



Planning Ref: ABP-313145-22
(Please quote in all related correspondence)

29th April 22

The Strategic Housing Unit
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: strategichousing@pleanala.ie

Re: Notification under the Planning and Development (Housing) and Residential Tenancies Act 2016; Planning and Development (Strategic Housing Development) Regulations 2017

Proposed Development: SHD application 609 no. residential units and associated site works in the townland of Boherboy, Saggart Road, Co. Dublin.

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 documentation supporting this SHD application, it is noted the development site consists of 18.6 ha of agricultural land in the townland of Boherboy south of the Embankment to Saggart road. On its eastern and northern sides the site is bounded by the Corbally Stream, which also demarcates the boundary between the townlands of Boherboy and Corbally. Hedgerows are present along the Corbally Stream, on the southern road-side boundary of the site, and running north-south along the central spine of the site dividing it into two sections. Circa 550 m of hedgerow are to be removed to facilitate the proposed development including the road side. The loss of this hedgerow is to be regretted as roadside hedgerows often display greater diversity than other hedgerows (except for townland boundaries) probably because they are usually older than the internal hedgerows within land holdings. On the other hand it is noted and welcomed that a riparian strip is to be preserved within the proposed development along the Corbally Stream, and that the central spine hedgerow on the site is also to be retained.

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



It is also noted that 24 bird species were recorded on the site during a breeding season survey which typically nest in trees, shrubs and hedgerows. The clearance of the hedgerows and trees from the site required to facilitate the proposed development during the main bird breeding season from March to August could lead to the destruction of nests, eggs and nestlings.

Bat activity surveys of the site recorded located no bat roosts, but five species of bats were identified foraging over the site, common and soprano pipistrelles, Leisler's bat, long-eared bat and a species of the genus *Myotis*. Both long-eared bat and *Myotis* species are considered sensitive to light. Because of the presence of this bat fauna, in order to minimise the impact of the development of the site and maintain usage of it by bats, the proposed lighting scheme is to be designed to be bat friendly. Lighting will be directed away from retained trees and shrubs, and bats should in addition benefit from the new tree planting which is to be undertaken, especially the planting proposed along the Corbally Stream corridor.

Some habitat, particularly parts of the wet ditch traversing the centre of the site adjacent to the spine hedgerow, is considered suitable for use by frogs and smooth newts for breeding. If works on the site are scheduled for a period of the year when spawn or tadpoles are likely to be present, it is proposed to survey for these stages of the frog and newt life cycle and remove them. However, there is no provision in the development proposals for the inclusion of a pond or other water body in the landscaping of the scheme which could provide a suitable future breeding location for these amphibian species in the long term, and to which any spawn or tadpoles could be transferred to.

Recommendations:

In the light of all of the above it is recommended that the Board should consider, in order to preserve biodiversity as far as possible making it a condition of any planning permission granted in response to the present SHD application that the proposed landscaping of the Saggart Road boundary of the development site is modified to retain the hedgerow currently existing on this boundary of the site by constructing the footpath proposed to be built along the road to the rear of the hedgerow.

In any case conditions on the following lines should certainly be attached to any planning permission granted for the development proposed:

1. That clearance of vegetation from the development site shall only be carried out between September and February ie. outside the main bird breeding season

Reason: to avoid the destruction of bird nests, eggs and nestlings.

2. That a finalised external and internal lighting design scheme for the proposed development signed off on by a bat specialist shall be submitted to the planning authority for their written agreement before the commencement of development on site, and shall be implemented in full.

Reason: To conserve bat species which are afforded a regime of strict protection under the Habitats Directive (92/43/EEC).



3. That pond or ponds shall be incorporated into the landscaping of the proposed development and constructed before the commencement of the main development works, to which any frogs, smooth newts, their spawn or tadpoles located on the development site shall be transferred to under licence from the National Parks and Wildlife Service, these water features to maintained indefinitely.

Reason: To conserve any amphibian populations present on the development site.

Archaeology

With regard to the above proposed development the Department has reviewed the archaeological assessment report that was submitted with the application.

The archaeological assessment was carried out by John Purcell, dated March 2018, and included the result of a desk based assessment and the results of archaeological test excavations carried out under licence 18E0246. Nothing of archaeological significance was found on the site of the proposed development. The assessment recommends that no further archaeological investigation is warranted.

The Department concurs with the recommendations in the report and does not have any further archaeological requirements in respect of the proposed development.

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

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

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A handwritten signature in blue ink, which appears to read "Simon Dolan", is written over a horizontal line.

Simon Dolan
Development Applications Unit



Administration