

Response to Clarification of Further Information PA.Reg.Ref.SD22A/0460

Unit 1, M50 Business Park

June 2023



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1. INTRODUCTION

1.1 Background

This report has been prepared on behalf of Creighton Properties LLC to respond to a request for clarification of additional information (CAI) in relation to a PA.Reg.Ref.SD22A/0460.

This report addresses each item in the order they appear.

2. ITEM 1 – SUDS AND GREEN SPACE FACTOR

2.1 CAI Request – (i) SUDS

' (i) SUDS

Clarification of additional information is requesting comprising the incorporation of some additional natural SUDS features into the proposed drainage system for the development, such as rain gardens, green walls, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- *Removal or reduction of underground attenuation having regard to on-site natural SUDS*
- *Demonstrate the treatment train and provide additional SUDS proposals with biodiversity and/or amenity value for the catchment in the residential areas.*
- *Clarification of additional information is requested to fill in the table (provided on AI planning report) and provide clear explanations/rationale for selecting/not selecting additional natural SUDS measures.'*

2.2 Applicant's Response

A suite of documents is submitted in response to this item of clarification, including CSEA drawing no. 22_112-CSE-00-XX-SK-C-2111 – Permeable and Impermeable Areas and Proposed Surface Water Attenuation Overview Report and a SuDS Management Plan which identify the additional SUDS measures proposed by the applicants.. CSEA have maximised all available site area for SUDs features. In particular, they have applied a treatment train approach has discussed in the Proposed Surface Water Attenuation Overview Report.

In particular, a rain garden and additional green roof have been proposed. Green and blue roofs have been assessed for the existing warehouse roof, however it is not feasible due to limitations of the existing steel structure which is to be reused. They have also been assessed for the existing admin/office roof, however it is not feasible due to mechanical roof plant and PV arrays. A raingarden has therefore been proposed for the office roof which provides a similar attenuation and secondary treatment function as green roof without affecting structural capacity of the roof or roof mounted equipment. The rain garden would be located to the north west corner of the site. Green roof has been added to the existing security hut, which does have structural capacity to accommodate and on the bin and bike shelter. Grasscrete area has been maximised across the site and concrete/hardstanding areas have been minimised as far as possible without negatively impacting on the vehicles movements and operations of the proposed development.

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On foot of amendments, the attenuation storage volume has been reduced by 2.6%. The table below summarises changes in volume for the different elements between the original submission and the clarification of additional information.

Item	Original Submission	Current Submission	units	% Change
Attenuation Storage Volume	532.5	518.7	m ³	-2.6%
Green Roof Area	36	65	m ²	+81%
Roof Area draining to Raingarden	0	113	m ²	+100%
2-Stage Treatment Area	1502	1644	m ²	+10%

The SUDs table was also filled in as can be seen below. The SUDs table provides further explanation and assessment of SUDs features.

SuDS Measures	Measures to be used on this site	Rationale for selecting/not selecting measure	Area of Feature (m ²)	Attenuation volume of feature (m ³)
Swales	No	Site area not large enough to accommodate this measure	N/A	N/A
Integrated constructed Tree Pits	No	Not suitable for this site due to amount of underground services. Most trees on the site are existing and are to be retained.	N/A	N/A
Green/Blue Roofs (Intensive and Extensive Green Roofs)	Yes, extensive green roofs on ancillary buildings (Security Hut, Bike Shelter, Bin Store).	Used for ancillary buildings to reduce rainwater entering the drainage system. Not possible on existing main warehouse due to structural limitations. Not possible on admin/office roof due to Mechanical plant and solar PV array.	65	This has an effective storage capacity of 2.8m ³ due to the reduction in the runoff coefficient.
Filter Drain	No	Not suitable for this site due to amount of underground services.	N/A	N/A
Permeable pavement (Grasscrete, Block paving, Asphalt etc.)	Yes, extensive use across the site. Grasscrete coverage has been maximised across all areas where it is technically feasible.	The use of grasscrete across the has been implemented to reduce the overall hardstanding area of the site. This reduces the attenuation requirements as less water will contribute to the catchment during an extreme rainfall event as the time of concentration has improved. It is assumed that grasscrete can	1466	14.66

