MWP

APPROPRIATE ASSESSMENT SCREENING REPORT

St. Cuthbert's Park Upgrade, Deansrath, Dublin 22

South Dublin County Council

September 2022

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1. Summary of Findings

1.1 Screening for Appropriate Assessment

Project Title	Appropriate Assessment for upgrade and redesign of St. Cuthberts Park
Project Proponent	South Dublin County Council
Project Location	St. Cuthberts Park, Dublin
Screening for Appropriate Assessment	The Screening for Appropriate Assessment is undertaken to determine the potential for likely significant effects of the proposed project, individually, or in combination with other plans or projects, in view of the conservation objectives of the site on a Natura 2000 Site.
Conclusion	It has been objectively concluded during the screening process that the Natura 2000 sites within the zone of influence of the proposed works will not be significantly impacted by the proposed project at St. Cuthberts Park in County Dublin. These sites are: • Rye Water Valley/Carton SAC • Glenasmole Valley SAC • Wicklow Mountains SAC • South Dublin Bay SAC • Wicklow Mountains SPA • South Dublin Bay and River Tolka Estuary SPA • North Bull Island SPA

2. Introduction

South Dublin County Council ('the Applicant') is submitting a Part 8 Planning Application for permission to redesign and upgrade St Cuthbert's Park, Deansrath, Dublin 22 (hereafter referred to as the 'proposed development'). The location of the proposed development is hereafter referred to as 'proposed development site'.

This screening for Appropriate Assessment has been undertaken to determine whether the proposed development is likely to have a significant effect on any Natura 2000 site (i.e., SACs and SPAs), in view of the sites' conservation objectives. This screening for Appropriate Assessment has been undertaken by a staff environmental scientist from Malachy Walsh and Partners (MWP).

2.1 Legislative Context

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC)[1] seeks to protect birds of special importance by the designation of Special Protected Areas (SPAs). It is the responsibility of each member state to designate SPAs and SACs, both of which form part of Natura 2000, a network of protected sites throughout the European Community. Further information is available at:

http://ec.europa.eu/environment/nature/legislation/habitatsdirective/

http://www.npws.ie/planning/appropriateassessment/

The current assessment was conducted within this legislative framework and also the DoEHLG (2009) guidelines. As outlined in these, it is the responsibility of the proponent of the project, in this case IE, to provide a comprehensive and objective screening for Appropriate Assessment, which can then be used by the competent authority, in order to conduct the Appropriate Assessment (DoEHLG, 2009).

2.2 Stages of Appropriate Assessment

The Appropriate Assessment process is a four-stage process with issues and tests at each stage. The purpose of the screening assessment is to record in a transparent and reasoned manner the likely effects on Natura 2000 sites of a proposed development. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. The stages are set out in **Appendix 1**.

3. Assessment Methodology

3.1 Appropriate Assessment Guidance

This screening for Appropriate Assessment, or Stage 1, has been undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001), the European Commission Guidance '*Managing Natura 2000 Sites*' Brussels, 21.11.2018 C (2018) 7621 final (EC, 2000), and *Appropriate Assessment of Plans & Projects - Guidance for Planning Authorities* prepared by the NPWS (DoEHLG, 2009 (rev. 2010) and the *Planning Regulator: - Appropriate Assessment Screening for Development Management , OPR Practice Note PN01* Office of the Planning Regulator, 2021.

[1] This is the codified version of Directive 79/409/EEC as amended (see http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm)

3.2 Desk Study

In order to complete the screening for Appropriate Assessment certain information on the existing environment is required. A desk study was carried out to collate available information on the subject site's natural environment. This comprised a review of the following publications, data and datasets:

- OSI Aerial photography and 1:50000 mapping
- National Parks and Wildlife Service (NPWS)
- National Biodiversity Data Centre (NBDC) (on-line map-viewer)
- BirdWatch Ireland
- Teagasc soil area maps (NBDC website)
- Geological Survey Ireland (GSI) area maps
- Environmental Protection Agency (EPA) water quality data
- Other information sources and reports footnoted in the course of the report

4. Screening for Appropriate Assessment

As set out in the NPWS guidance (DoEHLG, 2009), the task of establishing whether a plan or project is likely to have an effect on a Natura 2000 Site is based on a preliminary impact assessment using available information and data, including that outlined above, and other available environmental information, supplemented as necessary by local site information and ecological surveys. This is followed by a determination of whether there is a risk that the effects identified could be significant. The precautionary principle approach is required.

Once the potential impacts that may arise from the proposed development are identified the significance of these is assessed through the use of key indicators:

- Habitat loss
- Habitat alteration
- Habitat or species fragmentation
- Disturbance and/or displacement of species
- Water quality and resource.

Screening for Appropriate Assessment (Stage 1) determines the need for a full Appropriate Assessment (Stage 2) and consists of a number of steps, each of which is addressed in the following sections of this report:

4.1 Establish whether the proposed remediation works are necessary for the management of a Natura 2000 Site

4.2 Description of the proposed works

4.3 Identification of Natura 2000 Sites potentially affected

4.4 Identification and description of potential individual and cumulative impacts of the works

4.5 Assessment of the significance of the impacts on the integrity of Natura 2000 Sites

4.6 Conclusion of screening stage

The purpose of the screening assessment is to record in a transparent and reasoned manner the likely effects, on relevant Natura 2000 Sites, of the proposed remediation works.

4.1 Management of Natura 2000 Sites

The proposed development is not connected with or necessary to the conservation management of a Natura 2000 Site.

4.2 Description of the Scheme

4.2.1 Subject Site Location

The works proposed by South Dublin County Council, are located at St. Cuthberts Park, Deansrath, Co. Dublin. The proposed development site is situated approximately 225m south of the Grand Canal. An aerial view of the site is presented in Figure 4-1.

4.2.2 Description of Subject Site

St. Cuthbert's Park is located less than a half a kilometre south of the Grand Canal at Deansrath in the South County Dublin administrative area. The Park area is 12.7 hectares and forms the public open space for the Deansrath, Kilmahuddrick and Bawnogue neighbourhoods. A social housing development at St. Cuthbert's Meadows has recently been completed and overlooks the north-easternmost part of the Park. Deansrath Community College lies to the east and St Ronan's National School to the south.

Currently the park is largely grassed, with a remnant well-developed hedgerow system and some mature trees surrounding the ruined Church of St Cuthbert's and along the banks of associated drainage channels.

The proposed works are within the curtilage of three Protected Structures - St. Cuthbert's Church (DU017-038001-), the associated graveyard (DU017-038002-), and the moated site (DU017-038003-). The three sites are also collectively entered as one in the Record of Protected Structures, ref RPS133.

The main vehicular maintenance entrance lies to the south off Westbourne Rise. There are a number of pedestrian entrances, fitted with galvanised steel kissing gates. The boundary treatment varies around the park. A high grass mound was created during an upgrade in early 2000's, using inert material from local development sites, providing added interest, shelter and a panoramic viewing point.

Clondalkin Celtic have allocated pitches in the north of the park, with two containers to the south of the pitch for storage/changing. Formal seating is limited to some park benches located near a (modern) stone circle feature in the west of the park. Large pylons and overhead cables extend along the northern boundary, delivering power to Grange Castle Business park.

The park has been subject to anti-social activity such as littering, dumping, illegal use of scramblers and quad bikes and intimidating behaviour. It is failing to meet its potential in terms of amenity, biodiversity and heritage and is not serving the community well in terms of recreational amenity.

A High-Level Taskforce was created to drive local community development and, together with the Local Area Committee, have requested a re-design and upgrade of the park.

4.2.3 Overview of the Project

Currently, St. Cuthbert's park is failing to meet its potential in terms of amenity, biodiversity and heritage and is not serving the community well in terms of recreational amenity. It offers very limited facilities to the local community and is frequently in poor condition; therefore, SDCC is proposing to re-design and upgrade of the Park.

SDCC wishes to bring the park back to life with a renewed focus on meeting the needs of the communities that live and surround it. The vision is to create a safe, clean environment free from anti-social behaviour for people of all ages to meet, exercise and enjoy nature. The aim is to make the park a source of pride for the local community. The Park will offer amenity, interconnected green infrastructure, biodiversity enhancement including habitat for pollinators.

4.2.4 Description of works

The project involves the following works:

- Proposed hard-surfaced primary walking/ cycling route with public lighting; traversing east-west, through the park;
- Proposed hard-surfaced secondary walking/ cycling routes through the park;
- 3 No. Nodal points with seating as required;
- Proposed on-street car parking and pedestrian crossing points (subject to detailed design with SDCC Roads Dept.);
- Proposed vantage point, seating and signage;
- Proposed Teenspace area with equipment, seating and surfacing;
- Proposed outdoor exercise area with calisthenics or similar;
- Proposed natural and equipped playspaces for children;
- Proposed performance/ events area;
- Proposed dogs off-leash area with dog-friendly features;
- Proposed arboretum with edible fruits and nut trees;
- Proposed grass sports pitches;
- Proposed Multi Use Games Area (MUGA) with floodlighting;
- Proposed play/exercise trail along the walking / cycling routes;
- Proposed new planting to include: wildflower grassland with drifts of native bulbs; formal avenue trees; informal tree groups; community woodland; informal tree groups with native species; and other planting as required;
- Vegetation clearance of St Cuthberts Church, Moated Site and Graveyard Site and further assessment of works to conserve the structure as advised; (Monuments of Archaeological Interest and a Protected Structure);
- Seating, bicycle parking and signage;
- Works to boundaries, accesses and entrances;
- All associated landscape design including furniture and planting;

- All ancillary works.

It is intended that the Masterplan Plan proposals may be delivered in phases, subject to available funding, with priorities identified in conjunction with the High Level Task Force.

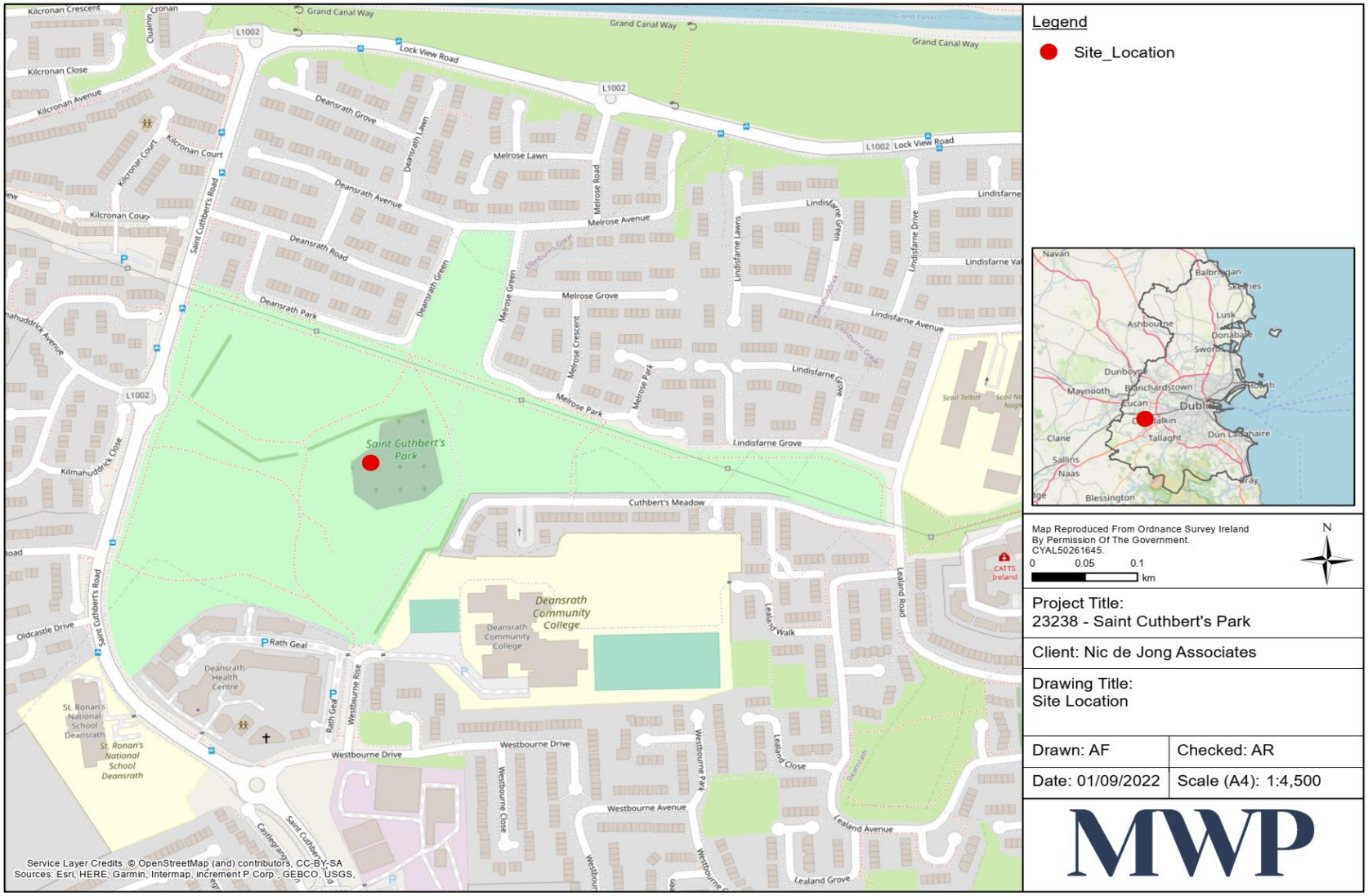

Figure 4-1: Proposed Site Location

Figure 4-2: Site Layout Map

4.3 Characteristics of the Project

The proposal is described in Table 4-1.

Table 4-1: Project Proposal

Size, scale, area, land-take	The existing park has a total area of approximately 12.7 ha and the proposed upgrade to the park will comprise a total works area of circa 9,700m^2.
Details of physical changes that will take place during the various stages of implementing the proposal	• Proposed hard-surfaced primary walking/ cycling route with public lighting; traversing east-west, through the park; • Proposed hard-surfaced secondary walking/ cycling routes through the park; • 3 No. Nodal points with seating as required; • Proposed on-street car parking and pedestrian crossing points (subject to detailed design with SDCC Roads Dept.); • Proposed vantage point, seating and signage; • Proposed Teenspace area with equipment, seating and surfacing; • Proposed outdoor exercise area with calisthenics or similar; • Proposed natural and equipped playspaces for children; • Proposed performance/ events area; • Proposed dogs off-leash area with dog-friendly features; • Proposed arboretum with edible fruits and nut trees; • Proposed grass sports pitches; • Proposed Multi Use Games Area (MUGA) with floodlighting; • Proposed play/exercise trail along the walking / cycling routes; • Proposed new planting to include: wildflower grassland with drifts of native bulbs; formal avenue trees; informal tree groups; community woodland; informal tree groups with native species; and other planting as required; • Vegetation clearance of St Cuthberts Church, Moated Site and Graveyard Site and further assessment of works to conserve the structure as advised; (Monuments of Archaeological Interest and a Protected Structure); • Seating, bicycle parking and signage; • Works to boundaries, accesses and entrances; • All associated landscape design including furniture and planting; • All ancillary works.

Description of resource requirements for the construction/operation and decommissioning of the proposal (water resources, construction material, human presence etc)	Construction materials will be required onsite. Asphalt will be used as surfacing for main foot paths and secondary paths. There will be approximately 1,450m^3 of top soil to be reused on the site. There will be a further approximately 740m^3 of subsoil to be reused around the site.
Description of timescale for the various activities that will take place as a result of implementation (including likely start and finish date)	The duration of the Construction phase will be approximately 9 to 12 months.
Description of wastes arising and other residues (including quantities) and their disposal	The waste that will generate on-site will include following. • Excavated soil – to be reused on site • Waste concrete/mortar and other cementitious material • Waste steel and other scrap metal • Soil/sub-soil, stones • Paper, cardboard • Mixed C&D waste • Fuel/oil residues • Construction chemicals and other known hazardous substances (paints, glues/adhesives, batteries etc.) • Other residual building materials • W/C utilities waste General construction material waste, including plastic will be recycled where possible and/or removed to approved waste disposal facility. Construction waste will be separated on site, recycled where possible and removed to approved waste disposal facility.
Identification of wastes arising and other residues (including quantities) that may be of particular concern in the context of the Natura 2000 network	– Waste from construction phase, such as plastic, mortar, concrete, chemicals During the construction phase the works will be carried out using Construction Best Practice. The works will take cognisance of CIRIA technical guidance on water pollution control (Murnane, E., Heap, A., and Swain, A., 2006).
Description of any additional services required to implement the project or plan, their location and means of construction	N/A

4.4 Identification of Natura 2000 Sites

4.4.1 Zone of Impact Influence

The screening stage of AA involves compiling a 'long list' of Natura 2000 sites within a zone of potential impact influence for later analysis which may or may not be significantly impacted upon by the proposed development.

The "zone of influence" for a project is the area over which ecological features may be subject to significant effects as a result of the proposed project and associated activities (CIEEM, 2018). This is likely to extend beyond the site where there are ecological or hydrological connection(s) beyond the site boundaries.

The subject site and a distance of 15km is recommended as a potential zone of influence (Scott Wilson et al., 2006). However, National Parks and Wildlife Service (NPWS) guidance (NPWS, 2009) advises that this zone of influence be assessed on a case-by-case basis with consideration of the nature, size, and location of the project, the sensitivities of the ecological receptors and the potential for cumulative effects. As such, Natura 2000 sites beyond 15km may also be considered based on the potential for an ecological and/or hydrological to the project site, bearing in mind the precautionary principle and using the Source-Pathway-Receptor framework.

Following this, the potential impacts associated with the proposed development will be identified before an assessment is made of the likely significance of these impacts.

As described above, the test for the screening for Appropriate Assessment is to assess, in view of best scientific knowledge, if the development, individually or in combination with other plans/project is likely to have a significant effect on a Natura 2000 site. If there are any significant, potentially significant, or uncertain effects, it will be necessary to proceed to Appropriate Assessment and submit an NIS.

The locations of Natura 2000 sites within the zone of potential significant impact influence of the proposed development site, bearing in mind the precautionary principle. Natura 2000 sites within the zone of potential significant impact influence of the proposed development site, including their proximity are shown in Table 4-2. The qualifying features of Special Conservation Interest of the Natura 2000 sites are outlined in Table 4-3.

Table 4-2: Natura 2000 Sites within zone of potential impact influence of the proposed development site

Sr. No	Designated Site	Site Code	Proximity of Site to Nearest Point of Designated Site
1.	Rye Water Valley/Carton SAC	(001398)	The SAC is located approximately 5.8km northwest from the site
2.	Glenasmole Valley SAC	(001209)	The SAC is located approximately 8.3 south from the site
3.	Wicklow Mountains SAC	(002122)	The SAC is situated approximately 13.7 southeast from the site
4.	South Dublin Bay SAC	(000210)	The SAC is located approximately 14 km east from the site
5.	Wicklow Mountains SPA	(004040)	The SPA is located approximately 13.7km southeast from the site
6.	South Dublin Bay and River Tolka Estuary SPA	(004024)	The SPA is located approximately 14km east from the site
7.	North Bull Island SPA	(004006)	This SPA is located approximately 16km northeast from the site

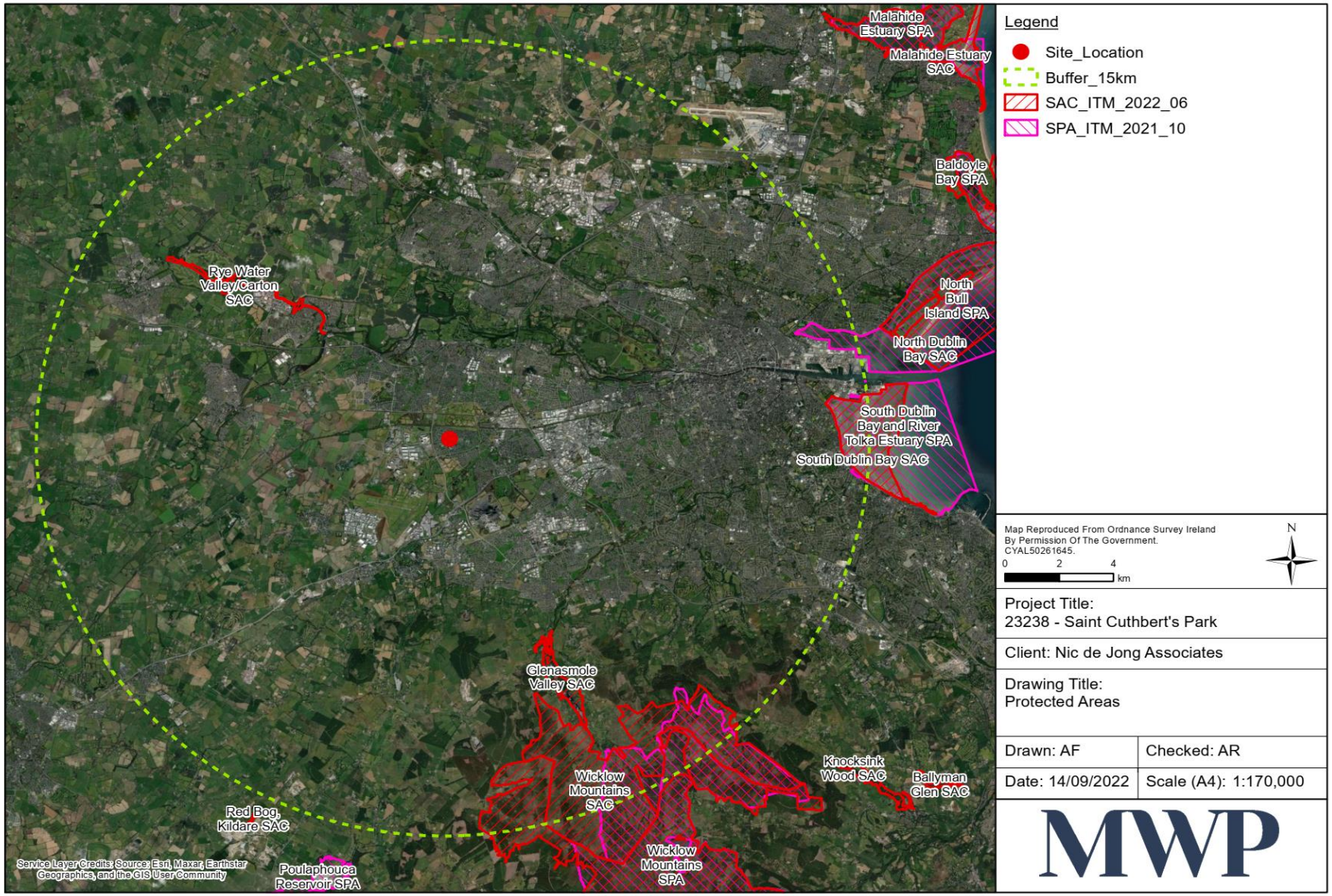

Figure 4-3: Natura 2000 Sites within the Zone of potential Influence

4.4.2 Characteristics of Natura 2000 Sites

Table 4-3 lists the qualifying features of Special Conservation Interest for the Natura 2000 sites that lie within the zone of potential impact influence of the subject site. Information pertaining to the Natura 2000 sites is from site synopses, conservation objectives and other information available on www.npws.ie.

Table 4-3: Natura 2000 Sites with qualifying features of Special Conservation Interest

Natura 2000 Site	Qualifying features of Special Conservation Interest
Rye Water Valley/Carton SAC (001398)	**Species** 1014 Narrow-mouthed Whorl Snail*(Vertigo angustior)* 1016 Desmoulin's Whorl Snail*(Vertigo moulinsiana)* **Habitats** 7220 Petrifying springs with tufa formation (Cratoneurion)*
Glenasmole Valley SAC (001209)	6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) 7220 Petrifying springs with tufa formation (Cratoneurion)*
Wicklow Mountains SAC (002122)	**Species** 1355 Otter*(Lutra lutra)* **Habitats** 3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) 3160 Natural dystrophic lakes and ponds 4010 Northern Atlantic wet heaths with Erica tetralix 4030 European dry heaths 4060 Alpine and Boreal heaths 6130 Calaminarian grasslands of the Violetalia calaminariae 6230 Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)* 7130 Blanket bogs (* if active bog) 8110 Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) 8210 Calcareous rocky slopes with chasmophytic vegetation 8220 Siliceous rocky slopes with chasmophytic vegetation 91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles
South Dublin Bay SAC (000210)	**Habitats** 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 2110 Embryonic shifting dunes

Natura 2000 Site	Qualifying features of Special Conservation Interest
Wicklow Mountains SPA (004040)	**Birds** A098 Merlin*(Falco columbarius)* A103 Peregrine*(Falco peregrinus)*
South Dublin Bay and River Tolka Estuary SPA (004024)	**Habitats** Wetlands **Birds** A162 Redshank*(Tringa totanus)* A193 Common Tern*(Sterna hirundo)* A157 Bar-tailed Godwit*(Limosa lapponica)* A130 Oystercatcher*(Haematopus ostralegus)* A141 Grey Plover*(Pluvialis squatarola)* A149 Dunlin*(Calidris alpina)* A137 Ringed Plover*(Charadrius hiaticula)* A194 Arctic Tern*(Sterna paradisaea)* A192 Roseate Tern*(Sterna dougallii)* A143 Knot*(Calidris canutus)* A179 Black-headed Gull*(Chroicocephalus ridibundus)* A144 Sanderling*(Calidris alba)* A046 Light-bellied Brent Goose*(Branta bernicla hrota)*
North Bull Island SPA (004006)	A046 Light Belled Brent Goose *Branta bernicla hrota* A048 Shelduck *Tadorna tadorna* 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

4.4.3 Conservation Objectives

According to the Habitats Directive, the *conservation status of a natural habitat* will be taken as 'favourable' within its biogeographic range when:

- Its natural range and areas it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and
- The conservation status of its typical species is favourable as defined below.

According to the Habitats Directive, the conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations. The conservation status will be taken as 'favourable' within its biogeographic range when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

The specific conservation objectives for each site are available on www.npws.ie. The site-specific conservation objectives were available for following sites:

- Rye Water Valley/Carton SAC
- Glenasmole Valley SAC
- Wicklow Mountains SAC
- South Dublin Bay SAC
- Wicklow Mountains SPA
- South Dublin Bay and River Tolka Estuary SPA
- North Bull Island SPA

These have been accessed for the sites listed in the tables above on the [17/08/2022]. Generic conservation objectives were available for the following sites:

- South Dublin Bay and River Tolka Estuary SPA, produced March 2015;

All conservation objectives together with other designated site information are available on http://www.npws.ie/protectedsites/.

4.5 Identification of Potential Impacts

Potential likely ecological impacts arising from the project are identified in Table 4-4.

Table 4-4: Potential likely ecological impacts

Description of elements of the project likely to give rise to potential ecological impacts.	▪ Use of construction equipment, and vehicles. ▪ Use of fuels/oils and cement. ▪ Runoff of pollution from the site e.g. increased sedimentation. ▪ Production of waste waters from toilets etc. ▪ Use and storage of fuel and oil on site.
Describe any likely direct, indirect or secondary ecological impacts of the project (either alone or in combination with other plans or projects) by virtue of:	The proposal is to upgrade the existing park with an overall works area of 9,700m2 within an urban environment, which has been significantly modified by human activity. Works will be undertaken on phased basis.

