

AMMG PROPY **Planning Report** In respect of the development of a warehouse unit with ancillary office and staff facilities and associated development At a c. 2.56 Ha site at Kingswood Road and Kingswood Avenue, Citywest Business Campus, Dublin 24. Submitted on Behalf of Rockface Developments Limited

June 2022

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



Monday, 27th June 2022

Dear Sir/ Madam

Re: APPLICATION FOR PERMISSION FOR THE PROVISION OF A WAREHOUSE DEVELOPMENT AT A C. 2.56 HA SITE AT KINGSWOOD ROAD AND KINGSWOOD AVENUE, CITYWEST BUSINESS CAMPUS, DUBLIN 24

1.0 INTRODUCTION

1.1 Application for Development

Rockface Developments Limited¹ has retained Thornton O'Connor Town Planning² in association with Kavanagh Burke Consulting Engineers³, Enviroguide Consulting⁴, 3D Design Bureau⁵, Stephen Reid Consulting Traffic and Transportation Limited⁶, O'Dwyer & Jones Design Partnership (Aviation Planning Consultants)², BPC Engineers®, RSK Ireland Limitedց and Axiseng Consulting Engineers¹o to prepare this application for permission for development to provide a warehouse at a c. 2.56 Ha site at Citywest Business Campus, Citywest, Dublin 24.

The lands are generally bounded to the south-east by Kingswood Avenue, to the south-west by an ancillary car park associated with Citywest Business Campus, to the north-west by Kingswood Business Centre and Ardsolus Residential Development and to the north-east by Kingswood Road.

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

² 1 Kilmacud Rd Upper, Dundrum, Dublin 14, D14 EA89

³ Unit G3, Calmount Park, Ballymount, Dublin 12

^{4 3}D Core C, Block 71, The Plaza Park West, Dublin, D12 F9TN

^{5 65} Rock Rd, Blackrock, Dublin, A94 PT62

⁶ Estuary House, New Street, Malahide, Co. Dublin.

^{7 28} Leeson Park, Dublin 6, Ireland

^{8 19-22} Baggot Street Lower, Dublin 2, Ireland, Do2 X658

⁹ Bluebell Business Centre, Old Naas Rd, Inchicore, Dublin 12, D12 TN30

¹⁰ No. 47 Mount Street Upper, Dublin 2



1.2 Summary of the Proposed Development

The development will comprise the provision of a warehouse with ancillary office and staff facilities and associated development. The warehouse will have a maximum height of 18 metres with a gross floor area of 11,691 sq m including a warehouse area (10,604 sq m), ancillary staff facilities (499 sq m) and ancillary office area (588 sq m).

The development will also include: a vehicular and pedestrian entrance to the site from Kingswood Road to the north-east; a separate HGV entrance from Kingswood Avenue to the south-east; 64 No. ancillary car parking spaces; bicycle parking; HGV parking and yard; level access goods doors; dock levellers; access gates; hard and soft landscaping; canopy; lighting; boundary treatments; ESB substation; plant; 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, Description and Accessibility | Section 2.0; |
|---|---|------------------|
| • | Rationale for Proposed Development | Section 3.0; |
| • | Planning History | Section 4.0; |
| • | Description of the Proposed Development | Section 5.0; |
| • | Planning Policy | Section 6.o; |
| • | Planning Administration | Section 7.0; and |
| • | Conclusion | Section 8.o |

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 Kingswood Road, Citywest 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/Carton 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 Report is submitted as a standalone document with this planning application.



2.0 SITE LOCATION, CONTEXT, DESCRIPTION AND ACCESSIBILITY

2.1 Site Location

The primarily greenfield subject site, which has an area of 2.56 Ha, is located to the south of the N7 National Road (Naas Road) and to the east of the Citywest (N82) junction. The site is bounded to the north-west by Kingswood Business Centre and Ardsolus residential development, to the south-west by a carpark associated with the Citywest Business Campus, to the north-east by Kingswood Road and to the south-east by Kingswood Avenue. A map showing the location of the subject site 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, 2022

2.2 Site Context

The surrounding area is commercial and residential in nature. With regard to the commercial context, the subject site is located within Citywest Business Campus and there are a number of business parks in the vicinity, most notably Baldonnell Business Park and Greenogue Business Park located to the west of the subject site. The Citywest Campus Luas stop is located c. 850 metres as the crow flies from the subject site (c. 1.2 Km/ c. 14 minute walk).

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



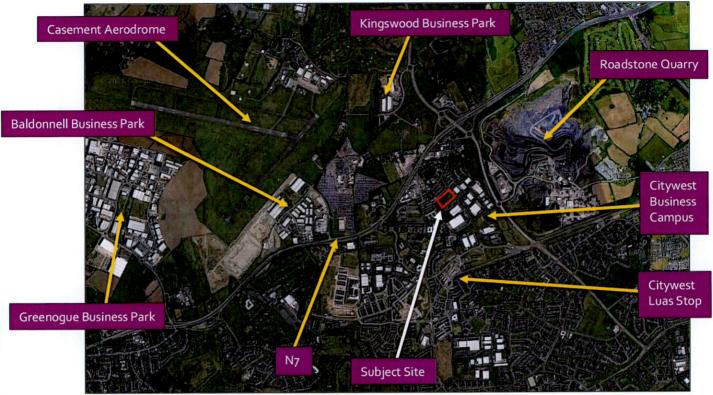


Figure 2.2: Aerial Photograph Identifying the Surrounding Context of the Subject Site (Red Line of the Subejct Site is Indicative Only)

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

Kingswood Business Centre is located to the north-west of the subject site. The residential context includes the Ardsolus Residential Development located to the north-west of the subject site and comprises 2 No. storey detached, semi-detached and terraced properties. Further north of the subject site lies the Silken Park Residential Development comprising predominantly 2 No. storey dwellings and 3 No. storey apartment blocks.





Figure 2.3: Aerial Photograph Identifying Residential Context of the Subject Site

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

2.3 Site Description

The subject site is zoned 'Enterprise and Employment' in the *South Dublin County Development Plan 2016-2022*. The lands are rectangular in shape and are primariliy greenfield in nature, with a portion of the site covered by an area of hardstanding. The subject site has a generally flat topography and images of the site have been provided below for reference.



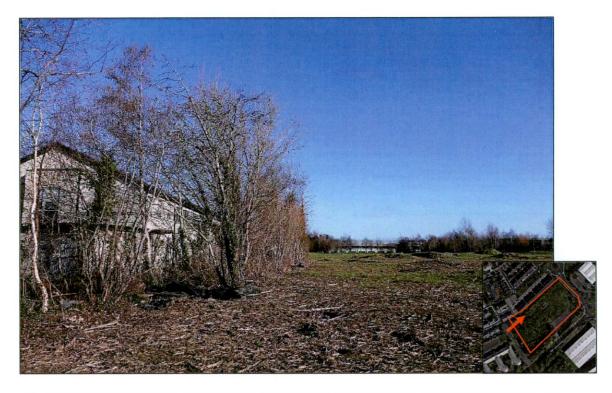




Figure 2.4 - 2.5: Images of the Subject Lands with Insert identifying the Direction of the

Source:

Enviroguide Consulting Images, annotated by Thornton O'Connor Town

Planning, 2022



2.4 Site Accessibility

The subject site is well served by public transport with Dublin Bus and Luas stops all within walking distance of the subject site. Existing and proposed public transport provision will be set out in the following subsections.

2.4.1 Luas Light Rail

The subject site is located in close proximity to the following Red Line Luas stops:

- Citywest Campus: c. 850 metres as the crow flies (c. 1.2 Km/ c. 14 minute walk)
- Cheeverstown: c. 950 metres as the crow flies (1.1 Km walk/ c. 13 minute walk)

The Red Line Luas allows easy access to a significant quantum of locations to the east and west of the City Centre, in addition to the opportunity for users to change onto the Green Line Luas at O'Connell Street/Abbey Street which provides access North and South of Dublin City and North and South of Dublin County.

