Report for the purposes of Appropriate Assessment Screening

Carlisle Large-Scale Residential Development

Prepared by: Moore Group – Environmental Services

2 November 2022

On behalf of 1 Terenure Land Ltd.

Project Proponent	1 Terenure Land Ltd.
Project	Carlisle Large-Scale Residential Development
Title	Report for the purposes of Appropriate Assessment Screening Carlisle Large-Scale Residential Development

Project Number	21215	**Document Ref**	21215 Carlisle LRD AAS1 Rev4	
Revision	**Description**	**Author**		**Date**
Rev4	Amended Layout	G. O'Donohoe		2 November 2022
Moore Archaeological and Environmental Services Limited				

Table of Contents

Abbreviations

AA	Appropriate Assessment
EEC	European Economic Community
EPA	Environmental Protection Agency
EU	European Union
GIS	Geographical Information System
LAP	Local Area Plan
NHA	Natural Heritage Area
NIS	Natura Impact Statement
NPWS	National Parks and Wildlife Service
OSI	Ordnance Survey Ireland
pNHA	proposed Natural Heritage Area
SAC	Special Area of Conservation
SPA	Special Protection Area
SuDS	Sustainable Drainage System
WFD	Water Framework Directive

1. Introduction

1.1. General Introduction

This report for the purposes of Appropriate Assessment (AA) Screening has been prepared to support a Planning Application for the Proposed Development (described in Section 3 below). This report contains information required for the competent authority to undertake screening for Appropriate Assessment (AA) in respect of the construction and operation of a Large-Scale Residential Development (LRD) at Kimmage Road West, Dublin 12 (hereafter referred to as the Proposed Development) to determine whether it is likely individually or in combination with other plans and projects to have a significant effect on any European sites, in light of best scientific knowledge.

Having regard to the provisions of the Planning and Development Act 2000 – 2021 (the "Planning Acts") (section 177U), the purpose of a screening exercise under section 177U of the PDA 2000 is to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on a European site.

If it cannot be *excluded* on the basis of objective information that the proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site then it is necessary to carry out a Stage 2 appropriate assessment under section 177V of the Planning Acts.

When screening the project, there are two possible outcomes:

- the project poses no potential for a likely significant effect and as such requires no further assessment; and
- the project has potential to have likely significant effect (or this is uncertain) unless mitigation measures are applied, and therefore an AA of the project is necessary.

This report has been prepared by Moore Group - Environmental Services to enable the competent authority to carry out AA screening in relation to the Proposed Development. The report was compiled by Ger O'Donohoe (B.Sc. Applied Aquatic Sciences (GMIT, 1993) & M.Sc. Environmental Sciences (TCD, 1999)) who has 27 years' experience in environmental impact assessment and has completed numerous Appropriate Assessment Screening Reports and Natura Impact Statements on terrestrial and aquatic habitats for various development types.

1.2. Legislative Background - The Habitats and Birds Directives

Article 6 of the Habitats Directive is transposed into Irish Law inter alia by the Part XAB of the Planning Acts (section 177U and 177V) govern the requirement to carry out appropriate assessment screening and appropriate assessment, where required, per Section 1.1 above.

The Habitats Directive (Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora) is the main legislative instrument for the protection and conservation of biodiversity in the European Union (EU). Under the Habitats Directive, Member States are obliged to designate Special Areas of Conservation (SACs) which contain habitats or species considered important for protection and conservation in a EU context.

The Birds Directive (Council Directive 2009/147/EC on the conservation of wild birds), transposed into Irish law by the Bird and Natural Habitats Regulations 2011, as amended, is concerned with the long-term protection and management of all wild bird species and their habitats in the EU. Among other things, the Birds Directive requires that Special Protection Areas (SPAs) be established to protect migratory species and species which are rare, vulnerable, in danger of extinction, or otherwise require special attention.

SACs designated under the Habitats Directive and SPAs, designated under the Birds Directive, form a pan-European network of protected sites known as Natura 2000. The Habitats Directive sets out a unified system for the protection and management of SACs and SPAs. These sites are also referred to as European sites.

Articles 6(3) and 6(4) of the Habitats Directive set out the requirement for an assessment of proposed plans and projects likely to have a significant effect on Natura 2000 sites.

Article 6(3) establishes the requirement to screen all plans and projects and to carry out an appropriate assessment if required (Appropriate Assessment (AA)). Article 6(4) establishes requirements in cases of imperative reasons of overriding public interest:

> ***Article 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 subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the 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. Methodology

The Commission's methodological guidance (EC, 2002, 2018, 2021 see Section 2.1 below) promotes a four-stage process to complete the AA and outlines the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

Stages 1 and 2 deal with the main requirements for assessment under Article 6(3). Stage 3 may be part of Article 6(3) or may be a necessary precursor to Stage 4. Stage 4 is the main derogation step of Article 6(4).

Stage 1 Screening: This stage examines the likely effects of a project either alone or in combination with other projects upon a Natura 2000 site and considers whether it can be objectively concluded that these effects will not be significant. In order to screen out a project, it must be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a European site.

Stage 2 Appropriate Assessment: In this stage, there is a consideration of the impact of the project with a view to ascertain whether there will be any adverse effect on the integrity of the Natura 2000 site either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are predicted impacts, an assessment of the potential mitigation of those impacts is considered.

Stage 3 Assessment of Alternative Solutions: This stage examines alternative ways of implementing the project that, where possible, avoid any adverse impacts on the integrity of the Natura 2000 site.

Stage 4 Assessment where no alternative solutions exist and where adverse impacts remain: Where imperative reasons of overriding public interest (IROPI) exist, an assessment to consider whether compensatory measures will or will not effectively offset the damage to the sites will be necessary.

To ensure that the Proposed Development complies fully with the requirements of Article 6 of the Habitats Directive and all relevant Irish transposing legislation, Moore Group compiled this report to enable the competent authority to carry out AA screening in relation to the Proposed Development to determine whether the Proposed Development, individually or in combination with another plan or project will have a significant effect on a Natura 2000 site.

2.1. Guidance

This report has been compiled in accordance with guidance contained in the following documents:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 rev.).

- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2001); hereafter referred to as the EC Article 6 Guidance Document.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC Environment Directorate-General, 2000); hereafter referred to as MN2000.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC, 2018).
- Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (EC, 2021).
- 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 (EC, 2021).
- Office of the Planning Regulator (OPR) Practice Note PN01 Appropriate Assessment Screening for Development Management (OPR, 2021).

2.2. Data Sources

Sources of information that were used to collect data on the Natura 2000 network of sites, and the environment within which they are located, are listed below:

- The following mapping and Geographical Information Systems (GIS) data sources, as required:
    - National Parks & Wildlife (NPWS) protected site boundary data;
    - Ordnance Survey of Ireland (OSI) mapping and aerial photography;
    - OSI/Environmental Protection Agency (EPA) rivers and streams, and catchments;
    - Open Street Maps;
    - Digital Elevation Model over Europe (EU-DEM);
    - Google Earth and Bing aerial photography 1995-2022;
- Online data available on Natura 2000 sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie including:
    - Natura 2000 - Standard Data Form;
    - Conservation Objectives;
    - Site Synopses;
- National Biodiversity Data Centre records;
    - Online database of rare, threatened and protected species;
    - Publicly accessible biodiversity datasets.
- Status of EU Protected Habitats in Ireland. (National Parks & Wildlife Service, 2019); and
- Relevant Development Plans;
    - Dublin City Development Plan 2022-2028

3. Description of the Proposed Development

The proposed Large-Scale Residential Development will consist of the construction of 5 no. blocks of development and will range in height up to 6 storeys. This will provide 208 no. residential units (104 no. 1 beds and 104 no. 2 beds) all of which will have associated private balconies/terraces. Car, cycle and motorbike parking will be located at undercroft and surface level. Vehicular/pedestrian/cyclist access is provided off Kimmage Road West via the existing Ben Dunne Gym access route. All associated site development works, open spaces, landscaping, boundary treatments, plant areas, waste management areas, and services (including ESB substations) shall be provided.

Permission was granted, under ABP 313043 on the 22/09/2022, for a Strategic Housing Development (SHD) on the subject site comprising 208 no. apartment units in 5 no. blocks. The current proposed Large Residential Development (LRD) application provides the same layout and quantum of units as this permitted development. The proposed LRD *lighting layout* is the same as permitted in the SHD application.

A Habitat Survey of the site on 3 September 2021 established that the predominant habitat is Improved grassland with no third schedule invasive species present. Surface water goes to ground and once operational, wastewater will be treated appropriately.

Figure 1 shows the Proposed Development location and Figure 2 shows a detailed view of the Proposed Development boundary on recent aerial photography. Figure 3 shows the layout of the Proposed Development.

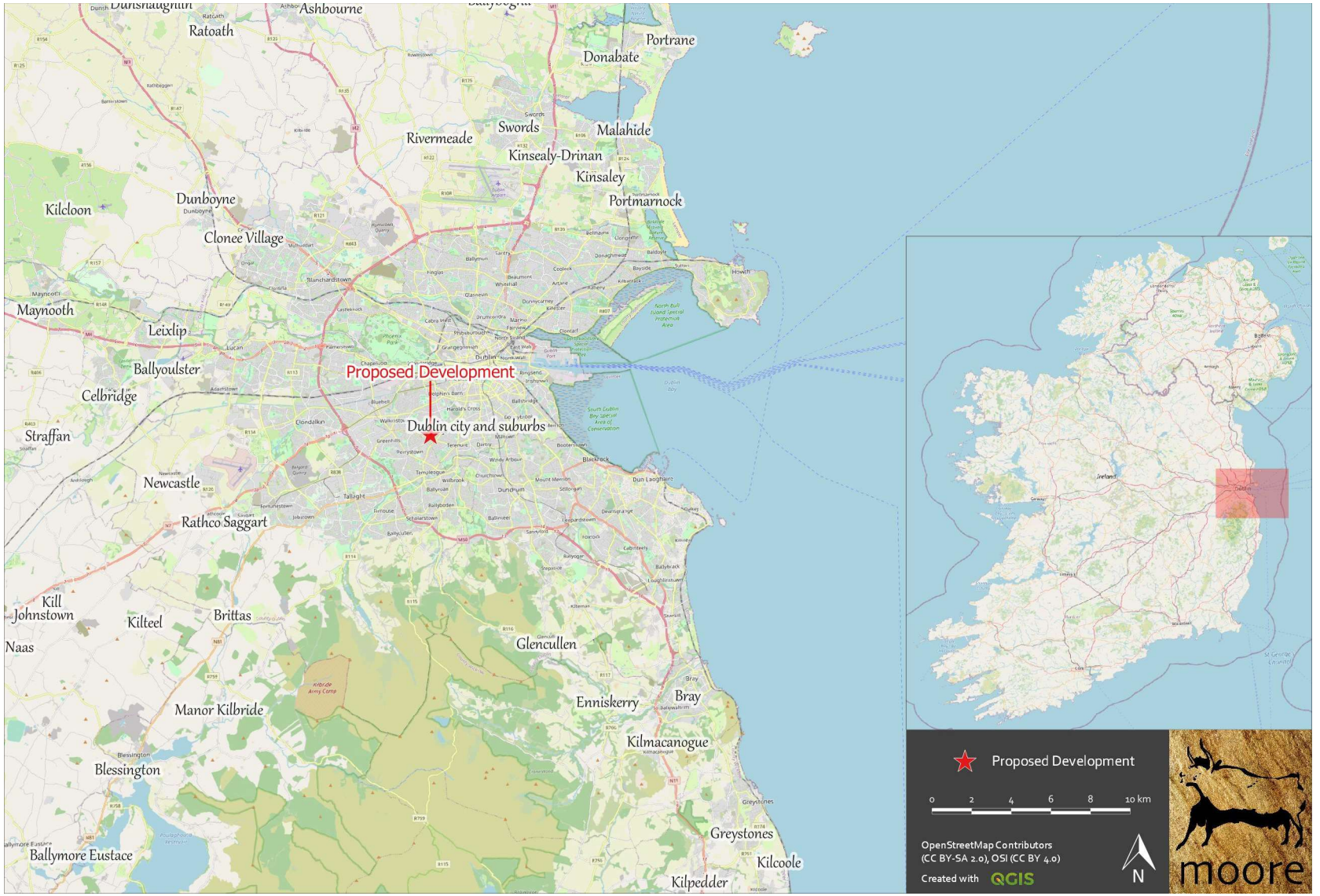

Figure 1. Showing the Proposed Development location at Kimmage Road West, Dublin 12.

Figure 2. Showing the Proposed Development boundary on recent aerial photography. (Note; the site boundary continues west along Kimmage Rd. West to facilitate connection to municipal sewer)

Figure 3. Plan of the Proposed Development. (Note; the site boundary continues west along Kimmage Rd. West to facilitate connection to municipal sewer)

4. Identification of Natura 2000 Sites

4.1. Description of Natura Sites Potentially Affected

A Zone of Influence (ZoI) of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. In accordance with the OPR Practice Note, PN01, the ZoI should be established on a case-by-case basis using the Source- Pathway-Receptor framework.

The European Commission's "*Assessment of plans and projects in relation to Natura 2000 sites guidance on Article 6(3) and (4) of the Methodological Habitats Directive 92/43/EEC*" published 28 September 2021 states at section 3.1.3:

Identifying the Natura 2000 sites that may be affected should be done by taking into consideration all aspects of the plan or project that could have potential effects on any Natura 2000 sites located within the zone of influence of the plan or project. This should take into account all of the designating features (species, habitat types) that are significantly present on the sites and their conservation objectives. In particular, it should identify:

- *any Natura 2000 sites geographically overlapping with any of the actions or aspects of the plan or project in any of its phases, or adjacent to them;*
- *any Natura 2000 sites within the likely zone of influence of the plan or project Natura 2000 sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, including as regards the use of natural resources (e.g. water) and various types of waste, discharge or emissions of substances or energy;*
- *Natura 2000 sites in the surroundings of the plan or project (or at some distance) which host fauna that can move to the project area and then suffer mortality or other impacts (e.g. loss of feeding areas, reduction of home range);*
- *Natura 2000 sites whose connectivity or ecological continuity can be affected by the plan or project.*

The range of Natura 2000 sites to be assessed, i.e. the zone in which impacts from the plan or project may arise, will depend on the nature of the plan or project and the distance at which effects may occur. For Natura 2000 sites located downstream along rivers or wetlands fed by aquifers, it may be that a plan or project can affect water flows, fish migration and so forth, even at a great distance. Emissions of pollutants may also have effects over a long distance. Some projects or plans that do not directly affect Natura 2000 sites may still have a significant impact on them if they cause a barrier effect or prevent ecological linkages. This may happen, for example, when plans affect features of the landscape that connect Natura 2000 sites or that may obstruct the

movements of species or disrupt the continuity of a fluvial or woodland ecosystem. To determine the possible effects of the plan or project on Natura 2000 sites, it is necessary to identify not only the relevant sites but also the habitats and species that are significantly present within them, as well as the site objectives.

The Zone of Influence may be determined by considering the Proposed Development's potential connectivity with European sites, in terms of:

- Nature, scale, timing and duration of all aspects of the proposed works and possible impacts, including the nature and size of excavations, storage of materials, flat/sloping sites;
- Distance and nature of potential pathways (dilution and dispersion; intervening 'buffer' lands, roads etc.); and
- Location of ecological features and their sensitivity to the possible impacts.

The potential for source pathway receptor connectivity is firstly identified through GIS interrogation and detailed information is then provided on sites with connectivity. European sites that are located within a potential Zone of Influence of the Proposed Development are listed in Table 1 and presented in Figures 4 and 5, below. Spatial boundary data on the Natura 2000 network was extracted from the NPWS website (www.npws.ie) on 2 November 2022. This data was interrogated using GIS analysis to provide mapping, distances, locations and pathways to all sites of conservation concern including pNHAs, NHA and European sites.

Table 1 European Sites located within the potential Zone of Influence[1] of the Proposed Development.

Site Code	Site name	Distance (km)[2]
000210	South Dublin Bay SAC	6.31
000206	North Dublin Bay SAC	9.50
004006	North Bull Island SPA	9.49
004024	South Dublin Bay and River Tolka Estuary SPA	6.33

The nearest European sites to the Proposed Development are associated with Dublin Bay and include North Dublin Bay SAC, and South Dublin Bay and River Tolka Estuary SPA, 6.31km and 6.33km to the east respectively.

Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load.

There is indirect connectivity to Dublin Bay via the Ringsend Wastewater Treatment Plant.

[1] All European sites potentially connected irrespective of the nature or scale of the Proposed Development.
[2] Distances indicated are the closest geographical distance between the Proposed Development and the European site boundary, as made available by the NPWS. Connectivity along hydrological pathways may be significantly greater.

The Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the European sites in the vicinity of the Proposed Development are provided in Table 2 below.

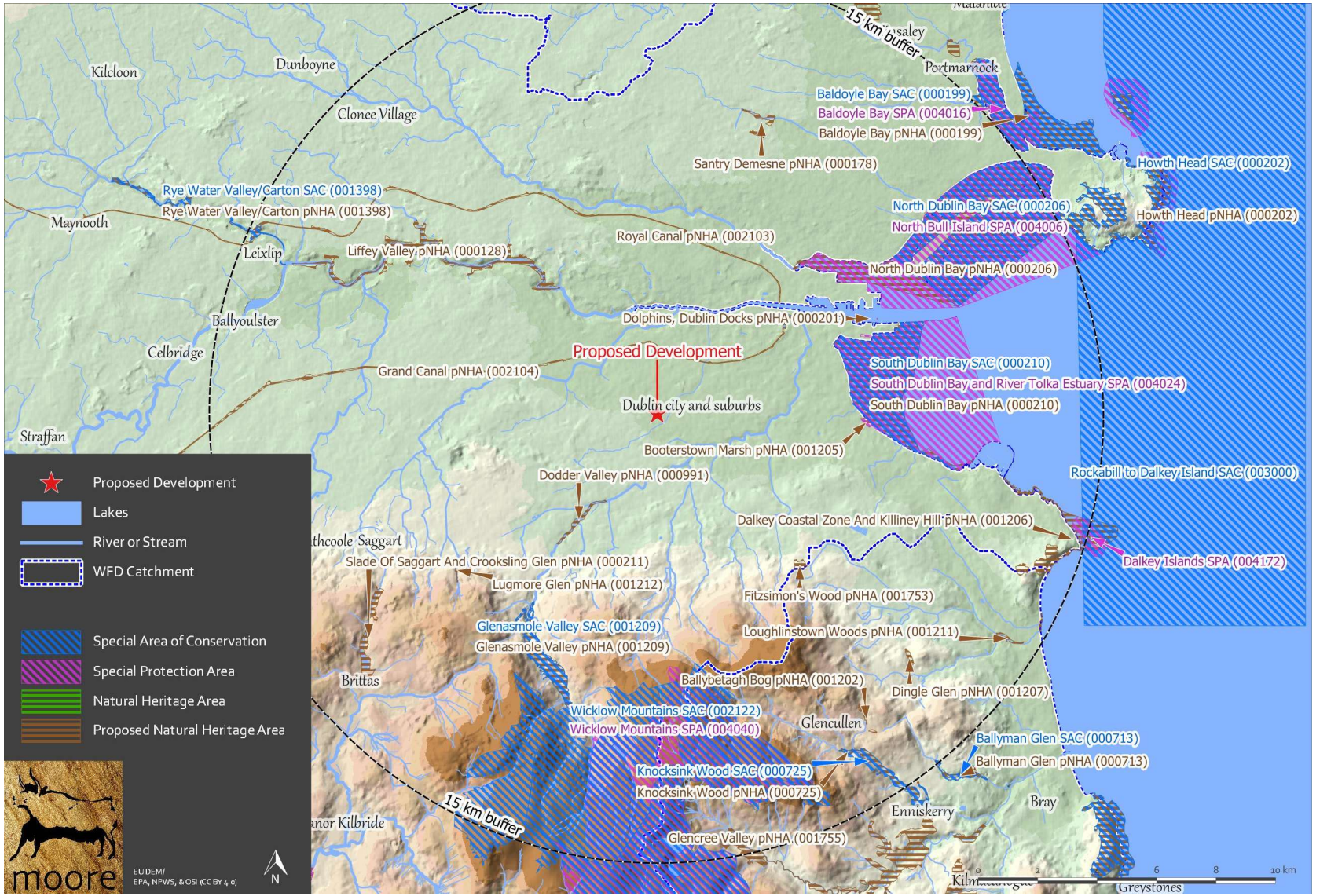

Figure 4. Showing European sites and NHAs/pNHAs within the wider Potential Zone of Influence of the Proposed Development.

