



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

**North City Operations Depot,
St. Margaret's Road,
Ballymun, Dublin 11**

Appropriate Assessment Screening Report

November 2017



REPORT

PROJECT:

**North City Operations Depot,
St. Margaret's Road,
Ballymun, Dublin 11**

CLIENT:

Dublin City Council

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Project: North City Operations Depot, St. Margaret’s Road, Ballymun, Dublin 11

Title: Appropriate Assessment Screening Report

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TOBIN Consulting Engineers

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1 INTRODUCTION

This report forms an Appropriate Assessment Screening for the proposed Dublin City Council North City Operations Depot (NCOD), located at St. Margaret's Road, Ballymun, Dublin 11. The purpose of this Screening Report is to inform the Appropriate Assessment (AA) process which is carried out by the appropriate planning authority. Appropriate Assessment is an assessment of whether a plan or project, alone and in combination with other plans or projects, could have a significant effect on a European Site (otherwise known as Natura 2000 sites; EC Habitats Directive 92/43/EEC), in view of the site's conservation objectives.

2 THE APPROPRIATE ASSESSMENT PROCESS

2.1 INTRODUCTION TO APPROPRIATE ASSESSMENT (AA)

European and national legislation places a collective obligation on Ireland and its citizens to maintain habitats and species in the Natura 2000 network at favourable conservation condition. The Government and its agencies are responsible for the implementation and enforcement of regulations (in particular Part XAB of the Planning and Development (Amendment) Act 2010 and the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477) (often referred to as the Habitats Regulations) to ensure the ecological integrity of these sites.

Appropriate Assessment is an assessment of whether a plan or project, alone and in combination with other plans or projects, could have significant effects on a European Site in view of the site's conservation objectives. An Environmental Report has also been submitted for this development and this Screening Report forms an Appendix to provide detailed consideration of European Sites and their conservation objectives, which are the primary consideration for AA.

Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora - 'The Habitats Directive', has been transposed into Irish law by The European Community (Natural Habitats) Regulations 2011 (S.I. No. 477). The Birds Directive, Directive 2009/147/EC of the European Parliament and of the Council, seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs) whereas the Habitats Directive does the same for habitats and other species groups with Special Areas of Conservation (SACs). The requirement of AA is outlined in Article 6(3) and 6(4) of the *EU Habitats Directive*. Article 6(3) of the Habitats Directive requires that:

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

Furthermore, Article 6(4) of the Habitats Directive requires that:

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

Appropriate Assessment should be based on best scientific knowledge and Planning Authorities should ensure that scientific data (often including but not limited to ecological, hydrological and hydrogeological expertise) are utilised. This report details an Appropriate Assessment screening to inform the AA process which is finalised by the statutory authority. This Screening Report was informed by desk studies undertaken by a professional Ecologist from TOBIN Consulting Engineers.

2.2 APPROPRIATE ASSESSMENT METHODOLOGY

There are four main stages in the AA process; the requirements for each depending on likely impacts to European Sites (cSAC/ SPA).

Stage One: Screening – This process identifies the likely significant impacts upon a European Site from a proposed project or plan. Its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project which is not directly connected with or necessary to the management of the site as a European Site, individually or in combination with other plans or projects is likely to have a significant effect upon the European Site. A project may be “screened-in” if there is a possibility or uncertainty of significant adverse effects upon the European Site, requiring a Stage Two AA. If there is no evidence to suggest significant effects due to the proposed plan or development the project is “screened-out” and Appropriate Assessment is not required.

Stage Two: Appropriate Assessment – Consideration is given if the impact of the project or plan would adversely affect the integrity of surrounding European Sites, either alone or in combination with other projects or plans, with respect to the site’s structure and function and its conservation objectives. Additionally, where adverse impacts have been identified, an assessment

of the potential mitigation to reduce/minimise/avoid such impacts is required. This stage is the responsibility of the planning authority which is informed by a Natura Impact Statement. This stage is required where uncertainty of effect arises or a potential effect has been defined which requires further procedures/ mitigation to remove uncertainty of a defined impact.

Stage Three: Assessment of Alternative Solutions – Where adverse effects on a European Site are identified at the end of Stage Two despite the study of mitigation, this third stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European Site.

Stage Four: Assessment Where Adverse Impacts Remain - The fourth and final stage provides applies where the project can only proceed for Imperative Reasons of Overriding Public Interest (IROPI), despite the plan or project resulting in adverse effects on European Site(s). This stage provides for an assessment of compensation measures to maintain or enhance the overall coherence of the Natura 2000 network.

2.3 GUIDANCE

This report has been carried out using the following guidance:

- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10¹.
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010)².
- Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg (EC 2000)³.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg (EC 2002)⁴.
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest,

¹ NPWS (2010). Legislation Unit, NPWS Department of Environment, Heritage and Local Government, 7 Ely Place Dublin 2.

<https://www.npws.ie/sites/default/files/general/Circular%20NPW1-10%20&%20PSSP2-10%20Final.pdf>

² National Parks and Wildlife Services (2010):

http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf

³ European Commission (2000)

http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf

⁴ European Commission (2002)

http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

compensatory measures, overall coherence, opinion of the commission. Office for Official Publications of the European Communities, Luxembourg (EC 2007)⁵.

- Notes on the preparation and content of an NIS⁶.

3 SCREENING ASSESSMENT

3.1 INTRODUCTION

This stage of the process identifies any likely significant effects upon European Sites from a project or plan, either alone or in combination with other projects or plans. The screening phase was progressed in the following stages.

A series of questions are asked during the Screening Stage of the AA process in order to determine:

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

This report comprises a Screening Assessment of the proposed development in which potential impacts to European Sites are considered. Best practice construction methods described below will be required and are evaluated as an integral part of the proposed development.

3.2 NORTH CITY OPERATIONS DEPOT, BALLYMUN, DUBLIN 11

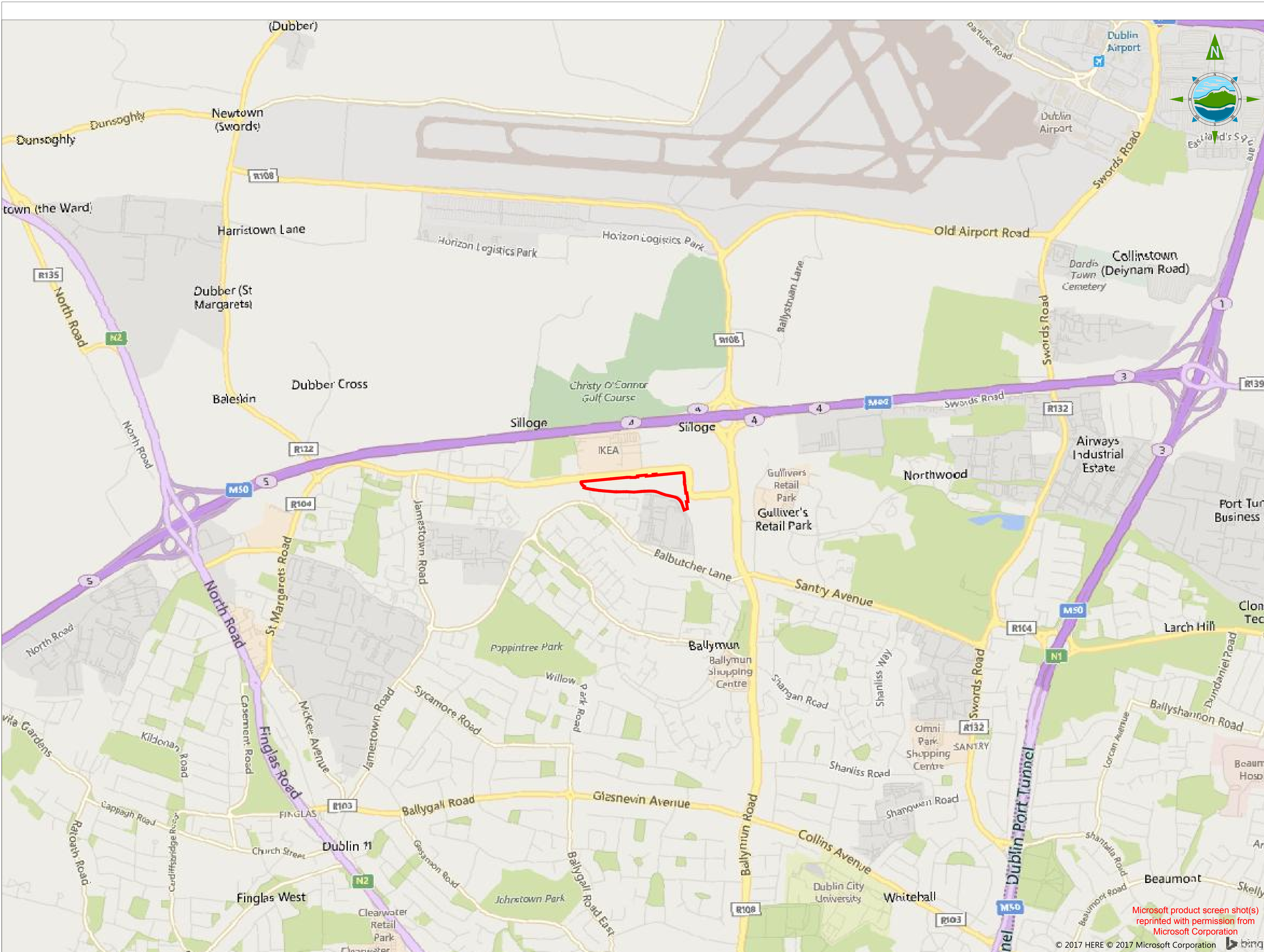
3.2.1 Site Location

The location of the proposed new Depot and Civic Amenity Site is along St. Margaret's Road, Ballymun, Dublin 11 with an area of 4.76 Hectares. The site is bounded to the south by a mix of Residential dwellings, St. Margaret's Halting site and Commercial/Industrial premises (Ballymun Industrial Estate) whilst to the north is located a large, retail warehouse for bulky goods (IKEA). There are no watercourses located within or adjacent to the site. The closest watercourse is a branch of the Santry River which is approximately 240m to the northeast of the site.

⁵ European Commission (2007)

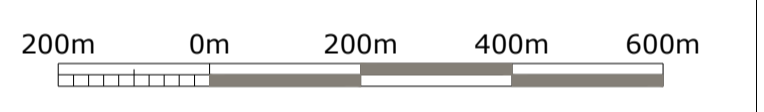
http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf

⁶ DoAHRGA (2017), Letter correspondence dated 22/02/17.



GENERAL LEGEND
 APPLICATION BOUNDARY

- NOTES:**
1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
 2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE.
 3. ENGINEER/EMPLOYERS REPRESENTATIVE, AS APPROPRIATE, TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.
 4. THE CONTRACTOR SHALL UNDERTAKE A THOROUGH CHECK FOR THE ACTUAL LOCATION OF ALL SERVICES/UTILITIES, ABOVE AND BELOW GROUND, BEFORE ANY WORK COMMENCES.
 5. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD.



Rev	Date	Description	By	Chkd.
A	NOV-17	REPORT ISSUE	PK	ST

Client:
DUBLIN CITY COUNCIL

Project:
**NORTH CITY OPERATIONS DEPOT
 BALLYMUN
 FOR DUBLIN CITY COUNCIL**

Title:
**REGIONAL
 SITE LOCATION MAP**

Scale @ A1: 1:2000

Prepared by: PK
 Checked by: AM
 OCT-17

Project Director: Michael McDonnell

Suitability Status: S3

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BALLYMUN SITE
 (Scale 1:1000)

3.2.2 Description of Project

The proposed new North City Operations Depot (NCOD), situated at St. Margaret's Road, Ballymun, brings together under a single corporate facility the following existing Operational Departments of Dublin City Council (DCC):

- Housing Maintenance;
- Roads Maintenance;
- Surface Water and Drainage (excluding foul drainage/Irish Water activities);
- Public Lighting and Electrical;
- Signage;
- Traffic Management; and
- Waste Management.

The Depot will provide a range of buildings and facilities to service all of the Departments including:

- Administration offices and Welfare facilities (open plan offices with a small number of cellular offices; changing, locker and shower facilities; meeting and briefing rooms; welfare room; storage; canteen facilities; plant areas);
- Covered parking facilities (multi-storey type for fleet and private staff vehicles as well as bicycle parking);
- Workshops (welding/metalwork; painting; carpentry; electrical; vehicle repair; signage);
- Stores Warehouse;
- Salt Barn;
- Security Kiosks;
- External material and equipment storage bays;
- External fleet vehicle parking areas;
- Vehicle wash bays;
- Waste compaction and collection areas;
- Waste receptacle storage area (for large items);
- Grit box storage area; and
- Antique granite storage bay.

There is a 300mm diameter surface water (SW) pipe running along St Margaret's Road. This 300mm pipe then appears to connect to an attenuation system for the local area prior to outfalling into the existing stream. This local stream presumably drained the area historically and every effort will be made in our design to ensure that this stream is not overloaded or contaminated by this development.

To this end a new on site surface water drainage system will be designed in accordance with the Greater Dublin Strategic Drainage Strategy (GDSDS). We will ensure surface water discharge from the site is limited to the calculated pre-development “Greenfield Runoff Rate” of 5.44l/s/ha through a combination of attenuation storage tanks, permeable paving and a green roof system. All surface water from the attenuation system will connect to the existing surface water drain via petrol interceptors and hydrobrakes.

It is proposed to provide attenuation storage within the site for extreme rainfall events of up to the 100 year storm. This will be beneficial to the site and receiving drainage networks as the outflow will be restricted. The most up-to-date rainfall intensities for the site area have been derived from Met Éireann and 20% climate change has been implemented in the attenuation capacity design.

For this project rain water harvesting will be utilised to feed most of the vehicle washing facilities throughout the site particularly the more industrial vehicles.

The water used to wash the vehicles is recycled similar to car washes in petrol stations and topped up from the rainwater harvesting tanks in most of the areas. This system will be further developed at planning and detailed design stage. A limited number of the vehicle washing areas will not use the rainwater harvesting but will be topped up by mains water and recycled as per a typical petrol station car wash.

Fingal County Council records indicate the presence of an existing 750mm diameter foul sewer pipe running along the St Margaret’s Road. It is proposed that the foul drainage from the proposed site will discharge to this existing 750mm diameter sewer.

Boreholes were used on the site to test the depth of the Groundwater. These recorded the Groundwater at a depth of 2.2m below the existing ground level. There are no problems envisaged relating to ground water ingress during foundation works. Due to the nature of the impermeable stiff clay the percolation is poor on this site.

A precautionary approach was taken throughout the project with the aim of avoiding, where possible, potential impacts on the ecological constraints identified. The main ecological constraints (including European Sites in the surrounding areas) were identified at the earliest stage in the project.

3.2.3 General Good Practice for Pollution and Invasive Species Control

Proper site management during construction must be carried out to ensure that all necessary measures are taken to prevent pollution, and the spreading of invasive species. The following standard practice pollution control measures will be incorporated into a Construction Management Plan (CMP) for the project once developed, which the contractor will be obliged to follow to reduce any risk of a pollution incident:

- Method Statements shall be submitted in full to the Employer's Representative for review and approval two weeks prior to the commencement of works on site.
- The Contractor will inspect all hydraulic hoses and fittings prior to mobilising equipment and machinery to site and carry out maintenance checks thereafter once onsite.
- The Contractor shall have a dedicated area for refuelling of equipment, ideally located at the temporary construction compound. Fuels and oils shall be stored in a bunded cabinet and a spill kit containing oil absorbent materials made available in the event of an accidental spillage. All chemicals will also be stored on spill pallets or similar.
- All HGV vehicles exiting the site are required to divert through a wheelwash located adjacent to the administration area. This infrastructure ensures that vehicles do not cause soiling of roads.
- A dust suppressor (e.g. water sprinkler/bowser) may be used in dry conditions if there are excessive amounts of dust being generated.
- The Contractor will ensure that any excavated material, not required for reinstatement following construction, is reused or disposed of at a waste permitted facility. Its disposal should not lead to the loss or damage of any natural or semi-natural habitats elsewhere. This material should not be placed close to any local watercourse or drainage ditch feeding into watercourses as it may result in an increase the release of silt downstream.
- The Contractor will ensure that invasive material such as Japanese knotweed, *Fallopia japonica*, which was found on site will be treated under Best Practice Management Guidelines⁷, and ensure that all staff working in the area are aware of it.
- On completion of the works, all plant, tools, offices, storage containers, surplus materials, waste and temporary welfare facilities will be removed from the site by the Contractor.

3.2.3.1 Bio-Security

The Contractor will ensure that invasive material such as Japanese knotweed (which was recorded during a site walkover within and bordering the proposed development site) will be treated under Best Practice Management Guidelines⁸, and ensure that all staff working in the area are aware of it. An invasive species management plan must be prepared as soon as possible to

⁸ www.nonnativespecies.org/downloadDocument.cfm?id=1013

⁸ www.nonnativespecies.org/downloadDocument.cfm?id=1013

avoid unintentional spread of this species, at least prior to the commencement of construction work onsite.

