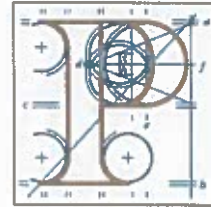


Our Case Number: ABP-312571-22



An
Bord
Pleanála



South Dublin County Council
Planning Department
County Hall
Tallaght
Dublin 24

Date: 03 March 2022

Re: Demolition of existing single storey shed, ESB substation and oil tank, construction of 130 no. apartments, change of use of existing Blocks A, B and C at Dolcain House and associated site works.

Dolcain House, Monastery Road, Clondalkin, Dublin 22. (www.dolcainhouseshd.ie)

Dear Sir / Madam,

Enclosed for your information are two copies of submission(s) received by An Bord Pleanála in relation to the above-mentioned proposed strategic housing development.

Please ensure that a copy of this/each submission is available for public inspection at the offices of the planning authority.

If you have any queries in relation to this matter, please contact the undersigned officer. Our email address is strategichousing@pleanala.ie. Please mark in block capitals "STRATEGIC HOUSING UNIT" and quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with An Bord Pleanála.

Yours faithfully,

Helen Keane
Executive Officer
Direct Line: 01-8737294

SHA28

| | | |
|--------------------|---------|--|
| Tel | Tel | (01) 858 8100 |
| Glaó Áitiúil | LoCall | 1890 275 175 |
| Facs | Fax | (01) 872 2684 |
| Láithreán Gréasáin | Website | www.pleanala.ie |
| Ríomhphost | Email | bord@pleanala.ie |

| | |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1 | Dublin 1 |
| D01 V902 | D01 V902 |

| Name | Modified |
|--|------------------|
| 312571 Sub - Department of Housing , Local Government & Heritage.pdf | 24/02/2022 18:01 |
| 312571 Sub - IW.pdf | 23/02/2022 14:33 |
| 312571 Sub - SIAC Bituminous Products Ltd (SLR).pdf | 24/02/2022 14:47 |
| 312571 Sub - TII.pdf | 09/02/2022 14:35 |



An Bord Pleanála
64 Marlborough St.
Dublin 1
D01V902

Dáta | Date
08-Feb-2022

Re: Planning Ref.: 31257122
Applicant: STRATEGIC HOUSING DEVELOPMENT Randelswood Holdings Ltd.

Dear Sir/Madam,

In the case of the above planning application, the Authority will rely on your planning authority to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to the following:

- The proposed development shall be undertaken strictly in accordance with the recommendations of the Transport (Traffic Impact) Assessment. Any recommendations arising should be incorporated as Conditions on the Permission, if granted. The developer should be advised that any additional works required as a result of the Assessment should be funded by the developer.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

Yours faithfully,

on behalf of
Land Use Planning Unit

**Note: In accordance with the provisions of section 13 of the Roads Act 2015, Transport Infrastructure Ireland (TII) is the operational name of the National Roads Authority with effect from 1 August 2015.*

Due to continued restrictions associated with COVID-19 all planning application referral documentation, including applications, submission acknowledgments, further information notifications and decisions should be notified electronically to TII at landuseplanning@tii.ie. TII would appreciate your Authority's assistance on this matter.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.



Bonneagar Iompair Éireann
Ionad Gnó Ghasta na Páirce
Sráid Ghasta na Páirce
Baile Átha Cliath 8
Éire, D08 DK10



Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
Ireland, D08 DK10



info@tii.ie



www.tii.ie



+353 (0)1 646 3600



+353 (0)1 646 3601



An Bord Pleanála
64 Marlborough St.
Dublín 1
D01V902

Dáta | Date
08-Feb-2022

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info@tii.ie

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**An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage**



Planning Ref: ABP-312571-22
(Please quote in all related correspondence)

24th February '22

**The Strategic Housing Unit
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902**

Via email: strategichousing@pleanala.ie

Re: Notification under the Planning and Development (Housing) and Residential Tenancies Act 2016; Planning and Development (Strategic Housing Development) Regulations 2017

Proposed Development: SHD application consisting of 130 apartments at Dolcain House, Monastery Road, Clondalkin, Dublin 22.

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology

With regard to the above proposed development the Department has reviewed the archaeological assessment report that was submitted with the application. The archaeological assessment was carried out by Archer Heritage, dated 2nd November 2021, and included archaeological desk based assessment. The assessment recommends that the proposed development be subject to further archaeological assessment. The Department concurs with the recommendations in the report.

It is noted that given the extent and location of the proposed development it could impact on subsurface archaeological remains. In line with national policy, see Section 3.7 of Framework and Principles for the Protection of the Archaeological 1999, the Department recommends that the following archaeological conditions be included in any grant of planning permission that may issue.

**Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90**

**An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage**



Planning Ref: ABP-312571-22
(Please quote in all related correspondence)

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Newtown Road, Wexford, County Wexford, Y35 AP90**



Your Ref: ABP-312571-21
Our Ref: CDS21001936

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

23rd February 2022

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Sir/ Madam,

Re: Strategic Housing Development – Demolition of existing single storey shed, ESB substation and oil tank, construction of 130 no. apartments, change of use of existing Blocks A, B and C at Dolcain House and associated site works. Dolcain House, Monastery Road, Clondalkin, Dublin 22

Irish Water has reviewed the plans and particulars submitted for this Strategic Housing Development Application and based on the details provided by the applicant to Irish Water as part of their Pre-Connection Enquiry, and on the capacity available in our networks, Irish Water has the following observations.

In respect of Water:

In order to accommodate the proposed connection at the Premises approx. 130m of a new 150mm ID pipe main is required in Monastery Road to connect the Development to the existing 8"uPVC main in Woodford Hill.

Irish Water currently does not have any plans to extend its network in this area. The applicant will be required to fund this network extension, it is expected these works will be within the public domain.

In respect of Wastewater:

Proposed connection is feasible without infrastructure upgrade by Irish Water or the applicant.

Design Acceptance:

The applicant (including any designers/contractors or other related parties appointed by the applicant) is responsible for design and layout validation for water and/or wastewater infrastructure within their site redline boundary. Please note, the applicant has not been issued with a Statement of Design Acceptance for the proposed development.

Planning Recommendations:

Irish Water respectfully requests the board condition(s) any grant as follows;



Your Ref: ABP-312571-21
Our Ref: CDS21001936

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

23rd February 2022

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
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www.water.ie

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Planning Recommendations:

Irish Water respectfully requests the board condition(s) any grant as follows;

24 February 2022

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Our Ref. 501.00541.00005
Your Ref. TA06S.312571

Dear Sir / Madam,

RE: SIAC BITUMINOUS PRODUCTS LTD., MONASTERY ROAD, CLONDALKIN, DUBLIN 22

SUBMISSION IN RESPECT OF STRATEGIC HOUSING DEVELOPMENT APPLICATION BY RANDALSWOOD HOLDINGS LTD. FOR DEVELOPMENT AT ADJOINING SITE AT DOLCAIN HOUSE, MONASTERY ROAD, CLONDALKIN, COMPRISING CHANGE OF USE OF EXISTING OFFICE BLOCKS A, B, AND C TO RESIDENTIAL USE, RANGING IN HEIGHT FROM 4-5 STOREYS OVER PODIUM / BASEMENT, TOGETHER WITH MODIFICATIONS AND EXTENSIONS TO BLOCKS, AND CONSTRUCTION OF NEW BLOCK D, ALL TO ACCOMMODATE 130 APARTMENTS.

We write on behalf of our Client, SIAC Bituminous Products Ltd. (hereinafter 'SIAC BP'), to make a formal submission to An Bord Pleanála (hereinafter 'the Board') in respect of an application for Strategic Housing Development (SHD) by Randalswood Holdings Ltd. (Planning Ref. TA06S.312571) for redevelopment of the existing office block known as 'Dolcain House', located immediately north-west of the asphalt production facility operated by our Client at Monastery Road, Clondalkin.

The proposed development essentially provides for a residential development of 130 No. apartments, involving a change of use of 3 No. existing blocks, identified as Blocks A, B and C, from current use as offices to residential use, together with the construction of 1 No. additional (new) residential block, identified as Block D. Alterations to the existing blocks are also proposed including the addition of an extra floor level to each.

Although SIAC BP recognises that the proposed re-development is consistent with the current land-use / development zoning for the application site, it is concerned about the potential implications that this development, were it to proceed, might have on the continued operation of its existing asphalt plant in the future.

BACKGROUND

The asphalt production plant operated by SIAC BP at Monastery Road is strategically located close to the junction between the M50 Motorway and the N7 National Primary Road at Red Cow (Junction 9), just 6km from Dublin City centre, thereby enabling the company to supply asphalt effectively and efficiently to construction and development sites across much of the Greater Dublin Area.

There has been an asphalt plant at the SIAC BP site, a former quarry, from a date prior to the enactment of the first Planning and Development Act in 1964. The existing plant is a state-of-the art computerised facility which dates from 2001 and was essentially a like for like replacement of the former plant. As such, it was deemed to be exempted development and did not require any planning permission at that time.

At the present time, there are no planning or environmental controls on asphalt production activities at Monastery Road and the company has historically been able to operate on a 24-hour, round-the-

- (i) there are no restrictions on night-time working;
- (ii) there are no restrictions on asphalt output / production volumes, nor on the volume of constituent intake materials or the volume thereof which may be stored on site;
- (iii) there are no restrictions on the number or timing of related HGV traffic movements to and from Monastery Road;
- (iv) there are no restrictions on noise emissions or emissions to atmosphere;
- (v) there are continuous plant / excavator movements along a climbing ramp that runs immediately beyond the application site boundary to the south-east of Block C (bringing aggregate materials to a hopper and rising conveyor belt which feeds the storage bins);
- (vi) there are no restrictions in respect of on-site lighting arrangements; and
- (vii) the site and site activities are currently screened from the view of, and not overlooked by, any residential property.

While the existing office / commercial development at Dolcain House has been in place for many years, there has historically been little development conflict given the fact that the building is largely vacant outside of working hours and is has been occupied for much, if not all, of that time by a (former) sister company within the SIAC Group who also operates within the construction sector.

SIAC BP envisages that asphalt production activity will continue at its existing facility on Monastery Road for the foreseeable future. Although the company did previously explore the feasibility of relocating its business to other locations on the urban fringe of Dublin, it failed to identify any appropriately zoned site which could offer the same strategic advantages that it currently enjoys at its site at Monastery Road.

It should be further noted that the current (and draft) South Dublin County Development Plan (CDP) both consider a (new) concrete / asphalt plant development to be '*permitted in principle*' only under the specific 'RU', rural development land-use zoning designation, and then only if it is located in or adjacent to a quarry. Given the limited number of operational quarries within South Dublin County and the challenges associated with obtaining planning permission for new quarry development, SIAC BP does not foresee any opportunity to relocate its business to any alternative location and is committed to continuation of operations at Monastery Road for the foreseeable future.

The current (and draft) South Dublin CDPs both stipulate that a concrete or asphalt plant is '*not permitted*' under 'RES' residential zoning and that it is only '*permitted in principle*' adjacent to a quarry. SIAC BP considers that the logical follow-on from this is that it should not then be acceptable, from a land use planning perspective, to turn this entirely on its head and introduce new residential development adjacent to an existing asphalt plant.

SIAC BP's obvious concern is that establishing high density residential development in much closer proximity to its asphalt production plant than heretofore will give rise to an increased number of nuisance / environmental complaints about emissions from its facility in the future, notwithstanding the fact that an asphalt plant has been extant at this location for many decades, without any significant adverse nuisance / environmental impact on the adjoining office block or on the local community.

In highlighting potential development conflict issues, SIAC BP wishes to put on record that it is not seeking to prevent, delay or frustrate the proposed re-development of Dolcain House. Its sole concern is that any whatever future re-development does take place

- (i) fully recognises and addresses potential land-use conflicts with adjoining site / production activities and the potential implications for its amenity value; and
- (ii) incorporates any (and all) design measures which the project promoter, its designers and agents, as well as South Dublin County Council and the Board, consider appropriate and necessary to eliminate or avoid potential future development conflict.

It is noted that the noise assessment states in Section 2.1.1 that *'the existing ambient noisescape is dominated by the presence of SIAC Quarry operations with the hum of machinery / plant, general vehicle movements with reversing sirens, personnel on site, a speaker system'*.

The following observations are also made in respect of the noise monitoring report based on a cursory review;

- (i) recorded noise levels are averaged over extended 8-hour or 16-hour monitoring periods . There is no analysis or consideration given to averaged noise levels averaged over shorter (e.g. 15-minute) monitoring periods, nor is there any evaluation of peak or maximum noise levels;
- (ii) the noise levels associated with activities at the SIAC BP site are likely to be partially attenuated by the intervening vegetation / coniferous trees (on third party lands) and were these not present, recorded noise levels would likely be higher;
- (iii) the text of Paras 2 and 4 of Section 4.2 indicate that the reported noise levels at NML2 do not include that associated with generators at Round Towers GAA club on the evenings of 08/01/20 and 09/01/20. The report notes (also in Section 4.2) that the generators raise recorded noise levels by up to 6 dB(A). These generators could also have a tonal / impulsive component which would then not be accounted for in the noise analysis;
- (iv) there was no production at the SIAC BP facility on the evening of 08/01/20 or 09/01/20, but if there was, the actual recorded (uncorrected) ambient noise levels would likely have been higher again;
- (v) it is noted that there appears to be 1 hour and 23 minutes of elevated noise recordings excluded from the baseline analysis undertaken at NML3 over the period 09/11/21 to 11/11/21 which, if the reported data is to be taken at face value, would have the effect of reducing the reported L_{Aeq} from 56.1dB(A) to 55.3db(A). No explanation seems to be provided for the exclusion of this data. Of interest is that SIAC BP was operating on both those nights and elevated noise levels recorded at 2am on the morning of 10/11/21 have been excluded from the analysis;
- (vi) review of the baseline noise monitoring data at NML3 provided for the early morning of 10/11/21 and 11/10/21 indicates that over several 15-minute monitoring intervals, ambient averaged noise levels were in excess of the 50dB(A) L_{Aeq} night time desirable low sound level and that maximum noise levels were in excess of the 60dB(A) L_{Amax} WHO limit at the façade of living spaces which allows people to sleep with the window open (refer to Section 4.4 of report);
- (vii) just because no tonal or impulsive noise were recorded or reported at the time of the noise survey does not mean that there are not periodic activities at the adjoining SIAC BP site which could generate such noise and could potentially give rise to complaints from residents at the proposed development.

The Board is reminded that the SIAC BP asphalt plant has no restrictions on the number or timing of related HGV traffic movements to and from Monastery Road and that there are no restrictions on noise emissions associated with asphalt production activities. Were there, for example, to be a requirement to supply asphalt at night-time for a major road re-surfacing contract (e.g. on a national road), the resultant HGV traffic movements could result in significant noise disturbance to some residential units in Blocks C and D of the proposed development in particular.

It is unclear to what, if any extent, the noise assessment has informed the proposed layout of the residential scheme at Dolcain House. The take away for SIAC BP from the above is that, from a noise perspective, there is lots of justification for its unease about the compatibility of the proposed development with its existing operations and for its concern that this has not been adequately recognised or addressed in the development proposals.

Aside from all of the above, SIAC BP is also concerned that, in the past, it has also received occasional complaints from neighbours about odours arising from the asphalt production plant, principally of tarry / hydrocarbon / burning smells. The potential for such complaints is largely dependent on meteorological conditions (wind speed and direction). As for other emissions, SIAC BP is concerned that, depending on production activities, plant efficiency and meteorological conditions, the proposed development could give rise to increased frequency and intensity of complaints about odours. It is particularly concerned that potential odour impacts have not been identified or addressed in the development proposals submitted to the Board.

SIAC BP further notes that there is little, if any, assessment of the potential for coarse dust dispersion to arise around the proposed development and the fact that it is currently substantially mitigated by the intervening vegetation / coniferous trees on third party lands which, as noted previously, the developer appears to assume will remain in place indefinitely, or at least for as long as asphalt production activities continue at SIAC BP's site.

Pedestrian / Cyclist Movements

It is noted from the Statement of Consistency and Planning Report that the proposed re-development of Dolcain House facilitates pedestrian movements to and from the apartment blocks via the existing pedestrian access gate which fronts onto a pedestrian crossing on Monastery Road. It is not clear what assumptions have been made in respect of cyclist movements, about how they might access or egress the proposed development.

Although it can be expected that a significant proportion of future residents may walk between the proposed development and the LUAS stop at Red Cow. SIAC BP is concerned that, notwithstanding the designer's assumptions, some residents will elect to walk or cycle by Block D and enter / egress the site through the proposed vehicular access only gate and the junction with the link road between the Monastery Road roundabout and the SIAC BP facility. It is noted that there are no proposals for footpaths or cycle paths to segregate any pedestrians or cyclists who might elect to enter or exit the development by this route and that there are no design proposals to impede them doing so other than indicating that a gate is intended to provide access for vehicles only, as if the attribution of such limitation on use would be sufficient to ensure that all residents will indeed exit at the proposed pedestrian access.

SIAC BP is concerned that the potential arrival of pedestrian or cyclist traffic at the junction between the car park access road and the link road between the roundabout and its production facility could have potential traffic safety implications, particularly given the lack of any dedicated walking or cycling infrastructure, and increase the potential for conflict between pedestrians / cyclists and HGV's accessing and egressing its production facility. SIAC BP would like further reassurance that uncontrolled pedestrian or cyclist traffic at the existing access junction will be actively and effectively frustrated or prevented through further design measures.

Night-time Working / Junction Lighting

As noted previously, there are currently no planning restrictions on night-time working at the existing asphalt plant at Monastery Road and the plant is operating increasingly frequently at night, in part due to an increase in demand from Local Authorities for road surfacing works to be undertaken along busy urban streets at night when traffic movements are minimal.

While the impact of night-time production activity on existing residential development is largely mitigated or attenuated by the intervening / separation distance (in excess of 100m), this will be markedly reduced in respect of the proposed apartment scheme at Dolcain House. It can therefore be anticipated that nuisance complaints from future residents could arise in respect of night-time activities, emissions from the production plant and associated on-site activities, including movement



This submission is made online and accompanied by a €20 submission fee.

If you have any queries in relation to this submission, please contact the undersigned.

Yours faithfully,
SLR Consulting Ireland

A handwritten signature in black ink, appearing to read 'Derek Luby'. The signature is fluid and cursive.

Derek Luby
Technical Director