

Appropriate Assessment – Stage 1: Screening Report

Proposed Purpose-Built Student Accommodation Scheme (PBSA) at Goatstown Road, Dublin 14

On behalf of
Orchid Residential Ltd.





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Contents

1	INTRODUCTION	1
1.1	Purpose of this Report.....	1
1.2	Background	2
1.3	Statement of Authority.....	2
1.4	Regulatory Context	2
1.5	Stages of Appropriate Assessment.....	3
2	SCREENING FOR APPROPRIATE ASSESSMENT.....	5
2.1	Methodology	5
2.1.1	Determining Zone of Influence.....	5
2.1.2	Source-Pathway-Receptor Model	5
2.1.3	Desk Based Studies	6
2.1.4	Field Survey	6
3	DESCRIPTION OF THE PROPOSED DEVELOPMENT	8
3.1	Site Context and Description	8
3.2	Watercourses within the Vicinity of the Site	8
3.2.1	Drainage Ditches	9
3.3	Proposed Development	9
3.3.1	Drainage	10
3.4	Construction and Demolition Procedures.....	11
3.4.1	Demolition.....	12
3.4.2	Construction (Base)	13
3.4.3	Excavation	13
3.4.4	Removal and Storage of Excavated Material	13
3.4.5	Construction Timeline.....	14
3.5	Monitoring Works	14

4	IDENTIFICATION OF EUROPEAN SITES.....	15
4.1	Identification of European Sites within Zol	16
4.2	Conservation Objectives	18
5	SCREENING AND ASSESSMENT OF POTENTIAL IMPACTS ..	19
5.1	Analysis of ‘In-Combination’ Effects	19
6	SCREENING CONCLUSIONS AND STATEMENT	28
7	REFERENCES	29

FIGURES

Figure 1-1: Site Location	1
Figure 3-1: Site Context	8
Figure 3-2: Watercourses in the Vicinity of the Site	9
Figure 4-1: European sites within 15km of the Site	15

TABLES

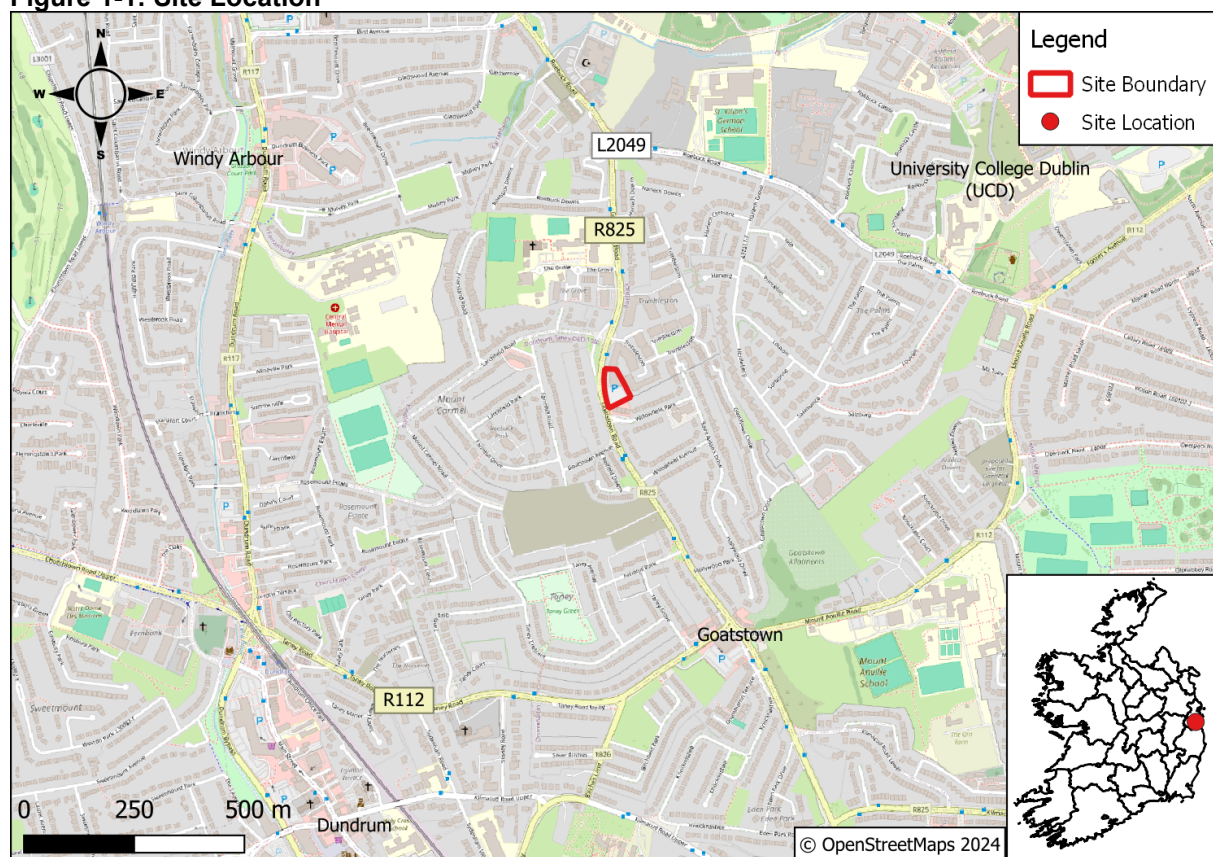
Table 4-1: European Designated Sites within 15km of the Site	16
Table 5-1: Active Planning Applications within the Site	19
Table 5-2: Planning Applications within the vicinity of the Site.....	20

1 INTRODUCTION

Malone O'Regan Environmental ('MOR Environmental') was commissioned by Orchid Residential ('the Applicant') to undertake an Appropriate Assessment Screening Report ('AA') to assess the potential adverse effects, if any, of the proposed purpose-built student accommodation scheme ('PBSA') and all ancillary works ('the Proposed Development') at Goatstown, Dublin 14, (OS Reference ITM 717750 728959) on nearby sites with European conservation designations (i.e., Natura 2000 sites).

The Proposed Development is located on a circa ('ca.') 0.34 hectares ('ha') site ca. 600m north of Goatstown town centre and ca. 1km southwest of the University College Dublin ('UCD') Belfield Campus and is shown in Figure 1-1 ('the Site'). The Site is zoned Objective 'A' "To provide residential development and improve residential amenity while protecting the existing residential amenities" under the Dún Laoghaire and Rathdown County Development Plan 2022-2028 [1]. Given the zoning objective applicable to the Site, it is considered that the proposed development is acceptable in principle.

Figure 1-1: Site Location



1.1 Purpose of this Report

The purpose of this assessment was to determine the appropriateness, or otherwise, of the proposed works in the context of the conservation objectives of European sites through the research and interpretation of the best scientific, geographic and engineering knowledge. This report seeks to determine whether the Proposed Development will, on its own or in combination with other plans/projects have a significant effect on the integrity of European sites within a defined zone of influence of the Site. This AA has been prepared without considering measures intended to avoid or reduce an impact on a European site.

1.2 Background

The Site is currently used as a car showroom, with planning permission for development at the Site submitted previously under P.Ref D10A/0623 (An Bord Pleanála (ABP) Ref:PL06D.238413) and P.Ref D07A/0984 (ABP Ref:PL06D.227350). Both applications were refused.

In February 2021, permission was granted for a Strategic Housing Development ('SHD') at the Site by ABP (ABP Ref: ABP30835320). This decision was subsequently quashed by the High Court in September 2022.

In April 2022, an application was resubmitted to An Bord Pleanála for a SHD at the Site (Planning Ref: ABP31323522). No decision has been made to date.

This planning application will supersede the previous SHD application. This Large-Scale Residential Development (LRD) application has only minor differences to the 2022 application, including differences to the landscaping treatment of the roof level and amenity gardens.

1.3 Statement of Authority

This report was reviewed and approved by Ms. Kathryn Broderick, Principal Consultant - Ecologist. Kathryn has over 7 years' experience working in the ecological consultancy sector. As part of her role, Kathryn is required to undertake habitat surveys and appraisals as well as specialist-protected species surveys in support of Ecological Impact Assessments and Appropriate Assessments. Kathryn has also completed a diploma Environmental Law and Planning, which had a focus on EIA and AA assessment, which has provided her with a comprehensive understanding of the legal context and requirements of these types of assessments.

1.4 Regulatory Context

The following guidance documents were adhered to for the preparation of this AA report:

- OPR Practice Note PN01, *Appropriate Assessment for Screening for Development Management*, The Office of the Planning Regulator [2];
- *Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, European Commission [3];
- *Guidelines for Ecological Impact Assessment in the UK and Ireland*, Chartered Institute of Ecology and Environmental Management [4];
- *Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC*, European Commission [5];
- *Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities*, DoEGLH [6]; and,
- *Appropriate Assessment under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10*, DoEGLH [7].

This AA was prepared in accordance with and in compliance with the following legislation:

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna better known as "The Habitats Directive". This provides the framework for legal protection for habitats and species of European importance. Articles 3 to 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. The Habitats Directive was transposed into Irish law by the Planning and Development Act 2000

(as amended) and the European Communities (Birds and Natural Habitats) Regulations (S.I. 477 / 2011) (as amended) [8].

For completeness, the Planning and Development Act 2000 (as amended) states “*European site*” means:

- a. A candidate site of Community Importance;
- b. A site of Community Importance, F815 [(ba) a candidate Special Area of Conservation];
- c. A Special Area of Conservation (SAC);
- d. A candidate Special Area of Conservation (cSAC); or,
- e. A Special Protection Area (SPA)

These 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 as amended 2009/149/EC) (better known as “The Birds Directive”). The Birds Directive was also transposed into Irish law through the Planning and Development Act 2000 (as amended) and S.I 477 / 2011 [8].

Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment.

“Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implication 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”.

The Habitats Directive promotes a hierarchy of avoidance, mitigation, and compensatory measures. First, the project should aim to avoid any negative impacts on European sites by identifying possible impacts early in the planning stage and designing the project in order to avoid such impacts. Second, mitigation measures should be applied, if necessary, during the AA process to the point, where no adverse impacts on the site(s) remain. If the project is still likely to result in adverse effects, and no further practicable mitigation is possible, it must be rejected unless it follows the process established under Article 6(4). If the project is required for imperative reasons of overriding public interest (‘IROPI’ test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effects.

1.5 Stages of Appropriate Assessment

There are four distinct stages to undertaking an AA as outlined in current European Union (‘EU’) and Department of Environment, Heritage and Local Government (‘DoEHLG’) guidance:

Stage 1: Screening

This process identifies the potential impacts of a plan or project on a Natura site, either alone or in combination with other plans and projects and considers whether these impacts are likely to be significant. If potentially significant impacts are identified, the plan or project cannot be screened out and must proceed to Stage 2.

Stage 2: Appropriate Assessment

Where potentially significant impacts are identified, an assessment of the potential mitigation of those impacts is required; this stage considers the appropriateness of those mitigation measures in the context of maintaining the integrity of the Natura 2000 sites. If potential significant impacts cannot be eliminated with appropriate mitigation measures, the assessment must proceed to Stage 3.

Stage 3: Assessment of Alternatives Solutions

This process examines alternative ways to achieve the objectives of the plan or project that avoid adverse impacts on the integrity of the Natura 2000 site if mitigation measures are deemed insufficient.

Stage 4: Imperative Reasons of Overriding Public Interest (IROPI)

Assessment where no alternative solution exists for a plan or project and where adverse impacts remain. This includes an assessment of compensatory measures, where in the case of projects or plans, can be considered necessary for IROPI.

2 SCREENING FOR APPROPRIATE ASSESSMENT

Screening determines whether Appropriate Assessment is necessary by examining:

1. Whether a plan or project can be excluded from AA requirements because it is directly connected with, or necessary to, the management of a European site; and,
2. Whether the project will have a potentially significant effect on a European site, either alone or in combination with other projects or plans, in view of the site's conservation objectives.

Screening involves the following:

- i) Description of a plan or project;
- ii) Identification of relevant European sites, and compilation of information on their qualifying interests and conservation objectives;
- iii) Assessment of likely effects – direct, indirect, and cumulative – undertaken on the basis of available information as a desk study or field survey or primary research as necessary; and,
- iv) Screening Statement with conclusions.

2.1 Methodology

2.1.1 Determining Zone of Influence

The starting point for this assessment was to determine the Zone of Influence. The Zone of Influence ('Zoi') comprises of the area in which the Proposed Development may potentially affect the conservation objectives (or qualifying interests) of a European site.

Guidance in Appropriate Assessment of plans and projects in Ireland notes that a distance of 15km is recommended for the identification of relevant European sites [6]. However, guidance from the NPWS recommends that the distance should be evaluated on a case-by-case basis with reference to the nature, size and location of the project, the sensitivities of the ecological receptors, and the potential for in-combination effects (cumulative) [7]. For some projects the distance could be greater than 15km, and in some cases less than 100m.

Definition of the zone of influence for the proposed works includes evaluating the following:

- Identification of the European sites that are situated within, in close vicinity or downstream within the zone of influence of the Proposed Development;
- Identification of the designated habitats and species and Conservation Objectives for the identified European sites;
- Identifying of the environmental conditions that stabilise and increase the qualifying interests of the Natura sites towards favourable conservation status;
- Identification of the threats/impacts – actual or potential that could negatively impact the conservation objectives for the European sites;
- Identifying the activities of the proposed works that could give rise to significant adverse impacts; and,
- Identification of other plans or projects, for which in-combination impacts would likely have significant adverse effects.

2.1.2 Source-Pathway-Receptor Model

European sites are only at risk from significant effects where a source-pathway-receptor link exists between a Proposed Development and European sites. This can take the form of a

direct impact (e.g. where the Proposed Development is located within/in close vicinity to the boundary of a European site), or an indirect impact where impacts outside of the European site but affect ecological receptors within (e.g. impacts to water quality which can affect estuarine habitats at a distance from the impact source).

The likely effects of the Proposed Development on any European site has been assessed using a source-pathway-receptor model. A source-pathway-receptor model is a standard tool used in environmental assessment [9, 10]. The model comprises of:

- A *source*: any potential impacts from the Proposed Development, e.g. the runoff of sediment/construction pollution.
- A *pathway*: the means or route by which a source can affect the ecological receptor.
- A *receptor*: the qualifying interests and/or special conservation interests of the European sites.

In order to establish the Zone of Influence of the Proposed Development works, the likely key environmental impacts/changes associated with the Proposed Development were determined having regard to the project characteristics set out in Section 3.3 of this report. Zone of Influence for various potential impact pathways are discussed in Section 4.1.

2.1.3 Desk Based Studies

A desk-based review of information sources was completed, which included the following sources of information:

- Review of aerial maps of the Site and surrounding area;
- The National Parks and Wildlife Service ('NPWS') website was consulted with regard to the most up-to-date detail on conservation objectives for the European sites relevant to this assessment [11];
- The National Biodiversity Data Centre ('NBDC') website was consulted with regard to species distributions [12];
- The Environmental Protection Agency ('EPA') Maps website was consulted to obtain details about watercourses in the vicinity of the Site [13];
- The Dun Laoghaire Rathdown County Council ('DLRCC') Planning Portal to obtain details about existing/proposed developments in the vicinity of the Site [14]; and,
- The Department of Housing, Local Government and Heritage's planning portal – the National Planning Application Database to obtain details about existing/proposed developments in the vicinity of the Site [15].

2.1.4 Field Survey

A Site walkover was undertaken on 23rd March 2022 by two suitably qualified and experienced MOR ecologists, to assess extent and the quality of habitats present on the Site and to identify any potential ecological receptors associated with the European sites. An updated Site walkover was also undertaken on 12th March 2024 to assess any potential changes in the habitats onsite.

The habitat survey was undertaken for the Proposed Development utilising the Heritage Council's – '*A Guide to Habitats in Ireland*' [16]. This is the standard habitat classification system used in Ireland and includes both a desk-based and field-based assessment.

The assessments were extended to also identify the potential for these habitats to support other features of nature conservation importance, such as species afforded legal protection under either Irish or European legislation.

2.1.4.1 Survey Limitations

No survey limitations were encountered.

3 DESCRIPTION OF THE PROPOSED DEVELOPMENT

3.1 Site Context and Description

The Proposed Development is located within the townland of Roebuck, within a predominately urban and residential landscape. The Proposed Development is on a ca. 0.34 ha site ca. 600m north of Goatstown town centre and ca. 1km southwest of the UCD Belfield Campus. The Site currently comprises an existing car showroom building and a hard surface parking area.

The Site is accessed off the R825 regional road which is located immediately to the west of the Site boundary.

The Site is bordered to the north, east and west by apartment complexes and residential estates, while directly to the south of the Site are retail outlets (Refer to Figure 3-1).

Figure 3-1: Site Context



3.2 Watercourses within the Vicinity of the Site

The Site is located within the Liffey and Dublin Bay catchment [Catchment_ID: 09] and the Dodder_SC_010 subcatchment [Subcatchment_ID: 09_16] [13].

As per EPA Maps, no watercourses were identified within 500m of the Site, and no hydrological connection was identified between the Site and any identified watercourse.

The nearest hydrological feature to the Site is an unmarked watercourse ca. 580m northwest at its closest point. However, there is no hydrological connection between the Site and this watercourse. This watercourse appears to be culverted in sections, flowing for ca. 1.5km into a feature named 'The Lake' within the UCD Belfield Campus. This feature appears to discharge into the Elm Park Stream via an underground connection. The Elm Park Stream flows for a further 1.3km before discharging directly into Dublin Bay.

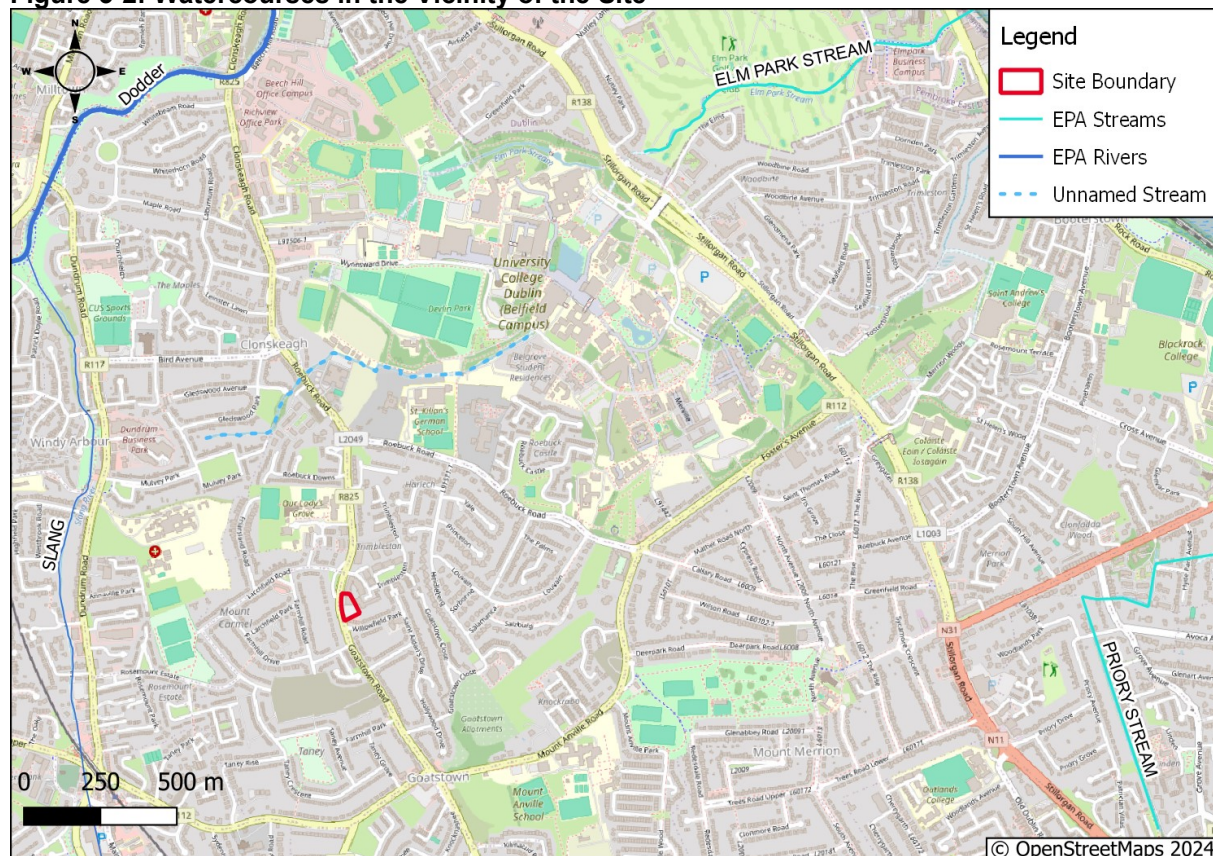
Under the Water Framework Directive ('WFD') 2000/60/EC, the EPA classifies the status and the risk of not achieving good water quality status for all waterbodies in Ireland [13]. According to the river waterbody WFD 2016-2021, the most up-to-date data at the time of writing this assessment, the Elm Park Stream belongs to the Brewery_Stream_010 WFD surface waterbody. The Elm Park Stream has a 'Poor' Status according to the river waterbody WFD 2016-2021 and the water quality within the Elm Park Stream is 'Under Review' [13].

