

## SOUTH DUBLIN COUNTY COUNCIL



### INTERNAL MEMORANDUM

Department: **Parks & Landscape Services / Public Realm**

Date: **03/02/2021**

**Sarah Watson, Area Planner**

**Planning Department**

**Development:** The construction of 569 dwellings, a creche, innovation hub and open space in the Clonburris South West Development Area of the Clonburris SDZ Planning Scheme 2019 as follows: 173 houses comprising 8 two bedroom houses, 153 three bedroom houses and 12 four bedroom houses (147 dwellings in CSW-S4 consisting of 8 two bedroom houses, 127 three bedroom houses & 12 four bedroom houses & 26 three bedroom dwellings in CSW-S3}, all 2 storey comprising semi-detached, terraced, end terrace units (with parking and private open space); (B) 148 duplex apartments/apartments {88 in CSW-S4 & 60 in CSW-S3} comprising 74 two bedroom units and 74 three bedroom units, in 16 three storey buildings. In CSW-S4 Duplex Blocks A,B,C,D,E,F,G,J,K, comprise 8 units (4 two bed & 4 three bed units), Duplex Block H comprises 16 units (8 two bed & 8 three bed units), In CSW-S3 Blocks L, N & O comprise 8 units (4 two bed & 4 three bed units), Block M comprises 14 units (7 two bed & 7 three bed units), Block P comprises 10 units (5 two bed & 5 three bed units), Block Q comprises 12 units {6 two bed & 6 three bed units}, all to have terraces/pitched roof; (C) 396 apartments as follows: within CSW-S4, Block 1 consists of 172 apartments (76 one bedroom, 91 two bedroom and 5 three bedroom apartments), in a 2-building arrangement both 6 storeys in height. Within CSW-S3, Block 2 {4 storeys} comprises 16 one bedroom apartments and 22 two bedroom apartments, Block 3 (4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments (all apartments to have terrace or balcony); (D) Provision of an innovation hub (626sq.m) and creche (c. 547sq.m) in a part 3/4 storey 'local node' building in CSW-S4; (E)

Vehicular access will be from the permitted Clonburris Southern Link Street (SDZ20A/0021) and R113 to the east {along with provision of internal haul routes {for construction) to connect to the R136 to the west); (F) Public Open Space/landscaping of c. 4.1 hectares (to include Local Park and MUGA in CSW-S3, Grand Canal Park, along the southern and eastern boundaries of the site to connect to existing Grand Canal towpath) as well as a series of communal open spaces to serve apartments and duplex units (c. 0.39 ha); (G) all ancillary development works including footpaths, landscaping boundary treatments, public, private open space areas, car parking (656 spaces) and bicycle parking (672 spaces), single storey ESB substations/bike/bin stores, 'Gateway' entrance signage (2), solar panels at roof level of apartments, and all ancillary site development/construction works; (H) Permission is also sought for revisions to attenuation permitted under SDZ20A/0021 as well as connection to water supply, and provision of foul drainage infrastructure; this application is being made in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015; an Environmental Impact Assessment Report accompanies this planning application; the application applies for 7-year planning permission for development at this site of c. 17 .02 hectares (on two parcels of land to include entrance area) within the townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin all on wider lands bounded generally by undeveloped lands and the Dublin-Cork railway line to the north, undeveloped lands and the Grand Canal to the south, the R113 {Fonthill R Road) to the east and the R136 to the west.

**Location:** In the townlands of Cappagh, Clonburris Little and Kishoge, Co. Dublin

**Applicant:** Cairn Homes Properties Ltd.

**Reg. Ref:** **SDZ21A/0022**

**Zoning:** Clonburris Strategic Development Zone  
Clonburris Character Area Clonburris South West CSW3 and CSW4  
Development Area 3: Clonburris South West

**Site Area:** 17.02 hectares

**Recommendation:** **Significant Further Information**

## Main issues:

1. **Impact on existing hedgerows and biodiversity.** We welcome the proposed retention and enhancement of existing trees and hedgerows along the Fonthill Road and within the Grand Canal Park pNHA. However, there needs to be greater effort to integrate, retain and enhance existing hedgerows and plant compensatory hedgerow in the local parks, green spaces and roadsides both within and outside of the 50m pNHA no development zone.

### ***Clonburris SDZ Biodiversity Management Plan (BMP)***

***HR12*** The Parks and Landscape Strategy indicates the retention of 7,720m of hedgerow / linear woodland habitat within the strategic open spaces - 5,200m along the canal, 520m along the Griffeen river and 2,000m of hedgerow within parks and open spaces. ***When final landscape designs are being prepared for open spaces, this level of retention is considered to be the minimum acceptable.***

### ***Clonburris SDZ Park and Landscape Strategy***

***The Hedgerow/treeline habitat linking the Grand Canal Corridor and the Rail corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats. Where these hedgerows cannot be retained, a new hedgerow network composed of the same species shall be planted along roadways within the development.***

***...developments on the lands should identify and protect, where possible, the existing green infrastructure elements on the lands including green open spaces, hedgerows, large trees, watercourses and other natural physical features as these are a strong part of the lands history and will define the character of areas and help to create attractive neighborhoods.***

2. **Insufficient Green Infrastructure - the potential of the development to sever green infrastructure and potential to create strong GI Links.**
  - a) Street tree provision is inadequate: there are large sections of streets without trees in the Public Realm. More effort is needed to create strong green infrastructure links throughout the development. This is best achieved through additional street trees and SuDS to create these connections.
  - b) Greater efforts are required integrate, retain and enhance existing hedgerows into the local green space/infrastructure and local parks outside the 50m no development line.

