

National Transport Authority

Tallaght/ Clondalkin to City Centre Core Bus Corridor Scheme

Appropriate Assessment Screening Determination

The National Transport Authority (the "NTA") is proposing to carry out the Tallaght/ Clondalkin to City Centre Core Bus Corridor Scheme (the "Proposed Scheme").

The Proposed Scheme has an overall length of approximately 15.5km with an additional offline cycling facility approximately 3.9 km.

It will be comprised of two main sections in terms of the route it follows; namely the Tallaght to City Centre section and the Clondalkin to Drimnagh section.

The first section, the Tallaght to City Centre section, begins at the junction of Blessington Road / Cookstown Way and is routed along Belgard Square West, Belgard Square North, Belgard Square East and Blessington Road to the junction of R819 Greenhills Road and Bancroft Park. From here the Proposed Scheme is routed along the R819 Greenhills Road to Walkinstown Roundabout via new transport link roads; in the green area to the east of Birchview Avenue / Treepark Road, in the green area to the south of Ballymount Avenue and in the green area to the east of Calmount Road. From Walkinstown Roundabout the Proposed Scheme is routed along the R819 Walkinstown Road to the junction with R110 Long Mile Road and Drimnagh Road. The shared spine with the Clondalkin section commences at this junction and the Proposed Scheme is routed along the R110 to the junction of Dean Street and Patrick Street via Drimnagh Road, Crumlin Road, Dolphins Barn, Cork Street, St. Luke's Avenue and Dean Street. From here the Proposed Scheme is routed along the R137 via Patrick Street to the junction at Winetavern Street and Christchurch Place where the Proposed Scheme terminates within the City Centre. An offline cycle facility is proposed to facilitate cycling between Walkinstown Roundabout and Parnell Road (Grand Canal) where end to end cycle facilities are not feasible along the main corridor and provides a more direct route towards the City Centre. This offline section of the Proposed Scheme is routed via Bunting Road, Kildare Road and Clogher Road.

The second section, the Clondalkin to Drimnagh section, begins at the junction of New Nangor Road and Woodford Walk and is routed along the R134 New Nangor Road, R810 Naas Road, R112 Walkinstown Avenue and the R110 Long Mile Road to the junction of Walkinstown Road and Drimnagh Road where it is routed towards the City Centre along the shared spine section as described above.

The Proposed Scheme, which will provide segregated cycling facilities, bus priority infrastructure and improvement pedestrian facilities, is within the South Dublin County Council (SDCC) and Dublin City Council (DCC) administrative areas.

Scott Cawley Limited were instructed to prepare an Appropriate Assessment Screening Report for the Proposed Scheme to consider, analyse and assess whether in view of best scientific knowledge and objective information and the conservation objectives of the European site(s) (which are discussed further

below), if the Proposed Scheme individually or in combination with other plans or projects is likely to have a significant effect on European Site(s).

The NTA has received and read the Appropriate Assessment Screening Report and has considered its content and its conclusions and recommendation set out therein. Having done this, the NTA agrees with the conclusions and recommendations as set out in the Appropriate Assessment Screening Report.

AA Screening Determination

The NTA has determined that an Appropriate Assessment of the Proposed Scheme is required as it cannot exclude, in view of best scientific knowledge and on the basis of objective scientific information, following the screening that the NTA has carried out, that the Proposed Scheme, either individually or in combination with other plans or projects, in the absence of mitigation, could have a significant effect on the following 17 European Site(s) (5 SACs and 12 SPAs) in view of the conservation objectives of those site(s):-

1. North Dublin Bay SAC,
2. South Dublin Bay SAC,
3. Rockabill to Dalkey Island SAC,
4. Lambay Island SAC,
5. Wicklow Mountains SAC,
6. Howth Head Coast SPA,
7. Dalkey Islands SPA,
8. Rockabill SPA,
9. North Bull Island SPA,
10. South Dublin Bay and River Tolka Estuary SPA,
11. Ireland's Eye SPA,
12. Malahide Estuary SPA,
13. Baldoyle Bay SPA,
14. Rogerstown Estuary SPA,
15. Skerries Islands SPA,
16. Lambay Island SPA, and
17. The Murrrough SPA.

The NTA has made this determination on the basis of having considered the baseline ecological environment; the extent and characteristics of the Proposed Scheme and having identified the following potential impacts:

- Habitat loss and fragmentation;
- Habitat degradation/effects on Qualifying Interests (QI) / Special Conservation Interest (SCI) species as a result of hydrological impacts;

- Habitat degradation as a result of introducing/spreading non-native invasive species; and
- Disturbance and displacement impacts.

Further detail is provided below on each of the potential impacts identified.

Habitat loss and fragmentation

There is no potential for direct habitat loss and fragmentation to occur as a result of the Proposed Scheme. Habitat loss may occur indirectly as a consequence of severe habitat degradation arising from a reduction in water quality and / or a change to the hydrological regime.

Special Conservation Interest (SCI) species for which SPAs in the vicinity of the Proposed Scheme have been designated are known to utilise ex-situ feeding sites in the Dublin area (i.e. Malahide Estuary SPA, Baldoyle Bay SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA and The Murrrough SPA).

Five potential inland feeding sites within the footprint of the Proposed Scheme were surveyed to inform the assessment. Construction Compound TC3 is proposed for an area of grassland between Greenhills Road and Treepark Road. In addition, amenity grassland between Greenhills Road and Birchview Avenue will be lost to facilitate the installation of a proposed cycle track and another area of grassland will be lost to accommodate proposed SUDs features between Greenhills Road and Tymonville Crescent. Low numbers of herring gull, black-headed gull and a single heron were recorded during winter bird surveys.

Construction Compound TC6 is proposed for an area within Tymon Park east of the M50. In addition, permanent land take at the edge of this site will also be required to accommodate proposed pedestrian and cyclist infrastructure. One black-headed gull and two oystercatchers were recorded flying over this site during winter bird surveys undertaken. Low numbers of herring gull and lesser black-backed gull were also recorded at Calmount Road, where Construction Compound TC7 is proposed for the duration of construction. Finally, Construction Compound TC8 is proposed at Bunting Park, where flocks of black-headed gull, herring gull and common gull were recorded during winter bird surveys undertaken.

The provision of Construction Compounds TC3, TC6, TC7 and TC8, to facilitate nearby construction works, will result in the temporary loss of suitable wintering bird habitat for the duration of construction of the Proposed Scheme. According to the data collected at these sites during winter bird surveys undertaken during both the 2020-2021 and 2021-2022 winter bird season, none of these sites are deemed to be significant inland foraging resources for wintering birds, given the low numbers, with respect to their national or international populations, of birds recorded here. Regardless, the Proposed Scheme will result (for the duration of the construction period) in the loss of a suitable inland feeding site for these SCI bird species. Therefore, there is potential for impacts on SCI species associated with SPAs to occur as a result of habitat loss / fragmentation. Therefore, there is potential for in-combination effects to occur.

Regarding the two raptor species for which Wicklow Mountains SPA are designated, according to the Scottish Natural Heritage Guidance during the breeding season the core foraging range for peregrine is estimated at 2km from the nest site, with the maximum recorded distance of 18km in Britain. During the winter season the mean foraging range reduces to 3km with the maximum range being 6.5km. Likewise, during the breeding season merlin are known to forage within 5km of the nest site, while in winter this generally reduces to 500m but can extend to 1.5km. Wicklow Mountains SPA lies approximately 7.3km south-east of the Proposed Scheme, which is well outside the typical foraging ranges for both peregrine and merlin. Therefore, likely significant effects on these two SCI bird species, as a result of ex-situ habitat loss / fragmentation, can be excluded.

With the exception of otter, the location of the Proposed Scheme and its construction will not result in any direct loss or fragmentation of Annex I habitats or supporting habitats to Annex II species, for which European sites are designated for within the zone of influence (ZoI) of the Proposed Scheme. In terms of otter, while the Proposed Scheme does cross the River Camac at Oak Road Business Park, it does so at an

existing crossing location within which the river is culverted. As such the river will not be subject to any instream works or alteration to the territory currently occupied by otter.

Habitat degradation / effects on QI / SCI species as a result of hydrological impacts

The Proposed Scheme has the potential to result in habitat degradation / effects on QI / SCI species as a consequence of hydrological impacts during the both the construction and operation phases. The release of contaminated surface water runoff and / or an accidental spillage or pollution event into any surface water features during construction, or operation, has the potential to affect water quality in the receiving aquatic environment, which in turn can affect any species which utilise this aquatic environment. Otter use riparian habitats for foraging and commuting purposes and therefore would be potentially at risk of hydrological impacts. Wicklow Mountains SAC, which is located approximately 5.3km south of the Proposed Scheme, is the closest European site for which otter is the QI species. Typically, otter territories are within the range of 7.5km for females and up to 21km for males. The Proposed Scheme interacts with the following watercourses: River Poddle, River Camac, Grand Canal, River Dodder (through the construction of Construction Compound TC4 and associated potential contaminated run-off), Liffey Estuary Upper and Liffey Estuary Lower. Whilst these watercourses lie within the typical territorial ranges of otters, only the River Dodder (Dodder_040) shares a hydrological connection to the Wicklow Mountains SAC. The Tallaght section of the Proposed Scheme also lies within the same subcatchment as Wicklow Mountains SAC (Dodder_SC_010 subcatchment). Therefore, there is potential for otter associated with the Wicklow Mountains SAC to move downstream and to come within the ZoI of the Proposed Scheme. A reduction in water quality as a result of an accidental pollution event (either alone or in combination with other pressures on water quality) however could result in the degradation of the local aquatic environment, which could in turn negatively affect the otter population through direct contact with pollutants or a decline in fish prey. Notwithstanding the limited interaction between Construction Compound TC4 and the River Dodder, habitat degradation / effects on the QI otter population for Wicklow Mountains SAC, as a result of hydrological impacts by the Proposed Scheme, cannot be discounted.

The remaining QIs for the SAC are habitats located upstream of the Proposed Scheme and will not be subject to any hydrological impacts as a result of the Proposed Scheme.

In addition, the Proposed Scheme is hydrologically connected to Dublin Bay via the River Camac (Camac_040), River Poddle (Poddle_010), Liffey Estuary Upper and Liffey Estuary Lower, as well as a network of established combined sewer / surface water pipes which discharge via Ringsend WwTP. The potential release of contaminated surface water runoff and / or an accidental spillage or pollution event into any surface water features during construction, or operation, has the potential to affect water quality in the receiving aquatic environment. Such a potential pollution event may include: the release of sediment into receiving waters and the subsequent increase in mobilised suspended solids; and the accidental spillage and / or leaks of contaminants into receiving waters. This occurrence could happen at any time during construction but could potentially be exacerbated by the removal of vegetation. It should be noted that a highly substantial event / events would be required to generate such quantities, which is not deemed likely. In the absence of mitigation, the associated effects of a reduction of surface water quality could potentially extend for a considerable distance downstream of the discharge point or location of the accidental pollution event. Such an occurrence, of a sufficient magnitude, either alone or in combination with other pressures on water quality, could undermine the conservation objectives of the European sites downstream in Dublin Bay (i.e. North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Rockabill to Dalkey Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA and Dalkey Islands SPA).

The QI habitats for which Howth Head SAC is designated (i.e., vegetated sea cliffs [1230] and European dry heaths [4030]) lie above the high water mark. Pollution is not regarded to be a threat or pressure which could potentially impact this SAC and is not regarded to be a significant threat / pressure to this habitat at a national level. Therefore, the QI habitats of Howth Head SAC will be unaffected by a degradation in the

surface water quality of the coastal waters of Dublin Bay and significant effects in that regard can be excluded.

In a potential worst case scenario, the release of contaminated surface water runoff and / or an accidental spillage or pollution event into any surface water features during construction, or operation, also has the potential to affect SCI bird species and QI marine mammal species that commute, forage and loaf in Dublin Bay i.e. birds associated with Skerries Islands SPA, Rockabill SPA, Lambay Island SPA, Ireland's Eye SPA, North Dublin Bay SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Dalkey Islands SPA and The Murrrough SPA, as well as marine mammals associated with Rockabill to Dalkey Island SAC and Lambay Island SAC. This reduction in water quality (either alone or in combination with other pressures on water quality) could result in the degradation of sensitive habitats present downstream, which in turn could negatively affect the SCI bird species that rely upon these habitats as foraging and / or roosting habitat. It could also negatively affect the quantity and quality of prey available to SCI and QI populations. In a worst-case scenario these potential impacts could occur to such a degree that the conservation objectives of the Skerries Islands SPA, Rockabill SPA, Lambay Island SPA, Ireland's Eye SPA, North Dublin Bay SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Dalkey Islands SPA, The Murrrough SPA, Rockabill to Dalkey Island SAC and Lambay Island SAC are undermined.

As the Proposed Scheme has the potential to result in habitat degradation and effects on SCI bird species and QI marine mammal species associated with European sites located in Dublin Bay, as the result of hydrological impacts, there is the potential for in combination effects to occur.

Habitat degradation as a result of introducing / spreading non-native invasive species

Six areas of Japanese knotweed, a species listed on the Third Schedule of the (Birds and Natural Habitats) Regulations 2011, are present within, or in close proximity to, the Proposed Scheme. Four of these areas of Japanese knotweed were recorded in an area of scrub and unmanaged grassland between the Nangor Road and Killeen Road. Construction Compound TC1 is proposed in this area. In the absence of mitigation, there is potential for this species to spread or be introduced, during construction and / or routine maintenance / management works, to terrestrial habitat areas in European sites downstream in Dublin Bay (i.e., North Dublin Bay SAC, South Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA). These in turn may result in the degradation of the existing habitats, in particular those habitats not permanently or regularly inundated by seawater, potentially outcompeting other native species and affecting species composition and physical structure of the habitat. Therefore, it is possible that the spread / introduction of non-native invasive species could undermine the conservation objectives of these European sites.

It is not considered possible that the listed non-native invasive species could spread to European sites that are located a considerable distance from the outfall locations of the River Camac, Poddle River, Grand Canal, Liffey Estuary Upper and Liffey Estuary Lower and separated by a large marine waterbody (i.e. Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, Ireland's Eye SPA, The Murrrough SPA and Dalkey Islands SPA).

As the Proposed Scheme has the potential to result in habitat degradation of the Qualifying / Special Conservation Interest species of European sites as a result of the spread of non-native invasive species, there is the potential for in combination effects to occur in association with other activities / plans / projects.

Disturbance and displacement impacts

A temporary and / or permanent increase in noise, vibration and / or human activity levels during the Construction Phase of the Proposed Scheme could result in the disturbance to and / or displacement of fauna species present within the vicinity of the Proposed Scheme. For mammal species such as otter, disturbance effects would not be expected to extend beyond 150m. For wintering birds, disturbance effects would not be expected to extend beyond a distance of approximately 300m, as noise levels associated with

general construction activities would attenuate to close to background levels at that distance. There are no European sites within the disturbance ZoI of the Proposed Scheme.

There are a number of coastal SPAs located in relatively close proximity to the Proposed Scheme which are designated for SCI species that are known to forage and / or roost at inland sites, such as amenity grassland playing pitches i.e. Malahide Estuary SPA, Baldoyle Bay SPA, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA and Lambay Island SPA, as well as The Murrough SPA (a distant site outside the typical 20km range but nonetheless supporting Brent Geese and a number of other SCI species that are recorded from Dublin Bay). Suitable inland foraging / roosting sites, which these bird species utilise, are located within the potential ZoI of the Proposed Scheme. Therefore, there is potential for the Proposed Scheme to result in disturbance / displacement impacts on SCI populations associated with European sites.

