

## Appropriate Assessment Screening for a Proposed Development at Knockrabo, Goatstown, Dublin 14.



29<sup>th</sup> October 2021

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**On behalf of:** Knockrabo Investments DAC

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Document Control Sheet			
Project	Appropriate Assessment Screening for a Proposed Development at Knockrabo, Goatstown, Dublin 14.		
Report	Appropriate Assessment Screening		
Date	29 <sup>th</sup> October 2021		
Version	Author	Reviewed	Date
Draft 01	Bryan Deegan	Robert Farrell	18 <sup>th</sup> March 2021
Draft 02	Bryan Deegan		29 <sup>th</sup> March 2021
Planning	Bryan Deegan		29 <sup>th</sup> October 2021

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## Introduction

The following Appropriate Assessment (AA) (Screening Stage) has been prepared by **Altamar Ltd.** at the request of Knockrabo Investments DAC. The project relates to a proposed development at Knockrabo, Goatstown, Dublin 14.

An Appropriate Assessment is an assessment of the potential effects of a proposed project or plan, on its own, or in combination with other plans or projects, on one or more NATURA 2000 sites. Natura 2000 sites are those sites designated as Special Areas of Conservation (SAC) or Special Protection Areas (SPA).

The AA (screening stage) examines the likely significant effects of a plan or project, either on its own, or in combination with other plans and projects, upon a Natura 2000 site and considers whether, on the basis of objective scientific evidence, it can be concluded that there are no likely significant effects on any European site, in view of best scientific knowledge and the conservation objectives of the relevant European sites.

### Altamar Ltd.

Since its inception in 2001, Altamar has been delivering ecological and environmental services to a broad range of clients. Operational areas include: residential; infrastructural; renewable; oil & gas; private industry; Local Authorities; EC projects; and, State/semi-State Departments. Bryan Deegan, the managing director of Altamar, is an Environmental Scientist and Marine Biologist with 26 years' experience working in Irish terrestrial and aquatic environments, providing services to the State, Semi-State and industry.

Bryan is currently contracted to Inland Fisheries Ireland as the sole "External Expert" to environmentally assess internal and external projects. He is also chair of an internal IFI working group on environmental assessment. Bryan Deegan (MCIEEM) holds a MSc in Environmental Science, BSc (Hons.) in Applied Marine Biology, NCEA National Diploma in Applied Aquatic Science and a NCEA National Certificate in Science (Aquaculture). Bryan Deegan carried out all elements of this Appropriate Assessment Screening.

## Background to the Appropriate Assessment

The Habitats Directive (92/43/EEC), together with the Birds Directive (2009/1477/EC), forms the cornerstone of European nature conservation policy. The Directive protects over 1000 animals and plant species and over 200 "habitat types" which are of European importance. In the Directive, Articles 3 to 9 provide the legislative means to protect habitats and species of European Community interest through the establishment and conservation of an EU-wide network of conservation sites (NATURA 2000).

These are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive. Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect NATURA 2000 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 component 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."*

Furthermore, as outlined in the EC guidance document on Article 6(4) (January 2007)<sup>1</sup>:

*"Appropriate assessments of the implications of the plan or project for the site concerned must precede its approval and take into account the cumulative effects which result from the combination of that plan or project with other plans or projects in view of the site's conservation objectives. This implies that all aspects of the plan or project which can, either individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field."*

*Assessment procedures of plans or projects likely to affect NATURA 2000 sites should guarantee full consideration of all elements contributing to the site integrity and to the overall coherence of the network, both in the definition of the baseline conditions and in the stages leading to identification of potential impacts, mitigation measures and residual impacts. These determine what has to be compensated, both in quality and quantity. Regardless of whether the provisions of Article 6(3) are delivered following existing environmental impact assessment procedures or other specific methods, it must be ensured that:*

- *Article 6(3) assessment results allow full traceability of the decisions eventually made, including the selection of alternatives and any imperative reasons of overriding public interest.*
- *The assessment should include all elements contributing to the site's integrity and to the overall coherence of the network as defined in the site's conservation objectives and Standard Data Form, and be based on best available scientific knowledge in the field. The information required should be updated and could include the following issues:*
  - *Structure and function, and the respective role of the site's ecological assets;*
  - *Area, representativity and conservation status of the priority and nonpriority habitats in the site;*
  - *Population size, degree of isolation, ecotype, genetic pool, age class structure, and conservation status of species under Annex II of the Habitats Directive or Annex I of the Birds Directive present in the site;*

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<sup>1</sup> European Commission. (2007). Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission.

- *Role of the site within the biographical region and in the coherence of the NATURA 2000 network; and,*
- *Any other ecological assets and functions identified in the site.*
- *It should include a comprehensive identification of all the potential impacts of the plan or project likely to be significant on the site, taking into account cumulative impacts and other impacts likely to arise as a result of the combined action of the plan or project under assessment and other plans or projects.*
- *The assessment under Article 6(3) applies the best available techniques and methods, to estimate the extent of the effects of the plan or project on the biological integrity of the site(s) likely to be damaged.*
- *The assessment provides for the incorporation of the most effective mitigation measures into the plan or project concerned, in order to avoid, reduce or even cancel the negative impacts on the site.*
- *The characterisation of the biological integrity and the impact assessment should be based on the best possible indicators specific to the NATURA 2000 assets which must also be useful to monitor the plan or project implementation.”*

## Methodology

This Appropriate Assessment screening was undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2001), Part XAB of the Planning and Development Act 2000, as amended, in addition to the December 2009 publication from the Department of Environment, Heritage and Local Government; 'Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities', the European Communities (Birds and Natural Habitats) Regulations 2011 and the provision of Article 6 of the Habitats Directive 92/43/EEC (European Commission, 21 November 2018 and Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

In order to comply with the above Guidelines and legislation, the Appropriate Assessment Screening process must be structured as follows:

- Description of the proposed project or plan;
- Identification of NATURA 2000 sites potentially affected;
- Identification and description of individual and in combination effects likely to result from the proposed project;
- Assessment of the likely significance of the effects identified above. Exclusion of sites where it can be objectively concluded that there will be no likely significant effects; and,
- Conclusions.

## Stage 1 Screening Assessment

### Management of the Site

The plan or project is not directly connected with, or necessary to the management of NATURA 2000 sites.

### Description of the Proposed Project

Knockrabo Investments DAC intend to apply to An Bord Pleanála for permission for a Strategic Housing Development with a total application site area of c. 1.78 ha, on a site located at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.

The proposed development relates to Phase 2 of the development on the 'Knockrabo' lands. Phase 1 of 'Knockrabo' was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 125 no. units. The proposed development will consist of the amendment of the permitted 'Phase 2' residential development of 93 no. units, childcare facility and community/leisure uses (DLRCC Reg. Ref. D17A/1124) on a site of 2.75ha. The proposed development will provide for the reconfiguration and redesign of the approved residential development. The Knockrabo Way entrance road (constructed and unconstructed), the renovation of Cedar Mount House including childcare facility and community/leisure uses, the Coach House, Gate Lodge (West), the Gate House and all associated landscaping permitted under D17A/1124 which are outside the boundary of the current application are proposed to remain as previously granted.

The site is bounded to the south-east by Mount Anville Road; to the south by 'Mount Anville Lodge' and by the rear boundaries of 'Thendara' (a Protected Structure – RPS Ref. 812), 'The Garth' (a Protected Structure – RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development 'Knockrabo'. There are 3 no. Protected Structures located in the overall 'Knockrabo' landholding, but which are outside the application boundary. These include 'Cedar Mount' (a Protected Structure - RPS Ref. 783), 'Knockrabo Gate Lodge (West)' (a Protected Structure - RPS Ref. 796), including Entrance Gates and Piers, and 'Knockrabo Gate Lodge (East)' (a Protected Structure – RPS 740) including Entrance Gates and Piers. For clarity no works are proposed to any Protected Structures as part of this proposed development.

The development, with a total gross internal area of c. 23,097.2 sqm, will consist of the construction of 227 no. residential units in 4 no. apartment blocks ranging in height from Part 2 – Part 8 storeys including semi-basement podium. The development will provide 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units as follows:

- Block E (c. 1015.3 sqm GIA) is a 5-storey including semi-basement podium apartment block comprising of 8 no. units (1 no. one bed unit and 7 no. 2 bed units).
- Block F (c. 8042.2 sqm GIA) is a Part 2 to Part 8 storeys including semi-basement podium apartment block comprising 84 no. units (53 no. 1 bed units and 31 no. 2 bed units).
- Block G (c. 8626.5 sqm GIA) is a Part 6 including semi-basement podium to Part 8 storey including semi-basement podium apartment block comprising of 82 no. units (37 no. 1 bed units, 40 no. 2 bed units and 5 no. 3 bed units).
- Block H (c. 5413.7 sqm GIA) is a Part 6 to Part 7 storey apartment block including semi-basement podium comprising 53 no. units (7 no. 1 bed units, 45 no. 2 bed units and 1 no. 3 bed unit).

