

Uimhir Thagarta Uathúil: SD-C195-281 Stádas: Submitted Submission: Priorities and suggestions from Dublin Friends of the Earth Údar: Dublin Friends of the Earth

**Comhairliúchán:** Draft South Dublin County Development Plan 2022 - 2028

## **Chapter 4: Green Infrastructure**

Caibidil: Volume 1: Written Statement » Chapter 4: Green Infrastructure

There has been good work done in some areas of SDCC in relation to wilding public spaces and parks. Patches of wild flowers can be found along road-sides and in parks which drastically improve the look of the area and also provide a haven for urban wildlife and insects. These patches require minimal care and maintenance yet make such a wonderful difference. Wild spaces in our public parks and in other spaces such along roadsides and in waste-ground spaces should be a core element of development design. Allowing grass patches to grow and allowing wildflowers to grow is hugely beneficial for pollinators and biodiversity generally. In terms of development standards it is imperative that native flora and fauna species are protected and facilitated to flourish in our green spaces.

Globally, there has been a serious drop in the amount of flying insects due to a myriad of factors. Green spaces should be designed to prioritise the needs of pollinators and indeed other urban wildlife and birds. This could include planting more native trees and plants; introduction of insect hotels on small waste-ground patches in sdcc and incorporation of water features to attract birds.

On your website we could not easily locate biodiversity information. It is not listed in the 'plan' section: https://www.sdcc.ie/en/services/our-council/policies-and-plans/. Biodiversity was also not listed in the alphabetical index on your home page. Under 'services/enviroment' we could not see a biodiversity section. Is your biodiversity plan still in draft stage? We do welcome your pollinator plan. The tree planting programmes on your website are from spring 2020, are you planning same for winter 2021?

Dublin Friends of the Earth especially looks forward to the publication of the SDCC tree management policy as soon as possible. The previous one expired in 2020.

In relation to tree planting, we would like to advocate for the adoption of the Miyawaki method of forestry, which grows mature native forests 10 times faster and 100 times more biodiverse than conventional plantations. These mini forests would be ideal for very small patches of public lands (starting at a square metre), neighbourhoods, schools, hospitals and in the grounds of other properties e.g. offices blocks, churches, industrial estates etc. and would be havens for wildlife.

New developments:

Has SDCC considered implementing a type of 'tree balance sheet' that could be required for new developments? The balance sheet would clearly indicate what the size, condition, and species of trees/hedgerows to be removed for any development and similarly include what new trees (numbers, size and species) are to be planted within the development. This would ensure that existing mature trees and hedgerows of good condition would have to be replaced with high quality specimens of similar size and appropriate species.

We believe guidance and hard standards for the specification of trees to ensure that they are of decent size and quality should be introduced. Standards and quotas (like what is done for bicycle or car parking within most planning grants) could also be set to achieve a minimum number or area (if providing mass planting of young forest/woodland) of trees/whips, therefore future canopy cover, for new developments. Obviously the number and size of trees that can be planted within each development will vary due to site constraints, but this will at least ensure that applicants requesting permission for new developments (public and private) will have to argue a case for a reduction in specification and numbers and probably most importantly, it will focus the minds developers and design consultants during the planning process.

## Documents Attached: Níl