



PROPOSED LARGE-SCALE RESIDENTIAL LED MIXED-USED DEVELOPMENT
ON MILLTOWN PARK AT SANDFORD ROAD

Appropriate Assessment Screening Report

Sandford Living Limited

Report no.: 002, Rev. 003

Date: 11/12/2025



Project name: Proposed Large-Scale Residential led Mixed-used Development on Milltown Park at Sandford Road
 Report title: Appropriate Assessment Screening Report
 Customer: Sandford Living Limited,
 Customer contact: Patricia Thornton
 Date of issue: 11/12/2025
 Project no.: 10575321
 Organisation unit: Energy Systems
 Report no.: 002, Rev. 003

DNV Markets & Risk
 Block 71, The Plaza, Partkwest,
 Dublin
 Tel: 01 565 4730

Applicable contract(s) governing the provision of this Report:

Objective:

Prepared by:

Verified by:

Approved by:

Ciara Barry-Hannon
Senior Ecologist

Liam Gaffney
Senior Ecologist

Shea O'Driscoll
Principal Ecologist

Internally in DNV, the information in this document is classified as:

	Can the document be distributed internally within DNV after a specific date?	
	No	Yes
<input type="checkbox"/> Open	--	--
<input checked="" type="checkbox"/> DNV Restricted	--	--
<input type="checkbox"/> DNV Confidential	<input type="checkbox"/>	<input type="checkbox"/> 2025.12.01
<input type="checkbox"/> DNV Secret	<input type="checkbox"/>	<input type="checkbox"/> 2025.12.01

Additional authorised personnel for distribution within DNV:

Keywords

Rev. no.	Date	Reason for issue	Prepared by	Verified by	Approved by
003	11/12/2025	Final Report – Final Issue	CBH	LG	SOD

Copyright © DNV 2025. All rights reserved. Unless otherwise agreed in writing: (i) This publication or parts thereof may not be copied, reproduced or transmitted in any form, or by any means, whether digitally or otherwise; (ii) The content of this publication shall be kept confidential by the customer; (iii) No third party may rely on its contents; and (iv) DNV undertakes no duty of care toward any third party. Reference to part of this publication which may lead to misinterpretation is prohibited.

TABLE OF CONTENTS

TABLE OF CONTENTS	II
TABLE OF FIGURES.....	II
TABLE OF TABLES	III
1 INTRODUCTION.....	1
1.1 Background	1
1.2 Quality Assurance and Competence	1
2 DESCRIPTION OF THE PROPOSED DEVELOPMENT	2
2.1 Site Location	2
2.2 Project Description	2
2.3 Relevant Aspects of the Proposed Development	6
3 LEGISLATIVE & POLICY CONTEXT.....	7
3.1 Legislative Background	7
3.2 Policy Context	8
3.3 Stages of Appropriate Assessment	10
4 METHODOLOGY.....	11
4.1 Guidance	11
4.2 Screening Steps	11
4.3 Desk Study	11
4.4 Ecological surveys	12
4.5 Identification of Relevant European Sites	13
4.6 Assessment of Significant Effects	13
4.7 Limitations	14
5 STAGE 1 SCREENING ASSESSMENT	15
5.1 Management of European sites	15
5.2 Existing Environment	15
5.3 Assessment of Likely Significant Effects	28
5.4 Potential for In-combination Effects	31
6 APPROPRIATE ASSESSMENT SCREENING CONCLUSION	46
7 REFERENCES.....	47
8 APPENDICES.....	50
8.1 Appendix 1	50

TABLE OF FIGURES

Figure 1. Site Location (QGIS, 2025).....	4
Figure 2. Proposed site layout (extracted from 19037C-OMP-ZZ-ZZ-M3-A-1001 - Proposed Site Plan - Combined Entry Level B1 – 00, 2025).....	5
Figure 3. Example of the proposed building elevations of Block C, showing the mixed façade composition and interspersed areas of glazing (OMP Drwg: 19037C-OMP-ZZ-ZZ-M3-A-0002).	21
Figure 4. European sites relative to the Proposed Development and potential impact pathways (QGIS, 2025).	27
Figure 5: Photograph from the sales brochure of the Sandford Road Site showing the unmanaged grassland with tall grass, taken in 2019. (Source: Sandford Road Sales Brochure, GVA Donal O Buachalla).....	50



Figure 6: Photograph taken during a Site visit of the Sandford Road Site showing the unmanaged grassland with tall grass, taken in 2025. (Source: DNV, 2025) 50

TABLE OF TABLES

Table 1. European sites considered with the Source-Pathway-Receptor (S-P-R) method to establish notable pathways between the Proposed Development and any relevant European sites. Those sites with notable S-P-R links are highlighted in green (if any). QIs are taken from the relevant Conservation Objectives Documents (as referenced) and/or the Standard Data Forms (EEA, 2025).	23
Table 2. Assessment of potential in-combination effects of the Proposed Development and other developments pending or granted permission in the last 5 years (2017-2022) within 500m of the site.	32
Table 3. Summary of screening for likely significant effects on European sites that maintain a S-P-R pathway to the Proposed Development	45

1 INTRODUCTION

1.1 Background

DNV was commissioned by Sandford Living Limited to carry out an Appropriate Assessment (AA) Screening Report (the “Report”) in relation to a Proposed Large-scale Residential led mixed-use Development (the “Proposed Development”) located at a ca. 4.26-hectare site at Milltown Park, Sandford Road, Dublin 6, D06 V9K7 (hereafter referred to as the “Site”). This Report contains information to enable the competent authority to undertake Stage 1 AA Screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants.

This Report was authored by DNV Senior Ecologist Ciara Barry-Hannon (CBH). The ecological surveys (bats, terrestrial flora and fauna) at the Site were coordinated by DNV Senior Ecologist Liam Gaffney (LG). DNV Ornithologist Brian McCloskey (BM) coordinated the bird surveys of the Site.

CBH is a Senior Ecologist with DNV and has a BSc. (Hons) in Wildlife Biology from Munster Technological University (formerly ITT). CBH has a wealth of experience in desktop research, literature review and reporting, as well as practical field and laboratory experience including experience in surveying habitats, plants, bats, birds, mammals, and invasive species. CBH is experienced in the preparation of Preliminary Ecological Appraisals (PEA), Ecological Impact Assessments (EclA), and Stage I/Stage II Appropriate Assessment Reports, as-well as ornithology reports for renewable energy projects (wind and solar technology). Additionally, CBH has completed, and supported the preparations of several Biodiversity Chapters for Environmental Impact Assessment Reports (EIAR). CBH is also a Qualifying member of CIEEM.

LG is a Senior Ecologist with 6 years of experience in ecological consultancy. With a B.Sc. in Zoology (Hons) and a M.Sc. (Hons) in Wildlife Conservation and Management from University College Dublin LG is experienced in desktop research, literature scoping-review, and report writing, as well as practical field experience (e.g., Bat surveys, habitat surveys, invasive species surveys, wintering bird surveys, large mammals, fresh water macro-invertebrates etc.). LG’s MSc thesis was a literature scoping review on the ecosystem services provided by Irish bats. He has also completed best practice guidance courses on bat survey and mitigation techniques such as: ‘Bat Ecology & Survey’ and ‘Bat Impacts and Mitigation’ both held by the Chartered Institute of Ecology and Environmental Management (CIEEM). LG is experienced in compiling Biodiversity Chapters of EIARs, EclAs, AA screening and Natura Impact Statements (NIS) reports, and in the overall assessment of potential impacts to ecological receptors from a range of developments. LG is also a Qualifying member of CIEEM with full membership application pending.

BMcC is an experienced Ornithologist with a BSc in Planning and Environmental management from the Technological University of Dublin (TUD) and over 12 years of bird survey experience, including three years of professional Ornithology work. BMcC is a longstanding and active member of Bird Watch Ireland and is also the author of several articles in UK birding publication Birdwatch Magazine. BMcC is highly experienced in all survey methodologies and with surveying all species groups of Irish birds and migrants, having provided a range of ornithology survey work for ecological consultancies, e.g., vantage points surveys of gulls, terns, raptors, waders and wildfowl; hinterland surveys of the above as well as riverine species; and breeding waders and country birds.

2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

2.1 Site Location

The Proposed Development Site is located off Sandford Road and Milltown Road (R117), Milltown, Co Dublin (Figure 1). The Site is currently comprised of a mix of buildings and green space with an overall developable area of 4.26Ha. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the Site including improvements to pedestrian facilities on an area of ca. 0.1Ha. Works associated with the Site's surface water drainage network will entail works through the junction of Milltown Road / Sandford Road and along a portion of Eglinton Road (R824) (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of ca. 0.32 Ha.

The Proposed Development Site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares. The Site is accessed to the north via the R117 and is surrounded to the north, east and west by residential lands. The southern boundary of the Site backs on to lands owned by the Jesuit order and zoned as Z15. The closest European sites to the Proposed Development are South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA which are located approximately 2.2km to the east of the Site.

2.2 Project Description

Sandford Living Limited intend to apply for permission for a Large-Scale Residential led Mixed-use Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, D06 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The Development will principally consist of: the demolition of c. 4,847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2,031 sq m), the Finlay Wing (622 sq m), the Archive (1,240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units).

Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.

The Development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1,698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).

The Development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries; bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.



The proposed development has a gross floor space of c.50,196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10,550 sq m, which includes parking spaces, bin storage, bike storage and plant.

See Figure 2 for Proposed Site Layout.

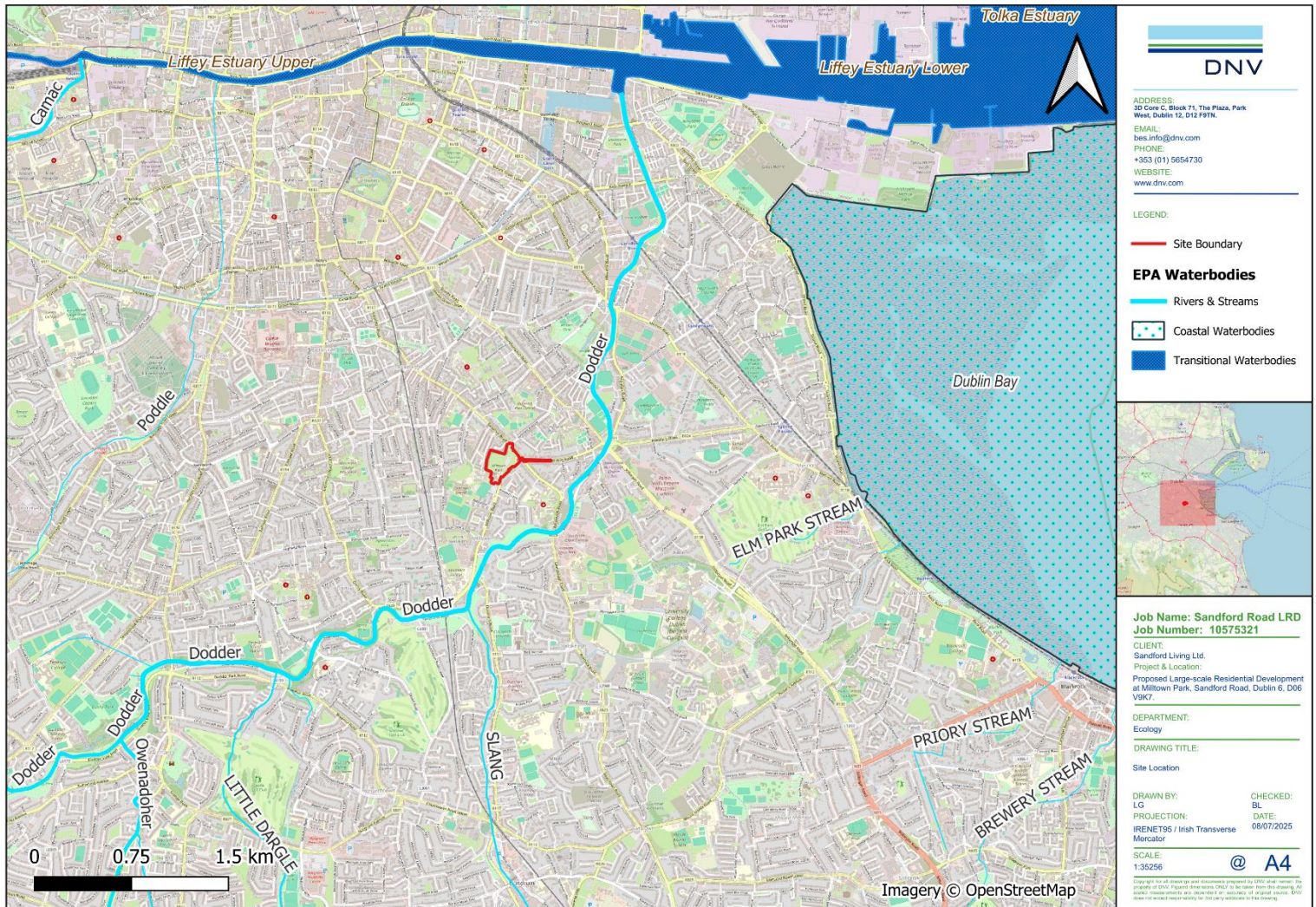


FIGURE 1. SITE LOCATION (QGIS, 2025)

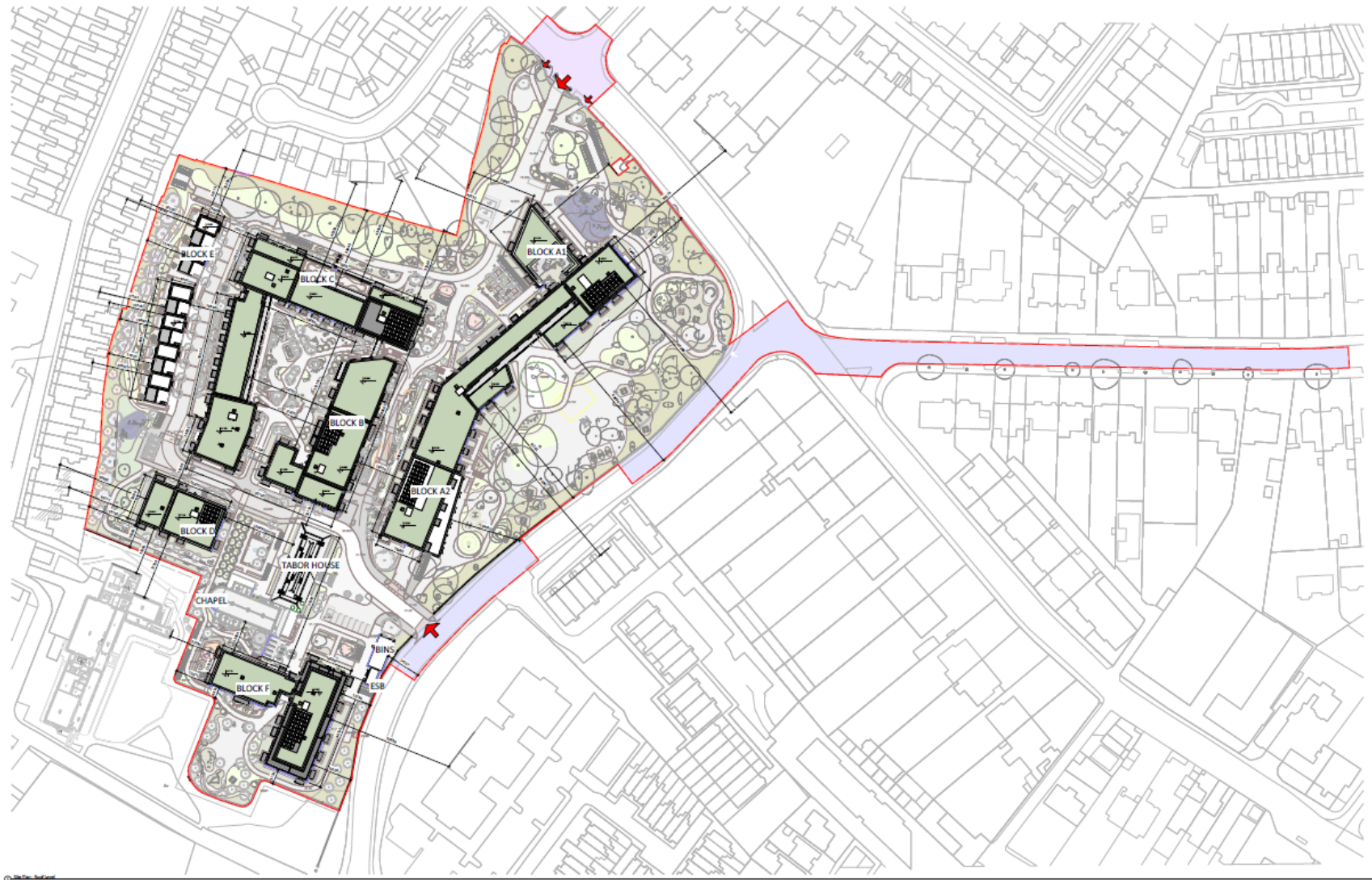


FIGURE 2. PROPOSED SITE LAYOUT (EXTRACTED FROM 19037C-OMP-OO-08-DR-A-1109 - PROPOSED SITE PLAN – ROOF LEVEL, 2025).

2.3 Relevant Aspects of the Proposed Development

2.3.1 Construction Phase Details

The following details are taken from the Preliminary Construction Management Plan (PCMP) prepared by DBFL Consulting Engineers (DBFL, 2025a) and the Infrastructure Drainage Report (IDR) (DBFL, 2025b).

The Proposed Development will be phased as per the following:

- Phase 1 – Site Set Up, Enabling Works and Demolitions
- Phase 2 – Basement Box
- Phase 3 – Block D, Block F and works at Tabor House and The Chapel
- Phase 4 - Block A1, Block A2, Block B, Block C and Block E (Courtyard Houses).

For the duration of the proposed infrastructure works, typical working hours shall be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 09:00 to 13:00 Saturdays, subject to the restrictions imposed by the local authority. No working will be allowed on Sundays and Public Holidays. Subject to the agreement of the local authority, out of hours working may be required for water main connections, foul drainage connections etc.

2.3.2 Surface Water Drainage

The Site generally falls from south to north at a gradient of approx. 1:45, with surface gradients becoming flatter on approach to the existing site access off Sandford Road. An existing 225mm diameter surface water drain is located approximately 80m from the eastern corner of the Site, on Eglinton Road. The existing surface water drains on Site currently discharge to the existing combined sewer network along Sandford Road and Milltown Road, rather than the existing surface water drain in Eglinton Road/Dodder River. Rain waters across the green spaces that currently exist at the Site likely percolate to ground.

Surface water sewers from the Proposed Development will discharge at attenuated flows to the existing drainage network on Eglinton Road (approximately 195m from the Sandford Road / Eglinton Road junction where the public line increases to a 300mm diameter pipe). In order to achieve the required drainage invert levels on Site, approximately 160m of the existing drainage network along Eglinton Road will need to be replaced with a 300mm pipe running at a flatter gradient. The total length of the surface water outfall from the point it crosses the Site boundary at Milltown Road to the discharge point on Eglinton Road is approximately 300m. As noted in the DBFL IDR (DBFL, 2025b) enclosed separately, detailed topographic and GPR surveys were carried out along the proposed outfall route (Milltown Road, through the junction of Milltown Road/Sandford Road and Eglinton Road) to assess feasibility concerning the location of existing services.

Prior to surface water being discharged from the Site it will be attenuated and treated via a suite of Sustainable Drainage System (SuDS) measures at the Site. These will comprise:

- Green Roofing – The proposed build-up will be an extensive type with 100mm minimum construction depth and sedum planting.
- Surface water runoff from the roofs of courtyard units located along the western boundary will be routed to the proposed surface water pipe network via porous aggregates beneath permeable paved driveways (providing an additional element of attenuation).
- Green Areas Over Podium –Soft landscaped podium areas will have typical soil depths of up to 300mm to facilitate grassed areas, plants, shrubs and trees i.e. similar to a deep intensive green roof build up.
- Surface water runoff from the majority of site's internal street network will be directed to the proposed pipe network via tree pits or other SuDS features such as swales or bioretention areas, with overflows to conventional road gullies.
- Surface water runoff from in curtilage parking spaces associated with courtyard units located along the western boundary will be captured by permeable paving.

- Any incidental surface water runoff generated from the basement carpark would drain through a separate system beneath the basement slab (discharging to the proposed foul drainage network via a petrol interceptor).

Surface water discharge rates from the proposed surface water drainage network will be controlled by a vortex flow control device (Hydrobrake or equivalent) and associated underground attenuation tanks (Stormtech Chambers or equivalent). Surface water discharge will also pass via a full retention fuel / oil separator (sized in accordance with permitted discharge rate from the Site).

2.3.3 Foul drainage

Two foul drainage discharge points are proposed for the Site (in the vicinity of the proposed access off Milltown Road and the existing access of Sandford Road), which will link in with existing infrastructure along Sandford Road which eventually flows to Ringsend Wastewater Treatment Plant (WwTP) for treatment.

3 LEGISLATIVE & POLICY CONTEXT

3.1 Legislative Background

The Habitats Directive (92/43/EEC) (as amended) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) (as amended) seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs). The Habitats Directive has been transposed into Irish law through Part XAB of the Planning and Development Act 2000, as amended and the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011) (as amended).

SACs and SPAs are collectively known as Natura 2000 or European sites. It is the responsibility of each member state to designate SACs and SPAs. SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the Qualifying Interests (QIs) of the sites; from these the conservation objectives of the site are derived.

An AA is a required assessment to determine the likelihood of significant effects, based on best scientific knowledge, of any plans or projects on European sites. A screening for AA determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant effects on a European site, in view of its conservation objectives. The obligations in relation to Appropriate Assessment have been implemented in Ireland under Part XAB of the Planning and Development Acts (as amended) and in particular Section 177U and Section 177V thereof.

This AA Screening has been undertaken to determine the potential of the Proposed Development to have likely significant effects on relevant European sites.

3.1.1 Consideration of Embedded Mitigation

With regard to the consideration of embedded mitigation in the Appropriate Assessment process the following is noted. In Case C 721/21 Eco Advocacy, the Court of Justice of the European Union held that, regarding the interpretation of Article 6(3) of Directive 92/43 (as amended), the Article must be interpreted as meaning that:

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

As such, standardised embedded mitigation (such as the use of SuDS in large-scale residential developments), that are incorporated into the design of a proposal or project and which may result in the elimination of likely significant effects on European sites, but where the primary reason of the embedded mitigation is not to protect a

European site, are permitted for consideration when screening for AA. This is consistent with the policy of Dublin City Council (SI122) to “To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study ...”.

3.2 Policy Context

3.2.1 Dublin City Council Development Plan 2022 – 2028

Policies and objectives of the Dublin City Development Plan (DCDP) 2022-2028 that are of relevance to this Screening Report are outlined below. This assessment is in compliance with the Dublin City Council Development Plan 2022-2028.

Relevant policies include:

- **GI9:** “To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).”
- **GI10:** “To adequately protect flora and fauna (under the EU Habitats and Birds Directives, the Wildlife Acts 1976–2021, the Fisheries Acts 1959-2006 and the Flora (Protection) Order 2015 S.I No. 356 of 2015), wherever they occur within Dublin City, or have been identified as supporting the favourable conservation condition of any European sites.”
- **GI13:** “To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.”
- **GI14:** “To maintain and strengthen the integrity of the city’s ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any Proposed Development likely to have a significant impact on habitats and species of interest on or adjacent an ecological corridor.”
- **GI30:** “To conserve, maintain and restore freshwater and estuarine habitats which are of importance for species listed in the annexes of the EU Birds and Habitats Directives and to ensure connectivity of these in accordance with Article 10 of the EU Habitats Directive.”
- **SI22:** “To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.”

In addition, the DCDP 2022-2028 provides a suite of objectives to support plans aimed at enhancing and protecting biodiversity at a local and national level, such as the National Biodiversity Action Plan 2025-2030 and the Dublin City Biodiversity Action Plan 2021 – 2025. The biodiversity objectives also outline a number of measures to protect the City’s biodiversity, through helping the management of the North Bull Island Nature Reserve, supporting measures to prevent invasive species introduction and spread, recognising and protecting important County Geological Sites and encouraging the use of the Dublin City Habitat Map Database (2020, and updates) to inform planning decisions.

3.2.2 National Biodiversity Action Plan 2025-2030

The National Biodiversity Plan (NBAP) 2025-2030, the fourth such plan for Ireland, captures the objectives, targets and actions for biodiversity that will be undertaken by a wide range of government, civil society and private sectors. Actions required to achieve the strategic objectives as well as the lead and key partners responsible for their implementation are set out for each of the objectives and their outcomes. This assessment has had regard to the objectives of the NBAP and how they relate to AA and the protection of designated sites, including Objective 2: *Meet Urgent Conservation and Restoration Needs*, and target outcome 2A: *The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced*.

3.2.3 Dublin City Biodiversity Action Plan 2021-2025

Dublin City Biodiversity Action Plan (DCBAP) 2021 – 2025 is set out to protect and improve biodiversity through specific objectives. This assessment has had regard to these objectives and how they relate to AA and the protection of designated sites, in particular Objective 2 of the DCBAP.

The objectives of the DCBAP are as follows:

- **Objective 1:** Ensure effective implementation of the Dublin City Biodiversity Action Plan.
- **Objective 2:** Protect designated sites for nature conservation in accordance with the Conservation Management objectives for Natura 2000 sites and proposed Natural Heritage Areas in Dublin City.
- **Objective 3:** Identify and protect sites that have conservation value for biodiversity using evidence-based research.
- **Objective 4:** Monitor and conserve legally protected species within Dublin City, particularly those listed in the annexes of the EU Birds and Habitats Directive using evidence-based research.
- **Objective 5:** Prepare and plan for the impacts of climate change on biodiversity.
- **Objective 6:** Implement measures for species with that have a local biodiversity value or impact local biodiversity.
- **Objective 7:** Prepare and disseminate information on guidance for development and site management for biodiversity conservation.
- **Objective 8:** Devise and implement habitat restoration initiatives across Dublin City.
- **Objective 9:** To use nature-based solutions to restore biodiversity and ecosystem services.
- **Objective 10:** Strengthen measures to control Invasive Alien Species (IAS), improve biosecurity and ecological status of catchments.
- **Objective 11:** Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works.
- **Objective 12:** Promote net biodiversity gain and ensure there is no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure.
- **Objective 13:** Pilot initiatives for the creation of habitats using artificial habitat methods.
- **Objective 14:** Minimise and reduce soil degradation in the Dublin City Council administrative area.
- **Objective 15:** Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works.
- **Objective 16:** Empower citizens to connect with and take positive action for biodiversity at a local and city-wide level.
- **Objective 17:** Strengthen collaboration for the conservation of biodiversity at a regional, national, and global level.

3.3 Stages of Appropriate Assessment

This AA Screening Report (the 'Screening Report') has been prepared by DNV. It considers whether the Proposed Development is likely to have a significant effect on a European site and whether a Stage 2 AA is required.

The AA process is a four-stage process. Each stage requires different considerations, assessments and tests to ultimately arrive at the relevant conclusion for each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

The four stages of an AA, can be summarised as follows:

- **Stage 1: Screening.** The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.
- **Stage 2: NIS.** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site(s) despite mitigation, it can only grant consent after proceeding through stages 3 and 4.
- **Stage 3: Derogation from Article 6(3) under certain circumstances.** If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. Stage 3 requires:
 - Examination of alternative solutions, and, where no alternative solution exists;
 - Examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.
 - Implementation of compensatory measures to maintain the coherence of the Natura 2000 network.

The Habitats Directive promotes a hierarchy of avoidance, mitigation, and compensatory measures. First the project should aim to avoid any negative effects on European sites by identifying possible effects early in the planning stage and designing the project to avoid such effects. Second, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse effects on the site(s) remain. If the project is still likely to result in adverse effects, and no further practicable mitigation is possible, a refusal for planning permission may be recommended. In this case, the project will generally only be considered where no alternative solutions are identified and the project is required for IROPI, or, in the case of priority habitats, considerations of health or safety, or beneficial consequences of primary importance for the environment or to other IROPI. Then compensation measures are required for any remaining adverse effects.

