

Proposed Strategic Housing Development on  
the former Player Wills Site and undeveloped  
land owned by Dublin City Council at South  
Circular Road, Dublin 8  
Appropriate Assessment Screening Report

Environmental  
Assessment  
**Built  
Environment**

Client:

CWTC Multi Family ICAV

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# 1 Introduction and background

## 1.1 Introduction and background

CWTC Multi Family ICAV is seeking permission for a proposed strategic housing development at the 'Player Wills' site, South Circular Road, Dublin 8. The proposed development is described in Section 4 of this report.

Brady Shipman Martin was appointed by the applicant to prepare a report to assist An Bord Pleanála in undertaking a screening exercise for Appropriate Assessment (AA). The purpose of the screening exercise is to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with other plans or projects is likely to have a significant effect on European sites taking into account their conservation objectives.

This document constitutes the Appropriate Assessment Screening Report prepared for this purpose.

A comprehensive desk study review and a number of site visits were undertaken and the potential impacts on European sites, both as a result of the proposed development and in-combination with other plans and projects, are appraised in this report.

## 1.2 Legal requirement for Appropriate Assessment

European sites are also known as Natura 2000 Sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA). These are a network of sites designated for nature conservation under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the "Birds Directive"). The requirements for Appropriate Assessment are set out under *Article 6 of the Habitats Directive*, transposed into Irish law by the *European Union (Birds and Natural Habitats) Regulations 2011-2015*<sup>1</sup> (the "Birds and Natural Habitats Regulations") and the *Planning and Development Act, 2000 - 2018* (the "Planning Acts").

Article 6(3) of the Habitats Directive states that:

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

The first test is to establish whether, in relation to a particular plan or project, appropriate assessment is required. Sections 177U of the Planning Acts and Regulation 42 of the Birds and Natural Habitats Regulations require that the AA screening test must be applied to the proposed development, as follows:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site;

An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

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<sup>1</sup> SI No. 477 of 2011

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This AA Screening Report has been prepared in accordance with the requirements of the Birds Directive, the Habitats Directive, the Planning Acts and the Birds and Natural Habitats Regulations.

## 2 Methodology

### 2.1 Baseline data collection and field visits

A desk-based assessment was undertaken between September and December 2020 of the Player Wills site and the wider area. This focused on habitats and species that are listed as Qualifying Interests (QI) (in the case of SACs) and Special Conservation Interests (SCI) (in the case of SPAs) in the designations for European sites. Ecological surveys were first undertaken at the site, including habitat, invasive species, mammal and day-time bat surveys, by the author on 5<sup>th</sup> and 21<sup>st</sup> May 2019. In addition, dusk and dawn bat surveys were undertaken at the site on 19<sup>th</sup>/20<sup>th</sup> August 2019 and on 3<sup>rd</sup>/4<sup>th</sup> September 2020, by specialist bat ecologist Mr Brian Keeley MCIEEM.

Additional site surveys were undertaken by the author on 11<sup>th</sup> February, 4<sup>th</sup> March and 29<sup>th</sup> September 2020.

Birds present on the site were recorded during the surveys and an assessment of habitat suitability for species with links to European sites was undertaken, in order to appraise the potential for ex-situ effects on European sites.

This report takes the following guidance documents into account:

- *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 NPWS 1/10 & PSSP 2/10;
- *Assessment of Plans and Projects Significantly Affecting European sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission Environment Directorate-General, 2001);
- *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*. Guidance issued by the European Commission (21<sup>st</sup> November 2018).

Information was collated from the organisations and websites listed below:

- Data on European sites and rare and protected plant and animal species contained in the following databases:
  - The National Parks and Wildlife Service (NPWS) of the Department of Culture, Heritage and the Gaeltacht ([www.NPWS.ie](http://www.NPWS.ie));
  - The National Biodiversity Data Centre (NDBC) ([www.biodiversityireland.ie](http://www.biodiversityireland.ie));
  - BirdWatch Ireland ([www.birdwatchireland.ie](http://www.birdwatchireland.ie));
  - Bat Conservation Ireland ([www.batconservationireland.org](http://www.batconservationireland.org)).
- Information on land-use zoning from the online mapping of the Department of the Environment, Community and Local Government (<http://www.myplan.ie/en/index.html>);
- Recent and historical OSi mapping and aerial photography, including [www.geohive.ie](http://www.geohive.ie);
- Photographs taken at the site in 2019 and 2020;
- Information on local watercourses from [www.catchments.ie](http://www.catchments.ie);
- Information on water quality in the area ([www.epa.ie](http://www.epa.ie));

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- Information on soils, geology and hydrogeology in the area ([www.gsi.ie](http://www.gsi.ie));
- Information on the Status of EU Protected Habitats and Species in Ireland (Article 17 report) (NPWS, August 2019);
- Third National Biodiversity Plan 2017 – 2021 (Department of Culture, Heritage and the Gaeltacht, 2017);
- Dublin City Development Plan 2016 – 2022, including the accompanying Appropriate Assessment documentation (Natura Impact Report).

The report has regard to the following legislative instruments:

- Planning Acts;
- European Commission (EC) Habitats Directive 92/43/EEC;
- European Commission (EC) Birds Directive 2009/147/EC;
- Birds and Natural Habitats Regulations.

The report takes full account of the design of the proposed development and a detailed examination of all relevant elements of the proposed development was undertaken. This includes the following documents, among others submitted with the pre-application documentation:

- Proposed Development at Player Wills – Environmental Impact Assessment Report (MH Planning, December 2020);
- Proposed Development at Player Wills – Civil Engineering and Infrastructure Report for Planning (Barrett Mahony Consulting Engineers (BMCE), December 2020);
- Proposed Development at Player Wills – Construction Environmental Management Plan (Garland Consulting Engineers, December 2020);
- Proposed Development at Player Wills – Construction & Demolition Waste Management Plan (Barrett Mahony Consulting Engineers, December 2020);
- Masterplan for Player Wills, Dublin City Council and Bailey Gibson Lands (SDRA 12) (HJL, January 2020).

Given the amount of information available, including from the developer, NPWS and other sources, it has been possible to gather adequate information on the site and the adjacent area (in particular, the European sites), in order to make an informed, sound judgement as to the potential impacts of the proposed development on the qualifying interests of the European sites.

## 2.2 Expertise and Qualifications

A comprehensive desk study review and a number of site visits were undertaken and the potential impacts on European sites, both as a result of the proposed development and in-combination with other plans and projects, are appraised in this report.

The work was carried out by Senior Ecologist Matthew Hague BSc MSc Adv. Dip. Plan. & Env. Law CEnv MCIEEM. Matthew is a highly experienced and qualified ecologist, with a master's degree in Ecosystem Conservation and Landscape Management. He has over 18 years of experience in ecological and environmental consultancy, across a wide range of sectors. He has prepared numerous reports for AA Screening as well as Natura Impact Statements, for projects of all scales, from small residential developments to nationally important infrastructure projects.

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Matthew is a Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Matthew has also completed an Advanced Diploma in Planning and Environmental Law, at King's Inns and is a member of the Irish Environmental Law Association (IELA).

## 3 Screening for Appropriate Assessment

### 3.1 Background

The first part of the Appropriate Assessment process is the Screening phase. Screening identifies the likely effects of the proposed development on European sites that could arise, either alone or in combination with other plans or projects, and considers whether these impacts are likely to have a significant effect on the European site in view of the site's conservation objectives.

In accordance with sections 177U and 177V of the Planning Acts, the AA screening test must be applied to the proposed development, as follows:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site;
- An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

The test is a 'possibility' of effects rather than a 'certainty' of effects. The test of significance is whether a plan or project could undermine the site's conservation objectives. Furthermore, screening must be undertaken without the inclusion of mitigation and it is in this context that this AA Screening Report is prepared.

Following Screening therefore, if there is a possibility of there being a significant effect on a European site, this will generate the need for an appropriate assessment for the purposes of Article 6(3) of the Habitats Directive. This means that if the conclusions at the end of the screening exercise are that significant effects on any European sites, as a result of the proposed development, either alone or in combination with other plans and projects, are likely, uncertain or unknown, then an Appropriate Assessment must be carried out. This is in accordance with established precedent and case law.

### 3.2 Potential zone of influence

For the risk of a significant effect to occur there must be a 'source', such as a construction site; a 'receptor', such as a designated site for nature conservation; and a pathway between the source and the receptor, such as a watercourse that links the construction site to the designated site. Although there may be a risk of an impact it may not necessarily occur, and if it does occur, it may not be significant.

Identification of a potential effect means that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the potential effect and the characteristics of the receptor.

There are no set recommended distances for projects to consider European sites as being relevant for assessment. Rather, NPWS (2010) recommends that *'the distance should be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects'*. It is often considered appropriate to include all European sites within 15km.

However, in some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 km away. Taking this into account, as a starting point a search was carried out for all European sites

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within 15km of the Player Wills site. This search was then extended in order to ensure that all European sites with any potential links/pathways to the proposed development were accounted for in the study.

## 3.3 Study area and surrounding environment

### 3.3.1 Site location and European sites

The proposed development site at Player Wills is (see **Figure 1a and 1b**) bounded to the south by South Circular Road and to the east by existing residential development and St. Catherine's School. St Theresa's Church lies immediately to the north. To the west (and outside of the proposed development area) is a large area of open, undeveloped land, dominated by rank grassland and bramble/buddleia dominated encroaching scrub (the 'Boys Brigade' land). To the west of this undeveloped land, which is in the ownership of Dublin City Council, is an area known as the 'Bailey Gibson' site, which is the subject of a separate SHD application (ABP Reg. Ref. 307221).

The Player Wills site is almost entirely occupied by buildings and artificial surfaces. With the exception of small patches of ruderal plants, some isolated pockets of scrub and small trees and an area of bramble scrub and some isolated trees along the northern boundary (adjoining St. Theresa's Church), there are no vegetated habitats of any description on the site.

Although there are numerous buildings on the site, including the old Players factory itself, the bat surveys undertaken recorded no evidence of any use of the site by roosting bats. Similarly, there is no evidence of nesting birds with the exception of feral pigeons on the site.

There are no watercourses present on or in the immediate vicinity of the site<sup>2</sup>. The nearest such feature, the Grand Canal, is approximately 100m to the south at its closest point. The River Poddle is approximately 700m to the east, however the Poddle is culverted for much of its length in the city centre and there is no connection between the proposed development site and this watercourse. The proposed development site is located within the River Liffey and Dublin Bay catchment (in the Dodder sub-catchment and the Poddle sub-basin).

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<sup>2</sup> <https://gis.epa.ie/EPAMaps/>





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**Figure 1b:** Location of proposed Player Wills development site, with DCC Lands and the Player Wills Masterplan Area also shown (Red line is indicative, refer to accompanying documentation for full details).

There are 14 European sites located within a 15km radius of the proposed development (see **Figure 2**). These are:

- **Special Areas of Conservation (SAC)**
  - South Dublin Bay SAC (site code 000210), c.4.7km to the east;
  - North Dublin Bay SAC (site code 000206), c.7.5km to the north east;
  - Glensmole Valley SAC (site code 001209), c.10.0km to the south west;
  - Wicklow Mountains SAC (site code 002122), c.10.5km to the south;
  - Baldoye Bay SAC (site code 000199), c.12.5km to the north east;
  - Rockabill to Dalkey Island SAC (site code 003000), c.13.0km to the east;
  - Howth Head SAC (site code 000202), c.13.1km to the north east;
  - Rye Water Valley/Carton SAC (site code 001398), c.14.0km to the west;
  - Knocksink Wood SAC (site code 000725), c.14.3km to the south;

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- **Special Protection Areas (SPA)**

- South Dublin Bay and River Tolka Estuary SPA (site code 004024), c.4.7km to the east;
- North Bull Island SPA (site code 004006), c.7.5km to the north east;
- Wicklow Mountains SPA (site code 004040), c. 10.6km to the south;
- Baldoyle Bay SPA (site code 004016 ), c.12.7km to the north east;
- Dalkey Islands SPA (site code 004172), c.14.0km to the south east;

Beyond the 15km zone, there are a number of additional European sites:

- Malahide Estuary SAC (site code 000205), c.15.2km to the north;
- Ballyman Glen SAC (site code 000713), c.16.0km to the south east;
- Ireland's Eye SAC (site code 002193), c.16.4km to the north east;
- Rogerstown Estuary SAC (site codes 000208), c.19.3km to the north;
- Bray Head SAC (site code 000714), c.20.0 km to the south east;
- Red Bog, Kildare SAC (site code 000397), c.22.4km to the south west;
- Glen of the Downs SAC (site code 000719), c.23.7km to the south;
- Lambay Island SAC (site code 000204), c.23.9km to the north east;
- Broadmeadow/Swords Estuary (Malahide Estuary) SPA (site code 004025), c.15.2km to the north.
- Howth Head Coast SPA (site code 004113), c.15.7km to the north east;
- Ireland's Eye SPA (site code 004117), c.16.2km to the north east;
- Rogerstown Estuary SPA (site codes 004015), c.19.6km to the north;
- Poulaphouca Reservoir SPA (site code 004063), c.21.5km to the south west;
- Lambay Island SPA (site code 004069), c.23.7km to the north east.

