

Subject: FW: RE: SD22A/0312 - Proposal for a Lidl on Newcastle Main Street.

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Hi Conor,

I have reviewed the ecological and landscaping information submitted with this application and I request further information based on the following comments:

Ecology

In general, it is considered that the submitted EclA underestimates the significance of biodiversity on the site, particularly in the context of potential cumulative impact on ecology in Newcastle. While the Ecological Impact Assessment lists the relevant pertinent surrounding developments and plans, the report fails to adequately assess the actual cumulative impact on the ecology of the wider area arising from the cumulative impact from these developments.

The current application proposes to remove almost all of the vegetation on the site, replacing it with extensive built environment. While the proposal includes for rain garden locations, very little replacement landscaping is proposed across the site, and that which is proposed will require time to mature to a point where it can support biodiversity.

The finding of the scarce plant *Anthyllis vulneraria* on site indicates the presence of an interesting soil type which could support species-rich grassland if managed appropriately. The re-use of this soil in an improved landscaping plan for the proposed development is advised.

The cumulative impact on ecology on this site and in this area of Newcastle is therefore not insignificant, and it has been under-assessed in this submission. No proposals for appropriate mitigation for this loss have been proposed in the material submitted.

A Green Infrastructure Plan is required to address this.

Bats

Bats, in particular, are an important protected species in the broader area of Newcastle. The Ecological Impact Assessment Report (EclA) report as submitted is incorrect to state that the proposed development is not in proximity to sensitive bat locations. The village of Newcastle is a known site of importance for bats and, in particular, bat roosts.

The application site is situated directly across the road from Oakville House, a known bat roost. Also, the installation of bat boxes was required as a condition of planning for the nearby St. Finian's school. One of these bat boxes was inhabited by bats shortly after the completion of construction.

Bats are known to commute along linear landscape features such as hedgerows and tree lines. It appears that only a single dusk/emergence survey for bats was undertaken as part of this submission. This is considered to be insufficient survey effort to adequately assess bat usage of this site, particularly as it is in close proximity to known bat roosts. A more robust assessment of potential impact on local bat populations is required.

SuDS

The EclA and the overall application as proposed fails to recognise the value of the ditch/watercourse and the active spring in the context of mitigation for other proposed biodiversity losses on the site. An opportunity is presented to

enhance the watercourse and to up-lift the section of the pipe in the northern portion of the western boundary to facilitate an open watercourse which could form part of an overall Green Infrastructure Plan for the site.

In the context of the above, **Further Information** is requested on the following:

The applicant is requested to prepare a Green Infrastructure Plan for the site. This Plan is to be prepared by a qualified and experienced ecologist in conjunction with a landscape design team with experience in green infrastructure landscape plans. The Plan is to:

- i) robustly evaluate the wider value of the biodiversity across the site, highlighting the retention and enhancement of existing features including, but not restricted to, the existing hedgerow, trees, the associated ditch/watercourse, and the active spring.
- ii) incorporate more extensive SuDS measures to address surface water management on site, and identify biodiversity benefits from these measures. Such SuDS measures are to include additional proposals for swales, green roofs and green or living walls, which will also assist in mitigating for the loss of biodiversity arising from the proposal
- iii) re-evaluate the impact on local bat populations in the context of known roosts in surrounding properties, and propose robust avoidance and mitigation measures for potential impacts on these protected species, including the removal or significant reduction of lighting along the western boundary.
- iv) propose alternative locations for, or the removal of, the proposed carparking spaces along the western boundary away from the line of the boundary hedge which is a burgage plot boundary of heritage and biodiversity significance.
- v) retain a dark corridor along the western site boundary to facilitate the movement of bats through the site
- vi) show the retention and enhancement of a riparian corridor along the western boundary of not less than 10m to provide a buffer to the wildlife corridor offered by this boundary
- vii) indicate how the GI in the GI Plan will link into adjacent sites in an overall GI Strategy for Newcastle
- viii) propose a revised landscaping plan where less soil area is sealed completely by development, and where the interesting soils of the site are appropriately reused and planted with suitable species so as to support greater ecological diversity across the site.

Regards,

Rosaleen.

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