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Dublin 2

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

<b>Decision Order Number:</b> 0150	<b>Date of Decision:</b> 13-Feb-2023
<b>Register Reference:</b> SD22A/0457	<b>Registration Date:</b> 09-Dec-2022

**Applicant:** Cape Wrath Hotel Unlimited

**Development:** The development will consist of a cemetery including: 8, 047 No. traditional burial plots; Columbarium walls; 1 single storey reception building (214.7m2 Gross Floor Area (GFA)) comprising a reception, 1 office, 1 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 vehicular access points serving the proposed cemetery; 110 car parking spaces (25 spaces to the east of the reception building and 85 within overflow car park areas to the south of the development); 8 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.

**Location:** Citywest Hotel & Convention Centre, Saggart, Co. Dublin

**Application Type:** Permission

Dear Sir /Madam,

With reference to your planning application, received on 09-Dec-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. Masterplan and Interim Design Proposals

A. The applicant is proposed a perimeter road around the site boundary. No rationale or justification for this road has been provided. The applicant is therefore requested to provide a masterplan for the remaining blue line lands, to provide some insight into the future intention of these lands and thereby the requirement to provide the road as currently designed.

B. It is noted that the applicant will be severing the existing golf course, with half of the fairways remaining untouched by the current proposal. The applicant is requested to provide information in relation to the temporary use of these lands, and any associated landscaping proposals for the remaining undeveloped golf course.

2. Intended Operator

The applicant is requested to provide information in relation to the intended operator of the finished development.

3. Reception Building

The applicant has provided plans showing a 114 sq.m reception room, with seating and an area for laying out coffins. The applicant is requested to provide more information in relation to the intended use of this space, clarifying if funeral services or wakes will be carried out at the site. In providing this response, the applicant should have reference to the OS zoning objective, noting that funeral home use, specifically in relation to the 'laying out of remains, the holding of burial services and the assembling of funerals' is not permitted under this zoning objective. Revised plans may be submitted in light of these zoning considerations, as appropriate.

4. Battery Storage Area

The applicant is requested to provide more information in the requirement for the battery storage area, why this is required and further details in relation to its design and appearance.

5. Japanese Knotweed

A. A detailed survey undertaken by an approved environmental consultant for the presence of Japanese Knotweed.

B. An Invasive Species Management Plan as to how the Japanese Knotweed will be addressed. This should be provided by suitably qualified specialist who can demonstrate experience and technical abilities in invasive species management and control.

Please note that Japanese Knotweed can be far more extensive than the visible parts on the surface and that the underground parts of the plant may extend laterally up to 7 metres beyond this. Therefore, this survey must also note any knotweed adjoining the site.

6. Mammal Surveys

It is noted from the Ecological Impact Assessment that mammal surveys were not undertaken during the appropriate time period. The applicant is requested to undertake these surveys during the appropriate period, and provide a report detailing the results. Any mitigation measures recommended must be adapted into the scheme.

7. Roads, Access and Traffic Safety

A. The applicant/developer is requested to submit accurate plans demonstrating the provision of a visibility splay of 2.0m x 90m in both directions from the entrance. Sightlines should be shown to the near side edge of the road to the right hand side of entrance and to the centreline of the road to the left hand side of the entrance (when exiting).

B. The applicant is requested to clarify the proposed access arrangements for existing entrance gate connecting the central access road to the N7

C. The applicant is requested to clarify the rationale for the 6.5m wide perimeter access road and accompanying cycle lane and footpath which continues from the 2 no proposed access points to the existing access road which runs parallel to the N7.

D. The applicant is requested to submit a Mobility Management Plan detailing the predicted number of visitors travelling to and from the site by public transport or active travel and any measures to be

put in place to promote the use of sustainable transport.

E. The applicant is requested to submit a revised car parking layout showing a reduction in the number of car parking spaces, taking into account visitors travelling by sustainable transport modes.

i. 20% of the spaces shall be Electric Vehicle Charging spaces.

ii. 5% of the spaces shall be for mobility impaired users.

F. The applicant/developer should submit a revised Transportation Assessment which analyses how local traffic will be affected if the Garter Lane/Fortunestown Lane junction upgrades are not implemented. Clarification should also be given on how the visitor traffic to/from the cemetery was calculated, noting discrepancies in the figures given in the Transport Assessment and the Verde Environmental Assessment. Data on daily and yearly funeral numbers should be clearly shown and justified based on similar developments.

#### 8. Watercourses

A. Proposed 900mm culvert pipe for watercourse is too small. Redesign the channel with a box culvert of suitable size instead of a 900mm pipe. Ensure that each end of such a culvert has SuDS (Sustainable Drainage Systems) friendly wing walls such as green walls or equivalent.

B. Submit a drawing in plan and cross-sectional view showing revised culvert design.

C. Clarify in a letter or report if a Section 50 from OPW is required or not to develop proposed culvert at watercourse. If consent is required, this must be provided for.

#### 9. Landscape Design Proposals

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development including Landscape Design Statement/Rationale, Detailed Play Layout and GI Plan. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The applicant shall provide the following additional information:

A. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.

B. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.

C. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.

D. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site

E. Demonstrate how natural SUDS features can be incorporated into the design of the proposed development, such as green roofs and other such SuDS. Guidance on SuDS can be found at SDCC website at link: [sdcc-sustainable-drainage-explanatory-design-and-evaluation-guide.pdf](#).

F. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on the existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population. The applicant should demonstrate how they intend to reduce fragmentation of existing green infrastructure and provide a green infrastructure plan showing connections through the site and connections to wider GI

network.

#### 10. Landscape Maintenance and Management

The applicant is requested to provide details of the scheme for the maintenance and management of the proposed landscape scheme including the play area for the lifetime of the development. The scheme shall include the following:

- i. methods for the proposed maintenance regime;
- ii. detailed schedule;
- iii. details of who will be responsible for the continuing implementation
- iv. details of any phasing arrangements

#### 11. Sustainable Drainage Systems

A. The applicant should demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems.

B. In relation to SUDS, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates and showing what SuDS (Sustainable Drainage Systems) are proposed.

C. SUDS Management - 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. Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development. 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.

E. The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m<sup>3</sup>. Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m<sup>2</sup> are proposed such as, green roofs, permeable paving, buildings, roads and their respective run off coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

#### 12. Arboricultural Method Statement

The applicant is requested to provide a detailed Arboricultural Method Statement (AMS). The AMS shall include justification and mitigation for any tree removal proposed and details of how trees will be protected at all stages of the development. Recommendations for tree surgery works and details of any tree surgery works necessary to implement the permission will be required as will the method and location of tree protection measures, the phasing of protection methods where demolition or construction activities are essential within root protection areas and design solutions for all problems encountered that could adversely impact trees (e.g. hand digging or thrust-boring trenches, porous hard surfaces, use of geotextiles, location of site compounds, office, parking, site access, storage etc.). All works shall be carried out in accordance with the agreed AMS.

### 13. Aviation Safety

- A. Due to the proximity to Casement Aerodrome, the developer should produce a Wildlife Aviation Impact Assessment and implement adequate bird control measures during the construction phase to mitigate the effects of birds on Air Corps flight operations.
- B. The applicant is requested to provide a Glint and Glare Assessment to ensure the development will not impact flight safety in relation to Casement Aerodrome.

### 14. Hydrogeology

- (i) Additional information about the lake on site is requested. Is it constructed/natural? If constructed, details of how it is fed, lined and its capacity are requested
- (ii) The applicant is requested to provide a site drawing that overlays the interment locations with ground water depths
- (iii) Provide details on the number of traditional interments per plot (stacking), if this varies across the proposed cemetery, a site drawing showing this is requested
- (iv) It is noted that the proposed southwest of the site (approximately 1/3 of the site) has no ground investigation information, the applicant is requested to provide ground investigation information for same or justify the omission.
- (v) It is requested the applicant ensure the site boundary display in drawing 1872\_PL-P\_00 corresponds with Figure 7.1 of the Environmental and Hydrogeological Assessment Report.
- (vi) The applicant is requested to demonstrate consultation with Inland Fisheries Ireland on surface water quality issues and incorporate any recommendations of IFI, given the nature of the proposed use.

**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/0457

**Date:** 15-Feb-2023

Yours faithfully,

*Pamela Hughes*  
for **Senior Planner**