



LARCH HILL RESIDENTIAL DEVELOPMENT, COOLOCK, CO. DUBLIN

Natura Impact Statement

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Noteside Limited

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1 INTRODUCTION

1.1 Background

DNV was commissioned by Armstrong Fenton, on behalf of Noteside Limited to prepare a Natura Impact Statement (NIS) Report for a Proposed Residential Development, entitled 'Larch Hill', at Larch Hill Estate, Oscar Traynor Road, Dublin 17, hereafter referred to as 'Proposed Development' or 'Site', when referring to the application Site area. The AA Screening Report for this Proposed Development concluded that a degree of uncertainty exists in whether the Proposed Development could give rise to potentially significant effects on two European sites, namely:

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006)

An NIS has therefore been prepared for the Proposed Development. The purpose of this NIS report is to provide information for the relevant competent authority to carry out a Stage 2 Appropriate Assessment in respect of the Proposed Development.

1.2 Quality Assurance and Competence

All reporting and surveys have been carried out by qualified and experienced ecologists and environmental consultants BS (reporting) and EK, BMC and CM (surveying).

BS is a seconded Ecologist with DNV and has both a BSc (Hons) in Ecological and Environmental Sciences, and an MSc in Carbon Management from the University of Edinburgh. BS has experience in environmental and ecological data collection, field surveys and report writing and has previously undertaken projects in natural flood management and invasive species mapping. BS has experience in undertaking ecological desk studies, contributing to Appropriate Assessment (AA) Screening reports and has supported in the preparation of various ecological reports.

EK has a BSc in Psychology from the University of Maryland, USA and an MSc in Biodiversity and Conservation from Trinity College Dublin. His experience includes desktop research, literature-scoping review, and report writing as well as vegetation surveys, rare species surveys, and habitat mapping. EK has contributed to the preparation of several AA Screenings, Ecological Impact Assessments (EclA) and Environmental Impact Assessment Report (EIAR) Biodiversity Chapters, as well as Biodiversity Net Gain (BNG) Reports.

BMc is an Ecologist and experienced Ornithologist with 12 years of bird survey experience. BMC is a longstanding and active member of Bird Watch Ireland and has provided Ornithology survey work for ecological consultancies, e.g., vantage points surveys of gulls, terns, raptors, waders, and wildfowl; hinterland surveys of the above as well as riverine species; and breeding waders and country birds. BMC is highly experienced with all survey methodologies and with surveying all species groups of Irish birds and migrants.

CM is an Intern Ecologist with DNV and has a B.Sc. (Hons) in Zoology from University College Dublin. CM has experience in data collection, ecological modelling, report writing, animal handling, and field surveying, including invasive species sampling, animal behaviour monitoring, species identification, and habitat sampling. CM has partaken in projects across marine, freshwater and terrestrial systems, focusing on ecological impacts and invasive species, and has contributed to relevant reports and academic research.

1.3 Description of Proposed Development

1.3.1 Site Location

The Site of the Proposed Development is adjacent to Larch Hill House (Protected Structure – Ref. 2042) located within the Larch Hill estate, Coolock, Dublin 17. The Site is 100m from Oscar Traynor Road, which is located to the south of the Site. It is bounded to the north by “The Crescent” and to the south by “The View”, and contains a Protected Structure i.e., Larch Hill House (RPS Ref. No. 2042). The M50 motorway is approx. 440 metres (m) west of the Site.

The surrounding areas consist of urban residential housing estates. The Coolock Lane Park football field is located approx. 140m east and the river Santry is approx. 150m north of the Site. The Site location is presented in Figure 1.

1.3.2 Proposed Development Description

Noteside Limited intends to apply for permission for a residential development on a site located within the Larch Hill Estate, Coolock, Dublin 17. The Proposed Development consists of the demolition of an existing dwelling located to the north of the Protected Structure (c. 85 sq.m) and the construction of 38 no. dwellings. The Proposed Dwellings are accommodated in 2 no. new buildings as follows: (a) a 4 storey apartment building to the rear/north of Larch Hill House, comprised of 17 no. 1 bed apartments & 12 no. 2 bed apartments, and (b) a 1-3 storey duplex building to the west of Larch Hill House, comprised of 6 no. 1 bed apartments at ground floor level & 3 no. 3 bed duplex units at first and second floor level. The Proposed Development also includes a single storey bin & bike store / services building to the east of Larch Hill House. Access to the Proposed Development will be from Coolock Lane (the R104) via the Larch Hill estate and the existing vehicular entrance to Larch Hill House (located in the south-east of the Development). The Proposed Development includes external repair works to Larch Hill house, surface car parking, bin & bicycle storage, public and communal open spaces, hard & soft landscaping, boundary treatments etc. and all associated Site development works, on an overall Site area of c.0.65 hectares. Private open space is provided in the form of terraces at the ground floor level and balconies/terraces at the upper floor levels. See Figure 2 below for full Site Layout (DFK, 2025a).

1.3.2.1 Surface water

The surface water network will be designed and arranged in accordance with the requirements of the Greater Dublin Strategic Drainage Strategy (GDSDS) and the Global Development Research Centre (GDRC) in conjunction with “Recommendations for Site Development Works for Housing Areas” (current edition) published by the Department of Environment, Heritage and Local Government (DOEHLG) (DFK, 2025b).

The surface water runoff will be managed within the Site curtilage through the implementation of Sustainable Drainage Systems (SuDS) features, facilitating infiltration with **no discharge from the Site** (Figure 3). The surface water network will be laid as a separate system, and drains will be laid such as to minimise the risk of misconnections (DFK, 2025b).

An assessment of the various sustainable drainage systems that would be suitable for the Site has been carried out and the following measures were deemed to be suitable for the Proposed Development:

- Infiltration Trench,
- Bio-retention,
- Permeable Surfaces,
- Green roof

The tree survey completed onsite identified a number of existing trees which are to be retained and in turn the proposed drainage network has been designed to avoid the tree exclusion zones. The soakaway tests completed onsite confirmed infiltration is available and therefore infiltration will be prioritised as the method of controlling surface water runoff from the Proposed Development (DFK, 2025b).

The SuDS systems have been designed for a 1 in 100 year return period storm, as required by GDSDS “Regional Drainage Policies Vol 2 New Development”. Collectively the SuDS mechanisms have been designed to ensure that no flooding will occur within the Site up to the 30 year return period storm, as well as being able to deal with events up to a 1 in 100 year return period storm.

The proposed approach to the drainage design would be as follows:

1. **Block 1:** The surface water runoff from Block 1 will discharge to the proposed bio-retention areas positioned around the building.
2. **Block 2:** The surface water runoff from Block 2 will discharge to the proposed infiltration trenches located to the front and rear of the building. A green roof is included on 50% of roof area which will reduce the run-off to the infiltration trenches.
3. **Bicycle storage area:** The runoff from the bicycle and bin store will discharge to the proposed infiltration trenches located to the front of the building.
4. **Access road and car parking:** The access road and car parking on the south will be constructed using gravel enabling direct infiltration of surface water runoff.
5. **Car parking area** of the north will be constructed using permeable paving enabling direct infiltration of surface water runoff.
6. **The internal footpaths** will be constructed using a combination of permeable paving and concrete. The permeable paving will allow direct infiltration of surface water runoff, while the concrete footpaths will drain to adjacent landscaped areas where the run-off will infiltrate.
7. No works are proposed to the protected structure, Larch Hill House, as part of the Proposed Development and therefore the house has not been considered in the design. The existing services serving Larch Hill house itself are to be retained.

The GDSDS guidelines require the following main 4 criteria to be provided by the development’s surface water design.

Criterion 1: River Water Quality Protection

GDSDS Section 6.3.1.2.1 requires that no run-off should directly pass to the receiving watercourse for rainfall depths of 5mm and a treatment volume (Vt) be provided in order to prevent any pollutants or sediments discharging into watercourses / rivers, etc. for rainfall depths of 15mm.

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All the surface water generated on-site is managed within the curtilage through infiltration, with no surface water discharging from the Site.

Criterion 2 - River Regime Protection

As outlined above, the surface water generated on-site is managed within the curtilage through infiltration, with no surface water discharging from the Site. The SuDS features proposed have been designed to accommodate a 1 in-100-year storm event, in accordance with the requirements of the GDSDS Regional Drainage Policies, Volume 2: New Development. It can be seen the effective depth provided for the SuDS Features is less than the minimum depth required.

Criterion 3: Level of Service (flooding) for the Site

The SuDS mechanisms outlined within this report have been designed for a 1 in 100 year return period, as required by GDSDS "Regional Drainage Policies Vol 2 New Development". Collectively the SuDS mechanisms have been designed to ensure that no flooding will occur within the Site up to the 30 year return period, as well as being able to deal with events up to a 1 in 100 year return period, and no surface water will leave the Site.

A minimum freeboard of 500mm above attenuation top water level for a 1 in 100-year flood event has been provided to all building floor levels and planned flood routing for storms greater than 100-year level have been considered in design and development run-off will be contained within Site.

Criteria 4: River Flood Protection

It is proposed to meet the river flood protection requirements by providing infiltration storage equal to the long-term storage as per sub-criterion 4.2. The objective is to match the runoff volume discharged to the downstream receiving watercourse after completion to that which occurred prior to Proposed Development.

As outlined above all the surface water generated on-site is managed within the curtilage through infiltration, with no surface water discharging from the Site.

See Figure 3 for full surface water layout (DFK, 2025b; DFK, 2025c) and Figure 4 for full layout of SuDS features (DFK, 2025d).

1.3.2.2 Foul Drainage

The foul water network will be designed and arranged in accordance with the requirements of the GDSDS and the GDRC in conjunction with "Recommendations for Site Development Works for Housing Areas" (current edition) published by the DOEHLG (DFK, 2025b).

It is proposed to reuse the existing foul drainage connection from the Site to the existing foul sewer within Larch Hill Estate, located along the eastern boundary (DFK, 2025b).

