

Remote South Staff Car Park

Environmental Impact Assessment Report – Volume 3 Appendices

daa

June 2024

Appendix 2: Consultation

RECEIVED: 14/06/2024

Appendix 2.1: Scoping Letter

RECEIVED: 14/06/2024

Atkins
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Tel: +353 1 810 8000
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[snclavalin.com](https://www.sncclavalin.com)

Our reference: D21081 (WO03 – Staff Car Park South)

The Manager
Inland Fisheries Ireland
3004 Lake Drive
Citywest Business Campus
Dublin
D24 Y265
Ireland

1st November 2023

Dear Sir / Madam

RE: Consultation for EIA Scoping Stage - Staff Car Park South

Atkins Ireland Ltd (Atkins) on behalf of Dublin Airport Authority plc. (daa) are currently in the process of compiling an Environmental Impact Assessment Report (EIAR), Appropriate Assessment (AA) Screening and providing planning and environmental services for the above project, which is the subject of a proposed planning application to be lodged to Fingal County Council (FCC).

The preliminary project description of the proposed development is as follows:

- (1) the demolition of existing cattle pen and hard standing area (total 911m²) and the removal of 1 no. existing gated site entrance from the South Parallel Road (R108), and the construction of a westwards extension to the existing Holiday Blue Long-Term Car Park to provide an additional surface car park which will comprise 950 no. airport staff car parking spaces, of which 48 no. will be provided for Persons with Reduced Mobility (PRM) and 24 no. will be serviced by Electric Vehicle (EV) charging points, to be accessed off the South Parallel Road (R108) via an upgraded existing former temporary construction access/egress, with an emergency access also to be provided through the existing Holiday Blue Long-Term Car Park immediately east of the proposed development site via a tie in, with security barriers, to the existing internal roundabout;
- (2) 20 no. bicycle spaces;
- (3) 2 no. new bus shelters (10.3m² + 80m²);

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- (4) new internal road layout, with set down areas for buses and footpaths, incorporating 2 no. existing culverts (one of which is to be extended) and 1no. new culvert over the Santry stream;
- (5) proposed riparian corridor either side of the Santry stream;
- (6) 1 no. new single storey welfare building (62m²);
- (7) 1 no. new single-storey security hut (12.5m²) with security barriers;
- (8) new foul and surface water drainage system works incorporating attenuation;
- (9) the erection of CCTV equipment, security fencing, electrical enclosure, gate on the Horizon Road, lighting, signage, and boundary fencing; and,
- (10) all other associated site development works, including all hard and soft landscaping, on a site of approximately 4.26 hectares in the townland of Harristown, bound by the South Parallel Road (R108), Harristown Lane, Horizon Business Park, and the existing Holiday Blue Long-Term Car Park, Dublin Airport, Co. Dublin.

The proposed development will involve 3 no. crossing points proposed, as follows:

- To the east of the site: This is an existing culvert under the existing access road (culvert to be extended is 900mm diameter);
- In the centre of the site: This is an existing culvert of the stream which will be reused for pedestrian access; and,
- To the west of the site; Proposed new crossing point which will require a twin culvert.

Refer to Appendix 1 for the proposed site location. Refer to Appendix 2 for the indicative proposed site layout. It should be noted that the description of the development may be subject to change as the project progresses.

As part of the consultation phase, we would like to inform you of the proposed planning application for this project and seek any feedback, opinions or background information you may have in relation to the proposal by the 29th of November 2023. This information will be used to inform the environmental elements of our assessments.

If you require any further information regarding the project, please do not hesitate to contact Julie Larkin on 01 810 8000.

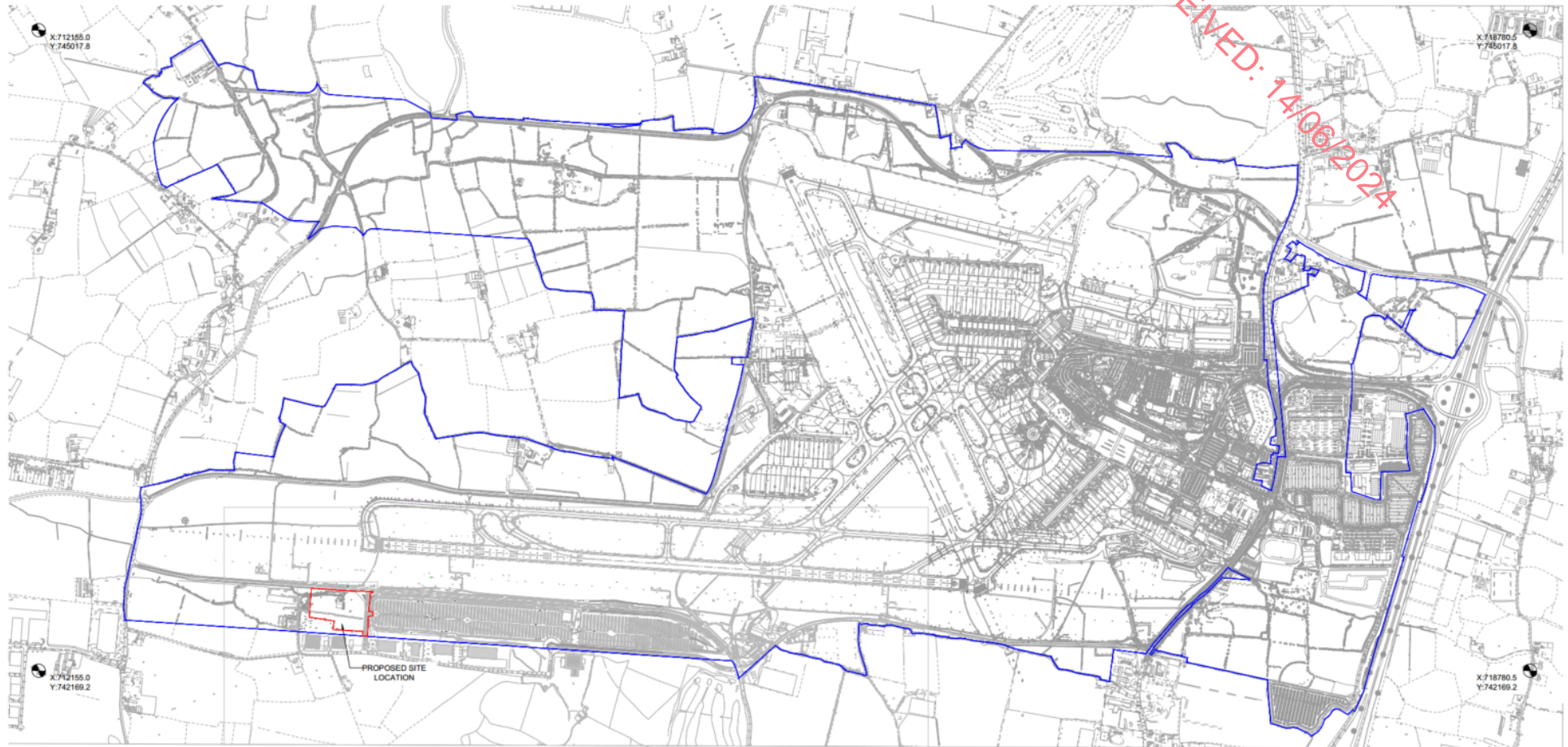
We would greatly appreciate it if you could provide any comments you may have at your earliest convenience to Julie Larkin by either email Julie.Larkin@atkinsrealis.com or the above address,

Yours faithfully,

Julie Larkin

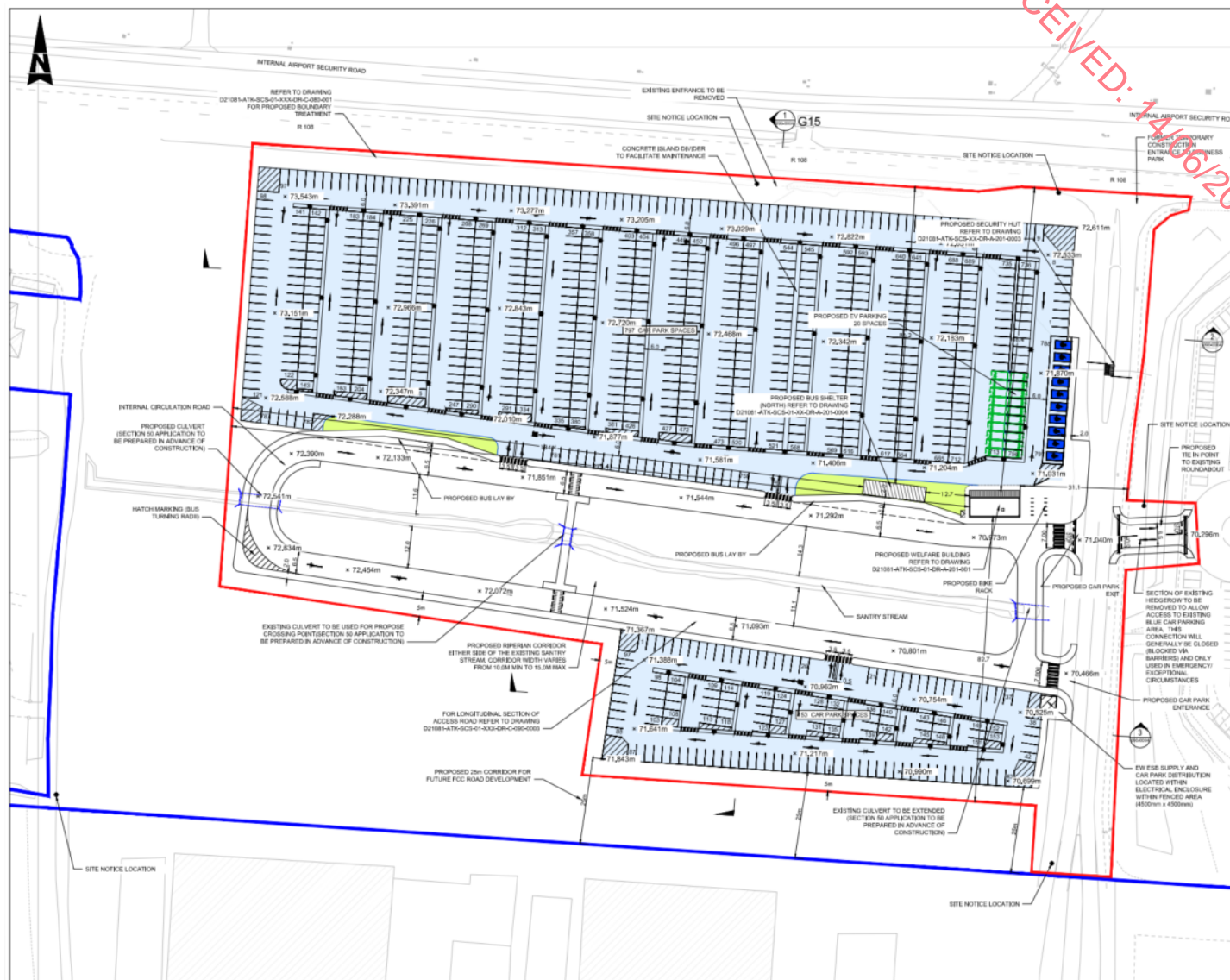
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Appendix 1: Proposed Site Location



RECEIVED: 14/08/2024

Appendix 2: Indicative Proposed Site Layout



Appendix 2.2: Pre-application Consultation Correspondence

RECEIVED: 14/06/2024

Larkin, Julie

From: DECC GSI Planning <GSIPlanning@GSI.ie>
Sent: 2023-11-28 10:59
To: Larkin, Julie
Cc: DECC Planning Advisory; DECC GSI Planning
Subject: RE: EIS 23/330 - Proposed Staff Car Park South, Dublin Airport
Attachments: 23_330 Car Park Dublin Airport.pdf; GSI datasets relevant to EIA & SEA-20210421.pdf

RECEIVED: 14/12/2024

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Julie,

With reference to your email received on the 02 November 2023, concerning the Consultation for EIA Scoping Stage –Dublin Airport Staff Car Park South, please find attached response and dataset sheet from Geological Survey Ireland.

Yours sincerely,
Trish Smullen



Trish Smullen Geoheritage & Planning.

Geological Survey Ireland, Booterstown Hall, Booterstown Ave., Co. Dublin A94 N2R6.

Email: trish.smullen@gsi.ie www.gsi.ie

A division of the Department of the Environment, Climate and Communications.

From: John Butler (DECC) <John.Butler@gsi.ie>
Sent: Thursday 2 November 2023 14:51
To: DECC GSI Planning <GSIPlanning@GSI.ie>
Subject: EIS 23/330 - Proposed Staff Car Park South, Dublin Airport

EIS 23/330

Proposed Staff Car Park South, Dublin Airport. Request for observations by Atkins. Letter with site plan is enclosed.

Regards,

John

From: DECC Duty Geologist <Duty.Geologist@decc.gov.ie>
Sent: Thursday 2 November 2023 11:49
To: Patricia Smullen (DECC) <Trish.Smullen@gsi.ie>; DECC GSI Planning <GSIPlanning@GSI.ie>
Subject: FW: Scoping Letter - Staff Car Park South

Hi Trish,
This came into Duty Geo. Looks like one for you.
Cheers,
Ted

From: Larkin, Julie <Julie.Larkin@atkinsrealis.com>

Sent: Thursday 2 November 2023 10:36

To: DECC GSI Planning <GSIPlanning@GSI.ie>; DECC Duty Geologist <Duty.Geologist@decc.gov.ie>

Subject: Scoping Letter - Staff Car Park South

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Dear Sir / Madam,

We are currently preparing an Environmental Impact Assessment for the Staff Car Park South. Please find attached a scoping letter for the Staff Car Park South.

As part of the consultation phase, we would like to inform you of the proposed planning application for the daa project and seek any feedback, opinions, or background information you may have in relation to the proposal. This information will be used to inform the environmental element of our assessment.

We have commenced our assessments and so would appreciate any comments you may have by 29th of November 2023 please in order to facilitate our current programme. We appreciate your time on this.

Kind regards,

Julie Larkin (she/her) BSc, MSc, MCIWEM C.WEM

Senior Environmental Consultant
Environmental / Infrastructure, Ireland

AtkinsRéalis

01 810 8000

150 Airside Business Park
Sword, Dublin, K67 K5W4, Ireland



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Atkins
Atkins House
150 Airside Business Park
Swords
Co. Dublin K67 K5W4

28 November 2023

Re: Consultation for EIA Scoping Stage – Dublin Airport Staff Car Park South

Your Ref: D21081 (WO03 – Staff Car Park South)
Our Ref: 23/250

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your email received on the 02 November 2023, concerning the Consultation for EIA Scoping Stage – Dublin Airport Staff Car Park South, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The Geological Heritage Audit for Fingal was completed in 2007. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the proposed Dublin Airport Car Park.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.



The Groundwater Data Viewer indicates an aquifer classed as a ‘Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones’ underlies the proposed Dublin Airport Car Park. The Groundwater Vulnerability map indicates the area is classed as ‘Low’ Vulnerability.

[GWClimite](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater.

The Groundwater Protection Response overview and link to the main reports is here: <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Our 3D models can help stakeholders visualize, understand and characterise geology, for deposit and resource mapping, for flooding and for urban geology applications including basement impact assessment, Sustainable Drainage Systems (SuDS), and subsurface management. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation. **Further information on the bedrock and Quaternary 3D models of Dublin is available [here](#) and [here](#).**

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the Data & Maps section of our website.

Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our [Geotechnical Map Viewer](#). We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed car park are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geochemistry of soils, surface waters and sediments for the Dublin Region

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. **This page also hosts urban geochemistry mapping (Dublin SURGE project) which may be useful to the project.**



Geological Survey Ireland has completed a geochemical characterization of the subsoil beneath large parts of Dublin, known colloquially as the Dublin Boulder Clay. The report documents the analysis completed on a third-party geochemical dataset obtained from the private sector and is accompanied by an excel spreadsheet containing the database of geochemical observations. Further details can be found at: <https://www.gsi.ie/en-ie/publications/Pages/Geochemical-characterization-of-the-Dublin-Boulder-Clay.aspx>

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological Survey Ireland Planning Team at GSIPlanning@gsi.ie.

Yours sincerely,

Geoheritage and Planning Programme

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fde2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca107c5c2b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b79416093beb221a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcaa.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turlough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d00b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?zesting=7&nothing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

Notes:

- The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
- Please read all disclaimers carefully when using Geological Survey Ireland data
- Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.

Larkin, Julie

From: Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>
Sent: 2023-11-28 16:18
To: Larkin, Julie
Subject: FW: Scoping Letter - Staff Car Park South
Attachments: Scoping Letter_WO03 Staff Car Park South_Department of Transport.pdf; 20231121 DoT submission.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Please find attached for your attention submission on behalf of the Department of Transport.

Kind regards
Jacqui

Jacqui Traynor
Central Policy, Coordination and Reform
An Roinn Iompair
Department of Transport
Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60
T +353 (0)1 604 1177
gcu@transport.gov.ie www.gov.ie/transport

From: Larkin, Julie <Julie.Larkin@atkinsrealis.com>
Sent: Thursday 2 November 2023 10:03
To: Transport inquiry officer <inquiryofficer@transport.gov.ie>; Transport Freedom of Information Request <FreedomInformation@transport.gov.ie>; Transport Department of Transport <info@transport.gov.ie>
Subject: Scoping Letter - Staff Car Park South

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Dear Sir / Madam,

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As part of the consultation phase, we would like to inform you of the proposed planning application for the daa project and seek any feedback, opinions, or background information you may have in relation to the proposal. This information will be used to inform the environmental element of our assessment.

We have commenced our assessments and so would appreciate any comments you may have by 29th of November 2023 please in order to facilitate our current programme. We appreciate your time on this.

Kind regards,



RECEIVED: 14/06/2024

Julie Larkin
Senior Environmental Consultant
Environmental / Infrastructure, Ireland
AtkinsRéalis
Atkins House, Airside Business Park
Swords, Co. Dublin, K67 K5

28th November 2023

RE: Consultation for EIA Scoping Stage - Staff Car Park South

Dear Julie,

The Department of Transport suggest that the daa consider liaising with the local authority to ensure the provisioning of the additional carparking spaces aligns with the local authority's strategies and policies, which contribute to national targets as specified in the Climate Action Plan.

The Department of Transport notes from the scoping letter that provision will be made for 20 bike parking spaces and 950 car parking spaces. In line with Government policy, focus is being placed on modal shift away from car use and towards sustainable and active travel. In this regard, the Department would encourage a re-examination of the ratio between bike and car parking spaces with a view to increasing the capacity for secure bike parking. In addition, it should be borne in mind that spaces should be accessible to pedal bikes, e-bikes and cargo bikes, where possible.

It would be appreciated if the Department of Transport could be kept informed of any further updates regarding this project.

Yours sincerely,

Liam Hawkes

Central Policy, Coordination and Reform
An Roinn Iompair
Department of Transport

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gcu@transport.gov.ie

Lána Liosain, Baile Átha Cliath, D02 TR60, Éire
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T +353 1 6707444 | info@transport.gov.ie
www.gov.ie/transport

Julie Larkin (she/her) BSc, MSc, MCIWEM C.WEM

Senior Environmental Consultant
Environmental / Infrastructure, Ireland

AtkinsRéalis

01 810 8000

150 Airside Business Park
Sword, Dublin, K67 K5W4, Ireland



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Julie Larkin
Senior Environmental Consultant
Environmental / Infrastructure, Ireland
Atkins Realis
150 Airside Business Park
Swords
Co. Dublin

RECEIVED: 14/06/2024

Dáta | Date
21 November 2023

Ár dTag | Our Ref.
TII23-125011

Re: Consultation for EIAR Scoping Letter - Staff Car Park South - Dublin Airport

Dear Ms. Larkin ,

TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (Department of the Environment, Community & Local Government, 2012).

Therefore, the issuing of this correspondence is therefore provided as best practice guidance only with respect to EIS scoping issues and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

The developer should have regard, *inter alia*, to the following in the preparation of the EIS:

- TII would be specifically concerned as to potential impacts, the development would have on any national roads (and associated junctions) in the proximity of the proposed development and in particular on the M1, M1 Link Road, M50 and associated junctions taking account of existing and expected traffic growth in the area.
- It would be important that, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. The Authority's Traffic and Transport Assessment Guidelines (2014) should be referred to in this regard. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
- In advance of any planning application, consultations should be had with the relevant Local Authority with regard to locations of existing and future public transport and active travel schemes and the development proposal shall identify and incorporate as part of any subsequent planning application any additional public transport and active travel measures that may be incorporated into the development proposal to reduce reliance on the use of the private car. Transport analysis should also consider;
 - a) A mobility management plan should accompany the transport assessment,
 - b) Modal share targets should be outlined and how any PT modal share is accommodated,
 - c) Measures proposed to reduce car dependency should be outlined,
 - d) Detailed phasing proposals of development with associated transport infrastructure provision is required,

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

- e) Consider and address cumulative impacts of other development and impacts on limited national road capacity,
- f) The traffic and transport assessment should consider all road users.

Mitigation measures should be aligned with phasing of road infrastructure improvements and required public transport interventions; all clearly outlined.

- TII recommends that measures should be continued to promote and support sustainable transport as included in the previous grant of planning permission by the Board for Terminal Two (ref. no.PL06F.220670). In regard to car parking for the Airport as a whole, TII would highlight the requirements of Conditions nos. 12, 23 and 24 of planning appeal reference no PL06F.220670 as well as Fingal County Council's Dublin Airport Local Area Plan 2020 and the County Development Plan.
- In the interests of clarity, TII would advise that TII VMS signage will not be available for airport use. Condition 19 of ref. no.PL06F.220670 indicates the requirement for implementation of a number of intelligent traffic management measures which should be extended to facilitate the development.
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.
- Consultations should be had with the relevant Local Authority with regard to locations of existing and future national road schemes and potential traffic management issues, in particular, with Fingal County Council.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- The developer, in conducting Environmental Impact Assessment, should have regard to TII Publications (formerly NRA DMRB and the NRA Manual of Contract Documents for Road Works).
- The developer, in conducting Environmental Impact Assessment, should have regard to TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006).
- The EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1st Rev., National Roads Authority, 2004)).

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practise.

I trust the above comments are of use in your EIS scoping process.

Yours sincerely,



Tara Spain,
Head of Land Use Planning

Larkin, Julie

From: Jemma McGuinness <Jemma.McGuinness@dublinbus.ie>
Sent: 2023-11-13 15:13
To: Larkin, Julie
Subject: Re: Consultation for EIA Scoping Stage , Case Ref - 1018819

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Julie,

This email is in relation to the recent letter that was sent in to Dublin Bus regarding the proposed expansion and associated works of the Blue Long Term Car Park.

From a Dublin Bus perspective we do not foresee any major issues arising from the works carried out. One query, will vehicular access to the site be through the Industrial estate or the R108?

Many thanks,

Jemma

Jemma McGuinness

Environmental Executive

Environmental, Health & Safety Department

Dublin Bus, 59 Upper O'Connell Street, Dublin 1 - D01RX04

E: jemma.mcguinness@dublinbus.ie M: 087 6789638

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Bus Átha Cliath-Dublin Bus, cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, cláraithe in Éirinn ag 59 Sráid Uí Chonaill Uachtarach, Baile Átha Cliath 1. Uimhir 119569

RECEIVED: 14/06/2024

Larkin, Julie

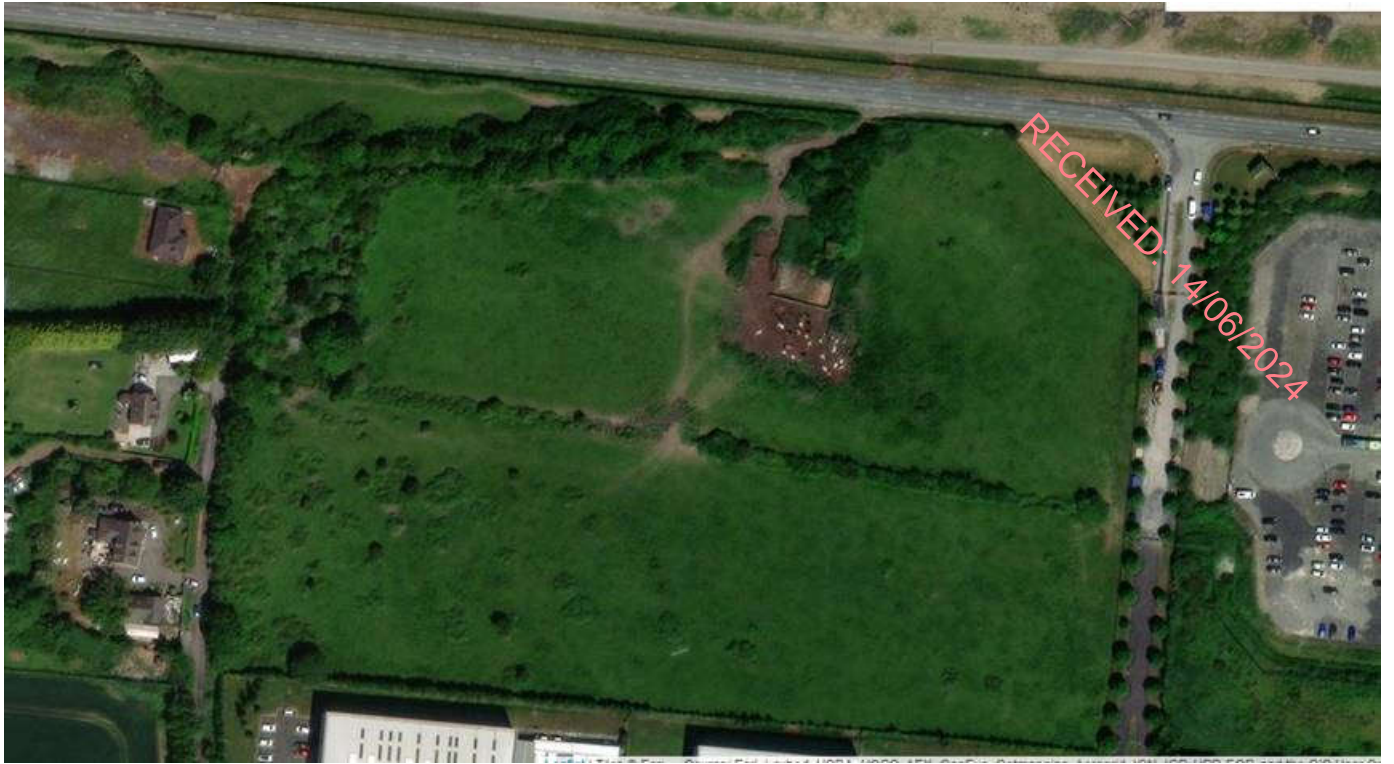
From: Conservation <conservation@fingal.ie>
Sent: 2023-11-08 21:18
To: Larkin, Julie
Cc: Christine Baker; Gemma Carr; Hans Visser; HughO'Neill; Colm Kelly
Subject: RE: Scoping Letter - Staff Car Park South

Follow Up Flag: Follow up
Flag Status: Flagged

RECEIVED: 14/06/2024

Hi,

You emailed me directly asking for comments on the attached but it should be noted that I am the Architectural Conservation Officer and my remit is architectural conservation/heritage. The sections of the council dealing with natural heritage, biodiversity or ecology are based in the Planning Dept. From the title of the scoping document you issued I am not sure if you are seeking comments in relation to biodiversity rather than architectural heritage. If it is the latter an examination of historic maps for the site indicate it to be a field that was bordered by a road/laneway to west and north that is named as Harristown Lane and led to Harristown House (which no longer exists as site is under the runway). Trees are noted on the first edition of the Ordnance Survey maps from 1843 along the northern boundary of the field. Aerial imagery of the site today show the line of this old route still appearing to exist in this location with a distinctive line of planting marking it, where it has been lost elsewhere due to road, parking and warehousing developments. The proposed carparking layout in your attached document eradicates any existing vegetation on the site and any traces of the historic route instead of utilising them. The Fingal Development Plan directs in Section 14.19.1 that a thorough site assessment informs the development of any design for a site but in this case the existing planting has not been considered for retention. There are other Fingal Development Plan policy and objectives that should inform the proposed design particularly those relating to greening of development, impacts on natural heritage, biodiversity and watercourses (such as Policy GINHP3 – Greening of Developments, Objective DMSO138 – Protection and Enhancement of Biodiversity, Objective IUO27 – De-culverting of Watercourses, Objective DMSO211 – De-Culverting to Restore Watercourses, Objective DMSO158 – Protection of Rivers and Streams) and so other sections of the council should be consulted in relation to the EIA for their comments (i.e. Parks and Landscapes Officer, Biodiversity Officer or Ecologist). The structures on the lands are described in your letter as cattle pen and hard standing area. There are no structures indicated on 1939 edition of OS Map so these are later 20th century farm structures. The Conservation Office has no specific matters to raise in relation to these. Archaeological considerations may need to be taken into account and so the Heritage Officer should be consulted.





Ordnance Survey Map published 1843

Regards,

Helena

Helena Bergin

Architectural Conservation Officer (Senior Executive)

Comhairle Chontae Fhine Gall, Halla an Chontae, Sórd, Baile Átha Cliath, K67 X8Y2

Fingal County Council, County Hall, Main Street, Swords, Co. Dublin, K67 X8Y2

Mobile: 087 7695304 | E-mail: helena.bergin@fingal.ie

**Comhairle Contae
Fhine Gall
Fingal County
Council**



From: Larkin, Julie <Julie.Larkin@atkinsrealis.com>

Sent: 02 November 2023 10:30

To: Conservation <conservation@fingal.ie>

Subject: Scoping Letter - Staff Car Park South

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Dear Sir / Madam,

We are currently preparing an Environmental Impact Assessment for the Staff Car Park South. Please find attached a scoping letter for the Staff Car Park South.

As part of the consultation phase, we would like to inform you of the proposed planning application for the daa project and seek any feedback, opinions, or background information you may have in relation to the proposal. This information will be used to inform the environmental element of our assessment.

We have commenced our assessments and so would appreciate any comments you may have by 29th of November 2023 please in order to facilitate our current programme. We appreciate your time on this.

Kind regards,

Julie Larkin (she/her) BSc, MSc, MCIWEM C.WEM

Senior Environmental Consultant
Environmental / Infrastructure, Ireland

AtkinsRéalis

01 810 8000

150 Airside Business Park
Sword, Dublin, K67 K5W4, Ireland



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Larkin, Julie

From: Planning <planning@iaa.ie>
Sent: 2023-11-16 16:14
To: Larkin, Julie
Cc: Planning
Subject: RE: Scoping Letter - Staff Car Park South

RECEIVED: 14/06/2024

Dear Ms. Larkin,

Thank you for your email and associated attachment regarding input into the Environmental Scoping Assessment in relation to the staff car park south project at Dublin Airport.

Based on the limited information provided, IAA's Aerodromes Division has no requirements for incorporation into the Environmental Scoping Assessment Report however we would recommend engagement with daa Dublin Airport and the Air Navigation Service Provider AirNav Ireland for their review and comment.

Best Regards,

Dave

From: Larkin, Julie <Julie.Larkin@atkinsrealis.com>
Sent: 02 November 2023 10:22
To: Planning <planning@iaa.ie>
Subject: Scoping Letter - Staff Car Park South

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Dear Sir / Madam,

We are currently preparing an Environmental Impact Assessment for the Staff Car Park South. Please find attached a scoping letter for the Staff Car Park South.

As part of the consultation phase, we would like to inform you of the proposed planning application for the daa project and seek any feedback, opinions, or background information you may have in relation to the proposal. This information will be used to inform the environmental element of our assessment.

We have commenced our assessments and so would appreciate any comments you may have by 29th of November 2023 please in order to facilitate our current programme. We appreciate your time on this.

Kind regards,

Julie Larkin (she/her) BSc, MSc, MCIWEM C.WEM

Senior Environmental Consultant
Environmental / Infrastructure, Ireland

AtkinsRéalis

01 810 8000

150 Airside Business Park
Sword, Dublin, K67 K5W4, Ireland



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Larkin, Julie

From: Geoff Hynes <Geoff_Hynes@hsa.ie>
Sent: 2023-11-03 14:20
To: Larkin, Julie
Subject: RE: Scoping Letter - Staff Car Park South
Attachments: Scoping Letter - Staff Car Park South.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

RECEIVED: 14/06/2024

To whom it may concern,

Please see attached in relation to the above.

Regards,

Geoff

Geoff Hynes
Inspector | CCPS Unit | Health & Safety Authority
Mobile: 087-6002298
Email: geoff_hynes@hsa.ie
Web: www.hsa.ie

Health and Safety Authority,
Metropolitan Building,
James Joyce Street,
Dublin 1,
D01 KOY8

An tÚdarás Sláinte agus Sábháilteachta,
An Foirgneamh Uirbeach,
Sráid James Joyce,
Baile Átha Cliath 1
D01 KOY8



An tÚdarás Sláinte agus Sábháilteachta
Health and Safety Authority

Ár bhFís: Saolta agus fiontair shláintiúla, shábháilte agus tháirgiúla
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Atkins
Atkins House 150
Airside Business Park
Swords Co. Dublin
K67 K5W4

Our Ref: 4255

03/11/2023

Re: Consultation for EIA Scoping Stage - Staff Car Park South] for development by Dublin Airport Authority plc. (daa) at Harristown Lane, Horizon Business Park, and the existing Holiday Blue Long-Term Car Park, Dublin Airport, Co. Dublin & your letter of 02 November 2023

To whom it may concern;

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015) gives technical advice to the Planning Authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

Since the above-referenced application appears to be outside the scope of the Regulations, the Authority has no observations to forward.

If you have any queries please contact the undersigned.

Yours sincerely



Geoff Hynes
Inspector,
COMAH, Chemical Production & Storage (CCPS)

Appendix 2.3: Dublin Bus Correspondence

RECEIVED: 14/06/2024

Larkin, Julie

From: Jemma McGuinness <Jemma.McGuinness@dublinbus.ie>
Sent: 2024-01-10 10:58
To: Larkin, Julie
Subject: Re: Consultation for EIA Scoping Stage , Case Ref - 1018819

Thanks Julie.

Regards,

Jemma

Jemma McGuinness

Environmental Executive

Environmental, Health & Safety Department

Dublin Bus, 59 Upper O'Connell Street, Dublin 1 - D01RX04

E: jemma.mcguinness@dublinbus.ie M: 087 6789638

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From: Larkin, Julie <Julie.Larkin@atkinsrealis.com>
Sent: Tuesday, January 9, 2024 4:04 PM
To: Jemma McGuinness <Jemma.McGuinness@dublinbus.ie>
Subject: RE: Consultation for EIA Scoping Stage , Case Ref - 1018819

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Hi Jemma

Happy New Year to you.

The vehicular access will be from R108.

Please let me know if you require further information.

Kind regards,

Julie Larkin (she/her) BSc, MSc, MCIWEM C.WEM

Senior Environmental Consultant

Environmental / Infrastructure, Ireland

AtkinsRéalis

T: 01 810 8000

150 Airside Business Park

Sword, Dublin, K67 K5W4, Ireland

From: Jemma McGuinness <Jemma.McGuinness@dublinbus.ie>
Sent: 2023-11-13 15:13
To: Larkin, Julie <Julie.Larkin@atkinsrealis.com>
Subject: Re: Consultation for EIA Scoping Stage , Case Ref - 1018819

RECEIVED: 14/01/2024

Hi Julie,

This email is in relation to the recent letter that was sent in to Dublin Bus regarding the proposed expansion and associated works of the Blue Long Term Car Park.

From a Dublin Bus perspective we do not foresee any major issues arising from the works carried out. One query, will vehicular access to the site be through the Industrial estate or the R108?

Many thanks,

Jemma

Jemma McGuinness

Environmental Executive
Environmental, Health & Safety Department
Dublin Bus, 59 Upper O'Connell Street, Dublin 1 - D01RX04
E: jemma.mcguinness@dublinbus.ie M: 087 6789638
Facebook: [dublinbusnews](#) Twitter: [@dublinbusnews](#)
Always know when your bus is due, click here for live updates <http://www.dublinbus.ie/rtpi>



At Dublin Bus, we believe in facilitating flexible work patterns, so while it suits me to email now, I do not expect a response or action outside of your own working hours.

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Stiúrthóirí Directors: Mr G Owens – Cathaoirleach Chairperson: E Howley, R Widdis, L Carroll, K Wallace (UK), C Maybury, E Murray, S Hannan & D Healy.
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Bus Átha Cliath-Dublin Bus, cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, cláraithe in Éirinn ag 59 Sráid Uí Chonaill Uachtarach, Baile Átha Cliath 1. Uimhir 119569

Appendix 2.4: FCC Meeting Minutes

RECEIVED: 14/06/2024

FINGAL COUNTY COUNCIL
PRE APPLICATION CONSULTATION MINUTES

Pre-Planning Reference No.	FPP000109
Location of Site	Harristown
Applicant/Notifier	Naomi Dowds, Coakley O'Neill
Date of Meeting	15 th May 2023
Attendees	<p><u>Fingal County Council</u> Deirdre Fallon, Planning Department Hugh O'Neill, Planning Department, David Ryan, Planning Department Paul Carroll, Transportation Planning Linda Lally, Transportation Planning Niamh O'Connor, Transportation Planning</p> <p><u>Dublin Airport Authority</u> Mark Finegan, daa Nipun Verma, daa Jane Roche, daa David Shannon, daa Iarfhlaith O Conchubhair, Atkins Julie Larkin, Atkins Colin Acton, Aecom Aiden O'Neill, Coakley O'Neill Naomi Dowds, Coakley O'Neill</p>
Development Description	950 space car park to a greenfield site outside the current Dublin Airport planning unit.
Site Zoning Objective	GE – General Employment
FEEDBACK ON PROPOSAL	
Please note that advice or opinions offered at consultations is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act, 2000, as amended.	

Issues Arising

FCC advised of the following in respect of the proposal:

The proposed development is of a significant scale. FCC noted that the pre planning consultation process has begun in respect of the infrastructural developments envisaged in the Dublin Airport Local Area Plan and the proposal for 950 private car parking spaces is significant in this context and should be encompassed in these consultations in order to ensure an integrated approach to intensification of use. The development may be considered premature otherwise, and in that context could be determined to contravene materially Objective SF02 of the Dublin Airport Local Area Plan 2020 and Objective DAO6 of the Fingal County Development Plan 2023-2029.

It was noted by FCC that previous planning applications referenced by the DAA which included the removal of car parking were assessed on their merits. In proposing and in consenting these developments the reduction in spaces was determined to be appropriate, in accordance with prevailing planning policy and with the proper planning and sustainable development of the area.

FCC noted that the implementation of these planning permissions represented an abandonment of the use of such areas for the purposes of car parking. FCC do not accept that condition 23 c of An Bord Pleanála Reference Number: PL 06F.220670 established a target or an ongoing entitlement to maintain a level of private car parking for staff. FCC also highlighted the extent of change in statutory planning, land use and transport policy with regard to the provision of private car parking.

Inadequate justification has been put forward to support the need for the proposed development. FCC do not concur that the details submitted demonstrate that the proposal represents displacement of car parking. The daa advised that they do not agree with the interpretation of FCC in this regard and remain of the view that the proposal for 950 staff car parking spaces on a greenfield site represents a displacement of car parking within the context of and contributing to efforts by the DAA to improve modal share.

Environmental

FCC noted the Environmental Impact Assessment screening report which had been submitted and which screened out EIA. FCC advised that they did not concur with the conclusions of the report and anticipated that EIA would be mandatory for the development.

FCC advised that a number of applications in the Airport Campus and in the proximate Horizon Logistics Park had required the preparation of a Natura Impact Assessment for Appropriate Assessment and that it was anticipated that this would also be applicable to the proposed development.

Appendix 5: Biodiversity

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Appendix 5.1: Natura Impact Statement

RECEIVED: 14/06/2024

Remote South Staff Car Park

Natura Impact Statement

daa

June 2024



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Document history

Revision	Purpose description	Origin-ated	Checked	Reviewed	Authorised	Date
P00	Draft	DB/KC	CW	KMcC	JL	20/02/2024
P01	Final	DB/KC	CW	KMcC	DL	23/04/2024
P02	Final	DB/KC	CW	KMcC	DL	07/06/2024

Client signoff

Client	daa
Project	Remote South Staff Car Park
Job number	D21081
Client signature / date	

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1. Introduction

AtkinsRealis have been commissioned by daa to prepare Appropriate Assessment Screening and a Natura Impact Statement (NIS) for a proposed Remote South Staff Car Park hereafter referred to as the proposed development.

The proposed development is based on Dublin Airport's staff commuting principle, which will assign staff parking permits in the remote car parks based on each employees' home location. This will ensure that the staff travelling to the south car park will be those living south of the airport, thereby removing the need for them to travel to the main airport campus and use the road network directly adjacent. The overall aim of this commuting principle is to rationalise surface access to the airport in the context of the ongoing discussions with Fingal County Council, the National Transport Authority and Transport Infrastructure in relation to Objective SF02 of the Dublin Airport Local Area Plan 2020.

The proposed development site is located adjacent to the existing, established, permanent Holiday Blue long-stay passenger car park. 950no. staff parking spaces are proposed as an effective extension to the Holiday Blue Car Park, to which a 'CP-Car Parking' specific objective applies, defined in the Fingal County Development Plan 2023-2029 as 'provide a car park'. The proposed parking spaces are to be used for all Dublin Airport staff, not exclusively daa staff. The development will supplement and make use of existing shuttle buses to transport staff to the main airport campus.

1.1. Need for Project

At Dublin Airport, and in the context of the Airport's Mobility Management Plan which remains focused on sustainable transportation modes, appropriate levels of staff parking are a fundamental requirement if the airport is to operate efficiently in line with national, regional and local planning policy objectives, and as recognised in the Terminal 2 permission (PL06F.220670 (F06A/1248)). The nature of airport travel demand means that a large proportion of staff arrive outside the traditional public transport operating hours. Staff parking is therefore essential for staff that arrive and work during unsocial hours, in order to provide them with reliable and safe passage to work. Refer to Figure 1-4. Analysis of staff arrival profiles indicates that although the AM peak hour (8:00 – 9:00) is the single hour with the largest proportion of staff arriving, over 42% of the daily total staff arrive before this, which is significantly higher than would be expected at most 'typical' employment locations. Since Terminal 2 was permitted (in 2007 under ABP Ref. No. PL06F.220670 (F06A/1248)), a number of essential airport developments have been permitted and constructed, resulting in a net loss of airport staff parking spaces, with staff having to park where possible on the Airport campus. This proposal will provide a co-ordinated, consolidated, and controlled approach to staff parking aligned with the total of 5,360no. spaces permitted by condition no. 23 of the Terminal 2 permission and endorsed by Section 8.6.1 of the Dublin Airport LAP. Refer to Coakley O'Neill (2024) Planning Statement for further detail which is submitted as part of planning application.

1.2. Project Description

The proposed site is located directly south of the western corner of the South Airport Runway, in the townland of Harristown. This proposed development is a proposed extension to the existing Holiday Blue Long-Term Car Park to cater for airport staff car parking at Harristown, Dublin Airport, Swords, Co. Dublin. The site is bounded by the South Parallel Road (R108) to the north, Harristown Lane to the west, Horizon Business Park to the south, an existing former construction access road to Horizon Business Park and the existing Holiday Blue Long-Term Car Park to the east in the townland of Harristown, Dublin Airport, Co. Dublin. Santry River (IE_EA_09S010300) crosses through the middle of the site and discharges to the North Bull Island (IE_EA_090_0100) transitional waterbody to the east of the site.

The lands on which the development is proposed is entirely within daa land ownership and are zoned in the Fingal County Development Plan 2023-2029 (the Plan) as '*GE – General Employment*', with the zoning objective being to '*provide opportunities for general enterprise and employment*'. Part of the proposed development site is located in the existing, established Holiday Blue Long-Term Car Park, which benefits from a specific '*Car Park*' objective in the Plan.

The proposed development is currently a greenfield site with an area of approximately 4.46ha. The proposed Remote South Staff Car Park will cater for 950 staff car parking spaces, of which 48 no. will be provided for Persons with Reduced Mobility (PRM) and 96 no. will be serviced by Electric Vehicle (EV) charging points. The proposed development will connect to the existing Holiday Blue Long Term Car Park to the east. The proposed development also includes cycle parking, a bus stop, substation and a welfare facility building and associated infrastructure. In addition, a new security hut with a toilet and sink will be located on the traffic island along the existing entrance road.

The site is to be accessed off the South Parallel Road (R108). An emergency access will be provided through the existing Holiday Blue Long-Term Car Park immediately east of the proposed development. The emergency access will be via a tie-in, with security barriers, to the existing internal roundabout.

The location of the proposed staff car park is illustrated in Figure 1.1 and 1.2. The proposed site layout of the proposed Remote South Staff Car Park is illustrated in Figure 1.3.

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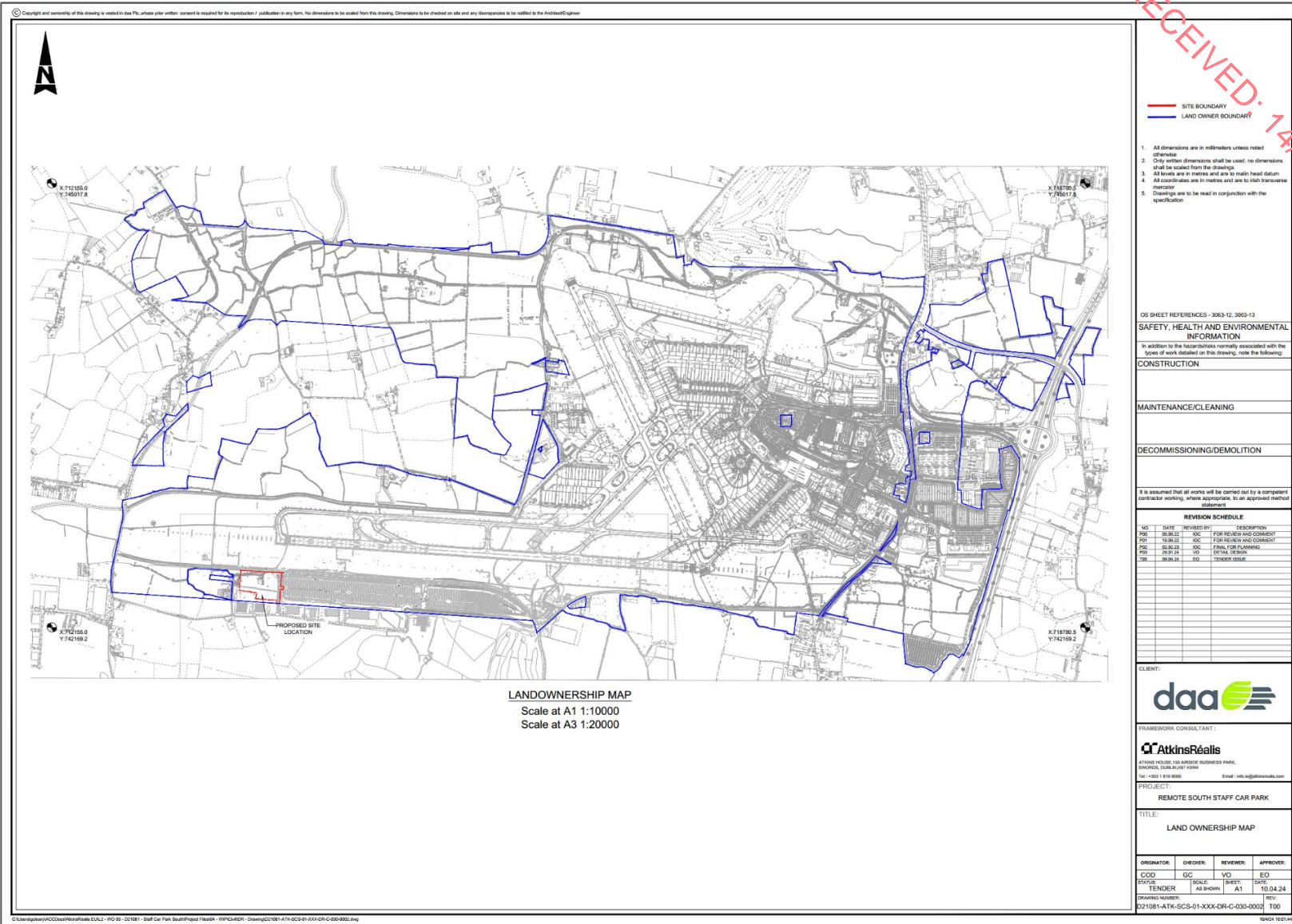


Figure 1-1 - Site Location.

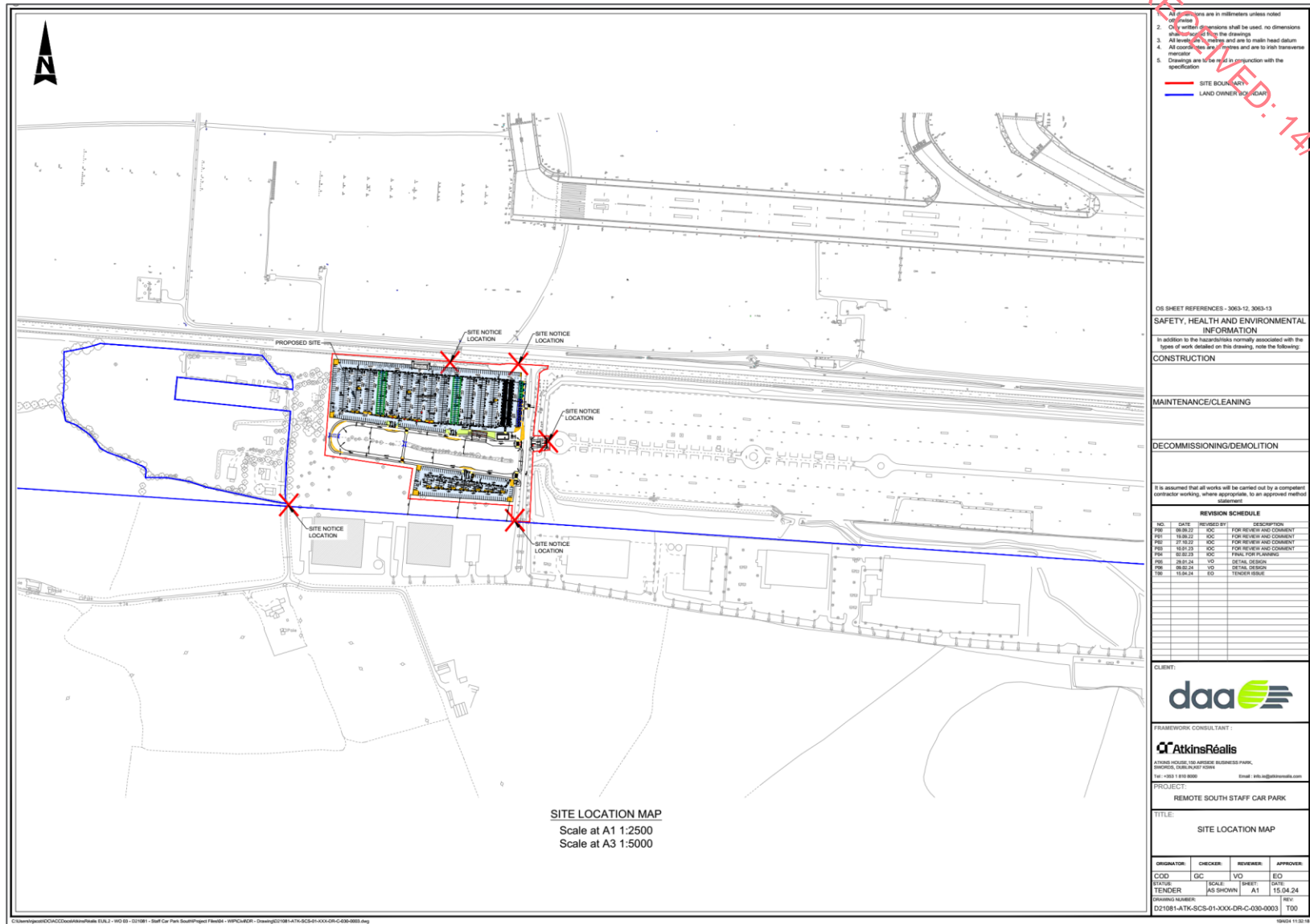
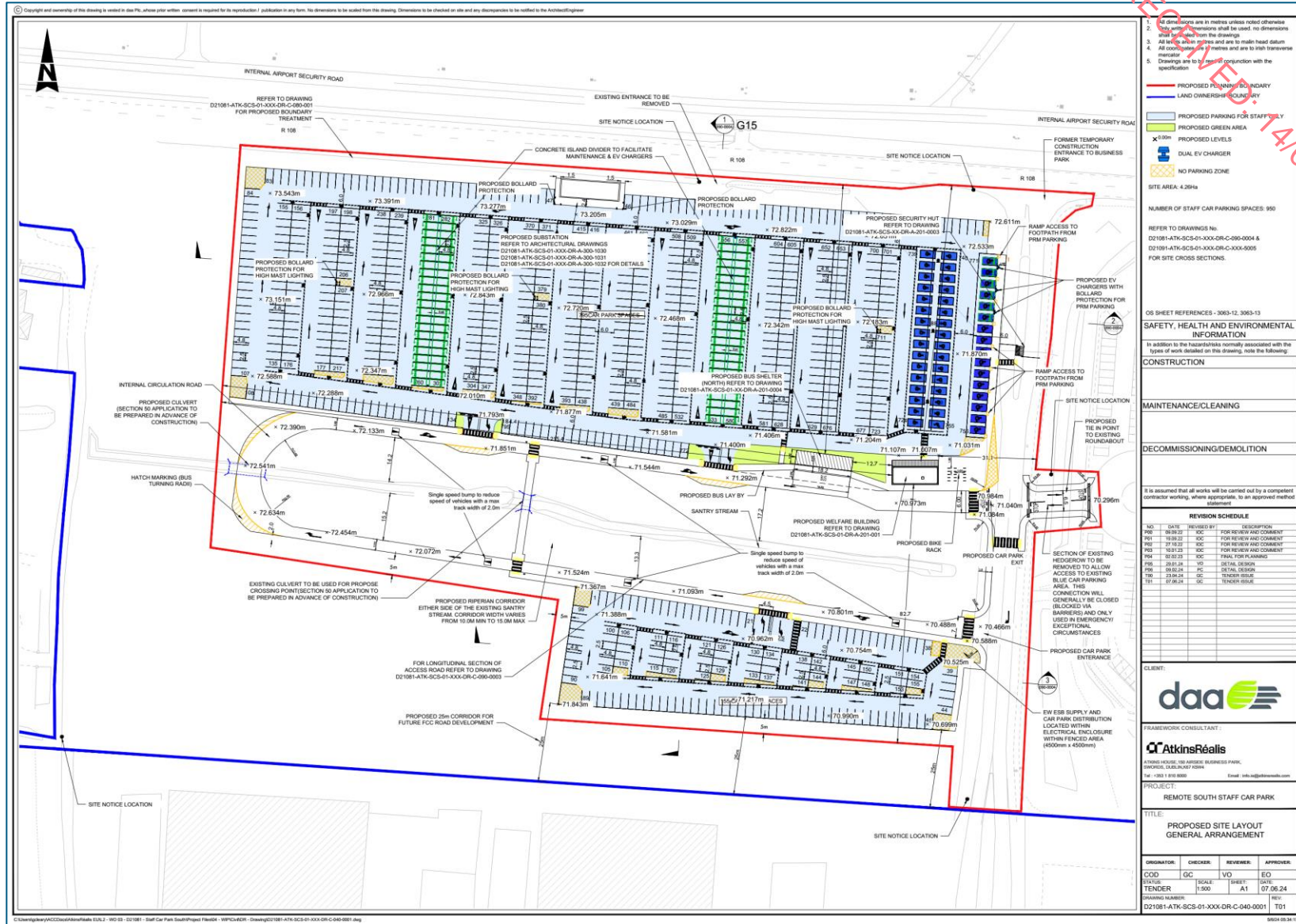


Figure 1-2 - Redline boundary of the proposed development.



1.3. Nature and Extent of the Proposed Development

The proposed development on a site of approximately 4.26ha, bounded by the South Parallel Road (R108) to the north, Harristown Lane to the west, Horizon Business Park to the south, and an existing former construction access road to Horizon Business Park and the existing Holiday Blue Long-Term Car Park to the east in the townland of Harristown, Dublin Airport, Co. Dublin.

The proposed development will consist of:

- 1) the demolition of existing cattle pen and hard standing area (total 911m²) and the removal of 1 no. existing gated site entrance from the South Parallel Road (R108), and the construction of a westwards extension to the existing Holiday Blue Long-Term Car Park to provide an extended surface car park which will comprise 950 no. airport staff car parking spaces, of which 48 no. will be provided for Persons with Reduced Mobility (PRM) and 96 no. will be serviced by Electric Vehicle (EV) charging points, to be accessed off the South Parallel Road (R108) via an upgraded existing former temporary construction access/egress, with an emergency access also to be provided through the existing Holiday Blue Long-Term Car Park immediately east of the proposed development site via a tie in, with security barriers, to the existing internal roundabout;
- 2) 30 no. bicycle spaces;
- 3) 1 no. new bus shelter;
- 4) new internal road layout, with set down areas for buses and footpaths, incorporating 2 no. existing culverts (one of which is to be extended) and 1no. new culvert over the Santry River;
- 5) proposed riparian corridor either side of the Santry River;
- 6) 1 no. single-storey substation;
- 7) 1 no. new single storey welfare building;
- 8) 1 no. new single-storey security hut with security barriers;
- 9) new foul and surface water drainage system works incorporating attenuation;
- 10) the erection of CCTV equipment, security fencing, electrical enclosure, lighting, signage, and boundary fencing; and
- 11) all other associated site development works, including temporary construction compound, and all hard and soft landscaping.

The site is located within Fingal County Council (FCC) and entirely on land owned by daa, within the boundary of Dublin Airport. Dublin Airport is located ca. 10km north of Dublin City Centre and 2km south of the closest town of Swords. Santry River crosses through the middle of the site and discharges to the North Bull Island transitional waterbody to the east of the site.

There are 3 no. crossing points of the Santry River within the site boundary proposed, as follows:

- To the eastern end of the site: This is an extension of the existing culvert under the existing access road (culvert to be extended is 900mm diameter);
- In the centre of the site: This is an existing culvert of the stream which will be reused for pedestrian access; and,
- To the western end of the site; This is the one new crossing point which will require a twin culvert.

1.4. Construction Methodology

The construction methodology will be carried out in 8no. phases, as follows:

Phase 1: Site Clearance and Demolition

It is proposed to demolish the existing cattle pen and hard standing area (total 911m²) as part of the proposed development, along with the removal of 1no. existing gated site entrance from the South Parallel Road (R108) and the existing secure fencing from the north-eastern corner of the site. Hedgerow and vegetation will be removed as part of this proposed development, as follows:

- The removal of an existing belt of trees and scrub from within the site.
- The removal of existing semi-mature trees located at the junction of the entrance road with the South Parallel Road in the north-eastern corner of the site.
- The removal of artificial mounding at the junction of the entrance road with the South Parallel Road in the north-eastern corner of the site.

The Contractor will be required to ensure that all demolition material is managed, stored and disposed of in an appropriate manner in accordance with all relevant waste legislation. Refer to Figure 1.4.

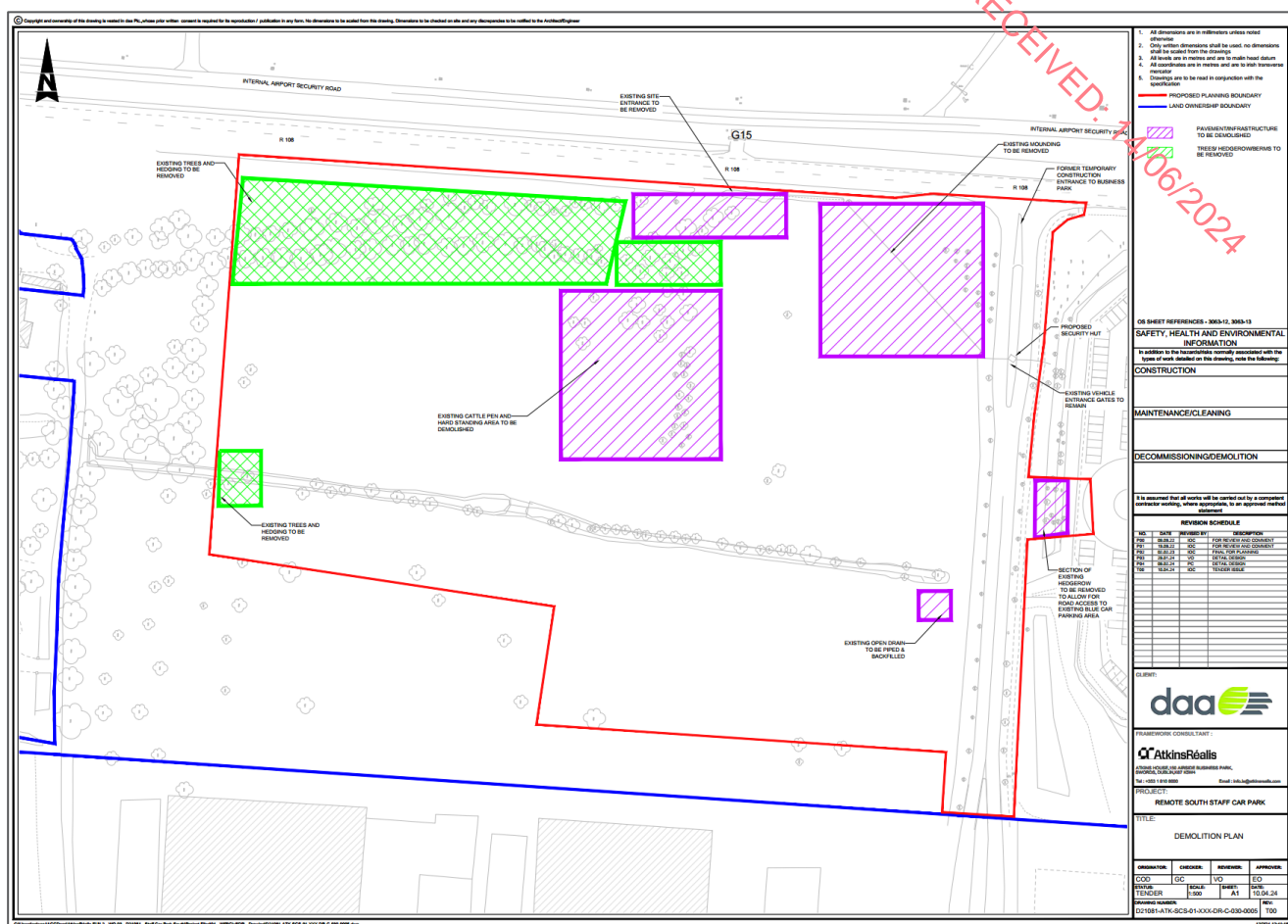


Figure 1-4 - Proposed demolition areas within the proposed development

Phase 2: Topsoil stripping

The topsoil layers will be stripped and generally disposed of offsite to an appropriately licensed facility by a licensed contractor. The total volume of soil to be excavated is ca. 20,220 tonnes. There will be ca. 550 tonnes of topsoil retained on site for landscaping. Soils should be placed in clearly identified stockpiles and chemical testing undertaken to confirm the potential for re-use on site, or, if considered inappropriate for re-use (due to geotechnical or chemical properties or being surplus), to inform off site treatment and/or disposal routes. Where soil materials meet the geotechnical and chemical criteria for re-use given the proposed end use scenario, such materials may be re-used on site, if required, for landscape purposes. Therefore there is potential to obtain additional excavation soil onsite for landscaping, depending on the chemical testing to confirm re-use. Topsoil to be retained shall be temporarily stored upon geotextile such as Terram 1000 (www.terram.com) and covered with same. The contractor is to submit proposals for supplier and product, which should be a nonwoven geotextile manufactured from UV stabilised, high tenacity, virgin polypropylene fibres that have been both mechanically and thermally bonded with a minimum of 5 years lifespan in all soil conditions. All excess soil will be removed off-site to an appropriate licenced waste facility by a licensed contractor / haulier.

Phase 3: Ground Works

The site will be excavated to the formation level depth specified in the design drawings. At this stage it is assumed that the existing sub-grade at formation level will have a CBR of 5%, this will be confirmed following the completion of site investigation works. The maximum excavation depth is ca. 5m bgl for drainage infrastructure and the majority of the site will be excavated to ca. 1.2m bgl for the pavement foundations. The extent of excavation for service / utility trenches will vary. Potential rock breaking will be required north of the Santry River due to the presence of a small area of bedrock outcrop or subcrop, based on a review of the GSI (2024) database. It is expected that the project will commence upon receipt of development consent, and it is estimated that the duration of the build will be ca. be 9 no. months.

Phase 4: Existing Underground Services and Drainage Connections

Storm Water Drainage

The surface water infrastructure for the site will mimic the natural drainage catchments of the existing site. The proposed site is split into two catchments, a northern catchment, and a southern catchment. At the eastern boundary, the stream is culverted under the unused access road prior to continuing to the south of the existing Holiday Blue car park. There is a second existing culvert crossing at the centre of the site which is currently used as a field crossing. The stormwater drainage system for the proposed development is presented as indicated on Drawings D21081-ATK-SCS-01-XXX-DR-C-520-0001, which is presented as part of this planning application.

Stormwater management for the proposed development is designed to comply with the Greater Dublin Strategic Drainage Study (GSDSDS) and CIRIA Design Report C753 'The SuDS Manual'. In addition, the storm drainage system has been designed in accordance with the key documents and standards as listed below:

- Fingal County Council Development Plan, 2023-2029;
- Dublin Airport Local Area Plan, 2020; and,
- Dublin Airport Sustainable Drainage Policy Document.

The catchments are separated by the Santry River which intersects and traverses the centre of the site flowing from the western boundary to the eastern boundary:

- The Northern catchment will have SuDS porous surfacing parking bays that will comprise of porous asphalt. The stormwater runoff will discharge into the permeable surface prior to collection by filter drains. The filter drains allow for adequate drainage of the permeable granular stone material into the proposed carrier drainage network.
- The Southern catchment will have SuDS porous surfacing parking bays that will comprise of porous asphalt. The stormwater runoff will discharge into the permeable surface prior to collection by filter drains. The filter drains allow for adequate drainage of the permeable granular stone material into the proposed carrier drainage network.
- It should be noted that internal circulation roads within the car park areas will be constructed of non-permeable asphalt but will be graded such that stormwater runoff drains from the surface to the adjacent porous car-parking bays.
- The main car park access circulation road will have an impermeable Stone Mastic Asphalt (SMA) surface which will be drained via the use of traditional road gullies.
- A vortex flow control device will be located downstream of the proposed carrier drainage network limiting flows to a maximum discharge rate specified below. Prior to discharge into the Santry River a bypass separator will ensure silts and oil is removed.
- Attenuation for both catchments is provided through the use of a proprietary modular geocellular structure with a maintenance/inspection tunnel for providing underground surface water attenuation storage and infiltration to manage storm water runoff. Refer to Engineering Planning Report (D21081-ATK-SCS-01-XXX-RP-C-XXX-0002) for further details.
- A petrol interceptor will be provided on each outfall from the site. Petrol interceptors work on the premise that some hydrocarbons such as petroleum and diesel float on the top of water. Class I bypass separators are proposed which enable the main collection chamber to be by-passed at times of heavy rainfall which prevents any collected oil from being flushed out. Class I bypass separators are designed to achieve a concentration of less than 5mg/l of oil. Kingspan Klargester Class 1 Bypass Petrol Interceptors or equal approved will be used prior to the discharge points north and south of the Santry River and will be NSBE010 and NSBP003 at the north and south catchments respectively.

The proposed development will incorporate a riparian strip along the length of the section of the Santry River in accordance with FCC Development Plan. The Santry River within the proposed development currently has two existing field crossing points for land access, the existing crossing locations will be re-used for road and pedestrian access for the proposed development. In addition, a third new crossing point to the west of the site will be constructed. A new headwall will be constructed at the existing culvert under the proposed access road to the south car-park.

Rainwater from the welfare building roof will be collected in a tank to be stored and re-used for greywater usage (toilets) in the block, this is regarded as a source control technique. The system will be located under the proposed development adjacent to the welfare building and the contributing catchment for harvesting will be the roof area of the block. The system will be fitted with an overflow that will discharge into the proposed carrier drain.

Foul Drainage

It is proposed to provide a new security hut with toilet and sink on the traffic island along the existing entrance road. In addition, a new welfare facility building shall be located at the entrance to the proposed development. The existing package pumping station serving the existing security hut will be removed and the new security hut and welfare building will connect, via a new gravity foul network, to a new package pumping station located adjacent the welfare building. The new pump station will connect to the existing rising main and the redundant sections of rising main will be removed as part of the removal of the existing pump station and the areas made good. The proposed underground packaged pumping station will include duty/standby sewage pumps and will include inbuilt emergency storage in case of breakdown. A pre-connection application to Uisce Éireann was submitted which included calculations of design wastewater flows in September 2022. AtkinsRéalis received a 'confirmation of feasibility' letter from Uisce Éireann in October 2022. The peak foul discharge from the proposed development was determined to be 0.58 l/s and the daily discharge will be 0.13l/s. The foul drainage system for the proposed development is presented as indicated on Drawings D21081-ATK-SCS-01-XXX-DR-C-520-0002, which is presented as part of this planning application. Refer to Engineering Planning Report (D21081-ATK-SCS-01-XXX-RP-C-XXX-0002) for further details.

Water Supply

It is proposed to connect the water supply for the development to the existing watermain spur located in the entrance road. For details of the watermain proposals refer to drawing D21081-ATK-SCS-01-XXX-DR-C-530-0001. The water supply for the site has been designed in accordance with Uisce Éireann Code of Practice and standard construction details. A pre-connection application to Uisce Éireann was submitted which included calculations of design water flows in September 2022. AtkinsRéalis received a 'confirmation of feasibility' letter from Uisce Éireann in October 2022. In line Fire Hydrants will be located on the watermain in accordance with Uisce Éireann standard construction details and "2006 Building Regulations" (Part B Fire Safety), so that no Fire Hydrant is > 46m and < 6m from any building. Refer to Engineering Planning Report (D21081-ATK-SCS-01-XXX-RP-C-XXX-0002) for further details.

Phase 5: Culverting Work

There are 3no. proposed crossing points of the Santry River within the proposed development. Two of the culverts are existing culverted crossing points, while the third (to the west of the site) will require a new culverted crossing point. A Section 50 application will be prepared as part of the detailed design. Culverts at these crossing points will be sized and constructed in accordance with final Section 50 approval from the OPW. The final headwall sizes will also be agreed with the OPW. Considering the river is not large and the fact that it is already culverted in two of the three proposed crossing points it is not envisaged that the hydraulics of the stream will be impacted.

- To the east of the site: This is an extension of the existing culvert under the existing access road (culvert to be extended is 900mm dia);
- In the centre of the site: This is an existing culvert of the stream which will be reused for pedestrian access; and,
- To the west of the site; This is the one new crossing point which will require a twin culvert.

This portion of the Santry River is not of fisheries importance. When the site was visited in July 2022 the drain was shallow, muddy and held very little water. It is anticipated, however, that the drain could hold more water following periods of rainfall. It will therefore be necessary to have a system on site which will allow the Contractor to pump (flume) water around the culvert works areas for the duration of works in order to allow culvert works to be undertaken in the dry.

This will be achieved by damming water upstream of the works area in order to create a reservoir of water from which waters can then be effectively pumped around the works area. This can be achieved by the introduction of a suitable impervious barrier at the upstream side of works (dam 1), using for example a line of sealed sandbags. Due to the small scale of the watercourse, the simplest method would be to pump the water into a settlement tank located on the riverbank from which clean water can then be discharged directly back to the drain downstream of the works. The settlement tank to be used should be sized to deal with the anticipated levels of water that might be encountered in the drain. This approach can be used in turn at each of the 3 locations where works are required.

Phase 6: Pavement Foundation

There will be 3no. different type of pavements, as follows:

- Pavement Type A – Footpath:
 - 100mm granular sub-base CL808;
 - Separation membrane impermeable plastic sheet 125 microns laid flat min 3000mm at overlaps; and,

- 100mm concrete to TII specification for road works CL1106.
- Pavement Type B – Road:
 - 40mm surface course SMA 10 PMB 65/105 60 DES PSV 60;
 - 60mm binder courses AC 20 HDM 70/100 DES;
 - 80mm Base course AC 32 HDM 40/50 DES; and,
 - 225mm min sub-base crushed CL808 on capping layer as required.
- Pavement Type C – Porous Asphalt:
 - 40mm porous asphalt surface course;
 - 110mm porous asphalt binder course; and,
 - 225mm min sub-base crushed CL808 on capping layer as required.

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For the proposed car park, a stone sub-base layer consisting of clean single size, crushed large stone with 30 – 40% percent voids will be provided. This serves as a structural layer and also temporarily stores stormwater as it discharges at a controlled rate into a drainage collection system. An impermeable membrane that does not allow water to pass through from the sub-grade into the stone recharge bed will also be provided.

Pavement

The pavement shall then be installed. Surface finish as follows:

- Main Circulation Road- SMA;
- Staff Car Parking Areas- Porous Asphalt; and,
- Passenger Car Parking Areas- Gravel.

Lining and Wayfinding

Road Markings and wayfinding signage will be provided in line with the daa requirements.

Phase 7: Construction

The construction of 1no. bus shelter, 1no. substation, 1no. new single-storey security hut and 1 no. new single storey welfare building within the proposed development.

Phase 8: All other associated site development works

The erection of CCTV equipment, security fencing, electrical enclosure, gate on the Horizon Road, lighting, signage, and boundary fencing.

1.5. Site Compound

The contractors site compound will be located within the red line boundary, in the northeastern portion of the site. The compound will be set up to securely enclose the working area around the new development envelope providing a working area, limited site storage and temporary welfare facilities comprising of the following:

- Canteen;
- Serviced Toilet;
- Site office;
- Site storage container; and,
- Lockable Mixed Waste Skip, to avoid Foreign Object Debris.

1.6. Environmental Management

The construction of the proposed development will be in accordance with the Outline Construction Environmental Management Plan (CEMP) submitted as part of this planning application (which takes account of the Schedule of Environmental Commitments presented within the submitted EIAR). This document will be further developed and added to within the Detailed CEMP which will be prepared by the Contractor in advance of the demolition and construction phases and will be fully implemented onsite for the duration of the construction phase of the project. Environmental monitoring will be carried out during the construction phase as detailed in EIAR Chapter 16 - Schedule of Environmental Commitments.

1.7. Traffic Management

The proposed transport routes of all machinery entering and egressing the site, for the full duration of the 9no. month phased construction period shall be through the proposed entrance off R108, north of the site. All

construction activities will be managed and informed by a Construction Traffic Management Plan (CTMP). The details of the CTMP will be agreed with the roads department of the Local Authority in advance of construction activities commencing on-site.

The final layout for the site compound will be included in the contractors detailed Logistics and Traffic Management Plan. The facilities will be adequate to provide accommodation for the number of operatives identified in the tender documentation. The Site Security plan will be developed with the contractor.

1.8. Waste Management

The construction of the proposed development will be in accordance with the Resource and Waste Management Plan (RWMP) included within the CEMP submitted as part of this planning application. The Contractor will prepare a detailed C&D Resource and Waste Management Plan (RWMP) in accordance with the relevant following guidance '*Best Practice Guidelines for the preparation of resource & waste management plans for construction & demolition projects*' (EPA, 2021) which will take full account of the CEMP submitted as part of this planning application. The Construction RWMP will provide a mechanism for monitoring and auditing waste management performance and compliance for the duration of the project. The document will also provide a detailed overview of key waste management considerations for the project and will be fully implemented onsite for the duration of the construction phase of the project.

1.9. Lighting Design

The lighting design for the proposed development has been developed with cognisance of the findings of a bat survey undertaken within the proposed development site. Bat survey evidence indicates that the west side of the proposed development site (i.e. around a small woodland and western treeline along Harristown Lane) were the main areas of bat activity and lighting has been developed in this area to be 'bat friendly'. The design of the lighting within and around the proposed development has been designed to be cognisant of minimising effects on local nocturnal species, such as bats and badgers, and has been developed so as to allow for a darker area around the western boundary of the proposed development site and also along the riparian corridor of the Santry River. The lighting scheme for the proposed development site has been developed with the following principals to the fore; only illuminating what needs to be illuminated (e.g. light directed to the car park area only), reducing night time light levels, reducing the height of the luminaires, shielding of luminaires and correct choice of light (e.g. a warm white spectrum <2700 Kelvins).

The lighting design follows Institute Lighting Professionals (ILP) Guidance Note 08/18 Bats and the artificial lighting scheme aims to minimise disturbance or disruption in key bats areas through the following design principles:

- LED luminaires shall be used due to the fact that they are highly directional, have lower intensity, have good colour rendition and dimming capability;
- On the western sections of the proposed development site a warm white spectrum <2700 Kelvins shall be used to reduce the blue light component of the LED spectrum;
- Luminaires shall feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;
- On the western sections of the proposed development site column heights shall be carefully considered to minimise light spill. The shortest column height allowed shall be used where possible (6m).
- All luminaires shall lack UV/IR elements to reduce impact;
- Only illuminating what needs to be illuminated (e.g. light directed to the car park area only); and,
- Reducing night time light levels

The amber white with a narrow band of light (with no blue light emission) will be proposed in certain areas to reduce light impacts outside of pathways along areas highlighted with bat activity. The lighting factors considered which will minimise the effect on bats are as follows:

- Minimising or prevent light spill to any areas forming part of the bats commuting corridors, for instance lighting a pathway; the light ideally will be at the path only with no uplight or illumination of nearby trees, bushes, river, waters, buildings, etc. Lighting schemes have been designed with luminaires that provide no uplight, or have narrow downward beams of light, and will have optics or shields that prevent back spill etc.
- Reflectance's - downward lighting can be reflected from bright surfaces, so using Black Tarmac instead of bright gravel or concrete for the pathway is considered. The same applies to other materials such as the colour finish on the lights, poles, walls, street furniture etc.

- Shielding of Luminaires & Light - it is proposed to add shields / baffles or natural objects (hedges, flowers etc) to block the luminaire / light from the flight paths of bats.
- Type of Light Proposed - principally LED lighting which has no UV with exact cut-off optics will be used.
- Lighting Controls - One of the peak-time for foraging for bats is during dusk. Lighting controls have also to be taken into consideration to reduce light and/or switch off luminaires.

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2. Scope of Study

The aim of this report is to provide supporting information to assist the competent authority; Fingal County Council to carry out an AA determination with respect to the proposed project.

2.1. Legislative Context

Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora, known as the 'Habitats Directive' provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of European Community interest, at a favourable conservation status. Articles 3 – 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservations of an EU-wide network of sites known as European sites. European sites are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC).

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans or projects that could potentially affect European sites. Article 6(3) establishes the requirement for Appropriate Assessment: -

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

Article 6 (4) deals with the steps that should be taken when it is determined, as a result of Appropriate Assessment, that a plan or project will adversely affect a European site. Alternative solutions, imperative reasons of overriding public interest (IROPI) and compensatory measures need to be addressed in this case. Article 6(4) states: -

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

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

2.2. Appropriate Assessment Process

Guidance on the AA process was produced by the European Commission (EC, 2001; 2018), which was subsequently used to develop guidance for Ireland by the Department of Environment, Heritage and Local Government in 2009 (DEHLG, 2009), National Parks and Wildlife Service in 2018¹ (NPWS 2018) and the Office of the Planning Regulator (2021). These guidance documents set out a staged approach to complete the AA process and outline the issues and tests at each stage. The stages outlined below are taken from the guidance document *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities* (DEHLG, 2009) and Office of the Planning Regulator; *Appropriate Assessment Screening for Development Management* (2021).

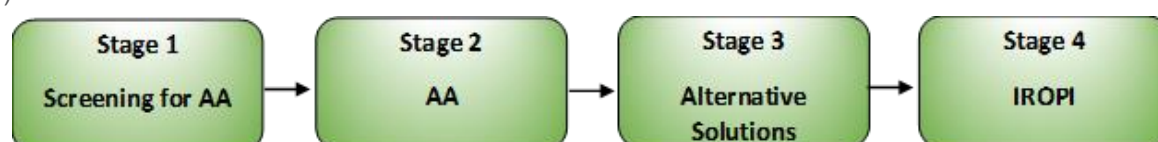


Figure 2-1 - Appropriate Assessment Process (Source: DEHLG, 2009).

¹ <https://www.npws.ie/development-consultations>

2.2.1. Screening for Appropriate Assessment

Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3): -

- i. Whether a plan or project is directly connected to or necessary for the management of the site, and
- ii. 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.

If the effects are deemed to be significant, potentially significant, or uncertain, then the process must proceed to Appropriate Assessment.

2.2.2. Appropriate Assessment

Appropriate Assessment considers whether the plan or project, alone or in combination with other projects or plans, will have adverse effects on the integrity of a European site, and includes any necessary mitigation measures.