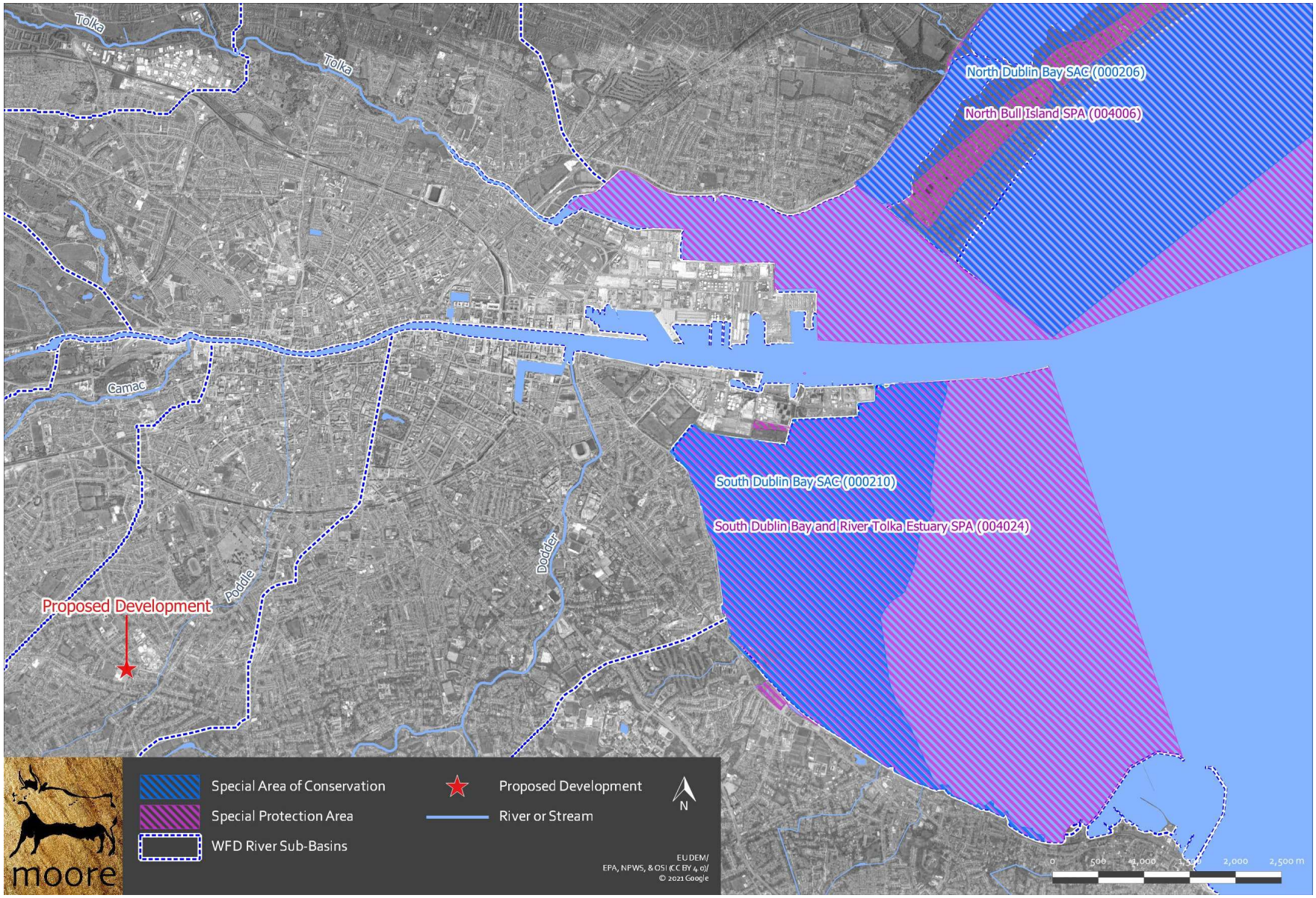

Figure 5. Detailed view of European sites in the nearer Potential Zone of Influence of the Proposed Development.

Table 2 Identification of relevant European sites using Source-Pathway-Receptor model and compilation of information QIs and conservation objectives.

European site name & Site code	Location Relative to the Proposed Development Site	Connectivity – Source-Pathway-Receptor	Considered further in Screening – Y/N
South Dublin Bay SAC (000210) [1140] Tidal Mudflats and Sandflats [1210] Annual vegetation of drift lines [1310] Salicornia and other annuals colonising mud and sand [2110] Embryonic shifting dunes NPWS (2013) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	6.31km to the east of the Proposed Development	No Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load.	N
North Dublin Bay SAC (000206) 1140 Mudflats and sandflats not covered by seawater at low tide 1210 Annual vegetation of drift lines 1310 *Salicornia* and other annuals colonising mud and sand 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) 1395 Petalwort *Petalophyllum ralfsii* 1410 Mediterranean salt meadows (*Juncetalia maritimi*) 2110 Embryonic shifting dunes 2120 Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes) 2190 Humid dune slacks NPWS (2013) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	9.50km to the northeast of the Proposed Development	No Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load.	N
North Bull Island SPA (004006) A046 Light-Bellied Brent Goose *Branta bernicla hrota* A048 Shelduck *Tadorna tadorna*	9.49km to the northeast of the Proposed Development	No Surface water currently goes to ground and so there is no connectivity with the European sites of Dublin Bay. In terms of the operational phase,	

European site name & Site code	Location Relative to the Proposed Development Site	Connectivity – Source-Pathway-Receptor	Considered further in Screening – Y/N
A052 Teal Anas *crecca* A054 Pintail *Anas acuta* A056 Shoveler *Anas clypeata* A130 Oystercatcher *Haematopus ostralegus* A140 Golden Plover *Pluvialis apricaria* A141 Grey Plover *Pluvialis squatarola* A143 Knot *Calidris canutus* A144 Sanderling *Calidris alba* A149 Dunlin *Calidris alpina alpina* A156 Black-tailed Godwit *Limosa limosa* A157 Bar-tailed Godwit *Limosa lapponica* A160 Curlew *Numenius arquata* A162 Redshank *Tringa totanus* A169 Turnstone *Arenaria interpres* A179 Black-headed Gull *Chroicocephalus ridibundus* A999 Wetlands NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.		wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load. No Due to distance and the lack of any relevant ex-situ factors of significance to these species or habitat.	
South Dublin Bay and River Tolka Estuary SPA (004024) A046 Light-Bellied Brent Goose *Branta bernicla hrota* A130 Oystercatcher *Haematopus ostralegus* A137 Ringed Plover *Charadrius hiaticula* A141 Grey Plover *Pluvialis squatarola* A143 Knot *Calidris canutus* A144 Sanderling *Calidris alba* A149 Dunlin *Calidris alpina alpina* A157 Bar-tailed Godwit *Limosa lapponica*	6.33km to the east of the Proposed Development	No Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load. No	N

European site name & Site code	Location Relative to the Proposed Development Site	Connectivity – Source-Pathway-Receptor	Considered further in Screening – Y/N
A162 Redshank *Tringa totanus* A179 Black-headed Gull *Chroicocephalus ridibundus* A192 Roseate Tern *Sterna dougallii* A193 Common Tern *Sterna hirundo* A194 Arctic Tern *Sterna paradisaea* A999 Wetlands NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.		Due to distance and the lack of any relevant ex-situ factors of significance to these species or habitat.	

4.2. Ecological Network Supporting Natura 2000 Sites

A concurrent GIS analysis of the proposed Natural Heritage Areas (pNHA) and designated Natural Heritage Areas (NHA) in terms of their role in supporting the species using Natura 2000 sites was undertaken. It was assumed that these supporting roles mainly related to mobile fauna such as mammals and birds which may use pNHAs and NHAs as "stepping stones" between Natura 2000 sites.