It is proposed to reuse the existing foul drainage connection from the Site to the existing foul sewer within Larch Hill Estate, located along the eastern boundary. A pre-connection enquiry was submitted to Irish Water to confirm the feasibility of the proposed connection, in line with DCC Development Plan Policy SI1. The Irish Water reference

for the pre-connection enquiry is CDS25005425 (Uisce Éireann, 2025). The confirmation of feasibility is included in Appendix 1.

The foul water network will be laid as a separate system, and drains will be laid such as to minimise the risk of misconnections. The network will be installed and tested in accordance with Uisce Éireann standards and details. The discharge from the Proposed Development has been calculated to be to be 0.174 l/sec dry weather flow (DWF), with the 6DWF being 1.043 l/sec. The hydraulic loading data is based on a foul discharge of 165l/person/day in accordance with Irish Water Code of Practice for Wastewater Infrastructure, IW-CDS-5030-03, Rev.2 July 2020, CI 3.6 Hydraulic Design for Gravity Sewers, Pg. 45 (DFK, 2025b).

The area in which the Proposed Development is located is served by the Ringsend Wastewater Treatment Plant (WwTP). According to Irish Water (www.water.ie), Uisce Éireann completed construction of the infrastructure to treat the wastewater for a population equivalent of 2.1 million at the end of 2023. Following a period of testing and commissioning the upgraded assets are operational. As per the latest AER report (Irish Water, 2023), these works are continuing at present to deliver the capacity for a population equivalent of 2.4 million by the end of 2025. Given that the Proposed Development will not become operational until post-2025, it can be concluded that there will be sufficient hydraulic and organic capacity provided within Ringsend WwTP to facilitate the Proposed Development.

See Figure 3 for full foul water layout (DFK, 2025b; DFK, 2025d).

1.3.2.3 Landscape Plans

The landscaping plan for the Proposed Development includes a number of zones to be planted and constructed including a formal garden, including a formal lawn area framed by mature trees, a wildflower fruit garden, hardscaped areas and a play area (G&A, 2025a).

The landscape plan aims to retain as many trees and vegetation as possible. Tree removal has been carefully minimised, with a focus on preserving mature specimens, particularly along the southern and eastern edges, to maintain the Site's natural and ecological character.

The wild fruit garden will be planted with native fruit trees including Apple (*Malus domestica*) and Cherry (*Prunus avium*).

Remaining areas of planting within the centre of the Proposed Development Site will include shrubs, low evergreen planting including common herbs, and an ornamental grasses mix.

Additional planting around the periphery of the houses amongst the retained mature trees includes hedgerows of Irish native species mix including Hawthorn (*Crataegus monogyna*) and Hazel (*Corylus avellana*) as well as a wildflower meadow mix of Irish native wildflower species. Any additional trees planted onsite will be native species (G&A, 2025a).

See for Figure 5 for full landscape plan (G&A, 2025b).

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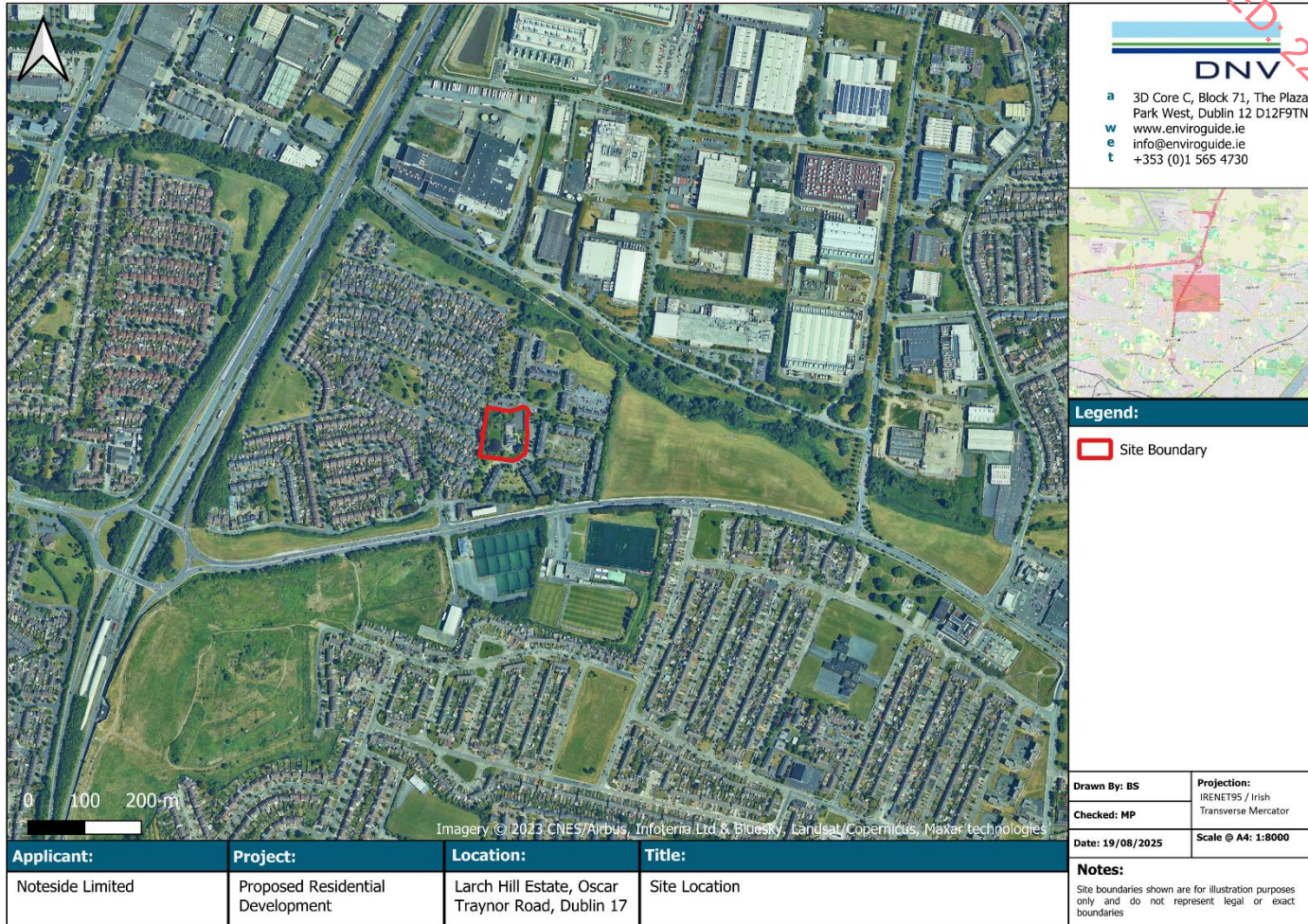


FIGURE 1. SITE LOCATION.

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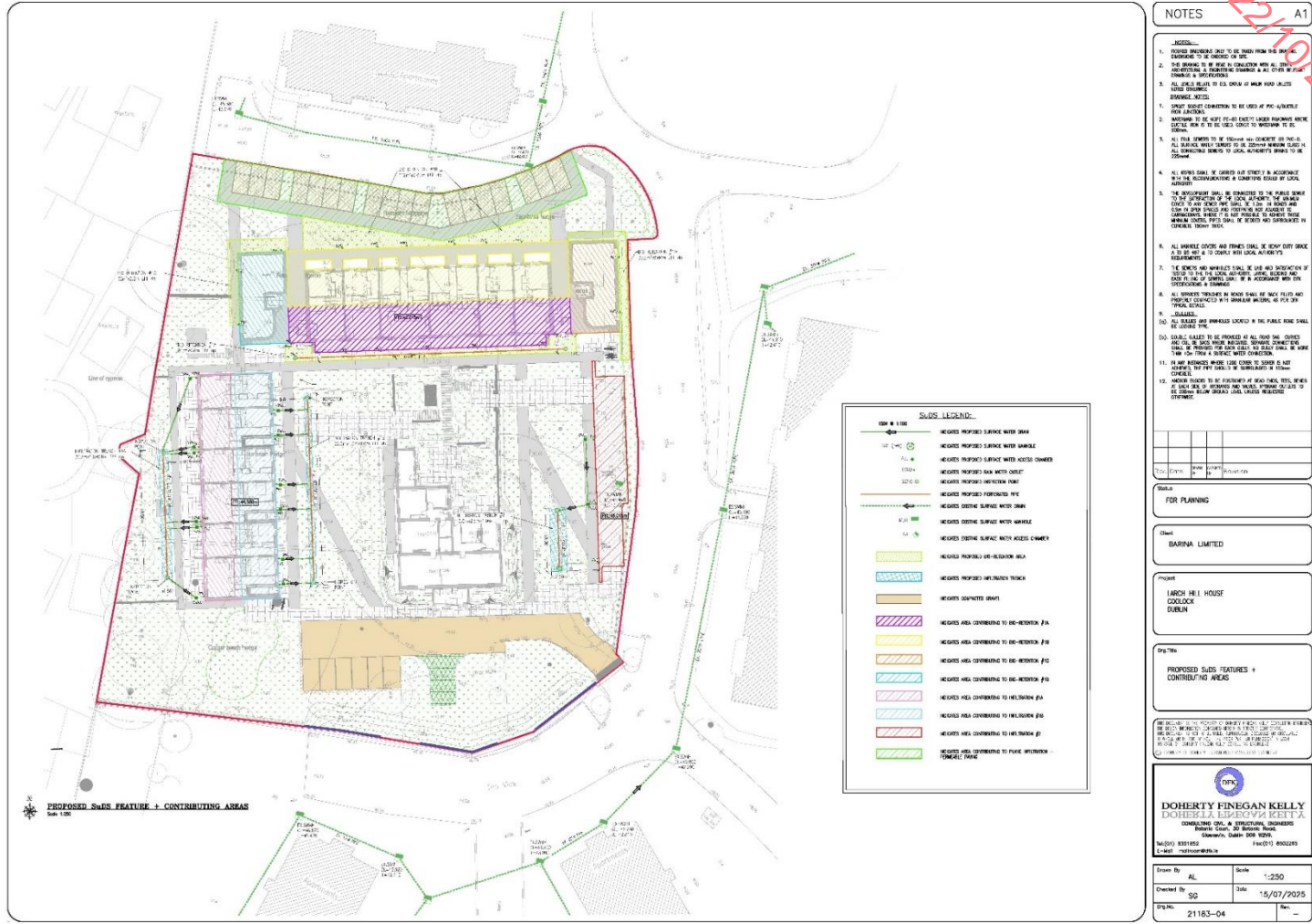


FIGURE 4. PROPOSED SUDS AND CONTRIBUTING AREAS (DFK, 2025d)

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protected Areas (SPAs). The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011). It is the responsibility of each member state to designate SPAs and SACs, both of which will form part of Natura 2000, a network of protected sites throughout the European Community.

SACs and SPAs are collectively known as “Natura 2000” or “European” sites. SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the sites; from these the conservation objectives of the site are derived.

An ‘Appropriate Assessment’ (AA) is an assessment required prior to the grant of planning permission to determine whether a plan or project, based on best scientific knowledge, will have an adverse effect on the integrity of a European site, either alone or in combination with other plans and projects. It is required for any plan or project not directly connected with or necessary to the management of a site but likely to have a significant effect on it.

An AA is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a Natura 2000 site. Paragraph 3 states that:

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

2.1.1 Legislative Context

The obligations in relation to a Natura Impact Statement (NIS) have been implemented in Ireland under Chapter 3 of Part 6 of the Planning and Development Act 2024, and in particular Section 215 in relation to Natura Impact Statements.

A NIS may be prepared and submitted to the competent authority by the applicant for permission.

The preparation of a NIS must comply with the following content requirements as per the Planning and Development Act 2024:

- The NIS must be prepared by a person with the necessary scientific competence.
- It must specify all habitat types and species for which the relevant European site(s) is (/ are) designated and those likely to be significantly affected by the development.
- The NIS must identify all potential significant effects of the development on the relevant European site(s), considering its (/ their) conservation objectives. This includes effects arising from the development itself or in combination with other plans or projects.
- It must assess the identified effects and their implications for the European site(s).
- The NIS should identify any measures proposed to avoid or reduce adverse effects on the European site(s).
- Based on the assessments, the NIS must conclude whether the proposed development will adversely affect the integrity of the European site(s). Additionally, this may extend to:
 - Retrospective consent applications, the NIS must conclude whether the development has, is, or will adversely affect the integrity of the European site.
 - Requests to alter or extend permissions, the NIS must conclude whether the proposed changes will adversely affect the integrity of the European site.

Following the preparation and submission of a NIS by the applicant for permission, the competent authority shall carry out an appropriate assessment of the relevant development as per the obligations set out in the Planning and Development Act 2024, Part 6, Chapter 3, Section 217.

2.2 Policy Context

2.2.1 Dublin City Development Plan 2022-2028

While the City Development Plan in its entirety is relevant to the Proposed Development and can be referred to separately, policies, principles and objectives of the Dublin City Development Plan 2022-2028 that are of relevance to this Screening Report are outlined below:

- **Policy GI9:** To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).
- **Policy GI10:** To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as supporting the favourable conservation condition of any European sites.

- **Policy GI12:** To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.
- **Policy GI13:** To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.

2.2.2 Dublin City Biodiversity Action Plan 2021-2025

Dublin City Biodiversity Action Plan is set out to protect and improve biodiversity through specific objectives:

- **Objective 1:** Ensure effective implementation of the Dublin City Biodiversity Action Plan.
- **Objective 2:** Protect designated sites for nature conservation in accordance with the Conservation Management objectives for Natura 2000 sites and proposed Natural Heritage Areas in Dublin City.
- **Objective 3:** Identify and protect sites that have conservation value for biodiversity using evidence-based research.
- **Objective 4:** Monitor and conserve legally protected species within Dublin City, particularly those listed in the annexes of the EU Birds and Habitats Directive using evidence-based research.
- **Objective 5:** Prepare and plan for the impacts of climate change on biodiversity.
- **Objective 6:** Implement measures for species with that have a local biodiversity value or impact local biodiversity.
- **Objective 7:** Prepare and disseminate information on guidance for development and site management for biodiversity conservation.
- **Objective 8:** Devise and implement habitat restoration initiatives across Dublin City.
- **Objective 9:** To use nature-based solutions to restore biodiversity and ecosystem services.
- **Objective 10:** Strengthen measures to control Invasive Alien Species (IAS), improve biosecurity and ecological status of catchments.
- **Objective 11:** Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works.
- **Objective 12:** Promote net biodiversity gain and ensure there is no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure.
- **Objective 13:** Pilot initiatives for the creation of habitats using artificial habitat methods.
- **Objective 14:** Minimise and reduce soil degradation in the Dublin City Council administrative area.
- **Objective 15:** Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works.
- **Objective 16:** Empower citizens to connect with and take positive action for biodiversity at a local and city-wide level.
- **Objective 17:** Strengthen collaboration for the conservation of biodiversity at a regional, national, and global level.

2.3 Stages of Appropriate Assessment

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

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

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

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

2.4 Stage 1: Appropriate Assessment Screening Conclusion

An AA Screening Report was prepared for the Proposed Development by DNV in August 2025. The conclusion of the AA Screening Report is as follows:

“The Proposed Development located within the Larch Hill Estate, Coolock, Dublin 17 has been assessed taking into account:

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

*In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **cannot be excluded** that the Proposed Development will have a significant effect on either of the two European sites listed below:*

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006)

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

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded in light of the above listed European sites’ conservation objectives. Thus, there is a requirement to proceed to Stage 2 of the Appropriate Assessment process; and a NIS has been prepared and accompanies this submission under separate cover.”

As such, this NIS will assess the potential effects of the Proposed Development on

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006)

These sites are linked to the Proposed Development via hydrological pathways.

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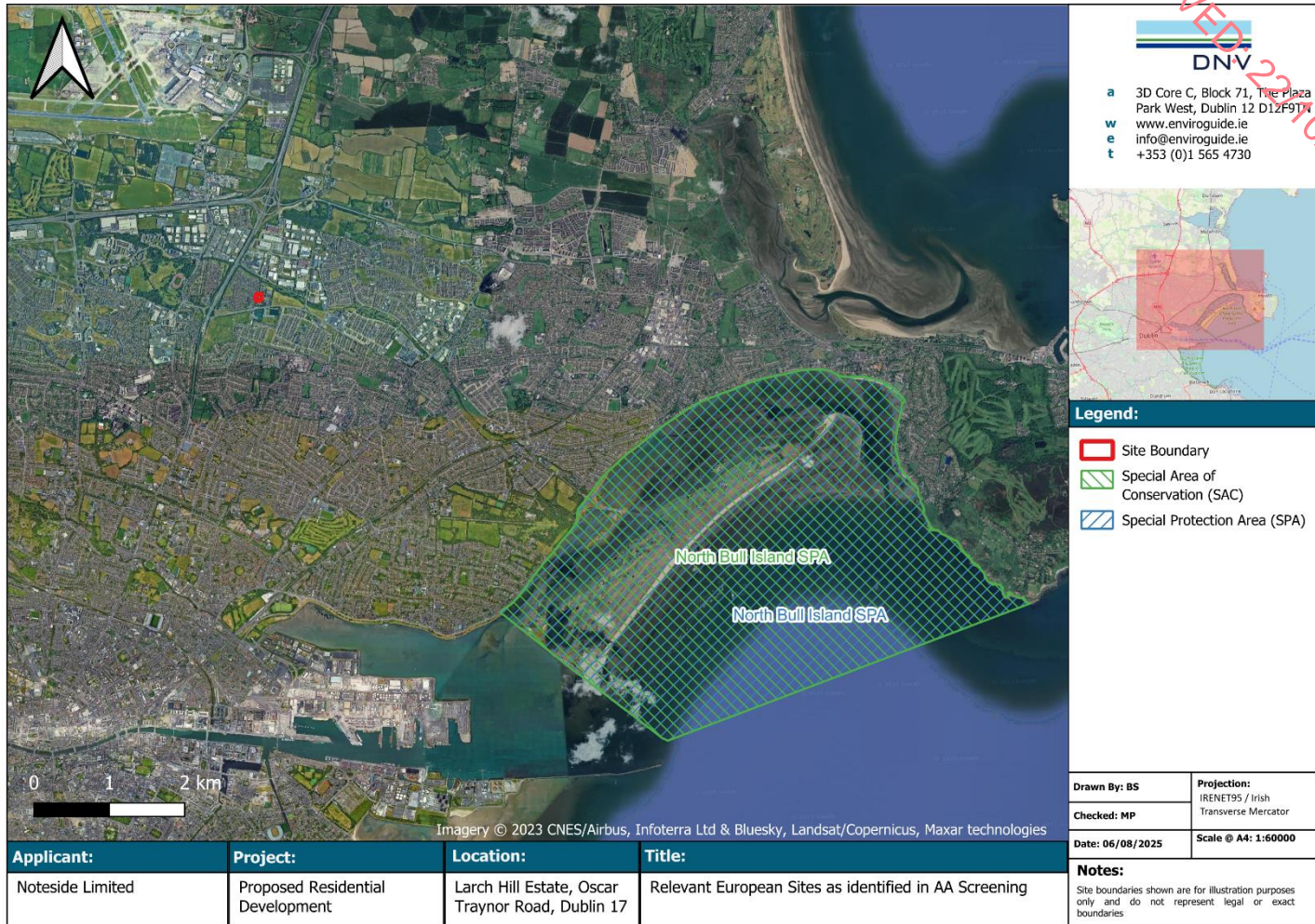


FIGURE 6. RELEVANT EUROPEAN SITES AS IDENTIFIED IN AA SCREENING WITH A RELEVANT S-P-R LINKAGE TO THE SITE (DNV, 2025)

3 NIS METHODOLOGY

3.1 Guidance

This NIS has been undertaken in accordance with the following guidance:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 revision);
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10;
- Communication from the Commission on the precautionary principle (European Commission, 2000);
- Managing Natura 2000 sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (European Commission, 2019);
- Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission, 2021);
- Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021; and
- Amendments to section 42 of the Planning and Development Act 2000, as amended and associated Planning and Development Regulations 2001. Department of the Environment, Heritage and Local Government. (2021). Circular Letter: EUIPR 01/2021.

3.2 NIS Steps

This NIS has been prepared following the steps described below:

- Description of the baseline existing environment at the Site of the Proposed Development;
- Review and description of available data for the relevant European site(s) potentially affected as identified in the Screening Report (DNV, 2025);
- Identification and description of potential effects on the relevant European site(s) and their designated QIs/SCIs;
- Assessment of the likely significance of the effects and/or impacts identified on the relevant QIs/SCIs in view of their Site Specific Conservation Objectives (SSCOs) where available;
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the relevant QIs/SCIS;
- Identification of appropriate mitigation measures to remove the likelihood of significant effects on any European site(s) and their QIs/SCI; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects once mitigation measures are adhered to.

3.3 Desk Study

A desktop study was carried out to collate and review available information, datasets and documentation sources relevant for the completion of the NIS. The desktop study, completed in August 2025, relied on the following sources:

- Information on the network of European sites, relevant boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie and the European Environment Agency (EEA) at <https://natura2000.eea.europa.eu/>;
- Information on the status of EU protected habitats and species in Ireland, obtained from the NPWS Article 17 reports;
- Text summaries of the relevant European sites taken from the respective Site Synopses for each site, available at www.npws.ie;
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.gis.epa.ie;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at www.gsi.ie;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the extent, nature and location of the Proposed Development, provided by the applicant and their design team.

A comprehensive list of all the specific documents and information sources consulted in the completion of this report is provided in Section 6 - References.

3.4 Field Surveys

A range of ecological field surveys have been carried out at the Site to date. These are summarised in Table 1. For full details on the methods and results of the fields surveys listed, please refer to the EclA accompanying this application under separate cover. All surveys were carried out at the appropriate time of year by suitably qualified ecologists. No limitations to field surveys were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development. Results relevant to this Screening Report have been summarised in section Table 1.

TABLE 1. FIELD SURVEYS UNDERTAKEN AT THE PROPOSED DEVELOPMENT SITE.

Survey	Surveyor(s)	Dates
Preliminary Ecological Appraisal	BMC, SH	11 th May 2023
Bat Activity Survey	BMC, SH	30 th August 2022
Updated Preliminary Ecological Appraisal	EK, SH	30 th May 2025
Bat Activity Transect Surveys (X2)	BMC, CM	30 th July 20 th August

3.5 Impact Prediction

Potential impacts on the relevant European site(s) identified during the AA Screening are based on information regarding their QIs and/or SCI species, and the attributes and targets relating to their SSCOs where available. These have been informed by the desk study and any field surveys carried out prior to the preparation of this report. Impact prediction is based on the Source-Pathway-Receptor (S-P-R) model. The following describes the steps of the S-P-R approach taken in this NIS:

- Potential sources of effects were identified based on the Proposed Development description and details, including changes to potentially suitable *ex-situ* habitats at the Site (i.e., habitats utilised by Species of Conservational Importance (SCI) bird species outside of their designated SPAs).
- Up-to-date GIS spatial datasets for water catchments as well as any information from relevant Site investigations and/or field surveys were used to identify the QIs/ SCIs within the relevant European site(s) that have a notable S-P-R connection to the Proposed Development:
 - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any QIs/SCIs.
 - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any QIs/SCIs.
 - Air and land connectivity assessed based on Proposed Development details and proximity to QIs/SCIs.
 - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Identification of potential impacts for those QIs/SCIs linked to the Proposed Development via notable S-P-R connections.

Where the preceding steps identified any potential for adverse impacts on any QIs/SCIs for the relevant European site(s), appropriate mitigation measures to eliminate the potential for significant adverse effects are identified in this report.

3.6 Limitations

No limitations were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development on the relevant European sites.

4 NATURA IMPACT STATEMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology, Geology and Hydrogeology

The Site is located on the Liffey and Dublin Bay catchment and the Mayne_SC_010 sub catchment. The Santry River (IE_EA_09S010300) is situated approximately 0.16km northeast of the Site and runs in a southeasterly direction for approximately 5.5km before discharging into the Tolka Estuary (IE_EA_090_0100). The Bachelors Stream (IE_EA_09S010300) is approximately 4.4km southwest of the Site and runs in a south-westerly direction before joining the Tolka River (IE_EA_09T011150) which runs approximately 3.7km southwest of the Site, also in a southeasterly direction and discharges into the Tolka Estuary after approximately 0.5km. The Bachelors Stream is recognised by the EPA as the River Tolka, therefore will be treated as such throughout the rest of this report.

The WFD status of the Santry River is 'Poor', and its risk projection is 'At Risk'. The WFD status of the Tolka River is 'Moderate' and its risk projection is 'At Risk'. The EPA water quality monitoring data for the stations closest to the Site for which data was available are summarised in Table 2 below. Note that there is no up-to-date information for relevant monitoring stations in the Santry or Tolka.

TABLE 2. EPA MONITORING STATIONS AND ASSIGNED Q VALUES

EPA Monitoring Station name	Station Code	Location from Site	Distance from Site	Assigned Q value
Clonshaugh Rd Br	RS09S010300	Southeast, downstream via the Santry River	0.95km	2-3 'Poor'
Violet Hill Drive Finglas	RS09T011100	Southwest, upstream of Tolka river from Site	5.2km	3 'Poor'
Bettyglen	RS09S011100	Southeast, downstream via the Santry River	4.5km	3 'Poor'

The Site of the Proposed Development is situated on the Dublin (IE_EA_G_008) groundwater body. The WFD status of the Dublin GWB is 'Good'. Its WFD risk projection is currently 'under review'. The bedrock aquifer in the area is a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones'. The groundwater rock units underlying the aquifer are classified as 'Dinantian Upper Impure Limestones'. The level of vulnerability to groundwater contamination from human activities is 'Low'. The subsoil found at the Site is of 'Limestone Till (Carboniferous)', and the soil is classed as 'Urban' (EPA, 2025).

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The Waterbody Status for river, coastal and groundwater water bodies relevant to the Site as recorded by the EPA (2023) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003) are provided in Table 3 below.

TABLE 3. WFD RISK AND WATER BODY STATUS

Waterbody Name	Water body; EU code	Location from Site	Distance from Site (km)	WFD water body status (2016-2021)	WFD 3 rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
Santry River	IE_EA_09S010300	North	0.16km	Poor	At risk	Surface water runoff from Site
TOLKA_060	IE_EA_09T011150	Southwest	3.7km	Poor	At risk	Surface water runoff from Site
Coastal Water Bodies						
North Bull Island	IE_EA_090_0100	East	5.7km	Moderate	Review	Downstream of the Santry River
Tolka Estuary	IE_EA_090_0200	Southeast	4.2km	Poor	At risk	Downstream of the Tolka River
Groundwater Bodies						
Dublin Groundwater Body	IE_EA_G_008	Underlying	Underlying	Good	Review	Underlying groundwater-body

4.1.1.2 *Ex-situ* SCI feeding Sites within the vicinity of the Proposed Development

Wintering waterfowl such as Light-bellied Brent Geese (LBBG) (*Branta bernicla hrota*) are known to utilise inner-city grassland *ex-situ* feeding grounds during the winter months (i.e., areas outside of an SPA that may provide important foraging or roosting habitat for SCI (Special Conservation Interest) species).

To determine whether any known *ex-situ* foraging habitat for SCI species is located within the vicinity of the Proposed Development, reference was made to Enviroguide Consulting (2022) and Benson (2009). These documents provide information on the network of *ex-situ* inland feeding sites utilised by winter birds in Dublin. According to the aforementioned documents, there are three known *ex-situ* feeding sites for LBBG in close proximity to the Proposed Development.

TABLE 4. KNOWN *EX-SITU* SITES FOR LIGHT BELLIED BRENT GESE IN CLOSE PROXIMITY TO THE SITE OF THE PROPOSED DEVELOPMENT. THE LEVEL OF IMPORTANCE OF THE SITE IS GIVEN IN BRACKETS (ENVIROGUIDE, 2022)

<i>Ex-situ</i> Site Name	Distance to Proposed Development
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Kilmore/Oscar Traynor Football Pitches (High)	140m east
Coolock Park East (Low)	630m east
Castletimon Green (Low)	390m south

4.1.2 Relevant Field Survey results

Whilst DNV have conducted surveys at the Site for a previous application in 2023, an updated walkover survey was conducted on 30th May 2025 given the time which had elapsed since the initial surveys. This walkover included a vegetation survey, habitat mapping, breeding bird scoping survey, mammal scoping survey, and potential bat roost assessment (PBRA) including internal inspections of both building attics. The results of each component of the survey are described in brief below and, where appropriate, compared to previous 2023 survey results. For full survey results, please consult the EclA for the Proposed Development which has been submitted under a separate cover.

4.1.2.1 Habitats & Flora

No protected flora, or QI habitats associated with European sites in the vicinity were observed on-site during either the 2023 or 2025 visit.

4.1.2.2 Fauna

Few birds were noted on Site on the 30th of May 2025. These were Wood Pigeon (*Columba palumbus*), Feral Pigeon (*Columba livia f. domestica*), Robin (*Erithacus rubecula*), and Blackbird (*Turdus merula*). Similarly in 2023, only 5 amber species birds and no red listed species were noted during the bird scoping survey in 2023.

In summary, while this does not preclude their presence, no QI or SCI species from any of the surrounding or hydrologically connected SACs or SPAs were identified as being present on-site, nor was any suitable habitat for these species present at the Site.

4.2 Summary Of Relevant European Sites

The following descriptions of the relevant habitats and species occurring within the European site(s) considered in this NIS have been extracted from the Standard Data Forms (EEA 2023), Site Synopses (NPWS 2019a) and any supporting documents available for the relevant site(s).

