PROPOSED MIXED USE LARGE-SCALE RESIDENTIAL DEVELOPMENT AT WHITE HEATHER INDUSTRIAL ESTATE, SOUTH CIRCULAR ROAD, DUBLIN 8

Natura Impact Statement

Green Urban Logistics 3 White Heather Propco Limited

Rev.: 1
Date: 27/11/2025

Project name:	Proposed Mixed Use Large-Scale Residential Development at White Heather Industrial Estate, South Circular Road, Dublin 8	DNV Synergy Environmental Limited T/A DNV 3D Core C, Block 71, The Plaza, Park West Dublin 12, D12F9TN Tel: 01 565 4730
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1 INTRODUCTION

1.1 Background

DNV was commissioned by Green Urban Logistics 3 White Heather Propco Limited to prepare an Appropriate Assessment (AA) Screening Report in relation to a Proposed Development at White Heather Industrial Estate, South Circular Road, Saint James, Dublin 8. The AA Screening Report concluded that a degree of uncertainty exists in whether the Proposed Development could give rise to potentially significant effects on five European sites, namely:

- North Dublin Bay SAC (000206);
- South Dublin Bay SAC (000210);
- North Bull Island SPA (004006);
- South Dublin Bay and Tolka Estuary SPA (004024); and
- North-west Irish Sea SPA (004236).

A Natura Impact Statement (NIS) has therefore been prepared for the Proposed Development. The purpose of this NIS report is to provide information for the relevant competent authority to carry out a Stage 2 AA in respect of the Proposed Development.

1.2 Quality Assurance and Competence

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants. HON, Project Ecologist with DNV, undertook habitat, fauna and flora surveys, and the desktop research for this report, and authored the report. BMcC, Ornithologist and Ecologist with DNV, undertook the Bird Survey for this report.

HON, Project Ecologist with 4 years' experience in consultancy, has a B.A. in Zoology from Trinity College Dublin. Experience in consulting includes the preparation of ecological assessments, most frequently for Stage I and Stage II AA, and Ecological Impact Assessments (EcIA) and Biodiversity Chapters for Environmental Impact Assessment Reports (EIAR), desktop studies, field surveys and data analysis (QGIS). Field survey experience includes terrestrial mammal surveys, ornithology surveys, habitat surveys, marine mammal surveys and aquatic surveys. HON is also a Qualifying member of Chartered Institute of Ecology and Environmental Management (CIEEM).

BMcC, Ecologist and experienced Ornithologist, has 14 years of bird survey experience. BMcC is a longstanding and active member of Birdwatch Ireland and has provided Ornithology survey work for ecological consultancies (e.g., vantage points surveys of gulls, terns, raptors, waders, and wildfowl; hinterland surveys of the above as well as riverine species; and breeding waders and country birds). BMcC is highly experienced with all survey methodologies and with surveying all species groups of Irish birds and migrants.

1.3 Description of Proposed Development

1.3.1 Site Location

The Site is located in Dublin City Centre along the Grand Canal, at White Heather Industrial Estate, South Circular Road, Saint James, Dublin 8. It is immediately bordered by the Grand Canal to the south, and by urban residential housing and infrastructure on all other sides. The location of the Site is presented in Figure 1.

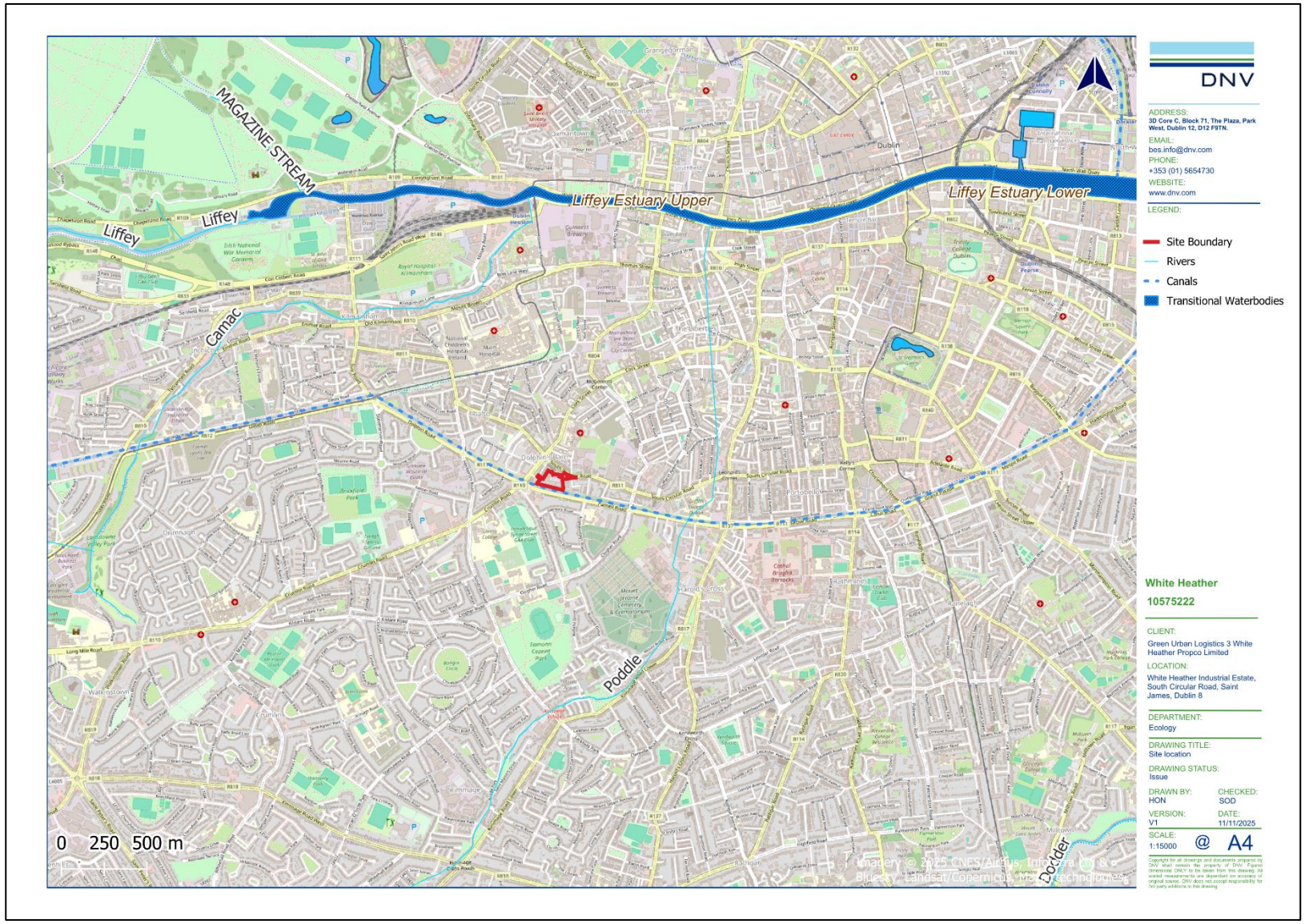

Figure 1. Site location.

1.3.2 Proposed Development Description

The proposed mixed-use Large-Scale Residential Development (LRD) will comprise the demolition of all existing commercial and warehouse buildings and structures on the site, and the construction of 250 no. residential units within six blocks (Blocks 01, 02(A/B), 03(A/B), 04(A/B), and two duplex blocks) ranging in height up to seven storeys. The development will include 12 no. studio apartments, 148 no. one-bedroom apartments, 74 no. two-bedroom apartments, 8 no. one-bedroom duplex units, and 8 no. two-bedroom duplex units.

All residential units will include private balconies or terraces, oriented north, south, east, or west.

The proposal also includes the conversion of the existing residential dwelling at 307/307A South Circular Road to a crèche with an associated external play area. A new kiosk/café and adjoining open space will be provided adjacent to 307/307A South Circular Road, along with car and bicycle parking. The development will provide public open spaces between Blocks 03 and 04, as well as to the north and south of the apartment blocks, the latter overlooking the Grand Canal, together with communal open spaces throughout the scheme. Vehicular, pedestrian, and cyclist access will be provided from the northeast of the site via South Circular Road, with additional pedestrian and cyclist access from the west via St James's Terrace.

The proposal also includes landscaping, public and communal open spaces, and all associated site development works required to facilitate the project. These works include boundary treatments, plant and waste management areas, and other service provisions, including ESB infrastructure.

1.3.3 Description of the Construction Phase

As per the Outline Construction Environmental Management Plan (OCEMP) (DNV, 2025a), the Construction Phase of the Proposed Development will include:

- Excavation of soil and subsoil for the construction of building foundations, drainage and other infrastructure. It is anticipated that there will be no requirement for the excavation of bedrock during the Construction Phase of the Proposed Development;
- Where possible, it is intended to reuse suitable excavated soil and subsoil for landscaping and engineering use. However, where required, surplus materials will require removal offsite in accordance with all statutory legislation;
- The importation of aggregate fill materials will be required for the construction of the Proposed Development (e.g., granular material beneath road pavement, under floor slabs and for drainage and utility bedding/surrounds etc.). There may also be a requirement to import soil for landscaping use;
- There may be a requirement for management of surface water (rainwater) and shallow groundwater, where encountered during groundworks;
- Construction of new foul and mains water connections in accordance with UE Code of Practice for Wastewater Infrastructure (IW-CDS-5030-03), UE's Code of Practice for Water Infrastructure (IW-CDS-5020-03); and
- Construction of new surface water drainage designed in accordance with the principles and objectives of Sustainable Drainage Systems (SuDS), the Greater Dublin Strategic Drainage Study (GDSDS) and the requirements of Dublin City Council.

The layout of the Site is presented in Figure 2.

1.3.3.1 Programme

It is anticipated that the Construction Phase of the Proposed Development will take approximately 24 months to complete.

The programme duration and proposed sequence of construction will be further developed by the Main Contractor (once appointed) in advance of construction works commencing onsite and will be included in the live Construction Environmental Management Plan (CEMP).

1.3.3.2 Working Hours

Normal site working hours will apply to the Construction Phase of the Proposed Development, namely:

- Monday to Friday: 07:00am to 18:00pm;
- Saturday: 08:00am to 14:00pm; and
- No works are permitted on Sundays or Bank Holidays.

No works are envisaged to be carried out on Sundays or Bank Holidays. However, should there be a need to work on Sundays, Bank Holidays or outside the specified normal working hours, a written submission, with compelling reasons for the proposed deviation, seeking authorisation will be made by the Main Contractor to Dublin City Council. The Main Contractor must give the times and dates of the proposed work, and the mitigation measures that are to be used to minimise noise/disturbance.

Any such approval from Dublin City Council may be subject to conditions pertaining to the particular circumstances being set by Dublin City Council. It is noted that any breaches of permitted working hours or permitted extended working hours or developers or subcontractors not carrying out their requirements under this protocol may lead to enforcement action and may also result in the withdrawal of any extension of hours of works for a period that will be at the discretion of Dublin City Council.

1.3.4 Description of the Operational Phase

The Operational Phase will comprise of residential use that is consistent with the neighbouring land use in the area.

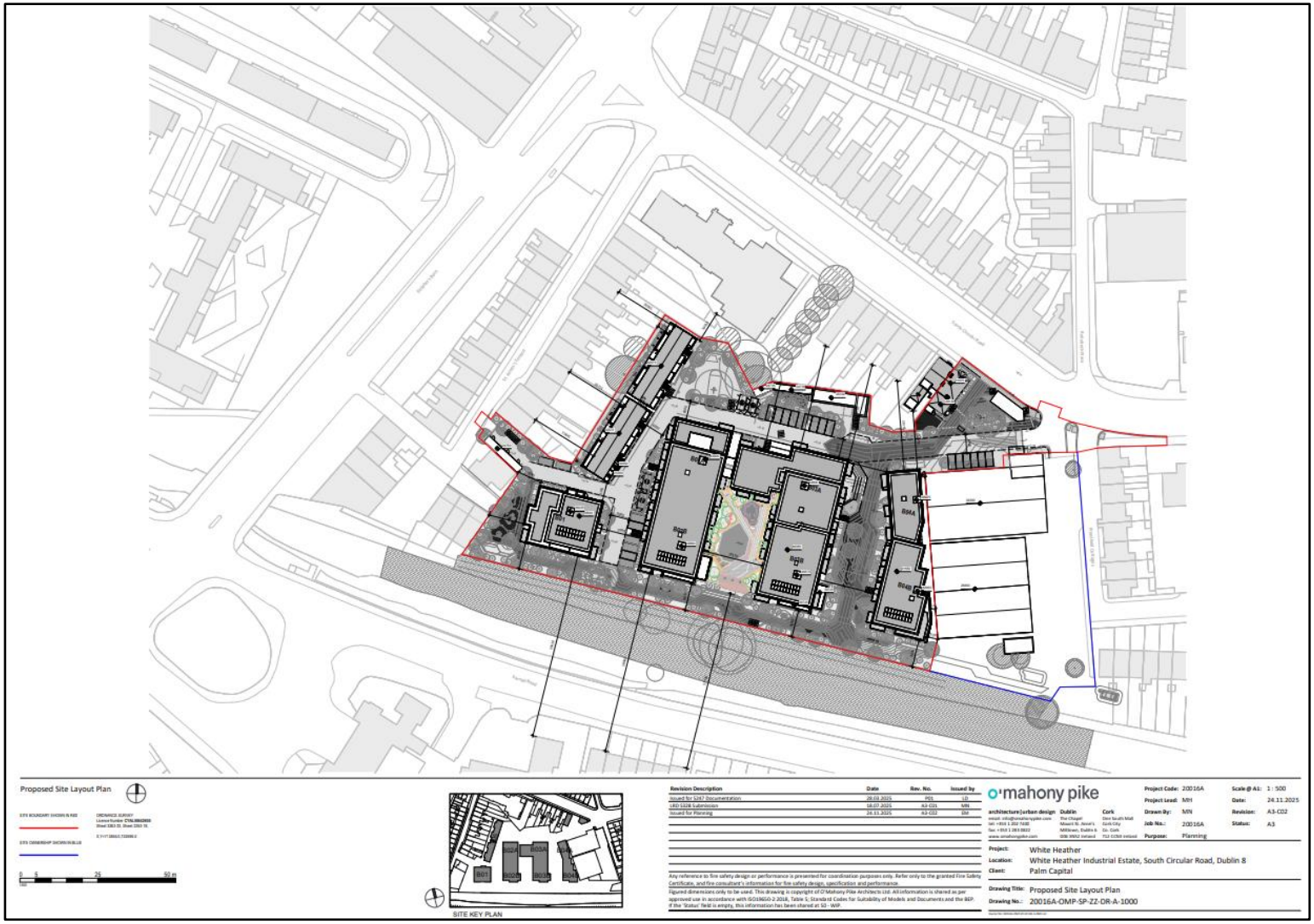

Figure 2. Site layout (OMP, 2025).

1.3.5 Drainage and Water Supply

As per the Civil Engineering Infrastructure Report for Planning (BMCE, 2025a), the existing and proposed drainage and water supply infrastructure are outlined below.

1.3.5.1 Surface Water Drainage

Surface water from the Site discharges to the existing 990x640mm brick combined sewer on South Circular Road at an unattenuated rate. This combined brick sewer is at a depth of approximately 1.9-2m below the existing road level. The Site is currently 100% impermeable.

The proposed surface water drainage system has been developed in accordance with SuDS principles. It is proposed to construct a new surface water drainage system for the development to collect runoff from roofs and paved areas and any additional runoff from landscaped areas which doesn't percolate to ground as follows:

- Intensive green roofs will be provided on the majority of flat-roof areas. The raised podium garden in the centre of the Site as well as all top roof levels will also have a layer of blue roof attenuation underneath the intensive green roof layer, allowing for rainwater falling onto the apartment blocks to be retained and slowly release into the buried drainage system at a controlled outflow;
- Permeable paving will be used for all hard paved roadways, parking bays and footpaths (with the exception of the Site entrance road at the interface with the public roadway), providing attenuation and treatment of rainwater flows. Should infiltration rates prove favourable, then these areas will facilitate the direct infiltration of rainwater to ground. Otherwise, perforated collector pipes laid within the permeable buildup will direct flows towards the new buried drainage system. The drainage design did not rely on infiltration in these areas;
- Additional attenuation will be provided via a buried attenuation tank with downstream flow control, to limit the eventual discharge rate from the Site.
- Soft landscaping will provide interception of rainfall and promote diffuse infiltration into the underlying soils. However, for the purposes of the drainage calculations, it has been assumed that 50% of the proposed landscaped areas will be positively drained, via the application of an appropriate runoff coefficient. This ensures a conservative approach;
- The Site is underlain by clays which are expected to achieve low infiltration rates. The Site infiltration rate has therefore been taken as zero in the design of the drainage system, representing 'worst-case' scenario. Once infiltration tests have been carried out on Site, the design will be reviewed to determine if the volume of below-ground attenuation can be reduced.
- The proposed drainage system will discharge to the existing combined sewer in the South Circular Road to the northeast. The system is designed to accommodate flows for the 1 in 100-year storm event.

SuDS

The proposed drainage will be designed in accordance with the principles of SuDS, as embodied in the recommendations of the GDSDS. The overarching principle of SuDS design is that surface water runoff should be managed for maximum benefit.

The following SuDS measures have been proposed in coordination with the landscape architect and wider design team:

- Permeable pavement;
- Green roofs;
- Blue roofs; and
- Attenuation systems.

1.3.5.2 Foul Drainage

Foul water from the White Heather Industrial Estate (Dolphin's Barn, Dublin 8) drains into the existing combined sewer in South Circular Road. There is an existing 940x620mm diameter brick culvert (combined sewer) running along South Circular Road along the northern boundary of the Site.

New foul drainage will be provided to collect and convey the foul flows from the Proposed Development. The proposed foul drainage layout and connections to the existing public sewer is designed in accordance with the Irish Water Standard Codes of Practice. A minimum pipe diameter of 225mm will be used at gradients no flatter than 1 in 200. It is proposed foul flows will combine with the collected surface water flows, prior to connection to the existing combined sewer in the South Circular Road.

Foul water then flows east through the Dublin City combined drainage network and ultimately discharges to the Ringsend Wastewater Treatment Plant. Treated effluent from Ringsend WwTP is then released to Dublin Bay.

1.3.5.3 Water Supply

Irish Water Record Drawings indicate that there is a selection of water supply pipe in close proximity. It is intended to connect the new drainage from the Site via the existing 225mm diameter line along the northern boundary of the Site.

The proposed water main layout and connections to existing public water mains have been designed in accordance with Irish Water Standard Codes of Practice All proposed water mains will be HDPE 100 SDR17 in accordance with Irish Water Standards. Individual houses will have their own connections (25mm O.D. PE pipe MDPE 80 SDR11) to distribution water mains via service connections and meter/boundary boxes. A 225mm diameter watermain will be required to serve the water supply and fire-fighting demand for the Proposed Development. Uisce Éireann code of practice suggests 225 pipe for 300 – 700 houses (apartment use noted possibly less as hydrant and road configuration etc different). The proposed water main layout is arranged such that all buildings are a maximum of 46.0m from a hydrant in accordance with the Department of the Environment's Building Regulations "Technical Guidance Document Part B Fire Safety". Hydrants shall comply with the requirements of BS 750:2012 and shall be installed in accordance with Irish Water's Code of Practice and Standard Details.

A Pre-Connection Enquiry (PCE) was submitted to Uisce Éireann to confirm the feasibility of a new connection to the existing network and a confirmation of feasibility was received on 22nd September 2025. The Pre-connection reference number is CDS25003323.

1.3.6 Flood Risk Assessment

A flood risk assessment was carried out in accordance with the OPW publication "The Planning System and Flood Risk Assessment Guidelines for Planning Authorities" by the Department of the Environment, Heritage and Local Government in November 2009. The Proposed Development is located within Flood Zone C (BMCE, 2025b).

It was concluded that there is no risk of flooding to the Site. Pluvial and groundwater flooding will be managed through the implementation of a new surface water network which will mitigate the risk.

1.3.7 Landscape Plan

The proposed Landscape Plan (Figure 3) aims to protect and augment the canal system as a linear green/blue infrastructural asset and biodiversity 'highway', strengthening its connection with wider city green infrastructure. Existing mature vegetation along the southern canal bank will be reinforced through lush greenery and a layered planting approach extending into the Site. The two mature trees (copper

beech (6141/B) and sycamore (6145/C)) are to be retained, with the beech given a new protective setting and the kiosk foundation designed to avoid root impacts.

Planting will follow a structured, layered strategy ranging from larger street trees to medium multi-stem shrubs, groundcover, and seasonal bulbs, creating varied experiences and ecological interest across the Site. Along the canal edge, a substantial but non-rigid planting boundary will maintain a permeable nature corridor while enabling future canal links and facilitating Waterways Ireland maintenance access. Green roofs, including intensive systems with PVs and microhabitats such as gravel and logs, will help integrate functional roof elements into a cohesive whole. Existing northern boundary walls will be retained and repaired to support overall Site continuity.

1.3.8 Lighting Plan

Sensitive lighting is required along the Grand Canal, which functions as a bat commuting and foraging corridor. To avoid disturbance, the southern boundary of the Site will be illuminated using low-level LED strip luminaires integrated into the benches. These luminaires operate at 4.8 W/m, 2700 K, and 500 lm/m, and are installed within 45° shielded profiles that direct light downwards, preventing illumination of the canal or riparian vegetation. The strips are extremely compact (10mm × 4mm) and will be dimmed to 50% output, significantly reducing overall luminance.

This approach follows Bat Conservation Ireland (2010) and ILP GN08/18 guidance for bat-sensitive lighting, including warm CCT, low output, and directional shielding.

Photometric analysis undertaken in Lighting Reality demonstrates that light spill at the canal boundary remains minimal and below bat-sensitive thresholds (<1 lux). Vertical and horizontal calculation grids along the southern edge of the footpath show no significant illumination reaching the canal corridor.

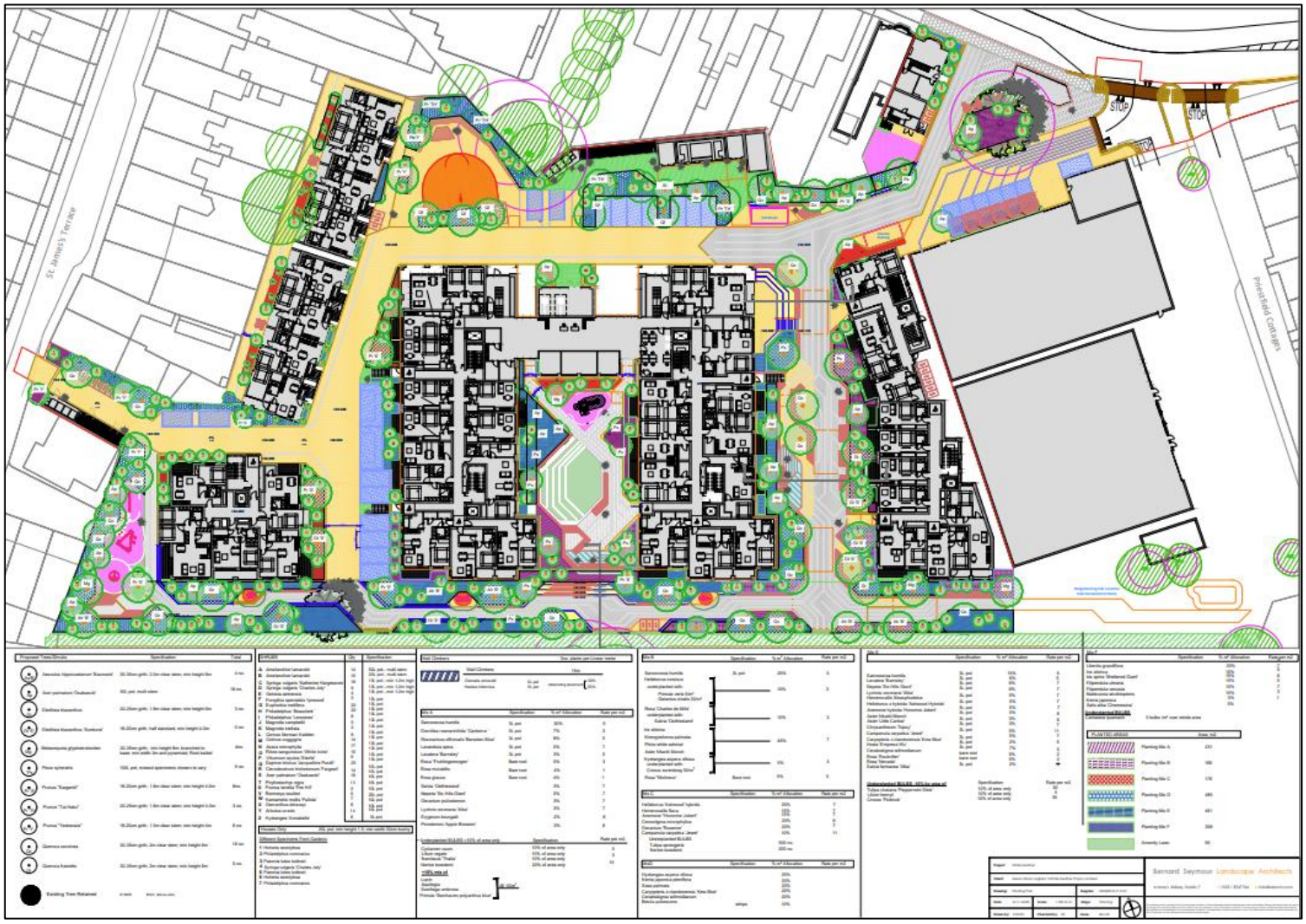

Figure 3. Landscape plan (BSLA, 2025).

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protected Areas (SPAs). The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011). It is the responsibility of each member state to designate SPAs and SACs, both of which will form part of Natura 2000, a network of protected sites throughout the European Community.

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

An AA is an assessment required prior to the grant of planning permission to determine whether a plan or project, based on best scientific knowledge, will have an adverse effect on the integrity of a European site, either alone or in combination with other plans and projects. It is required for any plan or project not directly connected with or necessary to the management of a site but likely to have a significant effect on it.

An AA is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a Natura 2000 site. Paragraph 3 states that:

“*6(3) 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. 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.”*

2.1.1 Legislative Context

The obligations in relation to an NIS have been implemented in Ireland under Chapter 3 of Part 6 of the Planning and Development Act 2024, and in particular Section 215 in relation to NIS.

A NIS may be prepared and submitted to the competent authority by the applicant for permission.

The preparation of a NIS must comply with the following content requirements as per the Planning and Development Act 2024:

- The NIS must be prepared by a person with the necessary scientific competence;
- It must specify all habitat types and species for which the relevant European site(s) is (/are) designated and those likely to be significantly affected by the development;
- The NIS must identify all potential significant effects of the development on the relevant European site(s), considering its (/their) conservation objectives. This includes effects arising from the development itself or in combination with other plans or projects;

- It must assess the identified effects and their implications for the European site(s);
- The NIS should identify any measures proposed to avoid or reduce adverse effects on the European site(s); and
- Based on the assessments, the NIS must conclude whether the proposed development will adversely affect the integrity of the European site(s). Additionally, this may extend to:
    - Retrospective consent applications, the NIS must conclude whether the development has, is, or will adversely affect the integrity of the European site; and
    - Requests to alter or extend permissions, the NIS must conclude whether the proposed changes will adversely affect the integrity of the European site.

Following the preparation and submission of a NIS by the applicant for permission, the competent authority shall carry out an appropriate assessment of the relevant development as per the obligations set out in the Planning and Development Act 2024, Part 6, Chapter 3, Section 217.

2.2 Policy Context

2.2.1 Dublin City Development Plan 2022-2028

While the County Development Plan in its entirety is relevant to the Proposed Development and can be referred to separately, policies, principles and objectives of the Dublin City Development Plan 2022-2028 that are of relevance to this Screening Report are outlined below:

- **Policy GI9:** To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites);
- **Policy GI10:** To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as supporting the favourable conservation condition of any European sites;
- **Policy GI12:** To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites; and
- **Policy GI13:** To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.

2.2.2 Dublin City Biodiversity Action Plan 2021-2025

Dublin City Biodiversity Action Plan 2021-2025 is set out to protect and improve biodiversity through specific objectives:

- **Objective 1:** Ensure effective implementation of the Dublin City Biodiversity Action Plan;
- **Objective 2:** Protect designated sites for nature conservation in accordance with the Conservation Management objectives for Natura 2000 sites and proposed Natural Heritage Areas in Dublin City;

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

2.3 Stages of Appropriate Assessment

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

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

- **Stage 1: *Screening***. The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives;
- **Stage 2: *Natura Impact Statement (NIS).*** This stage considers whether the Proposed Development alone or in combination with other projects or plans, will have adverse effects on

the integrity of a European site and includes any mitigation measures necessary to avoid, reduce or offset any negative effects. In order to inform this assessment, this NIS has been prepared comprising as it does a targeted professional scientific examination of the Proposed Development and the relevant European sites to identify and characterise any possible implications for any of the relevant European sites in view of their conservation objectives and taking account of in-combination effects. If the assessment is negative i.e. adverse effects on the integrity of a site cannot be excluded, then the process must proceed to Stage 3, or the plan or project should be abandoned;

- **Stage 3: *Assessment of alternative solutions***. If the outcome of Stage 2 is negative (i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation), the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal and
- **Stage 4: *Assessment where no alternative solutions exist and where adverse impacts remain***. The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

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

2.4 Stage 1: Appropriate Assessment Screening Conclusion

An AA Screening Report was prepared for the Proposed Development by DNV in November 2025.

The conclusion of the AA Screening Report is as follows:

"*The Proposed Development at White Heather Industrial Estate, South Circular Road, Saint James, Dublin 8 has been assessed taking into account:*

- *The nature, size and location of the proposed works and possible impacts arising from the construction works;*
- *The QIs and conservation objectives of the European sites; and*
- *The potential for in-combination effects arising from other plans and projects.*

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility ***cannot be excluded*** *that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *North Dublin Bay SAC (000206);*
- *South Dublin Bay SAC (000210);*
- *North Bull Island SPA (004006);*

- *South Dublin Bay and Tolka Estuary SPA (004024); and*
- *North-west Irish Sea SPA (004236).*

In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded in light of the above listed European sites' conservation objectives. Thus, there is a requirement to proceed to Stage 2 of the Appropriate Assessment process; and an NIS has been prepared and accompanies this submission under separate cover."

As such, this NIS will assess the potential effects of the Proposed Development on

- North Dublin Bay SAC (000206);
- South Dublin Bay SAC (000210);
- North Bull Island SPA (004006);
- South Dublin Bay and Tolka Estuary SPA (004024); and
- North-west Irish Sea SPA (004236).

