



Your Ref: Dublin City Material Alterations
Our Ref: FP2022-040
(Please quote in all related correspondence)

1 September, 2022

Development Plan Team,
Planning and Property Development Department,
Dublin City Council
Block 4, Floor 3,
Civic Offices, Wood Quay, Dublin 8, D08 RF3F

Via Online Portal: www.dublincitydevelopmentplan.ie

Proposed Material Alterations to the Dublin City Draft Development Plan 2022 – 2028

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The Department refers to the correspondence received with respect to the above proposed Material Alterations to the Dublin City Draft Development Plan 2022 – 2028. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

With regards to Material Alteration Reference Number 5.5 comprising the amendment in Chapter 5: of the Draft City Development Plan of:

Objective QHSNO2 Lands at Alfie Byrne Road

To undertake a land use and landscape masterplan for the underutilised lands located south east of Clontarf Road Railway station and railway line and fronting onto Alfie Byrne road to examine their potential for the following uses:

to include *inter alia*

“The masterplan should recognise the role of some of these lands as a feeding ground for Brent Geese and also ensure that development is integrated with the Clontarf Promenade Development and Flood Protection scheme where appropriate.”

The Department welcomes the recognition in this Material Alteration of the importance of the lands along Alfie Byrne for the Brent Goose, one of the Special Conservation Interest (SCI) bird species /Qualifying Interests (QIs) which the adjacent South Dublin Bay and River Tolka Estuary Special Area (SPA) has been designated to protect under the Birds Directive (79/409/EEC).



Flocks of Brent Geese have utilised the amenity grassland areas along Alfie Byrne Road for foraging from late autumn to spring since the 1990s and this recognition of the significance of these lands for the geese is particularly valuable in the context of the additional proposal by the City Council in Zoning Amendment E-0144 to Map E of the Draft Development Plan to rezone a section of land between Alfie Byrne Road and the immediately neighbouring DART railway line to the north west from Z9 Amenity /Open Space Lands /Green Network to Z15 Community and Social Infrastructure. Because of the use of the lands along Alfie Byrne Road by the Brent Geese any future development proposal for this section of land, if it is rezoned in line with this amendment, will have to take into account the possibility that the development might be considered to have an adverse *ex-situ* effect on the South Dublin Bay and River Tolka Estuary SPA if a reduction in the grassland foraging area available to the Brent Geese were to occur as a result of the development proposed.

It is also noted that in *Chapter 9: Sustainable Environmental Infrastructure and Flood Risk Material Alteration Reference Number 9.10* involves the amendment as highlighted in green below of Policy SI 19 Provision and Upgrading of Flood Attenuation Assets

To facilitate the provision of new or the upgrading of existing flood alleviation assets where necessary and in particular, the implementation of proposed flood alleviation schemes, on the Santry, Camac, Dodder, Wad, Naniken, Mayne, Tolka and Poddle rivers as well as Clontarf Promenade, Sandymount “Promenade (northwards towards Irishtown Nature Park subject to the outcome of a flood / environmental study).” Liffey estuary and any other significant flood risk areas being progressed through the planning process “to completion” during the lifetime of the 2022-2028 Dublin City Development Plan, with due regard to the protection of natural heritage, built heritage and visual amenities “as well as potential climate change impacts.”

Sandymount Strand is included within the Natura 2000 sites South Dublin Bay Special Area of Conservation (SAC) and the South Dublin Bay and River Tolka Estuary SPA, and any proposed development of flood defences between Sandymount and Irishtown in line with this amended policy would therefore require assessment of its potential effects on the QI habitats and SCI bird species for which these two European sites are respectively designated. This Department recommends accordingly that the following text should be inserted in Policy SI 19 as amended before the word Liffey: which will include consideration of any potential effects on local Natura 2000 sites.

You are requested to send any further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie, or to the address on the cover page.

Is mise le meas,

Michael Murphy,
Development Applications Unit