



Re: Ballybrack Valley Cycle Track

Dear Sir/Madam,

The Cork Branch of the Irish Wildlife Trust would like to make a submission regarding the above plans for Ballybrack Valley Cycle Track.

Ballybrack Woods is a wonderful green space for the people of Douglas, which allows them to visit and interact with a diverse woodland with wet meadows and riparian vegetation along a stream valley that is an effective habitat corridor connecting Douglas to the wider countryside. The site is also unique to Douglas and is important for local recreation and amenity.

The Irish Wildlife Trust notes the local importance of Ballybrack Woods for wildlife and would like to raise the following concerns regarding the proposed cycle track.

1. Environmental

The area is a home to a large range of wildlife. The Irish Wildlife Trust have conducted surveys on bats and otters at the site. The bat survey found that four species of bat were recorded in the Ballybrack valley; the soprano pipistrelle, common pipistrelle, Leisler's and an unidentified *Myotis* species (Appendix 1. Buckley D. report. Fig. 1). Activity within the site was concentrated along the Ballybrack River, particularly within the alder woodland on the western boundary with the Ardcarraig Apartments.

Myotis bat species (Whiskered, Natterer's and Daubenton's) tend to avoid areas that are lit-up at night, possibly due to their slower flight, which makes them more vulnerable to predation (Bat Conservation Trust 2008). The presence of *Myotis* bats within the Ballybrack valley is therefore likely possible due to the connectivity to the surrounding countryside on the southern end and the fact that the valley is sufficiently dark.

The proposed cycle route could impact on the local bat community in the Ballybrack valley through the installation of artificial lighting, which would affect the *Myotis* bats foraging on the site and through the direct loss of foraging habitat and possibly roosting sites if trees are being cleared to widen the existing path next to the river. A more detailed survey would be required to determine the potential impacts of the proposed cycle route and to survey the roosting potential of mature trees on the site and suitable buildings adjacent to the valley.

The otter survey was conducted by Cork Branch of the Irish Wildlife Trust. The results found spraints in nine locations along the river. In the northern section of the woodland three were found underneath foot bridges and one at the tributary of two rivers to the back of the petrol station on the Donnybrook Road. In the southern section of the site, five spraints were found, three of which were found in the more densely wooded area. These are shown in Appendix 2.

The woodland is providing an invaluable habitat for otters with scope for holts along densely wooded areas of the river. The woodland provides an important corridor for

otters from rural to urban areas. The Cork City Urban Otter survey found that there were six otters using the urban waterways. These were analysed for DNA by the MISE project in Waterford and it was found that the otter population was transitory therefore indicating that there is movement between rural and urban river catchments.

Other signs were noted of foxes and squirrels. There are reported sightings of red squirrels and the Cork Branch will hope to undertake a survey on red squirrels on the site at a later stage.

We are pleased to note that an ecological assessment will be carried out by the Council and we would urge that the resultant report be published and any recommendations for amelioration and mitigation of impact adhered to. We are concerned that the works as proposed will have negative long and short term impacts on the flora and fauna of the Woods. We would welcome a comprehensive consideration of this issue. We are also willing to work with the County Council on this site and can offer educational talks and walks on the ecological importance of the site.

Our recommendations are that given the presence of bats, otters, the woodland as a wildlife corridor and the lack of public natural space Ballybrack Woodlands be maintained in its current state and that paths are improved but not widened.

3. Width of path

The proposed cycle track is 3m in width, which will necessitate the removal of a number of mature trees. The IWT feels that the proposed track is too wide and inappropriate to the setting. It may make the enclosed tranquil valley feel like a roadway. We do not see any needs survey in terms of potential use. Mixing cyclists and pedestrians, buggies in such a matter will result in conflict and concerns over safety.

We strongly oppose the cutting down of any trees, especially of mature trees. In addition, the use of heavy machinery on what is mainly floodplain, water saturated soft soils will result in soil compaction, which will affect tree roots and survival of trees left standing close to the path. We therefore request that the width of the path should be reconsidered. Additionally, Phase 1 of the cycle path is currently hard surfaced and cyclable in its current condition and it is preferred if this is left with some measures of path improvement being undertaken.

4. Restoration of habitat following works

In order to compensate for the mature trees and other habitat that will be lost to the proposed works, the IWT request that an equal or greater number of native trees and shrubs be planted and allowed to reach maturity if any trees are to be removed.

5. Drainage and river protection works

Drainage and river protection works are mentioned on the planning notice, but the published plans give no indication about the extent of these works. As a consequence, we do not know what changes are proposed for the river in the Woods. We strongly urge the Council to publish in detail its plans for drainage and associated works before any consultation process is concluded.

The track appears to pass very close to the waterway in places, but no detail is given. The IWT feel it is important to maintain a vegetated river bank to protect the river corridor and provide shade and refuge for aquatic creatures especially otters. An additional vegetated margin of >1m width to filter surface run-off from the cycle path would be preferable, where space allows but a clear indication must be given of where this run off will finish and if it is to be treated for any pollutants given that otters have been identified as using the river. The Irish Wildlife Trust have surveyed the river and there are otter spraints at a number of locations along the river. These have been given in Table 1.

6. Lighting

We are very concerned about the effect of lighting on wildlife in the woods. Currently it is an unlit corridor between streetlit roads on either side and provides something of a refuge for nocturnal animals, as well as an excellent movement and habitat corridor. Street lighting is well-known to alter the behaviour of bats and birds. A survey of bats at the site has indicated that there will be impacts upon foraging bats. (Bat report attached) We therefore strongly urge reconsidering whether lighting is necessary. There are currently lit roadways on both sides of the park, enabling cyclists to have a lit alternative route after dark.

7. Barriers

A wide cycle track will open the wood up to other motorised vehicles. Sturdy barriers to prevent motorised vehicular access will be required.

8. Cycle and walkway

We note that much of the proposed cycle path occupies an existing footpath. Where cyclists and pedestrians use the same route, there needs to be clear separation of the users to prevent collisions, with appropriate clear signage.

9. Litter

We note there is at present some dumping within the site. The proposed cycle path will improve access to the site and further advertise its presence. It is important for wildlife that litter is cleared regularly, so that small mammals and invertebrates do not become trapped within e.g. drinks cans.

We trust that you will give serious consideration to our concerns. We would be interested to participate in any further meetings or discussions to progress the plan and address our (and other) concerns.

Kind regards

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