Screening Report for Appropriate Assessment of a proposed Large-scale Residential Development at Fortunestown Lane and Garter Lane, Saggart, Co. Dublin

Compiled by OPENFIELD Ecological Services

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for Greenacre Residential DAC

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Introduction

Biodiversity is a contraction of the words ‘biological diversity’ and describes the enormous variability in species, habitats and genes that exist on Earth. It provides food, building materials, fuel and clothing while maintaining clean air, water, soil fertility and the pollination of crops. A study by the Department of Environment, Heritage and Local Government placed the economic value of biodiversity to Ireland at €2.6 billion annually (Bullock et al., 2008) for these ‘ecosystem services’.

All life depends on biodiversity and its current global decline is a major challenge facing humanity. In 1992, at the Rio Earth Summit, this challenge was recognised by the United Nations through the Convention on Biological Diversity which has since been ratified by 193 countries, including Ireland. Its goal to significantly slow down the rate of biodiversity loss on Earth has been echoed by the European Union, which set a target date of 2010 for halting the decline, however this was not achieved. In 2010 in Nagoya, Japan, governments from around the world set about redoubling their efforts and issued a strategy for 2020 called ‘Living in Harmony with Nature’ however none of these targets were achieved. In December 2022, the Kunming-Montreal Global biodiversity framework was agreed with the headline of ‘living in harmony with nature’. This has set ambitious goals to not only protect, but restore, nature, including by protecting 30% of land and sea by 2030.

In 2024 the fourth national biodiversity action plan was published to incorporate the goals set out in this framework, along with its commitments to the conservation of biodiversity under national and EU law.

The main legislation for conserving biodiversity in Ireland have been the Directive 2009/147//EC of the European Parliament and of the Council of November 2009 on the conservation of wild birds (Birds Directive) and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive). Among other things, these require member states to designate areas of their territory that contain important bird populations in the case of the former; or a representative sample of important or endangered habitats and species in the case of the latter. These areas are known as Special Protection Areas (SPA) and Special Areas of Conservation (SAC) respectively. Collectively they form a network of sites across the European Union known as Natura 2000. The Birds and Habitats Directives have been transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011-2015. A report into the economic benefits of the Natura 2000 network concluded that “there is a new evidence base that conserving and investing in our biodiversity makes sense for climate challenges, for saving money, for jobs, for food, water and physical security, for cultural identity, health, science and learning, and of course for biodiversity itself” (EU, 2013).

Unlike traditional nature reserves or national parks, Natura 2000 sites are not ‘fenced-off’ from human activity and are frequently in private ownership. It is the responsibility of the competent national authority to ensure that ‘good

conservation status' exists for their SPAs and SACs and specifically that Article 6(3) of the Habitats Directive is met. Article 6(3) states:

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

Sections 177U and 177V of the Planning and Development Act 2000 sets out the purpose of AA Screening is as follows:

A screening for appropriate assessment shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

The test at stage 1 AA Screening is that:

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

The test at stage 2 (Appropriate Assessment) is:

Whether or not the proposed development, individually or in-combination with other plans or projects would adversely affect the integrity of a European site.

However, where this is not the case, a preliminary screening must first be carried out to determine whether or not a full AA is required. This screening is carried out by South Dublin County Council.

The Purpose of this document

This document provides for the screening of a proposed development at Fortunestown Lane and Garter Lane, Saggart, Co. Dublin, and its potential effects in relation to Natura 2000 sites (SACs and SPAs).

This document will assess whether effects to the Natura 2000 network are likely to occur in accordance with Article 6(3) of the Habitats Directive and the Planning and Development (Amendment) Act, 2010.

About OPENFIELD Ecological Services

OPENFIELD Ecological Services is headed by Pádraic Fogarty who has worked for 25 years in the environmental field and in 2007 was awarded an MSc from Sligo Institute of Technology for research into Ecological Impact Assessment (EcIA) in Ireland. Since its inception in 2007 OPENFIELD has carried out numerous EcIAs for Environmental Impact Assessment (EIA), Appropriate Assessment in accordance with the EU Habitats Directive, as well as individual planning applications. Pádraic is a full member of the Institute of Environmental Management and Assessment (IEMA).

Guidance

This AA Screening Report has been undertaken in accordance with the following guidance:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision);
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10;
- *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* (European Commission, 2001);
- *Communication from the Commission on the precautionary principle* (European Commission, 2000); and,
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019).
- *Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission, 2021).

Methodology

The methodology for this screening statement is clearly set out in a document prepared for the Environment DG of the European Commission entitled 'Assessment of plans and projects significantly affecting Natura 2000 sites 'Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC' (Oxford Brookes University, 2001). Chapter 3, part 1, of this document deals specifically with screening while Annex 2 provides the template for the screening/finding of no significant effects report matrices to be used.

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

Step 1: Management of the Site
This determines whether the project is necessary for the conservation management of the site in question.

Step 2: Description of the Project
This step describes the aspects of the project that may have an impact on the Natura 2000 site.

Step 3: Characteristics of the Site
This process identifies the conservation aspects of the site and determines whether negative impacts can be expected as a result of the plan. This is done through a literature survey and consultation with relevant stakeholders – particularly the National Parks and Wildlife Service (NPWS). All potential effects are identified including those that may act alone or in combination with other projects or plans.

Using the precautionary principle, and through consultation and a review of published data, it is normally possible to conclude at this point whether potential impacts are likely. Deficiencies in available data are also highlighted at this stage.

Step 4: Assessment of Significance
Assessing whether an effect is significant or not must be measured against the conservation objectives for the Natura area in question.

If this analysis shows that significant effects are likely then a full AA will be required.

The steps are compiled into a screening matrix, a template of which is provided in Appendix II of the EU methodology.

Mitigation measures cannot be taken into account in an AA screening assessment.

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

<u>Screening Template as per Annex 2 of EU methodology:</u>

This plan is not necessary for the management of any SAC or SPA and so Step 1 as outlined above is not relevant.

Brief description of the proposed project

The proposed development will consist of modifications to the development permitted under Reg. Ref. SHD ABP-305563-19 which comprised 488no. apartments and 1,985sq.m of non-residential floorspace within 5no. blocks (Blocks A to E) ranging in height from 5 to 9 storeys. The proposed modifications relate to the previously permitted 5 storey Blocks C, D & E only and consist of an additional storey on each block and reconfiguration of the previously permitted floor levels to provide an additional 86no. apartment units and a total of 396no. apartments and 752sq.m of non-residential floorspace in lieu of the previously permitted 310no. apartments and 896sq.m of non-residential floorspace. Overall, the permitted Blocks A & B and the modified Blocks C, D & E will accommodate 574no. apartments and 1,841sq.m of non-residential floorspace. The modified blocks will consist of: - Block C: 6-storey block accommodating 129no. units (26no. 1 bed units, 84no. 2 bed units and 19no. 3 bed units) with 3no. retail/ commercial units (555sq.m) and a licensed café/ bar/ restaurant unit (197sq.m) at ground floor level fronting onto the permitted local square; Block D:- 6-storey block accommodating 140no. units (32no. 1 bed units, 90no. 2 bed units and 18no. 3 bed units), Block E: 6-storey block accommodating 127no. units (48no. 1 bed units, 65no. 2 bed units and 14no. 3 bed units) and all associated communal amenity spaces and private amenity spaces comprising terraces/ balconies. Permission is also sought for extension and modifications to the permitted single level basement below Blocks C, D and E to accommodate 332no. car parking spaces, cycle parking spaces, bulky item and bin storage areas with 2no. vehicular accesses provided from Parklands Parade. The modified ground level areas adjoining Blocks C, D and E include 10no. car parking spaces, cycle parking, public lighting, ESB substations, boundary treatments, hard and soft landscaping, surface water drainage infrastructure and all associated site development and infrastructure works. No modifications are proposed to the permitted Blocks A & B or the separate basement level area relating to Blocks A & B.

The main phases of this project include:

- site preparation. The proposed amendments will not alter the footprint of the permitted development.
- A construction phase using standard building materials. No material change will arise to the construction phase over and above the permitted development.
- Connection to water drainage, electricity and wastewater infrastructure networks.
- An operation phase whereby the development will be occupied.

The development site is located in Fortunestown which is located in the western portion of County Dublin and less than 1km east of the village of Saggart. The lands are currently under construction as part of permitted development and are surrounded on all sides by hard surfacing including residential homes, roads and the Luas line. Mapping from the Environmental Protection Agency (EPA) shows water courses running along both the eastern and western boundaries. To the east this is named as the Corbally Stream and this is a

tributary of the Camac River. The Camac in turn is a tributary of the River Liffey which enters the Irish Sea at Dublin Bay. Dublin Bay is subject to a number of Natura 2000 designations.

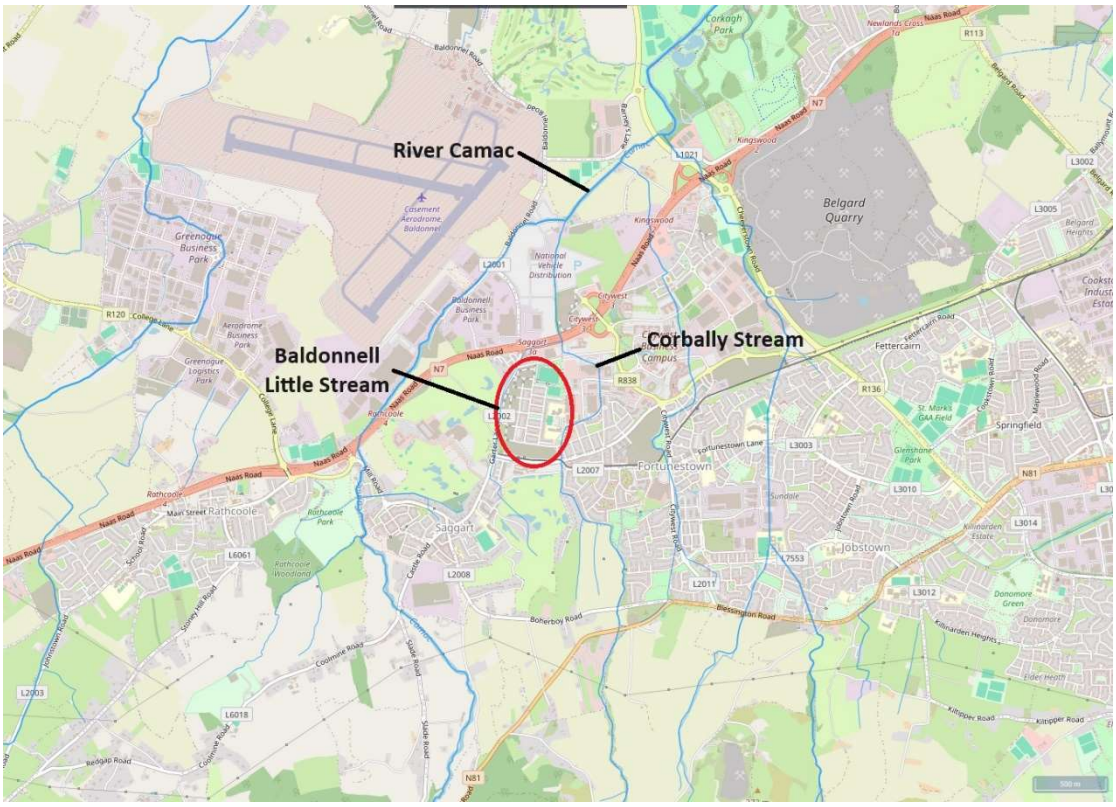

Figure 1 – Site location (red circle) showing proximity to water courses. Note there are no Natura 2000 sites in this view (from www.epa.ie)

The development lands are entirely composed of buildings and artificial surfaces with minimal vegetation and no semi-natural habitats. The lands comprise an area of undeveloped urban fringe and have most recently be used as construction compound areas relating to the ongoing residential development to the north at Parklands.

A survey of these lands was undertaken on the 4th of April 2017 as part of the parent planning application and this found no plants which are listed as alien invasive under Schedule 3 of SI No. 477. This survey found no examples of any habitat listed on Annex I of the Habitats Directive or habitats suitable for species listed on Annex II.

The development site is located adjacent to two water courses: the Baldonnell Lower Stream, which flows to the west, and the Corbally Stream which flows along the eastern boundary. They are both highly modified water courses in this location with substantial stretches culverted.

Any inert construction and demolition waste will be removed by a licenced contractor and disposed of in accordance with the Waste Management Act. The proposed amendments do not materially change the quantity of waste to be generated.

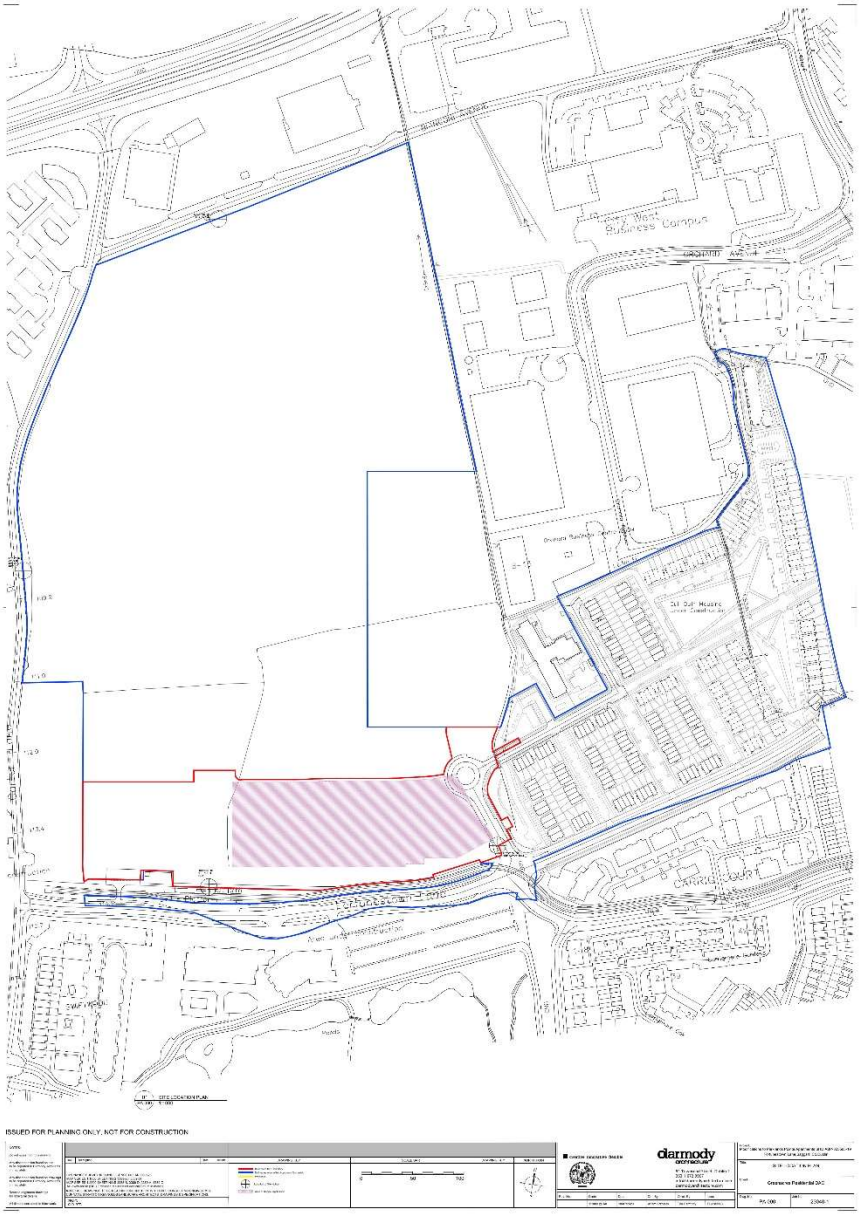

Figure 2 – Development site boundary (in red line).

Drainage for the proposed development has been designed as part of the wider Parklands development. The surface water strategy for the permitted development discharges run-off to the Corbally Stream and no changes to this approach are proposed. The surface water drainage system collects storm-water run-off generated from the development using traditional pipe-work and manholes laid along the main access roads collecting run-off from impermeable road surfaces via gullies and adjoining areas. Additional SUDS measures have been incorporated for reducing run-off volumes and improving run-off water quality as well as reducing the area of impermeable surfaces. Attenuation is provided in the form of a Linear Detention Basin situated in the proposed district park area in the north-east area, and which has been constructed. Surface water discharge rates from the site's main collection network is controlled by a Hydrobrake flow control device at the attenuation storage area before discharging to the Corbally stream at the north-east corner. The proposed

amendments will not affect the area of hard surfacing and so no change to the pattern of surface water run-off can arise.

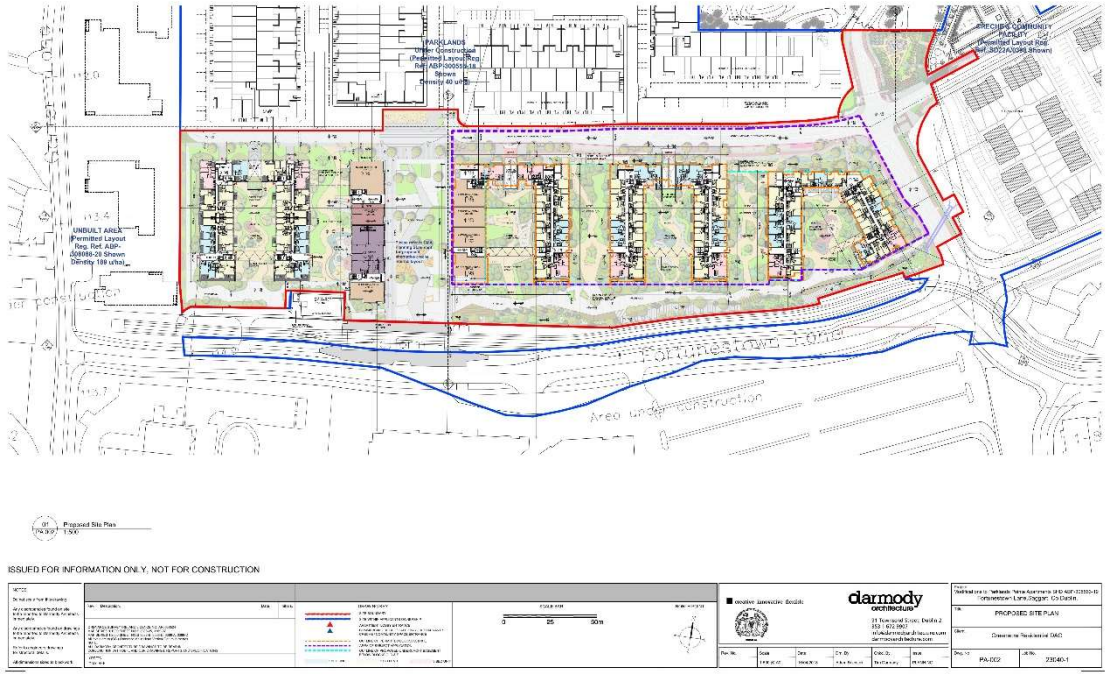

Figure 3 – Proposed site layout

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

Foul effluent from the permitted development will be sent to the wastewater treatment plant at Ringsend in Dublin. Emissions from the plant are currently not in compliance with the Urban Wastewater Treatment Directive. The Ringsend plant is licenced to discharge treated effluent by the EPA (licence number D0034-01) and is managed by Irish Water. It treats effluent for a population equivalent (P.E.) on average of 1.65 million however weekly averages can spike at around 2.36 million. This variation is due to storm water inflows during periods of wet weather as this is not separated from the foul network for much of the older quarters of the city.

The Annual Environmental Report for 2022, the most recent available, indicated that there were a number of exceedences of the emission limit values set under the Urban Wastewater Treatment Directive and these can be traced to pulse inflows arising from wet weather. In April 2019 Irish Water was granted planning permission to upgrade the Ringsend plant. This will see improved treatment standards and will increase network capacity by 50%. The proposed

amendments to the permitted scheme will increase the loading to the foul sewer however this cannot affect the treatment performance at Ringsend.

There are no other discharges from this operation.

Fresh water supply for the development will be via a mains supply. This may originate from in the Poulaphouca Reservoir.

There are no point air emissions from the site while some dust and noise can be expected during the construction phase.

Brief description of Natura 2000 sites

In assessing the zone of influence of this project upon Natura 2000 sites the following factors must be considered:

- Potential impacts arising from the project
- The location and nature of Natura 2000 sites
- Pathways between the development and the Natura 2000 network

It has already been stated that the development site is not located within or directly adjacent to any Natura 2000 site.

The Baldonnell Little Stream and Corbally Stream provide a natural hydrological connection from the development site to Dublin Bay. However, this pathway is extremely weak due to the large separation distance, c.20km. There is an indirect pathway through the stormwater and foul sewers *en route* to Dublin Bay and the Ringsend WWTP.

There are consequently pathways to a number of Natura 2000 sites. There are hydrological links to the **South Dublin Bay and River Tolka Estuary SPA** (site code: 4024), the **South Dublin Bay SAC** (site code: 0210), the **North Bull Island SPA** (site code: 4006), the **North Dublin Bay SAC** (site code: 0206) and the **North-West Irish Sea SPA** (site code: 4236).

Drinking water from the development may originate in the **Poulaphouca Reservoir SPA** (site code: 4063).

These are the only Natura 2000 sites within the zone of influence of the development as pathways do not exist to other areas.

North Dublin Bay SAC/North Bull Island SPA

The North Dublin Bay SAC (site code: 0206) is focussed on the sand spit on the North Bull island. The qualifying interests for it are shown in table 1. The status of the habitat is also given and this is an assessment of its range, area, structure and function, and future prospects on a national level and not within the SAC itself.

Table 1 – Qualifying interests for the North Dublin Bay SAC

Code	Habitat/Species	Status
1140	Mudflats and sandflats not covered by seawater at low tide	Inadequate
1310	Salicornia and other annuals colonizing mud and sand	Favourable
1330	Atlantic salt meadows	Inadequate
1410	Mediterranean salt meadows	Inadequate
1210	Annual vegetation of drift lines	Inadequate
2110	Embryonic shifting dunes	Inadequate
2120	Shifting dunes along the shoreline with Ammophila arenaria (white dunes)	Inadequate
2130	Fixed coastal dunes with herbaceous vegetation (grey dunes)	Bad
2190	Humid dune slacks	Inadequate
1395	*Petalophyllum ralfsii* Petalwort	Good

- **Annual vegetation of drift lines (1210)** This habitat of the upper shore is characterised by raised banks of pebbles and stones. They are inhabited by a sparse but unique assemblage of plants, some of which are very rare. The principle pressures are listed as gravel extraction, the building of pipelines and coastal defences.
- **Embryonic shifting dunes (2110).** As their name suggests these sand structures represent the start of a sand dune's life. Perhaps only a meter high they are a transient habitat, vulnerable to inundation by the sea, or developing further into white dunes with Marram Grass. They are threatened by recreational uses, coastal defences, trampling and erosion.
- **Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) (2120).** These are the second stage in dune formation and depend upon the stabilising effects of Marram Grass. The presence of the grass traps additional sand, thus growing the dunes. They are threatened by erosion, climate change, coastal flooding and built development.
- **Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130 – priority habitat).** These are more stable dune systems, typically located on the landward side of the mobile dunes. They have a more or less permanent, and complete covering of vegetation, the quality of which depends on local hydrology and grazing regimes. They are the most endangered of the dune habitat types and are under pressure from built developments such as golf courses and caravan parks, over-grazing, under-grazing and invasive species.
- **Humid dune slacks (2190).** These are wet, nutrient enriched (relatively) depressions that are found between dune ridges. During winter months or wet weather these can flood and water levels are maintained by a soil layer

or saltwater intrusion in the groundwater. There are found around the coast within the larger dune systems.

- **Petalwort (1395).** There are 30 extant populations of this small green liverwort, predominantly along the Atlantic seaboard but also with one in Dublin. It grows within sand dune systems and can attain high populations locally.

Site specific conservation objectives are available for this SAC (NPWS, 2013b) and are summarised as:

Atlantic/Mediterranean Salt Meadows (1330/1410)
Maintain habitat area and distribution including physical structure (sediment supply, creeks and pans, flooding regime). Maintain vegetation structure as measured by vegetation height, vegetation cover, typical species and sub-communities. Absences of the invasive *Spartina anglica.*

Annual vegetation of drift lines (code: 1210)
Habitat areas stable or increasing subject to natural variation; no decline in habitat distribution; maintain physical and vegetation structure without any physical obstructions, maintain vegetation structure and composition subject to natural variations.

Embryonic shifting dunes (code: 2110)
Habitat areas stable or increasing subject to natural variation; no decline in habitat distribution; maintain physical and vegetation structure without any physical obstructions, maintain vegetation structure and composition subject to natural variations.

Salicornia and other annuals colonising mud and sand (code: 3110)
Habitat area stable or increasing; no decline in habitat distribution; maintain physical and vegetation structure.

Fixed Coastal Dunes/Shifting Dunes (2130/2120)
Maintain habitat area and distribution including physical structure (functionality and sediment supply, percentage of bare ground, sward height). Maintain vegetation structure as measured by zonation, vegetation cover, typical species and sub-communities. Absences of the invasive *Hippophae rhamnoides.*

Humid dune slacks (code: 2190)
Area increasing, subject to natural processes including erosion and succession; No decline or change in habitat distribution, subject to natural processes; Maintain the natural circulation of sediment and organic matter, without any physical obstructions; Maintain natural hydrological regime; Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession; Bare ground should not exceed 5% of dune slack habitat, with the exception of pioneer slacks

which can have up to 20% bare ground; Maintain structural variation within sward; Maintain range of subcommunities with typical species; Maintain less than 40% cover of creeping willow (Salix repens); Negative indicator species (including non-natives) to represent less than 5% cover.

Petalwort *Petalophyllum ralfsii* (code: 1395)
No decline in known populations. No decline in population, estimated at 5,824 thalli. No decline in area of suitable habitat. Maintain hydrological conditions; maintain open, low vegetation, with a high percentage cover of bryophytes (small acrocarps and liverwort turf) and bare ground.

The North Bull Island SPA (site code: 0206) is largely coincident with the North Dublin Bay SAC with the exception of the terrestrial portion of Bull Island. Table 2 lists its features of interest

Table 2 – Features of interest for the North Bull Island SPA

North Bull Island SPA	National Status
Light-bellied Brent Goose *Branta bernicla hrota*	Amber (Wintering)
Oystercatcher *Haematopus ostralegus*	Red (Breeding & Wintering)
Teal *Anas crecca*	Amber (Breeding & Wintering)
Pintail *Anas acuta*	Amber (Wintering)
Shoveler *Anas clypeata*	Amber (Wintering)
Shelduck *Tadorna tadorna*	Amber (Breeding & Wintering)
Golden Plover *Pluvialis apricaria*	Red (Breeding & Wintering)
Grey Plover *Pluvialis squatarola*	Red (Wintering)
Knot *Calidris canutus*	Red (Wintering)
Sanderling *Calidris alba*	Green (Wintering)
Dunlin *Calidris alpina*	Red (Breeding & Wintering)
Black-tailed Godwit *Limosa limosa*	Red (Wintering)
Bar-tailed Godwit *Limosa lapponica*	Red (Wintering)
Curlew *Numenius arquata*	Red (Breeding & Wintering)
Redshank *Tringa totanus*	Red (Breeding & Wintering)
Turnstone *Arenaria interpres*	Amber (Wintering)
Black-headed Gull *Larus ridibundus*	Amber (Breeding)
Wetlands & Waterbirds	

- **Oystercatcher.** Predominantly coastal in habit Oystercatchers are resident birds whose numbers continue to expand in Ireland.
- **Teal**. In winter this duck is widespread throughout the country. Land use change and drainage however have contributed to a massive decline in its breeding range over the past 40 years.
- **Pintail**. Dabbling duck wintering on grazing marshes, river floodplains, sheltered coasts and estuaries. It is a localised species and has suffered a small decline in distribution in Ireland for unknown reasons.
- **Shoveler**. Favoured wintering sites for this duck are inland wetlands and coastal estuaries. While there have been local shifts in population and distribution, overall their status is stable in Ireland.
- **Knot.** These small wading birds do not breed in Ireland but gather in coastal wetlands in winter. Their numbers have increased dramatically since the mid-1990s although the reasons for this are unclear.
- **Sanderling.** This small bird breeds in the high Arctic and winters in Ireland along sandy beaches and sandbars. Its wintering distribution has increased by 21% in the previous 30 years.
- **Dunlin.** Although widespread and stable in number during the winter season, the Irish breeding population has collapsed by nearly 70% in 40 years. Breeding is now confined to just seven sites in the north and west as habitat in former nesting areas has been degraded.
- **Black-tailed Godwit.** Breeding in Iceland these waders winter in selected sites around the Irish coast, but predominantly to the east and southern halves. Their range here has increase substantially of late.
- **Curlew.** Still a common sight during winter at coastal and inland areas around the country it breeding population here has effectively collapsed. Their habitat has been affected by the destruction of peat bogs, afforestation, farmland intensification and land abandonment. Their wintering distribution also appears to be in decline.
- **Redshank.** Once common breeders throughout the peatlands and wet grasslands of the midlands Redshanks have undergone a 55% decline in distribution in the past 40 years. Agricultural intensification, drainage of wetlands and predation are the chief drivers of this change.
- **Turnstone.** This winter visitor to Irish coasts favours sandy beaches, estuaries and rocky shores. It is found throughout the island but changes may be occurring due to climate change.
- **Black-headed Gull.** Widespread and abundant in winter these gulls are nevertheless considered to be in decline. The reasons behind this are unclear but may relate to the loss of safe nesting sites, drainage, food depletion and increase predation.

Site specific conservation objectives have been published for this SPA (NPWS, 2015a) and are similar for each bird species. They can be summarised as:

Birds (similar for all species)
Long term population trend stable or increasing; there should be no significant decrease in the numbers or range of areas used by waterbird species, other than that occurring from natural patterns of variation

Wetlands
The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 1,713 hectares, other than that occurring from natural patterns of variation

The **South Dublin Bay and Tolka Estuary SPA (side code: 4024)**
This SPA is largely coincident with the South Dublin Bay SAC boundary with the exception of the Tolka Estuary. These designations encompass all of the intertidal areas in Dublin Bay from south of Bull Island to the pier in Dun Laoghaire. Wintering birds in particular are attracted to these areas in great number as they shelter from harsh conditions further north and avail of the available food supply within sands and soft sediments. Table 6 lists the features of interest.

- **Light-bellied Brent Goose.** There has been a 67% increase in the distribution of this goose which winters throughout the Irish coast. The light-bellied subspecies found in Ireland breeds predominantly in the Canadian Arctic.
- **Sanderling.** This small bird breeds in the high Arctic and winters in Ireland along sandy beaches and sandbars. Its wintering distribution has increased by 21% in the previous 30 years.
- **Dunlin.** Although widespread and stable in number during the winter season, the Irish breeding population has collapsed by nearly 70% in 40 years. Breeding is now confined to just seven sites in the north and west as habitat in former nesting areas has been degraded.
- **Knot.** These small wading birds do not breed in Ireland but gather in coastal wetlands in winter. Their numbers have increased dramatically since the mid-1990s although the reasons for this are unclear.
- **Black-headed Gull.** Widespread and abundant in winter these gulls are nevertheless considered to be in decline. The reasons behind this are unclear but may relate to the loss of safe nesting sites, drainage, food depletion and increase predation.
- **Ringed Plover.** This bird is a common sight around the Irish coast where it is resident. They breed on stony beaches but also, more recently, on cut-away bog in the midlands.
- **Oystercatcher.** Predominantly coastal in habit Oystercatchers are resident birds whose numbers continue to expand in Ireland.
- **Bar-tailed Godwit.** These wetland wading birds do not breed in Ireland but are found throughout the littoral zone during winter months. They prefer estuaries where there are areas of soft mud and sediments on which to feed.
- **Grey Plover.** These birds do not breed in Ireland but winter throughout coastal estuaries and wetlands. Its population and distribution is considered to be stable.
- **Roseate Tern.** This tern breeds at only a few stations along Ireland's east coast. Most of these are in decline although at Dublin their colony is increasing.
- **Common Tern.** This summer visitor nests along the coast and on islands in the largest lakes. Its breeding range has halved in Ireland since the 1968-1972 period.

- **Arctic Tern.** These long-distance travellers predominantly breed in coastal areas of Ireland. They have suffered from predation by invasive mink and are declining in much of their range.
- **Redshank.** Once common breeders throughout the peatlands and wet grasslands of the midlands Redshanks have undergone a 55% decline in distribution in the past 40 years. Agricultural intensification, drainage of wetlands and predation are the chief drivers of this change.

Bird counts form BirdWatch Ireland are taken from Dublin Bay as a whole and are not specific to any particular portion of the Bay. Dublin Bay is recognised as an internationally important site for water birds as it supports over 20,000 individuals. Table 3 shows the most recent count data available[1].

Table 3 – Mean count of birds species (qualifying interests of SPAs) for Dublin Bay from the Irish Wetland Birds Survey (IWeBS) from 2010 - 2020

Species	Mean
Light-bellied Brent Goose	3,453
Sanderling	500
Dunlin	5,951
Knot	5,093
Black-headed Gull	3,340
Ringed Plover	176
Oystercatcher	3,419
Bar-tailed Godwit	1,965
Grey Plover	328
Roseate Tern	0
Common Tern	23
Arctic Tern	0
Redshank	2,050
Teal	1,335
Pintail	184
Shoveler	101
Black-tailed Godwit	2,038
Curlew	882
Turnstone	272

There were also internationally important populations of particular birds recorded in Dublin Bay (i.e. over 1% of the world population): Light-bellied brent geese *Branta bernicula hrota*; Black-tailed godwit *Limosa limosa*; Knot *Calidris canutus* and Bar-tailed godwit *L. lapponica*.

[1] https://c0amf055.caspio.com/dp/f4db30005dbe20614b404564be88

Table 4 – Qualifying interests for the South Dublin Bay & River Tolka Estuary SPA (EU code in square parenthesis)

South Dublin Bay and Tolka Estuary SPA
Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]
Oystercatcher (*Haematopus ostralegus*) [A130]
Ringed Plover (*Charadrius hiaticula*) [A137]
Grey Plover (*Pluvialis squatarola*) [A140]
Knot (*Calidris canutus*) [A143]
Sanderling (*Calidris alba*) [A144]
Dunlin (*Calidris alpina*) [A149]
Bar-tailed Godwit (*Limosa lapponica*) [A157]
Redshank (*Tringa totanus*) [A162]
Black-headed Gull (*Croicocephalus ridibundus*) [A179]
Roseate Tern (*Sterna dougallii*) [A192]
Common Tern (*Sterna hirundo*) [A193]
Arctic Tern (*Sterna paradisaea*) [A194]
Wetlands & Waterbirds [A999]

Site specific conservation objectives have been published for this SPA (NPWS, 2015b) and are similar for each bird species. They can be summarised as:

Birds (similar for all species)
Long term population trend stable or increasing; there should be no significant decrease in the numbers or range of areas used by waterbird species, other than that occurring from natural patterns of variation

Wetlands
The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 2,192 hectares, other than that occurring from natural patterns of variation

The **South Dublin Bay SAC**

This SAC is concentrated on the intertidal area of Sandymount Strand (NPWS, 2015d). It has four qualifying interests: 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) and Embryonic shifting dunes (2110).

- **Annual vegetation of drift lines (1210)** This habitat of the upper shore is characterised by raised banks of pebbles and stones. They are inhabited by a sparse but unique assemblage of plants, some of which are very rare. The principle pressures are listed as gravel extraction, the building of pipelines and coastal defences.
- **Embryonic shifting dunes (2110).** As their name suggests these sand structures represent the start of a sand dune's life. Perhaps only a meter high they are a transient habitat, vulnerable to inundation by the sea, or developing further into white dunes with Marram Grass. They are threatened by recreational uses, coastal defences, trampling and erosion.
- **Tidal mudflats (1140)**. This is an intertidal habitat characterised by fine silt and sediment. The overall status of the habitat is inadequate and declining due to pollution from agriculture, forestry, wastewater sources and marine aquaculture.
- **Salicornia mudflats (1310)**: This is a pioneer saltmarsh community and so is associated with intertidal areas. It is dependant upon a supply of fresh, bare mud and can be promoted by damage to other salt marsh habitats. It is chiefly threatened by the advance of the invasive Cordgrass *Spartina anglica.* Erosion can be destructive but in many cases this is a natural process.

