



**THORNTON O'CONNOR**  
TOWN PLANNING

**Response to a Request for Further Information**

**In respect of a Warehouse Development at**

**Block R, Jordanstown Road, Aerodrome Business  
Park, Rathcoole, Co. Dublin**

**Submitted on Behalf of**

**Exeter Ireland Property IV B Limited**

November 2021

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THORNTON O'CONNOR  
TOWN PLANNING

Principal Planning Officer  
Planning Department  
South Dublin County Council  
County Hall  
Tallaght  
Dublin 24



Wednesday, 3<sup>rd</sup> November 2021

Dear Sir/Madam,

## RESPONSE TO REQUEST FOR FURTHER INFORMATION

South Dublin County Council Register Reference SD21A/0140

### 1.0 INTRODUCTION

#### 1.1 Response to *Request for Further Information* by Dublin County Council

This letter is submitted by Thornton O'Connor Town Planning<sup>1</sup> on behalf of Exeter Ireland Property IV C Limited<sup>2</sup> in response to a *Request for Further Information* issued by South Dublin County Council, dated 22<sup>nd</sup> July 2021, relating to an application for permission for development to provide a warehouse development at a site known as Block R, Jordanstown Road, Aerodrome Business Park, Rathcoole, Co. Dublin.

This response to the *Request for Further Information* has been prepared by Thornton O'Connor Town Planning in association with Kavanagh Burke Consulting Engineers<sup>3</sup>, JBA Consulting<sup>4</sup>, Stephen Reid Consulting Traffic and Transportation<sup>5</sup>, Digital Dimensions<sup>6</sup>, Axiseng Consulting Engineers<sup>7</sup>, Castlebrowne Building & Civil Engineering Limited<sup>8</sup> and O'Dwyer and Jones Design Partnership<sup>9</sup>.

#### 1.2 Key Design Changes Proposed

The scheme as lodged with the Planning Authority has been subject to modifications to address matters raised in the *Request for Further Information*. The modifications are shown on the plans and particulars submitted with this response to the *Request for Further Information* with the key changes summarised below for ease of information:

<sup>1</sup> No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

<sup>2</sup> No. 88 Harcourt Street, Dublin 2.

<sup>3</sup> Unit F3, Calmount Park, Ballymount, Dublin 12

<sup>4</sup> Unit 8, Block 660, Greenogue Business Plaza, Greenogue Business Park, Rathcoole, Dublin, D24 YN81

<sup>5</sup> Estuary House, New St, Malahide, Co. Dublin

<sup>6</sup> 1 Rathmines Rd Upper, Rathmines, Dublin 6, Do6 Y5P5

<sup>7</sup> 47 Mount Street Upper, Dublin, Do2 AC95

<sup>8</sup> Unit H, Grants Road, Greenogue Business Park, Rathcoole, Dublin, D24 NN53

<sup>9</sup> 28 Leeson Park, Dublin 6, Do6E338

### Key Design Changes:

- 1) Reduction in Gross Floor Area by 946 sq m from 22,966 sq m proposed at planning application stage to 22,020 sq m now proposed as part of this *Response to Request for Further Information*. The reduction in area comprises:
  - i) A reduction of a portion of warehouse beside the main front office block and addition of a new green space, i.e. loss of 410 sq m of warehouse area.
  - ii) Reduction in building floor area of 6 meters on the northern building side, i.e. loss of 536 sq m of floor area.
- 2) Proposed reduction in building height from 16 metres proposed at planning application stage to 15 metres now proposed as part of the amended design submitted with this *Response to Request for Further Information*.
- 3) The proposed building has been moved approximately 5 metres northwards to provide 10 metres (5 m more than originally proposed) of landscaping on the southern and eastern boundary.
- 4) New landscaped areas have been provided every 5 No. car parking spaces alongside a number of landscaped spaces that are proposed around the building/yard resulting in increased amounts of "greening" within the overall site plan.
- 5) Entire carpark portion along the narrow portion of the site (south-east zone) has been removed and only the footpath link has been retained in this area. Some 210 No. car parking spaces were originally proposed, which has been reduced to 146 No. car parking spaces.
- 6) The entire southern elevation has been revised with a new ceramic granite material to the office block curtain wall and "green wall" panels also added.

### 1.3 Documents Enclosed

Some 6 No. copies of the documents listed below are enclosed with this response to *Request for Further Information*.

