Screening Report for Appropriate Assessment of proposed innovation centre at Naas, Co. Kildare

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for
Kildare County Council

www.openfield.ie

February 2018

Introduction

Biodiversity is a contraction of the words 'biological diversity' and describes the enormous variability in species, habitats and genes that exist on Earth. It provides food, building materials, fuel and clothing while maintaining clean air, water, soil fertility and the pollination of crops. A study by the Department of Environment, Heritage and Local Government placed the economic value of biodiversity to Ireland at €2.6 billion annually (Bullock et al., 2008) for these 'ecosystem services'.

All life depends on biodiversity and its current global decline is a major challenge facing humanity. In 1992, at the Rio Earth Summit, this challenge was recognised by the United Nations through the Convention on Biological Diversity which has since been ratified by 193 countries, including Ireland. Its goal to significantly slow down the rate of biodiversity loss on Earth has been echoed by the European Union, which set a target date of 2010 for *halting* the decline. This target was not met but in 2010 in Nagoya, Japan, governments from around the world set about redoubling their efforts and issued a strategy for 2020 called 'Living in Harmony with Nature'. In 2011 the Irish Government incorporated the goals set out in this strategy, along with its commitments to the conservation of biodiversity under national and EU law, in the second national biodiversity action plan (Dept. of Arts, Heritage and the Gaeltacht, 2011). A third plan was published in 2017.

The main policy instruments for conserving biodiversity in Ireland have been the Birds Directive of 1979 and the Habitats Directive of 1992. Among other things, these require member states to designate areas of their territory that contain important bird populations in the case of the former; or a representative sample of important or endangered habitats and species in the case of the latter. These areas are known as Special Protection Areas (SPA) and Special Areas of Conservation (SAC) respectively. Collectively they form a network of sites across the European Union known as Natura 2000. A recent report into the economic benefits of the Natura 2000 network concluded that "there is a new evidence base that conserving and investing in our biodiversity makes sense for climate challenges, for saving money, for jobs, for food, water and physical security, for cultural identity, health, science and learning, and of course for biodiversity itself" (EC, 2013).

Unlike traditional nature reserves or national parks, Natura 2000 sites are not 'fenced-off' from human activity and are frequently in private ownership. It is the responsibility of the competent national authority to ensure that 'good conservation status' exists for their SPAs and SACs and specifically that Article 6(3) of the Directive is met. Article 6(3) requires that an 'appropriate assessment' (AA) be carried out for these sites where projects, plans or proposals are likely to have an effect. In some cases this is obvious from the start, for instance where a road is to pass through a designated site. However, where this is not the case, a preliminary screening must first be carried out to determine whether or not a full AA is required. This screening is carried out by the Local Authority and this report can aid in that decision.

The Purpose of this document

This document provides for the screening of a proposed innovation/business centre at a site in Naas town centre, Co. Kildare, and its potential effects in relation to Natura 2000 sites (SACs and SPAs). Under the Planning and Development Act 2000 (as amended) all developments must be screened for AA by the Local Authority. This report provides the necessary information to allow Kildare County Council to carry out this screening.

Methodology

The methodology for this screening statement is clearly set out in a document prepared for the Environment DG of the European Commission entitled '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' (Oxford Brookes University, 2001). Chapter 3, part 1, of this document deals specifically with screening while Annex 2 provides the template for the screening/finding of no significant effects report matrices to be used.

In accordance with this guidance, the following methodology has been used to produce this screening statement:

Step 1: Management of the Natura 2000 site
This determines whether the project is necessary for the conservation management of the site in question.

Step 2: Description of the Project
This step describes the aspects of the project that may have an impact on the Natura 2000 site.

Step 3: Characteristics of the Natura Site
This process identifies the conservation aspects of the site and determines whether negative impacts can be expected as a result of the plan. This is done through a literature survey and consultation with relevant stakeholders – particularly the National Parks and Wildlife Service (NPWS). All potential effects are identified including those that may act alone or in combination with other projects or plans.

Using the precautionary principle, and through consultation and a review of published data, it is normally possible to conclude at this point whether potential impacts are likely. Deficiencies in available data are also highlighted at this stage.

