ALTEMAR

Marine & Environmental Consultancy

Appropriate Assessment Screening & Natura Impact Statement – Information for a Stage 1 (AA Screening) and Stage 2 (Natura Impact Statement) AA for a proposed Large-Scale Residential Development at Balbriggan, Co. Dublin.

Response to Request for Further Information

10th March 2026

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On behalf of: Glenveagh Homes Ltd.

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1. Introduction

The following Appropriate Assessment Screening and Natura Impact Statement – Information for a Stage 1 (AA Screening) and Stage 2 (Natura Impact Statement) AA has been prepared by **Altemar Ltd.** at the request of Glenveagh Homes Ltd. for a proposed Large-Scale Residential Development (LRD) at Balbriggan, Co. Dublin. This report has been revised in response to a Request for Additional Information received from Fingal County Council (FCC) on the 20th February 2026 (PF/051/26) relating to a proposed Large-Scale Residential Development (LRD) application (Reg. Ref. LRD0069/S3E) at Balbriggan, Co. Dublin.

An Appropriate Assessment is an assessment of the potential effects of a proposed project or plan, on its own, or in combination with other plans or projects, on one or more European sites (Special Areas of Conservation (SAC) or Special Protection Areas (SPA)).

The AA Screening stage examines the likely significant effects of the proposed development, either on its own, or in combination with other plans and projects, upon a European site and considers whether, on the basis of objective scientific evidence, it can be concluded, in view of best scientific knowledge and the conservation objectives of the relevant European sites, that there are not likely to be significant effects on any European site.

The Natura Impact Statement examines whether the plan or project, either alone, or in combination with other plans and projects, in the view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European sites.

1.1 Request for Further Information

The Request for Additional Information received from Fingal County Council (FCC) on the 20th February 2026 (PF/051/26) specifically references the submitted NIS in the following Items:

'*1. The Planning Authority is not satisfied the information provided within the submitted 'Appropriate Assessment Screening & Natura Impact Statement' is sufficient to adequately assess whether the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and the sites' conservation objectives, will adversely affect the integrity of any European sites. The applicant is required to submit a revised NIS which addresses the following:*

(a) *The assessment of 'In-Combination Effects' states 'Following an analysis of development proposals proximate to the subject site, it is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised.' However, the assessment of in combination effects makes no reference to the adjacent development granted permission in March 2025 under Reg.Ref. LRD0048/S3E (ABP-321437-24). The applicant is required to review their assessment of all existing and proposed developments in proximity to the project site and provide an updated assessment of in combination effects as part of a revised NIS.* (See Section 4.4 for revised text)

(b) *The mitigation measures contained in the NIS refer to the environmental protection measures of the submitted CEMP and are considered to be generalised rather than providing details on the specific individual mitigation measures required to protect the integrity of the relevant European sites. To ensure the appropriate assessment contains complete, precise and definitive findings and conclusions, the applicant is required to provide a revised NIS which details the specific individual mitigation measures required to protect the integrity of the relevant European sites.* (See Section 7, Table 6 for revised mitigation measures)

(c) *The NIS notes a petrol interceptor will be utilised on the outfall to the Clonard Brook stream, however, it is stated 'storm water drainage ultimately discharges to the Clonard Brook Stream and the Bremore Stream via the arterial drainage network…..at 5.no connection points'. On this basis, it is considered all additional surface/storm water discharge points to existing surface water features, including that to the Bremore Stream, requires petrol interceptors to be installed with an operational maintenance plan to protect water quality and the integrity of the relevant European sites. The applicant is required to address this matter by way of revised proposals and an updated NIS.'* (See Section 4.2.2 and Figure 7 for Response)

1.2 Altemar Ltd.

Since its inception in 2001, Altemar has been delivering ecological and environmental services to a broad range of clients. Operational areas include residential, infrastructural, renewable, oil & gas, private industry, local authorities, EC projects and State/semi-State Departments. Bryan Deegan is the managing director of Altemar. Bryan is an environmental scientist and marine biologist with 28 years' experience working in Irish terrestrial and aquatic environments, providing services to the State, Semi-State and industry. Bryan Deegan (MCIEEM) holds a MSc in Environmental Science, BSc (Hons.) in Applied Marine Biology, NCEA National Diploma in Applied Aquatic Science and a NCEA National Certificate in Science (Aquaculture).

2. Background to the Appropriate Assessment

The Habitats Directive 92/43/EEC (together with the Birds Directive (2009/1477/EC)) forms the cornerstone of Europe's nature conservation policy. The Directive protects over 1000 animals and plant species and over 200 "habitat types" which are of European importance. In the Habitats Directive, Articles 3 to 9 provide the legislative means to protect habitats and species of European Community interest through the establishment and conservation of an EU-wide network of conservation sites (NATURA, 2000). These are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive), Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment:

"Any plan or project not directly connected with or necessary to the management of the [EUROPEAN] site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the component 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."

As outlined in "Managing European sites, The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" (European Commission, 21 November 2018) *"The purpose of the appropriate assessment is to assess the implications of the plan or project in respect of the site's conservation objectives, either individually or in combination with other plans or projects. The conclusions should enable the competent authorities to ascertain whether the plan or project will adversely affect the integrity of the site concerned. The focus of the appropriate assessment is therefore specifically on the species and/or the habitats for which the European site is designated."*

As outlined in the EC guidance document on Article 6(4) (January 2007)[1]:

"Appropriate assessments of the implications of the plan or project for the site concerned must precede its approval and take into account the cumulative effects which result from the combination of that plan or project with other plans or projects in view of the site's conservation objectives. This implies that all aspects of the plan or project which can, either individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.

Assessment procedures of plans or projects likely to affect European sites should guarantee full consideration of all elements contributing to the site integrity and to the overall coherence of the network, both in the definition of the baseline conditions and in the stages leading to identification of potential impacts, mitigation measures and residual impacts. These determine what has to be compensated, both in quality and quantity. Regardless of whether the provisions of Article 6(3) are delivered following existing environmental impact assessment procedures or other specific methods, it must be ensured that:

[1] European Commission. (2007).Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission;

- *Article 6(3) assessment results allow full traceability of the decisions eventually made, including the selection of alternatives and any imperative reasons of overriding public interest.*
- *The assessment should include all elements contributing to the site's integrity and to the overall coherence of the network as defined in the site's conservation objectives and Standard Data Form, and be based on best available scientific knowledge in the field. The information required should be updated and could include the following issues:*
    - *Structure and function, and the respective role of the site's ecological assets;*
    - *Area, representativity and conservation status of the priority and nonpriority habitats in the site;*
    - *Population size, degree of isolation, ecotype, genetic pool, age class structure, and conservation status of species under Annex II of the Habitats Directive or Annex I of the Birds Directive present in the site;*
    - *Role of the site within the biographical region and in the coherence of the European network; and,*
    - *Any other ecological assets and functions identified in the site.*
- *It should include a comprehensive identification of all the potential impacts of the plan or project likely to be significant on the site, taking into account cumulative impacts and other impacts likely to arise as a result of the combined action of the plan or project under assessment and other plans or projects.*
- *The assessment under Article 6(3) applies the best available techniques and methods, to estimate the extent of the effects of the plan or project on the biological integrity of the site(s) likely to be damaged.*
- *The assessment provides for the incorporation of the most effective mitigation measures into the plan or project concerned, in order to avoid, reduce or even cancel the negative impacts on the site.*
- *The characterisation of the biological integrity and the impact assessment should be based on the best possible indicators specific to the European assets which must also be useful to monitor the plan or project implementation."*

3. Stages of the Appropriate Assessment

This Appropriate Assessment screening was undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2001), Part XAB of the Planning and Development Act 2000, as amended, in addition to the December 2009 publication from the Department of Environment, Heritage and Local Government; 'Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities' and the European Communities (Birds and Natural Habitats) Regulations 2011. In order to comply with the above Guidelines and legislation, the Appropriate Assessment process must be structured as follows:

1) Screening stage:

   - Description of plan or project, and local site or plan area characteristics;
   - Identification of relevant European sites, and compilation of information on their qualifying interests and conservation objectives
   - Identification and description of individual in combination effects likely to result from the proposed project;
   - Assessment of the likely significance of the effects identified above. Exclusion of sites where it can be objectively concluded that there will be no likely significant effects; and,

     Conclusions

2) Appropriate Assessment (Natura Impact Statement):

   - Description of the European sites that will be considered further;
   - Identification and description of potential adverse impacts on the conservation objectives of these sites likely to occur from the project or plan; and,
   - Mitigation Measures that will be implemented to avoid, reduce or remedy any such potential adverse impacts
   - Assessment as to whether, following the implementation of the proposed mitigation measures, it can be concluded, beyond all reasonable scientific doubt, that there will be no adverse impact on the integrity of the relevant European Site in light of its conservation objectives"
   - Conclusions.

If it can be demonstrated during the AA screening phase (Stage 1), that the proposed project will not have a significant effect, whether alone or in combination with other plans or projects, on the conservation objectives of a European site, then no further AA (Stage 2) will be required. It is important to note that there is a requirement to apply a precautionary approach to AA screening. Therefore, where effects are possible, certain or unknown at the screening stage, AA will be required.

In addition, it should be noted that Article 6(3) of the Habitats Directive must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an AA of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.

4. Stage 1 Screening Assessment

4.1 Management of the Site

The project is not directly connected with, or necessary to, the management of European sites.

4.2 Description of the Proposed Project

The development will consist of the construction of 815 no. dwellings (610 no. houses, 194 apartments & 11 no. later living dwellings), a portion of the C-Ring Road, open space, community building/retail floorspace and 2 no. creches as follows:

A) Demolition of existing single storey dwelling (c. 154 sq. m) and agricultural outbuilding (c. 366 sq. m) located to the south of Flemington Lane;

B) Provision of portion of '*C-Ring Road*' from Flemington Lane [to include junctions and ancillary footpaths, cycle paths, lighting, bus stops, boundary wall to adjoining owner, and tie in to existing roads/agricultural access points] to link into the existing R122 roundabout with vehicular access also from the Boulevard Road, Hamlet Lane, & Flemington Lane along with associated amendments to the layout of the Local Road L1130 (also known as the Clonard Road including the creation of a cul de sac arrangement to the south of the C-Ring Road); the provision of car parking spaces (1,037 no.), bicycle parking spaces (1,144 no.) and all internal roads and footpaths and bicycle and bin stores, & substations;

C) Provision of a community pavilion (2 storeys) comprising community floorspace of c. 730 sq. m (with flexible internal spaces) along with a retail unit (c. 419 sq. m) at ground floor of apartment Block F as well as 2 no. 2 storey creches c. 530 sq. m each with ancillary parking and open space areas;

D) 610 no. terraced, semi-detached & detached houses comprising 318 no. 2-bedroom houses (2 storey), 254 no. 3-bedroom houses (2 storey) and 38 no. 4-bedroom houses [house types B1/F4/F5 with variants] 3 storeys;

E) 194 no. apartments in 5 no. apartment buildings (52 no. studio apartments, 87 no. 1 bedroom apartments, 51 no. 2 bedroom apartments and 4 no. 3 bedroom apartments - all apartments with terrace or balcony on elevations) as follows: Block A [4 storeys & 64 no. apartments] comprising 47 no. 1 bedroom apartments and 17 no. 2 bedroom apartments; Block C, [Part 3-4 storeys & 18 no. apartments] comprising 10 no. 1 bedroom apartments, 6 no. 2 bedroom apartments & 2 no. 3 bedroom apartments; Block F [Part 4-5 storeys & 48 no. apartments] comprising 36 no. 1 bedroom apartments and 12 no. 2 bedroom apartments; Block G [Part 3-4 storeys & 40 no. apartments]; comprising 30 no. 1 bedroom apartments and 10 no. 2 bedroom apartments; Block H [part 3-4 storeys & 24 no. apartments] comprising 16 no. 1 bedroom apartments, 6 no. 2 bedroom apartments & 2 no. 3 bedroom apartments;

F) 11 no. single storey 2 bedroom later living houses with associated communal open space;

G) 5.26 hectares of open space comprising Class 1 Open Space (c. 2.39 hectares in the western separate parcel of land), Public open space c.2.87 hectares, hard and soft landscaping (including public lighting & boundary treatment, ESB substations, bicycle and bin stores) and communal/semi-private open space for the proposed apartment units;

H) Provision of surface water attenuation measures, connection to water supply, provision of foul drainage infrastructure (and Uisce Eireann diversion) to Uisce Eireann specifications and all ancillary site development, construction, and landscaping works including reprofiling of the site where required;

I) The proposals will replace the previously permitted LRD under planning reg. ref. LRD0006/S3 & ACP Ref: 319343-24.

The proposed site outline, site location, and site layout plan are demonstrated in Figures 1 & 2.

4.2.1 Landscape

The landscape design for the proposed development has been prepared by Parkhood Landscape Architects to accompany this planning application. The proposed landscape masterplan is demonstrated in Figure 3.

Figure 1. *Proposed site outline and location*

Figure 2. *Site layout plan - overall*

Figure 3. *Proposed landscape masterplan*

4.2.2 Drainage

An Engineering Services Report has been prepared by Paul McGrail Consulting Engineers to accompany this planning application. This report outlines the following foul and surface water drainage strategy for the proposed development:

Foul Water Drainage

In relation to foul infrastructure, this report outlines the following:

'*The internal foul network has been designed in accordance with Irish Water Code of Practice for Wastewater Infrastructure. The proposed development will have 6No. of discharges points for the to an existing 225, 300 and 375 diameter foul sewer at Flemington Park, Hamlet Lane and Boulevard Road.'*

'We refer the Planning Authority to the enclosed Confirmation of Feasibility from Uisce Eireann, included in the application.'

The foul water drainage system for the proposed development has been designed in accordance with the Irish Water Code of Practice and will be separate to the surface water drainage system. The foul water from the development will discharge via soil vent pipes within the buildings by gravity flow before connecting into the existing separate foul sewer network within the development. The foul sewerage for each house will have a separate connection to the proposed 225mm and 150mm diameter foul sewer along the road.'

Based on the 2024 Environmental Report[2] the Barnageeragh WWTP is operating within capacity has a remaining capacity of 19504 (Person Equivalents).

Storm Water Drainage

In relation to storm water drainage, this report outlines the following:

'There are 5No. surface water connection points for this site which it will be into the Flemington Lane at the north boundary of the site, on the Flemington Park at northeast of the boundary, at existing Taylor Hill Terrace, at the north of the Boulevard Road with allowance of 50l/s as agreed with FCC as part of the granted permission from Taylor Hill Phase 3A, 3B & 3C and to the last connection to the existing Roundabout at R122.'

Further, in relation to the proposed SuDS measures implemented into the proposed storm water drainage design, this report outlines the following:

'It is proposed to use a sustainable urban drainage system (SuDS) approach to stormwater management throughout the site where possible. The overall strategy aims to provide an effective system to mitigate the adverse effects of urban stormwater runoff on the environment by reducing runoff rates, volumes and frequency, reducing pollutant concentrations in stormwater.

The SUDs features proposed in our development are as follows:

Modular Permeable Paving

Porous surfacing (paving block or open graded material) which can treat rainwater, at source, and allow infiltration through to an underlying porous sub-base where water can be stored within the voids of the sub-base before being slowly released to the drainage collection system through natural flow via the porous medium. Partial infiltration systems are proposed to be used as the existing subgrade (ground) is not capable of absorbing all the water through infiltration. This type of permeable paving system includes a permeable geotextile at its base and also includes an outlet to the surface water system. These systems will allow some form of storage for small rainfall events and will result in infiltration, water evaporation and adsorption in small quantities, therefore there will be less run-off from these areas in small rainfall events thus mimicking the natural response for this catchment. As well as reducing the amount of run-off from the surface, permeable paving will slow down the rate of runoff from the pavement in extreme rainfall events contributing to attenuation of flows. In addition, permeable paving will increase the quality of water which is intercepted by the system through filtration, biodegradation, pollutant adsorption and settlement and retention of solids, also the reduction in peak flows to the outfall will enhance settlement and biodegradation of pollutants.

The modular permeable paving will be adopted at all driveways that are within the house property lines serving as first treatment train for roof storm water runoff.

[2] https://www.water.ie/sites/default/files/2025-08/D0023-01_2024_AER.pdf

Swales

Located next to roadways, "shallow, flat bottomed, vegetated open channels designed to convey, treat and often attenuate surface water runoff … often used to drain roads, paths or car parks, where it is convenient to collect distributed inflows of runoff, or as a means of conveying runoff on the surface while enhancing access corridors or other open space ". (The SuDS Manual – CIRIA C753, London, 2015).

The swales will be located on green spaces along roads and will be serving as one of the first treatment train to the roads and paths storm water runoff.

Bioretention Systems

Bioretention systems are shallow landscape depressions that can reduce run off rates and volumes and treat pollution using engineered soils and vegetation. They are particularly effective in delivering interception and can also provide attractive landscape features Habitat and biodiversity Cooling of the microclimate due to evapotranspiration.'

'Detention Basins

As an above-ground storage, to store runoff from a storm event of 1 in 100 years "that are normally dry except during and immediately following storm events. They can be on-line components where surface runoff from regular events is routed through the basin and when the flow rise, because the outlet is restricted, the basin fills and provides storage of runoff and flow attenuation… The water quality benefits of a vegetated detention basin increase as the detention time for an event becomes longer". (The SuDS Manual – CIRIA C753, London, 2015).

Stormtech Underground

An Arch structure with a maintenance/inspection tunnel for providing underground surface water attenuation storage and can infiltrate runoff to the ground where the subgrade is suitable. These will be the primary attenuation systems for the site and will be located under the detention basin in the open space areas. The Isolator row of the Stormtech is a filter strip that provides enhanced suspended solids and pollutant removal while providing surface area for infiltration and run off reduction. The storage structure has been designed to achieve online treatment.

Petrol Interceptor.

A Treatment equipment for where relative low risk areas, offering a suitable means of treatment and oil separation which may be present duo to minor leaks from vehicles and accidental spillage.'

'Hydrobrake flow control.

Hydrobrake is a vortex flow control device to limit the flow from the developed site to the original greenfield run off.

Each Hydrobrake has been designed for the relevant catchment area and head of water.'

It should be noted that the proposed SuDS measures are to be implemented into the drainage design as best practice to manage stormwater locally, to mimic natural drainage and infiltration and to prevent flooding. SuDS measures are not included or designed solely as a means to prevent silt and pollutants discharging to local watercourses. These standard compliance measures would be in place whether or not watercourses or designated sites were or were not in the vicinity of the proposed development. The proposed drainage layout is demonstrated in Figures 4-6.

RFI Response – Item 1(c)

As confirmed ~~detailed in the Response prepared~~ by Paul McGrail Consulting Engineers, petrol interceptors were included as part of the original surface water drainage design that accompanied the original planning application. "Proposed Petrol Interceptors" was absent from the surface water drainage drawing legend; however, the location of petrol interceptors was included in the original drainage drawings. A revised Surface Water Masterplan drawing was prepared by Paul McGrail Consulting Engineers (Figure 7) to highlight the presence of petrol interceptors along the original surface water drainage design. This design included an allowance for the existing petrol interceptor constructed along the surface water drainage network within the adjacent LRD0048/S3E (ABP-321437-24) development at its discharge point to the Clonard Brook. As a result, all surface water discharge points to existing surface water features ultimately include a petrol interceptor within the original surface water drainage design. During operation, petrol interceptors will be inspected and maintained as per the manufacturer's specifications.

4.2.3 Site Specific Flood Risk Assessment

A Site Specific Flood Risk Assessment has been prepared by Paul McGrail Consulting Engineers to accompany this planning application. This report concludes with the following:

'The Site Specific Flood Risk Assessment for the proposed development was undertaken in accordance with the requirement of the Planning System and Flood Risk Management Guidelines for the Planning Authorities, November 2009 and is considered to be adequately protected in consideration of future scenario of flood event in the area.

The proposed development site is located within flood risk Zone C, as defined in paragraphs 5.1 of the Flood Risk Guidelines and the location of the site is appropriate for the proposed residential development from a flood risk perspective. A Justification Test is not required the site is entirely located in the Flood Zone C.

The Minimum Finished Floor Level is 41.300m O.D. which is approx. 15m above the 0.1% AEP Event. Planning System and Flood Risk Management Guidelines Sequential, Approach is met and the 'Avoid' principal achieved.

The closest river "Bracken River" is located approximately 1.4km south of the proposed development and the river "Delvin River" is located approximately 1.54km north of the proposed development. Tidal flooding is not relevant as the site is approximately 40m above sea level.'