4.2.1 North Dublin Bay SAC (000206)

The following description of the North Dublin Bay SAC is extracted from the site Synopsis (NPWS 2013a) for the site:

“Site possesses an excellent diversity of coastal habitats. The North Bull Island dune system is one of the most important systems on the east coast and is one of the few in Ireland that is actively accreting. It possesses extensive and mostly good quality examples of embryonic, shifting marram and fixed dunes, as well as excellent examples of humid dune slacks. Both Atlantic and Mediterranean salt marshes are well represented and a particularly good marsh zonation is shown. The salt marshes grade into mudflats and sandflats, some of which are dominated by annual Salicornia species. Petalophyllum ralfsii occurs at its only known station away from the western seaboard.

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The site has five Red Data Book vascular plant species and four Red Data Book bryophyte species. This is one of the most important sites for wintering waterfowl in Ireland, with internationally important populations of Light-bellied Brent Goose Branta bernicla hrota, Knot, Calidris canutus and Bar-tailed Godwit, Limosa lapponica, plus nationally important numbers of a further 14 species. 20% of the national total of Grey Plover Pluvialis squatarola occurs here. Formerly it had important colony of Little Tern, Sterna albifrons. North Dublin Bay is nationally important for three insect species. The scientific interests of the site have been well documented and future prospects are good owing to the various designations assigned to site.”

4.2.2 North Bull Island SPA (004006)

The following description of the North Bull Island SPA is extracted from the site Synopsis (NPWS 2014) for the site: *“The site is among the top ten sites for wintering waterfowl in the country. It supports internationally important populations of Light-bellied Brent Goose, Branta bernicla hrota and Bar-tailed Godwit Limosa lapponica. A further 14 species have populations of national importance, with particular notable numbers of Shelduck, Tadorna tadorna (8.5% of national total), Pintail, Anas acuta (11.6% of national total), Grey Plover, Pluvialis squatarola (6.9% of national total), Knot, Calidris canutus (10.5% of national total). North Bull Island SPA is a regular site for passage waders such as Ruff, Philomachus pugnax, Curlew Sandpiper, Calidris ferruginea and Spotted Redshank, Tringa erythropus. The site supports Asio flammeus in winter. Formerly the site had an important colony of Little Tern, Sterna albifrons but breeding has not occurred in recent years. The site provides both feeding and roosting areas for the waterfowl species. Habitat quality for most of the estuarine habitats is very good. The site has a population of the rare Petalophyllum ralfsii which is the only known station away from the western seaboard as well as five Red Data Book vascular plant species and four bryophyte species. It is nationally important for three insect species. Wintering bird populations have been monitored more or less continuously since the late 1960s, and the other scientific interests of the site have also been well documented. Future prospects are good owing to various designations assigned to site.”*

4.2.3 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the relevant European site(s) are detailed in Table 5 below.

TABLE 5. QUALIFYING INTERESTS (QIs) / SPECIAL CONSERVATION INTERESTS (SCIs) AND THEIR CONSERVATION OBJECTIVES FOR THE RELEVANT EUROPEAN SITES. THE CONSERVATION STATUS OF EACH QI / SCI WAS SOURCED FROM THE RELEVANT STANDARD DATA FORM(S) (SOURCE: EEA (2023)) AND THE LATEST NATIONAL STATUS IS TAKEN FROM THE LATEST ARTICLE 17 REPORT (NPWS, 2019A & 2019B) AND BOCCI¹ RESPECTIVELY.

QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
North Dublin Bay SAC (000206)		

¹ Birds of Conservation Concern in Ireland (BOCCI) 2020-2026 (Gilbert, Stanbury & Lewis, 2021). The colours represent the species designation on the various BOCCI lists.



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QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
Mudflats and sandflats not covered by seawater at low tide [1140]	B	To <u>maintain</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
Annual vegetation of drift lines [1210]	B	To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
<i>Salicornia</i> and other annuals colonising mud and sand [1310]	A	
Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]	B	To <u>maintain</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]	B	
Embryonic shifting dunes [2110]	A	To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]	B	
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	A	
Humid dune slacks [2190]	A	
Petalwort (<i>Petalophyllum ralfsii</i>) [1395]	B	To <u>maintain</u> the favourable conservation condition of Petalwort in North Dublin Bay SAC.
North Bull Island SPA (004006)		
Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]	A	To <u>maintain</u> the favourable conservation condition of this SCI species within North Bull Island SPA
Shelduck (<i>Tadorna tadorna</i>) [A048]	A	
Teal (<i>Anas crecca</i>) [A052]	A	



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QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
Pintail (<i>Anas acuta</i>) [A054]	A	
Shoveler (<i>Anas clypeata</i>) [A056]	A	
Oystercatcher (<i>Haematopus ostralegus</i>) [A130]	A	
Golden Plover (<i>Pluvialis apricaria</i>) [A140]	C	
Grey Plover (<i>Pluvialis squatarola</i>) [A141]	A	
Knot (<i>Calidris canutus</i>) [A143]	A	
Sanderling (<i>Calidris alba</i>) [A144]	A	
Dunlin (<i>Calidris alpina</i>) [A149]	A	
Black-tailed Godwit (<i>Limosa limosa</i>) [A156]	A	
Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]	A	
Curlew (<i>Numenius arquata</i>) [A160]	A	
Redshank (<i>Tringa totanus</i>) [A162]	A	
Turnstone (<i>Arenaria interpres</i>) [A169]	A	
Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]	A	
Wetland and waterbirds [A999]	N/A	To <u>maintain</u> the favourable conservation condition of the wetland habitat in South Dublin Bay and River Tolka Estuary SPA as a resource for the

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QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
		regularly occurring migratory waterbirds that utilise it.

4.3 Impact Prediction

This section follows the S-P-R method as outlined in Section 2.3 to identify if and how any of the QIs/SCIs of the relevant European site are linked to the Proposed Development. Once the connections have been identified the potential impacts of the Proposed Development on North Dublin Bay SAC and North Bull Island SPA in light of their QIs/SCIs are assessed.

For the purposes of objectivity and clarity, mitigation measures **are not considered in the impact prediction**. This includes all measures that will act limit or eliminate the potential for significant adverse impacts on the relevant European site.

4.3.1 Potential impacts of the Proposed Development on key Species and Habitats

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

Construction Phase (*Estimated duration: 5 years, commencing Q3 2026*)

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

Operational Phase (*Estimated duration: Indefinite*)

- Surface water drainage from the Site of the Proposed Development;
- Foul water from the Proposed Development;

- Increased lighting at the Site and in the vicinity emitted from the Proposed Development; and Increased human presence and activity at the Site and in the vicinity as a result of the Proposed Development.
- Loss or disturbance to suitable neighbouring *ex-situ* habitat for SCI bird species associated with nearby European Sites.

The QIs/SCIs for the relevant European sites as shown on Figure 6 are described in Table 6 below which outlines the identified pathways between the Proposed Development and the relevant QIs/SCIs, and assesses the potential significant effects of the Proposed Development on these. The assessment outlined below does not consider mitigation measures that will be implemented as part of the Proposed Development, but the nature of mitigation that will be required to eliminate the potential for significant adverse impacts is identified in the table, if any.

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TABLE 6. ASSESSMENT OF THE POTENTIAL IMPACT OF THE PROPOSED DEVELOPMENT ON THE QIs AND SCIs OF THE RELEVANT EUROPEAN SITES. THOSE QIs/SCIs FOR WHICH NOTABLE IMPACT PATHWAYS WERE IDENTIFIED HAVE BEEN HIGHLIGHTED IN GREEN.

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
North Dublin Bay SAC (000206)			
[1140] Mudflats and sandflats not covered by seawater at low tide			
<u>Conservation objective:</u> To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.			
<p>This habitat is approx. 578ha in size and comprises the intertidal section of the coastline, where sands and muds dominate. The overall status of this habitat in Ireland is inadequate and deteriorating.</p>	<p>This habitat covers most of the SAC and extends from the north of the Bull wall on the west of the island and out to the east up as far as Howth.</p> <p>There will be no direct loss of this habitat as a result of the Proposed Development. There is a hydrological pathway between this habitat and any construction-related surface water discharges from the Proposed Development via surface water discharges to the Santry.</p> <p>The potential for adverse effects on this QI is</p>	<p>This QI habitat is both freshwater and marine influenced and lies downstream of the Proposed Development, via the Santry River.</p> <p><u>Construction Phase:</u></p> <p>During Construction, in the event that pollutants such as hydrocarbons, silt or sediment are released from the Site into the Santry River, adverse effects could arise as a result of a water quality deterioration. Such effects arising from a pollution event may include habitat alteration or fragmentation, resulting from degradation of the communities that comprise this QI habitat. Mitigation is therefore required to protect this QI during the Construction Phase of the Proposed Development.</p> <p><u>Operational Phase:</u></p> <p>It is considered that there is no potential for adverse effects on this QI during the Operational Phase, given the embedded mitigation as a component of the design of this proposal in the form SuDS use which ensure all surface waters are diverted to bioretention and infiltration trenches or permeable paving and pass through fitted infiltration systems. While the primary reason for the instalment of these features is to protect surface water, these measures will also protect downstream SACs, and consequently this QI</p>	<p><u>Construction Phase</u></p> <p>See mitigation measures in Sections 4.4 and 4.5</p> <p><u>Operational Phase:</u></p> <p>No Operational Phase mitigation outside of the embedded mitigation included as a component of the design of the Proposed Development is deemed necessary.</p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>therefore assessed further in this report.</p>	<p>habitat. Mitigation is therefore not required to protect this QI during the Operational Phase of the Proposed Development.</p>	
<p>[1210] Annual vegetation of drift lines</p> <p><u>Conservation Objective:</u> To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.</p>			
<p>Drift lines occur on sandy or shingle substrate at the upper part of the strand, around the high tide mark. Water-borne material including organic matter is deposited on the shore and provides nutrients and a seed source for vegetation. This habitat is very difficult to measure in view of its dynamic nature, which means that it can appear and disappear within a site from year to year. This habitat was recorded from both North Bull and South Bull sub-sites by the Coastal Monitoring Project (CMP) (Ryle et al., 2009) but was only recorded in South Bull by the SDM. This habitat is located approx. 6.5 km east of the Site of the Proposed Development on the east side of North Bull Island.</p>	<p>This habitat covers some 0.11 ha within the SAC however it is very difficult to measure in view of its dynamic nature, which means that it can appear and disappear within a site from year to year. This habitat was recorded from both North Bull and South Bull sub-sites by the Coastal Monitoring Project (CMP) (Ryle et al., 2009) but was only recorded in South Bull by the SDM. This habitat is located approx. 6.5 km east of the Site of the Proposed Development on the east side of North Bull Island.</p>	<p>None anticipated as no notable impact pathways were identified</p>	<p>None required</p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
<p>Project (CMP) (Ryle et al., 2009) but was only recorded in South Bull by the SDM.</p>	<p>There will be no direct loss of this habitat due to the Proposed Development. There is a significant marine water buffer between the location of any potential construction related surface water discharges at the Site of the Proposed Development and the recorded locations of this habitat within North Dublin Bay SAC.</p> <p>The potential for adverse effects on this habitat is therefore excluded.</p>		
<p>[1310] <i>Salicornia</i> and other annuals colonizing mud and sand <u>Conservation Objective:</u> To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.</p>			
<p>This habitat is a pioneer saltmarsh community that may occur on muddy sediment seaward of established saltmarsh, or form patches within other saltmarsh communities</p>	<p>The closest recorded location of <i>Salicornia</i> mud [1310] is on the western side of North Bull within North Dublin Bay, approx. 5.5 km to the southeast of the Site of the</p>	<p>This QI habitat is both freshwater and marine influenced and lies downstream of the Proposed Development, via the Santry River.</p> <p><u>Construction Phase:</u></p> <p>During Construction, in the event that pollutants such as hydrocarbons, silt or sediment are released from the Site into the Santry River, adverse effects could arise as a result of a water quality deterioration. Such effects arising</p>	<p><u>Construction Phase</u></p> <p>See Mitigation Measures in Sections 4.4 and 4.5</p> <p><u>Operational Phase:</u></p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
<p>where the elevation is suitable and there is regular tidal inundation. Overall, this habitat is Favourable in Ireland, with a stable trend.</p>	<p>Proposed Development. Salicornia is an annual species, so its distribution can vary significantly from year to year. The largest area of Salicornia flats occurs north of the central causeway.</p> <p>There will be no direct loss of this habitat as a result of the Proposed Development. This habitat is however located near to the outflow of Santry river.</p> <p>The potential for adverse effects on this QI is therefore assessed further in this report.</p>	<p>from a pollution event may include habitat alteration or fragmentation, resulting from degradation of the communities that comprise this QI habitat. Mitigation is therefore required to protect this QI during the Construction Phase of the Proposed Development.</p> <p>Operational Phase:</p> <p>It is considered that there is no potential for adverse effects on this QI during the Operational Phase, given the embedded mitigation as a component of the design of this proposal in the form SuDS use which ensure all surface waters are diverted to bioretention and infiltration trenches or permeable paving and pass through fitted infiltration systems. While the primary reason for the instalment of these features is to protect surface water, these measures will also protect downstream SACs, and consequently this QI habitat. Mitigation is therefore not required to protect this QI during the Operational Phase of the Proposed Development.</p>	<p>No operational phase mitigation outside of the embedded mitigation included as a component of the design of the Proposed Development is deemed necessary.</p>
<p>[1330] Atlantic Salt Meadows (<i>Glauco-Puccinellietalia maritima</i>)</p> <p><u>Conservation Objective:</u> To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.</p>			
<p>Atlantic salt meadows contain several distinctive zones that are related to elevation and submergence frequency</p>	<p>The closest recorded location of Atlantic salt meadows [1330] within the SAC is located on the western side of the Bull Island, approx. 5.5</p>	<p>This QI habitat is both freshwater and marine influenced and lies downstream of the Proposed Development, via the Santry River.</p> <p>Construction Phase:</p> <p>During Construction, in the event that pollutants such as hydrocarbons, silt or sediment are released from the Site into the Santry River, adverse effects</p>	<p>Construction Phase</p> <p>See Mitigation Measures in Sections 4.4 and 4.5</p> <p>Operational Phase:</p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
<p>and they are distributed around most of the coastline of Ireland.</p> <p>The overall quality in Ireland is Inadequate, due mainly to pressures from agriculture, including ecologically unsuitable grazing regimes and land reclamation, and the invasive non-native species common cord-grass (<i>Spartina anglica</i>).</p>	<p>km to the east of the Site of the Proposed Development. Based on data from the Saltmarsh Monitoring Project (SMP) (McCorry, 2007), Atlantic salt meadow (ASM) was surveyed and mapped at a single site, giving an estimated area of 81.84ha. Other parcels of this habitat are located at Portmarnock Point and at the north of the Bay near the outflow of the Sluice River. The ASM at Bull Island was the largest single section of saltmarsh surveyed by the SMP in 2006.</p> <p>There will be no direct loss of this habitat as a result of the Proposed Development. This habitat is however located near to the outflow of Santry river.</p> <p>The potential for adverse effects on this QI is</p>	<p>could arise as a result of a water quality deterioration. Such effects arising from a pollution event may include habitat alteration or fragmentation, resulting from degradation of the communities that comprise this QI habitat. Mitigation is therefore required to protect this QI during the Construction Phase of the Proposed Development.</p> <p>Operational Phase:</p> <p>It is considered that there is no potential for adverse effects on this QI during the Operational Phase, given the embedded mitigation as a component of the design of this proposal in the form SuDS use which ensure all surface waters are diverted to bioretention and infiltration trenches or permeable paving and pass through fitted infiltration systems. While the primary reason for the instalment of these features is to protect surface water, these measures will also protect downstream SACs, and consequently this QI habitat. Mitigation is therefore not required to protect this QI during the Operational Phase of the Proposed Development.</p>	<p>No operational phase mitigation outside of the embedded mitigation included as a component of the design of the Proposed Development is deemed necessary.</p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>therefore assessed further in this report.</p>		
<p>[1410] Mediterranean salt meadows (<i>Juncetalia maritima</i>)</p> <p><u>Conservation Objective:</u> To maintain the favourable conservation condition of these habitats in North Dublin Bay SAC.</p>			
<p>Mediterranean salt meadows are widespread on the Irish coastline, although not as extensive as Atlantic saltmarsh. The overall status of this habitat is Inadequate, mainly due to pressures associated with agriculture, including overgrazing, undergrazing and land reclamation.</p>	<p>This habitat is located on North Bull Island and is an estimated area of 7.98 ha, including mosaics. The habitat is approx. 6.3 km southeast of the Site of the Proposed Development.</p> <p>There will be no direct loss of this habitat because of the Proposed Development. However, this habitat is located on the western side of North Bull Island, north of the central causeway and therefore within the outflow area of the Santry.</p> <p>The potential for adverse effects on this QI is</p>	<p>This QI habitat is both freshwater and marine influenced and lies downstream of the Proposed Development, via the Santry River.</p> <p><u>Construction Phase:</u></p> <p>During Construction, in the event that pollutants such as hydrocarbons, silt or sediment are released from the Site into the Santry River, adverse effects could arise as a result of a water quality deterioration. Such effects arising from a pollution event may include habitat alteration or fragmentation, resulting from degradation of the communities that comprise this QI habitat. Mitigation is therefore required to protect this QI during the Construction Phase of the Proposed Development.</p> <p><u>Operational Phase:</u></p> <p>It is considered that there is no potential for adverse effects on this QI during the Operational Phase, given the embedded mitigation as a component of the design of this proposal in the form SuDS use which ensure all surface waters are diverted to bioretention and infiltration trenches or permeable paving and pass through fitted infiltration systems. While the primary reason</p>	<p><u>Construction Phase</u></p> <p>See Mitigation Measures in Sections 4.4 and 4.5</p> <p><u>Operational Phase:</u></p> <p>No operational phase mitigation outside of the embedded mitigation included as a component of the design of the Proposed Development is deemed necessary.</p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>therefore assessed further in this report.</p>	<p>for the instalment of these features is to protect surface water, these measures will also protect downstream SACs, and consequently this QI habitat. Mitigation is therefore not required to protect this QI during the Operational Phase of the Proposed Development.</p>	
<p>[2110] Embryonic shifting dunes</p> <p><u>Conservation Objectives:</u> To restore the favourable conservation condition of these habitats in North Dublin Bay SAC.</p>			
<p>Embryonic shifting dunes are unstable habitats where wind-blown sand is common. This habitat is vulnerable to saltwater intrusion. They represent the initial phase of dune formation and typically form where sand gathers around salt-tolerant species. The status of this habitat within Ireland is assessed as being inadequate, due to pressures related to recreation and coastal defense.</p>	<p>Located along on the eastern margin of North Bull Island, this terrestrial habitat is approx. 6.5 km from the Site of the Proposed Development.</p> <p>There will be no direct loss of habitat as a result of the Proposed Development.</p> <p>There is a significant marine water buffer between the location of any construction related surface water discharges at the Site of the Proposed Development and the nearest recorded locations of the habitat.</p>	<p>None anticipated as no notable impact pathways were identified</p>	

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>The potential for adverse effects on this habitat is therefore excluded.</p>		
<p>[2120] Shifting dunes along the shoreline with <i>Ammophila Arenaria</i> (“white dunes”) Conservation Objectives: To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC</p>			
<p>This habitat comprises dunes that are partially stabilized and dominated by <i>Ammophila Arenaria</i>, although these dunes can erode quickly because of the presence of bare sand. The status of this habitat within Ireland is assessed as being Inadequate, due to pressures related to recreation and coastal defense.</p>	<p>Located west and adjacent to the strips of Embryonic shifting dunes this terrestrial habitat is located approx. 6.5 km from the Site of the Proposed Development. These dunes were surveyed and mapped at two sub-sites, giving a total estimated area of 3.18 ha. Habitat is very difficult to measure in view of its dynamic nature.</p> <p>There will be no direct loss of habitat as a result of the Proposed Development.</p> <p>There is a significant marine water buffer between the location of any construction</p>	<p>None anticipated as no notable impact pathways were identified</p>	

