

# Planning Report

## PROPOSED CEMETERY

On lands at Citywest Hotel and Convention Centre,  
Saggart, Co. Dublin.



December 2022

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Principal Planning Officer,  
Planning Department,  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24,  
D24 A3XC.

Friday, 9<sup>th</sup> December 2022  
[By Hand]

Dear Sir/Madam,

**RE: PERMISSION FOR A CEMETERY, RECEPTION/MANAGEMENT BUILDING AND ALL ANCILLARY WORKS AT CITYWEST HOTEL AND CONVENTION CENTRE, SAGGART, CO. DUBLIN.**

## **1.0 INTRODUCTION**

### **1.1 Application for Development**

Cape Wrath Hotel Unlimited Company <sup>1</sup> ("the Applicant") has retained Tom Phillips + Associates ("TPA"), Town Planning Consultants<sup>2</sup> in association with a multidisciplinary team to apply for planning permission for development on a site of c. 13.45 Ha. at the Citywest Hotel and Convention Centre, Saggart, Co. Dublin. The subject site relates to lands formerly used as an 18 hole golf course, in the Townland of Saggart.

The proposed development seeks to provide a cemetery with reception/management building within a landscaped parkland setting. The application includes the provision of a new access from Garters Lane to the N7 with 2 No. vehicular access points to serve the proposed cemetery.

### **1.2 Planning Report Outlines the Details of the Proposed Development**

The purpose of this *Planning Report* is to outline the background to and the substance of the subject proposal. It is intended to assist with the assessment of the application by providing an accessible summary of the content and context of the overall proposal and to give an insight into the rationale for the proposal and the overall design process undertaken.

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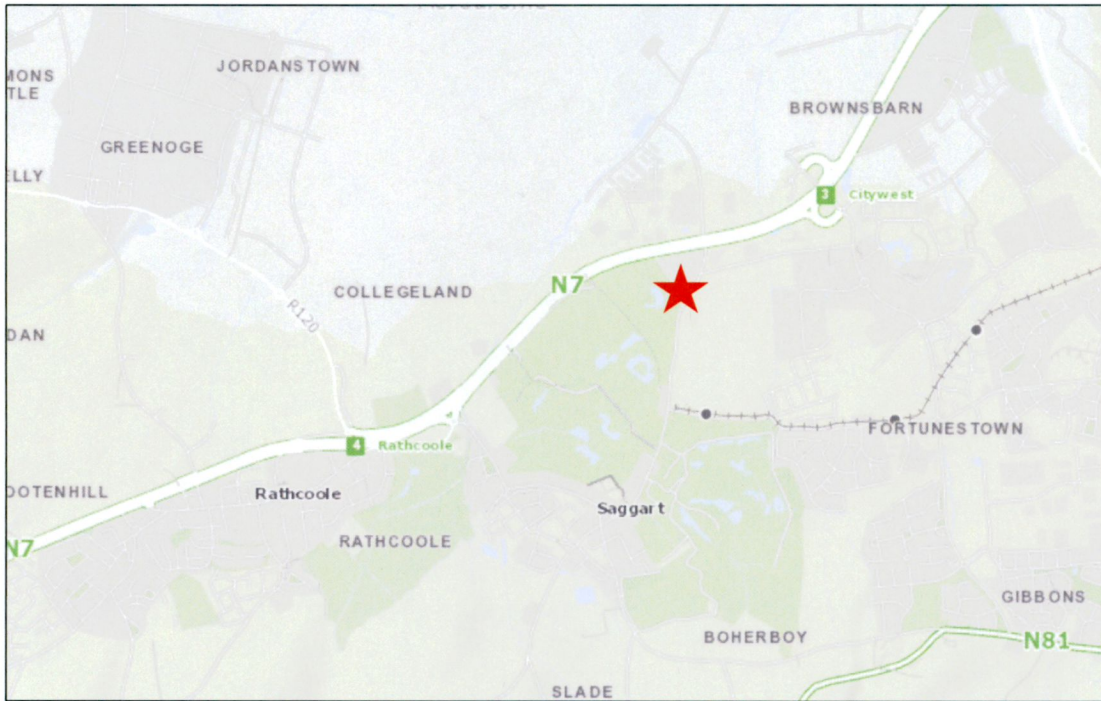


Figure 1.1: Location of Subject Site – Highlighted by Red Star (Source: [www.myplan.ie](http://www.myplan.ie) – Annotated by TPA, 2022).

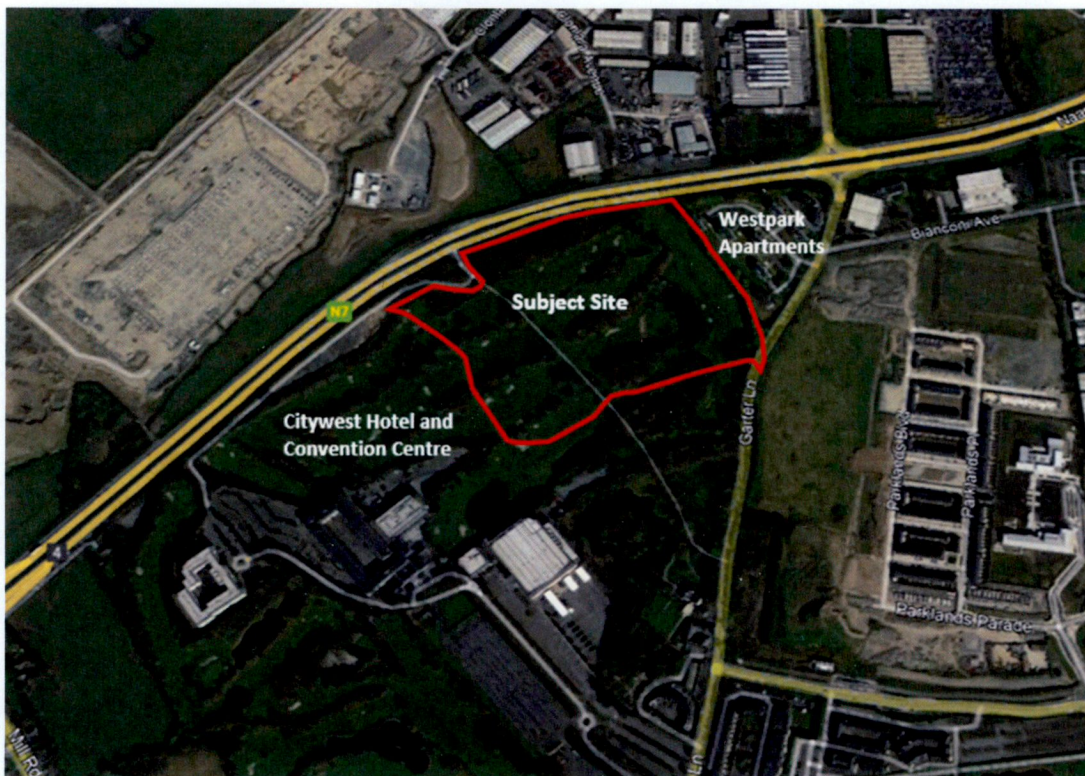


Figure 1.2 Subject Site indicatively outlined in red (Source: Google Earth, Cropped and annotated by TPA, December 2022)



### 1.3 Multi-Disciplinary Project Team

The Design/Planning Team comprises;

- Darmody Architecture<sup>3</sup>
- Murray & Associates, Landscape Architecture<sup>4</sup>
- Cronin & Sutton Consulting<sup>5</sup>
- Altemar, Marine and Environmental Consultants<sup>6</sup>
- Irish Archaeology Consultancy<sup>7</sup>
- Renaissance Engineering<sup>8</sup>
- Tom Phillips + Associates Town Planning Consultants

### 1.4 Pre-Planning Meeting with South Dublin County Council informed the Preparation of this Scheme

The Applicant met with Mr. Jim Johnson and Lawrence Colleran (SDCC) on the 30<sup>th</sup> September 2021 to discuss a proposal to provide a cemetery with reception building at the Citywest Hotel and Convention Centre. The subject application has been informed by feedback from this meeting, particularly with respect to landscape design proposals.