Site specific conservation objectives have been set out for mudflats in this SAC (NPWS, 2013c) and are summarised as:

Mudflats (code 1140)
Permanent habitat area stable or increasing (estimated at 720 hectares); Maintain the extent of the Zostera-dominated community, subject to natural processes; Conserve the high quality of the Zostera-dominated community, subject to natural processes; Conserve the following community type in a natural condition: Fine sands with Angulus tenuis community complex.

For other qualifying interests, only generic conservation objectives are available.

The **North-West Irish Sea SPA (site code: 4236)**

This is a large SPA that was designated in July 2023 and extends for 2,333km2 from Dublin Bay in the south to the southern tip of Dundalk Bay in the north. It encompasses marine and coastal areas while bordering a number of other SPAs in this region.

Table 5 – Qualifying interests for the North-West Irish Sea SPA (EU code in square parenthesis)

South Dublin Bay and Tolka Estuary SPA
Roseate Tern (*Sterna dougallii*) [A192]
Common Tern (*Sterna hirundo*) [A193]
Arctic Tern (*Sterna paradisaea*) [A194]
Little Tern (*Sterna albifrons*) [A195]
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 (*Croicocephalus 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]
Puffin (*Fratercula arctica*) [A204]
Razorbill (*Alca torda*) [A200]
Guillemot (*Uria aalge*) [A199]

- **Roseate Tern.** This tern breeds at only a few stations along Ireland's east coast. Most of these are in decline although at Dublin their colony is increasing.
- **Common Tern.** This summer visitor nests along the coast and on islands in the largest lakes. Its breeding range has halved in Ireland since the 1968-1972 period.

- **Arctic Tern.** These long-distance travellers predominantly breed in coastal areas of Ireland. They have suffered from predation by invasive mink and are declining in much of their range.
- **Little Tern.** Breeding colonies have declines in nearly all scattered Irish nesting localities over the past 40 years. On mainland colonies wardening, to prevent predation effects, is now crucial for long-term survival.
- **Common Scoter.** While a familiar winter visitor this duck breeds only in small numbers in lakes of Counties Galway, Mayo, Fermanagh and Sligo. A significant decline in numbers is evident and is attributed to pollution, predation by the invasive American Mink and the introduction of non-native coarse fish.
- **Great Northern Diver.** This Arctic breeding bird migrates to Irish waters for winter, preferring coastal waters but occasionally frequenting inland wetlands. Galway Bay, Donegal Bay and Blacksod/Tullaghan Bays are of international importance.
- **Red-throated Diver.** While common around the coast in winter this diver breeds only in the far north-west of Donegal. Here they nest in bog-pools and freshwater lakes, and only in small numbers.
- **Fulmar.** Resident seabird that nests on sea cliffs. Historically, the population is believed to have expanded as a result of fishing bycatch but recent declines may be linked to a reduction in fishing activity as well as climate change.
- **Manx Shearwater.** Summer visitor to Ireland where it breeds on grassy slopes on a small number of offshore islands.
- **Shag.** Nearly half of the global population of this seabird is to be found around Ireland and Britain. Its population has shown great fluctuation since counts began although the reasons for this are largely unknown. It is to be found around the Irish coast throughout the year.
- **Cormorant.** Wintering populations of this large, fish-eating bird have increased in Ireland since the early 1980s. Breeding also occurs widely along the coast and inland waterways. It is amber-listed due to a moderate decline in numbers.
- **Little Gull.** This gull is present in Ireland in winter with only a scattering of breeding records.
- **Kittiwake.** These vocal seagulls spend most of their time at sea, returning to favoured coastal sites for breeding. Nesting is on suitable rocky cliffs around the Irish coast. These Irish colonies are considered stable.
- **Common Gull.** Breeding sites for this gull in Ireland are confined to coastal locations, and mostly in the north and west. Their population is boosted by winter arrivals but again, there is a distinct coastal bias in their distribution.
- **Herring Gull.** This large gull breeds predominantly around the Irish coast and only occasionally inland. Numbers at these colonies have fallen by 60% since 1969, a decline which is attributed to a number of sources including a reduction in available food at landfill, botulism and predation.
- **Lesser Black-backed Gull.** The wintering range of this distinctive gull has expanded in Ireland by 55% since the early 1980s while breeding colonies have similarly increased.

- **Black-headed Gull.** Widespread and abundant in winter these gulls are nevertheless considered to be in decline. The reasons behind this are unclear but may relate to the loss of safe nesting sites, drainage, food depletion and increase predation.
- **Great Black-backed Gull.** This gull winters all around the coast of Ireland while summer breeding sites are predominantly coastal in character. Its range has declined by 30% since the late 1960s.
- **Razorbill.** This member of the auk family breeds exclusively at suitable coastal sites, where there are rocky cliffs to provide protection from predators. Indications are that populations at Irish colonies are stable.
- **Puffin.** This unmistakable auk spends the winter far out to sea, only coming to shore in the summer to breed. Colonies are scattered around the coasts and the birds face an uncertain future due to the scale of industrial fishing combined with climate change.
- **Guillemot.** This member of the auk family is found only near land during the breeding season. They nest on suitable rocky outcrops and cliffs where there is protection from predators. The population at four of Ireland's largest colonies is estimated to have increased by 22% over the past decade.

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

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

At its nearest point the **Poulaphouca Reservoir SPA** (site code: 4063) is located approximately 12km from the site of the proposed development. Its 'features of interest' include the Greylag Goose *Anser anser* and the Lesser Black-backed Gull *Chroicocephalus ridibundus*.

- **Greylag Goose.** Wintering Greylag Geese are very scattered in Ireland and occur on both coastal in inland sites. Their population has expanded greatly in their more northerly ranges (Iceland and Scotland) and this has coincided with losses elsewhere.
- **Black-headed Gull.** Widespread and abundant in winter these gulls are nevertheless considered to be in decline. The reasons behind this are unclear but may relate to the loss of safe nesting sites, drainage, food depletion and increase predation.

Generic conservation objectives only are available for this SPA (NPWS, 2022).

Pathway Analysis

There is a natural hydrological connection from the development site to Dublin Bay via surface water pathways, however this is very weak due to the large separation distance: c.20km. There is also an indirect pathway to Dublin Bay through the foul sewers via the Ringsend WWTP.

Sampling of water quality in Dublin Bay (and presented in the Annual Environmental Report for the WWTP) indicates that the discharge from the wastewater treatment plant is having an observable effect in the 'near field' of the discharge. This includes the inner Liffey Estuary and the Tolka Estuary, but not the coastal waters of Dublin Bay. This indicates that potential effects arising from the treatment plant are confined to these areas, and that the zone of influence does not extend to the coastal waters or the Irish Sea.