Regarding the raptor species, for which Wicklow Mountains SPA are designated (e.g. merlin and peregrine), a study by Ruddock & Whitfield, which included a review of previous studies in this area, offers no definitive distance after which disturbance to merlin is not significant but indicates that an upper limit of 300-500m may be sufficient in the case of breeding or nesting merlin. Likewise, a distance of 500-750m is likely to be sufficient for breeding peregrines. Adopting a precautionary approach, based on the available data regarding disturbance distances for merlin and peregrine, it can be concluded that disturbance to these bird species would be most likely to occur within 1km (i.e., the disturbance ZoI is 1km). There are no European sites within the disturbance ZoI; the next nearest European site (Wicklow Mountains SPA) to the Proposed Scheme is 4.3km away. There are also no habitat areas within the disturbance ZoI of the Proposed Scheme that support populations of the SCI species for which Wicklow Mountains SPA is designated. Considering the above, there is no potential for the Proposed Scheme to result in disturbance / displacement impacts on the SCI species for which Wicklow Mountains SPA is designated.

Although no signs of kingfisher were recorded during field surveys of the Proposed Scheme, kingfisher, an Annex I bird species, is known to be present in the wider study area, in particular, along the River Camac and the Grand Canal. Any kingfisher populations which are present in the vicinity of the Proposed Scheme are not considered to be associated with the SCI populations of any European site. Kingfisher territories can extend over approximately 3-5km of a river catchment. The nearest SPA for which kingfisher has been designated is the River Boyne and Blackwater SPA, which is located approximately 40.3km away. Therefore, kingfisher present in the vicinity of the Proposed Scheme are not associated with an SPA population.

Although no signs of otter were recorded during multidisciplinary field surveys of the Proposed Scheme, the River Dodder, River Camac and the Grand Canal are known to support otter, an Annex II and IV mammal species. The nearest SAC to the Proposed Scheme for which otter has been designated is Wicklow Mountains SAC which is located approximately 5.3km south of the Proposed Scheme. Research carried out on ranging behaviours of otter on river systems in Ireland found that female otter ranges averaged 7.5km while male otter home ranges varied up to 21km. The Proposed Scheme interacts with the following watercourses: River Poddle, River Camac, Grand Canal, River Dodder (through the construction of Construction Compound TC4 and associated contaminated run-off), Liffey Estuary Upper and Liffey Estuary Lower. Whilst these watercourses lie within the typical territorial ranges of otters, only the River Dodder (Dodder_040) shares a hydrological connection to the Wicklow Mountains SAC. The Tallaght section of the Proposed Scheme also lies within the same subcatchment as Wicklow Mountains SAC (Dodder_SC_010 subcatchment). Notwithstanding the limited interaction between Construction Compound TC4 and the River Dodder, it cannot be excluded that the otter population in the vicinity of the Tallaght section of Proposed Scheme is associated with the Wicklow Mountains SAC population. Therefore, disturbance and displacement impacts on the QI otter population for Wicklow Mountains SAC, as a result of the Proposed Scheme, cannot be excluded.

Although marine mammals associated with European sites may commute and forage within the Liffey Estuary, it is not considered to be likely that there will be any impacts on these species as a result of the

Proposed Scheme as it lies approximately 6.7km upstream of Dublin Bay, in a highly urbanised environment and where water levels can drop diurnally reducing the likelihood of marine mammals venturing this far up-river.

As the Proposed Scheme has the potential to result in the disturbance / displacement of the Qualifying / Special Conservation Interest species of a European site, there is the potential for in combination effects to occur in association with other activities / plans / projects.