*A Key principle of the Clonburris SDZ Planning Scheme is:*

*'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**'*

and

*'**New green spaces will be interconnected with existing green infrastructure** to form multifunctional corridors and hubs ... along the Grand Canal... through existing and proposed Parks, ... through existing hedgerows ... and connecting into existing green spaces outside the SDZ lands. **Local level green infrastructure corridors shall be provided along the new urban structure of streets and spaces (i.e. trees, tree lines, swales margins)**'.*

The Clonburris SDZ Parks and Landscape Strategy also has an objective that *'New green spaces will be interconnected with existing green infrastructure to form biodiversity corridors.'*

### **3. Insufficient natural SuDS (Sustainable Drainage System)**

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Although permeable paving in parking bays; limited swales, a filter drain; and two detention basins have been provided. Further natural SuDS measures are required to deliver a treatment train for improving water quality and utilising water to **maximise amenity and biodiversity** to comply with the Clonburris SDZ planning scheme. Water needs to be attenuated in more localised SuDS features.

Where detention basins have underground tanks, water should be directed to the detention basin to allow it to fill first with the 1 in 100 year storm allowing the underground tank to fill. Detention basins should have a low flow channel and a sloped face.

There appears to be a conflict between the number of swales shown in the drainage proposals and those shown on the landscape drawings. SuDS proposals should be consistent and all SuDS features included in attenuation calculations.

### **4. Public Open Space Grand Canal Park and (pNHA) hedgerow protection**

#### Grand Canal Park:

- i) It is unclear from the plans whether the proposed native hedgerow would be sufficient to protect the existing native hedgerow from damage from users. Further measures (defensive planting; native hedging, chestnut paling) should be proposed where required in localised areas to prevent damage to existing

vegetation by users of the Park and to prevent desire lines or paths forming through this sensitive area.

Local Park:

- i. Requires appropriate boundary fencing, planting, a lockable vehicular access for maintenance and a separate entrance for pedestrians. A line of removable bollards is not an adequate entrance.

All Public Open Space:

- i. We required a greater retention of existing trees and hedgerows within the pNHA, parks and public open space as required by the Clonburriss SDZ Planning Scheme (2019) and Clonburriss SDZ Parks and Landscape Strategy.
- ii. The use of compacted gravel is not suitable in Public Open Spaces use to attenuate water. We require paths to be a permeable solid surface.
- iii. Park Boundaries to have appropriate boundaries to a standard suitable for Public Realm, with entrances for vehicular access and separate entrances for pedestrians.

5. **PLAY**

The concept of using natural play is acceptable and we require further detail on this.

**6. BATS AND LIGHTING**

We are concerned about the impact of the development on bats. In particular we have concerns about lighting design and bat sensitivity.

**Relevant Sections from Clonburris SDZ Planning Scheme 2019, are shown in Appendix 1**

A key layer of the Planning Scheme Framework is the provision of green infrastructure as:

- tree lined avenues and streets, designed according to DMURS;
- traffic calmed local streets,
- retained hedgerows and
- an exemplar in the provision of sustainable urban drainage.

SUDs are to be designed as an ecological resource designed into the street, public squares and open space network. It is essential that open spaces accommodating SUDS measures such as attenuation ponds, shall be designed in order to achieve a balance between surface water management and high quality open space. SuDS shall achieve a multifunctional space for amenity, biodiversity and surface water management and should include grasses and swales, and high quality, well designed attenuation ponds and constructed wetlands. SuDS key elements are:

- *A system of infiltration trenches, **tree pits**, permeable paving green roofs, and other elements shall be provided that should direct surface water to attenuation areas.*
- **Swales** should be designed as linear landscape elements and **used as elements to enhance streetscape** and neighbourhood character and identity.
- **Surface water should be captured and treated within the curtilage of each site using green roofs, rainwater gardens, filter trenches or bio retention units.**
- **Streets should be generously planted at frequent intervals.**

The planning scheme requires the **connection** of 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.

**Design Criteria For Open Space:** *Include for important Sustainable Urban Drainage System functions; 'SUDS features such as major detention ponds and swales' and 'Retention and enhancement of selected hedgerow'.*

**Design Criteria For Local Parks and Squares:** *Include local level SuDS function; small swales and bioretention areas and retention and enhancement of selected hedgerow*

**Design Criteria For Local Links:** *Tree lined street and avenues' and 'Incorporation of small scale SUDS features such as swales, where appropriate'.*

**Section 2.11 The Hedgerow/treeline habitat linking the Grand Canal Corridor and the Rail corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats. Where these hedgerows cannot be retained, a new hedgerow network composed of the same species shall be planted along roadways within the development.**

Refer Appendix 1 for all key relevant principles and objectives and **diagrams** illustrating how the green infrastructure should be integrated.

**Relevant Sections from Clonburris SDZ Parks and Landscape Strategy, are shown in Appendix 2**

Some Key relevant elements of the strategy are highlighted below.

***'The strategy is centred on the high value existing vegetation along the canal corridor, particularly along the northern edge of the canal. The strategy proposes to retain and enhance the existing vegetation and extend this habitat into the proposed parks where possible'***

***'Developments on the lands should identify and protect, where possible, the existing green infrastructure elements on the lands including green open spaces, hedgerows, large trees, watercourses and other natural physical features ...***

***New green spaces will be interconnected with existing green infrastructure to form biodiversity corridors.***

## **7.2 Local Links**

*Local links will be incorporated in the design of each development area, linking local and strategic open spaces.*

Design principles include:

- ***Use of small scale SUDS features where appropriate***
- ***Tree lined streets and avenues***

## **8 Tree Planting**

*Tree species should be selected for longevity, suitability to local soil conditions and micro-climate, biodiversity (native species) and suitability for close proximity to residential buildings. **A range of tree species and sizes should be utilised from semi-mature specimen trees to multi-stems.** The All-Ireland Pollinator Plan 2015-2020 should be used to form the basis of the proposed tree species. 'South Dublin County Council's Tree Management Policy 2015-2020' has also been consulted.*

### **8.1 Street Tree Planting**

***'Street trees should be considered as an integral part of the street environment (DMURS 2013) with the size and species selected proportionate to the width of the street and planted at frequent intervals.***

***Medians, verges and build outs should be used as areas in which to plant trees, as well as within privacy strips on residential streets.***

## **13 Soft landscape**

***Proposed tree sizes should range from semi-mature specimen trees to multi-stemmed tree planting. Proposed trees should comprise predominantly of native species.***

*Consideration should be given to planting areas of trees in **copses or groupings**, whether as an extension to an existing hedgerow, or new independent planting as these form hubs which contribute to the biodiversity matrix, particularly if linked to other hubs with corridors such as streams/rivers or hedgerows.*

Refer Appendix 2 for all relevant sections and diagrams.

**Relevant Sections from Clonburris SDZ Biodiversity Management Plan (BMP) are shown in Appendix 3**

Key relevant elements of the strategy are highlighted below.

***Hedgerow and Treeline Objectives***

**HR12** *The Parks and Landscape Strategy indicates the retention of 7,720m of hedgerow / linear woodland habitat within the strategic open spaces - 5,200m along the canal, 520m along the Griffeen river and 2,000m of hedgerow within parks and open spaces. **When final landscape designs are being prepared for open spaces, this level of retention is considered to be the minimum acceptable.***

**HC15** *The planting of hedgerows within the parks areas and along roadways is a key habitat creation objective. This will compensate for the loss of hedgerow habitat within the lands.*

**BA02** *All proposals for development near bat roosts or ecological corridors must address the potential adverse impacts of lighting on bats. **Lighting should be at a low level, directional and should follow guidance provided by Bat Conservation Trust (2018) Guidance note 08/18 Bats and artificial lighting in the UK. Lighting plans near ecological corridors should be reviewed by a suitably qualified bat ecologist. If adverse impacts are anticipated, a derogation licence must be obtained from the NPWS.***

**5.3 Bats**

*In terms of lighting effects on bats, lighting throughout the SDZ should be at a low level, directional and should follow guidance provided by Bat Conservation Trust (2018) Guidance note 08/18 Bats and artificial lighting in the UK. Clonburris SDZ holds great potential for trialling and installing innovative red lighting.*

**Relevant Sections from Design Manual for Roads and Streets (DMURS) 2019:**

DMURS (2013)

**'4.2.2 Street Trees**

**Street trees are an integral part of street design as they contribute to the sense of enclosure, act as a buffer to traffic noise/pollution and enhance place. A traffic calming effect can also be achieved, where trees are planted in continuous rows and their canopies overhang, at least in part, the vehicular carriageway. Street trees can also be used to enhance legibility by highlighting the importance of connecting routes and distinguishing one area from another through variations in size and species selection. **The planting of trees should be considered as an integral part of street design'.****

**'4.2.7 Planting**



*In Neighbourhoods and Suburbs a greater emphasis may be placed on the use of planted materials to promote 'softer' landscape elements to promote a greener 'living' character. Streets also support an important drainage function within built-up areas. The shift toward sustainable forms of development has seen the emergence of Sustainable Urban Drainage (SUDs) systems. SUDs consist of a range of measures that emulate a natural drainage process to reduce the concentration of pollutants and reduce the rate and volume of urban run-off into natural water systems (and thus the pollutants it carries). The incorporation of SUDs elements into the fabric of the street itself can also serve to increase legibility and add value to place (see Figure 4.29). Further advice with regard to the use of SUDs may be found in the Greater Dublin Strategic Drainage Study (2005).*

**Relevant Sections from SDCC County Development Plan 2016-2022):**

The proposed development is not considered to be in accordance with the CDP 2016-2022 and below are a number of extracts from policies and sections which confirms same:

**CHAPTER 2 HOUSING (H)**

**Policy 12 Public Open Space**

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

**H12 Objective 1:**

To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).

**H12 Objective 2:**

To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.

**CHAPTER 6 ROAD AND STREET DESIGN**

**6.4.3 ROAD AND STREET DESIGN (i) Design of Urban Roads and Streets:** Harsh measures such as bare concrete walls will not be permitted, and alternative landscape measures such as street trees, screen planting and planted verges should be provided.

**CHAPTER 7 INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE)**

**Policy 2 Surface Water & Groundwater**

***It is the policy of the Council to manage surface water and to protect and enhance***

**IE2 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.

**IE2 Objective 4:** To incorporate Sustainable Urban Drainage Systems (SUDS) as part of Local Area Plans, Planning Schemes, Framework Plans and Design Statements to address the potential for Sustainable Urban Drainage at a site and/or district scale, including the potential for wetland facilities.

**IE2 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.

**IE2 Objective 9:** To protect water bodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains, within the County from inappropriate development. This will include protection buffers in riverine and wetland areas as appropriate (see also Policy G3 Objective 2 – Biodiversity Protection Zone).

## **CHAPTER 8 GREEN INFRASTRUCTURE**

**G1 Objective 1:** To establish a coherent, integrated and evolving Green Infrastructure network across South Dublin County with parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams forming the strategic links and to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans, such as Local Area Plans and other approved plans.

**G1 Objective 2:** To prepare and implement a South Dublin County Green Infrastructure Strategy during the lifetime of this plan that will form the basis for the identification, protection, enhancement and management of the Green Infrastructure network within the County.

### **GREEN INFRASTRUCTURE (G) Policy 2 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 3:** To restrict development that would fragment or prejudice the Green Infrastructure network.

**G2 Objective 4:** To repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network.

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

**G2 Objective 6:** To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries, and increase hedgerow coverage using locally native species.

**G2 Objective 7:** To incorporate items of historical or heritage importance in situ within the Green Infrastructure network as amenity features.

**G2 Objective 8:** To provide for the incorporation of Eco-ducts and/or Green Bridges at ecologically sensitive locations on the County's road and rail corridors that will facilitate the free movement of people and species through the urban and rural environment.

**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 design proposals and supporting their integration into the Green Infrastructure network.

**G2 Objective 10:** To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.

**G2 Objective 11:** To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters etc. into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.

**G2 Objective 12:** To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the control of these species throughout the County.

**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.

### **GREEN INFRASTRUCTURE (G) Policy 3 Watercourses Network**

**G3 Objective 1:** To promote the natural, historical and amenity value of the County's watercourses and address the long-term management and protection of these corridors in the South Dublin Green Infrastructure Strategy.

**G3 Objective 2:** To maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy, 2015; the Greater Dublin Area Strategic Cycle Network; and other government plans or

programmes will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments, as these routes increase the accessibility of the Green Infrastructure network.

**G3 Objective 3:** To ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations, to protect ground and surface water quality and build resilience to climate change.

**G3 Objective 4:** To uncover existing culverts and restore the watercourse to acceptable ecological standards and for the passage of fish, where possible.

**G3 Objective 5:** To restrict the encroachment of development on watercourses, and provide for protection measures to watercourses and their banks, including but not limited to: the prevention of pollution of the watercourse, the protection of the river bank from erosion, the retention and/or provision of wildlife corridors and the protection from light spill in sensitive locations, including during construction of permitted development.

#### **GREEN INFRASTRUCTURE (G) Policy 4 Public Open Space and Landscape Setting**

**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.

**G4 Objective 3:** To enhance and diversify the outdoor recreational potential of public open spaces and parks, subject to the protection of the natural environment.

**G4 Objective 4:** To minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.

**G4 Objective 5:** To promote the planting of woodlands, forestry, community gardens, allotments and parkland meadows within the County's open spaces and parks.

**G4 Objective 6:** To take steps, in conjunction with communities and businesses, to plant existing areas of grassed open space to promote the development of multifunctional amenity areas with enhanced biodiversity value.

**G4 Objective 7:** To avoid the cumulative fragmentation and loss of ecologically sensitive areas of the Green Infrastructure network to artificial surfaces and to position recreational facilities that incorporate artificial surfaces at appropriate community-based locations.

## **GREEN INFRASTRUCTURE (G) Policy 5 Sustainable Urban Drainage Systems**

**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.

## **GREEN INFRASTRUCTURE (G) Policy 6 New Development in 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.

**G6 Objective 2:** To require new development to provide links into the wider Green Infrastructure network, in particular where similar features exist on adjoining sites.

**G6 Objective 3:** To require multifunctional open space provision within all new developments that includes provision for ecology and sustainable water management.

## **CHAPTER 9 . HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 1 Overarching**

### **HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 15 Non-Designated Areas**

#### **HCL15 Objective 1:**

To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.

#### **HCL15 Objective 2:**

To ensure that, where evidence of species that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 exists, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.

**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.

## **HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 11 Grand Canal**

**HCL11 Objective 1:** To protect and enhance the important biodiversity resource offered by the Grand Canal.

**HCL11 Objective 2:** To facilitate the development of the Grand Canal as a recreational route for walking, cycling, nature study and water based activities including fishing, canal boating, rowing and canoeing/kayaking, subject to appropriate environmental safeguards and assessments.

**HCL11 Objective 3:** To ensure that development along or adjacent to the Grand Canal contributes to the creation of an open and integrated network of walking and cycling routes that integrate with the Grand Canal Way Green Route.

**HCL11 Objective 4:** To ensure that development along or adjacent to the Grand Canal protects, incorporates and enhances built and industrial heritage features, particularly historic canal and mill buildings, and also sets out to protect the setting of such built heritage features.

**HCL11 Objective 5:** To ensure that development along and adjacent to the Grand Canal protects and incorporates high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches and includes for an appropriate set-back distance or buffer area from the pNHA boundary to facilitate protected species, biodiversity, and a fully functioning Green Infrastructure network.

**HCL11 Objective 6:** To enhance the industrial heritage and the recreational and amenity potential of the 12th Lock and pursue the protection and conservation of the rich natural, built and cultural heritage of the area including natural habitats and ecological resources along the Grand Canal and Griffeen River.

**HCL11 Objective 7:** To seek the extension of the Grand Canal Way Green Route from the 12th Lock to Hazelhatch in partnership with Waterways Ireland and Kildare County Council.

### **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.

Development proposals should not give rise to the pollution of ground or surface waters either during construction phases or subsequent operation. This will be achieved through the adherence to **best practice** in the design, installation and management of systems for the interception, collection and appropriate disposal or treatment of all surface water and effluents.

### **(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.

Watercourses should remain open in their natural valley and culverting shall be confined to road crossings. In exceptional circumstances and at the discretion of the Planning Authority, approval may be given to install a culvert within a development where it is demonstrated that this is the most appropriate design response based on site specific constraints/circumstances.

#### **11.5.5 LANDSCAPE (i) Ecological Protection**

- In order to comply with European and National legislation on nature conservation, and to ensure that areas of biodiversity value are adequately protected, an Ecological Assessment will be required for development proposals that have the potential to impact on environmentally sensitive sites. This includes sites that are protected under EU and National Legislation; sites that may be in use by, or contain protected species or habitats; or sites that are in proximity to significant watercourses.
- All development proposals should seek to enhance biodiversity and avoid or minimise loss of existing local habitats and wildlife corridors.
- All development proposals shall maintain a biodiversity protection zone of not less than 10 meters from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities (see also Section 8.2 Public Open Space Hierarchy and Landscape Setting).

#### **Request Additional Information/Recommendations**

The following Additional Information is required:

##### **1. Tree and Hedgerow Retention**

*Clonburris Planning Scheme Section 2.22 Biodiversity and Natural Heritage, Hedgerows, states:*

*'The Hedgerow/treeline habitat linking the Grand Canal Corridor and the Rail corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats. Where these hedgerows cannot be retained, a new hedgerow network composed of the same species shall be planted along roadways within the development.'*

The applicant shall outline how this is going to be achieved and is it to be along roadways within this proposal. It is noted that 1,305m of hedgerow are proposed for removal due to construction and there are only 510 linear metres of proposed native hedgerow planting. The applicant is requested to propose compensatory hedgerow planting and indicate where the balance of replacement hedgerow is to be planted.

## **2. Tree and Hedgerow Protection and protection of all land within 30m buffer zone.**

The applicant shall provide a tree and hedgerow protection strategy including a Tree Protection Plan, prepared by a qualified arborist as recommended within the Tree File Ltd, Arboricultural Report in accordance with the Arboricultural Method Statement. The strategy shall include all land within the 30m buffer zone and the Fonhill Road embankment,

Prior to the commencement of development all land within the 30m buffer zone is to be fenced off to protect it. Such an area is very sensitive to development, it should not be used for stockpiling soils or material or for any other storage function. It should not be dug up or the ground otherwise disturbed. Areas of vegetation, hedgerows and individual trees to be protected with fencing to be as BS5837: Trees in relation to design, demolition, and construction.

## **ADDITIONAL INFORMATION**

**Reason:** To ensure the protection, safety, prudent retention and long term viability of trees and hedgerows to be retained on and immediately adjacent to the route.

## **3. Street trees**

- a) Proposed trees, configured to lie within the Public Realm, have been provided along some streets according to the requirements of Clonburris SDZ Planning Scheme and DMURS (2019), however several local streets and homezones lack street trees, estimated as:

- i.* **Street 1: Western Side**, approx. **140m - no street trees**
- ii.* **Street 2 Homezone North-South approx. 70m - no street trees**
- iii.* **Street 3 approx. 80m - no street trees**
- iv.* **Street 4 Homezone North-South; approx. 90m - no street trees**
- v.* **Street 5 approx. 50m - no street trees; and a further 35m has no street trees on western side,**
- vi.* **Street 6 Homezone North-South; approx. 60m - no street trees**
- vii.* **Street 7 North-south approx. 60m - no street trees**
- viii.* **Street 7 East-West approx. 310m has no street trees on northern side (local street and home zone)**
- ix.* **Northernmost Street: No street trees for approx. 90m.**



- x. Various Streets: street trees are provided at up to 8 perpendicular car parking spaces. The Clonburris SDZ requires street trees at least every 6 perpendicular car park spaces.