Residential Tenant Amenities comprising c. 537.2 sqm are provided at Level 00 of Block G and H to serve all residential units within this application. Balconies/Wintergardens are provided on all elevations at all levels for the 4 no. apartment blocks, with (Private) Terraces provided at top floor levels and a communal Roof Terrace of c. 198 sqm to be provided on Block F. The development will also provide 178 no. car parking spaces, which

comprises 125 no. residential podium parking spaces, 35 no. on-street parking spaces, 16 no. visitor/drop off parking and 2 no. car sharing on-street parking spaces are provided; Provision of 389 no. private residential bicycle parking spaces and 130 no. visitor bicycle parking spaces; Provision of 12 no. motorcycle parking spaces.

All other ancillary site development works to facilitate construction, site services, piped infrastructure, 2 no. sub-stations, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground. The development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass. The development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960).

No Natura 2000 sites are within the potential Zone of Influence (Zoi). The Zoi of the proposed project would seem to be restricted to the site outline with potential for minor localised noise, dust and light impacts during construction. Drainage from site, both foul and surface water, would be seen as the outputs from the site during construction and operation that could potentially extend the potential Zoi. However, the proposed development has no direct hydrological link to a Natura 2000 site.

### **Hydrological and Hydrogeological Qualitative Risk Assessment**

AWN have carried out a Hydrological and Hydrogeological Qualitative Risk Assessment for the proposed Residential Development located at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. The report concludes *"A conceptual site model (CSM) has been prepared following a desk top review of the site and surrounding environs. Based on this CSM, plausible Source-Pathway-Receptor linkages have been assessed assuming an absence of any measures intended to avoid or reduce harmful effects of the proposed project (i.e. mitigation measures) in place at the proposed development site.*

*There is no direct source pathway linkage between the proposed development site and open water (i.e. South Dublin Bay SAC/pNHA and South Dublin Bay and River Tolka SPA). There are indirect source pathway linkages from the proposed development through public sewers which discharge to the Elm Park Stream which ultimately outfalls into Dublin Bay (2.7 km downgradient of the site). There is also an indirect connection through the foul sewer which will eventually discharge to the Ringsend WWTP and ultimately discharges to Dublin Bay. The future development has a peak foul discharge that would equate to 0.063% of the licensed discharge at Ringsend WWTP (peak hydraulic capacity).*

*It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura 2000 sites within Dublin Bay.*

*Finally, in line with good practice, preventive measures are included during construction to minimise the potential for any accidental releases off site. These measures are to be included in the design of any such developments. During operation, the potential for an impact to ground or storm water is negligible and there are design measures incorporated within the proposed development to manage stormwater run-off quality. These specific measures will provide further protection to the receiving soil and water environments. However, the protection of downstream European sites is in no way reliant on these measures."* It should be noted that these are not mitigation measures, they are standard measures for all projects of this kind which would be included into the project regardless of the existence of the EU Site.



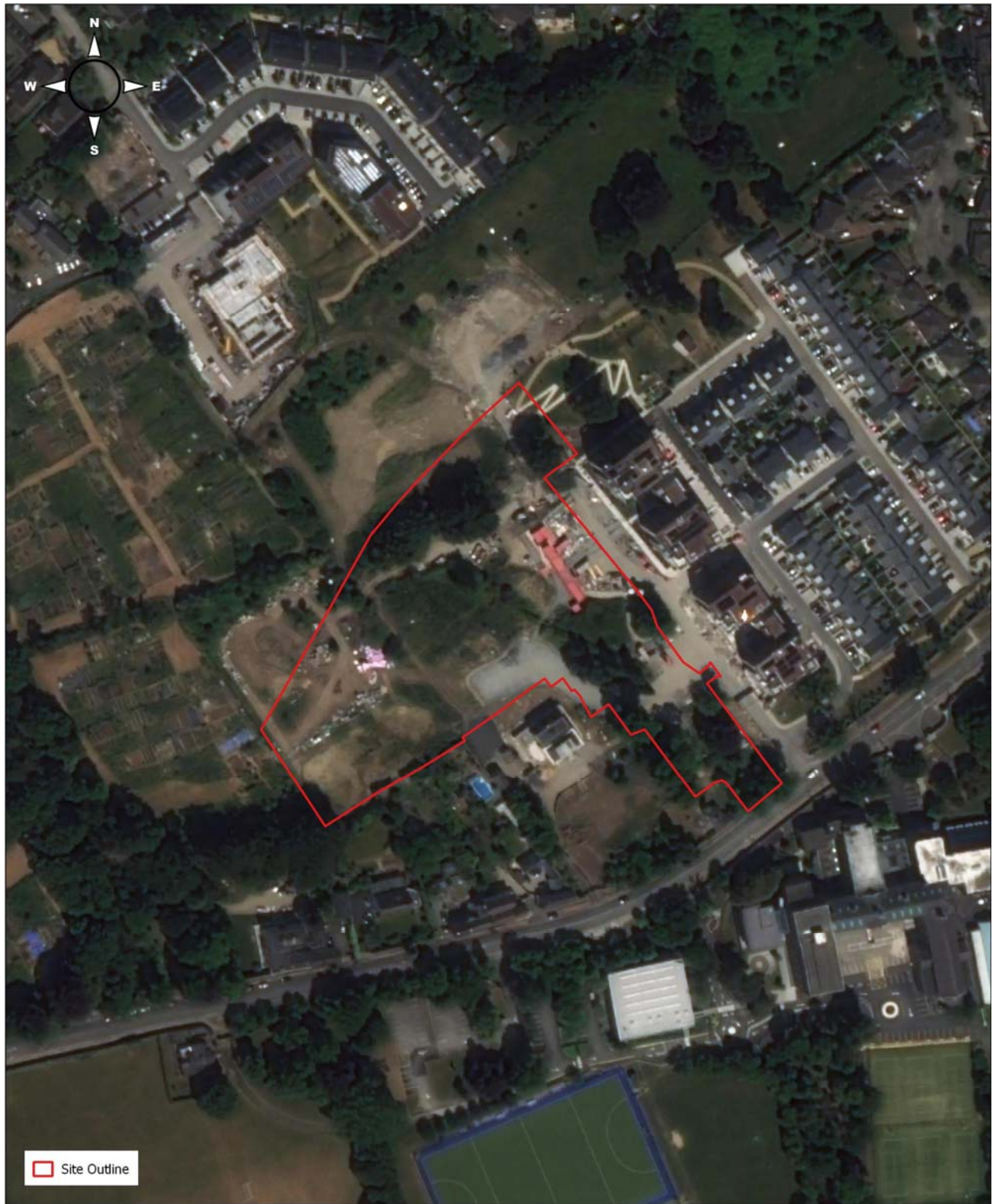


Project: Knockrabo Residential  
 Location: Goatstown  
 Date: 26th February, 2021  
 Drawn By: Bryan Deegan (Altemar)

**ALTEMAR**  
 Marine & Environmental Consultancy



Figure 1. Site Context Map



0 50 100 150 200 250 m

Project: Knockrabo Residential  
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 Date: 26th February, 2021  
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Figure 2. Subject site (outlined in red)



Figure 3. Proposed Site Layout



## Drainage

Waterman Moylan Engineering Consultants have prepared an Engineering Assessment Report for the proposed residential development at Knockrabo, Goatstown, Co. Dublin. The report provides details on the proposals for surface water drainage and foul drainage on the subject site, as part of the proposed development. Details of the proposed foul and surface water systems are provided below.

### Foul Water

In terms of the existing foul drainage, the report states that:

*“There is an existing 225mm diameter foul sewer outfall in the northeast of the subject site which was constructed under Phase 1 of the Knockrabo development and was built to drain the Phase 1 lands.”*

Regarding the proposals for foul water drainage, the report states that:

*“All foul drainage on the subject lands is proposed to drain via gravity to this existing on-site foul outfall.”*

*“A Pre-Connection Enquiry form was submitted to Irish Water in October 2020 (CDS21002520), which outlined the above foul water discharge proposal. A response Confirmation of Feasibility (CoF) Letter was received from Irish Water dated 10 June 2021 confirming that subject to a valid connection agreement, the proposed connection to the foul water sewer is feasible without an upgrade. The CoF is appended as Annex G.*

*A detailed drawing submission was subsequently made to Irish Water for both foul and water supply design. In response, Irish Water have issued a letter of design acceptance stating that there are no objections to the proposals.”*

*“The proposed foul water outfall from the development is a 225mm diameter pipe laid at a gradient of 1:100, giving a capacity of 45.6 l/s. Therefore, the proposed outfall pipe has more than adequate capacity to cater for the flows from the development.” “Drains to the apartment blocks will be laid to comply with the Building Regulations 2010, and in accordance with the recommendations contained in the Technical Guidance Documents, Section H. Foul water sewers outside the basement will consist of uPVC or concrete socket and spigot pipes (to IS 6) and will be laid strictly in accordance with Irish Waters code of practice for Wastewater Infrastructure and Dun-Laoghaire Rathdown County Council requirements for taking in charge.”*

