



NEWTOWN PEDESTRIAN AND CYCLIST SCHEME, TRAMORE, CO. WATERFORD

Part 8 Explanatory Report

prepared pursuant to the requirements of Part XI, Section 179 of the Planning and Development Act 2000 as amended and Part VIII, Article 80 & 81 of the Planning and Development Regulations 2001 as amended

November 2022



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1 Introduction

In accordance with Part XI, Section 179 of the Planning and Development Act 2000 as amended, and Part VIII, Article 80 & 81 of the Planning and Development Regulations 2001 as amended, Waterford City and County Council has given notice of its intention to carry out a pedestrian and cycle improvement scheme along the Newtown Hill and Newtown Glen in Tramore as shown in Figure 1.1 below comprising narrowing of the existing carriageway and provision of new and upgraded pedestrian and cycle facilities within the scheme extents.

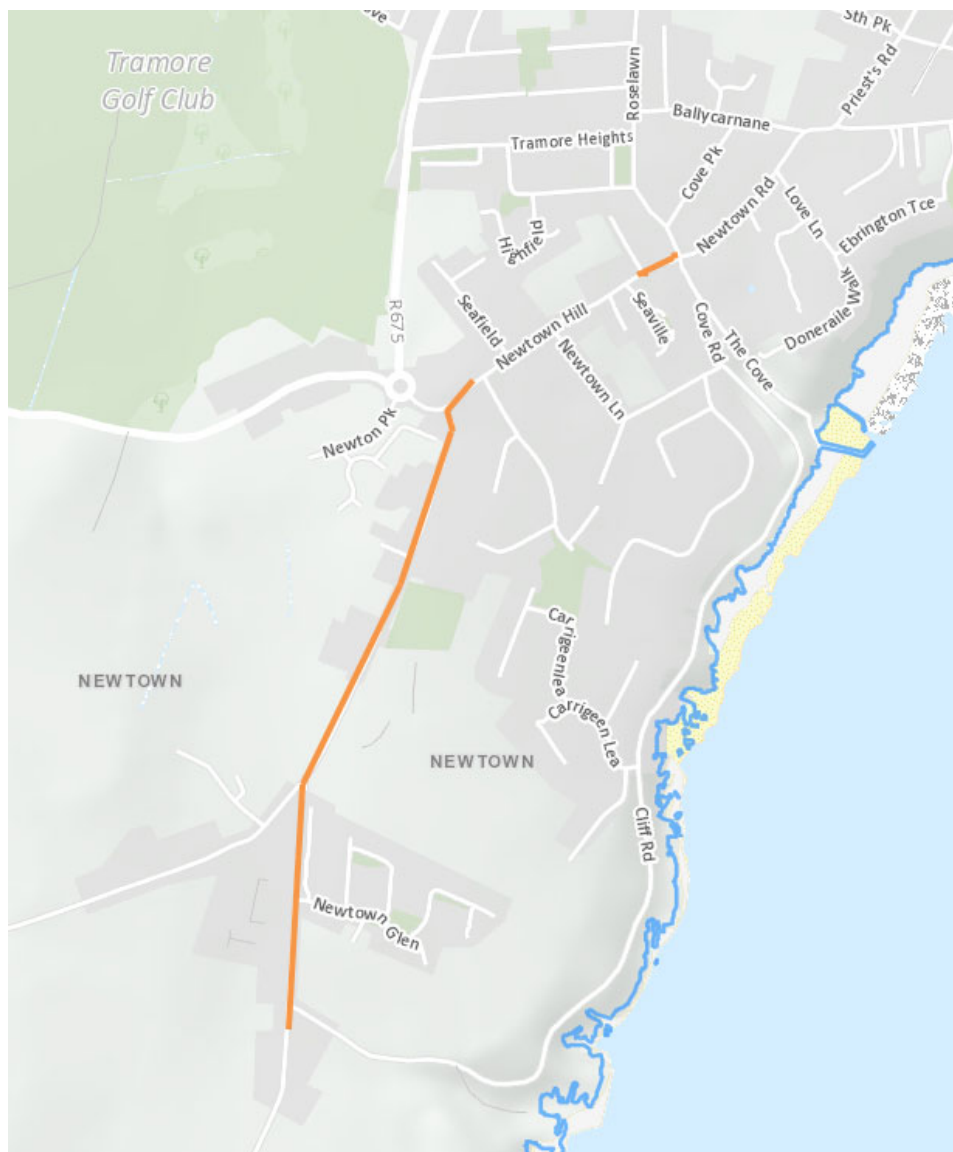


Figure 1.1 Scheme Extents

This report is prepared for inclusion with the Plans and Particulars being made available for public inspection in accordance with the above Act and Regulations. It describes the need for and objectives of the Proposed Scheme and provides a detailed description of it. This report is to be read in conjunction with the following drawings included in Appendix A which show details of the Proposed Scheme and which, along with this Report, will also be made available for public inspection:

Drawing number	Rev	Drawing Title
210512-101	5	Proposed Layout – Sheet 1 of 3
210512-102	5	Proposed Layout – Sheet 2 of 3
210512-103	5	Proposed Layout – Sheet 3 of 3

2 Need for Scheme

There are a number of specific safety issues identified that need to be addressed including:

- The width of the Newtown Hill and Newtown Glen varies from 8.9m to 11.3m which are conducive to the development of inappropriate speed.
- There is a lack of adequate pedestrian crossings along Newtown Hill and Newtown Glen.
- The existing footpath widths are narrow in places and may not be able to accommodate two pedestrians passing one another.
- There are no cycle facilities along the entire length of the scheme.
- There is one primary schools, one secondary school, a sports ground, Caravan & Camping Park, and several housing estates within the 1,5km radius. The existing pedestrian and cycle facilities are not sufficient to cater for the pedestrian and cycle flows to and from these developments.

3 Scheme Objectives

The scheme objectives are as follows:

- to prioritise pedestrian and cycle movements over vehicles
- to provide a safer and more attractive connection between schools, sports ground, Caravan & Camping Park, and the numerous housing estates along the scheme extents.

4 Design Standards

The scheme is located within the 50km/h speed limits. It has been designed in accordance with the following design standards:

- Design Manual for Urban Roads and Streets (DMURS)
- National Cycle Manual
- Traffic Signs Manual
- TII Publications

5 Principal features of the Scheme

The main elements of the proposed scheme are:

- Reduction in carriageway width by the provision/improvement of footpaths and cycle lanes and shared surface to encourage reduction in speed and to reduce crossing distances at pedestrian crossings.
- Provision of adequate width footpaths throughout the scheme.
- Provision of an adequate cycle-pedestrian shared facility along L4054-0 Newtown road and L-8089-0 Newtown Woods road.

The typical cross-section along the Newtown section of the scheme will consist of the following:

Typical cross section

- Verge
- 3.0m Shared Surface (pedestrian and cyclist)
- Verge
- 6.0m Carriageway
- Verge

6 Environmental Assessment

6.1 APPROPRIATE ASSESSMENT

Please refer to PRE-PART 8 PLANNING ASSESSMENT report and Habitats Directive Project Screening Assessment report.

6.2 ECOLOGICAL ASSESSMENT

The following information was sourced from the Geohive database

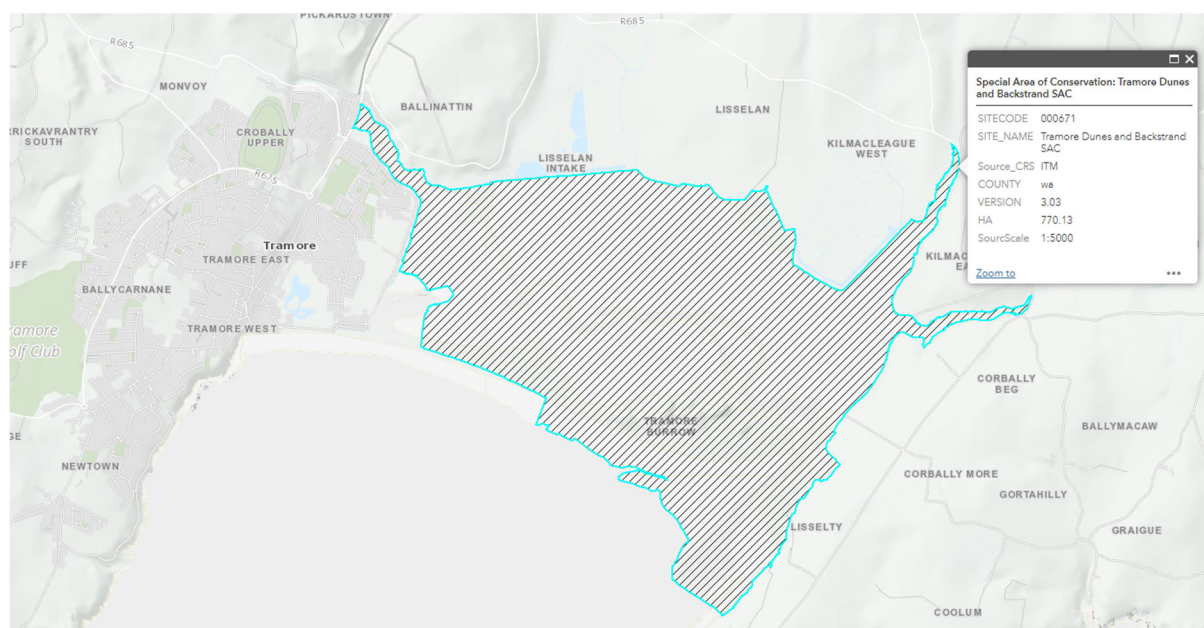


Figure 6.1 Tramore Dunes and Back Strand SAC (source: Geohive Map)

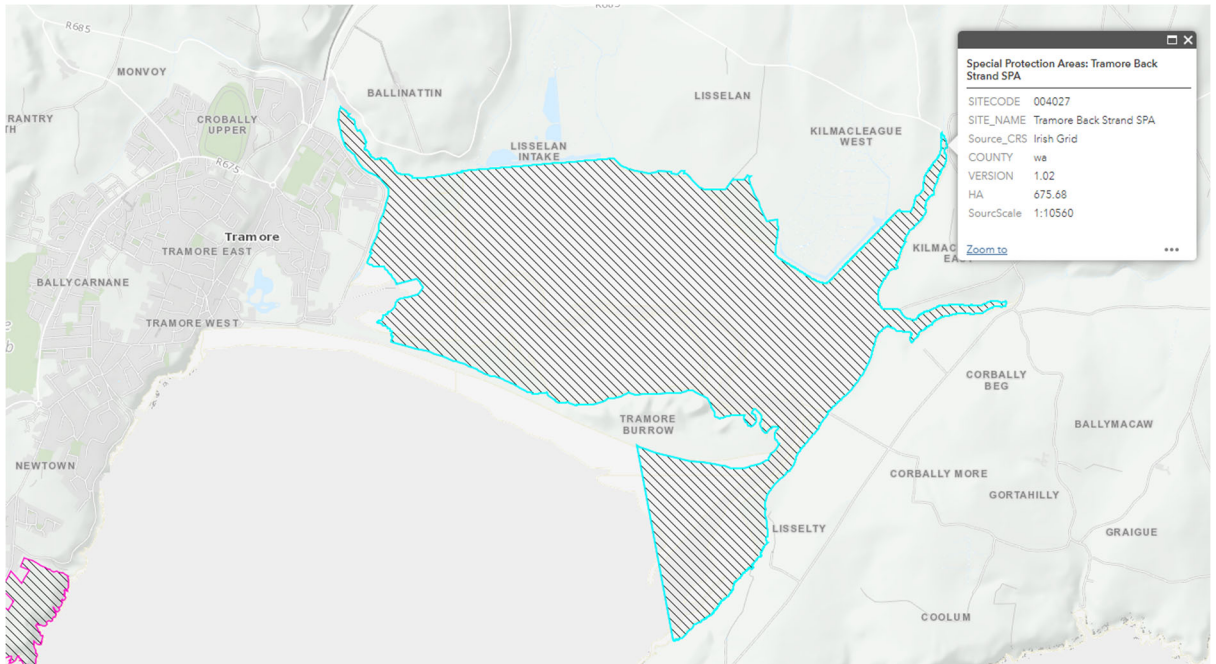


Figure 6.2 Tramore Back Strand SPA (source: Geohive Map)

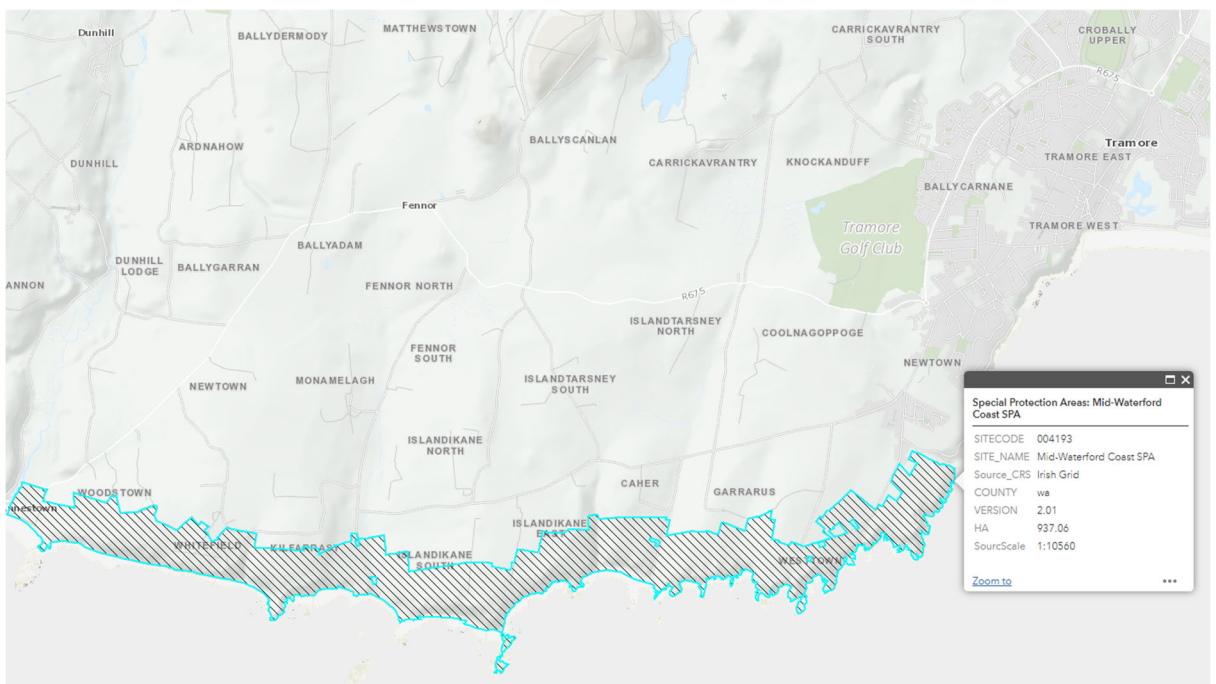


Figure 6.3 Mid-Waterford Coast SPA (source: Geohive Map)

The ecological sites shown in the images above are a Special Area of Conservation named Tramore Dunnes and Back Strand SAC, Site Code 000671, a Special Protection Area named Tramore Back Strand SPA, Site Code 004027, and a Special Protection Area named Mid-Waterford Coast SPA, Site Code 004193.

None of the above sites are located within the scheme extent. It can be concluded that the proposed scheme, individually or in combination with other plans or projects, will have no effect on any of the ecological sites.

6.3 ARCHAEOLOGICAL CONSTRAINTS

The following information was sourced from Geohive database.

