

# Comhairle Chontae Atha Cliath Theas

**PR/1535/21**

## Record of Executive Business and Chief Executive's Order

**Reg. Reference:** SD21A/0272      **Application Date:** 04-Oct-2021  
**Submission Type:** New Application      **Registration Date:** 04-Oct-2021

**Correspondence Name and Address:** Ryan Hanley Consulting Engineers 1, Galway Business Park, Dangan, Co. Galway, H91A3EF

**Proposed Development:** Demolition of existing workshop and (defunct) Activated Carbon Building adjacent the old/northern Treatment Plant Building; construction of a Sulphuric Acid Storage and Dosing Facility Building (single storey up to approximately 8.7 metres in height) adjacent the new/southern Treatment Plant Building; construction of a Lime Storage & Dosing Facility Building (single storey up to approximately 11 metres in height) adjoining the old/northern Treatment Plant Building, associated external storage silos (2) with external staircase (up to approximately 12.3 metres in height) partially enveloped with a perforated metal architectural screen, and ancillary plant and equipment; reconfiguration and repurposing for use as a De-Alkalisation Plant of existing (disused) High-Lift Pump Hall within the old/northern Treatment Plant Building; construction of a new ancillary Workshop Building (single storey up to approximately 4.5 metres in height) to the rear/south of the 'old/northern Treatment Plant Building; temporary and enabling works to facilitate construction and continued / uninterrupted operation of the Treatment Plant site; associated network of underground pipelines/connections, and redirection of existing where necessary, throughout the site; provision of additional car parking (to the rear/south of the old/northern Treatment Plant Building), modification and extension of existing drainage, utility and services infrastructure and connections to serve and facilitate new and reconfigured buildings, and all other associated and ancillary development and works above and below ground level.

**Location:** Leixlip Water Treatment Plant Site, Cooldrinagh &

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**Applicant Name:** Backwestonpark lands, Leixlip, Co. Dublin  
**Application Type:** Irish Water  
Permission

(SW)

### **Description of Site and Surroundings**

Site Area: 0.65 Hectares.

Site visited: 5 November 2021

### **Site Description**

The site is an existing Water Treatment Plant (WTP), located to the south-east of Leixlip. The River Liffey wraps around the site along the western and northern boundaries. The entire site is bounded by the M4 to the south and by the River Liffey which provides the boundary between South Dublin County and Kildare County Council. There are numerous Protected Structures in the vicinity of the site and there are two monuments identified to the south-west. A section of the site is situated above the Salmon Leap Inn (a Protected Structure).

The application areas are represented by three separate red lines:

1. To the rear of the car park attached to the Salmon Leap Inn, within the currently built-up element of the WTP
2. Slightly to the south of (1) but also within the existing built-up element of the WTP
3. South west side of the existing WTP, currently open land. Close to River Liffey

The applicant has also indicated the extent of their ownership within the blue line. The site within the blue line contains significant areas that are open and undeveloped. Some structures are present in the south west corner. A number of protected structures are situated along the eastern boundary, both within and adjacent to the site.

It is noted that some elements of the 'proposed lime delivery route' (11118-RHL-LP2-XX-DR-PL-0020 Rev01) and 'proposed acid delivery route' (11118-RHL-LP2-XX-DR-PL-0021 Rev01) are not within the red or blue lines. The Proposed Swept Path Analysis Acid Delivery Sheet 1/2 11118-RHL-LP2-XX-DR-PL-0022 Rev01), Proposed Swept Path Analysis Acid Delivery Sheet 2/2 11118-RHL-LP2-XX-DR-PL-0023 Rev01) and Proposed Swept Path Analysis Lime Delivery 11118-RHL-LP2-XX-DR-PL-0024 Rev01).

### **Proposal**

The proposal would consist of the following:

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- **Demolition of existing workshop** and (defunct) Activated Carbon Building adjacent the old/northern Treatment Plant Building;
- **construction of a Sulphuric Acid Storage and Dosing Facility Building** (single storey up to approximately 8.7 metres in height) adjacent the new/southern Treatment Plant Building;
- construction of a **Lime Storage & Dosing Facility Building** (single storey up to approximately 11 metres in height) adjoining the old/northern Treatment Plant Building,
- associated **external storage silos (2)** with external staircase (up to approximately 12.3 metres in height) partially enveloped with a perforated metal architectural screen, and ancillary plant and equipment;
- reconfiguration and repurposing for use as a **De-Alkalisation Plant of existing (disused) High-Lift Pump Hall** within the old/northern Treatment Plant Building;
- construction of a new ancillary Workshop Building (single storey up to approximately 4.5 metres in height) to the rear/south of the 'old/northern Treatment Plant Building';
- **temporary and enabling works** to facilitate construction and continued / uninterrupted operation of the Treatment Plant site;
- associated network of underground pipelines/connections, and redirection of existing where necessary, throughout the site;
- provision of **additional car parking** (to the rear/south of the old/northern Treatment Plant Building),
- modification and extension of existing drainage, utility and services infrastructure and connections to serve and facilitate new and reconfigured buildings, and
- all other associated and ancillary development and works above and below ground level.

### Zoning:

The site is designated 'HA-LV' – 'To protect and enhance the outstanding character and amenity of the Liffey Valley'.

Site is located within the 'Inner Horizontal Surface Elevation 91.3 OD for Weston Aerodrome.

### Consultations

Roads:	Request additional information
Water Services:	Request additional information.
Pollution control:	No report received at time of writing.
Parks:	No comment.
Heritage Officer:	Additional information
Architectural Conservation Officer:	Raised concerns; offered conditions
Kildare County Council:	No report received at time of writing.
Irish Water:	No objection, subject to conditions.
Irish Aviation Authority:	No report received at time of writing.
Inland Fisheries Ireland:	No report received at time of writing.

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DoHGLG & H:	No report received at time of writing.
Comm for Regulation of Utilities:	No report received at time of writing.
An Taisce:	No report received at time of writing.
EHO:	Request additional information.

### **SEA Sensitivity Screening**

Overlap with High Amenity Liffey Valley. Overlap with Record of Monuments and Places.

Record of Monuments (adjacent to site 2 to the south west)

DU017-079 – Prehistoric site, Lithic Scatter

DU017-075001 – Ring Barrow and Iron Working

Site is close to the Liffey Valley pNHA and a number of Protected Structures (sites 1 and 2, to the north):

- RPS No.4 – Stonebridge & Former Bridge Site (RM)
- RPS No.5 – Ashlar Limestone Gate Piers
- RPS No.9 – Salmon Leap Inn

Protected structure to the east:

- RPS026-01 – 1 Cooldrinagh Lane
- RPS026-02 – 2 Cooldrinagh Lane
- RPS026-03 – 3 Cooldrinagh Lane
- RPS014 – Milestone
- RPS018 – single storey farm buildings
- RPS040 – Becketts Hotel
- RPS021 – Gate Piers

### **Submissions/Observations /Representations:**

None.

### **Relevant Planning History:**

#### **Subject site**

North element (part 1 and part 2):

**SD10A/0130** Construction of the following elements: Main Treatment Building including: Sedimentation Tanks; Filters; 1 no. Flash Mixer; Internal ESB substation; Chemical Storage and Plant Machinery; 2 no. Sludge Holding Tanks; 1 no. Clearwater Tank; 2 no. Washwater Recovery Tanks; 1 no. Balancing Tank; 1 no. Stores Building; associated site development works and interconnecting pipework, with all services connected to existing public services at this location; ancillary chambers and pumping stations; 1 no. infiltration pond to collect the surface water runoff from the proposed site, supernatant from washwater recovery tanks and overflow from the

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Clearwater tank and New Flash mixer and scours (the pond shall drain to the existing site surface water system). It is proposed to construct a temporary construction compound and site offices for the duration of the construction period. An existing entrance immediately south of Leixlip Bridge on the R148 Leixlip Road will be used during construction. **Permission Granted.**

**SD06A/0500** Construction of (1) main treatment building including sedimentation tanks, filters, 1no. Flash Mixer, internal ESB substation, chemical storage and plant machinery, (2) 2no. sludge holding tanks, (3) 1no. clearwater tank, (4) 2no. washer recovery tanks, (5) 1no. balancing tank, (6) 1no. stores building, (7) associated site development works and interconnecting pipework with all services connected to existing public services, (8) ancillary chambers and pumping stations, (9) infiltration pond to handle surface water run-off. It is proposed to construct a temporary construction compound and site offices for the duration of the construction period. An existing entrance immediately south of Leixlip Bridge on the R148 Leixlip Road will be used during construction. **Permission Granted**

**S00A/0230** Alterations and extensions to the existing main administration building. The development will provide additional offices, laboratories and welfare facilities and will also incorporate a Regional Training Centre. The proposed development includes for the following items: (1) Demolition of existing workshop and toilets (69m<sup>2</sup>). (2) Change of use of existing laboratories and pump hall to training rooms. (3) Alterations to the existing administration building incorporating the provision of new entrance foyer, reception area, conference room, lecture hall and training rooms. (4) Alterations to the eastern elevation of the existing main administration building. (5) The construction of a two storey extension to the main administration building (714m<sup>2</sup>) incorporating offices, laboratories, workshop, store and associated facilities. (6) The construction of a new retaining wall along the southern boundary. (7) Provision of car parking spaces, general site works and associated site services. **Permission Granted**

South west element:

SD10A/0130 and SD06A/0500 apply.

### **Relevant Enforcement History:**

S5188 Non-compliance with SD06A/0500 Closed

### **Pre-Planning Consultation:**

None.

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

*Policy IE1 Water & Wastewater It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County.*

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*IE1 Objective 1: To work in conjunction with Irish Water to protect, manage and optimise water supply and foul drainage networks in the County*

*IE1 Objective 2: To work in conjunction with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County and the Region*

*IE1 Objective 6: To protect the natural resources of the County which are the foundation for the Green Infrastructure network and a basis for growth and competitive advantage in the tourism, food and fisheries sectors*

*Section 6.4.4 Car Parking*

*Policy TM7 Car Parking*

*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*

*7.7.0 Environmental Quality*

*Policy IE6 Environmental Quality*

*Policy IE9 Weston Aerodrome It is the policy of the Council to have regard to the advice of the statutory bodies responsible for the control and safety of operations at Weston Aerodrome, to prevent encroachment of development around the Aerodrome which may interfere with its safe operation, in the context of the proper planning and sustainable development of the area and the protection of amenities.*

*Section 8.0 Green Infrastructure*

*Policy G5 Sustainable Urban Drainage Systems*

*Policy G6 New Development in Urban Areas*

*Section 9.3.1 Natura 2000 Sites*

*Policy HCL1 Overarching It is the policy of the Council to protect, conserve and enhance natural, built and cultural heritage features, and to support the objectives and actions of the County Heritage Plan*

*Policy HCL2 Archaeological Heritage*

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*Policy HCL3 Protected Structures*

*Policy HCL7 Landscapes*

*Policy HCL10 Liffey Valley and Dodder Valley It is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Liffey Valley and Dodder Valley, as key elements of the County's Green Infrastructure network.*

*HCL10 Objective 1: To restrict development within areas designated with Zoning Objective 'HA – LV' (To protect and enhance the outstanding character and amenity of the Liffey Valley) and 'HA – DV' (To protect and enhance the outstanding character and amenity of the Dodder Valley) and ensure that new development is related to the area's amenity potential and is designed and sited to minimise environmental and visual impacts.*

*HCL10 Objective 2: To ensure that development within the Liffey Valley and Dodder Valley will not prejudice the future creation and development of uninterrupted and coherent parklands including local and regional networks of walking and cycling routes.*

*HCL10 Objective 3: To ensure that development proposals within the Liffey Valley and Dodder Valley, including local and regional networks of walking and cycling routes, maximise the opportunities for enhancement of existing ecological features and protects and incorporates high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches, as part of the County's Green Infrastructure network.*

*greenway and an area of special amenity, recreational, heritage, geology, biodiversity and conservation value to include for the completion of the Dodder Green Route along the full length of the Dodder River.*

*HCL10 Objective 7: Within areas designated 'High Amenity – Liffey Valley' and 'High Amenity – Dodder Valley' non-residential development will only be permitted where it: Relates to the area's amenity potential or to its use for agriculture or recreational purposes, including recreational buildings; or Comprises the redevelopment of or extensions to existing commercial or civic uses or development of new commercial or civic uses within an existing established area of commercial or civic activity; and Preserves the amenity value of the river valley including its landscape value, views or vistas of the river valley and its biodiversity value.*

*Policy HCL12 Natura 2000 Sites*

*Policy 13 Natural Heritage Areas It is the policy of the Council to protect the ecological, visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas and associated habitats.*

*Section 10.0 Energy*

*Policy E3 Energy Performance in Existing Buildings*

*Policy E4 Energy Performance in New Buildings*

*Policy E5 Waste Heat Recovery & Utilisation*

*Section 11.2.1 Design Statements*

*Section 11.2.5 Enterprise and Employment Areas*

*Section 11.2.7 Building Height*

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*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*

*Section 11.6.3 (iii) Lighting*

*Section 11.6.4 Major Accidents – Seveso Sites*

*Section 11.6.5 Waste Management*

*Section 11.6.6 Aerodromes*

*Section 11.7.2 Energy Performance In New Buildings*

*Section 11.8.1 Environmental Impact Assessment*

*Section 11.8.2 Appropriate Assessment*

#### **Relevant Government Guidelines:**

***Project Ireland 2040 National Planning Framework***, Government of Ireland, 2018.

***Regional, Spatial & Economic Strategy***, Eastern & Midland Regional Assembly, 2019-2031

***Traffic and Transport Assessment Guidelines***, National Roads Authority, (2007).

***National Waste Management Plan (2012)***

***The Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021*** (2015).

***Waste Management Plan for the Dublin Region 2005-2022***



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*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).

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

*National Cycle Manual* – National Transport Authority (June 2011)

### Assessment

The main issues for assessment are compliance with:

- Zoning and Council policy
- Environmental Impact
- Landscape and visual impact
- Protected Structures
- Environmental Health
- Roads
- Services and Drainage
- Aviation Safety

### **Zoning and Council Policy**

The site is located in an area zoned 'HA-LV' – 'To protect and enhance the outstanding character and amenity of the Liffey Valley'. Public Services are 'Open for Consideration' within this zoning. It is noted that a workshop and other smaller structures are proposed. However, these are indicated as being ancillary and are therefore considered to fall under 'Public Services' also. The zoning matrix details that such a proposal is acceptable subject to acceptable landscape impact assessment. Section 4 of the Planning Submission provides a Landscape and Visual Impact Assessment, prepared by Land Planning and Design. The assessment submitted is considered to be acceptable in terms of detail and method (results are discussed below). The proposed development would not have a direct impact on the River Liffey. The visual impact will be assessed as part of the overall assessment below. Policy IE1 states "*It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County*". Having regard to the proposed development and use on an established site with a similar use and subject to the visual and environmental assessment carried out below, it is considered that the principle of the proposed development is generally in compliance with the zoning objective of the site.

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#### Design Statement

In accordance with Section 11.2.0 of the Development Plan 2016 – 2022: *‘All medium to large scale development proposals (10 dwellings and above and/or commercial, retail or community developments of 1,000sq.metres and above, or as otherwise required), shall be accompanied by a Design Statement.*

The applicant has submitted a design statement, prepared by Taylor McCarney Architects. This sets out the following:

- Viewpoints
- Alternatives

The applicant has not provided a design statement that can be considered to be in compliance with Section 11.2 of the County Development Plan. A revised statement should therefore be requested that accords with the CDP requirements. . This revised statement is necessary due to the sensitivities of the site and the high amenity value of the lands. This should be provided via **additional information.**

#### **Environmental Impact**

##### *Appropriate Assessment Screening Report*

1. Appropriate Assessment Screening Report, prepared by Ryan Hanley Consulting Engineers has been submitted with the application. It raises a number of issues that require clarification:
  - a. Item of concern – Section 3 (8) of the report states “the following temporary works are envisaged...the silos are to be placed in a depressed bund, approximately 1m below existing ground level, in order to reduce the visual impact of the height of the structures; **this will be investigated through the detailed design of the project**’. Concerns are raised that the screening has been carried out using information that may not represent the final design of the project. Furthermore, it is unclear if a scenario of leakages occurring or a catastrophic event taking place has been taken into consideration. The likelihood of damage that may occur to the River Liffey and the receiving environment and potential impact on Natura 2000 sites at Dublin Bay and residential amenity should form part of the screening process.
  - b. Information required on the potential of the River Liffey flooding and the implications of chemicals materials leeching into the river and ground.
  - c. Undergrounding pipeline. It is unclear what measures are to be in put in place to prevent failure in pipes and the possible negative impact on the environment.
  - d. The report suggests sub-optimal surveys were carried out in February 2021. The Planning Authority would require a more recent survey at an appropriate time. Although it is not ideal, an ecological walkover in December would be better than a

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survey carried out in February due to the stages in plant growth. Additional information

- e. Section 3.2 – Proposed Design Compartmentalised building – The structure contains tankage within bunds for the storage of 96% sulphuric acid. Delivery of the acid will take place by trucks. It is unclear what safeguards will be in place for any potential spillage or catastrophic event.
- f. Construction of an acid dosing chamber on the existing 1,400 raw water supply. It is unclear what safeguards will be in place for any potential spillage or catastrophic event.
- g. Relocation of key pipework infrastructure to the front of the control building at Old Leixlip WTP and construction of ancillary chambers. It is unclear what safeguards will be in place for any potential spillage or catastrophic event.

Comment from the Heritage Officer:

*“The AA Screening report needs to have regard for the downstream Natura 2000 sites also, particularly in the event of accidental discharge of toxic materials from the site as the source/pathway issue is the river. I would suggest that any proposals to prevent spillages or catastrophic events and/or to deal with the consequences of a potential incident need to be very robust - not just for possible impacts to Natura 2000 sites but also to the general ecological resource on the site itself and in the site's adjoining vicinity.*

*While...[the applicant]indicate[s] in...[the screening report] ... that the intervening areas like the dry woodland could assist with seepage of such materials, I see no details in the application of the habitats on the site or those adjacent to the site which could be impacted. I note that the only ecological survey undertaken refers only to invasive species, and this was undertaken in February, which is generally an inappropriate time of the year for ecological surveys. The woodland strip along the River Liffey is noted for the presence of rare plants, insect species, otter, and bats, so a more detailed survey at the correct time of the year would be desirable.”*

Comments from Inland Fisheries:

*“The application states that the shut of valve from the chemical delivery area will be normally open to allow uncontaminated surface water drain to the site infiltration area, the shut off valve will be closed during chemical delivery ,with emergency storage in the oversized infrastructure for tanker spillages, We consider this inadequate and suggest that this facility be monitored using an online pH probe with automatic shut down when the pH deviates from an acceptable range as agreed with SDCC .*

*All construction should be in line with a detailed site specific Construction Environmental Management Plan (CEMP). The CEMP should identify potential impacts and mitigating measures, it should provide a mechanism for ensuring compliance with environmental legislation and statutory consents. The application states that de-watering from excavations will be via siltation boxes and silt bags before discharging to the local sewer network. Further detail is*

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*required here is this surface or foul network? Any discharge to surface water and the River Liffey must comply with Surface Water Regulations 2009”.*

The Planning Authority shares the concerns raised by the Heritage Officer and Inland Fisheries and will request additional information, to include an Ecological Report to be submitted. **ADDITIONAL INFORMATION.**

### *Environmental Impact Assessment Screening Report*

The applicant has set out a rationale within the EIA Screening Report why an EIAR is not required for the development. However, additional information is required to enable the screening out of the need for an EIAR for this proposed development. In particular, it is not clear if the proposed works will result in an increase in capacity at the site or if it will increase in size greater than 25% or an amount equal to 50% of the appropriate threshold. The applicant should be requested to clearly lay out what is being proposed on the site and what its purpose is and if it will increase in size greater than 25% or an amount equal to 50% of the appropriate threshold. **ADDITIONAL INFORMATION.**

