

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

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

Date: **22/06/2022**

Conor Doyle
Area Planner
Planning Department

Development: 1 industrial storage building to the west of the main complex with an area of 465.3sq.m and a height of 8.8m; all associated site works and utility connections.

Location: Nangor House, New Nangor Road, Gallanstown, Co. Dublin, D12 F726

Applicant: Diageo Baileys Global Supply

Reg. Ref: **SD21A/0281**

Recommendation: **Clarification of Additional Information**

Site Area

12.28 ha

Zoning

Objective REGEN: To facilitate enterprise and/or residential led regeneration.

Main Concerns:

- 1) Impacts of the proposed development on existing trees and local biodiversity
- 2) Potential impacts on bats (foraging routes)

- 3) Lack of SuDS (Sustainable Drainage System) shown for the proposed development. There is space to provide these measures within the blue line (ownership) boundary. Only below ground measures using pipes and a tank are proposed which have no biodiversity and amenity benefits, an essential part of SuDS. SDCC do not approve of underground tanks unless the capacity of the site to attenuate water using above ground measures that mimic nature have been assessed. Attenuation shall be achieved by above ground natural methods rather than by underground tanks.

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. SuDS

The current drainage scheme does not fully comply with the objectives of the development plan in terms of the proper implementation of SUDS. There is space within the blue line (ownership) boundary to accommodate Suds. SDCC do not approve of underground tanks unless the capacity of the site to attenuate water using above ground measures that mimic nature have been assessed.

- a) Natural SUDS features shall be incorporated into the proposed drainage system. Attenuation shall be achieved by above ground natural methods rather than by tanks. 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.
- b) The applicant shall show SuDS features for the development such as green roofs, bioretention areas, tree pits, channel rills, swales, permeable paving, detention basin, wetland and other such SuDS and show what attenuation capacity is provided by such SuDS. SuDS features can be provided within the blue line boundary
- c) The detailed SUDS scheme for the proposed development to be agreed with Public Realm.

Clarification of Additional Information

Reason: In the interests of amenity, biodiversity, ecology, sustainable water management and sustainable development.

2. Blue/Green Infrastructure

We welcome the introduction of additional new tree planting along the the Grand Canal. Further landscaped features are required to accommodate sustainable drainage within the blue line boundary as outlined in 1 above. SuDS features to be detailed and shown on landscape plan.

- i) A landscape plan should be submitted for agreement with Public Realm, with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section.
- ii) Full planting details shall be provided within the landscape plans and shall focus on the creation of natural SuDS features to manage surface water using the landscape. The emphasis shall be on using native and pollinator friendly species. Planting and features can be provided within the blue line boundary.

Clarification of Additional Information

Reason: In the interests of amenity, biodiversity, ecology, sustainable water management and sustainable development.

3. Tree Protection

We welcome the repositioning of the building to avoid tree removal.

- i) All trees and hedgerows within the boundaries of the site shall be retained and maintained and will require protection during construction.
- ii) Prior to the commencement of development, the developer shall appoint a qualified landscape arborist as an arboricultural consultant for the entire period of construction.
- iii) The arborist shall submit photographs and confirmation that fencing for retained trees meets BS5837:2012 "Trees in Relation to Design, Demolition and Construction – Recommendations" for the written agreement of the Public Realm Section.
- iv) All works on retained trees shall comply with proper arboricultural techniques conforming to BS 3998:2010 Tree Work – Recommendations. The clearance of any vegetation including trees and scrub shall be carried out outside the bird-breeding season (1st day of March to the 31st day of August inclusive) or as stipulated under the Wildlife Acts 1976 and 2000.
- v) The arborist shall carry out a post construction tree survey and assessment on the condition of the retained trees. A completion certificate is to be signed off by the arborist

when all permitted development works are completed and in line with the recommendations of the tree report. The certificate shall be submitted to the planning authority for written agreement upon completion of the works.

Condition

Reason: To ensure the protection of trees to be retained on site in the interests of amenity, ecology, climate adaptation, proper planning and sustainable development.

4. Ecological Report

The applicant shall ensure that the mitigation measures recommended in the Ecological Report prepared by Dr. Niamh Roche are implemented in full.

Condition

Reason: In the interests of biodiversity, ecology and sustainable development.

Prepared By: Fionnuala Collins
Assistant Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent