

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

PR/1452/21

Reg. Reference: SD21A/0158 **Application Date:** 15-Jun-2021
Submission Type: Additional **Registration Date:** 12-Oct-2021
Information

Correspondence Name and Address: Maurice O'Neill, Module Architecture 1st Floor, 2 Chapel Hill, Lucan, Co. Dublin, K78 A6P7

Proposed Development: Erection of 2 two storey industrial units adjacent to existing S1 unit comprising of warehouse, office and toilet at ground floor level and proposed storage to mezzanine floor level; alterations to external area/existing car park and all associated site works.

Location: Unit S1, Ballymount Drive, Ballymount Industrial Estate, Dublin 12

Applicant Name: Alan & Monica Holmes

Application Type: Permission

(SW)

Description of site and surroundings

Site Area: stated as 0.2 Hectares.

Site Description:

The site is a vacant parcel of land located immediately adjacent to an industrial unit, located within an industrial estate.

Proposal:

- Erection of 2 two storey industrial units adjacent to existing S1 unit comprising of warehouse, office and toilet at ground floor level and proposed storage to mezzanine floor level; alterations to external area/existing car park and all associated site works.

Zoning

The site is subject to zoning objective 'REGEN' – 'To facilitate enterprise and/or residential-led regeneration'.

Consultations

EHO - no objections subject to conditions

Irish Water – additional information requested

Roads – no objections subject to conditions

Development Plans – no objection.

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

SEA – no overlap indicated.

Submissions/Observations /Representations

None.

Relevant Planning History

Subject site:

SD08A/0805 Two storey extension to the north gable end of existing industrial units. The extension will comprise two separate warehouse units, each with 100sq.m warehouse floor space and 22sq.m of ancillary office space: the gross internal floor space to be provided is 244sq.m. The overall height of the development is 7.3m. **Permission Granted.**

Relevant Enforcement History

None recorded.

Pre-Planning Consultation

None recorded.

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

CS6 SLO 1:

To initiate a plan led approach to the sustainable regeneration of the brownfield lands in the Naas Road/Ballymount REGEN zoned lands. The plan led approach will include the preparation of a masterplan in 2019 with a view to preparing a Local Area Plan or other appropriate mechanism for the Regeneration (REGEN) and Local Centre (LC) at Walkinstown zoned lands. The masterplan will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework Plan (2010).

Chapter 4 Economic Development & Tourism

4.1.1 *Employment:*

- *A series of older industrial areas along the Luas Corridor, at Naas Road, Ballymount and Cookstown accommodate a diverse range of small and medium sized enterprises and industries. These areas, although large employment centres, are facing issues of evolutionary renewal. The Council will seek to support the regeneration of older industrial areas on a phased basis by promoting more intensive enterprise and/or residential led development at locations proximate to town centres and transport nodes.*

Section 4.2.0 Strategic Policy for Employment

Policy ET1 Economic and Tourism Overarching Policies and Objectives

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

Section 6.4.4 Car Parking

Policy TM7 Car Parking

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Section 7.1.0 Water Supply & Wastewater
Policy IE1 Water & Wastewater

Section 7.2.0 Surface Water & Groundwater
Policy IE2 Surface Water & Groundwater

Section 7.3.0 Flood Risk Management
Policy IE3 Flood Risk

Section 7.5.1 Waste and Resource Policy and Legislation
Policy IE5 Waste Management

Section 9.3.1 Natura 2000 Sites
Policy HCL12 Natura 2000 Sites

Section 10.0 Energy
Policy E3 Energy Performance in Existing Buildings
Policy E4 Energy Performance in New Buildings

Chapter 11 Implementation
Section 11.2.1 Design Statements
Section 11.2.4 Regeneration Zone
Section 11.3.6 Retail Development
(i) Retail Criteria
Table 11.4 Regen zoning objective

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 11.6.1 (i) Flood Risk Assessment
Section 11.6.1 (ii) Surface Water
Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)
Section 11.6.1 (iv) Groundwater
Section 11.6.1 (v) Rainwater Harvesting
Section 11.6.1 (vi) Water Services
Section 11.6.3 Environmental Hazard Management
Section 11.6.3 (i) Air Quality
Section 11.6.3 (ii) Noise

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Section 11.6.3 (iii) Lighting
Section 11.6.4 Major Accidents – Seveso Sites
Section 11.6.5 Waste Management

Section 11.7.2 Energy Performance In New Buildings
Section 11.8.1 Environmental Impact Assessment
Section 11.8.2 Appropriate Assessment

Relevant Government Policy

Retail Design Manual - A Good Practice Guide, Department of Arts, Heritage and the Gaeltacht (2012)

Towards Nearly Zero Energy Building in Ireland – Planning for 2020 and Beyond, Department of the Environment, Community and Local Government (2012)

Design Manual for Urban Roads and Streets 2019- Department of Housing, Planning and local Government (2019)

