Planning Department South Dublin County Counc County Hall Tallaght, Dublin 24, D24 A3XC



Brenton Suite
36 Mount Street Upper
Dublin 2
D02 Y982
25th October 2022

RE: ADDITIONAL INFORMATION - REG. REF. SD22A/0150
Dated 18th July 2022

ADDITIONAL INFORMATION

Dear Sir / Madam,

HA Design Studio, 36 Mount Street Upper, Dublin 2, on behalf of our client Bradawl Limited, wish to respond to the Additional Information Request from South Dublin County Council.

Proposed Development: Relocation of 3 fuel pumps and the reconfiguration of permitted fuel islands from 1 long fuel island and 1 small fuel island to now provide for 3 small fuel islands, demolition/removal of single storey building along southern boundary and 1 new truck wash to southwestern boundary of site; Planning permission is sought to remove 1 existing truck wash along the western boundary, demolition/removal of existing storage building to the western boundary and alterations to internal road layout to include directional arrows.

Item 1:

The applicant is requested to provide a Noise Impact Assessment which should address the following: (a) How the development has impacted within the residential area of Brownsbarn Wood, in particular those houses and the public green closest to the development site.

- (b) How the development can be altered to reduce any such impact identified under (a).
- (c) If applicable, how the development has been designed or redesigned as the case may be to ensure no negative impacts on the adjoining residential area.

Response:

Please review attached report as prepared by Dalton Acoustics Ltd. / Sound Test Ireland

Item 2: Air Quality

The applicant is requested to provide a Air Quality and Odour Assessment which should address the following:

- (a) How the development has impacted within the residential area of Brownsbarn Wood, in particular those houses and the public green closest to the development site.
- (b) How the development can be altered to reduce any such impact identified under (a).
- (c) If applicable, how the development has been designed or redesigned as the case may be to ensure no negative impacts on the adjoining residential area.

Response:

Please review attached report as prepared by AWN Consulting.

Item 3: Trees

The applicant shall undertake a Tree Survey and, using all available information, provide an Arboricultural Impact Assessement to provide:

- (a) a clear record of the trees removed as part of the unauthorised development which has already taken place; (b) a clear record of the remaining trees;
- (c) a protection plan for the remaining trees;
- (d) a planting plan to replace the removed trees or otherwise to restore and/or enhance the previous boundary condition.

The proposals shall have regard both to the impact on the adjoining residential area and on ecological considerations (biodiversity, green infrastructure, sustainable drainage, flooding).

Response:

Please review attached report as prepared by Charles McCorkell Arboricultural Consulting and Jane McCorkell Design.

Item 4: Boundary Treatment

The applicant is requested to provide elevation and site section drawings at a scale of no less than 1:200, as follows:

- (a) (i) Elevation Drawings showing the prior boundary condition at the boundary with Brownsbarn Wood.
- (ii) Site Sections drawings through that boundary showing the relationship between the development site and Brownsbarn Wood prior to the unauthorised works.

- (b) (i) Elevation Drawings showing the existing boundary condition at the boundary with Brownsbard Wood.
- (ii) Site Sections drawings through that boundary showing the relationship between the development site and Brownsbarn Wood at present.
- (c) (i) Elevation Drawings showing the proopsed boundary condition at the boundary with Brownsbard Wood, if alterations are proposed.
- (ii) Site Sections drawings through that boundary showing the proposed relationship between the development site and Brownsbarn Wood, if alterations are proposed.

Response:

Please review enclosed compliance drawings No. Al-200 prepared by HADS.

Item 5: Landscape Plan

There are concerns with the lack of information submitted in terms of a landscaping scheme and boundary treatment for the proposed development. The applicant is requested to provide a landscape design including details of boundary treatment for the proposed development.

- (a) The applicant shall provide a detailed landscape plan with full works specification, that accords with the specifications and requirements of the Public Realm Section. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including integrated/bio retention tree pits.
- (b) In addition, the applicant is requested also submit a landscape rationale. The landscape proposals to be prepared by a suitably qualified landscape architect.

Response:

Please review enclosed report and drawings as prepared by Jane McCorkell Design.

Item 6: Green Infrastructure

The applicant is requested to submit green infrastructure proposals to help mitigate and compensate for the impact of the proposed development on existing boundary vegetation. 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. Response shall include drawings.

Response:

Please review enclosed report and drawings as prepared by Tent Engineering Ltd.

Item 7: Sustainable Drainage

The applicant has not proposed any SuDS (Sustainable Drainage Systems) features for the proposed development. The applicant is requested to submit plans and cross-sectional views clearly showing proposed Sustainable Drainage Systems (SuDS) features for the development.

- a) A drawing to show how surface water shall be attenuated to greenfield run off rates. It is unclear how much attenuation in total is provided for the development. Submit a report and drawing showing how much surface water attenuation in m3 is provided for the development. Also submit a drawing showing where the surface water attenuation will be provided for the development.
- b) The applicant shall show natural SUDS features for the development such as Green roofs, swales, tree pits, permeable paving, and other such SuDS and show what attenuation capacity is provided by such SuDS.
- c) The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.
- d) Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.
- e) Tree pits incorporating SUDS features should include a deep cellular water storage/attenuation area below the surface which acts as a soak away allowing surface water to infiltrate into the ground.
- f) The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.
- g) The applicant is requested to submit a report showing surface water attenuation calculations for proposed development.

Response:

Please review enclosed report and drawings as prepared by Tent Engineering Ltd.

Item 8: Roads

The applicant is requested to provide a revised set of drawings which shows:

- (a) Existing yard layout
- (b) Proposed islands with dimensions
- (c) Proposed parking arrangements (bike/car/truck)
- (d) Proposed lining arrangement
- (e) AutoTRAK path and analysis for (i) Fuelling area approach/exit (each of the paths) (ii) Truck wash approach/exit

Response:

Please review attached drawings as prepared by Tent Engineering Ltd.

Item 9: Operations

The applicant is requested to provide a written rationale and comment on the additional fuel island and truck wash, with regards to their impact on the capacity, frequency, and intensity of operations on the site. This should detail the expected additional traffic, additional activities that can reasonably be expected to be occurring on-site at any one time, and any related matters.

Response:

The applicant wishes to confirm that the proposed development does not result in an intensification of operations on the site. It is submitted to the Council that permission was granted for 3 no. fuel pumps in one long island and one short island under Ref. SD16A/0326. The current proposal also provides for 3 no. fuel pumps in 3 no. fuel islands. However, the additional fuel island will not generate additional capacity or frequency of use noting that there are no additional fuel pumps proposed and that the same number of traffic movements accessing the permitted 3 no. fuel pumps will be experienced as the proposed 3 no. fuel pumps (i.e. the permitted long fuel island comprised 2 fuel pumps which could both be used at the same time.). The current proposal provides for the reconfiguration of the fuel pumps but does not increase the fuel pumps and thus does not increase the number of patrons that can be fuelling their HGVs at the same time. It is also submitted to the council that the truck wash is ancillary to the fuelling pumps and patrons will be accessing the site to avail of fuel with the use of the truck wash ancillary to this (i.e. it is anticipated that 1/3 of HGVs getting fuel will avail of the use of the truck wash after fuelling). It is also important to note that the proposed truck wash will replace the existing and permitted truck wash and therefore there is no additional truck wash proposed on site. Therefore, there is no increase in capacity, frequency or intensity of operations on site noting that the truck wash is proposed to replace the existing truck wash and that there are no additional fuel pumps proposed to that permitted on site with only a reconfiguration of the fuel pumps proposed, it is not anticipated that there will be any additional traffic or activities as a result of the reconfiguration of the fuel pumps and the relocation of the truck wash.

Item 10: Flood Risk

The applicant is requested to submit a flood risk report to show what if any flood risk there is for proposed and existing development.

Response:

Please review attached report as prepared by Tent Engineering Ltd.

Item 11: Screening for Appropriate Assessment.

The applicant has not provided information regarding screening for appropriate assessment, nor have drainage layout or SUDs details been provided. Irish Water maps show that a nearby surface water pipe leads directly into the Camac River, providing a direct hydrological connection with Dublin Bay. Given the nature of the proposed operations on the site and the potential for pollutants to be diverted into the Camac River, the applicant should provide a screening report for Appropriate Assessment as part of additional information.

Response:

Please review attached report as prepared by Altemar Environmental Consultants

Yours sincerely,

Justin Halpin

Director of Architecture

For and on behalf of HA Design Studio Ltd.

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