SOUTH DUBLIN COUNTY COUNCIL

INTERNAL MEMORANDUM

Department: **Parks & Landscape Services / Public Realm** Date: **13/12/2022**

Sarah Watson

Planning Officer

Planning Department

Development: Development on 2 sites separated by the permitted Celbridge Link Road with a total area of 6.36 Ha; The south-western site (5.39 Ha) is generally bound to the east by Celbridge Link Road, to the south and west by undeveloped land and an electrical substation and to the north by the Tubber Lane Development Area. The north-eastern site (0.97 Ha) is generally bound to the east by the undeveloped Primary School site and Aderrig Park Avenue, to the south by Airlie Park Road West and the undeveloped Primary School site, to the west by Celbridge Link Road and the Tubber Lane Development Area and to the north by the Tubermaclugg Village Development Area.

This application is being made in accordance with the Adamstown Planning Scheme 2014 (as amended) and relates to a proposed development within the Aderrig Development Area of the Adamstown Strategic Development Zone; The proposed development will principally consist of: the demolition and removal of derelict hardstanding and walls; and the construction of 207 residential units (64 two bed, 127 three bed and 16 four bed), ranging in height from 2 storeys to 4 storeys, comprising 75 houses (59 three bed and

16 four bed) and 132 duplexes (64 town bed and 68 three bed); The development will also include: vehicular junctions to access the development from Celbridge Link Road (2 No.) and Adamstown Way (3No.); internal road, cycle and footpath network; 314 car parking spaces; cycle parking; bin storage areas; public, communal and private open space areas, with balconies and terraces facing all aspects; hard and soft landscaped areas; boundary treatments; public lighting; 2 sub-stations; and all associated site and development works above and below ground.

Location:	In the townland of Aderrig, Adamstown, Lucan, Co. Dublin
Applicant:	Quintain Developments Ireland Limited
Reg. Ref:	SDZ22A/0014
Zoning:	Adamstown Strategic Development Zone, Development Area 8 : Aderrig
Site Area:	6.36ha
Recommendation:	**Additional Information**

MAIN CONCERNS

1. **Insufficient Street Trees**

There are several sections of roads without street trees. The applicant was advised in detail at preplanning stage that this was an issue. Trees that are integral to the street need to be in public ownership and comply with the requirements of Adamstown SDZ (2014), Adamstown Street Design Guide (2014) and DMURS (2019). On the Celbridge link road Trees should be provided after every two parallel spaces rather than every 3 spaces as proposed.

2. **Green Infrastructure Provision**

The Green Infrastructure Plan does not show connection to the wider Green infrastructure. The context of the western boundary hedgerow needs to be shown so its importance can be understood. Applications on neighbouring sites have indicated the presence of three badger setts in the vicinity therefore habitat connectivity should be demonstrated. The Green infrastructure links in the adjoining site don't seem to have been picked up and continued through the site. There is already a road through the western boundary hedgerow. Proposals are required that recreate that connection with planting.

3. **Impact on trees, hedgerows and biodiversity**

a) Bats (maintain, enhance, create foraging routes - dark zones) Threats to bats, protected species under the Wildlife Act 1976 and Wildlife Amendment Act 2000 and the Bern (1982)

and Bonn (1979) conventions, identified in the Ecological Impact Assessment Report (ECIAR) (BSM, Oct 2022) and (Faith Wilson, 15th December 2021) include light pollution (inappropriate lighting) and loss of foraging areas – removal of hedges and scrub.

b) Badgers (protect setts; maintain, enhance, create habitat connectivity). The badger is an internationally protected species under the Wildlife Act 1976 (Amended 2000) and the Bern (1982) convention. A badger sett was identified the northern part of the western boundary hedgerow (BSM EclAR Oct 2022) and Faith Wilson EcIAR, Dec 21 for the adjoining development at Tobermaclugg (SDZ21A/0023).; and there are known badger setts in the wider area. The badger survey recommended in the BSM EIAR should be undertaken now rather than prior to commencement of construction and measures proposed to ensure connectivity for badgers and protection from people and dogs.

c) Public lighting is shown next to hedgerows (Sabre Electrical Services, Aderrig Phase 3 Public Lighting Layout Dwg No SES 14322) including the area designated for badger protection. The Western Boundary Hedgerow should be retained as a dark corridor and should not be lit. This is a recommendation of the BSM Ecological Impact Assessment (EcIA) Report Oct 2022 (P18 Section 5.3.2) Public lighting must be kept on the opposite side of roads to retained hedgerows. Lighting should be placed to light streets rather than along green corridors.

4. **Insufficient SUDS**

There is no permeable paving, a standard component of a SuDS treatment train. The additional street trees required to comply with the planning scheme should all have SuDS bioretention tree pits.

Relevant Sections, Policies and Objectives of the Adamstown Strategic Development Zone (SDZ) Planning Scheme, Adamstown Street Design Guide (2010), DMURS (2019) and SDCC Development Plan 2022-2028:

Adamstown SDZ (2014)

2.3 (vii) Road/Street Width

Regard should also be had to ADSG, and in particular the Street Typologies and Accepted Standards contained within Part B of the document.'

2.4 (vii) Car Parking

2.4.21 It is an objective that Adamstown is designed to accommodate but not be dominated by the car. Car-parking provision shall be carefully integrated in terms of layout, surface treatment and screen planting. Shared on street and communal car parking shall be optimised.

2.4.22 Properly marked car parking spaces shall be provided on all roads and streets throughout Adamstown, with the exception of main access and busway distributor roads, certain sections of residential distributor roads, and in close proximity to junctions. In addition, no more than 60% of residential car parking spaces shall be provided as private in-curtilage parking spaces in any development area.

2.4.23 *Where on-street car parking is provided in a road corridor outside but adjoining a net development area, it may contribute towards residential and/or non-residential car parking requirements in the net development area.*

2.4.24 *On-street car parking shall be combined with regular tree planting and a high standard of kerbing and paving. It is a general objective that not more than five perpendicular or two parallel car parking spaces be allowed between trees*.

2.5 (v) Environmental Sustainability and Sustainable Design
'2.5.23 Promoting and supporting improvements in the public realm which … support Sustainable Urban Drainage Systems (SUDS), increase carbon sequestering…'

2.6 (ii) Green Infrastructure
'2.6.7 Public open spaces shall be linked by a network of 'green' routes that retain and enhance existing landscape and ecological features such as trees, hedgerows and watercourses and incorporate new elements such as street planting and sustainable urban drainage systems.'

ADAMSTOWN STREET DESIGN GUIDE 2014 Part A (See also Part B Section 6 Street Typologies and accepted standards for side streets (6.3) and back streets (6.4).

3.11 Street Trees
'3.11.3 *Street trees should be provided at regular intervals along Side Streets and Back Streets. The placement of trees will be dependent on on-street parking. Placement should be maximised by opportunistic placements in areas such as between sections of parking bays and within verges*.'

DMURS (2019)

'4.2.2 Street Trees
Street trees are an integral part of street design as they contribute to the sense of enclosure, act as a buffer to traffic noise/pollution and enhance place. A traffic calming effect can also be achieved,

where trees are planted in continuous rows and their canopies overhang, at least in part, the vehicular carriageway. Street trees can also be used to enhance legibility by highlighting the importance of connecting routes and distinguishing one area from another through variations in size and species selection. The planting of trees should be considered as an integral part of street design''

'4.2.7 Planting

In Neighbourhoods and Suburbs a greater emphasis may be placed on the use of planted materials to promote 'softer' landscape elements to promote a greener 'living' character. Streets also support an important drainage function within built-up areas. The shift toward sustainable forms of development has seen the emergence of Sustainable Urban Drainage (SUDs) systems. SUDs consist of a range of measures that emulate a natural drainage process to reduce the concentration of pollutants and reduce the rate and volume of urban run-off into natural water systems (and thus the pollutants it carries). The incorporation of SUDs elements into the fabric of the street itself can also serve to increase legibility and add value to place (see Figure 4.29). Further advice with regard to the use of SUDs may be found in the Greater Dublin Strategic Drainage Study (2005).

RELEVANT SECTIONS OF SDCC COUNTY 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 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.

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 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 GI3: Sustainable Water Management

GI3 Objective 1: To ensure that hydromorphological assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan.

GI3 Objective 2: To require development proposals that are within riparian corridors to demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology.

GI3 Objective 3: To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any development site.

GI3 Objective 4: To uncover existing culverts where appropriate and in accordance with relevant river catchment proposals to restore the watercourse to acceptable ecological standards for biodiversity wherever possible improving habitat connection and strengthening the County's GI network.

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

GI5 Objective 2: To protect and enhance the natural regime of the watercourses of the County to more efficiently capture their flood resilience value.

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 12 IMPLEMENTATION AND MONITORING

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 Stepping-Stone 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:

   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. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;

   iii. Indicate how the development proposals link to and enhance the wider GI Network of the County;

   iv. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.

Green Space Factor (GSF)

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.

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.

12.4.3 RIPARIAN CORRIDORS:

The riparian corridors of the County include rivers, streams and other watercourses and are important for water quality as well as providing green infrastructure and biodiversity links, see sections 4.2.2 and 11.3.1 for policy and objectives. Development within or affecting riparian corridors will be required to:

Uncover existing culverts where appropriate and in accordance with relevant river catchment proposals, restore the watercourse to acceptable ecological standards for biodiversity wherever possible, improving habitat connection and strengthening the County's GI network.

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 conductive 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 recommends the following significant additional information is sought:

1. Street Trees

A redesign of the streets is required to provide street trees on both sides throughout the development. Trees that are integral to the street need to be in public ownership and comply with the requirements of Adamstown SDZ (2014), Adamstown Street Design Guide (2014) and DMURS (2019):

i. Street trees to be provided on all streets in the public realm, integral to the street, outside the footpath on both sides. Street tree provision is deficient along the following streets:

- Road 1 East side
- Road 2 Northside
- Road 3 North side
- Road 4 South side
- Road 5 East Side (retained vegetation to West is noted)
- Road 6 (one)
- Road 8 East side (retained vegetation to West is noted)

- Road 9 North side
- Homezone 2 Eastside
- Pedestrian link (Links Road 3 to Cellbridge Link Road)

ii. *'Not more than five perpendicular or two parallel car parking spaces… between trees*.' (2.4.24 Adamstown SDZ 2014)

iii. Include details of SuDs tree trench with engineered soil to run continuously along the Celbridge Link Road.

iv. Remove geotextile layers from compacted stone layers within the SuDS tree pit due to their tendency to clog and cause water logging of the tree pit. Geotextile can be wrapped around services/collector drains.

v. Confirm that the proposed tree species proposed along the Celbridge Link Road match those previously agreed for SDZ17A/0009.

vi. Street trees to be a minimum 18-20cm girth at planting and to be predominantly native and/or pollinator friendly species.

2. **Green Infrastructure Provision**

a) Additional information is required to demonstrate how the plans 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.

b) 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:

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. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
iii. Indicate how the development proposals link to and enhance the wider GI Network of the County; Proposals are required that recreate the green infrastructure connection severed by the road through the western boundary hedgerow.
iv. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.
v. Demonstrate habitat connectivity for badgers
vi. Continue GI links from adjoining site.
vii. Planting proposals that recreate the severed GI connection caused by the roadway through the western hedgerow.

c)

Refer to Chapter 4 of SDCC County Development Plan (2022-2028): Chapter 4 Green Infrastructure and Chapter 12 Implementation and Monitoring.

ADDITIONAL NFORMATION

REASON: To reduce fragmentation, protect and enhance the biodiversity and ecological value of South Dublin County's Green Infrastructure network

3. <u>Ecological Mitigation measures:</u>

a) <u>Bats.</u>

An Ecological Impact Assessment (Faith Wilson, 15th December 2021 - page 20) identified potential bat roosts on the northern boundary of the proposed site for which protective measures are required. Revised proposals are required that integrate the recommendations of the ecologist and bat expert into the design proposals.

b) <u>Badgers</u>

The badger is an internationally protected species under the Wildlife Act 1976 (Amended 2000) and the Bern (1982) convention. A badger sett was identified the northern part of the western boundary hedgerow (BSM Ecological Impact Assessment Report Oct 2022). The EcIA (Faith Wilson, 15th December 2021) also identified this sett and proposed remedial measures in the form of an ecological corridor and badger protective fencing. The report also identified other badger setts within the wider area (Fig 12 Page 26) and stated that habitat connectivity between these setts must be protected and enhanced. The applicant is requested to undertake a badger survey; review badger protection measures in the context of adjoining approved development and provide an approach to badger protection both during construction and in the long term to ensure habitat connectivity and protection from people and dogs.

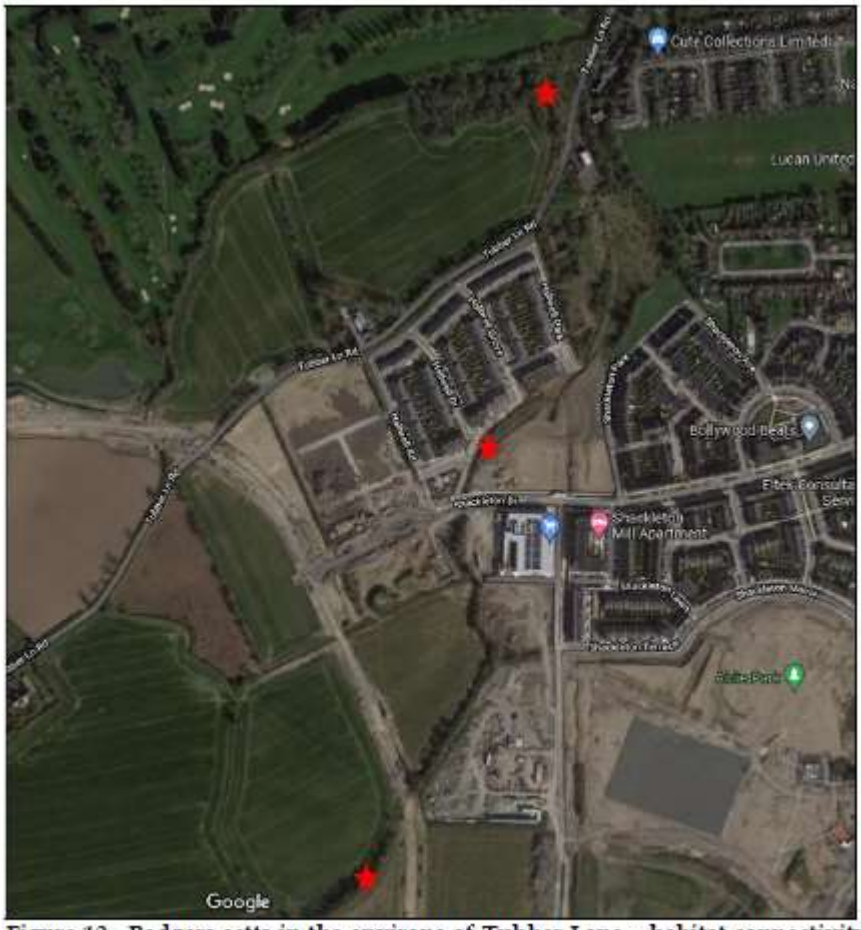

Figure 12. Badgers setts in the environs of Tubber Lane – habitat connectivity between these setts must be protected and enhanced.

ADDITIONAL INFORMATION

c) Public Lighting

Revised proposals that incorporate the recommendations regarding reduction of light disturbance. There shall be no light spill from the proposed development into the retained areas of linear vegetation. Public lighting proposals to be clearing shown on the landscape plans to also ensure Street tree proposals can be implemented.

ADDITIONAL INFORMATION

4. Additional SuDS

The applicant is requested to provide additional SuDS proposals that include permeable paving and further bioretention tree pits within the requested additional street trees required to comply with the planning scheme.

ADDITIONAL INFORMATION

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Fionnuala Collins

Assistant Parks Superintendent

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Endorsed By: Laurence Colleran

Senior Executive Parks Superintendent