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Planning Department,
South Dublin County Council,
County Town Hall Tallaght,
Dublin 24,
D24A3XC

20 March 2024

Re: **Response to SDCC letter of non-compliance in relation to conditions 5 (c) and (d)**

Pl. Ref: **SD22A/0299/C5(c)&(d)**
This is an amendment application to the permitted SHD application TA065.305556

Dear Sir/Madam,

We refer to your letter of non-compliance for conditions 5(c) & (d) dated 9 November 2023.

Please find enclosed our responses and updated drawings to address your comments.

Original grant condition received on 7 Novemeber 2022:

Drainage - Irish Water.
(c) Prior to commencement of development the applicant shall submit to the Planning Authority for written agreement a drawing to clarify where proposed sub station is relative to existing surface water network. The setback distance from any surface water pipe shall be as per the requirements of the Greater Dublin Regional Code of Practice for Drainage Works.

(d) Prior to commencement of development the applicant shall submit to the Planning Authority for written agreement a drawing showing what SuDS (Sustainable Drainage System) are proposed for the development. Examples of SuDS can be found in SuDS Guide on South Dublin County Council Web Site at sdcc-suds-explanatory-design-and-evaluation-guide.pdf

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Further comments from SDCC letter of non-compliance dated 9 Novemeber 2023:

Water Service Report: Non-Compliance C5(c):

1.1 Water Services are not satisfied that Condition C5c has been complied with because the setback distance of the substation from all the drainage lines is not clear.

The applicant is required to:

1.2 Dimension the distance from the ESB substation to the pipeline, Mhs S3.1 to S3.2. The distance from the building to the outer limit of pipe (not centre line) is required to be a minimum of 3m.

Water Service Report: Non-Compliance C5(d):

1.1 Water Services are not satisfied that Condition C5d has been complied with because the Sustainable Urban Drainage features (SuDs) requested are not clearly provided. The Surface Water Design Report 221.226-RPO- 05 supplied as additional information states that there is a reduction in the area of green roof to make room for the proposed top plant rooms. There are also two new impermeable ESB substations proposed. There are no clear details on any SUDs to address the reduction in green roof area and the additional impermeable ESB substation areas.

The applicant is required to:

1.2 Provide drawings showings proposed SuDs features in plan and cross section. Provide a report detailing the area in m2 of each different surface type (top plantroom areas and esb substations) and their corresponding run off coefficients. Provide details of attenuation required due to these changes, and detail the new SUDs features that will provide this attenuation.

In light of the above, it is considered premature for the planning authority to agree the subject compliance submission until Condition 5(c) and (d) are satisfactorily addressed. The applicant is advised to carefully consider the comments provided in the water services report and to liaise directly with the Water Services section prior to submitting a revised submission.

BM
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BMCE Response

Condition (c)

We refer to the attached plan drawing CWD-BMCE-ZZ-ZZ-DR-C-1038 which shows the drainage surrouding the ESB substations within catchments A and B. Dimensions are included which demonstrate that the minimum 3m clearances from the ESB substations to the face of the surrounding pipes are achieved.

Please note that the manhole references have changed since the original compliance submission. The nearest surface water manholes to the substations are SWMH10, SWMH8 and SWMH30.

Condition (d)

Please refer to the updated SuDs layout plan drawing CWD-BMCE-ZZ-ZZ-DR-C-11300 (Revision PL2) and details drawings C-1038, C-1039, C-12300 and C-12320 which show:

- The SuDs features implemented accross the site which include: permeable paving, bio-retention tree pits, extensive green roofs, petrol interceptors and attenuation tanks.
- The different impermeable and permeable surface types and their approximate areas.

There is an uplift in impermeable surface areas as a result of the rooftop plantrooms, PV panels and ESB substations. Their approximate areas and resulting increase in attenuation storage requirements are outlined below. A runoff coefficient of 0.95 was applied for these elements.

	Original Planning Application ABP 305556		Amendment planning application SD22A/0299		Additional attenuation storage required (m^3)
Catchment	Green roof Area (m^2)	Impermeable roof area (m^2)	Green roof Area (m^2)	Impermeable roof area (m^2)	
A	3103	345	2792	656	3
B	900	100	770	230	1
C	526	59	467	118	3
D	459	51	403	107	2

The attenuation tanks serving blocks A-D (catchments A and B) have been enlarged over and above the original planning application to cater for the increased storage requirements. The catchment A tank was increased from 420 to 455m^3. The catchment B tank was increased from 80 to 122m^3 [a].

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[a] The attenuation storage for catchment B was previously increased to accommodate the reconfiguration of the roads at Carrigmore Green required as part fo ABP305556 SHD grant Condition 2.

Yours sincerely,

Brian O'Neill
Chartered Engineer
For Barrett Mahony Consulting Engineers

cc. Ardstone – Keith O'Brien
MDO Architects – David O'Connell, Patrick King
Lafferty PM – Liam Howlin, James O'Sullivan
DBCL Planning Consultants – Declan Brasil