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>related surface water discharges at the Site of the Proposed Development and the nearest recorded locations of the habitat.</p> <p>The potential for adverse effects on this habitat is therefore excluded.</p>		
<p>[2130] Fixed Coastal dunes with herbaceous vegetation (grey dunes)</p> <p>Conservation Objectives: To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC</p>			
<p>This habitat type is relatively sheltered, with much less sand mobility than white dunes and shifting dunes. The sandy substrate is frequently overlain by a layer of humus, and lichens and mosses are often abundant. The overall status of this habitat type in Ireland is classed as Bad, due to threats associated with recreation and</p>	<p>This habitat was surveyed and mapped at two sub-sites to give a total estimated area of 104.85 ha. This habitat covers the majority of eastern side of Bull Island and is situated approx. 6.2 km from the Site of the Proposed Development.</p> <p>There will be no direct loss of habitat as a result of the Proposed Development.</p> <p>There is a significant marine water buffer between the</p>	<p>None anticipated as no notable impact pathways were identified</p>	

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
ecologically unsuitable grazing practices.	<p>location of any construction related surface water discharges at the Site of the Proposed Development and the nearest recorded locations of the habitat.</p> <p>The potential for adverse effects on this habitat is therefore excluded.</p>		
<p>[2190] Humid Dune Slacks</p> <p>Conservation Objectives: To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC</p>			
Humid dune slacks comprise the lowest lying regions within a dune system, with a water table usually within 1m of the surface. The overall status of this habitat in Ireland is assessed as being Inadequate and deteriorating, due to pressures such as fertilizer, human recreation and drainage.	Habitat was surveyed in 2013 for the Sand Dunes Monitoring Project (SDM) (Delaney et al., 2013) and mapped at two sub-sites to give a total estimated area of 12.11ha. The dune slack on North Bull consists of a long stretch of habitat that lies between successive dune ridges over a distance of approx. 700m. The dune slack topography is similar on	None anticipated as no notable impact pathways were identified	

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>South Bull with a number of individual long slacks between dune ridges.</p> <p>The habitat is situated approx. 6 km from the Site of the Proposed Development. There will be no direct loss of habitat as a result of the Proposed Development. There is a significant marine water buffer between the location of any construction related surface water discharges at the Site of the Proposed Development and the nearest recorded locations of the habitat.</p> <p>The potential for adverse effects on this habitat is therefore excluded.</p>		
<p><i>Petalophyllum ralfsii</i> (Petalwort) [1395]</p> <p>Conservation Objectives: To <u>maintain</u> the favourable conservation condition of Petalwort in North Dublin Bay SAC.</p>			
<p>This species is a pioneering thallose</p>	<p>Petalwort is an Annex II liverwort, and Bull Island is</p>	<p>None anticipated as no notable impact pathways were identified</p>	

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
<p>liverwort, found mainly on dune slacks and machair, most commonly on the west coast of Ireland. There are no negative pressures currently impacting upon the habitats in which this species is found, thus the overall status in Ireland is assessed as being Favourable.</p>	<p>the only known location of this species on the Eastern seaboard. The known population of <i>Petalophyllum ralfsii</i> at Bull Island occurs along the track that cuts through the Alder marsh, south and east of St. Anne's Golf Club. Data from NPWS surveys and Campbell (2013).</p> <p>The nearest recorded location of this species is situated approx. 6.5 km from the Site of the Proposed Development. There will be no direct loss of suitable habitat supporting Petalwort as a result of the Proposed Development. There is a significant marine water buffer between the location of any construction related surface water discharges at the Site of the Proposed Development and the</p>		

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
	<p>recorded locations of this species and its habitat within North Dublin Bay SAC.</p> <p>The potential for adverse effects on this habitat is therefore excluded.</p>		
<p><u>North Bull Island SPA (004006)</u></p>			
<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046], Shelduck (<i>Tadorna tadorna</i>) [A048], Teal (<i>Anas crecca</i>) [A052], Pintail (<i>Anas acuta</i>) [A054], Shoveler (<i>Anas clypeata</i>) [A056], Oystercatcher (<i>Haematopus ostralegus</i>) [A130], Golden Plover (<i>Pluvialis apricaria</i>) [A140], Grey Plover (<i>Pluvialis squatarola</i>) [A141], Knot (<i>Calidris canutus</i>) [A143], Sanderling (<i>Calidris alba</i>) [A144], Dunlin (<i>Calidris alpina</i>) [A149], Black-tailed Godwit (<i>Limosa limosa</i>) [A156], Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157], Curlew (<i>Numenius arquata</i>) [A160], Redshank (<i>Tringa totanus</i>) [A162], Turnstone (<i>Arenaria interpres</i>) [A169], Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179], Wetland and Waterbirds [A999]</p>			
<p>Waterbirds refer to a diverse group of birds that are “ecologically dependent on wetlands” (Ramsar Convention, 1971), while the wetlands encompassed within this SPA are considered to be an SCI in their own right. This SPA is an excellent example of an estuarine complex and is one of the</p>	<p>Although considered unlikely to occur, contaminated waters generated by the Proposed Development could lead to reductions in water quality in Dublin Bay, potentially affecting the distribution of prey and foraging habitat of SCI species therein.</p> <p>The potential for adverse effects on these SCI</p>	<p><u>Construction Phase:</u></p> <p>This SPA is designated for the wetlands and associated waterbirds the wetlands support. These SCI species utilise the estuarine habitats for foraging, therefore, should there be alterations to the composition or quality of the estuary / mudflats etc, as a result of water quality deterioration during the Construction Phase, these species may lose important foraging habitat, which may in turn impact upon energy reserves as birds have further to travel to feed, and subsequently the bird’s ability to migrate, breed, forage or flush.</p> <p><u>Operational Phase:</u></p> <p>It is considered that there is no potential for adverse effects on these SCI species or relevant habitat during the Operational Phase, given the</p>	<p><u>Construction Phase</u></p> <p>See Mitigation Measures in Sections 4.4 and 4.5</p> <p><u>Operational Phase:</u></p> <p>No operational phase mitigation outside of the embedded mitigation included as a component of the design of the Proposed Development is deemed necessary.</p>

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Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
top sites in Ireland for wintering waterfowl.	species and their associated wetland habitat is therefore assessed further in this report.	embedded mitigation as a component of the design of this proposal in the form SuDS use which ensure all surface waters are diverted to bioretention and infiltration trenches or permeable paving and pass through fitted infiltration systems. While the primary reason for the instalment of these features is to protect surface water, these measures will also protect downstream SACs, and consequently this QI habitat. Mitigation is therefore not required to protect this QI during the Operational Phase of the Proposed Development.	

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4.3.2 Potential for In-combination Effects

4.3.2.1 Existing Planning Permissions

A search of planning applications located within a 300m radius of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie) and Dublin City Council Planning Applications online map (DCC 2023). Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

The larger developments within the vicinity of the Site are listed in Table 7 below:

TABLE 7. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 300 M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Grant Date	Distance from Proposed Development
4771/19	Dublin City Council	21/04/2020	0.36km NE
<p>Development Description</p> <p>Permission for the construction of a 1,680m² extension for warehouse use including all associated ancillary site works. The proposed extension will adjoin the existing building which is located at the Novum Building.</p> <p>Potential for In-combination effects</p> <p>None - this application expired on June 3rd, 2020, with no extension request on record, thus meaning works are either completed, or not going ahead under this permission. Therefore, adverse in-combination effects on any European Sites with the Proposed Development are not expected.</p>			
3159/22	Dublin City Council	23/03/2022	0.37km N
<p>Development Description</p> <p>Planning permission for the development will comprise the change of use of existing floor area (c.3,373 sq.m) within the existing building from warehousing/storage/light industry to office use with associated internal revisions to the building layout. Associated external works including to the existing southern elevation to facilitate a new building entrance, provision of additional car and cycle parking, alterations to internal road layout and walkways, provision of rooflights, removal of existing plant/storage and provision of new plant at ground and roof levels, provision of signage and all associated site works and demolitions, landscaping and services provision required to facilitate the development.</p> <p>Potential for In-combination effects</p> <p>None - The application is accompanied by a Preliminary Construction and Environmental Plan that details mitigation and best practices to avoid adverse effects on water courses and biodiversity. Further information was requested in relation to parking space allocations, to ensure compliance with Dublin City Development Plan 2016-2022. Therefore, adverse in-combination effects on any European Sites with the Proposed Development are not expected.</p>			
2847/21	Dublin City Council	02/09/2021	0.41km NE

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Development Description

The development will consist of:

1. Construction of 2.4m high, site security fencing to the perimeter of the 3 no. Abbvie Clonshaugh sites (B1, B2 & B3), to include new vehicular access gates, pedestrian swing gates, CCTV camera & security lighting poles, landscaping and associated works.
2. Construction of new 2,267 sqm concrete hard standing yard to the rear (North) of Building 1 (Site B1), new concrete retaining wall, landscaping and associated works.

Potential for In-combination effects

None - The application includes a full suite of SuDS measures as a condition, as well as a requirement for surface water attenuation to 2L/s and a petrol interceptor. With these measures in place, this application is highly unlikely to result in significant in-combination effects on any European Sites with the Proposed Development.

3641/21	Dublin City Council	06/04/2022	0.66km E
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Development Description

Permission for development on a site at Clonshaugh Business and Technology Park, Dublin 17. The subject site (with an area of c. 3.75 ha) comprises the site of former Units 15 and 16 (previously demolished) and the former Ricoh Building. The site is located to the north of the Santry River and the R104 Oscar Traynor Road, to the west of Clonshaugh Road, and to the south and east of existing estate roads.

Potential for In-combination effects

None - This application is accompanied by an EclA and AA screening. The EclA states that "*There are no predicted in-combination effects ... given that the [application] is unlikely to have any adverse effects on the surrounding environment*". The AA similarly states that "*There are no predicted in-combination effects ... given that the [application] is unlikely to have any adverse effects on any Dublin Bay European Sites*" and that this application, individually or in-combination with other plans or projects will not have a significant effect on a European Site.

