

## BCM Submission

With reference to:

Chapter/ Section	<b>Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town – Rathcoole</b>
Amendment ref.	<b>Amendment 2.13</b>
Page no.	73
Policy/Objective No.	New - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map 07 and 08
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.13 View Consequential Amendments <a href="#">[PDF]</a>

And the proposed New CS10 Objective 4, CS10 SLO1 and CS10 SLO2 to be added to read:

**CS10 Objective 4: To facilitate the delivery of new residential development in coordinated manner, ensuring alignment with investment infrastructure and supporting amenities and services. Such measures shall be delivered through appropriate phasing in line with CS10 SLO1 and SLO2.**

**CS10 SLO1 to be inserted on the lands adjacent to Rathcoole Park: To ensure that 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.**

**CS10 SLO2 to be inserted on lands to the west of Rathcoole: To ensure the delivery of the necessary upgrades to the existing road to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site.**

And to the proposed rezoning:

Amend Maps No. 7 and No. 8 revising the zoning as indicated in the maps below

From RES N New Residential to RU Rural,

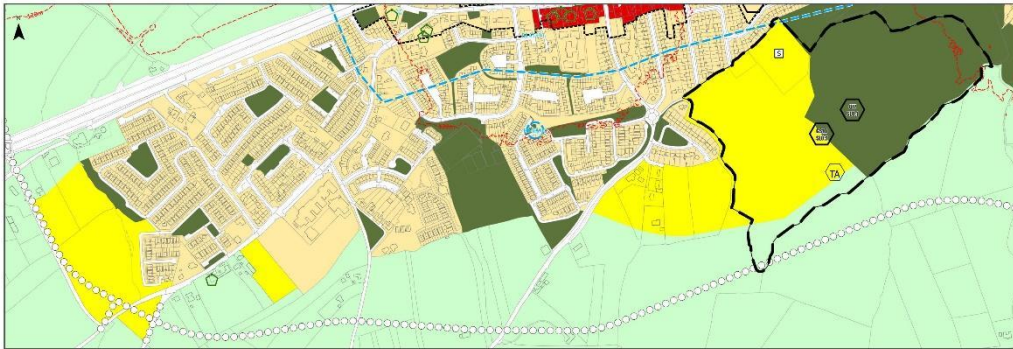
from OS Open Space to RU Rural,

from OS Open Space to RES-N New Residential on lands adjacent to Rathcoole Park to the southeast of Rathcoole and removing the boundary of CS10 SLO1,

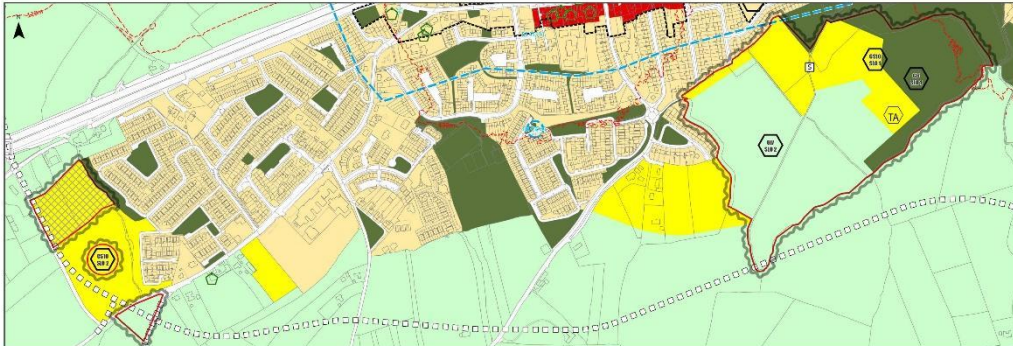
Adjusting the location of the school site and Traveller Accommodation map based objectives to reflect CS10 Objective 4, new CS10 SLO1 and CS10 SLO2.

Amend the zoning to the west of Rathcoole from Res-N to Strategic Residential Reserve Lands and from RES-N New Residential to RU Rural.

Proposed Amendment Ref: 2.13



Draft Plan as Published



Proposed Amendment: Various amendments to land use zoning and objectives (see text for details)

The figure below is presented to give an idea of how the proposed zoning sits over the rewilded area.



Figure 1 Rewilding area outlined with proposed zoning indicated.

# 1 New CS10 Objective

The BCM Residents Association, Rathcoole welcomes the opportunity to participate in the Public Consultation<sup>1</sup> on the Material Alterations to the Draft County Development Plan. In particular the Group welcomes the opportunity to comment on and query reports supporting the proposed material alteration, **CS10 SLO1**, the associated zoning and mapping and the objective itself.

We note the following clause

**CS10 SLO1 to be inserted on the lands adjacent to Rathcoole Park:**

**To ensure that 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.**

**We ask that above proposed insertion is replaced with the following:**

**CS10 SLO1 to be inserted on the lands adjacent to Rathcoole Park:**

**To ensure that the lands adjacent to Rathcoole Park are preserved “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”**

**Negative construction impacts should be avoided that affect the hydrology and ecology of the area. These lands should be zoned appropriately to ensure preservation.**

## **Ecological Report reference**

The very thorough report completed by Faith Wilson Ecological Consultants, commissioned by SDCC, is extremely important and its “ASSESSMENT OF SIGNIFICANCE” section on pages 52/53 reprinted below drives the above insertion proposal to CS10

<https://www.sdcc.ie/en/devplan2022/stage-2-draft-plan/chief-executives-report-on-the-draft-plan-public-consultation/appendix-2b-rathcoole-lands-ecology-report.pdf>

## **Key sentences**

“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

Rathcoole Lands is of County importance.

