

# Comhairle Chontae Atha Cliath Theas

**PR/1088/21**

## Record of Executive Business and Chief Executive's Order

**Reg. Reference:** SD21A/0162      **Application Date:** 22-Jun-2021  
**Submission Type:** New Application      **Registration Date:** 22-Jun-2021

**Correspondence Name and Address:** Sadhbh O'Connor, Thornton O'Connor Town Planning 1, Kilmacud Road Upper, Dundrum, Dublin 14

**Proposed Development:** Construction of 2 warehouses with ancillary office and staff facilities and associated development; Unit 1 will have a maximum height of 16.35 metres with a gross floor area of 8,156sq.m including a warehouse area (7,397sq.m), ancillary office areas (362sq.m) and staff facilities (397sq.m); Unit 2 will have a maximum height of 15.35 metres with a gross floor area of 5,990sq.m including a warehouse area (5,031sq.m), ancillary office areas (536sq.m) and staff facilities (423sq.m); vehicular access/egress routes to the subject site via the existing roundabout and access road; alteration to the existing access arrangements to the subject lands to facilitate safe traffic flow to/from the proposed facilities; pedestrian access; 109 car parking spaces; bicycle parking; HGV Parking; HGV yards; level access goods doors; dock levellers; access gates; signage; hard and soft landscaping; lighting; boundary treatments; ESB substation; sprinkler tanks; pump houses; and all associated site development works above and below ground on lands bounded to the south by the N7 Naas Road, to the north and west by the National Distribution Centre and to the east by Brownsbarn Drive and the Royal Garter Stables, a Protected Structure (RPS Ref. 261).

**Location:** Brownsbarn, Citywest Campus, Dublin 24.

**Applicant Name:** Exeter Ireland IV B Limited

**Application Type:** Permission

### **Description of Site and Surroundings**

Site Area: stated as 4.04 Hectares on the application.

Site Visit: 23rd of July 2021

### **Site Description**

The subject site is located to the north of N7 and is bounded to the north and west by the National Vehicle Distribution Centre and to the east by Brownsbarn Drive and the Royal Garter Stables, a

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Protected Structure (RPS Ref. 261). The Royal Garter Stables currently has permission to operate as a speciality bicycle retail store. The subject site is currently vacant and is grassed with established vegetation across the site, particularly on the western and northern boundary. A watercourse, identified as a Camac tributary, runs along the western boundary and is heavily vegetated. The ground is largely uneven and drops down from Brownsbarn Drive towards the western boundary.

### Proposal

Permission is being sought for the following works:

- The development will comprise of the construction of 2 warehouses with ancillary office and staff facilities and associated development:
  - Unit 1 will have a maximum height of 16.35 metres with a gross floor area of 8,156sq.m including a warehouse area (7,397sq.m), ancillary office areas (362sq.m) and staff facilities (397sq.m);
  - Unit 2 will have a maximum height of 15.35 metres with a gross floor area of 5,990sq.m including a warehouse area (5,031sq.m), ancillary office areas (536sq.m) and staff facilities (423sq.m);
- The development will also include:
  - vehicular access/egress routes to the subject site via the existing roundabout and access road;
  - alteration to the existing access arrangements to the subject lands to facilitate safe traffic flow to/from the proposed facilities;
  - pedestrian access;
  - 109 car parking spaces;
  - bicycle parking;
  - HGV Parking;
  - HGV yards;
  - level access goods doors; dock levellers; access gates;
  - signage;
  - hard and soft landscaping; lighting; boundary treatments;
  - ESB substation; sprinkler tanks; pump houses; and
  - all associated site development works above and below ground.

### Zoning

The subject site is subject to Zoning Objective 'EE': 'To provide for enterprise and employment related uses'.

There is a Road Proposals – 6 Year designation to the north of the subject site (not within the site).

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### Consultations

Department of Defence (Baldonnell Aerodrome) – observations provided.

Fire Officer – no report received.

H.S.E. Environmental Health Officer – no objections.

Irish Water – further information requested.

The Eastern and Midland Regional Assembly – no report received.

Transport Infrastructure Ireland – observations provided.

Architectural Conservation – no report received.

Heritage – further information requested.

Public Realm – further information requested.

Pollution Control – no report received.

Public Lighting – no report received.

Roads – no objections.

Water Services – no objections.

SEA Sensitivity Screening – Overlap indicated with the Strategic Flood Risk Assessment (SFRA) B flood risk layer. The site also adjoins the site of Protected Structure RPS No. 261 Royal Garter Stables.

### Submissions/Observations /Representations

The Department of Defence and Transport Infrastructure Ireland provided responses to the proposed development. These have been addressed in the assessment section of this report.

