

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Development:	Two storey extension (floor area 199sq.m) containing 1 classroom at ground floor level; 1 classroom and an assisted shower room at first floor level to the rear of existing two storey school building (floor area 2,767sq.m); new roof window to existing roof surface of adjacent stairwell, together with all associated site works.
Location:	Gaelscoil Naomh Padraig, Castle Road, Lucan, Co. Dublin
Applicant:	The Board of Management
Reg. Ref:	SD21A/0129
Report Date:	15th July 2021
Planning Officer:	Sarah Watson
Recommendation:	Request Additional Information

Main Concerns:

- Impacts of the proposed development on existing trees and local biodiversity including lack of suitable mitigation or compensation measures
- Potential impacts on bats (foraging routes)

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

DP 2016-22 Section 8.3.0 Public Open Space Hierarchy and Landscape Setting

It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.

G4 Objective 1: To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.

G4 Objective 2: To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

DP 2016-22 Section 8.1.0 Green Infrastructure Network

G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network

G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within the design proposals and supporting their integration into the Green Infrastructure Network.

G2 objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting etc. into existing areas of hard infrastructure wherever possible.

G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

DP 2016-22 Section 8.5.0 Green Infrastructure within Urban Areas

G6 Objective 1: To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

DP 2016-22 Section 9 Heritage Conservation and Landscapes

HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

DP 2016-22 Section 8.4.0 Sustainable Urban Drainage Systems

Sustainable Urban Drainage Systems (SUDS) drain surface water in an environmentally friendly way by replicating natural systems in managed environments. SUDS systems seek to collect, store and

clean surface water using natural systems and to release it back into the environment in a slow and controlled way, thereby reducing the risk of fluvial and pluvial flooding. Key features, such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins are easy to manage, environmentally friendly and aesthetically attractive.

G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems

G5 Objective 2: To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments

Living with Trees – Tree Management Policy 2015 – 2020

South Dublin County Council's Tree Management Policy 'Living with Trees' 2015-2020 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites. Relevant points within this section include:

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- The Council will promote the replacement of trees removed to facilitate approved planning and development of urban spaces, buildings, streets, roads, infrastructural projects and private development sites.

Public Realm Comments:

In relation to the above proposed development, this section has reviewed the application and has the following comments.

The Public Realm Section would have some concerns regarding the impacts of the proposed development on the existing trees/woodland along the north western boundary.

1. Tree and Development

South Dublin County Council has a duty to ensure wherever possible that existing trees and hedgerows are retained. The removal of existing trees should be considered as a last resort. Where the council accepts that felling is necessary, replacement planting will be required. The extent, maturity and nature of replacement planting will be considered on a case by case basis. Replacement planting should be within the site in the first instance and should be in the same general location.

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2016-2022 and with best practice guidelines and recommends the following ADDITIONAL INFORMATION be requested:

2. Tree Survey

There are concerns with the lack of information submitted in relation to the existing trees within the site and the impact the proposed development will have on these existing trees. The applicant is requested to submit a detailed tree survey report for the trees within the proposed development area. This tree survey shall be undertaken by a suitably qualified arborist. The report shall provide detailed information on the condition and health of the existing trees and it shall also clearly detail what impacts the development will have on the trees but also potentially the tree roots.

The applicant shall submit and agree a comprehensive Tree Report with SDCC Public Realm Section. This shall comprise of a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
- Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).

- Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate
- Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
- Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.
- Arboricultural Method Statement: clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.
- Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- Pre Development Photo's: Prior to the commencement of works the applicant shall submit pictures of the existing trees/hedgerows before works commence with the tree protective fencing. This shall include a location map of where each picture was taken from.
- Arborist's name, arboricultural qualifications and contact details.
- Date that the survey

ADDITIONAL INFORMATION

3. Compensatory Planting

The applicant is requested to submit information as to the proposed Compensatory Planting to be provided in the event that the analysis and assessment process supports felling rather than removal. Details of replacement/compensatory tree planting, indicating positions or density, species, and planting size shall be agreed with the Public Realm. **ADDITIONAL INFORMATION**

Reason: To assimilate the development into its surroundings, in accordance with policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 of the CDP 2016-2022.

4. Impacts on Bats

There are concerns with the lack of information submitted in relation to the to the potential impacts on Bats caused as a result of the proposed development.

The applicant is requested to submit a bat survey for bat usage carried out across the entire site and immediately adjoining sites to assess roosting and feeding/foraging activities and assessing potential impact on these species arising from the proposed development. This is to be undertaken by a qualified and experienced bat expert at the appropriate time of the year for the survey of species.

ADDITIONAL INFORMATION

Reason: To ensure the protection of the natural Heritage of the site.

Summary

The Public Realm Section would have concerns with regard to the impact of this proposed development on the existing trees, as such the applicant is requested to provide the above additional information.

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