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Natura Impact Statement for proposed Large Scale Residential Development on lands at Ladywell, Balbriggan, County Dublin

Compiled by OPENFIELD Ecological Services

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The Purpose of this document

This document provides information to allow Fingal County Council to carry out an Appropriate Assessment of the proposed development. This document will assess whether adverse effects to the integrity of the Natura 2000 network are likely to occur as a result of granting planning permission in accordance with Article 6(3) of the Habitats Directive and the Planning and Development (Amendment) Acts. It will determine whether mitigation measures are required to ensure that negative effects can be avoided to the Natura 2000 network.

This report is based on a separate Screening Report for AA which has been prepared by Openfield Ecological Services and which concluded that significant effects to the North West Irish Sea SPA could not be ruled out.

Under the European Communities (Birds and Natural Habitats Regulations) 2011 an NIS:

...means a report comprising the scientific examination of a plan or project and the relevant European Site or European Sites, to identify and characterise any possible implications of the plan or project individually or in combination with other plans or projects in view of the conservation objectives of the site or sites, and any further information including, but not limited to, any plans, maps or drawings, scientific information or data required to enable the carrying out of an Appropriate Assessment.

It should be noted that under Article 42(1) of the aforementioned legislation it is the relevant competent authority, in this case Fingal County Council, which carries out any AA or screening for AA, stating:

A screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to undertake or adopt, and which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site.

This NIS therefore aids in the decision-making process.

It should be noted that there is no prescribed format for an NIS. This report therefore follows the generally accepted format for AA provided by the European Commission.

Methodology

The methodology used for this assessment is set out in a document prepared for the Environment DG of the European Commission entitled 'Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC' (EC, 2021).

An earlier document, 'Assessment of plans and projects significantly affecting Natura 2000 sites 'Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC' (Oxford Brookes University, 2001). Chapter 3, part 1, of this document deals specifically with screening while Annex 2 provides the template for an AA report to be used.

In accordance with this guidance, the following methodology has been used to produce this screening statement:

Step 1: Information Required

This assesses whether adequate information is available in order to complete the AA or if, taking the Precautionary Principle into account, additional data are required.

Step 2: Impact Prediction

This identifies the likely impacts that may arise as a result of the project.

Step 3: Conservation Objectives

An assessment of whether or not there will be adverse effects on the integrity of the Natura 2000 site as defined by the conservation objectives and status of the site.

Step 4: Mitigation Measures

Mitigation through avoidance of adverse effects must be proposed. Where it is likely that significant effects will remain despite mitigation then a full assessment of alternative options must be undertaken and an application for the project to proceed made under Article 6(4) of the Habitats Directive: Imperative Reasons of Overriding Public Interest.

The steps are compiled into an AA report, a template of which is provided in Appendix II of the EU methodology.

Reference is also made to guidelines for Local Authorities from the Department of the Environment, Heritage and Local Government (DoEHLG, 2009).

A full list of literature sources that have been consulted for this study is given in the References section to this report while individual references are cited within the text where relevant.

AA Report (Natura Impact Statement) as per Annex 2 of EU methodology:

Step 1 – Information Required

Describe the elements of the project (alone or in combination with other projects or plans) that are likely to give rise to significant effects on the Natura 2000 site (from the screening report prepared by Openfield)

The development site is located within the Taylor's Hill development zone, to the west of Balbriggan Town, Co. Dublin. The development site is currently occupied by a combination of agricultural land and disturbed ground. Mapping from the Environmental Protection Agency (EPA) shows no water courses running through the site. A drainage ditch flows through the southern portion of the development site and this is a part of the Bremore Stream (also referred to as the Clonard Brook) directly to the east. This enters the Irish Sea at Balbriggan. This location is shown in figures 1 and 2. The proposed site layout is given in figure 3.

