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Land Use, Planning & Transportation Department
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PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Decision Order Number: 1535	Date of Decision: 29-Nov-2021
Register Reference: SD21A/0272	Registration Date: 04-Oct-2021

Applicant: Irish Water

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 & Backwestonpark lands,
Leixlip, Co. Dublin

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 04-Oct-2021 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. The 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 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 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 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-Alkalisation 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 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 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 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_{aeq}, 15min) from any development activities when assessed at the boundary of that receiver.
 - (d) An assessment of the existing background (LA₉₀,15 min) and ambient (L_{Aeq},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 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.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked “ADDITIONAL INFORMATION” and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD21A/0272

Date: 30-Nov-2021

Yours faithfully,

Brian Connolly
for Senior Planner