It contains Annex I Habitats along with species rich areas and “ Negative impacts must be avoided”

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<sup>1</sup>



## 5. ASSESSMENT OF SIGNIFICANCE

The site is of importance from the perspective of both flora and fauna. This ecological assessment of lands at Rathcoole, Co. Dublin has identified these lands as being of county importance in terms of the habitats, flora and fauna they currently support.

### Flora and Habitats

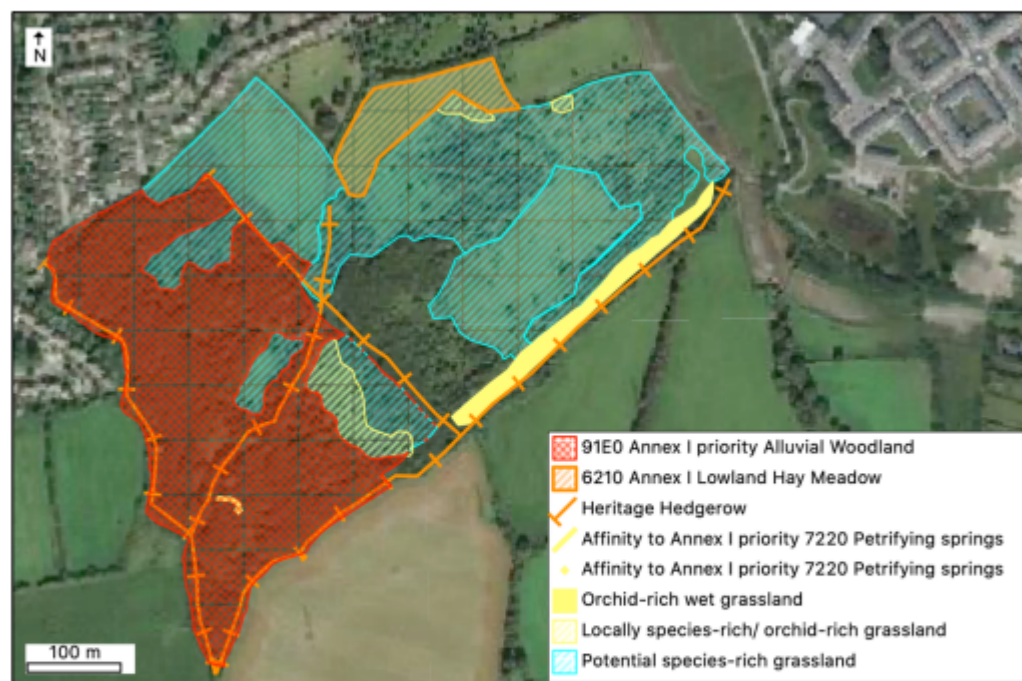
The main interest in the site in terms of flora and habitats is summarised in **Table 5.1** and shown on **Figure 5.1.1**. This shows the areas which are of particular ecological importance as they either support Annex I (priority) habitat, have affinity to an Annex I habitat, are species-rich examples of a habitat type or are of heritage value (hedgerows).

**Table 5.1. Summary of Habitats of High Ecological Importance at Rathcoole.**

Habitat	Ecological importance	Reason for evaluation
Calcareous springs (FP1)	Local (higher) ecological importance	Wetland with affinity to Annex I habitat 'Petrifying springs' [7220]
Dry meadows and grassy verges (GS2)	County ecological importance	Species-rich and orchid-rich grassland which is an example of the Annex I habitat 'Lowland Hay Meadows' [6510].  Only 2 <sup>nd</sup> site for this habitat in South Dublin.
Dry meadows and grassy verges (GS2)	Local (higher) ecological importance	Species-rich and orchid-rich areas of grassland (non-Annex)
Wet grassland (GS4)	Local (higher) ecological importance	Species-rich and orchid-rich wetland
Wet willow-alder-ash woodland (WN6)	County to national ecological importance	Example of Annex I priority habitat 'Alluvial woodland' [91E0].  Only 2 <sup>nd</sup> site for this habitat in South Dublin and only site in 10km square O02.
Hedgerows (WL1)	County ecological importance	Highlighted hedgerows are considered 'Heritage Hedgerows'

The **South Dublin County Council Development Plan (2016-2022)** states that: *'A number of habitats and species listed in Annex I and Annex 2 of the Habitats Directive are known to occur at locations in the County which are situated outside of protected sites. Under the EU Habitats Directive, protection is afforded to these species and habitats where they occur.'* Protection of these habitats and avoidance of negative impacts from development are included in the Heritage, Conservation and Landscape (HCL) Policy 15 for Non-Designated Areas Objectives 1 and 2. For non-Annex I habitats, HCL15 Objective 3 is 'To

protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value....'.



**Figure 5.1.1. Habitats of national, county and high local ecological importance within the project area.**

Red = county to national ecological importance

Amber = county ecological importance

Yellow = at least local (higher) ecological importance

Blue = local (higher) ecological importance or higher, with appropriate grassland management.

In addition to the Annex I habitats and non-Annex trees, hedgerows and woodlands, it is also important to note that much of the grassland on the site currently only has low to moderate species-richness through lack of management (blue hatched areas on **Figure 5.1.1**). These areas support a number of Annex I lowland hay meadow indicator species (see **Section 3.1.1**). With correct management, it is likely that much of the grassland on the site would have affinity to Annex I lowland hay meadow (potential County ecological importance).

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.

### **Fauna**

The lands are used by a diverse variety of fauna and provide a locally important habitat for badgers, deer, rabbits, foxes, five species of bats and a rich diversity of birds in terms of cover for hunting and foraging as well as breeding habitat. Common pipistrelle, Soprano pipistrelle, Leisler's bat, Brown long-eared bat and an unidentified *Myotis* sp. were recorded utilising the site for foraging purposes. No bat roosts were confirmed but a number of potential roosts in trees have been identified.