

Report on the proposed changes to the Draft Dublin City Biodiversity Action Plan 2021-2025



**Arts, Culture, Leisure and Recreation
Strategic Policy Committee**

November 2021



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Overview of the public consultation process

There now follows an overview of the results of the public consultation process for the Draft Biodiversity Action Plan (2021-2025). For a more detailed report, please refer to the *'Report on the public consultation process for the Draft Dublin City Biodiversity Action Plan 2021-2025'*, which is provided as an attachment.

The preparation of the Draft Dublin City Biodiversity Action Plan 2021-2025 was through direct engagement with various stakeholders identified through the implementation of the current plan. Despite the challenges of public engagement during Covid-19 restrictions, the consultation was promoted through various channels and respondents could make submissions via an online portal, post, or email.

In total, 122 submissions were received, the majority through the online portal (112 responses), with just 10 received via email and none by post. The response rate was similar to that of other DCC online public consultations by DCC Parks, Biodiversity and Landscape Services. Respondents were from across society, including elected representatives, individuals, community groups, environmental NGOs and other organisations. Respondents using the online consultation portal were asked set questions on their views on the themes of the draft plan and their awareness and activities on biodiversity issues.

Overall, the response to the plan was positive with respect to the majority of themes, objectives and actions. Main concerns raised were seeking more practical actions by Dublin City Council and clarification on timelines and ensuring delivery of results. The recurring issues that were raised by respondents included:

- Increasing green space and having areas set aside for biodiversity across the city;
- Sustainable development;
- Reducing mowing and having planting schemes for pollinators;
- Elimination of pesticides;
- Planting more trees and retaining mature trees;
- Having more Citizen Science projects;
- Increasing education and outreach programmes for citizens and schools;
- Working with and offering support to community groups.

Discussion of Results

The majority of those surveyed (89%) ranked biodiversity as very important to their quality of life, with the remainder ranking it as somewhat important. Over half of those surveyed (54%) had not read the previous Dublin City Biodiversity Action Plans, indicating that the public consultation process increased awareness and introduced some citizens to this policy. Nearly 76% of all those surveyed thought that the plan gave a good overview of biodiversity in Dublin City. Just over half of those surveyed responded to whether the plan was easy to understand. Of these, 75% thought it was, with some commenting that the plan was ambitious and needed more targeted actions.

When respondents were asked what actions should be added or amended, less than half replied. The following submissions are addressed by way of proposed amendments to the Draft Plan and other measures:

1. Based on a submission from House Martin Conservation UK & Ireland (HMCUK-IE), it is proposed to include House Martin (*Delichon urbicum*) alongside the actions for Swift (*Apus apus*) as it is a bird with similar requirements, migration cycles and conservation concern and it would be effective to act for both in this way.
2. A submission has recommended that Irish hare (*Lepus timidus hibernicus*) be included in the list of protected mammals in Dublin City and within an action, so as to ensure that it is monitored and managed for, given its important conservation concern and decline within Dublin City. It is proposed to amend Table 2a and Action 4.2 to include this important species.
3. A submission was to add an action to work on reducing light pollution. This will be addressed by way of a proposed Objective in the Draft Dublin City Development Plan. Therefore, it is not proposed to amend in the Biodiversity Action Plan.
4. More detail on implementation was requested. This will be way of annual reports, newsletters and updates to Council and this SPC.
5. Actions were requested on specific categories of information, e.g. biodiversity for private gardens. As Objective 16 addresses this already in a strategic level and it is not considered necessary to create an action for each type of guidance given.
6. Increased control on tree removal (both on public lands and highlighting the value of trees for private gardens) was requested. This is being considered in detail in the Draft Dublin City Development Plan and the forthcoming City Tree Strategy. Controls must be in line with national legislation. Currently, the Forestry Act (2014) provides an exemption for urban trees from any controls, other than if as part of a planning consent under the Planning Act or for safety reasons under the Roads Act.
7. Actions on allotments were sought. This is being considered in the Draft Dublin City Development Plan.
8. Education and practical actions to help combat water pollution were sought. This will be relayed to the appropriate Dublin City Council personnel and LAWPRO.
9. Some partner organisations and agencies that had been part of the Biodiversity Forum requested slight changes to the text in the document, or decided to sign up as partners to specific actions. These changes have been captured in Table 3 (pages 9-15) in this document.