#### 1.3.1 Response prepared by Thornton O'Connor Town Planning

- This Planning Response Letter prepared by Thornton O'Connor Town Planning, dated Wednesday, 3<sup>rd</sup> November 2021.

#### 1.3.2 Documents Prepared by Kavanagh Burke Consulting Engineers

- *Drainage Design Report*, dated October 2021.
- *Revised Design Statement*, dated November 2021.
- The following drawings have also been prepared:

Kavanagh Burke Consulting Engineers		
Drawing No.	Drawing Title	Scale
D1693 – GA-A01	Ground Floor Plan	1:200
D1693 – GA-A02	Frist Floor Plan	1:200
D1693 – GA-A03	Second Floor Plan	1:200
D1693 – GA-A04	Ancillary Office Enlarged Floor Plans	1:100
D1693 – GA-A05	Ancillary Drivers Office & Warehouse Toilet Block Floor Plans & Section A-A	As shown
D1693 – GA-A06	Section B-B	1:125
D1693 – GA-A07	Elevations	1:200
D1693 – GA-A08	Comparison Original Submission & Revised Front (South) Elevation	As shown
D1693 – GA-A09	Contiguous Elevation A-A & Elevation B-B	1:200
D1693 – GA-A10	Covered Bike Park	1:50
D1693 – D3	Site Plan with Swept Paths	1:500
D1693 – D3-A	Proposed Sightline at Jordanstown Road	1:200
D1693 – D4	Drainage & Watermain Layout	1:500
D1693 – SP-01	Sprinkler Tank & Pump House	1:100

### 1.3.3 Documents Prepared by JBA Consulting

- Ecological Impact Assessment prepared by JBA Consulting dated October 2021.
- The following drawings have also been prepared:

JBA Consulting		
Drawing No.	Drawing Title	Scale
FDJ-JBAI-XX-XX-DR-L-0003	Section Plans	As Shown
FDJ-JBAI-XX-XX-DR-L-0002	Landscape Masterplan	1:750
FDJ-JBAI-XX-XX-DR-L-0004	Planting Plan	1:750

### 1.3.4 Documents Prepared by Axiseng Consulting Engineers

- Part L Compliance Report prepared by Axiseng Consulting Engineers.
- The following drawing has also been prepared:

Axiseng Consulting Engineers		
Drawing No.	Drawing Title	Scale
SRA-AXE-XX-XX-DR-E-60101	Site Lighting Drawing	1:1000



### **1.3.5 Documents Prepared by Castlebrowne Building & Civil Engineering Limited**

- An *Outline Construction & Demolition Waste Management Plan* prepared by Castlebrowne Building & Civil Engineering Limited dated September 2021.

### **1.3.6 Documents Prepared by Digital Dimensions**

- Verified View Montages by Digital Dimensions.

### **1.3.7 Documents Prepared by O'Dwyer and Jones Design Partnership**

- An *Aviation Safety Assessment Report [Additional Information]* prepared by O'Dwyer and Jones Design Partnership dated October 2021.

### **1.3.8 Documents Prepared by Stephen Reid Consulting Traffic and Transportation**

- An *Outline Workplace Travel Plan/Modal Shift Report* prepared by Stephen Reid Consulting Traffic and Transportation dated October 2021.
- A *Traffic Inputs to RFI Response* prepared by Stephen Reid Consulting Traffic and Transportation dated October 2021.

## 2.0 RESPONSE TO FURTHER INFORMATION REQUEST

The Planning Authority set out the following:

### 2.1 Item No. 1: Department of Defence Flight Procedures

#### Item No. 1 states:

*'The Department of Defence has objected to the proposal on the grounds that the International Civil Aviation Organisation (ICAO) that set standards and practices on aviation have noted that Annex 14 will be impacted. Annex 14 deals with airport surfaces and its protection to ensure safe instrument flight procedures and specifically Obstacle Limitation Surfaces (OLS) that identifies the airspace around the aerodrome that is to remain free of obstacles. The Planning Authority notes the serious concerns of the Department of Defence and the south east portion of the proposed development. The applicant is requested to liaise with the Department of Defence to seek a means to progress development on this site and demonstrate compliance with the South Dublin County Development Plan 2016-2022.'*

#### 2.1.1 The Applicant's Response to Item No. 1

The Department of Defence had expressed concern that the proposed warehouse should not project above any of Casement Aerodrome's 'Obstacle Limitation Surfaces' – in particular the Approach Surface to Runway 04, the Take-off Climb Surface to Runway 22, and the Transitional Surface north-west of Runways 04/22.

To fully assess this concern, an *Aviation Safety Assessment Report [Additional Information]* report prepared by O'Dwyer and Jones Design Partnership has been prepared and included with this *Response to Request for Further Information* which concludes:

*'...we can confirm that no part of the proposed Warehouse will lie under the Take-off Climb Surface from Runway 22, or under a full-width 'instrument' Approach Surface (at 2% slope) to Casement's Runway 04. The two Obstacle Limitation Surfaces which will lie above the proposed Warehouse are:*

- (i) the Transitional Surface to north-west of Casement Runways 04/22; and*
- (ii) Casement Aerodrome's Inner Horizontal Surface.*

*Taking into account the building's FFL at exactly 2m lower than Threshold 04, and its revised height, and its exact (revised) distance from Runway 04/22, we confirm —(i) that the Transitional Surface to 04/22 will lie at exactly 0.68m above the highest point of the building's east corner, and this Surface will rise from that level to 21.55m above the building; and we confirm (ii) that the aerodrome's Inner Horizontal Surface will lie above the west side of the building at 21.55m above its roof and parapets. The building will not project above either of these Surfaces (or above any 'Surface').'* [Declan O' Dwyer's Emphasis]

The *Aviation Safety Assessment Report [Additional Information]* demonstrates full compliance with all aviation and aeronautical requirements affecting the site. A copy of the full Response to this item as prepared by O'Dwyer and Jones Design Partnership has been submitted to the Department of Defence Property Management Branch, and to the IAA.

## 2.2 Item No. 2: Relocation and Redesign of Warehouse Development

### Item No. 2 states:

*The proposed warehouse at 22,966 sq.m, standing approximately 16 metres tall would be visible from the R120 on approach to Newcastle Village from the N7 (southern elevation). The subject site is located on the edge of the existing industrial area and interfaces with the rural area to the south and east. In this instance the Planning Authority considers that design proposals to transition the industrial area into rural lands should be introduced along the southern and eastern boundaries. The applicant is requested to submit revised drawings demonstrating the following:*

- 1. The relocation of the overall structure away from the southern boundary of the site (in a northerly direction)*
- 2. An increased natural buffer zone along the entire southern and south-eastern boundaries of the site, which shall include earthen berms and significant, increased planting. This is to mitigate the impact of the proposed development at this important interface.*
- 3. A redesigned southern façade of the structure should be investigated and submitted, which should include a complete change in proposed materials from that proposed for the warehousing element and should include a green wall/façade to enhance and complement the berm and increased planting required under item 2 above.*
- 4. Include CGIs of revised proposal*

### 2.2.1 Response to Item 2 (1)

The proposed development has been subject to extensive modifications to address the concerns of the Planning Authority.

Extracts from the Previously Proposed Site Plan and the Now Proposed Site Plan have been included below which show the relocation of the proposed warehouse structure away from the southern boundary in a northerly direction. An increase in the distance from the southern boundary is noticeable with an increase in the proposed separation distance to the boundary from 10.5m to 23.3m, as shown below:

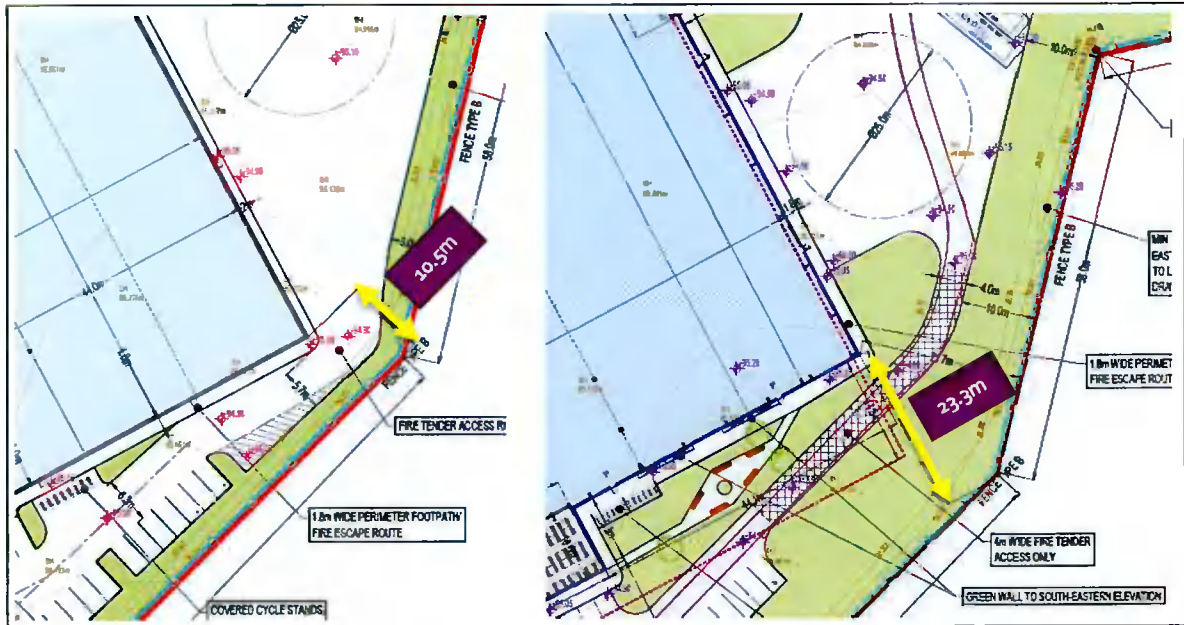


Figure 2.1: Extract from the Previously Proposed Site Plan (Left) and the Now Proposed Site Plan (Right)

Source: Kavanagh Burke Consulting Engineers, Annotated by Thornton O'Connor Town Planning, 2021

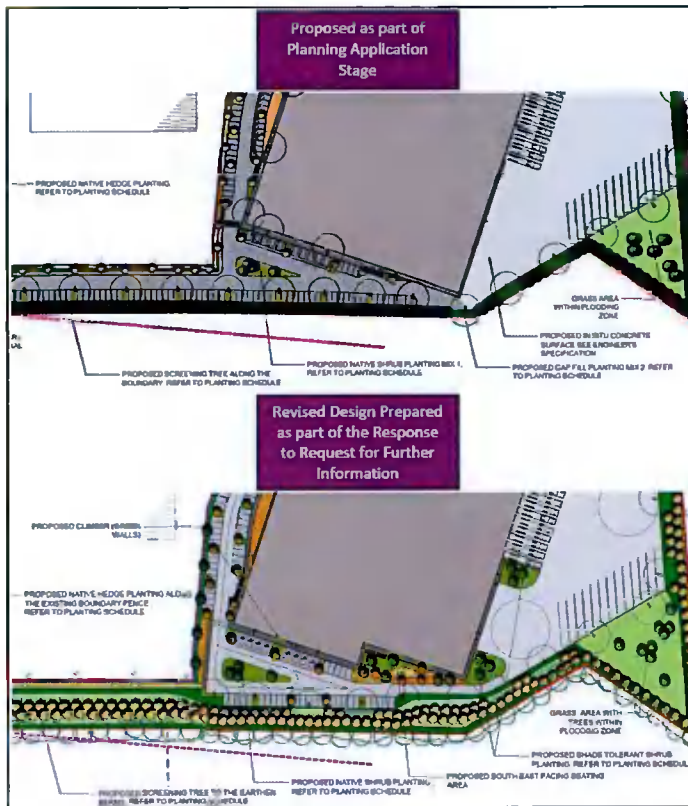
### 2.2.2 Response to Item 2 (2)

Please refer to Figure 2.2 and Figure 2.3 below which provide extracts from the previously proposed Landscape Masterplan and the now proposed Landscape Masterplan which has significantly extended planted buffer zones. In JBA Consulting's design statement provided with their revised Landscape Masterplan, they state:

*'Along the southern boundary native hedge planting with trees are proposed, to provide more screening and filter views to the adjacent buildings.'*