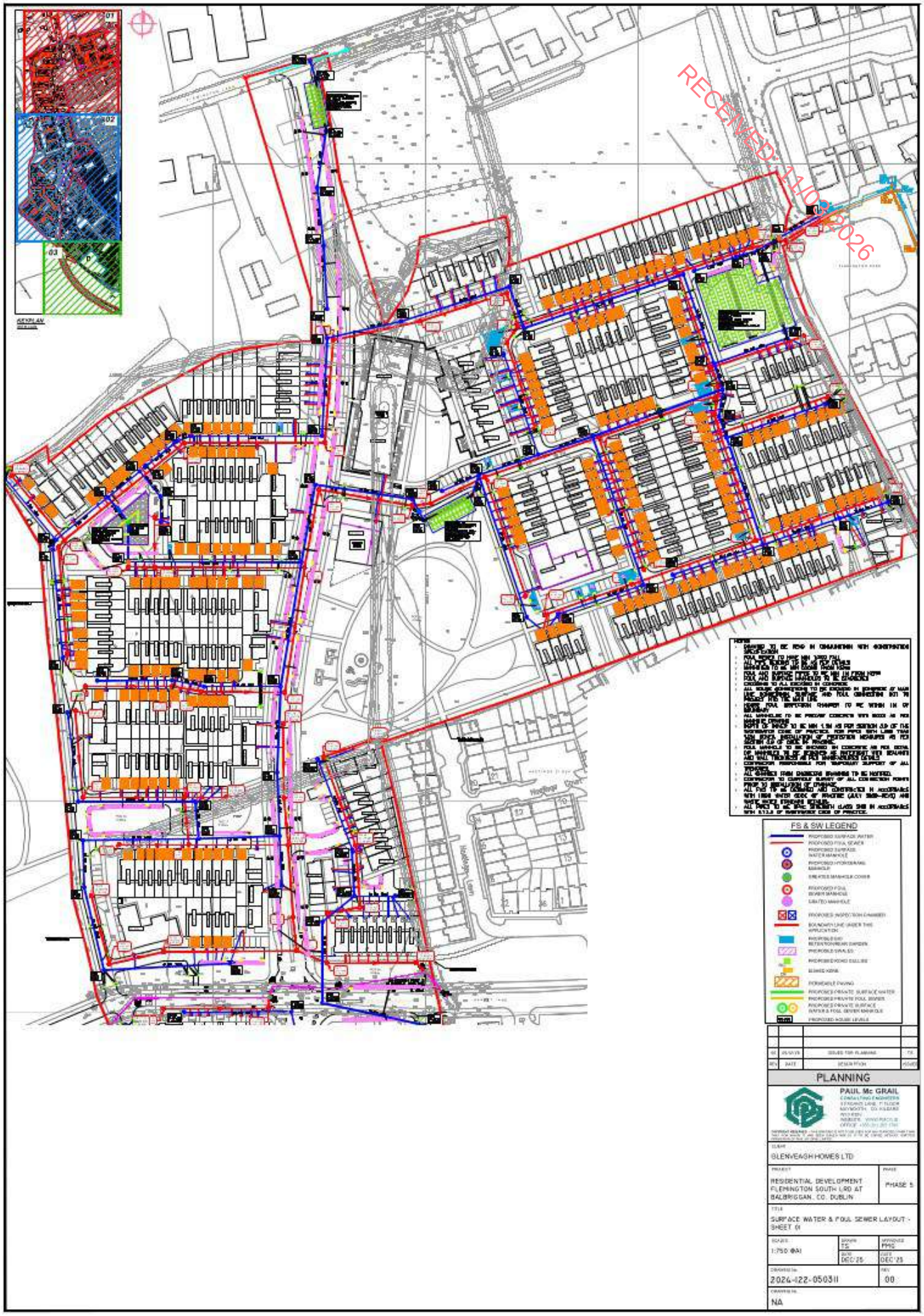

Figure 4. *Proposed drainage layout sheet 1*

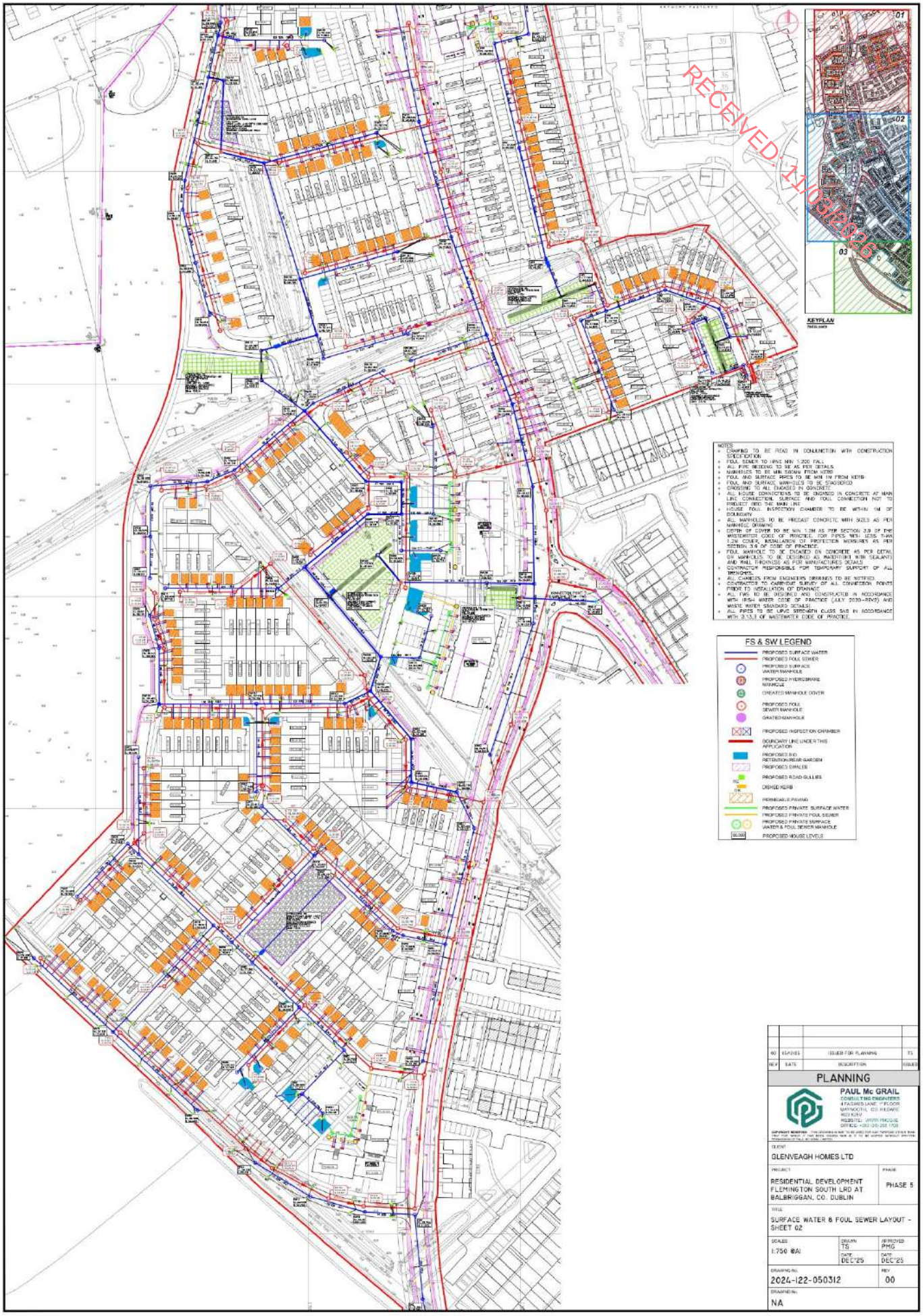

Figure 5. *Proposed drainage layout sheet 2*

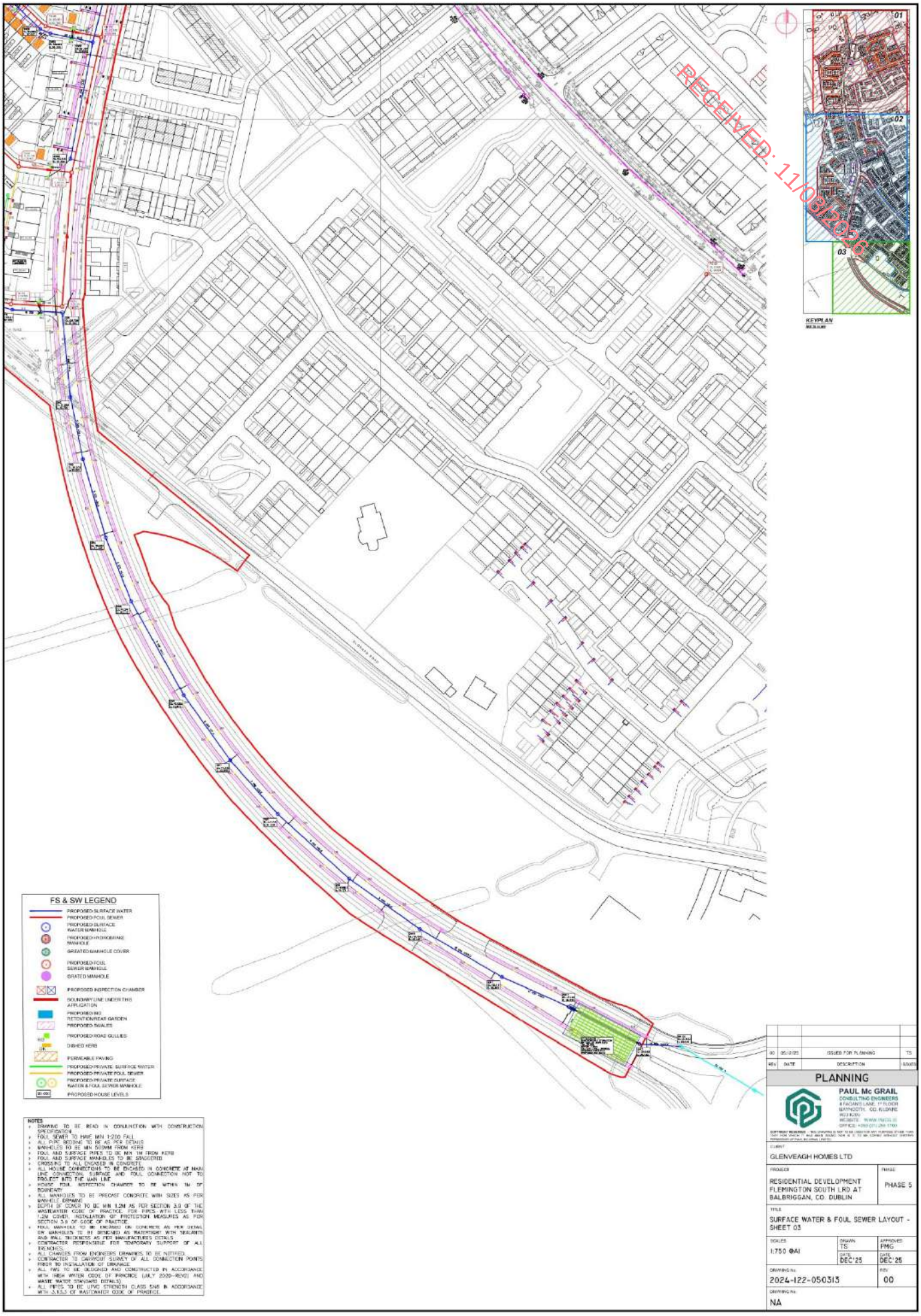

Figure 6. *Proposed drainage layout sheet 3*

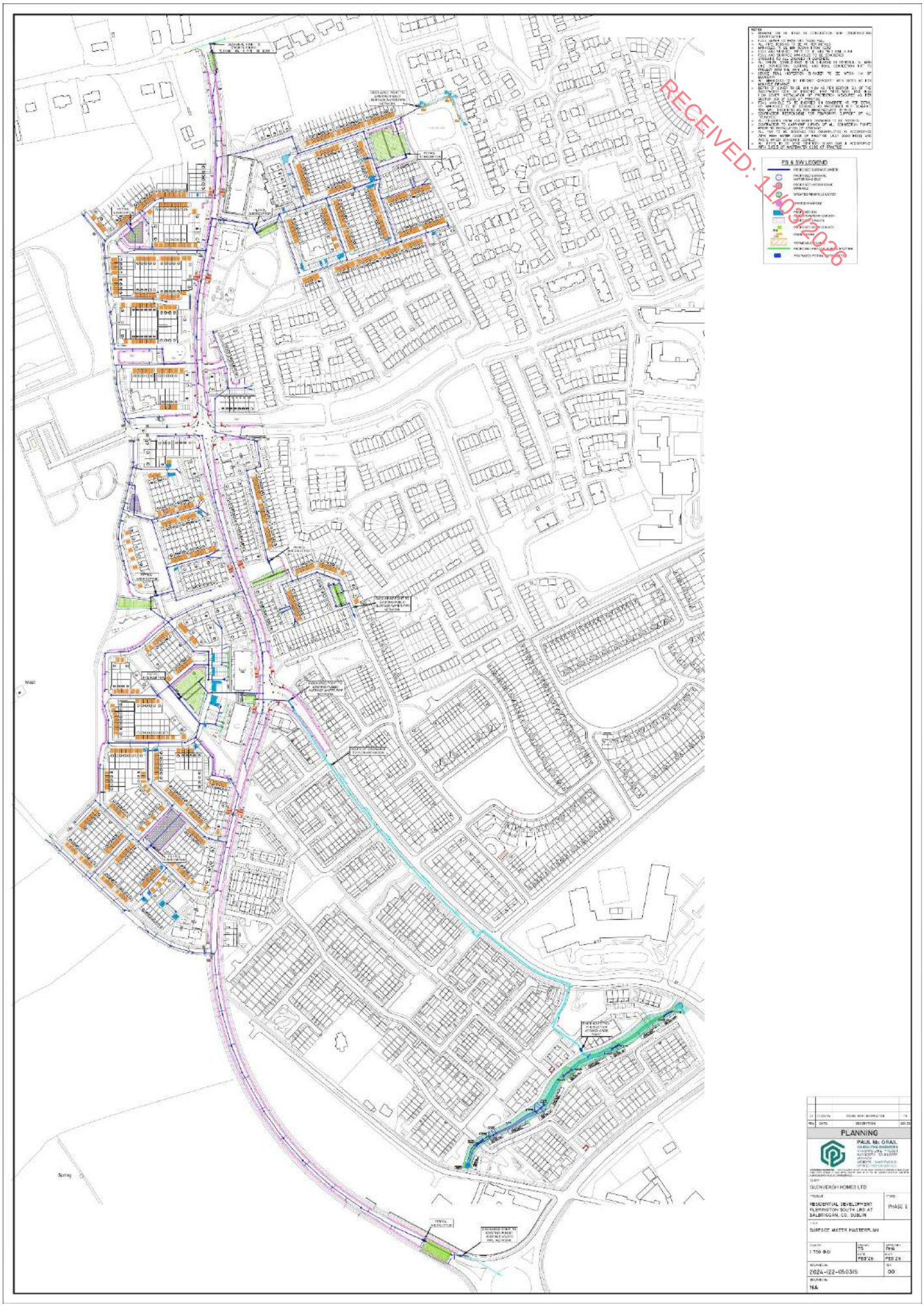

Figure 7. *Surface Water Masterplan (included in Response to Item 1(c)*

4.2.4 Wintering Bird Surveys

Spring 2023

A wintering bird assessment was carried out in Spring 2023 (January to March 2023). As outlined in Appendix Ia "*Birds observed at the Flemington Lane site are typical of the habitats present. The species assemblage is a reflection of the agricultural fields, hedgerows and overgrown waste ground habitats within and around the site and the birds observed are typical of birds occurring in these habitats in North County Dublin in Winter*." In relation, to yellowhammer (red listed) as outlined in Appendix Ia "*A single individual was flushed from one of the OSR fields on the 18th March. A male and female was observed on the 21st of March. A scarce bird in Ireland, but can be quite frequently observed in parts of North County Dublin and Meat*h."

Winter 2023/2024

As outlined in Appendix Ib, a full wintering bird survey for the 2023/2024 season was carried out on site. This has included two surveys per month from October 2023 to March 2024, by the ornithologist Joseph Adamson MCIEEM. No significant numbers of wintering birds from neighbouring Natura 2000 sites have been noted on site. As noted in Appendix Ib "*Birds observed at the Flemington Lane site are typical of the habitats present. The species assemblage is a reflection of the agricultural fields, hedgerows and overgrown waste ground habitats within and around the site and the birds observed are typical of birds occurring in these habitats in North County Dublin in Winter.*

The agricultural grassland fields to the west of the site within the boundary of the water treatment plant were devoid of birds for the most part, with the exception of birds observed flying overhead and occasional foraging rooks when the fields were saturated due to frequent rain events." It is also important to note that of all the qualifying interests of nearby SPA's, only Herring gull were noted on site throughout all of the 20203/2024 wintering bird surveys and with that, the maximum amount observed on site were "*20 birds sitting and occasionally foraging in the stubble field by the road leading up to the Water Treatment Plant on the 4th of November 2023*."

Winter 2024/2025

As outlined in Appendix II, a full wintering bird survey for the 2024/2025 season was carried out on site. This has included two surveys per month from October 2024 to March 2025, by Frank Spellman and Jack Doyle of Altemar. No significant numbers of wintering birds from neighbouring Natura 2000 sites have been noted on site. As noted in Appendix II: '*A total of 31 species were recorded within, above and adjacent to the survey area across 12 surveys. 19 green, nine amber and three red species of conservation concern were recorded either within, over and adjacent to the overall survey area. Red listed species recorded within the survey area included kestrel, meadow pipit, and yellowhammer. Meadow pipit and redwing were recorded foraging throughout the survey area. 3 species listed as Qualifying Interests of North-West Irish Sea SPA were recorded: black-headed gull, common gull and herring gull. It should be noted that a single instance of 5 no. brent geese were observed flying over the subject site at a height of 200m.*

The proposed residential development is predicted to reduce available foraging areas for wintering birds, in particular those listed as Qualifying Interests (QI) of nearby SPAs. However, no bird species protected as QIs of proximate SPAs were recorded foraging within the survey area during any of the 12 site surveys between October 2024 – March 2025. Further, the reduction in foraging and potential roosting areas are not significant in the context of the wider area available to species of relevance due to the widespread and abundant habitats of comparable suitability. As a result, no significant impacts on wintering bird species foraging and moving between foraging/roosting sites are likely in the absence of mitigation measures. No significant impact on species listed as QIs of any European Site or bird species of conservation interest are predicted.'

4.3 Identification of Relevant European Sites

The proposed development site is not within a European site. As outlined in Practice Note PN01 from the Office of the Planning Regulator "Appropriate Assessment Screening for Development Management" (March 2021) "*The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source- Pathway-Receptor framework and not by arbitrary distances (such as 15 km)*."

The proposed development site is primarily a greenfield site consisting of arable land located within a suburban/agricultural environment at Balbriggan, Co. Dublin. The nearest European site is the North-West Irish Sea SPA (1.5 km) (Figure 9). The nearest waterbodies to the subject site are the Clonard Brook Stream and the Bremore Stream (Figure 10), a watercourse network that ultimately outfalls to the marine environment at the Irish Sea c. 2km to the east of the site. After consultation with Paul McGrail Consulting Engineers, it was outlined that, after attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site and the road network to the south, which in turn outfalls to the Clonard Brook Stream, Bremore Stream, and, ultimately, the marine environment. All surface water drainage from the site will ultimately pass through a petrol interceptor. Foul wastewater drainage will ultimately be discharged to an existing foul drainage network. Foul wastewater will be treated along this network at the Balbriggan/Skerries Wastewater Treatment Plant under licence, which has capacity and is compliant. As a result, it is considered that there is an indirect hydrological connection to proximate Natura 2000 sites located within the marine environment via the proposed foul and surface water drainage strategy.

Given the scale of the proposed development, the distance between the subject site to the nearest Natura 2000 Site (1.5 km to the North-West Irish Sea SPA) and the fact that the storm water drainage ultimately discharges to the Clonard Brook Stream and the Bremore Stream via the arterial drainage network currently servicing the existing housing estate to the east of the site, and that works will take place in close proximity to the stream (Figure 10) that leads to the North West Irish Sea SPA, it is, therefore, considered that the ZOI of the proposed project includes the site outline, the Clonard Brook Stream, Bremore Stream and North-West Irish Sea SPA. In the absence of mitigation, and out of an abundance of caution, there is the potential for dust, silt, and contaminated surface water runoff to enter the Clonard Brook Stream and the Bremore Stream during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation with the potential for downstream impacts on the North-West Irish Sea SPA. No significant effects on any other European Sites are likely via this hydrological pathway. Any silt or pollutants that may enter this network will settle, be dispersed, or diluted to negligible levels within the surface water drainage network, watercourse network, and extensive marine environment.

In the interest of carrying out a thorough assessment in line with both the Habitats Directive, and the precautionary principle, the area of assessment was expanded beyond the ZoI to include designated sites within 15km of the proposed development site, and sites beyond 15km with the potential for a hydrological connection. This was done in the interest of ensuring that any pathways, however indirect or remote, were taken into account. All European sites within 15km are listed in Table 1. The qualifying interests, and the potential impact of the proposed development on each European site and qualifying interest, are screened out in Table 2. The SACs and SPAs within 15km of the works site are demonstrated in Figures 8 and 9. Waterbodies and European sites located proximate to the proposed development are demonstrated in Figures 10 – 12.

Table 1. Distances to NATURA 2000 sites within 15km (and beyond with a potential hydrological connection)

Natura 2000 Site	Distance	Direct / Hydrological Biodiversity Connection
Special Areas of Conservation (SAC)		
Rockabill to Dalkey Islands SAC	9.6 km	No
Boyne Coast and Estuary SAC	9.6 km	No
Rogerstown Estuary SAC	11.1 km	No
River Boyne And River Blackwater SAC	12.9 km	No
Malahide Estuary SAC	14.7 km	No
Special Protection Areas (SPA)		
North-West Irish Sea SPA	1.5 km	No
River Nanny Estuary and Shore SPA	3.7 km	No
Skerries Islands SPA	7.9 km	No
Rockabill SPA	10.1 km	No
Rogerstown Estuary SPA	11.2 km	No
Boyne Estuary SPA	11.6 km	No
Malahide Estuary SPA	14.7 km	No

Table 12. Initial screening of European sites within 15km, and European sites beyond 15km with potential of hydrological connection to the proposed development

European Site Code	Name	Screened IN/OUT	Details/Reason
Special Areas of Conservation			
IE003000	Rockabill to Dalkey Island SAC	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Reefs [1170] *Phocoena phocoena* (Harbour Porpoise) [1351] **Potential Impact** The proposed development is located over 9.6 km from the SAC. There is no direct pathway to this SAC. There is a weak indirect hydrological pathway to this SAC via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SAC (9.6 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SAC are foreseen via the weak indirect pathways of foul and surface water drainage. No potential impact is foreseen. There is no direct pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE001957	Boyne Coast and Estuary SAC	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Estuaries [1130] 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 (*Glauco-Puccinellietalia maritimae*) [1330] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]

European Site Code	Name	Screened IN/OUT	Details/Reason
			Potential Impact The proposed development is located over 9.6 km from the SAC. There is no direct pathway to this SAC. There is a weak indirect hydrological pathway to this SAC via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SAC (9.6 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SAC are foreseen via the weak indirect pathways of foul and surface water drainage. No potential impact is foreseen. There is no direct pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE000208	Rogerstown Estuary SAC	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** 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 (*Glauco-Puccinellietalia maritimae*) [1330] Mediterranean salt meadows (*Juncetalia maritimi*) [1410] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] **Potential Impact** The proposed development is located over 11.1 km from the SAC. There is no direct pathway to this SAC. There is a weak indirect hydrological pathway to this SAC via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SAC (11.1 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network

European Site Code	Name	Screened IN/OUT	Details/Reason
			during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SAC are foreseen via the weak indirect pathways of foul and surface water drainage. No potential impact is foreseen. There is no direct pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE002299	River Boyne and River Blackwater SAC	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Alkaline fens [7230] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0] *Lampetra fluviatilis* (River Lamprey) [1099] *Salmo salar* (Salmon) [1106] *Lutra lutra* (Otter) [1355] **Potential Impact** The proposed development is located over 12.9 km from the SAC. There is no direct pathway to this SAC. There is a weak indirect hydrological pathway to this SAC via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SAC (12.9 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SAC are foreseen via the weak indirect pathways of foul and surface water drainage. No potential impact is foreseen. There is no direct pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE000205	Malahide Estuary SAC	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.

European Site Code	Name	Screened IN/OUT	Details/Reason
			Qualifying Interests Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330] Mediterranean salt meadows (*Juncetalia maritimi*) [1410] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] **Potential Impact** The proposed development is located over 14.7 km from the SAC. There is no direct pathway to this SAC. Given the distance to this SAC (14.7 km) across a substantial marine environment, it is considered that there is no direct or indirect hydrological pathway to this SAC. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the minimum distance to this SAC (14.7 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SAC are foreseen via the weak indirect pathways of foul and surface water drainage. No potential impact is foreseen. There is no direct or indirect pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
Special Protection Areas			
IE004236	North-West Irish Sea SPA	**IN**	**Conservation Objectives** The maintenance of habitats and species within European sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Red-throated Diver (*Gavia stellata*) [A001] Great Northern Diver (*Gavia immer*) [A003] Fulmar (*Fulmarus glacialis*) [A009] Manx Shearwater (*Puffinus puffinus*) [A013] Cormorant (*Phalacrocorax carbo*) [A017] Shag (*Phalacrocorax aristotelis*) [A018] Common Scoter (*Melanitta nigra*) [A065] Little Gull (*Larus minutus*) [A177] Black-headed Gull (*Chroicocephalus ridibundus*) [A179] Common Gull (*Larus canus*) [A182] Lesser Black-backed Gull (*Larus fuscus*) [A183]

European Site Code	Name	Screened IN/OUT	Details/Reason
			Herring Gull (*Larus argentatus*) [A184] Great Black-backed Gull (*Larus marinus*) [A187] Kittiwake (*Rissa tridactyla*) [A188] Roseate Tern (*Sterna dougallii*) [A192] Common Tern (*Sterna hirundo*) [A193] Arctic Tern (*Sterna paradisaea*) [A194] Little Tern (*Sterna albifrons*) [A195] Guillemot (*Uria aalge*) [A199] Razorbill (*Alca torda*) [A200] Puffin (*Fratercula arctica*) [A204] **Potential Impact** The development site is located within an agricultural / suburban area approximately 1.5km from this SPA. There is no direct hydrological pathway to this SPA. There is an indirect hydrological pathway to this SPA via surface water drainage. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, the Bremore Stream and, ultimately, the marine environment. Given the scale of the proposed development, the nature of the proposed works, the proximity of the subject site to the Clonard Brook Stream and Bremore Stream, and the fact that the North-West Irish Sea SPA is located immediately downstream of the site via the Bremore Stream (Figure 12), it is considered that, in the absence of mitigation, and out of an abundance of caution, there is the potential for dust, silt and contaminated surface water runoff to enter the Clonard Brook Stream and Bremore Stream with the potential for downstream impacts on this SPA. Out of an abundance of caution, mitigation measures are required to protect this SPA from significant effects. There is an indirect hydrological pathway from the proposed development site to this SPA via foul water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. In the absence of mitigation, no significant effects on the qualifying interests of this SPA are likely via the indirect hydrological pathway of foul wastewater drainage. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of this SPA. Further, given the minimum distance to this SPA (1.5 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. Out of an abundance of caution, and in the absence of mitigation measures, it is considered that significant effects on the qualifying interests of this SPA are likely via the indirect hydrological pathway to the Clonard Brook Stream and Bremore Stream (surface water

European Site Code	Name	Screened IN/OUT	Details/Reason
			discharge to existing housing estate to the east of the site, which in turn outfalls to the marine environment via the Bremore Stream). **Stage 2 AA (Natura Impact Statement) is required.**
IE004158	River Nanny Estuary and Shore SPA	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Oystercatcher (*Haematopus ostralegus*) [A130] Ringed Plover (*Charadrius hiaticula*) [A137] Golden Plover (*Pluvialis apricaria*) [A140] Knot (*Calidris canutus*) [A143] Sanderling (*Calidris alba*) [A144] Herring Gull (*Larus argentatus*) [A184] Wetland and Waterbirds [A999] **Potential Impact** The proposed development is located over 3.7 km from the SPA. There is no direct pathway to this SPA. There is a weak indirect hydrological pathway to this SPA via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SPA (3.7 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SPA are foreseen via the weak indirect pathways of foul and surface water drainage. The habitats on site are not suitable to form an ex-situ site for birds from proximate SPA's. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of proximate SPAs. Further, given the minimum distance to this SPA (3.7 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. No potential impact is foreseen. There is no direct pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**

European Site Code	Name	Screened IN/OUT	Details/Reason
IE004122	Skerries Islands SPA	**OUT**	**Conservation Objectives** To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. **Qualifying Interests** Cormorant (*Phalacrocorax carbo*) [A017] Shag (*Phalacrocorax aristotelis*) [A018] Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] Purple Sandpiper (*Calidris maritima*) [A148] Turnstone (*Arenaria interpres*) [A169] Herring Gull (*Larus argentatus*) [A184] **Potential Impact** The proposed development is located over 7.9 km from the SPA. There is no direct pathway to this SPA. There is a weak indirect hydrological pathway to this SPA via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SPA (7.9 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SPA are foreseen via the weak indirect pathways of foul and surface water drainage. The habitats on site are not suitable to form an ex-situ site for birds from proximate SPA's. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of proximate SPAs. Further, given the minimum distance to this SPA (7.9 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. No potential impact is foreseen. There is no direct pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE004014	Rockabill SPA	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Purple Sandpiper (*Calidris maritima*) [A148]

European Site Code	Name	Screened IN/OUT	Details/Reason
			Roseate Tern (*Sterna dougallii*) [A192] Common Tern (*Sterna hirundo*) [A193] Arctic Tern (*Sterna paradisaea*) [A194] **Potential Impact** The proposed development is located over 10.1 km from the SPA. There is no direct pathway to this SPA. There is a weak indirect hydrological pathway to this SPA via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SPA (10.1 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SPA are foreseen via the weak indirect pathways of foul and surface water drainage. The habitats on site are not suitable to form an ex-situ site for birds from proximate SPA's. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of proximate SPAs. Further, given the minimum distance to this SPA (10.1 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. No potential impact is foreseen. There is no direct pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE004015	Rogerstown Estuary SPA	**OUT**	**Conservation Objectives** To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. **Qualifying Interests** Greylag Goose (*Anser anser*) [A043] Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] Shelduck (*Tadorna tadorna*) [A048] Shoveler (*Anas clypeata*) [A056] Oystercatcher (*Haematopus ostralegus*) [A130] Ringed Plover (*Charadrius hiaticula*) [A137] Grey Plover (*Pluvialis squatarola*) [A141] Knot (*Calidris canutus*) [A143] Dunlin (*Calidris alpina*) [A149] Black-tailed Godwit (*Limosa limosa*) [A156]

European Site Code	Name	Screened IN/OUT	Details/Reason
			Redshank (*Tringa totanus*) [A162] Wetland and Waterbirds [A999] **Potential Impact** The proposed development is located over 11.2 km from the SPA. There is no direct pathway to this SPA. There is a weak indirect hydrological pathway to this SPA via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SPA (11.2 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SPA are foreseen via the weak indirect pathways of foul and surface water drainage. The habitats on site are not suitable to form an ex-situ site for birds from proximate SPA's. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of proximate SPAs. Further, given the minimum distance to this SPA (11.2 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. No potential impact is foreseen. There is no direct pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE004080	Boyne Estuary SPA	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Shelduck (*Tadorna tadorna*) [A048] Oystercatcher (*Haematopus ostralegus*) [A130] Golden Plover (*Pluvialis apricaria*) [A140] Grey Plover (*Pluvialis squatarola*) [A141] Lapwing (*Vanellus vanellus*) [A142] Knot (*Calidris canutus*) [A143] Sanderling (*Calidris alba*) [A144] Black-tailed Godwit (*Limosa limosa*) [A156] Redshank (*Tringa totanus*) [A162]

European Site Code	Name	Screened IN/OUT	Details/Reason
			Turnstone (*Arenaria interpres*) [A169] Little Tern (*Sterna albifrons*) [A195] Wetland and Waterbirds [A999] **Potential Impact** The proposed development is located over 11.6 km from the SPA. There is no direct pathway to this SPA. There is a weak indirect hydrological pathway to this SPA via foul and surface water drainage. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the substantial distance to this SPA (11.6 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SPA are foreseen via the weak indirect pathways of foul and surface water drainage. The habitats on site are not suitable to form an ex-situ site for birds from proximate SPA's. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of proximate SPAs. Further, given the minimum distance to this SPA (11.6 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. No potential impact is foreseen. There is no direct pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**
IE004025	Malahide Estuary SPA	**OUT**	**Conservation Objectives** The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level. **Qualifying Interests** Great Crested Grebe (*Podiceps cristatus*) [A005] Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] Shelduck (*Tadorna tadorna*) [A048] Pintail (*Anas acuta*) [A054] Goldeneye (*Bucephala clangula*) [A067] Red-breasted Merganser (*Mergus serrator*) [A069] Oystercatcher (*Haematopus ostralegus*) [A130] Golden Plover (*Pluvialis apricaria*) [A140]

