

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Planning Officer:	CIARAN STANLEY
Development:	Relocation of the existing Clondalkin RFC grounds at Gordon Park to new lands at Kingswood Farm, Moneenalion Commons Lower Clondalkin and comprising of 4 new rugby playing pitches, including a high quality main competition pitch (with modern directional floodlighting comprising 18m high floodlighting columns either side) and a high quality Junior pitch both laid approximately level, and two back pitches as well as various grassed rugby training areas all laid on existing land cross fall levels; change of use of existing agricultural shed to accommodate new two storey changing facility and storage areas; a new two storey Clubhouse Pavilion with supporting facilities including dressing rooms, physio rooms, coffee dock, committee rooms, members bar and lounge, plantroom and toilets; all associated site development sustainability and infrastructure work including connection to existing public foul sewer, SUDs, sedum roof and PV roof panels; new landscaping throughout the site comprising trees, hedges and wild flower areas; new cycle track and pedestrian access and stairs off the R136, bicycle shelter, children's playground area, electrical car charging stations, vehicle parking and new vehicle entrance off the Old Country Roadway.
Location:	Kingswood Farm, Moneenalion Commons Lower, Clondalkin, Dublin 22
Applicant:	Clondalkin Rugby Football Club Ltd.
Reg. Ref:	SD21A/0081
Report Date:	11th May 2022
Recommendation:	SIGNIFICANT ADDITIONAL INFORMATION
Site Area:	9.6 ha

Zoning: To protect and improve rural amenity and to provide for the development of agriculture

Main Concerns:

1. Significant impact on trees, hedgerows and biodiversity in an area that is zoned rural. A tree and hedgerow survey, arboricultural impact assessment and tree protection plan has not been provided and proposed mitigation not quantified. There should be an overall net gain of trees and hedgerows.
2. Potential impacts on bats – significant lighting proposed.
3. Lack of information submitted in relation to the landscape scheme for the proposed development.
4. Insufficient detail for integrated SuDS (Sustainable Drainage System) that provide for biodiversity and amenity as well as a water quality treatment train and attenuation shown for the proposed development.
5. proximity of proposed development ($\leq 10\text{m}$) to the Camac River located along the North Western boundary of the site.

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

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 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 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 & ENVIRONMENTAL QUALITY (IE)

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 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

Policy 3 Watercourses Network

It is the policy of the Council to promote the natural, historical and amenity value of the County's watercourses; to address the long term management and protection of these corridors and to strengthen links at a regional level.

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.

Policy 4 Public Open Space Hierarchy and Landscape Setting

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.

Policy 5 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.

Chapter 9 HERITAGE CONSERVATION AND LANDSCAPES

Policy 15 Non-Designated Areas

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.

Chapter 11 IMPLEMENTATION

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.

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.

The Public Realm Section has assessed the proposed development in accordance with the CDP and best practice guidelines and recommends the following significant additional information be provided:

1. Arboricultural Assessment

There are concerns about the lack of information in relation to existing trees and hedgerows within the site and within falling distance of the Proposed development. There appears to be a significant impact on trees, hedgerows and biodiversity in an area that is zoned rural. The proposal development involves the removal of mature native hedgerows and construction adjacent to existing trees and hedgerow.

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

- i) Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- ii) 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
- iii) 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).
- iv) Design Iteration - Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate
- v) 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.

- vi) 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.
- vii) 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.
- viii) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- ix) The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.
- x) Trees and hedgerows within and within falling distance of the proposed development area to be surveyed.
- xi) The report should indicate what is proposed to mitigate proposed removals and protect that which is to be retained.

Reason: To ensure the protection of trees to be retained on site in the interests of amenity, ecology, climate adaptation, proper planning and sustainable development.

SIGNIFICANT ADDITIONAL INFORMATION

2. Landscape /Blue-Green Infrastructure

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.

- i) 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 Masterplan should be to scale of not less than 1:500 showing –
 - a. The species, variety, number, size and locations of all proposed planting
 - b. Details of Hard landscape works, specifying surface material and furniture
- ii) Details of natural SuDs features including swales, permeable paving, green roofs and bioretention tree pits etc.

- iii) Detailed Sections and Elevations
- iv) Specifications for mounding, levelling, cultivation and other operation associated with plant and grass establishment
- v) A timescale for implementation
- vi) The applicant should propose for example, mitigation planting for proposed tree and hedgerow removal; protection of trees and hedgerows to be retained; proposals for planting along the banks (minimum 10m setback riparian zone) of the River Camac; enhancement of existing hedgerows; additional infill planting; creation of new habitat; integration of SuDS features into the landscape; boundary planting. There should be a net gain of trees and hedgerow.
- vii) Planting to be predominantly native and /or pollinator friendly species that support the local Bat population.
- viii) Existing green infrastructure links should be maintained.

Reason: In the interests of amenity, ecology, climate action and sustainable development.

SIGNIFICANT ADDITIONAL INFORMATION

3. Ecological Impact – Bat Survey

There are concerns with the lack of information submitted in relation to ecology given the rural nature of the site and presence existing trees and hedgerows. The applicant is requested to submit a full bat survey as recommended in the Ecological Impact Assessment dated 21st December 2021.

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

SIGNIFICANT ADDITIONAL INFORMATION

4. SUDS

There is insufficient detail for SuDS (Sustainable Drainage System) shown for the proposed development. Further natural SUDS features shall be incorporated into the proposed drainage system and a strategy provided. 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 South Dublin County Council Development Plan 2016-2022. A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A

maintenance plan shall also be included as a demonstration of how the system will function following implementation. In addition, the applicant shall provide the following:

- The applicant shall show further proposed SuDS features for the development such as Green roofs, grass areas, bioretention tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS
- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

The applicant is referred to the recently published SDCC Sustainable Drainage Explanatory Design and Evaluation Guide for further information and guidance.

REASON: In the interest of Amenity, biodiversity, water quality and attenuation; compliance with Development Plan Policy; the provision, establishment and maintenance of a reasonable standard of blue-green infrastructure and proper planning and sustainable development of the area.

4. Camac River - Riparian Zone/Set back

The applicant is advised that the Public Realm Section has some concerns in relation to the impact of the proposed development on biodiversity, in particular, the set back from the river and loss of existing hedgerows. In this context the applicant is requested to submit the following:

- i) A re-designed site layout plan showing the proposed pitches set back a minimum of 10m from the top bank of the Camac River as per Green Infrastructure G3 Objective 2 of the South Dublin County Development Plan 2016-2022. The River Camac to be clearly shown on design drawings.
- ii) Site specific riparian planting proposals along the riverbank in order to enhance and protect the Green/Blue infrastructure of the site and to provide biodiversity and habitat enhancement measures.

SIGNIFICANT ADDITIONAL INFORMATION

Summary

The Public Realm Section has concerns about the lack of information in relation to the impact of the development on existing trees and hedgerows; bats; the River Camac, landscape proposals and SuDS.

The Public Realm Section is requesting that the applicant provide significant additional information such that the sustainability of the development can be assessed for compliance with the policies and objectives of the County Development Plan.

Fionnuala Collins

Assistant Parks Superintendent

Laurence Colleran

Senior Executive Parks Superintendent