

## **SOUTH DUBLIN COUNTY COUNCIL**



### **INTERNAL MEMORANDUM PUBLIC REALM PLANNING REPORT**

**Development:** Alterations to previously approved development (Reg. Refs. 5D16A/0269 and 5D18A/O285) comprising; Retention permission for: (i) an increase in the number of residential apartment units from 37 to 42 units now consisting of 2 one-bedroom units, 34 two-bedroom units, and 6 three-bedroom units, and; (ii) all associated site and engineering works necessary to facilitate the development; Planning permission for: (i) the amalgamation of unit nos. 22 and 23 and the amalgamation of unit nos. 34 and 33; (ii) internal alterations to provide for an increased quantum of storage space; (iii) alterations to private amenity spaces to provide for extension of ground floor private courtyards and balconies, of unit nos. 6-11, 17-20, 22-25, 27-30, 32-35, and 37-40 and the addition of private amenity spaces to unit nos. 12-16, 21, 26, 31, 36, and 41-42; (iv) the provision of fire escape stairs from the third floor to the fourth floor; (v) revisions to the permitted site layout to now provide for 50 car parking spaces (inclusive of 3 disabled parking spaces and 5 electric vehicle charging spaces); (vi) the provision of 110 residential bicycle spaces (88 residential bicycle spaces and 22 visitor bicycle spaces); (vii) relocation of bin store from eastern boundary wall to northern boundary wall; (viii) landscaping, including communal public open space comprising 1 playground (583sq.m total), and all associated boundary treatments, and; (ix) all associated site and engineering works necessary to facilitate the development.

**Location:** Larkfield House, Coldcut Road, Liffey Valley, Dublin 22

**Applicant:** Cavvies Limited

**Reg. Ref:** **SD22A/0425**

**Report Date:** 09/11/2022  
**Planning Officer:** NEAL MURPHY  
**Recommendation:** REFUSAL  
**Land Use Zoning:** *Zoned OS with the Objective To preserve and provide for open space and recreational amenities*

**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**

**Main Concerns:**

- The proposals have not sufficiently demonstrated compliance with GI policies as set out in the CDP 2022-2028. GI Plans need to be developed to reduce fragmentation of existing GI and show connections through site and into wider GI Network.

- The proposals have not sufficiently demonstrated compliance with Public Open Space Provision requirements as set out in the CDP 2022-2028.
- Applicant has not demonstrated compliance in terms of the requirement to achieve the appropriate Green Space Factor for the development site. Appropriate Green Factor of 0.7 (as per *Table 1: Minimum Green Space Factor Scores for Land Use Zonings*) for the site must be achieved.
- Details of soft and hard landscaping including Sections/Elevations required.
- Lack of detail in terms of Play Provision proposed.
- There is a lack of SuDS (Sustainable Drainage Systems) shown for the proposed development. The current layout is not in compliance with relevant policies relating to SUDS as set out in the CDP 2022-2028.

**COMMENTS:**

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

**LANDSCAPE PLAN**

Additional details in terms of the landscape scheme submitted. The applicant is required to provide a landscape masterplan and landscape design statement/rationale including with full works specification, 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 current layout is not in compliance with relevant policies in terms of Landscaping set out in the CDP 2022-2028 including **GI1 Objective 4**.

**PLAY PROVISION**

Additional details, specifications and images are required in relation to the proposed playground/playspace. All play equipment should be of predominantly natural materials with unstructured play included in the proposed design. The playground designer/landscape architect can contact SDCC public realm section to discuss the proposed playground, including the inclusion of additional universally accessible equipment. The applicant should consider the use of engineered woodchip as playground surfacing material.

The applicant is requested to submit a detailed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using natural and nature-based solutions, to provide informal,

impromptu and spontaneous play opportunities, along with *play equipment* that provides appropriate challenges for multiple age groups. The Layout Plan shall comprise the following: -

- showing types of play and play area(s),
- target age groups,
- landform (included levels and contours) and boundaries,
- design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface.

