

# MANAHAN PLANNERS

Town Planning Consultants

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24<sup>th</sup> April 2023

Land Use & Planning Department  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24.

PLANNING COUNTER

25 APR 2023

RECEIVED

## RESPONSE TO REQUEST FOR FURTHER INFORMATION

**Re: Response to Request for Further Information regarding an application (Reg. Ref. SD23A/0001) for Development at Site D, Liffey Valley Office Campus, Dublin 22.**

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Dear Sir/Madam,

Further to the above application, we wish to make the following submission to support the application by Winmar Developments Unlimited Company. The following comments are in reply to the Request for Further Information from South Dublin County Council dated 28<sup>th</sup> February 2023, Reg. Ref. SD23A/0001.

The eight Items raised by the Planning Authority are set out below in italics followed by the response in each case.

1. *“(a) The applicant is requested to provide a design statement, that addressed the following requirements:*
  - *CDP Section 12.5.2, The Plan Approach, Design Statements and Materials Colours and Textures;*
  - *Policy QDP2 Objective 1*
  - *Policy QDP7 Objective 1*
  - *Policy QDP8 Objective 1*
  - *CDP 12.5.3 Density and Building Heights*
  - *Policy QDP8 Objective 2*
  - *Appendix 10 of the CDP 2022-2028*
  - *12.5.4 Public Realm: (At the Site Level)*
  - *12.5.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)*

In response to Item 1(a), the Area Planner noted that “*there are no significant concerns regarding the overall design of the proposal, however, insufficient detail and rationale has been provided in the submission regarding the suitability of the proposal to the context.*” EMD Architects have prepared a Design Statement which addresses the above requirements, outlines the proposed design proposal and defines how the proposed development will form an integrated element within its wider context. It is considered that the contextual analysis and assessment of the proposal set out in the Design Statement is in accordance with the provisions of the South Dublin County Development Plan 2022-2028,

the South Dublin County's Building Height and Density Guide and the Urban Design Manual 2009.

*(b) The applicant is requested to submit CGIs and photomontages that demonstrate how the proposal would look from key view points.*

In light of the Design Statement and the proposed development in its wider context, the Design Team selected 4 no. key views in the surrounding area, and these have been prepared as verified survey photographs and CGI generated montage images of the proposed development by Digital Dimensions. These images allow assessment of both the visual impact and the architectural design of the proposed development. It is considered that this satisfies Item 1(b).

*(c) The applicant is requested to provide full details of all materials, signage (including materials and illumination) and boundary treatments.*

In response to Item 1 (c), EMD Architects have prepared further specification and visual images of the type of materials, signage and boundary treatments, which is included as Section B (Material Design) of the Design Statement.

*(d) The applicant is requested to re-consider the location / design of the ESB substation, which is in a prominent location.*

The Design Team has revised the design to relocate the ESB substation, from its prominent location at the south of the site, to a revised location at the west of the site. This is considered to be a less dominant location for this necessary infrastructural building. The revised location is indicated on the architectural drawings amended as part of this submission.

*(e) The applicant is requested to demonstrate through their building height contextual analysis that the proposed development has an acceptable impact on the adjacent commercial properties. The applicant is also requested to demonstrate that the proposed open spaces receive sufficient sunshine hours."*

In response to the first part of this item, the Design Team have satisfied themselves through the contextual analysis undertaken as part of the Design Statement (Section A; Contextual Design), that the impact of proposed development on the surrounding commercial properties is an acceptable impact. This is demonstrated visually in the CGI images prepared by Digital Dimensions. It is noted that the site is an un-developed site, for which planning permission was granted for an office building in 2001, contemporaneous with the adjacent Block B and C office buildings.

In response to the second part of this item, the building and landscape design envisaged the entrance plaza as a semi-enclosed hard landscaped concourse, predominantly north-facing, and thus will be in shadow due to its orientation. The design of the open spaces between the building and the Fonthill Road are envisaged as inviting soft landscaped spaces, orientated to the east, south and west, which will create opportunities for interaction between the building and its external environment and wider context. The relocation of the ESB substation building, noted in item 1(d) above, will create an enlarged space for a south facing garden and terrace.

Digital Dimensions have prepared a shadow study indicating the proposed development in the context of the surrounding commercial properties and the open spaces of the development as an amenity space. It is considered that the above satisfies Item 1(e).

