

**Screening Report for Appropriate  
Assessment of development at lands  
at the Tallaght Athletic Football Club,  
Carolán Park, Ballymana Lane,  
Kiltipper, Dublin 24**

**Planning Reference: SD17A/0025**

**Compiled by OPENFIELD Ecological Services**

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## 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).

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 club house extension development on the site of the existing Tallaght Town AFC grounds, and its potential effects in relation to Natura 2000 sites (SACs and SPAs). Under the Planning and Development Acts, the Local Authority cannot grant planning permission where significant effects may arise to a Natura 2000 area. In order to make that decision the development must be screened for AA. This report provides the necessary information to allow South Dublin County Council to carry out this screening. The proposal is described thus, as per the planning application:

*A new clubhouse, extension to existing car park entrance, perimeter security fence and septic tank, including all associated landscaping and ground works.*

An application for this development was made in February 2017 (planning reference no. SD17A/0025). In March of that year a request for further information was made of the developer, item no. 9 of which stated:

*The site is located to the north of the Bohernabreena Reservoir and Glenasmole Valley Special Area of Conservation. Glenasmole Valley is a Natura 2000 site. Aerial photographs indicate that the nearest stream is located 755 metres to the south of the site at its nearest point. There is insufficient information provided to screen for Appropriate Assessment. The applicant is requested to submit details of Appropriate Assessment Screening which has been carried.*

This report fulfils this requirement.

## 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 Plan**

This step describes the aspects of the plan that may have an impact on the Natura 2000 site.

**Step 3: Characteristics of the 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 along 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 or not is dependent on whether the project is likely to have an effect on the conservation objectives of the site.

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.

**Brief description of the project**

The site location is shown in figures 1 and 2 while the proposed layout is given in figure 3.

It is planned to construct a new club house with car park extension and septic tank wastewater treatment system on the site at the Tallaght Town AFC grounds as previously described. This will involve a construction phase to include ground clearance and connections to infrastructure. A new, wider entrance will be installed along the Ballymana Lane, to replace the existing one.

The main phases of this project include:

- Site clearance
- A construction phase using standard building materials
- Construction will include a new surface water drainage infrastructure and connection to electricity and wastewater networks.
- Landscaping to include new hedgerow boundary treatment.
- An operation phase whereby the new facilities will be utilised

