



**SIMON CLEAR & ASSOCIATES  
PLANNING AND DEVELOPMENT  
CONSULTANTS**

**Screening Statement for Appropriate Assessment**

**Proposed Mixed-Use Development**

**Including**

**Strategic Housing Development**

**Park Shopping Centre & 42-45 Prussia Street**

**Dublin 7**

**Applicant: The Park Shopping Centre Limited**

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## **1. Introduction**

Special Areas of Conservation (SAC), designated under the EU Habitats Directive and Special Protection Areas (SPA), designated under the EU Birds Directive are collectively referred to as Natura 2000 sites (or European sites). The conservation objectives for these sites are derived from a combination of qualifying interests including the presence of Annex I habitats and Annex II species listed in the Habitats Directive and Annex I birds listed in the Birds Directive.

Part of the statutory protection measures under Articles 6(3) and 6(4) of the Habitats Directive includes the consideration of potential impacts of a plan or project, either alone or in combination with other plans and projects, on the conservation objectives of Natura 2000 sites through an Appropriate Assessment (AA) process. For the purposes of the application for permission in respect of the proposed project, the requirements of Article 6(3) have been transposed into Irish law by Part XAB of the Planning and Development Act 2000, as amended.

This report provides information on and assesses the potential for the proposed development to significantly affect Natura 2000 sites. The information can be used by the competent authority, An Bord Pleanála, in carrying out its statutory obligations under European and national legislation.

The report was prepared by Darran Quaile BA Mod. Environmental Science, MSc Biodiversity and Land Use Planning.

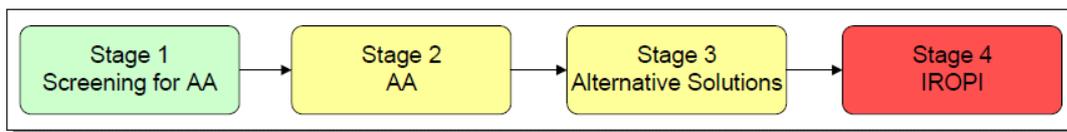
## **2. Methodology**

This Screening Statement for Appropriate Assessment was prepared with regard to the following guidance documents:

- European Commission, 2001. *Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC*. Office for Official Publications of the European Communities, Brussels;

- European Commission, 2000a. *Communication from the Commission on the Precautionary Principle*. Office for Official Publications of the European Communities, Luxembourg;
- European Commission, 2018. *Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (Draft)*. Office for Official Publications of the European Communities, Luxembourg;
- European Commission 2000b. *Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*;
- European Commission, 2007. *Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission*;
- DoEHLG, 2010a. *Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities*. Department of the Environment, Heritage and Local Government, Dublin;
- DoEHLG, 2010b. Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive – Guidance for Planning Authorities;
- European Commission, 2013. *Interpretation Manual of European Union Habitats. Version EUR 28. European Commission*;
- ABP, 2013. *Applications for approval for Local Authority Developments made to An Bord Pleanála under 177AE of the Planning and Development Act, 2000, as amended (Appropriate Assessment): Guidelines for Local Authorities*. An Bord Pleanála, Dublin;
- *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*
- *Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*

The guidance promotes a four-stage process to complete the AA, and outlines the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.



The stages are as follows:

Stage One: Screening — the process which identifies any appreciable impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

Stage Two: Appropriate assessment — the consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site’s structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.

Stage Three: Assessment of alternative solutions: The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain — an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed (it is important to note that this guidance does not deal with the assessment of imperative reasons of overriding public interest).

## **2.1 Desktop Study**

A desktop review facilitates the identification of the baseline ecological conditions and key ecological issues relating to Natura 2000 sites and facilitates an evaluation assessment of potential in-combination impacts. The sources of information and relevant documentation utilised are as follows:

- National Parks & Wildlife Service (NPWS) - [www.npws.ie](http://www.npws.ie) including qualifying interests and conservation objectives for Natura 2000 sites.

- Environmental Protection Agency (EPA) – [www.epa.ie](http://www.epa.ie)
- BirdWatch Ireland - <http://www.birdwatchireland.ie/>
- National Biodiversity Data Centre – [www.biodiversityireland.ie](http://www.biodiversityireland.ie)
- Information on the status of EU protected habitats and species in Ireland (National Parks & Wildlife Service, 2019)

### **3 Stage 1 Screening**

The first step is to establish whether, in relation to a particular plan or project, appropriate assessment is required. Its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project, alone or in combination with other plans or projects, could have significant effects on a Natura 2000 site in view of the site's conservation objectives.

Screening for AA involves the following:

- Description of the project and its relevance to the management of a Natura site;
- Identification of Natura 2000 sites potentially affected;
- Identification and description of individual and cumulative impacts likely to result;
- Assessment of the significance of the impacts identified on site integrity.

#### **3.1 Site Description**

The subject site, which has an area of c. 1.2 ha.. is a brownfield site located between Prussia Street and the TU Dublin Grangegorman Campus in the inner-city area of Dublin. The site currently accommodates a 1-2 storey shopping centre dating from the 1980s. Much of the site accommodates surface car parking.



**Figure 1: Aerial Context Map**



**Figure 2: View of site from Prussia Street**



**Figure 3: Area of amenity grassland to east of site**

The principal habitat on the site can be classified as ‘Buildings and artificial surfaces’ (BL3) in accordance with Fossitt’s *Guide to Habitats*. There are a small number of trees scattered throughout the car park. To the east is an area of ‘Amenity Grassland’ (GA2) and tarmacadam footpath connecting the site with the Grangegorman Campus.

There are no watercourses within the subject lands. The nearest water features recorded on ‘EPA maps’ are the river Liffey located c.1km to the south and the Royal Canal located c. 1.2km to the north.

### ***3.2 Description of Proposed Development***

The proposed development shall comprise the following: -

(1) Demolition of the existing Park Shopping Centre and nos. 42-45 Prussia Street, Dublin7 and creation of portal openings in the former boundary wall (Protected Structure);

(2) Construction of a new mixed use District Centre, Student Residential Housing and Build-to-Rent Housing development in 2 buildings, a South Building and a North Building,

separated by a new pedestrian and bicycle street connecting Prussia Street with the emerging Grangegorman SDZ campus. The buildings will range in height from 3-5 storeys on Prussia Street to 6-storeys (South building) and 8-storeys (North Building) towards to GDA campus.

(3) District Centre development accommodating: -

- Part-licensed supermarket, 11 no. retail/non-retail service units and 2 no. licensed café/restaurant units at ground floor;
- Two vehicular entrances from Prussia Street to provide access for deliveries and services (South entrance) and to provide access to undercroft parking and van deliveries (North entrance);
- Standing areas for deliveries and waste collection in designated service yards (South Building) and for car parking for 111 no. cars, light van deliveries and bicycle parking (North Building);
- All associated ancillary facilities, landscaping and boundary treatments including acoustic attenuation measures where required.

(4) Student residential accommodation overhead the District Centre accommodating 11 no. student houses comprising 143 no. apartments (including 28 no. studios), with a total of 584 bedspaces (556 bedrooms) and associated balconies;

- The North Building student residential accommodation has reception and student amenities (conciierge, café, lounge areas) at ground, mezzanine and first floor levels, with access to all levels overhead and a first floor level podium garden from which student apartments and student amenity areas (study centre, a recreation centre and laundry) are accessible; 2 no. amenity terraces with pergola structures at fourth floor.
- The South Building student residential accommodation has ground floor level foyer with access to all levels, staff rooms, fitness centre at ground and mezzanine levels and a first floor level podium garden from which student apartments are directly accessible.

(5) Build-to-rent residential accommodation overhead the supermarket with lift and stair access from Prussia Street, comprising 29 no. apartments with balconies (28 no. 2 bedroom and 1 no. 3 bedroom units) and 3 no. 2 bedroom townhouses, laundry room, lounge/games room, bicycle store, waste store and podium garden with conservatory allotments.

6) The proposed new street will connect to the Grangegorman SDZ campus via a portal connection through a former boundary wall

7) The development includes art display along the new street, landscaping, boundary treatments, signage, plant and substations, and all associated site works and services.

### *3.2.2 Foul & Surface Water Drainage*

It is proposed to discharge foul water from the proposed development to the existing combined sewer on Prussia Street. Suitable grease traps will be installed from wash down and food preparation areas prior to discharge into the on-site foul system.

Storm water from the proposed development has been designed in accordance with the GDSDS and ensures that Best Management Practice has been incorporated into the design. The existing development currently comprises of impermeable hard standing areas (existing buildings and surface car parking). The proposed surface water measures are aimed at improving the general surface water management of the site, by introducing interceptors, attenuation measures and by restricting the ultimate discharge off site.

Storm water from the roof areas of the proposed building units will be directed via rain water pipes into an on-site reticulation system. The outflow from this system will be connected into the surface water drainage network collecting run-off from the car parking areas and will be discharged directly into an attenuation system.

Storm water from all car park areas and access roads will be collected via a series of on-site gullies and drain into a separate system of below ground gravity storm water sewers. Prior to discharging into the proposed attenuation system the storm water from the car park and access roads will be directed through appropriately sized petrol interceptor(s).

It is proposed to restrict the outflow from the subject site by installing a Hydrobrake facility. It is proposed to ultimately discharge surface water from the proposed development via gravity sewer networks and connect into the combined sewer on Prussia Street.

Water pollution will be minimised by the implementation of good construction practices, as outlined in *Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors – C532 CIRIA Report (Masters-Williams et al, 2001)*. Such practices will include adequate bunding for oil containers, wheel washers and dust suppression on site roads, and regular plant maintenance.

Whilst the implementation of such measures during construction will assist in minimising impacts on the local environment, the implementation of these measures has not been taken into consideration in this screening report when reaching a conclusion as to the likely impact of the development on Natura 2000 sites.

Full details of the proposed development can be found in the plans and particulars submitted with the application.

### **3.3 Description of Natura 2000 Sites**

Screening requires that European sites within the likely Zone of Influence (ZoI) are identified. A distance of 15km is currently recommended in the case of plans, and derives from UK guidance. For projects, the distance may be much less than 15km and must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects.

Natura 2000 sites are only at risk from significant effects where a source-pathway-receptor link exists between a proposed development and a Natura 2000 site(s). This can take the form of a direct impact (e.g. where the proposed development and/or associated construction works are located within the boundary of the Natura 2000 site(s) or an indirect impact where impacts outside of the Natura 2000 site(s) affect ecological receptors within (e.g. impacts to water quality which can affect riparian habitats at a distance from the impact source). Considering the Natura 2000 sites present in the region, their Qualifying Interests (QIs) and conservation objectives, and any potential impact pathways that could link those sites to the proposed development area, a distance of 15 km was considered appropriate to encompass all Natura 2000 sites potentially within the Zone of Influence of the proposed

development. Thus, any appreciable direct, indirect or cumulative impacts which could arise from the proposed development in relation to the designated sites within this zone were considered.

The proposed development is not located within any Natura 2000 site. A potential source-pathway-receptor link has been identified between the source (the proposed development) and the receptor (Dublin Bay/ Liffey Estuary Lower) via a potential pathway (discharge of surface water run-off and wastewater).

Four of the Natura 2000 sites listed in Table 1 are located within Dublin Bay (South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and the South Dublin Bay & River Tolka Estuary SPA). Qualifying species and habitats within these sites could potentially be impacted via a reduction in water quality. Wastewater discharging from the proposed development will be conveyed to the Ringsend Wastewater Treatment Plant (WWTP) for treatment prior to discharging into the Dublin Bay/ Liffey Estuary Lower. Surface waters generated during construction could potentially carry silt, hydrocarbons or other contaminants into either the local combined sewer network or the local surface water sewer network which ultimately discharge to Dublin Bay. The nearest watercourse is the River Liffey, located 1km south of the proposed development site.

Given the scale of the proposed development, the lack of a hydrological connection, the dilution provided in the estuarine/marine environment and the distances involved, no potential impact on other designated sites has been identified.

Natura 2000 sites within a 15 km radius of the proposed development site are listed below in Table 1. Potential pathways between the proposed development site and the Natura 2000 sites are also considered.

**Table 1: Natura 2000 sites and location relative to proposed project**

Site Name and Code	Distance and Potential Pathways
<b>Special Areas of Conservation</b>	
South Dublin Bay	5.5km south-east of the project site. Although improbable, a potential impact on this SAC has been identified from surface water run-off during construction and discharges to wastewater during operation via the Ringsend WWTP to the waters of Dublin Bay/ Liffey Estuary Lower.
North Dublin Bay	7km east of the project site. Although improbable, a potential impact on this SAC has been identified from surface water run-off during construction and discharges

	to wastewater during operation via the Ringsend WWTP to the waters of Dublin Bay/ Liffey Estuary Lower.
Baldoyle Bay	11.6km north-east of the project site. No possibility of significant effects.
Glenasmole Valley	12.3km south of the subject site. No possibility of significant effects.
Howth Head	12.6km north-east of the project site. No possibility of significant effects.
Wicklow Mountains	13.1km south of the subject site. No possibility of significant effects.
Rockabill to Dalkey Island	13.2km east of the project site. No possibility of significant effects.
Malahide Estuary	13.4km north-east of the project site. No possibility of significant effects.
Rye Water Valley / Carton	13.6km west of the project site. No possibility of significant effects.
<b>Special Protection Areas</b>	
South Dublin Bay & River Tolka	3.9km east of the project site. Although improbable, a potential impact on this SAC has been identified from surface water run-off during construction and discharges to wastewater during operation via the Ringsend WWTP to the waters of Dublin Bay/ Liffey Estuary Lower.
North Bull Island	7km east of the project site. Although improbable, a potential impact on this SAC has been identified from surface water run-off during construction and discharges to wastewater during operation via the Ringsend WWTP to the waters of Dublin Bay/ Liffey Estuary Lower.
Baldoyle Bay	11.6km north-east of the project site. No possibility of significant effects.
Malahide Estuary	13.4km north-east of the project site. No possibility of significant effects.

### 3.4 *Qualifying Interests and Conservation Objectives*

The EU Habitats Directive contains a list of habitats (Annex I) and species (Annex II) for which SACs must be established by Member States. Similarly, the EU Birds Directive contains lists of important bird species (Annex I) and other migratory bird species for which SPAs must be established. Those that are known to occur at a site are referred to as ‘qualifying interests’ and are listed in the Natura 2000 forms which are lodged with the EU Commission by each Member State. A ‘qualifying interest’ is one of the factors (such as the species or habitat that is present) for which the site merits designation.

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. Favourable conservation status of a habitat is achieved when its natural range, and area it covers within that range, is stable or increasing, and the ecological factors that 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 favourable conservation status of a species is achieved when population data on the species concerned indicate that it is maintaining itself, and the natural range of the species is neither being reduced or 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

The South Dublin Bay SAC and North Dublin Bay SAC are of conservation significance for the occurrence of good examples of habitats that are listed on Annex I of the E.U. Habitats Directive. North Bull Island SPA and the South Dublin Bay & River Tolka Estuary SPA are recognised under the E.U. Birds Directive as being of international importance by regularly supporting in excess of 20,000 wintering waterfowl, including Annex I listed species under the E.U. Birds Directive.

Tables 2(a) to 2(d) outline the Qualifying Interests, Conservation Objectives, Conservation Status and threats of medium and high importance to the species or habitats based on information derived from Article 12 and Article 17 Reports on the status of protected habitats and species in Ireland.

**Table 2(a): South Dublin Bay SAC**

<b>Qualifying Interests</b>	<b>Conservation Objective</b>	<b>Conservation Status / Population Trend</b>	<b>Threats to Habitat / Species (see Table 3)</b>
Mudflats and sandflats not covered by seawater at low tide [1140]	Maintain	Deteriorating	- F20 - A28 - G16
Annual vegetation of drift lines [1210]	Maintain/Restore	Deteriorating	- F08 - C01 - F01 - F06 - F07
Salicornia and other annuals colonising mud and sand [1310]	Maintain/Restore	Stable	- I02 - A09
Embryonic shifting dunes [2110]	Maintain/Restore	Stable	- F07 - F08 - L01 - C01 - E03 - F01 - F06 - L02

Restore = Restore favourable conservation condition, Maintain = Maintain favourable conservation condition

**Table 2(b): North Dublin Bay SAC**

<b>Qualifying Interests</b>	<b>Conservation Objective</b>	<b>Conservation Status / Population Trend</b>	<b>Threats to Habitat / Species (see Table 3)</b>
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Mudflats and sandflats not covered by seawater at low tide [1140]	Maintain	Deteriorating	- F20 - A28 - G16
Annual vegetation of drift lines [1210]	Restore	Deteriorating	- F08 - C01 - F01 - F06 - F07
Salicornia and other annuals colonising mud and sand [1310]	Restore	Stable	- I02 - A09
Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]	Maintain	Deteriorating	- A09 - F07 - A33 - A36 - F08 - I02
Mediterranean salt meadows (Juncetalia maritimi) [1410]	Maintain	Deteriorating	- A09 - A33 - A36 - A10
Embryonic shifting dunes [2110]	Restore	Stable	- F07 - F08 - L01 - C01 - E03 - F01 - F06 - L02
Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]	Restore	Stable	- F07 - F08 - L01 - E01 - E03 - F01 - F06 - I02
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	Restore	Deteriorating	- A10 - I02 - A02 - A09 - F07 - F08 - L02
Humid dune slacks [2190]	Restore	Deteriorating	- A19 - A31 - F07 - I02 - L02
<i>Petalophyllum ralfsii</i> (Petalwort) [1395]	Maintain	Stable	No threats were identified as being of

			high or medium importance nationally
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Restore = Restore favourable conservation condition, Maintain = Maintain favourable conservation condition

**Table 2(c): South Dublin Bay & River Tolka SPA**

Qualifying Interests	Conservation Objective	Conservation Status / Population Trend	Threats to Habitat / Species
Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> )	Maintain	Increasing	- Outdoor sports and leisure activities, recreational activities - Utility and service lines - Renewable abiotic energy use - Modification of cultivation practices
Oystercatcher ( <i>Haematopus ostralegus</i> )	Maintain	Stable	- Fishing and harvesting aquatic resources
Ringed Plover ( <i>Charadrius hiaticula</i> )	Maintain	Stable	- Outdoor sports and leisure activities, recreational activities - Marine and freshwater aquaculture - Changes in abiotic conditions
Grey Plover ( <i>Pluvialis squatarola</i> )	Maintain	Decreasing	- Outdoor sports and leisure activities, recreational activities - Fishing and harvesting aquatic resources - Marine and freshwater aquaculture - Changes in abiotic conditions
Knot ( <i>Calidris canutus</i> )	Maintain	Increasing	- Outdoor sports and leisure activities, recreational activities - Fishing and harvesting aquatic resources - Marine and freshwater aquaculture - Changes in abiotic conditions
Sanderling ( <i>Calidris alba</i> )	Maintain	Increasing	- Outdoor sports and leisure activities, recreational activities - Marine and freshwater aquaculture - Changes in abiotic conditions
Dunlin ( <i>Calidris alpina</i> )	Maintain	Decreasing	- Outdoor sports and leisure activities, recreational activities

			<ul style="list-style-type: none"> <li>- Fishing and harvesting aquatic resources</li> <li>- Marine and freshwater aquaculture</li> <li>-Changes in abiotic conditions</li> <li>- Modification of cultivation practices</li> <li>- Mining and quarrying</li> <li>- Mowing of grassland</li> <li>- Forest planting on open ground</li> <li>- Fertilisation</li> <li>- Fire and fire suppression</li> <li>-Grazing</li> <li>- Interspecific faunal relations</li> </ul>
Bar-tailed Godwit ( <i>Limosa lapponica</i> )	Maintain	Increasing	<ul style="list-style-type: none"> <li>- Marine and freshwater aquaculture</li> <li>-Changes in abiotic conditions</li> </ul>
Redshank ( <i>Tringa totanus</i> )	Maintain	Stable	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>-Changes in abiotic conditions</li> </ul>
Black-headed gull ( <i>Larus ridibundus</i> )	Maintain	Unknown	No threats were identified as being of high or medium importance nationally

Restore = Restore favourable conservation condition, Maintain = Maintain favourable conservation condition

