

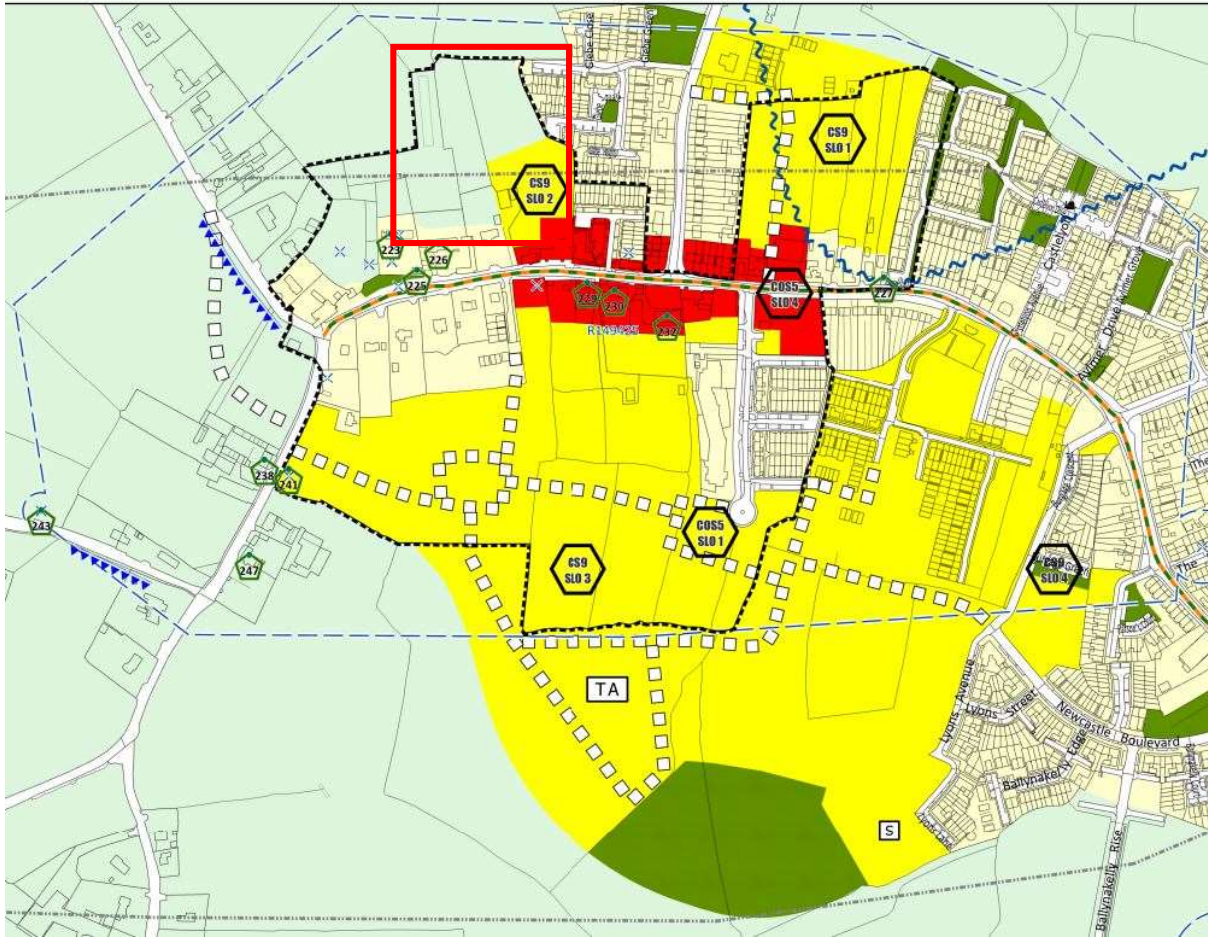
SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Development:	Demolition of 2 sheds and the construction of 30 dwellings; 1 vehicular and pedestrian link with Main Street, Newcastle; vehicle and pedestrian link with Glebe Square, Newcastle and all associated and ancillary site development works
Location:	Main Street, Newcastle, Dublin
Applicant:	Deane and Deane Ltd
Reg. Ref:	SD22A/0286
Report Date:	18th Aug 2021
Recommendation:	REFUSAL
Site Area:	1.35 ha
Zoning:	<u>Objective Res-N</u> - To provide for new residential communities in accordance with approved Local Area Plans <u>Objective VC</u> – To protect, improve and provide for local Village Centres <u>Objective RU</u> - To protect and improve rural amenity and provide for the development of agriculture