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SuDS Measures	Measures to be used on this site	Rationale for selecting/not selecting measure	Area of Feature (m ²)	Attenuation volume of feature (m ³)
		store marginal volumes of water (10mm depth) across the area.		
Green wall	No	Not suitable for this site due to extensive amount of plant adjacent to external walls.	N/A	N/A
Filter strips	No	Site area not large enough to accommodate this measure and due to the amount of underground services.	N/A	N/A
Bio-retention systems/Raingardens	Yes, Raingarden to the west of the office block. The raingarden area has been maximised in areas not congested with underground services.	A portion of the office block roof will be drained to the Raingarden to divert this rainwater away from underground attenuation. This reduces the attenuation requirements as less water will contribute to the catchment during an extreme rainfall event.	61	11
Blue Roofs	No	Structure of existing building not suitable for blue roof.	N/A	N/A
Detention Basins	No	Site area not large enough to accommodate this measure and due to the amount of underground services, car parking areas, loading areas and security apparatus.	N/A	N/A
Retentions basins	No	Site area not large enough to accommodate this measure and due to the amount of underground services, car parking areas, loading areas and security apparatus.	N/A	N/A
Ponds	No	Site area not large enough to accommodate this measure and due to the amount of underground services, car parking areas, loading areas and security apparatus.	N/A	N/A

SuDS Measures	Measures to be used on this site	Rationale for selecting/not selecting measure	Area of Feature (m2)	Attenuation volume of feature (m3)
Wetlands	No	Site area not large enough to accommodate this measure and due to the amount of underground services, car parking areas, loading areas and security apparatus.	N/A	N/A

To reflect all amendments arising from this CAI, a number of architectural drawings are submitted by Kavanagh Tuite Architects to include:

- J2139-KTA-22-XX-DR-A-5002 Drainage Sections
- J2139-KTA-22-XX-DR-A-2003 Proposed Site Plan
- J2139-KTA-22-XX-DR-A-6523 Security Hut Details

2.3 CAI Request (ii) – Green Space Factor

(ii) Green Space Factor

Green Space Factor The applicant is requested to engage with Laurence Colleran or Oisín Egan oegan@sdblincoco.ie in the Public Realm Section in order to discuss and agree appropriate greening and GI interventions in order to make up the shortfall and improve upon their stated GSF score of 0.34.'

2.4 Applicant's Response

MacroWorks' Landscape response in respect of a Clarification of Additional Information which particularly addresses the Green Space Factor (GSF). This report should be read in conjunction with drawing no. 20230624_LD.UNIT1M50 which shows the proposed amendments which contribute to an improvement in the GSF. As noted in the aforementioned report, the applicants' representatives have consulted the Public Realm Section in South Dublin County Council. This was followed by an exchange of emails between MacroWorks and Oisín Egan, as can be seen in Appendix 1 of this report.

During the meeting, the applicant's representatives and the public realm representative discussed the constrained nature of the site and difficulties associated with making amendments that would significantly increase the Green Space Factor. The inclusion of a rain garden and additional green roof space. were discussed.

As discussed with the Public Realm representatives and the Macroworks report, a number of amendments were made to include: planting a mix of native tree and native understorey planting along the tree line along the north/northwest boundary of the site, the retention of trees along that same boundary, and of shrub planting and grassed areas along the western, southern and eastern site boundaries. Drift of pollinator friendly native wild flower seed mix will be used throughout some the existing grassed areas within the site.

Albeit improved, the GSF is still below the applicable threshold. On this basis, the applicants would be receptive to a condition being applied to a potential grant of permission, on the same model as condition 15 – Green Space Factor which was attached to PA.Reg.Ref.SD22A/0099.

3. ITEM 2 – FIRE CONSULTANT

3.1 CAI Request

'The applicant is required to submit, for verification and record purposes, the specific advice given to them by their Fire Consultant, which details why vehicle access is not required to the north of the building.'

3.2 Applicant's Response

Please refer to the response drafted by Ryan Hegarty, Senior Fire Engineer at BB7 which sets out the considerations for the omission of the vehicle access to the north. Please refer to Appendix 2.

4. CONCLUSIONS

We believe the information presented in this Clarification of Additional Information response adequately addresses any outstanding queries. It should be read in conjunction with the documentation submitted in response to the items of clarification.

Appendix 1 – Consultation with Public Realm

Sybil Berne

From: Oisín Egan <oegan@SDUBLINCOCO.ie>
Sent: Wednesday 28 June 2023 16:33
To: Cian Doughan
Cc: Gerald Rogers; Sybil Berne; Crean, William; Stephen Moylan
Subject: RE: SD22A/0460

Hi Cian,

Having reviewed the submitted information I am satisfied that you have taken our recommendations on board in terms of additional GI interventions and planting which has resulted in an improvement in your GSF Score of 0.1 (i.e. you have brought the score from 0.34 to 0.44.).