European Site Code	Name	Screened IN/OUT	Details/Reason
			Grey Plover (*Pluvialis squatarola*) [A141] Knot (*Calidris canutus*) [A143] Dunlin (*Calidris alpina*) [A149] Black-tailed Godwit (*Limosa limosa*) [A156] Bar-tailed Godwit (*Limosa lapponica*) [A157] Redshank (*Tringa totanus*) [A162] Wetland and Waterbirds [A999] **Potential Impact** The proposed development site is located within a suburban / agricultural environment, 14.7 km from this SPA. There is no 'direct' or 'indirect' Source-Pathway linkage between the proposed development site and the SPA. Given the distance to this SPA (14.7 km) across a substantial marine environment, it is considered that there is no direct or indirect hydrological pathway to this SPA. Foul wastewater will be treated along the existing public foul infrastructure under licence. After attenuation on-site, surface water drainage will be discharged at 5.no connection points to the arterial drainage network currently servicing the existing housing estate to the east of the site, which in turn outfalls to the Clonard Brook Stream, Bremore Stream and, ultimately, the marine environment. In the absence of mitigation, given the minimum distance to this SPA (14.7 km) across a marine environment, any silt or pollutants that may enter the surface water drainage network during construction (via excavation, soil-stripping, transportation, demolition, and building works) and operation will settle, be dispersed, or diluted to negligible levels within the drainage network, watercourse network, and marine environment. No likely significant effects on the qualifying interests of this SPA are foreseen via the weak indirect pathways of foul and surface water drainage. The habitats on site are not suitable to form an ex-situ site for birds from proximate SPA's. A number of wintering bird assessments were carried out onsite in 2023, 2024, & 2025(Appendix Ia, Ib, & II). Results from these surveys demonstrate that the site is not of significance to wintering birds and is not an ex-situ site for wintering birds of proximate SPAs. Further, given the minimum distance to this SPA (14.7 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant noise/vibration impacts or impacts on foraging activity on bird species protected as QIs of this SPA are likely. No potential impact is foreseen. There is no direct or indirect pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site. **No significant effects are likely.**

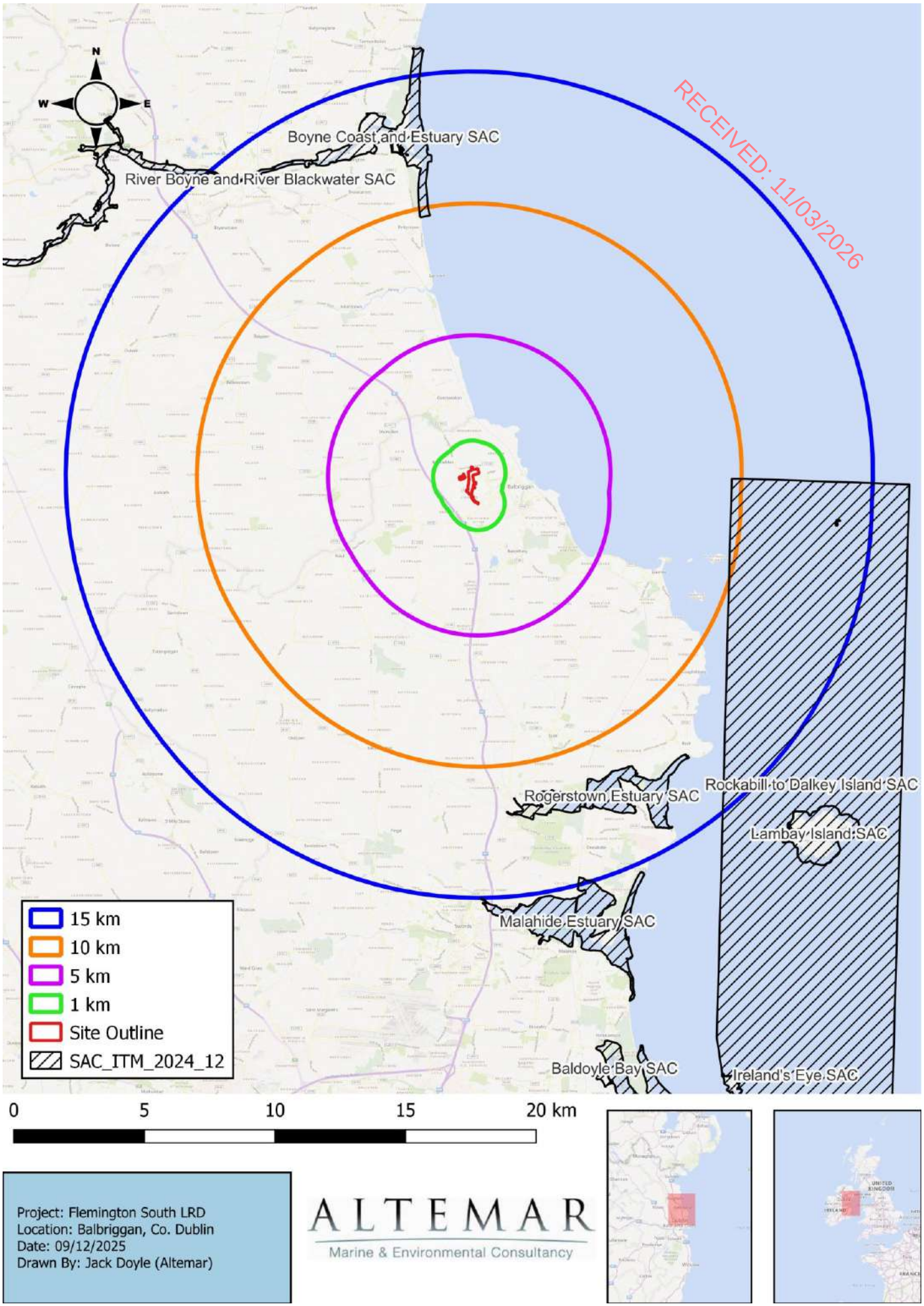

Figure 8. *Special Areas of Conservation (SAC) within 15km of the subject site*

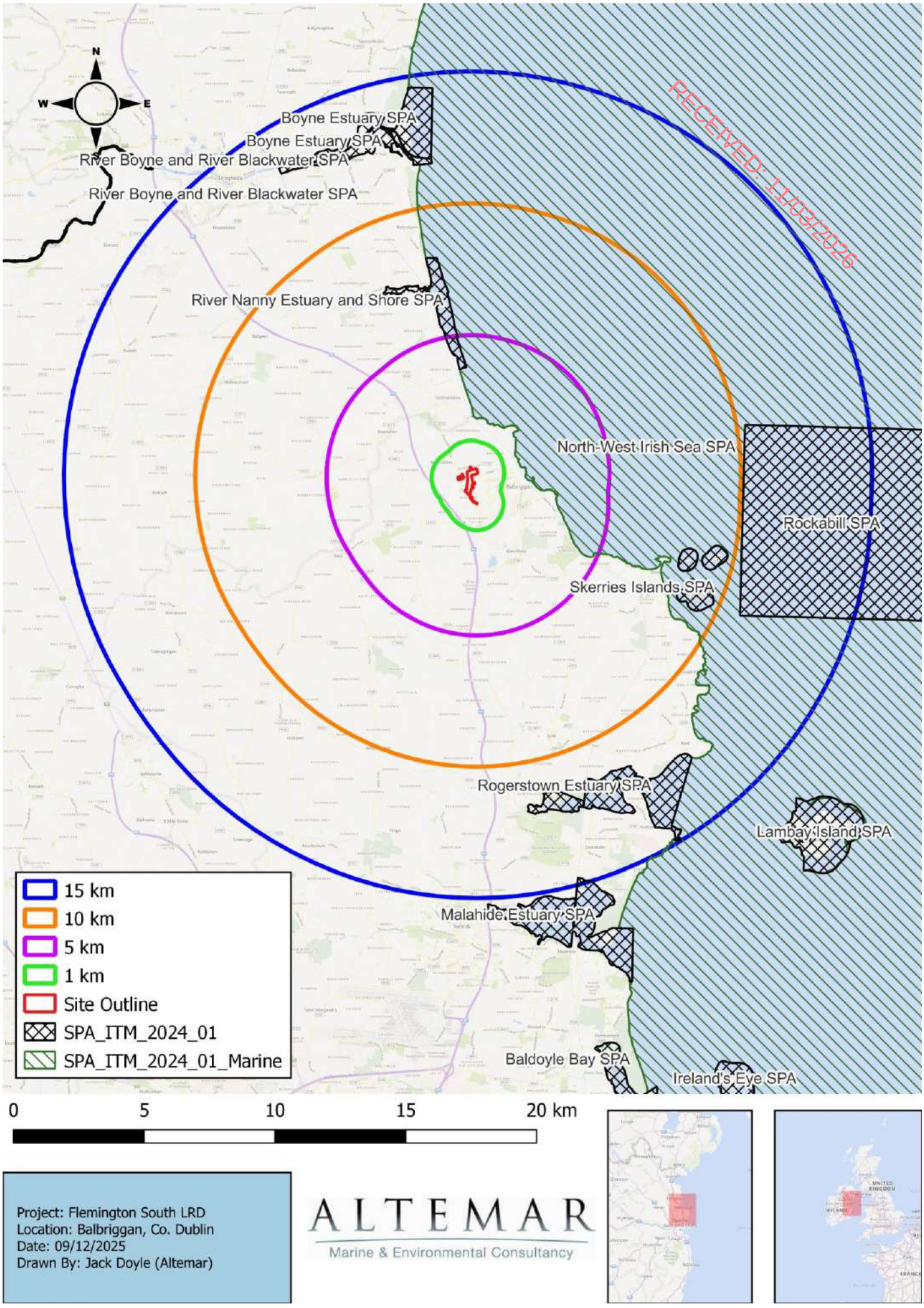

Figure 9. *Special Protection Areas (SPA) and Marine SPAs within 15km of the subject site*

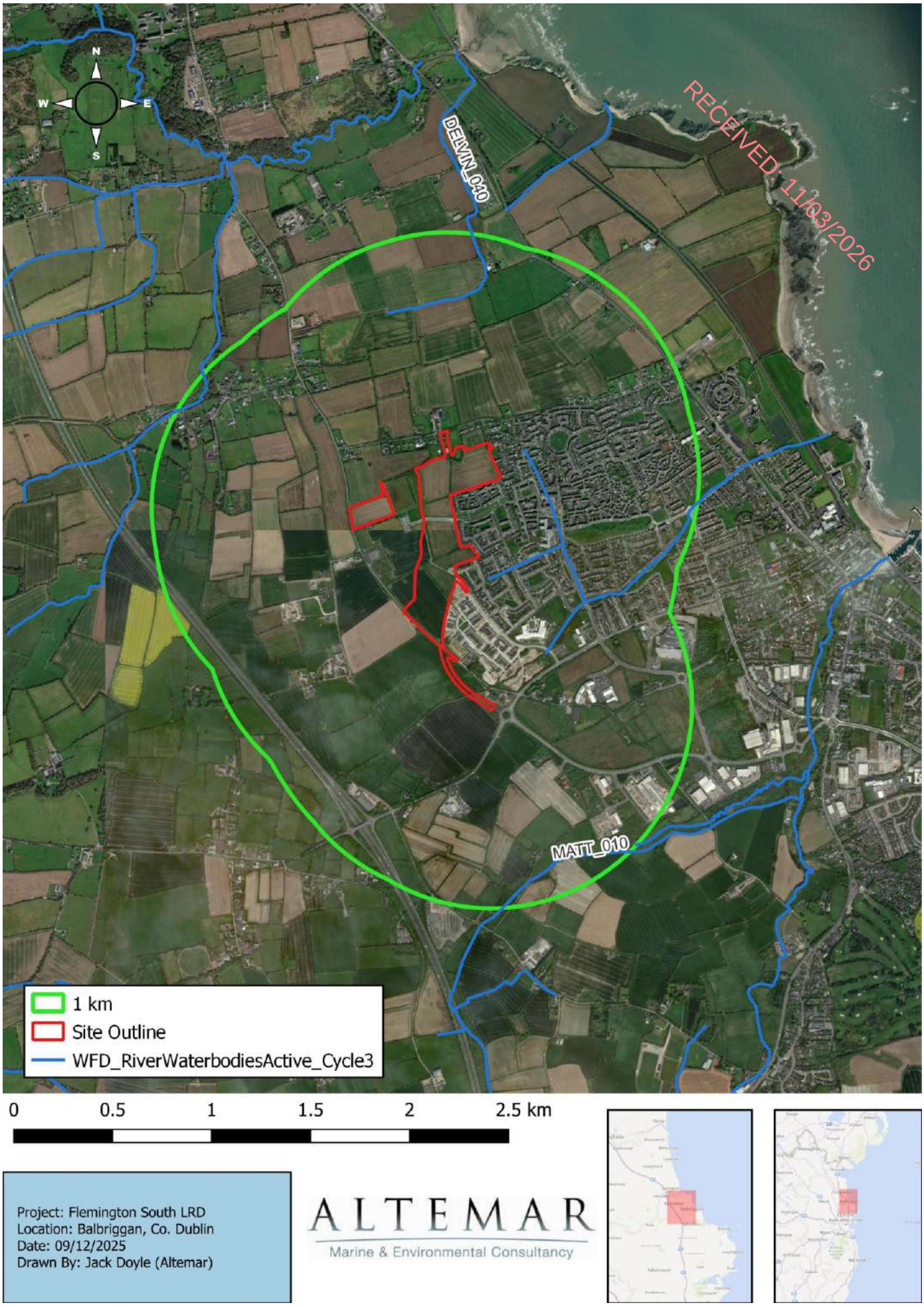

Figure 10. *Waterbodies within 1km of the subject site*

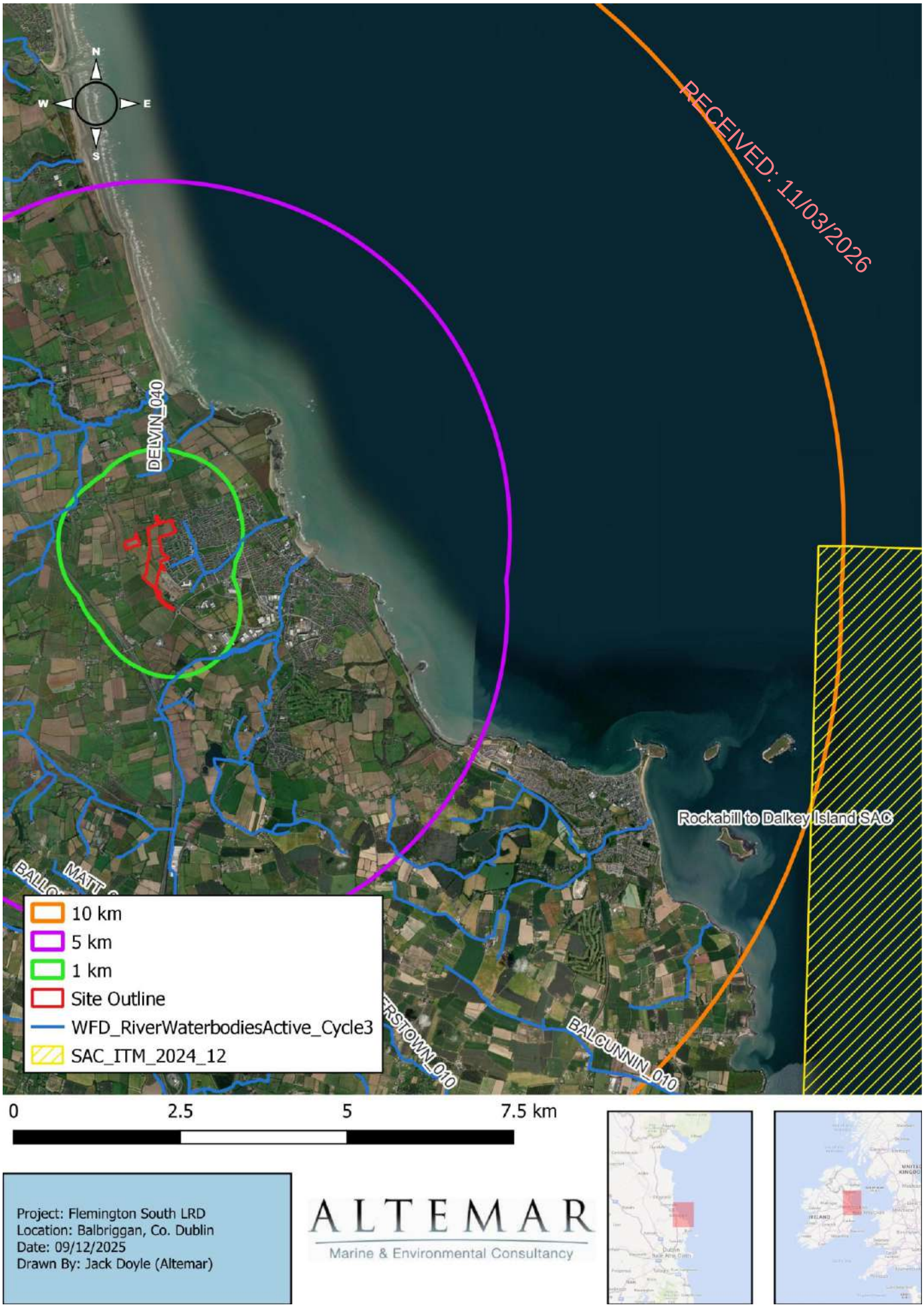

Figure 11. *Waterbodies and SACs located proximate to the subject site*

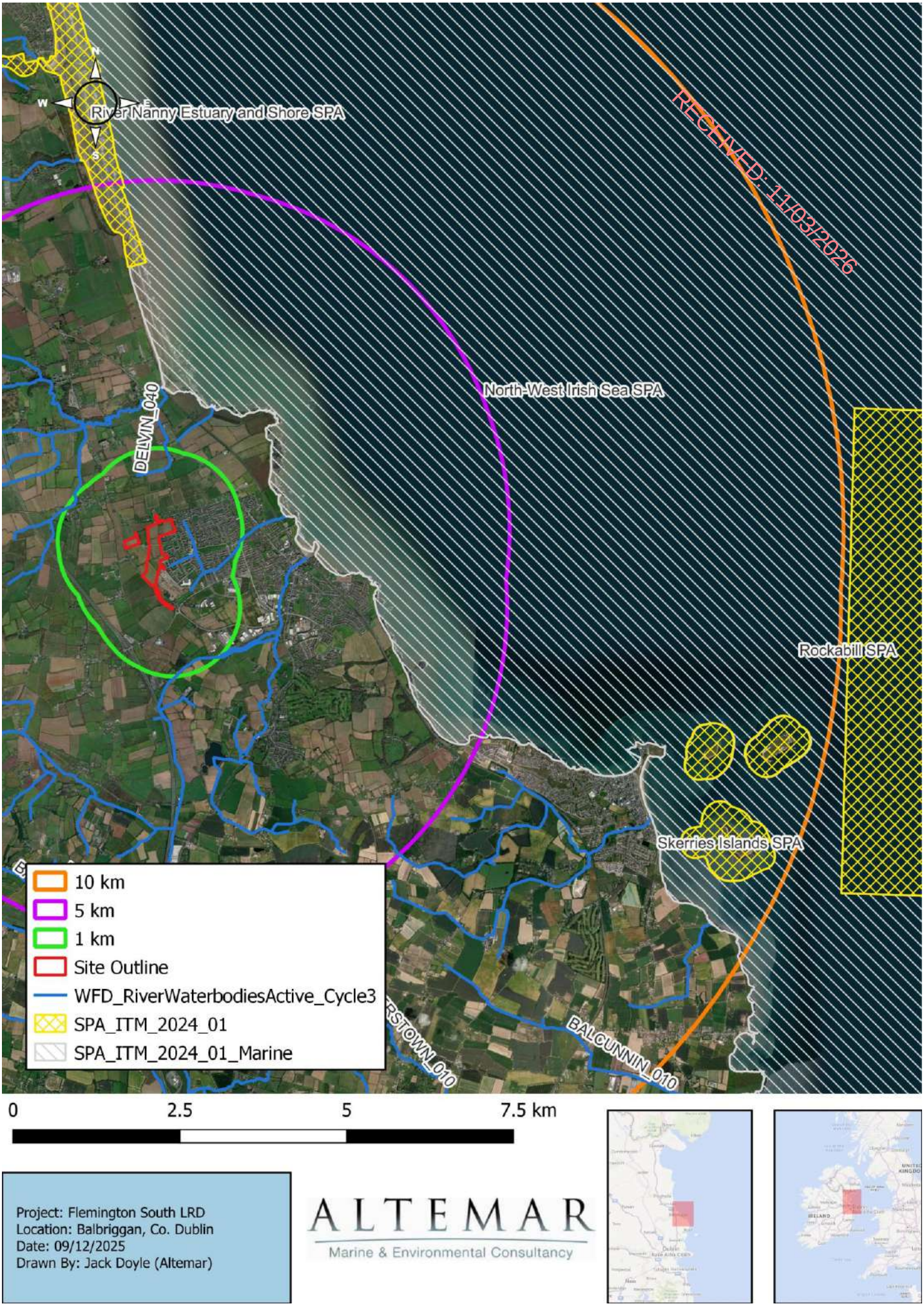

Figure 12. *Waterbodies and SPAs located proximate to the subject site*

4.4 In-Combination Effects

There are several development proposals located in the areas surrounding the subject site. The following is a list of planning application(s) as identified on the Department of Housing, Local Government and Heritage's 'National Planning Application Database' portal. This list has been revised in Response to Item 1(a) of the RFI. :

Table 3. In-combination effects considered

Ref:	Location	Description
LRD0048/S3E (ABP-321437-24)	Townlands of Clonard or Folkstown Great and Clogheder, Balbriggan, Co. Dublin	Large-scale residential development (LRD): Construction of 197 dwellings with all associated site works (Phase 4).
F24A/0871	Sweetmans Yard, Folkstown Great, Balbriggan, Co. Dublin	Retention of change of use and subdivision to commercial / storage use. Retention of units and all associated works.
F23A/0634	Stephenstown Business Park, Stephenstown, Balbriggan, County Dublin, K32X996	Permission for development at the existing waste recovery facility located at Stephenstown Business Park, Stephenstown, Balbriggan, County Dublin, K32X996. The development will consist of: (i) An increase in the total annual waste intake to 95,500 tonnes per annum for recovery; (ii) Revision of operating hours to include public holidays; (iii) Ancillary works comprising a covered bicycle store (6 no. spaces) and reconfiguration of the existing car parking area (7 no. car spaces and 1 no. motorcycle space) to include an electric vehicle charging point and associated underground cable ducting. The development will comprise an activity requiring a review of the existing Industrial Emissions licence (EPA reference no. P1014-01).
F22A/0480	Stephenstown Industrial Estate, Balbriggan, Dublin	The development will principally comprise the construction of a two-storey warehouse unit with ancillary office and staff facilities and associated development as well as a single storey garage. The warehouse unit will have a maximum height of 14.78 metres with a gross floor area of 1,996 sq m including warehouse area (1,670 sq m), ancillary staff facilities (184 sq m) and ancillary office area (142 sq m). The garage will have a maximum height of 14.358 metres and a gross floor area of 500sq m. Final Grant 5th April 2023.
F22A/0033	Lands at Harvest Lodge, Folkstown Lane (Folkstown Little Td) and lands at Folkstown Great Td, Naul Road, Balbriggan, Co Dublin.	The development will consist of a distillery (total floor area of floor area 5659m2) which includes provision of an ancillary visitor centre, storage shed along with associated external plant. Final Grant 10th February 2023
F23A/0075	Bremore Pastures, Balbriggan, Co. Dublin	Permission for the construction of 4no. two storey terraced 3 bedroom dwellings, rear garden areas, boundary walls, connections to existing services and all associated site development works at Bremore Pastures, Balbriggan, County Dublin.
F22A/0670	(on lands of c. 6.29 ha.) relating to: 'Phase 3' to be known as 'Ladywell', within the townlands of, 'Clonard or Folkstown Great', 'Clogheder' & 'Flemingtown Balbriggan, Co. Dublin	The development will consist of Phase 3C as well as roads, services and public open space relating to the overall Phase 3 Ladywell lands as follows: A) 75 no. dwellings comprising 68 no. houses consisting of 22 no. 2 bedroom dwellings (House Types E1, E2, E4, E6, E7, E8, E9, G1, G2, G3, G4, G5], 41 no. 3 bedroom dwellings (House Types D1, D2, F1, F2, F3, F4, F4A, F5, F5A, N1, N2, N3], 2 no. 4 bedroom detached dwellings (house type M1] - all 2-storey), & 3 no. 5 bedroom detached dwellings [House Type K1 - 2.5 storeys - 3 floors), (in a mixture of semi-detached, terraced, end of terrace and detached units); all with associated private open space; B) 7 no. 1 bedroom apartment units consisting of 3 no. 1 bedroom triplex units (T1, T2, T3] in a 3-storey building, 4 no. 1 bedroom Maisonettes [Apartment Types P1 & P2] in 2 no. 2-storey buildings, (all with private open space); provision of single storey cycle parking; bin stores; and ESB substations, solar panels on roofs; as well as 238 no. surface car parking spaces; C) Public Open Space of c. 1.34 hectares (Phase 3C -c. 0.38 ha), (with additional 0.48 hectares of incidental open space) as well as communal (c. 0.06 ha) and private open space; all associated landscaping and drainage works (including attenuation] with public lighting, planting and boundary treatments, including regrading/reprofiling of site where required; D) Provision of Class 1 Public Open Space (c. 0.65 hectares), with play equipment (accessed from Hamlet Lane) located to the west of Bremore Pastures and Hastings Lawn, south of Flemington

