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Response to a Request for Further Information

In respect of a Warehouse Development at

**Site C, College Lane, Greenogue, Rathcoole, Co.
Dublin**

Submitted on Behalf of

Jordanstown Properties Limited

November 2021

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THORNTON O'CONNOR
TOWN PLANNING

Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24
D14 YNN5



Friday, 5th November 2021

Dear Sir/Madam

RE: RESPONSE TO A REQUEST FOR FURTHER INFORMATION IN RESPECT OF AN APPLICATION FOR A WAREHOUSE DEVELOPMENT AT A SITE KNOWN AS SITE C, COLLEGE LANE, GREENOGUE, RATHCOOLE, CO. DUBLIN

South Dublin County Council Reg. Ref.: SD21A/0200

1.0 INTRODUCTION

1.1 Response to Request for Further Information by South Dublin County Council

This letter is submitted by Thornton O'Connor Town Planning¹ on behalf of Jordanstown Properties Limited² in response to a *Request for Further Information* issued by South Dublin County Council, dated 9th September 2021 in respect of a warehouse development comprising 1 No. warehouse at Site C, College Lane, Greenogue, 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 Engineers³, JBA Consulting⁴, Stephen Reid Consulting Traffic and Transportation⁵, Digital Dimensions⁶, Arbor-Care (Ltd) Professional Consulting Tree Service⁷, Axiseng Consulting Engineers⁸ and O'Dwyer and Jones Design Partnership⁹.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14.

² Greenogue Plaza, Greenogue Industrial Estate, Rathcoole, Co. Dublin.

³ Unit F3, Calmount Park, Ballymount, Dublin 12.

⁴ Unit 8, Block 660, Greenogue Business Plaza, Greenogue Business Park, Rathcoole, Dublin, D24 YN81.

⁵ Estuary House, New St, Malahide, Co. Dublin.

⁶ 1 Rathmines Rd Upper, Rathmines, Dublin 6, Do6 Y5P5.

⁷ Friarstown, Grange, Co. Limerick

⁸ 47 Mount Street Upper, Dublin, Do2 AC95.

⁹ 28 Leeson Park, Dublin 6, Do6E338.

1.2 An Overview of the Warehouse Occupier - Uniphar

The purpose of this Section of the Report is to provide South Dublin County Council with a greater understanding of the occupier of proposed warehouse and to detail their operations.

The modifications proposed to the permitted warehouse at Site C are to meet the particular requirements of Uniphar who will occupy the proposed facility. Uniphar are currently based at Citywest Business Campus and urgently need to expand to accommodate the growing demand for pharmaceuticals. Uniphar would prefer to keep the expansion of their operations within the functional area of South Dublin County Council and more specifically to expand in a location that is as close as possible to their existing facility and also has excellent access to the national road network. Uniphar have undertaken an extensive site selection process as part of their planned expansion and as they require considerable floorspace and height to meet their requirements, the permitted warehouse at Site C, albeit with some modifications as proposed, was deemed to be the most suitable site from a planning perspective to meet their needs. It is understood that South Dublin County Council have some concerns regarding the initial proposal submitted and thus to ensure that the concerns are robustly addressed, Uniphar's organisational strategy for expansion has been amended with the extent of office floor space at Site C proposed to be reduced.

The importance of the Uniphar's expansion needs to be fully understood and justified. Uniphar Group have advised that they have outgrown their existing premises (built in 2009) at Citywest Business Campus which can no longer (on its own) meet the needs of the growing market. As people are living longer, Ireland's population is trending towards that of an ageing population, which 'is set to accelerate over the medium- and longer-term,' according to the *Population Ageing and the Public Finances in Ireland Report*²⁰ published by the Department of Finance on the 17th September 2021. Below, some information is provided which demonstrates Uniphar Group's growing role in Ireland:

- Uniphar Group are a key element of the national health infrastructure holding over 13,000 No. items in cold and ambient storage providing twice-daily delivery to Ireland's 2,000 pharmacies.
- Uniphar Group supplies 53% of all medicine volume into Hospital and Community Pharmacy and its current Citywest site is a key part of Ireland's National Health Infrastructure.
- Uniphar Group has dramatically doubled its wholesale market share in Ireland in the last 10 years.

Ireland's population is projected to be between 6m to 7m by 2050²¹ with a huge increase forecast on the eastern seaboard. An ageing population will undoubtedly result in a growing demand being placed on healthcare nationally which our Client, Uniphar Group, will play a key role in meeting. Uniphar Group need to urgently to expand their capacity enabling them to provide an essential service for which, the delivery of the amended warehouse subject to this application is crucial.

²⁰ <https://www.gov.ie/en/publication/6ba73-population-ageing-and-the-public-finances-in-ireland/>

²¹ <https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2017-2051/populationprojectionsresults/>

The need for significant floor to ceiling heights which are already permitted at the Site C warehouse will allow for the delivery of a facility that allows for the provision of an advanced picking system that can significantly increase the capacity of the warehouse allowing Uniphar to be able to plan for the continued increasing demand of the healthcare system. Images of the existing premises in Citywest have been provided below.



Figure 1.1:
Uniphar Group
Citywest Facility
 Source:
Thornton O'Connor
Town Planning

1.3 Key Design Changes Proposed to Respond to the Concerns of South Dublin County Council

The scheme as lodged with the Planning Authority has been subject to modifications to comprehensively 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:

Layout/ Architecturally related:

- The 3 No. storey ancillary office & staff facilities on the north-western portion is now removed and an accessible core (stairs & lift) has been added. The overall office area before RFI changes was 2,437 sq m, the revised layout now amounts to 776 sq m of ancillary office area. The overall staff facilities area previously proposed was 2,582 sq m and the revised layout now amounts to 1,616 sq m.
- The overall Gross Floor Area before the *Request for Further Information* changes was 29,438 sq m, the revised building now proposes a reduced Gross Floor Area of 27,683sq m (i.e., a reduction of 1,755 sq m).
- The entire carpark portion along the western side was revised and the previously proposed multistorey car park was removed. The scheme originally proposed 190 No. car parking spaces and now proposes 87 No. car parking spaces including 10 No. Electric Vehicle parking spaces.
- The bicycle park previously included 72 No. spaces and now proposes 124 No. covered cycle spaces.
- New landscape areas have been added including intermittent tree planting every 5 No. carpark spaces and greened zones have been increased on south-western portion as shown on site plan to show more "green" boundaries on these sides.
- Following the new layout, green walls have been provided on the elevations at multiple locations around the building to show more green areas within the overall site.
- The footpath around the building has been increased to 1.8m.

Drainage and Landscape related:

- Storm water network and attenuation tank layout altered to suit the new site layout after the removal of the multi storey car park and addition of a new sprinkler tank.
- A green roof to the north western portion of the warehouse has been added as a SuDS measure.
- Green/living walls have been provided at multiple locations on the elevations as a SuDS measure.
- Proposed permeable paving provided to the van parking and circulation areas.
- Staff and visitor's car parks are now proposed to be surfaced with permeable paving and parking bays to be surfaced with grasscrete to allow for "at source" water disposal and to increase the quantum of green areas (the distributor road and disabled car parking are to be finished with open texture macadam to allow for infiltration at source as grasscrete is not suitable for these areas).
- A SuDS/infiltration tree detail has been added into the car park design to allow surface water to flow into the tree pits.

- Irrigation tree pits are to be installed across the site car park as per the landscape architect layout to intercept any residual runoff from open texture macadam.
- New landscaped areas have been added with planting around the perimeter of the site also proposed, especially along the southern boundary.
- The revised scheme also provides an embankment (1:3 in gradient) for long term stability totalling 0.7m in height. This embankment has been planted with semi-mature native trees, and understorey native shrub planting (whips), to provide visual screening and to enhance biodiversity.

1.4 Documents Enclosed

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

1.4.1 Planning

- This Planning Response Letter prepared by Thornton O'Connor Town Planning dated November 2021.