Article 10 of the Habitats Directive and the Habitats Regulations 2011 place a high degree of importance on such non-Natura 2000 areas as features that connect the Natura 2000 network. Features such as ponds, woodlands and important hedgerows were taken into account during the preparation of this AA Screening report .

There are no other areas of conservation concern that would be affected by the Proposed Development.

The NHAs and pNHAs identified in Figure 4 are located outside the Zone of Influence. There are no areas of supporting habitat that will be affected by the Proposed Development.

5. Identification of Potential Impacts & Assessment of Significance

The Proposed Development is not directly connected with or necessary to the management of the sites considered in the assessment and therefore potential impacts must be identified and considered.

5.1. Assessment of Likely Significant Effects

Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load.

The consideration of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the Proposed Development are presented in Table 3.

Table 3 Assessment of Likely Significant Effects.

Identification of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the project.	
Impacts:	**Significance of Impacts:**
Construction phase e.g. Vegetation clearance Demolition Surface water runoff from soil excavation/infill/landscaping (including borrow pits) Dust, noise, vibration Lighting disturbance Impact on groundwater/dewatering Storage of excavated/construction materials Access to site Pests	None The Proposed Development site is located within the boundary of a field of improved grassland. Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay.
Operational phase e.g. Direct emission to air and water Surface water runoff containing contaminant or sediment Lighting disturbance	All foul and surface water runoff, once the facility is operational, will be contained on site and discharged to urban drainage systems. There is no real likelihood of any significant effects on European Sites in the wider catchment area.

Noise/vibration Changes to water/groundwater due to drainage or abstraction Presence of people, vehicles and activities Physical presence of structures (e.g. collision risks) Potential for accidents or incidents	The facility is located at a distance of removal such that there will be no disturbance to qualifying interest species in any European sites.
In-combination/Other	No likely significant in-combination effects are identified.
Describe any likely changes to the European site:	
Examples of the type of changes to give consideration to include: Reduction or fragmentation of habitat area Disturbance to QI species Habitat or species fragmentation Reduction or fragmentation in species density Changes in key indicators of conservation status value (water quality etc.) Changes to areas of sensitivity or threats to QI Interference with the key relationships that define the structure or ecological function of the site Climate change	None. The Proposed Development site is not located adjacent or within a European site, therefore there is no risk of habitat loss or fragmentation or any effects on QI habitats or species directly or ex-situ.
Are 'mitigation' measures necessary to reach a conclusion that likely significant effects can be ruled out at screening?	
No	While best practice construction methods may be included these are not required to avoid or reduce any effects on a European site. These measures are not relied upon to reach a conclusion of no likely significant effects on any European site.

On the basis of the information supplied, which is considered adequate to undertake a screening determination and having regard to:

- the nature and scale of the proposed development,

- the intervening land uses and distance from European sites,
- the lack of direct connections with regard to the Source-Pathway-Receptor model,

It may be concluded that the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on the above listed European sites or any other European site, in view of the said sites' conservation objectives.

5.2. Assessment of Potential In-Combination Effects

In-combination effects are changes in the environment that result from numerous human-induced, small-scale alterations. In-combination effects can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

As part of the Screening for an Appropriate Assessment, in addition to the Proposed Development, other relevant plans and projects in the area must also be considered at this stage. This step aims to identify at this early stage any possible significant in-combination effects of the Proposed Development with other such plans and projects on European sites.

A review of the National Planning Application Database was undertaken. The first stage of this review confirmed that there were no data gaps in the area where the Proposed Development is located. The database was then queried for developments granted planning permission within 150m of the Proposed Development within the last three years, these are presented in Table 4 below.

Table 4.Planning applications granted permission in the vicinity of the Proposed Development.

Planning Ref.	Description of development	Comments
3962/18	The development will consist of a 23sq.m single storey extension to rear of existing Pilot Plant.	No potential for in-combination effects given the scale and location of the project.
SD18B/0040	Single and two storey extension to the rear and alterations to existing front garage elevation, all including associated site works to an existing semi-detached two storey dwelling.	No potential for in-combination effects given the scale and location of the project.
2293/19	Permission for development at LEO Pharma, 285 Cashel Road, Crumlin, Dublin D12 E923. The development will consist of the construction of a two storey extension to the side of the existing Mobile Tank Terminal Building.	No potential for in-combination effects given the scale and location of the project.
2961/19	Permission for Conversion of existing attic space comprising of modification of existing roof structure, construction of A-style roof dormer to the side e/w window, new access stairs and 2no. roof windows to the rear.	No potential for in-combination effects given the scale and location of the project.
3057/19	Permission to construct dormer type window to rear of main roof for attic studio use.	No potential for in-combination effects given the scale and location of the project.
3153/19	The development will consist of the construction of 130m2 to an existing boiler house to include 2 no. boiler flues; a single-storey stand-alone nitrogen generator building of 30m2; a single storey extension of 60m2 to an existing paraffin storage building; to	No potential for in-combination effects given the scale and location of the project.

