

Land Use, Economic and Transport Planning Department,
County Hall,
Town Centre
Tallaght,
Dublin 24.

Dated: 31st^h January 2022

Reference: Response to Further Information Request – SD21A/0171

Dear Sir/Madam,

Please find a response to additional information Request SD21A/0171 received from South Dublin County Council (SDCC) on the 21st of October 2021.

This document has been prepared by Rowan Engineering Consultants Ltd. (Rowan) on behalf of Coffey Construction Ltd. It provides responses to each of the items requested in the FIR issued by SDCC. For the reader's convenience, the SDCC text for each of the Further Information items has been included ahead of each response in *italics* with Rowans Response in dark blue colour font.

Response to Request for Further Information

1. Request for Further Information Item 1

It is considered that an Article 27 process may be appropriate for establishing the nature of the material being transported. The Planning Authority may therefore grant permission at this stage to support that process. However, a number of issues which could reasonably have been expected to form part of an Environmental Impact Assessment Report, should be clarified prior to a grant of permission.

The applicant is therefore requested to address and provide for the following:

- a) *Regarding the levels, slope and reprofiling of the land, a Geotechnical Engineers Report confirming the stability of the proposed slopes on the site.*

The proposed volume and thickness of infill material has been greatly reduced from 91,000m³ and 3.5m in thickness in the original application to 25,000m³ and 1.5m in thickness (maximum) in the revised application to reduce potential impacts on the environment. As the proposed thickness has been reduced this has reduced the risk of instability. Nevertheless, a geotechnical stability report has been completed and is presented within **Appendix A**.

It concluded:

Forensic & Environmental Engineering

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- Fill profiles as per drawing J1387-PH-003 rev 02 are stable.
- Long term surcharge loading to top of fill areas not to exceed 10 kPa globally.
- There is no risk to sliding during heavy rain.

b) *details of any silt trapping proposed prior to completion and grassing of the lands;*

The proposed infill area is on the western side of the field with the nearest point of infill ~~80m~~ distance from the Camac River.

A silt fence will be erected around the perimeter of the field to ensure silt trap prior to run off to roads and or rivers. Infill material will also be spread in 150mm layers and each layer compacted with a 10 tonne roller prior to addition of another layer.

c) *a Method Statement and Schedule of Works detailing the treatment of top soil and subsoil on the site, in particular: the stripping, removal and storage of top soil from the source site; any temporary removal and storage of top soil on the subject site; any other preliminary works on the subject site; phasing of works; ripping; removal, spreading and grading of subsoil; spreading of imported topsoil and/or respreading of existing topsoil; seeding and cultivation in phases or at the end of the project.*

A method statement has been provided and attached as **Appendix B**.

d) *The applicant is requested to demonstrate how catastrophic mud flow and land slide can be prevented following periods of exceptionally heavy rain.*

The attached Geotechnical Stability report concluded:

- Fill profiles as per drawing J1387-PH-003 rev 02 are stable.
- Long term surcharge loading to top of fill areas not to exceed 10 kPa globally.
- There is no risk to sliding during heavy rain.

The attached Flood Risk Assessment Report concluded:

*74M E-G.

These findings along with a minimum distance of ~~80m~~ from the River Camac and silt control measures mentioned above indicate catastrophic mud flow and land slide following periods of exceptionally heavy rain is not a risk.

2. Request for Further Information Item 2

Having regard to the nature of the proposal and the RU zoning objective of the application site, which seeks to 'protect and improve rural amenity and to provide for the development of agriculture', the applicant is requested to submit the following information:

a) *Clarification on whether stone is also proposed to be deposited at the site as well as soil as there is reference within some of the supporting documents to stone but not within the description of development. This should include the quantity of stone proposed to be deposited.*

The material is referred to soil and stone in line with the definitions in the EPA (2019) *Guidance on Soil and Stone By-Products* (Article 27). The material is predominately soils and some naturally occurring stones maybe present. Logs of boreholes and testpits completed in the source site have been included in **Appendix C**. The depth of excavation on the source site ranges from 1.2 metres below existing ground level

*Correction made to typo and initialled.

(mbgl) to 3 mbgl and material at this depth is predominately described as *brown slightly sandy slightly gravelly CLAYs*.

- b) *What impact the proposal would have on the sites ability to support agriculture in the future and further justification for the proposal given the RU zoning objective.*

The objective of moving soils into the site is to increase the sites agricultural uses. Increasing soil thickness would improve the lands capacity for agricultural use.

- c) *Details of advice that the applicant has received from statutory bodies associated with agriculture on the suitability of the proposal to support agriculture following the proposed deposit of materials.*

Rowan has not received advice from statutory bodies associated with agriculture on the suitability of the proposal to support agriculture following the proposed deposit of materials.

3. Request for Further Information Item 3

The Roads Department has raised concerns with the proposal from a traffic and transport perspective. Given the quantity of material proposed to be used and site context the applicant is requested to submit the following:

1. *A Traffic Assessment report on the traffic generated from the proposed and current development on all local road networks which facilitate vehicular traffic associated with the proposed and current permitted development and background traffic at these locations.*

A Construction Stage Traffic Management Plan completed for the water reservoir construction site (source site, granted planning ref:SD18A/0180) has been updated to include the route to and from the source site to the infill site which is approximately 300m in distance. It is attached in **Appendix D**.

The volume of material proposed to be infilled is 24,000m³ which equates to approximately 2,800 truck movements with 8.5m³. The material would be hoped to be moved over a one month period which would equate to approximately 110 truck movements per day from 8:00 to 17:00. While it is noted that this is quite a few truck movements per day the extremely short distance of 300m and short temporary time period over which is active would result in low overall impact to the surrounding area. Traffic management controls, signage and wheelwash facilities as detailed within the Construction Stage Traffic Management Plan would also ensure the safety of other road users.

The alternative of sending material to another offsite facility would inevitable be further away and likely result in truck movements through Saggart town which have greater impacts to surrounding road users.

The beneficial reuse of material at a nearby site would also reduce transport CO2 emissions and is in line with South Dublin County Council Development 2016 - 2022 Plan objectives:

IE5 Objective 3: To encourage the transition from a waste management economy to a green circular economy to enhance employment and increase the value recovery and recirculation of resources.

'Dublin County Council signed up to the EU Covenant of Mayors in June 2012. The Covenant of Mayors is an initiative of the European Commission that brings

together Mayors from across Europe, in a shared voluntary commitment to reducing CO2 emissions by a minimum of 20% by 2020.'

The beneficial reuse of material and reduction in CO₂ emissions also strongly aligns with SDCC Climate Change Action Plan 2019 – 2024 which outlines one of its main targets to reduce greenhouse gas emissions by 40%.

2. A Construction Traffic Management Plan

A Construction Traffic Assessment Report completed for the water reservoir construction site (source site, granted planning ref:SD18A/0180) has been updated to include the route to and from the source site to the infill site. It is attached in **Appendix D**.

3. Construction & Demolition Waste Management.

A Construction & Demolition Waste Management Report was completed for the water reservoir construction site (source site, granted planning ref:SD18A/0180) which is attached in **Appendix E**. This covers all potential waste construction and demolition waste associated with this proposed project.

4. Request for Further Information Item 4

Water Services has raised concerns in relation to surface water and flooding. Given the quantity of material proposed to be deposited, the proximity of a water source and presence of flood zones the applicant is requested to submit the following:

Surface Water

- 1. Water Services have concerns that the proposed development will result in an increased surface water run off rate from the site which would exacerbate flooding issues downstream. The applicant is required to submit a report which demonstrates that surface water run off rates will not be increased from the site.*

A Flood Risk Assessment Report has been completed and is attached in **Appendix F**. The FRA concluded the project will not be at risk from flooding nor will it block flood flow paths or exacerbate flooding in the immediate vicinity or wider area as no infilling within a 'Flood Zone A' or 'Flood Zone B' will occur.

- 2. The applicant is required to clarify what water pollution and silt pollution mitigation measures are implemented as part of the development with respect to the Camac River to the east and north east of the site. Silt fencing shall also be included as part of these silt prevention measures*

A Construction Environmental Management Plan has been prepared and is attached in **Appendix G** which outlines water pollution and silt [pollution prevention control measures. Silt fencing is proposed around the perimeter of the field as shown on Drawing J1387-PH-001 Rev 04 and the closest point of infill of material is 74m from the River Camac.

- 3. The applicant is required to clarify what the long-term proposals are for the development. How long will the fill remain in the proposed location, and will the site be reseeded with grass or reinstated in any way to its natural state?*

The fill will remain permanently and will be reseeded with grass and continue to be used for agricultural purposes.

Flooding

1. *The proposed development site is located within Flood Zone A according to OPW's (Office of Public Works) CFRAM maps and South Dublin County Council's Strategic Flood Risk Assessment 2016-2022. The applicant is required to submit a site-specific flood risk assessment report with the inclusion of a justification test in compliance with OPW Flood Risk Management Guidelines for Planning Authorities. The report shall demonstrate how flood risk will not be exacerbated on the site as well as upstream and downstream of the development. Details of the measures and design features to prevent/mitigate the risk of flooding to the proposed development and to adjoining lands shall be submitted.*
2. *Submit a map showing the location of the site and proposed infill works in relation to the OPW CFRAM flood risk zones.*

A site-specific Flood Risk Assessment has been completed and is attached in **Appendix F**. The FRA concluded the project will not be at risk from flooding nor will it block flood flow paths or exacerbate flooding in the immediate vicinity or wider area as no infilling within a 'Flood Zone A' or 'Flood Zone B' will occur.

3. *The applicant is required to submit a drawing showing the distance between the proposed development and the top of the bank of the watercourse to the east of the site. The minimum setback distance from any works to the top of the bank of the watercourse shall be 10 metres. The existing 10m Riparian strip shall remain in its current state.*

Drawing J1387-PH-001 Rev 04 has been updated to show the minimum distance between the closest point of infill in the north eastern corner of the field and the River Camac, it measures 73.8m. Silt fencing will also be present along the perimeter of the field.

5. Request for Further Information Item 5

There are concerns about the potential visual impact on the proposal and the lack of information submitted. Given the quantity of material proposed to be deposited, the additional height, the site context and requirements of policy HCL7 of the CDP the applicant is requested to submit the following:

- a) *A Landscape and Visual Impact Assessment, that should have regard to the site and surrounding area, any protected views and the requirements of policy HCL7 of the CDP.*

A Landscape and Visual Impact Assessment Report has been completed and is presented in **Appendix H** along with a photomontage completed.

The Landscape Visual Impact Assessment concluded that based on the landscape and visual impact judgements, the proposed infill development in the townland of Slade, County Dublin, was not considered to give rise to any significant landscape or visual impacts

- b) *More detailed sections taken from a variety of positions showing the proposal in the context of the site and surrounding area.*

A Landscape and Visual Impact Assessment Report has been completed and is presented in **Appendix H** along with a photomontage completed.

The Landscape Visual Impact Assessment concluded that based on the landscape and visual impact judgements, the proposed infill development in the townland of Slade, County Dublin, was not considered to give rise to any significant landscape or visual impacts

6. Request for Further Information Item 6

There are concerns with the lack of information submitted regarding landscaping. The applicant is requested to submit a detailed proposed and existing landscaping plan to include any planting that is proposed to act as screening.

A Landscape and Visual Impact Assessment Report has been completed and is presented in **Appendix H**. The report concluded:

Based on the landscape and visual impact judgements provided throughout this LVIA, the proposed infill development in the townland of Saggart, County Dublin, is not considered to give rise to any significant landscape or visual impacts.

On this basis, it is not believed necessary to plant additional hedges or include screen planting measures to 'hide' the infill. The infilled areas will be levelled, and suitable reseed mix will be sown which will be beneficial for agricultural purposes.

7. Request for Further Information Item 7

There are concerns with the lack of information submitted in relation to ecology given the greenfield nature of the site and the presence of the Camac River, both of which can support existing flora and fauna. Having regard to the site context and the requirements of policy HCL15 of the CDP, the applicant is requested to submit a full Ecological Impact Assessment of the site and surrounding area, to include any mitigation measures. The report should be prepared by a suitably qualified individual.

An Ecological Impact Assessment Report has been completed and is attached in **Appendix I**.

With the recommended mitigation measures, it can be concluded that the proposed development at Slade will have a residual neutral impact upon the biodiversity of the local area.

8. Request for Further Information Item 8

Given the quantity of material proposed to be deposited at the site and the site context, the applicant is requested to submit a Construction Environmental Management Plan.

A Construction Environmental Management Plan has been completed for the site and is attached in **Appendix G**.

9. Request for Further Information Item 9

Given the quantity of material proposed to be transported to the site and the proximity of neighbouring residential properties, there are concerns about the potential impact of dust escape from the site to the surrounding area. As no detail has been provided by the applicant as to how dust escape would be managed on site, the applicant is requested to submit a Site Management Plan that includes measures to control dust and mitigation measures.

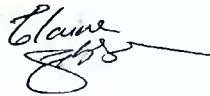
The Construction Environmental Management Plan prepared for the proposed infill works details proposed dust monitoring procedure. These can be summarised as daily visual

inspections at 5 locations around the site perimeter and dust monitoring using Bergerhoff dust deposition gauges.

An Appendices and Drawing Register are provided at the bottom of this letter.

Should you have any queries please don't hesitate to contact, me.

Best Regards,

A handwritten signature in black ink, appearing to read 'Elaine Gibson', with a stylized flourish at the end.

Elaine Gibson
Environment Manager
Rowan Engineering Consultants Ltd.

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Drawings Register

No.	Drawing Description		Drawing Number	Drawing Detail		Sheet and Scale	Size
1	Updated Layout Plan	Field	J1387-PH-001	Updated Layout Plan	Field	1:500 @ A0	

Environmental & Planning Report Appendices Register

Appendix Number	Description
Appendix A	Geotechnical Slope Stability Report
Appendix B	Risk Assessment Method Statement
Appendix C	Source Site Investigation Logs
Appendix D	Updated Construction Traffic Management Plan
Appendix E	Construction and Demolition Waste Management Plan
Appendix F	Flood Risk Assessment
Appendix G	Construction Environmental Management Plan
Appendix H	Landscape Visual Impact Assessment
Appendix I	Ecological Impact Assessment Report