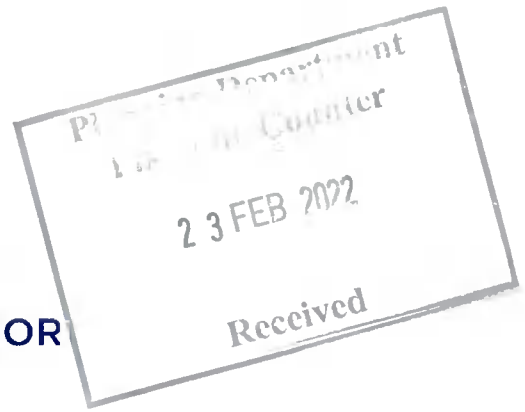




THORNTON O'CONNOR
TOWN PLANNING



PLANNING REPORT

Planning Report


In respect of the development of a warehouse unit with ancillary office and staff facilities and associated development

At a 3.03 Ha site at Magna Avenue and Magna Drive, Citywest, Dublin 24.

Submitted on Behalf of Rockface Development Limited

February 2022

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THORNTON O'CONNOR
TOWN PLANNING

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

Wednesday, 23rd February 2022

Dear Sir/ Madam

Re: APPLICATION FOR PERMISSION FOR THE PROVISION OF A WAREHOUSE DEVELOPMENT AT A 3.03 HA SITE AT MAGNA BUSINESS PARK, MAGNA DRIVE, DUBLIN 24

1.0 INTRODUCTION

1.1 Application for Development

Rockface Developments Limited¹ has retained Thornton O'Connor Town Planning in association with Kavanagh Burke Consulting Engineers², Enviroguide Consulting³, 3D Design Bureau⁴, Stephen Reid Traffic and Transportation Consulting⁵, BPC Engineers⁶, Decibel Noise Control⁷ and Axiseng⁸ to prepare this application for permission for development to provide a warehouse at a 3.03 Ha site at Magna Avenue and Magna Drive, Citywest, Dublin 24.

The lands are bounded to the south by Magna Avenue, to the north and west by Magna Drive and to the east by Magna Business Park.

1.2 Summary of the Proposed Development

Rockface Developments Limited intend to apply for permission for development at a 3.03 Ha site at Magna Avenue and Magna Drive, Citywest, Dublin 24. The lands are bounded to the south by Magna Avenue, to the north and west by Magna Drive and to the east by development within Magna Business Park.

¹ Unit 5, The Plaza, Greenogue Business Park, Rathcoole, Co. Dublin

² Unit G3, Calmount Park, Ballymount, Dublin 12

³ 3D Core C, Block 71, The Plaza Park West, Dublin, D12 F9TN

⁴ 65 Rock Rd, Blackrock, Dublin, A94 PT62

⁵ Estuary House, New Street, Malahide, Co. Dublin.

⁶ 19-22 Baggot Street Lower, Dublin 2, Ireland, D02 X658

⁷ 39 Mount Eagle Grove, Leopardstown Heights, Leopardstown, Dublin 18

⁸ No. 47 Mount Street Upper, Dublin 2

The development will comprise the provision of a warehouse unit with ancillary office and staff facilities and associated development. The building will have a maximum height of 15.5 m with a gross floor area of 13,604 sq m including a warehouse area (12,568 sq m), staff facilities (498 sq m) and ancillary office area (538 sq m).

The development will also include: a vehicular and pedestrian entrance to the site from Magna Avenue, a separate HGV entrance from Magna Drive; 69 No. ancillary car parking spaces; covered bicycle parking; HGV parking and yards; level access goods doors; dock levellers; access gates; signage; hard and soft landscaping; lighting; boundary treatments; ESB substation; sprinkler tank and pump house; 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:

Introduction	Section 1.0
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
Conclusion	Section 8.0

1.4 Appropriate Assessment

This application was screened for Appropriate Assessment by Enviroguide Consulting. Please see the full Assessment separately enclosed. Having regard to the location of the subject site at a distance from any Natura 2000 sites, the nature and extent of the development (1 No. warehouse, ancillary offices, staff facilities, HGV loading areas, and ancillary car parking) the screening report concludes that:

'The Proposed Development at Magna Avenue, Magna Business Park, Dublin 24 has been assessed taking into account:

- *the nature, size and location of the proposed works and possible impacts arising from the construction works.*
- *the qualifying interests and conservation objectives of the European Sites*
- *the potential for in-combination effects arising from other plans and projects.*

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that, on the



basis of objective information; the possibility may be excluded that the Proposed Development will have a significant effect on any of the European Sites listed below:

*Glenasmole Valley SAC (001209)
Wicklow Mountains SAC (002122)
Rye Water Valley/Cartron SAC (001398)
Red Bog, Kildare SAC (000397)
South Dublin Bay SAC (000210)
North Dublin Bay SAC (000206)
Wicklow Mountains SPA (004040)
Poulaphouca Reservoir SPA (004063)
South Dublin Bay and River Tolka Estuary SPA (004024)
North Bull Island SPA (004006)*

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.'

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 3.03 Ha (c. 30,300 sq m) is located to the north of Magna Avenue, to the south and east of Magna Drive and to the west of Magna Business Park. The Magna Drive and Magna Avenue roundabout is located at the southwest corner of the site. Magna Business Park warehouse units No. 25 (Leo Laboratories Citywest) and No. 35 (Milish Foods Limited) border the east of the site. An aerial map of the site location is provided in Figure 2.1 below:



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

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

2.2 Site Context

The surrounding area is characterised by a variety of uses. The subject lands are located within Manga Business Park which is in a location with an agglomeration of business parks/industrial buildings. The business park environment is also bounded by residential development

With regard to the industrial context, Citywest Business Campus is located c 1.2km to the north and Baldonnell Business Park c. 2.3 km to the northwest. Greenogue Business Park is located further northwest (c. 4km from subject site) whilst Kingswood Business Park is located c.3km north of the subject site.

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, annotated by Thornton O'Connor Town Planning, 2022)

The residential context includes the Belfry Residential Estate located to the south of the site, across Magna Avenue, and comprises predominantly 2 No. storey and 3 No. storey dwellings. Other residential dwellings in the locale include the Belfry Hall apartment complex which is located to the south-west of the subject site and reaches 4 No. storeys in height. To the west of the site, across Magna Drive, some 463 No. residential units have received planning permission (ABP-306602-20) in May 2020, with construction of this scheme recently getting underway.



Figure 2.3: Image Showing the Location of Subject Lands from Belfry Residential Estate
 (Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)



Figure 2.4: Image Showing the Milish Foods Limited Facility from the Belfry Residential Estate
 (Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

2.2 Site Description

The subject lands which are zoned for 'Enterprise and Employment' development are greenfield in nature. Images of the subject lands are provided below for reference.