**Table 2(d): North Bull Island SPA**

<b>Qualifying Interests</b>	<b>Conservation Objective</b>	<b>Conservation Status / Population Trend</b>	<b>Threats to Habitat / Species</b>
Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> ) [A674-A]	Maintain	Increasing	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>- Utility and service lines</li> <li>- Renewable abiotic energy use</li> <li>- Modification of cultivation practices</li> </ul>
Oystercatcher ( <i>Haematopus ostralegus</i> ) [A130]	Maintain	Stable	<ul style="list-style-type: none"> <li>- Fishing and harvesting aquatic resources</li> </ul>
Grey Plover ( <i>Pluvialis squatarola</i> )	Maintain	Decreasing	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>- Fishing and harvesting aquatic resources</li> <li>- Marine and freshwater aquaculture</li> </ul>

			-Changes in abiotic conditions
Knot ( <i>Calidris canutus</i> )	Maintain	Increasing	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>- Fishing and harvesting aquatic resources</li> <li>- Marine and freshwater aquaculture</li> <li>-Changes in abiotic conditions</li> </ul>
Sanderling ( <i>Calidris alba</i> )	Maintain	Increasing	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>- Marine and freshwater aquaculture</li> <li>-Changes in abiotic conditions</li> </ul>
Dunlin ( <i>Calidris alpina</i> )	Maintain	Decreasing	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>- Fishing and harvesting aquatic resources</li> <li>- Marine and freshwater aquaculture</li> <li>-Changes in abiotic conditions</li> <li>- Modification of cultivation practices</li> <li>- Mining and quarrying</li> <li>- mowing of grassland</li> <li>-Forest planting on open ground</li> <li>- Fertilisation</li> <li>- Fire and fire suppression</li> <li>-Grazing</li> <li>- Interspecific faunal relations</li> </ul>
Bar-tailed Godwit ( <i>Limosa lapponica</i> )	Maintain	Increasing	<ul style="list-style-type: none"> <li>- Marine and freshwater aquaculture</li> <li>- Changes in abiotic conditions</li> </ul>
Redshank ( <i>Tringa totanus</i> )	Maintain	Stable	<ul style="list-style-type: none"> <li>- Outdoor sports and leisure activities, recreational activities</li> <li>- Changes in abiotic conditions</li> </ul>
Black-headed gull ( <i>Larus ridibundus</i> )	Maintain	Unknown	No threats were identified as being of high or medium importance nationally

Shelduck ( <i>Tadorna tadorna</i> )	Maintain	Increasing	Unreported
Teal ( <i>Anas crecca</i> )	Maintain	Stable	Unreported
Shoveler ( <i>Anas clypeata</i> )	Maintain	Increasing	- Outdoor sports and leisure activities, recreational activities - Hunting & collecting of wild animals
Golden plover ( <i>Pluvialis apicaria</i> )	Maintain	Decreasing	- Renewable abiotic energy use
Black-tailed Godwit ( <i>Limosa limosa</i> )	Maintain	Increasing	- Marine & freshwater aquaculture
Curlew ( <i>Numenius arquata</i> )	Maintain	Decreasing	- Outdoor sports and leisure activities, recreational activities - Renewable abiotic energy use
Turnstone ( <i>Arenaria interpres</i> )	Maintain	Fluctuating	- Outdoor sports and leisure activities,

Restore = Restore favourable conservation condition, Maintain = Maintain favourable conservation condition

### 3.5 Assessment of Likely Significant Effects

As part of the assessment the potential for impacts associated with the development were reviewed as outlined below:

#### *Threats to Qualifying Interests*

Table 2 identifies the most significant threats to the conservation status of the qualifying interests of the Natura 2000 sites. The next step is to consider whether the proposed development is likely to give rise to such threats (Table 3). In making these judgements, each Natura 2000 site is examined for a potential source-pathway-receptor link.

**Table 3(a): Relationship between proposed development and key threats to the SACs**

Code	Threat	Risk of threat arising from development of Project
F20	Residential or recreational activities and structures generating marine pollution (excl. marine macro- and micro- particulate pollution (H))	No risk
A28	Agricultural activities generating marine pollution (H)	No risk
G16	Marine aquaculture generating marine pollution (H)	No risk
I02	Other invasive alien species (other than species of Union concern) (M)	No risk

