

Comhairle Chontae Atha Cliath Theas

PR/0541/23

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD22A/0424 **Application Date:** 09-Nov-2022
Submission Type: Additional **Registration Date:** 28-Apr-2023
Information

Correspondence Name and Address: Thornton O'Connor Town Planning 1, Kilmacud Road Upper, Dundrum, Dublin 14

Proposed Development: Refurbishment and extension of the existing 3 storey building and a Change of Use of the existing building and site from a vacant addiction service facility to a National Ambulance facility. Demolition of a staircase and boiler room (40sq.m) and the removal of an external stair-core, entrance ramp and steps to the north of the building; and the provision of lateral and vertical extensions at ground, first and second floor levels principally comprising a single storey, two-bay ambulance garage, increasing the gross floor area of the building from 943sq.m to 1,420sq.m; the rationalisation of floor space in the existing building; the provision of an external canopy to shelter 14 No. emergency vehicles; the provision of a power washing station towards the south-western corner of the site; ancillary staff car-parking; cycle parking; revised elevational treatments; boundary treatments; hard and soft landscaping; and all associated works above and below ground.

Location: Glen Abbey Complex, Belgard Road, Dublin 24

Applicant Name: Health Service Executive

Application Type: Permission

(AOCM)

Description of Site and Surroundings:

Site Area: stated as 0.33 hectares.

Site Description:

The application site contains a three-storey detached flat roof building formerly used as an addiction service facility. The site is located within the Glen Abbey industrial/commercial complex, on the west side of Belgard Road.

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Site Visited: 19 December 2022

Proposal:

Permission is sought for the following:

- **Change of use from vacant addiction service facility to National Ambulance Base facility**
- **Refurbishment and extension of existing 3-storey building** including:
 - Demolition of stair core and boiler room
 - Removal of external stair-core, entrance ramp and steps to north of the building
 - Provision of lateral and vertical extensions at ground, first and second floor – principally comprising single storey, two-bay ambulance garage
 - Provision of external canopy to shelter 14 no. emergency vehicles
 - Provision of power washing station
 - Ancillary staff car and cycle parking
 - Revised elevational treatments
 - Boundary treatments
 - Hard and soft landscaping
 - All associated site works

Zoning:

The site is subject to zoning objective 'REGEN' – *'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.'*

Consultations:

Public Realm:	Additional Information recommended
Roads:	Additional Information recommended
Water Services:	Additional Information recommended Irish
Water:	Additional Information recommended
Environmental Health Officer (EHO):	No objection, conditions recommended

SEA Sensitivity Screening

Indicates no overlap with relevant environmental layers.

Submissions/Observations /Representations

Submission expiry date – 13 December 2022

No submissions or observations were received.

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Relevant Planning History

There is no planning history recorded on the South Dublin system for the subject site. Of note, a Strategic Housing Development (SHD) was permitted on the adjoining site to the west in 2021. A summary of this application is provided below.

SHD3ABP-309916-21: Demolition of the existing industrial and commercial office buildings totalling c.4,628sq.m; Construction of a Build-to-Rent Housing Development comprising **170 apartment units** and crèche arranged in 2 blocks across 4-7 storeys over basement car park (total gross floor area c.13,880sq.m excluding basement); The residential development consists of: 9 x1 bedroom studio apartments; 94 x1 bedroom/2 person apartments; 2 x2 bedroom/3 person apartments; 34 x2 bedroom/4 person apartments; 24 x2 bedroom/4 person duplex apartments and 7 x3 bedroom/5 person apartments with north, south, east and west facing terraces/balconies throughout; Internal communal amenity spaces at ground and fourth floor levels comprising reception, gym, lounge, cinema/tv room, events rooms and ancillary areas; External communal open space including children's play areas and informal amenity spaces at ground floor level between Blocks A and B; Communal roof garden at fourth floor level - total external communal open space c.1,005sq.m; Public open space at ground floor level to the east and south of Block B totalling c.1095sq.m; 1 creche with associated outdoor play area at ground floor level; 73 car parking spaces comprising 64 basement spaces, 4 accessible parking spaces and 5 visitor spaces at surface level; 354 bicycle spaces comprising 264 resident spaces at basement level and 90 visitor spaces at ground floor level; Reconfiguration/removal of existing car parking to the north of the site and access road resulting in a total of 28 car spaces serving the adjoining site; All associated plant including heating centres, gas room, water storage room, break tank room, comms room and bin storage at basement level, ESB substation and switch room at ground level and circulation spaces and stair and lift cores throughout; Vehicular/pedestrian access to the east from Belgard Road. All existing vehicular entrances serving adjoining sites maintained. Fire/emergency and refuse vehicle access and pedestrian access to the south from Colbert's Fort; All associated site development and infrastructural works, services provision, foul and surface water drainage, extension to the foul network, access roads/footpaths, lighting, landscaping and boundary treatment works. Any person may, within the period of 5 weeks beginning on the date of receipt by An Bord Pleanála of the application and on payment of the prescribed fee of €20 (except for certain prescribed bodies), make a submission or observations in writing to An Bord Pleanála, 64 Marlborough Street, Dublin 1 or online at www.pleanala.ie. Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8588100). **Permission granted.**

Relevant Enforcement History

No recent, relevant, files recorded for subject site.

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Pre-Planning Consultation

None recorded for subject site.

Relevant Policy in South Dublin County Council Development Plan 2022-2028

Section 2.6.7 Monitoring of Growth / Active Land Management

Policy CS4: Active Land Management

Facilitate the re-use and regeneration of vacant sites and landbanks through various measures to promote compact urban growth in line with the Core Strategy.

Section 2.7.1 Dublin City and Suburbs

Chapter 4 Green Infrastructure

Section 4.1 Methodology

GII Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

Section 4.2.1 Biodiversity

GI2 Objective 4: To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.

Section 4.2.2 Sustainable Water Management

GI4 Objective 1: To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.

Section 8.8 Healthcare Facilities

Policy COS6: Healthcare Facilities

Support the Health Service Executive (HSE) in their aim to provide access to a range of quality health services, in line with Sláintecare and relative to the scale of each settlement and community, and facilitate other statutory and voluntary agencies, and the private sector in the provision of healthcare facilities and services, including the system of hospital care and the provision of community based primary care facilities appropriate to the size and scale of each settlement.

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COS6 Objective 2: To promote healthcare facilities of an appropriate scale to be provided in new communities on a phased basis in tandem with the delivery of housing, in accordance with the phasing requirements of Local Area Plans and approved Planning Schemes and in locations that are accessible by public transport, walking and cycling.

COS6 Objective 3: To support the provision of appropriately scaled healthcare facilities within existing settlements, in locations that are accessible by public transport and safe walking and cycling infrastructure

10.1 Energy Planning in South Dublin

Section 10.2.6 Solar PV

Section 11.2.1 Sustainable Urban Drainage Systems (SuDS)

Policy IE3: Surface Water and Groundwater

Manage surface water and protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

Chapter 12 Implementation and Monitoring

Section 12.8.3 Healthcare Facilities

Section 12.10.4 Solar Photovoltaic

Relevant Government Guidelines

Project Ireland 2040 National Planning Framework, Government of Ireland (2018).

Regional, Spatial & Economic Strategy 2020-2032 (RSES), Eastern & Midlands Regional Assembly (2019)

Design Manual for Urban Roads and Streets, Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2013).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009).

OPR Practice Note PN01 Appropriate Assessment Screening for Development Management (March 2021)

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Assessment

The main issues for assessment concern the following:

- Zoning and Council Policy
- Visual and Residential Amenity
- Roads
- Green Infrastructure
- Drainage
- Aviation
- Environmental Health
- District Heating
- Appropriate Assessment
- Environmental Impact Assessment

Zoning and Policy

South Dublin County Development Plan 2022 - 2028

The site is subject to zoning objective 'REGEN' – *'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.'*

The land use zoning matrix, contained in 12.4, for 'REGEN' provide for uses as follows:

- Permitted in Principle: Health Centre, Office less than 100 sq.m, Offices 100 sq.m-1,000 sq.m, Offices over 1,000 sq.m, Public Services
- Open for Consideration: Doctor / Dentist, Hospital, Primary Health Care Centre

While the specific use for a National Ambulance Base facility is not included, it is considered that it could generally be considered as a supporting use for medical uses that are both permitted in principle and open for consideration as per Table 12.4. On this basis, the use is considered acceptable and compliant with the 'REGEN' zoning of the site.

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Tallaght Town Centre Local Area Plan 2020

The site is located on the edge of the Cookstown neighbourhood of the LAP, which has the vision of '*An attractive mixed use residential led neighbourhood with distinctive urban qualities and high levels of access to public transport and the urban*

centre'. Relevant Key Objectives for the neighbourhood include:

- *CK1: Emergence of a vibrant mixed use residential-led neighbourhood.*
- *CK2: Create new urban block structure.*
- *CK4: Improve legibility throughout the area and provision of new streets linking to nearby hubs and The Centre.*
- *CK8: Encourage and facilitate higher intensity employment uses and economic development.*
- *K9: Encourage design proposals to provide appropriate space to accommodate non-residential uses, particularly for existing businesses in the Cookstown area which can be appropriately accommodated in a mixed-use development with a substantial residential component.*

The site is located within Development Parcel CT-G, as per Figure 3.4. The plot ratio range is between 0.75 – 1.0. Area specific requirements for the CT-G development parcel include:

- *Enhanced pedestrian and cyclist linkages to Belgard Luas Stop.*

Figure 3.6 indicates a vision for a mixed-use frontage at the site, with a height strategy indicating heights of 6 – 7 storeys for residential development, or 5 – 6 storeys for commercial development, matching the Height Strategy for the LAP area contained in Figure 2.8. The current application relates to the refurbishment of an existing 3-storey building and would therefore **not comply** with the height vision of the LAP. This could form a reason for **refusal** for contravening the height strategy of the LAP.

However, it is noted that, while the LAP states:

The plot ratio and building height of any proposed development shall not normally exceed the maximum plot ratio or building height thresholds for any particular site, block or parcel of land, except where there is a compelling case of a significant public or economic benefit.'

it does not state that not achieving minimum building heights cannot be overcome where there is a significant public or economic benefit. It is considered that this is also a relevant consideration in this application.

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Objective CF 5 states:

'It is policy of the plan to support and encourage the expansion of healthcare services at Tallaght Hospital, liaise with the Health Service Executive (HSE) to ensure that the scope of services provided are adequate to meet identified local service gaps and to support the provision of healthcare services in Tallaght Town Centre to cater for the future needs of the projected population in the area.'

Objective CF 6 states:

'It is the policy of the Council to support the Health Service Executive (HSE) and other statutory and voluntary agencies in the provision of appropriate healthcare facilities, including the system of hospital care and the provision of community based primary care facilities.'

It is considered that the proposal accords with Objectives CF 5 and 6 insofar as it proposes to provide supporting medical services required by the HSE and therefore overcomes the potential contravention of minimum building heights as it would provide a significant public benefit.

Visual and Residential Amenity

The applicant is proposing to refurbish an existing, vacant, HSE facility. From a site visit it was clear that this building is in a poor condition, in terms of its visual appearance, and any works to improve the appearance of this building and to facilitate its reuse would be welcomed.

The existing building is 3-storeys with a flat roof. A part single / part 2-storey extension would be constructed to the south and stair and lift cores would provide additional height above the existing flat roof. The elevational treatment would comprise a mixture of red painted plaster and cladding with integrated windows. All windows and doors would be replaced and altered. It is considered that the revisions would provide for a more modern looking building, with materials and finishes appropriate for the proposed use. In this regard, the building is considered acceptable in terms of visual amenity. The building would have solar panels on the roof, and it is not considered these would pose a significant impact in terms of residential or visual amenity.

A daylight and sunlight assessment has been provided which concludes that all units within the permitted SHD to the west would still pass BRE recommendations in terms of internal daylight if the proposed scheme were permitted. This is considered acceptable. Given the orientation of the site, it is not considered that there would be significant impacts of overshadowing or loss of light as a result of the development on the neighbouring permitted SHD and this is considered acceptable.

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Noise

There would be some concern regarding the movement of ambulances from the site, and the requirement for sirens. Given the changing nature of development in the area, noting that 170 apartments have been approved at the adjoining site, it is considered that there could be a potential conflict of the use and the emerging character of the area.

It is noted that the Belgard Road is busy and traffic noise is the predominant source of noise in the area. The Noise Impact Assessment submitted by the applicant states that *'due to the critical nature of the services offered by emergency vehicles that exit from this development, conducting a noise impact assessment of siren noise is not appropriate.'* The Planning Authority disagrees with this assertion as a full understanding of the noise impact of the sirens is a critical consideration in assessing this application. It would be against the proper planning and sustainable development of the area to permit a use that would potentially have a significant impact on nearby uses, both residential and commercial, as a result of noise nuisance. In this regard, the applicant should be requested to provide **additional information** that clearly addresses the noise impact of the ambulance sirens.