DMURS requires that trees must be an integral part of the street design to achieve traffic calming; enhance legibility by highlighting the importance of connecting routes and distinguishing one area from another through variations in size and species selection; as a buffer to traffic noise/pollution and to enhance place.

- b) SDCC do not accept front garden trees or trees between driveways as street trees. Such trees cannot be taken in charge and maintained by the Council.
- c) We note that street tree planting has been proposed on private curtilage and partly within the public footpath. This solution remains very problematic. The tree canopies and roots are still up to 50% on property not taken in charge by the Council which threatens the long term viability of the trees. The trees are also at risk from vehicles using the car parking spaces. The trees could be moved to the outside of the path shown on the drawing.
- d) A high quality of Street Tree planting is required throughout the development to strengthen Green Infrastructure links. The following additional information is required:
  - i) Street Trees to be provided fully in Public Areas to be an integral part of the street rather than in front gardens. The applicant is referred to the Clonburris SDZ Planning Scheme 2019, Clonburris SDZ Parks and Landscape Strategy and DMURS (2013) for guidance on street tree provision and appropriate design layouts for local streets and homezones.
  - ii) All Street Trees planted within the Public Realm shall have suitable tree pits that incorporates SuDS features.
  - iii) Street Trees to be planted at:
    - Minimum 18-20m girth along local streets
    - Minimum 16-18cm girth on intimate local roads, i.e. homezones.
  - iv) Street trees to incorporate SuDS Tree pits including sufficient growing medium.

The trees proposed for grass margins do not require SuDs tree pits, root deflectors, protection measures or tree grilles.

## ADDITIONAL INFORMATION

### 4. SUDS

The Clonburris SDZ strategy requires a green infrastructure based approach to drainage and stormwater management. SuDS are to be designed as an ecological resource designed into the street, public squares and open space network. These shall be of a high quality, designed as a series of 'wet' and 'dry' landscape elements to achieve a multifunctional space for amenity, biodiversity and surface water management.

It is essential that open spaces accommodating SUDS measures such as attenuation ponds and swales are designed in order to achieve a balance between surface water management and high-quality open space. The scheme requires:

- *A system of infiltration trenches, tree pits, permeable paving, swales, green roofs, and other elements that should direct surface water to attenuation areas.*
- *Swales designed as linear landscape elements to enhance streetscape and neighbourhood character and identity.*
- *Surface water to be captured and treated within the curtilage of each site using green roofs, rainwater gardens, filter trenches or bio retention units.*
- *The perimeter attenuation areas to be profiled to enable walkways, high quality planting, amenity edges, and habitat establishment.*
  
- *Open spaces to have 'important Sustainable Urban Drainage System functions' with 'SUDS features such as major detention ponds and swales' and 'Retention and enhancement of selected hedgerow'.*
- *Local Parks and Squares to 'include local level SuDS function with small swales and bioretention areas and Retention and enhancement of selected hedgerow*
- *Local Links to incorporate 'Tree lined street and avenues' and 'small scale SUDS features such as swales, where appropriate'*

*The use of underground tanking systems are generally not permitted.*

Further SUDS features shall be incorporated into the proposed drainage system. The SUDS shall 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 the Clonburris SDZ Planning Scheme (2019), the Clonburris SDZ Parks and Landscape Strategy (2019), Clonburris

Biodiversity Management Plan (2021) and South Dublin County Council Development Plan (2016-2022). Further *localised* SuDS measures shall create an above ground treatment train and include:

- i. bioretention tree pits, green roofs on apartment buildings, further swales, disconnected downpipes, rain gardens, channel rills, ponds, wetlands etc.
- ii. Swales to be planted with native and pollinator perennial riparian wildflowers using local species. Full species lists for the SDZ can be found in Ecological Survey of Clonburriss (FERS Ltd., 2018).
- iii. Details on how the SuDS elements function.
- iv. Drainage and Landscape proposals to be consistent regarding SuDS provision.
- v. Inclusion of all above ground SUDS features in attenuation calculation (avoid underground systems).
- vi. Detention basins to have deeper areas that fill first before being directed underground. Detention basins should have a low flow channel and a sloped face. The base of detention ponds should not be flat, they should include some lower areas to ensure that some areas only remain mucky, and the vast majority of the base of the detention pond can dry out cleanly. Where detention basins have underground tanks, the water should be directed to the detention basin first, followed by the underground tank being allowed to fill for the 1 in 100 year storm.
- vii. Paths in Public Open Spaces used to attenuate water to be a permeable solid surface rather than compacted gravel.

#### **ADDITIONAL INFORMATION**

**REASON: For Climate resilience and to improve amenity and biodiversity on site.** To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.

#### **5. Landscape Plan**

A revised detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of Council's Public Realm Section. The revised landscape plan shall integrate tree planting and SuDS drainage to provide strong green infrastructure links throughout the development in accordance with Clonburriss SDZ Planning Scheme and Parks and Landscape Strategy.

The proposed ornamental shrub planting within Canal Park and Streets/Public Realm; and the proposed ornamental grass planting within the swales would require labour intensive maintenance and therefore are not suitable for Taking in Charge by South Dublin County Council. SDCC can

take in charge Trees, hedgerow, grass, wildflower and bulb areas. Plant species to be predominantly native and/or pollinator friendly.

The revised Landscape Plan should incorporate:

- i. Street trees that are in line with the requirements set out in the Clonburris Strategic Development Zone Planning Scheme (Clonburris SDZ) 2019' and the 'Design Manual for Roads and Streets (DMURS) 2019. Street tree provision to incorporate small scale SuDS features that enhance biodiversity, provide amenity, manage surface water volume while providing water quality treatment.
- ii. Details of street tree planting to be submitted to the Public Realm Section of SDCC for agreement. Urban tree pits to include SUDs measures.
- iii. Street trees Size at planting a minimum of 18 to 20-centimetre girth (cmg) within local streets and a minimum of 16 -18 cmg on intimate local streets (homezones) as per the requirements of the Clonburris SDZ Parks and Landscape Strategy. The developer shall submit cross section details of the tree pits and growing mediums. The tree pits shall include storm water attenuation.
- iv. Retained, removed and compensatory hedgerow to be clearly identified on Landscape Plans.
- v. Parkland/Open Space tree planting to include a range of semi-mature specimens that are a minimum of 20-25cmg and specimen ornamental trees to include trees that are 30-35 cmg.
- vi. Details of all natural SuDS features including further swales, rain gardens, bioretention tree pits, channel rills, filter strips, ponds, detention basins with lower areas allowed to fill first (low flow channels), wetlands etc
- vii. Landscape masterplan/planting plan to clearly delineate street lighting to ensure street tree proposals are realistic. If this is not currently the case, proposals to be revised to ensure street tree delivery.
- viii. Tree and hedgerow protection measures: show extent and position of tree and hedgerow protection fences including protection of all vegetation within the 30m pNHA buffer zone.
- ix. Tree Impact Plan: an updated tree impact plan is required reflect the latest landscape and tree retention proposals, maximising tree and hedgerow within parks and open spaces, particularly the pNHA.
- x. Implementation timetables.
- xi. Grassed areas and slopes need to provide for safe grass cutting (generally 1 in 8 slope, max 1 in 6) with ride on lawn mowers or tractor with a 16 foot mower pulled behind.
- xii. Detailed proposals for the future maintenance/management of all landscaped areas.
- xiii. Lockable (preferably automated) vehicular access to local parks and that maintenance vehicular access is possible where required throughout the park area.
- xiv. full entrance details for pedestrians and cyclists that minimise the need for removable bollards, a line of removable bollards is not an adequate entrance. Where removable bollards are proposed we recommend an extra socket be provided for temporary displacement.

- xv. Northwest Local Park boundary to have railing suitable to public realm, i.e. a low wall with heavy duty round bar, minimum 16mm diameter galvanised and powder coated matt black metal railing, 1.8m high, suitable for public realm.
- xvi. Boundary details and planting to be to taking in charge standard and to be agreed with SDCC Public Realm.
- xvii. Commit to ensuring further measures (defensive planting; native hedging, chestnut paling) are implemented to protect existing vegetation within the pNHA, i.e. at the interface between wilder area of Canal Park and parkland.
- xviii. All areas proposed for taking in charge shall be to a taking in charge standard that ensures ease of maintenance including ease of access. Soft landscape areas intended for taking in charge should predominantly consist of grass, hedges, trees, woodland planting, meadowland or bulb planted areas using predominantly native and/or pollinator friendly species and comply with the requirements of the Clonburris SDZ Biodiversity Management Plan. Trees to be grouped appropriately to enable access to meadowlands for cutting.
  - a. avoid use of ornamental ground cover or ground cover or treatments that need intensive maintenance or herbicide use e.g. For ornamental planting proposed within the Local Park on Drawing No. 1738\_PL\_P\_06 Landscape Site Plan 03 is not suitable for taking in charge.
  - b. extensive areas of herbaceous perennial ground cover should also be avoided.
  - c. minimise the use of shrubs that require regular maintenance
  - d. the exception to the planting criteria above are the planted swales required for SuDS where riparian planting is required. Swales to be planted with wildflowers.
- xix. Open space shrub planting within Canal Park to be native and include pollinator friendly species. Suitable species include hazel *Corylus avellana*, wild privet *Ligustrum vulgare*, guelder rose *Viburnum opulus* and yew *Taxus baccata*.
- xx. Native species should be used for formal hedging proposed within Clonburris SDZ e.g. residential. Suitable species include hazel *Corylus avellana*, wild privet *Ligustrum vulgare*, guelder rose *Viburnum opulus* and yew *Taxus baccata*. *P Lusitanica* is not appropriate.
- xxi. Woodland planting should use the Miyawaki technique (3-5/m<sup>2</sup>) in order to establish quickly and reduce maintenance costs. This will require an establishment period and maintenance of 5 years for newly planted woodland areas prior to taking in charge.
- xxii. Paths to be a permeable solid surface. Extensive use of gravel should be avoided as, at present, it increases maintenance requirements and the potential use of herbicides, alternative surfaces are preferred unless the areas will be heavily trafficked. Loose or bound gravel should be judiciously used.
- xxiii. All playspace surfacing to be engineered woodchip surfacing.
- xxiv. Any sand play areas to be enclosed with fencing.
- xxv. Details of all play items and natural play features to be provided and agreed with SDCC Public Realm Section.

xxvi. The relevant requirements of the Clonburris Parks and Landscape Strategy.

**REASON:** In the interest of amenity, compliance with Clonburris SDZ Planning Scheme, Parks and Landscape Strategy, Biodiversity Management Plan, SDCC Development Plan Policy; the provision, establishment and maintenance of a reasonable standard of landscape; and proper planning and sustainable development of the area.

## **6. Play**

The concept of using natural play is acceptable and we require further detail. Some of the play items and surfacing in the play proposals are not acceptable to Public Realm. SDCC do not recommend impact absorbing rubber wet pour surfacing or grass matting We require:

- i. Incorporation of details that allow for natural play surfaces such as engineered wood chip.
- ii. Sand areas to be enclosed with fencing.
- iii. Details of all play items, natural play features and safety surfacing.

The applicant is recommended to contact Public Realm section to agree details of the natural play proposals.

**REASON:** To uphold the policies of the South Dublin County Council Development Plan 2016-2022 relating to Children's play, and to provide for the proper planning and sustainable development of the area.

## **7. Birds, Bats and other mammals**

The applicant is requested to submit for agreement with SDCC Public Realm and Environment Section, a specific report that addresses the suggested items and measures in the Clonburris Strategic Development Zone Biodiversity Management Plan for birds, bats and other mammals, e.g. requirement for hedgehog passes, bat bricks etc.

Reason: To uphold the biodiversity and green infrastructure policies of the South Dublin County Council Development Plan 2016-2022 and Clonburris SDZ Planning Scheme, Parks and Landscape Strategy and Biodiversity Management Plan; and in the interest of sustainable development.

## **.8. Lighting**

The Clonburris SDZ Planning Scheme requires lighting throughout the SDZ to be at a low level, directional and should follow guidance provided by Bat Conservation Trust (2018) Guidance note 08/18 Bats and artificial lighting in the UK. Clonburris SDZ holds great potential for trialling and installing innovative red lighting. The Grand Canal pNHA buffer zone is a national ecological route and the applicant must demonstrate sensitivity to bats. It is Public Realms preference that open spaces would not be lit unless it can be demonstrated that a specific need such as active travel use exists, This is due to the requirements of the Biodiversity Management Plan.

Prior to the commencement of development all land within the 30m buffer zone is fenced off to protect it. Such an area is very sensitive to development, it should not be used for stockpiling soils or material or for any other storage function. Its should not be dug up or the ground otherwise disturbed.

Reason: To protect trees, hedgerows and planting in the interest of biodiversity, visual amenity and sustainable development

Reason: To uphold the policies of the South Dublin County Council Development Plan 2016-2022, Clonburris SDZ Planning Scheme, Parks and Landscape Strategy and Biodiversity Management Plan, relating to tree protection, biodiversity and green infrastructure and in the interest of sustainable development.

## **SUMMARY**

The proposed scheme in its current configuration does not fully address integrated blue/green infrastructure and would materially contravene the requirements of the Clonburris SDZ Planning Scheme (2019), Parks and Landscape Strategy (2021) and Biodiversity Management Plan (2021) and SuDS/GI objectives in SDCC County Development Plan.

1. Street trees have not been provided in the Public Realm along up to approximately 980m lengths of street resulting in a lack of strong interconnected green infrastructure.
2. Hedgerow has not been adequately retained, replaced and protected in local parks, ~~and~~ public realm and pNHA as part of the green infrastructure network.
3. SuDS have not been adequately designed as an ecological resource and a strong green infrastructure network.

3.4. There is not enough detail to demonstrate impact on bats have been addressed in lighting design.

The proposed development in its current configuration will have a significant detrimental effect on the existing hedgerows and associated biodiversity and ecology and has not gone far enough to integrate strong blue/green infrastructure links throughout.

The Public Realm Section is requesting that the applicant significantly alter the layout of the proposed development in order to ensure that

- I. Street trees are provided
- II. There is maximum retention of existing and/or replacement hedgerows and trees.

III. Further SuDS addressing amenity and biodiversity are integrated through the development

Further detail is also required on natural play and to demonstrate sensitivity to birds, bats and other mammals as outlined in the Clonburris SDZ Biodiversity Management Plan. Lighting design needs to demonstrate bat sensitivity.

The applicant is recommended to contact Public Realm section to agree details on any of the above.

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**Fionnuala Collins**  
**Assistant Parks Superintendent**

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**Endorsed By: Laurence Colleran**  
**Senior Executive Parks Superintendent**