

# Ludford Meadowbrook Play Space, Ballinteer

### **AA Screening**

13/10/2025

**Prepared for: Dun Laoghaire Rathdown County Council** 

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This report describes work commissioned by Linda-Jane Kenny of Dun Laoghaire Rathdown County Council (DLRCC) by an instruction dated 09/09/2025. The Client's representative for the contract was Linda-Jane Kenny of DLRCC. Jai Dolan and Patricia Byrne of JBA Consulting carried out this work.



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#### **Abbreviations**

AA Appropriate Assessment

BOCCI Birds of Conservation Concern in Ireland

CIEEM Chartered Institute of Ecology and Environmental Management

DEHLG Department of Environment, Heritage and Local Government

DHPLG Department of Housing, Planning and Local Government

DLRCC Dun Laoghaire Rathdown County Council

EC European Communities

EclA Ecological Impact Assessment

ECJ European Court Judgement

EPA Environmental Protection Agency

GIS Geographic Information Systems

GSI Geological Survey Ireland

IAQM Institute of Air Quality Management

INNS Invasive Non-Native Species

IROPI Imperative Reasons of Over-riding Public Interest

NBDC National Biodiversity Data Centre

NIS Natura Impact Statement

NPWS National Parks and Wildlife Services

OPW Office of Public Works

QI Qualifying Interest

RBMP River Basin Management Plan
SAC Special Area of Conservation

SCI Special Conservation Interest

SPA Special Protection Area

WFD Water Framework Directive

Zol Zone of Influence



#### 1 Introduction

#### 1.1 Background

JBA Consulting Engineers and Scientists Ltd. (hereafter JBA) has been commissioned by Linda-Jane Kenny of DLRCC to prepare an Appropriate Assessment Screening Report for the proposed installation of a play space area at the greenspace backlands of Ludford Drive and Acord Road, adjacent to the Wyckham Stream, in Ballinteer, Dublin 16. It provides information on and assesses the potential in view of best scientific knowledge for the development to have likely significant effects, either individually or in combination with other plans or projects, on any Natura 2000 site.

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) (the "Habitats Directive") requires that, any plan or project not directly connected with or necessary to the management of European sites, but likely to have significant effects thereon, either individually or in combination with other plans or projects, shall be subject to AA of its implications for the European sites in view of their conservation objectives. The requirements of Article 6(3) of the Habitats Directive have been transposed into Irish law by Part XAB of the Planning and Development Act 2000 (as amended) and the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended).

#### 1.2 Legislative Context

Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora, known as the 'Habitats Directive' - provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of European Community interest, at a favourable conservation status. Articles 3 - 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000 sites. Natura 2000 sites are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79 / 409 / EEC).

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans or projects affecting Natura 2000 sites.

Article 6(3) establishes the requirement for Appropriate Assessment:

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



Article 6(4) deals with the steps that should be taken when it is determined, as a result of Appropriate Assessment, that a plan/project will adversely affect a European site. Issues dealing with alternative solutions, imperative reasons of overriding public interest and compensatory measures need to be addressed in such a case.

#### Article 6(4) states:

"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and / or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

The requirements of Articles 6(3) and 6(4) of the Habitats Directive have been transposed into Irish legislation by means of inter alia the European Communities (Birds and Natural Habitats) Regulations 2011-2015 (S.I. No. 477 / 2011) as amended.

#### 1.3 Appropriate Assessment Process

Guidance on the AA process was initially produced by the European Commission in 2002, which was subsequently developed into guidance specifically for Ireland by the Department of Environment, Heritage and Local Government (DEHLG) (2009, rev 2010). Office of the Planning Regulator (OPR) produced a Practice Note in 2021, PN01 - Appropriate Assessment Screening for Development Management (OPR, 2021). These guidance documents identify a staged approach to conducting an AA, as shown in Figure 1-1.

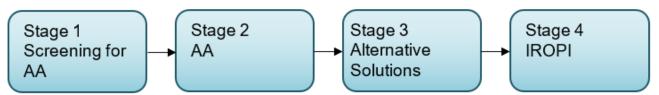


Figure 1-1: The Appropriate Assessment Process (from: Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities, DEHLG, 2009)

#### 1.3.1 Stage 1 - Screening for AA

The initial, screening stage of the Appropriate Assessment is to determine:

- whether the proposed plan or project is directly connected with or necessary for the management of the European designated site for nature conservation (Natura 2000 site)
- if it is likely to have a significant effect on the European designated site, either individually or in combination with other plans or projects

For those sites where, potential likely significant effects are identified, either alone or in combination with other plans or projects, further assessment is necessary to determine if the



proposals will have an adverse impact on the integrity of a European designated site, in view of the site's conservation objectives (i.e., the process proceeds to Stage 2).

#### 1.3.2 Stage 2 - AA

This stage requires a more in-depth evaluation of the plan or project, and the potential direct and indirect impacts of them on the integrity and interest features of the European designated site(s), alone and in-combination with other plans and projects, taking into account the site's conservation objectives. Where required, mitigation or avoidance measures will be suggested.

The competent authority can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site(s) concerned. If this cannot be determined, and where mitigation cannot be achieved, then alternative solutions will need to be considered (i.e., the process proceeds to Stage 3).

#### 1.3.3 Stage 3 - Alternative Solutions

Where adverse impacts on the integrity of Natura 2000 sites are identified, and mitigation cannot be satisfactorily implemented, alternative ways of achieving the objectives of the plan or project that avoid adverse impacts need to be considered. If none can be found, the process proceeds to Stage 4.

#### 1.3.4 Stage 4 - Imperative Reasons of Over-riding Public Interest (IROPI)

Where adverse impacts of a plan or project on the integrity of Natura 2000 sites are identified and no alternative solutions exist, the plan will only be allowed to progress if imperative reasons of overriding public interest can be demonstrated. In this case compensatory measures will be required.

The process only proceeds through each of the four stages for certain plans or projects. For example, for a plan or project, not connected with management of a site, but where no likely significant effects are identified, the process stops at stage 1. Throughout the process, the precautionary principle must be applied, so that any uncertainties do not result in adverse impacts on a site.

This report is in support of a Stage 1 Screening for Appropriate Assessment.

#### 1.3.5 Court of Justice of the European Union (CJEU) Rulings

The CJEU has been asked to issue rulings on development plans, which are used to inform this assessment.

The CJEU issued a ruling on the consideration of avoidance and reduction measures as a result of the case known as People over Wind, Peter Sweetman v Coillte Teoranta (Case C-323/17). This judgement stated that measures intended to reduce or avoid effects on a European site should only be considered within the framework of an AA, and it is not permissible to take into account such measures at the screening stage. In practice, this means that any activities that are not integral to the project (i.e. the project could conceivably take place without them) and have the effect of avoiding or reducing an impact on a European site, cannot be considered at the screening stage.



More recently, the decision of the CJEU in case C-721/21 (Eco Advocacy CLG v An Bord Pleanála), delivered in June 2023, found that Article 6(3) of the Habitats Directive must be interpreted as meaning that:

"in order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site." (Para. 53(3) of the Judgement).

This recent judgement therefore clarifies that features which have been incorporated into a project as standard features, inherent in that project, and irrespective of any effect on any European site may be taken into account for the purposes of a Stage 1 Screening for Appropriate Assessment under Article 6(3) of the directive.

The CJEU ruling in Grace & Sweetman (C-164/17) [2018] clarified the difference between avoidance and reduction (mitigation) measures and compensation. Measures intended to compensate for the negative effects of a project cannot be taken into account in the assessment of the implications of a project, and instead are considered under Article 6(4). This means that any project where an effect on the integrity of a Natura 2000 site remains and can only be offset by compensation, would need to proceed under Article 6(4), demonstrating "imperative reasons of overriding public interest".

The CJEU ruling in the case of Holohan v An Bord Pleanála (C-461/17) [2018] also clarified the importance in Appropriate Assessment of taking into account habitat types and species outside the boundary of the Natura 2000 site where implications of the impacts on those habitat and species may impact the conservation objectives of the Natura 2000 site. In this assessment functionally linked and supporting habitat for species outside of Natura 2000 sites are assessed where they could potentially impact the conservation objectives of any Natura 2000 sites within the Zone of Influence (ZoI).

The CJEU ruling in response to questions referred by the Irish High Court in the Eco Advocacy CLG Case (C 721/21) [2023] indicated that an applicant for permission in its AA screening report/and a decision maker in undertaking its AA screening can take into account "standard features", i.e. all the constituent elements of that project inherent in it/elements that are incorporated into a projects design not with the aim of reducing its negative effects (even where these have the effect of reducing harmful effects on a European site).

#### 1.4 Methodology

The Screening for Appropriate Assessment has been prepared having regard to the Birds and Habitats Directives, the European Communities (Birds and Natural Habitats) Regulations 2011-15 as amended and relevant jurisprudence of the EU and Irish courts. The following documents have also been used to provide guidance for the assessment:

 DEHLG (2009 rev 2010) Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government (DEHLG, 2009).



- Office of the Planning Regulator (2021) OPR Practice Note PN01 Appropriate Assessment Screening for Development Management (OPR, 2021).
- European Communities (EC) (2019) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, OJ C, C/33, 25.01.2019, p. 1.
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites -Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, 2021/C 437/01 (OJ C, C/437, 28.10.2021, p. 1.
- EC (2022) Guidance document on assessment of plans and projects in relation to Natura 2000 sites A summary (European Commission. Directorate General for Environment)
- EEC (October 2021) Guidance document on the strict protection of species of Community interest under the Habitats Directive 92/43/EEC
- CIEEM (2024). Guidelines for Ecological Impact Assessment in the UK and Ireland -Terrestrial, Freshwater and Coastal, Second Ed. (Chartered Institute of Ecology and Environmental)

#### 1.4.1 Screening Methods

This screening assessment uses the source-pathway-receptor (S-P-R) model as outlined in guidance (OPR, 2021). Using the source-pathway-receptor model allows for the potential significant effects to be eliminated if no viable source, pathway, or receptor is present.

The S-P-R method uses an examination of the construction methods or project description allows sources of impact to be determined. This also allows a zone of influence (ZoI) for the project to be generated based on the size, scale and nature of the works involved. The pathways for impact are also analysed to see if a functional pathway for impact is present. This report analyses three pathways: surface water, groundwater and land. Using information gathered from desk sources (e.g. mapped qualifying interests from the Conservation Objectives (CO) for the site) and from field surveys, receptors within the zone of influence are identified. In some cases, sensitive receptors may also play a role in determining the zone of influence. If any of the three parts to the model are not present (source-pathway-receptor) the potential for a likely significant effect from the project on the Natura 2000 network can be discounted.

#### 1.4.2 Likely Significant Effect Test

The test for AA Screening is whether the project could have a 'likely significant effect' on any Natura 2000 site. A likely significant effect is defined as any effect that could undermine the conservation objectives of a Natura 2000 site, either alone or in combination with other plans or projects. There must be a causal connection between the project and the qualifying interest of the site which could result in possible significant effects on the site. The likely significant effect test is a lower threshold for the screening assessment than 'adverse effect on site integrity' considered at Appropriate Assessment stage (Stage 2) as screening is intended to be a preliminary examination for potential effects.

The Zone of Influence was used to identify Natura 2000 sites that could be impacted by the project. For each of these sites, the Qualifying Interest (QI) or Special Conservation Interests (SCI) features and their associated conservation objectives were identified, and the possibility of likely significant effect was determined by a combination of location, ecological and hydrological connectivity, sensitivity of receptor and magnitude of the source of impact.



