

**An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department**

Telephone: 01 4149000

Fax: 01 4149104

Email: planningdept@sdblincoco.ie

**Mark McCarthy,
TOBIN Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin
D15 X98N**

**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING
REGULATIONS THEREUNDER**

Decision Order Number: 1121	Date of Decision: 19-Aug-2021
Register Reference: SD21A/0167	Registration Date: 25-Jun-2021

Applicant: Shane Minehane, Greener Ideas Limited

Development: Construction of a gas fired power plant with an electrical output of up to 125MW with associated balance of plant, equipment and buildings including; an Engine Hall building with a height of 18.9m, comprising 6 gas engines and ancillary infrastructure; an Electrical Annex Building with a height of 18.7m; a Workshop building with a height of 5.1m; a Tank Farm building with a height of 5.68m; a Security hut with a height of 3.27m; an Exhaust Stack with a height of 31.8m; a Gas AGI including a kiosk with height of 3.3m; Radiator Coolers with a height of 8.46m; 2 electrical transformers with a height of 4.98m; Tanks including 2 x Diesel Oil Storage Tanks (volume of 2500m³ combined); SCR Urea Tank (26m³); Lube Oil Storage Tank (26m³); Lube Oil Maintenance Tank (26m³); Pilot Oil Tank (26m³); Fire Water Storage Tank (1000m³); Effluent Collecting Tank (26m³); Underground Surface Water Attenuation Tank (490m³); 2 new access onto the existing private road network with Profile Park; 12 parking spaces, footpaths, landscaping; fencing and all other associated site development plant and equipment and other works including surface water and foul wastewater drainage.

Location: Profile Park, Baldonnell, Dublin 22

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 25-Jun-2021 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. a) The applicant is requested to provide an addendum to the submitted design statement, which takes into consideration an assessment in terms of Paragraph 11.2.0 and tables 11.17 and 11.18 of the County Development Plan.
b) The applicant is requested to make modifications to address all requirements laid out in the sections of the County Development as listed in Item a).
c) All changes to the design shall be clearly reasoned and should demonstrate compliance with the objectives and policies of the County Development Plan.
2. a) The Planning Authority has concerns regarding the design of the proposed development in terms of bulk and massing. There are also concerns that the proposed development represents an overdevelopment of the site given its footprint, hardstanding and underground attenuation tank. The applicant is requested to review the submitted development and revise the plans / provide further justification for the scale in terms of:
 - i main gas generation building - there is currently no breaking up in terms of the design of the facades.
 - ii The applicant is requested to revisit the design of the elevations fronting the site boundaries and add detail.
 - iii scale / height of the tanks - these appear quite prominent in the local context. The applicant is requested to reduce the scale of these (this could include an increased number of smaller tanks).
 - iv scale and height of the stacks. These are extremely prominent and are encased in a structure for the most part. The stacks are significantly taller than all surrounding structures. The applicant is requested to reduce the height and bulk of the structures. The Planning Authority would welcome a height of no more than 25m.
 - v overall level of development on the site. There are concerns that the proposal is overdevelopment. The applicant is requested to set out the percentage of land taken by buildings / tanks etc, roads and open spaces / attenuation. The applicant should investigate other lands to attenuate to to provide for open and natural attenuation.
- b) The applicant is also requested to provide an existing layout plan, indicating all natural features present.

Note: The above will likely result in significant additional information and therefore revised notices will be required.

3. The proposed power station introduces significant hardstanding and building development into the landscape which potentially runs contrary to Policy IE Objective 5 in the County Development Plan and other policies and objectives contained in Chapters 7 and 8 of the same plan. The applicant is requested to provide revised proposals demonstrating the following:

- 1) A reduction in hardstanding and soil sealing across the entire site
- 2) Increased planting to provide, that includes for the augmentation of biodiversity and increased ecology on the site. Clearly demonstrating how it links to other Green Infrastructure in the area.
- 3) How the landscape proposals can provide for above ground attenuation incorporating natural solutions. Please note the Planning Authority only accept underground attenuation tanks as a last resort. An alternative location should be sought and found for the provision of nature-based solutions and above ground attenuation or perhaps an alternative location should be found for the proposed development.
- 4) A landscape layout that ensures that a higher percentage of the soft natural SuDS features in the landscape are retained and augmented.

