

## **SOUTH DUBLIN COUNTY COUNCIL**



### **INTERNAL MEMORANDUM**

#### **Public Realm Planning Report**

**Sarah Watson**  
**Area Planner**  
**Planning Department**

**Development:** Alterations to previous approved planning application, Reg. Ref. SD15A/0105, consisting of: construction of a new single storey flat roof modular changing facilities (293sq.m) ancillary to the existing playing pitch; relocation of approved 38 carparking spaces and 2 coach parking bays from northern boundary to the eastern boundary adjacent to Cloverhill Road installation of new overhead flood lights; 3 new flag poles; continuation of previously permitted boundary wall and footpath (Reg. Ref. SD15A/010) extending along the south eastern boundary, with addition of new security fencing added to top of wall, all adjacent to Cloverhill Road; new entrance gates (accessed via the permitted entrance off Cloverhill Road); all associated boundary treatment, landscaping and ancillary works necessary to facilitate the development.

**Location:** Cloverhill Road, Clondalkin, Dublin 22.  
**Applicant:** Ballyfermot United Sports and Social Club  
**Reg. Ref:** **SD21A/0181**  
**Report Date:** **20<sup>th</sup> August 2021**  
**Recommendation:** **ADDITIONAL INFORMATION**

### **Main Concerns:**

1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity. The proposal lacks street trees and has floodlighting that may on local biodiversity including bats.
2. Impacts of the proposed development on green and blue infrastructure – the proposals lack a landscape plan with details. There are no sustainable drainage proposals or details.

### **Site Area**

0.01794 ha

### **Zoning**

Objective RES - To protect or improve residential amenity

### **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 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.

## **DP 2016-22 Section 11.6.0 Implementation: Infrastructure and Environmental Quality**

### **11.6.1 Water Management**

#### **(ii) Surface Water**

Development proposals should provide suitable drainage measures in compliance with the Greater Dublin Strategic Drainage Study (GSDSDS) and Greater Dublin Regional Code of Practice for Drainage Works. The maximum permitted surface water outflow from any new development should not exceed the existing situation. On greenfield lands the permitted outflow of a development should be the equivalent to a greenfield Site. All new development must allow for climate change as set out in the GSDSDS Technical Document, Volume 5 Climate Change.

#### **(iii) Sustainable Urban Drainage System (SUDS)**

In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems (SUDS). SUDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. In some exceptional cases and at the discretion of the Planning Authority, where it is demonstrated that SUDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort.

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

#### **1. Landscaping**

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide a fully detailed landscaping scheme for the proposed development. The applicant should provide a fully detailed landscape plan with full works specification and a fully detailed planting plan that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscaping including levels, sections/elevations and details, detailed design of SUDs features including swales, permeable paving, green roofs and integrated tree pits etc. Planting is to incorporate

native and pollinator friendly trees and planting including native meadow species. The applicant is referred to the All Ireland Pollinator Plan National Biodiversity Data Series No 23, Pollinator-friendly management of Sports Clubs available at <https://pollinators.ie/wp-content/uploads/2021/01/Pollinator-Sports-Clubs-guide-WEB.pdf> for guidance on planting and management. Boundary details including street tree planting should be provided along the Cloverhill road, to match/complement tree planting on the opposite side of the road. Trees adjacent to hardstanding to incorporate SuDS tree pits to manage surface water runoff.

#### **ADDITIONAL INFORMATION**

#### **2. Existing Trees - Survey and Protection**

There are concerns with the lack of information submitted in relation to existing trees and hedgerows on and adjacent to the subject site. The applicant has not provided any information as to the potential impacts of the development on these adjacent trees and hedgerows. The applicant is requested to submit a detailed tree and hedgerow survey report for the trees adjacent to the site boundary. This tree survey should be undertaken by a suitably qualified arborist. The report should provide detailed information on the condition and health of the existing trees and it should also clearly detail what impacts the development will have on the trees but also potentially the tree roots. **ADDITIONAL**

#### **INFORMATION**

#### **3. SUDS**

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Natural SUDS features should be incorporated into the proposed drainage system. 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 Green roofs, grass areas, SuDS tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. SuDS should be shown on the landscape proposals and details provided on how they function.

#### **4. Impacts on Biodiversity due to proposed Lighting**

Flood lighting is proposed on either side of the Sports pitches. The applicant should evaluate the impact of flood lights on biodiversity and propose appropriate mitigation.

## **Summary**

In its current configuration the proposals do not provide enough detail on existing trees, landscape proposals, biodiversity and sustainable drainage.

The Public Realm Section is requesting that the applicant provide detail of the proposed facilities to ensure there is sufficient protection and provision/enhancement of blue/green infrastructure and protection /enhancement of local biodiversity.

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**Fionnuala Collins**

**Assistant Parks Superintendent**

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**Laurence Colleran**

**Senior Executive Parks Superintendent**