

PROVISION OF INFORMATION REGARDING APPROPRIATE ASSESSMENT SCREENING PROPOSED RENOVATIONS AND ALTERATIONS TO SHANGANAGH PARK HOUSE, RATHSALLAGH AVE, SHANKILL, DUBLIN 18

PREPARED FOR DUN LAOGHAIRE RATHDOWN COUNTY COUNCIL

Project Reference:		170160			
Rev.	Status	Author	Reviewed By	Approved By	Issue Date
D01	Final	LH	PS	PS	29/8/17



TABLE O	F CONTENTS	
1 Intr	oduction	3
2 Me	thodology	3
3 Con	nclusions of the Screening Assessment	16
Referen	ces	17
LIST OF T	TABLES Overview of the Proposed Development and its Receiving Environment	5
Table 2	Analysis of European sites within 15km	8
LIST OF I	FIGURES AND APPENDICES	
Figure 1.	. All European sites within 15km of the site	15

1 Introduction

This report which contains information required for the competent authority to undertake a screening exercise for Appropriate Assessment (AA), was prepared by Scott Cawley Ltd. It provides information on and assesses the potential for the proposed development to significantly affect Natura 2000 sites (hereafter "European sites"¹).

It is necessary that the proposal has regard to Article 6 of the *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"). This is transposed in Ireland primarily by *the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011)* (hereafter the Birds and Habitats Regulations) and the Planning and Development (Amendment) Act, 2010 as amended.

An AA is required if likely significant effects on European sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects.

Following the preparation of this screening statement it was objectively concluded that there was <u>no</u> <u>likelihood of any significant effects on any European sites arising from the proposed development, either alone or in combination with other plans or projects. Therefore it was our view that an <u>Appropriate Assessment was not required in this instance</u>. The information in the tables below provide a summary of the information gathered for this screening exercise and the conclusions made.</u>

2 Methodology

This Screening Statement for Appropriate Assessment was prepared with regard to the following guidance documents, where relevant:

- Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 revision).
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2001); hereafter referred to as the EC Article 6 Guidance Document. The guidance within this document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC Environment Directorate-General, 2000a); hereafter referred to as MN2000.
- Communication from the Commission on the precautionary principle. European Commission (2000b).

The above referenced guidance sets out a staged process for carrying out Appropriate Assessment. To determine if Appropriate Assessment is required, documented screening is required. Screening identifies the likely effects on European sites, if any, which would arise from a proposed plan or project, either alone or in combination with other plans and projects.

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* - defined under the Planning Acts 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 (SACs) and Special Protection Areas (SPAs).



If the conclusions at the end of screening are that there is no likelihood of significant effects occurring on any European sites, as a result of the proposed plan or project, either alone or in combination with other plans and projects, then there would be no requirement to undertake Appropriate Assessment.

However, even if screening makes a finding of no significant effects, and therefore concludes that Appropriate Assessment is not required, these findings must be clearly documented in order to provide transparency of decision-making, and to ensure the application of the 'precautionary principle'².

Screening for Appropriate Assessment involves the following:

- Determining whether a project or plan is directly connected with or necessary to the conservation management of any European sites³;
- Describing the details of the project/plan proposals and other plans or projects that may cumulatively affect any European sites (see Table 1);
- Describing the characteristics of relevant European sites (Table 2); and
- Assessing the likelihood and significance of effects on relevant European sites (see Table 2).

The information that was collected to allow the competent authority to screen the proposal was based on a desktop study carried out on the 29th May 2016. Information relied upon included the following information sources, which included maps, ecological and water quality data:

- Ordnance Survey of Ireland mapping and aerial photography available from <u>www.osi.ie;</u>
- Online data available on European sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie;
- Information on land-use zoning from the online mapping of the Department of the Environment, Community and Local Government http://www.myplan.ie/en/index.html;
- Information on water quality in the area available from www.epa.ie;
- Information on the Eastern River Basin District from <u>www.wfdireland.ie;</u>
- Information on soils, geology and hydrogeology in the area available from www.gsi.ie;
- Information on the location, nature and design of the proposed development supplied by the applicant's design team;
- Information on the status of EU protected habitats in Ireland (National Parks & Wildlife Service, 2013a & 2013b);
- Information on the conservation status of birds in Ireland (Colhoun & Cummins, 2014).