### 2. Environmental Impact Assessment Screening Report – Archaeology

The Archaeological Section of the Environmental Impact Assessment Screening Report was prepared by Ryan Hanley Consulting Engineers. The following issues arise:

- a. Text, similar to that stated in the Appropriate Assessment Screening Report, prepared by Ryan Hanley Consulting Engineers, is included in Section 2.3(8) of this report and states ‘the following temporary works are envisaged...the silos are to be placed in a depressed bund, approximately 1m below existing ground level, in order to reduce the visual impact of the height of the structures; **this will be investigated through the detailed design of the project**’. Again, the Planning Authority require that all screening should take place on the detailed design. **ADDITIONAL INFORMATION.**
- b. Archaeology, specifically relating to the 195m pipeline. This pipeline, it is stated, has ‘the potential to have a **permanent, direct, negative impact** on previously unrecorded archaeology across the western side of the general site within an area of high archaeological potential’. Section 6 Site Investigations states ‘a programme of advance site investigations may be undertaken to inform the detailed design of the proposed development’. Again, the Planning Authority require that all screening should take place on a proposed detailed design. **ADDITIONAL INFORMATION.** Furthermore, alternative routes for this pipework should be investigated and relocated away from the two recorded monuments. An existing roadway is located to the west of the boundary, this should be investigated for a possible conduit of the piping – the ground at this location has already been disturbed.

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- c. The conclusions in this report states that the landscape is an 'area of high archaeological sensitivity as attested by the numerous archaeological finds, features and deposits encountered over previous development-led excavations'...the majority of the [subject site(s)] have been subject to intensive archaeological investigations in advance of various construction phases...the proposed acid storage building and dosing facility...are to be located in a greenfield area...this area has been substantially altered and disturbed...as indicated in previous planning applications...where dosing lines are proposed, as indicated in [sic] Figure 1, Figure 2 & Figure 5...there remains moderate archaeological potential given the density of previously recorded archaeology in the immediate area...Although there is anecdotal evidence of an existing pipeline...which might indicate this area has been previously disturbed, this has yet to be confirmed. Again, the Planning Authority is concerned that not enough detail and investigations have been carried out and submitted with this application for an informed decision to be taken. The proposed final design should be based on a programme of advance site investigations which should clearly inform the detailed design of the proposed development. **ADDITIONAL INFORMATION**

The Heritage Officer Report states:

*"...the site is potentially rich in archaeology, given the results of previous excavations...The mitigation outlined in Section 5.1 refers in particular. As the pipeline will impinge on the Zone of Influence of important archaeological features, there is a Statutory requirement to notify the National Monuments Service under Section 5 930 of the National Monuments (Amendments) Act (1994), and detailed mitigation will need to be agreed with NMS...I suggest the views of NMS are sought on this one*

Having regard to the potential for rich archaeology on this site and in proximity to the site(s) of the proposed development the Planning Authority seeks the applicant to contact the NMS and submit documentation and mitigation measures by way of **ADDITIONAL INFORMATION**.

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In Summary, in relation to Environmental Impact, the following Additional Information is required:

- Clarification of matters detailed in the Appropriate Assessment Screening
- Further details of mitigation in place for accidental discharge of toxic materials
- Ecological Surveys
- Potential to monitor chemicals with pH probe with automatic shutdown
- Further details on surface water discharge, relating to silt and the potential to impact the River Liffey.

### **Additional Planning Concerns:**

1. The Planning Authority seeks the following information:
  - a. The volume of storage of sulphuric acid
  - b. The volume of storage lime
  - c. Details of the processes of de-alkalisation
  - d. Environmental protections provided for each of the above.
2. It is noted that there are features indicated on the plans that lie outside the redline. If so, then a revised Site Layout Plan which clearly shows all proposed works within the red line boundary should be provided for full assessment, and if deemed to be significant the application should be readvertised. \*The applicant may wish to investigate the possibility that the associated network of underground pipelines/connections (or part thereof) may potentially be exempted development. If so, this should be clarified and stated under which section of the Primary or Secondary legislation it may be deemed exempted development. **Additional information.**
3. A bat survey of the proposed *existing workshop and (defunct) Activated Carbon Building*, which is to be demolished.

### **Landscape and Visual Impact**

A Landscape and Visual Impact Assessment was submitted with the application. In accordance with the Landscape Character Assessment of South Dublin County, the site is located within the 'Urban' character area, although it is immediately adjacent to the Liffey Valley Landscape Character Area. The Planning Authority has assessed the proposed development and consider that a number of buildings would have a significant visual impact:

1. *Demolition of existing workshop and (defunct) Activated Carbon Building*

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Adjacent the old/northern Treatment Plant Building -

This is located within the larger red line to the north of the site, adjacent to the Salmon Leap Inn. Details of this are set out on dwg 11118-RHL-LP2-XX-DR-PL-0007 and 11118-RHL-LP2-XX-DR-PL-0016. No plans or elevations have been provided. The applicant is requested to address this via **additional information**. It was not apparent from the site inspection that the buildings could be viewed from the public road.

#### 2. *Sulphuric Acid Storage and Dosing Facility Building*

A single storey structure with an approximate overall height of 8.7 metres proposed adjacent to the new/southern Treatment Plant Building.

This is located within the red line to the south of the site. Details of this are set out on dwg 11118-RHL-LP2-XX-DR-PL-0015 and 11118-RHL-LP2-XX-DR-PL-0016.

It is noted that this building has not been included within the visual assessment presented in the photomontages. The applicant is requested to address this via **additional information**. It is understood that there are public rights of way through the site and the applicant is requested to provide details of the impact from public viewpoints only.

#### 3. *Lime Storage & Dosing Facility Building*

A single storey up to approximately 11 metres in height) adjoining the old/northern Treatment Plant Building. This is located within the larger red line to the north of the site, adjacent to the Salmon Leap Inn. Details of this are set out on dwg 11118-RHL-LP2-XX-DR-PL-0012 and 11118-RHL-LP2-XX-DR-PL-0013.

This building, along with number 4 below, would have a significant visual impact from the north. Mitigation measures should be included to reduce the visual impact of this building.  
**ADDITIONAL INFORMATION.**

#### 4. *External storage silos (2) with external staircase*

The storage silos have an approximate height of 12.3 metres and are partially enveloped with a perforated metal architectural screen, and ancillary plant and equipment. This is located within the larger red line to the north of the site, adjacent to the Salmon Leap Inn. Details of this are set out on dwg 11118-RHL-LP2-XX-DR-PL-0012 and 11118-RHL-LP2-XX-DR-PL-0013. An assessment of these structures is included in the 'Impact on the Salmon Leap Protected Structure' section of this report.

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5. *Reconfiguration and repurposing for use as a De-Alkalisation Plant of existing (disused) High-Lift Pump Hall*

Located within the old/northern Treatment Plant Building. The applicant is requested to indicate the location of this and provide plans and elevations. If this is included within already approved plans, then the area should be delineated. This should be addressed via **additional information**. As this area seems to be located within an existing building, it is unlikely to cause a significant visual impact. Notwithstanding this, the use of the structure is changing to become a de-alkalisation plant. The Planning Authority require further details to understand how the use will be operated and the potential environmental impact that it may have: volume of materials, how the materials enter/exist the building, details of the processes. **ADDITIONAL INFORMATION**.

6. *New ancillary Workshop Building*

A single storey structure up to approximately 4.5 metres in height and located to the rear/south of the 'old/northern Treatment Plant Building. This is located within the smaller red line to the north of the site. Details of this are set out on dwg 11118-RHL-LP2-XX-DR-PL-0011. It is not apparent from the photomontages submitted that this structure would be visible from public viewpoints. The building would be constructed adjacent to existing built areas and would not encroach upon open spaces. There are concerns regarding the noise from this element of the proposal. Noise has also been raised as a concern by the EHO, as set out below.

7. *Temporary and enabling works to facilitate construction and continued / uninterrupted operation of the Treatment Plant site*

The applicant states that these are set out in Section 1.8 of the Planning Statement (prepared by Ryan Hanley). However, this is not apparent, and the applicant is requested to submit a schedule of these works via **additional information**.

The report submitted by the applicant concludes:

*"Landscape Impacts and Effects*

*The magnitude of change of the Landscape Character is considered low (in its immediate environs) to Negligible in the wider Liffey Valley landscape. The landscape sensitivities range from Medium to high resulting in a landscape effect of Moderate and Adverse Importance. However this effect is primarily visual and very localised... The land use is already established and similar structures are present in the WTP site".*

*Visual Impacts and Effects*

*Three viewpoints were assessed representative of this localised landscape change.*



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*Viewpoint 1 from the Leixlip Road experiences an effect of Moderate and Neutral importance reflecting the fact that the current view is not of a high quality.*

*Viewpoint 3 at the entrance to the Leixlip Hydro Station also experiences an effect of Moderate and Neutral Importance for similar reasons and also due to the mitigating effect of the proposed architectural screening simplifying the form and design language of the industrial structures.*

*Viewpoint 2 has been analysed in some depth and reflects a sequence of views from north of the river, across Leixlip Bridge to the Salmon Leap Inn. It illustrates a change in visibility and therefore effect from Important and Adverse to Low Importance and Neutral and then no change. This reflects the typical movement experienced (by vehicles and pedestrians) along a road corridor albeit in a highly scenic and recognised location and corridor.*

*Mitigation in the form of architectural screening has not reduced the visibility of the proposed development, however it has altered them ore industrial language and character of the silos (now enclosed), to a more neutral, simple and acceptable form, where visible as a backdrop in the generally scenic composition of the pub, bridge and river landscape”.*

In terms of landscape character, it is noted from the Landscape Character Assessment for South Dublin (Minogue and Associates with Aegis Archaeology, Michael Cregan and Geoscience Ltd), 2015, that the area is characterised as ‘Urban’ and is not included within the ‘Liffey Valley’ landscape character area. It is however, adjacent to it and the introduction of significant structures, whilst not changing the overall landscape impact, has an impact on the character of the immediate area.

VP1 – The Protected Structure (Salmon Leap Inn) is visible within this area. However, it is noted that other industrial structures are also highly visible. The Planning Authority are of the opinion that the proposed development would not have a significant impact from this view.

VP2 – The Planning Authority concurs that the mitigation has not altered the visibility of the structures, however, it is still considered to have a significant industrial appearance, in a sensitive context.

VP3 – Whilst not as sensitive as VP3, VP2 is less industrial than VP1, with lower buildings similar to agricultural sheds. Additional screening would be beneficial in this area.

The applicant has not provided sufficient details of the visual impact regarding the some features proposed, as has focused on the structure to the rear of the Salmon Leap Inn. The applicant should be requested to submit revised proposals that comprise elements that mitigate the visual impact that each of the structures may have. **ADDITIONAL INFORMATION.** The applicant’s response to the Additional Information request should include additional photomontages.

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It is noted that a single contiguous elevation has been provided. The applicant should be requested to submit further contiguous elevations via **additional information**. This should include side and rear contiguous elevations.

### **Impact on the Salmon Leap Protected Structure**

The Planning Authority had discussions with Irish Water representatives 28<sup>th</sup> July 2021. At this meeting the visual aspect of the proposed two-silos to be located above and behind the Salmon Leap public house, a Protected Structure (Salmon Leap Public House, RPS Ref. 009), was discussed. The Planning Authority requested that these structures, due to their immense visual impact should be either 'greened' through the provision of a green wall and if this was not practical for the proposed use, that the materials proposed for the structure (or a curtain wall) should reflect the contextual cues of the immediate area. The Planning Authority suggested the use of stone and wrought iron, which are found on the Salmon Leap Bridge. The applicant has included three options but has proposed Option 3 which comprises '*a perforated metal architectural screen*', which would encase the storage silos.

The Architectural Conservation Officer (ACO) has stated that '*the insertion of the 2 no. storage silos at this location is an unfortunate consequence of the proposed development, however the Waste Treatment is an established use on the adjoining site and the proposed works are required as part of essential upgrade works*' and concludes '*it is considered that final detail of the design and size of the perforations should be submitted for agreement and approval by the undersigned. A sample of the material and finish should be provided along with images of the final design elements.*'

The Planning Authority is of the opinion that the proposed development would have a significant impact on the visual amenity of the area, especially viewed from Salmon Leap Bridge. It is noted from Section 1.7 (1) of the planning statement that the location of the building is fixed. It is, therefore, considered that the only matter which can be influenced is the visual appearance. Having regard to the initial discussion that took place with Irish Water, the issues raised by the ACO and that additional information is being sought for other issues, that the applicant should be requested to reconsider the proposed materials and curtaining of the two silos and seek to incorporate contextual cues from the area, specifically the use of stone and wrought iron should be the primary consideration. The re-design of each of these structures/curtain wall of these structures should incorporate stone and wrought iron. Revised photomontages to be submitted. **Additional Information.**

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### Environmental Health

The EHO has stated

In Summary, in relation to design, the following Additional Information is required:

1. The proposed two-silos to be located above and behind the Salmon Leap public house, a Protected Structure (Salmon Leap Public House, RPS Ref. 009) should be redesigned and be constructed of/curtain wall to be constructed of stone and wrought iron to complement the Salmon Leap bridge.
2. It is noted that the *Sulphuric Acid Storage and Dosing Facility Building* has not been included within the visual assessment presented in the photomontages. Provide details of the impact from public viewpoints only.
3. Mitigation measures should be submitted to reduce the visual impact of the *Lime Storage & Dosing Facility Building*.
4. The proposed *reconfiguration and repurposing for use as a De-Alkalisiation Plant of existing (disused) High-Lift Pump Hall*:
  - a. has not been fully detailed in the documentation/drawings submitted. It is located within the old/northern Treatment Plant Building. The applicant is requested to indicate the location of this and provide plans and elevations. If this is included within already approved plans, then the area should be clearly delineated.
  - b. the use of the structure is changing to become a de-alkalisation plan. The Planning Authority require further details to understand how the use will be operated and the potential environmental impact that it may have: volume of materials, how the materials enter/exist the building, details of the processes should be submitted.
5. The *temporary and enabling works to facilitate construction and continued / uninterrupted operation of the Treatment Plant site* have not been clearly scheduled or detailed. The applicant is requested to submit a schedule of these works
6. *Demolition of existing workshop and (defunct) Activated Carbon Building* no plans or elevations have been provided for the structures to be demolished
7. *Contiguous elevations* It is noted that contiguous elevations have been provided along the principal elevations to north and west. The applicant is requested to submit further contiguous elevations. This should include side and rear contiguous elevations.

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*“The proposed development is quite substantial and proposes to expand and intensify the existing water treatment plant. Whilst this is likely to have an overall positive impact by providing greater capacity to treat water this intensification could generate a higher noise output to the area.*

*The components outlined below have the potential to increase the noise output:*

- *Construction of a new dosing facility up to 8.7metres height*
- *Construction of a second dosing facility up to 11 metres in height*
- *Repurposing of disused high lift pump*

*The main concerns from Environmental Health relate to noise from the proposed structure and its potential impact on the residential property located directly across the street. There is a residential dwelling situated on the R148 road across from the Salmon Leap Inn. The newly proposed lime dosing facility is within 50 metres from this residential receiver and therefore it is important to ensure that this proposal will generate a noise impact on this location.*

*The Environmental Health Department note that under section 3.15 of the planning report submitted by Irish Water the report makes a brief reference to noise. It states that Noise emissions will not ‘materially alter’ from the existing pattern. However the report fails to provide any further detail with regard to the proposed noise impact.*

*Given the close proximity of the new proposed plant to the existing residential receiver the Environmental Health Department require an acoustic assessment to be carried out”.*

Additional information is requested.

#### **Roads**

The Roads Department has requested Additional Information and the report states:

##### **1. “Traffic and Transport Assessment (TTA)**

*“In terms of traffic arising from the proposed development the applicant submitted planning report state that no material change to the existing pattern of activity would arise. Staff movements would not be anticipated to alter as a result of the proposed development, with existing workplace patterns remaining largely as existing, i.e., no additional employment is envisaged on site.*

##### **2. Access**

*The applicant has proposed existing accesses one at R-148 beside ESB grid station of the proposed development and second existing access is at Cooldrinagh Lane to the south east of the*

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*proposed development and a third access for the proposed development is at the north of the water treatment plant beside river Liffey.*

#### **a. Fire Tender and Bin Collection Access**

*Swept path analysis has been submitted which demonstrates that an HGV can access and egress the development from all existing excesses.*

#### **3. Car Parking:**

*No details have been provided in relation to proposed and existing no. car parking spaces at the proposed development.*

#### **a. The maximum car parking standards are set out below:**

*please refer to SDCC car parking spaces standards (Table 11.23: Maximum Car Parking Rates).*

#### **b. EV Parking**

*No details have been provided in relation to proposed EV charging parking spaces at the proposed at the proposed car parking, 10% of the total no. vehicular parking spaces to be equipped with electrical charging points.*

#### **c. Mobility Impaired parking**

*No details have been provided in relation to proposed Mobility impaired parking. The applicant shall provide a 5% of the total no. vehicular parking spaces for mobility impaired users.*

#### **4. Bicycle Parking:**

*The application did not include any details on bicycle parking spaces. The applicant shall provide details on bicycle parking spaces for the proposed development. please refer to SDCC bicycle parking spaces standards (Table 11.22: Minimum Bicycle Parking Rates)*

#### **5. Pedestrian Permeability:**

*No details of proposed road or footpath build-ups have been provided. A dimensioned drawing should be submitted which shows the proposed dimensions of footpaths, parking bays, roads and entrance widths. In addition, a swept path analysis should be submitted which shows that a standard large car can access and egress the perpendicular parking spaces to be provided.*

#### **6. Bin Collection:**

*The applicant state that waste collections would not materially alter as a result of the proposed development, with exiting arrangements remaining as existing.*

#### **7. Public Lighting:**

*No site lighting design has been submitted with this application. Prior to commencement of the development a developed site lighting design shall be submitted and agreed in writing with South Dublin County Council Lighting Department. Once agreed, the scheme shall be*

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*constructed/installed to taking in charge standards at the expense of the developer and to the satisfaction of South Dublin County Council Lighting Department”.*

Additional information has been requested.

### Services and Drainage

Irish Water has raised no objections, subject to conditions. Water Services has requested **additional information** regarding SuDS, surface water attenuation calculations.

### Aviation Safety

The file was referred to the Irish Aviation Authority. No comments were received.

11.6.6(iii) states:

*“Generally, development will be acceptable in this zone, subject to the development having an OD height below the height restriction of the Inner Horizontal Surface (generally 45 metres above the elevation datum of the Aerodrome). In general, this will be applicable to development above the prevalent building height (based on OD) of the area. The Inner Horizontal Surface of Casement is 86.6 metres OD and Weston is 91.3 metres OD. Similar to development within the Outer Approach Surface, the applicant should demonstrate that the proposed development is not an obstacle to the Aerodrome airspace. The applicant shall be required to detail the OD height of the proposed development, in the context of the relevant Aerodrome”.*

IE9 Objective 3 is: *“To prohibit and restrict development in the environs of Weston Aerodrome in the following ways:*

...

*b). By applying height restrictions to development in the environs of the Aerodrome.*

...”.

The elevations provided indicate that the buildings would be significantly below 91.3 OD

### Conclusion

Having regard to the:

- provisions of the South Dublin County Development Plan 2016-2022,
- the sensitivities of the site and its proximity to the River Liffey, Protected Structures, National Monuments and the potential for seepage into the river which reaches Dublin Bay,
- the established character of the area, and
- the scale, design and standard of the proposed development,

it is considered that **Additional Information** is required to ensure that the proposed development would be in compliance with Council policy, would provide be in accordance with the proper planning and sustainable development of the area.

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### Recommendation

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

1. The applicant is requested to:

(1) Clarify and provide further detail on the following matters, raised in the Appropriate Assessment Screening Report:

(a) Section 3 (8) of the report states 'the following temporary works are envisaged...the silos are to be placed in a depressed bund, approximately 1m below existing ground level, in order to reduce the visual impact of the height of the structures; this will be investigated through the detailed design of the project'. The Planning Authority are concerned that the screening has been carried out using information that may not represent the final design of the project. Furthermore, it is unclear if a scenario of leakages occurring or a catastrophic event taking place has been taken into consideration. The likelihood of damage that may occur to the River Liffey and the receiving environment and potential impact on Natura 2000 sites at Dublin Bay and residential amenity should form part of the screening process.

(b) The potential of the River Liffey flooding and the implications of chemicals materials leeching into the river and ground.

(c) Undergrounding pipeline - It is unclear what measures are to be in place to prevent failure in pipes and the possible negative impact on the environment.

(d) The report suggests sub-optimal surveys were carried out in February 2021. The Planning Authority request a more recent survey at an appropriate time. Although it is not ideal, an ecological walkover in December is preferred to a survey carried out in February due to the stages in plant growth.

(e) Section 3.2 – Proposed Design Compartmentalised building – The structure contains tankage within bunds for the storage of 96% sulphuric acid. Delivery of the acid will take place by trucks. It is unclear what safeguards will be in place for any potential spillage or catastrophic event.

(f) Construction of an acid dosing chamber on the existing 1,400 raw water supply. It is unclear what safeguards will be in place for any potential spillage or catastrophic event.

(g) Relocation of key pipework infrastructure to the front of the control building at Old Leixlip WTP and construction of ancillary chambers. It is unclear what safeguards will be in place for any potential spillage or catastrophic event.

The applicant is requested to liaise with the Heritage Officer and Inland Fisheries prior to responding to all items raised in Item 1.

(2) Clarify the following:

(a) Whether it is possible for the facility to be monitored using an online pH probe with automatic shut down when the pH deviates from an acceptable range.

(b) The application states that de-watering from excavations will be via siltation boxes and silt bags before discharging to the local sewer network. The applicant is requested to

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set out further details of the surface and foul network. The applicant is requested to note that any discharge to surface water and the River Liffey must comply with Surface Water Regulations 2009.

2. (1) The applicant has set out a rationale within the EIA Screening Report why an EIAR is not required for the development. However, additional information is required to enable the screening out of the need for an EIAR for this proposed development. In particular, it is not clear if the proposed works will result in an increase in capacity at the site or if it will increase in size greater than 25% or an amount equal to 50% of the appropriate threshold. The applicant is requested to clearly lay out what is being proposed on the site and what its purpose is and if it will increase in size greater than 25% or an amount equal to 50% of the appropriate threshold. If it does increase the size or amount an EIAR should be submitted.

(2) The applicant is also requested to clarify the following matters, set out in the EIAR Screening:

(a) Environmental Impact Assessment Screening Report – Archaeology

The Archaeological Section of the Environmental Impact Assessment Screening Report was prepared by Ryan Hanley Consulting Engineers. The following issues arise:

i. Text, similar to that stated in the Appropriate Assessment Screening Report, prepared by Ryan Hanley Consulting Engineers, is included in Section 2.3(8) of this report and states 'the following temporary works are envisaged...the silos are to be placed in a depressed bund, approximately 1m below existing ground level, in order to reduce the visual impact of the height of the structures; this will be investigated through the detailed design of the project'. The Planning Authority request that all screening should take place on the detailed design.

ii. Archaeology, specifically relating to the 195m pipeline. This pipeline, it is stated, has 'the potential to have a permanent, direct, negative impact on previously unrecorded archaeology across the western side of the general site within an area of high archaeological potential'. Section 6 Site Investigations states 'a programme of advance site investigations may be undertaken to inform the detailed design of the proposed development'. The Planning Authority request that all screening should take place on a proposed detailed design. Furthermore, alternative routes for this pipework should be investigated and relocated as far away from the two recorded monuments as possible. An existing roadway is located to the west of the boundary, this should be investigated for a possible conduit of the piping as the ground at this location has already been disturbed.

iii. The conclusions in this report states that the landscape is an 'area of high archaeological sensitivity as attested by the numerous archaeological finds, features and deposits encountered over previous development-led excavations'...the majority of the [subject site(s)] have been subject to intensive archaeological investigations in advance of various construction phases...the proposed acid storage building and dosing facility...are to be located in a greenfield area...this area has been substantially altered and



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disturbed...as indicated in previous planning applications...where dosing lines are proposed, as indicated in [sic] Figure 1, Figure 2 & Figure 5...there remains moderate archaeological potential given the density of previously recorded archaeology in the immediate area...Although there is anecdotal evidence of an existing pipeline...which might indicate this area has been previously disturbed, this has yet to be confirmed. The Planning Authority is concerned that insufficient detail and investigations have been carried out and submitted with this application for an informed decision to be taken. The proposed final design should be based on a programme of advance site investigations which should clearly inform the detailed design of the proposed development. The applicant is requested to address this.

(3) Archaeology: Having regard to the potential for rich archaeology on this site and in proximity to the site(s) of the proposed development the Planning Authority requests that the applicant contact the NMS and submit documentation to indicate this has taken place. Appropriate mitigation measures, as agreed with the NMS, should be detailed in the Additional Information response.

3. In accordance with Section 11.2.0 of the Development Plan 2016 - 2022: 'All medium to large scale development proposals (10 dwellings and above and/or commercial, retail or community developments of 1,000sq.metres and above, or as otherwise required), shall be accompanied by a Design Statement. The Design Statement should consist of:
  - A Site Analysis
  - A Concept Plan and/or Masterplan
  - A statement based on the design criteria set out in the relevant National Planning Guidance documents listed in Section 11.2.0 and/or tables 11.17 and 11.18 as outlined below.
  - A statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets'.The applicant is requested to provide a revised design statement, in accordance with the requirements of the CDP.

4. (1) The Planning Authority had discussions with Irish Water representatives 28th July 2021. At this meeting the visual aspect of the proposed two-silos to be located above and behind the Salmon Leap Public House, a Protected Structure (Salmon Leap Public House, RPS Ref. 009), was discussed. The Planning Authority requested that these structures, due to their immense visual impact in proximity to a Protected Structure and highly visible site should be either 'greened' through the provision of a green wall and if this was not practical for the proposed use, that the materials proposed for the structure (or a curtain wall) should reflect the contextual cues of the immediate area. The Planning Authority suggested the use of stone and wrought iron, which are found on the Salmon Leap Bridge. The applicant has included three options but has proposed Option 3 which comprises 'a perforated metal architectural screen', which would encase the storage silos. The Planning Authority is of the opinion that the proposed development would have a

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significant adverse impact on the visual amenity of the area, especially viewed from Salmon Leap Bridge.

