

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm

Date: 24/08/2021

SARAH WATSON

Area Planner

Planning Department

Development: Extension to the existing motor sales outlet with servicing area and associated development consisting of the construction of a single storey (double height) extension (c.568sq.m) to the existing motor sales outlet with servicing area which will comprise of a car body shop and valet area; single storey remote sales office (c.20sq.m); a covered bike shelter; ancillary petrol fill area; alterations to vehicle storage area; alterations and relocation of the exiting vehicle display provision (resulting in total of 79 defined display spaces (59 additional) together with indicative display areas with capacity for c.72 vehicles); a reduction in service spaces (resulting in total of 23 service spaces (3 less)) and relocation and additions to the existing staff car parking provision (resulting in total of 25 staff spaces (5 additional)); provision of a new pedestrian site entrance; signage (3 signs (4.45sq.m; 2.71sq.m; 0.58sq.m)); alterations and additions to the soft and hard landscaping, including the removal of existing fence; new boundary treatment and internal vehicle access gate; pedestrian paths and access; paving; tarmac and planting; relocation of vehicle sliding gate; an additional vehicle display podium; additional electric charging bays; new lighting; elevational changes to the existing building to facilitate the extension; an additional attenuation tank; all piped infrastructure and ducting; plant; all associated site development and excavation works above and below ground.

Location: Toyota Liffey Valley, Liffey Valley Motor Mall, Dublin 22

Applicant: Tom Staunton

Reg. Ref: SD21A/0184

Recommendation: Additional Information

Site Area

1.9 ha

Zoning

Objective MRC: To protect, improve and provide for the future development of a Major Retail Centre.

Main Concerns:

1. **Impacts of the proposed development on existing trees, hedgerows and local biodiversity.** No protection measures are shown for existing trees and hedgerows on /adjacent to the site.
2. **Impacts of the proposed development on green and blue infrastructure.** The proposal introduces large areas of hardstanding involving soil sealing. The SUDs proposal is limited to permeable paving and is not sufficient. SuDS should address amenity and biodiversity as well as water quality and attenuation. SDCC do not approve of using underground tanks as part of SuDS schemes where the full potential for natural drainage features has not been explored.

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 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 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. Protection of Existing Trees

There are concerns with the absence of information submitted in relation to protection of existing trees and hedgerows on /adjacent to the subject site. Tree and hedgerow protection to be proposed in accordance with BS 5837: 2012: Trees in Relation to Design, Demolition and Construction.

CONDITION

2. Landscaping and SUDS

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development, limited to permeable paving. The proposal introduces large areas of hardstanding involving soil sealing. SDCC do not approve of using underground tanks as part of SuDS schemes where the full potential for natural drainage features has not been explored. SUDS should be an integrated multi-disciplinary

approach which locally addresses amenity and biodiversity enhancement, water quality as well as attenuation and meets the objectives of South Dublin County Council Development Plan 2016-2022.

The applicant is requested to remove the proposed underground tank and provide above ground SuDS. Green roofs should be considered as well as other SuDS features such as swales, channel rills, integrated SuDS tree pits, bioretention. A SuDS strategy is required detailing how the SuDS work as a treatment train and what attenuation capacity is provided by such SuDS. The SuDS features should be integrated into the landscape proposal. **ADDITIONAL INFORMATION**

Summary

The proposed development introduces significant hardstanding involving soil sealing which in its current configuration would materially contravene policy IE2 Objective 5 and other green infrastructure policies and objectives in the County Development Plan.

The Public Realm Section is requesting that the applicant remove the underground tank and provide a SuDS strategy that delivers amenity, biodiversity, water quality treatment as well as attenuation. Landscape proposals should incorporate soft natural SuDS. Tree and hedgerows protection proposals according to BS 5837 are also required.

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Senior Executive Parks Superintendent