



**THORNTON O'CONNOR**  
TOWN PLANNING

## **Response to a Request for Further Information**

**In respect of the proposed provision of a warehouse unit with ancillary office and staff facilities and associated development**

**At a 3.03 Ha site at Magna Avenue and Magna Drive, Citywest, Dublin 24**

**Submitted on Behalf of Rockface Developments Limited**

June 2022

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South Dublin County Council  
County Hall  
Tallaght  
Dublin 24  
D24 A3XC

Monday, 13<sup>th</sup> June 2022

Dear Sir/Madam

## **RESPONSE TO REQUEST FOR FURTHER INFORMATION**

**South Dublin County Council Register Reference SD22A/0065**

### **1.0 INTRODUCTION**

#### **1.1 Response to *Request for Further Information* by South Dublin County Council**

This letter is submitted by Thornton O'Connor Town Planning<sup>1</sup> on behalf of Rockface Developments Limited<sup>2</sup> in response to a *Request for Further Information* issued by South Dublin County Council dated 22<sup>nd</sup> April 2022, in respect of the proposed provision of a single unit warehouse development. The building will have a maximum height of 16.5m 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 No. ancillary car parking spaces; covered bicycle parking; HGV parking and yards<sup>3</sup>; 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 at a site at Magna Avenue and Magna Drive, Citywest, Dublin 24.

The Applicant has 6 months of receiving the Letter, in order to respond to the Request for Further Information i.e., up to 21<sup>st</sup> October 2022.

This response to the *Request for Further Information* has been prepared by Thornton O'Connor Town Planning in association with Kavanagh Burke Consulting Engineers<sup>3</sup>, Enviroguide Consulting<sup>4</sup>, Stephen Reid Consulting Engineer<sup>5</sup>, 3D Design Bureau<sup>6</sup> and O'Dwyer & Jones Design Partnership<sup>7</sup>.

<sup>1</sup> No. 1 Kilmacud Road Upper, Dundrum, Dublin 14.

<sup>2</sup> Unit 5, the Plaza, Greenogue Business Park, Rathcoole, Co. Dublin, Dublin, Ireland

<sup>3</sup> Unit F3, Block F Calmount Park, Calmount Avenue, Dublin 12, D12 PX28

<sup>4</sup> 3D Core C, Block 71, The Plaza Park West, Dublin, D12 F9TN

<sup>5</sup> Estuary House, New St, Malahide, Co. Dublin, K36 KH32

<sup>6</sup> 65 Rock Rd, Blackrock, Dublin, A94 PT62

<sup>7</sup> Leeson Park, Ranelagh, Dublin

## 1.2 Documents Enclosed

Some 6 No. copies of the documents listed below are enclosed with this Response to *Request for Further Information*.

### 1.2.1 Response Letter prepared by Thornton O'Connor Town Planning

- This Planning Response Letter prepared by Thornton O'Connor Town Planning, dated 13<sup>th</sup> June 2022.

### 1.2.2 Revised Drainage Design prepared by Kavanagh Burke Consulting Engineers

- Six copies of the revised Drainage Design Report outlining the requested SUDs Management Plans details.
- Six copies of the following drawing:

Drainage Drawings Prepared by Kavanagh Burke Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
D1720-D3_PL2	Drainage and Watermain Layout	1:500	A0

### 1.2.3 Revised Landscape Plan and Landscape Rationale prepared by Enviroguide Consulting

- Six copies of the landscape cover letter dated 8<sup>th</sup> June 2022
- Six copies of the following drawings:

Landscape Drawings Prepared by Enviroguide Consulting			
Drawing No.	Drawing Title	Scale	Size
FI-01	Additional Information Landscape Masterplan & Section	As Shown	A1
FI-02	Additional Information Boundary Treatments	As Shown	A1
FI-03	Additional Information Planting Details	As Shown	A1

### 1.2.4 Tree Survey, Tree Report and Tree Constraints and Protection Plan prepared by Enviroguide Consulting

- Six copies of the report entitled *Additional Information- Tree Report and Survey* in accordance with *BS 5837: 2012 Trees* in relation to design and construction recommendations.
- Six copies of the following drawing:

Trees Drawings Prepared by Enviroguide Consulting			
Drawing No.	Drawing Title	Scale	Size
P-01	Additional Information Tree Constraints and Protection Plan	As Shown	A1

**1.2.5 Revised Verified Views prepared by 3D Design Bureau and Additional Section Drawings prepared by Kavanagh Burke Consulting Engineers**

- Six copies of the additional Verified Views prepared by 3D Design Bureau.
- Six copies of the following drawings:

Drawings Prepared by Kavanagh Burke Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
D1720-GA-A07-PL2	Contiguous Elevation (Site Section AA)	1:250	A0
D1720-GA-AG10-PL2	Contiguous Elevation (Site Section DD & EE)	1:250	A0

**1.2.6 Revised Ecological Impact Assessment Report Report prepared by Enviroguide Consulting**

- Six copies of the revised Ecological Impact Assessment Report.

**1.2.7 Letter from McCartan & Burke Solicitors**

- Six copies of a Letter from McCartan & Burke Solicitors confirming that Rockface Developments Limited have the legal right and necessary consent to connect to private roads and services in Magna and Citywest Business Parks.

**1.2.8 Detailed Traffic Drawings prepared by Kavanagh Burke Consulting Engineers**

- Six copies of the following drawings:

Drawings Prepared by Kavanagh Burke Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
D1720-D1-PL2	Site Location Map	As Shown	A1
D1720-D2-PL2	Site Plan	As Shown	A1
D1720-D2-1-PL2	Site Plan with Swept Paths	As Shown	A1
D1720-D2-2-PL2	Access Details, Electrical Charging Areas & Sightlines	As Shown	A1

**1.2.9 Aviation Safety Assessment & Aeronautical Assessment Report prepared by O'Dwyer & Jones Design Partnership Aviation Planning & Architecture Consultants**

- Six copies of the report entitled *Aviation Safety Assessment & Aeronautical Assessment Report*.

**1.2.10 Revised Site Notice and Newspaper Notice prepared by Thornton O'Connor Town Planning**

- Six copies of the Further Information Site Notice and 1 No. original copy and 5 No. scanned copies of the Further Information Newspaper Notice highlighting that the maximum building height is 16.5 metres.

## 2.0 RESPONSE TO FURTHER INFORMATION REQUEST

The Planning Authority set out the following items in the *Request for Further Information*:

### 2.1 Item No. 1: Sustainable Drainage Systems

#### Item No. 1 states:

*'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 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. '[Our Emphasis].*

#### 2.1.1 The Applicant's Response to Item No. 1

##### Response to Item No. 1:

Please see the Drainage Design Report outlining the requested SUDs Management Plans details, revised Drainage and Watermain Layout *Drawing No. D1720-D3\_PL2* and Cover Letter prepared by Kavanagh Burke Consulting Engineers submitted with this response pack.

Due to several factors at the site, the inclusion of underground attenuation was not possible to provide for most of the site. However, an increased number of SUDs features are proposed to be incorporated into the development to couple with attenuation systems.

The Drainage Design Report states:

*'In considering the above surface water management solution, we considered all SuDS devices and given the industrial nature of the proposed operations on this site, the above solution of underground surface water attenuation plus a detention basin was decided on. In summary, a range of measures have been incorporated into the development to couple the attenuation systems as follows:*



- *Tree Pits (at the car parking area for source control as per landscaping details).*
- *Trapped Road Gullies (to collect run-off from all type of paved surfaces).*
- *Permeable paving (to the access road to the carparking).*
- *Grasscrete paving (to the car parking bays and to the fire tender access).*
- *Green roof (to the ancillary office roof).*
- *Restricted discharge (to the outlets of all attenuation systems for regional control).*
- *Silt trap and petrol interceptor (to the inlets of all attenuation systems for pollution prevention).'*

The inclusion of additional SUDs devices around the site will provide a means for run-off to infiltrate into the ground across some parts of the site. This approach will inevitably reduce the quantity of water that discharges from the site and into the existing surface water drainage network.

## 2.2 Item No. 2: Landscape Proposals

### Item No. 2 states:

*'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.'*

### 2.2.1 The Applicant's Response to Item 2:

#### Response to Item No. 2:

Please find the details on the requested specifications for materials, maintenance, proposed design details and detailed planting plans outlined in the landscape cover letter and the accompanying *Drawings Nos. FI-01 Additional Information Landscape Masterplan & Section, FI-02 Additional Information Boundary Treatments, FI-03 Additional Information Planting Details* prepared by Enviroguide Consulting submitted with this letter.

Regarding the proposed timescale for implementation, the Planting Details *drawing No. FI-03 Planting Details* notes that all landscape works to be completed within 1 year of practical



completion of building works and to include a minimum 18-month landscape maintenance period and defects liability clause.

### 2.3 Item No. 3: Trees

#### **Item No. 3 states:**

*'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 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.'*

#### **2.3.1 The Applicant's Response to Item No. 3**



### **Response to Item No. 3:**

Please see report entitled *Additional Information- Tree Report and Survey* and accompanying drawing *Additional Information Tree Constraints and Protection Plan* prepared by Enviroguide Consulting submitted with this letter.

The Tree Survey Report notes that:

*'The site itself has no trees on it but trees do exist close to the site boundaries and so this report has been commissioned to provide an arboricultural assessment of the adjoining trees to input into the design and layout of the project and to form part of the planning package for the project.'*

The Tree Survey Report also states that:

*'Offsite trees and shrubs were assessed during a site visit on the 3rd February 2022. The field data for the trees is contained in the accompanying Tree Survey Schedule. Tree location, BS5837 category, RPA and approximate crown shape are shown on the Tree Survey Drawing.'*

A total of 61 No. lime trees, 8 No. pine and 1 No. leylandii cypress and several cherry laurel shrubs were assessed off site as they are all located just outside the boundary of the application site. The full details on the individual trees assessed on the site are listed in the *Tree Survey Schedule* in the appendices of the *Tree Survey Report*.

