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**MMcK/227501.0562L01**  
**08 November 2022**

**Planning Department,  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24**

Dear Sir or Madam,

**RE:** South Dublin County Council Planning Application Ref. SD22A/0099  
Calmount Road Development

**Applicant:** Blackwin Limited

South Dublin County Council Planning Application Ref. SD22A/0099 relates to the construction of 5 warehouse / logistics units, 3 own-office office buildings and a café / restaurant unit on a site at Calmount Road and Ballymount Avenue, Ballymount Industrial Estate, Dublin 12. The maximum heights of the proposed buildings is c. 17.09 metres and the total combined gross floor area (GFA) of the development is 22,393 sq.m (warehouse / logistics = 17,986 sq.m, own door office = 4,194 sq.m and café / restaurant = 213 sq.m) as revised in response to the CFI request.

The proposed development lies approximately 730m to the south of Irish Distillers at Robinhood Road, Fox & Geese, Clondalkin, Dublin 12.

Irish Distillers has been notified to the Health and Safety Authority as an establishment to which the provisions of SI No 209 of 2015 Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 apply.



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Regulation 24 of SI 209 of 2015 addresses technical advice on land-use planning and states:

*"The Central Competent Authority shall, on receiving a notification under Regulation 8, advise a planning authority of a consultation distance for that establishment, if it is within the planning authority's functional area or could affect its functional area, and the Central Competent Authority shall periodically review this advice and update it as necessary."*

The Consultation Distance is defined in the 2015 COMAH Regulations as:

*"a distance or area relating to an establishment, within which there are potentially significant consequences for human health or the environment from a major accident at the establishment, including potentially significant consequences for developments such as residential areas, buildings and areas of public use, recreational areas and major transport routes"*

The Clarification of Further Information request in respect of planning application reference SD22A/0099 states the following under Item 3(g):

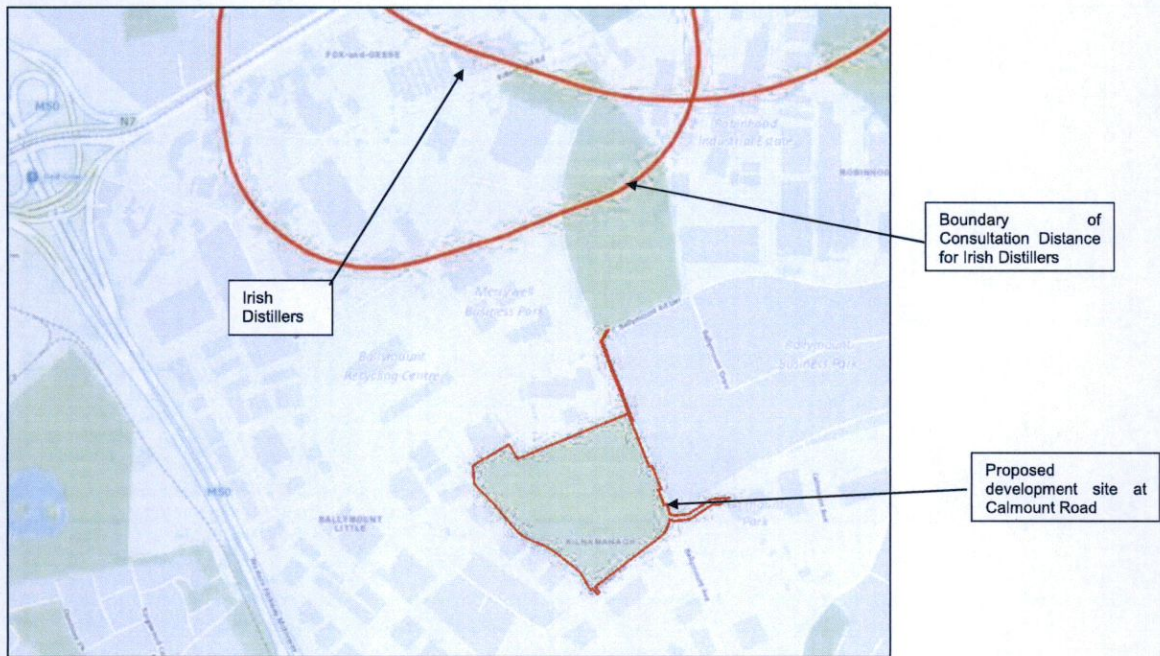
*"g. 12.9.8 Seveso Sites - the applicant is requested to submit details indicating compliance with this."*

We note that Section 12.9.8 of the Development Plan includes the following requirements in respect to new developments:

*"In assessing development proposals pertaining to or in the vicinity of SEVESO sites, the Planning Authority will consult and have regard to the technical advice of the Health and Safety Authority (HSA) in relation to proposed development and proposed land use(s). The HSA published revised guidance in 2021 titled Guidance on technical land-use planning advice for planning authorities and COMAH establishment operators. For some types of development, particularly those involving large numbers of people and vulnerable occupants, the Planning Authority will consider the societal risk (that is, the risk of large numbers of people being affected in a single accident)."*

Figure 1 below, illustrates the location of the proposed development site, the location of Irish Distillers and the Consultation Distance surrounding Irish Distillers.





It is concluded that the proposed development at Calmount Road is outside of the Consultation Distance surrounding the Irish Distillers COMAH establishment. There are no significant consequences for human health or the environment at the proposed development at Calmount Road given the separation distance to this Seveso site.

Yours faithfully,



Maeve McKenna  
Principal Risk Consultant  
AWN Consulting Ltd