The development will consist of the construction of 197 no. dwellings, open space, and ancillary infrastructure will facilitate Phase 4 of the lands at Ladywell in Balbriggan as follows:

- A) 129 no. terraced and semi-detached houses comprising 55 no. 2-bedroom houses (2 storey), 67 no. 3-bedroom houses (2 storey) and 7 no. 4-bedroom houses (3 storey) [house types with variants];
- B) 18 no. terraced and semi-detached 3 bedroom townhouse dwellings; 18 no. Later Living Units (8 no. 1 bedroom & 10 no. 2 bedroom – all bungalows) [house types with variants];
- C) 12 no. 1 bedroom Maisonettes in 6 no. 2-storey semi-detached buildings, and 4 no. 1 bedroom apartments in a 3-storey building (all apartments with terraces) along with 1 no. retail/café unit (c.165 sq. m) and 1 no. retail/medical unit (c. 185 sq. m) [including 'back of house area' & both units to be able to be sub-divided and amalgamated];
- D) 16 no. duplex apartments (comprising 8 no. 1 bedroom [with terrace] and 8 no. 3 bedroom units) in 4 no. 3 storey buildings;
- E) Public open space c.0.85 hectares (with an additional c.0.76 hectares of riparian corridor open space), hard and soft landscaping (including public lighting & boundary treatment) and communal/semi-private open space (c. 660 sq. m) for the proposed townhouse, duplex and apartment units;
- F) Vehicular access will be provided via the Boulevard Road along with the provision of car parking spaces (280 no.), bicycle parking spaces and all internal roads and footpaths and bicycle and bin stores;
- G) Provision of surface water attenuation measures, (including widening of Clonard Brook), connection to water supply, provision of foul drainage infrastructure to Irish Water specifications and all ancillary site development, construction, and landscaping works [and temporary construction access from local road L1130];
- H) The proposal will also amend the layout to elements of the shared layout across the permitted phases to include (Phase 3A [F21A/0055;ABP Ref:312048-21] relating to 29 no. dwellings replaced with 26 no. dwellings, Phase 3B [F22A/0526] relating to layout and Phase 3C [F22A.0670] relating to 3 no. dwellings replaced

with 4 no. dwellings and associated amendments to attenuation (Clonard stream) and services.

- I) Provision of signalised upgrade of the junction of Boulevard Road and the Clonard Road (R122).

The AA screening report provided follows accepted methodologies. It highlights the fact that the development site is within the hydrological catchment of the North West Irish Sea SPA (site code: 4236), although physically separated from it.

The development site was surveyed for previous studies in relation to development applications on June 6th 2019, January 21st 2020, January 13th 2021, July 26th 2022 and May 9th and 29th 2023.

Specifically for this LRD application, the development site was surveyed on January 8th, February 14th, March 15th and April 29th 2024. Habitats are described here with reference to the standard classification system (Fossitt, 2000).

The development site is composed of fields which were until recently entirely in agricultural production but are now a combination of disturbed ground associated with encroaching development to the east as well as remnants of pasture and tillage land.

Only small areas, which have remained undisturbed, are **dry meadow – GS2**. These are dominated by Thistles *Cirsium sp.*, Docks *Rumex sp.*, Creeping Buttercup *Ranunculus repens* and/or Perennial Rye *Lolium perenne*. Some areas of **arable crops – BC1** remain to the north.

To the south there is a field of **improved agricultural grassland – GA1**. A new road has been constructed along the eastern boundary and some of the adjacent land is **bare soil – ED2**, along with lands in the central portion of the site. These are habitats of low or negligible biodiversity value.

Traditional **hedgerow – WL1** field boundaries are found throughout and are composed of Hawthorn *Crataegus monogyna*, Grey Willow *Salix cinerea*, Ash *Fraxinus excelsior*, Blackthorn *Prunus spinosa* and Gorse *Ulex europaeus*. Non-woody species include Cow Parsley *Anthriscus sylvestris*, Meadowsweet *Filipendula ulmaria* and Primrose *Primula vulgaris* as well as the climbers Honeysuckle *Lonicera periclymenum*, Bitter-sweet *Solanum dulcamara* and Ivy *Hedera helix*. Hedgerows to the south tend to be dense and species rich with tall trees. These include some very large Oak *Quercus sp.* to the south-east.

Following methodology from the Heritage Council these can be assessed as of 'higher significance' and are of high local value to biodiversity (Foulkes et al., 2014). Hedgerows to the south are accompanied by **drainage ditches – FW4** which add structure and diversity.

The hedgerows to the north has few or no tall trees and are species poor and so these are assessed as of 'lower significance'. One stretch of hedgerow

around a residential home is dominated by non-native Cypress *Cuprocyparis* sp. and this is of negligible wildlife value. The hedgerow along the boundary with the R122 is relatively-recently planted and is also 'lower significance'.

The development site is not within or near any important area for wintering coastal or seabirds (e.g. wetlands, SPA or Ramsar site). In September 2023 the North West Irish Sea SPA was designated for a range of seabirds (a full description of this SPA is given later in this report). Its boundary lies c.2km to the east. There is no data, including from previous surveys of the development lands, that these lands are regularly utilised for feeding or roosting, or otherwise of importance, for bird species which are listed on Annex I of the Birds Directive or which are qualifying interests of SPAs. For this reason, standard bird count or activity surveys, such as those involving observers stationed at fixed points for long durations, are not considered suitable. Rather, the purpose of wintering surveys undertaken for this application is to establish whether the lands are regularly used by such species and in this regard intermittent walkover surveys are sufficient for this purpose.

This approach is supported by guidelines from the NRA (unknown year, pg95) which states:

Although wintering bird surveys may be required on sites supporting a variety of habitat-types, they are generally more commonly associated with wetland habitats. Winter bird surveys of terrestrial habitats can adopt a similar methodology to breeding bird surveys (see above), since they usually aim to identify the presence or absence of target species and an estimation of numbers of birds.

The January 2020 and 2021 studies (prior to designation of the North West Irish Sea SPA) were carried out during the optimal season for wintering birds. No such bird species of gulls/geese/waders or seabirds (or any species which is a qualifying interest of this SPA) was recorded during these surveys.

Similarly, surveys carried out in January, February and March 2024 did not record any such species. The survey in April 2024 noted a small flock of Herring Gull as well as a single Black-backed Gull and this coincided with ploughing of the field which creates a temporary foraging opportunity for the birds.

There are no plant species growing on the subject lands which are listed as alien invasive under Schedule 3 of S.I. 477 of 2011. There are no habitats which are examples of those listed in Annex I of the Habitats Directive while there is no evidence that species listed in Annex II of that Directive are present.

Currently there is no attenuation of rain run-off and this enters the soil or finds natural, surface pathways to the Bremore Stream. In accordance with the Greater Dublin Strategic Drainage Study this project will incorporate sustainable drainage systems (SUDS) that will ensure no changes will occur to the quantity or quality of run-off compared to the 'greenfield' rate. This will include permeable paving, swales, bioretention systems, above-ground detention basins, a petrol interceptor and flow control device. Following

attenuation, surface water will discharge to the Bremore Stream via a series of new outfall pipes.

SUDS are standard measures which are included in all development projects and are not included here to reduce or avoid any effect to a Natura 2000 site. This is confirmed in the judgment recently issued from the ECJU (Case C-721/21, Eco Advocacy CLG v An Bord Pleanála) which confirms that where standard measures are included in the application they cannot be considered as mitigation in an AA context.

Wastewater from the development will be treated at the Balbriggan wastewater treatment plant. This is licenced by the EPA to discharge treated effluent to the Irish Sea (licence no. D0023-01). As such there is a potential pathway to the waters of the North West Irish Sea SPA, the Rockabill to Dalkey SAC and Rockabill SPA from this source. The plant is built to modern standards and has a capacity to treat a population equivalent (P.E.) of 70,000. According to most recent Annual Environmental Report published by Uisce Éireann this plant was in compliance with the emission standards set under the Urban Wastewater Treatment Directive for 2022. Monitoring of the receiving waters indicates that “the discharge from the wastewater treatment plant does not have an observable impact on the coastal/transitional water quality” and that “the discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.”

Pathway Analysis (from AA Screening)

This project will not result in any direct loss of habitat within the boundary of any SAC/SPA. Figures 1 & 2 show the development location in relation to the SAC/SPA boundaries. As can be seen the boundary of the North West Irish Sea lies approximately 2km to the east, the River Nanny and Shore SPA and the Skerries Islands SPA is approximately 3km and 8km from the site at their nearest points respectively. The distance to the Rockabill to Dalkey SAC is further still.

There is no terrestrial, surface or direct pathway between the development site and any Natura 2000 site.

Hydrological pathways lead to the Irish Sea and at this point the Bremore Stream meets the North West Irish Sea SPA. Due the enormous dilution effect of the Irish Sea, it is not possible for hydrological effects to occur at offshore marine Natura 2000 sites, the Rockabill SPA or the Rockabill to Dalkey SAC, or coastal Natura 2000 sites to the north or south of Balbriggan.

In summary, there are potential pathways for effects to arise to the North West Irish Sea SPA only.

Step 2 - Impact Prediction

The AA screening report describes the elements of the project which “have the potential to cause environmental impact”. These are:

Habitat Loss

There can be no loss of habitat arising in any Natura 2000 site.

Habitat Disturbance

There is no pathway for disturbance to any Natura 2000 site due to the considerable separation distances concerned. The distance to the nearest Natura 2000 site, the North West Irish Sea SPA, is approximately 2km. This is too far for any direct disturbance effects to arise to qualifying interests in this SPA.

Ex-situ Impacts

The development site was surveyed during the optimal period for wintering/wetland birds in 2020, 2021 and 2024. No such bird species was recorded at these times (up to and including March 2024). Data presented already in this report shows that there is no evidence to point to arable lands being of particular significance for gull species which are listed as qualifying interests for the North West Irish Sea SPA. Gulls will use a range of agricultural lands for feeding and roosting, including amenity grasslands and pasture. Given the abundance of agricultural land in north Dublin, including the provision of c.5ha of open space to the north of the development site, it can be concluded that the availability of this habitat, particularly away from the coast, is not a limiting factor to their population and so conversion to urban development is not a pressure or threat to their conservation status.

In summary, there is no evidence that the development lands are of significance to bird species listed at qualifying interests of Natura 2000 sites, or specifically the North West Irish Sea SPA; habitats on the development site are not of significant value for these species; and the abundance of agricultural land in the surrounding area, including the provision of c.5ha of open space to the north of the development site, means that habitat loss cannot be a significant pressure on the conservation status of these species.

No significant ex-situ effects to Natura 2000 sites are likely to arise from this project.

Pollution during construction

During the construction phase, there will be earth works and the disturbance of soil. Works will include installation of surface water discharge pipes to sections of drainage ditch that lead to the Bremore Stream. This may result in some loss of sediment to the Bremore Stream downstream and, potentially, to the Irish Sea and the North West Irish Sea SPA.

This phase will be of a temporary nature. Any run-off from this aspect of the project ultimately leads to the Irish Sea. However, these coastal marine habitats are not sensitive to sediment input in the way that freshwater habitats are.

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Nevertheless, using a precautionary approach, the potential for large quantities of silt or other construction pollutants to be washed downstream means that significant effects to the North West Irish Sea SPA cannot be ruled out. Given the enormous dilution effect of the Irish Sea, the zone of impact of any pollutant plume cannot extend to other Natura 2000 sites.

Pollution during operation - wastewater

The wastewater treatment plant for Balbriggan is operating to a high standard and has ample treatment capacity for the proposed development. No effects are arising to the receiving environment from the discharge while the status of the Irish Sea in this location is 'high'.

Wastewater from this development is not likely to significantly affect Natura 2000 sites.

Pollution during operation – surface water

The surface water drainage strategy is fully complied with the Greater Dublin Strategic Drainage Study and this will ensure the use of SUDS to maintain a 'greenfield' rate of run-off. These are not mitigation measures in an AA context.