2. *"The applicant is requested to demonstrate compliance with:*
  - *EDE1 objective 6*
  - *12.5.1 Universal Design*
  - *12.8.6 Public Art*
  - *12.10.1 Energy Performance in New Buildings*
  - *12.10.54 Solar Photovoltaic*
  - *12.11.5 Aviation, Airports and Aerodromes, 12.11.6 Restricted and Prohibited Development and 12.11.7 Shielding / Safeguarding."*

The Design Team have addressed the above elements, and this is provided in Section C (Compliance with relevant sections of the Development plan) in the Design Statement prepared by EMD Architects.

A Public Art Statement has been prepared by Gannon & Associates Landscape Architects, providing information on the design, location, and impact of the proposed artwork.

In terms of Aviation, Airports and Aerodromes, it is considered that the proposed development will not adversely affect, or be an obstacle to, aviation. Should planning permission be granted, the applicant invites a condition with a similar wording to that described below:

*"-Appropriate management methods during construction shall be employed to avoid sites becoming bird attractant.*

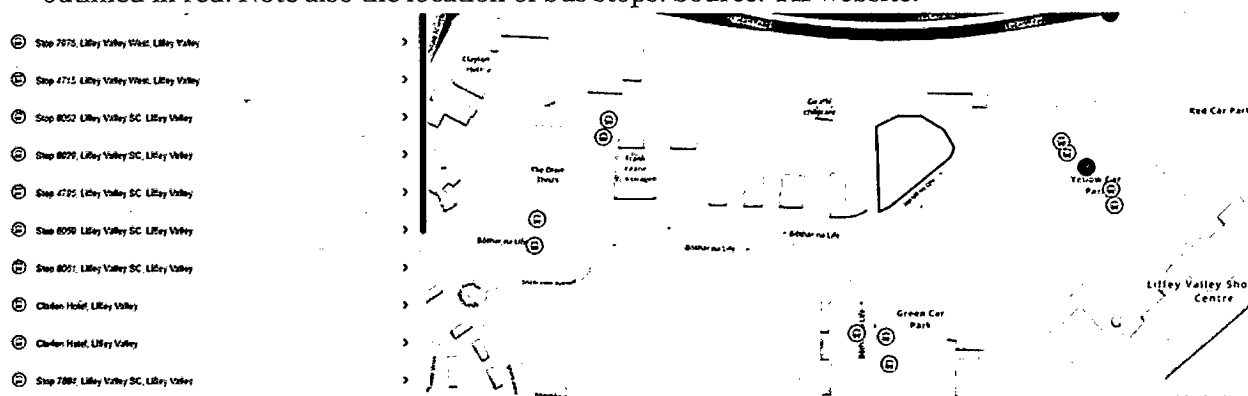
- Mitigation measures shall be taken if negative effects on Irish Air Corps flight operations become apparent due to bird activity on site.*
- Crane activities at the site shall be coordinated with Military Air Traffic Services at least 90 days in advance for assessment of proposed crane activities.*
- Prior to the commencement of development an aviation obstacle warning lighting scheme for the development shall be agreed with Military Air Traffic Services."*

3. *"The applicant is requested to submit:*
  - (i) a letter of no objection from the National Transport Authority (NTA).*
  - (ii) Confirmation from Transport Infrastructure Ireland (TII) that the bus stop/layby opposite to the vehicle access is no longer required and will be removed.*
  - (iii) Clarification of vehicle access to the ESB substation."*

In response to Item 3(i), it is not the practice of the National Transport Authority (NTA) to issue a letter of confirmation of no-objection to an applicant. They liaise instead directly with the Planning Authority

In response to Item 3(ii), the Design Team have reviewed the lay-bys to the north of the proposed building. These lay-bys are not used and were never used as a bus-stop. For many years buses did not enter into the Liffey Valley campus, despite the wishes of the owners/operators of the centre. Instead, the bus stops were located together at the edge of the campus. It was only recently (19<sup>th</sup> February 2023) that the new €20million Liffey Valley

Bus Plaza was opened as part of Bus Connects. It is very close to the site and therefore additional bus stops are not likely to be needed or developed just outside the entrance to the plaza. Such a location would be unrealistic. In the unlikely event of TII requiring the use of these laybys they have the option of making a submission to the Planning Authority, but have not done so. See image overleaf showing relationship of bus plaza to the application site, outlined in red. Note also the location of bus stops. Source: TII website.



In response to Item 3(iii), the revised location of the ESB substation provides vehicular access to this building, within the publicly accessible area of the entrance plaza. See attached drawings.