Summary

The *ex-situ* habitat loss, hydrological, non-native invasive species and disturbance and displacement impacts associated with the Proposed Scheme have the potential to affect the receiving environment and, consequently, have the potential to affect the conservation objectives supporting the QIs / SCIs of a European site(s). Therefore, the potential for the Proposed Scheme to have significant effects on a European site(s) cannot be excluded.

In assessing the potential for the Proposed Scheme to result in a significant effect on any European sites, any measures intended to avoid or reduce the harmful effects of the Proposed Scheme on European sites are not taken into account.

In-combination effects

There is the potential for developments planned or granted, or those implemented under a range of land use and other plans, to lie either within European sites, or be situated in a location where they may be within the zone of influence of the European sites which also fall within the zone of influence of the Proposed Scheme.

Key development projects with potential for in-combination effects due to their size, nature and/or location include other Core Bus Corridor Schemes, MetroLink, upgrades to or new rail infrastructure, utility infrastructure including proposed or consented water utility improvement.

The potential for in combination effects between these plans and projects and the Proposed Scheme arises via the same pathways for potential effects as identified for the Proposed Scheme (i.e. habitat loss and fragmentation, hydrological, invasive species, and disturbance and displacement effects) which could act in combination with similar effects and pathways arising from the various plans and projects.

Therefore, the potential for the following in combination effects arising from plans and projects cannot be ruled out:

- Habitat loss (for example European sites at risk of *ex-situ* habitat losses; South Dublin Bay and River Tolka SPA, North Bull Island SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Lambay Island SPA, Ireland's Eye SPA and The Murrrough SPA);
- Habitat degradation / effects on QI / SCI species as a result of hydrological impacts (for example reduction in water quality in catchments draining to Dublin Bay affecting the conservation objectives supporting aquatic habitats and species in Wicklow Mountains SAC, North Dublin Bay SAC, South Dublin Bay SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Dalkey Islands SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Ireland's Eye SPA, Skerries Islands SPA, Rockabill SPA, Lambay Island SPA and The Murrrough SPA);
- Habitat degradation as a result of introducing / spreading non-native invasive species to European sites downstream of the Proposed Scheme (i.e., North Dublin Bay SAC, South Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA); and,

- Disturbance and displacement impacts (for example ex-situ inland feeding sites which are utilised by SCI wintering bird species within the potential disturbance ZoI of the Proposed Scheme for South Dublin Bay and River Tolka SPA, North Bull Island SPA, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA and The Murrrough SPA or QI mammal species for which Wicklow Mountains SAC is designated).

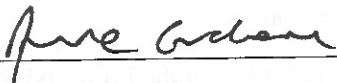
Conclusions of Screening Assessment Process

Following an examination, analysis and evaluation of all relevant information, in view of best scientific knowledge, and applying the precautionary principle, it can be concluded that there is the possibility for significant effects on the following European sites, in the absence of mitigation, either arising from the project alone or in combination with other plans and projects, as a result of habitat loss / fragmentation, hydrological impacts, non-native invasive species, and disturbance and displacement impacts: North Dublin Bay SAC; South Dublin Bay SAC; Rockabill to Dalkey Island SAC; Lambay Island SAC; Wicklow Mountains SAC, Howth Head Coast SPA; Dalkey Islands SPA; Rockabill SPA; North Bull Island SPA; South Dublin Bay and River Tolka Estuary SPA; Ireland's Eye SPA; Malahide Estuary SPA; Baldoyle Bay SPA; Rogerstown Estuary SPA; Skerries Islands SPA; Lambay Island SPA; and, The Murrrough SPA.

In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

The NTA has requested that Scott Cawley Ltd. prepare and finalise a Natura Impact Statement which will be submitted to An Bord Pleanála with an application for approval for the Proposed Scheme.

This determination is available for inspection at the National Transport Authority Offices, Dún Scéine, Harcourt Lane, Dublin 2, D02 WT20 and on its website at www.busconnects.ie.

Signed: 

For and on behalf of the BusConnects Programme Board of the NTA

Dated:- [1st November 2022]