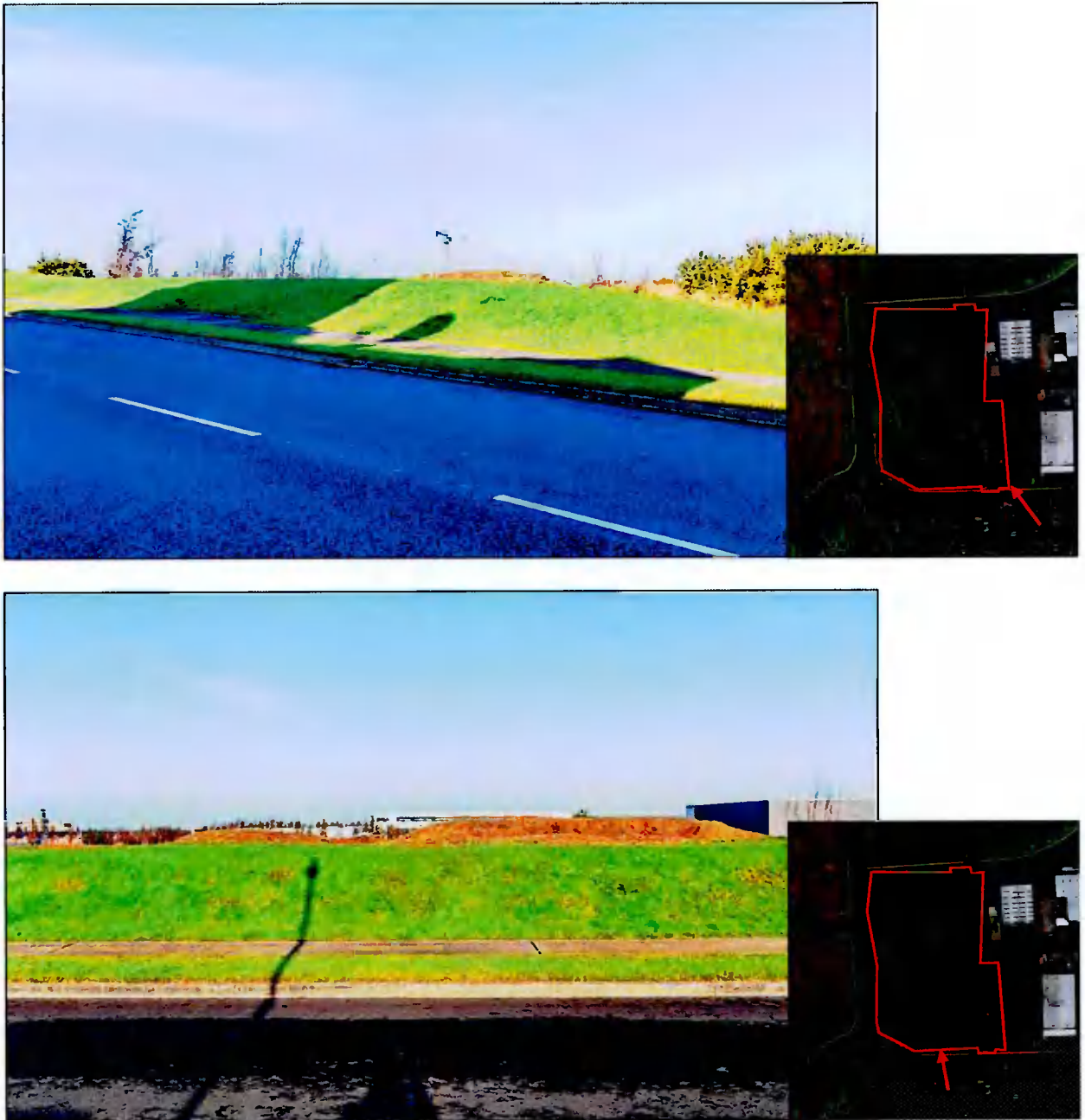


Figure 2.5: Images of the Subject Site

(Source: Photos Provided by 3D Design Bureau, annotated by Thornton O'Connor Town Planning, 2022)

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 we enter a post Covid-19 society 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 as 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

To demonstrate the pent-up demand in the industrial market, 2021 Quarter 3 reports have been included in this rationale for development section. The *Dublin Industrial & Logistics Market Report – Q3 2021* published by Cushman & Wakefield⁹ provided an insight into the impacts of Brexit and Covid-19 on the Industrial and Logistics market at the end of 2021. It outlined that:

'Overall, the outlook for the Dublin industrial and logistics market is positive. Occupier demand is thriving and although availability at present is limited, the emergence of a meaningful volume of development activity will aid in satisfying larger scale requirements in the market.' [Our Emphasis]

The report highlights the impacts of the increased use of online shopping emphasised and induced by the Covid-19 pandemic on the Industrial market:

'A significant driver of the rise in demand in the logistics sector, not only in Ireland but around the world, is this surge in online sales. This structural change has been growing for a number of years; however Covid-19 accelerated this change.' [Our Emphasis].

Although Brexit has caused issues in terms of trade at ports, it has also contributed to the pent-up demand in the industrial and logistics market through Brexit related requirements. The report outlines the effects of Brexit requirements on the Industrial Market:

'These initially emerged in temporary form, for example in the lead up to the deadline the market saw a rise in short term leases as occupiers stockpiled. These temporary impacts have now dissipated, with more long-term requirements evident. For example, the reported creation of an Amazon distribution hub in Dublin, it's first, is widely considered to be in part led, or certainly, accelerated by Brexit.'

The Cushman & Wakefield Q3 2021 report discusses the issue of Industrial land development shortages in the southwest Dublin market, in which the subject development is located:

⁹ <https://www.cushmanwakefield.com/en/ireland/insights/dublin-industrial-and-logistics-market>

Availability levels in the Southwest will be one to watch going forward as market intelligence suggests that land availability in the area is becoming increasingly tight, limiting the volume of construction which may occur in this area going forward. This has led to a lot of developers pushing further out along the N7, something previously not seen in the market.’ [Our Emphasis]

Evidence of dwindling land availability paints a stark warning as existing pent-up demand lingers. Some 70% of stock coming to the market is committed prior to completion, evident in the below 2021 figures of the construction pipeline graph extracted from the *Dublin Industrial and Logistics Market Q3 2021*, published by Savills¹⁰.

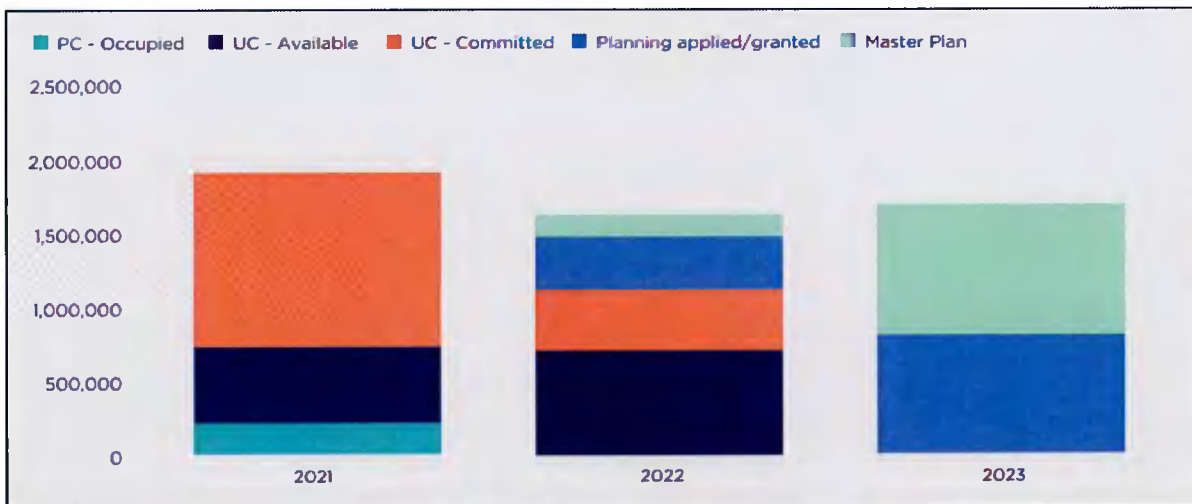


Figure 3.1: Construction Pipeline for the Industrial and Logistics Market in Ireland

