

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm

Date: 11/11/2022

Planning Officer: Conor Doyle

Development: A new unmanned service station development consisting of construction of new petrol filling station forecourt with 4 dispensers, 2 underground fuel storage tanks with canopy structure (covering c. 235sq.m and 6.2m in height) with associated signage; Widen existing site entrance to the north-east of the site and creation of new egress location onto the Fonthill Road along the northern boundary to allow one-way internal road network incorporating new pedestrian crossing over existing footpath at site egress location; Automatic brush car wash and adjoining jet car wash with water recycling system; Single storey services building structure comprising of a car wash plant room and comms room area (gross floor area 16.3sq.m.) ; 4 electric charging bays, each comprising of a parking space and electric vehicle charging unit and associated signage; 3-room ESB substation to cater for EV charging infrastructure (gross floor area 38.3sq.m.); Air/Water services area with 2 car parking spaces; 2 internally illuminated double-sided totem signs, 1 at site entrance (4m high x 1.91m wide) with advertising area 15.3sq.m and 1 adjacent the new site egress location (5.8m high x 1.91m wide) with advertising area 22.16sq.m; All other associated underground and overground infrastructure, drainage, lighting, CCTV unmanned systems, landscaping and site development works.

Location: Fonthill Road, Liffey Valley, Clondalkin, Dublin 22

Applicant: Certas Energy Ireland Limited
Reg. Ref: SD22A/0363
Zoning: Objective MRC: To protect, improve and provide for the future development of a Major Retail Centre.
Area: 0.268 ha
Recommendation: **Additional Information**

Main Concerns:

1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity

The development lies adjacent to a tree belt along the eastern boundary of the site which is part of the M50 Primary Green Infrastructure Corridor. While the development proposes to retain these trees and install temporary tree protection fencing during construction the position of the trees does not appear to be accurately plotted and there is no tree survey.

2. Inadequate provision of green infrastructure and street trees

Without substantial greening, we do not consider this an appropriate development within a primary green infrastructure corridor. While there are proposals for native woodland planting mix, the current proposals do not appear to connect to the existing Green infrastructure/Tree Belt. At a minimum, protection and enhancement of existing green infrastructure is required. Street trees are lacking along the northern boundary. The drawings appear to show trees on the development site. Any trees impacted by the development should be surveyed.

3. 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 and there are no proposals to use the landscape to manage surface water run-off. SDCC advice is that '*underground tank systems should only be considered as a last resort*'.

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 GI Strategy

A GI Strategy has not been provided. SDCC require 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.

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 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.*

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.*

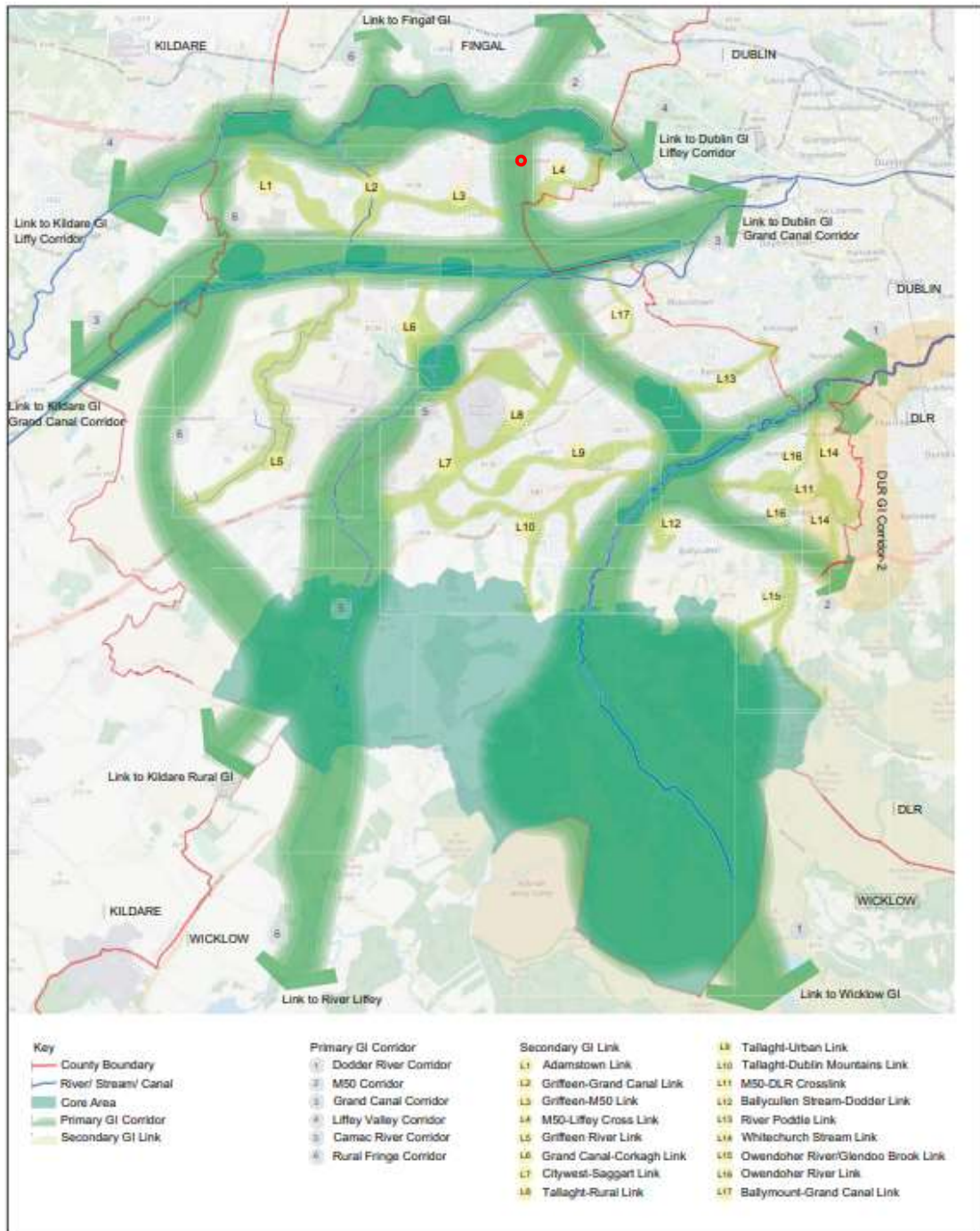


Figure 4.4: Green Infrastructure Strategy Map

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.*

I2 Objective 10: *To enhance biodiversity and the health of pollinator species by banning the use of glyphosate 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 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 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 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.*

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 County Development Plan and best practice guidelines and recommends the following additional information is sought:

1. Arboricultural Impact

There are concerns with the lack of information submitted in relation to existing trees and hedgerows within the site. The applicant is requested to submit detailed Tree Survey Report for the trees within and within falling distance of the proposed development area. This shall comprise a detailed Tree Survey, Arboricultural Impact Assessment and Tree Protection Plan 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. A tree bond may be required based on the results of the tree survey.

ADDITIONAL INFORMATION

Reason: To ensure the protection, safety, prudent retention and long-term viability of trees to be retained immediately adjacent to the site.

2. Sustainable Drainage Systems (SuDS)

The proposed drainage system is not acceptable and is contrary to SDCC County Development Plan objectives for sustainable drainage. The applicant is requested to revisit the design of the proposed development and submit revised plans and particulars to include:

- i) Above ground natural multifunctional (*amenity, biodiversity, water treatment/quality and attenuation*) SuDS such as green roofs, permeable pavement, bioretention areas, rain gardens, filter drains, swales, bioretention tree pits. Underground tanks should be avoided as they will only be considered as a last resort after the full extent of sustainable natural solutions have been explored.
- ii) Demonstrate the biodiversity value of SuDS - especially important given the site is in a Primary Green Corridor.

- iii) Existing and modified flows.
- iv) Detailed design of SUDs features showing how they work.
- v) A comprehensive SUDS management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage.
- vi) Landscape and drainage proposals to be consistent in SuDS proposals.

Refer SDCC *Sustainable Drainage Explanatory Design & Evaluation Guide 2022*.

ADDITIONAL INFORMATION

Reason: In the interests of amenity, climate adaptation, ecology and sustainable development in accordance with Sustainable Drainage and Green Infrastructure policies of SDCC County Development Plan (2022-2028).

3. Green Infrastructure Plan

All planning applications are required to demonstrate how they 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 (refer ***SDCC CDP 2022-2028 Section 12.4.2 Green Infrastructure and Development Management***). The applicant is requested to submit a plan that shows an overall approach to the delivery of landscape, green infrastructure and SuDS 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 Stepping Stone 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. The Green Infrastructure Plans shall include:
 - 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;
 - Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
 - Indicate how the development proposals link to and enhance the wider GI Network of the County;
 - Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.

ADDITIONAL INFORMATION

REASON: To reduce fragmentation, protect and enhance the biodiversity and ecological value of South Dublin County's Green Infrastructure network. 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 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. The Green Space Factor calculator and Guidance Note can be found online in the adopted plan related documents at <https://www.sdcc.ie/en/devplan2022/adopted-plan/related-documents>.

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.

5. Landscape Proposals

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The landscape proposals to be prepared by a suitably qualified landscape architect who shall liaise with the Drainage Engineer to deliver multifunctional SuDS, i.e. amenity, biodiversity, water treatment and attenuation.

- A. A Landscape Masterplan to scale of not less than 1:200 showing:
 - i. The species, variety, number, size and locations of all proposed planting
 - ii. Details of Hard landscape works, specifying surface material and furniture
 - iii. Details of additional natural SuDS features such as green roofs, bioretention rain gardens, swales, SuDS bioretention tree pits/linear trenches; showing how they work as part of an overall treatment train.
 - iv. Tree planting along the northern boundary. Trees to be a minimum 18-20cm girth, native and/or pollinator friendly species.
 - v. Levels, Detailed Cross Sections and Elevations

- B. Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting scheme.

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.

Fionnuala Collins

Assistant Parks Superintendent

Endorsed By: Laurence Colleran

Senior Executive Parks Superintendent