



RDF ARCHITECTS & PLANNING

RDF Architects & Planning Ltd.

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South Dublin County Council
Planning Department,
County Hall Tallaght,
Dublin 24,
D24 A3XC

18th January, 2022

"ADDITIONAL INFORMATION"

RFI Ref: SD21A/0229

Re- SD21A/0229

Retention for 2 bay portal frame, additional floor area to existing industrial unit. Permission for roofing of 2 bay portal frame structure; extension to existing industrial unit; construction of a concrete resurfaced area in main yard; minor internal layout and elevational revisions to existing industrial unit and all associated site works including underground surface water attenuation and related utilities and works.

At Heiton Steel, Ashfield, Naas Road, Clondalkin, Dublin

Agent: RDF Architects & Planning Ltd

Dear Sir/ Madam,

In response to the RFI dated 12th October 2021, please find our response below to the items raised by the South Dublin County Council.

RFI items are listed in italics with response below and related graphics as required.

See enclosed 6 No. copies of drawings/documents/reports as follows :

- RDF 21-037-P-010 Site Survey
- RDF 21-037-P-110 Site Layout Plan & Section AA REV 3
- RDF 21-037-P-120 Proposed Site Layout Plan REV 3
- RDF 21-037-P-200 Existing & Proposed Floor Plans REV 2
- DRA 21194- Drainage Design Report REV 4
- DRA 21194-150 Proposed Drainage Layout REV 4
- All Ireland Pollinator Plan

FC
LAND USE, PLANNING
& TRANSPORTATION DEPT.

28 JAN 2022



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Item 1.

1. Policy in relation to development involving access to national roads and development along such roads is set out in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January, 2012). Section 2.5 of the Guidelines states that the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kph apply. In light of this guidance, the applicant is requested to clarify the following:

- Any changes in use of the land proposed to be covered (377.5sq.m), i.e. what is its current legal use and what is the proposed use. The applicant is requested to detail if operations on this part of the site have changed/will change as a result of the structure to be retained and the proposed roofing. Details of existing and proposed traffic movements for this element of the proposal should be set out.

- The use of the extension to be retained (153sq.m area). The applicant is requested to indicate how this area is utilised and how operations at the site have changed as a result of this proposal. This should include trip generation at present and pre-retention levels.

- The use of the proposed new extension (716 sq.m). The applicant is requested to indicate how this area will be utilised and how operations at the site will change as a result of this proposal. This should include existing and proposed traffic levels.

The existing unit is used as an area for steel storage and has a shot blasting machine for cleaning, stripping, and improving the steel surface.

The new extension is proposed for steel storage (currently stored outside) and a second shot blasting machine. There will be no increase in staff as the existing staff will operate the two machines simultaneously.

There will be no increase in staff generated transport to the site. It is anticipated that weekly deliveries and collection of steel for the development will increase from two to three HGV trips. This is a minimal increase of 1 additional trip per week.



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Item 2.

2. The applicant is requested to provide details for the screening for the proposed structures/structures for retention, including the extended industrial unit and concrete resurfaced area. Details of any existing or proposed landscaping should be provided. This should include landscape plans and/or photographs of screening.

As can be seen from the below images, captured from the adjoining lands (crematorium/graveyard) in early December, that the existing shed (to be extended) is already well screened and (even with winter foliage) is difficult to see through the existing mature hedgerow/Tree belt along the Southern & Eastern Boundaries.

To further address screening a proposed Swail will be located/developed along the South Western and part South Eastern boundary which will in time allow for natural growth to further enhance low to medium height screening along these boundaries.

- Photo from adjoining crematorium & Graveyard showing the existing hedgerow screening between the two sites.



- As can be seen in above image the existing tree line is screening the existing shed unit. Evergreen trees are notable and dense, however there are also deciduous trees which were without leaves in image.

The existing treeline is also of a height that will screen the proposed extension.



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- As can be seen in above image the existing tree line is of a height and density that effectively screens the existing shed and proposed extension. The overall extended shed will run between the Arrows as indicated.



- Summer foliage and screening along Southern boundary at development. As can be seen the existing treeline is of a height and density to adequately screen proposed extension.



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Item 3.

3. The applicant is requested to provide the following information:

(a) Numbers of extra H.G.V. movements that will be generated by this proposal.

(b) Whether shot blasting is already carried out on site.

(c) a revised layout on a scale of not less than 1:100 showing existing and proposed car parking spaces for the proposed retention and extension at the proposed development including 5% of vehicular parking provision for mobility impaired users, and 10% vehicular parking provision equipped with electrical charging points.

(i) The minimum SDCC car parking provision requirements are in table 11.23 of the County Development Plan. Based on these guidelines the minimum spaces required in zone 1 is 1 per 100sqm GFA.

(d) a revised layout on a scale of not less than 1:100 showing the bicycle parking for the proposed retention and development within the development.

(i) External bicycle parking spaces shall be covered. Please refer to 'Table 11.22: Minimum Bicycle Parking Rates'- SDCC County Development Plan 2016-2022.

NOTE as follows:

3(a) One additional H.G.V movement per week is anticipated for proposal.

3(b) Shot blasting is already carried out on site in the shed to be extended.

3(c) & (i) There is no increase in staff numbers, so no additional parking is required. Existing parking layout is shown on 21-037-P-120 Proposed Site Layout Plan

3(d) & (i) There is no increase in staff numbers so no additional bike parking is required. Existing parking layout is shown on 21-037-P-120 Proposed Site Layout Plan



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Item 4

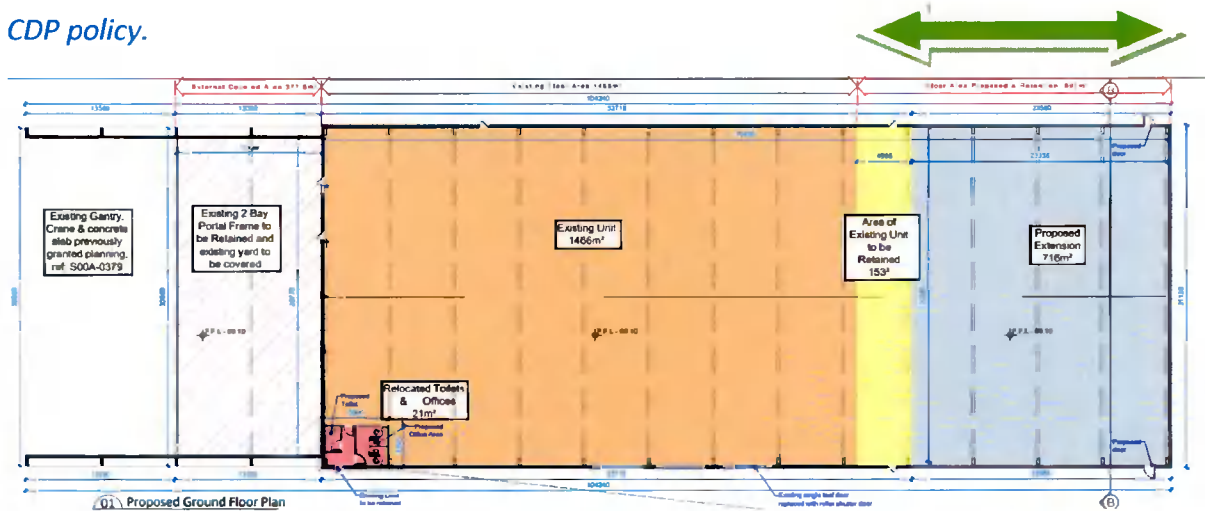
4. Section 11.2.1 Design Statements of the CDP requires developments over 1,000sq.m to be accompanied by a Design Statement consisting of a site analysis, a concept plan and/or masterplan, a statement based on the design criteria listed in Section 11.2.0 and/or tables 11.17 and 11.18 and a statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets. The proposal is split into a number of elements. The applicant states on their application form that the following floor area would be created:

- Proposed - 716sq.m

- Retention 530.5sq.m

The applicant is requested to clarify the level of floorspace created by the proposal. Should the total floorspace be greater than 1,000sq.m, then a design statement should be provided in accordance with

CDP policy.



