

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Planning Officer: CIARAN STANLEY

Development: Relocation of the existing Clondalkin RFC grounds at Gordon Park to new lands at Kingswood Farm, Moneenalion Commons Lower Clondalkin and comprising of 4 new rugby playing pitches, including a high quality main competition pitch (with modern directional floodlighting comprising 18m high floodlighting columns either side) and a high quality Junior pitch both laid approximately level, and two back pitches as well as various grassed rugby training areas all laid on existing land cross fall levels; change of use of existing agricultural shed to accommodate new two storey changing facility and storage areas; a new two storey Clubhouse Pavilion with supporting facilities including dressing rooms, physio rooms, coffee dock, committee rooms, members bar and lounge, plantroom and toilets; all associated site development sustainability and infrastructure work including connection to existing public foul sewer, SUDs, sedum roof and PV roof panels; new landscaping throughout the site comprising trees, hedges and wild flower areas; new cycle track and pedestrian access and stairs off the R136, bicycle shelter, children's playground area, electrical car charging stations, vehicle parking and new vehicle entrance off the Old Country Roadway.

Location: Kingswood Farm, Moneenalion Commons Lower, Clondalkin, Dublin 22

Applicant: Clondalkin Rugby Football Club Ltd.

Reg. Ref: **SD21A/0081**

Report Date: **23/09/ 2022**

Recommendation: **Clarification of ADDITIONAL INFORMATION**

Site Area: 9.6 ha

Zoning: To protect and improve rural amenity and to provide for the development of agriculture

Main Concerns:

- Significant impact on trees, hedgerows and biodiversity in the area including excessive fragmentation of the existing green infrastructure. The removal of hedgerows is considered excessive and damaging to the wider Green Infrastructure. The applicant is attempting to cram too much into the site and this can only be achieved by the removal of trees and hedgerows which are important Green Infrastructure links. The proposals are causing excessive fragmentation and mitigation measures are not sufficient.
- Potential impacts on bats – significant lighting proposed. Significant habitat loss (potential roosting/foraging/commuting bats)
- Likelihood that additional lighting may be required on access road which would further damage an important dark zone
- Impact on Camac River and Baldonnell Upper Stream. The minimum 10-meter vegetated strip required as a setback has not been provided. Given that these are important Green Infrastructure links this 10-meter minimum setback is not considered sufficient to strengthen the GI corridor and it should be further expanded

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

Chapter 7 INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE)

Policy 2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

IE2 Objective 3: To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.

IE2 Objective 9: To protect water bodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains, within the County from inappropriate

development. This will include protection buffers in riverine and wetland areas as appropriate (see also Policy G3 Objective 2 – Biodiversity Protection Zone).

Chapter 8 GREEN INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE)

Policy 2 Green Infrastructure Network

G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network

G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within the design proposals and supporting their integration into the Green Infrastructure Network.

G2 objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting etc. into existing areas of hard infrastructure wherever possible.

G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

Policy 3 Watercourses Network

It is the policy of the Council to promote the natural, historical and amenity value of the County's watercourses; to address the long term management and protection of these corridors and to strengthen links at a regional level.

G3 Objective 2: To maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy, 2015; the Greater Dublin Area Strategic Cycle Network; and other government plans or programmes will be open for consideration within the biodiversity protection zone, subject to appropriate

safeguards and assessments, as these routes increase the accessibility of the Green Infrastructure network.

Policy 4 Public Open Space Hierarchy and Landscape Setting

G4 Objective 2: To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

Chapter 9 HERITAGE CONSERVATION AND LANDSCAPES

Policy 15 Non-Designated Areas

HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

Living with Trees – Tree Management Policy 2015 – 2020

South Dublin County Council's Tree Management Policy 'Living with Trees' 2015-2020 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.
- 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 the following significant additional information be provided:

1. Arboricultural Impact

- i) The removal of hedgerows is considered excessive. Important hedgerows could be retained if the northwestern most training pitch (70 x 107m) was removed from the plans and the other pitches realigned. Additional Information required to show retention of hedgerows on site.

Reason: To ensure the protection of trees to be retained on site in the interests of amenity, ecology, climate adaptation, proper planning and sustainable development.

SIGNIFICANT ADDITIONAL INFORMATION

2. Landscape /Blue-Green Infrastructure

There are concerns with the lack of protection and enhancement of Green Infrastructure on the site. The applicant is requested to provide a fully detailed landscaping scheme for the proposed development.

- i) The applicant should provide a fully detailed landscape plan with full works specification and a fully detailed planting plan that accords with the specifications and requirements of the Council's Public Realm Section.
- ii) The landscape Plan shall include hard and soft landscaping including levels, sections/elevations and details, detailed design of SUDs features including swales, permeable paving, green roofs and integrated tree pits etc.
- iii) The applicant should propose a 10m vegetated strip along all watercourses and this should not include paths or other infrastructure. The northwestern training pitch comes right up to this 10 meter riparian zone. There is no space for a runoff and it is most likely that that zone would be heavily and negatively impacted by use of the pitch.
- iv) The applicant should show the retention of existing hedgerows except where necessary for site access , mitigation planting for any proposed tree and hedgerow removal; protection of trees and hedgerows to be retained; enhancement of existing hedgerows; additional infill planting; creation of new habitat; integration of SuDS features into the landscape; boundary planting. There should be a net gain of trees and hedgerow.
- v) Existing green infrastructure links should be maintained.

Reason: In the interests of amenity, ecology, climate action and sustainable development.

SIGNIFICANT ADDITIONAL INFORMATION

Summary

The Public Realm Section has concerns about the impact of the development on GI including 2 watercourses, existing trees and hedgerows and on habitats for bats.

The Public Realm Section is requesting that the applicant provide a clarification of additional information such that the development demonstrates the protection of watercourses, hedgerows and trees and compliance with the policies and objectives of the County Development Plan.

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