No significant effects to Natura 2000 sites are likely to arise from this source.

In combination effects

The development lands are zoned for residential development under the Fingal County Development Plan 2023-2029. This Plan was subject to Appropriate Assessment by the planning authority and this concluded that its implementation would not result in impacts to the integrity of any Natura 2000 area (although this conclusion was prior to the designation of the North West Irish Sea SPA).

This planning application can be viewed as part of wider development by Glenveagh Homes which recently developed Phase 1 at Taylor Hill which comprises 137 no. dwellings on a site of c. 6.2 hectares and Phase 2 at Taylor Hill comprising c. 248 no. dwellings on a site of c. 7.6 hectares. The proposal will include roads and services to facilitate development of 306 no. units on the overall Phase 3 (Phases 3A-3D) Masterplan lands of 9.35 hectares (including Class 1 Public Open Space of c. 0.65 hectares). In summary the overall works for Phase 3 relate to 8.7 hectares (main development site), 0.65 hectares (Class 1 Open Space to the north) and road works to the Boulevard and Clonard Road junction upgrade of 0.49 hectares, resulting in an overall gross site area of 9.84 hectares. These works include installation of surface water drainage and attenuation measures that will discharge to drainage ditches leading to the Bremore Stream. These works are currently underway and are likely to be completed by the time the proposed LRD development is commenced. Other developments considered include Dean Swift Property Holdings Unlimited Company (Planning Ref. LRD0006/S3); and Harvest Lodge Distilleries LTD (Planning Ref. F22A/0033).

In relation to the LRD application to the north, a Natura Impact Statement completed by Altamar, concluded that no adverse effects would arise to Natura

2000 sites. In a submission to the planning authority dated March 2024 it was stated by Altermar that this site “is clearly not an ex-situ site for qualifying interests of nearby SPAs. [...] there is sufficient evidence to show the lack of importance of this site to qualifying interests of nearby SPAs”.

The proposed development will augment this drainage infrastructure.

In addition, infrastructure works to facilitate future community facilities and residential development located in the townlands of Balbriggan, Hampton Demesne and Kilsough North, Co. Dublin have been approved (ABP Ref. 312529-22).

These developments, in combination, will see construction activity as well as built development, some of which will add to loadings to foul and surface water sewers. These potential effects have been analysed in this report and are not likely to result in significant effects to Natura 2000 sites.

Multiple built developments, particularly where construction is concurrent, can contribute to cumulative effects to water courses. Negative effects to water quality could therefore act, in combination, with other developments in the vicinity of the development lands and elsewhere in the catchment of the Bremore Stream (although this is a very small catchment). It has therefore been concluded that significant effects to the North West Irish Sea SPA cannot be ruled out from this source.

Other than during the construction phase, there are no projects or plans which could act in combination with the current proposal to result in significant effects to Natura 2000 sites.