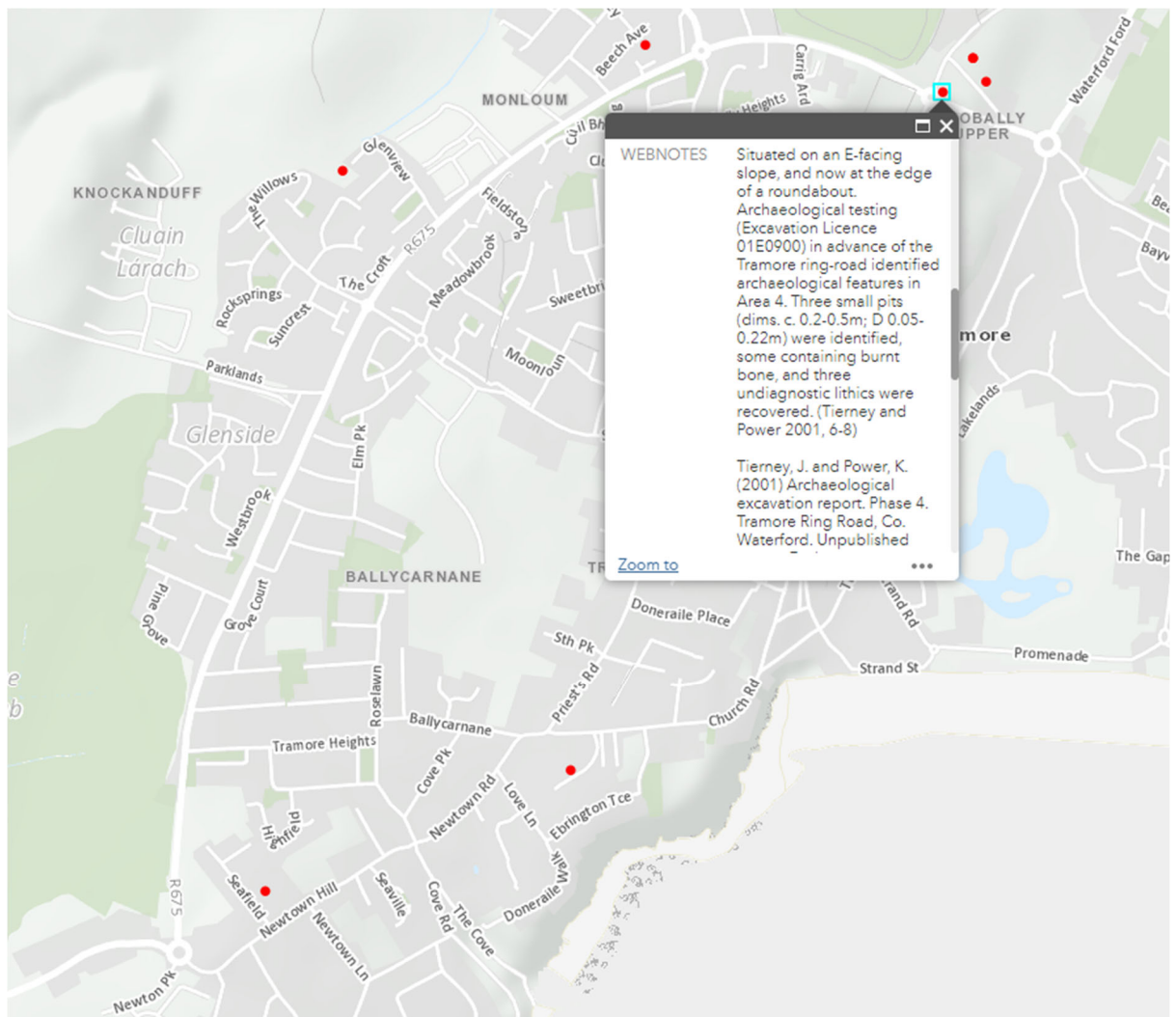


Figure 5.4 National Monuments Service - Archaeological Survey of Ireland (source: Geohive Map)

The National Monuments Service – Archaeological Survey of Ireland, viewable on the Geohive database, shows the following archaeological sites shown on Figure 5.4 above. In the table below the site(s) are listed and described.

	Entity ID	Name	<i>Description</i>
1	WA03321	Archaeological features in Area 4, Tramore Ring Road	Situated on an E-facing slope, and now at the edge of a roundabout. Archaeological testing (Excavation Licence 01E0900) in advance of the Tramore ring-road identified archaeological features in Area 4. Three small pits (dims. c. 0.2-0.5m; D 0.05-0.22m) were identified, some containing burnt bone, and three undiagnostic lithics were recovered. (Tierney and Power 2001, 6-8). Tierney, J. and Power, K. (2001) Archaeological excavation report. Phase 4. Tramore Ring Road, Co. Waterford. Unpublished report. Eachtra Archaeological Projects. Compiled by: Michael Moore Date of upload/revision: 27 May 2011

A desktop review concluded that the above archaeological site is in the proximity of the scheme but will not be impacted by the scheme. Given the nature and extent of the proposed works, there are no archaeological constraints to the project.

6.4 ARCHITECTURAL HERITAGE CONSTRAINTS

A review of the National Inventory of Architectural Heritage (NIAN) National database, viewable on the Geohive database, indicated no known sites within the scheme extent.

7 Public Display Periods

A copy of the Public Notice is contained in Appendix E to this Explanatory Report.

8 Submissions dates

Written submissions or observations on the proposed development, with respect to the proper planning and sustainable development of the area in which the development will be carried out, may be made in writing to:

iludlow@waterfordcouncil.ie

or

**Ian Ludlow,
Staff Officer,
Active Travel
Waterford City and County Council,
The Mall,
Waterford.**

to be received on or before **4 p.m. Tuesday 28th of June 2022**

Submissions should be clearly marked **Submission Part 8 Newtown Hill.**

APPENDIX A – DRAWINGS

APPENDIX B – Pre part 8 report



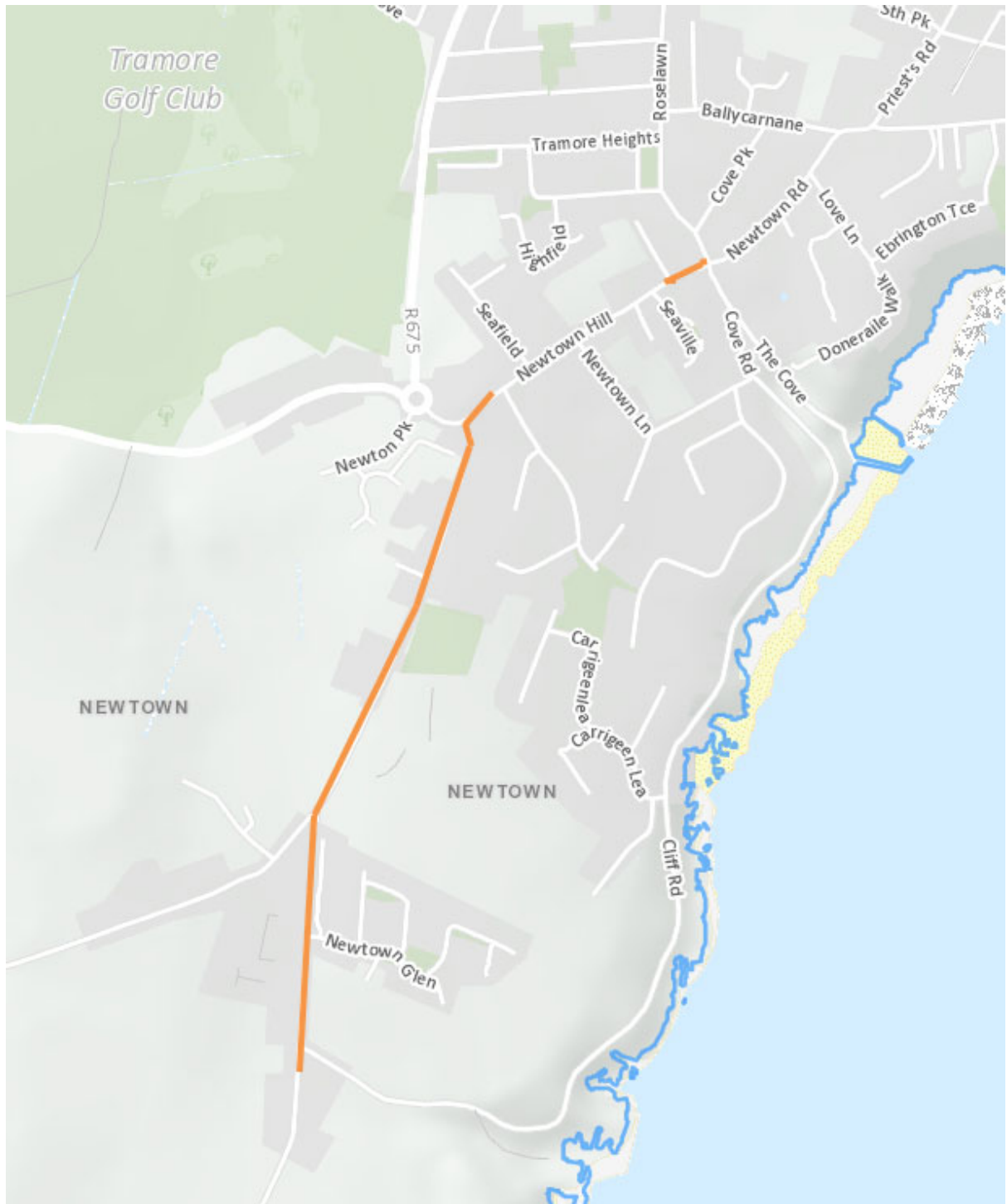
Comhairle Cathrach & Contae Phort Láirge
Waterford City & County Council

LOCAL AUTHORITY WORKS PART 8

PRE-PART 8 PLANNING ASSESSMENT

Description of Development the Subject of Part 8

To carry out a pedestrian and cycle improvement scheme along Newtown Hill and Newtown Glen in Tramore as shown in Figure 1.1 below comprising of the narrowing of the existing carriageway and provision of new and upgraded pedestrian and cycle facilities within the scheme extents.



Purpose of the Scheme

The purpose of the scheme is to prioritise pedestrian and cycle movements over vehicles and to provide a safer and more attractive connection between the three primary schools, the secondary school, sports ground, Caravan & Camping Park, and the numerous housing estates along the scheme extents. The proposed works will address a number of characteristics of the current road network which act as impediments to the delivery of more sustainable modes of transport such as;

- The width of Newtown Hill and Newtown Glen road varies from 8.9m to 11.3m which are conducive to the development of inappropriate speed.
- There are a lack of adequate pedestrian crossings along Newtown Hill and Newtown Glen.
- The existing footpath widths are narrow in places and may not be able to accommodate two pedestrians passing one another.
- There are no cycle facilities along the entire length of the scheme.
- There is a primary school, one secondary school, a sports ground, Caravan & Camping Park, and several housing estates within the 1.5km radius. The existing pedestrian and cycle facilities are not sufficient to cater for the pedestrian and cycle flows to and from these developments.

Planning Policy

Waterford County Development Plan 2011-2017, as amended and extended

The following policies and objectives are contained with the Waterford County Development Plan 2011-2017, as amended and extended. The currently proposed pedestrian and cycling infrastructure upgrades along the Newtown Hill and Newtown Glen- are in keeping with and aid in delivery of these policies and objectives.

Policy INF 14 *“To implement the smarter travel policy framework as produced by the Department of Transport and to encourage the sustainable creation of cycle and pedestrian friendly communities through the provision of cycle paths and other initiatives to curtail the dependency on private motor vehicles whilst seeking to minimise the depletion of the hedgerow resource that could potentially arise from cycle path provision.*”

Objective INF 5 “It is the objective of the Council to support the policies of the ‘National Cycle Policy Framework 2009-2020 Smarter Travel’, Department of Transport, April 2009 while ensuring that any environmental effects of the implementation of the policies are fully assessed and adequately mitigated”.

Objective INF 6 “It is the objective of the Council to promote the sustainable development of safe and convenient pedestrian and cycling facilities in the towns and villages, to minimise the dependence on private motor vehicles, and to encourage an active and healthy lifestyle. New and upgraded road developments will be encouraged to integrate cycle lanes. These will include urban/village developments and short distance routes”.

Policy INF 15 “The Council encourages a high quality of design and layout proposals within urban areas, which strive for universal accessibility for pedestrians, to provide adequate and convenient access to public transport and reduce the dependence on the private motor car”.

Tramore Local Area Plan 2014-2020

The Tramore Local Area Plan contains the following policies and objectives;

Policy INF 1 “To implement the smarter travel policy framework as produced by the Department of Transport and to encourage the sustainable creation of cycle and pedestrian friendly communities through the provision of cycle paths and other initiatives to curtail the dependency on private motor vehicles whilst seeking to minimise the depletion of the hedgerow resource that could potentially arise from cycle path provision”.

Policy INF 2 “Ensure that cycle lanes are provided throughout the Town, where possible on new roads and that designated cycle bays are provided for as part of new retail/commercial/office type developments”.

Objective INF 1 “It is the objective of the Council to support the policies of the ‘National Cycle Policy Framework 2009-2020 Smarter Travel’, Department of Transport, April 2009 while ensuring that any environmental effects of the implementation of the policies are fully assessed and adequately mitigated or avoided”.

Objective INF 2 *“It is the objective of the Council to promote the sustainable development of safe and convenient pedestrian and cycling facilities in the Town, to minimise the dependence on private motor vehicles, and to encourage an active and healthy lifestyle. New and upgraded road developments will be encouraged to integrate cycle lanes”.*

The proposed works to develop pedestrian and cycling infrastructure upgrades at Newtown, Tramore, do not materially contravene the policies and objectives of the Waterford County Development Plan 2011-2017, as amended and extended nor the policies and objectives of the Tramore Local Area Plan. The proposed works will assist in the delivery of more sustainable modes of travel and the delivery of the policies and objectives of the Waterford County Development Plan 2011-2017, as amended and extended and those of the Tramore Local Area Plan in relation to same.

Environmental Impact Assessment (E.I.A.)

The proposed works to develop pedestrian and cycling infrastructure upgrades at Newtown, Tramore are not of a type of development included for under Schedule 5 of the Planning and Development Regulations 2001, as amended. Based on the information submitted, consideration has been given to the nature, size and location of the proposed development in the context of the criteria set out in Schedule 7 to the 2001 Regulations and it has been determined that Environmental Impact Assessment is not required.

Built Heritage

The site does not contain or impact on a protected structure or an Architecture Conservation Area and as such there are no issues relating to built heritage.

Habitats Directive

A Habitats Directive Screening Assessment was carried out by the Heritage Office and forms part of this assessment. The findings of the assessment are summarised herein.

There is no direct hydrological connectivity between the route of the proposed cyclepath and the Backstrand. Surface water will discharge to existing drainage network. The works will not incur loss of habitat from the

ecological footprint of the SAC or SPA. Due to buffer distance between the site development location and the SAC and SPA boundary which comprises mudflat habitat at its western boundary there is no potential for significant effects on the conservation objective for the qualifying interest habitat at this location i.e. the works will not contribute to a decrease in the permanent area of mudflat habitat subject to natural processes and will not affect the extent of *Zostera* dominated community in this part of the SAC and will not cause disturbance to feeding or roosting areas of qualifying bird interests of the SPA.

Conclusion statement – there is no potential for significant effects on the conservation objectives of Tramore Backstrand SAC and SPA, and as such no further assessment required, thus the project can be screened out for Appropriate Assessment.

Flood Risk Assessment (F.R.A.).

The proposed works are not within a flood zone as identified by the Office of Public Works, the works will develop pedestrian and cycling infrastructure upgrades at Newtown, Tramore. Surface water will continue to discharge to the existing drainage network, the proposed works will not pose a flood risk or negatively impact on existing surface water disposal.

Part 8 Works

The proposed works constitute development to which Part 8 of the Planning and Development Regulations 2001 (as amended) applies. The proposed works are in accordance with Article 80(1) of the Planning and Development Regulations 2001(as amended) being works which involve;

“The construction of a new road or the widening or realignment of an existing road, where the length of new road or of the widened or realigned road in an urban area is 100 metres or more or in the case of a rural road is 1 kilometre or more”.

Hazel O’Shea

Senior Executive Planner

11th May 2022

APPENDIX C – Habitats Directive Project Screening Assessment

Habitats Directive Project Screening Assessment

Table 1: Project Details

Development Consent Type	Part 8 Local Authority Development
Development Location	Tramore- Newtown
File Ref	
Description of the project	Cycle and Pedestrian Facilities Improvement Scheme along Newtown.

Table 2: Identification of Natura 2000 Sites (SACs and SPAs) which may be Impacted by the proposed development

Please answer the following five questions in order to determine whether there are any Natura 2000 sites which could potentially be impacted by the proposed development.

Impacts on SACs		
1	<p>Impacts On Freshwater Habitats <i>Is the development within a Special Area of Conservation whose qualifying interests include freshwater habitats, or in the catchment of same?</i></p> <p>Sites to consider: Blackwater River, Lower River Suir Habitats to consider: Rivers, Lakes and Lagoons</p>	N
2	<p>Impacts On Wetland Habitats <i>Is the development within a Special Area of Conservation whose qualifying interests include wetland habitats, or within 1 km of same?</i></p> <p>Sites to consider: Comeragh Mountains Habitats to consider: Bogs, Fens, Marshes and Wet Heaths.</p>	N
3	<p>Impacts on Intertidal and Marine Habitats <i>Is the development located within a Special Area of Conservation whose qualifying interests include intertidal and/or marine habitats and species, or within the catchment of same.</i></p> <p>Sites to consider: Tramore Dunes and Backstrand, River Suir (Tidal Section), River Blackwater (Tidal Section), Waterford Estuary Habitats to consider: Mudflats, Sandflats, Saltmarsh, Estuary; Shingle, Reefs, Sea Cliffs.</p>	Y Tramore Backstrand
4	<p>Impacts On Woodlands , Grasslands and Dry Heaths <i>Is the development within a Special Area of Conservation whose qualifying habitats include woodlands or grasslands habitats, or within 200m of same.</i></p> <p>Sites to consider: Glendine Wood Nire Valley Woods, Ardmore Head, Helvick Head Habitats to consider: Woodlands, Grasslands or Dunes.</p>	N
5	<p>Impacts On Birds <i>Is the development within a Special Protection Area, or within 1 km of same.</i></p> <p>Sites to consider: Tramore Backstrand, Dungarvan Bay, Blackwater Callows, Blackwater Estuary, Helvick Head –Ballyquin Coast, Mid Waterford Coast</p>	Y Tramore Backstrand

Conclusion Table 2:

If the answer to all of these questions is **No**, significant impacts can be ruled out for Natura 2000 sites. No further assessment is required, proceed to the Habitats Directive Conclusion Statement.

If the answer to any of these questions is **Yes** please refer to tables 3 and 4 below.

Table 3: Determination of Possible Impacts On Natura 2000 Sites.

Where it has been identified that there is a Natura 2000 site within the potential impact zone of the proposed development, it is necessary to try to determine the nature of the possible impacts. Please answer the following questions as appropriate.

1	Impacts on designated freshwater habitats (rivers, lakes streams and lagoons).	
	Sites to consider: Blackwater River, Lower River Suir	
	<i>Please answer the following if the answer to question 1 in table 2 was yes.</i>	
	<i>Does the development involve any of the following:</i>	
	Works inside the boundary of designated site	
1.1	All works within the boundary of any SAC whose qualifying features include freshwater habitats/species, excluding small extensions/alterations to existing buildings.	
	Works outside the boundary of designated site	
1.2	Discharge to surfacewater or groundwater within the boundary of an SAC whose qualifying features include freshwater habitats/species.	
1.3	Abstraction from surfacewater or groundwater within 1km of the boundary of an SAC whose qualifying features include freshwater habitats or species.	
1.4	Removal of topsoil within 100m of the boundary of an SAC, whose qualifying features include freshwater habitats/species.	
1.5	Infilling or raising of ground levels within 100m the boundary of any SAC whose qualifying features include freshwater habitats/species.	
1.6	Construction of drainage ditches within 1km of the boundary of an SAC whose qualifying features include freshwater habitats/species.	
1.7	Installation of waste water treatment systems; percolation areas; septic tanks within 100 m of the boundary of an SAC site whose qualifying features include freshwater habitats/species.	
1.8	Construction within a floodplain of EU designated watercourse whose qualifying features include freshwater habitats/species.	
1.9	Crossing or culverting of rivers or streams within 1km of the boundary of any SAC whose qualifying features include freshwater habitats.	
1.10	Storage of chemicals hydrocarbons or organic wastes within 100 m of the boundary of an SAC whose qualifying features include freshwater habitats/species.	
1.11	Development of a large scale, within catchment of an EU designated watercourse or waterbody, which involves the production of an EIS.	
1.12	Development or expansion of quarries within catchment of an EU designated watercourse or waterbody.	

1.13	Development or expansion of windfarms within catchment of an EU designated watercourse or waterbody.	
1.14	Development of pumped hydro electric stations within catchment of an EU designated watercourse or waterbody.	
2	<p>Impacts On Wetland Habitats <i>Is the development within a Special Area of Conservation whose qualifying interests include wetland habitats, or within 1 km of same?</i></p> <p>Sites to consider: Comeragh Mountains</p> <p>Habitats to consider: Bogs, Fens, Marshes and Wet Heaths.</p> <p><i>Please answer the following if the answer to question 2 in table 2 was yes.</i></p>	
	Works inside the boundary of designated site	
2.1	All works within the boundary of an SAC whose qualifying features include heath, marsh, fen or bog, excluding small extensions/alterations to existing buildings.	
	Works outside the boundary of designated site	
2.2	Construction of roads or other infrastructure on peat habitats within 1km of any SAC whose qualifying features include heath, marsh, fen or bog.	
2.3	Development of a large scale within 1km of any SAC, whose qualifying features include heath, marsh, fen or bog, which involves the production of an EIS.	
3	<p>Impacts on Intertidal and Marine Habitats <i>Is the development located within a Special Area of Conservation whose qualifying interests include intertidal and/or marine habitats and species, or within the catchment of same.</i></p> <p>Sites to consider: Tramore Dunes and Backstrand, River Suir (Tidal Section), River Blackwater (Tidal Section), Waterford Estuary</p> <p><i>Please answer the following if the answer to question 1 in table 3 was yes.</i></p>	
	Works inside the boundary of designated site	
3.1	All works within the boundary of any SAC whose qualifying features include intertidal or marine habitats, excluding small extensions/alterations to existing buildings.	N
	Works outside the boundary of designated site	
3.2	Coastal protection works within 5km of any SAC whose qualifying features include intertidal or marine habitats.	N
3.3	Development of piers, slipways, marinas, pontoons or any other infrastructure within 5km of any SAC whose qualifying features include intertidal or marine habitats.	Y
3.4	Dredging within 5km of any SAC whose qualifying features include intertidal or marine habitats.	N
3.5	Works within 1km of any SAC whose qualifying features include intertidal or marine habitats, which will result in discharges to rivers or streams directly connected to the designated site.	N No direct hydrological connectivity between cyclepath and Backstrand.
3.6	Infilling of coastal habitats within 500m of any SAC whose qualifying features include intertidal or marine habitats.	N

3.7	Removal of topsoil or infilling of terrestrial habitats within 100m of any SAC whose qualifying features include intertidal or marine habitats.	N
3.8	Development of a large scale within 1km of any SAC whose qualifying features include intertidal or marine habitats, which involves the production of an EIS.	N
4	<p>Impacts on other designated woodlands and grasslands (woodland, upland grassland, lowland grassland, coastal grassland including dunes).</p> <p>Sites to consider: Glendine Wood Nire Valley Woods, Ardmore Head, Helvick Head <i>Please answer the following if the answer to question 4 in table 2 was yes.</i></p> <p><i>Does the development involve any of the following:</i></p> <p>Works inside the boundary of designated site</p>	
4.1	All works within the boundary of any SAC whose qualifying interests include woodland or grassland habitat types excluding small extensions/alterations to existing buildings.	
	Works outside the boundary of designated site	
4.2	Development within 200m of any SAC whose qualifying interests include woodland or grassland habitat types.	
4.3	Development of a large scale within 1km of any SAC, whose qualifying interests include woodland or grassland habitat types, which involves the production of an EIS.	
5	<p>Impacts on birds in SPAs</p> <p>Sites to consider: Tramore Backstrand, Dungarvan Bay, Blackwater Callows, Blackwater Estuary, Helvick Head –Ballyquin Coast, Mid Waterford Coast <i>Please answer the following if the answer to question 5 in table 2 was yes.</i></p> <p><i>Does the development involve any of the following:</i></p> <p>Works inside the boundary of designated site</p>	
5.1	All works within the boundary of any SPA excluding small extensions/alterations to existing buildings.	N
	Works outside the boundary of designated site	
5.2	Erection of wind turbines within 1km of any SPA.	N
5.3	All construction works within 100m of any SPA.	N
5.4	Infilling of coastal habitats within 500m of intertidal SPA.	N
5.5	Works within 1km of coastal/wetland SPAs which will result in discharges to rivers or streams that are directly connected to designated sites.	N No direct hydrological connectivity between cyclepath and Backstrand.
5.6	Development of cycleways or walking routes within 100m of SPAs.	>500m
5.7	Construction works on feeding areas adjacent to SPAs	N

Conclusion Table 3: If the answer to all of the above is no or n/a, significant impacts on Natura 2000 sites can be ruled out. No further assessment is required, proceed to the Screening Conclusion Statement. If the answer to any question in table 3 is yes, you may require further information, unless you are satisfied that the project proponents have incorporated adequate mitigation into their design to avoid impacts on the Natura 2000 site (e.g. water pollution protection measures). Such information

should be provided in the form of a Natura Impact Statement which should address the particular issues of concern as identified through the above.

Table 4: Consideration of Potential Impacts on Protected Species

Many of our Special Areas of Conservation are designated for species as well as for habitats. These are listed below, alongside the sites for which they are designated. Included is a short list of the types of activities which could have an impact on these species. Please tick if you are concerned that the proposed development could have an impact on these species.

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified? Y/N
Otter	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with river banks.	N
Bats (all species outside designated sites)	Blackwater River, Lower River Suir, Waterford Estuary Glendine Wood, Lismore Woods Nire Valley Woods Along with above, in general all sites with any of the following; woods, mature treelines and hedgerows, old buildings and bridges	Activities that result in loss of woodland or hedgerow habitat or causes disturbance to roost sites. Renovations of old buildings; Repointing of old bridges.	N
Salmon	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality, levels or the river bed;	N
River Lamprey	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality, levels or the river bed;	N
Brook Lamprey	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality, levels or the river bed;	N
Sea Lamprey	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality or the river bed – estuarine areas;	N
Twaite Shad Allis Shad	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality or the river bed – estuarine areas;	N
White-clawed Crayfish	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality or the river bed;	N
Freshwater Pearl Mussel	Lower River Suir River Clodiagh River Lickey River Blackwater	Activities that interfere with water quality, levels or the river bed ;	N
Whorled Snail <i>Vertigo moulinsiana</i>	River Blackwater	Activities that result in loss of fen, marsh or wet grassland habitat within or close to the SAC.	N
Killarney Fern	Glendine Wood Lismore Woods (River Blackwater)	Woodland clearance or other activities resulting in loss or disturbance to woodland habitat within the relevant SACs.	N

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified? Y/N
Chough	Mid-Waterford Coast(Fen-Ballyvoyle) Ballyquin- Helvick Head Coast	Activities that result in loss of grassland habitat within or close to the SPA. Activities that have potential to cause disturbance to nesting areas.	N

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified? Y/N
Peregrine Falcon	Mid-Waterford Coast(Fenor-Ballyvoyle) Ballyquin- Helvick Head Coast	Activities that have potential to cause disturbance to nesting areas.	N
Herring Gull	Mid-Waterford Coast(Fenor-Ballyvoyle) Ballyquin- Helvick Head Coast	Activities that interfere with water quality. Activities that have potential to cause disturbance to nesting areas.	N
Cormorant	Mid-Waterford Coast(Fenor-Ballyvoyle) Ballyquin- Helvick Head Coast	Activities that cause reduction in water quality. Activities that have potential to cause disturbance to nesting areas.	N
Kittiwake	Ballyquin- Helvick Head Coast	Activities that have potential to cause disturbance to nesting areas .	
Whooper Swan	Blackwater Callows	Activities that result in loss of grassland habitat within or close to the SPA. Activities that cause disturbance to roosting or foraging areas. Activities that increase collision risk.	
Light-bellied Brent Goose	Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas. Activities that result in loss of grassland habitat within or close to the SPA. Activities that increase collision risk.	N
Wigeon	Blackwater Callows Blackwater Estuary	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Teal	Blackwater Callows	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Black-tailed Godwit	Blackwater Callows Blackwater Estuary Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Bar-tailed Godwit	Blackwater Estuary Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Golden Plover	Blackwater Estuary Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Grey Plover	Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Oystercatcher	Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Lapwing	Blackwater Estuary Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Dunlin	Blackwater Estuary Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified? Y/N
Knot	Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Turnstone	Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Curlew	Blackwater Estuary Dungarvan Harbour Tramore Back Strand	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	N
Redshank	Blackwater Estuary Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Great Crested Grebe	Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Shelduck	Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	
Red-breasted Merganser	Dungarvan Harbour	Activities that cause reduction in water quality. Activities that cause disturbance to roosting or foraging areas.	

Conclusion Table 4: If the answer to all of the above is no, significant impacts on species can be ruled out. If the answer to any of the above is yes, then further information is likely to be required in relation to potential for impact on that particular species. Where potential impacts on the above listed species are within designated sites, then further information should be sought in the form of a Natura Impact Statement. Where impacts are outside designated sites, then a species specific survey should be requested.