(Source: Dublin Industrial and Logistics Market Q3 2021, Savills)

Moving into Quarter 4 of 2021, the *Industrial and Logistics Report* for Q4 2021 published by Colliers¹¹ provides further context around take-up figures for 2021. The impact that a reduced supply of warehouse units is playing in the market is evident:

Industrial take-up in Dublin surpassed 880,000 sq. ft. in the final quarter of 2021, bringing full year take-up to almost 3 million sq. ft. This is low relative to previous years, but this is a factor of limited availability as opposed to low demand.’ [Our Emphasis].

Similarly, quarter on quarter growth was evident in 2021 as stated in the *Dublin Industrial and Logistics* report for Q4 2021, published by CBRE¹²:

¹⁰<https://pdf.euro.savills.co.uk/ireland-research/market-in-minutes/dublin-industrial-and-logistics-market-q3-2021.pdf>

¹¹ <https://www.colliers.com/en-ie/research/q4-2021-industrial-and-logistics-report>

¹² <http://cbre.vo.llnwd.net/grgservices/secure/Dublin%20Industrial%20Figures%20Q4%202021.pdf?e=1645529373&h=bfb9375e169e6e78cfb3f5080982a281>

'Q4 witnessed another strong performance in the Dublin industrial & logistics sector with 82,230m² of transactional activity recorded in the capital in the three-month period. As in the office sector, take-up in the industrial & logistics sector in Dublin increased in each of the four quarters of 2021 with activity hampered only by a shortage of modern accommodation.'

The suitability of the subject site for development within the Magna Business Park is supported in the *Dublin Industrial and Logistics* report for Q4 2021 published by CBRE, as it states:

'The Dublin South West (N7) road corridor once again proved the most dominant location for industrial & logistics activity during Q4 2021, accounting for 46% of transactions recorded in the Dublin market during the final quarter of the year and 41% of annual take-up in the capital in 2021.'

Looking into 2022, the *Market Outlook 2022* published by CBRE¹³ details the impact of the constrained supply on the market which is not expected to subside:

'While we are bullish about another busy year ahead, scarcity of supply will continue to remain a consistent theme throughout 2022 in Dublin, Cork and in provincial locations such as Galway, Limerick, and Waterford where the supply of modern accommodation is expected to remain particularly constrained.'

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

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 southwest County Dublin.

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

The subject site is located in close proximity to many business and industrial parks in the southwest county Dublin region, one of which is Citywest Business Park (located c 1.2km to the north of the subject site). The 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 as a global centre of excellence'*¹⁴.

The N82 (Citywest Road) connects the industrial and business campuses in the Citywest area to the N7 (Naas Road) to the north of the subject site, one of the most important transport corridors

¹³http://cbre.vo.llnwd.net/grgservices/secure/2022%20ireland%20Market%20Outlook%20Low%20Res_DWxy.pdf?e=1645526602&h=cfe25d138f52d80d224ef2ae125a9fd

¹⁴<http://citywestcampus.com/>



between Dublin and the south-west. The N82 (Citywest Road) also connects the subject site to the N81 (Blessington Road) to the south 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 N7, the M50 and the N81 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.

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 revealed that there is 1 No. previous applications pertaining to the northern half of the subject site which was also subject to an Extension of Duration of permission. SDCC Reg. Ref. SDo8A/0588 and its subsequent Extension of Duration of permission (SDCC Reg. Ref. SDo8A/0588/EP) were never commenced and thus the subject site remains an undeveloped site.

No.	SDCC Ref.	Reg.	Date Lodged	Description	Decision Date	Decision
1.	SDo8A/0588		21 st August 2008	A light industrial / storage warehouse unit with 3 No. storey ancillary offices plus a single storey standalone ESB Sub-station, car parking and associated site development works.	25 th November 2008	Grant Permission
2.	SDCC Ref. SDo8A/0588 /EP	Reg.	18 th October 2013	A light industrial/storage warehouse unit with 3 No. storey ancillary offices plus a single storey standalone ESB Sub-station, car parking and associated site development works.	3 rd December 2013	Grant Extension of Permission



Figure 4.1: SDCC Planning Database Map, Subject Site Outlined in Red

(Source: South Dublin County Council Planning Database, annotated by Thornton O'Connor Town Planning, 2022)

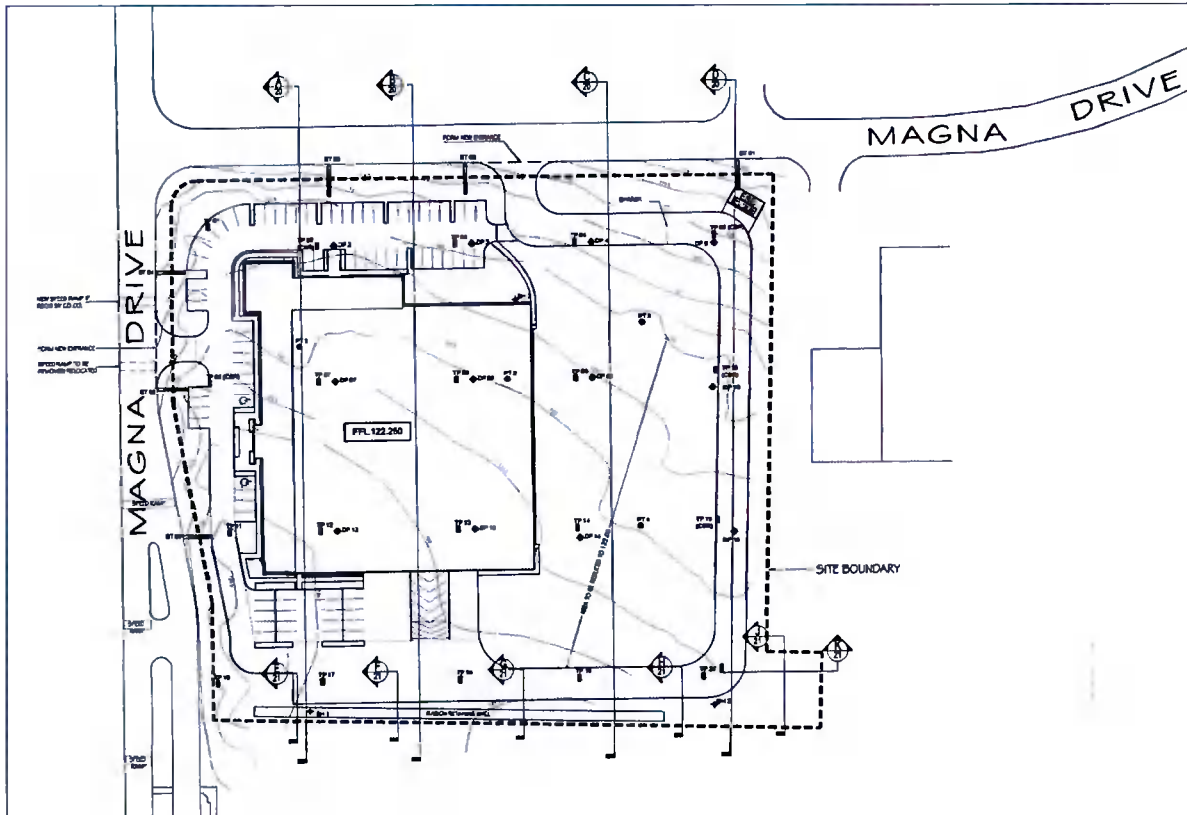


Figure 4.2: Site Plan Submitted with SDCC Reg. Ref. SDo8A/0588

(Source: South Dublin County Council Planning Database)

The Planning Officer in assessing the previous 2008 application at the subject site described the general environs as:

'The area of the application site is characterised by the adjacent business park to the east and north-east and further open scrubland to the west. The buildings in the business park generally comprise double and triple height warehouse buildings with the exception of the substantial office and warehouse building on the opposite (north) side of Magna Drive, which includes a 2-4 storey office element. The buildings in the business park are low rise and bulky in nature and set back from road frontages behind surface parking and truck circulation/hard standing areas/.

The business park is bound by residential development (apartment blocks and houses) to the south, west and the north. The Citywest Shopping Centre is located further to the north-west at the junction between Fortunestown Lane and the Citywest Road.'

In assessing the height of the 2008 proposal, the Planning Officer commented:

'The triple height/3 storey building would have a height of circa 14 metres and would generally match that of surrounding development, which includes triple height and 4 storey development on the sites located to the north on the opposite side of Magna Drive. The height of the proposal is therefore acceptable.'

The Planning Officer considered the design of the building to be acceptable and commented the following:

'The proposed building would be standard triple height portal frames warehouse building with the exception of the proposed 3 storey flat roof office element that would wrap around the front (west) and side (north) elevations of the building.

The portal frames warehouse element would be clad with horizontal metal wall panels, which would generally match that of surrounding warehouse buildings.

The L-shaped office element would be finished with red brick, curtail walling and a smooth render finish. The differentiation of design and quality of building finishes would articulate the front and side (north) elevation of the building on an acceptable manner.'

The Planning Officer concluded by recommending that permission be granted for the development. The life of the permission was subsequently extended in accordance with the provisions of Section 42 of the *Planning and Development Act* (as amended). It expired on 25th November 2018.

4.2 Overview of Relevant Planning History of Nearby Sites in Magna Business Park

The South Dublin County Council online search facility details several relevant industrial and residential developments in close proximity to the subject lands and in Magna Business Park. The most relevant planning applications are shown in Figure 4.3 and the accompanying table below.



Figure 4.3: Aerial Photograph identifying Relevant Planning Applications in the Immediate Vicinity.

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

No.	SDCC Reg. Ref.	Date Lodged	Description	Decision Date	Decision
3.	SD05A/0050	27 th January 2005	Site development works to include the construction of a new section of road , surface water sewer and utility services to service industrially zoned lands at Magna Business Park.	3 rd May 2005	Grant Permission
4.	SD05A/0219	23 rd March 2005	Distribution warehouse unit incorporating two storey ancillary offices and showroom , with associated service yard, car parking and site development work including an internal ESB sub-station.	16 th May 2005	Grant Permission
5.	SD05A/0205	31 st March 2005	Industrial unit with a footprint of 5200 sq m with two storey offices to the south . The overall floor area including the first-floor office accommodation is 5761 sq m. with an overall height generally of 8.13m to	24 th May 2005	Grant Permission

			the eaves and a 10m overall height to the office section of the development. The development includes three depressed loading docks and one on-grade door, an external water storage tank, a wastewater holding tank, a compressor room, a sprinkler tank and pump house and a nitrogen farm, all located to the rear of the facility. The application also includes all necessary roads, hard standings, car parking and ancillary works together with access road to the facility from the Magna Business Park roundabout		
6.	SD05A/0315	6 th May 2005	Extension to the existing warehouse of a total area of 1,685 sq m , truck parking area; loading yards and loading docks; connection to water supply, foul sewer/surface water drainage; site development and landscape works; all on a site of 1.6 hectares in the townland of Fortunestown.	30 th June 2005	Grant Permission
7.	SD05A/0534	6 th July 2005	Construction of 3,200 sqm food manufacturing facility incorporating dry goods storage and cold storage facility and two storey ancillary offices with associated service yard, car parking and site development work with an internal E.S.B Sub-station. The end used may require a license to discharge trade effluent.	5 th October 2005	Grant Permission
8.	SD17A/0451	19 th December 2017	Warehouse extension of approximately 2,588sq.m to the south of the existing warehouse, a photovoltaic panel array installed on the proposed warehouse extension roof, an extension to an existing dispatch to the north-west of the building and a single storey raised open deck (car-park structure over existing ground level carpark resulting in a cumulative loss on site of approx. 6 No. car spaces together with ancillary works including site landscaping and drainage.	20 th February 2018	Grant Permission
9.	SD21A/0238	27 th August 2021	Change of use of the existing warehouse/distribution facility to a light industrial use facility for the production, assembly and distribution of plastic assemblies for healthcare and biopharmaceutical industries.	21 st October 2021	Grant Permission

10.	SHD3ABP-306602-20 Adjacent Site at Western Boundary; Citywest Road and Magna Drive	10 th February 2020	Construction of 463 No. dwellings comprising 353 No. apartments, 89 No. houses and 21 No. duplex apartments, creche and community building. Vehicular access to the proposed development will be from the Citywest Road (N82) and will include pedestrian crossings and works to facilitate access secondary vehicular and pedestrian access to boundary to lands to north (currently under construction) and pedestrian to boundary to Magna Drive.	26 th May 2020	Grant Permission
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4.2.1 Adjacent Site at Western Boundary; Citywest Road and Magna Drive - SHD Development - SHD3 ABP-306602-20 (463 No. dwellings)

A key application of relevance is a relatively recent permission granted to Glenveagh Homes for a significant residential development on lands to the west of the subject site. The details of the permission are set out below:

Reg. Ref	SHD3 ABP-306602-20
Applicant	Glenveagh Homes Limited
Application Date	10 th February 2020
Address	Citywest Road and Magna Drive, Citywest, Dublin 24
Description of Development	Construction of 463 No. dwellings comprising 353 No. apartments, 89 No. houses and 21 No. duplex apartments, creche and community building. Vehicular access to the proposed development will be from the Citywest Road (N82) and will include pedestrian crossings and works to facilitate access secondary vehicular and pedestrian access to boundary to lands to north (currently under construction) and pedestrian to boundary to Magna Drive.
ABP Decision	Grant Permission subject to 25 No. conditions
Decision Date	25 th May 2020

The Inspector in assessing the site context noted that a wide range of mixed uses encompass the surrounding area including the Magna Business Park to the east, the Citywest Shopping Centre to the west and a four storey apartment building to the south of the site on the opposite side of Magna Drive.

The assessment included a review of the boundary treatments with the Inspector noting that:

'A third party submission raised concern in relation to the boundary treatment proposed along Magna Drive, in particular the 1.5m high mesh panel fence. The proposed boundary treatment along City West Road and Magna Drive south includes a low granite dwarf faced wall with 1.5m high railing, which I

consider should be extended around the entire perimeter of the site to connect through Magna Drive along the east.' [Our Emphasis].

In assessing the impact of the height of the development, the Inspector noted that the development which included heights of 7 No. storeys is above the Department of Defences chosen datum although the aeronautical report concludes that the site lies well outside any approach for the Casement Aerodrome and the area above the site is precluded for any circling of aircraft.

The development was granted permission by An Bord Pleanala and the submitted Site Layout and its position relative to the subject lands is shown in Figure 4.4 below.

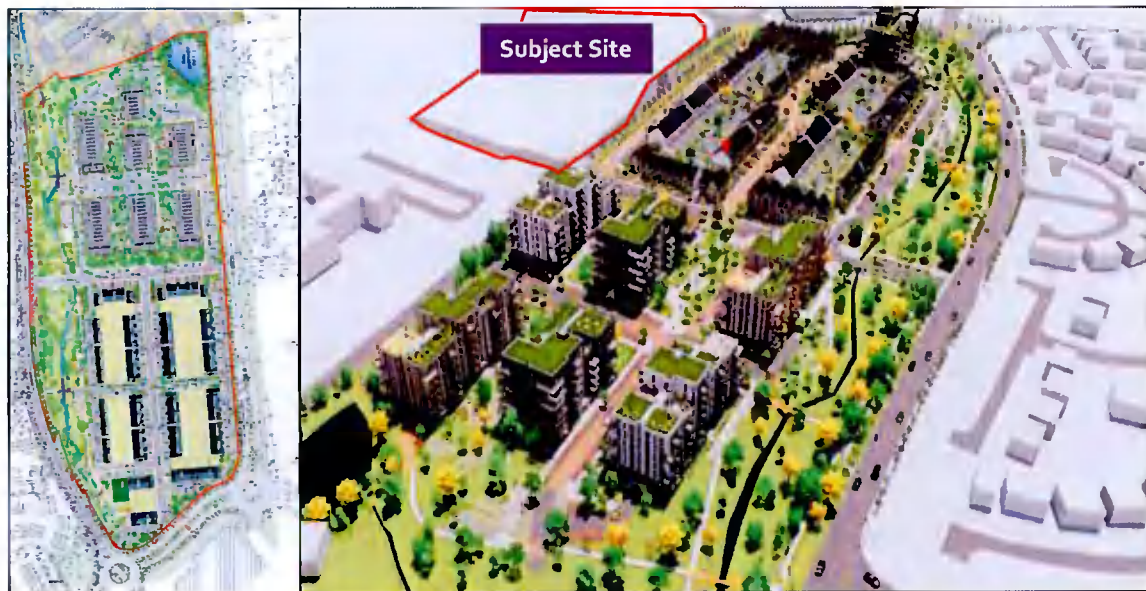


Figure 4.4: Proposed Site Plan Layout under SHD3 ABP-306602-20

(Source: Extract from ABP-306602-20, annotated by Thornton O'Connor Town Planning, 2022)

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 residential uses and industrial/warehousing uses on surrounding land holdings. The Citywest area provides a strong employment base for South Dublin and with the continued growth in population in the area through the provision of additional housing there is the means to create more sustainable live work patterns in Citywest. As detailed in the accompanying reports submitted with this application, the proposed warehouse development has been designed to ensure that it is fully respectful of both existing and permitted residential development in the local area.



The proposed development seeks to construct a warehouse with ancillary office space and staff facilities with a maximum height of 15.5 m. It is noted that warehouses in excess of 16 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 a 3 No. storey warehouse development which includes:

Uses	Proposed
Warehouse	12,568 sq m
Ancillary Offices	498 sq m
Staff Facilities	538 sq m
Total:	13,604 sq m

The total area of the warehouse with ancillary offices is therefore proposed to be 13,604 sq m with an internal height of 12 metres and overall maximum height of 15.5 metres.

Ancillary Development

The development will also include: a vehicular and pedestrian entrance to the site from Magna Avenue, a separate HGV entrance from Magna Drive; 69 No. ancillary car parking spaces; covered bicycle parking; HGV parking and yards; level access goods doors; dock levellers; access gates; signage; hard and soft landscaping; lighting; boundary treatments; ESB substation; sprinkler tank and pump house; and all associated site development works above and below ground.

The provision of the HGV access route will require the removal of 5 No. street trees. It is noted that the previously permitted warehouse at the subject lands (SDCC Reg. Ref. SD08A/0588) also proposed an access/egress to Magna Drive to the North.

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

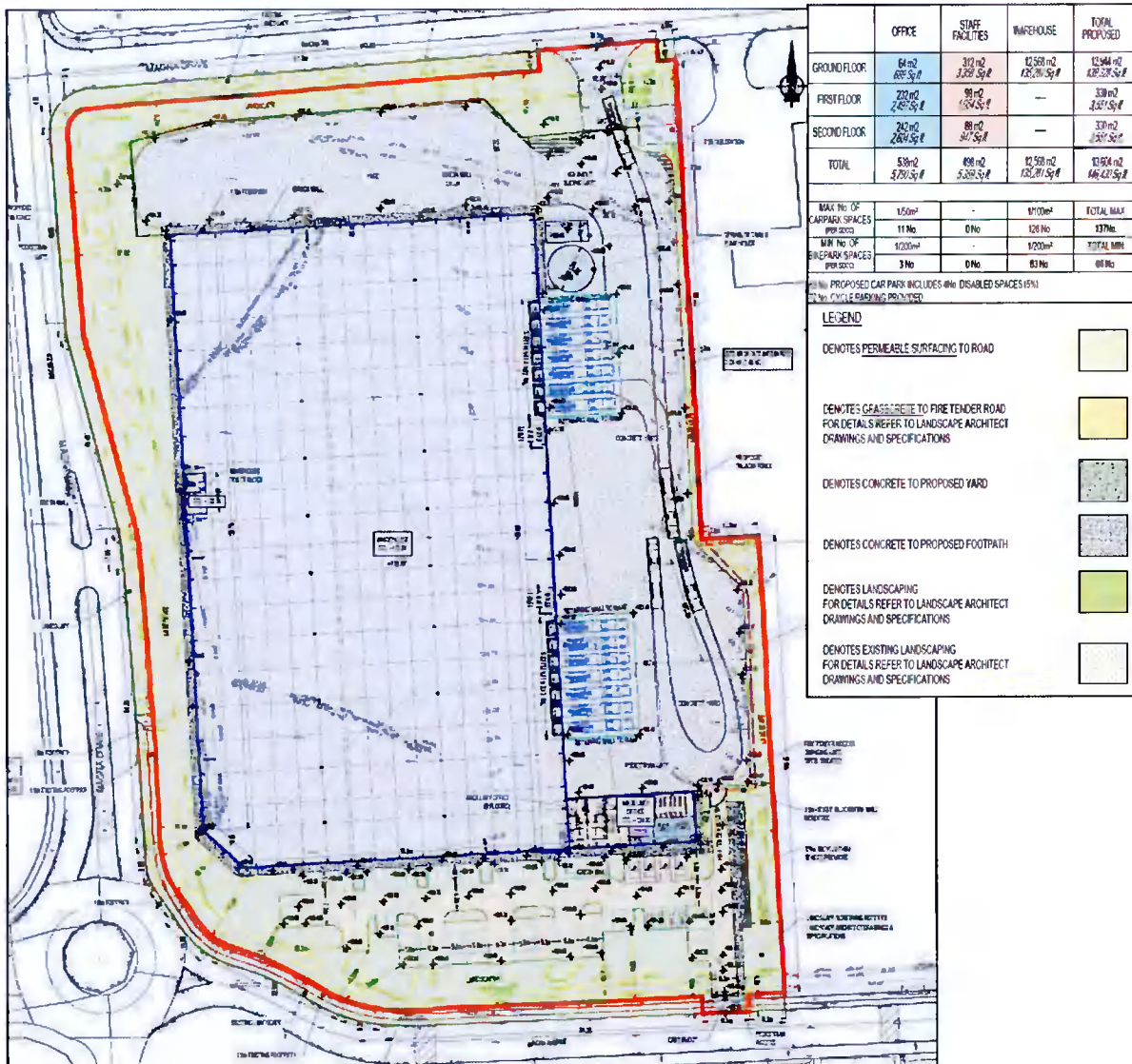


Figure 5.1: Proposed Site Layout Plan, Drawing No. D1720-D2-PL1

(Source: Kavanagh Burke Consulting Engineers, 2022)

5.2 Key Site Statistics

Total Area of Subject Land	3.03 Ha (c. 30,300 sq m)
Total Gross Floor Area	13,604 sq m
Site Coverage	42%
Plot Ratio	0.4:1
Car Parking	69 No. spaces

Visualisations of the proposed scheme are provided below:



Figure 5.2: Verified Views Nos. 1 and 3

(Source: 3D Design Bureau)

5.3 Design Rationale

A Design Statement that has been prepared by Kavanagh Burke Consulting Engineers is enclosed as a separate document. The Design Statement sets out the rationale for key development concepts. The Site Layout was informed by adjacent sensitivities as detailed below:

'The existing adjacent developments were a strong influence on how this proposal was positioned on site, accessed and screened. The fundamental design consideration was to provide the HGV access and associated yard towards the rear (north) furthest away for the dwellings. Also, where the site bounds Magna Avenue opposite the existing dwellings, provide a structural screen to the HGV activity with the ancillary office accommodation and associated carparking. These ancillary offices are located as shown on the site plan to provide the aforementioned structural screen between the dwellings and HGV activity, the latter being an essential part of the warehousing operations. It then follows that the carpark access is located to the south with the HGV access located to the north remote from the existing residential development.'

In relation to materials the report sets out that:

'The materials proposed are intentionally simplistic. Experience demonstrates that clear sharp lines, crisp functional detailing, a limited range of surface materials and a restricted palette of neutral colours combine most effectively to reduce the perceived mass of these types of buildings.'

The Design Statement also includes a Landscape and Visual Screening Statement which concludes that it is not considered that more intensive or detailed townscape and visual assessment is required for the proposed development and can be screened-out of further assessment.

5.4 Landscaping

The subject lands have been subject to significant landscaping measures to ensure that the proposed warehouse and the respective curtilages are appropriately screened from the public realm. An extract from the Landscape Masterplan is provided below:

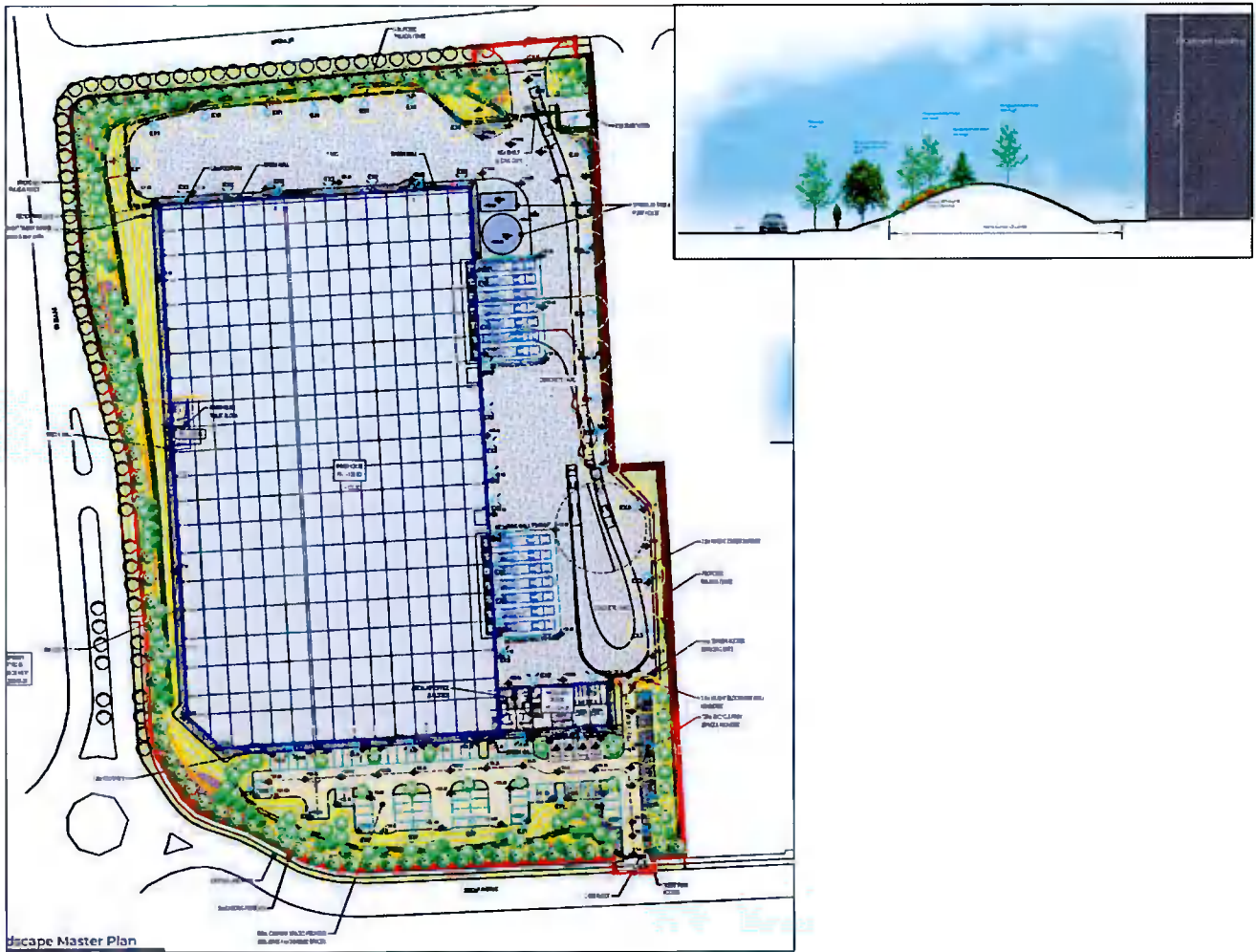


Figure 5.3: Proposed Landscaping Masterplan.

(Source: Enviroguide, 2022)

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

'The landscape design proposal has also taken consideration of the distinctive landscaping used in surrounding industrial sites and throughout the Citywest Business Park. Undulating mounds and mature planting are used to provide visual interest that draws the viewers eyes away from the building. This landscaped transition zone dominates the visual experience of the viewer whilst helping to maintain passive surveillance.'

It is proposed that the southern, western and northern boundaries of the site have a undulating grassed earth berm with mature planting dominating the road side edges. The existing lime tree avenue will be further strengthened with additional lime tree planting and the rest of the proposed planting has native and/or pollinator friendly benefits.'

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

'It is considered that provided the mitigation measures proposed are carried out in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the Proposed Development.'

'Based on the successful implementation of these measures and proposed works, to be carried out in accordance with the landscape plan, there will be no significant negative ecological impacts arising from Construction and Operational Phases of the Proposed Development.'

The proposed landscaping measures will play a key role in ensuring that the warehousing development will assimilate into the existing parkland style industrial campus environment, is designed in accordance with acoustic screening requirements with berms strategically placed to protect the amenity of adjacent residential properties and will also ensure that the ecological integrity of the subject site is not 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 South Dublin area where many 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 Magna Drive. This proposed network collects the sewage on site from the proposed unit and ancillary office/staff facilities. Connection to the existing foul sewer network is proposed to the eastern site boundary at the existing foul sewer manhole at the footpaths of Magna 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 150mm watermain on site, at Magna Avenue, the exact connection locations shown on accompanying drawing reference D1720 D3 Drainage and Watermain Layout.'

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

5.6 Traffic and Transportation

The proposed scheme provides 69 No. car parking spaces to serve the warehouse. It is noted that the car parking requirements as set out in *the South Dublin County Council Development Plan 2016 - 2022* are discussed at Section 6.6 of this report.

Stephen Reid Consulting Engineer outlines in the enclosed transport report that:

'An access on the south east corner of the site (On Magna Avenue) will provide pedestrian, cycle and vehicle access to the car park with a separate access on the north east corner of the site (on Magna Drive) serving the delivery yard for vans and HGVs.'

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 existing public road network and the proposed access arrangements and internal layout measures without 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.

6.0 PLANNING CONTEXT

6.1 *South Dublin County Council Development Plan 2016 – 2022* 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 Magna Avenue and Magna Drive, Citywest, 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’.

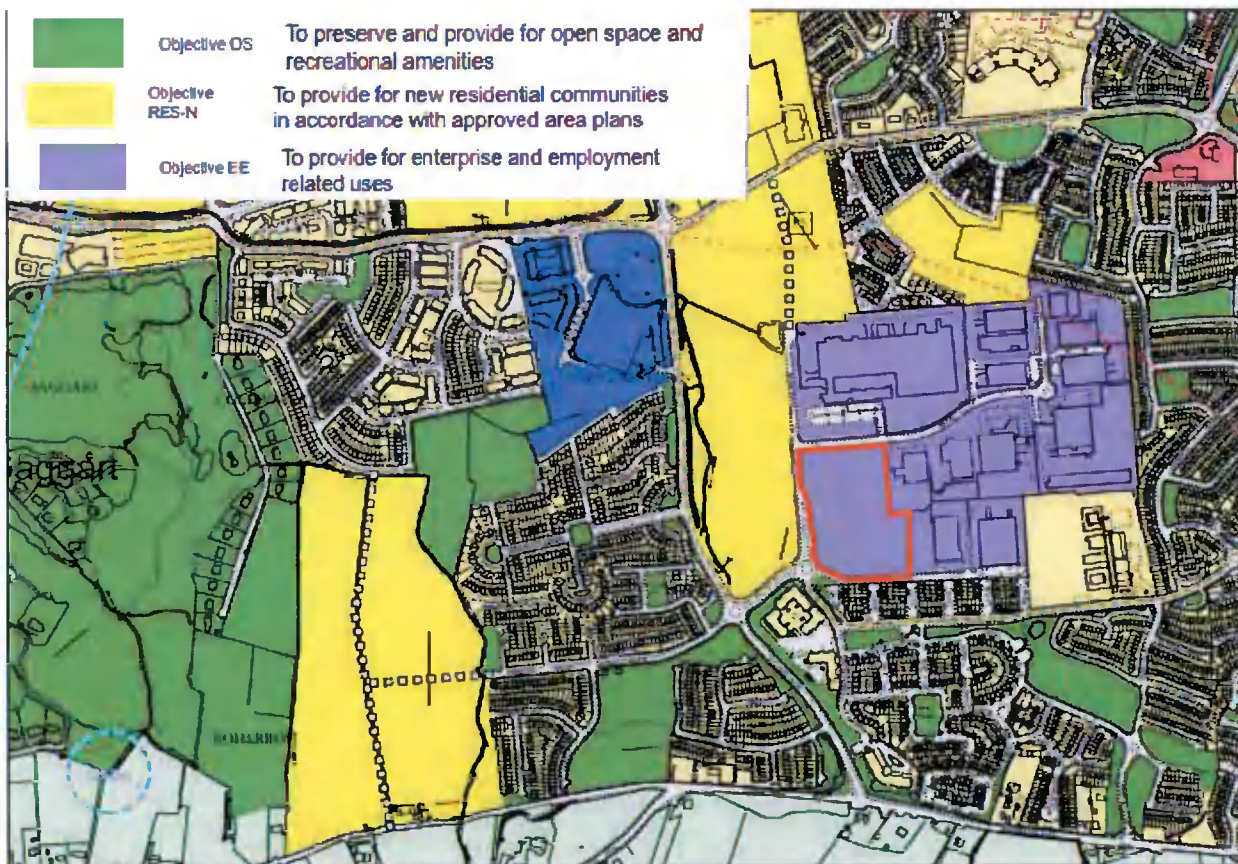


Figure 6.1: SDCC Zoning Map No. 4, Subject Site Outlined in Red

(Source: *South Dublin County Council Development Plan 2016-2022*, annotated by Thornton O'Connor Town Planning, 2022)

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 a warehouse with ancillary office space and staff facilities at the subject site is effectively infilling/completing 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.

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 with sustainable materials and treatments.

6.4 Relevant Policies of the *Draft South Dublin County Council Development Plan 2022-2028*

The following additional policies of the *Draft South Dublin County Development Plan 2022-2028* are relevant to the proposed development:

Policy	It is a policy of the Council:
QDP12 Objective 3:	<i>'To ensure that new development builds on or enhances the streetscape, landscape character and open space network of the settlement through high quality design and landscaping.'</i>
QDP12 Objective 4:	<i>'To promote appropriate development that enhances the character and vitality of the existing settlements and which does not negatively impact on existing residential amenity.'</i>
SM7 Objective 9	<p><i>'To ensure that car parking is designed in such a manner as to promote visual amenity, green infrastructure, carbon sequestration and sustainable drainage (SuDS) by applying the following requirements:</i></p> <ul style="list-style-type: none"> <i>- Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species;</i> <i>- Provision of not more than two parallel or five perpendicular spaces between trees/planting bays;</i> <i>- Use of permeable paving, where appropriate.'</i>

EDE1 Objective 6:	<p><i>'To ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions by supporting and promoting the following measures:</i></p> <ul style="list-style-type: none"> - <i>An increase in employment densities within walkable distances of communities and on public transport routes;</i> - <i>Promotion of walking and cycling and use of public transport through increased permeability and mobility management measures within and outside employment areas;</i> - <i>The sourcing of power from district heating and renewables including wind and solar.</i> - <i>Additional native tree planting and landscaping on existing and proposed enterprise zones and development sites to aid with carbon sequestration, contribute to the green infrastructure network of the County and promote quality placemaking.</i>
EDE5 Objective 6	<p><i>'To ensure that business environments are facilitated according to the needs of sectors; whether they be place making objectives in urban settings or campus style landscapes that compliment certain pharmaceutical and hi-tech industries.'</i></p>
EDE5 SLO1	<p><i>'To ensure that the campus style environment in Citywest is maintained to promote and attractive landscaped setting for the existing and future business within the business park.'</i></p>

The proposed scheme is in accordance with the relevant policies of the Development Plan and the Draft Development Plan as set out 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.

6.5 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 proposed warehouse will have a maximum height of 15.5m and thus is in accordance with the building heights of surrounding warehousing in the vicinity. As noted in Section 4.3 of this report, higher warehousing developments have been permitted in the vicinity including SD18A/0266 where heights of up to 17.65 m were permitted by South Dublin County Council. Also, as detailed in Section 4.2 of this report, a large scale residential development including heights of up to 7 No. storeys has been permitted to the west of the subject lands (ABP-306602-20).

The design of the development has arranged the office as both a visual and noise screen of the HGV yard as viewed from existing residential development to the south. Furthermore, substantial berms/mounds are proposed along the site boundaries to screen car parking areas and reduce the visual impact of the development.

6.6 Car Parking and Cycle Parking

6.6.1 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 Assessment of Car Parking provision is also detailed in Section 3.3 of the separately enclosed Traffic Impact Assessment prepared by Stephen Reid Consulting. It details that based on the maximum standards set out above, the proposed development generates a maximum of 137 No. spaces if warehousing and ancillary office are separately calculated. However, if the assessment is based on the warehouse standard only (as the office is ancillary), a maximum car parking demand of 136 No. spaces is generated.

It is proposed to provide 69 No. car parking spaces including 4 No. accessible spaces. This is considered to be an acceptable provision in the interests of sustainable development. It should also be noted that there is provision for 5.7% of the spaces (4 No. spaces) to be for EV use and installed with EV charging points with ducting to facilitate future expansion of the EV charging equipment if demand arises.

6.6.2 Cycle Parking

The scheme requires a minimum of 66 No. cycle parking spaces (office and warehouse standard) or 68 No. spaces (warehouse standard only). It is proposed to provide 72 No. covered cycle parking spaces as part of the scheme.

Lockers, showers and changing rooms are provided for within the staff welfare area.

6.7 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.'

Magna Business Park 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 immediate surrounding area. 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.



6.8 Summary of Planning and Development Context

The proposed development to provide a warehouse with ancillary office and staff facilities is in accordance with the zoning objective pertaining to the site as the proposed development will introduce significant employment to the local area. 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 2022*.

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 22nd February 2022 which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2022*.
- One copy of the Site Notice dated 22nd February 2022 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 23rd February 2022.

7.4 Planning Report

- Six copies of this *Planning Report*, prepared by Thornton O'Connor Town Planning, dated 23rd February 2022.

7.5 Appropriate Assessment by Enviroguide

- An Appropriate Assessment Screening Report carried out by Enviroguide dated February 2022.

7.6 Flood Risk Assessment by Enviroguide

- A Flood Risk Assessment Report conducted by Enviroguide, dated February 2022.

7.7 Ecological Impact Assessment by Enviroguide

- An Ecological Impact Assessment prepared by Enviroguide, dated February 2022.



7.8 Tree Assessment Report and Drawings by Enviroguide

- Tree Assessment Report and Drawings prepared by Enviroguide, dated February 2022.

7.9 Noise Assessment Report by Enviroguide and Decibel Noise Consultants

- Noise Assessment Report and Drawings prepared by Decibel Noise Consultants dated February 2022.

7.10 Traffic Reports Prepared by Stephen Reid Consulting Traffic and Transportation

- Report entitled '*Traffic Impact Assessment*', dated February 2022; and
- Report entitled '*Outline Workplace Travel Plan*', dated February 2022.

7.11 Sustainability Report by Axiseng Consulting Engineers

- Part L Compliance Report dated February 2022 and

7.12 Daylight Sunlight and Overshadowing Assessment by BPC Engineers

- Daylight, Sunlight and Overshadowing Assessment dated February 2022

7.13 Architectural Design Statement by Kavanagh Burke Consulting Engineers

- A Design Statement prepared by Kavanagh Burke Consulting Engineers dated February 2022

7.14 Drainage Design Statement by Kavanagh Burke Consulting Engineers

- A Drainage Design Report prepared by Kavanagh Burke Consulting Engineers dated February 2022.

7.15 3D Imaging, Verified Views and Photomontages by 3D Design Bureau

- 4 No. Photomontages of the proposed development dated February 2022.

7.15 Drawings

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

Kavanagh Burke Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
D1720-D1-PL1	Site Location Map	1:1000	A0
D1720-D2-PL1	Site Layout Plan	1:500	A0
D1720-GA-A01-PL1	Ground Floor Plan	1:200	A0
D1720-GA-A02-PL1	First Floor Plan	1:200	A0
D1720-GA-A03-PL1	Second Floor Plan	1:200	A0
D1720-GA-A04-PL1	Ancillary Office & Warehouse Toilet Block	1:100	A1
D1720-GA-A05-PL1	Section AA & Section BB	As Shown	A2
D1720-GA-A06-PL1	Elevations	1:200	A1
D1720-GA-A07-PL1	Contiguous Elevation	1:200	A1
D1720-GA-A08-PL1	Contiguous Elevation	1:200	A1
D1720-GA-A09-PL1	Covered Bike Park	1:50	A4

Enviroguide Consulting			
Drawing No.	Drawing Title	Scale	Size
P-01	Landscape Masterplan & Section	As Shown	A1
P-02	Sections	As Shown	A1
P-03	Landscape Planting Details	As Shown	A1
P-04	Tree Constraints and Protection	As Shown	A1

Axiseng Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
MGN-X-XXX-DR-AXE-EE-60103	Site Plan Lighting Services	1:500	A1



8.0 CONCLUSION

The proposed development represents a significant investment providing a warehouse 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".

Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