#### 1.4.3 Desktop study

A desktop study was conducted of available published and unpublished information, along with a review of data available on the National Parks and Wildlife Service (NPWS), Botanical Society of Britain and Ireland (BSBI) and National Biodiversity Data Centre (NBDC) web-based databases, in order to identify key habitats and species (including legally protected and species of conservation concern) that may be present within ecologically relevant distances from the project as explained below. A baseline habitat assessment was performed using satellite imagery of the site. The data sources below (accessed September 2025) were consulted for the desktop study:

- Aerial photography available from www.osi.ie and ESRI World Imagery.
- NPWS website (www.npws.ie) where Natura 2000 site synopses, data forms and conservation objectives were obtained along with Annex I habitat distribution data and status reports.
- River Basin Management Plans (www.wfdireland.ie)
- NBDC Biodiversity Maps (maps.biodiversityireland.ie)
- Environmental Protection Agency Maps (https://gis.epa.ie/EPAMaps)
- Geological Survey Ireland (GSI) website (www.gsi.ie)
- GSI Groundwater data viewer (https://dcenr.maps.arcgis.com)
- BSBI Plant Records (bsbi.org/maps)

#### 1.4.4 In-Combination Effects

In relation to the assessment of potential of in-combination effects, where there is no effect at all via a pathway, there is no possibility of in-combination effects. Where potential likely significant effects are identified, the in-combination assessment is carried forwards to a Stage 2 Appropriate Assessment.

#### 1.5 Competent persons

The assessment was prepared by Jai Dolan BSc (Hons) Geography, MSc in Conservation. Jai is an Assistant Ecologist with JBA Consulting and has one years' experience in ecological consultancy.

The assessment has been reviewed by Patricia Byrne BSc (Hons) Zoology, PhD, MCIEEM. Patricia is Principal Ecologist with JBA Consulting, with over 20 years' experience in environmental and ecological research, teaching and reporting; and with eight years in ecological consultancy. Patricia is a full Member of the Chartered Institute of Ecological and Environmental Management (CIEEM).

#### 1.6 Limitations and Constraints

This AA Screening is based on ecological site surveys and existing data from the abovementioned sources. The screening assessment necessarily relies on some assumptions and is inevitably subject to some limitations as detailed below. These do not affect the conclusion, but the following points are recorded in order to ensure the basis of the assessment is clear:

• Information on the works and conditions on site are based on current knowledge at the time of writing. The area of the proposed site was not surveyed as a previous survey



had been done of an area of Meadowbrook Park adjacent to the site in May 2025 (JBA, 2025), which encompassed an ecologically sensitive area of stream along the site's northern boundary. Changes since the May 2025 site survey of Meadowbrook Park referenced in this report cannot be accounted for. However, this previous site survey has followed CIEEM (2019) advice note on the lifespan of ecological reports and surveys.

- Adverse weather can cause delays to the schedule and alter the timing of works. This has been accounted for using a worst-case scenario where possible.
- Data from biological record centres or online databases is historical information, and datasets may be incomplete, inaccurate, or missing. The absence of records for an area may be due to the under recording in the area and not necessarily imply the absence of species. These records are therefore to be treated as minimum information available for the area
- The precautionary principle is used at all times when determining potential ecological sensitivity of the site.
- Any changes to the proposed works will require an assessment by a suitably qualified ecologist to determine if re-assessment is required.

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### 2 Project Description

#### 2.1 Project location

The proposed project is located within the greenspace between Ludford Drive and Acord Road, and adjacent to the Wyckham Stream, in Ballinteer, Dublin 16. The site is located to the southeast of the main Meadowbrook Park area, where several grass football pitches are located. The site is located approximately 90m to the east of the Meadowbrook DLR Leisure Services. Wyckham Stream (Dodder\_050), a tributary of the Dodder River is located within 6m of the site's northern boundary. The site is also located approximately 470m to the east of the Broadford Road, and approximately 490m to the east of the Little Dargle Dog Park (Figure 2-1).

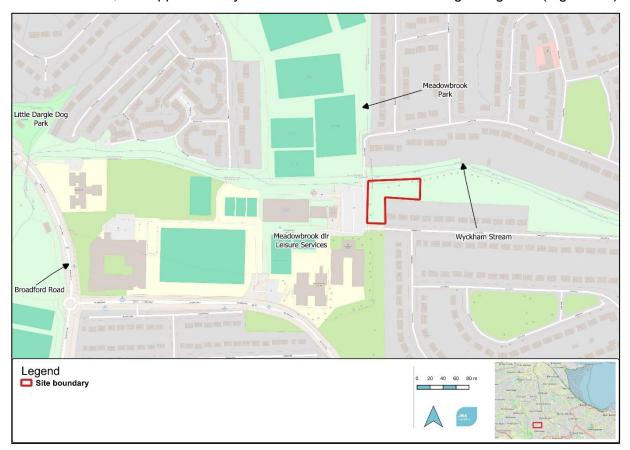


Figure 2-1: Site location (©OSM, 2025)

#### 2.2 Project Description

The proposed works involve the installation of a new play space at Ludford Meadowbrook, Ballinteer, Dublin 16. The scope of works is expected to include breaking the existing ground, removing and storing the topsoil and grass sod, drainage if required, re-seeding, installation of play equipment and safety surfaces, bitmac paths, chestnut pale fencing and additional planting of trees.

The following equipment will be included within the proposed play space:



- KRS8200837 Robinia Mill Wheel/Mining Unit.
- NRO906 Swing Frame Bird's Nest Seat x1.
- JUM105 Jumper Rectangle.
- ELE400064 Tipi Carousel.
- NRO876 Cableway for Level Ground.
- NRO815 Hammock.
- NRO903 Five Way Swing with Inclusive Seat x1 and Flat Seat x4.
- ELE400024 Spinner Bowl.
- NRO922-Swing Frame Cradle Seat x2.
- KSL30301 Embankment Slide 1.5m high.
- NRO528 Oasis Sand House and Crane.
- NRO209 Sitting Poles.
- NRO930939 Robinia Tunnel.
- NRO803 Double Balance Beam.
- TPP280024 Sensory Multi Play Panel.
- TPP280028 Kaleidoscope Play Panel.
- TPP280029 Rattle Roller Wheel.
- IE-PECS Communication Board.

#### **Summary of Play Area**

Summary of play equipment- Meadowbrook Ludford Ballinteer There will be approx. 5-metre buffer area between the play space and the Whicham Stream. This consists of trees, grass, the active travel route, and riparian meadow. The play equipment for the new Meadowbrook Ludford play space is designed for age groups 0-11 years of age. There will be two areas within the main play space. A toddle area (0-5) which includes a large sand playhouse unit with geotextile membrane under the sand (400mm depth), embankment slide, sensory units, of wooden structure, springers, rotating disc, toddler swings look out mound, granite boulders, wooden sleeper steps for climbing and mounds for natural free play. This will enclose the space with chestnut pale fencing and double flat top closing gate (marked in red line on the drawings). The equipment and materials used predominantly made from Robina wood and galvanised steel. The main play space with play equipment more suitable for children age 5-11 years +. This plays space will feature a generous proportion of equipment suitable for inclusive, and intergeneration play and with a bespoke mill play piece. The addition of the zipwire located along the open space at the back of Ludford Drive. There is also an accessible trampoline & wheelchair orbit, hammock, assorted swings, nest and climbing frame. There will be signage erected at the entrance of the play space such as a composite communications board and DIr rules, Communications board signage. The accessible paths and bike parking will be excavated



to 200mm, infill with hardcore base and finished surface is bitmac edged with a pin kerb edging. A Willow dome arch as an alternative play/ walk feature. The bike parking will consist of 3 Sheffield bike stands and cargo bike parking. The safety surfaces around the play equipment will be excavated, subbase hardcore 200mm and topped to the recommended safety depth with resin bond rubber mulch and resin bound. Safa grass (rubber matting) will be put on top of grass around equipment in fall zone areas where necessary to a width of one metre. New mounds and exposed soil with be reseeded with perennial mix of lawn/grass seed on completion.

Site layout drawing is seen in Appendix A.

#### 2.3 Excavation Depths

Excavation is expected to be limited to the topsoil.

#### 2.4 Construction Duration

The expected duration of construction is 3 months.

#### 2.5 Drainage layout

No surface water drainage infrastructure is expected to be required as part of the project. The proposed play spaces will not generate any foul water and minimal additional surface water from play equipment.

#### 2.6 Zone of Influence

The ZoI is considered using the Source-Pathway-Receptor model (OPR, 2021), therefore only designated sites that are connected to the project site are recorded and assessed. This ZoI uses the precautionary principle, as the work is primarily anticipated to only impact the footprint of the site. Connections are assessed for impacts relating to noise disturbance (400m - Cutts et al, 2013), air pollution (emissions and dust) (250m), and any SACs or SPAs beyond these distances that may have QI / SCI species that utilise habitats within these areas. The ZoI for air pollution was considered as per the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (IAQM, 2024), including ex-situ habitats used by QI and/or SCI species associated with local Natura 2000 sites. The project will primarily affect the site only, but a wider ZoI is used for impacts relating to the following:

- Surface water any downstream hydrological connections to Natura 2000 site(s);
- Groundwater determined by the underlying aquifer (Regionally Important Fissured Bedrock Aquifer 5km within aquifer);
- Air (disturbance) noise disturbance to supporting ex-situ habitat(s) of QI and/or SCI species within or adjacent to the site (400m);
- Air (emissions and dust) air pollution (250m) using IAQM guidance and the precautionary principle; and
- Land physical disturbance to supporting ex-situ habitat(s) of QI and/or SCI species within or adjacent to the site.



### 3 Existing Environment

#### 3.1 Baseline Conditions

The existing habitats onsite include amenity grassland, grassy verges, and treelines. Within 6m of the site's northern boundary is a tributary of the River Dodder (Dodder\_050). The habitats adjacent to this section of this stream were previously surveyed on 19/05/2025 by JBA Ecologists Matt Hosking and Jai Dolan for a separate project undertaken for DLRCC (JBA, 2025). During this project, the habitats within the main section of Meadowbrook Park to the northwest of the site were surveyed. It is likely the species present within the main body of the park are consistent with the proposed site given their proximity and the same management strategies being used in both park areas. As a result, JBA did not conduct an ecological site survey as part of this AA Screening.

#### 3.2 Habitats

Aerial imagery, street view, and a previous survey of Meadowbrook conducted in May 2025 by JBA Ecologists (2025) were used for a preliminary habitat assessment.

The habitats recorded during this assessment and the previous survey of Meadowbrook Park are listed below in Table 3-1 and mapped in Figure 3-1. These habitats are described in more detail within the following sub-sections.

Table 3-1: Habitats recorded previously adjacent to the site and during preliminary habitat assessment

Fossitt Code	Fossitt Habitat		
BL3	Buildings and artificial surfaces		
FW2	Depositing/lowland rivers		
GA2	Amenity grassland (improved)		
GS2	Dry meadows and grassy verges		
WL2	Treelines		





Figure 3-1: Habitat map of proposed site (©OSM, 2025)

#### 3.2.1 Buildings and artificial surfaces (BL3)

A path area consisting of tarmacked surfaces runs along the site's northern boundary.

#### 3.2.2 FW2 Depositing/lowland rivers

To the north of the proposed play space is a section of the Wyckham Stream. This habitat was surveyed on 19/05/2025 for a separate project (JBA, 2025). Water levels were low at the time of the survey and artificial debris was present within the channel. The channel was between one and three metres wide. The banks were heavily vegetated at the time of the survey. Species recorded within this habitat include Brooke Lime *Veronica beccabunga*, Cow Parsley *Anthriscus sylvestris*, and Forget-me-not species *Myosotis* spp..

#### 3.2.3 Amenity grassland (improved) (GA2)

The majority of the proposed site area is comprised of amenity grassland habitat.