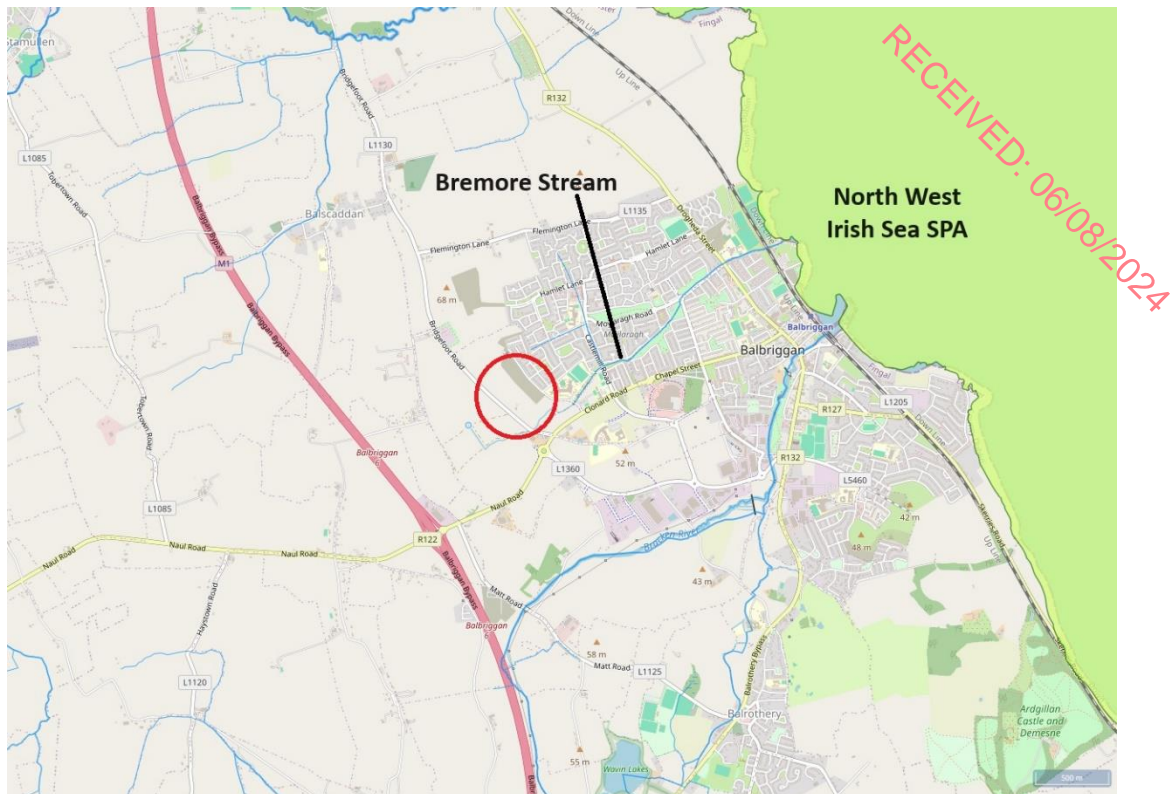


Figure 1 – Site location (red circle) showing proximity to the North West Irish Sea SPA (from www.epa.ie).



