

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

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Area Planner
Planning Department

Development: Construction of 2 warehouses with ancillary office and staff facilities and associated development; Unit 1 will have a maximum height of 16.35 metres with a gross floor area of 8,156sq.m including a warehouse area (7,397sq.m), ancillary office areas (362sq.m) and staff facilities (397sq.m); Unit 2 will have a maximum height of 15.35 metres with a gross floor area of 5,990sq.m including a warehouse area (5,031sq.m), ancillary office areas (536sq.m) and staff facilities (423sq.m); vehicular access/egress routes to the subject site via the existing roundabout and access road; alteration to the existing access arrangements to the subject lands to facilitate safe traffic flow to/from the proposed facilities; pedestrian access; 109 car parking spaces; bicycle parking; HGV Parking; HGV yards; level access goods doors; dock levellers; access gates; signage; hard and soft landscaping; lighting; boundary treatments; ESB substation; sprinkler tanks; pump houses; and all associated site development works above and below ground on lands bounded to the south by the N7 Naas Road, to the north and west by the National Distribution Centre and to the east by Brownsbarn Drive and the Royal Garter Stables, a Protected Structure (RPS Ref. 261).

Location: Brownsbarn, Citywest Campus, Dublin 24.

Applicant: Exeter Ireland IV B Limited

Reg. Ref: SD21A/0162
Report Date: 10th Aug 2021
Recommendation: Additional Information

Main Concerns:

1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity.
2. Impacts of the proposed development on green and blue infrastructure.
3. Potential impacts on bats (foraging routes)
4. Lack of Sustainable Drainage Systems (SuDS) shown for the proposed development.
5. Boundary Details – lacking detail including fencing.
6. Visual impact of the proposed development.

Site Area

3.92 ha

Zoning

Objective EE - To provide for enterprise and employment related uses.

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

GREEN INFRASTRUCTURE (G) Policy 2 Green Infrastructure Network

G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.

G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

G2 Objective 3: To restrict development that would fragment or prejudice the Green Infrastructure network.

G2 Objective 4: To repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

G2 Objective 6: To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries, and increase hedgerow coverage using locally native species.

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.

G2 Objective 10: To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.

G2 Objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters etc. into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.

G2 Objective 12: To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the control of these species throughout the County.

G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species.

GREEN INFRASTRUCTURE (G) Policy 3 Watercourses Network

G3 Objective 1: To promote the natural, historical and amenity value of the County's watercourses and address the long-term management and protection of these corridors in the South Dublin Green Infrastructure Strategy.

G3 Objective 2: To maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case-by-case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy, 2015; the Greater Dublin Area Strategic Cycle Network; and other government plans or programmes will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments, as these routes increase the accessibility of the Green Infrastructure network.

G3 Objective 3: To ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations, to protect ground and surface water quality and build resilience to climate change.

G3 Objective 5: To restrict the encroachment of development on watercourses, and provide for protection measures to watercourses and their banks, including but not limited to: the prevention of pollution of the watercourse, the protection of the river bank from erosion, the retention and/or

provision of wildlife corridors and the protection from light spill in sensitive locations, including during construction of permitted development.

GREEN INFRASTRUCTURE (G) Policy 4 Public Open Space and Landscape Setting

G4 Objective 2: To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

G4 Objective 4: To minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.

G4 Objective 7: To avoid the cumulative fragmentation and loss of ecologically sensitive areas of the Green Infrastructure network to artificial surfaces...

GREEN INFRASTRUCTURE (G) Policy 5 Sustainable Urban Drainage Systems

It is the policy of the Council to promote and support the development of Sustainable Urban

G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.

G5 Objective 2: To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments.

INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 2 Surface Water & Groundwater

IE2 Objective 3: To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.

IE2 Objective 9: To protect water bodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains, within the County from inappropriate development. This will include protection buffers in riverine and wetland areas as appropriate (see also Policy G3 Objective 2 – Biodiversity Protection Zone).

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 15 Non-Designated Areas

HCL15 Objective 1: To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.

HCL15 Objective 2: To ensure that, where evidence of species that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 exists, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.

HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

Living with Trees – Tree Management Policy 2015 – 2020

South Dublin County Council's Tree Management Policy 'Living with Trees' 2015-2020 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites. Relevant points within this section include:

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- The Council will promote the replacement of trees removed to facilitate approved planning and development of urban spaces, buildings, streets, roads, infrastructural projects and private development sites.

The Public Realm Section has assessed the proposed development in accordance with the CDP and best practice guidelines and recommends the following:

1. Arboricultural Impact of the Proposed Development

The tree survey, impact assessment and protection measures do not include the young locally important immature woodland edge, WS2, in the west of the site or the trees close to the northern and north-eastern boundaries adjacent to the site. The tree survey, arboricultural impact assessment and tree protection measures should take note of these tree groups and incorporate measures in the arboricultural impact assessment to make sure there is no impact on these trees, e.g. positioning of storage areas/bunds etc. Every effort should be made to retain existing trees and woodlands where possible. Mitigation planting to ensure net gain. **ADDITIONAL INFORMATION**

2. Impact of Development Blue-Green Infrastructure/SuDS

The Public Realm Section consider that the proposed development is contrary to Policy G5 - Sustainable Urban Drainage Systems and Objectives G5 1 and G5 2 in the County Development Plan. The applicant should be requested to:

1. revisit the design and layout of the proposed development and demonstrate how the development will comply with these policies and objectives.
2. submit revised plans and particulars addressing item 1 and demonstrate how natural SuDS features can be incorporated into the design of the proposed development

The SuDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement. The applicant shall show further proposed SuDS features for the development such as Green roofs, SuDS tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. SuDS could be incorporated into measures to retain the woodland edge WS2 for example.

The revised plans should incorporate:

- I. more trees to break up the car park hard standing areas in the North East We require a tree every 5 parallel and 2 perpendicular car park spaces ensuring 5m separation from lighting columns. All car park trees and trees adjacent to hard standing should incorporated SuDS tree pits.
- II. A landscape section through the northern boundary. **ADDITIONAL INFORMATION**

3. Bat Survey

We note that a preliminary bat roost survey was carried out in February 2021 and a review of JBA/NBDC records within 2km an 10km was carried out. The applicant is requested to submit a bat

roost survey and a bat activity survey for bat usage for the entire site and immediately adjoining sites during summer period when bats active. The applicant should provide a site-specific assessment of the potential impact on these species arising from the proposed development. This is to be undertaken by a qualified and experienced bat expert at the appropriate time of the year for the survey of species.

ADDITIONAL INFORMATION

4. Boundary Details

The applicant is requested to provide details of Fence Type A and B and of fencing types along all boundaries. A boundary plan is required clearly stating what fencing/boundary wall treatments are to be provided. **ADDITIONAL INFORMATION**

5. Visual impact of the proposed development.

A photomontage should be provided of a view straight into the site from the Naas Road. The applicant should assess if screening along this boundary is sufficient and propose appropriate measures if not/augment proposed screening with further measures. **ADDITIONAL INFORMATION**

Summary

The proposed development in its current configuration will introduce significant hard infrastructure to a greenfield site having an effect on the existing trees, woodland planting and associated biodiversity and ecology within the development site area. This proposed development would materially contravene policy G5 Objective 1 other GI policies and objectives in the County Development Plan.

The Public Realm Section is requesting that the applicant alter the layout of the proposed development in order to ensure the integration of natural Sustainable Urban Drainage features that incorporate amenity and biodiversity and strengthen green infrastructure. Further information is also required in relation to tree protection, bats, visual impact and boundary treatment.

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