

Uimhir Thagarta Uathúil: FIN-C453-1081

Údar: Sarah-Jane Cullinane

Stádas: Submitted

Aighneacht:

Sustainable Skerries submission to the Draft FDP May 2022

Comhairliúchán:

Draft Fingal County Development Plan 2023-2029

Chapter 9: Green Infrastructure and Natural Heritage

Caibidil: Section 1: Written Statement » Chapter 9: Green Infrastructure and Natural Herit...

1) Pesticide and Herbicides use

9.6; Objective GINHO29 Biodiversity and Open Space

Ensure that the management of the Council's open spaces and parks is pollinator-friendly, provides more opportunities for biodiversity, and is carried out without the use of pesticides where possible.

In the whole document there is only one mention made of pesticide use (or non-use). This is of course to be applauded because pesticides kill not just the insects that they are targeted at but all insects, including those widely known to be beneficial such as pollinators, and others that have their own vital but largely unappreciated roles in the ecosystem. However no mention is made at all about herbicide use (or non-use). There has always been a general perception that because herbicides are used to control plants they do not harm insects. This is not the case. An insect coming into contact with freshly sprayed flowers or foliage will definitely be affected and likely die. Not only that but residues can and do persist within the plants and soil and have a propensity for entering watercourses. This is not to mention the effect on human health. A similar **commitment to cease the use of herbicides on open parks and spaces** would be welcomed. It also might be possible for Fingal to bring its influence to bear on other organizations and businesses occupying Council land.

2. Biodiversity Net Gain Guidance

9.6; Policy GINHP14 Biodiversity Net Gain Guidance

Promote biodiversity net gain in new developments and develop a planning guidance document on Biodiversity Net Gain.

This will only be effective if the policy is adequately enforced. Sadly, in many instances in the past this does not appear to have been the case, with developers getting away in numerous cases with reduced or watered down actions thus effectively reneging on their commitments. Development of the guidance should include **measurable targets for net gain and any proposals for offsetting rules must be very carefully considered**. In line with the mitigation hierarchy any developer must be incentivised to avoid or reduce impacts in the first instance, and must be able to demonstrate that all options have been explored before any offsetting arrangement can be agreed. Compensation for lost habitat must be delivered at the local scale in order for communities such as Skerries to continue to deliver upon our biodiversity objectives.

Planting guidance for new developments would be welcomed, be it in schools, apartment complexes, housing estates or commercial premises. As things stand these types of development are invariably landscaped or planted predominately with low maintenance non-native shrubs which only need trimming once a year and have little or no biodiversity value. A more **environmentally planting regime** should be encouraged from the start. An example of where this approach has succeeded in the past is the Lusk National School which, when major expansion works were carried out a few years ago, resisted this style of planting in favour of an ecologically beneficial approach.

3. Reduced Mowing Regimes

9.4 Strategic Aims; RPO 7.17 *The European Union Biodiversity Strategy 2030 contains specific commitments..... The Commission calls on European cities of at least 20,000 inhabitants to [...] limit excessive mowing of urban green spaces and other biodiversity harmful practices.*

While it is very encouraging to see that in practice and Fingal are indeed adopting reduced mowing regimes, there appears to be no mention of this in the Draft Plan. Delaying mowing of roadside verges and underused corners of open space along with reduced mowing of wider areas also has very significant environmental benefit along with reduced operating costs and should be considered a win-win situation. There will of course be resistance from some members of the public, but attitudes are changing fast and any such resistance must be resisted. The plan should explicitly **include details of reduced mowing regimes and how they will be communicated and implemented**.

4. Ecological Impact Studies prior to Development

9.5.1.1 Biodiversity Objective GINHO4 Green Infrastructure and Development

Resist development that would fragment or prejudice the County's strategic Green Infrastructure network.

Careful consideration should be given before development is allowed on so-called "waste areas" which are often in fact valuable ecological resources. A case in point is the Ballast Pit in Skerries which has so far escaped development on several occasions. The floral community in less-disturbed areas aligns closely with Annex I habitat 6210 (Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) and would have the potential to be restored as such. The Ballast Pit site in Skerries has yielded records of over 70 species of native bee out of a total of some 100 (honey, bumblebee and solitary Bee) and is known to currently contain one threatened bumblebee, one endangered butterfly, viviparous lizards and the rare pyramidal orchid.

We note and welcome the fact that FCC propose to rezone the Ballast Pit to 'open space', a move that will afford it enhanced protection. However, this would still allow leeway to improve the changing facilities on the football pitch, currently a shipping container, and perhaps replace it with a permanent structure. Should this be proposed a **full and appropriate ecological impact study** should be carried out in order to minimise the impact on this valuable and sensitive area. The FDP should include such provisions to any development in these areas.

5. Definition of Rewilding

Objective GINHO26 Rewilding

Continue to promote and support re-wilding and pollinator initiatives within the County.

Is it clear to the public what is meant with the use of the term 'rewilding'? The definition of rewilding provided in Section 9.5.2 probably means little to the layperson, and in general the term can be sometimes be unhelpful by triggering quite polarising debates as it is often associated with land abandonment or introduction of predators. A **more practical definition of rewilding**, in the context of Fingal and its habitats would facilitate transparent tracking of progress against this objective. It is important that the plan **clearly identifies the urgent need for the ecologically-appropriate creation, restoration and enhancement of natural local habitats** such as species-rich grassland, woodland, healthy hedgerows and small wetlands, on both on public and private lands, and clearly highlights these are actions that can be implemented at a multitude of scales and are not limited to large scale developments or conservation programmes.

6. Woodland for Non-Recreational Purposes and Private Land

Objective GINHO45 Woodland Development Schemes

Promote, encourage and support woodland development schemes by identifying suitable areas and support other initiatives that aim to establish and enhance woodlands for recreational purposes in partnership with local communities.

The **establishment and enhancement of woodlands for non-recreational purposes** such as climate mitigation, water regulation and biodiversity should also form part of this scheme. Any proposals must be considered in the context of earlier comments on climate action so the carbon losses and gains over-time, and ecological consequences of habitat change, are fully understood i.e. putting the right tree in the right place. As well as opportunities on public lands, the use of the **native woodland scheme for private landowners**, for which there is very poor uptake in Fingal relative to other counties, should be promoted and encouraged.

7. Protection of Trees and Hedgerows

Policy GINHP21 Protection of Trees and Hedgerows

Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.

Past developments have failed dismally to protect long-established trees and hedgerows which are consistently ripped out in favour of fencing. Developers are reluctant to work around woody vegetation as it constrains open movement on construction sites and they would prefer to have a 'clear working area' and re-plant, yet these new trees go nowhere close to compensating for lost mature habitats, and developers need to become accustomed to working around trees and tree roots for which there are well-established standards and methods. Underground infrastructure should also not be used as an excuse for wide wayleaves requiring tree removal. Pipelines can be adequately protected with root barrier membranes and any felled trees immediately above pipelines can be planted with shallow

lateral-rooting trees such as hazel or native shrubs such as blackthorn. 'Proper provision for their protection and management' therefore must **include clear and measurable standards for developers**, with the onus on developers to prove that there is no alternative to removal, or demonstrate why standard tree-protection measures could not be implemented. Any compensatory planting must be of a significant scale to account for the relative maturity of what has been lost. It is highlighted that to achieve Biodiversity Net Gain this will become a necessity.

8. Species Protection and Ecological Assessments

Policy GINHP18 Species Protection & Objective GINHO40 Ecological Assessments

It is noted that ecological impact assessment is only referenced as a requirement where a development might impact rare and protected species or their habitats, or interfere with an ecological corridor. As an absolute minimum, **a preliminary ecological appraisal should be required in the case of any development**. Without an ecologist visiting a site, it cannot be clearly deduced what the impacts may be as available desktop data is patchy and skewed toward certain species. Opportunities to identify ecological enhancement options for many developments would also be missed. Furthermore, many species, particularly insect groups, are poorly recorded, provided little protection under law, and we are consequently losing opportunities to preserve and restore their habitats. In the current 'biodiversity emergency' there is an urgency to ensure these opportunities are not missed. Ecological appraisal of all developments has been standard in the UK for many years and Fingal have an opportunity to promote and establish a minimum standard through this development plan. There is clear and standardised guidance provided by CIEEM, the professional body for Irish and UK ecologists, on preliminary ecological appraisal. It is further noted that Biodiversity Net Gain for developments would need to be underpinned by such an appraisal for it to be meaningful.

Documents Attached: Níl