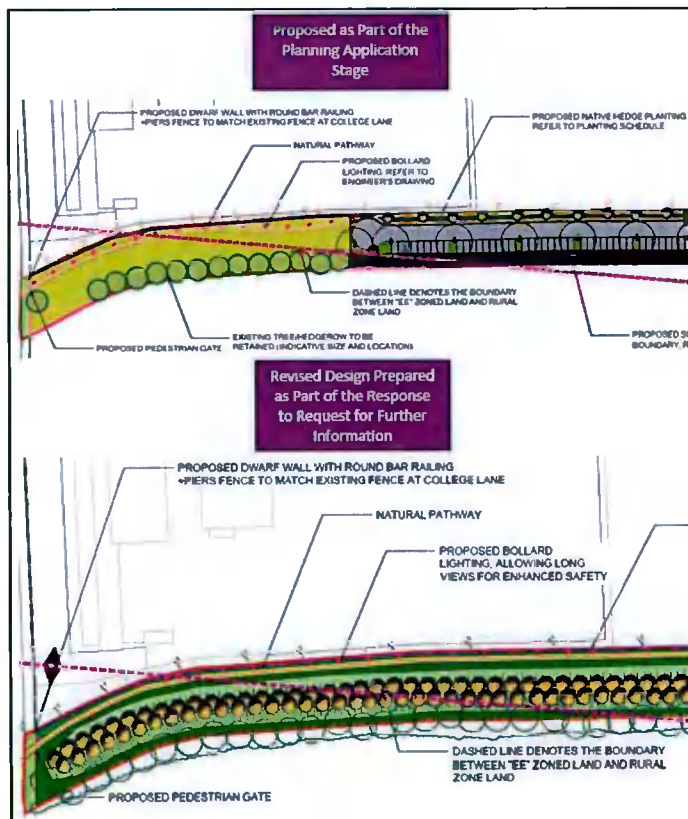
The southern, eastern and northern boundaries of the proposed development will be provided with a dense planted transition strip creating a strong green boundary between the adjoining agricultural lands and the subject warehousing facility. In particular, the southern boundary has been given specific attention by the Design Team as part of this *Response to Request for Further Information* where dense planting and raised earth berms are provided to soften the transition line. The southern boundary landscaping strip has been increased to provide a consistent 10m zone forming the transition from the 'EE' zoned lands to the rural lands to the south.





**Figure 2.2:**  
Extract from the Previously Proposed Landscape Masterplan (Top) and the Now Proposed Landscape Masterplan (Bottom)

Source:  
JBA Consulting, 2021



**Figure 2.3:**  
Extract from the Previously Proposed Landscape Masterplan (Top) and the Now Proposed Landscape Masterplan (Bottom)

Source:  
JBA Consulting, 2021

**2.2.3 Response to Item 2 (3)**

The southern façade of the structure has been subject to a substantial redesign to address the concerns of the Planning Authority. The changes to the façade are documented in the revised *Design Statement* prepared by Kavanagh Burke Consulting Engineers. The Design Statement includes reference to the following changes:

*'The southern elevation finishes have been updated at this additional information stage with the introduction of ceramic granite surrounds to curtain walling panels while adjacent composite insulated flat panel sections will be interrupted by the introduction of green wall panel placed immediately adjacent to the cladding.'*

It is considered that the green wall now proposed in response to the request by the Planning Authority is successful in enhancing and complementing the increased planting provided in the site.

**2.2.4 Response to Item 2 (4)**

An updated set of Verified View Montages prepared by Digital Dimesnions is enclosed with this *Response to Request for Further Information*. The views also include 2 No. new CGI's prepared for the *Request for Further Information* stage of the application to demonstrate the high quality design of the Southern elevation. One of the CGI's has been provided below for reference and shows the location of green walls and extensive landscaping which will assist in assimilating the proposed development into the subject site.



**Figure 2.4: CGI of Proposed Front (Southern) Elevation**

**Source: Digital Dimensions, 2021**

## 2.3 Item No. 3: Revised Design Statement

### Item No. 3 states:

*'The bulk, scale and massing of the building is considered to be extensive for the subject site, and it fills a significant area of the entire 5 hectare site, with minimal 'greening' and substantial hard-surfacing of the site, creating a cramped development which may be considered to be an overdevelopment of the site. The planning authority requests that a justification and a rationale for the size, bulk and scale of the proposed building on site be submitted. Notwithstanding this, revised proposals for a scaled down structure on the site should be submitted. A revised Design Statement is required (in accordance with Section 11.21 of the County Development Plan).'*

### 2.3.1 Response to Item No. 3

As detailed in Section 1.2 above, extensive design changes are proposed to address the concerns of the Planning Authority. The changes include the reduction and scaling down of the floor area from 22,966 sq m to 22,020 sq m, and also the reduction in the proposed height of the warehouse by 1 metre.

