

CUNNANE STRATTON REYNOLDS

Ref: 21578 / DOL

Planning Department,  
South Dublin County Council  
County Hall  
Tallaght  
Dublin 24

13 April 2022

Dear Sir / Madam

**RE: Planning Ref SD21A/0327 - Site at Gordon Park, Old Naas Road, Kingswood, Dublin 22  
Additional Information Request – Landscape Issues**

Please find enclosed the following revised and additional drawings and Landscape Design Statement in response to the requests for additional information as related to landscape aspects of the planning application.

21578-2-101 Landscape Masterplan Rev H  
21578-2-102 Play Area Details Rev D  
21578-2-103 Landscape and Services Rev D  
21578-2-104 Boundary Treatment Rev D  
21578-2-105 Tree Taken in Charge Rev A  
21578-2-201 Roadside Elevation and Open Space Sections Rev E  
21578-2-700 Planting Details  
21578-2-701 Detail of Communal Tree Garden and SUDs Tree Pit  
Landscape Design Statement Rev E April 2022

#### Item 5

The impact of the proposed development on the existing trees contained within the development site is not acceptable to the SDCC Public Realm Section, and would contravene policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 and other GI policies and objectives in the County Development Plan. The current proposal would have a negative impact on existing trees within the development site area. The proposed development will require the removal of 38 no. trees and a large section of existing hedgerow.

The applicant should provide a response which should include a revised layout to significantly reduce the impact of the proposed development on the existing mature trees, in particular addressing:

- (a) those trees located along the western boundary which are proposed to be removed.
- (b) The proposal provides for the removal of a number of mature trees and boundary hedgerows, particularly to the south-west of the site, which would erode the existing sense of privacy for adjoining residents. To facilitate a proposed row of houses to the south-west (units 16 to 23), it is proposed that a row of trees and hedgerow would need to be removed. These could be better retained in, for instance, communal or public amenity space. In combination with the general concern for loss of trees arising from the development, the applicant is requested to address potential alternatives at this location which would allow for the retention of these trees.

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Response

Please see Drawing No 21578-2-101 Landscape Masterplan and Arborists report and impact statement. For clarity please note the following:

- (i) The only native hedgerow on the site is located along the eastern boundary where it stretches for approximately  $\frac{3}{4}$  of this boundary. It is proposed to retain all of the boundary most of which will abut a proposed open space which will create no conflicts. A small stretch is maintained very close to the side garden boundaries of two new houses. This will require special construction techniques for the boundary to avoid strip foundations and severe cutting back of the hedgerow to allow access and construction locally, however it is intended to allow the hedgerow regrow to maintain this feature and ecological connectivity.



Figure 1 – Rotated extract from Dwg 21578-2-101 Landscape Masterplan showing Eastern boundary and retained hedgerow

- (ii) The AI refers to the removal of a hedgerow / row of trees to the south west boundary to facilitate a row of houses. The Arborists Report describes these as an Overgrown and Unmanaged Leyland Cypress hedge with a small number of Sycamore trees amongst them.



These are of poor quality and the dense Leyland conifers of no visual, amenity or ecological value. These will be removed to facilitate the new housing backing on to existing housing in accordance with best practice and Secure by Design principles.

- (iii) A small group of mature trees are found along the site boundary with the Old Naas Road to the west. These are growing in the public verge to the side of the road rather than within the site. The Arborists report recommends that these trees be removed as they are in poor condition, however they provide an attractive feature approaching Kingswood generally and to the site frontage in particular, creating a "village" character. A small cluster of trees will be removed to facilitate site access, however the remainder will be retained and the works have been designed and further changed to minimise impacts on their health.

**Item 6**

The applicant is requested to provide the following additional information as required by the SDCC Public Realm Department:

**(a) Landscape Plan**

- (i) The applicant is requested to submit a plan which clearly delineating communal and private spaces should be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.
- (ii) The applicant is requested to submit level details for the open space, this shall include cross section drawings where applicable. If retaining walls are required, they shall be located outside the open space.
- (iv) Details of tree planting pits to include SUDs measures in urban tree pits
- (v) Detailed planting plan.

**(b) Planting Proposals**

Planting should be predominantly native and pollinator friendly where possible, street trees to be minimum 18-20cm girth and open space trees to be 20-25cm girth, specimen/feature trees should ideally be 30-35cm girth. Street trees where possible should contain SUDS features and be planted within the public realm. The applicant should have suitable tree pits that attenuate water within hard surface areas. The applicant should clearly outline how SuDS features within the tree pits will function. Details of constructed/bio retention tree pits to be used to be provided. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape. Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting schemes. Response should include revised layout and drawings.

**(c) Children's Play**

Additional play provision shall be provided for within the proposed development. An emphasis shall be on active, accessible play throughout the development. The applicant is requested to provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. The applicant shall provide further details in this regard.

Following a review with Laurence Collieran of SDCC Parks of the information previously submitted addressing the above points, the incorporation of changes in relation to tree sizes as requested, and changes required as a result of other variations to the scheme, we understand that SDCC Parks are satisfied that the information required is now attached to this AI submission. The revised plans also include additional trees in the public realm – in a number of build-outs within the

streetscape - and the retention of several street trees and associated green spaces, originally within the private curtilage of the houses, as areas to be managed centrally by the projects management company rather than allocated to private residences. These areas will be railed off to ensure the legibility of this distinction and the long-term sustainability, in particular, of the new street trees to maturity. The proposed tree pits and bioretention area will incorporate SuDs functions to generate additional surface water storage on the site.

The introduction of the tree pits, bioretention area, and filter strips coupled with the previously proposed SuDS features such as permeable paved driveways and infiltration trenches have generated sufficient additional surface water storage on the site to allow the footprint of the sub-surface attenuation tanks in the public open space to be reduced by circa 20%. Refer to the Engineers Surface Water/SuDS Management Plan and surface water drawings that accompanies this submission for further details on the proposed SuDS features.

These proposals can be seen in more detail on Drawing Nos. 21578-2-101 Landscape Masterplan Rev F; 21578-2-105 Tree Taken in Charge and SUDs Tree Pit; 1578-2-701 Detail of Communal Tree Garden and the Landscape Design Statement Rev C April 2022. And in the Engineers SUDs and Surface Water Drainage proposals

**Item 7**

The SDCC Public Realm Department has noted a number of concerns relating to the related issues of water attenuation, SUDs, and public open space. The applicant is requested to provide additional information to address the following points:

**(a) The issue of surface water attenuation is a significant concern for the Public Realm Section. All the proposed attenuation tanks are situated under areas identified as public open space; a large portion of the public open space areas are underlain by these tanks. This approach is not considered acceptable to the Public Realm Section. The proposal places severe limitations on the potential use and landscaping of the open space into the future. When the area of the attenuation tanks is taken from the public open space area provision then there is potentially a significant shortfall in terms of the open space provided and the standards contained in the South Dublin County Development Plan 2016-2022. The location of these tanks on the open space reduces both the amenity and usability of the open space provided. Revised proposals with regard to the proposed location of the attenuation tanks within the open space areas to be provided by the applicant. Further consideration of the breakdown in provision of open space and the location and size of attenuation tanks needs to be carried out. Response should include revised layout and drawings.**

**(b) The applicant is requested to submit revised plans to include the following:**

**(i) Significantly reduce the impacts of the development on existing green infrastructure especially the mature boundary trees within the proposed development site**

**(ii) Demonstrate how natural SuDS features can be incorporated into the design of the proposed development**

**(iii) Green infrastructure proposals that will mitigate and compensate for the impact of the proposed development on the existing boundary trees. These proposals should include additional landscaping, SUDs measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds, construction/bioretention tree pits etc.) and planting for carbon sequestration and pollination to support the local Bat population. Response should include revised layout and drawings.**

**(c) 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.**

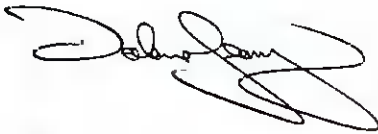
**Additional natural SuDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits. In addition, the applicant is requested to provide the following:**

- (i) Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.**
- (ii) Street Trees should be planted in public open space with suitable tree pits that incorporates SuDS features**
- (iii) Tree pit incorporating SUDS features should include a deep cellular water storage/attenuation area below the surface which acts as a soak away allowing surface water to infiltrate into the ground.**

As described in relation to Item 6, additional trees in the public realm with SUDS function and other additional swales and infiltration tranches have allowed the footprint of the sub-surface attenuation tanks in the public open space to be reduced by circa 20%.

We trust the above addresses the landscape related FI issues as set out above.

Yours sincerely



Declan O'Leary  
Director  
**CUNNANE STRATTON REYNOLDS**