SOUTH DUBLIN COUNTY COUNCIL

INTERNAL MEMORANDUM

Department: **Parks & Landscape Services / Public Realm** Date: **23/02/2022**

Caitlin O Shea
Area Planner
Planning Department

Development: Construction of a residential development comprising 3 three to five storey blocks of 74 apartments (20 one bed, 48 two bed and 6 three bed) all with associated private balconies/terraces to the north/south/east/west elevations; vehicular and pedestrian access from Hayden's Lane to the north west of the site and closure of the second existing vehicular entrance at south west of site; pedestrian access from Griffeen Park to the south east of the site; provision of car and cycle parking, public and communal spaces, bin stores and all associated site development and clearance works, landscaping, boundary treatments and other servicing works.

Location: Hayden's Lane, Adamstown, Lucan, Co. Dublin

Applicant: Jackie Greene Construction Limited

Reg. Ref: SD21A/0359

Recommendation: Additional Information

Site Area

19.2 ha

Zoning **Objective Res** *'to protect and/or provide residential amenity'.*

Main Concerns

1. **Impact of proposed development on existing trees and hedgerows:** Public Realm are concerned about the proposed removal of a mature willow *Salix alba* (T013 - category B2) identified by the Bat Eco Services Bat Assessment (2021) as a having a moderate potential as a bat roost that has been recommended for retention. It is important that every effort is made to retain as much of the existing mature planting and where it is found to be of low value that proposals are made to enhance and maximize the ecological and amenity value. A tree bond will be required for trees agreed for retention.

2. **Potential Ecological Impact – impact of development on bat foraging routes and potential bat roosts.** There are proposals to remove a mature willow tree that has a moderate potential for bat roost. Every effort should be made to avoid removal of this tree. As a condition of planning bat boxes will be required to be installed in Griffeen Valley Park prior to felling of any tree with bat roost potential.

3. **Insufficient Street trees -lacking in the car park areas.** Additional trees are required in the car parking areas to break up hardstanding. SDCC require one street tree every 5 No. perpendicular car spaces and for these trees to have SuDS bioretention tree pits. The current tree pit proposals are not suitable as SUDS tree pits.

4. **Lighting Design** The landscape plans should include proposed external lighting to ensure there is no conflict with proposed tree planting and they are not casting light onto areas of ecological sensitivity.

5. **Conveyance Swale.** Conveyance swale should also act as an attenuation feature, holding water back close to where it falls and creating opportunity for habitat.

6. **Boundary Treatment**
   i) SDCC do not fence off water features within Parkland. The proposed timber post and rail fence along the southern boundary of the site with the Parkland should be removed. We require a planted shelf in this area for safety.
   ii) The proposed fencing alongside the perimeter dry ditch should be removed to allow access for maintenance.

7. **Bridge Detail** We require a detail of the proposed crossing of the water feature indicated as an earth bank in the landscape plan and as a bridge in the cross-section on page 11 of the Landscape Rationale.

8. **Accessible play** The carosel should be replaced by an accessible carosel to address the lack of accessible play. Engineered wood chip is the preferred safety surface for natural play areas.

<u>Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022</u>:

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 ground and surface water quality to meet the requirements of the EU Water Framework Directive.

IE2 Objective 2: To protect the regionally and locally important aquifers within the County from risk of pollution and ensure the satisfactory implementation of the South Dublin Groundwater Protection Scheme 2011, and groundwater source protection zones, where data has been made available by the Geological Survey of Ireland.

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 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 6: To promote and support the retrofitting of Sustainable Urban Drainage Systems (SUDS) in established urban areas, including integrated constructed wetlands.

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

GREEN INFRASTRUCTURE (G) Policy 1 Overarching

It is the policy of the Council to protect, enhance and further develop a multifunctional Green Infrastructure network by building an interconnected network of parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.

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.

GREEN INFRASTRUCTURE (G) Policy 2 Green Infrastructure Network

It is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure and enhance biodiversity, provide readily accessible parks, open spaces and recreational facilities.

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 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 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 riverbank 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 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

It is the policy of the Council to protect and promote the conservation of biodiversity outside of designated areas and to ensure that species and habitats that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 are adequately protected.

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.

11.6.1 Water Management

(ii) Surface Water

Development proposals should provide suitable drainage measures in compliance with the Greater Dublin Strategic Drainage Study (GDSDS) 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 GDSDS 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, soakaways 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.

DMURS (2019)

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 advise with regard to the use of SUDs may be found in the Greater Dublin Strategic Drainage Study (2005).

In relation to the above proposed development, the Public Realm section has reviewed the application and has the following recommendations.

1. Landscape Proposals

The applicant should provide a revised and fully detailed landscape plan, proposals and details that addresses the main concerns outlined above, i.e.

i) Retention of the mature willow tree (T013) with bat roost potential. Appropriate measures such as no dig solutions and/or revised path layout to be proposed. It is important that every effort is made to retain as much of the existing mature planting.

ii) Incorporation of additional street trees within the car parking areas to break up hardstanding. SDCC require street trees every 5 No. perpendicular car park spaces.

iii) SuDS bioretention Tree pits to be installed in trees within /draining areas of hard standing. Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SUDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to contact Public Realm section for tree pit details and refer to the recently published '*SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'.*

iv) Landscaping details of the conveyance swale referred to on Drainage Drawings to be included in the landscape plans. This swale should also act as an attenuation feature, holding water back close to where it falls and creating opportunity for habitat. Planting proposals are required, for example, riparian wildflowers.

v) Planting plan and section through southern attenuation swale showing profile and planting on southern side for safety reasons. Refer, '*SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'.*

vi) Proposed external lighting to ensure there is no conflict with proposed tree planting and light is not cast onto areas of ecological sensitivity.

vii) Removal of the proposed timber post and rail fence along the southern boundary of the site with the Parkland and removal of the proposed fencing alongside the perimeter dry ditch to allow access for maintenance.

ADDITIONAL INFORMATION

2. <u>Detailed Bridge Design</u>

We require a detail including section of the proposed crossing of the water feature. This is indicated as an earth bank in the landscape plan and as a bridge in the cross-section on page 11 of the Landscape Rationale. Although SDCC do not normally fence off watercourses in Parkland, the proposed flat bar metal railing boundary treatment could continue beyond the site access to the site for a short stretch along the water feature where it interfaces with the public open space to create an access feature.

ADDITIONAL INFORMATION

3. Lighting Design

Detailed lighting proposals are required that comply with the recommendations of the Bat Eco Services Bat Assessment (2021) who has highlighted this element of the application as an important aspect in relation to local bat populations.

ADDITIONAL INFORMATION

4. Play

a) Detailed play proposals should include accessible play features. We require:

i. An accessible play feature - the proposed carosel could be replaced with and accessible carosel.
ii. Tree trunks to be seasoned hardwood, logs to be branched and minimum 4m long
iii. Large (1 tonne) boulders to be placed flat-side up to enable play
iv. Engineered wood chip is the preferred safety surface for natural play areas.

b) Details of play proposals to be agreed with Public Realm.

c) Details of all play equipment, and safety surface, along with specifications and proof that all equipment conforms to ***European Standards EN 1176-1-11*** and **EN 1177 *Playground equipment and surfacing*** shall be submitted.

d) Post installation certification by the Register of Play Inspectors International (RPII) will also be a requirement for all play areas.

ADDITIONAL INFORMATION

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.

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Fionnuala Collins
Assistant Parks Superintendent

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Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent