

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Conor Doyle
Planning Officer

Development:

Construction of a single storey Discount Foodstore Supermarket with ancillary off-licence use (with mono-pitch roof and overall building height of c. 6.74 metres) measuring c. 2,207sq.m gross floor space with a net retail sales area of c. 1,410sq.m; Construction of a vehicular access point to Main Street Upper and associated works to carriageway and including partial removal of boundary wall / facade, modification of existing footpaths / public realm and associated and ancillary works including proposed entrance plaza area; Demolition of part of an existing rear / southern single storey residential extension (and related alterations to remaining structure) of Kelly Estates building; The original Kelly Estates building (a protected structure - Eircode: D22 Y9H7) will not be modified; Demolition of detached single storey accommodation/ residential structure and ancillary wall/ fence demolitions to rear of existing Kelly Estates building; Demolition of existing single storey (stable) building along Main Street and construction of single storey retail /cafe unit on an extended footprint measuring c. 118sq.m and associated alterations to existing Main Street boundary facade; Renovation and change of use of existing (vacant) two storey vernacular townhouse structure to Main Street, and single storey extension to rear, for retail/ commercial use (single level throughout) totalling c. 61sq.m; Repair and renewal of existing Western and Eastern burgage plot tree and hedgerow site boundaries; Provision of associated car parking, cycle parking (and staff cycle parking shelter),

pedestrian access routes and (ramp and stair) structures (to / through the southern and western site boundaries to facilitate connections to potential future development), free standing and building mounted signage, free standing trolley bay cover /enclosure, refrigeration and air conditioning plant and equipment, roof mounted solar panels, public lighting, hard and soft landscaping, boundary treatments and divisions, retaining wall structures, drainage infrastructure and connections to services/ utilities, electricity Substation and all other associated and ancillary development and works above and below ground level including within the curtilage of a protected structure.

Location: Main Street Upper, Newcastle, Co Dublin

Applicant: Lidl Ireland GmbH

Reg. Ref: **SD22A/0312**

Report Date: **15th Sept 2022**

Recommendation: **REFUSAL**

Site Area: 1.04 ha

Zoning: Objective VC – To protect, improve and provide for local Village Centres
Objective Res-N - To provide for new residential communities in accordance with approved Local Area Plans

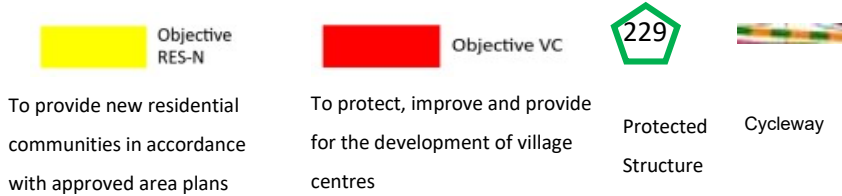
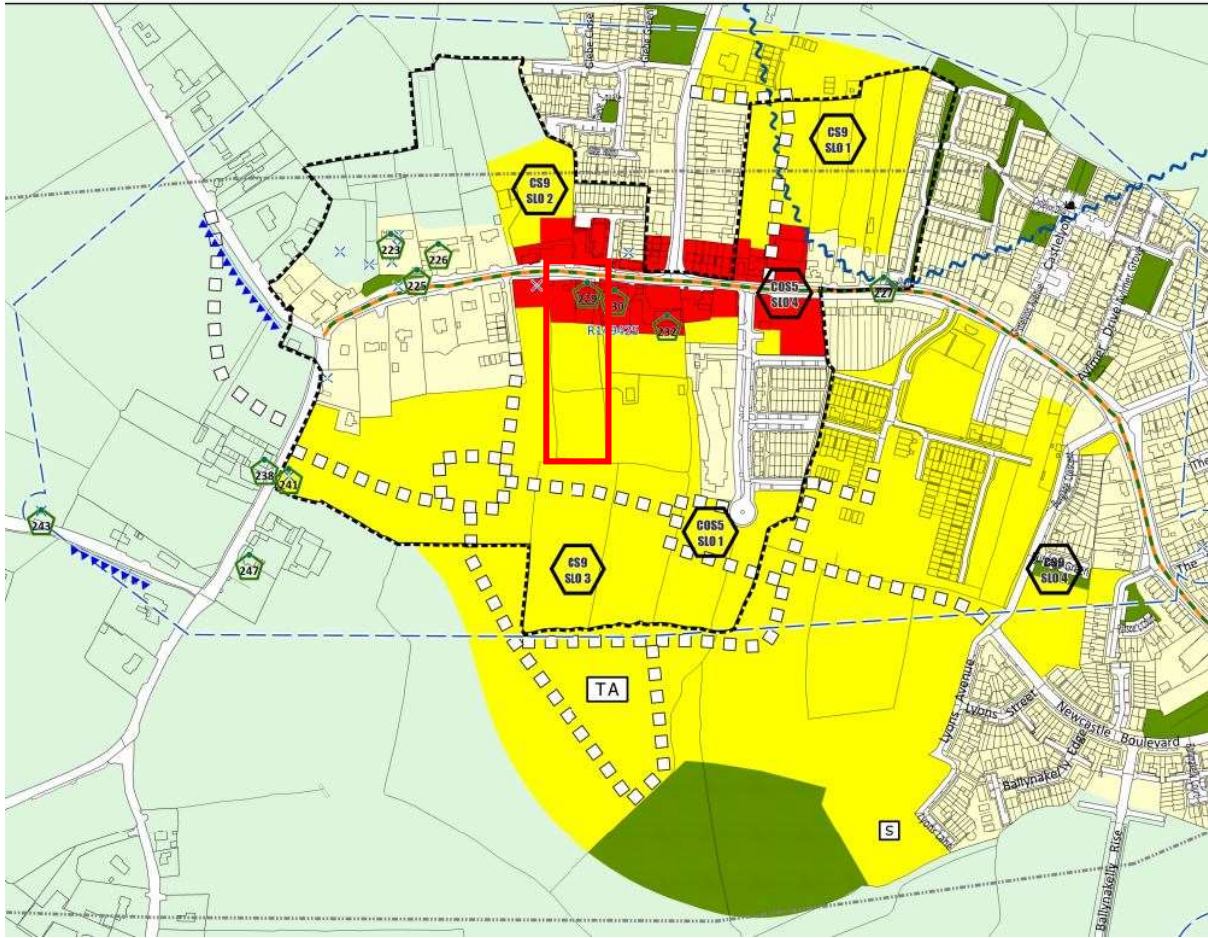
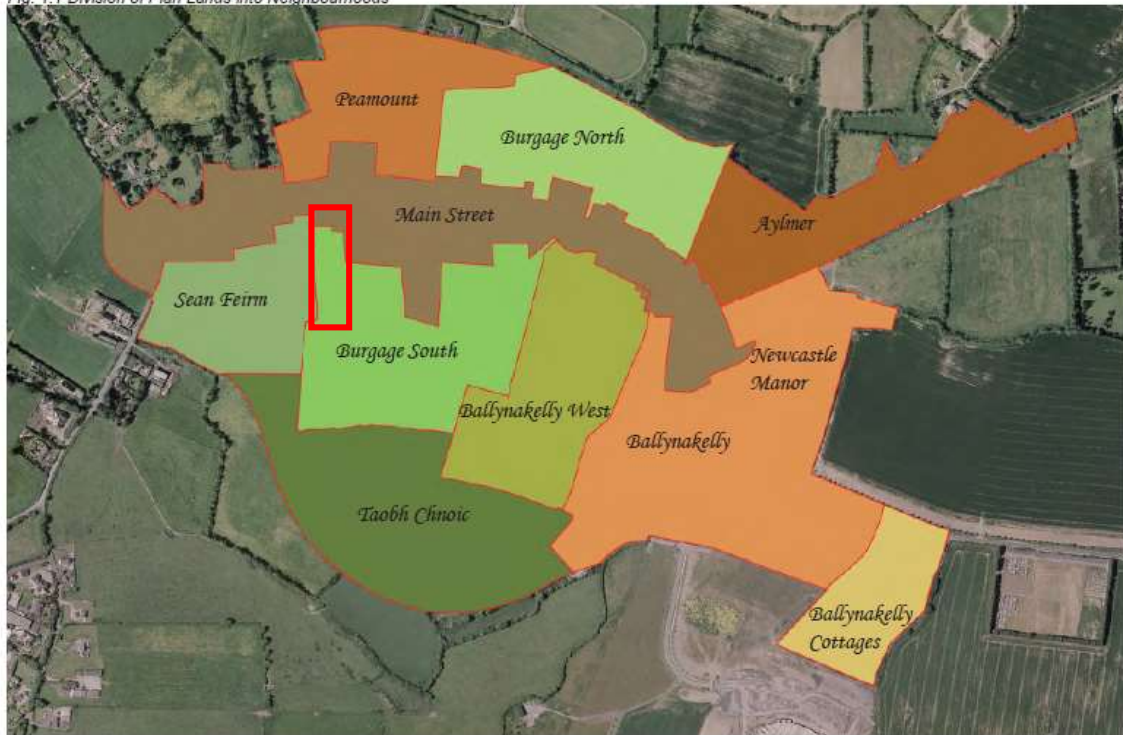


Figure 1 Extract from SDCC County Development Plan 2022-2028

Newcastle LAP Character Areas: Village Core and Village Expansion

Newcastle LAP Neighbourhood: Main Street West and Burgage South

Fig. 1.1 Division of Plan Lands into Neighbourhoods

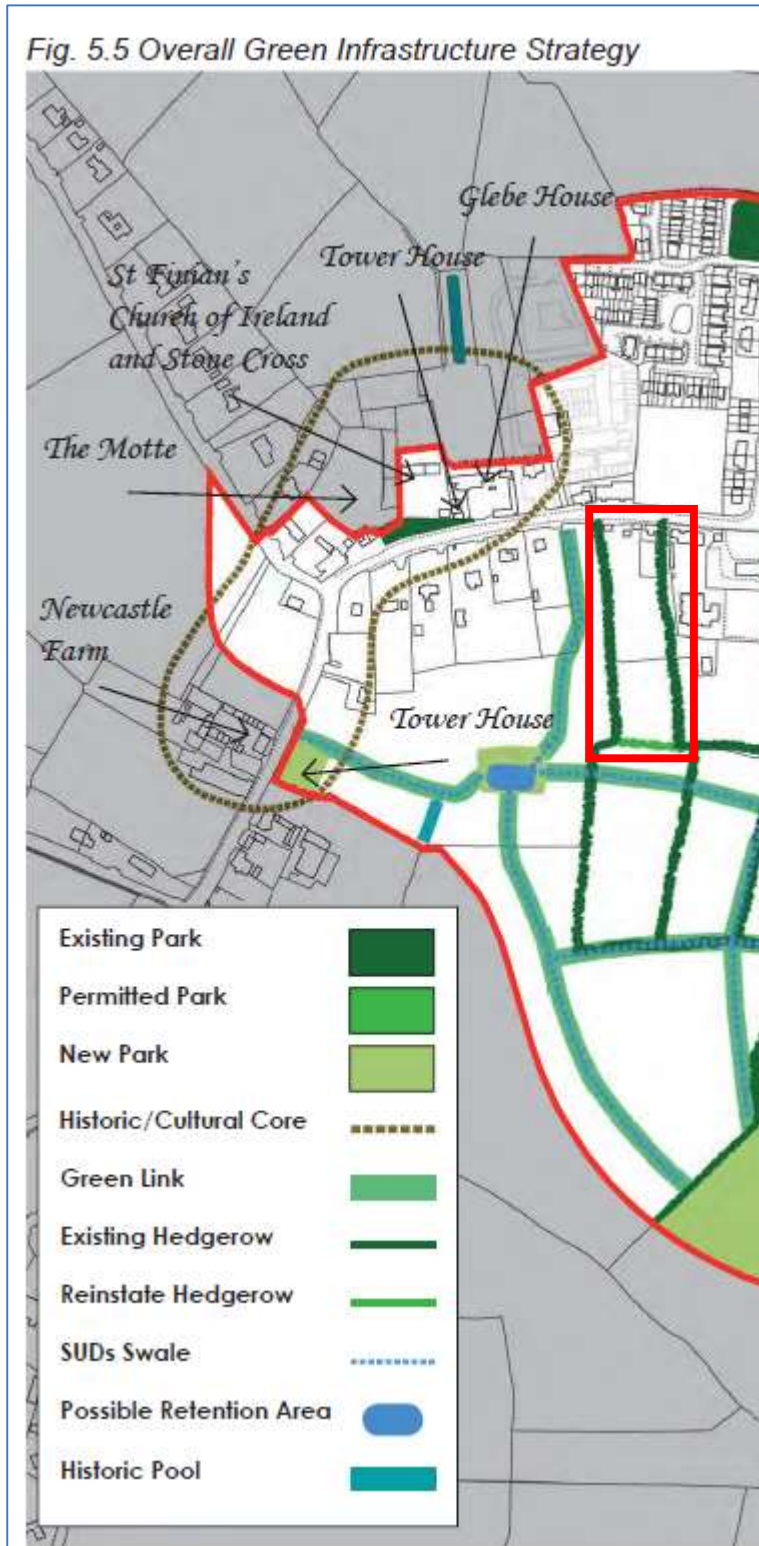


Main Concerns:

- 1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity.**
The development encroaches on burgage (heritage) hedgerow along the western boundary. At preplanning the applicant was advised by SDCC Water and Drainage to implement a 10m setback from the watercourse on the western boundary. A local spring and watercourse are to remain culverted, contrary to SDCC Policy for sustainable water management and habitat connection. The proposals remove sections of Burgage Hedgerow for future links, fragmenting Green Infrastructure.
- 2. Ecological Impacts, particularly on bat commuting and foraging routes**
Green infrastructure is used for foraging bats and requires protection and enhancement. The bat survey is incomplete and has not taken into account the presence of known bat roosts to the north of the site. Lighting design should be sensitive to presence of foraging and commuting bats. A comprehensive bat survey and an assessment of the lighting design by a suitably qualified bat expert is required.
- 3. Does not comply with SDCC GI Strategy**
A GI Strategy has not been provided showing GI on site and the local context. There are proposals to fragment Green Infrastructure by creating future links.
- 4. Green Space Factor not provided.** The applicant has not submitted any information in relation to the Green Space Factor. This is a requirement of the SDCC County Development Plan 2022-2028.
- 5. Does not comply with SDCC SuDS Guidelines and Sustainable Water Management Policy**
The proposed system is not SuDS compliant. The proposals are dominated by hard surfaces. The landscape has not been sufficiently used to manage surface water run-off close to source. SDCC advice is that *'underground tank systems should only be considered as a last resort'*. The

four pillars of SuDS: amenity, biodiversity, water treatment and attenuation have not been delivered, i.e. SuDS should be multifunctional.

In order to be compliant with the Newcastle Local Area Plan (2012) and the South Dublin County Council Development Plan (2022-2028) and the proposals need to comply with the following requirements:



Neighbourhood Area 1: Main Street (West) and Burgage South (Area 2) - Local Framework

Fig 6.4 Main Street (West) - Local Framework

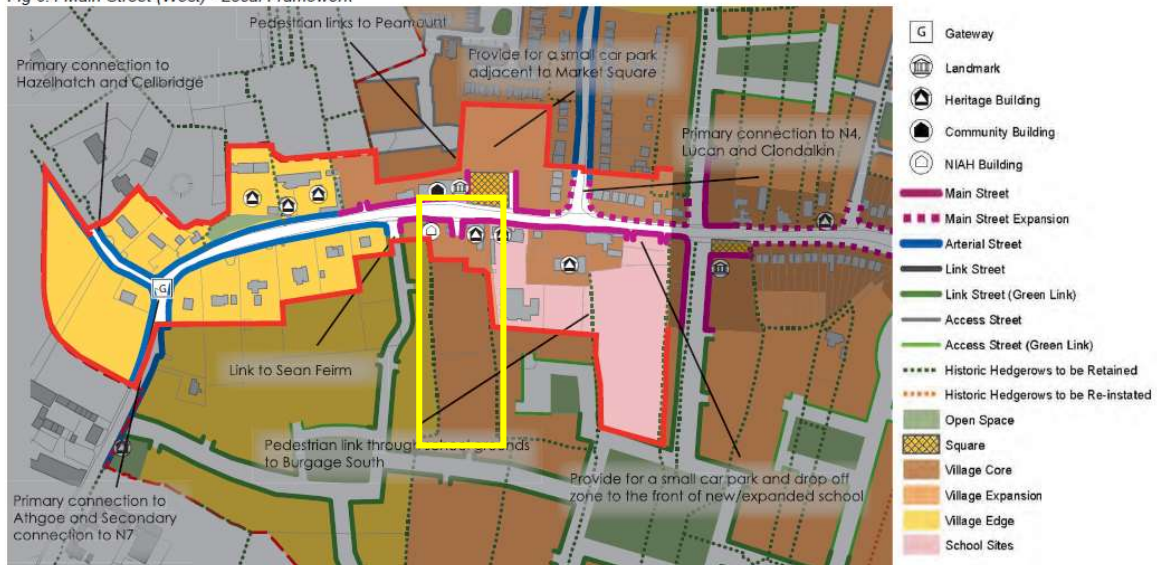


Fig. 6.5 Main Street (West) - Indicative Layout



Village Expansion

Objective LUD7 Development within the Village Expansion area shall be sensitively consolidated within the burgage plot field system in a manner that retains field boundaries and enhances and protects biodiversity. Where burgage boundaries have been removed previously, these shall be reinstated as part of any new development.

Policies/Objectives for Green Infrastructure

Retention, incorporation and Reinstatement of Burgage Plot Field System

Objective GI7 *Protect the historic burgage plot boundary and townland delineations (including townland boundaries to the Glebe, Ballynakelly Newcastle South and Commons Little) around Newcastle Village including their associated hedgerows and ditches.*

Objective GI8 *Require all planning applications for development on lands that include or are bound by burgage plot and/or townland hedgerow boundaries and ditches to clearly detail how these boundaries will be enhanced or reinstated and incorporated. All such applications shall include a comprehensive hedgerow survey and method statement (compiled by a suitably qualified person) for protection, incorporation and reinstatement of the historic boundaries before, during and after construction. This shall include for details on protecting any section(s) of hedgerow outside the application site that directly adjoin the application site.*

Objective GI9 *Require that burgage and townland field boundaries and ditches are utilised wherever possible as SUDS elements such as swales for conveying water; landscape features; and biodiversity-protecting elements.*

Objective GI10 *Allow for limited sections of field boundaries (burgage and townland) to be carefully altered where a need has been clearly demonstrated on the basis of a requirement for accessibility in terms of pedestrian and cyclist movement and the creation of successful streets and spaces. Where this occurs, high quality design cues that signal and delineate the pre-existing plot line of the section of removed hedgerow boundary shall be utilised such as a change in materials with the use of high-quality materials like cut stone and the use of lighting strips etc.*

Objective GI11 *Where removal of a section of hedgerow is required for street access, the street width and gap in the hedgerow shall be kept to a minimum and determined by street typology (see street design cross sections and typologies in Appendix 3) in order to protect and retain foraging routes for bats. Mature street planting should also be located to help fill the void between sections of hedgerow and create an 'eco hop' across each street as detailed in Section 7 of this Plan.*

Policies/Objectives Water, SUDS

Objective GI 12 *To promote the sustainable collection and on-site retention of surface water for delayed discharge to the local water system and for use as an on-site resource and as a means of creating a biodiversity network that will retain and develop existing flora and fauna.*

Objective GI 13 *That a linked SUDS network shall be implemented fully across the Plan Lands in accordance with national and regional SUDS requirements including the Greater Dublin Strategic Drainage Study Initiative and all proposed developments shall contribute to the achievement of this integrated network in order to reduce surface water run-off and to minimise the risk of flooding of the Plan Lands and surrounding lands. This shall include for a series of attenuation wetland areas in parklands that will collect surface water from the developed SUDS network prior to it feeding the stream system to the north of the Village.*

Objective GI 14 *That all development shall incorporate on site SUDS technologies detailed in the Standards Section (Section 7) of this Local Area Plan such as porous grass paviers, green roofs, rainwater recycling systems and soakaways.*

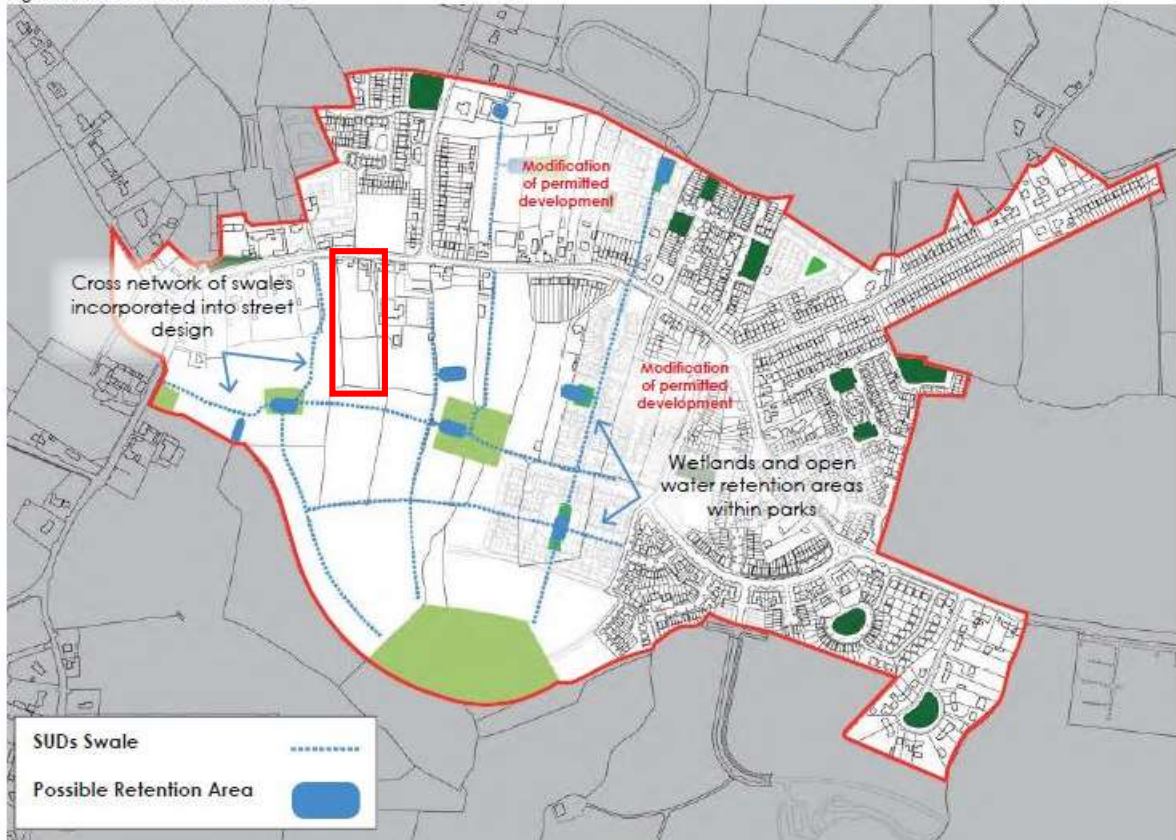
Objective GI 15 *That existing natural swales, ditches and hedges shall be retained to form an integral part of the overall SUDS network.*

