

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM PUBLIC REALM PLANNING REPORT

Development: Construction of a new all-weather pitch complete with perimeter fencing and floodlights and all associated site works.

Location: Tallaght Town AFC, Carolan Park, Ballmena Lane, Kiltipper, Tallaght, Dublin 24

Applicant: Tallaght Town AFC

Reg. Ref: **SD23A/0204**

Report Date: **16/10/2023**

Planning Officer: DARREN FAGAN

Recommendation: **REQUEST ADDITIONAL INFORMATION**

Land Use Zoning: **Objective RU - To protect and improve rural amenity and to provide for the development of agriculture**

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

South Dublin County Council’s Tree Management Policy “Living with Trees” 2021-2026

The overall aims of the Tree Management Policy are to ensure the safety of Council trees, maintain and encourage biodiversity, maintain and improve landscape quality, and through these elements, improve the quality of life for residents and visitors to South Dublin now and in the future. We will achieve this by:

- ensuring that the Council has a clear programme of tree maintenance, management and planting;
- maintaining and improving the tree canopy cover for the future;
- appropriate siting and species selections for all new trees;
- promoting the importance of trees in shaping the distinctive local character and appearance of South Dublin’s urban landscape; recognizing the significant aesthetic, landmark, ecological, social and economic value that trees provide;
- effectively communicating, educating and engaging with the local community on trees and their importance;
- allocating sufficient resources to allow for best practice tree management
- providing clarity over why decisions and actions are taken;
- balancing the risk and nuisance to persons and property

MAIN CONCERNS:

- The proposed development is located on an elevated site in an area that is considered sensitive from an ecology and biodiversity point of view. The proposed development is located in close proximity to Kiltipper Park and mature boundary hedgerows and trees. The Public

Realm Section would have concerns regarding the impact of the proposed development in terms of:

- Flood Lighting – the proposed floodlight will have a negative impact on wildlife in particular bats who use the adjacent hedgerow and park as a foraging route.
 - Visual Impact – the proposed development will have a negative visual impact on the existing landscape due to its elevated position.
 - Landscape Character – the proposed development will have a negative impact on the existing landscape character of the site.
- The proposed landscape plan lacks detail and is therefore not acceptable to the Public Realm Section
 - The proposals have not sufficiently demonstrated compliance with GI policies as set out in the CDP 2022-2028. The applicant is required to submit a GI Plan.
 - The applicant has not demonstrated compliance in terms of the requirement to achieve the appropriate Green Space Factor for the development.
 - There is a lack of SuDS (Sustainable Drainage Systems) shown for the proposed development. 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 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.

The Public Realm Section welcomes the revised location of the proposed Astro pitch away from the mature boundary hedgerow and proposals to fit cowls on proposed lighting and the planting proposals. However, the proposed landscape plan lacks detail in terms of:

- GI,
- SUDS,
- Tree and Hedgerow Protection Measures,
- Planting details and
- proposed maintenance and management schedules.

LANDSCAPE PLAN

The submitted landscape plan lacks detail and contains non-native tree and shrub species and also Ash (*Fraxinus excelsior* – which should be excluded due to the prevalence of ash dieback *Hymenoscyphus fraxineus*) as part of the planting schedule - This is not acceptable to the Public Realm Section. The applicant is required to submit a revised and fully detailed 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 landscape plan should be prepared by a suitably qualified landscape architect/consultant. The current layout is not in compliance with relevant policies in terms of Landscaping set out in the CDP 2022-2028 including **G11 Objective 4**.

PROPOSED FLOODING LIGHTING

The Public Realm Section would still have some concerns regarding the potential impact of the proposed flood lighting associated with the new all-weather pitch on biodiversity in particular neighbouring wildlife associated with the mature boundary hedgerows. However, the revised location of the pitch away from the existing hedgerow and the incorporation of propose lighting cowls should help to minimise these impacts.

Artificial light can disturb invertebrate feeding, breeding and movement, which may reduce and fragment populations. The detrimental impact of lighting on bats is well recognised. In addition to causing disturbance to bats at the roost, artificial lighting can also affect the feeding behaviour of bats. Lighting can also affect feeding behaviour and commuting. Studies have shown that continuous lighting in the landscape, such as along roads, hedgerows or waterways, creates barriers which many bat species cannot cross, especially the slower-flying species, even at very low light levels.

The Public Realm Section welcomes the following lighting mitigation measures proposed:

- Compensatory native hedgerow proposed around carpark perimeter (min 100m)
- Creation of a 1 meter vegetative buffer along the existing mature boundary hedgerows to benefit local bat populations
- Use of lighting cowls on proposed floodlights to direct lighting to ground level.

However, The applicant is requested to provide a detailed environmental lighting impact assessment.

In addition to the above the following Mitigation measures shall be included:

- (i) Hours of illumination – provide some hours of darkness.
- (ii) Light levels – install lighting that meets the lowest light levels permitted under health and safety.
- (iii) Column heights of lamp posts – reduce the amount of light spillage where it is not needed by restricting the height of lamp columns.

- (iv) Type of lamps and luminaries to be installed –directional lighting means lighting is directed to where it is needed and thus preventing light spillage and light pollution.
- (v) Using modern light technology that restricts the horizontal plane of the luminaries thereby directing the lighting to where required.

The Public Realm Section in general recommends an absence of artificial illumination and glare, acting upon features considered to be of high biodiversity value such as hedgerows and trees and on associated buffer zones. The Public Realm Section, therefore in consultation with our Heritage Officer would recommend that the flood lighting component relating to this proposed development should be removed completely.

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;

The proposed development 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 2022-2028, 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. 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 applicant has not demonstrated through the development proposals how they have contributed and enhanced GI through the provision of green infrastructure elements as part of the application. 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 applicant has not complied with the requirement to achieve the required Green Space Factor (GSF) score for their land use zoning objective as set out in the CDP 2022-2028. The applicant is

required to submit a completed GSF worksheet with the Green Infrastructure Plan and Landscape Plan in support of a proposed development.

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 that the following ADDITIONAL INFORMATION be requested:

1. Landscape Design Proposals

The applicant is requested to provide detailed landscape design for the proposed development including Landscape Design Statement/Rationale and detailed 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 applicant shall include only native species trees and shrubs will the landscape plan. Aay proposed non-native species including proposed Ash (*Fraxinus excelsior*) shall be removed and replaced with native varities.
- iv. 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.
- v. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site.

- vi. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development.
- vii. 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. Tree and Hedgerow Survey

The applicant is requested to submit a comprehensive Tree Report. This Tree Report shall comprise of the following:

- (i) a detailed Tree Survey,
- (ii) Arboricultural Impact Assessment,
- (iii) Tree Constraints Plan,
- (iv) Tree Protection Plan and
- (v) Arboricultural Method Statement

All of the above shall be in accordance with BS 5837: 2012 Trees in relation to design, demolition and construction - recommendations. The Tree Report shall be carried out by an independent and qualified Arborist.

3. Bat Assessment

The recommendations contained with the Bat Assessment shall be incorporated into the revised landscape layout and all recommendations shall be implemented in full.

4. Landscape and Visual Impact Assessment

The applicant has provided little or no information as to the landscape and visual impact of the proposed development. The applicant is requested to provide a detailed landscape and visual impact assessment including photo montages for the proposed development. The Visual Impact Assessment should identify key viewpoints to the site from the surrounding area, including CGI of existing views and views of the proposed development.

5. Detailed Lighting Assessment

The applicant is requested to submit a detailed lighting assessment for the proposed flood lighting.

The Lighting assessment as a minimum should include the following information:

- (i) a description of the proposed hours of operation, light spillage, light levels and column heights
- (ii) a layout plan of the proposed development site showing beam orientation.
- (iii) details of the proposed equipment design
- (iv) details of the expected impact on neighbouring properties and roads
- (v) a statement of any proposed measures to mitigate or compensate for the possible impacts of the proposed development.

6. Lighting design strategy (biodiversity)

The applicant is requested to submit a Detailed Lighting Design Strategy for Biodiversity for the proposed flood lighting associated with the new all-weather pitch. The strategy shall include the following information:

- (a) identify the areas or features on the site that are particularly sensitive for bats and identify the aspects of the development that would be likely to cause disturbance in or around the breeding sites and resting places of bats or along important routes used to access key areas of their territory; and
- (b) show how and where all the proposed external lighting will be installed and demonstrate (through the provision of appropriate lighting contour plans and technical specifications) that those areas to be lit will not disturb or prevent the above species using their territory or gaining access to their breeding sites, resting places and foraging areas.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved strategy, and no other external lighting shall be installed without prior express consent from the planning authority.

7. Sustainable Drainage Systems (SuDS)

The applicant shall submit a drawing in plan and cross-sectional views clearly showing proposed Sustainable Drainage Systems (SuDS) features for the development. In terms of SUDS the applicant is requested to provide the following information:

- (i) A SuDS proposal that complies with *SDCC SUDS Explanatory Design an Evaluation Guide 2022, and SDCC County Development Plan 2022-2028*.
- (ii) The SuDS proposals should be a collaboration between landscape architect and the drainage engineer to integrate the SuDS into the landscape design proposals providing amenity, biodiversity, water quality treatment as well as quality and attenuation.

- (iii) Plans showing existing and proposed flows.
- (iv) Investigate the use of existing natural ditches and hedges as part of the overall SuDS proposal.
- (v) Details on how each SuDS component function as part of the overall treatment train.
- (vi) Demonstrate the biodiversity, amenity, water quality and attenuation value of all SuDS features
- (vii) 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.

8. 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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