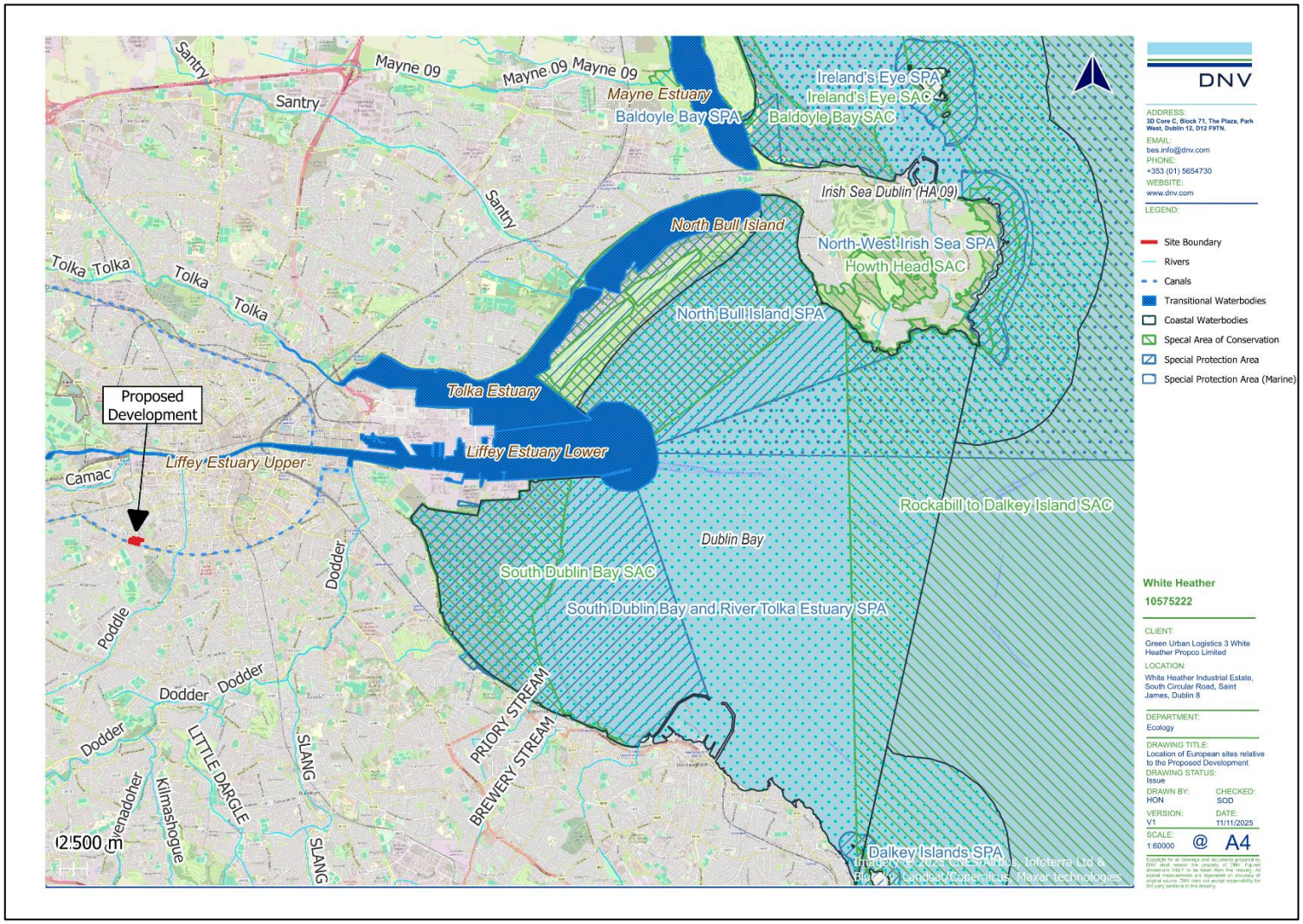

Figure 4. Location of European sites relative to the Proposed Development (DNV, 2025).

3 NIS METHODOLOGY

3.1 Guidance

This NIS has been undertaken in accordance with the following guidance:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (DEHLG, 2010 revision);
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10;
- Communication from the Commission on the precautionary principle (European Commission, 2000);
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (European Commission, 2019);
- Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission, 2021); and,
- Appropriate Assessment Screening for Development Management, OPR Practice Note PN01 (OPR, 2021).

3.2 NIS Steps

This NIS has been prepared following the steps described below:

- Description of the baseline existing environment at the Site of the Proposed Development;
- Review and description of available data for the relevant European site(s) potentially affected as identified in the Screening Report (DNV, 2025);
- Identification and description of potential effects on the relevant European site(s) and their designated QIs/SCIs;
- Assessment of the likely significance of the effects and/or impacts identified on the relevant QIs/SCIs in view of their Site Specific Conservation Objectives (SSCOs) where available;
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the relevant QIs/SCIS;
- Identification of appropriate mitigation measures to remove the likelihood of significant effects on any European site(s) and their QIs/SCI; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects once mitigation measures are adhered to.

3.3 Desk Study

A desktop study was carried out to collate and review available information, datasets and documentation sources relevant for the completion of the NIS. The desk- top study, completed in November 2025, relied on the following sources:

- Information on the network of European sites, relevant boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie and

the European Environment Agency (EEA) at https://natura2000.eea.europa.eu/;

- Information on the status of EU protected habitats and species in Ireland, obtained from the NPWS Article 17 reports (NPWS, 2019a; 2019b, 2019c);
- Text summaries of the relevant European sites taken from the respective Site Synopses for each site, available at *www.npws.ie*;
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at *www.gis.epa.ie*;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at *www.gsi.ie*;
- Information on underlying soils, obtained from Teagasc or EPA's National Soils Map at https://www.teagasc.ie/ and https://gis.epa.ie/EPAMaps/;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the extent, nature and location of the Proposed Development, provided by the applicant and their design team.

For a complete list of the documents consulted as part of this assessment, see section 6 - References.

3.4 Field Surveys

A range of ecological field surveys have been carried out at the Site to date. These are summarised in Table 1. For full details on the methods and results of the field surveys listed, please refer to the EcIA accompanying this application under separate cover. All surveys were carried out at the appropriate time of year by suitably qualified ecologists. No limitations to field surveys were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development. Results relevant to this Screening Report have been summarised in section 4.1.2.

Table 1. Field surveys undertaken at the Site.

Survey	Surveyor	Dates
Preliminary Ecology Survey	HON	24th June 2025
Breeding Bird Scoping Survey	BMcC	12th August 2025
Camera Trap Monitoring	HON	20th August – 26th September 2025
Invasive Species Survey	HON	20th August 2025

3.5 Impact Prediction

Potential impacts on the relevant European site(s) identified during the AA Screening are based on information regarding their QIs and/or SCI species, and the attributes and targets relating to their SSCOs where available. These have been informed by the desk study and any field surveys carried out prior to the preparation of this report.

Impact prediction is based on the Source-Pathway-Receptor (S-P-R) model. The following describes the steps of the S-P-R approach taken in this NIS:

- Potential sources of effects were identified based on the Proposed Development description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by Species of Conservational Importance (SCI) bird species outside of their designated SPAs);

- Up-to-date GIS spatial datasets for water catchments as well as any information from relevant site investigations and/or field surveys were used to identify the QIs/SCIs within the relevant European site(s) that have a notable S-P-R connection to the Proposed Development:
    - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any QIs/SCIs;
    - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any QIs/SCIs;
    - Air and land connectivity assessed based on Proposed Development details and proximity to QIs/SCIs; and
    - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Identification of potential impacts for those QIs/SCIs linked to the Proposed Development via notable S-P-R connections.

Where the preceding steps identified any potential for adverse impacts on any QIs/SCIs for the relevant European site(s), appropriate mitigation measures to eliminate the potential for significant adverse effects are identified in this report.

3.6 Limitations

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

4 NATURA IMPACT STATEMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology

The Site of the Proposed Development is located within the Liffey and Dublin Bay (Catchment ID 09), and the Dodder_SC_010 Sub-catchment (Sub-catchment ID 09_16) (EPA, 2025). There are no waterbodies located within the Site; however, the Grand Canal Main Line is located approximately 10m south of the Site. The Grand Canal Main line flows into the Grand Canal Basin approximately 4km downstream of the Site, which ultimately flows into the Liffey Estuary Lower, and then Dublin Bay.

The nearest waterbody is the Grand Canal Main Line (EU Code: IE_09_AWB_GCMLE), also known as the Grand Canal, located approximately 10m south of the Site. This canal flows eastward and discharges into the Grand Canal Basin (Liffey and Dublin Bay) (EU Code: IE_09_AWB_GCB), located approximately 3.4km northeast of the Site. This waterbody then flows into the Liffey Estuary Lower transitional waterbody (EU Code: IE_EA_090_0300) located approximately 4.1km northeast of the Site, and Dublin Bay coastal waterbody (EU Code: IE_EA_090_0000) located approximately 7.4km northeast of the Site. Approximately 2.5 km upstream (westwards), the Grand Canal is crossed by the Camac river waterbody (EU Code: IE_EA_09C020500). Approximately 0.8km downstream (eastwards), the Grand Canal is crossed by the Poddle river waterbody (EU Code: IE_EA_09P030800). Both river crossings are potentially culverted.

The Grand Canal is currently *At Risk* of not meeting its Water Framework Directive (WFD) objectives and was designated a *Poor* ecological status during the most recent 2019-2024 survey period (EPA, 2025). The Grand Canal Basin is currently *Not at risk* of not meeting its WFD objectives and was designated a *Good* ecological status during the most recent 2019-2024 survey period (EPA, 2025). There are no EPA water monitoring stations located along this canal (EPA, 2025).

The Liffey Estuary Lower transitional waterbody is currently *At Risk* of not meeting its WFD objectives and was designated a *Moderate* ecological status during the most recent 2019-2024 survey period (EPA, 2025). The quality status of the Liffey Estuary Lower transitional waterbody was designated as *Intermediate* by the EPA during the most recent 2018-2020 survey period (EPA, 2025). The Dublin Bay coastal waterbody is currently *Not at Risk* of not meeting its WFD objectives and was designated a *Good* ecological status during the most recent 2019-2024 survey period (EPA, 2025). The quality status of the Dublin Bay coastal waterbody was designated as *Unpolluted* by the EPA during the most recent 2018-2020 survey period (EPA, 2025).

The Camac river waterbody is currently *At Risk* of not meeting its Water Framework Directive (WFD) objectives and was designated a *Poor* ecological status during the most recent 2019-2024 survey period (EPA, 2025). The Poddle river waterbody is currently *At risk* of not meeting its WFD objectives and was designated a *Poor* ecological status during the most recent 2019-2024 survey period (EPA, 2025).

The only EPA monitoring station along the River Poddle is located at Kimmage Manor, approximately 2.9km southwest of the Site, and classified this watercourse as Poor (Q-Value: 3) in 2007 (EPA, 2025).

4.1.1.2 Geology and Hydrogeology

The Site of the Proposed Development is situated on the Dublin groundwater body (GWB) (EU Code: IE_EA_G_008). The bedrock aquifer identified beneath the Site is mapped as “Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones” (LI) (GSI, 2025). The Groundwater Vulnerability Rating assigned to groundwater beneath the Site is mapped as “Moderate” (M) to contamination from human activity (GSI, 2025).

The underlying bedrock is mapped by GSI and is classified as “Dark limestone & shale (`calp)” (New Code: CDLUCN) (GSI, 2025). The quaternary sediments beneath the Site are mapped as Till derived from limestones (GSI, 2025). The subsoil beneath the Site is Made ground (EPA, 2025).

The Dublin GWB is currently *Under review* as to whether it is meeting its Water Framework Directive (WFD) objectives and was designated a *Good* ecological status during the most recent 2019-2024 survey period (EPA, 2025).

The waterbody status for river, groundwater and transitional water bodies relevant to the Site as recorded by the EPA (2025) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003) are provided in Table 2.

Table 2. WFD risk and waterbody status.

Waterbody Name	Waterbody EU code	Location from Site	Distance from Site (km)	WFD Waterbody Status (2019-2024)	WFD 3rd Cycle Risk Status	Hydraulic Connection to the Site
Surface waterbodies						
Camac	IE_EA_09C020500	South	1.2	Poor	At risk	Crosses the Grand Canal, upstream, of the Site

Grand Canal Main Line	IE_09_AWB_GCMLE	West	0.01	Good	Not at risk	Surface water flow from the Site
Poddle	IE_EA_09P030800	East	0.7	Poor	At risk	Crosses the Grand Canal, downstream, of the Site
Grand Canal Basin (Liffey and Dublin Bay)	IE_09_AWB_GCB	Northeast	3.4	Moderate	Not at risk	Downstream of the Grand Canal
Liffey Estuary Lower	IE_EA_090_0300	Northeast	4.1	Moderate	At risk	Downstream of the Grand Canal Basin
Coastal waterbodies						
Dublin Bay	IE_EA_090_0000	Northeast	7.4	Good	Not at risk	Downstream of the Liffey Estuary Lower
Groundwater bodies						
Dublin	IE_EA_G_008	N/A	N/A	Good	Under review	Underlying GWB

4.1.1.3 Site Drainage

The existing ground levels across the overall Site are typically graded from southwest to northeast, the highest points are approximately +23.0mOD at the access road from St James Terrace at the southwest boundary, and existing levels at the lowest point are circa of +22.1mOD at the access road from South Circular Road at the northeast boundary.

4.1.2 Relevant Field Survey results

4.1.2.1 Habitats & Flora

The habitats present within the Site, as recorded in the survey area during the field survey on 25th June 2025, are summarised below.

The Site was predominantly characterised by industrial infrastructure, including buildings, rooftops, masonry walls, and extensive hardstanding such as paved areas and car parks. Vegetation was generally sparse and restricted to colonising species typical of disturbed urban environments, often growing in cracks, crevices, and unmanaged corners. Small patches of managed amenity grassland and ruderal vegetation were present mainly along the Site boundaries, alongside limited areas of scrub. Scattered mature trees also occurred around the perimeter, providing some additional habitat value.

Immediately to the south of the Site lies the Grand Canal, designated as a pNHA. The canal supports a slow-moving watercourse with associated aquatic and riparian vegetation including reed fringes and emergent species. This linear habitat corridor offers important ecological connectivity within the surrounding urban and agricultural landscape, serving as a refuge for a variety of wildlife including mammals, amphibians, and aquatic plants.

Japanese knotweed (*Reynoutria japonica*) was identified along the western boundary of the Site with active regrowth observed, including bonsai shoots and crown material. A specialist contractor (Japanese Knotweed Company) surveyed the Site and estimated the infestation covers approximately 650m^2, requiring excavation to a depth of 1.8m (approx. 2,340 tonnes of infested soil). Due to the presence of this high-impact invasive species, a site-specific management plan, including NPWS licensing, biosecurity protocols, and off-site disposal to an authorised facility, will be required. The presence of asbestos within

buildings on Site poses a risk of waste reclassification to hazardous if not addressed prior to invasive soil removal.

4.1.2.2 Fauna

Birds

Bird activity within the Site was low, consistent with its predominantly hardstanding and built-surface character and the very limited availability of nesting, foraging, or sheltering habitat. The Site supports only small numbers of common, urban-adapted bird species, as confirmed during the bird scoping survey undertaken on 13th August 2025.

Although the adjacent Grand Canal provides a more suitable linear habitat for birds, no SCIs of nearby European sites were recorded within or immediately adjacent to the Site during surveys. Furthermore, the habitats present within the Site do not provide suitable conditions for SCI species of downstream SPAs, nor do they offer supporting habitat functionally linked to any European Site.

Otter

The Site provides low suitability for otter (*Lutra lutra*) due to the absence of suitable resting features, such as dense riparian vegetation, holts, or couches. Foraging opportunities within the Site boundary are also limited, as there is no direct connection to high-quality aquatic habitat aside from the adjacent Grand Canal.

During the walkover survey on 24th June 2025, several small burrows and areas of digging were noted along the canal banks, however, these were not characteristic of otter holts and no other field signs (e.g., spraint, tracks, slides, feeding remains) were recorded.

A camera trap was deployed between 20th August and 11th September 2025, to supplement the walkover assessment, targeting features most likely to be used by mammals, including canal-side vegetation. The camera trap survey did not record otter, with detections limited to common, urban-adapted species such as red fox and domestic cat, as well as several bird species. No protected or qualifying mammal species were confirmed.

4.2 Summary Of Relevant European Sites

The following descriptions of the relevant habitats and species occurring within the European site(s) considered in this NIS have been extracted from the Standard Data Forms (EEA, 2025), Site Synopses, and any supporting documents available for the relevant site(s).

4.2.1 North Dublin Bay SAC

The following description of the North Dublin Bay SAC is extracted from the Site Synopsis (NPWS, 2013a) for the Site:

"North Bull Island is a sandy spit which formed after the building of the South Wall and Bull Wall in the 18th and 19th centuries. It now extends for about 5 km in length and is up to 1 km wide in places. A well-developed and dynamic dune system stretches along the seaward side of the island. Various types of dunes occur, from fixed dune grassland to pioneer communities on foredunes. Marram Grass (Ammophila arenaria) is dominant on the outer dune ridges, with Lyme-grass (Leymus arenarius) and Sand Couch (Elymus farctus) on the foredunes. Behind the first dune ridge, plant diversity increases with the appearance of such species as Wild Pansy (Viola tricolor), Kidney Vetch (Anthyllis vulneraria), Common Bird's-foot-trefoil (Lotus corniculatus), Common Restharrow (Ononis repens), Yellow-rattle (Rhinanthus minor) and Pyramidal Orchid (Anacamptis pyramidalis). In these grassy areas and slacks, the scarce Bee Orchid (Ophrys apifera) occurs.

About 1 km from the tip of the island, a large dune slack with a rich flora occurs, usually referred to as the 'Alder Marsh' because of the presence of Alder trees (Alnus glutinosa). The water table is very near the surface and is only slightly brackish. Saltmarsh Rush (Juncus maritimus) is the dominant species, with Meadowsweet (Filipendula ulmaria) and Devil's-bit Scabious (Succisa pratensis) being frequent. The orchid flora is notable and includes Marsh Helleborine (Epipactis palustris), Common Twayblade (Listera ovata), Autumn Lady's-tresses (Spiranthes spiralis) and Marsh Orchids (Dactylorhiza spp.)."

The following description of the Site is extracted from the Conservation Objectives Supporting Document (NPWS, 2013b) for the Site:

"North Dublin Bay SAC covers the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall Lighthouse across to the Martello Tower at Howth Head. The North Bull Island is the focal point of the site. The island is a sandy spit which formed after the building of the South Wall and Bull Wall in the 18th and 19th centuries. It now extends for about 5km in length and is up to 1km wide in places. The island supports a well developed dune system including a large dune slack, and saltmarsh which extends along the length of the landward side of the island. The island is separated from the mainland by intertidal mud and sandflats and is split into two sections by the Bull Island causeway, which also divides the intertidal areas."

4.2.2 South Dublin Bay SAC

The following description of the South Dublin Bay SAC is extracted from the Site Synopsis (NPWS, 2015a) for the site:

"The bed of Dward Eelgrass (Zostera noltii) found below Merrion Gates is the largest stand on the east coast. Green algae (Enteromorpha spp. and Ulva lactuca) are distributed throughout the area at a low density. Fucoid algae occur on the rocky shore in the Maretimo to Dún Laoghaire area. Species include Fucus spiralis, F. vesiculosus, F. serratus, Ascophyllum nodosum and Pelvetia canaliculata.

Several small, sandy beaches with incipient dune formation occur in the northern and western sectors of the site, notably at Poolbeg, Irishtown and Merrion/ Booterstown. The formation at Booterstown is very recent. Drift line vegetation occurs in association with the embryonic and incipient fore dunes. Typically drift lines occur in a band approximately 5 m wide, though at Booterstown this zone is wider in places. The habitat occurs just above the High Water Mark and below the area of embryonic dune. Species present are Sea Rocket (Cakile maritima), Frosted Orache (Atriplex laciniata), Spear-leaved Orache (A. prostrata), Prickly Saltwort (Salsola kali) and Fat Hen (Chenopodium album). Also occurring is Sea

Sandwort (Honkenya peploides), Sea Beet (Beta vulgaris subsp. maritima) and Annual Sea-blite (Suaeda maritima). A small area of pioneer saltmarsh now occurs in the lee of an embryonic sand dune just north of Booterstown Station. This early stage of saltmarsh development is here characterised by the presence of pioneer stands of glassworts (Salicornia spp.) occurring below an area of drift line vegetation. As this is of very recent origin, it covers a small area but ample areas of substrate and shelter are available for the further development of this habitat".

4.2.3 North Bull Island SPA

The following description of the North Bull Island SPA is extracted from the Site Synopsis (NPWS, 2014a) for the Site:

"This site covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head. The North Bull Island sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port during the 18th and 19th centuries. It is almost 5 km long and 1 km wide and runs parallel to the coast between Clontarf and Sutton. Part of the interior of the island has been converted to golf courses.

Saltmarsh extends along the length of the landward side of the island and provides the main roost site for wintering birds in Dublin Bay. The island shelters two intertidal lagoons which are divided by a solid causeway. These lagoons provide the main feeding grounds for the wintering waterfowl. The sediments of the lagoons are mainly sands with a small and varying mixture of silt and clay. Green algal mats (Ulva spp.) are a feature of the flats during summer. These sediments have a rich macro-invertebrate fauna, with high densities of Lugworm (Arenicola marina) and Ragworm (Hediste diversicolor)".

The following description of the Site is extracted from the Conservation Objectives Supporting Document (NPWS, 2014b) for the Site:

"North Bull Island Special Protection Area, and South Dublin Bay and River Tolka Estuary Special Protection Area, are two designated SPAs located in Dublin Bay.

The site designated as North Bull Island Special Protection Area covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head.

North Bull Island lies roughly parallel to the shore and is a low-lying sandy spit, about 4.85 km long and 0.70 km wide (McCorry & Ryle, 2009a). It is a relatively recent geomorphological feature having emerged as a result of the build up of sediment over the last 200 years following the construction of the South and North Bull walls during the 18th and 19th centuries. The North Bull Wall marks the southern boundary of the island and is connected to the mainland by a wooden bridge. The island is actively accreting (Ryle et al. 2009a). A sandy beach, Dollymount Strand, occurs on the seaward side of the island and intertidal mudflats occur on the inner (mainland side) fringed by saltmarsh. A causeway built in 1965 provides the main access to the island and divides the intertidal flats into two areas known as the North and South Bull lagoons. Both of these are covered completely by most tides and are drained by permanent channels; the southern lagoon fills and empties beneath Bull Bridge, while water in the northern lagoon is channelled in and out through Sutton Creek (Harris, 1977). These lagoons provide the main feeding grounds for the wintering waterfowl while the fringing saltmarsh provides the main roost site for wintering birds in Dublin Bay. Macroalgal mats of filamentous Ulva spp. (formerly Enteromorpha spp.) 1 are prevalent".

4.2.4 South Dublin Bay and River Tolka Estuary SPA

The following description of the South Dublin Bay and River Tolka Estuary SPA is extracted from the Site Synopsis (NPWS, 2015b) for the Site:

"The South Dublin Bay and River Tolka Estuary SPA comprises a substantial part of Dublin Bay. It includes the intertidal area between the River Liffey and Dun Laoghaire, and the estuary of the River Tolka to the north of the River Liffey, as well as Booterstown Marsh. A portion of the shallow marine waters of the bay is also included.

In the south bay, the intertidal flats extend for almost 3 km at their widest. The sediments are predominantly well-aerated sands. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. The landward boundary is now almost entirely artificially embanked. There is a bed of Dwarf Eelgrass (Zostera noltii) below Merrion Gates which is the largest stand on the east coast. Green algae (Ulva spp.) are distributed throughout the area at a low density. The macroinvertebrate fauna is well-developed, and is characterised by annelids such as Lugworm (Arenicola marina), Nephthys spp. and Sand Mason (Lanice conchilega), and bivalves, especially Cockle (Cerastoderma edule) and Baltic Tellin (Macoma balthica). The small gastropod Spire Shell (Hydrobia ulvae) occurs on the muddy sands off Merrion Gates, along with the crustacean Corophium volutator. Sediments in the Tolka Estuary vary from soft thixotrophic muds with a high organic content in the inner estuary to exposed, well-aerated sands off the Bull Wall. The site includes Booterstown Marsh, an enclosed area of saltmarsh and muds that is cut off from the sea by the Dublin/Wexford railway line, being linked only by a channel to the east, the Nutley stream. Sea water incursions into the marsh occur along this stream at high tide. An area of grassland at Poolbeg, north of Irishtown Nature Park, is also included in the site".

The following description of the site is extracted from the relevant Conservation Objectives Supporting Document (NPWS, 2014c):

"North Bull Island Special Protection Area, and South Dublin Bay and River Tolka Estuary Special Protection Area, are two designated SPAs located in Dublin Bay.

The site designated as North Bull Island Special Protection Area covers all of the inner part of north Dublin Bay, with the seaward boundary extending from the Bull Wall lighthouse across to Drumleck Point at Howth Head.

North Bull Island lies roughly parallel to the shore and is a low-lying sandy spit, about 4.85 km long and 0.70 km wide (McCorry & Ryle, 2009a). It is a relatively recent geomorphological feature having emerged as a result of the build up of sediment over the last 200 years following the construction of the South and North Bull walls during the 18th and 19th centuries. The North Bull Wall marks the southern boundary of the island and is connected to the mainland by a wooden bridge. The island is actively accreting (Ryle et al. 2009a). A sandy beach, Dollymount Strand, occurs on the seaward side of the island and intertidal mudflats occur on the inner (mainland side) fringed by saltmarsh. A causeway built in 1965 provides the main access to the island and divides the intertidal flats into two areas known as the North and South Bull lagoons. Both of these are covered completely by most tides and are drained by permanent channels; the southern lagoon fills and empties beneath Bull Bridge, while water in the northern lagoon is channelled in and out through Sutton Creek (Harris, 1977). These lagoons provide the main feeding grounds for the wintering waterfowl while the fringing saltmarsh provides the main roost site for wintering birds in Dublin Bay. Macroalgal mats of filamentous Ulva spp. (formerly Enteromorpha spp.) are prevalent".

4.2.5 North-west Irish Sea SPA (004236)

The following description of the North-west Irish Sea SPA is extracted from the Site Synopsis (NPWS, 2023) for the Site:

"*The North-west Irish Sea cSPA constitutes an important resource for marine birds. The estuaries and bays that open into it along with connecting coastal stretches of intertidal and shallow subtidal habitats, provide safe feeding and roosting habitats for waterbirds throughout the winter and migration periods. These areas, along with more pelagic marine waters further offshore, provide additional supporting habitats (for foraging and other maintenance behaviours) for those seabirds that breed at colonies on the north-west Irish Sea's islands and coastal headlands. These marine areas are also important for seabirds outside the breeding period.*

This SPA extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km2 in area.

This SPA is ecologically connected to several existing SPAs in this area. The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Common Scoter, Red-throated Diver, Great Northern Diver, Fulmar, Manx Shearwater, Shag, Cormorant, Little Gull, Kittiwake, Black-headed Gull, Common

Gull, Lesser Black-backed Gull, Herring Gull, Great Black-backed Gull, Little Tern, Roseate Tern, Common Tern, Arctic Tern, Puffin, Razorbill and Guillemot.

The breeding seabird species listed for those SPAs, which abut the North-West Irish Sea SPA are: Fulmar (Lambay Island SPA); Cormorant (Skerries Island SPA; Ireland's Eye SPA; Lambay Island SPA); Shag (Skerries Island SPA; Lambay Island SPA); Lesser Black-backed Gull (Lambay Island SPA); Herring Gull (Skerries Island SPA; Ireland's Eye SPA; Lambay Island SPA); Kittiwake (Lambay Island SPA; Ireland's Eye SPA; Howth Head SPA); Roseate Tern (Rockabill SPA); Common Tern (Rockabill SPA;); Arctic Tern (Rockabill SPA); Little Tern (Boyne Estuary SPA); Guillemot (Lambay Island SPA, Ireland's Eye SPA); Razorbill (Lambay Island SPA, Ireland's Eye SPA); and Puffin (Lambay Island SPA). The Common Tern population that is listed for the nearby South Dublin Bay and River Tolka Estuary SPA is also likely to use this SPA as a foraging resource.

Informed by two surveys of the western Irish Sea region in 2016 an estimated 120,232 and 34,626 individual marine birds occurred in this SPA during autumn and winter respectively. Those marine bird species whose estimated abundances equalled or exceeded 1% of the total estimated size of the winter assemblage are: Red-throated Diver (538), Fulmar (506), Little Gull (391), Kittiwake (944), Black-headed Gull (508), Common Gull (2,866), Herring Gull (6,893), Great Black-backed Gull (2,096), Razorbill (4,638) and Guillemot (13,914).

The estimated 2016 summer abundance of Manx Shearwater in the North West Irish Sea SPA is 13,010 and is of international importance. The estimated 2016 autumn and winter abundances of Great Northern Diver in the North West Irish Sea SPA is 248 and 230 respectively and are of international importance. The estimated abundances of Common Scoter over parts of this SPA can reach significant numbers (e.g. 14,567 in December 2018) which is also of international importance."

4.2.6 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective conservation objectives for each of the relevant European site(s) are detailed in Table A1, Appendix I. The conservation status of each QI/SCI was sourced from the relevant Standard Data Forms (EEA, 2025), and the latest 'National Status' is taken from the Article 17 Report (NPWS, 2019a; 2019b; 2019c) and BoCCI (Gilbert *et al.,* 2021) respectively.

Table 3. QIs/SCIs and their Conservation Objectives for the relevant European sites.

QI/SCI (* = priority habitat)	Conservation Status	National Status	Conservation Objective
North Dublin Bay SAC (000206)			
1140 Mudflats and sandflats not covered by seawater at low tide	Good	Unfavourable-Inadequate	To maintain the favourable conservation condition of these habitats
1210 Annual vegetation of drift lines	Good	Unfavourable-Inadequate	To restore the favourable conservation condition of these habitats
1310 *Salicornia* and other annuals colonising mud and sand	Excellent	Favourable	To restore the favourable conservation condition of these habitats
1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	Good	Deteriorating	To maintain the favourable conservation condition of these habitats
1410 Mediterranean salt meadows (Juncetalia maritimi)	Good	Deteriorating	To maintain the favourable conservation condition of these habitats
2110 Embryonic shifting dunes	Excellent	Unfavourable-Inadequate	To restore the favourable conservation condition of these habitats

2120 Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	Good	Unfavourable-Inadequate	To restore the favourable conservation condition of these habitats
2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)	Excellent	Unfavourable-Bad	To restore the favourable conservation condition of these habitats
2190 Humid dune slacks	Excellent	Deteriorating	To restore the favourable conservation condition of these habitats
1395 *Petalophyllum ralfsii* (Petalwort)	Good	Favourable	To maintain the favourable conservation condition of these habitats
South Dublin Bay SAC (000210)			
1140 Mudflats and sandflats not covered by seawater at low tide	Good	Unfavourable-Inadequate	To maintain the favourable conservation condition of these habitats
1210 Annual vegetation of drift lines	Good	Unfavourable-Inadequate	N/A
1310 *Salicornia* and other annuals colonising mud and sand	Good	Favourable	N/A
2110 Embryonic shifting dunes	Good	Unfavourable-Inadequate	N/A
North Bull Island SPA (004006)			
A046 Light-bellied brent goose (*Branta bernicla hrota*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A048 Shelduck (*Tadorna tadorna*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A052Teal (*Anas crecca*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A054 Pintail (*Anas acuta*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A056 Shoveler (*Anas clypeata*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A130 Oystercatcher (*Haematopus ostralegus*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A140 Golden plover (*Pluvialis apricaria*)	Good	Red list	To maintain the favourable conservation condition of this species
A141 Grey plover (*Pluvialis squatarola)*	Excellent	Red list	To maintain the favourable conservation condition of this species

A143 Knot (*Calidris canutus*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A144 Sanderling (*Calidris alba*)	Excellent	Green list	To maintain the favourable conservation condition of this species
A149 Dunlin (*Calidris alpina*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A156 Black-tailed godwit (*Limosa limosa*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A157 Bar-tailed godwit (*Limosa lapponica*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A160 Curlew (*Numenius arquata*)	Excellent	Red list	To maintain the favourable conservation condition of this species
A162 Redshank (*Tringa totanus*)	Excellent	Red list	To maintain the favourable conservation condition of this species
Turnstone (*Arenaria interpres*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A179 Black-headed gull (*Chroicocephalus ridibundus*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A999 Wetland and Waterbirds	N/A	N/A	To maintain the favourable conservation condition of this species
South Dublin Bay and River Tolka Estuary SPA (004024)			
A046 Light-bellied Brent Goose (*Branta bernicla hrota*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A130 Oystercatcher (*Haematopus ostralegus*)	Good	Red list	To maintain the favourable conservation condition of this species
A137 Ringed plover (*Charadrius hiaticula*)	Good	Amber list	To maintain the favourable conservation condition of this species
A141 Grey plover (*Pluvialis squatarola*)	Good	Red list	N/A
A143 Knot (*Calidris canutus*)	Good	Red list	To maintain the favourable conservation condition of this species

