



PROPOSED RESIDENTIAL DEVELOPMENT AT 794, 796 AND 798 HOWTH ROAD, RAHENY, DUBLIN 5.

Appropriate Assessment (AA) Screening and Natura Impact Statement (NIS) Report

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October Two Ltd

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1 INTRODUCTION

1.1 Background

DNV was commissioned by October Two Ltd to prepare an Appropriate Assessment Report for the Proposed Residential Development at 794, 796 and 798 Howth Road, Raheny, Dublin 5, hereafter referred to as 'Proposed Development' or 'Site', when referring to the application Site area.

This report contains information to enable the Competent Authority to undertake Stage 1 Appropriate Assessment (Screening) and Stage 2 Appropriate Assessment – Natura Impact Statement (NIS) in respect of the Proposed Development.

1.2 Quality Assurance and Competence

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants SOD, BS and CM who are the authors of this report.

SOD holds an honours degree in Zoology from University College Dublin and a Masters in Advanced Wildlife Conservation in Practice from the University of the West of England, Bristol. Shea has experience in habitat survey and assessment in a range of terrestrial, freshwater and coastal environments, surveys for protected species including bats, otter, newts, freshwater pearl mussel, crayfish and badger as well as surveys for invasive flora species. In his role as an ecologist, Shea advises clients and contractors in relation to appropriate mitigation strategies for protected species, such as bats, badger and amphibians and, where required, applies on behalf of the client for necessary derogation licenses. Shea is also experienced in providing ecological services at the construction phase of development to ensure compliance with relevant planning conditions. Throughout his career as an ecologist, Shea has been project manager and lead author on a range of projects including tourism, industrial, residential, and renewable energy developments as well as multiple large scale, national infrastructure projects.

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 screenings and has supported in the preparation of various ecological reports.

1.3 Description of Proposed Development

1.3.1 Site Location

The Site is located at 794, 796 and 798 Howth Road, Raheny - Greendale, Dublin 5, D05RT99 and D05HK76. The Site is bound to the north, east and west by residential and commercial properties. The Regional Road R105 abuts the southern section of the Site. On the opposite side of this road (18m south of the Site) lie the transitional waters associated with Bull Island and the coastal waters of the Irish Sea. Bull Island is also a Special Protection Area (SPA); North Bull Island SPA (004006) (Figure 1. Site Location).

1.3.2 Proposed Development Description

October Two Ltd. intends to apply for planning permission for development on lands of c. 0.505ha at 794, 796 and 798 Howth Road, Dublin 5, D05KP65, D05HK76, D05RT99.

The development will consist of the demolition of the 3 no. existing two-storey houses (of c. 233.7 sqm, c. 234.4sqm and c. 172.5 sqm respectably) and associated outbuildings, and the construction of a new residential development in 2 no. new build blocks, Block A and Block B, ranging between 3 and 5 storeys in height over single basement level. The development consists of 58 no. residential units (20 no. 1 bed units, 29 no. 2 bed units, and 9 no. 3 bed units), associated residential amenity space, ancillary plant, refuse and bicycle parking storage.

The overall development proposal provides for the following: -

Block A (c. 3312.1sqm GFA) – 5 storeys and shall consist of 40 no. units (15 no. 1 bed units, 16 no. 2 bed units, and 9 no. 3 bed units) with associated balconies, and access cores.

Block B (c. 1481.7 sqm GFA)- 3 storeys and shall consist of 18 no. apartment units (5 no. 1 bed units, and 13 no. 2-bed units) with associated balconies and access cores.

Each residential unit has an associated area of private open space in the form of balconies.

The development shall also provide for the provision of vehicular and pedestrian access off Howth Road; 35 no. car parking spaces at basement level - (including 2 no. designated accessible spaces and 18no. EV charging spaces), 2 no. motorcycle parking spaces, 135 no. bicycle parking spaces (105 no. resident spaces, 30 no. visitor spaces), refuse and recycling storage facilities, ESB substation and switch room, bicycle store, and plant and storage rooms.

The site development and infrastructural works provide for water, foul and surface water drainage and all associated connections; all ESB connections/infrastructure and site service connections; all landscaping and public lighting; all boundary treatment works; internal walkways and hard landscaping; and all associated site clearance, demolition, and development works necessary to facilitate the development of the site.



FIGURE 1. SITE LOCATION.



FIGURE 2. SITE GROUND FLOOR PLAN (NBDA ARCHITECTS, 2026A)



FIGURE 3. PROPOSED DEVELOPMENT BLOCK A ELEVATIONS (NBDA ARCHITECTS, 2025B)

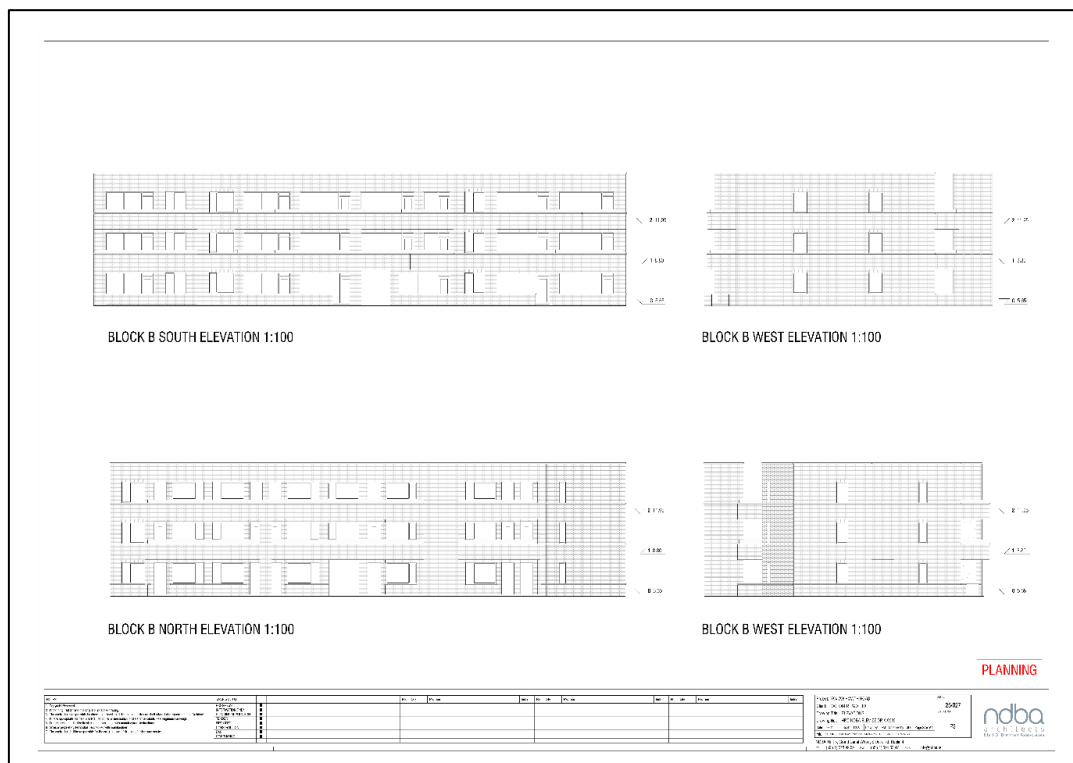


FIGURE 4. PROPOSED DEVELOPMENT BLOCK B ELEVATIONS (NBDA ARCHITECTS, 2025C)

1.3.3 Construction Phase Details

The Construction Phase of the Proposed Development is anticipated to begin within 3 months of receipt of granted planning permission and is expected to last for approximately 18 months in duration.

The sequence of construction is proposed as follows:

- All existing live services will be located and terminated at source.
- Prior to any works a dilapidation and an Asbestos survey to be carried out.
- Careful demolition and removal of existing houses.
- Assemble safe security access points and hoarding
- Carry out earthworks including the excavation of soils and subsoils
- Laying of foundations
- Installation of fixed and mobile cranes
- Installation of storm water attenuation infrastructure
- Construction of both blocks, Block A and Block B
- Works to Howth Road including connections to public services
- Fit out
- Landscaping and external finishes

1.3.4 Operational Phase Details

The Proposed Development will comprise a residential amenity consistent with the neighbouring land use in the area. Operational Phase drainage and foul water details are provided below.

1.3.5 Drainage and Water Supply

1.3.5.1 Surface water

Existing and proposed surface water and foul water service layouts are described under the following headings and are presented in Figure 5.

Existing Surface Water Drainage

There are no surface water sewers in the immediate vicinity of the site. The nearest public surface water line is 200m to the southwest in Howth Road. The Site is located c. 18m from Dublin Bay Marine waterbody. The current road gullies in Howth Road discharge directly to sea.

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Proposed Surface Water Drainage

100% of storm flow from impervious surfaces of the proposed development will discharge into the storm network. This will be provided with attenuations systems made up of appropriate SuDS features included in the SuDS strategy including:

- Extensive Green/ Blue roofs
- Permeable pavement
- Flood storage tank
- Bypass interceptor

It is proposed to discharge the stormwater to the sea, with a headwall and non-return flap, while providing a volume storage for the 6-hour, 1:100 year recurrence storm in the onsite tank. This storm size was chosen for storage before the discharge as the outfall pipe may become surcharged by the high tides that coincide with storm events. High tide lasts for a maximum 5 hours and during the coinciding storm event. The site will discharge after the tide recedes.

Garland investigated the need for a marine area consent/discharge license for the proposed discharge to the sea. In correspondence with the Marine Area Regulatory Authority (Irish national marine authority), it was confirmed that no marine area consent will be necessary as none of the infrastructure proposed extends into the marine zone. Therefore, the associated infrastructure and the effluent fall under the jurisdiction of the local authority (Dublin City Council).

The outfall will also be an unrestricted one as it discharges directly to the sea.

Stormwater from the basement, it is designed to be pumped and discharged to the foul sewer network. This will only be for incidental drainage occurring in the basement.

The location and layout of the above listed SuDS features are shown in Figure 5.

1.3.5.2 Foul Drainage

Existing Foul Drainage

There is an existing 600mm and 1500mm diameter public wastewater sewer running along the beach side of Howth Road in front of the development (see Figure 6).

Proposed Foul Drainage

It is proposed to provide a single gravity foul sewer system to serve the current proposed development. The foul sewerage from the overall development is planned to discharge, to the existing foul network running across the front of the development down Howth Road as shown in Figure 5 and



below. Foul waters ultimately drain to Dublin Bay via Ringsend Wastewater Treatment Plant (WwTP).

A pre-connection enquiry was lodged with Uisce Éireann for the development. The Irish Water reference number for this application is CDS25008959. This application was undertaken to determine whether there is sufficient capacity in the public foul sewer network to meet a previous demand of 58 units.

