

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Donal Farrelly

Area Planning Officer

Planning Department

Development: Removal of selected hedging, the removal of the existing 52 car parking spaces and the construction of a 4-storey apartment building with setbacks at third floor level, total 14 apartments comprising of 1 one-bedroom, 11 two bedroom; 2 three bedroom apartments, all with associated private open spaces areas in the form of balconies; access to the development from existing vehicular and pedestrian entrance from Leixlip Road (R835) and from proposed new vehicular and pedestrian access from Ardeevin Drive; all with associated landscaped courtyard at ground floor level, sedum roof (main roof), bicycle storage, bin storage, signage, associated drainage and site development works (Protected Structure RPS No. 094).

Location: Ball Alley House, Leixlip Road, Lucan, Co. Dublin

Applicant: Gerry Teague

Reg. Ref: SD21A/0179

Report Date: 19th August 2021

Recommendation: **ADDITIONAL INFORMATION**

Main Concerns:

1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity: The proposed development involves the removal of street trees in SDCC ownership and may impact on trees in neighbouring properties. No Tree Survey, Arboricultural Assessment or Tree Protection Plans have been provided.

2. Lack of SuDS (Sustainable Drainage System) shown for the proposed development: An underground attenuation tank is included and the proposed street trees on Ardeevin Drive lack SuDS tree pits. The SuDS proposals lack detail.
3. There is a lack of Public Open Space provision. We require the Public Open Space to meet the requirements of SDCC County Development Plan 2016 – 2022.
4. Play proposals are not inclusive and accessible and lack safety surfacing.

Site Area

0.168 ha

Zoning

Objective Residential (RES) - To protect or improve residential amenity

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

DP 2016-22 Ch 7 Infrastructure & Environmental Quality (IE). Section 7.2.0 Surface Water & Groundwater

Policy 2 (IE 2) Surface Water & Groundwater

'It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive. '

IE 2 Objective 3:

'To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.'

IE 2 Objective 5:

*'To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and **avoid the use of underground attenuation and storage tanks.**'*

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.

Policy H12 Public Open Space and Policy H13 Private and Semi-Private Open Space

Section 11.3.1 (iii) of the Development Plan confirms that a total of 10% of the site area should be reserved for public open space.

Section 11.3.1 (iii) Public Open Space/Children's Play:

- A detailed Landscape Plan that outlines the extent of open space and details for its treatment will be required with residential developments of 10 units and above.

- Public and semi-private open space in all residential developments will be required to incorporate natural features that promote children's play. Opportunities for children's play should be addressed as part of the Landscape Plan.
- Play features should be sited so that they are accessible and supervised, without causing nuisance to nearby residents.

The Public Realm Section has assessed the proposed development in accordance with the CDP and best practice guidelines and recommends the following;

1. Arboricultural Impact of the Proposed Development

It appears that the development requires the removal of street trees in SDCC ownership. A Tree Survey, Arboricultural Impact Assessment and Tree Protection Plan has not been provided.

The applicant should submit and agree a comprehensive Tree Report with SDCC Public Realm Section. This should 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 should be carried out by a Professional Member of Arboricultural Association who is an independent, qualified Arborist and should 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) should 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)] should 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. Provide a summary in table format summary of the trees to be lost as result of the proposed development and numbers of new trees to be planted as part of the landscape proposals in order to mitigate against this tree loss.
- Pre Development Photo's: Prior to the commencement of works the applicant should submit pictures of the existing trees/hedgerows before works commence with the tree protective fencing. This should include a location map of where each picture was taken from.
- Arborist's name, arboricultural qualifications and contact details.
- Date that the survey was carried out (surveys > 12 months are unacceptable). **ADDITIONAL**

INFORMATION

2. SUDS

We welcome the green roof, permeable paving and SuDS tree pits in the drainage proposals. However, overall there is a lack of SuDS (Sustainable Drainage System) for the proposed development. The Public Realm Section consider that the proposed development is contrary to Policy IE2 Objective 5, Policy G5 -Sustainable Urban Drainage Systems and Objectives G5 1 in the County Development Plan. SDCC do not approve of using underground tanks as part of SuDS schemes where the full potential for the natural drainage features has not been explored. Further, natural SUDS features should be incorporated into the proposed drainage system.

The applicant should be requested to:

1. revisit the design and layout of the proposed development and demonstrate how the development will comply with these policies and objectives.

2. submit revised plans and particulars addressing item 1 and demonstrate how further natural SuDS features can be incorporated into the design of the proposed development

The SuDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. The applicant shall show further proposed SuDS features for the development such as SuDS tree pits in all new trees adjacent to hardstanding including replacement street trees, channel rills, swales, and other such SuDS and show what attenuation capacity is provided by such SuDS. All SuDS should be incorporated into the landscape proposals. Details to be provided and a SuDS strategy demonstrating how the SuDS features work including for the SuDS 'planters'.

3. PUBLIC OPEN SPACE AND PLAY

There appears to be a lack of Public Open Space. The applicant is requested to demonstrate that their proposals meet the requirement of a minimum 10% Public Open Space as required by SDCC County Development Plan 2016-2022.

Details of play space proposals to be agreed with the Planning Authority. Play Proposals shall include assessable play features. Details of play equipment, and safety surfacing, along with specifications and proof that all play equipment conforms to European Standards EN 1176-1-11 and EN 1177 Playground Equipment and Surfacing shall be submitted. **ADDITIONAL INFORMATION**

Summary

There is no tree survey and arboricultural impact assessment. The proposed development in its current configuration involved the removal of street trees in SDCC ownership and would materially contravene Policy IE2 Objective 5, Policy G5 -Sustainable Urban Drainage Systems and Objectives G5 1 in the County Development Plan. There are concerns about the lack of accessible Public Open Space with accessible Play.

The Public Realm Section is requesting that the applicant provide a tree survey and alter the layout of the proposed development in order to manage surface water fully via sustainable drainage systems that deliver amenity and biodiversity as well as water quality treatment and attenuation. Replacement street trees should incorporate SuDS tree pit systems. The applicant is requested to demonstrate that SDCC requirements for Public Open Space and accessible play to be met.

Fionnuala Collins

Assistant Parks Superintendent

Laurence Colleran

Senior Executive Parks Superintendent