Roads

The Roads Department have reviewed the application and have recommended the following **additional information** is sought:

- 1 *Applicant to submit a revised layout which clearly indicates where the vehicular access point is proposed. Entrance detail must identify:*
 - *whether there are any changes to the existing arrangement*
 - *all relevant dimensions (entrance width)*
 - *details of any gates (sliding, automated, additional pedestrian gate? etc)*
 - *any shared surfaces*
 - *road markings and signage*
 - *visibility splays*
- 2 *Applicant must submit a revised layout which shows safe access to all ambulance spaces, accompanied by AutoTRAK analysis displaying how turning manoeuvres can be carried out safely to all spaces (Minimum reversing clearance behind perpendicular parking spaces must be proportional to vehicle size).*
- 3 *Applicant to submit a rationale explaining the reasoning for the proposed number of staff parking spaces (based on number of staff/drivers).*
- 4 *Applicant must submit a revised layout showing in greater detail the proposed two-bay ambulance garage with AutoTRAK analysis showing safe access/egress.*

These items are considered appropriate to request to ensure the safety of the development, and that all standards of the Development Plan are complied with.

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Green Infrastructure

The site does not appear to be located within a Core Area, Primary GI Corridor or Secondary GI Link, as per Figure 4.4 of the Development Plan.

The Public Realm Section have reviewed the application and have recommended the following **additional information** is requested:

1. *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. 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:

- i. 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.*
- ii. 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.*
- iii. 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.*
- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site*
- v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development*
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this 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.*

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2. *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 m³ . Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m² 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.*

3. *Green Infrastructure and Green Space Factor (GSF)*

The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:

- a) *To demonstrate how they intend to reduce fragmentation of existing green infrastructure. The applicant should provide a green infrastructure plan showing connections through the site and connections to wider GI network.*
- b) *To demonstrate how the appropriate Greening Factor will be achieved for the relevant land use zoning objective. See link to the Green Space Factor Worksheet: Related Documents – SDCC*

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4. Boundary Treatment

The applicant is requested to submit elevation drawings specifying the proposed boundary treatment for the subject site.

The development would result in increased hardstanding at the site, and the loss of some portion of grassed land. On this basis, it is considered appropriate to ensure that the impacts of this are mitigated, particularly through the provision of SuDS. The recommended **additional information** should be sought, save for A.I item 3b relating to the green space factor. This is not considered to be such a critical measure as the application primarily relates to the refurbishment of an existing building, rather than the provision of new development.

Drainage

Surface Water

Water Services have reviewed the application and have recommended **additional information** is sought as follows:

- 1.1 There is no report showing surface water attenuation calculations for proposed development.
Submit a report showing surface water attenuation calculations for proposed development. Include site area and areas of different surface types in m2. Show what attenuation is provided and what is required in m3.*
- 1.2 It is unclear what if any SuDS (Sustainable Drainage Systems) are proposed for the development. Submit a report and drawing showing what SuDS are proposed. Examples of SuDS include, Swales, permeable paving, green area detention basins or other such SuDS.*
- 1.3 Contact Water Services in South Dublin County Council prior to submission of above reports and drawings to discuss same.*

As stated above, it is considered pertinent to request **additional information** in relation to SuDS.

Water Supply and Foul Drainage

Irish Water have reviewed the application and have recommended **additional information** is requested in relation to providing an Irish Water confirmation of feasibility for the development, and connection agreements. As the works relate to the refurbishment of an existing serviced building, it is not considered necessary to require these items from the applicant.

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Aviation

Glint and Glare

The applicant has submitted a glint and glare assessment. The applicant should be requested to consult with Casement Aerodrome/Air Corps and get their approval of the proposal by way of a **request for further information**.

Environmental Health

The Environmental Health Officer (EHO) has reviewed the application and has recommended the following construction phase **conditions**:

1. *Noise*

To control, limit and prevent the generation of Environmental Noise Pollution from occurring the Environmental Health Department of South Dublin County Council, hereby informs you that:

The use of machinery, plant, or equipment (which includes pneumatic drills, generators and the movement on and off the site of construction vehicles) is NOT PERMITTED outside the following hours

- *Before 07.00 hours on weekdays, Monday to Friday*
- *Before 09.00 hours on Saturdays.*
- *After 19.00 hours on weekdays, Monday to Friday.*
- *After 13.00 hours on Saturdays.*
- *Not permitted at any time on Sundays, Bank Holidays or Public Holidays.*

2. *Air Quality*

During the construction / demolition phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances.

These **conditions** are considered appropriate in the interests of public health and safety and to minimise noise nuisance.

District Heating

The applicant should be requested to by **further information** to investigate the opportunity to connect into the Tallaght District Heating project. As a **condition** of any permission, futureproofing connection to this scheme should be required, as well as the potential to revert to traditional heating measures if required in future.