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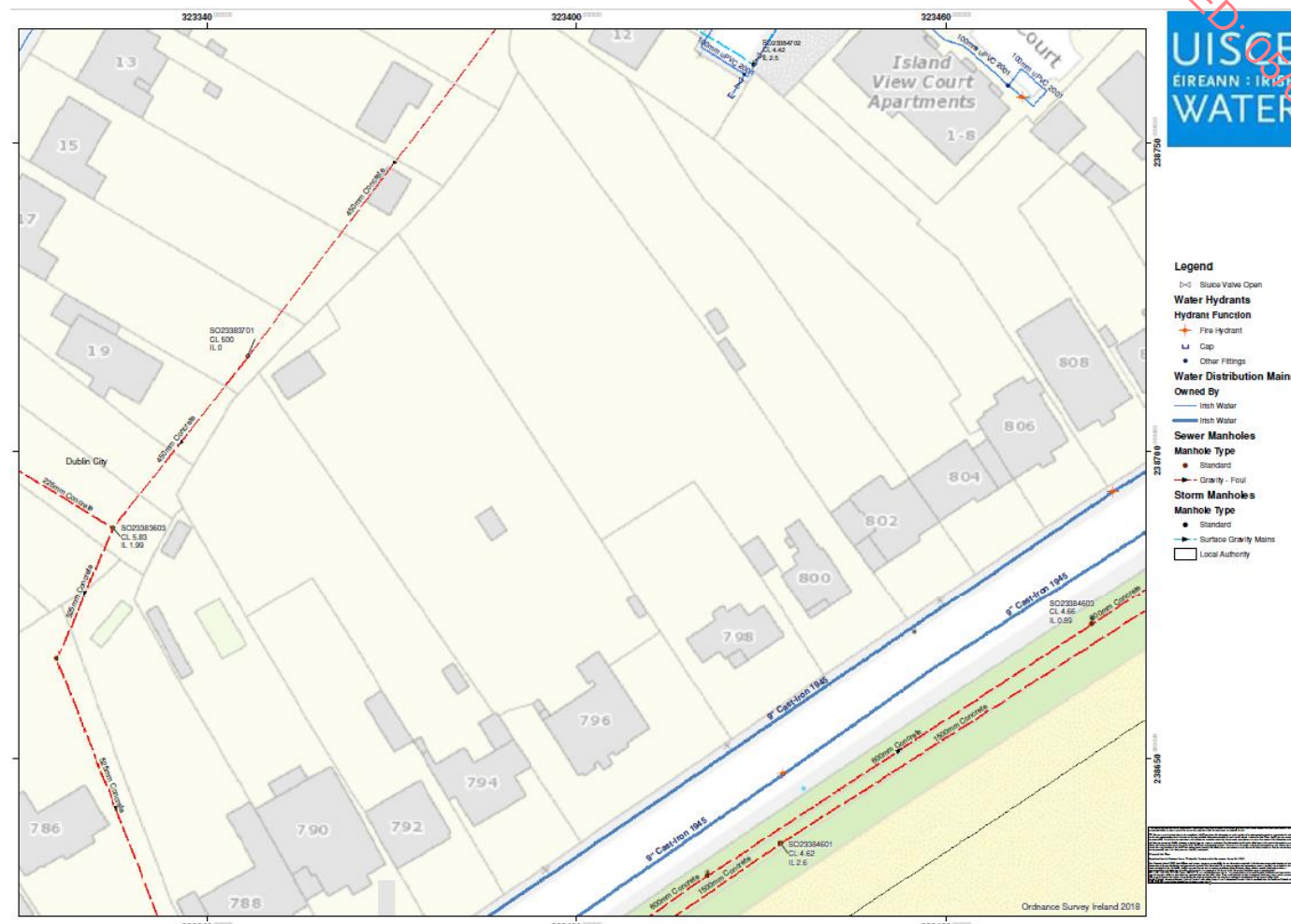


FIGURE 6. EXISTING FOUL WATER LAYOUT, GARLAND (2026)

1.4 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 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 the Natura 2000 Network, a network of protected sites throughout the European Community. These designated sites are referred to as “Natura 2000 sites” 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 AA is a required assessment to determine the likelihood of significant effects, based on best scientific knowledge, of any plans or projects on European sites. A screening for AA determines whether a plan or project, either 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.

This AA Screening has been undertaken to determine the potential for significant effects on relevant European sites. The purpose of this assessment is to determine, the appropriateness, or otherwise, of the Proposed Development in the context of the conservation objectives of such sites.

1.4.1 Legislative Context

The obligations in relation to AA have been implemented in Ireland under the Planning and Development Act 2000 (as amended), and the Planning and Development Act 2024. While the 2024 Act has been signed into law, the Planning and Development Act 2000 (as amended) will continue to apply until repealed and the new provisions commenced by way of Ministerial Order. The phased commencement of the new Planning and Development Act is expected to take place up to early 2026.

The obligations in relation to AA covered within both Acts are summarised below:

- The competent authority must carry out screening for AA for all relevant plans and projects, to determine whether the plan or project, in view of best scientific knowledge, is likely to have a significant effect on any European site;
- Where potential for likely significant effects cannot be ruled out, either as a result of the plan or project alone or in-combination with other plans or projects, or where uncertainty exists, the competent authority must determine that an AA is required. In this case, a more detailed examination of the relevant European sites shall be carried out, and a Natura Impact Statement must be prepared.

For further details on both the 2000 Act (as amended) and the 2024 Act, please refer to irishstatutebook.ie

1.4.2 Relevant Case Law

According to the ruling delivered in open court in Luxembourg on 15th June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

“In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site”.

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS) in large-scale residential developments), that are incorporated into the design of a proposal or project and

which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is not to protect a European site, are permitted for consideration during the undertaking of AA.

1.5 Policy Context

1.5.1 Dublin City Development Plan 2022 – 2028

Policies 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.

1.5.2 Dublin City Biodiversity Action Plan 2021 – 2025

Dublin City Biodiversity Action Plan 2021 – 2025 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.

1.6 Stages of Appropriate Assessment

This AA Screening Report (the 'Screening Report') has been prepared by DNV. It considers whether the Proposed Development is likely to have a significant effect on a European site and whether a Stage 2 AA is required.

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 effects 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 effects 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 AA Screening Methodology

2.1 Guidance

This Screening Report 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* Brussels, 28.9.2021 C (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.*

2.2 Screening Steps

Screening for AA involves the following steps:

- Establish whether the plan or project is directly connected with or necessary for the management of a European site;
- Description of the baseline existing environment at the Site of the Proposed Development;
- Identification of relevant European site(s) potentially affected;
- Identification and description of potential effects on the relevant European site(s);
- Assessment of the likely significance of the effects identified on the relevant European site(s);
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the European site; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

It should be noted that 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 considered** as part of this Screening Report.

2.3 NIS Steps

This NIS has been prepared following the steps described below:

- Review and description of available data for the relevant European site(s) potentially affected as identified in Stage 1 AA;
- Identification and description of potential effects on the relevant European site(s) and their designated QIs/SCIs, as identified in Stage 1 AA;

- Assessment of the likely significance of any effects 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/SCIs; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects once mitigation measures are adhered to.

2.4 Desk Study

A desktop study was carried out to collate and review available information, datasets and documentation sources relevant for the completion of this Screening Report. The desktop study, undertaken in December 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.gis.ie;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the Dublin City Council online planning database (www.dublincity.ie) and the National Planning Database (DHLGH, 2024); and
- Information on the extent, nature and location of the Proposed Development, provided by the applicant and their design team.

For a complete list of the documents consulted as part of this assessment, see section 5.

2.5 Field Surveys

To determine the likely ecological constraints at the Site, a multidisciplinary walkover survey was carried out on 19th June 2025. The purpose of this survey was to ground truth the previous surveys carried out at the Site on 6th December 2023 and 31st October 2024 and assess what changes if any have occurred since the last. In addition, the house and garden at the additional property, 794, was also walked and surveyed on June 19th. Any changes relevant to this assessment are included within this report. These surveys covered the following aspects:

- Habitat mapping to level 3 (Fossitt 2000);
- Preliminary Bat Roost Assessment (including internal building inspection) and Habitat Suitability Survey;
- Bird Scoping Survey;
- Invasive Flora Survey and,
- A search for signs of protected fauna (e.g., mammals, reptiles, amphibians).

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

Survey	Surveyor	Dates
Most recent updated Site walkover including bird Scoping Survey	SOD (DNV)	19 th June 2025
Second Site walkover including bird Scoping Survey	SOD (DNV)	31 st October 2024
Site walkover including bird Scoping Survey	SOD (DNV)	6 th December 2023

2.6 Identification of Relevant European sites

The Zone of Influence (ZOI) for a project is the area over which ecological features may be affected by changes as a result of a development and associated activities. This is likely to extend beyond the development site, for example where there are ecological or hydrological links beyond the site boundaries (CIEEM, 2018). Furthermore, ZOI in relation to European sites is described as follows in the 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021):

"The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km)."

Thus, to identify the European sites that potentially lie within the ZOI of the Proposed Development, a Source-Path-Receptor (S-P-R) method was adopted, as described in OPR PN01 (OPR 2021). This note was published to provide guidance on screening for AA during the planning process, and although it focuses on the approach a planning authority should take in screening for AA, the methodology is also readily applied in the preparation of Screening Reports such as this.

The relevant European sites were identified based on the following:

- Identification of potential sources of effects based on the Proposed Development description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by SCI bird species outside of their designated SPAs);
- Use of up-to-date GIS spatial datasets for European designated sites and water catchments – downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) to identify European sites which could potentially be affected by the Proposed Development; and
- Identification of potential pathways between the Site of the Proposed Development and any European sites within the ZOI of any of the identified sources of effects.
 - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any European sites.
 - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any European sites.
 - Air and land connectivity assessed based on Proposed Development details and proximity to European sites.

- Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Defining the likely ZOI based on the identified sources of effects and potential pathways between the Proposed Development and any European sites.

2.7 Assessment of Significant Effects

The conservation objectives of the European sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed Development has the potential to result in likely significant effects (LSEs) on any of the QIs and/or conservation objectives listed for the site.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., “*Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*”.

The potential for LSEs that may arise from the Proposed Development was considered through the use of key indicators:

- Habitat loss or alteration.
- Habitat/species fragmentation.
- Disturbance and/or displacement of species.
- Changes in population density.
- Changes in water quality and resource.

In addition, information pertaining to the conservation objectives of the European sites, the ecology of the designated habitats and species and known or perceived sensitivities of the habitats and species were considered.

2.8 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 Conservation 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.

2.9 Limitations

It is noted that no dedicated wintering bird surveys have been carried out on Site to date, as such, there is a lack of information on the usage of this site by wintering bird species. In light of this a precautionary approach has been adopted with regard wintering birds in this assessment.

