



South Dublin County Council

Development Plan 2016 – 2022

Proposed Variation No.3

Zoning Objective Amendment on Lands at Ballymount / Naas Road

*Statement in Support of Screening for
Appropriate Assessment (AA)*



South Dublin County Development Plan

Proposed Variation No. 3

Statement in support of Screening for Appropriate Assessment

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This report has been prepared by Minogue and Associates with all reasonable skill, care and diligence. Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

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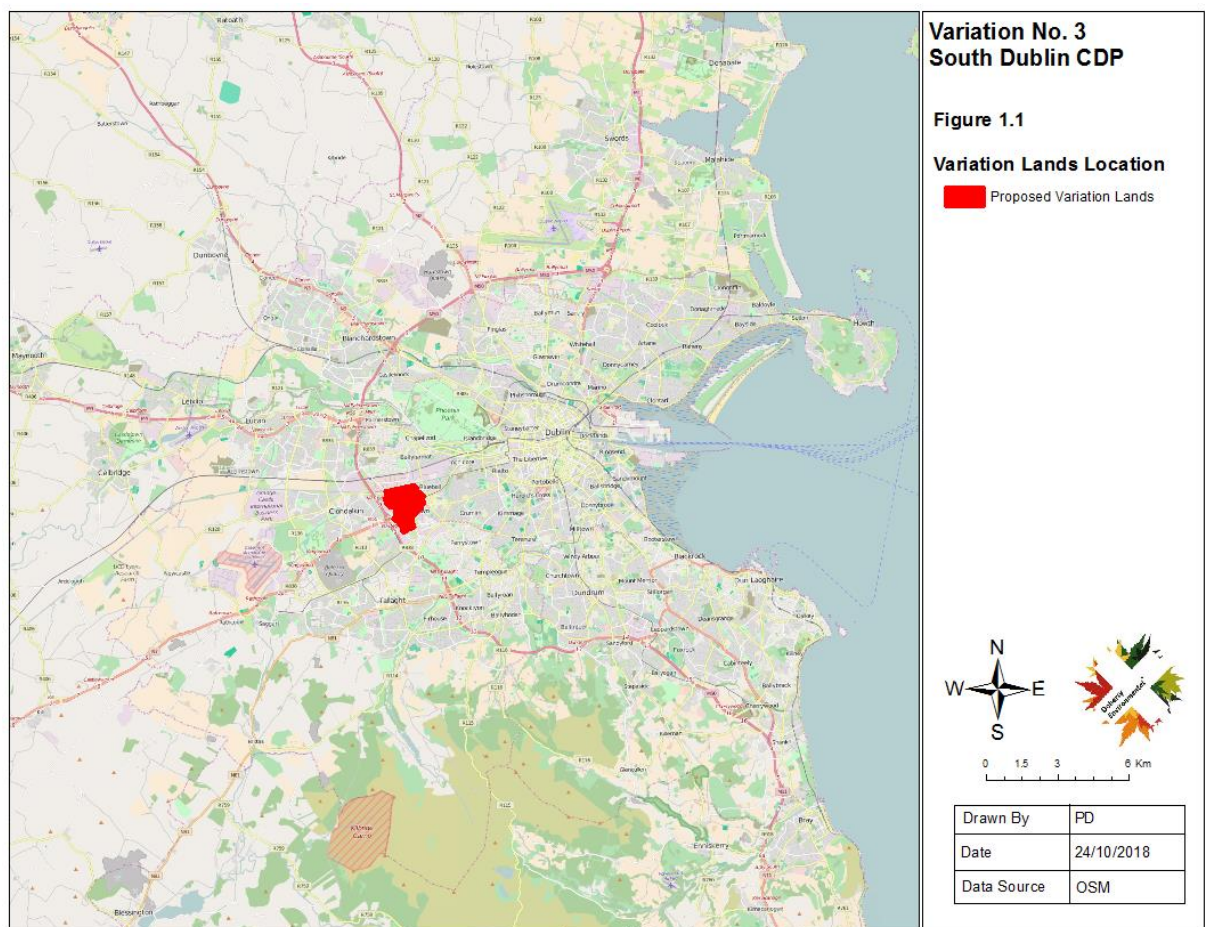
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1.0 INTRODUCTION

South Dublin County Council intends to initiate the procedures for making a variation to the County Development Plan under Section 13 of the Planning and Development Act 2000 (as amended). This variation will be Proposed Variation No. 3 to the South Dublin County Development 2016 – 2022. Minogue and Associates have been appointed by South Dublin County Council to prepare a statement in support of Screening for Appropriate Assessment for Proposed Variation No 3. The Proposed Variation No 3 lands are shown on Figure 1.1.

The function of this Screening Exercise is to identify the potential for the Proposed Variation No. 3 to result in likely significant effects to European Sites and to provide information so that the South Dublin County Council can determine whether a Natura Impact Report and Appropriate Assessment is required for Proposed Variation No 3.



1.1 HABITATS DIRECTIVE ASSESSMENT

Article 6(3) of the Habitats Directive requires an assessment of the potential effects of a land use plan or project on one or more Natura 2000 (N2K) Sites. It is noted that a Habitats Directive Assessment is commonly referred to as an “Appropriate Assessment” (Dodd *et al*, 2007). However “Appropriate Assessment” forms only one stage of the HDA process (all stages making up the assessment process are outlined in detail below). The EU Habitats Directive provides the legislative framework for the protection of habitats and species throughout Europe through the establishment of a network of designated conservation areas known as the N2K network. The N2K network includes sites designated as Special Areas of Conservation (SACs), under the EU Habitats Directive and Special Protection Areas (SPAs) designated under the EU Birds Directive. Under the European Communities (Birds and Natural Habitats) Regulations 2011, as amended) SACs and SPAs are referred to as European Sites. SACs are designated in areas that support habitats listed on Annex I and/or species listed on Annex II of the Habitats Directive. SPAs are designated in areas that support: 1% or more of the all-Ireland population of bird species listed on Annex I of the EU Birds Directive; 1% or more of the population of a migratory species; and more than 20,000 waterfowl.

Articles 6(1) & (2) of the Habitats Directive set out provisions for the conservation management of European Sites. Articles 6(3) and 6(4) of this Directive set out a series of procedural steps to test whether or not a plan or project is likely to affect a European Sites. Article 6(3) also establishes the requirement for a HDA:

“any plan or project not directly connected with or necessary to the management of the (European) site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public”.

Therefore, the objective of this Screening is to identify whether or not land use measures supported by the Proposed Variation No 3 will have the potential to adversely affect the Conservation Objectives of European Sites. Such a conclusion will be arrived at by assessing the implications of future developments that will be supported by the Proposed Variation No 3 on each European Site occurring within its zone of influence.

The HDA is underpinned by the precautionary principle. Therefore, if the risk of adverse impacts to the conservation objectives of a European Site cannot be ruled out it is assumed that the potential for an adverse impact will exist. Where such uncertainties are identified during the assessment, measures will be proposed to avoid or mitigate the risk of adverse impacts occurring.

The Screening was undertaken with reference to the following guidance documents on Habitats Directive Assessments:

- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009). DEHLG.
- Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats directive 92/43/EEC. European commission (2000). (To be referred to as MN 2000).
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats directive 92/43/EEC. European Commission (2001).

1.2 STAGES OF THE HABITATS DIRECTIVE ASSESSMENT

The European Commission (2001) Guidance has outlined a staged process for the completion of a HDA.

- Stage 1 – Screening: This stage defines the proposed plan, establishes whether the proposed plan is necessary for the conservation management of the European Site and assesses the likelihood of the plan to have a significant effect, alone or in combination with other plans or projects, upon a European Site.
- Stage 2 – Appropriate Assessment: If a plan or project is likely to have a significant effect an Appropriate Assessment must be undertaken. In this stage the impact of the plan or project

to the Conservation Objectives of the European Site is assessed. The outcome of this assessment will establish whether the plan will have an adverse effect upon the integrity of the European Site.

- Stage 3 – Assessment of Alternative Solutions: If it is concluded that, subsequent to the implementation of mitigation measures, a plan has an adverse impact upon the integrity of a European Site it must be objectively concluded that no alternative solutions exist before the plan can proceed.
- Stage 4 – Where no alternative solutions exist and where adverse impacts remain but imperative reasons of overriding public interest (IROPI) exist for the implementation of a plan or project an assessment of compensatory measures that will effectively offset the damage to the Natura site 2000 will be necessary.

The remainder of this document sets out the Methodology and Results of the Screening exercise. It is structured as follows:

Section 2: Habitats Directive Assessment Methodology;

Section 3: Summary Description of the Proposed Variation No. 3;

Section 4: Identifies the European Sites within the zone of influence of the Proposed Variation No. 3;

Section 5: Identifies the Likely Significant Effects of the Proposed Variation No. 3 to European Sites occurring within its zone of influence; and

Section 6: Provides a Screening conclusion.

2.0 SCREENING METHODOLOGY

The function of the Screening Assessment is to identify whether the Proposed Variation No 3 will have a likely significant effect on European Sites. In this context “likely” means any effect that may be reasonably predicted and “significant” means not trivial or inconsequential but an effect that is potentially relevant to the Site’s conservation objectives¹. Any effect, which would compromise the functioning and viability of a Site and interfere with achieving the conservation objectives of the Site would constitute a significant effect.

The nature of the likely interactions between the Proposed Variation No 3 and the Conservation Objectives of European Sites will depend upon the potential for future land use activities supported by the Proposed Variation No 3 to interact with European Sites and their associated qualifying features of interest; the sensitivity of European Site qualifying features to potential impacts associated with land use activities facilitated by the Proposed Variation No 3; the current conservation status of the European Site qualifying features; and the likely changes that will result from the implementation of the Proposed Variation No 3, in combination with other plans and projects.

The European Commission Guidelines (2001) outline the stages involved in undertaking a Screening assessment of a plan or project that has the potential to have likely significant effects on European Sites. The methodology adopted for the Screening of the Proposed Variation No. 3 is informed by these guidelines and was undertaken in the following stages:

1. A brief description of the Proposed Variation No. 3 is provided and determine whether it is necessary for the conservation management of European Sites;
2. Identification of European Sites occurring within the zone of influence of the Proposed Variation No. 3;
3. Identification of potential likely significant effects to European Sites; and

¹ See English Nature’s Habitat Regulations Guidance Note No. 3, 1999.

4. Identification of other plans or projects that, in combination with the Proposed Variation No. 3, have the potential to affect European Sites.

