

Appropriate Assessment (AA) Screening Determination for proposed Local Authority Development	
Project Name:	Proposed Baldoyle Community Centre, Racecourse Park, Red Arches Road, Baldoyle, Dublin 13
Ref No:	
Description:	
<p>Fingal County Council intends to develop a new Community/ Sports Centre on the grounds of the former Marketing Suite of 'The Coast' housing estate located along the south of Red Arches Road, The Coast, Baldoyle Racecourse Park, Baldoyle, Dublin 13.</p> <p>The development will consist of the removal of the existing single storey buildings on site (Marketing Suite and associated storage sheds and Changing Rooms) to replace with another single storey Community Centre building comprising facilities such as Sports hall, changing rooms, referee rooms, meeting rooms, toilet facilities and associated outdoor infrastructure such as car and bicycle parking and landscaping works.</p>	
Legislative Context:	
<p>This determination has considered the relevant legislative context and guidance, including;</p> <ol style="list-style-type: none"> 1) Articles 6 (3) and (4) of European Union (EU) Council Directive 92/43/EEC (Habitats Directive) and transposed into Irish law by the 2) European Communities (Birds and Natural Habitats) Regulations S.I. No 477 of 2011 (as amended) 3) Assessment of plans and projects significantly in relation to Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EU Commission, Brussels (2021) 4) Appropriate Assessment of plans and projects in Ireland: Guidance for planning authorities (DoEHLG, 2009), 5) Appropriate Assessment Screening for Development Management (Office of the Planning Regulator, 2021). 	
Screening Report:	
<p>Fingal County Council requested that an Appropriate Assessment Screening Statement be prepared. The Report, entitled 'Information to inform Appropriate Assessment Screening of a proposed project at Baldoyle, Dublin 13' was prepared by Limosa Environmental and reviewed by Fingal Ecologist, Jessica Clarke, prior to this Screening Determination being prepared.</p> <p>The AA Screening Report screened out any potential for alone or in combination effects of the proposed project on any SAC or SPA. From the report and reviewed literature, it is apparent that;</p> <ul style="list-style-type: none"> • The nearest European sites are Baldoyle Bay SAC & SPA (430 m north and 500 m east, respectively). • Managed grassland areas in the intervening land between Baldoyle Bay and the development site, such as Red Arches playing pitches, are utilised as ex-situ feeding grounds for species such as Light-bellied Brent Geese who are Qualifying Interests that commute between SPAs such as Baldoyle Bay, North Bull Island, Malahide Estuary and Rogerstown Estuary¹. 	

¹ Handby, Bearhop and Colhoun (2022) Understanding patterns of urban habitat use in overwintering light-bellied Brent geese in Dublin, Ireland (Unpublished Project Report in collaboration with Irish Brent Goose Research Project)

- There is no direct pathway for noise, dust, visual or hydrological impacts to affect any European Sites.
- Foul wastewater will be directed to an **existing** public foul network and treated therein before discharging via the Ringsend WWTP, which ultimately discharges to the Lower Liffey and is therefore connected hydrologically to South Dublin Bay SAC, South Dublin Bay and River Tolka SPA and North Dublin Bay SAC. Although the Ringsend WWTP is currently over capacity and due an upgrade in the near future, the primary discharge from the wastewater treatment plant does not have an observable impact on the Water Framework Directive status in the Liffey Estuary Lower, which has achieved 'good' ecological and chemical surface water status since 2010². A pre-connection enquiry made to Irish Water returned an outcome of 'feasible without infrastructure upgrade'.
- There are no open surface water bodies on site. A surface water body did previously traverse the site but this has been culverted and is inoperable due to heavy siltation. No direct impacts to this water body are likely to occur as a result of the proposal.
- Run-off or surface water that is generated within the site will be discharged to the existing storm water network. To facilitate this arrangement, works are required to connect the new on-site surface water collection network to the existing surface water network of pipes by connecting within a manhole located within the Red Arches Road to the north of the site. While the surface water network will ultimately discharge to Baldoyle Bay SAC via the Mayne River, the likelihood of significant inputs of silt or contaminants reaching downstream SACs or SPAs during these works is considered low. The surface water connection is to an existing network of pipes located in the road outside the boundary of the construction site. As no in-stream works are required to make this connection and the risk of contaminating the culverted surface water network with volumes of silt, dirty water or hydrocarbons can be controlled by adhering to best practice measures (e.g. Uisce Eireann Codes of Practice^{3,4}), significant effects to the Qualifying Interests of downstream Designated Sites during construction or operational phase is considered unlikely.
- Any surface water discharged from the site during the operational phase will be collected via SuDS measures implemented to a design standard. It is noted the SuDS measures proposed do not require any in-stream works or additional mitigation measures during their construction for the protection of downstream SACs or SPAs.
- The project is planned to commence in April 2024 and outdoor works to the building will be largely complete by August 2024. As stated in the AA Screening Report, significant impacts to any wintering birds that are Qualifying Interests of SPAs are unlikely as the majority of works that have the highest potential to cause visual or noise disturbance will be complete by August. This is outside the wintering period October to March, which is the core period that Brent geese occur in large numbers throughout Ireland⁵. Earlier sightings (the end of August) are confined to Strangford Lough where arriving geese initially congregate to refuel⁶.
- It is considered that once the large, visually intrusive and/ or noisy outdoor aspects of the project are complete and the works are largely indoors, that the level of activity on site will be similar to the background noise and activity levels of the area which is a busy residential area, with traffic and a playground.
- It is further considered that once the Community Centre structure is largely built and works have commenced indoors, that the works will be naturally visually screened from the Red Arches pitches by the newly built Community Centre as well as the existing tree planting

