

# Cork Nature Network

07.08.2022

An sibin,  
Ballinvoher,  
Castletownroche,  
County Cork  
P51X897

**Ref: case/313994 Strategic Housing Development at Kilbarry on the Old Whitechurch Road, Cork City**

Please find below our comments regarding the above proposal.

1. Whereas we recognise there is an urgent need for housing in Ireland, we also urge that proper and protective measures are appropriately taken for this site to increase biodiversity as per the 2022 national commitments to address the biodiversity crisis.
2. The development should also take into consideration views of the local residents and the lack of urban good quality space for recreation and wildlife. We have managed a site in Beaumont Quarry with Cork City since 2015 where the focus has been on biodiversity and recreation.
3. As stated in the EIAR, Marsh Fritillary has been recorded in past times on the site and it is therefore essential that the habitat is protected in this site to protect this species which has legal protection. The survey in the EIAR was conducted too late and should have been conducted in August when caterpillars are more abundant and easier to find. Mid-September would greatly reduce the opportunities of finding the caterpillar. We ask that this survey is repeated in 2023 taking into account the life cycle of the species.
4. We would have concerns during construction on any impacts on the river and the water table for the marsh fritillary habitat. It is not clear what measures are going to be taken to reduce these impacts..
5. We also ask that all tree planting is for native trees and they are mature. Young trees to replace vegetation will not have such an immediate impact on biodiversity. Mature native trees will have much more impact on biodiversity. It would be preferable if the design could include some biodiversity areas so that those living in the proposed housing have some connection to their local environment and also help to increase the biodiversity footprint of the site.
6. We also ask that more careful consideration is given to any detrimental impacts to the site by diverting the surface run off into the northern part of the Glennamought as it is highly likely that otters do use the river system.



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7. We also note that there are plans to put in an amenity next to the river. These should include a habitat landscape not only for local people to sit and enjoy but also to include biodiversity areas such as a river margin. If this is not put into place there will be disturbance to otters and birds. Fisheries Ireland have advised on riparian zones which should be adopted and result in less disturbance to the aquatic wildlife.
8. Impacts of the development on bats needs more consideration. Bats are a protected species legally and although there is no evidence in the report of roosting, they will use the area for feeding. The impacts of lighting on bats and other invertebrates will cause disturbance and should be addressed.
9. We also ask that care is taken with regards to run off or disturbance to the area during construction is carefully monitored given that the site has had a protected species found in past year and a red listed bird species.
10. We also ask that the design includes sustainable management e.g. renewable energy, reuse of stormwater etc. It would be more in keeping with the national government commitments to address climate change and reduce our consumption on unsustainable resources.

We would be more than happy to discuss these suggestions further if required. We will also be forwarding a copy of our concerns to the local national parks wildlife ranger to enable further discussion on the above points.

Kind regards



Gill Weyman

Cork Nature Network