It should be noted that the AI request for this application includes a request for an analysis of cumulative impacts, however this is understood to relate to the nature of the development as a datacentre, as the authority notes there are a number of similar developments existing and permitted in the Clonshaugh Technology & Business Park. Although this development is located in close proximity to the Santry, considering the above it is deemed that there exists no potential for in-combination effects with this application and the Proposed Development.

3351/22	Dublin City Council	19/04/2022	0.77km E
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Development Description

Planning permission at: property adjacent and generally south of "The Range" store, Clonshaugh Road, Coolock, Dublin 17, for amendments to the permitted, licensed, foodstore as granted under ABP reference ABP-310695-21 (Dublin City Council Reference 3865/20). The amendments include: a revised car parking layout with spaces reduced from 78 to 70 spaces to accommodate a relocated trolley bay and one of the cycle parking areas to positions within the car park area. The movement of the bin storage cage to the northern side of the HGV service ramp and ESB substation building is relocated to

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a point at the south of the store. The overall gross floor area of the store increases from 2.349sqm to 2,377sqms. The net sales area increases from 1643sqms to 1655sqms. There is a small increase in the ridge height of the building by circa. 330mm. The amendments to the foodstore include revised layouts for the welfare/customer toilets/operation office; revised freezer/bakery preparation area; a proposed "Deposit Return Scheme" (DRS) room; IT and plant rooms relocated; revised entrance "pod" and the relocation the external poster display board. There are also some minor changes to the water supply, foul and surface water drainage network within the site and an increased attenuation area. The proposal includes all works to facilitate the completion of the development subject to the above amendments.

Potential for In-combination effects

None - This application is accompanied by an AA Screening that concludes there are no potential effects on any European Sites from the development. The Application also includes a CEMP with measures to prevent contamination of surface and foul waters. Therefore, adverse in-combination effects on any European Sites with the Proposed Development are not expected

3325/24	Dublin City Council	31/05/2024	0.15km E
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Development Description

For a new first floor extension with pitched roof to the rear of the existing house over the existing single storey extension. A new single storey flat roofed ground floor extension to the rear of the existing single storey extension. Plus, all associated site works.

Potential for In-combination-effects

None - although the subject site is located circa 5.0 km from the North Dublin Bay SAC bad North Bull Island SPA and 6 km (approx.) from Baldoyle Bay SAC and SPA an appropriate assessment screening and EclA was undertaken for this work which concluded the following.

Appropriate Assessment:

Having regard to:

- The small scale and domestic nature of the development
- The location of the development in a serviced urban area so that any construction surface water runoff will be managed via the existing drainage system,
- The consequent absence of a pathway to the European sites,

It is considered that the proposed development would not be likely to have a significant effect individually, or in combination with other plans and projects, on the Natura 2000 network and appropriate assessment is not therefore required.

EIAR: Having regard to the nature of the development comprising a rear ground and first floor extension to a house, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore be excluded at preliminary examination and a screening determination is not required.

WEB1072/20	Dublin City Council	24/02/2020	0.23km E
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Development Description

The development will consist of domestic extensions to the existing dwelling incorporating 1.) A single story extension to the side consisting of a new garage and utility room. This will include the demolition and reconstruction of the existing boundary wall on the public road 2.) A single story extension to the rear consisting of a new open plan kitchen area 3.) A single story extension to the side consisting of a new bedroom and en-suite. This will include the removal of the existing boundary fence shared with the neighbours and the construction of a new block wall boundary in its place. All of the above together with all associated site works.

Potential for In-combination-effects

None – the application was declared invalid in 2020 and there have been no further updates.

4754/22	Dublin City Council	24/03/2023	0.25km S
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Development Description

Permission to extend living room and entrance hall with pitched roof over in addition we propose to demolish existing East facing gable shed and replace with a single story ground floor extension with flat roof over.

Potential for In-combination-effects

None – the development has been screened for AA. It has been found that significant effects are not likely to arise, either alone or in combination with other plans and projects that will result in significant effects to any Natura 2000 area.

4.3.2.2 Relevant Policies and Plans

The local policies and plans were reviewed and considered for possible in-combination effects with the Proposed Development. The County Development Plan has directly addressed the protection of European sites through specific policy objectives as outlined in Section 2.2.1. These policies ensure that no new development will give rise to significant effects on any European sites, either individually or in-combination with other plans or projects (except in the rare cases where imperative reasons of overriding public interest exist). In addition, sustainable development including SuDS measures for all new developments is inherent in the objectives of all development plans within the Greater Dublin Area.

Furthermore, the Dublin City Biodiversity Action Plan (see Section 2.2.2) is set out to protect and improve biodiversity and thus will not result in negative in-combination effects with the Proposed Development. Therefore, no in-combination effects are expected with the relevant policies and plans.

4.4 Avoidance and Mitigation Measures

The following sections outline the avoidance and mitigation measures identified to eliminate the potential for significant adverse impacts on the relevant European sites. Once the recommended measures outlined in the following sections are implemented in full, no adverse impacts on the relevant European sites or their QIs/SCIs are anticipated as a result of the Proposed Development. These mitigation measures will be included in a Construction and Environmental Management Plan (CEMP) that will be prepared prior to commencing works by the appointed construction contractor.

4.4.1 Summary of Potential Effects

Potential significant effects arising from the **Construction Phase** include:

- Water quality impacts potentially affecting North Bull Island SPA and North Dublin Bay SAC, arising in the event of surface water run-off / pollutant spills during construction.

There were no significant effects identified as potentially arising from the Operational Phase

The following mitigation and enhancement measures will ensure no significant effects arise on designated sites as a result of the Proposed Development, either alone or in-combination with other projects.

4.4.2 Construction Phase

To ensure that no contaminated waters containing silt, fuel, cementitious materials etc., have the potential to enter the Santry River during the Construction Phase of the Proposed Development, a suite of mitigation measures will be put in place and implemented.

The following section details the proposed surface water management for the Site during the Construction Phase, which will ensure the likelihood of inadvertent releases of pollutants into the Santry that could cause significant impacts at downstream European sites is **negligible**.

4.4.2.1 Mitigation 1: Surface Water Protection Measures

All works carried out as part of the Proposed Development will comply with all Statutory Legislation including the Local Government (Water Pollution) acts, 1977 and 1990 and the contractor will cooperate fully with the Environment Section of Dublin City Council in this regard.

Personnel working on the Site will be trained in the implementation of environmental control and emergency procedures. Procedures and relevant documents produced will be formulated in consideration of standard best international practice including but not limited to:

- CIRIA, (2001), Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors;
- Construction Industry Research and Information Association (CIRIA) Environmental Good Practice on Site (C650), 2005;
- BPGCS005, Oil Storage Guidelines;
- UK Pollution Prevention Guidelines (PPG) UK Environment Agency, 2004;
- Construction Industry Research and Information Association CIRIA C648: Control of water pollution from linear construction projects: Technical guidance (Murnane et al. 2006);
- CIRIA C648: Control of water pollution from linear construction projects: Site guide (Murnane et al. 2006); and
- Inland Fisheries Ireland (2016). Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters.

The following standard operational measures will protect surface water and groundwater during the Construction Phase of the Proposed Development:

- No direct discharges will be made to surface water drains where there is potential for cement or residues in discharges.
- Designated impermeable cement washout areas must be provided.
- A regular review of weather forecasts of heavy rainfall will be conducted, and a contingency plan will be prepared for before and after such events to minimise any potential nuisances. As the risk of the break-out of silt laden run-off is higher during these weather conditions, no work will be carried out during such periods where possible.
- Any imported materials will, as much as possible, be placed on Site in their proposed location and double handling will be avoided. Where this is not possible designated temporary material storage areas will be used.
- These temporary storage areas will be located at least 10m away from any surface water features and will be surrounded with silt fencing to filter out any suspended solids from surface water arising from these materials.
- Specific areas for storage, delivery, loading/unloading of materials will be designated, which will have appropriate containment/spill protection measures where required
- Leachate generation from stockpiles or waste receptacles will be prevented by using waterproof covers.
- All containment and treatment facilities will be regularly inspected and maintained.
- Prolonged exposure of contaminated soils or groundwater to the atmosphere will be avoided where practical or unnecessary.
- Appropriate bunding, storage and signage arrangements for all deleterious substances will be used.
- Robust and appropriate Spill Response Plan and Environmental Emergency Plans will be implemented for the duration of the works.
- Control measures and spill clean-up equipment adequate to treat spills at the Site will be available and staff will be trained and experienced in using said equipment.
- A register will be kept of all hazardous substances either used onsite or expected to be present. The register shall be available at all times and shall include as a minimum: valid safety sheets; Health & Safety, environmental controls to be implemented when storing, handling, using and in the event of spillage of materials; emergency response procedures/precautions for each material; the Personal Protective Equipment (PPE) required when using the material.
- All existing services will be mapped, and a plan will be put in place to decommission/divert and manage any drains or sewers which are associated with the Site.
- A plan for dealing with any unknown drains or services which may be encountered during the works will be set out and implemented.
- Any drains or sewers which could act as pathways for contamination from the Site will be blocked where required.

The above measures will be incorporated into the Construction and Environmental Management Plan (CEMP) for the Site.

4.5 Monitoring

4.5.1 Construction Phase

During the Construction Phase, the following monitoring will be carried out by the construction contractor to ensure the implemented mitigation measures are maintained effectively:

- Surface water and groundwater protection measures (Mitigation 1) will be checked weekly to ensure they remain effective, and more often during moderate to heavy rainfall events as appropriate.

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5 CONCLUSION

This Natura Impact Statement details the findings of the NIS conducted to further examine the potential direct and indirect impacts of the Proposed Development planning application at Larch Hill Estate, Coolock, Dublin 17, on the following European sites:

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006)

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The AA investigated the potential direct and indirect effects of the proposed works, both during construction/infill and operation, on the integrity and qualifying interests of the above European site, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European site(s), individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings in of this NIS, **it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the QIs, SCIs and on the integrity and extent of North Dublin Bay SAC (000206) and North Bull Island SPA (004006).** Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site.

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