The main body of Meadowbrook Park located to the northwest of the site also consists of amenity grassland habitat (Figure 3-2). During a site visit to Meadowbrook Park for a separate project, the floral species Chickweed *Stellaria media*, Common Daisy *Bellis perennis*, Creeping Buttercup *Ranunculus repens*, Dandelion species, Perennial Ryegrass *Lolium perenne*, Ribwort Plantain *Plantago lanceolata*, White Clover, and Yorkshire Fog *Holcus lanatus* were recorded within this habitat. It is likely that these species are consistent with the species found within the



amenity grassland habitat within the proposed site given the similar nature of the site, their proximity, and the similar grassland management strategies used in both areas i.e. mowing regimes.

Bird species recorded within this habitat include Barn Swallow *Hirundo rustica*, Magpie *Pica pica*, Rook *Corvus frugilegus*, Starling *Sturnus vulgaris*, and Wood Pigeon *Columba palumbus*.



Figure 3-2: Amenity grassland habitat in neighbouring Meadowbrook Park area

#### 3.2.4 Dry meadows and grassy verges (GS2)

A grassy verge is located along a fence running along the site's western and southern boundaries. There is an additional grassy verge running between the proposed site and a tributary of the River Dodder (Dodder\_050) running to the north of the site. This grassy verge was surveyed in May 2925 by JBA for a separate project (JBA, 2025). Floral species recorded include within this verge include Broad-leaved Dock *Rumex obtusifolius*, Common Bent *Agrostis capillaris*, Creeping Buttercup, Creeping Thistle *Cirsium arvense*, Cow Parsley, Cranesbill species *Geranium* spp., Curly Dock, Dandelion species, Field Mustard *Rhamphospermum arvense*, Germander Speedwell *Veronica chamaedrys*, Hedge Bindweed *Calystegia sepium*, Hogweed *Heracleum sphondylium*, Ivy *Hedera helix*, Meadow Buttercup *Ranunculus acris*, Nettle *Urtica dioica*, Perennial Ryegrass, Spear Thistle *Cirsium vulgare*, and White Clover.



#### 3.2.5 Treeline (WL2)

Treelines run along the site's western and northern boundaries, as well as part of the site's eastern and southern boundaries. These treelines appear to be of mixed age. A treeline was also recorded adjacent to the Dodder\_050 surface watercourse during a survey for a separate project (JBA, 2025), to the north of the site. Tree species recorded within this treeline include Ash *Fraxinus excelsior*, Norway Spruce *Picea abies*, and Oak species *Quercus* spp. Ground floral species recorded within this treeline include Creeping Thistle, Field Mustard, Hedge Bindweed, Ivy and Nettle.

Bird species recorded within this treeline include Robin *Erithacus rubecula* and Wren *Troglodytes troglodytes*.

Invertebrate species recorded within this habitat include White-tailed Bumblebee *Bombus lucorum*.

The invasive Sycamore *Acer pseudoplatanus* was recorded within this treeline. The invasive Grey Squirrel *Sciurus carolinensis* was also recorded.

#### 3.3 Protected Fauna

While no specific site visit was carried out for this project, JBA ecologists conducted a walkover survey of an area of Meadowbrook Park to the northwest of the site and an area of the Dodder\_050 surface watercourse at the north of the site on 19/05/2025. During this survey, two protected species were recorded, Barn Swallow and Starling. Both of these species are Amber listed on the list for Birds of Conservation Concern Ireland (BoCCI) (Gilbert et al., 2021). These species are not QIs/SCIs associated with the Natura 2000 sites within the ZoI and so will not be addressed within this report.

#### 3.4 Protected Flora on Site

While no site visit was carried out for this project, JBA ecologists conducted a walkover survey of an area of Meadowbrook Park to the northwest of the site and an area of the Dodder\_050 surface watercourse at the north of the site on 19/05/2025. During this survey, no protected Flora were recorded.

#### 3.5 Protected Species from NBDC Database

A 2km radius custom polygon was created through NBDC Biodiversity Maps (NBDC, 2025) in order to assess which Natura 2000 QI/SCI species were recorded in close proximity to the site within the last ten years. Seven SCI species were identified within the 2km custom polygon, Black-headed Gull *Larus ridibundus*, Brent Goose *Branta bernicla*, Common Gill *Larus canus*, Eurasian Curlew *Numenius Arquata*, Eurasian Oystercatcher *Haematopus pstralegus*, Great Black-backed Gull *Larus marinus* and Herring Gull *Larus argentatus*.

The SCI species found within the custom polygon are listed below in Table 3-2 and whether they are listed within the EU Birds directive or are listed on the Birds of Conservation Concern Ireland (BoCCI) Red or Amber List (2020-2026) (Gilbert et al., 2021). For a full table, see Appendix C.1. Additionally non-QI/SCI protected mammal species recorded within the NBDC records, such as Badger *Meles meles* and European Otter *Lutra lutra*, are noted (see Appendix



B- Ecological Note). As Badger and Otter are not QI species of any of the Natura 2000 sites connected to the proposed site, they cannot be considered further within the assessment).

Table 3-2: SCI bird species found within custom polygon in the desktop study

Bird Species	EU Birds Directive	BoCCI List (2020-2026)
Black-headed Gull	-	Amber
Larus ridibundus		
Brent Goose	-	Amber
Branta bernicla		
Common Gull	-	Amber
Larus canus		
Eurasian Curlew	Annex II	Red
Numenius Arquata		
Eurasian Oystercatcher	-	Amber
Haematopus pstralegus		
Great Black-backed Gull	-	Green
Larus marinus		
Herring Gull	Annex II	Amber
Larus argentatus		

#### 3.5.1 Brent Goose and other wintering birds

Amenity grassland habitats within parks are commonly used as ex-situ foraging and roosting habitat by a number of wintering bird species, namely Brent Goose, Black-headed Gull, and Eurasian Oystercatcher. The site currently does not have baseline information on its use by wintering birds. However, GPS data collected by PhD researcher Tess Handby (University of Exeter) (Handby, 2022), who has monitored Brent Goose populations in the Dublin area between 2018 and 2020, indicates the site is located within 300m of the home range (95% kernel density estimation [KDE]) of the Sandymount Strand Brent Goose population (Figure 3-3). 50% KDE represents roosting areas.



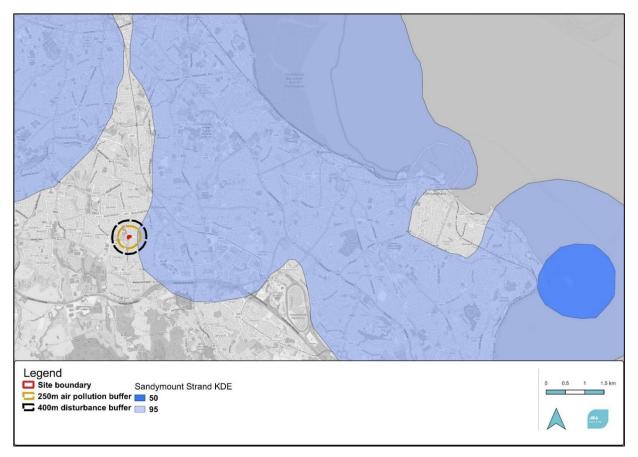


Figure 3-3: Kernal Density Estimates (KDE) for home range of the Sandymount Strand Brent Goose population. The 95% KDE highlights range, while the 50% represents roosting areas (©OSM, 2025, Handby, 2022)

#### 3.6 Invasive Species

Certain invasive non-native flora and fauna are listed under the First Schedule of the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374/2024) and the Commission Implementing Regulation (EU) 2025/1422 update. This makes it an offence to release, plant them in the wild or cause them to disperse, spread or otherwise cause them to grow. If these species occur on a site proposed for development or other work which may disturb the ground, control of these species is likely to be required.

European Council's Regulation on the prevention and management of the introduction and spread of invasive alien species [2025/1422] sets out to prevent, minimise and mitigate the adverse impacts of the introduction and spread, both intentional and unintentional, of invasive alien species on biodiversity and the related ecosystem services as well as on human health and the economy.

While no site visit was carried out for this project, a site visit to an adjacent area of Meadowbrook Park was carried out on 19/05/2025 by JBA for a separate project. An area along the site's northern boundary where a tributary of the Dodder River is present was surveyed. Within this area, two invasive non-native species (INNS) were recorded, Grey Squirrel, and Sycamore. The invasive species Butterfly-bush *Buddleja davidii* was also identified to the south of the football pitches within Meadowbrook Park, within 30m of the proposed site. Grey Squirrel is listed on



the First Schedule of S.I. No. 374/2024 - European Union (Invasive Alien Species) Regulations 2024.

Table 3-3 below provides a list of INNS recorded within 2km of the site (NBDC, 2025) that are listed on the First Schedule of the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374/2024; 2025/1422), and their approximate distance from the site. For a full list of INNS recorded within 2km of the site, see C.2.

Table 3-3: INNS recorded within 2km radius to the site of the proposed works

INNS	Impact	Regulation S.I. 374/2024, 2025/1422
Butterfly-bush Buddleja davidii	Medium	No
Cherry Laurel Prunus laurocerasus	High	No
Common Toad Bufo bufo	Medium	No
Eastern Grey Squirrel Sciurus carolinensis	High	Yes
Evergreen Oak  Quercus ilex	Medium	No
Fallow Deer Dama dama	High	Yes
Giant Hogweed  Heracleum mantegazzianum	High	Yes
Harlequin Ladybird Harmonia axyridis	High	Yes
Himalayan Honeysuckle Leycesteria formosa	Medium	No
Japanese Knotweed Fallopia japonica	High	Yes
New Zealand Flatworm Arthurdendyus triangulatus	High	No
Sycamore Acer pseudoplatanus	Medium	No
Three-cornered Garlic  Allium triquetrum	Medium	Yes
Zebra Mussel Dreissena (Dreissena) polymorpha	High	Yes

#### 3.7 Local Waterbodies in the Vicinity of the Site

#### 3.7.1 Surface Water

The proposed development is located within the WFD sub catchment Dodder\_SC\_010, within the WFD Liffey and Dublin Bay Catchment. There is a tributary of the River Dodder, the Dooder\_050 surface watercourse, located within 6m of the north of the site. There is a culverted section of this surface watercourse to the northwest of the site which flows under Meadowbrook Park. The Dodder\_050 flows directly into the WFD Liffey Estuary Lower transitional waterbody, which drains into the WFD Dublin Bay coastal waterbody. As such the site has an indirect hydrological connection to both these WFD waterbodies. The Brewery Stream\_010 surface watercourses is located 3.7km to the east of the site and drains directly into the Dublin Bay



Coastal waterbody. Table 3-4 and Figure 3-4 show the surface waterbodies within the vicinity of the site and their respective WFD status (2016-2021) and risk status (EPA, 2025).

Table 3-4: The WFD waterbodies within Zol of the proposed works

WFD Waterbody	WFD Status (2016-2021)	Risk Status
Brewery Stream_010	Poor	Review
Dodder_050	Moderate	At risk
Dublin Bay	Good	Not at risk
Liffey Estuary Lower	At risk	Moderate

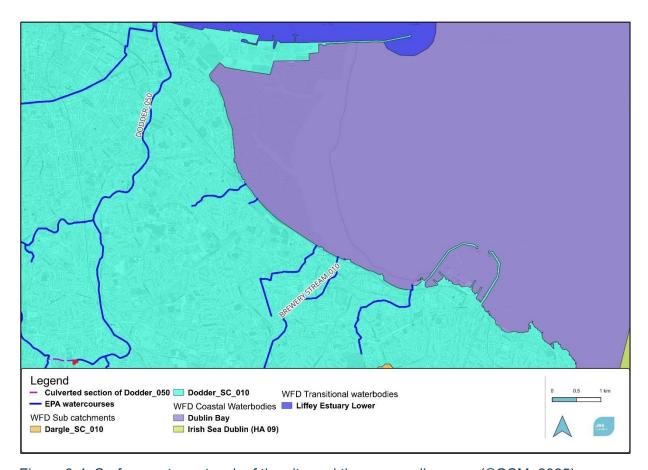


Figure 3-4: Surface water network of the site and the surrounding area (©OSM, 2025)

#### 3.7.2 Groundwater Bodies

The site is located in its entirety within the WFD Kilcullen groundwater body (Figure 3-5). This groundwater body currently has 'Good' WFD status (2016-2021), and its risk status is 'At risk'. The geology underlying the site is dominated by pale grey fine to coarse-grained granite (GSI, 2025). The site's underlying aquifer vulnerability is 'Moderate'.

The aquifer underlying the site is a poor aquifer, with bedrock which is generally unproductive except for in local zones. This aquifer has a very limited and relatively poorly connected network



of fractures, fissures and joints, giving a low fissure permeability which tends to decrease further with depth. A shallow zone of higher permeability may exist within the top few metres of more fractured/weathered rock, and higher permeability may also occur along fault zones. These zones may be able to provide larger 'locally important' supplies of water. In general, the lack of connection between the limited fissures results in relatively poor aquifer storage and flow paths that may only extend a few hundred metres. Due to the low permeability and poor storage capacity, the aquifer has a low 'recharge acceptance'. Some recharge in the upper, more fractured/weathered zone is likely to flow along the relatively short flow paths and rapidly discharge to streams, small springs and seeps. Groundwater discharge to streams ('baseflow') can significantly decrease in the drier summer months. The site's subsoil permeability is low.

In the context of the site, this means that surface water is slow to percolate into the groundwater body, which then has a limited flow path and is likely to discharge to local waters, in this case that being the Dodder\_050 which is located within 6m of the site's northern boundary. Any groundwater discharge would likely flow directly into this watercourse to the north of the site. This watercourse flows directly into the Liffey Estuary transitional waterbody and Dublin Bay coastal waterbody. As such a weak surface-ground-surface water connection exists between the site and the Liffey Estuary transitional waterbody and Dublin Bay coastal waterbody.

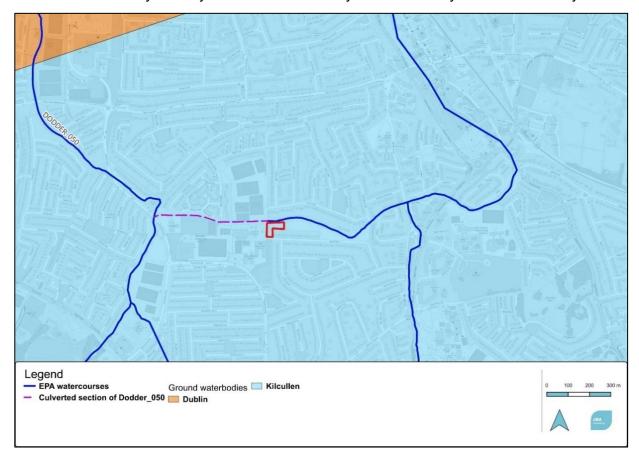


Figure 3-5: Groundwater body underlying the proposed site and surrounding area (©OSM, 2025)

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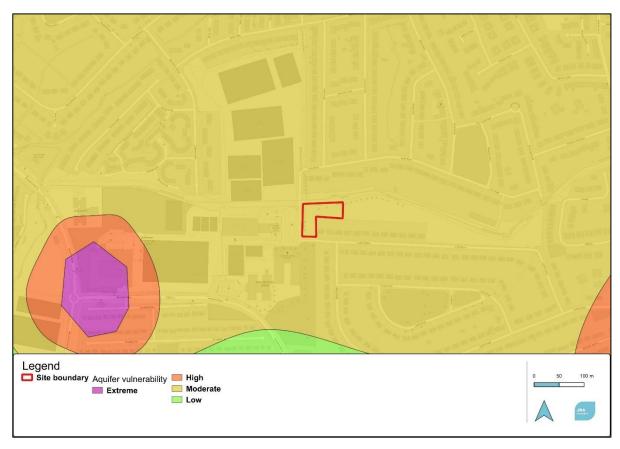


Figure 3-6: Groundwater vulnerability of the proposed site (©OSM, 2025)



### 4 Natura 2000 Sites

The OPR guidance is to use a Source-Pathway-Receptors model, therefore only directly connected sites will be retained (OPR, 2021). Taking this model into consideration, there are a total of five Natura 2000 sites that have been identified as being present within the Zol. These European Natura 2000 sites are shown in Table 4-1 and mapped in Figure 4-1 below. The Natura 2000 site descriptions, QIs/ SCIs, and respective project-relevant threats/pressures for the sites are provided in Table 4-2.

Table 4-1: Natura 2000 sites within the proposed project's Zol

Natura 2000 site	Site Code	Approximate distance from site	Hydrological distance from site
North Dublin Bay SAC	000206	9.8km	14.2km indirect connection via surface water pathways
North Bull Island SPA	004006	9.8km	14.2km indirect connection via surface water pathways
North-west Irish Sea SPA	004236	9.8km	14.7km indirect connection via surface water pathways
South Dublin Bay and River Tolka Estuary SPA	004024	4.8km	11.9km indirect connection via surface water pathways
South Dublin Bay SAC	000210	4.9km	16.3km indirect connection via surface water pathways



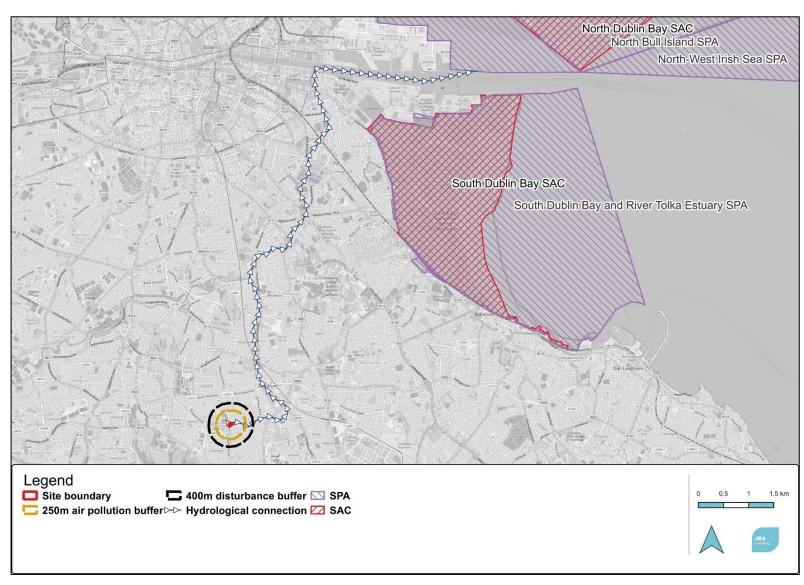


Figure 4-1: Natura 2000 sites in respect to the proposed site and its ZoI (©OSM, 2025)



Table 4-2: Site briefs; QIs / SCIs; and project-relevant threats /pressures to the Natura 2000 sites within the ZoI

Site Name	Brief	Qualifying Interests / Special Conservation Interests	Project-relevant Threats / Pressures: Impact (Source)
South Dublin Bay and River Tolka Estuary SPA	This designated site comprises a substantial part of Dublin Bay. It includes virtually all of the intertidal area in the south bay, as well as much of the Tolka Estuary to the north of the River Liffey. The sands support the largest stand of Dwarf Eelgrass on the east coast of Ireland. Sediments in the Tolka Estuary vary from soft thixotropic muds with a high organic content in the inner estuary to exposed, well aerated sands off the Bull Wall. The site regularly has an internationally important population of Brent Geese, which feeds on Dwarf Eelgrass in the autumn. It has nationally important numbers of a further 6 species including: Oystercatcher, Ringed Plover, Red Knot, Sanderling, Dunlin and Bar-tailed Godwit. It is an important site for wintering gulls, especially Black-headed Gull and Common Gull. Is a regular autumn roosting ground for significant numbers of terns, including Roseate Terns, Common Tern and Artic Tern (NPWS, 2015a).	- Light-bellied Brent Goose Branta bernicla hrota [A046]  - Eurasian Oystercatcher Haematopus ostralegus [A130]  - Ringed Plover Charadrius hiaticula [A137]  - Grey Plover Pluvialis squatarola [A141]  - Red Knot Calidris canutus [A143]  - Sanderling Calidris alba [A144]  - Dunlin Calidris alpina [A149]  - Bar-tailed Godwit Limosa lapponica [A157]  - Common Redshank Tringa totanus [A162]  - Black-headed Gull Chroicocephalus ridibundus [A179]  - Roseate Tern Sterna dougallii [A192]  - Common Tern Sterna hirundo [A193]  - Arctic Tern Sterna paradisaea [A194]  - Wetland and Waterbirds [A999]	Urbanised areas, human habitation: High impact (Outside)  Road, motorways: Medium impact (Outside)  Industrial or commercial areas: High Impact (Outside)  (EEA, 2021)



Site Name	Brief	Qualifying Interests / Special Conservation Interests	Project-relevant Threats / Pressures: Impact (Source)
North Dublin Bay SAC	The North Bull Island sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port during the 18th and 19th centuries. The seaward side of the island has a fine sandy beach. A substantial area of shallow marine water is included in the site. The interior of the island is excluded from the site as it has been converted to golf courses. Nature conservation is a main land use within the site. The North Bull Island dune system is one of the most important systems on the east coast and is one of the few in Ireland that is actively accreting. It possesses extensive and mostly good quality examples of embryonic, shifting marram and fixed dunes, as well as excellent examples of humid dune slacks. Both Atlantic and Mediterranean salt marshes are well represented, and a particularly good marsh zonation is shown. The salt marshes grade into mudflats and sandflats, some of which are dominated by annual Salicornia species. Petalwort Petalophyllum ralfsii occurs at its only known station away from the western seaboard (NPWS, 2013a).	- Mudflats and sandflats not covered by seawater at low tide [1140] - Annual vegetation of drift lines [1210] - Salicornia and other annuals colonising mud and sand [1310] - Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] - Mediterranean salt meadows (Juncetalia maritimi) [1410] - Embryonic shifting dunes [2110] - Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] - Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] - Humid dune slacks [2190] - Petalwort Petalophyllum ralfsii [1395]  (NPWS, 2013b)	Urbanised areas, human habitation: High impact (outside) Industrial or commercial areas: High impact (outside)  (EEA, 2020a)
North Bull Island SPA	The North Bull Island sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port. The site is among the top ten sites for wintering waterfowl	<ul> <li>- Light-bellied Brent Goose Branta bernicla hrota [A046]</li> <li>- Common Shelduck Tadorna tadorna [A048]</li> <li>- Eurasian Teal Anas crecca [A052]</li> </ul>	Roads, motorways:  Moderate Impact (outside)

