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Appropriate Assessment Screening Report

PRESENTED TO

Bartra Propco 23 Limited
Proposed Large-scale Residential Development at
Mountgorry, Swords, Co. Dublin

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1 INTRODUCTION

1.1 Background

Enviroguide Consulting was commissioned by Bartra Propco 23 Limited to prepare an Appropriate Assessment Screening Report for a Proposed Large-scale Residential Development at Mountgorry, Swords, Co. Dublin, hereafter referred to as 'Proposed Development' or 'Site' when referring to the site area of the Proposed Development. This report contains information to enable the Competent Authority to undertake Stage 1 Appropriate Assessment (AA) screening in respect of the Proposed Development.

1.2 Quality Assurance and Competence

Enviroguide Consulting is multi-disciplinary consultancy specialising in the areas of the Environment, Waste Management and Planning. All Enviroguide consultants carry scientific or engineering qualifications and have a wealth of experience working within the Environmental Consultancy sectors, having undergone extensive training and continued professional development.

Enviroguide Consulting as a company remains fully briefed in European and Irish environmental policy and legislation. Enviroguide staff members are highly qualified in their field. Professional memberships include the Chartered Institution of Wastes Management (CIWM), the Irish Environmental Law Association and Chartered Institute of Ecology and Environmental Management (CIEEM).

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants. SOB undertook the ecology surveys and desktop research and authored this report.

SOB has a B.A. in Zoology from Trinity College Dublin and a M.Sc. Hons. in Wildlife Conservation and Management from University College Dublin, and has experience in desktop research, report writing, and literature scoping-review, as well as practical field and laboratory experience (Pollinator surveying, sampling and identification, habitat surveying, invasive species surveying, etc.). SOB has prepared Stage I and Stage II Appropriate Assessment (AA) Reports, Invasive Species Surveys, Ecology Statements, Ecological Impact Assessments (EclAs), and Biodiversity Chapters of Environmental Impact Assessment Reports (EIARs).

1.3 Description of Proposed Development

1.3.1 Site Location

The Site of the Proposed Development, as seen in Figure 1, is located off the Swords to Malahide Road (R106), immediately adjacent to the Swords Road/Mountgorry Way roundabout, approximately 60m west of the M1. The access road to the Applegreen (Mountgorry) petrol station bounds the east of the Site, while an open green space and an industrial estate abuts the west and north of the Site, respectively. The general surroundings of the Site are urban in nature.

1.3.2 Proposed Development Description

Bartra Propco 23 Limited intend to apply for permission for development for a Large-scale Residential Development (LRD) at this c. 0.8731 Ha site fronting the Swords to Malahide Road (R106), Mountgorry, Swords, Co. Dublin. The Site is bounded to the west by open space, with Seamount View Housing Estate further beyond, to the south by the R106, to the east by an access road to the Applegreen Service Station and to the north by Swords Business Park.

The development's surface water drainage network shall discharge from the Site into the respective existing manhole located along the access road to the east of the Site. The development Site area and drainage work areas will provide a total application Site area of c. 0.8792 Ha.

The Proposed Development will principally consist of: the construction of 123 No. residential units (55 No. one bed apartments and 68 No. two bed apartments). The development will be provided in a courtyard block arrangement ranging in height from part 4 No. to part 5 No. storeys. The Proposed Development has a gross floor area of c. 10,291 sq m.

The Proposed Development will also provide: vehicular access from the access road to the east; 24 No. car parking spaces; bicycle parking spaces; motorcycle parking spaces; pedestrian/cycle entrances at the south-west and north of the Site, and along the western boundary connecting into the adjoining open space; a footpath and bicycle path around the south, east and north of the Site perimeter and a shared cycle/pedestrian path along the western boundary; balconies and terraces facing all directions; hard and soft landscaping; boundary treatments; green roofs; lift overrun; PV panels; lighting; ESB substation; switchroom; plant; and all associated works above and below ground.

1.3.3 Drainage and Water Supply

1.3.3.1 Surface water

As outlined in the Engineering Services Report (O'Connor Sutton Cronin (OCSC), 2024) accompanying this application, while the Site of the Proposed Development is a greenfield site, an existing surface water drainage network runs in a northerly direction along the east boundary of the Site, with an additional surface water sewer crossing the southeast corner of the Site. It is proposed that surface water run-off from the Site will discharge to the existing surface water network located to the northeast of the Site during the Operational Phase after passing through the surface water management system outlined in the Engineering Services Report (OCSC, 2024) and summarised below.

It is proposed that Sustainable Drainage Systems (SuDS) features will be incorporated into the Proposed Development, including:

- pervious paving underlying the car parking spaces,
- a combination of blue and green roofs to intercept and retain rainfall which will slow the rate of surface water run-off into the local surface water network,
- tree pits to collect surface water run-off,

- filter drains along the west boundary of the Site bordering the existing green space,
- a detention basin within the northeast of the Site with 100m³ storage capacity prior to discharging via flow control manhole to the existing surface water network, and
- all drainage outside the building extent will pass through flow control devices prior to discharge to the local surface water drainage network.

Due to the Site location, it is likely surface water from the Proposed Development will ultimately enter Malahide estuary via the local surface sewer network.

1.3.3.2 Foul Drainage

As outlined in the Engineering Services Report (OCSC, 2024) accompanying this application, while a foul water sewer runs along the R106 to the south of the Site, there is also an existing foul water sewer to the northeast of the Site. It is proposed to discharge foul water from the Site to the foul water sewer network to the northeast of the Site. This foul water will be treated at the Swords Wastewater Treatment Plant (WwTP) and ultimately discharged to Malahide estuary.



FIGURE 2. PROPOSED SITE LAYOUT DRAWING NO. 2808-MOU-COA-ZZZ-ZZZ-DR-AR-0503 (COADY ARCHITECTS, 2024).

2 LEGISLATIVE AND POLICY CONTEXT

2.1 Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs). The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011).

It is the responsibility of each Member State to designate SPAs and SACs, both of which will form part of the Natura 2000 Network, a network of protected sites throughout the European Community. These designated sites are referred to as “Natura 2000 sites” or “European sites”. SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the sites; from these the conservation objectives of the site are derived.

An AA is a required assessment to determine the likelihood of significant effects, based on best scientific knowledge, of any plans or projects on European sites. A screening for AA determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant effects on a European site, in view of its conservation objectives.

This AA Screening has been undertaken to determine the potential for significant effects on relevant European sites. The purpose of this assessment is to determine, the appropriateness, or otherwise, of the Proposed Development in the context of the conservation objectives of such sites.

2.1.1 Legislative Context

The obligations in relation to Appropriate Assessment have been implemented in Ireland under Part XAB of the Planning and Development Act 2000, as amended (“the 2000 Act”), and in particular Section 177U and Section 177V thereof. The relevant provisions of Section 177U in relation to AA screening have been set out below:

“177U.— (1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

(2)...

(3)...

(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is required if it cannot be excluded, on the basis of objective information, that the draft Land use plan or proposed development,

individually or in combination with other plans or projects, will have a significant effect on a European site.

(5) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is not required if it can be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.”

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

“6(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site, in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

According to the ruling delivered in open court in Luxembourg on 15th June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

“In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site”.

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS) in large-scale residential developments), that are incorporated into the design of a proposal or project and which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is not to protect a European site, are permitted for consideration during the undertaking of AA.

2.2 Policy Context

2.2.1 Fingal Development Plan 2023-2029

Policies and objectives of the Fingal Development Plan (DP) 2023-2029 that are of relevance to this Screening Report are outlined below:

- **Policy GINHP5:** *“Develop the green infrastructure network to ensure the conservation and enhancement of biodiversity, including the protection of European Sites, the provision of accessible parks, open spaces and recreational facilities (including allotments and community gardens), the sustainable management of water, the*

maintenance of landscape character including historic landscape character and the protection and enhancement of archaeological and heritage landscapes.”

- **Objective GINHO2:** *“Reduce fragmentation and enhance the resilience of Fingal’s green infrastructure network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider green infrastructure network.”*
- **Policy GINHP12:** *“Protect areas designated or proposed to be designated as Natura 2000 sites (i.e., Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, and Refuges for Fauna.”*
- **Objective GINHO27:** *“Support the National Parks and Wildlife Service, in the maintenance and achievement of favourable conservation status for the habitats and species in Fingal by taking full account of the requirements of the Habitats and Birds Directives, in the performance of its functions.”*
- **Objective GINHO28:** *“Ensure that development does not have a significant adverse impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, and on rare and threatened species including those protected by law and their habitats.”*
- **Policy GINHP17:** *“Strictly protect areas designated or proposed to be designated as Natura 2000 sites (i.e., Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); also known as European sites) including any areas that may be proposed for designation or designated during the lifetime of this Plan.”*
- **Objective GINHO35:** *“In accordance with Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities 2010, any plans or projects that are likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects, are subject to a screening for Appropriate Assessment unless they are directly connected with or necessary to the management of a Natura 2000 site.*
- **Objective GINHO79:** *“Ensure that there is appropriate public access to the coast including the provision of coastal walkways and cycleways, while taking full account of the need to conserve and enhance the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on European Sites and species protected by law, through Screening for Appropriate Assessment, and examine the designation of traditional walking routes thereto as public rights of way.”*

2.2.2 Fingal Biodiversity Action Plan 2022-2030

Fingal Biodiversity Action Plan (BAP) 2022-2030 is set out to protect and improve biodiversity through six topics:

- Delivery of the Ecological Network across Fingal;
- Building for Biodiversity;
- Climate change adaption and mitigation;
- Agri environment schemes and rewilding;
- Research & monitoring; and
- Raising awareness.

2.3 Stages of Appropriate Assessment

This AA Screening Report (the 'Screening Report') has been prepared by Enviroguide Consulting. It considers whether the Proposed Development is likely to have a significant effect on a European site and whether a Stage 2 AA is required.

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

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

- **Stage 1: Screening.** The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.
- **Stage 2: Natura Impact Statement (NIS).** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site(s) despite mitigation, it can only grant consent after proceeding through stages 3 and 4.
- **Stage 3: Assessment of alternative solutions.** If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.
- **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.** The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

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

3 AA SCREENING METHODOLOGY

3.1 Guidance

This Screening Report has been undertaken in accordance with the following guidance:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision);
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10;
- *Communication from the Commission on the precautionary principle* (European Commission, 2000);
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019);
- *Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC* Brussels, 28.9.2021 C (European Commission, 2021); and
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021.*

3.2 Screening Steps

Screening for AA involves the following steps:

- Establish whether the plan or project is directly connected with or necessary for the management of a European site;
- Description of the baseline existing environment at the Site of the Proposed Development;
- Identification of relevant European site(s) potentially affected;
- Identification and description of potential effects on the relevant European site(s);
- Assessment of the likely significance of the effects identified on the relevant European site(s);
- Description and characterisation of other projects or plans that in combination with the Proposed Development have the potential for having significant effects on the European site; and
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

It should be noted that any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site **have not been considered** as part of this Screening Report.

3.3 Desk Study

A desktop study was carried out to collate and review available information, datasets and documentation sources relevant for the completion of this Screening Report. The desktop study relied on the following sources:

- Information on the network of European Sites, boundaries, QIs and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie;
- Text summaries of the relevant European sites taken from the respective Standard Data Forms (available at <https://natura2000.eea.europa.eu/>) and Site Synopses (available at www.npws.ie);
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.gis.epa.ie;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at www.gsi.ie;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Bing and Ordnance Survey Ireland; and
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the Proposed Development from the National Planning Database (DHLGH, 2024).

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

3.4 Identification of Relevant European sites

The Zone of Influence (ZOI) for a project is the area over which ecological features may be affected by changes as a result of a development and associated activities. This is likely to extend beyond the development site, for example where there are ecological or hydrological links beyond the site boundaries (CIEEM, 2018). Furthermore, ZOI in relation to European sites is described as follows in the 'OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management' (OPR, 2021):

"The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km)."

Thus, to identify the European sites that potentially lie within the ZOI of the Proposed Development, a Source-Path-Receptor (S-P-R) method was adopted, as described in OPR PN01 (OPR 2021). This note was published to provide guidance on screening for AA during the planning process, and although it focuses on the approach a planning authority should take in screening for AA, the methodology is also readily applied in the preparation of Screening Reports such as this.

The relevant European sites were identified based on the following:

- Identification of potential sources of effects based on the Proposed Development description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by SCI bird species outside of their designated SPAs);
- Use of up-to-date GIS spatial datasets for European designated sites and water catchments – downloaded from the NPWS website (www.npws.ie) and the EPA website (www.epa.ie) to identify European sites which could potentially be affected by the Proposed Development; and
- Identification of potential pathways between the Site of the Proposed Development and any European sites within the ZOI of any of the identified sources of effects.
 - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Development and any European sites.
 - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Development and any European sites.
 - Air and land connectivity assessed based on Proposed Development details and proximity to European sites.
 - Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.
- Defining the likely ZOI based on the identified sources of effects and potential pathways between the Proposed Development and any European sites.

3.5 Assessment of Significant Effects

The conservation objectives of the European sites identified to lie within the ZOI were reviewed and assessed in order to establish whether the construction and operation of the Proposed Development has the potential to have a negative impact on any of the QIs and/or conservation objectives listed for the site.

The assessment framework is taken from the best practice guidelines issued by the European Commission, i.e., “*Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*”.

The potential for significant effects that may arise from the Proposed Development was considered through the use of key indicators:

- Habitat loss or alteration.
- Habitat/species fragmentation.
- Disturbance and/or displacement of species.
- Changes in population density.
- Changes in water quality and resource.

In addition, information pertaining to the conservation objectives of the European sites, the ecology of the designated habitats and species and known or perceived sensitivities of the habitats and species were considered.

3.6 Limitations

No limitations were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Development on the relevant European sites.

4 STAGE 1 SCREENING ASSESSMENT

4.1 Existing Environment

4.1.1 Desk Study Results

4.1.1.1 Hydrology, Geology and Hydrogeology

The Site of the Proposed Development is within the *Liffey and Dublin Bay* catchment (Catchment ID: 09) and within the *Mayne_SC_010* (Sub-Catchment ID: 09_17) sub-catchment (EPA, 2024). The closest mapped watercourse to the Site is a first order stream, known as Greenfields Stream (EU Code: IE_EA_08G080700), approximately 440m northwest of the Site, which enters Malahide Estuary, specifically the Broadmeadow Water transitional waterbody (EU Code: IE_EA_060_0100), 1km northeast of the Proposed Development.

During the most recent survey period of 2016 – 2021, the Greenfields Stream was assigned a ‘*Poor*’ ecological status, while the Malahide Estuary was assigned a ‘*Moderate*’ ecological status, and is currently ‘*At Risk*’ of not meeting its Water Framework Directive (WFD) objectives. The Greenfields Stream does not have an EPA monitoring station.

The Site is situated within the *Dublin* (EU Code: IE_EA_G_008) groundwater body, which is currently under review as to whether it will meet its WFD objectives. The aquifer type underlying the Site is ‘*Locally Important*’ (LI) on bedrock which is ‘*Moderately Productive in Local Zones Only*’. The groundwater rock units underlying the Site are classified as ‘*Dinantian Lower Impure Limestones*’ (GSI, 2024).

The level of vulnerability of the Site to groundwater contamination via human activities is ‘*Low*’ (L). The soil on Site is classified as Crosstown, and the subsoil is Limestone till (Carboniferous) (TLs) (EPA, 2024).

The Waterbody Status for river, transitional and groundwater water bodies relevant to the Site as recorded by the EPA (2024) in accordance with European Communities (Water Policy) Regulations 2003 (SI no. 722/2003) are provided in Table 1.

TABLE 1. WFD RISK AND WATER BODY STATUS

Waterbody Name	Water body; EU code	Location from Site	Distance from Site	WFD water body status (2016-2021)	WFD 3 rd cycle Risk Status	Hydraulic Connection to the Site
Surface Water Bodies						
Greenfields Stream	IE_EA_08 G080700	Northwest	440m	Poor	Under Review	Yes, via potential surface water run-off from the Site of the Proposed Development
Transitional Water Bodies						
Malahide Estuary	IE_EA_060_0100	Northeast	1.km	Moderate	At Risk	Yes, via surface water run-off from the Site of the Proposed Development
Groundwater Bodies						

Waterbody Name	Water body; EU code	Location from Site	Distance from Site	WFD water body status (2016-2021)	WFD 3 rd cycle Risk Status	Hydraulic Connection to the Site
Dublin	IE_EA_G_008	N/A	N/A	Good	Under Review	Underlying groundwater-body

4.2 Identification of Relevant European Sites

4.2.1 Potential Sources of Impacts

The Proposed Development is not directly connected with or necessary to the management of European sites. However, the following elements of the Proposed Development were identified and assessed for their potential to cause likely significant effects on European sites.

Construction Phase

- Uncontrolled releases of dust, sediments and/or other pollutants to air due to earthworks;
- Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies or surface water network;
- Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater;
- Waste generation during the Construction Phase comprising soils and construction wastes;
- Increased noise, dust and/or vibrations as a result of construction activity;
- Increased dust and air emissions from construction traffic;
- Increased lighting in the vicinity as a result of construction activity; and
- Increased human presence and activity as a result of construction activity.

Operational Phase

- Surface water drainage from the Site of the Proposed Development;
- Foul water from the Proposed Development;
- Increased lighting at the Site and in the vicinity emitted from the Proposed Development;
- Bird collision risks for flightlines due to the proximity of SPAs, and
- Increased human presence and activity at the Site and in the vicinity as a result of the Proposed Development.

4.2.2 Potential Pathways to European Sites

For the above listed potential sources of effects to have the potential to cause likely significant effects on any European site, a pathway between the source of potential effects (i.e., the Site of the Proposed Development) and the receptor is required. Potential impact pathways are discussed in the following sections in the context of the identified impact sources as identified in section 4.2.1.

4.2.2.1 Direct Pathways

4.2.2.1.1 Hydrological pathways

There are no drainage ditches or surface waterbodies within or immediately adjacent to the Site. The closest waterbody to the Site is the Greenfields Stream 440m northwest of the Proposed Development Site. Therefore, there is no potential for the propagation of significant effects to any European sites via a hydrological pathway during the Construction Phase. However, during the Operational Phase, surface water from the Site will be discharged into the existing local surface water network, before ultimately discharging to the Malahide Estuary. Therefore, this constitutes a hydrological connection with **Malahide Estuary SAC (000205)** and **Malahide Estuary SPA (004025)**.

However, this pathway is considered weak and insignificant. The surface water from the Site will pass through filter drains and underground attenuation within the Proposed Development Site. Therefore, these embedded design features will remove potential pollutants from surface waters prior to discharge to the local surface water drainage network. Therefore, there are no hydrological connections of note to any European sites.

4.2.2.1.2 Hydrogeological pathways

During groundworks and other Construction Phase activities, the ground will be exposed and any potential accidental discharges to ground could potentially migrate vertically downward to the underlying bedrock aquifer and laterally within the aquifer to Malahide Estuary, and therefore reach **Malahide Estuary SAC (000205)** and **Malahide Estuary SPA (004025)**.

However, the underlying aquifer is described as being '*Locally Important*' (LI) on bedrock which is '*Moderately Productive in Local Zones Only*'. As per the groundwater report for the Dublin groundwater body, "*Flow path lengths are not considered to be on a regional scale, and are typically less than 1km in length. Groundwater discharges to the numerous streams and rivers crossing the aquifer, and to the springs and seeps towards the coast*" (GSI, 2004). As such, groundwater will likely reach the Greenfields Stream northwest of the Site rather than directly entering the Malahide Estuary and contribute to this potential hydrological pathway. In addition, the groundworks for the Proposed Development will be traditional in nature and will only involve relatively shallow excavations for the foundations and drainage networks. Therefore, there is no potential for significant impacts on any European sites propagated via a hydrogeological pathway during Construction.

During Operation, a range of SuDS measures will be in place at the Site to capture surface water as outlined in section 1.3.3.1. As per the Engineering Services Report (O'Connor Sutton Cronin (OCSC), 2024) accompanying this application, the use of pervious paving, blue and green roofs, tree pits, and a detention basin will seek to achieve interception storage. As a result, water generated at the Site during Operation will undergo attenuation measures including the removal any sediments or chemical pollutants prior to its discharge from the Site at greenfield rates. Thus, there is no potential for significant impacts on any European sites propagated via a hydrogeological pathway during Operation.

4.2.2.1.3 Air and land pathways

No air or land pathways from the Proposed Development to any European sites were identified. Construction-related disturbance and displacement of fauna species could potentially occur within the vicinity of the Proposed Development. For mammal species such

as Otter, disturbance effects would not be expected to extend beyond 150m¹. For birds, disturbance effects would not be expected to extend beyond a distance of c. 300m, as noise levels associated with general construction activities would attenuate to close to background levels at that distance². There are no European sites within the disturbance Zol; the nearest European sites to the Proposed Development are the Malahide Estuary SAC (000205) and Malahide Estuary SPA (004025) approx. 1.1km northeast, and therefore this is deemed sufficient to exclude any potential for impacts from increases in noise, lighting and/or dust or other airborne pollutants.

4.2.2.2 Indirect Pathways

4.2.2.2.1 Hydrological pathways

The Site of the Proposed Development will be connected to the existing public foul sewer. Therefore, there is a weak hydrological link between the Site and **Malahide Estuary SAC (000205)** and **Malahide Estuary SPA (004025)** via discharges from Swords WwTP during the Operational Phase. European sites beyond Malahide Estuary, such as North-West Irish Sea SPA (004236), have been disregarded due to distance and dilution factors within the estuary and the downstream marine habitats.

The potential for foul waters generated at the Site of the Proposed Development to reach designated sites in Malahide Estuary and cause significant effects, during the Operational Phase, is negligible due to:

- The Swords WwTP has additional hydraulic capacity and organic capacity, as the current annual max hydraulic loading is 60.9% of the peak hydraulic capacity as constructed, and the collected organic load is 84.4% of the organic capacity as constructed (Irish Water, 2022).
- The discharges from the wastewater treatment plant does not have an observable negative impact on the WFD status of the receiving waterbody (Irish Water, 2022).

4.2.2.2.2 Air and land pathways

No indirect pathways (e.g., disruptions to migratory paths) were identified.

The Site does not offer *ex-situ* habitat for the bird species of Special Conservation Interest (SCI) associated with the Malahide Estuary SPA (004025) due to the relatively small size of the Site, the habitats recorded on Site, and the intervening suitable *ex-situ* habitats between the Site and this designated site.

¹ This is consistent with Transport Infrastructure Ireland (TII) guidance (Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes (2006) and Guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes (2005)) documents. This is a precautionary distance, and likely to be moderated by the screening effect provided by surrounding vegetation and buildings, with the actual Zol of construction related disturbance likely to be much less in reality.

² This is based on the relationship between the noise levels generated by general construction traffic/works (BS 5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1 Noise) and the proximity of those noise levels to birds – as assessed in Cutts, N. Phelps, A. & Burdon, D. (2009) *Construction and Waterfowl: Defining Sensitivity, Response, Impacts and Guidance*, and Wright, M., Goodman, P & Cameron, T. (2010) Exploring Behavioural Responses of Shorebirds to Impulsive Noise. *Wildfowl* (2010) 60: 150–167. At 300m, noise levels are below 60dB or, in most cases, are approaching the 50dB threshold below which no disturbance or displacement effects would arise.

4.2.2.2.2.1 Likelihood of Collision Impacts

From a review of available literature on the subject, bird collisions with man-made structures are common and well documented³ with migratory passerine species the most prevalent collision victims⁴. Bird collision with buildings is generally associated with reflective material such as windows or large surfaces of glass which create a mirror and appear to show the continuation of the sky or surrounding landscape, an effect that can be exacerbated by lighting.

In addition, the physical location of buildings and structures can influence the likelihood of bird collisions, with structures placed on or near areas regularly used by large numbers of feeding, breeding, or roosting birds, or on local flight path; such as those located between important foraging and roosting areas, can present a higher risk of collision.

The Site in itself is not deemed to represent suitable *ex-situ* feeding/roosting habitat for any such species (Habitats present largely comprise of dense grassland and scrub). However, it should be noted that the Site is located approx. 1.1km from the Malahide Estuary SPA, which is designated for the protection of wetland bird populations.

4.2.2.2.2.2 Building Appearance

Whilst the design of the facades of the dwellings do include windows, no large surfaces of glass are proposed. Rather the overall façades of the proposed buildings are well broken up, with a varied material composition interspersing any reflective areas. These architectural design features provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. This overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is negligible. These architectural design features are part of the overall design of the Proposed Development and are not considered to represent specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard. It is noted that birds are not deemed to be at any particular risk of collisions with the proposed buildings at the Site.

As such, based on the physical appearance of the proposed structures and the nature of their location, it is deemed that birds including any 'at-risk' species, do not have the potential to be impacted by the Proposed Development in terms of collisions and the risk is therefore deemed to be **imperceptible** in the absence of any mitigation.

³ Banks, R.C (1979). Human related mortality of birds in the United States. U.S. Fish Wildl. Serv. Spec. Sci. Rep. Wildl. 215. 16 pp.

Jenkins, A., Smallie, J.J. and Diamond, M. (2010). Avian collisions with power lines: A global review of causes and mitigation with a South African perspective. *Bird Conservation International*, 20(03), 263 – 278.

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Erickson, W.P., Johnson, G.D. and Young, P.D. (2005). A Summary and Comparison of Bird Mortality from Anthropogenic Causes with an Emphasis on Collisions. USDA Forest Service Gen. Tech. Rep. PSW-GTR-191. 2005.

Erickson, W. P., G. D. Johnson, M. D. Strickland, D. P. Young, Jr., K. J. Sernka, and R. E. Good. (2001). Avian collisions with wind turbines: A summary of existing studies and comparisons to other sources of avian collision mortality in the United States. National Wind Coordinating Committee, c/o RESOLVE, Inc., Washington, D.C.

⁴ Bing G.-C., Choi C.-Y., Nam H.-Y., Park J.-G., Hong G.-P., Sung J.-K., Chae H.-Y & Choi Y.-B. (2012). Causes of mortality in birds at stopover islands. *Korean J. Ornithol.*, 19, 23–31.

Longcore, T. Rich, C., Mineau, P., MacDonald, B., Bert, D.G., Sullivan, L.M., Mutrie, E., et al. (2013). Avian mortality at communication towers in the United States and Canada: which species, how many, and where? *Biological Conservation*, 158, 410-419.

4.2.2.2.3 Building Height

With respect to SCI birds for the SPA within the zone of influence of the Proposed Development which regularly use or travel over inland areas (i.e. waders such as oystercatcher) in Swords, they navigate the urban environment with built structures daily.

To put some context on some of their avoidance capabilities, in a different setting and for use in collision risk modelling for onshore wind turbines, an avoidance rate of 99.5% is applied for large gull species and an avoidance rate of 99.2% is applied for small gull species (Furness, 2019) which essentially means that 99.5% and 99.2% of gull flights, respectively, will avoid collision with a moving turbine. For curlew the avoidance rate applied is 98% (SNH, 2018).

The risk of collision is even less with a static, clearly detectable building. The proposed buildings consist of glazing, broken up with with a varied material composition interspersing any reflective areas. While the presence of the Proposed Development might alter flight patterns of bird species slightly to avoid the proposed building structures the risk of collision is extremely low.

The Proposed Development entails the construction of relatively low level residential buildings ranging in height up to five storeys, and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be negligible (Migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020).

It is considered that birds that fly over the Site to commute between feeding grounds at various locations would fly lower than this, however, once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds would simply fly around or over them.

4.2.3 Relevant European sites

A European site will only be at risk from likely significant effects where a S-P-R link exists between the Proposed Development Site and the European site. The preceding steps did not identify any S-P-R links of note, and therefore no further assessment is required. European sites which were considered for S-P-R linkages to the Site are listed in Table 2.

TABLE 2. EUROPEAN SITES CONSIDERED WITH THE SOURCE-PATHWAY-RECEPTOR (S-P-R) METHOD TO ESTABLISH NOTABLE LINKS BETWEEN THE SOURCES OF EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT, AND ANY RELEVANT EUROPEAN SITES. THOSE SITES WITH NOTABLE S-P-R LINKS ARE HIGHLIGHTED IN GREEN (IF ANY). QUALIFYING INTERESTS (QIS) TAKEN FROM THE RELEVANT CONSERVATION OBJECTIVES DOCUMENTS (AS REFERENCED) AND/OR THE STANDARD DATA FORMS (EEA, 2024)⁵.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
Special Areas of Conservation (SAC)		
<p>Malahide Estuary SAC (000205)</p> <p>Linear Distance to Proposed Development: approx. 1.1km NE</p>	<p>As per NPWS (2013a)</p> <p>Habitats</p> <p>1140 Mudflats and sandflats not covered by seawater at low tide</p> <p>1310 Salicornia and other annuals colonising mud and sand</p> <p>1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</p> <p>1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)</p> <p>2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes)</p> <p>2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)*</p>	<p>Weak hydrological pathway via the Malahide Estuary, deemed insignificant.</p> <p>No other potential pathways identified.</p>
Special Protection Areas (SPAs)		
<p>Malahide Estuary SPA (004025)</p> <p>Linear Distance to Proposed Development: approx. 1.1km NE</p>	<p>As per NPWS (2013b)</p> <p>SCI Birds</p> <p>A005 Great Crested Grebe (<i>Podiceps cristatus</i>)</p> <p>A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)</p> <p>A048 Shelduck (<i>Tadorna tadorna</i>)</p> <p>A054 Pintail (<i>Anas acuta</i>)</p> <p>A067 Goldeneye (<i>Bucephala clangula</i>)</p> <p>A069 Red-breasted Merganser (<i>Mergus serrator</i>)</p> <p>A130 Oystercatcher (<i>Haematopus ostralegus</i>)</p> <p>A140 Golden Plover (<i>Pluvialis apricaria</i>)</p> <p>A141 Grey Plover (<i>Pluvialis squatarola</i>)</p> <p>A143 Knot (<i>Calidris canutus</i>)</p> <p>A149 Dunlin (<i>Calidris alpina</i>)</p> <p>A156 Black-tailed Godwit (<i>Limosa limosa</i>)</p> <p>A157 Bar-tailed Godwit (<i>Limosa lapponica</i>)</p> <p>A162 Redshank (<i>Tringa totanus</i>)</p> <p>A999 Wetland and Waterbirds</p> <p>Additional species as per SDF update (2020a)</p> <p>A017 Cormorant (<i>Phalacrocorax carbo</i>)</p> <p>A052 Teal (<i>Anas crecca</i>)</p> <p>A053 Mallard (<i>Anas platyrhynchos</i>)</p> <p>A059 Pochard (<i>Aythya ferina</i>)</p> <p>A137 Ringed Plover (<i>Charadrius hiaticula</i>)</p> <p>A142 Lapwing (<i>Vanellus vanellus</i>)</p> <p>A144 Sanderling (<i>Calidris alba</i>)</p> <p>A145 Little Stint (<i>Calidris minuta</i>)</p> <p>A147 Curlew Sandpiper (<i>Calidris ferruginea</i>)</p> <p>A151 Ruff (<i>Philomachus pugnax</i>)</p> <p>A160 Curlew (<i>Numenius arquata</i>)</p>	<p>Weak hydrological pathway via the Malahide Estuary, deemed insignificant.</p> <p>No <i>ex-situ</i> habitat for SCI birds on Site.</p> <p>No other potential pathways identified.</p>

⁵ Where applicable, the full species list included in this table is as per the latest updated information as indicated, so either the Conservation Objectives (CO) document for the site, or the latest Standard Data Form (SDF) (EEA, 2023). For SDF updates, CO are not yet available for the newly added species but are assumed, for the purposes of assessment, to follow the same format as for other feature species.

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Potential Pathways
	A164 Greenshank (<i>Tringa nebularia</i>) A165 Green Sandpiper (<i>Tringa ochropus</i>) A169 Ruddy Turnstone (<i>Arenaria interpres</i>) A179 Black-Headed Gull (<i>Larus ridibundus</i>) A182 Common Gull (<i>Larus canus</i>)	
North-West Irish Sea SPA (004236) Linear Distance to Proposed Development: approx. 5.5km E	As per NPWS (2023) SCI Birds A065 Common Scoter (<i>Melanitta nigra</i>) A001 Red-throated Diver (<i>Gavia stellata</i>) A003 Great Northern Diver (<i>Gavia immer</i>) A009 Fulmar (<i>Fulmarus glacialis</i>) A013 Manx Shearwater (<i>Puffinus puffinus</i>) A018 Shag (<i>Phalacrocorax aristotelis</i>) A017 Cormorant (<i>Phalacrocorax carbo</i>) A177 Little Gull (<i>Larus minutus</i>) A188 Kittiwake (<i>Rissa tridactyla</i>) A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) A182 Common Gull (<i>Larus canus</i>) A183 Lesser Black-backed Gull (<i>Larus fuscus</i>) A184 Herring Gull (<i>Larus argentatus</i>) A187 Great Black-backed Gull (<i>Larus marinus</i>) A195 Little Tern (<i>Sterna albifrons</i>) A192 Roseate Tern (<i>Sterna dougallii</i>) A193 Common Tern (<i>Sterna hirundo</i>) A194 Arctic Tern (<i>Sterna paradisaea</i>) A204 Puffin (<i>Fratercula arctica</i>) A200 Razorbill (<i>Alca torda</i>) A199 Guillemot (<i>Uria aalge</i>)	Weak hydrological pathway via the Malahide Estuary, deemed insignificant. No <i>ex-situ</i> habitat for SCI birds on Site. No other potential pathways identified.