Habitats Directive Screening Conclusion Statement

Development Type	Part 8 Local Authority Development
Development Location	Tramore-Newtown
Natura 2000 sites within impact zone	Tramore Back Strand SAC and SPA
Planning File Ref	
Description of the project	
Cycle and Pedestrian Facilities Improvement Scheme along Tramore Link Road R675 and Newtown.	
Describe how the project or plan (alone or in combination) could affect Natura 2000 site(s)	
Surface water run off from increased built surfaces and discharge to Backstrand.	
If there are potential negative impacts, explain whether you consider if these are likely to be significant, and if not, why not.	
<p>There is no direct hydrological connectivity between the route of the proposed cyclepath and the Backstrand. Surface water will discharge to existing drainage network. The works will not incur loss of habitat from the ecological footprint of the SAC or SPA. Due to buffer distance between the site development location and the SAC and SPA boundary which comprises mudflat habitat at its western boundary there is no potential for significant effects on the conservation objective for the qualifying interest habitat at this location i.e. the works will not contribute to a decrease in the permanent area of mudflat habitat subject to natural processes and will not affect the extent of Zostera dominated community in this part of the SAC and will not cause disturbance to feeding or roosting areas of qualifying bird interests of the SPA.</p>	
Conclusion of assessment	
No potential for significant effects on the conservation objectives of Tramore Backstrand SAC and SPA, no further assessment required.	
Documentation reviewed for making of this statement.	
WCCC internal GIS Conservation Objectives Supporting Document for Tramore Backstrand SAC	
Completed By	Bernadette Guest
Date	14 th February 2022

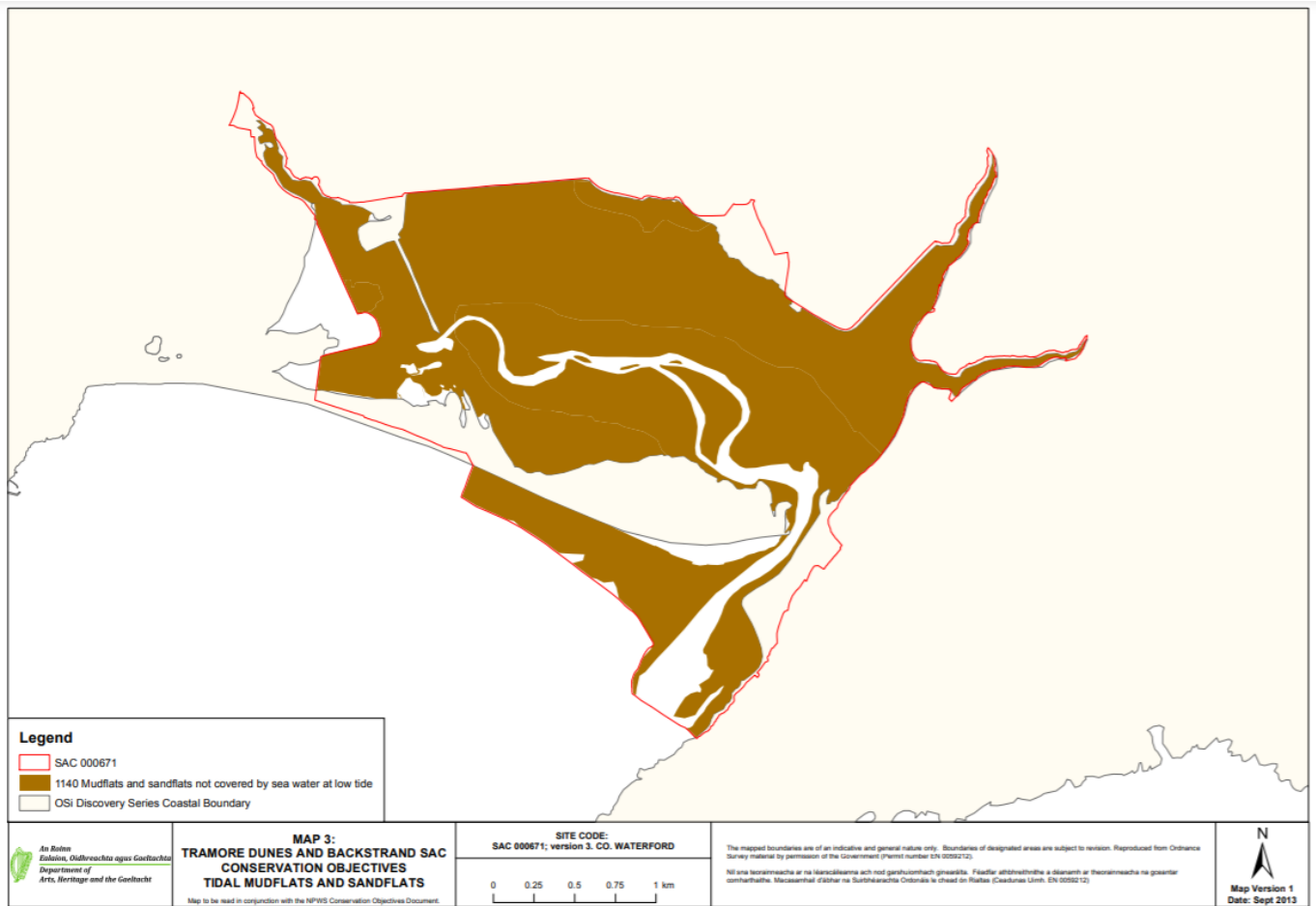
Conservation Objectives for : Tramore Dunes and Backstrand SAC [000671]

1140 Mudflats and sandflats not covered by seawater at low tide

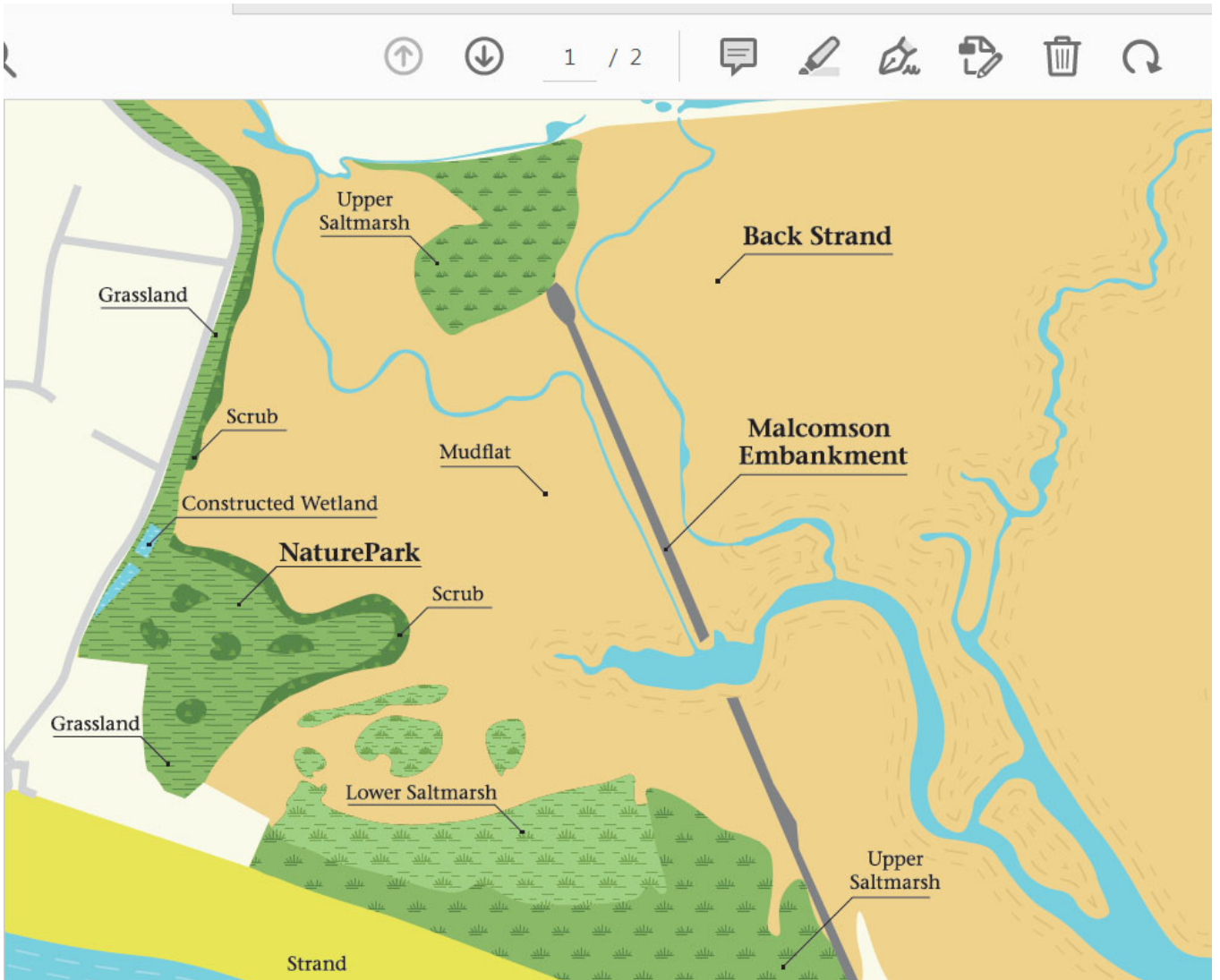
To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in Tramore Dunes and Backstrand SAC, which is defined by the following list of attributes and targets:

Attribute	Measure	Target	Notes
Habitat area	Hectares	The permanent habitat area is stable or increasing, subject to natural processes. See map 3	Habitat area was estimated using OSi data as 548ha
Community extent	Hectares	Maintain the extent of the <i>Zostera</i> -dominated community, subject to natural processes. See map 4	Based on an intertidal survey undertaken in 2008 (ASU, 2008). See marine supporting document for further information
Community structure: <i>Zostera</i> density	Shoots/m ²	Conserve the high quality of the <i>Zostera</i> -dominated community, subject to natural processes	Based on an intertidal survey undertaken in 2008 (ASU, 2008). See marine supporting document for further details
Community distribution	Hectares	Conserve the following community types in a natural condition: Intertidal fine sand with <i>Bathyporeia pilosa</i> and <i>Nephtys cirrosa</i> community; Intertidal muddy sand with <i>Pygospio elegans</i> and <i>Tubificoides benedii</i> community complex. See map 4	Based on an intertidal survey undertaken in 2008 (ASU, 2008). See marine supporting document for further details

NPWS (2013) Conservation Objectives: Tramore Dunes and Backstrand SAC 000671. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.



NPWS (2013) Conservation Objectives: Tramore Dunes and Backstrand SAC 000671. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.



Habitat Map of Western area of Tramore Backstrand SAC.

APPENDIX D – Submissions Overview and Responses

The Part VIII scheme was advertised from 17th May 2022 to 15th June 2022, inviting submissions before 28th June 2022.

The following submissions were received during that period:

Submission No. 1 – Ann Nolan

This submission refers to the entrance junction to Newtown Rise from Newtown. Ann is a local resident and is concerned that an accident will happen at this junction. She would like to see this junction made safer.

Response to Submission No. 1

The Junction is proposed to be altered with set-backs to the eastern side in order to improve pedestrian facilities. Lands to the west of the junction are not available for set-back. Detailed Design Stage to follow will seek to further improve the junction where possible.

Submission No. 2 – John & Chris Betts

This submission raises concerns that this particular scheme will be at the cost of some important habitats of the woodland area. It also asks if environmental screening was only carried out on SACs/SPAs in the area (and not the existing woods). Other concerns raised include light and noise pollution, and increased footfall through the woods which will impact on its biodiversity; plant life, bats and birds. The submission also refers to hedge cutting which has been carried out during the nesting season.

Response to Submission No. 2

Newtown Woods is listed as a key biodiversity site in the Tramore Local Area Plan 2014-2020.

Policy GI 2 of the Plan states it is a policy of this plan to protect and encourage the creation of sites of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as tree corridors, hedgerows, earth banks and wetlands.

A tree survey of location, number of trees and species shall be carried out to inform the proposed works. Any trees that require removal to facilitate the route will be mitigated by a replacement factor of three trees for each tree removed.

A bat survey has been completed to establish bat usage for commuting and foraging. The findings of this report will be considered at detail designed stage and during construction. There will be no significant impact on the bat habitat following implementation of the scheme and proposed mitigation measures.

Lighting schemes shall avoid direct spill on to the woodland and will be designed in accordance with a wildlife friendly lighting specification informed by NPWS Bat Mitigation Guidelines 2021.

The proposal is subthreshold for EIA and an EIAR was not required. AA Screening was carried out to assess impacts on the Natura 2000 Network – Tramore Dunes and Back Strand SAC and SPA and the Mid Waterford Coast SPA and concluded no potential for significant effects on the qualifying interests of the Natura 2000 Network. Newtown Woods is not designated a SAC or SPA.

Hedge cutting is guided by Section 46 of the Wildlife (Amendment) Act and prohibited between March 1st and August 31st subject to derogations including:

“(e) the clearance of vegetation in the course of road or other construction works or in the development or preparation of sites on which any building or other structure is intended to be provided;”

Submission No. 3 – Clare Scott

This submission raises concerns in relation to the lack of EIA and/or other surveys for Newtown Woods. It also cites a lack of detail in relation to public lighting, the old boundary wall and excavations at Newtown Woods.

Clare would like to see:

- A properly focused environmental survey in co-operation with interested members of the community to benchmark this vital habitat.
- A ring fencing of Newtown Woods as an important environmental resource for our heritage and community wellbeing.
- Street lighting limited to the entrance of the housing development and not to continue down the road by or through the woods.
- The containing wall to remain.
- One way system is scrapped.

Response to Submission No. 3

The proposal is subthreshold for EIA and an EIAR was not required. AA Screening was carried out for impacts on the Natura 2000 Network – Tramore Dunes and Back Strand SAC and SPA and the Mid Waterford Coast SPA and concluded no potential for significant effects on the qualifying interests of the Natura 2000 Network. Newtown Woods is not designated a SAC or SPA.

A bat survey has been completed to establish bat usage for commuting and foraging. The findings of this report will be considered at detail designed stage and during construction. There will be no significant impact on the bat habitat following implementation of the scheme and proposed mitigation measures.

Newtown Woods is listed as a key biodiversity site in the Tramore Local Area Plan 2014-2020. Policy GI 2 states it is a policy of this plan to protect and encourage the creation of sites of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as tree corridors, hedgerows, earth banks and wetlands. A tree survey of location, number of trees and species shall be carried out to inform the proposed works. Any trees that require removal to facilitate the route will be mitigated by a replacement factor of three trees for each tree removed.

Public lighting will be provided as part of the proposed development and will be designed during the Detailed Design Stage to follow. Design of lighting will take account of the environment associated with same.

The existing stonework wall is proposed to be retained and enhanced.

Works proposed end at the Newtown Glen Road, no alterations to existing layout are proposed to the Cliff Road.

Submission No. 4 – Derek O'Donnell

This submission raises concerns over the proposed shared space for pedestrians and cyclists, suggesting that a segregated cycle lane would be more attractive as an option for cycling.

Derek also seeks clarification on whether the path joining up with the cul de sac is a drawing error and if the existing berm with trees and plants has been omitted as a drawing error at Section 6 – 6.

The submission also requests that the original verge be reinstated opposite the caravan park and that the road be resurfaced as part of the works.

Response to Submission No. 4

Shared spaces will be further detailed in the Detailed Design Stage.

Commencement of the shared surface at this location will be further detailed in the Design Stage to follow and tie-in requirements to the Cliff Road.

Re: the existing berm in place adjacent to the public road edge in the vicinity of section 6-6 is proposed to be removed and replaced with a grassed verge area as shown. The outer existing hedgerow to Newtown Rise Estate will remain in place (not shown on section 6-6).

Submission No. 5 – Dónal Toolan

This submission welcomes the proposed improvements to walking/cycling in the area, however, raises the following queries about the scheme:

- Will the existing boundary stone wall at Newtown Wood be retained?
- Will the bank be removed or retained between the road and footpath opposite the caravan park?
- What lighting is proposed at Newtown Woods (type/height)?

Response to Submission No. 5

Yes, the existing stone wall from Ch 920 to 1065 will be maintained and upgraded.

Yes, the existing bank/earth mound opposite the caravan park will be removed and replaced with a grassed verge area.

Public lighting will be provided as part of the proposed development and will be designed during the Detail Design Stage to follow. Design of lighting will take account of the environment associated with same

Submission No. 6 – Gas Networks Ireland

This submission highlights the existing gas network in the area and recommends that a current gas network map (or maps) must always be kept on site while work is under way.

Response to Submission No. 6

We confirm that the above is duly noted.

Submission No. 7 – Gerard O’Riordan

This submission raises a concern that the proposed Lighting will disturb the natural wildlife fauna.

Response to Submission No. 7

Public lighting will be provided as part of the proposed development and will be designed during the Detailed Design Stage to follow. Design of lighting will take account of the environment associated with same.

Submission No. 8 – Irish Water

This submission highlights the existing water network in the area and requests that any conditions applied to planning permission should include:

1. The applicant must engage with Irish Waters Diversions Team prior to commencement of any works to apply for a build over/near application to ensure the appropriate protection of any assets during construction phases of the proposed development.
2. Layouts drawing showing the proposal cycle route and existing IW mains must be submitted to Irish Waters Diversions Team prior to commencement of works.
3. Applicant must confirm onsite the location and cover level of the existing IW mains to Irish Waters Diversions Team prior to commencement of works.
4. Cross section drawing showing the proposal cycle route/footpath and existing IW mains shall be submitted to Irish Waters Diversions Team prior to commencement of works.
5. Method statement for the construction works and how applicant will protect the existing mains during the construction works must be submitted to Irish Waters Diversions Team prior to commencement of works.
6. Irish Water does not permit any build over of its assets, any proposals by the applicant to divert or build over existing water or wastewater services shall be submitted to Irish Water for written approval prior to works commencing.
7. Separation distances between the existing Irish Water assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details.
8. All development shall be carried out in compliance with Irish Water Standards codes and practices.

Response to Submission No. 8

We confirm that the above is duly noted.

Submission No. 9 – John & Sarah Good

This submission requests that the existing waiting area opposite the caravan park be retained as it has improved traffic disruption due to caravans/motor homes waiting outside of the main carriageway. There is also a request for the addition of a kerb on the Western side of the carriageway between Newtown Glen and Newtown Cove Caravan Park to prevent the carriageway widening over time. The submission also requests that the lighting at the proposed pedestrian crossing near the caravan park be installed in such a fashion as to stop the lights shining into their personal residence and that the lights be subdued as their proposed location is right next to their bedrooms.

Response to Submission No. 9

We note that works have been carried out in this area post Part 8 advertising that takes account of the 'holding' area outside the caravan park. We aim to facilitate both the proposed scheme and existing waiting area at Detail Design stage.

Design for kerbing will be reviewed at Detail Design stage to follow.

Pedestrian crossing lighting can be suitably shielded and concentrated to crossing areas and approaches.

Submission No. 10 – Kevin Murphy

This submission queries whether the existing hedge is to be retained at Newtown Glen. As the drawing shows a grass verge at this location, Kevin would like clarification as to what the plan is for the hedge.

Response to Submission No. 10

The existing berm in place adjacent to the public road edge in the vicinity of Newtown Rise Estate is proposed to be removed and replaced with a grassed verge area as shown. The outer existing hedgerow / screening to Newtown Rise Estate will remain in place. This is not shown on section 6-6.

Submission No. 11 – Kevin Sutton

This submission welcomes the scheme; however, it raises concerns over the existing junction at Newtown Rise/Newtown Hill and suggest that reducing the carriageway width may add to the existing danger at this junction.

Response to Submission No. 11

The carriageway is not being narrowed at this location. Junction is proposed to be altered with set-backs to the eastern side in order to improve pedestrian facilities. Lands to the west of the junction are not available for further set-backs. Detailed Design Stage to follow will seek to further improve the junction where possible and where funding supports such measures.

Submission No. 12 – Laura Cassin

This submission welcomes the scheme; however, it raises concerns over the proposed raised crossing location and the impact of position/noise/light from same on the adjoining property. There is also a concern that increased footfall along the existing ditch of the property may erode the ditch.

Response to Submission No. 12

Raised pedestrian crossing will be detailed at Detail Design Stage to follow.

Any works on existing boundaries will be assessed at detailed Design Stage to follow and landowner's concerns are noted.

Submission No. 13 – Mary Newell

This submission seeks clarification as to if the existing mature trees behind the stone wall on Newtown Cove will be affected by the proposed scheme.

Response to Submission No. 13

Curtilment and removal of some trees will be required in order to provide the footway as proposed. Any trees that require removal to facilitate the route will be mitigated by a replacement factor of three trees for each tree removed.

Submission No. 14 – Maurice Hickey

This submission, although not directly related to the scheme queries whether the existing ramps will remain as they are or improved.

Response to Submission No. 14

Existing ramps will remain in place.

Submission No. 15 – Maurice Foran & Miranda Jones

This submission welcomes the scheme and requests that consideration be given to providing car parking bays at the existing bus stop and also for measures to be implemented for traffic turning right at the top of Newtown Hill.

Response to Submission No. 15

It would not be possible to provide parking bays at this location.

There are no plans to introduce right turning lanes as part of the scheme. The raised table proposed to Newtown Hill junction will be an added safety feature to the junction.

Submission No. 16 – Noel Kelly

This submission welcomes the scheme and enquires if the road itself will be resurfaced as soon as possible once the works on the paths have been completed.

Response to Submission No. 16

It is not under the remit of this scheme to provide surfacing to remaining existing roads as funding is not available for same. It would be hoped that post these works that surfacing works can be undertaken in the near future.

Submission No. 17 – Peter Hughes

Peter's property is subject to possible accommodation works to facilitate the scheme. This involves removing the existing stone wall and rebuilding same, set back into his property.

Peter is concerned about the potential cost and quality of the new wall and suggests that the road could be re-aligned to the opposite side of the road to his property where there is sufficient space.

Peter is a regular cyclist and overall welcomes the scheme.

Response to Submission No. 17

Maintaining the footpath to one side of the road is preferred rather than having excessive crossing over points.

Levels increase sharply off the road edge to opposite side of public road, making it increasingly difficult to install a footway and resultant alteration of landowner driveway entrances and boundary walls.

Further discussions with the homeowner will be required at detail design stage.

Submission No. 18/19 – Steven Clancy

These submissions welcome the scheme; however, they request that the road surface/drainage be addressed at the top of Newtown Hill.

Response to Submission No. 18/19

Works proposed will undergo detailed design at the Design Stage and effects on drainage will be addressed.

Submission No. 20 – Tom Power

This submission raises various observations from the cyclist's point of view in the area:

- When you come from Newtown Glen Road to the Newtown Hill Roundabout, how are cyclists to turn right towards The Coast Road or Fenor Road, as the cycle path is on the Right hand side of the road?
- When travelling along Newtown Glen the shared path disappears into a footpath , where is the cyclist to go?
- It does not state if the proposed cycle lanes are to be one way or two way.

Response to Submission No. 20

Newtown Roundabout and Ring Road is being developed as part of separate Part 8 Planning scheme. Works as proposed under this scheme will tie into the proposed Ring Road scheme.

Full design details will follow at Design Stage.

The proposed cycle lane terminates at the proposed crossing point. The cyclist can enter the carriageway safely on the correct traffic lane at this point.

The proposed cycle lanes are two way.

Submission No. 21 – Tramore Eco Group

This submission questions why no Ecological Assessment was carried out at Newtown Woods, instead only at nearby SPAs and SACs, referencing that there would be a considerable negative environmental impact on Newtown Woods if the scheme proceeds.

As part of the submission, the following requests are made:

- The low wall to be retained.
- Artificial light to shine on walkway/cycleway only and not into the woods, noting that light should shine down and not up.
- We request also that Newtown Woods be protected and conserved as it is, as one of the remaining areas of woodland in Tramore.

Response to Submission No. 21

The low wall is proposed to be retained and enhanced.

Public lighting will be provided as part of the proposed development and will be designed during the Design Stage to follow. Design of lighting will take account of the environment associated with same.

Newtown Woods is listed as a key biodiversity site in the Tramore Local Area Plan 2014-2020. Policy GI 2 of the Plan states it is a policy of this plan to protect and encourage the creation of sites of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as tree corridors, hedgerows, earth banks and wetlands.

A tree survey of location, number of trees and species shall be carried out to inform the proposed works. Any trees that require removal to facilitate the route will be mitigated by a replacement factor of three trees for each tree removed.

A bat survey has been completed to establish bat usage for commuting and foraging. The findings of this report will be considered at detail designed stage and during construction. There will be no significant impact on the bat habitat following implementation of the scheme and proposed mitigation measures.

Lighting schemes shall avoid direct spill on to the woodland and will be designed in accordance with a wildlife friendly lighting specification informed by NPWS Bat Mitigation Guidelines 2021.

The proposal is subthreshold for EIA and an EIAR was not required. AA Screening was carried out to assess impacts on the Natura 2000 Network – Tramore Dunes and Back Strand SAC and SPA and the Mid Waterford Coast SPA and concluded no potential for significant effects on the qualifying interests of the Natura 2000 Network. Newtown Woods is not designated a SAC or SPA.

Hedge cutting is guided by Section 46 of the Wildlife (Amendment) Act and prohibited between March 1st and August 31st subject to derogations including:

“(e) the clearance of vegetation in the course of road or other construction works or in the development or preparation of sites on which any building or other structure is intended to be provided;”

APPENDIX E – Submissions (original text)

Submission No. 1 – Ann Nolan

Hi Ian

I am a resident of Newtown Rise, Tramore. I have spent the last six years requesting that the dangerous entrance junction to Newtown Rise from Newtown Hill be addressed. There is currently no footpath access to Newtown Rise. Pedestrians and motorists have to exit Newtown Rise in a manner which can only be described as Hazardous. A vehicle exiting Newtown Rise finds itself immediately on the main roadway in the path of oncoming traffic. It is a blind exit. A driver cannot see nearside traffic coming down Newtown Hill until they are halfway onto the main road.. A ramp next to the exit serves little purpose. In reality cyclists and scooter users coming down Newtown Hill tend to go to the left side of the ramp where the effects of the ramp are much lessened. This action greatly decreases the chances of them being seen by vehicles exiting Newtown Rise. The case is that you are halfway onto the main road before you can see any other road users. The ramp is considered by some cyclists as a launching pad and I have seen too many "Close ones" at this stage. In addition there are school going children and elderly persons living in Newtown Rise. To witness their attempts to cross the road on a daily basis is heart stopping. It is also evident that many drivers coming down Newtown Hill appear to get a shock when they pass this junction as they had not seen or expected, despite road signage, to find a person standing at the junction or a vehicle inching its way out. I am amazed that a serious injury accident had not occurred at this junction beforehand. I implore that every effort is made to make this junction a safe place and not the Death trap that currently exists.

Thank you for the opportunity to air my opinion. .

Kind regards,

Ann

Submission No. 2 – John & Chris Bretts

Dear Mr. Ludlow,

We have been resident in Tramore for 26 years and are very aware of all its natural places within the town and its environs. Although we are very much in support of encouraging walking and cycling, we have some serious concerns that this particular scheme will be at the cost of some important habitats of the woodland area, at a time when our country, like most, is supposed to be committed to addressing climate change and biodiversity. This is particularly pertinent in this instance, as you must be aware that Tramore has the lowest tree count in the county, which itself has the lowest in the country. I quote from Minister Noonan's address to the National Biodiversity Conference 2022, held on 8th June "We're assessing ancient and long established woodlands and reviewing the mechanisms that contribute to their protection and conservation". So please, don't let Waterford Council, at this time, contribute to damage to one of our few stretches of woodland in Tramore - it's small enough as it is, but notably biodiverse, with a number of different habitats; I know that you have been sent some remarkable lists of plants, trees and birds present in or because of the woods.

Frankly, it beggars belief that the council's ecological assessment of the environmental impact takes into consideration nothing closer than about 3 kilometers from the site of the proposed development, and even dismissively states "... thus the project can be screened out for Appropriate Assessment". Did these

people even visit the actual site under consideration, or were they told specifically only to consider the SACs/SPAs?

We are also concerned about a housing development planned close by, which in combination with the proposal we are talking about here, will increase light and noise pollution and footfall through the woods themselves, all of which will impact on its biodiversity; plant life, bats and birds. Hedge and verge cutting witnessed close to the woods last week underlines the council's lack of consideration for some of our natural places, bordering, I suggest, to contempt. There are certainly employees within the council who are well informed about the environment, and there have been some very good and effective policies put in place, but I wonder sometimes whether various departments have opportunities to share their knowledge with each other. Are your contractors, for example, not made aware of the law concerning hedge cutting in the nesting season? Knowing about such recent destruction of important habitats gives no confidence whatever about the conduct of contractors assigned to this project.

Yours sincerely,
Jdohn and Chris Betts

Submission No. 3 – Clare Scott

A Chara,

I have a number of areas of concern around the Council proposals for the roads around Newtown Woods and they are linked to two larger concerns which I will mention first:

1. *Environmental Impact Assessments* The lack of inclusion of Newtown Woods itself in any EIA or other surveys. This is linked also to the unsuitability of the recommendations of the Waterford Council Heritage officer around preserving this fragile environment.

2. *Lack of clarity in the Council plans*

1. *EIA and other surveys for Newtown Woods.*

EIA for the Council's proposals (and most likely also for the developments at Newtown Glen and Carrigeenlea) do not take into account the local environment. The only areas mentioned as being surveyed for environmental impacts are the Tramore dunes and back strand 5km distant. Other areas mentioned are in the west of the county e.g. the Blackwater Valley. This is ridiculous and disingenuous. Newtown Woods is a very important habitat, deciduous woodlands are in an emergency situation. Newtown Woods must be properly surveyed for environmental impact - at the very least as a benchmark.

Any traffic surveys have not, as with the EIAs above, taken Newtown Woods into account. And, if any traffic surveys were done they were done without local consultation, in Westtown at least, which has seen a lot of negative change because of increased traffic. The one way system introduced in late 2021 means that all the traffic leaving Newtown Cove - which is not inconsiderable - is channelled up through the woods. Visitors to Newtown Cove have swelled through lockdown and will increase more with the added developments. This has been implemented with zero regard for local inhabitants, human or animal or avian, or the environment which is the only unspoiled and accessible area of land around Tramore Bay.

Regarding the Heritage Officer's recommendations, a full quarter was taken up with the discussion of choughs and gulls, birds which live and feed on cliffs, not in the woods. No other birds were mentioned

signifying a complete lack of knowledge or interest in the area or the environment in general. Specific lighting was recommended where possible. This is not acceptable either. Lighting has been shown to be a huge disturber of bird and animal life, causing confusion and interrupting breeding patterns. This environment is small and fragile and vital, its elements interconnected. Any disturbance here will change it forever.

2. Lack of Clarity

Regarding lighting, Council plans only include a notice saying PUBLIC LIGHTING TO BE RENEWED AND EXTENDED WHERE REQUIRED which, like 'where possible' in the Heritage Officer's recommendation, leaves a lot of room for manoeuvre. While there are recommendations regarding lighting from the Council Heritage Officer they do not go far enough. Any lighting around the woods will likely disturb the bats and birds there.

Additionally, there seems to be no mention of the old boundary wall which is of concern regarding both biodiversity and heritage which is a huge omission.

Additionally, exact excavations near the woods are not detailed.

Main points

The proposed street lighting (even modified lighting) will be a disturbance to bird and bat life.

The possible removal of the containing wall will be a disturbance to flora and fauna including a removal of food source and a removal of insect habitat.

The removal of that wall will add light pollution from passing cars.

The removal of that wall will allow rainwater run off from the roads which may undermine the woods.

The increase in traffic through the wood by the one-way system coupled with the increase in housing is already disturbing the environment and may undermine the woods.

Excavations around the woods will disturb the woods.

That developments and proposals in their obliqueness and lack of proper surveying will pave the way for further developments including further lighting and impacts.

Desirable Outcomes

A properly focused environmental survey in co-operation with interested members of the community to benchmark this vital habitat.

A ring fencing of Newtown Woods as an important environmental resource for our heritage and community wellbeing.

Street lighting limited to the entrance of the housing development and not to continue down the road by or through the woods.

The containing wall to remain.

One way system is scrapped.

Additional Information - Reasons to survey and protect Newtown Woods

Ireland is one of the least wooded countries in Europe with only 9% wooded area and most of that being made up of commercial forests. Waterford as a coastal county has even less wooded areas and the only protected woodlands are in the west of the county. Older woodlands are incredibly important and in fact are in an emergency situation.

Newtown Woods contains a variety of broadleaved trees: Oak, ash, sycamore, alder, beech, horse chestnut. Many elms regenerating and some quite established which is good given the devastating effects of Dutch Elm disease. Dense cover of hawthorn, blackthorn and bramble and various species of ferns. Some flowering wild plants also present include wood aven, common vetch, bush vetch, germander

speedwell, thyme-leaved speedwell, wood sage, figwort, common mouse ear, ground ivy, (native) bluebell, 3-cornered leek, bulbous buttercup, field buttercup, herb Robert, cut-leaved cranesbill, trefoil, yarrow, wild carrot, cleavers, woodrush, sorrel, pennywort, bindweed, woodbine & many grasses.

The old boundary wall is a treasure trove of mosses, ferns and many other plants. This wall also provides both a habitat for insects and food for birds. Long eared owls nest here and there is currently a nesting sparrowhawk (which is protected). Other birds include but are not limited to coal tit, blue tit, wren, robin, thrush, rook, wood pigeon, chiff chaff, grey wagtail, tree creeper, blackbird, black cap, gold finch and gold crest.

There are two types of bat here, the Pipistrelle and Leisler's Bat and numerous insects including varieties of bees, butterflies and moths. This is a rich habitat and its flora and fauna are interlinked -Disturb one part, you will disturb it all.

This area is also part of our heritage, the woods and wall being part of Lord Doneraile's estates. Lord Doneraile was a title owned by the St. Ledger family who had estates in Cork and Waterford from the mid 1600s. Newtown House was built around 1750. By the early 1800s, Newtown was being managed by the Power family, still the dominant name in the area. Above is a map from 1840 which includes Newtown Woods. It was supposedly planted for commercial use - most likely for building carts, tools and out-buildings on the estate, and there is likely evidence of woods management e.g. coppicing from that period which is of historical interest.

And birds, animals and plants are not the only ones who benefit. Connection to nature is important for humans and this is acknowledged by initiatives like An Coillte's Woodlands for Health program. Without going into it too deeply, Here is a recent evaluation of the program. Another evaluation (2014) noted that participants mood and sleep was noticeable improved by the program.

Please don't hesitate to contact me for any additional information,

*Yours sincerely,
Clare Scott*

Submission No. 4 – Derek O'Donnell

Dear Sir or Madam,

I am writing in regard to the above mentioned works planned for Newtown Hill in Tramore. I am a local resident and regularly drive, walk and cycle along that route.

In relation to the proposed shared space for pedestrians and cyclists, I don't see that this will meet your stated objective of encouraging people to cycle. Shared spaces are taken over by pedestrians and don't allow cyclists to move at any speed. They are fine in the centre of a town but in this area a separate bike lane and footpath would be better for both cyclists and pedestrians. Personally I often cycle to work and I would not be encouraged to cycle on a shared footpath with people walking with children and dogs as I want to get to and from work safely and in a reasonable time. What would encourage me is a bike lane and an improvement to the road surface which is particularly bad along that stretch. I regularly cycle on the roads in Tramore and Waterford, with other cyclists, past "shared spaces" which are only being used by pedestrians. I've only ever seen young children cycling on shared spaces, adults need proper cycling lanes.

I tried to use a shared space once, but having to dodge pedestrians and dogs and making slow progress put me off and I returned to the roads as a safer option.

At the start of Newtown Glen, the drawing appears to show the path joining with the cul-de-sac in Newtown Glen. I presume this is simply a drawing error as there is no benefit to opening the berm and it doesn't match your project aims. If that is not the case I would appreciate you letting me know.

Section 6-6 doesn't show the existing berm with trees and plants on it. I presume this will be retained and this is simply a drawing error as it wouldn't fit your stated goals for the project. I can see no benefit to removing it and plenty of reasons to keep it. Again in this area I believe a cycling lane on the road and separate to the pedestrian footpath is a better and safer option. It is too dangerous to mix fast moving cyclists with pedestrians.

The section of road here has been creeping wider in the past few years as people drive on the grass verge on the caravan park side and this has then been filled in with tarmac. The original verge should be reinstated to reduce the width of the road and a kerb put in to discourage people from driving on the grass. Also I presume the road will be resurfaced to encourage cyclists to use it.

If you have any queries about anything, feel free to contact me at this email address.

Best Regards,

Derek O'Donnell

Submission No. 5 – Derek O'Donnell

Hi Ian,

- 1. I am delighted to see that facilities for walking and cycling in Tramore are being improved.*
- 2. Is it intended to remove the old stone wall at the western end of the proposed development? If one turns left coming out of Guillamene Car Park and then turns right at the T Junction, this wall is on the right hand side, bordering Newtown Wood. I think this wall should be retained as*
 - a. it has heritage value as a good example of the stone mason's craft and is in a very good state of repair*
 - b. it has ecological value as a habitat for insects and wild flowers and provides nesting sites for small birds such as blue tits*
 - c. it also has ecological value as a barrier between the wood and the motor traffic, human disturbance, noise and artificial light associated with the road.*

d. retention of the wall makes it harder for an attacker to hide in the wood or to drag a victim into the wood.

3. Is it intended to remove or retain the old earthen bank between the existing road and new footpath opposite Newtown caravan park?

4.. I am disappointed that the environmental impact study did not consider the possible effects of this development on Newtown Wood, particularly the effects of artificial lighting. Where is it intended to place lights near Newtown Wood and what type of lights are envisaged and how high will they be?

Thanking you,

Dónal Toolan

Submission No. 6 – Gas Networks Ireland

Thank you for your enquiry to the Gas Networks Ireland Dial Before You Dig service, please find the attached network map for your area of interest.

Gas Networks Ireland has Distribution Gas Network within your area of interest.

Before you start work, you must have a current gas network map (or maps) for the work location. A current gas network map (or maps) must always be kept on site while work is under way.

Reading your Map

High pressure transmission gas pipe is shown Red.

Medium pressure distribution gas pipe is shown Blue.

Low Pressure distribution gas pipe is shown Green.

The gas network map is indicative only. You must conform to the safety and legal notices printed on the map. For further information on reading this map refer to the Safety Information.

Breaking Ground

Supervision by Gas Networks Ireland is not required when working in the vicinity of Distribution gas pipes (unless noted otherwise). Safe digging practices must be followed. All work in the vicinity of a gas transmission pipeline must be carried out in compliance with:

Health and Safety Authority, Code of Practice for Avoiding Danger from Underground Services.

Critical Activity

Quarrying or blasting must not be carried out within 400 m of the gas network until Gas Networks Ireland has been consulted on 1800 42 77 47

Aurora Telecom

Part of the Aurora Telecom Network may be present on your network map. For further information, Aurora can be contacted on 01 892 6166 (Office Hours) or auroralink@gasnetworks.ie.

Service Pipes

Service pipes feeding individual properties are not generally shown but their presence should always be anticipated. For further information on domestic gas services refer to the Safety Information.

Safety Information

Before starting work any work in the vicinity of the gas network, please refer to the Gas Networks Ireland safety booklet, Safety advice for working in the vicinity of natural gas pipelines, available at <https://www.gasnetworks.ie/home/safety/dial-before-you-dig/>

This booklet contains important safety information, including advice on how to read the gas network maps you have requested.

If you did not request this map. please contact Customer Service on 1800 42 77 47.

Thank you for your enquiry to Gas Networks Ireland.

Submission No. 7 – Gerard O’Riordan

Lighting will disturb the natural wildlife fauna and is unnecessary for such an out of town location.

Gerard O’Riordan

Submission No. 8 – Irish Water

Dear Sir / Madam,

Please accept this submission in respect of the above-referenced planning

application for development at Tramore, Co. Waterford.

Irish Water has reviewed the plans and particulars in regard to the proposed development and has the following observation;

2 Uisce Éireann Irish Water

Irish Water records indicate the existence of existing infrastructure (154mm uPVC water main and 250mm uPVC rising main) within and in close proximity to the proposed site boundary where applicant is proposing to build which can impact the existing Irish Water water main. The existing assets must be protected during the proposed works.

Irish Water has no objection in principle to the proposed development and request any grant of permission be conditioned as follows:

- 1. The applicant must engage with Irish Waters Diversions Team prior to commencement of any works to apply for a build over/near application to ensure the appropriate protection of any assets during construction phases of the proposed development.*
- 2. Layouts drawing showing the proposal cycle route and existing IW mains must be submitted to Irish Waters Diversions Team prior to commencement of works.*
- 3. Applicant must confirm onsite the location and cover level of the existing IW mains to Irish Waters Diversions Team prior to commencement of works.*
- 4. Cross section drawing showing the proposal cycle route/footpath and existing IW mains shall be submitted to Irish Waters Diversions Team prior to commencement of works.*
- 5. Method statement for the construction works and how applicant will protect the existing mains during the construction works must be submitted to Irish Waters Diversions Team prior to commencement of works.*
- 6. Irish Water does not permit any build over of its assets, any proposals by the applicant to divert or build over existing water or wastewater services shall be submitted to Irish Water for written approval prior to works commencing.*
- 7. Separation distances between the existing Irish Water assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details.*

8. All development shall be carried out in compliance with Irish Water Standards codes and practices.

Reason: To ensure proper planning & sustainable development

2 Uisce Éireann Irish Water

Queries relating to the terms and observations above should be directed to planning@water.ie

Signed on behalf of Irish Water:

Submission No. 9 – John & Sarah Good

From John & Sarah Good making their personal and business representation with regard to the impact and benefits of the proposed scheme to their personal home and business (Newtown Cove Caravan Park)

We would like to say that as a whole we can see the benefit of the proposed scheme and understand the narrowing of the road system and provision of better footpaths will increase safety for non-motorized road users.

However there are a few practical areas that also need to be addressed.

Diagram 1 shows the widened area to the north of the carriageway that was created opposite the entrance to our Caravan Park during the recent Stormwater upgrade works.

This area has proved a great success with traffic management around our entrance and has lead to improved traffic flow and safety to all road users and pedestrians in the area.

We find that both large and small vehicles are using it to slow down and pull in to wait for larger vehicles to pass in the other direction instead of having to leave the carriageway onto the grass to avoid contact.

We wish to see the retention of this area as there a benefit when our business is busy, we have in the past often had a queue of Motorhomes and Cars towing Caravans queuing on the road outside our entrance leading to general traffic disruption. Now we find that they wait to the side until they are able to make a safe entry, allowing traffic to flow naturally and sight lines for oncoming traffic remain clear. This will be especially important with the addition of a pedestrian crossing at the junction.

We have in the passed also noticed the natural behaviour of some of our prospective customers is to wait on the grass verge/ carriageway outside our business while they check if we have space for them or so they can judge if they want to stay with us. The new waiting area has provided a much safer option to do this for both themselves and other road users.

We would propose that this area is retained and marked in such away to allow for waiting but no parking.

Diagram 2 shows our proposal for the addition of a curb to the western side of the carriageway between Newtown Glen and Newtown Cove Caravan Park.

We agree that the total width of the carriageway should be 6.2m as proposed. This is a similar width to what the carriageway has been until recently. However we see the need for a curb on both sides of the carriageway to stop the carriageway from slowly creeping wider and wider as it has been doing over the last 18 months.

The current carriageway had widened by almost a meter in some areas over the last 18 month as passing traffic has been mounting the grass verge to avoid contact with larger vehicles. The Councils Roadmaster Spray Injection patching machine then comes along and fills in the edge of the roadway where the potholes are in order to protect the edge of the carriageway from breaking up. This happens every few months especially during the winter and the carriageway has slowly grown wider and wider. This needs to be stopped as the carriageway is getting closer to our boundary hedge and the back of the Mobile homes on the other side.

The carriageway needs to be clearly defined and curbing installed on both sides, if it is to remain the same width over any period of time.

Our final submission is that the lighting on the proposed Controlled Zebra Crossing at the road junction next to the entrance of Newtown Cove Caravan Park, be installed in such a fashion as to stop the lights shining into our personal residence and that the lights be subdued as there proposed location is right next to our bedrooms.

Kind Regards

John & Sarah Good

Submission No. 10 – Kevin Murphy

Dear Ian,

I note the proposed development of an Active Travel Scheme for Newtown Hill / Newtown Glen.

I live on the first row of Newtown Glen. Looking at the designs I am enquiring about cross section 6 210512 / 103 on the proposed layout. We currently have a beautiful hedge in front of our houses that separate us from the footpath. Your proposed layout describes this as a "grass verge".

Can you please advise me on the actual plans for this area opposite the ten houses on the front row of Newtown Glen as the proposed layout does not show our existing hedge. All of the residents would be very opposed to the removal of the hedge and knowing in advance that the retention of the hedge is part of the plans would go a long way in allaying fears.

Could you please confirm receipt of this email.

Thank you.

Kind Regards

Kevin Murphy

Submission No. 11 – Kevin Sutton

Hello Ian,

My name is Kevin Sutton and I live in Newtown Rise, Tramore. I am writing with some observations regarding the above Newtown, Tramore - Pedestrian & Cyclist Scheme.

Firstly, the extension of the footpath leading into Newtown Rise is most welcome. As a resident of here I have concerns over the dangers imposed while exiting Newtown Rise on to Newtown Hill. At present it is almost impossible to see any traffic coming down the hill while exiting. I am concerned that any reduction in width of the carriageway will now add to that current danger. Also, although there is a speed ramp in place before the exit, this does little or nothing to slow the traffic coming down the hill, as it does not seem to be high enough. With the ever increasing number of SUV and off-road vehicles on our roads, I believe this speed ramp is not fit for purpose. As this speed ramp is also tapered down at the sides, cyclists and users of e-scooters travel very close to the wall to avoid it and this further increases the risk of an accident here. Only within in the last month I had a very scary close call, when a person on an e-scooter was coming down the hill at speed while I was inching out on to the road to improve my view. This scooter shot past me at relatively high speed having almost appeared from nowhere as they were so close to the wall avoiding the speed ramp.

I do hope that these observations are noted in relation to this development and that we can keep this junction as safe as possible into the future.

Thank you.

Kevin Sutton

Submission No. 12 – Laura Cassin

Hi Ian

I have viewed plans for the active travel scheme and have two observations I hope can be addressed in relation to a

property at Lindos Seafield Newtown Hill

I am submitting on behalf of my mother Annette Cassin who owns this property.

1. The location of the raised pedestrian crossing is adjacent to a patio and conservatory which are constantly in use so we would like detail on position/noise/light from this addition and if it does impact adjoining property can this be discussed.

2.A portion of the boundary of property is a rough ditch dating back to when house was built. We have concerns with people being directed here as a pathway that the increase footfall may erode the ditch.

Overall we welcome the scheme and its benefits to the area to residents.

Look forward to hearing from you regarding the above

Kind regards

Laura Cassin

Submission No. 13 – Mary Newell

I wish to raise a concern regarding the ancient woods on the road to Newtown Cove. Can you tell me if the trees behind the dry stone wall will be impacted by the above development. I don't see any reference to the said trees in the EIS and would like to know if consideration has been given to the eighteen mature trees directly behind the wall.

I live in the vicinity and walk by the woods daily.

Kind regards,

Mary Newell

Submission No. 14 – Maurice Hickey

Sir, my observation is not related to the planning procedure, but the information supplied. I have reviewed the proposal for Newtown Hill. I note that the plans show the current speed ramps which are not included in the legend, there is no mention of whether they will be left as is or improvements made. The issue I have is that the speed ramp adjacent to Newtown rise is wholly ineffective. SUVs/4X4s do not slow for it and cyclists do not slow as they are able to pass at the side. This ineffective speed ramp causes a hazard to those vehicles exiting Newtown Rise due to poor visibility to the right hand side coupled with the speed of vehicles and cyclists travelling down Newtown Rise. The Council recently tried to rectify this known near miss blackspot by painting a yellow hatched box at the entrance to Newtown Rise up to the ramp. It has not slowed the traffic including cyclists.