The competent authority can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site(s) concerned. If this cannot be determined, and where sufficient mitigation cannot be achieved, the alternative solutions need to be considered and the process proceeds to the consideration of alternative solutions.

2.2.3. Alternative Solutions

This examines any alternative solutions or options that could enable the plan or project to proceed without adverse effects on the integrity of a European site. The process must return to AA as alternatives will require assessment in order to proceed. Demonstrating that all reasonable alternatives have been considered and assessed, and that the least damaging option has been selected, it is necessary to examine whether there are imperative reasons of overriding interest (IROPI).

2.2.4. IROPI

This examines whether there are imperative reasons of overriding public interest for allowing a plan or project that will have adverse effects on the integrity of a European site to proceed in cases where it has been established that no less damaging alternative solution exists. Compensatory measures must be proposed and assessed, of which the Commission must be informed.

The AA process only progresses through the full process for certain plans and projects. For example, for a project not connected with the management of a European site and where no likely significant effects on a European site in view of its conservation objectives are identified, the process stops at Screening for AA. Throughout the process the precautionary principle must be applied, which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty (EC, 2001; 2018).

3. Methods

3.1. Guidance documents

The Screening for Appropriate Assessment was prepared with reference and due consideration to the following documents and case law, including but not limited to: -

- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna. *Official Journal of the European Communities* L 206/7-50.
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. *Official Journal of the European Union* L 20/7-25.
- European Communities (Birds and Natural Habitats) Regulations, 2011. S.I. No. 77/2011 (as amended) ("the Habitats Regulations").
- Planning and Development Act, 2000. No. 30 of 2000 (as amended) ("the Planning and Development Acts").
- EC (2018) *Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*. European Commission, Brussels.
- EC (2021) *Assessment of plans and projects in relation to Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC*. European Commission, Brussels.
- DEHLG (2010a) *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Revised 11/02/2010*. Department of the Environment, Heritage and Local Government, Dublin.
- DEHLG (2010b) *Circular NPW 1/10 & PSSP 2/10. Dated 11/03/2010*. Department of the Environment, Heritage and Local Government, Dublin.
- NPWS (2012) *Marine Natura Impact Statements in Irish Special Areas of Conservation. A Working Document. April 2012*. National Parks & Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- OPR (2021) *Appropriate Assessment Screening for Development Management. OPR Practice Note PN01*. Office of the Planning Regulator, Dublin.
- Case law, including *Waddenzee* (C-127/02), *Sweetman v. An Bord Pleanála* (C-258/11), *Kelly v. An Bord Pleanála* (IEHC 400), *Commission v. Germany* (C-142/16), *People Over Wind* (C-323/17), *Holohan v. An Bord Pleanála* (C-461/17), *Eoin Kelly v. An Bord Pleanála* (IEHC 84) and *Heather Hill* (IEHC 450).

3.2. Desk Study

A desk study was carried out to collate information available on European sites in the vicinity of the proposed project. These areas were viewed using Google Earth, Google maps² and Bing maps³.

The National Parks and Wildlife Service (NPWS) and National Biodiversity Data Centre (NBDC) online databases were reviewed concerning European sites and their features of interest in the vicinity of the proposed project.

The Environmental Protection Agency (EPA) mapping⁴ system was used to identify any hydrological connection between the proposed project and European sites.

Locations and boundaries of all European sites within 15km of the proposed project were identified and reviewed using the NPWS online map viewer. Boundary shapefiles were also downloaded from this site to facilitate the preparation of project graphics.

Desktop information on relevant European sites were reviewed on the NPWS website, including the site synopsis for each SAC/SPA, the conservation objectives, the site boundaries as shown on the NPWS online map viewer, the standard Natura 2000 Data Form for the SAC/SPA which details conditions and threats of the sites, and published information and unpublished reports on the relevant European sites.

Surveys have been undertaken as part of the Dublin Airport Infrastructure Application (Planning Ref; F23A/0781). These field surveys were conducted between 2018-2023 to establish the non-breeding and breeding bird assemblage at the Dublin Airport and within the wider Zol of the airport lands, and to identify areas of importance

² <https://www.google.ie/maps>

³ <http://www.bing.com/maps/>

⁴ <https://gis.epa.ie/EPAMaps/>

to bird species. The findings of these site surveys, as detailed in the following documents, have also been used to inform this assessment;

- Aecom (2023) Dublin Airport Infrastructure Application, Environmental Impact Assessment Report.
- Aecom (2023) Dublin Airport Infrastructure Application, Appropriate Assessment Screening and Natura Impact Statement.
- Aecom (2023) Planning Application for Dublin Airport Infrastructure Application, Appendix 12-4, Baseline Report – Bird Technical Appendix.

Relevant planning information for the surrounding area was reviewed using the planning enquiry systems of Fingal County Council. Search criteria were implemented to determine whether such projects or plans would not be relevant to this study. Information on other daa projects proposed to be undertaken within the airport lands were also reviewed. This reviewed information was used to determine potential cumulative impacts from other plans / projects with the proposed works.

3.3. Site Visit

A multidisciplinary ecological walkover and bat survey of the proposed development site was carried out by an AtkinsRealis appointed ecologist, Caroline Shiel, on 17th & 18th June 2022. The site was subject to resurveying on 1st August 2023 by AtkinsRealis ecologist Daniel Blake.

Site survey evidence is presented in this report. Site surveys were undertaken within seasonally appropriate windows, within suitable weather conditions and full access to the site was available. There were no limitations posed which would influence the site surveys. The site surveys are considered sufficient to assess the predominant habitats and ecological feature of interest within the proposed development site.

3.4. Statement of Authority

The Screening for Appropriate Assessment report was prepared by Daniel Blake, Kevin Coogan and Colin Wilson. Kevin McCaffrey provided peer review and support.

Daniel Blake (Atkins Dublin) has a degree in Wildlife Biology and has been working in the environmental consultancy sector for the past six years. He has worked in both large scale government infrastructure projects as well as domestic projects across the UK and Ireland conducting both environmental and ecological roles. Primarily conducting protected species surveys such as bats, badgers, birds, reptiles, small mammals and amphibians as well as invasive species surveys. He has also earned a Natural England licence for the survey of Great crested newt. He has been involved in habitat surveying and assisted in the writing of Appropriate Assessments, Preliminary ecological appraisals and protected species reports. Throughout his career he has acted as an ECoW for numerous sites to ensure environmental laws and practices are met. He has been involved in water and soil sampling surveys, levelling surveys and creation of hibernaculum. Daniel assisted with the collation of background information to inform this report.

Kevin Coogan (AtkinsRealis) has a BSc (Hons) in Zoology from University College Dublin. He was developed ecological surveying skills through country-wide small river sampling experience, as well as habitat evaluation experience in Spain and Ireland. He has volunteer experience in bird surveying on North Bull Island SPA and Ireland's Eye SPA. Kevin assisted with the collation of background information to inform this report.

Caroline Shiel holds a first class honours degree (BSc) in zoology and a Ph.D. in zoology (ecology of Leisler's bat), both from NUIG. Since completing her Ph.D. in 1998, she has worked as an independent consulting ecologist, specialising in bats and other protected mammals. She also conducts habitat surveys and surveys of invasive species. She has extensive experience in conducting research projects, ecological surveys, on-site ecological supervision and in the preparation of reports. She regularly undertakes work on behalf of local authorities, OPW, Heritage Council, wind energy companies and private engineering companies. Caroline undertook the ecological site surveys, the findings of which are detailed in this report.

Colin Wilson (Atkins Dublin) has a BSc (Hons) in Environmental Science and is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). He has over 16 years working in the fields of ecology and environmental management. He is a Senior Ecologist with experience in ecological surveying, environmental assessment, on-site ecological supervision and mitigation. He has experience on multiple infrastructure projects regarding all elements of surface and groundwater management, monitoring, sampling and associated reporting. Colin also has a broad range of experience in invasive species management, biosecurity and control. Colin has prepared AA screening reports, Natura Impact Statements and has also been involved in the development of Environmental Operating Plans and Construction Environmental Management Plans for a number of national infrastructure projects. Colin is the author of this report.

Kevin Mc Caffrey (Atkins Galway) has a BSc (Hons) in Applied Freshwater and Marine Biology and a MSc in Environmental Sustainability. He is a Senior Ecologist with over 10 years' experience in freshwater and marine ecology, environmental surveying, impact assessment and as an Ecological clerk of Works. He has prepared and reviewed a wide range of technical reports including Environmental Impact Assessment, AA screening, Natura Impact Assessment and sanitary surveys. Kevin provided peer review and support for this assessment.

REVIEWED: 14/06/2024

4. Existing Environment

4.1. Desktop Review

4.1.1. Dunlin Airport Drainage

All stormwater drainage within Dublin airport lands is within the Water Framework Directive (WFD) Mayne subcatchment (SC_010 09_17). All surface hydrological features within the vicinity of the airport follow topography and flow in an easterly direction towards the coast. The surface water drainage network of the airport is further subdivided into seven distinct drainage catchment units, identified as; the Cuckoo Stream, the Wad Stream, Forrest Little Stream, the Mayne River, Kealy's Stream, the Santry River and the Ward River

The seven watercourses are detailed as follows: -

- The Cuckoo Stream rises to the west of the Airfield and flows in an easterly direction to join with the Mayne River before discharging to Mayne Estuary in the area of Baldoyle
- The Wad Stream is located to the north east of the Airport Lands which rises beneath the Halfpenny Golf Driving Range before flowing in an easterly direction towards Mayne Estuary;
- Forrest Little Stream rises to the north of Runway 11/29 before flowing in an easterly direction to join with the Sluice Stream subsequently discharging to Baldoyle Bay
- Kealy's Stream is located to the east of the airport before continuing in an easterly direction towards Baldoyle Bay
- The Santry River is located to the south west of the airport which discharges to Dublin Bay in the area of North Bull Island; and,
- Ward River is located to the west of the airport and flows in a north easterly direction to discharge into the Malahide Estuary.
- The Mayne River rises to the south of Runway 10/28 which flows in an easterly direction to discharge to Mayne Estuary/Baldoyle Bay.

The Santry River (EPA Code; Santry_010) crosses the proposed development site and continues eastwards before discharging to Dublin Bay. Site survey evidence identifies the watercourse as being more akin to a drain in character (FW4, as defined by Fossitt, 2000). The Santry River flows through Santry Demesne proposed Natural Heritage Area ca. 3.2km downstream of the proposed development site and outfalls to North Bull Island Transitional Waterbody, within North Dublin Bay, ca. 10.9km downstream of the proposed development site. The alignment of the Santry River is illustrated in Figures 4-1 and 4-2 below

4.1.2. Surface Water Quality

The EPA maintains a database of surface water features including rivers and lakes as well as water quality and risk status in accordance with the Water Framework Directive (WFD). The purpose of the WFD is to protect and enhance all waters including rivers, lakes, estuaries, coastal waters, and groundwater as well as water dependent wildlife and habitats. This involves improving or maintaining current water quality status with the aim of achieving 'Good' status for all waters; and mitigating against the risk of a decline in the water body quality status. The site is located within the Mayne_SC_010 WFD sub-catchment of the Liffey and Dublin Bay WFD catchment (EPA, 2024).

The Santry River, which traverses the centre of the proposed development site, has been assigned 'poor' river water quality status by the EPA, for the 2016 to 2021 monitoring period (EPA, 2024). The Santry River is 'at risk' of failing to meet the relevant WFD objectives by 2027 (EPA, 2024). The EPA undertake biological monitoring of the Santry River ca. 6.5km downstream of the proposed development site at Clonsaugh Road Bridge and Q values last recorded in 2022 were noted to be 2-3 indicating a 'poor' Q-Value status (Station Code: RS09S010300) (EPA, 2022).

The Santry River discharges to the Dublin Bay near North Bull Island ca. 10.9km downstream of the proposed development site, which is classified as having 'moderate' transitional waterbody status by the EPA for the 2016-2021 monitoring period (EPA, 2024) and is currently under review with regards to meeting the relevant WFD objectives by 2027. North Bull Island transitional waterbody in turn discharges to the Irish Sea, which is classified as 'good' coastal waterbody status by the EPA for the 2016-2021 monitoring period (EPA, 2024), and is currently 'not at risk' with regards to meeting the relevant WFD objectives by 2027.

4.1.3. Surface Water Quality: Physico-chemical monitoring

daa undertake routine surface water quality monitoring at key locations along the Santry River waterbody. Samples are selected for field measurement / laboratory analysis of all or some of the following parameters; pH, Temperature, Dissolved Oxygen, Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Ammonia (as N), Detergents, and Total Petroleum Hydrocarbons (TPH).

The Santry Stream runs through the Site in an easterly direction. Analytical surface water monitoring results for the monitoring period 2020-2023, at monitoring location SW-S-3, were reviewed as part of this assessment. SW-S-3 is located downstream of the proposed development, within airport land ownership, in the existing adjacent car park and as such gives an indication of the Santry River's catchment areas water quality as it leaves the airport lands.

Tabulated data for the four year monitoring period, which has been screened against the relevant generic assessment criteria (Surface Water Regulations - S.I. No. 272 of 2009 as amended – S.I. No. 327 of 2012, S.I. No. 386 of 2015 and S.I. No. 77 of 2018).

It is noted that the SW-S-3 monitoring locations is located downstream of both the proposed development and the existing Existing Holiday Blue car park; hence the results may be influenced by activities in the Existing Holiday Blue car park.

Results

Grab samples were collected on a monthly basis between December 2019 and October 2023, at daa monitoring location SW-S-3. Refer to Appendix 12.2 for Nicholas O 'Dwyer Monitoring Plans Sampling Locations.

pH values for the entire period between 2019 and 2023, ranged from 7.39 to 8.07 pH units. Therefore, all of the samples collected were within the acceptable statutory range of values of 6.0 to 9.0 pH units.

Measured temperatures were only recorded between December 2019 and January 2021, ranging from 6.3 to 16°C. This range is likely due to seasonal fluctuations in ambient temperatures.

Reported Ammonia (as N) concentrations for the entire monitoring period ranged from <0.01 to 1.13 mg/l. Just over 50% of the samples collected, recorded a concentration exceeding the relevant generic acceptance criteria (GAC) of 0.065mg/L (as N) (Surface Water Regulations (S.I. No. 272 of 2009) as amended). The mean value for this monitoring period was ca. 0.113mg/l. TPH concentrations for the entire monitoring period have been consistently recorded as <1 µg/l.

Orthophosphate concentrations for the entire monitoring period ranged from <0.01 to 0.21ug/l. 9no. of the samples collected, recorded a concentration exceeding the relevant GAC of 0.06mg/l. The mean value for this monitoring period was below the relevant GAC, at 0.046mg/l.

Based on a review of available surface water monitoring data over a four year monitoring period, no significant surface water quality issues have been identified at monitoring location SW-S-3, along the Santry River, downstream of the proposed development and the existing car park.

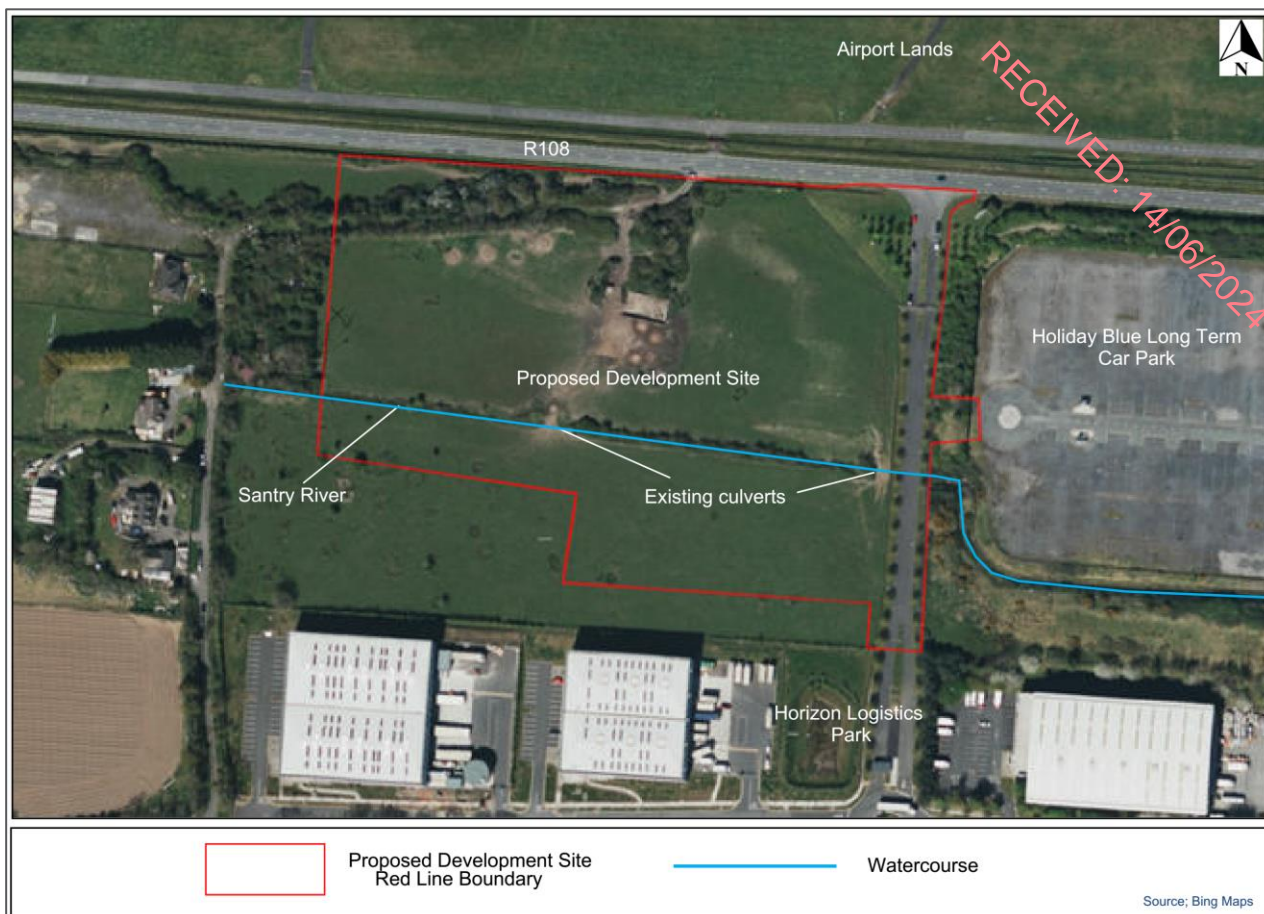


Figure 4-1 - Santry River within the proposed development site.

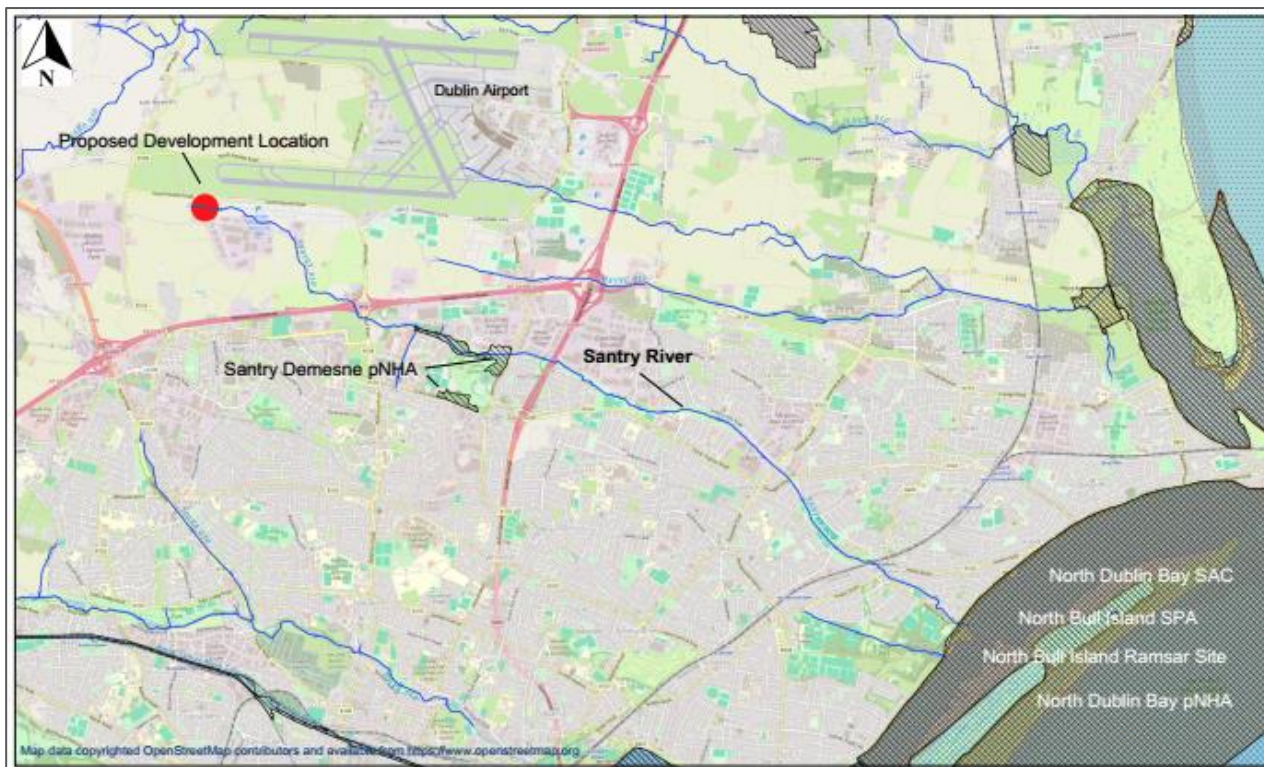


Figure 4-2 – Santry River alignment.

4.1.4. Hydrogeology

The proposed development site is located within the Dublin Water Framework Directive groundwater body area. The proposed site is underlain by a locally important bedrock Aquifer which is moderately productive only in local zones (GSI, 2022).

The proposed development site is underlain by locally important aquifer bedrock which is moderately productive only in local zones (GSI, 2022). Groundwater vulnerability rating beneath the car park has been classified by GSI (2022) as 'low'.

4.1.5. Flood Risk

AtkinsRéalis has been commissioned by daa to prepare a Flood Risk Assessment in support of the daa plc. planning application for the development proposed Remote South Staff Car Park to the west of the existing long-term blue car-park, to the south of Dublin Airport.

This Flood Risk Assessment (FRA) is presented in the accompanying EIAR Appendix 12.3 (Volume 3). The purpose of the *Stage 1 Flood risk identification* process is to establish whether a flood risk issue currently exists or may exist in the future. If no potential flood risk is identified, then the overall assessment can conclude at this point. However, if a potential flood risk issue is identified the risk will be investigated in further detail by undertaking a *Stage 2 – Initial flood risk assessment*.

- Based on the *Stage 1 – Flood risk identification* findings identify that the site is located within Flood Zone C. The proposed development is classified as a '*less vulnerable development*' as per the vulnerability classification in the planning guidelines. Following the sequential approach, it is deemed that a Justification Test for the proposed development is not required, and the site is suitable for the proposed development.

The following design measures have been applied to the proposed development, as detailed within the FRA (AtkinsRéalis, 2024):

- Proposed site levels are designed such that overland flow will not flood the welfare building or footpaths. Surface water runoff is designed to remain within the bounds of roadway reservations where possible and direct runoff to water compatible development areas and open space areas away from the building. Overland flow routes for pluvial events shall not be built on or become blocked off.
- The site drainage system is designed to cater for the 1 in 2-year return period for underground pipes flowing full of surcharge capacity up to 1 in 30 year event. The site attenuation system is designed to cater for the critical 1 in 100-year event. Climate change is applied at 20%. If the capacity of the site drainage is exceeded and overland flow occurs, proposed site levels are designed such that overland flow will not flood buildings or footpaths. Surface water runoff is designed to remain within the bounds of roadway reservations where possible and direct runoff to water compatible development areas and open space areas away from buildings.
- The proposed petrol interceptors and flow control will be maintained on a regular basis to reduce the risk of a blockage. If the site drainage system becomes blocked and overland flow occurs, proposed site levels are designed such that overland flow will not flood buildings or footpaths. Surface water runoff is designed to remain within the bounds of roadway reservations where possible and direct runoff to water compatible development areas and open space areas away from buildings.

4.2. Predominant Habitats within the Proposed Development Site

The following section details the predominant habitats found within the proposed development site as noted during site surveys undertaken in June 2022 and August 2023.

The site is located on the southern side of the R108 regional road and east of Harristown Lane. Large warehouses in Horizon Logistics Park are located directly south of the site and a roadway and car park is located to the east of the site.

The proposed development area is a greenfield site predominantly consisting of Improved Agricultural Grassland (GA1) with thistles (*Cirsium spp.*) and ragwort (*Jacobaea vulgaris*) throughout the field.

There is a ca. 180m laneway comprised of hardstanding artificial surfaces (BL3) and a large concrete formed cattle crush along the northern section of the site. The entrance gate and laneway from Harristown Lane (west side of site) is overgrown and impassable. Each side of the laneway is flanked with a treeline (WL2) which transitions into a hedgerow (WL1) comprised of elder (*Sambucus nigra*), hazel (*Corylus avellana*), hawthorn (*Crataegus monogyna*), blackthorn (*Prunus spinosa*), ash (*Fraxinus excelsior*) and buddleia (*Buddleja davidii*). A small section of scrub habitat (WS1) is present at the eastern end of the laneway. This small section of scrub is relatively sparse with young willow species (*Salix spp.*) and bramble (*Rubus fruticosus*) present and predominantly bare ground throughout the scrubland due to repeated cattle encroachment.

There is a mature treeline (WL2) between the western boundary of the field along Harristown lane and trees include hazel, ash and hawthorn. This treeline is outside the red line boundary of the proposed development.

A surface water feature (akin to a drainage ditch) crosses the centre of the site from west to east which is the beginning of the Santry River (FW2). A heavily poached area of grass beside the watercourse indicates its use as a water source for cattle. Along the eastern side of the watercourse is a predominantly bramble hedgerow with young hawthorn present. Further east along the watercourse there are occasional semi-mature hawthorn and ash trees. The main channel of the watercourse is mostly overgrown along its length with bramble, dog rose (*Rosa candida*), bittersweet (*Solanum dulcamara*), vetch (*Vicia spp.*), nettle (*Urtica dioica*) and willow herb (*Epilobium angustifolium*) noted. Occasional areas of Juncus grass (*Juncus effusus*) are found within the grassland areas near the watercourse bisecting the proposed development site.

There is an area of deciduous woodland (WD1) in the north west corner of the site comprised of ash, sycamore (*Acer pseudoplatanus*), hawthorn and willow which lies outside the redline boundary of the proposed development site. Some of the ash trees displayed signs of ash die-back disease (2022). Within this woodland there is a derelict house (BL3) with dilapidated wooden kennels to the rear of the house. There is a small brick shed to the south east of the house on the northern side of the watercourse.

The southern boundary of the site is a metal security fence with immature native hedgerow species planted on the southern side of the fence, species include birch (*Betula Pendula*), oak (*Quercus spp.*), elder, hawthorn. There is a single mature willow tree on the northern side of the southern boundary fence close to the south western corner of the site.