Step 4: Assessment of Significance
Assessing whether an effect is significant must be made in light of the conservation objectives for that SAC or SPA.
If this analysis shows that significant effects are likely then a full AA will be required.

The steps are compiled into a screening matrix, a template of which is provided in Appendix II of the EU methodology.

Reference is also made to recently published guidelines for Local Authorities from the Department of the Environment, Heritage and Local Government (DoEHLG, 2009).

A full list of literature sources that have been consulted for this study is given in the References section to this report while individual references are cited within the text where relevant.

Screening Template as per Annex 2 of EU methodology:

This plan is not necessary for the management of the site and so Step 1 as outlined above is not relevant.

Step 1: Brief description of the project

The site location is shown in figures 1 and 2.

Figure 1 – Site location (red circle) (from www.npws.ie). There are no Natura areas in this view.

It is planned to construct an innovation hub on the site in Naas to include parking and other associated infrastructure. It is described thus, as per the Part 8 application

The development will comprise of:
(a) Proposed new two storey Mid Eastern Region Innovation Think Space (MERITS) building with co-working incubation and accelerator space for

technology entrepreneurs and technology businesses on a site of approx. 0.6 Ha. to include the provision of entrance reception area with canopy and signage; café; community rooms; meeting rooms; managers office; conference area / function room, open plan office for hot desks and 10 no. business start-up office space; kitchenettes; associated service rooms; plantrooms; storage rooms; male, female and accessible toilets over two floors consisting of 1,210 sqm.

(b) A new vehicular ramp, pedestrian steps and ramp from the existing Aras Chill Dara car park, alteration and relocation of the existing 36 no carparking spaces providing a total of 91 carparking spaces on the site including 3 accessible carparking spaces 6 electric charging car parking spaces; 3 motor bike spaces and a sheltered bike parking area. The proposed development will provide an additional 55 no. carparking spaces for the proposed MERITS building.

(c) The proposals include all necessary services including on site water attenuation; utility and associated site works

The site was visited on December 11th 2017 and while this is outside the optimal season for general habitat survey it is essential for a study of this nature that linkages between the site and Natura areas be identified. In this regard a full assessment was possible. Habitats are described here in accordance with the standard Fossitt classification scheme (Fossitt, 2000).

The site is within former agricultural fields, but is no longer managed for this purpose. There is evidence of some soil disturbance, but vegetation covers most of the ground area. Because of a lack of grazing the lands can be described as **dry meadows – GS2**, and are composed of rough grasses such as Cock's-foot *Dactylis glomerata,* False Oat *Arrhenatherum elatius* and Creeping Bent *Agrostis stolonifera.* These are accompanied by Rosebay Willowherb *Chamerion angustifolium,* Thistles *Cirsium arvense,* Creeping Buttercup *Ranunculus repens,* Docks *Rumex sp.,* etc.

This is the only semi-natural habitat on the site. There are no water courses on the site or bodies of open water. There are no plant species which are listed as alien invasive under Schedule 3 of SI No. 477 of 2011.None of the habitats is an example of those listed on Annex I of the Habitats Directive.

A possible stand of the invasive Salmonberry (*Rubus spectabilis*) was identified approximately 80m north-west of the site boundary. It may be a stand of Raspberry *R. idaeus* but key distinguishing features are not present in December (Stace, 2010). It is well away from the likely construction zone but a cautionary approach should be taken to limit the movement of machinery etc. Salmonberry is listed on the aforementioned SI although specific guidelines on its treatment are not available.

Wastewater from the development will pass to the Osberstown wastewater treatment plant (also known as the Upper Liffey Valley Regional Sewerage

Scheme). This plant discharges treated wastewater to the River Liffey under licence from the Environmental Protection Agency (EPA).

Surface water from the site will be attenuated on site before diffusing to the existing Áras Chill Dara surface water system via fin drains with diffuser boxes bridging the stone layers from the existing permeable paved car park and the proposed permeable paved car park and swale. Within the site rainwater harvesting, permeable paving and swales are to be utilised to reduce run-off rates. This design is fully compatible with SUDS principles and the GDSDS.

The site is not located within or directly adjacent to any Natura 2000 area (SAC or SPA). This part of Naas is close to the town centre, and land use is predominantly of a built nature. Although on the edge of a larger area of open ground, there are buildings, roads or car parking areas to the north, east and south. Mapping from the OSI and EPA show no water courses running through the site. The land is close to the Yeomanstown Stream, which flows approximately 370m to the west, and is a tributary of the River Liffey. The River Liffey is subject to no Natura designations. At Dublin Bay, where it discharges to the Irish Sea, it is within a number of such areas however.

The construction phase will involve the clearance of top soil and sub-soil. Any inert construction and demolition waste will be removed by a licenced contractor and disposed of in accordance with the Waste Management Act.

A new surface water drainage system is to be installed that will be separate from the foul system.

Foul wastewater will be treated in the municipal treatment plant at Osberstown, which facilitates the towns of Naas, Newbridge, Kilcullen, Sallins and Kill.

Water will be supplied from a mains supply which originates from reservoirs at Ballymore Eustace, along the River Liffey. The reservoirs at Poulaphouca are designated as an SPA.

There are no point air emissions from the site while some dust and noise can be expected during the construction phase.

The operation phase will see the development occupied and this will bring with it human disturbance as well as noise and artificial light.

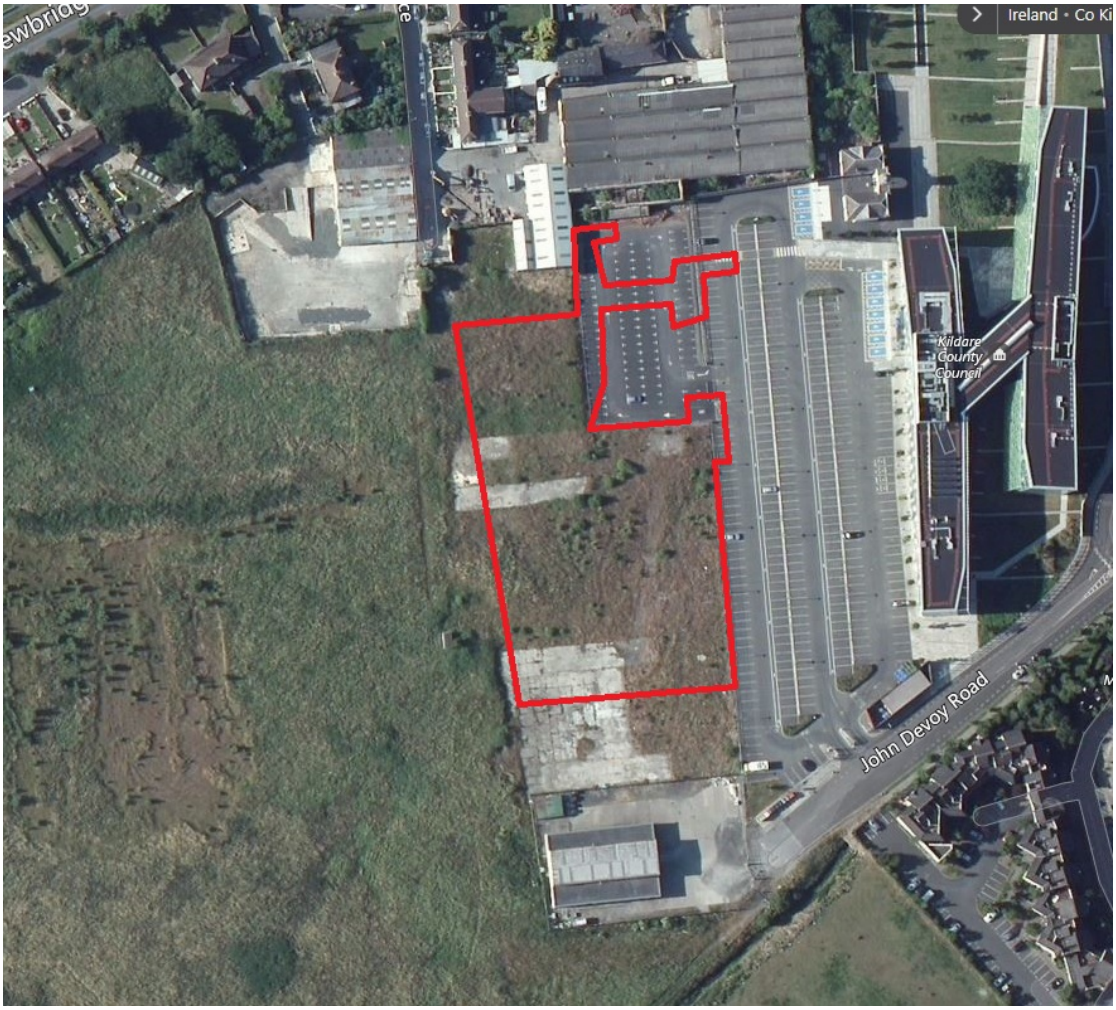

Figure 2 – Site boundary (in red line) on recent aerial photograph (from www.bing.com)