Please note as follows that the total area of floorspace being retained & extended is 869m² as follows :

Area of existing building to be retained 153 m² (yellow)

Proposed extension 716 m² (blue)

The total level of floorspace in the proposal 869 m². See above

- The 2bay portal area being retained is covered only and no floorspace is provided.
- Note that as the additional floorspace proposed in this application is less than 1000m² then a Design Statement is not required.



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Item 5

5. The applicant is requested to provide the following details in relation to the concrete resurfaced area:

- details of the current area and whether or not it is currently a concrete yard;*
- details of existing and proposed levels, including cross sectional drawings clearly identifying the existing and proposed levels and the development (proposed and to be retained) within context;*
- details of any tanks, including size and use.*

Please find enclosed a topographical survey which details the existing yard.

- **21-037-P-010 Site Survey**

Details can also be found in the DRA report as follows.

- **DRA 21194- Drainage Design Report**

The existing arrangement consists of the following:-

- **Proposed Yard Area**
This area is currently a stoned area, with a small section of green hedging. Surface water drains by percolating through this stone.
- **New Extension Area**
¾ of this area is currently a concrete slab, surface water drains via gullies to the existing surface water drainage network.
The remaining ¼ area is currently a stoned area, surface water drains by percolating through this stone.

All Levels are indicated on the below drawing

- **DRA 21194-150 Proposed Drainage Layout Rev 3**

There are no proposed tanks on site.



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Item 6

6. The proposed development of a significantly large site, with sizeable structures and substantial roof coverage, resurfacing and hard engineering solutions to manage surface water drainage, all in close proximity to open space and at a location with minimal green infrastructure, where no green infrastructural elements are proposed, the applicant is requested to submit:

(1) Increased measures to mitigate the immense impact of the proposed development on the area and the environment such as green walls, green roofs, planted swales amongst other Green Infrastructure items.

See enclosed mitigation measures such as proposed Swail, permeable paving and the applicants commitment to landscaping for pollination and all within an existing commercial / industrial yard setting. Full details in enclosed documentation and reports.

(2) Proposals to augment linkages between the open space and new ecological areas proposed within the site (open attenuation areas and other planted areas), as well as augmenting links through the site to connect to other ecological corridors. These items would help to strengthen the viability of green pathways through the county and creating wider ecological corridors and linkages; would contribute to a healthier environment for workers on the site as well as deliver climate actions leading to Climate Adaptation and thereby meeting national guidance and targets. To lessen the impact of this disturbance the applicant is requested to submit mitigating proposals within an ecological report and landscaping plan. Proposals and mitigating solutions should include the greening of all infrastructural elements of the design.

There are limitations to the commercial and storage use of the existing site which for Health & Safety and logistical reasons prevent green links and or corridors within the site. However the proposed Swail along the boundary is a significant step towards a sustainable and ecological integration of the site and its surroundings.

- All details of SUDS measures have been included in DRA report. Please see below excerpt from report & **DRA 21194- Drainage Design Report**



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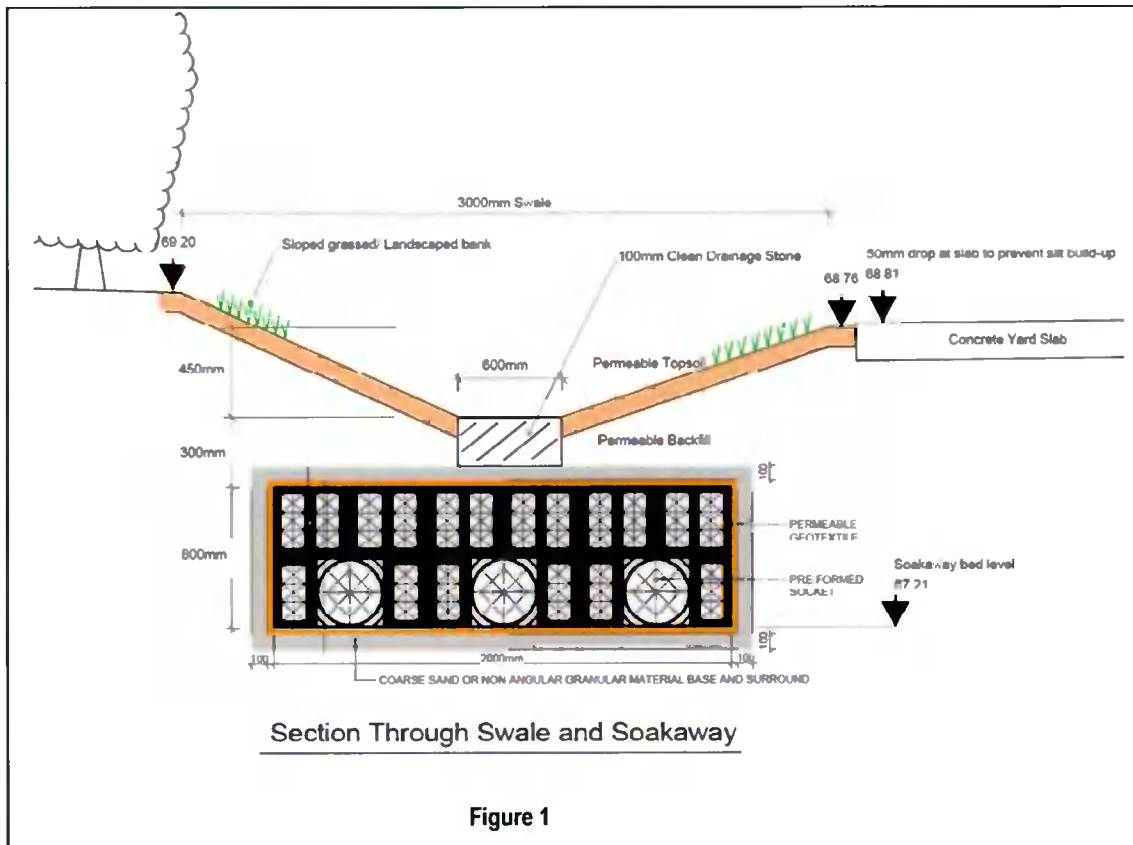
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Detail of proposed Swail

3.1 SUDS Measures

South Dublin County Council in their RFI indicated a preference for SUDS drainage solutions which do not involve the provision of underground attenuation storage unless alternative approaches are unfeasible.

Taking this into account we have revised the originally proposed drainage design and now propose the following SuDS measures:

- Provision of 3m wide Swale with a Soakaway along the southern boundary of the site. The developer is involved in the All Ireland Pollinator Plan which encourages the provision of green and planted areas for bees. This swale can be planted with suitable native grasses in line with this Plan.
- The new concrete yard slab is to connect to the proposed Swale.
- The new extension roof is a pitched roof to match the existing roof, because of this a Green Roof drainage solution is not suitable. We propose to connect the roof drainage to the Swale.
- The footpath at the side of the building is proposed as Permeable Paving.

Excerpt from DRA report



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Item 7.

7. (a) The surface water attenuation of 119m³ for 1 in 100 year storm event is undersized by approximately 360% and for 1:30 year storm undersized by 340%. The applicant is requested to submit a report to show surface water attenuation calculations that include the site area, area of different surface types in m² such as buildings, roads, pathways, permeable paving green grass and their respective run off coefficients. Include the SAAR value and site specific rainfall levels. The applicant should contact water services prior to submitting report to discuss surface water attenuation calculations.

(b) The applicant has not proposed any SuDS (Sustainable Drainage Systems) features for the proposed development. The applicant is requested to submit a drawing in plan and cross sectional views clearly showing proposed Sustainable Drainage Systems (SuDS) features for the development. Examples of SuDS to consider include, green roofs, permeable paving tree pits and other such SuDS.

(c) 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.

Please see details to address the above point in DRA report and drawings with excerpt below.

The Further Information Request recommends the use of surface water SUDS measures which avoid the use of underground attenuation storage unless alternative approaches are unfeasible.

Taking this into account the drainage has been revised, we now propose the following SUDS measures:

- Provision of 3m wide Swale with a Soakaway along the southern boundary of the site. The developer is involved in the All Ireland Pollinator Plan which encourages the provision of green and planted areas for bees. This swale can be planted with suitable native grasses in line with this Plan.
- The new concrete yard slab is to connect to the proposed Swale.
- The new extension roof is a pitched roof to match the existing roof, because of this a Green Roof drainage solution is not suitable. We propose to connect the roof drainage to the Swale.
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Surface Water from the existing concrete slab is directed away from the development by the provision of a short section of sloping slab (or ramp) around the perimeter of the proposed concrete slab.

This ramp prevents surface water from the existing slab from entering the development area and directs this surface water into the existing drainage network.

Two gullies are proposed on the existing network to prevent water ponding at the existing slab low points next to the proposed slab.

- **DRA 21194-150 Proposed Drainage Layout Rev 3**
- **DRA 21194- Drainage Design Report**

3.2 Stormwater Drainage Design

The surface water drainage has been designed in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GSDSDS).

Drawing no. 21194-150 Rev3 (Proposed Drainage Layout) shows the proposed surface water layout and SuDS measures, this is contained in Appendix A.

The areas draining to the Swale and Soakaway are:

- Extension Roof 734.8m²
- Concrete Yard Slab 3387.2m²
- Total Impermeable Area 4122m² – these areas (roof & slab) have been given a runoff coefficient of 1.

The area draining to permeable paving is:

- Footpath 48m²

The area currently draining via soakage into the ground is 3570m². (Yard area + ¼ Extension footprint)

The area currently draining into the existing drainage network is 599m² (¾ Extension footprint + footpath)

The proposed arrangement represents a reduction in area draining to the exiting surface water network.

The design of the Soakaway and associated storage is contained in Appendix C.

The design soakaway storage volume has been increased by 20% to take into account climate change.

The soakage rate used in the Soakaway design is based on a site soakage test carried out. The soakage test report is contained in Appendix D.

The rainfall data used in the design is based on site specific rainfall data issued By Met Eireann, a copy of this data is contained in Appendix E.

Excerpt from DRA report



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Item 8.

The applicant is requested to demonstrate how the potential to use renewable energy has been addressed in the proposal.

As the proposal is for an extension to an existing shot blasting steel storage shed where floor space only is being provided the proposed upgraded shot blasting machine will have a more efficient energy consumption to the older model being upgraded. There will be no increase in energy consumption as a result of this.

The applicant is also considering the upgrade of an existing roof on the main Heaton Steel building on site, and as part of this, is looking at the potential implementation of solar electric panels on same.

Conclusion:

Points 1-8 of the RFI request have been addressed with the enclosed documentation. It has been demonstrated that the applicant's proposal has taken the ecological & surface water concerns of SDCC on board and implemented measures into the existing commercial site to both enhance the ecology and mitigate surface water impacts.

Regarding the use of the proposed shed for extension, there is no change and the proposed extension, in allowing for additional indoor storage of steel and enhanced shot blasting facilities, requires no additional staff with only a very minor impact on HGV traffic to site.

Please confirm receipt of this information at your earliest convenience.

Paul Dolan MRAI

Director

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