Proposed changes for the Draft Dublin City Biodiversity Action Plan 2021-2025

Following consultation, some actions were updated, reworded, amalgamated or omitted for the following reasons:

1. To better align and prevent duplication with other council policy documents
2. To reflect changed circumstances since the first draft
3. To clarify our role/commitment when working with other agencies
4. To clarify focus and parameters of the Action.

The most significant change to the draft plan is the removal of the Theme: Dublin as a Green Capital City. Just over 62% of those surveyed responded to this theme. However only 7% of respondents expressed to liking the idea of applying for awards to promote biodiversity (such European Green Capital), while 20% thought that resources should be used for more practical actions. Many responded that a lot of work is required to bring Dublin to a standard in line with other European cities and the term 'green washing' was also mentioned by 4% of respondents. In retrospect, there is little merit in referencing these potential awards and declarations, as there is no decision whether DCC will make an application in the future. The other actions under this theme 15.1, 15.3 and 15.4 are supported through other actions in this plan or in other DCC plans.

There were requests to add the following four new actions, which have been added to the plan:

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| Action 3.2 | Continue to manage areas identified in the 2018 Flora Survey in accordance with recommendations from the survey |
| Action 4.8 | Support the DBBP to conduct a bay-wide grey seal (<i>Halichoerus grypus</i>) tagging and monitoring survey |
| Action 4.11 | Update wildlife impact surveys on North Bull Island |
| Action 15.7 | To develop content for Biodiversity Education/Outreach Programmes for proposed educational centres at Liffey Vale and North Bull Island (subject to planning approval). |

There were requests to remove 16 actions from the plan, which have been detailed in Table 2 in this document (pages 6-8). To reduce the width of the Action tables, the 'Lead Agency' has been removed (as DCC is the main lead for most projects) with the 'Supporting Agency' column being changed to 'Agencies & Partners'. The action numbers have also been updated to reflect omissions, additions and amalgamations.

Recommendation to the SPC:

Following on from a public consultation process of the Draft Dublin City Biodiversity Action Plan and a review of submissions received, consideration be given by the members of the SPC to:

- (i) Report of the public consultation process for the Draft Dublin City Biodiversity Action Plan 2021-2025
- (ii) Report on the proposed changes to the Draft Dublin City Biodiversity Action Plan 2021-2025

If both reports are agreed by the SPC members, it is proposed to include the Draft Dublin City Biodiversity Action Plan 2021-2025 on the December meeting of the City Council for consideration and agreement.

This report has been prepared by Lorraine Bull, Biodiversity Officer, with contribution from Maryann Harris, Senior Executive Parks and Landscape Officer; Leslie Moore, Head of Parks Services for Dublin City Council; and Shane Casey, Acting Senior Executive Parks and Landscape Officer.

Table 1. The proposed Actions to be added to the Dublin City Biodiversity Action Plan, 2021-2025

Action No.	Action	Timeframe	Agencies & Partners	Performance Indicators	Requested by/Reason
3.2	Continue to manage areas identified in the 2018 Flora Survey in accordance with recommendations from the survey	2021-2025	DNFC	No. of areas managed & completed recommendations	This action has been proposed by the North Bull Island Management Team.
4.8	Support the DBBP to conduct a bay-wide grey seal (<i>Halichoerus grypus</i>) tagging and monitoring survey	2024	DBBP, DLR, DPC, FCC, NPWS, ISS	Survey completed & results published	This action is being conducted as part of the Dublin Bay Biosphere Partnership. The action number replaces the former 4.8, which has been amalgamated with 4.7.
4.11	Update wildlife impact surveys on North Bull Island	2021-2025	DBBP, BWI, HSI	No. of surveys completed & results published	This action has been proposed by the North Bull Island Management Team.
15.7	To develop content for Biodiversity Education/Outreach Programmes for proposed educational centres at Liffey Vale and North Bull Island (subject to planning approval).	2022-2025	ECO-UNESCO	Content developed	This action has been proposed by the North Bull Island Management Team