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Screening for Appropriate Assessment

The subject site is not located within nor within close proximity to a European site. The proposed development is located within an established urban regeneration area and comprises the change of use of an existing building and associated works to provide an ambulance facility.

Having regard to:

- the scale and nature of the development,
- the location of the development in a serviced urban area, and
- the consequent absence of a pathway to the European site,

it is considered that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on the Natura 2000 network and appropriate assessment is not therefore required.

Environmental Impact Assessment

Having regard to the nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Other Considerations

Development Contributions

In the event of a grant of permission, the applicant, the Health Service Executive, would not be liable for development contributions given their status as a registered charity.

SEA Monitoring Information

Building Use Type Proposed:	Change of use and refurbishment of building
Floor Area:	1,420 sq.m
Land Type:	Urban
Site Area:	0.33 Hectares.

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Conclusion

Having regard to the provisions of the South Dublin County Council Development Plan 2022-2028, the Tallaght Town Centre Local Area Plan 2020, the overall design of the development and the reports of relevant departments; it is considered that the following additional information should be requested:

- Noise impact assessment of sirens and how this can be mitigated to minimise conflict with existing and permitted uses in the area
- Revised layout which clearly indicates where the vehicular access point is proposed and visibility splays and surfacing.
- Revised layout showing safe access to all ambulance spaces, with AutoTRAK analysis displaying how turning manoeuvres can be carried out safely.
- Rationale explaining the reasoning for the proposed number of staff parking spaces (based on number of staff/drivers).
- Revised layout showing in greater detail the proposed two-bay ambulance garage with AutoTRAK analysis showing safe access/egress.
- Landscape Design Proposals – provide detailed landscape design for the proposed development including comprehensive Landscape Design Rationale and Planting Plan and mitigation for loss of green infrastructure and provision of natural SuDS.
- Sustainable Drainage Systems – demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems and submit plans showing how surface water shall be attenuated to greenfield run off rates
- SUDS Management Plan
- Report to show surface water attenuation calculations for proposed development.
- Green Infrastructure – demonstrate how applicant intends to reduce fragmentation of existing green infrastructure.
- Boundary Treatment – elevation drawings specifying the proposed boundary treatment for the subject site.
- Report showing surface water attenuation calculations for proposed development.
- Report and drawing showing what SuDS are proposed.

Recommendation

Request Further Information.

Further Information

Further Information was requested on 06/01/23

Further Information was received on 28/04/23

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Consultations

Public Realm:	No objection, conditions recommended
Roads:	Clarification of Additional Information recommended
Water Services:	Clarification of Additional Information recommended
Irish Water:	No objection, conditions recommended

Submissions/Observations

No further submissions/observations received.

Further Information

The Further Information requested was as follows:

1. *The Planning Authority is not satisfied with the applicants conclusion that the nature of the proposed use precludes any requirement for an assessment of potential noise impact from the ambulance sirens. In the interest of the proper planning and sustainable development of any area it is critical to ensure that uses are not permitted that might conflict with existing and permitted uses in any given area. In this regard, the applicant is requested to submit a noise impact assessment for the operation of the facility, specifically assessing the likely noise associated with traffic movements throughout the day and night at the site. It should be clarified at what point/location will sirens be switched on when existing the site.*
2. *Roads and Access*
The applicant is requested to submit the following:
 - a. *A revised layout which clearly indicates where the vehicular access point is proposed. Entrance detail must identify:*
 - i. *whether there are any changes to the existing arrangement*
 - ii. *all relevant dimensions (entrance width)*
 - iii. *details of any gates (sliding, automated, additional pedestrian gate?, etc)*
 - iv. *any shared surfaces*
 - v. *road markings and signage*
 - vi. *visibility splays*
 - b. *A revised layout which shows safe access to all ambulance spaces, accompanied by AutoTRAK analysis displaying how turning manoeuvres can be carried out safely to all spaces (Minimum reversing clearance behind perpendicular parking spaces must be proportional to vehicle size).*
 - c. *A rationale explaining the reasoning for the proposed number of staff parking spaces (based on number of staff/drivers), with reference to the maximum parking rates allowable per Chapter 12 of the Development Plan.*
 - d. *A revised layout showing in greater detail the proposed two-bay ambulance garage with AutoTRAK analysis showing safe access/egress.*

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3. *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. 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:

- i. 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.*
- ii. 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.*
- iii. 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.*
- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site*
- v. Demonstrate how natural SUDs features can be incorporated into the design of the proposed Development*
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this 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.*
- vii. The applicant is requested to submit elevation drawings specifying the proposed boundary treatment for the subject site.*

4. *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*

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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 m³ . Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m² 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.*
- 5. Green Infrastructure**

The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:

 - a. To demonstrate how they intend to reduce fragmentation of existing green infrastructure. The applicant should provide a green infrastructure plan showing connections through the site and connections to wider GI network.*
- 6. Surface Water and SuDS**

There is no report showing surface water attenuation calculations for proposed development. The applicant is requested to submit the following:

 - a. A report showing surface water attenuation calculations for proposed development. Include site area and areas of different surface types in m². Show what attenuation is provided and what is required in m³.*
 - b. It is unclear what if any SuDS (Sustainable Drainage Systems) are proposed for the development.*
 - c. Submit a report and drawing showing what SuDS are proposed. Examples of SuDS include, Swales, permeable paving, green area detention basins or other such SuDS.*

The applicant is advised to contact Water Services in South Dublin County Council prior to the submission of above reports and drawings to discuss same.
- 7. Aviation**

The applicant is requested to consult with Casement Aerodrome/Air Corps and get their approval of the proposal regarding any potential glint and glare.

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8. *District Heating*

The applicant is requested to investigate linking the proposed development to the District Heating System and future proofing the building in the event that HeatNet is no longer available in the future.

Assessment of Further Information

Item 1 – Noise Assessment

The applicant has stated that the proposed development would be a 'hub' location for dynamic deployment, with ambulances driving from the Glen Abbey complex to dynamic deployment locations throughout the county to await emergency calls. Ambulances would not be expected to deploy directly from the complex, therefore reducing the likelihood of significant disturbance to future residential development. This response is acceptable.

Item 2 – Roads and Access

The Roads Department have reviewed the application and have stated satisfaction with the response except for the access/egress of 2 no. parking spaces at the southern boundary. To address this concern, their report recommends **clarification of additional information** is sought showing a minimum clearance of 6m from all ambulance bays to the road kerbing to allow for safe vehicular movements. It is considered that this can adequately be addressed by **condition**.

Item 3 – Landscape Design Proposals

The Public Realm Section have reviewed the additional information and have stated no objection, recommending a **condition** is included as follows:

Implementation of Landscape Plan

The proposed landscaping scheme shown on submitted Landscape Plan (Dwg. No. (80) 01 shall be implemented in full, within the first planting season following completion of the development, in addition:

- a) All hard and soft landscape works shall be completed in full accordance with the submitted plans.*
- b) All trees, shrubs and hedge plants supplied shall comply with the requirements of BS: 3936, Specification for Nursery Stock. All pre-planting site preparation, planting and post-planting maintenance works shall be carried out in accordance with the requirements of BS : 4428 (1989) Code of Practice for General Landscape Operations (excluding hard surfaces).*
- c) All new tree plantings shall be positioned in accordance with the requirements of Table 3 of BS 5837: 2012 "Trees in Relation to Design, Demolition and Construction – Recommendations".*
- d) Any trees, shrubs or hedges planted in accordance with this condition which are removed, die, become severely damaged or become seriously diseased within three years of planting shall be replaced within the next planting season by trees,*

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shrubs or hedging plants of similar size and species to those originally required to be planted.

REASON: To ensure satisfactory landscape treatment of the site which will enhance the character and appearance of the site and the area, in accordance with the policies and objectives contained within the CDP 2022-2028.

This **condition** is considered appropriate to ensure the adequate implementation of approved plans.

Item 4 – Sustainable Drainage Systems

Water Services have reviewed the additional information and have stated dissatisfaction with the proposals, recommending the following **clarification of additional information** is sought:

1.1 There is insufficient SuDS (Sustainable Drainage Systems) proposed for the development.

Submit a drawing showing additional SuDS for proposed development. Show a treatment train and show how surface water is attenuated above ground.

Show on surface water layout drawing how much attenuation is proposed from each SuDS element in m³.

Note: Rain water harvesting is welcome but it does not provide attenuation when it is full. As such surface water attenuation of proposed 101m³ must be provided by SuDS.

1.2 Prior to submission of revised SuDS Drawings contact Water Services and Public Realm to discuss same.

The Public Realm Section have stated no objection to the additional information, recommending the following **conditions**:

1. SUDS Management Plan

A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.*
- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development including drainage / attenuation calculations for same.*
- The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Bio retention*

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tree pits should be designed so that they enable tree pits to both support healthy tree growth while at the same time to help treat and attenuate water coming from hard landscaping areas.