Measures to avoid the spread of Japanese knotweed include all Contractors ensuring that all equipment and machinery is cleaned (steam washed) and disinfected prior to arrival on site, and again once works are completed. This is particularly important to avoid the spread of invasive species within the site and by extension to road verges and watercourses outside of the site.

3.3 DESCRIPTION OF THE EXISTING ENVIRONMENT

3.3.1 Information Sources

The ecological study to inform the Appropriate Assessment Screening completed for the proposed Ballymun NCOD development comprised the following elements:

- Identification of European Sites within the Zone of Influence (Zol) of the proposed development area through the identification of potential pathways/ links from the proposed development area and European Sites and/ or supporting habitats;
- Review of the National Parks and Wildlife Service (NPWS) site synopses (Natura 2000 data form) and conservation objectives for European Sites⁹ with identification of potential pathways from the proposed development; and
- Review of available literature and web data. This included a detailed review of the NPWS website including mapping and available reports¹⁰ for relevant sites and in particular Qualifying Interests described and their conservation objectives.
- An ecological/biodiversity site survey was carried out by an experienced TOBIN ecologist on the 9th of June 2017.

An outline of the key datasets and information sources reviewed as part of the desktop study are provided below:

- National Parks and Wildlife Service database of areas designated (and proposed) for nature conservation;
- National Biodiversity Data Centre database¹¹ (NBDC);
- Water Framework Directive (WFD) website¹²;
- Environmental Protection Agency (EPA) Envision database¹³; and
- OSI and Google aerial photography and mapping were used to identify non-designated semi-natural habitats of local ecological importance.

3.3.2 Existing Environment

The site is located on the edge of Dublin City, on land bordering the M50 motorway. The closest protected area is the South Dublin Bay and River Tolka Estuary SPA, which is located 5.5km south-south-east. This urban environment has undergone construction related disturbance in recent years, evident by aerial photography. In addition it was noted during the site visit that the site consisted of large patches of spoil and bare ground (Fossitt classification ED2), with some areas recolonising. The site is dominated by Dry meadows and grassy verges (Fossitt classification GS2). The track along the southeast of the site, outside the Ballymun Industrial

⁹ National Parks and Wildlife Service: <http://www.npws.ie/protectedsites/> (accessed July, 2017)

¹⁰ National Parks and Wildlife Service: <http://www.npws.ie/mapsanddata/> (accessed July, 2017)

¹¹ National Biodiversity Data Centre: <http://maps.biodiversityireland.ie/#/Map> (accessed July, 2017)

¹² EPA & RBD Coordinating Bodies: <http://www.wfdireland.ie/wfd-more.html> (accessed July, 2017)

¹³ Envision database: <http://gis.epa.ie/Envision> (accessed July, 2017)

Estate is delineated with a mix of mature and immature treelines and earthbanks to the north and south. The northern part of this track is lined with relatively young trees on an earth bank. This treeline is c.2.5m to 5m in height and consists of Ash (*Fraxinus excelsior*), Elder (*Sambucus nigra*), Hawthorn (*Crataegus monogyna*), Willow (*Salix sp.*), Buddleja (*Buddleja davidii*), and Sycamore (*Acer pseudoplatanus*). The flora on the earth bank consisted of Wild mustard (*Sinapsis arvensis*), Hogweed (*Heracleum sphondylium*), Ragwort (*Jacobaea vulgaris*), Thistle (*Cirsium sp.*), Broad dock (*Rumex obtusifolius*), Nettle (*Urtica dioecia*), Buttercup (*Ranunculus sp.*), Bindweed (*Convolvulus*), Plantain (*Plantago sp.*), Willowherb (*Epilobium sp.*), Bramble (*Rubus fruticosus*) and Fuchsia (*Fuchsia magellanica*). The species composition to the south of the track was very similar; however it also included dog rose (*Rosa canina*). The treeline was much more mature with several sycamore trees and two ash being approximately 12-15m high. Some mature elder was also present. An ESB building and hardstanding are located at the northern boundary of the site.

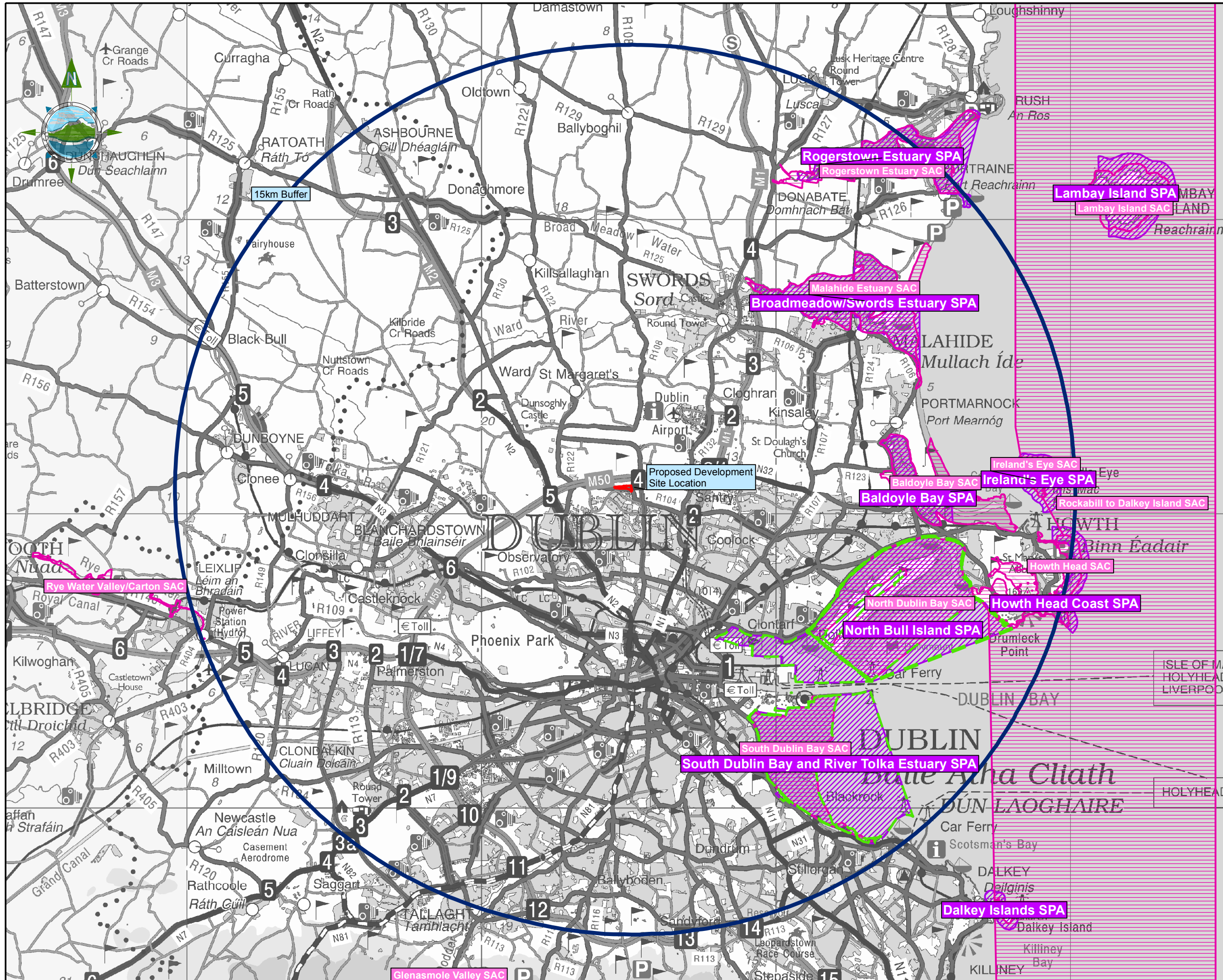
The habitats present on site were dry meadows and grassy verges (GS2), spoil and bare ground (ED2), recolonising bare ground (ED3), earth banks (BL2), treelines (WL2), buildings and artificial surfaces (BL3). Japanese knotweed was identified around the ESB building in the middle of the development. An invasive species management plan will be prepared before disturbance of this species or surrounding terrain.

There are no watercourses within or adjacent to the proposed NCOD development site. The closest being a branch of the Santry River, located approximately 240m away in a north-easterly direction. The site lies within the Mayne subcatchment (SC-010) with surface water likely to enter the Santry River. The River Santry exits into Dublin Bay at Bull Island. The site is contained within the Dublin Ground Water Body which is poorly productive bedrock in terms of flow regime. Groundwater vulnerability at the site and surrounding area is classed as “low”.

