



Planning Ref: FP2022-065
(Please quote in all related correspondence)

21 December 2022

Director of Services – Planning
Fingal County Council
County Hall
Main Street,
Swords
County Dublin
K67 X8Y2

Re: Notification under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

Proposed Development: Public Consultation on the Material Alterations for Fingal Development Plan 2023-2029

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

Having considered the Material Alterations to the Draft Fingal County Development Plan 2023-2029 put forward by the County Council the proposed amendments considered by this Department to of significance from a nature conservation perspective are commented on below in the order in which they appear in the relevant Chapter of the Draft Development Plan:

Chapter 2: Planning for Growth—Core Strategy, Settlement Strategy PA CH 2.20: Section 2.7.2 Role of Each Settlement, page 74

Amend Policy CSP24 – Liffey Valley SAAO as follows:

Protect the Liffey Valley Special Amenity Area Orders (SAAO), from residential and industrial development intended to meet urban generated demand.

The Liffey Valley, including areas in the vicinity of the lands covered by the SAAO as well the area which is actually the subject of this order, is of a very high value for biodiversity and encompasses ancient woodlands as well other habitats in which a number of plant species

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

Newtown Road, Wexford, County Wexford, Y35 AP90



listed in the Irish Red Data Book 1 Vascular Plants (T.G.F. Curtis & H.N. McGough, 1988,. Wildlife Service Ireland) occur, including hairy St. John's wort *Hypericum hirsutum* protected under the Flora (Protection) Order 2022 (S.I No. 235 of 2022). There is also a rich fauna present including otter and bat species which are afforded a system of strict protection under the Habitats Directive (92/43/EEC). This Department therefore has concerns about any proposed modification to the County Development Plan (CDP) such as the above planning amendment which might result in increased development in the Liffey Valley that could potentially have adverse effects on the valley's flora and fauna, and its function as a ecological corridor lying astride the River Liffey between built-up areas in Fingal and South County Dublin.

Chapter 6: Connectivity and Movement

PA CH 6.18: Section 6.5.10 Road Network, page 231

Amend Objective 37c as follows:

Support and facilitate the TII, NTA, Meath County Council and Kildare County Council in the planning and delivery of a new link between the M3 and M4. ***Any such link must not run through the suburban areas of Fingal, Liffey Valley SAAO or St. Catherine's Park***

Again, because of the high biodiversity value of the Liffey Valley, as outlined above, this Department has concerns about any development proposal, such as the construction of a road link between the M3 and M4 referred to in the above proposed amendment, which might adversely affect the valley's flora and fauna and especially the woodland obligate species present in St. Catherine's Wood and other areas of ancient woodland occurring in the Liffey Valley and hardly found elsewhere outside this valley in County Dublin. That the proposed road link between the M3 and M4 will not be routed through lands subject to the Liffey Valley SAAO or St. Catherine's Park is consequently warmly welcomed by this Department.

Chapter 9: Green Infrastructure and Natural Heritage

A CH 9.8: Section 9.6.8 Ecological Corridors and Stepping Stones Including Trees and Hedgerows, page 334

Include a new Objective after Objective GINHO41, as follows:

Objective GINHOXX – Protection of Royal Canal

Protect the Royal Canal and associated habitats along its banks as a proposed Natural Heritage Area by establishing an ecological corridor free of new housing development with a buffer consisting of a minimum width of 30 metres from the top of each bank of the Canal.

This Department strongly supports the above proposed amendment as the maintenance of the buffer zone along the Royal Canal promoted in it should aid the conservation of the flora and fauna associated with the Royal Canal proposed Natural Heritage Area (pNHA) and the function of this area as ecological corridor facilitating the movement of plant and animal species.



A CH 9.11: Section 9.6.8. Ecological Corridors and Steeping Stones including Trees and Hedgerows, page 334

Include a new objective to Section 9.6.8. as follows:

Objective GINHOXX – Streamside Riparian Zone

Remove existing revetments and/or gabion baskets along river and streams and restore a minimum of 10m of natural streamside riparian zone, where possible. If existing hard bank structures cannot be removed, provide instream river rehabilitation works in consultation with Inland Fisheries Ireland to improve the overall habitat quality of the river.

