

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
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Thornton O'Connor Town Planning
1, Kilmacud Road Upper
Dundrum
Dublin 14

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

Decision Order Number: 1208	Date of Decision: 09-Sep-2021
Register Reference: SD21A/0200	Registration Date: 16-Jul-2021

Applicant: Jordanstown Properties Limited

Development: Amendments principally comprising of an overall increase in the commercial floor area by 15,479sq.m from the permitted 13,959sq.m to 29,438sq.m; the permitted scheme has 3 internal ancillary office floor levels, and the proposed alterations provide 2 mezzanine levels in the warehouse area (i.e a total of 5 internal floor levels); the permitted maximum height of the development at 23.7 metres will remain unchanged; the additional 15,479sq.m development proposed will comprise an increase in the warehouse floor area from 12,369sq.m to 13,353sq.m, staff facilities from 548sq.m to 2,582sq.m and ancillary office area from 1,042sq.m to 2,437sq.m; in addition to the provision of a 2 storey mezzanine warehouse area (9,703sq.m), integrated plant room (434sq.m) and plant area on 2 floors (929sq.m); construction of a 2 storey car-parking area (4,057sq.m and 7.8m height) to accommodate an increase from the previously permitted 119 ancillary car parking spaces to 190 car parking spaces; 13 designated van parking spaces (no dedicated van spaces previously proposed); 72 permitted cycle parking spaces; reconfiguration of the HGV yard and an increase in the number of HGV dock levellers from 12 to 14 and the provision of 16 van loading level entry doors; the provision of an additional egress on the eastern boundary to facilitate vans exiting the site; sprinkler tank and associated underground pumps; repositioned ESB substation (15sq.m and 3m height); bin storage (42sq.m and 2.9m height); amended lighting layout; signage; modifications to hard and soft landscaping and boundary treatments; and associated site development works above and below ground.

Location: College Lane, Greenogue, Rathcoole, Co. Dublin

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 16-Jul-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. The Planning Authority has serious concerns regarding the significant increase in the proposed development, specifically the increase in office space, on this site and at this location, where there is insignificant access to an adequate bus service and no easy-access to light or heavy rail. Notwithstanding Sections 2.4 and 2.5 of Stephen Reid consulting Traffic and Transportation report, satisfactory proposals have not been submitted to demonstrate safe and convenient accessibility for increased pedestrians and cyclist movement to and from this location that would encourage staff out of their motorised vehicles. Furthermore, no justification has been submitted for this increase in office space. The applicant is requested to:
 - (1) Submit a rationale and justification for the increase in development on this site and clearly demonstrate compliance with County Development Plan policy and objectives (please note that the lands are zoned EE where office space is limited to less than 1,000sq.m).
 - (2) Outline the proposed use at this site and structure, submit details of operations and a justification for the provision of over 2,000sq.m of office space.
 - (3) The proposed increase in floor area results in the proposal to provide a multi-storey car park at this location. The Planning Authority has serious concerns regarding the proposal for a multi-storey car park on this site and in the vicinity of this site. Policy directs people intensive enterprise and employment into lands zoned for town centres and village centres and in location to good public transport. This is not the case at this location. A development requiring a multi-storey car park should be directed towards towns and villages. The granting of a multi-storey car park would be undesirable at this location and should be omitted. A revised design, site layout plan, and supporting reports shall be submitted to address all the points made.
 - (4) 72 permitted bicycle spaces are proposed. Under the County Development Plan one space is required per 200sq.m of additional floor space. In this instance this is 70 additional spaces. The applicant is requested to provide a total of 142 covered bicycle spaces. A revised layout plan shall outline the location of these 142 spaces.
2. The Planning Authority has serious concerns regarding the significant increase in the proposed development, resulting in a significant increase in proposed car parking. The applicant is requested to submit the following by way of additional information:
 - (1) An operational management plan which shall include no. of HGVs and Vans making deliveries to and from the proposed development during the operational phase of the proposed development.
 - (2) The applicant/developer is requested to clarify the following:
 - (a) Proposed hours and days of operation
 - (b) Number of staff

(c) Timing and number of HGV trucks expected to and from the site.

(3) Submit a robust justification for the quantum of car parking proposed on site having regard to County Development Plan Policy and an assessment of access to public transport in the area. The applicant shall note that the Development Plan parking standards are maximum standards. The proposal shall commit to developing a Mobility Management Plan for the proposed development, which should continue to promote the current trends to sustainable travel modes. Details of which should be submitted as part of the response to this request.

(4) A revised layout showing minimum 1.8m wide concrete pedestrian footpath along the perimeter of the warehouse connecting the fire escape doors to the safe assembly zones. (Taking note of the requirement to provide Green Infrastructure throughout the site)

(5) A swept path analysis for fire tenders and HGVs showing access to all required locations of the site shall be submitted and agreed by the Planning Authority. (Taking note of the requirement to provide Green Infrastructure throughout the site).

(6) A revised layout showing the Electric vehicle parking provision and facilities for charging electric vehicles within the proposed staff car parks.

3. The Planning Authority has serious concerns regarding the significant increase in the proposed development and the impact it will have on the receiving environment. The proposed development will cover practically the entire site, which is contrary to County Development Plan policy and objectives (specifically, but not exhaustive, Chapters 7 and 8). The previously permitted southern boundary buffer will be significantly encroached upon and no above ground swales or other Green Infrastructure proposals have been included in the proposals. The applicant is requested to:

(1) Submit a full redesign of the landscaping/green infrastructure proposals for the site which should include (as a minimum):

(a) A green roof/part green roof (over the office building)

(b) Swales

(c) Increased planting, berms and greened-buffer zones around the perimeter of the site, especially the southern boundary.

(d) Permeable paving throughout the site

(e) Planting between car parking spaces in accordance with the requirements of the County Development Plan.

(2) In addition, the Planning Authority requires:

(a) Street trees to be provided along the northern boundary adjacent to the estate access road. Native and/or pollinator friendly tree species shall be provided at 10m intervals and be a minimum 20-25cmg at planting.

(b) Street trees along the eastern boundary access road and within the car park shall also be a minimum 20-25cmg at planting.

Note: The applicant is referred to the substantial landscaping requirements of the site immediately west (Ref. SD19A/0065).

4. In addition to Item 3 of this Additional Information request, the Planning Authority notes that there is a lack of SuDS (Sustainable Drainage System) and Green Infrastructure shown for the proposed development, which is contrary to the policies and objectives of the current County Development Plan and harmful to the amenities of the area. Significant proposals to mitigate water run-off from the site through natural solutions should be included in revised proposals. Natural SuDS features shall be

incorporated into the proposed drainage system. The SuDS shall be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022.

(1) The applicant is requested to show further proposed SuDS features for the development such as green roofs, grass areas, tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS.

(2) A comprehensive management plan shall be submitted and agreed in writing by SDCC Public Realm Section to demonstrate that the SuDS features have reduced the rate of run off into the existing surface water drainage.

(3) A maintenance plan shall also be included as a demonstration of how the system will function following installation.

(4) SuDS Features to be shown on the Landscape Proposals with details on how they work.

5. The applicant is requested to submit and agree a comprehensive Tree Report with SDCC Public Realm Section by way of additional information. This shall comprise a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction - recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

(1) Tree Survey Plan: all trees and hedges on and adjacent to the subject site shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site

(2) Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.

(3) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).

(4) Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate.

(5) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.

(6) Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs) of all trees and hedgerows to be clearly shown on this drawing.

(7) Arboricultural Method Statement: clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

- (8) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- (9) Pre-Development Photo's: submit pictures of the existing trees/hedgerows. This shall include a location map of where each picture was taken from.
- (10) Arborist's name, arboricultural qualifications and contact details.
- (11) Date that the survey was carried out (surveys > 12 months are unacceptable).
6. The applicant is requested to submit proposals for the following bat mitigation measures throughout all construction works.
- (a) Provide for the protection of the hedgerows proposed for retention both during and after construction;
- (b) Provide details to the planning authority of a newly designed lighting system. Contact should be made between the applicant and the Council's Heritage Officer and a written statement detailing agreement should be submitted with the Additional Information response;
- (c) Details of a bat expert who will be employed to oversee bat protection works during construction and to undertake bat monitoring surveys for a period of three years post development.
7. The applicant is requested to provide details regarding the proposed signage for the development including dimensions and location.
8. An objection was received from the DOD regarding the following:
- (1) The proposed development with a height of 23.7m AGL is located within the 2km Zone for Casement Aerodrome.
- (2) The proposed development penetrates the upper limit of the 2km Zone by 2.3 meters.
- (3) The proposed development is located at 1.85km at its nearest point from Casement Aerodrome ARP.
- The applicant is requested, by way of additional information, to confirm if the points raised in the objection received from the DOD can be satisfactorily addressed within an appropriate report.

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/0200

Date: 09-Sep-2021

Yours faithfully,



for **Senior Planner**