The eastern boundary is marked with a metal security fence along the western side of a private road leading from the R108 to Horizon Logistics Park. The borders of the roadway are comprised of mown grass verges (GA2) and standard sized landscape feature lime trees (*Tilia spp.*).

Figure 4-3 below illustrates the predominant habitats found within the proposed development site.

4.3. Bird Species – Documented Records and Site Survey Evidence

4.3.1.1. Documented Rare and Protected Flora and Fauna

This section of the report outlines bird species that have been previously recorded within and around the proposed development site. NBDC datasets of rare and protected species records⁵ for the OSI 1km grid square; O1342, which covers/encompasses the entire proposed development site, were examined to provide a detailed account of bird species previously recorded within the proposed development site within the last 10 years (2013-2023). NBDC species records for the wider area were also reviewed.

This section also details sightings of birds noted during site surveys undertaken on 17th & 18th June 2022 and 1st August 2023. In addition, as part of the Dublin Airport Infrastructure Application (Planning Ref; F23A/0781) field surveys were conducted between 2018-2023 to establish the non-breeding and breeding bird assemblage at the Dublin Airport and within the wider Zol of the airport lands, and to identify areas of importance to bird species. The proposed development site lies within the bird survey area and species sightings are detailed below.

Birds

The proposed development is in an agricultural field. Within the OSI 1km grid square O1342, there is 1 no. sighting of bird species; Buzzard (*Buteo buteo*) within NBDC datasets recorded in 2021.

Site surveys undertaken in 2022 and 2023 for the proposed development noted; buzzard, mistle thrush (pair) (*Turdus viscivorus*), starlings (*Sturnus vulgaris*), wren (*Troglodytes troglodytes*), blackcap (*Sylvia atricapilla*), blackbird (2 pairs) (*Turdus merula*), dunnoek (*Prunella modularis*) and magpie (*Pica pica*). A remnant Blackbird/thrush nest was recorded in the brick shed south of the derelict house.

Bird surveys undertaken as part of the daa Infrastructure Application noted a flock of starlings, 2 no. doves (*Columba oenas*) and herring gulls (*Larus argentatus*) within the vicinity off (outside) the proposed development site.

⁵ <https://maps.biodiversityireland.ie/Map>



Figure 4-3 - Predominant habitats found within the proposed development site.

5. Connectivity to Natura 2000 Sites

5.1. Zone of Influence

The "Zone of Influence" of a plan or project is the area which may experience ecological effects as a result of its implementation, including any ancillary activities. The various impacts of a plan or project will each have their own characteristics, e.g. nature, extent, magnitude, duration etc. Accordingly, the area subject to each impact ("zone of impact") will vary depending on characteristics of the impact and the presence of pathways for its propagation. Ecological features within or connected to one or more zones of impact could, depending on their sensitivities, be affected by the plan or project under consideration. The area containing such features may be regarded as the Zone of Influence. As such, in establishing the Zone of Influence for a plan or project, regard must be had to the characteristics of its potential impacts, potential pathways for impacts and the sensitivities of ecological features in the receiving environment.

In its guidance on selecting which Natura 2000 sites to include in the AA Screening, *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (DEHLG, 2010a) recommends inclusion of sites in the following three categories: -

- Any Natura 2000 sites within or adjacent to the plan or project area,
- Any Natura 2000 sites within the Zone of Influence of the plan or project (generally within 15 km for plans, to be established on a case-by-case basis for projects, having regard to the nature, scale and location of the project, the sensitivities of the ecological receptors and the potential for in-combination effects), and
- Following the precautionary principle, any other Natura 2000 sites for which the possibility of significant effects cannot be excluded, e.g. for a project with hydrological impacts, it may be necessary to check the full extent of the catchment for Natura 2000 sites with water-dependent qualifying interests.

In addition, *Assessment of plans and projects in relation to Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC* (EC, 2021) recommends consideration of Natura 2000 sites hosting fauna which could move to the project area or its zone(s) of impact, and the potential for the project to sever ecological connectivity within or between Natura 2000 sites. *Appropriate Assessment Screening for Development Management* (OPR, 2021) emphasises the importance of employing the source-pathway-receptor model (rather than arbitrary distances such as 15km) when selecting Natura 2000 sites for inclusion in the AA Screening.

The proposed development does not lie within any European site nor is it adjacent to any European site.

The zone of influence of the proposed development includes those European sites with potential indirect connectivity through the following pathways: -

- Hydrological – effects from surface water quality; or,
- Hydrogeological – effects from groundwater.

Consideration has also been given to species which may occur at a distance from the SAC or SPA for which they are a Qualifying Interest (QI). Many SPA water bird species have a wide geographical range, therefore, the mobility of QI waterbird species and their potential to range outside of the delineated boundaries of their respective European sites has also been considered as part of this assessment.

There are 18 no. European sites within the potential zone of influence (Zoi) of the proposed development; 9 no. SACs and 9 no. SPAs, as outlined in Table 5.1 and 5.2 below. There is hydrological connection through the surface water pathway of the Santry River between the proposed development site and North Dublin Bay SAC (000206) and the North Bull Island SPA (004006).

Table 5.1 and 5.2 details the European sites which are within the potential Zoi of the proposed development, which lists their associated qualifying interests and specifies if there is connectivity to the European site from the proposed development or not.

Due to potential hydrological connectivity from the proposed development site to North Dublin Bay, the following European sites are subject to further assessment below; North Dublin Bay SAC and North Bull Island SPA.

Figures 5-1 and 5-2 depict the locations of the European Sites within the potential Zoi of the proposed development.

Table 5-1 - Special Areas of Conservation within potential Zol of the proposed development.

Site Name and Code	Approximate Distance from development location	Features of Interest	Connectivity between the proposed development and this European site
North Dublin Bay SAC (000206) ⁶	9.7km direct line distance, 10.9km distance downstream via watercourses.	<ul style="list-style-type: none"> 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] 	<p>Yes</p> <p>The Santry River is within the proposed development site which flows to North Dublin Bay thereby providing hydrological connectivity between the proposed development site and this SAC.</p> <p>This site is discussed further below.</p>
Baldoyle Bay SAC (000199) ⁷	9.8km direct line distance.	<ul style="list-style-type: none"> Mudflats and sandflats not covered by seawater at low tide [1140] 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] 	<p>No connectivity.</p> <p>There is no direct overlap between the proposed development site and Baldoyle Bay SAC.</p> <p>Surface waters from the proposed development site flow to North Dublin Bay and not to Baldoyle Bay. There is no indirect connectivity between the proposed development site and this SAC via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The location, scale and duration of the proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats or species.</p>

⁶ NPWS (2013). *Conservation Objectives: North Dublin Bay SAC 000206. Version 1.* National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

⁷ NPWS (2012). *Conservation Objectives: Baldoyle Bay SAC 000199. Version 1.0.* National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Connectivity between the proposed development and this European site
			This site is not considered further.
Malahide Estuary SAC (000205) ⁸	7.6km direct line distance	<ul style="list-style-type: none"> Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] 	<p>No connectivity.</p> <p>There is no direct overlap between the proposed development site and Malahide Estuary SAC.</p> <p>Surface waters from the proposed development site flow to North Dublin Bay and not to Malahide Estuary. There is no indirect connectivity between the development site and this SAC via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats.</p> <p>This site is not considered further.</p>
Rogerstown Estuary SAC (000208) ⁹	10.9km direct line distance	<ul style="list-style-type: none"> Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] 	<p>No connectivity.</p> <p>There is no direct overlap between the proposed development site and Rogerstown Estuary SAC.</p> <p>Surface waters from the proposed development site flow to North Dublin Bay and not to Rogerstown Estuary. There is no indirect connectivity between the development site and this SAC via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats.</p> <p>This site is not considered further.</p>
South Dublin Bay SAC	10.6km direct line distance	<ul style="list-style-type: none"> Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] 	<p>No connectivity.</p> <p>There is no direct overlap between the proposed development site and South Dublin Bay SAC.</p>

⁸ NPWS (2013). *Conservation Objectives: Malahide Estuary SAC 000205. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

⁹ NPWS (2013). *Conservation Objectives: Rogerstown Estuary SAC 000208. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Connectivity between the proposed development and this European site
(000210) ¹⁰		<ul style="list-style-type: none"> Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110] 	<p>Surface waters from the proposed development site flow ca. 10.9km to North Dublin Bay and not to South Dublin Bay. The Santry River discharges to North Dublin Bay to the north of the solid Causeway to Bull Island. Given the expanse of coastal waters between North Dublin Bay SAC and South Dublin Bay SAC, there is no viable hydrological connectivity through which South Dublin Bay SAC could be effected from a deterioration in water quality in the Santry River.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats.</p> <p>This site is not considered further.</p>
Rye Water Valley/Cartron SAC (001398) ¹¹	14.4km direct line distance	<ul style="list-style-type: none"> Petrifying springs with tufa formation (Cratoneurion)* [7220] Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>) [1014] Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>) [1016] 	<p>No connectivity.</p> <p>There is no direct overlap between the proposed development site and Rye Water Valley/Cartron SAC. The Rye Water Valley site is located in the catchment of the Liffey upstream of Dublin.</p> <p>There is no indirect connectivity between the proposed development site and this SAC via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats and species for which the SAC has been designated and do not have the potential to affect the conservation objectives of QI snails or petrifying springs.</p> <p>This site is not considered further.</p>
Rockabill to Dalkey Island SAC (003000) ¹²	14.5km direct line distance	<ul style="list-style-type: none"> Reefs [1170] <i>Phocoena phocoena</i> (Harbour Porpoise) [1351] 	<p>No connectivity.</p> <p>This SAC is marine in nature. Located offshore this SAC is designated for both offshore reef habitat and Harbour Porpoise.</p> <p>The Santry River discharges to North Dublin Bay to the north of the Causeway to Bull Island. There is no direct or viable hydrological</p>

¹⁰ NPWS (2013). *Conservation Objectives: South Dublin Bay SAC 000210. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

¹¹ NPWS (2021). *Conservation Objectives: Rye Water Valley/Cartron SAC 001398. Version 1*. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

¹² NPWS (2013). *Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Connectivity between the proposed development and this European site
			<p>connection between the proposed development site and this offshore marine SAC.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats and species for which the SAC has been designated and do not have the potential to affect the conservation objectives of reefs or porpoise.</p> <p>This site is not considered further.</p>
Ireland's Eye SAC (002193) ¹³	14.7km direct line distance	<ul style="list-style-type: none"> Perennial vegetation of stony banks [1220] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] 	<p>No connectivity.</p> <p>This SAC is within the Irish Sea.</p> <p>The Santry River discharges to North Dublin Bay to the north of the Causeway to Bull Island. There is no direct or viable hydrological connection between the proposed development site and this offshore marine SAC.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats.</p> <p>This site is not considered further.</p>
Howth Head SAC (000202) ¹⁴	13.8km direct line distance	<ul style="list-style-type: none"> Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030] 	<p>No connectivity.</p> <p>There is no direct overlap between the proposed development site and Howth Head SAC. Howth Head SAC is designated for terrestrial habitats which cannot be affected via hydrological pathways.</p> <p>The Santry River discharges to North Dublin Bay to the north of the Causeway to Bull Island. There is no direct or viable hydrological connection between the proposed development site that would impact on either sea cliffs or dry heath recorded on Howth Head.</p> <p>The location, scale and duration of proposed development is such that they will not contribute to direct, indirect or in-combination impacts on habitats for which the SAC has been designated and do not have the potential to affect the conservation objectives of these habitats.</p> <p>This site is not considered further.</p>

¹³ NPWS (2017). *Conservation Objectives: Ireland's Eye SAC 002193. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

¹⁴ NPWS (2016). *Conservation Objectives: Howth Head SAC 000202. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

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Table 5-2 - Special Protection Areas for birds within potential Zol of the proposed development.

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the Zol
North Bull Island SPA (004006) ¹⁵	9.7km direct line distance, 10.9km downstream distance via watercourses	<ul style="list-style-type: none"> • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] • Shelduck (<i>Tadorna tadorna</i>) [A048] • Teal (<i>Anas crecca</i>) [A052] • Pintail (<i>Anas acuta</i>) [A054] • Shoveler (<i>Anas clypeata</i>) [A056] • Oystercatcher (<i>Haematopus ostralegus</i>) [A130] • Golden Plover (<i>Pluvialis apricaria</i>) [A140] • Grey Plover (<i>Pluvialis squatarola</i>) [A141] • Knot (<i>Calidris canutus</i>) [A143] • Sanderling (<i>Calidris alba</i>) [A144] • Dunlin (<i>Calidris alpina</i>) [A149] • Black-tailed Godwit (<i>Limosa limosa</i>) [A156] • Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] • Curlew (<i>Numenius arquata</i>) [A160] • Redshank (<i>Tringa totanus</i>) [A162] • Turnstone (<i>Arenaria interpres</i>) [A169] • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] • Wetland and Waterbirds [A999] 	<p>Yes</p> <p>North Bull Island SPA is designated for a range of wintering waders and wildfowl that frequent coastal estuaries.</p> <p>There is no direct overlap between the proposed works and the SPA. The proposed development is sufficiently remote that there is no risk of disturbance to waders and wildfowl using the SPA.</p> <p>While a number of these species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any Qualifying Interest (QI) waterbirds within the proposed development site. An ongoing programme of restricting bird access within the airport lands further limits the potential for bird species to access the development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The SPA is hydrologically connected to the proposed development via Santry River.</p> <p>Due to the hydrological connectivity of the works with the SPA, there is the potential for indirect impacts on wetland habitats through the potential degradation of water quality in the Santry River and North Dublin Bay. Therefore, in the absence of mitigation measures, impacts to qualifying interest wetland habitats in this SPA cannot be entirely ruled out.</p> <p>This SPA is discussed further below.</p>
Baldoyle Bay SPA (004016) ¹⁶	9.8km direct line distance.	<ul style="list-style-type: none"> • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] • Shelduck (<i>Tadorna tadorna</i>) [A048] • Ringed Plover (<i>Charadrius hiaticula</i>) [A137] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development</p>

¹⁵ NPWS (2015). *Conservation Objectives: North Bull Island SPA 004006. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

¹⁶ NPWS (2013). *Conservation Objectives: Baldoyle Bay SPA 004016. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the ZOI
		<ul style="list-style-type: none"> Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wetland and Waterbirds [A999] 	<p>site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern. The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>
Malahide Estuary SPA (004026) ¹⁷	7.6km direct line distance	<ul style="list-style-type: none"> Great Crested Grebe (<i>Podiceps cristatus</i>) [A005] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Pintail (<i>Anas acuta</i>) [A054] Goldeneye (<i>Bucephala clangula</i>) [A067] Red-breasted Merganser (<i>Mergus serrator</i>) [A069] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that</p>

¹⁷ NPWS (2013). *Conservation Objectives: Malahide Estuary SPA 004025. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the Zol
		<ul style="list-style-type: none"> • Grey Plover (<i>Pluvialis squatarola</i>) [A141] • Knot (<i>Calidris canutus</i>) [A143] • Dunlin (<i>Calidris alpina</i>) [A149] • Black-tailed Godwit (<i>Limosa limosa</i>) [A156] • Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] • Redshank (<i>Tringa totanus</i>) [A162] • Wetland and Waterbirds [A999] 	<p>would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern. The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>
Rogerstown Estuary SPA (004015) ¹⁸	11.4km direct line distance	<ul style="list-style-type: none"> • Greylag Goose (<i>Anser anser</i>) [A043] • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] • Shelduck (<i>Tadorna tadorna</i>) [A048] • Shoveler (<i>Anas clypeata</i>) [A056] • 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] • Dunlin (<i>Calidris alpina</i>) [A149] • Black-tailed Godwit (<i>Limosa limosa</i>) [A156] • Redshank (<i>Tringa totanus</i>) [A162] • Wetland and Waterbirds [A999] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern.</p>

¹⁸ NPWS (2013). *Conservation Objectives: Rogerstown Estuary SPA 004015. Version 1*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the ZOI
			<p>The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>
South Dublin Bay and River Tolka SPA (004024) ¹⁹	7.8km direct line distance	<ul style="list-style-type: none"> • 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] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern. The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which</p>

¹⁹ NPWS (2015). *Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1.* National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the Zol
			the SPA has been designated and do not have the potential to affect the conservation objectives of these species. This site is not considered further.
North-West Irish Sea SPA (004236) ²⁰	12.4km	<ul style="list-style-type: none"> Red-throated Diver (<i>Gavia stellata</i>) [A001] Great Northern Diver (<i>Gavia immer</i>) [A003] Fulmar (<i>Fulmarus glacialis</i>) [A009] Manx Shearwater (<i>Puffinus puffinus</i>) [A013] Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Common Scoter (<i>Melanitta nigra</i>) [A065] Little Gull (<i>Larus minutus</i>) [A177] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Common Gull (<i>Larus canus</i>) [A182] Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] Herring Gull (<i>Larus argentatus</i>) [A184] Great Black-backed Gull (<i>Larus marinus</i>) [A187] Kittiwake (<i>Rissa tridactyla</i>) [A188] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Little Tern (<i>Sterna albifrons</i>) [A195] Guillemot (<i>Uria aalge</i>) [A199] Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern. The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>
Ireland's Eye SPA	14.5km direct line distance	<ul style="list-style-type: none"> Cormorant (<i>Phalacrocorax carbo</i>) [A017] Herring Gull (<i>Larus argentatus</i>) [A184] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development</p>

²⁰ NPWS (2023) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the ZOI
(004117) ²¹		<ul style="list-style-type: none"> Kittiwake (<i>Rissa tridactyla</i>) [A188] Guillemot (<i>Uria aalge</i>) [A199] Razorbill (<i>Alca torda</i>) [A200] 	<p>site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern. The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>
Howth Head SPA (004113) ²²	16.3km direct line distance	<ul style="list-style-type: none"> Kittiwake (<i>Rissa tridactyla</i>) [A188] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to Kittiwake, such as displacement or disturbance from foraging or roosting areas, will not occur.</p>

²¹ NPWS (2022). *Conservation objectives for Ireland's Eye SPA [004117]. Generic Version 9.0.* Department of Housing, Local Government and Heritage.

²² NPWS (2022) *Conservation objectives for Howth Head Coast SPA [004113]. First Order Site specific Conservation Objectives Version 1.0.* Department of Housing, Local Government and Heritage

Site Name and Code	Approximate Distance from development location	Features of Interest	Within the ZOI
			<p>Kittiwake will not range inland to use the proposed development site. As such there is no potential for ex-situ disturbance or displacement impacts.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on the bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of Kittiwakes.</p> <p>This site is not considered further.</p>
Lambay Island SPA (004069)	19km direct line distance	<ul style="list-style-type: none"> Fulmar (<i>Fulmarus glacialis</i>) [A009] Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Greylag Goose (<i>Anser anser</i>) [A043] Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] Herring Gull (<i>Larus argentatus</i>) [A184] Kittiwake (<i>Rissa tridactyla</i>) [A188] Guillemot (<i>Uria aalge</i>) [A199] Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204] 	<p>No connectivity</p> <p>There is no direct overlap between the proposed development site and this SPA. There is no indirect connectivity between the proposed development site and this SPA via watercourses, drains, ditches, groundwater or any other vectors.</p> <p>The proposed development site is sufficiently remote from the SPA that indirect impacts to bird species, such as displacement or disturbance from foraging or roosting areas, will not occur.</p> <p>While a number of these QI species do feed in fields in the wider landscape (i.e. away from the SPA), the airport lands do not support habitats that would be used by such field feeding species, or indeed coastal habitats that would be used by species for which this SPA is designated. In addition, ecological surveys undertaken within and around the proposed development site did not record any QI waterbirds within the proposed development site.</p> <p>Furthermore, the proposed development site is located close to the south western extent of the runway where risk of bird strike would be of concern. The ongoing programme of restricting bird access close to the flight areas of the airport further limits the potential for bird species to access the proposed development site. Given the lack of usage of the proposed development site by QI waterbirds, impacts such as the disturbance and displacement of ex-situ waterbirds will not occur.</p> <p>The location, scale and operation of the proposed development is such that they will not contribute to direct or indirect impacts on bird species for which the SPA has been designated and do not have the potential to affect the conservation objectives of these species.</p> <p>This site is not considered further.</p>

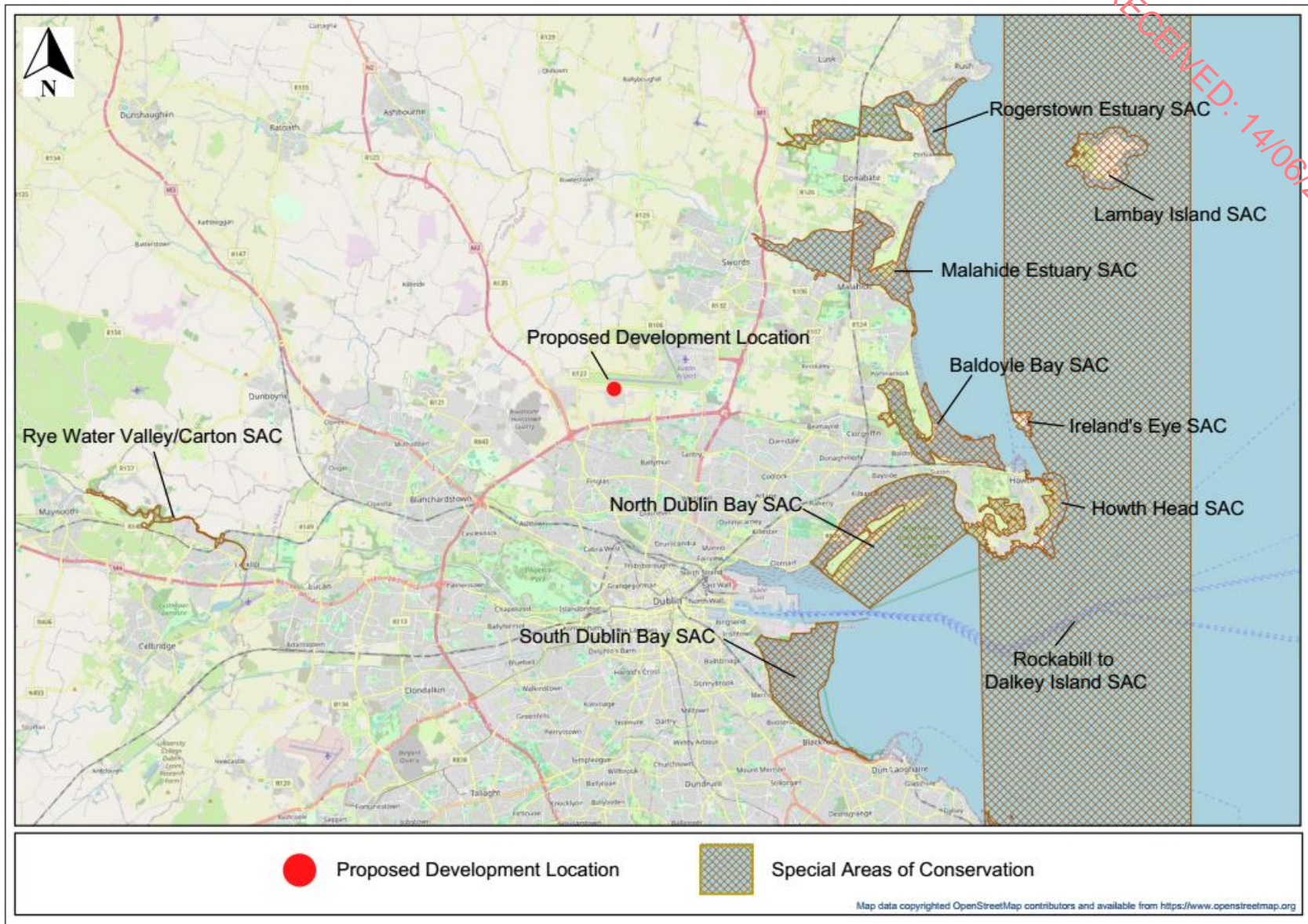


Figure 5-1 - SACs within the Potential Zone of Interest of the Proposed Development.

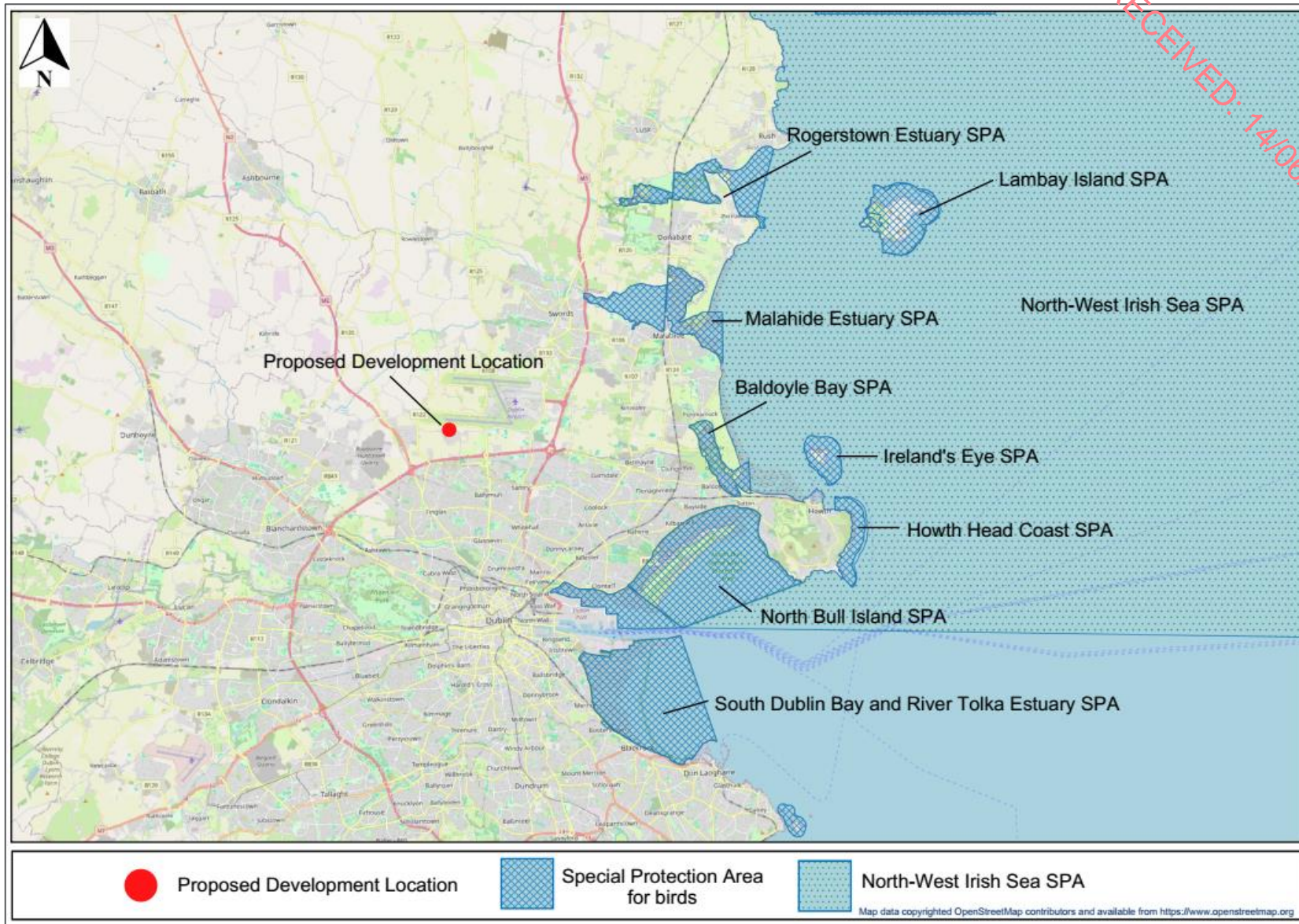


Figure 5-2 - SPAs within the Potential Zone of Interest of the Proposed Development

5.2. Summary of Screening

5.2.1. Screening of SACs

The proposed development site does not lie within any SAC. There is 1 no. SAC which has indirect connectivity from the proposed development site via the hydrological pathway of the Santry River, namely: -

- North Dublin Bay SAC

Whilst the risk of impacts to this SAC via these hydrological pathways is considered to be low, following a precautionary approach, in the absence of mitigation measures likely significant effects on this SAC cannot be entirely ruled out at Stage 1 Screening. Therefore North Dublin SAC will proceed to more detailed consideration and full Stage 2 Appropriate Assessment (see Section 6).

There are a further 8 no. Special Areas of Conservation located within the potential Zol of the proposed development. However, there is no physical overlap between the development and any of these sites. Nor is there any indirect connectivity via watercourses, groundwater, drains, ditches or any other vectors. Given the lack of any potential connecting pathways between the proposed development site and these 8 no. SACs, there are no potential direct, indirect or in-combination impacts. These sites are as follows: -

- Baldoyle Bay SAC
- Malahide Estuary SAC
- Rogerstown Estuary SAC
- South Dublin Bay SAC
- Rye Water Valley/Carlton SAC
- Rockabill to Dalkey Island SAC
- Ireland's Eye SAC
- Howth Head SAC

The above eight sites are therefore Screened Out at Stage 1 and will not be considered further.

5.2.2. Screening of SPAs

The proposed development site does not lie within any SPA. There is 1 no. SPA which has potential indirect connectivity to the proposed development site via the hydrological pathways of the Santry River, namely: -

- North Bull Island SPA

As this SPA is located downstream of the proposed scheme, in the absence of mitigation measures, the risk of likely significant effects on the Qualifying Interest Wetland Habitats cannot be ruled out at Stage 1 Screening, so North Bull Island SPA will proceed to more detailed consideration and full Stage 2 Appropriate Assessment (see Section 6).

There are 8 no. other SPAs within the potential Zol of the proposed development, namely: -

- Baldoyle Bay SPA
- Malahide Estuary SPA
- South Dublin Bay and River Tolka SPA
- Rogerstown Estuary SPA
- Ireland's Eye SPA
- North-West Irish Sea SPA
- Howth Head Coast SPA
- Lambay Island SPA

As detailed in Table 5.2 above, the proposed development site does not provide suitable habitat for any of the birds of Special Conservation Interest of these SPAs. As such, there is no potential for ex-situ impacts on these species. Furthermore, given the lack of connectivity and distance between the proposed development and these SPAs, there is no risk of any direct or indirect impacts on the habitats at these sites. Therefore, the possibility of any effects on this SPAs from the proposed development, either alone or in combination with other plans or projects, can be excluded at this stage.

The above eight sites are therefore Screened Out at Stage 1 and will not be considered further.

6. Appropriate Assessment

This section of the report provides information on North Dublin Bay SAC and North Bull Island SPA and assesses the SAC and SPA in more detail and examines where likely significant effects may arise. Where these effects are identified that may affect the integrity of the SAC and SPA, avoidance and mitigation measures are proposed to mitigate these effects.

6.1. Impact Assessment - North Dublin Bay SAC

A description of the North Dublin Bay SAC taken from the supporting information available on the NPWS website²³ is summarised below.

"North Bull Island is a sandy spit which formed after the building of the South Wall and Bull Wall in the 18th and 19th centuries. It now extends for about 5 km in length and is up to 1 km wide in places. A well-developed and dynamic dune system stretches along the seaward side of the island. Various types of dunes occur, from fixed dune grassland to pioneer communities on foredunes. Marram Grass (*Ammophila arenaria*) is dominant on the outer dune ridges, with Lyme-grass (*Leymus arenarius*) and Sand Couch (*Elymus farctus*) on the foredunes. Behind the first dune ridge, plant diversity increases with the appearance of such species as Wild Pansy (*Viola tricolor*), Kidney Vetch (*Anthyllis vulneraria*), Common Bird's-foot-trefoil (*Lotus corniculatus*), Common Restharrow (*Ononis repens*), Yellow-rattle (*Rhinanthus minor*) and Pyramidal Orchid (*Anacamptis pyramidalis*). In these grassy areas and slacks, the scarce Bee Orchid (*Ophrys apifera*) occurs.

About 1 km from the tip of the island, a large dune slack with a rich flora occurs, usually referred to as the 'Alder Marsh' because of the presence of Alder trees (*Alnus glutinosa*). The water table is very near the surface and is only slightly brackish. Saltmarsh Rush (*Juncus maritimus*) is the dominant species, with Meadowsweet (*Filipendula ulmaria*) and Devil's-bit Scabious (*Succisa pratensis*) being frequent. The orchid flora is notable and includes Marsh Helleborine (*Epipactis palustris*), Common Twayblade (*Listera ovata*), Autumn Lady's-tresses (*Spiranthes spiralis*) and Marsh Orchids (*Dactylorhiza* spp.)

Saltmarsh extends along the length of the landward side of the island. The edge of the marsh is marked by an eroding edge which varies from 20 cm to 60 cm high. The marsh can be zoned into different levels according to the vegetation types present. On the lower marsh, Glasswort (*Salicornia europaea*), Common Saltmarsh-grass (*Puccinellia maritima*), Annual Sea-blite (*Suaeda maritima*) and Greater Sea-spurrey (*Spergularia media*) are the main species. Higher up in the middle marsh Sea Plantain (*Plantago maritima*), Sea Aster (*Aster tripolium*), Sea Arrowgrass (*Triglochin maritima*) and Thrift (*Armeria maritima*) appear. Above the mark of the normal high tide, species such as Common Scurvygrass (*Cochlearia officinalis*) and Sea Milkwort (*Glaux maritima*) are found, while on the extreme upper marsh, the rushes *Juncus maritimus* and *J. gerardi* are dominant. Towards the tip of the island, the saltmarsh grades naturally into fixed dune vegetation.

The habitat 'annual vegetation of drift lines' is found in places, along the length of Dollymount Strand, with species such as Sea Rocket (*Cakile maritima*), Oraches (*Atriplex* spp.) and Prickly Saltwort (*Salsola kali*). The island shelters two intertidal lagoons which are divided by a solid causeway. The sediments of the lagoons are mainly sands with a small and varying mixture of silt and clay. The north lagoon has an area known as the "Salicornia flat", which is dominated by *Salicornia dolichostachya*, a pioneer glasswort species, and covers about 25 ha. Beaked Tasselweed (*Ruppia maritima*) occurs in this area, along with some Narrow-leaved Eelgrass (*Zostera angustifolia*). Dwarf Eelgrass (*Z. noltii*) also occurs in Sutton Creek. Common Cordgrass (*Spartina anglica*) occurs in places but its growth is controlled by management. Green algal mats (*Enteromorpha* spp., *Ulva lactuca*) cover large areas of the flats during summer. These sediments have a rich macrofauna, with high densities of Lugworms (*Arenicola marina*) in parts of the north lagoon. Mussels (*Mytilus edulis*) occur in places, along with bivalves such as *Cerastoderma edule*, *Macoma balthica* and *Scrobicularia plana*. The small gastropod *Hydrobia ulvae* occurs in high densities in places, while the crustaceans *Corophium volutator* and *Carcinus maenas* are common. The sediments on the seaward side of North Bull Island are mostly sands. The site extends below the low spring tide mark to include an area of the sublittoral zone. Three rare plant species which are legally protected under the Flora (Protection) Order, 1999 have been recorded on the North Bull Island. These are Lesser Centaury (*Centaureum pulchellum*), Red Hemp-nettle (*Galeopsis angustifolia*) and Meadow Saxifrage (*Saxifraga granulata*). Two further species listed as threatened in the Red Data Book, Wild Clary/Sage (*Salvia verbenaca*) and Spring Vetch (*Vicia lathyroides*), have also been recorded. A rare liverwort, *Petalophyllum ralfsii*, was first recorded from the North Bull Island in 1874

²³ <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY000206.pdf>

and has recently been confirmed as still present. This species is of high conservation value as it is listed on Annex II of the E.U. Habitats Directive. The North Bull is the only known extant site for the species in Ireland away from the western seaboard.”

6.1.1. Conservation Objectives

The conservation objectives for the North Dublin Bay SAC (000206) and the list of specific attributes and targets defining the conservation objectives for each feature of interest can be found at (last accessed on 24th January 2024): https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000206.pdf

These were reviewed and considered when preparing this report. The conservation objectives can be broadly summarized as follows: -

- To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in North Dublin Bay SAC
- To restore the favourable conservation condition of Annual vegetation of drift lines in North Dublin Bay SAC
- To restore the favourable conservation condition of Salicornia and other annuals colonizing mud and sand in North Dublin Bay SAC
- To maintain the favourable conservation condition of Atlantic salt meadows (*GlaucoPuccinellietalia maritimae*) in North Dublin Bay SAC
- To maintain the favourable conservation condition of Mediterranean salt meadows (*Juncetalia maritimi*) in North Dublin Bay SAC
- To restore the favourable conservation condition of Embryonic shifting dunes in North Dublin Bay SAC
- To restore the favourable conservation condition of Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes') in North Dublin Bay SAC
- To restore the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation ('grey dunes') in North Dublin Bay SAC
- To restore the favourable conservation condition of Humid dune slacks in North Dublin Bay SAC
- To maintain the favourable conservation condition of Petalwort in North Dublin Bay SAC

6.1.2. Potential Threats

The threats, pressures and activities with impacts on the SAC²⁴ are listed below in Table 5.3 below.

Table 6-1 - Threats, Pressures and activities with impacts on North Dublin Bay SAC.

Rank	Threats & pressures (Code)	Threats and pressures	inside/outside/both [i o b]
H	E01	Urbanised areas, human habitation	o
H	E02	Industrial or commercial areas	o
H	E03	Discharges	i
H	G01.02	Walking, horse-riding and non-motorised vehicles	i
H	K03.06	Antagonism with domestic animals	i
L	F02.03	Leisure fishing	i
L	G05.05	Intensive maintenance of public parcs /cleaning of beaches	i
M	A04	Grazing	i
M	F02.03.01	Bait digging / collection	i
M	G01.01	Nautical sports	i
M	G02.01	Golf course	o
M	H01.03	Other point source pollution to surface water	i

²⁴ <https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=IE0000206>

Rank	Threats & pressures (Code)	Threats and pressures	inside/outside/both [i o b]
M	H01.09	Diffuse pollution to surface waters due to other sources not listed	i
M	I01	Invasive non-native species	i
M	J01.01	Burning down	i

Rank: H - High, M - Medium, L – Low

6.1.3. Identification of potential impacts on North Dublin Bay SAC

In summary, the proposed development involves the setting up of site compound, site clearance, excavation to formation levels, installation of drainage infrastructure, construction of hardstanding areas, installation of culverts in the Santry River and the erection of a welfare building and security hut.

There is potential indirect connectivity to North Dublin Bay SAC from the project site through the following hydrological pathway; Santry River which outfalls into North Dublin Bay SAC.

Direct Impacts

The proposed development site does not lie within this SAC and there is no overlap of the proposed development site with this SAC.

Given the location, nature and scale of the car park project, there will be no direct impacts on the Qualifying Interests (QIs) of the SAC during the construction phase or when the car park is operational.

Indirect Impacts

A deterioration in the water quality within the Santry River, which has connectivity to the proposed development site, is identified as the potential impact which could adversely affect the SAC's QI habitats.

The key works activities identified which may affect water quality are identified during the construction phase and include; the in-stream works in the form of pre-cast culvert installation, the pouring of concrete path surfaces near the watercourse, excavated materials near the watercourse (silt laden surface water run-off); refuelling of plant/equipment near the watercourse (hydrocarbons) and accidental spillage of contaminating substances near the Santry River. However, given that normal construction methodologies will be applied during the construction phase, the potential for significant impacts to the Santry River from these sources is low and given the downstream distance to North Dublin Bay SAC no likely significant effects to the SAC are anticipated. However, following a highly precautionary approach, in the event standard construction methodologies are not applied, it is considered the potential for these aforementioned works activities to impact the surface water quality of Santry River cannot be entirely eliminated.

In order to mitigate potential adverse impacts on the surface water quality of the Santry River flowing through the proposed development site from construction related activities, surface water protection measures are proposed. Mitigation measures developed to mitigate potential construction related impacts on the Santry River are presented in Section 7 of this document.

During the operational phase of the proposed car park there is the potential for surface water / storm water run-off from the development site to be contaminated with hydrocarbons (e.g. from vehicles) or to a lesser degree to be contaminated with dirt and debris from hardstanding areas. It should be noted, however, that the potential for impacts to the downstream SAC from operational phase surface water drainage is negligible. Notwithstanding this, following precautionary principles, mitigation measures are proposed to eliminate potential impacts via this pathway.

In order to mitigate potential adverse impacts on the surface water quality of the Santry River during its operational phase, surface water protection measures have been included in the project design. The drainage design measures included with the project scope to protect surface water quality are presented in Section 7 of this document. With the implementation of the mitigation measures prescribed in section 7 there will be no effect on the integrity of North Dublin Bay SAC.

The TII guidance²⁵ also states that impacts to sensitive ecological receptors as a result of traffic emissions should be considered. Consideration should be given to designated conservation sites within 2km of the proposed development; however, a detailed assessment is only required at a local level, where there is a designated conservation site within 200m of impacted road links. North Dublin Bay SAC is not within 2km of the proposed

²⁵ Transport Infrastructure Ireland (2022) PE-ENV-01104: Climate Guidance for National Roads, Light Rail and Rural Cycleways (Offline & Greenways) – Overarching Technical Document.

development and therefore a detailed assessment of NO_x concentrations and nitrogen deposition has been screened out as there is no potential for significant impacts to North Dublin Bay SAC, or any other designated conservation sites, as a result of changes in local air quality.

6.2. Impact Assessment - North Bull Island SPA

A description of the North Bull Island SPA taken from the supporting information available on the NPWS website²⁶ is summarised and provided below.

"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 sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port during the 18th and 19th centuries. It is almost 5 km long and 1 km wide and runs parallel to the coast between Clontarf and Sutton. Part of the interior of the island has been converted to golf courses.

*Saltmarsh extends along the length of the landward side of the island and provides the main roost site for wintering birds in Dublin Bay. The island shelters two intertidal lagoons which are divided by a solid causeway. These lagoons provide the main feeding grounds for the wintering waterfowl. The sediments of the lagoons are mainly sands with a small and varying mixture of silt and clay. Green algal mats (*Ulva* spp.) are a feature of the flats during summer. These sediments have a rich macro-invertebrate fauna, with high densities of Lugworm (*Arenicola marina*) and Ragworm (*Hediste diversicolor*).*

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Light-bellied Brent Goose, Shelduck, Teal, Pintail, Shoveler, Oystercatcher, Golden Plover, Grey Plover, Knot, Sanderling, Dunlin, Black-tailed Godwit, Bar-tailed Godwit, Curlew, Redshank, Turnstone and Black-headed Gull. The site is also of special conservation interest for holding an assemblage of over 20,000 wintering waterbirds. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

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. Other species that occur regularly in winter include Grey Heron, Little Egret, Cormorant, Wigeon, Goldeneye, Red-breasted Merganser, Ringed Plover and Greenshank. Gulls are a feature of the site during winter and, along with the nationally important population of Black-headed Gull (2,196), other species that occur include Common Gull (332) and Herring Gull (331). While some of the birds also frequent South Dublin Bay and the River Tolka Estuary for feeding and/or roosting purposes, the majority remain within the site for much of the winter. The wintering bird populations have been monitored more or less continuously since the late 1960s and the site is now surveyed each winter as part of the larger Dublin Bay complex.

The North Bull Island SPA is a regular site for passage waders, especially Ruff, Curlew Sandpiper and Spotted Redshank. These are mostly observed in single figures in autumn but occasionally in spring or winter.

The site formerly had an important colony of Little Tern but breeding has not occurred in recent years. Several pairs of Ringed Plover breed, along with Shelduck in some years. Breeding passerines include Skylark, Meadow Pipit, Stonechat and Reed Bunting. The island is a regular wintering site for Short-eared Owl, with up to 5 present in some winters.

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"

²⁶ <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY004006.pdf>

6.2.1. Conservation Objectives

The Conservation Objectives for North Bull Island SPA are to maintain the favourable conservation condition of the bird species as Special Conservation Interests for this SPA.

The favourable conservation status of a species is achieved when:

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

The conservation objective for non-breeding birds of North Bull Island SPA are summarised below.

Objective 1: To maintain the favourable conservation condition of the non-breeding waterbird Special Conservation Interest species listed for North Bull Island SPA, which is defined by the following list of attributes and targets:			
Parameter	Attribute	Measure	Target
Population	Population Trend	Percentage change as per population trend assessment using waterbird count data collected through the Irish Wetland Bird Survey and other surveys	The long term population trend should be stable or increasing
Range	Distribution	Range, timing or intensity of use of areas used by waterbirds, as determined by regular low tide and other waterbird surveys	There should be no significant decrease in the range, timing or intensity of use of areas by the waterbird species of Special Conservation Interest other than that occurring from natural patterns of variation.
Objective 2: To maintain the favourable conservation condition of the wetland habitat at North Bull Island SPA as a resource for the regularly occurring migratory waterbirds that utilise it, which is defined by the following list of attributes and targets:			
Parameter	Attribute	Measure	Target
Area	Wetland habitat	Area (Ha)	The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 1,713 Ha, other than that occurring from natural patterns of variation.

The conservation objectives for the North Bull Island SPA (004006) and the list of specific attributes and targets defining the conservation objectives for each feature of interest can be found at (last accessed on 24th January 2024): https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004006.pdf

These were reviewed and considered when preparing this report. The conservation objectives can be broadly summarized as follows: -

- To maintain the favourable conservation condition of Light-bellied Brent Goose in North Bull Island SPA
- To maintain the favourable conservation condition of Shelduck in North Bull Island SPA
- To maintain the favourable conservation condition of Teal in North Bull Island SPA
- To maintain the favourable conservation condition of Pintail in North Bull Island SPA
- To maintain the favourable conservation condition of Shoveler in North Bull Island SPA
- To maintain the favourable conservation condition of Oystercatcher in North Bull Island SPA
- To maintain the favourable conservation condition of Golden Plover in North Bull Island SPA
- To maintain the favourable conservation condition of Grey Plover in North Bull Island SPA
- To maintain the favourable conservation condition of Knot in North Bull Island SPA
- To maintain the favourable conservation condition of Sanderling in North Bull Island SPA

- To maintain the favourable conservation condition of Dunlin in North Bull Island SPA
- To maintain the favourable conservation condition of Black-tailed Godwit in North Bull Island SPA
- To maintain the favourable conservation condition of Bar-tailed Godwit in North Bull Island SPA
- To maintain the favourable conservation condition of Curlew in North Bull Island SPA
- To maintain the favourable conservation condition of Redshank in North Bull Island SPA
- To maintain the favourable conservation condition of Turnstone in North Bull Island SPA
- To maintain the favourable conservation condition of Black-headed Gull in North Bull Island SPA
- To maintain the favourable conservation condition of the wetland habitat in North Bull Island SPA as a resource for the regularly occurring migratory waterbirds that utilise it

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6.2.2. Potential Threats

The threats, pressures and activities with impact on North Bull Island SPA ²⁷ are listed below.

Table 6-2 - Threats, pressures and activities with impacts on the North Bull Island SPA

Rank	Threats & pressures (Code)	Threats and pressures	inside/outside/both [i o b]
M	G01.01	Nautical sports	i
L	E01.04	Other patterns of habitation	i
M	F02.03.01	Bait digging / collection	i
M	D03.02	Shipping lanes	o
H	G01.02	Walking, horse-riding and non-motorised vehicles	i
M	E03	Discharges	o
M	E03	Discharges	i
M	D01.02	Roads, motorways	o
H	D01.05	Bridge, viaduct	i
M	G02.01	Golf course	i
M	E01.01	Continuous urbanisation	o
M	E02	Industrial or commercial areas	o

Rank: H - High, M - Medium, L – Low

6.2.3. Identification of potential impacts on Baldoyle Bay SPA

North Bull Island SPA is designated for a range of wintering waders and wildfowl that frequent coastal estuaries. Direct impacts on the species associated with the SPA are not anticipated as there is no direct overlap of the airport lands with the SPA and the proposed development site is sufficiently remote that there is no risk of disturbance to waders and wildfowl using the SPA.

The SPA bird species; Shelduck, Teal, Pintail, Shoveler, Knot, Sanderling, Dunlin, Grey Plover, Black-tailed Godwit, Bar-tailed Godwit, Redshank and Turnstone are known to forage and roost only within estuarine or coastal habitats and as such will not be impacted by the construction or operation of a car park ca. 9.7km from the coastal and estuarine areas of North Dublin Bay.

Certain bird species associated with the SPA, such as; Light-bellied Brent Geese, Oystercatcher, Curlew, Golden Plover and gulls do feed within the wider landscape in arable fields and grasslands and thus there is the potential for disturbance related impacts if they are foraging in the grasslands of the proposed development site or near the proposed development site. However, the proposed development site covers a relatively small area that does not provide habitats highly suitable for SPA field feeding species and site surveys did not identify the greenfield site as accommodating any of these species. It is further noted that, as part of the ongoing airport operations, a Wildlife Management Plan is in place which permits airport operators to disturb and prevent birds from flocking at or immediately adjacent to Dublin Airport in the interests of public safety. Therefore, flocks of birds, including SPA Special Conservation Interest species, are prevented from forming near the southern runway and proposed development site within the airport lands, thereby reducing the risk of bird strike from aircraft at the airport.

²⁷ <https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=IE0004006>

As such, significant impacts, such as long term or repeated disturbance to ex-situ SPA foraging birds, will not occur. It is considered that the location, scale and operation of the proposed development is such that the proposed development will not contribute to likely significant effects on ex-situ bird species of North Bull Island SPA.

North Bull Island SPA is also designated for the protection of wetland habitats which support waterbird species. As with North Dublin Bay SAC, there is potential for impacts on the wetland habitats (which would in turn affect QI bird species) should the project result in significant adverse effects to the water quality of the Santry River which provides connectivity from the development site to North Bull Island SPA wetland habitats. As noted above for North Dublin Bay SAC, there is potential for both the construction phase and operational phase of the proposed project to result in a contamination event affecting the surface water quality of the Santry River.

In order to mitigate potential adverse impacts on the surface water quality of the Santry River running through the proposed development site from construction or operational related activities, surface water mitigation and protection measures are proposed. Mitigation measures developed to mitigate potential construction and operational related impacts on Santry River are presented in Section 7 of this document. With the implementation of the mitigation measures prescribed in Section 7 there will be no effect on the integrity of the QI wetland habitats of North Bull Island SPA.

As detailed above for the North Dublin Bay SAC, there will be no impacts to North Bull Island SPA from potential airborne pollutants during the operational phase of the proposed development.

7. Mitigation Measures

7.1. Introduction

The European Commission Guidance (2021) details how mitigation is a central part of the Appropriate Assessment process. Avoidance or reduction of impacts at source is the preferred option and such a mitigation by avoidance strategy has been incorporated into the design of the proposed development.

This section of the report identifies mitigation measures that have been implemented during the design stage and which will be implemented during the construction and operational stages of the proposed development in order to reduce, minimise or remove the potential for negative impact from the proposed development. These mitigation measures will ensure that the European Sites and their relevant qualifying interests will not be adversely affected by the proposed development.

This section of the report lists the mitigation measures that will be implemented to ensure that adverse effects on the European Sites listed below are eliminated: -

- North Dublin Bay SAC
- North Bull Island SPA

Design mitigation measures and mitigation measures for the construction and operational phases have been identified and are detailed below.

7.2. Design Mitigation Measures

7.2.1.1. Surface water drainage

Stormwater management for the proposed development is designed to comply with the Greater Dublin Strategic Drainage Study (GDSDS) and CIRIA Design Report C753 'The SuDS Manual'. In addition, the storm drainage system has been designed in accordance with the key documents and standards as listed below;

- Fingal County Council Development Plan, 2017 - 2023
- Dublin Airport Local Area Plan, 2020
- Dublin Airport Sustainable Drainage Policy Document

Sustainable drainage (SuDS) is a key focus for the entire design of the development. Along with porous paving for parking areas, the design calls for the inclusion of filter drains, interceptors and underground attenuation.

Refer to drainage design details in the Engineering Report accompanying this report (Document Ref; 21081-ATK-SCS-01-XXX-RP-C-XXX-0002).

The surface water drainage infrastructure for the site will mimic the natural drainage catchments of the existing site. The proposed car park drainage system has been split into two catchments, a northern catchment and a southern catchment which are separated by the Santry River which intersects the centre of the proposed development site: -

- The Northern catchment will have SuDS porous surfacing parking bays that will comprise of porous asphalt. The stormwater runoff will discharge into the permeable surface prior to collection by filter drains. The filter drains allow for adequate drainage of the permeable granular stone material into the proposed carrier drainage network.
- The Southern catchment will have SuDS porous surfacing parking bays that will comprise of porous asphalt. The stormwater runoff will discharge into the permeable surface prior to collection by filter drains. The filter drains allow for adequate drainage of the permeable granular stone material into the proposed carrier drainage network.
- It should be noted that internal circulation roads within the car park areas will be constructed of non-permeable asphalt but will be graded such that stormwater runoff drains from the surface to the adjacent porous car-parking bays.
- The main car park access circulation road will have an impermeable Stone Mastic Asphalt (SMA) surface which will be drained via the use of traditional road gullies.
- A vortex flow control device will be located downstream of the proposed carrier drainage network limiting flows to a maximum discharge rate specified below. Prior to discharge into the Santry stream a bypass separator will ensure silts and oil is removed.

- Attenuation for both catchments is provided through the use of a proprietary modular geocellular structure with a maintenance/inspection tunnel for providing underground surface water attenuation storage and infiltration to manage storm water runoff.
- A petrol interceptor will be provided on each outfall from the site. Petrol interceptors work on the premise that some hydrocarbons such as petroleum and diesel float on the top of water. Class 1 bypass separators are proposed which enable the main collection chamber to be by-passed at times of heavy rainfall which prevents any collected oil from being flushed out. Class 1 bypass separators are designed to achieve a concentration of less than 5mg/l of oil. Kingspan Klargestor Class 1 Bypass Petrol Interceptors or equal approved will be used prior to the discharge points north and south of the Santry stream and will be NSBE010 and NSBP003 at the north and south catchments respectively.

Given the inclusion of the comprehensive pollution control measures within the surface water drainage design, no impacts are considered likely on the Santry River (the receiving watercourse) during the operational phase of the proposed car park.

7.3. Ecological Clerk of Works

An Ecological Clerk of Works (ECoW) will be appointed by the Contractor in advance of construction. All in-stream works carried out within the ecologically sensitive area of the Santry River will be supervised by a suitably qualified ECoW.

The ECoW will: -

- be a full member of a relevant environmental institute, such as the Chartered Institute of Ecology and Environmental Management (CIEEM), the Institute of Environmental Management, or equivalent; and
- have demonstrable experience with overseeing construction sites.

In the detailed CEMP, which the Contractor will be required to prepare and adhere to, the Contractor will provide all necessary method statements to the ECoW to demonstrate how mitigation measures within this EIAR will be implemented. Such method statements will include the installation and removal of silt control measures (silt fences).

The ECoW will be responsible for monitoring the Contractor, and (importantly) identifying to the Contractor any additional or refined mitigation measures (i.e. adaptive management measures required). The ECoW will concisely report the findings of monitoring, including any adaptive management measures recommended to the Contractor, and the effectiveness of same.

The ECoW will have the authority to ensure all mitigation measures are being implemented effectively and will have the authority to stop works activities if required.

The ECoW and Site Manager will deliver site induction and training to all construction personnel prior to commencement of construction activities. The Contractor will maintain a record of training completed.

The ECoW will monitor Met Éireann's weather forecast and will instruct the Contractor that works within the Santry River will not be permitted within 24hrs of Met Éireann issuing a yellow, orange or red weather warning.

The ECoW will monitor all construction works within the Santry River features which has connectivity to European sites.

The Contractor (following ECoW advice and recommendations) will be responsible for the implementation of mitigation measures. In the unlikely event that the implemented measures are not performing effectively, emergency measures will be put in place e.g. bunding or spill kits and all works will cease immediately. Such measures are included in an Emergency Response Plan (ERP) which is included in the submitted CEMP (AtkinsRéalis, 2024) which the Contractor will be required to adhere to. This will ensure that mitigation measures are responsive to unexpected issues that may arise on-site during the construction works.

7.4. Construction Stage Mitigation Measures

Mitigation measures for the construction phase have been prescribed at sensitive locations within the proposed development site. Construction phase surface water quality mitigation measures are proposed where there is indirect connectivity to downstream habitats within the SAC or SPA.

- The construction management of the site will take account of the recommendations of the Construction Industry Research and Information Association (CIRIA) guidelines 'Control of water pollution from construction sites. Guidance for consultants and contractors (C532)' and 'Groundwater control: design and practice (second edition) (C750)' and CIRIA 2023 'Environmental good practice on site guide (fifth edition) (C811)' to minimise as far as possible the risk of pollution.

- The Contractor will be responsible for ensuring that the existing drainage network along the Santry River will be suitably protected via. the use of physical barriers and signage located a maximum of 15m from river bank on either side of the Santry River.
- Under no circumstances, should any material be stored (including stockpiled soils / imported material, and any hazardous material such as fuels, oils, chemicals, and paints etc.) or the proposed site compound be located within the 15m buffer zone along the Santry River which is has been designed as a designated riparian zone.
- The Contractor will be required to implement a site-specific water run-off management plan to be documented within the Detailed Construction Environmental Management Plan (CEMP) which the Contractor will develop prior to commencing any onsite construction works (including any enabling works etc.).
- A dewatering plan will be designed by the Contractor as temporary works, including disposal of water to a suitably licenced [wastewater] disposal / recovery facility, and reviewed and approved by daa plc. prior to being fully implemented.
- The proposed development will necessitate the installation of 1 no. new culvert and the extension of 1 no. existing culvert within the Santry River. The following mitigation measures will be implemented for the in-stream works at each culvert location;
 - All in-stream works carried out within the Santry River will be supervised by a suitably qualified Ecological Clerk Of Works.
 - Works within the Santry River will not be permitted within 24hrs of Met Éireann issuing a yellow, orange or red weather warning.
 - Culvert installation works will only be undertaken after and during a period of dry weather when water levels are low.
 - Culverts will be pre-cast units with no concrete pouring works to be undertaken within the Santry River.
 - Only clean washed stone will be used for the foundation base of the culverts. All imported stone for use in the streambed will be clear of fines.
 - Temporary over pumping will be required to facilitate the installation of the culverts as such the works will be undertaken in dry river bed conditions.
 - Upstream of each culvert works area the watercourse will be temporarily impounded / dammed by use of sand bags (or similar).
 - A silt fence will also be installed across the watercourse channel immediately downstream of the sand bags / dam area.
 - A second silt fence will be installed across the watercourse channel downstream of each culvert works area.
 - The installation of the sand bag dam and associated silt fences will be installed under the supervision of the ECoW.
 - Flows from upstream of the temporary dam will be over pumped into a settlement tank (or tanks) with any suspended solids in the water allowed to fully settle before discharge to downstream of the culverts works area.
 - The waters in the settlement tank(s) will be visually inspected by the ECoW to ensure settlement is effective and discharge will only be permitted following adequate settlement of suspended solids.
 - Dams, silt fences and settlement tanks will be inspected by the ECoW throughout the instream, works to ensure they are functioning effectively.
 - Foundation stone and precast culvert installation will only commence once the watercourse is dry.
 - Following the installation of the culverts the sand bags and silt fences will be removed to allow flows through the new culverts.
 - Downstream surface water quality monitoring, at monitoring location SW-S-3, will continue as part of Dublin Airport's ongoing water quality monitoring programme.
- In order to prevent any potential surface water / groundwater impacts via. release of hydrocarbon / chemical contaminants the following standard measures will be implemented:
 - Fuels, lubricants, and hydraulic fluids for equipment used on the construction site, as well as any solvents, oils, and paints 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;

- Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the proposed development for disposal or re-cycling;
- A response procedure will be put in place to deal with any accidental pollution events. Any spillage of fuels, lubricants or hydraulic oils will be immediately contained, and the contaminated soil removed from the proposed development and properly disposed of in accordance with all relevant waste management legislation;
- All site vehicles used will be refuelled in bunded and adequately sealed and covered areas in the construction compound area.
- Strict supervision of contractors will be adhered to in order to ensure that all plant and equipment utilised on-site is in good working condition. Any equipment not meeting the required standard will not be permitted for use within the site. This will minimise the risk of groundwater becoming contaminated through site activity.
- All oil stored on site for construction vehicles will be kept in a locked and bunded area;
- Generators, pumps, and similar plant will be placed on drip-trays to prevent contamination;
- All site vehicles used will be refuelled in bunded areas;
- All temporary construction fuel tanks will also be located in a suitably bunded area and all tanks will be double skinned. Relevant Material Safety Data Sheets along with oil absorbent materials will be kept on site in close proximity to any fuel storage tanks or bowsers during proposed site development works; and,
- All fuel / oil deliveries to on-site oil storage tanks will be supervised, and records will be kept of delivery dates and volumes.
- In order to prevent any potential surface water / groundwater impacts via. release of cementitious materials the following measures will be implemented where poured concrete is being used on site;
 - The production, transport and placement of all cementitious materials will be strictly planned and supervised. Site batching/production of concrete will not be carried out on site and therefore these aspects will not pose a risk to the waterbodies present, namely any temporarily exposed perched water or the Santry River;
 - Shutters will be designed to prevent failure. Grout loss will be prevented from shuttered pours by ensuring that all joints between panels achieve a close fit or that they are sealed;
 - Any spillages will be cleaned up and disposed of correctly;
 - Where concrete is to be placed by means of a skip, the opening gate of the delivery chute will be securely fastened to prevent accidental opening;
 - Where possible, concrete skips, pumps and machine buckets will be prevented from slewing over water when placing concrete;
 - Mixer washings and excess concrete will not be discharged directly into the drainage network, or any drainage ditches, surface water bodies or exposed groundwater; and,
 - Surplus concrete will be returned to batch plant after completion of a pour.
- Foul drainage from site compounds will be directed to the existing wastewater network or will be contained and disposed of off-site in an appropriate manner and in accordance with the relevant statutory regulations.
- In the highly unlikely event that ground contamination is encountered beneath the site during the construction works, all works will cease. Advice will be sought from an experienced contaminated land specialist and a phased environmental risk assessment (specifically to assess any associated potential environmental and/or human health risks) will be undertaken in accordance with relevant EPA guidance '*Guidance On The Management Of Contaminated Land And Groundwater At EPA Licensed Sites*' (EPA, 2013) and UK Environment Agency Guidance '*Land contamination risk management (LCRM)*' (UK EA, 2021).
- The above mitigation measures will be included and added to as required by the Contractor within the project-specific Detailed CEMP which will be in operation during the construction phase.

7.5. Operational Phase

Mitigation measures for the protection of surface water quality of the receiving watercourses has been developed within the project's drainage design. The inclusion of a filter drains, hydrocarbon interceptors and attenuation will protect surface water quality within the Santry River from hydrocarbon and silt contamination. Refer to Section 7.2 above for details.

With regard to groundwater and surface water quality effects the following mitigation measures are proposed;

- Any minor volumes of fuel, oil or chemicals required during routine maintenance works will be brought to and from the site by the maintenance contractor. While temporarily onsite all chemicals will be kept in secure and bunded areas, with relevant Material Safety Data Sheets available onsite. Any fuel / oil tanks temporarily stored on site will be located in a suitably bunded area and all tanks will be double skinned, with oil / chemical absorbent materials held onsite in close proximity to the tanks. Relevant maintenance contractors will be responsible for ensuring that these measures are fully implemented;
- Under no circumstances, should any material be stored (including stockpiled soils / imported material, and any hazardous material such as fuels, oils, chemicals, and paints etc.) within the 15m buffer zone along the Santry River which is has been designed as a designated riparian zone;
- In the unlikely event of a fuel / oil or chemical spill / leak during routine maintenance works, emergency spill response measures will be implemented with the aim of limiting the volume spilled and recovering as much of the lost product as possible (relevant maintenance contractors will be responsible for ensuring that these measures are fully implemented); and,
- A maintenance programme for the proposed surface water drainage system should be implemented. The Contractor, in consultation with the Client and the design team, will be responsible for ensuring that these measures are fully implemented.

8. In-combination Effects

8.1.1. Requirement for Assessment

The requirement for AA arising out of Article 6(3) of the Habitats Directive covers plans and projects that, “*either individually or in combination with other plans or projects*”, are likely to have a significant effect on one or more Natura 2000 sites. This means that AA is required for any plan or project that, in combination with other plans or projects, would have a significant effect on one or more Natura 2000 sites, irrespective of the presence or absence of such effects from that plan or project on its own. Therefore, regardless of the significance of the effects of the plan or project individually, the potential for significant effects in combination with other plans and projects must be considered in all cases.

8.1.2. Approach and Methodology

The objective of this requirement is to capture significant effects potentially arising from the cumulation or other interaction of non-significant effects from multiple plans and projects. Consequently, the assessment of potential in-combination effects is not a pair-wise assessment, rather, it considers the totality of the effects arising from all plans and projects affecting the Natura 2000 site(s) in question. In identifying the plans and projects to be included in this assessment, it is important to define an appropriate geographical scope and timescale over which potential in-combination effects are to be considered and the sources of information to be consulted, as described below. It is also important to consider the nature of the interactions between effects, which may be additive, antagonistic, synergistic or complex.

8.1.3. Geographical Scope

In defining the geographical scope for identifying potential in-combination effects, it is important to remember that effects are evaluated in view of the conservation objectives of the Natura 2000 site(s) concerned. As such, two or more effects relating to the same conservation objective for a given Natura 2000 site would combine even if their geographical extents did not overlap. For example, the loss of a small area of an Annex I habitat type listed as a qualifying interest of a Natura 2000 site would combine with the loss of an entirely unconnected area of the same habitat type from a remote part of the same site to produce an in-combination effect, the significance of which would need to be evaluated in view of the relevant conservation objective. On that basis, the scope of the assessment of in-combination effects extends to all plans and projects affecting the same conservation objectives as the plan or project under consideration, irrespective of whether those effects are significant or not.

In this case, however, given the scale of the proposed development and sensitivities of the Natura 2000 sites in its Zol, it was deemed most appropriate to include areas in close proximity to the proposed development and its Zol (as described in Section 5.1) within the geographical scope for identifying potential in-combination effects.

8.1.4. Timescale

The timescale over which potential in-combination effects were considered in this case covered plans and projects from 5 years ago (i.e. 2019) to the present and all reasonably foreseeable future plans and projects, i.e. published draft plans and projects which are already in the planning system or have received planning permission.

8.1.5. Sources of Information

The following sources of information were consulted to gather information on other plans and projects:

- Fingal County Council Planning Data viewed through;
<https://fingalcoco.maps.arcgis.com/apps/webappviewer/index.html?id=3fa7d9df584c4d93aab202638db9dd1a>
- An Bord Pleanála Planning Applications viewed through;
<https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>
- Fingal Development Plan 2023-2029²⁸
- Dublin Airport Authority
- Transport Infrastructure Ireland²⁹
- Irish Water³⁰

The threats, pressures and activities with negative impacts on the North Dublin Bay SAC and North Bull Island SPA were used to identify plans and projects which, by their nature, are likely to give rise to potential impacts on the sites concerned.

8.1.6. Assessment

It is considered that the construction and operation phases of the proposed development will not significantly impact the water quality of the Santry River. Baseline surface water monitoring data of the Santry River does not indicate significant or persistent surface water quality issues within the watercourse at the monitoring location downstream of the proposed project (location SW-S-3). Significant impacts from the proposed development on the receiving watercourse are considered unlikely and as such there is no potential for the proposed project to act in combination with other projects in the vicinity to affect the water quality of the Santry River. Therefore, cumulative impacts which could adversely affect the conservation objectives of North Dublin Bay SAC and North Bull Island SPA are considered unlikely.

Notwithstanding this, further detail has been provided, and a technical evaluation undertaken, on the potential for cumulative impacts on European sites occurring as a result of the combination of the proposed project with other planned and permitted projects in the area including those being undertaken by daa.

8.1.6.1. Plans

The Fingal County Development Plan (CDP) set out policies and objectives for the development of the Fingal area. The CDP aims to promote the sustainable development and improvement of the economic, environmental, cultural and social aspects of Fingal. The CDP also requires that any developments must be subject to AA process and that permitted developments comply with the requirements of the WFD, the relevant River Basin Management Plans and the Habitats Directive. A Strategic Environmental Assessment (SEA) was prepared for the CDP and it went through the AA process. The findings of which were integrated into the objectives of the CDP resulting in a plan that afford high levels of protection to the environment and Natura 2000 sites.

8.1.6.2. Granted Developments

A review of Transport Infrastructure Ireland (TII) publicly available planned projects³¹ did not identify any major road projects within 10km of the proposed site.

A review of Uisce Éireann (Irish Water) projects³² identified 1 no. water project in the vicinity of the proposed site development. This project is detailed in Table 8-1 below.

²⁸ <https://www.fingal.ie/development-plan>

²⁹ <https://www.tii.ie/projects/>

³⁰ <https://www.water.ie/projects/>

³¹ <https://www.tii.ie/public-transport/projects-and-improvements/>

³² <https://www.water.ie/projects/?map=our-projects&id=627>

A search of Fingal County Council planning and An Bord Pleanála planning applications has been undertaken for applications submitted within the last 5 years in the vicinity the proposed development (last accessed 20/02/2024). Near the proposed works, projects that have been granted planning permission include retention of existing developments, typical extensions to domestic dwellings or the construction of new domestic dwellings. Regarding potential impacts to water quality, these projects will have to comply with the EPA's Code of Practice for Domestic Wastewater Treatment Systems (EPA, 2021). These developments have conditions attached to their planning permission relating to sustainable development, such as foul surface water and effluent drainage facilities, and clean surface water run-off drainage facilities. Therefore, it is not anticipated that the developments that have been granted permission will have any significant effects in combination with the proposed development.

Key developments which shall be considered are large-scale developments in the region of the proposed project, there are 15 no. of these developments which have been further assessed in terms of in-combination effects with the proposed project and are presented in Table 8-1 below.

It is considered that there are no An Bord Pleanála or Council approved developments or projects that will act in combination with the proposed development to give rise to significant in-combination effects on North Dublin Bay SAC and North Bull Island SPA.

Table 8-1 - Planning applications near Dublin Airport.

Refer Number	Project Applicant	Project Summary	Cumulative Impacts Assessment
ABP Ref: NA29N.314724	MetroLink Rail Order Application	This project comprises the development of a proposed railway, approximately 18.8 kilometres in length, which is mostly underground, through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin. It includes a 9.4km section of single bore tunnel running beneath Dublin City Centre running from Charlemont to Northwood Station and a 2.3km section of single bore tunnel running beneath Dublin Airport. This application was lodged by TII (accompanied by an EIAR and NIS) and is due to be decided by 22/05/2023.	<p>This project was subject to the Appropriate Assessment process which concludes; (Scott Cawley Ltd 2023); <i>'It has been objectively concluded, following an examination, analysis, and evaluation of the relevant information, including in particular the nature of the predicted impacts from the MetroLink Project with account taken of the implementation of the mitigation measures proposed, that the proposed MetroLink Project will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects'.</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
ABP Ref: PA06F.312131	Greater Dublin Drainage Project	This project consists of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility	<p>This project was subject to the Appropriate Assessment process which concludes; (RPS 2023); <i>'It is therefore concluded, beyond reasonable scientific doubt, that the proposed project with the implementation of the prescribed mitigation measures will not give rise to significant impacts, either individually or in combination with other plans and projects, in a manner which adversely affects the integrity of any designated site within the Natura 2000 network.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F17A/0244	Dublin Cemeteries t/a Glasnevin Trust	Permission for the installation of 1 no. ecologation unit, associated internal alterations and plant area within the existing crematorium building (permitted under Reg. Ref: F14A/0216). The proposal also seeks permission for the	<p>This project was subject to the Appropriate Assessment Screening process which concludes; (Scott Cawley Ltd 2017); <i>'It is the professional opinion of the authors of this report that it is possible to rule out likely significant effects on all European Sites.'</i></p>

Refer Number	Project Applicant	Project Summary	Cumulative Impacts Assessment
		retention and completion of the car park adjacent to the crematorium to provide 95 no. car parking spaces, 11 no. car parking spaces adjacent to the substation and lodge, 24 no. car parking spaces at the Entrance Plaza together with associated landscaping, upgrade of internal road network, traffic management measures including electronic barrier and site works.	<p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
FW23A/0250	HPREF Dublin Office Dev Co 1 Limited	Permission for construction of 1 no. light industrial unit, including ancillary office use / visitor centre / staff facilities / reception areas over two levels (Unit P2) with a gross floor area (GFA) of c. 10,106 sq.m (including 1,424 sq.m of ancillary welfare, reception, visitor, and office space). Provision of 105 no. car parking spaces. Provision of an ESB substation and switchroom . Provision of a service yard and loading bays. Provision of 2 no. sprinkler tanks, a pumphouse a storeroom with a recycling, and bin store along with ancillary works including landscaping and area of integrated constructed wetland.	<p>This project provides an Environmental Impact Statement which concludes (Enviroguide 2023); <i>'In view of the Proposed Development, potential impacts and mitigation measures proposed, it is considered the Proposed Development will not likely result in likely significant environmental effects and EIA is not required.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
FW21A/0187	Keelings UC	The development will comprise the construction of a warehouse unit with associated facilities, 69no. car parking spaces and other vehicular spaces and all other associated works.	<p>This project was subject to the Appropriate Assessment Screening process which concludes; (JBA 2021); <i>'It can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>

Refer Number	Project Applicant	Project Summary	Cumulative Impacts Assessment
FW20A/0202	AGRO Merchants Dublin RE Limited	The development will comprise the provision of a food processing warehouse facility (11,696 sq m)	<p>This project was subject to the Appropriate Assessment Screening process which concludes; (Coyle 2020); <i>'It can be concluded that this application, whether individually or in combination with other plans and projects, will have no impacts upon the Natura 2000 sites.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the Proposed Development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
ABP Ref: 301798	Uisce Eireann	10-year permission for development of the Ringsend wastewater treatment plant upgrade project including a regional biosolids storage facility at Newtown, North Road (R135) Dublin 13	<p>This project was subject to the Environmental Impact Assessment Report process which was reviewed as part of the inspectors report; (ABP 2018); <i>'In overall conclusion, the Board was satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the sites' conservation objectives.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the Proposed Development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
FW20A/0187	HPREF Dublin Office DevCo1 Limited (nr 1)	Permission of the construction of 8 no light industrial/warehouse (including wholesale use) / logistics units including ancillary office use and entrance/reception areas. The demolition of 2 no. existing agricultural sheds and the construction of a link road; implementation of a new internal road network with all access points, internal access roads and footpaths, service yards and access roads, cycle paths and landscaping; The construction of 2 no. new roundabouts on Estate Road No. 4, the construction of Estate Road No. 3 branching	<p>This project was subject to the Appropriate assessment process which concludes (John Spain Associates 2020); <i>'It has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no adverse effects on the qualifying habitats and species of conservation interest and on the integrity and extent of ... any relevant European site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>

Refer Number	Project Applicant	Project Summary	Cumulative Impacts Assessment
		west and the extension of Estate Road No. 2 which currently serves Horizon Logistics Park; The development of 2 no. ESB substation buildings and switchrooms and associated facilities	
FW22A/0079	HPREF Dublin Office DevCo1 Limited (nr 2)	<p>Permission for two sites (C&E)</p> <p>Site C consists of the construction of 1no. light industrial/warehouse, 58no. car parking spaces & 14no. bicycle spaces and provision of an ESB Substation and switchroom with all associated construction works</p> <p>Site E consists of the construction of 2no. light industrial/warehouse, 239no. car parking spaces & 76no. bicycle spaces and provision of an ESB Substation and switchroom 2 no. sprinkler tanks and 2 no. pumprooms with all associated construction works</p>	<p>Given the inclusion of mitigation measures significant impacts from the proposed remote south staff car park project on the receiving watercourse (Santry River) will not occur and as such there is no potential for the proposed car park project to act in combination with the warehouse project to affect the water quality of the Santry River. Therefore cumulative impacts which could adversely affect the conservation objectives of North Dublin Bay SAC and North Bull Island SPA are considered unlikely.</p>
F19A/0149	IDA Ireland	Remediation by excavation and removal of circa 22,000 cubic metres of mixed waste material illegally deposited on lands at Belcamp. The project will involve site preparatory works, excavation and infill works, installation of a cut-off wall to the south and south west and restoration with grass and treeline where applicable.	<p>Given the inclusion of mitigation measures significant impacts from the proposed remote south staff car park project on the receiving watercourse (Santry River) will not occur and as such there is no potential for the proposed car park project to act in combination with the remediation project to affect the water quality of the Santry River. Therefore cumulative impacts which could adversely affect the conservation objectives of North Dublin Bay SAC and North Bull Island SPA are considered unlikely.</p>
FW22A/0021	Dublin Port Authority	The development comprises a new solar photovoltaic solar farm at site bounded by Harristown Lane (L3151), St Margaret's Road (R122), and South Parallel Road (R108) in the townland of Sanganhill Td, Finglas ED, Co. Dublin. The development will consist of the installation of a ground mounted solar photovoltaic (PV) array with associated development and ancillary works including inverters, modules and transformers; site	<p>This project was subject to the Appropriate Assessment process (RSK 2022); <i>'It can be excluded on the basis of objective scientific information following screening, that the plan or project, individually or in combination with other plans or projects, will have no likely significant effect on any European site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p>

Refer Number	Project Applicant	Project Summary	Cumulative Impacts Assessment
		cabling; 2 no. substation building; a storage container on a concrete base; an internal access road and attendant surface water drainage; the formation of a new site entrance onto South Parallel Road (R108); security boundary fencing and landscaping; and a security controlled entry gate and lighting.	Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.
F18A/0436	Darragh Hall	The development includes completion of partially constructed part-two, part-three storey Core Aviation type office building as approved under Reg. Ref. F07A/1659 (subsequently extended under F07A/1659/E1). Permission is also sought for alterations and extensions to previously approved building to result in a four storey office building	Given the inclusion of mitigation measures significant impacts from the proposed remote south staff car park project on the receiving watercourse (Santry River) will not occur and as such there is no potential for the proposed car park project to act in combination with the office building project to affect the water quality of the Santry River. Therefore cumulative impacts which could adversely affect the conservation objectives of North Dublin Bay SAC and North Bull Island SPA are considered unlikely to occur.
FW20A/0126	IPUT	4 No. warehouses with marshalling offices, ancillary office space, staff facilities and associated development	<p>This project was subject to the Appropriate Assessment process (JBA 2020); <i>'It can be concluded that given the lack of connectivity through the potential pathways of impact... significant negative impacts are not anticipated to occur on the following Natura 2000 sites.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the Proposed Development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
FW19A/0143	Rohan Holdings Ltd	The construction of 2 no. Single-Storey Units for industrial and/or Warehouse use with ancillary Two-Storey offices with a gross floor area 11,157.90 square meters	<p>This project was subject to the Appropriate Assessment Screening Report process (Rohan Holdings 2019); <i>'It is concluded by the authors of this report that the proposed construction of..., either individually or cumulatively, poses no likely significant effects on any Natura 2000 sites. Thus, it is recommended that is not necessary for the proposed project to proceed Appropriate Assessment.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p>

Refer Number	Project Applicant	Project Summary	Cumulative Impacts Assessment
			Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.
FW21A/0240	Alan & Yvonne Fitzachary	Retention permission for as constructed agricultural dairy milk pasturing shed & permission to complete the development works	Given the inclusion of mitigation measures significant impacts from the proposed remote south staff car park project on the receiving watercourse (Santry River) will not occur and as such there is no potential for the proposed car park project to act in combination with the milking shed project to affect the water quality of the Santry River. Therefore cumulative impacts which could adversely affect the conservation objectives of North Dublin Bay SAC and North Bull Island SPA are considered unlikely.

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8.1.6.3. daa Infrastructure / Maintenance Projects

Proposed developments to be undertaken within Dublin Airport lands have also been considered for their potential to act in combination with the proposed development to cause significant cumulative effects that could impact on the receiving environment. Details of planned and /or ongoing projects, as provided by daa in January 2024, indicate that there are currently 16 no. other daa development projects at the pre-commencement, or construction stages or which are subject to imminent planning applications.

These projects are detailed and evaluated further below in Table 8.2. In summary, taking account of timing, location, nature and scale of the projects, and strict operational and regulatory procedures at the airport, it is considered that there will not be a significant cumulative impact on the proposed development from the additional infrastructure and maintenance projects anticipated for the airport.

Furthermore, the proposed project will not result in significant environmental impacts during the construction phase or during the operational phase. As a result, no significant cumulative environmental impacts associated with this proposed project and live daa projects are likely to occur.

Future developments within Dublin Airport, which have as yet not been subject to grant of planning permission, are assessed in Section 8.1.6.4 below.

Table 8-2 - daa projects within Dublin Airport lands.

Projects	Project	Project Summary	Project Status / Planning Status	Cumulative Impacts Assessment
FW22A/0021	PV Panels	Ground mounted solar photovoltaic (PV) array with associated development and ancillary works	Under Construction	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'it can be excluded on the basis of scientific information following screening, that the plan or project, individually or in combination with other plans and projects, will have no likely significant effect on Any European site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F19A/0426	Airside Operational Buildings	Animal Welfare Facility, Airside Operations Facilities & Substation	Pre-Commencement	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'the proposed development at Dublin Airport poses no risk of likely significant effects on Natura 2000 sites either alone or in combination with other plans or projects...'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F20A/0553	Terminal Upgrade	1 Façade and office upgrade	Construction Underway	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'It is concluded by the authors of this report that the proposed Terminal 1 Redevelopment project, either alone or in combination with other plans or projects, does not pose likely significant effects on European sites'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F20A/0550	North Apron Extension, Apron 5H	Extension of North Apron for 12 no. replacement aircraft stands & ground	Construction Underway	<p>Due to the location (North Apron), nature and scale of the scheme, it is unlikely there will be significant cumulative effects during construction. No cumulative operational effects are likely.</p> <p>Therefore, no cumulative significant effects are likely to occur.</p>

Projects	Project	Project Summary	Project Status / Planning Status	Cumulative Impacts Assessment
		servicing equipment area		
F21A/0518 Ref: ABP-313157-22	Drop Off Pick Up Project	Revised Application for traffic barriers on Dublin Airport private roads and associated works including lane realignment.	Pre-Commencement	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'It is concluded by the authors of this report that the proposed Drop Off and Pick Up project, either alone or in combination with other plans or projects, does not pose likely significant effects on European sites.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
FS5/024/20	South Apron Widening	Enhancement of taxiway system to ease airfield congestion	Underway	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'It is concluded by the authors of this report that the proposed South Apron Taxiway Widening project poses no likely significant effects on Natura 2000 sites. Thus, it is recommended that it is not necessary for the proposed project to proceed to Appropriate Assessment.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F23A/0121	South apron Animal Welfare Relocations	Planning amendment to F19A/0426	Underway	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'Following a comprehensive examination, analysis and evaluation of the potential direct, indirect and cumulative impacts on the qualifying interests of the SAC and the SPA and the implementation of the proposed mitigation measures, it has been concluded by the authors of this report that there will be no residual impacts and the proposed project will not have an adverse effect on the integrity of Baldoyle Bay SAC or Baldoyle Bay SPA or any other European site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p>

Projects	Project	Project Summary	Project Status / Planning Status	Cumulative Impacts Assessment
				Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.
F16A/0155 ABP: 247299	Dublin Airport Central	Demolition and part demolition of buildings to provide for 4 no. office blocks and other works at the former Aer Lingus Head Office Building and modifications to F14A/0436 for new access road	Construction Underway	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'The Appropriate Assessment Screening Report has addressed the potential for significant effects on European Sites, and concluded that none are likely to arise as a result of the proposed development, either alone or in combination with other plans or projects.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F21A/0008	Dispatch Hut and Tug Shelter	The proposed development will comprise a single-storey free-standing General Aviation dispatch hut and Tug shelter and storage shelter on the West Apron	On-Hold	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'For this reason it can be concluded that there is no conceivable risk to the qualifying interest of Natura 2000 sites, and therefore no likely significant effect.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F21A/0255	T2 Hotel	410 bedroom hotel with pedestrian link	Pre-Commencement	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'It has been demonstrated that the proposed project, either individually or in combination with other plans or projects, would not be likely to have a significant effect on any Natura 2000 site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>

Projects	Project	Project Summary	Project Status / Planning Status	Cumulative Impacts Assessment
F20A/0668 ABP Ref: V Add ABP Ref: ABP- 314485-22	CTPRO/Relevant Action	Change to permitted runway operations. (Relevant Action)	Live – In Process	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'Likely significant effects on Rogerstown Estuary SPA, Baldoyle Bay SPA, Ireland's Eye SPA, Lambay Island SPA and South Dublin Bay and River Tolka Estuary SPA from the proposed Relevant Action, both individually and in-combination with other plans and projects, can be excluded.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F22A/0460	Underpass	Airfield Underpass of Runway 16/34	Live – In Process	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'Therefore, in view of best scientific knowledge and on the basis of objective information, it is concluded beyond reasonable scientific doubt that there will be no adverse effect on the integrity of any relevant European site in view of its conservation objectives as a result of the Proposed Development, individually or in-combination with other plans or projects.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F23A/0245	Hangar 7 (watching brief)	Application by RYA for new aircraft hangar (for 4no. Aircraft)	Live – In Process	<p><i>'Following a comprehensive evaluation of the potential direct, indirect and cumulative impacts on the qualifying interests of Baldoyle Bay SAC and Baldoyle Bay SPA and the implementation of the proposed mitigation measures, it has been concluded by the authors of this report that there will be no adverse effects on the integrity of Baldoyle Bay SAC, Baldoyle Bay SPA or any other European site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given that no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>

Projects	Project	Project Summary	Project Status / Planning Status	Cumulative Impacts Assessment
F23A/0132	North Apron Extension	Extension of North Apron to accommodate Hangar 7	Live – In Process	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'Following a comprehensive examination, analysis and evaluation of the potential direct, indirect and cumulative impacts on the qualifying interests of the SAC and the SPA and the implementation of the proposed mitigation measures, it has been concluded by the authors of this report that there will be no residual impacts and the proposed project will not have an adverse effect on the integrity of Baldoyle Bay SAC or Baldoyle Bay SPA or any other European site.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
F23A/0301	Customs Border Protection and South Apron Support Centre	US Pre-clearance and new pier and construction support centre	Live – In Process	<p>This project has been subject to the Appropriate assessment process which concludes; <i>'Following the assessment detailed in this report, it can be concluded beyond reasonable scientific doubt that the proposed development will not, either individually or in combination with other plans or projects, give rise to any impacts which would constitute significant effects on any Natura 2000 site, in view of their conservation objectives. Therefore, it is the recommendation of the authors of this report that Fingal County Council, as the competent authority in this case may determine that Appropriate Assessment is not required in respect of the proposed development.'</i></p> <p>Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites.</p> <p>Given than no likely effects are anticipated from either project, there is no potential for the 2 no. projects to give rise to cumulative impacts which could affect any European site.</p>
Multiple	Noise Monitoring Terminals	NMT's at various locations (outside airport boundary)	Live – In Process	<p>Based on the nature and scale of these projects, it is not anticipated that significant cumulative effects are likely to occur. Additionally, each of these projects will require separate planning applications prior to noise monitoring terminals being erected and environmental assessments will be undertaken as required.</p>

8.1.6.4. Future Airport Development

The proposed development is designed to ensure that Dublin Airport can cater more efficiently for existing staff car parking needs subject to planning permission being granted. It is considered appropriate that the Competent Authority assessing the proposed development would have an overview of long-term Dublin Airport plans, so that the proposed development can be viewed and assessed in the wider context.

This section focuses on all relevant projects and schemes which warrant consideration with respect to potential likely significant effects, but which have not yet been consented or lodged, or those that are pending a planning decision and are subject to change before final design is confirmed.

There are numerous development proposals required for future airport growth to 40 million passengers per annum which have been submitted for planning permission but not yet decided. Future development proposals will require a grant of planning permission in order to be realised, which in itself will entail planning and appropriate assessment.

The proposed development is a standalone application and is not reliant on any other project or future airport growth to be realised. The proposed development is designed to ensure that it will have capacity to cater for the planned growth subject to planning permission. Best practice in design of large infrastructure means that it is designed not just to cater for existing requirements but that it is fit for purpose over the entire life of that infrastructure so far as practically foreseeable.

An awareness of future airport plans is relevant in considering the proposed development given the potential for interaction in the future. The future development plans discussed hereafter are listed in relation to the future development in Dublin Airport and do not form part of the current application for the proposed development.

Capital Investment Programme 2020+

Dublin Airport has been a regulated entity as of 2011, required periodically to submit its proposals for capital investment to the Commission for Aviation Regulation (CAR). In February 2019, the plans for investment to commence the next stage of Dublin Airport's development were submitted to CAR as the Capital Investment Programme (CIP 2020+)³³, with the objective of transforming the airport into a major European airport, welcoming 40 mppa and continuing as one of the top five European transatlantic hubs.

daa is undertaking the CIP 2020+ with significant infrastructural investments that are intended to improve the built environment, from 2022-2026. This programme of incremental infrastructure replacement and upgrades will be delivered in a sustainable manner to enable Dublin Airport to maintain existing and future operations subject to planning permission where relevant. The CIP 2020+ informs the projects that should be considered in the Planned Future Projects section of this Chapter.

Lodged Projects

Infrastructure Application

The Infrastructure Application (IA) is a project to increase the passenger capacity of the airport to 40 million passengers per annum (mppa) and the infrastructure required to facilitate that growth, likely to be reached post 2030, whilst maintaining service levels at the airport.

Construction projects included in the IA are as follows:

- New Apron 7;
- South Apron Expansion;
- North Apron Development;
- Terminal 1 Central Search;
- Long Term Car Parking Red;
- New Staff Car Park North;
- Terminal 2 Multi-Storey Car Park;
- Underpass beneath Runway 16/34;
- Surface Access Infrastructure;
- Airfield Drainage Project; and,
- Construction Compounds.

³³ <https://www.dublinairport.com/corporate/airport-development/cip-2020>

Appropriate Assessment Screening and a Natura Impact Statement was submitted for the IA to Fingal County Council in December 2023. Of note, the IA would also seek permission to raise the annual passenger capacity (currently 32mppa) to 40mppa. The principal operational environmental impact of the IA is likely to be the increase in air and ground traffic movements from Dublin Airport, with associated aircraft / ground noise and greenhouse gas emissions. The timeline for the construction programme of the IA is anticipated to be ca. 10 - 15 years, offering opportunities to manage the timing of potential impacts to limit their cumulative effects.

The IA Natura Impact Statement concludes; *'It is therefore concluded, in view of best scientific knowledge and on the basis of objective information, that the Proposed Development will have no adverse effect on the integrity of any European site in view of its conservation objectives, either alone or in-combination with other plans or projects.'*

Given the inclusion of the aforementioned mitigation measures, the proposed development will not result in likely significant effects on any European sites. Given that no likely effects are anticipated from either project, there is no potential for the Infrastructure Application project and the proposed development to result in cumulative impacts which could affect any European site.

Airfield Drainage Project (ADP)

The ADP involves drainage system enhancement measures with Dublin Airport. The ADP will operate as part of an integrated airfield-wide surface water management system designed to protect water quality in the receiving waters. It is also proposed to provide hydraulic upgrades to the existing network. The following drainage infrastructure upgrades form part of the ADP Project Element:

- Contamination bifurcation pipeline;
- West Apron network upgrades;
- South Apron network upgrades;
- Central Pollution Control Facility; and,
- Contamination Bifurcation Pipeline

The proposed remote south car park is not located with the same surface water management catchment at Dublin Airport as the ADP. Surface water run-off from the proposed development will outfall, via the Santry Stream to North Dublin Bay, whereas surface water from the ADP project site outfalls to Baldoyle Bay.

Given there is no direct or hydrological connectivity between the proposed project and the ADP there is no potential for the 2 no. projects to act in combination to give rise to cumulative effects.

Planned Future Projects

It is unlikely that any of the other daa projects will lead to likely significant effects on European sites. As these projects are 'business as usual' projects, it is reasonable to conclude that, as the works are of similar scale to current and previous works.

Table 8-3 lists these projects and gives a brief description of what they entail with emphasis on any potential likely significant effects. In some cases, there is potential for interaction with the construction of the proposed development, as they would occur close to or within the site. It is not likely that significant effects would occur as a result of interaction due to the nature and scale of the proposed development works and distance of European sites from the proposed development site.

Table 8-3 - Upcoming daa projects

Project	Details	Comments
Cycle Infrastructure	Development of a number of cycle shelters and a 'cycle-port' on the airport campus.	Currently at Feasibility stage. Based on the scale and nature of the Cycle Infrastructure project, no likely significant cumulative effects on any European site will arise.
Cargo Relocations	Development of new cargo facilities and relocation of tenants	Currently at pre-planning stage. Based on the scale and nature of the Cargo Relocations project, no likely significant cumulative environmental effects will arise.
North Apron Operation (FOD/NALMAC)	The development will consist of: a 2 - storey airside operations building of c.1,698 sq.m and c.8.4m in height (max. height of c.9.5m including plant)	Currently at pre-planning stage. Based on the scale and nature of the North Apron Operation

	accommodating a passenger reception centre for airside emergency incidents and primary support function for the airport to include operations, maintenance and storage facilities required for the airfield's foreign object debris and snow bases	project, no likely significant cumulative effects on any European site will arise..
Car Rental	Upgrade Car Rental Facilities	Currently at Feasibility stage. Based on the scale and nature of the Car Rental project, no likely significant cumulative effects on any European site will arise.

9. Concluding Statement

The proposed development has been subject to Appropriate Assessment Screening which determined, following a precautionary principle, the risk of likely significant effects to North Dublin Bay SAC and North Bull Island SPA Qualifying Interest Habitats could not entirely be ruled out.

The NIS has examined the potential impacts of the proposed development on the integrity of North Dublin Bay SAC and North Bull Island SPA alone and in combination with other plans and projects, considering each European site's structure, function and conservation objectives. Where potential likely effects were identified, mitigation measures were identified to mitigate effects.

Following a comprehensive evaluation of the potential direct, indirect and in-combination effects on the qualifying interests of North Dublin Bay SAC and North Bull Island SPA and the implementation of the prescribed mitigation measures, it has been concluded by the authors of this report that there will be no adverse effects on the integrity of European sites as a result of the proposed development, either alone, or in combination with other plans or projects.

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Appendix 5.2: Bat Survey

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Figure 1 – showing layout of site at Dublin Airport



Figure 2 – showing position of two songmeter bat detectors deployed for 3 nights from 17/06/22 to 20/06/22

WALKOVER SURVEY

A walkover ecology survey of the Dublin Airport Site was conducted during daylight hours on 17th June 2022. The site is located on the southern side of the R108 regional road and east of Harristown Lane. Large warehouses in Horizon Logistics Park are located directly south of the site. Entry to the site was gained through a farm gate on the R108.

The entrance gate on the R108 leads to a lane that previously linked up with the northern end of Harristown Lane. This lane is now overgrown and impassable. There is an area of deciduous woodland in the north west corner of the site (ash, sycamore, hawthorn, willow). There is a derelict house with dilapidated wooden kennels to the rear of the house. There is a small brick shed to the south east of the house on the northern side of the drain.

The site is practically divided in two by this drain which runs from west to east.

The habitat on site is mainly improved grassland (GA1) with encroachment of brambles at south west corner of field. There is a scattering of thistles and ragwort throughout the field.

There is a wooded area in the north west corner of the site comprised of ash, sycamore, Hawthorn (WD1). Some of the ash trees are displaying signs of ash die-back disease. A derelict house (BL3) with remains of kennels is situated within this wooded area. The house is comprised of brick walls with a slate roof. There are no doors and many of the windows are either broken or missing. The roof of the building is in relatively good structural repair. There is a trapdoor to the attic space. The building was considered to have moderate potential for bats.

There is also a small brick shed with a slate roof to the south of the house on the northern bank of the drain. This building was also assessed as having moderate potential for bats.

There is a disused laneway running from the northwestern corner of the site to the entrance to the farmyard on R108. Each side of the laneway is flanked with a treeline of elder, hazel, hawthorn, blackthorn and ash (WL2).

There is a mature treeline between the western boundary of the site and Harristown lane (WL2). Trees include hazel, ash, hawthorn. There is a lot of rabbit activity in the bank at the base of this treeline. The southern boundary of the site is a metal security fence with immature native species planted on the southern side of the fence – birch, oak, elder, hawthorn. There is a single mature willow tree on the northern side of the southern boundary fence close to the south western corner of the site. This tree should be retained.

The eastern boundary is marked with a metal security fence along the western side of a closed road leading from the R108 to Horizon Logistics Park.

There is an open drain containing a small watercourse running west-east across the site (FW4). This drain effectively divides the site in two. The channel of the drain is mostly overgrown along its length with bramble, dog rose, bittersweet, vetch, nettle and willow herb. A row of mature ash trees have been recently felled along the westernmost section of the drain to the south of the derelict house. Further east along the drain there are occasional semi-mature hawthorn and ash trees. There is a crossing point used by cattle approximately halfway along the length of the drain. The eastern half of the drain is more enclosed with hawthorn, blackthorn and dense brambles on both sides.

Birds recorded on site include buzzard, mistle thrush (pair), starlings, wren, blackcap, blackbird (2 pairs), dunnock, magpie. An old Blackbird/thrush nest was recorded on a timber in the brick shed south of the derelict house.



Figure 3 – showing direction of flow of watercourse on site from EPA mapping



Figure 4 – Habitats on site

BAT DETECTOR SURVEYS

Hand-held detector survey

A hand-held bat detector survey was conducted on site at dusk on 17/06/22 and at dawn on 18/06/22. Two surveyors conducted the surveys. Equipment included Pettersson D240X time expansion and Pettersson D200 bat detectors in conjunction with Echometer Touch Pro bat detector units plugged into ipad minis.

17/06/22 – Sunset = 21.54, Temp = 18C, Weather = 60% overcast, calm & dry

The emergence survey was conducted at the derelict house from 20 mins before sunset until 23.30 (2 surveyors). No bats were recorded emerging from the house. From 22.05 Leisler's bats were continuously recorded foraging over the field. The field contains a herd of approximately 12 cows. Large numbers of yellow dung flies *Scatophaga stercoraria* were recorded on fresh cow dung in the field. During the maternity/lactation period June/July female Leisler's bats are known to switch their diet from small flies to the larger, more calorific yellow dung fly. Several Common pipistrelles were also recorded foraging in open spaces in the wooded area close to the drain from 22.20 onwards.

Upon completion of the emergence survey, walking transects were conducted by walking around the perimeter of the site. There was no bat activity along the southern and eastern boundaries of the site. Both Common and Soprano pipistrelles were detected foraging along treelines on the north and west boundaries of the site.

Sunrise = 04.56, Temp = 15C, Weather = Overcast, calm & dry

The dawn survey commenced at 03.30. 3 calls of Leisler's bat were detected over the open field during the dawn survey. Two calls of Soprano pipistrelle were recorded along the western treeline boundary with Harristown Lane.

Static Bat Detector Surveys

Two Songmeter 4 bat detectors were deployed on site over the course of three consecutive nights – 17/06/22 – 20/06/22. One unit was placed in the derelict house immediately below the trapdoor to the attic space. The second unit was mounted on a branch in a treeline on the northern boundary of the site.

Songmeter 1 – in house – No bat calls detected

Songmeter 2 – in hedgerow

DATE	SPECIES	NO. OF CALLS	TOTAL NO. CALLS
17/06/22	Leisler's bat	33	61
	Common pipistrelle	18	
	Soprano pipistrelle	10	
18/06/22	Leisler's bat	18	30
	Common pipistrelle	7	

	Soprano pipistrelle	5	
19/06/22	Leisler's bat	42	62
	Common pipistrelle	10	
	Soprano pipistrelle	10	

Table 1 – results of static monitoring along northern treeline on site

RESULTS

The derelict house on site is not currently being used as a roost site by bats. No bats emerged from the house during the dusk survey using hand-held bat detectors. No bats were recorded flying in the house over the period of the static monitoring. The house was considered to have moderate potential as a bat roost. Bats roosting in the house would have limited foraging opportunities and would be mainly confined to the area of this site.

No bats emerged from the brick shed to the south of the house.

The majority of bats foraging on site were Leisler's bats which fed continuously throughout the night but especially during the dusk period. Common and Soprano pipistrelles were recorded foraging along the edge of the wooded area to the north west corner of the site and along the treeline on the western boundary with Harristown Lane.

CONCLUSIONS

Leisler's bats are going to lose an important foraging site as a result of this proposed car park development. The bats are exploiting this area due to the presence of the cattle which attract yellow dung flies.

The wooded area in the north west corner of the site is to be retained. Lighting schemes on site should ensure that no light falls on this wooded area. The treeline between the site and Harristown Lane is also an important foraging area for bats. Lighting should be directed away from this treeline, with no light spillage onto Harristown Lane.

Explore the possibility of retaining the double hedgerow on the western half of the northern site boundary. This hedgerow is used as a foraging area by bats. Numerous species of birds were also recorded in this hedgerow,

If the double hedgerow is to be removed it should be done outside of the bird nesting season.

PHOTOGRAPHS



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Entrance lane to site from R108



Entrance lane flanked by hawthorn, nettles, bindweed, brambles on northern side of lane. A lot of rabbit activity on entrance lane.



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Rabbit activity on entrance lane



Lane that previously joined northern end of Harristown Lane now impassable



Metal barrier on lane north of cattle crush



Stand of mature hawthorn trees north of cattle crush



Northern entrance gate to cattle crush



Entrance lane opening into field. Looking west along treeline of northern section of Harristown Lane (section now impassable)



Looking west along treeline on northern edge of site – ash, hazel, sycamore, brambles



Looking north into former section of Harristown Lane, flanked by ash and hazel



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A lot of rabbit activity on boundary bank between field and disused northern section of Harristown lane



Dilapidated kennels to rear of derelict house close to north west corner of site.



Mature hawthorns to east of derelict house



2 mature ash with signs of ash die back disease standing to east of derelict dwelling house



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Ash trees with signs of ash die back disease



Eastern gable of derelict dwelling house



Dog kennels to rear of house



Rear entrance to house



Internal condition of derelict house



Internal condition of derelict house



Trapdoor to attic space in house



Fox scat on plastic container near house



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Dead willow tree adjacent to house



Dead willow



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Front elevation of dwelling house – brick and concrete



Front elevation of house showing broken window



Front elevation of house showing good condition of roof



Brick shed to front of house beside drain

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Brick shed to front of house beside drain



Old blackbird/thrush nest on wooden board in shed



Drain to south of house with recently felled mature ash trees



Looking north west across drain to shed and dwelling house



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Original gateway from house to Harristown Lane



Western gable of house close to Harristown lane



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Drain between site and Harristown Lane



View to north east across site from wooded area surrounding derelict house



View to south east across site from edge of wooded area with derelict house



Watercourse/drain running across centre of site overgrown with brambles



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Watercourse/drain running across centre of site overgrown with brambles



Spear thistle



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Occasional hawthorn along length of drain



Drain practically dry



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Watercourse practically dry



Mud in drain only rabbit footprints

PHOTOS OF WESTERN BOUNDARY WITH HARRISTOWN LANE

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Mature treeline along western boundary of site with Harristown Lane



Drain between site and Harristown Lane



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Rabbit activity on bank between western boundary of site and Harristown lane



South west corner of site overgrown with brambles



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Treeline at south west corner



Security fence on southern site boundary backed with birch, hawthorn

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Mature willow on southern boundary close to south west corner





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Looking east along southern boundary



Looking north towards northern treeline



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Vegetation on drain at eastern side of site – willow, hawthorn



Vegetation in drain – bramble and bindweed



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Bittersweet in drain



Occasional Blackthorn on eastern half of drain



Eastern boundary of site – security fencing



Rabbit activity close to drain

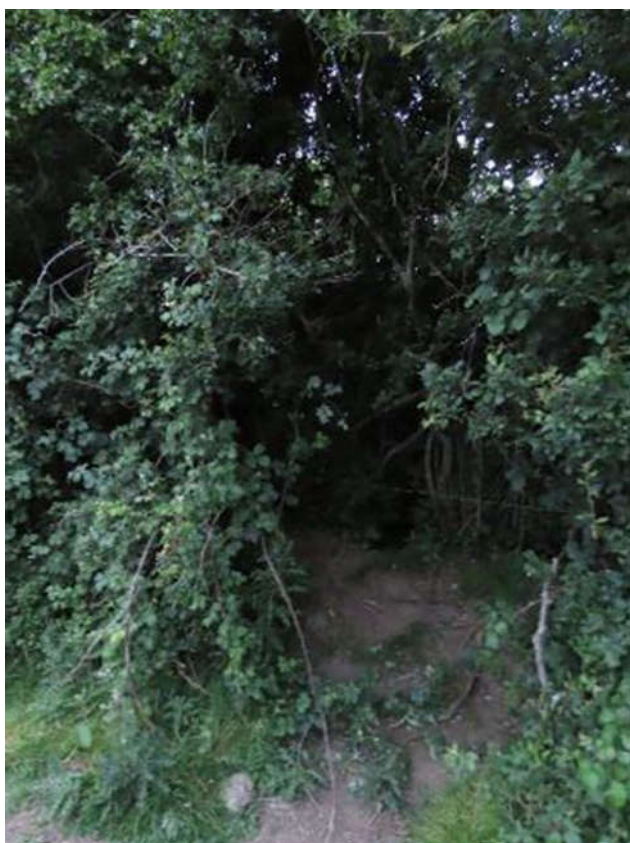


Looking south from drain towards southern boundary

REMOTE BAT DETECTORS IN POSITION



Songmeter 7863 on shelf in house below trap door to attic. Microphone indicated



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Songmeter 7695 on northern treeline (Grid Reference 13489 42476)



Position of microphone indicated

Appendix 6: Landscape and Visual

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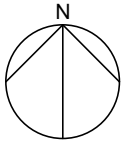
Appendix 6.1: Visibility Drawing

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LEGEND:	
SYM.	DESCRIPTION
	SITE LOCATION
	VIEWPOINT LOCATION



No dimensions are to be scaled from this drawing. All dimensions are to be checked on site. Area measurements for indicative purposes only.

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Appendix 6.2: Viewpoint Images

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Viewing Information

With one eye closed, hold this sheet from your open eye at a viewing distance of 50cm between your eye and the page.

This image is best used for comparison in the field from the viewpoint location shown. It is not a substitute for visiting the viewpoint location.

Printing Note

To give the correct viewing distance the sheet should be printed at a scale of 1:1 at A3 size.



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Viewport Information
Photography date: 17.11.2023
Camera height: 1.6m
Direction: South West
Range: 53m
WGS Coordinates: 53.420586, -6.2895628

WO3 - STAFF CAR PARK SOUTH
VIEWPOINTS
DUBLIN AIRPORT, FINGAL

Viewpoint 01

REV 0

01.12.2023

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Point of Perspective

Approximate site location

Point of Perspective

Point of Perspective

Point of Perspective

Viewing Information

With one eye closed, hold this sheet from your open eye at a viewing distance of 50cm between your eye and the page.

This image is best used for comparison in the field from the viewpoint location shown. It is not a substitute for visiting the viewpoint location.

Printing Note

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Point of Perspective

Approximate site location

Point of Perspective

Point of Perspective

Point of Perspective

Viewing Information

With one eye closed, hold this sheet from your open eye at a viewing distance of 50cm between your eye and the page.

This image is best used for comparison in the field from the viewpoint location shown. It is not a substitute for visiting the viewpoint location.

Printing Note

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Viewing Information

With one eye closed, hold this sheet from your open eye at a viewing distance of 50cm between your eye and the page.

This image is best used for comparison in the field from the viewpoint location shown. It is not a substitute for visiting the viewpoint location.

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Viewport Information

Photography date: 17.11.2023
Camera height: 1.6m
Direction: South East
Range: 60m
WGS Coordinates: 53.42091, -6.29521

WO3 - STAFF CAR PARK SOUTH

VIEWPOINTS
DUBLIN AIRPORT, FINGAL

Viewpoint 04

REV 0

01.12.2023