

20<sup>th</sup> June 2022

**The Secretary**  
**An Bord Pleanála**  
64 Marlborough Street  
Dublin 1  
D01 V902

**RE: Planning Ref 313591: Third Party Submission**

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Dear Sir or Madam,

We, Cross Vetpharm Group Ltd. (T/A Zoetis Tallaght), Broomhill Road, Tallaght, Dublin 24 ("CVGL"), wish to make a submission on the current SHD application at Ref 313591 – Lands at Broomhill Road and Unit 51 Broomhill Road, Tallaght, Dublin 24 ([www.broomhillroadshd.ie](http://www.broomhillroadshd.ie)).

### **Background Information**

Our premises neighbors the site subject to this SHD application – please see Figure 1 below.

The proposed development has the potential to seriously injure the continued operations of our facility which has been operating at this location for circa 47 years.

CVGL is a pharmaceutical company that over the years has manufactured several veterinary products for the treatment of animals across the globe. We are currently the single global supplier of Orbeseal, a sterile intramammary product for the prophylactic treatment of mastitis in cows. The manufacturing process is an aseptic fill and finish process which is very sensitive to raw material and packaging contamination issues.

We currently employ a total of 70. This includes several people from our community and we have for nearly five decades employed hundreds of people from the local community on both a full and part time basis.

At all times and regardless of the product portfolio manufactured at our facility, we have maintained a good relationship with the local authority, South Dublin County Council. We have also had an excellent relationship with our neighbors and other members of our community. We have supported several initiatives in our area (Food Cloud / Cheeverstown, etc.).

Our facility is a 24/day operation varying between 5 and 7 days/week depending on output requirements.

The proposed development will be immediately to rear of our facility (See Fig.1 (area in red)):



## **Comments on the SHD Application**

### **Lack of Consultation:**

The first we heard about this application was when we noted the site notices. We would have considered that in accordance with all best practice guidelines that the applicant, Garyaron Homes Limited (the "Applicant"), would have engaged with us in a meaningful manner during their design process. Such consultation could have afforded them the opportunity to understand the sensitive nature of our operations and what measures could have been undertaken during their design to mitigate such impacts.

### **Potential Impacts arising during the Construction Works:**

In reviewing the planning documentation, it is clear that the applicant has not given our facility the necessary site-specific evaluation that we consider would be warranted for a development of this scale. We have highlighted some examples below to support our position.

### **ESB Substation:**

There is an existing ESB substation that is currently providing electricity to our site that is proposed to be demolished. However, no details have been provided what temporary or long-term impacts that this proposal will have on our facility. Our operations cannot be maintained without a continuous electricity supply.

### **Dust Emissions:**

The Applicant refers to the IAQM Guidance on dust from Construction and Demolition work, but no such risk assessment was completed in support of this application. This means that there were no identification of sensitive receptors (close to or far from the site), there was no estimation of the magnitude of dust expected to be generated from their demolition and construction activities. We find this oversight difficult to comprehend considering they adjoin a highly sensitive pharmaceutical facility.

### **Noise Emissions:**

Our facility was not identified within their assessment as a noise sensitive receptor, rather the Applicant refers to proximity to commercial industrial sites. The Applicant concluded that these adjoining sites are likely to experience a 'moderate' noise impact, however, no additional emphasis or impact of this impact on our operations was considered.

### **Vibration Impacts:**

The Applicant notes, in their assessment, that vibration levels will be perceptible to occupants of the nearest buildings but no assessment was undertaken. We operate some very sensitive monitoring equipment that would be very sensitive to any such vibration.

### **Vermin:**

The nature of our operations are extremely sensitive to any impacts by pests, but this was not considered as part of the application. Only generic statements were provided by the Applicant such as: *"A pest control operator will be appointed as required to manage pest onsite during the construction phase of the project"*.

### **Temporary Car-Parking:**

It is stated by the Applicant: *"It is estimated that there will initially be 40 - 60 staff on site on a typical day, however during peak construction periods this is expected to fluctuate up to 100-150 staff and contractors on site per day"*. However, a construction site layout drawing identifies only 34 parking spaces. We would have a serious concern that contractors working on the site will park on the roads surrounding the site, thereby impacting on our operations.

### **Construction Traffic:**

A comprehensive transportation assessment was submitted in support of the application in regard to operational traffic, however there is a complete lack of detail on the assessment of construction traffic. There will be different phases of construction, each will involve different volumes of traffic. This level of assessment should have been undertaken for a development of this scale.

### **Security Concerns:**

There is minimal consideration of the security implications for our facility during both construction and operational phases.

### **Operational Considerations:**

The area which is proposed to be redeveloped was historically zoned for industrial purposes primarily and it is located in an established area populated by industrial uses and buildings. It is of concern to us that this site has been rezoned for domestic / commercial use recently by SDCC. The principal concern that we have is the change of land use the proposed development will have on our operations and the lack of consideration that this change was given. We would expect some type of a buffer to be to differentiate between residential and industrial land uses. If the proposed development receives the necessary planning consent, we will have a high-rise residential development overlooking our property after 47 years in operation. We have concerns that as our operations have not been properly evaluated by the Applicant, that their design has not considered emissions arising from our facility. Hence there is a real potential that we will be subject to complaints from future occupiers of the residential units when we have never had such complaints previously.

The external lighting study that was undertaken by the Applicant focused more on mitigating impacts on bats as opposed to considering what impacts the proposed lighting will have on our operations.

## Conclusions

We are particularly disappointed that Garyaron Homes Limited, proposing the development, did not engage with us in any way during their design to understand our business and how it might be impacted by their proposal.

We acknowledge that the application is supported with a lot of different technical reports, but in our opinion a lot of the information provided is of a generic nature. The application does not consider to the required level of detail the impact that both the construction and operation of such a residential development would have on the operations of a highly specialised pharmaceutical development on immediately adjoining lands. Specifically the equipment we use to manufacture our product is extremely sensitive in nature and could be readily impacted by any of the accepted vibrational and dust impacts that will arise during the construction phase of this proposed development.

In conclusion, we respectfully request that the Bord gives detailed consideration to the points that we have raised in the evaluation of this application.

Sincerely,



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Susan McCabe  
Site Leader