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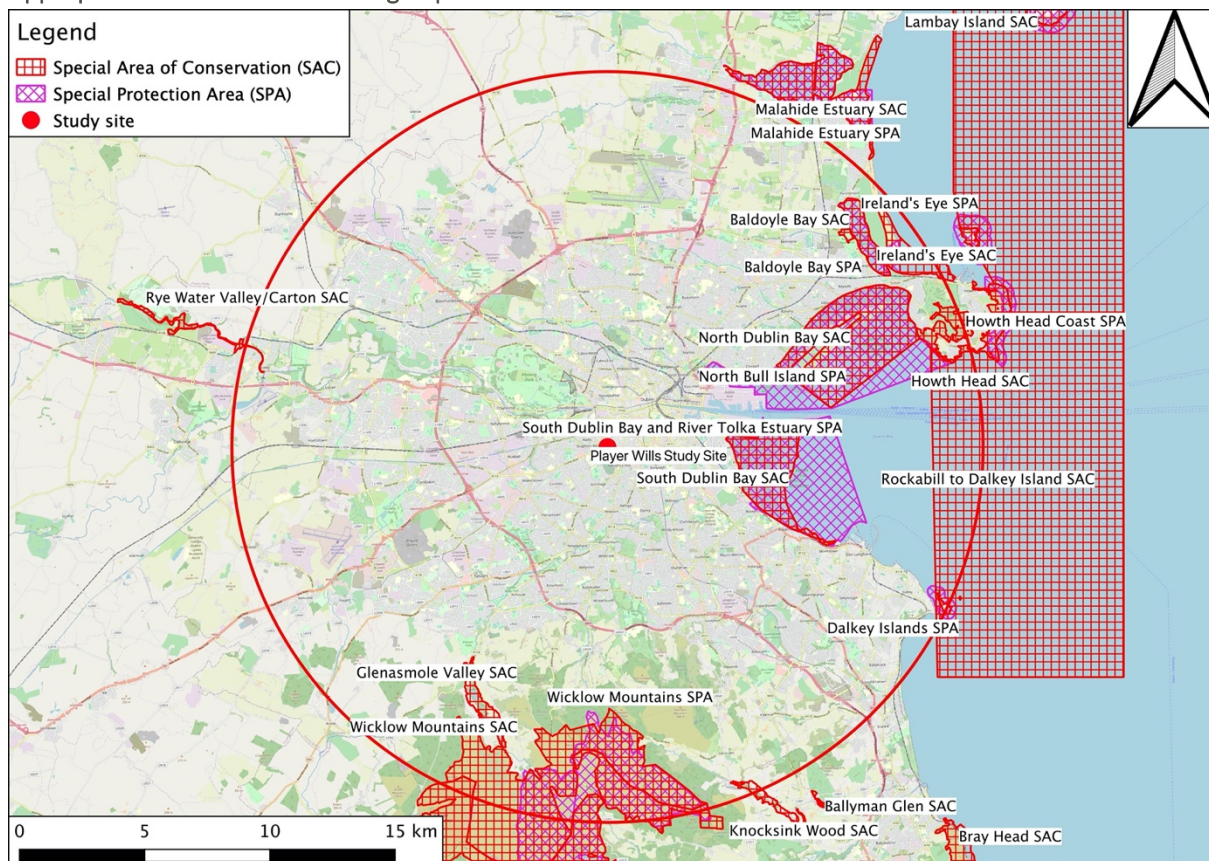


Figure 2: Proposed Player Wills development site showing European sites

### 3.3.2 Other designated areas (other than European sites)

The nearest site designated for nature conservation, not otherwise designated as a European site, is the Grand Canal proposed Natural Heritage Area (pNHA site code 002104). At its closest point the pNHA is c.100m from the Player Wills site.

Proposed Natural Heritage Areas are included in this report in order to address their potential to act as supporting sites for the European sites.

## 4 Description of the proposed development

The design rationale is to create and deliver a high quality sustainable residential development within this strategic infill site which respects its setting and maximises the site's natural attributes while achieving maximum efficiency of existing infrastructure.

The development will consist of:

- i. the demolition of all buildings (15,454 sq.m GFA), excluding the original fabric of the former Player Wills Factory, to provide for the development of a mixed use (residential, community, arts and culture, creche, food and beverage and retail) scheme comprising predominantly build to rent apartment dwellings (492 no.) together with a significantly lesser quantity of single occupancy shared accommodation private living areas (240 no.), with an average private living floor area of 24.6 sq.m (double the minimum private living space size required for single occupancy shared accommodation) and a arts/culture/community hub within the repurposed ground floor of the former factory building;

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- ii. change of use, refurbishment, modifications and alterations to the former Player Wills Factory building (PW1) to include the removal of 1 no. later addition storey (existing 4th storey) and the later addition rear (northern) extension, retention and modification of 3 no. existing storeys and addition of 2 no. storeys set back on the building's south, east and west elevations with an 8-storey projection (max. height 32.53m) on the north eastern corner, with a cumulative gross floor area of 17,630 sq.m including ancillary uses, comprising;
  - a) at ground floor 852 sq.m of floor space dedicated to community, arts and cultural and exhibition space together with artist and photography studios (Class 1 and Class 10 Use), 503 sq.m of retail floor space (Class 1 Use), 994 sq.m of café/bar/restaurant floor space, 217 sq.m of co-working office floor space (Class 3 Use) and ancillary floor space for welfare facilities, waste management and storage;
  - b) 240 no. single occupancy shared accommodation private living areas, distributed over levels 1-4, including 2 no. rooms of 30 sq.m, 49 no. rooms of 25 sq.m; 14 no. rooms of 23 sq.m, 58 no. rooms of 22.5 sq.m, 8 no. rooms of 20 sq.m, 104 no. rooms of 19 sq.m and 5 no. disabled access (Part M) rooms (3 no. 32 sq.m and 2 no. 26 sq.m); 21 no. kitchen/dining areas, and, 835 sq.m of dedicated shared accommodation services, amenities and facilities distributed across levels 1-4, to accommodate uses including lounge areas, entertainment (games) area, 2 no. external terraces (Level 03 and 04), laundry facilities, welfare facilities and waste storage;
  - c) 47 no. build-to rent apartments distributed across levels 1-7 including 12 no. studio apartments; 23 no. 1 bed apartments, 8 no. 2 bed apartments: and, 4 no. 3-bed apartments;
  - d) 1,588 sq.m of shared (build to rent and shared accommodation) services, amenities and facilities including at ground floor reception/lobby area, parcel room, 2 no. lounges and administration facilities; at Level 01 entertainment area, TV rooms, entertainment (games room), library, meeting room, business centre; at Level 02 gym and storage and at Level 07, a lounge area.
  - e) Provision of communal amenity outdoor space as follows; PW1 - 450 sq.m in the form of roof terraces dedicated to shared accommodation and 285 sq.m roof terrace for the proposed apartments .
  - f) a basement (190 sq.m) underlying the proposed 8-storey projection to the northeast of PW1 to accommodate plant.
- iii. the construction of 445 no. Build to Rent apartment units, with a cumulative gross floor area of 48,455 sq.m including ancillary uses distributed across 3 no. blocks (PW 2, 4 and 5) comprising;
  - a) PW2 (45,556 sq.m gross floor area including ancillary uses) - 415 no. apartments in a block ranging in height from 2-19 storeys (max. height 63.05m), incorporating 16 no. studio units; 268 no. 1 bed apartments, 93 no. 2 bed apartments and 38 no. 3-bed apartments. At ground floor, 2 no. retail units (combined 198 sq.m) (Class 1 use), and a café/restaurant (142 sq.m). Tenant services, amenities and facilities (combined 673 sq.m) distributed across ground floor (lobby, mail room, co-working and lounge area), Level 06 (terrace access) and Level 17 (lounge). Provision of communal amenity open space including a courtyard of 1,123 sq.m and roof terraces of 1,535 sq.m
  - b) Double basement to accommodate car parking, cycle parking, waste storage, general storage and plant.
  - c) PW4 (1,395 sq.m gross floor area including ancillary uses) - 9 no. apartments in a part 2-3 storey block (max. height 10.125m) comprising, 2 no. 2-bed duplex apartment units and 7 no. 3-bed

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triplex apartment units. Provision of communal amenity open space in the form of a courtyard 111 sq.m