Ref:	Location	Description
		Lane, [proposal includes alterations to part of the Class 1 public park and associated works approved under Reg. Ref. F15A/0550]; E) Provision of roads and services infrastructure (surface water, foul and water supply) to facilitate the development of the remainder of Phase 3 lands (Phases 3A, 3B & 3D) including public lighting, SuDS drainage and services infrastructure, as well as vehicular and pedestrian connections to the 'Boulevard Road' and all associated landscaping and ancillary site development works; F) Signalised upgrade of the junction of Boulevard Road and the Clonard Road (R122) as well as pedestrian crossings along Boulevard Road;
F22A/0526	Phase 3 to be known as 'Ladywell' within the townlands of Clonard or Folkstown Great, Clogheder & Flemington, Balbriggan, Co. Dublin	Development (on lands of c. 6.70 ha) relating to: 'Phase 3' to beknown as 'Ladywell' within the townlands of Clonard or Folkstown Great, Clogheder & Flemingtown, Balbriggan, Co. Dublin. (Phase 3 lands bounded generally by undeveloped lands to the north, undeveloped lands to the south, Boulevard Road to the east, and undeveloped lands to the west (to the rear of local road L1130). The proposal includes a separate site of Class 1 Public open Space of c. 0.65 hectares in the adjoining townland of Flemington to the north (accessed from Hamlet Lane, Bremore Pastures Drive, Balbriggan). The development will consist of Phase 3B as well as roads, services and public space relating to the overall Phase 3 Ladywell lands as follows: A) 95 no. dwellings comprising 79 no. 2-storey houses consisting of 20 no 2 bedroom dwellings (House Types E1, E1A, E2, E4, E5, E6), 59 no. 3 bedroom dwellings (House Types D1, D1A, D2, D2A, F1, F1A, F2, F3, F4, F5, F6) all with associated private open space (in a mixture of semi-detached, terraced and detached units), 16 no. 1 bedroom Maisonettes (Apartment Types P1, P1A & P2, P2A), all with private open space; in 4 no. 2 storey building, single storey cycle parking; bin stores; and ESB substations, solar panels on roofs; as well as 305 no. surface car parking spaces; B) Public Open Space of c. 1.34 hectares, (with additional 0.48 hectares of incidental open space along riparian corridor) as well as communal and private open space; all associated landscaping and drainage works (including attenuation) with public lighting, planting and boundary treatments, including regrading/re-profiling of site where required; C) Provision of Class 1 Public Open Space (c. 0.65 hectares), with play equipment (accessed from Hamlet Lane) located to the west of Bremore Pastures and Hastings Lawn, south of Flemington Lane, (proposal includes alterations to part of the Class 1 public park and associated works approved under Reg. Ref. F15A/0550); D) Provision of roads and services infrastructure (surface water, foul and water supply) to facilitate the development of the remainder of Phase 3 lands (Phases 3A, 3C & 3D) including public lighting, SuDS drainage and services infrastructure, as well as vehicular and pedestrian connections to the "Boulevard Road" and all associated landscaping and ancillary site development works; E) Signalised upgrade of the junction of Boulevard Road and the Clonard Road (R122) as well as pedestrian crossings along Boulevard Road;
F21A/0055	Phase 3 to be known as 'Ladywell' within the townlands of Clonard or Folkstown Great, Clogheder & Flemington, Balbriggan, Co. Dublin	The development will consist of Phase 3A as well as roads, services and public space relating to the overall Phase 3 Ladywell Masterplan lands as follows: A) 99 no. dwellings comprising 73 no. 2-storey houses consisting of 24 no. 2 bedroom dwellings [House Types E1, E2, E3, E4), 44 no. 3 bedroom dwellings (House Types B1, B2,B3, D1, D3, F1, F2, F3, F4, F5] & 5 no. 4 bedroom dwellings [House Types M1 & M2]), all with private open space; 16 no. duplex apartments (8 no. 2 bedroom [Types X1, X3] and 8 no. 3 bedroom units [Types X2, X4) in a 3 storey duplex building (including terraces at first floor level, single storey refuse storage building and cycle parking); 6 no. 1 bedroom 'triplex' apartments [Types T1, T2, T3] with balconies at first and second storey levels in 2 no. 3 storey buildings along with a single storey bicycle store & 4 no. 1 bedroom 'maisonette' apartments in 2 no 2 storey buildings (Types P1 & P2]) & bin stores as well as 172 no. car parking spaces; B) Public Open Space of c. 1 hectare, (with additional 0.27 hectares of open space along riparian corridor) as well as communal and private open space; all associated landscaping and drainage works (including attenuation) with public lighting, planting and boundary treatments, including regrading/re-profiling of site (and ditches] where required; C) Provision of Class 1 Public Open Space (c. 0.65 hectares), with play equipment (accessed from Hamlet Lane) located to the west of Bremore Pastures and Hastings Lawn, south of Flemington Lane, (proposal includes alterations to part of the Class 1 public park and associated works approved under Reg. Ref. F15A/0550]; D) Provision of roads and services infrastructure (surface water, foul and water supply) to facilitate the future development of Phase 3 lands (Phases 3B-3D) including public lighting, Suds drainage and services infrastructure, as well as vehicular and pedestrian connections to the 'Boulevard Road' and all associated landscaping and ancillary site development works; E) Signalised upgrade of the junction of Boulevard Road and the Clonard Road (R122) as well as pedestrian crossings along Boulevard Road;
ABP 313210-22 SHD		On the 23rd of March 2023, ACP granted a 10-year permission to the Land Development Agency for development comprising inter alia the construction of 817 no. residential units (377 no. houses, 440 no. apartments), childcare facilities and associated site works, subject to 30 no. standard conditions.

Ref:	Location	Description
FCC Planning Reg. Ref. F21A/0576 & ABP Ref: 312529-22	Castlelands, Balbriggan	An application for the Advance Infrastructure was submitted to FCC in October 2021 under FCC Reg. Ref. F21A/0576. A decision to grant permission was made by FCC 14th December 2021 and confirmed by ACP on the 8th of November 2022.
F24A.1069E ACP-322977-25	Stephenstown Industrial Estate	Demolition of existing 2 no. storey building on site (c. 1,070 sqm), the construction of a 2 no. storey discount retail store with off-licence use (c. 2,448 sqm gross floor area) c. 1,356 sqm net retail floor area.
An Coimisiún Pleanála - Case reference: PL06F.304673 Planning Authority Case Reference: F19A/0131	Balbriggan Community College, Pine Ridge, Chapel St., Balbriggan, Co. Dublin.	Demolition of existing school and construction of new 3 storey Post Primary School & single storey Special Education Needs Unit. Granted 20/09/2019
An Coimisiún Pleanála - Case reference: OA29N.319866	Located off the coast of Counties Dublin, Meath and Louth	Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm.
An Coimisiún Pleanála - Case reference: NA29N.320164	Dublin City Centre and Drogheda, located in counties Dublin, Meath and Louth	DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch. ACP Decision Make Railway Order with conditions. Date signed 19/08/2025.

An analysis of permitted developments, and developments that are currently under construction, within the vicinity of the proposed development site was undertaken to identify potential in-combination effects. The wider area beyond the site boundary is suburban / agricultural and consists primarily of artificial surfaces and highly modified habitats. The reviewed developments are of a similar nature and are subject to standard planning controls and procedures, including the implementation of SuDS measures (including petrol interceptors) and construction phase pollution control measures. With these measures, along with the proposed SuDS measures within the proposed development, residual effects on designated Natura 2000 Sites are predicted to be neutral and not significant.

Following an analysis of development proposals proximate to the subject site, it is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. It is concluded that no significant effects on Natura 2000 sites are likely as a result of the proposed development in combination with other projects. No in combination effects are foreseen.

No projects in the vicinity of the proposed development would be seen to have a significant in combination effect on Natura 2000 sites.

4.5 AA Screening Conclusions

An initial screening of the proposed works, using the precautionary principle (without the use of any mitigation measures) and the Source/Pathway/Receptor links between the proposed works and Natura 2000 sites with the potential to result in significant effects on the conservation objectives and qualifying interests of the Natura 2000 sites was carried out in Table 2. Based on best scientific knowledge and objective information and assessment, the possibility of significant effects caused by the proposed project was excluded for the following Natura 2000 sites:

Special Areas of Conservation

Rockabill to Dalkey Islands SAC
Boyne Coast and Estuary SAC
Rogerstown Estuary SAC
River Boyne and River Blackwater SAC
Malahide Estuary SAC

Special Protection Areas

River Nanny Estuary and Shore SPA
Skerries Islands SPA
Rockabill SPA
Rogerstown Estuary SPA
Boyne Estuary SPA
Malahide Estuary SPA

The project is limited in scale and extent, and the potential zone of influence is restricted to the immediate vicinity of the proposed development. However, in the absence of mitigation measures there is potential for silt laden material and contaminated surface water drainage to enter proximate public surface water networks, the Clonard Brook Stream, Bremore Stream, and the North-West Irish Sea SPA located downstream of the works.

A number of wintering bird assessments were carried out onsite (Appendices I & II). As detailed in Appendices I & II, the site is not of significance to wintering birds and is not an ex-situ site for wintering birds for proximate SPAs including North-West Irish Sea SPA.

An NIS is required in respect of the effects of the project on North-West Irish Sea SPA because it cannot be excluded on the basis of best objective scientific information following screening, in the absence of control or mitigation measures in relation to pollution (silt, dust, pollution and runoff) during construction and operation, that the plan or project, individually and/or in combination with other plans or projects, will have a significant effect on the named European Site/s.

An NIS or Stage 2 Appropriate Assessment is not required for the effects of the project on all other listed Natura 2000 sites above because it can be excluded on the basis of the best objective scientific information following screening that the plan or project, individually and/or in combination with other plans or projects, will have a significant effect on the European Site/s.

NIS is required due to the potential for significant effects on the North-West Irish Sea SPA in the absence of mitigation.

5. Further Information on European Site Screened in for NIS

5.1 North-west Irish Sea SPA 004236

As outlined in the North-west Irish Sea Synopsis[3] (NPWS, version date 17.7.2023)

"*The North-west Irish Sea cSPA constitutes an important resource for marine birds. The estuaries and bays that open into it along with connecting coastal stretches of intertidal and shallow subtidal habitats, provide safe feeding and roosting habitats for waterbirds throughout the winter and migration periods. These areas, along with more pelagic marine waters further offshore, provide additional supporting habitats (for foraging and other maintenance behaviours) for those seabirds that breed at colonies on the north-west Irish Sea's islands and coastal headlands. These marine areas are also important for seabirds outside the breeding period.*

This SPA extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km2 in area. This SPA is ecologically connected to several existing SPAs in this area.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Common Scoter, Red-throated Diver, Great Northern Diver, Fulmar, Manx Shearwater, Shag, Cormorant, Little Gull, Kittiwake, Black-headed Gull, Common Gull, Lesser Black-backed Gull, Herring Gull, Great Black-backed Gull, Little Tern, Roseate Tern, Common Tern, Arctic Tern, Puffin, Razorbill and Guillemot.

The breeding seabird species listed for those SPAs, which abut the North-West Irish Sea SPA are: Fulmar (Lambay Island SPA); Cormorant (Skerries Island SPA; Ireland's Eye SPA; Lambay Island SPA); Shag (Skerries Island SPA; Lambay Island SPA); Lesser Black-backed Gull (Lambay Island SPA); Herring Gull (Skerries Island SPA; Ireland's Eye SPA; Lambay Island SPA); Kittiwake (Lambay Island SPA; Ireland's Eye SPA; Howth Head SPA); Roseate Tern (Rockabill SPA); Common Tern (Rockabill SPA;); Arctic Tern (Rockabill SPA); Little Tern (Boyne Estuary SPA); Guillemot (Lambay Island SPA, Ireland's Eye SPA); Razorbill (Lambay Island SPA, Ireland's Eye SPA); and Puffin (Lambay Island SPA). The Common Tern population that is listed for the nearby South Dublin Bay and River Tolka Estuary SPA is also likely to use this SPA as a foraging resource.

Informed by two surveys of the western Irish Sea region in 2016 an estimated 120,232 and 34,626 individual marine birds occurred in this SPA during autumn and winter respectively. Those marine bird species whose estimated abundances equalled or exceeded 1% of the total estimated size of the winter assemblage are: Red-throated Diver (538), Fulmar (506), Little Gull (391), Kittiwake (944), Black-headed Gull (508), Common Gull (2,866), Herring Gull (6,893), Great Black-backed Gull (2,096), Razorbill (4,638) and Guillemot (13,914).

The estimated 2016 summer abundance of Manx Shearwater in the North West Irish Sea SPA is 13,010 and is of international importance. The estimated 2016 autumn and winter abundances of Great Northern Diver in the North West Irish Sea SPA is 248 and 230 respectively and are of international importance. The estimated abundances of Common Scoter over parts of this SPA can reach significant numbers (e.g. 14,567 in December 2018) which is also of international importance."

[3] https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY004236.pdf

5.1.1 Conservation Objectives of North-west Irish Sea SPA 004236 (All Habitats and Species)

The qualifying interests, their attributes, and targets of each of the qualifying interest of North-west Irish Sea SPA [004236] are seen in Table 4.

Table 4. The site-specific Conservation Objectives and overall status of species and habitats of North-west Irish Sea SPA.

Annex Species/Habitats-Qualifying Interest	**Overall Conservation Status**	**Site Specific Conservation Objectives, attributes and targets**
Common Scoter (*Melanitta nigra*) [A065] Red-throated Diver (*Gavia stellata*) [A001] Great Northern Diver (*Gavia immer*) [A003] Fulmar (*Fulmarus glacialis*) [A009] Manx Shearwater (*Puffinus puffinus*) [A013] Cormorant (*Phalacrocorax carbo*) [A017] Little Tern (*Sterna albifrons*) [A195] Kittiwake (*Rissa tridactyla*) [A188] Black-headed Gull (*Chroicocephalus ridibundus*) [A179] Common Gull (*Larus canus*) [A182] Lesser Black-backed Gull (*Larus fuscus*) [A183] Herring Gull (*Larus argentatus*) [A184] Roseate Tern (*Sterna dougallii*) [A192] Arctic Tern (*Sterna paradisaea*) [A194] Puffin (*Fratercula arctica*) [A204] Razorbill (*Alca torda*) [A200] Guillemot (*Uria aalge*) [A199] Little Gull (*Hydrocoloeus minutus*) (A862) Common Tern (*Sterna hirundo*) (A193)	**[A065]** Red; **[A001]** Amber; **[A003]** Amber; **[A009]** Amber; **[A013]** Amber; **[A017]** Amber; **[A195]** Amber; **[A188]** Red; **[A179]** Amber; **[A182]** Amber; **[A183]** Amber; **[A184]** Amber; **[A192]** Amber; **[A194]** Amber; **[A204]** Red; **[A200]** Amber; **[A199]** Amber; **[A862]** Amber; **[A193]** Amber;	**To maintain the favourable conservation condition of the qualifying interests in North-west Irish Sea SPA, which is defined by the following list of attributes and targets:** *(Attribute.* Target) *Population Size.* Long term SPA population trend is stable or increasing *Spatial Distribution.* Sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population *Forage spatial distribution, extent, abundance and availability.* Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target *Disturbance across the site*. 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. *Barriers to connectivity.* 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.

6. Analysis of the Potential Impacts on Natura 2000 Sites.

The proposed development is not within a designated conservation site. The nearest Natura 2000 site is the North-West Irish Sea SPA (1.5 km). Out of an abundance of caution, given the scale of the proposed development, the nature of the proposed works, the proximity of the subject site to the Clonard Brook Stream and Bremore Stream, and the fact that the North-West Irish Sea SPA is located immediately downstream of the Bremore Stream, it is considered that, in the absence of mitigation, there is the potential for silt and contaminated surface water runoff to enter existing public surface water networks, the Clonard Brook Stream and Bremore Stream and potentially give rise to significant effects on the North-West Irish Sea SPA.

The potential effects on the North-West Irish Sea SPA are seen in Table 5. The proposed clearance and construction works would impact on the existing ecology of the site and the surrounding area. In the absence of mitigation, this could lead to the transportation of dust, silt, and contaminated surface water runoff to the proximate the Clonard Brook Stream and Bremore Stream with the potential for effects on the North-West Irish Sea SPA.

Construction and operational phase mitigation measures are required on site particularly as clearance of the site is proposed which will remove all existing terrestrial habitats and, in the absence of mitigation, would lead to silt laden and contaminated runoff entering the existing arterial drainage network currently servicing the existing housing estate to the east of the site, the Clonard Brook Stream, Bremore Stream, and the marine environment. Mitigation measures are required.

7. Mitigation Measures

Construction and operational mitigation will be incorporated into the proposed development project to minimise the potential negative impacts within the Zone of Influence (ZoI) including the the Clonard Brook Stream, Bremore Stream and downstream North-West Irish Sea SPA (Table 6).

The mitigation measures outlined in Table 6 are considered by Altemar to be appropriate to the protection of the downstream North-West Irish Sea SPA. The primary vector for potential impacts on the North-West Irish Sea SPA is via dust, silt, and contaminated surface water runoff to proximate surface water networks and watercourses during construction and operation. As a result, site-wide mitigation measures designed to prevent dust, silt, and contaminated surface water runoff entering proximate surface water networks and watercourses during construction and operation are considered relevant to the protection of the downstream North-West Irish Sea SPA. Measures relating to the control of dust, silt, and contaminated runoff outlined within the CEMP, Chapter 4 of the accompanying EIAR, and mitigation devised by Altemar are considered appropriate to protect the integrity of the downstream North-West Irish Sea SPA.

~~For the purposes of clarity~~In Response to Item 1(b) of the RFI, Table 6 (below) has been updated to highlight mitigation measures which are particularly relevant to the protection of North-West Irish Sea SPA. However, as outlined above, general measures outlined in the CEMP and Biodiversity Chapter (Ch. 4 of EIAR) are considered relevant to ensure the prevention of silt, dust, and contaminated surface water runoff entering proximate networks and watercourses which, ultimately, hydrologically link the proposed development site to North-West Irish Sea SPA.

Table 5. Potential for adverse effects on the qualifying interests and conservation objectives of European sites		
European Site & Site Code	Qualifying Interests	Potential for Adverse Effects
North-West Irish Sea SPA	Common Scoter (*Melanitta nigra*) [A065] Red-throated Diver (*Gavia stellata*) [A001] Great Northern Diver (*Gavia immer*) [A003] Fulmar (*Fulmarus glacialis*) [A009] Manx Shearwater (*Puffinus puffinus*) [A013] Shag (*Phalacrocorax aristotelis*) [A018] Cormorant (*Phalacrocorax carbo*) [A017] Little Gull (*Larus minutus*) [A177] Kittiwake (*Rissa tridactyla*) [A188] Black-headed Gull (*Chroicocephalus ridibundus*) [A179] Common Gull (*Larus canus*) [A182] Lesser Black-backed Gull (*Larus fuscus*) [A183] Herring Gull (*Larus argentatus*) [A184] Great Black-backed Gull (*Larus marinus*) [A187]	**Construction Impacts** Given the nature of the development, impacts would be expected to be localised in nature restricted to the immediate vicinity of the site. There is a potential for downstream impacts if significant quantities of pollution or silt were introduced into the onsite drainage network with potential for downstream impacts on North-West Irish Sea SPA. Site works have the potential for downstream impacts on aquatic biodiversity through the introduction of silt, dust, contamination and petrochemicals. The storage of topsoil or works onsite could lead to dust, soil or silt laden runoff entering the marine environment. The mitigation measures need to take into account the potential impact from pluvial flooding, silt, dust (indirectly) and potential for contaminated material or pollutants from site. Contaminated surface water runoff on site during construction may lead to silt or contaminated materials from site entering the onsite surface water network with downstream impacts on the SPA. If on-site concrete production is required or cement works are carried out there is potential for contamination of the marine environment. The use of plant and machinery, as well as the associated temporary storage of construction materials, oils, fuels and chemicals could lead to pollution on site or in the marine environment. Impacts on the SPA from upstream sources have the potential to directly impact on the qualifying interests of the SPA in the absence of mitigation measures. In the absence of mitigation measures, there is the potential to impact on the distribution number and range of the following qualifying interests. • Common Scoter (*Melanitta nigra*) [A065] • Red-throated Diver (*Gavia stellata*) [A001] • Great Northern Diver (*Gavia immer*) [A003] • Fulmar (*Fulmarus glacialis*) [A009] • Manx Shearwater (*Puffinus puffinus*) [A013] • Shag (*Phalacrocorax aristotelis*) [A018] • Cormorant (*Phalacrocorax carbo*) [A017] • Little Gull (*Larus minutus*) [A177] • Kittiwake (*Rissa tridactyla*) [A188] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Common Gull (*Larus canus*) [A182] • Lesser Black-backed Gull (*Larus fuscus*) [A183] • Herring Gull (*Larus argentatus*) [A184] • Great Black-backed Gull (*Larus marinus*) [A187] • Little Tern (*Sterna albifrons*) [A195] • Roseate Tern (*Sterna dougallii*) [A192]

Table 5. Potential for adverse effects on the qualifying interests and conservation objectives of European sites		
European Site & Site Code	Qualifying Interests	Potential for Adverse Effects
	Little Tern (*Sterna albifrons*) [A195] Roseate Tern (*Sterna dougallii*) [A192] Common Tern (*Sterna hirundo*) [A193] Arctic Tern (*Sterna paradisaea*) [A194] Puffin (*Fratercula arctica*) [A204] Razorbill (*Alca torda*) [A200] Guillemot (*Uria aalge*) [A199]	• Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Puffin (*Fratercula arctica*) [A204] • Razorbill (*Alca torda*) [A200] • Guillemot (*Uria aalge*) [A199] The proposed development site is not an ex-situ foraging site for the qualifying interests of this site (Appendix I & II). Further, given the minimum distance to this SPA (1.5 km), no significant noise or vibration impacts on the qualifying interests of this SPA are foreseen. In the absence of mitigation measures, no significant adverse effects on the integrity of this SPA are foreseen via noise/vibration impacts or impacts on foraging activity of bird species protected as QIs of this SPA. **Operational Impacts** This SPA is located in the subtidal environment. It would be expected that the noise levels from the proposed operation and the presence of people as a result of the development will not impact on the conservation objectives of this subtidal SPA. The development must comply with standard drainage requirements and the Water Pollution Acts to ensure that silt, dust (indirect) and pollution are intercepted prior to reaching designated sites. Any increase in disturbance to this SPA is not deemed to be significant given the distance and subtidal nature of the site. Out of an abundance of caution, in the absence of mitigation measures there is the potential to effect the distribution number and range of the following qualifying interests in the absence of mitigation measures (pollution control): • Common Scoter (*Melanitta nigra*) [A065] • Red-throated Diver (*Gavia stellata*) [A001] • Great Northern Diver (*Gavia immer*) [A003] • Fulmar (*Fulmarus glacialis*) [A009] • Manx Shearwater (*Puffinus puffinus*) [A013] • Shag (*Phalacrocorax aristotelis*) [A018] • Cormorant (*Phalacrocorax carbo*) [A017] • Little Gull (*Larus minutus*) [A177] • Kittiwake (*Rissa tridactyla*) [A188] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Common Gull (*Larus canus*) [A182] • Lesser Black-backed Gull (*Larus fuscus*) [A183] • Herring Gull (*Larus argentatus*) [A184] • Great Black-backed Gull (*Larus marinus*) [A187]

Table 5. Potential for adverse effects on the qualifying interests and conservation objectives of European sites		
European Site & Site Code	Qualifying Interests	Potential for Adverse Effects
		• Little Tern (*Sterna albifrons*) [A195] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Puffin (*Fratercula arctica*) [A204] • Razorbill (*Alca torda*) [A200] • Guillemot (*Uria aalge*) [A199] Mitigation measures are required to remove the potential of impacts on the SPA from indirect pathways via the drainage network during operation.

***Table 6**. Mitigation measures (less relevant mitigation measures struck-through below)*

Sensitive Receptors	Potential Impacts on SPA	Mitigation Measures to Prevent Impacts on North-West Irish Sea SPA
North-West Irish Sea SPA Clonard Brook Stream Bremore Stream	• Habitat degradation • Dust deposition • Pollution • Silt ingress from site runoff • Downstream impacts • Negative impacts on the aquatic environment, aquatic species and qualifying interests.	**Construction Phase** **As outlined in the accompanying Construction Environmental Management Plan prepared by Paul McGrail Consulting Engineers, the following mitigation will be carried out to prevent downstream impacts:** ~~***'7.3 ENVIRONMENTAL, EMERGENCY, FIRE AND ACCIDENT PROCEDURE***~~ ~~*Measures will be carried out to avoid environmental incidents, however if these occur then the following types must be reported to the responsible person in the construction team as per the Glenveagh Accident and Emergency Procedure.*~~ ~~*The overall strategy in the event of a spillage will be to "Stop-Contain-Notify" in the event of:*~~ ~~• *Spills or discharge to the atmosphere, water supplies, sewage systems, rivers and other watercourses, or to the ground :*~~ ~~• *Any chemical products*~~ ~~• *Oils or fuels*~~ ~~• *Effluent/fumes and gases*~~ ~~• *Waste or contaminated materials*~~ ~~• *Damage to existing:*~~ ~~• *Trees and wildlife*~~ ~~• *Flora and existing local habitats*~~ ~~• *Any environmental incidents that could lead to:*~~ ~~• *Local Authority or regulatory enforcement*~~ ~~• *Public complaint'*~~ ~~***'7.6 CONSTRUCTION PLANT***~~ ~~*Construction plant can be a significant source of emission although control measures can be implemented to minimise any adverse impacts. The following measures will be employed:*~~ ~~• *Site plant and equipment will be serviced regularly and maintained in good condition and in accordance with the manufacture's specifications. Allowing for economic constraints, the plant will be selected on the basis of which has the least potential for dust and emissions*~~ ~~• *Plant will not be left running when not in use.*~~ ~~• *Plant with dust suppression equipment will be used where practicable.*~~ ***7.7 VEHICLE MOVEMENTS*** *Vehicle movement may result in dust emissions and exhaust emissions. However, a number of control measures can be adopted to eliminate or minimise such emissions:*

Sensitive Receptors	Potential Impacts on SPA	Mitigation Measures to Prevent Impacts on North-West Irish Sea SPA
		• *Damping down the site haul roads during prolonged dry periods.* • *Regular cleaning of hard surfaces at the site entrance.* • *Ensuring that materials are transported appropriately (sheeting used over dusty materials)* • *Confinement of plant and machinery to designated haul routes on site. Haul routes will be outside areas of high groundwater vulnerability.* • *Speed restrictions on site will be enforced (15 km/h).* • *Hoarding to site boundaries where practical which will aid in the reduction of windblown dust-off site.* ***7.8 DUST*** *Dust control will be best achieved at sources, and if possible, activities will be carried out in a manner as to preclude dust generation.* *If dust is generated, steps will be taken to protect workers in the vicinity who shall, as a minimum, be issued with appropriate dust masks. Dust will, as far as is reasonably practicable, be contained in the area where it was generated. Dust suppression will be carried out to ensure that dust nuisance affecting neighbouring properties is minimised.* *Dust emissions from construction will be controlled through careful pre-project planning and effective site management. The following control measure and good practices, will be employed:* • *Burning of materials is prohibited on site.* • *Loading and unloading will only be permitted in designated areas.* • *Provision of water sprays in dust sensitive locations will be introduced, e.g. concrete cutting.'* ***'7.15 SOILS & CONTAMINATIONS*** ***Operation Control*** ~~*A site-specific Materials Management Plan shall be prepared. Measures to mitigate potential adverse environmental or health and safety effects during construction shall include the following, as appropriate:*~~ ~~• *Identification and assessment of the potential for residual ground contamination to be present prior to the start of any excavation works*~~ ~~• *Minimisation of potential risks to site workers as required by the Safety, Health and Welfare (Construction Regulations) 2013*~~ • *Testing and sampling of excavated soils in order to assess the suitability of materials for re-use on site* • *Dust suppression from any contaminated soils by the regular use of water spray during any dry conditions, sheeting of haulage vehicle loads* • *Stockpiling of contaminated materials will be avoided where possible.* • *Stockpiles will be treated to prevent windblown dust.* • *Adequate drainage will be designed and installed during construction work to manage surface water runoff* • *The handling and storage of any potentially hazardous liquids on site, e.g. fuels and chemicals, will be controlled and best practice guidelines. Storage tanks/container facilities will have appropriate bunding within the designated area*

Sensitive Receptors	Potential Impacts on SPA	Mitigation Measures to Prevent Impacts on North-West Irish Sea SPA
		• *If hazardous liquids escape, remedial action will be taken as soon as possible.* • ~~*Where unforeseen contamination is identified during the course of the work, specific investigations will be carried out in the areas in question and appropriate health and safety procedures will be implemented during the removal of the material'.*~~ ***'9.2 Surface Water Protection Measures*** *Surface water generated during construction shall be managed to prevent sediment, hydrocarbons or cementitious materials entering the drainage network.* *This will include the following actions:* • *No untreated surface water shall be discharged from the site.* • *Temporary drainage infrastructure shall be installed prior to commencement of bulk earthworks.* • *Silt fences, sediment traps and/or settlement measures shall be installed where required.* • *Early construction of sediment management basins shall be undertaken where practicable.* • *Runoff shall be directed away from drainage inlets and surface water gullies.* • *All drainage inlets shall be protected during construction.* • *Stockpiles shall be located away from drainage paths and protected from erosion.* • *Exposed soils shall be stabilised as soon as practicable.* • *Surfaces intended to enable infiltration shall be protected from compaction.* • *Compacted subsoil shall be broken up prior to reinstatement to restore infiltration capacity.'* **As outlined in Chapter 4. Biodiversity of the accompanying EIAR, the following mitigation will be carried out to prevent significant impacts:** **<u>Construction Phase</u>** • *'A project ecologist will be appointed to oversee all works.* • *Onsite drains and drainage ditches will be protected from dust, silt and surface water throughout the works.* • *Local silt traps established throughout site.* • *Mitigation measures on site include dust control, stockpiling away from drains and drainage ditches.* • *Stockpiling of loose materials will be kept to a minimum of 40m from drains and drainage ditches.* • *Stockpiles and runoff areas following clearance will have suitable barriers to prevent runoff of fines into the drainage system.* • *Fuel, oil and chemical storage will be sited within a bunded area. The bund will be at least 50m away from drains, drainage ditches, excavations and other locations where it may cause pollution.* • *Bunds will be kept clean and spills within the bund area will be cleaned immediately to prevent groundwater contamination. Any water-filled excavations, including the attenuation tank during construction, that require pumping will not directly discharge to the surface water*

Sensitive Receptors	Potential Impacts on SPA	Mitigation Measures to Prevent Impacts on North-West Irish Sea SPA
		drainage network. Prior to discharge of water from excavations adequate filtration will be provided to ensure no deterioration of water quality. • *Petrochemical interception and bunds in refuelling area* • *On-site inspections to be carried out by project ecologist.* • *During the works silt traps will be put in place to prevent downstream impacts. Maintenance of any drainage structures (e.g. de-silting operations) will not result in the release of contaminated water to the surface water network.* • *Prior to site clearance the ecologist and arborist will assess the site works and oversee habitat protection measures.'* **<u>Operational Phase</u>** **As outlined in Chapter 4. Biodiversity of the accompanying EIAR, the following mitigation will be carried out in relation to prevent significant impacts:** • *'A project ecologist will be appointed to oversee completion of all landscape, lighting and drainage works.* • *Petrochemical interception will be inspected by the project ecologist to ensure compliance with Water Pollution Acts.* • *Post Construction assessment/compliance with proposed lighting strategy Mitigation During Operation* • *Mitigation measures will be in place to comply with Water Pollution Acts.'* **Additionally, the following mitigation measures will be implemented:** **<u>Construction Mitigation</u>** **Supervision** An Ecological Clerk of Works will supervise works on site. **Surface Water Control** • No entry of solids to the associated streams or drainage network during the connection of pipework to the public water system • Sufficient onsite cleaning of vehicles prior to leaving the site and on nearby roads, will be carried out, particularly during groundworks. • The Site Manager will be responsible for the pollution prevention programme and will ensure that at least daily checks are carried out to ensure compliance. A record of these checks will be maintained. • The site compound will include a dedicated bund for the storage of dangerous substances including fuels, oils etc. Refuelling of vehicles/machinery will only be carried out within the bunded area. • Concrete trucks, cement mixers or drums/bins are only permitted to wash out in designated wash out area greater than 50m from sensitive receptors including drains. • Spill containment equipment shall be available for use in the event of an emergency. The spill containment equipment shall be replenished if used and shall be checked on a scheduled basis. **Air & Dust** Mitigation measures will be carried out reduce dust emissions to a level that avoids the possibility of adverse effects on biodiversity. The main activities that may give rise to dust emissions during construction include the following: • Excavation of material; • Materials handling and storage;

Sensitive Receptors	Potential Impacts on SPA	Mitigation Measures to Prevent Impacts on North-West Irish Sea SPA
		• Movement of vehicles (particularly HGV's) and mobile plant. • Contaminated surface runoff *Mitigation measures to be in place:* • Trucks leaving the site with excavated material will be covered so as to avoid dust emissions along the haulage routes. • Speed limits on site (15kmh) to reduce dust generation and mobilisation. *Site Management* • Regular inspections of the site and boundary should be carried out to monitor dust, records and notes on these inspections should be logged. • Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Make the complaints log available to the local authority when asked. • Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book. *Monitoring* • Undertake daily on-site and off-site inspection, where receptors are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces within 100 m of site boundary, integrity of the silt control measures, with cleaning and / or repair to be provided if necessary. *Preparing and Maintaining the Site* • Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. • Fully enclose specific operations where there is a high potential for dust production and the site is active for an extensive period. • Avoid site runoff of water or mud. • Keep site fencing, barriers and scaffolding clean using wet methods. • Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below. • Cover, seed or fence stockpiles to prevent wind whipping. • Hard surface roads will be swept to remove mud and aggregate materials from their surface while any un-surfaced roads will be restricted to essential site traffic. • Any road that has the potential to give rise to fugitive dust will be regularly watered, as appropriate, during dry and/or windy conditions. *Operations* • Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems. • Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate. • Use enclosed chutes and conveyors and covered skips.

Sensitive Receptors	Potential Impacts on SPA	Mitigation Measures to Prevent Impacts on North-West Irish Sea SPA
		• Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate. • Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods. *Measures Specific to Earthworks* • Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable. • Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable. • Only remove the cover in small areas during work and not all at once. • During dry and windy periods, and when there is a likelihood of dust nuisance, a bowser will operate to ensure moisture content is high enough to increase the stability of the soil and thus suppress dust. • The Contractor will be required to consult with an ecologist prior to the beginning of works to identify any additional measures that may be appropriate and/or required. *Storage/Use of Materials, Plant & Equipment* • Materials, plant and equipment shall be stored in the proposed site compound location; • All oils, fuels and other hazardous liquid materials shall be clearly labelled and stored in an upright position in an enclosed bunded area within the proposed development site compound. The capacity of the bunded area shall conform with EPA Guidelines – hold 110% of the contents or 110% of the largest container whichever is greater; • Fuel may be stored in the designated bunded area or in fuel bowsers located in the proposed compound location. Fuel bowsers shall be double skinned and equipped with certificates of conformity or integrity tested, in good condition and have no signs of leaks or spillages; • Smaller quantities of fuel may be carried/stored in clearly labelled metal Jeri cans. Green for diesel and red for petrol and mixes. The Jeri cans shall be in good condition and have secure lockable lids. The Jeri cans shall be stored in a drip tray when not in use. • Drip trays will be turned upside down if not in use to prevent the collection of rainwater; **<u>Operational Phase Mitigation</u>** • A project ecologist will be appointed to oversee completion of all landscape and drainage works. • Petrol interceptors will be inspected by the project ecologist to ensure compliance with Water Pollution Acts. • Petrol interceptors will be inspected and maintained as per the manufacturer's specifications

8. Adverse Effects on the conservation objectives of Natura 2000 sites likely to occur from the project (post mitigation)

A robust series of mitigation measures are outlined. These would ensure that surface water runoff from the proposed works site is clean, uncontaminated and that dust from the works would not significantly impact on the Clonard Brook Stream, Bremore Stream and the downstream Natura 2000 site (North-West Irish Sea SPA). It should be noted that the early implementation of ecological supervision on site prior to the initial mobilisation and enabling works will be an important element of the project. This will ensure the implementation of surface water runoff mitigation strategies and the mitigation to protect the watercourse from proximate works from the outset.

With the successful implementation of the mitigation measures to limit surface water impacts on the Clonard Brook Stream and the Bremore Stream, including mitigation/supervision, no significant impacts are foreseen from the construction and operation of the proposed project. Residual impacts of the proposed project will be localised to the immediate vicinity of the proposed works and would not impact on the integrity of the proximate Natura 2000 site.

The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on North-West Irish Sea SPA, through the application of the standard construction and operational phase controls as outlined above. No significant adverse impacts on the conservation objectives of North-West Irish Sea SPA are likely following the implementation of the mitigation measures outlined above.

It is essential that these measures outlined are complied with, to ensure that the proposed development does not have “downstream” environmental impacts. These measures are to protect the surface water, which is the primary vector of impacts from the site, and to ensure that it is not impacted during construction and operation.

9. Conclusion

It has been concluded that significant effects on the North-West Irish Sea SPA are likely from the proposed works in the absence of mitigation measures, primarily as a result of the indirect hydrological connection to the site via surface water drainage. In the absence of mitigation, and out of an abundance of caution, there is the potential for dust, silt, and contaminants to enter proximate surface water drainage networks, the Clonard Brook Stream and Bremore Stream, which in turn outfall to the marine environment and North-West Irish Sea SPA. For this reason, an NIS was carried out to assess whether the proposed project, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European Site. All other Natura 2000 sites were screened out at initial screening.

Construction works will create localised noise disturbance that will not impact on Natura 2000 sites. Mitigation measures will be in place to ensure that there are no significant impacts on the surface water that leads to the marine environment.

A number of wintering bird assessments were carried out onsite (Appendices I & II). As detailed in Appendices I & II, the site is not of significance to wintering birds and is not an ex-situ site for wintering birds for proximate SPAs.

Following the implementation of the mitigation measures outlined, the construction and operation of the proposed development would not be deemed to adversely affect the integrity of the North-West Irish Sea SPA, alone in combination with other plans and projects. No significant adverse effects are likely on all other Natura 2000 sites, in the absence of mitigation, alone in combination with other plans and projects.

This report presents an Appropriate Assessment Screening and NIS for the proposed development. It outlines the information required for the competent authority to screen for appropriate assessment and to determine whether or not the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

On the basis of the content of this report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

No significant effects are likely on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites.

10. Data used for the AA Screening/NIS Assessment

NPWS site synopses and Conservation objectives of sites within 15km were examined. There is no direct pathway to any Natura 2000 sites beyond 15km of the proposed development site. The most recent SAC and SPA boundary shapefiles were downloaded and overlaid on Bing maps and satellite imagery.

11. References

1. Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive – Guidance for Planning Authorities March 2010.
2. Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government 2009; www.npws.ie/publications/archive/NPWS_2009_AA_Guidance.pdf
3. Managing NATURA 2000 Sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC, European Commission 2000; ec.europa.eu/environment/nature/Natura2000/management/docs/art6/provision_of_art6_en.pdf
4. 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; ec.europa.eu/environment/nature/Natura2000management/docs/art6/Natura_2000_assess_en.pdf
5. Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission; ec.europa.eu/environment/nature/Natura2000/management/docs/art6/guidance_art6_4_en.pdf
6. Guidance document on the implementation of the birds and habitats directive in estuaries and coastal zones with particular attention to port development and dredging; ec.europa.eu/environment/nature/Natura2000/management/docs/guidance_doc.pdf
7. The Status of EU Protected Habitats and Species in Ireland. https://www.npws.ie/sites/default/files/publications/pdf/article-17-report-2025-volume-1.pdf
8. NPWS (2013) Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
9. NPWS (2012) Conservation Objectives: Boyne Coast and Estuary SAC 001957. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
10. NPWS (2013) Conservation Objectives: Rogerstown Estuary SAC 000208. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
11. NPWS (2021) Conservation Objectives: River Boyne and River Blackwater SAC 002299. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.
12. NPWS (2013) Conservation Objectives: Malahide Estuary SAC 000205. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
13. NPWS (2012) Conservation Objectives: River Nanny Estuary and Shore SPA 004158. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
14. NPWS (2024) Conservation Objectives: Skerries Islands SPA 004122. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.
15. NPWS (2013) Conservation Objectives: Rockabill SPA 004014. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
16. NPWS (2013) Conservation Objectives: Rogerstown Estuary SPA 004015. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
17. NPWS (2013) Conservation Objectives: Boyne Estuary SPA 004080. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht
18. NPWS (2013) Conservation Objectives: Malahide Estuary SPA 004025. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
19. NPWS (2023) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Appendix Ia - Ornithological Survey of lands at Flemington Lane, Balbriggan, Co. Dublin (February -March 2023)

1. Introduction

Joseph Adamson MCIEEM was appointed by Altemar Ltd. to conduct an ornithological survey of a parcel of land at Flemington Lane, located to the northwest of the town of Balbriggan, Co. Dublin. The purpose of the site visits was to survey the site to record species of birds that are frequenting the area.

2. Survey Area

The survey site, comprising of two parcels of land, lies to the west of a housing estate in an area of Balbriggan known as Flemington. The larger of the two parcels is bounded to the north by agricultural fields, to the south by a new residential housing estate, and to the east by a housing estate in an area of Balbriggan known as Tankardstown. A water treatment plant that serves the town of Balbriggan is located to the west of the site. A new road leading from the Tankardstown housing estate to the entrance to the water treatment plant bisects the site in an east-west direction. A dirt track trends from the south of the site through the centre of the site.

The second parcel is much smaller in size and is comprised of an agricultural field, bounded by a hedgerow to the south of it. This parcel is located west of the larger parcel and to the north of the water treatment plant

The survey site was dominated for the most part by agricultural fields containing Oil Seed Rape (OSR). There are very few hedgerows within the site, and those that are present are in poor condition with wide gaps. The larger parcel of the site was accessed from the south, through a new housing estate. The smaller parcel was accessed from a secondary road that borders the field to the west.

3. Methodology

The site was surveyed on the 27th and 28th February, and the 7th, 18th and 21st March 2023. Weather at the times of survey was suitable for recording, with bright and sunny spells for the most part, with occasional showers on the 18th and 21st March.

All areas within the sight boundary were surveyed by systematically walking and recording birds heard and observed. A list of birds observed during the site visit was then compiled for the entire site (Table 1).

A note was made of any species of conservation interest recorded at the site. Species highlighted in red represent species whose breeding population has declined by 50% over the last 25-30 years. Species highlighted in amber represent species that are of European

Conservation Concern. They are Amber-listed because of their unfavourable conservation status but not concentrated in Europe. The remaining species are Green-listed, species of favourable conservation status (Gilbert, G., Stanbury, A., and Lewis, I.) (Ref.1).

4. Results

Table 1: Bird species recorded within the site during the Winter Bird Survey, 2023, at Flemington Lane, Balbriggan, Co. Dublin

Species	Qualification Criteria	Comments
Common Buzzard *Buteo buteo*		Observed on four occasions throughout the site, usually seen commuting over the fields within the site. There are no suitable trees for breeding within the site.
Herring Gull *Larus argentatus*	SPEC2, BDMp1, BDMp2	Birds were frequently observed over the site due to the proximity of the survey site to the coast.
Woodpigeon *Columba palumbus*		Frequently observed overhead. Likely to breed in mature hedgerows and trees outside of the site.
Meadow Pipit *Anthus pratensis*	SPEC1	Occasionally flushed from the OSR fields. Likely to breed in small numbers within the site.
Pied Wagtail *Motacilla alba yarelli*		Observed along the track that runs in a northerly direction through the site and the new road leading to the water treatment plant.
Wren *Troglodytes troglodytes*		Distantly observed on one occasion. May breed in hedgerows at the north of the site.
Robin *Erithacus rubecula*		One heard singing in residential garden, east of the site.
Fieldfare *Turdus pilaris*		A flock of 15 was observed flying over the site on the 27th of March A Winter visitor to Ireland from Northern and Central Europe. Does not breed.
Blackbird *Turdus merula*		Frequently observed in small numbers within the site on all survey dates. Likely to breed within the site.
Magpie *Pica pica*		Infrequently observed over the site on all survey dates.
Jackdaw *Corvus monedula*		Occasionally observed flying overhead on all survey dates. Likely to breed in the housing estate east of the site.
Rook		Frequently observed flying overhead. No rookeries observed on the site.

Species	Qualification Criteria	Comments
Corvus frugilegus		
Raven *Corvus corax*		Two observed flying overhead on the 27th of February.
Starling *Sturnus vulgaris*	SPEC 3	Occasionally observed flying over the site. Likely to breed in the housing estate east of the site.
Chaffinch *Fringilla coelebs*		A flock of 6 was observed on waste ground, south of the site on the 21st March.
Redpoll *Acanthis flammea*		Occasionally observed in single numbers over the site. May breed in hedgerows to the north of the site.
Linnet *Carduelis cannabina*	SPEC 2	Flocks of up to 15 individuals were observed on the waste ground south of the site during all survey dates. Flocks of Linnets are common on waste ground and open fields in Winter on the East coast of Ireland in and the birds may be immigrants from Scotland or the Northwest of England. May breed in hedgerows in small numbers, north of the site.
Goldfinch *Carduelis carduelis*		Occasionally observed on all survey dates. Common in Ireland and may breed in hedgerows at the north of the site.
Yellowhammer *Emberiza citrinella*	BDp2,BDr2	A single individual was flushed from one of the OSR fields on the 18th March. A male and female was observed on the 21st of March. A scarce bird in Ireland, but can be quite frequently observed in parts of North County Dublin and Meath. May breed within the site.

Qualifying criteria: Red List Criteria- SPEC1 (species that are of global conservation concern). SPEC3 (species are those for which the global population is concentrated outside EuropeBDp1 (breeding population decline over shorter time periods) BDp2 (breeding population decline over longer time periods).BDr2 (breeding range decline over longer time periods)Amber List Criteria- Categories that depict an unfavourable conservation status in Europe, but not necessarily of global concern. WI (Localised non-breeding population) WDMp1 (Moderate non-breeding population decline over the short term) BDMr1 and BDMr2 (Moderate breeding range decline over short term (1) and long term(2) BDMp1 (short-term decline in breeding population), BDMp2 (long-term decline in breeding population). SPEC 2 (species for which the global population is concentrated in Europe). SPEC 3 (species for which the global population is concentrated outside of Europe)

A total of nineteen bird species was observed during the Winter site visits. Two Red-Listed species, namely meadow pipit and yellowhammer were observed during the site visits. The two Red -Listed species may breed within the site. Three Amber-Listed species, herring gull, starling and linnet were observed during the site visits. The only Amber-Listed species that may breed within the site is linnet. All other species observed are Green-Listed, species of favourable conservation status.

5. Discussion

Birds observed at the Flemington Lane site are typical of the habitats present. The species assemblage is a reflection of the agricultural fields, hedgerows and overgrown waste ground habitats within and around the site and the birds observed are typical of birds occurring in these habitats in North County Dublin in Winter.

The agricultural grassland fields to the west of the site within the boundary of the water treatment plant were devoid of birds for the most part, with the exception of birds observed flying overhead.

6. Reference

Ref. 1 Gilbert, G, Stanbury, A. & Lewis, I K. Birds of Conservation Concern in Ireland 4: 2020–2026. Irish Birds 43: 1-23.

Appendix 1b - Ornithological Survey of lands at Flemington Lane, Balbriggan, Co. Dublin (Winter 2023).

1. Introduction

Joseph Adamson MCIEEM was appointed by Altemar Ltd. to conduct a Winter ornithological survey of a parcel of land at Flemington Lane, located to the northwest of the town of Balbriggan, Co. Dublin, over the Winter of 2023/2024. This follows on from an ornithological survey of the site, carried out in February and March of 2023 by the same author. The purpose of the site visits was to survey the site to record species of birds that are frequenting the area.

2. Survey Area

The survey site, comprising of two parcels of land, lies to the west of a housing estate in an area of Balbriggan known as Flemington. The larger of the two parcels is bounded to the north by agricultural fields, to the south by a new residential housing estate, and to the east by a housing estate in an area of Balbriggan known as Tankardstown. A water treatment plant that serves the town of Balbriggan is located to the west of the site. A new road leading from the Tankardstown housing estate to the entrance to the water treatment plant bisects the site in an east-west direction. A dirt track trends from the south of the site through the centre of the site.

The second parcel is much smaller in size and is comprised of an agricultural field, bounded by a hedgerow to the south of it. This parcel is located west of the larger parcel and to the north of the water treatment plant.

The survey site was dominated for the most part by agricultural fields of stubble in which it appeared that Corn had been grown in the Summer of 2023. During the survey of February and March 2023, these agricultural fields had been under Oil Seed Rape. During the survey on the 18th of January 2024, it was evident that one of the stubble fields by the road leading up to the Water Treatment Plant had been partially ploughed when workers from the Plant were installing Sluice Valves, Air Valves and Fire Hydrants by the edge of the field. There are very few hedgerows within the site, and those that are present are in poor condition with wide gaps. The larger parcel of the site was accessed from the east, through the entrance to the Balbriggan Water Treatment Plant, which is located to the west of the site. The smaller parcel was accessed from a secondary road that borders the field to the west.

3. Methodology

The site was surveyed on the 25th and 29th October, the 4th and 20th November, the 4th and 24th December 2023, the 8th and 18th January, the 5th and 19th of February and the 3rd and 11th March 2024. Weather at the times of survey was suitable for recording, with clear spells for the most part, with strong northwesterly winds on the 4th of November 2023 and very strong southwesterlies on the 24th December 2024.

All areas within the sight boundary were surveyed by systematically walking and recording birds heard and observed. A list of birds observed during the site visit was then compiled for the entire site (Table 1).

A note was made of any species of conservation interest recorded at the site. Species highlighted in red represent species whose breeding population has declined by 50% over the last 25-30 years. Species highlighted in amber represent species that are of European Conservation Concern. They are Amber-listed because of their unfavourable conservation status but not concentrated in Europe. The remaining species are Green-listed, species of favourable conservation status (Gilbert, G., Stanbury, A., and Lewis, I.) (Ref.1).

4. Results

Table 1: Bird species recorded within the site during the Winter Bird Survey of 2023/2024, at Flemington Lane, Balbriggan, Co. Dublin

Species	**Qualification Criteria**	**Comments**
Common Buzzard ***Buteo buteo***		Two birds were observed circling over the stubble field by the road leading to the Water Treatment Plant on the 4th November 2023. One bird observed hunting over the field by the water treatment plant on the 4th December 2023. This field is outside of the site boundary.
Herring Gull ***Larus argentatus***	SPEC2, BDMp1, BDMp2	Six birds were observed over the site on the 25th of October 2023. 20 birds sitting and occasionally foraging in the stubble field by the road leading up to the Water Treatment Plant on the 4th of November 2023. There were very heavy showers, with Force 3-4 north-easterly winds on this date. No Herring Gulls were observed at the site on the 4th of December 2023. A group of thirty-one Herring Gulls was observed sitting in the stubble field by the road leading to the Water Treatment Plant on the 24th of December 2023. These birds were sheltering due to very blustery Force 5-6 southwest winds and heavy squalls. No Herring Gulls were observed during the 18th of January 2024 site survey due to disturbance from Water Treatment Plant Workers installing valves at the edge of the field by the road leading to the Water Treatment Plant. No Herring Gulls were observed during the 5th of February site visit. Four Herring Gulls were observed sitting and occasionally feeding alongside Rooks in the ploughed areas of the stubble field by the road leading to the Water Treatment Plant on the 19th of February. During the site visit on the 3rd of March, there were lots of Herring Gulls on roof tops of the housing estate to the east of the site. A lot of these birds were observed in pairs, indicating that they would be ready to start breeding. On the same date three Herring Gulls were feeding on the ploughed strip of the stubble field with Rooks and Jackdaws. There were no Herring Gulls observed on the stubble field during the 11th March site visit.
Woodpigeon ***Columba palumbus***		Frequently observed overhead. Likely to breed in mature hedgerows and trees outside of the site.
Collared Dove ***Streptopelia decaocto***		One bird flew over the site in an easterly direction on the 20th November 2023. One bird observed flying overhead on the24th December 2023.
Meadow Pipit ***Anthus pratensis***	SPEC1	Occasionally flushed from all the stubble fields in low numbers. Likely to breed in small numbers within the site, in particular the field within the site that is currently under grass.

Species	Qualification Criteria	Comments
Skylark ***Alauda arvensis***	SPEC3	Small numbers were observed flying overhead during the 25th of October site visit. These were most likely migratory birds.
Pied Wagtail ***Motacilla alba yarelli***		Observed along the track that runs in a northerly direction through the site and the new road leading to the water treatment plant.
Wren ***Troglodytes troglodytes***		Distantly observed on one occasion. May breed in hedgerows at the north of the site.
Robin ***Erithacus rubecula***		Four birds singing on the site on the 25th October 2023.
Redwing ***Turdus iliacus***		Three birds observed on the site on the 4th November 2023. A Winter visitor to Ireland from Iceland and Scandinavia. Does not breed.
Blackbird ***Turdus merula***		Frequently observed in small numbers within the site on all survey dates. Likely to breed within the site.
Magpie ***Pica pica***		Infrequently observed over the site on all survey dates.
Jackdaw ***Corvus monedula***		Occasionally observed flying overhead on all survey dates. Observed feeding in the stubble field that was partially ploughed/disturbed during the January 2024 site visit. Likely to breed in the housing estate east of the site.
Rook ***Corvus frugilegus***		Frequently observed flying overhead. Also observed feeding in the stubble field that was partially ploughed in January 2024. No rookeries observed on the site.
Starling ***Sturnus vulgaris***	SPEC 3	Occasionally observed flying over the site. Likely to breed in the housing estate east of the site.
Chaffinch ***Fringilla coelebs***		Occasionally observed at the site, associating with other finches. May breed in hedgerows within the site
Redpoll ***Acanthis flammea***		Occasionally observed in single numbers over the site. May breed in hedgerows to the north of the site.
Linnet ***Carduelis cannabina***	SPEC 2	A flock of c. 150 birds was observed on the 25th October 2023. A flock of 20 birds was observed on the 3rd February 2024. Flocks of Linnets are common on waste ground and open fields in Winter on the East coast of Ireland in and the birds may be immigrants from Scotland or the Northwest of England. May breed in hedgerows in small numbers, north of the site.
Goldfinch ***Carduelis carduelis***		Occasionally observed on all survey dates.

Species	Qualification Criteria	Comments
		Common in Ireland and may breed in hedgerows at the north of the site.
Greenfinch ***Carduelis chloris***	BDMp1	Five birds were observed with a large flock of c. 150 Linnets on the 25th October 2023. A flock of fifteen was observed with a flock of Linnets on the 4th of December 2023.
Yellowhammer ***Emberiza citrinella***	BDp2, BDr2	Five birds were observed along a hedgerow by the northernmost stubble field on the 19th February 2024. Two birds flew overhead at the south of the site on the same date. A scarce bird in Ireland, but can be quite frequently observed in parts of North County Dublin and Meath.
Reed Bunting ***Emberiza schoeniclus***		Three females were observed in a hedgerow at the southwest of the site on the 4th of November 2023.