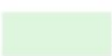


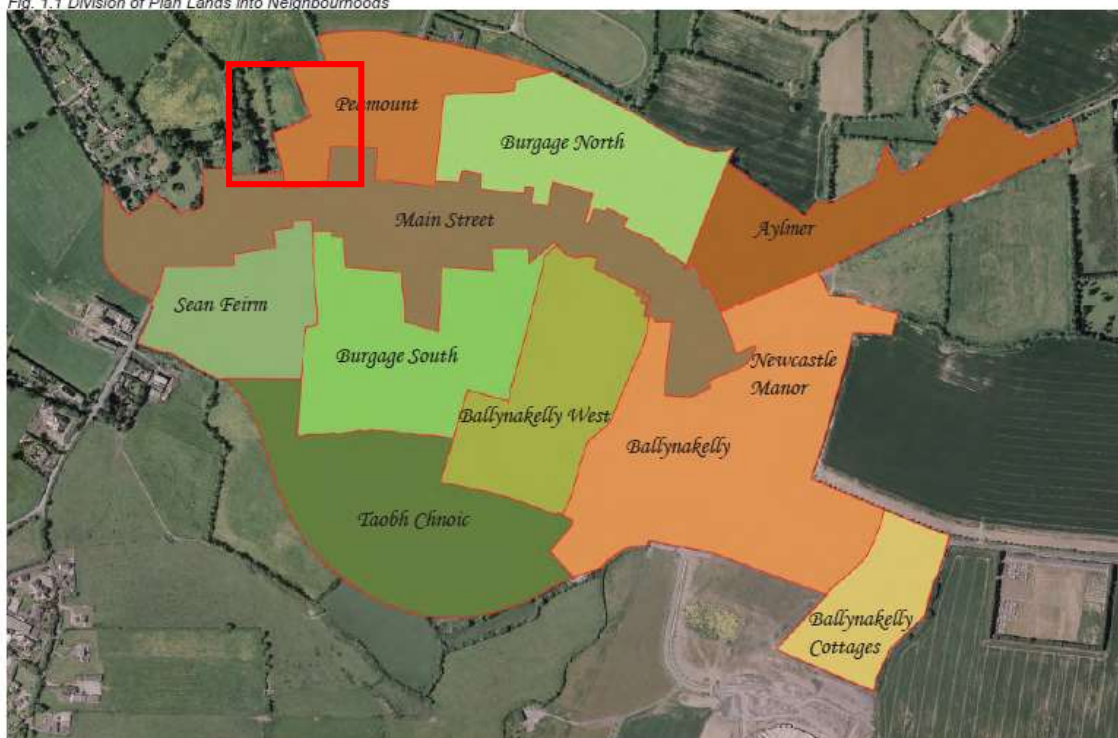
 Objective RES-N	 Objective VC	 Objective RU	 Specific Local Objective
 Public Right of Way			

Figure 1 Extract from SDCC County Development Plan 2022-2028

Newcastle LAP Character Areas: Village Expansion

Newcastle LAP Neighbourhood: Area 8 - Peamount (Area 8) and Area 1 Main Street (West)

Fig. 1.1 Division of Plan Lands into Neighbourhoods



Main Concerns:

- 1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity.**
The proposals involve the removal of trees and hedgerow including a townland boundary hedgerow that does not comply with Newcastle Local Area Plan and SDCC County Development Plan 2022-2028.
- 2. Impacts on bat commuting and foraging routes and roosts**
Green infrastructure used for commuting and foraging bats and trees with potential bat roosts identified in the Faith Wilson Bat Survey Report, May 22 are proposed for removal. There is a lack of integrated design – the landscape proposals do not integrate the recommendations of the Bat Report.
- 3. Ecological Impacts**
There is a lack of integrated design – the landscape proposals do not integrate the recommendations of the Ecological Impact Assessment.
- 4. Does not comply with SDCC GI Strategy**
A GI Strategy has not been provided showing GI on site and the local context. The proposed street design is not DMURS compliant. There are no street trees.
- 5. Greening Factor not provided.** *The applicant has not submitted any information in relation to the Green Space Factor. This is a requirement of the SDCC County Development Plan 2022-2028.*
- 6. Does not comply with SDCC SuDS Guidelines**
The proposed system is largely ‘pipe to pond’ rather than an overland flow/treatment train system; involves the removal rather than integration of green infrastructure, is lacking in source control; includes an underground tank; fails to provide the required information e.g.

show existing and proposed flows. The proposed drainage system does not deliver multifunctional benefit as required by SuDS.

7. **Lack of usable and functional usable open space.** The new SDCC County Development Plan requires a minimum 15% useable open space is required. The area to the west proposed as public open space is not useable as public open space. Other areas are considered to be incidental strips rather than public open space. At pre-planning stage the developer was advised by the Senior Planner that vehicular access is to be via the Glebe development to the north. Access off Main Street is to be pedestrian/cycle and this area to be designed to create significant threshold area that could be considered as Public Open Space. This has not been proposed. Landscape proposal lack details in general – no detail plans, cross sections, play detail – natural and accessible play required not just equipment, swales, tree pits etc.

8. **Lack of Play Provision** – No play areas have been provided. SDCC County Development Plan (2022-2028) requires: *‘Residential developments of 30 units or over shall include provision for children’s play in semi-private or public open spaces, at the discretion of the Planning Authority, through provision of a Young Children’s Area for Play (YCAP), or a Local Equipped Area for Play (LEAP) or a natural play area. Where publicly accessible these will be taken-in-charge by the local authority.*

In order to be compliant with the Newcastle Local Area Plan (2012) and the South Dublin County Council Development Plan (2022-2028) and the proposals need to comply with the following requirements:

Neighbourhood area 8: Peamount Local Framework: Historic Hedgerows to be retained

Fig 6.18 Peamount - Local Framework

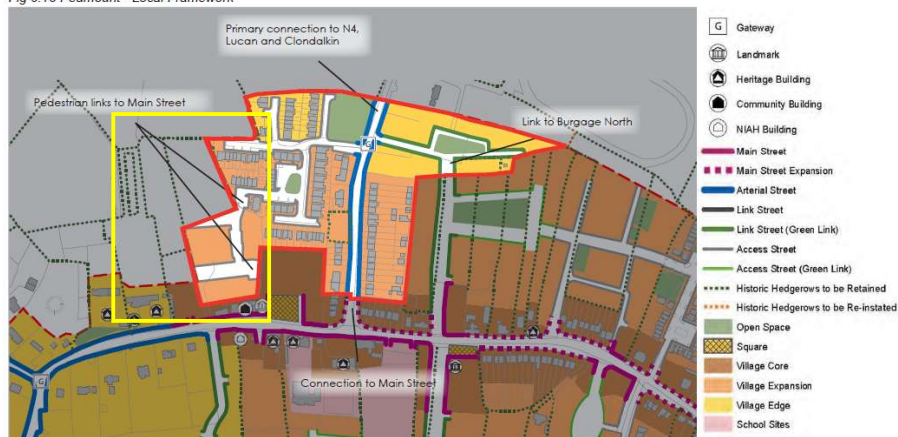


Figure 6.18 shows ‘Historic hedgerows to be retained’ include the entirety of Hedges 1 and 2 (partly hidden under the red Peamount Boundary)

Neighbourhood area 1: Main Street West

Fig 6.4 Main Street (West) - Local Framework

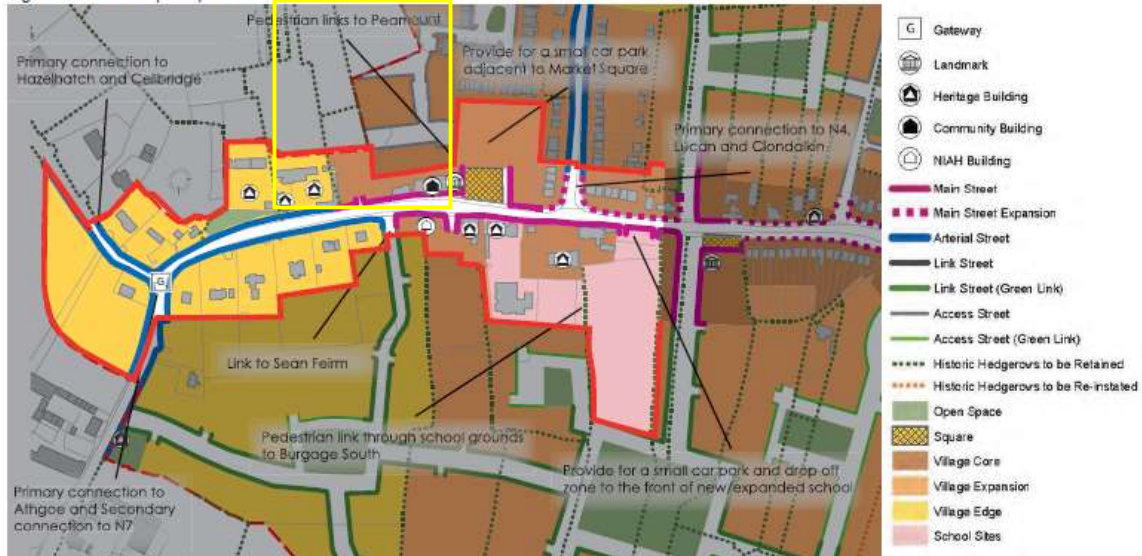


Fig. 6.5 Main Street (West) - Indicative Layout



Village Expansion

Objective LUD7 Development within the Village Expansion area shall be sensitively consolidated within the burgage plot field system in a manner that retains field boundaries and enhances and protects biodiversity. Where burgage boundaries have been removed previously, these shall be reinstated as part of any new development.

Policies/Objectives for Green Infrastructure

Objective GI 1 A linked open space hierarchy shall be implemented fully across the Plan Lands and all proposed developments shall contribute to the achievement of this integrated Green Infrastructure Network where relevant and at a minimum rate of 14% on A1 zoned lands. Where there is a shortfall in public open space provision, from planned local and neighbourhood parks, this shortfall shall be

taken up by pocket parks that are integrated into the design of neighbourhoods. Pocket parks shall be adequately overlooked and shall be easily accessible from surrounding housing but shall not comprise residual open spaces.

NOTE: the new SDCC County Development Plan 2022-2028 requires a minimum of 15% Public Open Space in Res-N Zoned Lands.

Objective GI 2 All proposed public open spaces shall have a clear role and function that falls within the Plan's open space hierarchy detailed under Table 5.1 and shall comply with the qualitative standards detailed under Sustainable Residential Development in Urban Areas, 2009.

Play facilities shall be provided at a rate of 3 sq.m per dwelling and in accordance with Planning Guidance on Provision of Children's Play Facilities in New Developments, 2007. (Objective GI3)

Retention, incorporation and Reinstatement of Burgage Plot Field System

Objective GI7 Protect the historic burgage plot boundary and townland delineations (including townland boundaries to the Glebe, Ballynakelly Newcastle South and Commons Little) around Newcastle Village including their associated hedgerows and ditches.

Objective GI8 Require all planning applications for development on lands that include or are bound by burgage plot and/or townland hedgerow boundaries and ditches to clearly detail how these boundaries will be enhanced or reinstated and incorporated. All such applications shall include a comprehensive hedgerow survey and method statement (compiled by a suitably qualified person) for protection, incorporation and reinstatement of the historic boundaries before, during and after construction. This shall include for details on protecting any section(s) of hedgerow outside the application site that directly adjoin the application site.

Objective GI9 Require that burgage and townland field boundaries and ditches are utilised wherever possible as SUDS elements such as swales for conveying water; landscape features; and biodiversity-protecting elements.

Objective GI10 Allow for limited sections of field boundaries (burgage and townland) to be carefully altered where a need has been clearly demonstrated on the basis of a requirement for accessibility in terms of pedestrian and cyclist movement and the creation of successful streets and spaces. Where this occurs, high quality design cues that signal and delineate the pre-existing plot line of the section of removed hedgerow boundary shall be utilised such as a change in materials with the use of high-quality materials like cut stone and the use of lighting strips etc.

Objective GI11 Where removal of a section of hedgerow is required for street access, the street width and gap in the hedgerow shall be kept to a minimum and determined by street typology (see street design cross sections and typologies in Appendix 3) in order to protect and retain foraging routes for bats. Mature street planting should also be located to help fill the void between sections of hedgerow and create an 'eco hop' across each street as detailed in Section 7 of this Plan.

Policies/Objectives Water, SUDS

Objective GI 12 To promote the sustainable collection and on-site retention of surface water for delayed discharge to the local water system and for use as an on-site resource and as a means of creating a biodiversity network that will retain and develop existing flora and fauna.

Objective GI 13 That a linked SUDS network shall be implemented fully across the Plan Lands in accordance with national and regional SUDS requirements including the Greater Dublin Strategic Drainage Study Initiative and all proposed developments shall contribute to the achievement of this integrated network in order to reduce surface water run-off and to minimise the risk of flooding of the Plan Lands and surrounding lands. This shall include for a series of attenuation wetland areas in parklands that will collect surface water from the developed SUDS network prior to it feeding the stream system to the north of the Village.

Objective GI 14 That all development shall incorporate on site SUDS technologies detailed in the Standards Section (Section 7) of this Local Area Plan such as porous grass paviers, green roofs, rainwater recycling systems and soakaways.

Objective GI 15 That existing natural swales, ditches and hedges shall be retained to form an integral part of the overall SUDS network.

Objective GI 16 That SUDS elements such as swales, detention and retention basins and other landscape-based attenuation features be planted with suitable riparian vegetation and water tolerant tree planting that will clean and attenuate surface water flow. The planting of such species will be particularly required within parkland areas and along the east-west running SUDS elements in order to help intercept and direct waterflows.

Objective GI 17 That all swales utilised within the SUDS network shall be of an appropriate (shallow and wide) dimension to allow for ease of maintenance including mowing and shall be designed in the interest of health and safety where practical.

Natural Heritage including Green Links

Objective GI27 Ensure that all extensive development proposals maximise the opportunities for enhancement of existing ecology and biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that **includes measures to enhance ecology and biodiversity and avoid or minimise loss to local ecology and biodiversity.**

Objective GI28 To require the submission of a Bat Survey as part of every planning application for development (excluding house extensions) within the Plan Lands **and require the implementation of appropriate mitigation measures that ensure for the protection of bats and their habitats.**

Objective GI29 *To require the planting of mature native trees along both sides of streets located within the foraging and flight routes of bats in a manner that creates links between retained and augmented hedgerows and creates 'eco hop' opportunities across streets as detailed in Section 7 of this Plan.*

Objective GI30 *To encourage the planting of native species to reinforce the natural habitats of bats within Newcastle and its environs.*

Objective GI31 *To create an open ended and integrated network of walking and cycle routes that promotes universal access for all and permeate the Plan Lands in a manner that coincides with biodiversity corridors and SUDS features. These routes shall form heritage trails that use natural and built heritage features to link a necklace of parks, open spaces and landscaped squares.*

Objective GI32 *To ensure that the transition between built development and the open countryside is sensitively treated, large open spaces and low density housing set amongst heavily landscaped streets shall be provided along the undeveloped fringes of the Plan Lands. This will require the augmentation*

of existing hedgerows with planting of streets and spaces with mature and semi-mature native tree species prior to the occupation of dwellings.

Peamount neighbourhood division of the Newcastle Local Area Plan lands.

Objective PN4 *Include for the permitted soft landscaped through route to the rear of Main Street and St. Finian's Hall and upgrade such as a link with the Village Core.*

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2022 - 2028:

GI1 Objective 1: *To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.*

GI1 Objective 2: *To implement and monitor the South Dublin County GI Strategy during the lifetime of this plan and develop a fit for purpose GI scoring for the County which will support ongoing identification, protection, enhancement and management of GI in the County and which will enable the assessment and monitoring of GI interventions in the County.*

GI1 Objective 3: *To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.*

GI1 Objective 4: *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.*

GI1 Objective 7: *To develop linked corridors of small urban 'Miyawaki' native mini-woodlands, a minimum of 100 sq m in size, to capture carbon and encourage biodiversity in suitable existing built-up areas, in low grade parkland, and other areas of zoned lands where deemed suitable and appropriate.*

GI1 Objective 8: *To increase over the lifetime of this plan the percentage of land in the County, including residential, managed for biodiversity including supporting the delivery of the objectives of the County Pollinator Plan and to continue to investigate the potential for the use of low-mow methods during the lifetime of the Plan.*

Policy NCBH2 Biodiversity: *Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.*

NCBH5 Objective 1: *To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.*

NCBH5 Objective 2: *To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.*

Policy NCBH10: Invasive Species *Protect against and prevent the introduction and spread of invasive species within the County and require landowners and developers to adhere to best practice guidance in relation to the control of invasive species.*

NCBH10 Objective 1: *To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and / or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477 / 2011).*

NCBH11 Objective 3: To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.

NCBH11 Objective 4: To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4: Green Infrastructure).

