

PROPOSED DEVELOPMENT OF 3G PITCH AT GREENHILLS PARK

Appropriate Assessment Screening Report

Prepared for:
South Dublin County Council



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Abstract: This document is to inform the Competent Authority in carrying out their statutory obligations relating to the Habitats Directive requirement for Appropriate Assessment for plans and projects seeking consent. Appropriate Assessment is required under Article 6 (3) of the Habitats Directive for any project or plan that may give rise to significant effects on a European (Natura 2000) site.

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1. INTRODUCTION

Fehily Timoney and Company (FT) have been commissioned by South Dublin County Council (SDCC) to prepare this Appropriate Assessment Screening Report, for the proposed installation of a 3G Pitch and a single-storey pavilion building, and the realignment of an existing footpath, within the confines of Greenhills Park in in Greenhills, Dublin 12. .

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).

1.1 Legislative Context

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) 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).



1.2 Methodology

1.2.1 Guidance

The assessment was conducted in accordance with the following guidance:

- 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).
- 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).
- 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.
- Interpretation Manual of European Union Habitats. Version EUR 28. (European Commission, 2013)
- OPR Practice Note PN01 Appropriate Assessment Screening for Development Management, (Office of the Planning Regulator, 2021).

1.2.2 Process

The process of determining the likelihood of significant effects from a proposed project on European sites is an iterative process centred around a Source-Pathway-Receptor model as per OPR, 2021. In order 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. groundwater connecting to nearby qualifying wetland habitats; 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 project that is known to interact with the receiving environment. A receptor is the Qualifying Interests (QI)¹ for an SAC or Special Conservation Interests (SCI)² for an SPA or an ecological feature that is known to be utilised by the QI/SCI. In practice, the term Qualifying Interests 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.

¹ 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.

² 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.



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 plan or project in any of its phases, or adjacent to them;
- Any European sites within the likely zone of influence of the plan or project. European sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, 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 plan or project.

The Zol of a proposed project is the geographical area over which it could affect the receiving environment in a way that could have potential effects on the Qualifying Interests of a European site.



2. DESCRIPTION OF THE PROJECT

2.1 Overview of the Proposed Development

SDCC is preparing a Part 8 Application for the development of a new artificial grass pitch and associated ancillary infrastructure, at Greenhill Parks in Co. Dublin. The proposals for this development are:

- The construction of a synthetic grass 3G all-weather sports pitch.
- The pitch will be surrounded by rebound panel fencing and a low kickboard.
- 13-metre-high ball-stop fencing at the rear of each goal
- 6 no. floodlighting columns
- One single storey pavilion building consisting of two individual team changing rooms each with one WC area, one club storage area, and one plant room, all with individual access.
- All associated ancillary works in adjacent areas including but not limited to foul & surface water drainage and utility supplies
- Realignment of existing footpath over a length of 112 metres
- All related hard and soft landscape works including connecting footpaths and associated planting
- Storage Areas
- CCTV

The footprint of the proposed pitch site is 1.45 hectares (ha). The proposed pitch will be lit by floodlighting along the pitch perimeter. The proposed pavilion (108.56 m²) will provide for changing and storage facilities with individual access.

The proposed development will involve the removal of eight existing trees³ and an amendment (amounting to 112 m) to the existing footpath to the east of the proposed pitch. Trees will be felled using a chainsaw and stumps will be removed using a stump grinder, with resulting mulch used within the park.

Tree planting will be carried out at the park towards the end of the construction and installation works.

2.2 Purpose/Rationale of the Proposed Development

In accordance with the South Dublin County Development Plan 2022-2028, the zoning objective for the proposed development location is 'OS – to preserve and provide for open space and recreational amenities'. The proposed development will provide a 3G pitch for all-weather sports activities for local clubs, enhancing the recreational and amenity of the lands.