- d) PW5 (1,504 sq.m gross floor area including ancillary uses) - 21 no. apartments in a 4 storey block (max. height 13.30m) comprising 12 no. studio apartments, 1 no. 1-bed apartment, 5 no. 2-bed apartments, and 3 no. 3-bed apartments. Provision of communal amenity space in the form of a courtyard 167sq.m.
- iv. the construction of a childcare facility (block PW4) with a gross floor area of 275 sq.m and associated external play area of 146 sq.m;
- v. the provision of public open space with 2 no. permanent parks, 'Players Park' (3,960 sq.m) incorporating active and passive uses to the northwest of the former factory building on lands owned by Dublin City Council; 'St. Catherine's Park' (1,350 sq.m) a playground, to the north east of the Player Wills site adjacent to St. Catherine's National School. A temporary public park (1,158 sq.m) to the northeast of the site set aside for a future school extension. The existing courtyard (690 sq.m) in block PW1 (former factory building) to be retained and enhanced and a public plaza (320 sq.m) between proposed blocks PW and PW4.
- vi. 903 no. long-stay bicycle parking spaces, with 861 no. spaces in the PW2 basement and 42 no. spaces at ground level in secure enclosures within blocks PW4 and PW5. 20 no. spaces reserved for non-residential uses and 110 no. short-stay visitor bicycle spaces provided at ground level.
- vii. 4 no. dedicated pedestrian access points are proposed to maximise walking and cycling, 2 no. from South Circular Road, 1 no. from St. Catherine's Avenue and 1 no. from Donore Avenue.
- viii. in the basement of PW2, 148 no. car parking spaces to serve the proposed build to rent apartments including 19 no. dedicated disabled parking spaces and 6 no. motorcycle spaces. 20 no. spaces for a car sharing club ('Go Car' or similar). 10% of parking spaces fitted with electric charging points.
- ix. in the basement of PW2, use for 81 no. car parking spaces (1,293 sq.m net floor area) including 5 no. dedicated disabled parking spaces, 3 no. motorcycle spaces and 10% of parking spaces fitted with electric charging points to facilitate residential car parking associated with future development on neighbouring lands. The area will not be used for carparking without a separate grant of permission for that future development. In the alternative, use for additional storage (cage/container) for residents of the proposed development.
- x. 37 no. surface level car parking spaces including 3 no. disabled access and 3 no. creche set down spaces and 10% fitted with electric charging points. 2 no. loading bays and 2 no. taxi set-down areas.
- xi. development of internal street network including a link road (84m long x 4.8m wide) to the south of the proposed 'Players Park' on land owned by Dublin City Council that will provide connectivity between the former 'Bailey Gibson' site and the 'Player Wills' site.
- xii. vehicular access will be provided via Donore Avenue with a one-way exit provided onto South Circular Road to the east of block PW1(the former factory building);
- xiii. replacement and realignment of footpaths to provide for improved pedestrian conditions along sections of Donore Avenue and South Circular Road and realignment of centreline along sections of Donore Avenue with associated changes to road markings;
- xiv. a contra-flow cycle lane is proposed at the one-way vehicular exit to the east of PW1 (former factory building) to allow 2-way cycle movements via this access point;

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- xv. decommissioning of existing 2 no. ESB substations and the construction of 2 no. ESB substations and associated switch rooms, 1 no. single ESB substation in PW 1 (43.5 sq.m) and 1 no. double ESB substation in PW2 (68 sq.m);
- xvi. the construction of a waste and water storage building (combined 133 sq.m, height 4.35m) to the west of building PW1;
- xvii. all ancillary site development works; drainage, rooftop solar photovoltaics (20 no. panels total), landscaping, boundary treatment and lighting.

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

### 5.1 European sites and habitats with links to European sites

The proposed development site is not under any wildlife or conservation designation. Furthermore, no rare, threatened or legally protected plant species, as listed in the *Irish Red Data Book 1 – Vascular Plants (Curtis & McGough, 1988)*, the *Flora Protection Order, 2015* or the *EU Habitats Directive*, are known to occur within the site.

The results of the ecological surveys undertaken at the site in 2019 and 2020 concluded that there are no habitats on the site of significant biodiversity value. There is virtually no habitat such as scrub that is suitable for use by nesting birds, and no evidence of swallows, swifts or other birds that nest on the walls of buildings has been recorded on the site. No evidence of any protected mammal species such as badger, or rare or protected plants, was recorded during the surveys carried out. The habitats present are not suitable for such species.

The bat surveys undertaken to date have not recorded any bats using buildings on the site for roosting or shelter, with only small numbers of bats foraging or commuting in the vicinity of the site. No invasive alien plant species listed on the Third Schedule of the *Birds and Natural Habitats Regulations* are known to be present on the site.

These findings were confirmed in the final, follow-up survey undertaken in September 2020 – there had been no significant changes to the habitats and species on the site during 2020.

Overall, the site has no key ecological receptors as defined by the ecological resource valuations presented in the National Roads Authority/Transport Infrastructure Ireland *Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA/TII, 2009 (Rev. 2))*.

No evidence of any habitats or species with links to European sites was recorded during either the field surveys or desk study undertaken in March and April 2020 and no ‘reservoir’ type habitats (habitats which have the potential to support Qualifying Interest/Special Conservation Interest species in any European site) are present.

#### 5.1.1 Potential impacts during construction

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

No watercourses are present within or connected to the proposed development site. The nearest watercourses to the site (the Grand Canal and the River Poddle (substantially culverted in this area), as well as the former Abbey Stream, which once ran through the site but has long since been diverted to a storm water culvert in Donore Avenue)) are not hydrologically connected to the proposed development site (according to the Civil Engineering Infrastructure Report for Planning, prepared by Barrett Mahony Consulting Engineers (December 2020) and submitted with the planning application).

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Nevertheless a theoretical potential surface water pathway, via the local surface water drainage network, exists between the proposed development site and coastal European sites associated with Dublin Bay (i.e. South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Island SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA). There is also a potential groundwater pathway between the proposed development site and the European sites should indirect discharges (i.e. spillages to ground) occur, or should any contamination on the site enter the ground water.

Despite the presence of these theoretical indirect pathways, the risk of contamination of any watercourses or groundwater is extremely low, and even in the event of a pollution incident significant enough to impact upon surface water quality on the proposed development site **this would not be perceptible in any European sites**, for the following reasons:

- The distance to the European sites – although for example the designated sites of Dublin Bay are between 5km and 13km from the proposed development site (straight-line distance to the east), there is no direct pathway between the proposed development site and these European sites.
- Any pollution from the construction site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the Bay;
- The fact that a significant level of dilution and mixing of surface and sea water would occur in any event. Upon reaching the bay any pollutants would be even further diluted and dissipated by the waters in Dublin Bay;
- The construction of the proposed development will take place over a comparatively short period (estimated to be 38 months) and there is no possibility of long-term impacts arising as a result of the construction elements of the proposed development, given the nature and scale of the proposed development and its location in the centre of a busy city at a remove from the European sites.

There is no possibility of any other potential direct, indirect or secondary impacts on any European site during the construction phase. For example there will be no land-take from any European site and there will be no resource requirements such as water abstraction. Similarly there will be no emissions to air from construction vehicles that could remotely impact any European site. Dust, noise and vibration arising during construction will similarly be entirely remote from any European site.

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

There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the construction of the proposed development, and no interference with the key relationships that define the structure or function of any European site.

