APPROPRIATE ASSESSMENT SCREENING REPORT

FOR

MIXED USE RESIDENTIAL DEVELOPMENT

AT

CHADWICKS, SWORDS ROAD, SANTRY, D9

ON BEHALF OF

Dwyer Nolan Developments Ltd.

Prepared by
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1 INTRODUCTION

1.1 Background

Enviroguide Consulting was commissioned by Dwyer Nolan Developments Ltd. to prepare a screening for Appropriate Assessment in respect of the Proposed Mixed-use Development, at the Chadwicks Site, Swords Road, Santry, Dublin 9. This Appropriate Assessment Screening Report contains information to enable the Competent Authority to undertake Stage 1 Appropriate Assessment screening in respect of the Proposed Development.

1.2 Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs). SACs and SPAs are collectively known as Natura 2000 or European Sites. It is the responsibility of each member state to designate SPAs and SACs. SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the qualifying interests of the sites; from these the conservation objectives of the site are derived.

An 'Appropriate Assessment' (AA) is a required assessment to determine the likelihood of significant impacts, based on best scientific knowledge, of any plans or projects on European Sites. A screening for AA determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant effects on a European Site, in view of its conservation objectives.

This AA Screening has been undertaken to determine the potential for significant effects on relevant European Sites. The purpose of this assessment is to determine, the appropriateness, or otherwise, of the Proposed Development in the context of the conservation objectives of such sites.

1.2.1 Legislative Context

An Appropriate Assessment is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a European Site. Paragraph 3 states that:

"*6(3) 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."*

These obligations in relation to Appropriate Assessment have been implemented in Ireland under Part XAB of the Planning and Development Act 2000, as amended ("the 2000 Act"), and in particular Section 177U and Section 177V thereof. The relevant provisions of Section 177U in relation to AA screening have been set out below:

"***177U.—*** *(1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.*

(2)…

(3)…

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

(5) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is not required if it can be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site."

1.2.2 Stages of AA

This Appropriate Assessment Screening Report (the "**Screening Report**") has been prepared by Enviroguide Consulting. It considers whether the Proposed Development is likely to have a significant effect on a European Site and whether a Stage 2 Appropriate Assessment is required.

The AA process is a four-stage process, with issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

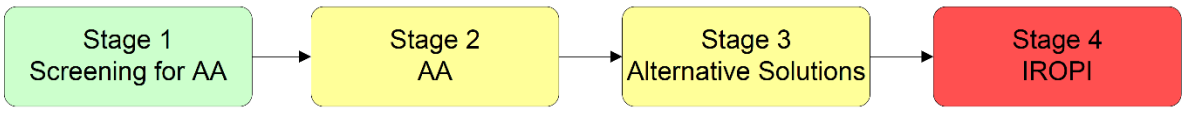

FIGURE 1. THE FOUR STAGES OF THE APPROPRIATE ASSESSMENT PROCESS (DEHLG, 2010).

The four stages of an AA, can be summarised as follows:

- Stage 1 *Screening* addresses:
  - whether a plan or project is directly connected to or necessary for the management of the site, or

    - whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European Site in view of its conservation objectives.
- Stage 2: *Natura Impact Statement (NIS)*. The second stage of the AA process assesses the impact of the project or plan (either alone or in combination with other projects or plans) on the integrity of the European Site, having regard to the conservation objectives of the site and its ecological structure and function. A NIS must provide the objective scientific information to enable the competent authority to carry out an appropriate assessment of the proposed development. It should describe any mitigation measures to avoid and reduce significant negative impacts.
- Stage 3: *Assessment of alternative solutions*. If the outcome of Stage 2 is negative i.e. adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.
- Stage 4: *Assessment where no alternative solutions exist and where adverse impacts remain.* The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European Site, where no less damaging solution exists.

2 METHODOLOGY

2.1 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).
- *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).
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021.*

2.2 Screening Steps

Screening for AA involves the following steps:

- Establish whether the plan or project is directly connected with or necessary for the management of a European Site.
- Description of the plan or project and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the European Site.
- Identification of European Sites potentially affected.
- Identification and description of potential effects on the European Site.
- Assessment of the likely significance of the effects identified on the European Site; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

2.3 Desk Study

A desktop study was carried out to collate and review information, datasets and documentation sources relevant for the completion of this Screening Report. The desktop study relied on the following sources:

- Information on the network of European Sites, boundaries, qualifying interests and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at *www.npws.ie*
- Text summaries of the relevant European Sites taken from the respective Standard Data Forms and Site Synopses available at *www.npws.ie*
- Information on species records and distributions, obtained from the National Biodiversity Data Centre (NBDC) at *www.maps.biodiversityireland.ie*
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.*gis.epa.ie*
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at *www.gsi.ie*
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland.
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from Dublin City Council.

For a complete list of the specific documents consulted as part of this assessment, see *Section 5 References*.

2.4 Field Study

2.4.1 Ecological surveys

A habitat Survey of the Site of the Proposed Development was conducted by Enviroguide on the 13th of May 2021. A bat survey of the Site of the Proposed Development was undertaken by Aishling Walsh of Ash Ecology and Environmental on the 28th of April 2021.

2.5 Assessment of Significant Effects

The potential for significant effects that may arise from the Proposed Development were considered through the use of key indicators, namely:

- Habitat loss or alteration
- Habitat/species fragmentation
- Disturbance and/or displacement of species
- Changes in population density
- Changes in water quality and resource

In addition, information pertaining to the conservation objectives of the European Sites, the ecology of the designated habitats and species and known or perceived sensitivities of the habitats and species were considered.

3 STAGE 1 SCREENING

3.1 Management of European Sites

The Proposed Development is not directly connected with or necessary to the management of European Sites. There are no European Sites located wither within or immediately adjacent to the Site of the Proposed Development.

3.2 Description of Proposed Development

3.2.1 Site location

The Site is located at the Chadwicks Site, Swords Road, Santry, Dublin 9. The Site is bound to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate and to the south by the permitted Santry Place development. Santry Demense lies 20m north of the Site.

3.2.2 Description of Development

The Proposed Development provides for 350 no. apartments comprised of 113 no. 1 bed, 218 no. 2 bed and 19 no. 3 bed dwellings, in 4 no. seven to fourteen storey buildings, over basement level, with 4 no. retail / commercial units, a medical suite / GP practice unit and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between blocks A and D.

The existing Chadwicks Builders Merchants building on Site (c. 4,196.8m^2) will be demolished. Vehicular access to the Proposed Development will be via 2 no. existing / permitted access

points on Santry Avenue in the north-west of the Site and off Swords Road in the south-east of the Site, as permitted under the adjoining Santry Place development (Ref. 2713/17).

The Proposed Development includes for all associated Site development works above and below ground, bin and bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

3.2.3 Existing and Proposed Water Infrastructure

The following information is extracted from the Engineering Services Report (DBFL Consulting Engineers, July 2021):

Watermains

It is proposed to connect to the existing 300mm diameter public watermain located on the Swords Road. A Pre-Connection Enquiry was submitted to Irish Water CDS20003546 and subsequent confirmation of feasibility letter states that connection is feasible subject to upgrades.

Foul Sewers

'*The foul sewerage from this development is proposed to discharge via gravity by means of a new 225mm diameter sewer out falling to a manhole constructed as part of the previously approved mixed-use development (Planning Ref: 2713/17 & 1737/19) to the south of this development. This will negate the requirement for any construction outside of the site boundary and minimise any disruption to the public.*'

A pre-connection enquiry was submitted to Irish Water (CDS20003546) and subsequent confirmation of feasibility letter states that the connection is feasible subject to upgrades.

'Any surface water from the basement car park generated by incidental run-off/spillage only will drain through an underground system of collector pipes, gullies and ACO drains which in turn will pass through a petrol interceptor prior to discharging into a foul pumping well located under the basement. The run-off will then be pumped via a rising main which will connect to the gravity foul drainage system for the site at ground level via an outfall manhole in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) and Irish Water.'

Foul sewers have been designed and will be constructed in accordance with the Irish Water's 'Standard Details for wastewater infrastructure' and 'Code of practice for wastewater infrastructure'. In addition, the foul sewers have been designed to Building Regulations and specifically in accordance with the principles and methods set out in EN 752:2008 and DOE 'Recommendations for Site Development Works'.

Surface Water

There is an existing 225mm diameter public surface water sewer located on the Swords Road (R104) to the east of the site.

'A surface water network is currently under construction within the previously approved mixed-use development (Planning Ref: 2713/17 & 1737/19), to the south of the Proposed Development. This system contains an attenuation system, hydrobrake and petrol interceptor on the outfall surface water sewer. This outfall sewer discharges to the existing 225mm

diameter sewer noted above and a connection to the public sewer has been made at the junction of the Swords Road with Schoolhouse Lane under permission of Dublin City Council. This connection has been approved under Planning Ref: 2713/17 & 1737/19.'

Surface water from the Proposed Development will discharge, once attenuated, and treated to a manhole constructed as part of the previously approved mixed-use development. A class 1 bypass petrol interceptor, placed under the aforementioned planning reference, has been designed to accommodate the combined permitted discharge rate from both the Proposed Development and the permitted development (Planning Ref: 2713/17 & 2737/19). The petrol interceptor 'Kingspan' NSBE010 bypass interceptor is designed to accommodate a flow rate of 10 l/s. The combined permissible discharge rate from both the Proposed Development and the previously approved development to the south is 8.9l/s.

Surface water management for the Proposed Development will be designed to comply with the 'Greater Dublin Strategic Drainage Study (GDSDS) Regional Drainage Policies Technical Document – Volume 2, New Developments, 2005' and the 'Greater Dublin Regional Code of Practice for Drainage Works, V6.0 2005'. CIRIA Design Manuals C753, C697 and C609 have also used to design the surface water drainage system within the Site.

Sustainable Drainage System (SuDS):
It is proposed to use a Sustainable urban Drainage System (SuDS) approach to stormwater management throughout the Site. SuDS measures included in the project design include:

- Extensive Green Roofs: A 66% provision of extensive green roof has been provided for the Site. Green roofs will consist of a planted roof area with low growing, low maintenance plants consisting of self-sustaining mosses, sedums, succulents, herbs or grasses over a drainage layer and waterproofing membrane. Green roofs provide ecological, aesthetic and amenity benefits and intercept, treat and retain rainfall, reducing the volume of runoff and attenuation peak flows.

- Intensive Green Roofs: Planted, accessible podium areas with high amenity benefits which include platers or trees over a drainage layer and waterproofing membrane providing similar to extensive green roofs.

- Catchpit Manhole: Catchpit manholes will be utilised to collect silt and debris from the surface water drainage system and prevent blockages. Catchpit manholes also help ensure proper function and reduced maintenance of treatment and storage systems downstream of the catchpit manhole.

- Permeable Pavement: It is proposed to use 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 slowly released to the drainage collection system through natural flow via the porous medium.

- Petrol Interceptor: The proposed drainage system includes the use of proprietary oil/water separators which prevent hazardous chemical and petroleum products entering watercourses and public sewers. There are 2no. petrol interceptors purposed for the Proposed Development. One is proposed within the basement of the building,

this will treat any incidental run off and before discharge to the public surface water network. A second petrol interceptor has been constructed as part of the previously approved mixed-use development (Planning Ref: 2713/17 & 2737/19).

The drainage infrastructure, including SuDS features with an online attenuation system, will be designed such that the catchment will drain to the public surface water network. The discharge rate from the proposed attenuation system will be controlled using a Hydro Brake Optimum or equivalent. The permissible surface water discharge for the Proposed Development is 5.0 l/s in accordance with the Greater Dublin Strategic Drainage Strategy (GDSDS).

The surface water drainage network, attenuation storage and site levels are designed to accommodate a 100-year storm event (Provision for 20% climate change included).

It is a policy of Dublin City Council (Policy SI18) '*to require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works*.' It is noted that these design features are a requirement in all new developments, as per the above policy; to contribute to both the improvement of water quality in receiving waterbodies and the easing of pressures on existing drainage networks. They are in **no way** being relied upon as a method of mitigating potential impacts to European Sites arising from the Proposed Development.

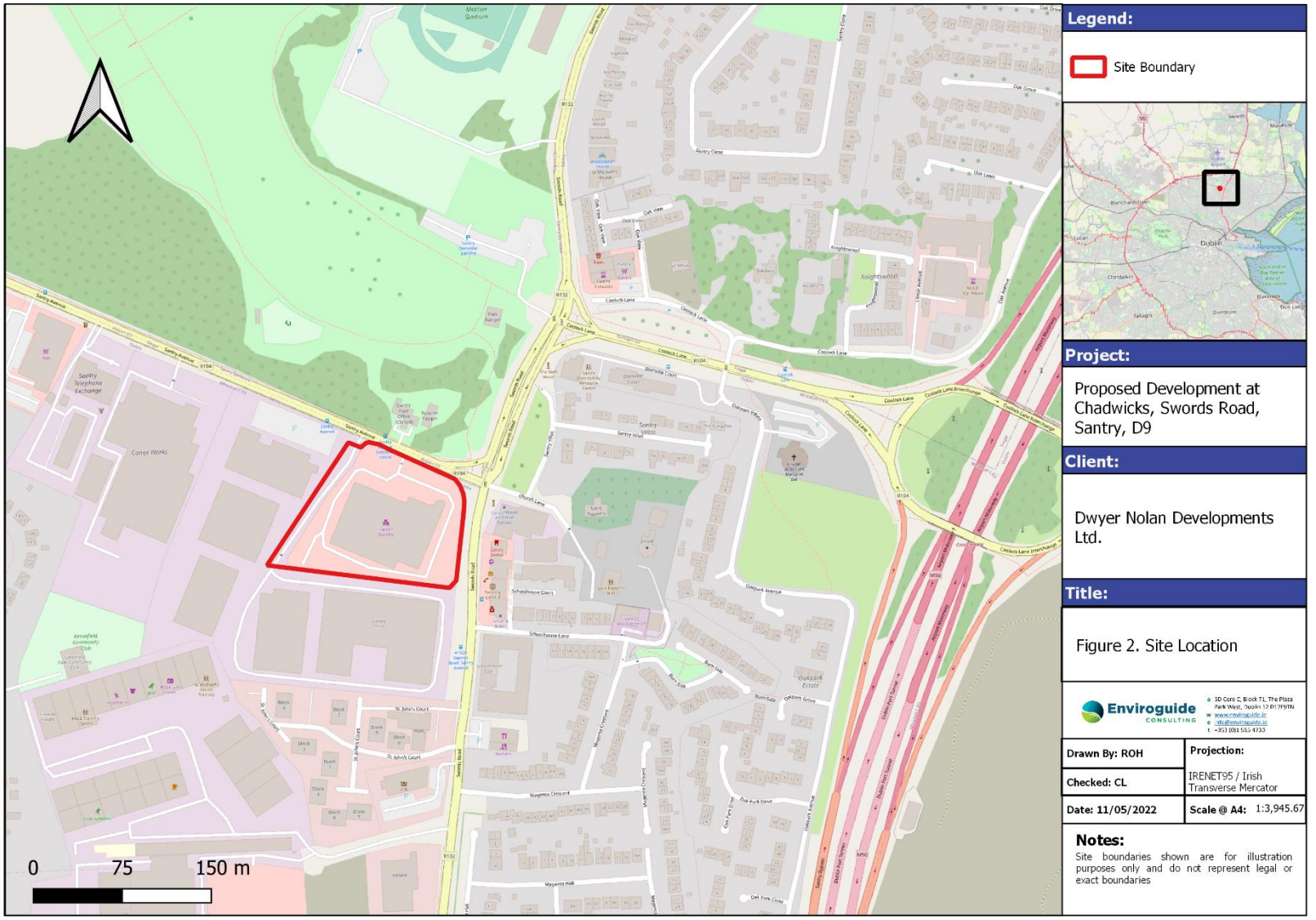

FIGURE 2. SITE LOCATION

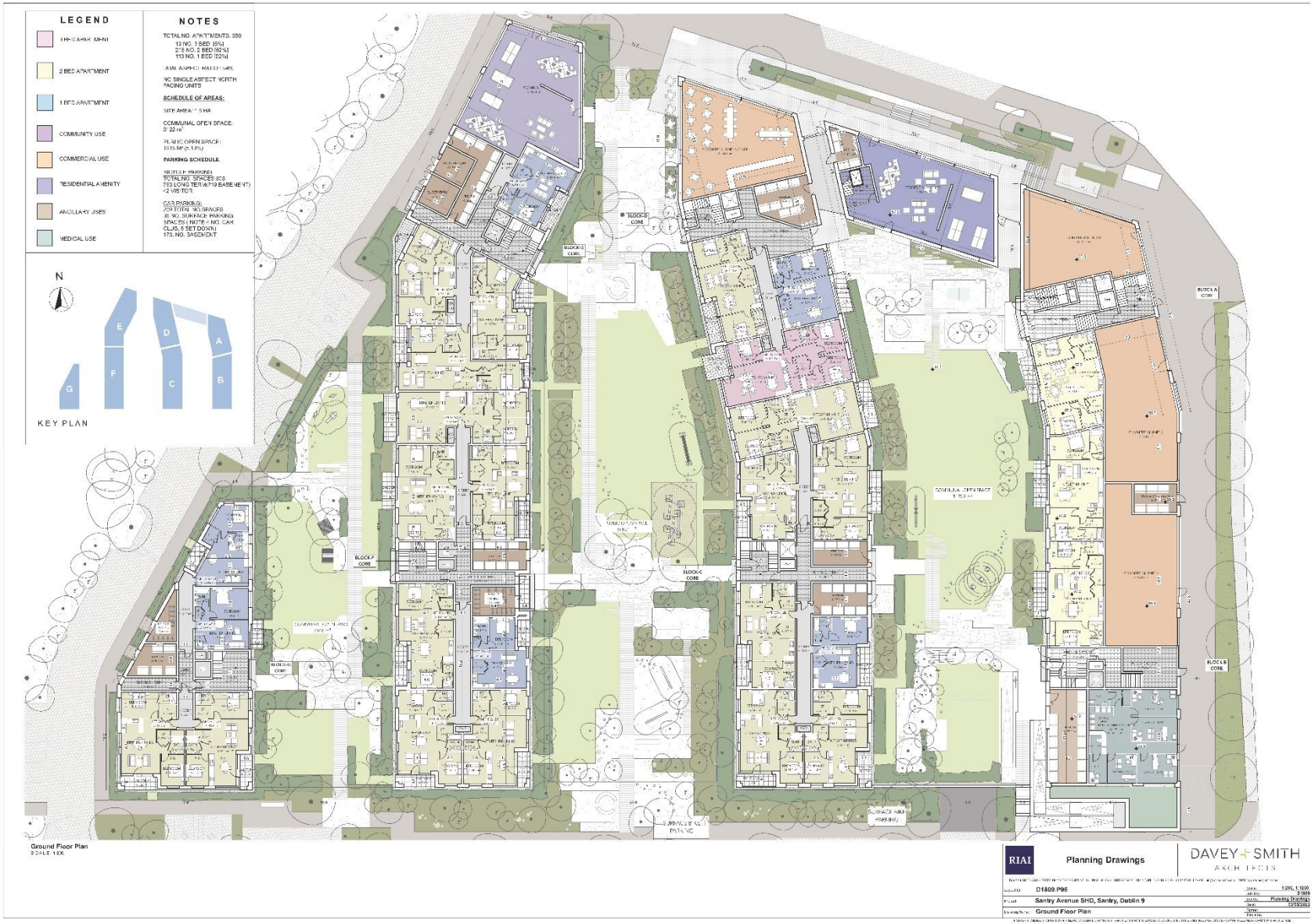

FIGURE 3. PROPOSED SITE LAYOUT (DAVEY SMITH, DRG. NO. D1809.P06)

3.3 Existing Environment

3.3.1 Surface Water

The Site is within the Liffey and Dublin Bay catchment, and Mayne_SC_010 SubCatchment. The Santry River is approximately 675m to the north of the Site and flows in a south-east direction to North Dublin Bay. The Santry River was assigned a Q-value of 2-3 *Poor status* in the most recent EPA monitoring survey carried out (2019, station code: RS09S010300). The Santry River has been assigned a Water Framework Directive (WFD) status of *Poor* by the EPA and the waterbody is *At Risk* of not meeting its WFD status objectives (EPA,2022).

The Santry River flows into the North Bull Island transitional waterbody (IE_EA_090_0100). The WFD status of North Bull Island transitional waterbody is *Moderate*. The WFD status of the Dublin Bay Coastal Waterbody is *Good* and the waterbody is *Not at Risk* of not meeting its WFD status objectives (EPA,2022).

3.3.2 Geology, Soils and Hydrogeology

The Site of the Proposed Development is situated on the Dublin groundwater body, which is *Not at Risk* of meeting its WFD status objectives. The GSI have classified the aquifer beneath the Site as *Locally Important (LI)*, *bedrock which is moderately productive in local zones only*. The groundwater rock units underlying the aquifer are classified as *Dinantian Upper Impure Limestones*. The level of vulnerability to groundwater contamination from human activities is *Low*. The quaternary sediments beneath the Site are *till derived from Limestones (TLs) a*nd the soil (Teagasc) is classed as *Made* (GSI, 2022).

3.3.3 Habitats

The dominant habitat on Site Buildings and Artificial Surfaces (BL3), with limited areas of Hedgerows (WL1), Treelines (WL2) and mosaics of recolonising bare ground (ED3) and dry meadows and grassy verges (GS2).

3.4 Identification of Relevant European Sites

To identify the European Sites that potentially lie within the Zone of Influence (ZOI) of the Proposed Development, a Source-Pathway-Receptor method (S-P-R) was adopted, as described in 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021), a practice note produced by the Office of the Planning Regulator. This note was published to provide guidance on screening for appropriate assessment (AA) during the planning process, and although it focuses on the approach a planning authority should take in screening for AA, the methodology is also readily applied in the preparation of Appropriate Assessment Screening Reports such as this.

The guidance document published by the Department of Housing, Planning and Local Government (then DEHLG) 'Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities' (2009) recommends an arbitrary distance of 15km as the precautionary ZOI for a plan or project being assessed for likely significant effects on European Sites, stating however that this should be evaluated on a case-by-case basis.

As such, the 15km ZOI is used in this report as an initial starting point for collating European Sites for AA screening.

The methodology used to identify relevant European Sites comprised the following:

- Use of current GIS spatial datasets for European Sites and water catchments – downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) to identify European Sites which could potentially be affected by the Proposed Development;
- The catchment data were used to establish or discount potential hydrological connectivity between the Project Boundary and any European Sites.
- All European Sites within the zone of influence (within 15km of the Proposed Development Site) were identified and are shown in Figure 4.
- The potential for connectivity with European Sites at distances greater than 15km from the Proposed Development was also considered in this initial assessment. In this case, there is no potential connectivity between the Proposed Development Site and European Sites located at a distance greater than 15km from the Proposed Development based on the S-P-R model.
- Table 1 provides details of all relevant European Sites as identified in the preceding steps. The potential for pathways between European Sites and the Proposed Development Site was assessed on a case-by-case basis using the Source-Pathway-Receptor framework as per the OPR Practice Note PN01 (March 2021). Those European Sites where a pathway has been identified are highlighted in green. Pathways considered included:
    a. Direct pathways (e.g., proximity (i.e., location within the European Site), water bodies, air (for both air emissions and noise impacts).
    b. Indirect pathways (e.g., disruption to migratory paths, 'Sightlines' where noisy or intrusive activities may result in disturbance to shy species.
- The site synopses and conservation objectives of these sites, as per the NPWS website (www.npws.ie), were consulted and reviewed at the time of preparing this report.
- There is absolutely no reliance placed in this Appropriate Assessment Screening Report on measures intended to avoid/reduce harmful effects on the European Sites.

The result of this preliminary screening concluded that there is a total of eight SACs and seven SPAs located within the 15km ZOI of the Proposed Development Site. The distances to each site listed are taken from the nearest possible point of the Proposed Development Site boundary to the nearest possible point of each European Site.

Potential impacts between the Proposed Development Site and four European Sites within the ZOI were identified. The European Sites linked to the Proposed Development include:

- North Dublin Bay SAC
- South Dublin Bay SAC
- North Bull Island SPA
- South Dublin Bay and River Tolka Estuary SPA

TABLE 1. EUROPEAN SITES WITHIN THE 15KM PRECAUTIONARY ZONE OF INFLUENCE OF THE PROPOSED DEVELOPMENT AND POTENTIAL PATHWAYS BETWEEN THEM. THOSE EUROPEAN SITES FOR WHICH A S-P-R LINK WAS IDENTIFIED ARE HIGHLIGHTED IN GREEN.

Site Name & Site Code	Qualifying Interests (*= priority habitats) / Special Conservation Interest Species	Distance to Site	Connections (Source- Pathway- Receptor)
Special Areas of Conservation (SAC)			
North Dublin Bay SAC (000206)	[1140] Tidal Mudflats and Sandflats [1210] Annual Vegetation of Drift Lines [1310] Salicornia Mud [1330] Atlantic Salt Meadows [1410] Mediterranean Salt Meadows [2110] Embryonic Shifting Dunes [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes)* [2190] Humid Dune Slacks [1395] Petalwort (*Petalophyllum ralfsii*)	5.8km	**Yes** – weak hydrological pathway via surface water discharges from the Site to the public surface water system during the Construction Phase and discharges from Ringsend WwTP into Dublin Bay during the Construction and Operational Phases. The distance of 5.8 km is sufficient to exclude significant effects arising from the following during the Construction and Operational Phase: • Emission of noise, dust and/or vibrations. • Increased traffic volumes. • Increased lighting emitted from the Site. • Increased human presence at the Site.
Baldoyle Bay SAC (000199)	[1140] Mudflats and sandflats not covered by seawater at low tide [1310] Salicornia and other annuals colonising mud and sand [1330] Atlantic salt meadows [1410] Mediterranean salt meadows	6.9km	**None –** There is no hydrological pathway to this SAC. In addition, the distance of 6.9 km is sufficient to exclude significant effects arising from the following during the Construction and Operational Phase: • Emission of noise, dust and/or vibrations. • Increased traffic volumes. • Increased lighting emitted from the Site. • Increased human presence at the Site.
South Dublin Bay SAC (001266)	[1140] Mudflats and sandflats not covered by seawater at low tide [1210] Annual vegetation of drift lines [1310] Salicornia and other annuals colonising mud and sand [2110] Embryonic shifting dunes	7 km	**Yes** – weak hydrological pathway via surface water discharges from the Site during the Construction Phase and discharges from Ringsend WwTP into Dublin Bay during the Construction and Operational Phases. The distance of 7 km is sufficient to exclude significant effects arising from the following during the Construction and Operational Phase: • Emission of noise, dust and/or vibrations.

Site Name & Site Code	Qualifying Interests (*= priority habitats) / Special Conservation Interest Species	Distance to Site	Connections (Source- Pathway- Receptor)
			• Increased traffic volumes. • Increased lighting emitted from the Site. • Increased human presence at the Site.
Malahide Estuary SAC (001232)	[1140] Mudflats and sandflats not covered by seawater at low tide [1310] Salicornia and other annuals colonising mud and sand [1330] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1410] Mediterranean salt meadows *Juncetalia maritime* [2120] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2130] Fixed coastal dunes with herbaceous vegetation (grey dunes)*	7.8 km	**None** – There is no hydrological pathway. In addition, the intervening distances between the Site and the SACs are sufficient to exclude the possibility of significant effects on the SACs arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase
Howth Head SAC (000202)	[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts [4030] European dry heaths	10.2 km	
Rockabill to Dalkey Island SAC (003000)	[1170] Reefs [1351] Harbour Porpoise (*Phocoena phocoena*)	10.9 km	
Ireland's Eye SAC (002193)	[1220] Perennial vegetation of stony banks [1230] Vegetated sea cliffs of the Atlantic and Baltic coasts	11.7 km	
Rogerstown Estuary SAC (000208)	[1130] Estuaries [1140] Mudflats and sandflats not covered by seawater at low tide [1310] Salicornia and other annuals colonising mud and sand [1330] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1410] Mediterranean salt meadows *Juncetalia maritime* [2120] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2130] Fixed coastal dunes with herbaceous vegetation (grey dunes)*	11.7 km	
Special Protected Area (SPA)			

Site Name & Site Code	Qualifying Interests (*= priority habitats) / Special Conservation Interest Species	Distance to Site	Connections (Source- Pathway- Receptor)
South Dublin Bay and River Tolka Estuary SPA (004024)	[A046] Light-bellied Brent Goose *Branta bernicla hrota* [A130] Oystercatcher *Haematopus ostralegus* [A137] Ringed Plover *Charadrius hiaticula* [A141] Grey Plover *Pluvialis squatarola* [A143] Knot *Calidris canutus* [A144] Sanderling *Calidris alba* [A149] Dunlin *Calidris alpina alpina* [A157] Bar-tailed Godwit *Limosa lapponica* [A162] Redshank *Tringa tetanus* [A179] Black-headed Gull *Chroicocephalus ridibundus* [A192] Roseate Tern *Sterna dougallii* [A193] Common Tern *Sterna hirundo* [A194] Arctic Tern *Sterna paradisaea* [A999] Wetlands	4.1 km	**Yes** – weak hydrological pathway via surface water discharges from the Site to the public surface water system during the Construction Phase and discharges from Ringsend WwTP into Dublin Bay. The dominant habitat at the Proposed Development is Buildings and Artificial Surfaces, as such the Site does not provide *ex-situ* habitat for the Special Conservation Interest (SCI) species of these SPAs.
North Bull Island SPA (004006)	[A046] Light-bellied Brent Goose *Branta bernicla hrota* ; [A048] Shelduck *Tadorna tadorna* [A052] Teal *Anas crecca* [A054] Pintail *Anas acuta* [A056] Shoveler *Anas clypeata* [A130] Oystercatcher *Haematopus ostralegus;* [A140] Golden Plover *Pluvialis apricaria* [A141] Grey Plover *Pluvialis squatarola* [A143] Knot *Calidris canutus* [A144] Sanderling *Calidris alba* [A149] Dunlin *Calidris alpina alpine* [A156] Black-tailed Godwit *Limosa limosa;* [A157] Bar-tailed Godwit *Limosa lapponica* [A160] Curlew *Numenius arquata* [A162] Redshank *Tringa tetanus* [A169] Turnstone *Arenaria interpres* [A179] Black-headed Gull *Chroicocephalus ridibundus* [A999] Wetlands	5.8 km	
Baldoyle Bay SPA (004016)	[A046] Light-bellied Brent Goose *Branta bernicla hrota* [A048] Shelduck *Tadorna tadorna* [A137] Ringed Plover *Charadrius hiaticula* [A140] Golden Plover *Pluvialis apricaria* [A141] Grey Plover *Pluvialis squatarola* [A157] Bar-tailed Godwit *Limosa lapponica* [A999] Wetlands	7.2 km	**None** – These SPAs are located at significant distances from the Proposed Development. There is no hydrological pathway. In addition, the intervening distances between the Site and the SPAs are sufficient to exclude the possibility of significant effects on the SPAs arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phase and associated emissions; potential increased lighting emitted from the Site during Construction and Operational Phase; and increased human presence at the Site during Construction and Operational Phase.
Malahide Estuary SPA (004025)	[A005] Great Crested Grebe *Podiceps cristatus* [A046] Brent Goose *Branta bernicla hrota* [A048] Shelduck *Tadorna tadorna* [A054] Pintail *Anas acuta* [A067] Goldeneye *Bucephala clangula* [A069] Red-breasted Merganser *Mergus serrator* [A130] Oystercatcher *Haematopus ostralegus* [A140] Golden Plover *Pluvialis apricaria* [A141] Grey Plover *Pluvialis squatarola* [A143] Knot *Calidris canutus* [A149] Dunlin *Calidris alpina alpina*	7.8km	

Site Name & Site Code	Qualifying Interests (*= priority habitats) / Special Conservation Interest Species	Distance to Site	Connections (Source- Pathway- Receptor)
	[A156] Black-tailed Godwit *Limosa limosa* [A157] Bar-tailed Godwit *Limosa lapponica* [A162] Redshank *Tringa totanus* [A999] Wetlands		The dominant habitat at the Proposed Development is Buildings and Artificial Surfaces, as such the Site does not provide *ex-situ* habitat for the Special Conservation Interest (SCI) species of these SPAs
Ireland's Eye SPA (004117)	[A017] Cormorant *Phalacrocorax carbo* [A184] Herring Gull *Larus argentatus* [A188] Kittiwake *Rissa tridactyla* [A199] Guillemot *Uria aalge* [A200] Razorbill *Alca torda*	11.5 km	
Rogerstown Estuary SPA (004015)	[A043] Greylag Goose Anser anser [A046] Light-bellied Brent Goose *Branta bernicla hrota* [A048] Shelduck *Tadorna tadorna* A056] Shoveler *Anas clypeata* [A130] Oystercatcher *Haematopus ostralegus* [A137] Ringed Plover *Charadrius hiaticula* [A141] Grey plover *Pluvialis squatarola* [A143] Knot *Calidris canutus* [A149] Dunlin *Calidris alpina* [A156] Black-tailed Godwit *Limosa limosa* [A162] Redshank *Tringa totanus* [A999] Wetland and Waterbirds	12.1 km	
Howth Head Coast SPA (004113)	[A188] Kittiwake *Rissa tridactyla*	12.6 km	

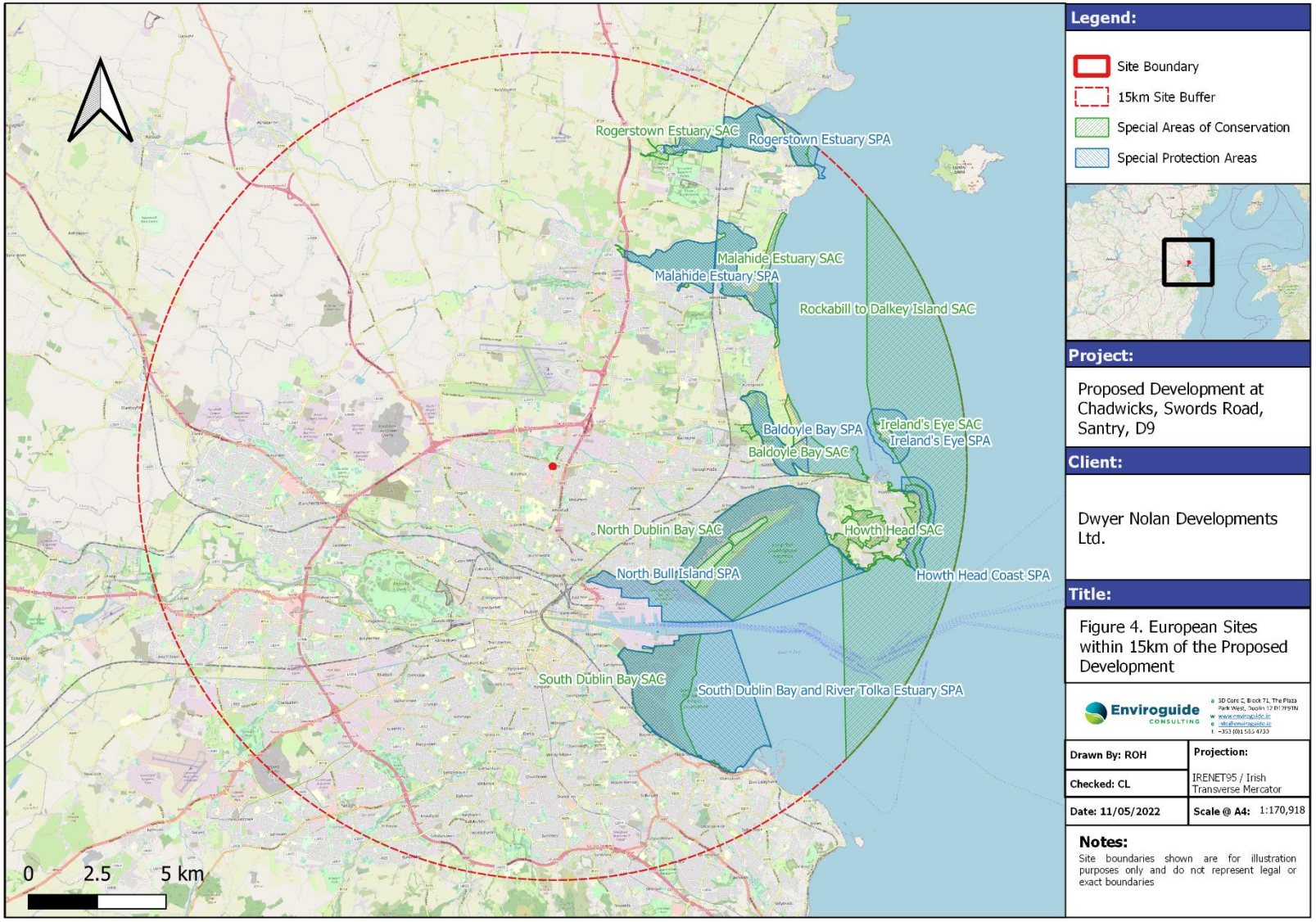

FIGURE 4. EUROPEAN SITES WITHIN 15KM OF THE PROPOSED DEVELOPMENT SITE.

3.5 Assessment of Likely Significant Effects

A European Site will only be at risk from likely significant effects where a Source-Pathway-Receptor link exists between the Proposed Development and the European Site. As such, the remainder of this AA Screening report will focus on the European Sites for which a S-P-R link was identified. Namely:

- North Dublin Bay SAC
- South Dublin Bay SAC
- North Bull Island SPA
- South Dublin Bay and River Tolka Estuary SPA

3.5.1 Conservation objectives

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them.

Site specific conservation objectives (SSCO) have been compiled for the European Sites listed above. Site-specific conservation objectives aim to define favourable conservation condition for habitats or species at a site.

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.

Favourable conservation status of a habitat is achieved when:

- its natural range, and area it covers within that range, are stable or increasing.
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future.
- the conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

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

3.5.2 Identification and Assessment of Likely Significant Effects

The conservation objectives of the European Sites within the zone of influence were reviewed and assessed to establish whether the construction and operation of the Proposed Development has the potential to have a negative impact on any of the qualifying interests and/or conservation objectives listed for the sites.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., “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".

The potential for significant effects resulting from the Proposed Development during the Construction and Operational Phases was determined based on a range of indicators, including:

- Habitat loss or alteration
- Habitat/species fragmentation
- Disturbance and/or displacement of species
- Changes in population density; and
- Changes in water quality and resource

The following elements of the Proposed Development were assessed for their potential for likely significant effects on European Sites.

- **Construction Phase** (estimated duration: 5 years)
  - Uncontrolled releases of silt, sediments and/or other pollutants to air due to earthworks.
  - Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies.
  - Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater.
  - Waste generation during the Construction Phase comprising soils, construction and demolition wastes.
  - Increased noise, dust and/or vibrations as a result of construction activity.
  - Increased dust and air emissions from construction traffic.
  - Increased lighting in the vicinity as a result of construction activity.

- **Operational Phase** (estimated duration: indefinite)
  - Surface water drainage from the Site of the Proposed Development.
  - Foul water from the Proposed Development leading to increased loading on wastewater treatment plants.
  - Increased lighting in the vicinity emitted from the Proposed Development; and
  - Increased human presence in the vicinity as a result of the Proposed Development.

3.5.3 Habitat Loss and Alteration

The project is not located within any European Site and therefore there will be no direct loss or alteration of habitat as a result of the Proposed Development.

3.5.4 Habitat / Species Fragmentation

As there will be no direct habitat loss within any European Sites, no habitat fragmentation will arise as a result of the Proposed Development.

3.5.5 Changes in Water Quality and Resource

Surface Water

The Site will be served by the public surface water sewer system. According to the Greater Dublin Strategic Drainage Study (2015), the Site is within the Santry River S1002 drainage

catchment and as such the surface water network ultimately discharges to the Santry River, which in turn discharge to North Dublin Bay.

The potential for surface water generated at the Site of the Proposed Development to reach the European Sites in Dublin Bay and cause significant effects, during both the Construction and Operational Phases, is negligible due to:

- The lack of any surface water bodies in the immediate vicinity of the Proposed Development Site.
- The distance and consequent potential for dilution in the Santry River and Dublin Bay. Surface water discharges would have to travel over 6 river km along the Santry River before discharging into Dublin Bay.
- The low volume of any surface water run-off relative to the volume of the receiving Santry River and Dublin Bay.
- The potential for mixing, dilution and dispersion of any surface water run-off/discharges in the surface water network and the Santry River prior to reaching Dublin Bay.

It is a policy of Dublin City Council (SI18) to "*require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works*". As such, the Proposed Development design entails a suite of SuDS measures that will be incorporated into the Proposed Development. This will reduce the flow rate of surface water run-off and largely eliminate the risk of pollution to waterbodies arising from surface water run-off during the Operational Phase of the Proposed Development (refer to section 0 for more details).

It remains to be seen as to whether SUDS are considered as mitigation when screening for Appropriate Assessment (See *Eoin Kelly v. An Bord Pleanála [2019] IEHC 84 ('Eoin Kelly')* and *People Over Wind and Sweetman v. Coillte Teoranta* (Case C-323/17) ('*People Over Wind*')), and this is yet to be unequivocally confirmed by case law. Therefore, for the purposes of this report, SUDS measures are **not being relied upon in any way** to mitigate against likely significant effects on European Sites.

Foul Water

The Site will be served by the public sewer, foul water from the Proposed Development will be treated at Ringsend WwTP prior to outfall to Dublin Bay. The potential for foul water generated at the Site of the Proposed Development to reach the European Sites within Dublin Bay and cause significant effects is negligible due to:

- The completion of the first phase of upgrade works to Ringsend WwTP, which increased the capacity of the facility by 400,000 P.E. in December 2021 and the further upgrade works proposed which will increase the capacity of the facility to 2.4 million P.E.
- It is considered that effects on marine biodiversity and the European Sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 3.5.10 for more details).

- The main area of dispersal of the treated effluent from Ringsend WwTP is in the Tolka Basin and around North Bull Island. South Dublin Bay is unaffected by the effluent form the plant (Irish Water, 2018).
- The potential maximum increased load as a result of the Proposed Development is not expected to present any source of significant impacts on the European Sites post treatment and discharge from the WwTP.

3.5.5.1 Construction Phase dewatering

Shallow groundwater may be encountered during the construction works of the basement excavation. Disposal of this water to sewer will require a consent/licence issued under Section 16 of the Local Government (Water Pollution) Acts and Regulations and must be obtained from Irish Water. Any such discharge licence is likely to be subject to conditions regarding the flow (rates of discharge, quantity etc.); effluent quality prior to discharge and pre-treatment (e.g., settlement/filtration, hydrocarbon separation etc.) and monitoring requirements. All dewatering will be undertaken in strict compliance with the conditions of the discharge licence for the project.

3.5.6 Disturbance and / or Displacement of Species

As outlined in section 3.5.5 above, the hydrological link between the Site and the European Sites within Dublin Bay will not result in significant effects on the water quality and resource indicator during both the Construction and Operational Phases. As such, QI/SCI species within the European Sites will not be affected by water quality impacts.

The Site of the Proposed Development does not provide any suitable *ex-situ* habitat for SCI species of any nearby SPAs.

3.5.7 Changes in Population Density

For the same reasons outlined in section 3.5.5 above, the Proposed Development does not have the capacity to cause any significant changes in the population density of any species within any European Site.

3.5.8 Potential for In-combination Effects

Existing Planning Permissions

There are several existing planning permissions on record in the area ranging from small-scale extensions and alterations to existing residential properties to some larger-scale developments. Larger-scale developments identified within the vicinity of the Proposed Development are as follows:

Ref F20A/0004. Lilmar Industrial Estate, Oak Avenue, Santry, Dublin 9. Planning permission was sought for the demolition of existing industrial units (2417 sq.m). Construction of 2 no. apartment blocks (3-5 storeys in height), comprising 35 no. units (13 no. 1-bed, 18 no. 2-bed and 4 no. 3-bed), all with balconies/terraces facing north-south-east/west. Development to be accessed from Oak Avenue (existing) to the south with additional new pedestrian access to the east. Provision of car parking (surface) and cycle parking, open spaces and all associated site development works, landscaping, boundary treatments and other servicing works. Decision: Grant Permission (20/04/2021).

Ref 4506/19. Beaumont Hospital, Beaumont Road, Dublin 9. The proposed development will consist of the construction of a three storey (approx. 6,657 sq. m) extension to the existing Phase 1 St. Luke/s Radiation Oncology Centre in line with the objectives of the National Plan for Radiation Oncology, the demolition of the Medical Records Building (approx. 313.6 sq. m), demolition of existing Phase 1 entrance lobby and part demolition of existing link corridor (approx. 171.5 sq. m), modifications to the existing Phase 1 building elevation, the provision of photovoltaic panels on the roof of the existing Phase 1 and proposed Phase 2 buildings, the relocation of a gas skid, alterations to the existing set down area/access road to the front entrance of the building, modifications to the north staff car park, the extension of the surface car park to the south of the campus to provide an increase of 222 no. parking spaces (of which 145 no. are relocated from the proposed Phase 2 site and the existing northern car park), 34 no. bicycle parking spaces, pedestrian and wayfinding provisions, all associated landscaping, site services and site development works. Decision: Grant Permission (17/04/2020).

EIA Portal ID: 2019211, ABP Ref: ABP- 306075. Off Northwood Avenue, Santry, Dublin 9. Construction of 4 no. 8-storey apartment blocks over a shared basement, providing a total of 331 no. apartment units, a multi-function area, gym, childcare facility, 5 no. ground floor mixed-use units, ancillary car/cycle parking and substation. Decision: Grant Permission (24/03/2020).

Ref 2737/19. Santry Avenue and Swords Road, Santry, Dublin 9. (Adjacent to the Proposed Development). Permission for development, consisting of modifications to a permitted mixed use development under Ref. 2713/17, located at Santry Avenue and Swords Road, Santry, Dublin 9. Permission is sought to increase the height of Blocks A, B and C from permitted 5 storeys to proposed 7 storeys and for a change in unit type and increase in number of apartments i.e. 70 no. apartments, which will result in a change from 137 no. permitted apartments to 207 no. 1, 2 & 3 bed apartments in the aforementioned buildings, including provision of balconies and roof terraces (i.e. 240sq.m. each) to Blocks A, B & C. The ground floor of Block C will accommodate a unit (i.e. 210sq.m.) for community use in compliance with condition no. 3 attached to planning permission Ref. 2713/17. The proposed development also seeks to provide additional office floor space to both Blocks D & E, providing an increase of 2,931sq.m. of office accommodation to the overall previously permitted development. Block D will increase in height from permitted 2 & 4 storeys to proposed 3 & 5 storeys, while Block E will increase in height from permitted 4 storeys to proposed 5 storeys. Permission is also sought for an extension to the permitted basement car park, (i.e. 1,273sq.m.), to accommodate 52 no. additional car parking spaces, additional bicycle parking and a new emergency escape route to the surface. The proposed development also provides for conversion of 3 no. surface car parking spaces to 3 no. "GoCar" spaces to the north of Block B, and all associated site development works, on a site area of 1.55ha. The effect of the proposed development will be a modification to an extant permission under Ref. 2713/17. Decision: Grant Permission (22/08/2019).