All play equipment and ancillaries shall conform to European Standards EN 1176-1-11 and EN 1177 Playground equipment and surfacing, and to BS/EN standards 2017/18 for Playground Installations for HIC (Head Injury Criterion) and CFH (Critical Fall Height).

The current layout is not in compliance with relevant play policies set out in the CDP 2022-2028 including:

- **COS5 Objective 19**
- **COS5 Objective 20**

#### **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

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

The current layout is not in compliance with relevant policies relating to the provision of Public open Space as set out in the CDP 2022-2028 including:

- **COS5 Objective 1**
- **COS5 Objective 4**

### **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.

Development proposals should provide suitable drainage measures in compliance with the South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, 2022.

- The maximum permitted surface water outflow from any new development should not exceed the existing situation, and on greenfield lands, that of a greenfield site before any development took place;
- All new development must take account of the 'precautionary principle' in relation to climate change;

Development proposals should not give rise to the pollution of ground or surface waters either during construction phases or subsequent operation. This will be achieved through adherence to best practice in the design, installation and management of systems for the interception, collection and appropriate disposal or treatment of all surface water and effluents.

The current layout is not in compliance with relevant policies relating to SUDS as set out in the CDP 2022-2028 including:

- **GI4 Objective 1**
- **GI4 Objective 2**
- **GI4 Objective 3**
- **GI4 Objective 4**
- **GI4 Objective 5**

### **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.

The current layout is not in compliance with relevant policies relating to GI as set out in the CDP 2022-2028 including:

**COS5 Objective 8**

**COS5 Objective 9**

**COS5 Objective 10.**

**COS5 Objective 11**

**COS5 Objective 12**

**COS5 Objective 13.**

**COS5 Objective 14**

**COS5 Objective 16**

**COS5 Objective 17**

**COS5 Objective 18**

### **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 is 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 applicant has not complied with the requirement to implement the Green Space Factor (GSF) for the Development as set out in the CDP 2022-2028.

**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).

**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.**

**In the first instance it is recommended that this application be REFUSED based on the reasons outlined above, however if ADDITIONAL INFORMATION is sought then the following should be requested from the applicant:**

**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 including Landscape Design Statement/Rationale, Detailed Play Layout and GI Plan. 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.
- vii. A detailed play strategy including a Play Plan (separate to, but related to the Landscape Masterplan), the layout Plan shall comprise the following:
  - showing types of play and play area(s),
  - target age groups,
  - landform (included levels and contours) and boundaries,
  - gates and planting,
  - design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface.
  - a specification of all play equipment to be installed including provision for children with disabilities and special sensory needs;
  - a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas.
- viii. a specification of all play equipment to be installed including provision for children with disabilities and special sensory needs;
- ix. a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas.

## **2. Landscape Maintenance and Management**

The applicant is requested to provide details of the scheme for the maintenance and management of the proposed landscape scheme including the play area for the lifetime of the development. The scheme shall include the following:

- i) methods for the proposed maintenance regime;
- ii) detailed schedule;
- iii) details of who will be responsible for the continuing implementation
- iv) details of any phasing arrangements

### **3. Open Space Provision**

It is not clear from the information submitted if proposal would meet the relevant open space requirements for this development. 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 (where applicable) provision within the site. The applicant should demonstrate compliance with the South Dublin County Development Plan 2016-2022 in relation to provision of public open space.

The overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element. Within that standard, there are specified percentages as set out in Table 8.2 which must, as a minimum, be provided on site.

### **4. Boundary Treatment**

The applicant is requested to submit elevation drawings specifying the proposed boundary treatment for the entire site.

### **5. 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 m<sup>3</sup>. Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m<sup>2</sup> are proposed such as, green roofs, permeable paving, buildings, roads and their respective runoff coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

#### **6. 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](#)

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**Executive Parks Superintendent**

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