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THORNTON O'CONNOR
TOWN PLANNING

South Dublin County Council
County Hall
Tallaght
Dublin 24
D24 A3XC



Thursday, 3rd November 2022

Dear Sir/Madam

RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION

South Dublin County Council Register Reference SD22A/0290

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 Planning¹ on behalf of Rockface Developments Limited² in response to a *Request for Further Information* issued by South Dublin County Council, dated 22nd August 2022, in respect of the proposed provision of a warehouse with ancillary office and staff facilities and associated development.

The development as applied for comprises:

'The provision of a warehouse with ancillary office and staff facilities and associated development. The warehouse will have a maximum height of 18 metres with a gross floor area of 11,691 sq m including a warehouse area (10,604 sq m), ancillary staff facilities (499 sq m) and ancillary office area (588 sq m).

The development will also include: a vehicular and pedestrian entrance to the site from Kingswood Road to the north-east; a separate HGV entrance from Kingswood Avenue to the south-east; 64 No. ancillary car parking spaces; bicycle parking; HGV parking and yard; level access goods doors; dock levellers; access gates; hard and soft landscaping; canopy; lighting; boundary treatments; ESB substation; plant; and all associated site development works above and below ground.'

The Applicant has a time period of six months in order to respond to the *Request for Further Information* i.e., up to 21st February 2023.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

² Unit 5, the Plaza, Greenogue Business Park, Rathcoole, Co. Dublin, Dublin, Ireland



This response to the *Request for Further Information* has been prepared by Thornton O'Connor Town Planning in association with Kavanagh Burke Consulting Engineers³, Enviroguide Consulting Engineers⁴, and Stephen Reid Consulting Engineer⁵.

1.2 Changes Made to Scheme to Respond to Request for Further Information

Minor changes were made to the scheme to comply with the Request as detailed below:

- Red line boundary extended to increase site area from 2.56 Ha. to 2.629 Ha (Letter of Consent from Citywest Developments Limited enclosed) to allow for footpath improvements;
- Permeable surfacing amended and now applies to the cars access road only - *previously proposed to car access road, parking bays and to the fire tender route*;
- Grasscrete surfacing is now proposed to the car parking bays and to the fire tender route;
- Additional green walls added;
- Tree pits and swales provided to car parking area;
- Pond/basin proposed to the north-west yard corner, designed to store up to 1 in 100 y storm runoff collected from sub- catchment #1 (3/4 of warehouse roof runoff);
- Reduced volume of underground attenuation system;
- Inclusion of bird and bat boxes in the scheme.

1.3 Documents Enclosed

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

1.3.1 Response Letter prepared by Thornton O'Connor Town Planning

This Planning Response Letter prepared by Thornton O'Connor Town Planning, dated 3rd November 2022.

1.3.2 Response to Additional Information Request prepared by Kavanagh Burke Consulting Engineers

- 'Response to Additional Information Request for Planning Application Reg. Ref. SD22A/0290', dated 26th October 2022.

1.3.3 Drainage Design Report Prepared by Kavanagh Burke Consulting Engineers

- 'Drainage Design Report', dated 26th October 2022

1.3.4 Letter of Consent from Citywest Developments Ltd

- A Letter of Consent prepared by Citywest Developments Ltd, dated 14th October 2022.

³ Unit F3, Block F Calmount Park, Calmount Avenue, Dublin 12, D12 PX28

⁴ 3D Core C, Block 71, The Plaza Park West, Dublin, D12 F9TN

⁵ Estuary House, New St, Malahide, Co. Dublin, K36 KH32

1.3.5 Response from Stephen Reid Consulting on Roads and Access

- Technical Note prepared by Stephen Reid Consulting Traffic and Transportation setting out the RFI response to traffic matters, dated 19th October 2022.

1.3.6 Cover Letter Prepared by Enviroguide Consulting Engineers

- A Cover Letter prepared by Enviroguide Consulting, dated 8th June 2022.