Objective GI 16 *That SUDS elements such as swales, detention and retention basins and other landscape-based attenuation features be planted with suitable riparian vegetation and water tolerant*

tree planting that will clean and attenuate surface water flow. The planting of such species will be particularly required within parkland areas and along the east-west running SUDS elements in order to help intercept and direct waterflows.

Objective GI 17 That all swales utilised within the SUDS network shall be of an appropriate (shallow and wide) dimension to allow for ease of maintenance including mowing and shall be designed in the interest of health and safety where practical.

Fig. 5.4 Introduction of SUDS Network



Natural Heritage including Green Links

Objective GI27 Ensure that all extensive development proposals maximise the opportunities for enhancement of existing ecology and biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that includes measures to enhance ecology and biodiversity and avoid or minimise loss to local ecology and biodiversity.

Objective GI28 To require the submission of a Bat Survey as part of every planning application for development (excluding house extensions) within the Plan Lands and require the implementation of appropriate mitigation measures that ensure for the protection of bats and their habitats.

Objective GI29 To require the planting of mature native trees along both sides of streets located within the foraging and flight routes of bats in a manner that creates links between retained and augmented hedgerows and creates 'eco hop' opportunities across streets as detailed in Section 7 of this Plan.

Objective GI30 To encourage the planting of native species to reinforce the natural habitats of bats within Newcastle and its environs.

Objective GI31 *To create an open ended and integrated network of walking and cycle routes that promotes universal access for all and permeate the Plan Lands in a manner that coincides with biodiversity corridors and SUDS features. These routes shall form heritage trails that use natural and built heritage features to link a necklace of parks, open spaces and landscaped squares.*

Main Street West neighbourhood division of the Newcastle Local Area Plan lands

Objective MSW3 *Development along Main Street shall include for public realm improvements to include planting of indigenous trees, widening of footpaths and provision of robust street furniture.*

Objective MSW4 *A Main Street Improvement Plan should be agreed or produced as a separate advice document after adoption of this Local Area Plan to help guide and co-ordinate public realm improvements, infill development, redevelopment of sites and the achievement of universal access and universal mobility.*

Objective MSW5 *Development along Main Street shall include for relatively uniform traffic calming measures implemented at various locations along Main Street. These measures shall be in-keeping with the principles of place making and shall make use of urban design led methods such as on-street parking, narrowed carriageways, wide footpaths, cycle paths, street planting and furniture, shared surfaces, raised pedestrian crossings and raised traffic tables/junctions etc.*

Objective MSW6 *Development along Main Street shall allow and provide for connections to routes that are envisaged under the Accessibility Movement Strategy of this Plan including Link Streets, Access Streets and Green Links.*

Objective BS1 Burgage South neighbourhood division of the Newcastle Local Area Plan lands.

All planning applications for development within the Burgage South Neighbourhood shall clearly identify how burgage plot hedgerows and ditches to these boundaries will be enhanced and incorporated in a similar, but improved, model to the Castlelyon development, Aylmer Heath development and the development permitted under SD07A/0246. All such applications shall include a comprehensive hedgerow survey and method statement (compiled by a suitably qualified person) for protection, incorporation and reinstatement of the historic boundaries before, during and after construction. This shall include for details on protecting any sections of hedgerow outside the application site that directly adjoin the application site.

Objective BS2 *Burgage boundaries be utilised wherever necessary as SUDS elements in the form of swales for conveying water, landscape features and biodiversity-protecting elements. This shall include for the use of the burgage boundaries for the division of the planned neighbourhood park into a series of linked gardens with varying functions and SUDS features.*

Objective BS3 *The sensitive opening of limited sections of burgage boundaries is permissible where a need has been clearly demonstrated on the basis of a requirement for accessibility in terms of pedestrian and cyclist movement and the creation of successful streets and spaces. Where this occurs, high quality design cues that signal and delineate the pre-existing plot line of the section of removed*

hedgerow boundary shall be utilised such as a change in materials with the use of high quality materials like cut stone and the use of lighting strips etc.

Objective BS4 *Development of the Burgage South Neighbourhood shall include for a series of parks that incorporates existing burgage plot hedgerows and SUDS features. Each of these spaces shall fulfil a clear function. The larger neighbourhood park shall be divided by the hedgerows in a manner that creates a series of linked open spaces of varying character and active and passive functions including walking, cycling, children’s play, and informal sporting activities.*

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2022 - 2028:

CHAPTER 4 GREEN INFRASTRUCTURE

Policy G1 Overarching

GI1 Objective 1: *To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.*

GI1 Objective 2: *To implement and monitor the South Dublin County GI Strategy during the lifetime of this plan and develop a fit for purpose GI scoring for the County which will support ongoing identification, protection, enhancement and management of GI in the County and which will enable the assessment and monitoring of GI interventions in the County.*

GI1 Objective 3: *To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.*

GI1 Objective 4: *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.*

GI1 Objective 7: *To develop linked corridors of small urban ‘Miyawaki’ native mini-woodlands, a minimum of 100 sq m in size, to capture carbon and encourage biodiversity in suitable existing built-*

up areas, in low grade parkland, and other areas of zoned lands where deemed suitable and appropriate.

GI1 Objective 8: To increase over the lifetime of this plan the percentage of land in the County, including residential, managed for biodiversity including supporting the delivery of the objectives of the County Pollinator Plan and to continue to investigate the potential for the use of low-mow methods during the lifetime of the Plan.

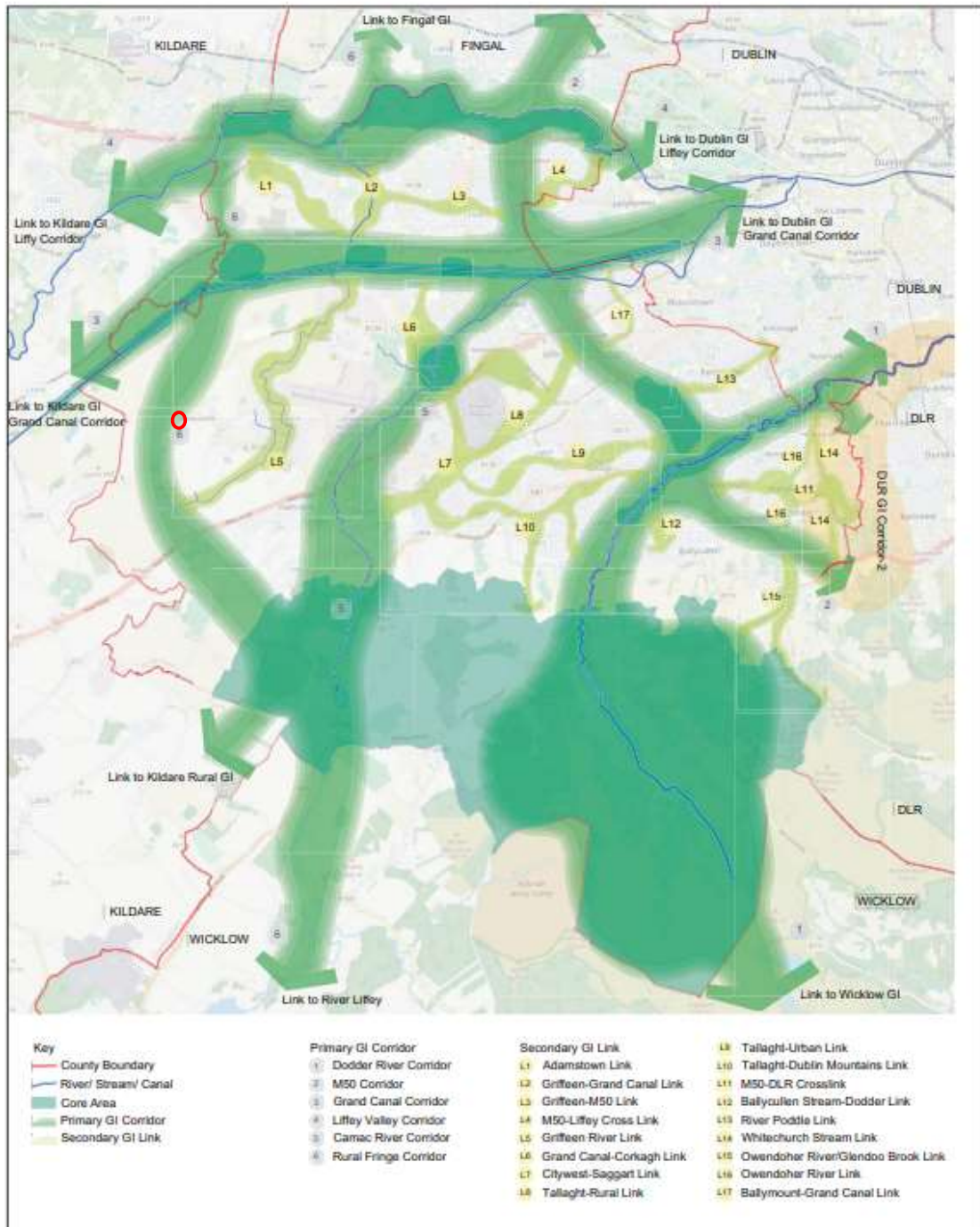


Figure 4.4: Green Infrastructure Strategy Map

Policy NCBH2 Biodiversity: *Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.*

NCBH5 Objective 1: *To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.*

NCBH5 Objective 2: *To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.*

Policy NCBH10: Invasive Species *Protect against and prevent the introduction and spread of invasive species within the County and require landowners and developers to adhere to best practice guidance in relation to the control of invasive species.*

NCBH10 Objective 1: *To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and / or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477 / 2011).*

NCBH11 Objective 3: To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.

NCBH11 Objective 4: To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries.