² [Data - Catchments.ie - Catchments.ie](https://data.catchments.ie)

³ [Wastewater-Code-of-Practice.pdf](#)

⁴ [Water-Code-of-Practice.pdf](#)

⁵ [About Brent Geese - Irish Brent Goose Research Group](#)

⁶ [Geese and Swans return to Ireland for the winter - BirdWatch Ireland](#)

that exists between the Community Centre and the pitches. The benefits of screening in minimising visual disturbances to waterbirds is recognised in the literature (Hockin, 1992; Borgmann, 2011)^{7 8}.

- The development of the Community Centre does not constitute an increase in the use of the playing pitches at Red Arches and the site itself is currently built land and artificial surfaces (BL3), therefore no long-term loss of ex-site feeding grounds will occur as a result of the project.

Further considerations.

While the AA Screening report submitted by Limosa has failed to include an assessment of potential impacts to the North-west Irish Sea SPA, I have included it herein. The North-west Irish Sea SPA is located approximately 1.5 km east of the site and is not directly linked to the development site. It is hydrologically linked to the proposed development site via the Baldoyle Bay SAC and therefore potential impacts to the water quality of the site are unlikely to occur as a result of this proposal for the same reasons that no likely significant effects to the Qualifying Interests of Baldoyle Bay SAC are likely to occur. The North-west Irish Sea SPA is designated largely to protect the feeding grounds of sea birds that feed on open water, these Qualifying Interests are therefore unlikely to come to land to feed on grassland ex-situ feeding grounds in significant numbers. The exception to this is some of the gull species, who will opportunistically feed in towns and cities⁹, and are therefore unlikely to be impacted by noise and visual disturbances associated with this development.

Conclusion

The report by Limosa Environmental concludes;

“Following the examination of relevant information, including in particular, the nature and design of the proposed project, this assessment concludes that significant impacts upon the qualifying interest species and the conservation objectives of any of the relevant Natura 2000 sites are highly unlikely (high degree of confidence).”

Screening Determination:

Fingal County Council have examined, analysed and evaluated the content of the proposed Community Centre development at Racecourse Park, Red Arches Road, Baldoyle, Dublin 13, including the information and assessments presented in the screening for appropriate assessment report and the OCEMP and are in agreement with the conclusion of the screening for appropriate assessment report with respect to the potential for the proposed project to have a likely significant effect on any European sites.

Fingal County Council have determined that, in light of best scientific knowledge, including in particular the nature of the predicted impacts that may arise from the project, and in the absence of any measures intended to avoid or reduce any harmful effects on European sites, that the project is not likely to have a significant effect on any European sites, either alone or in combination with other plans or projects.

Signed: 

⁷ Borgmann, K.L. (2011). A Review of Human Disturbance Impacts on Waterbirds. Audubon California.

⁸ Hockin, D., Ounsted, M., Gorman, M., Hill, D., Keller, V. & Barker, M. (1992). Examination of the effects of disturbance on birds with reference to the role of environmental impact assessments. Journal of Environmental Management, 36, 253-286

⁹ [Gulls allowed? | BTO - British Trust for Ornithology](#)

Role/ Department: Ecologist, Planning and Strategic Infrastructure

Date: 28th November 2023