1.3.7 Landscape Management and Maintenance Plan Prepared by Enviroguide Consulting Engineers

- 'Landscape Management and Maintenance Plan' prepared by Enviroguide Consulting Engineers, dated October 2022.

1.3.8 Flood Risk Assessment Report Prepared by Enviroguide Consulting Engineers

- 'Flood Risk Assessment Report' prepared by Enviroguide Consulting Engineers, dated October 2022.

1.3.9 Green Infrastructure Plan Report Prepared by Enviroguide Consulting Engineers

- 'Green Infrastructure Report & Landscape Rationale' Prepared by Enviroguide Consulting Engineers, dated October 2022.

1.3.10 Drawings Prepared by Enviroguide Consulting Engineers

Drawings No.	Title	Scale	Size
P-01	Master Plan	1:500	A1
P-02	Sections & Boundary Treatments	As Shown	A1
P-03	Planting Plan/Specifications	1:500	A1
P-04	Hard Boundary, Green Wall, SUDS, Bird and Bat Boxes	1:500	A1

1.3.11 Drawings Prepared by Kavanagh Burke Consulting Engineers

Drawings No.	Title	Scale	Size
Civil			
D1736 - D1	SITE LOCATION MAP	1:1000	A2
D1736 - D2	SITE PLAN	1:500	A1
D1736 - D2-1	PEDESTRIAN CROSSING DETAILS	1:100	A1
D1736 - D2-2	SWEPTH PATHS	1:500	A1
D1736 - D3	DRAINAGE & WATERMAIN LAYOUT	1:500	A1
D1736 - D4	SuDS & DRAINAGE DETAILS	NTS	A1
Architectural			
D1736 - GA-A01	GROUND FLOOR PLAN	1:200	A1
D1736 - GA-A02	FIRST FLOOR PLAN	1:200	A1
D1736 - GA-A03	SECOND FLOOR PLAN	1:200	A1



D1736 – GA-Ao4	ANCILLARY OFFICES & STAFF FACILITIES BLOCK	1:100	A1
D1736 – GA-AO5	SECTION	1:200	A2
D1736 – GA-Ao6	ELEVATIONS	1:200	A1
D1736 – GA-Ao7	CONTIGUOUS ELEVATIONS	1:250	Ao

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:

SUDS

The applicant has not proposed any SuDS (Sustainable Drainage Systems) features for the proposed development. The applicant proposes to use attenuation tanks (underground surface water attention) in order to manage surface water drainage throughout the site, this is not acceptable to the Public Realm Section and is contrary to relevant policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2. The applicant is required to submit a drawing in plan 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 should try where possible to reduce the need for the proposed Stormtech attenuation system. The applicant should note that the planning authority does not look favourably on the inclusion of such measures, with a clear preference for natural SuDS measures. Where additional SuDS can be provided the size of proposed Stormtech attenuation system shall be reduced in equivalent m³ capacity accordingly.*

2.1.1 The Applicant's Response to Item No. 1

Response to Item No. 1:

Please see the enclosed 'Response to Additional Information Request for Planning Application Reg. Ref. SD22A/0290' prepared by Kavanagh Burke Consulting engineers, outlining the requested SUDs Management strategy, and revised Drainage and Watermain Layout Drawing No. D1736-D3_PL2 prepared by Kavanagh Burke Consulting Engineers submitted with this response pack.

The SUDs design includes:

- Permeable and Grasscrete surfacing;
- Green walls;
- Tree pits and swales; and
- Pond located to the south-western corner of the site.

2.2 Item No. 2: Roads and Access

Item No. 2 states:

'The following items are required to allow for a full assessment of the development in relation to roads and access:

- *A revised layout of the proposed vehicle access locations, showing the layouts for right turning into the development.*
- *A revised layout clearly specifying the sq.m of the HGV parking to be provided*
- *From the submission it is not clear if any areas are to be taken in charge by the local authority. A drawing is required clearly showing any areas to be taken in charge by the local authority.*
- *A drawing showing AutoTRAK manoeuvres for large vehicles accessing and egressing, including articulated lorries, emergency vehicles, bin lorries.*
- *A drawing identifying the location of refuse collection points.*
- *A revised layout not less than 1:100 scale showing upgraded footpaths and cycle ways on Kingswood Way and Kingswood Road, including pedestrian crossings at car and HGV entrances. Footpaths should be a minimum of 2m in width. This may require alterations to the red line boundary and additional consent from the local authority in relation to works outside the ownership boundary of the applicant.*

2.2.1 The Applicant's Response to Item 2:

Response to Item No. 2:

Stephen Reid Consulting Traffic and Transportation has provided a detailed response to Item No. 2 in a separate Technical Note which is enclosed.



Below is a summary of the key points included in the Technical Note for ease of reference:

Bullet Point 1:

Traffic counts were undertaken in January 2022 at the Kingswood Avenue/Kingswood Road roundabout junction (Citywest Roundabout 3a). The TIA determined that there would be 13 arrivals into the staff car park during the AM peak hour (8 right turners from Kingswood Road) and 9 arrivals (vans and HGVs combined) into the delivery yard access (4 right turners from Kingswood Avenue).

The morning peak presents the worst-case in terms of expected right turning demand in a single hour. The network peak hour two-way passing traffic during the 2023 opening year was identified as 279 vehicles (AM) and 269 vehicles (PM) on Kingswood Avenue, and 457 vehicles (AM) and 471 vehicles (PM) on Kingswood Road. Both of the proposed access locations (and the approaches to them) have good sightlines and forward visibility for approaching traffic. The roads are subject to a 50kph speed limit. **On this basis and with regard to the relatively modest passing traffic flows on both roads it is submitted that a right turning storage lane would not be warranted for either access point.** It is noted that there are multiple access points on Kingswood Avenue and Kingswood Road serving similar developments with a greater level of parking provision and traffic demand and none of these have right storage lanes provided and operate satisfactorily.'

Bullet Point 2:

Refer to the Site Plan (Dwg. No. D1736 – D2) prepared by Kavanagh Burke Consulting Engineers submitted with this RFI.

Bullet Point 3:

No areas are proposed to be taken in charge.

Bullet Point 4:

Please refer to the Site Plan (Dwg. No. D1736 – D2) prepared by Kavanagh Burke Consulting Engineers for AutoTracking of the HGV access by 16.5m articulated delivery trucks, and fire tender access of the staff parking access.

Bullet Point 5:

Please refer to the Kavanagh Burke Consulting Engineers Site Plan (Dwg. No. D1736 – D2) for the location of the refuse collection point.

Bullet Point 6:

Please refer to the Kavanagh Burke Consulting Engineers Site Plan (Dwg. No. D1736 – D2) for details relating to footpath upgrades proposed as part of this application. Citywest Developments Limited have provided consent for the inclusion of part of their lands within the subject application to allow for the upgrade to the footpath.

It is noted that Citywest Developments Limited have not provided a cycle network within the Estate but if they choose to do so in the future, a generous setback is provided at the subject site to allow Citywest to provide such infrastructure on their lands.

2.3 Item No. 3: Landscape Proposals

Item No. 3 states:

'Landscape Proposals

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 additional information and detail of boundary treatment for the proposed development. 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 and detailed design of SUDs features including integrated/bio retention tree pits. The applicant is requested to provide information and additional details of proposed boundary treatment indicating the positions, design, materials and type of boundary treatments to be erected. In addition, the applicant shall also submit a landscape rationale. The landscape proposals to be prepared by a suitably qualified landscape architect.'

2.3.1 The Applicant's Response to Item No. 3

Response to Item No. 3:

Please see reports entitled '*Green Infrastructure Report*' and '*Landscape Rationale and Landscape Management and Maintenance Plan*' prepared by Enviroguide Consulting Engineers. Enclosed drawings PO1-PO4 supplement these reports. Section 3.2 of the Green Infrastructure Report and Landscape Rationale report outlines the following public realm and boundary treatments:

'To the south west and north west boundaries it is proposed to develop a network of woodland understory, native hedgerows and tree planting to form a green buffer between the residential and office developments that adjoin the site on these boundaries.'

'A number of green walls are also to be incorporated within the elevations of the building which will visually descale and blur the edges of the proposed building.'

The Green Infrastructure report states the following with respect to SUDS:

'The SuDS details have been coordinated with Kavanagh Burke Engineers and comply with the requirements of 'South Dublin Co. Council SuDS Explanatory, Design and Evaluation Guide 2022'. The specific SuDS measures proposed include:

- *Swales*
- *Bioretention areas*
- *Permeable paving.'*

2.4 Item No. 4: Green Infrastructure

Item No. 4 states:

'Green Infrastructure

The applicant is requested to submit a Green Infrastructure Plan and Green Infrastructure proposals to help mitigate and compensate for the impact of the proposed development on existing vegetation within the subject site. 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.'

2.4.1 The Applicant's Response to Item No. 4

Response to Item No. 4:

Please see the Green Infrastructure Report enclosed entitled *'Green Infrastructure Report & Landscape Rationale'* prepared by Enviroguide Consulting Engineers. This report contains details of green infrastructure and landscape architectural proposals, public realm and boundary treatments, internal green infrastructure and SuDS and biodiversity. It should be read in conjunction with the *'Landscape Management and Maintenance Plan'* also prepared by Enviroguide Consulting Engineers. Drawings No. P-02 and P-03 also compliment these reports with planting details.

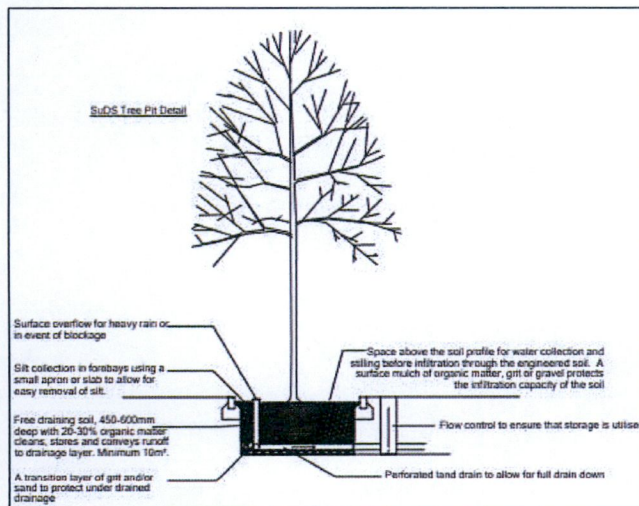


Figure 2.4: SuDS Tree Pit Details

Source: Extracted from Drawing No. P-03 Prepared by Enviroguide Consulting Engineers

2.5 Item No. 5: Landscape Management Plan and Maintenance Plan

Item No. 5 states:

'Landscape Management and Maintenance Plan

The applicant is requested to submit a Landscape and Soft Works Management and Maintenance Plan for the proposed development for the approval of the Planning Authority.'

2.5.1 The Applicant's Response to Item No. 5

Response to Item No. 5:

Please see report entitled 'Landscape Management and Maintenance Plan' prepared by Enviroguide Consulting Engineers. This report details the specifications for supply of plants and groundwork and grass establishment.

2.6 Item No. 6: Bird boxes and bat boxes/tubes

Item No. 6 states:

'Bird boxes and bat boxes/tubes

The applicant is requested to provide a scheme for the erection of bird boxes and bat boxes/tubes throughout the development.'

2.6.1 The Applicant's Response to Item No. 6

Response to Item No. 6:

Please see enclosed 'Landscape Masterplan' prepared by Enviroguide Consulting Engineers which indicates the locations of the bird and bat boxes on the site. Figure 2.6 below shows the proposed locations of the bird/bat boxes now proposed on the site.

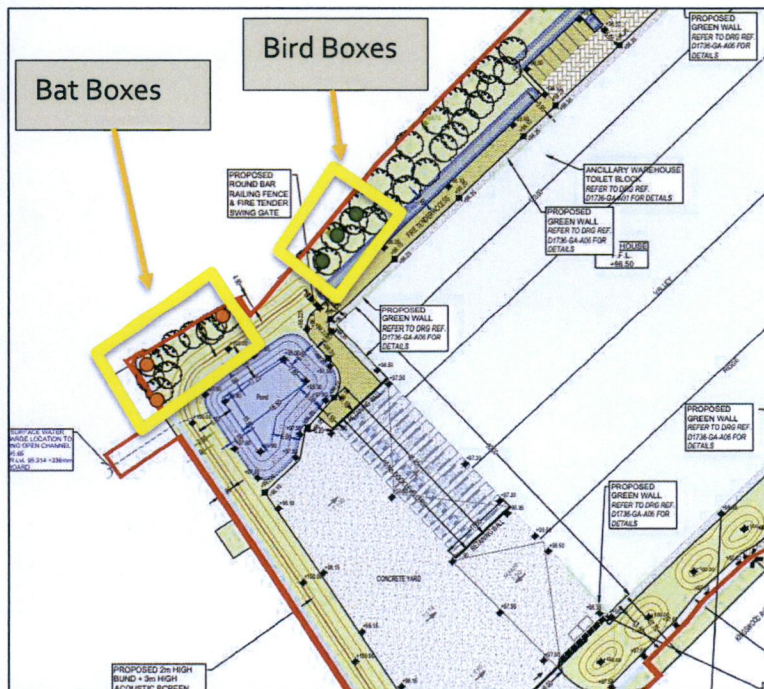


Figure 2.6: Location of Bird and Bat Boxes

Source: Drawing No. P-04 Prepared by Enviroguide Consulting Engineers, Annotated By Thornton O'Connor Town Planning, 2022.

As shown on Figure 2.6 above, there are 3 No. bird boxes and 3 No. bat boxes included within the scheme. The bird boxes are located along the western boundary of the site and the bat boxes are located in the south western corner of the site.

2.7 Item No. 7: North-East Elevation

Item No. 7 states:

'The applicant is requested to amend the north-east elevation to provide additional warehouse wall screening, to soften the impact of the warehouse at this location.'

2.7.1 The Applicant's Response to Item No. 7

Response to Item No. 7:

Please see the enclosed elevational drawings prepared by Kavanagh Burke Consulting Engineers. Drawing No. D1736-GA_Ao6 shows the proposed elevational changes to the North-East Elevation which includes additional wall screening. There has been an increase in green walls to all four sides of the building. The original elevation as provided in the as-logged scheme can be seen in contrast to the amended RFI elevation below:

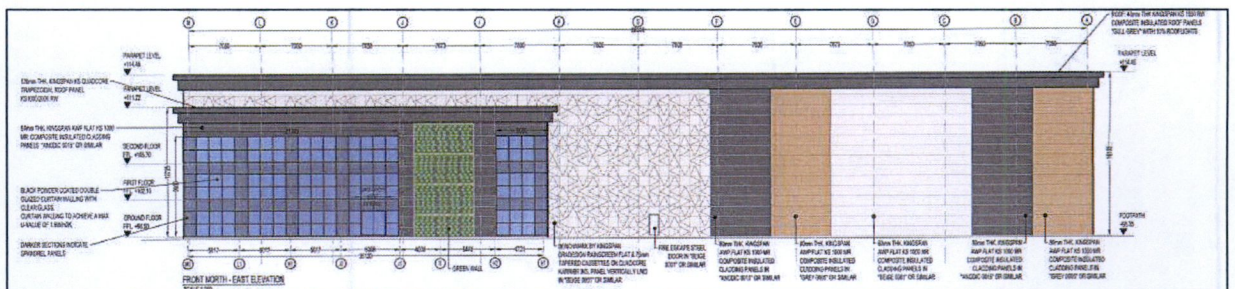


Figure 2.7: Original North-East Elevation

Source: Extracted from SDCC Reg. Ref SD22A/0290

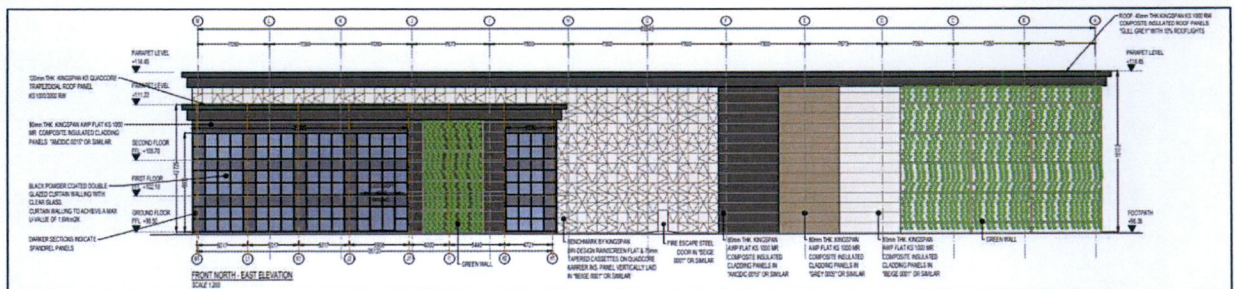


Figure 2.8: Amended RFI Stage North-East Elevation

Source: Kavanagh Burke Consulting Engineers Drawing No. D1736-GA_Ao6

2.8 Item No. 8: Relationship between Landscaping and Existing Office Development

Item No. 8 states:

'The applicant is requested to clarify the relationship between landscaping proposals and the existing office development to the north. In addressing this relationship, the applicant shall clarify the exact site boundary up to the office development, clarifying who currently manages the grassed land between the indicated site boundary and the assumed boundary of the office development.'

2.8.1 The Applicant's Response to Item No. 8

Response to Item No. 8:

Kavanagh Burke prepared a Site Plan (Dwg. No. D1736 – D2) which shows the office development to the north of the subject site. The red line on drawing No. D1736 – D2 denotes the land which is under the ownership of the applicant and is proposed to be landscaped as part of the subject scheme.

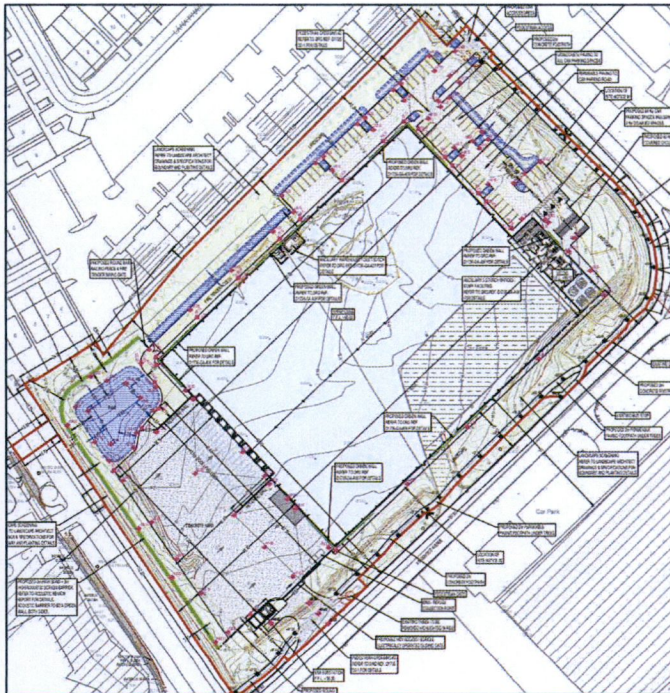


Figure 2.9: Site Plan Prepared by Kavanagh Burke Displaying the Land up to the Office Development to the North.

Source: Drawing No. D1736 – D2 Prepared By Kavanagh Burke Consulting.

In their response letter, Enviroguide Consulting Engineers state:

'The exact boundary lies along the footpath edge of the existing office development to the north. The grass land is maintained by City West management.'



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 Kingswood Road & Kingswood Avenue, Citywest Business Campus, 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".

Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

Encl.