

**SOUTH DUBLIN COUNTY COUNCIL**



**INTERNAL MEMORANDUM**

**Department: Parks & Landscape Services / Public Realm**

**Date: 18/08/2021**

**SARAH WATSON**

**Area Planner**

**Planning Department**

**Development:** Construction of a gas fired power plant with an electrical output of up to 125MW with associated balance of plant, equipment and buildings including; an Engine Hall building with a height of 18.9m, comprising 6 gas engines and ancillary infrastructure; an Electrical Annex Building with a height of 18.7m; a Workshop building with a height of 5.1m; a Tank Farm building with a height of 5.68m; a Security hut with a height of 3.27m; an Exhaust Stack with a height of 31.8m; a Gas AGI including a kiosk with height of 3.3m; Radiator Coolers with a height of 8.46m; 2 electrical transformers with a height of 4.98m; Tanks including 2 x Diesel Oil Storage Tanks (volume of 2500m<sup>3</sup> combined); SCR Urea Tank (26m<sup>3</sup>); Lube Oil Storage Tank (26m<sup>3</sup>); Lube Oil Maintenance Tank (26m<sup>3</sup>); Pilot Oil Tank (26m<sup>3</sup>); Fire Water Storage Tank (1000m<sup>3</sup>); Effluent Collecting Tank (26m<sup>3</sup>); Underground Surface Water Attenuation Tank (490m<sup>3</sup>); 2 new access onto the existing private road network with Profile Park; 12 parking spaces, footpaths, landscaping; fencing and all other associated site development plant and equipment and other works including surface water and foul wastewater drainage.

**Location:** Profile Park, Ballybane, Clondalkin, Dublin 22

**Applicant:** Shane Minehane, Greener Ideas Limited

**Reg. Ref:** SD21A/0167

**Recommendation:** **ADDITIONAL INFORMATION**

### **Site Area**

1.9 ha

### **Zoning**

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

### **Main Concerns:**

1. We want to be sure the landscape proposals can be carried out where planting is shown above underground attenuation tanks.
2. Existing SUDs proposal is not sufficient and does not comply with the County Development Plan 2016-2022.

### **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**

**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.

In meeting the needs of development, the Public Realm Section seeks to ensure the appropriate protection and enhancement of **blue/green infrastructure** and the appropriate provision of **new blue/green infrastructure**.

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

**1. Landscaping**

The applicant is requested to provide a detail on how the landscape planting proposals above the proposed underground attenuation tanks will be done. The use of underground tanks should be avoided. SUDS should 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. SDCC do not approve of

using underground tanks as part of SuDS schemes where the full potential for the natural drainage features has not been explored. **ADDITIONAL INFORMATION**

## **2. SUDS**

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Natural SUDS features should be incorporated into the proposed drainage system that address amenity, biodiversity and water quality as well as volume attenuation. The use of underground tanks should be avoided.

The applicant shall show further proposed SuDS features for the development such as green roofs, living walls, further natural swales, channel rills, integrated tree pits, bioretention, above ground attenuation, detention basins, reed bed/wetland etc. and other such SuDS and show what attenuation capacity is provided by such SuDS. The SuDS features should be integrated into the landscape proposal and details provided on how they work. **ADDITIONAL INFORMATION**

### **Summary**

The proposed power station introduces significant hardstanding and prominent buildings into the landscape in its current configuration would materially contravene policy IE Objective 5 in the County Development Plan.

The Public Realm Section is requesting that the applicant provide details on how the landscape proposals can be undertaken above the proposed underground tanks and a landscape layout that ensures that a higher percentage of the soft natural SuDS features in the landscape.

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**Fionnuala Collins**  
**Assistant Parks Superintendent**

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