### Surface Water

The proposed surface water strategy is outlined below:

*“It is proposed to drain surface water from the development by gravity to the existing public surface water drainage outfall pipe in the north eastern corner of the development site. Storm water will discharge to the outfall at a controlled rate, limited to the greenfield equivalent runoff. Excess surface water runoff during storm events will be attenuated in new below ground stormwater attenuation tanks within the open space at the northern end of the site’ (Figures 5 & 6).*

*“It is proposed to incorporate a Storm Water Management Plan through the use of various SuDS techniques to treat and minimise surface water runoff from the site. The methodology involved in developing a Storm Water Management Plan for the subject site is in accordance with the requirements of Dun-Laoghaire Rathdown County Council and is based on recommendations set out in the Greater Dublin Strategic Drainage Study (GDSDS) and in the SuDS Manual (Ciria C753). Based on three key elements – Water Quantity, Water Quality and Amenity – the targets of the SuDS train concept have been implemented in the design, providing SuDS devices for each of the following:*

- Source Control – Green roofs
- Site Control – Permeable paving; bio-retention tree pits; filter drains; bio-retention swales
- Regional Control – Flow control; underground attenuation storage; downstream defender.”

It should be noted that these are not mitigation measures, they are standard design measures which would be included into the project regardless of the existence of the EU Site.

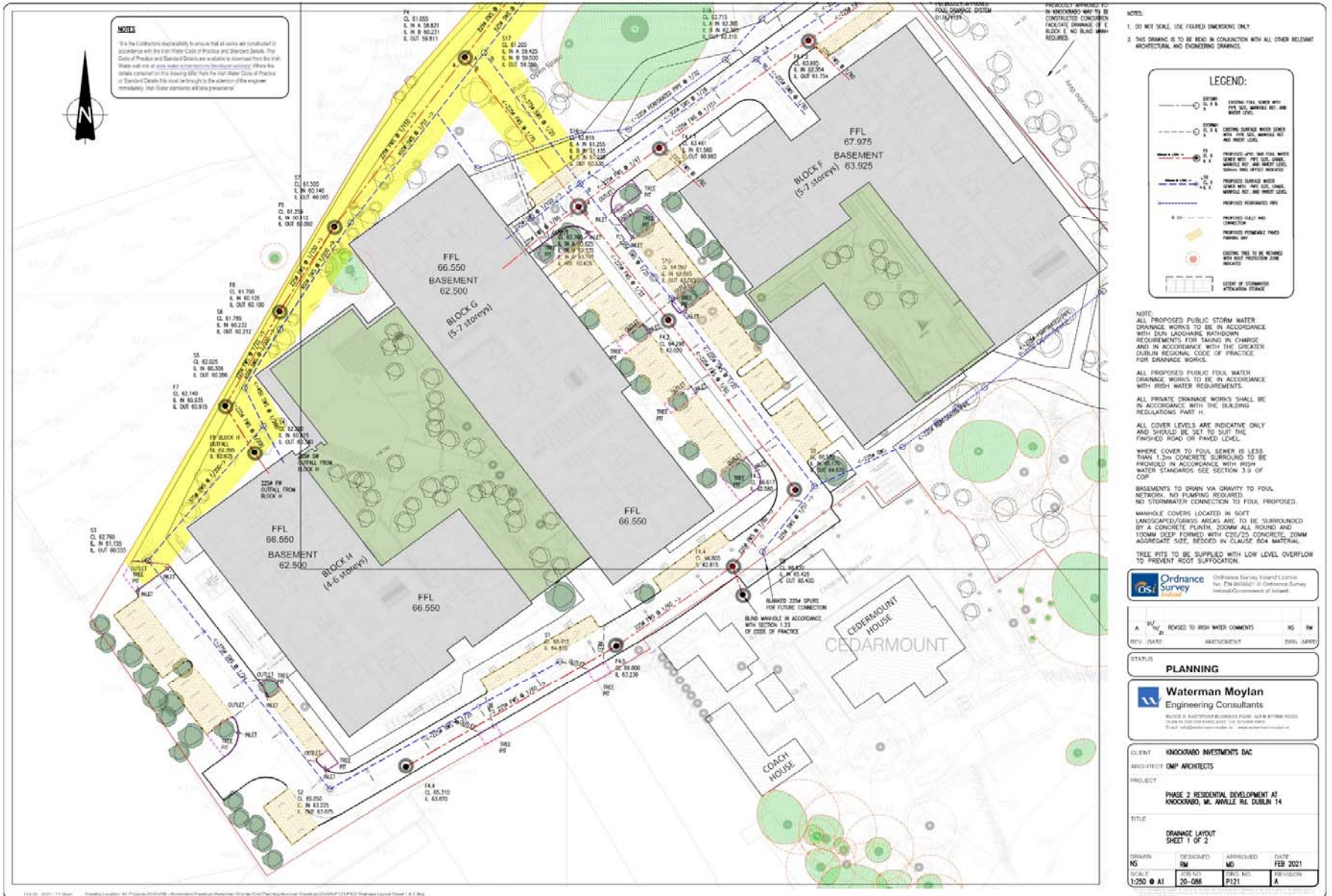


Figure 5. Proposed drainage layout 1

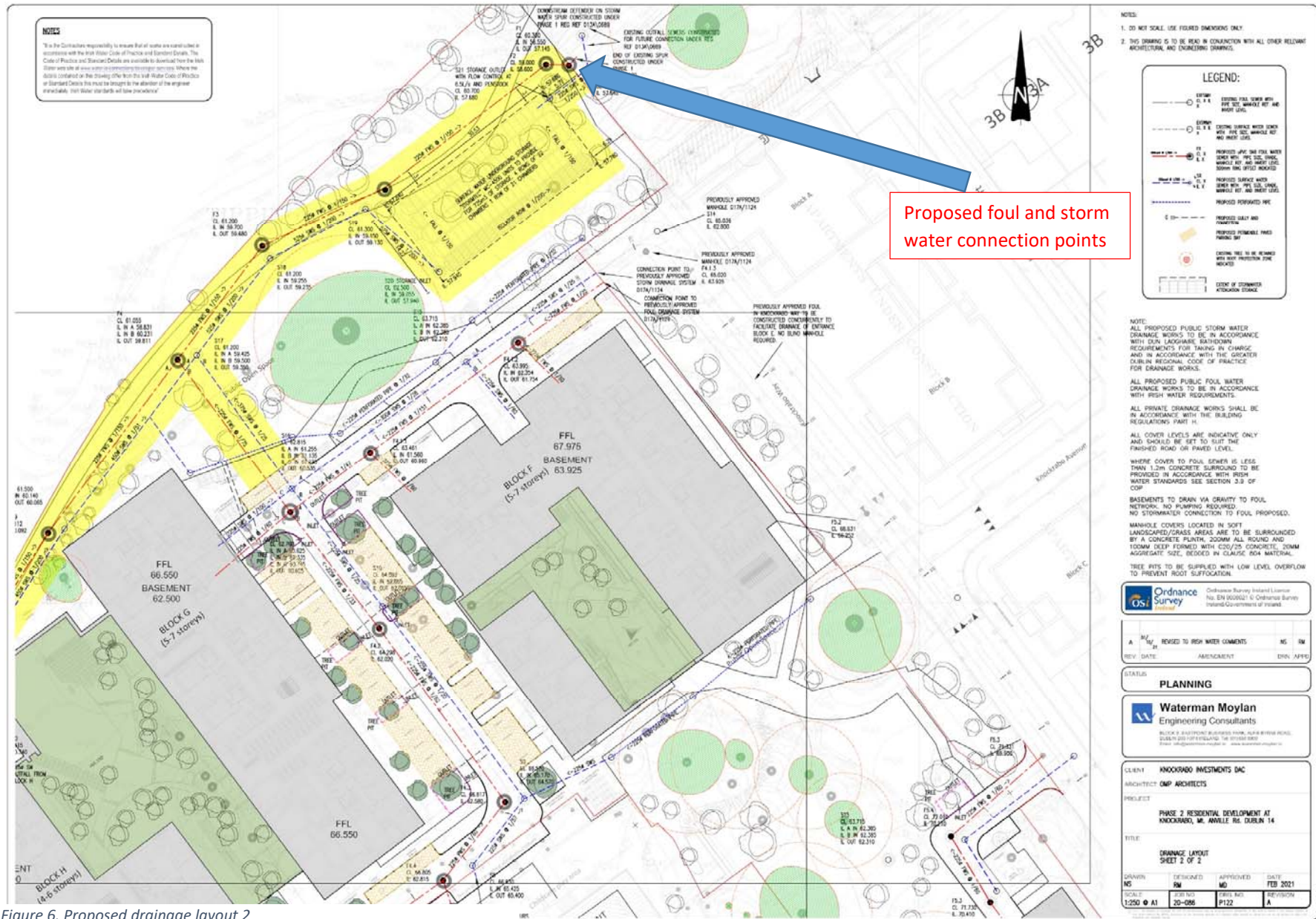


Figure 6. Proposed drainage layout 2

## Identification of Relevant Natura 2000 Sites

The proposed works are not within a NATURA 2000 site. The NATURA 2000 sites within 15km are seen in Figures 7 & 8 and Table 1. Their features of interest and the potential impact of the works on the features of interest, are seen in Table 2. No Natura 2000 sites are deemed to be in the potential Zone of Influence (Zoi). However, following the precautionary principle further screening of all Natura 2000 within 15km (Table 1) is carried out in Table 2. There is no direct or indirect pathway to Natura 2000 sites beyond 15km.

