

## SOUTH DUBLIN COUNTY COUNCIL



### INTERNAL MEMORANDUM

#### Public Realm Planning Report

<b>Development:</b>	Two 2 storey dwellings and associated site works on the site and adjacent to an existing 2 storey dwelling. (For clarity the existing dwelling Lynbrook is to remain). Proposed dwellings A: 4 bedrooms 241sqm, B: 5 bedrooms 240sqm. Access is proposed to be by an existing driveway from the Whitechurch Road serving the existing dwelling on site. The driveway will be extended to serve the proposed dwellings, 4 car parking spaces, on site drainage treatment, additional soft and hard landscaping are proposed.
<b>Location:</b>	Lynbrook, Whitechurch Road, Rathfarnham, D16T2P7
<b>Applicant:</b>	<b>Nicola Lynch, Brian Dunne, Ciara Lynch and Richard O' Farrell</b>
<b>Reg. Ref:</b>	SD22A/0403
<b>Report Date:</b>	<b>21/02/2023</b>
<b>Recommendation:</b>	<b>GRANT WITH CONDITIONS</b>
<b>Planning Officer:</b>	EVAN WALSH
<b>Land Use Zong:</b>	<b>Objective RES "To protect and/or improve residential amenity"</b>

#### Main Concerns:

- Lack of GI Plan and GSF calculator worksheet. The applicant is required to achieve a minimum GSF score of 0.5 for the development site.
- Lack of SUDS Plan

#### 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**

**Public Realm Comments:**

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

The Public Realm Section would still have concerns regarding the above application and its potential impact on the Whitechurch Stream and associated blue/green infrastructure considering the close proximity of the proposed structures (two 2 storey dwellings) to this important water course. In addition, given the sensitive nature of the site the Public Realm Section would also have concerns as to the potential impacts of this proposed development on the existing trees, ecology and associated biodiversity within the subject site.

In terms of Public Realm requirements, the following ADDITIONAL INFORMATION was provided by the applicant:

Item 1. The applicant is requested to submit the following information:

(a) A 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: 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.

**By Way of a response the applicant has provided the following information:**

Gannon + Associates Landscape Architects:

- Landscape Design Rationale, Specifications & Maintenance Plan
- Landscape Plan: 22113\_LP\_01 (A2)
- Landscape Plan\_Planting: 22113\_LP\_011 (A2)

**Parks Response: This submitted Additional Information is in principle acceptable to the Public Realm Section and shall be implemented in full by the applicant.**

(b) 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. 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.

(i)The applicant shall significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site.

(ii)Demonstrate how natural SUDs features can be incorporated into the design of the proposed Development.

**By Way of a response the applicant has provided the following information**

Gannon + Associates Landscape Architects:

- Landscape Design Rationale, Specifications & Maintenance Plan
- Landscape Plan: 22113\_LP\_01 (A2)
- Landscape Plan\_Planting: 22113\_LP\_011 (A2)

McCrae Consulting Engineers:

- 5558-MCE-XX-XX-DR-C-0001\_Flood Risk Assessment Lynbrook
- 5558-MCE-XX-XX-DR-C-0001\_Infrastructure Services Report Lynbrook
- 5558-MCE-XX-XX-RP-C-0001\_FIR SuDS Report LYNBROOK
  
- 5558-MCE-XX-XX-DR-C-0100\_Mainswater Layout (A1)
- 5558-MCE-XX-XX-DR-C-0003\_Proposed Surface Water Layout (A1)

**This submitted Additional Information is in principle acceptable to the Public Realm Section and shall be implemented in full by the applicant. However, the applicant has provided little in the way of natural SUDS, the applicant is therefore requested to incorporate natural SUDS features into the surface water drainage design, Examples of SuDS include Green Roofs, Permeable Paving, Swales, Tree Pits, Rain Gardens and other such SuDS. In addition, the applicant is requested to submit A comprehensive SUDS Management Plan.**

(c) 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.

**Parks Response: The applicant has not provided sufficient information in terms of the GI and how the proposal will interact with and connect wit the wider GI network and this existing riparian corridor along the river.**

Boundary Treatment

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

**By Way of a response the applicant has provided the following information**

**Architectural Documents & Drawings (6 Copies):**

**Brock Finucane Architects:**

- Architectural Design Statement & Planning Report
- 2003\_P000\_Site Location Map (A3)
- 2003\_P001\_Site Plans (A1)
- 2003\_P101\_Proposed Ground Floor Plan (A1)
- 2003\_P102\_Proposed First Floor Plan (A1)
- 2003\_P103\_Proposed Roof Plan (A1)
- 2003\_P201\_Proposed Sections (A1)
- 2003\_P301\_Existing Elevations (A1)
- 2003\_P302\_Proposed Elevations 1/2 (A1)
- 2003\_P303\_Proposed Elevations 2/2 (A1)
- 2003\_P401\_Proposed Dwelling Layouts (A1)
- 2003\_P601\_Elevations- Fenestration (A1)
- 2003\_P701\_Site Boundary & Subdivision (A3)

**Parks Response – the submitted information is acceptable to the Public Realm Section.**

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.

