SCREENING REPORT & NATURA IMPACT STATEMENT
INFORMATION FOR STAGE 1 SCREENING & STAGE 2 APPROPRIATE ASSESSMENT
PROPOSED STRATEGIC HOUSING DEVELOPMENT
ST. TERESA’S SHD, TEMPLE HILL, MONKSTOWN, BLACKROCK, CO. DUBLIN

Prepared for Oval Target Ltd.

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1 Introduction

This report, which contains information required for the competent authority (in this instance An Bord Pleanála) to undertake both Stage 1 Screening for Appropriate Assessment and Stage 2 Appropriate Assessment (AA) in respect of a proposed strategic housing development (herein referred to as “the proposed development”) at St. Teresa’s, Temple Hill, Monkstown, Blackrock, Co. Dublin (herein referred to as “the subject lands”), was prepared by Scott Cawley Ltd. on behalf of the applicant. The report provides information and appraises the potential for the proposed development to have significant effects, either individually or in combination with other plans or projects, on the integrity of any Natura 2000 sites (hereafter ‘European sites’). The information in this report forms part of, and should be read in conjunction with, the documentation accompanying the application for permission for the proposed development.

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter ‘the Habitats Directive’) requires that, any plan or project not directly connected with or necessary to the management of a European site, but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to AA of its implications for the site in view of the site’s conservation objectives. For the purposes of the application for permission in respect of the proposed industrial development, the requirements of Article 6(3) have been transposed into Irish law by Part XAB of the Planning and Development Act 2000, as inserted.

The possibility of there being a significant effect on a European site will generate the need for a Stage 2 AA to be carried out by the competent authority for the purposes of Article 6(3). Accordingly, a Stage 1 Screening for AA in respect of an application for consent for proposed development must be carried out by the competent authority (in this case, An Bord Pleanála) in order to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on any European site. A Stage 2 AA is required if it cannot be excluded, on the basis of objective information, that a proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site. The Screening stage operates merely to determine whether a full AA must be undertaken on the implications of the plan or project for the conservation objectives of relevant European sites.

This document comprises information to enable Fingal County Council to perform both Stage 1 screening for Appropriate Assessment and Stage 2 full Appropriate Assessment if required. The information in relation to the Stage 1 Screening Stage is presented in Section 4 of this document which comprises the

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1 Natura 2000 sites are defined under the Habitats Directive (Article 3) as a European ecological network of special areas of conservation composed of sites hosting the natural habitat types listed in Annex I and habitats of the species listed in Annex II. The aim of the network is to aid the long-term survival of Europe’s most valuable and threatened species and habitats. In Ireland these sites are designed as European sites – as defined under the Planning and Development Act s and/or Birds and Habitats Regulations as (a) a candidate site of Community importance, (b) a site of Community importance, (c) a candidate special area of conservation, (d) a special area of conservation, (e) a candidate special protection area, or (f) a special protection area. They are commonly referred to in Ireland as candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs).
Screening Report. Whereas, information to enable the Board to perform its statutory function to conduct a full Appropriate Assessment, if required, is presented in Sections 5, 6 and 7 (which sections comprise the NIS).

2 Methodology

2.1 Authors’ Qualifications & Expertise

This Natura Impact Statement (NIS) has been prepared jointly by Paul Scott and Colm Clarke of Scott Cawley.

Paul Scott is Director with Scott Cawley Ltd. He holds a first class honours degree in Environmental Biology from the University of Liverpool and a Masters in Pollution and Environmental Control at the University of Manchester. He is a Chartered Ecologist and Environmentalist and a Full Member of the Chartered Institute of Ecology and Environmental Management. He is an experienced environmental scientist, specialising in impact assessment and ecology. He has experience in a wide variety of environmental assessment and management projects and also has acted as a member of environmental assessment Expert Panels. Paul has prepared guidance on Strategic Environmental Assessment, Appropriate Assessment and Environmental Impact Assessment to UK and Irish central government and local authorities. Paul has prepared ecological guidance notes designed for planners and developers on behalf of the four Dublin local authorities. Paul has been involved in many Appropriate Assessments of complex projects and land-use plans including the Cherrywood SDZ, Meath and Clare County Development Plans, East Meath Local Area Plan and variations to the Meath, Navan, Kells, Galway, Dublin, Ennis and Kildare Development Plans. Paul developed a review package for Appropriate Assessment as part of the EPA STRIVE funded project Integrated Biodiversity Impact Assessment. He lectures on EIA and Appropriate Assessment practice at University College Dublin, Trinity College Dublin and NUI Galway. Mr Scott was responsible for checking and approval of this report and provided additional text where required.

Colm Clarke holds an honours degree in Natural Sciences and a Master’s degree in Biodiversity and Conservation, both awarded by Trinity College Dublin. He is an Associate member of the CIEEM, and has professional experience working in Australia and New Zealand, as well as more recent experience in Ireland and the UK. Prior to joining Scott Cawley, Colm was involved in the completion of Ecological Impact Assessments of numerous renewable energy and quarrying projects. Since joining Scott Cawley, Colm has been project manager on ecological assessments that include EIA, EcIA and AA. These have included complex projects such as bridge repair works in European Sites, linear infrastructure projects, and the assessment of large outdoor music events. Colm is involved in several ongoing ecological clerk of works roles where he is required to liaise with specialists from other disciplines. His area of expertise is botanical surveying; however, he has a wide range of ecological experience including bat surveys, protected mammal surveys and survey for crayfish.

2.2 Guidance

This Natura Impact Statement has been prepared having regard to the following guidance documents where relevant:
Proposed Strategic Housing Development

St. Teresa’s SHD, Temple Hill, Monkstown, Blackrock, Co. Dublin

Provision of Information for AA Screening and Natura Impact Statement

- **Proposed Strategic Housing Development**

- **Provision of Information for St. Teresa’s SHD, Temple Hill, Monkstown, Blackrock, Co. Dublin**

The information comprised in this report will assist the competent authority to conduct both the required Stage 1 Screening and Stage 2 Appropriate Assessments in respect of the proposed development and was based on a desk study undertaken on 12th July 2018 as well as multiple site visits undertaken between March and June 2018. Information relied upon included the following sources, which included maps, ecological and water quality data:

- Ordnance Survey Ireland mapping and aerial photography available from OSI online GeoHive mapping resource (Ordnance Survey Ireland, 2018);
- Data on protected species and European sites, available for download and interrogation from the National Parks and Wildlife Service maps and data page (National Parks & Wildlife Service, 2018);
- Spatial information relevant to the planning process including land zoning and planning applications from Department of Housing Planning, Community and Local Government web map portal (Department of Housing, Planning, Community and Local Government, 2018);
- Data on waterbodies, available for download and interrogation from the Environmental Protection Agency web map service (Environmental Protection Agency, 2018);
- Information on soils, geology and hydrogeology in the area available for download and interrogation from the Geological Survey Ireland online Spatial Resources service (Geological Survey Ireland, 2018);
- Information on surface/storm water and foul water discharges from the lands during construction and operation provided by JJ Campbell & Associates, consulting engineers for the proposed development;
- Information on brent geese and their distribution/use of inland feeding sites in the Dublin region from *Use of Inland Feeding Sites by Light-bellied Brent Geese in Dublin 2008-2009: A New Conservation Concern?* (Benson, 2009); and,
- Information on the status of EU protected habitats and species in Ireland (National Parks & Wildlife Service, 2013a & 2013b); and,

With regard to the assessment of other plans and projects with potential for cumulative effects, the lands are within the realm of the *Blackrock Local Area Plan* (Dún Laoghaire-Rathdown County Council, 2015) and the *Dún Laoghaire-Rathdown County Development Plan 2016-2022* (Dún Laoghaire-Rathdown County Council, 2016).

### 2.3 Stage 1 Screening Methodology

The above referenced guidance documents set out a staged process for carrying out the assessment required under the Habitats Directive, the first stage of which is referred to as screening. This screening stage identifies the likely significant impacts on a European site, if any, which would arise from a proposed development either alone or in combination with other plans and projects.

The possibility of there being a significant effect on a European site will generate the need for a Stage 2 AA to be carried out by the competent authority for the purposes of Article 6(3). In this instance, the competent authority is Fingal County Council. A screening for appropriate assessment of an application for consent for proposed development must be carried out by the competent authority to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on any European site. A Stage 2 Appropriate Assessment 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 first (Screening) stage for appropriate assessment operates merely to determine whether a (Stage 2) Appropriate Assessment must be undertaken on the implications of the plan or project for the conservation objectives of relevant European sites.

Screening for AA involves the following:

- Determining whether a project or plan is directly connected with or necessary to the conservation management of any European sites;
- Describing the details of the project/plan proposals and other plans or projects that may cumulatively affect any European sites;
- Describing the characteristics of relevant European sites; and
- Appraising likely significant effects of the proposed project on relevant European sites.

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2 In this instance the proposed development is not directly connected with or necessary to the conservation management of any European sites.
Section 4 of this report provides a summary of the information gathered for the AA screening and Sections 5, 6 and 7 of this report take forward the assessment into full AA.

2.4 Stage 2 AA Methodology

For Stage 2 AA, the potential for a proposed development, individually or in combination with other plans or projects, to adversely affect the integrity of European sites must be examined with respect to the specific conservation objectives of the relevant European sites. This Stage 2 AA also requires consideration of the specific mitigation measures that will be implemented to ensure an absence of adverse effects on the integrity of European sites. Stage 2 AA must provide a clear conclusion regarding the absence (considering the implementation of mitigation measures) of adverse effects on the integrity of European sites. In order to grant permission, the competent authority must conclude, having conducted the Stage 2 AA that the proposed development will not have an adverse effect on the integrity of any identified European sites.

For the avoidance of doubt, and as demonstrated by the conclusions of this report, it is not necessary in the case of this proposed development to progress to further stages of the assessment process i.e. the developer does not seek to rely upon the provisions of Article 6(4) of the Habitats Directive.

3 Overview of Proposed Development and its Receiving Environment

3.1 Location and Context of the Proposed Development to European Sites

Based on examination of the database of protected sites held by the NPWS, the subject lands do not overlap with and are not located directly adjacent to any European sites (NPWS, 2017). The lands are located off Temple Hill (N31) north of Rockfield Park and Dunardagh (St. Catherine’s) and south of Blackrock Village. The subject lands are centred on Irish Grid Reference O 21844 28949.

The lands comprise Craigmore House, and associated buildings including a former school and dormitory facility. Surrounding the buildings are the gardens associated with Craigmore House, which have reverted to semi-natural habitats in places. Habitats in the lands include those corresponding to the Fossitt (2000) categories ‘buildings and artificial surfaces’, ‘ornamental shrub and flower borders’, ‘amenity grassland’, ‘dry meadows and grassy verges’, ‘mixed broadleaved woodland’, ‘hedgerows’, and ‘treelines’. None of the habitats within the lands are qualifying interests for any European sites within the vicinity. During field survey visits of the subject lands in March 2018 no evidence of special conservation interest species for which European sites within the vicinity have been designated were recorded within the subject lands.

There are no surface water features within the subject lands, although the Carysfort-Maretimo Stream is located adjacent to the lands. Surface waters within the lands drain to the stream, at least in part, via cast-iron storm water drains with storm fittings south and north of Craigmore House, and with fittings along the avenue leading to Dunardagh. The storm water drains connect to a 400mm ductile iron pipe on Temple Hill which then discharge to the culverted section of the Carysfort Maretimo Stream (Irish Water, 2018). There are no operational water monitoring stations downstream of the subject lands, and no publicly available information available from the Environmental Protection Agency web database on water quality within the Carysfort-Maretimo stream (Environmental Protection Agency, 2018). In light
of its location within the Dublin area, and the high likelihood that numerous storm water pipes outfall to it, it is considered likely that the stream is subject to water quality pressures at present.

The closest European sites, South Dublin Bay SAC (000210) and South Dublin Bay and River Tolka Estuary SPA (004024), both c. 300m to the north and connected to the lands via the surface water network, have been designated for a range of coastal and marine habitats and species. Some overwintering bird species, for which are special conservation interests of several European sites in Dublin Bay (e.g. light-bellied brent goose Branta bernicla hrota, oystercatcher Haematopus ostralegus, plover species) are known to visit amenity and agricultural grassland sites outside of the SPA boundary in the Dublin region for supplementary forage (NPWS, 2012; Benson, 2009). None of these species was noted within the subject lands. Although the adjacent lands at Rockfield Park were identified as being suitable as inland feeding sites for brent geese in a study to inform a Natura Impact Statement for a strategic housing development at lands east of St. Paul’s College, Sybil Hill Road, Raheny, Dublin 5 (Scott Cawley, 2017), no signs of brent geese (either observations or droppings or feathers) were gathered during the same study in winter 2016/2017. Likewise, no signs of overwintering birds was noted at Rockfield Park in March 2018 during surveys for the proposed development. The subject lands contain rank grassland which is considered to be suboptimal for grazing waterfowl.

3.2 Description of the Proposed Development

Full details of the proposed development are outlined within the planning application for the proposed development. In brief, the proposed development is for the construction of a housing development of 294 units within the subject lands, including construction of roads, services, landscaping and all ancillary facilities.

Run-off from the proposed development during operation will be at a rate of 12.4l/s (JJ Campbell Consulting Engineers, 2018) as surface waters will be attenuated on site prior to release.

The project will result in an increase in foul water loading to a population equivalent (P.E.) of 771 during operation of the proposed development. Foul waters will be collected and directed to the existing 1200mm combined sewer on Temple Hill, which directs waters to Dún Laoghaire pumping station, which pumps waters to Ringsend Wastewater Treatment Plan (WWTP) for treatment.

4 Provision of Information for Screening

4.1 Potential Impacts Arising from the Proposed Development and Pathways to European Sites

In light of the description of the development provided within Section 3.2 and the location of the subject lands in relation to European sites as outlined in Section 3.1, potential impacts arising from the proposed development relate to potential impacts on water quality in the receiving environment arising from:

- Pollution and/or sediment-laden run-off from the lands reaching European sites in Dublin Bay during the construction phase of the proposed development; and,
- Increased foul water loading affecting the quality of foul water discharge from the local waste water facility (in this instance the Ringsend WWTP).

The pathways between the lands and European sites in this instance are the surface/storm water network which connects the lands to Dublin Bay via the Carysfort-Maretimo Stream, and the foul water network which connects the lands to Dublin Bay via the Ringsend WWTP.

Proposed Strategic Housing Development
St. Teresa’s SHD, Temple Hill,
Monkstown, Blackrock, Co. Dublin

Provision of Information for
AA Screening and Natura Impact Statement
4.2 Zone of Influence of the Proposed Development

There is no set recommended distance from a proposed development for which European sites are considered as being relevant for AA. Available guidance (NPWS, 2010) recommends that ‘the distance should be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects’.

For significant effects to arise, there must be a potential impact enabled by having a ‘source’ (e.g. construction works at a proposed development site), a ‘receptor’ (e.g. a European site or its qualifying interests), and a pathway between the source and the receptor (e.g. a watercourse connecting a proposed development site to a European site). The identification of a pathway does not automatically mean that significant effects will arise, however, the absence of a pathway means that a significant effect is not possible. The likelihood for significant effects will depend upon the characteristics of the source (e.g. nature of construction works), the characteristics of the pathway (e.g. nature of the watercourse receiving run-off from construction) and the characteristics of the receptor (e.g. the sensitivities of the European site and its qualifying interests or special conservation interests).

In this instance the zone of influence of the proposed development is considered to extend to European sites within Dublin Bay, to which surface waters and foul waters from the proposed development will drain. There are eight European sites within Dublin Bay comprising four Special Areas of Conservation (SACs) and four Special Protection Areas (SPAs) within Dublin Bay, which are as follows:

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006)
- South Dublin Bay SAC (000210)
- South Dublin Bay and River Tolka Estuary SPA (004024)
- Howth Head SAC (000202)
- Howth Head Coast SPA (004113)
- Rockabill to Dalkey Island SAC (003000)
- Dalkey Islands SPA (004172)

It is often considered appropriate to examine all European sites within the vicinity as a starting point. In this instance, no European sites outside of Dublin Bay are considered to be within the zone of influence of the proposed development. European sites within the vicinity of the proposed development have been analysed with regards to the potential for significant effect in Table 1, overleaf.
Table 1: Analysis of European sites within the vicinity of the proposed development

<table>
<thead>
<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests(^3)(^4)</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
</thead>
</table>
| **South Dublin Bay SAC (000210)**  | c. 300m north               | \(\text{Conservation Objectives: South Dublin Bay SAC 000210. Version 1. (NPWS, 2013c).}\)  
[1140] Mudflats and sandflats not covered by seawater at low tide  
[1210] Annual vegetation of drift lines  
[1310] \(\text{Salicornia}\) and other annuals colonising mud and sand  
[2110] Embryonic shifting dunes | The possibility of significant effects cannot be ruled out in the absence of mitigation.  
The lands are connected to the European site via the foul water and surface water networks: Foul waters are discharged following treatment at Ringsend wastewater treatment plant (WWTP) to Dublin Bay at Poolbeg; Surface waters from the lands discharge to the receiving surface water network which outfalls via the Carysfort-Maretimo Stream to Dublin Bay at Blackrock, c. 300m from the lands.  
\textit{Discharge of foul effluent from the proposed development.}\)  
The proposed development will be fully serviced with foul sewers which will have adequate capacity. Discharge will be licenced by Irish Water and the sewage will be transferred to Irish Water’s Ringsend WWTP which is required to be operated under an EPA licence and to meet environmental legislative requirements. Enriched water entering Dublin Bay has been shown to rapidly mix and become diluted within a short distance of the outfall. This has been shown in model predictions undertaken in 2005 (O’Higgins and Wilson, 2005), as part of an EIA in 2012 and in the recent EIAR | Yes |

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\(^3\) “Qualifying Interests” for SACs and “Special Conservation Interests” for SPAs based on relevant Statutory Instruments for each SPA, and NPWS Conservation Objectives for SACs downloaded from www.npws.ie in July 2015.

\(^4\) Sourced from NPWS online Conservation Objectives Generic Version 5.0 for SACs and 5.0 for SPAs, unless otherwise stated.
<table>
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<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
</thead>
</table>
| Rockabill to Dalkey Island SAC (003000) | c. 5.4km east               | Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1 (NPWS, 2013d)  
[1170] Reefs  
Discharge of surface waters during construction of the proposed development  
In the absence of any mitigation, there is a possibility that pollution-laden surface waters could reach Dublin Bay, particularly during a storm event. As the European site is located at the outfall point for surface waters from the proposed development, and is located only 300m away, the possibility of pollutants affecting qualifying interests where they occur at the outfall point cannot be ruled out. | No.  
Although there is a hydrological connection between the project and European sites in the Irish sea via the surface and foul water networks, the distance between the outfalls for surface and foul waters is such that any potential pollutants will be absorbed and diluted to an extent that they will not be discernible. | No |
| North Dublin Bay SAC (000206)         | c. 5.4km north              | Conservation Objectives: North Dublin Bay SAC 000206. Version 1 (NPWS, 2013e).  
[1140] Mudflats and sandflats not covered by seawater at low tide  
[1210] Annual vegetation of drift lines | No.  
Although the lands are connected to the European site via the foul water and surface water networks, which discharge to the Liffey Estuary at Poolbeg and Dublin Bay at Blackrock, respectively, there is no possibility of significant effects for the following reasons:  
Discharge of foul effluent from the proposed development. | No |
### Proposed Strategic Housing Development

#### Provision of Information for

**St. Teresa’s SHD**, Temple Hill, Monkstown, Blackrock, Co. Dublin

#### Site name and code | Distance from subject lands | Qualifying Interests/Special Conservation Interests | Possibility of Significant Effects on European site? | Further Assessment Required
--- | --- | --- | --- | ---
Howth Head SAC (000202) | c. 9.2km northeast | **Conservation Objectives:** Howth Head SAC 000202. Version 1. (NPWS, 2016).  
[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts | No. | No

- The proposed development will be fully serviced with foul sewers which will have adequate capacity. Discharge will be licenced by Irish Water and the sewage will be transferred to Irish Water’s Ringsend WWTP which is required to be operated under an EPA licence and to meet environmental legislative requirements. Enriched water entering Dublin Bay has been shown to rapidly mix and become diluted within a short distance of the outfall. This has been shown in model predictions undertaken in 2005 (O’Higgins and Wilson, 2005), as part of an EIA in 2012 and in the recent EIAR (Irish Water, 2018) submitted by Irish Water regarding Ringsend WWTP planning upgrades.

**Discharge of surface waters during construction of the proposed development**

In the absence of any mitigation, there is a possibility that pollution-laden surface waters could reach Dublin Bay, particularly during a storm event. Nonetheless, the European site is separated from the outfall point at Blackrock by c. 5.2km of marine waters. This is a large distance over which it is anticipated that any pollutants will be absorbed and diluted to an extent that they will not be measurable at the European site. Therefore there is no possibility of significant effects arising from surface water discharges.

- [1310] *Salicornia* and other annuals colonising mud and sand
- [1330] Atlantic salt meadows (*Glaucopuccinellietalia maritimae*)
- [1395] Petalwort *Petalophyllum ralfsii*
- [1410] Mediterranean salt meadows (*Juncetalia maritimi*)
- [2110] Embryonic shifting dunes
- [2120] Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)
- [2130] Fixed coastal dunes with herbaceous vegetation (grey dunes)
- [2190] Humid dune slacks
<table>
<thead>
<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests3 4</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Knocksink Wood SAC (000725)</td>
<td>c. 9.6km south</td>
<td>[4030] European dry heaths</td>
<td>habitats occur above the high-water mark and are not at risk from changes to water quality in Dublin Bay.</td>
<td>No</td>
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</tbody>
</table>
| Wicklow Mountains SAC (002122) | c. 9.7km south | **Conservation Objectives: Wicklow Mountains SAC 002122. Version 1 (NPWS, 2017).**  
[1355] Otter Lutra lutra  
[3110] Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)  
[3130] Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetalia  
[3160] Natural dystrophic lakes and ponds  
[4010] Northern Atlantic wet heaths with Erica tetralix  
[4030] European dry heaths  
[4060] Alpine and Boreal heaths  
[6130] Calaminarian grasslands of the Violetalia calaminariae | No.  
There is no source-receptor-pathway linking the proposed development to the European site. The subject lands are downgradient of the European site, and are located in a separate sub basin. | No |
<table>
<thead>
<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
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<tr>
<td>Ballyman Glen SAC (000713)</td>
<td>c. 9.8km south</td>
<td>[6230] Species-rich <em>Nardus</em> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [7130] Blanket bogs (* if active bog) [8110] Siliceous scree of the montane to snow levels (<em>Androsaceta I alpinae</em> and <em>Galeopsietalia ladani</em>) [8210] Calcareous rocky slopes with chasmophytic vegetation [8220] Siliceous rocky slopes with chasmophytic vegetation [91A0] Old sessile oak woods with <em>Ilex</em> and <em>Blechnum</em> in the British Isles</td>
<td>No. There is no source-receptor-pathway linking the proposed development to the European site. The subject lands are downgradient of the European site, and are located in a separate sub basin.</td>
<td>No</td>
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<td>Baldoyle Bay SAC (000199)</td>
<td>c. 11km north</td>
<td>[1140] Mudflats and sandflats not covered by seawater at low tide [1310] <em>Salicornia</em> and other annuals colonizing mud and sand [1330] Atlantic salt meadows (<em>Glauco-Puccinellietalia maritimae</em>)</td>
<td>No. Although there is a hydrological connection between the project and European sites in the Irish sea via the surface and foul water networks, the distance between the outfalls for surface and foul waters is such that any potential pollutants will be absorbed and diluted to an extent that they will not be discernible.</td>
<td>No</td>
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<td>Site name and code</td>
<td>Distance from subject lands</td>
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<tr>
<td>Bray Head SAC (000714)</td>
<td>c. 12.4km south</td>
<td>[1410] Mediterranean salt meadows (<em>Juncetalia maritimii</em>)</td>
<td>No. There is no potential for the proposed development to affect dry heath or sea cliff habitat on Bray Head given the distance and absence of any potential impact pathways to affect terrestrial habitats in the SAC: Both habitats occur above the high-water mark and are not at risk from changes to water quality in Dublin Bay.</td>
<td>No</td>
</tr>
</tbody>
</table>
| Ireland’s Eye SAC (002193) | c. 13.5km north | *Conservation Objectives: Ireland’s Eye SAC 002193. Version 1. (NPWS, 2017).*  
[1220] Perennial vegetation of stony banks  
[1230] Vegetated sea cliffs of the Atlantic and Baltic coasts | No. There is no potential for the proposed development to affect terrestrial habitat above the normal high-tide mark on Ireland’s Eye given the distance and absence of any potential impact pathways to affect terrestrial habitats in the SAC: Both habitats occur above the high-water mark and are not at risk from changes to water quality in Dublin Bay. | No |
| Glenasmole Valley SAC (001209) | c. 13.5km west | [6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (*important orchid sites*)  
[6410] *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)  
[7220] Petrifying springs with tufa formation (**Cratoneurion**) | No. There is no source-receptor-pathway linking the proposed development to the European site. The subject lands are downgradient of the European site, and are located in a separate sub basin. | No |

Special Protection Areas
<table>
<thead>
<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
</thead>
</table>
| South Dublin Bay and River Tolka Estuary SPA (004024) | c. 300m north | **Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1 (NPWS, 2015).**  
[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*  
[A157] Bar-tailed Godwit *Limosa lapponica*  
[A162] Redshank *Tringa totanus*  
[A179] Black-headed Gull *Creicocephalus ridibundus*  
[A192] Roseate Tern *Sterna dougallii*  
[A193] Common Tern *Sterna hirundo*  
[A194] Arctic Tern *Sterna paradisaea*  
[A999] Wetland and Waterbirds | The possibility of significant effects cannot be ruled out in the absence of mitigation.  
The lands are connected to the European site via the foul water and surface water networks: Foul waters are discharged following treatment at Ringsend wastewater treatment plant (WWTP) to Dublin Bay at Poolbeg; Surface waters from the lands discharge to the receiving surface water network which outfalls via the Carysfort-Maretimo Stream to Dublin Bay at Blackrock, c. 300m from the lands.  
**Discharge of foul effluent from the proposed development.**  
The proposed development will be fully serviced with foul sewers which will have adequate capacity. Discharge will be licenced by Irish Water and the sewage will be transferred to Irish Water’s Ringsend WWTP which is required to be operated under an EPA licence and to meet environmental legislative requirements. Enriched water entering Dublin Bay has been shown to rapidly mix and become diluted within a short distance of the outfall. This has been shown in model predictions undertaken in 2005 (O’Higgins and Wilson, 2005), as part of an EIA in 2012 and in the recent EIAR (Irish Water, 2018) submitted by Irish Water regarding Ringsend WWTP planning upgrades.  
**Discharge of surface waters during construction of the proposed development.**  
In the absence of any mitigation, there is a possibility that contaminated surface waters could reach Dublin Bay, particularly during a storm event. As the European site is located at the outfall. | Yes |
<table>
<thead>
<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests$^3$</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
</thead>
</table>
| North Bull Island SPA (004006) | c. 5.4km north | *Conservation Objectives: North Bull Island SPA 004006. Version 1 (NPWS, 2015).*  
[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  
[A156] Black-tailed Godwit Limosa limosa  
Although the lands are connected to the European site via the foul water and surface water networks, which discharge to the Liffey Estuary at Poolbeg and Dublin Bay at Blackrock, respectively, there is no possibility of significant effects for the following reasons:  
**Discharge of foul effluent from the proposed development.**  
The proposed development will be fully serviced with foul sewers which will have adequate capacity. Discharge will be licenced by Irish Water and the sewage will be transferred to Irish Water’s Ringsend WWTP which is required to be operated under an EPA licence and to meet environmental legislative requirements. Enriched water entering Dublin Bay has been shown to rapidly mix and become diluted within a short distance of the outfall. This has been shown in model predictions undertaken in 2005 (O’Higgins and Wilson, 2005), as part of an EIA in 2012 and in the recent EIAR (Irish Water, 2018) submitted by Irish Water regarding Ringsend WWTP planning upgrades. | No |
## Proposed Strategic Housing Development

### Provision of Information for St. Teresa’s SHD, Temple Hill, Monkstown, Blackrock, Co. Dublin

<table>
<thead>
<tr>
<th>Site name and code</th>
<th>Distance from subject lands</th>
<th>Qualifying Interests/Special Conservation Interests(^3) (^4)</th>
<th>Possibility of Significant Effects on European site?</th>
<th>Further Assessment Required</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>[A160] Curlew <em>Numenius arquata</em></td>
<td><strong>Discharge of surface waters during construction of the proposed development</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A162] Redshank <em>Tringa totanus</em></td>
<td>In the absence of any mitigation, there is a possibility that pollution-laden surface waters could reach Dublin Bay, particularly during a storm event. Nonetheless, the European site is separated from the outfall point at Blackrock by c. 5.2km of marine waters. This is a large distance over which it is anticipated that any pollutants will be absorbed and diluted to an extent that they will not be measurable at the European site. Therefore there is no possibility of significant effects arising from surface water discharges.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A169] Turnstone <em>Arenaria interpres</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A179] Black-headed Gull <em>Croicocephalus ridibundus</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A999] Wetlands &amp; Waterbirds</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dalkey Island SPA (004172)</td>
<td>c. 5.5km southeast</td>
<td>[A192] Roseate Tern <em>Sternula dougallii</em></td>
<td>No.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A193] Common Tern <em>Sternula hirundo</em></td>
<td>There is no source-receptor-pathway link between the proposed development and the European site. The European site has been designated due to its importance as a nesting and staging post for tern species (NPWS, 2017). There is no possibility for the proposed development to affect the suitability of the island for staging or nesting birds.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A194] Arctic Tern <em>Sternula paradisaea</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wicklow Mountains SPA (004040)</td>
<td>c. 9.9km south</td>
<td>[A098] Merlin <em>Falco columbarius</em></td>
<td>No.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>[A103] Peregrine <em>Falco peregrinus</em></td>
<td>There is no source-receptor-pathway link between the proposed development and the European site. The European site has been designated for its breeding population of merlin and peregrine, neither of which were noted within the subject lands during surveys in 2018.</td>
<td></td>
</tr>
<tr>
<td>Site name and code</td>
<td>Distance from subject lands</td>
<td>Qualifying Interests/Special Conservation Interests[^3]</td>
<td>Possibility of Significant Effects on European site?</td>
<td>Further Assessment Required</td>
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<tr>
<td>Howth Head Coast SPA (004113)</td>
<td>c. 10.7km northeast</td>
<td>[A188] Kittiwake <em>Rissa tridactyla</em></td>
<td>No. There is no source-receptor-pathway link between the proposed development and the European site. The European site has been designated for its breeding population of kittiwake, which does not occur within the subject lands.</td>
<td>No</td>
</tr>
<tr>
<td>Baldoyle Bay SPA (004016)</td>
<td>c. 11km north</td>
<td>[A046] Brent Goose <em>Branta bernicla hrota</em> [A048] Shelduck <em>Tadorna tadorna</em> [A137] Ringed Plover <em>Charadrius hiaticula</em> [A140] Golden Plover <em>Pluvialis apricaria</em> [A141] Grey Plover <em>Pluvialis squatarola</em> [A157] Bar-tailed Godwit <em>Limosa lapponica</em> [A999] Wetlands</td>
<td>No. Although there is a hydrological connection between the project and European sites in the Irish sea via the surface and foul water networks, the distance between the outfalls for surface and foul waters is such that any potential pollutants will be absorbed and diluted to an extent that they will not be discernible. The proposed development site provides no supporting or <em>ex-situ</em> role for special conservation interest species of this European site.</td>
<td>No</td>
</tr>
<tr>
<td>Ireland’s Eye SPA (004117)</td>
<td>c. 13km north</td>
<td>[A017] Cormorant <em>Phalacrocorax carbo</em> [A184] Herring Gull <em>Larus argentatus</em> [A188] Kittiwake <em>Rissa tridactyla</em> [A199] Guillemot <em>Uria aalge</em> [A200] Razorbill <em>Alca torda</em></td>
<td>No. Although there is a hydrological connection between the project and European sites in the Irish sea via the surface and foul water networks, the distance between the outfalls for surface and foul waters is such that any potential pollutants will be absorbed and diluted to an extent that they will not be discernible. The proposed development site provides no supporting or <em>ex-situ</em> role for special conservation interest species of this European site.</td>
<td>No</td>
</tr>
</tbody>
</table>
Figure 1: European sites within the vicinity of the proposed development.
4.3 Conclusions on Information Provided for Screening Assessment

Information to enable An Bord Pleanála to perform its statutory function to carry out a screening for AA has been presented within this section of the report.

Following an examination, analysis and evaluation of the relevant information including, in particular, the nature of the proposed development and the likelihood of significant effects on any European site, and applying the precautionary principle, it is the professional opinion of the authors 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:

- North Dublin Bay SAC (000206)
- North Bull Island SPA (004006)
- Howth Head SAC (000202)
- Howth Head Coast SPA (004113)
- Rockabill to Dalkey Island SAC (003000)
- Dalkey Islands SPA (004172)

However, following an examination, analysis and evaluation of the relevant information including, in particular, the nature of the proposed development and the likelihood of significant effects on European sites, and again applying the precautionary principle, it is the professional opinion of the authors that it is not possible to exclude, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will have a likely significant effect on the following four European sites:

- South Dublin Bay SAC (000210)
- South Dublin Bay and River Tolka Estuary SPA (004024)

In the case of the two European sites listed above for which the possibility of significant effects cannot be excluded, the only likely significant risks to those European sites (in the absence of mitigation) arises from potential construction-related discharges to surface waters from the proposed development and the potential for these effects to reach downstream European sites. It was concluded, therefore, that likely significant effects on these two European sites may require mitigation in order to avoid adverse impacts on the integrity of the European Sites concerned. Therefore, this application has been accompanied by a Natura Impact Statement on the basis that the competent authority may wish to carry out a Stage 2: full Appropriate Assessment.

However, the authors of this report acknowledge it is for An Bord Pleanála, as competent authority, to carry out a screening for appropriate assessment and to reach one of the following determinations:

(a) Stage 2 AA of the 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;

(b) Stage 2 AA of the proposed development is not required if it can 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.
5 Provision of Information for Appropriate Assessment

The potential for significant effects arising from the proposed development on the integrity of South Dublin Bay SAC (000210) and South Dublin Bay and River Tolka Estuary SPA (004024) in light of their conservation objectives, is examined in this section.

5.1 Summary of European Sites Relevant to the Stage 2 Appropriate Assessment

5.1.1 South Dublin Bay SAC (000210)
Condition of site and management
The Natura 2000 Standard Data Form (NPWS, 2017a) lists South Dublin Bay SAC (000210) as a fine example of extensive intertidal flats, of predominantly sand with muddy sands in more sheltered areas. It also hosts the largest stand of eelgrass Zostera on the east coast. It provides a supporting role to important populations of wintering bird populations of Dublin Bay. Threats to the site include land reclamation, oil pollution from Dublin Port, commercial bait digging and disturbance walkers and dogs.