3.0 BRIEF DESCRIPTION OF PROPOSED VARIATION NO.3

South Dublin County Council (SDCC) has prepared a Variation to the County Development Plan under Section 13 of the Planning and Development Act 2000 (as amended). The Proposed Variation No 3 provides for the following:

Proposed Variation No 3 to the South Dublin County Development Plan 2016 - 2022 is proposed to zone 178 hectares of the Employment and Enterprise (EE) zoned lands in the Naas Road / Ballymount area for Regeneration (REGEN). Through the 'REGEN' zoning objective, South Dublin County Council seeks to facilitate the regeneration of existing brownfield lands, close to existing and proposed transport nodes, to provide for a more intensive mix of enterprise / and/or residential led development.

This rezoning, will form a variation to the existing South Dublin County Development Plan 2016-2022. This plan came into effect in June 2016 and established the framework for the development over a six year period for the County. The South Dublin County Council Development Plan was subject to Strategic Environmental Assessment and Habitats Directive Assessment. Within the hierarchy of landuse plans, Proposed Variation No 3 should be compliant with the policies, objectives of the County Development Plan, as well as national and regional plans and guidelines.

The elements of the Proposed Variation No 3 are as follows:

1). Land Use Zoning Map change. Increase 'REGEN' zoning in Naas Road area by circa 178 ha as a replacement of existing 'EE' zoning

2). Amendment to the Core Strategy figures as follows:

- Increase the New Regeneration lands in Table 1.9 of the Core Strategy (proposed changes are shown in red with original values shown in strike-through).
- Insert Footnotes and amend figures in Table 1.9 - Amend figures in Table 1.10 South Dublin County Development Plan 2016 -2022 Total Capacity

Table 1.9 (of the CDP)- NEW RESIDENTIAL AND MIXED USE ZONING 2016 -2022

| HIERARCHY | New Zonings | Housing Capacity | New REGEN Zoning | Housing Capacity | TOTAL (HA) | TOTAL (UNITS) |
|--|-------------|------------------|------------------|------------------|------------|---------------|
| | | | | | | |
| Consolidation Areas within the Gateway | | | | | | |
| Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown, Knocklyon, Firhouse / Ballycullen and parts of Greenhills, Terenure and Rathfarnham. | 0 | 669 | 256 v78 | 2419 vv | 256 78 | 3088 |
| Metropolitan Consolidation Towns | | | | | | |
| Tallaght | 10 | 820 | 58 | 1444 | 67 | 2264 |
| Lucan (inc. Adamstown) | 4 | 151 | 2 | 26 | 6 | 177 |
| Clondalkin (inc. Clonburris) | 41 | 0 | 0 | 0 | 41 | 0 |
| Moderate Sustainable Growth Towns | | | | | | |
| Saggart / Citywest | 3 | 120 | 0 | 0 | 3 | 120 |
| Small Towns (within the Metropolitan Green Belt) | | | | | | |
| Newcastle | 0 | 0 | 0 | 0 | 0 | 0 |
| Rathcoole | 5 | 100 | 0 | 0 | 5 | 100 |
| Rural Areas | | | | | | |
| Metropolitan Area | | | | 75 | | 75 |
| Hinterland Area | | | | 25 | | 25 |
| Total | 63 | 1860 | 316 137 | 3989 | 379 200 | 5849 |

New footnotes:

v - Additional 178 ha added as part of Variation No.3 (Q1 2019)

vv - Additional strategic long term units excluded from new residential capacity. Assumed that the additional land bank of REGEN at Naas Road will not exceed 2,419 units in the life time of this Plan

Table 1.10 (of the CDP): South Dublin County Development Plan 2016 -2022 Total Capacity

| HIERARCHY | TOTAL LAND (HA) | TOTAL CAPACITY (UNITS) |
|--|-----------------|------------------------|
| | | |
| Consolidation Areas within the Gateway | | |
| Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown, Knocklyon, Firhouse / Ballycullen and parts of Greenhills, Terenure and Rathfarnham. | 473 295 | 9620 |
| Metropolitan Consolidation Towns | | |
| Tallaght | 156 | 5412 |
| Lucan (inc. Adamstown) | 218 | 8304 |
| Clondalkin (inc. Clonburris) | 315 | 10748 |
| Moderate Sustainable Growth Towns | | |
| Saggart / Citywest | 138 | 4196 |
| Small Towns (within the Metropolitan Green Belt) | | |
| Newcastle | 28 | 701 |
| Rathcoole | 44 | 1062 |

| | | |
|-------------------------------------|----------------------------|--------------|
| Rural Areas | | |
| Metropolitan Area | 0 | 75 |
| Hinterland Area | 0 | 25 |
| Completions 2011 to jan 2015 | | 1,001 |
| | | |
| Total | 1372 1194 | 41144 |

3). Amend CS6 SLO 1 of the County Development Plan (page 24)

CS6 SLO 1:

To initiate a plan led approach to the sustainable regeneration of the brownfield lands in the Naas Road / Ballymount REGEN zoned lands. The plan led approach will include the preparation of a masterplan in 2019 with a view to preparing a Local Area Plan or other appropriate mechanism for the Regeneration (REGEN) and Local Centre (LC) at Walkinstown zoned lands. The masterplan will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework Plan (2010).

Delete

~~prepare a Ballymount Local Area Plan for lands zoned REGEN, EE, and LC, stretching southwest from Walkinstown Roundabout along the Greenhills Road (including those areas adjacent to Greenhills Estate) to the M50, north from there to the Red Cow, east from there along the Naas Road to the city boundary, and along the boundary back to Walkinstown Roundabout. The subject Local Area Plan to be concluded by the end of 2018; and the lands north of this between the M50, the Grand Canal and city boundary currently zoned EE to be considered for inclusion in this plan. The Naas Road Framework Plan (2010) to be taken into consideration during the preparation of the Local Area Plan.~~

3.1 PROPOSED VARIATION & NATURA CONSERVATION MANAGEMENT

The Proposed Variation No. 3 seeks to establish the South Dublin County Council's vision and ambition for the Naas Road/ Ballymount lands within the planning framework of the South Dublin CDP. This vision and ambition seeks to transform this brownfield area of national significance into a sustainable, vibrant, mixed use urban quarter that capitalises on its strategic location, creating a sense of identity and place that reaches out and connects with the surrounding urban context. Its transformation will be a model of sustainable brownfield regeneration, incorporating mixed use neighbourhoods, a diverse innovation- based economy contributing to regional and national economic prosperity, supported by exemplary social and physical infrastructure, all contained within a coherent and legible urban structure where quality of life is championed. The medium to long-term vision for the regeneration of the Naas Road / Ballymount lands will be achieved in accordance with national, regional and local government policy, plans and guidelines.

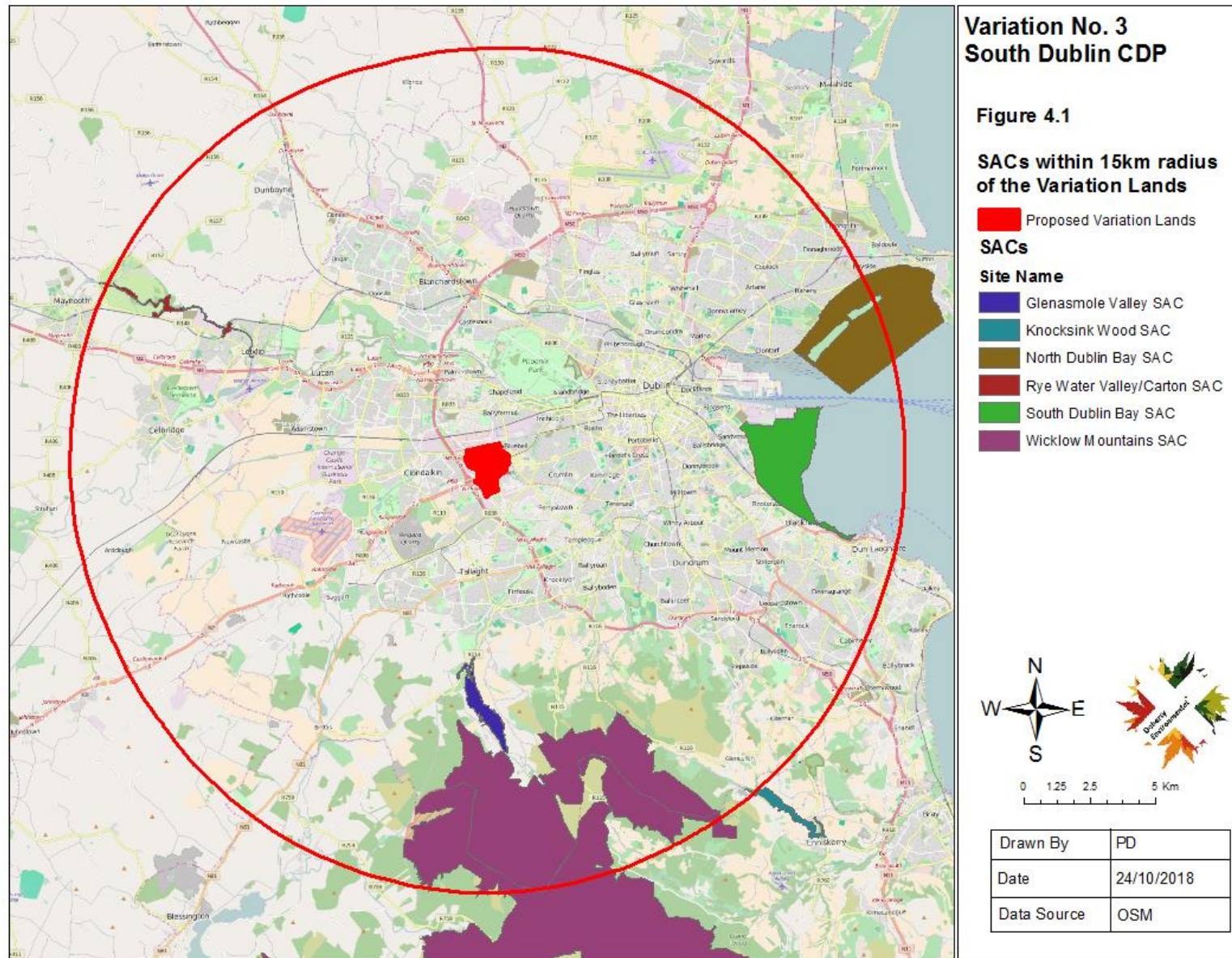
It is clear from strategic objectives of the Proposed Variation No. 3, as outlined above, that it is not necessary for the management of any European Site for nature conservation purposes. Therefore consideration is given to the Plan and whether it has the potential to result in likely significant effects to European Sites and their Conservation Objectives.

4.0 IDENTIFICATION OF EUROPEAN SITES WITHIN THE ZONE OF INFLUENCE OF THE PROPOSED VARIATION

In order to identify the European Sites that could be significantly affected by the implementation of the Proposed Variation No. 3 an initial long-list of sites occurring within a 15km radius of the variation area (to be referred to as the study area) has been compiled. The establishment of a 15km buffer area surrounding the subject area is in line with the DAHLG recommended procedures for identifying European Sites. The buffer distance of 15km was also considered sufficient to ensure all potential impacts to European Sites arising from the implementation of the Plan were taken into account (see Section 4.1 below for more information). This is based on the absence of any impact pathways between the subject lands and other European Sites occurring at a distance greater than 15km from these lands.

4.1 EUROPEAN SITES WITHIN 15KM OF THE PLAN

A total number of nine European Sites, comprising six SACs and three SPAs, were identified within a 15km radius of the Proposed Variation No 3 area (see Figures 4.1 and 4.2). These European Sites along with their qualifying features of interest are presented in Table 4.1.



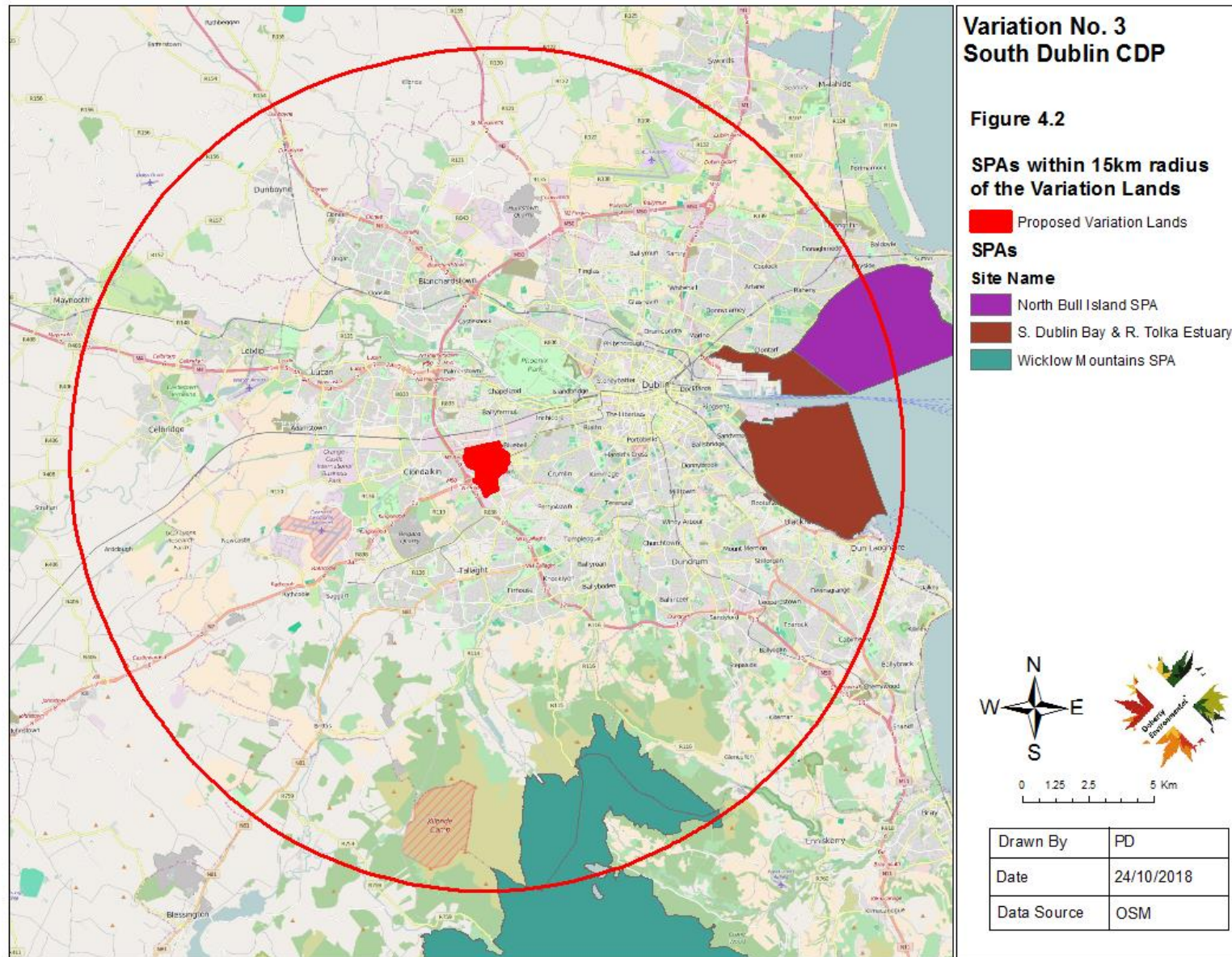


Table 4.1: European Sites within 15km of the Proposed Variation Area

| European Sites | Distance from Study Area | Qualifying Features of Interest/Special Conservation Interests |
|----------------------|--------------------------|---|
| South Dublin Bay SAC | 9km to the east | Mudflats and sandflats not covered by seawater at low tide [1140] |
| | | Annual vegetation of drift lines [1210] |
| | | Salicornia and other annuals colonising mud and sand [1310] |
| | | Embryonic shifting dunes [2110] |
| North Dublin Bay SAC | 12km to the east | Mudflats and sandflats not covered by seawater at low tide [1140] |
| | | Annual vegetation of drift lines [1210] |
| | | Salicornia and other annuals colonising mud and sand [1310] |
| | | Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330] |
| | | Mediterranean salt meadows (Juncetalia maritimi) [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] |
| South Dublin Bay & Tolka Estuary SPA | 9km to the east | Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) |
| | | Oystercatcher (<i>Haematopus ostralegus</i>) |
| | | Ringed Plover (<i>Charadrius hiaticula</i>) |
| | | Grey Plover (<i>Pluvialis squatarola</i>) |
| | | Knot (<i>Calidris canutus</i>) |
| | | Sanderling (<i>Calidris alba</i>) |