The following planning and policy documents were relevant to the subject lands, in particular with regard to the assessment of other plans and projects with potential for cumulative effects

- National Biodiversity Plan 2011 2016 (Department of Arts, Heritage and the Gaeltacht, 2011);
- Dun-Laoghaire Rathdown County Development Plan 2016-2022 (Dún Laoghaire-Rathdown County Council, 2016); and,
- Eastern River Basin District, River Basin Management Plan 2009-2015.

² One of the primary foundations of the precautionary principle, and globally accepted definitions, results from the work of the Rio Declaration. Principle #15 declaration notes:

[&]quot;In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation."

³ In this instance the proposed development is not directly connected with or necessary to the conservation management of any European sites.



	cavicy
Table 1 Overview of the	e Proposed Development and its Receiving Environment
Brief Site Description	The subject lands are located at Shanganagh Park House, 18 Rathsallagh Avenue in Shankill Dublin 18 (Grid Reference O 25550 22549). The proposed development site consists of the existing buildings and the surrounding lands, occupied by Dun Laoghaire-Rathdown County Council in Rathsallagh. According to MyPlan.ie the subject lands are currently zoned as 'G1 – Open space, park' with a planning objective 'to preserve and provide for open space with ancillary active recreational amenities'.
Features of the Surrounding Environment	The desktop study found no records of any species or habitats for which European sites listed in Table 2 were designated within the subject lands or environs ⁴ . The following species (for which European sites listed in Table 2 were designated) were recorded within 2km of the proposed development site:
	 Black-headed Gull (Larus ridibundus)- recorded c. 240m south of the proposed development site (2012);
	 Turnstone (Arenaria interpres)- recorded c. 570m north-east of the proposed development site (2010);
	 Redshank (<i>Tringa totanus</i>)- recorded c. 450m east of the proposed development site (2011);
	 Otter (Lutra lutra) - recorded c. 950m north-east of the proposed development site at the West Pier (1980);
	 Harbour Porpoise (Phocoena phocoena)- recorded c.1.9km south-east of the proposed development site (2014);
	 Petalwort (Petalophyllum ralfsii)- recorded c.730m south-east of the proposed development site (2009);
	 Light-bellied Brent Goose (Branta bernicla) - recorded c. 380m north-east of the proposed development site (2010);
	 Golden Plover (Pluvialis apricaria)- recorded c. 510m north-east of the proposed site (2010);
	Black-tailed Godwit (Limosa limosa)- recorded c. 465m north-east of the proposed site (2010);
	 Oystercatcher (Haematopus ostralegus) - recorded c. 430m north-east of the proposed development site (2010);
	 Curlew (Numenius arquata)- recorded c. 460m north of the proposed development site (2010);
	Kittiwake (Rissa tridactyla)-recorded c. 770m north-east of the proposed development site (2010);
	Common Tern (Sterna hirundo) -recorded c. 660m north-west of the proposed development site (2011); and
	Ringed Plover (Charadrius hiaticula) – recorded c. 570m north-east of the proposed development site (2010).
	The proposed development site is located within the Avoca-Vartry catchment and the Dargle sub-catchment. According to the EPA Envision Map Viewer, the nearest watercourse is the Shanganagh River, located c. 420m north of the proposed development site. Killiney Bay waterbody is located 600m west of the proposed site.
	The groundwater body at the proposed development site is classified as 'Wicklow' and is described as 'Poorly productive bedrock'. According to the GSI Map Viewer, the level of vulnerability to groundwater contamination from human activities is 'Moderate'. It is described as 'Poorly productive bedrock'.

⁴ According to NBDC online data <u>www.biodiversity.ie</u> accessed 18th February 2016. This excludes NBDC records with a resolution greater than 1km².



Table 1 Overview of the	e Proposed Development and its Receiving Environment
	Aquifer – Bedrock which is generally unproductive except for Local Zones'. The bedrock of the area is classified as 'Dark blue-grey slate, phyllite & schist'.
	The proposed renovations and alterations will not result in any changes to the existing drainage system or any increase in foul loading. Foul effluent generated from the existing development (to which interior renovations and amendments are proposed) will be discharged to the existing sewer system, from which it will be transferred to Ringsend Wastewater Treatment Works (WWTW) for treatment prior to discharge into Dublin Bay. According to the EPA Envision Map Viewer Dublin Bay's coastal waters are "Unpolluted". Under the "Trophic Status Assessment Scheme" classification of the EPA, "Unpolluted" means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present (EPA, 2015). The most recent available water quality data for the Irish Sea indicates it is 'Unpolluted'
Description of the Proposed Development	Full details of the proposed development can be found in the applicants planning application. In brief, the proposed development will involve: an extension to an existing addition on the west side of Shanganagh Park House
	There is no net change in the level of occupancy in terms of generation of foul effluent. Full plans and elevations and details of the proposed development are provided in the Part 8 application documentation.
	There will be no net change in terms of the generation of additional surface water. Foul effluent generated from the proposed development will be discharged to the existing sewerage network, from which, it will be transferred to Ringsend WWTW to be treated prior to discharge into Dublin Bay.
Other existing or proposed	Existing habitat loss pressures
plans or projects nearby which may lead to cumulative effects on European sites.	The subject lands do not physically overlap with any European sites. They appear to be dominated by the existing building and hardstanding ground, none of which are habitats listed under Annex I of the Habitats Directive. These habitats are not indirectly connected with any habitats within European sites (e.g. by groundwater). No mobile fauna species for which European sites are designated are known to use the habitats within the subject lands. There is therefore no potential for cumulative effects relating to habitat loss.
	Existing pressures on water quality within European sites in proximity to the site
	Several intertidal habitats for which European Sites in Dublin Bay are designated are failing to meet favourable conservation status. For some of these, water pollution is considered to be a threat ranked as being of "high importance" (NPWS, 2013a).
	Pressures on European sites in Dublin Bay from surface waters

⁵ For example, "tidal mudflats and sandflats" was of "Inadequate" conservation status. This habitat was threatened by water pollution and was a reason for designation of North Dublin Bay SAC, and South Dublin Bay SAC. Under 'wetlands', the habitat was also a Special Conservation Interest of the South Dublin Bay and River Tolka Estuary SPA, and North Dublin Bay SPA.



Table 1 Overview of the Proposed Development and its Receiving Environment

There is potential for 'in-combination' effects of proposed plans and projects within the *Dublin City Development Plan 2016-2022*, *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, *Draft Fingal Development Plan 2017-2023* and other county level land use plans which can influence conditions in Dublin Bay via rivers and other surface water features. Dublin Bay is of 'Unpolluted' water quality status and the pollutant content of future surface water discharges to the Bay is considered likely to be decreased in the long-term. This is because it is an objective of the Greater Dublin Strategic Drainage Study, and all development plans within the catchment of Ringsend WWTW to include Sustainable Urban Drainage Systems in new development. Together these objectives are considered likely to reduce pressures on designated marine and intertidal species and habitats in Dublin Bay.

Other planning applications in the surrounding area

In the Dún Laoghaire-Rathdown County Development Plan 2016 – 2022, the proposed development site is zoned as 'M2 - City/Town/village Centre, central areas'. The lands in the vicinity of the proposed development site are zoned as 'Objective MTC – To protect, provide for and-or improve major town centre facilities' and 'To protect and-or improve residential amenity'.

Given the urban nature and zoning objectives of the area, there is likely to be a number of planning applications within the zone of influence of the project which have the potential to produce 'in combination' effects on water quality in Dublin Bay. However, the likelihood of impacts arising from the proposed development is deemed to be low due to the minimal scale of the proposed works (contained within the existing building), the urban land buffer between the site from Dublin Bay (i.e. c. 100m) as well as the nature (interior renovations and alterations), scale and temporary duration of the proposed works. No impacts are predicted during the operational phase of the proposed development, as neither foul effluent nor surface water runoff will be generated.

Conclusion for potential in-combination effects from surface waters during construction phase

It is our professional opinion that there will be no likelihood of significant effects on any European sites during the construction or operation of the proposed development, in combination with other plans or projects. This judgement was reached on the basis that:

- The coastal waters in Dublin Bay are classed as 'Unpolluted' by the EPA;
- It is an objective of all development plans within the catchment of Ringsend WWTW to include Sustainable Urban Drainage Systems for all new developments;
- Irish Water intends to upgrade the wastewater treatment infrastructure at Ringsend to facilitate the continued growth of the region⁶
- In the unlikely event of a pollution event occurring during construction, this would not be of such a magnitude that it would have a significant adverse effect on water quality in Dublin Bay.

⁶ it is intended that an application for planning permission will be made to An Bord Pleanála in early 2018.



European sites within 1km, 5km and 15km of the proposed development site are shown in Figure 1 overleaf.

Site name and code	Distance from Proposed Development (approximate)	Reasons for designation ⁷ (*= Priority Habitat)	Relevant source-pathway-receptor links between proposed development and European site? No sites are "Relevant" to the Proposed Development. (European sites are "Relevant" where a relevant source-pathway-receptor link8 exists).
Special Areas of Cons	ervation (SACs)		
South Dublin Bay SAC (000210)	Located c. 6.9km north of the proposed development site	Conservation Objectives Version 1.0 (22/08/13) Annex I Habitats: Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]	Whilst there is a potential linkage between the proposed development and the European site, no significant effects are predicted. 1. Surface waters generated during construction and operation could carry silt, oils, or other chemicals into the local surface water sewer network which discharges to Dublin Bay via the River Liffey. However, there will be no significant effects on the reasons for designation of the European site in view of the relevant conservation objectives. This judgement was informed by: — The temporary and small scale nature of any discharges related to construction of the site;

⁷ "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 February 2016.

For significant effects to arise, there must be a risk enabled by having a 'source' (e.g. construction works at a proposed development site), a 'receptor' (e.g. a SAC), and a pathway between the source and the receptor (e.g. a watercourse connecting a proposed development site to a SAC). The identification of a pathway does not automatically mean significant effects will arise. The likelihood for significant effects will depend upon the characteristics of the source (e.g. duration of construction works), the characteristics of the pathway (e.g. water quality status of watercourse receiving run-off from construction) and the characteristics of the receptor (e.g. the ecology including conservation status of the SAC reason for designation). When expert judgment determines, that significant effects are likely to arise, both the pathway, and the European site are considered "Relevant", and an Appropriate Assessment is triggered.



Table 2 Analys	is of European s	sites within 15km.	
			 The fact that the proposed works will be contained within the existing developed footprint;
			 The nature of the proposed works being limited in scale;
			 The urban land buffer that exists between the site and Dublin Bay and potential for dilution in the drainage network; and
			 The known potential for waters in Dublin Bay to rapidly mix and assimilate pollutants (Wilson & Jackson, 2011).
			2. Foul waters generated during operation will be treated at Ringsend WWTW and discharged into Dublin Bay within the European site. No significant effects were predicted for the reasons set out under "Potential for Cumulative effects upon European Sites" (See Table 1) including the fact that the proposed works will not result in an increase in foul loading on site.
Rockabill to Dalkey Island SAC (003000)	Located c. 2.3km northeast of the proposed development	Generic Conservation Objectives Version 4.0 (07/05/13)	No. See above for South Dublin Bay SAC (000210).
.5.44 5/10 (00000)		Annex I Habitats: • Reefs [1170]	
		Annex II Species:	
	site	 Phocoena phocoena (Harbour Porpoise) [1351] 	



North Dublin Bay SAC (000206)	Located c.	Conservation Objectives Version 1.0 (06/11/13)	No. See above for South Dublin Bay SAC (000210).
	12.1km north	Annex I Habitats:	
	of the proposed development	Mudflats and sandflats not covered by seawater at low tide [1140]	
	site	Annual vegetation of drift lines [1210]	
		Salicornia and other annuals colonizing mud and sand [1310]	
		Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]	
		Mediterranean salt meadows (Juncetalia maritimi) [1410]	
		Embryonic shifting dunes [2110]	
		• Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white du nes") [2120]	
		• *Fixed coastal dunes with herbaceous vegetation ("grey dunes") [2130]	
		Humid dune slacks [2190]	
		Annex II Species:	
		Petalophyllum ralfsii (Petalwort) [1395]	
Howth Head SAC	Located c.	Generic Conservation Objectives Version 4.0 (13/02/13)	No. See above for South Dublin Bay SAC (000210).
(000202)	14km north- east of the proposed development site.	Annex I Habitats:	
		Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	
		European dry heaths [4030]	
Ballyman Glen SAC (000713)	Located c.	Conservation Objectives Generic Version 4.0 (13/02/15)	No, due to the distance between the propose
	4.2km south-	Annex I Habitats:	development site and the European site and absence of a hydrological linkage between the
	west of the proposed	Petrifying springs with tufa formation (Cratoneurion) [7220]	absence of a hydrological linkage between the two
	development site.	Alkaline fens [7230]	



