

## SOUTH DUBLIN COUNTY COUNCIL



### INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm

Date: 07/10/2021

**Caitlin O Shea**  
**Planning Officer**  
**Planning Department**

**Development:** Mixed development consisting of 1 public house and 26 apartments. The overall development will comprise the following; demolition of the existing single storey public house (area 910sqm), construction of a 4-storey apartment block within the footprint of the site (1267sqm) comprising of 26 apartments (4 one bedroom units, 22 two bedroom units) and smaller public house at ground level (area 156sqm and total area 2717sqm), all apartments have balconies/terraces. Car park for 12 cars (including 1 disabled space), bin stores and bicycle stands at ground level. Communal areas include 1st floor courtyard above carpark and 3rd floor roof terraces for apartments. Streetscape proposals within site boundaries to facilitate and enhance the public realm

**Location:** The Finches Public House, Finches Shopping Centre, Neilstown Road, Dublin, D22 H7X9

**Applicant:** Old Nangor Road Ltd.

**Reg. Ref:** SD22A/0346

**Recommendation:      ADDITIONAL INFORMATION**

**Site Area:**      0.1267 ha

**Zoning:**      Objective LC - To protect, improve and provide for the future development of Local Centres.

**Main concerns:**

**1. Adequate provision of high quality accessible Public Open Space**

The applicant has not provided the minimum 10% useable public open space required for new residential development by the SDCC County Development Plan (2022-2028).

**2. Green Space 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.

**3. Does not comply with SDCC GI Strategy**

*A GI Strategy has not been provided showing GI on site and the local context.*

**4. Does not comply with SDCC SuDS Guidelines** The proposed drainage system drainage system does not deliver multifunctional benefit as required by SuDS, i.e. amenity, biodiversity, water treatment and attenuation.

**5. Play** – There is no public open space play provision. SDCC CDP (2022-2028) requires 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.

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

**CHAPTER 3 NATURAL, CULTURAL AND BUILT HERITAGE**

**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.*

**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.*

#### **CHAPTER 4 GREEN INFRASTRUCTURE**

**POLICY GI1** *Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change*

**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 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 GI2: BIODIVERSITY** *Strengthen the existing Green Infrastructure (GI) network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council’s commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the Eastern and Midlands Region Spatial and Economic Strategy (RSES).*

**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 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 10:** *To enhance biodiversity and the health of pollinator species by banning the use of glyphosate 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.*

**POLICY GI5: CLIMATE RESILIENCE** *Strengthen the County's GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.*

**GI5 Objective 1:** *To protect and enhance the rich biodiversity and ecosystems in accordance with the ecosystem services approach to development enabling mitigation of climate change impacts, by absorbing excess flood water, providing a buffer against extreme weather events, absorbing carbon emissions and filtering pollution.*

**GI5 Objective 3:** *To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.*

- *Increase the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.*
- *Identify suitable sites for new urban trees including Miyawaki style mini woodlands, where feasible.*
- *To recognise the value of mature trees in terms of carbon sequestration and amenity over saplings.*

**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).*

**GI5 Objective 5:** *To promote positive land and soil protection measures to avoid degradation or loss of natural soil resources, to minimise sealing of soils and to remediate contaminated land.*

**GI5 Objective 6:** *To provide more tree cover across the county, in particular to areas that are lacking trees, with an emphasis on planting native Irish trees as appropriate*

**GI5 Objective 7:** *To require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDS strategy development.*

## **CHAPTER 8 COMMUNITY INFRASTRUCTURE AND OPEN SPACE**

**COS5 Objective 5:** *To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2. The Council has the discretion to accept a financial contribution in lieu of any remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, such contribution being held solely for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion to accept a financial contribution in lieu of the remaining open space requirement to allow provision or upgrade of Regional Parks, subject to the Regional Park meeting the open space 'accessibility from homes' standard specified in Table 8.1. Where the Council accepts financial contributions in lieu of open space, the total contribution shall be calculated on the basis of the costs set out in the applicable Development Contribution Scheme, in addition to the development costs of the open space.*

**COS5 Objective 6:** *To require that public open space calculations be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.*

**COS5 Objective 7:** *To require at the sole discretion of the Planning Authority a pro rata contribution in lieu of provision of public open space where, due to the small size, configuration or location of a particular development or on sites with less than three units it is not possible to provide functional public open space on site*

**Table 8.2:** Public Open Space Standards

<b>Land Use</b>	<b>Public Open Space Standards (minimum)</b>
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

**COS5 Objective 17:** *To ensure that incidental areas of open space which do not function as useable open space and / or are not clearly visible from the public realm, are designed out of a proposed scheme.*

#### **PLAY FACILITIES**

**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.*

#### **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 that the Planning Authority seeks the following additional information:**

### **1. 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 \(sdcc.ie\)](https://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 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.*

**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**

### **2. 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

### 3. Sustainable Drainage Systems

A sedum green roof, petrol interceptor and underground attenuation tank have been proposed. There has been no attempt to integrate an overland flow SuDS treatment train into the landscape proposals, for example irrigating planters. The proposals are lacking in source control such as disconnected downpipes, further bioretention, rain gardens, SuDS tree pits, channel rills, permeable paving. The sedum roof has limited biodiversity value and a blue-green roof or extensive green roof may be required to achieve the Green Space Factor. 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 using above ground features has not been explored. The following additional information is requested:

A SuDS proposal that complies with *SDCC SUDS Explanatory Design and Evaluation Guide, the Newcastle LAP and SDCC County Development Plan 2022-2028*.

- i. 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.
- ii. Plans showing existing and proposed flows.
- iii. Additional source control such as disconnected downpipes, further bioretention, rain gardens, SuDS bioretention tree pits, channel rills, permeable paving.
- iv. Details on how each SuDS component function as part of the overall treatment train.
- v. Demonstrate the biodiversity, amenity, water quality and attenuation value of all SuDS
- vi. 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.

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

## ADDITIONAL INFORMATION

### 4. 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 detailed landscape design for the proposed development incorporating SuDS features. The applicant shall provide a fully detailed

landscape plan with full works specification including street level proposals, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape proposals shall include:

- i. 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
- ii. Indicate how the development proposals link to and enhance the wider GI Network of the County;
- iii. hard and soft landscape details; including levels, sections and elevations,
- iv. detailed design of further SUDs features including disconnected downpipes, rain gardens, channel rills, permeable paving and bioretention trees pits. A blue/green or extensive green roof may be required to achieve the Green Space Factor.

The landscape proposals to be prepared by a suitably qualified landscape architect.

**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**

#### **5. Public Open Space**

The applicant has not provided the minimum 10% useable public open space required for new residential development by the SDCC County Development Plan (2022-2028). The applicant is requested to agree a financial contribution in lieu of the lack of open space and play provision, for example to be used for upgrade works to a local park.

#### **ADDITIONAL INFORMATION**

**REASON:** To uphold the policies of the South Dublin County Council Development Plan 2022-2028 relating to Children's play, and to provide for the proper planning and sustainable development of the area.

#### **Summary**

The Public Realm Section requires additional information in relation to Green Infrastructure, Green Space Factor, SuDS and Public Open Space to ascertain whether the landscape proposals are in accordance with the County Development Plan and best practice guidelines.

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**Fionnuala Collins**

**Assistant Parks Superintendent**

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**Endorsed By: Laurence Colleran**

**Senior Executive Parks Superintendent**