

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

Friday, 13th January 2023
[By Courier.]

RESPONSE TO REQUEST FOR FURTHER INFORMATION
South Dublin County Council Reg. Ref. SD22A/0418
Requested Date: 9th January 2023

Dear Sir/ Madam

RE: PROPOSED MODIFICATIONS TO SELF-STORAGE FACILITY AND GROUND FLOOR CAFÉ PERMITTED UNDER (REG. REF. SD21A/0284) ONE A SITE OF 0.72 HA AT LIFFEY VALLEY, DUBLIN 22.

1.0 INTRODUCTION

1.1 Response to a *Request for Further Information*

The Applicant, Oceanglade Ltd.¹ has retained Tom Phillips + Associates² in conjunction with Carew Kelly Architects, GDaly Consulting and ARUP to submit this Response to a *Request for Further Information* in relation to the aforementioned development at Liffey Valley, Dublin 22 to the south of the N4, to the west of the existing Johnson and Johnson office building, to the north and east of Giraffe Childcare and to the north of Liffey Valley secondary estate road. (Figure 1.1, below).

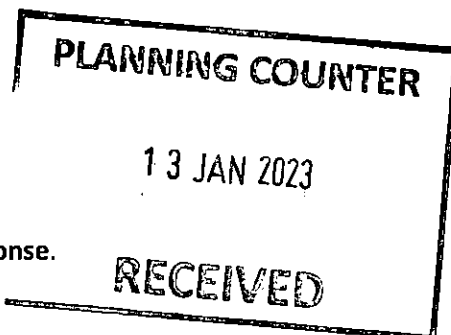
We attach at Appendix A South Dublin County Council's *Request for Further Information* in respect of Reg. Ref. SD22A/0418, dated 9th January 2023.

Six copies of this RFI Response/Cover Letter along with associated accompanying submitted for the Local Authority's assessment.

1.2 Format of this Response

This Report is formatted as follows:

Section 1 sets out the introduction and context of the RFI Response.



¹ Unit 1 North Park, North Road, Finglas, Dublin 11.

² 80 Harcourt Street, Dublin 2, D02 F449.



Section 2 sets out a summary of the **Applicant's response** to RFI.

Section 3 concludes the RFI Response outlining how the proposed development continues to be compliant with the *South Dublin County Development Plan 2022 – 2028*.

1.3 Checklist of Documentation Enclosed

Six copies of the following documentation are provided with the 'Further Information' response:

- **Response to a Request for Further Information**, prepared by Tom Phillips + Associates, Town Planning Consultants, dated 13th January 2023 (this document).
- The following drawings accompanies this Response:

Carew Kelly Architects				
Drawing No.	Title	Scale	Size	Rev.
20-04/225	Proposed Landscape Plan	1:500	A1	-
20-04/226	Proposed Green Space Factor Calculations	1:500	A1	-
20-04/227	Revised Eastern Road Access Layout	1:200	A3	-
20-04/228	Revised Roundabout Layout	1:200	A3	-
20-04/229	AutoTRAK Layouts	1:200	A1	-



2.0 RESPONSE TO FURTHER INFORMATION REQUEST

2.1 Item No. 1: Green Space Factor Compliance

Item No. 1 states:

*"The Applicant is requested to calculate the Green Space Factor (GSF) to ensure that it has been met. Measures such as blue/green roofs could be considered if necessary to achieve the GSF. Section 12.4.2 of the South Dublin County Development Plan 2022-2028 provides further detail on the requirements for the GSF as part of planning applications. The Green Space Factor calculator and Guidance Note can be found online in the adopted plan related documents at:
[https://www.sdcc.ie/en/devplan2022/adopted-plan/related-documents.](https://www.sdcc.ie/en/devplan2022/adopted-plan/related-documents)"*

2.1.1 Applicant's Response Summarised

The following Response has been prepared by both Tom Phillips + Associates and Carew Kelly Architects.

We refer the Local Authority to the enclosed drawing prepared by Carew Kelly Architects.

For the purpose of responding to the RFI, we have broken the Response into two parts and respond to these individually:

1. Green Space Factor Calculation
2. Compliance with Section 12.4.2 of the SDCCP 2022-2028

Green Space Factor (GSF) Calculation

The subject site is located within lands zoned MRC – Major Retail Centre with the objective to protect, improve and provide for the future development of a Major Retail Centre. The Green Space Factor (GSF) Calculations prepared by Carew Kelly Architects and submitted with this response has regard to the GSF Guidance note which specifies that lands zoned 'MRC' must achieve a minimum GSF Score of 0.5.

According to the calculations, accounting for all proposed green infrastructure interventions, the proposed development achieves a score of 0.56 which is above the minimum GSF score required for the subject 'MRC' zoning.

A summary of green infrastructure interventions accounted for within the calculations and proposed within the site are as follows:

1. short lawn – 142 sqm
2. tall lawn – 961 sqm
3. permeable paving – 686 sqm
4. shrubs, height below 3m – 127 sqm
5. shrubs/hedgerow, height above 3m – 77 sqm
6. preserved hedgerow – 22.7 sqm
7. new trees – 2,932 sqm



8. preserved trees – 402 sqm
9. green roofs – 1576 sqm

As such it is contended that the required GSF score has been met. Please see attached drawing no. 22/04/226- prepared by Carew Kelly Architects which outlines GSF calculations and proposed green infrastructure intervention areas across the site.

Compliance with Section 12.4.2 of the SDCDP 2022-2028

Section 12.4.2 of the Development Plan specifies requirements within planning applications to demonstrate contribution to the protection/enhancement of Green Infrastructure (GI) elements stating that:

- *“In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on-site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone*
- *Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands);*
- *The characteristics and assets of the proximate GI Core, Corridor or SteppingStone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;*
- *Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;*
- *Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;*
- *Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.”*

Applicant Response:

The subject application is considered to be small scale as it relates to modifications to an existing permission for a self-storage facility and is located along the edge of the M50 Primary GI Strategic Corridor and just outside the ‘core area’ within the Liffey Valley Primary GI Strategic Corridor.

The site itself is part of an ‘Urban Fringe’ zone identified within the Development Plan and does not contain any particular GI Asset other than the existing trees along the northern boundary of the site and a hedgerow. These trees and hedgerow are proposed to be preserved as per the landscape plan for the site.



Owing to its proximity to primary Strategic GI Corridors identified within the Development Plan, the proposal aims to provide a variety of new planting in the form of shrubs, hedgerow and trees which are native to the region (thereby avoiding non-native invasive species) along with green roof cover across various roof levels to promote the site as a potential 'stepping stone' and to enhance Green Infrastructure within/proximate to the Strategic GI Corridors identified above.

As such, a revised and simplified landscape plan is submitted with this response to indicate the scope of proposed new planting and tree/hedgerow preservation. (See attached Drawing no. 22-04-225 titled *Proposed Landscape Plan* prepared by Carew Kelly Architects.)

2.2 Item No. 2: Vehicular Access and Circulation

Item No. 2 states:

"The following information is required in relation to the proposed vehicular access and circulation:

(i) An explanation of the purpose for the proposed circular road feature to the rear carpark – Is it a roundabout? If road markings are required, applicant to submit revised drawing showing same?

(ii) Provide a letter from a fire consultant stating that the proposal would allow for fire-fighting services to access the site as necessary.

(iii) Demonstrate bin truck access/egress using AutoTRAK to the Refuse Collection area to the front.

(iv) Provide a revised layout showing AutoTRAK analysis for emergency vehicles at the proposed turning head.

(v) Submit a revised layout showing:

a. Clear traffic priority at the junction with Johnson & Johnson

b. Proposed road-markings and road signage for this junction

c. Stop text and triangle to be switched to the correct side of the road at the exit from the rear carpark."

Applicant Response:

The information sought as per Item no. 2 of the RFI has been addressed by drawings prepared by Carew Kelly Architects and GDaly Consulting and a letter from the Fire consultant ARUP as indicated below:

- (i) **Proposed Circular Road Feature:**
The application previously proposed a roundabout at said location. This has now been amended to remove the roundabout and propose a straight road. Revised drawings have been prepared by Carew Kelly and submitted with this response. (See attached drawing no. 20-04/228 titled *Revised Roundabout Layout* attached with this submission)
- (ii) **Letter from Fire Consultant:**
Please find attached with this submission a letter from ARUP (Fire consultant) demonstrating that the proposal is capable of accommodating fire-fighting services on site as required.



- (iii) **Bin Truck Access/Egress:**
Bin truck access using AutoTRAK to the refuse collection area at the front of the site has been demonstrated by GDaly Consulting and Carew Kelly Architects. (See drawing no. 20-04/229 titled *AutoTRAK Layouts* attached with this submission).

- (iv) **AutoTrak Analysis at Proposed Turning Head:**
A revised layout drawing has been prepared by Carew Kelly Architects to demonstrate AutoTRAK carried out by GDaly Consulting at the proposed turning head. (See drawing no. 20-04/229 titled *AutoTRAK Layouts* attached with this submission)

- (v) **Revised Layout at Junction with Johnson and Johnson:**
A revised drawing prepared by Carew Kelly Architects indicating clear traffic priority, proposed road markings, road signage, and amended location of the stop text triangle positioned to the correct location. (See drawing no. 22/04/227- titled *Revised Traffic Layout* attached with this submission)



3.0 CONCLUSION

In summary, the proposed development:

1. Complies with the minimum GSF score for MRC zoned lands;
2. Facilitates the contribution and enhancement of green infrastructure proximate to Strategic GI Corridors identified within the Development Plan; and
3. Proposes efficient vehicular access and circulation within the subject site and its immediate surroundings.

Having regard to the pattern of development in the area and to the provisions of the *South Dublin County Development Plan 2022-2028* is in accordance with the proper planning and sustainable development of the area.

We trust that this detailed Response fully addresses the *Request for Further Information* and we look forward to a favourable decision.

Yours faithfully,

Brian Minogue
Associate
Tom Phillips + Associates

Encl.



APPENDIX A: REQUEST FOR FURTHER INFORMATION, DATED 9TH JANUARY 2023 (REG. REF. SD22A/0418).

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department



Telephone: 01 4149000 Fax: 01 4149104 Email: planningdept@southdublincoco.ie

Tom Phillips & Associates
80, Harcourt Street
Dublin 2

PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Decision Order Number: 0021	Date of Decision: 09-Jan-2023
Register Reference: SD22A/0418	Registration Date: 04-Nov-2022

Applicant: Oceanglade Ltd

Development: Modifications to the self-storage facility and ground floor cafe permitted under Ref. SD21A/0284 comprising of an increase in the gross floor area from 8, 008sq.m to 19, 673sq.m as a result of an increase in the total number of internal floors from 4 to 7 levels, extension of the basement and an increase in building length along the northwest corner of the building; An increase in the overall building height of 1.5m; Minor internal layout alterations; Minor alterations to the roof layout; Elevational changes including alterations to the external north and west facade and an increase in depth of canopy on the south facade; Relocation and reconfiguration of the car parking and provision of reserved bay for larger vehicles, inclusion of an additional 5 EV spaces (10 in total), there is no proposed change to the overall number of permitted car parking spaces; Provision of 20 covered bicycle parking spaces; Alterations to internal access road and landscaping; Provision of additional landscaping and all associated and ancillary site works.

Location: Liffey Valley, Dublin 22

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 04-Nov-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following **ADDITIONAL INFORMATION** must be submitted.

1. The Applicant is requested to calculate the Green Space Factor (GSF) to ensure that it has been met. Measures such as blue/green rooves could be considered if necessary to achieve the GSF. Section 12.4.2 of the South Dublin County Development Plan 2022-2028 provides further detail on the requirements for the GSF as part of planning applications. The Green Space Factor calculator and Guidance Note can be found online in the adopted plan related documents at:



<https://www.sdcc.ie/en/devplan2022/adopted-plan/related-documents>.

2. The following information is required in relation to the proposed vehicular access and circulation:
- (i) An explanation of the purpose for the proposed circular road feature to the rear carpark – Is it a roundabout? If road markings are required, applicant to submit revised drawing showing same?
 - (ii) Provide a letter from a fire consultant stating that the proposal would allow for fire-fighting services to access the site as necessary.
 - (iii) Demonstrate bin truck access/egress using AutoTRAK to the Refuse Collection area to the front.
 - (iv) Provide a revised layout showing AutoTRAK analysis for emergency vehicles at the proposed turning head.
 - (v) Submit a revised layout showing:
 - a. Clear traffic priority at the junction with Johnson & Johnson
 - b. Proposed road-markings and road signage for this junction
 - c. Stop text and triangle to be switched to the correct side of the road at the exit from the rear carpark.

NOTE: The applicant should note that any submission made in response to requests for additional information will be examined by the Planning Authority and may be deemed to be significant additional information. The applicant will be contacted by the Planning Authority if the additional information submission is deemed significant. In this event the applicant(s) will be requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months of the date of decision**. If the information is not received within this period, the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked "ADDITIONAL INFORMATION" and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD22A/0418

Date: 09-Jan-2023

Yours faithfully,

Pamela Hughes
for Senior Planner