

Chapter/ Section	Section 4.3.2 Strategic Corridor Objectives – Corridor 5: Camac River
Amendment ref.	Amendment 4.10
Page no.	168
Policy/Objective No.	Addition to Section 4.3.2 – Strategic Corridor 5: Camac River Corridor
Text/Policy/Objective Amendment Wording	
<p>Addition to Section 4.3.2 – Strategic Corridor 5: Camac River Corridor – Table 4.1</p> <p>Insert under Stepping Stones in the first column:</p> <p>Rathcoole Alluvial Woodlands within RU zoning.</p> <p>Add the following objective to the second column:</p> <ul style="list-style-type: none"> To preserve and protect the Alluvial Woodlands at Rathcoole within the zoning RU as an environmentally sensitive area for biodiversity and ecosystems services of importance having full regard to their Annex 1 status. 	

The Four Districts Woodland welcomes the opportunity to provide an observation and contribute to the public consultation on the material alterations to the Draft County Development Plan.

While we very much welcome the recognition of the Alluvial Woodland, and its incorporation into the Green Infrastructure Network, we urge the Chief Executive to reconsider his position on Rathcoole Woodlands as a core area:

Given the size of the woodlands, it is considered that they are more properly identified as a stepping stone and should be included in that list. It should be noted that the inclusion of the woodlands as a stepping stone rather than as a core area does not in any way diminish their habitat or amenity value and that the objectives associated with both apply.

Rathcoole Woodlands is of a suitable size to be considered a core area in the Green Infrastructure Network. Rathcoole Woodlands contains a **substantial Alluvial Native Woodland** at 12.8 ha (Hodd, 2021 unpublished) given that the National Survey of Native Woodlands found¹: *'The majority of surveyed woodlands were small or very small in extent, with 50% of sites being 6 ha or less..., over*

¹ <http://www.botanicalevironmental.com/wp-content/uploads/2011/03/Volume-1.pdf>

two thirds (67.8%) of sites were 10 ha or less and only 3.3% of sites surveyed were 50 ha or more, with just ten sites over 100 ha...This reflects the highly fragmented nature of the Irish woodland resource..'

Priority habitats are deemed to be in **danger of disappearance**, in view of the proportion of their natural range within the EU. Habitat 91E0 is a national resource. There is no other record of this habitat in the County of Dublin.

We note that the Corkagh Park is identified as a Core Area, which lacks the connectivity to the broader environment. It has no direct continuous land or water connectivity with any of the stepping stones identified in Corridor 5: Camac River Corridor given that both the land and water is intercepted for example by the M7 with no biodiversity land bridges and all water culverted. Rathcoole Woodlands currently has great connectivity with the surrounding lands; Rathcoole Park and Agricultural lands, with hedgerows, river corridors and a variety of habitats. Rathcoole Woodlands in conjunction with Rathcoole Park, and adjacent rewilding areas, promises to be a powerful core area for biodiversity and nature.

The Council's own ecological assessment found that *'overall the site is currently considered to be of County ecological importance for its mosaic of Annex I (priority) habitats, species-rich semi-natural habitats, heritage value hedgerows, wetland habitats and mosaic of wooded and non-wooded semi-natural habitats which are rare in County Dublin'*.

The realisation of the new proposed CS10 SLO1:

Ensure the provision of a primary school, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, access road and open space is provided in tandem with new residential development.

will result in:

- the reduction in existing woodland area
- the disconnection of Rathcoole Woodlands from Rathcoole Park by grey infrastructure (roads and buildings)
- habitat fragmentation

Additional grey infrastructure (roads and buildings) development will be facilitated by rezoning land to Res_N. This will result in dividing the rewilding area and enveloping woodland on 3 sides with grey infrastructure. The reduction in woodland area and in connectivity will diminish the Woodlands habitat and amenity value. Therefore, the Woodlands prospects as a core area of Green Infrastructure Network will also be considerably reduced, leaving its status to a stepping stone.

We note that for L7 – Citywest-Saggart Link (see Appendix 4 Green Infrastructure Local Objectives and Case Studies of the Draft County Development Plan 2022-2027) is stated as presenting:

“a difficult spatial situation as several green spaces (stepping stones) have been separated from each other by residential and industrial development.

These spaces include Rathcoole Park, Citywest Golf Club and smaller pockets of green space at Citywest Business Campus and the Brookfield residential area.

We encourage the Council not to exacerbate the spatial situation by the possible separation of Rathcoole Woodlands from Rathcoole Park and the splitting of the rewilded area into 2 components, East and West of the proposed Res – N zoning.