### Relevant Planning History

#### *Subject site*

S00A/0602

Revised layout and location of ESB sub-station/refuse area/air handling plant/service enclosures, car parking and associated site development works with access from new interchange on Naas Road at Site 3034/3044, on previously approved permission Register Ref. S00A/0059. **Permission granted.**

SD10A/0010 & ABP Ref. PL06S.236426

Single storey "McDonalds" fast food restaurant (300sq.m.) with drive-through facility and including all associated site development and infrastructural works, road realignment works, landscaping service plant and surface car parking on a site of 0.49 ha. The application also includes for 1 no. Totem sign (internally illuminated), 6 no. internally illuminated signs and 2 no. speaker boxes. **Permission refused by SDCC and An Bord Pleanala. The proposal was refused by ABP for two reasons, firstly, having regard to the zoning objective of the site it was considered that the**

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proposed development, by reason of the generation of non-industrial related traffic movements would contribute to the diminution of the traffic carrying capacity of a national route, would lead to the premature and unacceptable reduction in the level of service available to road users and reduce the benefit from the substantial investment made in the national road network. Secondly, having regard to the nature and scale of the development and associated advertising signs it was considered that it would adversely affect the setting of the protected structure the Royal Garter Stables.

#### *Adjacent and surrounding sites*

##### Petrol Station and Distributor Roads

SD03A/0084 & ABP Ref. PL06S.204371

Construct a new Petrol Service Station consisting of a new single storey retail shop building, new A.T.M. facility, new forecourt, new underground tank farm, new illuminated canopy, new car wash facility, new trash compound & new tech room, new service bay, new illuminated signage and ancillary works. **Permission granted by ABP.**

SD02A/0377

Site development works consisting of distributor roads from the existing roundabout at the Citywest Interchange and serving the site, surface water, sewers, attenuation pond, diversion of foul sewer, construction of a section of the Boherboy Watermain and other services and to construct filling to raise existing ground levels on lands zoned to provide for industrial and related uses. **Permission granted.**

##### Protected Structure Royal Garter Stables

SD17A/0324

The refurbishment of 279.4sq.m of existing derelict outbuildings at ground and first floor level for use of the refurbished areas of the outbuildings as a speciality bicycle retail store subsequent to the change of use, Planning Reference SD17A/0131, including the removal of existing asbestos roof, replacement roof structure and finishes and modifications to the existing façade including the insertion of new windows/doors. Permission for use of the refurbished areas of the outbuildings as a speciality bicycle retail store subsequent to the change of use, Planning Reference SD17A/0131.

**Permission granted.**

SD17A/0131

Change of use from restaurant and public house to use as a speciality bicycle retail store with associated ancillary uses to include repair/servicing workshops, custom fitting facilities and staff and customer facilities, comprising ground floor area of 699.6sq.m and a first floor area of

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568.9sq.m. It is to be noted that the current structure on site, which comprises Brownsbarn Bar and Restaurant, is identified as Protected Structure, RPS Ref. 261. **Permission granted.**

### Vehicle storage to west and north of subject site

SD17A/0220 & ABP Ref. PL06S.301182

1.512ha area of gravel surfacing to provide outdoor, uncovered vehicle storage for up to 1,878 vehicles. **Permission granted by SDCC. First party appeal to ABP in regard to conditions. ABP decided to attach and remove conditions.**

SD05A/0442 & ABP Ref. PL06S.215245

Site development works to provide storage of motor vehicles (cars & trucks) to include fencing, landscaping / mounds, surfacing, drainage, security hut, lighting masts, CCTV masts. **Permission granted by SDCC. First party appeal to ABP in regard to contributions. ABP decided to attach conditions.**

### Relevant Enforcement History

None recorded for subject site according to APAS.

### Pre-Planning Consultation

None recorded for subject site according to APAS.

### Relevant Policy in South Dublin County Council Development Plan 2016 – 2022

*Section 1.12.0 Employment Lands*

*Section 4.3.0 Employment Location Categories*

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

*Section 7.2.0 Surface Water & Groundwater*

*Section 8.2.0 Watercourses Network*

*Section 11.2.5 Enterprise and Employment Areas*

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

*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*

*Section 11.6.0 Infrastructure and Environmental Quality*

*(i) Flood Risk Assessment*

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(ii) *Surface Water*

(iii) *SUDS*

(iv) *Groundwater*

(v) *Rainwater Harvesting*

(vi) *Water Services*

*Section 11.7.2 Energy Performance in New Buildings*

*Section 11.8.1 EIA*

*Section 11.8.2 Appropriate Assessment*

### **Relevant Government Guidelines**

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

Regional Spatial & Economic Strategy 2019 - 2031, Eastern & Midlands Regional Assembly, (2019).

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

Design Manual of Urban Roads and Streets, Department of Transport, Tourism and Sport and Department of the Environment, Community and Local Government, (2013).

### **Assessment**

The main issues for assessment relate to:

- Zoning and Council Policy;
- Architectural Conservation;
- Design and Layout;
- Traffic and Parking;
- Landscaping;
- Heritage;
- Services and Drainage;
- Environmental Health;
- Aviation Safety;
- Appropriate Assessment; and
- Environmental Impact Assessment.

### ***Zoning and Council Policy***

The proposed development is consistent in principle with Zoning Objective 'EE': 'To provide for enterprise and employment related uses'. Warehousing is Permitted in Principle under this Zoning Objective. Under the CDP Warehousing is defined as '*A building or part thereof where goods are stored or bonded prior to distribution and sale elsewhere. It may include the storage of commercial vehicles where this is ancillary to the warehousing function*'.

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Offices 100 sq.m – 1,000 sq.m in size are Open for Consideration under Zoning Objective EE. In this case, Unit 1's ancillary office areas would be approx. 362 sq.m in size and Units 2's would be approx. 536 sq.m in size. For Unit 1 the office comprises approx. 4.4% of the area of the unit and for Unit 2 it would be approx. 8.9%. Collectively, the office areas would comprise approx. 6.4% of the overall development. The proposed office accommodation would be ancillary to the warehouse use and is therefore considered to be consistent in principle with the EE zoning.

### *Architectural Conservation*

There is no report from the Architectural Conservation Officer. Notwithstanding this, the Planning Authority has assessed the proposed development in regard to its proximity to RPS No. 261 Royal Garter Stables. This is described under the CDP as 'Stone Stables'. At its closest point Unit 2 would be located approx. 32.0 m from the Protected Structure. The Architectural Heritage Impact Assessment submitted by the applicant states that *'proposed unit 2 would be located outside a line drawn from the south-western corner of the application site, 150 m to the east of the stable structure, the north-western corner of the Royal Garter Stables, thereby ensuring that the view of the end of the stables is unobstructed... it is proposed to provide landscaping along the road frontage...'*

It is noted that Unit 2 is setback approx. 24.9 m to 33.3 m from the southern boundary with Naas Road (N7). The Planning Authority has concerns in regard to the retention of the views of the Protected Structure when approaching it, particularly from the south-west. In front of Unit 2 would be surface car parking, which has the potential to disrupt views and could negatively detract from the setting of this Structure. The photomontages submitted do not provide sufficient information in regard to this. **This should be addressed via Additional Information and where, visual impact will occur, mitigation measures should be proposed this may include the realignment and relocation of Unit 2 on site, moving it further away, and the choice of materials.**

The southern and eastern elevations of Unit 2, nearest to the Protected Structure, would be comprised of contemporary materials and forms. The unit would be a higher building height than the Protected Structure. While the height and proximity of the unit to the Protected Structure might be acceptable the applicant should ensure that the unit is sensitively designed so as not to detract from the Structure. **The applicant should confirm via Additional Information what measures**

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**have been undertaken to ensure this. If any changes are required these should be identified and a revised proposal submitted.**

There is a stone wall along the majority of the site's southern boundary that extends up to the neighbouring stables building. The drawings indicate that the proposed boundary along the southern boundary is Fence Type B, which is an approx. 1.2 m stone wall, seemingly to match the existing stone wall along this boundary and connect with the existing fence at the Protected Structure.

The applicant should liaise with SDCC's Architectural Conservation Officer to discuss the proposed development and any design changes. **If any modifications are required these should be submitted by way of Additional Information.** Any proposed interference with the existing wall will not be looked upon favourably.

#### *Design and Layout*

##### Design

The proposed warehouses would consist of 2 no. units. Unit 1 would be approx. 8,156 sq.m in gross floor area and Unit 2 would be approx. 5,990 sq.m in gross floor area. Both units would have a warehouse area, and ancillary office areas and staff facilities provided over three storeys. In terms of overall building height, Unit 1 would be approx. 16.35 m in height and Unit 2 would be approx. 15.35 m. In principle the proposed heights are considered to be acceptable, subject to measures that mitigate the impact of the development on the protected structure. The height is also compliant with maximum building height limit of 20 m within the Department of Defence Inner Zone.

The proposed materials would be glazing panels and different industrial cladding in different colours including 'grey white', 'anthracite grey' or 'graphite' or equivalent. On the ancillary office accommodation would be curtain wall panels and strip glazing and different colour shades of cladding panel. The use of varying materials and colour would help reduce the bulk, massing and scale of the proposed buildings. The front façade of Unit 2 and the eastern elevations of both units would be the most visible from the public realm. The photomontages submitted by the applicant do not however capture the full picture of the proposed development. **The applicant should be requested to submit additional photomontages. This should include from the N82 bridge and from the Protected Structure. All photomontages should also show the growth in the proposed vegetation over time by providing proposed photomontages for Years 1, 5 and 10.** The applicant should liaise with SDCC's Architectural Conservation Officer to discuss the proposed development and any resulting impact on the setting of the Protected Structure. **If any modifications are required these should be submitted by way of Additional Information.**



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#### Layout

Unit 1 would be located to the rear of the site approx. 8.5 m to 11.25 m from the rear (northern) boundary. There would be a separation of approx. 84.0 m between the two units. The service yard and HGV loading areas for the units would be relocated to the centre of the site, between the two units. This is considered appropriate given they would be largely screened from the N7. Landscaping would also help screen these areas from the east. Amenity (seating) areas would be provided to the east and south east of Unit 1 and appear to be accessible to both units. **There is an area of surface car parking to the front of Unit 2 and as advised, in regard to the Protected Structure, this should be reviewed as part of Additional Information and relocated away from the Protected Structure and/or screened.**

A 10 m 'buffer' has been proposed along the western boundary, to the east of the stream along this boundary. This is described as a no build zone, and it is proposed to retain the existing vegetation within this. The Planning Authority notes this boundary is significantly vegetated, even beyond 10 m from the stream. G3 Objective 2 of the CDP requires a biodiversity protection zone **of not less than** 10 m from the top of the bank of all watercourses, with the full extent of the protection zone to be determined on a **case by case basis** by the Planning Authority, based on site specific characteristics and sensitivities. Based on the site analysis, and the reports from the Public Realm and Heritage sections, it is considered that in this case 10 m is insufficient to maintain and protect this green corridor, especially having regard to the findings of the Ecological Report. **The Planning Authority should seek via Additional Information for this setback to the reviewed in line with landscape and heritage considerations outlined in the following sections.**

The Site Lighting Services drawing indicates that cables and lighting would be installed along the western side of the proposed units, within the above described 10 m buffer. Lighting for the development needs to be cognisance of the impact on the ecology of the site, the neighbouring Protected Structure and the N7. As identified by the Public Realm and Heritage Sections, insufficient information has been provided in regard to bats and other species. **Depending on the results from additional surveys the lighting proposal may need to be revised to appropriately address these concerns. Lighting should be dimmed as much as possible. Potential disturbance to the vegetation buffer and protected species should be addressed.**

No details in regard to the proposed signage have been submitted although it is listed in the statutory description of the development. **The applicant should be requested via Additional Information to confirm if signage is being applied for as part of this permission.** If not, the applicant should be satisfied that any future signage has the relevant planning permission. Any signage should ensure it is cognisance of the neighbouring Protected Structure.

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#### *Traffic and Parking*

It is proposed to remove the existing roundabout within the site and provide an access road off the existing roundabout to the east of the site to both the subject site and to the neighbouring stables building. Access to the car parking areas for the units would be off this access road, to the north for Unit 1 and to the south for Unit 2. The access road then continues in order to provide separate HGV access for each unit. The stables building would be accessed off the road to the car parking area for Unit 2. Footpaths would be provided along these roads to the units and to the stables building.

Fire tender access has been provided around Unit 1, the material of which is to be open texture Macadam. The Planning Authority has concerns in regard to the use of this material when a more greened material would be more appropriate, especially having regard to the rich biodiversity existing along the entire western boundary. This might include the use of grasscrete or similar proposal. **This should be addressed via Additional Information. Revised cross sections should be required clearly showing any revised materials and associated drainage. It is also noted that access for an emergency fire vehicle is not provided fully around Unit 2 (not on the western side). The applicant should clarify whether fire vehicle access is fully provided for both units as part of Additional Information. If this is required, the applicant should submit revised proposals to relocate and/or reduce Unit 2 away from the western boundary.**

The proposed development would include the provision for 109 no. car parking spaces and 48 no. bicycle parking spaces. 59 no. of the car parking spaces would be provided for Unit 1 and 50 no. spaces for Unit 2. The Roads Department have reviewed the proposed development and have no objections to the proposed parking spaces. Under the CDP the maximum car parking requirement for the development would be 82 no. for Unit 1 and 60 no. for Unit 2 (142 no. spaces in total). The proposal provides for 77% of the maximum requirement overall, and 72% for Unit 1 and 83% for Unit 2. The CDP requirement is a maximum limit and therefore the proposed quantity is considered to be in compliance.

Of these car parking spaces 7 no. would be mobility impaired spaces. The applicant has indicated 10% of the total car parking spaces would have Electric Vehicle infrastructure. The location of these EV spaces is not indicated on the proposed drawings and should be agreed with the Planning Authority prior to construction as a condition.

Under the CDP the minimum bicycle parking requirement for the proposed development is 41 no. for Unit 1 and 30 no. for Unit 2 (71 no. in total). The Roads Department has stated that due to the limited cycling infrastructure in the area the proposed quantity is feasibly appropriate. The Planning Authority considers that due to the use of the site for warehousing this provision of bicycle parking is considered to be generally compliant.

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It is noted that Table 11.25 of the CDP outlines the thresholds for the submission of a Workplace Travel Plan. Due to the size of the proposed units and the proposed under supply of bicycle parking, a Workplace Travel Plan Statement is required for each unit. **The applicant should be requested to submit these via Additional Information.** This would also help confirm if the proposed parking numbers are appropriate.

The Roads Department has reviewed the proposed development and state no objection subject to the following conditions:

1. *Prior to commencement of any works in the public domain, and in order to comply with The Roads Act 1993 Section 13 Paragraph 10, a Road Opening Licence must be secured from South Dublin County Council, Roads Maintenance Department.*
2. *All items and areas for taking in charge shall be undertaken to a taking in charge standard. Prior to development the applicant shall submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.*
3. *Prior to commencement of development, the applicant shall submit a developed Construction Traffic Management Plan for the written agreement of the Planning Authority.*
4. *Prior to commencement a Public Lighting Design for the development must be submitted and agreed by the Public Lighting team of SDCC.*
5. *Any road sign proposed and or to be installed shall comply with most up to date Chapter 5 (REGULATORY SIGNS) of the Traffic Signs Manual.]*
6. *Bicycle and pedestrian routes within the development must conform to Table 11.22: Minimum Bicycle Parking Rates– SDCC County Development Plan 2016-2022.*
  - a. *The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users.*
  - b. *All external bicycle parking spaces shall be covered.*
  - c. *Footpath layout shall provide adequate connectivity around the development and footpaths on the main road.*

In the event of a grant of permission the above recommended conditions should be included as such.

Transport Infrastructure Ireland provided:

*In the case of the above planning application, the Authority will rely on your planning authority to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to the following:*

*The proposed development shall be undertaken in accordance with the recommendations of the Transport (Traffic) Assessment and Road Safety Audit submitted. Any recommendations arising*

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*should be incorporated as Conditions in the Permission, if granted. The developer should be advised that any additional works required as a result of the Transport Assessment and Road Safety Audits should be funded by the developer.*

Any recommendations from these reports that have not already been incorporated into the proposed development should be conditioned as such in the event of a grant of permission.

### ***Landscaping***

As stated the existing western buffer is not considered to be sufficient. Policy G3 Objectives 2 and 5 and IE2 Objective 9 of the CDP require the protection of corridors such as that located along the western boundary. There is significant vegetation along the watercourse, and it is necessary in this case to consider an ecological protection zone wider than 10 m. It is also noted that no above ground, natural SuDS measures are proposed. **Given the site's existing environment the applicant should be requested to review the proposal and incorporate above ground, natural surface water drainage measures into the design, in accordance with Policies and Objectives contained within Chapters 7 and 8 of the current County Development Plan.**

The Public Realm Section has reviewed the proposed development and request further information:

1. *Arboricultural Impact of the Proposed Development*  
*The tree survey, impact assessment and protection measures do not include the young locally important immature woodland edge, WS2, in the west of the site or the trees close to the northern and north-eastern boundaries adjacent to the site. The tree survey, arboricultural impact assessment and tree protection measures should take note of these tree groups and incorporate measures in the arboricultural impact assessment to make sure there is no impact on these trees, e.g. positioning of storage areas/bunds etc. Every effort should be made to retain existing trees and woodlands where possible. Mitigation planting to ensure net gain. ADDITIONAL INFORMATION*
2. *Impact of Development Blue-Green Infrastructure/SuDS*  
*The Public Realm Section consider that the proposed development is contrary to Policy G5 - Sustainable Urban Drainage Systems and Objectives G5 1 and G5 2 in the County Development Plan. The applicant should be requested to:*
3. *revisit the design and layout of the proposed development and demonstrate how the development will comply with these policies and objectives.*
4. *submit revised plans and particulars addressing item 1 and demonstrate how natural SUDS features can be incorporated into the design of the proposed development*  
*The SuDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement. The applicant shall show further proposed SuDS features for the development such as Green*

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roofs, SuDS tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. SuDS could be incorporated into measures to retain the woodland edge WS2 for example.

The revised plans should incorporate:

- I. more trees to break up the car park hard standing areas in the North East We require a tree every 5 parallel and 2 perpendicular car park spaces ensuring 5m separation from lighting columns. All car park trees and trees adjacent to hard standing should be incorporated SuDS tree pits.
- II. A landscape section through the northern boundary. *ADDITIONAL INFORMATION*
5. Bat Survey  
We note that a preliminary bat roost survey was carried out in February 2021 and a review of JBA/NBDC records within 2km and 10km was carried out. The applicant is requested to submit a bat roost survey and a bat activity survey for bat usage for the entire site and immediately adjoining sites during summer period when bats are active. The applicant should provide a site-specific assessment of the potential impact on these species arising from the proposed development. This is to be undertaken by a qualified and experienced bat expert at the appropriate time of the year for the survey of species. *ADDITIONAL INFORMATION*
6. Boundary Details  
The applicant is requested to provide details of Fence Type A and B and of fencing types along all boundaries. A boundary plan is required clearly stating what fencing/boundary wall treatments are to be provided. *ADDITIONAL INFORMATION*
7. Visual impact of the proposed development.  
A photomontage should be provided of a view straight into the site from the Naas Road. The applicant should assess if screening along this boundary is sufficient and propose appropriate measures if not/augment proposed screening with further measures. *ADDITIONAL INFORMATION*

#### Summary

The proposed development in its current configuration will introduce significant hard infrastructure to a greenfield site having an effect on the existing trees, woodland planting and associated biodiversity and ecology within the development site area. This proposed development would materially contravene policy G5 Objective 1 and other GI policies and objectives in the County Development Plan.

The Public Realm Section is requesting that the applicant alter the layout of the proposed development in order to ensure the integration of natural Sustainable Urban Drainage features that incorporate amenity and biodiversity and strengthen green infrastructure. Further information is also required in relation to tree protection, bats, visual impact and boundary treatment.

**The above concerns should be addressed via Additional Information.**

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### ***Heritage***

The Ecological Impact Assessment submitted with the application identifies a potential inactive otter holt located in the south-west corner of the site, along the right bank of the Camac tributary, and a potential inactive Badger sett was also located in the north-west corner of the proposed site, within the mixed broadleaved woodland habitat. The Planning Authority, along with the Heritage Officer, does not consider sufficient information has been provided to confirm whether these are inactive. It is also noted the time at which this survey and the other ecological surveys were not undertaken at the appropriate time of year. **This should be addressed by way of Additional Information. This should inform the revision of the biodiversity protection zone along the western boundary.**

While the site is not within or near an area of archaeological potential, it is located in close proximity to a Protected Structure and is a green field site which has remained untouched for many years, where the original stone walls and water course remains in situ. **It is therefore considered prudent in this instance to seek an archaeological assessment by way of Additional Information.**

The Heritage Officer has reviewed the proposed development and requests further information: *I have reviewed the ecological report submitted as part of the application SD21A/0162 and make the following comments:*

- *The ecological Assessment was undertaken in February 2021 at a time of the year which is inappropriate for the assessment of many ecological elements including habitat surveys, breeding bird surveys, and bat surveys. This is of significant concern as the full ecological resource on the site, and its contribution to green infrastructure links through this area has consequently not been fully assessed.*
- *A potential Badger sett (with two entrances) and a potential otter holt was recorded along the stream on the western boundary. Further detailed assessment is required to determine the usage of these mammal resting places and appropriate mitigation measures are necessary to either avoid or minimise impact on these species. The applicant is advised that derogation licenses may be required from National Parks and Wildlife Services in respect of disturbance to these species.*
- *The applicant is advised that the Camac River (and potentially its tributaries) are a known location for Freshwater Crayfish, a species which is protected under both Irish law and the EU Habitats Directive. An assessment of the stream on the western boundary for this species would be required in order to ensure sufficient mitigation is in place to protect this and other aquatic species.*

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- *It is considered that the development as currently proposed encroaches too closely to the stream on the western boundary. A more appropriate setback from this important ecological feature is required, in order to provide sufficient protection of protected species and biodiversity in general.*

*Recommendations: I recommend that Additional information be requested as follows:*

- *A more detailed assessment of the ecology present on the proposed development site and commuting through the site is requested. This more detailed survey is to be undertaken during the appropriate season for the assessment of habitats, breeding birds, Freshwater Crayfish, and bats.*
- *A redesign of the proposed development is requested, to allow for a greater setback from the stream on the western boundary. Otter can range up to 20m from rivers and streams through the type of habitat currently present on the site. Given the protection afforded to this species, a greater setback from the stream is required than currently proposed.*
- *Also, I recommend that an archaeological assessment of the site be prepared as part of this request for Additional Information.*

**It is recommended that the applicant addresses these concerns by way of Additional Information.**

#### ***Services and Drainage***

Water Services has reviewed the proposed development and has no objection subject to the following:

*Surface Water Report: No objection subject to:*

- 1.1 *Prior to commencement of development the applicant shall submit a drawing showing that proposed buildings are setback a minimum distance of 4.5m from existing 450mm surface water drainage sewers traversing the site to the north and south. The applicant may obtain a map showing indicative locations of existing surface water drainage infrastructure on the site by contacting [servicemaps@sdublincoco.ie](mailto:servicemaps@sdublincoco.ie).*

*Flood Risk Report: No objection:*

- *The Developer shall ensure that there is complete separation of the foul and surface water drainage for the proposed development.*
- *All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B.*
- *All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works.*

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**The Water Services report is noted, however, having regard to the Public Realm report, Heritage report, and relevant Council policy the proposed surface water infrastructure is considered to be insufficient and should be addressed via Additional Information.**

**Any revisions to the proposed development should take into account the required minimum distance of 4.5m from existing 450mm surface water drainage sewers traversing the site to the north and south.**

Irish Water has reviewed the proposed development and requests further information as follows:

### *1. Water*

*In order to assess the feasibility of a connection to public water infrastructure further information is requested as follows;*

*The applicant is required to engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public water infrastructure. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.*

*Reason: In the interest of public health and to ensure adequate water facilities.*

### *2. Foul*

*In order to assess the feasibility of a connection to public waste water infrastructure further information is requested as follows;*

*The applicant is required to engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public waste water infrastructure. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.*

*Reason: In the interest of public health and to ensure adequate waste water facilities.*

**It is recommended that the applicant addresses these concerns by way of Additional Information.**



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### ***Environmental Health***

The H.S.E. Environmental Health Officer has reviewed the proposed development and finds it acceptable subject to the following conditions:

1. *No heavy / noisy construction equipment or machinery (to include pneumatic drills, construction vehicles, generators, etc) shall be operated on or adjacent to the construction site before 07:00 hours on weekdays and 09:00 hours on Saturdays nor after 19:00 hours on weekdays and 13:00 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays.  
Any work outside of these hours shall only be permitted following a written request to the Planning Authority and subsequent receipt of the written consent of the Planning Authority, having regard to the reasonable justification and circumstances and a commitment to minimise as far as practicable any unwanted noise outside the hours stated above.*
2. *Noise levels arising from construction activities shall not be so loud, so continuous, so repeated, of such duration or pitch or occurring at such times as to give rise to a noise nuisance affecting a person in any premises in the vicinity.*
3. *During the construction / demolition phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances.*
4. *A suitable location for the storage of refuse shall be provided during the construction and operational phase of the development so as to prevent a public health nuisance.*
5. *The applicant shall put in place a pest control contract for the site for the duration of the construction works.*
6. *The development shall be so operated that there will be no emissions of malodours, gas, dust, fumes or other deleterious materials, no noise vibration on site as would give reasonable cause for annoyance to any person in any residence, adjoining unit or public place in the vicinity.*
7. *Noise due to the normal operation of the proposed development, expressed as Laeq over 15 minutes at the façade of a noise sensitive location, shall not exceed the daytime background level by more than 10 dB(A).*
8. *Clearly audible or impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level.*
9. *Signage or lighting to be used on site during both construction and the on-going operation of the development must not be intrusive to any light sensitive location including residential properties in close proximity to the development.*
10. *Any connections to the main sewer must be connected so as not to give rise to a public health nuisance.*

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The report from the Environmental Health Officer is noted and the above would be conditioned in the event of a grant of permission.

#### *Aviation Safety*

The subject site is located within the Department of Defence Inner Zone Limit. This Zone includes specific requirements, including in regard to building height, which has previously been addressed in this report. The Department of Defence has been consulted on the proposed development and they stated the following observations:

1. *Given the proximity to Casement Aerodrome, operation of cranes should be coordinated with Air Corps Air Traffic Services, no later than 28 days before use, contactable at [airspaceandobstacles@defenceforces.ie](mailto:airspaceandobstacles@defenceforces.ie) or 01-4037681.*
2. *Due to the proximity to Casement Aerodrome, appropriate bird control measures will need to be taken during construction to mitigate the risk to Air Corps flight operations.*

The report is noted and the above addressed by way of condition in the event of a grant of permission.

#### *Screening for Appropriate Assessment*

The applicant has provided a Screening for Appropriate Assessment report from JBA Consulting. This report identifies that 10 no. Natura 2000 sites are located within the 15km (plus hydrological connectivity extension) Zone of Influence (ZoI) of the proposed development. The potential adverse impacts from the proposed development that were identified as could cause a significant effect on the Qualifying Interests of a Natura 2000 site via surface water, groundwater and land and air pathways. It was found that due to the proposed site's natural riparian filter buffer, appropriate operational drainage systems, and its proximity to Natura 2000 sites within the ZoI, impacts via surface water, ground water and land pathways to Natura 2000 sites are not anticipated. Given this, it was considered that there cannot be any cumulative or in-combination impacts.

**Additional Information is required as advised above, which would assist the Planning Authority in determining screening for Appropriate Assessment. This includes further information on the intended warehouse use.**

#### *Screening for Environmental Impact Assessment*

Having regard to the information submitted as part of the planning application, the nature and extent of the development, and the distance of the site from nearby sensitive receptors, there is no 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.

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### Conclusion

Having regard to the:

- provisions of the South Dublin County Development Plan 2016-2022,
- the established character of the area, and
- the nature and scale of the proposed development,

it is considered that **Additional Information** is required to ensure that the proposed development would be in compliance with Council policy, would not seriously injure watercourses, biodiversity, and visual amenity, and would, therefore, be in accordance with the proper planning and sustainable development of the area.

### Recommendation

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

1. The Planning Authority has concerns in regard to the potential impact of the proposed development on the neighbouring Protected Structure RPS No. 261 Royal Garter Stables. This includes the retention of the views of the Protected Structure when approaching it from the south-west. In front of Unit 2 would be surface car parking, which has the potential to disrupt views and could negatively detract from the setting of this Structure. The applicant is requested to review the area to the front of Unit 2 in regard to impact on the views of the Protected Structure. While the height and proximity of Unit 2 to the Protected Structure might be acceptable the applicant should ensure that the unit is sensitively designed so as not to detract from the Structure. The applicant should confirm what measures have been undertaken to ensure this. If any modifications are required these should be identified and a revised proposal submitted. The applicant should liaise with SDCC's Architectural Conservation Officer on this item.
2. A 10 m 'buffer' has been proposed along the western boundary, to the east of the stream along this boundary. This is described as a no build zone, and it is proposed to retain the existing vegetation within this. The Planning Authority notes this boundary is significantly vegetated, even beyond 10 m from the stream. Based on the site analysis, and the reports from the Public Realm and Heritage sections, it is considered that in this case

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10 m is insufficient to maintain and protect this green corridor. The applicant is requested to review and extend this buffer significantly eastwards having regard to the protection of the existing vegetation along this boundary and of protected species (based on additional site surveys). The proposed lighting plan should be revised with regard to this buffer and the results of the ecological surveys and relocated away from the western ecological area.

4. Table 11.25 of the South Dublin County Development Plan 2016-2022 outlines the thresholds for the submission of a Workplace Travel Plan. Due to the size of the proposed units both being over 2,500 sqm, a Workplace Travel Plan Statement is required for each unit.
5. The Planning Authority requests the following in regard to surface water:
  - a) It is noted that no above ground, natural SuDS measures are proposed. Given the site's existing environment, the applicant is requested to review the proposal and incorporate above ground, natural surface water drainage measures into the design. The applicant shall show further proposed SuDS features for the development such as Green roofs, SuDS tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. The revised plans should incorporate:
    - I. More trees to break up the car park hard standing areas in the North East. A tree every 5 parallel and 2 perpendicular car park spaces is required ensuring 5m separation from lighting columns. All car park trees and trees adjacent to hard standing should incorporate SuDS tree pits.
    - II. A landscape section through the northern boundary.
  - b) The Planning Authority has concerns in regard to the use of the proposed material open texture macadam for the fire tender access and car parking areas when a more greened material would be more appropriate. This might include the use of grasscrete or similar. The applicant is requested to submit revised proposals for 'greened' pathway solutions and submit revised cross sections clearly showing any revised materials and associated drainage.
  - c) It is also noted that access for an emergency fire vehicle is not provided fully around Unit 2 (not on the western side). The applicant should clarify whether fire vehicle access is fully provided for both units. If this is required, the applicant is requested to submit revised proposals to relocate and/or reduce Unit 2 away from the western boundary.
6. The applicant is required to engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public water supply and waste water infrastructure. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.
7. a) A more detailed assessment of the ecology present on the proposed development site and commuting through the site is requested. This more detailed survey is to be

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undertaken during the appropriate season for the assessment of habitats, breeding birds, Freshwater Crayfish, and bats.

- b) The applicant is requested to submit a bat roost survey and a bat activity survey for bat usage for the entire site and immediately adjoining sites during summer period when bats are active.
  - c) The applicant is requested to provide a site-specific assessment of the potential impact on these species arising from the proposed development. This is to be undertaken by a qualified and experienced bat expert at the appropriate time of the year for the survey of species.
8. The applicant is requested to prepare and submit an an archaeological assessment of the site. While the site is not within or near an area of archaeological potential, it is located in close proximity to a Protected Structure and is a green field site which has remained untouched for many years, where the original stone walls and water course remains in situ.
  9. No details in regard to the proposed signage have been submitted although it is listed in the statutory description of the development. The applicant is requested to confirm if signage is being applied for as part of this permission. If not, the applicant should be satisfied that any future signage, and proposed lighting thereof, has the relevant planning permission. Any signage, and associated lighting, should ensure it is cognisance of the neighbouring Protected Structure and ecology found on the site.
  10. The applicant is requested to provide details of Fence Type A and B and of fencing types along all boundaries. A boundary plan is required clearly stating what fencing/boundary wall treatments are to be provided. The applicant should note that interference with the existing stone wall would not be acceptable to the Planning Authority.
  11. The applicant is requested to submit additional photomontages (and revised photomontages due to potential changes to the proposal) to capture the full visual impact of the proposed development. These should include from the N82 bridge, from the neighbouring Protected Structure and a view straight into the site from Naas Road (N7) and the site as seen from a south-west and north-east view from the N7. All photomontages should also show the growth in the proposed vegetation over time by providing proposed photomontages for Years 1, 5 and 10. The applicant should assess if screening along the southern boundary is sufficient and propose appropriate measures if not/augment proposed screening with further measures.

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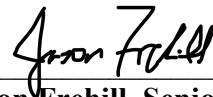
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REG. REF. SD21A/0162

LOCATION: Brownsbarn, Citywest Campus, Dublin 24.



**Tracy McGibbon**  
Senior Executive Planner



**Jason Frehill, Senior 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:** 13 August 2021



**Mick Mulhern, Director of Land Use,  
Planning & Transportation**