1.4.2 Documents Prepared by Kavanagh Burke Consulting Engineers

- Drainage Design Report dated November 2021;
- The following drawings have also been prepared:

Kavanagh Burke Consulting Engineers		
Drawing No.	Drawing Title	Scale
D1658 GA-A01	Ground Floor Plan	1:200
D1658 GA-A02	First Floor Plan	1:200
D1658 GA-A03	Second Floor Plan Mezzanine Level 01	1:200
D1658 GA-A04	Third Floor Plan Mezzanine Level 02	1:200
D1658 GA-A05	Fourth Floor Plan	1:200
D1658 GA-A06	Mezzanine Office and Dock Office	1:100
D1658 GA-A07	Architectural Sections	1:200
D1658 GA-A08	Elevations	1:200
D1658 GA-A09	Contiguous Elevations	1:500
D1658 GA-A10	Covered Bike Park	1:50
D1658 D2	Site Plan with Swept Paths	1:500
D1658 D3	Drawing and Watermain Layout	1:500

1.4.3 Drawings Prepared by JBA Consulting

- The following drawings have been prepared:

JBA Consulting		
Drawing No.	Drawing Title	Scale
CER-JBAI-XX-XX-DR-L-0003	Section Plans	As shown

CER-JBAI-XX-XX-DR-L-0004	Planting Plan	1:500
CER-JBAI-XX-XX-DR-L-0002	Landscape Masterplan	1:500

1.4.4 Drawings Prepared by Arbor-Care (Ltd) Professional Consulting Tree Service

- An *Arboricultural Impact Assessment* prepared by Arbor-Care (Ltd) Professional Consulting Tree Service dated October 2021;
- The following drawings have also been prepared:

Arbor-Care (Ltd) Professional Consulting Tree Service		
Drawing No.	Drawing Title	Scale
JPP-TPP-001	Tree Protection Plan	1:500

1.4.5 Drawings Prepared by Axiseng Consulting Engineers

- Part L Compliance Report prepared by Axiseng Consulting Engineers dated October 2021; and
- The following drawings have also been prepared:

Axiseng Consulting Engineers		
Drawing No.	Drawing Title	Scale
UWBC-AXE-XX-00-DR-ME-60102	Site Lighting Drawing	1:500

1.4.6 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.

1.4.7 Documents Prepared by Stephen Reid Consulting Traffic and Transportation

- An *Inputs to RFI Response* document 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 items requiring additional information:

2.1 Item No. 1

Item No. 1 states:

'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.'

2.1.1 Response to Item No. 1 (1) –

To ensure concerns raised by South Dublin County Council in their *Request for Further Information* are comprehensively addressed, Uniphar has amended their planned organizational strategy in order to reduce the number of staff that will be based at the Site C warehouse, which results in a reduction in the extent of ancillary office floorspace and a reduction in the extent of car parking proposed.

The changes to the areas of the scheme, including a comparison with the extant permission at the site (SD19A/0407) and the now proposed scheme prepared as part of this *Request for Further Information Response* are detailed in the table below:

Breakdown of Proposed Accommodation and Parking Provision	Previously Permitted SD19A/0407	Proposed for Planning Application Stage SD21A/0020	Proposed SD21A/0200 RFI Response	Proposed SD21A/0200 RFI Response v SD19A/0407 (i.e. change from extant to now proposed)
Warehouse	12,339 sq m	13,353 sq m	14,225 sq m	+1,856 sq m
Staff Facilities	548 sq m	2,582 sq m	1,616 sq m	+1,068 sq m
Ancillary Office	1,042 sq m	2,437 sq m	776 sq m	-266 sq m
Warehouse Mezzanines (Racking)	-	9,703 sq m	9,703 sq m	+9,703 sq m
Plant Room/ Plant Area	-	1,363 sq m	1,363 sq m	+1,363 sq m
Total Areas	13,959 sq m	29,438 sq m	27,683 sq m	+13,724 sq m
Car Parking	119	190	87	-32
Cycle Parking	72	72	124	+52
Designated Van Parking	0	13	12	+12

Table 2.1: Comparison of Areas

Source: Thornton O'Connor Town Planning (also Included in Stephen Reid Consulting Traffic and Transportation Limited Report)

As shown in the table above, some 776 sq m of ancillary office facilities are now proposed (reduced from the 2,437 sq m proposed at Planning Application Stage and also reduced from the 1,042 sq m permitted at the site). The table clearly demonstrates that a significant portion of the increase in floor area proposed from the extant scheme is provided at internal mezzanine level to accommodate racking systems. It should also be noted that the site currently has permission to accommodate 119 No. car parking spaces and the amended scheme now proposed provides a reduced 87 No. car parking spaces.

Whilst the organisational strategy of Uniphar has been amended to address the concerns of South Dublin, it is important to note it is not office use proposed, instead ancillary office use is proposed and thus in our professional town planning opinion, the policy that limits office area between 100 sq m - 1,000 sq m within Objective 'EE' lands is not applicable to the subject application for a warehouse development. The leading authority in case law with regard to the concept of ancillary uses is the Rehabilitation Institute v Dublin Corporation where Barron J. set out a number of principles relating to this type of activity. The High Court in that case was considering whether the use of part of the Rehabilitation Institute had a separate and distinct planning use as it was used as a workshop in the context of the remainder of the building being used for administrative purposes. Barron J. held that there was a single planning unit as the workshop use was ancillary to the principle use and relied on a number of English authorities. It set out the principle which can be summarised as follows: (a) A use is ancillary to a principle use if this ancillary use will not amount to development for the purposes of the Planning and Development Acts. Where however the ancillary use becomes the principle use, then it will displace the established use and it will at that point amount to development as the planning unit will have materially changed its use.

This issue was considered in some detail by McGuinness J. in *Palmerlane Limited v An Bord Pleanála* [1999] 2 I.L.R.M. 514, where a shop in Dame Street was selling food for consumption off the premises. The sale of food for consumption off the premises is a separate and distinct use but the shop argued in that case that it was merely part of an overall use for retail purposes and the High Court agreed. They applied the principles in the *Rehabilitation* case and held that where this use is ancillary to the principle use, it forms part of that use and therefore the activity did not amount to a change of use for the purposes of the Planning and Development Acts. It would only be in circumstances where this ancillary use became the dominant use that there would be a change of use such as to require planning permission. Thus, in the case of a warehouse development, it is our opinion that the use of part of the planning unit for office use is ancillary to the primary warehouse use of the structure and as such policies relating solely to office use to not apply.

2.1.2 Response to Item No. 1 (2)

As aforementioned, the extent of ancillary office to be provided at the subject site is now reduced. As detailed in the Stephen Reid Consulting Traffic and Transportation Limited *Traffic Inputs to RFI Response* document:

'Uniphar is a very specific business which delivers to approximately 50% of the pharmacies and medical facility dispensaries in the State, fulfilling prescription requirements within the same day in the Greater Dublin Area and providing a next day delivery to areas further afield. With an increasing ageing population, many of whom are reliant on security of obtaining prescriptions in a timely manner, this specific operation should be considered as a critical strategic infrastructural function. The shift patterns are specifically tailored to address the fulfilment and delivery model to ensure pharmacies can complete prescriptions efficiently.'

Uniphar Group require an expansion of their premises and operation to absorb and meet the growing demand arising from Ireland's ageing population to allow them to provide essential pharmaceutical services nationwide.

2.1.3 Response to Item No. 1 (3)

A reduced provision of car parking is now proposed and the multi-storey element has been removed from the proposal in place of a surface-level car parking arrangement. This has also allowed for an increase in the provision of SuDS measures and landscaping on the site. Some 87 No. spaces are now proposed, reduced from the 190 No. car parking spaces proposed at planning application stage (and also reduced from the 119 No. already permitted at the site). An extract from the Site Plan proposed at Planning Application stage and the Site Plan now proposed at *Request for Further Information* stage has been included below:

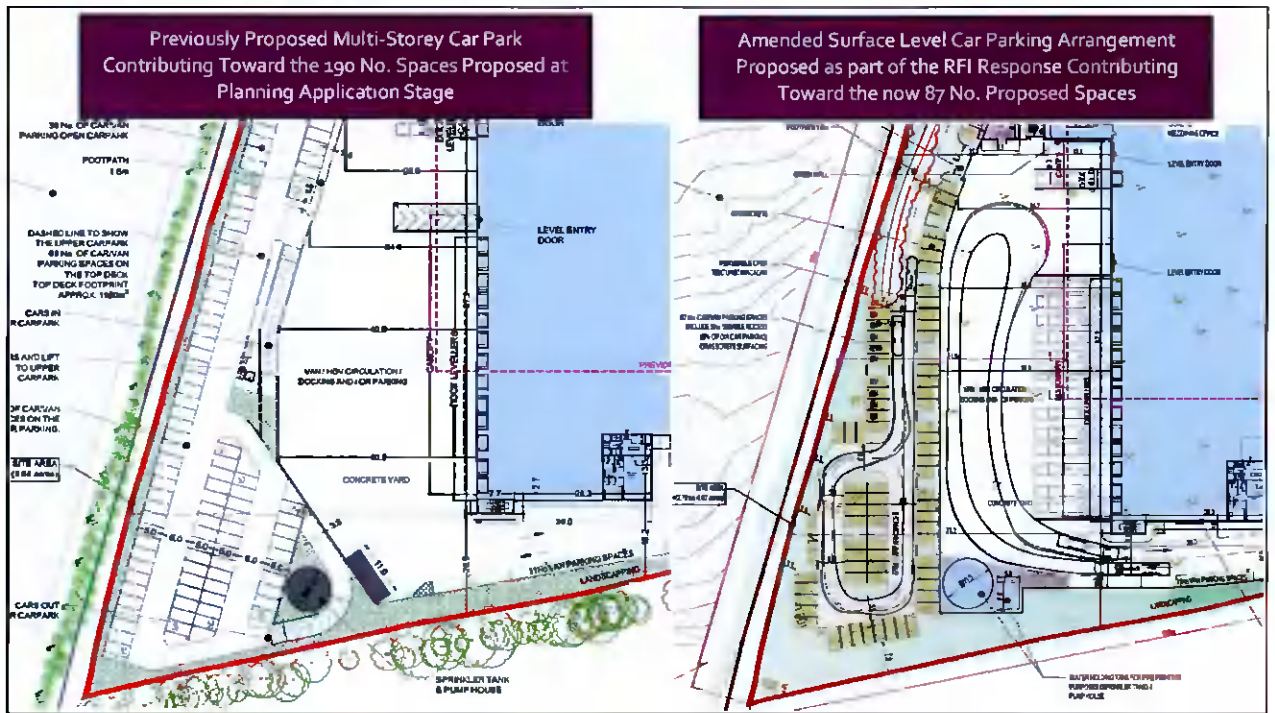


Figure 2.2: Extract from Proposed Site Plan Proposed as Part of Planning Application Stage (Left) and the Site Plan Now Proposed at RFI Stage (Right)

Source: Site Plan with Swept Paths (Drawing No. D1658-D2), Kavanagh Burke Consulting Engineers, Annotated by Thornton O'Connor Town Planning, 2021.

2.1.4 Response to Item No. 1 (4)

As a result of the revisions to the proposed floor area, some 124 No. bicycle parking spaces are now proposed as part of the *Request for Further Information Response* in accordance with the *South Dublin County Council Development Plan 2016-2022* where one space is required per 200sq m of floor space. Given 24,704 sq m of gross floor space (not including staff facilities and plant room areas) is now proposed at *Request for Further Information* stage some 124 No. bicycle parking spaces are required. The 124 No. proposed meets this requirement. An extract from the proposed Site Plan has been included in the Figure below showing the location of the 124 No. proposed bicycle spaces.

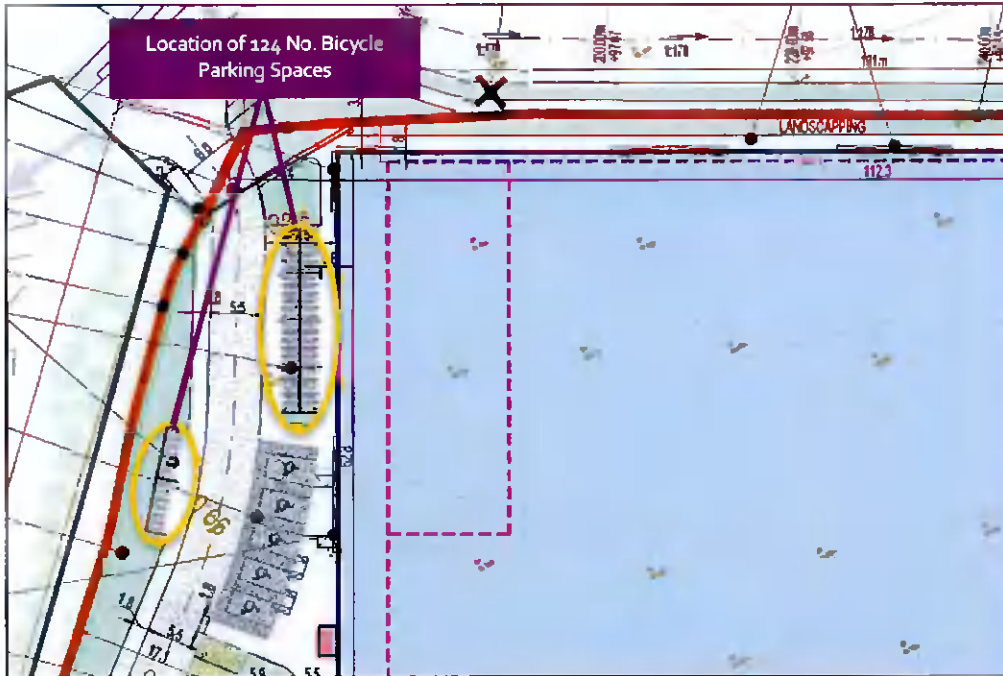


Figure 2-3: Location of Proposed Bicycle Parking on Site Plan

Source: Site Plan with Swept Paths (Drawing No. D1658-D2), Kavanagh Burke Consulting Engineers, Annotated by Thornton O'Connor Town Planning, 2021.

2.2 Item No. 2

Item No. 2 states:

'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.'

2.2.1 Response to Item No. 2 (1 & 2)

Item 2 of Stephen Reid Consulting Traffic and Transportation Limited *Traffic Inputs to RFI Response* document sets out the operation details of the proposed development.

2.2.2 Response to Item No. 2 (3)

Please refer to Item 3 – Car Parking Provision of the Stephen Reid Consulting Traffic and Transportation Limited *Traffic Inputs to RFI Response* document which concludes that:

'The provision of 87 car parking spaces (plus 12 van spaces) is considered appropriate having regard to the projected employment at the development and the operations advised by Uniphar.'

The Response also details the public transport provision in the locale which includes Dublin Bus Route No. 68 and Dublin Bus Route No. 68X. An existing network map has been provided below for reference:



Figure 2.4: Existing Network Map with Subject Site Identified by a Star

Source: BusConnects.ie, Annotated by Thornton O'Connor Town Planning, 2021.

Plans to address and improve public transport provision in the locale are afoot, in the form of the proposed Bus Connects programme which will see 3 No. bus routes along the R120 as set out in Figure 2.5 below:

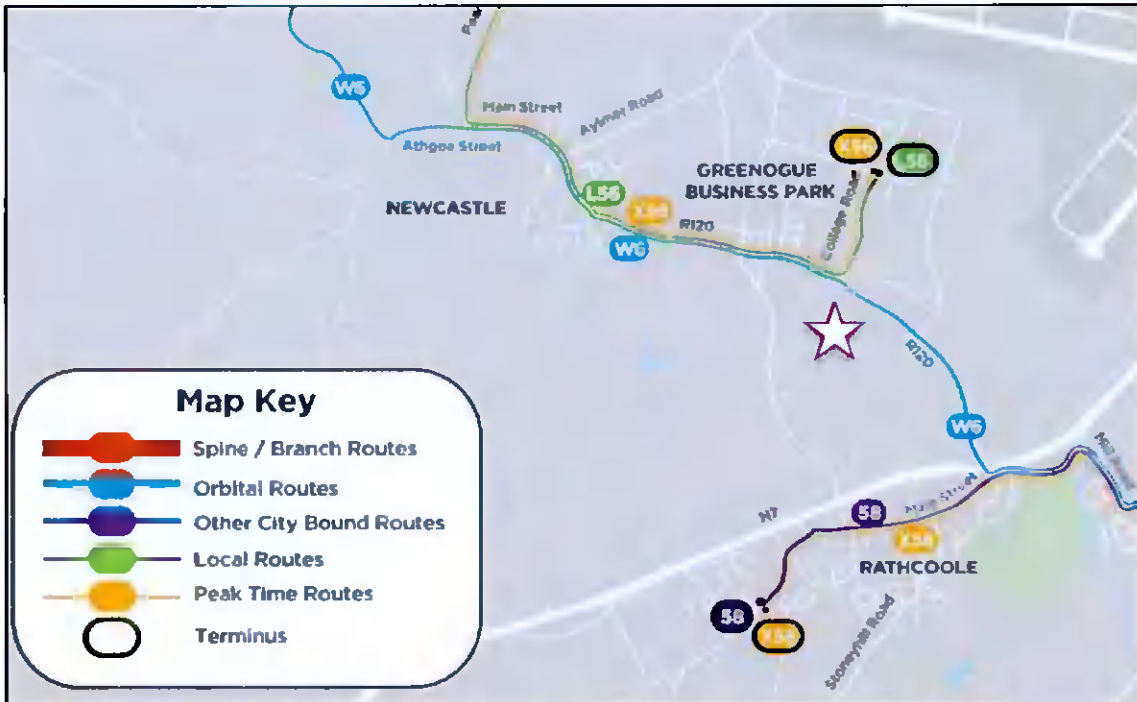


Figure 2.5: Proposed Bus Network New Routes with Subject Site Identified by a Star

Source: BusConnects.ie, Annotated by Thornton O'Connor Town Planning, 2021.

The nearby bus routes are summarised below:

Proposed Bus Routes		
Bus Route:	Destinations:	Weekday Frequency:
Orbital Routes		
Route W6:	Maynooth - Celbridge - Citywest - Tallaght	Every 30 minutes (6 am to 10 pm)
Peak Time Routes		
Route No. L56:	Newcastle - Clondalkin - Red Cow	Every 60 minutes (8 am to 11 pm)
Local Routes		
Route No. L56:	Newcastle - Clondalkin - Red Cow	Every 60 minutes (6 am to 11 pm)

In advance of the Bus Connects programme, there are plans for shuttle services to operate between the Red Cow Luas and Greenogue (an operator has recently been given a license from the NTA to operate this service and is developing proposed frequency and specific route coverage within the area along with the Greenogue Management).

With regard to a Mobility Management Plan, Uniphar Group will commit to delivering such a plan however it is considered appropriate that this would be a condition of the planning as while a generic 'framework' report could be submitted at this time, it would be more useful to undertake and submit this for approval by the Planning Authority when the development is completed and occupied.

2.2.3 Response to Item No. 2 (4)

Please refer to the proposed Site Plan (Drawing No.: D1658 D2) in which the requisite footpath widths have been provided for.

2.2.4 Response to Item No. 2 (5)

An extract of the Site Plan drawing, prepared by Kavanagh Burke Consulting Engineers, has been included below for the southwestern and southeastern portion of the site below:

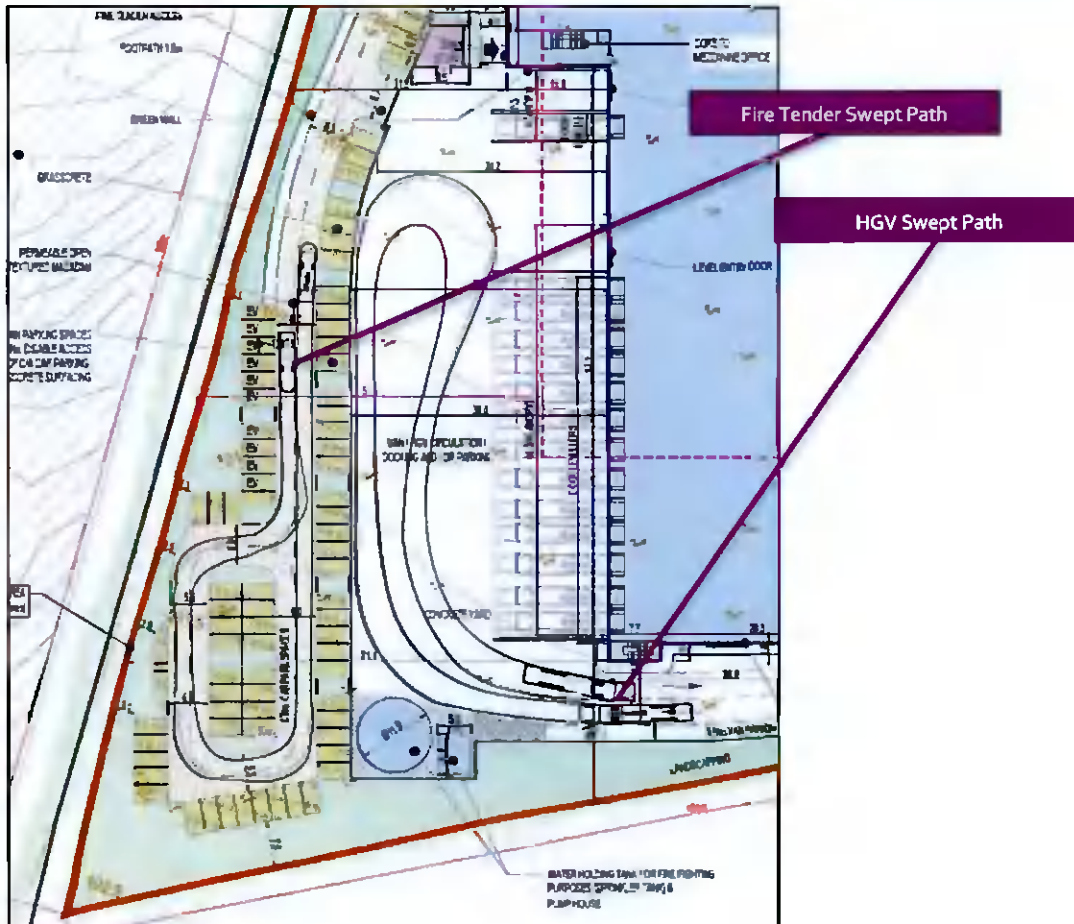


Figure 2.6: Swept Path Analysis from the Southwestern Portion of the Lands

Source: Site Plan with Swept Paths (Drawing No. D1658-D2), Kavanagh Burke Consulting Engineers, Annotated by Thornton O'Connor Town Planning, 2021.

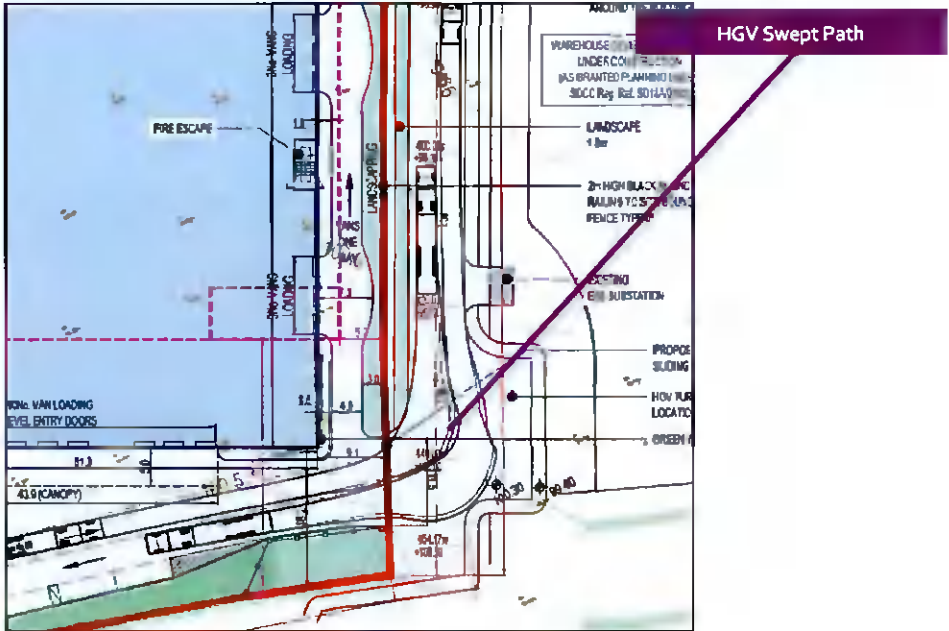


Figure 2.7: Swept Path Analysis from the Southeastern Portion of the Lands

Source: Site Plan with Swept Paths (Drawing No. D1658-D2), Kavanagh Burke Consulting Engineers, Annotated by Thornton O'Connor Town Planning, 2021.

2.2.5 Response to Item No. 2 (6)

The location of the 10 No. EV Car Parking Spaces has been shown below on the Site Plan drawing (Drawing No. D1658 D2) prepared by Kavanagh Burke Consulting Engineers:

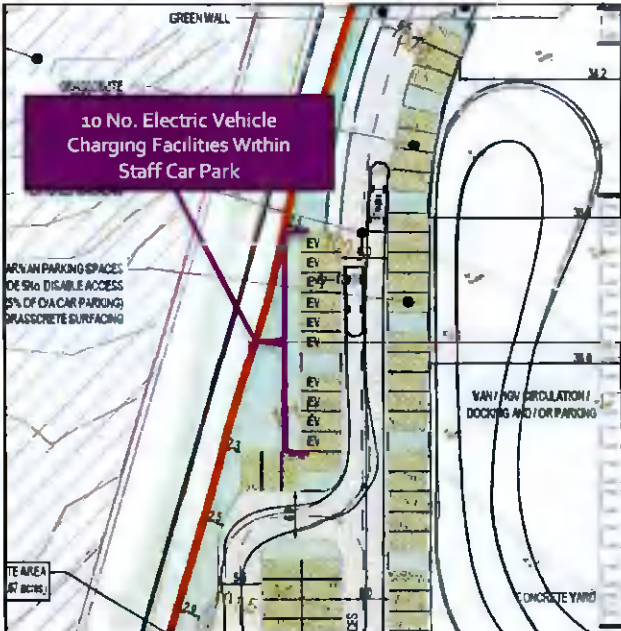


Figure 2.8: Electric Vehicle Charging Facilities

Source: Site Plan with Swept Paths (Drawing No. D1658-D2), Kavanagh Burke Consulting Engineers, Annotated by Thornton O'Connor Town Planning, 2021.

2.3 Item No. 3

Item No. 3 states:

'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).'

2.3.1 Response to Item No.3 (1a)

Please refer to the Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002) which details the full redesign of the landscaping proposal for the proposed warehouse development at Site C submitted as part of this *Response to Request for Further Information*.

One such redesign element is the proposed green roof provided over the office element of the proposed warehouse. An extract from the Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002) prepared by JBA Consulting has been included below showing the location of the proposed green roof:

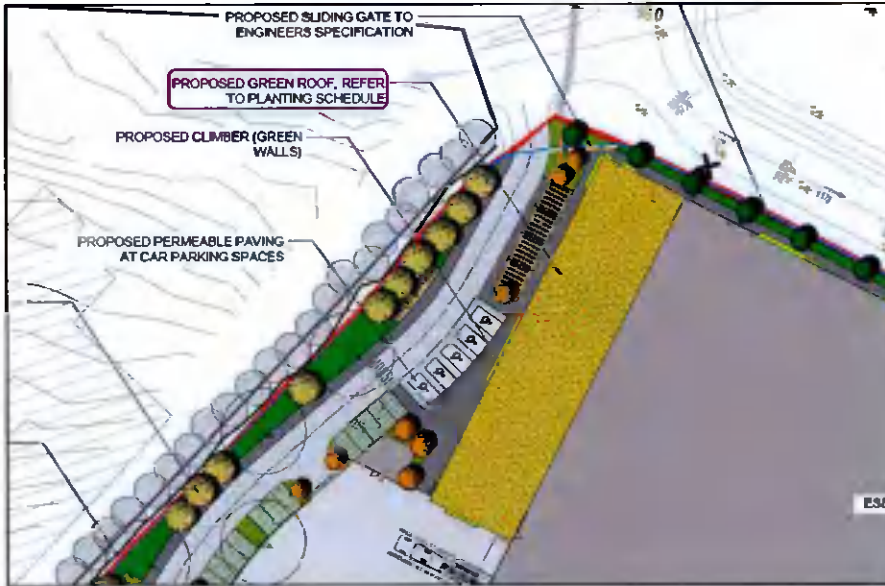
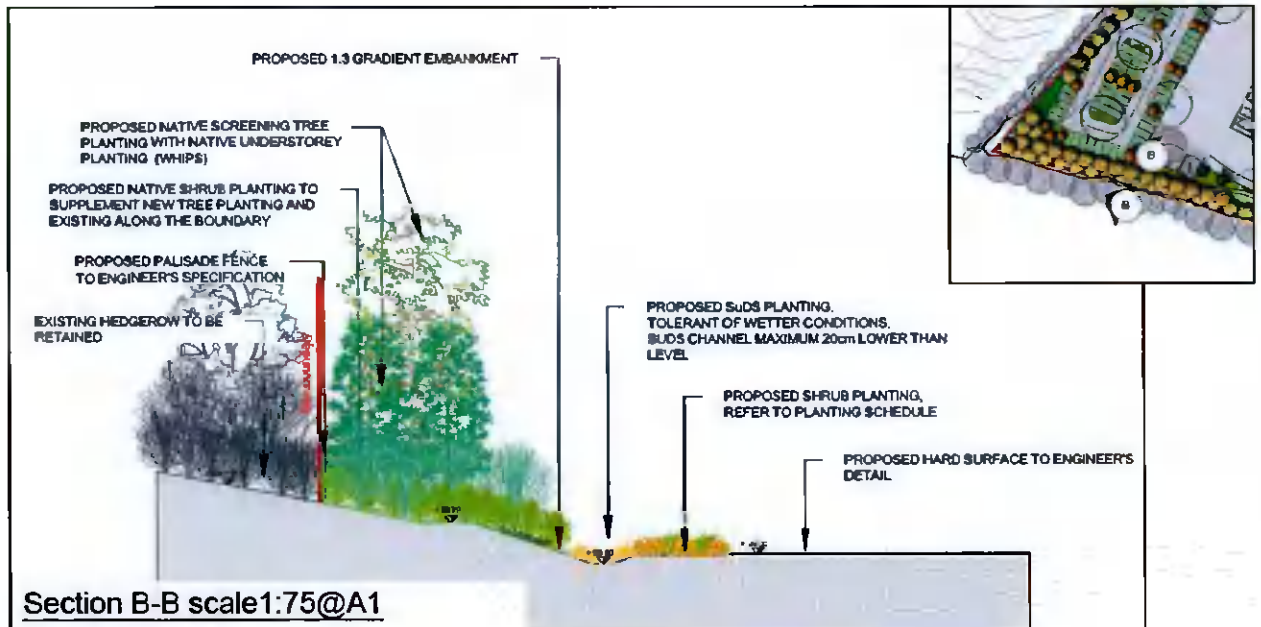


Figure 2.9: Location of Proposed Green Roof

Source: Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002), JBA Consulting, Annotated by Thornton O'Connor Town Planning, 2021

2.3.2 Response to Item No.3 (1b)

A swale has been included along the southern boundary with a biodiverse mix of plants that tolerate wetter ground conditions. Section B-B has been included below taken from the Section plan drawing prepared by JBA Consulting (Drawing No. CER-JBAI-XX-XX-DR-L-0003).



Section B-B scale 1:75@A1

Figure 2.10: Proposed Swale

Source: Section Plan (Drawing No. CER-JBAI-XX-XX-DR-L-0003), JBA Consulting.

2.3.3 Response to Item No.3 (1c)

The southern boundary has received particular attention by the Design Team in this *Response to Further Information Request*. Increased planting has been provided along the southern boundary with proposed native screening tree planting and proposed native shrub planting. An extract from the Landscape Masterplan proposed at Planning Application stage and the revised design prepared as part of this *Response to Request for Further Information* have been included below.

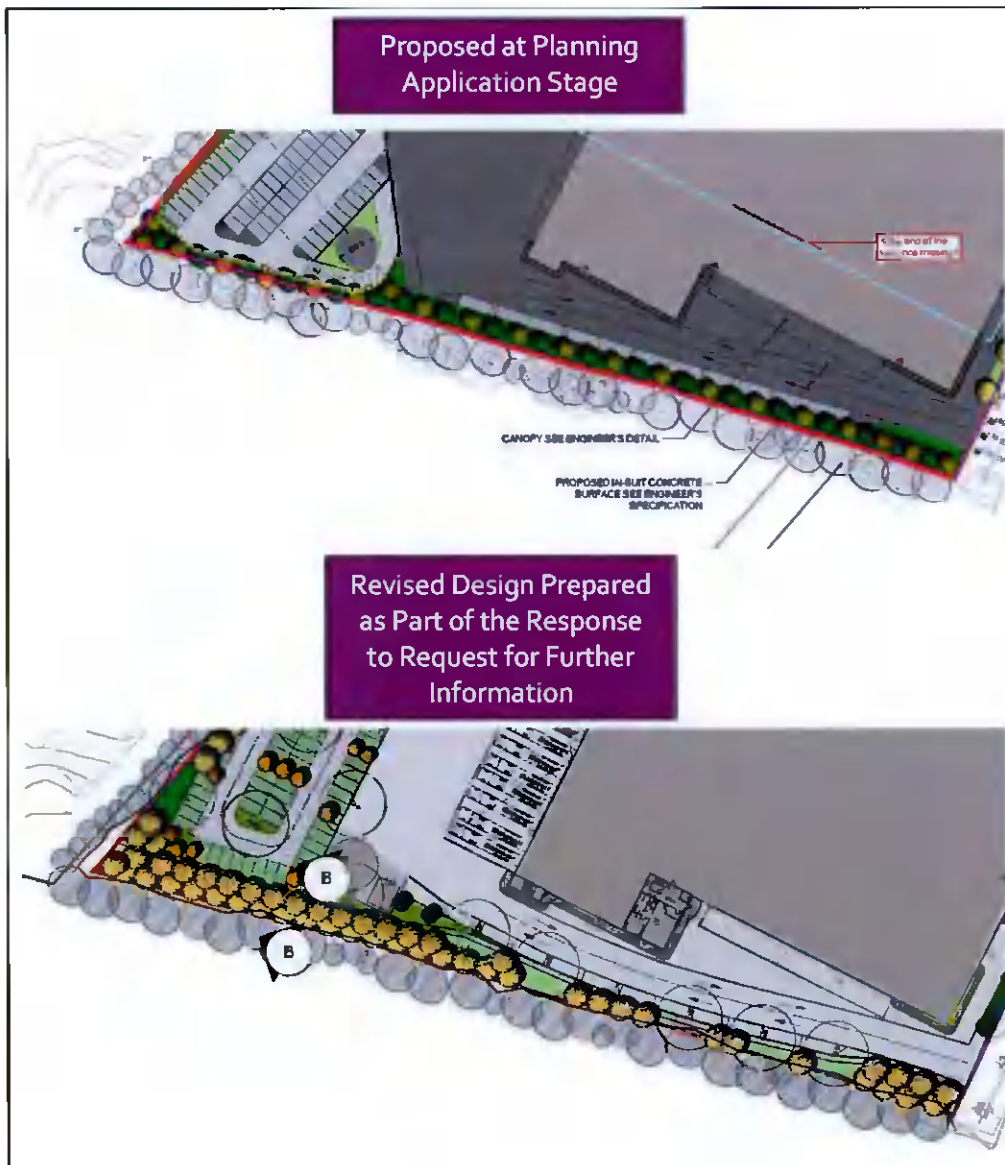


Figure 2.11: Initial and Revised Landscape Masterplan

Source: Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002), JBA Consulting, Annotated by Thornton O'Connor Town Planning, 2021

2.3.4 Response to Item No.3 (1d)

Permeable paving has been provided for throughout the site where possible. Permeable paving has been provided in the van parking areas, staff car park, visitor's car park and circulation areas. However, where permeable paving could not be provided for, such as in the parking bays, grasscrete has been provided to allow for "at source" water disposal and to increase the amount of green areas (the distributor road and disabled car parking are to be finished with open texture macadam to allow for infiltration at source since grasscrete is not suitable for these areas).

2.3.5 Response to Item No.3 (1e)

Planting has been provided for between car parking spaces with every fifth car parking space provided with a shrub planting mix or a native tree.

2.3.6 Response to Item No.3 (2a)

Along the northern boundary, native tree species shall be provided at 10m intervals. An extract from the Landscape Masterplan proposed at Planning Application stage and the revised design prepared as part of this *Response to Request for Further Information* have been included below.



Figure 2.12:
Initial and Revised Landscape Masterplan

Source:

Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002), JBA Consulting, Annotated by Thornton O'Connor Town Planning, 2021

2.3.7 Response to Item No.3 (2b)

Along the eastern boundary access road, street trees have been provided for as shown in the Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002) prepared by JBA Consulting.

With regard to within the car parking area, increased amounts of planting have been provided for as shown in the Figure below, ensuring that the warehouse scheme is not legible as a hard surfaced environment but instead is legible as a high quality designed warehouse scheme.

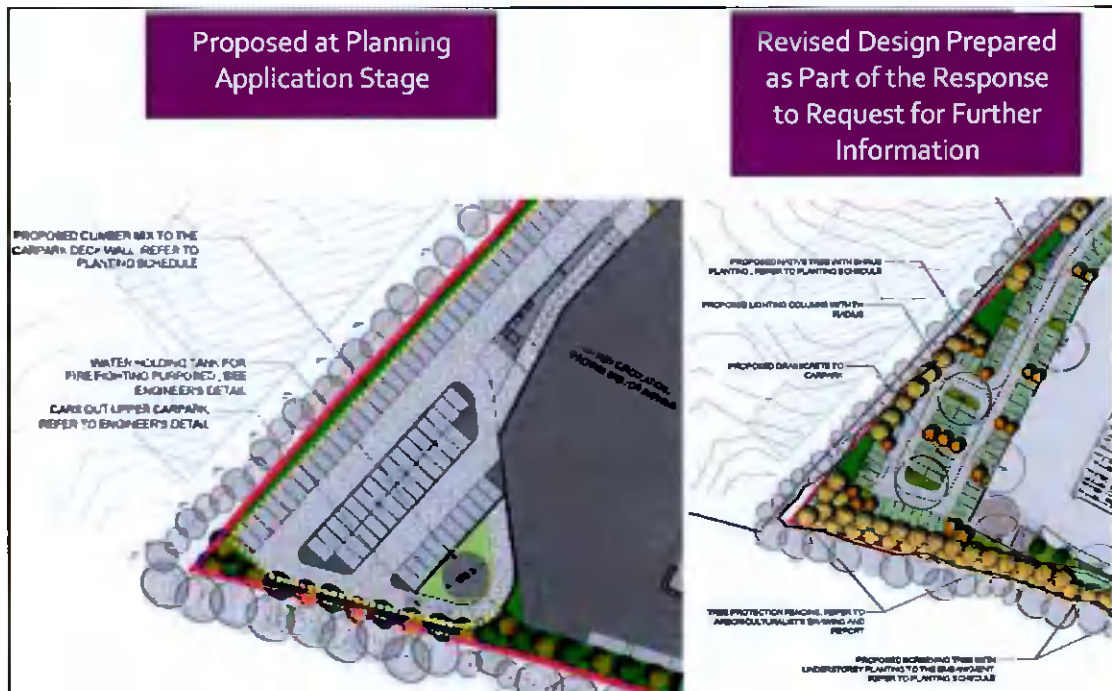


Figure 2.13: Initial and Revised Landscape Masterplan

Source: Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002), JBA Consulting, Annotated by Thornton O'Connor Town Planning, 2021

2.4 Item No. 4

Item No. 4 states:

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.'