Transport Strategy for the Greater Dublin Area, 2016-2035, National Transport Authority
Spatial Planning and National Roads, Guidelines for Planning Authorities 2012 – National Roads Authority

Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020, Department of Transport, (2009)

National Cycle Manual – National Transport Authority (2011)

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

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

Assessment

The main issues for assessment are:

- Zoning and Council Policy
- Residential and Visual Amenity
- Services and Drainage
- Access and Parking
- Screening for Appropriate Assessment
- Environmental Impact Assessment

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Zoning and Council Policy

The site is subject to zoning objective 'REGEN' – 'To facilitate enterprise and/or residential-led regeneration'. The applicant has stated on the application form that the existing use is office/storage/showrooms. Warehouses are open for consideration in accordance with the County Development Plan (CDP) land use zoning matrix.

Paragraph 4.1.1 of the County Development Plan states:

"The Council will seek to support the regeneration of older industrial areas on a phased basis by promoting more intensive enterprise and/or residential led development at locations proximate to town centres and transport nodes".

It is not apparent that the proposal would support the wider regeneration of the area. However, it is noted that the proposal would be located immediately adjacent to existing units. The application site is located within the Naas Road masterplan area. Development Planning has been consulted and has stated *"Given the nature and scale of the proposed development and the fact that the development will not be a stand-alone building and is integrated with surrounding uses, it is considered that the principle of increased industrial use development at this specific location will not compromise the vision or the development of the Naas Road masterplan"*. The Planning Authority concurs with this statement.

It is therefore considered that the principle of the proposed development is acceptable.

Residential and Visual Amenity

The application site is not close to any residential properties. The EHO has raised no objections subject to conditions.

In terms of visual amenity, the proposed development would retain the existing building line, but would be marginally higher at 7.3m. Overall, the proposal is of a similar height and scale to those that received planning permission under SD08A/0805 (7.3m in height). The impact on visual amenity is considered acceptable.

Services and Drainage

Water Services has requested additional information regarding SuDS. Irish Water has requested additional information regarding distance from watermain and the foul sewer. Given the nature of the request, it is considered **additional information** is required in this instance.

Access and Parking

Roads has no objections, subject to conditions. Given additional information is requested regarding services, it is considered the matters raised by roads should also be addressed via **additional information**.

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Screening for Environmental Impact Assessment

Having regard to the modest nature of the proposed 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.

Screening for Appropriate Assessment

The applicant has not provided information to assist the screening for Appropriate Assessment. Having regard to the nature of the development, connection to public services and the distance from the Natura 2000 sites the proposed development would not require a Stage 2 Appropriate Assessment.

Other Considerations

Development Contributions

Additional warehouse – 312.54sq.m

Monitoring for Strategic Environmental Assessment

Building Use Type Proposed Industrial

Floor Area (sq. m) 312.54

Land Type Brownfield/Urban Consolidation

Site Area (ha) 0.2

Conclusion

Having regard to the 'REGEN' zoning objective of the site, and the nature and scale of the proposed development, it is considered that the proposal is acceptable in principle and the design is also acceptable, however, additional information is required regarding proximity to pipes and other matters to ensure the proposal would accord with the South Dublin County Council Development Plan 2016-2022.

Recommendation

Request Further Information.

Further Information

Further information was requested on 9 August 2021

Further Information was received on 12 October 2021

Consultations:

Parks and Public Realm: No further comments.

Irish Water: Request clarification of additional information.

Roads:

Water Services: Request clarification of additional information.

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Item 1:

The applicant is requested to submit a drawing and report to show what SuDS (Sustainable Drainage Systems) are proposed for the development. Examples of SuDS are permeable paving, swale/s, filter drains and other such SuDS.

The applicant has provided a drainage report, prepared by ONCE Engineers. This states that attenuation tanks are proposed.

Assessment:

Water Services has requested a drawing indicating what SuDS are proposed for the development and has stated "*Examples of SuDS are permeable paving , swale/s, filter drains grasscrete or grass paving and other such SuDS. Particular areas where SuDS is an option is in parking area and where a footpath is proposed. The hard standing surface could be changed to a SuDS type surface*".

It is also stated that a concrete attenuation tank should not be used. Instead an arched type attenuation system should be used.

In accordance with Paragraph 11.6.1(iii) of the County Development Plan, 'In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems (SUDS). SUDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakaways and green roofs. In some exceptional cases and at the discretion of the Planning Authority, where it is demonstrated that SUDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort'. The applicant is requested to omit the proposed attenuation tank and provide sufficient SUDS, unless it can be demonstrated that SUDS are not feasible.

The response to Item 1 is not satisfactory. Clarification of additional information is therefore requested to provide more SuDS for the proposed development. An attenuation tank would only be accepted where it has been demonstrated that SuDS are not feasible. If an attenuation tank is proposed, it should be an arched type attenuation system. Notwithstanding this, natural solutions should be sought.