### 1.5 Rationale for Proposed Development

The rationale for the proposed development can be summarised as follows:

#### ***Increased Supply of Burial Grounds***

The proposed development will provide a significant quantum of burial plots serving the existing residential community within immediate proximity to the application site in Saggart, Rathcoole, and Fortunestown; and supporting the future residential communities on lands in the immediate environ of the site, zoned “to provide for new residential communities” (RES-N) under the *South Dublin County Development Plan 2022-2028* (“the Development Plan”) (Figure 5.1 refers).

#### ***Increase Range of Burial Typologies***

The proposed cemetery includes a range of burial types suitable for the existing and future residential community in South Dublin and beyond, including traditional burial and the use of granite marker posts, memorial plaques, including within Columbarium walls, supporting policy objective, **COS13 Obj. 1** of the Development Plan.

#### ***Open for All***

The proposed cemetery will cater for people of all beliefs. The non-denominational Reception building will provide appropriately designed facility adaptable to a range of burial typologies and associated services at the proposed cemetery.

#### ***Accessible Location for Large Population***

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<sup>3</sup> 27 91 Townsend Street, Dublin 2.

<sup>4</sup> 16 The Seapoint Building, 44-45 Clontarf Road, Dublin 3.

<sup>5</sup> 9 19-22 Dame Street, Dublin 2, D02 E267.

<sup>6</sup> Templecarrig Upper, Greystones, Co. Wicklow, Ireland.

<sup>7</sup> 30 Dalkey Park, Dalkey, Co. Dublin.

<sup>8</sup> 67-70 Meath Street, 2<sup>nd</sup> Floor, Dublin 8.



The site is located in immediate proximity to existing and emerging residential populations in the environs of the application site; located within 1km village (3-min. drive /10- min. walk/2-minute cycle time) to Saggart within 2km to Citywest Shopping Centre (3-min. drive time/20 min. walk/5 min. cycle time) and 3km to Rathcoole village (3-min. drive time/35 min. walk/10-min. cycle time).

The proposed development will serve new residential communities in permitted and part constructed residential development on lands within the *Fortunestown Local Area Plan 2012*, including those to the east of Garters Lane and Fortunestown Lane (ABP Ref. 300555-18) and at Coldown Commons (ABP Ref.: 310570-21) (Section 4.0 of this Planning Report refers.)

The application site is located within 750m to Saggart Luas Stop providing Red Line Luas services to the immediate environs of the application site.

The proposed development will also serve residential community in the wider county and beyond, in close proximity to the national road network, located within 1km to the N7 route.

#### ***Acceptable Impact on Local Road Network***

A Traffic Report has been prepared for the planning application, which reviews the accessibility of the site and assesses the impacts associated with the proposed development (Section 3.7 refers). The Report concludes that the proposed development will have “*no adverse traffic/transportation capacity or operational safety issues associated with the construction and operation of the Cemetery*”.

#### ***Provide a Suitable Site for a Cemetery***

It is submitted that the subject site constitutes an appropriate location for this use, located on lands which most recently have been utilised for golf course, maintaining the fairway character; and through the provision of significant additional tree planting /landscaping proposals, providing a well screened and attractive cemetery and reception building.

The application includes extensive tree planting providing additional screening to the N7 to the north, west and north-west and Westbrook apartments to the north-east. The application site is bound to the south by the grounds of Citywest Hotel and Convention centre including lands in use as a golf course. These uses remain compatible with the proposed cemetery.

The application includes the provision of new vehicular access road to the south of the cemetery from Garters Lane to the N7, with 2 No. access points from the proposed access road; and therefore, an appropriate vehicular access for the development. The location is therefore considered suitable for the proposed cemetery, having regard to vehicular and pedestrian linkages.

#### ***Designed to Integrate with Site Characteristics and Landscape***

The proposed development has been designed having regard to reflect the fairway character of the most recent golf course use, integrating with lands to the south. The proposed landscaping will provide screening to the N7, Garters Lane and Westbrook apartments to the north-east with retention of existing trees and the provision of significant supplemental tree planting.

The landscape design proposes a mix of Character Areas relating to the burial plot typologies, ecological as well as landscape character of the site (Section 3.0 of this Report refers).





***Compliant with the Site's Zoning Objective***

'Cemetery [if provided in the form of a lawn cemetery]' is a land use which is 'Open for Consideration' under the 'OS' zoning Objective in the Development Plan. It is considered that the proposed development is fully compliant with this zoning objective, supporting the provision of burial grounds in the County.



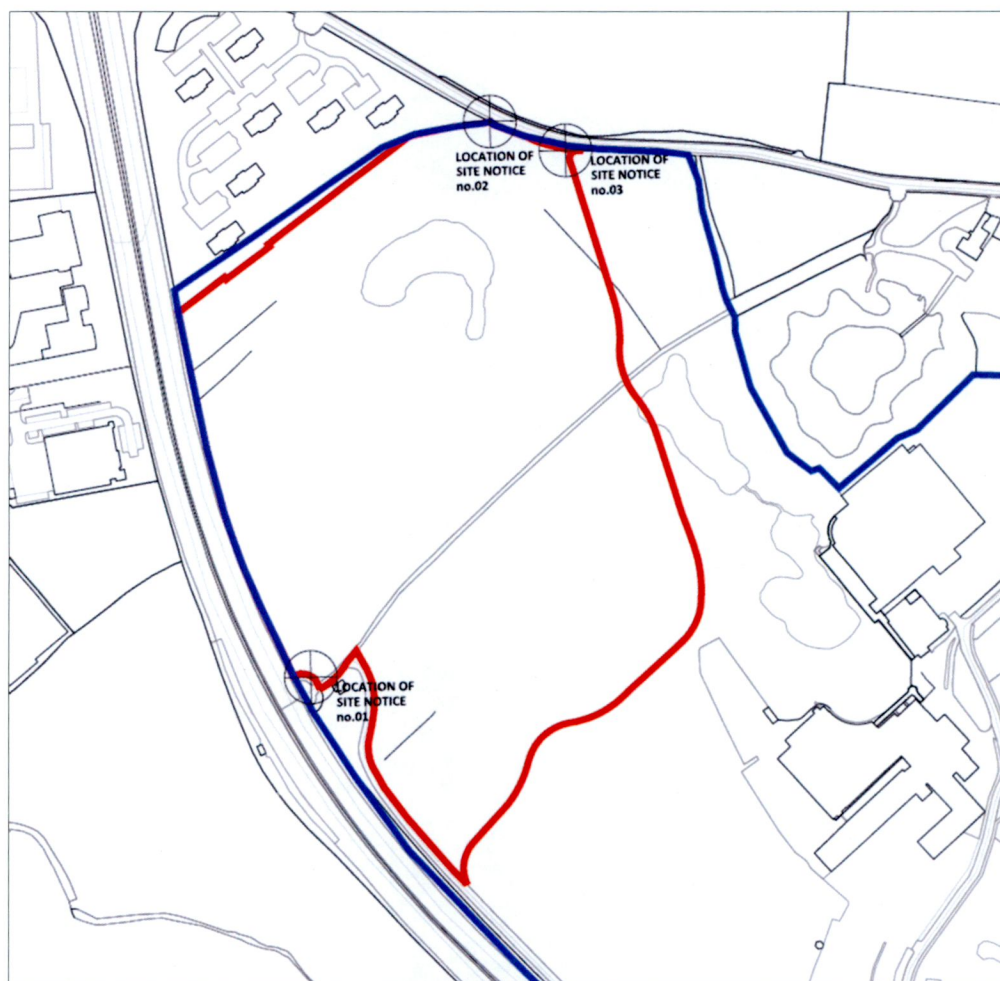
## 2.0 SITE LOCATION AND DESCRIPTION – CITYWEST HOTEL AND CONVENTION CENTRE, SAGGART, CO. DUBLIN

### 2.1 Site Location and Urban Context

The application site comprises a parcel of land of 13.45 Ha, on lands at Citywest Hotel and Convention Centre, Saggart, Co. Dublin. The wider area surrounding the site is characterised by a varied mix of uses including residential, retail, commercial and recreational uses.