2.4.4 Response to Item No.4 (1)

The following SuDS measures have been proposed as part of this *Response to the Request for Further Information*:

- Storm water network and attenuation tank layout altered to suit the new site layout after the removal of the multi storey car park and addition of a new sprinkler tank.
- A green roof to the office building element of the warehouse has been added as a SuDS measure.
- Green/living walls have been provided multiple locations on the elevations as a SuDS measure
- Proposed permeable paving provided to the van parking and circulation areas.
- Staff and visitor's car park resurfaced with permeable paving with parking bays to be surfaced with grasscrete to allow for "at source" water disposal and to increase the amount of green areas (the distributor road and disabled car parking are to be finished with open texture macadam to allow for infiltration at source since grasscrete is not suitable for these areas).
- Irrigation tree pits to be installed across the site car park as per the landscape architect layout to intercept any residual runoff from open texture macadam.

2.4.5 Response to Item No. 4 (2)

An email correspondence between Kavanagh Burke Consulting Engineers (Bartosz Kedzierski) and South Dublin County Council (Fionnuala Collins) has been enclosed as Appendix A in which feedback was received regarding a Storm Water runoff management plan for the proposed warehouse development at Site C. Ms Fionnuala Collins recommended the revision of the scheme as follows:

'Green Infrastructure proposals to include a green roof, swales, increased planting and for natural SuDS features to be incorporated into the drainage proposals.'

An updated Drainage and Watermain Layout (Drawing No. D1658 D3) has been prepared following this correspondence and has been enclosed with this *Response to Further Information Request*.

2.4.6 Response to Item No.4 (3)

A Maintenance Plan has been included as part of the *Drainage Design Report* prepared by Kavanagh Burke Consulting Engineers. The Maintenance Plan contains product specifications and details how the water run-off from the site will be mitigated through natural solutions.

2.4.7 Response to Item No.4 (4)

Please refer to Kavanagh Burke Drainage and Watermain Layout drawing (D1658 D3), JBA Consulting's Landscape Masterplan (Drawing No. CER-JBAI-XX-XX-DR-L-0002) and also the Section Plan drawing (Drawing No. CER-JBAI-XX-XX-DR-L-0003). Details of how the proposed SuDS features work are detailed on the aforementioned drawings.

2.5 Item No. 5

Item No. 5 states:

'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).'

2.5.1 Item No. 5 (1)

Please refer to the *Tree Protection Plan* (Drawing No. JPP-TPP-001) drawing prepared by Arbor-Care (Ltd) Professional Consulting Tree Service enclosed with this *Response to Request for Further Information*.

2.5.2 Item No. 5 (2)

A Tree Survey Schedule, taken from the *Arboricultural Impact Assessment* prepared by Arbor-Care (Ltd) Professional Consulting Tree Service, has been included below:

Category	Quantity	Category %
A-Tree of high quality	0	0%
B-trees of good quality	1-hedgerow	100%
C (Low quality or trees less than 75mm diameter)	0	0%
U (remove due to poor condition)	0	0%
Total Trees surveyed	0	0%

Figure 2.14: Survey of Existing Trees (including hedgerow outside site boundary)

Source: Arbor-Care (Ltd) Professional Consulting Tree Service

With regard to the existing hedgerow along the western boundary (not within the site), Arbor-Care (Ltd) Professional Consulting Tree Service states:

'There are no trees within the site, along the western boundary of the site there is a low lying hawthorn hedge, it is outside the boundary of the site. There will be no impact on this hedgerow however due to its proximity to the site and to ensure that is protected it is recommended that a line of protective fencing is placed to the dripline of the hedge. There are no internal trees.'

2.5.3 Item No. 5 (3)

An Arboricultural Impact Assessment has been included in Section 6.0 of the *Arboricultural Impact Assessment* document enclosed with this *Response to Request for Further Information*. The summary table details proposed removals, incursions and pruning to facilitate the proposed development and has been included below for reference:

Impact	Category A	Category B	Category C	Category U	Un-surveyed tree features
Trees to be removed to facilitate the Proposed Development	0 individual tree,	0 individual trees,	0 individual trees.	0 individual trees	0 individual trees
Total	0 feature	0 features	0 features	0 features	features
Trees subject to an RPA incursion	0 individual tree	0 tree features	0 tree features	0 individual trees	0
Total	0 feature	0 features	0 features	0 features	0
Trees to be pruned to facilitate the Proposed Development	0	0	0	0	0
Total	0	0	0	0	0

Figure 2.15: Summary of Removals, Incursions and Pruning to Facilitate the Proposed Development

Source: Arbor-Care (Ltd) Professional Consulting Tree Service

The *Arboricultural Impact Assessment* concludes that *'the proposed development will involve no tree loss as the site is devoid of any trees.'*

2.5.4 Item No. 5 (4)

As there are no existing trees or hedges within the site and no trees are proposed to be removed; the presence of trees has not resulted in any adjustments or revisions to the proposed site layout. The only consideration recommended by the arborist is the provision of a line of protective fencing placed on the dripline of the adjoining hedge (not within the site) along the western boundary.

2.5.5 Item No. 5 (5)

As there are no existing trees or hedges on the site and no trees are proposed to be removed, a Tree Constraints Plan has not been prepared.

2.5.6 Item No. 5 (6)

Please refer to the *Tree Protection Plan* (Drawing No. JPP-TPP-001) drawing prepared by Arbor-Care (Ltd) Professional Consulting Tree Service enclosed with this *Response to Request for Further Information*.

2.5.7 Item No. 5 (7)

Hedgerows on site will be protected both during and after construction. William Mulville has been appointed as the Bat Ecologist by JBA Consulting and his duties will also involve overseeing Item 6 (a) - Provide for the protection of the hedgerows proposed for retention both during and after construction. Please refer also to the *Tree Protection Plan* (Drawing No. JPP-TPP-001) and *Landscape Masterplan* (Drawing No. CER-JBAI-XX-XX-DR-L-0002) which set out the location of the tree protection fencing.

2.5.8 Item No. 5 (8)

The below summary table has been prepared showing that no trees or hedges are proposed to be removed:

Impact	Category A	Category B	Category C	Category U	Un-surveyed tree features
Trees to be removed to facilitate the Proposed Development	0 individual tree,	0 individual trees,	0 individual trees.	0 individual trees	0 individual trees
Total	0 feature	0 features	0 features	0 features	features
Trees subject to an RPA incursion	0 individual tree	0 tree features	0 tree features	0 individual trees	0
Total	0 feature	0 features	0 features	0 features	0
Trees to be pruned to facilitate the Proposed Development	0	0	0	0	0
Total	0	0	0	0	0

Figure 2.16: Summary of Removals, Incursions and Pruning to Facilitate the Proposed Development

Source: Arbor-Care (Ltd) Professional Consulting Tree Service

2.5.8 Item No. 5 (9)

As there are no existing trees or hedges on the site and no trees are proposed to be removed, pre-development photos have not been taken.