As demonstrated in the enclosed Landscape Masterplan, significant efforts have been made to increase the greening of the site with larger planted buffer zones and intermittent tree planting (every 5 No. car parking spaces) within the scheme. The additional planting, will in combination with green walls proposed, ensure that the warehouse scheme is not legible as a hard surfaced environment but instead is legible as a high quality designed warehouse scheme.

Whilst the scale of the unit is now reduced, the large scale unit proposed has been designed to meet the demand within the industry of warehouse floorplates of a suitable scale as a new trend has emerged with modern operators requiring warehouses with larger floor plates and greater internal heights. We respectfully submit that the subject Enterprise and Employment zoned lands within an established and designed Business Park environment with ease of access to the National Road network is the appropriate location for large scale warehousing. In addition, we note that South Dublin County Council have previously considered warehouses of a similar scale to be appropriate within the locale. One such example is SDCC Reg. Ref.: SD18A/0265 which relates to a site at College Lane in Greenogue and received a Final Grant of Permission on the 13<sup>th</sup> May 2019. As part of that planning application, Building B was permitted with 26,384 sq m of commercial floorspace comprising of 23,421 sq m of warehouse area and 1,870 sq m of ancillary office area. Whilst the site area of 9.637 Ha was larger than that of the subject site, the application also included another warehouse (warehouse A) with an area of 15,286 sq m and the site coverage of 43.3% provided by the two warehouses was considered acceptable. Another permitted warehousing development in the immediate local area was granted in accordance with Reg. Ref. SD20A/0258. The application as permitted comprised 3 No. warehouses with a total Gross Floor Area of 21,104 sq m on a site area of 5.18 ha and a resultant permitted Site Coverage of 40.7%.

In comparison, the subject application as initially lodged proposed a Gross Floor Area of 22,996 sq m on a site area of 5.67 Ha with a resultant Site Coverage of 41%. The reduction in the scale of the scheme as proposed in this Response to Request for Further Information reduces the proposed Site Coverage to 38.8%. As aforementioned, there is been a significant increase to the planting zones in tandem with the reduction in Site Coverage proposed to address the concerns of the Planning Authority.

In our professional town planning opinion, the scale of the site (5.67 Ha) in tandem with the provision of extensive landscaping and careful positioning of the warehouse renders the site subject to this *Response to Further Information Request* suitable to absorb a warehouse of the scale proposed.

## 2.4 Item No. 4: Proposed Vehicular Movements and Parking

### Item No. 4 states:

*'The applicant is requested to submit:*

- (1) an operational management plan which should include no. of HGVs making deliveries to and from the proposed development during the operational phase of the proposed development.*
- (2) a detail design of proposed vehicular access from Jordanstown Road, visibility splays shall be demonstrated at the proposed vehicular access.*
- (3) a robust justification for the quantum of car parking proposed on site having regard to the close proximity of the site to public transport links. The applicant should 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.*
- (4) a revised layout showing 1.8m wide pedestrian footpath along the northern and eastern perimeter of the warehouse connecting the fire escape doors to the safe assembly zones and a 2m width concrete footpath on the southern side of the new access road from Jordanstown Road.*
- (5) a swept path analysis for fire tenders and HGVs showing access to all required locations of the site needs to be submitted and agreed by the roads department.*
- (6) a drawing illustrating that all bicycle parking spaces shall be covered. From a design perspective the parking should be demonstrated to comply with the car parking standards of the CDP, which requires increased planting of trees between car parking spaces.*

### 2.4.1 Response to Item No. 4 (1)

A *Traffic Inputs to RFI Response* document prepared by Stephen Reid Consulting Traffic and Transportation is enclosed with this *Response to Request for Further Information*. Within this document, a breakdown is provided of the number of HGVs making deliveries to and from the proposed development during the operational phase. Item 4(1) of the response concludes that:

*'In summary, the proposed development would be expected to generate in the order of 910 vehicle movements per day (assuming 405 vehicle arrivals and 405 vehicle departures), see Tables 1 and 2.*

*In terms of commercial vehicles, there would be in the order of 128 LGV movements per day (vans) and 242 HGV movements per day i.e. 64 van arrivals and 121 HGV arrivals, and the same number of departures.*

*The tables demonstrate that the HGV and van movements will be relatively evenly spread across the core daytime period, with a typical range of 5-8 vans and 6-10 HGVs each way per hour.'*