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Site Name	Brief	Qualifying Interests / Special Conservation Interests	Project-relevant Threats / Pressures: Impact (Source)
	in the country. It supports internationally important populations of Brent Goose and Bartailed Godwit and is the top site in the country for both of these species. A further 14 species have populations of national importance, with particular notable numbers of Shelduck, Pintail, Grey Plover, and Red Knot. The SPA is a regular site for passage waders such as Ruff, Curlew Sandpiper and Spotted Redshank. The site supports Short-eared Owl in winter (NPWS, 2014).	<ul> <li>Northern Pintail Anas acuta [A054]</li> <li>Northern Shoveler Anas clypeata [A056]</li> <li>Eurasian Oystercatcher Haematopus ostralegus [A130]</li> <li>European Golden Plover Pluvialis apricaria [A140]</li> <li>Grey Plover Pluvialis squatarola [A141]</li> <li>Red Knot Calidris canutus [A143]</li> <li>Sanderling Calidris alba [A144]</li> <li>Dunlin Calidris alpina [A149]</li> <li>Black-tailed Godwit Limosa limosa [A156]</li> <li>Bar-tailed Godwit Limosa lapponica [A157]</li> <li>Eurasian Curlew Numenius arquata [A160]</li> <li>Common Redshank Tringa totanus [A162]</li> <li>Ruddy Turnstone Arenaria interpres [A169]</li> <li>Black-headed Gull Chroicocephalus ridibundus [A179]</li> <li>Wetland and Waterbirds [A999]</li> </ul>	Continuous urbanisation: Medium impact (outside)  Industrial or commercial areas: Medium impact (outside)  Discharges: Medium impact (outside)  (EEA, 2020b)



Site Name	Brief	Qualifying Interests / Special Conservation Interests	Project-relevant Threats / Pressures: Impact (Source)
South Dublin Bay SAC	This intertidal site extends from the South Wall at Dublin Port to the West Pier at Dun Laoghaire, a distance of c. 5 km. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. A number of small streams and drains flow into the site. The designated site possesses a fine and fairly extensive example of intertidal flats. Sediment type is predominantly sand, with muddy sands in the more sheltered areas. A typical macroinvertebrate faunal assemblage exists within the SAC. The SAC has the largest stand of Dwarf Eelgrass <i>Zostera nolti</i> on the east coast (NPWS, 2020d).	- 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]  (NPWS, 2013c)	Urbanised areas, human habitation: High impact (outside)  Industrial or commercial areas: High impact (outside)  Roads, motorways Low impact (outside)  Discharges: Medium impact (both)  Marine water pollution: Medium impact (both)
North-West Irish Sea SPA	The North-west Irish Sea cSPA constitutes an important resource for marine birds. The estuaries and bays that open into it along with connecting coastal stretches of intertidal and shallow subtidal habitats, provide safe feeding and roosting habitats for waterbirds	- Common Scoter <i>Melanitta nigra</i> [A065] - Red-throated Diver <i>Gavia stellata</i> [A001] - Great Northern Diver <i>Gavia immer</i> [A003] - Fulmar <i>Fulmarus glacialis</i> [A009] - Manx Shearwater <i>Puffinus puffinus</i> [A013]	Not currently listed given the sites newly granted SPA status.



Site Name	Brief	Qualifying Interests / Special Conservation Interests	Project-relevant Threats / Pressures: Impact (Source)
	throughout the winter and migration periods. These areas, along with more pelagic marine waters further offshore, provide additional supporting habitats (for foraging and other maintenance behaviours) for those seabirds that breed at colonies on the north-west Irish Sea's islands and coastal headlands. These marine areas are also important for seabirds outside the breeding period. This SPA extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km2 in area. This SPA is ecologically connected to several existing SPAs in this area. (NPWS, 2023a)	- Shag Phalacrocorax aristotelis [A018] - Cormorant Phalacrocorax carbo [A017] - Little Gull Larus minutus [A177] - Kittiwake Rissa tridactyla [A188] - Black-headed Gull Chroicocephalus ridibundus [A179] - Common Gull Larus canus [A182] - Lesser Black-backed Gull Larus fuscus [A183] - Herring Gull Larus argentatus [A184] - Great Black-backed Gull Larus marinus [A187] - Little Tern Sterna albifrons [A195] - Roseate Tern Sterna dougallii [A192] - Common Tern Sterna hirundo [A193] - Arctic Tern Sterna paradisaea [A194] - Puffin Fratercula arctica [A204] - Razorbill Alca torda [A200] - Guillemot Uria aalge [A199]	



### 5 Other Relevant Plans and Projects

#### 5.1 Cumulative Effects

As part of the Screening for an Appropriate Assessment, in addition to the proposed works, other relevant plans and projects in the region that may induce cumulative impacts must be considered at this stage. These are listed in sub-sections below and are assessed with the proposed project in the Screening Assessment.

#### 5.2 Plans

The following projects or plans were identified as potential sources of in-combination effects:

- DLRCC Development Plan 2022 2028;
- Dublin City Development Plan 2022 2028;
- Greater Dublin Drainage Strategy 2005;
- Transport Strategy for Greater Dublin Area 2022-2042;
- Third Cycle River Basin Management Plan for Ireland 2022-2027; and
- Planning Applications (retrieved from Data.gov.ie Planning Application Sites).

#### 5.2.1 DLRCC Development Plan 2022 – 2028

The County Development Plan (DLRCC, 2022a) has a vision and policy statement that aims to continue to facilitate appropriate levels of sustainable development predicated on the delivery of high quality community, employment and recreational environments - allied to the promotion of sustainable transportation and travel patterns - all the while protecting Dún Laoghaire—Rathdown's unique landscape, natural heritage and physical fabric, to ensure the needs of those living and working in the County can thrive in a socially, economically, environmentally sustainable and equitable manner.

An Appropriate Assessment Screening and an Appropriate Assessment Natura Impact Statement (NIS) was carried out on the plan. This concluded that there are no likely significant direct, indirect or secondary impacts of the project on any Natura 2000 sites (DLRCC, 2022b).

Overall, the Dún Laoghaire Rathdown Council Development Plan 2022-2028 is not considered to adversely impact any Natura 2000 site, nor is it expected to contribute to any cumulative or in-combination effects.

# 5.2.2 Dublin City Development Plan 2022 – 2028 - Natura Impact Report Conclusion (Scott Cawley, 2022)

It has been objectively concluded in the Dublin City Development NIR (Scott Cawley, 2022), following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts associated with the Plan, and the implementation of mitigatory measures identified in Section 8 of the NIR (and included as objectives and policies of the Plan), that the Plan will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. Furthermore,



Dublin City Council, as the competent authority, determined that the Plan would not adversely affect (either directly or in directly) the integrity of any European site, either alone or in combination with other plans of projects.

The Dublin City Development Plan 2022 – 2028 is not anticipated to contribute to cumulative or in-combination effects in respect to the proposed works.

#### 5.2.3 Greater Dublin Drainage Strategy 2005;

The Greater Dublin Drainage Strategy 2005 sets out the strategic planning for the development of wastewater treatment in the Greater Dublin area in relation to the Ringsend WWTP Upgrade, Greater Dublin Drainage Project and associated wastewater network drainage projects (Irish Water, 2024). The Ringsend WWTP Upgrade includes plans to expand the WWTP to its ultimate capacity, together with associated network upgrades required. The Greater Dublin Drainage Project is planned to relieve both the Ringsend WWTP and network loading by construction of a new WWTP at Clonshaugh, an orbital sewer and provision of an outfall pipe discharging 1km northeast of Ireland's Eye.

The Ringsend WWTP upgrade is in progress and carried out in stages, with an increased capacity of 400,000 PE by Q1 2021 and the ultimate capacity of 2.4 million PE to be in operation by 2025 (Irish Water, 2014).

The Greater Dublin Drainage Project is strategically important to the Dublin Region in that it will provide capacity for residential and commercial growth (Irish Water, 2025).

The Greater Dublin Drainage Strategy is not anticipated to contribute to cumulative or in-combination effects in respect to the proposed works.

## 5.2.4 Transport Strategy for Greater Dublin Area 2022-2042 - Natura Impact Statement (CAAS, 2021)

A Stage 2 Appropriate Assessment of the Transport Strategy for the Greater Dublin Area has identified that the implementation of the Strategy has the potential to result in effects to the integrity of 66 Natura 2000 sites, if unmitigated.

The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the Natura 2000 sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Strategy will be subject to the Appropriate Assessment process when further details of design and location are known.

In-combination effects from interactions with other plans and projects were considered in the assessment and the mitigation measures incorporated into the Strategy are seen to be suitably robust to ensure there will be no significant adverse effects as a result of the implementation of the Strategy either alone or in-combination with other plans/projects.



#### 5.2.5 River Basin Management Plan for Ireland 2022-2027

Ireland's third River Basin Management Plan for Ireland - 'Water Action Plan 2024: A River Basin Management Plan' (DHLGH, 2024) sets out the measures that are necessary to protect and restore water quality in Ireland. The overall aim of the plan is to ensure that our natural waters are sustainably managed and that freshwater resources are protected so as to maintain and improve Ireland's water environment. The 3<sup>rd</sup> cycle Catchment Reports were published in 2024. The Catchment Reports provide a summary of the water quality assessment outcomes for respective catchments, including status and risk categories, significant threats and pressures, details on protected areas and a comparison between cycle 2 and cycle 3.

The 3<sup>rd</sup> cycle Catchment Report for Liffey and Dublin Bay Catchment (EPA, 2024) indicates that 42% of surface waterbodies were at 'good' or 'high' ecological status, and 86% of groundwater bodies were at 'good' status. The overall change in quality between Cycles 2 and 3 include 2 are mixed. There has been neither an increase or decrease in the number of rive waterbodies valued at "Poor" or "Bad" status, remaining at 18% between cycles. There is an increase of river waterbodies reaching a "High" status from 9% to 10%, there was also a decrease in waterbodies from "Good" to "Moderate" value by approximately 3% of river waterbodies (as seen in Figure 5-1). The main significant pressures are aquaculture, anthropogenic, atmospheric, historically polluted sites and waste pressures followed by agriculture, urban run-off and forestry.

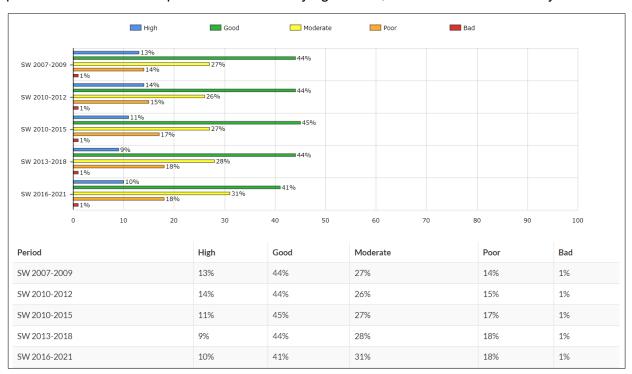


Figure 5-1: Changes in quality of river waterbodies in the Liffey and Dublin Bay catchment since 2007 (EPA, 2024)

The River Basin Management Plan for Ireland 2022-2027 is not anticipated to contribute to cumulative or in-combination effects in respect to the proposed works.



#### 5.3 Other Planning Applications

A search of planning applications that have been made in the last three years and within 2km of the proposed project was carried out. Applications for home extensions, internal alterations and retentions are not considered. The projects that could have in-combination effects with the proposed development are listed in Table 5-1 overleaf.

The DLRCC Development Plan, Dublin City Development Plan, Greater Dublin Drainage Strategy, Transport Strategy for Greater Dublin Area, River Basin Management Plan, and other local projects are considered in combination with the currently proposed project in the Screening Assessment Section 6.6.3 below.