Table 2. The proposed Actions to be removed from the Dublin City Biodiversity Action Plan, 2021-2025

Action No.	Action	Timeframe	Agencies & Partners	Performance Indicators	Requested by/Reason
5.6	Share data with the central clearing house for monitoring impacts of climate change on biodiversity in accordance with the Sectoral Climate Change Adaptation Plan	2021-2025	DHLGH	EPA, BIM, MI, Third level, DCC & LAs	Proposed to remove as it is a policy of DCC to share data with required agencies and there was confusion over the 'Central Clearing House', which also refers to LIFE applications.
7.6	Update the Dublin City Hedgerow Survey	2025	-		It is proposed to remove this action and put in the next Biodiversity Action Plan (2026-2030).

8.7	Prepare a strategy for the rehabilitation of historic landfills in public parks and open spaces for Dublin City.	2021-2024	-	Strategy completed	It is proposed to remove the following action and defer until the next Biodiversity Action Plan (2026-2030) due to changes in resourcing.
8.9	To assess performance of measures for restoration to learn what is most effective in Dublin City	2021-2025	Third Level, DNFC	Evaluation reports produced for projects	It is proposed to remove the following action as this will be captured during projects and it reduces the number of actions to streamline the document.
9.5	Update the Dublin City Tree Map to monitor attributes of the urban forest that support biodiversity and ecosystem services	2022-2024	Third level, NGOs, community groups	Update completed	It is proposed to remove from this plan as it will an action in the forthcoming Dublin City Tree Strategy.
11.3	To implement actions for ecology under Section EN5.0 of the Home Performance Index (HPI) for all DCC new build housing schemes	2021-2025	Irish Green Building Council	No. of schemes where HPI minimum level 3 is achieved	It is proposed to remove this action as it is a voluntary scheme, which would fall under the remit of planning and the Dublin City Development Plan.
11.4	To incorporate Inland Fisheries Ireland's guidance on Planning for Watercourses in the Urban Environment into plans and projects	2021-2025	IFI	Percentage of plans & projects implementing the guidance	It is proposed to remove this actions as it is reflected in the Draft City Development Plan.
12.6	To establish biodiversity standards for green, brown, and blue roofs	2022	-	Standards published	It is proposed to remove this action as it is covered under Action 11.1 and in the Dublin City Development Plan.
14.3	Restrict development of green areas which results in soil sealing	2021-2025		Percentage of unsealed area	It is proposed to remove this action as it falls under the remit of planning.
14.4	Require calculations of soil sealing/unsealing for projects as part of assessment of planning applications.	2021-2025		Percentage of unsealed area	It is proposed to remove this action as it falls under the remit of planning.
15.1	Measure progress on biodiversity to support Dublin City's efforts to attain EU Green Capital status by 2026	2021-2025	-	Completion of report on biodiversity & green infrastructure for application	The Theme this action sits under is being removed due to public feedback. The EU Green Capital application is overseen by Climate Change. Monitoring of biodiversity will be supported under other actions in this plan.

15.2	Manage and monitor biodiversity indicators and implement biodiversity measures so that Dublin City can join the Green City Accord, under the EU Biodiversity Strategy	2021-2025	NGOs, DNFC	Completion of report & continue to monitor indicators to maintain membership of the Accord	The Theme this action sits under is being removed due to public feedback. Monitoring of biodiversity indicators will be supported under performance indicators through this plan.
15.3	Strengthen alliances with other European and EU capital cities in leading initiatives for biodiversity	2021-2025	DBBRP, Third level, CARO	No. of initiatives developed	The Theme this action sits under is being removed due to public feedback. Action 18.6 covers EU funded projects.
15.4	Support research on increasing biodiversity to improve health outcomes and access to nature	2021-2025	DCC, Third level, other	No. of research activities supported	The Theme this action sits under is being removed due to public feedback. This action can be supported under research projects.
18.3	Increase collaboration with communities through the support of the Dublin City Council Area Offices and Dublin Bay UNESCO Biosphere	2021-2025	DBBRP	No. of projects with community groups	It is proposed to remove this action as it can be amalgamated into 16.3 and help streamline the document.
18.5	Work with members of the Eastern and Midland Regional Assembly to improve regional conservation and management of biodiversity	2021-2025	LA members	No. of meetings held & joint initiatives	It is proposed to remove this action as it can be amalgamated into draft action 18.7 (final action 18.4) to help streamline the document.

Table 3. The requested wording changes to Actions in the Final Dublin City Biodiversity Action Plan 2021-2025

Wording in Draft Dublin City Biodiversity Action Plan:			Proposed wording in Final Dublin City Biodiversity Action Plan:			Unchanged		Requested by/Reason for change
Action No.	Action	Timeframe	Action No.	Action	Timeframe	Agencies & Partners	Performance Indicators	
2.2	Implement the biodiversity measures identified in the North Bull Island National Nature Reserve Management Plan	2021-2025	2.2	Implement the North Bull Island Nature Reserve Action Plan	2021-2025	DBBP, NPWS, NBI Oversight Forum	No. of actions from the plan completed	NBI Management Team / To implement all measures, not just biodiversity
2.3	Implement the conservation objectives of the Dublin Bay UNESCO Biosphere Reserve Conservation and Research Strategy	2021-2025	2.3	Support the implementation of the Dublin Bay UNESCO Biosphere Reserve Conservation and Research Strategy	2021-2025	DBBP, NPWS, DPC, DLRCC, FCC, FI, DNFC, NGOs	No. of actions from the plan completed	Requested by Dublin Bay Biosphere Partnership who are leading on this
2.7	Prepare grassland management guidelines for the management of Brent Goose feeding sites on all lands in State and semi-state ownership, including public parks, schools, and other lands.	2022	2.7	Support the DBBP to prepare grassland management guidelines for the management of Brent Goose feeding sites.	2021-2023	DBBP, DLRCC, FCC, IBGRG, NPWS, BWI	Strategy completed	Requested by Dublin Bay Biosphere Partnership who are leading on this action.

2.8	Create a database and map of the feeding and roosting sites of Light-bellied Brent Geese within Dublin City to inform development, in conjunction with the Dublin Bay Biosphere Reserve Partnership, University of Exeter, and the Irish Brent Goose Research Group	2022	2.8	Support the DBBP to create a database and map of the feeding and roosting sites of Light-bellied Brent Geese within Dublin City to inform development, in conjunction with the Dublin Bay Biosphere Reserve Partnership, University of Exeter, and the Irish Brent Goose Research Group	2021-2022	DBBP, DLRCC, FCC, UoE, IBGRG	Database completed	Supporting the Dublin Bay Biosphere who are leading on this
4.2	Conduct new and repeat surveys of mammals in parks across Dublin City (targeting badger, hedgehog, and pygmy shrew) to inform conservation management	2024	4.2	Conduct new and repeat surveys of mammals in parks across Dublin City (targeting Irish hare, badger, hedgehog, and pygmy shrew) to inform conservation management	2024	NUIG, IWT	Survey completed & results published	Public request/To include Irish hare to action
4.4	Update Herpetofauna (common frog, common lizard, and common newt) surveys of Dublin City parks	2022	4.4	Update Herpetofauna (common frog, common lizard, and common newt) surveys and assess suitable habitats in Dublin City parks	2022	HSI	No. of surveys completed & published	It was requested to add assessing suitable habitats
4.7	Implement the recommendations of the Dublin City Otter Survey (2019)	2021-2025	4.7	Implement the recommendations of the Dublin City Otter Survey (2019) and update the survey to include Dublin canals	2023-2025	NPWS, WWI, other State Agencies	No. completed by 2025 and survey of canal completed & results published	Draft Actions 4.7 and 4.8 amalgamated into one action 4.7

4.8	Update the Dublin City Otter Survey (2019) and expand to include Dublin canals	2024	4.7	Implement the recommendations of the Dublin City Otter Survey (2019) and update the survey to include Dublin canals	2023-2025	NPWS, WWI, other State Agencies	No. completed by 2025 and survey of canal completed & results published	Draft Actions 4.7 and 4.8 amalgamated into one action 4.7
4.9	Update survey of grey and common (harbour) seal in Dublin City	2023	4.9	Update the 2018 grey seal (<i>Halichoerus grypus</i>) and common seal (<i>Phoca vitulina</i>) census of Dublin Bay	2024	DBBP, ISS	Survey completed & results published	It was requested to specify the date of the seal survey to be repeated as the National Parks and Wildlife Service also run seal surveys.
4.10	Develop an agreed approach to recording seal mortality within the Dublin City area	2021-2025	4.10	Develop an agreed approach to recording seal mortality within Dublin Bay	2021-2025	DBBP, ISS, SRI, NPWS	Approach agreed & disseminated to partners	Dublin Bay Biosphere Partnership will be part of this action. Wording changed to reflect the whole of Dublin Bay.
5.1	To identify natural and cultural heritage at risk from climate change in Dublin City and quantify the impacts to inform planning and management decisions	2021-2023	5.1	Identify natural heritage at risk from climate change in Dublin City to inform planning and management decisions	2021-2023	Various including CARO, Third level, NGOs, DNFC	No. of species & habitats identified as at risk	It is proposed to remove the wording cultural as this will be covered by the Heritage Plan
6.2	Undertake Swift monitoring projects and establish new sites with community groups and through development controls	2022-2025	6.2	Undertake Swift and House Martin monitoring projects and establish new sites with community groups and through development controls.	2022-2025	SCI, BWI, HMCUK-IE, landowners, communities	No. of new sites established & monitoring reports completed	Requested by HMCUK-IE / to include house martin (<i>Delichon urbicum</i>) with actions for swift (<i>Apus apus</i>) as it is a bird with similar requirements, migration cycles

								and conservation concern.
6.6	Conduct bird ringing and monitoring surveys in public parks and install nest boxes where appropriate	2021-2025	6.6	Conduct bird ringing and monitoring surveys in City Centre public parks and install nest boxes where appropriate	2021-2025	IMRG	No. of parks surveyed, monitoring statistics & No. of bird boxes	Requested to highlight the project is happening within the City Centre
6.7	Prepare a survey of Peregrine Falcon sites	2023-2024	6.7	Initiate a Dublin City raptor survey and monitoring programme	2022-2025	BWI	No. of species surveys completed and monitoring programme established	BWI requested to expand the action to include other raptor species.
7.2	Update the Dublin City Habitat Map	2025	7.2	Ground truth habitats and update the Dublin City Habitat Map	2022-2025	DNFC	Map completed	To conduct ground truthing of habitats as well as general update
8.1	Identify and map sites owned by DCC for habitat restoration and prepare a strategy	2021-2023	8.1	Identify sites owned by DCC for habitat restoration potential	2024-2025	UCD, DNFC, NGOs	No. of sites identified	Project scaled back due to budget and resources
8.2	Develop and implement river restoration measures for all rivers in Dublin City, including continuing measures for the River Tolka and new initiatives for the Santry and Camac Rivers	2021-2025	8.2	Support river restoration measures for key rivers in Dublin City, including continuing measures for the River Tolka and new initiatives for the Santry and Camac Rivers	2021-2025	LAWPRO, IFI, ANG, OPW, NPWS, DNFC	Extent of river zones restored	Changes to reflect DCC supporting agencies and partners as well as conducting river restoration measures itself.
8.5	Implement measures to support migratory fish and their life cycles, particularly Atlantic salmon, eel, and lamprey	2021-2025	8.5	Support Inland Fisheries Ireland to implement measures to support migratory fish and their life cycles, particularly Atlantic salmon, eel, and lamprey	2021-2025	IFI, DCC, OPW, NPWS, LAWPRO, ANG	No. of measures completed	Changes to reflect DCC supporting agencies and partners as well as conducting river restoration measures itself.

8.6	Investigate the potential for a seagrass (<i>Zostera</i> spp.) restoration project in Sandymount Strand	2021-2024	8.6	Investigate the potential for a seagrass (<i>Zostera</i> spp.) restoration project in Sandymount	2021-2024	NUIG, CWI, NPWS,	Research Project initiated	Removing 'Strand' to denote along Sandymount and Merrion areas.
9.1	Identify and map habitats, species and supporting features that provide ecosystem services	2023-2024	9.1	Produce an ecosystem services map for biodiversity in Dublin City	2023-2024	DBBP, Third level, NGOs, community groups	Map completed and published	Word change to improve readability
10.1	Update the Dublin City Invasive Alien Species Action Plan, 2016-2020 in accordance with European and national legislation	2021-2022	10.1	Map species, quantify problem and implement actions to control IAS on public lands and waterways	2021-2025	DHLGH, NPWS, FCC, DLRCC, SDCC, ANG, IW, WWI, LAWPRO	No. of areas mapped, problems identified and actions implemented	Draft Actions 10.1, 10.2 and 10.3 amalgamated into one practical action 10.1 for invasive species control.
10.2	Update the survey of DCC waterways for invasive alien species	2022-2025	10.1	Map species, quantify problem and implement actions to control IAS on public lands and waterways	2021-2025	DHLGH, NPWS, FCC, DLRCC, SDCC, ANG, IW, WWI, LAWPRO	No. of areas mapped, problems identified and actions implemented	Draft Actions 10.1, 10.2 and 10.3 amalgamated into one practical action 10.1 for invasive species control.
10.3	To ensure implementation of the Dublin City Invasive Species Action Plan for all projects and operations by DCC departments	2021-2025	10.1	Map species, quantify problem and implement actions to control IAS on public lands and waterways	2021-2025	DHLGH, NPWS, FCC, DLRCC, SDCC, ANG, IW, WWI, LAWPRO	No. of areas mapped, problems identified and actions implemented	Draft Actions 10.1, 10.2 and 10.3 amalgamated into one practical action 10.1 for invasive species control.

11.1	Develop a set of standard conditions for biodiversity conservation in Dublin City to enable an efficient and consistent approach to planning and development	2021-2025	11.1	Develop a Technical Guidance Document containing a set of standard conditions for biodiversity conservation in Dublin City to inform planning and development	2021-2025	NGOs	Conditions prepared & in use	Document now has a title and is referred to in this way in the Development Plan so changing to make it easier for people to refer to.
11.2	Develop best practice guidance on mitigating impacts for biodiversity in new and existing building projects	2021-2025	11.2	Disseminate best practice guidance on mitigating impacts for biodiversity in new and existing building projects	2021-2025	NGOs, DNFC, HC, HON	No. of guidance publications disseminated	Wording changed to reflect dissemination of non DCC guidance as well as DCC guidance.
12.3	To prepare a Dublin City Green Infrastructure Strategy	2021-2025	12.3	To contribute to the Dublin City Green Infrastructure Strategy	2021-2025		Strategy completed & adopted	This is an action of the DC Climate Action Plan and referenced so in DC Development Plan. Wording changed to contribution & other departments.
12.4	DCC SUDS Strategy published and updated accordingly to promote net biodiversity gain	2021	12.4	Contribute to the DCC Sustainable Urban Drainage Systems (SuDS) Guidelines to promote net biodiversity gain	2021-2022	-	Guidelines adopted with review process ongoing	Wording change to reflect that there are a set of guidelines being produced rather than a single Strategy.
Objective 14	Minimise and reverse soil sealing in the Dublin City Council administrative area		Objective 14	Minimise and reduce soil degradation in the Dublin City Council administrative area				Advised to change by the Geological Survey of Ireland to reflect different types of soil degradation including soil sealing.

14.1	Actively assess soil degradation in Dublin City for all functions of soil, including establishing the status of soil sealing, to reach the EU Parliament's objectives of "no land degradation" by 2030	2021-2022	14.1	Support research on soil sealing and soil geochemistry to advance knowledge of soil degradation in Dublin City	2021-2022	UCD, GSI	No. of surveys supported	Advised to change by the Geological Survey of Ireland as active assessment not feasible at this time in Ireland.
16.4	Produce a range of resources to raise awareness of biodiversity across the city, including guides on how people can help biodiversity at home	2021-2025	16.4	Disseminate a range of resources to raise awareness of biodiversity across the city, including guides on how people can help biodiversity at home	2021-2025	DNFC, NGOs	No. of resources produced & distributed	To reflect other resources that may not be produced by DCC but disseminated by DCC.