

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

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

Date: **03/09/2021**

**Sarah Watson,
Planning Department**

Development: Amendments principally comprising of an overall increase in the commercial floor area by 15,479sq.m from the permitted 13,959sq.m to 29,438sq.m; the permitted scheme has 3 internal ancillary office floor levels, and the proposed alterations provide 2 mezzanine levels in the warehouse area (i.e a total of 5 internal floor levels); the permitted maximum height of the development at 23.7 metres will remain unchanged; the additional 15,479sq.m development proposed will comprise an increase in the warehouse floor area from 12,369sq.m to 13,353sq.m, staff facilities from 548sq.m to 2,582sq.m and ancillary office area from 1,042sq.m to 2,437sq.m; in addition to the provision of a 2 storey mezzanine warehouse area (9,703sq.m), integrated plant room (434sq.m) and plant area on 2 floors (929sq.m); construction of a 2 storey car-parking area (4,057sq.m and 7.8m height) to accommodate an increase from the previously permitted 119 ancillary car parking spaces to 190 car parking spaces; 13 designated van parking spaces (no dedicated van spaces previously proposed); 72 permitted cycle parking spaces; reconfiguration of the HGV yard and an increase in the number of HGV dock levellers from 12 to 14 and the provision of 16 van loading level entry doors; the provision of an additional egress on the eastern boundary to facilitate vans exiting the site; sprinkler tank and associated underground pumps; repositioned ESB substation (15sq.m and 3m height); bin storage (42sq.m and 2.9m height); amended lighting layout; signage; modifications to hard and soft landscaping and boundary treatments; and associated site development works above and below ground.

Location: College Lane, Greenogue, Rathcoole, Co. Dublin
Applicant: Jordanstown Properties Limited
Reg. Ref: **SD21A/0200**

Recommendation: **Request further information**

Site Area

2.7 ha

Zoning

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

Main Concerns:

- 1) Impacts of the proposed development on existing trees and local biodiversity – A tree and hedgerow survey to include adjoining boundary has not been provided.
- 2) Potential impacts on bats (foraging routes)
- 3) Lack of SuDS (Sustainable Drainage System) shown for the proposed development
- 4) Visual impact of the proposed development. The development comprises a stark industrial building on the rural fringe. Minimization of visual impact is an important consideration in granting of permission.

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

DP 2016-22 Ch 7 Infrastructure & Environmental Quality (IE). Section 7.2.0 Surface Water & Groundwater

Policy 2 (IE 2) Surface Water & Groundwater

'It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

IE 2 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.**'*

IE 2 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.'

DP 2016-22 Section 8.1.0 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 5: To integrate Green Infrastructure as an essential component of all new developments.

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 the 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 etc. into existing areas of hard infrastructure wherever possible.

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

DP 2016-22 Section 8.3.0 Public Open Space Hierarchy 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.

DP 2016-22 Section 8.4.0 Sustainable Urban Drainage Systems

Sustainable Urban Drainage Systems (SUDS) drain surface water in an environmentally friendly way by replicating natural systems in managed environments. SUDS systems seek to collect, store and clean surface water using natural systems and to release it back into the environment in a slow and controlled way, thereby reducing the risk of fluvial and pluvial flooding. Key features, such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins are easy to manage, environmentally friendly and aesthetically attractive.

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

DP 2016-22 Section 9 Heritage Conservation and Landscapes

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. Tree Survey

The applicant shall submit and agree a comprehensive Tree Report with SDCC Public Realm Section. This shall comprise a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- i. Tree Survey Plan: all trees and hedges on and adjacent to the subject site shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- ii. Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
- iii. Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
- iv. Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate
- v. Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
- vi. Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.

- vii. Arboricultural Method Statement: clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.
- viii. Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- ix. Pre-Development Photo's: Prior to the commencement of works the applicant shall submit pictures of the existing trees/hedgerows before works commence with the tree protective fencing. This shall include a location map of where each picture was taken from.
- x. Arborist's name, arboricultural qualifications and contact details.
- xi. Date that the survey was carried out (surveys > 12 months are unacceptable).

FURTHER INFORMATION

2. Landscape and Visual Screening

- i. We require street trees to be provided along the northern boundary adjacent to the estate access road. Native and/or pollinator friendly tree species shall be provided at 10m intervals and be a minimum 20-25cmg at planting.
- ii. Street trees along the eastern boundary access road and within the car park shall also be a minimum 20-25cmg at planting.

The applicant is referred to the substantial landscaping requirements of the site immediately west (Ref. SD19A/0065). **FURTHER INFORMATION**

3. SuDS

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Natural SUDS features shall be incorporated into the proposed drainage system. The SUDS shall 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.

- i. The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS.
- ii. A comprehensive management plan shall be submitted and agreed in writing by SDCC Public Realm Section to demonstrate that the SUDS features have reduced the rate of run off into the existing surface water drainage.
- iii. A maintenance plan shall also be included as a demonstration of how the system will function following installation.
- iv. SuDS Features to be shown on the Landscape Proposals with details on how they work.

FURTHER INFORMATION

Fionnuala Collins
Assistant Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent