

Comhairle Chontae Atha Cliath Theas

PR/0505/22

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD22A/0065 **Application Date:** 23-Feb-2022

Submission Type: New Application **Registration Date:** 23-Feb-2022

Correspondence Name and Address: Thorton O'Connor 1, Kilmacud Road Upper,
Dundrum, Dublin 14

Proposed Development: Provision of a warehouse unit with ancillary office and staff facilities and associated development. The building will have a maximum height of 15.5m with a gross floor area of 13,604sq.m including a warehouse area (12,568sq.m), staff facilities (489sq.m) and ancillary office area (538sq.m). The development will also include a vehicular and pedestrian entrance to the site from Magna Avenue, a separate HGV entrance from Magna Drive; 69 ancillary car parking spaces; covered bicycle parking; HGV parking and yards; level access good doors; dock levellers; access gates; signage; hard and soft landscaping; lighting boundary treatments; ESB substation; sprinkler tank and pump house; an all associated site development works above and below ground.

Location: Magna Avenue and Magna Drive, Citywest, Dublin 24

Applicant Name: Rockface Development Limited

Application Type: Permission

(CM)

Description of site and surroundings

The site is an undeveloped greenfield site in Fortunestown located on Magna Drive. It is bound to the east by industrial development, to the west by a larger greenfield site upon which residential development has been granted under ABP-306602-20.

Site Area – Stated as 3.03 Ha.

Proposal

Provision of a **warehouse unit** with ancillary **office and staff facilities** and associated development. The building will have a maximum height of 15.5m with a gross floor area of 13,604sq.m including:

- a warehouse area (12,568sq.m),

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- staff facilities (489sq.m)
- and ancillary office area (538sq.m).

The development will also include:

- a vehicular and pedestrian entrance to the site from Magna Avenue, a separate HGV entrance from Magna Drive;
- 69 ancillary car parking spaces;
- covered bicycle parking;
- HGV parking and yardss;
- level access good doors;
- dock levellers;
- access gates;
- signage;
- hard and soft landscaping;
- lighting boundary treatments;
- ESB substation;
- sprinkler tank and pump house;
- and all associated site development works above and below ground.

Zoning

'EE' – "To provide for enterprise and employment related uses."

The site is located in close proximity to 'RES-N' zoning, immediately to the west.

SEA Monitoring

No overlaps indicated with the relevant layers.

Consultations Received

Environmental Services Department	No objection, subject to use of swales.
Roads	Requests Additional Information.
Public Realm	Requests Additional Information.

External

HSE Environmental Health Officer	No objection, subject to conditions.
Irish Water	No objection, subject to conditions.
Department of Defence	Requests Additional Information.

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Observations/Representations/Submissions

None Received.

Planning History

SD08A/0588 – Permission **granted** for A light industrial / storage warehouse unit with 3 storey ancillary offices plus a single storey stand alone ESB Sub-station, car parking and associated site development works.

SD08A/0588/EP – Extension of duration for above permission granted in 2013 for a period of five years. Permission has withered and was not implemented.

Adjoining Site

SHD3ABP-306602-20 – Permission granted by An Bord Pleanála despite a recommendation for refusal by South Dublin County Council, for strategic housing development as follows: Construction of a residential development of **463 dwellings comprising 353 apartments, 89 houses and 21 duplex apartments**, creche (c.587.8sq.m) and community building (c.141sq.m) as follows: (A) 353 apartments in 7 apartment buildings (with balconies or terraces [including communal terraces] as follows: Block 1 (6 storeys with a part 7 storey level) of 57 apartments; Block 2(6 storeys with a part 7 storey level) of 47 apartments; Block 3 (6 storeys over undercroft/semi-basement with a part 7 storey level) of 56 apartments with car parking and ancillary plant/storage at basement level; Block 4 (6 storeys over undercroft/semi-basement with a part 7 storey level) of 56 apartments with car parking and ancillary plant/storage at basement level; Block 5 (6 storeys with a part 7 storey level) of 47 apartments; Block 6 (6 storeys over undercroft/semi-basement with a part 7 storey level) of 58 apartments with car parking and ancillary plant/storage at basement level; Block 7 is 6 storeys of 32 apartments (creche at ground and first floor) with outdoor play area. (B) 89 houses; House types 1A, 2A, 4, 4A- 3 storey to front [2 storey to rear] remainder of house types 2 storey. (C) 21 duplex apartments in 2 3-storey buildings. (D) Single storey community building including management office, 3 single storey ESB substations, single storey bicycle and bin stores. (E) 401 car parking spaces (including 3 car sharing spaces) to serve overall development and 364 bicycle spaces ([for apartments] with apartment bicycle storage provided internally at ground floor level for apartment blocks 1-7). (F) Provision of public open space areas within the development (including playground areas and communal open space areas); all ancillary landscape works, public lighting, planting and boundary treatments including regrading/re-profiling of site where required as well as provision of footpaths and cycle paths. (G) Vehicular access to the proposed development will be from the Citywest Road (N82) and will include pedestrian crossings and works to facilitate access (including vehicular and footpath/bridges over stream/ditch), secondary vehicular and pedestrian access to boundary to lands to north (currently under construction) and pedestrian to boundary to Magna Drive. (H) Provision of surface water and underground attenuation and all ancillary site development work.

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Planning Enforcement

None.

Pre-Planning Consultation

None recorded or indicated on the application form.

Relevant Policy in the South Dublin County Development Plan 2016 – 2022

Chapter 4 Economic Development and Tourism

Policy ET1 Overarching

Policy ET3 Enterprise and Employment

Section 11.1.1 Land Uses

Section 11.1.1 (iv) Transitional Areas

Section 11.2.3 Environmental Hazard Management

Section 11.2.3 (ii) Noise

Section 11.4.1 Bicycle Parking Facilities

Section 11.4.2 Car Parking Standards

Section 11.8.2 Appropriate Assessment

Fortunestown Local Area Plan 2012

Relevant Government Policy

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

Regional, Spatial & Economic Strategy 2019 - 2031, Eastern & Midlands Regional Assembly, 2019.

Waste Management Plan for the Dublin Region 2005-2010, Dublin City Council, Dun Laoghaire-Rathdown County Council, Fingal County Council and South Dublin County Council, (2005).

The Planning System and Flood Risk Management Guidelines for Planning Authorities Department of the Environment, Heritage and Local Government and OPW (November 2009).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, 2009.

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Assessment

The main issues for assessment are:

- Accuracy of Notices
- Zoning and Council Policy
- Visual Impact and residential amenity
- Access, Transport and Parking
- Public Realm
- Drainage
- Aviation Safety
- Screening for Appropriate Assessment
- Screening for Environmental Impact Assessment

Accuracy of Notices

The planning notices identify the height of the structure as being 15.5m. Elevation drawings show the building to be as high as 16.5m in places. This should be reflected on **revised notices** by **additional information**, or else revised drawings provided showing that the development would be consistent with the original planning notices.

Zoning and Council Policy

Under the South Dublin County Development Plan 2016 - 2022, the site is subject to zoning objective 'EE' – 'To provide for enterprise and employment related uses.' 'Industrial-General' is permitted in principle in 'EE' zoned areas.

The site is in a transitional area, being located adjacent to 'RES-N' zoned lands ("To provide for new residential communities in accordance with approved area plans."). As per section 11.1.1 (iv) of the South Dublin County Development Plan 2016 – 2022,

“Abrupt transitions in scale and use should be avoided adjacent to the boundary of land use zones. Development proposals in transition areas should seek to avoid development that would be detrimental to the amenities of the contiguous zone. For example, regard should be had to the use, scale and density of development proposals in zones abutting residential or rural areas in order to protect residential or rural amenity, as appropriate.”

Fortunestown Local Area Plan

The southern portion of the site is within the Fortunestown Local Area Plan lands. The Plan identifies the south and west frontage of the site as a primary street with built frontage. This particular designation is also identified for the SHD site to the west, however this was disregarded by An Bord Pleanála in their decision under ABP-306602-20. Consequently, building frontage out onto one side of Magna Drive is highly unlikely to create a 'street' and applying this objective selectively to the subject site would not serve an urban design function.

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Visual Impact and Residential Amenity

The proposed warehouse would be 16.5m in size above ground, and presents a wide façade of 140m to the west (the most sensitive receptor, being a residential site with permission). This curtain wall façade will be treated with composite insulating cladding panels with various shades of grey and some spandrel windows. A green wall is also proposed. The south-west corner is tapered and a vertical feature window is provided at that location, beneath a signage area. Aside from a fire door at ground level, there is no activity on the western façade and it fronts directly onto landscaped surrounds. The entire building is to be screened behind a berm and planted trees.

In terms of height, the proposed development is not as tall as that permitted on the adjoining site, and so no undue transition is suggested to occur here.

Sunlight/Daylight Impact

The layout and design of the permitted development on the adjoining site is known. The proposed warehouse would appear to be separated by approx. 40 metres from permitted buildings opposite, and is located west, south-west and north-west of permitted units on the adjoining site. There are also some existing residential dwellings to the south, slightly uphill of the site. Given the mass and height of the proposed building, and given the precautionary policy advised under section 11.1.1 (iv) of the County Development Plan, sunlight/daylight impacts on the adjoining developments are a key concern on this site.

The applicant has provided a report entitled “Daylight, Sunlight and Overshadowing Assessment.” The report considers vertical sky component (VSC) and shadow plots to measure the potential impact on habitable rooms in adjoining developments. The report shows that there will be a negligible detrimental impact to daylight levels in the permitted development to the west and existing dwellings to the south. The findings in the report are accepted.

Access, Transport and Parking

The Roads Department has recommended 3 items of additional information. The report expresses satisfaction with the car parking ratio. The applicant is proposing the maximum parking rate possible for a ‘Zone 2’ development of this size (the Roads Report quotes the maximum figure for Zone 1, but this development is well connected to the 77A bus route and will be well connected to Fortunestown Luas once the adjoining development is delivered).

The three items of additional information are as follows:

1. The applicant shall submit a detail design of proposed vehicular and pedestrian accesses from Magna Avenue and Magna Drive, visibility splays shall be demonstrated at the proposed vehicular accesses.

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2. The applicant shall submit a swept path analysis for any emergency vehicle movements that would occur within the site.
3. The applicant is requested to submit a revised layout of not less than 1:200 scale showing 10% vehicular parking spaces (7no.) to be equipped with electrical charging points. 100% of spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points. REASON: In the interest of sustainable transport.

It is considered reasonable that these issues are the subject of a request for **additional information**.

The Roads Report also notes that the adjoining roads are not taken in charge and that the applicant should obtain the consent of adjoining parties to works on those roads. This should also be the subject of a **request for additional information**.

Public Realm

The applicant has provided a landscape rationale, landscape & visual impact assessment, and tree report & survey. The Public Realm Department report seeks **additional information** on 6 grounds. The report reads as follows:

In relation to the above proposed development, this section has reviewed the application and has the following comments:

Landscape Plan

In addition to the submitted landscape plans and landscape rationale the applicant is requested to submit soft landscape details to include detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation and spacings. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape. The landscape plan and associated planting plan should be prepared by a suitable qualified landscape architect.

Green Infrastructure

The applicant is requested to submit green infrastructure proposals to help mitigate and compensate for the impact of the proposed development on this green field site and the removal of a hedgerow. These proposals shall include additional landscape details, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population. Response shall include drawings.

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SuDS

A SuDS strategy should be developed for the proposed development which takes account of quantity, quality, and amenity issues. The design of SuDS features is required to be of high quality to achieve a multifunctional space for amenity, biodiversity and surface water management. The proposed SuDS features should aid the maintenance of the existing greenfield runoff rates or potentially reduce the amount of surface water entering the piped surface water system.

The current proposed drainage system needs to be developed further in order to sustainably manage surface water through a natural hydrological regime or SUDS scheme within the development. The philosophy of SUDS is an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and habitat/biodiversity enhancement. SuDS that should be considered for the SHD development include:

- Bio retention systems
- Infiltration systems
- Tree pits
- Channel rills
- Green area detention basins
- swales

Where possible in addition to the SUDS features proposed the applicant should provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.

Existing Trees

Existing, mature trees can be significant assets to new developments, they add a sense of place, maturity and beauty, provide valuable screening, shelter, privacy and support wildlife. Within built developments, retention of existing trees is often desirable and achievable, subject to arboricultural assessment, impacts and feasibility studies. However, trees can be lost because of the impacts of construction activities associated with new developments. It is essential to conserve existing trees where possible and suitable to do so. The Council recognises the importance of existing trees and requires that they be given adequate consideration at all stages of the development process, from feasibility stage to post completion management.

In addition to the submitted Tree Report and Survey, the applicant is requested to submit the following information in accordance BS 5837:

- i) Arboricultural Impact Assessment
- ii) Tree Constraints Plan
- iii) Tree Protection Plan
- iv) Arboricultural Method Statement (AMS)

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The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2016-2022 and with best practice guidelines and recommends the following additional information be provided:

1. The applicant is requested to submit comprehensive and detailed landscape proposals for the development, prepared by a qualified Landscape Architect. Such proposals should include a scaled landscape plan(s) with cross- sections, showing the layout and hard and soft treatment of all boundaries, features, external areas and green spaces. The proposals shall be accompanied by specifications for materials, workmanship and maintenance, together with proposed design details. Hard landscape details are to include, where applicable, those for any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features. Soft landscape details are to include detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation and spacings. The landscape plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and defects liability clause

2. In addition to the Tree Report and Survey submitted the applicant is requested to provide an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction -recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

i) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).

ii) Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate

iii) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.

iv) Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected

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and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.

v) Arboricultural Method Statement: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

vi) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.

vii) The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.

3. The applicant has provided little or no information as to the landscape and visual impact of the proposed development. The applicant is requested to provide a detailed landscape and visual impact assessment including photo montages for the proposed development.

4. Having regard to the size, scale and height of the proposed development, the applicant is requested to submit a Visual Impact Assessment identifying key viewpoints to the site from the surrounding area, including CGI of existing views and views of the proposed development.

5. Given the potential for the presence of Japanese Knotweed (*Reynoutria japonica*) within the proposed development site, the applicant is required to provide the following:

- A detailed survey must be undertaken by an approved environmental consultant for the presence of Japanese Knotweed and this must be submitted for the approval of the Planning Authority.
- If present on site an Invasive Species Management Plan must be provided which details how the Japanese Knotweed will be addressed. This Invasive Species Management Plan must be prepared by suitably qualified specialist who can demonstrate experience and technical abilities in invasive species management and control.

Please note that Japanese Knotweed can be far more extensive than the visible parts on the surface and that the underground parts of the plant may extend laterally up to 7 metres beyond this. Therefore, this survey must also note any knotweed adjoining the site. If Japanese Knotweed is confirmed, full details of a scheme for its eradication and/or control shall be submitted to and approved by the Planning Authority prior to the commencement of work on site.

6. A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the

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proposed drainage system for the development such as rain gardens, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.
- The applicant is referred to the recently published SDCC SuDS Design Guide for further information and guidance.

The above is considered reasonable and can be the subject of a **request for additional information**. Photomontages have been submitted though additional views are sought.

In particular, the proposed underground drainage storage tank is of considerable size. In the context of a greenfield development, there isn't any need for such a tank if sustainable drainage features are used as per South Dublin County Council policy.

Drainage

Irish Water has stated no objection, subject to conditions.

