

Chapter 15: Development Management Standards

15.2.5 Soft Landscaping

We note and welcome the following sentiment and provide the following amendments:

Planting and landscaping should be used to incorporate new buildings into their surroundings and provide privacy between dwellings. New planting should consist of local native plant types with consideration given to provenance and origin of plants indigenous to the area and be incorporated into the site to enhance overall appearance and conserve biodiversity (Refer to Table 15.2) and contribute to the green infrastructure of the area.

- *Please note that there is no table labelled 15.2 in this Chapter*
- *We note here the utility of having a glossary of technical terms as suggested by the **Draft Development Plans Guidelines for Planning Authorities 2021**, and direct the author to please see our comments in Chapter 12 in relation to the internationally accepted definition of biodiversity and its components.*
- *Given the lack of native tree stock nationally, we need to be aware of the significant threat currently posed to our native biodiversity from the importation of mal-adapted genotypes and the recognised risk of importing pests and diseases (particularly microorganisms) on imported stock, (Please refer to our comment in Chapter 12 and the following:*
 - *O’Hanlon et. al. 2021 Catalogue of Pests and Pathogens of Trees on the Island of Ireland. Biology and Environment: Proceedings of the Royal Irish Academy*
 - *“In the last decade however, the greatest risk to trees and forests on the island of Ireland is the introduction of non-native pests and pathogens.”*
 - *Recommendations highlighted in the **Draft Kildare County Development Plan 2023-2029 - SEA Environmental Report** that native plants of local provenance be planted:*
 - *<https://consult.kildarecoco.ie/en/system/files/materials/4060/Draft%20Kildare%20CDP-%20SEA%20Environmental%20Report%20Final%20Issue.pdf>*
 - *For **definitions of provenance and origin**, please refer to:*
 - **Go Native. Guidelines for planting projects in the countryside:**
 - *“Origin is the place in the wild from which the original seeds or plants were collected. This is not to be confused with provenance, which is often the location of the nursery where seeds are produced or plants grown”*
 - *<https://cieem.net/wp-content/uploads/2019/07/Go-native-Planting-for-biodiversity-Flora-locale-good-practice-guidelines.pdf>*
 - *Or: <https://naturalresources.wales/media/3119/choosing-provenance-in-broadleaved-trees.pdf>*

Additionally, we comment on the following:

The Planning Authority will require the following in relation to site development and landscaping works:

- *The planting of semi-mature trees depending on location and circumstances. Proposals to provide semi-mature trees of appropriate species (as set out in Table 15.2) in suitable prominent locations within a development site will be considered favourably.*
 - **Comment:** *It is unlikely that developers will be able to obtain semi-mature trees of local provenance and origin unless we develop and support an indigenous Nursery Stock sector in Kildare (please see our comments in Chapter 9)*
- *A detailed replanting proposal shall be submitted should the removal of hedges / trees be required during development, those to be removed shall be identified on drawings. This proposal should provide for the replacement of, at minimum, an equal amount of similar indigenous hedgerows **species, of native provenance and origin** and the planting of a minimum of five mature / established trees per tree felled. These shall be incorporated into the overall design of the scheme. The replacement of hedgerows / trees shall have due regard to the ecological function of hedgerows as a wildlife corridor and shall not work in isolation from the remaining hedgerow network.*
- *Landscaping works should incorporate sustainable urban drainage systems such as ~~biodiversity areas~~ or **established native vegetation or wetlands**, which can reduce surface water run-off. Green roofs, walls, and permeable surfaces will be encouraged. The Council commits to ensuring that the construction of SuDs or other nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.*
- **Comment:** We recognise the value and need for Sustainable Urban Drainage systems (SuDs) and other nature-based solutions; however, we would like to emphasize the following:
 - The **primary nature-based solution** should be to leave **established native vegetation *in situ*, wherever possible, to intercept runoff.**
 - **It is important to note that SuDs have the capacity to disrupt and undermine the integrity of native flora** when generic (often imported) swale, pond and other green infrastructure plants or seed mixtures are employed. Often planting specifications provided by landscape consultants are from generic lists of swale ‘wildflower’ mixes, or pond plants, and these plant mixtures bear little or no resemblance to natural pond floras or the flora of the surrounding area.

- <https://dnfc.net/wildflower-seed-mixtures/>
 - <https://pollinators.ie/wildflower-seed/expert-opinions/>
- Additionally, **aquatic plants are some of the world’s most problematic invasive** organisms, many are **extremely difficult to identify accurately to species level** (relevant botanical expertise is required), and **mis-identified invasive species are often sold in garden centres and nurseries**, due to this difficulty.
- Aquatic plants are highly vagile and **disperse readily in nature**; therefore, left unplanted, **pond features will rapidly colonise from locally available material and this should be the preferred option**.
- **Any nature-based or green infrastructure solution** should therefore be under the explicit guidance of a **suitably experienced botanist/ecologist**. See: https://www.susdrain.org/files/resources/other-guidance/ecological_benefits_summary.pdf
- Additionally, please see our comments in Chapter 6 - 6.6 and Chapter 12 – 12.10

We note the following and suggest an amendment as follows:

*To ensure that trees and hedgerows are protected on a site and that all agreed landscaping is carried out, a bond or cash lodgement ~~may be~~ **will be** required as part of a grant of planning permission, the amount of which shall be determined by the Council.*

We note the following and comment as follows:

The Good Practice Guidelines for Developers – Biodiversity and Development in County Kildare, Kildare Heritage Series Volume 1 and The Good Practice Guidelines for Householders – Biodiversity and Development in County Kildare, Kildare Heritage Series Volume 2 should also be referenced for advice regarding landscaping and biodiversity matters. Soft landscaping proposals for public areas shall also be assessed having regard to the principles of the Urban Design Manual Best Practice Guide (DEHLG, 2009), as appropriate.

- Comment: Please obtain access to ecological expertise and revise these publications to more recently published, **ecologically-guided Best Practice Guides** to protect our native biodiversity. For example:
 - **Go Native. Guidelines for planting projects in the countryside:**
 - <https://cieem.net/wp-content/uploads/2019/07/Go-native-Planting-for-biodiversity-Flora-locale-good-practice-guidelines.pdf>

Table 0.2 Native Trees and Shrubs

Please note that it is **no longer permissible to plant Ash trees in Ireland** due to the presence of *Hymenoscyphus fraxineus*.

- This is a fungal organism which was imported into Ireland on plantation stock in 2012 and is responsible for the **Ash Dieback disease** which is currently destroying our native ash trees (and the multiple species they support), and causing devastation in hedgerows and fields throughout the country. In other words, this imported fungal organism is responsible for massive biodiversity loss in Ireland.

15.4.5 Design, Layout and Boundary Treatments

We note and welcome the following:

The layout of residential housing should avoid backing onto historic field boundaries which contain mature trees and/or established hedgerow. Such features shall, as far as practical, be fully addressed by the development, and integrated into the open space provision as a design and green infrastructure feature. Furthermore, any development adjacent to a high amenity area (such as the Curragh) will require a soft boundary and/or approval by the Heritage Officer for boundary treatments. Further requirements in relation to soft landscaping features are outlined in Section 15.2.5.

15.7.6 Access Requirements

We draw your attention to the following and amend as follows:

*Where the removal of hedgerow is required in order to achieve sight lines, the minimum amount of hedgerow shall be removed (see 15.2.5 above). Any new boundary should be planted with suitable indigenous species of *local provenance and origin* as outlined in section 15.2.5.*

General comments on this section

- We note and draw your attention to the recommendations in relation to hedgerows in the **SEA Environmental Report for the Kildare County Development Plan 2017-2023**
 - <https://consult.kildarecoco.ie/en/system/files/materials/4060/Draft%20Kildare%20CDP-%20SEA%20Environmental%20Report%20Final%20Issue.pdf>
 - *Including:*
 - **Require** that proposals retain and maintain existing hedgerows in all instances, with the exception only of the section required to be removed to provide visibility at the proposed site entrance. On such cases, proposals for replacement hedgerows, including details of composition and planting must be submitted with any application which requires such removal.
 - It is an objective of the Council to only permit the removal of hedgerow where the removal of same has been clearly demonstrated, to the satisfaction of the Planning Authority, to be necessary for the development of a solar farm(s)
 - Consider the removal of trees (singular or in stands) and hedgerows (in part or in whole) only in circumstances where it can be clearly demonstrated that the removal of hedgerow material and or tree(s) is essential for the provision of energy and cannot be designed out. Where proven, the vegetation is to be replaced with equivalent number, species, variety and size as was in situ. Where non-native species are removed, they will be required to be replaced with native species. In all cases, plants of local provenance are to be planted within 1 year of removal and maintained to establishment to negate

the habitat and biodiversity loss within 3 years. Existing vegetative or 'stepping-stone' linkages are to be maintained and improved upon to increase wildlife corridors.

- Recognise the important contribution trees and hedgerows make to the county biodiversity resource climate mitigation, resilience, and adaptation
- Prevent, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, same must be clearly and satisfactorily demonstrated to the Planning Authority.

Promote the integration of boundary hedges within and along development sites into development design so as to avoid "trapped hedges" located to the boundary of houses within the development layout.

- **Go Native. Guidelines for planting projects in the countryside:**
- <https://cieem.net/wp-content/uploads/2019/07/Go-native-Planting-for-biodiversity-Flora-locale-good-practice-guidelines.pdf>

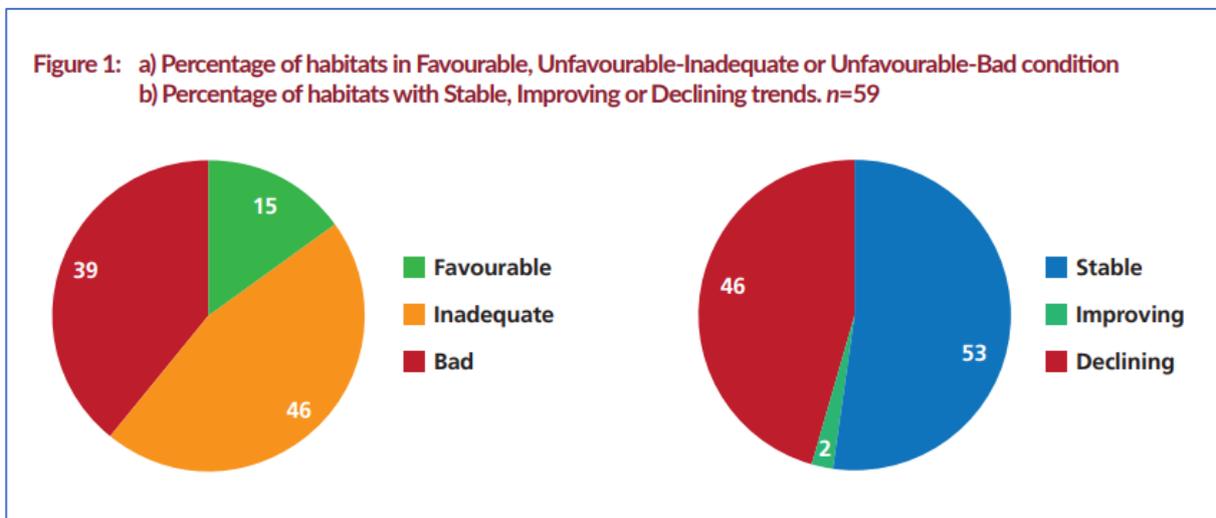
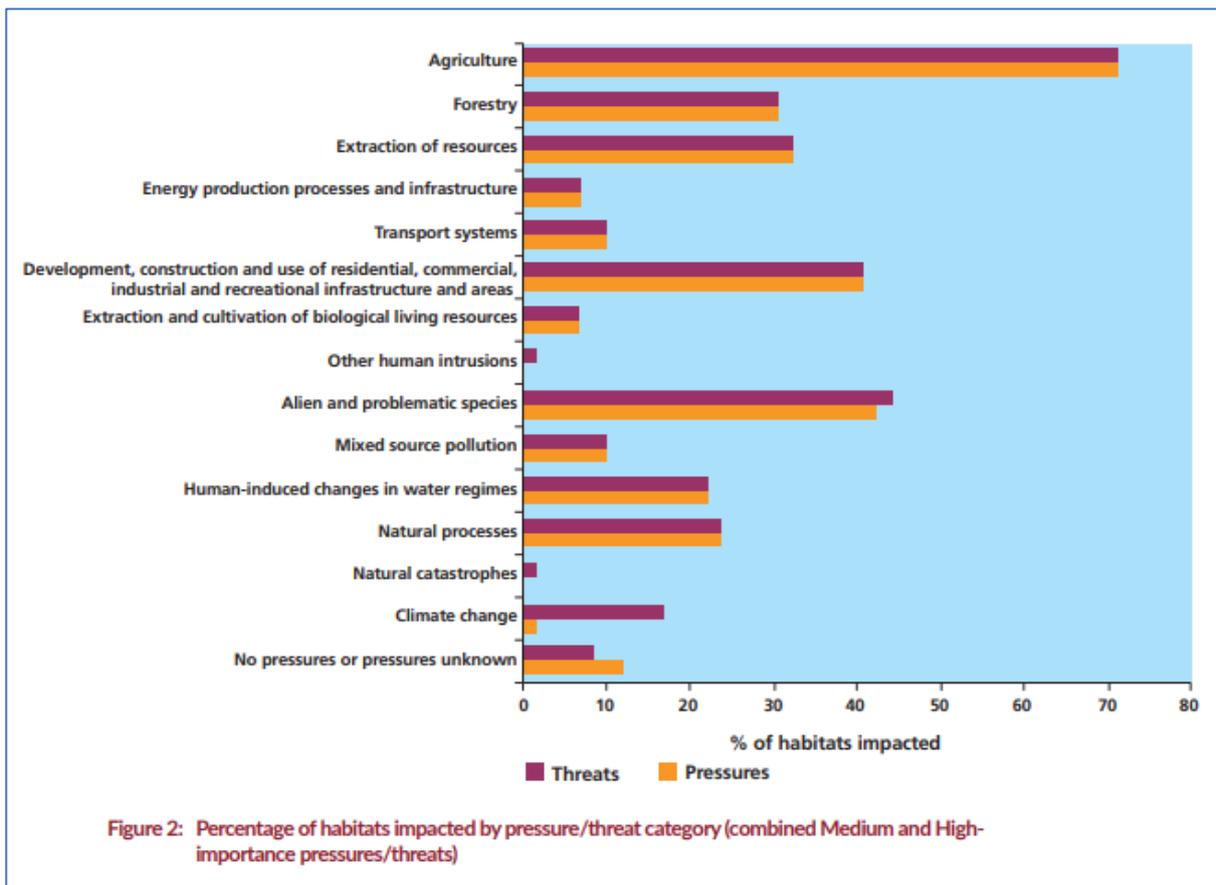
15.6 Open Space

15.6.4 Natural / Semi-Natural Green Space and Green Corridors

We note the following and suggest an amendment:

Natural / Semi-Natural Green Space (e.g., undeveloped, or previously developed land with habitats such as woodland or wetland areas) and Green Corridors (linear green spaces such as canal and river corridors) also provide valuable open space ~~enhancing~~ conserving biodiversity, and enhancing natural drainage, and carbon storage.

- Please note that there are **very few intact natural habitats** left in Ireland.
- And our **semi-natural habitats are rapidly disappearing**, particularly with the intensification of agriculture and high rate of development. Even those sites given the highest protection in Ireland are in bad condition. See figure below and **The Status of EU Protected Habitats and Species in Ireland 2019** (https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf)
- This is **why it is so important that we conserve and protect as many of our remaining natural and semi-natural habitats to support the species they contain.**
- Please be aware, in general, rare species are rare because their habitats are rare. So, while the Green Corridor concept is useful for mobile species, **rarer plant species cannot forego their ecological requirements** and hop along this highway. Consequently, distance to other suitable habitats with similar ecological conditions is of key importance for dispersal, i.e. whether seeds or spores can viably made it there and establish.
- Additionally, rarer species tend to be trustworthy indicators of the quality of the habitat.



The Status of EU Protected Habitats and Species in Ireland 2019

https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf

15.6.6. Public Open Space for Residential Development

We refer to the following and amend:

Open space shall be provided within the development site as follows:

- *On greenfield sites, the minimum area of open space that is acceptable within the site is 20% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species *of native provenance and origin* and pollinator friendly areas (which refer to recommendations from **the most recent version of the All-Ireland Pollinator Plan**) and ~~enhance~~ *help to conserve biodiversity up to a maximum of 8%.*
 - Please note we can “enhance” green infrastructure but we must seek to conserve and protect our native biodiversity (please refer to our comments in Chapter 12)
 - Please note. **Landscape consultants or contractors are not trained botanists/entomologists/ecologist.** Often specifications are for the distribution of commercial ‘wildflower’ mixes. These plant mixtures bear little or no resemblance to the flora of the surrounding area and have the potential to impact on our native biodiversity. Please refer to:
 - <https://dnfc.net/wildflower-seed-mixtures/>
 - <https://pollinators.ie/wildflower-seed/expert-opinions/>*
- On institutional sites a minimum requirement of 25% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species *of native provenance and origin* and pollinator friendly areas which enhance biodiversity up to a maximum of 10%.
 - *As above*
- In all other cases, public open space should be provided at the rate of 15% of the total site area (at a minimum). This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 6%.
 - *As above*