



**THORNTON O'CONNOR**  
TOWN PLANNING

**Planning Application**

**In respect of a Warehouse Development at**

**Brownsbarn, Citywest Campus, Dublin 24**

**Submitted on Behalf of**

**Exeter Ireland Property IV B Limited**

June 2021



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Principal Planning Officer  
Planning Department  
South Dublin County Council  
County Hall  
Tallaght  
Dublin 24

Monday, 21<sup>st</sup> June 2021

Dear Sir/Madam

**Re: APPLICATION FOR PERMISSION FOR THE PROVISION OF A 2 NO. WAREHOUSE DEVELOPMENT AT A SITE AT BROWNSBARN, CITYWEST CAMPUS, DUBLIN 24**

## **1.0 INTRODUCTION**

### **1.1 Application for Development**

Exeter Ireland Property IV B Ltd<sup>1</sup> has retained Thornton O'Connor Town Planning in association with Kavanagh Burke Consulting Engineers<sup>2</sup>, JBA Consulting<sup>3</sup>, Historic Building Consultants<sup>4</sup>, Digital Dimensions<sup>5</sup>, Stephen Reid and Consulting Traffic and Transportation<sup>6</sup>, Axiseng<sup>7</sup>, Arbor Care Limited<sup>8</sup> to prepare this application for permission for development to provide a 2 No. warehouse development at Brownsbarn, Citywest Campus, Dublin 24. Trafficco Road Safety Engineering<sup>9</sup> were also appointed to carry out an independent Stage 1 Road Safety Audit.

The lands are bounded to the south by the N7 Naas Road, to the north and west by the National Distribution Centre and to the east by Brownsbarn Drive and the Royal Garter Stables, a Protected Structure (RPS Ref. 261).

### **1.2 Summary of the Proposed Development**

The development will comprise the construction of 2 No. warehouses with ancillary office and staff facilities and associated development as follows: Unit 1 will have a maximum height of 16.35 metres with a gross floor area of 8,156 sq m including a warehouse area (7,397 sq m),

<sup>1</sup> No. 88 Harcourt Street, Dublin 2

<sup>2</sup> Unit G3, Calmount Park, Ballymount, Dublin 12

<sup>3</sup> Unit 8, Block 660, Greenogue Business Plaza, Greenogue Business Park, Rathcoole, Dublin,

<sup>4</sup> Old Bawn, Old Connaught, Bray

<sup>5</sup> No 1, Rathmines Road Upper, Rathmines, Dublin 6

<sup>6</sup> Estuary House, New Street, Malahide, Co. Dublin.

<sup>7</sup> No. 47 Mount Street Upper, Dublin 2

<sup>8</sup> Unit 1A, Crossagalla Enterprise Centre, Ballysimon Road, Limerick

<sup>9</sup> No. 32 Manor Street, Dublin 7



ancillary office areas (362 sq m) and staff facilities (397 sq m); and Unit 2 will have a maximum height of 15.35 metres with a gross floor area of 5,990 sq m including a warehouse area (5,031 sq m), ancillary office areas (536 sq m) and staff facilities (423 sq m).

The development will also include: vehicular access/egress routes to the subject site via the existing roundabout and access road; plus alteration to the existing access arrangements to the subject lands to facilitate safe traffic flow to/from the proposed facilities; pedestrian access; 109 No. car parking spaces; bicycle parking; HGV Parking; HGV yards; level access goods doors; dock levellers; access gates; signage; hard and soft landscaping; lighting; boundary treatments; ESB substation; sprinkler tanks; pump houses; and all associated site development works above and below ground.

### 1.3 Purpose of this Report

The purpose of this Planning Report is to provide an overview of the following:

- Site Location, Context and Description                      Section 2.0;
- Rationale for Proposed Development                      Section 3.0;
- Planning History    Section 4.0;
- Detailed Development Description                          Section 5.0;
- Planning Context    Section 6.0;
- Planning Administration                                        Section 7.0; and
- Conclusion    Section 8.0

### 1.4 Appropriate Assessment

This application was screened for Appropriate Assessment by JBA Consulting. Having regard to the location of the subject site at a distance from any Natura 2000 sites, the nature and extent of the development (2 No. warehouses, ancillary offices, staff facilities, HGV loading areas, and ancillary car parking) the screening report concludes that:

*'Following this initial screening of the proposed development at Brownsbarn, Citywest, Co. Dublin, it can be concluded that significant impacts are not anticipated via surface water, groundwater, or land/air pathways on the following Natura 2000 sites:*

- Rye Water Valley/Carton SAC (001398)
- Glenasmole Valley SAC (00120)
- Red Bog, Kildare SAC (000397)
- Wicklow Mountains SAC (002122)
- Poulaphouca Reservoir SPA (004063)
- Wicklow Mountains SPA (004040)
- North Dublin Bay SAC (000206)
- South Dublin SAC (000210)
- North Bull Island SPA (004006)
- South Dublin Bay and River Tolka Estuary (004024)





*If any changes occur in the design of these works, a new Screening for Appropriate Assessment is required.'*

The Appropriate Assessment Screening is submitted as a standalone document with this planning application.





## 2.0 SITE LOCATION, CONTEXT AND DESCRIPTION

### 2.1 Site Location

The greenfield subject site which has an area of 4.04 Ha is located to the north of the N7 national road (Naas Road) and to the west of the Citywest (N82) junction. The site is accessed via this existing road network. The National Vehicle Distribution Centre borders the site to the north and west. It is noted that the Camac River lies to the west of the subject site. A map of the site subject is provided below at Figure 2.1.



Figure 2.1: Map Showing the Location of Subject Lands as shown in Red (Indicative Only).

Source: Myplan.ie annotated by Thornton O'Connor Town Planning, 2021.

### 2.2 Site Context

The surrounding area is primarily commercial in nature and is influenced by the N7 primary road from Dublin to Limerick (Naas Road) to the south and the Casement Aerodrome located further to the north.

There are a number of business parks located within the vicinity of the subject lands, most notably Baldonnell Business Park to the west and Citywest Business Campus to the south of the N7. Greenogue Business Park is located further west whilst Kingswood Business Park is located to the north-east of the subject site. The Royal Garter Stables (commonly known as Brown's Barn), a Protected Structure is located to the east of the subject lands.

A map showing the surrounding context of the site is provided at Figure 2.2.





Figure 2.2: Aerial Photograph identifying the location of the Subject Site.

Source: Google Maps, as annotated by Thornton O'Connor Town Planning, 2021.

## 2.2 Site Description

The 'Enterprise and Employment' zoned lands are greenfield in nature. The site is not located within an architectural conservation area. Images of the subject lands are provided below for reference.







Figure 2.3 -2.6: Images of the Subject Lands with Insert identifying the Direction of the Viewpoint.

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2021.



### 3.0 RATIONALE FOR DEVELOPMENT

Given recent market uncertainty in relation to the long term impacts of Brexit and separately the growth of E-commerce, (which may continue to increase as a result of the prevailing Covid-19 Pandemic and associated preferences for online retail), there is a high demand for warehouse capacity in Ireland. This has required developments of scale which provide for an expansion of available commercial warehousing floor area and increased floor to ceiling heights in order to accommodate the logistical management of large collections of goods and bulk objects. The import and export of goods has shifted in recent years to a more dynamic and responsive supply chain. This has seen the growth of trends such as next day delivery and just in time supply chain movements. The vast and complex nature of freight logistics requires capacity to keep pace with supply and demand.

#### 3.1 Research Demonstrates That There Is A Demand Within the Industrial and Logistics Sector for Suitable Warehouse Floor Area

The *Dublin Industrial Market Report – Q4 2020* published by Jones Lang La Salle<sup>10</sup> provides an insight into the impacts of Covid-19 on the Industrial and Logistics market. It outlines that:

*'Despite the Covid-19 crisis, there is evidence that rental levels have grown by 5% in 2020 due to the heightened demand for space and the limited amount of supply coming to the market.'* [Our Emphasis].

Research carried out by Savills in December 2020<sup>11</sup> corroborates these findings, noting that:

*'Occupier demand for Industrial and Logistics space bounced back significantly after the first lockdown and interest continued into Q3 with 376,680 sq m of requirements recorded by Savills between July and Sep compared with just 107,500 sq m recorded between March and May. There has been a significant increase in enquiries for units larger than 1,000 sq m with 49 enquiries in September compared to only 25 in July.'* [Our Emphasis].

Furthermore, the *Dublin Industrial Market Report– Q4 2020* highlights that:

*'After a slow Q2, industrial take-up volumes strengthened in the second-half of 2020. The continued public health crisis and Brexit have heightened the need to elevate chain risk mitigation and source diversification to create greater resilience in future crises.'*

The proposed development will provide 12,535 sq m of Warehouse Floor Area (overall GFA 13,886) at an excellently accessible site in South Dublin. The *Dublin Industrial Market Report* emphasises that the:

*'Lack of existing industrial stock, especially for large, modern spaces, continues to be an issue in the market. There are several large-block industrial facilities in the pipeline, but*

<sup>10</sup> <https://www.jll.ie/en/trends-and-insights/research/dublin-industrial-market-report-q4-2020>

<sup>11</sup> <https://www.savills.ie/research-and-news/research.aspx?rc=Ireland&p=&t=&f=date&q=&page=2>





*temporary construction site closures will delay completion dates and create further pressure on the supply and demand imbalance.'*

The lack of available industrial buildings is also reported by Savills, who stated in December 2020 that:

*'There are nine buildings which total to 93,570 sqm currently under construction across six developments in Dublin, three of which are already committed. It is anticipated that the majority of this space will be taken up prior to completion.'*

Given the current undersupply of such floor areas, Savills conclude that:

*'Based on current levels of demand and the current all-time low vacancy rate, the majority of this space will likely be taken up prior to completion.'* [Our Emphasis].