5.1.2 South Dublin Bay and River Tolka Estuary SPA (004024)
Condition of site and management
The Natura Standard Data Form (NPWS, 2017b) states that the South Dublin Bay and River Tolka Estuary SPA (004024) possesses extensive intertidal flats, part of which are designated as South Dublin Bay SAC (000210), and which supports wintering waterfowl as part of the wider Dublin Bay population. The site also supports an internationally important population of light-bellied brent geese Branta bernicla hrota, feeding on the stands of eelgrass Zostera as noted under South Dublin Bay SAC in Section 5.1.1 above. It hosts nationally important numbers of six species, is an important site for wintering gulls and is an autumn roosting site for a significant number of terns. The main threat to the site is land reclamation, with other threats including oil pollution from Dublin Port, commercial bait digging and disturbance by walkers and dogs.

5.1.3 Qualifying Interests potentially exposed to risk
All of the intertidal and estuarine habitats within South Dublin Bay SAC (000210) would be potentially at risk from contaminated water discharges or an accidental pollution incident during construction works associated with the proposed development, if they were of a sufficient magnitude and duration to affect water quality in Dublin Bay. The qualifying interests potentially exposed to risk are as follows:

- [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

The remaining qualifying interest, [2110] embryonic shifting dunes, is not considered to be potentially exposed to risk in light of their location above the normal high-tide mark, and therefore unlikely to be affected by a pollution event.

The wintering bird species for which South Dublin Bay and River Tolka Estuary SPA (004024) has been designated utilise the intertidal and estuarine habitats of South Dublin Bay SAC (000210) for feeding and
roosting. Although it is unclear whether there is a relationship between water quality pressures in Dublin Bay and populations of wintering birds within, the possibility cannot be ruled out in its entirety. Therefore, they could potentially be vulnerable to the potential effects of contaminated surface water discharges or an accidental pollution incident during construction works associated with the proposed development, if they were of a sufficient magnitude and duration to affect water quality in Dublin Bay, and affect feeding resources for birds.

5.2 Conservation Objectives

The Habitats Directive and Part XAB of the Planning and Development Act 2000 requires the focus of the AA at this second stage to be on the integrity of European sites “in light of their conservation objectives.” Site specific conservation objectives (SSCOs) for the qualifying interests of South Dublin Bay SAC (000210) and the special conservation interests of South Dublin Bay and River Tolka Estuary SPA (004024) considered potentially exposed to risk from the proposed development are summarised in Table 2, overleaf. The attributes and targets for the conservation objective are included and the potential for significant effects on these attributes and targets is considered within Table 2.
Table 2: Site specific conservation objectives, attributes and targets, and potential effects arising from the proposed development. Attributes and targets potentially at risk from the proposed development are highlighted in grey.

<table>
<thead>
<tr>
<th>Attribute / Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Dublin Bay SAC (000210)</td>
</tr>
<tr>
<td>[1140] Mudflats and sandflats not covered by seawater at low tide – Maintain the favourable conservation condition</td>
</tr>
<tr>
<td>Habitat area</td>
</tr>
<tr>
<td>Community extent</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Habitat area was estimated using OSI data as 720ha</td>
<td>The proposed development will not contribute to any changes to habitat area which would potentially result in adverse effects to this attribute. This is because there is no overlap between the subject lands and the habitat in question.</td>
</tr>
<tr>
<td>Based on an intertidal survey undertaken in 2011 (MERC, 2012). See marine supporting document for further information</td>
<td>The Zostera dominated community is located in the vicinity of Merrion Gates, c.2.7km northeast of the discharge point for the Carysfort-Maretimo Stream to Dublin Bay. While there is potential for a pollution event to affect Zostera communities if such an event was of sufficient magnitude to affect water quality in the Merrion Gates area, this is considered to be very unlikely due to the following:</td>
</tr>
<tr>
<td>- The site existing site layout includes relatively few surface/storm water sewer inlets, which drain hard standing areas only;</td>
<td></td>
</tr>
<tr>
<td>- The boundary walls around the lands provide a buffering mechanism which prevents runoff from the lands being...</td>
<td></td>
</tr>
<tr>
<td>Attribute</td>
<td>Measure</td>
</tr>
<tr>
<td>-----------------------------------</td>
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</tr>
<tr>
<td>Community structure: Zostera</td>
<td></td>
</tr>
<tr>
<td>density</td>
<td>Shoots/m²</td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Proposed Strategic Housing Development  
St. Teresa’s SHD, Temple Hill, Monkstown, Blackrock, Co. Dublin

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Effects Arising from Proposal to affect <em>Zostera</em> communities if such an event was of sufficient magnitude to affect water quality in the Merrion Gates area, this is considered to be very unlikely due to the following:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• The site existing site layout includes relatively few surface/storm water sewer inlets, which drain hard standing areas only;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• The boundary walls around the lands provide a buffering mechanism which prevents runoff from the lands being directed to storm water inlets on Temple Hill;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• There is a large distance of separation between the outfall of the Carysfort-Maretimo Stream in Blackrock, and mapped beds of eelgrass <em>Zostera</em> spp. at Merrion Gates, a distance over which it is anticipated that pollutants would likely be dispersed and absorbed, depending on tidal regime and volume of pollutants entering Dublin Bay.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>• There are numerous storm water outfalls to Dublin Bay, which are likely actively contributing to water quality pressures in the bay, particularly following storm events. Despite this, the water quality</td>
<td></td>
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</tr>
</tbody>
</table>
In light of the precautionary principle, it is considered appropriate to provide mitigation to ensure against the possibility of significant adverse effects on this attribute and target, albeit acknowledging that adverse effects are highly unlikely. While significant adverse effects are considered highly unlikely, it is considered appropriate to provide mitigation to ensure against the possibility of significant adverse effects on this attribute and target.

Although the habitat [1310] is included as a qualifying interest of South Dublin Bay SAC, the Site-specific Conservation Objectives document does not contain attributes and targets for this habitat's conservation. In this instance, equivalent measures have been sourced from site species conservation measures for Malahide Estuary SAC (000205).
<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Habitat distribution</td>
<td>Occurrence</td>
<td>No decline, or change in habitat distribution, subject to natural processes.</td>
<td>in the lee of an embryonic sand dune formation north of Booterstown Railway Station.</td>
<td>The habitat is not considered to be sensitive to pollution arising from the proposed development.</td>
</tr>
<tr>
<td>Physical structure: sediment supply</td>
<td>Presence/ absence of physical barriers</td>
<td>Maintain, or where necessary restore, natural circulation of sediments and organic matter, without any physical obstructions</td>
<td>No negative impacts are anticipated, as per reasons outlined above.</td>
<td>No negative impacts are anticipated, as per reasons outlined above.</td>
</tr>
<tr>
<td>Physical structure: creeks and pans</td>
<td>Occurrence</td>
<td>Maintain creek and pan structure, subject to natural processes, including erosion and succession</td>
<td>There is no possibility of significant impacts as the proposed development does not include the installation of physical barriers to sediment movement within Dublin Bay.</td>
<td>There is no possibility of significant impacts as the proposed development does not include the installation of physical barriers to sediment movement within the estuary.</td>
</tr>
<tr>
<td>Physical structure: flooding regime</td>
<td>Hectares flooded; frequency</td>
<td>Maintain natural tidal regime</td>
<td>There is no possibility of significant impacts as the proposed development does not include the alteration of physical structures within the estuary which could influence tidal regimes.</td>
<td>There is no possibility of significant impacts as the proposed development does not include the alteration of physical structures within the Bay which could influence habitat zonation.</td>
</tr>
<tr>
<td>Vegetation structure: zonation</td>
<td>Occurrence</td>
<td>Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession</td>
<td>There is no possibility of significant impacts as the proposed development does not include the alteration of physical structures within the Bay which could influence habitat zonation.</td>
<td>There is no possibility of significant impacts as the proposed development does not include the alteration of physical structures within the Bay which could influence habitat zonation.</td>
</tr>
<tr>
<td>Vegetation structure: vegetation height</td>
<td>Centimetres</td>
<td>Maintain structural variation within sward</td>
<td>There is no possibility of significant impacts as per reasons outlined above.</td>
<td>There is no possibility of significant impacts as per reasons outlined above.</td>
</tr>
<tr>
<td>Vegetation structure: vegetation cover</td>
<td>Percentage cover at a representative sample of</td>
<td>Maintain more than 90% of area outside creeks vegetated</td>
<td>There is no possibility of significant impacts as per reasons outlined under habitat area.</td>
<td>There is no possibility of significant impacts as per reasons outlined under habitat area.</td>
</tr>
<tr>
<td>Attribute</td>
<td>Measure</td>
<td>Target</td>
<td>Notes</td>
<td>Potential Effects Arising from Proposal</td>
</tr>
<tr>
<td>-----------</td>
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<td>----------------------------------------</td>
</tr>
<tr>
<td>Vegetation composition: typical species and subcommunities</td>
<td>Percentage cover</td>
<td>Maintain the presence of species-poor communities listed in SMP (McCorry and Ryle, 2009)</td>
<td></td>
<td>There is no possibility of significant impacts as per reasons outlined under habitat area.</td>
</tr>
<tr>
<td>Vegetation structure: negative indicator species - <em>Spartina anglica</em></td>
<td>Hectares</td>
<td>No significant expansion of common cordgrass (<em>Spartina anglica</em>). No new sites for this species and an annual spread of less than 1% where it is already known to occur</td>
<td></td>
<td>The proposed development does not include any works within Dublin Bay and there is therefore no possibility of facilitating the spread of <em>Spartina anglica</em>.</td>
</tr>
<tr>
<td>[1210] Annual vegetation of drift lines – maintain the favourable conservation condition⁶</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Habitat area</td>
<td>Hectares</td>
<td>Area stable or increasing, subject to natural processes including erosion and succession.</td>
<td>There are no publicly available maps of this habitat available through the NPWS website for the South Dublin Bay SAC (000210). Nonetheless, the Site Synopsis for South Dublin Bay SAC refers this habitat as in association with embryonic dunes at Poolbeg, Irishtown and Merrion/Booterstown.</td>
<td>No negative impacts are anticipated in light of the distance of separation (c. 2km) between the outfall of surface waters from the Carysfort-Maretimo Stream and the location of the habitat at Booterstown/Merrion. The habitat is not considered to be sensitive to pollution arising from the proposed development.</td>
</tr>
<tr>
<td>Habitat distribution</td>
<td>Occurrence</td>
<td>No decline or change in habitat distribution, subject to natural processes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

⁶ Although the habitat [1210] is included as a qualifying interest of South Dublin Bay SAC, the Site-specific Conservation Objectives document does not contain attributes and targets for this habitats conservation. In this instance, an equivalent measures have been sourced from site species conservation measures for Akeragh, Banna and Barrow Harbour SAC (000332)
<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical structure: functionality and sediment supply</td>
<td>Presence/absence of physical barriers</td>
<td>Maintain the natural circulation of sediment and organic matter, without any physical obstructions</td>
<td>There is no possibility of significant impacts as the proposed development does not include the installation of physical barriers to sediment movement within Dublin Bay.</td>
<td></td>
</tr>
<tr>
<td>Vegetation structure: occurrence</td>
<td>Occurrence</td>
<td>Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession</td>
<td>There is no possibility of significant impacts as the proposed development does not include the alteration of physical structures within the Bay which could influence habitat zonation.</td>
<td></td>
</tr>
<tr>
<td>Vegetation composition: typical species and subcommunities</td>
<td>Percentage cover at a representative number of monitoring stops</td>
<td>Maintain the presence of species-poor communities with typical species sea rocket (<em>Cakile maritima</em>), sea sandwort (<em>Honckenya peploides</em>), prickly saltwort (<em>Salsola kali</em>) and oraches (<em>Atriplex spp.</em>)</td>
<td>There is no possibility of significant impacts as per reasons outlined under habitat area.</td>
<td></td>
</tr>
<tr>
<td>Vegetation composition: negative indicator species</td>
<td>Percentage cover</td>
<td>Negative indicator species (including non-native species) to represent less than 5% cover</td>
<td>There is no possibility of significant effects arising from the proposed development as it does not include works within the estuary area.</td>
<td></td>
</tr>
<tr>
<td>Vegetation structure: vegetation height</td>
<td>Centimetres</td>
<td>Maintain structural variation in the sward</td>
<td>Based on data from McCorry (2007). Livestock grazing is absent from Malahide Estuary. See coastal habitats supporting document for further details</td>
<td>No negative impacts are anticipated, as per reasons outlined above.</td>
</tr>
<tr>
<td>Vegetation structure: vegetation cover</td>
<td>Percentage cover at a representative sample of outside creeks vegetated</td>
<td>Maintain more than 90% of area outside creeks vegetated</td>
<td>See coastal habitats supporting document for further details</td>
<td>No negative impacts are anticipated, as per reasons outlined above.</td>
</tr>
</tbody>
</table>
### Attribute

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vegetation composition: typical species and</td>
<td>Monitoring stops</td>
<td>Maintain range of subcommunities with characteristic species listed in SMP (McCorry and Ryle, 2009)</td>
<td>See coastal habitats supporting document for further details</td>
<td>No negative impacts are anticipated, as per reasons outlined above.</td>
</tr>
<tr>
<td>subcommunities</td>
<td></td>
<td></td>
<td></td>
<td>--------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Vegetation structure: negative indicator</td>
<td>Percentage cover at a representative sample of</td>
<td>Maintain range of subcommunities with characteristic species listed in SMP (McCorry and Ryle, 2009)</td>
<td>See coastal habitats supporting document for further details</td>
<td>There is no possibility of significant effects arising from the proposed development as it does not include works within the estuary area, which could potentially facilitate the accidental spread of <em>Spartina anglica</em></td>
</tr>
<tr>
<td>species - <em>Spartina anglica</em></td>
<td>monitoring stops</td>
<td></td>
<td></td>
<td>--------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Vegetation structure: negative indicator species</td>
<td>Hectares</td>
<td>No significant expansion of common cordgrass (<em>Spartina anglica</em>), with an annual spread of less than 1% where it is already known to occur</td>
<td>Based on data from McCorry (2007). <em>Spartina</em> is widely distributed throughout the SAC. See coastal habitats supporting document for further details. See coastal habitats supporting document for further details.</td>
<td>There is no possibility of significant effects arising from the proposed development as it does not include works within the estuary area, which could potentially facilitate the accidental spread of <em>Spartina anglica</em></td>
</tr>
</tbody>
</table>

**Malahide Estuary SPA (004025)**

Maintain the favourable conservation condition of the following species:

- [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*
- [A157] Bar-tailed Godwit *Limosa lapponica*
- [A162] Redshank *Tringa totanus*
- [A179] Black-headed Gull *Creicocephalus ridibundus*
<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
</table>
| Population trend        | Percentage change  | Long term population trend stable or increasing | Long-term population trends by species (from part 4 of NPWS (2014)):   | The proposed development does not have the potential to significantly impact the long-term population trend of any of the special conservation interest species. This is because:  
• Although there is potential for construction-related pollutants and sediments to be mobilised to the European site, this will be limited to storm events during the construction phase of the proposed development. The area of potential influence is likely to be confined to the area of the Carysfort-Maretimo Stream outfall at Blackrock. Any potential effects would likely be of short-duration and there is no evidence of a Negative relationship between overwintering bird populations in Dublin Bay and pollution events within the Bay. |
|                         |                    |                                           | [A046] Light-bellied Brent Goose *Branta bernicla hrota* Favourable 166% over 14-year period. |                                        |
|                         |                    |                                           | [A130] Oystercatcher *Haematopus ostralegus* Favourable 78% over 14-year period |                                        |
|                         |                    |                                           | [A137] Ringed Plover *Charadrius hiaticula* Favourable 14% over 14-year period |                                        |
|                         |                    |                                           | [A141] Grey Plover *Pluvialis squatarola* Unfavourable 44% over 14-year period |                                        |
|                         |                    |                                           | [A143] Knot *Calidris canutus* Favourable 82% over 14-year period |                                        |

7 Long-term population trend referenced relates to a 14-year period between 1995/96 and 2009/10 for bird populations in South Dublin Bay and River Tolka Estuary SPA (004024) as per NPWS (2014)
<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distribution</td>
<td>Range, timing and intensity of use of areas</td>
<td>No significant decrease in the range, timing or intensity of use of</td>
<td>Waterbird distribution from the 2011/2012 are summarised as follows based on NPWS (2014):</td>
<td>In the absence of any mitigation, there is some potential for a pollution event to affect the distribution of species in the vicinity of the Carysfort-Maretimo, if the pollution event were of sufficient magnitude to affect invertebrate species or Zostera beds of intertidal sands, which are food sources for several of the special conservation interest species for which the European site has been designated. This is considered to be unlikely for the following reasons:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>areas by the special conservation interest species, other than that</td>
<td>[A046] Light-bellied Brent Goose <em>Branta bernicla hrota</em>. Foraging was concentrated at low tide on mudflats and</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>occurring from natural patterns of variation</td>
<td>sandflats adjacent to the Poolbeg Peninsula.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>[A130] Oystercatcher <em>Haematopus ostralegus</em>. Foraging distribution over entire intertidal range within SPA.</td>
<td></td>
</tr>
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<td></td>
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</tbody>
</table>