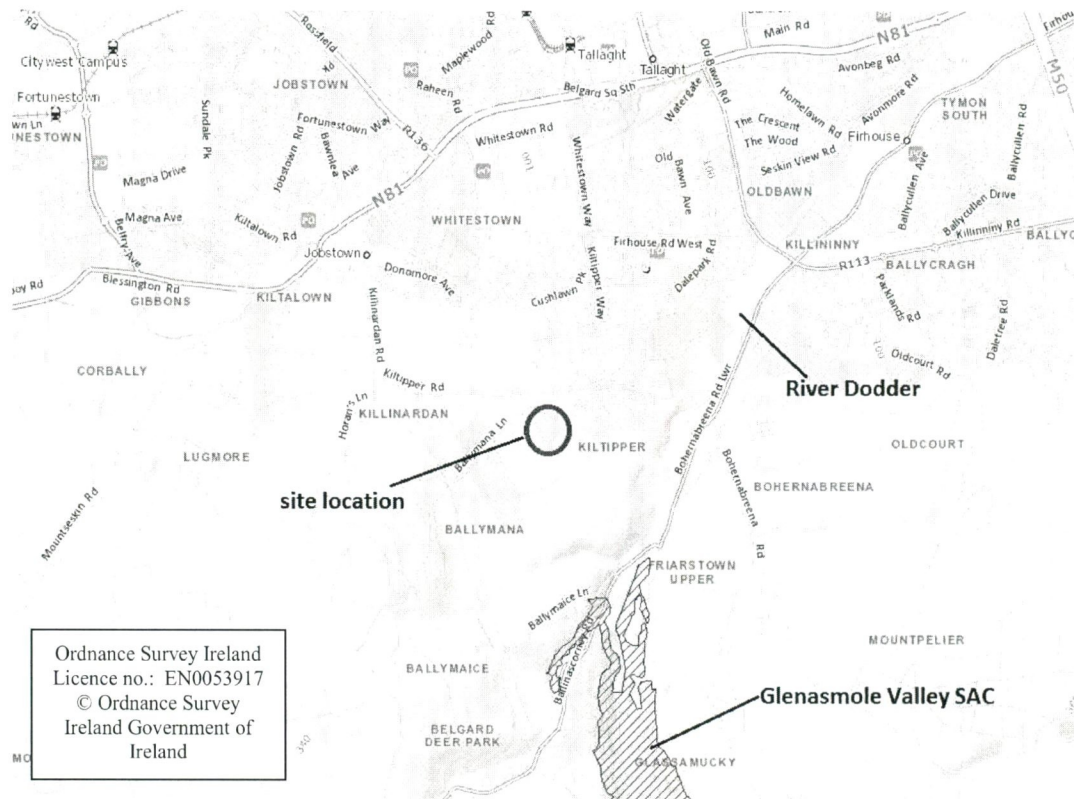


Figure 1 – Site location (red circle) (from [www.npws.ie](http://www.npws.ie)). Diagonal red lines indicate the SAC boundary.

The site is not located within or directly adjacent to any Natura 2000 area (SAC or SPA). This part of south Dublin is on the fringe of the city and is a combination of built-up residential zones and open farmland. Mapping from the [www.wfdireland.net](http://www.wfdireland.net) website shows that the lands are within the catchment of the Tallaght/Jobstown Stream. This is a short water course that rises in the Dublin Mountains and enters the River Dodder near the M50 motorway. The Dodder in turn discharge into the River Liffey in Dublin city centre. There are no water courses within, or in the immediate vicinity of, the site itself. The nearest water course is the Jobstown Stream, which can be found approximately 550m to the north-east at its nearest point.

The site was visited for this study on August 23<sup>rd</sup> 2017 which lies within the optimal period for general habitat survey (Smith et al., 2010). Habitats are described here in accordance with standard classifications (Fossitt, 2000). The main body of the site is an open field of **amenity grassland – GA2** which is surrounded by native **hedgerow – WL1** boundaries. These hedges are composed of a variety of species, such as Hawthorn *Crataegus monogyna*, Blackthorn *Prunus spinosa*, Ash *Fraxinus excelsior* and Sycamore *Acer pseudoplatanus*. Other habitats include a **treeline – WL2** of the non-native

Leyland Cypress *Cuprocyparis leylandii* and the car park, which is an **artificial surface – BL3**. With the exception of the native hedgerows, these are habitats of negligible biodiversity value.

There are no water courses on the site or habitats which would be considered wetlands. There is a stand of Himalayan Balsam *Impatiens glandulifera* within the hedgerow close to the car park. This plant is listed as alien invasive on Schedule 3 of SI No. 477 of 2011 and was treated by pulling from the ground. Under this legislation it is an offence to allow the spread of this plant.

No construction waste is to leave the site, thereby minimising the risk of spread of Himalayan Balsam. Management of the site to eradicate this weed will be incorporated into the landscaping plan. This will include provision for future vigilance and pulling plants from the ground as they appear (and prior to seeding).

Currently there is no attenuation of rain run-off and this is likely to percolate naturally to ground. New areas of hard surfacing will channel surface water run-off to a soakaway, a form of SUDS and designed in accordance with the BRE365 standard. This will ensure that no changes occur to the quantity, or quality of surface water run-off.



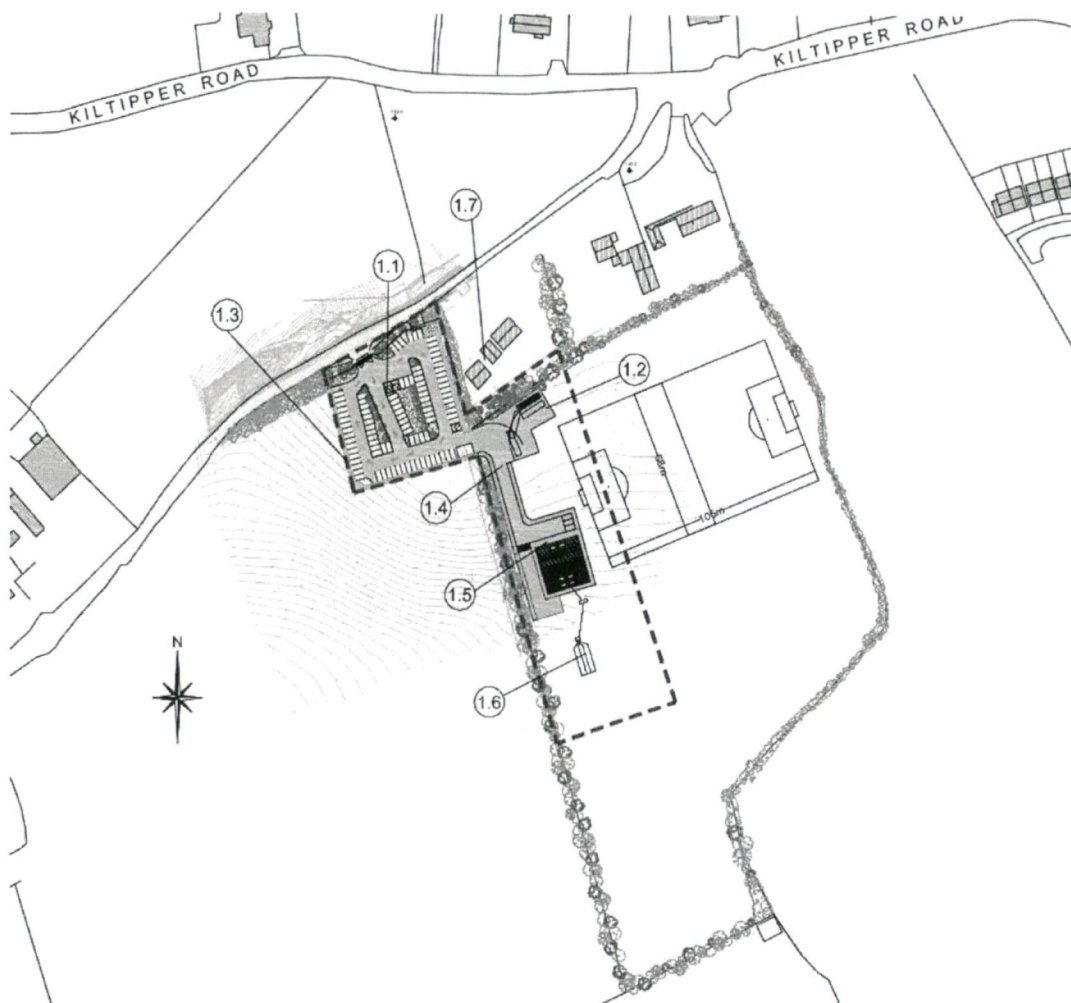
Figure 2 – Site boundary (aerial photo from [www.bing.com](http://www.bing.com))

Foul wastewater from the proposed development will be treated in a packaged wastewater treatment system to be installed in accordance with best practice

standards from the EPA. Its percolation area will be well in excess of the minimum separation distance from any water course. The developer will enter into a preventative maintenance contract with a suitably qualified professional. In this way pollution from this system is unlikely to occur.

There are no other discharges from this operation. Fresh water supply for the development will be via a new borehole well to be dug. There are no pathways for this abstraction to affect wetlands or other protected areas for nature conservation.

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



**Figure 3 – Proposed layout plan**

### 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 is one Natura area within this approximate radius: the **Glenasmole Valley SAC (site code: 1209)**. This is considered to be the only Natura 2000 area within the zone of influence of the development as pathways do not exist to other areas. Nevertheless, the subject site is in a separate hydrological catchment to the Dodder at this altitude and so there is no link between the two areas.

The Glenasmole Valley SAC is the flooded valley of the Dodder river, dammed to provide drinking water for the city of Dublin, and covering an area of nearly 150ha. Woodland has developed around its margins while species-rich grassland is to be found on some of its slopes. A number of rare plants species, including a variety of orchids, are to be found here.

The reasons why this area falls under the SAC designation are set out in the qualifying interests. They are habitat types listed in Annex I or species listed in Annex II of the Habitats Directive. This information is provided by the National Parks and Wildlife Service (NPWS) and is shown in table 1 below. In this case the SAC is designated only for protected habitat types. The status for each habitat is on a national scale and does not necessarily relate to features at Glenasmole (NPWS, 2013).

The boundary of the SAC in relation to the site is shown in figure 2.

**Table 1 – Qualifying interests for the Glenasmole Valley SAC (from NPWS)**

Code	Habitats	Status
6210	Orchid rich grassland/Calcareous grassland	Bad
6410	Molinea meadows	Bad
7220	Petrifying springs (priority habitat)	Intermediate

- **Orchid-rich grassland (6210)** This is a species rich grassland habitat found on well drained calcareous soils. It must be important for orchids in order to fall into this category. While there is evidence that an increased occurrence of flooding on some sites may be having a detrimental effect the principle threats listed are from agricultural intensification and 'stock feeding', i.e. overgrazing.



- **Molinea meadows (6410)** *Molinea caerulea*, the Purple Moor-grass, is typically associated with upland peatland habitats but this habit type occurs on lowland sites associated with traditional agricultural practices. The main threats that it faces are associated with changes in land use, e.g. land abandonment or intensification.
- **Petrifying Springs (7220)**: These are very localised habitats that arise from the precipitation of excess calcium carbonate in supersaturated running water. They are associated with characteristic bryophytes. They are vulnerable to changes in water quality, flow regime and intensification of land use practices (NPWS, 2013).

Whether the SAC is likely to be significantly affected must be measured against its conservation objectives. However, to-date site-specific conservation objectives have not been set out. Generic conservation objectives have been published by the NPWS. According to these generic documents 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 population on a long-term basis (NPWS, 2016).

**To maintain or restore the favourable conservation condition of the Annexed species for which the SPA has been selected.** (NPWS, 2016).

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,
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### **Data collected to carry out the assessment**

Aerial photography shows that habitats on the site are not associated with either intertidal habitats or species listed in table 2.

The EU's Water Framework Directive (WFD) stipulates that all water bodies were to have attained 'good ecological status' by 2015. This includes rivers and the Dodder system 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). Much of the Dodder, along with the Jobstown stream, and particularly downstream of the subject lands, is classified as of 'moderate' status (from [www.epa.ie](http://www.epa.ie)). This classification indicates that water quality in the river is of an insufficient standard to meet the requirements of the WFD. Future developments must not jeopardise this status. The waters near the Glenasmole Reservoir however are 'good'. The subject site is a separate catchment to the Dodder River.

The NPWS Conservation Statement for the Glenasmole Valley SAC contains detailed information on the location of important habitats and species. The main management issues identified in this document are:

- Agricultural intensification;
- Construction works at the reservoirs;
- Dumping;
- Grazing within the woodland;
- Housing development;
- Impacts of forestry and woodland management
- Inappropriate development of recreational facilities
- Natural succession
- Pollution, leachate from landfill
- Spread of alien species and amenity planting

Map 3 of this report gives an indicative habitat map and this shows that there is no link between the site and the SAC. There is little published data on the status of petrifying springs in Ireland. The Natura Data Form published by NPWS for the Glenasmole Valley SAC states that "there are no apparent threats to the petrifying springs".

## **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 890m from the boundary of the Glenasmole Valley SAC as the crow flies however it lies in a separate hydrological catchment to the subject lands. Because of the distance separating the two areas there is no pathway for loss or disturbance of habitats 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 no pathway from the site via surface and wastewater/groundwater water flows to the River Dodder as it passes through the Glenasmole Valley SAC.

Existing stands of Himalayan Balsam have been treated on the site. However, vigilance will be required as soil disturbance can result in new seed banks being disturbed. The landscaping plan which has been produced will ensure that this plant is not allowed to spread further. No effects can occur to the Glenasmole Reservoir arising from this source.

Negative effects therefore cannot occur.

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

Implementation of the WFD will result in continued improvements to water quality throughout the Dodder catchment. 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.

There can be no negative impact to surface water quality leaving the site due to the attenuation measures which are planned.

In 2005 the Greater Dublin Drainage Study (GDDS) was published as a policy document designed to provide for drainage infrastructure to 2030. The implementation of this policy will see broad compliance with environmental and planning requirements in an integrated manner. This is likely to result in a long-

term improvement to the quality and quantity of storm water run-off in the capital. This project is compliant with the requirements of this policy.

Because the wastewater treatment plant will be built and installed to modern standards, pollution is not expected, and so cannot act in combination with other diffuse sources.

There are no projects which can act in combination with this development which can give rise to significant effect to Natura areas within the zone of influence.

#### *List of agencies consulted*

The Development Applications Unit of the Department of Culture, Heritage and the Gaeltacht does not respond to requests for nature conservation observations after a project has entered the planning system.

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#### 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 to any SAC or SPA.

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