| | | |
|-----------------------|------------------|--|
| | | Dunlin (<i>Calidris alpina</i>) |
| | | Bar-tailed Godwit (<i>Limosa lapponica</i>) |
| | | Redshank (<i>Tringa totanus</i>) |
| | | Black-headed Gull (<i>Croicocephalus ridibundus</i>) |
| | | Roseate Tern (<i>Sterna dougallii</i>) |
| | | Common Tern (<i>Sterna hirundo</i>) |
| | | Arctic Tern (<i>Sterna paradisaea</i>) |
| North Bull Island SPA | 12km to the east | Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) |
| | | Shelduck (<i>Tadorna tadorna</i>) |
| | | Teal (<i>Anas crecca</i>) |
| | | Pintail (<i>Anas acuta</i>) |

| | | |
|--|--|--|
| | | Shoveler (<i>Anas clypeata</i>) |
| | | Oystercatcher (<i>Haematopus ostralegus</i>) |
| | | Golden Plover (<i>Pluvialis apricaria</i>) |
| | | Grey Plover (<i>Pluvialis squatarola</i>) |
| | | Knot (<i>Calidris canutus</i>) |
| | | Sanderling (<i>Calidris alba</i>) |
| | | Dunlin (<i>Calidris alpina</i>) |
| | | Black-tailed Godwit (<i>Limosa limosa</i>) |
| | | Bar-tailed Godwit (<i>Limosa lapponica</i>) |
| | | Curlew (<i>Numenius arquata</i>) |
| | | Redshank (<i>Tringa totanus</i>) |

| | | |
|-----------------------|-----------------------|--|
| | | Turnstone (<i>Arenaria interpres</i>) |
| | | Black-headed Gull (<i>Larus ridibundus</i>) |
| Knocksink Woods SAC | 14.8 to the southeast | Petrifying springs with tufa formation (Cratoneurion) [7220] |
| | | Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0] |
| Glenasmole Valley SAC | 6km to the south | Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] |
| | | Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] |
| | | Petrifying springs with tufa formation (Cratoneurion) [7220] |
| Wicklow Mountain SAC | 8.5km to the south | Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] |
| | | Natural dystrophic lakes and ponds [3160] |
| | | Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] |

| | | |
|--|--|--|
| | | European dry heaths [4030] |
| | | Alpine and Boreal heaths [4060] |
| | | Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130] |
| | | Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] |
| | | Blanket bogs (* if active bog) [7130] |
| | | Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] |
| | | Calcareous rocky slopes with chasmophytic vegetation [8210] |
| | | Siliceous rocky slopes with chasmophytic vegetation [8220] |
| | | Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] |
| | | <i>Lutra</i> (Otter) [1355] |

| | | |
|----------------------|----------------------|--|
| Rye Water Valley SAC | 9km to the northwest | Petrifying springs with tufa formation (Cratoneurion) [7220] |
| | | Vertigo angustior (Narrow-mouthed Whorl Snail) [1014] |
| | | Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016] |
| Wicklow Mountain SPA | 8.5km to the south | Merlin (Falco columbarius) |
| | | Peregrine (Falco peregrinus) |

4.2 EUROPEAN SITES WITHIN THE ZONE OF INFLUENCE OF THE PROPOSED VARIATION

The next step of this Screening Exercise is to identify which, if any of these sites listed in Table 4.1 above occur within the zone of influence of the Proposed Variation No 3 Lands. As the nearest European Site (Glenasmole Valley SAC) is located at a remote distance (approximately 6km) from the subject lands, Proposed Variation No 3 will not have the potential to result in direct impacts to European Sites. Thus this Screening exercise focuses on investigating whether the proposed change in zoning at the Variation Lands will have the potential to result in indirect effects to European Sites or affect mobile species associated with European Sites beyond the boundaries of their designated conservation areas.

A source-pathway-receptor model has been used to establish which European Sites could occur within the sphere of influence of potential indirect impacts. Under such a model the project, as described above, represents the source.

Potential impact pathways are restricted to hydrological and aerial pathways as these represent the principal emissions generated by activities at the project site. Any European Sites occurring downstream of, or otherwise linked to the Variation Lands via hydrological pathways are considered to occur within the zone of influence of the Proposed Variation No 3. Other potential emission pathways such as noise, emissions to atmosphere etc. are not considered due to the distance between the Variations lands and the nearest European Sites, which is over 6km. It is considered that due to this distance and the nature of future developments to be supported by the proposed change in land use to Regeneration will not have the potential to result in project that could negatively effect air quality at such distances from the Variation lands. The potential for qualifying species of surrounding European Sites to interact with the study area is also included as a potential impact pathway.

The receptors represent European Sites and their associated qualifying features of interest.

European Sites and their associated qualifying features are likely to occur in the zone of influence of the project only where the above pathways establish a link between the Variation lands and European Sites or where the project site is likely to play an important role in supporting populations of mobile species that are listed as special conservation

interests/qualifying species for surrounding European Sites. Table 4.2 provides a determination as to whether each European Site within a 15km buffer distance of the project site occur within the sphere of influence of the project. This determination has been undertaken in line with the following assessment questions:

- Is there a hydrological pathway linking the Project site to European Sites and does this pathway have the potential to function as an impact pathway?
- Are qualifying habitats of these European Sites at risk of experiencing impacts as a result of the project?
- Does the project site have the potential to interact with or support Annex II qualifying species/special conservation interest species of these European Sites?

Table 4.2: Identification of European Sites within the Zone of Influence of the proposed Variation

| European Sites | Is there a Hydrological Pathway and does it have the potential to function as an Impact Pathway | Do the Project have the potential to interact with Mobile Species within the Variation Lands | Do European Sites occur within the Projects Zone of Influence? |
|-----------------------|--|--|--|
| Rye Water Valley SAC | No. This SAC is located within a separate surface water catchment to the proposed Variation Lands. | No. No mobile species are listed as qualifying features of interest for this SAC. | Yes. The potential for aerial emission pathways has been identified and further examination of this pathway is required. |
| Glenasmole Valley SAC | No. This SAC is designated for the presence of the Annex 1 habitats grassland habitats and petrifying spring. The grassland habitats do not rely on lotic processes while the spring relies on soligenous hydrological processes. Furthermore this SAC is located within a separate surface water catchment to the proposed Variation Lands. | No. No Annex 2 species are listed as qualifying features of interest for this SAC. | No. No impact pathways link the Variation Lands to this SAC. |

| | | | |
|-----------------------|---|---|---|
| Wicklow Mountains SAC | No. This SAC is designated for the presence of the Annex 1 upland peatland and grassland habitats. Furthermore this SAC is located within a separate surface water catchment to the proposed Variation Lands. | No. Otters are the only Annex 2 species listed as qualifying species for this SAC. The Variation Lands are located in an urban area at a considerable distance from the nearest watercourses associated with this SAC. The watercourses occurring within the Variation lands are not suitable for supporting otters. Large sections of these watercourses are culverted detracting from their potential to support this species. In light of this otters are not likely to use these watercourses and this species will not be affected by future land use facilitated by the proposed Variation. | No. This SAC and its qualifying features of interest are not located within the zone of influence of the Variation lands. |
| Knocksink Woods SAC | No. This SAC is designated for the presence of the Annex 1 habitats alluvial woodland and petrifying spring. The alluvial woodland and springs are located within a separate sub-catchment to the Variation lands . | No. No Annex 2 species are listed as qualifying features of interest for this SAC. | No. No impact pathways link the Variation Lands to this SAC. |

| | | | |
|----------------------|---|---|---|
| Wicklow Mountain SPA | No. This is an upland SPA designated for its role in supporting merlin and Peregrine falcon. There is no hydrological pathway linking the study area to this SAC. | No. The study area is not predicted to play an important role in terms of the provision of roosting, nesting or foraging habitat for either merlin or Peregrine falcon. | No. No potential impact pathways link the project site to this SPA. |
| South Dublin Bay SAC | No. Modelling of the Liffey Estuary and Dublin Bay has shown that the waters from the Liffey draining into Dublin Bay are deflected east and north towards Dollymount and Howth. The presence of the South Great Wall in Dublin Bay provides a barrier to the movement of waters towards the south (Bedri et al., 2012; Camp, Dresser & McKee, 2012). As such there is no effective hydrological pathway between the project site and this SAC. | No. No Annex 2 species are listed as qualifying features of interest for this SAC. | No. No potential impact pathways link the project site to this SAC. |
| North Dublin Bay SAC | Yes. This SAC is located downstream of the Variation lands and the waters from the Camac catchment and the River | No. This SAC supports a population of the liverwort <i>Petalophyllum ralfsii</i> . This is a sedentary species, reliant on terrestrial dune slack habitats occurring | Yes. The potential hydrological pathways linking the Variation Lands to this SAC require further examination to establish |

| | | | |
|--------------------------------------|---|--|--|
| | Liffey drain to qualifying habitats of this SAC. | on Bull Island and there is no potential for the Variation to interact with this species. | whether or not they have the potential to function as impact pathways. |
| North Bull Island SPA | Yes. This SPA is located downstream of the Variation lands and the waters from the Camac catchment and the River Liffey drain to wetland habitats of this SPA. The special conservation interest bird species of this SPA rely on these wetland habitats for foraging and roosting. | No. This SPA is designated for its role in supporting a number of wetland bird species. Individuals associated with the SPA populations of these species are very unlikely to rely on the Variation lands which are comprised of dense urban land use. | Yes. The potential hydrological pathways linking the Variation Lands to this SPA require further examination to establish whether or not they have the potential to function as impact pathways. |
| South Dublin Bay & Tolka Estuary SPA | Yes. This SPA is located downstream of the Variation lands and the waters from the Camac catchment and the River Liffey drain to wetland habitats of this SPA. | No. This SPA is designated for its role in supporting a number of wetland bird species. Individuals associated with the SPA populations of these species are very unlikely to rely on the Variation lands which are comprised of dense urban land use. | Yes. The potential hydrological pathways linking the Variation Lands to this SPA require further examination to establish whether or not they have the potential to function as impact pathways. |

Table 4.2 above outlines the relationship between the project site and the European Sites occurring within the surrounding 15km buffer area of the Variation lands. Of the nine European Sites occurring within a 15km radius of the Variation Lands, three have been identified as occurring within the zone of influence of the proposed rezoning. These European Sites are:

1. South Dublin Bay River Tolka Estuary SPA
2. North Dublin Bay SAC
3. North Bull Island SPA

The remainder of this Screening aims to identify whether the project will have the potential to result in likely significant effects to these European Site

4.3 CONSERVATION OBJECTIVES FOR INTEREST FEATURES OF EUROPEAN SITES OCCURRING WITHIN THE ZONE OF INFLUENCE OF THE PROJECT

Generic conservation objectives for all European Sites have been established by the National Parks and Wildlife Service (NPWS). The generic conservation objective for the two habitats occurring within the zone of influence of the project is to maintain the favourable conservation status of these habitats. The favourable conservation status of these habitats is achieved when:

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

The generic conservation objective for the qualifying species occurring within the zone of influence of the project is to maintain or restore the favourable conservation status of these species. This is achieved when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long- term basis as a viable component of its natural habitats, and
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

4.4 THREATS & PRESSURE TO THE EUROPEAN SITES OCCURRING WITHIN THE PLAN ZONE OF INFLUENCE

Threats and pressures to the European Sites and qualifying features of interest in Ireland have been documented by the National Parks and Wildlife Service at two levels, namely at the European Sites level and at the qualifying feature of interest/ Annex 1 habitat and Annex 2 species level. The threats and pressures to European Sites are documented by the NPWS in the Natura 2000 - Standard Data Forms for each SAC. The Natura 2000 - Standard Data Forms for the South Dublin Bay River Tolka Estuary SPA; North Dublin Bay SAC; and North Bull Island SPA. The threats and pressures to individual habitats and species listed on Annex 1 and Annex 2 of the Habitats Directive have been documented at a national level in Ireland's most recent Article 17 submission to the EU, titled *The Status of EU Protected Habitats and Species in Ireland* (NPWS, 2013). The threats and pressures identified at the three European Sites occurring with the zone of influence of the project are outlined in Table 4.3 below.

Table 4.3: Threats and Pressures to European Sites occurring within the Zone of Influence of the Variation Lands

| European Sites | Threats & Pressures |
|----------------------|---|
| North Dublin Bay SAC | <ul style="list-style-type: none"> • Urbanised areas, human habitation • Walking, horseriding and non-motorised vehicles • Golf course |

| | |
|--|--|
| | <ul style="list-style-type: none"> • Industrial or commercial areas • Discharges |
| North Bull Island SPA | <ul style="list-style-type: none"> • Disposal of household / recreational facility waste • Golf Course • Industrial or commercial areas • Walking, horseriding and non-motorised vehicles • Bridge, viaduct • Roads, motorways • Discharges |
| South Dublin Bay River Tolka Estuary SPA | <ul style="list-style-type: none"> • Walking, horseriding and non-motorised vehicles • Reclamation of land from sea, estuary or marsh • Discharges • Roads, motorways • Industrial or commercial areas |

5.0 LIKELY SIGNIFICANT EFFECTS OF THE PROPOSED VARIATION TO EUROPEAN SITES OCCURRING WITHIN ITS ZONE OF INFLUENCE

The potential ecological effects of future development supported by Proposed Variation No 3 will include:

- Habitat loss and fragmentation;
- Habitat degradation resulting from emissions to surface water;
- Habitat degradation resulting from emissions to groundwater;
- Habitat degradation resulting from the spread of non-native invasive species during works within enterprise zones; and
- Disturbance and/or displacement of qualifying species from within or outside European Sites.

Due to the hydrological pathway linking the Variation lands to the three European Sites at Dublin Bay it cannot be ruled out that:

- future developments facilitated by the Proposed Variation No 3 will not result in such effects; and
- that, should such effects occur, they will not result in likely significant effects to the three European Sites and their associated qualifying features of interest at Dublin Bay.

5.1 IN-COMBINATION EFFECTS WITH OTHER PLANS & PROJECTS

As part of the Habitats Directive Article 6(3) assessment process consideration must be given to the potential for the Variation to combine with other plans or projects to result in cumulative negative effects to European Sites. Consideration has been given for this Plans

potential to combine with a number of other plans relevant to the wider surrounding area.

These plans include:

- Eastern and Midland Assembly Draft Regional Spatial and Economic Strategy 2018 (RSES)
- National Planning Framework 2018 (NPF)
- The Transport Strategy for the Greater Dublin Area, 2016-2035
- Water Services Strategic Plan
- Neighbouring County Development Plans
- River Basin District Management Plans
- CFRAMS Study
- Greater Dublin Drainage
- The Greater Dublin Transport Strategy 2016-2035
- Ballymount Road Extension
- Greenhill Road upgrade and links
- Ballymount Industrial Estates Street Network
- Oak Road Extension
- South Dublin Heritage Plan 2014-2019

6.0 SCREENING CONCLUSION

The Screening of the Proposed Variation No.3 as set out above shows that, in the absence of appropriate mitigation measures, it cannot be ruled out that Proposed Variation No 3 and the future developments facilitated by it, will not have the potential to result in likely significant effects to the following European Sites and their qualifying features of interest:

1. South Dublin Bay River Tolka Estuary SPA
2. North Dublin Bay SAC
3. North Bull Island SPA

Due to the potential risk of such effects occurring following the implementation of Proposed Variation No 3, it has been concluded that Variation has the potential to result in significant effects to European Sites. As such, a Natura Impact Report (NIR) is required to inform an Appropriate Assessment of Proposed Variation No 3.