Table 5-1: Projects granted planning permission vicinity of proposed site

Planning Reference	Address	Application Status	Decision Date	Summary of Development
ABP31317622	Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14	Approved (Permission with conditions)	25/05/2023	10 year permission for a Strategic Housing Development, with a total application site area of c.9.6 ha, on lands at the Central Mental Hospital, Dundrum Road, Dundrum, Dublin The subject site is in the immediate setting and curtilage of a number of proposed protected structures, namely the 'Asylum' (RPS No. 2072), the 'Catholic Chapel' (RPS No. 2071) and the 'Hospital Building' (RPS No. 2073). The development will consist of the demolition of existing structures associated with the existing use (3,736 sq m), including: Single storey former swimming pool / sports hall and admissions unit (2,750 sq m); Two storey redbrick building (305 sq m); Single storey ancillary and temporary structures including portacabins (677 sq m); Removal of existing internal subdivisions/ fencing, including removal of security fence at Dundrum Road entrance; Demolition of section of porch and glazed screens at Gate Lodge building (4 sq m); Removal of walls adjacent to Main Hospital Building; Alterations and removal of section of wall to Walled Garden. The development will also consist of alterations and partial demolition of the perimeter wall, including: Alterations and removal of section of perimeter wall adjacent to Rosemount Green (south); Formation of a new opening in perimeter wall at Annaville Grove to provide a pedestrian and cyclist access; Alterations and removal of section, widening of existing vehicular access, provision of a new vehicular, cyclist and pedestrian access; Alterations and removal of section of perimeter wall adjacent to Mulvey Park to provide a pedestrian and cyclist access. The development with a total gross floor area of c. 106,770 sq m (c. 106,692 sq m excluding retained existing buildings), will consist of 977 no. residential units comprising: 940 no. apartments (consisting of 53 no. studio units; 423 no. one bedroom units; 37 no. two bedroom (3 person) units; 317 no. two bedroom (4 person) units; and 110 no. three bedroom units) arranged in 9 blocks (Blocks 02-10) ranging between 2 and 6 storeys in heigh



Planning Reference	Address	Application Status	Decision Date	Summary of Development
				courtyards and roof gardens) and ancillary residential facilities; 17 no. duplex apartments (consisting of 3 no. two bedroom units and 14 no. three bedrooms units located at Blocks 02, 08 and 09), together with private balconies and terraces. 20 no. two and three storey houses (consisting of 7 no. three bedroom units and 13 no. four bedroom units) and private rear gardens located at Blocks 02, 08 and 09). The development will also consist of 3,889 sq m of non-residential uses, comprising: Change of use and renovation of existing single storey Gate Lodge building (reception/staff area) to provide a café unit (78 sq m); 1 no restaurant unit (307 sq m) located at ground floor level at Blocks 03 and 07; 1 no. medical units (245 sq m) located at ground floor level at Block 02; A new childcare facility (463 sq m) and associated outdoor play area located at ground floor level at Block 02; A new childcare facility (463 sq m) and associated outdoor play area located at ground floor level at Block 10; and A new community centre facility, including a multi-purpose hall, changing rooms, meeting rooms, storage and associated facilities (1,684 sq m) located at ground and first floor level at Block 06. Vehicular access to the site will be from the existing access off Dundrum Road, as revised, and from a new access also off Dundrum Road to the south of the existing access. The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, wetland feature, part-basement, car parking (547 no. spaces in total, including car sharing and accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections (including connection into existing surface water sewer in St. Columbanus Road); ducting; plant (including external plant for district heati



Planning Reference	Address	Application Status	Decision Date	Summary of Development
				contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000, as amended, notwithstanding that the proposed development materially contravenes the Dún Laoghaire Rathdown County Development Plan 2016-2022 and the Dún Laoghaire Rathdown Development Plan 2022-2028 other than in relation to the zoning of the land. An Environmental Impact Assessment Report and Natura Impact Statement have been prepared in respect of the proposed development. The application, together with the Environmental Impact Assessment Report and Natura Impact Statement, may be inspected, or purchased, at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dun Laoghaire-Rathdown County Council. The application may also be inspected online at the following website set up by the Applicant: - www.dundrumcentralresidential.ie



## 6 Screening Assessment

#### 6.1 Introduction

This screening exercise will focus on assessing the likely adverse effects of the project on the Natura 2000 site identified in Section 4 above.

This section identifies the potential likely significant effects which may arise as result of the proposed project. It then goes on to identify how these impacts could potentially impact on the Natura 2000 sites. The significance of likely effects is also assessed, with any potential incombination effects also identified.

The Natura 2000 sites to be assessed are:

- North Dublin Bay SAC 000206
- North Bull Island SPA 004006
- North-west Irish Sea SPA 004236
- South Dublin Bay and River Tolka Estuary SPA 004024
- South Dublin Bay SAC 000210

#### 6.2 Assessment Criteria

6.2.1 Description of the individual elements of the project (either alone or in combination with other plans or project) likely to give rise to impacts on the Natura 2000 sites

Adverse impacts that have the potential to cause a significant effect on the QIs / SCIs of the Natura 2000 sites, during the construction and operational phases of the project, will negatively impact the sites via the surface water pathways, groundwater pathways, land and air pathways. Surface water pathways can impact on surface water quality and surface water dependent habitats and species. Groundwater pathways can impact on groundwater quality and quality of groundwater dependent habitats and species. Land and air pathways can impact by direct physical disturbance and dust or other air-based emissions.

The proposed project is not anticipated to have likely significant effects on the QIs / SCIs of any Natura 2000 site. The rationale for excluding specific impacts via the main pathways is given in more detail in the following sub-sections.

#### 6.2.2 Surface Water Pathways

#### 6.2.2.1 Construction Phase

The proposed development is located within the sub catchment Dodder\_SC\_010, within the Liffey and Dublin Bay Catchment. The site shares its sub catchment with two of the Natura 2000 sites within Zol, South Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA. The site does not share its sub catchment with the North Bull Island SPA or North Dublin Bay SAC, nor the North-west Irish Sea SPA which is entirely marine based.



There is a section of the Dodder\_050 surface watercourse, a tributary of the River Dodder, which flows within 6m of the site's northern boundary. This watercourse flows directly into the Liffey Estuary Lower transitional waterbody, which drains into the Dublin Bay coastal waterbody. These waterbodies are directly hydrologically linked to the five Natura 2000 sites within Zol, North Bull Island SPA, North Dublin Bay SAC, North-west Irish Sea SPA, South Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA. As such the site has an indirect hydrological connection to these Natura 2000 sites via the Dodder 050 surface watercourse.

In order for any surface water pollutants generated during the construction phase to enter the Dodder\_050 they would have to first traverse approximately 6m of grassy verge habitat. In the event pollutants traverse this distance, they would have to travel a further 8.9km within the Dodder\_050 watercourse to reach the Liffey Estuary Lower transitional waterbody, during which time they will undergo a notable degree of dilution and retention, reducing them to non-deleterious levels. Pollutants would have to travel a further 3km within the Liffey Estuary Lower transitional waterbody to reach the nearest Natura 2000 site, South Dublin Bay and River Tolka Estuary SPA. Furthermore, while potential hydrocarbon pollutants will be present on-site during the construction phase, given the small-scale of the project it is unlikely significant volumes of these pollutants will be generated on-site, further decreasingly the likelihood of these pollutants navigating their way into downstream Natura 2000 sites.

#### 6.2.2.2 Operational Phase

The proposed project will not generate any surface water of note. Rainwater landing on the play equipment is expected to percolate into the ground locally.

Therefore, likely significant effects via surface water pathways during the construction and operational phases are not anticipated for the five Natura 2000 sites within the Zol due to scale of the project and the hydrological pathway distances between the proposed site and the Natura 2000 sites.

#### 6.2.3 Groundwater

#### 6.2.3.1 Construction Phase

The site is located in its entirety within the WFD Kilcullen groundwater body. The site shares this groundwater body with South Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA. The site does not share its groundwater body with the North Bull Island SPA or North Dublin Bay SAC, nor the North-west Irish Sea SPA which is entirely marine based.

The aquifer underlying the site and the surrounding area has 'Moderate' vulnerability. The aquifer underlying the site is a poor aquifer, with bedrock which is generally unproductive except for in local zones. This aquifer has a very limited and relatively poorly connected network of fractures, fissures and joints, giving a low fissure permeability which tends to decrease further with depth. A shallow zone of higher permeability may exist within the top few metres of more fractured/weathered rock, and higher permeability may also occur along fault zones. These zones may be able to provide larger 'locally important' supplies of water. In general, the lack of connection between the limited fissures results in relatively poor aquifer storage and flow paths that may only extend a few hundred metres. Due to the low permeability and poor storage capacity, the aquifer has a low 'recharge acceptance'. Some recharge in the upper, more



fractured/weathered zone is likely to flow along the relatively short flow paths and rapidly discharge to streams, small springs and seeps. Groundwater discharge to streams ('baseflow') can significantly decrease in the drier summer months. The site's subsoil permeability is low.

Given the aquifer's surface water recharge characteristics, a surface-ground-surface water connection exists between the proposed site and the Dodder\_050 located 6m to the north of the site. Any groundwater discharge from the site would likely enter directly into the Dodder\_050. Similar to the indirect surface water pathway, the indirect surface-ground-to-surface water pathway to the Natura 2000 sites, North Bull Island SPA, North Dublin Bay SAC, North-west Irish Sea SPA, South Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA, via the Dodder\_050 provides both dilution and retention elements that will negate the negative impacts of pollutants accidentally introduced into the groundwater table / aquifer.

Therefore, given the small-scale of the project, and the hydrological distances between the site and the Natura 2000 sites, adverse impacts via the groundwater and ground-tosurface water pathways are not anticipated during the construction phase.

#### 6.2.3.2 Operational Phase

The operational nature of the proposed project will not generate any potential groundwater pollutants; therefore, negative impacts are not anticipated during the operational phase.

Therefore, given the small scale of the project, and hydrological distances between the site and the Natura 2000 sites, likely significant impacts via the groundwater and ground-to-surface water pathways to the Natura 2000 sites are not anticipated during the construction and operational phases.

#### 6.2.4 Land Impact Pathways

The loss or degradation of supporting habitats within and outside the identified Natura 2000 sites via direct land-based impacts (e.g., physical habitat disturbance and/or loss) could have potential adverse impacts on a number of the QIs/SCIs associated with these Natura 2000 sites.

Large amenity grassland areas within parks, such as grass pitches, are commonly used as exsitu foraging habitat by a number of QI/SCI wintering bird species, namely Brent Goose, Blackheaded Gull, and Eurasian Oystercatcher which are SCIs of the South Dublin Bay and River Tolka Estuary SPA and North Bull Island SPA. These species have all been previously recorded within 2km of the site within the last 10 years. The site is located within 250m of the home range (95% kernel density estimation [KDE]) of the Sandymount Strand Brent Goose population. While the amenity grassland habitat present on site will be lost during the construction phase, given its small size and the constricted area between treelines, fencing and pathways, it is unlikely to support the foraging activity of SCI wintering bird species which prefer open areas of parkland, undisturbed by people and dogs walking by. SCI wintering bird species are likely to forage within the grass pitches in Meadowbrook Park to the northwest of the site, which will not be disrupted by the proposed works.

Therefore, likely significant effects via land impact are not anticipated during the construction and operational phases of the proposed project.



#### 6.2.5 Air Impact Pathways

The disturbance or environmental degradation of supporting habitats outside the identified Natura 2000 sites via air pollution impacts could have potential significant effects on a number of the QIs associated with these Natura 2000 sites.

#### 6.2.5.1 Visual and Audible Disturbance (QI /SCI Species)

The disturbance of supporting habitats outside the identified Natura 2000 sites has potential to cause significant adverse effects on a number of the QIs/SCIs associated with these Natura 2000 sites. The grass pitches within Meadowbrook Park to the northwest of the site may be used as ex-situ foraging habitat by Brent Goose and Eurasian Oystercatcher, both of which have been previously recorded within 2km of the site within the last 10 years. These pitches are within a 300m buffer of the proposed site. However, given the scale and scope of the proposed works, significant visual and audible disturbance is not anticipated on any SCI bird species foraging within the grass pitches within Meadowbrook Park.