4 METHODOLOGY

4.1 Guidance

This AA Screening Report has been undertaken in accordance with the following guidance:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision);
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10;
- *Communication from the Commission on the precautionary principle* (European Commission, 2000);
- *Managing European sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019);
- *Assessment of plans and projects in relation to European sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC Brussels, 28.9.2021 C* (European Commission, 2021);
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021; and*
- *Amendments to section 42 of the Planning and Development Act 2000, as amended and associated Planning and Development Regulations 2001. Department of the Environment, Heritage and Local Government. (2021). Circular Letter: EUIPR 01/2021.*

4.2 Screening Steps

Screening for AA involves the following steps:

- Establish whether the plan or project is directly connected with or necessary for the management of a European site;
- Description of the plan or project and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the European site;
- Identification of European sites potentially affected;
- Identification and description of potential effects on the European site;
- Assessment of the likely significance of the effects identified on the European site; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

It should be noted that any specific targeted ecological mitigation measures and/or measures intended or included exclusively for the purposes of avoiding adverse effects arising from the Proposed Development on any European site **have not been considered** as part of this Screening Report.

4.3 Desk Study

A desktop study was carried out in November 2025 to collate and review available information, datasets and documentation sources relevant for the completion of this Screening Report. The desktop study relied on the following sources:

- Information on the network of European sites, boundaries, qualifying interests and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie;
- Text summaries of the relevant European sites taken from the respective site synopses available at www.npws.ie;
- Information on species records and distributions, obtained from the National Biodiversity Data Centre (NBDC) at www.maps.biodiversityireland.ie;

- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.gis.epa.ie;
- Information on surface water, storm water and sewage infrastructure within and surround the site provided by the applicant and their design team.
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at www.gsi.ie;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the National Planning Application Database (DHLGH, 2025a) and the Department of Housing, Local Government and Heritage's (DHLGH) EIAR Online Portal (DHLGH, 2025b).

For a complete list of the specific documents consulted as part of this assessment, see *Section 5 References*.

4.3.1 Brent Goose Desk Study

To further assess the Sites importance for wintering birds, particularly Brent Goose (*Branta bernicla hrota*) a desk study was undertaken to examine existing information pertaining to this species, with a focus on habitat requirements. The results of this desk study have been incorporated into Section 5.2.4.1.3 below.

4.4 Ecological surveys

A suite of ecological surveys have been conducted at the Site to date, with some still underway at time of writing (December 2025) and some to be conducted at a later date, as per best practice guidance which determines seasonal suitability for conducting ecological surveys. However, it is noted that none of the ongoing ecological surveys are relevant to QI/SCI designated habitats or species for any European Sites, and so the incomplete nature of these surveys will not impact this assessment. The aim of the 2025 surveys is to provide up to date data on the ecology present at the Site, to effectively 'ground-truth' the results of previous surveys, providing a comprehensive understanding of baseline ecology at the Site and to aid in the assessment of the potential impact the Proposed Development could place upon this, with all surveys forming part of the final EIAR being submitted for this LRD application.

For full details on the range of ecological surveys conducted at the Site, please refer to the EIAR Biodiversity Chapter that will accompany final application submission. Results of surveys where they are relevant to Appropriate Assessment are detailed in Section 5.2.2.

4.4.1 Bird Surveys

Of relevance to the Appropriate Assessment of the Proposed Development is the potential for bird species listed as Special Conservation Interests (SCI) species for nearby SPAs to utilise the Site during the breeding and/or non-breeding season. As such a suite of bird surveys have been conducted at the Site to date.

JBA Consulting carried out winter bird surveys at the Site between November 2020 and February 2021. Winter waterbird surveys were conducted at the Site by DNV (then known as Enviroguide Consulting) and were conducted for the duration of the 2022/23 winter survey season. Breeding bird surveys were also conducted at the Site in 2021, 2022, 2024 and are ongoing for 2025.

DNV's survey methodology follows the relevant breeding and non-breeding bird survey guidance published by the Bird Survey & Assessment Steering Group (2025) '*Bird Survey Guidelines for assessing ecological impacts*'. Each survey consists of a combination of walked transects of the Site (being walked at a slow, ambling pace, stopping to scan priority habitat/features where appropriate) and vantage point observation from fixed points, as required. The flight-line survey component consists of vantage point observation by a surveyor using binoculars and identification guides where necessary to identify all target species in flight over the Site.

The flight-line surveys focus on those Species of Conservation Interest (SCI) species that are characterised as “poor” fliers and considered to be more at risk of collision (see Eirgrid, 2012, 2016). The most at-risk groups (classified as ‘medium’ and ‘high’ collision risk species) include wader species; waterfowl such as geese, swan and duck species; and some raptor species. Gulls such as Herring Gull are classed as ‘low’ collision risk species due to their superior manoeuvrability when flying (see Eirgrid, 2012, 2016), and therefore, are not classified as ‘at-risk’ species in terms of in-flight collisions with structures. All surveys were undertaken using:

- Opticron 8x42 binoculars (or equivalent).
- Opticron 20x Telescope (or equivalent).
- Agreed survey methodology.
- A4 map of survey area.

4.5 Identification of Relevant European Sites

The Zone of Influence (ZOI) for a project is the area over which ecological features may be affected by changes as a result of a development and associated activities. This is likely to extend beyond the development site, for example where there are ecological or hydrological links beyond the site boundaries (CIEEM, 2024). Furthermore, ZOI in relation to European sites is described as follows in the ‘OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management’ (OPR, 2021):

“The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km).”

Thus, to identify the European sites that potentially lie within the ZOI of the Proposed Development, a Source-Path-Receptor (S-P-R) method was adopted, as described in OPR PN01 (OPR, 2021).

The relevant European sites were identified based on the following:

- Identification of potential sources of effects based on the Proposed Development description and details, including changes to potentially suitable *ex-situ* habitats at the Site (i.e., habitats utilised by Species of Conservation Importance (SCI) bird species outside of their designated SPAs).
- Use of up-to-date GIS spatial datasets for European designated sites and water catchments – downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) to identify European sites which could potentially be affected by the Proposed Development; and
- Identification of potential pathways between the Site of the Proposed Development and any European sites within the ZOI of any of the identified sources of effects.
 - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any European sites.
 - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any European sites.
 - Air and land connectivity assessed based on Proposed Development details and proximity to European sites.
 - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Defining the likely ZOI based on the identified sources of effects and potential pathways between the Proposed Development and any European sites.

4.6 Assessment of Significant Effects

The conservation objectives of the European sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed Development is likely to have a significant effect on any of the QIs/SCIs and/or conservation objectives listed for those European sites.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., *“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”*.

The potential for likely significant effects that may arise from the Proposed Development was considered through the use of key indicators, namely:

- Habitat loss or alteration.
- Habitat/species fragmentation.
- Disturbance and/or displacement of species.
- Changes in population density.
- Changes in water quality and resource.

In addition, information pertaining to the conservation objectives of the European sites, the ecology of the designated habitats and species and known or perceived sensitivities of the habitats and species were considered.

4.7 Limitations

No limitations were encountered which would prevent robust conclusions from being drawn as to the potential impacts of the Proposed Development and therefore the likely significant effects on European sites, in view of each site's conservation objectives.

5 STAGE 1 SCREENING ASSESSMENT

5.1 Management of European sites

The Proposed Development at Milltown Park, Sandford Road, Dublin 6 is not directly connected with or necessary to the management of any European sites.

5.2 Existing Environment

5.2.1 Desk Study Results

5.2.1.1 Surface Water

The Site of the Proposed Development is located within the Liffey and Dublin Bay catchment and Dodder_SC_010 sub-catchment. There are no surface waterbodies within the Site. The closest waterbody to the Site is the River Dodder (EPA Code:09D01) approximately 250m to the south-east of the sewer works associated with the Proposed Development, along Eglinton Road, and ca.470m to the east of the main Site area. The Dodder flows in a north easterly direction and joins the River Liffey at Grand Canal Dock before flowing into Dublin Bay. The River Dodder has been assigned 'Moderate' water quality status (WFD, 2019-2024) and is classified as 'At Risk' of failing to achieve their Water Framework Directive status objectives by 2027. Similarly, the Lower Liffey Estuary which receives waters from the Dodder has been assigned 'Moderate' water quality status and is classified as 'At Risk' of failing to achieve their Water Framework Directive status objectives (WFD, 2019-2024) (EPA, 2025).

5.2.1.2 Geology and Hydrogeology

The Site of the Proposed Development is situated on the Dublin groundwater body (IE_EA_G_008), which is classified as having 'Good' status (WFD Status 2019-2024) and is currently 'Under Review'. The aquifer type in the area is a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones'. The bedrock units underlying the Site are classified as 'Dark limestone & shale (calp)' (GSI, 2025) while the quaternary sediments classified as 'Till derived from limestones' (GSI, 2025). The level of vulnerability to groundwater contamination from human activities at the Site is classed as 'Low' (EPA, 2025). The subsoil beneath the Site is 'Man-made' and the SIS National Soils database classified the soil beneath the Site as 'Urban' (EPA, 2025).

5.2.2 Relevant Field Survey Results

A suite of surveys have been undertaken at the Site of the Proposed Development to date. However, this section provides results on the field surveys relevant to Appropriate Assessment. All survey details and results are contained in the Biodiversity Chapter of the EIAR submitted under separate cover with this application.

JBA Consulting carried out winter bird surveys at the Site between November 2020 and February 2021 (four visits on 30/11/2020, 17/12/2020, 07/01/2021 and 03/02/2021); and breeding bird surveys in April and May 2021 (15/04/2021 and 18/05/2021) (See Appendix I for full survey results). Ecological walkovers were carried out by DNV in 2023, 2024, and 2025.

The winter surveys recorded no SCI waterbird species utilising the Site. One Curlew (*Numenius arquata*) was recorded in flight on one occasion. The Curlew passed at 40-50m height over the site for a duration between 0-5 seconds and did not land within the Site.

Herring Gull (*Larus argentatus*) were recorded nesting on the roof of a building at the Site during the breeding bird surveys conducted by JBA in May 2021 and were noted to be nesting on a chimney of Tabor House during a Site visit in June 2025. Breeding herring gulls are a SCI for Ireland's Eye SPA, however, this breeding pair is unlikely to form part of the SPA assemblage considering the distance between the Site and the SPA (>14km), and the fact that this species widely use urban rooftops as a breeding resource.

The AA Screening Report (JBA, 2021) prepared by JBA Consulting for a previous planning submission (ABP-311302-21) concluded, based on their assessments and bird surveys, that the Site of the Proposed Development

is not located within any known flight line for any of the SCI species listed for the relevant SPA's, nor is it being used as an *ex-situ* site.

In summary JBA concluded:

- No Light-bellied Brent Geese *Branta bernicla hrota* were observed flying over the Site during the winter surveys and it was not considered to be within the flight line of this species i.e., there is no risk for collision with the new development.
- The only SCI species of note observed flying over the Site during the winter was Curlew, where one individual was seen at one occasion, passing the Site at a height of 40-50m.
- The rate of total individuals per hour from the entire survey is 0.1 / hour. The height of the proposed tallest building for the previous development application (ABP-311302-21) was 31.6m (this will also be the case for the current planning application), and thus, below the flight line of the Curlew. Therefore, the proposed development was not considered to be within the main flight line of Curlew.
- Given that the Site was not used as a feeding site by Brent Geese, that no other SCI bird species were recorded foraging or nesting within the Site (other than Herring Gull as mentioned previously), and that the Site was not observed to be within a known flight line for any of the SCI species; likely significant effects on European sites specifically relating to SCI bird species are not anticipated.

Bird surveys were conducted by DNV during the winter months in 2022/23 to determine the usage of the Site by wintering waterbird species. These bird surveys confirmed those of JBA's surveys in 2021/22 and recorded no wintering waterbirds utilising the Site. Species such as Herring Gull and Common Gull (*Larus canus*) were recorded in flight over the Site; however, none were recorded landing within the Site. The Site is not within any known flight lines of sensitive wintering waterbird species and no significant movement of birds over the Site was observed. As such, repeat winter bird surveys were not considered necessary.

Regarding breeding bird surveys; Bird surveys conducted over the summer months to date (summer 2024 and summer 2025 surveys), found several Amber-listed species were recorded on the Proposed Development Site. However, Swift (*Apus apus*) was the only Red-listed species recorded on Site during the breeding surveys. During both the breeding and Swift surveys carried out on Site, it was the considered opinion of both ornithologists present that Swifts were not using the buildings on this Site for nesting. In addition, Swift is not an SCI listed species for any nearby European protected sites. However, as a precautionary basis, impacts on these taxa will be avoided by scheduling site clearance works for the non-breeding season (October – February) as prescribed in the EIAR Biodiversity Chapter that will accompany the final application under separate cover.

5.2.3 Potential Sources of Impacts

The Proposed Development is not directly connected with or necessary to the management of European sites. However, the following elements of the Proposed Development were identified and assessed for their potential to cause likely significant effects on European sites.

- **Construction Phase** (Estimated duration: 34/35 months)
 - Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies.
 - Surface water run-off containing silt, sediments and/or other pollutants into the surface water drainage network.
 - Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater.
 - Increased noise, dust, vibrations and/or human presence as a result of construction activity.
 - Increased dust and air emissions from construction traffic.
- **Operational Phase**
 - Surface water run-off containing silt, sediments and/or other pollutants into the surface water drainage network.
 - Foul water from the Proposed Development.

- Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Increased lighting in the vicinity emitted from the Proposed Development.
- Increased human presence in the vicinity as a result of the Proposed Development.

5.2.4 Potential Pathways to European Sites

For the above listed potential sources of effects to have the potential to cause likely significant effects on any European site, a pathway between the source of potential effects (i.e., the Site of the Proposed Development) and the receptor is required. Potential impact pathways are discussed in the following sections in the context of the identified likely impact sources as identified in Section 5.2.3.

5.2.4.1 Direct Impacts

5.2.4.1.1 Hydrological

There are no surface waterbodies located within or directly adjacent to the Site of the Proposed Development. The closest waterbody to the Site is the River Dodder (EPA Code:09D01) approximately 250m to the south-east of the sewer works associated with the Proposed Development, along Eglinton Road, and ca.470m to the east of the main Site area.

Stormwater generated at the Site during the Construction and Operational Phases of the Proposed Development will discharge to the existing surface water system which in turn discharges to the River Dodder, and eventually Dublin Bay via the Liffey. A weak hydrological pathway therefore exists between the Site and European sites via the River Dodder. These include South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), Rockabill to Dalkey Island SAC (003000), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and the North-west Irish Sea SPA (004236). Potential surface water emissions during both the Construction and Operational Phases of the Proposed Development could enter the River Dodder, subsequently reaching these European sites.

Any adverse hydrological impacts could in turn have the potential to adversely affect QI / SCI species of the downstream European sites, including Otter (*Lutra lutra*) which is known to utilise the Dodder River and is an SCI species of the Wicklow Mountains SAC (002122). This pathway is therefore **assessed further in this Report**.

5.2.4.1.2 Hydrogeological

During groundworks and other construction activities at the Site, the ground will be exposed, and any potential accidental discharges could potentially migrate vertically downward to the underlying bedrock aquifer. The closest Sites located within the same groundwater body as the Proposed Development are Dublin Bay sites, and Rye Water Valley/Carton SAC (001398) although this SAC is upstream of the River Liffey.

Given the topography of the groundwater body and the WFD catchments, which generally discharge towards the east coast and are intercepted by a series of rivers, any such discharges from the Site are likely to flow eastwards towards the Dodder River rather than migrating laterally to the west.

Given that the Site is located at a distance from the European sites within Dublin Bay and is itself located in an area of predominantly low aquifer vulnerability, likely significant negative effects on the European sites within Dublin Bay are not anticipated; either from the Proposed Development on its own or in combination with other projects.

Therefore, due to the Site's location and the interception of groundwater flows by the River Dodder, there is no significant hydrogeological pathway linking the groundwater at the Site to the Rye Water Valley/Carton SAC, Dublin Bay sites, or any other European site and this pathway **will not be considered further in this Report**.

5.2.4.1.3 Air and Land

The Construction Phase of the Proposed Development could introduce dust and noise disturbance impacts transferable via air and land pathways, as well as increased lighting and human activity at the Site and in the vicinity of the Site during the Construction and Operational Phases.

As discussed in the following sections in more detail, the likely ZOI via air and land pathways is considered to be limited to surrounding areas within a maximum of approx. 400m from the Site boundary for any noise and dust sources, depending on prevailing weather conditions. Additionally, light spill and disturbance from human activity are considered to be limited to areas within the Site and habitats immediately adjacent to the Site's boundaries.

According to Institute of Air Quality Management (IAQM) *Guidance on the Assessment of Mineral Dust Impacts for Planning*. (IAQM, 2016), experience of the Working Group together with published studies and anecdotal evidence on the change in both airborne concentrations and the rate of deposition with distance, suggests that dust impacts will occur mainly within 400m of the operation, even at the dustiest of mineral sites. Adverse dust impacts from sand and gravel sites are uncommon beyond 250m and beyond 400m from hard rock quarries measured from the nearest dust generating activities. IAQM (2016) note that is commonly accepted that the greatest impacts will be within 100m of a source, and this can include both large (>30 µm) and small dust particles. The greatest potential for high rates of dust deposition and elevated particulate matter (PM10) concentrations occurs within this 100m distance.

IAQM note that their 2016 guidance applies to the operational phases of minerals developments e.g., quarries. Whilst these share some common features with construction activities, minerals sites can be on a significantly larger scale. The IAQM's 2014 *Guidance on the assessment of dust from Demolition and Construction* (Holman *et al.*, 2014) deals with construction dust assessment specifically and does not provide specific dust impact distances as such but assesses sensitivity to dust impacts at <20m and <50m ranges for ecological features; impact zones far smaller than that of mineral sites detailed in IAQM (2016).

Habitat loss / Alteration

The Site has been assessed for its potential to support wintering birds, including Brent Goose. Following completion of the desk and field studies; It is considered that habitats on Site do not provide suitable habitat for most wintering waterbird species. This is owing to a lack of waterbodies on Site e.g., pools, ponds or lakes, as well as a lack of suitable foraging grassland habitat on Site for use by birds for ex-situ feeding, such as the Light Bellied Brent Geese. The desk study results / assessment is provided below in detail.

The desk study showed that Light-bellied Brent Geese are highly selective in their choice of terrestrial foraging habitat during the winter months. Research consistently shows that these geese prefer large, open sites with clear sight lines and short, intensively managed amenity grassland, typically maintained at a sward height of less than 15 cm (King, 2010). These conditions allow geese to detect predators easily and move freely while grazing. In contrast, unmanaged grassland with a high sward height, such as that present on the Site, is unsuitable because tall vegetation obstructs visibility, restricts movement, and reduces access to the tender shoots and leaves that geese prefer.

The grassland at the Site of the proposed development is considered unsuitable due to its rank, unmanaged nature and high sward. As a result of this management regime, the grass is infrequently mown and possesses a sward height of >15cm. This unmanaged grassland was present on Site prior to the purchase of the Site by the applicant and was recorded again during the ecological surveys carried out by JBA Consulting and DNV from the period 2020-2025, inclusive (See Appendix I below).

Furthermore, findings of a Natura Impact Statement for St. Paul's College, Raheny, Dublin (2022) reinforce the conclusion that this Site does not provide suitable ex-situ foraging habitat for Light-bellied Brent Geese; whereby comprehensive wintering bird surveys had been undertaken between 2015 and 2022 at St. Paul's College which demonstrated that Brent Geese are not site-faithful to any single inland feeding location and instead rely on a wider network of short-sward, intensively managed grassland sites (Enviroguide Consulting, now DNV, 2022).

Evidence from GPS tracking studies in Dublin further supports this conclusion. Across two winter seasons (2018/19 and 2019/20), tagged Brent Geese showed a strong preference for sports pitches and school grounds, which are consistently maintained to short sward lengths and fertilised to promote growth throughout winter (Handby, 2022; GPS Tagging Report, pp. 10–14). These sites were among the top 20 most frequently used terrestrial locations, whereas unmanaged green spaces were generally avoided or used only opportunistically. For example,

Portmarnock Public Park recorded 594 GPS fixes in 2018/19 but only 83 in 2019/20 after its management regime changed to leave grass uncut for pollinator enhancement, rendering it unsuitable for grazing.

Urban constraints further reduce suitability at the Site for this species as buildings, tree lines, and other structures create visual barriers and limit the open aspect required by Brent Geese for predator avoidance and flock cohesion. The GPS Tagging report highlights that urban roosting birds exhibit larger foraging ranges (up to 35.5 km²) and travel significantly greater distances daily (mean 13–15 km) compared to rural counterparts, reflecting the patchy and unpredictable nature of urban resources (Handby, 2022, Chapter 2). This increased movement is energetically costly and driven by the need to locate suitable short-sward sites amid a fragmented urban matrix.

Moreover, resource selection modelling confirms that Brent Geese actively avoid urban green spaces as a habitat category, using them proportionally less than expected given their availability (Handby, 2022, Chapter 3). In contrast, sports pitches were selected at a higher frequency than availability, underscoring the importance of strict management regimes in determining site suitability. Proximity to refuge areas (SPAs) and the presence of buffer sites within 1 km were also significant predictors of site selection for peri-urban birds, suggesting that landscape configuration influences habitat use (GPS Tagging Report, Fig. 5).

Combined with the absence of short amenity grassland and the fragmented layout of green spaces, these factors make the proposed development site ecologically unsuitable for Brent Geese for foraging or roosting. The lack of open, intensively managed grassland and the presence of tall unmanaged vegetation all directly contradict the habitat characteristics identified as critical for Brent Geese in Dublin and other urban landscapes.

In conclusion, there are no European sites located within the noise and dust ZOI of the Proposed Development and the Site is not used for *ex-situ* foraging/ roosting habitat by QIs and/or SCIs of Dublin Bay SPAs and SACs. It is therefore concluded that there is no significant air/ land pathway linking the Proposed Development to any European sites and this pathway **will not be considered further in this Report**.

5.2.4.2 Indirect Impacts

5.2.4.2.1 Foul Water to Ringsend WwTP

During the Operational Phase, the Proposed Development will be served by Ringsend Wastewater Treatment Plant (WwTP). It is noted that there is a weak indirect hydrological pathway between the Site and European sites in Dublin Bay via this sewerage network, which will eventually be processed and discharge to Dublin Bay and the corresponding European sites of South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), Rockabill to Dalkey Island SAC (003000), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006), and North-west Irish Sea Marine SPA (004232).

As such the hydrological pathway provided by Operational Phase foul water treatment at Ringsend WwTP **is assessed further in this Report**.

5.2.4.2.2 Flightpaths & Collision Risk

Flightpath and collision risk were assessed given the proximity of the Site to nearby Special Protection Areas (SPAs). Tall structures such as buildings and electrical pylons can lead to fatal collisions with commuting bird species, particularly large and/or fast-flying waterbird species, such as large ducks, geese, swans and waders, and those with low manoeuvrability (Jenkins *et al.*, 2010).

As stated previously in this Report, the Site supports limited suitable habitat for species designated as SCI Species for nearby SPAs. In-flight collisions between SCI species and the Proposed Development are not deemed to pose a source of likely significant effects to the conservation objectives of the relevant SPAs, as detailed in the following sections.

Building Height

The Proposed Development entails a max height of 8 storeys in height (See Figure 3). Birds that commute across the city or in order to reach feeding grounds at various locations would tend to fly above this height and once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds flying in the vicinity of the buildings will simply fly around or over them.

With respect to SCI species listed for the SPAs assessed in this Report, which regularly use or travel over inland areas in Dublin (i.e., geese, gull species, duck species and a number of waders), these species navigate the urban environment with built structures daily. To put some context on some of their avoidance capabilities, in a different setting and for use in collision risk modelling for onshore wind turbines, an avoidance rate of 99.5% is applied for large gull species and an avoidance rate of 99.2% is applied for small gull species (Furness, 2019), which essentially means that 99.5% and 99.2% of gull flights, respectively, will avoid collision with a moving turbine. For curlew the avoidance rate applied is 98% (SNH, 2018). The risk of collision is even less with a static, clearly detectable building.

Building Appearance

The overall façades of the proposed structures are well broken up, with areas of glazing dispersed across a varied material composition (See Figure 3). The opaque materials proposed, such as coloured brick and metal cladding, provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. The overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is extremely low. These architectural design features are part of the overall design of the Proposed Development and are not included as specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard.

The Site is not within any known flight lines of sensitive wintering waterbird species and no significant movement of birds over the Site has been observed during the suite of bird surveys carried out at the Site to date.

As such, based on the insignificant heights of the proposed structures, their physical appearance, and the lack of significant flyover activity recorded during the bird surveys of the Site to date, it is deemed that SCI bird species do not have the potential to be significantly affected by the Proposed Development through in-flight collisions or flight-path obstructions. While the presence of the Proposed Development might alter flight patterns of bird species slightly to avoid the proposed building structures, the risk of collision is deemed to be extremely low. This impact would not result in any population level effect, or change in distribution, of any species, including any SCI species for SPAs within the ZOI of the Proposed Development. It is therefore concluded that there is no significant air/ land pathway linking the Proposed Development to any European sites, via bird – building collisions and flight path obstruction, and this pathway **will not be considered further in this Report.**



FIGURE 3. EXAMPLE OF THE PROPOSED BUILDING ELEVATIONS OF BLOCK C, SHOWING THE MIXED FAÇADE COMPOSITION AND INTERSPERSED AREAS OF GLAZING (OMP DRWG: 19037C-OMP-ZZ-ZZ-M3-A-0002).

5.2.5 Relevant European sites

A European site will only be at risk from likely significant effects where a S-P-R link of note exists between the Proposed Development Site and the European site. All of the European sites considered under the S-P-R method are listed in (Table 1).

TABLE 1. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE PATHWAYS BETWEEN THE PROPOSED DEVELOPMENT AND ANY RELEVANT EUROPEAN SITES. THOSE SITES WITH NOTABLE S-P-R LINKS ARE HIGHLIGHTED IN GREEN (IF ANY). QIS ARE TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (EEA, 2025)¹.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Source Receptor	Pathway-
Special Areas of Conservation (SAC)				
South Dublin Bay SAC (000210)	<p>Conservation Objectives Version 1.0 (NPWS, 2013a)</p> <ul style="list-style-type: none"> - Mudflats and sandflats not covered by seawater at low tide [1140] - Annual vegetation of drift lines [1210] - <i>Salicornia</i> and other annuals colonising mud and sand [1310] - Embryonic shifting dunes [2110] 	2.2 km east		Direct hydrological pathway and indirect hydrological pathway via Ringsend WwTP.
North Dublin Bay SAC (000206)	<p>Conservation Objectives Version 1.0 (NPWS, 2013b)</p> <ul style="list-style-type: none"> - Mudflats and sandflats not covered by seawater at low tide [1140] - Annual vegetation of drift lines [1210] - <i>Salicornia</i> and other annuals colonising mud and sand [1310] - Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] - Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] - Embryonic shifting dunes [2110] - Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] - Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] - Humid dune slacks [2190] - <i>Petalophyllum ralfsii</i> (Petalwort) [1395] <p>Standard Data Capture Form (EEA, 2025)</p> <ul style="list-style-type: none"> - Spartina Swards (<i>Spartinion maritimae</i>)[1320] - Embryonic shifting dunes [2110] 	6 km north-east		Direct hydrological pathway and indirect hydrological pathway via Ringsend WwTP.

¹ Where applicable, the full species list included in this table is as per the latest updated information as indicated, so either the Site Specific Conservation Objectives (SSCO) document for the site, or the latest Standard Data Forms (SDF) (EEA, 2025).

Site Name & Site Code	Qualifying Interests (* = priority habitats)	Distance to Site	Source Receptor	Pathway-
Rockabill to Dalkey Island SAC (003000)	<p>Conservation Objectives Version 1.0 (NPWS, 2013)</p> <ul style="list-style-type: none"> - Reefs [1170] - Common Harbour Porpoise (<i>Phocoena phocoena</i>)[1351] <p>Standard Data Capture Form (EEA, 2025)</p> <ul style="list-style-type: none"> - Grey Seal (<i>Halichoerus grypus</i>)[1364] - Common Seal (<i>Phoca vitulina</i>)[1365] - Bottlenose Dolphin (<i>Tursiops truncatus</i>)[1349] 	9.9 km east		Direct hydrological pathway and indirect hydrological pathway via Ringsend WwTP.
Rye Water Valley/Carlton SAC (001398)	<p>As per NPWS (2021):</p> <p>Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]</p> <p><i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]</p> <p><i>Vertigo moulinsiana</i> (Desmoulin's Whorl Snail) [1016]</p>	16.9km west of the Site.		Same groundwater body but screened out due to distance and interception by hydrological pathways.
Special Protected Area (SPA)				
South Dublin Bay and River Tolka Estuary SPA (004024)	<p>Conservation Objectives Version 1.0 (NPWS, 2015b)</p> <ul style="list-style-type: none"> - Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] - Oystercatcher (<i>Haematopus ostralegus</i>) [A130] - Ringed Plover (<i>Charadrius hiaticula</i>) [A137] - Grey Plover (<i>Pluvialis squatarola</i>) [A141] - Knot (<i>Calidris canutus</i>) [A143] - Sanderling (<i>Calidris alba</i>) [A144] - Dunlin (<i>Calidris alpina</i>) [A149] - Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] - Redshank (<i>Tringa totanus</i>) [A162] - Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] - Roseate Tern (<i>Sterna dougallii</i>) [A192] - Common Tern (<i>Sterna hirundo</i>) [A193] - Arctic Tern (<i>Sterna paradisaea</i>) [A194] - Wetland and Waterbirds [A999] 	2.2 km east		Direct hydrological pathway and indirect hydrological pathway via Ringsend WwTP.
North Bull Island SPA (004006)	<p>Conservation Objectives Version 1.0 (NPWS, 2015a)</p>	6 km north-east		Direct hydrological pathway and indirect hydrological pathway via Ringsend WwTP.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Source Receptor	Pathway-
	<ul style="list-style-type: none"> - Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] - Shelduck (<i>Tadorna tadorna</i>) [A048] - Teal (<i>Anas crecca</i>) [A052] - Pintail (<i>Anas acuta</i>) [A054] - Shoveler (<i>Anas clypeata</i>) [A056] - Oystercatcher (<i>Haematopus ostralegus</i>) [A130] - Golden Plover (<i>Pluvialis apricaria</i>) [A140] - Grey Plover (<i>Pluvialis squatarola</i>) [A141] - Knot (<i>Calidris canutus</i>) [A143] - Sanderling (<i>Calidris alba</i>) [A144] - Dunlin (<i>Calidris alpina</i>) [A149] - Black-tailed Godwit (<i>Limosa limosa</i>) [A156] - Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] - Curlew (<i>Numenius arquata</i>) [A160] - Redshank (<i>Tringa totanus</i>) [A162] - Turnstone (<i>Arenaria interpres</i>) [A169] - Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] - Wetland and Waterbirds [A999] 			
North-West Irish Sea (004236) SPA	<p>As per NPWS (2025):</p> <p>Red-throated Diver (<i>Gavia stellata</i>) [A001]</p> <p>Great Northern Diver (<i>Gavia immer</i>) [A003]</p> <p>Fulmar (<i>Fulmarus glacialis</i>) [A009]</p> <p>Manx Shearwater (<i>Puffinus puffinus</i>) [A013]</p> <p>Cormorant (<i>Phalacrocorax carbo</i>) [A017]</p> <p>Shag (<i>Phalacrocorax aristotelis</i>) [A018]</p> <p>Common Scoter (<i>Melanitta nigra</i>) [A065]</p> <p>Little Gull (<i>Larus minutus</i>) [A177]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Common Gull (<i>Larus canus</i>) [A182]</p> <p>Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]</p> <p>Herring Gull (<i>Larus argentatus</i>) [A184]</p> <p>Great Black-backed Gull (<i>Larus marinus</i>) [A187]</p> <p>Kittiwake (<i>Rissa tridactyla</i>) [A188]</p> <p>Roseate Tern (<i>Sterna dougallii</i>) [A192]</p> <p>Common Tern (<i>Sterna hirundo</i>) [A193]</p> <p>Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p> <p>Little Tern (<i>Sterna albifrons</i>) [A195]</p> <p>Guillemot (<i>Uria aalge</i>) [A199]</p>	6 km north-east	Direct hydrological pathway and indirect hydrological pathway via Ringsend WwTP.	

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Source Receptor	Pathway-
	Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204]			
Wicklow Mountains SAC (002122)	<p>As per NPWS (2025):</p> <p>Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]</p> <p>Natural dystrophic lakes and ponds [3160]</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]</p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]</p> <p>Calcareous rocky slopes with <i>chasmophytic vegetation</i> [8210]</p> <p>Siliceous rocky slopes with <i>chasmophytic vegetation</i> [8220]</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>	13km south / southwest	Potential hydrological / land & air affects on contaminated water run-off	indirect Otter via surface water run-off

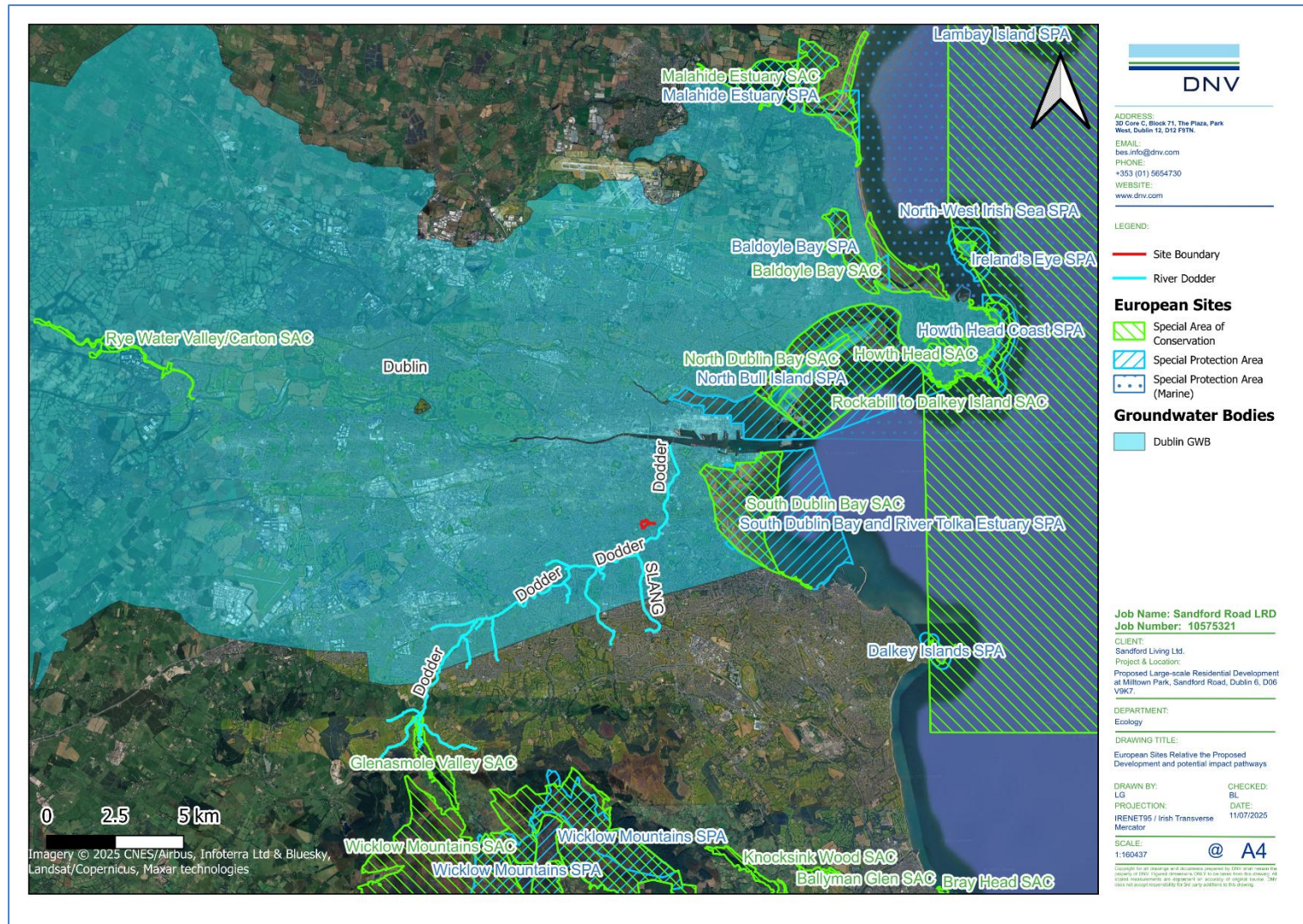


FIGURE 4. EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT AND POTENTIAL IMPACT PATHWAYS (QGIS, 2025).

5.3 Assessment of Likely Significant Effects

The following sections discuss the potential for likely significant effects on the relevant European site(s), taking into consideration the QIs, SCIs and SSCOs, and assesses whether the Proposed Development has the capacity to adversely affect the integrity of these European sites. Furthermore, due consideration shall be given to species not formally identified but which may be present within the relevant European sites and adversely effected by the Proposed Development, provided that those potential impacts are likely to affect the conservation objectives of the designated site. The potential for likely significant effects that may arise from the Proposed Development was considered through the use of key indicators as detailed in Section 5.2.3 above.

5.3.1 Habitat Loss and Alteration

The Proposed Development is not located within any European site and therefore there will be no direct loss or alteration of QI habitats as a result of the Proposed Development.

The initial assessment of the quality and composition of the habitats present at the Site (hardstanding, rank grassland and woodland habitats), along with the results of the bird surveys conducted over 2021/2022 winter by JBA Consulting and 2022/23 winter by DNV, confirms that it is unsuitable as an *ex-situ* feeding/roosting resource for the SCI species listed for the relevant SPAs (See 5.2.2 for details of these survey results).

Herring Gull were recorded nesting on the roof of a building at the Site during the breeding bird surveys conducted by JBA in May 2021 and by DNV in June 2025. Breeding herring gulls are a SCI for Ireland's Eye SPA, however, this breeding pair is unlikely to form part of the SPA assemblage considering the distance between the Site and the SPA (>14km), and the fact that this species widely use urban rooftops as a breeding resource.

As such the potential for likely significant effects in this regard is screened out at this stage.

5.3.2 Habitat / Species Fragmentation

Habitat fragmentation has been defined as the 'reduction and isolation of patches of natural environment' (Hall *et al.*, 1997 cited in Franklin *et al.*, 2002) usually due to an external disturbance such that an alteration of the spatial composition of a habitat occurs that alters the habitat and 'create[s] isolated or tenuously connected patches of the original habitat' (Wiens, 1989 cited in Franklin *et al.*, 2002). This results in spatial separation of habitat units which had previously been in a state of greater continuity.

As there will be no habitat loss within any European sites, it is not considered that direct habitat fragmentation will arise as a result of the Proposed Development. In addition, for the reasons outlined in section 5.3.1, there will be no fragmentation of QI habitat or potential *ex-situ* habitat in the vicinity of the Site. **As such the potential for likely significant effects in this regard is screened out at this stage.**

5.3.3 Disturbance and / or Displacement of Species

The Proposed Development is not considered to have the capacity to cause any likely significant effects in terms of disturbance or displacement of any species within any European site. However, it is noted that the Proposed Development, whose surface waters will discharge to the River Dodder, is known to support populations of the Eurasian otter, a species listed under Annex IV of the EU Habitats Directive. However, the River Dodder is not designated as a European site i.e., it is not part of the Natura 2000 network and is not classified as a Special Area of Conservation (SAC) or Special Protection Area (SPA).

Otter surveys of the River Dodder have been carried out in the past, such as the Dublin City Otter Survey (2018-2019), and, more recently an otter survey which was undertaken on the 9th of April 2025 along a 600 m section of the River Dodder at Smurfit Paper Mills, Clonskeagh. These surveys conclusively showed that otter is actively using the river Dodder for resting, commuting, and foraging purposes. While the Site is located >12km away from Wicklow Mountains SAC (002122) there is the potential for otter, which is an SCI species of this SAC to commute / forage in the River Dodder, owing to home ranges for this species of up to 20km in some instances according to The Vincent Trust (n.d.) and Marnett *et al* (2011).

The Development itself is set back from the river (>250m) with an intervening urban/vegetative buffer, and does not involve any direct works within or adjacent to the riparian corridor. As such, there will be no direct disturbance to otter habitat.

During both the construction and operational phases, standard best practice measures will be implemented to manage surface water and prevent pollution. These measures will ensure that no silt, hydrocarbons, or other contaminants enter the watercourse, thereby avoiding any potential impact on water quality or otter foraging and commuting routes.

Furthermore, significant water quality impacts arising from the Proposed Development are ruled out in Section 5.3.5 below. Accounting for this, and, given the absence of direct interaction with the river, the non-designated status of the River Dodder, and the application of best practice construction and operational controls, it is concluded that the Proposed Development will not result in any adverse effects on otters or their habitat.

Therefore, the Proposed Development does not have the capacity to cause any likely significant effects in terms of disturbance or displacement of any species within any European site (see Section 5.2.4.1.3).

5.3.4 Changes in Population Density

The Proposed Development does not have the capacity to cause any significant changes in the population density of any species within any European site.

5.3.5 Changes in Water Quality and Resource

As detailed in the following Sections, hydrological connections exist linking the Proposed Development to the relevant European sites in Dublin Bay; via the receiving surface water network discharging to the River Dodder and operational foul waters which will be directed to Ringsend WwTP for treatment prior to discharge into the bay.

5.3.5.1 Construction Phase: Surface Water

Stormwater generated at the Site during the Construction phase will discharge to the existing surface water system which in turn discharges to the River Dodder, and eventually Dublin Bay via the Liffey.

As a result, there is potential for surface waters arising from the Development to cause impacts on receiving waters within protected areas, during both the Construction and Operational phase of the Proposed Development. However, It is considered that, in the unlikely event silt-laden stormwater from construction activities or hydrocarbon-contaminated water from a localised vehicle leak enters the public stormwater sewer untreated, the environmental impact would be minimal. Suspended solids are expected to naturally settle within the drainage system, while hydrocarbons would dilute to background levels before reaching any open water, due to the distance to receiving water bodies. This outcome would remain within the water quality objectives set out in S.I. No. 272 of 2009, S.I. No. 386 of 2015, and S.I. No. 77 of 2019.

Similarly, during the operational phase, any minor hydrocarbon leak from a vehicle would involve a low volume of contaminants. Combined with the attenuation capacity of the public stormwater system, this would result in hydrocarbons diluting to background levels, with no likely exceedance of the relevant water quality standards.

Furthermore, the cumulative impact of surface water runoff from the proposed development, in combination with other potential developments, is not expected to be significant. Even under a worst-case scenario involving a 70-litre petrol leak during operation, the design's attenuation measures ensure compliance with the applicable water quality objectives.

Foul drainage during construction from staff welfare facilities will be tankered off site to a licensed facility until a connection to the public foul drainage network has been established.

Therefore, given the physical intervening distance and the nature of the hydrological pathway as discussed above (i.e., the local receiving sewer infrastructure and River Dodder), it can be concluded that there will be no likely significant effects on the water quality of any of the European sites within Dublin Bay during the Construction phase

of the Proposed Development. **As such the potential for likely significant effects in this regard is screened out at this stage.**

5.3.5.2 Operational Phase Surface Water

The potential for Operational Phase surface water discharges to lead to likely significant effects at downstream European sites (i.e., South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Island SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA and North-West Irish Sea SPA) is deemed to be negligible based on the physical intervening distance between the Site and Dublin Bay and the suite of SuDS measures that have been included in the project design as per best practice and local policy requirements (see Section 2.3.2). As noted in Section 3.1.1, the Court of Justice of the European Union has confirmed that standardised embedded mitigation measures (in this case SuDS in large-scale residential developments), that are incorporated into the design of a project and which may result in a reduction of effects on European sites, but where the primary reason of said embedded mitigation is not to protect a European site, may be taken into account when screening for AA.

Irrespective of SuDS, likely significant effects at downstream European sites due to Operational Phase surface water run-off are deemed to be unlikely considering the relatively low volume of any surface water run-off or discharge events that would occur from the Proposed Development Site during its operational lifetime, relative to the receiving surface water and marine environment in Dublin Bay, and given the level of mixing, dilution and dispersion of any surface water run-off/discharges from the Site that would occur within the receiving waters of Dublin Bay and the Irish Sea.

Furthermore, the HRA (AWN, 2025) states that in a worst-case scenario where SuDS are not considered in the design, there will be no perceptible risk to any European sites given the distance from the Site to Dublin Bay protected areas (a minimum of 2.2 km) and that the potential contaminant loading will be attenuated, diluted and dispersed near source area. **As such the potential for likely significant effects in this regard is screened out at this stage.**

5.3.5.3 Foul waters from Ringsend WwTP

The Proposed Development will be served by separate foul water and surface water sewers during its Operational Phase. It is noted that there is a weak hydrological connection between the Site and European sites in Dublin Bay via this sewerage network, which will eventually be processed and treated at Ringsend WwTP prior to discharge to Dublin Bay.

The potential for foul water generated at the Site of the Proposed Development to reach Dublin Bay and result in significant effects to European Sites is deemed negligible due to the following:

- The ongoing upgrade works to Ringsend WwTP which will increase the capacity of the facility from 1.6 million PE to 2.4 million Population Equivalent PE (see section 5.4.3 for further details).
- The increase of the population equivalent (PE) load at the facility as a result of the Proposed Development, assuming each PE unit was not previously supported by the WwTP, is considered to be an insignificant increase in terms of the overall scale of the facility. The increased load does not have the capacity to alter the effluent released from the WwTP to such an extent as to result in likely significant effects on European sites in Dublin Bay. The potential for in-combination effects relating to foul water treatment at Ringsend WwTP is discussed in Section 5.4.3.
- It is considered that significant effects on marine biodiversity and the European Sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (see section 5.4.3 for further details).

It is therefore deemed that there is no potential for likely significant effects in the relevant Dublin Bay European sites to occur, as a result of foul waters generated at the Site during its operational lifetime. **As such the potential for likely significant effects in this regard is screened out at this stage.**

5.4 Potential for In-combination Effects

5.4.1 Existing Planning Permissions

A search of planning applications located within 500m of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie) and Dublin City Council's Planning Application Map. This distance was deemed appropriate based on the location of the Site of the Proposed Development and the types of other developments present in the area. However further justification for this radius has been included below:

Justification for 500m radius for in-combination impact assessment in urban areas

The selection of a 500m radius for assessing cumulative biodiversity effects is informed by guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM), which recommends that spatial boundaries in EclA should be ecologically meaningful and proportionate to the scale and nature of the Proposed Development.

Key Justifications:

1. Ecological Relevance: The 500m buffer encompasses adjacent habitats and ecological corridors that may be functionally connected to the Proposed Development site. This includes a variety of habitats that are used by mobile species such as birds, bats, and otters. These species may be sensitive to cumulative pressures such as noise, light, and habitat fragmentation.
2. Urban Context and Development Density: In urban and peri-urban settings, a 500m radius is commonly used² to capture developments that may contribute to shared pressures on biodiversity. This distance is sufficient to include projects with overlapping construction or operational phases that could interact with the Proposed Development in terms of disturbance, pollution, or habitat loss.
3. Best Practice and Proportionality: CIEEM guidance³ emphasizes that the spatial scope of cumulative assessments should be proportionate to the likely zone of influence of the project. A 500m radius strikes a balance between ecological thoroughness and practical feasibility, ensuring that relevant developments are considered without diluting the analysis with distant projects of negligible relevance.
4. Planning Precedent: The 500m buffer aligns with precedent in Irish planning practice, where cumulative assessments for urban development's often adopt this scale to evaluate interactions with nearby infrastructure and land-use changes⁴.

As part of the in-combination assessment, any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. In the interest of robustness, Long-term developments granted/submitted outside of this time period (and within 6km of the Site) were also considered where applicable. The search determined there were numerous small scale planning applications in the area for modifications to existing premises including extensions and development of new windows. The larger, more recent applications are detailed in Table 2.

It is noted that the below listed planning applications were all accompanied by the relevant environmental assessments or conditions that detail the potential impacts and the mitigation measures required to ensure the developments do not have a significant effect on European sites, alone or in-combination with other developments. In addition, DCC granted permission for much of the below planning applications following evaluations of the potential ecological and environmental impacts of each application.

On examination of the below, it is considered that there is no potential for the Proposed Development to act in-combination with other developments in the vicinity that could cause likely significant effects on the above European sites.

² Example: [Appendix D - EclAR.pdf](#)

³ Chartered Institute of Ecology and Environmental Management (CIEEM). (2018, updated 2022). Guidelines for Ecological Impact Assessment in the UK and Ireland. Version 1.3.

Available at: <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/>

⁴ Chapter 21 – Cumulative Impacts, Bray Public Transport Improvement Scheme (2025).

Available at: <https://brayscheme.ie/wp-content/uploads/sites/11/2025/07/Chapter-21-Cumulative-Impacts-1.pdf>

TABLE 2. ASSESSMENT OF POTENTIAL IN-COMBINATION EFFECTS OF THE PROPOSED DEVELOPMENT AND OTHER DEVELOPMENTS PENDING OR GRANTED PERMISSION IN THE LAST 5 YEARS (2017-2022) WITHIN 500M OF THE SITE.

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
<p>Reference: 3886/21</p> <p>Granted: 04/03/2022</p>	<p>Permission for development of an Integrated Care Facility on the existing Healthcare Campus at Clonskeagh Hospital, Clonskeagh Road, Dublin 6. The development will consist of:</p> <ol style="list-style-type: none"> 1. The construction of a 402 sq metre single storey modular type building, ramps, hard standings and associated works. 2. The reconfiguration of existing parking and provision of 4 additional parking spaces to serve the facility. 3. All associated drainage, site development and landscaping works. 	Ca.150m south	<p>The Planner's Report for this development, dated 25/01/2022, concluded that AA was not required due to the nature and scale of the development and the distance from any European site.</p> <p>No potential for in-combination effects.</p>
<p>Reference: 3116/22</p> <p>Granted: DCC decided to Grant Permission on 18th May 2022.</p> <p>Final grant on 30th June 2022</p>	<p>Planning permission for the development will consist of the construction of a two-storey archive storage and office building with c.765 sq. m of combined floorspace provided including the following: (i) a reception area, an oratory, an archive storage room, research reading room, offices, storage rooms, staff canteen, toilets, shower, passenger lift, audio room and ancillary space; (ii) rooflights, photovoltaic panels and lift over-run at roof level; (iii) 9 No. parallel car parking bays along the existing roadway with the existing fence relocated to the site boundary and 15 No. new cycle parking spaces; (iv) residual car parking, hard and soft landscaping, heat pump and all associated site development works.</p>	Ca. 23m south, directly on the opposite side of road leading to Cherryfield Avenue Upper.	<p>The Planner's Report for this development, dated 20/05/2022, concluded that AA was not required due to the nature and scale of the development and the distance from any European site.</p> <p>No potential for in-combination effects.</p>
<p>Reference: 4115/21</p>	<p>The proposed development will consist of the following: Demolition of the existing buildings on site, with a total combined gross floor area (GFA) of 1,739 sq.m; Construction of a Build-to-Rent (BTR) residential development, comprising 97 No. BTR apartments with a mix of 48</p>	Ca. 145m south	<p>An AA Screening Report was prepared as part the application by DNV (then</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
<p>Decision:</p> <p>Refused/ under appeal ACP-313048-22 and subsequently</p> <p>Granted by An Coimisiún Pleanála on 26th July 2025</p>	<p>No. 1 bed units and 49 No. 2 bed units in 3 No. blocks of part 3, part 4, part 5 and part 6 storeys in height, over basement level, including resident support and amenity facilities. The total GFA, including the basement level, of the proposed development is 9,216 sq. m; Block A, fronting Milltown Road, comprises 23 no. BTR units including 9 No. 1 bed units and 14 No. 2 bed units in a part 3, part 4 and part 5 storey building, over a basement level. Block A and Block B will be connected by a bridge link from first to fourth-floor levels. Resident support and amenity facilities are proposed at ground floor and basement level of Block A. Balconies are proposed on the north, east and south elevations; Block B adjoins Block A to the east and Block C to the west, comprises 34 No. BTR units including 14 No. 1 bed units and 20 No. 2 bed units, in a part 4, part 5 and part 6 storey building, over a basement level. Balconies are proposed on the north and south elevations, and terraces are proposed on the south elevation; Block C adjoins Block B to the east, comprising 40 No. BTR units including 25 No. 1 bed units and 15 No. 2 bed units, in a part 4, part 5 and part 6 storey building, over a basement level. Balconies are proposed on the north and south elevations, and terraces are proposed on the south and west elevations; The development includes ancillary resident support and amenity facilities for the BTR residential units with a total floor area of 302 sq. m, including a co-working area, meeting room, coffee dock, lounge and concierge at ground floor level and a gym, shared kitchen, media room and parcel store at basement level; The proposal includes communal open space and public open space, including improvements to the public realm and a shared space with an entrance plaza / set down area on the existing access road from Milltown Road; The basement level contains 47 No. car parking spaces, 2 No. motorcycle spaces and 150 No. cycle spaces. The basement level also includes bin storage, cores and plant rooms;</p> <p>The proposal includes 54 No. cycle parking spaces (including 4 No. cargo spaces) at surface level, a turning point, a new vehicular access to the basement level from Milltown Road, and associated improvements to Milltown Road (which includes alterations to the existing footpaths / public road, with relocation of the existing pedestrian crossing and bus stop, which are external to the planning application site boundary and subject to agreement with the Planning Authority); The proposal includes an ESB substation and associated set down</p>		<p>known as Enviroguide Consulting) and concluded no likely significant effects to European Sites were likely to occur.</p> <p>No potential for in-combination effects.</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
	area, landscaping, boundary treatment, lighting, PV panels, site services and all associated site works.		
<p>Reference: 3930/21</p> <p>Granted: 14th May 2022</p>	<p>Planning permission for the following development:-Demolition of 283 sq. m of existing commercial buildings,-Erection of six, two-storey (plus attic) townhouses,-8 car parking spaces, and all associated site works (including drainage).</p>	<p>Ca. 42m west/northwest</p>	<p>The Planner's Report for this development, dated 09/05/2022, concluded that AA was not required due to the nature and scale of the development and the distance from any European site.</p> <p>No potential for in-combination effects.</p>
<p>Reference: 4578/22</p> <p>Granted: 27th January 2025.</p> <p>Subject to Third-Party Appeal. Granted by An Coimisiún Pleanála on 18th January 2024.</p> <p>Decision: Decision quashed by Order of the High Court</p>	<p>Planning permission for a Build to Rent residential development on lands at 'Dunelm', Rydalmount, Milltown Road, Dublin 6. The site is located to the east of the Green Luas line, to the south of residential dwellings at No's 1 and 2 Rydalmount and east of the residential dwelling known as 'Kadiv' at Rydalmount, Milltown Road.</p> <p>The proposed Build to Rent residential development will consist of the following:</p> <ul style="list-style-type: none"> • Demolition of the existing building (comprising the residential dwelling known as 'Dunelm') and structures on site; • Construction of a Build-to-Rent (BTR) residential development, comprising 63 No. BTR apartments with a mix of 5 No. studio units, 27 No. 1 bed units, 30 No. 2 bed units and 1 No. 3 bed unit in two No. blocks (Block A and Block B), including resident support and amenity facilities; 	<p>Ca. 907m southwest</p>	<p>An AA Screening Report was prepared as part the application by DNV (then known as Enviroguide Consulting) and concluded no likely significant effects to European Sites were likely to occur.</p> <p>No potential for in-combination effects.</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
<p>and is remitted to An Coimisiún Pleanála under new case number ACP Ref. PL29S.322089. Still awaiting decision at the time of writing..</p>	<ul style="list-style-type: none"> • Block A, to the south of the site, comprises 55 No. BTR units, including 1 No. studio, 27 No. 1 bed units, 26 No. 2 bed units and 1 No. 3 bed units, in a part 4 to part 6 storey, over lower ground floor and basement level building (maximum of eight levels to Milltown Road). Resident support and amenity facilities are proposed at basement, ground and fifth-floor level. Balconies are proposed on the northwest, southwest, southeast and northwest elevations; • Block B, to the northwest of the site, comprises 8 No. BTR units, including 4 No. studio units and 4 No. 2 bed units, in a 4-storey building. Balconies are proposed on the south, east and north elevations. Block A and Block B will be connected by a bridge link at first to third-floor level; • The development includes ancillary resident support and amenity facilities for the BTR residential units, with a total floor area of 252.5 sq. m, including a large item storage area and a bike and bin store at basement level, concierge/management area and foyer area at ground floor level and lounge/ residential function room at a fifth-floor level all within Block A and a pavilion communal amenity building to the north of Block A; • The proposal includes communal open space at ground level and a communal roof terrace at fifth-floor level of Block A; • The basement level (Block A) contains 10 No. car parking spaces, 1 No. motorcycle space, 6 No. e-scooter spaces and 98 No. cycle spaces (including 2 No. cargo spaces). The basement level also includes bin storage, a storage room for apartments and cores. A generator room, sprinkler tank room and water storage tank room are proposed at lower ground floor level; • The proposal includes 32 No. cycle parking spaces and 2 No. car parking spaces at surface level, accessed from the existing access road and new vehicular access to the basement level from Milltown Road; • The proposal includes associated public realm works to Milltown Road, including alterations to the existing footpaths/ public road, a new signalised junction incorporating advanced cycle stacking lanes in the westbound direction, set back of the existing road median, provision of a new signalised pedestrian crossing of Milltown Road, provision of an 		

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
	<p>uncontrolled pedestrian crossing of the development access junction and associated signals, tactile paving and road markings;</p> <ul style="list-style-type: none"> The proposal includes an ESB substation and associated set down area, landscaping, boundary treatment, PV panels, green roofs and a plant enclosure at roof level, site services and all associated site works necessary to facilitate the development. 		
<p>Reference: WEB2190/24</p> <p>Granted: 01st August 2024</p> <p>Decision: Third Party Appeal to An Bord Pleanála Submitted on 30th August 2024 (ABP-320695-24). Granted permission on 23rd July 2025.</p>	<p>Permission is being sought for:</p> <ul style="list-style-type: none"> -Demolition of 169 sq.m of existing commercial buildings. -Erection of 6 two-storey (plus attic) townhouses (as previously approved). -6 car parking spaces and associated site works (including drainage). 	6.01km west	<p>The Planner's Report for this development, dated 06/08/2024, stated: that no screening exercise for Appropriate Assessment has been carried out by the Applicant, in accordance with the requirements of Article 6 (3) of the EU Habitats Directive (92/43/EEC). Having regard to the nature and scale of the proposed works, the Planning Authority can conclude that no appropriate assessment issues arise. The proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on any European site within the 15km zone of influence.</p> <p>Concluding: It is the opinion that the application for planning</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
			<p>permission for the proposed development does not require an Appropriate Assessment.</p> <p>As a result, no potential for in-combination effects are foreseen.</p>
<p>Reference: 4283/24</p> <p>Granted: DCC decided to Grant Permission on 8th November 2024</p> <p>Final grant 16th December 2024</p>	<p>Permission is being sought for development a protected structure, comprising construction of a 72 sqm one bed two storey mews with access onto Marlborough Lane, Dublin 4, and all associated services and site works</p>	<p>6.02km west</p>	<p>The Planner's report states: Having regard to the nature and scale of the proposed development, and the distance to the nearest European site, it is considered that significant effects are not likely to arise, either alone or in combination with other plans and projects that will result in significant effects to any Natura 2000 area. A full Appropriate Assessment of this project is therefore not required.</p> <p>Accounting for the above, in-combination impacts are not foreseen.</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
<p>Reference: WEB2190/24</p> <p>Granted: DCC Decided to Grant Permission on 18th November 2024</p> <p>Final grant on 21st January 2025</p>	<p>Damon McCaul (Headmaster) intends to apply for permission for development at Gonzaga College, Sandford Road, Dublin 6, D06 KF95.</p> <p>The development will consist of the internal reconfiguration and full renovation of an existing 2 storey science block (c. 830 sq m) and the construction of a new 3 storey extension with a rooftop observatory (c. 1,431 sq m) all accommodating a new Science, Technology, Engineering, Arts, and Mathematics (STEAM) facility, located to the north-east of the college. The extension will connect to the existing 2 storey science building to the south via a double-height atrium and to the existing Sandford Grove House (educational use) to the west via a new glazed walkway at second floor level.</p> <p>The development will also include: the removal of an external fire escape and associated minor works to the eastern facade of Sandford Grove House; works to the hard standing areas to the north and north-west of the college to provide a reconfigured and landscaped car parking area for 13 no. staff parking spaces (incl. 1 no. accessible space and 3 no. electric charging point), bus set-down spaces and bicycle parking; and the provision of a new ESB substation and switch-room (c. 25 sq m) located to the west of the college.</p> <p>The development will also comprise hard and soft landscaping; piped infrastructure and ducting; drainage infrastructure; green roofs; changes in levels and all associated site development and excavation works above and below ground.</p>	<p>Ca.240m south-east</p>	<p>The Planner's Report for this development, dated 21/11/2024, concluded that AA was not required due to the nature and scale of the development and the distance from any European site.</p> <p>No potential for in-combination effects.</p>
<p>Reference: WEBLRD6063/25-S3 (ACP Ref. LH29S.323142)</p>	<p>The proposed development comprises the following:</p> <ul style="list-style-type: none"> • Site clearance and demolition of extensions to rear of Nos. 85, 87, 89, 93, 95, 97, 99, and 101 Clonskeagh Road, and the side and rear extension of No. 103 Clonskeagh Road. All other buildings previously on the application site were demolished under Reg. Ref.: 2620/14, 	<p>4.74k northwest</p>	<p>While a decision is currently pending with ACP following appeal, it should be noted that the appeal was not on grounds of conservation/ecological concerns, and that the</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
<p>Granted:</p> <p>DCC decided to Grant Permission on 12th November 2025.</p> <p>Decision:</p> <p>Third-Party Appeal to An Coimisiún Pleanála lodged on 25th July 2025. Still awaiting decision at the time of writing.</p>	<p>as amended by Reg. Ref.: 2308/16 / ABP Ref.: PL29S.247062 and Reg. Ref.: 3159/17 / ABP Ref.: 300024-17;</p> <ul style="list-style-type: none"> • Construction of a purpose-built student accommodation (PBSA) and residential development in 5 no. blocks (Blocks 1-5) ranging from part 1 to part 7 no. storeys in height above a lower ground level, and extension and renovation of 14 no. existing residential dwellings at Clonskeagh Road; • The proposed development includes 439 no. PBSA bedspaces in Blocks 2-5 (including 133 no. studios and 306 no. bedspaces in 40 no. clusters, comprising 4 no. 6 bed clusters, 6 no. 7 bed clusters, and 30 no. 8 bed clusters); and 16 no. residential apartments in Block 1 (including 1 no. studio, 4 no. 1 beds, and 11 no. 2 bed apartments). The PBSA includes ancillary student amenities at lower ground and upper ground levels, including a reception, lounge, gym, yoga studio, games room, cinema room, dining room, laundry, office, study and meeting rooms. All PBSA clusters are served by a communal living / kitchen / dining room. The development also includes floorspace for Class 10 (community/arts) and/or Class 11 (cultural) uses within Block 1, and café use within Block 2; • Block 1, which fronts onto Clonskeagh Road to the west of the site, comprises 16 no. residential apartments (1 no. studio, 4 no. 1 beds, and 11 no. 2 beds), in a part 1 to part 4 storey building, above lower ground level. An external communal roof terrace is proposed at 3rd floor level on the northern, western and southern elevations. Floorspace for Class 10 (community/arts) and/or Class 11 (cultural) uses (with a Gross Floor Area (GFA) of 604 sq.m) is located at lower and upper ground floor level. Balconies are provided on the eastern and western elevations. A double ESB substation and switch rooms are located at upper ground floor level and a plant area is proposed at roof level; • Block 2, to the north-east of the site, comprises 103 no. purpose-built student bedspaces (including 1 no. 6 bed cluster, 3 no. 7 bed clusters, and 4 no. 8 bed clusters, and 44 no. studios), in a part 3 to part 6 storey building, above lower ground level. Ancillary internal student amenities are provided at upper and lower ground levels. Café use is also provided at upper ground level. A plant area is proposed at upper ground level and at roof level; • Block 3, to the east of the site, comprises 121 no. purpose-built student bedspaces, (including 1 no. 6 bed cluster, 1 no. 7 bed cluster, and 8 no. 8 bed clusters, and 44 no. 		<p>planner's report for the application stated the following, effectively ruling the potential for in-combination impact unlikely:</p> <p>The Planning Authority having examined the information provided and can therefore satisfactorily conclude that with the implementation of the proposed mitigation measures set out, that the proposed works do not pose a risk adversely affecting the integrity of any Natura 2000 site, either alone or in-combination with other plans or projects.</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
	<p>studios), in a part 3 to part 7 storey building, above lower ground level. Ancillary internal student amenities are provided at lower ground level. A plant area is proposed at upper ground floor level and at roof level;</p> <ul style="list-style-type: none"> • Block 4, to the south-east of the site, comprises 90 no. purpose-built student bedspaces (including 2 no. 6 bed clusters, 2 no. 7 bed clusters, and 8 no. 8 bed clusters), in a part 5 to part 6 storey building, above lower ground level. A plant area is proposed at roof level; • Block 5, to the south of the site, comprises 125 no. purpose-built student bedspaces (including 10 no. 8 bed clusters, and 45 no. studios), in a part 5 to part 6 storey building, above lower ground level. A plant area is proposed at roof level; • The lower ground level also contains car and cycle parking, and ancillary facilities including plant rooms, waste storage areas and block cores. A total of 33 no. car parking spaces are provided (14 no. student accommodation spaces, 16 no. residential spaces, 2 no. community/arts/cultural use spaces, and 1 no. car share space), and 2 no. motorcycle spaces. A total of 575 no. cycle parking spaces are provided, including 472 no. secure cycle parking spaces (440 no. student accommodation spaces, 28 no. residential spaces, and 4 no. community/cultural use spaces) located at lower ground level, and 103 no. short stay visitor cycle parking spaces (88 no. student accommodation spaces, 8 no. residential spaces, and 7 no. community/arts/cultural use spaces) provided at surface level; • The development also includes the extension and renovation of the 14 no. existing residential dwellings at Nos. 59, 61, 63, 65, 73, 85, 87, 89, 93, 95, 97, 99, 101 and 103 Clonskeagh Road, including lower / ground and ground / first floor rear extensions and roof terraces at 1st floor level on the eastern elevations of Nos. 99, 101 and 103 Clonskeagh Road, (providing 1 no. 1 bed, 9 no. 2 beds, and 4 no. 3 bed houses), associated external and internal alterations, alteration to front and rear private open space, including bin shelters fronting Clonskeagh Road, and a bin store structure adjoining No. 65 Clonskeagh Road; • The proposed development will also provide communal open space for the PBSA and the residential apartments, outdoor space for the community/arts/cultural use, hard and soft landscaping, boundary treatments, and a biodiversity corridor along the River Dodder along the full length of the eastern site boundary; 		

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
	<ul style="list-style-type: none"> • The proposal includes 2 no. vehicular and pedestrian / cycle entrances from Clonskeagh Road (a vehicular access to the podium level and a ramped cycle access to the lower ground level to the north of the site, and a vehicular ramped access to the lower ground level to the southern part of the site), and associated public realm works (which includes alterations to the existing footpaths / public road, internal vehicular and pedestrian routes, boundary treatments, and utility connections); • The development also provides for flood defence and alleviation works, including flood walls along the eastern site boundary, a catchment trench fronting Clonskeagh Road to the west of Block 1, flood defence wall to replace the existing railing to the western side of Clonskeagh Bridge, and flood defence wall and embankment to the south of Farmer Brown's Public House, Clonskeagh House, 68 Clonskeagh Road, Dublin 6. The proposal includes for lowering of the sluice gates and provision of grade control structures to the Smurfit Weir along the eastern boundary of the site to provide for improved fish passage; and • All associated site development and infrastructural works, including foul and surface water drainage, including attenuation storage, PV panels at roof level, provision of utilities, and lighting. 		
<p>Reference: WEB2775/24</p> <p>Granted: DCC decided to Grant Permission on 23rd June 2025 Final grant 28th July 2025</p>	<p>The proposed amendments seek to alter the permitted development from a Build to Rent apartment scheme to a standard apartment scheme, and comprises of the following:</p> <ul style="list-style-type: none"> • Omission of Condition No's 3, 4 and 5 of the An Bord Pleanála Order under ABP Ref.: 313048-22; • Alterations to 3 no. units at ground floor level to provide private amenity space to each unit on the north elevation, and associated alterations to the north elevation; and • All associated site development works. 	4.21km northwest	<p>In-combination impacts are not foreseen for those reason's taken into consideration in the planner's report:</p> <p>Appropriate Assessment. Having regard to the nature and scale of the proposed development, which involve minimal additions to a permitted development, the availability of public services, the nature of the receiving environment, and the proximity</p>

Planning Application	Development Description	Distance to Proposed Development	Potential for in-combination effects?
	<p>The permitted development (ABP Ref.: 313048-22 and DCC Reg. Ref.: 4115/21) provides 74 no. residential units and there is no proposed change to the total number or mix of units permitted.</p>		<p>of the lands in question to the nearest European site, it is my opinion that no appropriate assessment issues arise and that the proposed development would not be likely to have a significant effect, either individually or in combination with other plans or projects, on any Natura 2000 site.</p>
<p>Reference: 3011/24 (ACP Ref. ABP-320695-24)</p> <p>Granted: DCC decided to Grant Permission on 1st August 2024</p> <p>Decision: Granted Permission by An Coimisiún Pleanála on 23rd July 2025.</p>	<p>The development will consist of: the internal reconfiguration and full renovation of an existing 2 storey science block (c. 830 sq m) and the construction of a new 3 storey extension with a rooftop observatory (c. 1,431 sq m) all accommodating a new Science, Technology, Engineering, Arts, and Mathematics (STEAM) facility, located to the north-east of the college. The extension will connect to the existing 2 storey science building to the south via a double-height atrium and to the existing Sandford Grove House (educational use) to the west via a new glazed walkway at second floor level.</p> <p>The development will also include: the removal of an external fire escape and associated minor works to the eastern facade of Sandford Grove House; works to the hard standing areas to the north and north-west of the college to provide a reconfigured and landscaped car parking area for 13 no. staff parking spaces (incl. 1 no. accessible space and 3 no. electric charging point), bus set-down spaces and bicycle parking; and the provision of a new ESB substation and switch room (c. 25 sq m) located to the west of the college.</p> <p>The development will also comprise: hard and soft landscaping; piped infrastructure and ducting; drainage infrastructure; green roofs; changes in levels and all associated site development and excavation works above and below ground</p>	<p>6.01km west</p>	<p>The ACP inspectors report found that there was no potential for significant impact as a result of the development, alone or in-combination, accounting for the nature and scale of the proposal, and the distance of the proposal to the nearest European Site.</p> <p>Therefore, the potential for in-combination effects to occur are not foreseen, taking the aforementioned points into consideration for this assessment.</p>

5.4.2 Relevant Policies and Plans

The local policies and plans detailed in Section 3.2 were reviewed and considered for possible in-combination effects with the Proposed Development. It is not expected that these plans and policies would result in any likely significant in-combination effects with the Proposed Development. Each of these plans has also undergone AA, and where potential for likely significant effects has been identified (e.g., in the case of the Dublin City Development Plan (DCDP) 2022-2028), an NIS has been prepared which identifies appropriate mitigation. The Dublin City Development Plan (DCDP) 2022-2028 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

On examination of the above it is considered that there are **no means** for the Proposed Development to act in-combination with any policies or plans that would cause any likely significant effects on any European sites.

