

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM PUBLIC REALM PLANNING REPORT

Development: Social housing development consisting of 10 one bed units in a two to three storey apartment building, associated car parking and bicycle parking, bin store, water pump house, new vehicular access onto Old Nangor Road, new pedestrian access onto Old Nangor Road, landscaping, boundary treatments, public lighting and all associated site and engineering works necessary.

Location: Lands at, Old Nangor Road, Clondalkin, Dublin 22

Applicant: Dublin Simon Community

Reg. Ref: SD22A/0412

Report Date: 13/12/2022

Planning Officer:

Recommendation: REQUEST ADDITIONAL INFORMATION

Statutory Local Policy

South Dublin County Development Plan, 2022-2028

Section 3.3.6 Protection of Trees and Hedgerows

Policy NCBH11

Section 3.4.3 Landscapes

Policy NCBH14

Section 4.0.1 GI and Climate Action

Policy GI1: Overarching

Section 4.2.1. Biodiversity

Policy GI2: Biodiversity

Section 4.2.2. Sustainable Water Management

Policy GI3: Sustainable Water Management

Policy GI4: Sustainable Drainage Systems

POLICY GI5: Climate Resilience

SECTION 4.2.4 Recreation and Amenity (Human Health and Wellbeing)

Policy GI6

Section 4.2.5 Landscape, Natural, Cultural and Built Heritage

Policy GI7

Section 8.7.1 Principles guiding public open space provision

Policy COS5: Parks and Public Open Space – Overarching

Section 8.7.4 Delivery of Public Open Space and Contributions in Lieu

Section 8.7.5 Quality of Public Open Space

Section 8.7.6 Play Facilities

Section 12.4.3 Riparian Corridors

COMMENTS:

In relation to the above proposed development, this section has reviewed the application and has the following comments.

Landscape Plan

The applicant has not provided a detailed landscape plan or landscape design statement/rationale for the proposed development. The applicant therefore requested to provide a landscape plan with full works specification and a landscape design statement that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations. The landscape proposals to be prepared by a suitably qualified landscape architect.

Open Space Provision

It is still not clear from the information submitted if the proposed development meets the relevant open space requirements under the CPD 2022-2028. The applicant is requested to submit in table form the percentage (%) and area in sq.m the of the proposed private, semi-private and public open space provision within the site. The applicant should demonstrate compliance with the South Dublin County Development Plan 2022-2028 in relation to open space Sections 8.7 and 12.6.10. Public open space shall be provided at the rates specified in Table 12.22 below. The occupancy rate used for the purposes of public open space calculations is 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.

Table 12.22: Minimum Public Open Space Standards

Land Use	Public Open Space Standards (Minimum)
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

Public Open Space and Contributions in Lieu

As stated in Section 8.7.4 of the CDP 2022-2028. The Council's general intent is to ensure a minimum provision of public open space on site, within the relevant zoning, as set out under Table 8.2 Public Open Space Standards. The Council may, in certain circumstances and at its sole discretion, allow for an element of open space to be located off-site where it exceeds the minimum on-site requirements. Alternatively, the Council may in certain circumstances and at its sole discretion, determine a financial contribution in lieu of all, or part of, the public open space requirement for a particular development. These circumstances may include (but are not limited to) situations where public open space requirements cannot be met on site in full or partially because:

- the provision of open space would be so small that it would not be viable due to the size, shape, configuration or context of the site;
- an element of off-site provision would better facilitate the proposed development and allow for the improvement of existing open space or improvements to the GI Network located in the vicinity of the site.

Any contributions in lieu of public open space will be calculated in accordance with the South Dublin County Council Development Contribution Scheme prepared under Section 48, of the Planning and Development Act, 2000 (as amended). In addition, the following policy objectives also apply:

COS5 Objective 4: 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 for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type set out 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 for the remaining open space requirement to allow provision or upgrade of Regional Parks, to achieve the overall standard of 2.4 ha per 1,000 population, subject to the Regional Park meeting the open space 'accessibility from homes' standard set out in Table 8.1.

As per above; the Council has the discretion for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type set out in Table 8.1.

The applicant shall agree with the Planning Authority in consultation with the Public Realm Section the provision of additional facilities or upgrading of existing facilities within a POS or neighbouring Park outside of the proposed Development site in order to make up for the shortfall of POS provided for within the subject Development. If the provision or upgrade of additional facilities cannot be agreed, then the Council will accept a 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.

SUDS

There is a lack of SuDS (Sustainable Drainage Systems) shown for the proposed development. Natural SUDS features shall be incorporated into the proposed drainage system. The SUDS shall be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022.

GREEN INFRASTRUCTURE

As required under Section 12.4.2 of the CDP 20222028, 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:

- 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;

- 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);
- 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;
- 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;
- 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;
- 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.

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:

- 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;
- Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
- Indicate how the development proposals link to and enhance the wider GI Network of the County;
- 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.

GREEN SPACE FACTOR (GSF)

The GSF is a score-based requirement that establishes minimum standards for landscaping and GI provision in new developments. Minimum scoring requirements are based on the land-use zoning of a site (See GI5 Objective 4), this applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Qualifying developments are required to reach the minimum Green Space Factor (GSF) score established by their land use zoning. Developers can improve their score by both retaining and enhancing existing landscape features and incorporating new features. A developer will be required to specify the GSF measures included within a proposed development as part of the submitted Green Infrastructure Plan and Landscape Plan. A Green Space Factor Guidance Note will also be made available on the Council's website under the Development Plan section setting out the applicable weightings and scorings. Where applicable, a completed worksheet shall be submitted with the Green Infrastructure Plan and Landscape Plan in support of a proposed development.

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2022-2028 and with best practice guidelines and recommends the following ADDITIONAL INFORMATION be requested:

1. Landscape Design 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. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The applicant shall provide the following additional information:

- i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
- ii. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
- iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.

- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
- v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

2. Provision of Public Open Space

It is not clear from the information submitted if that applicant has achieved the required open space provision of 2.4 Ha per 1,000 population, which equates to 720 m² of POS required for the subject development. The applicant has only provided 489m² in terms of POS, therefore there is a shortfall of 231m². Therefore, as per **COS5 Objective 4 with the CDP 2022-2028** and if there is a shortfall in the open space provision required within the development then the applicant shall agree with the Planning Authority in consultation with the Public Realm Section the provision of additional facilities or upgrading of existing facilities within a POS or neighbouring Park outside of the proposed Development site area in order to make up for the shortfall of POS provided for within the subject site. If the provision or upgrade of additional facilities cannot be agreed, then the Council will accept a 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

3. Sustainable Drainage Systems

(A) The applicant should demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems.

(B) In relation to SUDs, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates and showing what SuDS (Sustainable Drainage Systems) are proposed.

(C) SUDs Management - The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing

surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.

(D) Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

(E) The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m³. Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m² are proposed such as, green roofs, permeable paving, buildings, roads and their respective run off coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

4. Green Infrastructure and Green Space Factor (GSF)

The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:

(a) To demonstrate how they intend to reduce fragmentation of existing green infrastructure. The applicant should provide a green infrastructure plan showing connections through the site and connections to wider GI network.

(b) To demonstrate how the appropriate Greening Factor will be achieved for the relevant land use zoning objective. See link to the Green Space Factor Worksheet: [Related Documents - SDCC](#)

5. Boundary Treatment

The applicant is requested to submit elevation drawings specifying the proposed boundary treatment to the front of the site.

Prepared By: Oisín Egan

Executive Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent