

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

PR/0545/21

Reg. Reference: SD21A/0051 **Application Date:** 03-Mar-2021

Submission Type: New Application **Registration Date:** 03-Mar-2021

Correspondence Name and Address: BMA Planning 128, Lower Baggot Street, Dublin 2

Proposed Development: The continuance of use of the existing 3 buildings and all associated external areas for storage and warehousing of motor vehicles, plant, machinery and other durable products for the sale by public auction, all associated ancillary uses including support staff and office facilities and all associated site and development works comprising hard and soft landscaping areas, roads and footpaths, car parking, boundary treatments/fencing, signage and water services infrastructure. The development described above was previously permitted under Reg. Ref. SD18A/0126 and the duration of the permission was limited to two years by condition 9 of that permission. A Protected Structure - Former Gun Powder Store (RPS Ref. 205) - is located within the application site.

Location: Wilsons Auctions, Green Isle Road, Corkagh, Clondalkin, Dublin 22

Applicant Name: RGR Holdings Limited

Application Type: Permission

(SW)

Description of Site and Surroundings:

Site Area: stated as 7.6 Hectares.

Site Description:

This site is located just north of the N7 (Naas Road) and immediately east of the interchange at the junction of the N7 and the R136 (Outer Ring Road). The site is accessed off the Green Isle Road, which is situated to the south and east of the site. The Camac Valley Tourist and Camping Park is located to the east of the site.

The existing internal access road runs through the middle of the site and divides the proposed sites into two individual areas. The eastern portion of the site comprises a natural greenfield (meadow), while the western portion of the site contains the three buildings (2 greenhouses and 1 main

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warehouse), a large open storage hardstanding gravelled area to the which currently stores trucks, plant and machinery, parking, and additional open storage yards. The 2 greenhouses are 2,034sq.m respectively, and the Main Warehouse is 2,037sq.m. To the side (east) of Greenhouse no. 2 is an open storage yard, and 33 car parking spaces to the front (south). The Camac River runs to the north of the site boundary and there is an important network of hedgerows and forested area to the north of the site, all of which are important biodiversity corridors.

The former Gun Powder Store, Protected Structure, is located to north. A group of Protected Structures, Kilmateed House (RPS 198), former Powder Mill (RPS 199) and Mill Pond (RPS204), are located to the north of the site behind a boundary of mature trees and separated by a small lake and accessed from the subject site, via a narrow laneway.

Proposal:

The applicant has submitted a planning application for the following:

- The **continuance** of use of the existing 3 buildings and **all associated external areas** for **storage and warehousing** of motor vehicles, plant, machinery and other durable products for the sale by public auction,
- all associated ancillary uses including **support staff and office facilities** and all associated site and development works comprising hard and soft landscaping areas, roads and footpaths, car parking, boundary treatments/ fencing, signage and water services infrastructure.
- The development described above was **previously permitted under Reg. Ref. SD18A/0126 and the duration of the permission was limited to two years** by condition 9 of that permission.
- A Protected Structure - Former Gun Powder Store (RPS Ref. 205) - is located within the application site.

Zoning:

The site is subject to zoning objective Open Space (OS) – ‘To preserve and provide for Open Space and Recreational Amenities.’ Notwithstanding the zoning of the site, the ‘Former Interbloem Premises’ has been identified as an SLO within the current County Development Plan:

Specific Local Objective

The site is identified in the County Development Plan 2016 – 2022 as follows:

Economic and Tourism (ET) Policy 3 SLO 2

‘To facilitate warehousing and ancillary auction uses at the Former Interbloem Premises, Corkagh off the Green Isle Road subject to proper planning and sustainable development including protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road, safeguarding the setting of Corkagh Park and its Protected Structures, and consideration of any potential impacts on the operation and safety of Casement Aerodrome.’

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Record of Protected Structure

There is a Protected Structure (RPS Ref. 2015, Gun Powder Store) located within the lands of the subject application site. The Protected Structure is associated with the former Corkagh Mills and Kilmateed House (RPS Ref. 187, 195, 196, 198, 199 and 204) which are located directly to the north of the application site.

Consultations:

Water Services Department – Water & Drainage Design - Additional information requested.

Heritage Officer – No report received at time of writing.

Architectural Conservation Officer - No report received at time of writing.

Irish Water - No objections, subject to conditions

Roads Section – No objections.

Environmental Health Officer - No report received at time of writing.

Transport Infrastructure Ireland – Object, additional information requested.

Department of Defence - No objections, subject to conditions

SEA Sensitivity Screening – Indicates overlap with:

- SFRA A 2016 and,
- SFRA B 2016

Submissions/Observations /Representations

None.

Relevant Planning History

SD18A/0126 Continuance of use of the 3 existing buildings and all associated external areas for storage and warehousing of motor vehicles, plant, machinery and other durable products for the sale by public auction, all associated ancillary uses and all associated site and development works.

Retention Permission Granted - Temporary.

SD07A/0203 The development will consist of the demolition of 3 number horticultural warehouses (6,369sq.m) and replacement with a tri location super hospital complex (219,800sq.m) with fully integrated education and research facilities based on international best practice encompassing a 12 number storey 450 bed children's hospital (135,00sq.m) building located to the west of the site, a 9 number storey 220 bed maternity hospital (30,800sq.m) building located to the north of the site and a 9 number storey 450 bed adult hospital (54,000sq.m) building located to the east of the site. The tri location super hospital complex will have in house diagnostic imaging and clinical waste handling. The site will also accommodate a 9-number storey 333 bed key worker accommodation block (20,000 sq.m) and provide ancillary retail (1500 sq.m) to service the hospital. Works will include providing a new priority junction and upgrading the existing access, 2450 number basement car parking spaces and 50 number surface car parking spaces, the development of two number heli -

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pads located on the roof of the children's and adult hospital, hard and soft landscaping areas, bicycle stands and revised boundary treatment. There is a protected structure (RPS 205, Gun Powder Store) located within the lands of the subject site. The protected structure is associated with the former Corkagh Gunpowder Mills (rps 195,196,198,199,203) to the North of the application area. The former Gunpowder Store will be protected and preserved in situ. **Refuse Outline Permission**

SD05A/1047 Retention of two no. glasshouse structures and one no. packing shed at positions located further south than indicated on proposals previously granted permission Reg. Ref. S95A/0409 together with retention of one free standing sign. **Retention Permission Granted.**

SD03A/0070 Construct two 38kV 12 metre line termination masts under the Clondalkin Saggart / Tee to Cheeverstown 38kV line. These masts are required, in order to underground a section of the 38kV Overhead Line which is in conflict with the Outer Ring Road / N7 Interchange Roadworks. **Permission Granted.**

S95A/0409 / PL06S.097747

Glasshouse development associated horticultural packing shed and sewage treatment.
Decision: **Planning permission granted on appeal** (ABP Ref. PL06S.097747)

Relevant Enforcement History

Enf Ref S7197

Nature of Enforcement: change of use of the lands to storage of vehicles/plant machinery and operation of an auction type business without planning permission.

Status: Closed

Pre-Planning Consultation

None.

Relevant Policy in South Dublin County Council Development Plan (2016-2022)

Section 1.12.0 Employment Lands

*3.13.0 Open Space Management & Use
Policy C12 Open Space*

*Section 4.2.0 Strategic Policy For Employment
Policy ET1 Economic and Tourism Overarching Policies and Objectives*

It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin County and in the Greater Dublin Area, whilst maintaining environmental quality.

*Section 4.3.3 Enterprise and Employment Zoned Lands
Policy ET3 Enterprise and Employment (EE)*

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It is the policy of the Council to support and facilitate enterprise and employment uses (hightech manufacturing, light industry, research and development, food science and associated uses) in business parks and industrial areas.

ET3 SLO 2:

To facilitate warehousing and ancillary auction uses at the Former Interbloem Premises, Corkagh off the Green Isle Road subject to proper planning and sustainable development including protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road, safeguarding the setting of Corkagh Park and its Protected Structures, and consideration of any potential impacts on the operation and safety of Casement Aerodrome.