### [A144] Sanderling *Calidris alba* **Favourable** increase of 45% over 14-year period

### [A149] Dunlin *Calidris alpina* **Favourable** increase of 20% over 14-year period

### [A157] Bar-tailed Godwit *Limosa lapponica* **Favourable** increase of 27% over 14-year period

### [A162] Redshank *Tringa totanus* **Favourable** increase of 84% over 14-year period

### [A179] Black-headed Gull *C. ridibundus* **Unfavourable** decrease of 33% over 14-year period
<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>[A137] Ringed Plover <em>Charadrius hiaticula</em>. Foraging is concentrated in intertidal areas adjacent to the Poolbeg Penninsula.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>[A149] Dunlin <em>Calidris alpina</em>. Foraging throughout intertidal zone within SPA.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- The site existing site layout includes relatively few surface/storm water sewer inlets, which drain hard standing areas only;
- The boundary walls around the lands provide a buffering mechanism which prevents runoff from the lands being directed to storm water inlets on Temple Hill;
- In the case of *Zostera* beds, there is a large distance of separation between the outfall of the Carysfort-Maretimo Stream in Blackrock, and mapped beds of eelgrass *Zostera* spp. at Merrion Gates, a distance over which it is anticipated that pollutants would likely be dispersed and absorbed, depending on tidal regime and volume of pollutants entering Dublin Bay I;
- There are numerous storm water outfalls to Dublin Bay, which are likely actively contributing to water quality pressures in the bay, particularly following storm events. Despite this, the water quality status of the Bay remains ‘Unpolluted’ (EPA, 2018).

While significant adverse effects are considered highly unlikely, it is considered...
### Attribute | Measure | Target | Notes | Potential Effects Arising from Proposal
--- | --- | --- | --- | ---
[A179] Black-headed Gull *Croicocephalus ridibundus*. Foraging throughout intertidal zone within SPA. |  |  | appropriate to provide mitigation to ensure against the possibility of significant adverse effects on this attribute and target.

**To maintain the favourable conservation condition of the following species:**

[A192] Roseate Tern *Sterna dougallii*

[A193] Common Tern *Sterna hirundo*

[A194] Arctic Tern *Stern paradisaea*

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breeding population abundance: apparently occupied nests (AONs)</td>
<td>Number</td>
<td>No significant decline</td>
<td>Measure based on standard tern survey methods (see Walsh <em>et al.</em>, 1995). For more information on the history and recent population estimates of the tern colony at this SPA see Newton <em>et al.</em> (2014)</td>
<td>There is no possibility of significant adverse effects. This is because there is no overlap between the subject lands and nesting/foraging sites for tern species.</td>
</tr>
<tr>
<td>Productivity rate: fledged young per breeding pair</td>
<td>Mean number</td>
<td>No significant decline</td>
<td>Passage population: individuals</td>
<td>There is no possibility of significant adverse effects. This is because there is no overlap between the subject lands and nesting/foraging sites for tern species.</td>
</tr>
<tr>
<td>Passage population: individuals</td>
<td>Number</td>
<td>No significant decline</td>
<td>Evening surveys of roosting terns in South Dublin Bay and River Tolka Estuary SPA confirm the conservation importance of the south Dublin Bay area during the post-breeding/pre-migration period. Up to 11,700, 9,025 and 8,020 terns were recorded in 2006, 2007 and 2010 respectively. Given the counting conditions (i.e. low light levels and long distance recording), it was rarely possible to identify terns to species level but the majority of the birds appear to have been</td>
<td>There is no possibility of significant adverse effects. This is because there is no overlap between the subject lands and nesting/foraging sites for tern species.</td>
</tr>
</tbody>
</table>
## Proposed Strategic Housing Development

### Provision of Information for St. Teresa’s SHD, Temple Hill, Monkstown, Blackrock, Co. Dublin

#### AA Screening and Natura Impact Statement

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Distribution:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>breeding colonies</td>
<td>Number; location; area (Hectares)</td>
<td>No significant decline</td>
<td>The common tern breeding colony in Dublin Bay is primarily sited on an artificial structure known as the ‘ESB Dolphin’ (see Newton <em>et al.</em>, 2014)</td>
<td>There is no possibility of significant adverse effects. This is because there is no overlap between the subject lands and nesting/foraging sites for tern species.</td>
</tr>
<tr>
<td><strong>Distribution: roosting areas</strong></td>
<td>Number; location; area (Hectares)</td>
<td>No significant decline</td>
<td>Merne <em>et al.</em> (2008) describe the main roosting area as the exposed sand banks in south Dublin Bay, primarily between the Martello Towers of at Sandymount (319524, 232021) and Williamstown (320796, 229979). Terns have been occasionally recorded outside of this area on adjacent sandflats extending to Irishtown/South Bull Wall and to Blackrock but these birds eventually joined the birds roosting in the main area (Merne <em>et al</em> 2008)</td>
<td>There is no possibility of significant adverse effects. The proposed development does not have the potential to affect the distribution of suitable roosting sites in Dublin Bay as it does not involve removal or alteration of sediments in the Bay.</td>
</tr>
<tr>
<td>Prey biomass available</td>
<td>Kilogrammes</td>
<td>No significant decline</td>
<td>During the breeding season, common terns can make extensive use of marine waters adjacent to their breeding colonies. Key prey items: Small fish, crustaceans, insects and</td>
<td>While a pollution event could affect tern prey at a local level, <em>i.e.</em> adjacent to the surface/storm water outfall of the Carysfort-Maretimo Stream in Blackrock, there is not</td>
</tr>
<tr>
<td>Attribute</td>
<td>Measure</td>
<td>Target</td>
<td>Notes</td>
<td>Potential Effects Arising from Proposal</td>
</tr>
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<td>-------------------------------</td>
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<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Barriers to connectivity</td>
<td>Number; location; shape; area (hectares)</td>
<td>No significant increase</td>
<td>During the breeding season, common terns can make extensive use of marine waters adjacent to their breeding colonies. Foraging range: max. 37km; mean max. 33.81km; mean 8.67km (Birdlife International, 2014). Terns associated with the roost are thought to feed during the day in the wider Dublin Bay area but direct survey evidence is incomplete. Evening observations of arriving terns to the primary roosting area indicated that most flew into Dublin Bay from an easterly and southeasterly direction leading the authors to suggest they were feeding in the shallow waters of the Kish/Bray and Burford Banks (Merne et al., 2008). Foraging ranges between post-breeding roost sites and feeding areas may be greater than the estimates given for the breeding season.</td>
<td>The proposed development does not include any construction within tern breeding or roosting habitat, and therefore there is no likelihood of significant adverse effects.</td>
</tr>
</tbody>
</table>

During the breeding season, common terns can make extensive use of marine waters adjacent to their breeding colonies. Foraging range: max. 37km; mean max. 33.81km; mean 8.67km (Birdlife International, 2014). Terns associated with the roost are thought to feed during the day in the wider Dublin Bay area but direct survey evidence is incomplete. Evening observations of arriving terns to the primary roosting area indicated that most flew into Dublin Bay from an easterly and southeasterly direction leading the authors to suggest they were feeding in the shallow waters of the Kish/Bray and Burford Banks (Merne et al., 2008). Foraging ranges between post-breeding roost sites and feeding areas may be greater than the estimates given for the breeding season. It is considered to be potential for significant adverse effects.

Multiple storm drains outfall to Dublin Bay, and it is likely that these deposit pollutants from roadways and other urban features to the Bay. Nonetheless, Dublin Bay’s coastal waters are classified as ‘Unpolluted’ by the EPA (EPA, 2018). In light of existing background pollution sources, the unpolluted water quality status of Dublin Bay, and the scale of the proposed development, there is not considered to be any likely significant adverse effects on prey biomass available for tern species.
<table>
<thead>
<tr>
<th>Attribute</th>
<th>Measure</th>
<th>Target</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disturbance at breeding site</td>
<td>Level of impact</td>
<td>Human activities should occur at levels that do not adversely affect the breeding common tern population</td>
<td>The common tern breeding colony in Dublin Bay is primarily sited on an artificial structure known as the ‘ESB Dolphin’ (see Newton et al., 2014)</td>
<td>The proposed development does not include any works within or adjacent to tern breeding or roosting habitat, and therefore there is no likelihood of significant adverse effects.</td>
</tr>
<tr>
<td>Disturbance at roosting site</td>
<td>Level of impact</td>
<td>Human activities should occur at levels that do not adversely affect the numbers of common tern among the post-breeding aggregation of terns</td>
<td>Merne et al (2008) describes the main roosting area as the exposed sand banks in south Dublin Bay primarily between the Martello Towers at Sandymount (319524, 232021) and Williamstown (320796, 229979). Although principally used as a night roost, birds begin to roost at least one hour before sunset during the period July - September with peak activity occurring between mid-August and mid-September (Merne et al 2008; Merne 2010). Merne (2010) recorded significant disturbance events to the roosting terns caused by people with dogs off the leash and kite surfing</td>
<td>The proposed development does not include any works within or adjacent to tern breeding or roosting habitat, and therefore there is no likelihood of significant adverse effects.</td>
</tr>
</tbody>
</table>

**[A999] Wetlands – maintain the favourable conservation condition**

<table>
<thead>
<tr>
<th>Habitat area</th>
<th>Hectares</th>
<th>Notes</th>
<th>Potential Effects Arising from Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>The permanent area occupied by the wetland habitat should be</td>
<td>The wetland habitat area was estimated as 2,192ha using OSi data and relevant</td>
<td>The proposed development does not have the potential to result in the loss of any wetland</td>
<td></td>
</tr>
<tr>
<td>Attribute</td>
<td>Measure</td>
<td>Target</td>
<td>Notes</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>stable and not significantly less than the area of 2,192 hectares, other than that occurring from natural patterns of variation. See map 3</td>
<td>orthophotographs. For further information see part three of the conservation objectives supporting document</td>
</tr>
</tbody>
</table>
6 Appraisal of Potential Impacts on European sites

6.1 Accidental pollution incident during construction

The only potential adverse effects on the integrity of the two relevant European sites arises from potential construction-related surface water discharges from the proposed development and the potential for these effects to reach downstream European sites. As outlined in Table 2, the qualifying interests/special conservation interests potentially exposed to risk are:

- [1140] Mudflats and sandflats not covered by seawater at low tide
- [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*
- [A157] Bar-tailed Godwit *Limosa lapponica*
- [A162] Redshank *Tringa totanus*
- [A179] Black-headed Gull *Chroicocephalus ridibundus*

There is no potential for adverse effects on any other qualifying interests of the South Dublin Bay SAC (000210) or special conservation interests of the South Dublin Bay and River Tolka Estuary SPA (004024) in light of their conservation objectives.

As outlined in Section 4 of this report all other potential impacts on the two relevant European sites may be excluded.

In the absence of mitigation, accidental spillages of oils, cement or other potential pollutants, during construction works could potentially be released into the surface/storm water drainage network and ultimately to Dublin Bay via the Carysfort-Maretimio Stream.

The following attributes [1140] Mudflats and sandflats not covered by seawater at low tide would be at risk in this scenario:

- **Community Extent**: There is some, albeit very low, potential for a pollution event to affect the extent of *Zostera* community at Merrion Gates, depending on the magnitude of the event and the tidal regime.

- **Community structure: Zostera density**: There is some, albeit very low, potential for a pollution event to affect *Zostera* density, if it were of sufficient magnitude to cause die-back of stems and leaves of the species at Merrion Gates.

- **Community Distribution**: There is some potential for a pollution even to affect the distribution of *Angulus tenuis* community in South Dublin Bay SAC (000210), if it were of sufficient magnitude to result in mortality of the species.


- **Distribution**: There is some potential for a pollution event to affect the distribution of several of the aforementioned special conservation interest species if a pollution event was of a sufficient magnitude to result in a die-off of Angulus tenuis community or to affect density of Zostera beds within Dublin Bay.

### 6.2 Mitigation Measures to Ensure an Absence of Adverse Effects on the Integrity of European Sites

A construction management plan has been prepared for the proposed development and includes measures for the protection of water courses during construction (JJ Campbell and Associates, 2018). The CMP includes a commitment for the installation of silt control measures, such as a barrier device on storm inlets within and adjacent to the lands. There is also a commitment to refuel construction vehicles and store hazardous materials in a designated location within the lands, which will be located remotely from storm water inlets. Hazardous materials will be stored within a bunded area to collect any accidental leaks/spills, and pollution kits will be maintained on site by the contractor throughout construction.

It is the professional opinion of the authors and design team that the mitigation measures outlined above, when implemented, will ensure that no adverse effects on European sites will arise from the construction or operational stages of the proposed development.
6.3 Potential Effects of the Project In-combination with other Plans and Projects

There will be no adverse effects on the integrity of European sites arising from the proposed development in combination with other plans or projects. This conclusion is based on the authors’ examination, analysis and evaluation of the factors set out below.

Several intertidal habitats for which the South Dublin SAC (000205) is designated are failing to meet favourable conservation status. For some of these, water pollution is considered a threat ranked as being of “high importance” (NPWS, 2013a).

The subject lands are located within the boundaries of the Blackrock Local Area Plan, and within the boundaries of Dún Laoghaire-Rathdown County Council. Lands at St. Teresa’s and Dunardagh (St. Catherine’s), the former of which encompasses the subject lands, form an area earmarked as ‘potential development areas’ within the Blackrock Local Area Plan (Dún Laoghaire-Rathdown County Council, 2015). Apart from a few smaller landholdings including ‘Deepwell’ on Rock Hill, the mews at ‘I’drone Terrace’, and ‘Lois an Uisce’ on the Rock Road, the vast majority of the Blackrock area is built up with a mix of residential, commercial and amenity developments. Most planning applications in the locality comprise small scale extensions to existing residential units. Several larger scale developments are at an advanced stage of construction, including:

- **D17A/0137 - Site of 0.49ha (1.23 acres) at Newtown Avenue, Blackrock, Co. Dublin** known as the ‘Former Europa Garage site. Permission was granted to Crekav Trading GP Ltd. by Dún Laoghaire-Rathdown County Council for the demolition of the former garage and construction of 51 no. residential units. At the time of writing, demolition of the garage was at an advanced stage;

- **D16A/0418 and D18A/0211 - Enterprise House, Blackrock Shopping Centre, Blackrock, Co Dublin.** Permission was granted to Friends First Life Assurance Co DAC for the demolition and rebuild of Enterprise House, off the Frascati Road. Permission was also granted for minor modifications to the proposal. Demolition of Enterprise House has been completed, and construction has begun on the new buildings within the lands;

- **D14A/0134; D15A/0751; D16A/0843; D17A/0950; and, D18A/0130 - Frascati Shopping Centre, Frascati Road (N31), Blackrock, Co Dublin.** Permission was granted by Dún Laoghaire-Rathdown County Council for the expansion/rejuvenation of Frascati Shopping Centre, including the construction of a multi-storey carpark, additional retail units, and apartment units. This development is at an advanced stage, with the car park constructed.

It is acknowledged that ongoing developments and those granted permission over the lifetime of construction of the project could, in the absence of mitigation, contribute to water quality pressures in Dublin Bay in-combination with the proposed development. However, the detailed and specific mitigation measures set out in Section 6.2 of this report fully address the potential impacts arising from the proposed development such that it will not give rise to significant impacts either alone or in combination with other potential impact sources.
7 Conclusions on the Stage 2 Appropriate Assessment Process

In order for AA to comply with the requirements of Article 6(3) the Habitats Directive and Part XAB of the Planning and Development Act 2000, a Stage 2 AA undertaken by the competent authority must include an examination, analysis, evaluation, findings, conclusions and a final determination. The information in this report will, along with all other submissions and observations received, enable An Bord Pleanála to perform its statutory function in this regard is presented within this NIS.

Following an examination, analysis and evaluation of the relevant information including, in particular, the nature of the proposed development and the relationship between the proposed development site and the relevant European sites and, applying the precautionary principle, it is the professional opinion of the authors of this report that there will be no adverse impact on the integrity of any European sites.

In the case of the two relevant European (those within the zone of influence and connected by a source-receptor-pathway link), the only potentially significant risks to those European sites (in the absence of mitigation) arise from potential construction-related surface water discharges. However, with the full implementation of the mitigation measures outlined in this NIS these risks will be avoided. Consequently, there will be no risk of adverse effects on qualifying interest/special conservation interest habitats or species, nor the attainment of specific conservation objectives, either alone or in combination with other plans or projects, for the relevant European sites. As a result, the constitutive characteristics of the two European sites concerned that are connected to the qualifying interests for which the sites have been designated will not be adversely affected.

The Stage 1 Screening appraisal contained in this report considered the potential for significant impacts arising from the proposed development on European sites within the potential zone of influence of the project. In this case the distance of 15km exceeds the potential zone of influence of the proposed works and any likelihood of significant effects in relation to European Sites beyond 15km can be ruled out. Following screening, the only European sites for which potential significant impacts have been identified are South Dublin Bay SAC (000210) and South Dublin Bay and River Tolka Estuary SPA (004024). Impacts which were considered to have the potential to affect these European sites related to the potential construction-related surface water discharges from the proposed development and the potential for these effects to reach downstream European sites. Potential cumulative impacts were also considered.

A range of precautionary measures have been incorporated into the project design, and other mitigation measures have been developed and proposed, with the purpose of avoiding or minimising impacts on the qualifying interests and conservation objectives of the relevant European sites. The efficacy of these measures was also considered and no issues in respect of their effective implementation were identified.

In conclusion, in the light of the best scientific knowledge, it is concluded that no reasonable scientific doubt remains as to the absence of adverse effects from the proposed development on any European site.
8 References