It is noted from Section 1.7 (1) of the planning statement that the location of the building is fixed. It is, therefore, considered that the only matter which can be influenced is the visual appearance. Having regard to the initial discussion that took place with Irish Water and the issues raised by the Architectural Conservation Officer that the applicant is requested to submit a redesign of the structures/curtaining of the two silos, which incorporate contextual cues from the area, specifically the use of stone and wrought iron found at the Salmon Leap Bridge. Revised photomontages to be submitted.

(2) It is noted that the Sulphuric Acid Storage and Dosing Facility Building has not been included within the visual assessment presented in the photomontages. Provide details of the impact from public viewpoints only.

(3) Mitigation measures should be submitted to reduce the visual impact of the Lime Storage & Dosing Facility Building.

(4) The proposed reconfiguration and repurposing for use as a De-Alkalisiation Plant of existing (disused) High-Lift Pump Hall:

(a) has not been fully detailed in the documentation/drawings submitted. It is located within the old/northern Treatment Plant Building. The applicant is requested to indicate the location of this and provide plans and elevations. If this is included within already approved plans, then the area should be clearly delineated.

(b) the use of the structure is changing to become a de-alkalisation plan. The Planning Authority require further details to understand how the use will be operated and the potential environmental impact that it may have: volume of materials, how the materials enter/exist the building, details of the processes should be submitted.

(5) The temporary and enabling works to facilitate construction and continued / uninterrupted operation of the Treatment Plant site have not been clearly scheduled or detailed. The applicant is requested to submit a schedule of these works

(6) Demolition of existing workshop and (defunct) Activated Carbon Building no plans or elevations have been provided for the structures to be demolished

(7) Contiguous elevations It is noted that contiguous elevations have been provided along the principal elevations to north and west. The applicant is requested to submit further contiguous elevations. This should include side and rear contiguous elevations.

5. (1) The Planning Authority seeks the following information:

- a. The volume of storage of sulphuric acid
- b. The volume of storage lime
- c. Details of the processes of de-alkalisation
- d. Environmental protections provided for each of the above.

(2) It is noted that there are features indicated on the plans that lie outside the redline. If this is the case, then a revised Site Layout Plan which clearly shows all proposed works within the red line boundary should be provided for full assessment, and if deemed to be

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significant the application should be readvertised.

\*The applicant may wish to investigate the possibility that the associated network of underground pipelines/connections (or part thereof) may potentially be exempted development. If so, this should be clarified and stated under which section of the Primary or Secondary legislation it may be deemed exempted development.

(3) A bat survey of the proposed existing workshop and (defunct) Activated Carbon Building, which is to be demolished.

(4) The following plans, elevations and photomontages are requested:

- i. elevations / plans for structures to be demolished
  - ii. details / location of the De-Alkalisation Plant of existing (disused) High-Lift Pump Hall
  - iii. full contiguous elevations, including side and rear contiguous.
  - iv. revised screening of the Lime Storage & Dosing Facility Building and silos. The Planning Authority has significant concerns regarding the visual impact of the proposal and the applicant is requested to reconsider the materials used in the screen. This should be redesigned and be constructed of/curtain wall to be constructed of stone and wrought iron to complement the Salmon Leap bridge. Revised plans and photomontages should be provided indicating any changes.
  - v. The applicant is requested to provide a revised photomontage to include the Sulphuric Acid Storage and Dosing Facility Building. Viewpoints should be publically accessible.
- (5) The applicant is requested to provide a schedule of temporary and enabling works to facilitate construction and continued/uninterrupted operation of the Treatment Plant site.

6. The applicant is requested to provide an acoustic assessment undertaken by a suitably qualified acoustic consultant describing and assessing the impact of noise emissions from the proposed alterations to include the accumulative noise impact from existing on-site activities. The investigation must include, but not be necessarily limited to, the following:
  - (a) The identification of any neighbouring noise sensitive receivers who may be potentially impacted by the proposal
  - (b) The identification of all operations conducted onsite as part of the development proposal that are likely to give rise to a public nuisance for the neighbouring noise sensitive receivers.
  - (c) Distances between the development and the nearest noise sensitive receiver and the predicted level of noise (L<sub>aeq</sub>, 15min) from any development activities when assessed at the boundary of that receiver.
  - (d) An assessment of the existing background (LA<sub>90</sub>, 15 min) and ambient (LA<sub>eq</sub>, 15 Min) acoustic environment at the receiver locations representative of the time periods that any noise impacts may occur. NOTE: For the purposes of the assessment background noise includes; noise of the surrounding environment excluding all noise sources currently located on-site.
  - (e) A statement outlining any recommended acoustic control measures that should be

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incorporated into the development to ensure the use will not create adverse noise impacts on the occupiers of any neighbouring noise sensitive properties

7. The applicant is requested to provide:
  - (1) A dimensioned drawing should be submitted which shows the proposed dimensions of footpaths, parking bays, roads and entrance widths. In addition, the applicant is requested to submit a swept path analysis which shows that a standard large car can access and egress the perpendicular parking spaces.
  - (2) a revised layout, showing a detailed design of all vehicular access points, including a visibility splay in both directions for vehicles exiting the proposed development.
  - (3) details on existing and proposed car parking spaces for the proposed development. Please refer to SDCC Car parking spaces standards (Table 11.23: Maximum Car Parking Rates).
  - (4) details on bicycle parking spaces for the proposed development. please refer to SDCC bicycle parking spaces standards (Table 11.22: Minimum Bicycle Parking Rates).
8. The applicant has not proposed any SuDS (Sustainable Drainage Systems) features for the proposed development.

The applicant is requested to submit:

  - (1) a drawing in plan and cross sectional views clearly showing proposed Sustainable Drainage Systems (SuDS) features for the development.

Examples of SuDS include

  - Green Roofs, Blue Roofs
  - Rain Gardens , Planter boxes with overflow connection to the public surface water sewer.
  - Permeable Paving
  - Grass paving, Grasscrete
  - Porous Asphalt
  - Rain Water butts.
  - Other such SuDS

There is no surface water attenuation proposed for the development.

  - (2) a report showing surface water attenuation calculations for proposed development. Include site area and areas of different surface types and their respective run off coefficients.
  - (3) a drawing showing surface water layout for proposed development and show what surface water attenuation is proposed. If SuDS does not provide enough surface water attenuation then an arched type attenuation system can be used to attenuate surface water for proposed development.
9. No site lighting design has been submitted with this application. The applicant is requested to submit a site lighting design.

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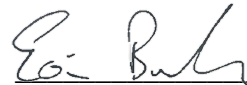
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REG. REF. SD21A/0272

LOCATION: Leixlip Water Treatment Plant Site, Cooldrinagh & Backwestonpark lands,  
Leixlip, Co. Dublin



Tracy McGibbon,  
A/Senior Executive Planner



Eoin Burke,  
Senior Planner

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

Date: 29-Nov-2021



Mick Mulhern, Director of Land Use,  
Planning & Transportation