Knocksink SAC (000725)	Located c. 6.1km south- west of the	Conservation Objectives Generic Version 4.0 (13/02/15) Annex I Habitats:	No. See above for Ballyman Glen SAC (000713).
	proposed development site.	 Petrifying springs with tufa formation (Cratoneurion) [7220] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] 	
Bray Head SAC (000713)	Located c. 5km south-east of the proposed development site	Generic Conservation Objectives Version 4.0 (13/02/15) Annex I Habitats: • Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] • European dry heaths [4030]	No. See above for Ballyman Glen SAC (000713).
Wicklow Mountains SAC (002122)	Located c. 8.1km southwest of the proposed development site	Conservation Objectives Generic Version 4.0 (15/08/16) Annex I Habitats: Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with Erica tetralix [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Calaminarian grasslands of the Violetalia calaminariae [6130] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Annex II Species:	No. See above for Ballyman Glen SAC (000713).



Table 2 Analys	is of Furonean s	ites within 15km.	
-rable E - Allalys	or European s	Lutra lutra (Otter) [1355]	
Glen of the Downs SAC	Located c. 10.5km south of the proposed development site	Conservation Objectives Generic Version 4.0 (15/08/16) Annex I Habitats: Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]	
The Murrough Wetlands SAC	Located c. 14.7km southeast of the proposed development site	Conservation Objectives Generic Version 4.0 (15/08/16) Annex I Habitats: Annual vegetation of drift lines [1210] Perennial vegetation of stony banks [1220] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210] Alkaline fens [7230]	
Carriggower Bog SAC	Located c. 14.5km south of the proposed development site	Conservation Objectives Generic Version 4.0 (15/08/16) Annex I Habitats: • Transition mires and quaking bogs [7140]	
Special Protection A	reas (SPAs)		
South Dublin Bay and River Tolka Estuary (004024)	Located <i>c.</i> 6.7km northwest of the proposed development site	 Conservation Objectives Version 1.0 (09/03/15) Light-bellied Brent Goose (Branta bernicla hrota) [A046] [wintering] Oystercatcher (Haematopus ostralegus) [A130] [wintering] Ringed Plover (Charadrius hiaticula) [A137] [wintering] Grey Plover (Pluvialis squatarola) [A140] [wintering] Knot (Calidris canutus) [A143] [wintering] 	No. See above for South Dublin Bay SAC (000210). There is no risk of disturbance to Special Conservation Interest bird species given the relatively small scale and temporary nature of construction works associated with the proposed development and the distance between the proposed development and the European site.



			cavi
Table 2 Analys	sis of European s	ites within 15km.	
		 Sanderling (Calidris alba) [A144] [wintering] Dunlin (Calidris alpina) [A149] [wintering] Bar-tailed Godwit (Limosa lapponica) [A157] [wintering] Redshank (Tringa totanus) [A162] [wintering] Black-headed Gull (Croicocephalus ridibundus) [A179] [wintering] Roseate Tern (Sterna dougallii) [A192] [passage] Common Tern (Sterna hirundo) [A193] [breeding] Arctic Tern (Sterna paradisaea) [A194] [passage] Wetlands & Waterbirds [A999] 	
Dalkey Islands SPA (004172)	Located c. 4.1km northeast of the proposed development site	 Generic Conservation Objectives Version 4.0. (15/08/16) Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo)[A193] Arctic Tern (Sterna paradisaea) [A194] 	No. See above for South Dublin Bay SAC (000210). There is no risk of disturbance to Special Conservation Interest bird species given the relatively small scale and temporary nature of construction works associated with the proposed development and the distance between the proposed development and the European site.
North Bull Island SPA (004006)	Located c. 12.1km north of the proposed development site	Conservation Objectives Version 1.0 (09/03/15) Light-bellied Brent Goose (Branta bernicla hrota) [A046] [wintering Shelduck (Tadorna tadorna) [A048] [wintering] Teal (Anas crecca) [A052] [wintering] Pintail (Anas acuta) [A054] [wintering] Shoveler (Anas clypeata) [A056] [wintering] Oystercatcher (Haematopus ostralegus) [A130] [wintering] Golden Plover (Pluvialis apricaria) [A140] [wintering] Grey Plover (Pluvialis squatarola) [A141] [wintering] Knot (Calidris canutus) [A143] [wintering]	No. See above for South Dublin Bay SAC (000210). There is no risk of disturbance to Special Conservation Interest bird species given the relatively small scale and temporary nature of construction works associated with the propose development and the distance between the proposed development and the European site.



Table 2 Analys	is of European s	ites within 15km.	
		 Dunlin (<i>Calidris alpina</i>) [A149] [wintering] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] [wintering] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] [wintering] Curlew (<i>Numenius arquata</i>) [A160] [wintering] Redshank (<i>Tringa totanus</i>) [A162] [wintering] Turnstone (<i>Arenaria interpres</i>) [A169] [wintering] Black-headed Gull (<i>Croicocephalus ridibundus</i>) [A179] [wintering] 	
		Wetlands & Waterbirds [A999]	
Wicklow Mountains SPA (004040)	Located c. 8.4km southwest of the proposed development site	 Conservation Objectives Generic Version 4.0 (15/08/16) Merlin Falco columbarius [A098] Peregrine Falco peregrinus [A103] 	No, due to the distance between the proposed development site and the European site and the absence of a hydrological linkage between the two.
Howth Head Coast SPA (004113)	Located 14.1km north-east of the proposed development site	Conservation Objectives Generic Version 5.0 (15/08/2016) • Kittiwake (Rissa tridactyla) [A188]	No. See above for South Dublin Bay SAC (000210). There is no risk of disturbance to Special Conservation Interest bird species given the relatively small scale and temporary nature of construction works associated with the proposed development and the distance between the proposed development and the European site.

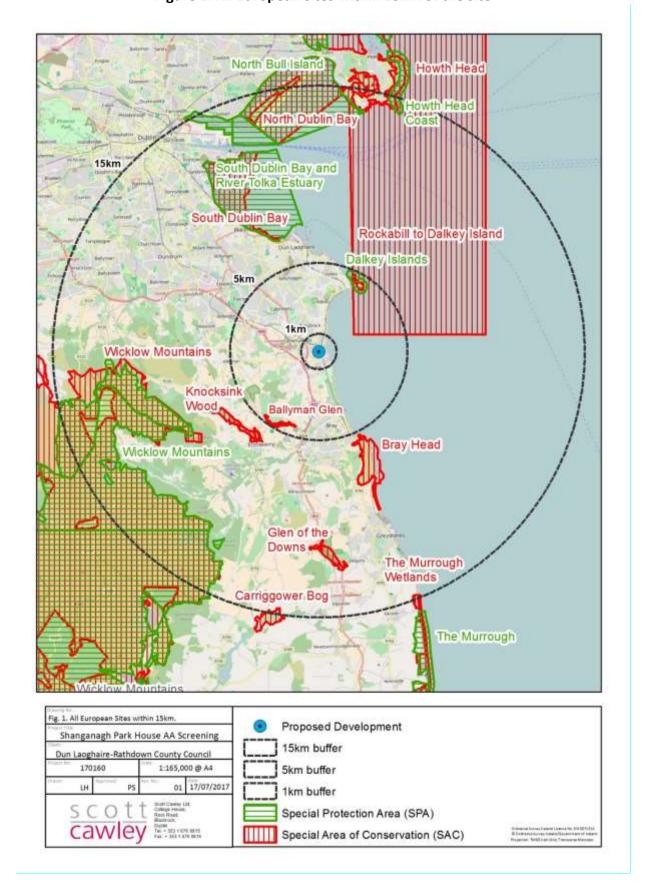


Figure 1. All European sites within 15km of the site



3 Conclusions of the Screening Assessment

Following an examination, analysis and evaluation of the relevant information including, in particular, the nature of the proposed works and the potential relationship between the proposed development and relevant European sites and, applying the precautionary principle, it is the professional opinion of the authors of this report that there will be no likelihood of significant effects on any European sites, arising either from the proposed development alone or in combination with other plans or projects. This judgement has been reached for the reasons outlined below.

