

**PROPOSED SHD APPLICATION
AT SANTA SABINA, GREENFIELD ROAD,
SUTTON**

TERRESTRIAL ECOLOGY REPORT

09/03/2020



*View of study site looking westwards across site (December 2019) –
bare ground and trees are the principal habitats*

*Prepared for
Parsis Ltd.*

by

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1.0 INTRODUCTION

This Ecology Report has been prepared to accompany a planning application under Strategic Housing Development (SHD) for permission to amend part of a previously permitted development at Santa Sabina Dominican College & Convent Complex, on a c. 2.46 hectare site off Greenfield Road, Sutton, Dublin 13 (Fingal County Council planning reg. ref. no.: F17A/0615).

This Report has been prepared by Dr. Brian Madden (BA. Mod. Hons., Ph.D., MCIEEM) of Biosphere Environmental Services, with input from Matt Hague, (BSc (Zoology), MSc; Ad.Dip. Plan. & En. Law, CEnv., MCIEEM) of Brady Shipman Martin.

2.0 BACKGROUND

In November 2018, Parsis Ltd. received planning permission from Fingal County Council (FCC planning reg. ref.: no.: F17A/0615) for a residential development of 96 no. dwelling units, a crèche, a revised access to the proposed development and a new access to the Santa Sabina Dominican College & Convent Complex, on a c. 2.46 hectare site off Greenfield Road, Sutton, Dublin 13.

Works for the provision of the new entrance and revised access to the college and convent complex, together with associated surface water attenuation and infrastructure works, commenced in February 2019. All trees scheduled for removal under the permission were felled as part of the initial works in February 2019. The new entrance and revised access were opened in summer 2019 and associated works were completed in late 2019. Tree and shrub planting scheduled for revised entrance/access is programmed for completion in Quarter 1 2020.

Construction works associated with the permitted residential scheme are also currently ongoing on site and include tree protection measures; establishment of site compound, site stripping, topsoil storage, provision of a second surface water attenuation tank and associated services; construction of site access, which utilises the route of the permitted development access road, and excavation of the permitted basement located under Apartment Blocks A-B1, B2-B3, C1 & C2.

3.0 PROPOSED DEVELOPMENT

As set out in the public notices, Parsis Ltd is now applying for planning permission through the Strategic Housing Development process for alterations to the permitted residential development. The proposed alterations relate to a c. 0.76 hectare portion of the previously permitted development site. The remainder of the development is being constructed in accordance with the existing permission (FCC planning reg. ref. no.: F17A/0615).

The alterations to the development seek to provide for an increase from 55 no. residential units to 102 no. residential units within the portion of the overall site subject to the proposed alterations, thereby increasing the unit numbers from 96 to 143. The proposed

alterations are located entirely on lands zoned RS-Residential in the Fingal County Development Plan 2017-2023.

No alterations are proposed to permitted Blocks B2-B3 (24 no. units) and C2 (17 no. units), which contain a total of 41 no. apartments and a crèche, or that portion of the basement located beneath these blocks.

Likewise, no changes are proposed to the previously permitted public open spaces and play areas located to the south and east of the development. No trees other than those previously permitted for removal, and felled in February 2019, are to be removed for the proposed amended development.

This Ecology Report describes habitats, flora and fauna associated with the site. A bat survey was undertaken in September 2018 by bat specialist Mr Brian Keeley MCIEEM, and an additional bat survey was undertaken in December 2019 to inform the current application (refer to Appendix 1).

4.0 SURVEY METHODS

Site visits were made by consultant ecologist Dr Brian Madden on 26th March and 6th December 2019 to establish current baseline conditions in respect of habitats and species of flora and fauna. This involved a systematic walk-over survey of the site (as was feasible). Habitat classification is according to Fossitt (2000). Vascular plant species nomenclature in this report follows Stace (2010).

Observations were made on fauna species present or likely to occur on site (from evaluation of habitats).

During the survey, attention was given to the possible presence of habitats and/or species which are legally protected under Irish or European legislation (notably the Flora Protection Order 2015; Wildlife Act 1976; Wildlife Amendment Act 2000; EU Habitats Directive; EU Birds Directive European Communities (Birds and Natural Habitats) Regulations 2011 as amended).