Qualifying criteria: Red List Criteria- SPEC1 (species that are of global conservation concern). SPEC3 (species are those for which the global population is concentrated outside EuropeBDp1 (breeding population decline over shorter time periods) BDp2 (breeding population decline over longer time periods).BDr2 (breeding range decline over longer time periods)Amber List Criteria- Categories that depict an unfavourable conservation status in Europe, but not necessarily of global concern. WI (Localised non-breeding population) WDMp1 (Moderate non-breeding population decline over the short term) BDMr1 and BDMr2 (Moderate breeding range decline over short term (1) and long term(2) BDMp1 (short-term decline in breeding population), BDMp2 (long-term decline in breeding population). SPEC 2 (species for which the global population is concentrated in Europe). SPEC 3 (species for which the global population is concentrated outside of Europe)

A total of twenty-two bird species was observed during the Winter 2023/2024 bird survey. Two Red-Listed species, namely meadow pipit and yellowhammer were observed during the site visits. The two Red -Listed species may breed within the site. Three Amber-Listed species, herring gull, starling, skylark, greenfinch and linnet were observed during the site visits. The only Amber-Listed species that may breed within the site are greenfinch and linnet. All other species observed are Green-Listed, species of favourable conservation status.

5. Discussion

Birds observed at the Flemington Lane site are typical of the habitats present. The species assemblage is a reflection of the agricultural fields, hedgerows and overgrown waste ground habitats within and around the site and the birds observed are typical of birds occurring in these habitats in North County Dublin in Winter.

The agricultural grassland fields to the west of the site within the boundary of the water treatment plant were devoid of birds for the most part, with the exception of birds observed flying overhead and occasional foraging rooks when the fields were saturated due to frequent rain events.

This report is also a response to concerns that were raised about the occurrence of herring gull observed at the site in the survey of 2023, and that the occurrence of this species at the site was not considered in relation to the species being one of the qualifying interests in the newly established North-West Irish Sea Special Protection Area (SPA). A number of points need to be raised regarding the occurrence of this species at the site.

- The Winter survey report carried out in February and March 2023 mentioned that birds were observed flying overhead. It did not mention that the fields within the site were being utilised by herring gulls. Afterall, during that survey, all fields, with the exception of a field under grass, were planted with Oil Seed Rape. The following summer, the fields were under Corn. It was only when the Corn was harvested and the fields became Corn stubble fields, when the winter survey commenced, that herring gulls, and indeed corvids, such as rooks and jackdaws were present.
- The gulls only started to occur at the site when the fields were under stubble. Due to constant rain events, invertebrates within the soil rise to the surface, which makes it easier for gulls to feed on them. Most of the time the gulls were sitting, in small numbers.
- It must be noted that only one stubble field within the entire site, namely the field adjacent to the road leading up to the Water Treatment Plant, was occupied by gulls and corvids. It must be noted that during the site visits on the 4th of November and the 24th of December herring gulls were present in this particular field, in double digit numbers. The weather on these days was extremely inclement and the birds were merely sitting and sheltering from the strong winds.
- During the 18th of January site visit, it was noted that the soil within this particular stubble field had been disturbed, due to Water Treatment Plant workers installing water valves by the road. The soil had been disturbed in strips, where pipes were laid, and it was on these strips where gulls and corvids were feeding.
- It is not unusual for gull species to occur and feed in fields in inland sites. A recently ploughed field can attract hundreds of gulls, as indeed, a field where the first cut of silage has taken place, or any grass cutting in general.
- Herring gulls were present flying around the site on all monthly visits. They were also abundant flying over Balbriggan town. This is to be expected in any coastal town in Ireland. It is known that they breed on roof tops in the town and are regarded as a nuisance species by residents in the area.
- In conclusion, just because herring gulls were present within the survey site does not necessarily mean that this is their preferred habitat within the area. During the final site visit on the 11th of March, there were no herring gulls present. However, on the same date, the author observed a large number of c.3,000+ gulls, mainly comprised of herring gulls, feeding on the tideline of Gormanston Strand, located <5km northeast of the study site. The large number of gulls was present at Gormanston Strand after a north-easterly storm on Saturday the 9th of March.

6. Reference

Ref. 1 Gilbert, G, Stanbury, A. & Lewis, I K. Birds of Conservation Concern in Ireland 4: 2020–2026. Irish Birds 43: 1-23.

Appendix II Wintering bird assessment (winter 2024/2025)

ALTEMAR
Marine & Environmental Consultancy

Wintering Bird Assessment for a proposed development at Flemington South, Balbriggan, Co. Dublin

16th December 2025

Prepared by: Frank Spellman of Altemar Ltd.

On behalf of: Glenveagh Homes Limited

Altemar Ltd., 50 Templecarrig Upper, Delgany, Co. Wicklow. 00-353-1-2010713. info@altemar.ie
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Document Control Sheet			
Client	Glenveagh Homes Limited		
Project	Wintering Bird Assessment at Flemington South, Balbriggan, Co. Dublin		
Report	Wintering Bird Assessment		
Date	16th December 2025		
Version	Author	Reviewed	Date
01	Frank Spellman	Jack Doyle	26th August 2025
Final	Frank Spellman	Jack Doyle & Bryan Deegan	16th December 2025

SUMMARY

Structure / features:	The survey area consists of arable crops with grassland, recolonising bare ground, dry meadows and grassy verges, derelict structures and hedgerows.
Location:	Lands at Flemington, Balbriggan, Co. Dublin.
Bird species present:	Blackbird, black-headed gull, blue tit, brent goose, buzzard, chaffinch, collared dove, common gull, dunnock, feral pigeon, goldfinch, great tit, greenfinch, herring gull, hooded crow, house sparrow, jackdaw, kestrel, linnet, meadow pipit, mistle thrush, pheasant, robin, rook, skylark, song thrush, sparrowhawk, starling, woodpigeon, wren, yellowhammer.
Proposed work:	Residential Development.
Surveys by:	Frank Spellman and Jack Doyle
Survey date:	22nd/29th October 2024, 19th/22nd November 2024, 3rd/10th December 2024, 22nd/28th January 2025, 6th/23rd February 2025, 5th/11th March 2025.

Competency of assessor

Since its inception in 2001, Altemar has been delivering ecological and environmental services to a broad range of clients. Operational areas include: residential; infrastructural; renewable; oil & gas; private industry; Local Authorities; EC projects; and, State/semi-State Departments.

Bryan Deegan (MCIEEM, BSc Applied Marine Biology, MSc Environmental Science)

Bryan Deegan, the managing director of Altemar, is an Environmental Scientist and Marine Biologist with 30 years' experience working in Irish terrestrial and aquatic environments, providing services to the State, Semi-State and industry. He is currently lead project ecologist for Project Pembroke and was contracted to Inland Fisheries Ireland as the sole "External Expert" to environmentally assess internal and external projects. He is also chair of an internal IFI working group on environmental assessment. Bryan Deegan (MCIEEM) holds a MSc in Environmental Science, BSc (Hons.) in Applied Marine Biology, NCEA National Diploma in Applied Aquatic Science and a NCEA National Certificate in Science (Aquaculture).

Frank Spellman (BSc Zoology, MSc Zoology).

This report has been prepared by Frank Spellman. Frank has extensive experience in carrying out a wide range of fauna surveys as both a sub-contractor and employee for environmental consultancies and organisations in Ireland and the US. These include both roving and static acoustic bat surveys, terrestrial non-avian mammal surveys, breeding/wintering bird surveys, and freshwater ecology surveys. Frank has been lead ornithologist on numerous development projects within Ireland carrying out full wintering bird and breeding bird assessments.

Jack Doyle (MSc Sustainable Environments)

This report has been contributed to by Jack Doyle (MSc Sustainable Environments). Jack has previous experience in carrying out a wide range of fauna surveys, including both roving and static acoustic bat surveys, terrestrial non-avian mammal surveys, and breeding/wintering bird surveys.

Legislative context

The Wildlife Act 1976 protects wild birds in Ireland. Based on this legislation it is an offence to wilfully interfere with or destroy wild birds and their nests and eggs (other than the wild species mentioned in the Third Schedule of this Act). Under this legislation it is an offence for any person who "*wilfully takes or removes the eggs or nest of a protected wild bird otherwise than under and in accordance with such a licence, wilfully destroys, injures or mutilates the eggs or nest of a protected wild bird, wilfully disturbs a protected wild bird on or near a nest containing eggs or unflown young.*"

Habitats Directive- Council Directive 92/43/EEC 1992 on the conservation of natural habitats and of wild fauna and flora has been transposed into Irish Law, including, via, *inter alia*, the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

Council Directive 2009/147/EC 2010 on the conservation of wild birds provides for the conservation of wild birds by, among other things, classifying important ornithological sites as Special Protection Areas. The Directive relates to the conservation of all species of naturally occurring birds in the wild state, their eggs, nests and habitats in the European territory of the Member States. The Directive prohibits in particular:

- deliberate killing or capture by any method;
- deliberate destruction of, or damage to, their nests and eggs or removal of their nests;
- taking their eggs in the wild and keeping these eggs even if empty;
- deliberate disturbance of these birds particularly during the period of breeding and rearing, in so far as disturbance would be significant having regard to the objectives of this Directive;
- keeping birds of species the hunting and capture of which is prohibited.

Under the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), notwithstanding any consent, statutory or otherwise, given to a person by a public authority or held by a person, except in accordance with a licence granted by the Minister under Regulation 54, a person who in respect of the species referred to in Part 1 of the First Schedule:

- deliberately captures or kills any specimen of these species in the wild,
- deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration,
- deliberately takes or destroys eggs of those species from the wild,

- damages or destroys a breeding site or resting place of such an animal, or
- keeps, transports, sells, exchanges, offers for sale or offers for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive, shall be guilty of an offence.

Description of the Proposed Project

The development will consist of the construction of 815 no. dwellings (610 no. houses, 194 apartments & 11 no. later living dwellings), a portion of the C-Ring Road, open space, community building/retail floorspace and 2 no. creches as follows:

A) Demolition of existing single storey dwelling (c. 154 sq. m) and agricultural outbuilding (c. 366 sq. m) located to the south of Flemington Lane;

B) Provision of portion of '*C-Ring Road'* from Flemington Lane [to include junctions and ancillary footpaths, cycle paths, lighting, bus stops, boundary wall to adjoining owner, and tie in to existing roads/agricultural access points] to link into the existing R122 roundabout with vehicular access also from the Boulevard Road, Hamlet Lane, & Flemington Lane along with associated amendments to the layout of the Local Road L1130 (also known as the Clonard Road including the creation of a cul de sac arrangement to the south of the C-Ring Road); the provision of car parking spaces (1,037 no.), bicycle parking spaces (1,144 no.) and all internal roads and footpaths and bicycle and bin stores, & substations;

C) Provision of a community pavilion (2 storeys) comprising community floorspace of c. 730 sq. m (with flexible internal spaces) along with a retail unit (c. 419 sq. m) at ground floor of apartment Block F as well as 2 no. 2 storey creches c. 530 sq. m each with ancillary parking and open space areas;

D) 610 no. terraced, semi-detached & detached houses comprising 318 no. 2-bedroom houses (2 storey), 254 no. 3-bedroom houses (2 storey) and 38 no. 4-bedroom houses [house types B1/F4/F5 with variants] 3 storeys;

E) 194 no. apartments in 5 no. apartment buildings (52 no. studio apartments, 87 no. 1 bedroom apartments, 51 no. 2 bedroom apartments and 4 no. 3 bedroom apartments - all apartments with terrace or balcony on elevations) as follows: Block A [4 storeys & 64 no. apartments] comprising 47 no. 1 bedroom apartments and 17 no. 2 bedroom apartments; Block C, [Part 3-4 storeys & 18 no. apartments] comprising 10 no. 1 bedroom apartments, 6 no. 2 bedroom apartments & 2 no. 3 bedroom apartments; Block F [Part 4-5 storeys & 48 no. apartments] comprising 36 no. 1 bedroom apartments and 12 no. 2 bedroom apartments; Block G [Part 3-4 storeys & 40 no. apartments]; comprising 30 no. 1 bedroom apartments and 10 no. 2 bedroom apartments; Block H [part 3-4 storeys & 24 no. apartments] comprising 16 no. 1 bedroom apartments, 6 no. 2 bedroom apartments & 2 no. 3 bedroom apartments;

F) 11 no. single storey 2 bedroom later living houses with associated communal open space;

G) 5.26 hectares of open space comprising Class 1 Open Space (c. 2.39 hectares in the western separate parcel of land), Public open space c.2.87 hectares, hard and soft landscaping (including public lighting & boundary treatment, ESB substations, bicycle and bin stores) and communal/semi-private open space for the proposed apartment units;

H) Provision of surface water attenuation measures, connection to water supply, provision of foul drainage infrastructure (and Uisce Eireann diversion) to Uisce Eireann specifications and all ancillary site development, construction, and landscaping works including reprofiling of the site where required;

I) The proposals will replace the previously permitted LRD under planning reg. ref. LRD0006/S3 & ACP Ref: 319343-24.

The survey area is demonstrated in Figure 1.

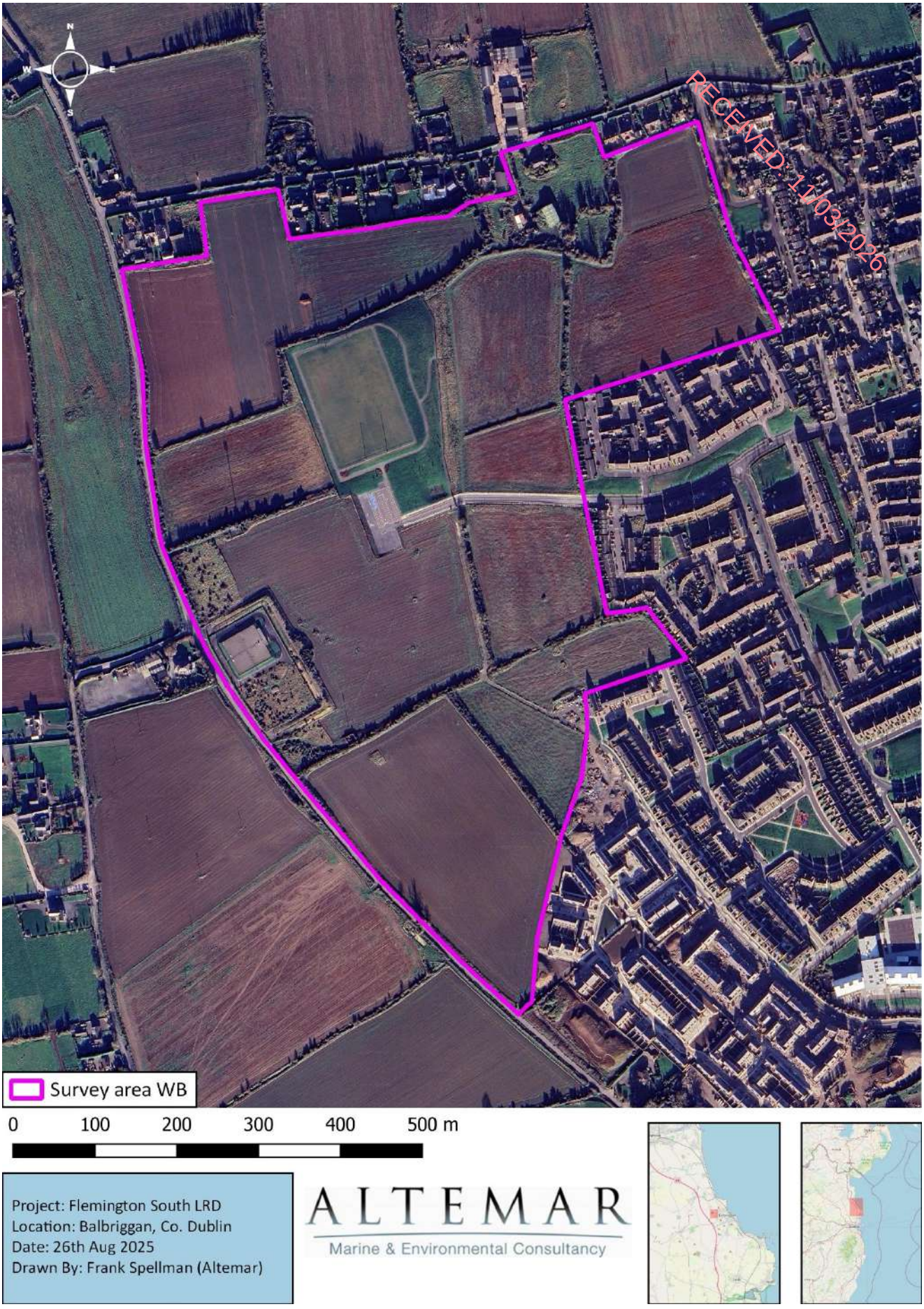

Figure 1. *Wintering bird survey area.*

Figure 2. *Wintering bird survey area location.*

Wintering bird surveys

This report presents the methodology and results of 12 visits to lands at Flemington, Balbriggan, Co. Dublin by Frank Spellman and Jack Doyle from October 2024 to March 2025.

Survey methodology

Wintering bird surveys were carried out over the entire wintering bird season on lands at Flemington, Balbriggan, Co. Dublin in order to gather baseline data to assist in assessing the potential impacts on wintering birds from future proposed developments on the site, in particular those listed as Qualifying Interests of SPAs within 15 km and other amber/red-listed birds of conservation concern in Ireland (BoCCI). Potential impacts on wintering bird species include disturbance, destruction of foraging areas, destruction of roosting areas and collision risk during construction and operation (cranes, buildings etc.). These wintering bird surveys were carried out based on the BTO Common Bird Census (Bibby *et al.*, 2000 and Gilbert *et al.*, 1998) and I-WeBS Counter Manual: Guidelines for Irish Wetland Bird Survey counters (BWI & NPWS), following CIEEM guidelines.

A 15-minute settlement period was given following arrival to allow resumption of bird activity after any possible disturbance caused by arrival to the site. Various features such as grassland, hedgerows, treelines, agricultural fields, scrub and amenity grassland were present within the survey area. A roving transect survey around the perimeter was carried out on each occasion, providing clear views of all areas within and over that survey area. Any observed behaviour by wintering bird species and other relevant species (birds of prey, red-listed BoCCI etc.) observed within, over and immediately adjacent to the survey area were recorded. The presence of all other bird species (e.g. passerine) was also recorded. Each survey was carried out by a single surveyor.

A pair of binoculars were used by the surveyor to identify and count birds at distance.

Care was taken not to double count any observations. Surveys were initiated at varying times (morning/midday/afternoon) and at low tide levels on both incoming and outgoing tides when bird activity and birds transiting to/from foraging and roosting areas was at its highest. Local temperatures varied from 4 – 8°C. Winds varied from 1 – 2 on the Beaufort scale. Weather conditions were suitable on all occasions.

Peak counts for the survey area were compared to 1% national and international population sizes of relevant species for which data was available. Foraging areas, flight paths, large flights and other observations were mapped according to field sheet records.

Survey Results/discussion

Habitats of wintering bird potential

A desk and ground level wintering bird habitat assessment were carried and used to examine the structures, features and vegetation on site that could provide wintering bird habitat. Potential features associated with foraging/roosting include agricultural fields, improved/ammenity grassland, scrub, watercourses and drainage ditches, estuaries and intertidal zones. All open areas, vegetated areas, built areas and water-holding features within and immediately adjacent to the site were assessed for wintering bird potential.

Habitat of foraging value for wintering birds was present throughout the site. The site and its surroundings consisted mainly of arable crops with grassland, recolonising bare ground, dry meadows and grassy verges, derelict structures and hedgerows.

The site is in close proximity (1.5 km) from North-West Irish Sea SPA, and so there is a high potential for Qualifying Interests of this SPA to utilise and/or fly over the site.

Wintering bird activity survey

A total of 31 species were recorded within, above and adjacent to the survey area across 12 surveys. 19 green, nine amber and three red species of conservation concern were recorded either within, over and adjacent to the overall survey area. Details regarding the status, behaviour and abundances of species recorded on/over/adjacent to the site relevant to the conservation interests of Special Protected Areas (SPAs) and red listed Birds of Conservation Concern in Ireland (BoCCI) are discussed below.

Black-headed gull (amber BoCCI) was observed in flight over the survey area during five surveys (figure 5). This species was recorded foraging in a field west of the survey area on one occasion (figure 7). A total of 17 observations of black-headed gull were made of a total of 49 individuals. This species was only observed foraging within the survey area when harvesting was taking place within the agricultural fields. Agricultural fields area abundant throughout the greater area surrounding the site and are likely selective of sites being disturbed by active farming for foraging, as well as within the nearby marine environment. No particular pattern was identified by flight paths. Peak count was 22 individuals. This species is a Qualifying Interest of the nearby North-West Irish Sea SPA. The peak number is below 1% of the international population (table 2).

Common gull (amber BoCCI) was observed flying over the survey area on two occasions during one survey, totalling two individuals (Figure 6). Peak count was 2 individuals. This species is a Qualifying interest for the nearby North-West Irish Sea SPA. The peak number is below 1% of the international population (table 2).

Herring gull (amber BoCCI) was observed in flight over within the survey area during 12 surveys (figures 3 and 4). A total of 131 observations of herring gull were made of a total of 432 individuals. This species was only observed foraging on two instances on exposed earth within the survey area. No particular pattern was discerned from individual flight paths, however, large flights of Herring Gull typically circled above houses in the residential development along the eastern boundary of the surveya area (Figure 4). Peak count was 119 individuals. This species is a Qualifying Interest of the nearby North-West Irish Sea SPA. The peak number is below 1% of the international population (table 2).

Kestrel (red BoCCI) was observed hunting over the survey area during three surveys (Figures 6 & 7). A total of 3 observations of kestrel were made, totalling 1 no. individuals in each instance. This is likely the same individual kestrel recorded over multiple surveys. This kestrel was observed hovering over the dry meadow grassland within the overall survey area.

Light-bellied Brent Goose (amber BoCCI) was observed in flight at a height of 200m over the survey area during one survey (figure 6). A total of 1 observations of brent goose were made of a total of 5 individuals. This species was not observed foraging within the survey area, although likely forages on agricultural grassland and ammenity grassland in the greater area, as well as the estuarine/intertidal environment to the south/north. Peak count was 5 individuals. The peak number is below 1% of the national and international populations (table 2).

Meadow pipit (red BoCCI) was observed foraging within the survey area during one survey (Figure 7). Peak count was 5 individuals. This species was primarily recorded foraging within the dry grassy meadow grassland habitat in the centre of the survey area. Given that 5 individual meadow pipits were recorded once across 12 surveys, the survey area is not considered to be of significance to this species.

Yellowhammer (red BoCCI) was observed foraging within the survey area during one survey (Figure 7). A total of 2 observations of yellowhammer were made, totalling 1 no. individuals. This individual yellowhammer was observed proximate to a hedgerow dissecting the centre of the survey area.

Table 1. *Species recorded within, above and/or immediately adjacent to the survey area.*

Common name	BTO	Latin name	BoCCI
Blackbird	B.	*Turdus merula*	Green
Black-headed Gull	BH	*Larus ridibundus*	Amber
Blue Tit	BT	*Cyanistes caeruleus*	Green
Brent Goose	BG	*Branta bernicla hrota*	Amber
Buzzard	BZ	*Buteo buteo*	Green
Chaffinch	CH	*Fringilla coelebs*	Green
Collared Dove	CD	*Streptopelia decaocto*	Green
Common Gull	CM	*Larus canus*	Amber
Dunnock	D.	*Prunella modularis*	Green
Feral Pigeon	FP	*Columba livia f. domestica*	Green
Goldfinch	GO	*Carduelis carduelis*	Green
Great Tit	GT	*Parus major*	Green
Greenfinch	GR	*Chloris chloris*	Amber
Herring Gull	HG	*Larus argentatus*	Amber
Hooded Crow	HC	*Corvus cornix*	Green
House Sparrow	HS	*Passer domesticus*	Amber
Jackdaw	JD	*Corvus monedula*	Green
Kestrel	K.	*Falco tinnunculus*	Red
Linnet	LI	*Carduelis cannabina*	Amber
Meadow Pipit	MP	*Anthus pratensis*	Red
Mistle Thrush	M.	*Turdus viscivorus*	Green
Pheasant	PH	*Phasianus colchicus*	Green
Robin	R.	*Erithacus rubecula*	Green
Rook	RO	*Corvus frugilegus*	Green
Skylark	S.	*Alauda arvensis*	Amber
Song Thrush	ST	*Turdus philomelos*	Green
Sparrowhawk	SH	*Accipiter nisus*	Green
Starling	SG	*Sturnus vulgaris*	Amber
Woodpigeon	WP	*Columba palumbus*	Green
Wren	WR	*Troglodytes troglodytes*	Green
Yellowhammer	Y.	*Emberiza citrinella*	Red

Table 2. *Peak counts of bird species recorded within, above and/or immediately adjacent to the survey area.*

Species	Peak count (2024/25)	1% national	1% international
Blackbird	6		
Black-headed Gull	22		>10,000
Blue Tit	3		
Brent Goose	5	350	400
Buzzard	3		
Chaffinch	4		
Collard Dove			
Common Gull	2		>10,000
Dunnock	5		
Feral Pigeon	42		
Goldfinch	3		
Great Tit	1		
Greenfinch	17		
Herring Gull	119		>1000
Hooded Crow	12		
House Sparrow	17		
Jackdaw	36		
Kestrel	1		
Linnet	42		
Meadow Pipit	5		
Mistle Thrush	6		
Pheasant	4		
Robin	3		
Rook	14		
Skylark	8		
Song Thrush	5		
Sparrowhawk	1		
Starling	60		
Woodpigeon	200		
Wren	3		
Yellowhammer	1		

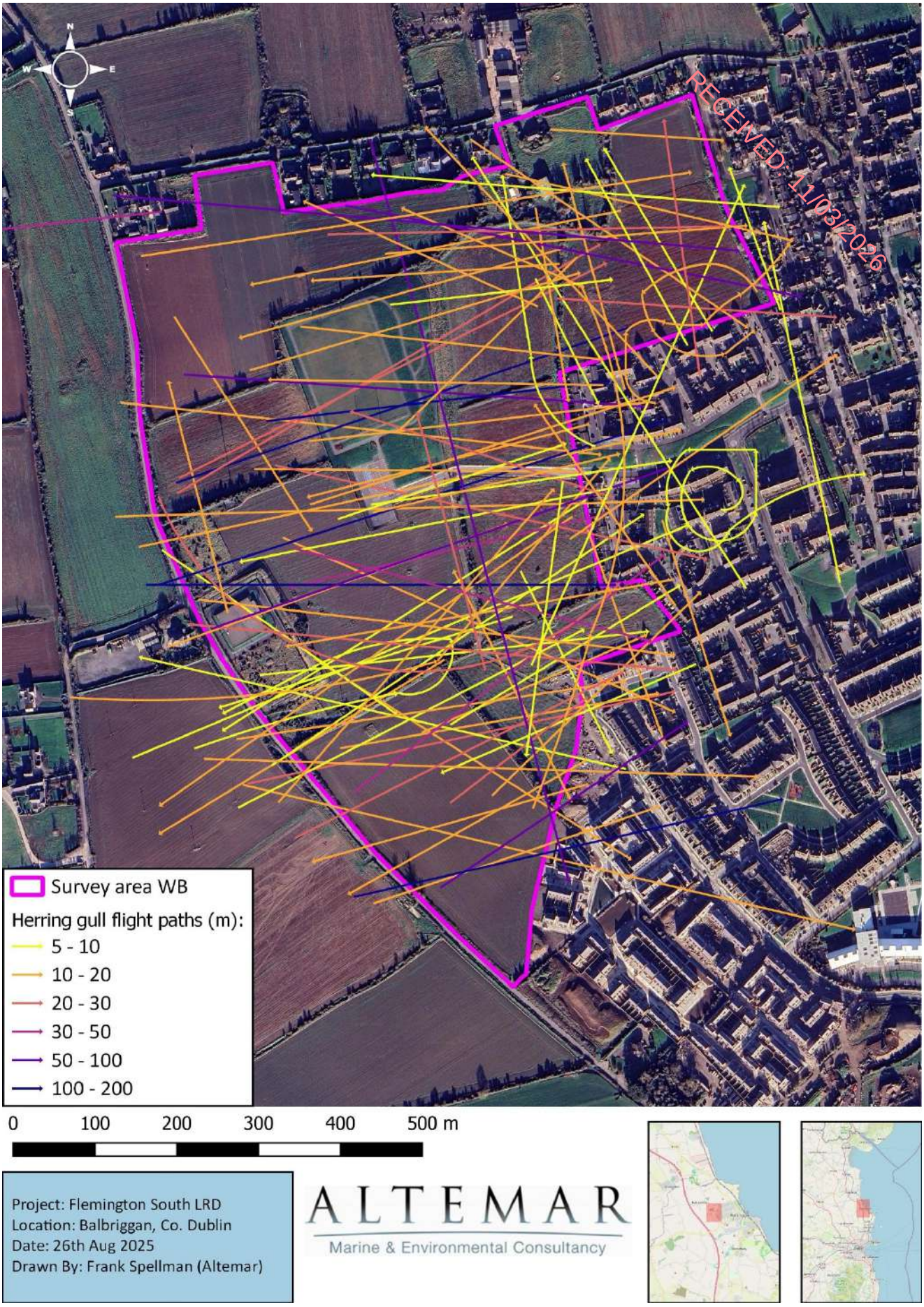

Figure 3. *Herring gull flight paths.*

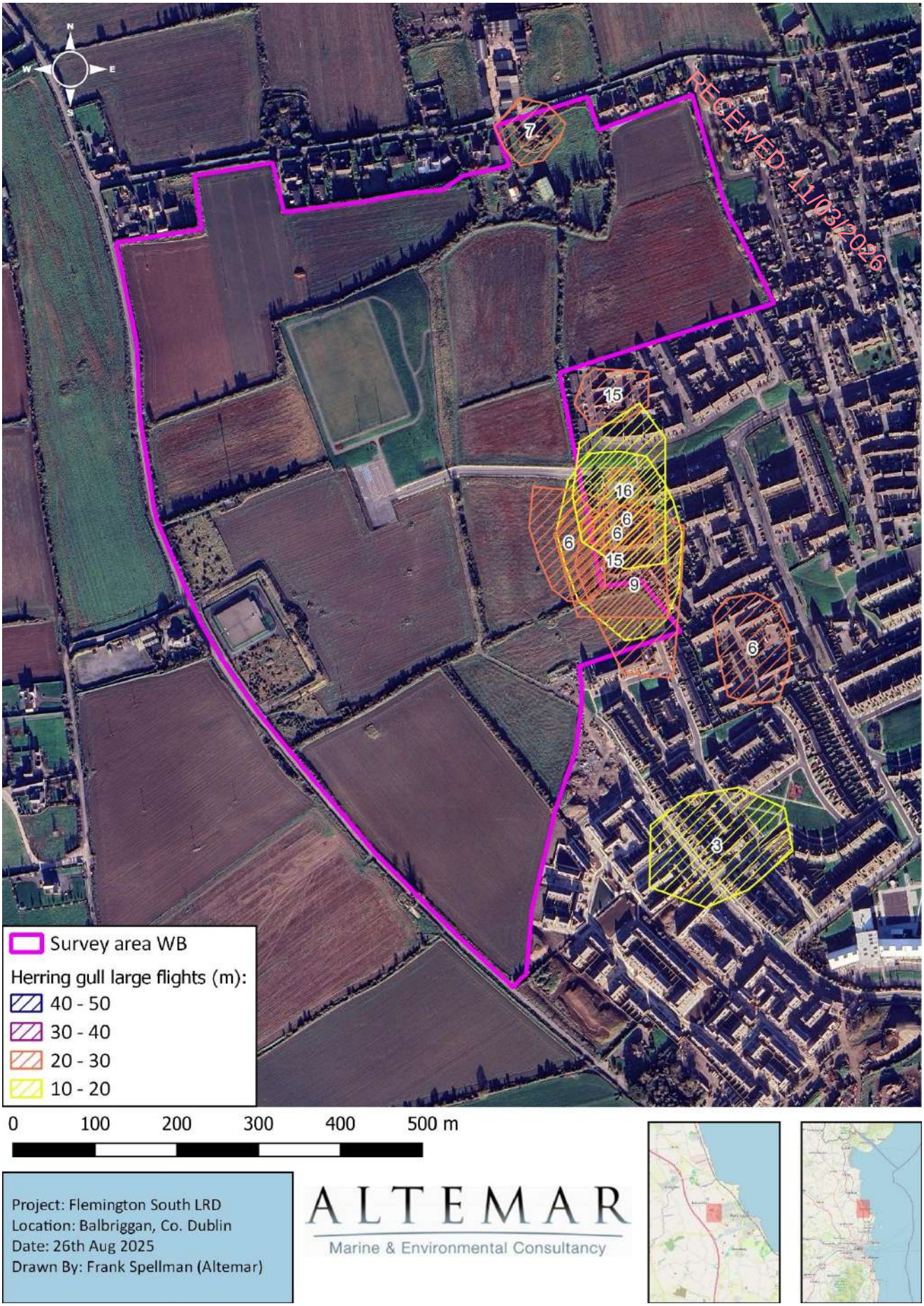

Figure 4. *Herring gull large flights*

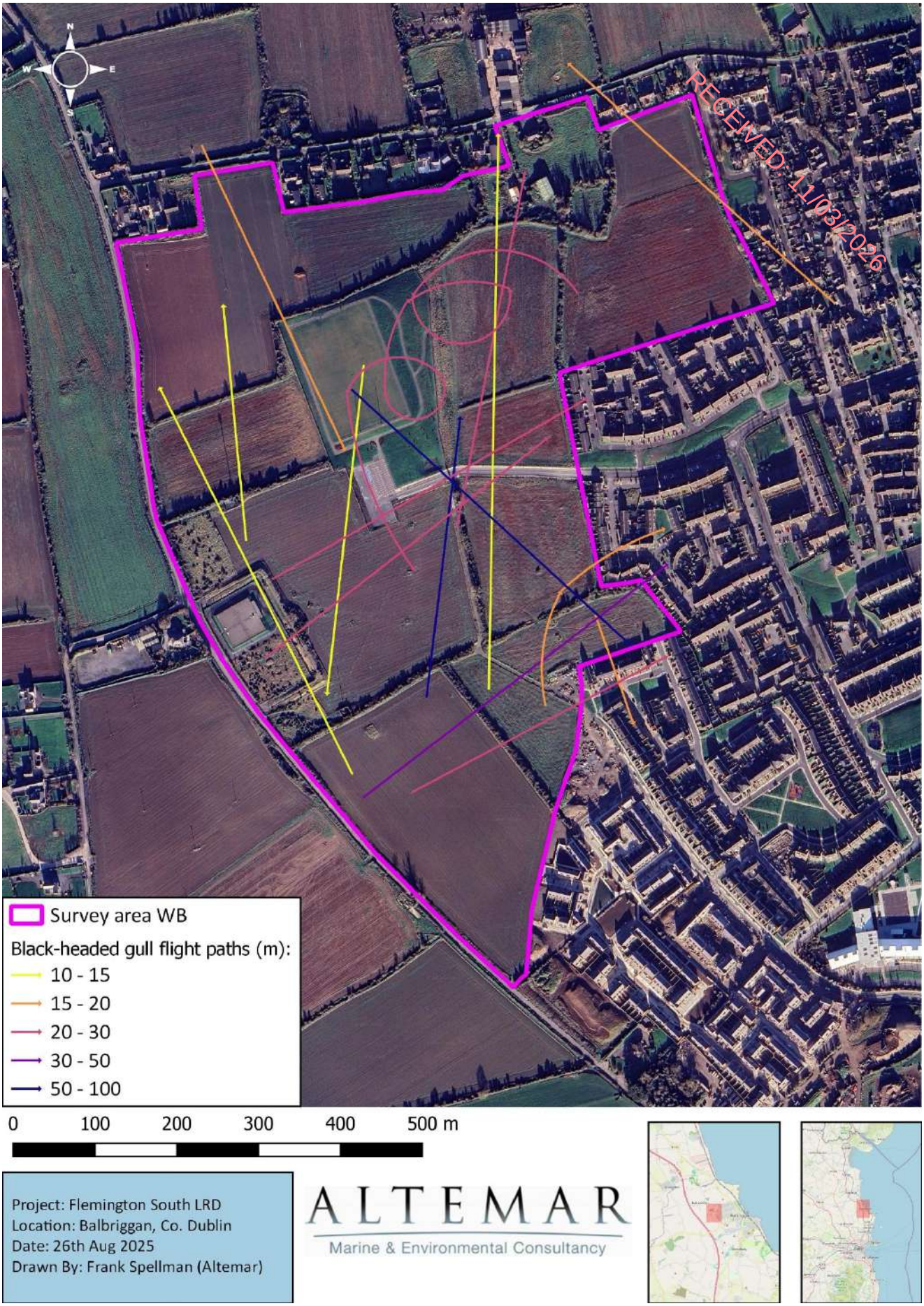

Figure 5. *Black-headed gull flight paths.*

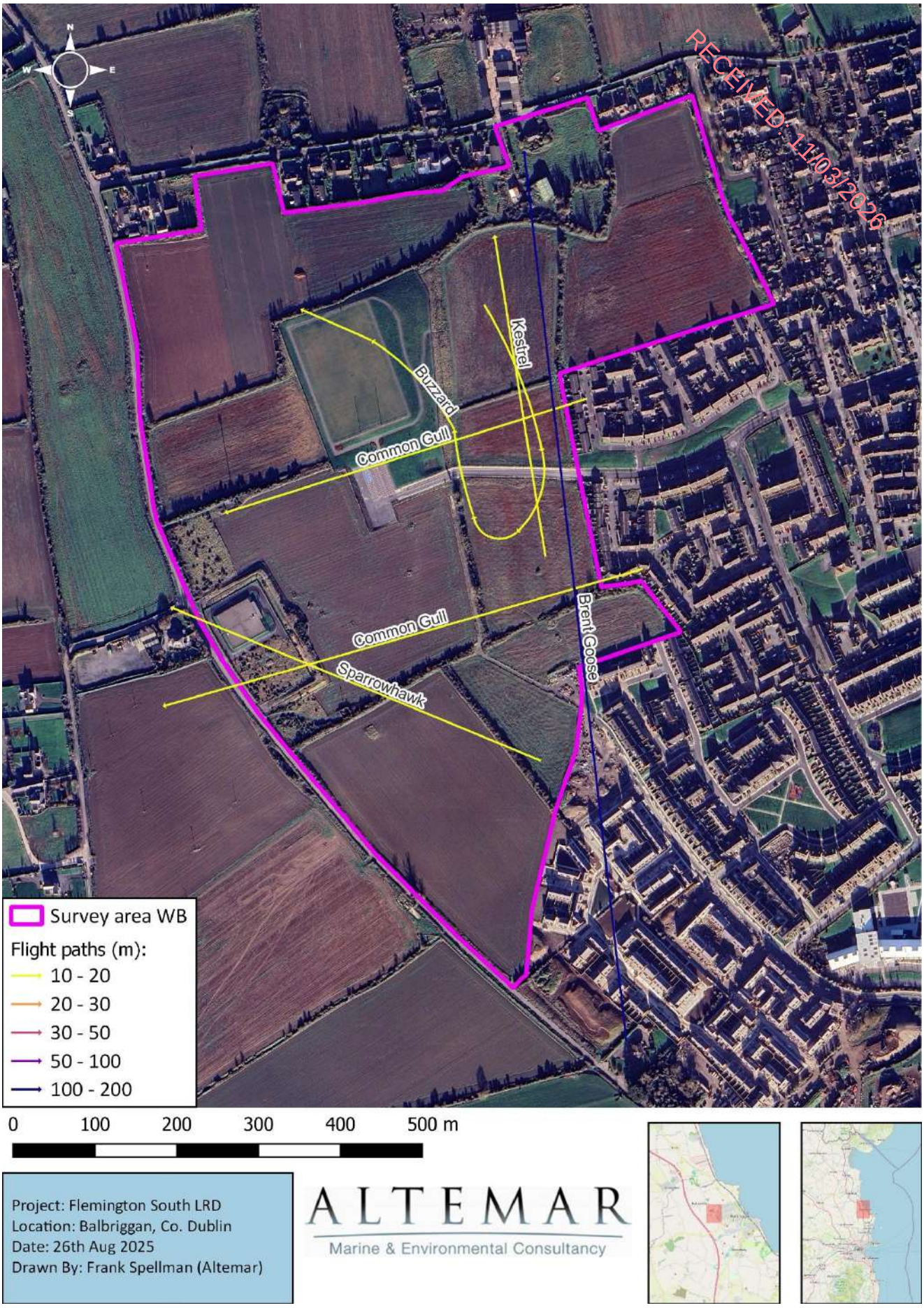

Figure 6. *Flight paths for other species.*

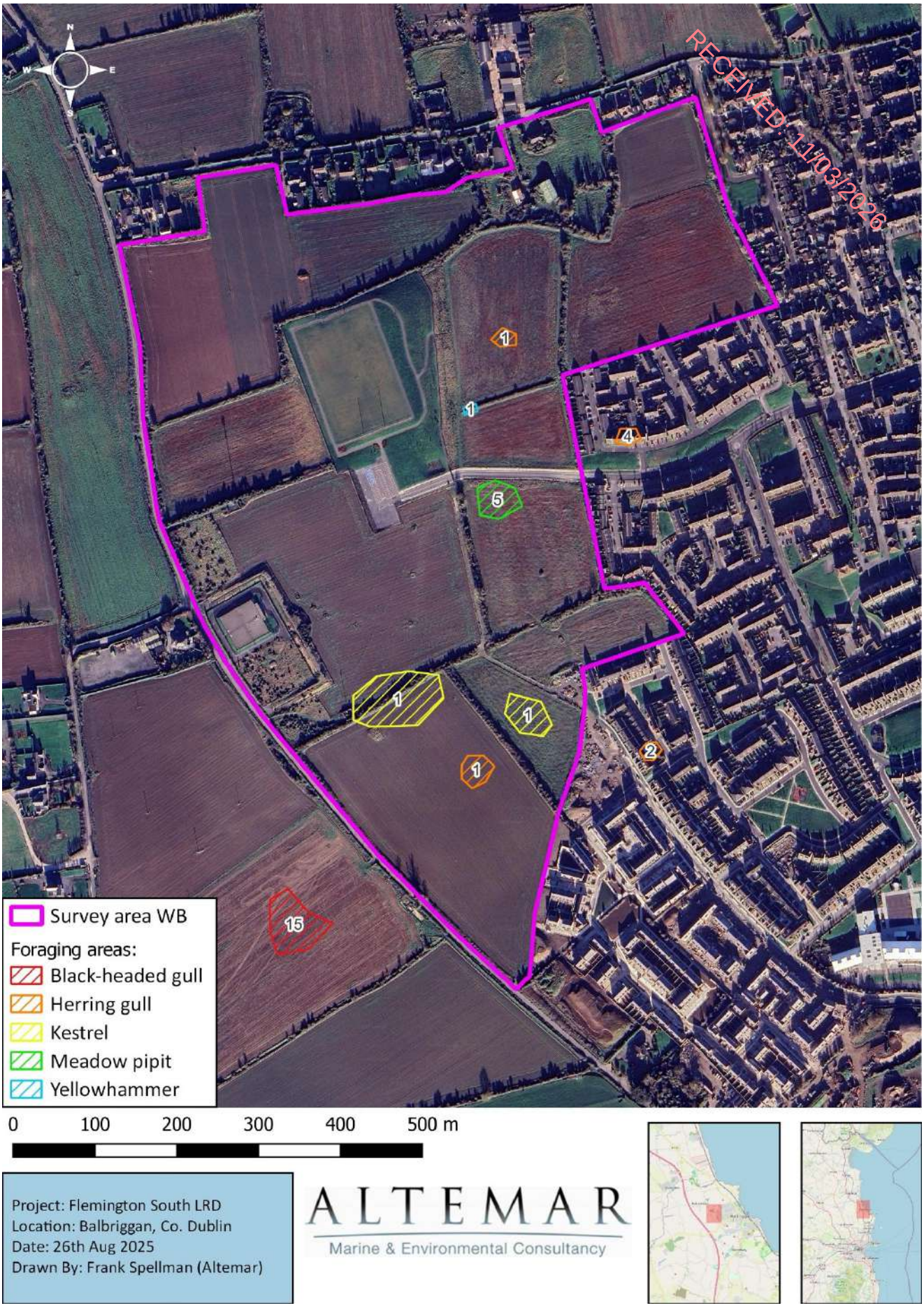

Figure 7. *Foraging areas.*

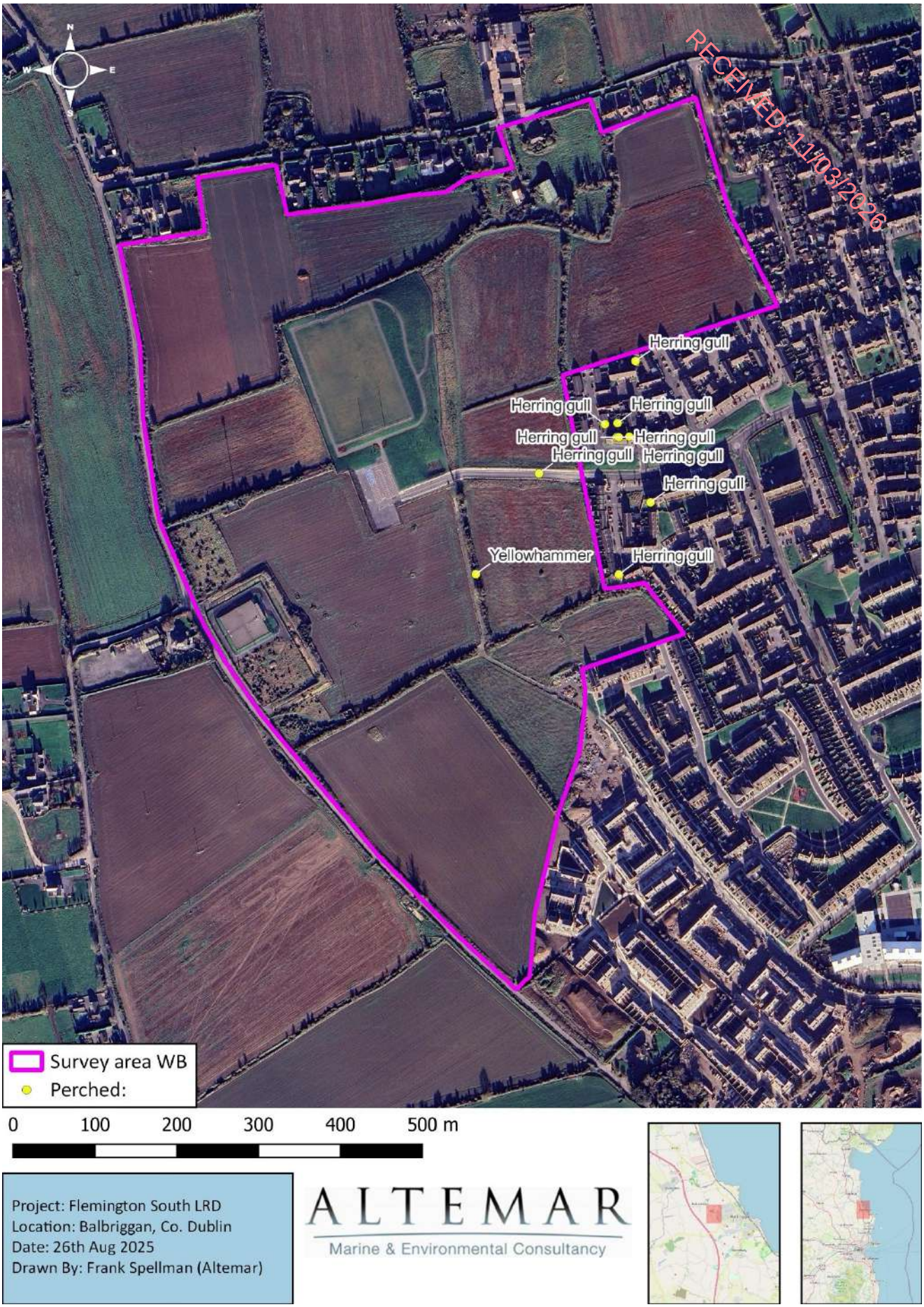

Figure 8. *Species observed perched/resting within or adjacent to the survey area.*

Wintering bird assessment findings

Review of local bird records

The review of existing bird records (sourced from NBDC Database) within a 2 km^2 grid (Reference grid O16W) encompassing the study area reveals that 35 known bird species have previously been observed and recorded locally (*Table 3*).

Table 3: *NBDC bird records within 2 km^2*

Species Name	*Record Count*	*Date of Last Record*	*Dataset*
Barn Owl (Tyto alba)	*1*	*29/08/2018*	*Birds of Ireland*
Blackbird (Turdus merula)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Blue Tit (Cyanistes caeruleus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Bullfinch (Pyrrhula pyrrhula)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Buzzard (Buteo buteo)	*2*	*18/05/2018*	*Birds of Ireland*
Chaffinch (Fringilla coelebs)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Collared Dove (Streptopelia decaocto)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Curlew (Numenius arquata)	*1*	*01/02/2024*	*Birds of Ireland*
Dunnock (Prunella modularis)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Goldfinch (Carduelis carduelis)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Great Tit (Parus major)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Herring Gull (Larus argentatus)	*2*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Hooded Crow (Corvus cornix)	*1*	*07/05/2018*	*Birds of Ireland*
House Sparrow (Passer domesticus)	*2*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Jackdaw (Coloeus monedula)	*2*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Killdeer (Charadrius vociferus)	*1*	*12/01/1928*	*Rare birds of Ireland*
Linnet (Linaria cannabina)	*1*	*07/05/2018*	*Birds of Ireland*
Long-tailed Tit (Aegithalos caudatus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Magpie (Pica pica)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Mistle Thrush (Turdus viscivorus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Peregrine (Falco peregrinus)	*1*	*16/04/2021*	*Birds of Ireland*
Pheasant (Phasianus colchicus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Redwing (Turdus iliacus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Reed Bunting (Emberiza schoeniclus)	*1*	*07/05/2018*	*Birds of Ireland*
Robin (Erithacus rubecula)	*2*	*06/05/2018*	*Birds of Ireland*
Rock Dove (Columba livia)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Rook (Corvus frugilegus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Skylark (Alauda arvensis)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Song Thrush (Turdus philomelos)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Sparrowhawk (Accipiter nisus)	*1*	*06/02/2016*	*Birds of Ireland*
Starling (Sturnus vulgaris)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Swift (Apus apus)	*1*	*19/05/2018*	*Birds of Ireland*
Woodpigeon (Columba palumbus)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Wren (Troglodytes troglodytes)	*1*	*31/12/2011*	*Bird Atlas 2007 - 2011*
Yellowhammer (Emberiza citrinella)	*2*	*22/07/2018*	*Birds of Ireland*

Historical Surveys

I-WeBS

I-WeBS National and Site Trends Report 1994/95 – 2019/20 report presents national and site-specific trends of wetland birds in Ireland. This report was used to assess the trends of species recorded during wintering bird surveys at Flemington South in winter of 2024/25. The survey area is proximate to Skerries Coast (OU904) and Nanny Estuary and Shore (OV401) I-WeBS sites.

Brent goose was the only species considered by I-WeBS recorded during wintering bird surveys at Flemington South over the 2024/25 season. The Brent goose national population is considered to be stable and/or increasing.

At both Skerries Coast and Nanny Shore and Estuary, the brent goose population is considered to be stable or increasing.

The national wetland bird trend summary (figure 9) provides long-term population trends for wintering species in Ireland. Trends for species nationally, and Skerries Coast and Nanny Shore and Estuary, are included in Appendix IIa-4.3e.

National Summary

Species	Trend (%) National - 5 Year	National - 12 Year	National - 23 Year	Long Term Trend
Scaup	-33.6	-82.9	-89.2	Large Decline
Pochard	-19.8	-60.4	-79.1	Large Decline
Goldeneye	-32.5	-39.0	-66.9	Large Decline
Lapwing	-6.5	-45.1	-63.9	Large Decline
Grey Plover	-30.6	-39.4	-57.8	Large Decline
Golden Plover	-16.9	-58.1	-54.1	Large Decline
Dunlin	5.9	-21.2	-45.2	Moderate Decline
Curlew	-8.4	-23.7	-43.1	Moderate Decline
Turnstone	-33.6	-46.0	-23.7	Intermediate Decline
Coot	-10.1	1.1	-23.2	Intermediate Decline
Mallard	-11.3	-19.7	-19.1	Intermediate Decline
Wigeon	0.9	-17.0	-18.2	Intermediate Decline
Tufted Duck	-20.7	-28.9	-17.9	Intermediate Decline
Red-breasted Merganser	-12.9	5.2	-14.7	Intermediate Decline
Pintail	-0.8	-6.0	-13.7	Intermediate Decline
Great Crested Grebe	-39.5	-6.1	-10.8	Intermediate Decline
Shoveler	23.0	-21.3	-10.8	Intermediate Decline
Knot	0.0	-12.2	-9.8	Intermediate Decline
Bar-tailed Godwit	-32.6	-13.9	-5.1	Intermediate Decline
Ringed Plover	-4.3	-26.8	-1.1	Intermediate Decline
Grey Heron	1.0	-4.9	6.6	Stable or Increasing
Redshank	-14.0	-28.4	6.7	Stable or Increasing
Shelduck	6.3	-0.8	9.3	Stable or Increasing
Oystercatcher	-17.5	-31.1	10.8	Stable or Increasing
Mute Swan	4.6	9.6	13.8	Stable or Increasing
Teal	1.8	5.7	19.4	Stable or Increasing
Purple Sandpiper	-36.4	-37.6	23.5	Stable or Increasing
Gadwall	-26.5	4.3	24.4	Stable or Increasing
Little Grebe	6.1	16.7	38.2	Stable or Increasing
Greenshank	0.9	7.3	41.0	Stable or Increasing
Cormorant	38.5	8.4	42.9	Stable or Increasing
Sanderling	-23.8	-11.1	84.6	Stable or Increasing
Black-tailed Godwit	22.5	25.0	92.3	Stable or Increasing
Light-bellied Brant Goose	-11.2	1.2	93.3	Stable or Increasing
Little Egret	34.6	61.5	483.3	Stable or Increasing

Figure 9. *I-WeBS National Trends Report.*

Conclusion

This report aims to build on the baseline data and provide information to assist in assessing the potential impact of the proposed development on wintering birds within/over/adjacent to the development area. This report presents the methodology and results of 12 visits to this location by Altemar Ltd. from October 2024 to March 2025.

A total of 31 species were recorded within, above and adjacent to the survey area across 12 surveys. 19 green, nine amber and three red species of conservation concern were recorded either within, over and adjacent to the overall survey area. Red listed species recorded within the survey area included kestrel, meadow pipit, and yellowhammer. Meadow pipit and redwing were recorded foraging throughout the survey area. 3 species listed as Qualifying Interests of North-West Irish Sea SPA were recorded: black-headed gull, common gull and herring gull. It should be noted that a single instance of 5 no. brent geese were observed flying over the subject site at a height of 200m.

The proposed residential development is predicted to reduce available foraging areas for wintering birds, in particular those listed as Qualifying Interests (QI) of nearby SPAs. However, no bird species protected as QIs of proximate SPAs were recorded foraging within the survey area during any of the 12 site surveys between October 2024 – March 2025. Further, the reduction in foraging and potential roosting areas are not significant in the context of the wider area available to species of relevance due to the widespread and abundant habitats of comparable suitability. As a result, no significant impacts on wintering bird species foraging and moving between foraging/roosting sites are likely in the absence of mitigation measures. No significant impact on species listed as QIs of any European Site or bird species of conservation interest are predicted.

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Appendix IIa – I-WeBS Trends for Skerries Coast (site code OU904).

Site Summary

Species	Trend (%) Skerries Coast - 5 Year	Skerries Coast - 12 Year	Skerries Coast - 23 Year	Long Term Trend
Lapwing	-9.1	-42.0	-79.2	Large Decline
Turnstone	-50.6	-62.4	-49.1	Moderate Decline
Redshank	-32.2	-36.6	-4.9	Intermediate Decline
Oystercatcher	-42.3	-41.7	-1.7	
Curlew	-8.1	-12.5	19.7	Stable or Increasing
Sanderling	-53.9	-34.3	22.4	
Ringed Plover	12.2	-27.2	40.7	
Cormorant	0.0	36.6	96.5	
Light-bellied Brent Goose	-37.1	6.8	110.8	
Dunlin	175.0	120.0	144.4	

Appendix IIb – I-WeBS Trends for Nanny Estuary & Shore (site code OV401).

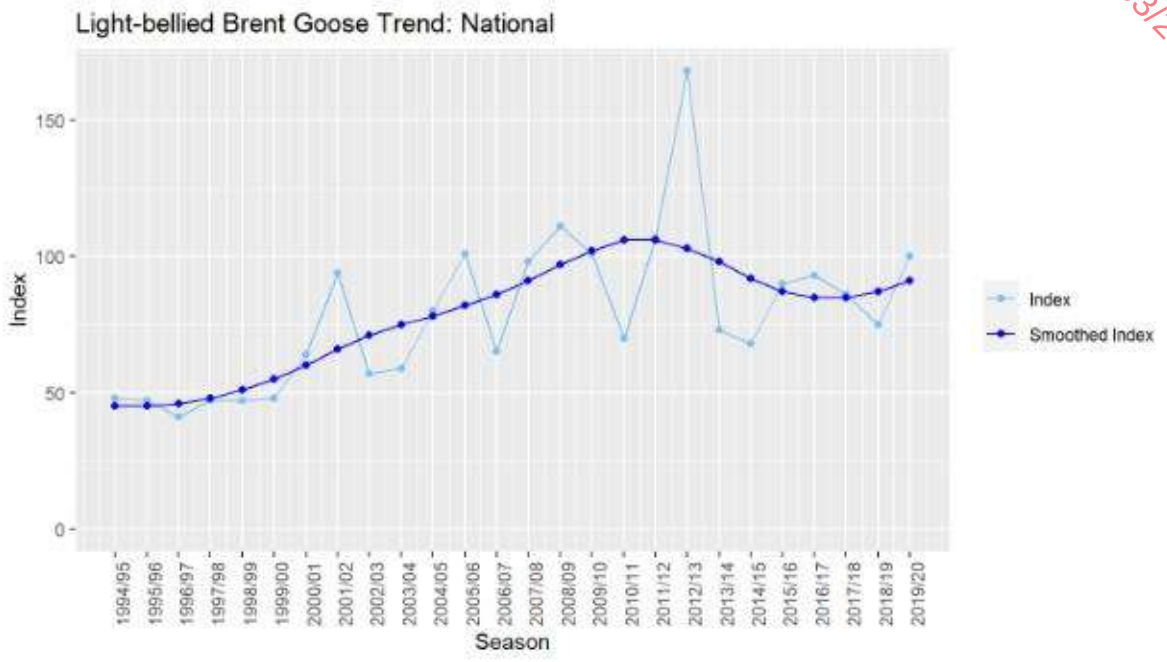
Site Summary

	Trend (%)			
Species	Nanny Estuary & shore - 5 Year	Nanny Estuary & shore - 12 Year	Nanny Estuary & shore - 23 Year	Long Term Trend
Golden Plover	-35.3	-75.7	-85.9	Large Decline
Cormorant	-32.1	-90.6	-81.1	
Bar-tailed Godwit	-71.6	-78.8	-75.9	
Grey Plover	-58.5	-80.1	-75.1	
Dunlin	-59.7	-51.2	-44.3	Moderate Decline
Turnstone	-50.0	-74.5	-43.6	
Sanderling	-75.3	-71.4	-29.5	
Lapwing	118.6	-11.3	-29.3	
Ringed Plover	-50.0	-68.3	-23.2	Intermediate Decline
Mallard	34.5	-35.1	-6.3	
Oystercatcher	32.3	-45.6	28.4	Stable or Increasing
Curlew	9.7	-32.0	47.8	
Knot	32.1	-75.2	76.2	
Light-bellied Brent Goose	-42.3	-48.6	133.3	
Redshank	-15.7	-26.3	311.8	
Teal	40.0	157.9	1533.3	
Black-tailed Godwit	27.4	116.1	1916.7	

Appendix IIc – I-WeBS National Trends of relevant species recorded in this report.

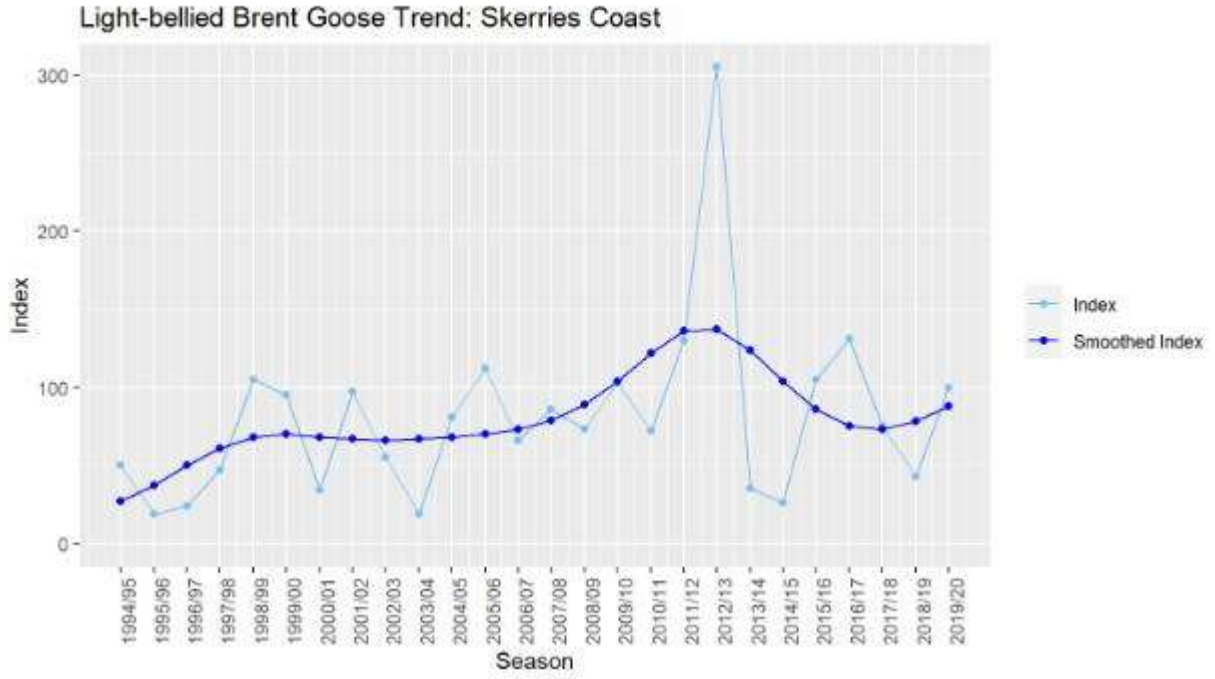
Light-bellied Brent Goose

	Trend (%)		
Site	5 Year	12 Year	23 Year
National	-11.2	1.2	93.3

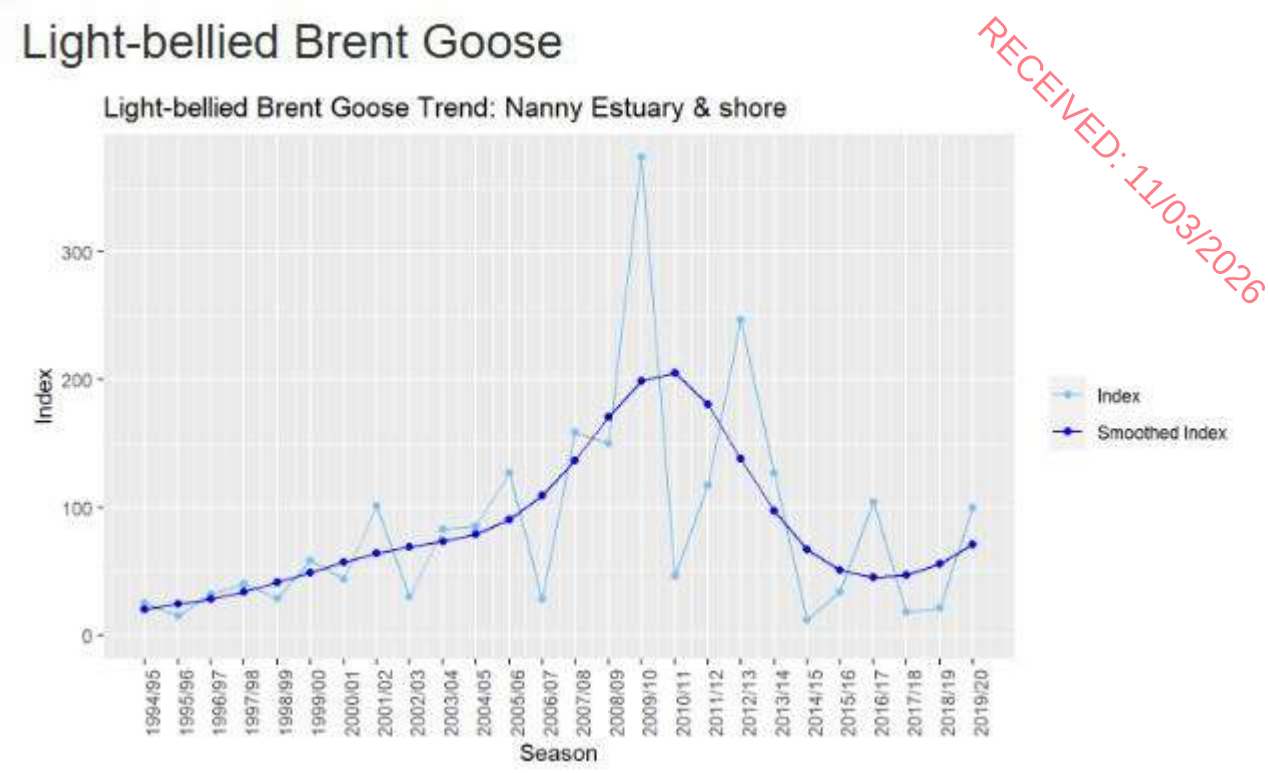


Appendix IId – I-WeBS Skerries Coast (site code OU904) trends of relevant species recorded in this report.

Light-bellied Brent Goose



Appendix IIe – I-WeBS Nanny Shore & Estuary (site code OV401) trends of relevant species recorded in this report.



Appendix III -Site Survey

The most recent site assessment was carried out on the 14th August 2025. Habitats within the proposed development site were classified according to Fossitt (2000) (Figure A.1) and the species noted within each habitat are described.

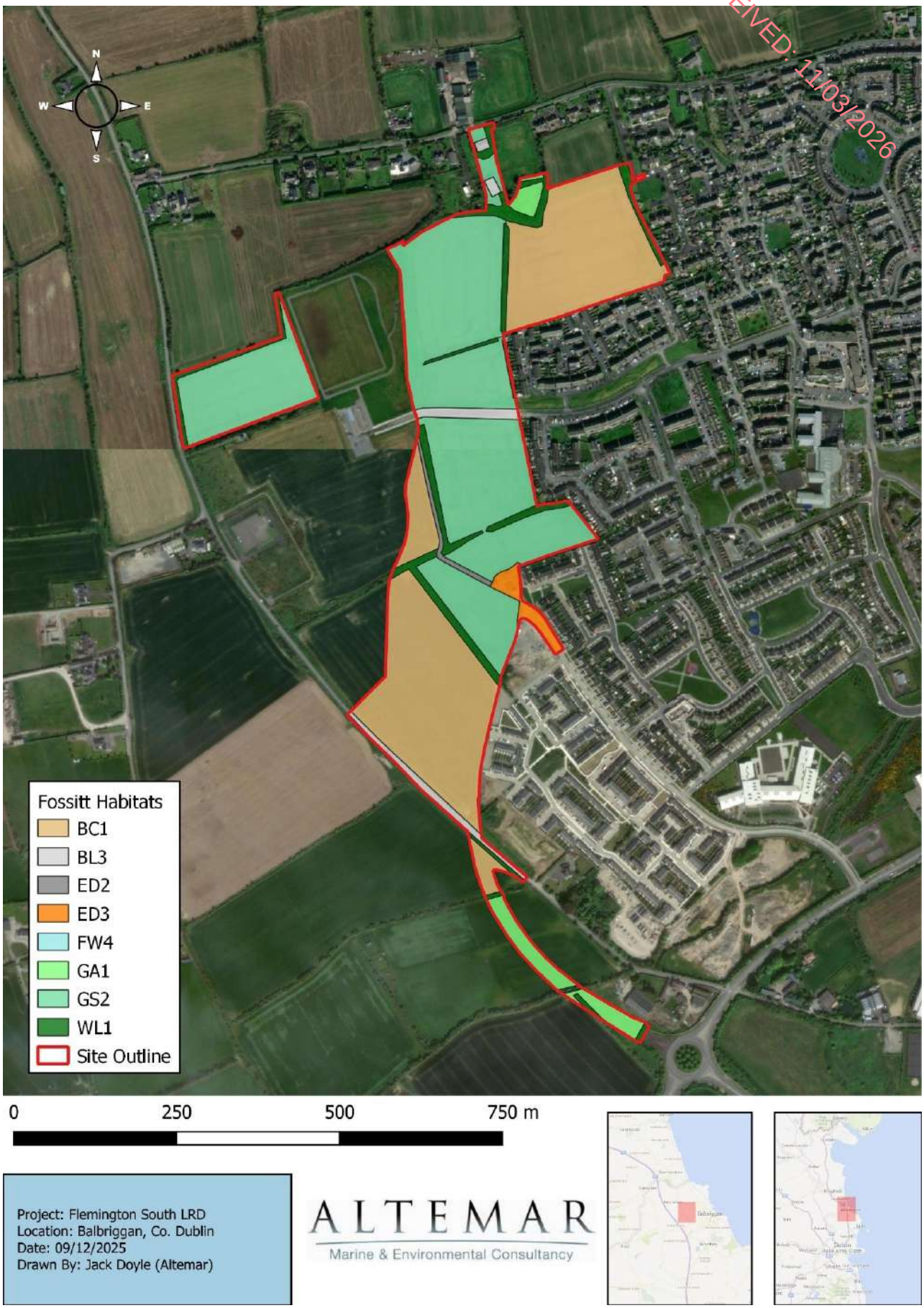


Figure A.1: Fossitt Habitats onsite

BC1 Arable crops

A number of arable crop fields (BC1) are located throughout the site. These habitats were dominated by wheat (*Triticum aestivum*). Opportunistic flora species were present. Species noted included creeping buttercup (*Ranunculus repens*), ramping fumitory (*Fumaria muralis*), corn marigold (*Glebionis segetum*), thistles (*Cirsium spp.*), dandelion (*Taraxacum spp*.), docks (*Rumex spp*.), and common vetch (*Vicia sativa*). No species of conservation importance were noted.

Plate 1. Arable crops BC1

BL3- buildings and artificial surfaces

Buildings and artificial surfaces consist of roads including a newly constructed road which traverses the site. A metal barn (Plate 2) and derelict house (Plate 3) are located to the north of the site. Bat assessments were carried out and no bats were noted roosting in the buildings on site. It is important to note however that approximately 16 barn swallows (Hirundo rustica) (Amber listed) were nesting in the metal barn.

Plate 2. BL3 – Metal Barn with nesting swallows

Plate 3. BL3 – Derelict House

ED3 Recolonising Bare Ground

As can be seen from figure A.1, a pocket of Recolonising Bare Ground has developed in the southeastern portion of the site in previously cleared ground. In this area, previously grown crops have not been replanted and therefore consists of an area of Recolonising Bare Ground. This site is being recolonised by opportunistic species such as dandelion (*Taraxacum spp*.), clover (*Trifolium spp*.), docks (*Rumex spp*.), thistles (*Cirsium arvense & C. vulgare*), willowherb (*Epilobium parviflorum*), pineappleweed (*Matricaria discoidea*), and ragwort (*Jacobaea vulgaris*).

FW4-Drainage ditch

As detailed in the Hydrology Chapter (see Section 6.3.1), the site is drained by manmade ditches which may convey flow to the east / southeast towards the Clonard Brook Stream, Clogheder Stream and Bremore Stream during periods of heavy rainfall. Further, the Hydrology Chapter indicates that these ditches only serve the subject site and agricultural fields immediately west and do not convey any upstream watercourse.

During the site inspections carried out by Altemar, a number of drainage ditches were observed along field boundaries and the base of linear hedgerows. However, no standing or flowing water was observed in any of these habitats. No reptiles / amphibians, or features suitable for reptiles / amphibians, were recorded along these habitats.

The only drainage ditch to display standing water during Altemar's site inspections is located to the southeast of the subject site (see Figure A.1). This drainage ditch appears to serve the adjacent agricultural fields to the north and south. Standing water was observed within this habitat, with lady-fern (*Athyrium filix-femina*) growing along its banks. No reptiles / amphibians were recorded within this surface water feature, however, this habitat is suitable for these species.

GA1-Improved agricultural grassland

This habitat is located to the south of the subject site. This habitat comprises of species-poor grassland with a short sward resulting from grazing practices (sheep noted within these fields). Species recorded include dandelion (Taraxacum spp.), clover (*Trifolium spp*.), docks (*Rumex spp*.), and thistles (*Cirsium arvense & C. vulgare*).

Plate 4. GA1-Improved agricultural grassland

GS2-Dry meadows and grassy verges

Throughout the centre and northern portions of the site, GS2 – Dry meadows and grassy verges habitats have developed from land previously utilised for arable crops (as evident in 2023 flora survey). These areas were not planted with arable crops in the intervening years, and opportunistic grassland species encroached onto these areas. These habitat pockets are dissected by a number of trails, established by dogwalkers from the adjacent residential developments (observed by surveyor). Species noted within this habitat included Thistles (*Cirsium spp.*), bush vetch (*Vicia sepium*), bramble (*Rubus fruticosus agg*), creeping buttercup (*Ranunculus repens*), nettle (*Urtica dioica*), Dandelion (*Taraxacum* spp.), dock (*Rumex spp*.), groundsell (*Senecio vulgaris*), broad bean (*Vicia faba*), gorse (*Ulex europaus*), birdsfoot trefoil (*Lotdiasyus corniculatus*), greater plantain (*Plantago major*), white clover (*Trifolium repens*), ragwort (*Jacobaea vulgaris*), wild radish (*Raphanus raphanistrum*), smooth hawksbeard (*Crepis capillaris*), tufted vetch *(Vicia cracca*), rose-bay willowherb (*Chamaenerion angustifolium*), nipplewort (*Lapsana communis*), marigold (*Glebionis spp*.), scarlet pimpernel (*Anagallis arvensis*), spiny sowthistle (*Sonchus asper*).

Plate 5. GS2-Dry meadows and grassy verges

WL1- Hedgerows

Hedgerows were noted within the site on the field boundaries (Plate 6). These varied significantly in their condition and have been unmanaged for several years. Proximate to the building to the north of the site a cluster of semi mature ash (*Fraxinus excelsior*) (with ash dieback noted) formed the field boundaries. The remainder of the site had more traditional hedgerows. However, the condition varied considerably from linear mature traditional hedgerow (Plate 6) to fractured hedgerow dominated by bramble. Species including elder (*Sambucus nigra)*, blackthorn (*Prunus spinosa)*, hawthorn *(Crataegus monogyna),* holly *(Ilex aquifolium),* common fumitory *(Fumaria officinalis),* dog-rose *(Rosa canina),* bramble *(Rubus fruticosus agg.), hedge bindweed (Calystegia sepium), cleavers (Galium aparine),* willow (*Salix sp.*), gorse (*Ulex europaus*), sycamore *(Acer pseudoplatanus),* ash *(Fraxinus excelsior),* ivy *(Hedera helix)* and cleavers *(Galium aparine)* were noted.

The historic Spring is known as 'Lady Well' was noted within a hedgerow habitat to the north of the subject site. This feature did not display a surface expression of a well structure (although one could be concealed by overgrowth of vegetation) and did not display any significant surface water discharge to the surrounding environment. No reptiles / amphibians were recorded within this feature.

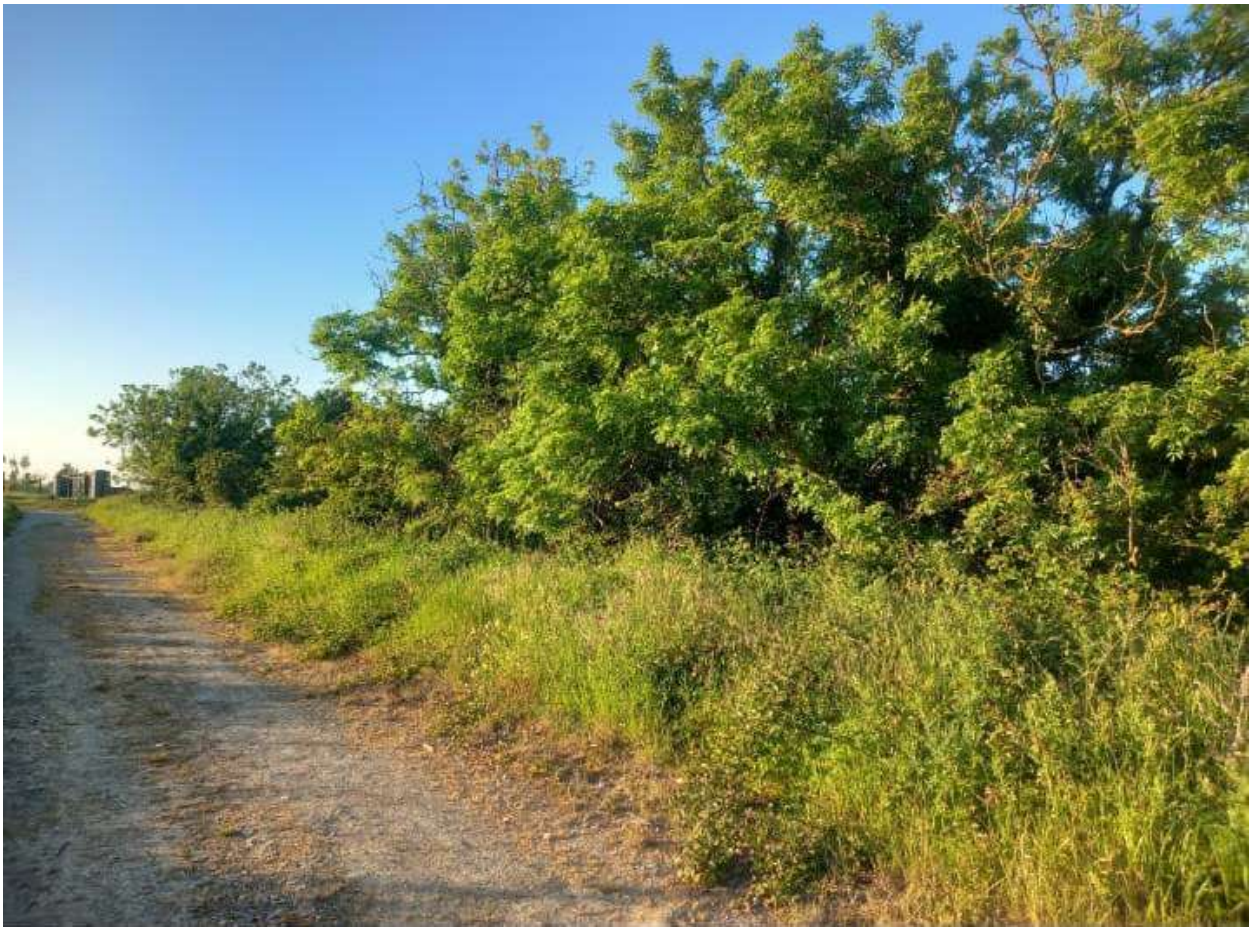


Plate 6. Hedgerow dissecting centre of site

Evaluation of Habitats

The proposed development site consists primarily of arable crops with grassland, recolonising bare ground, dry meadows and grassy verges, derelict structures and hedgerows. No habitats of conservation importance were noted on site.