

Date: 28/09/23

Biodiversity Officer Response

Development: [Bus Connects Bray to City Centre](#)

Introduction

The move to a more sustainable transport system is welcome and very important, however it should be designed and managed so that it leaves biodiversity in a better state than before. Biodiversity underpins our resilience to climate change and that is why we have to consider the importance of the protection of biodiversity in all of our climate actions including sustainable modes of transport. Climate action should not be at a cost to biodiversity.

The Bray Scheme documents have been reviewed by DLR's Biodiversity Officer and following comments are provided:

1. Biodiversity Chapter 12 of EIAR

Desk Study does not contain any of the DLRC data held by the Biodiversity Officer, including Brent Geese, Otter, wildlife corridors etc and a meeting with the ecologists was requested by DLR's Biodiversity Officer during the preliminary meetings. Although requested in 2020 by DLR's Biodiversity Officer, no communication was received from the project ecologists to discuss the project in detail or to obtain the data that DLR were happy to provide.

Data such as:

- County Hedgerows surveys
- County Tufa Springs surveys
- County Otter survey
- Important Birds
- Riparian Birds
- Brent Geese data
- County Habitats
- Wildlife Corridors and the Ecological Network
- Rare Plants
- Pollinator sites

2. The Biodiversity Chapter notes:

12.3.3 Biodiversity Areas

Dún Laoghaire-Rathdown Biodiversity Action Plan 2021-2025 (DLRCC 2021) highlights a number of areas considered to be of biodiversity value present within the DLRCC administrative boundary.

There is no reference in this Chapter to the DLR Ecological Network contained within both the DLR County Development Plan and the DLR County Biodiversity Plan and/or the associated important biodiversity areas and connectivity, important wildlife corridors including treelines, hedgerows, watercourses and important habitats such as Annex habitats etc. It is unclear if the assessment used the DLR Ecological Network data as the basis for establishing the important biodiversity within the ZOI.

3. 12.3.5.12 Dry meadows and grassy verges (GS2)

Some of the meadows and pollinator sites are of Local Higher Value given their value for pollinators in an urban setting. See also point 8 below.

4. 12.3.5.16 Hedgerows (WL1)

It is unclear if the assessment and evaluation of hedgerows has taken into account the DLR Hedgerow Evaluations by Smith, 2020, JBA 2021 and 2022 and/ or if the hedgerows were evaluated as per Foulkes 2013. DLR Hedgerows are considered a significant part of our DLR Ecological Network and some of those are of County value. They provide connectivity across the urban landscape and it is envisaged that these will be enhanced and restored and should be considered in the Biodiversity Chapter. They also form part of the DLR Ecological Network.

It is also unclear as to what extent hedgerows are to be removed and as to what value each hedgerow may have. Providing an overall area is not sufficient in terms of detail, evaluation and assessment of individual hedgerows or stretches of hedgerow that will be lost.

It is requested that the detailed evaluation and assessment of the hedgerows that may be impacted by the proposed scheme is provided with reference to the County Development Plan and the DLR Ecological Network.

5. 12.3.5.17 Treelines (WL2)

Similarly, in relation to treelines and the ecological value of trees, insufficient information is provided in the Biodiversity Chapter and only an overall generalised assessment is provided. Some of the older treelines and their component trees are often of greater value for biodiversity in urban areas. It is noted that the arborist's report identifies various stages of maturity of the trees within the proposed scheme.

6. 12.3.5.19 Scrub (WS1)

Scrub can provide an important habitat for breeding birds and cover for important species such as badger. It offers connectivity and value to species along with a supporting function to other habitats especially in an urban environment. It is not considered at Local Lower value based upon species diversity, scrub by its very nature often is not diverse especially if it is closed and dense and greater diversity is more relevant to a very open stand or where it has more diverse edges/transition. I recommend an evaluation of Local Higher value.

7. 12.3.7 Non-native Invasive Plant Species

Winter Heliotrope has become a significant invasive alien species and the risk assessment for this IAS is due for review by the NBDC. How has this IAS been considered given it spreads easily in transport corridors and through soil movement. It is requested that the presence of Winter Heliotrope is checked along the route and if it is present that it is included in the Invasive Species Management Plan.

8. 12.3.13.4 Other Invertebrates

Please include all invertebrates and evaluate these at Local Higher Level as a minimum. Given the importance of pollinator sites including those areas of grassland managed for pollinators across DLR which have been shown to be of value to pollinators. Please see evidence in the recent TCD thesis and NBDC blog

<https://pollinators.ie/managing-urban-parks-for-pollinators-and-people/>

9. 12.4.3 Construction Phase - 12.4.3.1 Designated Areas for Nature Conservation

It is unclear if disturbance or displacement impacts to Otter during construction have been taken into account including noise, visual and other construction disturbances especially to areas of activity for otter. It does not appear in Section 12.4.3.1.1.5 Disturbance and Displacement Impacts.

10. 12.4.3.1.2.3 Habitat Degradation – Groundwater

The potential for impacts on Groundwater dependent terrestrial ecosystems do not appear to be considered sufficiently for the Loughlinstown Woods pNHA which contains EU alluvial woodland and the assessment has not demonstrated an understanding of the hydrogeology relevant to this pNHA including the groundwater catchment. No details are given of any potential drawdown and drawdown appears to be considered relative to the pNHA boundary rather than the groundwater catchment supporting the pNHA that may occur beyond that boundary. This requires a hydrogeological assessment and quantification of impacts on water flows and groundwater, if any due to excavations.

It is also requested that any other groundwater dependent habitats within the Zone of Influence will be identified by a suitably qualified hydrogeologist will also be assessed with input from a suitably qualified ecologist relative to any potential impacts that may arise.

11. 12.4.3.4.2 Badger

The language regarding survey for badgers is unclear, it is difficult to ascertain if surveys by a mammal specialist and following best practice surveys for badgers was completed. Confirmation is needed as to what mammal surveys were completed and to what standards and discussed with DLR's Biodiversity Officer. If the surveys were not sufficient then these surveys need to be completed.

It is also noted that as the Biodiversity Chapter states:

As the majority of the proposed location of Construction Compound BR1 site is composed of scrub largely surrounded by built wall with road frontage on three

sides, it is not considered to be an important area for commuting / foraging badgers, and therefore its use as a Construction Compound will not have any significant effect on the local badger population.

It is unclear as to how this conclusion was drawn, and if the scrub checked for mammal activities, if it was it accessible for those checks, if trail cameras placed to assist the surveys of mammals etc. Clarity on how this conclusion was drawn is important. Badgers appear in all sorts of urban settings including car parks, roads, scrub etc.

It is unclear as to what is the local badger population and how that was established. How have the following conclusions been supported in terms of data for a protected species?

Therefore, the Proposed Scheme is unlikely to affect the conservation status of the local badger population and will not result in a significant negative effect, at any geographic scale

12. 12.4.3.4.3 Otter

DLR Otter survey data is available to the consultants and it is unclear if it has been used to support the assessment.

13. 12.4.3.5.1 Breeding Birds

There appear to be no breeding bird survey maps for important birds especially for those habitats likely to be removed. It is also unclear if riparian birds were surveyed or considered in terms of impacts including important birds such as grey wagtail, dipper or kingfisher.

14. Mitigation, Enhancement and Compensation

It is requested that where there is loss of biodiversity and habitats that this is addressed in a realistic manner. It is requested that the information of each habitat for example treeline, hedgerow etc to be lost along with the associated mitigation/compensation is provided.

For transparency it is requested that the location of the mitigation or compensatory measures are shown on maps also, as Chapter 22 Table 22.8 only states: *'Throughout as required'*. The table gives no indication of where they will be located and to what extent.

Also please note that ornamental planting and amenity grass planting are not considered biodiversity mitigation or compensation for biodiversity loss. It is requested that this is addressed by creating suitable biodiversity habitats and also in consideration of appropriate species. If habitats are being proposed as mitigation or compensation for biodiversity then a plan to show how these habitats will be managed for biodiversity is needed.

The Biodiversity chapter of the EIAR should also should seek to provide gains for biodiversity in terms of habitats that will last and survive in the longterm and that will be located in areas away from light spill and human disturbances, in order to provide refuges for biodiversity.

In light of the above it is requested that revised assessments are completed and any relevant revised chapters of the EIAR and AA process take into account all of the above. It is also requested that consultation with DLR's Biodiversity Officer is undertaken.

Biodiversity Officer