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

3 STAGE 1 SCREENING ASSESSMENT

3.1 Existing Environment

3.1.1 Desk Study Results

3.1.1.1 Hydrology, Geology and Hydrogeology

The Site of the Proposed Development is within the Liffey and Dublin Bay catchment and the Mayne_SC_010 sub catchment (EPA, 2025).

The nearest waterbody to the Site is the transitional waterbody of North Bull Island which lies just 18m south of the Site. Following this, the next nearest waterbody to the Site is the Santry Stream.

The Santry Stream (ID: IE_EA_09S011100), a 2nd order Stream is located approximately 1.5km southwest of the Site and flows southwards discharging at Bull Island (EU Code: IE_EA_090_0100) located approximately 24m south of the Site at its nearest point (EPA, 2025).

The Santry Stream has been assessed as 'Poor' status and is considered 'At Risk' of not meeting its Water Framework Directives (WFD), while the North Bull Island transitional waterbody has been assessed as 'Moderate' status while its risk is currently 'Under Review' (EPA, 2025).

The EPA water quality monitoring data for the stations on the Santry Stream located closest to the Site is summarised in Table 2. The reported Q-value results indicate that water quality in the Santry Stream in the vicinity of the Site is poor (EPA, 2025).

TABLE 2. EPA MONITORING STATIONS AND ASSIGNED Q-VALUES

EPA Monitoring Station name	Station Code	Location from Site	Distance from Site	Assigned Q value
Bettyglen	RS09S011100	Northwest	1.5km	3 'Poor'

The Site of the Proposed Development is situated on the Dublin (IE_EA_G_008) groundwater body which was assigned a status of Good (EPA,2025). The aquifer type in the area is Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones (GSI, 2025). The groundwater rock units underlying the Site are classified as Dinantian Upper Impure Limestones. The level of vulnerability to groundwater contamination from human activities is Low throughout the Site (GSI, 2025). The subsoil is comprised of Till derived from Limestones (TLs). The bedrock beneath the Site is mapped as Dark limestone and shale ('calp) of the Lucan Formation (GSI, 2025).

The Waterbody Status for river, groundwater, transitional and coastal water bodies relevant to the Site as recorded by the EPA (2025) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003) are provided in Table 3.

TABLE 3. EPA RISK AND WATERBODY 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						

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
Santry Stream	IE_EA_09S_011100	North-west	1.5km	Poor	At risk	Closest Stream to the Site. No hydrological connection between the Site and this watercourse.
Transitional Water Bodies						
North Bull Island	IE_EA_090_0100	South	18m immediately south of the Site	Moderate	Under Review	Adjacent to the Site and downstream of the nearby Santry Stream
Coastal Water Bodies						
Dublin Bay	IE_EA_090_0000	South	1.5km immediately south of the Site	Good	Not at Risk	Adjacent to the Site and downstream of the nearby Santry Stream
Groundwater Bodies						
Dublin Groundwater Body	IE_EA_G_008	N/A	N/A	Good	Review	Underlying groundwater-body

3.1.2 Relevant Field Survey results

3.1.2.1 Habitats & Flora

The habitats present within the Site, as recorded in the survey area during the field survey.. Site photographs of these habitats are included in the EclA report accompanying this application and a map of the habitats is presented in Figure 7 below.

The majority of the Site consists of dry meadows and grassy verges (GS2) and amenity grassland (GA2) habitat. There are no waterbodies present on Site. Habitats are listed below:

- Amenity grassland (GA2);
- Buildings and artificial surfaces (BL3);
- Hedgerow (WL1);
- Dry meadows and grassy verges (GS2);
- Scrub (WS1);
- Treeline (WL2), and;
- Ornamental/ non-native shrub (WS3).

None of the above habitats are qualifying habitats of European Sites. The majority of the habitats recorded within the Proposed Development boundary are considered to be of low ecological value given the low species diversity, heavily managed and artificial/ornamental nature. These include Amenity grassland (GA2), Buildings and artificial surfaces (BL3) and Ornamental/ non-native shrub (WS3).

Other habitats present are valued as higher ecological importance given the diversity of species present and the value these habitats provide in the wider environment for local fauna.

No invasive species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011 as amended) were recorded within the Site however small

stands of plant species not listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011 as amended) were recorded within the Site consisting of snowberry (*Symphoricarpos albus*) and butterfly bush (*Buddleja davidii*).

3.1.2.2 Fauna

No signs of otter were recorded during the field survey and the Site does not contain suitable habitat for otter (*Lutra lutra*).

Several bird species were recorded within or adjacent to the Site as shown below. Most were green-listed species which are considered common and widespread throughout Ireland. However, one red listed and one amber listed species was recorded using the Site.

TABLE 4. RESULTS OF THE PRELIMINARY BIRD WALKOVER SURVEYS UNDERTAKEN AT THE SITE IN 2023 AND 2024 AND THE UPDATED SITE WALKOVER IN 2025

Species	Scientific Name	BoCCI Status	Activity (where applicable)
Blackbird	<i>Turdus merula</i>	Green	Flying within garden
Robin	<i>Erithacus rubecula</i>	Green	Flying within garden
Jackdaw	<i>Corvus monedula</i>	Green	Perched on building 796
Herring Gull	<i>Larus argentatus</i>	Red	Flying overhead
Rook	<i>Corvus frugilegus</i>	Green	Flying within garden
Starling	<i>Sturnus vulgaris</i>	Amber	Perched on building
Woodpigeon	<i>Columba palumbus</i>	Green	Flushed from hawthorn tree
Black-headed gull	<i>Chroicocephalus ridibundus</i>	Amber	Flying over building
Feral pigeon	<i>Columba livia domestica</i>	Green	Perched within treeline



FIGURE 7. MAP OF HABITATS PRESENT ON THE SITE (AS OBSERVED DURING THE SITE WALKOVER, 2025).

3.2 Identification of Relevant European Sites

3.2.1 Potential Sources of Impacts

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: 18 months*, beginning within 3 months of receipt of planning permission)

- Uncontrolled releases of silt, sediments and/or other pollutants to air due to construction;
- 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 lighting in the vicinity as a result of construction activity; and
- Increased human presence and activity as a result of construction activity.

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.
- Flightline/collision risk with bird species which may be using the area/migrating through.

3.2.2 Potential Pathways to European Sites

For the above listed potential sources of effects to have the potential to cause likely significant effects on any European site, a pathway between the source of potential effects (i.e., the Site of the Proposed Development) and the receptor is required. Potential impact pathways are discussed in the following sections in the context of the identified impact sources as identified in **Section 3.2.1**.

3.2.2.1 Direct Pathways

Hydrological Pathways

The Site is located 18m north of the North Bull Island transitional waterbody, and, subsequently the **North Dublin Bay SAC (000206) and North Bull Island SPA (004006)**. As a result, a hydrological pathway via surface water run-off down slope from the Site exists linking the Proposed Development to the various qualifying interests of the aforementioned European sites.

During Construction Phase, there will be earthworks required to excavate the foundations of the Proposed Development. Surface water generated during these excavation works will have the potential to run off-Site containing various forms of pollution such as silt and chemicals (oil, diesel, etc) and drain into a nearby stormwater drain or directly into the North Bull Island transitional waterbody during a rainfall event.

The existing buildings situated on Site will be demolished to make way for construction of the Proposed Development. During demolition, rubble from this existing building will be sorted into different materials on Site for collection by specialised waste management companies.

However, during the Construction/Demolition Phase, materials broken into particles such as concrete and gypsum have the potential to be washed away during rainfall events. These have the potential to flow into

nearby surface water drainage where they may discharge, via a stormwater overflow drain, into the adjacent transitional waterbody, which lies within the **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)** (EPA, 2024).

Similarly, surface/foul water drainage at the Site during the Operational Phase could impact on the above mentioned European Sites adjacent to the Proposed Development.

Hydrogeological Pathways

During groundworks and other construction activities, the ground will be exposed and any potential accidental discharges to ground could potentially migrate vertically downward to the underlying bedrock aquifer and laterally within the aquifer to the downgradient **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)** which lie just 18m south at its closest point.

No other European sites are linked to the Site via hydrogeological pathways due to the relatively small scale of the Proposed Development and the distance between the Site and the next nearest European site (ca. 3km north) after the aforementioned SAC and SPA.

Air and Land Pathways

The Construction Phase of the Proposed Development could introduce dust and noise impacts transferable via air and land pathways, as well as increased lighting and human activity at the Site and in the vicinity of the Site during the Construction and Operational Phases. The Site is located on the coast of the Irish Sea and is adjacent to the **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)**. Therefore, direct impact pathways via air and land exist between the Proposed Development and the aforementioned European sites.

No other European sites are linked to the Site via air and land pathways due to the relatively small scale of the Proposed Development and the distance between the Site and the next nearest European site (ca. 3km north) after the aforementioned SAC and SPA.

3.2.2.2 Indirect Pathways

Indirect Hydrological Pathways

During Operational Phase, foul water from the Proposed Development will flow to Ringsend WwTP for treatment. Under normal circumstances, wastewater is treated at Ringsend WwTP, though the plant under recent times has been known to exceed its capacity. However, upgrade works on the Ringsend WwTP are planned to be completed at the end of 2025.

However, foul water from the Site will cause a negligible accumulation to the overall foul water being processed at the plant. Should the capacity of the plant be exceeded there is an adequate buffer of marine waters beyond the plant's outfall to nullify significant impacts which the raw sewage may have on the nearby Dublin Bay European sites of **North Dublin Bay SAC (000206)**, **South Dublin Bay SAC (000210)**, **North Bull Island SPA (004006)** and **South Dublin Bay and River Tolka Estuary SPA (004024)**.

It should also be noted that an EIAR produced by Uisce Éireann in 2018 determines that significant effects, occurring as a result of a do nothing scenario in regards to the upgrading of the plant, are unlikely to have an effect on the Dublin Bay European sites (see Section 3.3.6.2).

Collision Risks

Given the size of the Site, the amount of hard standing and active usage of the grounds, significant usage by wintering birds is not expected. As such, wintering bird surveys were not carried out on Site. Despite this, indirect pathways (e.g., disruptions to migratory pathways) were considered on a precautionary basis given the proximity of the Site to **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)**.

Tall structures such as electrical pylons, wind farms and tall buildings can lead to fatal collisions with commuting bird species. This is particularly true for those species considered to be "poor" fliers, with relatively low manoeuvrability compared to other more agile bird species (see Eirgrid, 2012).

Some of the most at-risk groups (classified as 'medium' and 'high' collision risk species) include wader species; waterfowl such as geese, swan and duck species; and some raptor species. Gulls such as Black-headed Gull, Herring Gull and Lesser Black-backed Gull are classed as 'low' collision risk species due to their superior manoeuvrability when flying (Eirgrid, 2012).

Likelihood of Collision Impacts

From a review of available literature on the subject, bird collisions with man-made structures are common and well documented¹ with migratory passerine species the most prevalent collision victims². Bird collision with buildings is generally associated with reflective material such as windows or large surfaces of glass which create a mirror and appear to show the continuation of the sky or surrounding landscape, an effect that can be exacerbated by lighting.

In addition, the physical location of buildings and structures can influence the likelihood of bird collisions, with structures placed on or near areas regularly used by large numbers of feeding, breeding, or roosting birds, or on local flight path; such as those located between important foraging and roosting areas, can present a higher risk of collision.

The Site in itself is not deemed to represent suitable *ex-situ* feeding/roosting habitat for any such species (Habitats present largely comprise of recolonising rank grassland and treeline/scrub).

However, it should be noted that the Site is located along the coast, adjacent to **North Bull Island SPA (004006)** which is designated for the protection of wetland bird populations.

Building Height

With respect to Special Conservation Interest (SCI) species for SPAs within the zone of influence of the Proposed Development which regularly use or travel over inland areas (i.e. light bellied brent goose, gull species, duck species and a number of waders such as oystercatcher, godwit species or curlew), in Dublin they navigate the urban environment with built structures daily.

To put some context on some of their avoidance capabilities, in a different setting and for use in collision risk modelling for onshore wind turbines, an avoidance rate of 99.5% is applied for large gull species and an avoidance rate of 99.2% is applied for small gull species (Furness, 2019), which essentially means that 99.5% and 99.2% of gull flights, respectively, will avoid collision with a moving turbine. For Curlew the avoidance rate applied is 98% (SNH, 2018).

The risk of collision is even less with a static, clearly detectable building. The proposed buildings consist of glazing, broken up with a varied material composition interspersing any reflective areas. While the presence of the Proposed Development might alter flight patterns of bird species slightly to avoid the proposed building structures the risk of collision is extremely low.

The Proposed Development entails the construction of relatively low level residential buildings ranging in height from 3-5 storeys in height, and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be negligible (migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020)).

It is considered that birds that fly over the Site to commute between feeding grounds at various locations would fly lower than this, however, once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds would simply fly around or over them.

Building Appearance

Whilst the design of the facades of the apartments and neighbourhood centre buildings do include windows, as shown on the elevation drawings prepared by NDBA Architects for the proposed development no large surfaces of glass are proposed. Rather the overall façades of the proposed buildings are well broken up, with a varied material composition interspersing any reflective areas. These architectural design features provide important visible cues as to the presence and extent of the proposed

structures to any commuting/foraging bird species should they be in the vicinity of the Site. This overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is negligible. These architectural design features are part of the overall design of the Proposed Development and are not considered to represent specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard. It is noted that birds are not deemed to be at any particular risk of collisions with the proposed buildings at the Site.

As such, based on the heights of the proposed structures, their physical appearance and the nature of their location, it is deemed that birds including any 'at-risk' species, do not have the potential to be impacted by the Proposed Development in terms of collisions and the risk is therefore deemed to be **imperceptible** in the absence of any mitigation.

3.2.3 Relevant European sites

A European site will only be at risk from likely significant effects where a S-P- R link exists between the Proposed Development Site and the European site. All of the European sites considered under the S-P- R method are listed in Table 5, however only two European sites were identified to have a S-P- R link of note to the Proposed Development Site, namely the **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)**. These sites are highlighted in green in the below and shown in Figure 8.

TABLE 5. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. THOSE SITES WITH NOTABLE S-P-R LINKS ARE HIGHLIGHTED IN GREEN (IF ANY). QUALIFYING INTERESTS (QIS) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (EEA, 2024) .

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
Special Areas of Conservation (SAC)		
North Dublin Bay SAC (000206) Linear Distance to Proposed Development: 18m south	As per SDF update 10/2020 OR NPWS (2013a) Habitats Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] <i>Petalophyllum ralfsii</i> (Petalwort) [1395] <i>Spartina</i> swards [1320]	Direct hydrological, hydrogeological, and air/land pathways were identified, owing to the proximity of the Site to this European Site (18m at its closest point). The indirect hydrological pathways identified between the Site and this European Site due to Ringsend WwTP have been deemed insignificant due to distance and dilution factors.
Howth Head SAC (000202) Linear Distance to Proposed Development: 3.4km east/southeast	As per SDF update 10/2020 OR NPWS (2016) Habitats Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030]	No impact pathways identified due to intervening distance of >3km which would buffer any potential hydrological/hydrogeological and land/air pathways from

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
		the Proposed Development which is small in scale
Rockabill to Dalkey Island SAC (003000) Linear Distance to Proposed Development: 4km east/southeast	As per SDF update 10/2020 OR NPWS (2013b) Habitats Reefs [1170] Species <i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	No impact pathways identified due to intervening distance of >3km which would buffer any potential hydrological/hydrogeological and land/air pathways from the Proposed Development which is small in scale
South Dublin Bay SAC (000210) Linear Distance to Proposed Development: 5km south	As per SDF update 10/2020 OR NPWS (2013c) Habitats Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]	The indirect hydrological pathways identified between the Site and South Dublin Bay SAC, due to Ringsend WwTP, have been deemed insignificant due to distance and dilution factors.
Special Protection Areas (SPAs)		
North Bull Island SPA (000406) Linear Distance to Proposed Development: 18m south	Birds 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]	Direct hydrological, hydrogeological, and air/land pathways were identified, owing to the proximity of the Site to this European Site (18m at its closest point). The potential for flightline impacts on migratory/wintering bird species that are SCI species of this SPA were also identified, however following assessment have been deemed imperceptible. The indirect hydrological pathways identified between the Site and South Dublin Bay SAC, due to Ringsend WwTP, have been deemed insignificant due to distance and dilution factors.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
Howth Head SPA (004113) Linear Distance to Proposed Development: 3.4km east/southeast	Birds Kittiwake (<i>Rissa tridactyla</i>) [A188]	Hydrological via the Irish Sea, deemed insignificant due to distance. No indirect impact pathways to affect Kittiwake, as no suitable breeding/foraging habitats at the Site or within the ZOI for this species.
South Dublin Bay and River Tolka Estuary SPA (004024) Linear Distance to Proposed Development: 4.5km south	Birds Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] 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] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Wetland and Waterbirds [A999]	No impact pathways identified due to intervening distance of >3km which would buffer any potential hydrological/hydrogeological and land/air pathways from the Proposed Development which is small in scale. The indirect hydrological pathways identified between the Site and South Dublin Bay SAC, due to Ringsend WwTP, have been deemed insignificant due to distance and dilution factors.

3.3 Assessment of Likely Significant Effects

The following sections discuss the potential for likely significant effects on the relevant European site(s), taking into consideration the QIs, SCIs and SSCOs (where available), and assesses whether the Proposed Development has the capacity to adversely affect the integrity of this European site. Furthermore, due consideration shall be given to species not formally identified but which may be present within the Site and adversely effected by the Proposed Development, provided that those potential impacts are likely to affect the conservation objectives of the designated site. The potential for significant effects that may arise from the Proposed Development was considered through the use of key indicators as detailed in Section 2.7.

3.3.1 Habitat Loss and Alteration

No direct habitat loss or alteration is foreseen as a result of the Proposed Development, although it could occur indirectly as a result of changes in water quality and resource (see Section 3.3.3).

3.3.2 Habitat / Species Fragmentation

No direct habitat fragmentation or alteration is foreseen as a result of the Proposed Development, although it could occur indirectly as a result of changes in water quality and resource (see Section 3.3.3)

3.3.3 Changes in Water Quality and Resource

Section 3.2.2.1 identified that the Site has a hydrological pathway of note linking the Proposed Development to the nearby **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)** European sites.

During the Construction Phase of the Proposed Development there exists the potential for producing surface water run-off effluent during a rainfall event, which may include particles such as concrete and gypsum, or chemicals (oil/diesel) contaminated surface water and/or siltation. This run-off has the potential of entering the North Bull Island transitional waterbody pathway directly, or indirectly via surface water sewage overflow during a rainfall event where it may flow to the downstream European sites, namely: **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)**.

During the Operational Phase, there will be a lack of sources of pollution on Site compared to Construction Phase and also, there will be a number of preventative SuDS measures which will absorb surface water and retain it within its appropriate channels (see Section 1.3.5).

The Proposed Development includes an on-site surface water attenuation tank on Site to capture any excess surface water run-off from a large storm event, while remaining surface water will be connected via a new surface water pipeline to an existing surface water connection which discharges to sea. Foul water from the Site will connect to the existing foul network, where it will drain to Ringsend WWTP where it will be treated to a satisfactory environmental standard before being released (see Section 3.3.6.2).

In addition, during groundworks and other construction activities, the ground will be exposed and any potential accidental discharges to ground could potentially migrate vertically downward to the underlying bedrock aquifer and laterally within the aquifer to the downgradient European sites in Dublin Bay. It is noted that it is likely that the Dublin groundwater body underlying the Site discharges towards Dublin Bay. The groundwater vulnerability beneath the Site is classified by the GSI as Low.

The 'Dublin GWB: Summary of Initial Characterisation' document (GSI, 2024) states "*The general groundwater flow direction in this aquifer is towards the coast and also towards the River Liffey and Dublin City. This aquifer is not expected to maintain regional groundwater flow paths. Groundwater circulation from recharge to discharge points will more commonly take place over a distance of less than a kilometre. The majority of groundwater flow will be a rapid flow in to upper weathered zone but flow in conduits is commonly recorded at depths of 30 to 50 m b.g.l. . The aquifer is not considered to have any primary porosity and flow will be through fractures, some of which will have been enlarged by karstification and dolomitisation. The fissured nature and the moderate permeability of the bedrock close to the surface imply that water will move at high velocities*".

This statement indicates that water which is absorbed into the Dublin groundwater body will flow for less than a kilometre before it is discharged. Dublin Bay is located 18m south of the Proposed Development, as such, surface water from the Site has the potential to be absorbed, travel through and be discharged to the nearby Dublin Bay via the Dublin groundwater body.

Accounting for the above, significant water quality impacts as a result of the Construction of the Proposed Development **cannot be ruled out**.

3.3.4 Disturbance and / or Displacement of Species

While the Site does not contain suitable ex-situ habitat for these SCI species and is screened by the existing wall bounding the public path/road network and the Dublin Bay coastline, the Proposed Development will occur within 18m of **North Bull Island SPA** and therefore has the potential to disturb SCI species which may be present at the Site/in the vicinity.