Policy GI2: Biodiversity

GI2 Objective 1: *To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.*

GI2 Objective 2: *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

GI2 Objective 3: *To retrospectively repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network through the implementation of new GI interventions.*

GI2 Objective 4: *To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.*

GI2 Objective 5: *To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.*

GI2 Objective 6: *To continue to support and expand the County Pollinator Plan through the management and monitoring of the County's pollinator protection sites as part of the Council's commitment to the provisions of the National Pollinator Plan 2021-2025.*

GI2 Objective 7: *To enhance the biodiversity value of publicly owned hard infrastructure areas by incorporating the planting of new trees, grasses and other species, thereby integrating this infrastructure into the overall GI network.*

GI2 Objective 8: *To take all possible steps to mitigate the impacts on biodiversity of increased recreation within the GI network, bearing in mind the effects of scramblers, dogs, drones, littering and illegal dumping.*

GI2 Objective 10: *To enhance biodiversity and the health of pollinator species by banning the use of glyphosphate in or close to public parks, public playgrounds, community gardens / allotments and within residential estates, whether by directly employed Local Authority staff or private contractors*

Policy GI3: Sustainable Water Management

GI3 Objective 1: *To ensure that hydromorphological assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan.*

GI3 Objective 2: *To require development proposals that are within riparian corridors to demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology.*

GI3 Objective 3: *To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any development site.*

GI3 Objective 4: *To uncover existing culverts where appropriate and in accordance with relevant river catchment proposals to restore the watercourse to acceptable ecological standards for biodiversity wherever possible improving habitat connection and strengthening the County's GI network.*

Policy GI4: Sustainable Drainage Systems

Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.

GI4 Objective 1: *To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.*

GI4 Objective 2: *To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.*

GI4 Objective 3: *To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.*

GI4 Objective 4: *To require that all SuDS measures are completed to a taking in charge standard.*

GI4 Objective 5: *To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network.*

GI4 Objective 6: *To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Drainage Systems (SuDS), including*

integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

GI5 Objective 4: *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).*

Policy GI5: Climate Resilience

GI5 Objective 2: *To protect and enhance the natural regime of the watercourses of the County to more efficiently capture their flood resilience value.*

GI5 Objective 3: *To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.*

GI5 Objective 4: *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).*

GI5 Objective 5: *To promote positive land and soil protection measures to avoid degradation or loss of natural soil resources, to minimise sealing of soils and to remediate contaminated land.*

GI5 Objective 6: *To provide more tree cover across the county, in particular to areas that are lacking trees, with an emphasis on planting native Irish trees as appropriate.*

GI5 Objective 7: *To require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDS strategy development.*

CHAPTER 12 IMPLEMENTATION AND MONITORING

12.4.3 RIPARIAN CORRIDORS:

The riparian corridors of the County include rivers, streams and other watercourses and are important for water quality as well as providing green infrastructure and biodiversity links, see

sections 4.2.2 and 11.3.1 for policy and objectives. Development within or affecting riparian corridors will be required to:

- *Ensure that hydromorphological assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan;*
- *Demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology;*
- *Promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any development site. This is a minimum and should be considered in light of the bullet points above;*
- *Uncover existing culverts where appropriate and in accordance with relevant river catchment proposals, restore the watercourse to acceptable ecological standards for biodiversity wherever possible, improving habitat connection and strengthening the County's GI network.*

For further relevant objectives refer SDCC County Development Plan 2022-2028

SDCC Living with Trees – Tree Management Policy 2021 – 2026

South Dublin County Council's Tree Management Policy 'Living with Trees' 2021-2026 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 and with the Councils Open Space Development and Taking in Charge.
- 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 *refusal* based on the main concerns outlined above. In the event that the Planning Authority are seeking additional information the following should be requested:

1. Arboricultural Impact of the Proposed Development

The development encroaches on burgage (heritage) hedgerow along the western boundary and proposed to remove sections for future links. A 10m setback from the watercourse is required on the western boundary. This 10m riparian zone should incorporate native hedgerow planting to enhance the existing heritage hedgerow. The proposals should be revised to eliminate the need to remove Burgage boundary hedgerow for future links.

ADDITIONAL INFORMATION

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

2. Sustainable Drainage Systems

SuDS have four pillars: attenuation, water quality treatment, amenity *and* biodiversity and these have not been adequately provided. The landscape is dominated by hard surfaces. SuDS features appear to be restricted to permeable tarmac in to parking bays on northern part of the site only and just three small rainwater gardens. Hardstand car parking areas have not been sufficiently broken up with planting such as trees incorporating SuDS bioretention. There are no SuDS Tree Pits. A petrol interceptor are proposed. The latter is considered by our SuDS guide to be a source of contamination and not recommended. The proposals are lacking in source control such as further bioretention, SuDS street trees, swales etc., that can be used for multifunctional benefit including attenuation. The existing ditch/watercourse along the western boundary identified in the ecological report should be investigated for use in sustainable drainage measures, as required by the Newcastle Local Area Plan. There are conflicts between the SuDS proposals shown on SDS Design Engineers Plan Ref 1025 PL.4 and the Austen Associates Landscape Plan Ref. 077622_LP_01.

An attenuation tank is proposed. SDCC do not approve of using underground tanks as part of SuDS schemes where the full natural potential of the site to manage surface water runoff has not been explored. The following additional information is requested:

- i. A SuDS proposal that complies with *SDCC SUDS Explanatory Design an Evaluation Guide, the Newcastle LAP and SDCC County Development Plan 2022-2028.*

- ii. The SuDS proposals should be a collaboration between landscape architect and the drainage engineer to integrate the SuDS into the landscape design proposals providing amenity, biodiversity, water quality treatment as well as quality and attenuation.
- iii. Plans showing existing and proposed flows.
- iv. Investigate the use of existing natural swales, ditches and hedges/burgage boundaries to be retained as part of the overall SuDS network to comply with objective GI15 of the County Development Plan and Objective BS2 of Newcastle Local Area Plan (*Burgage boundaries be utilised wherever necessary as SUDS elements in the form of swales for conveying water, landscape features and biodiversity-protecting elements.*)
- v. Details on how each SuDS component function as part of the overall treatment train.
- vi. Demonstrate the biodiversity, amenity, water quality and attenuation value of all SuDS features including proposals for integrating the existing ditch to the northwest.
- vii. Any proposed swales should be used for attenuation as well as conveyance of overland flow. They should also have an amenity and biodiversity value.
- viii. A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation.
- ix. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as SuDS Street Tree Pits, further swales, rain gardens, detention basins, filter drains, etc.
- x. Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage and landscape design for the proposed development.
- xi. A 10m setback from the top of the bank from the watercourse along the western boundary.
- xii. Proposals for daylighting the culverted watercourse and spring.

The applicant is recommended to contact the Public Realm and Water and Drainage Department to discuss.

ADDITIONAL INFORMATION

REASON: In the interest of amenity, biodiversity and water management; compliance with development Plan Policy, the provision, establishment and maintenance of a reasonable standard of landscape and proper planning and sustainable development of the area.

3. Green Space Factor (GSF)

The applicant has not submitted any information in relation to the Green Space Factor.

The quantity and quality of green infrastructure provided by new development will be improved by the implementation of a Green Space Factor (GSF) for South Dublin. The GSF is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area. This measurement comprises a ratio that compares the amount of green space to the amount of impermeable 'grey' space in a subject site. As a planning tool, this ratio is used to assess both the existing green cover within a site and the impact of new development, based on the quantity and quality of new green space provided. Greening factors have been adopted and implemented across the UK, Europe and the United States to help ensure that new development makes a positive contribution to the local environment. By ensuring that new development meets minimum standards for the provision of GI the GSF aims to secure a positive contribution to biodiversity, amenity, air quality, stormwater management, temperature regulation and other ecosystem services. The GSF prioritises the retention of existing GI features within a subject site, in order to support the protection of the County's existing GI network. At the same time, the GSF will ensure that new development incorporates new landscaping and GI features, contributing to the enhancement of the overall GI network. Chapter 12, section 12.4.2 provides further detail on the requirements for the GSF as part of planning applications.

REASON: To ensure that new development makes a positive contribution to the local environment with respect to biodiversity, amenity, air quality, stormwater management, temperature regulation and other ecosystem services.

4. Green Infrastructure

The submitted plans conflict with the County's Green Infrastructure Strategy. Please refer to Chapter 4 of the County Development Plan: [chapter-4-green-infrastructure.pdf \(sdcc.ie\)](http://sdcc.ie/chapter-4-green-infrastructure.pdf) The site lies close to the rural fringe primary green infrastructure corridor. In addition, a spring and watercourse are culverted beneath the site. Additional information is required to demonstrate how the plans contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission, having regard to the following:

- i. In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone;
- ii. Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands);
- iii. The characteristics and assets of the proximate GI Core, Corridor or SteppingStone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;
- iv. Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;

- v. Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;
- vi. Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.
- vii. All development proposals shall be accompanied by a Green Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:
- viii. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;
- ix. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
- x. Indicate how the development proposals link to and enhance the wider GI Network of the County;
- xi. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.
- xii. Submit proposals for daylighting the culverted spring and watercourse in accordance with SDCC Policy for sustainable water management and habitat connection.

ADDITIONAL INFORMATION

REASON: To reduce fragmentation, protect and enhance the biodiversity and ecological value of South Dublin County's Green Infrastructure network

5. Landscape Proposals

There are concerns with the lack of SuDS and integrated green infrastructure submitted in relation to the landscape scheme for the proposed development. The applicants landscape architect is requested to collaborate with the drainage engineer to integrate further above ground natural SuDS into the landscape design proposals i.e. that provide amenity, biodiversity, water quality treatment as well as quality and attenuation (multifunctional benefit). The applicant is requested to provide a revised and 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. The landscape proposals shall include:

- i. Full works specification, that accords with the specifications and requirements of the Council's Public Realm Section.
- ii. Hard and soft landscape details including levels, sections and elevations, detailed design of SUDs features such as further permeable paving, green roof(s), swales, further rain gardens and integrated tree pits; utilisation of burgage hedgerow boundary and plaza area.
- iii. Planting plan clearly setting out the following:

- a) Location of species types, schedule of plants noting species, planting sizes and proposed numbers/densities where appropriate
 - b) Implementation timetables.
 - c) Detailed proposals for the future maintenance/management of all landscaped areas
- iv. Details of boundary treatments (*Revise to eliminate the need to remove Burgage boundary hedgerow for future links*).
 - v. Planting and hardscape details for public open space to be detailed and agreed
 - vi. Details of tree planting pits to include SUDS bioretention features in urban trees pits
 - vii. Car parking shall be combined with regular tree planting and a high standard of kerbing and paving compliant with DMURS (2019). Street trees to be provided every 2 parallel or 5 perpendicular car park spaces to reduce the hard urban impact of the proposed development; for biodiversity; green infrastructure; air quality and sustainable water management.
 - viii. Detailed design of all other SUDS features such as swales, permeable paving, green roofs etc. Burgage boundaries to be utilised as SUDS elements in the form of swales for conveying water, landscape features and biodiversity-protecting elements.
 - ix. Details of Public Lighting and other underground services shall also be included on the landscape drawing to ensure that proposals are realistic, and planting is not precluded by the location of underground services and lighting and to ensure there is no conflict dark corridors for commuting bats.

REASON: In the interest of Amenity, compliance with Development Plan Policy, the provision, establishment and maintenance of a reasonable standard of landscape and proper planning and sustainable development of the area.

ADDITIONAL INFORMATION

Fionnuala Collins

Assistant Parks Superintendent

Laurence Colleran

Senior Executive Parks Superintendent

