

# REPORT TO INFORM APPROPRIATE ASSESSMENT SCREENING FOR PROPOSED ENERGY WORKS AT THE CLONDALKIN CIVIC CENTRE, NINTH LOCK ROAD, CLONDALKIN, DUBLIN 22

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## Report to Inform AA Screening

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**Prepared for:**

South Dublin County Council



Comhairle Contae South Dublin  
Átha Cliath Theas County Council

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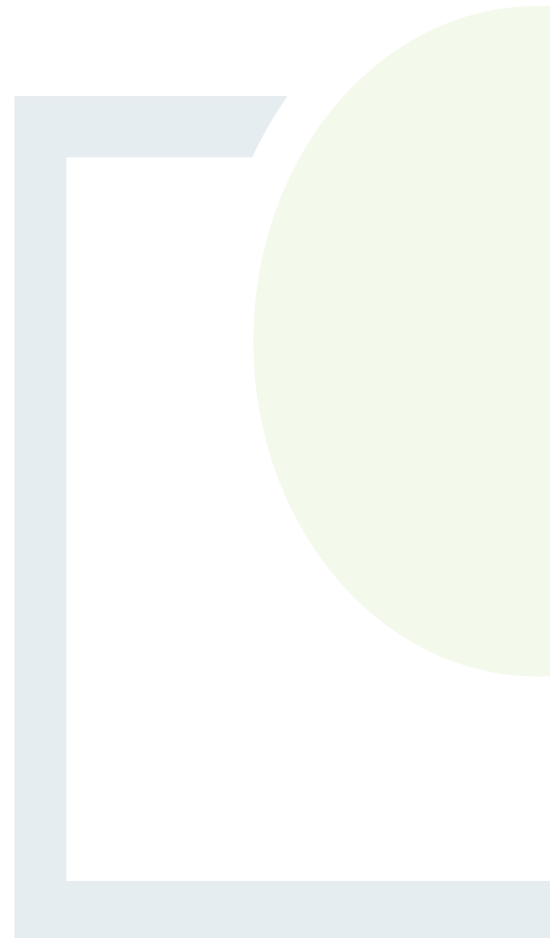
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## Report to Inform Appropriate Assessment Screening for Proposed Energy Works at Clondalkin Civic Centre, Ninth Lock Road, Clondalkin, Dublin 22

### REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

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**Abstract:** Fehily Timoney and Company is pleased to submit this Report to Inform Appropriate Assessment Screening to South Dublin County Council for the proposed energy works at Clondalkin Civic Centre, Clondalkin, County Dublin, D22 XP86.

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## 1. INTRODUCTION

Fehily Timoney and Company (FT) have been commissioned by South Dublin County Council (SDCC) to prepare this Report to Inform Appropriate Assessment Screening, for undertaking energy works aimed at decarbonising and improving energy efficiency at the Clondalkin Civic Centre, Ninth Lock Rd, Clondalkin, Dublin 22, D22 E9X5 (referred to as the 'proposed development' in this report).

This report presents an examination of whether the proposed works are likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is based on best available scientific knowledge. This report has been prepared to inform the competent authority in completing their statutory obligations in relation to Appropriate Assessment, as required by Article 6(3) under Council Directive 92/43/EEC (Habitats Directive)<sup>1</sup>.

### 1.1 Legislative Context

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive)<sup>2</sup> provides legal protection for habitats and species of European importance. The Directive requires that where a plan or project is likely to have a significant effect on a European Site, while not directly connected with or necessary to the nature conservation management of the site, it will be subject to 'Appropriate Assessment' to identify any implications for the European site in view of the site's Conservation Objectives. Specifically, Article 6(3) of the Habitats Directive states:

*"6(3) Any plan or project not directly connected with or necessary to the management of the site (Natura 2000 sites) but likely to have significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."*

The competent authority must carry out a screening for appropriate assessment to assess, in view of best scientific knowledge, if the proposed project, individually or in combination with another plan or project is likely to have a significant effect on a European site. If it cannot be excluded, on the basis of objective information, that the proposed project, individually or in combination with other plans or projects, will have a significant effect on a European site, an appropriate assessment of its implications for the European Site(s) in view of the Site's conservation objectives is required to be carried out.

The provisions of Article 6(3) do not apply where the proposed plan or project is 'connected with or necessary to the management of the site'. In this case, the proposed project is not directly connected with or necessary to the management of any European site(s).

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<sup>1</sup> European Commission. (2021). Commission notice- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (Issue 2021/C 437/01).

<sup>2</sup> European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive).



## 1.2 Methodology

The purpose of appropriate assessment is to assess the implications of a plan or project on European site in view of that site's conservation objectives, individually and in combination with other plans or projects.

The assessment was conducted in accordance with the following guidance:

- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin (2009, updated 2010) (Environment Heritage and Local Government, 2009)<sup>3</sup>.
- Interpretation Manual of European Union Habitats. Version EUR 28. (European Commission, 2013)<sup>4</sup>.
- Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC. European Commission (2019). Brussels, (2019/C 33/01). OJ C 33, 25.1.2019<sup>5</sup>.
- OPR Practice Note PN01 Appropriate Assessment Screening for Development Management, (Office of the Planning Regulator, 2021)<sup>6</sup>.
- 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. Commission Notice (2021) Brussels, 28.9.2021 C(2021) 6913 final (European Commission, 2021)<sup>7</sup>.

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<sup>3</sup> Environment Heritage and Local Government. (2009). Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities.

<sup>4</sup> European Commission. (2013). Interpretation Manual of European Union Habitats. EUR 28.

<sup>5</sup> European Commission. (2019). Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC.

<sup>6</sup> Office of the Planning Regulator. (2021). OPR Practice Note PN01. Appropriate Assessment Screening for Development Management.

<sup>7</sup> European Commission. (2021). Commission notice- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (Issue 2021/C 437/01).



### 1.3 Relevant Experience and Expertise of Assessor and Reviewer

Conor Murphy of FT prepared the report. Conor is a Project Ecologist working in the Circular Economy and Environment Team in FT. Conor has four years' postgraduate experience and holds a BSc. (Hons) in Zoology from University of Galway (formerly National University of Ireland, Galway) and a MSc. in Wildlife Conservation and Management (1st Class Hons) from University College Dublin. Conor has in-depth knowledge of environmental policy, legislation and assessment procedures. Conor has an in-depth knowledge of the AA process and understanding of the legislation governing AA practice in Ireland and the EU.

Richard Deeney of FT was responsible for reviewing the assessment and report. Richard is a Principal Environmental Scientist working as part of the Circular Economy and Environment Team at FT. Richard holds a B.Sc. First Class Honours degree in Environmental Management from Technological University Dublin (formerly Dublin Institute of Technology) and an Advanced Diploma in Planning and Environmental Law with the Honorable Society of King's Inns. Richard is a Chartered Environmentalist with the Society for the Environment and has 14 years' experience.

Bernie Guinan was responsible for reviewing and approving the report. Bernie is Director with FT and is a Chartered Waste Manager. She has 25 years' experience in delivering and managing projects and infrastructure delivery for a wide variety of sectors. Bernie has extensive experience in all aspects of strategic management planning and infrastructure development in Ireland, the UK, KSA and UAE. She is an experienced planning policy analyst and strategic planner. She has in-depth knowledge of all environmental and planning policy, legislation and guidance. She has been providing environmental, planning and waste management consultancy services to public bodies for over 25 years. She has a vast amount of experience coordinating EIA, SEA and AA projects, including national, large-scale and complex projects.



## 2. DESCRIPTION OF THE PROJECT

### 2.1 Overview of the Proposed Development

The proposed project is part of a wider proposal to decarbonise SDCC's buildings with the largest energy consumption and greenhouse emissions. The Baseline Emissions profile published in SDCC's Local Authority Climate Action Plan (LACAP) 2024-2029 identified six buildings in SDCC ownership that had the highest emissions reductions potential. The Clondalkin Civic Centre was one of the six identified buildings.

The proposed works comprise:

- Installation of a heat pump system in the car park area of the building, with associated site works.
- The heat pumps will be housed in an acoustic enclosure that is 2 m in width, 3.04 m in length and 3.225 m in height
- The heat pump system will be installed on a concrete base and surrounded by a 2.4 m high mesh fence, with one access gate. This compound will be 5.24 m by 4.95 m.

The proposed development will be followed by the delivery of a further project, which includes the installation of rooftop solar photovoltaic panels. The array to be installed in less than 300 m<sup>2</sup> and therefore is considered to be exempt development in line with Planning and Development Act 2000 (Exempted Development) (No. 3) Regulations 2022 and the Solar Safeguarding Zone Regulations 2022 (S.I. No. 492/2022 - Planning And Development (Solar Safeguarding Zone) Regulations 2022).

### 2.2 Construction Phase of the Proposed Development

#### 2.2.1 Overview of Proposed Construction Works

The proposed works comprise the installation of two air source heat pumps (ASHPs) in the carpark adjacent to the Civic Centre building in a compound area. The proposed compound will be 5.24 m by 4.95 m and will comprise of a concrete slab. The area will be enclosed by a 2.4 m high mesh fence, with a single access gate. The heat pumps will be housed in an acoustic enclosure that is 2 m in width, 3.04 m in length and 3.225 m in height.

The proposed heating system will provide space heating and hot water. Works include the installation of the external heat pump units, electrical and mechanical connections, and internal pipework and control systems. The two external pumps to be installed will be of the following specifications:

- Manufacturer: Rhoss
- Model: POKER-P
- Length: 1224 mm
- Height: 2335 mm
- Depth: 1320 mm

Tarmac and hardstanding along the proposed location of the heat pumps will be removed and a concrete plinth will be installed for supporting the heat pumps.



Trenching for cabling will be carried out within existing brownfield site. Excavation of existing material will be undertaken and backfill will be done with clean stone, sand, existing material. Tarmac resurfacing will then be carried out. Proposed duct depth will range between 1000 - 2000 mm.

Services to be installed are as follows:

- Pre-insulated PE-X pipework c/w cross bonded polyurethane foam insulation (District Heating grade)
- Electrical cabling within PVC ducting

The estimated area of solar PV arrays to be installed as the adjacent project will be 200 m<sup>2</sup>.

### 2.2.2 Construction Programme

Construction works will be carried out between September to December 2026, with some potential works continuing into early 2027.

Hours of construction will be restricted to the times defined in the SDCC CDP:

- 07:00-19:00 on Monday to Friday
- 09:00-13:00 on Saturdays

No work will be undertaken on Sundays, bank holidays and public holidays. Approximately 1 to 10 no. construction workers will be employed for carrying out the works.

### 2.2.3 Environmental Management during Construction

The selected contractor (Alternative Heat Ltd.) has carried out a site-specific risk assessment applicable to the proposed development site and has prepared a suite of mitigation measures for identified risks. This has been included in the Health and Safety Plan prepared by the contractor, and a summary of the risk assessment and mitigation measures can be found in the Part 8 Planning Report for the proposed development.

These measures will mitigate the following identified risks:

- Public safety risks from high pedestrian activity near council services, car parks, shops, public transport links and nearby facilities
- Traffic disruption and congestion affecting roads, car parks, staff, visitors and service users
- Restricted access to Civic Centre and disruption to civic services.
- Noise and vibration affecting nearby residential areas, schools, offices, businesses and Civic Centre operations.
- Dust and air quality issues
- Emergency access restrictions for the Civic Centre and surrounding facilities
- Construction waste and debris causing pedestrian hazards, environmental damage or visual pollution
- Weather-related delays and hazards such as slippery surfaces, flooding or unsafe materials during windy conditions
- Reputational and community impact from poor communication or mismanagement of disruption





- Security and emergency preparedness risks due to high daily footfall and continuous public activity
- Security and emergency preparedness risks due to high daily footfall and continuous public activity

Standard construction phase mitigation measures will apply for the proposed development to prevent effects on receiving surface water bodies, such as:

- All rubble arising due to breaking of ground will be collected and safely contained in skips/storage containers before immediate dispatch off-site. Breaking of ground will occur in dry conditions.
- To mitigate against erosion of exposed soils, all excavations will be backfilled as quickly as possible. Excavations will stop during or prior to heavy rainfall events. All excavations will be carried out such that they are stable or adequately supported. Where appropriate and necessary, excavations will be protected against the ingress of water or erosion by using cut-off trenches to minimise the flow of surface water through construction areas. Excavations will be designed in a manner that maximises the percolation of surface water to ground and prevents run-off of surface water to the stream to the south of the site.
- Good housekeeping will be practiced on-site to prevent discharge of polluting material to the surface water environment (I.e. post work clean down, end of day clean down, visual inspection and maintenance of the site drainage system elements).
- Spill kits containing oil soakage pads and booms will be made available on-site to ensure prompt and adequate clean-up of any accidental fuel or oil spills.
- An Emergency/Spill Response Procedure will be prepared, and all construction site operatives will be briefed on the response measures required during the site inductions and routine toolbox talks.

**Note:** No environmental mitigation measures have been considered when examining whether the proposed works are likely to have a significant effect on a European site (either alone or in combination with other plans or projects)

## 2.3 Operational Phase of the Proposed Development

The proposed development, once operational, will act as a low-carbon, sustainable heating system for the building. Scheduled servicing and maintenance may be carried out on the heat pumps as required by the appointed contractor.

The operational phase of the proposed development is projected to bring down the building's energy annual energy consumption to 149,041 kWh per year. This will result in 53% savings. The building will also consequently reduce greenhouse gas emissions to 37,355 kgCO<sub>2</sub>e, resulting in 48% reduction on current levels.

## 2.4 Existing Environment

The proposed development will be sited within the carpark and rooftop area of the Clondalkin Civic Centre. It will be contained within the red line boundary area of 8,764 m<sup>2</sup> (0.8764 hectares).

The Clondalkin Civic Centre houses a Council Chamber and councilors' offices, law centre offices, the Childcare Committee offices, a crèche and a Money Advice and Budgeting Services (MABS) office. The building was constructed in 1999, with a useful floor area of 2,010 m<sup>2</sup>.



The building is currently heated by gas boilers. The existing building currently consumes 315,335 kWh annually. Annual greenhouse gas emissions from the current building operations are 72,072 CO<sub>2</sub>e.

#### 2.4.1 Description of Existing Ecological Baseline

##### 2.4.1.1 *Desktop Assessment*

In July 2026, a desk study was carried out to collate available information on the existing natural environment at the location of the proposed development. This comprised a review of the following publications, data and datasets:

- Environmental Protection Agency (EPA) (on-line map-viewer including the Appropriate Assessment Tool);
- Aerial imagery of the proposed development and surrounding lands
- Tailte Éireann National Land Cover Map
- OSI Aerial photography and 1:50000 mapping
- Geological Survey Ireland (GSI) maps and data
- Department of Housing, Planning, and Local Government- EIA Portal;
- National Parks and Wildlife Service – online European site network information, including site conservation objectives;
- National Parks and Wildlife Service – Information on the status of EU protected habitats and species in Ireland (including Article 17 and Article 12 Reports);
- National Biodiversity Data Centre (NBDC) Biodiversity Maps viewer (Accessed July 2026); and
- National Land Cover (2018) dataset (Accessed July 2026).

The area surrounding the proposed development location is urban in nature, comprising various commercial and residential properties. The Clondalkin Civic Centre building is bounded to the east by the Clondalkin Civic Centre car park. The Mill Shopping Centre is located to the west. Residential properties on Orchard Land and Thornfield Square are to the east and south-east.

The building is located within Casement Aerodrome Solar Safeguarding Zone.

The Ninth Lock Road (L1026) is located on the west of the site, which intersects with the New Nangor Road (R134). The R314 connects to the N7 to the south. The Clondalkin to the Grand Canal Cycleway (Cycle South Dublin) borders the south of the site.

The proposed development site is located within zoning classification 'TC' - *'To protect, improve and provide for the future development of Town Centres'* under the SDCC County Development Plan 2022-2028 (CDP).

The Clondalkin Civic Centre is underlain by Dublin ground water body. The groundwater status is 'Good'. The building is underlain by a Locally Important Aquifer, described as 'Bedrock'. Soils underlying the site is classified as Elton, described as 'Luvisol: Well drained mineral soils' and Urban described as 'Urban - soil concreted cover', and are underlain by Made subsoils.



The proposed development site is underlain by a Locally Important Aquifer (*'Bedrock which is Moderately Productive only in Local Zones'*). Groundwater vulnerability is classified as *'Extremely Vulnerable'*, indicating that groundwater at the site has natural characteristics that makes it extremely vulnerable to contamination by human activities.

The proposed development is located within the Water Framework Directive (WFD) Catchment Liffey and Dublin Bay (Catchment ID: 09), the Liffey\_SC\_090 Sub-catchment (Sub-catchment ID: 09\_15) and the CAMAC\_030 River Sub-Basin (Sub Basin ID: IE\_EA\_09C020310). The closest waterbody within the same sub-basin is the Camac River (EPA Code: 09C02, Order: 4<sup>th</sup>), which flows along the southern boundary of the Civic Centre building. The Camac River flows in a north-easterly direction before discharging into the Liffey Estuary Upper (ID: IE\_EA\_090\_0400) approximately 8.8 km north-east of the site. The receiving Camac River is of *'Poor'* biological status (WFD Status 2019-2024) and is at risk of failing to meet *'Good'* status.

As per CORINE land use (2018), the development site is classified as *'Artificial Surfaces'* (121).

According to the National Land Cover mapping, the proposed development comprises Buildings (110), Amenity Grassland (520), Rivers and Streams (810) and Other Artificial Surfaces (130). Examination of the orthophotography indicates the presence of a Treeline (470) located along the southern boundary of the proposed development and rules out the presence of Amenity Grassland.

Examination of the Catchment Flood Risk Assessment (CFRAM) flood maps for the area indicate that the development site is not at high risk of fluvial flooding.

There were no NBDC records of alien invasive species documented within the proposed development site. Examination of the orthophotography indicated the presence of Butterfly-bush (*Buddleja davidii*) at the south-eastern corner of the proposed development.



### 3. SCREENING FOR APPROPRIATE ASSESSMENT

#### 3.1 Introduction

This section of the report examines whether the proposed works are likely to have a significant effect upon European Sites, either alone or in combination with other plans or projects.

#### 3.2 Identification of European Sites within the Zone of Influence of the Proposed Development

The process of determining the likelihood of significant effects from a Proposed Development on European sites is an iterative process centred around a Source-Pathway-Receptor (S-P-R) model as per OPR, 2021<sup>8</sup>. For an effect to be established, all three elements of this mechanism must be in place. The absence of one of the elements of the mechanism is sufficient to conclude that a potential effect cannot occur.

- Source(s) – e.g. pollutant run-off, noise, removal of vegetation, etc.;
- Pathway(s) – functional link, or ecological pathway e.g. watercourse flowing into a downstream SAC; and
- Receptor(s) – the qualifying habitats and species of European sites and ecological resources supporting those habitats/species.

In the context of this report, a source is any identifiable element of the Proposed Development that is known to interact with the receiving environment. A receptor is the Qualifying Interests (QI)<sup>9</sup> for an SAC/cSAC or Special Conservation Interests (SCI)<sup>10</sup> for an SPA/cSPA or an ecological feature that is known to be utilised by the QI/SCI. In practice, the term QI also applies to SCIs (and is used in this document for simplicity). A pathway is any connection or link between the source and the receptor.

The European Commission Notice (2021) on the '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', states that in identifying European sites (Natural 2000 sites), which may be affected by the project, the following should be identified:

- Any European sites geographically overlapping with any of the actions or aspects of the proposed development in any of its phases, or adjacent to them;

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<sup>8</sup> Office of the Planning Regulator. (2021). OPR Practice Note PN01 Appropriate Assessment Screening for Development Management

<sup>9</sup> SACs are areas designated under the Habitats Directive to conserve habitats listed in Annex I of the Directive and plant and animal species listed in Annex II. Collectively these are referred to as the 'Qualifying Interests' or 'QIs' of the SAC / cSAC.

<sup>10</sup> SPAs are sites classified under the Birds Directive to protect rare or vulnerable bird species listed in Annex I to the Directive as well as regularly occurring migratory species and wetlands. Wetland habitats that support internationally important populations of migratory birds may be coastal or inland. Collectively, these species and habitats are referred to as the 'Special Conservation Interests' of the SPA / cSPA.



- Any European sites within the likely zone of influence (Zoi) of the proposed development. European sites located in the surroundings of the proposed development (or at some distance) that could still be indirectly affected by aspects of the proposed development, including as regards the use of natural resources (e.g., water) and various types of waste, discharge or emissions of substances or energy;
- European sites whose connectivity or ecological continuity can be affected by the proposed development.

There are no European sites geographically overlapping with the proposed development. As such, further consideration is given to the 'likely zone of influence' and 'connectivity or ecological continuity'.

### 3.3 Zone of Influence

As per CIEEM guidelines (2018)<sup>11</sup>, the Zoi for a proposed development is defined having regard to the spatial and temporal scale of potential biophysical changes in the environment which might occur because of the development and throughout its lifetime. In considering such potential biophysical changes, the following was considered:

- Impacts on habitats - the potential for biophysical change by disturbance/damage/ degradation is taken as the footprint of the works (including site clearance) plus 10 m beyond (based on Ryan Hanley, 2014)<sup>12</sup>. There are no European sites located within 10 m of the Proposed Development.
- For groundwater dependant terrestrial ecosystems (GWDTE), regard is had to SEPA guidelines<sup>13</sup> which prescribes a potential hydrogeological effect zone of 250 m from ground works. There are no European sites located 250 m of the Proposed Development.
- The NRA (2006) Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes<sup>14</sup> notes a 150 m potential disturbance Zoi for otter for breeding holts and 20 m for non-breeding active holts. As such the study area included the proposed development site plus a 150 m buffer to assess habitat suitability for otter and potential association with an SAC population. The proposed development is not located within 150 m from an SAC. Furthermore, there is no connections between the proposed development and any surface waterbody, therefore indirect connections can be ruled out.
- The potential disturbance Zoi for birds beyond the footprint of the proposed development was considered having regard to Cutts et al (2013)<sup>15</sup> and was defined as 500 m. Consideration of connectivity or ecological continuity for birds is set out in 3.3.1.

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<sup>11</sup> CIEEM (2018) 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

<sup>12</sup> Ryan Hanley (2014b) Stage 1: Appropriate Assessment Screening Methodology for the Maintenance of Arterial Drainage Schemes. Prepared by Ryan Hanley Consulting Engineers on behalf of the Office of Public Works

<sup>13</sup> Scottish Environment Protection Agency (2014) Land Use Planning System SEPA Guidance Note 31. Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and groundwater Dependent Terrestrial Ecosystems.

<sup>14</sup> NRA, 2006. Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes. Dublin: National Roads Authority. Available at: <http://www.nra.ie/Environment/>

<sup>15</sup> Cutts N, Hemingway K and Spencer J (2013). The Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Projects. Produced by the Institute of Estuarine and Coastal Studies (IECS). Version 3.2.



### 3.3.1 Connectivity or Ecological Continuity

Connectivity or ecological continuity refers to the degree to which different parts of a landscape, ecosystem, or habitat are physically or functionally linked, allowing the movement of organisms, nutrients, energy, or ecological processes across space. Consideration is therefore given to whether there could be landscape<sup>16</sup> or ecological connectivity<sup>17</sup> to any QI or SCI species. In considering connectivity or ecological continuity the following is noted:

- None of the terrestrial habitats that will be lost, damaged or degraded as a result of the proposed development are integral to the maintenance of the structure or function of any other habitats within any European sites and do not form continuity with any such habitats.
- The Institute of Air Quality Management (Holman et al, 2024)<sup>18</sup> states that for sensitive ecological receptors, sensitivity to dust is 'High' up to 20 m from the source and reduces to 'Medium' over 50 m from the source. The guidelines also stipulate that dust deposition from construction typically occurs up to 500 m from large sites, 200 m from medium sites and 50 m from small sites. A 50 m Zol for dust is adopted given the small scale of the proposed development. There are no European sites located within the Zol of dust deposition and there are no surface waterbodies located within the Zol for dust deposition. S-P-R connectivity is ruled out.
- For potential for impacts on surface waters, regard is had to IFI (2020) guidelines<sup>19</sup> which states that "The recommended [riparian] buffer zone width for larger river channels (>10 m) is 35 m to 60 m and for smaller channels (<10 m) is 20 m or greater". The Camac River is located outside the southern boundary of Clondalkin Civic Centre building and therefore lies within the Zol. The Camac River is hydrologically connected to the South Dublin Bay SAC (IE0000210) with an instream distance of c. 16.6 km.
- In terms of birds there are no SPAs within the 500 m potential disturbance Zol for birds. There is also no S-P-R connectivity for significant effects on the supporting/wetland habitat of SPAs. In order to assess potential connectivity between the proposed development and mobile SCIs, regard was had to the SNH guidelines for the core foraging ranges of SPA birds, and a 15 km range was adopted for consideration. That is, an assessment was made as to whether the habitats within the Zol of the proposed development could act as foraging or roosting habitat for any avian SCIs of SPAs which are located within 15 km of the proposed development, having regard to the conservation objective backing documents for each SPA. The following SPAs are located within 15 km of the proposed development: Wicklow Mountains SPA (IE0004040) (c. 11.5 km), South Dublin Bay and River Tolka Estuary SPA (IE0004024) (c. 11.7 km) and North Bull Island SPA (IE0004006) (c. 14.7 km).
  - Wicklow Mountains SPA (IE0004040): This SPA is located c. 11.5 km from the proposed development. The birds associated with this SPA, Peregrine and Merlin, have relatively small core foraging ranges of 2 km and 5 km respectively (SNH, 2016<sup>20</sup>), as such, the project is located outside of the core foraging range of Peregrine and Merlin. Therefore, there is no S-P-R connectivity for significant effects on Wicklow Mountains SPA and listed SCIs.

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<sup>16</sup> Landscape connectivity is a combined product of structural and functional connectivity, i.e. the effect of physical landscape structure and the actual species use of the landscape.

<sup>17</sup> Connectivity is defined as a measure of the functional availability of the habitats needed for a particular species to move through a given area. Examples include the flight lines used by bats to travel between roosts and foraging areas or the corridors of appropriate habitat needed by some slow colonising species if they are to spread.

<sup>18</sup> Holman et al (2024). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.

<sup>19</sup> Inland Fisheries Ireland (2020) A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning.

<sup>20</sup> Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



- South Dublin Bay and River Tolka Estuary SPA (IE0004024): This SPA is located c. 11.7 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exceptions of Tern species, Black-headed Gull and Light-bellied Brent Goose. Foraging ranges for Arctic tern, Common tern and Roseate tern lie between 23.2 km - 40.5 km (Nature Scot, 2023<sup>21</sup>), approximately 18.5 km for Black-headed Gull (Nature Scot, 2023<sup>21</sup>) and ca. 15 km is assumed based on the data provided in (SNH, 2016<sup>22</sup>). The project and 500 m disturbance distance does not provide suitable habitat for Tern species and provides sub-optimal foraging habitat for these species. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.
- South Dublin Bay SAC (IE0000210): This SAC is located c. 12.1 km (direct distance) from the proposed development. The Camac River is located outside the southern boundary of Clondalkin Civic Centre and is hydrologically connected to the South Dublin Bay SAC (IE0000210) with an instream distance of c. 16.6 km. This SAC is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.
- North Bull Island SPA (IE0004006): This SPA is located c. 14.7 km from the proposed development. The proposed development is located outside of the core foraging range of all avian SCIs with the exceptions of Black-headed Gull and Light-bellied Brent Goose. Foraging ranges for Black-headed Gull is approximately 18.5 km for Black-headed Gull (Nature Scot, 2023<sup>21</sup>) and ca. 15 km is assumed for Light-bellied Brent Goose based on the data provided in (SNH, 2016<sup>23</sup>). The project and 500 m disturbance distance and provides sub-optimal foraging habitat for these species. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.

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<sup>21</sup> Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency

<sup>22</sup> Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)

<sup>23</sup> Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)





**Table 3-1: Identification of European Sites within the Zone of Influence of the proposed project**

| Site Code | Site Name                                    | Distance (km) | Qualifying Features (qualifying interests & special conservation interests)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Potential Effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Pathway for Significant Effects |
|-----------|----------------------------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| (004024)  | South Dublin Bay and River Tolka Estuary SPA | 11.7          | Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> ) [A046]<br>Oystercatcher ( <i>Haematopus ostralegus</i> ) [A130]<br>Ringed Plover ( <i>Charadrius hiaticula</i> ) [A137]<br>Grey Plover ( <i>Pluvialis squatarola</i> ) [A141]<br>Knot ( <i>Calidris canutus</i> ) [A143]<br>Sanderling ( <i>Calidris alba</i> ) [A144]<br>Dunlin ( <i>Calidris alpina</i> ) [A149]<br>Bar-tailed Godwit ( <i>Limosa lapponica</i> ) [A157]<br>Redshank ( <i>Tringa totanus</i> ) [A162]<br>Black-headed Gull ( <i>Chroicocephalus ridibundus</i> ) [A179]<br>Roseate Tern ( <i>Sterna dougallii</i> ) [A192]<br>Common Tern ( <i>Sterna hirundo</i> ) [A193]<br>Arctic Tern ( <i>Sterna paradisaea</i> ) [A194]<br>Wetland and Waterbirds [A999] | <p>The SPA is located outside of the Zol of the proposed development and as such there is no potential for direct impacts on the SPA. However, consideration is given to potential for landscape/ecological connectivity.</p> <p>This SPA is located c. 11.7 km from the proposed development.</p> <p>The proposed development is located outside of the core foraging range of all avian SCIs with the exception of Tern species, Black-headed Gull and Light-bellied Brent Goose.</p> <p>Foraging ranges for Arctic tern, Common tern and Roseate tern lie between 23.2-40.5 km (Nature Scot, 2023<sup>24</sup>). Due to the nature of works (installation of rooftop solar PV array and heat pump system), the proposed development and areas within the 500 m disturbance distance do not provide suitable habitat for Tern species which are largely marine species.</p> <p>Core foraging range for Black-headed Gull is 18.5 km (Nature Scot, 2023<sup>24</sup>). Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The habitats within 500 m of the proposed development is built environment and disturbed, amenity grassland and is sub-optimal. More valuable habitat is present within the wider landscape. There will be no significant effects on SCI Black-headed Gull.</p> | No                              |

<sup>24</sup> Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency





| Site Code | Site Name             | Distance (km) | Qualifying Features (qualifying interests & special conservation interests)                                                                                                                                                                                                                                                                                                                                                                                  | Potential Effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Pathway for Significant Effects |
|-----------|-----------------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
|           |                       |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The core foraging range of Light-bellied Brent Goose is assumed to be ca. 15 km based on the data provided in (SNH, 2016 <sup>25</sup> ). Theoretically, the proposed development and 500 m disturbance zone overlap with the core foraging ranges of this SCI associated with the SPA. According to the Conservation Objective supporting document, Light-bellied Brent Goose, have a preference for foraging in intertidal areas with the Eelgrass ( <i>Zostera</i> sp) and will feed on improved grassland when their primary source of food becomes depleted. However, amenity grassland is located within the 500 m disturbance zone of the project and there are no NBDC records of Light-bellied Brent Goose within 500 m of the proposed development. Furthermore, installation works will be temporary in nature. There will be no significant effects on SCI Light-bellied Brent Goose. |                                 |
| 004006    | North Bull Island SPA | 14.7          | Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> ) [A046]<br>Shelduck ( <i>Tadorna tadorna</i> ) [A048]<br>Teal ( <i>Anas crecca</i> ) [A052]<br>Pintail ( <i>Anas acuta</i> ) [A054]<br>Oystercatcher ( <i>Haematopus ostralegus</i> ) [A130]<br>Golden Plover ( <i>Pluvialis apricaria</i> ) [A140]<br>Grey Plover ( <i>Pluvialis squatarola</i> ) [A141]<br>Knot ( <i>Calidris canutus</i> ) [A143]<br>Sanderling ( <i>Calidris alba</i> ) [A144] | The SPA is located outside of the ZOI of the proposed development and as such there is no potential for direct impacts on the SPA. However, consideration is given to potential for landscape/ecological connectivity.<br><br>This SPA is located c. 14.7 km from the proposed development.<br><br>The proposed development is located outside of the core foraging range of all avian SCIs with the exception of Black-headed Gull and Light-bellied Brent Goose.                                                                                                                                                                                                                                                                                                                                                                                                                                | No                              |

<sup>25</sup> Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



| Site Code | Site Name | Distance (km) | Qualifying Features (qualifying interests & special conservation interests)                                                                                                                                                                                                                                                                                                                                                                           | Potential Effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Pathway for Significant Effects |
|-----------|-----------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
|           |           |               | Dunlin ( <i>Calidris alpina</i> ) [A149]<br>Black-tailed Godwit ( <i>Limosa limosa</i> ) [A156]<br>Bar-tailed Godwit ( <i>Limosa lapponica</i> ) [A157]<br>Curlew ( <i>Numenius arquata</i> ) [A160]<br>Redshank ( <i>Tringa totanus</i> ) [A162]<br>Turnstone ( <i>Arenaria interpres</i> ) [A169]<br>Black-headed Gull ( <i>Chroicocephalus ridibundus</i> ) [A179]<br>Shoveler ( <i>Spatula clypeata</i> ) [A857]<br>Wetland and Waterbirds [A999] | <p>Core foraging range for Black-headed Gull is 18.5 km (Nature Scot, 2023<sup>26</sup>). Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The grassland within 500 m of the proposed development is built environment and disturbed, amenity grassland and is sub-optimal. More valuable habitat is present within the wider landscape. There will be no significant effects on SCI Black-headed Gull.</p> <p>The core foraging range of Light-bellied Brent Goose is assumed to be ca. 15 km based on the data provided in (SNH, 2016<sup>27</sup>). Theoretically, the proposed development and 500 m disturbance zone overlap with the core foraging ranges of this SCI associated with the SPA. According to the Conservation Objective supporting document, Light-bellied Brent Goose, have a preference for foraging in intertidal areas with the Eelgrass (<i>Zostera</i> sp) and will feed on improved grassland when their primary source of food becomes depleted. However, amenity grassland is located within the 500 m disturbance zone of the proposed development and there are no NBDC records of Light-bellied Brent Goose within 500 m of the proposed development. Furthermore, installation works of rooftop solar PV array, and the heat pump system will be temporary. There will be no significant effects on SCI Light-bellied Brent Goose.</p> |                                 |

<sup>26</sup> Nature Scot (2023) Guidance Note 3: Guidance to support Offshore Wind applications: Marine Birds - Identifying theoretical connectivity with breeding site Special Protection Areas using breeding season foraging ranges. Version 1: January 2023. Nature Scot, Scotland's Nature Agency

<sup>27</sup> Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



| Site Code | Site Name            | Distance (km) | Qualifying Features (qualifying interests & special conservation interests)                                                                                                                                                       | Potential Effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Pathway for Significant Effects |
|-----------|----------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| (000210)  | South Dublin Bay SAC | 12.1          | <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Embryonic shifting dunes [2110]</p> | <p>This SAC is located c. 12.1 km (direct distance) from the proposed development.</p> <p>The Camac River is located outside the southern boundary of Clondalkin Civic Centre and is hydrologically connected to the South Dublin Bay SAC (IE0000210) with an instream distance of c. 16.6 km.</p> <p>Given the nature and extent of the proposed works, the downstream distance (c. 16.6 km) and the assimilative nature of receiving and downstream surface waters and Dublin Bay (ID: IE_EA_090_0000)[, the proposed development will not give rise to a likely significant effect on South Dublin Bay SAC or its Qualifying Interests.</p> | No                              |



### 3.4 Other plans and projects considered for potential in-combination effects

Article 6(3) of the Habitats Directive requires that:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives”.*

It is therefore required that the likely significant effects of the proposed project are considered in-combination with any other plans or projects within the zone of influence.

As there are no meaningful pathways for effects identified with respect to European sites - given the nature of the habitats that will be affected by the project and the distance from relevant SPA location for SCI species. There are no further considerations required as the S-P-R model has been completed with no potential effects that could arise from the proposed project.

### 3.5 Screening Conclusion

The results of the S-P-R modelling process identified that - given the scale and nature of the potential sources identified in Section 3 - there are **no likely significant effects** identified to any European sites.

The AA screening process has considered potential effects which may arise during all phases of the proposed project. Through an assessment of the pathways for effects and an evaluation of the sources for impacts, taking account of the processes involved and the distance of separation from European sites, it has been evaluated that there are no likely significant effects on the qualifying interests, special conservation interest or the conservation objectives of any designated European site.



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