A09	Intensive grazing or overgrazing by livestock (M)	No risk
F07	Sports, tourism and leisure activities (H)	No risk
A33	Modification of hydrological flow or physical alternation of water bodies for agriculture (excluding development and operation of dams) (M)	No risk
A36	Agriculture activities not referred to above (M)	No risk
F08	Modification of coastline, estuary and coastal conditions for development, use and protection of residential, commercial, industrial and recreational infrastructure and areas (including sea defence or coast protection works and infrastructures) (M)	No risk
A10	Extensive grazing or undergrazing by livestock (M)	No risk
L01	Abiotic natural processes (e.g. erosion, silting up, drying out, submersion, salinization) (H)	No risk
E01	Roads, paths, railroads and related infrastructure (e.g. bridges, viaducts, tunnels) (M)	No risk
E03	(Shipping lanes, ferry lanes and anchorage infrastructure e.g. canalisation, dredging) (M)	No risk
F01	Conversion from other land uses to housing, settlement or recreational areas (excluding drainage and modification of coastline, estuary and coastal conditions) (M)	No risk
F06	Development and maintenance of beach areas for tourism and recreation incl. beach nourishment and beach cleaning (M)	No risk
A02	Conversion from one type of agricultural land use to another (excluding drainage and burning) (M)	No risk
L02	Natural succession resulting in species composition change (other than by direct changes of agricultural or forestry practices) (M)	No risk
C01	Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) (M)	No risk
E03	Shipping lanes, ferry lanes and anchorage infrastructure (e.g. canalisation, dredging) (M)	No risk
A19	Application of natural fertilisers on agricultural land (M)	No risk
A31	Drainage for use as agricultural land (M)	No risk
N03	Increases or changes in precipitation due to climate change (M)	No risk
N04	Sea-level and wave exposure changes due to climate change (M)	No risk
A11	Burning for Agriculture (H)	No risk
B01	Conversion to forest from other land uses, or afforestation (excluding drainage) (M)	No risk
D01	Wind, wave and tidal power, including infrastructure (M)	No risk
N01	Temperature changes (e.g. rise of temperature & extremes) due to climate change (M)	No risk
N02	Droughts and decreases in precipitation due to climate change (M)	No risk
F09	Deposition and treatment of waste/garbage from household/recreational facilities (M)	No risk
G01	Marine fishing and shellfish harvesting (professional, recreational) causing reduction of species/prey populations and disturbance of species (H)	No risk
G03	Marine fish and shellfish harvesting (professional, recreational) activities causing physical loss and disturbance of seafloor habitats (H)	No risk
C09	Geotechnical surveying (M)	No risk

**Table 3(b): Relationship between proposed development and key threats to SPAs**

<b>Threat</b>	<b>Risk of threat arising from Construction or Operation of Project</b>
Outdoor sports and leisure activities, recreational activities	No risk
Fertilisation	No risk
Utility and Service lines	No risk
Renewable abiotic energy use	No risk
Modification of cultivation practices	No risk
Marine and Freshwater Aquaculture	No risk
Fishing and harvesting aquatic resources	No risk
Changes in abiotic conditions	No risk
Grazing	No risk
Fire and fire suppression	No risk
Forest planting on open ground	No risk
Mining and quarrying	No risk
Mowing of grassland	No risk
Interspecific faunal relations	No risk

It is concluded that the proposed development will not give rise to the main threats/pressures on the qualifying interests of the Natura 2000 sites, as identified in the Article 12 and Article 17 reports on the status of protected habitats and species in Ireland.

#### ***Loss of habitat***

The site is not located or close to a Natura 2000 site. The habitats recorded within the site do not correspond to habitats listed on Annex I of the Habitats Directive or to qualifying habitats for the South Dublin Bay SAC and North Dublin Bay SAC. The habitats recorded onsite are of low ecological value and are common in the surrounding landscape.

No potential for habitat fragmentation has been identified. The proposed development will not result in any loss of habitat within Natura 2000 sites.

#### ***Impacts from noise and disturbance***

The South Dublin Bay & River Tolka Estuary SPA and North Bull Island SPA are located 3.9km and 7km from the site. The habitats within the proposed development area are not considered of value for qualifying species of these Natura 2000 sites. The wintering birds listed as qualifying interests for the North Bull Island SPA and the South Dublin Bay & River Tolka Estuary SPA are strongly associated with estuarine shoreline areas or wetlands.

The proposed development site is dominated by buildings and artificial surfaces, which are not suitable as foraging grounds for these species. It follows that these species do not rely

on the food resources available within the footprint of the proposed development. No impact on qualifying species is predicted to occur.