- *Natural Suds measures should be detailed to remove/ reduce the requirement for underground attenuation tanks in line with the development plan objectives.*
- *Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. 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.*

REASON: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under the CDP 2022-2028.

2. *SuDS Implementation*

The submitted SuDS scheme shall be implemented within a timescale to be agreed and approved by the Planning Authority and thereafter managed and maintained in accordance with the approved details.

REASON: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with POLICY GI4: SUSTAINABLE DRAINAGE SYSTEMS of the CDP 2022-2028.

There is insufficient time to request **clarification of additional information** from the applicant. An extension of time could be sought however, it is not considered that, given the date of the expiration of the 6-month period, there would be sufficient time for the applicant to review such a request and arrange an extension. On this basis, it is considered acceptable, and necessary, to **condition** the requirements for surface water drainage. The applicant should engage with the Water Services and the Public Realm Section prior to submitting any compliance, to reduce delays.

Item 5 – Green Infrastructure

The Public Realm Section have reviewed the additional information and have stated no objection subject to conditions requiring a similar response from the applicant in relation to reducing the fragmentation of green infrastructure and achieving the appropriate Green Space Factor.

As stated previously, it is not considered necessary for the applicant to achieve a GSF score on the site as the proposal relates mainly to refurbishment of an existing building and less than 500 sq.m additional floor area is proposed. Furthermore, the development is located in a developed urban area, with little green infrastructure. The proposal appears to be retaining much of the existing green infrastructure on site and this is considered sufficient to meet the requirements of the Development Plan in this regard. Given the nature of the proposal, further details in this regard is considered onerous.

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Item 6 – Surface Water and SuDS

As stated under Item 4, Water Services are not satisfied with the submission and have recommended **clarification of additional information** is sought. As there is insufficient time to do so, it is considered appropriate to address all outstanding concerns with surface water and SuDS by **condition**.

Item 7 – Aviation

The applicant has provided email correspondence with the Department of Defence which confirms the Glint and Glare Assessment provided is acceptable and any negative effects that become apparent as a result of PV cells should be mitigated as they occur. This response is acceptable.

Item 8 – District Heating

The applicant has investigated the possibility to connect to the district heating infrastructure for Tallaght. This involved attempting to engage with the Council however, no response was received. The applicant has determined that, on review of the Phase 1 documentation, connection would not be possible however, notes the proposed heating system for the building is based on heat pump technology and the building has been designed as Zero Carbon. The applicants response is considered acceptable.

Conclusion

The development subject to conditions, is considered to be consistent with the zoning objective 'REGEN' – *'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery'*, and the relevant provisions in the County Development Plan 2022-2028 and is considered acceptable.

Other Considerations

Development Contributions

The applicant is the Health Service Executive (HSE), a registered charity. The development is not for profit or gain and therefore **no contribution is due**.

Conclusion

Having regard to the provisions of the South Dublin County Council Development Plan 2022-2028 and the overall design and scale of the development proposed it is considered that, subject to conditions set out below, the proposed development would not seriously injure the amenities of the area or of property in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area.

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Recommendation

I recommend that a decision be made pursuant to the Planning & Development Act 2000, as amended, for the reasons set out in the First Schedule hereto, to Grant Permission for the said development in accordance with the said plans and particulars, subject to the condition(s) specified in the Second Schedule hereto, the reasons for the imposition of the said condition(s) being as set out in the said Second Schedule.

FIRST SCHEDULE

It is considered that the proposed development accords with the policies and objectives of South Dublin County Council, as set out in the South Dublin County Council Development Plan 2022 - 2028 and subject to the conditions set out hereunder in the Second Schedule is hereby in accordance with the proper planning and sustainable development of the area.

SECOND SCHEDULE

Conditions and Reasons

1. Development to be in accordance with submitted plans and details.
The development shall be carried out and completed in its entirety in accordance with the plans, particulars and specifications lodged with the application, and as amended by Further Information received on 28/04/2023, save as may be required by the other conditions attached hereto.
REASON: To ensure that the development shall be in accordance with the permission, and that effective control be maintained.
2. Roads – Ambulance Parking Clearance
Prior to the commencement of development, the applicant shall submit, for the written agreement of the Planning Authority, a revised drawing that shows a minimum clearance of 6m from ambulance bays to road kerbing at the north of the site. The applicant should engage directly with the Roads Department ahead of making a submission to ensure an adequate response to this item.
REASON: In the interest of the proper planning and sustainable development of the area.
3. Sustainable Urban Drainage Systems (SuDS)
Prior to the commencement of development, the applicant shall submit the following for the written agreement of the Planning Authority. Prior to making any submission, the applicant is strongly advised to engage directly with Water Services and the Public Realm Section to resolve any outstanding issues in relation to the following:
 - a. a drawing showing additional SuDS for proposed development. Show a treatment train and show how surface water is attenuated above ground.
 - b. Show on surface water layout drawing how much attenuation is proposed from each SuDS element in m³. Note: Rain water harvesting is welcome but it does not provide attenuation when it is full. As such surface water attenuation of proposed 101m³