Figure 2 – Proposed development layout

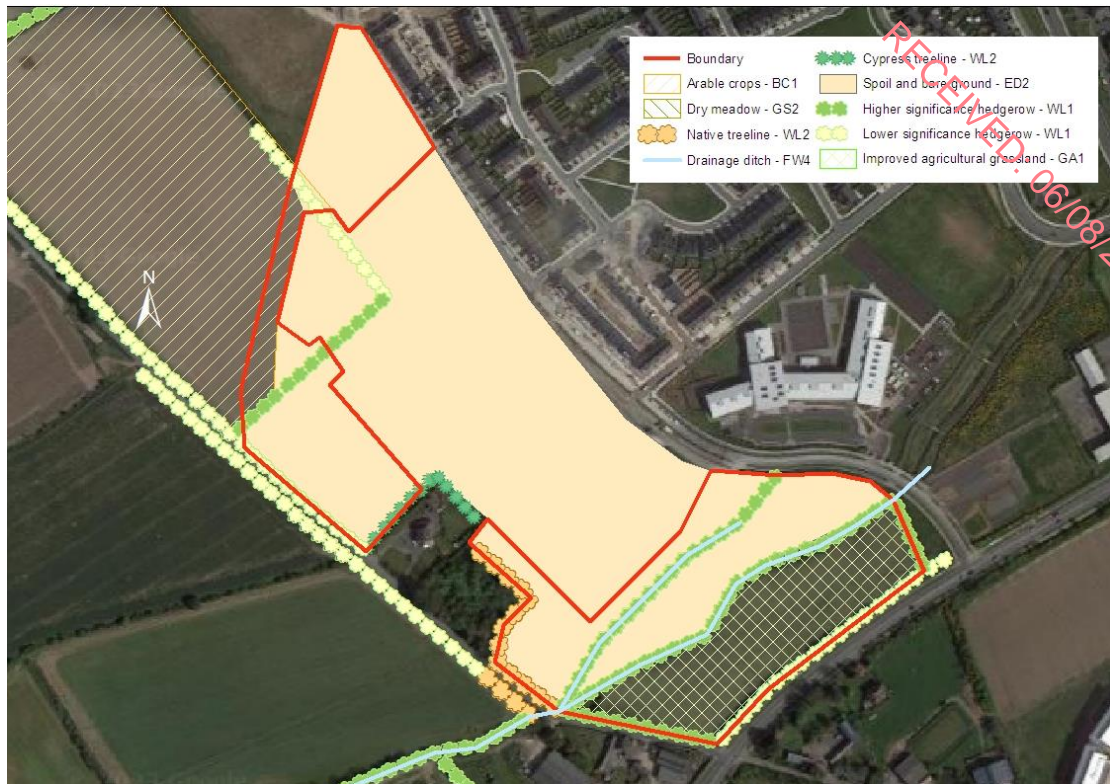


Figure 3 – Site boundary and existing habitats

Step 3 – Conservation Objectives

Set out the conservation objectives of the site

Following the Screening Report for Appropriate Assessment significant effects to the North West Irish Sea SPA could not be ruled out. No significant effects are likely to arise to any other Natura 2000 sites.

Conservation objectives for this SPA have been published (NPWS, 2023).

Birds (similar for all species)

no significant decline in the breeding/non-breeding population; maintain sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population; maintain sufficient number of locations, area of suitable habitat and available forage biomass to support the population target; ensure that the intensity, frequency, timing and duration of disturbance occurs at levels that do not significantly impact the achievement of targets for population size and spatial distribution; ensure that the number, location, shape and area of barriers do not significantly impact the site population's access to the SPA or other ecologically important sites outside the SPA.

Describe how the project will affect key species and key habitats. Acknowledge uncertainties and any gaps in information.

Hydrological pathways exist to the North West Irish Sea SPA. Conservation objectives have been set to maintain the suitability of habitat for each of the qualifying interests of the SPA, as well as the numbers and range of individual species.

Given the potential for large quantities of sediment and other construction pollutants to enter the Bremore Stream, and so discharge to the SPA at the Irish Sea, it is considered that effects to species, and the habitats upon which they depend, cannot be ruled out.

Describe how the integrity of the site (determined by structure and function and conservation objectives) is likely to be affected by the project.

Very large quantities of sediment could increase deposition beyond normal levels, thereby affecting the areas of habitats which are suitable for feeding birds. Construction pollutants such as concrete or hydrocarbons could affect habitat functioning through toxic effects to marine life. This could affect the food chain and so the availability of prey which support the qualifying interests of the SPA.

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Step 4 - Mitigation

Describe what mitigation measures are to be introduced to avoid, reduce or remedy the adverse effects on the integrity of the site. Acknowledge uncertainties and any gaps in information.

- Pollution prevention during construction

Construction will follow guidance from Inland Fisheries Ireland (IFI, 2016) for the protection of fish habitat.

This will include the erection of a robust silt curtain (or similar barrier) along open drainage ditches to prevent the ingress of silt to drainage ditches leading to the Bremore Stream. Water leaving the site will pass through an appropriately-sized silt trap or settlement pond so that only silt-free run-off will leave the site.

A silt curtain or similar barrier will be erected along the drainage ditch leading to the Bremore Stream and will remain in place for the duration of works.

Dangerous substances, such as oils, fuels etc., will be stored in a bunded zone. Emergency contact numbers for the Local Authority Environment Section, Inland Fisheries Ireland, the Environmental Protection Agency and the National Parks and Wildlife Service will be displayed in a prominent position within the site compound. These agencies will be notified immediately in the event of a pollution incident.

Site personnel will be trained in the importance of preventing pollution and the mitigation measures described here to ensure same. It is important to note that substantial works are underway under the permitted phase 3 scheme to install attenuation measures leading to the drainage ditch. Proposed measures in the current application will add to this system while following the same principles.