The Environmental Services Department has stated no objection, subject to a single condition:

“Prior to commencement of development submit a revised drawing showing swales with an overflow connection to the surface water system as part of SuDS (Sustainable Drainage System).”

As stated above, it is considered that on a greenfield site, natural SUDs and features such as blue roofs should capture, retain and direct rainwater to ground such that underground storage is not necessary excluding severe weather events. The applicant should be requested to adopt a natural SuDs strategy excluding the use of an underground tank unless sufficient reasons are shown for the inclusion of one. This can be the subject of a **request for additional information**.

Aviation Safety

The Department of Defence has objected to the development on the basis of height. The development would not be as tall as the permitted development under ABP-306602-20, and is not particularly tall for a warehouse.

The Department lists the following reasons (imperial measurements updated to metric by the author):

- a. The International Civil Aviation Organisation (ICAO) is an agency of the United Nations. It sets out the 'Standards and Recommended Practices' (SARP'S) for international aviation through the publication of 19 annexes.

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ICAO Annex 14 deals with airport surfaces to be protected to ensure safe instrument flight procedures at airports.

ICAO Annex 14 Obstacle Limitation Surfaces (OLS) are established at Casement Aerodrome.

b. A 15m warehouse at the proposed development location will penetrate the Inner Horizontal Surface (IHS), which is intended to protect aircraft which are visually maneuvering in the vicinity of an aerodrome. This surface begins at 131.6m above mean sea level (AMSL).

From the location information that is provided, it appears that the elevation of the site in question is approximately 125m. The planned warehouse will be 15m high giving a total height above sea level of 140m.

c. The area of the proposed development is regularly overflown by the following types of visually maneuvering aircraft:

1. Fixed wing aircraft operating in the standard and low-level Casement Aerodrome circuit patterns. The standard circuit pattern altitude is 1,300ft AMSL [396.24 m] and the low-level pattern altitude is 800ft AMSL [243.84 m].
2. Helicopter training traffic, operating to/from runway and non-runway locations at Casement Aerodrome, particularly when Runway 28 (previously Runway 29) is active
3. Helicopter traffic joining/departing Casement Aerodrome from/to South and South East.

d. The Department of Defence is not satisfied that the proposed development will not negatively impact flight operations in the vicinity of Casement Aerodrome. New penetrations of the IHS should not be permitted unless the new object is shielded by an existing immovable obstacle or, after an aeronautical study, it is found not to have a negative impact on safety or regularity of operations. It is not known whether the Developer has considered or provided any documentation on this matter.

e. In the event that this application is granted, the operation of cranes should be coordinated with Air Corps Air Traffic Services, no later than 28 days before use, contactable at airspaceandobstacles@defenceforces.ie or 01-4037681.

f. As the authority on military aviation, the Department of Defence wish to have an Independent Aviation Assessment carried out and submitted to us for our appraisal.

It is considered that the building is unlikely to have a major impact given the relative height of building on adjoining sites. However, it would be prudent to allow the applicant to respond to the Department's submission by way of **additional information**. The applicant should be requested to provide:

- Aviation Safety Assessment
- Section drawing (as per the advice in the Draft County Development Plan) showing relative land levels to the aerodrome.

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Screening for Environmental Impact Assessment

Having regard to the modest nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Screening for Appropriate Assessment

See below tables for screening for appropriate assessment.

Table 1: Description of the project and site characteristics

Planning File Reference	SD21A/0065
Brief description of the project	See description of development.
Brief description of site characteristics	See above description.
Application accompanied by a NIS Y/N	No.

Table 2: Identification of European Sites which may be impacted by the project

European Site	List of Qualifying Interest/ Special Conservation Interest	Distance from proposed development (km)	Connections (Source-Pathway- Receptor)	Considered further in screening Y/N
Glenasmole Valley SAC	3 Qualifying Interests CO001209.pdf (npws.ie)	3.7	None.	No
Wicklow Mountains SAC	13 Qualifying Interests ConservationObjectives.rdl (npws.ie)	5.3	None.	No
Rye Water Valley / Carton SAC	3 qualifying interests (see applicant's AA Screening Report)	8.4	None.	No
Red Bog, Kildare SAC	1 qualifying interest (see applicant's AA Screening Report)	11.8	None.	No
Poulaphouca Reservoir SPA	See applicant's report.	11.8	None.	No.
Wicklow Mountains SPA	2 Qualifying Interests - Merlin (Falco columbarius) [A098] Peregrine (Falco peregrinus) [A103] CO004040.pdf (npws.ie)	>15	None.	No
South Dublin Bay SAC	4 Qualifying Interests ConservationObjectives.rdl (npws.ie)	14.3	Weak hydrological pathway via River Camac and	Yes

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South Dublin Bay and River Tolka Estuary SPA	14 Qualifying Interests ConservationObjectives.rdl (npws.ie)	14.3	discharges from Ringsend WWTP.	Yes.
North Bull Island SPA	See applicants' report.	>15		Yes.

Table 3: Assessment of Likely Significant Effects

Identify all potential direct and indirect impacts (alone or in combination) that may have an effect on the conservation objectives of a European site, taking into account the size and scale of the project:	
Likely Impacts	Possible Significance of Impacts (duration, magnitude etc.)
<p>Construction phase</p> <ul style="list-style-type: none"> • Uncontrolled releases of silt, sediments and/or other pollutants to air due to earthworks • Surface water run-off containing silt, sediments and/or other pollutants into nearby waterbodies. • Surface water run-off containing silt, sediments and/or other pollutants into the local groundwater. • Waste generation during the Construction Phase comprising soils, construction and demolition wastes. • Increased noise, dust and/or vibrations as a result of construction activity. • Increased dust and air emissions from construction traffic. • Increased lighting in the vicinity as a result of construction activity. 	None.
<p>Operational phase e.g.</p> <ul style="list-style-type: none"> • Surface water drainage from the Site of the Proposed Development. • Increased lighting in the vicinity emitted from the Proposed Development; and • Increased human presence in the vicinity as a result of the Proposed Development. 	None.

Are 'mitigation' measures necessary to reach a conclusion that likely significant effects can be ruled out at screening?
Yes
No

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Table 4: Screening Determination Statement

Assessment of significance of effects:		
Describe how the proposed development (alone or in-combination) is/is <u>not likely</u> to have <u>significant</u> effects on European site(s) in view of its conservation objectives.		
Conclusion:		
	Indicate (X)	Recommendation
It is clear that there is no likelihood of significant effects on a European site	X	The proposal can be screened out. Appropriate assessment not required.
It is uncertain whether the proposal will have a significant effect on a European site		Request further information to complete screening Request NIS Refuse permission
Significant effects are likely		Request NIS Refuse permission
Completed by	SDCC Planning Department	
Date	19 th April 2021.	

Conclusion

The proposed development requires additional assessments and should be the subject of a request for additional information.

Recommendation

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. Sustainable Drainage Systems.

The applicant is requested to submit a comprehensive SUDS Management Plan and revised drainage and landscape drawings. The Plan should demonstrate - unless absolutely impossible - that this greenfield site can be developed without the need for significant underground storage of water. The Plan should demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network to greenfield run-off rates. A maintenance plan should also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as blue roofs, rain gardens, detention basins, filter drains, swales etc. In addition, the

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applicant should provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.
- The applicant is referred to the recently published SDCC SuDS Design Guide for further information and guidance.

2. Landscape Proposals

The applicant is requested to submit comprehensive and detailed landscape proposals for the development, prepared by a qualified Landscape Architect. Such proposals should include a scaled landscape plan(s) with cross-sections, showing the layout and hard and soft treatment of all boundaries, features, external areas and green spaces. The proposals shall be accompanied by specifications for materials, workmanship and maintenance, together with proposed design details. Hard landscape details are to include, where applicable, those for any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features. Soft landscape details are to include detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation and spacings. The landscape plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and defects liability clause.

3. Trees.

In addition to the Tree Report and Survey submitted the applicant is requested to provide an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction -recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- i) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
- ii) Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate
- iii) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.

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iv) Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.

v) Arboricultural Method Statement: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

vi) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.

vii) The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.

4. Additional Views.

Additional verified views and section drawings should be provided showing the relationship between the proposed development and permitted development to the west, and existing development to the south, as additional information. The applicant may wish to consult with the Planning Department prior to lodgement of additional views.

5. Invasive Species.

Given the potential for the presence of Japanese Knotweed (*Reynoutria japonica*) within the proposed development site, the applicant is required to provide the following:

- A detailed survey must be undertaken by an approved environmental consultant for the presence of Japanese Knotweed and this must be submitted for the approval of the Planning Authority.

- If present on site an Invasive Species Management Plan must be provided which details how the Japanese Knotweed will be addressed. This Invasive Species Management Plan must be prepared by suitably qualified specialist who can demonstrate experience and technical abilities in invasive species management and control.

Please note that Japanese Knotweed can be far more extensive than the visible parts on the surface and that the underground parts of the plant may extend laterally up to 7 metres beyond this. Therefore, this survey must also note any knotweed adjoining the site. If Japanese Knotweed is confirmed, full details of a scheme for its eradication and/or control shall be submitted to and approved by the Planning Authority prior to the commencement of work on site.

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6. Letter of Consent.

The entrances to the development site are located off a road which is not taken in charge. The applicant should show that they have consent to connect to the road network.

7. Access, Transport and Parking.

The applicant is requested to submit:

(a) a detail design of proposed vehicular and pedestrian accesses from Magna Avenue and Magna Drive, visibility splays shall be demonstrated at the proposed vehicular accesses.

(b) a swept path analysis for any emergency vehicle movements that would occur within the site.

(c) a revised layout of not less than 1:200 scale showing 10% vehicular parking spaces (7no.) to be equipped with electrical charging points. 100% of spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points. REASON: In the interest of sustainable transport.

8. Aviation Safety.

(a) The proposed development would breach in the inner horizontal surface (the 'relevant obstacle limitation surface') around Casement Aerodrome. The Inner Horizontal Surface of Casement Aerodrome is at elevation 131.6m OD. As per the request of the Department of Defence, the applicant is invited to submit an Aviation Safety Assessment.

(b) The applicant is requested to provide a longitudinal section drawing with the following details:

For the development:

- The elevation OD of the highest point, and elevation OD of the predominant heights, of the proposed development; and
- Elevations OD for a range of reference points at existing ground levels on the subject site.

For the relevant aerodrome/airport:

- The OD elevations of the relevant runway threshold, and its distance from the proposed development; and
- The horizontal distance of the subject site from the relevant runway.

Implementation and Monitoring (IM)

For the relevant 'obstacle limitation surfaces':

- The elevation(s) OD and the slope of any 'obstacle limitation surface(s)' extending above the site, as defined within current ICAO "Annex 14" requirements, and in accordance with current IAA Guidance Material 1.

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For the surroundings:

- Elevations OD of the tops of existing permanent obstacles in the vicinity of the site if applying the principle of 'shielding' (in accordance with International Civil Aviation Organisation (ICAO) and IAA Guidance Material in relation to this).

9. Planning Notices.

The planning notices identify the height of the structure as being 15.5m. Elevation drawings show the building to be as high as 16.5m in places. This should be reflected on revised notices by way of additional information, or else revised drawings provided showing that the development would be consistent with the original planning notices.

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REG. REF. SD22A/0065

LOCATION: Magna Avenue and Magna Drive, Citywest, Dublin 24




Jim Johnston,
Senior Executive Planner



Eoin Burke, Senior Planner

ORDER: I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Date: 19th April 2022



**Mick Mulhern, Director of Land Use,
Planning & Transportation**