The application site is located within the Townland of Saggart. The application site is bounded to the north-west by the N7 Naas Road beyond which lies land in agricultural use. To the north-east the site is bound by the Westpark apartment development. To the south-east, the site bounds Garters Lane beyond which existing and permitted residential uses predominate. Finally, the site is bound to the south-east and south-west, by the lands forming part of Citywest Hotel and Convention Centre.

There are no protected structures or proposed protected structures located within the application site.



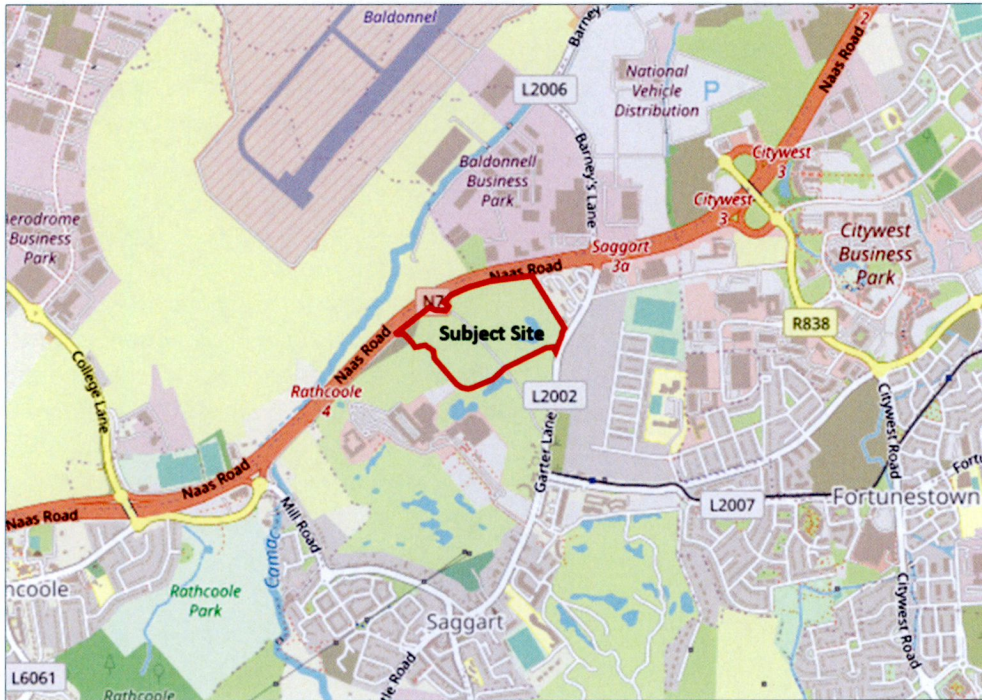
**Figure 2.1:** Extract from Site Location Map, Drawing No. PA-000, Darmody Architecture, December 2022, Cropped and annotated by TPA, December 2022.

The character of the subject site and wider environs has informed the design team in developing the masterplan for the development, taking account of the fairway character of



the subject lands, adjoining residential uses to the north, boundary with the N7 and Garters Lane to the north and east respectively.

The scale and form of the development has also been informed having regard to the extensive existing and future residential communities in the immediate and wider environs of the site. It is considered that the proposal therefore represents an appropriate development for this site.



**Figure 2.2:** Site Context. Indicative site boundary outlined in red. Source: [www. www.openstreetmap.org.com](http://www.openstreetmap.org.com); (Cropped and annotated by Tom Phillips + Associates, December 2022.)



### 3.0 PROPOSED SCHEME DETAILS AND OVERVIEW OF ENVIRONMENTAL ISSUES ARISING

#### 3.1 Description of Proposed Development (As Per the Statutory Notices)

*“Cape Wrath Hotel Unlimited intends to apply for permission for development on this site of 13.45 hectares at Citywest Hotel and Convention Centre, Saggart, Co. Dublin.*

*The development will consist of a cemetery including: 8,047 No. traditional burial plots; Columbarium walls; 1 No. single storey reception building (214.7m<sup>2</sup> Gross Floor Area (GFA)) comprising a reception, 1 No. office, 1 No. reception store, WC, kitchenette with photovoltaic (PV) solar panels at roof level; and the provision of an ancillary maintenance shed, bin and battery storage structures.*

*The development includes a new vehicular access road from Garters Lane to the N7/M7 Naas Road, with 2 No. vehicular access points serving the proposed cemetery; 110 No. car parking spaces (25 No. spaces to the east of the reception building and 85 No. within overflow car park areas to the south of the development); 8 No. bicycle parking stands; and all associated hard and soft landscape and boundary treatment works including the reshaping of an existing lake and provision of a footbridge; provision of SUDS measures, associated lighting, associated signage, site services (foul and surface water drainage and water supply); and all other associated site excavation, infrastructural and site development works above and below ground.”*

#### 3.2 Key Site Statistics

The principal details of the subject development are as follows:

<b>Site Area (Red Line Boundary)</b>	<b>134,500m<sup>2</sup> (13.45 Ha.)</b>
<b>Existing Buildings to be Demolished</b>	<b>c. 0 m<sup>2</sup></b>
<b>New Building Floor Area Proposed</b>	<b>c. 214.7 m<sup>2</sup></b>

<b>PROPOSED CEMETERY, CARRICKBRACK ROAD, HOWTH ESTATE</b>	
<b>Use</b>	<b>Proposed m<sup>2</sup></b>
Reception Building	c. 214.7 m <sup>2</sup>
Ancillary Bin Stores	c. 8.1 m <sup>2</sup>
Ancillary Maintenance Shed	c. 274 m <sup>2</sup>
<b>Total Gross Floor Area</b>	<b>c. 214.7 m<sup>2</sup></b>
Source: Tom Phillips + Associates from Darmody Architects Schedule of Accommodation.	

#### 3.3 Summary Design Proposal

The application includes comprehensive landscape design for the cemetery, prepared by Murray & Associates, Landscape Architecture, (Section 3.4 refers). Darmody Architects have designed the Reception Building (Section 3.5 refers).



### 3.4 Landscape Proposals



Figure 3.1: Excerpt from Site Layout Plan prepared by Murray & Associates. Cropped by TPA, December 2022.

The proposed cemetery has been designed in direct response to the site characteristics including the fairway character, gentle sloping nature of the site, preserving and enhancing the woodland planting, including groups of woodland copses.

The masterplan has been informed by adjoining use the N7 to the north-east, Westpark apartment development to the north-east and Garters Lane to the east, providing appropriate screening/boundary treatments, enhancing the visual amenities of the site.

The design concept seeks to conserve the woodland character, providing significant supplemental planting in the woodland areas; and redeveloping the former golf course fairway into a series of inter-connected “parkland” areas; providing supplemental planting throughout.

The layout has also been designed to provide views from the site; and creating a range of suitable memorial space areas. The layout comprises differing character areas within the various burial types (i.e., traditional burial and reflection spaces).

For further details on the proposed landscape proposals, please refer to the enclosed *Landscape Architect Report* prepared by Murray & Associates.



### Tree Survey

A comprehensive Tree Survey, and arboricultural assessment of the site has been undertaken by Murray & Associates, informing the overall design proposal for the proposed cemetery.

The Tree Survey confirms that site contains up to 1,000 specimens, of which c. 450 No. formed part of the survey. The survey confirms a wide mix of tree species, including Oak, Silver Beech. Ash trees on the site suffering from Ash dieback are to be removed.

The Report also includes a series of arboricultural impact / tree protection plans for the proposed development.

The Report concludes that,

*“The proposed development will retain the majority of the existing mature trees and woodlands on the site. The majority of the woodland areas on site would benefit from selective thinning and this would form part of the construction phase of the development.*

*New tree planting will increase the level of tree cover on the site . Overall the impact to the tree cover will be significantly positive.”*

For further details on the proposed landscape proposals, please refer to the enclosed *Arboricultural Report* prepared by Murray & Associates.

### 3.5 Reception Building

Darmody Architects have prepared a *Design Statement* of the proposed Reception building, located to the south-east of the site. The building includes a reception area for up to 60 No. seated guests, administrative office, kitchenette, toilets, ancillary stores with semi-external circulation spaces. The building and external areas are contemporary in design with the use of concrete and timber cladding.

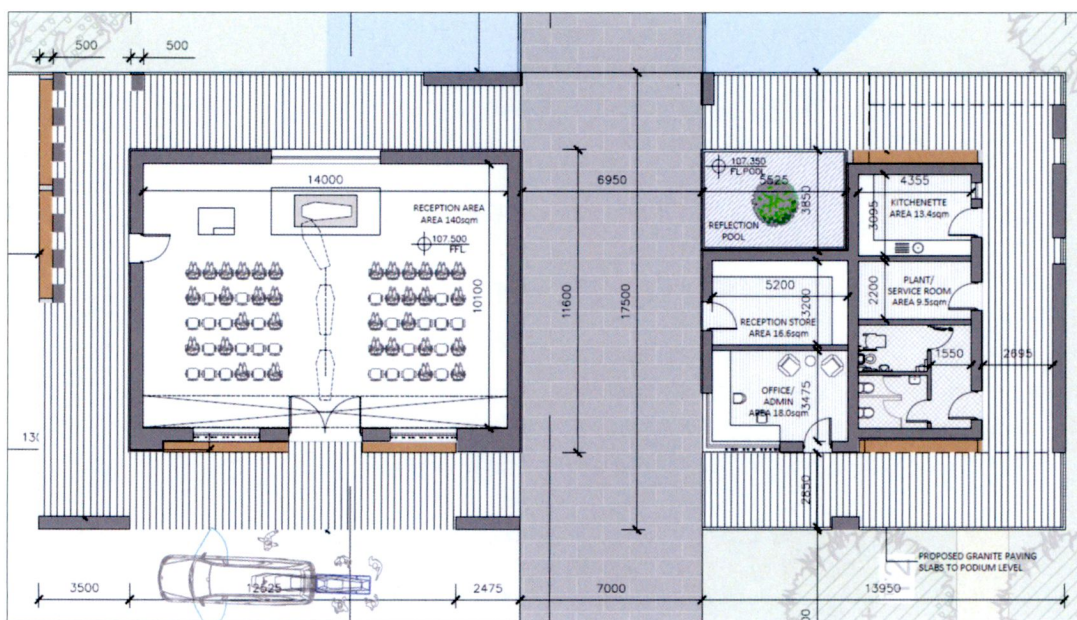
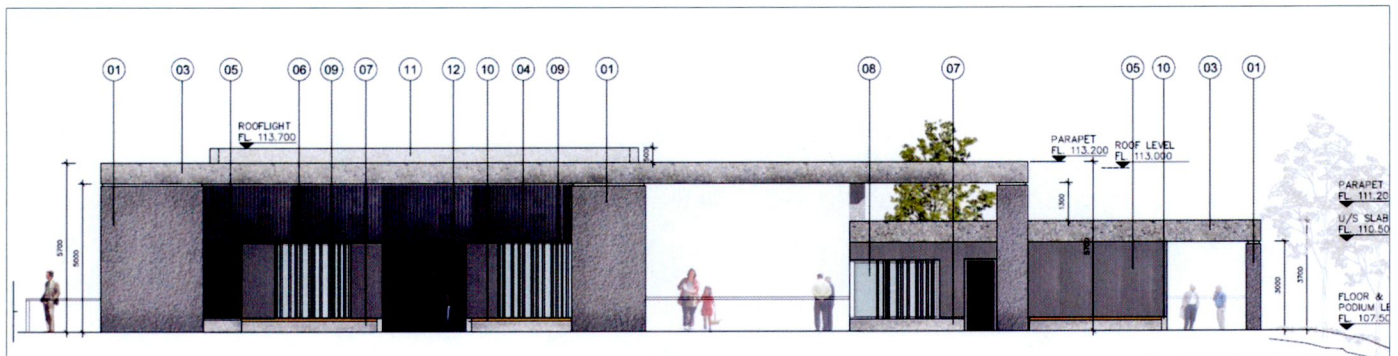


Figure 3.2: Excerpt from Reception Building South Elevation and Floor Plan, Darmody Architecture. Cropped by Tom Phillips + Associates, December 2022.



The external areas have been designed to accommodate a funeral cortege; as well as seating with views to the lake and wider environs, providing areas of reflection for visitors to the facility.



**Figure 3.3:** Proposed West Elevation, Darmody Architecture. Cropped by Tom Phillips + Associates, December 2022.



**Figure 3.4:** Excerpt from Proposed Reception Building Design Statement, Darmody Architecture. Cropped by Tom Phillips + Associates, October 2022.

It is considered that the location, scale, architectural design including choice of materials, will provide an appropriate well-designed reception building as part of this proposed cemetery serving the local and wider community in Saggart and environs.

### 3.6 Archaeological and Architectural Assessment

An Archaeological and Architectural Assessment has been prepared by Irish Archaeology Company (IAC), to assess the archaeological and architectural and historical context of the subject site and the potential impact of the proposed development on the character of the area.



This assessment concludes that no archaeological sites are located within the application site, or within 300m to the site; and that no archaeological investigations have taken place within the subject site (*Excavations Bulletin (1970–2022)*). The assessment concludes that

*No negative impacts are predicted on the archaeological resource as a result of the development going ahead. No archaeological mitigation is deemed to be necessary.*

The subject site is located within the former Saggart demesne (NIAH Garden Survey 2221), associated with Saggart House (RPS290), located within 300m to the south. Saggart House is considered to be;

*“well screened by dense tree cover and vegetation and is not visible from the site”*

The landscape is noted to have been in use as a golf course since 1995, and therefore no longer reflecting the former association with this demesne setting. The assessment concludes that,

*“No negative impacts predicted upon the architectural resource as a result of the development going ahead. Therefore, no architectural mitigation is deemed necessary”.*

It is considered that the proposed development will not negatively impact on the archaeological and architectural heritage of the subject site and immediate environs.

### **3.7 Traffic and Transportation**

A *Transportation Assessment Report* has been prepared by NRB Consulting Engineers. This report concludes that the construction and operation of all the proposed elements on the site, including the facility, will have a negligible impact upon the operation of the adjacent road network and in particular the adjacent N7. The report states that there are no traffic capacity or operation issues associated with the proposed development that would prevent a grant of planning permission by South Dublin County Council.

The Report sets out the rationale for the quantum car and bicycle parking standards which is considered appropriate for this proposal, as also discussed in Section 5 of this Report.

### **3.8 Engineering Services**

Surface water drainage has been designed in accordance with the *Greater Dublin Regional Code of Practice for Drainage Works*. The proposed cemetery will be served by, inter alia, a re-routed storm water main, with outfall to the proposed re-shaped lake, to the south-east of the proposed reception building.

The following SUDS systems have been employed:

- The use of a proposed reshaped lake, connecting to the natural watercourse, for attenuation purposes.
- Waterbutts for local irrigation and washing down areas.





- The use of an attenuation tank to limit surface water discharge during storm events.
- The provision of permeable for the main access road and reception building.
- The use of permeable paving to all carparking bays and footpaths, which will allow storm water to be gathered and drained on site.
- The use of porous material on all roads.

A section of an existing foul sewer traversing the site will be diverted to serve the proposed cemetery will be served through connecting to a section of an existing foul sewer traversing the site, (designed to Irish Water standards). The proposal will be served by a new potable water connection to the existing public watermain on Garters Lane system (designed to Irish Water standards).

Please refer to the *Engineering Services Report* prepared by Cronin & Sutton Consulting (CSC) which outlines the key elements proposed as part of the servicing regime of the proposed development.

### 3.9 Environmental and Hydrogeological Assessment

An environmental assessment including trial pit excavation, groundwater monitoring well drilling and installation, soil sampling, ground water sampling and laboratory analysis, with a total of 8 No. trial pits and 3 No. boreholes, was carried out for the subject site.

In summary, no physical evidence of contamination was observed and that the required min. 3.44m depth of overburden is present across the majority of the proposed burial area. The assessment confirms that both bedrock, deeper gravel and therefore groundwater will not be encountered by the proposed traditional burial works.

Finally, the assessment confirmed that no unacceptable risk with respect to potential contaminants at operational stage. Overall, the site investigation confirms that the site is suitable for use as a cemetery for traditional burials.

Please refer to the *Environmental & Hydrogeological Assessment Report for Proposed Cemetery Site*, prepared by Verdé Environmental Consultants Ltd for further information.

### 3.10 Flood Risk Assessment

Cronin & Sutton Consulting have undertaken a Site Specific Flood Risk Assessment (SSFRA) in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*, 2009. This includes the Sequential Approach to determine whether a particular development is appropriate for a specified location in terms of flood risk.

The assessment confirms that the site is located in flood zone C and concludes that '*the likelihood of onsite flooding from the hydrogeological ground conditions is deemed to be minor and within acceptable levels*'.

Please refer to the *Site Specific Flood Risk Assessment Report* prepared by Cronin & Sutton Consulting (CSC) for further information.

### 3.11 Ecological Impact

Altamar Marine & Ecological Consultancy have prepared an *Ecological Impact Assessment Report* and an *Appropriate Assessment Screening for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24* in respect of the subject development.

#### 3.11.1 No Significant Effects on Natura Sites Appropriate Assessment Not Required

Following an analysis of the proposed development and any potential relationships with European sites of significance, the *Appropriate Assessment Screening Report* concludes:

*'No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.'*

*'On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.'*

For further details, please refer to the enclosed *Appropriate Assessment Screening for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24* prepared by Altamar Marine & Ecological Consultancy.

#### 3.11.1 Mitigation Measures will Reduce Impacts on Local Ecology

*The Ecological Impact Assessment (EclA) for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24* undertaken by Altamar Marine & Ecological Consultancy in respect of the proposed development provides a summary of potential impacts and a series of mitigation measures to minimise the potential impact on the existing ecology.

The report concludes that,

*"The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on the sensitive receptors through the application the standard construction and operational phase controls. The overall impact on the ecology of the proposed development will result in a long term neutral-minor adverse not significant residual impact on the ecology of the area and locality overall. This is primarily as a result of the increased disturbance on site in contrast to the retention of the majority of sensitive habitats on site including the woodland and pond, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategy."*





For further details, please refer to the enclosed *The Ecological Impact Assessment (EclA) for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24* prepared by Altemar Ecological Consultants.

### **3.12 Screening for Environmental Impact Assessment: No EIAR Required**

Part 2 of Schedule 5 of the Regulations sets out developments which, if exceeding a certain size or other criteria, must undergo Environmental Impact Assessment.

Section 10 'Infrastructure Projects' includes the following type of development:

*'(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.'*

The proposed development, a cemetery with reception building on a site of 13.45 hectares, does not meet or exceed the 20 hectare threshold, which is considered relevant to this site.

This EIA Screening Assessment confirms that the proposed development does not exceed a threshold specified in Part 1 of Schedule 5 of the Regulations, which requires the mandatory preparation of an EIA. The project is a sub-threshold development, i.e., is of a class specified in Part 2 of Schedule 5 of the Regulations, but does equal or exceed the relevant quantity, area or other limit specified in that Class.

The screening assessment, therefore, concludes that the works, individually and cumulatively, would not give rise to any significant effects on the environment, which would require the preparation of an EIA, pursuant to Schedule 7 of the Regulations.

#### 4.0 RELEVANT PLANNING HISTORY

Tom Phillips + Associates carried out a search of the online search facilities of South Dublin County Council, and An Bord Pleanála, in order to establish the planning history of the subject site, and relevant planning history in the environs of the application site.

The parent permission for the golf course on site and wider golf and hotel complex was granted by South Dublin County Council in 1995 (Reg. Ref. S94A/0328).

There have been numerous planning applications relating to the overall complex since this parent permission. These planning applications have related to extensions and modifications to the hotel, residential and conference centre applications and wider amendments to car parking and landscaping in areas surrounding the hotel and conference centre.

In the context of the current application and the current subject site an application was made in April 2021 for the development of a community sports and civic campus (Reg. Ref. SD21A/0088). This application was subsequently declared withdrawn in February 2022.

A further 3 No. planning files were identified on SDCC's planning search database which included the current site area within their respective application boundaries.

An application related to the construction of a bottle store building to the north of the hotel building (at the south of the current site) which was permitted in October 2004 (SD03A/0400). Two further permissions have been granted for a hotel extension (Reg. Ref. SD02A/0722; ABP Ref. 202708) and an aparthotel (Reg. Ref. S01A/0450). Both applications relate to areas to the south of the application site.

#### **Residential Development on lands within *Fortunestown Local Area Plan (LAP) 2017, as extended.***

Citywest Hotel and Convention Centre is located to the west of the Fortunestown LAP lands (82ha). Permission for a residential development, to the west of the application site, including the following:

#### **Parklands, Fortunestown Lane and Garters Lane (ABP Ref. 300555-18)**

Planning permission for a Strategic Housing Development (SHD) was granted in March 2018 for providing 524 No. residential units, parks, vehicular access and pedestrian links. The site is located to the west of the application site to the west of Garters Lane; and is partly constructed. The duration of this permission was subsequently extended for a period of 3 years to 30 June 2026 (SHD3ABP-300555-18-EP).

#### **Fortunestown Lane and Garters Lane (ABP Ref. 305563-19)**

Planning permission was granted in February 2020 for an SHD providing 118 No. apartments on a site to the west of Garters Lane and north of Fortunestown Lane including Saggart Luas Stop; and to the south of Parklands.

#### **Cúil Dúin, Cooldown Common, Fortunestown Lane (Reg. Ref.: SD15A/0095; SD14A/0121)**

Planning permission was granted in August 2015 for amendments to house types of a permission for 224 No. residential units, to the north of Fortunestown Lane.

#### **Cooldown Commons (Phase 3), Fortunestown Lane (ABP Ref. 302398-18)**





Planning permission was granted in October 2018 for an SHD providing 459 No. units on a site to the west of Carrig Court and to the north of Fortunestown Lane including Saggart Luas Stop; and to the south of Parklands.

Permission was subsequently granted to amend this permission, replacing 32 No. duplex units with open space. The overall permission therefore provides for 423 No. units (ABP Ref.: 310570-21 refers).

**Cooldown Commons and Fortunestown (SDCC Reg. Ref.: SD22A/0133; ABP Ref.: 310570-21)**

Planning permission was granted in August 2022 by SDCC to amend a permission for a SHD, providing 405 No. residential units, public and communal open spaces/plazas, pedestrian and cyclist routes including a pedestrian bridge.

These permissions demonstrate the scale of new residential community emerging in the immediate catchment of the subject site, which will be served by the proposed cemetery and reception/management building.

## 5.0 KEY DEVELOPMENT MANAGEMENT ISSUES

### 5.1 Overview

The planning context of the subject site is governed by National and Regional Plans, the *South Dublin County Development Plan 2022-2028*. The *Development Plan* is informed by National Guidelines and Regional Guidelines, as referenced in Section 5.3 below.

### 5.2 National Planning Guidance

#### 5.2.1 *National Planning Framework, Project Ireland 2040*

The National Planning Framework (NPF) is the Government's high level strategic plan for shaping the future growth and development of Ireland to the year 2040 and to guide public and private investment and promote opportunities in villages and cities around the country.

National Policy Objective (NPO) 5 states;

*"Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."*

NPO 11 states;

*"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

The construction and operational phases of the proposed cemetery has the potential to generate significant direct and indirect employment and economic activity in Howth and wider environs, supporting the national policy objectives outlined above.

Moreover, the development of a cemetery at this location is considered to represent an efficient use of lands at this location; providing green infrastructure, and supporting ecological biodiversity.

### 5.3 Regional Planning Guidance

#### 5.3.1 *Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*

The Regional Spatial & Economic Strategy (RSES) has been published by the Eastern and Midland Regional Assembly and covers nine counties including twelve local authorities. The purpose of the Strategy is to support the implementation of Project Ireland 2040 through providing a long-term strategic planning and economic framework for the development of the Regions.

Section 3.2 of the Strategy seeks to;





*“increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes . . . ”*

Regional Policy Objective (RPO) 4.3 supports the consolidation and re-intensification of infill / brownfield sites;

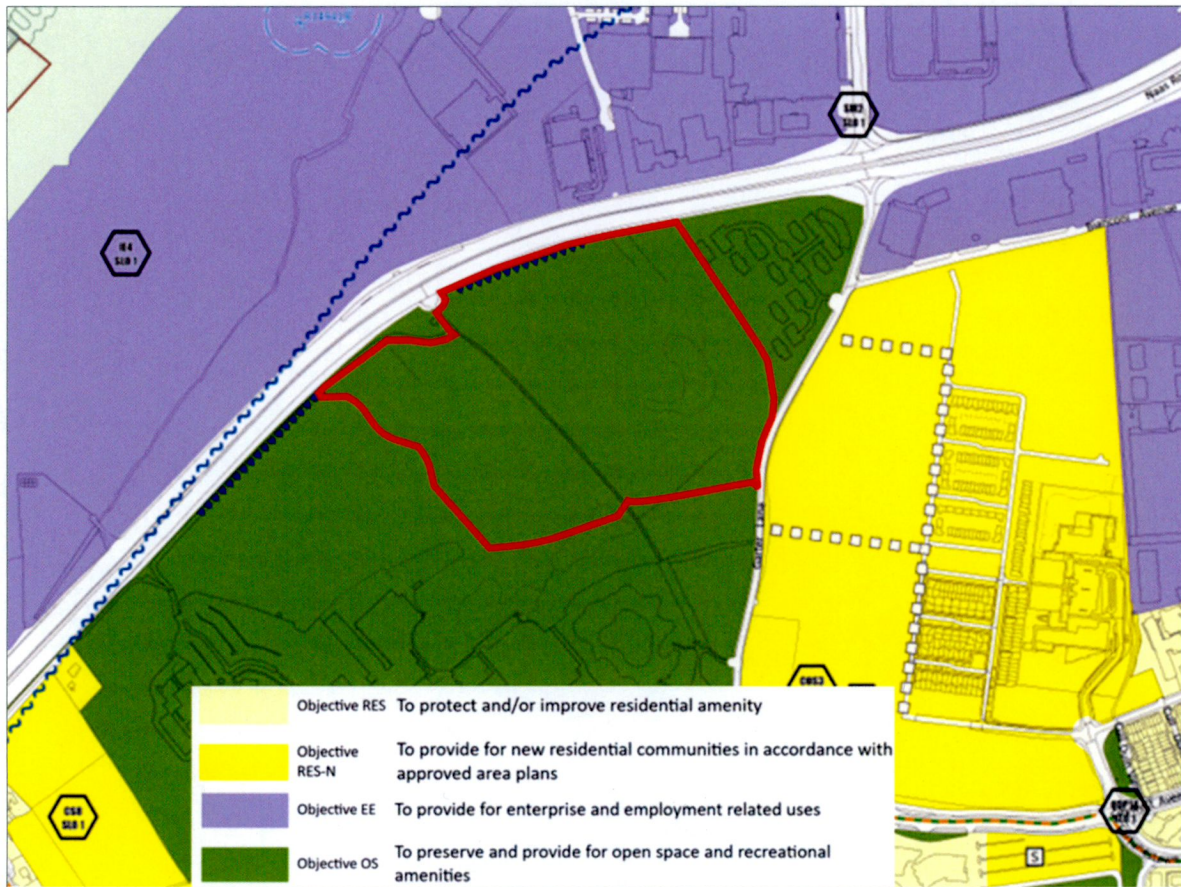
*“to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

In this context, the proposed cemetery will provide a burial ground with reception building to serve the existing and future populations within the immediate environs of the proposed cemetery use, served by high frequency public transport services including from Saggart Luas Station, within 1km of the site (Section 3.7 refers).

## 5.4 Applicable Planning Policy – South Dublin County Development Plan 2022-2028

### 5.4.1 Land Use Zoning – Open Space Zoning Applies

The application site is subject to ‘Open Space (OS), “to preserve and provide for open space and recreational amenities”, as per Figure 5.1.



**Figure 5.1:** SDCC Zoning Designation – Indicative Outline of Subject Site in Red, South Dublin County Development Plan 2022-2028 Zoning Map, (Cropped and Annotated by TPA, December 2022)

‘Cemetery [if provided in the form of a lawn cemetery]’ is a use which is Open for Consideration under this zoning objective.

The application relates to the provision of a cemetery on lands formerly used as a golf course, and in the form of burial areas in the former fairways, akin to a lawn cemetery, and therefore meeting these criteria for the provision of a cemetery on lands subject to OS zoning objective.

The Development Plan sets out that Open for Consideration uses, “may be acceptable to the planning authority subject to detailed assessment against the principles of proper planning and sustainable development and the relevant policies, objectives and standards set out in this Plan.”





## Development Plan Policies

RELEVANT POLICIES FOR PROPOSED BURIAL GROUNDS / CEMETERY	
<b>Policy COS13 Burial Grounds</b>	Facilitate the sustainable development of cemeteries and crematoria to cater for the needs of the County.
<b>COS13 Objective 1</b>	To facilitate the development of new or extended burial grounds, including green cemeteries, eco-burial grounds, and crematoria, having consideration for the burial preferences of multi-faith and non-religious communities, at suitable locations in the County, subject to appropriate safeguards with regard to environmental considerations, noise and traffic impacts.

The proposed development will support the delivery of cemetery facility for the residential community within immediate proximity to the development, as well as in the wider hinterland region of South Dublin. The proposal will provide significant quantum of burial plots and typologies suiting multi-faith and non-religious communities. The proposed Reception building will provide an appropriate form and scale of building for services within the facility, designed as a non-denominational building.

The Development Plan notes the following (Section 12.8.8 refers):

*‘Development proposals for new or extended cemeteries and / or crematoria, including green burial grounds will be considered in suitable locations with compatible land use zoning objectives. The applicant will be required to demonstrate a need for the development and that the proposal will not adversely impact on the amenity of adjacent existing residents or businesses, or disproportionately cause inconvenience by way of significant traffic congestion or car parking issues.*

*All proposals pertaining to cemeteries, crematoria or green burial grounds should demonstrate compliance with appropriate legislative guidelines and provide details in relation to landscaping, storage, waste and groundwater. Hydrogeological surveys and monitoring of the groundwater may be required for cemeteries. Cemeteries are part of the green infrastructure of the County and any proposals for new or extended burial grounds should incorporate planting of native and pollinator species.’*

The proposed cemetery use is located on lands, as noted above which have most recently been used as part of a golf course. The immediate adjoining uses with N7 Naas Road to the north-west, Garters Lane to the east, and grounds of the Citywest Convention Centre to the south-east and are considered fully compatible with the subject development proposal.

The proposed development comprises traditional burials within the former fairways throughout the site, with reception building located to the east of the site from Garters Lane.

The proposed use of an access from Garters Lane, will minimise the requirement for additional development works, reducing potential visual impact and ensuring safe vehicular and pedestrian access for the development.



The proposed development has been designed to provide a parkland function, with extensive landscaping including tree planting throughout. Additional tree planting on the north-eastern periphery will provide further screening at this boundary.

The proposed development will serve the existing and future residential populations in the immediate and wider environs of the application site, served by high frequency Luas services from Saggart Luas Station; Dublin Bus services, (No. 69). The site is also within 1km and 3km to Saggart and Rathcoole villages, and well as wider rural community in the County and beyond.

The cemetery will be managed /maintained, by a third party operator. The overall proposal, including comprehensive landscape masterplan ensures that the cemetery will operate in a managed framework, and refer the Council to appended Operational Statement document, prepared by Murray & Associates.

The proposed development has been informed by detailed environmental assessment, with respect to hydrogeology, archaeology, ecology, flood risk, traffic and transportation and services.

It is submitted that the considered design of the proposal constitutes a positive facility for South Dublin County, with positive improvements to landscape, visual, ecological amenities of this site, in accordance with the *Development Plan*.

Finally, the proposed development will continue to protect and enhance the Open Space zoning objective and is thus fully in accordance with the *Development Plan* objectives pertaining to the site.

#### 5.4 Protected Structures

There are no protected structures, as identified in the Development Plan, located on the subject site. The following protected structures are within the wider environs of the site. (*Site Layout Plan*, prepared by Murray & Associates (Dwg No. 1872\_PL\_P\_01) refers).

Environs of Citywest Hotel and Convention Centre			
RPS Ref.	Townland	Location	Description of Protected Structure
290	Saggart	Saggart House	House & Gateway
292	Saggart	Tassagart	Tower House, Walled Stable Yard, Outbuildings, Gateways (RM)
422	Saggart	Garters Lane	Range of rubble stone outbuildings, c.1820

**Source:** Tom Phillips + Associates, 2022, derived from Appendix 3A of the *Development Plan*.



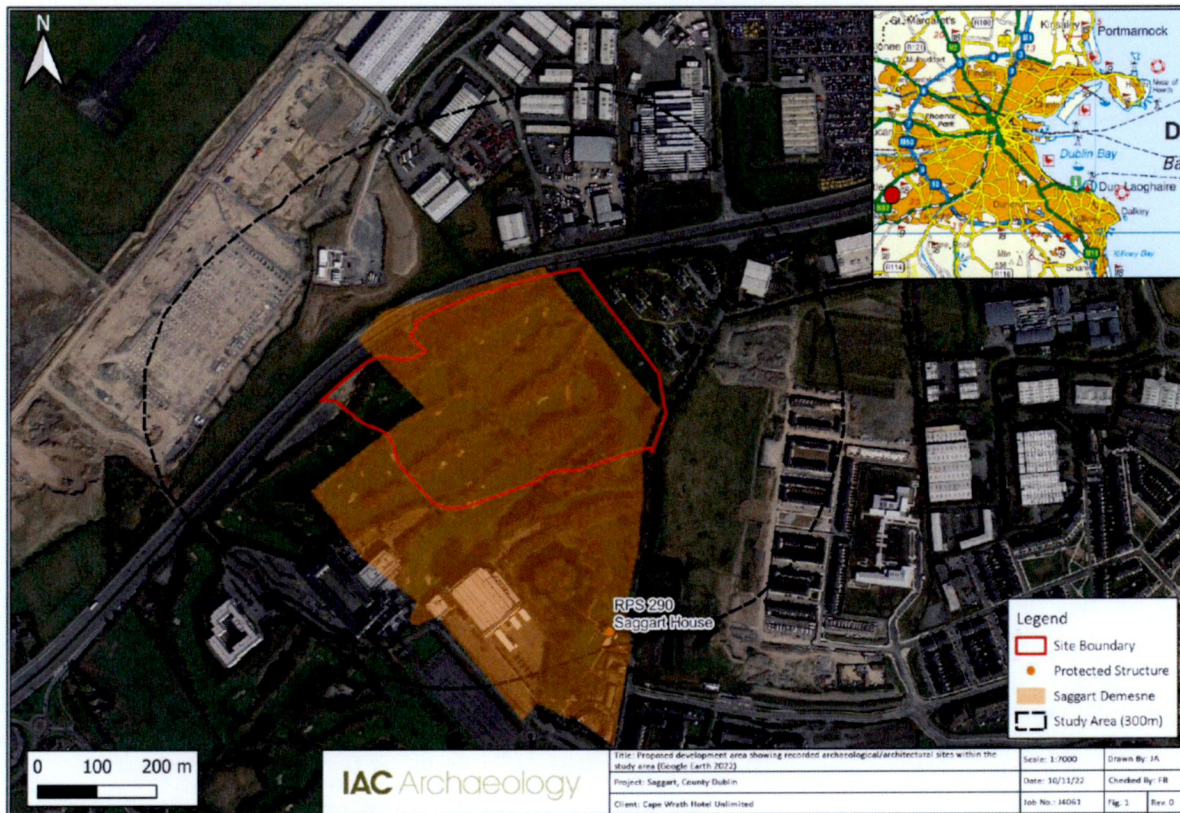


Figure 5.2: Site Location Showing Archaeological and Architectural Context (Source: IAC Report, December 2022)

### 5.5 Recorded Archaeological Sites

There are no recorded archaeological sites within the site and the closest located c.381m to the north-west of the application site, consisting of a burnt mound (DUO21-099). This archaeological site is not a protected as a National Monument or subject to Preservation Orders (Figure 5.3 refers).

### 5.6 Significant Views

A portion of the application site bounding the N7 is subject to land use zoning objective which seeks *“To protect and preserve Significant Views”*, (Figure 5.1 refers).

The proposed cemetery has been designed with full regard to these views towards the application site from the N7, through the provision of additional screened planting; and of a landscape design for the burial areas, reflecting the fairway character with extensive planting throughout the site.

The proposed reception building and associated access road to the south of the site, with access from Garters Lane to the south of the site, are at a location and scale to further ensure that the Significant Views are not negatively impacted by the proposed development.

It is considered that the scale of the development will not negatively impact on these views, and that the overall proposal will positively impact on the visual amenities of the site and environs.





5.7 Car Parking Standards

The *Development Plan* does not provide car parking standards applicable to the proposed cemetery and reception building. In this context the parking rate for ‘Place of Worship’ has been applied.

Car Parking Provision				
Use		SDCC Rate	SDCC Requirement	Proposed
Place of Worship	of	1 per 6 seats	10	110. 25 to east of Reception building; 85 No. within overflow car park.

**Source:** Tom Phillips + Associates, 2022, derived from Table 12.25 of the *Development Plan*.

It is submitted that the proposed car parking provision will cater appropriately for the proposed development.

We refer to the *Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared NRB Consulting Engineers in this regard.

5.8 Bicycle Parking

The *Development Plan* does not provide bicycle parking standards applicable to the proposed cemetery and reception building. In this context the parking rate for ‘Place of Worship’ has been applied.

Bicycle Parking Provision				
Use		SDCC Rate	SDCC Requirement	Proposed
Place of Worship	of	1 per 10 seats	6	16

**Source:** Tom Phillips + Associates, 2022, derived from Table 12.25 of the *Development Plan*.

The proposed development includes 8 No. bicycle parking stands (16 No. bicycle parking spaces). It is submitted that this is an appropriate quantum of bicycle parking to serve the proposed development.

We refer to the *Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared NRB Consulting Engineers in this regard.

5.9 Flood Risk

A Site Specific Flood Risk Assessment was carried out by CS Consulting Group. The report concludes as follows;

***“Fluvial Flood Risk***

*“Mapping of predicted tidal, and fluvial flooding extents shows that these will not affect the development site.”*





*Pluvial Flood Risk*

*“Pluvial flooding is indicated on site due to the presence of an existing pond, used as a water feature. This pond is to be re-engineered and retained. All pluvial waters will be contained within this pond.”*

*Flood Risk from Ground Water*

*“The proposed development’s surface water drainage network shall infiltrate to ground within the site boundary of the site and incorporates attenuation storage to cater for a 1-in-100-year storm event, plus a 20% allowance for climate change effects. The proposed development is therefore not considered to increase the site’s potential to contribute to off-site flooding.*

*The proposed development shall not discharge any stormwater to the public drainage network and therefore shall not have any adverse effect on its operation.”*

5.10 Conclusion – Proposal is Compliant with Development Plan

In summary, having regard to policies and standards prescribed at local levels, it is considered that the proposed development complies with relevant policy and guidance and can be considered to contribute positively to the proper planning and sustainable development of the area.



## 6.0 DOCUMENTS SUBMITTED AS PART OF THIS APPLICATION

The documentation outlined in the following Sections forms part, and is in support of, the subject Planning Application;

- An original page of the *Irish Daily Star* dated Saturday, 3<sup>rd</sup> December 2022, in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2001-2022*, (“the Regulations”).
- One copy of the Site Notice dated Monday, 5<sup>th</sup> December 2022 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the Regulations.
- A duly completed South Dublin County Council *Planning Application Form*, signed and dated Friday, 9<sup>th</sup> December 2022.
- Six copies of this *Planning Report*, prepared by Tom Phillips + Associates, and dated Friday, 9<sup>th</sup> 2022.
- Six copies of an *Appropriate Assessment Screening for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24* prepared by Altemar Ltd.
- Six copies of *The Ecological Impact Assessment (EclA) for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24*, prepared by Altemar Ltd.
- Six copies of an *Environmental & Hydrogeological Assessment Report for Proposed Cemetery Site*, prepared by Verdé Environmental Consultants.
- Six copies of an *Archaeological Assessment at Saggart, Co. Dublin*, by Irish Archaeological Company.
- Six copies of the *Citywest Cemetery Landscape Architects Report* and the *Citywest Cemetery Arboricultural Report*, prepared by Murray & Associates, Landscape Architecture.
- Six copies of the *Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared by NRB Consulting Engineers.
- Six copies of the *Engineering Services Report, Proposed Development at City West, Saggart, Co. Dublin* prepared by Cronin Sutton Consulting.
- Six copies of the *Site-Specific Flood Risk Assessment, Proposed Development at City West, Saggart, Co. Dublin* prepared by Cronin Sutton Consulting.
- Six copies of the *Resource and Waste Management Plan for Construction, Proposed Development at City West, Saggart, Co. Dublin*, prepared by Cronin Sutton Consulting.
- Six copies of the *Outline Construction and Environmental Management Plan for Construction, Proposed Development at City West, Saggart, Co. Dublin*, prepared by Cronin Sutton Consulting.





- Six copies of the *External Lighting Report for Citywest Cemetery* and prepared by Renaissance Engineering and the following details:
  - Parking Areas and Building
  - *ALD22180 Exterior Lighting Schedule Citywest Cemetery.*
  - Six copies of the PV specification by Crest Pro Power.
  
- Six copies of the following drawings, prepared by Darmody Architecture:

Dwg Ref	Title	Scale	Size
PA-000	Site Location Map – Entire Ownership	1:2500	A0
PA-001-1	Site Location Map – Subject Site (Parcel 1)	1:1000	A0
PA-001-2	Site Location Map – Subject Site (Parcel 2)	1:1000	A0
PA-001-3	Site Location Map – Subject Site (Parcel 3)	1:1000	A0
PA-001-4	Site Location Map – Subject Site (Parcel 4)	1:1000	A0
PA-100	Proposed Reception Building South Elevation & Floor Plan	1:200	A3
PA-101	Proposed Reception Building Roof Plan	1:200	A3
PA-102	Maintenance Shed Floor Plan, Elevations & Section AA	1:200	A3
PA-300	Proposed Reception Building Elevations, Section A-A & Section B-B	1:200	A3
PA-301	Maintenance Shed Floor Plan, Elevations & Section AA	1:200	A3
PA-400	Proposed Reception Building – Rendered Elevation & Proposed Materials	NTS	A3
PA-500	Proposed Bin Store	1:200	A3

- Six copies of the following drawings prepared by Murray & Associates, Landscape Architecture:

Dwg Ref	Title	Scale	Size
1872_PL_P_00	Site Layout - Wider Context - Overall	1:1000	A0
1872_PL_P_00.1	Site Layout - Area A	1:500	A0
1872_PL_P_00.2	Site Layout - Area B	1:500	A0
1872_PL_P_00.3	Site Layout - Area C	1:500	A0
1872_PL_P_00.4	Site Layout - Area D	1:500	A0
1872_PL_P_01	Site Layout Plan - Focussed View	1:500	A0
1872_PL_P_01.1	Detail Plan - Ceremony Building	1:200	A1
1872_PL_P_01.2	Detail Plan - Car Parking 1	1:200	A1
1872_PL_P_01.3	Detail Plan - Car Parking 2	1:200	A1
1872_PL_P_01.4	Detail Plan - Aquatic Planting	1:200	A1
1872_PL_P_02	Proposed Boundary Treatment	1:500	A0
1872_PL_S_01	Landscape Sections 1	1:200	A0
1872_PL_S_02	Landscape Sections 2	1:200	A0
1872_PL_S_03	Landscape Sections 3	1:200	A0
1872_PL_E_01	Contiguous Elevation 1	1:200	A0
1872_PL_E_02	Contiguous Elevation 2	1:200	A0
1872_PL_E_03	Contiguous Elevation 3	1:200	A0



1872_PL_D_01	Landscape Details	As Shown	A1
1872_PL_TS_P_01	Tree Survey	1:1000	A1
1872_PL_TS_P_02	Tree Impact Plan	1:1000	A1

- Six copies of the following drawings, prepared by Cronin & Sutton Consulting Engineering:

Dwg Ref	Title	Scale	Size
CTW-CSC-ZZ-XX-DR-C-0100	Topographical Survey	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0003	Road Layout	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0004	Sightlines	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0005	Road Profile	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0006	Swept Path Analysis	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0007	Proposed Drainage Layout Sheet 1	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0008	Proposed Drainage Layout Sheet 1	1:500	A0
CTW -CSC-ZZ-XX-DR-C-0009	Proposed Watermain Layout	1:500	A0
CTW -CSC-ZZ-XX-DR-C-00010	Typical Details	1:500	A0

- Six copies of the following drawings, prepared by Renaissance Consulting Engineering:

Dwg Ref	Title	Scale	Size
22298-REN-XX-SS-DR-E-6300	Lighting Services Site	1:500	A1

### 6.1 Planning Fee

An EFT has been paid to South Dublin County Council on 23<sup>rd</sup> December 2022 in the amount of **€1,445.42**, in accordance with the provisions of Schedule 9 of the Regulations. This has been confirmed in advance of lodgement with South Dublin County Council (22<sup>nd</sup> December 2022).

The fee is calculated this as follows:

Class of Development	Amount of Fee	Proposed Development	Calculation
<b>Class 4:</b> The provision of buildings other than buildings coming within class 1, 2 or 3.	€80 for each building, or €3.60 for each square metre of gross floor space to be provided, whichever is the greater.	214.7 m <sup>2</sup>	<b>€772.92</b> <b>(214.7 x €3.60)</b>
<b>Class 12:</b> The use of land as a burial ground.	€200, or €50 for each hectare of site area, whichever is the greater.	Burial Ground Use	<b>€672.50</b> <b>(13.45 x €50.00)</b>
<b>Total Fee Payable</b>			<b>€1,445.42</b>
<b>Source:</b> Tom Phillips + Associates; based on Schedule 9 of the Regulations.			





## 7.0 CONCLUSION

In summary, it is considered that the proposed development will provide a well-designed Reception building and landscaped cemetery, at an appropriate location and scale, significantly enhancing the visual, ecological amenities of the site.

The proposal complies in full with the *South Dublin County Development Plan 2022-2028*, supporting the delivery of burial grounds in the county, serving the existing and growing residential community in the environs of Citywest Hotel and Convention Centre.

The proposed development is in accordance with the proper planning and sustainable development of the area. We trust you find this application in order. Please do not hesitate to contact the undersigned should you require any further information on the proposal.

Yours faithfully,

---

**Aoife McCarthy**  
**Associate**  
**Tom Phillips + Associates**