The standard ecological literature was reviewed for possible reference to the site area (see References and Bibliography). The NPWS website (www.npws.ie) was accessed for information on designated sites and protected species.

5.0 BASELINE ENVIRONMENT

5.1 Physical character of site

The overall development site (see Figure 1) is located off Greenfield Road, Sutton, Dublin 13. The site is located between Santa Sabina Dominican College and St. Fintan's Parish Church. Established residential housing (Glencarraig Estate) occurs to the north. Greenfield Road skirts the site on its southern side, with Sutton Creek to the south of the Greenfield Road. The majority of the site comprises recently cleared ground and construction works are on-going under the previous grant of permission (F17A/0615).

There are no open streams or drainage channels on site, as confirmed by the walkover survey and by EPA mapping (<https://gis.epa.ie/EPAMaps/>). The nearest watercourse is the Howth Stream located 1.7 km upgradient of the site. This stream, which flows through the Deerpark Estate, discharges into Baldoyle Bay on the north side of the peninsula. It is not connected to the site.

Existing stormwater drainage from the site is to an existing 750mm diameter concrete surface water sewer running along the western boundary between the site and St. Fintan's Church lands. This currently drains the areas of the Glencarraig estate to the north and Saint Fintan's Catholic Church site to the west before discharging to Sutton Creek (Dublin Bay) to the south of Greenfield Road.



Figure 1: Satellite photograph of overall site (red line) and the SHD application area (purple line) with surrounding context (source: Google Maps)

5.2 Habitats, vegetation and flora

The site comprises the following Fossitt Category habitats:

- Spoil and bare ground ED2
- Amenity grassland GA2
- Scattered trees and parkland WD5
- Ornamental/non-native shrub WS3
- Buildings and artificial surfaces BL3
- Hedgerow/tree line WL1/WL2

The majority of the area is **Spoil and bare ground** associate with construction works, which commenced in March 2019. This area is largely devoid of vegetation (see Plate 1). Ruderal species have become established in places, including dandelion (*Taraxacum* spp.), creeping buttercup (*Ranunculus repens*), plantain (*Plantago major*), and groundsel (*Senecio vulgaris*). At the time of the December survey, temporary pools of water from recent rainfall was present in places, though this has since drained (January 2020).

Small remnant areas of **Amenity grassland** occur along the site entrance (former school entrance), where mature trees are being retained. These trees have been fenced for protection from ground clearing works (see Plate 2). The grassland is a rank sward and includes species such as rye-grasses (*Lolium* spp.), clovers (*Trifolium* spp.), yarrow (*Achillea millefolium*), self heal (*Prunella vulgaris*), common knapweed (*Centaurea nigra*). **Scattered trees** on site are predominantly sycamore (*Acer pseudoplatanus*). These include six fairly mature specimens (groups of 4 and 2) in the northern sector of site which are the remnant of a former treeline and a group of up to ten along the eastern side of the former school entrance avenue. An intermittent line of low to medium sized trees, mainly ash (*Fraxinus excelsior*) occurs along the western boundary with the church grounds.

The enabling works area (attenuation tank) and car parking are classified as **Buildings and artificial surfaces**. Works associated with the new school entrance and access road in the southeastern part of the site, including the installation of an attenuation tank, are currently nearing completion.



Figure 2: Habitat Map

5.3 Fauna

Mammals, amphibians and reptiles

The study site has largely been cleared of vegetation to facilitate permitted development in accordance with the existing planning permission on the subject site (which the current application seeks to amend in part) and has low potential for mammal species. Red fox (*Vulpes vulpes*) may pass through the site at times (as it is widespread in the Sutton area) and small mammals such as pygmy shrew (*Sorex minutus*), brown rat (*Rattus norvegicus*) and house mouse (*Mus domesticus*) could also be expected within marginal areas.

The site does not have potential for larger mammals such as badger (*Meles meles*).

Previous surveys have shown that the trees on site provide useful habitat for several bat species (refer to Appendix 1).

The site does not have permanent open water to support the common frog (*Rana temporaria*) or common newt (*Lissotriton vulgaris*). The presence on site of the common lizard (*Lacerta vivipara*) is not expected.

