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South Dublin County Council
Tymon Park Inter-Generational Centre

Appropriate Assessment Screening Report

PROJECT NAME: Tymon Park Inter-Generational Centre

REPORT NAME: Appropriate Assessment Screening Report

Document Control Sheet	
Document Reference	11089_AA Screening
Report Status	For Client Review
Report Date	February 2021
Current Revision	A02
Client:	South Dublin County Council
Client Address:	County Hall, Tallaght, Dublin 24, D24 YNN5
Project Number	11089

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Revision	Description	Author:	Date	Reviewed By:	Date	Authorised by:	Date
A01	For Client Review	ÁS	19/02/2021	LK	19/02/2021	LK	19/02/2021
A02	Final Version	Á.S	05/03/2021	LK	08/03/2021	LK	08/02/2021

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1.0 INTRODUCTION

This report forms an Appropriate Assessment (AA) Screening Report for the development of an inter-generational centre at Tymon Park in Co. Dublin.

The purpose of this Screening Report is to inform the AA process, which is carried out by the competent authority (in this case South Dublin County Council). Appropriate Assessment is an assessment of whether a plan or project, alone and/or in-combination with other plans or projects, may have significant effects on a European site, collectively known as the Natura 2000 network, in view of the site's conservation objectives.

The project design has sought to, in as far as possible, avoid impacts on European sites. This report considers the final design. It determines if direct, indirect and/or in-combination effects could arise, or if there is uncertainty regarding potential effects.

This report provides information to assist the competent authority in undertaking a Screening Assessment of the proposed development and was informed by a desktop study undertaken by competent ecologists at TOBIN Consulting Engineers in November 2020 (Áine Sands B.Sc.), and senior reviewed by TOBIN Senior Ecologist, Laura Kennedy (M.Sc.).

2.0 THE APPROPRIATE ASSESSMENT PROCESS

The AA process is an assessment of the potential for likely significant effects or negative effects of a plan or project, alone and/or in-combination with other plans or projects, on the conservation objectives of a European site(s). The Natura 2000 network is made up of European sites including Special Protection Areas (SPAs), established under the EU Birds Directive (2009/147/EC) (more generally referred to as the 'Birds Directive') and Special Areas of Conservation (SACs), established under the EU Habitats Directive (92/43/EEC) (more generally referred to as the 'Habitats Directive'). The Natura 2000 network helps provide for the protection and long-term survival of Europe's most valuable and threatened species and habitats.

The Screening Stage of the AA process identifies any likely significant effects upon European sites from the proposed development alone or in-combination with other projects or plans. A series of questions are asked during the Screening Stage of the AA process to determine:

- whether a plan or project can be excluded from AA requirements because it is directly connected with or necessary to the management of a European site; and
- whether the project or plan will have a potentially significant effect on a European site, either alone or in-combination with other projects or plans, in view of the site's conservation objectives or if residual uncertainty exists regarding potential impacts.

2.1 Legislative Context

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as the 'Habitats Directive', provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000 network.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites (Annex 1.1). Article 6(3) establishes the requirement for AA:

> '*Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the 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.'*

Article 6(4) states:

> *'If, in spite of a negative assessment of the implications for the [Natura 2000] site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'*

The provision for an AA is transposed into Irish law by Part XAB of the Planning and Development Act 2010 (as amended). Section 177U (4) of the said Acts provides for screening for Appropriate Assessment as follows:

> *'The competent authority shall determine that an appropriate assessment of [...] a proposed development [...] is required 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.'*

Section 177U (5) provides as follows:

> *'The competent authority shall determine that an appropriate assessment of a [...] proposed development, [...], is not required if 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 AA should be based on best scientific knowledge and the competent authority should ensure that expertise such as ecological, geological, and hydrological are utilised, where relevant.

The Court of Justice of the European Union (CJEU) has made a number of rulings in relation to AA, regarding when it is required, its purpose, and the standards it should meet. Consideration has been given to the evolution in interpretation and application of directives and national legislation arising from jurisprudence of the European and Irish courts, in respect of Article 6 of the Habitats Directive.

2.2 Guidance

This report has been carried out using the following guidance (and relevant case law):

- Communication from the Commission on the Precautionary Principle. Office for Official Publications of the European Communities, Luxembourg (European Commission [EC] 2000)[1].
- Nature and biodiversity cases: Ruling of the European Court of Justice. Office for Official Publications of the European Communities, Luxembourg (EC, 2006)[2].
- Circular L8/08 – Water Services Investment and Rural Water Programmes – Protection of Natural Heritage and National Monuments. Department of Environment, Heritage and Local Government (DoEHLG, 2008)[3].
- Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC. European Commission (EC, 2018)[4].
- Interpretation Manual of European Union Habitats. Version EUR 28. European Commission (EC, 2013)[5].
- Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government (DoEHLG, 2010)[6].
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission. Office for Official Publications of the European Communities, Luxembourg (EC, 2007)[7].
- 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, Office for Official Publications of the European Communities, Luxembourg (EC, 2001)[8].

Definitions of conservation status, integrity and significance used in this assessment are defined in accordance with '*Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*' (EC, 2018):

- Favourable conservation status (FCS) can only be defined and achieved at the level of the natural range of a species or a habitat type. A broad conservation objective aiming at achieving FCS can therefore only be considered at an appropriate level, such as for example the national, biogeographical or European level. The conservation measures have to correspond to the ecological requirements of the natural habitat types in Annex I and of the species in Annex II present on the site. The ecological requirements of those natural habitat types and species involve all the ecological needs which are deemed necessary to ensure the conservation of the habitat types and species. They can only be defined on a case-by-case basis and using scientific knowledge;

[1] Communication from the Commission on the Precautionary Principle: https://op.europa.eu/en/publication-detail/-/publication/21676661-a79f-4153-b984-aeb28f07c80a/language-en
[2] Nature and Biodiversity Cases: https://friendsoftheirishenvironment.org/images/EULaw/ecj_rulings_en.pdf
[3] Circular L8/08: https://www.npws.ie/sites/default/files/general/circular-L8-08.pdf
[4] European Commission (2018) https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/Provisions_Art_6_nov_2018_en.pdf
[5] Interpretation Manual: https://ec.europa.eu/environment/nature/legislation/habitatsdirective/docs/Int_Manual_EU28.pdf
[6] Appropriate Assessment of Plans and Projects: https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf
[7] Guidance Document on Article 6 (4): https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf
[8] Assessment of plans and projects significantly affecting Natura 2000 sites: https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

- The integrity of a European site is defined as the coherent sum of the site's ecological structure, function, and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated.
- Significant effect should be determined in relation to the specific features and environmental conditions of the protected site concerned by the plan or project, taking particular account of the site's conservation objectives and ecological characteristics.

2.3 Stages Involved in the Appropriate Assessment Process

There are potentially four stages in the AA process; the result of each stage determines the requirement for assessment under the next.

Stage 1: Screening / Test of Significance

This process identifies the likely significant effects upon a European site from a proposed project or plan. Its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project which is not directly connected with or necessary to the management of the site as a European site, individually or in-combination with other plans or projects is likely to have a significant effect upon the European site, in view of its conservation objectives. A project may be 'screened-in' if there is a possibility or uncertainty of possible effects upon the European site, requiring a Stage Two AA. If there is no evidence to suggest significant effects due to the proposed plan or development the project is 'screened-out' from further assessment.

Stage 2: Appropriate Assessment

Consideration is given if potential impact(s) of a project or plan could cause likely significantly effects to the integrity of surrounding European sites, 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 likely significant effects have been identified, an assessment of the potential mitigation to avoid/reduce such impacts is required. A NIS is often produced at this stage to inform the AA which is undertaken by the competent authority. This stage is required where uncertainty of effect arises, or a potential effect has been defined which requires further procedures/mitigation to remove uncertainty of a defined impact.

Stage 3: Assessment of Alternatives

This stage of the potential process arises where adverse effects on the integrity of a European site cannot be excluded and examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site. However, in circumstances where there will not be any adverse effects on any European site, the developer places no reliance upon this third stage of the process in the context of this application for planning permission for the proposed development.

Stage 4: Assessment Where Adverse Effects Remain

This is the derogation process of Article 6(4), which examines whether there are imperative reasons of overriding public interest [IROPI] for allowing a project to proceed where adverse effects on the integrity of a European site have been predicted. Compensatory measures must be proposed and assessed as part of this stage and the EU Commission must be informed of the

compensatory measures. Again, the developer places no reliance upon this stage of the process in the context of the application for planning permission for the proposed development.

3.0 SCREENING ASSESSMENT

This report comprises a Screening AA of the proposed development. Potential impacts on European sites arising from the proposed development are considered.

3.1 Description of the Proposed Development

South Dublin County Council are proposing the development of an Inter-Generational Centre in Tymon Park in Co. Dublin. The location of the proposed development site is shown in Figure 3-1 and the proposed site layout shown in Figure 3-2 below.

The proposed development site is located immediately adjacent to the existing Tymon Park carpark to the east and St. Judes GAA Club to the west. The surrounding lands comprise a mixture of amenity grassland and commercial developments. A number of small artificial lakes occur in proximity to the proposed development site. The site will be accessed via Wellington Lane located approximately 70m east of the proposed development site.

The proposed development will include a building (the proposed centre) with a footprint area of 190m^2 and associated terraced and paved areas around the building approximately 450m^2 in size. The proposed centre will include multi-functional community space which can be divided by a partition into smaller self-contained rooms, if required.

3.1.1 Construction Phase

It is anticipated that the proposed construction works will commence in Q2 of 2022 for an approximate duration of 12 months.

Normal works hours during the construction phase are expected to be Monday to Friday 08:00 to 17:00 hours. During certain stages of the construction phase there is potential that some work will have to be carried out outside of normal working hours, however, this will be kept to a minimum.

Construction personnel will access the site via Wellington Lane and the existing Tymon Park carpark situated adjacent to the site. The construction compound will be located within the carpark.

The proposed construction works will largely follow the following programme:

- The proposed construction works will commence with the demarcation of the construction works area, site clearance and removal of existing vegetation and site levelling to prepare the works area.
- Stripping of topsoil and excavation activities – all excavated material will be stockpiled within the demarcated site boundary. Excavated material will either be reused onsite or disposed of offsite in accordance with Waste Legislation.
- Foundation works which will include the pouring and setting of concrete within the development site.
- Structural steelwork erection and construction.
- Connection to existing surface water and foul water networks and installation of other associated infrastructure.
- Cladding and building finishing works.

- The reinstatement of disturbed lands.

3.1.2 Operational Phase

During the operational phase, the proposed centre will operate broadly in line with the parks opening hours. The proposed centre will be multifunctional and will host an array of activities/groups such as the following:

- Active aged and age friendly groups,
- Parent and child groups,
- Yoga and Pilates classes and keep-fit groups,
- Indoor or outdoor performances,
- Friends of Tymon Park, Tidy Town and residents groups,
- Study groups, grind classes and education groups,
- Reading, knitting, bridge and other card or board games groups, and/or
- Other small or medium community groups or meetings.

As noted, foul sewer will connect to the existing network located to the south of the carpark. All surface water will be attenuated via a proposed green roof and soakaway.

New external lighting will be installed on the proposed centre, at the forecourt towards the carpark and at the service terrace towards the rear of the centre. Pond/flood lighting is also proposed.

A Landscape Plan will be included with the planning application and is proposing the planting of pollinator friendly wildflower strips and amenity picnic areas around the existing artificial lake. Pollinator hedging is also proposed to the east of the proposed centre within the existing carpark area. The proposed landscaping will ensure the proposed centre is integrated into the parkland setting.

