

Land Use, Planning & Transportation Department,
South Dublin County Council,
County Hall Tallaght,
Dublin 24,
D24 A3X

17th December 2021
[By Courier]

Dear Sir/Madam,

RE: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION IN RELATION TO A PROPOSED EXTENSION OF AN EXISTING BUS DEPOT AT 12, BALLYMOUNT ROAD LOWER, DUBLIN 12.

South Dublin County Council Reg. Ref. SD21A/0213

1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, 80 Harcourt Street, Dublin 2 is instructed by our client, Go-Ahead Ireland, to respond to the *Additional Information Request* issued by South Dublin County Council on 27th September 2021. The proposed development relates to the extension of an existing bus depot to provide additional bus parking, car parking, motorcycle parking and bicycle parking facilities and associated site works at the above-referenced address.

The *Request for Additional Information* outlines 6 no. points, which would be required to be addressed in relation to the proposed development. These are outlined and responded to in greater detail below.

This Response was prepared in association with the following members of the design team:

- Waterman Moylan, Consulting Engineers
- Ronan Mac Diarmada & Associates Ltd. Landscape Architects & Consultants (RMDA)
- Arborist Associates Ltd.
- Redline Studios

A full list of the enclosed supporting assessments, reports and drawings accompanying this *Response to Additional Information Request* is provided below in Section 3.0 'Summary of Enclosures'.

TOWN PLANNING CONSULTANTS



2.0 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

2.1 Item No. 1

Item No.1 of the *Request for Additional Information* states:

'The Planning Authority has concerns regarding the visual impact of the proposed development. The applicant is requested to provide the following information, to enable a full assessment of the visual impact:

- 1. 'As permitted' elevations (under SD17A/0428).*
- 2. Photomontages indicating existing, as permitted (under SD17A/0428) and as proposed development. These should show the site and the wider area.*
- 3. Full sections through the site, north/south and east/west, indicating existing and proposed levels'.*

Response

In response to Item 1(1) of the *Additional Information Request*, we refer the Planning Authority to the enclosed *Engineering Response to RFI Report* and the accompanying '*Atelier Architects Drg No P300 Rev 03 Proposed Elevations*', prepared by Waterman Moylan, Consulting Engineers.

In response to Item 1(2) of the *Additional Information Request*, we refer the Planning Authority to the enclosed *Go-Ahead - Ballymount Depot Photo Montages Booklet*, prepared by Redline Studios.

In response to Item 1(3) of the *Additional Information Request*, we refer the Planning Authority to the following enclosed drawings, prepared by RMDA Landscape Architects:

- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 1. Landscape Plan*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 2. Proposed Landscape Section A-AA*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 3. Proposed Landscape Section B-BB*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 4. Existing Sections A-AA*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 5. Existing Sections B-BB*



2.2 Item No. 2

Item No. 2 of the *Request for Additional Information* states:

'There are concerns with the lack of information submitted in relation to existing trees and hedgerows within the subject site area. The applicant is requested to submit a detailed tree and hedgerow survey report for the trees within the subject site area. This tree survey should be undertaken by a suitably qualified arborist. The report should provide detailed information on the condition and health of the existing trees and it should also clearly detail what impacts the development will have on the trees but also potentially the tree roots'.

Response

In response to Item 2 of the *Additional Information Request*, we refer the Planning Authority to the enclosed *Arboricultural Assessment* and accompanying Drawings Nos. BMR002 (Arb Impact Assessment Plan) and BMR001 (Tree Constraints Plan), prepared by Arborist Associates Ltd. In summary, there are 10 no. Category A trees, 4 no. Category B trees, 6 no. Category C trees and 1 no. Category U tree within the subject site, all of which are proposed to be removed.

The proposed removal of 21 No. Trees and 1 no. tree group in total is prudent to facilitate additional parking and the introduction of electrical infrastructure for the electrification of the bus fleet. Under the Outer Dublin Metropolitan Area (ODMA) contract with the NTA it is proposed that Go-Ahead, and other Dublin contractors, will transition to a zero-tail pipe emission public bus fleet by 2032 to align to the clean vehicle directive (S.I. No. 381/2021) and support GAI's corporate net-zero targets for 2040. The planned NTA fleet of 100% electric buses will be charged overnight using static chargers with a smart charging capacity, spreading the electricity load to ensure vehicles are charged fully in order of departure and will enable GAI to generate approx. 8% reduction in CO2 emissions year on year from 2025. The first buses are expected to be delivered in 2024, and go operational in 2025 on Dublin bus routes, primarily routes close to the Depot.

In parallel with the planning process for phase 1 of the planned 100% electric fleet for Ballymount, Go-Ahead have been in initial discussions with the ESB. This follows an analysis of the GAI route network to understand the required power loads to be requested from the ESB. An application for this additional power is in hand should permission be granted under the subject application. Go-Ahead have experience in developing electric bus sites across the UK and have used best practice to support the design and development of this site.

We submit that the proposed development is wholly in accordance with the *Climate Action Plan 2021* which seeks to expand the public transport fleets and remove the reliance on private vehicles. This Plan also aims to replace all buses with electric vehicles nationally by 2035.



In order to offset the loss of the trees as shown in Drawing No. BMR001, prepared by Arborists Associates Ltd., it is proposed to plant 325. no native replacement tree types. In this regard, we refer the Planning Authority to *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 1. Landscape masterplan*, prepared by RMDA Landscape Architects.

2.3 Item No. 3

Item No. 3 of the *Request for Additional Information* states:

'The planting of more trees especially in the urban environment is considered one of the key strategies in mitigating the impacts of climate change. Trees sequester carbon and store it during its photosynthesis process. In addition, trees can also:

- *Prevent flooding*
- *Reduce city temperature*
- *Reduce pollution*
- *Keep soils nutrient-rich*

The applicant is requested to provided information on additional tree planting as part of the landscape proposals'.

Response

In response to Item 3 of the *Additional Information Request*, we refer the Planning Authority to the enclosed *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 1. Landscape masterplan* and the *Landscape Rationale*, prepared by RMDA Landscape Architects, shows additional planning as part of the landscaping proposals.

2.4 Item No. 4

Item No. 4 of the *Request for Additional Information* states:

'(a) The current drainage scheme does not fully comply with the objectives of the development plan in terms of Green Infrastructure or as regards the proper implementation of SUDS. There is a lack of SuDS (Sustainable Drainage System) or natural solutions shown for the proposed development.

Natural SUDS features should be incorporated into the proposed drainage system. SUDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022.

The applicant is requested to submit a revised drawing and report to clearly show what SuDS are proposed for the development.



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

The applicant is requested to omit the proposed attenuation tank and provide sufficient SUDS, unless it can be demonstrated that SUDS are not feasible'.

Response

In response to Item 4(a) of the *Additional Information Request*, we refer the Planning Authority to Section 3 of the enclosed *Engineering Response to Request for Additional Information* and the accompanying *Drawing No. 17-130-P200 Rev A Proposed Surface Water Drainage Layout*, prepared by Waterman Moylan, Consulting Engineers.

In response to Item 4(b) of the *Additional Information Request*, we refer the Planning Authority to Section 4 of the enclosed *Engineering Response to Request for Additional Information* and the accompanying *Drawing No. 17-130-P200 Rev A Proposed Surface Water Drainage Layout*, prepared by Waterman Moylan, Consulting Engineers.

2.5 Item No. 5

Item No. 5 of the *Request for Additional Information* states:

'(a) The applicant is requested to submit a revised drawing showing the surface water layout for the development up to and including the point of connection to the public sewer. The drawing should include the location of all AJs, manholes, pipe size, material type and direction of flow.

(b) The applicant is requested to submit a revised drawing showing a petrol interceptor on surface water network prior to surface water entering surface water attenuation system. This is required to reduce the risk of attenuation system being from contaminated from hydro-carbons'.

Response

In response to Item 5(a) and (b) of the *Additional Information Request*, we refer the Planning Authority to Section 5 of the enclosed *Engineering Response to Request for Additional Information* and the accompanying *Drawing No. 17-130-P200 Rev A Proposed Surface Water Drainage Layout*, prepared by Waterman Moylan, Consulting Engineers.



2.6 Item No. 6

Item No. 6 of the *Request for Additional Information* states:

'The applicant is requested to provide a revised layout plan indicating a. a visibility splay of 2.0m x 45m in both directions from the entrance. Sightlines should be to the near side edge of the road to the right-hand side of the entrance and to the centreline of the road to the left-hand side of the entrance (when exiting). b. 5% of vehicular parking spaces for mobility impaired users, and 10% vehicular parking spaces to be equipped with electrical charging'.

Response

In response to Item 6(a) of the *Additional Information Request*, we refer the Planning Authority to Section 6 of the enclosed *Engineering Response to Request for Additional Information* and the accompanying *Drawing No. 17-130/P107 Rev A Site Layout – Proposed*, prepared by Waterman Moylan, Consulting Engineers.

In response to Item 6(b) of the *Additional Information Request*, we refer the Planning Authority to Section 7 of the enclosed *Engineering Response to Request for Additional Information* and the accompanying *Drawing No. 17-130/P107 Rev A Site Layout – Proposed*, prepared by Waterman Moylan, Consulting Engineers.



3.0 SUMMARY OF ENCLOSURES

Six copies of the following documents and related drawings are enclosed as part of this Response to Further Information Request:

Waterman Moylan, Consulting Engineers

- *Engineering Response to Request for Additional Information (Reg Ref SD21A/0213)*
- *Drawing No. 17-130-P107-Site Layout - Proposed-Rev A*
- *Drawing No. 17-130-P200-Proposed Surface Water Drainage Layout-20211118*
- *Drawing No. 17-130-P250-Elevations – Existing*
- *Drawing No. Atelier Drg No P300 Rev 03 Proposed Elevations*

Ronan Mac Diarmada & Associates Ltd. Landscape Architects & Consultants (RMDA)

- *Landscape Rationale*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 1. Landscape Plan*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 2. Proposed Landscape Section A-AA*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 3. Proposed Landscape Section B-BB*
- *Drawing No. 1584 – Go Ahead Bus Depot - Ballymount - Dwg 4. Existing Sections A-AA*
- *Drawing No. 1584 - Go Ahead Bus Depot - Ballymount - Dwg 5. Existing Sections B-BB*

Arborist Associates Ltd.

- *Arboricultural Assessment and the accompanying*
- *Drawings Nos. BMR002 (Arb Impact Assessment Plan)*
- *Drawing No. BMR001 (Tree Constraints Plan)*

Redline Studios

- *GoAhead - Ballymount Depot Photo Montages*



4.0 CONCLUSION

This submission addresses, in full, issues raised by the Planning Authority in the *Request for Additional Information* dated 27th September 2021.

This submission has been made prior to the deadline date of 26th March 2021.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of this area.

Accordingly, we would ask the Planning Authority to expedite a favourable decision in respect of this application.

Yours sincerely

John Gannon
Director
Tom Phillips + Associates

Encl.