There are consequently pathways to a number of Natura 2000 sites. There are hydrological links to the South Dublin Bay and River Tolka Estuary SPA (site code: 4024), the South Dublin Bay SAC (site code: 0210), the North Bull Island SPA (site code: 4006), the North Dublin Bay SAC (site code: 0206) and the North West Irish Sea SPA (site code: 4236). The Poulaphouca Reservoir SPA (site code: 4063), from which drinking water supply for this development will originate, is also considered to fall within the zone of influence of this project.

Data collected to carry out the assessment

The site survey undertaken in April 2017 and the desktop reviews described above have found that the habitats on the development site are not associated with either habitats or species which are qualifying interests of any Natura 2000 site.

The EU's Water Framework Directive (WFD) stipulates that all water bodies must attain 'good ecological status' by 2015, or by 2027 with exemptions. This includes estuarine waters and Dublin Bay was originally located within the Eastern Region. In 2009 the first River Basin Management Plan (RBMP) was published to address pollution issues and included a 'programme of measures' which were to be completed. This plan was approved in 2010 (ERBD, 2010) while a second RBMP was published in 2018. A third RBMP is due for publication in 2024.

The River Camac (water body code: IE_EA_09C020250), which includes the Baldonnell Little and the Corbally streams) has been assessed by the Environmental Protection Agency (EPA) as 'moderate status' for the 2016-2021 reporting period (the most recent).

At Dublin Bay, the lower Liffey Estuary (water body code: IE_EA_090_0300) is also 'moderate'. The coastal water beyond the estuary (Dublin Bay, water body

code: IE_EA_090_0000) is assessed as 'good status'. The Tolka Estuary (water body code: IE_EA_090_0200) is 'poor status' and so is unsatisfactory (from www.epa.ie).

Details from the NPWS site synopsis report and the most recent data from BirdWatch Ireland's Wetlands Bird Survey (IWeBS) (Lewis et al., 2016) indicate that Dublin Bay is of international importance for wintering birds meaning that it regularly holds a population of over 20,000 birds.

Of the species listed in table 1 eleven: Curlew, Dunlin, Redshank, Shoveler, Oystercatcher, Grey Plover, Knot, Golden Plover, Bar-tailed Godwit, Black-tailed Godwit and Black-headed Gull are listed as of high conservation concern, and on BirdWatch Ireland's red list (Gilbert et al., 2021).

A 'supporting document' has been published by the NPWS which gives a detailed assessment of the features of interest for which SPAs in Dublin Bay have been designated (NPWS, 2014). In particular it presents information on the trends of these features and the pressures which are likely to affect these trends. It has determined that five species: Grey Plover, Shelduck, Pintail, Shoveler, Golden Plover and Black-headed Gull, are of unfavourable status while the remainder are 'favourable'. In the case of the Grey Plover it was found that its population trend is decreasing both within Dublin Bay and at an all-Ireland level. For this reason it is reasonable to assume that the factors for its decline are not unique to Dublin Bay. The Black-headed Gull population was not assessed in this way. Only for Shoveler is it considered that significant declines are being experience due to site conditions.

In 2020 the NPWS published a report entitled 'The monitoring and assessment of six EU Habitats Directive Annex I Marine Habitats' (Scally & Hewett, 2020). This report specifically assessed the status of the habitat: mudflats and sandflats not covered by seawater at low tide (1140) which is a qualifying interest of the North Dublin Bay SAC and the South Dublin Bay SAC. Table 22 of this report assessed the status of this habitat within both SACs as 'favourable'.

In June 2018 Irish Water applied for (and subsequently received) planning permission for works to the Ringsend Wastewater Treatment (WwTP) facility. As part of this application an Environmental Impact Assessment Report (EIAR) was submitted. Sections 5 and 6 of this EIAR related to Marine Biodiversity and Terrestrial Biodiversity respectively and each contained a section on the 'do-nothing scenario'. These review the effects to biodiversity in Dublin Bay in the absence of the upgrade works and so are relevant to this response. Extracts from these sections include:

"*If the Proposed WwTP Component is not constructed, the nutrient and suspended solid loads from the plant into Dublin Bay will continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity. […]*

If the status quo is maintained there will be little or no change in the majority of the intertidal faunal assemblages found in Dublin Bay which would likely continue to be relatively diverse and rich across the bay *[our emphasis]. Previous studies suggest that the outer and south bays are largely unaffected by the nutrient inputs from the WwTP at Ringsend and from the Liffey and Tolka rivers. Therefore, the sandy communities found in those areas will likely remain dominated by the same assemblage of Nepthys, tellinids and other pollution-sensitive species, albeit subjected to natural spatial and seasonal variations.*

However, the areas in the Tolka Estuary and North Bull Island channel will continue to be affected by the cumulative nutrient loads from the river Liffey and Tolka and the effluent from the Ringsend WwTP. These areas will likely continue to be colonised by opportunistic taxa tolerant of organic enrichment. There is a possibility that an increase in the nutrient outputs from the plant due to the operational overload and storm water discharges could result in a decline in the biodiversity of these communities as a result of low oxygen availability caused by increased organic enrichment. Considering the existing situation, it is possible that through the future oversupply of DIN to the area impacted by the existing outfall, benthic production could be adversely impacted due to hypoxic or even anoxic conditions. An increase in the cover of opportunistic macroalgae could lead to further deterioration in the lagoons in the North Bull as they add to the organic load on the benthos and further increase the BOD. These events, although localised, could deteriorate the biological status for Dublin Bay as a whole. ***Nonetheless, it is unlikely, as existing historical data suggests that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna*** *[our emphasis]. Although a localised decline could occur, it is not envisaged to be to a scale that could pose a threat to the shellfish, fish, bird or marine mammal populations that occur in the area. (section 5.7.1) […]*

If there is no change to the treatment process at Ringsend WwTP then the terrestrial environment adjacent to the site will remain largely unchanged *[our emphasis]. […]*

If the Proposed WwTP Component is not implemented, there is a possibility that an increase in the nutrient outputs from the plant due to operational overload and storm water discharges could result in a decline in the biodiversity of invertebrate communities in the Tolka Estuary and North Bull Island channel as a result of low oxygen availability caused by increased organic enrichment. An increase in the cover of opportunistic macroalgae could lead to further deterioration in the lagoons in the North Bull as they add to the organic load on the benthos and further increase the BOD. These events, although localised, could deteriorate the biological status for Dublin Bay as a whole. ***It is unlikely that they would have any significant impact on the waterbird populations that forage on invertebrates in Dublin Bay*** *[our emphasis] (section 6.5.1).*"

A graphic from the EIAR prepared by Irish Water in 2018 showed the zone of influence of the discharge from the Ringsend WwTP and this indicated that

effects from the discharge do not extend to the south side of the bay. This is reproduced in figure 5.