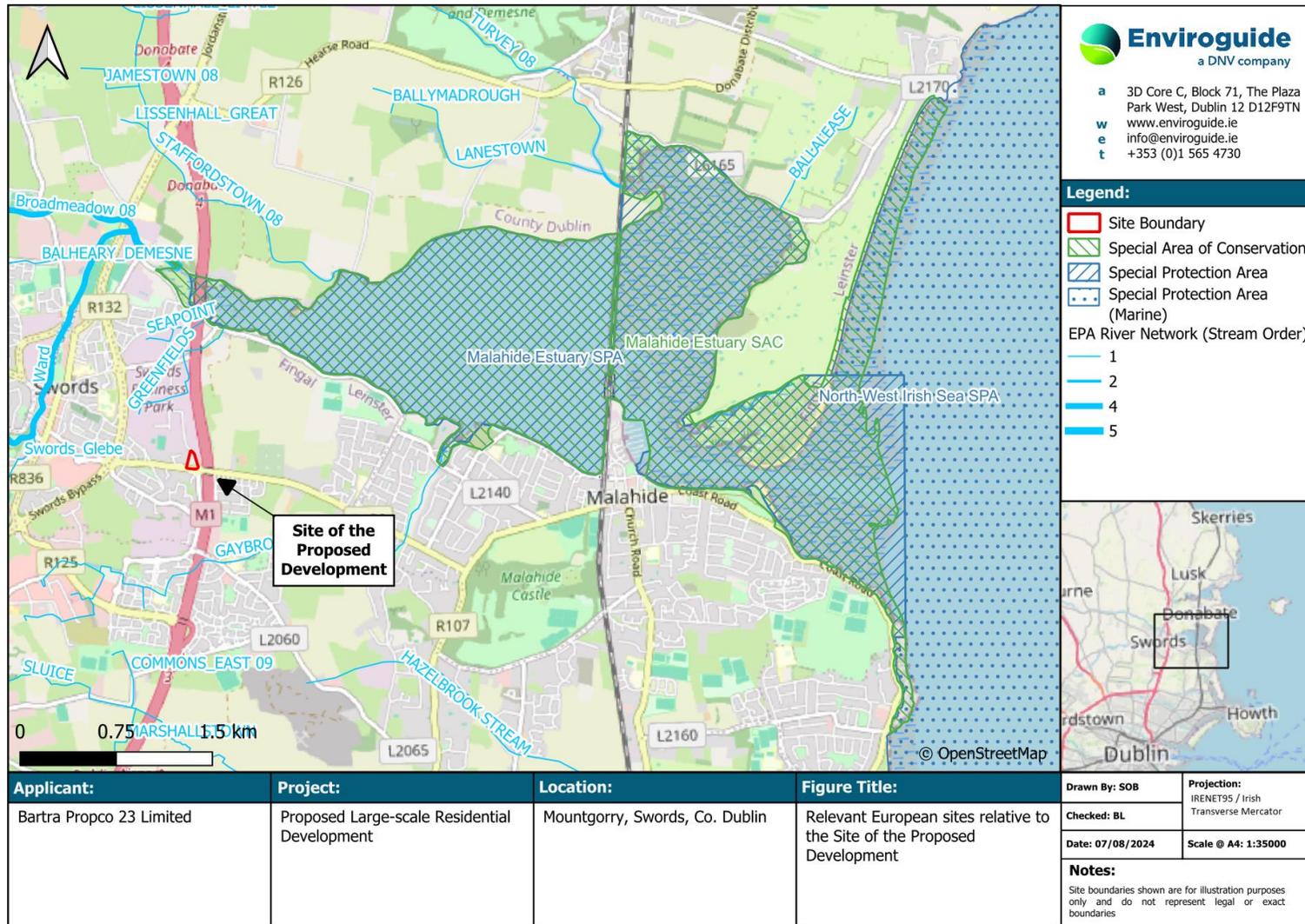


FIGURE 3. LOCATION OF EUROPEAN SITES RELATIVE TO THE PROPOSED DEVELOPMENT.

4.3 Assessment of Likely Significant Effects

As stated in the preceding section, no S-P-R links of note between the Proposed Development and any European sites were identified, and therefore no further assessment is required to assess the potential for significant impacts from the Proposed Development alone.

4.3.1 Potential for In-combination Effects

4.3.1.1 Existing Planning Permissions

Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable.

There are several existing planning permissions on record in the area, approximately 500m surrounding the Site, ranging from small-scale extensions and alterations to existing residential and commercial properties to larger-scale developments. The larger scale developments identified either within 500m of the Proposed Development or which may also have a hydrological connection to the downstream European sites via surface water discharges are outlined in Table 3.

TABLE 3. GRANTED AND PENDING DEVELOPMENT APPLICATIONS WITHIN 500M OF THE PROPOSED DEVELOPMENT. LOCATION AND DISTANCE GIVEN IS RELATIVE TO THE PROPOSED DEVELOPMENT.

Planning Reference	Planning Authority	Status	Location
F24A/0159	Fingal County Council	Granted Permission & Grant Retention	295m SW
<p>Development Description</p> <p>Permission and retention permission for the re-organisation of on-site carsite car parking to increase of the total number of permitted car parking from 346 No. spaces to 416 No. spaces at MSD International GmbH (MSD Biotech Dublin), Drynam Road, Berrysparks, Swords, Co. Dublin. The proposed development includes:</p> <ol style="list-style-type: none"> 1. Retention permission for restoration of car parking spaces required to be removed under planning registration reference F18A/0198 together with realignment of the internal road network of the car park adjacent to the Drynam Road (North) campus entrance to provide a total of 240 No. spaces; 2. Permanent permission for 172 No. spaces and associated works located in the existing temporary construction car park adjacent to the Holywell Road (South) campus entrance; 3. Removal of 170 No. spaces from the permitted central car park area and use of this area to an open service yard and staging area; 4. Provision of a covered cycle store to accommodate 30 No. cycle spaces positioned to the south of the Drynam road car park; 5. Retention permission for existing covered cycle store for 40 No. cycle spaces located adjacent to the south entrance of the main facility building, and alignment of existing adjacent existing parking spaces to provide for 4 no Accessible car spaces. <p>Potential for In-combination effects</p>			

No potential for in-combination effects. The AA Screening Report undertaken for this project concluded there would be no potential for significant impacts to any European sites. As such, and accounting for the lack of potential impacts from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development.

F18A/0198	Fingal County Council	Granted Permission	295m SW
<p>Development Description</p> <p>Development at an existing pharmaceutical manufacturing facility (approximately 13.4 hectares). The development consists of the construction of a biopharmaceutical manufacturing campus with a total additional floor area of 12,046 square metres and specifically provides for:- (a) the conversion of an existing warehouse building to a biopharmaceutical manufacturing processes building which will require internal alterations, extension and modifications to the existing elevations; (b) the conversion of an existing manufacturing building to a central utilities and laboratory building requiring internal alterations, extension and modifications to the elevations including the addition of 3 no. flue stacks (to a maximum height of 18.68 metres); (c) construction of a two-storey quality control laboratory and single-storey with mezzanine warehouse building; (d) extension of the existing central spine corridor to provide connectivity to the new laboratory and warehouse buildings, including provision of new staff entrance; (e) demolition of existing utilities plant and buildings comprising 2 no. boiler rooms, compressor room, electrical room, generator compound, water tank and pump house, and 2 no. store buildings; (f) provision of new logistics yard and new ancillary external utilities yard comprising 2 no. electrical switch room buildings, water pump and treatment building, bunded water tank, bunded gas and diesel storage tanks, 3 no. emergency generators and waste water management facility; (g) installation of mechanical plant to the roof of the existing administration, laboratory and canteen building (h) all ancillary site works including diversion and partially reopening of the existing culverted stream within the site; underground services; surface water attenuation tank; modifications to the internal road network, modifications to existing car parking including removal of 212 spaces; 2 no. new bicycle shelters; lighting; CCTV; soft and hard landscaping.</p> <p>Potential for In-combination effects</p> <p>No potential for in-combination effects. The NIS for this project included a suite of mitigation measures to ensure no negative affects to the receiving surface water environment, and as such was not found to have potential for significant impacts to any European sites. As such, and accounting for the lack of potential impacts from the Proposed Development, it is determined there is no potential for in-combination effects between the Proposed Development and this development.</p>			
F18A/0350	Fingal County Council	Granted Permission	360m SE
<p>Development Description</p> <p>Permission for the construction of 16 no. houses comprising of 2 no. 4 bedroomed 2 storey detached dwellings and 14 no. 4 bedroomed 2 storey semi-detached dwellings with total floor area of circa 2384m², in lieu of previously approved and expired planning permission Reg. Ref.: F02A/1561 (parent permission) and Reg. Ref.: F06A/1880 and all associated site development works.</p> <p>Potential for In-combination effects</p> <p>No potential for in-combination effects. The AA Screening Report undertaken for this project concluded there would be no potential for significant impacts to any European sites. As such, and accounting for the lack of potential impacts from the Proposed Development, it is</p>			

determined there is no potential for in-combination effects between the Proposed Development and this development.

4.3.1.2 Relevant Policies and Plans

The local policies and plans detailed in section 2.2 above were reviewed and considered for possible in-combination effects with the Proposed Development. Each of these plans has undergone AA, and where potential for likely significant effects has been identified (e.g., in the case of the Fingal Development Plan), an NIS has been prepared which identifies appropriate mitigation. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development. The Fingal DP 2023-2029 has directly addressed the protection of European sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

TABLE 4. SUMMARY OF IMPACT ASSESSMENT ON EUROPEAN SITES AS A RESULT OF THE PROPOSED DEVELOPMENT.

Site	Habitat Loss / Alteration	Habitat or Species Fragmentation	Disturbance and/or Displacement of Species	Changes in Population Density	Changes in Water Quality and/or Resource	In-combination effects	Stage 2 AA Required
SAC							
Malahide Estuary SAC (000205)	No	No	No	None	None	None	NO
SPA							
Malahide Estuary SPA (004025)	No	No	No	None	None	None	NO
North-West Irish Sea SPA (004236)	No	No	No	None	None	None	NO

5 APPROPRIATE ASSESSMENT SCREENING CONCLUSION

The Proposed Development at Mountgorry, Swords, Co. Dublin has been assessed taking into account:

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

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:

- Malahide Estuary SAC (000205).
- Malahide Estuary SPA (004025).
- North-West Irish Sea SPA (004236).

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above-listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of an NIS is not required.

6 REFERENCES

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