Note: If tree pits are proposed, SuDS bioretention Tree pits to be installed in trees within /draining areas of hard standing. Tree Pits to incorporate SuDS bioretention features and sufficient growing

medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. 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 run off coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

**Parks Response: The applicant has provided little in the way of SuDS (Sustainable Drainage Systems) features for the proposed development. The applicant is required to submit a drawing in plan and cross-sectional views clearly showing proposed Sustainable Drainage Systems (SuDS) features for the development. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'**

Green Infrastructure & 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 Green Space Factor (GSF) will be achieved for the relevant land use zoning objective.

**Parks Response: The applicant has not sufficiently addressed the issues raised above or provided the required information as requested.**

**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 CONDITIONS be applied:**

**1. Implementation of Landscape Plan**

The proposed landscaping scheme shown on drawing No. 22113\_LP01 (A2) Landscape Plan shall be implemented in full, within the first planting season following completion of the development, in addition:

- a) All hard and soft landscape works shall be completed in full accordance with the submitted Landscape Plan (drawing No. 22113\_LP01 (A2)) and associated Planting Plan (Drawing No. 22113\_LP\_011 (A2)).
- b) All trees, shrubs and hedge plants supplied shall comply with the requirements of BS: 3936, Specification for Nursery Stock. All pre-planting site preparation, planting and post-planting maintenance works shall be carried out in accordance with the requirements of BS : 4428 (1989) Code of Practice for General Landscape Operations (excluding hard surfaces).
- c) All new tree plantings shall be positioned in accordance with the requirements of Table 3 of BS 5837: 2012 “Trees in Relation to Design, Demolition and Construction – Recommendations”.
- d) Any trees, shrubs or hedges planted in accordance with this condition which are removed, die, become severely damaged or become seriously diseased within three years of planting shall be replaced within the next planting season by trees, shrubs or hedging plants of similar size and species to those originally required to be planted.

**REASON: To ensure satisfactory landscape treatment of the site which will enhance the character and appearance of the site and the area, in accordance with the policies and objectives contained within the CDP 2022-2028.**

**2. Practical Completion Certificate**

A Practical Completion Certificate is to be signed off by the Landscape Architect when all landscape works are fully completed to the satisfaction of the planning authority in accordance with the permitted landscape proposals.

**REASON: To ensure that the development achieves a high standard of design, layout and amenity and makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm in accordance with relevant policies in the CPD 2022-2028.**

### **3. Natural SUDS**

There is a lack of SuDS (Sustainable Drainage System) 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 2022-2028 and the SDCC Sustainable Drainage Explanatory Design and Evaluation Guide 2022.

- (a) The applicant shall show further proposed SuDS features for the development such as Green roofs, grass areas, tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS.

**REASON:** To prevent the increased risk of flooding and to improve and protect water quality, in accordance with relevant policies of the CDP 2022-2028.

### **4. SUDS Management Plan**

A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation.

Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as rain gardens, detention basins, filter drains, swales etc.

**REASON:** To prevent the increased risk of flooding and to improve and protect water quality, in accordance with relevant policies of the CDP 2022-2028.

### **5. Green Infrastructure and Green Space Factor (GSF)**

The applicant shall submit the following information in terms of GI and the GSF 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](#)

**REASON: In the interests of the amenity and environmental quality of the locality and to assimilate the development into its surroundings, in accordance with policy GI5 Objective 4 and other relevant policies relating to GI within the CDP 2022-2028.**

#### **6. Invasive Species Report**

The applicant is requested to submit an Invasive Species Report which includes a detailed survey for the presence of invasive species within the subject site (as listed on the third schedule of the European Communities (Birds and Natural Habitats Regulations 2011). If invasive species are found to be present within the subject site that the applicant shall submit a site specific Invasive Species Management Plan.

**REASON:** To ensure the protection of the natural Heritage of the site in accordance with relevant policies and objective of the CDP 2022-2028

#### **7. Riparian Corridor**

As required under Section 12.4.3 Riparian Corridors of the CDP 2022-2028, The applicant is required to submit detailed information in relation to the following:

- (i) 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 hydro morphology;
- (ii) what measures will be put in place to protect the existing native riparian vegetation along the Whitechurch Stream and ensuring that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any development site.

**REASON:** To ensure the protection of Riparian Corridors in accordance with relevant policies and objective of the CDP 2022-2028.

#### **8. Tree Protection**

All tree protection measures outlined in the submitted Arboricultural Report and on the Tree Constraints Plan (Dwg. No DR:0001-02) prepared by Dermot Casey Tree Care shall be implemented in full by the applicant. In addition:

- a) All trees to be retained shall be protected by secure, stout exclusion fencing erected at a minimum distance equivalent to the branch spread of the trees and in accordance with BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction;

- b) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, or disposal of liquids shall take place within any area designated as being fenced off or otherwise protected in the approved protection scheme.
- c) Protective fencing shall be retained intact for the full duration of the development hereby approved and shall not be removed or repositioned without the prior written approval of the Public Realm Section.

**Reason: To ensure the safety and well-being of the trees on the site that are to remain after building works are completed, in accordance with relevant policies and objectives of the CDP 2022-2028.**

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**Prepared By: Oisín Egan**  
**Executive Parks Superintendent**

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**Endorsed By: Laurence Colleran**  
**Senior Executive Parks Superintendent**