³ Trees referenced as 1PHA, 15V7, 1PHB, 1PHC, 1PHD, 1PHE, 15V6, and 15V5 within *the Schedule of Tree Data Greenhills Park Co. Dublin* (South Dublin County Council, August 2025)



2.3 Construction Phase of the Proposed Development

2.3.1 Overview of Proposed Construction Works

The principal construction works will involve felling of the existing trees within the proposed pitch boundary and removal of stumps through the use of chainsaws and stump grinders, followed by the construction of an artificial pitch with 3G Artificial Turf. A section of the existing pathway to the east of the proposed development site will be removed, followed by the re-installation of a new section of tarmacadam pathway (totalling 112 m in length) to allow for the reconnection of pedestrian routeways.

This will then be followed by the installation of the 3G pitch. The pitch will be surrounded by rebound panel fencing and a low kickboard. The proposed development will also provide for ball stop nets and floodlighting columns in accordance with a detailed lighting design.

The proposed pavilion unit will be fabricated at an off-site industrial facility. Construction activities relating to the installation of this unit are as follows:

- Stripping of top-soil.
- Excavation of ground to formation level to accommodate laying of modular unit base. The typical foundation dig for the proposed modular units would be approximately 0.8 – 1m in depth.
- Laying of the modular unit base.
- Craneage of the modular unit.
- Placement/installation of modular unit on-site.
- Installation of external finishes.
- Minor trenching for and laying of foul water and water supply pipelines, in accordance with Electricity Supply Board and Uisce Éireann required depths and standards. Proposed connections for foul water and water supply will be along the eastern perimeter of the proposed pitch, connecting into existing services at Saint James Road to the south of Greenhills Park.
- Minor backfilling/reprofiling works.
- Fit out / ancillary works / mechanical and electrical works.

Installation of drainage infrastructure (See Drainage Strategy in Section 2.4.5 of this report) will be carried out.

Typical plant that will be utilised on-site during construction involves:

- Tractors
- Excavators
- Dumpers
- Rollers

A temporary construction compound will be located to the western end of the proposed development site over the construction phase. Approximately 10 no. construction workers will be employed for the proposed development over varying stages of works.

The planting of trees will be carried out towards the end stages of the construction and installation works.



2.3.2 Construction Hours

The construction phase will involve standard working hours, i.e., 08:00 to 18:00 on Monday to Friday.

2.3.3 Environmental Management during Construction

All works will be carried out in accordance with a prospective Construction and Environmental Management Plan (CEMP).

Fuel management on-site will be determined and undertaken by the appointed contractor at tender stage. Fuelling operations, if required, will be undertaken on bunded areas and any storage will be undertaken using bunded tanks.

A prospective Surface Water Plan will also be adopted, with appropriate barrier controls to prevent any polluted surface water runoff from entering the receiving environment.

The proposed development is not foreseen to produce a significant quantity of waste as significant excavations will not be required. Any waste generated will be managed at an appropriately authorised off-site waste management facility.

2.4 **Operational Phase of the Proposed Development**

2.4.1 Use and Maintenance of the 3G Pitch

The pitch will be used for all-weather sports activities for local clubs. Maintenance activities to be undertaken for the pitch over the operation of the proposed development will involve brushing, raking and sweeping of the artificial surfaces.

2.4.2 Use of Pavilion

The pavilion unit will be used by users of the 3G pitch, including local sports clubs, for changing and storage facilities. The pavilion unit will provide sanitary facilities for users.

2.4.3 Utilities

Water supply and foul water connections will be provided for sanitary facilities at the pavilion unit. The unit will be connected to the existing mains situated at Saint James Road, to the south of Greenhills Park.

2.4.4 Energy

The modular unit will be designed to achieve an A2 Building Energy Rating in accordance with the Nearly Zero Energy Building (NZEB) Standards. Specifics of how this will be achieved will be explored with a Mechanical and Electrical (M&E) Engineer, once appointed post planning. Photovoltaic (PV) solar panels may potentially be used, subject to evaluation by the appointed M&E Engineer.



2.4.5 Drainage Strategy

The drainage strategy, in line with SDCC policy, will consider the use of Sustainable Drainage System (SuDS) approach. Accumulation of surface water on the pitch over the operational phase will be managed to attenuate stormwater and prevent excess flows and potential discharge of silt. A lateral drainage system will be used, which involves directing surface water into a carrier drainage system before discharging through a silt trap chamber and a soakaway (to be agreed on-site). Where appropriate, additional SuDS features such as swales may be incorporated into the drainage strategy.

2.5 Existing Environment

The overall development site is located in the western end of Greenhills Park in the townlands of Greenhills and Limekilnfarm, Dublin 12. The proposed development will occur at an existing playing pitch. Greenhills Park is situated in an urban context (in the form of commercial buildings; residential dwellings and gardens, schools and local roads). The gardens of residential dwellings are located to the west and south of the project. Greenhills Community College is located behind a treeline to the south-east of the proposed development and other grass pitches and treelines adjoin the northern, southern and sections of the eastern boundary. Existing footpaths are located along the inner boundary of Greenhills Park and bisects the park at various points.

2.5.1 Description of Existing Ecological Baseline

2.5.1.1 *Desktop Assessment*

A desk study was carried out in August 2025 to collate available information on the existing natural environment at the project location. This comprised a review of the following publications, data and datasets:

- Environmental Protection Agency (EPA) (on-line map-viewer including the Appropriate Assessment Tool);
- 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 records (viewed August 2025)

A habitat survey was conducted by ecologists on 16/07/2025 of Greenhills Park. Habitats observed comprise GA2 - Amenity grassland, BL3 - Buildings and artificial surfaces, WL1 - Hedgerows, GS2 - Dry meadows and grassy verges, BL1 - Stone walls and other stonework, WS1 - Scrub, WD1 - (Mixed) broadleaved woodland, WL2 - Treelines, and WD5 - Scattered trees and parkland.

The project is bisected by the CAMAC_040 sub-basin (IE_EA_09C020500), which forms part of the larger Liffey sub-catchment (Liffey_SC_090), and the Poddle_010 sub-basin (IE_EA_09P030800), which forms part of the Dodder sub-catchment (Dodder_SC_010). Both sub-catchments are situated within the Liffey and Dublin Bay Catchment (ID: 9). The proposed development is located ca. 369 m to the north-west of the Poddle Stream (IE_EA_09P030800), which flows into Dublin Bay (IE_EA_090_0000) approximately 16.4 km (instream distance) to the north-east. The Poddle Stream is located within the area of the Dodder sub-catchment which partially overlaps the proposed development area.



No 100 m NBDC record for Otter (*Lutra lutra*) overlap with the project or is located within 150 m of the project, this is to be expected as the closest stream is located approximately 369 m from the project.

No 100 m NBDC record for Light-bellied Brent Geese (*Branta bernicla hrota*) overlap with or are located within 500 m of the project. No Light-bellied Brent Geese were observed during the breeding bird survey conducted by ecologists on 16/07/2025.

There were no records of alien invasive species documented within the proposed project site boundaries.



3. SCREENING FOR APPROPRIATE ASSESSMENT

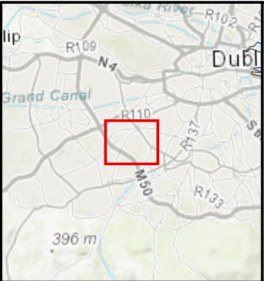
3.1 Introduction

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.

NOTE: It is to be noted that SuDs that have been considered as part of the proposed development are not included within the design to avoid or reduce any potential harmful effects to any European Sites but are included for alignment with county and regional development policies. This screening for Appropriate Assessment does not take SuDS into consideration in determining whether the proposed development could result in likely significant effects on European Sites.

The SuDs system used will facilitate percolation to ground via a swale.

See Figure 3-1 for Site Location.



Legend

- 3G Pitch
- Pathway
- Pavillion
- Townlands
- Proposed Path Realignment
- Rivers
- Path to be Removed

TITLE:
Site Location and Context Map

PROJECT:
Environmental Consultancy Services for 3G Pitch
in Greenhills Park, Co. Dublin

FIGURE NO: 3.1

CLIENT: South Dublin County Council

SCALE: 1:10,000 **REVISION:** 0

DATE: 11/09/2025 **PAGE SIZE:** A3



3.2 Identification of European Sites within the Zone of Influence of the Proposed Project

The OPR (2021) AA Screening practice note states that the Zone of Influence (Zoi) must be established on a case-by-case basis using the Source-Pathway-Receptor model.

The dominant ecological pathways to consider are:

- Direct physical interactions or changes to the local environment;
- Air dispersal (noise, dust, odour emissions etc.);
- Hydrological interactions; and
- Dispersal patterns of mobile species.

As such European sites for consideration are any which could be:

- hydrologically connected to the proposed project;
- designated for species which could use the habitats impacted by the proposed project (i.e. grass verge) and which are in the foraging / commuting range of the project;
- are within a distance of the proposed project such that with potential impacts from habitat loss, noise, lighting, invasive species and dust.

In particular, 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)⁴.
- The Institute of Air Quality Management (Holman et al, 2024)⁵ states that for sensitive ecological receptors, sensitivity to dust is 'High' up to 20 m from the source and reduces to 'Medium' over 50m 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 Zoi for dust is adopted given the small scale of the proposed project.
- For potential for impacts on surface waters, regard is had to IFI (2020) guidelines⁶ 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".
- For groundwater dependant terrestrial ecosystems (GWDTE), regard is had to SEPA guidelines⁷ which prescribes a potential hydrogeological effect zone of 250 m from ground works.

⁴ 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

⁵ Holman et al (2024). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.

⁶ 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.

⁷ 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.



- The potential disturbance zone for marine mammals is taken as 500 m having regard DEAHG (2014) 'Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters'. However, the proposed development works are located beyond a 500 m distance from the coast and as such there is no marine environment within the Zol.
- The NRA (2008) Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes notes a 150 m potential disturbance zone for otter for breeding holts and 20m for non-breeding active holts. As such the study area included the proposed development site plus a 150m buffer to assess habitat suitability for otter and potential association with an SAC population.
- The potential disturbance zone for birds beyond the footprint of the proposed development was considered having regard to Cutts et al (2013)⁸ and was defined as 500 m.

Based upon the above Zol, there are no European sites within the Zone of Influence of the proposed project.

For SACs, consideration was given to existing records for qualifying features in the locality of the proposed development and an assessment of the potential for mobile qualifying features of SACs to use the lands within the disturbance and impact Zols. The habitats within the zone of impact of the proposed development include Buildings (110), Other Artificial Surfaces (130), Amenity Grassland (520) and Ways (120) with interspersed areas of Wet Grassland (540), Scrub (450), Broadleaved Forest and Woodland (440) and Hedgerows (460). The surrounding environment comprises Buildings, Other Artificial Surfaces, Amenity Grassland and Ways with sporadic areas of Hedgerows, Wet Grassland, Dry Grassland (530) and Scrub. These habitats and their urban context make them unsuitable to support any qualifying features associated with any SAC.

The closest SPA is located 8.2 km from the project. In terms of birds there are no SPAs within the 500 m potential disturbance zone for birds. There is also no S-P-R connectivity for significant effects on the supporting/wetland habitat of SPAs. However, in order to assess potential connectivity between the proposed development and mobile special conservation interests of SPAs, 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 15km of the Project, having regard to the conservation objective backing documents for each SPA.

The following SPAs are located within 15 km of the Project: Wicklow Mountains SPA (IE0004040) (ca. 8.2 km), South Dublin Bay and River Tolka Estuary SPA (IE0004024) (ca. 8.8 km), North Bull Island SPA (IE0004006) (ca. 11.8 km) and North-west Irish Sea SPA (IE0004236) (ca. 13.1 km).