Table 1. Proximity to designated sites of conservation importance

Code	NATURA 2000 Site	Distance	Direct Hydrological / Biodiversity Connection
<b>Special Areas of Conservation</b>			
IE0000210	South Dublin Bay SAC	2.5 km	No
IE0002122	Wicklow Mountains SAC	7.3 km	No
IE0000206	North Dublin Bay SAC	7.4 km	No
IE0003000	Rockabill to Dalkey Island SAC	8.8 km	No
IE000725	Knocksink Wood SAC	9.1 km	No
IE001209	Glenasmole Valley SAC	10.2 km	No
IE000713	Ballyman Glen SAC	10.2 km	No
IE0000202	Howth Head SAC	11.8 km	No
IE000199	Baldoyle Bay SAC	12.9 km	No
IE000714	Bray Head SAC	14.0 km	No
<b>Special Protection Area</b>			
IE0004024	South Dublin Bay and River Tolka Estuary SPA	2.4 km	No
IE0004006	North Bull Island SPA	7.4 km	No
IE0004040	Wicklow Mountains SPA	7.5 km	No
IE0004172	Dalkey Islands SPA	8.7 km	No
IE0004016	Baldoyle Bay SPA	12.9 km	No
IE0004113	Howth Head Coast SPA	13.7 km	No

The initial screening of NATURA 2000 sites within 15km of the subject site, their features of interest and the Source/Pathway/Receptor links between the works and the Natura 2000 site, with the potential to result in adverse effects (without mitigation measures) on each NATURA 2000 site and features of interest, are seen in Table 2.

Table 2. Initial screening of NATURA 2000 sites within 15km and NATURA 2000 sites within 15km with potential of hydrological connection to the proposed development

NATURA Code	Name	Screened IN/OUT	Details/Reason
<b>Special Areas of Conservation</b>			
IE000210	South Dublin Bay SAC	<b>Out</b>	<p><b>Conservation Objectives</b></p> <p>To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in South Dublin Bay SAC, which is defined by the following targets:</p> <ul style="list-style-type: none"> <li>• The permanent habitat area is stable or increasing, subject to natural processes.</li> <li>• Maintain the extent of the <i>Zostera</i> –dominated community, subject to natural processes.</li> <li>• Conserve the high quality of the <i>Zostera</i> –dominated community, subject to natural processes</li> <li>• Conserve the following community type in a natural condition: Fine sands with <i>Angulus tenuis</i> community complex.</li> </ul> <p><b>Features of Interest</b></p> <p>[1140] Mudflats and sandflats not covered by seawater at low tide            [1210] Annual vegetation of drift lines</p>



			<p>[1310] Salicornia and other annuals colonising mud and sand</p> <p>[2110] Embryonic shifting dunes</p> <p><b>Potential Impact</b> The development site is located within a suburban area 2.5 km from this SAC. This SAC is coastal in nature and its features of interest are coastal habitats. The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a likely significant effect on the Natura 2000 site.</p> <p>As outlined in the Hydrological &amp; Hydrogeological Risk Assessment “It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.” The construction and operation of the proposed development will not impact on the conservation interests of the site. No significant effects are likely from the proposed project. <b>No significant effects are likely.</b></p>
IE002122	Wicklow Mountains SAC	<b>Out</b>	<p><b>Conservation Objectives</b> To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p> <p><b>Features of Interest</b> Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or Isoeto-Nanojuncetea [3130] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] European dry heaths [4030] Apine and Boreal heaths [4060] Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (if active bog) [7130] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] <i>Lutra lutra</i> (Otter) [1355]</p> <p><b>Potential Impact</b> The development site is located 7.3 km from the Wicklow Mountains SAC. The development does not have a direct or indirect connection or pathway to the SAC. The SAC is located inland and the features of interest are terrestrial habitats and a mammal. The proposed development would not impact on the features of interest or the conservation objectives of this SAC.</p>

			<b>No significant effects are likely.</b>
IE000206	North Dublin Bay SAC		<p><b>Conservation Objectives:</b> To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p> <p><b>Features of Interest</b> 1140 Mudflats and sandflats not covered by seawater at low tide 1210 Annual vegetation of drift lines 1310 Salicornia and other annuals colonising mud and sand 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) 1395 Petalwort (<i>Petalophyllum ralfsii</i>) 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 2110 Embryonic shifting dunes 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes) 2190 Humid dune slacks</p> <p><b>Source/Pathway/Receptor links between the works and the Natura 2000 site, with the potential to result in significant adverse effects.</b> The development site is located within a suburban area 7.4 km from this SAC. This SAC is coastal in nature and its features of interest are terrestrial habitats.</p> <p>This SAC is coastal in nature and its features of interest are coastal habitats. The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a significant effect on the Natura 2000 site.</p> <p>As outlined in the Hydrological &amp; Hydrogeological Risk Assessment <i>“It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.”</i> The construction and operation of the proposed development will not impact on the conservation interests of the site. No significant effects are likely from the proposed project.</p> <p><b>No significant effects likely</b></p>
IE003000	Rockabill to Dalkey Island SAC	<b>Out</b>	<p><b>Conservation Objectives</b> To maintain the favourable conservation condition of Reefs and Harbour porpoise, in Rockabill to Dalkey Island SAC, which is defined by the following list of targets:</p> <ul style="list-style-type: none"> <li>• The permanent habitat area is stable or increasing, subject to natural processes.</li> <li>• Distribution of habitat is stable or increasing, subject to natural processes.</li> </ul>

			<ul style="list-style-type: none"> <li>• Conserve the following community types in a natural condition: Intertidal reef community complex; and Subtidal reef community complex.</li> <li>• Porpoise range within site should not be restricted by artificial barriers to site use.</li> <li>• Human activities should occur at levels that do not adversely affect the harbour porpoise community at the site.</li> </ul> <p><b>Feature of Interest</b> Reefs [1170] <i>Phocoena phocoena</i> (Harbour porpoise) [1351]</p> <p><b>Potential Impact</b> The development site is located within a suburban area 8.8 km from this SAC. This SAC is marine in nature and its features of interest are a marine habitat and marine mammal. This SAC is coastal in nature and its features of interest are coastal habitats. The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a significant effect on the Natura 2000 site.</p> <p>As outlined in the Hydrological &amp; Hydrogeological Risk Assessment “It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.” The construction and operation of the proposed development will not impact on the conservation interests of the site. No significant effects are likely from the proposed project.</p> <p><b>No significant effects are likely.</b></p>
IE001209	Knocksink Wood SAC	<b>Out</b>	<p><b>Conservation Objectives</b> To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected</p> <p><b>Features of Interest</b> Petrifying springs with tufa formation (Cratoneurion) [7220] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0].</p> <p><b>Potential Impact</b> The development is 9.1 km from the Knocksink Wood SAC. The development has no direct or indirect hydrological connection to this SAC that is located at a higher elevation. The proposed development would not impact on the features of interest or the conservation objectives of this SAC.</p> <p><b>No significant effects are likely.</b></p>
IE001209	Glenasmole Valley SAC		<p><b>Conservation Objectives</b></p>

			<p>To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p> <p><b>Qualifying Interests</b>  (6210) Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)  (6410) Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)  (7220) Petrifying springs with tufa formation (<i>Cratoneurion</i>)</p> <p><b>Source/Pathway/Receptor links between the works and the Natura 2000 site, with the potential to result in significant adverse effects.</b>  The development site is located 10.2 km from the Glenasmole Valley SAC. The development does not have a direct or indirect connection or pathway to the SAC. The SAC is located inland and the features of interest are terrestrial habitats. The proposed development would not impact on the features of interest or the conservation objectives of this SAC.</p> <p><b>No significant effects are likely</b></p>
IE000713	Ballyman Glen SAC	<b>Out</b>	<p><b>Conservation Objectives</b>  To maintain or restore the favourable conservation condition of Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p> <p><b>Features of Interest</b>  Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]  Alkaline fens [7230]</p> <p><b>Potential Impact</b>  The development is 10.2 km from the Ballyman Glen SAC. The development has no direct or indirect hydrological connection to this SAC that is located at a higher elevation. The proposed development would not impact on the features of interest or the conservation objectives of this SAC.</p> <p><b>No significant effects are likely.</b></p>
IE0000202	Howth Head SAC		<p><b>Conservation Objectives</b>  To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p> <p><b>Qualifying Interests</b>  (1230) Vegetated sea cliffs of the Atlantic and Baltic coasts  (4030) European dry heaths</p> <p><b>Source/Pathway/Receptor links between the works and the Natura 2000 site, with the potential to result in significant adverse effects.</b>  The development site is located within a suburban area 11.8 km from the Howth Head SAC. This SAC is coastal in nature and its features of interest are terrestrial habitats.</p> <p>There is no direct pathway from this site to the SAC or indirect pathway to the features of interest. The construction and</p>

			<p>operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p>
IE000199	Baldoyle Bay SAC	Out	<p><b>Conservation Objectives:</b> To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.</p> <p><b>Qualifying Interests</b> 1140 Mudflats and sandflats not covered by seawater at low tide 1310 Salicornia and other annuals colonizing mud and sand 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)</p> <p><b>Potential Impact</b> The development site is located within a suburban area approximately 12.9 km from the Baldoyle Bay SAC</p> <p>No potential impact is foreseen. There is no direct or indirect pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely</b></p>
IE000714	Bray Head SAC	Out	<p><b>Conservation Objectives</b> To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected</p> <p><b>Features of Interest</b> Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030]</p> <p><b>Potential Impact</b> The development site is in a rural area 14.0 km from the Bray Head SAC. This SAC is coastal in nature and its features of interest are terrestrial habitats.</p> <p>No potential impact is foreseen. There is no direct or indirect pathway from this site to the SAC. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely.</b></p>
<b>Special Protection Areas</b>			
IE004024	South Dublin Bay and River Tolka Estuary SPA	Out	<p><b>Conservation Objectives</b> To maintain or restore the favourable conservation condition of the bird species listed as Conservation Interests for this SPA.</p> <p>To maintain the favourable conservation condition of the wetland habitat in South Dublin Bay and River Tolka Estuary SPA as a resource for the regularly occurring migratory waterbirds that utilise it.</p> <p><b>Features of Interest</b> <i>Branta bernicla hrota</i> (Light-bellied Brent Goose) [A046]</p>

		<p><i>Haematopus ostralegus</i> (Oystercatcher) [A130]  <i>Charadrius hiaticula</i> (Ringed Plover) [A137]  <i>Pluvialis squatarola</i> (Grey Plover) [A141]  <i>Calidris canutus</i> (Knot) [A143]  <i>Calidris alba</i> (Sanderling) [A144]  <i>Calidris alpina</i> (Dunlin) [A149]  <i>Limosa lapponica</i> (Bar-tailed Godwit) [A157]  <i>Tringa totanus</i> (Redshank) [A162]  <i>Chroicocephalus ridibundus</i> (Black-headed Gull) [A179]  <i>Sterna dougallii</i> (Roseate Tern) [A192]  <i>Sterna hirundo</i> (Common Tern) [A193]  <i>Sterna paradisaea</i> (Arctic Tern) [A194]  Wetland and Waterbirds [A999]</p> <p><b>Potential Impact</b>  The development site is located 2.4 km from the South Dublin Bay and River Tolka Estuary SPA. This SPA and its features of interest are marine based. The site is not an important foraging or roosting area for these species.</p> <p>The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a significant effect on the Natura 2000 site.</p> <p>As outlined in the Hydrological &amp; Hydrogeological Risk Assessment <i>“It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.”</i> The construction and operation of the proposed development will not impact on the conservation interests of the site. No significant effects are likely from the proposed project.</p> <p>No potential impact is foreseen. There is no direct pathway from this site to the SPA. The construction and operation of the proposed development will not impact on the conservation interests of the site.</p> <p><b>No significant effects are likely.</b></p>
IE0004006	North Bull Island SPA	<p><b>Conservation Objective:</b>  To maintain or restore the favourable conservation conditions of the species and/or habitats listed as Qualifying Interests for this SPA.</p> <p><b>Qualifying Interests</b>  A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)  A048 Shelduck (<i>Tadorna tadorna</i>)  A052 Teal (<i>Anas crecca</i>)  A054 Pintail (<i>Anas acuta</i>)  A056 Shoveler (<i>Anas clypeata</i>)</p>

			<p>A130 Oystercatcher (<i>Haematopus ostralegus</i>)  A140 Golden Plover (<i>Pluvialis apricaria</i>)  A141 Grey Plover (<i>Pluvialis squatarola</i>)  A143 Knot (<i>Calidris canutus</i>)  A144 Sanderling (<i>Calidris alba</i>)  A149 Dunlin (<i>Calidris alpina alpina</i>)  A156 Black-tailed Godwit (<i>Limosa limosa</i>)  A157 Bar-tailed Godwit (<i>Limosa lapponica</i>)  A160 Curlew (<i>Numenius arquata</i>)  A162 Redshank (<i>Tringa tetanus</i>)  A169 Turnstone (<i>Arenaria interpres</i>)  A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>)  A999 Wetlands</p> <p><b>Source/Pathway/Receptor links between the works and the Natura 2000 site, with the potential to result in significant adverse effects.</b>  The proposed development site is located 7.4 km from the North Bull Island SPA.</p> <p>The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a significant effect on the Natura 2000 site.</p> <p>As outlined in the Hydrological &amp; Hydrogeological Risk Assessment <i>“It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.”</i> The construction and operation of the proposed development will not impact on the conservation interests of the site. No significant effects are likely from the proposed project.</p> <p><b>No significant effects are likely</b></p>
IE004040	Wicklow Mountains SPA	<b>Out</b>	<p><b>Conservation Objectives</b>  To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p> <p><b>Features of Interest</b>  <i>Falco colombarius</i> (Merlin) [A098]  <i>Falco peregrinus</i> (Peregrine) [A103]</p> <p><b>Potential Impact</b>  The site is 7.5 km from the Wicklow Mountains SPA. The development site is not an important foraging or roosting area for these species. There is no direct or indirect pathway to this Natura 2000 site.</p> <p><b>No significant effects are likely.</b></p>

IE004172	Dalkey Islands SPA	Out	<p><b>Conservation Objectives</b> To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p> <p><b>Features of Interest</b> <i>Sterna dougallii</i> (Roseate Tern) [A192] <i>Sterna hirundo</i> (Common Tern) [A193] <i>Sterna paradisaea</i> (Arctic Tern) [A194]</p> <p><b>Potential Impact</b> The development site is located 8.7 km from the Dalkey Islands SPA. The features of interest of this SPA are summer migratory bird species and the site is not an important foraging or roosting area for these species. The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a significant effect on the Natura 2000 site.</p> <p>As outlined in the Hydrological &amp; Hydrogeological Risk Assessment “<i>It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.</i>”</p> <p>The construction and operation of the proposed development will not impact on the conservation interests of the site. No significant effects are likely from the proposed project.</p> <p><b>No significant effects are likely.</b></p>
IE0004016	Baldoyle Bay SPA	Out	<p><b>Conservation Objectives:</b> The maintenance of habitats and species within Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.</p> <p><b>Qualifying Interests</b> A046 Brent Goose (<i>Branta bernicla hrota</i>) A048 Shelduck (<i>Tadorna tadorna</i>) A137 Ringed Plover (<i>Charadrius hiaticula</i>) A140 Golden Plover (<i>Pluvialis apricaria</i>) A141 Grey Plover (<i>Pluvialis squatarola</i>) A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) A999 Wetlands</p> <p><b>Potential Impact</b> The proposed development site is 12.9 km from the River Nanny and Shore SPA. There is no direct or indirect pathway from the proposed site to the SPA. As a result, no impact on this SPA or its features of interest is foreseen. No significant effect is foreseen from direct or indirect pathways. The works will not impact on the conservation interests of this SPA.</p>



			<b>No significant effects are likely</b>
IE0004113	Howth Head Coast SPA		<p><b>Conservation Objective:</b> To maintain or restore the favourable conservation conditions of the species and/or habitats listed as Qualifying Interests for this SPA.</p> <p><b>Qualifying Interests</b> A188 Kittiwake (<i>Rissa tridactyla</i>)</p> <p><b>Source/Pathway/Receptor links between the works and the Natura 2000 site, with the potential to result in significant adverse effects.</b> The proposed development site is located 13.7 km from the SPA. There is no direct or indirect pathway to this SPA</p> <p><b>No significant effects are likely</b></p>

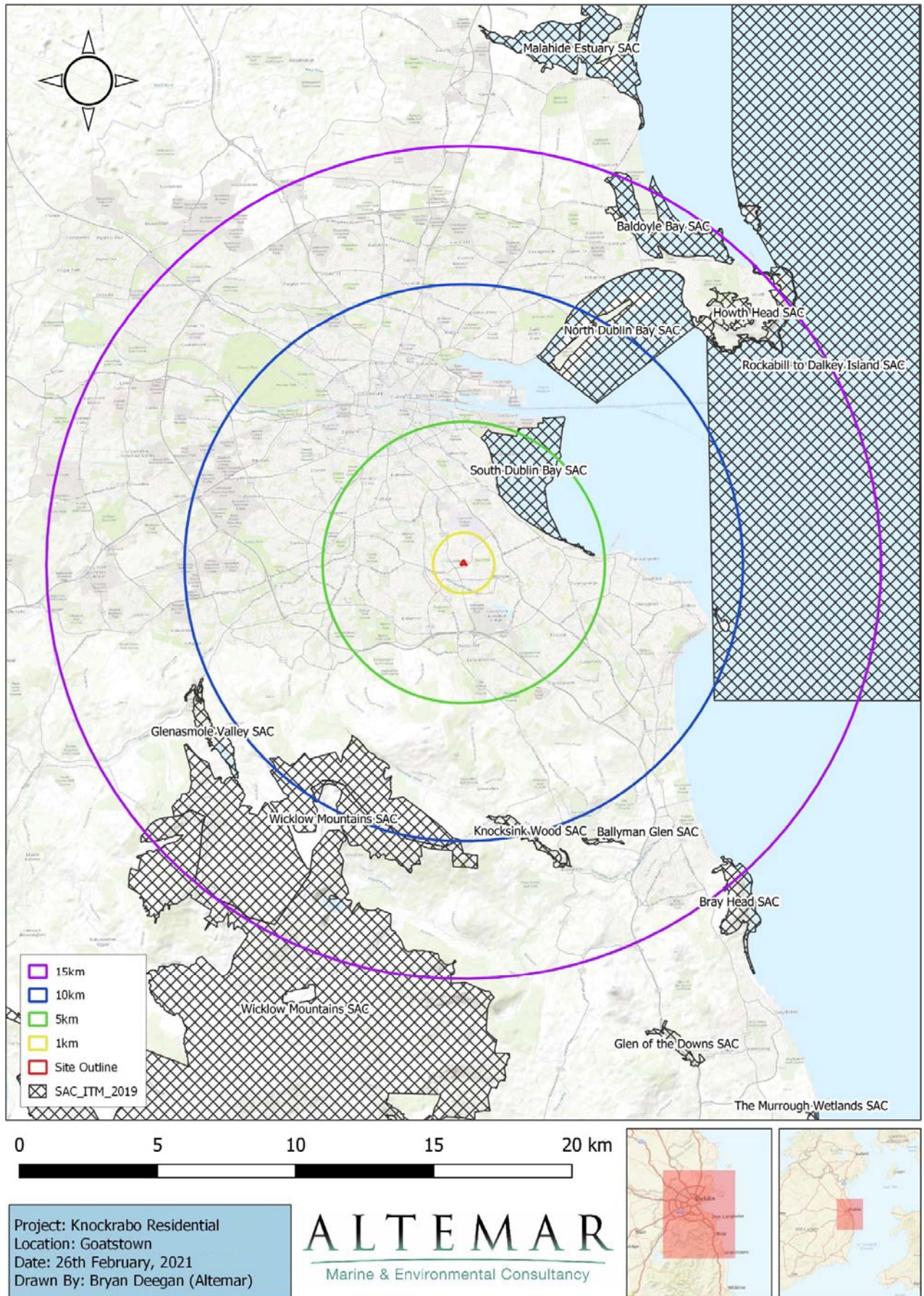


Figure 5. Special Areas of Conservation located within 15km of the proposed development

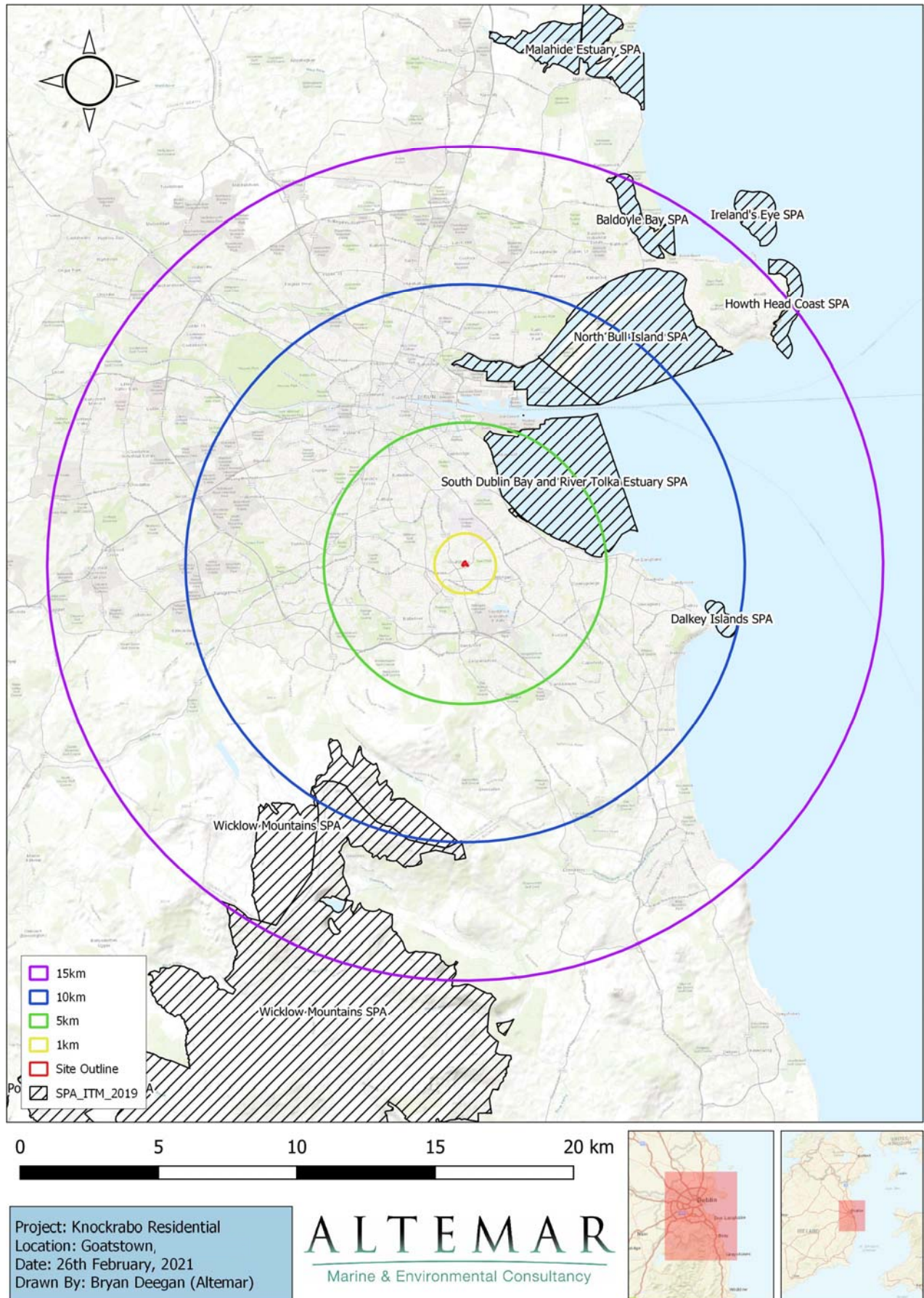


Figure 6. Special Protected Areas located within 15km of the proposed development

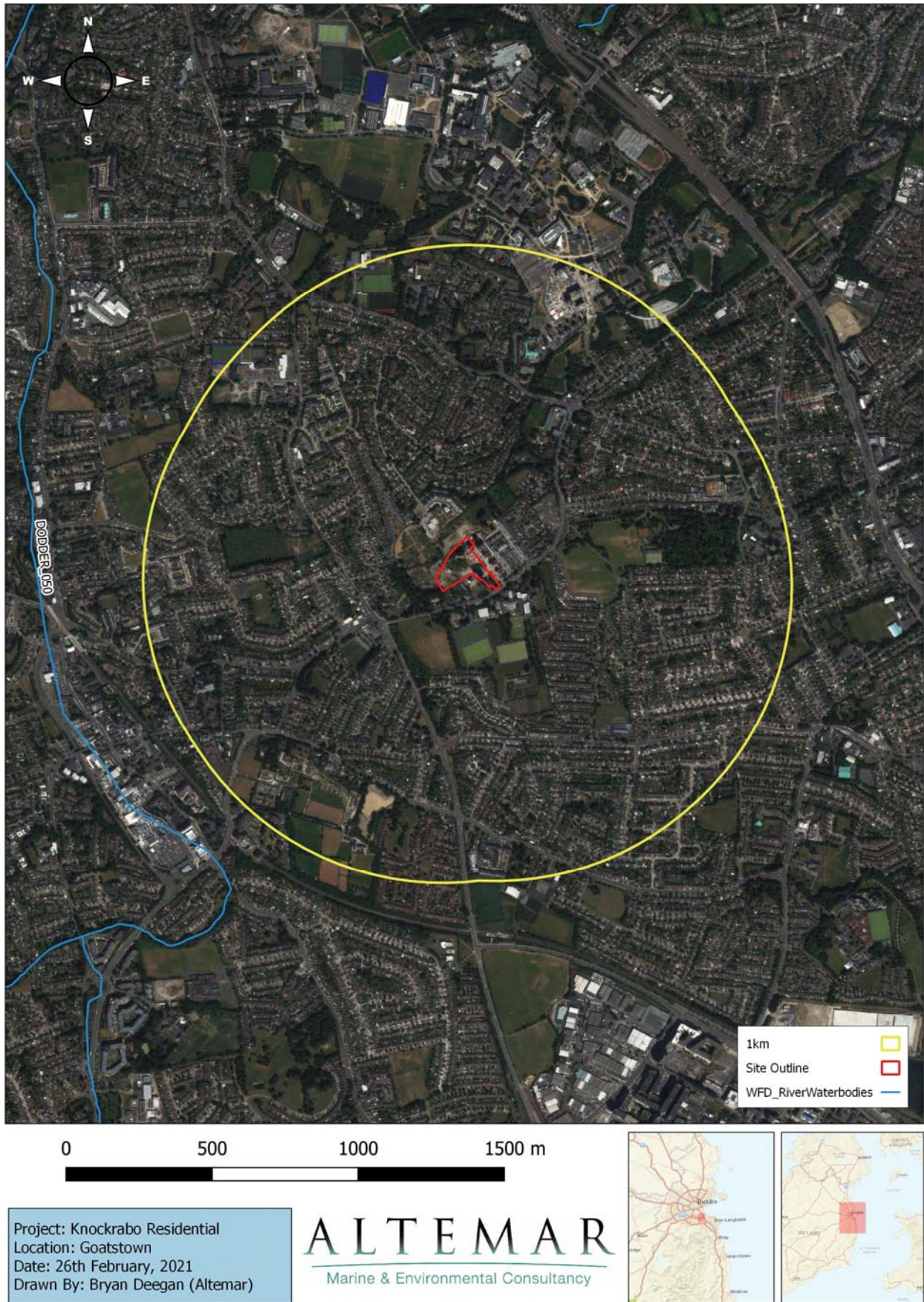


Figure 7. Watercourses in proximity to the proposed development

## In-Combination Effects

There are several development proposals located in the areas surrounding the subject site that have been granted permission. The following is a list of planning application(s) as identified on the Department of Housing, Local Government and Heritage's 'National Planning Application Database' portal:

Ref. No.	Address	Proposal
ABP30442019	Our Lady's Grove, Goatstown Road, Goatstown, Dublin 14	Permission for a strategic housing development consisting of: the demolition of the existing GAS building (966 sq. m) (in addition to the removal of an associated single storey prefabricated structure (117 sq. m)); and the construction of a scheme comprising 132 No. residential units consisting of: 19 No. 4-bed, two storey houses (with habitable attic accommodation over); 3 No. five storey apartment buildings with balconies (comprising Block A with a 3,520 sq. m gross floor area (38 No. units - 6 No. 1-bed units, 30 No. 2-bed units, and 2 No. 3-bed units); Block B with a 3,520 sq. m gross floor area (38 No. units - 6 No. 1-bed units, 30 No. 2-bed units, and 2 No. 3-bed units); and Block C with a 3,176 sq. m gross floor area (33 No. units - 6 No. 1-bed units, 21 No. 2-bed units, and 6 No. 3-bed units)); and 2 No. 3-bed duplex units above 2 No. 2-bed Ground Floor Level apartments to form a three storey terrace with First Floor balconies (395 sq. m in total) (Block D). The development will also consist of the construction of: a 3,327 sq. m basement level comprising car parking (96 No. spaces), motorcycle parking (9 No. spaces), storage facilities, bin stores, plant, etc., extending under Blocks A and B and public open space; and a one and part-two storey childcare facility (measuring 434 sq. m) with terrace at First Floor Level on the western elevation. The development will also consist of the provision of: car parking (73 No. spaces), motorcycle parking (9 No. spaces), and bicycle parking facilities to accommodate 239 No. bicycles, including 3 No. bicycle/bin storage rooms (collectively measuring 130 sq. m) all at surface level; internal routes; Sustainable Urban Drainage Systems including detention basins, permeable paving, attenuation tanks, and green roofs; renewable energy facilities (PV panels); substation; associated signage; hard and soft landscaping works including provision of public open space, boundary treatments and lighting, and changes in levels; piped services and drainage; and infrastructural works above and below ground. The development will also consist of the temporary use of the Ground and First Floor Levels of Block D (apartment/duplex units) as a childcare facility (300 sq. m) with an interim internal/external layout, pending the completion of the proposed childcare facility. The development also includes all other associated site excavation and development works above and below ground.
D19A/0460	106, Goatstown Road, Dublin 14	Permission is sought for demolition of existing 2-storey house and the erection of an 854 sq.m. 3-storey (part 2-storey) building containing 9 apartments (3 x 1-bed, 4 x 2-bed, 2 x 3-bed), and associated works including balconies, 11 car parking spaces and modifications to vehicular entrance.

In the ABP Order/Decision document for application reference **ABP30442019** the following is stated in relation to Appropriate Assessment Screening:

*"In completing the screening exercise, the Board adopted the report of the Inspector and concluded that, by itself or in combination with other development in the vicinity, the proposed development would not be likely to have significant effect on any European Site in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment is not, therefore, required."*

The Planner's report for application reference **D19A/0460** states the following in relation to Appropriate Assessment Screening:

*“The proposed development has been screened for AA (report on file) and it has been determined that the development to be retained would not significantly impact upon a Natura 2000 Site.”*

#### Assessment of Source Pathway Receptor Linkages

As outlined in the Hydrological Risk Assessment *“There is no direct open-water pathway between the site and Dublin Bay. However, there is an indirect pathway through the stormwater drainage should any silt-laden stormwater from construction or hydrocarbon-contaminated water from a construction vehicle leak manage to enter the public stormwater sewer that discharges into the Elm Park Stream which ultimately outfalls into the South Dublin Bay. However, the distance to this receptor is 2.7km from the site.*

*Should any silt-laden stormwater from construction or hydrocarbon-contaminated water from a construction vehicle leak manage to enter the public sewer, the suspended solids will naturally settle within the drainage pipes and hydrocarbons will dilute to background levels (water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019) by the time the stormwater reaches any open water based on the distance to waterways. Similarly, during operation, should any leak of hydrocarbon occur from a vehicle, the volume of contaminant release is low and combined with the significant attenuation within in the public stormwater sewers, hydrocarbons will dilute to background levels with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019. It can also be concluded that the in-combination effects of surface water arising from the proposed development taken together with that of other possible proposed residential developments will not be significant during the operational phase, given the potential loading of contaminant (a worst-case scenario of 70 litres of leakage of petrol during the operation phase) and the attenuation and design measures (SuDS and attenuation tank) required to be included in the design of any such developments in the design.*

*The peak wastewater discharge is calculated as an average wastewater discharge of 7.02 litres/sec which is 0.063% of the current licensed discharge at Ringsend WWTP. As outlined in section 3.1 (iv), upgrade works have commenced in 2018 and are expected to be fully completed by 2025. The upgrade works will result in treatment of sewage to a higher quality than current thereby ensuring effluent discharge to Dublin Bay will comply with the Urban Wastewater Treatment Directive by Q4 2023.*

*The project is being progressed in stages to ensure that the plant continues to treat wastewater to the current treatment levels throughout the delivery of the upgrade. The project comprises three key elements and underpinning these is a substantial programme of ancillary works:*

- *Provision of additional secondary treatment capacity with nutrient reduction (400,000 population equivalent);*
- *Upgrade of the 24 existing secondary treatment tanks to provide additional capacity and nutrient reduction, which is essential to protect the nutrient-sensitive Dublin Bay area; and*
- *Provision of a new phosphorous recovery process.*

*In February 2018, the work commenced on the first element, the construction of a new 400,000 population equivalent extension at the Ringsend Wastewater Treatment Plant. These works are at an advanced stage with testing and commissioning stages expected to be completed in the second half of 2021.*

*The 2019 planning permission facilitated upgrading works to meet nitrogen and phosphorus standards set out in the licence, which are temporarily exceeded currently. Works on the first of four contracts to retrofit the existing treatment tanks with aerobic granular sludge technology commenced in November 2020. Award of the second contract is due in Q3 2021 and the third and fourth contracts are scheduled to commence in late 2021 and mid 2023 respectively.*

*The application for the upgrade of the WWTP in 2012 and the revised upgrade in 2018 was supported by a detailed EIAR. As outlined in the EIAR, modelling of water quality in Dublin Bay has shown that the upgrades (which are now currently underway) will result in improved water quality within Dublin Bay. The 2018 EIAR predicts that the improvement in effluent quality achieved by the upgrade will compensate for the increase in flow through the plant. The ABP inspector’s report summarises the positive findings of the modelling for the post WWTP upgrade*

scenario on Dublin Bay water quality in sections 12.3.5 and 12.3.12 of his report and the overall positive impact for human health and the environment in his conclusions in section 12.9.1.

