



# IMAGINE DUNDRUM

Community Placemakers CLG

OUR VILLAGE, OUR COMMUNITY

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Decisions Section  
Planning Department  
County Hall  
Marine Road  
Dun Laoghaire  
County Dublin

10/7/25

**Case No:** D25A/0462/WEB

**Address:** Lands at the existing car park site to the rear of Main Street, (Nos. 8, 11, 15/15A, 16/17 and Former Mulvey's Hardware premises), and rear of Holy Cross Church and Parochial House, Main Street, Dundrum, Dublin 14.

**From:**

Imagine Dundrum Community Placemakers CLG  
c/O Jim Colgan, Company Secretary  
30 Ashlawn, Ballinteer Rd, Dublin 16

Dear Sir/Madam,

This submission from Imagine Dundrum refers to **Planning Application D25A/0462/WEB** to Dun Laoghaire Rathdown County Council for the following development:

*The development will consist of an aerial delivery hub consisting of 1 no. single storey storage and ancillary office cabin container, boundary treatments in the form of perimeter fencing, and all associated site works necessary to facilitate the development. Planning permission is being sought for a temporary period of 5 years.*

**Location/address**

Lands at the existing car park site to the rear of Main Street, (Nos. 8, 11, 15/15A, 16/17 and Former Mulvey's Hardware premises), and rear of Holy Cross Church and Parochial House, Main Street, Dundrum, Dublin 14.

## A: GENERAL ISSUES AND CONCERNS

### 1. The scope of this planning application for a physical building includes the activity that will operate from that building

This planning application must be adjudicated on the basis not only of the physical hub or building which is the subject of the application, but also of the impacts of the activity and purpose for which the structure will be used. This is accepted by Downey, as the content of the Planning Statement relies on arguments in favour of aerial drone activity to support the case for planning permission (*Downey Planning Statement, Section 4: Proposed Development, p6*)

It is in our view a fundamental flaw in this planning application that virtually no information is provided in respect of the drone activity that will be carried on at the aerial delivery hub and minimal information on the activities to take place in the cabin/hub. We believe this to be a fatal flaw, such as to render the application void from the start. Nonetheless, we have provided observations on the planning application as it stands.

### 2. The absence of regulation or guidance to underpin a Local Authority planning decision should render this Planning Application void

Imagine Dundrum acknowledges the value of and need for technological innovation and opening up of new businesses based on innovation. However, we believe that the interests of citizens, neighbourhoods must always be the first priority of planning policy.

In their *Drone and Urban Air Mobility Strategy for Dublin City Council*, the Council refers to the absence of regulatory compliance in respect of drones and underlines the need for:

*Work within the Local Government sector and central government to agree common approaches to address how low level air space is managed (i.e. landing and take-off zones, define specific areas where drone activities are permitted or restricted, and infrastructure required to support. There will be a need to develop planning guidelines (our underline) to support zone infrastructure in new buildings and developments.*<sup>1</sup>

In their Planning Statement, the absence of appropriate regulation is also acknowledged by Downey:

*Upon a considered review of all presiding planning policy from local to national level over current 'emerging technologies' such as aerial delivery by drone, including the presiding Planning and Development Act and associated Regulations (as amended) it is submitted that drone operations and associated launching facilities are currently not sufficiently addressed by current planning policy at any level...*<sup>2</sup>

The Irish Aviation Authority is currently the licencing body for commercial drones and its role in this regard is recognised. However, the IAA licenses mechanical safety but does not regulate a range of planning matters outlined below in this submission.

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<sup>1</sup> Dublin City Council: Drone and Urban Air Mobility Strategy for Dublin City Council (<https://www.dublincity.ie/residential/travel-and-transport/drone-unit/drone-and-urban-air-mobility-strategy-2024-2029-overview>)

<sup>2</sup> Downey: Planning Statement, June 2025

**3. 'Alternative considerations' as proposed by Downey in this Planning Application are neither relevant or appropriate to the planning decision that requires to be made by Dún Laoghaire Rathdown County Council.**

In their Planning Statement, Downey proposes that in the light of the absence of planning regulation, 'other considerations' should apply, proposing that the 'other considerations' include the IAA authorisation under LUC, and the (unsupported) claim that drone delivery services will aid the transition to a greener and more efficient economy.

Imagine Dundrum contends that these 'other considerations' have no relevance to this planning application and cannot substitute for the absence of planning policy or regulation to govern the use of commercial drones in built up urban areas, and the protection of the interests of residents in such areas.

**Proposal 1**

***The development of an aerial delivery hub at the proposed location is inappropriate and premature, given the complete absence of planning guidelines to ensure the public interest and protect the rights of residents in respect of aerial drone activity in their neighbourhood.***

***The absence of regulations or policy guidelines governing commercial drones means that there is no basis on which this planning application can be adjudicated by the Planners in Dún Laoghaire Rathdown and should therefore result in it being rejected.***

**B: INTRUSION ON THE RIGHT OF CITIZENS TO THE PEACEFUL ENJOYMENT OF THEIR HOME**

**4. (a) Noise Pollution**

The likely noise pollution from the drone activity is a most serious concern for local people living in the vicinity of the proposed hub. A significant and overarching concern in respect of this Planning Application is that it fails to address or provide any information on the noise levels that could be expected from drones. However, the assertion is made by Manna quoted in an article in the Irish Times states that the sound emitted from drones at 80m is comparable to normal conversation:

*'Leading experts in acoustics science from Trinity College assessed our aircraft and found that while cruising at 80m, they emit just 57 decibels – quieter than a conversation – and only for around 10 seconds as they pass overhead,'*<sup>3</sup>

This reference to pending technological advances in drone design does not address the core problem of drone noise. Noise pollution concerns arise from noise levels at the point of ascent and descent, rather than at the highest point of flight. It is at this very local level that drone noise will be likely to be most disruptive in a built up residential area. The statement quoted above also fails to recognise the impact of the character and quality of noise, which is at least as significant as the decibel rating.

Research indicates that drone noise cannot be compared to traffic noise – 'drone sound is very tonal, with a mixture of hums and whistles caused by the rotating blades and motors'<sup>4</sup> The research

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<sup>3</sup> <https://www.irishtimes.com/business/2025/07/09/drone-delivery-company-manna-expects-approval-for-quieter-aircraft-within-months/>

<sup>4</sup> Institute of Acoustics; Briefing Note – Drones – July 2022  
[https://www.ioa.org.uk/sites/default/files/briefing\\_note\\_-\\_noise\\_from\\_drones\\_final\\_feb\\_22.pdf](https://www.ioa.org.uk/sites/default/files/briefing_note_-_noise_from_drones_final_feb_22.pdf)

suggests that the frequency and tonal quality of drone noises are more likely to cause stress than any other common urban sounds, even if the decibel level is similar.<sup>5</sup>

The Institute of Acoustics proposes that managing or regulating drone noise is likely to involve a combination of the noise generated by the drones, how often they will be flying, the time of day and day of the week the flights occur and their resulting noise impact – none of which is known in respect of this Planning Application.

The American technology company, Acentech, writing in 2020, sets out the technical reasons why drone noise is problematic, and concludes that ‘all of these mechanisms combine to produce what people perceive as a ‘buzzing’ similar to a swarm of bees.’<sup>6</sup>

It should also be noted that the proposed location of the hub is adjacent to the location of an ice-skating rink which has planning permission for the coming three years, for the months from November to end January, and which is heavily used by children and adults, and which itself generates considerable noise.