The River Slang is located ca. 900m west of the Site. This river discharges into the River Dodder ca.1.5km downstream, which flows in a north-easterly direction for ca. 5.1km before joining the River Liffey. The River Liffey then flows in an easterly direction for approximately 5.7km before discharging into Dublin Bay. As above, there is no hydrological connection to this waterbody from the Site.

According to the river waterbody WFD 2016-2021, the water quality within the River Dodder and River Slang is considered to be 'moderate,' and the status of these rivers are considered to be 'at risk' [13].

The location of the key surface water features in the vicinity of the Site are illustrated in Figure 3-2 below.

Figure 3-2: Watercourses in the Vicinity of the Site



3.2.1 Drainage Ditches

No drainage ditches were identified onsite or within the immediate vicinity of the Site.

3.3 Proposed Development

The Proposed Development will involve the demolition of the existing onsite structures and hardstanding in order to facilitate the construction of the proposed PBSA and associated site works. The Proposed Development will comprise the following elements:

- 220 no. student bedspaces (including 10 no. studios), all within a part single storey, part 4 no. storey and part 6 no. storey 'U'-Shaped building;
- The building is single to 4 no. storeys along the southern boundary (with a roof terrace at 4th floor level) and part 5 and 6 storeys along Goatstown Road (with setbacks) and boundary to the north (with roof terrace at 5th floor level fronting onto Goatstown Road);
- Amenity space equating to c. 1,785 sqm is provided across the site consisting of c. 1,247 sqm of external amenity in the form of a central courtyard at ground level and roof terraces at 4th and 5th floor levels;
- Internal amenity space equating to c. 538 sqm is provided in the form of 2 no. ground floor lounge/study areas, kitchen/tearoom, laundry, and concierge/office space;
- Provision of 248 no. bicycle parking spaces distributed within the central courtyard, north of the site and adjacent to the front boundary;
- Provision for 6 no. carparking spaces comprising 2 no. disabled parking spaces and 4 no. set down parking spaces adjacent to the front entrance to the site;
- Vehicular access to the site is via Goatstown Road from 2 no. entrance points [reduction from 3 no. entrances currently];
- Ancillary single storey ESB substation and switch room and refuse store are provided at ground level; and,
- Provision of surface water and underground attenuation and all ancillary site development works including site wide landscaping works, lighting, planting and boundary treatments.

3.3.1 Drainage

Existing Surface Water Drainage System

There is an existing car showroom to the north of the site, with the remaining area consisting of tarmac surfacing. Surface water drains via a series of gullies and surface drains to the existing public sewer under the Goatstown road to the west of the site. There is no evidence of flow control devices restricting discharge rates from the site. As the existing site consists entirely of impermeable surfaces the unattenuated outflow has been calculated as follows for a 50mm/hr storm: 47.8 l/s.

As will be discussed in Section 2.3.2 below, the proposed drainage system will restrict the peak flow rate during the 100-year storm event to 1.57l/s, representing a very significant improvement on the current situation.

Proposed Surface Water Drainage System

The Proposed Development will receive rainfall onto a mix of surfaces, such as green roofing, harvested roofing, permeable paving and soft landscaping. Infiltration tests carried out onsite show that the Site is underlain by boulder clay of insignificant permeability and so soakaways are not considered feasible. Further soakaway tests will be carried out prior to construction of the drainage infrastructure and if infiltration is found to be available in certain areas it will be utilised as appropriate to minimise the volume of run-off discharged from the site. Run-off generated will be partially intercepted by the various surface finishes and the overflow will discharge to a concrete attenuation tank or lined Stormtech system, with a hydrobrake manhole restricted to the QBAR value for the Site. Discharge from the tank will subsequently fall via gravity to the existing public surface water pipe running along the Goatstown road to the west of the Site.

Existing Foul Sewer Infrastructure

There is an existing 225mm diameter sewer running along the western boundary of the site, falling northwards along the Goatstown Road.

Proposed Foul Sewer System

It is proposed to connect the foul water network to the existing foul sewer using a 225mm pipe. All foul effluent will leave the site via gravity. As this site is intended solely for student accommodation the wastewater produced per person is reduced to 100l/day.

Foul Sewer Network Pipe Sizes

A 225 mm diameter foul pipe at 1:200 minimum fall has a capacity = 34 l/s, which is sufficient for all foul pipework. The Foul Drainage system will be in accordance with UE Standard Details & Code of Practice.

For further details please refer to the Civil Engineering Infrastructure Report & Flood Risk Assessment for Planning prepared by Barrett Mahony Civil & Structural Consulting Engineers submitted as part of the overall planning application.

3.3.1.1 Site Access

Vehicular access to the Site will be via two access and egress points on the Goatstown Road (R825) along the western boundary. Two designated pedestrian access points and one cyclist access point will also be provided from the footpath that runs along the R825 on the western boundary of the Site.

Detailed drawings of the Site access layout can be found in the Vehicle Tracking and Sightlines Analysis prepared by Barrett Mahony Civil & Structural Consulting Engineers submitted as part of the overall planning application.

3.3.1.2 Landscaping

Landscape planting will be undertaken as part of the Proposed Development. Landscape planting will include:

- Planting of semi-mature trees,
- Creation of amenity grassland;
- Planting of shrubs; and,
- Ornamental planting.

Tree selection has taken into account location, orientation, and weather exposure. The trees proposed are mainly native and well-suited for the Irish climate. Trees near the site boundary will be planted in grassy areas alongside a mixture of shrubs in order to provide screening for the Site.

The Proposed Development will also include the creation of green roofs on both the 4th and 5th floors comprising areas of pavement, ornamental bamboo, garden plants, trees, and seating.

For further details please refer to the Landscape Rationale Report prepared by Ronan MacDiarmada Landscape Architects and Consultants submitted as part of the overall planning application.

3.4 Construction and Demolition Procedures

During the construction and demolition phase, the methods of working will comply with all relevant legislation and best practice guidelines in reducing the environmental adverse effects of the works. Although construction phase adverse effects are generally of a short-term duration and are localised in nature, the adverse effects will be reduced as far as practicable through compliance with current construction industry guidelines.

All potential construction and demolition phase environmental impacts have been addressed through the following reports prepared by AWN and submitted as part of the overall planning application: Operational Waste Management Plan (OWMP), Construction Environmental Management Plan (CEMP) and Resource Waste Management Plan (RWMP). These plans detail how during the demolition stage of the Proposed Development, the existing structure and hardstanding onsite will be removed. This will involve four distinct elements:

- Checking for hazards;
- Removal of Components;
- Removal of Roofing; and,
- Excavation of Services, Demolition of Walls and Concrete.