Policy GI2: Biodiversity

GI2 Objective 1: *To reduce fragmentation and enhance South Dublin County’s GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.*

GI2 Objective 2: *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

GI2 Objective 3: *To retrospectively repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network through the implementation of new GI interventions.*

GI2 Objective 4: *To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.*

GI2 Objective 5: *To protect and enhance the County’s hedgerow network, **in particular hedgerows that form townland, parish and barony boundaries** recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for **no net loss of hedgerows on any development site** and to take a proactive approach to protection and enforcement.*

GI2 Objective 6: *To continue to support and expand the County Pollinator Plan through the management and monitoring of the County’s pollinator protection sites as part of the Council’s commitment to the provisions of the National Pollinator Plan 2021-2025.*

GI2 Objective 7: *To enhance the biodiversity value of publicly owned hard infrastructure areas by incorporating the planting of new trees, grasses and other species, thereby integrating this infrastructure into the overall GI network.*

GI2 Objective 8: *To take all possible steps to mitigate the impacts on biodiversity of increased recreation within the GI network, bearing in mind the effects of scramblers, dogs, drones, littering and illegal dumping.*

GI2 Objective 10: *To enhance biodiversity and the health of pollinator species by banning the use of glyphosphate in or close to public parks, public playgrounds, community gardens / allotments and within residential estates, whether by directly employed Local Authority staff or private contractors*

POLICY GI4: SUSTAINABLE DRAINAGE SYSTEMS

Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.

GI4 Objective 1: *To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.*

GI4 Objective 2: *To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.*

GI4 Objective 3: *To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.*

GI4 Objective 4: *To require that all SuDS measures are completed to a taking in charge standard.*

GI4 Objective 5: *To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network.*

GI4 Objective 6: *To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Drainage Systems (SuDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.*

COS5 Objective 20: *To ensure that children's play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 12: Implementation and Monitoring. Chapter 12: Implementation and Monitoring.*

12.6.10 PUBLIC OPEN SPACE

Children's Play Areas

The Council will require children's play areas to be provided as an integral part of the design of new residential and mixed-use developments, to be addressed as part of a landscape plan. The minimum requirements for provision of play facilities are as follows:

- *All public and semi-private open space (regardless of the type of development it serves) will be required to incorporate play space;*
- *Residential developments of 30 units or over shall include provision for children's play in semi-private or public open spaces, at the discretion of the Planning Authority, through provision of a Young Children's Area for Play (YCAP), or a Local Equipped Area for Play (LEAP)*

or a natural play area. Where publicly accessible these will be taken-in-charge by the local authority.

- *New play spaces should generally be based on the principles of natural play; à More formal equipped play areas may be appropriate in urban contexts or in the case of larger play facilities;*
- *Play spaces should be carefully sited within residential and built-up areas generally so that they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residents;*
- *Play spaces should be designed to enhance the visual appearance of an area;*
- *Robust natural materials that are less susceptible to vandalism should be used wherever possible;*
- *Play spaces should cater for a wide range of age groups and abilities and be universally accessible;*
- *Suitable provision for teenagers should be considered in the context of the Council's Teenspace Programme (2021), or any superseding document.*

For further relevant objectives refer SDCC County Development Plan 2022-2028

SDCC Living with Trees – Tree Management Policy 2021 – 2026

South Dublin County Council's Tree Management Policy 'Living with Trees' 2021-2026 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 and with the Councils Open Space Development and Taking in Charge.
- 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 Refusal based on the main concerns outlined above. In the event that the Planning Authority are seeking additional information the following should be requested:

1. Arboricultural Impact of the Proposed Development

The extent of the proposed tree and hedgerows removals 68 % of trees (32 of 47 No.) and 110m of hedgerow including those following field and townland boundaries is not acceptable to the Public Realm Section and would materially contravene the policies and objectives of Newcastle Local Area Plan (2012) and SDCC CDP and would recommend that permission be REFUSED. In the event that the Planning Authority are seeking additional information the following should be requested:

- i. A full re-design to locate all development away from existing hedgerows and significant stands of trees and or integrate this proposed development into the existing trees and hedgerows on site more sensitively ensuring that the majority of the existing vegetation on site are retained and protected. Every effort should be made to retain existing trees and hedgerows where possible as this network of existing trees and woodlands provides corridors for biodiversity and habitats for existing flora and fauna.
- ii. Revised proposals to include an updated Arboricultural Impact Report and Plan, Tree Protection Plan and Arboricultural Method Statement.

A Tree and Hedgerow Bond will be required for trees and hedgerows to be retained.