- Headwall and Surface Water Sewer Construction

It is proposed to install a series of pre-cast headwalls leading to the drainage ditch/Bremore Stream as part of the surface water drainage system at the site. All in-stream works will be carried out in accordance with an approved method statement.

Prior to construction of the headwall, a constraints zone will be identified and implemented at the construction area adjacent to the ditch/stream. This area will ensure the avoidance of physical damage to the ditch/stream, to ensure all work will be carried out in the dry and effectively isolated from the surface water network, and to ensure that no suspended sediment and associated nutrients are released into surface waters from excavation and earthworks. Where works are required that extend to the full width of the ditch, a culvert for example, these works also need to be undertaken entirely in the dry. The location will be dammed at both ends so that no scouring of silt or sediment will take place.

- General Water Protection Measures (taken from the Construction Environmental Management Plan prepared by Paul McGrail Construction Engineers)

Works will follow best practice guidance as outlined in Guidelines on the Protection of Fisheries during Construction Works in and Adjacent to Waters (IFI, 2016), CIRIA 2010 Environmental Good Practice on Site & CIRIA 2001 Control of Water Pollution from Construction Sites: Guidance for Consultants and Contractors. Although the risk of any significant impact on water quality in any receiving water bodies is considered to be extremely low given the lack of running water features on the site. Best practice will be implemented at all times in relation to all construction activities to avoid any accidental pollution events occurring to the wet ditches in the area or polluting the ground water table. This will include the following actions:

- SuDS will be constructed in line with manufacturer's guidelines / best practice methods.
- At this development consist attenuation system stormtech underground to cater for the 100-year return period and a detention basin to cater for the 1-100 year were designed for this site. The design of the attenuation is in accordance with CIRIA SuDS Manual C753 2015. Please refer to the accompanying drawings for further information.
- During construction, any surfaces which are intended to enable infiltration must be protected from compaction. This includes protecting from heavy traffic or storage materials.
- Water contaminated with silt will not be allowed to enter a watercourse or drain as it can cause pollution. All parts of the drainage system will be protected from construction runoff to prevent silt clogging the system and causing pollution downstream. Measures to prevent this include, early construction of sediment management basins, channelling runoff away from watercourses and surface water drains and erosion prevention measures. Following construction, subsoil that has been compacted during construction should be broken up prior to the re-application of topsoil to reinstate the natural infiltration performance of the ground.
- Pipe systems and orifices will be checked for blockages or partial blockages.
- Silt deposited during construction will be removed.
- Soils will be stabilised and protected from erosion whilst planting becomes established.
- Hydrocarbons or any hazardous chemicals will be stored in specific bunded areas. Refuelling of plant and machinery will also be carried out in bunded areas to minimise risk of any potential pollutants being discharged from the site.
- Pollution control measures will be implemented to control run-off from the site and prevent run-off which is potentially contaminated with sediments or hazardous chemicals entering the drainage network.
- Pouring of cement-based materials for works will only be carried out in dry conditions. Pumped concrete will be monitored to ensure there is no accidental discharge. Mixer washings and excess concrete will not be

discharged directly into the drainage network. Concrete washout areas will be created to avoid any accidental discharge from the proposed development site.

- Foul drainage from site offices and compound, where not directed to the existing wastewater network, will be contained and disposed of off-site in an appropriate manner and in accordance with the relevant statutory regulations to prevent the pollution of watercourses.
- A response procedure will be put in place to deal with any accidental pollution events and spillage kits will be available on site. Construction staff will be familiar with the emergency procedures and use of the equipment.

The Assessment of Significance of Effects – Conclusion of Stage 2

This report contains an analysis of the proposed project and its relationship with areas designated under the Habitats and Birds Directives. Pathways exist between the development site and one such area and these have been described in detail. Following this analysis, it is concluded that significant effects to the North West Irish Sea SPA could not be ruled out. Specifically, this may arise from the impact to marine habitats from pollution during the construction phase.

Arising from this assessment, mitigation has been proposed. With the implementation of these measures adverse effects to the integrity of the SPA will not occur. This conclusion is based on best scientific knowledge.

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