

## MEMORANDUM

<b>To:</b>	<b>South Dublin County Council</b>	<b>From:</b>	<b>Enviroguide Consulting</b>
<b>Project:</b>	<b>Proposed Residential Development, Stoney Hill Road, Rathcoole, Co. Dublin</b>	<b>Date:</b>	<b>17/05/2023</b>
<b>Subject:</b>	<b>RFI response (Ref: SD22A/0347)</b>		

### Introduction

The Request for Further Information (SD22A/0347) issued on the 26<sup>th</sup> of October 2022 in relation to the proposed residential development (the 'Proposed Development') at Stoney Hill Road, Rathcoole, Co. Dublin (the 'Site'), requested the following information to be made available:

#### 10. Ecological Impact.

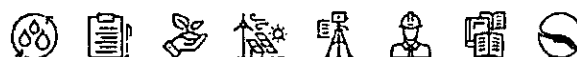
(a) The applicant is requested to provide an explanatory statement indicated how the development will comply with the proposed mitigation measures contained in the Ecological Impact Assessment, and showing consistency in the application particulars. In particular the applicant should show how the proposed public lighting would accord with the proposed measures for bat-friendly lighting in the EcIA.

(b) The applicant is requested to supplement the Ecological Impact Assessment with examination and analysis of potential impacts of (i) the proposed development and of (ii) the requested masterplan on the Rathcoole Woodlands.

### Response

#### In relation to point 10 (a):

Several mitigation measures relating to the protection of non-volant mammals, birds, bats and aquatic fauna during both the Construction and Operational Phase of the Proposed Development are outlined in Section 7 of the EcIA. This section also outlines the proposed habitat creation measures from the landscape plan particularly to the south of the Site. In addition, sections 4.8 to 4.11 of the Construction and Environmental Management Plan (CEMP) (DCON Safety Consultants) outline several measures/actions for the protection of local surface waters, aquatic species and biodiversity. In particular, the CEMP specifies the implementation of a Habitat Management Plan (HMP). This plan will detail how habitats will be retained, protected, and managed during the Phase 1 Construction Phase. In order to ensure that alleviation measures proposed in the HMP are complied with and to monitor the Construction Phase, ecological consultants will be appointed for the duration of the project



and for an appropriate period of time following completion. The main role of the project ecologist to ensure compliance will be as follows:

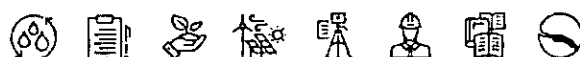
- Act as the primary on-site ecological contact for the implementation of the HMP.
- Ensure compliance with all recommendations of the HMP during regular site inspections.
- Request relevant records and documentation from the contractor where necessary.
- Attend routine meetings with the contractor.
- Keep detailed records of any ecological incidents and report these.
- Keep records of any variations to construction methods or design brief and modify HMP recommendations; and
- Produce the staged monitoring reports on flora and fauna as detailed in the Schedule of Reporting Requirements. The Project Ecologist will submit these to the Environmental Monitoring Officer (EMO). The Project Ecologist will also act as overall technical advisor to the project regarding implementation of the HMP actions.

The above will ensure compliance of all listed mitigation measures. In the event that any of the mitigation measures fail to meet requirements the local planning authority (LPA) will be informed by the Project Ecologist, an appropriate remediation plan will be designed and implemented by the developer until the desired outcomes are achieved.

The EclA outlined several potential measures to reduce or eliminate the impact of public lighting on bats including:

- Light spillage and glare will be minimised by utilising shielded, downward directed lighting and by using narrow spectrum lighting types with no UV or luminaire accessories.
- All non-essential lighting will be switched off during hours of darkness.
- The colour temperature of the lighting will be 3000K, with columns moved away from areas with bat activity.

The lighting design prepared by AECOM (drawing no: STNH-ACM-ZZ-00-DR-EL-021001) restricts public lighting to the internal roadways to the north of the Site. Lux contour modelling shows that there is minimal light spill as a result of the proposed design. Light spill in the vicinity of the internal roadways to the north of the Site is approximately 1 Lux which equates to the typical light levels at twilight (BCT, 2018). There will not be any illumination of the Rathcoole Woodlands, 170m to the east of the Site or any vegetative features which may be used by commuting bats. In addition, there will be no illumination of the landscaped areas (woodland, meadowland and SUDS ponds) to the south of the Site or the retained hedgerow which provides commuting and foraging linkages to the Rathcoole Woodlands. All non-essential lighting will be turned off during hours of darkness and all lighting will have a colour temperature of 3000°K. Further to the measures outlined in the EclA, if requested by the LPA, an Operational Phase light assessment can be undertaken with respect to the bats. Should light levels fail to meet proposed design levels or if light spill is found to occur on suitable foraging and commuting habitat, remedial action shall be undertaken as agreed with LPA, ecologist and developer.



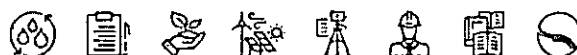
Therefore, it is not envisaged that the proposed public lighting plan will significantly or permanently impact the local bat populations.

In relation to point 10 (b)

The EclA submitted with this application provides a full analysis of the potential impacts of the Proposed Development on the local ecology. In addition, section 5.4.2 of the EclA also highlights the connectivity between the Site and the Rathcoole Woodlands, 170m to the east, by bats which were observed commuting and foraging along the hedgerow to the south east of the Site that links to the woodlands. This hedgerow was originally proposed to be removed with a residual negative, permanent, slight impact at a local scale, due to habitat fragmentation. However, this hedgerow is now being retained and coupled with the considerable woodland planting to occur to the south of the Site, the residual impact can be reduced to neutral and perhaps a slight positive, permanent impact at a local scale. Therefore, connectivity to the Rathcoole Woodland will be maintained. In addition, due to the sensitive lighting design, there will be no light spill in the direction of the Rathcoole woodlands or the foraging and commuting routes linking the Site to the Woodlands.

As the Rathcoole Woodlands is approximately 170m the east of the Site, coupled with the noise and dust suppression measures to be implemented during the Construction Phase, it is not considered that there will be significant impacts on this woodland during the Construction Phase. Similarly, due to the intervening distance and lighting plan, impacts as a result of light spill are deemed negligible. Although there is no direct right of way / access from the Site to the Rathcoole Woodlands during the Operational Phase, the woodlands can be accessed via the R120 and Coolamber Drive approximately 1km drive from the Site. There is potential that the residents will utilise Rathcoole Woodlands as an amenity space for exercise or dog walking. The possible increased footfall has the potential to lead to increased disturbance to flora and fauna within the woodlands. However, as the Proposed Development provides an area of woodland and amenity space to the south of the Site, it is likely that residents will utilise this area preferentially over Rathcoole Woodlands due to its close proximity. In addition, as Rathcoole Woodlands already appears to be utilised as an amenity space with several trails identified on satellite imagery, coupled with the relatively modest size of the Proposed Development (42 units), it is unlikely that any increased footfall would have a measurable impact on the biodiversity of Rathcoole Woodlands. However, if future further development occurs in the vicinity, there may be cumulative in-combination effects which may result in measurable impacts on woodland biodiversity.

In terms of the potential impacts of the proposed masterplan, it is noted that the area of land ownership where future development phases are proposed occurs on lands to the north and east of the Proposed Development which adjoins the Rathcoole Woodlands. Although finalised plans for these developments are not currently in place, it can be assumed that any future housing developments on these lands will encroach in the direction of the Rathcoole Woodlands. Progressive encroachment of human activities and development in the direction of this woodland is very likely to have significant negative impacts on the biodiversity, particularly to species which are sensitive to human presence, lighting and noise, (i.e., bats, mammals, birds etc). As outlined above, although there is no proposed direct access or right away to the Rathcoole Woodlands in the masterplan, in the event that no amenity space or



green infrastructure is provided within the masterplan, there may be significant cumulative increases in recreational footfall within Rathcoole Woodlands which could impact the biodiversity of the woodlands. Therefore, all future development within the area outlined by the masterplan will require robust ecological impact assessments including targeted surveys of species likely to utilise the woodlands (bats, birds, badger, otter etc). The results of these assessments will need to inform the design or redesign of future phases to avoid impacts to the woodlands and sensitive receptors. Opportunities for ecological enhancement within the proposed lands should also be explored with the aim of enhancing the ecological connectivity of these lands to the Rathcoole Woodlands. Ecologists should be engaged at the earliest possible stage to inform the design of future developments.

## References

**Bat Conservation Trust (2018)** Bats and artificial lighting in the UK- Bats and the Built Environment series- Guidance Note 08/18. Available at: <https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?v=1542109349>