Ref 2713/17. Santry Avenue and Swords Road, Santry, Dublin 9. (Adjacent to the Proposed Development). The proposed development (c.25,083 sq.m m total gfa above basement car park, and excluding plant, bin stores and bike stores), generally comprises: the partial demolition (c.7,781 sq.m m gfa) of an existing 8-bay warehouse (c.9,539 sq.m m gfa), and the construction of: 1 no. 5-storey mixed use building fronting Swords Road (Block A: c.5,932 sq.m m gfa in total), including 3 no. retail/commercial units (c.502 sq.m m) at ground level and 48 no. residential units in levels above; 1 no. 5-storey residential building (Block B:

c.5,233 sq.m m gfa, 47 no. residential units); 1 no. 5-storey mixed use building (Block C:c.5,383 sq.m m gfa in total), including 2 no. office units (c.373 sq.m m gfa) and 1 no. crèche (c.331 sq.m m gfa) at ground floor, and 42 no. residential units from ground to 4th floor levels; the refurbishment of the partially retained and reclad double height warehouse (2-bays, 1,758 sq.m m gfa) with new 4-storey extension, to accommodate commercial office use (Block D: c.6,733 sq.m m gfa in total); and a new 4-storey commercial office building (Block E: c.1,802 sq.m m gfa in total); The proposed development accommodates 137 no. residential units in total (25 no. 3-bed, 88 no. 2-bed and 24 no. 1-bed); And all ancillary and associated site development works, including: new vehicular and pedestrian access via Swords Road at the north east corner of the site, and environmental improvements along the Swords Road frontage; upgrading of existing vehicular and pedestrian access via Santry Avenue; new basement car park (c.3,988 sq.m m) accessed via ramp under Block A accommodating 122 no. car parking spaces (to include 6 no. disabled access), 100 no. bicycle parking spaces, plant, etc.; 151 no. surface car parking spaces (to include 7 no. disabled access); 100 no. surface bicycle spaces; bin storage at ground level in Blocks B and C; surface water attenuation tank; and, hard and soft landscaping, lighting and boundary treatment works; all on a site of c. 1.9Ha. Decision: Grant Permission (28/03/2018).

3.5.9 Relevant Policies and Plans

The following policies and plans were reviewed and considered for possible in-combination effects with the Proposed Development.

- Dublin City Biodiversity Action Plan 2015 - 2020
- Dublin City Development Plan 2016-2022
- Dublin City Council Development Plan 2016-2022 Appropriate Assessment
- Draft Dublin City Development Plan 2022 – 2028

There is potential for proposed plans and projects within the Dublin City Development Plan 2016-2022 land area, to have cumulative, negative impacts on conditions in Dublin Bay via rivers, other surface water features and foul waters treated at Ringsend WwTP and discharged into Dublin Bay. However, the core strategy, policies and objectives of the Dublin City Development Plan have been developed to anticipate and avoid the need for developments that would be likely to significantly affect the integrity of any European site. Furthermore, such developments are required to conform to the relevant regulatory provisions for the prevention of pollution, nuisance or other environmental effects likely to significantly affect the integrity of Natura 2000 sites (Dublin City Development Plan 2016–2022: Appropriate Assessment). In addition, sustainable development including SuDS measures for all new developments is inherent in the objectives of all development plans within the Greater Dublin Area. Therefore, it is unlikely that cumulative impacts due to surface water discharges will exist during the Construction and Operational Phases of the Proposed Development.

Upon examination of the listed plans and projects, it is concluded that there is no possibility for any in-combination effects between these projects and plans and the Proposed Development.

3.5.10 Operations of Ringsend WwTP

In June 2018 Irish Water applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WwTP facility. The first phase of upgrade works to Ringsend WwTP was completed in December 2021, which increased the capacity of the plant by 400,000 P.E. These works, together with the future works permitted will ultimately increase the capacity of the facility from 1.6 million PE to 2.4 million PE. This plant upgrade will result in an overall reduction in the final effluent discharge of several parameters from the facility including BOD, suspended soils, ammonia, DIN and MRP. An Environmental Impact Assessment Report (EIAR) was submitted by Irish Water as part of this upgrade application. The EIAR contains sections relating to Marine Biodiversity and Terrestrial Biodiversity, and each contains a section on the 'do-nothing scenario'. These review the effects of the WwTP on biodiversity in Dublin Bay *in the absence of the upgrade works* and so are relevant to this report.

The EIAR report acknowledges that under the do-nothing scenario "*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*", which could result in a decline in biodiversity and the deterioration of the biological status of Dublin Bay (Irish Water, 2018). Nevertheless, these negative impacts of nutrient over-enrichment are considered "unlikely" (Irish Water, 2018). This is because historical data suggests that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna. The EIAR notes that "*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*." Indeed, the results of the marine macroinvertebrate studies undertaken for the EIAR show that "*the Inner Tolka Basin is host to macroinvertebrate communities as rich (if not richer) than those found in the north Dublin Bay and south Dublin Bay mudflats and sandflats*". Furthermore, the EIAR notes that significant impacts on waterbird populations foraging on invertebrates in Dublin Bay due to nutrient over-enrichment are "*unlikely*" to occur (Irish Water, 2018). What is important in the context of this AA screening report is that the do-nothing scenario predicts that nutrient and suspended solid loads from the WwTP will "*continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity*" and that "*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*."

Therefore, it can be concluded that significant effects on marine biodiversity and the European Sites within Dublin Bay from the *current* operation of Ringsend WwTP are unlikely. Importantly, this conclusion is not dependent upon any future works to be undertaken at Ringsend. Thus, in the absence of any upgrading works, significant effects to European Sites are not likely to arise.

On examination of the above it is considered that there are no means for the Proposed Development to act in-combination with the *current* operations at Ringsend WwTP, that would cause any likely significant effects on any European Sites.

TABLE 2. SUMMARY OF IMPACT ASSESSMENT ON EUROPEAN SITES AS A RESULT OF THE PROPOSED DEVELOPMENT.

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
South Dublin Bay SAC (000210)	No	No	No	None	None	None	NO
North Dublin Bay SAC (000206)	No	No	No	None	None	None	NO
SPA							
South Dublin Bay and River Tolka Estuary SPA (004024)	No	No	No	None	None	None	NO
North bull Island SPA (00406)	No	No	No	None	None	None	NO

4 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at the Chadwicks Site, Swords Road, Santry, Dublin 9 has been assessed taking into account:

- the nature, size and location of the proposed works and possible impacts arising from the construction works.
- the qualifying interests and conservation objectives of the European Sites
- the potential for in-combination effects arising from other plans and projects.

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that, on the basis of objective information; the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European Sites listed below, either alone or in-combination with other plans or projects:

- North Dublin Bay SAC (000206)
- Baldoyle Bay SAC (000199)
- South Dublin Bay SAC (000210)
- Malahide Estuary SAC (000205)
- Howth Head SAC (000202)
- Rockabill to Dalkey Island SAC (003000)
- Ireland's Eye SAC (002193)
- Rogerstown Estuary SAC (000208)
- South Dublin Bay and River Tolka Estuary SPA (004024)
- North Bull Island SPA (004006)
- Baldoyle Bay SPA (004016)
- Malahide Estuary SPA (004025)
- Ireland's Eye SPA (004117)
- Rogerstown Estuary SPA (004015)
- Howth Head Coast SPA (004113)

In carrying out this AA Screening, **mitigation measures have not been taken into account**. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

Further to the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself, or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.

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