



Our Ref: FP2021/049
(Please quote in all related correspondence)

26 April, 2022

Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
South Dublin County Council
County Hall,
Tallaght,
Dublin 24

Via WebPortal: <https://consult.sdublincoco.ie>

Proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028

A chara

The Department refers to the correspondence received with respect to the above referenced proposed material amendments to the Draft County Development Plan 2022-2028.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

In this Department's submission on the original Draft of South Dublin County Development Plan 2022-2028 recommendations were made in relation to the content of certain sections of text. These included comments on the first paragraph of the part of *Section 3.3 of Chapter 3: Natural, Cultural and Built Heritage*, which deals with the Protection of Habitats and Species Outside of Designated Areas. It was suggested that a sentence of this paragraph should be rewritten to reflect the full legal protection afforded wild birds. The alterations to the text of this paragraph now proposed refers to all wild bird species being protected under Wildlife Acts, 1972 to 2018, as requested, but text of this paragraph as altered is overall very confusing with regards to the protection, or lack of it, afforded various species and habitats. It is suggested this situation might be clearer if this paragraph read as follows:

The County supports a range of flora and fauna and their habitats which are not protected under European or Irish legislation. In other cases, whilst the species themselves are protected, such as in the case of all wild bird species and many mammal species under Wildlife Acts, 1972 to 2018, their habitats are not. The habitats of rare species in particular have an important natural heritage and ecological value for the County and should be protected. Such species include rare plants listed in the Red Data Lists of Irish Plants and



especially those covered by the Flora Protection Order, 2015, (or other such orders). All bat species and the otter are subject to a system of strict protection under the European Habitats Directive (92/43/EEC), which includes protection of their resting and breeding places, and it would be desirable where possible to protect their foraging habitats as well.

With regards to proposed *Amendment 7.21 to Section 7.7.2 New Street and Road Proposals of Chapter 7 Sustainable Movement*, to: *Amend description and function in Table 7.5 Six Year Road programme relating to the Western Dublin Orbital Route*, this Department wishes to draw South Dublin County Council's attention to its original comments regarding the mention of this road in Table 7.5:

"On a larger scale the Six Year Road Proposal for a "New road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered" will cut through the wildlife corridor along the rural fringe of South Dublin County adjacent to the Kildare border identified in Chapter 4 of the draft CDP as a significant component of the county's green infrastructure. This 'Western Dublin Orbital Route' could also threaten the Liffey Valley pNHA as it is not clear from the road proposal that the perceived need to link it across the Liffey to the M3 in Fingal might not lead to the routing of such a road connection through privately owned woodland in Lucan demesne townland that is included within the pNHA. While the Western Dublin Orbital Route in this chapter of the draft CDP is proposed to be constructed within six years, this route is shown as a long term road proposal on the relevant draft CDP maps of the areas it is to traverse.

Detailed assessments of the possible ecological impacts of the above road proposals will therefore be required and appropriate measures identified to mitigate their potential effects on flora and fauna. In the case of the Western Dublin Orbital Route for instance, some of the lands owned by the County Council adjacent to the Grand Canal and west of the proposed route of this new road along the western boundary of the Grange Castle West Business Park could be dedicated to nature conservation purposes to compensate for the impacts the road will have on local biodiversity."

In this context, it is consequently recommended, that the Grand Canal pNHA should be mentioned in the last sentence of the amendment amongst the environmentally sensitive areas which it will be a primary objective of South Dublin County Council to protect.

You are requested to send any further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie, or to the address on the cover page.

Is mise le meas,



Michael Murphy,
Development Applications Unit