4. **(a)** *Underground attenuation tanks are not acceptable and SuDS (Sustainable Drainage Systems) must be used to attenuate surface water. The applicant is requested to submit a revised drawing in A1 size surface water attenuation using SuDS only (note: A3 size drawings are too small and difficult to read) Examples of SuDS can be found in SDCC SuDS Guide.*
- (b)** *The SAAR value of 962mm appears high. Water services estimate SAAR for Liffey Valley as 777mm. the applicant is requested to submit a report showing revised surface water attenuation calculations showing site specific Met Eireann rainfall Data and SAAR value.*
- (c)** *The applicant is requested to submit a drawing in A1 size showing the setback distance from proposed development to an existing 900mm surface water sewer south of development. There shall be a minimum setback distance of 8m to the outside diameter of existing 900mm surface water sewer*

In response to Item 4(a), (b) and (c), MMOS Engineers have revised the design in line with recent thinking in relation to Suds and the disposal of surface water. The revised proposal is indicated in the accompanying Technical Note and services layout drawings prepared by MMOS Engineers which forms part of this response submission. MMOS Engineers have also updated their original Civil Engineering Report and this included with this submission.

In response to Item 4(c), The Design Team have redesigned the basement levels of the proposed scheme to ensure that the building below ground level is a minimum of 8 metres from the outside diameter of the existing 900mm surface water drain to the south of the building. This revised design, together with the location of the existing 900mm surface water drain, is indicated on the revised architectural dwg. no's. P-06 and P-07.

5. *The applicant is requested to submit a Confirmation Letter of Feasibility Letter from Irish Water for proposed development in relation to both water supply and wastewater).*

A Confirmation Letter of Feasibility from Irish Water for the proposed development dated 12<sup>th</sup> January 2023 in relation to both water supply and wastewater is enclosed with this response submission.

6. *The drainage proposal does not comply with SDCC Guidelines with regards to treatment of stormwater. The applicant is requested to provide additional Information showing a natural SUDs system complying with SDCC Guidance, which should not include underground attenuation tanks. In addition to attenuating water there should be a clear treatment train and water is to be used for amenity and biodiversity purposes. Please consider use of blue/green roof, swales, bioretention areas, Suds tree pits, ponds etc. This will likely impact most of the green areas indicated on the landscape plan. Keeping water on the surface rather than using an underground piped system will also assist with achieving the required Green Space Factor score.*

The revised design has been prepared by the Design Team to ensure an integrated approach to processing storm water on-site. This design is indicated in revised drawings and reports, prepared by MMOS Engineers and Gannon Landscape Architects.

7. *The applicant is requested to submit a Green Infrastructure Plan. The Green infrastructure Plan should include the following information:*
  - *Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County.*
  - *Indicate how the development proposals link to and enhance the wider GI Network of the County.*
  - *Proposed GI protection, enhancement, and restoration proposals as part of the landscape plan, where appropriate, for the site including planting of native trees, hedgerows, open water areas, wildflower areas etc.*
  - *Proposals for identification and control of invasive species where appropriate, for the site.*

Gannon & Associates Landscape Architects have prepared a Green Infrastructure Plan which addressed the above requirements. The Green Infrastructure Plan, alongside the associated maps, showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County; indicates how the proposed development links to and enhances the wider GI Network of the County and describes the proposed GI protection, enhancement, and restoration proposals as part of the landscape plan.

8. *A Green Space Factor (GSF) Worksheet shall be submitted by the applicant for the proposed development detailing how they have achieved the appropriate the minimum Green Space Factor (GSF) scoring established by their land use zoning. MRC = 0.5.*

Gannon Landscape Architects had undertaken calculations in respect of the landscape design and compliance with the Green Space Factor (GSF) index. The revised landscape design has been assessed using the Green Space Factor (GSF) Worksheet. This document is enclosed as part of this response submission and achieves an acceptable GSF score.

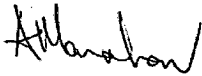
## **Conclusion**

It is considered that the information submitted as part of this response to a Request for Further Information is sufficient to allow the Planning Authority to make a full assessment of the proposed development.

The proposal is an appropriate design response to a prominent site and is consistent with the land-use zoning in the Development Plan and the design principles and policies espoused therein. The design, scale and massing have been carefully considered in the context of the prevailing height and massing of the neighbouring structures. We believe the proposal is consistent with the pattern of development and surrounding established uses and will contribute to and enhance the on-going development of the Liffey Valley Major Retail Centre.

Accordingly, we request that the Planning Authority proceed to issue a favourable Decision.

Yours faithfully



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**Tony Manahan**  
**Manahan Planners**