These stages are discussed further in Section 3.4.1 below.

These reports also detail the measures to be followed should hazardous or non-hazardous wastes be produced onsite. Materials will also be stored and managed in ways that reduce the risk of pollution events, such as storing liquid materials banded containers and removing waste materials regularly from the Site. These measures should be followed during the construction phase of the Proposed Development to minimise the risk of pollution events onsite.

The following guidance will be referred to and will be followed during the construction phase of the Proposed Development to prevent pollution that may occur within the area:

- Construction and Demolition Waste Management – a handbook for Contractors and Site Managers [17];
- The National Waste Management Plan for a Circular Economy 2024 – 2030 [18];
- Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects [19];
- BS 6187 – Code of Practice for Full and Partial Demolition [20]; and
- C741 - Environmental Good Practice on Site (4th edition) [21] [21].

3.4.1 Demolition

The existing structures on site will be demolished as an enabling works contract prior to the construction of the proposed development. As the existing building was constructed and in use over a period when asbestos was widely used in buildings, a detailed asbestos survey will be carried prior to the commencement of demolition works. The demolition shall be in full compliance with BS 6187 *'Demolition in Buildings'* [20] and all measures necessary will be taken to protect the adjoining buildings from damage and persons from injury.

Prior to the demolition works a RWMP will be produced in compliance with *'Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects'* by the EPA [19]. This RWMP will be prepared/updated by the appointed Demolition Contractor including any subsequent planning conditions.

The demolition will commence with the removal of any hazardous materials by an appropriately qualified contractor for disposal at an appropriate licensed waste collection facility. All non-structural items will then be removed segregated for re-use or re-cycling where possible. The remainder of the building structure will be removed in an approved sequence outlined in a Method Statement prepared by the Demolition Contractor's Structural Engineer.

3.4.2 Construction (Base)

Ground works will be required to clear the Site and to facilitate construction of an additional basement level, building foundations and utilities. The site investigation report produced by Causeway Geotech provides a summary of the anticipated stratigraphy of the soil beneath the site. It concluded that the Site is underlain mostly by made ground, gravel and boulder clay.

It is not anticipated that the development site works, or excavation works will be deep enough to impact the underlying bedrock geology.

3.4.3 Excavation

The project excavations will involve excavations for new foundations, site levelling and excavations for roads and services. The RWMP prepared by AWN Consulting Ltd. (247501.0135WMR01) for the Proposed Development will be updated by the main contractor and will be in compliance with the requirements of the '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects*' [19], which will identify and categorise any waste arising from the Proposed Development.

It has been calculated by the project engineers that ca. 3,300m² of topsoil, made ground, gravel & clay will be excavated to facilitate the construction of the proposed ground level other ancillary works. It is envisioned that all excavated material arising on the Site will be removed from the Site.

3.4.4 Removal and Storage of Excavated Material

The majority of construction waste materials generated will be soil from excavation works. Material will be removed from site regularly to ensure there is minimal need for stockpiling.

The RWMP contains the proposals for the minimisation, re-use and re-cycling of waste generated at the Site in compliance with the provisions of the '*Waste Management Act 1996*' [22] as amended, and associated regulations, the '*Litter Pollution Act 1997*' [23], as amended and the '*Eastern-Midlands Region Waste Management Plan 2015 – 2021*' [24]. As part of this plan, separate storage areas will be designated on the Site for various types of material in order to maximise the re-use and re-cycling potential. Procedure will also be put in place to ensure that all sub-contractors fulfil the requirements of the RWMP.

The main waste storage area will be located in a compound at the Site. A dedicated and secure area containing bins, and/or skips, and storage areas, into which all waste materials generated by construction activities will be established within the Proposed Development.

Waste materials generated will be segregated at the site compound, where it is practical. Where the on-site segregation of certain wastes types is not practical, off-site segregation will be carried out. There will be skips and receptacles provided to facilitate segregation at source. All waste receptacles leaving site will be covered or enclosed. The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the Dún Laoghaire Region that provide this service.

The site Resource Manager will ensure that all staff are informed of the requirements for segregation of waste materials by means of clear signage and verbal instruction. Appointed employees will be made responsible for ensuring good site housekeeping.

Backfilling

Excavated material will be reused as part of the Site development works where possible to minimise truck movements to and from the Site (e.g. use as non-structural fill under green areas).

3.4.5 Construction Timeline

The proposed works will aim to be completed in ca. 24 months from the grant of planning conditions. Working hours will generally be restricted to between 08:00 and 18:00 hours Monday to Friday inclusive and between 08:00 and 14:00 hours on Saturdays. Construction work will not be permitted on Sundays, public holidays or at night-time except where safety concerns necessitate it or if agreed in advance with the Planning Authority.

3.5 Monitoring Works

A suitably qualified and experienced Ecological Clerk of Works (ECoW) will inspect the Site in advance of works commencing.

4 IDENTIFICATION OF EUROPEAN SITES

In accordance with the European Commission Methodological Guidance [25] a list of European sites that can be potentially affected by the Proposed Development has been compiled. Guidance for Planning Authorities prepared by the Department of Environment Heritage and Local Government [6] states that defining the likely zone of impact for the screening and the approach used will depend on the nature, size, location and the likely significant effects of the project. The key variables determining whether or not a particular European site is likely to be negatively affected by a project are:

- The physical distance from the Site to the European site;
- The presence of impact pathways;
- The sensitivities of the ecological receptors; and,
- The potential for in-combination effects.

All SPAs and SACs within 15km have been considered to assess their ecological pathways and functional links. As acknowledged in the OPR guidelines [2], few projects have a zone of influence this large, however the identification of European sites within 15km has become widely accepted as the starting point for the screening process. For this reason, all SPAs and SACs in 15km have been identified for consideration as part of the screening.

There are 16 European sites located within 15km of the Site - these are identified in Figure 4-1 and Table 4-1.

Figure 4-1: European sites within 15km of the Site

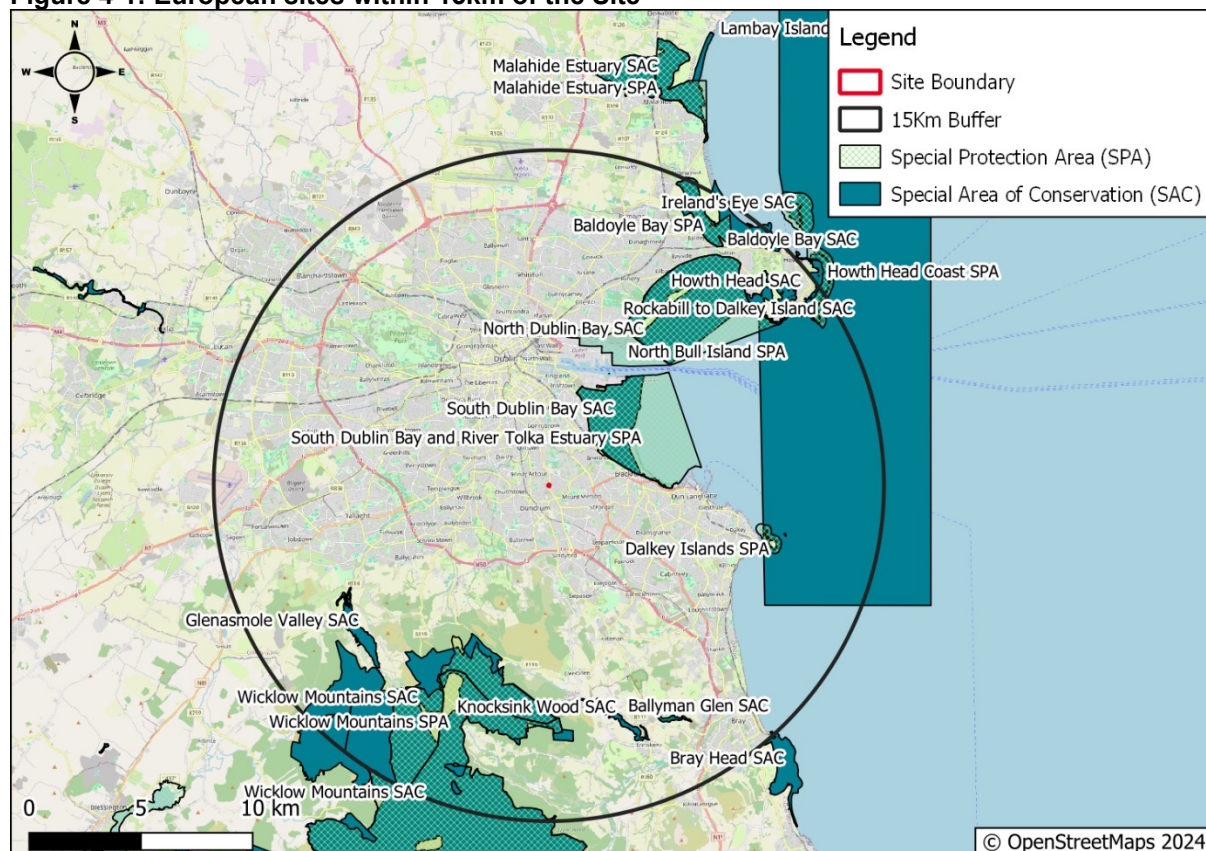


Table 4-1: European Designated Sites within 15km of the Site

Site Name	Code	Distance (km)	Direction from the Site
Special Areas of Conservation (SAC)			
South Dublin Bay	000210	2.8km	NE
Wicklow Mountains	002122	7.5km	S
North Dublin Bay	000206	7.7km	NE
Rockabill to Dalkey Island	003000	9.5km	E
Knocksink Wood	000725	9.7km	S
Glenasmole Valley	001209	10km	SW
Ballyman Glen	000713	11km	S
Howth Head	000202	12.4km	NE
Baldoyle Bay	000199	13.1km	NE
Bray Head	000714	14.9km	SE
Special Protection Area (SPA)			
South Dublin Bay and River Tolka Estuary	004024	2.7km	NE
North Bull Island	004006	6.1km	NE
Wicklow Mountains	004040	7.8km	S
Dalkey Island	004172	9.5km	E
Baldoyle Bay	004016	13km	NE
Howth Head Coast	004113	14km	NE

4.1 Identification of European Sites within Zol

The Zol comprises the area in which the Proposed Development may potentially affect the conservation objectives (or qualifying interests) of a European site. The definition of Zol for the Proposed Development evaluated multiple factors as outlined in Section 2.1 and discussed below. Please note that the extent of Zol differs for different environmental aspects, e.g. air, water, etc.

Habitat Loss / Degradation

The Site is not located within or directly adjacent to any European sites and no designated habitats were identified onsite or within the vicinity of the Site.

The Site is located within a predominately urban/residential area within an existing area of built land and hardstanding. Therefore, it can be stated that there will be no direct impacts associated with designated habitat loss as a result of the amended UGC route.

Therefore, it can be concluded that there will be no direct impacts associated with designated habitat loss/degradation as a result of the Proposed Development. This is based on the lack

of hydrological connection and the intervening lands/distance separating the Site from the European sites.

Water Quality Impairment

Potential water quality impacts would typically be associated with the release of sediment and other pollutants to surface water during the construction phase of the Proposed Development, therefore the Zol would be considered to include the receiving waterbodies adjacent to and downstream of the Site during the construction phase within 5km.

No hydrological connection was identified between the Site and any EPA watercourse or European Site.

In addition, there will be no direct discharges from the Proposed Development to any watercourse during the works and all works will be carried out in accordance with best practice guidelines. Therefore, it can be objectively concluded that the Proposed Development will not result in any likely significant effects on the European sites without taking mitigation measures into account and as such water quality impairment has been screened out from further consideration.

Air Quality Impairment

According to the Institute of Air Quality Management ('IAQM') Guidelines, potential adverse effects from dust arising from construction to ecological receptors occurs within 50m of a construction Site [26]. This is a temporary nuisance impact only.

The closest European site is the South Dublin Bay and River Tolka Estuary SPA which is located ca. 2.7km from the Site. Therefore, it can be concluded that there will be no impacts on designated sites associated with dust that will occur as a result of the Proposed Development.

It is not considered the Proposed Development will result in any significant effect on any European sites as a result of construction dust.

Noise / Disturbance

Noise from the construction activity has the potential to cause disturbance to resting, foraging and commuting qualifying species of the European sites. As there will be no piling or in-river works required for the Proposed Development, there is no potential for underwater noise impacts beyond the immediate vicinity of the Site.

Individual species will provoke different behavioural responses to disturbances at different distances from the source of disturbance.

- Transport Infrastructure Ireland (formally the National Roads Authority) has produced a series of best practice planning and construction guidelines for the treatment of certain protected mammal species (i.e. otter), which indicate that disturbance to terrestrial mammals would not extend beyond 150m [27]; and,
- Studies have noted that different types of disturbance stimuli are characterized by different avifaunal reactions, however, in general, a distance of 300m can be used to represent the maximum likely disturbance distance for waterfowl [28].

The Zol for noise/disturbance is therefore established as the Site with a 300m buffer. All identified European sites are located outside of this zone of influence. Furthermore, there are no suitable habitats for designated species within close proximity to the Site, it can be stated that there is no potential for disturbance/noise impacts to occur on any designated species as a result of the Proposed Development.

Identification of European Sites

The Site is not located within or directly adjacent to any European sites, however, the boundaries of 16 European Sites are located within 15km from the Site.

Given the localised nature of the construction works, distance and intervening lands separating the Site from the European Sites and the lack of impact pathways, it is considered that the Proposed Development will not result in adverse effects to the European Sites listed in Table 4-1 and they have therefore been screened out from further consideration.

4.2 Conservation Objectives

European and national legislation places a collective obligation in Ireland and its citizens to maintain at favourable conservation status areas designated as candidate Special Areas of Conservation. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites.

According to the EU Habitats Directive, favourable conservation status of a habitat is achieved when:

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

The favourable conservation status of a species is achieved when:

- Population data on the species concerned indicate that it is maintaining itself;
- The natural range of the species is neither being reduced nor likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Conservation objectives for all identified Natura 2000 SAC sites are as follows:

‘To maintain or restore the favourable conservation condition of the Annex I habitat(s) and the Annex II species for which the SAC has been selected.’

Conservation objectives for all identified Natura 2000 SPA sites are as follows:

‘To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.’

5 SCREENING AND ASSESSMENT OF POTENTIAL IMPACTS

Using professional experience, guidance and judgement, the following factors have been taken into account in identifying potential significant impacts on the identified European sites:

- Distance from any European Site;
- Qualifying Interests;
- Special Conservation Interests;
- Conservation Objectives;
- The nature of the onsite habitats;
- The location of the Site; and,
- The scale of the Proposed Development.

Based on these factors, **no potential significant impact has been taken forward for further consideration**. This is based on the available information from field and desk-based assessment as outlined in Section 4.

Overall, the screening exercise **did not identify any other factors** that could result in any direct or indirect loss or disturbance to any of the Annex I habitats or Annex I or II species for which the European sites are designated. It can be stated that the Proposed Development will not cause:

- Any reduction in the area of the habitat or European Site;
- Direct or indirect damage to the physical quality of the environment of any European Site;
- Any serious or ongoing disturbance to species or habitats for which any European Site is designated; or,
- Direct or indirect damage to the size, characteristics or reproductive ability of populations any European Site.

On the basis of the Source-Pathway-Receptor (SPR) risk assessment principle, there is no ecological or functional link between the Proposed Development and any European sites.

5.1 Analysis of 'In-Combination' Effects

The Habitats Directive requires competent authorities to make an appropriate assessment of any plan or project which is likely to have a significant effect alone or in combination with other plans and projects.

As described above, the proposed work alone is unlikely to have any direct or indirect adverse effects on any of the European sites located within 15km of the Site.

As outlined in section 1.2, in April 2022, an application was resubmitted to An Bord Pleanála for a SHD at the Site (Planning Ref: ABP31323522). No decision has been made to date. Please refer to Table 5-1.

Table 5-1: Active Planning Applications within the Site

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
ABP31323522	Orchid Residential Limited	Not yet decided	Demolition of existing building on site, construction of 221 no. student	The Appropriate Assessment concluded ' <i>...activities associated with the Proposed Development,</i>

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
			bedspaces and associated site work.	<i>either alone or in-combination with other projects or land uses, will not have any direct or indirect significant effects on the conservation objectives of any Natura 2000 European Designated sites.'</i>

A review of the DLRCC Planning ePlan website did not identify any current or previously granted plans or projects in the immediate vicinity that are considered likely in combination with the Proposed Development to result in significant impacts on European sites [14].

The following planning applications listed in Table 5-2 have been assessed by the Council within the planning system, all of which are located within the vicinity of the Proposed Development.

Table 5-2: Planning Applications within the vicinity of the Site

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
D23A/0565	Sorohan Builders Limited	Granted – 23 rd November 2023	<i>“Retention for a reconfiguration of apartment plan layout, increase floor area and for a rooflight on the north side of the apartment block roof to penthouse apartment number 250 on the 3rd floor level of Core 1 of Block 3 (The Alder) located within the previously permitted development D06A/1510 (An Bord Pleanála reg ref PL06D.222755) on a site of c.2.07 hectares.”</i>	Appropriate Assessment not required.
ABP31317622	The Land Development Agency	Granted – 25 th May 2023	<i>“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</i>	The Appropriate Assessment concluded <i>‘Following the implementation of the mitigation measures outlines, the construction and presence of this development would not be deemed to have a significant impact. No significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of mitigation measures.’</i>

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
			<p>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 sub-divisions/ 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 Annville Grove to provide a pedestrian and cyclist access; Alterations and removal of sections of wall adjacent to Dundrum Road (including removal of existing gates and entrance canopy), including reduction in height 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."</p>	
D22A/0506	The Department of Education	Granted – 23 rd March 2023	<p>"Planning permission for development on a 1.4-hectare site. The proposed development includes the demolition of an existing single-storey building and related structure (c.96.6 sq m) and the provision of a temporary one and two storey post-primary school</p>	<p>Appropriate Assessment Screening completed, and concluded that '...It can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a</p>

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
			comprising 15 no. classrooms (including 4 no. SEN units) and associated teacher and pupil facilities (c. 4,218 sq m gross floor area). The development will include a total of 10 no. car parking spaces; 80 no. bicycle/scooter parking spaces; and 5 no. vehicular drop-off spaces. Vehicular and pedestrian/cycle access to the development will be provided via 2 no. new access gates from Goatstown Road. An additional pedestrian/ cycle access will be facilitated via the existing access from Goatstown Road. The development will also include the provision of a central courtyard play area; an outdoor play area; hard and soft landscaping; boundary treatments; internal roads and pathways; 1 no. external storeroom; 1 no. waste enclosure; piped infrastructure and ducting; ancillary ramps and stairs; changes in level; 1 no. attenuation tank; SuDS features; public lighting; signage; and all ancillary site development and excavation works above and below ground. Temporary permission for a period of 5 years is being sought.”	European site. An appropriate assessment is not, therefore, required.’
ABP30943021	Colbeam Limited	Granted – 3 rd June 2021	“Strategic Housing Development application for 698 no. student bedspace accommodation and associated site works.”	The Appropriate Assessment concluded that the proposed development, individually or in combination with any other plans or projects would not be likely to have a significant effect on screened in European sites. A Stage 2 Appropriate Assessment was not required.
ABP30442019	Durkan Estates Clonskeagh Limited	Annulled	132. no residential units (19 no. houses, 113 no. apartments), childcare facility and associated site works.	Appropriate Assessment Screening Report completed.

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
D20A/0192	The Board of Management of Our Lady's Grove Secondary School	Granted – 9 th September 2020	<i>Permission for development consisting of: the removal of a single storey prefabricated building (102 sqm) and a 10m length of wall to the west of the existing tennis courts; and the construction of a single storey pre-fabricated building (162 sqm) for use as a school changing room; the optional construction of a 181 sqm single storey temporary extension to the east of the school changing room and the use of the entire structure (i.e. 343 sqm, including the change of use of the changing room) as a temporary childcare facility for a period of up to 6 months, after which the temporary extension will be removed and the permanent structure (162 sqm) will be used as a school changing room; provision of all hard and soft landscaping works; infrastructural and all other development works above and below ground.</i>	The Appropriate Assessment Screening Report concluded that <i>'...there is potential for likely significant effects on any European sites.'</i>
D18A/0387 / ABP-302898-18	The Board of Management	Granted – 14 th March 2019	<i>"Permission for development of its sports grounds. The development will consist of the construction of: a synthetic all-weather pitch on an east-west axis; 3 metres high boundary fencings; 58m access road (for maintenance/emergency); changes to levels; hard and soft landscaping works; diversion of services; associated site excavation; infrastructural and all other site development works above and below ground."</i>	No Appropriate Assessment completed.
D18A/0124	Sorohan Builders Limited	Granted – 3 rd May 2018	<i>"Permission for a reconfiguration of layout and increase floor area to penthouse apartment no. 12 on the 4th floor level of Core 1 of Block 2 of previously permitted development Reg. Ref. D06A/1510 (An Bord Pleanála reg. ref. PL06D.222755). Retention</i>	No Appropriate Assessment completed.

