

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm **Date:** 23/02/2022

Sarah Watson
Planning Officer
Planning Department

Development: Retention for 2 bay portal frame, additional floor area to existing industrial unit. Permission for roofing of 2 bay portal frame structure; extension to existing industrial unit; construction of a concrete resurfaced area in main yard; minor internal layout and elevational revisions to existing industrial unit and all associated site works including underground surface water attenuation and related utilities and works.

Location: Heiton Steel, Ashfield, Naas Road, Clondalkin, Dublin

Applicant: Chadwicks Group

Reg. Ref: SD21A/0229

Recommendation: **CLARIFICATION OF ADDITIONAL INFORMATION**

Main concerns:

1. Impact on existing trees, hedgerows and biodiversity

Under item 2 of the additional information request, the applicant was requested to provide details of any existing or proposed landscaping including landscape plans. This detail has not been provided. The impact on existing trees cannot be assessed unless the required information is submitted. Public Realm are concerned about the impact of the proposals on existing trees/vegetation on the site and boundary vegetation with the adjacent cemetery. For existing landscaping, a tree survey, arboricultural impact assessment and tree protection plan is required to include boundary vegetation within falling distance of the site.

2. Sustainable Drainage Systems (SuDS).

- i) We are concerned about the impact of the construction of the proposed swale on tree roots of existing trees on the site/site boundary. As outlined in 1 above a tree survey, arboricultural impact assessment and tree protection plan is required to include boundary vegetation within falling distance of the site.
- ii) It is best practice to have slopes at 1 in 4 but 1 in 3 as a maximum gradient is acceptable. The base width should be between 1m and 3m (Refer pg 113 of *SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'*.)
- iii) We are concerned about erosion control at the pipe inlet to the proposed swale to ensure its appropriate functioning.

Site Area

0.858 ha

Zoning

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

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.

DP 2016-22 Chapter 8. Green Infrastructure

Section 8.3.0 Public Open Space Hierarchy and Landscape Setting

It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.

G4 Objective 1: To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.

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 8.1.0 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 8.5.0 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.

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 Chapter 9 Heritage Conservation and Landscapes. Section 9.0 Natural Heritage Areas.

Section 9.3.4 Non Designated Areas

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 clarification of additional information is requested:

1. Tree Survey

Public Realm are concerned about the impact of the proposals on existing trees/vegetation on and immediately bounding the site, particularly the construction of a steep sided swale along the boundary with the trees in the adjacent cemetery. For existing landscaping, a detailed Tree Survey, Tree Constraints Plan, Arboricultural Impact Assessment and Tree Protection Plan is required to include boundary vegetation within falling distance of the site. This shall be carried out by an independent, qualified Arborist undertaken in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The tree report shall include all of the following:

- Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- 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.
- 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).
- 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

- 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.
- 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.
- 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.
- Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- 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.
- Arborist's name, arboricultural qualifications and contact details.
- Date that the survey was carried out (surveys > 12 months are unacceptable).

A tree bond may be required, based on the results of the survey.

CLARIFICATION OF ADDITIONAL INFORMATION

2. SUDS

The applicant should be requested to submit:

- i) A revised cross-sectional detail of the proposed swale showing gradient of side slopes, to be a maximum gradient of 1 in 3.
- ii) Detailed drawing showing the side inlet to the proposed swale showing erosion protection.

CLARIFICATION OF ADDITIONAL INFORMATION

Fionnuala Collins

Assistant Parks Superintendent

Endorsed By: Laurence Colleran

Senior Executive Parks Superintendent