### ***Impacts on Water Quality***

Potential impacts on aquatic habitats which can arise from this type of development include increased silt levels in surface water run-off and inadvertent spillages of hydrocarbons from fuel and hydraulic fluid.

It is noted however that the proposed development site is c. 1km from the River Liffey at its closest point. The risk of significant silt levels being deposited within nearby watercourses during the construction phase of the development is considered negligible. Furthermore, due to the dilution provided in the estuarine environment and naturally fluctuating levels of silt, impacts are only likely to arise from extremely severe levels of siltation. Therefore, given the location of the works, the distance of the proposed development from the estuarine environment and the dilution provided in the estuarine/marine environment, any impacts on water quality due to elevated silt levels during construction will be negligible.

Inadvertent spillages of hydrocarbons during construction could introduce toxic chemicals into the aquatic environment via surface water run-off or groundwater contamination and have a direct toxicological impact on habitats and fauna. Given the distance from estuarine/marine environment, the presence of buffers, the robust nature of qualifying habitats and the dilution provided in the estuarine/marine environment any impacts on water quality due to such spills during construction will be negligible.

Once operational surface waters from the proposed development will pass through SUDs systems including attenuation tanks and hydrocarbon interceptors prior to discharge thus reducing the likelihood of suspended solids or hydrocarbons entering the water system. Even in the absence of such measures, the risk of significant impacts on Natura 2000 sites would be negligible.

The construction and operational stage of the proposed development will not impact surface water quality nor interfere with the conservation objectives of the South Dublin Bay SAC,

Dublin Bay SAC, North Bull Island SPA and the South Dublin Bay & River Tolka Estuary SPA.

***Potential Increase in the Discharges from Ringsend WWTP***

Once constructed, surface and wastewater from the proposed development will be conveyed for treatment to Ringsend Wastewater Treatment Works. Irish Water noted the following in their correspondence dated April 2020: *Irish Water has reviewed your pre-connection enquiry in relation to a water and wastewater connection at Park Shopping Centre, Prussia Street, Dublin 7. Based upon the details that you have provided with your pre-connection enquiry and on the capacity currently available in the network(s), as assessed by Irish Water, we wish to advise you that, subject to a valid connection agreement being put in place, your proposed connection to the Irish Water network(s) can be facilitated.*

No significant effects from discharge arising from the proposed development are predicted due to the following:

- There was no proven link between WWTP discharges and nutrient enrichment of sediments in Dublin Bay based on analyses of dissolved and particulate Nitrogen signatures (Wilson and Jackson, 2011);
- Enriched water entering Dublin Bay has been shown to rapidly mix and become diluted such that the plume is often indistinguishable from the rest of bay water (O'Higgins and Wilson, 2005); and
- Marine modelling for Ringsend WWTP indicates that discharged effluent is rapidly mixed and dispersed to low levels via tidal mixing within a short distance of the outfall pipe (Dowly & Bedri 2007).
- A commitment by Irish Water to upgrade the plant to meet EU standards and extend the plant to achieve the maximum capacity possible on the existing site. Its current capacity is 1.6 million population equivalent (P.E) and the plan is to raise this by a further 500,000 to 2.1 million P.E. while still producing treated water of the same high quality and dispersing it through a new long sea outfall tunnel under the seabed to a discharge point 9 kilometres.
- In the future, it is intended that wastewater from the Greater Dublin area will be treated at the extended Ringsend Plant as well as at a new plant being planned in North County Dublin.

### ***Cumulative Impacts***

In terms of potential cumulative impacts, the application site adjoins the lands that are being developed in accordance with the Grangegorman SDZ Planning Scheme. An Appropriate Assessment screening of the Planning Scheme was carried out and concluded there was no requirement for a Stage 2 Appropriate Assessment.

### **4. Screening Conclusion**

On the basis of the findings of this Screening Statement for Appropriate Assessment, it is concluded that there is no likelihood of significant effects on Natura 2000 sites arising from the proposed development, either alone or in combination with other plans or projects. It is considered that Stage 2 Appropriate Assessment is not required.

**Darran Quail**

**BA (Mod) Environmental Science**

**MSc Biodiversity and Land Use Planning**

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