3.4 IDENTIFICATION OF RELEVANT NATURA 2000 SITES

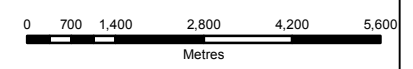
A standard source-receptor-pathway conceptual model was used to identify a preliminary list of ‘relevant’ European Sites (i.e. those which could be potentially affected). This conceptual model is a standard tool in environmental assessment. In order for an effect to occur, all three elements of this mechanism must be in place. The absence or removal of one of the elements of the mechanism means there is no likelihood for the effect to occur. In the context of the proposed works, the model comprises:

- Source (s) – e.g. sediment run-off from proposed works
- Pathway (s) – e.g. drains and streams connecting to a European Site
- Receptor (s) – Qualifying habitats and species of European Sites



Legend

- Proposed Development Site
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- 15km Buffer of Proposed Development Site
- European Sites With Potential Linkage



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

Issue	Date	Description	By	Chkd.
A	Nov-17	Final	A.B.	S.T.

Client:

Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath

Project:
North City Operations Depot (NCOD)

Title:
European Designated Sites

Scale @ A3: 1:120,000

Prepared by: A.Booth Checked: S.Tinnelly Date: November 2017

Project Director: D.Grehan

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Drawing No10243- Figure 1.3 Issue: **A**

There are sixteen European Sites located within 15km of the proposed development site (refer to Designated Sites Map, Figure 3); Rye Water Valley/ Carton (SAC) [001398], South Dublin Bay (SAC) [000210], North Dublin Bay (SAC) [000206], Baldoyle Bay (SAC) [000199], Howth Head (SAC) [000202], Rockabill to Dalkey Island (SAC) [003000], Ireland's Eye (SAC) [002193], Malahide Estuary (SAC) [000205], Rogerstown Estuary (SAC) [000208], Rogerstown Estuary (SPA) [004015], Broadmeadow/Swords Estuary (SPA) [004025], Baldoyle Bay (SPA) [004016], Ireland's Eye (SPA) [004117], North Bull Island (SPA) [004006], South Dublin Bay and River Tolka Estuary (SPA) [004024], and Howth Head Coast (SPA) [004113].

North Dublin Bay SAC is located c.7.5km south east (downstream) of the proposed development. It is designated for the protection of mudflats and sandflats not covered by seawater at low tide [1140], annual vegetation of drift lines [1210], *Salicornia* and other annuals colonising mud and sand [1310], Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330], Mediterranean salt meadows (*Juncetalia maritima*) [1410], embryonic shifting dunes [2110], shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120], Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130], humid dune slacks [2190], and *Petalophyllum ralfsii* (Petalwort) [1395]. There is potential for hydrological links between the proposed development site and this European site through a branch of the Santry River which is approximately 240m to the northeast of the site. The River Santry exits into Dublin Bay at Bull Island. Pollution and siltation could potentially affect this designated site.

As mentioned in the project description, there is a 300mm diameter surface water pipe running along St Margaret's Road which outfalls into this existing stream after an attenuation system. It is proposed to connect to this drain while taking every consideration not to overload its capacity or contaminate the river. Mitigation measures will be implemented to ensure this. These are outlined in the project description above.

Ground water strikes were not encountered above 2.2m below existing ground level; hence no problems are envisaged related to groundwater ingress during foundation works. While taking this precautionary approach, there is no potential for significant effects.

North Bull Island SPA is located c.7.5km to the south east (downstream) of the proposed development. It is designated for the protection of bird species such as light-bellied brent goose (*Branta bernicla hrota*) [A046], shelduck (*Tadorna tadorna*) [A048], teal (*Anas crecca*) [A052], pintail (*Anas acuta*) [A054], shoveler (*Anas clypeata*) [A056], oystercatcher (*Haematopus ostralegus*) [A130], golden plover (*Pluvialis apricaria*) [A140], grey plover (*Pluvialis squatarola*) [A141], knot (*Calidris canutus*) [A143], dunlin (*Calidris alpina*) [A149], black-tailed godwit (*Limosa limosa*) [A156], bar-tailed godwit (*Limosa lapponica*) [A157], curlew (*Numenius arquata*) [A160], redshank (*Tringa totanus*) [A162], turnstone (*Arenaria interpres*) [A169], black-headed gull

(*Chroicocephalus ridibundus*) [A179], and wetland and waterbirds [A999]. There is potential for hydrological links between the proposed development site and this European site through the branch of the Santry. The River Santry exits into Dublin Bay at Bull Island. Pollution and sedimentation may affect the feeding potential for the designated bird species, however by implementing the same procedure as above and by considering the distance from the site, it is anticipated that there is no potential for significant effects.