It is noted that the SCI species of the SPA are all wintering species of waders, wildfowl and other waterbirds that have habituated to ongoing disturbance associated with daily activities associated with the heavily urbanised Dublin City, including associated human traffic and vehicles (cars, buses, etc.). However, the Construction Phase of the Proposed Development (particularly during demolition works) does have the potential to disturb these species, albeit over a short timeframe.

The previous sections have not ruled out the potential for habitat loss/alteration as-well as habitat and species fragmentation, as it was concluded these could occur as a result of water quality impacts arising from the Proposed Development.

Accounting for the above, the potential for significant disturbance and or displacement of species associated with the nearby **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)** European sites as a result of the Proposed Development, **cannot be ruled out** at this stage.

3.3.5 Changes in Population Density

As the previous section did not rule out the potential for water quality impacts, disturbance/displacement, habitat loss/alteration and habitat/species fragmentation owing to the Proposed Development.

Changes to the population density of species associated with the nearby **North Dublin Bay SAC (000206)** and **North Bull Island SPA (004006)** **cannot be ruled out** at this stage.

3.3.6 Potential for In-combination Effects

The following sections outline existing granted or pending planning permissions in the vicinity of the Proposed Development and assess the potential for adverse in-combination effects on any European sites.

3.3.6.1 Existing Planning Permissions

A search of planning applications located within a 300m radius 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. 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.

It is noted that the majority of the few developments within the vicinity of the Site of the Proposed Development are applications granted for the extension and alteration of existing dwellings. Some of which are shown in Table 6:

TABLE 6. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 300M OF THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
WEB1883/23	Dublin City Council	Permission Granted	46, Saint Margaret's Avenue, Dublin 5
Development Description Planning permission has been sought by Mike & Deirdre Hopkins (and subsequently granted) for demolition of existing single storey garage to rear & partial demolition of existing 2 storey side / rear extension & construction of a new dwelling part two storey part single storey attached to the side of existing dwelling, to include a new single storey extension & garden room to rear of existing dwelling, widening of existing vehicular access to front & all site & ancillary works at No. 46 St Margaret's Avenue, Dublin 5, D05 ET65.			
Potential for In-combination effects There was no screening required for this Development due to the low-intrusion nature of the Site works. This indicates that works will not have an impact on Natura 2000 sites and therefore will not act in-cumulation with the Proposed Development on which this report is based. It can therefore be concluded that this will not act to cause any in combination effects with this Proposed Development.			
3800/20	Dublin City Council	Permission Granted	806, Howth Road, Dublin 5, D05A060
Development Description The development will consist of: (i) Demolition of existing two storey dwelling, attached garage and sheds to the rear; (ii) Construction of 1 no. detached three storey 4-bedroom dwelling (House Type A) fronting Howth Road, featuring a one bedroom granny flat with own door access at ground floor level & front terrace at second floor; (iii) construction of 2 no. semi-detached two storey 3-bedroom dwellings (House Types B&C) to the rear of site. All houses are accessible off Howth Road via a shared internal driveway which provides access to 4 no. on-curtilage vehicular parking spaces (2 no. serving House A, 1 no. serving House B & 1 no. serving House C); (iv) Relocation and remodelling of the existing vehicular entrance off Howth Road; and (v) other works as part of the development include: rooflights, landscaping, boundary treatments, SuDS Drainage and all associated works necessary to facilitate development. A Natura Impact Statement (NIS) accompanies this application.			
Potential for In-combination effects The NIS Report for this development concluded that the measures set out in the NIS which are to be followed will substantially reduce the likelihood and magnitude of pollution events and disturbance thus preventing significant negative effects on the qualifying interests of the SAC and SPA. As a result, it is concluded that the proposed development will not cause significant negative impacts on the integrity of any Natura 2000 sites. The EclA also concluded that the development will not cause any significant negative impacts on designated sites, habitats, protected species or any other features of ecological importance. It can therefore be concluded that this will not act to cause any in combination effects with this Proposed Development.			
301798 (ABP)	Dublin City Council	Granted	Ringsend WWTP
Development Description 10-year permission for development of the Ringsend wastewater treatment plant upgrade project including a regional biosolids storage facility			
Potential for In-combination effects			

Planning Reference	Planning Authority	Status	Location
None envisaged, as these works are considered to provide an overall positive impact to wastewater treatment of the Dublin City area.			

3.3.6.2 Operation of Ringsend WwTP

This section addresses in more detail the general issue of potential in-combination effects with Ringsend WwTP arising from the Operational Phase of the Permitted Development and other Developments, including future developments.

In summary, the impact of the Permitted Development and any future development has already been appropriately considered and assessed as part of the application process for the existing planning permissions pertaining to Ringsend WwTP.

The 2012 Ringsend Wastewater Treatment Plant application for planning permission (Ref. PL.29N.YA0010) was for a PE of 2.4 million and was predicated on the findings of the 2005 GDSDS. The GDSDS set out the drainage requirements for the Greater Dublin Area (GDA) up to 2031. The GDSDS relied on the Regional Planning Guidelines (RPGs) and the National Spatial Strategy (NSS) in order to estimate the future projected population increases for the GDA. The studies indicated a predicted growth in population from 1.2 million in 2002 to just over 2 million in 2031 for the GDA region.

In June 2018 Irish Water applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WWTP facility. The first phase of upgrade works to Ringsend WWTP was completed in December 2021, which increased the capacity of the plant by 400,000 P.E. These works, together with the future works permitted will ultimately increase the capacity of the facility from 1.6 million P.E. to 2.4 million P.E. by 2025 (Irish Water website: <https://www.water.ie/projects/local-projects/ringsend/>).

Therefore, both the initially permitted 2012 upgrade and the permitted 2019 revised upgrade (Ref. ABP-301798-18) for Ringsend WwTP take account of population growth up to 2.4 million PE. Both applications were subject to EIA and therefore accompanied by an EIAR and accompanied by an AA screening report and NIS.

Notwithstanding the above, on an individual basis the Operational Phase of the Permitted Development will have an imperceptible effect on the habitats/species/qualifying interests listed within the relevant European sites specifically **South Dublin Bay and River Tolka Estuary SPA (004024)**, **North Bull Island SPA (004006)**, and **North Dublin Bay SAC (000206)**, in terms of flows, relative to the total amount of waste water currently being received at Ringsend WwTP.

Under the heading of "*Potential impact – Discharge of treated effluent, impacts on water quality, effects on qualifying interests*", the NIS (Irish Water, 2018b) for the Ringsend Wastewater Treatment Plant 2019 revised upgrade provides as follows:

*"In the operational phase, the proposed upgrade of the Ringsend WWTP Component will result in an increase in the plant capacity and also an improvement in the final effluent quality. This will result in a reduction in the licensed parameters discharged into the receiving water, with significantly reduced quantities in respect of ammonia and phosphorous."*³

This NIS goes on to state as follows:

³ Section 4.5.1 at page 32

*"Overall no significant adverse effects are foreseen and indeed, a slight positive effect is possible. Effects of discharge during the operational phase of the project from the upgrade project will therefore have imperceptible impact on habitats listed within these European sites."*⁴

In respect of this issue, the NIS concludes as follows:

*"Thus, there is no potential for in-combination impacts of any other plan and project with the Ringsend WWTP Component of the proposed Upgrade Project."*⁵

The EIAR for the ongoing upgrade at Ringsend WwTP (Irish Water, 2018a) also details the lack of any significant impacts to European sites observed as a result of the current stormwater overflow discharge levels at the WwTP. During storm events, once the capacities of the holding tanks are surpassed, the WwTP releases overflow via an outfall at Pigeon House Rd into the lower Liffey estuary.

The EIAR carried out in relation to said upgrade concluded that in the 'do nothing' scenario, i.e., wherein the upgrade is not carried out; the current existing levels of nutrient input to Dublin Bay as a result of stormwater overflow from the WwTP, are not deemed to pose significant threats to the integrity of European sites located within or adjacent to Dublin Bay, or any of their Conservation Objectives regardless of said upgrade.

The EIAR report acknowledges that under the do-nothing scenario *"the areas in the Tolka Estuary and North Bull Island channel will continue to be affected by the cumulative nutrient loads from the river Liffey and Tolka and the effluent from the Ringsend WwTP"*, which could result in a decline in biodiversity and the deterioration of the biological status of Dublin Bay (Irish Water, 2018a). Nevertheless, these negative impacts of nutrient over-enrichment are considered *"unlikely"*. This is because historical data suggests that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna. The EIAR notes that *"although a localised decline could occur, it is not envisaged to be to a scale that could pose a threat to the shellfish, fish, bird or marine mammal populations that occur in the area."* Furthermore, the EIAR notes that significant impacts on waterbird populations foraging on invertebrates in Dublin Bay due to nutrient over-enrichment are *"unlikely"* to occur. What is important to note is that the do-nothing scenario predicts that nutrient and suspended solid loads from the WwTP will *"continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity"* and that *"if the status quo is maintained there will be little or no change in the majority of the intertidal faunal assemblages found in Dublin Bay which would likely continue to be relatively diverse and rich across the bay."*

Therefore, it can be concluded that likely significant effects on marine biodiversity and the European sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely. Importantly, this conclusion is not dependent upon any future works to be undertaken at Ringsend. Thus, in the absence of any upgrading works, significant in-combination effects to European sites in this regard **are not deemed likely to arise**, and therefore likely significant effects involving foul waters produced by the Permitted Development also do not have the potential to occur.

It is therefore concluded that there is **no possibility for any significant in-combination effects** to European sites involving the Permitted Development

3.3.6.3 Relevant Policies and Plans

The local policies and plans detailed in Section 1.5 above were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA, and where potential for likely significant effects has been identified (e.g., in the case of the Dublin City Development Plan), an NIS has been prepared which identifies appropriate mitigation. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development.

⁴ Section 4.5.1 at page 33

⁵ Section 4.5.1 at page 34

The Dublin City Development Plan 2022-2028 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

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TABLE 7. SUMMARY OF IMPACT ASSESSMENT ON EUROPEAN SITES AS A RESULT OF THE PROPOSED DEVELOPMENT.

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-Combination effects	Stage 2 AA Required
SAC							
North Dublin Bay SAC (000206)	Yes	Yes	Yes	Yes	Yes	None	Yes
North Bull Island SPA (004006)	Yes	Yes	Yes	Yes	Yes	None	Yes

3.4 Stage 1: Screening – Conclusion

The Proposed Development at 794, 796 and 798 Howth Road, Raheny, Dublin, 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 **may not be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:

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

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly 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 the preparation of a NIS is required.**

4 STAGE 2: NATURA IMPACT STATEMENT

4.1 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 2024), Site Synopses (NPWS 2019a) and any supporting documents available for the relevant site(s).