5.4.3 Operation of Ringsend WWTP

This section addresses in more detail the general issue of potential in-combination effects with Ringsend WwTP arising from the Operational Phase of the Proposed Development and other Developments, including future developments.

In summary, the impact of the Proposed Development and any future development has already been appropriately considered and assessed as part of the application process for the existing planning permissions pertaining to Ringsend WwTP.

The 2012 Ringsend WwTP application for planning permission (Ref. PL.29N.YA0010) was for a PE of 2.4 million and was predicated on the findings of the 2005 GSDS. The GSDS set out the drainage requirements for the Greater Dublin Area (GDA) up to 2031. The GSDS relied on the Regional Planning Guidelines (RPGs) and the National Spatial Strategy (NSS) in order to estimate the future projected population increases for the GDA. The studies indicated a predicted growth in population from 1.2 million in 2002 to just over 2 million in 2031 for the GDA region.

In June 2018 Uisce Éireann (then Irish Water) applied for and subsequently received planning permission in 2019 for upgrade works to the Ringsend WwTP facility. The first phase of upgrade works to Ringsend WWTP was completed in December 2021, which increased the capacity of the plant by 400,000 P.E. Uisce Éireann completed construction of the infrastructure to treat the wastewater for a population equivalent of 2.1 million at the end of 2025. Following a period of testing and commissioning the upgraded assets are operational. These works, together with the continued future works permitted will ultimately increase the capacity of the facility from 1.6 million P.E. to 2.4 million PE by the end of 2025 (Irish Water website: <https://www.water.ie/projects/local-projects/ringsend/>). This plant upgrade will result in an overall reduction in the final effluent discharge of several parameters from the facility including biochemical oxygen demand (BOD), suspended solids, ammonia, dissolved inorganic nitrogen (DIN) and molybdate reactive phosphate (MRP).

Therefore, both the initially permitted 2012 upgrade and the permitted 2019 revised upgrade (Ref. ABP-301798-18) for Ringsend WwTP take account of population growth up to 2.4 million PE. Both applications were subject to EIA, and therefore an EIAR, and accompanied by an AA screening report and NIS. The EIAR contains sections relating to Marine Biodiversity and Terrestrial Biodiversity, and each contains a section on the 'do-nothing scenario'. These review the effects of the WwTP on biodiversity in Dublin Bay in the absence of the upgrade works and so are relevant to this Report.

The EIAR acknowledges that under the do-nothing scenario *"the areas in the Tolka Estuary and North Bull Island channel will continue to be affected by the cumulative nutrient loads from the river Liffey and Tolka and the effluent from the Ringsend WWTP"*, which could result in a decline in biodiversity and the deterioration of the biological status of Dublin Bay (Irish Water, 2018). Nevertheless, these negative impacts of nutrient over-enrichment are considered *"unlikely"* (Irish Water, 2018). This is because historical data suggests that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna. The EIAR notes that *"although a localised decline could occur, it is not envisaged to be to a scale that could pose a threat to the shellfish, fish, bird or marine mammal populations that occur in the area."* Furthermore, the EIAR notes that significant impacts on waterbird populations foraging on invertebrates in Dublin Bay due to nutrient over-enrichment are *"unlikely"* to occur (Irish Water, 2018). What is important in the context of this AA Screening Report is that the do-

nothing scenario predicts that nutrient and suspended solid loads from the WwTP will “*continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity*” and that “*if the status quo is maintained there will be little or no change in the majority of the intertidal faunal assemblages found in Dublin Bay which would likely continue to be relatively diverse and rich across the bay.*”

Therefore, it can be concluded that likely significant effects on marine biodiversity and the European sites within Dublin Bay from the *current* operation of Ringsend WwTP are unlikely. Importantly, this conclusion is not dependent upon any future works to be undertaken at Ringsend. Thus, in the absence of any upgrading works, significant in-combination effects on European sites in this regard **are not deemed likely to arise**, and therefore likely significant effects involving foul waters produced by the Proposed Development also do not have the potential to occur.

TABLE 3. SUMMARY OF SCREENING FOR LIKELY SIGNIFICANT EFFECTS ON EUROPEAN SITES THAT MAINTAIN A S-P-R PATHWAY TO THE PROPOSED DEVELOPMENT .

Site	Habitat Loss / Alteration	Habitat Species or Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC's							
South Dublin Bay SAC (000210)	No	No	No	No	No	No	No
North Dublin Bay SAC (000206)	No	No	No	No	No	No	No
Rockabill to Dalkey Island SAC (003000)	No	No	No	No	No	No	No
SPA's							
North Bull Island SPA (004006)	No	No	No	No	No	No	No
South Dublin Bay and River Tolka Estuary SPA (004024)	No	No	No	No	No	No	No
North-west Irish Sea Marine SPA (004232)	No	No	No	No	No	No	No

6 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at Lands at Milltown Park, Sandford Road, Dublin 6, D06 V9K7 has been assessed taking into account:

- The nature, size and location of the Proposed Development and possible impacts arising from the Construction and/or Operational Phase.
- The qualifying interests and conservation objectives of the European sites.
- The potential for in-combination effects arising from other plans and projects.

In conclusion, upon the examination, analysis and evaluation of the relevant information, and applying the precautionary principle, it is concluded by the authors of this Report that, on the basis of objective information, **the possibility may be excluded** that the Proposed Development will have a likely significant effect on any of the European sites identified in this AA Screening as maintaining a S-P-R pathway with the Proposed Development. These Sites are listed below:

- **South Dublin Bay SAC (000210).**
- **North Dublin Bay SAC (000206).**
- **Rockabill to Dalkey Island SAC (003000).**
- **South Dublin Bay and River Tolka Estuary SPA (004024).**
- **North Bull Island SPA (004006)**
- **Wicklow Mountains SAC (002122)**

In carrying out this AA screening, specific targeted mitigation measures included for the primary reason of protecting a European site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the likelihood of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the AA process; and the preparation of a NIS is not required.

7 REFERENCES

AWN Consulting (2025). Hydrological & Hydrogeological Qualitative Risk Assessment for Proposed Residential Development Site at Sandford Road, Dublin 6.

Bird Survey & Assessment Steering Group. (2022). Bird Survey Guidelines for assessing ecological impacts, v.1.0.0. <https://birdsurveyguidelines.org>

CIEEM (2024). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.3. Chartered Institute of Ecology and Environmental Management, Winchester.

Cutts, N. Phelps, A. & Burdon, D. (2009) Construction and Waterfowl: Defining Sensitivity, Response, Impacts and Guidance, and Wright, M., Goodman, P & Cameron, T. (2010) Exploring Behavioural Responses of Shorebirds to Impulsive Noise. *Wildfowl* (2010) 60: 150–167.

DBFL. (2025a). Preliminary Construction Management Plan. DBFL Consulting Engineers.

DBFL. (2025b). Infrastructure Design Report. DBFL Consulting Engineers.

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

Department of the Environment, Heritage and Local Government. (2021). Circular Letter: EUIPR 01/2021. Amendments to section 42 of the Planning and Development Act 2000, as amended and associated Planning and Development Regulations 2001.

DHLGH. (2025a). Department of Housing, Local Government and Heritage. National Planning Application Database. Available at: <https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de> [Accessed November 2025.]

DHLGH. (2025b). Department of Housing, Local Government and Heritage EIAR Planning Portal. Available at: <https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>. [Accessed November 2025.]

Dublin City Council (2025). Dublin City Development Plan 2022-2028. [ONLINE] Available at: <https://www.dublincity.ie/residential/planning/strategic-planning/dublin-city-development-plan/development-plan-2022-2028> [Accessed June 2025].

EEA (2025). European Environmental Agency. Natura 2000 [Online Map] Viewer. Available at: <https://natura2000.eea.europa.eu/>

EirGrid (2012a). Environmental Report for the Grid25 Implementation Programme 2011-2016. Grid25 SEA Report. Available [Online] at [Environmental-Report-for-the-Grid25-Implementation-Programme-2011-2016-Strategic-Environmental-Assessment.pdf](#).

EirGrid (2012b). Transmission Development Plan Environmental Appraisal Report 2012-2022. <https://cms.eirgrid.ie/sites/default/files/publications/TDP2012-2022FINAL.pdf>.

EirGrid (2016). EirGrid Evidence Based Environmental Studies, Study 5: Birds. Literature review and evidence based field study on the effects of high voltage transmission lines on birds. Available [PDF] online at [EirGrid-Evidence-Based-Environmental-Study-5-Birds.pdf](#). Produced May 2016.

Enviroguide Consulting. (2022). Natura Impact Statement for Proposed Mixed-use Development at lands east of St Paul's College, Sybil Hill Road, Raheny, Dublin 5. Prepared for Raheny 3 Limited Partnership.

Environmental Protection Agency. (2025). Environmental Protection Agency Online Mapping [ONLINE] Available at: <http://www.epa.ie/> [Accessed June 2025].

European Commission. (2000). Managing European Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Communities, Luxembourg.

European Commission. (2019). Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1555085968125&uri=CELEX:52019XC0125\(07\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1555085968125&uri=CELEX:52019XC0125(07)).

European Commission. (2021). Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC Brussels, 28.9.2021

European Commission. (2021). Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC Brussels, 28.9.2021

Fossitt, J. (2000). *A Guide to Habitats in Ireland*. The Heritage Council, Kilkenny.

Franklin, A. N. (2002). What is Habitat Fragmentation? *Studies in Avian Biology*, 20-29.

Furness, R.W. (2019). Avoidance rates of herring gull, great black-backed gull and common gull for use in the assessment of terrestrial wind farms in Scotland. Scottish Natural Heritage Research Report No. 1019.

Geological Survey Ireland. (2025). Geological Survey of Ireland website [ONLINE] Available at: <http://www.gsi.ie/> accessed [Accessed June 2025].

Gilbert, G., Stanbury, A., and Lewis, L. (2021). Birds of Conservation Concern 2020-2026.

Holman, C., Plant, G., & Ashmore, M. (2014). Guidance on the assessment of dust from demolition and construction. Institute of Air Quality Management (IAQM).

IAQM (2016). Guidance on the Assessment of Mineral Dust Impacts for Planning. Institute of Air Quality Management, London.

Irish Water (2018) Ringsend Wastewater Treatment Plant Upgrade Project Environmental Impact Assessment Report. Volume 3 - Ringsend Wastewater Treatment Plant Part A: Report

JBA Consulting (2021). Milltown Park, Sandford Road , Dublin 6. Screening for Appropriate Assessment (Final) 02/09/2021 V14.0

Jenkins, A.R., Smallie, J.J. and Diamond, M., (2010). Avian collisions with power lines: a global review of causes and mitigation with a South African perspective. *Bird Conservation International*, 20(3), pp.263-278.

Marnell, F., O'Neill, L. and Lynn, D. (2011) 'How to calculate range and population size for the otter? The Irish approach as a case study', IUCN/SSC Otter Specialist Group Bulletin, 28B, pp. 15–22. Available at: https://www.iucnosgbull.org/Volume28B/Marnell_et_al_2011.pdf (Accessed: 20 November 2025).

NPWS (2013a) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2013b) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2013c) Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2015a) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht



NPWS (2015b) 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.

NPWS (2017). Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

NPWS (2025) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

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

Office of the Planning Regulator (2021). Appropriate Assessment Screening for Development Management, OPR Practice Note PN01.

Scottish Natural Heritage (2018). Avoidance Rates for the onshore SNH Wind Farm Collision Risk Model. September 2018 v2.

Vincent Wildlife Trust (n.d.) Otter Species. Vincent Wildlife Trust Ireland. Available at: <https://www.vincentwildlife.ie/species/otter> (Accessed: 20 November 2025).



8 APPENDICES

8.1 Appendix 1



FIGURE 5: PHOTOGRAPH FROM THE SALES BROCHURE OF THE SANDFORD ROAD SITE SHOWING THE UNMANAGED GRASSLAND WITH TALL GRASS, TAKEN IN 2019. (SOURCE: SANDFORD ROAD SALES BROCHURE, GVA DONAL O BUACHALLA)



FIGURE 6: PHOTOGRAPH TAKEN DURING A SITE VISIT OF THE SANDFORD ROAD SITE SHOWING THE UNMANAGED GRASSLAND WITH TALL GRASS, TAKEN IN 2025. (SOURCE: DNV, 2025)







About DNV

DNV is the independent expert in risk management and assurance, operating in more than 100 countries. Through its broad experience and deep expertise DNV advances safety and sustainable performance, sets industry benchmarks, and inspires and invents solutions.

Whether assessing a new ship design, optimizing the performance of a wind farm, analyzing sensor data from a gas pipeline or certifying a food company's supply chain, DNV enables its customers and their stakeholders to make critical decisions with confidence.

Driven by its purpose, to safeguard life, property, and the environment, DNV helps tackle the challenges and global transformations facing its customers and the world today and is a trusted voice for many of the world's most successful and forward-thinking companies.