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
			<i>permission is also sought for a roof light on the west side of apartment no. 12, including minor elevation revisions to windows and doors."</i>	
D17A/0508	Durkan Estates Clonskeagh Limited	Granted - 16 th November 2017	<i>"The development will consist of ground and first floor level extension to the detached dwelling house permitted as part of Terrace 5 (located to the south of that terrace) by 40.5 sq.m in total (which increases the unit's size to 197.5 sq.m gross floor area proposed from 157 sq.m gross floor area permitted), associated internal and external alterations to the dwelling and a reduction in the dwelling's garden size (from 197 sq.m permitted to 171 sq.m proposed). The proposed development includes associated amendments to the permitted site's hard and soft landscaping and site servicing (foul and surface water drainage and water supply). The development also includes all other site excavation and development works above and below ground."</i>	No Appropriate Assessment completed.
D17A/0305	Sorohan Builders Limited	Granted – 29 th June 2017	<i>"Permission is sought for amendments to previously permitted development reg. ref. D06A/1510 (An Bord Pleanala reg. ref. PL06D.222755) for the addition of a 65 sqm private open space roof patio (in lieu of flat roof) to the fourth floor penthouse apartment No. 39 in Core 3 of Block 2 with associated minor elevational amendments on the east elevation to include a patio access door and window."</i>	No Appropriate Assessment completed.
D16A/0212	Durkan Estates Clonskeagh Limited	Granted - 26 th October 2016	<i>"The development will consist of amendments primary to Terrace 4, Terrace 5, and Block 6, reducing the permitted</i>	No Appropriate Assessment completed.

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
			<p>scheme's total number of residential units by 6 No.</p> <p>The proposed development includes associated amendments to the permitted site's: internal road layout, public and private open space areas, car and bicycle parking spaces, site services (foul and surface water drainage and water supply), and hard and soft landscaping including the provision of boundary treatments. The development also includes all other site excavation and development works above and below ground."</p>	
D15A/0199	Durkan Estates Clonskeagh Limited	Granted – 25 th November 2015	<p>"The development will consist of the redesign of permitted Terrace 1 (which comprised a three-storey building containing 4 no. apartment units and 4 no. duplex units (879 sqm gross floor area permitted)) to provide a four-storey building comprising 16 no. apartments (4 no. one-bed units and 12 no. two-bed units) (1,592 sqm gross floor area proposed). The development will also include; the omission of the permitted ESB substation (30 sqm); an additional 3 no. car parking spaces (73 no. permitted to 76 no. proposed); an additional 15 no. cycle parking spaces (49 no. permitted to 64 no. proposed); bin stores; the provision of SUDs measures, including a green roof; solar panels; associated alterations to the permitted site services (foul and surface water drainage and water supply); associated alterations to hard and soft landscaping works and all other site excavation and development works above and below ground."</p>	No Appropriate Assessment completed.

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
D15A/0324	Durkan Estates Clonskeagh Limited	Granted – 13 th August 2015	<i>“The development of proposed amendments to the 4 no. houses in Terrace 3, resulting in an increase in the size of the permitted houses by 19 sqm each (from 138 sqm permitted to 157 sqm proposed). (There and no alterations proposed to the overall floor size of the previously permitted duplex unit (130 sqm) and apartment unit (95 sqm) in Terrace 3). Planning Permission is also sought for proposed amendments to the elevations and internal layouts of all units in Terrace 3 and alterations to the permitted photovoltaic panels on each house and duplex unit. Planning Permission is also sought for amendments to the provision of private open space for each unit and the minor repositioning of Terrace 3.”</i>	No Appropriate Assessment completed.
D14A/0001	Sorohan Builders Limited	Grated – 2 nd April 2014	<i>“Permission and Retention Permission for amendments to previously permitted development Reg. Ref. D06A/1510 (An Bord Pleanála ref. PL06D.222755). The proposed development will consist of: (A) Planning Permission for the creation of two new pedestrian access points from Goatstown Road, including the provision of associated disability access facilities to serve entrance cores 1 & 2 of apartment Block 1. The provision of entrance canopy structures to serve entrance cores 1 & 2 of apartment Block 1. The provision of entrance canopy structures to serve entrance cores 3 & 4 of apartment Block 1, including the amended arrangement for the stairwell glazing within cores 3 & 4 of apartment Block 1. Minor realignment to the shared surface boulevard and visitors parking to the north</i>	No Appropriate Assessment completed.

Application Ref	Applicant	Decision	Development Description	Appropriate Assessment
			<i>of entrance cores 3 & 4 of apartment Block 1 and including all associated site development works. (B) Retention Permission for the reverse lean-to pitched roof structure element over stairwell to core 3 of apartment Block 1."</i>	

Due to the small scale and short timeframes of both the Proposed Development and the projects listed in Table 5-2, it is considered unlikely to have any cumulative impacts on any European sites in the context of the existing infrastructure and associated activities taking place at the Site.

This statement is supported by:

- I. The distances separating the Site from European sites;
- II. The heavily of the local environment; and,
- III. The small-scale and localised nature of the proposed works.

Taking the above into account, it is concluded that there will not be any significant in-combination contribution by the Proposed Development to possible adverse effects on any European sites.

6 SCREENING CONCLUSIONS AND STATEMENT

The screening process has examined the details of the Proposed Development and has considered the potential for causing adverse effects on European sites and their qualifying features of interests within a 15km radius of the Site.

16 designated sites - the Baldoyle Bay SAC, the Howth Head SAC, the North Dublin Bay SAC, the Rockabill to Dalkey Island SAC, the South Dublin Bay SAC, the Glensmole Valley SAC, the Wicklow Mountains SAC, the Knocksink Wood SAC, the Ballyman Glen SAC, the Bray Head SAC, the Baldoyle Bay SPA, the Howth Head Coast SPA, the North Bull Island SPA, the Dalkey Island SPA, the South Dublin Bay and River Tolka Estuary SPA and the Wicklow Mountains SPA - are located within a 15km radius of the Site. However, given the scale and localised nature of the Proposed Development, and the lack of impact pathways between the Site and European sites, as described in Section 4 and Section 5, it can be concluded that the Proposed Development will not result in any significant impacts either directly or indirectly on the conservation objectives or status of the listed European sites and will not result in the direct loss or disturbance of any Annex I habitats and / or Annex II species for which the European sites are designated.

It has been objectively concluded, following an examination, analysis, and evaluation of the relevant information, that the Developments either alone, or in-combination with other plans, projects or land uses, have not had and will not have any direct or indirect significant effects on any European sites in light of the site's conservation objectives and best scientific knowledge, and no reasonable scientific doubt exists in relation to this conclusion.

Accordingly, the progression to Stage 2 of Appropriate Assessment process (i.e., preparation of a Natura Impact Statement) is not considered necessary.

7 REFERENCES

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