Even without treatment at the Ringsend WWTP, the peak effluent discharge, calculated for the proposed development as 7.02 litres/sec (which would equate to 0.063% of the licensed discharge at Ringsend WWTP [peak hydraulic capacity]), would not have a measurable impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status (as defined within the Water Framework Directive). This assessment is supported by hydrodynamic and chemical modelling within Dublin Bay which has shown that there is significant dilution for contaminants of concern (DIN and MRP) available quite close to the outfall for the treatment plant (Ringsend WWTP 2012 EIS, Ringsend WWTP 2018 EIAR; refer to Section 12.4.22, ABP-301798-18 Inspector's report). The most recent water quality assessment of Dublin Bay WFD Waterbody undertaken by the EPA (Water Quality in 2020: An Indicator Report, 2021) also shows that Dublin Bay on the whole, currently has an 'Unpolluted' water quality status (refer to [www.catchments.ie](http://www.catchments.ie)).

The assessment of the current proposal has also considered the effect of cumulative events, such as release of sediment laden water combined with a hydrocarbon leak on site. It was also considered the nearby permitted Parkside 4 development (Planning Ref. ABP 305623-19) which is currently under construction. As there is adequate assimilation and dilution between the site and the Natura sites (Dublin Bay), it is concluded that no perceptible impact on water quality would occur at the Natura sites as a result of the construction or operation of this Proposed Development. It can also be concluded that the cumulative or in-combination effects of effluent arising from the Proposed Development with that of other permitted proposed developments (e.g. Parkside 4), or with development planned pursuant to statutory plans in the greater Dublin, Meath and Kildare areas, which will be discharged into Ringsend WWTP will not be significant having regard to the size of the calculated discharge from the Proposed Development and having regard to the following:

- Recent water quality assessment for Irish Sea Dublin and Dublin Bay shows that they currently continue to meet the criteria for 'Unpolluted' water quality status (EPA, data until July 2021).
- The Ringsend WWTP upgrade which is currently being constructed will result in improved water quality by Q4 2023 to ensure compliance with Water Framework Directive requirements.
- All new developments are required to comply with SuDS which ensures management of run-off rate within the catchment of Ringsend WWTP.
- The natural characteristics of Dublin Bay result in enriched water rapidly mixing and degrading such that the plume has no appreciable effect on water quality at Natura sites.

As the Proposed Development will have no additional stormwater run-off during a stormwater event over and above the current level, surface water run-off from the development in the operational phase will therefore have no impact on the current water quality in any overflow situation at Dublin Bay. It should be noted that the bathing status has no direct relevance to the water quality status of the Natura sites due to rapid mixing and dilution resulting in no measurable change in water quality within the overall water body.

Finally, in a worst-case scenario of an unmitigated leak and not considering the operation of the SuDS and interceptor already included in the design, no perceptible risk to any Natura Sites 2000 is anticipated given the distance from source to Dublin Bay protected areas (c. 2.7 Km). Potential contaminant loading will be attenuated, diluted and dispersed near source area."

No cumulative and /or in combination effects on Natura 2000 sites are foreseen.

It is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. It is concluded that no significant effects on Natura 2000 sites will be seen as a result of the proposed development alone or combination with other projects.

**No significant effects are likely from in combination effects**

## Conclusions

The proposed site is located 2.5 km from the nearest Natura 2000 site. There is no direct pathway to Natura 2000 sites. The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites. However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a likely significant effect on the Natura 2000 site.

As outlined in the Hydrological & Hydrogeological Risk Assessment *“It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.”*

Having taking into consideration the proposed project, the effluent discharge from the proposed development works and operation, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, it is concluded that this development that would not give rise to any likely significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or Natura 2000 site.

On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

There is no possibility of significant impacts on Natura 2000 sites, features of interest or site specific conservation objectives. A Natura Impact Statement is not required.

Accordingly, having carried out the Stage 1 Appropriate Assessment Screening, the competent authority may determine that a Stage 2 Appropriate Assessment of the Proposed Development is not required as it can be excluded, on the basis of best up to date available objective scientific information following screening under Part XAB of the Acts as amended, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on any European site. Consequently, it can also be concluded that there will be no significant adverse effect on the integrity of any European site in view of its conservation objectives.



## Findings of No Significant Effects Report

<b>Details of Project</b>	Appropriate Assessment Screening for a Proposed Development at Knockrabo, Goatstown, Co. Dublin.
<b>Name and Location of NATURA 2000 Sites Within 15km</b>	South Dublin Bay SAC Wicklow Mountains SAC North Dublin Bay SAC Rockabill to Dalkey Island SAC Knocksink Wood SAC Glenasmole Valley SAC Ballyman Glen SAC Howth Head SAC Baldoyle Bay SAC Bray Head SAC South Dublin Bay and River Tolka Estuary SPA North Bull Island SPA Wicklow Mountains SPA Dalkey Islands SPA Baldoyle Bay SPA Howth Head Coast SPA
<b>Project Description</b>	Proposed Residential Development at Knockrabo, Goatstown, Dublin 14
<b>Is the Project directly connected with the management of the NATURA 2000 site?</b>	No
<b>Details of any other projects or plans that together with this project could affect the NATURA 2000 site</b>	None
<b>The assessment of significant effects</b>	
<b>Describe how the project is likely to affect the NATURA 2000 site</b>	No Impact Predicted
<b>Response to consultation</b>	N/A
<b>Data collected to carry out the assessment</b>	Site Visit and Supporting NPWS data.
<b>Who carried out the assessment</b>	Altemar Ltd.
<b>Sources of data</b>	NPWS website, standard data form, conservation objectives data of the site and references outlined in the AA Screening Report.
<b>Explain why the effects are not considered significant</b>	Having taking into consideration the findings of the Hydrological & Hydrogeological Risk Assessment, the effluent discharge from the proposed development works and operation, the lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development that would not give rise to any significant effects to designated sites.
<b>Level of assessment completed</b>	Stage 1 Screening
<b>Overall conclusions</b>	On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

## Data Used for AA Screening

NPWS site synopses and Conservation objectives of sites within 15km were assessed. The most recent SAC and SPA boundary shapefiles were downloaded and overlaid on ESRI road maps and satellite imagery.

## References

The following references were used in the preparation of this AA screening report.

1. Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive – Guidance for Planning Authorities March 2010.
2. Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government 2009;  
[http://www.npws.ie/publications/archive/NPWS\\_2009\\_AA\\_Guidance.pdf](http://www.npws.ie/publications/archive/NPWS_2009_AA_Guidance.pdf)
3. Managing NATURA 2000 Sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC, European Commission 2000;
4. 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;
5. Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission;
6. Guidance document on the implementation of the birds and habitats directive in estuaries and coastal zones with particular attention to port development and dredging;  
[http://ec.europa.eu/environment/nature/Natura2000/management/docs/guidance\\_doc.pdf](http://ec.europa.eu/environment/nature/Natura2000/management/docs/guidance_doc.pdf)
7. The Status of EU Protected Habitats and Species in Ireland.  
[http://www.npws.ie/publications/euconservationstatus/NPWS\\_2007\\_Conservation\\_Status\\_Report.pdf](http://www.npws.ie/publications/euconservationstatus/NPWS_2007_Conservation_Status_Report.pdf)
8. NPWS (2013) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
9. NPWS (2017) Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
10. NPWS (2021) Conservation objectives for Knocksink Wood SAC [000725]. Generic Version 8.0. Department of Housing, Local Government and Heritage.
11. NPWS (2019) Conservation Objectives: Ballyman Glen SAC 000713. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.
12. NPWS (2013) Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
13. NPWS (2013) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
14. NPWS (2021) Conservation objectives for Glenasmole Valley SAC [001209]. Generic Version 8.0. Department of Housing, Local Government and Heritage.
15. NPWS (2017) Conservation Objectives: Bray Head SAC 000714. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
16. NPWS (2016) Conservation Objectives: Howth Head SAC 000202. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
17. NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
18. NPWS (2021) Conservation objectives for Wicklow Mountains SPA [004040]. Generic Version 8.0. Department of Housing, Local Government and Heritage.
19. NPWS (2021) Conservation objectives for Dalkey Islands SPA [004172]. Generic Version 8.0. Department of Housing, Local Government and Heritage.
20. NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
21. NPWS (2021) Conservation objectives for Howth Head Coast SPA [004113]. Generic Version 8.0. Department of Housing, Local Government and Heritage.