### 5.1.2 Potential impacts during operation

Currently, the proposed development site is virtually entirely hardstanding. Rainfall events are un-attenuated at present. Once operational, **surface water** flows from the proposed development site will be restricted in accordance with the requirements of the Greater Dublin Strategic Drainage Strategy (GSDSDS). The GSDSDS addresses the issue of sustainability by requiring designs to comply with a set of drainage criteria which aim to replicate the run-off characteristics of the greenfield site. The criteria provide a consistent approach to addressing the increase in both rate and volume of run-off. The calculations set out in the Engineering Infrastructure Report prepared by Barrett Mahony Consulting Engineers and submitted separately incorporate a 20% increase in storage volume to allow for climate change.

It is proposed to use a sustainable urban drainage system (SuDS) approach to storm water management throughout the overall site. SuDS are a requirement of Dublin City Council under the GSDSDS and the Regional



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Code of Practice for Drainage Works. Additionally these systems are recommended under the 2009 guidelines published by the OPW, *'The Planning System and Flood Risk Management'*.

A **flood risk assessment** has been carried out by Barrett Mahony Consulting Engineers (it is included in the Engineering Infrastructure Report), in accordance with the OPW publication *"The Planning System and Flood Risk Assessment Guidelines for Planning Authorities"*. The report concluded that there is no risk of flooding affecting the site from fluvial sources, so it is possible to develop the site within Flood Zone C. Further, the development does not affect the flood storage volume or increase flood risk elsewhere.

There will be no operational impacts related to surface water management or flooding, on European sites or otherwise, as a result of the proposed development.

The new **foul drainage** system for the development will connect to the existing 300mm combined sewer in Donore Avenue at the north-east corner of the Player Wills site.

A Pre-connection Enquiry was submitted to Irish Water on 11<sup>th</sup> April 2019 with details of the development proposals and foul flow calculations. A response to the Pre-Connection Enquiry was received on 29<sup>th</sup> October 2019 and confirms feasibility of a connection to the Irish Water network at the proposed location without a need for network upgrades. A copy of the Pre-Connection Enquiry and Irish Waters letter of feasibility is included in Appendix II(c) of the Civil Engineering Infrastructure Report for Planning prepared by BMCE. Irish Water have also carried out the mandatory SHD design vetting on the proposed foul drainage design and issued a Statement of Design Acceptance for same. Refer to Appendix II(d) of the Civil Engineering Infrastructure Report for Planning, which contains the letter from Irish Water, dated 8<sup>th</sup> April 2020.

All flow rates and volumes are based on the Irish Water Code of Practice for Wastewater.

Foul wastewater discharge from the proposed development (Peak Discharge estimated to be approximately 10.5l/s, Daily Discharge approximately 24,6080l) will be treated at the Irish Water Wastewater Treatment Plant (WwTP) at Ringsend prior to discharge to Dublin Bay. The Ringsend WwTP operates under licence from the EPA (Licence no. D0034-01) and received planning permission (ABP Reg. Ref.: 301798) in 2019 for upgrade works, which are expected to be completed within five years. This will increase the plant capacity from 1.65m PE (population equivalent) to 2.4m PE. Regardless of the status of the WwTP upgrade works, at less than 0.1% of the capacity of Ringsend WwTP, the peak discharge from the proposed development is not significant in the context of the existing capacity available at Ringsend. Though the WwTP is currently over-capacity (the plant is currently accommodating 1.9m PE), recent water quality assessment undertaken in Dublin Bay (published by the EPA (see Section 3.3.1) confirms that Dublin Bay is classified as *"unpolluted"*. Discharge from the WwTP has been shown to rapidly mix and become diluted in Dublin Bay and there is no evidence that operations from the over capacity of the WwTP is affecting the conservation objectives of the European sites in Dublin Bay.

There will be no operational phase impacts related to foul water management, on European sites or otherwise, as a result of the proposed development.

There is no possibility of any other potential direct, indirect or secondary impacts on any European site once the proposed development is operational. There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the operation of the proposed development, and no interference with the key relationships that define the structure or function of any European site.

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

Full details of the potential impacts of the proposed development on European sites are presented in **Table 1**.

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Table 1 lists relevant European sites and outlines their Qualifying Interests/Special Conservation Interests and Conservation Objectives

European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
South Dublin Bay SAC (site code 000210), c.4.7km to the east (straight line distance)	<p>1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>The following habitats are listed as Qualifying Interests on the NPWS website, but are not included in the Conservation Objectives document:</p> <p>(1210 Annual vegetation of drift lines 1310 Salicornia and other annuals colonising mud and sand 2110 Embryonic shifting dunes)</p> <p>According to this SAC's site Conservation Objectives document (Version 1, dated 22<sup>nd</sup> August 2013), for the listed QI, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat for which the SAC has been selected.</p>	<p>No significant effects on water quality, and therefore on the site's QIs, are predicted.</p> <p>Surface/ground water arising during the site clearance, construction and operation of the proposed development at the Player Wills site could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea.</p> <p>There would be no significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5.1.1 and 5.1.2. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site, any pollution from the construction site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the Bay and would not be perceptible in South Dublin Bay SAC, due to the very small volumes.</p> <p>This is due to the significant separation between the proposed development site and the European site – the proposed development site is almost 5km (straight line distance) from the SAC and any pollution arising during construction would be so diluted as to be undetectable by the time the water enters the bay. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the bay any pollutants would be even further diluted and dissipated by the receiving waters, which are classified as unpolluted according to the EPA database of coastal water quality. Furthermore, the construction of the proposed development will take place over a comparatively short period and there is no possibility of long-term impacts arising as a result of the construction elements of the proposed development given the nature and scale of the proposed development and its location in the centre of a busy city at a remove from the European sites.</p> <p>There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development.</p> <p>No operational impacts on this European site will occur as a result of the proposed development.</p>
North Dublin Bay SAC (site code 000206), c.7.5km to the east	<p>1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>1210 Annual vegetation of drift lines 1310 Salicornia and other annuals colonising mud and sand 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</p>	<p>No significant effects on water quality, and therefore on the site's QIs, are predicted.</p> <p>Surface/ground water arising during the site clearance, construction and operation of the proposed development at the Player Wills site could contain pollutants (foul water, silt, hydrocarbons and</p>

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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	<p>1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)                      2110 Embryonic shifting dunes                      2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes)                      2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)*                      2190 Humid dune slacks                      1395 Petalwort (<i>Petalophyllum ralfsii</i>)</p> <p>According to this SAC’s site Conservation Objectives document (Version 1, dated 06<sup>th</sup> November 2013), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p>	<p>other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea.</p> <p>There would be no significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5.1.1 and 5.1.2. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site, any pollution from the construction site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the Bay and would not be perceptible in North Dublin Bay SAC, due to the very small volumes.</p> <p>This is due to the significant separation between the proposed development site and the European site – the proposed development site is approximately 7.5km (straight line distance) from the SAC and any pollution arising during construction would be so diluted as to be undetectable by the time the water enters the bay. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the bay any pollutants would be even further diluted and dissipated by the receiving waters, which are classified as unpolluted according to the EPA database of coastal water quality. Furthermore, the construction of the proposed development will take place over a comparatively short period and there is no possibility of long-term impacts arising as a result of the construction elements of the proposed development given the nature and scale of the proposed development and its location in the centre of a busy city at a remove from the European sites.</p> <p>There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development.</p> <p>No operational impacts on this European site will occur as a result of the proposed development.</p>
<p>Glenasmole Valley SAC (site code 001209), c.10.0km to the south west</p>	<p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)                      6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)                      7220 Petrifying springs with tufa formation (<i>Cratoneurion</i>)</p> <p>According to this SAC’s site Generic Conservation Objectives document (Version 7, dated 07<sup>th</sup> April 2020), for each of the listed QIs, the Conservation Objectives are to maintain or restore the</p>	<p>There is no hydrological link or any other pathway between the proposed development site at Player Wills and this SAC. It is approximately 10km distant and is completely unconnected. Furthermore there will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this SAC as a result of the proposed development.</p>



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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	
Wicklow Mountains SAC (site code 002122), c.10.5km to the south	<p>3110 Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>)</p> <p>3160 Natural dystrophic lakes and ponds</p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>4030 European dry heaths</p> <p>4060 Alpine and Boreal heaths</p> <p>6130 Calaminarian grasslands of the <i>Violetalia calaminariae</i></p> <p>6230 Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)</p> <p>7130 Blanket bogs (* if active bog)</p> <p>8110 Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>)</p> <p>8210 Calcareous rocky slopes with chasmophytic vegetation</p> <p>8220 Siliceous rocky slopes with chasmophytic vegetation</p> <p>91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p>1355 <i>Lutra lutra</i> (Otter)</p> <p>According to this SAC's site Conservation Objectives document (Version 1, dated 31<sup>st</sup> July 2017), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) for which the SAC has been selected.</p>	There is no hydrological link or any other pathway between the proposed development site at Player wills and this SAC. It is over 10km distant and is completely unconnected. Furthermore there will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this SAC as a result of the proposed development.
Baldoyle Bay SAC (site code 000199), c.12.5km to the north east	<p>1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>1310 <i>Salicornia</i> and other annuals colonising mud and sand</p> <p>1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</p> <p>1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)</p> <p>According to this SAC's site Conservation Objectives document (Version 1, dated 19<sup>th</sup> November 2012), for each of the listed</p>	There is no hydrological link or any other pathway between the proposed development site at Player wills and this SAC. It is over 12km distant and is completely unconnected. Furthermore there will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this SAC as a result of the proposed development.

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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	<p>QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p>	
<p>Rockabill to Dalkey Island SAC (site code 003000), c.13km to the east;</p>	<p>1170 Reefs 1351 Harbour Porpoise (<i>Phocoena phocoena</i>)</p> <p>According to this SAC's site Conservation Objectives document (Version 1, dated 07<sup>th</sup> May 2013), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p>	<p>No significant effects on water quality, and therefore on the site's QIs, are predicted.</p> <p>Surface/ground water arising during the site clearance, construction and operation of the proposed development at the Player Wills site could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea.</p> <p>There would be no significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5.1.1 and 5.1.2. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality in the proposed development site, any pollution from the construction site would be minimal in quantity and if it entered any watercourse it would be so diluted as to be undetectable by the time the water enters the Bay and would not be perceptible in Rockabill to Dalkey Island SAC, due to the very small volumes.</p> <p>This is due to the significant separation between the proposed development site and the European site – the proposed development site is approximately 13km (straight line distance) from the SAC and any pollution arising during construction would be so diluted as to be undetectable by the time the water enters the bay. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the bay any pollutants would be even further diluted and dissipated by the receiving waters, which are classified as unpolluted according to the EPA database of coastal water quality. Furthermore, the construction of the proposed development will take place over a comparatively short period and there is no possibility of long-term impacts arising as a result of the construction elements of the proposed development given the nature and scale of the proposed development and its location in the centre of a busy city at a remove from the European sites.</p> <p>There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed development.</p> <p>No operational impacts on this European site will occur as a result of the proposed development.</p>
<p>Howth Head SAC (site code 000202), c.13.1km to the north east</p>	<p>1230 Vegetated sea cliffs of the Atlantic and Baltic coasts 4030 European dry heaths</p>	<p>There is no hydrological link or any other pathway between the proposed development site at Player wills and this SAC. It is over 13km distant and is completely unconnected. Furthermore there</p>



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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	According to this SAC's site Conservation Objectives document (Version 1, dated 06 <sup>th</sup> December 2016), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitats for which the SAC has been selected.	will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this SAC as a result of the proposed development.
Rye Water Valley/Carton SAC (site code 001398), c.14.0km to the west	<p>7220 Petrifying springs with tufa formation (Cratoneurion)*            1016 Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>)            1014 Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>)</p> <p>According to this SAC's site Generic Conservation Objectives document (Version 7, dated 07<sup>th</sup> April 2020), for each of the listed QIs, the Conservation Objectives are to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p>	There is no hydrological link or any other pathway between the proposed development site at Player wills and this SAC. It is approximately 14km distant and is completely unconnected. Furthermore there will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this SAC as a result of the proposed development.
Knocksink Wood SAC (site code 000725), c.14.3km to the south	<p>7220 Petrifying springs with tufa formation (Cratoneurion)*            91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae)*</p> <p>According to this SAC's site Generic Conservation Objectives document (Version 7, dated 07<sup>th</sup> April 2020), for each of the listed QIs, the Conservation Objectives are to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected</p>	There is no hydrological link or any other pathway between the proposed development site at Player wills and this SAC. It is over 14km distant and is completely unconnected. Furthermore there will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this SAC as a result of the proposed development.
South Dublin Bay and River Tolka Estuary SPA (site code 004024), c.4.7km to the east (straight line distance)	<p>A144 Sanderling (<i>Calidris alba</i>)            A157 Bar-tailed Godwit (<i>Limosa lapponica</i>)            A149 Dunlin (<i>Calidris alpina</i>)            A162 Redshank (<i>Tringa totanus</i>)            A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>)            A143 Knot (<i>Calidris canutus</i>)            A192 Roseate Tern (<i>Sterna dougallii</i>)            A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)</p>	<p>No significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the site clearance, construction and operation of the proposed development at the Player Wills site could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea.</p> <p>There would be no significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section</p>

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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	<p>A141 Grey Plover (<i>Pluvialis squatarola</i>)                      A130 Oystercatcher (<i>Haematopus ostralegus</i>)                      A194 Arctic Tern (<i>Sterna paradisaea</i>)                      A193 Common Tern (<i>Sterna hirundo</i>)                      A137 Ringed Plover (<i>Charadrius hiaticula</i>)                      A999 Wetlands and Waterbirds</p> <p>According to this SPA's site Conservation Objectives document (Version 1, dated 9<sup>th</sup> March 2015), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.</p>	<p>5.1. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality locally, this would not be perceptible in the South Dublin Bay and River Tolka Estuary SPA.</p> <p>This is due to the significant separation and lack of a pathway between the proposed development site and the European site – the proposed development site is almost 5km (straight line distance) from the SPA and any pollution arising during development would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the sea any pollutants would be even further diluted and dissipated by the receiving waters, which are classified as Unpolluted according to the EPA database of coastal water quality. Furthermore, the construction of the proposed development will take place over a comparatively short period and there is no possibility of long-term impacts arising as a result of the construction elements of the proposed development.</p> <p>There will be no loss of species, fragmentation or disturbance to the special conservation interests of this site as a result of the proposed development.</p> <p>In addition, no operational impacts on this European site will occur as a result of the proposed development.</p>
<p>North Bull Island SPA (site code 004006), c.7.5km to the north east</p>	<p>A160 Curlew (<i>Numenius arquata</i>)                      A149 Dunlin (<i>Calidris alpina</i>)                      A157 Bar-tailed Godwit (<i>Limosa lapponica</i>)                      A162 Redshank (<i>Tringa totanus</i>)                      A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>)                      A144 Sanderling (<i>Calidris alba</i>)                      A156 Black-tailed Godwit (<i>Limosa limosa</i>)                      A143 Knot (<i>Calidris canutus</i>)                      A169 Turnstone (<i>Arenaria interpres</i>)                      A054 Pintail (<i>Anas acuta</i>)                      A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)                      A048 Shelduck (<i>Tadorna tadorna</i>)                      A052 Teal (<i>Anas crecca</i>)                      A141 Grey Plover (<i>Pluvialis squatarola</i>)                      A056 Shoveler (<i>Anas clypeata</i>)                      A130 Oystercatcher (<i>Haematopus ostralegus</i>)                      A140 Golden Plover (<i>Pluvialis apricaria</i>)</p>	<p>No significant effects on water quality, and therefore on the site's SCIs, are predicted. Surface/ground water arising during the site clearance, construction and operation of the proposed development at the Player Wills site could contain pollutants (foul water, silt, hydrocarbons and other chemicals). Such contaminated water could potentially discharge to the ground or the local surface water drainage network and from there, eventually, to the sea.</p> <p>There would be no significant effects on the conservation objectives of the European site should this occur, given the nature, size and location of the proposed development, as described in Section 5.1. Even in the event of a pollution incident (such as a fuel or cement spill) significant enough to impact upon surface/ground water quality locally, this would not be perceptible in the North Bull Island SPA.</p> <p>This is due to the significant separation and lack of a pathway between the proposed development site and the European site – the proposed development site is over 7km (straight line distance) from the SPA and any pollution arising during development would be so diluted as to be undetectable by the time the water enters the sea. In addition, significant dilution and mixing of surface and sea water would occur. Upon reaching the sea any pollutants would be even further diluted and dissipated by the receiving waters, which are classified as Unpolluted according to the</p>

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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	<p>A999 Wetlands and Waterbirds</p> <p>According to this SPA's site Conservation Objectives document (Version 1, dated 9<sup>th</sup> March 2015), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.</p>	<p>EPA database of coastal water quality. Furthermore, the construction of the proposed development will take place over a comparatively short period and there is no possibility of long-term impacts arising as a result of the construction elements of the proposed development.</p> <p>There will be no loss of species, fragmentation or disturbance to the special conservation interests of this site as a result of the proposed development.</p> <p>In addition, no operational impacts on this European site will occur as a result of the proposed development.</p>
<p>Wicklow Mountains SPA (site code 004040), c.10.6km to the south</p>	<p>A098 Merlin (<i>Falco columbarius</i>) A103 Peregrine (<i>Falco peregrinus</i>)</p> <p>According to this SPA's site Generic Conservation Objectives document (Version 7, dated 7<sup>th</sup> April 2020), for each of the listed SCIs, the Conservation Objectives are to maintain or restore the favourable conservation condition of the species for which the SPA has been selected.</p>	<p>There is no hydrological link or any other pathway between the proposed development site at Player Wills and this SPA. It is almost 11km distant and is completely unconnected. Furthermore there will be no loss of species, fragmentation or disturbance to the special conservation interests of this SPA as a result of the proposed development.</p>
<p>Baldoyle Bay SPA (site code 004016 ), c.12.7km to the north east</p>	<p>A137 Ringed Plover (<i>Charadrius hiaticula</i>) A048 Shelduck (<i>Tadorna tadorna</i>) A140 Golden Plover (<i>Pluvialis apricaria</i>) A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) A141 Grey Plover (<i>Pluvialis squatarola</i>) A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) A999 Wetlands and Waterbirds</p> <p>According to this SPA's site Conservation Objectives document (dated 27<sup>th</sup> February 2013), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.</p>	<p>There is no hydrological link or any other pathway between the proposed development site at Player Wills and this SPA. It is almost 13km distant and is completely unconnected. Furthermore there will be no loss of species, fragmentation or disturbance to the special conservation interests of this SPA as a result of the proposed development.</p>
<p>Dalkey Islands SPA (site code 004172), c.14.0km to the south east</p>	<p>A194 Arctic Tern (<i>Sterna paradisaea</i>) A193 Common Tern (<i>Sterna hirundo</i>) A192 Roseate Tern (<i>Sterna dougallii</i>)</p> <p>According to this SPA's site Generic Conservation Objectives document (Version 7, dated 07<sup>th</sup> April 2020), for each of the</p>	<p>There is no hydrological link or any other pathway between the proposed development site at Player Wills and this SPA. It is approximately 14km distant and is completely unconnected. Furthermore there will be no loss of species, fragmentation or disturbance to the special conservation interests of this SPA as a result of the proposed development.</p>





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European Site	Reasons for designation (information correct as of 08 <sup>th</sup> December 2020) (*denotes a priority habitat)	Source – Pathway – Receptor link
	listed SCIs, the Conservation Objectives are to maintain or restore the favourable conservation condition of the species for which the SPA has been selected.	

\*For completeness, this table includes all sites within 15km of the site, however, as confirmed in Section 5.1, only the offshore sites are linked in any way to the proposed development site. None of the other listed sites, and no sites further afield, are remotely linked to the proposed development site, by virtue of distance, lack of a pathway and the reasons for their designation.



## 5.2 Summary of potential impacts of the proposed development

There will be no loss of any habitat or species listed as a QI or SCI of any designated site as a consequence of the proposed development. There is, therefore, no potential for the effects of habitat loss or fragmentation to occur.

There will also be no significant effects on any European sites as a result of:

- Land-take;
- Resource requirements such as water abstraction;
- Impacts to habitat structure;
- Mortality to species (such as roadkill);
- Noise pollution/vibration impacts;
- Light pollution;
- Air pollution.

## 6 Other issues

No invasive plant species (*i.e.* those species listed on Schedule 3 of the *Birds and Habitats Regulations, 2011-2015*, such as Japanese knotweed or giant hogweed) were identified on site.

Additionally, for the reasons outlined in this report for the European sites, no impacts on any other designated sites including proposed Natural Heritage Areas, will occur.

## 7 No Mitigation specific to European sites

In relation to European sites, there will be no impacts as a result of the proposed development. Therefore no mitigation is necessary or proposed for the protection of European sites or which was intended to avoid or reduce impacts on any European sites. Accordingly, this screening assessment is consistent with the judgment of the European Court in Case C-323/17, *People Over Wind & Sweetman v Coillte* (Judgment of the Court (Seventh Chamber) of 12 April 2018) and the recent case-law of the High Court, including *Heather Hill Management Company CLG v An Bord Pleanála* [2019] IEHC 450 and *Sweetman v An Bord Pleanála* [2020] IEHC 39.

As noted in Section 5.1.2, operational Surface water management for the proposed development has been designed to comply with the '*Greater Dublin Strategic Drainage Study (GSDSDS) Regional Drainage Policies Technical Document – Volume 2, New Developments, 2005*' and it is proposed to use a sustainable urban drainage system (SuDS) approach to storm water management throughout the overall site. However, the High Court has held that compliance with SuDS is not a mitigation measure intended to avoid or reduce the impact on European sites: see *Eoin Kelly v An Bord Pleanála* [2019] IEHC 84.