- Wicklow Mountains SPA (IE0004040): This SPA is located ca. 8.2 km from the project. The birds associated with this SPA, Merlin and Peregrine, have relatively small core foraging ranges of 5km and 2km respectively (SNH, 2016⁹), 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.
- South Dublin Bay and River Tolka Estuary SPA (IE0004024): This SPA is located ca. 8.8 km from the project. The project 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. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.

⁸ 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.

⁹ Scottish Natural Heritage (2016) Guidance on Assessing Connectivity with Special Protection Areas (SPAs)



- North Bull Island SPA (IE0004006): This SPA is located ca. 11.8 km from the project. This SPA is located outside of the core foraging range of all avian SCIs with the exception of Black-headed Gull and Light-bellied Brent Goose. This SPA is considered further in terms of potential S-P-R connectivity and potential for significant effects in Table 3-1.
- North-west Irish Sea SPA (IE0004236): This SPA is located ca. 13.1 km from the project. The project is located within the core foraging range of several avian SCIs, including Tern species, Gull species, Cormorant and Manx Shearwater (Nature Scot, 2023¹⁰). However, the project contains sub-optimal habitat for these predominantly marine SCIs. Therefore, there is no S-P-R connectivity for significant effects on North-west Irish Sea SPA and listed SCIs.

Based on the above, the following European sites are considered further in terms of potential S-P-R connectivity and potential for significant effects (see Table 3-1):

¹⁰ 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



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	8.8	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Sanderling (<i>Calidris alba</i>) [A144]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Roseate Tern (<i>Sterna dougallii</i>) [A192]</p> <p>Common Tern (<i>Sterna hirundo</i>) [A193]</p> <p>Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p> <p>Wetland and Waterbirds [A999]</p>	<p>The SPA is located outside of the ZOI of the Project 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 ca. 8.8 km from the Project. The project is located outside of the core foraging range of all avian SCIs except for Black-headed Gull, Tern species 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, 2023¹²). The project and 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, 2023¹¹). Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The grassland within 500 m of the project is built environment and disturbed, amenity grassland and is sub-optimal. The proposed development is an existing playing pitch and the There will be no significant effects on SCI Black-headed Gull.</p>	No

¹¹ 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 ¹²). Theoretically, the Project 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. Amenity grassland is located within the 500 m disturbance zone of the project. However, there are no records of Light-bellied Brent Goose within 500 m of the project and improved grassland is common in the greater landscape. There will be no significant effects on SCI Light-bellied Brent Goose.	
(004063)	North Bull Island SPA	11.8 km	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Pintail (<i>Anas acuta</i>) [A054] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149]	The SPA is located outside of the ZoI of the Project and as such there is no potential for direct impacts on the SPA. However, consideration is given to potential for landscape/ecological connectivity. This SPA is located approximately 11.8 km from the Project. The project is located outside of the core foraging range of all avian SCIs with the exceptions of Light-bellied Brent Goose and Black-headed Gull. The core foraging range of Light-bellied Brent Goose is assumed to be ca. 15 km based on the data provided in (SNH, 2016 ¹³). Theoretically, the Project and 500 m disturbance zone overlap with the core foraging ranges of these SCIs associated with the	No

¹² 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
			Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Shoveler (<i>Spatula clypeata</i>) [A857] Wetland and Waterbirds [A999]	<p>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. Amenity grassland is located within the 500 m disturbance zone of the project. However, there are no records of Light-bellied Brent Goose within 500 m of the project and improved grassland is common in the greater landscape. There will be no significant effects on SCI Light-bellied Brent Goose.</p> <p>In relation to Black-headed Gull, Birdwatch Ireland indicates that this species forages on insects within arable fields in coastal and inland habitats. The grassland within 500 m of the project is built environment and disturbed, amenity grassland and is sub-optimal. Although five Black-headed Gulls were observed to be foraging during the breeding bird survey conducted on 16/07/2025, these birds are foraging generalists, and more valuable habitat is present within the wider landscape. There will be no significant effects on SCI Black-headed Gull.</p>	



3.3 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.

3.4 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 3.1 - 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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