## **2.4 Item No. 4: Additional Views**

### **Item No. 4 states:**

*'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.'*

### **2.4.1 The Applicant's Response to Item No. 4**

#### **Response to Item No. 4:**

Please see the additional verified views prepared by 3D Design Bureau submitted with this letter. The views as originally submitted with the application are VVM Nos.V1,V2, V3, and V4 and new additional views have been provided for this Response to Request for Further Information which are shown in VVM No. V5, V6 and V7. We respectfully submit that the views demonstrate that the proposed warehouse building can be assimilated into its context. The immediate local context is undergoing major change with the current construction of the residential development to the west of the site (granted permission in accordance with ABP Reg. Ref.306602) which includes heights of up to 23 metres for a 7 No. storey building.



Additional Site Section Drawings prepared by Kavanagh Burke Consulting Engineers are also submitted with this response to a request for further information (Drawings No. 1720-GA-A07-PL2 'Contiguous Elevation Site Section AA' and No. 1720-GA-A10-PL2 'Contiguous Elevation Site Section DD & EE') which aid in demonstrating the relationship between the proposed development and permitted development to the west, and existing development to the south.

We note that these drawings are to be viewed in conjunction with drawings and documents submitted under the original planning application as Contiguous Elevation Site Sections for B & C were previously submitted at application stage.

## 2.5 Item No. 5: Invasive Species

**Item No. 5 states:**

*'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.'*

### 2.5.1 The Applicant's Response to Item No. 5

**Response to Item No. 5:**

Please see the revised Ecological Impact Assessment Report prepared by Enviroguide Consulting, which states on page 19 that:

*'No species listed on the Third Schedule of European Communities (Birds and Natural Habitats) regulations (S.I 477 of 2011) including Japanese Knotweed (Reynoutria japonica) were recorded at the site.*

*No non-native/invasive species were observed on the Site of the Proposed Development during the surveys carried out on both the 19<sup>th</sup> of January and 28<sup>th</sup> of April 2022. Therefore, no Invasive Species Management Plan is required for the Site of the Proposed Development.'*

Thus, it is clear that an Invasive Species Management Plan is not required.

## 2.6 Item No. 6: Consent to Connect to the Road Network

### Item No. 6 states:

*'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.'*

### 2.6.1 The Applicant's Response to Item No. 6

#### Response to Item No. 6:

Please see enclosed Letter from McCartan & Burke Solicitors dated 23<sup>rd</sup> May 2022 which confirms that Rockface Developments Limited have the legal right and necessary consent to connect to private roads and services in Magna and Citywest Business Parks.

## 2.7 Item No. 7: Access, Transport and Parking

### Item No. 7 states:

*'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.'*

### 2.7.1 The Applicant's Response to Item No. 7

#### Response to Item No. 7:

Please see the enclosed *Drawings No. D1720-D1-PL2 Site Location Map, D1720-D2-PL2 Site Plan, D1720-D2-1-PL2 Site Plan with Swept Paths and D1720-D2-2-PL2 Access Details, Electrical Charging Areas & Sightlines* and Cover Letter prepared by Kavanagh Burke Consulting Engineers submitted with this letter.

The documents prepared by Kavanagh Burke Consulting Engineers show that the car parking and associated circulation is fully separated from HGV activity to ensure safe operation of both the car park and loading bays. The drawings show visibility splays at both entrances to the site, swept paths demonstrate that the site plan allows for adequate access and circulation for emergency vehicles and propose at least 10% of the vehicular parking spaces to be equipped with electrical charging points.

## 2.8 Item No. 8: Aviation Safety

### Item No. 8 states:

(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.*

#### **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).*

### 2.8.1 The Applicant's Response to Item No. 8

#### Response to Item No. 8:

Please see the report entitled *Aviation Safety Assessment & Aeronautical Assessment* prepared by O'Dwyer & Jones Aviation submitted with this letter.

The report concludes that



*'We are satisfied that the proposed warehouse development at the site at Magna Avenue and Magna Drive complies fully with all aviation and aeronautical requirements affecting the site.'*

Site and Longitudinal Section Drawings are provided on pages No. 6 and No. 10 of the Aviation Safety Report.

## **2.9 Item No. 9: Planning Notices**

**Item No. 9 states:**

*'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.'*

### **2.9.1 The Applicant's Response to Item No. 9**

**Response to Item No. 9:**

Revised Planning Notices are enclosed with this response, which reflect the maximum height of the structure at 16.5 metres. The Newspaper Notice was published in the *Irish Daily Star* newspaper on Monday, 13<sup>th</sup> June 2022 and the Site Notices have erected at the site.



### 3.0 CONCLUSION

We trust that this submission addresses the *Request for Further Information* by South Dublin County Council in respect of the subject development at a site at Magna Avenue and Magna Drive, Citywest, Dublin 24.

We look forward to receiving an acknowledgement and subsequent Decision in respect of the above.

Yours faithfully,

A handwritten signature in black ink that reads "Sadhbh O'Connor". The signature is written in a cursive, flowing style.

Sadhbh O'Connor  
Director  
Thornton O'Connor Town Planning

Encl.