The development subject to this planning application has the opportunity to contribute high quality, contemporary warehouses with ancillary offices and staff facilities on a site located in South West Dublin that is excellently served by existing road networks.

We note that the Dublin Industrial & Logistics MarketView, Q4 2020 highlights that the:

*'Transactional activity in the industrial & logistics sector during Q4 2020 was primarily focused on the Dublin South West (N7) and Dublin North East (M1) corridors, which respectively accounted for 62% and 13% of quarterly take-up in Dublin in the quarter.*

*For the year as a whole, the Dublin South West (N7) district accounted for the largest proportion of activity in this sector (46%)'*

Savills anticipate continued growth in the Industrial market and highlight that:

*'despite Covid-related headwinds, the Industrial and Logistics market has remained relatively robust. Looking at the market fundamentals Ireland has a growing population and a return to annual growth in personal consumption expenditure has been forecasted by the Central Bank for 2021. As such we would expect to see the recovery continue into the new year.'* [Our Emphasis].

In addition, Savills highlight that:

*'the greatest challenge to take-up was not Covid but a lack of suitable space for potential occupiers.'* [Our Emphasis].

The 2 No. proposed warehouses have been designed having regard to the evolving needs of future end occupiers including the need for internal clear heights of 12 m.

The *Dublin Industrial Market Report* presents a similar outlook for the Industrial Market for 2021 outlining that:





*'The global public health crisis and the ending of the Brexit transition period changed how Ireland utilised real estate. The crisis of 2020 demonstrated the importance of in-country storage and last-mile logistics to mitigate potential supply chain delays.'*

It is also acknowledged that:

*'the growth in e-commerce has underpinned the need for space while (the) pipeline remains constricted.'*

Furthermore, the *Dublin Industrial & Logistics MarketView, Q4 2020*<sup>22</sup> reports that:

*'Now that there is better clarity on Brexit and we are likely to remain in lockdown for the foreseeable future, the likelihood is that additional requirements will manifest during Q1 2021.'* [Our Emphasis].

This is further corroborated in a recent Irish Times article entitled *Investors eye purchase of €78m worth of Dublin logistics assets*<sup>23</sup> dated 3<sup>rd</sup> March 2021 which states:

*'With the Covid-19 pandemic serving to accelerate the growth of e-commerce and with traditional supply chains under pressure as a result of Brexit, the competition among international investors for industrial and logistics assets in Dublin and beyond shows no sign of relenting.'*

The CBRE *Dublin Industrial and Logistics MarketView Q1 2021*<sup>24</sup> reports a *'Significant Increase in Demand for Industrial Property from Both Occupiers & Investors Alike'*. The report continues to outline that:

*'Transactional activity in the industrial & logistics sector during Q1 2021 was primarily focused on the Dublin South West (N7) and Dublin North (M2) corridors, which respectively accounted for 45% and 39% of quarterly take-up in Dublin in the quarter'*

It is evident from recent research of the Industrial and Logistics Market as outlined above that the trend for continuing demand for industrial floorplates of appropriate scales will continue for the foreseeable future. We submit that the development subject to this application will contribute to the delivery of high quality warehousing in this area of South West Dublin.

### **3.2 The Subject Lands are Excellently Located in Close Proximity to National and Regional Road Networks**

The Citywest Business Park is *'home to over 200 indigenous and world-wide companies, this unique environment provides the perfect setting for business to thrive which has resulted in its reputation*

<sup>22</sup> CBRE Ireland Dublin Industrial Logistics MarketView Q4 2020.pdf (lnwd.net)

<sup>23</sup><https://www.irshtimes.com/business/commercial-property/investors-eye-purchase-of-78m-worth-of-dublin-logistics-assets-1.4499228>

<sup>24</sup> [Dublin Industrial and Logistics MarketView Q1 2021 | CBRE](#)





as a *global centre of excellence*<sup>35</sup>. In addition, the subject lands are located in close proximity to Baldonnel Business Park to the west and Kingswood Business Park to the north-east which presents a large amalgamation of industrial, logistics, manufacturing and employment lands in south-west Dublin. The subject lands are also located to the south of the Casement Aerodrome (Baldonnel) which is a large employer within the south Dublin region.

The N7 Naas Road is one of the most important transport corridors between Dublin and the south-west resulting in the subject lands being strategically located for the movement of goods and materials to their respective supply chains. This location is also within 10 minutes travel of the M50 ring road, which provides regional access to the Greater Dublin Area and the Airport and Dublin Port.

The location of the subject lands near to a junction of the M7 provides abundant regional access to the national road network. This level of access allows for the movement of goods to and from the proposed warehouse structures in a sustainable and efficient manner which can respond to supply chain demand, e-commerce and other factors.

The subject lands are well placed to accommodate high quality warehousing facilities that are attractive to the Industrial and Logistics Market who seek strategically located developments that can meet their needs.

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<sup>35</sup> Citywest - Home



#### 4.0 PLANNING HISTORY

##### 4.1 Overview of Relevant Planning History of Subject Site

A search of the South Dublin County Council online planning search does not record any planning applications at the subject site.

##### 4.2 Overview of Relevant Planning History of Nearby Sites in Baldonnell Business Park

The South Dublin County Council online search facility details a number of relevant industrial warehouse developments in close proximity to the subject lands in the Baldonnell Business Park. It is also noted that there are 2 No. applications pertaining to lands to the east of the subject site. The most relevant application sites are identified on the aerial photograph below.



Figure 2.1: Aerial Photograph identifying Relevant Planning Applications in the Immediate Vicinity.

Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021.





4.2.1 Site to the North-West of the Site (Identified as Site No. 1 on the Aerial Photograph at Figure 2.1)

Reg. Ref	SD15A/0309 ABP Ref.: PL.o6S.246392
Applicant	MLEU Dublin Limited
Address	Moneenalion Commons Upper, Baldonnel Business Park, Dublin 22
Description of Development	Demolition of existing pre fab building of 39.4 sq m. The construction of <b>3 units for light industrial and logistics/warehouse</b> use ranging in size from 10,837 sq m to 10,967 sq m (with option to subdivide subject to tenant requirements). The GFA of the development is c 32,711 sq m including 1,569 sq m of ancillary office floor space. The development is served by service yards and 329 car park spaces and 73 bicycle spaces. The maximum parapet height of the units is 12.65 m. Access to the site is from Barney's Lane and Clonlara Road and will include new access bridge to Unit B & C. Development to include attenuation measures including detention basin located to the south east of the site. The development also includes 2 substations with internal switch rooms and plant, all site development works, landscaping and associated boundary treatment and all other ancillary works.
SDCC Decision	Refuse Permission
Decision Date	7 <sup>th</sup> March 2016
First Party Appeal	Grant Permission
Decision Date	13 <sup>th</sup> April 2017

The Planning Officer in their Report sets out that the main issues for assessment are:

*'zoning, council policy, design statement, visual impact, access and parking, landscaping services and drainage, aviation, environmental health issues, archaeology, SEVESO, waste issues, appropriate assessment'.*

Following a *Request for Further Information* relating primarily to flood risk items and the requirement for a Construction, Demolition and Management Plan, the Planning Authority ultimately refused permission for 5 No. reasons relating to flooding. In summary, SDCC concluded that the development as proposed:

- Would not comply with the requirements of the sequential approach as set out in section 3.2 of the Planning System and Flood Risk Management Guidelines;
- Failed the Justification Test for Development Plans;
- Contravened the requirements of the Flood Risk Management Guidelines;
- Would not comply with the Justification Test;
- Lands are not proximate to any identified urban centres designated for growth;
- Strategic Flood Risk Assessment undertaken on behalf of the Planning Authority has identified the risk of flooding to the lands;
- The Planning Authority were not satisfied that the development of the lands for non-essential warehousing and logistics use would represent an appropriate use of undeveloped lands on a floodplain. It is noted that the application was assessed having regard to the *South Dublin County Development Plan 2010 - 2016* where it was Zoned EP2; and



- The Planning Authority was of the opinion that the car parking serving units B and C would represent a hazard to human health.

A First Party Appeal was submitted to An Bord Pleanála. In assessing the application, the An Bord Pleanála Inspector recognised that the appeal site **'immediately abuts the Baldonnell Business Park and as such the lands do form a natural extension of the park. The principle of the proposal for three warehouses for light industrial and logistics/warehouse use is therefore considered acceptable'**. [Our emphasis].

The Inspector further stated that:

*'The details on file clearly indicate that subject to the carrying out of proposed mitigation measures such as maintenance of the Camac River channel and the provision of the detention basin, that there would be no flooding to either the proposed buildings or residual flooding elsewhere as a result of displaced waters. I therefore, conclude that the applicant has adequately addressed the acceptability of the proposed development in this regard'*.

