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

Land Use Planning & Transportation

19 JUL 2023

South Dublin County Council

Tuesday, 18th July 2023
[By Hand]

A Chara,

Re: RESPONSE TO A REQUEST FOR FURTHER INFORMATION RELATING TO A PLANNING APPLICATION FOR DEVELOPMENT A CEMETERY, RECEPTION/MANAGEMENT BUILDING AND ALL ANCILLARY WORKS AT CITYWEST HOTEL AND CONVENTION CENTRE, SAGGART, CO. DUBLIN.

SOUTH DUBLIN COUNTY COUNCIL REG. REF.: SD22A/0457

DATE OF FURTHER INFORMATION REQUEST: 13th FEBRUARY 2023

1.0 INTRODUCTION

1.1 Purpose of this Report

The Applicant, Cape Wrath Hotel Unlimited¹ has retained Tom Phillips + Associates, (TPA) Town Planning Consultants² in association with Murray & Associates, Landscape Architecture³, Cronin & Sutton Consulting⁴, Altemar, Marine and Environmental Consultants⁵, Renaissance Engineering⁶ to respond to this Request for Further Information (RFI) as issued by South Dublin County Council (SDCC) on 13th February 2023 in relation to the above planning application, SD22A/0457.

A copy of South Dublin County Council's Response for Further Information in respect of Reg. Ref. SD22A/0457, dated 13th February 2023, is attached at Appendix A.

¹ 10 Earlsfort Terrace, Dublin 2, D02 T380.

² 80 Harcourt Street, Dublin 2, D02 F449.

³ 16 The Seapoint Building, 44-45 Clontarf Road, Dublin 3.

⁴ 9 19-22 Dame Street, Dublin 2, D02 E267.

⁵ Templecarrig Upper, Greystones, Co. Wicklow, Ireland.

⁶ 67-70 Meath Street, 2nd Floor, Dublin 8.

TOWN PLANNING CONSULTANTS



The specialist Design Team has analysed the Further Information Request and provided a full response to each item. The Applicant's response is set out below under the 14 No. specific request Items.



2.0 RESPONSE TO FURTHER INFORMATION REQUEST

2.1 ITEM 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”.*

2.1.1 Applicant’s Response

In response to Item 1(A), we note that proposed perimeter access road has been amended/curtailed; with the revised access road from Garters Lane providing access to the proposed cemetery at two locations serving the overflow car park and internal footpaths through the development. We refer the Council *Site Layout Plan* (Dwg. No. 872_PL_P_01) prepared by Mitchells & Associates, illustrating this amendment.

We also refer the Council to the *Supplementary Transportation Assessment Report* prepared by NRB Consulting Engineers, which takes account of the operational effects and traffic impacts of this amendment for the proposed development.

With respect to Item 1(B), we note that the application site is located within the former golf club lands, and that these have been unused since 2000. It is noted that, subsequent to the lodgement of the Subject Application, separate Applications have been made by the Applicant on lands within the former golf club (Table 1 refers).



Table 1: Applications within the former golf course at the Citywest Hotel and Convention Centre			
Reg. Ref.	Development Description	Date of lodgement	Status
SD23A/0100	The construction of a Photovoltaic Solar development to the North of the Citywest hotel on lands formally in use as a golf course [comprising a change of use from former golf course to solar development].	09 May 2023	RFI requested on 03 July 2023
SD22A/0464 ⁷	Change of use from disused golf course to Public Park. The proposed new park will retain and maintain the existing man-made lakes. New pathways, lighting, seating, informal play areas, fencing, signage, allotments, bicycle parking, new hard and soft landscaping and tree planting are proposed throughout the site; New car park for 57 spaces from a new vehicular and pedestrian access road via a north-south connection onto Fortunestown Lane will also be constructed.	20 Dec 2022	RFI requested on 22 Feb 2023
ED21/0004	Provision of temporary playing pitch at St. Mary's Park Road, Moneyatta Commons.	18 Jan 2021	Declared Exempt: 08 Feb 2021

These relate to the provision of a PV solar development, to serve the Citywest Hotel and Convention Centre, located to the south of the Application Site (SDCC Reg. Ref. SD23A/0100 refers.) We note that there is a marginal overlap in the application boundaries between both applications.

Planning permission has also been granted for the provision of a Public Park, including all associated hard and soft landscape works, with access from Fortunestown Lane (SD22A/0464 refers).

Finally, in this context, temporary playing pitches have been provided on lands at St. Mary's GAA Club, to the south of Saggart village, further to Declaration under S.5 of the *Planning and Development Acts 2000-2023 ("the Acts")* on the 8th February 2021.

In this context, it is considered that the proposed development constitutes an appropriate use of the former golf club lands, the landscape design informed by the character of the former use. It is considered that the development would complement the separate solar PV energy proposal, to the south of the subject site.

It is noted that the application site does not overlap with the proposed Public Park located to the south of Fortunestown Lane; nor the GAA training pitches off St. Mary's Park Road, to the south of Saggart village.

2.2 ITEM 2

"Intended Operator

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

⁷ The Applicant with respect to the application for the Solar Photovoltaic development is Cape Wrath Hotel Unlimited Company (SD23A/0100).



2.2.1 Applicant's Response

At this stage, a specific operator has not been identified by the Applicant and will be appointed subsequent to a Grant of Permission. Notwithstanding, we note that the Applicant is committed to ensuring that the development is subject to best practice during the operational phase.

2.3 ITEM 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.”

2.3.1 Applicant's Response

In response to this Item, we note the definition of ‘Funeral Home’ as set out in the *South Dublin County Development Plan 2022-2028*, referring to:

“A building or part of a building used for the laying out of remains, the holding of burial services and the assembling of funerals. A building, or part thereof, used solely for making funeral arrangements is regarded as an office.”

In this context, it is confirmed that the range of functions including, *inter alia*, all preparatory work and associated laying out of remains and assembling of funerals, as provided within a Funeral Home, will not be undertaken within the proposed Reception Building.

Operationally, remains (laid out in coffins) would typically arrive from a Funeral Home for burial at specific traditional burial plots within the cemetery. Cremated remains will also be brought to the cemetery for burial within Columbarium Walls (noting that the proposed does not include a Crematorium).

It is intended that the Reception Building will be used as a gathering space prior to burial/internment services at the designated traditional burial plots or columbarium wall within the wider cemetery grounds. The Reception Building would also be used for services prior to the removal of remains for burial at a traditional burial plot.

The Reception Building includes an ancillary office for management of the cemetery as well as toilets for visitors to the cemetery as part of burial services or to visit a grave/columbarium wall.

In this context it is considered that the proposed functions within the Reception Building excludes key salient uses relating to a Funeral Home as defined under the Development Plan, and undertaken pursuant to the *Cemeteries Clauses Act, 1847*.



Moreover, it is considered that the provision of this non-denominational reception/gathering space to be utilised prior and post burials/internments, including holding services, constitutes an essential component to the proposed cemetery at Citywest Hotel and Convention Centre.

2.4 ITEM 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."

2.4.1 Applicant's Response

The Design Team have reviewed this Item and confirmed that the development no longer requires a battery storage area, which is reflected on the updated plans.

2.5 ITEM 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."

2.5.1 Applicant's Response

In response to this Item, we refer the Council to the *Ref SD22A/0457- Request for Further Information (RFI)*, prepared by Altemar Marine & Environmental Consultancy dated 17th July 2023. The response confirms that,

"no invasive plant species listed on the third Schedule of regulation 49 & 50 in the European Communities (Birds and Natural Habitats) Regulations 2011 are noted on site or proximate to the site. An Invasive Species Management Plan is not required on site as no invasive species were noted on site."

It is considered that this fully addresses this RFI Item.

2.6 ITEM 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."

2.6.1 Applicant's Response

In response to this Item, we refer the Council to the *Ref SD22A/0457- Request for Further Information (RFI)*, prepared by Altermar Marine & Environmental Consultancy dated 17th July 2023 and to the *Proposed Development (Cemetery) at Citywest, Saggart, Co. Dublin Badger / Fauna Survey* prepared by Dr. Chris Smal B.Sc. Ph.D. MIEEM, dated 26th May 2023 (Appendix I refers). It is considered that this fully addresses this RFI Item.

2.7 ITEM 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.*

2.7.1 Applicant's Response

In response to Item 7(A) we refer the Council to Drawing CTW-CSC-ZZ-XX-DR-C-0105 Proposed Road Layout_RevA, prepared by Cronin and Sutton Consulting Group, for details indicating the revised sightlines requirement.



In response to Item 7(B) we confirm that no access is to be provided to the N7 from the proposed development and the existing gates will remain closed as is the current arrangement.

In response to Item 7 (C) we refer the Council to the *Supplementary Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared by NRB Consulting Engineers, dated 30 June 2023, which confirms that the proposed perimeter road has now been amended/curtailed, extending from Gartars Lane to the internal service road only, providing access to the overflow car park and footpath network within the development.

We also refer the Council to Drawing CTW-CSC-ZZ-XX-DR-C-0105 Proposed Road Layout_RevA, prepared by CS Consulting Engineers illustrating the revised road layout.

In response to Item 7(D) we refer the Council to the *Travel Plan (Mobility Management Plan) RFI Stage (SDCC Reg Ref SD22A/0457)* contained in Appendix 1 of the *Supplementary Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared by NRB Consulting Engineers, dated 30 June 2023.

In response to Item 7 (E) we note that the overall quantum of car parking has been reduced from 110 No. spaces to 66 No. spaces (23 No. to the east of the reception building (including 13 No. EV spaces) and 43 No. within the overflow car park, as set out in the *Supplementary Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared by NRB Consulting Engineers, dated 30 June 2023.

We also refer the Council to the *Site Layout Plan* (Dwg. No. 872_PL_P_01) for the site prepared by Murray's & Associates; and to Drawing CTW-CSC-ZZ-XX-DR-C-0105 Proposed Road Layout_RevA, prepared by Cronin and Sutton Consulting Group.

In response to Item 7(F) we refer the Council to the *Supplementary Transportation Assessment Report for Saggart/Citywest Cemetery at Gartars Lane, Saggart, Co. Dublin* prepared by NRB Consulting Engineers, dated 30 June 2023.

2.8 ITEM 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.”*

2.8.1 Applicant's Response

In response to Item 8 we refer the Council to Section 3.0 of the Response prepared by Cronin and Sutton Consulting Group and associated drawings.

2.9 ITEM 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 Planting Plan 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, aboveground 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.”*

2.9.1 Applicant’s Response

In response to this Item 9(A) we refer the Council to the *Response re. Planning Further Information* request and *Landscape Design Statement and Green Infrastructure Plan RFI Stage SDCC Reg. Ref. SD22A/0457*, dated 28th June 2023 prepared by Murray & Associates which includes a Landscape and Design Statement for the proposed development. We also refer the Council to the *Site Layout Plan – Focused View* (Dwg No. 1872_PL_P_01) and Landscape Specifications.

In response to Item 9(B) we refer the Council to the *Response re. Planning Further Information and Soft Landscape Plan RFI Stage SDCC Reg. Ref. SD22A/0457* (Dwg. No. 1872_PL_P_04), prepared by Murray & Associates, providing planting details for the proposed development.

In response to Item 9(C) we refer the Council to *Response re. Planning Further Information Request* dated June 2023 prepared by Murray & Associates and following drawings, which provide full landscape details for the proposed development:



- Landscape Details (Dwg. No. 1872_PL_D_01).
- Landscape Sections (Dwg. No. 1 1872_PL_S_01).
- Landscape Sections 2 (Dwg. No. 1872_PL_S_02).
- Landscape Sections 3 (Dwg. No. 1872_PL_S_03).
- Contiguous Elevations 1 (Dwg. No. 1872_PL_E_01).
- Contiguous Elevations 1 (Dwg. No. 1872_PL_E_02).
- Contiguous Elevations 1 (Dwg. No. 1872_PL_E_03)

In this context we note the response confirms that,

“Additional SUDS, swales and bio-retention trees pits are not appropriate for this development and will not provide any additional benefit to the site or surrounding landscape.”

In response to Item 9(D) we refer the Council to the *Response re. Planning Further Information* dated June 2023 prepared by Murray & Associates, which confirms that,

“All existing green infrastructure is retained. Out of over 1000 trees only 34 no. are to be removed due to the development. These trees are going to have low impact on the overall scheme and 395no.additional trees are proposed. The impacts on the green infrastructure are only positive as the areas are enhanced with high biodiversity tree species and improving the existing fairway grass lawn to a wildflower meadow and short-cut wildflower mixtures that are higher in biodiversity. Tree and shrub areas will be connected with the proposed tree canopies which will create corridors necessary for the native wildlife.”

In response to Item 9(E) we refer the Council to the *Response re. Planning Further Information* dated 28th June 2023 prepared by Murray & Associates, which confirms that,

“The Cemetery has minimal areas of impermeable materials, all the storm water will go into the ground and providing any additional SuDs measures won’t benefit the water retention of the proposed development”.

In response to Item 9(F) we refer the Council to the *Response re. Planning Further Information* and to Section 3.0 of the *Landscape Design Statement and Green infrastructure Plan, RFI Stage SDCC Reg. Ref. SD22A/0457*, dated June 2023 prepared by Murray & Associates.

2.10 ITEM 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:

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



2.10.1 Applicant's Response

In response to Item 10 we refer the Council to the *Response re. Planning Further Information and Landscape Architect's Maintenance and Management Plan, RFI Stage SDCC Reg. Ref. SD22A/0457*, dated June 2023 prepared by Murray & Associates.

2.11 ITEM 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 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."*

2.11.1 Applicant's Response

In response to Item 11 we refer the Council to Section 4.0 of the Response prepared by Cronin and Sutton Consulting Group and associated drawings.

2.12 ITEM 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.”*

2.12.1 Applicant’s Response

In response to this Item, we refer the Council to the *Response re. Planning Further Information and Citywest Cemetery Arboricultural Method Statement, RFI Stage SDCC Reg. Ref. SD22A/0457*, dated 28th June 2023, prepared by Murray & Associates. We also refer the Council to the *Tree Impact Plan/Tree Protection Plan RFI Stage SDCC Reg. Ref. SD22A/0457* (Dwg. No. 1872_TS_P_02) for further tree protection details.

It is considered that this fully addresses this RFI Item.

2.13 ITEM 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.”*

2.13.1 Applicant’s Response

In response to Item 13(A) we refer the Council to the *Ref SD22A/0457- Request for Further Information (RFI) and Wildlife Aviation Impact Assessment* prepared by Altemar Marine & Environmental Consultancy dated 17th July 2023. It is considered that this fully addresses this RFI Item.

With respect to Item 13(B), we refer the Council to the appended *Glint and Glare Assessment Response to a Request for Further Information SD22A/0457: A Proposed Cemetery at Citywest, Saggart, Co. Dublin*, prepared by Macroworks and Forge Solar Engineering, dated April 2023, which confirms that,

“there will not be any hazardous glint and glare effects upon the identified aviation receptor – Casement Aerodrome, as a result of the proposed roof-mounted solar PV panels.”

It is considered that this response addresses this RFI Item.

2.14 ITEM 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.*
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."

2.14.1 Applicant's Response

In response to Item 14 we refer the Council to Section 5.0 of the Response prepared by Cronin and Sutton Consulting Group and associated drawings. We also refer to the Response and drawings prepared by Verde Environmental Consultants which forms Appendix of the Cronin and Sutton Consulting Group Response.



3.0 DOCUMENTS SUBMITTED WITH THIS RESPONSE

The Response to Further Information is accompanied by the following documentation.

Six copies of the following documents and related drawings are enclosed as part of this *Response to Further Information Request*:

Reports

- Six copies of the following reports/documents are enclosed:
 - Response to *Request for Further Information*, prepared by Tom Phillips + Associates, dated 18th July 2023 (i.e. this report).
 - The *Supplementary Transportation Assessment Report for Saggart/Citywest Cemetery at Gartons Lane, Saggart, Co. Dublin* prepared by NRB Consulting Engineers, dated 30 June 2023 including:
 - *Travel Plan (Mobility Management Plan) RFI Stage (SDCC Reg Ref SD22A/0457)* (Appendix I).
 - *Response re. Planning Further Information request*, prepared by Murray & Associates, Landscape Architecture, dated 28th June 2023.
 - *Landscape Architect's Maintenance and Management Plan, RFI Stage SDCC Reg. Ref. SD22A/0457*, Murray & Associates, Landscape Architecture, dated June 2023.
 - *Landscape Architect's Specifications, RFI Stage SDCC Reg. Ref. SD22A/0457*, Murray & Associates, Landscape Architecture, dated June 2023.
 - *Landscape Architects' Report and Green infrastructure Plan RFI Stage SDCC Reg. Ref. SD22A/0457*, prepared by Murray & Associates, dated June 2023.
 - *Citywest Cemetery Arboricultural Method Statement, RFI Stage SDCC Reg. Ref. SD22A/0457*, Murray & Associates, Landscape Architecture, dated June 2023.
 - *A Glint and Glare Assessment Response to a Request for Further Information SD22A/0457: A Proposed Cemetery at Citywest, Saggart, Co. Dublin*, prepared by Macroworks and Forge Solar Engineering, dated April 2023.
 - The response to *Request for Further Information Proposed Cemetery Development City West, Saggart, County Dublin Planning Ref: SD22A/0457*, dated July 2023, prepared by CS Consulting Engineers.
 - The *Ref SD22A/0457- Request for Further Information (RFI)*, prepared by Altemar Marine & Environmental Consultancy dated 17th July 2023 including:
 - *A Proposed Development (Cemetery) at Citywest, Saggart, Co. Dublin Badger / Fauna Survey* prepared by Dr. Chris Smal B.Sc. Ph.D. MIEEM, dated 26th May 2023 (Appendix I refers).



- A Wildlife Aviation Impact Assessment for a proposed cemetery on the grounds of the Citywest Hotel, Saggart, Dublin 24 dated 17th July 2023, (Appendix II refers).

Drawings

- Six copies of the following drawing, prepared by Murray & Associates, Landscape Architecture:

Dwg. Ref	Title	Scale	Size
1872_PL_P_00	Site Layout – Wider Context – Overall	1:1000	A0
1872_PL_P_00.1	Site Layout – Area A	1:500	A0
1872_PL_P_00.2	Site Layout – Area B	1:500	A0
1872_PL_P_00.3	Site Layout – Area C	1:500	A0
1872_PL_P_00.4	Site Layout – Area D	1:500	A0
1872_PL_P_01	Site Layout Plan – Focussed View	1:500	A0
1872_PL_P_01.1	Landscape detail plan – Ceremony building RFI Stage SDCC Reg. Ref. SD22A/0457	1:200	A1
1872_PL_P_01.2	Landscape detail plan – Car Parking 1 RFI Stage SDCC Reg. Ref. SD22A/0457	1:200	A1
1872_PL_P_01.4	Landscape detail plan – Aquatic Planting RFI Stage SDCC Reg. Ref. SD22A/0457	1:200	A1
1872_PL_P_02	Boundary Treatment Layout RFI Stage SDCC Reg. Ref. SD22A/0457	1:500	A0
1872_PL_P_03	Landscape Masterplan RFI Stage SDCC Reg. Ref. SD22A/0457	1:200	A0
1872_PL_P_04	Soft Landscape Plan RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_P_05	Hard Landscape Plan RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_S_01	Landscape Sections 1 RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_S_02	Landscape Sections 2 RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_S_03	Landscape Sections 3 RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_E_01	Contiguous Elevations 1 RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_E_02	Contiguous Elevations 2 RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_E_03	Contiguous Elevations 3 RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_PL_D_01	Landscape Details RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_TS_P_01	Tree Survey RFI Stage SDCC Reg. Ref. SD22A/0457		
1872_TS_P_02	Tree Impact Plan, Tree Protection Plan RFI Stage SDCC Reg. Ref. SD22A/0457		



- Six copies of the following drawings, prepared by Cronin & Sutton Consulting Engineering:

Dwg. Ref	Title	Scale	Size
CTW-CSC-ZZ-XX-DR-C-102	Proposed Storm Water Layout	1:500	A0
CTW-CSC-ZZ-XX-DR-C-105	Proposed Road Layout	1:500	A0
CTW-CSC-ZZ-XX-DR-C-106	Standard Details	As Shown	A0



4.0 CONCLUSION

We trust that this Response to Further Information in support of this Planning Application addresses the items raised by the Planning Authority in respect of the proposed development.

Please revert back to us should you require further clarification in relation to any aspect of the application and we look forward to favourable decision on this application.

Yours faithfully,

Aoife McCarthy
Associate
Tom Phillips + Associates
Encl./



Appendix A

Request for Further Information, dated 13th February 2023



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



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

Tom Phillips & Associates
80, Harcourt Street
Dublin 2

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

Decision Order Number: 0150	Date of Decision: 13-Feb-2023
Register Reference: SD22A/0457	Registration Date: 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](https://www.sdcc.ie/sites/default/files/2022-04/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 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.

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