

Dunlaoghaire-Rathdown County Council 2 Marine Rd, Dún Laoghaire, Dublin, A96 K6C9

17/01/2024

## Addendum to AA Screening and EcIA for Shanganagh Park 1 (Part 8) proposed amendments.

To whom it may concern.,

Alternar are the appointed ecologists for the proposed development of park improvement works at Shanganagh Park 1 (Part 8).

Altemar prepared an Appropriate Assessment Screening for the previous development which included a wintering bird survey (dated 3rd April 2023). The AA Screening concluded 'No European sites are within the zone of influence of the proposed development. In the absence of mitigation measures and having taken into consideration the proposed works, the potential pathways for impacts from the development site, the potential for in-combination effects, the distance between the proposed development site to designated conservation sites, the lack of a direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution, mixing and settlement effect within the drainage network, watercourses and in the marine environment in addition to the Wintering Bird Assessment Report, it is concluded that the development would not give rise to any significant effects to designated sites. The construction and operation of the development will not impact on the conservation objectives of qualifying interests of European sites. An assessment in relation to potential in-combination effects was carried out. There is no direct pathway from the proposed development site to designated sites. All indirect pathways lead to the marine environment prior to reaching European sites. No significant cumulative impacts on European sites are likely to arise from the proposed development when considered together with other plans or projects. There will be no in combination effects from other projects in the vicinity of the proposed development."

In addition, Altemar prepared an Ecological Impact Assessment (EcIA) for the proposed development. The EcIA concluded "The proposed development will change the local environment as new lights are to be erected and some of the existing vegetation will be removed. No bat roosts or potential bat roosts will be lost or impacted due to this development and the species expected to occur onsite will persist. In the absence of mitigation minor loss of foraging areas through the site will be seen when lighting is on. However, mitigation has been placed within the design and operation of the proposed lighting. During operation time restrictions will be in place during the bat foraging season. Landscaping is provided to enhance bat foraging on site and the placing of trees will be carried out in consultation with the project ecologist to create additional foraging corridors and assist in further limiting light spill.

The residual impact is considered to be minor adverse/not significant in the short term and low beneficial positive in the long term. However, it should be noted that the planting of scattered trees and parkland habitat will improve the site for bat foraging and potential bat roosting."

Permission is now being sought for minor amendments to the previously permitted design and include:

Taking account of the above, the following amendments are being proposed;

- Re-locate the pitch in an easterly direction including the ballstop netting and goalposts to preserve the Archaeological Material in Situ.
- Remove the floodlighting from the pitch.
- Amend the levels to create the pitch and install drainage.
- Change the viewing mound location slightly.
- Amend the bio-retention pond slightly but retain the same volume.

The new General Arrangement of the modification is seen in Figure 1, the drainage in Figure 2, Light spill in Figure 3 and arborist impact in Figure 4.

## **Appropriate Assessment**

In relation to the Appropriate Assessment Screening of the project, I have reviewed the application documentation and additional projects in the vicinity of the proposed development for incombination effects, in line with updated AA guidance and case law. I conclude that the proposed project does not cause any significant alteration to the findings of the previous AA Screening and conclude that this development alone or in combination with other projects that would not give rise to any significant effects to designated (Natura 2000) sites.

## **Ecological Impact Assessment**

In relation to the EcIA and assessment of the amended project the following should be noted:

1) The removal of the lighting on the pitch would be seen as a minor positive aspect to the project. In the previous lighting scheme strict lighting timelines were in place for the benefit of bat species. These lighting restrictions will continue to be in place for the track area. It should be noted that the benefits for bats would be as a result of the removal of lighting on the pitch and would allow for foraging by bats over the pitch at all times.

The updated lighting with 2 lux (dark blue), 5 lux (green) 10 lux (light blue) isolines at 100% power at 2m high are seen in Figure 3. The project revision has restricted lighting to the track only, with no lighting on the pitch. There is very limited light spill, no greater than 2 lux, onto the existing lit footpath. However, lighting does extend onto the grassland beside the track but this would not be seen to be significant for bats. This lighting was in place in the previously approved project. In addition, the same seasonal lighting timing constraints will be in place as outlined in the bat assessment. Overall the modifications are seen as positive for bats.

2) The movement of the pitch has resulted in the retention of stands of trees that were to be removed previously. This would be seen as a positive step for the project and biodiversity. As seen from Figure 1 further tree planting is proposed.

Similarly, to the previous development the residual impact is considered to be minor adverse/not significant in the short term and low beneficial positive in the long term.

Kindest Regards

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Bryan Deegan, Director, Altemar Limited.

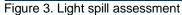


Figure 1. General Arrangement.



Figure 2. Drainage Layout





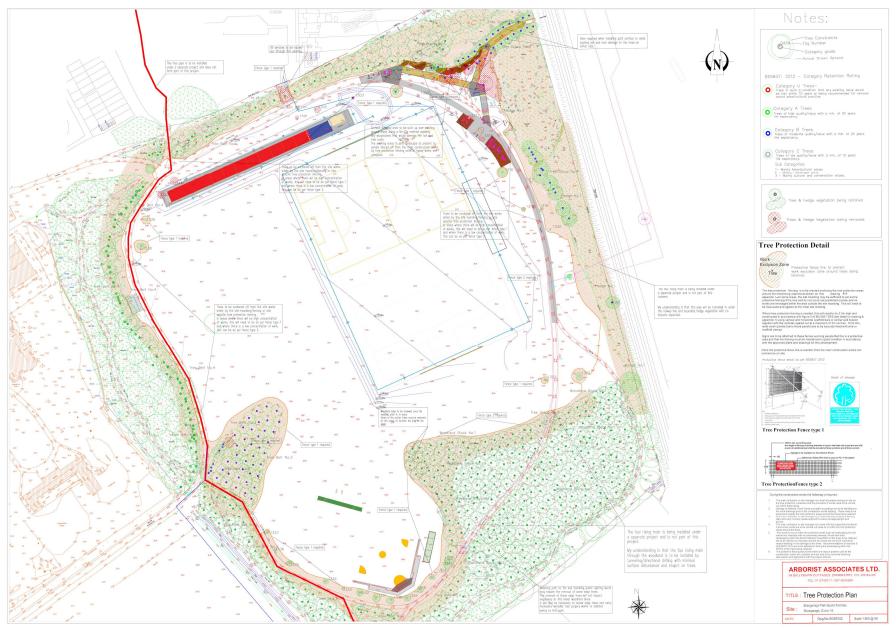


Figure4. Arborist Impact Assessment.