ADDITIONAL INFORMATION

2. Green Infrastructure

The submitted plans conflict with the County's Green Infrastructure Strategy. Please refer to Chapter 4 of the County Development Plan: [chapter-4-green-infrastructure.pdf \(sdcc.ie\)](http://www.sdcc.ie/chapter-4-green-infrastructure.pdf)

GI1 Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

GI2 Objective 2: To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new

developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.

GI2 Objective 4: To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.

GI2 Objective 5: To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.

This development has not considered the impacts on Green Infrastructure and is in direct conflict with the above objectives.

Additional Information is required in relation to this:

12.4.2 GREEN INFRASTRUCTURE AND DEVELOPMENT MANAGEMENT

All planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission, having regard to the following:

- i. In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone;
- ii. Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands);
- iii. The characteristics and assets of the proximate GI Core, Corridor or SteppingStone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;
- iv. Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;
- v. Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;
- vi. Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.
- vii. All development proposals shall be accompanied by a Green Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:
- viii. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;

- ix. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
- x. Indicate how the development proposals link to and enhance the wider GI Network of the County;
- xi. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site; à Proposals for identification and control of invasive species.

ADDITIONAL INFORMATION

3. Green Space Factor (GSF)

The applicant has not submitted any information in relation to the Green Space Factor.

The quantity and quality of green infrastructure provided by new development will be improved by the implementation of a Green Space Factor (GSF) for South Dublin. The GSF is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area. This measurement comprises a ratio that compares the amount of green space to the amount of impermeable 'grey' space in a subject site. As a planning tool, this ratio is used to assess both the existing green cover within a site and the impact of new development, based on the quantity and quality of new green space provided. Greening factors have been adopted and implemented across the UK, Europe and the United States to help ensure that new development makes a positive contribution to the local environment. By ensuring that new development meets minimum standards for the provision of GI the GSF aims to secure a positive contribution to biodiversity, amenity, air quality, stormwater management, temperature regulation and other ecosystem services. The GSF prioritises the retention of existing GI features within a subject site, in order to support the protection of the County's existing GI network. At the same time, the GSF will ensure that new development incorporates new landscaping and GI features, contributing to the enhancement of the overall GI network. Chapter 12, section 12.4.2 provides further detail on the requirements for the GSF as part of planning applications.

- **GI5 Objective 4:** To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).

ADDITIONAL INFORMATION

4. Sustainable Drainage Systems

SuDS have four pillars: attenuation, water quality treatment, amenity *and* biodiversity. The proposals are lacking in source control such as further bioretention, SuDS street trees, swales etc., that can be used for multifunctional benefit including attenuation. There are only three SuDS tree pits and one small bioretention area. Street trees should be provided and they should all have bioretention SuDS tree pits that attenuate water. The proposed attenuation basin and primary swale requires the removal of existing townland boundary hedgerow and trees earmarked for retention in Newcastle LAP (Peamount Neighbourhood). These are important routes for foraging and commuting bats. The

existing ditch identified in the ecological report should be investigated for use in sustainable drainage measures, as required by the Newcastle Local Area Plan.

An attenuation tank is proposed. SDCC do not approve of using underground tanks as part of SuDS schemes where the full natural potential of the site to manage surface water runoff has not been explored. The following additional information is requested:

- i. A SuDS proposal that complies with *SDCC SuDS Explanatory Design an Evaluation Guide, the Newcastle LAP and SDCC County Development Plan 2022-2028*.
- ii. The SuDS proposals should be a collaboration between landscape architect and the drainage engineer to integrate the SuDS into the landscape design proposals providing amenity, biodiversity, water quality treatment as well as quality and attenuation.
- iii. Plans showing existing and proposed flows.
- iv. Investigate the use of existing natural swales, ditches and hedges to be retained as part of the overall SuDS network to comply with objective GI15 of the County Development Plan:

Objective GI 15 *That existing natural swales, ditches and hedges shall be retained to form an integral part of the overall SuDS network.*

- v. Details on how each SuDS component function as part of the overall treatment train.
- vi. Demonstrate the biodiversity, amenity, water quality and attenuation value of all SuDS features including proposals for integrating the existing ditch to the northwest.
- vii. Swales should be used for attenuation not just for conveyance of overland flow. They should also have an amenity and biodiversity value.
- viii. 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.
- ix. Additional natural SuDS features shall be incorporated into the proposed drainage system for the development such as SuDS Street Tree Pits, further swales, rain gardens, detention basins, filter drains, etc.
- x. Demonstrate how the proposed natural SuDS features will be incorporated and work within the drainage and landscape design for the proposed development.
- xi. Provide details of the SuDS components that show how they work.

The applicant is recommended to contact the Public Realm and Water and Drainage Department to discuss.

ADDITIONAL INFORMATION

5. Landscape Proposals

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 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 proposals shall include:

- i. Full works specification, that accords with the specifications and requirements of the Council's Public Realm Section.
- ii. Hard and soft landscape details including levels, sections and elevations, detailed design of SUDs features including swales and integrated tree pits.
- iii. Play area(s) designed around the principles of natural and nature-based solutions, to provide informal, impromptu and spontaneous play opportunities combined with play equipment that provides appropriate challenges for multiple age groups.
- iv. Details of boundary treatments
- v. Planting and hardscape details for public open space to be detailed and agreed
- vi. Street Trees shall be planted in public open space with suitable tree pits that incorporates SuDS features.
- vii. Details of tree planting pits to include SUDS features in urban trees pits and use of urban tree soils
- viii. On-street car parking shall be combined with regular tree planting and a high standard of kerbing and paving compliant with DMURS (2019). Street trees to be provided every 2 parallel or 5 perpendicular car park spaces to reduce the hard urban impact of the proposed development; as traffic calming; for biodiversity; green infrastructure; air quality and sustainable water management.
- ix. Detailed design of all other SUDs features such as swales, permeable paving, green roofs etc.
- x. Details of Public Lighting and other underground services shall also be included on the landscape drawing to ensure that proposals are realistic, and planting is not precluded by the location of underground services and lighting and to ensure there is no conflict dark corridors for commuting bats.
- xi. A revised open space layout which includes proposals for informal kickabout.

- xii. A plan which clearly delineates public, communal and private spaces to be provided, as well as a detailed breakdown of the total area of same.
- xiii. Pedestrian connections to adjoining lands should be clearly indicated on plans. The applicant should show how public open spaces in the wider area will link in and integrate with the proposed development. The public realm should be integrated into the adjacent development areas, creating continuous green infrastructure connections that form both physical and biodiversity links. Access off main street is to be pedestrian/cycle and this area to be designed to create significant threshold area that could be considered as Public Open Space.

REASON: In the interest of Amenity, compliance with Development Plan Policy, the provision, establishment and maintenance of a reasonable standard of landscape and proper planning and sustainable development of the area.

ADDITIONAL INFORMATION

6. Play Provision

There are no play proposals: The applicant is requested to provide the following information with respect to play:

- i. Clarification shall be provided as to the total number and location of play opportunities; the age range they are appropriate for and whether they are universally accessible. An emphasis shall be on active, accessible play throughout the development.
- ii. Fully detailed play proposals including universally accessible equipment. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design.
- iii. The applicant shall consider the use of engineered woodchip as playground surfacing material.

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.

Details of play equipment, street furniture including public lighting and boundary treatments should be submitted and agreed with the Public Realm Section.

7. Invasive Species:

Given the presence of Giant Hogweed within the proposed development site, the applicant is required to provide the following:

- i. A detailed survey must be undertaken by an approved environmental consultant for the presence of Giant Hogweed and thus must be submitted for the approval of the Planning Authority.
- ii. An Invasive Species Management Plan as to how the Giant Hogweed will be addressed. This will be provided by suitably qualified specialist who can demonstrate experience and technical abilities in invasive species management and control.

ADDITIONAL INFORMATION

Summary

The Public Realm Section has objections in principle to the proposed development on the basis of the significant detrimental impact on trees, hedgerows and biodiversity, the lack of a green infrastructure strategy and lack of integrated SuDS design. The proposed development would materially contravene policies and objectives for green infrastructure, biodiversity, sustainable drainage, public open space and play in the County Development Plan and Newcastle Area Plan.

The Public Realm Section is requesting that the applicant significantly alter the layout of the proposed development providing:

- i. a much higher percentage of the existing trees and hedgerows on site are retained and protected, particularly along the townland boundaries;
- ii. a green infrastructure strategy
- iii. greening factor
- iv. a sustainable drainage system that complies with SDCC SUDs Explanatory Design and Evaluation Guide. makes use of existing hedges and ditches, provides multifunctional benefit, is well integrated into the landscape
- v. useable public open space including play opportunities and links to the adjoining areas.

Fionnuala Collins

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Laurence Colleran

Senior Executive Parks Superintendent