4.1.1 North Dublin Bay SAC (000210)

The following descriptions of the **North Dublin Bay SAC (000210)** are extracted from the Site Synopsis (NPWS 2013) for the site:

"This site lies south of the River Liffey in Co. Dublin, and extends from the South Wall to the west pier at Dun Laoghaire. It is an intertidal site with extensive areas of sand and mudflats. The sediments are predominantly sands but grade to sandy muds near the shore at Merrion Gates. The main channel which drains the area is Cockle Lake."

*"The bed of Dward Eelgrass (*Zostera noltii*) found below Merrion Gates is the largest stand on the east coast. Green algae (*Enteromorpha* spp. and *Ulva lactuca*) are distributed throughout the area at a low density. Furoid algae occur on the rocky shore in the Maretimo to Dún Laoghaire area. Species include *Fucus spiralis*, *F. vesiculosus*, *F. serratus*, *Ascophyllum nodosum* and *Pelvetia canaliculata*."*

*"Several small, sandy beaches with incipient dune formation occur in the northern and western sectors of the site, notably at Poolbeg, Irishtown and Merrion/ Booterstown. The formation at Booterstown is very recent. Drift line vegetation occurs in association with the embryonic and incipient fore dunes. Typically drift lines occur in a band approximately 5 m wide, though at Booterstown this zone is wider in places. The habitat occurs just above the High Water Mark and below the area of embryonic dune. Species present are Sea Rocket (*Cakile maritima*), Frosted Orache (*Atriplex laciniata*), Spear-leaved Orache (*A. prostrata*), Prickly Saltwort (*Salsola kali*) and Fat Hen (*Chenopodium album*). Also occurring is Sea Sandwort (*Honkenya peploides*), Sea Beet (*Beta vulgaris* subsp. *maritima*) and Annual Sea-blite (*Suaeda maritima*). A small area of pioneer saltmarsh now occurs in the lee of an embryonic sand dune just north of Booterstown Station. This early stage of saltmarsh development is here characterised by the presence of pioneer stands of glassworts (*Salicornia* spp.) occurring below an area of drift line vegetation. As this is of very recent origin, it covers a small area but ample areas of substrate and shelter are available for the further development of this habitat."*

*"Lugworm (*Arenicola marina*), Cockles (*Cerastoderma edule*) and annelids and other bivalves are frequent throughout the site. The small gastropod *Hydrobia ulvae* occurs on the muddy sands off Merrion Gates."*

"At low tide the inner parts of the south bay are used for amenity purposes. Baitdigging is a regular activity on the sandy flats. At high tide some areas have windsurfing and jet-skiing. This site is a fine example of a coastal system, with extensive sand and mudflats, and incipient dune formations. South Dublin Bay is also an internationally important bird site."

4.1.2 North Bull Island SPA (004006)

The following descriptions of the **North Bull Island SPA (004006)** are extracted from the Site Synopsis (NPWS 2014) for the site:

"This site covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head."

"The North Bull Island SPA is of international importance for waterfowl on the basis that it regularly supports in excess of 20,000 waterfowl. The site supports internationally important populations of three species, Light-bellied Brent Goose (1,548), Black-tailed Godwit (367) and Bar-tailed Godwit (1,529) - all figures are mean

peaks for the five winters between 1995/96 and 1999/2000. The site is one of the most important in the country for Light-bellied Brent Goose. A further 14 species have populations of national importance – Shelduck (1,259), Teal (953), Pintail (233), Shoveler (141), Oystercatcher (1,784), Grey Plover (517), Golden Plover (2,033), Knot (2,837), Sanderling (141), Dunlin (4,146), Curlew (937), Redshank (1,431), Turnstone (157) and Black-headed Gull (2,196). The populations of Pintail and Knot are of particular note as they comprise 14% and 10% respectively of the all-Ireland population totals.”

The North Bull Island SPA is an excellent example of an estuarine complex and is one of the top sites in Ireland for wintering waterfowl. It is of international importance on account of both the total number of waterfowl and the individual populations of Light-bellied Brent Goose, Black-tailed Godwit and Bar-tailed Godwit that use it. Also of significance is the regular presence of several species that are listed on Annex I of the E.U. Birds Directive, notably Golden Plover and Bar-tailed Godwit, but also Ruff and Short-eared Owl. North Bull Island is a Ramsar Convention site, and part of the North Bull Island SPA is a Statutory Nature Reserve and a Wildfowl Sanctuary.”

4.1.3 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 8 below and Figure 9.

TABLE 8. QUALIFYING INTERESTS (QIs) / SPECIAL CONSERVATION INTERESTS (SCIs) AND THEIR CONSERVATION OBJECTIVES FOR THE RELEVANT EUROPEAN SITES.

QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
North Dublin Bay SAC (000206)		
Annual vegetation of drift lines [1210]	Good	To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
Embryonic shifting dunes [2110]	Excellent	
Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]	Good	
Fixed coastal dunes with <i>herbaceous vegetation</i> (grey dunes) [2130]	Excellent	
Mudflats and sandflats not covered by seawater at low tide [1140]	Good	To <u>maintain</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
<i>Salicornia</i> and other annuals colonising mud and sand [1310]	Excellent	To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330]	Good	To <u>maintain</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.
Humid dune slacks [2190]	Excellent	To <u>restore</u> the favourable conservation condition of these habitats in North Dublin Bay SAC.

QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
<i>Spartina</i> swards [1320]	N/A	Not available
Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]	Good	Not available
North Bull Island SPA (004006)		
Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]	Excellent	To maintain the favourable conservation condition of this SCI species in North Bull Island SPA (004006) .
Shelduck (<i>Tadorna tadorna</i>) [A048]	Excellent	
Teal (<i>Anas crecca</i>) [A052]	Excellent	
Pintail (<i>Anas acuta</i>) [A054]	Excellent	
Shoveler (<i>Anas clypeata</i>) [A056]	Excellent	
Oystercatcher (<i>Haematopus ostralegus</i>) [A130]	Excellent	
Golden Plover (<i>Pluvialis apricaria</i>) [A140]	Average or Reduced	
Grey Plover (<i>Pluvialis squatarola</i>) [A141]	Excellent	
Knot (<i>Calidris canutus</i>) [A143]	Excellent	
Sanderling (<i>Calidris alba</i>) [A144]	Excellent	
Dunlin (<i>Calidris alpina</i>) [A149]	Excellent	
Black-tailed Godwit (<i>Limosa limosa</i>) [A156]	Excellent	
Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]	Excellent	
Curlew (<i>Numenius arquata</i>) [A160]	Excellent	

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QI / SCI (* = priority habitat)	Conservation Status	Conservation Objective
Redshank (<i>Tringa totanus</i>) [A162]	Excellent	
Turnstone (<i>Arenaria interpres</i>) [A169]	Excellent	
Eurasian wigeon (<i>Anas Penelope</i>) [A050]	Excellent	
Common ringed plover (<i>Charadrius hiaticula</i>) [A137]	Excellent	
Petalwort (<i>Petalophyllum ralfsii</i>) [1395]	Good	
Little tern (<i>Sterna albifrons</i>) [A195]	Good	

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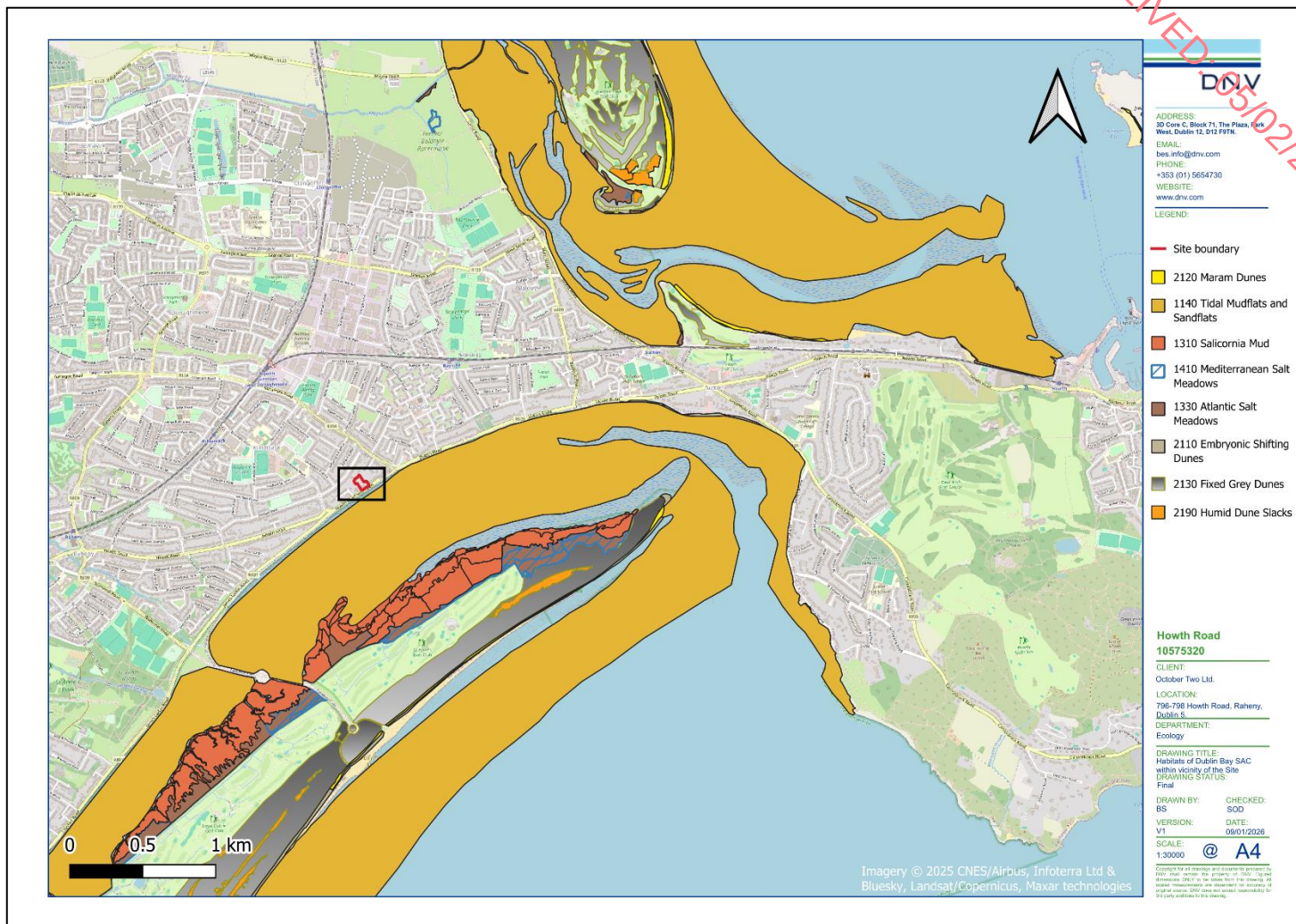


FIGURE 9. NORTH DUBLIN BAY SAC HABITATS IN VICINITY OF THE PROPOSED DEVELOPMENT.

4.2 Impact Prediction

This section follows the S-P-R method as outlined in Section 2.8 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 the **North Dublin Bay SAC (000206) and North Bull Island SPA (004006)** in light of its 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.

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

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: 18 months, beginning within 3 months of receipt of planning permission*)

- Uncontrolled releases of silt, 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.

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.
- Flightline/collision risk with bird species which may be using the area/migrating through.

The QIs/SCIs for the relevant European sites are shown on Figure 9 and described in Table 9 below. Descriptions are sourced from the relevant Conservation Objectives and supporting documents (NPWS 2013, NPWS 2015), Standard Data Forms (EEA, 2025) as well as the surveys carried out at the Site.

TABLE 9. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. QUALIFYING INTERESTS (QIs) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (EEA, 2025)⁶

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways to Receptors	Potential Effects
Special Areas of Conservation (SAC)			
North Dublin Bay SAC (000206) Linear Distance to Proposed Development: 18m south	As per SDF update 10/2020 (or NPWS, 2013) Habitats Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] <i>Spartina</i> swards [1320]	Direct hydrological, hydrogeological, and air/land pathways were identified, owing to the proximity of the Site to this European Site (18m at its closest point). Mitigation is therefore required.	Hydrological: Potential for water quality deterioration during the Construction Phase which may affect QI features of the SAC. No potential for Operational Phase effects due to embedded SuDS measure which will prevent excess surface water runoff. All foul and surface water drainage is connected to the existing network. Hydrogeological: Potential for water quality deterioration during Construction which may affect QI features of the SAC. Air/Land: <u>Potential Dust Impacts</u> Potential for dust arising from the Development to impact QI habitats of the nearby SAC displacement of species the during Construction phase.

⁶ The full species list included in this table is as per the latest updated information as indicated, so either the Conservation Objectives (CO) document for the site, or the latest Standard Data Form (SDF) (EEA, 2024). For SDF updates, CO are not yet available for the newly added species but are assumed, for the purposes of assessment, to follow the same format as for other feature species.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways to Receptors	Potential Effects
Special Protection Areas (SPAs)			
North Bull Island SPA (00406) Linear Distance to Proposed Development: 18m south	Birds (NPWS, 2015) 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] Eurasian wigeon (<i>Anas penelope</i>) [A050] Common ringed plover (<i>Charadrius hiaticula</i>) [A137] Petalwort (<i>Petalophyllum ralfsii</i>) [1395] Little tern (<i>Sterna albifrons</i>) [A195]	Direct hydrological, hydrogeological, and air/land pathways were identified, owing to the proximity of the Site to this European Site (18m at its closest point). The potential for flightline impacts on migratory/wintering bird species that are SCI species of this SPA were also identified. Mitigation is therefore required.	Hydrological: Potential for water quality deterioration during the Construction Phase affecting prey availability for SCI species. No potential for Operational Phase effects due to embedded SuDS measure which will prevent excess surface water runoff. All foul and surface water drainage is connected to the existing network. Hydrogeological: Potential for water quality deterioration during Construction affecting prey availability for SCI species. Air/Land: <u>Noise/visual disturbance</u> The 18m separation distance is within the disturbance distance for SCI species (Cutts et al, 2009). Potential for disturbance to species and displacement of species during Construction and Operation. <u>Light-related disturbance</u> Unlikely to cause significant impacts on SCI birds based on limited light spill from the Proposed Development on this habitat.

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Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways to Receptors	Potential Effects
			Ex-situ Habitat Loss: The Site does not provide suitable ex-situ habitat for SCI species of the nearby SPA.

4.3 Avoidance, Best Practice 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) (Garland, 2025c) that will be prepared prior to commencing works by the appointed construction contractor.

4.3.1 Summary of Potential Effects

Potential impacts of the Construction Phase (*Estimated duration: 18 months, beginning within 3 months of receipt of planning permission*)

- Uncontrolled releases of silt, sediments and/or other pollutants to air due to construction;
- 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 lighting in the vicinity as a result of construction activity; and
- Increased human presence and activity as a result of construction activity.

Potential impacts of the 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.
- Flightline/collision risk with bird species which may be using the area/migrating through.

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.

4.3.2 Avoidance by Design

4.3.2.1 Reduction of Collision Risk Impacts

While wintering bird surveys were not carried out on Site, indirect pathways (e.g., disruptions to migratory pathways) were considered on a precautionary basis given the proximity of the Site to **North Bull Island SPA (004006)**.

The risk of collision impacts occurring with SCI species of the nearby SPA were considered in the AA Screening Report for this Development and ruled out.

The key design features embedded in the Project Proposal, which also provide appropriate mitigations for collision risk, are provided below.

Building Appearance

Whilst the design of the facades of the buildings do include windows, as shown on the elevation drawings prepared by NDBA for the proposed development no large continuous surfaces of glass are proposed. Rather the overall façades of the proposed buildings are well broken up, with a varied material composition

interspersing any reflective areas. These architectural design features provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. This overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is negligible. These architectural design features are part of the overall design of the Proposed Development and are not considered to represent specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard. It is noted that birds are not deemed to be at any particular risk of collisions with the proposed buildings at the Site.

As such, based on the heights (4-5 storeys) of the proposed structures, their physical appearance and the nature of their location, it is deemed that birds including any 'at-risk' species, do not have the potential to be impacted by the Proposed Development in terms of collisions and the risk is therefore deemed to be **imperceptible** in the absence of any mitigation.

Building Height

With respect to Special Conservation Interest (SCI) species for SPAs within the zone of influence of the Proposed Development which regularly use or travel over inland areas (i.e. light bellied brent goose, gull species, duck species and a number of waders such as oystercatcher, godwit species or curlew), in Dublin they navigate the urban environment with built structures daily.

To put some context on some of their avoidance capabilities, in a different setting and for use in collision risk modelling for onshore wind turbines, an avoidance rate of 99.5% is applied for large gull species and an avoidance rate of 99.2% is applied for small gull species (Furness, 2019), which essentially means that 99.5% and 99.2% of gull flights, respectively, will avoid collision with a moving turbine. For Curlew the avoidance rate applied is 98% (SNH, 2018).

The risk of collision is even less with a static, clearly detectable building. The proposed buildings consist of glazing, broken up with a varied material composition interspersing any reflective areas. While the presence of the Proposed Development might alter flight patterns of bird species slightly to avoid the proposed building structures the risk of collision is extremely low.

The Proposed Development entails the construction of relatively low level residential buildings ranging in height from 4-5 storeys in height over basement level, and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be negligible (migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020).

It is considered that birds that fly over the Site to commute between feeding grounds at various locations would fly lower than this, however, once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds would simply fly around or over them.

As such, flightline/collision risk impacts on SCI species of the nearby SPA are not expected to occur.

4.3.2.2 Surface Water Management Approach

Surface water discharge rates from the proposed surface water drainage network will be controlled by the below proposed SuDS measures, which have the capacity to provide attenuation on the surface water run-off rates from the Site, thereby reducing run-off rates from surface water on Site during its Operational Phase, and further mitigating the risk of surface water overflow during excessive rainfall/flooding events:

- Extensive Green/ Blue roofs
- Permeable pavement
- Bioretention swales
- Flood storage tank
- Bypass interceptor

It should also be noted that Surface water at the Proposed Development will discharge into the existing public stormwater network.

4.3.2.3 Foul Drainage

The Proposed Development will be connected to the foul sewer network that is already laid within the existing 600Ø IW foul main on Howth Road adjacent to the Site.

All foul water is directed to the Ringsend WWTP where it will be treated to appropriate levels prior to discharge.

4.3.3 Construction Phase

4.3.3.1 Mitigation 1: Water Quality Protection

The following applies to all stages of the Construction Phase for the Proposed Development unless specific measures have been identified. As it has been identified that the Proposed Development could potentially affect SCI/QI species associated with the **North Dublin Bay SAC (000210)** and **North Bull Island SPA (004006)** during the Construction Phase as a result of water quality impacts, the mitigation measures listed in the following sections will be undertaken.

Construction Phase Best Practice

The following measures, designed to protect surface water quality, will serve to prevent any negative effects occurring in the **North Dublin Bay SAC (000210)** and **North Bull Island SPA (004006)** as a result of Construction Phase surface and groundwater discharges from the Site. These mitigation measures will treat the source (e.g., refuelling of plant to be carried out at designated refuelling station locations on Site) or remove the pathway (e.g., no release of wastewater generated on-Site into nearby drains or to ground during the Construction Phase).

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.

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.

In addition, standard best practice measures will be implemented throughout the Construction Phase to ensure no construction-related pollutants are discharged into the surface water or groundwater at and surrounding the Site, that could subsequently be transferred by same to the SAC. The below presents the standard best practice measures that will be implemented on Site during the Construction Phase of the Proposed Development:

- Any drains or sewers which could act as pathways for contamination from the Site will be blocked where required.

- Location of any stilling/settling ponds will take into account groundwater vulnerability at the site and will be located in suitable areas.
- Discharge water generated during placement of concrete will be stored and removed off Site for treatment and disposal.
- There will be no washing out of any concrete trucks on Site. Any washing of chutes will be carefully collected in a designated container which will be subsequently sent off site for compliant waste management.
- 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.
- 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 included within the Contractor's CEMP and the details of which will be communicated, resourced and 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 on Site 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 surface water inflow into the main areas of excavation will be minimised where possible.

Sedimentation/Siltation Measures

It is proposed to provide a petrol interceptor downstream of the site and the attenuation tank to ensure that any remaining hydro-carbons or pollutants within the runoff from trafficked areas are treated prior to outfall.

Maintenance of Plant and Machinery

- All plant and equipment will be regularly cleaned and properly maintained.
- There will be no washing out of any concrete trucks on Site.
- Pumped concrete will be monitored to ensure there is no accidental discharge and will be carried out in dry weather and with impermeable pouring mats laid down where possible.

Building/Road Network and Services

- Constructing buildings and roads above flood level to ensure that backflows through the surface water outfalls will not occur.
- Any impermeable road surface will be finished with tarmac or asphalt surface which will discharge runoff to a piped drainage system, and surface water drains will be installed in roads and streets and in pre-determined wayleaves adjacent to building structures.
- All car parking and refuel areas at the Site will be located on substrate underlain with an impermeable liner to prevent contaminant leaching to groundwater.

Earthworks Mitigation

The proposed earthworks mitigation measures for both the construction and operational phases include:

- Mud spillages on roads and footpaths outside the site will be cleaned regularly and not be allowed to accumulate. A street sweeper will attend Site regularly to clean the road when there are truck movements in and out of the site.

- Hard surface roads will be regularly swept to remove mud and aggregate materials from their surface;
- Public roads outside the Site will be regularly inspected for cleanliness, and cleaned using a road sweeper or handheld dust vacuums as necessary;
- Material handling systems and Site stockpiling of materials will be designed and laid out to minimise exposure to wind; and
- Water misting or sprays will be used on stockpiles as required if particularly dusty activities are necessary during dry or windy periods.

Storage and Use of Fuels, Oils, and Chemicals

- Appropriate bunding, storage and signage arrangements for all deleterious substances (e.g., fuels, oils, and chemicals) will be used.
- Fuels, lubricants, and hydraulic fluids for equipment used on the construction Site will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice (Enterprise Ireland BPGCS005).
- Waste oils and hydraulic fluids will be collected in appropriate receptacles, stored in designated areas and removed from the Site for disposal or recycling.
- Diesel tanks, used to store fuel for the various items of machinery, will be self-contained and double-walled.
- Spillage and leaks of oil from cars parked in the development during the Construction Phase are unavoidable. To reduce the potential impacts, oil interceptors will be incorporated into the Site drainage design.
- Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the Site and properly disposed of.
- Where onsite fuelling facilities are used there will be a bunded filling area with a double bunded steel tank at a minimum.
- Plant will not be left running when not in use (i.e., no idling) and plant with dust arrestment equipment will be used where practical.

Spill/Emergency Response Plans

Robust and appropriate Spill Response Plan and Site Environmental Emergency Plans (SEP) will be implemented for the duration of the works:

- Identifying fuel storage and refuelling locations on designated areas within the compound, away from drainage ditches/waterbodies, and on substrate underlain with an impermeable liner to prevent contaminant leaching to groundwater;
- Identifying spill kit locations (spill kits will be required for each piece of heavy equipment (e.g., excavators, loaders, trucks, etc.,) which will be at least 21L drum size each with spill pads, sorbent, small boom, plastic garbage bag and gloves;
- A specially trained and dedicated Environmental and Emergency Spill Response team will be appointed before the commencement of works on Site.
- Staff will be trained and experienced in using appropriate control measures and spill kits on-Site, and will be familiar with the location of all spill kit locations and the Site layout
- A register will be kept of all hazardous substances either used on Site 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;
- Personal Protective Equipment (PPE) is required when using the material.

Waste Management and Disposal

Waste management and disposal will comprise the following:

- 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.
- In the event of any fugitive solid waste escaping the site, it will be collected immediately and removed to storage on-site and subsequently disposed of in the appropriate manner.

- Portaloos and/or containerised toilets and welfare units will be used to provide facilities for Site personnel. All associated waste will be removed from the Proposed Development Site by a licenced waste disposal contractor.
- Mixer washings are not to be discharged into ground or drainage ditches and will be collected and disposed of at a suitably licenced facility.

4.3.3.2 In addition, a minimal waste approach of reduction, reuse and recycling will be utilized where practicable/appropriate. Where this cannot be carried out, all wastes will be disposed of at licenced waste facilities.

Mitigation 2: Reduction of Dust Related Impacts

The following general dust control measures will be followed for the duration of the Construction Phase of the Proposed Development and will ensure no significant dust-related impacts occur to nearby sensitive receptors.

- In situations where the source of dust is within 25m of sensitive receptors screens (permeable or semi-permeable) will be erected.
- Haulage vehicles transporting gravel and other similar materials to the Site will be covered by a tarpaulin or similar.
- Access and exit of vehicles will be restricted to certain access/exit points.
- Vehicle speed restrictions of 20km/hr will be in place.
- Bowsers will be available during periods of dry weather throughout the Construction period.
- During dry and windy periods, and when there is a likelihood of dust nuisance, a bower will operate to ensure moisture content is high enough to increase the stability of the soil thereby reducing the amount of dust.
- Stockpiling of imported materials will be avoided where possible with imported materials ideally placed on Site in their proposed location upon receipt with double handling avoided.
- Stockpiles will be stored in sheltered areas of the Site, covered, and watered regularly or as needed if exposed during dry weather.
- Gravel should be used at Site exit points to remove caked-on dirt from tyre tracks.
- Hard-surfaced roads will be wet-swept to remove any deposited materials and any unsurfaced areas will be restricted to essential traffic only.
- If required to control dust nuisance wheel-washing facilities will be located at the exit from the construction site.
- Dust production as a result of Site activity will be minimised by regular cleaning of the Site access roads using vacuum road sweepers and washers.
- The frequency of cleaning will be determined by the Site agent and is weather and activity dependent.
- The height of stockpiles will be kept to a minimum and slopes should be gentle to avoid windblown soil dust.
- The following will be dampened during dry weather:
 - Unpaved areas subject to traffic and wind.
 - Stockpiles.
 - Areas where there will be loading and unloading of dust-generating materials.
- Under no circumstances will wastewater from equipment, wheel or surface cleaning enter the local drainage network.

4.3.3.3 Mitigation 3: Noise Reduction Measures

Noise generated during the Construction Phase of the Proposed Development could cause temporary disturbance to receptors which may be utilising the **North Dublin Bay SAC (000210)** and **North Bull Island SPA (004006)** adjacent to the Site of the Proposed Development. To mitigate this disturbance, the following measures will be implemented:

- Selection of plant with low inherent potential for generating noise.
- Siting of plant as far away from sensitive receptors as permitted by Site constraints.
- Avoidance of unnecessary revving of engines and switch off plant items when not required.
- Keep plant machinery and vehicles adequately maintained and serviced.
- Proper balancing of plant items with rotating parts.
- Keep internal routes well-maintained and avoid steep gradients.
- Minimise drop heights for materials or ensure a resilient material underlies.
- Where noise originates from resonating body panels and cover plates, additional stiffening ribs or materials should be safely applied where appropriate.
- Limiting the hours during which Site activities likely to create high levels of noise are permitted.
- Appointing a Site representative responsible for matters relating to noise.
- Monitoring typical levels of noise during critical periods and at sensitive locations.

These measures will ensure that any noise disturbance to nearby SCI bird species or any other fauna species in the vicinity of the Site of the Proposed Development will be reduced to a minimum.

In addition, it is noted that the Construction Phase of the Proposed Development is expected to take just 18 months to complete, with the demolitions of the existing buildings on Site to take place outside of the wintering bird season, so as to further reduce the potential noise impacts arising from the Proposed Development, on nearby SCI bird species.

4.3.3.4 Mitigation 4: Construction Phase Lighting Mitigation Measures

Where possible, Construction Phase lighting will be switched off during non-working hours. However, during use, directional lighting will be the lighting of choice as this will minimise light spill from the site, into any surrounding areas which may be utilised by any animals that may be commuting/foraging in the area.

It is recommended that LED luminaires possessing a warm white spectrum (2700k – 3000k) be used so as to reduce the blue light component. LED lights are also ideal due to their sharp cut-off, lower intensity, and dimming capabilities.

4.3.3.5 Mitigation 5: Hours of Operation during Construction Phase

The Construction Phase is expected to last 18 months with the demolition phase occurring outside of the winter period.

For the duration of the Construction Phase, it is envisaged that the maximum working hours shall be 07:00 to 19:00 Monday to Friday and 08:00 to 14:00 Saturdays, and not at all on Sundays.

On occasion, it may be necessary to carry out noisy activities outside of normal working hours. In such instances, prior consultation will be carried out with Dublin City Council and local residents outlining the nature and reason for the works and their expected duration.

4.3.4 Operational Phase

4.3.4.1 Mitigation 6: Operational Phase Lighting

In order to minimise disturbance to birds that may be utilising the site or immediate surrounds in general (i.e. North Dublin Bay), the lighting and layout of the Proposed Development will be designed to minimise light-spill onto habitats used by these species. This can be achieved by ensuring that the design of lighting accords with guidelines presented in the Bat Conservation Trust & Institute of Lighting Engineers *'Bats and Lighting in the UK - Bats and Built Environment Series'*, the Bat Conservation Trust *'Artificial Lighting and Wildlife Interim Guidance'* and the Bat Conservation Trust *'Statement on the impact and design of artificial light on bats'*. Therefore, where possible, the lighting scheme will include the following:

- Lighting will only be installed where necessary for public safety adjacent to Dublin Bay. These lights have been designed and selected with specific shutters and filters to minimise any potential for back spills into the sensitive locations while still providing the primary function of safely lighting the pedestrian routes.
- Lighting along the front of the development (i.e. along Howth Road) will be avoided where possible and wildlife friendly; using low level bollards, motion sensors where applicable, once health and safety standards are met.
- Lighting controls and dimming shall be utilised for post-curfew times.
- Shielding of Luminaires & Light - To minimize disturbance, the design avoids the use of upward lighting by shielding or by downward directional focus. i.e., no upward tilt.

In addition, the lighting associated with the Proposed Development is expected to be consistent with existing lighting conditions of the surrounding area, specifically the existing street lighting along Howth Road, which is heavily urbanised in nature, and, as such SCI species which may be present would be expected to be habituated to such urbanised light.

4.4 Monitoring

4.4.1 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 by the site contractor to ensure they remain effective, and more often during moderate to heavy rainfall events as appropriate.
- Dust control measures (Mitigation 2) will be checked on a weekly basis by the site contractor, and more often during dry weather, to ensure they remain effective. Dublin Bay which lies immediately adjacent to the Proposed Development will be checked for any potential dust impacts, and the dust control measures reviewed if impacts are noted.
- Noise control and monitoring will take place to ensure levels are within the recommendations given in BS 5228 and the noise levels quoted in the relevant European Commission Directive 2000/14/EC.

4.4.2 Operational Phase

The requirement for Operational Phase monitoring is not envisaged.

4.5 Residual Impacts

Using the precautionary principle, it is considered that in the absence of suitable mitigation, the Proposed Development has the potential to cause significant adverse effects on **North Dublin Bay SAC (000210)** and **North Bull Island SPA (004006)**; through construction related surface water contamination, leading to a reduction in water quality at this European site, as well as through increased lighting, noise and dust

related impacts arising from the Construction Phase. In the absence of mitigation, Operational Phase lighting could also pose a risk to SCI species of the nearby North Bull Island SPA.

As a result, a set of mitigation measures have been proposed in **Section 4.3** above to address the risks posed by the construction of the Proposed Development on both the **North Dublin Bay SAC (000210)** and **North Bull Island SPA (004006)**.

Once these measures are employed in full it is envisaged that there will not be any residual impacts associated with the Proposed Development that could adversely affect the integrity of the that SAC/SPA, or any other European Site.

4.6 Stage 2: Natura Impact Statement – Conclusion

This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed Residential Development planning application at 794, 796 and 798 Howth Road, Raheny, Dublin 5, 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 Appropriate Assessment 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 Sites, 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 sites, individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys has 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 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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