The applicant is requested to address all of the above issues.

4. a. In order for Water Services to assess surface water attenuation proposals, the applicant is requested to submit a report including design calculations showing how surface water up to and including the 1:100 (1%) year critical storm with climate change allowance will be attenuated on site to pre-developed greenfield run off rates. The report should include the following site information:
 - SAAR (Standard Average Annual Rainfall) Value
 - SOIL Value
 - MET Eireann Rainfall Data
 - Site Area
 - A breakdown of all proposed area types in m² for the site eg. Roads, Hardstanding, Grasscrete, Grass etc.
- b. The applicant is requested to submit a cross section detail of all proposed Sustainable Drainage (SuDS) features for the development ie. Grasscrete, Swales permeable paving, infiltration basins etc. The applicant shall also examine whether there is potential to include further SuDS features across the site such as detention basins, further swales, filter drains etc.
- c. The applicant is requested to submit a revised surface water drainage layout showing that surface water is discharged to the Baldonnel Stream in the direction of flow and not against the flow which is currently proposed. The drawing shall also show that the proposed attenuation system is a minimum of 3m away from all existing and proposed Wastewater and Water supply infrastructure on the site also external to the site.
5. There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Natural SUDS features should be incorporated into the proposed drainage system that address amenity, biodiversity and water quality as well as volume attenuation. The use of underground tanks should be avoided.

The applicant shall show further proposed SuDS features for the development such as green roofs, living walls, further natural swales, channel rills, integrated tree pits, bioretention, above ground attenuation, detention basins, reed bed/wetland etc. and other such SuDS and show what attenuation capacity is provided by such SuDS. The SuDS features should be integrated into the landscape

proposal and details provided on how they work.

6. There are some areas within the subject site located within Flood Zone B according to South Dublin County Council's Strategic Flood Risk Assessment 2016-2022 and OPW's (Office of Public Works) CFRAM maps. The applicant is required to provide compensation flood storage for any loss in existing flood plain storage to help ensure there will be no exacerbation of flooding issues upstream or downstream of the subject site. The applicant is therefore requested to submit plans, cross sectional details and design calculations which clearly demonstrates how flood compensation storage is being provided on the site given that it is proposed to build within a Flood zone B area. Note: natural solutions and open attenuation should be provided and investigated.
7. The proposed application highlights a potential for noise to impact on a number of nearby receivers. The noise levels predict a notable change in the noise level at these receivers during the night time period.
 - The applicant is required to assess and re-evaluate all noise emitting equipment proposed on site in this application.
 - The applicant must undertake necessary modifications to the proposed structures and operations on site in order to reduce the predicted noise levels at the nearby receivers to an acceptable level during both day and night time.
 - The development must not give rise to noise levels that exceed the background level for evening and night time periods.
 - The applicant must demonstrate the development can meet the standards set out by South Dublin County Council as noted below:

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) and shall not exceed the background level for evening and night time. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level.
8. The Planning Authority notes the report received from the Department. The development site is located in a historic area adjacent to the site of Recorded Monument DU021-004- Kilbride Castle. In addition, recent archaeological investigations for the site immediately to the West of the proposed site (ref Geophysical Survey 20R0080 for Profile Properties) has identified the remains of a sub-circular enclosure and associated field systems. Archaeological testing has also confirmed the presence of this feature (carried out under licence 21E0061). Having regard to known archaeological features/materials including an enclosure measuring approximately .30m in diameter in proximity to the site the applicant is requested to submit a full Archaeological Assessment of the lands as part of this Additional Information request. The Planning Authority notes the lack of information in the EIAR. The applicant should liaise directly with the Department prior to responding to this AI request and submit all details of this correspondence and agreements.
9. The applicant is requested to submit a revised layout showing the, bicycle parking and pedestrian routes within the development. Please refer 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.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked "ADDITIONAL INFORMATION" and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD21A/0167

Date: 20-Aug-2021

Yours faithfully,



for Senior Planner