While Black-headed Gull, Common Gull, Great Black-backed Gull and Herring Gull, which are SCI species of the North-west Irish Sea SPA have been previously recorded within 2km of the site within the last 10 years, these species are resilient to urban noise disturbance and will likely not be impacted by the proposed works.

Therefore, during the construction phases of the proposed project, likely significant effects via the air (disturbance) impact pathway are not anticipated for the QI / SCI of the Natura 2000 sites.

Given the operational nature of the proposed project, likely significant effects via the air pathway (disturbance) are not anticipated during the operational phase.

#### 6.2.5.2 Air Pollution (Emissions and Dust)

The Zol for the air quality impact assessment will include all sensitive ecological receptors (QIs and supporting habitats) within a distance of 250m of the proposed project during the construction phase.

#### Air (Chemical emissions)

Vehicle emissions can potentially impact the QIs/SCIs of the Natura 2000 sites within the ZoI. There will be a small increase in local traffic attending the site of the proposed development during construction, resulting in an increase in local NOx emissions, however, vehicular emissions are not anticipated to significantly impact the Natura 2000 sites due to the distance between proposed development and Natura 2000 sites during sites construction and operational phases.

#### Air (Dust settlement)

Dust particles can be classified into those that are easily deposited and those that remain suspended in the air for extended periods. This division is useful as deposited dust is usually the coarse fraction of particulates that causes dust annoyance, whereas suspended particulate matter is implicated more in exposure impacts. Airborne particles have a broad range of diameters, from nano-particles and ultrafine particles (diameters less than 0.1 microns (µm) to the very large particles with diameters up towards 100µm. There is no clear dividing line



between the sizes of suspended particulates and deposited particulates, although particles with diameters >50µm tend to be deposited quickly and particles of diameter <10 µm (PM10) have an extremely low deposition rate in comparison. Therefore, the size of suspended and deposited dust particles affects their distribution and as such requires different approaches to sampling these fractions. PM10 is the fraction of airborne (suspended) particulates which contains particles of diameter less than 10µm. PM2.5 is the fraction of airborne (suspended) particulates which contains particles of diameter less than 2.5µm. PM10 is most commonly associated with road dust and construction activities. Wear and tear of brakes and tyres on vehicles and crushing activities at construction sites can all contribute to a rise in PM10. Larger particles (100µm diameter) are likely to settle within 5-10m of their source under a typical mean wind speed of 4-5 metres per second (m/s), and particles between 30-100 µm diameter are likely to settle within 100m of the source. Smaller particles, particularly those<10 µm in diameter, i.e., PM10, have a greater potential to have their settling rate impeded by atmospheric turbulence and to be transported further from their source. Dust emissions are exacerbated by dry weather and high wind speeds. The impact of dust, therefore, also depends on the wind direction and the relative location of the dust source and receptor.

The prevailing wind in the development's locality is south-westerly (Windfinder.com, 2025). While dust will be blown towards the South Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA, given the scale of the works involved in this development, notable volumes of dust are not anticipated to enter the Natura 2000 sites. Additionally, dust will be blown away from the ex-situ supporting habitats present within Meadowbrook Park. Dust will be blown towards the Dodder\_050 surface watercourse located to the north of the site. However, the treeline present along the site's northern border will likely capture dust from site. Any dust that passes this substantial buffer and enters the Dodder\_050 would have to travel a further 8.9km within this watercourse to reach the Liffey Estuary Lower transitional waterbody, during which time it would undergo a notable degree of dilution and retention, reducing it to non-deleterious levels. Pollutants would have to travel a further 3km within the Liffey Estuary Lower transitional waterbody to reach the nearest Natura 2000 site, South Dublin Bay and River Tolka Estuary SPA. Furthermore, given the small scale of the project it is unlikely significant volumes of dust will be generated by the proposed works.

#### 6.2.6 Cumulative Impact

As the proposed project is not anticipated to have a likely significant effect on QIs/SCIs of the Natura 2000 sites within the ZoI; the likelihood for other plans or projects to act in combination with the proposed project to result in likely significant effects on Natura 2000 sites is greatly reduced. Further to this, as no notable impacts are anticipated along the main impact pathways, given the proposed project scale and location, the capacity of the proposed project to act in combination or cumulatively with a series of other sub-threshold developments is also not anticipated.

#### 6.3 Summary

Due to the location of the proposed site and the small scale of the works, the proposed project is not anticipated to have a likely significant effect via surface water, groundwater, groundwater-to-surface water, and land and air pathways to any Natura 2000 sites within the Zol.



# 6.3.1 Description of likely direct, indirect, or secondary impacts of the project (either alone or in combination with other plans and projects) on the Natura 2000 sites

Project	Comment				
Elements	Comment				
Size and scale	The proposed project involves the creation of a play space area in Ludford Meadowbrook Ballinteer. The scope of works generally includes breaking the existing ground, removing and storing the topsoil and grass sod, drainage if required, re-seeding, installation of play equipment and safety surfaces, bitmac paths, chestnut pale fencing and additional planting of trees.				
Land-take	There will be no direct land take from any Natura 2000 sites.				
Distance from Natura 2000 sites or key features of the	Natura 2000 site	Approximate direct distance	Approximate hydrological distance		
site	North Dublin Bay SAC	9.8km	14.3km indirect connection via surface water pathways		
	North Bull Island SPA	9.8km	14.3km indirect connection via surface water pathways		
	North-west Irish Sea SPA	9.8km	14.8km indirect connection via surface water pathways		
	South Dublin Bay and River Tolka Estuary SPA	4.8km	12km indirect connection via surface water pathways		
	South Dublin Bay SAC	5km	16.4km indirect connection via surface water pathways		
Resource requirements (water abstraction etc.)	There will be no surface water nor groundwater abstraction on-site during operations.				
Emissions (disposal to land, water or air)	Construction Phase: Water  The proposed development has an indirect hydrological connection to the five Natura 2000 sites, North Dublin Bay SAC, North Bull Island SPA, North-west Irish Sea SPA, South Dublin Bay and River Tolka Estuary SPA, and South Dublin Bay SAC, via the Dodder_050 surface watercourse. In order for surface water pollutants to enter the Dodder_050, pollutants would have to traverse 6m of grassy verge habitat. Any pollutants entering the Dodder_050 watercourse would have to travel 8.9km to reach the Liffey Estuary Lower transitional waterbody, and a further 3km within this waterbody to reach the nearest Natura 2000 site, South Dublin Bay and River Tolka Estuary SPA. During this time, any pollutants would undergo a notable degree of dilution and retention, reducing them to non-deleterious levels. Furthermore, given the small-scale of the project it is unlikely significant volumes of these pollutants will be generated on-site.				



Project	Comment
Elements	
	Air
	Due to the scale of the proposed development, the distance from the proposed site to the Natura 2000 sites, and the proposed construction schedule with the construction phase finishing before the winter period, likely significant effects via the air pathway (dust, emissions and disturbance) are not anticipated during the construction phase for the Natura 2000 sites and their respective QIs / SCIs.
	Operation Phase: Water
	Due to the operational nature of the proposed project, there will be no foul water emissions. Therefore, surface water pollution during the operational phase is not anticipated.
	Air
	Air-based operational emissions from the proposed project are not anticipated to impact the Qls/SCIs of the Natura 2000 sites within the ZoI.
Excavation requirements	Excavation is expected to be limited to the topsoil.
Transportation requirements	Transportation requirements
	Temporary Impacts:
	Levels of traffic to the site during the construction and operational phase will increase traffic to the site due to construction-based vehicles. Given the size and scale of the proposed project, and the distance between the site and the Natura 2000 sites, transportation requirements are not anticipated to affect the Natura 2000 sites and their respective QIs/SCIs.
	Permanent Impacts:
	Given the scale of the proposed project, transportation requirements will not negatively impact the Natura 2000 sites identified within the ZoI.
Duration of	The expected duration of construction is 3 months.
construction, operation, decommissioning etc.	Operation is expected to be permanent.



#### 6.3.2 Description of likely changes to the Natura 2000 sites

Potential Impact	Comments
Reduction of habitat area	There will be no temporary or permanent reduction in habitat area (including supporting ex-situ habitats) for any of the Natura 2000 sites.
Disturbance to key species	Temporary Impacts The construction works will temporarily increase the noise level and disturbance locally.  Permanent Impacts No disturbance to key species is anticipated during operation of the project.
Habitat or species fragmentation	There will be no temporary or permanent habitat or species fragmentation within any Natura 2000 sites.
Reduction in species density	There will be no temporary or permanent reduction in species density within any Natura 2000 sites, or any QIs / SCIs of these sites.
Changes in key indicators of conservation value (water quality etc.)	There will be no temporary changes in key indicators of conservation value, specifically surface water quality.
Climate change	N/A

#### 6.3.3 Description of likely impacts to the Natura 2000 sites as a whole

Potential Impact	Comments
Interference with the key relationships that define the structure of the site	Interference with the key relationships that define the structure of the sites are not anticipated.
Interference with key relationships that define the function of the site	Interference with the key relationships that define the structure of the sites are not anticipated.

Provide indicators of significance as a result of identification of effects set out above in terms of:

Potential Impact	Indicators
Loss (Estimated percentage of lost area of habitat)	No Natura 2000 sites will experience a direct loss in habitat area.
Fragmentation	Fragmentation of habitat and/or species is not anticipated.
Disruption & disturbance	Disruption and/ or disturbance is not anticipated for QI / SCI species in Natura 2000 sites or supporting ex-situ foraging habitats.



Potential Impact	Indicators
Change to key elements of the site (e.g., water quality etc.)	Potential temporary changes to key elements, e.g., water quality, are not anticipated.

6.3.4 Describe from the above elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is known.

Based upon best scientific judgement, no likely significant effects are expected from the elements mentioned above; and there are no elements where the scale or magnitude of impacts is unknown.

#### 6.4 Conclusion

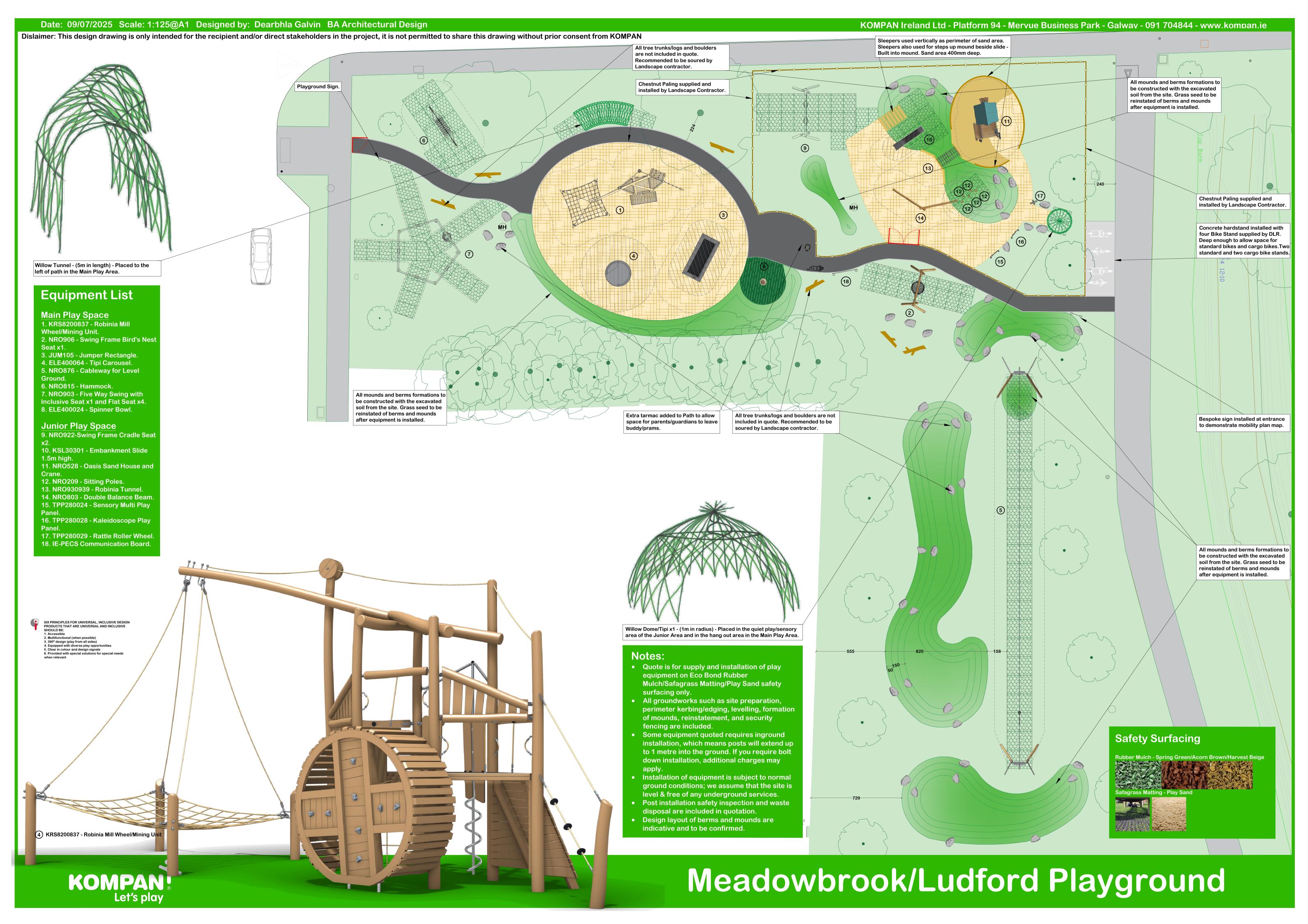
In carrying out this AA screening, mitigation measures have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any Natura 2000 sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available. Therefore, a Stage 2 Natura Impact Statement and appropriate mitigation is not required should this project proceed.

If any changes occur in the design of these works, a new Screening for Appropriate Assessment is required.



## A Site Layout





## **B** Ecological Note

The habitats adjacent to the site within the Meadowbrook Park area and along a section of the Wyckham Stream (of the Dodder\_050 waterbody) were surveyed for a separate project for DLRCC on 19/05/2025 by JBA Ecologists Matt Hosking and Jai Dolan (JBA, 2025). This survey included habitat mapping of the area of the Wyckham Stream within 6m of the proposed site's northern boundary and checking the suitability of these habitats to support the foraging activities of the QI/SCI species of the connected Natura 2000 sites. This site visit found no evidence of this area around the Wyckham Stream providing sufficient foraging resources for any QI/SCI species of the connected Natura 2000 sites. As such, no dedicated survey was conducted as part of the AA Screening for the proposed play space.

#### Non-QI/SCI protected species (Badger and Otter)

During the survey conducted on 19/05/2025, JBA surveyors found no evidence of Badger and Otter utilising the habitats within and adjacent to the area of the Wyckham Stream to the north of the proposed play space. Additionally, there was no evidence of either species within an area of Meadowbrook Park to the northwest of the proposed play space. These species may commute through the nearby area; however, the proposed play space would not interfere with their movement and potential foraging. Both Badger and Otter are excluded from the AA Screening on the grounds that an AA Screening deals strictly and exclusively only with QI species of Natura 2000 sites. Neither Otter nor Badger are QI species of any of the connected Nature 2000 sites for the proposed play space.

The coverage of these non-QI species would be contained within an Ecological Impact Assessment (EcIA), however, given that the area of the proposed play space would be of "Less than local ecological importance" for both of these species, in addition to the small scale of the project, the limited potential for pollutants that could be generated, an EcIA has not been carried out.



## **C NBDC Records**

### C.1 Protected species recorded within 2km of the site within the last 10 years

Species name	Date of last record	Designation
	Amphibians	
Common Frog Rana temporaria	16/04/2020	Protected Species: EU Habitats Directive    Protected Species: EU Habitats Directive >> Annex V    Protected Species: Wildlife Acts
Smooth Newt Lissotriton vulgaris	06/10/2020	Protected Species: Wildlife Acts
	Birds	
Barn Swallow Hirundo rustica	15/04/2021	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Black-headed Gull Larus ridibundus	14/01/2024	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Brent Goose Branta bernicla	29/12/2022	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Common Coot Fulica atra	08/04/2023	Protected Species: Wildlife Acts EU Birds Directive >> Annex II, III Birds of Conservation Concern - Amber List
Common Gull Larus canus	23/10/2024	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Common Kestrel Falco tinnunculus	16/04/2021	Protected Species: Wildlife Birds of Conservation Concern - Red List



Species name	Date of last record	Designation
Common Kingfisher Alcedo atthis	18/01/2021	Protected Species: Wildlife Acts EU Birds Directive >> Annex I Birds of Conservation Concern - Amber List
Common Linnet Carduelis cannabina	29/03/2022	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Common Pochard Aythya ferina	19/03/2019	Protected Species: Wildlife Acts EU Birds Directive >> Annex II, III Birds of Conservation Concern - Red List
Common Starling Sturnus vulgaris	01/03/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Common Swift Apus apus	14/05/2024	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Common Wood Pigeon Columba palumbus	02/05/2023	Protected Species: Wildlife Acts EU Birds Directive >> Annex II, III
Eurasian Curlew Numenius arquata	09/03/2018	Protected Species: Wildlife Acts EU Birds Directive >> Annex II Birds of Conservation Concern - Red List
Eurasian Oystercatcher Haematopus ostralegus	24/08/2024	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Goldcrest Regulus regulus	02/05/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Great Black-backed Gull Larus marinus	23/10/2024	Protected Species: Wildlife Acts
Grey Wagtail  Motacilla cinerea	08/03/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Red List
Herring Gull Larus argentatus	01/03/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List



Species name	Date of last record	Designation
House Martin Delichon urbicum	13/07/2019	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
House Sparrow Passer domesticus	09/01/2024	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Little Egret Egretta garzetta	20/02/2023	Protected Species: Wildlife Acts EU Birds Directive >> Annex I Bird Species
Little Grebe Tachybaptus ruficollis	10/02/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Mallard Anas platyrhynchos	08/04/2023	Protected Species: Wildlife Acts EU Birds Directive >> Annex II, III
Meadow Pipit Anthus pratensis	31/12/2020	Protected Species: Wildlife Acts Birds of Conservation Concern - Red List
Mediterranean Gull Larus melanocephalus	25/07/2021	Protected Species: Wildlife Acts EU Birds Directive >> Annex I Birds of Conservation Concern - Amber List
Mute Swan Cygnus olor	01/03/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List
Red Kite Milvus milvus	12/05/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Red List
Redwing Turdus iliacus	05/03/2023	Protected Species: Wildlife Acts Birds of Conservation Concern - Red List
Rock Pigeon Columba livia	01/03/2023	Protected Species: Wildlife Acts EU Birds Directive >> Annex II
Snowy Owl Bubo scandiaca	08/04/2016	Protected Species: Wildlife Acts EU Birds Directive >> Annex I Birds of Conservation Concern - Red List



Species name	Date of last record	Designation			
Tufted Duck Aythya fuligula	08/04/2023	Protected Species: Wildlife Acts EU Birds Directive >> Annex II, III Birds of Conservation Concern - Amber List			
Willow Warbler Phylloscopus trochilus	30/03/2021	Protected Species: Wildlife Acts Birds of Conservation Concern - Amber List			
	Invertebrates				
Large Red Tailed Bumble Bee Bombus (Melanobombus) Iapidarius	04/08/2023	Threatened Species: Near threatened			
Moss Carder-bee Bombus (Thoracombus) muscorum	07/09/2021	Threatened Species: Near threatened			
Те	Terrestrial Mammals				
Brown Long-eared Bat Plecotus auritus	11/08/2017	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts			
Common Pipistrelle Pipistrellus pipistrellus sensu stricto	11/08/2017	Wildlife Acts: Protected species EU Habitats Directive >> Annex IV			
Daubenton's Bat Myotis daubentonii	01/09/2016	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts			
Eurasian Badger Meles meles	29/09/2016	Protected Species: Wildlife Acts			
Eurasian Pygmy Shrew Sorex minutus	17/08/2015	Protected Species: Wildlife Acts			
Eurasian Red Squirrel Sciurus vulgaris	15/09/2018	Protected Species: Wildlife Acts			
European Otter  Lutra lutra	09/07/2017	EU Habitats Directive >> Annex II, IV Protected Species: Wildlife Acts			
Lesser Noctule Nyctalus leisleri	01/08/2018	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts			
Nathusius's Pipistrelle Pipistrellus nathusii	25/07/2021	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts			



Species name	Date of last record	Designation
Natterer's Bat Myotis nattereri	30/09/2016	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts
Pine Marten Martes martes	31/05/2021	EU Habitats Directive >> Annex V Protected Species: Wildlife Acts
Pipistrelle Pipistrellus pipistrellus sensu lato	20/06/2020	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts
Soprano Pipistrelle Pipistrellus pygmaeus	01/08/2018	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts
West European Hedgehog Erinaceus europaeus	10/08/2023	Protected Species: Wildlife Acts
Whiskered Bat Myotis mystacinus	01/09/2016	EU Habitats Directive >> Annex IV Protected Species: Wildlife Acts



## C.2 Invasive species recorded within 2km of site within the last 10 years

Species name	Date of last record	Designation		
Amphibians				
Common Toad Bufo bufo	29/03/2021	Moderate Impact Invasive Species Regulation S.I. 477 (Ireland)		
Flatworms ( <i>Turbellaria</i> )				
New Zealand Flatworm <i>Arthurdendyus</i> <i>triangulatus</i>	02/05/2025	High Impact Invasive Species		
Flora				
Butterfly-bush Buddleja davidii	20/07/2021	Medium Impact Invasive Species		
Cherry Laurel Prunus laurocerasus	08/06/2019	High Impact Invasive Species		
Evergreen Oak Quercus ilex	14/01/2025	Medium Impact Invasive Species		
Giant Hogweed Heracleum mantegazzianum	15/06/2019	High Impact Invasive Species Regulation S.I. 477 (Ireland)		
Himalayan Honeysuckle <i>Leycesteria formosa</i>	06/11/2021	Medium Impact Invasive Species		
Japanese Knotweed Fallopia japonica	12/04/2021	High Impact Invasive Species Regulation S.I. 477 (Ireland)		
Sycamore Acer pseudoplatanus	08/06/2019	Medium Impact Invasive Species		
Three-cornered Garlic Allium triquetrum	07/04/2021	Medium Impact Invasive Species Regulation S.I. 477 (Ireland)		
Invertebrates				
Harlequin Ladybird	03/11/2024	High Impact Invasive Species		
Harmonia axyridis	55,11,2524	Regulation S.I. 477 (Ireland)		
Oak Processionary Thaumetopoea processionea	30/06/2020	High Impact Invasive Species		

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Species name	Date of last record	Designation			
Molluscs					
Zebra Mussel Dreissena (Dreissena) polymorpha	19/01/2024	High Impact Invasive Species Regulation S.I. 477 (Ireland)			
Terrestrial Mammals					
Eastern Grey Squirrel Sciurus carolinensis	16/01/2023	High Impact Invasive EU Regulation No. 1143/2014 Regulation S.I. 477 (Ireland)			
Fallow Deer Dama dama	30/03/2016	High Impact Invasive Species Regulation S.I. 477 (Ireland) Protected Species: Wildlife Acts			



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