A144 Sanderling (*Calidris alba*)	Excellent	Green list	To maintain the favourable conservation condition of this species
A149 Dunlin (*Calidris alpina*)	Good	Red list	To maintain the favourable conservation condition of this species
A157 Bar-tailed godwit (*Limosa lapponica*)	Good	Red list	To maintain the favourable conservation condition of this species
A162 Redshank (*Tringa totanus*)	Good	Red list	To maintain the favourable conservation condition of this species
A179 Black-headed gull (*Chroicocephalus ridibundus*)	Good	Amber list	To maintain the favourable conservation condition of this species
A192 Roseate tern (*Sterna dougallii*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A193 Common tern (*Sterna hirundo*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A194 Arctic tern (*Sterna paradisaea*)	Excellent	Amber list	To maintain the favourable conservation condition of this species
A999 Wetland and Waterbirds	N/A	N/A	To maintain the favourable conservation condition of this species
North-west Irish Sea SPA (004236)			
Red-throated diver (*Gavia stellata*) [A001]	Not available[1]	Amber list	To maintain the favourable conservation condition of these species
Great northern Diver (*Gavia immer*) [A003]		Amber list	
Fulmar (*Fulmarus glacialis*) [A009]		Amber list	To restore the favourable conservation condition of this species
Manxs Shearwater (*Puffinus puffinus*) [A013]		Amber list	To maintain the favourable conservation condition of these species
Cormorant (*Phalacrocorax carbo*) [A017]		Amber list	To restore the favourable conservation condition of these species
Shag (*Phalacrocorax aristotelis*) [A018]		Amber list	
Common scoter (*Melanitta nigra*) [A065]		Red list	To maintain the favourable conservation condition of this species
Little gull (*Larus minutus*) [A177]		Amber list	N/A
Black-headed gull (*Chroicocephalus ridibundus*) [A179]		Amber list	To maintain the favourable conservation condition of these species
Common gull (*Larus canus*) [A182]		Amber list	

[1] Conservation status details for these SCI species are not yet available as North-west Irish Sea was granted SPA status recently. The site conservation objectives are used for the purposes of this assessment.

Lesser black-backed gull (*Larus fuscus*) [A183]		Amber list	
Herring gull (*Larus argentatus*) [A184]		Amber list	To restore the favourable conservation condition of this species
Great black-backed gull (*Larus marinus*) [A187]		Green list	To maintain the favourable conservation condition of this species
Kittiwake (*Rissa tridactyla*) [A188]		Red list	To restore the favourable conservation condition of this species
Roseate tern (*Sterna dougallii*) [A192]		Amber list	To maintain the favourable conservation condition of these species
Common tern (*Sterna hirundo*) [A193]		Amber list	
Arctic tern (*Sterna paradisaea*) [A194]		Amber list	
Little tern (*Sterna albifrons*) [A195]		Amber list	
Guillemot (*Uria aalge*) [A199]		Amber list	
Razorbill (*Alca torda*) [A200]		Red list	
Puffin (*Fratercula arctica*) [A204]		Red list	To restore the favourable conservation condition of this species

4.3 Impact Prediction

This section follows the S-P-R method as outlined in section 3.5 to identify if and how any of the QIs/SCIs of the relevant European site are linked to the Proposed Development. Once the connections have been identified the potential impacts of the Proposed Development on the North Dublin Bay SAC (000206), South Dublin Bay SAC (000210), North Bull Island SPA (004006), South Dublin Bay and Tolka Estuary SPA (004024), and North-west Irish Sea SPA (004236), in light of their QIs/SCIs are assessed.

For the purposes of objectivity and clarity, mitigation measures **are not considered in the impact prediction.** This includes all measures that will act limit or eliminate the potential for significant adverse impacts on the relevant European site.

4.3.1 Potential impacts of the Proposed Development on key Species and Habitats

The following elements of the Proposed Development were identified and assessed for their potential to cause likely significant effects on European sites.

Construction Phase (*Estimated duration: **24 months***)

- Uncontrolled releases of silt, sediments and/or other pollutants to air due to earthworks;
- Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies (i.e., the Irish Sea);
- Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater;
- Waste generation during the Construction Phase comprising soils and construction wastes;
- Increased noise, dust and/or vibrations as a result of construction activity;

- Increased dust and air emissions from construction traffic;
- Increased lighting in the vicinity as a result of construction activity; and
- Increased human presence and activity as a result of construction activity.

Operational Phase *(Estimated duration: Indefinite)*

- Surface water drainage from the Site of the Proposed Development;
- Foul water from the Proposed Development;
- Increased lighting at the Site and in the vicinity emitted from the Proposed Development;
- Increased human presence and activity at the Site and in the vicinity as a result of the Proposed Development; and
- Collision risk to birds flying over the Site due to presence of new buildings.

Table 4 outlines the identified pathways between the Proposed Development and the relevant QIs/SCIs, and assesses the potential significant effects of the Proposed Development on these. The assessment outlined below does not consider mitigation measures that will be implemented as part of the Proposed Development, but the nature of mitigation that will be required to eliminate the potential for significant adverse impacts is identified in the table, if any.

Table 4. Assessment of potential impacts of the Proposed Development on the QIs/SCIs of the relevant European sites.

European sites	Description	Impact Pathway(s)	Assessment of likely significant effects	Mitigation Requirement
• North Dublin Bay SAC (000206) • South Dublin Bay SAC (000210) • North Bull Island SPA (004006) • South Dublin Bay and Tolka Estuary SPA (004024) • North-west Irish Sea SPA (004236)	Water quality impacts	Weak hydrological connection to Dublin Bay. In the event of heavy rainfall, surface water from the Site may drain to the Grand Canal, and reach the downstream European sites within Dublin Bay.	Significant adverse effects to the QIs/SCIs of these European sites are considered unlikely given the distance to the sites. However, in a worst-case scenario, construction related pollution events at the Site could contribute to a reduction in water quality in the European sites, in the absence of mitigation measures.	**Construction Phase:** Precautionary surface water protection measures as detailed in section 4.4.3.1 and 4.4.3.2. **Operational Phase:** None required.
	Spread of invasive species	Weak hydrological connection to Dublin Bay and the presence of Japanese knotweed within the Site.	Significant adverse effects to the QIs/SCIs of these European sites are considered unlikely given the distance to the sites. However, in a worst-case scenario, the spread of invasive species at the Site could contribute to a reduction in habitat quality in the European sites, in the absence of mitigation measures.	**Construction Phase:** Precautionary measures as detailed in section 4.4.2.2. **Operational Phase:** Precautionary measures as detailed in section 4.4.4.1

4.3.2 Potential for In-combination Effects

4.3.2.1 Existing Planning Permissions

A search of planning applications located within a 500m radius of the Site of the Proposed Development was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie) and Dublin City Council Planning Applications online map. Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

It is noted that the majority of the developments within the vicinity of the Site of the Proposed Development are applications granted for residential developments. The larger developments in the vicinity of the Proposed Development are outlined in Table 5:

Table 5. Granted and pending development applications within 500m of the Proposed Development.

Planning Reference	Planning Authority	Status	Location
319532	**Dublin City Council**	**Granted with conditions**	**Dolphin Park, Crumlin Road, Dublin 12**
Development Description Demolition of the existing clubhouse for the construction of a new two-storey clubhouse, realignment and resurfacing of pitch no. 1. The development proposes the provision of a shed building with an immediate use as a gym to be changed to maintenance and storage use upon completion of the development and all associated site works. A Natura Impact Statement has been prepared in respect of the proposed development. **Potential for In-combination effects** NIS sets out avoidance, design requirements and mitigation measures to ensure no impacts on European sites. Therefore, no in-combination effects are not anticipated.			
316828	**Dublin City Council**	**Granted with conditions**	**Tallaght/Clondalkin to Dublin City**
Development Description Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme. Potential for In-combination effects **Potential for In-combination effects** NIS sets out avoidance, design requirements and mitigation measures to ensure no impacts on European sites. Therefore, no in-combination effects are not anticipated.			
315314	**Dublin City Council**	**Granted with conditions**	**Site at lands known as Bright Ford Rialto, Herberton Road, Dublin 12, D12 HT99**
Development Description Demolition of buildings on site (1,316 sq. m. gross floor area) and the construction of a mixed use retail/commercial and residential development totalling 9,177 sq. m. gross floor area. Residential development will consist of 60 apartments. **Potential for In-combination effects** No NIS completed for this development. Due to the small nature of this development, and the urban buffer between the it and the Proposed Development, in-combination effects are not anticipated.			
307221	**Dublin City Council**	**Granted with conditions**	**Former Bailey Gibson Site, 326-328 South Circular Road, Dublin 8**
Development Description Demolition of all structures, construction of 416 no. residential units (4 no. houses, 412 no. apartments) and associated site works. **Potential for In-combination effects**			

NIS sets out avoidance, design requirements and mitigation measures to ensure no impacts on European sites. Therefore, no in-combination effects are not anticipated.			
308917	**Dublin City Council**	**Granted with conditions**	**Former Player Wills site and undeveloped Land in Ownership of Dublin CIty Council, South Circular Road, Dublin 8**
Development Description Demolition of all buildings excluding the original fabric of the former Player Wills Factory, construction of 492 no. Build to Rent apartments, 240 no. Build to Rent shared accommodation along, creche and associated site works. **Potential for In-combination effects** No NIS completed for this development. EIAR sets out avoidance, design requirements and mitigation measures to ensure no impacts on biodiversity. Therefore, no in-combination effects are not anticipated.			
302149	**Dublin City Council**	**Granted with conditions**	**43-50, Dolphin's Barn Street, Dublin 8**
Development Description Demolition of former factory building & construction of a part 4 to part 7 storey residential / retail building, stepping down to 3 storeys to the rear, over basement & ground floor retail & car park with 1 no. retail unit at ground floor & 70 no. apartments from first to sixth floor level. Balconies are provided for the residential apartments on the eastern, western, southern and northern elevations. Provision of 67 no. car parking spaces at basement level & 18 no. car parking spaces with bike store. **Potential for In-combination effects** NIS sets out avoidance, design requirements and mitigation measures to ensure no impacts on European sites/biodiversity. Therefore, no in-combination effects are not anticipated.			
305061	**Dublin City Council**	**Granted with conditions**	**355 South Circular Road, Dublin 8**
Development Description 317 no. student bedspace and associated site works. **Potential for In-combination effects** NIS sets out avoidance, design requirements and mitigation measures to ensure no impacts on European sites. Therefore, no in-combination effects are not anticipated.			

4.3.2.2 Relevant Policies and Plans

The local policies and plans detailed in section 2.2 were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA, and where potential for LSEs has been identified, an NIS has been prepared which identifies appropriate mitigation. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development. The Dublin City Development Plan 2022-2028 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

4.4 Avoidance and Mitigation Measures

The following sections outline the avoidance and mitigation measures identified to eliminate the potential for significant adverse impacts on the relevant European sites. Once the recommended measures outlined in the following sections are implemented in full, no adverse impacts on the relevant European sites or their QIs/SCIs are anticipated as a result of the Proposed Development. These mitigation measures will be included in the CEMP that will be prepared prior to commencing works by the appointed construction contractor.

4.4.1 Summary of Potential Effects

Potential significant effects arising from the **Construction Phase** include:

- Water quality impacts in designated sites arising from surface water run-off during the Construction Phase; and
- Spread of invasive species during the Construction Phase.

Potential significant effects arising from the **Operational Phase** include:

- Spread of invasive species during the Operational Phase.

The following mitigation and enhancement measures will ensure no significant effects arise on designated sites as a result of the Proposed Development, either alone or in-combination with other projects.

4.4.2 Pre-Construction Phase

4.4.2.1 Mitigation 1: Ecological Clerk of Works (ECoW)

Prior to the commencement of the Construction Phase, the suitably qualified Ecologist/ECoW will be appointed and present on-site. The ECoW will be responsible for ensuring that all ecological mitigation measures outlined in this NIS are correctly implemented and adhered to throughout the Pre-Construction and Construction Phases.

The ECoW will also:

- Monitor and advise on compliance with all relevant licenses and permits (e.g., NPWS licence for Japanese knotweed management);
- Provide guidance to contractors on ecological best practice;
- Maintain records of all ecological inspections, mitigation measures, and any incidents; and
- Act as the primary point of contact for ecological issues throughout the works.

4.4.2.2 Mitigation 2: Japanese Knotweed Management Plan

Two infestations of Japanese knotweed were identified on Site. Given its known presence on Site, and the presence of a weak hydrological pathway to the Grand Canal and downstream European sites in Dublin Bay, a Japanese Knotweed Management Plan (JKMP) will be prepared and implemented prior to any site preparation, demolition, excavation or construction works.

The JKMP will be prepared by a suitably qualified invasive species specialist and will include, at a minimum, the following key elements:

- NPWS Licensing:
    - Preparation of all documentation required to obtain an NPWS Regulation 49 licence for excavation, handling and off-site transport of Japanese knotweed-infested soils.
- Cradle-to-Grave Soil Management:
    - A full methodology for the excavation, containment, transport and disposal of knotweed-impacted soils to an authorised facility, including:
        - Estimated excavation to a depth of 1.8m across c. 650m^2;
        - Procedures for safe handling of approximately 1,170 m^3 (c. 2,340 tonnes) of contaminated soil; and
        - Requirements for covered haulage, designated vehicle routes and acceptance at a licensed receiving facility.
- Biosecurity Protocols:

- Site-specific biosecurity measures to prevent accidental spread, including:
    - Exclusion zones and signage;
    - Dedicated machinery and wash-down procedures;
    - Controls on stockpiling, material movement and personnel access; and
    - Use of geotextile membranes where required.

- Waste Classification and Testing:
    - Procedures for Waste Acceptance Criteria (WAC) testing under EWC 170504, and protocols to prevent reclassification as hazardous waste where asbestos-containing materials are present.

- Site Access and Traffic Management:
    - Identification of safe access routes, temporary work/storage areas and required traffic management measures.

- Monitoring and Verification:
    - Requirements for specialist supervision and the preparation of a completion verification report confirming that no viable rhizome material remains on site.

The preparation and implementation of a detailed, NPWS-licensed JKMP prior to commencement of any works will ensure that all Japanese knotweed-contaminated soils are appropriately identified, controlled and removed in accordance with legislation and best practice. With this mitigation in place, no spread of Japanese knotweed is anticipated, and no adverse effects on the integrity of any downstream European site will arise.

4.4.3 Construction Phase

4.4.3.1 Mitigation 3: Surface Water Protection

These surface water mitigation measures will treat the source (e.g., refuelling of plant to be carried out at designated refuelling station locations on Site) or remove the pathway (e.g., no release of wastewater generated on-site into nearby waterbodies during the Construction Phase). The following mitigation measures will protect surface waters during the Construction Phase of the Proposed Development.

All works carried out as part of the Proposed Development will comply with all Statutory Legislation including the Local Government (Water Pollution) Acts, 1977 and 1990 and the contractor will cooperate fully with the Environment Section of Dublin City Council in this regard.

Personnel working on the Site will be trained in the implementation of environmental control and emergency procedures. Procedures and relevant documents produced will be formulated in consideration of standard best international practice.

The following standard measures will be implemented by the appointed Contractor (unless otherwise stated) to protect surface water during the Construction Phase of the Proposed Development:

- Run-off from machine service and concrete mixing areas will under no circumstances be allowed to enter the Grand Canal;

- If contaminated soils are encountered during construction works or if material becomes contaminated by, for example, a fuel spill or hydraulic fluid leak, the contaminated materials will be segregated, placed on an impermeable membrane so as to prevent contamination of the

underlying ground, and covered to prevent contaminants being mobilised by rainwater run-off. The materials will remain covered until such time as they can be compliantly removed from the site by appropriately authorised waste management contractors;

- A regular review of weather forecasts for heavy rainfall will be conducted, and a contingency plan will be prepared before and after such events to minimise any potential run-off containing silt, sediment, or other pollutants;
- Refuelling of plant during the Construction Phase will only be carried out at designated refuelling station locations on Site. Each station will be fully equipped for spill response and a specially trained and dedicated Environmental and Emergency Spill Response team will be appointed before the commencement of works on Site;
- Robust and appropriate Spill Response Plan and Environmental Emergency Plans will be implemented for the duration of the works; and
- A register will be kept of all hazardous substances either used on-site or expected to be present. The register shall be available at all times and shall include as a minimum: valid safety sheets; Health & Safety, environmental controls to be implemented when storing, handling, using and in the event of spillage of materials; emergency response procedures/precautions for each material; the Personal Protective Equipment (PPE) required when using the material.

Fuel and Chemical Storage

Appropriate storage facilities will be provided on Site. Areas of high risk include:

- Fuel and chemical storage;
- Refuelling Areas;
- Site Compound; and
- Waste storage areas.

If required, fuel, oils and chemicals will be stored on an impervious base within a bund, however, it is recommended that all fuel, oil and chemical storage will be off Site.

All tank, container and drum storage areas shall be rendered impervious to the materials stored therein. Bunds shall be designed having regard to EPA guidelines 'Storage and Transfer of Materials for Scheduled Activities' (2904). All tank and drum storage areas shall, as a minimum, be bunded to a volume not less than the greater of the following:

- 110% of the capacity of the largest tank or drum within the bunded area; or
- 25% of the total volume of substance that could be stored within the bunded area.

4.4.3.2 Mitigation 4: Silt and Sediment Control

During the Construction Phase, machinery such as diggers have the potential to stir up sediment, especially during rainy periods. This sedimentation has the potential to be transferred to the nearby Grand Canal in the absence of mitigation measures.

The following mitigation measures will prevent silt and sediment originating at the Site from entering the Grand Canal and thus any hydrologically connected European sites.

- Silt curtain will be installed along the southern boundary of the Site between the works area and the Grand Canal, prior to the commencement of works;

- An ECoW will be appointed to ensure best practices are carried out during the works; and
- Once silt curtains become functional, they will be checked regularly and maintained as necessary, in order to ensure continued effectiveness throughout the proposed works.

4.4.4 Operational Phase

4.4.4.1 Mitigation 5: Operational Phase Invasive Species Management

Certain plant species and their hybrids are listed as Invasive Alien Plant Species in Part 1 of the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011, as amended). In addition, soils and other material containing such invasive plant material, are classified in Part 3 of the Third Schedule as vector materials and are subject to the same strict legal controls.

Despite the measures identified in the OCEMP for the importation of only clean materials, there is the potential for the inadvertent import of invasive species to the Site. If established, there is a risk of further spread both within and out of the Site.

As such, it is recommended that any newly landscaped areas, particularly where infill materials and soils have been imported for soft landscaping, are assessed during the Operational Phase within the next botanical season for the presence of any inadvertently introduced invasive species, with particular focus on those listed on Schedule III of SI 477 of 2011. If invasive species are detected, an ISMP will be prepared, agreed with the Local Authority and implemented at the earliest possibility to limit the potential for further spread by ongoing operations at the Proposed Development

4.5 Monitoring

4.5.1 Construction Phase

During the Construction Phase, the following monitoring will be carried out by the construction contractor to ensure the implemented mitigation measures are maintained effectively:

- Surface water and silt control measures will be checked on a daily basis by the Site contractor, and on a monthly basis by a suitably qualified ECoW, to ensure they remain effective, and they will be checked more frequently during periods of moderate to heavy rainfall as deemed necessary;
- Invasive species and biosecurity measures, including those outlined for Japanese knotweed, will be checked regularly to ensure compliance and continued effectiveness. Detailed monitoring protocols will be specified in the JKMP.
- All mitigation measures outlined within this report and in the CEMP which accompanies this report will be monitored and adhered to by the designated persons, as set out in both reports.

4.5.2 Operational Phase

During the Operational Phase, the following monitoring is recommended to ensure the implemented mitigation measures have been effective:

- Annual invasive species surveys during the optimal botanical survey season of the newly landscaped areas for two consecutive years after completion of construction (i.e., if Proposed Development is completed in 2026, annual surveys will take place in 2027 and 2028). These surveys will be undertaken by a suitably qualified ecologist and will allow for early detection of any spread of invasive species (including Japanese knotweed) that may have occurred as a result of the Proposed Development. If Japanese knotweed, or any other Third Schedule species

are detected during these surveys, the Local Authority will be consulted and, where relevant, the NPWS, to control and remove any infestations and prevent further spread.

5 CONCLUSION

This NIS details the findings of the Stage 2 AA conducted to further examine the potential direct and indirect impacts of the Proposed Development planning application at White Heather Industrial Estate, South Circular Road, Saint James, Dublin 8, on the following European Sites:

- North Dublin Bay SAC (000206);
- South Dublin Bay SAC (000210);
- North Bull Island SPA (004006);
- South Dublin Bay and Tolka Estuary SPA (004024); and
- North-west Irish Sea SPA (004236).

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The AA investigated the potential direct and indirect effects of the proposed works, both during Construction and Operational Phases, on the integrity and QIs/SCIs of the above European Site, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European site(s), individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the QIs, SCIs and on the integrity and extent of the aforementioned European sites. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site.

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