Regards,
Oisín Egan
Executive Parks Superintendent | Public Realm | Environment, Water & Climate Change |
South Dublin County Council, County Hall, Tallaght, Dublin 24 | Post Code: D24 YNNS |
Tel: +353 014149000 | Ext: 4261 | e-mail: oegan@sdublincoco.ie |

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From: Cian Doughan <cian@macroworks.ie>
Sent: Wednesday, June 28, 2023 10:13 AM
To: Oisín Egan <oegan@SDUBLINCOCO.ie>
Cc: Gerald Rogers <GeraldR@kavanaghtuite.ie>; Sybil Berne (sberne@mdb.ie) <sberne@mdb.ie>; Crean, William <creanw@amazon.com>; Stephen Moylan <stephenm@kavanaghtuite.ie>
Subject: Re: SD22A/0460

CAUTION: [EXTERNAL EMAIL] Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Oisín,

Thanks again for meeting earlier in the month and providing recommendations for our Green Infrastructure Plan and GSF score.

I've attached our updated drawing and response, which includes our green infrastructure plan.

We would appreciate it if you could review and provide any further comments or recommendations.

Thanks,

Cian Doughan
Landscape Architect



On Tue, Jun 13, 2023 at 4:56 PM Cian Doughan <cian@macroworks.ie> wrote:

Hi Oisin,

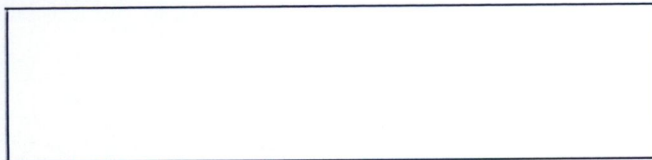
My name is Cian, and I work for Marco Works, the project landscape architect for Unit 1, M50 Business Park Project (SD22A/0460).

As part of the Clarification of Additional Information, we have been requested to engage with yourself or Laurence Colleran (we haven't been provided with an email address for Laurence) with regard to discussing and agree appropriate greening and GI interventions in order to make up the shortfall and improve upon our stated GSF score of 0.34.

Could we set up a meeting to discuss the items above whenever you are available next?

Thanks,

Cian Doughan
Landscape Architect



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Is eolas faoi rún an t-eolas atá sa ríomhphost seo agus d'fhéadfadh go mbeadh sé faoi phribhléid ó thaobh an dlí de. Is don té ar seoladh chuige/chuici agus dósan/dise amháin an t-eolas. Ní ceadmhach do dhuine ar bith eile rochtain a bheith aige/aici ar an ríomhphost seo. Murar duit an ríomhphost seo tá nochtadh, cóipeáil, dáileadh ná aon ghníomh eile a dhéanamh nó aon ghníomh eile a fhágáil gan déanamh ar iontaoibh an ríomhphoist seo toirmiscthe ort agus d'fhéadfadh siad sin a bheith neamhdhleathach. Má fuair tú an teachtaireacht leictreonach seo trí earráid téigh i dteagmháil, le do thoil, leis an té a sheol í nó le info@sdblincoco.ie. Glanadh an teachtaireacht seo le bogearraí Frithvíreas.

Appendix 2 – Supporting Evidence CAI Item 2 (Fire Consultant)

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BB7

Gerald Rogers
Associate
Kavanagh Tuite Architects
Terminus Mills
Clonskeagh
Dublin
D06 XD37

Our Ref: 00505-GE
Planning Ref: SD22A/0460

15th June 2023

Dear Gerald,

Clarification of Additional Information SD22A/0460 – Unit 1, M50 Business Park, Ballymount Avenue, Dublin 12

In relation to the additional information request we provide the below response: -

- 2) (i) **The applicant is required to submit, for verification and record purposes, the specific advice given to them by their Fire Consultant, which details why vehicle access it not required to the north of the building.**

Vehicle access to the building is provided in accordance with Table 5.1 of Technical Guidance Document B, as detailed in Table 1 below:

Table 1: Provision of Vehicle Access

Volume of Building (m3)	Height of Top Storey (m)	Basis for Vehicle Access	Minimum Vehicle Access Required (m)	Vehicle Access Provided (m)	Type of Appliance
19,130 (<28,000)	4.5	15% of perimeter	31	67.2	Pump

Figure 1 below graphically represents the fire tender access provided to the building.

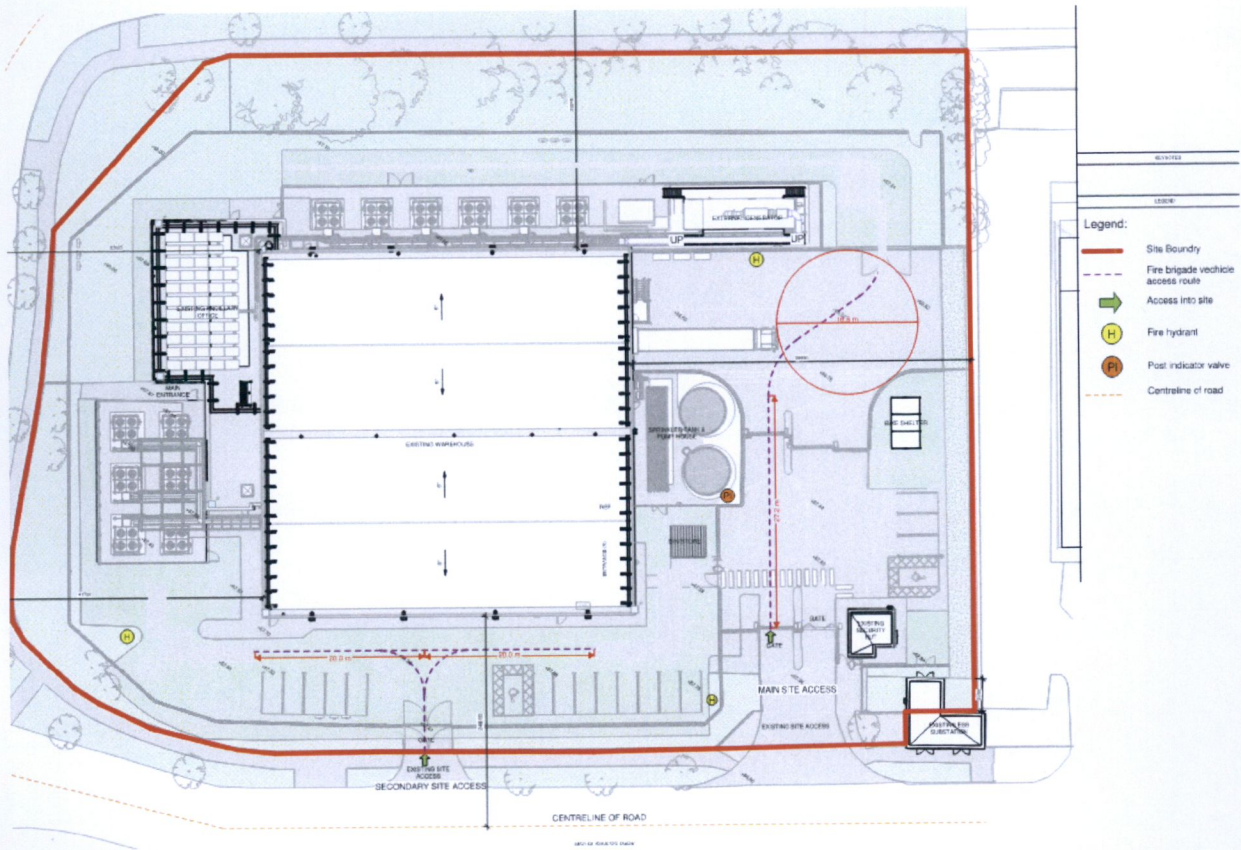


Figure 1: Site plan with vehicle access routes shown

The vehicle access to these elevations and the associated access road will be in accordance with Table 5.2 of TGD-B for a pump appliance, as detailed in Table 2 below.

Table 2: Vehicle Access Route Specifications

Minimum Width of Road Between Kerbs (m)	Minimum width of Gateways Between Kerbs (m)	Minimum Turning Circle Between Kerbs (m)	Minimum Turning Circle Between Walls (m)	Minimum Clearance Height (m)	Minimum Carrying Capacity (tonnes)
3.7	3.1	16.8	19.2	3.7	12.5

We trust that the above responses satisfy all items of clarification.

Yours sincerely

Ryan Hegarty
Senior Fire Engineer, Ireland



20 Fitzwilliam Place, Dublin 2, D02YV58,
Ireland



Phone. +353 1 6762594



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