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must be provided by SuDS.

REASON: In the interest of the proper planning and sustainable development of the area

4. SUDS Management Plan

Within 6 months of first occupation of the proposed development a comprehensive SUDS Management Plan shall be submitted to the Planning Authority for written agreement demonstrating that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.
- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development including drainage / attenuation calculations for same.
- The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Bio retention tree pits should be designed so that they enable tree pits to both support healthy tree growth while at the same time to help treat and attenuate water coming from hard landscaping areas.
- Natural Suds measures should be detailed to remove/ reduce the requirement for underground attenuation tanks in line with the development plan objectives.
- Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. 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.

REASON: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under the CDP 2022-2028.

5. Implementation of Landscape Plan

The proposed landscaping scheme shown on submitted Landscape Plan (Dwg. No. (80) 01 shall be implemented in full, within the first planting season following completion of the development, in addition:

- a) All hard and soft landscape works shall be completed in full accordance with the submitted plans.
- b) All trees, shrubs and hedge plants supplied shall comply with the requirements of BS: 3936, Specification for Nursery Stock. All pre-planting site preparation, planting and post-planting maintenance works shall be carried out in accordance with the requirements of BS : 4428 (1989) Code of Practice for General Landscape Operations

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(excluding hard surfaces).

c) All new tree plantings shall be positioned in accordance with the requirements of Table 3 of BS 5837: 2012. Trees in Relation to Design, Demolition and Construction – Recommendations.

d) Any trees, shrubs or hedges planted in accordance with this condition which are removed, die, become severely damaged or become seriously diseased within three years of planting shall be replaced within the next planting season by trees, shrubs or hedging plants of similar size and species to those originally required to be planted.

REASON: To ensure satisfactory landscape treatment of the site which will enhance the character and appearance of the site and the area, in accordance with the policies and objectives contained within the CDP 2022-2028.

6. Environmental Health – Construction Phase

A. Noise

The use of machinery, plant, or equipment (which includes pneumatic drills, generators and the movement on and off the site of construction vehicles) is NOT PERMITTED outside the following hours:

- Before 07.00 hours on weekdays, Monday to Friday
- Before 09.00 hours on Saturdays.
- After 19.00 hours on weekdays, Monday to Friday.
- After 13.00 hours on Saturdays.
- Not permitted at any time on Sundays, Bank Holidays or Public Holidays.

B. Air Quality

During the construction / demolition phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances.

REASON: In the interest of public health and safety.

7. Aviation Safety – Glint and Glare

In the event that any negative effects become apparent on air or ATC operations at Casement Aerodrome as a result of the photovoltaic cells, the owner/occupier shall take measures necessary to mitigate these effects without delay to a level acceptable to Casement Aerodrome.

REASON: In the interest of air traffic safety.

NOTE: The applicant is advised that under the provisions of Section 34 (13) of the Planning and Development Act 2000 (as amended) a person shall not be entitled solely by reason of a permission to carry out any development.

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NOTE: The applicant or developer should ensure that all necessary measures shall be taken by the contractor to prevent the spillage or deposit of clay, rubble or other debris on adjoining roads during the course of the works and to ensure that any such instances arising are remedied immediately.

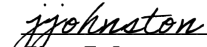
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REG. REF. SD22A/0424

LOCATION: Glen Abbey Complex, Belgard Road, Dublin 24



Jim Johnston,
Senior Executive Planner



Gormla O'Corrain,
Senior Planner

ORDER: A decision pursuant to Section 34(1) of the Planning & Development Act 2000, as amended, to Grant Permission for the reasons set out in the First Schedule above, in accordance with the said plans and particulars, subject to the condition(s) specified in the Second Schedule above, the reasons for the imposition of the said condition(s) being as set out in the said Second Schedule is hereby made.

Date: 24 May 2023



Mick Mulhern, Director of Land
Use, Planning & Transportation