge to Broadmeadow Estuary transitional waterbody.
Operational Impacts (Summary)			

Source	Pathways	Receptors Considered	Risk of Impact
Discharge to ground of hydrocarbons from roads, car parking, and hardstanding areas (70 litres worst case scenario). Discharge of foul water to Swords Wastewater Treatment Plant (WWTP; Active Licence Number: D0024-01). Discharge of surface water to the receiving surface water sewer that convey flows to the Broadmeadow 08 river (Broadmeadow_040 WFD river waterbody).	Indirect pathway to hydrological environment via proposed surface water drainage system that discharges to the surface water sewer network which conveys flows to the Broadmeadow 08 river; SuDS features include Permeable Paving, Rain Gardens / Bioretention Swales, Detention Basins & Underground Storage and Class 1 petrol interceptors. (Designed in accordance with full Sustainable Drainage Systems; SuDS), Indirect pathway to hydrological environment via connection to the public foul sewer (subject to licence) which receives treatment at Swords WWTP, prior to outfall at Broadmeadow Estuary transitional waterbody.	Broadmeadow_040 WFD River Waterbody (European Code: IE_EA_08B020800), including Newtown 08, Mooretown 09, Broadmeadow 08, and unnamed tributaries. Broadmeadow Water transitional waterbody (European Code: IE_EA_060_0100), located c. 4 km downstream / c. 2.6 km east of the Proposed Development. Malahide Bay coastal waterbody (European Code: IE_EA_060_0000), located c. 7.5km downstream / c. 5.7 km east of the Proposed Development. Malahide Estuary SPA (Site Code: 004025). Malahide Estuary SAC (000205). Malahide Estuary Natural Heritage Area (NHA; Site Code: 000205).	No perceptible risk due to the implementation of the design measures which includes SuDS and the use of interceptors along the drainage system. Furthermore, the extent of loading of potential contaminant, distance between the source and the receptors along with significant dilution in the drainage network will ensure any released hydrocarbons and other contaminants are at background levels (i.e., with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019).

Source	Pathways	Receptors Considered	Risk of Impact
			No perceptible risk to the hydrological environment following treatment in the EPA licenced Swords Wastewater Treatment Plant (WWTP; Active Licence Number: D0024-01). This foul loading will not adversely impact the operational capacity of Swords WWTP nor downstream surface water environments. According to the Swords Waste Water Treatment Plant (WWTP) Annual Environmental Report (AER, 2024), the plant's reported peak hydraulic capacity is 60,750 m³/day (703.125 l/s). The Proposed Development's peak foul effluent discharge of 10.81 l/s represents approximately 1.54% of this capacity. All foul water conveyed to Swords WWTP will receive full treatment prior to discharge, ensuring no operational-phase pathway/impacts to the hydrological or hydrogeological environment.

4. CONCLUSIONS

A conceptual site model (CSM) has been developed based on a detailed desk-based review of the Proposed Development and its surrounding hydrological and hydrogeological setting. The assessment has evaluated all plausible Source–Pathway–Receptor (SPR) linkages on a worst-case basis, explicitly excluding any design or mitigation measures that would ordinarily prevent or reduce pollutant migration. This approach ensures a robust and conservative evaluation of potential hydrological and hydrogeological risks.

During both the construction and operational phases, the Proposed Development maintains an indirect hydrological connection to downstream receiving waters via the stormwater drainage system and local hydrological environment (refer to Section 1.3). Surface water discharged from the Proposed Development will ultimately flow toward the Broadmeadow 08 river (Broadmeadow_040 WFD river waterbody), before entering the Broadmeadow Water transitional waterbody (c. 4 km downstream) and Malahide Bay coastal waterbody (c. 7.5 km downstream).

A separate indirect pathway also exists via the proposed foul-water drainage network, which conveys wastewater to Swords WWTP for full treatment prior to discharge to the Broadmeadow Water transitional waterbody. The future development's peak foul discharge of 10.81 l/s represents only 1.54% of the WWTP's peak hydraulic capacity, providing substantial assurance that it will not influence downstream water quality or the Water Framework Directive (WFD) status of receiving water bodies.

Even when disregarding all onsite design measures such as SuDS features, attenuation storage and Class 1 petrol interceptors, the assessment concludes that any potential contaminant load arising from construction or operational activities would be imperceptible at the point of discharge and would undergo significant dilution, mixing and tidal flushing within the Broadmeadow_040 WFD river waterbody, Broadmeadow Water transitional waterbody, and Malahide Bay coastal waterbody. These hydrodynamic characteristics ensure that any worst-case releases of hydrocarbons, suspended solids or other construction-related contaminants would rapidly attenuate to background levels.

The site's geological profile provides additional natural protection. The deep layer (6.6–8.7 m) of stiff to very stiff glacial till (SIL, April 2024) greatly restricts vertical contaminant migration, thereby protecting the underlying 'PI – Poor Aquifer – Bedrock which is generally unproductive except for local zones' and the Swords Groundwater Body (IE_EA_G_011). As a result, no likely hydrogeological pathway exists for contaminants to reach groundwater in quantities that could influence groundwater quality or status.

The assessment also considered the presence of StCronan's Well (RMP DU011-018). While the feature was acknowledged due to its local cultural significance, it is not considered a receptor for the purposes of the SPR assessment. The well is a naturally occurring shallow spring, supported by perched and discontinuous groundwater within low-permeability glacial tills, and is not hydraulically connected to site drainage pathways or deeper groundwater systems. Given the absence of sustained dewatering, groundwater abstraction, infiltration drainage or credible contaminant pathways, no scenario exists under which construction or operational activities could adversely affect the well.

Plausible cumulative scenarios, including a combined hydrocarbon release and sediment-laden runoff during construction, were also evaluated. Due to the low contaminant loading, on-site attenuation within the proposed drainage network, and the significant dilution capacity of downstream surface waters, no perceptible impact on water quality along the hydrological pathway would arise. Furthermore, the Proposed Development will not increase stormwater discharge above existing greenfield conditions, ensuring that no additional hydrological loading or overflow impacts are introduced into the downstream catchment.

Finally, and in line with good practice, appropriate and effective mitigation measures will be included in the construction design, management of construction programme and during the operational phase of the Proposed Development. These include the implementation of a Construction Environmental Management

Plan (CEMP), strict pollution-prevention measures, controlled refuelling practices, and an extensive SuDS drainage design incorporating interception storage, filtration, attenuation and hydrocarbon control. While these measures will further reduce the already-low risk of pollutant migration, the conclusions of this assessment do not rely on them.

Overall, the assessment concludes that there are no significant hydrological or hydrogeological pollutant linkages associated with the construction or operation of the Proposed Development which could result in a water quality impact which could alter the habitat requirements of the Natura 2000 sites located within the Broadmeadow Water transitional waterbody or Malahide Bay coastal waterbody.

No plausible scenario exists under which the Proposed Development would give rise to deterioration in groundwater or surface-water quality, nor would it alter the hydrological or hydrogeological WFD status of the Broadmeadow_040 WFD river waterbody, Broadmeadow Water transitional waterbody, Malahide Bay coastal waterbody or the underlying 'PI - Poor Aquifer - Bedrock which is generally unproductive except for local zones' and Swords groundwater body (GWB).

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