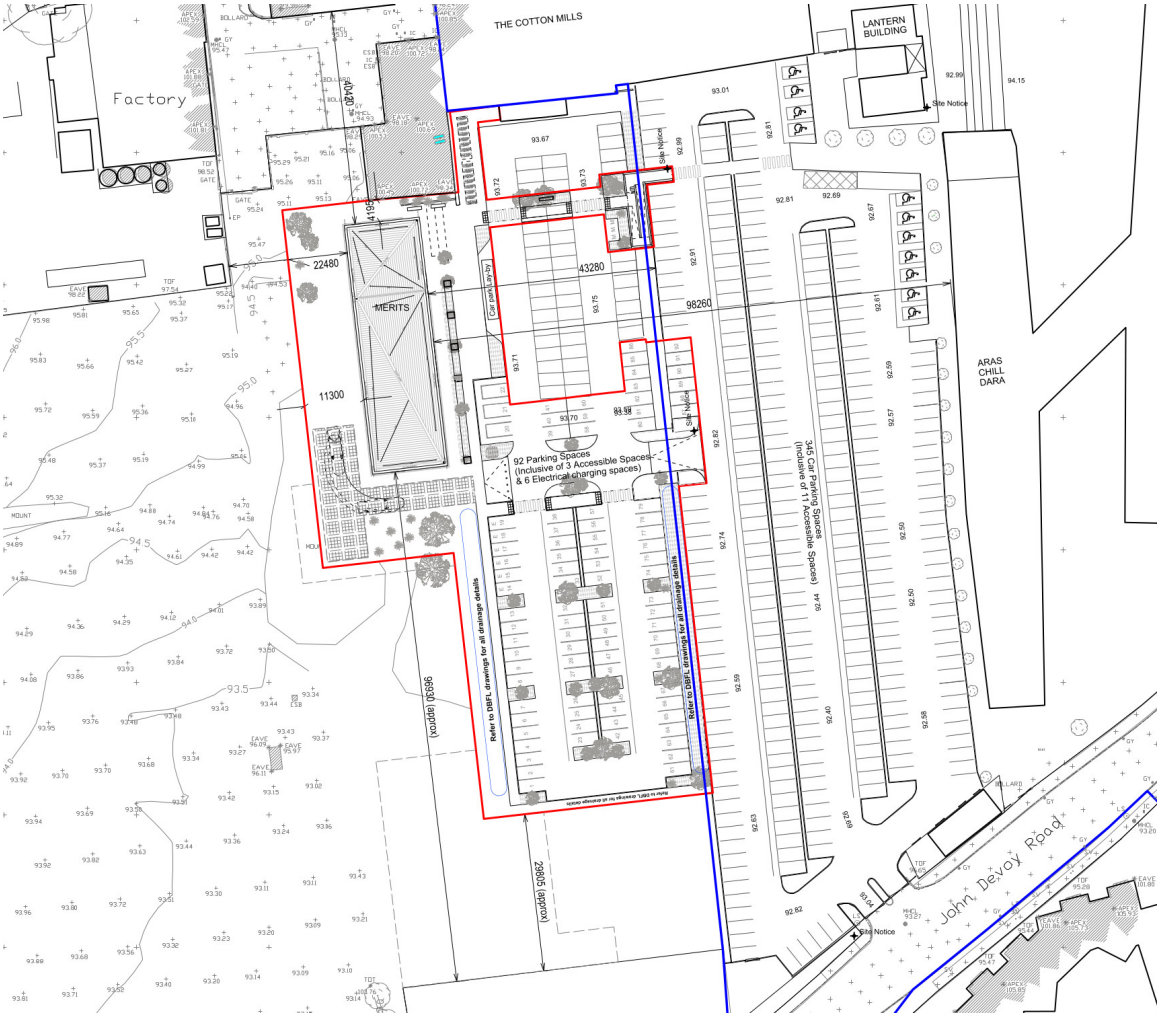

Figure 3 – proposed site layout

Step 3: Brief description of Natura 2000 sites

In assessing the zone of influence of this project upon Natura 2000 sites the following factors must be considered:

- Potential impacts arising from the project
- The location and nature of Natura 2000 sites
- Pathways between the development and the Natura 2000 network

It has already been stated that the site is not located within or directly adjacent to any Natura 2000 area. For projects of this nature an initial 2km radius is normally examined (IEA, 1995). This is an arbitrary distance however and impacts can occur at distances greater than this. There are no Natura areas within this radius. The **South Dublin Bay and River Tolka Estuary SPA (site code: 4024)**; the **South Dublin Bay SAC (0210)** and the **Poulaphouca Reservoir SPA (site code: 4063)**, from which drinking water supply for this development will originate, are all considered to fall within the zone of influence of this project. These are considered to be the only Natura 2000 areas within the zone of influence of the development as pathways do not exist to other areas.

Table 1 – Features of interest for the South Dublin Bay and River Tolka Estuary SPA (EU code in square parenthesis)

Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]
Oystercatcher (*Haematopus ostralegus*) [A130]
Ringed Plover (*Charadrius hiaticula*) [A137]
Grey Plover (*Pluvialis squatarola*) [A140]
Knot (*Calidris canutus*) [A143]
Sanderling (*Calidris alba*) [A144]
Dunlin (*Calidris alpina*) [A149]
Bar-tailed Godwit (*Limosa lapponica*) [A157]
Redshank (*Tringa totanus*) [A162]
Black-headed Gull (*Croicocephalus ridibundus*) [A179]
Roseate Tern (*Sterna dougallii*) [A192]
Common Tern (*Sterna hirundo*) [A193]
Arctic Tern (*Sterna paradisaea*) [A194]
Wetlands & Waterbirds [A999]

The **South Dublin Bay and Tolka Estuary SPA** (side code: 4024) is largely coincident with the South Dublin Bay SAC boundary with the exception of the Tolka Estuary. Wintering birds in particular are attracted to this area in great number as they shelter from harsh conditions further north and avail of the available food supply within sands and soft sediments. Table 1 lists the features of interest for the SPA.

- **Light-bellied Brent Goose.** There has been a 67% increase in the distribution of this goose which winters throughout the Irish coast. The light-bellied subspecies found in Ireland breeds predominantly in the Canadian Arctic.
- **Sanderling.** This small bird breeds in the high Arctic and winters in Ireland along sandy beaches and sandbars. Its wintering distribution has increased by 21% in the previous 30 years.
- **Dunlin.** Although widespread and stable in number during the winter season, the Irish breeding population has collapsed by nearly 70% in 40 years. Breeding is now confined to just seven sites in the north and west as habitat in former nesting areas has been degraded.
- **Knot.** These small wading birds do not breed in Ireland but gather in coastal wetlands in winter. Their numbers have increased dramatically since the mid-1990s although the reasons for this are unclear.
- **Black-headed Gull.** Widespread and abundant in winter these gulls are nevertheless considered to be in decline. The reasons behind this are unclear but may relate to the loss of safe nesting sites, drainage, food depletion and increase predation.
- **Ringed Plover.** This bird is a common sight around the Irish coast where it is resident. They breed on stony beaches but also, more recently, on cut-away bog in the midlands.
- **Oystercatcher.** Predominantly coastal in habit Oystercatchers are resident birds whose numbers continue to expand in Ireland.
- **Bar-tailed Godwit.** These wetland wading birds do not breed in Ireland but are found throughout the littoral zone during winter months. They prefer estuaries where there are areas of soft mud and sediments on which to feed.
- **Grey Plover.** These birds do not breed in Ireland but winter throughout coastal estuaries and wetlands. Its population and distribution is considered to be stable.
- **Roseate Tern.** This tern breeds at only a few stations along Ireland's east coast. Most of these are in decline although at Dublin their colony is increasing.
- **Common Tern.** This summer visitor nests along the coast and on islands in the largest lakes. Its breeding range has halved in Ireland since the 1968-1972 period.
- **Arctic Tern.** These long-distance travellers predominantly breed in coastal areas of Ireland. They have suffered from predation by invasive mink and are declining in much of their range.
- **Redshank.** Once common breeders throughout the peatlands and wet grasslands of the midlands Redshanks have undergone a 55% decline in

distribution in the past 40 years. Agricultural intensification, drainage of wetlands and predation are the chief drivers of this change.

Bird counts form BirdWatch Ireland are taken from Dublin Bay as a whole and are not specific to any particular portion of the Bay. Dublin Bay is recognised as an internationally important site for water birds as it supports over 20,000 individuals. Table 2 shows the most recent count data available (Crowe et al., 2012).

Table 2 – Annual count data for Dublin Bay from the Irish Wetland Birds Survey (IWeBS)

Year	2010/11	2011/12	2012/13	2013/14	2014/15	Mean
Count	27,931	30,725	30,021	35,878	33,486	31,608

There were also internationally important populations of particular birds recorded in Dublin Bay (i.e. over 1% of the world population): Light-bellied brent geese *Branta bernicula hrota*; Black-tailed godwit *Limosa limosa*; Knot *Calidris canutus* and Bar-tailed godwit *L. lapponica*.

The **South Dublin Bay SAC** (side code: 0210) is concentrated on the intertidal area of Sandymount Strand. It has one qualifying interest which is mudflats and sandflats not covered by seawater at low tide. Tidal mudflats (habitat code: 1140) is an intertidal habitat characterised by fine silt and sediment. Most of the area in Ireland is of favourable status however water quality and fishing activity, including aquaculture, are negatively affecting some areas. At a national scale it is assessed as of 'intermediate' status (NPWS, 2013).

At its nearest point the **Poulaphouca Reservoir SPA** (site code: 4063) is located approximately 9km from the site of the proposed development. Its 'features of interest' include the Greylag Goose *Anser anser* and the Lesser Black-backed Gull *Larus fuscus*.

Whether any of these SACs or SPAs is likely to be significantly affected must be measured against their 'conservation objectives'. Specific conservation objectives have been set for all of these areas with the exception of the Poulaphouca Reservoir. Generic conservation objectives have been published by the NPWS and are stated as:

To maintain or restore the favourable conservation condition of the Annexed species for which the SPA has been selected. (NPWS, 2011).

In a generic sense 'favourable conservation status' of a habitat is achieved when:

• its natural range, and area it covers within that range, are stable or increasing, and

• the specific structure and functions which are necessary for its long - term maintenance exist and are likely to continue to exist for the foreseeable future, and
• the conservation status of its typical species is favourable.

While the 'favourable conservation status' of a species is achieved when:
• population dynamics data on the species concerned indicate that it is maintaining itself on a long - term basis as a viable component of its natural habitats, and
• the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
• there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long - term basis.

Specific conservation objectives have been set for the South Dublin Bay SAC (NPWS, 2013). The objectives relate to habitat area, community extent, community structure and community distribution within the qualifying interest. There is no objective in relation to water quality.

For the South Dublin Bay & Tolka Estuary SPA the conservations objectives for each bird species relates to maintaining a population trend that is stable or increasing, and maintaining the current distribution in time and space (NPWS, 2015a & b).

For the Poulaphouca Reservoir SPA, generic conservation objectives have been published by the NPWS and are as previously stated above (NPWS, 2015c).

Data collected to carry out the assessment

The site visit has shown that habitats on the site are not associated with any of the habitats or species listed in table 2 or which are suitable for roosting wetland birds.

The EU's Water Framework Directive (WFD) stipulates that all water bodies were to have attained 'good ecological status' by 2015. This includes estuarine waters and Dublin Bay is located within the Eastern River Basin District. In 2009 a management plan was published to address pollution issues and includes a 'programme of measures' which must be completed. This plan was approved in 2010 (ERBD, 2010). The Tolka Estuary has most recently (2014) been assessed by the Environmental Protection Agency (EPA) as 'potentially eutrophic' – a term which implies moderate pollution either from point or diffuse sources (from www.epa.ie). It was assessed as 'moderate' in terms of its status under the Water Framework Directive for the 2010-12 reporting period. This classification indicates that water quality in the estuary is of an insufficient standard to meet the requirements of the WFD. Measures must therefore be taken in the coming years to address existing

problems and any new developments within the catchment must not contribute to the pollution loading. The status of the coastal water in Dublin Bay meanwhile is 'good'.

The Yeomanstown Stream is a part of the Liffey Water Management Unit and the majority of the Liffey river system was assessed as satisfactory (good or high) in 2010 according to the Programme of Measures in the ERBD Management Plan. This report suggests that main pressures on water quality are from abstractions, physical modifications and wastewater discharges. The stretch of the Yeomanstown Stream from its source to its confluence with the Liffey has been classified as 'moderate' under the Water Framework Directive (WFD) reporting period 2010-15 (from www.epa.ie). The Liffey is also moderate at this point, however improves to 'good' status until reaching Celebridge, whereupon it deteriorates for the remainder of its course. This assessment is 'unsatisfactory' and so remedial measures will be required to restore 'good ecological status', something that was due by 2015.

Details from the NPWS site synopsis report and the most recent data from BirdWatch Ireland's Wetlands Bird Survey (IWeBS) (Crowe et al., 2011) indicate that Dublin Bay is of international importance for wintering birds meaning that it regularly holds a population of over 20,000 birds. Total counts from IWeBS are shown in table 2.

Of the species listed in table 1 six: Curlew, Dunlin, Redshank, Pintail, Shoveler and Black-headed Gull are listed as of high conservation concern, and on BirdWatch Ireland's red list (Colhoun & Cummins, 2013).

- Dunlins do not breed on the east coast of Ireland while their winter range, which includes a number of coastal and wetland areas across the country, has declined by over 50% between 1994/5 and 2008/09. The reason for this decline is unclear.
- Wintering Redshank numbers in Ireland have changed little since the early 1980s while their breeding sites, based around wetlands west of the River Shannon and some eastern coastal areas, has fallen by 55% in 40 years. This can be attributed to habitat loss from agricultural intensification and drainage.
- Black-headed Gulls remain a frequent winter presence and their red listing relates to their breeding status only. This has seen a 55% decline in 40 years for reasons which are not clear but may relate to loss of nesting sites, predation, food depletion or drainage. They are not recorded as breeding in the Dublin area (Balmer et al., 2013).

A 'supporting document' has been published by the NPWS which gives a detailed assessment of the features of interest for which SPAs in Dublin Bay have been designated (NPWS, 2014). In particular it presents information on the trends of these features and the pressures which are likely to affect these trends. It has determined that five species: Grey Plover, Shelduck, Pintail, Shoveler, Golden Plover and Black-headed Gull, are of unfavourable status while the remainder are 'favourable'. In the case of the Grey Plover it was found that its population trend is decreasing both within Dublin Bay and at an

all-Ireland level. For this reason, it is reasonable to assume that the factors for its decline are not unique to Dublin Bay. The Black-headed Gull population was not assessed in this way. Only for Shoveler is it considered that significant declines are being experience due to site conditions.

Of relevance to this study this report highlights that poor water quality has long been an issue in Dublin Bay. This was manifest in macroalgal blooms of brown and green algae, particularly around Bull Island and the Tolka Estuary. Some improvements in the trophic status has occurred since the 1990s, particularly as a result of new wastewater treatment facilities at Ringsend in 2003. On-going improvements to water quality are highlighted as a potential risk to certain bird populations as a reduction in primary production (i.e. food for birds) may arise both as densities of invertebrates and algal mats is reduced.

Step 4: The Assessment of Significance of Effects

Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site.

In order for an effect to occur there must be a pathway between the source (the development site) and the receptor (the SAC or SPA). Where a pathway does not exist, an impact cannot occur.

The proposed development is not located within, or adjacent to, any SAC or SPA.

The site is approximately 33km from the boundary of the South Dublin Bay and River Tolka estuary SPA/SAC as the crow flies but following the flow of the River Liffey this distance is significantly greater. Because of this distance separating the two areas there is no pathway for loss or disturbance of species listed in table 1 or other semi-natural habitats that may act as ecological corridors for important species associated with the qualifying interests of the Natura 2000 sites.

There is a pathway from the site via surface and wastewater water flows to Dublin Bay via the Osberstown wastewater treatment plant and the River Liffey. As surface water from the site does not flow to the River Tolka there is no pathway between the site and the Tolka Estuary.

The plant at Osberstown is licenced to discharge treated effluent to the River Liffey by the EPA (licence no.: D0002-01). It has a capacity to treat wastewater for a population equivalent (P.E.) of 130,000. The Annual Environmental Report (AER) for 2016 (the most recent) shows that the average loading was well within this capacity while the standard of effluent was fully compliant with emission limit values set under the Urban Wastewater Treatment Directive. Monitoring of the receiving water (i.e. the River Liffey)

takes place at points upstream and downstream of the discharge point. The AER states that “the discharge from the wastewater treatment plant does not have an observable negative impact on the water quality”. This development will increase demand on the treatment plant however the existing evidence suggests that this will not result in pollution problems.

Water quality in Dublin Bay meanwhile is ‘good’.

The installation of surface water attenuation measures will ensure that there will be no negative impact to water quality or quantity arising from the change in land use from agricultural to residential.

During the site clearance and construction phase the risk of sediment entering water courses, entrained in rain run-off, is low as there are no water courses in this vicinity. This effect is not considered significant. Dangerous substances such as fuel and concrete will be controlled through good site management practices.

The site is too far from bird roosting areas to result in impacts from noise or other forms of human disturbance.

The development is not likely to affect amenity use at Natura 2000 sites due to the location of the development.

Are there other projects or plans that together with the project or plan being assessed could affect the site?

Eventual implementation of the WFD will result in overall improvements to water quality throughout the Liffey catchment although these targets have not been met by the 2015 deadline.

Environmental water quality can be impacted by the effects of surface water run-off from areas of hard standing. These impacts are particularly pronounced in urban areas and can include pollution from particulate matter and hydrocarbon residues, and downstream erosion from accelerated flows during flood events (Mason, 1996). There will no impact to surface water quality and quantity from this development due to the incorporation of proven SUDS methods.

Some land use change has occurred in this vicinity in the past decade as part of the growth of the town, and which has seen agricultural land converted to built development. This can impact upon biodiversity though disturbance effects and the cumulative impact of water pollution. Impacts to water quality arising from this project have been assessed and are not predicted to result in pollution.

Water quality in Dublin Bay can be influenced by multiple sources of effluent including diffuse run-off from agriculture or one-off houses. Substantial point sources also exist, particularly from the wastewater treatment plants at Leixlip (the Lower Liffey Regional Sewerage Scheme which also discharges to the Liffey) and the main treatment plant for Dublin city at Ringsend, which discharges to Dublin Bay. The former plant is currently complaint with its discharge licence however long-standing problems at Ringsend persist. The discharge here is not compliant with licence values and although upgrading works are planned, they may not be complete until 2021.

However, evidence suggests that some nutrient enrichment in coastal estuaries is benefiting wintering birds for which SPAs have been designated in Dublin Bay (Nairn & O'Hallaran eds, 2012).

The additional loading from this project to the Osberstown plant will contribute to capacity issues at that plant however it is not considered to be significant based on a number of points:

1. There is no evidence that pollution through nutrient input is affecting the conservation objectives of the South Dublin Bay and River Tolka Estuary SPA.

2. The Osberstown plant was fully compliant with all emission limit values in 2016 and sufficient capacity exists to treat the expected additional loading from this project.

There are no further effects which can act in combination with other similar effects, to result in significant effects to the SAC or SPAs in question.

List of agencies consulted

No third parties were contacted for nature conservation observations due to the low ecological sensitivity of the site.

Conclusion and Finding of No Significant Effects

This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects that will result in significant effects to the integrity of the Natura 2000 network.

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