#### **4 (b) Noise Pollution and Noise Nuisance: Dún Laoghaire Rathdown County Development Plan 2022-2028**

The County Development Plan 2022-2028 sets out conditions relating to noise nuisance and noise pollution.<sup>7</sup> It also sets out the definition of noise nuisance in s108 of the EPA Act 1992:

‘Any noise which is so loud, so continuous, so repeated, of such duration or pitch, or occurring at such times as to give reasonable cause for annoyance to a person or premises in the neighbourhood’. It is our view that drone noise, as described in research as well as the experience of residents living in areas where drone flights operate currently, meets the criterion to be regarded as noise nuisance/noise pollution.

### **5. Other potential impacts**

Other potential impacts that would require to be regulated in densely populated areas include the control of drone flight paths, privacy and safety considerations posed by low-altitude drone flights over private properties, GDPR concerns, The impact of drones on wildlife must also be measured by planners.

We note that South Dublin County Council, in its response to a Planning Application on behalf of MANNA DRONES, requests a significant range of additional information including a Noise Impact Assessment, operational parameters, operational hours and the frequency of drone movements, stating that this information must be provided to assess the suitability of the proposed use within the subject zoning designation and that ‘this information is essential for a thorough evaluation of the potential impact on surrounding residents.’<sup>8</sup>

### **6. Resident complaints**

It is unacceptable that in the absence of guidelines or policies regulating commercial drone flights, persons affected must rely on complaints to local authorities, when those authorities have no policy or guidelines against which to test the validity of a complaint. Reliance on Local Authority

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<sup>5</sup> Kawai, C, Jaggi, Jonas, et al. Short-term noise annoyance towards drones and other transportation noise sources: A laboratory study, 2024), <https://pubmed.ncbi.nlm.nih.gov/39404357/>

<sup>6</sup> Acentech, Drone Noise – a New Challenge in Acoustics, 2020.  
<https://www.acentech.com/resources/drone-noise-a-new-challenge-in-acoustics/>

<sup>7</sup> County Development Plan 2022-2028, Ch.12. Development Management 12.9.2 p293

<sup>8</sup> Planning reference SDCC SD24A/0292W

enforcement may be of limited use in the absence of regulations which the company would be required to abide by.

## **PROPOSAL 2**

*In the light of the potential intrusion of commercial drones on the peaceful enjoyment of their homes by residents in the densely populated area adjacent to the proposed location of the hub which is the subject of this Planning Application, the Council is asked to refuse planning permission.*

### **THE PROPOSED BUSINESS AND BUSINESS LOCATION IS IN BREACH OF KEY ASPECTS OF THE DUNDRUM LOCAL AREA PLAN**

#### **7. The proposed structure is unacceptable in its closeness to key buildings in the Dundrum Architectural Conservation Area and Holy Cross Church, a Protected Structure.**

##### **Holy Cross Church and Parochial House**

The Dundrum Local Area Plan sets out a Development Framework of Guiding Principles for the Old Dundrum Shopping Centre Area. Among the Guiding Principles is the following:

‘To retain the view of Holy Cross church spire when travelling southwards along Main Street from the southern edge of the old Shopping Centre site’<sup>9</sup>

While this provision may refer to physical building height in the vicinity of Holy Cross Church, it must be interpreted in a modern context. The continuous presence of drones in the skyline close to the Church would represent a real and present threat to the uninterrupted view of Holy Cross Church spire, contrary to the intent of the LAP provision.

Further, the Dundrum LAP requires that ‘proposed heights along Main Street are sensitive to the original streetscape, in keeping with its character, scale and ACA status’.<sup>10</sup> These provisions must also be interpreted in the light of emerging activities that have the same or even more impact on an ACA as a permanent building would have. As with the Church spire, the continuous presence of drones flying above Main Street represent an unacceptable and intolerable intrusion on the character and scale of Main Street.

Holy Cross Church is also an active location of religious services, where there is a reasonable expectation of quiet and respect. It must also be stressed that the Parochial House is a home, and given its closeness to the proposed hub, the commercial flight activity from the hub would represent a potentially intolerable intrusion.