2.5.8 Item No. 5 (10)

The Arboricultural Impact Assessment has been prepared by:

Michael Garry, BSc. Arb. Dip Arb M.ArborA, Pgrad Ecology (UCC),
 Arbor-Care (Ltd) Professional Consulting Tree Service,
 Friarstown, Grange, Co. Limerick
 Telephone: (086) 3082808
 info@arborcare.ie
 www.arborcare.ie

2.5.8 Item No. 5 (11)

An initial tree survey and visual condition assessment was on the 17th of September 2021

2.6 Item No. 6

Item No. 6 states:

'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.'

2.6.1 Response to Item No. 6 (a)

Hedgerows on site will be protected both during and after construction. William Mulville has been appointed as the Bat Ecologist by JBA Consulting and his duties will also involve overseeing Item 6 (a) - Provide for the protection of the hedgerows proposed for retention both during and after construction.

2.6.1 Response to Item No. 6 (b)

An updated lighting system has been prepared by Axiseng Consulting Engineers (Drawing No. UWBC-AXE-XX-00-DR-ME-60102). JBA Consulting Engineers state in relation to the updated lighting system that:

'This new design incorporates all the standard bat mitigation measures as noted within the site lighting drawing. The placement of lampposts and restricted heights (<6m) also safeguards the dark corridors that coincide with the hedgerows that run along the western and southern borders of the site. I'm confident in the continued use of the dark corridor areas by the local bat populations given this year's bat activity data collected from JBA's post-construction monitoring of the site immediately to the north-east, which has similar mitigation measures in place.'

An attempt was made to engage with South Dublin County Council's Heritage Officer. An email correspondence between William Mulville (JBA Consulting) and Ms. Rosaleen Dwyer (dated 27th October 2021) has been enclosed as Appendix B of this *Response to Further Information Request*. In the email, an updated lighting design was included alongside information of bat monitoring surveys however at the time of writing, no response was received.

2.6.1 Response to Item No. 6 (c)

William Mulville has been appointed as the Bat Ecologist by JBA Consulting to oversee the 36-month monitoring process of the site, including the construction and post-construction phases. This will include bat activity surveys as well as the overseeing of Item 6 (a) - Provide for the protection of the hedgerows proposed for retention both during and after construction.

An attempt was made to engage with South Dublin County Council. An email correspondence between William Mulville (JBA Consulting) and Ms. Rosaleen Dwyer (dated 27th October 2021) has been enclosed as Appendix B of this *Response to Further Information Request*. In the email, an updated lighting design was included alongside information of bat monitoring surveys however at the time of writing, no response was received.

2.7 Item No. 7

Item No. 7 states:

'The applicant is requested to provide details regarding the proposed signage for the development including dimensions and location.'

2.7.1 Response to Item No. 7

No signage is proposed as part of the subject application. Should signage be required, a subsequent Planning Application will be lodged at a later date.

2.8 Item No.8

Item No. 8 states:

'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.'

2.8.1 Response to Item No.8

Firstly, it should be noted that there are no changes to the height proposed to the permitted structure at the site. However, please refer to the *Aviation Safety Assessment Report [Additional Information]* enclosed with this Response to *Request for Further Information*, prepared by O'Dwyer and Jones Design Partnership. This report outlines the concerns previously expressed by the Department of Defence that the proposed warehouse might be located within Casement's "Inner Zone" (in which additional building height limits apply, over and above the normal ICAO obstacle limits).

The Aviation Safety Assessment Report details that this 'concern is unwarranted, as it is clear that 'Site C' lies wholly outside the "Inner Zone" 2km circle (as it was defined in 2009 by the Department of Defence itself).'

The Aviation Safety Assessment Report continues by outlining that 'the only 'obstacle limitation surface' (or Casement "Zone") under which the proposed warehouse development will lie is Casement Aerodrome's Inner Horizontal Surface. This Surface is at 131.6m OD, which is 8.65m higher than the highest element of the proposed warehouse (its parapet at 122.95m OD), so that the proposed development will not infringe in any way upon this Surface. The proposed development does not lie under any of the aerodrome's other obstacle limitations surfaces, such as the Take-off Climb Surface from Runway 22 (at 418m distance) or an Approach Surface to Runway 04 (at 390m distance, when calculated to "instrument" dimensions).' [O'Dwyer and Jones Design Partnership's Emphasis]

The *Aviation Safety Assessment Report* concludes that the proposed warehouse development complies fully with all aviation and aeronautical requirements affecting the site.

3.0 CONCLUSION

We trust that this submission fully addresses the *Request for Further Information* in respect of the subject development at a site known as Site C, College Lane, Greenogue, Rathcoole, Co. Dublin.

Please revert to us if we can be of further assistance or clarification.

We look forward to receiving an acknowledgement and subsequent Decision in respect of the above.

Yours Sincerely



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning



Appendix A: Email correspondence between Bartosz Kedzierski (Kavanagh Burke Consulting Engineers) and Fionnuala Collins (South Dublin County Council)

From: Fionnuala Collins <fcollins@SDUBLINCOCO.ie>
Sent: Friday 29 October 2021 08:34
To: Bartosz Kedzierski <B.Kedzierski@kavanaghburke.ie>
Cc: Laurence Collieran <L.COULLERAN@SDUBLINCOCO.ie>; Suzanne Furlong <suzannefurlong@SDUBLINCOCO.ie>
Subject: RE: Storm Water runoff management plan for site C Greenogue

Dear Bartosz

I have reviewed the documents you submitted and discussed with Laurence. The surface water drainage proposals submitted have insufficient SuDS, limited to permeable surfaces and lacking in biodiversity and amenity. SuDS tree pits are mentioned but are not shown on the drawings or detailed. We require the use of filter strips and natural planted areas to manage surface water in the landscape. We refer you to the additional information request for Green Infrastructure proposals to include a green roof, swales, increased planting etc and for natural SuDS features to be incorporated into the drainage proposals.

We recommend you liaise with the landscape architect to develop a detailed surface water management strategy that delivers biodiversity and amenity as well as water treatment and attenuation. Please submit your revised proposals through the planning department for approval.

However if you have any further queries, you are welcome to be in touch with us at Public Realm.

Regards

Fionnuala Collins

Fionnuala Collins | Assistant Parks Superintendent|
Department of Environment, Water and Climate Change |
South Dublin County Council, County Hall, Tallaght, Dublin 24.
fcollins@sdublincoco.ie
01 414 9000
069 210 7264

Appendix B: Email correspondence between William Mulville (JBA Consulting) and Rosaleen Dwyer

SD21A/0200 - Additional Information Requirement: Updated Lighting Design and Monitoring

 William Mulville <William.Mulville@jbaconsulting.ie>
To: Rosaleen Dwyer
Patricia Byrne; Bernadette O'Connell


 Reply  Reply All  Forward 

Wed 27/10/2021 09:04

Hi Rosaleen,

I'm writing to you in relation to the Additional Information requirements for the SD21A/0200 site at College Lane, Rathcoole.

As per item 6. (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; I am updating you with the new lighting design for the proposed site (see attached).

This new design incorporates all the standard bat mitigation measures as noted within the pdf. The placement of lampposts and restricted heights (<5m) also safeguards the dark corridors that coincide with the hedgerows that run along the western and southern borders of the site. I'm confident in the continued use of the dark corridor area by the local bat populations given this year's bat activity data collected from JBA's post-construction monitoring of the site immediately to the north-east, which has similar mitigation measures in place.

As per item 6. (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; I will be appointed as the Bat Ecologist by JBA Consulting to oversee the 36-month monitoring process of the site, including the construction and post-construction phases. This will include bat activity surveys as well as the overseeing of item 6 (a) - Provide for the protection of the hedgerows proposed for retention both during and after construction.

Please get back to me with any comments you may have in relation to the lighting design.

Regards,

William Mulville, BSc (Hons), MSc, ACEEM
Ecologist
JBA Consulting Dublin