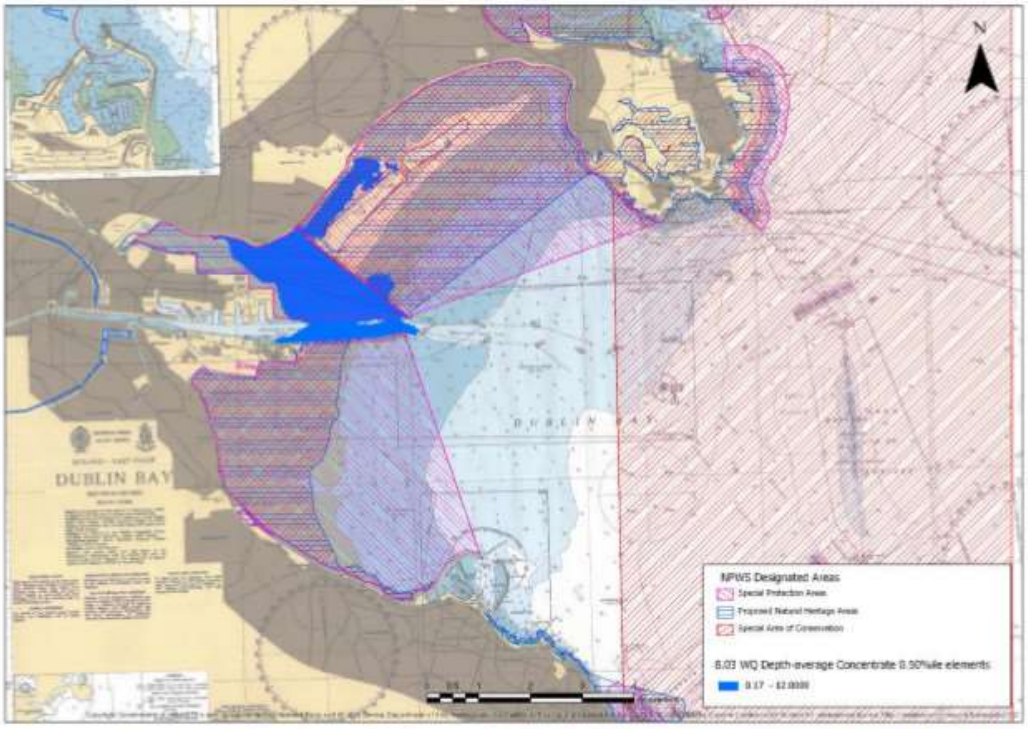

Figure 5-16: Extent of the Zone of Influence (in blue) of the effluent from the Proposed WwTP Component on the predicted modelled output for Winter depth averages 50%ile for Dissolved Inorganic Nitrogen (DIN)

Figure 5 – Extract from the EIAR prepared by Irish Water (2018) showing the zone of influence of the Ringsend WWTP outfall pipe.

The Assessment of Significance of Effects

Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site.

In order for an effect to occur there must be a pathway between the source (the development site) and the receptor (the SAC or SPA). Where a pathway does not exist an impact cannot occur.

The proposed development is not located within, or directly adjacent to, any SAC or SPA.

Habitat loss
At its closest point the development site is approximately 16km away (as the crow flies) from the boundary of the Natura 2000 sites within Dublin Bay. In reality however this distance is greater (c.20km) as the drainage pathway follows the course of streams leading to the Camac and Liffey rivers. Because of this distance separating the two areas there is no pathway for loss or disturbance of species or habitats which are qualifying interests of the Natura 2000 sites.

There are no likely significant effects to Natura 2000 sites arising from this amendment proposal from this source.

Disturbance to birds/Ex-situ effects
The development site is too far from bird roosting areas in Dublin Bay to result in impacts from noise or other forms of human disturbance. There is no evidence that disturbance effects of this nature are negatively affecting features of interest (i.e. bird species) from these sources. The site itself does not contain habitat which is suitable for roosting or foraging birds associated with SPAs in Dublin Bay.

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

Light and noise
The project will result in no measurable additional noise and artificial lighting over and above the permitted scheme. No significant effects to Natura 2000 sites are likely to arise from this source.

Pollution
There is a pathway from the development site via surface and wastewater water flows to Dublin Bay via the River Liffey and the Ringsend wastewater treatment plant respectively.

A. Pollution from wastewater
The Ringsend plant is licenced to discharge treated effluent by the EPA (licence number D0034-01) and is managed by Irish Water. It treats effluent for a population equivalent (P.E.) on average of 1.65 million however weekly averages can spike at around 2.36 million. This variation is due to storm water inflows during periods of wet weather as this is not separated from the foul

network for much of the older quarters of the city. The Annual Environmental Report for 2022, the most recent available, indicated that there were a number of exceedences of the emission limit values set under the Urban Wastewater Treatment Directive and these can be traced to pulse inflows arising from wet weather.

While the issues at Ringsend wastewater treatment plant are being dealt with in the medium term evidence suggests that some nutrient enrichment is benefiting wintering birds for which SPAs have been designated in Dublin Bay (Nairn & O'Hallaran eds, 2012). No negative impacts to Natura 2000 sites can arise from the additional loading arising from this development as the evidence suggests that negative effects are not occurring to SACs or SPAs from water quality.

The likely addition to the loading at Ringsend arising from this project is not likely to have significant effects on Natura 2000 sites.

B. Pollution from surface water
No changes to the extent of hard surfacing will arise as a result of this project and so no changes to the quality or quantity of surface water can occur.

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

C. Pollution during construction
Pollutants arising from construction run-off typically comprise of sediment and small quantities of hydrocarbon residues. This can also include cement and other substances which are toxic to aquatic life. In this case the proposed amendments will not measurably alter the risk posed to water bodies. In the event that pollutants were to enter the water courses near the development site, these would settle out of the water columns within short distance and could not travel the c.20km to Dublin Bay. Intertidal and marine habitats are not sensitive to sediment pollution in the way that freshwater habitats are and so for these reasons the risk to water quality in Natura 2000 sites from this development is negligible.

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

Abstraction
There is no evidence that abstraction is affecting the conservation objectives of any SAC or SPA within the zone of influence of this project, including the reservoirs at Poulaphouca.

This proposal will result in no measurable change to the demand for freshwater over and above the existing development. No significant effects to Natura 2000 sites are likely to arise from this source.

Are there other projects or plans that together with the project or plan being assessed could affect the site?

Individual impacts from one-off developments or plans may not in themselves be significant. However, these may become significant when combined with similar, multiple impacts elsewhere. These are sometimes known as cumulative impacts but in AA terminology are referred to as 'in combination' effects.

The EU's Water Framework Directive requires that all water bodies were to attain 'good ecological status' by 2015 (with some exceptions). The status of the Camac is currently unsatisfactory and a target of 2021 was set to achieve good status, however this has not been achieved.

Rainwater run-off from paved and impermeable surfaces can carry hydrocarbons and particulate matter into surface waters. These features can also accelerate the discharge of rainwater off land and so accentuate the effects of flash flooding (Mason, 1996). This impact is particularly pronounced in urban locations where significant areas can be paved or built on. As such, incremental increases in hard surfaces, such as when land use changes from agriculture to housing, can result in cumulative effects to water quality. In this case no impact from surface water is expected to occur.

Future planning in this area is provided for under the South Dublin County Development Plan 2022-2028. This Plan has been screened for AA and it was concluded that significant effects to the Natura 2000 network would not arise from its implementation. This proposal can be seen in combination with other planned and permitted development under this planning framework.

This project can be seen in combination with development of the lands in this vicinity either planned or underway. All development applications have been subject to AA Screening.

Given that negative effects are not considered likely to arise, there are no projects, which acting in combination with the current proposal, can result in significant effects to Nature 2000 areas.

<u>Conclusion and Finding of No Significant Effects</u>

Mitigation in an AA context is given as any measure which is introduced in order to avoid or reduce an impact to a Natura 2000 area. In this case no mitigation measures are suggested during either the construction or operation phases.

This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either individually or in combination with other plans or projects to the Natura 2000 network. This conclusion is based on best scientific knowledge.

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