Size and scale; *Land-take;* *Distance from Natura 2000 Site or key features of the Site;* *Resource requirements;* *Emissions;* *Excavation requirements;* *Transportation requirements;* *Duration of construction, operation etc.; and* *Other.*	The works will not involve a land take from any Natura 2000 site. There are 6 Natura 2000 sites within the zone of potential influence of the proposed works. The footprint of the development will be within the existing St. Cuthberts Park and there will be no habitat loss within Natura 2000 sites. ▪ Resources required include: – Machinery – transport vehicles – hand tools – Imported materials such as cement & asphalt **Potential emissions include:** – Fuel/oil or concrete spill – sedimentation of watercourse – fugitive noise and dust – waste The proposed project is in an urban area already subject to regular traffic noise. The primary emissions expected from the proposed development during construction phase are fugitive emissions of noise from the use of machinery and equipment and the increase in human activity for the duration of the works. Construction works will be temporary. They are anticipated to take approximately 9 to 12 months to complete. The operational phase of the project will continue indefinitely. No impact is envisaged as a result of the operational phase of this project. There are no other potential sources of impacts associated with the proposed development.

4.6 Assessment of Significance of Potential Impacts

This section considers the list of sites identified in **Table 4-2** together with the potential ecological impacts identified in the previous section and determines whether the project is likely to have significant effects on a Natura 2000 site. The evaluation takes cognisance of the scope, scale, nature and size of the project, its location relative to the Natura 2000 sites listed in **Table 4-2**, and the degree of connectedness that exists between the project and each Natura 2000 site's potential ecological receptors.

4.6.1 Natura 2000 within the zone of potential impact influence

Table 4-5 below assesses each site within the zone of potential influence as outlined in Figure 4-3. The likelihood of significant effects to a Natura 2000 site from the project was determined based on several indicators including:

- Water quality and resource;

- Habitat loss and/or alteration;
- Habitat or species fragmentation; and
- Disturbance and/or displacement of species.

The likelihood of significant cumulative/in-combination effects is assessed in Section 4.6.2.5 .

The Natura 2000 sites listed in Table 4-5 are within the zone of potential impact influence of the proposal and these sites are assessed in light of the indicators outlined above.

Table 4-5: Natura 2000 Sites Assessment

Natura 2000 Site	Proximity of subject site to nearest point of designated site (km)	Assessment
Rye Water Valley/Carton SAC	The SAC is located approximately 5.8km nothwest from the site	This designated site is located approximately 5.8km north west of the proposed development. The proposed project will not result in any habitat loss within this SAC. No direct or indirect pollution pathway occurs between the two sites. There are no watercourses on the site that could act as conduits for pollution. No SAC specific species were noted in the vicinity of the survey areas which could be an important habitat for the features of interest of this SAC. The proposed works will not displace species in the area and there are no significant negative impacts identified in relation to disturbance effects on the ecological integrity of this Natura 2000 site. It is not considered that the proposed project will have any impact on the habitats and species which are included in the site's key features of interest.
Glenasmole Valley SAC	The SAC is located approximately 8.3 south from the site	This SAC is located approximately 8.3 km from proposed development. As regards to this Natura 2000 site's Conservation Objectives, it is considered that no aspect of the proposed development has the potential to create significant habitat loss or alteration impacts on the Annex I habitat in question. There are no watercourses on the site that could act as conduits for pollution. No disturbance or displacement of species are anticipated by the proposed development as the site is present in an already built urban area. This site is not directly connected to surface water runoff associated with the proposed development and it is considered that no potential pollution pathway exists for the transport of nutrients or suspended sediments between the two.
Wicklow Mountains SAC	The SAC is situated approximately 13.7 southeast from the site	This designated site is located approximately 13.7 km from the proposed development. The proposed project will not result in any habitat loss within this SAC. No direct or indirect pollution pathway occurs between the two sites. There are no watercourses on the site that could act as conduits for pollution. No SAC specific species were noted in the vicinity of the survey areas which could be an important habitat for the features of interest of this SAC. The proposed works will not displace species in the areas and there are no significant negative impacts identified in relation to disturbance effects on the ecological integrity of this Natura 2000 site. It is not considered that the proposed project will have any impact on the habitats and species which are included in the site's key features of interest.
South Dublin Bay SAC	The SAC is located approximately 14 km east from the site	This SAC site is located approximately 14 km from the proposed development. The proposed project will not result in any habitat loss within this SAC. It is considered that no aspect of the proposed development has the potential to create significant impact on the habitats and species that this SAC site protects. No potential pollution pathway exists for the transport of nutrients or suspended material between the two areas in question. No corridor exists for the passage of species

Natura 2000 Site	Proximity of subject site to nearest point of designated site (km)	Assessment
		between this protected site and the proposed site. Given the distances between the sites, the urban nature of the habitats and the presence of exiting habitats in the area; there are no significant impacts identified to the populations of the SAC species. Due to the nature, scale and location of the development and the absence of any direct pathways for effects there are no impacts foreseen to the ecological integrity of the SAC.
Wicklow Mountains SPA	The SAC is located approximately 13.7km southeast from the site	This SPA is located approximately 13.7 km from proposed development. With regard to this Natura 2000 sites Conservation Objectives, it is considered that no aspect of the proposed development has the potential to result in habitat loss or alteration impacts within this SPA. This site is not connected to surface water runoff associated with the proposed development and it is considered that no potential pollution pathway exists for the transport of nutrients or suspended material between the two. Given the distances between the sites, the urban nature of the habitats and the availability of exiting habitats in the area; there are no significant impacts identified to the populations of the SPA species. The distance between the site and the SPA is sufficient to eliminate any potential disturbances to the SCIs of this SPA. Due to the nature, scale and location of the development and the absence of any direct pathways for effects there are no impacts foreseen to the ecological integrity of the SPA.
South Dublin Bay and River Tolka Estuary SPA	The SAC is located approximately 14km east from the site	This SPA site is located approximately 14 km from the proposed development. The proposed project will not result in any habitat loss within this SPA. It is considered that no aspect of the proposed development has the potential to create significant impact on the habitats and species that this SPA site protects. No potential pollution pathway exists for the transport of nutrients or suspended material between the two areas in question. There are no watercourses on the site that could act as conduits for pollution. Given the distances between the sites no significant impacts to the populations of the SPA SCIs have been identified. The distance between the site and the SPA is sufficient to eliminate any potential disturbances associated with the proposed works. Due to the nature, scale and location of the development and the absence of any direct pathways for effects there are no impacts foreseen to the ecological integrity of the SPA.
North Bull Island SPA	Approximately 16.0 km northeast of the site	This SPA site is located approximately 16 km from the proposed development. The proposed project will not result in any habitat loss within this SPA. It is considered that no aspect of the proposed development has the potential to create significant impact on the habitats and species that this SPA site protects. No potential pollution pathway exists for the transport of nutrients or suspended material between the two areas in question. Given the distances between the sites no significant effects identified to the populations of the SPA species. The distance between the site and the SPA is sufficient to eliminate any potential disturbances related to the proposed works. Due to the nature, scale and location of the development and the absence of any direct pathways for effects there are no adverse effects foreseen to the ecological integrity of the SPA.

4.6.1.1 Water Quality

There are some elements of the proposed works which could potentially result in impairment of water quality. In general, where works are conducted within proximity to water bodies, impairment of water quality may potentially occur as a result of run-off of sediment/fines or accidental fuel/oil spills from machinery/equipment.

These elements of the proposed development could therefore potentially result in pollution of the aquatic environment. All works will take place within the curtilage of the site and all fuels will be stored within secure, bunded and impermeable storage areas as part of standard practice. The area of the proposed new development is already developed. There are no watercourses on the site that could act as conduits for pollution. Water management on site during the operational phase will ensure that all stormwater drains to ground. All the drainage water will be percolated back to the site. Therefore, there will be no additional sources of potential sedimentation from the proposed development during the operation phase and as a result, no impacts on water quality are anticipated. Construction works will be undertaken in accordance with best practice measures.

The habitats and species of the Natura 2000 sites within 15 km distance are sensitive to changes in siltation loads, pollutants and water levels. The site-specific construction will not result in a significant risk to water quality downstream of the development. The proposed development at St. Cuthberts Park does not directly or indirectly drain to any Natura 2000 sites. The proposed works will not significantly alter the existing water flow at the site, or in the greater area. Consequently, it is objectively concluded that no significant adverse impacts on the Conservation Objectives of the nearby Natura 2000 sites will occur as a result of the programme of works described at Section 4.2 above, by means of adverse water quality impacts.

With regard to wastes arising, including packaging will be recycled where possible and/or removed to an authorised waste facility. Construction waste will be separated on site, recycled where possible. There will be no contamination of water as a result of wastes resulting from the upgrade to the park.

The evaluation takes into account the scope, scale, nature and size of the project, its location relative to the Natura 2000 sites and the degree of connectedness that exists between the proposed development and the Natura 2000 sites potential ecological receptor.

4.6.1.2 Habitat Loss and Alteration

The proposed development considered in this assessment occurs outside any Natura 2000 site, therefore, no direct habitat loss or alteration impacts within any Natura 2000 site, or to any Natura 2000 habitat type, are reasonably foreseeable. The works are restricted to the footprint of St. Cuthberts Park. No direct or indirect effects on any Natura 2000 sites are reasonably foreseeable.

Therefore, the proposed development described in this report will not result in significant habitat loss or alteration within any Natura 2000 site.

4.6.1.3 Disturbance and/or Displacement of Species

The proposed programme of works described in Section 4.2 above is relatively small in scale and size, requiring inputs of material, machinery, manpower and time. The site is 5.8km away from the nearest Natura 2000 site. Hence, pathways for direct disturbance are not present. It is considered that the qualifying interests, protected within these European sites will not be subjected to significant impacts from temporary fugitive noise, human activity, and machinery as a result of this proposed development. In conclusion, no significant disturbance or displacement impacts will occur on nearby Natura 2000 sites as a result of the proposed works at St. Cuthberts Park.

4.6.1.4 Habitat or species fragmentation

The preceding sub sections outlined that the proposed development at St. Cuthberts Park will not result in any significant direct/indirect habitat loss within any designated site, nor will there be any significant direct/indirect negative water quality impacts, along with the fact that there shall be no significant direct/indirect disturbance or

displacement of features of interest protected within nearby designated sites. Therefore, considering the conclusions in the preceding subsections and bearing in mind the scope, scale, duration and timing of the proposed works, it is concluded that no significant habitat or species fragmentation impacts on Natura 2000 sites within the Zone of Influence are reasonably foreseeable as a result of the proposed development considered in this document.

4.6.1.5 Identification of other plans/activities in the area and Cumulative/In-combination Impacts

As well as singular effects, the potential for in-combination or cumulative impacts also need to be considered. A cumulative impact arises from incremental changes caused by past, present and proposed projects together with the proposed development considered in this document.

The proposed development will take place at St. Cuthberts Park, Co. Dublin. Current grants of permission include works such as demolition, renovation and extensions to existing private dwellings, residential buildings and commercial buildings in the vicinity of St. Cuthberts Park (South Dublin County Council on-line planning enquiry system).

A desktop search of proposed and existing planning applications was undertaken on the 17/08/2022. The search flagged planning applications within a period dating back to 2017; any refused, invalid or withdrawn applications were omitted. Furthermore, any small-scale residential type developments, such as extensions and modifications, minor amendments to existing dwellings and changes of use developments were omitted from the search.

The findings show small-scale and medium to large-scale developments within the 1 km radius scope that have been approved or are on-going. The majority of planning applications within 1km of the proposed development are related to development of and alterations to residential properties and are considered to be small in scale. A summary of relevant developments considered in the cumulative assessment is given below:

- The construction of 569 dwellings, a creche, innovation hub and open space in the Clonburris South West Development Area of the Clonburris SDZ Planning Scheme 2019 (Planning ref: SDZ21A/0022) (Decision Date: 23/8/2022)
- 10 year permission for roads and drainage infrastructure works as approved under the Clonburris Strategic Development Zone Planning Scheme (2019) (Planning ref: SDZ20A/0021) (Decision Date: 12/08/2021);
- Construction of a 3 storey (part 4 storey) data centre known as 'DB8' (Planning ref: SD21A/0186) (Grant Date: 05/05/2022) southwest of the site;
- 1034 residential units comprising of (578 houses: 449 3-bed & 129 4-bed), 456 apartments: 142 1-bed, 224 2-bed, 90 3-bed), 2 childcare facilities (1 temporary, 1 permanent), 1 retail unit, 1 community facility and all associated site works. (Planning ref: SHD3ABP-305267-19) (Decision Date: 05/12/2021)
- Demolition of existing single storey dwelling (c.108.5sq.m); (2) construction of a Distribution Warehouse Building comprising warehousing and ancillary areas at ground floor and support offices, staff areas and plant across two floors; (3) the development will be accessed from the existing Profile Park estate road; (4) provision of car parking, cycle parking, security gatehouse, landscaping and boundary treatments (including security fencing and gates); (5) all associated site development and services works (including diversion/culverting/reprofiling of existing stream on site); (6) total gross floor area of the development c.17,006sq.m. (Planning ref: SD20A/0124) (Decision Date: 10/11/2020)
- Construction of two new three storey primary school buildings for Gaelscoil na Camoige agus Gaelscoil Chluain Dolcain providing 16 classrooms each, a shared general purpose area, ancillary teaching and staff

accommodation Connections to public utility and drainage services, boundary treatments, installation of PV panels, alterations to existing drainage layout and associated site development works. (Planning ref: SD22A/0328) (Decision Due Date: 3/10/2022)

The proposed development was considered in combination with other plans and projects in the area that could result in cumulative impacts on Natura 2000 sites. Other plans considered include:

- South County Dublin Development Plan 2022-2028
- Local Area Plans

No significant cumulative impacts are predicted with the plans listed above, as each plan has a range of environmental and natural heritage policy safeguards in place. These safeguards to protect the natural environment and Natura 2000 Sites will also apply to the proposed development described in this report.

The main land use activities within the area include urban development.

The preceding subsections have concluded that no significant direct, indirect or secondary impacts, particularly those that might occur as a result of poor water quality, are expected to ensue from the proposed development at St. Cuthberts Park. During the construction phase of the proposed development, the proposed development will be compliant with good working practices (Construction Best Practice).

It is considered, therefore, bearing in mind the scope, scale, nature, size and location of the project, the proposed development will not give rise to significant direct or indirect impacts, and are not expected to cause cumulative or in-combination impacts with other projects, on the qualifying interests of the nearby designated Natura 2000 sites.

4.7 Conclusion of Screening Stage

This screening for Appropriate Assessment was undertaken to determine the potential for likely significant effects of the proposed works, individually, or in combination with other plans or projects, in view of the conservation objectives of any Natura 2000 site. Seven Natura 2000 sites with the zone of potential influence were initially considered on the basis of their proximity to the proposed development site being within the 15km (as proposed in Scott Wilson et al., 2006). Following National Parks and Wildlife Service (NPWS) guidance (DoEHLG, 2009) this potential zone of influence was assessed on a case-by-case basis with consideration to the nature, size and location of the project, the sensitivities of the ecological receptors and the potential for cumulative effects on these sites and no further sites were deemed appropriate for consideration.

Rye Water Valley/Carton SAC, Glenasmole Valley SAC, Wicklow Mountains SAC, South Dublin Bay SAC, Wicklow Mountains SPA, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA were screened out for Appropriate Assessment on the basis of no significant potential for an ecological and/or hydrological impact from the proposed works at the project site, bearing in mind the precautionary principle and using the Source-Pathway-Receptor framework.

Reasons for Conclusion:

- There is no potential for impacts on the qualifying interests for which Natura 2000 sites are designated. As such, there will be no significant direct or indirect impact on qualifying habitats or species associated with any Natura 2000 sites;

- The lack of significant in-combination effects arising from other proposed and permitted developments in the vicinity.

Measures intended to avoid or reduce negative effects on the Natura 2000 sites have not been relied upon in reaching this conclusion.

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Appendix 1

Stages of Appropriate Assessment

Stage 1 - Screening

This is the first stage of the Appropriate Assessment process and that undertaken to determine the likelihood of significant impacts as a result of a proposed project or plan. It determines need for a full Appropriate Assessment.

If it can be concluded that no significant impacts to Natura 2000 Sites are likely then the assessment can stop here. If not, it must proceed to Stage 2 for furthermore detailed assessment.

Stage 2 - Natura Impact Statement (NIS)

The second stage of the Appropriate Assessment process assesses the impact of the proposal (either alone or in combination with other projects or plans) on the integrity of the Natura 2000 Site with respect to the conservation objectives of the site and its ecological structure and function. This is a much more detailed assessment that Stage 1. A Natura Impact Statement containing a professional scientific examination of the proposal is required and includes any mitigation measure to avoid, reduce or offset negative impacts.

If the outcome of Stage 2 is negative i.e. adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned.

Stage 3 - Assessment of alternative solutions

A detailed assessment must be undertaken to determine whether alternative ways of achieving the objective of the project/plan exists.

Where no alternatives exist the project/plan must proceed to Stage 4.

Stage 4 - Assessment where no alternative solutions exist and where adverse impacts remain

The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a Natura 2000 Site where no less damaging solution exists.