

## SOUTH DUBLIN COUNTY COUNCIL



### INTERNAL MEMORANDUM

Department: **Parks & Landscape Services / Public Realm** Date: **14/02/2022**

**Conor Doyle**  
**Planning Officer**  
**Planning Department**

**Development:** Change of use from haulage yard to filling station open to the public; additional diesel pumps; palisade fencing; illuminated and non-illuminated signage; all associated site and development works.

**Location:** David Nestor Freight Services, Crag Avenue Business Park, Clondalkin, D22

**Applicant:** EMO Oil Limited

**Reg. Ref:** SD21A/0149

**Recommendation:** **FURTHER SIGNIFICANT ADDITIONAL INFORMATION**

#### **Main concerns:**

1. **Lack of Green Infrastructure:** Under Item 7 of the request for additional information, the applicant was requested to submit proposals for the 'greening' of the site demonstrating compliance with policies and objectives outlined in Chapters 7 and 8 of the current County Development Plan. This has not been addressed.
2. **Lack of Sustainable Drainage Systems (SuDS).** Under Item 10 of the request for additional information, the applicant was requested to submit proposals that attenuate surface water using Sustainable Drainage Systems. This has not been addressed. SDCC do not approve of using underground tanks as part of SuDS schemes unless the full potential for the natural drainage features has been explored and shown to be not achievable.

## **Site Area**

0.22 ha

## **Zoning**

Objective A - To protect and/or improve Residential Amenity.

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

### **Chapter 7. Infrastructure and Environmental Policy. Section 7.2.0 Surface and 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.'*

#### **IE2 Objective 6:**

*To promote and support the retrofitting of Sustainable Urban Drainage Systems (SUDS) in established urban areas, including integrated constructed wetlands.*

## **Chapter 8. Green Infrastructure**

### **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.

### **Section 8.5.0 Green Infrastructure within Urban Areas**

**G6 Objective 1:** To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

#### **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.

**The Public Realm Section has assessed the proposed development in accordance with SDCC County Development Plan and best practice guidelines and recommends the following FURTHER SIGNIFICANT ADDITIONAL INFORMATION is requested:**

##### **1. Blue/Green Infrastructure/SuDS**

The current drainage scheme does not comply with the objectives of the County Development Plan in terms of Green Infrastructure or as regards the proper implementation of sustainable urban drainage and is contrary to Infrastructure and Environmental Quality Policy 2 Surface and Groundwater Objective 3, 5 and 6; Green Infrastructure Policy G2 - Green Infrastructure Network Objective G2 5 and G2 11, G5 -Sustainable Urban Drainage Systems, Objective G5 1 and G5 2 and other Green Infrastructure Objectives of the Development Plan.

The term **Green Infrastructure** is used to describe an interconnected network of waterways, wetlands, woodlands, wildlife habitats, greenways, parks and conservation lands, forests and other open spaces that adjoin and are threaded through urban areas. The Green Infrastructure network supports native plant and animal species and provides corridors for their movement, maintains natural ecological processes and biodiversity, sustains air and water quality and provides vital amenity and recreational spaces for communities, thereby contributing to the health and quality of life of residents and visitors to the County.

**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, SuDS Tree pit, rain gardens, filter strips, ponds, swales and basins are easy to manage, environmentally friendly and aesthetically attractive.

The proposed drainage system needs to be developed further in order to sustainably manage surface water through a more natural hydrological regime or SUDS scheme within the development. The philosophy of SUDS is an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and habitat/biodiversity enhancement. A SuDS strategy should be developed for the proposed development which takes account of and maximises these issues. SDCC do not approve of using underground tanks as part of SuDS schemes unless the full potential for the natural drainage features has been explored.

The applicant was requested in Item 7 and 10 of the additional information request to submit proposals for the 'greening' of the site and for surface water attenuation by means of SuDS; demonstrating compliance with policies and objectives outlined in Chapters 7 and 8 of the current County Development Plan. This should be done by way of:

- a) A fully detailed landscape plan with full works specification and a fully detailed planting plan that accords with the specifications and requirements of the Council's Public Realm Section.
- b) The Landscape Plan shall include hard and soft landscaping including natural SuDS features such as green roofs, swales, permeable paving, channel rills, grass areas, bioretention areas, rain gardens, SuDS Tree Pits, attenuation pond features/wetlands/reed beds etc.; levels; sections/elevations and details; detailed design of SUDs features. 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.
- c) Native trees to be incorporated into the landscape plan to break up the hard standing e.g. within or either end of the proposed car parking. Tree pits incorporate bioretention SuDS features. Trees size at planting to be a minimum of 18 to 20-cm girth.
- d) Proposed planting to be native and/or pollinator friendly (Refer All Ireland Pollinator Plan <https://pollinators.ie>).
- e) All SuDS proposals to be fully detailed in the Landscape Proposals/Plans.
- f) A detailed SUDS scheme for the proposed development to be agreed with Public Realm.

#### **FURTHER SIGNIFICANT ADDITIONAL INFORMATION**

##### **Summary**

The proposed development in its current configuration would materially contravene Green Infrastructure and Environmental policies G2 Objective G2 5 and G2 11 to G5 Objective G5 1 and 2 and IE 2 Objective 3, 5 and 6 of the County Development Plan.

The Public Realm Section is requesting that the applicant significantly alter the layout of the proposed development in order to ensure that:

- i) Green Infrastructure is integrated as a key component of the development and
- ii) The full natural potential of the site is explored to manage surface water runoff to maximise amenity and habitat/biodiversity enhancement, water quality treatment as well as providing attenuation of water quantity.

The Public Realm Section requires **further significant additional information** at a detailed level to ascertain whether the landscape proposals are in accordance with the County Development Plan and best practice guidelines.

---

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

---

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