Section 6.4.4 Car Parking

Policy TM7 Car Parking

Section 7.1.0 Water Supply & Wastewater

Policy IE1 Water & Wastewater

Section 7.2.0 Surface Water & Groundwater

Policy IE2 Surface Water & Groundwater

Section 7.3.0 Flood Risk Management

Policy IE3 Flood Risk

Section 7.5.1 Waste and Resource Policy and Legislation

Policy IE5 Waste Management

Section 7.6.0 Major Accidents Directive

Policy IE6 Major Accidents

7.7.0 Environmental Quality

Policy IE6 Environmental Quality

Section 8.0 Green Infrastructure

Policy G1 Overarching

Policy G2 Green Infrastructure Network

Policy G3 Water Courses Network

Policy G4 Public Open Space and Landscape Setting

Policy G5 Sustainable Urban Drainage Systems

Section 9.0 Heritage, Conservation and Landscapes

HCL Policy 1 – Overarching

HCL Policy 2 - Archaeological Heritage

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HCL Policy 3 - Protected Structures

HCL Policy 4 Architectural Conservation Areas

HCL Policy 5 - Older Buildings, Estates and Streetscapes

Section 9.3.1 Natura 2000 Sites

Policy HCL12 Natura 2000 Sites

Section 10.0 Energy

Policy E3 Energy Performance in Existing Buildings

Policy E4 Energy Performance in New Buildings

Policy E5 Waste Heat Recovery & Utilisation

Table 11.18: Key Principles for Development within Enterprise and Employment Zones

Section 11.2.5 Enterprise and Employment Areas

Section 11.2.7 Building Height

Section 11.4.1 Bicycle Parking Standards

Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards

Table 11.23: Maximum Parking Rates (Non Residential)

Section 11.4.4 Car Parking Design and Layout

Section 11.4.6 Travel Plans

11.5.1 – Archaeological Heritage

11.5.2 – Protected Structures

11.5.3 – Architectural Conservation Areas

Schedule 1 – Record of Monuments and Places

- RM & Map Ref: Address/Location & Description

Schedule 2 – Record of Protected Structures

- RPS & Map Ref, Address/Location & Description)

Section 11.6.1 (i) Flood Risk Assessment

Section 11.6.1 (ii) Surface Water

Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)

Section 11.6.1 (iv) Groundwater

Section 11.6.1 (v) Rainwater Harvesting

Section 11.6.1 (vi) Water Services

Section 11.6.3 Environmental Hazard Management

Section 11.6.3 (i) Air Quality

Section 11.6.3 (ii) Noise

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Section 11.6.3 (iii) Lighting

Section 11.6.4 Major Accidents – Seveso Sites

Section 11.6.5 Waste Management

Section 11.7.2 Energy Performance In New Buildings

Section 11.8.1 Environmental Impact Assessment

Section 11.8.2 Appropriate Assessment

Relevant Government Guidelines

Traffic and Transport Assessment Guidelines, National Roads Authority, (2007)

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009)

The Planning System and Flood Risk Management – Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009)

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

Assessment

The main issues for assessment are:

- zoning and Council policy,
- temporary permission,
- impact on protected structure,
- access and parking,
- external lighting
- landscaping and environmental impact, Green Infrastructure
- services and drainage and water quality protection,
- aviation safety,
- signage,
- environmental impact assessment
- appropriate assessment,

Zoning and Council Policy

Within Zoning Objective Open Space (OS), Warehousing as a use is not permitted as outlined in Table 11.15 of the County Development Plan 2016-2022. Notwithstanding this, a Specific Local Objective, within the Plan, supports the use of the '*former Interbloem Premises*' for '*warehousing and ancillary auction uses*'

ET Policy 3 SLO 2 states it is '*To facilitate warehousing and ancillary auction uses at the Former Interbloem Premises, Corkagh off the Green Isle Road subject to proper planning*

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and sustainable development including protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road, safeguarding the setting of Corkagh Park and its Protected Structures, and consideration of any potential impacts on the operation and safety of Casement Aerodrome.'

Under the previous application, the principle of support office and staff facilities was deemed to be an acceptable ancillary use.

SD18A/0126 found that, having regard to the nature of the activities onsite, it was considered that subject to restrictions on ancillary uses, and extensive encroachment of activities onsite by way of conditions, the warehousing and ancillary auction uses would be generally in compliance with the Council policy as expressed in the SLO.

It is noted that SD18A/0126 was granted as a temporary consent only, as concerns remained regarding the impacts of the proposal on the environment, the general zoning of the site (open space) and the road network.

The Planning Authority still has some concerns regarding the use on the site. The SLO allows 'ancillary auction uses' and it is not considered that the applicant has demonstrated that the auction element of the proposal is ancillary to the warehousing. In order to address this matter, the applicant is requested to provide details of the uses on the site, to include a revised site layout plan and detailed development report. The **additional information** provided should include, at the very least:

- details of where auctions occur throughout the 3-structures on the site (and the associated hard-standing areas immediately to the front and side of the structures)
- Areas used for warehousing/storage
- Areas used for both auctioneering and warehousing/storage
- Details of the days and times the auctions takes place; details should include concurrent auctions in different areas of the buildings and the actual number of auctions taking place each day
- any variance of use on days when the auction is taking place verse when there is no auction; details of operations on the site if, and when no auctions area taking place.
- it is noted that Covid legislation may have had an impact on the operations of the business and the applicant is requested to provide this information based on both the present time and operations outside of 'Covid'
- A labelled site layout plan to complement the above.

The primary zoning objective of the site is as Open Space and the SLO allows for a specific exception to this. It should also be noted that *ET Policy 3 SLO 2* includes the '*protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road, safeguarding the setting of Corkagh Park and its Protected Structures*'. Therefore, in order to comply with the overall zoning objective, **the applicant must demonstrate that the sensitive nature of the site has been taken into consideration.** These matters are assessed below.

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Areas of Hardstanding

The applicant has stated that they are seeking permission for the development previously granted under SD18A/0126. It is apparent that there may be areas of hardstanding on site that were not granted permission previously. The applicant is therefore requested to provide **additional information** showing all built areas/areas of hardstanding on the site, whether or not they have planning permission. It should be noted that the SLO refers to the former Interbloem premises and that any proposal for encroachment on lands which were not formally used as part of the 'premises' would not be considered favourably by the Planning Authority and could possibly be deemed to be contrary to the zoning of the lands.

Impact on Protected Structure

There is a Protected Structure (RPS Ref. 2015, Gun Powder Store) located directly to the north of the buildings and within the site boundary (Map no. Ref. 205 'Corkagh' Former Gun Powder Store). The Protected Structure is associated with the former Corkagh Mills and Kilmateed House (RPS Ref. 187, 195, 196, 198, 199, 204) which are located to the north of the application site. The access road to each of these protected structures crosses the lands of Wilson's Auctioneers. In this instance, in the interests of protecting the integrity of the context of these structures and the open space zoning that any permanent operation should be designed and landscaped to the highest standard.

No information has been submitted regarding protected structures with the current application, however, it is noted that for the previous permission (SD18A/0126), an Architectural Heritage Assessment was prepared by John Cronin and Associates (September 2018). Subject to conditions, it was determined that the impacts of the proposal would be acceptable. However, this assessment was based upon a temporary grant of permission and the proposed development would be permanent. As above, it is noted that the Protected Structures to the rear are accessed via the application site. It is therefore desirable, that the route is landscaped well, including, potentially a tree lined avenue (as a minimum). The hardstanding and areas where the storage of vehicles are located should be substantially screened by landscaping features such as berms, green walls, significant planting or other green alternatives.

The applicant is requested to demonstrate via **additional information** how the special character and appearance of the Protected Structures will be impacted/protected both directly and indirectly.

Visual Impact

The current site uses, notably the extensive external areas of storage of vehicles, plant and machinery has had a significant adverse impact on the site from a visual perspective.

It is noted that for SD18A/0126, the visual impact and landscaping were considered extensively. The applicant submitted additional information, including landscaping plans and bat surveys. Further information was also submitted as planning compliance. Given this proposal is for a

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permanent permission, the applicant is requested to demonstrate the full visual impact of the development to be granted, having regard to the open space zoning and protected structures (on site and in proximity), watercourses and ponds and provide a further detailed landscape proposal to address the Planning Authority's concerns. The applicant should be requested to submit a Landscape and Visual Impact Assessment, including photomontages, indicating the impact of the site at present and the impact following full implementation of the proposed landscaping. This should be provided as **additional information**.

Access and Parking

The Council's Roads Department has not raised any objections to the current proposal. Notwithstanding this Transport Infrastructure Ireland has raised a number of concerns and has stated:

The Authority has examined the above application and considers that it is at variance with official policy in relation to control of development on/affecting national roads, as outlined in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), as the proposed development by itself, or by the precedent which a grant of permission for it would set, would adversely affect the operation and safety of the national road network for the following reason(s):

- *Official policy in relation to development involving access to national roads and development along such roads is set out in the Department of Environment, Community & Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities (January, 2012)'. Section 2.7 of the DoECLG Guidelines concerns development at National Road Interchanges or Junctions. The proposal, if approved, would create an adverse impact on the national road and associated junction and would, in the Authority's opinion, be at variance with the foregoing national policy.*
- *The Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site.*
- *The Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site especially with regard to lighting and drainage'.*

As permanent permission is now being sought, the applicant is requested to address the concerns, raised by TII, through the submission of **additional information**.

Furthermore, as stated above, the site is zoned as Open Space and, whilst there is an SLO in place, the proposal should give consideration to the primary zoning objective. Paragraph 11.4.4 states, in relation to Parking Courts *"To ensure surface parking does not dominate the urban landscape parking courts, that are highly visible from the public domain, should be restricted in size (with no more than 40 spaces per court) and well landscaped. Where larger areas of surface parking are proposed they should be located behind buildings, and/or in the centre of blocks, so that they are obscured from view"*. It is not considered that the applicant has provided details of how this

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permanent parking area would be well landscaped and be in compliance with Section 11.4.4 of the County Development Plan. This should be addressed via **additional information**.

External Lighting

It is noted that condition 8 of SD18A/0126 required details of external lighting to be agreed. Having regard to the sensitivity of the site, the applicant is requested to submit details of all lighting proposals to allow for a full assessment to be carried out as part of the application for them to be agreed prior to a decision being made. This should be addressed via **additional information**.

Landscape and Environmental Impact

Parks has stated that all relevant conditions from SD18A/0126 should apply. They have also stated:

“The landscape architect’s opinion on compliance with planning permission should detail what elements of landscaping have not been carried out and ensure they are carried out. It appears, for example, from Photoview 2 that the formal hedge along the entrance avenue and deciduous trees along the west side of the avenue have not been planted so the trucks are highly visible behind a fence”.

Furthermore, given that permanent permission is being sought, the applicant should amend all proposals to ensure that the development complies with the Green Infrastructure Chapter of the County Development Plan and introduce increased features to include screening, green walls, berms, above ground surface water drainage and should investigate the potential for the rest of the site to be used by the public within this open space zoning. It is considered that this matter should be addressed via **additional information**.

Services and Drainage and Water Quality Protection

It is noted that water quality was addressed as part of the previous permission. Water services has stated:

“Based on limited information provided the surface water attenuation provided of 255m³ for 1:30 year is estimated to be undersized by 255%.

The surface water attenuation of 407m³ provided for 1 in 100 year storm is estimated to be undersized by approximately 60%.

Submit a report showing Met Eireann rainfall data for the proposed site. Show what the SAAR (Standard Annual Average Rainfall being used is. Submit a report showing updated surface water attenuation calculations. Show what surface water attenuation is provide and what surface water attenuation is required”.

The findings of the Water Services Department is of grave concern to the Planning Authority, especially considering the potential for flooding downstream from the site. **Additional information** should be requested regarding surface water attenuation and also regarding flood risk, and a full investigation of how the water can be held back on site for slow release – above ground solutions should form part of any proposals.

Irish Water has raised no objections, subject to conditions.

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Aviation Safety

The proposed site is located 2km to the south of Casement Aerodrome, Baldonnell. The Department of Defence has stated:

“Due to the proximity to Casement Aerodrome, mitigations may be required in relation to the management of wildlife attracted to the site. Should negative effects of bird activity on Irish Air Corps operations arise, the owner must put measures in place to mitigate these effects to an acceptable level”.

This matter should be addressed via condition.

Signage

Having regards to the permanency of the proposed development, all proposals for permanent signage should demonstrate high quality, with low lighting, and should consider the location of the site in proximity to an existing tourism facility, protected structures and the open space zoning of the site. The applicant is also requested by way of **additional information** to set out whether the signage differs from that which was previously granted permission on the site.

Previous Conditions attached to SD18A/0126

The applicant is requested to demonstrate how the proposed development meets the conditions attached to SD18A/0126. It is noted that compliance submissions have previously been made, however, this proposal represents a permanent proposal and the applicant is requested to demonstrate via **additional information**, how the following conditions have been complied with / incorporated into the proposed development:

- Condition 2 – amendments
- Condition 4 – protected structure
- Condition 5 – protection of the protected structure and the camac river
- Condition 6 – protection of the Kingswood Stream and Camac River
- Condition 7 – Parking restrictions
- Condition 8 – External Lighting
- Condition 10 – Landscape design and proposals rationale
- Condition 11 – Invasive Species
- Condition 13 – Inland Fisheries
- Condition 14 – Landscaping and Services
- Condition 15 - Trees

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Environmental Impact Assessment

No Environmental Impact Assessment Report (EIAR) was submitted with the application.

Having regard to the modest nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Appropriate Assessment Natura Impact Statement

A Screening for Appropriate Assessment prepared by Openfield ecological Services (2018) was submitted. It is not considered the impacts of the current proposal would alter the findings of this assessment. The screening process has indicated that no potential impact is likely, and that a full Stage 2 assessment is not required.

The planning authority consider that, having regard to the scale and nature of the development proposed and the distance from Natura sites, it is considered that the development would not be likely to have a significant effect individually or in combination with other plans or projects on a European site, therefore Stage 2 Appropriate Assessment is not required.

Notwithstanding the above, the proposed development of a site in immediate proximity to ecologically mature lands, in an established setting would result in the disturbance of habitat, and will have a significant impact, without mitigation on the medium-long term of the immediate environment. To lessen the impact of this disturbance the applicant should submit mitigating proposals within an ecological report and landscaping plan. Proposals and mitigating solutions should include the greening of all infrastructural elements of the design. This is in the interests of climate change and adaptation, which the Council must address.

Conclusion

Having regard to the information submitted, the planning history and the responses from consultees, additional information is required to comprehensively assess the application.

Recommendation

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. The Planning Authority has concerns regarding the principle of the use on the site. The SLO allows 'ancillary auction uses'. It is not considered that the applicant has demonstrated that the auction element of the proposal is ancillary to the warehousing. In order to address this matter, the applicant is requested to provide details of the uses on the site, to include a revised site layout plan and detailed development report. The additional information provided should include, at the very least:
 - (a)
 - (i) details of where auctions occur throughout the 3-structures on the site (and the associated hard-standing areas immediately to the front and side of the structures, if at all).

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- (ii) Areas used for warehousing/storage.
 - (iii) Areas used for both auctioneering and warehousing/storage.
 - (iv) Details of the days and times the auctions take place; details should include concurrent auctions in different areas of the buildings and the actual number of auctions taking place each day.
 - (v) any variance of use on days when the auction is taking place verse when there is no auction; details of the operations carried out on the site if, and when, no auctions are taking place.
 - (vi) it is noted that Covid legislation may have had an impact on the operations of the business and the applicant is requested to provide this information based on both the present time and operations outside of 'Covid'.
 - (vii) A labelled site layout plan and development/operational report to complement the above.
- (b) An additional site layout plan is requested, that shows all built areas/areas of hardstanding on the site, which clearly indicates whether or not these areas have planning permission.
2. (a) Transport Infrastructure Ireland (TII) is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site. The applicant is requested to provide information to address this concern.
- (b) TII is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site especially with regard to lighting and drainage. The applicant is requested to provide information to address this concern.
3. Given this proposal is for a permanent permission, the applicant is requested to demonstrate the full visual impact of the development, having regard to the open space zoning, the protected structures (on site and in proximity), watercourses and ponds and the tourism facility adjacent.
- The applicant is requested to submit:
- (i) A revised and detailed landscape proposal to address the Planning Authority's concerns.
 - (ii) A Landscape and Visual Impact Assessment, including photomontages, indicating the impact of the site at present and the impact following full implementation of the proposed landscaping.
 - (iii) Revised proposals, including a landscaping scheme, for the access roadway (which leads to the Protected Structures to the north) demonstrating how the operations on the site shall be substantially screened by landscaping features such as berms, green walls, significant planting or other green alternatives.
 - (iv) Report and plans demonstrating clearly how the special character and appearance of the Protected Structures will be impacted / protected both directly and indirectly.

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- (v) Details for the landscaping of all parking areas and demonstrate clearly how this is in compliance with Section 11.4.4 of the County Development Plan.
- (vi) Boundary treatments (including elevational drawings). Please note that the northern boundary treatment, in close proximity to the onsite Protected Structure shall be sensitive and predominately planted (i.e. not structural).
- (vii) The applicant is requested to set out what elements of landscaping have not been carried out in association with SD18A/0126. Where elements are not in place, the applicant is requested to provide a timeframe for implementation. If they are superseded by the requirements of items i-v above please state.
4. The applicant is requested to:
- (a) to demonstrate how the special character and appearance of the Protected Structures will be impacted/protected both directly and indirectly.
 - (b) provide a landscaping scheme, which sets out how the access to the Protected Structures would be improved.
5. Having regards to the location of the site in proximity to an existing tourism facility, at the entrance to an accessway to a grouping of protected structures and the open space zoning of the site, the applicant is requested to submit additional green infrastructure proposals to help mitigate and compensate for the impact of the proposed development on this site. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the Bat population in the area. Response should include drawings.
6. The applicant should note that based on the limited information provided, the surface water attenuation provided of 255m³ for 1:30 year is estimated to be undersized by approximately 255%. The surface water attenuation of 407m³ provided for 1 in 100 year storm is estimated to be undersized by approximately 60%. Both of which are considered to be unacceptable and contrary to the provisions of the County Development Plan. The applicant is requested to submit the following:
- (a) A report showing Met Eireann rainfall data for the proposed site. This should show what the SAAR (Standard Annual Average Rainfall) being used is.
 - (b) A report showing updated surface water attenuation calculations. This shall show what surface water attenuation is provided and what surface water attenuation is required.
 - (c) A report and revised plan/proposals showing what SuDS (Sustainable Drainage System) are proposed for the development.
 - (d) A revised surface water/SUDS plan and method statement that introduces significant SUDS elements to the overall design, which should include the greening of all infrastructure on the site. Please note that over-engineered solutions will not be looked upon favourably and that SUDS features such as tree pits, green area detention basins, swales, green roofs, permeable paving rain gardens, channel rills and other such SuDS should be included within the revised proposals.
 - (e) The applicant shall show what the surface water attenuation capacity in m³ is for such SuDS.

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(f) The applicant shall submit a revised drawing showing what surface water attenuation is proposed for the development. Include SuDS in surface water attenuation provided. Show what the capacity is for each surface water attenuation system is for the site.

(g) When showing surface water layout of development, the applicant shall use the colour coding of the Greater Dublin Strategic Drainage Study for showing surface water network on drawing.

(h) A report to show what, if any, flood risk there is for proposed development (both on the site and downstream from the site).

7. Having regards to the permanency of the proposed development, all proposals for permanent signage on the site should demonstrate the use of high-quality materials and a high-quality design with, sensitive low lighting. Significant consideration should be given to the location of the site in proximity to an existing tourism facility, at the entrance to an accessway to a grouping of protected structures and the open space zoning of the site.

The applicant is requested therefore to submit:

(i) Revised (and full) proposals for all signage on the site taking cognisance of the above.

(ii) Details whether the signage differs from that which was previously granted permission on the site.

8. The applicant is requested to demonstrate how the proposed development meets the conditions attached to SD18A/0126. It is noted that compliance submissions have previously been made, however, this proposal represents a permanent proposal and the applicant is requested to demonstrate how the following conditions have been complied with/incorporated into the proposed development:

- Condition 2 – amendments
- Condition 4 – protected structure
- Condition 5 – protection of the protected structure and the camac river
- Condition 6 – protection of the Kingswood Stream and Camac River
- Condition 7 – Parking restrictions
- Condition 8 – External Lighting
- Condition 10 – Landscape design and proposals rationale
- Condition 11 – Invasive Species
- Condition 13 – Inland Fisheries
- Condition 14 – Landscaping and Services
- Condition 15 - Trees

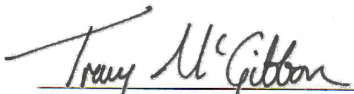
Where relevant, the information should be shown on layout plans/elevations.

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REG. REF. SD21A/0051

LOCATION: Wilsons Auctions, Green Isle Road, Corkagh, Clondalkin, Dublin 22

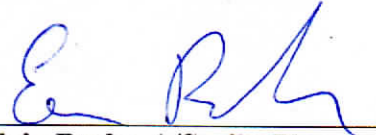


**Tracy McGibbon,
A/Senior Executive Planner**

ORDER: I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Date:

27/4/21



Eoin Burke, A/Senior Planner