

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Planning Officer: CONOR DOYLE

Development: Demolition of an existing two storey detached dwelling (162sq.m) and associated out-buildings on site and the construction of 7 two storey (plus dormer level); 5 bedroom houses comprised of 3 detached houses and 4 semi-detached houses on a site area of c. 0.3ha; all associated site development works, car parking, open spaces and landscaping etc; proposed access to the development will be via the existing vehicular entrance on the Lucan-Newlands Road / Esker Hill.

Location: Clonbrone, Lucan Newlands Road, Lucan, Co Dublin, K78 Y5C2

Applicant: Nacul Developments Ltd.

Reg. Ref: **SD22A/0390**

Report Date: **25th November 2022**

Recommendation: **REFUSAL**

Site Area: 0.03 ha

Zoning: To protect and/or improve residential amenity

The Public Realm section has reviewed the application and recommend refusal due to concerns with the landscape scheme for the proposed development. We consider that:

1. Impact on existing trees, hedgerows and biodiversity

Most of the existing trees including all of the hedges (2No) and a category B Beech tree on the development site are proposed for removal to facilitate the development. There is limited effort to integrate the existing trees into the development. The proposed planting is insufficient to mitigate this loss. There are no street trees.

2. Does not comply with SDCC Green Infrastructure Strategy

Green Infrastructure has not been properly addressed. There is no Green Infrastructure Plan. The site lies within a Primary Green Infrastructure Corridor (No. 4 Liffey Valley River Corridor) and on the edge of a Core Area, as defined the SDCC County Development Plan 2022-2028. A GI Strategy has not been provided showing GI on site and the local context.

3. Green Space Factor not correctly applied

The Green Space factor has not been applied correctly. For example, the arborists report shows one tree being protected whose canopy lies partly within the site, yet a proposed surface area of 695m² is shown for preserved trees. We believe if applied correctly the Green Space Factor would fail.

4. Does not comply with SDCC SuDS Guidelines and Sustainable Water Management Policy

The proposed system is not SuDS compliant. The proposals are dominated by hard surfaces. There are limited proposals to use the landscape to manage surface water run-off. The amenity and biodiversity value in the proposed drainage scheme has not been demonstrated. SDCC do not approve of underground tanks where the full potential of nature-based solutions to manage surface water run off has not been investigated.

5. Insufficient public open space

The triangular grassed area at the entrance to the development is incidental space and cannot be included in the public open space calculation.

Opportunities to connect the open space into the adjoining open space and the wider area such as a connection to the existing path onto the Lucan/Newlands Road have not been investigated or presented.

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

CHAPTER 4 GREEN INFRASTRUCTURE

Policy G1 Overarching

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 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.

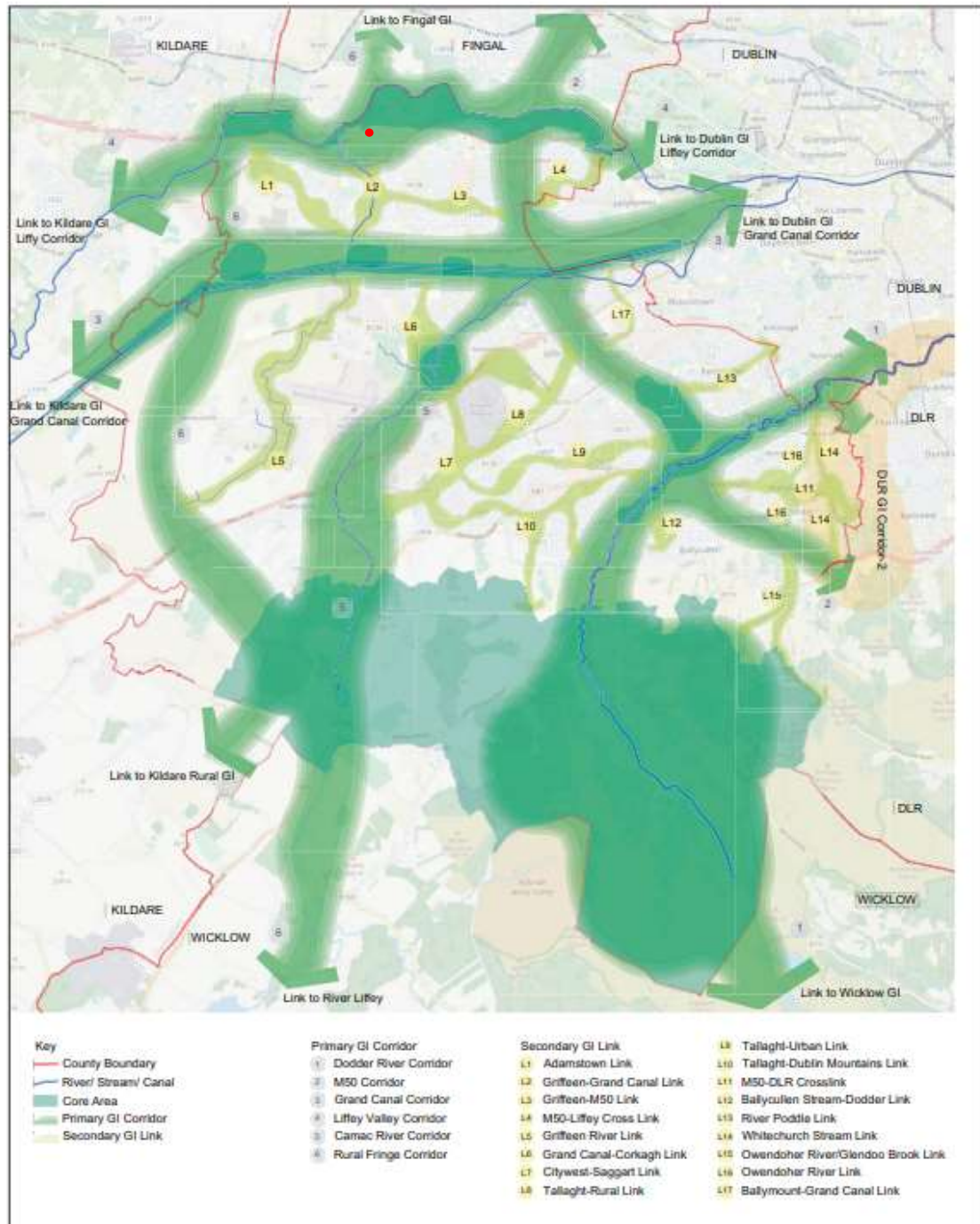


Figure 4.4: Green Infrastructure Strategy Map

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.*

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.*

Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas

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 Tree Protection

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.

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.*

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 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.*

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).*

Policy GI5: Climate Resilience

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

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

GI6 Objective 3: *To provide accessible, attractive and safe routes linking settlements to the GI network of the County.*

GI6 Objective 4: *To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8: Community and Open Space of this Development Plan and South Dublin County's Parks and Open Space Strategy.*

GI6 Objective 6: To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.

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.

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