Figure 3-1: Site Location Map

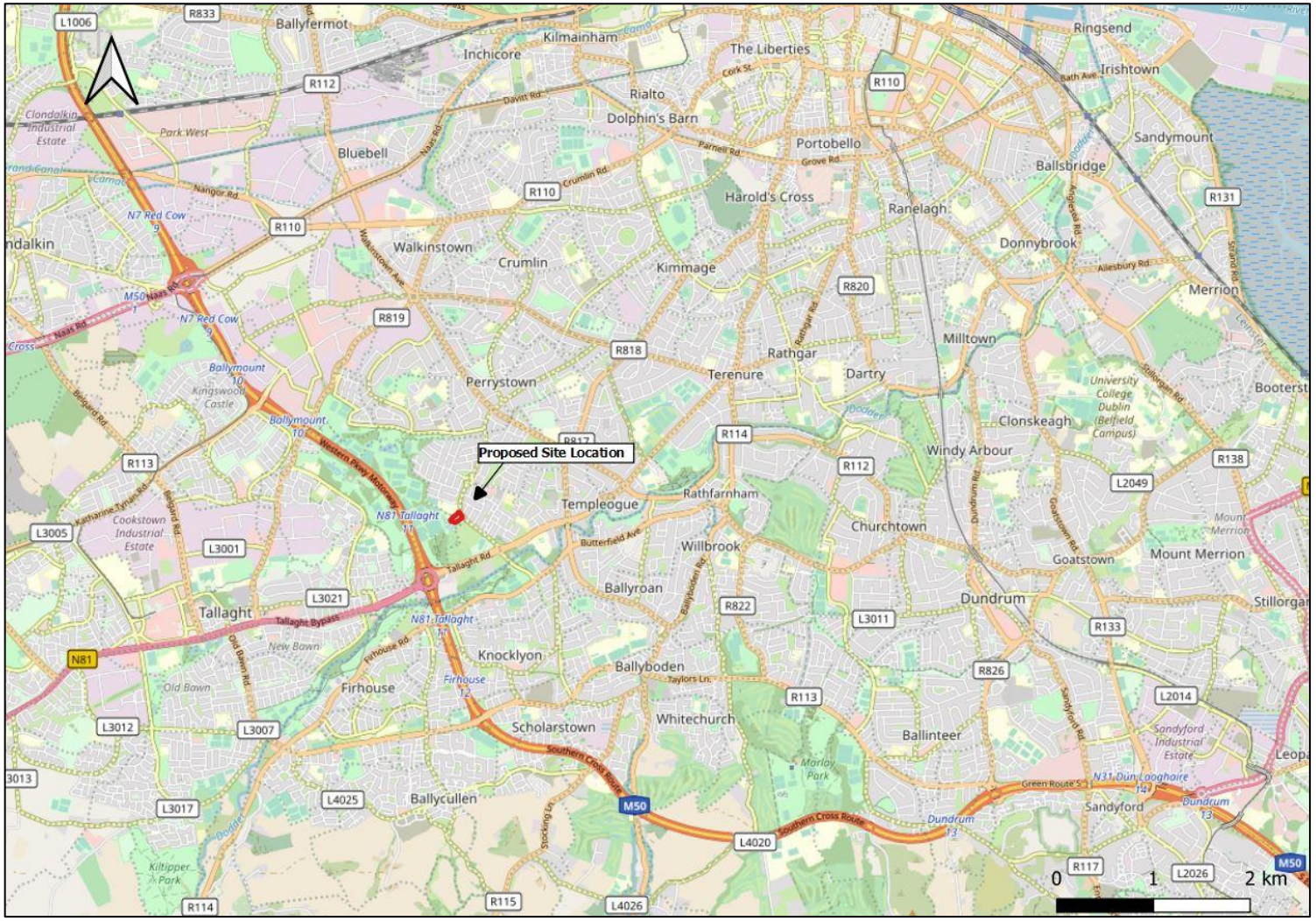
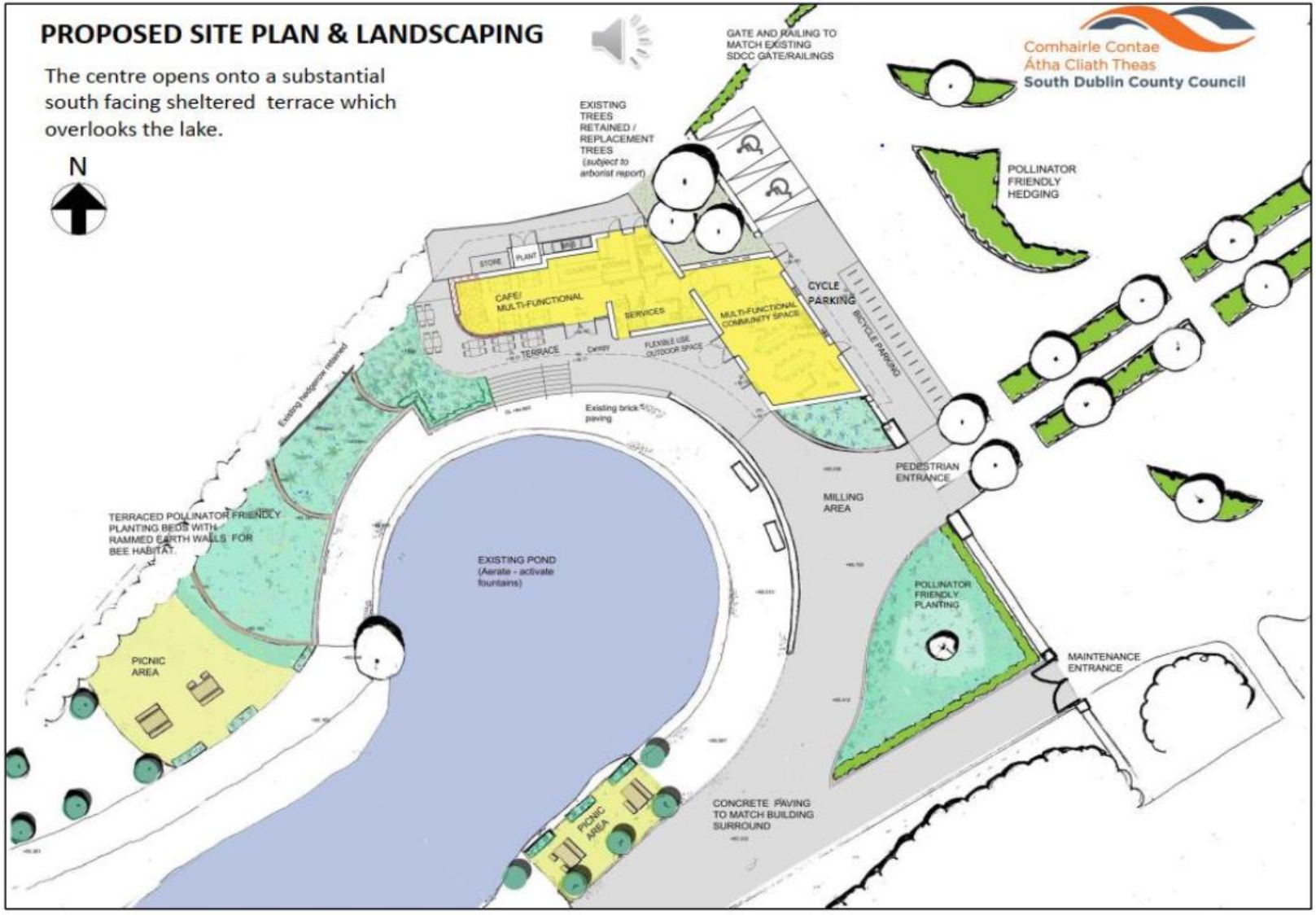


Figure 3-2: Proposed Site Plans & Landscaping



3.2 Description of the Existing Environment

3.2.1 Desktop Study and Information Sources

A desktop study was undertaken to inform this screening assessment. The desktop study comprised a review of the following key datasets and information sources:

- Identification of European sites within the Zone of Influence (ZoI) of the proposed development area through the identification of potential pathways/links from the proposed development area and European sites and/or supporting habitats.
- Review of the National Parks and Wildlife Service (NPWS) site synopsis, Natura 2000 data forms and Conservation Objectives for European sites identified through potential pathways from the proposed development (https://www.npws.ie/protected-sites).
- NPWS datasets on Annex I habitats and Annex II species.
- Review of available literature and web data. This included a detailed review of the NPWS and National Biodiversity Data Centre (NBDC) websites including mapping and available reports for relevant sites and in particular Qualifying Interests and Special Conservation Interests described and their Conservation Objectives.
- Review of Inland Fisheries Ireland (IFI) research data. This included reviewing research studies carried out for the Habitats Directive and Red Data Book Fish species within the receiving environment.
- Water Framework Directive (WFD) website (https://www.catchments.ie/guide-water-framework-directive/).
- GIS Online mapping (http://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228).
- EPA Mapping database (https://gis.epa.ie/EPAMaps/AAGeoTool).
- Review of previous ecological assessments undertaken within the area was also undertaken.

In addition, aerial photography (Google Maps, Bing Maps) and mapping (Ordnance Survey of Ireland, Geological Survey of Ireland) were used to identify non-designated habitats such as rivers, woodlands, and hedgerows of local ecological importance.

The findings of the desktop study are summarised hereunder.

3.2.2 Existing Environment

As noted, the proposed development site is located in Tymon Park. The proposed development site is approximately 7058m^2 in size. Habitats present within the proposed development site include; amenity grassland, ornamental shrubs and plants, hedgerows, scattered trees, hardstanding ground and an artificial lake/pond. The artificial lake appears to be a standalone waterbody with no hydrological connectivity to nearby watercourses.

There are no European sites located within or adjacent to the proposed development site. The closest European site is Glenasmole Valley SAC (Site Code: 001209) which is located approximately 5km south-west of the proposed development site.

The desktop assessment indicates that there are no Annex I habitats present within the proposed development site. In addition, a review of NBDC data indicates that no Annex II species have previously been recorded within, or in close proximity to the proposed development site. Otter *(Lutra lutra)* have previously been recorded at two locations on the

Dodder River, approximately 760m south and 1.1km south-east of the proposed development site. There is no hydrological connectivity between the artificial lake within the site and the Dodder River.

Roughan & O'Donovan undertook a Winter Habitat Study of Tymon Park in 2018 to inform proposed flood alleviation works on the River Poddle (Roughan & O'Donovan, 2018[9]). A winter bird survey was also undertaken throughout Tymon Park and Bancroft Park. A number of protected bird species were recorded during the survey, with the highest concentrations recorded at the northern boundary of the park and at Tymon Lake located approximately 900m north-west of the proposed development site. The report indicated, from anecdotal evidence, that light bellied brent geese *(Branta bernicla)* have not used Tymon Park in recent years as a result of constant disturbance by dogs and construction works.

A review of NBDC data indicates that there are no records of invasive plant species previously recorded within the footprint of the proposed development site.

3.3 Overview of Potential Impacts

The proposed development site is not located within or directly adjacent to any designated European site. Therefore, there will be no direct impact on any European site as a result of the proposed development.

There are several elements associated with the proposed development however that may give rise to indirect impacts that have the potential to result in likely significant effects during both the Construction and Operation Phases. The significance of these impacts depends on the scale of the impact as well as the ecological condition and the sensitivities of the qualifying interests/special conservation interests. Elements of the proposed development that may give rise to impacts which have been considered with regards to potential effects on European sites are discussed hereunder.

3.3.1 Construction Phase

Potential construction phase impacts associated with the proposed development are discussed hereunder.

3.3.1.1 Loss of Habitat

The proposed construction works will result in the total habitat loss of ca. 7058m^2. Habitats within the proposed development site which will be lost include amenity grassland, trees and artificial hardstanding ground.

3.3.1.2 Runoff of Sediment and/or Construction Pollution

Site clearance, excavation activities and the stockpiling of material have the potential to result in the runoff of sediment if not appropriately managed. The runoff of sediment could result in the sedimentation of nearby watercourses. Increased silt loading in watercourses can stunt aquatic plant growth, limit dissolved oxygen capacity and overall reduce the ecological quality of watercourses, with the most critical period associated with low flow conditions.

Excavation activities may also result in the temporary generation of dust in the locality of the works area. The Institute of Air Quality Management provide guidelines; *'Guidance on the*

9 Roughan & O'Donovan (June 2018) Winter Habitat Study and Bancroft Parks. (Unpublished Report)

Assessment of Dust from Demolition and Construction' (Holman *et al.*, 2014)[10], which prescribes potential dust emission risk classes to ecological receptors. Following the guidelines and considering the size of the proposed development, the scale of the earthworks are considered small (total site area <2,500m^2). The guidelines specify that receptor sensitivity is 'High' up to 20m from the source and reduces to 'Medium' at 50m. Dust may also be generated from trackout due to heavy duty vehicle (HDV) movements from the site entrance. Trackout movement associated with the proposed development is considered 'Small'. The guidelines indicate that 'Small' trackout equates to dust occurring up to 50m from the site. The spatial limit of dust impacts was therefore determined as a 50m buffer from the site entrance. Dust deposition on vegetation can inhibit growth.

Surface water runoff can be contaminated by leaks and spills of fuel, oil or other construction material from construction vehicles/machinery if not appropriately managed. The pouring of concrete will be required to facilitate the foundation works. The runoff of contaminated surface water can result in the degradation of water quality and impacts to aquatic fauna and flora.

3.3.1.3 Noise and Disturbance

The proposed construction works will result in an increase in noise levels during the works due to the presence of construction vehicles and machinery. The construction works will also result in an increase in personnel and traffic movement to and from the site. It is anticipated that rock breaking will be required during excavation activities. No blasting will be undertaken.

A temporary increase in noise levels within the site may result in disturbance to wildlife within the immediate vicinity of the site.

It is likely that construction lighting will be required during the construction works. Fugitive lighting can deter movement of species in the area.

3.3.1.4 Invasive Species

The desktop study indicates that no invasive plant species have previously been recorded within the footprint of the proposed development site. There is potential however that the movement of construction vehicles and material to and from the site may result in the introduction of invasive species if not appropriately managed. The establishment of invasive species can inhibit growth and crowd out native plant species.

3.3.2 Operational Phase Impacts

Potential operational phase impacts associated with the proposed development are discussed hereunder.

3.3.2.1 Noise and Disturbance

During the operational phase, the proposed development will operate as a multifunctional centre with a number of ongoing activities held within and outside the centre. There will be regular movement to and from the centre which will result in an increase in noise levels and disturbance. It should be noted however that existing background noise levels are likely to already be elevated within the area. The increase in human presence and noise levels during the operational phase is unlikely to impact the surrounding environment.

[10] Holman et al. (2014). IAQM Guidance on the assessment of dust from demolition and construction, Institutes of Air Quality Management, London. http://iaqm.co.uk/wpontent/uploads/guidance/iaqm_guidance_report_draft1.4.pdf.

3.3.2.2 Lighting

The proposed centre will result in an increase in artificial lighting in the immediate vicinity of the proposed development site.

3.4 Determining the Likely Zone of Influence

Guidance in AA of plans and projects in Ireland notes that a distance of 15km is recommended for the identification of relevant European sites[11]. For some projects the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in-combination effects.

Using the source-receptor-pathway model[12,13] an examination of the potential effects of the proposed development was undertaken (alone and / or in-combination) to identify what European sites, and which of their qualifying interests or special conservation interest species were potentially at risk. This was required to determine the ZoI for the proposed development. This conceptual model is a standard tool in environmental assessment. In order for an effect to occur, all three elements of this mechanism must be in place. The absence or removal of one of the elements of the mechanism means there is no likelihood for the effect to occur. In the context of the proposed development, the model comprises:

- Source (s) – potential impacts from the proposed development, e.g. the runoff of sediment/construction pollution;
- Pathway (s) – hydrological, physical or ecological connectivity between the proposed development and the European site; and
- Receptor (s) – qualifying interests and/or special conservation interests of the European sites.

The Chartered Institute of Ecology and Environmental Management (CIEEM) defines the ZoI of a project as the area(s) over which ecological features may be affected by the biophysical changes caused by the proposed project/development and associated activities.

In order to establish the ZoI of the proposed development works, the likely key biophysical changes associated with the works were determined having regard to the project characteristics set out in Section 3.4 of this report. The ZoI of the proposed development is described hereunder.

Impacts associated with the loss of habitats will be confined to within the proposed development site boundary. The ZoI was therefore defined as all lands within the red line boundary.

With regards potential habitat degradation effects associated with the release of sediment and other pollutants to surface water, the ZoI of the proposed development is considered to include receiving waterbodies adjacent to or downstream of the proposed development site during the construction phase. The distance downstream is associated with the current biological condition of the accepting waterbody and its capacity to accept and assimilate sediment and other pollutants.

[11] Department of the Environment, Heritage and Local Government DEHLG (2010). Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities.
[12] Cooper, L. M. (2004). Guidelines for Cumulative Effects Assessment in SEA of plans. EPMG Occasional Paper 04/LMC/CEA, Imperial College London.
[13] OPW (2012), Arterial Drainage Maintenance categories, Source » Pathway » Receptor Chains for Appropriate Assessment. OPW, Galway

The ZoI for dust impacts was established as 50m from the proposed development site.

Noise from the construction activity has the potential to cause disturbance to resting, foraging and commuting qualifying and special conservation interest species. Individual species will elicit differing behavioural responses to disturbance at different distances from the source of disturbance. Below is a summary of the documented zones of influence for varying species.

- Transport Infrastructure Ireland (formally the National Roads Authority) has produced a series of best practice planning and construction guidelines[14] for the treatment of certain protected mammal species (i.e. otter), which indicate that disturbance to terrestrial mammals would not extend beyond 150m.
- Cutts *et al.* (2013)[15] notes that different types of disturbance stimuli are characterised by different avifaunal reactions, however as a general rule of thumb, a distance of 300m can be used to represent the maximum likely disturbance distance for waterfowl.

The ZoI for noise/disturbance was therefore established as the proposed development site plus a 300m buffer.

3.5 Identification of Relevant European Sites

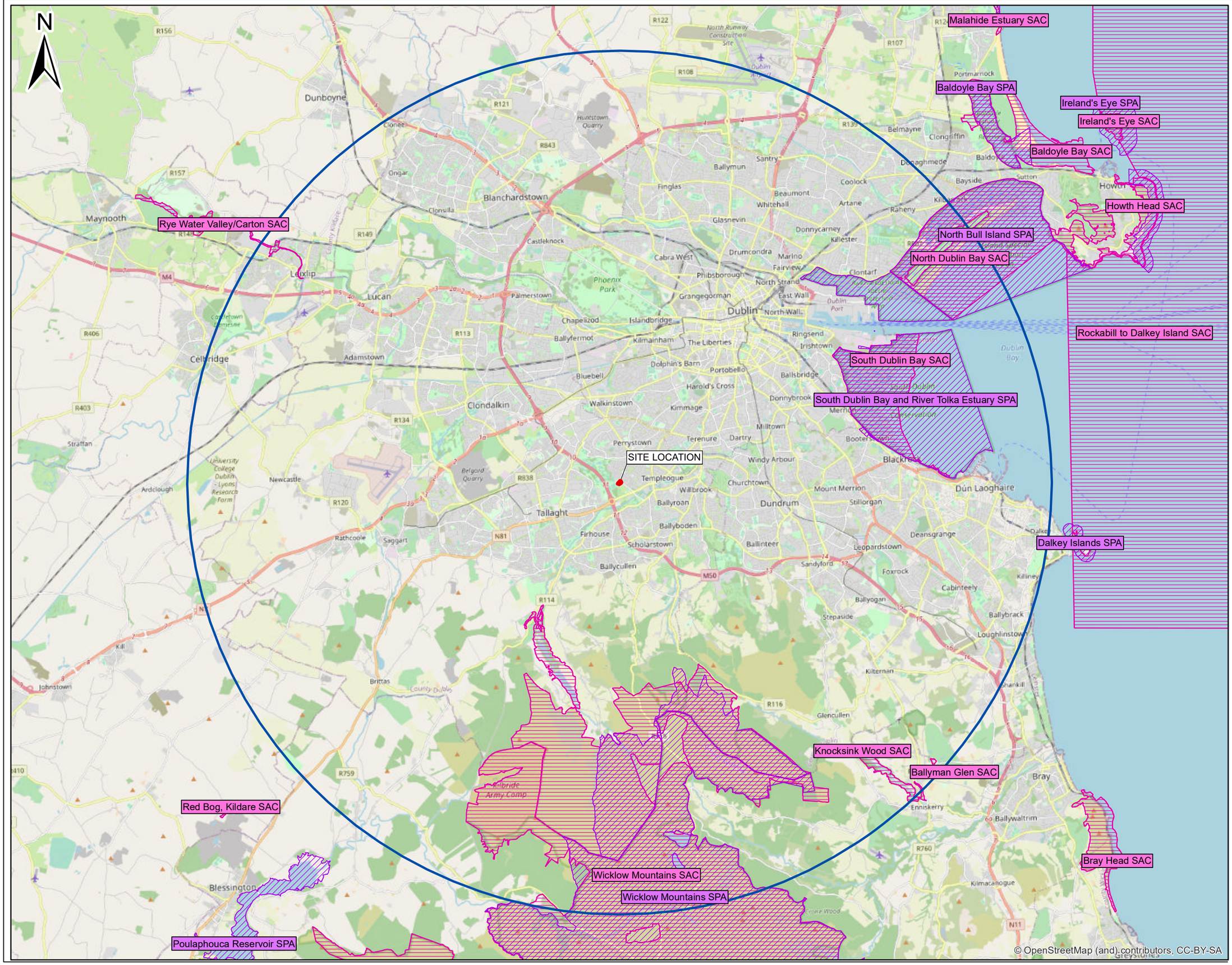
As mentioned above, the source-receptor-pathway conceptual model was used to identify a list of 'relevant' European sites (i.e. those which could be potentially affected). Ten European sites (seven SAC's and three SPA's) were identified within the 15km buffer and are listed in

Table 3-1 below and illustrated in Figure 3-3. In addition, the ten European sites and the potential for source-pathway-receptor links for effect was assessed and is outlined in Table 3-2.

Table 3-1: European Sites within the 15km buffer

Designated Sites	Approximate Distance from proposed development
Glenasmole Valley SAC (001209)	Ca. 5km south-west of the proposed development site.
Wicklow Mountain SAC (002122)	Ca. 7km south-east of the proposed development site.
Wicklow Mountain SPA (004040)	Ca. 6.7km south-east of the proposed development site.
South Dublin Bay SAC (000210)	Ca. 8.4km north-east of the proposed development site.
South Dublin Bay and River Tolka Estuary SPA (004024)	Ca. 8.4km north-east of the proposed development site.
North Dublin Bay SAC (000206)	Ca. 10km north-east of the proposed development site.
Knocksink Wood SAC (000725)	Ca. 12km south-east of the proposed development site.
North Bull Island SPA (004006)	Ca. 12.6km north-east of the proposed development site.
Rye Water Valley/Carton SAC (001398)	Ca. 13km north-west of the proposed development site.
Ballyman Glen SAC (000713)	Ca. 14.5km south-east of the proposed development site.

[14] Ref: http://www.tii.ie/technical-services/environment/
[15] Cutts, N., Hemingway, K., Spencer, J., (2013). Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Projects.



Legend

- Site Boundary
- 15km Buffer
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)

0 2.5 5
Kilometres

NOTES

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
3. ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
4. ALL LEVELS RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Issue	Date	Description	By	Chkd.
A	19/02/2021	Report Issue	M.N.	A.S.

Client:

Project:
TYMON PARK
INTER-GENERATIONAL
CENTRE

Title:
EUROPEAN SITES

Scale @ A3: 1:120,000

Prepared by: M. Nolan | Checked: A. Sands | Date: February 2021

Project Director: S. Tinnelly

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Figure 3-3

Table 3-2: European Sites within 15 km and Assessment of Likely Significant Effects

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
Glenasmole Valley SAC (001209)	• Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites) [6210] • Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) [6410] • Petrifying springs with tufa formation (Cratoneurion) [7220]	There is no hydrological connectivity between the proposed development and the SAC. The SAC is located approximately 5km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species. The SAC is designated for a groundwater dependant habitat. The SAC however is situated within the *Kilcullen* groundwater body (European Code: IE_EA_G_003) while the proposed development site is situated within the Dublin groundwater body (European Code: IE_EA_G_008). There is therefore no hydrogeological connectivity between the SAC and the proposed development. No source-pathway-receptor link exists between the proposed development site and the SAC.	No potential for significant effects
Wicklow Mountain SAC (002122)	• Oligotrophic waters containing very few minerals of sandy plains *(Littorelletalia uniflorae)* [3110] • Natural dystrophic lakes and ponds [3160] • Northern Atlantic wet heaths with *Erica tetralix* [4010] • European dry heaths [4030]	There is no hydrological connectivity between the proposed development site and the SAC. The SAC is located approximately 7km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species.	No potential for significant effects

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
	• Alpine and Boreal heaths [4060] • Calaminarian grasslands of the *Violetalia calaminariae* [6130] • Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] • Blanket bogs (* if active bog) [7130] • Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) [8110] • Calcareous rocky slopes with chasmophytic vegetation [8210] • Siliceous rocky slopes with chasmophytic vegetation [8220] • Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] • *Lutra lutra* (Otter) [1355]	The SAC is designated for otter. Considering the distance between the proposed development site and the SAC (ca. 7km) there is no potential for disturbance impacts. An artificial lake occurs immediately adjacent to the site; there are no previous records of otter recorded at the lake. Otter have previously been recorded along the Dodder River located approximately 760m south and 1.1km south-east of the proposed development. There is no hydrological connectivity between the Dodder and the artificial lake. No source-pathway-receptor link exists between the proposed development site and the SAC.	
Wicklow Mountain SPA (004040)	• Merlin (*Falco columbarius*) [A098] • Peregrine (*Falco peregrinus*) [A103]	There is no hydrological connectivity between the proposed development site and the SPA. The SPA is located approximately 6.7km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance	No potential for significant effects

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
		there is no potential for the introduction of invasive plant species. Considering the distance between the proposed development site and the SPA (ca. 6.7km) there is no potential for the disturbance of the SCI species. In addition, there is no suitable habitat within the proposed development site to support the SCI species. No source-pathway-receptor link exists between the proposed development site and the SPA.	
South Dublin Bay SAC (000206)	• Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • Salicornia and other annuals colonising mud and sand [1310] • Embryonic shifting dunes [2110]	The SAC is located approximately 8.4km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species. There is no hydrological connectivity between the proposed development site and the SAC. No source-pathway-receptor link exists between the proposed development site and the SAC.	No potential for significant effects
South Dublin and River Tolka Estuary SPA (004024)	• Light-bellied Brent Goose *(Branta bernicla hrota)* [A046] • Oystercatcher *(Haematopus ostralegus)* [A130]	The SPA is located approximately 8.4km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species.	No potential for significant effects

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
	• Ringed Plover *(Charadrius hiaticula)* [A137] • Grey Plover *(Pluvialis squatarola)* [A141] • Knot *(Calidris canutus)* [A143] • Sanderling *(Calidris alba)* [A144] • Dunlin *(Calidris alpina)* [A149] • Bar-tailed Godwit *(Limosa lapponica)* [A157] • Redshank *(Tringa totanus)* [A162] • Black-headed Gull *(Chroicocephalus ridibundus)* [A179] • Roseate Tern *(Sterna dougallii)* [A192] • Common Tern *(Sterna hirundo)* [A193] • Arctic Tern *(Sterna paradisaea)* [A194] • Wetland and Waterbirds [A999]	There is no hydrological connectivity between the proposed development site and the SPA. Considering the distance between the SPA and the proposed development site there is no potential for the disturbance of the designated SCIs. There is potential however that the SCI species may utilise habitats located outside their designated sites. The proposed development site however occurs in a predominantly built up area with an existing high level of disturbance. In addition, previous winter bird surveys undertaken by Roughan & O'Donovan, 2018[16] found that the majority of wintering bird species recorded were recorded towards the northern boundary of the park and at Tymon Lake located an excess of 900m from the site. Thus, it is considered that the proposed development site is unlikely to support a significant population of these SCI species.	
North Dublin Bay SAC (000206)	• Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210]	The SAC is located approximately 12.6km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species.	No potential for significant effects

16 Roughan & O'Donovan (June 2018) Winter Habitat Study and Bancroft Parks. (Unpublished Report)

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
	• Salicornia and other annuals colonizing mud and sand [1310] • Atlantic salt meadows (*Glauco-Puccinellietalis maritimae)* [1330] • Mediterranean salt meadows (*Juncetalia maritimi)* [1410] • Embryonic shifting dunes [2110] • Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120] • Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] • Humid dune slacks [2190] • Petalwort (*Petalophyllum ralfii)* [1395]	There is no hydrological connectivity between the proposed development site and the SAC.	
Knocksink Wood SAC (000725)	• Petrifying springs with tufa formation (Cratoneurion) [7220] • Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] • Alluvial forests with *Alnus glutinosa* and Fraxinus excelsior *(Alno-Padion, Alnion incanae, Salicion albae)* [91E0]	The SAC is located approximately 12km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species. There is no surface water hydrological connectivity between the proposed development site and the SAC. The SAC is designated for a groundwater dependant habitat. The SAC is located within the Wicklow (European Code:	No potential for significant effects

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
		IE_EA_G_076) and Enniskerry Gravels (European Code: IE_EA_G_038) groundwater bodies, while the proposed development site occurs within the Dublin groundwater body (European Code: IE_EA_G_008).There is no hydrogeological connectivity between the SAC and the proposed development. No source-pathway-receptor link exists between the proposed development site and the SAC.	
North Bull Island SPA [004006]	• Curlew *(Numenius arquata)* [A160] • Dunlin (*Calidris alpina)* [A149] • Bar-tailed Godwit (*Limosa lapponica)* [A157] • Redshank (*Tringa tetanus)* [AA162] • Black-headed Gull *(Chroicocephalus ridibundus)* [A179] • Sanderling *(Calidris alba)* [A144] • Black-tailed Godwit (*Limosa limosa)* [A156] • Knot (*Calidris canutus)* [A143] • Turnstone *(Arenaria interpres)* [A169 • Pintail *(Anas acutal)* [A054] • Light-bellied Brent Goose (*Branta bernicla hrota)* [A046] • Shelduck (*Tadorna tadorna)* [A048]	The SPA is located approximately 15km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species. Considering the distance between the SPA and the proposed development site there is no potential for the disturbance of the designated SCIs; and as noted, there is no potential for the proposed development site to support significant numbers of the SCI species. No source-pathway-receptor link exists between the proposed development site and the SPA.	No potential for significant effects

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
	• Teal *(Anas crecca)* [A052] • Grey Plover (*Pluvialis squatarola)* [A141] • Shoveler *(Anas clypeata)* [A056] • Oystercatcher (*Haematopis ostralegus)* [A130] • Golden Plover *(Pluvialis apricaria)* [A140] • Wetland and Waterbirds [A999]		
Rye Water Valley/Carton SAC (001398)	• Petrifying springs with tufa formation (Cratoneurion) [7220] • *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014] • *Vertigo moulinsiana* (Desmoulin's Whorl Snail) [1016]	The SAC is located approximately 13km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species. There is no surface water hydrological connectivity between the proposed development site and the SAC. The SAC is designated for groundwater dependant species and habitat. Both the SAC and the proposed development site are located within the Dublin groundwater body (European Code: IE_EA_G_008). However a review of the GSI website[17] indicates that the groundwater flow is towards the coast. The proposed development therefore occurs downstream of the SAC. Thus there is no hydrogeological connectivity between the SAC and the proposed development.	No potential for significant effects

[17] https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx

European Site	Qualifying Interests (QI) / Special Conservation Interests (SCI)	Source-Pathway-Receptor Link	Possibility of Likely Significant Effects
		No source-pathway-receptor link exists between the proposed development site and the SAC.	
Ballyman Glen SAC (000713)	• *Petrifying springs with tufa formation (Cratoneurion) [7220]* • Alkaline Fen [7230]	The SAC is located approximately 14.5km from the proposed development site and thus occurs outside the ZoI of direct habitat impacts and dusts effects. Similarly, due to distance there is no potential for the introduction of invasive plant species. There is no surface water hydrological connectivity between the proposed development site and the SAC. The SAC is designated for two groundwater dependant habitats. The SAC is located within the Enniskerry Gravels groundwater body (European Code: IE_EA_G_038), while the proposed development site occurs within the Dublin groundwater body (European Code: IE_EA_G_008).There is no hydrogeological connectivity between the SAC and the proposed development. No source-pathway-receptor link exists between the proposed development site and the SAC.	No potential for significant effects

4.0 IDENTIFICATION OF LIKELY SIGNIFICANT EFFECTS

4.1 Potential for Likely Significant Effects

As outlined in Table 3-2 no source-pathway-receptor link exists between the proposed development site and any European site. As no so source-pathway-receptor links were identified there is no potential for likely significant effects on any European site in view of their conservation objectives.

4.2 Potential for In-Combination Effects

Article 6(3) of the Habitats Directive requires that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.'

It is therefore required that the potential impacts of the proposed development are considered in-combination with any other relevant plans or projects. A review of South Dublin County Council planning portal[18] was therefore undertaken.

The planning portal indicates that a number of small scale residential developments / conversions are proposed in proximity to the proposed development site. The small residential developments however have no connectivity to the proposed development site or any European sites. Considering the small scale and temporary nature of the proposed residential developments, coupled with the lack of connectivity, and the absence of potential significant effects associated with the proposed centre development there is no potential for the in-combination of effects.

A review of the EIA portal[19] was also undertaken. The EIA portal indicates that South Dublin County Council are proposing flood alleviation works along the upper reaches of the River Poddle at Tymon North (EIA Portal ID: 2020027) which is located approximately 1km north-west of the proposed centre location. The flood alleviation works were subject to Appropriate Assessment undertaken by NM Ecology Ltd[20]. The Natura Impact Statement (NIS) identified source-pathway-receptor links between the proposed flood alleviation works and South Dublin Bay and River Tolka Estuary SPA, South Dublin Bay SAC, North Bull Island SPA and North Dublin Bay SAC. The report concluded that following the implementation of the prescribed mitigation measures there is no potential for adverse effects on the above mentioned European sites. Considering the mitigation measures that will be implemented during the flood alleviation works, coupled with the absence of potential significant effects associated with the proposed centre development, there is no potential for in-combination effects.

5.0 SCREENING ASSESSMENT CONCLUSION

This assessment determined that potential impacts associated with the proposed development, either alone or in-combination with other plans and projects, will not result in likely significant

[18] https://www.sdcc.ie/en/services/planning/planning-applications/search-and-view/
[19] https://www.gov.ie/en/publication/9f9e7-eia-portal/
[20] NM Ecology Ltd (January, 2020) Natura Impact Statement River Poddle Flood Alleviation Scheme (unpublished Report)

effects on any European site in view of their conservation objectives. A Stage 2 Appropriate Assessment is therefore not required.

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