##### ***Holy Cross Church is a protected structure***

Holy Cross Church is designated by Dún Laoghaire Rathdown as a Protected Structure. It is unacceptable that drone activity takes place so close as to create a risk of damage to this structure. This is an unacceptable risk, in our view, and sufficient grounds to refuse planning permission.

##### **The zoning of the proposed site**

The proposed location of the drone hub falls within the MTC zoning in the Dundrum Local Area Plan. Downey argues that the proposed structure and associated activity ‘can be considered as an ancillary use to the operation of the surrounding enterprise developments and contributes positively to the CDP vision and objectives.’ (Downey, p7). Imagine Dundrum challenges this view. The aerial delivery hub cannot be considered as falling within the list of permitted uses under the

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<sup>9</sup> DLAP 2023, 2.8.2.4 p21

<sup>10</sup> DLAP 2-23, p23

MTC land zoning. It is in our view both a transport facility and an industrial facility, and as such more suited to an industrial estate setting.

### **The limits of the IAA certification**

As already noted, IAA authorisation does not regulate the issues raised in this submission. We note in particular the document titled *UAS Operations Specifications*, which forms part of the applicant's Planning Statement. This document indicates that the operator, MANNA DRONES IRELAND, has the privilege to authorise operations without prior approval of the IAA that fall within a type of activity already performed by the UAS operator, subject to certain specifications relating to matters such as insurance, number of aircraft operating from one base at a time etc.

In other words, IAA authorisation has no specific regard to Dundrum Old Shopping Centre and its environs as a location for a commercial drone operation.

### **OVERALL CONCLUSIONS AND RECOMMENDATION**

Imagine Dundrum recognises that commercial drones have commercial potential and may have other positive outcomes for new kinds of service. However, it is our view that harnessing this potential cannot be achieved except in the context of a well regulated environment that protects the interests of citizens and residents. Affording this protection is the primary duty of the planning system in our view.

Government oversight is lagging behind. If Local Authority planners were to facilitate poorly regulated commercial drone activity, this may hold back rather than advance the development of commercial drone activity. This view is supported by a statement in the Dublin City Council Drone and Urban Air Mobility Strategy for Dublin City Council:

*'Work within the Local Government Sector and central government to agree common approaches to address how low-level airspace is managed (i.e. Landing and take-off zones, define specific areas where drone activities are permitted or restricted, and infrastructure required to support). There will be a need to develop planning guides to support drone infrastructure in new buildings and developments'*<sup>11</sup>

### **PROPOSAL 3**

**That DLR refuse planning permission based on all the grounds set out in this submission. The Council might consider commissioning independent research to assist it (and other Councils) in contributing to regulatory guidelines for this and future commercial drone activity.**

**Should the Council intend to give consideration to the application having regard to the detail of the issues raised, we ask that the applicant be required to submit comprehensive information that would enable the Council planners to carry out a thorough examination in respect of all the issues raised here.**

**Should the Council be minded to approve this application, we question whether planning permission of five years should be granted. It is our view that a five- year approval is too long, in respect of a development where significant technical developments could be expected, which could either add to public risk, such as speed, weight-bearing capacity, or potential to mitigate such risk (in which case the mitigation would be built into revised planning requirements). These reasonable expectations would point to a limit of 1/2 years for a planning application in circumstances where the operating conditions are likely to be changing quickly.**

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<sup>11</sup> Dublin City Council: *Drone and Urban Air Mobility Strategy for Dublin City Council: 2024-2029*, p14 (<https://www.dublincity.ie/residential/travel-and-transport/drone-unit/drone-and-urban-air-mobility-strategy-2024-2029-overview>)

We would also suggest that should the council be minded to approve this application the project should be monitored independently from day 1, with comprehensive annual reporting to DLR, the public and Manna, on all the aspects of drone activity in the area including the number of flights, where and when, noise levels at take-off and landing, average heights, products delivered (weight and shape/size) etc.