Birds

A small number of bird species were recorded associating with the trees and shrubs on site – these were all common species of garden and parkland habitats and included robin

(*Erithacus rubecula*), wren (*Troglodytes troglodytes*), blackbird (*Turdus merula*), great tit (*Parus major*) and chaffinch (*Fringilla coelebs*). Also present on site were jackdaw (*Corvus monedula*) and magpie (*Pica pica*). Pied wagtail (*Motacilla alba*) was recorded along the school avenue.

In December, eight herring gulls (*Larus argentatus*) were feeding and bathing in the pools associated with the bare ground and a further five were resting on the bare soil. Due to the habitats present, the site would not be expected to support on a regular basis any wintering bird species of conservation importance.

Brent Geese (*Branta bernicla hrota*) feed on the grassland strip opposite the site (between Greenfield Road and the shoreline) with up to 160 present on 6 December 2019 (see Plate 3).

5.4 Designated sites for nature conservation

No part of the study site is covered by a nature conservation designation. However, the site is close (the main site is c.50 m removed, whilst the site entrance is removed by c.30 m) to Sutton Creek which is part of the North Bull Island/North Dublin Bay complex, which is designated as follows:

- North Dublin Bay Special Area of Conservation (code 00206)
- North Bull Island Special Protection Area (04006)

Any potential impacts on European sites are fully appraised in the accompanying Natura Impact Statement.

The above sites are also proposed Natural Heritage Areas (site list published on a non-statutory basis in 1995 but have not since been statutorily proposed or designated).

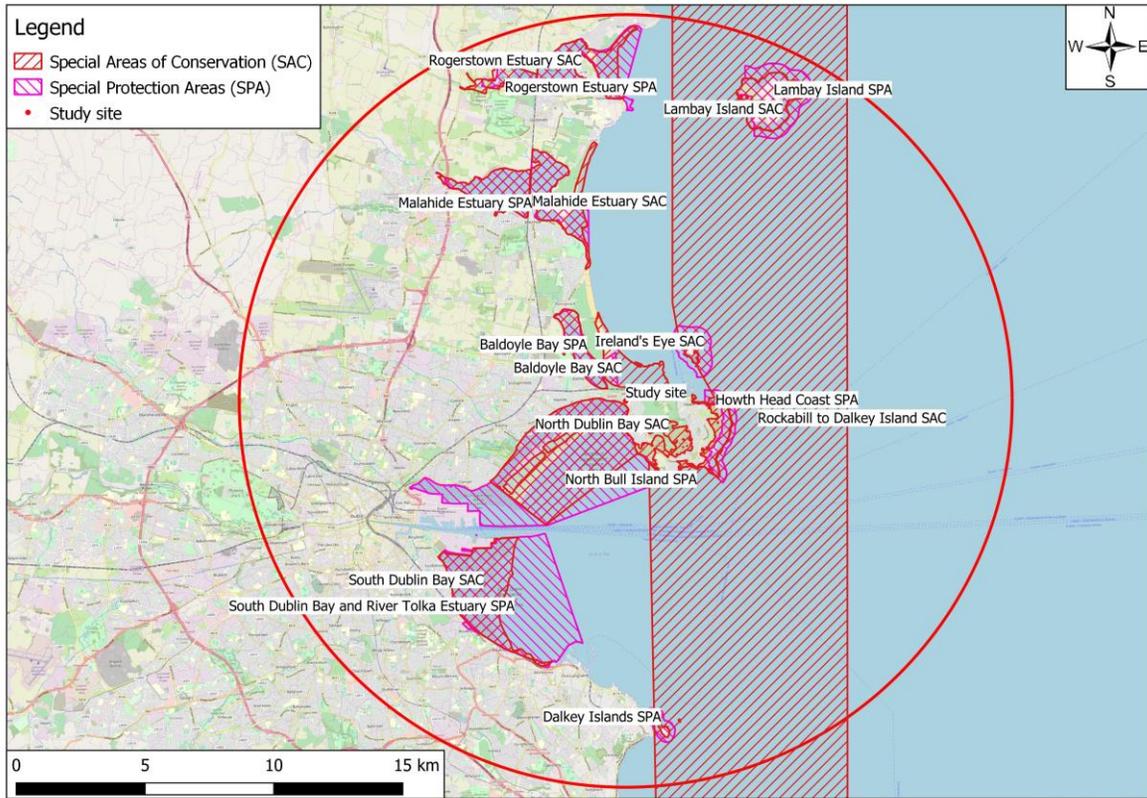


Figure 3: European sites within 15km of the Site (source: Google Maps)



Figure 4: proposed Natural Heritage Areas (pNHA) within 5km of the Site (source: Google Maps)

5.5 Rare and protected flora

There are no historic records of legally protected plant species or Red listed species (Doogue et al. 1998, Wyse Jackson *et al.* 2016) from the site nor would the habitats present on site have potential to support any rare flora species.

5.6 Overview of ecological importance of survey area

The site has low ecological interest reflecting its current status as an active development site, where works are ongoing to implement the existing planning permission pertaining to the site.

The principal interest lies in the remaining mature trees on site – whilst it is noted that these are predominantly of a non-native species (i.e. sycamore), any mature tree is of local value for insects, bats and birds. The mature trees are retained as part of the permitted development which is currently being implemented, and the current application also provides for the retention of these trees.

Apart from probable bat species using the mature trees, there is no fauna species associated with the site of particular conservation. While robin is an Amber-listed species (i.e. of moderate conservation concern, Colhoun & Cummins 2013), it is a widespread species of gardens and parks. The presence of herring gull (Red-listed) is not unsurprising as this species will opportunistically avail of feeding and roosting opportunities.

With the exception of the mature trees, which are to be retained and are of potential value for roosting bats, overall the site is of Local Importance (Lower Value), in accordance with the ecological resource valuations presented in the National Roads Authority Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA/TII, 2009 (Rev. 2)). As such it contains no “key ecological features.

6.0 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

The proposed amendment application seeks to provide for an increase from 55no. residential units to 102no. residential units within the portion of the overall site subject to the proposed alterations. This will increase overall unit numbers from 96 no. to 143 no., primarily through the provision of two additional floors to the previously permitted 3-storey Blocks A-B1 and C1, and by replacing the previously permitted 10 no. 2 & 3-storey houses with 3 no. 3-storey apartment blocks (D1, D2 & D3). The alterations also include for changes to elevations, parking, the area of the basement with the application area and ancillary works. The proposed amendments do not materially change the development plan area of the previously permitted layout.

The proposed alterations are located entirely on lands zoned RS-Residential in the Fingal County Development Plan 2017-2023.

No alterations are proposed to permitted Blocks B2-B3 (24 no. units) and C2 (17 no. units), which contain a total of 41 no. apartments and a crèche, or that portion of the basement located beneath these blocks.

Likewise, no changes are proposed to the previously permitted public open spaces and play areas located to the south and east of the development. No trees other than those previously permitted for removal, and felled in February 2019, are to be removed for the proposed amended development.

7.0 POTENTIAL IMPACTS

7.1 Impacts during construction

Habitats and flora

As the proposed development is committed to retaining all trees presently on site (and protective measures are already in place for mature trees), impacts on habitats or flora species of significance are not predicted by the construction phase of the proposed project.

Fauna

It is not expected that there will be any significant impacts on ecological receptors such as nesting birds or commuting or foraging bats as a result of the proposed development.

Similarly, there will be no impacts on badgers and other large mammals, amphibians, reptiles, lepidoptera or other species groups as a result of the proposed development.

Designated sites

The potential for impacts on European sites has been appraised separately (refer to the accompanying Natura Impact Statement). The conclusion of the NIS is that the proposed project does not have potential to impact on any European site.

7.2 Impacts during operation

Once constructed, it is not anticipated that the operation of the scheme would have adverse impacts on habitats or wildlife. The maturing landscaped area on site will provide habitat for a range of common mammal and bird species.

The potential for impacts on European sites has been appraised separately (refer to the accompanying Natura Impact Statement). The conclusion of the NIS is that the proposed project does not have potential to impact on any European site.

8.0 MITIGATION MEASURES

The mature trees at Santa Sabina, which will be retained, are being protected in accordance with the requirements of the permitted development. The tree protection fencing will be retained in place for the duration of the construction phase.

Three Schwegler 2F bat boxes (including one with a double front) have been erected on trees at Santa Sabina. An additional box (e.g. Schwegler 1WI) will be installed within one of the new apartment blocks, at the appropriate time.

As noted in the site lighting report prepared by PMEP that accompanies the amendment application, the lighting design also takes into consideration the environmental impact of

artificial lighting on existing flora and fauna in the area. No further mitigation is required for the protection of bats.

The planting proposed for the development will, wherever possible, comprise an appropriate mixture of native and carefully selected non-native species. The planting will also incorporate a range of species that will attract feeding invertebrates, including moths, butterflies and bees. It will take account of and implement the relevant objectives of the All-Ireland Pollinator Plan 2015-2020 (<http://www.biodiversityireland.ie/wordpress/wp-content/uploads/All-Ireland%20Pollinator%20Plan%202015-2020.pdf>)

Specific mitigation measures designed to protect European sites are included within the accompanying NIS and the Construction Environmental Management Plan (prepared by DBFL) for the proposed development. These include strict measures to ensure the protection of water quality.

9.0 RESIDUAL IMPACTS / CONCLUSION

The proposed development comprises amendments to a previously permitted development (Reg. Ref.: F17A/0615). The permitted development is currently under construction on the subject site.

It is considered that, following the implementation of the mitigation measures set out in this report (and in the accompanying NIS) there will be no long-term residual impact on any ecological receptors within or in the vicinity of the site, or associated with any site designated for nature conservation as a result of the proposed development.

10.0 REFERENCES AND BIBLIOGRAPHY

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11.0 PLATES



Plate 1. The majority of the site comprises recently cleared ground - looking northeast across site (28/01/2020).



Plate 2. View of mature trees in grassland, which are being retained on site and are surrounded by protective fencing (28/01/2020).



Plate 3. Brent Geese feed on the strip of grassland between Greenfield Road and the shoreline (06/12/19).

APPENDIX 1 – Note on the Bat fauna at Santa Sabina

1.0 Introduction

This note has been prepared by Brady Shipman Martin, Landscape Architects for the project, in consultation with bat specialist Brian Keeley, MCIEEM.

In November 2018 Parsis Ltd. received planning permission from Fingal County Council (FCC planning reg. ref.: no.: F17A/0615) for a residential development of 96 no. dwelling units, a crèche, a revised access to the proposed development and a new access to the Santa Sabina Dominican College & Convent Complex, on a c. 2.46 hectare site off Greenfield Road, Sutton, Dublin 13.

Works for the provision of the new entrance and revised access to the college and convent complex, together with associated surface water attenuation and infrastructure works, commenced in February 2019. All trees scheduled for removal under the permission were felled as part of the initial works in February 2019. The new entrance and revised access were opened in summer 2019 and associated works were completed in late 2019. Tree and shrub planting scheduled for revised entrance/access is programmed for completion in Quarter 1 2020.

A number of bat boxes, required to be installed as part of the implementation of the existing permission, have been erected. A total of three boxes (Schwegler 2F boxes, including one double-fronted box) have been installed on retained trees on the site.

Construction works associated with the permitted residential scheme are currently on-going on site and include tree protection measures; establishment of site compound, site stripping, topsoil storage, provision of a second surface water attenuation tank and associated services; construction of site access, which utilises the route of the permitted development access road, and excavation of the permitted basement located under Apartment Blocks A-B1, B2-B3, C1 & C2.

2.0 Proposed development

As set out in the public notices, Parsis Ltd are now applying for planning permission through the Strategic Housing Development process for alterations to the permitted residential development. The proposed alterations relate to a c. 0.76 hectare portion of the previously permitted development site. The remainder of the development is being constructed in accordance with the existing permission (FCC planning reg. ref.: no.: F17A/0615).

The alterations to the development seek to provide for an increase from 55 no. residential units to 102no. residential units within the portion of the overall site subject to the proposed alterations, thereby increasing the overall unit numbers from 96 no. to 143 no. The proposed alterations are located entirely on lands zoned RS-Residential in the Fingal County Development Plan 2017-2023.

The additional units are primarily being provided through the:

- Provision of 2 additional storeys to Block A-B1 (*i.e.* an increase from 3 to 5-storeys) and alterations to the 3 permitted floors below to provide a five-storey building containing 42 no. apartments;
- Provision of 2 additional storeys to Block C1 (*i.e.* an increase from 3 to 5-storeys) and alterations to the 3 permitted floors below to provide a five-storey building containing 28 no. apartments; and

- Replacement of Block D, comprising 10 no. two and three storey semi-detached houses, with 3 no. three-storey apartment buildings (Block D1, D2 and D3) containing 32 no. residential units.

Other proposed alterations involve the provision of balconies/terraces to Blocks A-B1 and C1, alterations to the permitted basement below these blocks, alterations to the provision of cores in these blocks and to associated car and cycle parking, as well as the provision of a new ESB sub-station and switchroom building, and alterations to permitted car and cycle parking at basement and ground level. The proposed alterations include all associated ancillary site development works.

No alterations are proposed to permitted Blocks B2-B3 (24 no. units) and C2 (17 no. units), which contain a total of 41no. apartments and a crèche, or that portion of the basement located beneath these blocks.

Likewise, no changes are proposed to the previously permitted public open spaces and play areas located to the south and east of the development. No trees other than those previously permitted for removal, and felled in February 2019, are to be removed for the proposed amended development.

3.0 Baseline information and previous bat report

A comprehensive appraisal of bat activity at the site was submitted with the original, permitted application. That report, *A Bat Assessment of The Grounds of Santa Sabina Dominican College, Sutton, Fingal, County Dublin And an Evaluation for Potential Impacts of The Development on the Bat Fauna*, was prepared by bat specialist Brian Keeley MCIEEM. Daytime and dawn/dusk surveys were undertaken as part of that survey in September 2018.

The 2018 surveys indicated that no bats were recorded as roosting in the trees at Santa Sabina, although it noted the possibility that a soprano pipistrelle was roosting in the trees in the north-western area. The report recorded a total of five species feeding within the site (common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, Leisler's bat and brown long-eared bat).

The 2018 report concluded that, post mitigation, *"this development will have no direct impact on the conservation status of bats"*.

3.0 Current application

In preparing the current application, bat specialist Brian Keeley visited the site in December 2019 to undertake a visual assessment of the proposed development site and its potential for use by bats.

This 2019 survey confirmed that no trees, and no other features potentially suitable for use by roosting bats will be removed to facilitate the proposed development, which, as noted previously comprises an amendment to the previously granted permission. All tree and vegetation removal required under the existing permission had been undertaken. Bat boxes required to be erected in trees have been installed.

The lighting for the proposed amended development has been designed by PMEP (refer to the Site Lighting Report that accompanies the application), and takes into account the appropriate guidelines for designing lighting to minimise impacts on wildlife^{1, 2}. As was the case with the permitted

¹ Bats and Lighting – Guidance Notes for Planners, Engineers, Architects and Developers (Bat Conservation Ireland, 2010)

² Bats and Lighting in the UK – Bats and the Built Environment Series (Institute of Lighting Professionals, September 2018)

development there will therefore be no impacts from lighting associated with the proposed amended development.

Similarly, there are no changes to the predicted impacts associated with vegetation loss addressed in the permitted application. As noted in the bat report submitted with the original application for the permitted development, *reduced vegetation including the removal of the trees may lead to reduced insect abundance. This is unlikely to be highly significant in terms of bat fauna within this site as the site has several sites used by bats but there are likely to be relatively small numbers of bats present [...]. This will be a permanent slight negative impact.*

Again, as noted previously, all tree and vegetation removal required under the existing permission has been undertaken.

The mitigation proposed for the proposed development is unchanged from that proposed for the original, permitted development:

- No tree removal will be required – all such works have already been undertaken as part of the permitted development;
- The lighting design is appropriate to the site and takes account of requirements to minimise any impacts on habitat and fauna. No further mitigation is necessary;
- As part of the landscape design for the proposed development, native and locally appropriate species will be planted, incorporating a range of species that will attract feeding invertebrates, including moths, butterflies and bees. It will take account of and implement the relevant objectives of the All-Ireland Pollinator Plan 2015-2020;
- As well as the bat boxes already installed as required under the existing permission, an additional box (such as Schwegler 1WI) will be installed in an external wall of one of the apartment blocks.

The proposed amendments are minor in an ecological context and it is concluded that post mitigation this development will have no direct impact on the conservation status of bats.