Maurice Hickey

Submission No. 15 – Maurice Foran & Miranda Jones

TO WHOM IT MAY CONCERN

Pedestrian and Cycle Active Travel Scheme along the Newtown Hill and Newtown Glen in Tramore, Co. Waterford

My partner and I are residence of Newtown hill who welcome this development and we would like to make the following observations :-

As you are aware there is a very busy bus stop situated outside our property which services a wide catchment area including Newtown, West Town, Fenor and beyond. A lot of passengers are collected and dropped off by car at this stop, we think it would be prudent to allow for a number of car parking bays to be provided to facilitate the safety of everyone. We assume that the bus stop will be moved between the 2 entrances at Newtown hill and perhaps consideration would be given to providing a bus shelter at the site considering the popularity of the stop.

Our second observation is that no provision has been made to allow for traffic turning right off the top of Newtown Hill in the direction of Newtown Woods West Town direction given that there is plenty of room to accommodate all parties safely consideration should be given for either a mini roundabout or a traffic island this would ensure a smooth and safe flow of the traffic.

Regards,

Mr Maurice Foran & Ms Miranda Jones

Submission No. 16 – Noel Kelly

Dear Mr. Ludlow

I refer to the above and I wish to confirm that I am very happy to see this initiative being planned by the County Council. The road to Newtown Glen is in vital need of development and this initiative will greatly enhance the safety for all road and pedestrian users in the environs. I need not remind you that this is a Sli Na Slainte walk and we have many walkers (of all generations and ages) using this roa on a daily basis.

I trust that the road itself will be resurfaced as soon as possible once the works on the paths have been completed.

Kind regards

Noel Kelly

Submission No. 18 – Steven Clancy

Hi Ian

As a resident of Newtown Glen I am delighted to see that we will at last have transport improvements connecting our estate to the ring road.

The Active Travel development is significant to the quality of life of all of our residents. In particular, the safety of our children walking and cycling to school, to socialise with friends and participate in sports will be greatly enhanced.

Of course there are the other environmental benefits of reduced dependency on cars and health advantages of increased activity and social connectivity that are of significant importance in creating an overall improvement in the lives of local people and indeed tourists who flock to the area.

However, as a local person living in Newtown Glen for almost 20 years, I would like to highlight that the road surface from the top of Newtown Hill is constantly being damaged by rain water running down the road surface. The need for adequate drainage is obvious and should be central to any road development in the future.

Thank you and your colleagues for all your efforts. It is much appreciated.

Kind regards

Steven Clancy

Submission No. 19 – Steven Clancy

Hi Ian

I would like to submit that I am fully behind the Active Travel Scheme. It will be a game changer for all of our community and visitors alike.

I would also like it noted that the broader issue of the road surface and road drains should be tied in with this scheme as the existing infrastructure is wholly inadequate.

Thank you and all concerned for your efforts in implementing this fantastic infrastructure.

Kind regards

Steven Clancy

Submission No. 20 – Tom Power

Hi

A few observations as a cyclist who uses this area for cycling on a weekly basis.

1. When you come from Newtown Glen Road to the Newtown Hill Roundabout, how are cyclists to turn right towards The Coast Road or Fenor Road, as the cycle path is on the Right hand side of the road. When designing Junctions the following check should be completed.

How does the cyclist go straight ahead and What is the cyclists delay in going straight ahead

How does the cyclist turn right and What is the cyclists delay in turning Right

How does the cyclist turn left and What is the cyclists delay in turning Left

2. When travelling along Newtown glen the shared path disappears into a foot path , where is the cyclist to go? Pull out into on coming traffic.

3. It does not state if the proposed cycle lanes are to be one way or two way. Two-way cycling on one side of a street (instead of one-way on both sides) is not usually the appropriate solution.... This can lead to accident potential at side roads and driveway, delays / difficulties accessing and exiting offside tracks and the potential for bike-bike collisions

One-way cycle facilities either side of the road are generally preferred as they are easier to access and less problems at junctions and side roads

Shared pedestrian and cycle paths should be 4m wide and lit. I believe the ones proposed are only 3.0mtr for the shared and 2.0mtr for the cycle lane only

A quality of service should also be applied

Can you cycle two abreast?

Can you cycle without interruptions along the route

Is there reduced delays at signals?

Is there reduced impact on traffic

Also would it not be a better use of funds to go from the Newtown Roundabout onto The Coast Road R375, where there are many housing estates and a possibility of using a segregated cycling path along this stretch of road as there is ample space and using it as a Bike Corridor to the 3 schools accessible along this road. You have the Holy Cross School , Ardscoil na Mara, Gaelscoil Philib Barun, and you can easily access Glor na Mara also. The scheme is call ACTIVE TRAVEL, should the council not be trying to encourage people to use cycling as a mode of transport for all citizens and get the schools and parents involved in these schemes, not just going it alone and doing what ever.

Thanks

Tom Power

Submission No. 21 – Tramore Eco Group

At a meeting of Tramore Eco Group on the 13th of June, there was concern about the aforementioned proposal expressed by all members present. Our group unanimously agreed that we should make a submission to WCC about our reservations, in spite of agreeing that attempts to encourage more cycling and walking was welcomed. We would therefore like to raise a number of issues in relation to the proposed Newtown, Tramore, Pedestrian and Cyclist scheme and its potential environmental impact.

In this proposal, under section 6.2 ‘Ecological Assessment’, it states that the scheme will have no effect on any of the following ecological sites: Tramore Sand Dunes and Back Strand (SAC); Tramore Back Strand (SPA) and the mid-Waterford Coast (SPA). Under the Environmental Impact Assessment of this proposal, it further states that the proposed works “will not incur loss of habitat from the ecological footprint of the

SAC or SPA” and concludes that “there is no potential for significant effects on the conservation objectives of Tramore Backstrand SAC and SPA, and as such no further assessment required, thus the project can be screened out for Appropriate Assessment” (p18 & 19). It is curious that these were the areas that were environmentally assessed as these are not the areas where the development will take place. There is a question therefore of why there was no assessment conducted in the environs of Newtown and especially Newtown Woods? While there may be no impact on Tramore Sand Dunes or the Back Strand, if this development were to go ahead there would be a considerable negative environmental impact on Newtown Woods, itself an area of immense ecological significance.

There are a number of points that we would like to raise in relation to this.

Waterford city has the lowest tree count in Ireland, and Tramore the lowest tree count in Waterford. There are three woodland areas in Tramore of which Newtown Woods is one, which makes it an area of significant ecological importance which needs to be protected and conserved in its own right.

In 2020 Tramore Eco Group (T.E. G.) conducted an ecological survey at this site (please see attached). This woodland is habitat to many different species including woodland birds and bats. Its many birds include the Sparrow Hawk and the meadow pipit both of whom are red-listed species. There is also evidence of both the long-eared owl and the barn owl frequenting the woods. Developments like you are proposing, through increased footfall, traffic and pollution will lead to habitat loss for these species.

Of particular richness in wild plant life is the low wall by the road bordering the wood which is home to (although this is not an exhaustive list): wood aven, common vetch, bush vetch, Germander speedwell, thyme-leaved speedwell, wood sage, common mouse ear, ground ivy, herb Robert, cut-leaved cranesbill, three-cornered leek, yarrow, wild carrot, cleavers, sorrel, pennywort, ivy, ribwort plantain, woodbine and many other plants including grasses, mosses and ferns. The demolition of this wall alone will affect the habitat of all these species.

The proposed artificial light of this development will have an adverse and detrimental effect on the birds, bats and other species as constant light throws them out of sequence.

As a result of these environmental effects, we ask that the development take into account the following:
The low wall to be retained.

Artificial light to shine on walkway/cycleway only and not into the woods, noting that light should shine down and not up.

We request also that Newtown Woods be protected and conserved as it is, as one of the remaining areas of woodland in Tramore.

Yours sincerely,

Niamh Brennan (on behalf of TEG)

Birds seen on Guillamene/Westown Round Jan 2022												
Method: Looked at rocks and sea while swimming at either Guillamene or Newtown Cove then walked by road, left from Guillamene Carpark, left at T junction, past Metalman, right at												
The number recorded is the number seen together at one site, even though some species such as robins might have several pairs along the route.												
Species	Date	8	12	14	15	16	19	20	23	25	26	30
Herring Gull		8	4	7	4	1	2	2	14	3	0	10
Stonechat		0	0	1	0	0	0	0	1	0	0	1
Blackheaded Gull		0	0	0	1	0	0	0	0	0	0	0
Robin		0	0	2	2	1	2	1	1	1	0	1
Cormorant		1	1	1	1	0	1	2	0	4	0	1
Curlew		0	0	0	3	0	1	0	0	0	0	0
Rock Pipit		1	0	0	0	1	0	1	0	0	1	1
Hooded Crow		2	1	1	0	0	0	0	1	1	0	0
Rook		2	1	2	2	2	3	0	1	0	0	8
Meadow Pipit		0	0	0	0	0	0	0	0	0	1	0
Jackdaw		0	1	3	6	11	0	8	0	8	0	2
Magpie		0	0	14	0	0	0	1	0	3	0	0
Starling		2	4	10	3	21	51	6	3	8	5	3
Grey Wagtail		0	0	0	0	0	1	1	1	0	0	0
Chough		2	0	0	0	0	0	0	2	2	0	0
Blackbird		0	2	7	1	1	7	13	1	2	1	1
Pied Wagtail		1	2	2	1	1	1	0	0	2	1	0
Song Thrush		1	2	1	0	1	0	1	0	0	0	1
*Buzzard		0	0	0	0	0	0	0	0	0	1	0
Blue Tit		1	1	0	1	1	1	0	0	1	0	0
Great Tit		0	0	0	0	0	0	0	0	0	1	0
House Sparrow		0	2	1	1	0	0	0	1	3	4	1
Goldfinch		0	0	3	1	0	0	0	0	0	0	1
Chaffinch		0	0	0	1	0	0	0	0	1	0	1
Bullfinch		1	0	0	0	0	0	0	0	1	0	0
Collared Dove		1	0	2	1	0	0	0	0	2	0	0
Wood Pigeon		45	2	3	3	1	2	8	0	1	5	1
Raven		1	1	2	2	0	0	2	0	0	2	0
*Buzzard: On 26 Jan 22 there were two sightings of a single buzzard, but it looked like two different birds. A local reported seeing two buzzards recently in the area												
Mammals: Jan 2022 One hare seen 16 Jan; one seal seen 30 Jan												
Other bird species or higher numbers seen from 25/12/21 to 31/01/22 on non-recording days												
Kestrel 1; Bullfinch 2; Curlew 4												
Unidentified birds, perhaps of thrush family seen: 13 on 15 Jan and 2 on 19 Jan. Did not seem to be redwing.												

Vascular Plants

Scientific Name	English Name	Date Recorded	Site	Tetrad	
<i>Pteridium aquilinum</i>	Bracken	24/06/2020	Newtown Woods	X59U	native
<i>Filipendula ulmaria</i>	Meadowsweet	24/06/2020	Newtown Woods	X59U	native
<i>Rumex crispus</i>	Curled Dock	24/06/2020	Newtown Woods	X59U	native
<i>Cirsium arvense</i>	Creeping Thistle	24/06/2020	Newtown Woods	X59U	native
<i>Urtica dioica</i>	Nettle	24/06/2020	Newtown Woods	X59U	native
<i>Heracleum sphondylium</i>	Hogweed	24/06/2020	Newtown Woods	X59U	native
<i>Dactylis glomerata</i>	Cock's-foot	24/06/2020	Newtown Woods	X59U	native
<i>Ranunculus repens</i>	Creeping Buttercup	24/06/2020	Newtown Woods	X59U	native
<i>Plantago lanceolata</i>	Ribwort Plantain	24/06/2020	Newtown Woods	X59U	native
<i>Plantago major</i>	Greater plantain	24/06/2020	Newtown Woods	X59U	native
<i>Senecio jacobea</i>	Ragwort	24/06/2020	Newtown Woods	X59U	native
<i>Armeria maritima</i>	Thrift	24/06/2020	Newtown Woods	X59U	native
<i>Taraxacum agg.</i>	Dandelion	24/06/2020	Newtown Woods	X59U	native
<i>Arrhenatherum elatius</i>	False-oat grass	24/06/2020	Newtown Woods	X59U	native
<i>Rubus fruticosus agg.</i>	Bramble	24/06/2020	Newtown Woods	X59U	native
<i>Potentilla reptans</i>	Creeping Cinquefoil	24/06/2020	Newtown Woods	X59U	native
<i>Vicia sepium</i>	Bush Vetch	24/06/2020	Newtown Woods	X59U	native
<i>Lolium perenne</i>	Perennial ryegrass	24/06/2020	Newtown Woods	X59U	native
<i>Lotus corniculatus</i>	Bird's-foot Trefoil	24/06/2020	Newtown Woods	X59U	native
<i>Festuca rubra</i>	Red Fescue	24/06/2020	Newtown Woods	X59U	native
<i>Bellis perennis</i>	Daisy	24/06/2020	Newtown Woods	X59U	native
<i>Plantago maritima</i>	Sea Plantain	24/06/2020	Newtown Woods	X59U	native
<i>Carex otrubae</i>	False-fox Sedge	24/06/2020	Newtown Woods	X59U	native
<i>Viola riviniana</i>	Common Dog-violet	24/06/2020	Newtown Woods	X59U	native
<i>Trifolium repens</i>	White Clover	24/06/2020	Newtown Woods	X59U	native
<i>Iris pseudocorus</i>	Yellow Flag	24/06/2020	Newtown Woods	X59U	native
<i>Rumex sanguineus</i>	Wood Dock	24/06/2020	Newtown Woods	X59U	native
<i>Holcus lanatus</i>	Yorkshire Fog	24/06/2020	Newtown Woods	X59U	native
<i>Ulmus glabra</i>	Wych Elm	24/06/2020	Newtown Woods	X59U	native
<i>Equisetum palustre</i>	Marsh Horsetail	24/06/2020	Newtown Woods	X59U	native
<i>Carex remota</i>	Remote Sedge	24/06/2020	Newtown Woods	X59U	native
<i>Ranunculus acris</i>	Meadow Buttercup	24/06/2020	Newtown Woods	X59U	native
<i>Trifolium pratense</i>	Red Clover	24/06/2020	Newtown Woods	X59U	native
<i>Asplenium scolopendrium</i>	Hart's-tongue Fern	24/06/2020	Newtown Woods	X59U	native
<i>Calystegia sepium</i>	Hedge Bindweed	24/06/2020	Newtown Woods	X59U	native
<i>Acer pseudoplatanus</i>	Sycamore	24/06/2020	Newtown Woods	X59U	introduced, naturalised
<i>Prunus spinosa</i>	Blackthorn	24/06/2020	Newtown Woods	X59U	native
<i>Aesulus hippocastanum</i>	Horse Chestnut	24/06/2020	Newtown Woods	X59U	introduced
<i>Centaurea nigra</i>	Common Knapweed	24/06/2020	Newtown Woods	X59U	native
<i>Petasites pyrenaicus</i>	Winter Heliotrope	24/06/2020	Newtown Woods	X59U	invasive, garden escape
<i>Scrophularia auriculata</i>	Water Figwort	24/06/2020	Newtown Woods	X59U	native
<i>Galium aparine</i>	Cleavers	24/06/2020	Newtown Woods	X59U	native
<i>Geranium robertianum</i>	Herb-robert	24/06/2020	Newtown Woods	X59U	native
<i>Geum urbanum</i>	Wood Avens	24/06/2020	Newtown Woods	X59U	native
<i>Hedera hibernica</i>	Ivy	24/06/2020	Newtown Woods	X59U	native
<i>Epilobium hirsutum</i>	Greater Willowherb	24/06/2020	Newtown Woods	X59U	native
<i>Veronica beccabunga</i>	Brooklime	24/06/2020	Newtown Woods	X59U	native
<i>Polystichum setiferum</i>	Soft Shield Fern	24/06/2020	Newtown Woods	X59U	native
<i>Veronica chamaedrys</i>	Germander Speedwell	24/06/2020	Newtown Woods	X59U	native
<i>Chrysosplenium oppositifolium</i>	Opposite-leaved Golden-saxifrage	24/06/2020	Newtown Woods	X59U	native
<i>Hyacinthoides non-scripta</i>	Bluebell	24/06/2020	Newtown Woods	X59U	native
<i>Lysimachia nemorum</i>	Yellow pimpernel	24/06/2020	Newtown Woods	X59U	native
<i>Circaea lutetiana</i>	Enchanter's Nightshade	24/06/2020	Newtown Woods	X59U	native
<i>Veronica serpyllifolia</i>	Thyme-leaved Speedwell	24/06/2020	Newtown Woods	X59U	native
<i>Juncus inflexus</i>	Hard Rush	24/06/2020	Newtown Woods	X59U	native
<i>Valeriana officinalis</i>	Common Valerian	24/06/2020	Newtown Woods	X59U	native
<i>Fraxinus excelsior</i>	Ash	24/06/2020	Newtown Woods	X59U	native
<i>Fuchsia magellanica</i>	Hardy Fuchsia	24/06/2020	Newtown Woods	X59U	introduced
<i>Crataegus monogyna</i>	Hawthorn	24/06/2020	Newtown Woods	X59U	native
<i>Crocsmia x crocosmiiflora</i>	Montbretia	24/06/2020	Newtown Woods	X59U	introduced
<i>Stachys sylvatica</i>	Hedge Woundwort	24/06/2020	Newtown Woods	X59U	native
<i>Polypodium interjectum</i>	Western Polypody	24/06/2020	Newtown Woods	X59U	native
<i>Carex sylvatica</i>	Wood-sedge	24/06/2020	Newtown Woods	X59U	native
<i>Dryopteris dilatata</i>	Broad-buckler Fern	24/06/2020	Newtown Woods	X59U	native
<i>Hypericum androsaemum</i>	Tutsan	24/06/2020	Newtown Woods	X59U	native
<i>Lonicera periclymenum</i>	Honeysuckle	24/06/2020	Newtown Woods	X59U	native
<i>Quercus cerris</i>	Turkey Oak	24/06/2020	Newtown Woods	X59U	invasive
	Pedunculate Oak	24/06/2020	Newtown Woods	X59U	native
<i>Lamiastrum galeobdolon ssp argentatum</i>	Yellow Archangel	24/06/2020	Newtown Woods	X59U	native
<i>Fallopia japonica</i>	Japanese Knotweed	24/06/2020	Newtown Woods	X59U	invasive
<i>Apium nodiflorum</i>	Fool's-watercress	24/06/2020	Newtown Woods	X59U	native
<i>Epilobium parviflorum</i>	Hoary Willowherb	24/06/2020	Newtown Woods	X59U	native
<i>Trifolium dubium</i>	Lesser Trefoil	24/06/2020	Newtown Woods	X59U	native
<i>Daucus carota</i>	Wild Carrot	24/06/2020	Newtown Woods	X59U	native
<i>Nasturtium officinale</i>	Watercress	24/06/2020	Newtown Woods	X59U	native
<i>Agrostis stolonifera</i>	Creeping Bent	24/06/2020	Newtown Woods	X59U	native

<i>Poa pratensis</i>	Smooth Meadowgrass	24/06/2020	Newtown Woods	X59U	native
<i>Brachypodium sylvaticum</i>	Wood False-brome	24/06/2020	Newtown Woods	X59U	native
<i>Salix cinerea</i>	Grey Willow	24/06/2020	Newtown Woods	X59U	native
Rumex acetosa					
<i>Rumex acetosa</i>	Common Sorrel	24/06/2020	Newtown Cove Meadow	X59U	
<i>Arrhenatherum elatius</i>	False-oat Grass	24/06/2020	Newtown Cove Meadow	X59U	
<i>Rubus fruticosus agg.</i>	Bramble	24/06/2020	Newtown Cove Meadow	X59U	
<i>Urtica dioica</i>	Nettle	24/06/2020	Newtown Cove Meadow	X59U	
<i>Hypochaeris radicata</i>	Cat's-ear	24/06/2020	Newtown Cove Meadow	X59U	
<i>Heraclium sphondylium</i>	Hogweed	24/06/2020	Newtown Cove Meadow	X59U	
<i>Ulex europaeus</i>	Gorse	24/06/2020	Newtown Cove Meadow	X59U	
<i>Crepis capillaris</i>	Smooth Hawk's-beard	24/06/2020	Newtown Cove Meadow	X59U	
<i>Cirsium arvense</i>	Creeping Thistle	24/06/2020	Newtown Cove Meadow	X59U	
<i>Daucus carota</i>	Wild Carrot	24/06/2020	Newtown Cove Meadow	X59U	
<i>Plantago lanceolata</i>	Ribwort Plantain	24/06/2020	Newtown Cove Meadow	X59U	
<i>Holcus lanatus</i>	Yorkshire Fog	24/06/2020	Newtown Cove Meadow	X59U	
<i>Carex remota</i>	Remote Sedge	24/06/2020	Newtown Cove Meadow	X59U	
<i>Senecio jacobea</i>	Ragwort	24/06/2020	Newtown Cove Meadow	X59U	
<i>Cerastium fontanum</i>	Common Mouse-ear	24/06/2020	Newtown Cove Meadow	X59U	
<i>Lolium perenne</i>	Perennial Ryegrass	24/06/2020	Newtown Cove Meadow	X59U	
<i>Dactylis glomerata</i>	Cock's-foot	24/06/2020	Newtown Cove Meadow	X59U	
<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass	24/06/2020	Newtown Cove Meadow	X59U	
<i>Ranunculus acris</i>	Meadow Buttercup	24/06/2020	Newtown Cove Meadow	X59U	
<i>Trifolium pratense</i>	Red Clover	24/06/2020	Newtown Cove Meadow	X59U	
<i>Centaurea nigra</i>	Knapweed	24/06/2020	Newtown Cove Meadow	X59U	
<i>Agrostis stolonifera</i>	Creeping Bent	24/06/2020	Newtown Cove Meadow	X59U	
Invertebrates					
<i>Aphantopus hyperantus</i>	Ringlet	24/06/2020	Newtown Cove Meadow	X59U	
<i>Maniola jurtina</i>	Meadow Brown	24/06/2020	Newtown Cove Meadow	X59U	

APPENDIX F – Bat Survey Report

An Assessment of the Potential For Impacts of the Tramore Cycleway on bats at Newtown Woods, Tramore, County Waterford



Introduction

Most of Ireland's mammals enjoy protection under the Wildlife Act (1976) and the more recent updating of this legislation (Wildlife (Amendment) Act 2000, S.I. No. 94 of 1997, S.I. No. 378 of 2005, European Communities (Natural Habitats) (Amendment) Regulations, 2005). In conjunction with the enactment of the Habitats Directive into Irish legislation, all native mustelid species and bat species are protected with further protection given to otters and lesser horseshoe bats. Determining the mammal fauna of an area may involve a high level of assessment if the aim of the survey is to catalogue all mammals but this is too detailed for the aim of creating mitigation for a new road alignment. This assessment is specific to the presence of bats within lands proposed for the construction of a cycleway connecting to Tramore, County Waterford. The proposal consists of the construction of a footpath behind the existing wall at Newtown Wood at the junction of Newtown Glen and Cliff Road to allow pedestrian and cyclist use of this area away from traffic.

The proposed footpath will extend 3 metres to the inner side of the existing masonry wall (which will remain in-situ) over a distance of approximately 75 metres (indicated in red on the image below) and will see the removal of some trees, which are close to the masonry wall.



Public lighting will be required and there would be security/safety consideration for users of the walkway to have lighting in place given that the masonry wall has to remain in place. The lighting design will need to take account of wildlife in the vicinity.

The survey undertaken within the site allows a targeting of mitigation measures to the appropriate or most efficient sites to prevent accidental death or injury and to determine if it would be possible to provide safe passage across long-established routes through a new development.

Fieldwork for the current report on bat distribution was carried out by Brian Keeley, an ecologist with over one third of a century of fieldwork experience. This report addresses the main issues affecting the bat fauna considered in this assessment and created by construction and the presence of new infrastructure and lighting.

Construction activities and subsequent operation of the cycleway create a number of significant short-term and long-term risks for the resident bat population, in addition to impacts upon other vertebrates and invertebrates. The construction itself may involve the removal of key features of the surrounding environment and of the habitats of bats and other mammal species, in this case, trees.

The most damaging operation is the potential for the destruction of roosts and for the accidental exclusion or killing of bats roosting within trees upon the site.

There is the potential for losses of commuting routes and feeding areas where a change to a site modifies the availability of insect prey, creates a barrier to movement or removes access to roost sites. In this scheme, there would be no building or wall removal but there would be tree losses and possibly tree surgery to accommodate the infrastructure and to deal with any perceived or actual risk from trees to cyclists or pedestrians in addition to the introduction of human activity to the woodland edge and to each side of the existing wall.

Methodology

The proposed cycleway site at Newtown Wood was examined on October 3rd, 2022, to identify any bat roosts or potential bat roosts. This involved the examination of all trees and the stone wall with the aid of a fibrescope, a Helion 2XP50 Pro thermal imager and a high-powered torch during the daytime. The trees within the 3-metre band of construction and any trees with branches immediately in contact with this area were examined for roosting bats, bat signs (including bat droppings and staining and worn timber where roosts have been used over an extended period).

Following this, a bat activity survey was conducted from prior to sunset and for an hour and a half before a pause in the active survey that was re-commenced one hour prior to sunrise and continued up to sunrise. A static monitor was placed on the stone wall to identify all bat activity along the road and wall from sunset to sunrise. Bat records from Bat Conservation Ireland were examined for any nearby roost data.

The active survey involved the use of a handheld Anabat Walkabout and the Helion thermal imager. This allowed the identification of bat activity during the survey period and also the pinpointing of the bat fauna within and around the site.

Results

Bat roosts within the footprint of the Proposed Cycleway None

Bat roost potential within the footprint

One significant tree and a minimum of one minor roost potential

There is roost potential within a small number of trees within the section that would be felled to facilitate the Cycleway. The highest roost potential is a sycamore with at least one hollow (see overleaf). No evidence of bats was noted within the tree and there was no bat activity associated with the tree during the activity survey.



Roost potential is highest in a sycamore at the centre of the section passing Newtown Wood (top)

with lesser potential in a number of trees along this stretch (bottom)



Roost potential created by rot holes and cavities



Rot in sycamores offering roosting potential

Bat roost potential around the Cycleway

There are several buildings in close proximity to the Cycleway. One house opposite the corner of Cliff Road may be a soprano pipistrelle roost. A soprano pipistrelle was noted to arrive on site early into observations across the lawn of this garden during a crosswind during which time foraging would have been impossible and thus it is most probable that the bat was arriving from its roost site

Bat activity within and around the footprint of the Cycleway

Bat activity along the section of proposed Cycleway was very limited on the night of survey. The Newtown Glen section was exposed to a constant strong breeze / wind, and this is not conducive to clustering of insects. Thus, it is not an area of high value to foraging bats. In contrast, the Cliff Road area is very sheltered and bat activity was relatively constant in this area. Several soprano pipistrelles were encountered within this area and there was at least one calling male soprano pipistrelle, evidence of chasing of soprano pipistrelles and feeding mainly high towards the tree canopy but often lower and within 2 metres of ground level on some occasions. The southern-most corner of the proposed Cycleway was the only area of repeat bat activity.

The static monitor placed halfway along the route recorded only 15 bat passes of two bat species in the entire night. In comparison to this, the handheld monitor recorded 170 passes and three bat species. The two species recorded by both detectors were common and soprano pipistrelle. The third species, Leisler's bat, was only recorded twice feeding to the west of the woodland over gardens (in a strong breeze). This bat did not pass the static monitor halfway along the survey section. While there is a likelihood that more bat activity occurs on calmer nights, it is clear that the Cliff Road area has much better conditions for foraging bats.

Bat species	Passes per hour			Grand Total
	7 am	8 pm	9 pm	
Pipistrelle			1	1
Common pipistrelle		1	3	4
Soprano pipistrelle	9	1		10
Grand Total	9	2	4	15

Bat species	Passes per hour				Grand Total
	6 am	7 am	7 pm	8 pm	
Leisler's bat			2		2
Common pipistrelle	1	2	21	9	33
Soprano pipistrelle	22	42	73		137
Grand Total	23	44	94	9	172

Potential Impacts of the Proposed Tramore Cycleway

Roost loss

There are a small number of roost opportunities within the trees that will be removed. None showed evidence of usage in 2022. This would be a long-term negative impact if there are roosts removed.

Loss of shelter

Tree removal increases wind disruption to the trees beside the cleared area. This would be lessened by the presence of the stone wall.

Disturbance from lighting

Any installed lighting would affect the ability of bats to roost and may affect commuting and foraging.

Mitigation Measures

Checking of all trees prior to removal

All trees shall be assessed by a bat specialist prior to removal. Where there are suitable roost opportunities in any tree, the tree must be felled immediately after the assessment (if bats are absent). If bats are present, a derogation shall be required to exclude and re-locate the bats. This must be undertaken by a licensed bat specialist.

Checking of the stone wall for bats

The stone wall shall be examined prior to any re-pointing or repair work.

Planting of additional trees on the perimeter of the wood

Trees shall be planted on the northern edge of the Wood to compensate for lost trees. This should avail of local individuals of native species where possible, and the removed trees should be considered as options for the new planting. If there is a Woodland Management Plan for Newtown Wood, this should be undertaken with this plan as a guide.

Bat boxes within Newtown Wood

6 x 2F Schwegler Bat Boxes (General Purpose) shall be installed in Newtown Wood. These must be away from lighting, no less than 2.5 metres above ground level and away from clutter / dense bramble etc.

Lighting control

- Lighting shall be directed downwards away from the treetops.
- Tree crowns shall remain unilluminated
- All luminaires shall lack UV elements when manufactured and shall be LED
- A warm white spectrum (<2700 Kelvin) shall be adopted to reduce blue light component
- Luminaires shall feature peak wavelengths higher than 550 nm
- Lights must not be left on throughout the night
- Preferably, lighting should be motion activated to reduce energy wastage and unnecessary illumination. This could be achieved by motion sensors to each end of the woodland section such that lighting would be triggered at a point 3-4 metres away from the required location along the Wood.

Impacts After Mitigation

There will be no significant impact upon bats following all of the proposed measures. If lighting is permanently on, this may affect bat movement and foraging to a very low extent. The likely scale of impact is from slight negative to nil impact.



Bat activity at Newtown Woods from sunset 3rd October 2022

The first bat noted was at 19.18 hours (a soprano pipistrelle (shown by the circle within the blue paddle)

The first Leisler's bat was heard at 19.20 hours flying high along Newtown Glen.

The first common pipistrelle was noted at 19.22 hours. Almost all bat activity noted (with the exception of Leisler's bat) during the active survey was along Cliff Road where trees are dense, and the trees almost meet at canopy level. Bats were almost always flying high up at canopy level with some low-level flight up and down the road.



Bat activity at Newtown Woods prior to sunrise 4th October 2022



Bats shown by thermal imager. 4 bats are present above and 5 below.



Soprano pipistrelle flying along Cliff Road (top) and 2 chasing soprano pipistrelles (bottom)



Bat activity along Cliff Road and towards the junction with Newtown Glen

Images taken with a thermal imager

(top left) A bat passing a cyclist (top right) a bat flying low near the southern corner of the survey site. (bottom left) a bat towards the canopy height

Image taken in daylight: (bottom right) the Cliff Road corner and area with relatively high bat activity