The South Dublin Bay SAC is located 8.5km SSE of the proposed development. It is designated for the protection of mudflats and sandflats not covered by seawater at low tide [1140], annual vegetation of drift lines [1210], *Salicornia* and other annuals colonising mud and sand [1310], and embryonic shifting dunes [2110]. There is potential for hydrological links between the proposed development site and this European site through the branch of the Santry River which was mentioned above. Pollution and sedimentation may affect the quality of this habitat. By implementing the same mitigation procedures as above and by considering the distance from the site, it is anticipated that there is no potential for significant effects.

South Dublin Bay and River Tolka Estuary SPA is located 5.5km south-south east of the proposed development. It is designated for the protection of bird species such as light-bellied brent goose (*Branta bernicla hrota*) [A046], oystercatcher (*Haematopus ostralegus*) [A130], ringed plover (*Charadrius hiaticula*) [A137], grey plover (*Pluvialis squatarola*) [A141], knot (*Calidris canutus*) [A143], sanderling (*Calidris alpina*) [A144], dunlin (*Calidris alpina*) [A149], bar-tailed godwit (*Limosa lapponica*) [A157], redshank (*Tringa totanus*) [A162], black-headed gull (*Chroicocephalus ridibundus*) [A179], roseate tern (*Sterna dougallii*) [A192], common tern (*Sterna hirundo*) [A193], arctic tern (*Sterna paradisaea*) [A194], and wetland and waterbirds [A999]. As discussed, there is potential for hydrological links between the proposed development site and this European site through the branch of the Santry River which is outlined above. Pollution and sedimentation may affect the feeding potential for the designated bird species, however by implementing the same procedure as above and by considering the distance from the site, it is anticipated that there is no potential for significant effects.

Potential links exist between the proposed development site and the above four European sites. These links may be considered weak due to the distance from the proposed development site located upstream, and the implementation of pollution control and mitigation measures.

3.5 POTENTIAL ADVERSE EFFECTS ON NATURA 2000 SITES

3.5.1 *Potential for direct impacts*

The proposed Ballymun North City Operations Depot development site is not located within or directly adjacent to any designated European Site. There will be no direct loss, fragmentation or disturbance to any Annex I habitat or Annex II species (or their supporting habitat), which are the Qualifying Interests of relevant European Sites, as a result of the proposed development.

3.5.2 *Potential for indirect impacts*

The site is located within an area of unused/ recolonising land within the townlands of Balcurris/Ballymun, Dublin 11. There are no watercourses within the proposed Ballymun NCOD development site. There is a branch of the Santry River which is approximately 240m to the northeast of the site. The River Santry exits into Dublin Bay at Bull Island. While following the mitigation measures on surface water run-off and material storage as outlined above, it is anticipated that there is no potential for significant effects.

3.5.3 *Potential for in-combination or cumulative effects*

The proposed development is sited within an area of dry meadows and grassy verges, within an urban environment. A planning search was conducted for proposed and granted developments within the Zone of Influence^{14,15}. No planning permissions of note were found within these searches that will contribute to adverse impacts on the qualifying interests or the conservation objectives of any designated Natura 2000 site.

4 SCREENING CONCLUSION

The proposed North City Operations Depot development at Balcurris/Ballymun, Dublin 11 is not located within or directly adjacent to any European site. The Appropriate Assessment screening process considered potential impacts which may arise during the construction and operational phases of the proposed development. Four European Sites are considered to have potential links with the proposed development site - North Dublin Bay SAC; North Bull Island SPA; South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA.

Through an assessment of the pathways for effects and an evaluation of the project, taking account of the processes involved and the distance of separation between Natura 2000 designations in the wider study area, it has been evaluated that there are no likely significant adverse effects on the qualifying interests or the conservation objectives of any designated European Site.

¹⁴ <http://www.eplanning.ie/dublins.htm>

¹⁵ http://cspwprdfc.cloudapp.net/lists/pa/index.htm#_Leinster

It is concluded that there are no likely potential impacts, whether direct, indirect or cumulative/in-combination, which could give rise to adverse effects on the qualifying interests or the conservation objectives of any designated Natura 2000 site. It can be concluded that it is unlikely that the proposed development will result in significant effects to any European Site, in view of their conservation objectives of the habitats or species for which it was designated, either alone or in combination with other plans or projects. Consequently this proposed development does not require an NIS or need to advance in the Appropriate Assessment process.



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