Planning Ref.	Description of development	Comments
	provide a steel support system to an existing roof to carry 2 no. chillers and associated pipe work; and ancillary siteworks as part of Leo Pharma's Utilities Project.	
4708/19	Construction of a 'granny flat' to side and rear of existing house. The work will include the conversion of the existing garage to side and construction of new ground floor extension to rear and also widening of the entrance gates to driveway at front.	No potential for in-combination effects given the scale and location of the project.
WEB1002/19	The development will consist of refurbishment of existing roof including upgrade of existing flat roof to pitched roof and provision of two rear facing rooflights, the demolition of existing single-story rear extension, the provision of a new single-story rear extension including 1 rooflight, general internal alterations, refurbishment and associated site works.	No potential for in-combination effects given the scale and location of the project.
SD19A/0124	Retention of change of use of a detached two storey garage from use as a garage/store to use as a one bed residential unit and associated ground works; vehicular entrance to be retained.	No potential for in-combination effects given the scale and location of the project.
2337/20	Planning permission to build a single storey extension to the side of existing dwelling.	No potential for in-combination effects given the scale and location of the project.
3556/20	The development consists of a canteen extension to the existing north east elevation of Building O at first floor level located over an existing flat roof. Works also comprise of alterations and diversion of existing external services, reconfiguration of external staircases, platforms, and associated site works.	No potential for in-combination effects given the scale and location of the project.
3762/20	The development will consist of a 48sq.m single storey extension to front of existing single storey warehouse building with new cladding to front elevation of existing single storey warehouse building .	No potential for in-combination effects given the scale and location of the project.
WEB1901/20	A second storey extension over a previously approved single storey extension to the side of existing dwelling.	No potential for in-combination effects given the scale and location of the project.
WEB1954/20	Retention and completion of first floor extension to rear of dwelling	No potential for in-combination effects given the scale and location of the project.
WEB1647/21	Remove part existing front wall for creation of new vehicular access for car parking space in existing front garden with dropped kerb.	No potential for in-combination effects given the scale and location of the project.

The Dublin City Development Plan in complying with the requirements of the Habitats Directive requires that all Projects and Plans that could affect the Natura 2000 sites in the same potential Zone of Influence of the Proposed Development site would be initially screened for Appropriate Assessment and if requiring Stage 2 AA, that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts. In this way any, in-combination impacts with Plans or Projects for the proposed development area and surrounding townlands in which the proposed development site is located, would be avoided.

The listed developments have been granted permission in most cases with conditions relating to sustainable development by the consenting authority in compliance with the relevant Local Authority Development Plan and in compliance with the Local Authority requirement for regard to the Habitats Directive. The development cannot have received planning permission without having met the consenting authority requirement in this regard. There are no predicted in-combination effects given that it is predicted that the Proposed Development will have no effect on any European site.

There are no predicted in-combination effects given that the reasons discussed in the 'Comments' column of Table 4 above and given that the Proposed Development is unlikely to have any adverse effects on any European sites.

Any new applications for the Proposed Development area will be assessed on a case by case basis *initially* by Dublin City Council which will determine the requirement for AA Screening as per the requirements of Article 6(3) of the Habitats Directive.

6. Conclusion

Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load.

There are no predicted effects on any European sites given:

- The distance between the Proposed Development and any European Sites, approximately 6km;
- The lack of direct connectivity between the Proposed Development and any hydrological pathways; there are no watercourses within the Proposed Development boundary and there is no direct connectivity between the Proposed Development site and any watercourses that lead to Dublin Bay;
- The Proposed Development is to be connected to the existing public sewer network for the treatment of wastewater.
- There are no predicted emissions to air, water or the environment during the construction or operational phases that would result in significant effects.

It has been objectively concluded by Moore Group Environmental Services that:

1. The Proposed Development is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.
2. The Proposed Development is unlikely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.
3. The Proposed Development, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.
4. It is possible to conclude that significant effects can be excluded at the screening stage.

It can be *excluded*, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a European site.

An appropriate assessment is not, therefore, required.

A final determination will be made by the consenting authority in this regard.

7. References

Department of the Environment, Heritage and Local Government (2010) Guidance on Appropriate Assessment of Plans and Projects in Ireland (as amended February 2010).

European Commission (2000) Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

European Commission Environment DG (2002) Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43EEC. European Commission, Brussels.

European Commission (2007) Guidance document on Article 6(4) of the 'Habitats Directive '92/43/EEC: Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interests, compensatory measures, overall coherence and opinion of the Commission. European Commission, Brussels.

European Commission (2018) Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

NPWS (2019) The Status of EU Protected Habitats and Species in Ireland. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin.

NPWS (2022) National Parks and Wildlife Service Metadata available online at https://www.npws.ie/maps-and-data

Office-of-the-Planning-Regulator (2021) Appropriate Assessment Screening for Development Management OPR Practice Note PN01. March 2021