The AA screening process has identified that a number of European Sites in the Irish Sea lie within the potential zone of influence of the proposed Plan. However, for the reasons outlined below no European Sites are deemed to be at risk of likely significant effects from the proposal.

Surface Water

Surface waters generated during construction and operation could carry silt, oils, or other chemicals into the local surface water sewer network which discharges to Dublin Bay via the River Liffey. No significant adverse effects are predicted due to the following:

- The temporary and small scale nature of any discharges related to construction of the site:
- The fact that the proposed works will be contained within the existing developed footprint;
- The nature of the proposed works being interior renovations and alterations;
- The urban land buffer that exists between the site and Dublin Bay and potential for dilution in the drainage network; and;
- The known potential for waters in Dublin Bay to rapidly mix and assimilate pollutants (Wilson & Jackson, 2011).

Foul Water

Foul waters generated during operation will be treated at Ringsend WWTW and discharged into Dublin Bay within the European site. No significant effects were predicted due to the following:

the fact that the proposed works will not result in an increase in foul loading on site

- The coastal waters in Dublin Bay are classed as 'Unpolluted' by the EPA;
- Irish Water intends to upgrade the wastewater treatment infrastructure at Ringsend to facilitate the continued growth of the region⁹; and;
- In the unlikely event of a pollution event occurring during construction, this would not be of such a magnitude that it would have a significant adverse effect on water quality in Dublin Bay.

For these reasons, it is the professional opinion of the authors of this report that the application for planning permission for the proposed development does not require an Appropriate Assessment.

 $^{^{9}}$ it is intended that an application for planning permission will be made to An Bord Pleanála in early 2018.

References

BirdLife International (2013). IUCN Red List for birds. Downloaded from http://www.birdlife.org in November 2013.

Colhoun K. & Cummins S. (2014). *Birds of Conservation Concern in Ireland 2014–2019.* BirdWatch Ireland.

Council of the European Communities (1992) *Council Directive of 21 May 1992 on The Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC).* O. J. L 206/35, 22 July 1992.

DoEHLG (2010). Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (Department of Environment, Heritage and Local Government, Rev Feb 2010).

DoAHG (2011). Actions for Biodiversity, National Biodiversity Plan.

Dún Laoghaire-Rathdown County Council (2016). Dun-Laoghaire - Rathdown County Development Plan 2016-2022.

Eastern River Basin District (2009). Eastern River Basin District, River Basin Management Plan 2009 – 2015.

Environmental Protection Agency (2015). *Water Quality in Ireland. 2010-2012.* Available online at http://www.epa.ie/pubs/reports/water/waterqua/wqr20102012/#.VeQvR_IViko

European Commission (EC) (updated April 2015). *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (EC Environment Directorate-General, 2000); hereinafter referred to as "MN2000".

European Commission (EC) (2000a). Managing Natura 2000 sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC Environment Directorate-General, 2000); hereinafter referred to as "MN2000".

European Commission (EC) (2000b). Communication from the Commission on the precautionary principle.

European Commission (EC) (2001). Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General).

European Commission (EC) (2007). Guidance Document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence. Opinion of the European Commission.

European Parliament and European Council (2009). Directive 2009/147/EC of 30th November 2009 on the Conservation of Wild Birds (2009/147/EC). O.J. L20/7, 26th January 2010.

NPWS (2010). Circular NPW 1/10 & PSSP 2/10 Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, March 2010).

NPWS (2013a). The Status of EU Protected Habitats and Species in Ireland. Species Assessments Volume 2, Version 1.0. Unpublished Report, National Parks & Wildlife Services. Department of Arts, Heritage and the Gaeltacht, Dublin, Ireland.

NPWS (2013b). *The Status of EU Protected Habitats and Species in Ireland.* Species Assessments Volume 3, Version 1.0. Unpublished Report, National Parks & Wildlife Services. Department of Arts, Heritage and the Gaeltacht, Dublin, Ireland.