In conclusion, the Inspector set out that:

*'The recently adopted county development plan establishes the principle of development by virtue of the land-use zoning on the appeal site. The Regional Planning Guidelines advocate the promotion of the Dublin region as the economic hub for the country. The appeal site is considered to be strategically located off the N7 with easy access to the M50. The characteristics of the proposed development, namely size of units, limit the potential locations in which they can be located whilst ensuring ease of access to strategic transport routes. The applicant has submitted a comprehensive site specific flood risk assessment which is considered to address the concerns cited by the Planning Authority in its reasons for refusal. The proposal is not considered to give rise to a traffic hazard or be prejudicial to public health. The proposal would not have an undue negative impact on aviation or flooding subject to mitigation measures outlined in the application.'*

The Inspector recommended that permission be granted, and the Board accepted the Inspector's recommendation and granted permission on 13<sup>th</sup> April 2017.

It is noted that a number of amendment applications to the 'Parent Permission' were lodged as summarised below:

SD17A/0362	1) Increase in height of Units A, B & C by 1.95 m to a maximum height of 16.3 m; (2) Minor elevational amendments and associated consequential works.	Grant
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In determining this application, the Planning Authority concluded that:

*'Having regard to the 'EE' zoning objective of the site and existing and proposed development in the vicinity, and permitted development on the site, it is considered that subject to compliance with the conditions set out below, the proposed increase in height of the*



*building would not detract from the character of the surrounding area, would be in accordance with the current South Dublin County Council Development Plan and would be acceptable in terms of aviation safety. A condition should be attached requiring all conditions of An Bord Pleanála relating to the parent permission PLo6S.246392 to be adhered to. The condition relating to cranes reflecting the concerns of the Department of Defence should be reiterated, having regard to the proximity to the adjoining runway in Baldonnell aerodrome and the increase in height that would result from this grant of permission. As such, the proposed development would be in accordance with the proper planning and sustainable development of the area. It is therefore, recommended that permission be granted subject to conditions set out below.* [Our Emphasis].

SD18A/0266	<p>(1) Omission of Unit C and provision of enlarged Unit B (increasing from 10,967 sq m GFA to 18,617 sq m GFA) with a height of c. 17.65 m including mezzanine level. The previously permitted Units A, B and C resulted in a total of 32,771 sq m. The proposed units A and B result in a total of 29,454 sq m. which results in an overall reduction of 3,317 sq m. GFA.</p> <p>(2) The proposed Unit B incorporates 690 sq m GFA of ancillary office space (a reduction of 386 sq m compared to the combined permitted ancillary office space within permitted Unit B and C). (3) Omission of one vehicular entrance and associated bridge between permitted Unit B and C and replacement with two vehicular entrances and associated bridges to either side of proposed Unit B.</p> <p>(4) Relocation substation.</p> <p>(5) Reduction in car parking spaces from 329 to 235; 54 bicycle parking spaces are proposed to service Unit B.</p> <p>(6) Resultant amendments to site layout, yards, elevations, signage, internal road layout, landscaping, ground works, drainage, gates, fencing, services and utilities and all associated and ancillary site development works.</p>	Grant (17.09.2018)
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The Planning Officer in the assessment of the amendment application concluded that:

*'Having regard to the 'EE' zoning objective of the site, nature and location of the development proposed and the existing development in the vicinity, it is considered that subject to the conditions set out below, the development would not seriously injure the amenities of the area or property in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area.'*

It is noted that a subsequent signage application was granted by SDCC as summarised below.

SD19A/0179	Erection of two backlight signage units at high level complete with raised lettering (Home Store + More) and associated concealed bracketry measuring 37.4 sq m each (total 74.8 sq m) to the southeast and northeast elevations facing Clonlara Road, mounted to previously approved development SD18A/0266.	Grant (06.07.2019)
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Phase 2 of the Development was granted permission by South Dublin County Council under SDCC Reg.Ref.: SD20A/0215

Reg. Ref	Sd20A/0215
Applicant	MLEU Dublin 2 Limited
Address	Moneenalion Commons Upper, Brownsbarn and Collegeland, Baldonnell Business Park, Dublin 22
Description of Development	The construction a logistics/warehouse unit (Unit E) southwest of Mountpark Baldonnell Phase 1 and west of the older original Business Park, Unit E will comprise of a GIA 60,747sq.m (including 2,020sq.m of ancillary office space and 4,802sq.m of other ancillary areas); Provide for 340 car parking spaces, 22 motorcycle parking spaces and 160 bicycle spaces to serves the proposed development; Flood mitigation works to store and attenuate flood flows from the River Camac; Formations of plateaux on the site with surplus excavated material to allow for future development of Unit F; Access to the site will be from the existing Phase 1 development (referenced above) located on Clonlara Road; amendments to the yard and entrance arrangement for permitted Unit D are proposed (SD19A/0048); All ancillary landscaping, internal roads, associated infrastructure and buildings and site development works to support the development which is primarily greenfield and located between Casement Aerodrome and the N7 national route. The proposal will form part of the second phase of development to that permitted under SD19A/0370 and Phase 1 under SD15A/0309 (ABP Ref. PLo6S.246392), as amended by permissions SD17A/0362, SD18A/0266 and SD19A/0048. An Environmental Impact Assessment Report (EIAR) will be submitted to the Planning Authority with the planning application.
SDCC Decision	Grant Permission
SDCC Decision Date	15 <sup>th</sup> October 2020

The Planning Officer in determining the application was of the opinion that:

*'Having regard to the provisions of the South Dublin County Council Development Plan, the 'EE' land use zoning, the established character of the area and the nature and scale of the proposed development, it is considered that, subject to the conditions set out below, the proposed development would be in accordance with the national and regional policy and the SDCC Development Plan and would, therefore, be in accordance with the proper planning and sustainable development of the area.'*

The development was granted permission by South Dublin County Council subject to 27 No. conditions.





SD20A/0319	Amend permitted logistics/warehouse units C and D and incorporate other amendments, providing for a resultant; Unit C, 7,937sq.m including 757sq.m ancillary office space (permitted 11,492sq.m total); Unit D, 12,050sq.m including 911sq.m ancillary office space (permitted 7, 856sqm total); Overall increase of 639sq.m for Units C and D; provision of maintenance ramp to swale; resultant amendments to site layout, minor revisions to flood mitigation strategy, yards, elevations, signage, internal road layout, landscaping, ground works, drainage, gates, fencing, services and utilities and all associated and ancillary site development works at a site at the townlands of Moneenalion Commons Upper, Brownsbarn and Collegeland, Baldonnell Business Park and is located between the Casement Aerodrome and the N7 national route and comprising of amendments to the second phase of development permitted under Ref. SD19A/0370 & SD20A/0215.	<b>Request Additional Information</b>
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South Dublin County Council requested Further Information pertaining to 6 No. items including signage, tree planting pits, ramp to swale, future cycle parking, information on the Kingswood Interchange and landscaping around carparking area.

A decision from South Dublin County Council is due on 15<sup>th</sup> March 2021.

**4.2.2 National Vehicle Distribution located to the west of the Subject Site (Identified as Site No. 2 on the Aerial Photograph at Figure 2.1)**

Reg. Ref	SD17A/0144
Applicant	National Vehicle Distribution Ltd
Address	Brownsbarn, Baldonnell, Co. Dublin
Description of Development	Permission for Retention is sought for a 3.04 hectare area of gravel surfacing, the installation of a surface water drainage network and underground Stormtech attenuation system, security lighting to the perimeter of the site (21 no. 10m high lighting columns with LED luminaires) and replacement of the existing boundary fence with security fencing. Planning Permission is sought for alterations to the installed gravel surfacing to include new tarmacadam surfacing over an area of 1.09 hectares. The works will also include landscaping alongside the Corbally Stream, alterations to the surface water drainage network and relocation of security fencing and security lighting columns along the eastern boundary of the site. The proposed works are in order to facilitate the outdoor, uncovered storage of up to 1,011 vehicles together with circulation areas and access roads.
SDCC Decision	Grant Permission & Grant Retention
SDCC Decision Date	6 <sup>th</sup> July 2017



Reg. Ref	SD17A/0220 ABP Ref.: PLo6S.301182
Applicant	National Vehicle Distribution Limited
Description of Development	1.512 ha area of gravel surfacing to provide outdoor, uncovered vehicle storage for up to 1,878 vehicles. The works will also include access roads, staff/visitor parking, footpaths, an automatic carwash, 3 handheld jetwash units and extension to the existing foul and surface water drainage network and water supply services. Works will include an extension to an existing building to provide a client reception area (total gross floor area c.164 sq m) together with the replacement of 1 existing sign and the erection of 3 further new signs on an existing building (3 signs to have overall dimensions of 4.5 m wide x 3 m high, 1 sign to have overall dimensions 3.0 m wide x 2.0 m high).
SDCC Decision	Grant Permission
SDCC Decision Date	15 <sup>th</sup> February 2018
First Party Appeal Decision	Grant subject to conditions and financial contribution
ABP Decision	10 <sup>th</sup> September 2018

In determining the application the South Dublin County Council Planning Officer noted:

*'the main issues for assessment relate to Zoning and Council policy, visual amenity, landscaping and green infrastructure, vehicular access and car parking, services, drainage and public health.'*

The Planning Officer issued a *Request for Further Information* relating to a number of items as summarised below:

- Tree and hedgerow survey;
- Ecology Report;
- Arboricultural Implications Assessment drawing;
- Tree Protection Plan;
- Fully detailed Landscape Plan including Planting Plan and Details Sheets; and
- Additional details on Water Services.

Planning permission was subsequently granted by SDCC on 15<sup>th</sup> February 2018 subject to 17 No. conditions. A First Party Appeal was lodged by the Applicant relating to Conditions and the Board granted permission with amended Conditions on 10<sup>th</sup> September 2018.

**4.2.3 Site to the West of Baldonnell Business Park (Identified as Site No. 3 on the Aerial Photograph at Figure 2.1)**

Reg. Ref	SD17A/0188
Applicant	McGuire Haulage Limited



Address	Clonlara Avenue, Baldonnell Business Park, Baldonnell, Dublin 22
Description of Development	Retention permission for site clearing and placing of unmetalled surfacing of the site over 9,700 sq m to facilitate HGV parking over 3,128 sq m and retention of temporary site entrance/exit as an interim access/egress subject to permanent replacement gates as described below: Permission for: (1) Additional HGV parking on 1,360 sq m of unmetalled surfacing; (2) temporary office/staff facilities building (56.3 sq m, 3.60 m high) for period of 5 years with associated car parking ancillary to the HGV parking activity; (3) 2 entrance/exit gates including boundary fencing to the sites north east boundary fronting the estate access road (Clonlara Avenue); (4) perimeter landscaping throughout; (5) aggregate storage bays 400 sq m, 3.00 m high to rear of site for temporary storage of 'in transit' aggregates periodically; (6) HGV wash bay plus site drainage including surface water runoff infiltration trenches to unmetalled yard and attenuation facility; (7) all associated site development works and utilities.
SDCC Decision	Grant Permission and Grant Retention
Decision Date	25 <sup>th</sup> January 2018

In the assessment of the application the Planning Officer noted that:

*'the use for the parking of HGVs is considered to be acceptable in principle, subject to the relevant policies and objectives of the South Dublin County Council Development Plan 2016-2022 and the protection of neighbouring amenities'.*

**4.2.4 Site to the North-West of the Subject Site (Identified as Site No. 4 on the Aerial Photograph at Figure 2.1)**

Reg. Ref	SD17A0039
Applicant	Armalou Limited
Description of Development	A new vehicular entrance and boundary fence to new display surface car parking, on 0.15 ha of vacant land, located west of the existing car parking including a 6 m high internally illuminated signage totem and tensile fabric canopy structures. Extension of existing workshop by 208 sq m located to the north of Block B and extension of 106 sq m for new vehicle preparation to the north of Block B and internal alterations including a trade parts counter and a new double door on the west elevation of the showroom building, known as Block B, a two storey extension matching the existing height of Block C of 692 sq m to the north of the servicing area of the building known as Block C for vehicle servicing and



	waiting facilities and an external canopy structure of 200 sq m to the east elevation of the existing parts building known as Block A on an overall site of 2.257 ha.
SDCC Decision	Grant
Decision Date	11 <sup>th</sup> April 2017

In recommending a grant of permission for the above application, the Planning Officer noted that:

*'Having regard to the 'EE' zoning objective of the site and existing and proposed development in the vicinity, it is considered that subject to compliance with the conditions set out below, the proposed development would not significantly detract from the character of the surrounding area, would be in accordance with the current South Dublin County Council Development Plan and would be acceptable in terms of traffic safety.'*

The application was granted permission on 11<sup>th</sup> April 2017.

#### 4.2.5 Site to the North West (Identified as Site No. 5 on the Aerial Photograph at Figure 2.1)

Reg. Ref	SD20A/0204
Applicant	Airtraks Ltd T/A ATC Computer Transport
Description of Development	Provision of a warehouse unit with ancillary office and staff facilities and associated development. The building will have a maximum height of 15.8m with a gross floor area of 2,222sq.m including a warehouse area (1,530sq.m), staff facilities (302sq.m) and ancillary office area (390sq.m) and will also include the provision of 1 new vehicular access/egress point along the north-west boundary of the subject site onto Clonlara Road; pedestrian access; 22 ancillary car parking spaces; bicycle parking; HGV marshalling yard with 2 loading bays; level access goods doors; dock levellers; access gate; signage; hard and soft landscaping; lighting; boundary treatments and associated site development works above and below ground.
SDCC Decision	Grant Permission
Decision Date	5 <sup>th</sup> October 2020

In determining the application, the Planning Officer concluded that:

*'Having regard to the provisions of the South Dublin County Council Development Plan, the established character of the area and the nature, the scale of the proposed development, it is considered that, subject to the 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.'*





Permission was granted on 5<sup>th</sup> October 2020 for the development.

#### 4.2.6 Site to the East (Identified as Site No. 6 on the Aerial Photograph at Figure 2.1)

Reg Ref	SD03A/0010 AFB Re <sup>4</sup> PL 065 236426
Address	Site north of N7 Neas Road & Citywest Bridge at Citywest Interchange, Brownsbarn, Neas Road, Dublin 24.
Applicant	McDonald's Restaurants of Ireland Ltd.
Description of Development	Single storey "McDonalds" fast food restaurant (300sq m.) with drive-through facility and including all associated site development and infrastructural works, road realignment works, landscaping service plant and surface car parking on a site of 0.49 ha. The application also includes for 1 no. Totem sign (internally illuminated), 8 no. internally illuminated signs and 2 no. speaker boxes.
SDCC Decision	Refuse Permission
Decision Date	3 <sup>rd</sup> March 2010
ABP Decision	Refuse Permission
Decision Date	4 <sup>th</sup> August 2010

The Planning Officer's Report noted that:

*'A submission from the National Roads Authority states that the provision of drive-through restaurant facilities adjacent to national roads is incompatible with the Authority's policy objectives relating to road safety. As the proposed site is located adjacent to the N7 National Primary Road, the National Roads Authority report states that the Development proposed can therefore be considered to provide a limited service area type function by providing restaurant facilities for the travelling public using national road.'*

Furthermore, the Planning Officer outlines that the:

*'Roads Department report states that intensification of use of the on ramp from the Citywest Interchange to the N7 Northbound is not recommended; the access ramp has capacity limitations due to its geometrical design. The realignment of the N7 northbound slip road at Brownsbarn is an objective in the Draft South Dublin County Development Plan 2010 -2016 Table 2.2.6. The linking of Citywest interchange to Barney's Lane is a specific objective in the current South Dublin County Council Development Plan 2004-2010 and the Draft County Development Plan 2010 -2016. The development of sites in this area in a piecemeal manner would not contribute towards the protection of road capacity. Accordingly, Roads Department cannot support individual applications that do not address the roads network in a comprehensive manner.'*

The scheme was refused by South Dublin County Council for 4 No. reasons as set out below:

1. *The existing on ramp for the Citywest Interchange to the N7 northbound has capacity limitations due to its geometrical design; the intensification of use of the access ramp by reason of additional traffic movements generated by proposed fast food restaurant*



*with drive-through facility would result in traffic congestion at this location. The proposed development of drive through restaurant facilities which are intensive trip generators would constitute an inappropriate and unsustainable form of development at this location and would contribute to a diminution of the traffic carrying capacity of this interchange on a national route. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.*

2. *The proposed restaurant with drive-through facilities would be contrary to the National Roads Authority advice note NRA TA70/08 (published in the NRA Design Manual for Roads and Bridges) Paragraph 4.34 relating to service area. One of the primary purposes of the services area is to provide opportunity for drivers to rest, thereby avoiding fatigue and potential collisions. The Nature of a drive-through facility runs contrary to this purpose. The proposed development by the precedent for which it would set, would adversely affect the use of the N7 National Road.*
3. *The development of individual sites within the zoned 'E Zoning' lands without an overall long term master plan road layout incorporating Barney's Lane to Citywest interchange link road would not facilitate the overall development of the lands in a co-ordinated manner and would not contribute towards the protection of road capacity in the area.*
4. *The siting of the proposed fastfood restaurant with drive-through facility and the associated signage would adversely affect the setting of Protected Structure 261 Royal Garter Stables. The proposed development in its proposed location would have a detrimental effect of the setting of the Protected Structure and therefore would materially affect the character of the Protected Structure and its curtilage.*

A subsequent First Party Appeal was lodged with An Bord Pleanála.

In the assessment of the scheme, the Inspector noted that the NRA had advised that the proposed development is not suitably designed as a service area. It was also considered that the proposed development would be a *'significant trip generator, would be to misuse the national road and would be contrary to the objectives set out in the National Roads Authority's Policy Statement on Development Management and Access to National Roads.'*

Having regard to the fourth reason for refusal, South Dublin County Council considered the proposed development to have a detrimental effect on the setting and character of the protected structure and its curtilage. The Inspector was of the opinion that:

*'the visual impact of the proposed development greatly exceeds that which would be associated with the proposed building. Advertising panels are proposed on top of the building, of similar proportions to the building itself. Internally illuminated signs and logos are to be erected on these vividly coloured panels. In addition, a 12m high totem pole advertising structure is proposed, which would be similar in height to the protected structure.'*

The scheme was ultimately refused by the Board for the following 2 No. reasons:

- 1.) *Having regard to the zoning objective on the site as set out in the current development plan for the area which is to provide for industrial and related uses and to its location adjacent to the*



*Citywest grade-separated junction on the National Primary Road N7, it is considered that the proposed development, by reason of the generation of non-industrial related traffic movements would contribute to the diminution of the traffic carrying capacity of a national route, would lead to the premature and unacceptable reduction in the level of service available to road users and reduce the benefit from the substantial investment made in the national road network. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

- 2.) *Having regard to the nature and scale of the development and associated advertising signs, it is considered that the proposed development would adversely affect the setting of the protected structure the Royal Garter Stables and would, therefore, be contrary to the proper planning and sustainable development of the area.*

**4.2.7 Site to the East fronting onto the N7 (Identified as Site No. 7 on the Aerial Photograph at Figure 2.1)**

There are 2 No. recent applications pertaining to the Protected Structure (RPS Ref. 261) located to the east of the subject lands as summarised below:

Reg. Ref	SD17A/0131
Address	Brownsbarn, Citywest Campus, Dublin 24.
Applicant	Specialized Bicycle Components Ire. Ltd.
Description of Development	Change of use from restaurant and public house to use as a specialty bicycle retail store with associated ancillary uses to include repair/servicing workshops, custom fitting facilities and staff and customer facilities, comprising ground floor area of 699.6 sq m and a first floor area of 568.9sq m. It is to be noted that the current structure on site, which comprises Brownsbarn Bar and Restaurant, is identified as Protected Structure, RPS Ref. 261.
SDCC Decision	Grant Permission
Decision Date	19 <sup>th</sup> June 2017

The Planning Officer in their assessment of the scheme

Reg. Ref	SD17A/0324
Address	Brownsbarn, Citywest Campus, Dublin 24.
Applicant	Specialized Bicycle Components Ire. Ltd.
Description of Development	The refurbishment of 279.4 sq m of existing derelict outbuildings at ground and first floor level for use of the refurbished areas of the outbuildings as a specialty bicycle retail store subsequent to the change of use, Planning Reference SD17A/0131, including the removal of existing asbestos roof, replacement roof structure and finishes and modifications to the existing façade including the insertion of new windows/doors. (b) Permission for use of the refurbished areas of the outbuildings as a specialty bicycle



	<p>retail store subsequent to the change of use, Planning Reference SD17A/0131. (c) Removal of 2 existing external steel stairwells. (d) Provision of new steel external stairwell. (e) New glazed entrance lobby of 13.8sq.m. (f) Replacement curtain walling to the northeast courtyard façade. (g) Removal of existing internal stairwell and lift shaft. (h) Construction of new internal staircase. (i) Minor modifications to the interior of the existing protected structures. (j) Construction of new wc and changing facilities and new universal access wc. (k) Widening of existing external gated entrance and the insertion of a new sliding gate. (l) New courtyard surface finishes and landscaping and all ancillary site works. (m) New external signage on the northwest and southwest elevations. (n) Provision of new vehicular goods entrance to north west elevations. It is to be noted that the current structure on the site which comprises Brownsbarn and Restaurant are identified as Protected Structures, RPS Reference 261.</p>
SDCC Decision	Grant Permission
Decision Date	3 <sup>rd</sup> November 2017

#### 4.3 Planning History Analysis

The planning history of the surrounding area demonstrates that South Dublin County Council and An Bord Pleanála have positively considered the development of the Enterprise and Employment zoned lands surrounding the site subject to this report. An Bord Pleanála have duly considered the surrounding context of the subject lands including flooding, ecology and noted in their assessment of a warehouse development under ABP Ref.: PL.06S.246392 (SD15A/0309) that *'The recently adopted county development plan establishes the principle of development by virtue of the land-use zoning on the appeal site. The Regional Planning Guidelines advocate the promotion of the Dublin region as the economic hub for the country. The appeal site is considered to be strategically located off the N7 with easy access to the M50.'*

The proposed development seeks to construct 2 No. warehouses with ancillary office space and staff facilities with a maximum height of 16.35 m (unit 1) and 15.35 m (unit 2) respectfully. It is noted that warehouses in excess of 16.35 m have previously been permitted in the surrounding locale, for example under SD18A/0266 where heights of up to 17.65 m were permitted by South Dublin County Council.

It is our professional planning opinion that the development subject to this planning application is appropriately located and scaled having regard to the planning history of the surrounding area as outlined at Section 4.2 above.





**5.0 DETAILED DEVELOPMENT DESCRIPTION**

**5.1 Development Description Summary**

The proposed development seeks to provide 2 No. warehouses which includes:

<b>Unit 1</b>	
<b>Uses</b>	<b>Proposed</b>
Warehouse	7,397 sq m
Ancillary Offices	362 sq m
Staff Facilities	397 sq m
<b>Total:</b>	<b>8,156 sq m</b>

<b>Unit 2</b>	
<b>Uses</b>	<b>Proposed</b>
Warehouse	5,031 sq m
Ancillary Offices	536 sq m
Staff Facilities	423 sq m
<b>Total:</b>	<b>5,990 sq m</b>

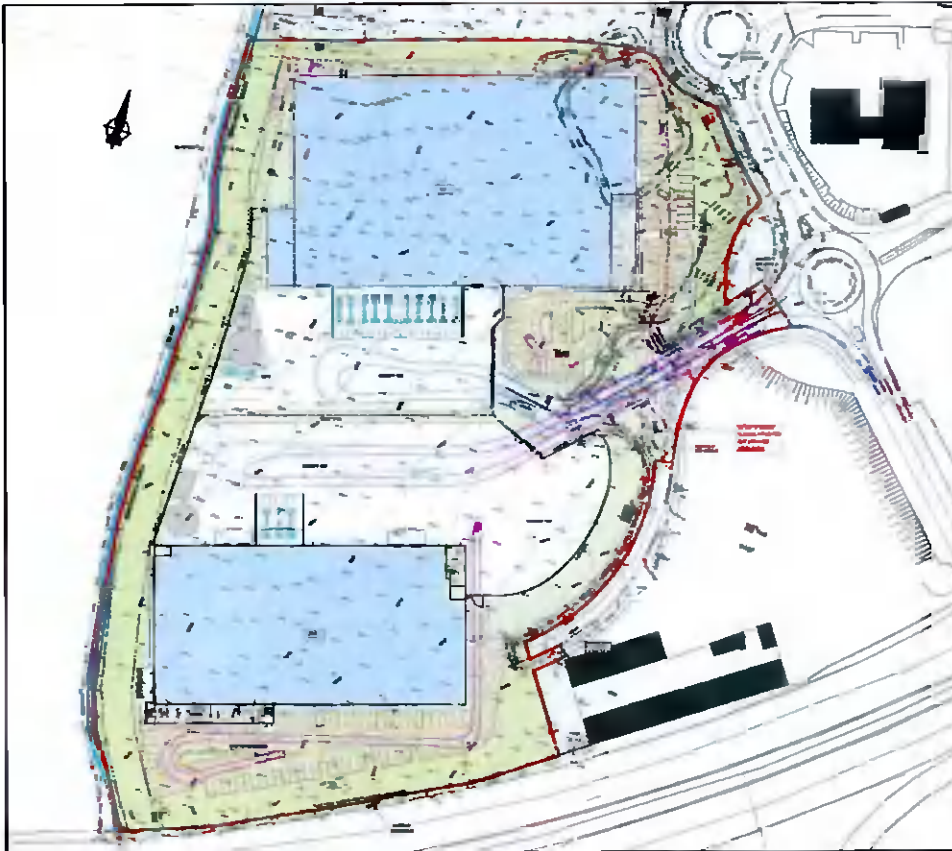
The total area of the 2 No. warehouses with ancillary offices and staff facilities is therefore proposed to be 13,886 sq m. The maximum height of Unit No. 1 is proposed to be 16.35 metres, and Unit No. 2 is proposed to be 15.35 metres in height. Both units will have an internal height of 12 metres.

**Ancillary Development**

The development will also include: vehicular access/egress routes to the subject site via the existing roundabout and access road; plus alteration to the existing access arrangements to the subject lands to facilitate safe traffic flow to/from the proposed facilities; pedestrian access; 109 No. car parking spaces; bicycle parking; HGV Parking; HGV yards; level access goods doors; dock levellers; access gates; signage; hard and soft landscaping; lighting; boundary treatments; ESB substation; sprinkler tanks; pump houses; and all associated site development works above and below ground.

An extract from the proposed site layout is provided below for reference:





**Figure 5.1: Proposed Site Plan**

**Source: Kavanagh Burke Consulting Engineers, 2021.**

**5.2 Key Site Statistics**

Total Area of Subject Land:	4.04 Ha
Total Gross Floor Area:	14,146 sq m (Unit 1 – 8,156 sq m & Unit 2 - 5,990 sq m)
Site Coverage:	35%
Plot Ratio:	0.32
Car Parking:	109 No. spaces



Visualisations of the proposed scheme are provided below:







**Figure 5.2 – 5.4: Visualisations of the Proposed Scheme.**

**Source: Digital Dimensions, 2021.**

### 5.3 Design Rationale

A Design Statement that has been prepared by Kavanagh Burke Consulting Engineers in conjunction with JBA Consulting is enclosed as a separate document. The Design Statement sets out the rationale for key development concepts detailed below:

*The rationale for the development is to provide two similar styled warehouse buildings on the highlighted appropriately zoned site north of the mature Citywest Business Park. These warehousing units will generally be in keeping with similar developments in the area by designing large enclosures with relatively small elements of attached ancillary offices. This proposal on completion will further improve the employment opportunities available in the general area and will bring associated advantages to the local economy and local community.*

*The position of the Naas Road, the former Coaching Inn, the Camac River to the western site boundary and the existing roundabout arrangements were identified early in the design stages as key development considerations.*

*Given these existing features, the proposed site layout including landscaping were carefully designed considering these existing elements.*

*The design goal to provide modern yet practical and appropriate building appearance at this prominent location was carried through the design development to the presented*





*proposal which forms this planning application. The building arrangement and design have therefore sought to provide a layout and elevational detail that creates a suitable identity for a development north of the existing Citywest Business Park and major employment node.*

An Architectural Heritage Impact Assessment was carried out by Historic Building Consultants which stipulates that:

*'From an architectural heritage perspective, the only significant factor is the presence of the Royal Garter Stables on an adjacent site. There are no other protected structures or structures that are included in the National Inventory of Architectural Heritage in the vicinity of the application site.'*

In assessing the potential impact on the setting of the Protected Structure the analysis examines the viewpoint of those using the Naas Road. When viewed from the northbound side of the Naas Road, the assessment outlines that:

*'The proposed warehouse unit 2 has been set back from the road so as to leave the view of the end of the stables building unobstructed. As noted above, there are trees and hedgerows along the road frontage to the west of the application site such that the stables building only comes into view once the application site is reached'*

The Assessment outlines that when viewed from the southbound side of the Naas Road that:

*'The warehouse may be slightly visible to the rear of the stables building but the prominence of the stables is such that any structure to the rear would not detract from the view.'*

Furthermore, in considering the view of the subject lands from the opposite side of the Naas Road, Historic Building Consultants outline that:

*'From viewpoints such as this the protected structure can only be seen from a limited area on a height above the Naas Road. The application site is set back at the rear of the protected structure and the prominence of the stables building dominates the scene. Buildings to the rear would be visible, but not to the extent of detracting significantly from the character of the protected structure.'*

Importantly, the Architectural Heritage Impact Assessment highlights that:

*'there is an extensive car park across the entire rear of the protected structure and the large scale of this car park is broken up by significant numbers of trees. The trees are still immature, but nonetheless give an element of screening, as is seen in plate 1 above. The separation in distance between the protected structure and the proposed unit 2 would be about 30 metres at the closest point, though the layout of the two buildings, set at an angle to each other, means that the distance is generally greater than this. The presence of the trees and the effect of the car park both combine to increase the separation. To the north of the protected structure the view of the Royal Garter Stables from the approach road*



would be unobstructed and there would be a significant distance between the stables and warehouse unit 1.'

The Design Team have been conscious of the positioning of the Protected Structure to the west of the subject land in designing the 2 No. warehouses subject to this application. The Architectural Heritage Impact Assessment concludes that:

*'The application site is zoned for industrial purposes and hence it is to be expected that it would be developed for such a use. The proposed buildings have been sited so as to minimise any potential impact on the character and setting of the Royal Garter Stables, which form a prominent landmark on the Naas Road.'* [Our Emphasis].

5.4 Landscaping

The subject lands have been subject to significant landscaping measures to ensure that the 2 No. proposed warehouses and their respective curtilages are appropriately screened from the public realm. An extract from the Landscape Masterplan is provided below:



Figure 5.5: Proposed Landscaping Masterplan.





Source: JBA Consulting, 2021.

JBA Consulting have provided the following Landscape Strategy for the proposed site:

*The design has been influenced by Irish Water and ESB wayleaves road sightlines, overhead electricity lines, drainage and lighting layouts.*

*The design comprises:*

- *The retention of existing mature hedgerow planting along the western boundary which will be managed, pruned and supplemented with tree planting to assimilate the development into the surrounding landscape;*
- *The plaza at unit 2 and open space at unit 1 A with verdant swathes of trees and shrub planting, with south facing seating and picnic areas;*
- *All car parking space will be grass - crete concrete paver system;*
- *Supplementary screen planting(Advanced Heavy Standard size) and hedgerow(including a mix of pollinator and native species)have been proposed along northern, southern, eastern and western boundaries to enclose the Site;*
- *Pollinator low/medium level ornamental shrubs planting have been designed to add visual amenity and break up the hard surface in car parking areas;*
- *Native tree planting in wildflower mix has been designed to enhance biodiversity.*

As illustrated in the Landscape Masterplan and Sections, a 10 m riparian buffer is being provided along the western side of the subject lands which comprises a mature woodland and well-established understorey.



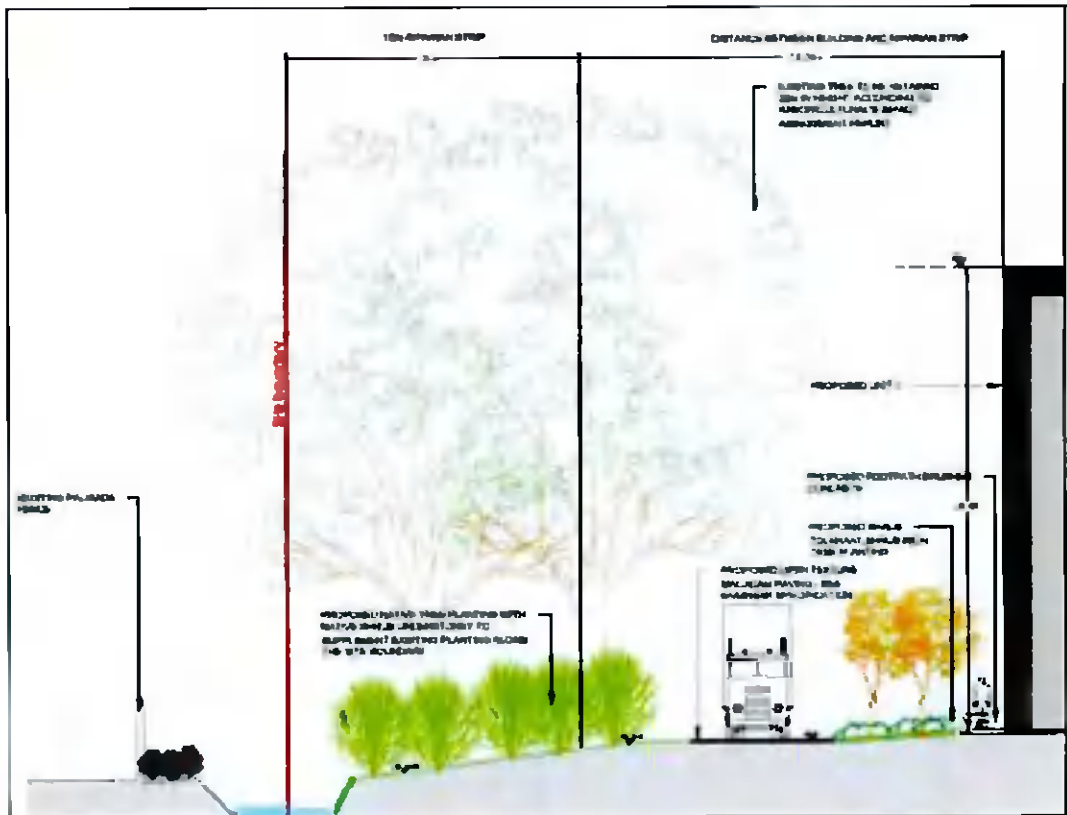


Figure 5.6: Landscaping Section illustrating the Riparian Buffer Zone.

Source: JBA Consulting, 2021.

An Ecological Impact Assessment has been prepared by JBA Consulting where it was concluded that:

*'Based upon the information supplied regarding the site layout, drainage, landscaping; and provided that the warehouse development is constructed in accordance with the mitigation measures outlined above, there will be no significant impact in-combination with other projects and plans, as result of the development and associated works on the ecology and local species of the area.'*

The Assessment also outlines that:

*'Furthermore, the substantial remedial/supplementary tree, shrub and wildflower planting/sowing within the proposed development, outlined by the landscape plan, has ensured that negligible - minor residual impacts (as a result of the construction phase) will be downgraded to neutral - negligible residual impact levels for five of the effected ecological features.'*





The proposed landscaping measures will ensure that the warehousing development will assimilate into the existing environment and ensure that the ecological integrity of the subject site and the character of the proximate Protected Structure are not unduly and negatively impacted.

## 5-5 Engineering Services

Kavanagh Burke Consulting Engineers have set out the proposed water services within the accompanying Drainage Design Report. A summary of the proposed services is provided below:

### Surface Water

*'In considering the above surface water management solution we considered all SuDS devices and given the industrial nature of the proposed operations on this site, the above solution of underground surface water attenuation was decided on.'*

*'The proposed surface water management solution for the subject site provides both runoff quality and quantity control. Quality control is provided by ensuring all surface water runoff is dealt with on site as described earlier in this document with reference to the specified attenuation system with in-built "isolator row", proprietary silt traps & petrol interceptors. Quantity control is also provided through the surface water attenuation system coupled with the downstream flow control device. This system of surface water management has been put in place throughout the more recent developments of Baldonnell Business Park and Kingswood Business Park individual sites have been developed in a similar nature.'*

### Foul Sewer

*'A new foul sewer has been designed to collect discharge from the proposed development and discharge to the existing foul sewer network at Brownsbarn Drive. This proposed network collects the sewage on site from the proposed 2 no units and ancillary offices/staff facilities. Connection to the existing foul sewer network is proposed at the existing foul sewer manholes located at the footpaths of the existing roundabout at Brownsbarn Drive.'*

*'The peak foul sewer discharge rate is based on the discharge unit method of drainage design for calculating maximum sewage and wastewater flows. The proposed ancillary offices and warehouse toilet facilities are the source of wastewater for overall development.'*

### Watermain

*'The watermain proposed to serve the development will form a metered connection from the existing 200mm watermain on site, at Brownsbarn Drive, the exact connection locations shown on accompanying drg ref. D1678 – D4.'*

We highlight that the aforementioned drainage strategy is the typical arrangement for Industrial developments in the surrounding locale.



## 5.6 Traffic and Transportation

The proposed scheme provides 109 No. car parking spaces to serve the 2 No. warehouses. It is noted that the Car parking requirements as set out in *the Dún Laoghaire – Rathdown County Development Plan 2016 – 2022* are discussed at Section 6.5 of this report.

Stephen Reid Consulting Engineer outlines that:

*'A revised access roadway is proposed with the removal of the small diameter roundabout to the southeast of Citywest Roundabout 2. The access road will have new priority junctions serving the car park accesses to each unit and the existing Brownsbarn building (occupied by Specialized cycle retail outlet) and separate priority junctions serving the HGV yard for each Unit. Extension to the existing footpaths will link the pedestrian access of each unit to the existing footpaths.'*

Furthermore, outlining that:

*'It can be seen from the commentary in this TIA that the volumes of traffic generated by the proposed development will not be significant during the network peak hours, and this can be accommodated by the proposed access arrangements and internal layout measures without excessive queuing or delays. Therefore, it is submitted that the development as proposed is in accordance with the proper planning and sustainable development of the area.'*

An independent Stage 1 Road Safety Audit was also carried out by Traffico. It is highlighted that the recommended measures have been implemented into the proposed site layout.



## 6.0 PLANNING CONTEXT

### 6.1 Relevant Development Management Standards

The purpose of this section is to detail the relevant current development policy and guidelines applicable in relation to the subject site at site at Brownsbarn, Citywest Campus, Dublin 24.

The *South Dublin County Council Development Plan 2016 – 2022* is the statutory plan for the area and guides development relating to the subject site.

### 6.2 Zoning – ‘Objective EE’

The subject site is zoned Objective ‘EE’ – Enterprise and Employment, where the objective is ‘to provide for enterprise and employment related uses’.



Figure 6.1: Zoning Map of the Subject Lands (Indicative Boundary Outlined in Red).

Source: *South Dublin County Council Development Plan 2016-2022 Maps, Map No. 4)*

Under the ‘EE’ zoning, warehousing is a permissible use and office-based industry and offices less than 100 sq m are also permissible under this zoning. Offices over 100 sq m are open for consideration.

The provision of 2 No. warehouses with ancillary office space and staff facilities at the subject site is effectively infilling a part developed industrial block of land which will introduce additional employment to the area complementing the existing employment uses in proximity to the site. Therefore, the proposed development is fully in accordance with the zoning objective. This greenfield site will be screened by the proposed landscaping.

#### 6.2.1 6 No. Year Road Proposal to the North of the Subject Lands

It is also noted that there is a 6 No. Year Road Proposal located to the north of the subject lands.



The *South Dublin County Development Plan 2016 – 2022* states the following in relation to the Six Year Road Programme designation:

*'Table 6.5 outlines a Six Year Road Programme, which is subject to available funding. Designs have been prepared in respect of some of these proposals. The Council may, at its discretion, introduce an additional road proposal, where such a proposal benefits economic and population growth.'*

The 'Six Year Road Proposal' dissects the National Vehicle Distribution Centre site located directly to the west of the site subject to this planning application. In the assessment of the most recent planning application at that site (SD17A/0220 ABP Ref.: PL065.301182), the Planning Officer acknowledged that:

*'the design of any future link road has not been determined and therefore this is not a guarantee that there will be in fact an underpass provided'.*

The proposed site plan layout does not impact the 'Six Year Road Proposal'.

### 6.3 Relevant Policies of the *South Dublin County Council Development Plan 2016 – 2022*

The following policies of the *South Dublin County Development Plan 2016 – 2022* are relevant to the proposed development:

Economic and Tourism (ET) Policy 1 (Overarching):

*'It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin County and in the Greater Dublin Area, whilst maintaining environmental quality'. [Our Emphasis]*

Economic and Tourism (ET) Policy 3 Enterprise and Employment (EE) of the *South Dublin County Council Development Plan 2016 – 2022* sets out that:

*'It is the policy of the Council to support and facilitate enterprise and employment uses (high-tech manufacturing, light industry, research and development, food science and associated uses) in business parks and industrial areas.' [Our Emphasis].*

The table below sets out further relevant policies of the Development Plan that are applicable to the subject development:

Policy	It is a policy of the Council:
ET3 Objective 2	<i>'To prioritise high tech manufacturing, research and development and associated uses in the established Business and Technology Cluster to the west of the County (Grange Castle and Citywest areas) to maximise the value of higher order infrastructure and services that are required to support large scale strategic investment.'</i>





ET3 Objective 3	<i>'To support the phased expansion of the established Business and Technology Cluster to accommodate strategic high-tech manufacturing investments, research and development and associated uses.'</i>
ET3 Objective 5	<i>'To ensure that all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme.'</i>
ET3 Objective 6	<i>'To ensure that business parks and industrial areas are designed to promote walking, cycling and public transport.'</i>
IE8 Objective 5	<i>'Within the Department of Defence Inner Zone (delineated on Development Plan Index Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20m in height above ground level should be permitted except where specifically agreed following consultation with the Department of Defence that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome.'</i>
IE8 Objective 5	<i>'Within the Department of Defence Inner Zone (delineated on Development Plan Index Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20 m in height above ground level should be permitted except where specifically agreed following consultation with the Department of Defence that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome.'</i>
TN3 Objective 1	<i>'To provide for a pedestrian bridge over the N7 at the Barney's Lane junction to improve access to the Saggart Luas terminus.'</i>

The proposed scheme is in accordance with the relevant policies of the Development Plan above. The proposal will facilitate the continued growth and success of industrial and logistics activity within in this area of Dublin, and the design proposed has been designed to a high-quality best practice standard in line with the treatment and context found on surrounding developments. Within this industrial context the subject development aims to be of a contemporary finish sustainable materials and treatments.

#### 6.4 Building Height Under the South Dublin Development Plan 2016-2022

Table 11.18 of the *South Dublin Development Plan 2016 – 2022* sets out Key Principles for Development within Enterprise and Employment zones as follows:

- *'Building heights respond to the surrounding context with transitions provided where necessary and reinforce the urban structure with taller buildings located along key movement corridors, gateways and nodes.'*
- *Individual buildings should be of contemporary architectural design and finish (including use of colour). Various treatments should be employed to reduce the bulk, massing and scale of larger buildings.'*



- *The layout and design of buildings maximise frontages onto the public realm and enclose private external spaces (such as service yards and car parks) and storage areas behind them.*
- *Signage should be simple in design and designed to integrate with architectural feature and/or the landscape setting (see also Section 11.2.8 Advertising, Corporate Identification and Public Information Signs).’ [Our Emphasis]*

The subject lands are located within the Department of Defence Security Zone. The Development Plan states the following in relations to the Inner Zone:

*‘Within the DoD Inner Zone, in view of the volume of helicopter operations and the level and variety of aircraft training movements and for safety and security reasons, planning applications for structures such as high mast lighting and antennae, in the Inner Zone will be subject to special examination by the DoD to ensure that their construction would not be undesirable for safety, security or operational reasons.’*

*In general, within the DoD Inner Zone (delineated on Development Plan Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20 metres in height above ground level should be permitted except where specifically agreed in writing following consultation with the DoD that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome’*

The maximum height of the proposed warehouses is 16.35 m thus the proposed development is in accordance with the maximum 20 m limit set for the Department of Defence Security Zone out in the Development Plan.

Furthermore, it should be noted that the wider surrounding area of the subject site is predominated by industrial developments. As described at Section 2.2 of this report, the subject lands are bound on 2 No. sides by road networks and on the other 2 No. sides by the National Vehicle Distribution Centre. The Design Team have also duly considered the proximity to the Royal Garter Stables, a Protected Structure in the design of the proposed development. As such the design of the warehouses are simple with contemporary finishes which can be easily assimilated into its surrounding context.

## 6.5 Car Parking

The maximum car parking standards are set out in Table 11.23 of the *South Dublin County Development Plan 2016 – 2022* and include the following standards for offices and warehouses:

Warehousing	1 per 100 sq m
Offices:	1 per 50 sq m



The total car parking spaces required and proposed for the proposed development are as follows:

	Development Plan Maximum Standard	Total Provided – Unit 1	Total Provided – Unit 2
Warehousing	1 per 100 sq m	7,397 / 100 = 73.97	5,031 / 100 = 50.31
Ancillary Offices	1 per 50 sq m	362 / 50 = 7.24	536 / 50 = 10.7
Maximum Standard as per Development Plan		82	61
Spaces Provided		59	50

As a result, the maximum number of car parking spaces permissible to serve the development (excluding the staff facilities) is 143 No. spaces. The development proposes a total of 109 No. car parking spaces which is in accordance with the principles of sustainable development.

## 6.6 Project Ireland 2040: National Planning Framework

Under the National Planning Framework (NPF), the Irish Government has set out long term strategic planning goals for the Republic of Ireland. These goals are geared towards compact growth and the sustainable development of Ireland to accommodate an increase in population of one million people by the year 2040. This is also tied to a target of increased employment across all regions, for the East and Midlands Region this equates to an additional 320,000 or a total workforce of 1.34 Million people.

The following National Policy Objectives set out how the NPF seeks to consolidate employment within sustainable and resilient locations that support the growth of urban settlements.

### NPO 1c

*'Eastern and Midland Region: around 320,000 additional people in employment, i.e 1.34 million in total.'*

### NPO 2a

*'A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.'*

### NPO 10b

*'Regional and Local Authorities to identify and quantify locations for strategic employment development where suitable, in urban and rural areas generally. [Our Emphasis]*

### NPO 11





*'In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.'*

Citywest Business Campus is an established employment centre in South Dublin and is well connected to the regional road network. There is also a significant ecosystem of light industrial, logistics, wholesalers, and businesses in the surrounding areas of Greenogue, Baldonnell and Kingswood Business Parks. As a strong employment centre with additional capacity the subject lands are capable of sustainably adhering to national objectives to limit urban sprawl and unsustainable development. Therefore, the proposed development is compliant with the National Planning Framework.

#### **6.7 Summary of Planning and Development Context**

The proposed development to provide 2 No. warehouses with ancillary offices and staff facilities is in accordance with the zoning objective pertaining to the site as the proposed development will introduce significant employment to the subject site. Therefore, it is considered that the subject development represents the proper planning and sustainable development of the area.







## 7.0 PLANNING ADMINISTRATION

### 7.1 Planning Fee

- A cheque made payable to South Dublin County Council in the amount of €38,000 representing the planning application fee payable in accordance with the provisions of Schedule 9 of the *Planning and Development Regulations 2021*.

Details of fee calculation:

Class	Calculation	Amount
Class 4	€38,000 maximum fee	€38,000 maximum fee

### 7.2 Statutory Notices

- An original page of the *Irish Daily Star* published on Wednesday, 16<sup>th</sup> June 2021 in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2021*.
- One copy of the Site Notice dated Wednesday, 16<sup>th</sup> June 2021, and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations, 2021*.

### 7.3 Planning Application Form

- A completed *South Dublin County Council Planning Application Form*, dated Monday, 21<sup>st</sup> June 2021.

### 7.4 Planning Report

- Six copies of this *Planning Report*, prepared by Thornton O'Connor Town Planning, dated Monday, 21<sup>st</sup> June 2021.

### 7.5 Appropriate Assessment by JBA Consulting

- An Appropriate Assessment Screening Report carried out by JBA Consulting dated June 2021.

### 7.6 Architectural Heritage Impact Assessment by Historic Building Consultants

- An Architectural Heritage Impact Assessment carried out by Historic Building Consultants dated June 2021.





**7.7 Flood Risk Assessment by JBA Consulting**

- A Flood Risk Assessment Report conducted by JBA Consulting, dated June 2021.

**7.8 Ecological Impact Assessment by JBA Consulting**

- An Ecological Impact Assessment prepared by JBA Consulting, dated June 2021.

**7.9 Report Prepared by Stephen Reid Consulting Traffic and Transportation**

- Report entitled '*Commercial Warehousing Development Traffic Impact Assessment, Units 601 and 605 Jordanstown Road, Greenogue, Co. Dublin*, dated June 2019.
- *A Stage 1 Road Safety Audit* prepared by Traffic Road Safety Engineering, dated March 2021.

**7.10 Part L Compliance Report by Axiseng Consulting Engineers**

The following Part L Compliance Reports have been prepared Axiseng Consulting Engineers.

- Part L Compliance Report for Unit 1 dated June 2021; and
- Part L Compliance Report for Unit 2 dated June 2021.

**7.11 Design Statement by Kavanagh Burke Consulting Engineers**

- A Design Statement prepared by Kavanagh Burke Consulting Engineers dated June 2021.

**7.12 Drainage Design Statement by Kavanagh Burke Consulting Engineers**

- A Drainage Design Report prepared by Kavanagh Burke Consulting Engineers dated June 2021.

**7.13 Arboricultural Impact Assessment Report by Arborcare**

- An *Arboricultural Impact Assessment Report* prepared by Arborcare.

**7.14 Drawings**

- Six copies of the following drawings enclosed with this Application:

Kavanagh Burke Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
D1	Site Location Map	1:2500	A3
D2	Existing Topographical Survey	1:500	A1
D3	Site Plan with Swept Paths	1:500; Nts	A1
D4	Drainage & Watermain Layout	1:500	A1





D5	Drainage Details Attenuations System Cross Section, Typical Trench, Road Gully & Headwall	NTS	A1
D6	Foul Sewer Manholes, Inspection Chamber, Bacfill and Trench Details	NTS	A0
D7 -1	SW Manholes, Gullies, Hydrobrake MH, Headwall, and Backdrop Details 1 of 3	NTS	A0
D7 -2	SW Manholes, Gullies, Hydrobrake MH, Headwall, and Backdrop Details 2 of 3	NTS	A0
D7 -3	SW Manholes, Gullies, Hydrobrake MH, Headwall, and Backdrop Details 3 of 3	NTS	A0
D8	Watermain Details	NTS	A1
SP - 00	Site Plan Extract: Unit 1 & 2 Sprinkler Tanks & Pump House	1:250	A2
SP - 01	Unit 1 Sprinkler Tank & Pump House - Plan, Section and Elevations	1:100	A1
SP - 02	Unit 2 Sprinkler Tank & Pump House - Plan, Section and Elevations	1:100	A1
ESB - 00	Unit 1 & Unit 2 Ste Plan Extract ESB Substations	1:250	A2
ESB - 01	Unit 1 ESB Substation Plan, Section & Elevations	1:100	A4
ESB - 02	Unit 2 ESB Substation Plan, Section & Elevations	1:100	A4
GA-A-1-01	Unit 1 Floor Plan - Ground Floor	1:200	A1
GA-A-1-02	Unit 1 Floor Plan - First Floor	1:200	A1
GA-A-1-03	Unit 1 Floor Plan - Second Floor	1:200	A1
GA-A-1-04	Unit 1 - Ancillary Offices & Warehouse Toilet Block - Floor Plans/Layouts	1:100	A1
GA-A-1-05	Unit 1 Architectural Elevations	1:200	A1
GA-A-1-06	Unit 1 Architectural Section 1-1	1:100	A1
GA-A-2-01	Unit 2 Floor Plan - Ground Floor	1:200	A1
GA-A-2-02	Unit 2 Floor Plan- First Floor	1:200	A1
GA-A-2-03	Unit 2 Floor Plan - Second Floor	1:200	A1
GA-A-2-04	Unit 2 Ancillary Office & Warehouse Toilet Block - Floor Plans/Layouts	1:100	A1
GA-A-2-05	Unit 2 Architectural Elevations	1:200	A1
GA-A-2-06	Unit 2 Architectural Section 2-2	1:100	A1
GA-07	Contiguous Elevations	1:200	A1

JBA Consulting			
Drawing No.	Drawing Title	Scale	Size
ENO-JBAI-XX-XX-DL-L-0002-S3-P01	Landscape Masterplan	As Shown	A1
ENO-JBAI-XX-XX-DL-L-0003-S3-P01	Landscape Section	As Shown	A1
ENO-JBAI-XX-XX-DL-L-0004-S3-P01	Landscape Section	As Shown	A1





ENO-JBAI-XX-XX-DL-L-0005-S3-P01      Planting Plan      As Shown      A1

Axiseng Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
EBB-AXE-ZZ-00-DR-E-60101	Site Lighting Services	As shown	A0







## 8.0 CONCLUSION

The proposed development represents a significant investment providing 2 No. warehouses and ancillary offices and service yards. The subject lands are located on appropriately zoned lands and is in accordance with the stated zoning objectives of the *South Dublin Development Plan 2016-2022* which is 'to provide for enterprise and employment related uses'. Therefore, the proposed development will ensure the proper planning and sustainable development of the area.

We trust you will find this application in order.

Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Signed:

A handwritten signature in black ink that reads "Sadhbh O'Connor".

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**Sadhbh O'Connor**  
**Director**  
**Thornton O'Connor Town Planning**



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