PA CH 9.12: Section 9.6.8. Ecological Corridors and Steeping Stones including Trees and Hedgerows, page 334

Include a new objective to Section 9.6.8. as follows:

Objective GINHOXX – Setback of New Surface Water Drainage Outfalls

Set back new surface water drainage outfalls from the main river channel on the landward edge of the floodplain or a designed wetland feature to cater for water quality improvement before the surface discharges into the river.

This Department welcomes the above proposed amendments to the Draft CDP which provide for measures which should contribute to enhancing water quality in Fingal's water courses, preserving riparian zones along such streams and rivers and maintaining their value as wildlife corridors.

PA CH 9.18: Section 9.6.16 , Special Amenity Areas, page 342

Amend objective GINHO62 Liffey Valley Regional Park Study as follows:

To carry out a study for the lands that comprise Liffey Valley inclusive of the Special Area Amenity Order (SAAO), Shackletons Mill and adjacent lands so as to investigate and determine viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park) **including a Greenway (Liffey Valley Greenway)**, with particular emphasis on enhancing the recreation, amenity value and accessibility of the area, in accordance with the Council's published document Towards a Liffey Valley Park (2007). This new Regional Park will serve the needs of existing communities of Clonsilla, Hansfield and Ongar as well as the wider Greater Dublin area. The study will be carried out in consultation with the surrounding Local Authorities, State Agencies, existing landowners, sectoral, community and commercial interests.

Given the high biodiversity value of the Liffey valley as outlined in the above observations in relation to proposed amendments to Chapters 2 and 6 of the Draft CDP, this Department would have concerns about the incorporation of a greenway in the proposal for a Liffey Valley Regional Park. The construction of greenways /cycleways elsewhere in Dublin City and County in recent years, such as along the River Dodder, Grand and Royal Canal has resulted adverse impacts on flora, fauna and riparian habitats. If any plan for a Liffey Greenway is brought forward, it should therefore include provision for avoiding lands supporting rare plant species or any increase in disturbance to areas containing the breeding or resting places of otter, a species which is subject to a system of strict protection under the Habitats Directive (92/43/EEC) and not include the installation of artificial lighting which might adversely affect bat species similarly protected under the Habitats Directive.



PA CH 9.19: Section 9.6.7 High Amenity Zoning, page 342

Amend Objective GINHO59 as follows:

Consider Prioritise Rogerstown, Malahide and Baldoyle Estuaries for Special Amenity Area Orders

This Department welcomes the aim of the above planning amendment of prioritizing the making of Special Amenity Area Orders covering these estuaries which are designated as Special areas of Conservation (SACs) under the Habitats Directive (92/43/EEC) or Special Protection Areas (SPAs) under the Birds Directive (2009/147 EC) as the making of such orders should aid the conservation of these European sites and the habitats, flora and fauna they have been designated to protect.

Chapter 14:

PA CH 14.16: Section 14.18.2.4 Ecological Corridors and Stepping Stones Including Trees and Hedgerows, page 596

Include a new objective to follow DMSO156, as follows:

Objective DMSOXX – Ecological Corridors in Urban Areas

Any redevelopment of existing properties and brownfield sites within 25m from each riverbank along the main channels of following rivers Liffey, Tolka, Pinkeen, Mayne, Sluice, Ward, Broadmeadow, Ballyboghil, Corduff, Matt and Delvin, Bracken River, Daws River, Richardstown River, Turvey River shall provide opportunities for multi-functional green infrastructure, including features which intercept and filter surface water from the site before discharging into the river. These features include, but are not limited to: green roofs, reinforced grass parking bays and water gardens. The use of underground attenuation as part of the redevelopment of existing properties or brownfield sites will not be accepted.

This Department strongly supports the aim of the above planning amendment to maintain and enhance ecological corridors along water courses in Fingal.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager@npws.gov.ie where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas



A handwritten signature in purple ink, reading "Simon Dolan", positioned above a horizontal line.

Simon Dolan
Development Applications Unit
Administration