Item 2:

The applicant is requested to submit a drawing in plan and cross-sectional view showing the distance between the proposed foundation of boundary wall and the outside diameter of existing watermain. This should be shown at the narrowest point between proposed foundation and existing watermain north of site. The applicant should note setback distance requirements of Irish Water.

Details have been provided on drawing 5308-C01.

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Assessment:

Water Services and Irish Water have not raised any objections to this element of the submission. It is therefore considered that the information submitted is acceptable.

Item 3:

The applicant is requested to submit a drawing in plan and cross-sectional view showing the distance between the proposed foundation of boundary wall and the outside diameter of existing 225mm foul sewer north of site. This should be shown at the narrowest point between proposed foundation and existing 225mm foul sewer north of site. The applicant should note setback distance requirements of Irish Water.

Details have been provided on drawing 5308-C01.

Assessment:

Water Services and Irish Water have not raised any objections to this element of the submission. It is therefore considered that the information submitted is acceptable.

Item 4:

The applicant is requested to submit a pre-connection enquiry with Irish Water. Details of this should be submitted as additional information.

Application cover letter states a PCE has been submitted.

Assessment:

Irish Water has requested **clarification** as follows:

- Clarify response from Irish Water regarding pre connection enquiry with Irish Water (for water) or alternatively submit a letter of confirmation of feasibility of proposed development from Irish Water.
- Clarify response from Irish Water regarding pre connection enquiry with Irish Water (foul) or alternatively submit a letter of confirmation of feasibility of proposed development from Irish Water.

The response to Item 4 is not satisfactory. Clarification should be sought.

Item 5:

The applicant is requested to submit:

(a) a revised layout in plan and elevation view showing, fire exist doors for each warehouse with a concrete footpath of minimum 1m width and maximum 1.8m width linking the east west side of the development in the north direction.

(b) a revised layout showing 10% of staff car parking spaces equipped with operational electrical charging points.

Details are provided on dwgs P101, P102, P200 and P301.

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

Assessment:

The Roads Department has stated that they are satisfied with the submission. This is considered acceptable. Conditions are recommended in event of grant.

Other Considerations

Development Contributions

Additional warehouse – 312.54sq.m

Monitoring for Strategic Environmental Assessment

Building Use Type Proposed Industrial

Floor Area (sq. m) 312.54

Land Type Brownfield/Urban Consolidation

Site Area (ha) 0.2

Conclusion

Having regard to the 'REGEN' zoning objective of the site, and the nature and scale of the proposed development, it is considered that the proposal is acceptable in principle and the design is also acceptable, however, **clarification of additional information** is required regarding surface water attenuation and confirmation of feasibility from Irish Water to ensure the proposal would accord with the South Dublin County Council Development Plan 2016-2022.

Recommendation

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

1. The applicant's response to Item 1 of the Additional Information request is not considered to be satisfactory. The Planning Authority requests that the applicant submit:
 - (i) Revised proposals for water attenuation on the site that can be demonstrated to be in accordance with policy and objectives set out both in Chapters 7 and 8 of the current County Development Plan.
 - (ii) The revised proposals should incorporate natural solutions and include significant SUDS elements and should demonstrate that they are in accordance with Paragraph 11.6.1(iii) of the County Development Plan, 'In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems (SUDS). SUDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakaways and green roofs.
 - (iii) A fully detailed SUDS report that clearly details County Development Plan policies and objectives and how the proposed development demonstrates compliance with same.
 - (iv) The applicant should note that the undergrounding of attenuation will only be considered where it can be demonstrated that there are no other viable alternative solutions and will only be considered as a last resort. The applicant is requested to omit the proposed attenuation tank and provide sufficient SUDS. (If an attenuation tank is proposed, it should be an arched type attenuation system).
 - (v) The applicant is requested to provide a drawing indicating what SuDS are proposed for

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

the development. Examples of SuDS are permeable paving , swale/s, filter drains grasscrete or grass paving and other such SuDS. Particular areas where SuDS may be feasible are within parking area and where a footpath is proposed, e.g. the hard standing surface could be changed to a SuDS type surface.

2. The applicant is requested to:
 - Clarify response from Irish Water regarding pre connection enquiry with Irish Water (for water) or alternatively submit a letter of confirmation of feasibility of proposed development from Irish Water.
 - Clarify response from Irish Water regarding pre connection enquiry with Irish Water (foul) or alternatively submit a letter of confirmation of feasibility of proposed development from Irish Water.

Comhairle Chontae Atha Cliath Theas

Record of Executive Business and Chief Executive's Order

REG. REF. SD21A/0158

LOCATION: Unit S1, Ballymount Drive, Ballymount Industrial Estate, Dublin 12



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

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

Dated:

9/11/21



Eoin Burke, Senior Planner