## 8 In-combination effects

It is a requirement of Section 177U of the Planning Acts that when considering whether a plan or project will have a significant effect on a European site the assessment must take into account in-combination effects with other plans and projects. The assessment should consider plans and projects that are completed, approved but uncompleted, or proposed (but not yet approved).<sup>3</sup> If there are identified effects arising from the plan or project even if they are perceived as minor and not likely to have a significant effect on the integrity of a European site

<sup>3</sup> *Assessment of Plans and Projects Significantly Affecting European sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2001)*

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alone, then these effects must be considered ‘in-combination’ with the effects arising from other plans and projects.

The Dublin City Development Plan 2016-2022 contains a number of objectives intended to protect and enhance the natural environment, while encouraging development in appropriate areas. The Development Plan was itself subject to Appropriate Assessment, and a Natura Impact Report (NIR) was prepared. In its conclusions the NIR noted that *“the council’s commitments to the Habitats Directive and Appropriate Assessment that are presented in the plan will be sufficient to prevent inappropriate development that could result in adverse impacts on the conservation objectives of European sites”*.

The Plan took into account significant potential development in Dublin City, and included specific objectives for the Player Wills, Dublin City Council and Bailey Gibson Lands – these lands were designated as a Strategic Development and Regeneration Area (SDRA 12 – St. Teresa’s Gardens). It is noted that no impacts are expected on any European sites as a result of the proposed development at Player Wills, which is in full compliance with all of the relevant Plan Objectives.

The Strategic Development and Regeneration Area 12 (SDRA 12) development plan includes for the redevelopment of lands in the immediate environs of the Player Wills site. These include proposed developments at the Bailey Gibson Site to the west of the site and lands owned by Dublin City Council to the west of the site. A Masterplan has been prepared for the SDRA 12 lands. The Masterplan has been subject to Screening for Appropriate Assessment. The AA Screening process has concluded the Masterplan either on its own or in-combination with other developments will have no impact on the European sites.

A number of other plans were considered when assessing in-combination effects, but it was determined that there would be no in-combination effects with these:

- National Planning Framework;
- Regional Spatial and Economic Strategy;
- Greater Dublin Strategic Drainage Study;
- Greater Dublin Transport Strategy;
- Climate Action and Mitigation Plan;
- National Biodiversity Plan; and,
- River Basin Management Plan.

An application for Strategic Housing Development has been made for proposed development at the Bailey Gibson site (ABP Reg. Ref.: 307221). This development was subject to Screening for Appropriate Assessment and the AA Screening report concluded that there would be no likelihood of significant impact on any European sites as a result of the proposed development. An Bord Pleanála concluded that stage 2 AA was not required and planning permission for this development was granted by on 15<sup>th</sup> September 2020.

A number of other development projects have been granted planning permission in the local area by Dublin City Council or by An Bord Pleanála under Strategic Housing Development provisions. Developments with the potential for significant effects on European sites are listed below:

- 3323/17 (PL29S.300431): IDA Ireland, Newmarket, Dublin 8: Mixed use residential, commercial and cultural development;
- 2812/17: The Brewery Block, Dublin 8: mixed use student accommodation and co-working space;
- 3853/17 (PL29S.302149): 43—50 Dolphin’s Barn Street, Dublin 8: Mixed use residential and retail;
- 3426/18: The Donnelly Centre Phase 2 Building, Cork Street/Brickfield Lane, Dublin 8: Mixed use, student accommodation and commercial;

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- ABP 305061: 355 South Circular Road, Dublin 8 (The Rialto Cinema): Student accommodation.

Screening for appropriate assessment was undertaken for each of these proposed developments and in each case significant effects on European sites were excluded. There are no elements of these developments that could act in-combination with any potential effects of the proposed development to give rise to significant effects.

As assessed above, the proposed development will make a very small contribution to the overall capacity of the licensed WwTP at Ringsend. While there are capacity issues at the WwTP, substantial upgrades to capacity are expected to be delivered over the medium term. The drainage and water attenuation design included in the proposed development will have a net beneficial impact on capacity at the WwTP, particularly during heavy rainfall events. Water quality assessment undertaken in Dublin Bay confirms that Dublin Bay is classified as “*unpolluted*” and there is no evidence that operations from the WwTP are affecting the conservation objectives of the European sites in Dublin Bay. It is assessed that the proposed development in combination with the WwTP won't have any significant effects on any European sites including South Dublin Bay and River Tolka Estuary SPA, the South Dublin Bay SAC, the North Dublin Bay SAC and the North Bull Island SPA.

## 9 Screening conclusion

In view of best scientific knowledge this report concludes that the proposed development at Player Wills, individually or in combination with another plan or project, will not have a significant effect on any European sites. This assessment was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (An Bord Pleanála) to carry out an AA Screening, and reach a determination that the proposed development will not have any likely significant effects on European sites under Article 6 of the Habitats Directive in light of their conservation objectives.

## Appendix I: Background

The European<sup>4</sup> network is a Europe-wide network of ecologically important sites (SPAs and cSACs – also known as ‘European Sites’ or ‘Natura 2000 sites’) that have been designated for protection under either the EU Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) or the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna).

The main aim of the Habitats Directive is “to contribute towards ensuring biodiversity through the conservation of natural habitats of wild fauna and flora in the European territory of the Member States to which the treaty applies”. Any actions taken must be designed to “maintain or restore, at a favourable conservation status, natural habitats and species of wild fauna and flora of Community interest”. Under Article 6 of the Habitats Directive, an assessment is required where a plan or project may give rise to significant effects upon a European site.

In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process;

Article 6 (paragraphs (3) and (4)) of the Habitats Directive states that:

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

(4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

The requirements of the Habitats Directive are transposed into Irish law by means of the Birds and Natural Habitats Regulations and by the Planning Acts.

In Ireland, the statutory agency responsible for the designated areas is NPWS.

### Stages in the assessment

European Commission guidance (2001)<sup>5</sup> sets out the principles on how to undertake decision making in applying the Habitats Directive. The requirements of the Habitats Directive comprise four distinct stages:

**Stage 1: Screening** is the process which initially identifies the likely significant effects upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts may be significant. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the

<sup>4</sup> The EU Habitats Directive, Article 3.1, states “A Coherent European ecological network of Special Areas of Conservation and Special Protection Areas pursuant to Directive 79/409/EEC shall be set up under the title European”

<sup>5</sup> European Commission (2001) *Assessment of Plans and Projects Significantly Affecting European Sites: Methodological Guidance on the Provisions of Article 6 (3) and (4) of the Habitats Directive 92/43/EEC*

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effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, then an Appropriate Assessment must be made.

**Stage 2: Appropriate Assessment** is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine with scientific certainty whether or not there will be adverse effects on the integrity of the site in light of its conservation objectives. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.

**Stage 3: Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.

**Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4 an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the European network.

## Conservation Objectives of European sites

The conservation objectives for a European Site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as 'favourable' when:

- Its natural range and the area it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future;
- Conservation status of typical species is favourable as defined in Article 1(i).

The conservation status of a species will be taken as favourable when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future;
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Guidance from the European Commission<sup>6</sup> indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

The European Commission guidance recommends that screening should fulfil the following steps:

1. Determine whether the plan (or policy) is directly connected with or necessary for the management of European sites;
2. Describe the plan and describe and characterise any other plans or projects which, in combination, have the potential for having significant effects on European sites;
3. Identify the potential effects on European sites;

Assess the likely significance of any effects on European sites.

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<sup>6</sup> Managing European sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2000)

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