2.4.2 Existing Bus Services

The subject site is currently served by the following bus services which can be accessed along Kingswood Avenue and Citywest Road.

- Route No. 65B Citywest to Poolbeg Street (1 No. hour at Peak)
- Route No. 69 Rathcoole to Hawkins Street (1 No. Hour at Peak)
- Route No. 77A Citywest to Ringsend Road (20 No. minutes Frequency)
- Route No. 77X Citywest to UCD Belfield (1 No. Daily Morning Service)
- Route No. 175 Citywest to UCD Belfield (Half-hourly Service)



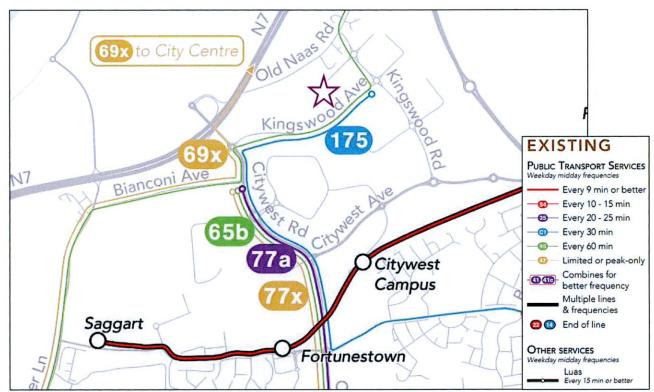


Figure 2.6: Existing Bus Services (Subject Site Indicatively Identified by a Star)

Source: BusConnects.ie, annotated by Thornton O'Connor Town Planning, 2022

2.4.3 Improvements to Public Transport

Proposed Bus Connects

Bus Connects is a national program for investment in the bus network of the Greater Dublin Area. The emerging plan for this significant upgrade involves the following:

- Core Bus Network Redesign (New Routes/Improved Frequency/ More Buses);
- Core Transport Corridor Upgrades (240km of upgrades over 16 No. Quality Bus Corridors, including cycle lanes and bus priority); and
- Integrated ticketing and fares with Luas, DART and Commuter Rail.

Proposed Network Redesign

Three rounds of public consultation concluded in 2020 which resulted in a redesigned network comprising 8 No. Route Spines (with additional spurs/branches), increased local/ feeder route coverage, orbital routes, and peak-time only express services.

As can be seen in the Table below, the following proposed bus routes are of relevance to the subject site:



| Preferred Bus Routes | | | |
|---------------------------|---|--|--|
| Bus Route: | Destinations: | Weekday Frequency: | |
| Route Spine | Route Spines | | |
| Route No. D2: | Clare Hall - City Centre - Citywest | 15 No. Minutes (6am-10pm) | |
| Other City I | Bound Routes | 2015年10日 - 10日本 10日本 10日本 10日本 10日本 10日本 10日本 10日本 | |
| Route No. 58: | Rathcoole - City Centre - Dublin Port | 1 No. Hour (6am- 11pm) | |
| Orbital Rou | tes | | |
| Route No. S8: | Tallaght - Sandyford - Dún Laoghaire | 15-30 No. minute frequency (6am- 10pm) | |
| Route No. W4: | Blanchardstown Shopping Centre - Liffey Valley - Grange Castle Rd - Tallaght | 15-30 No. minute frequency (6am-10pm) | |
| Route No. W6: | Maynooth - Celbridge - Citywest - Tallaght | 30 No. minute frequency (6am-1opm) | |
| Peak-Only/ Express Routes | | | |
| Route No. X58: | Rathcoole - City Centre | 2 No. trips per hour (subject to future passenger numbers) | |

With regard to the subject site, the following is the emerging preferred route network that will open the site up for greater access to parts of the city it is currently more removed from, increasing employment opportunity and access to services and amenities. The following network diagram depicts the proposed revised network servicing the subject site:

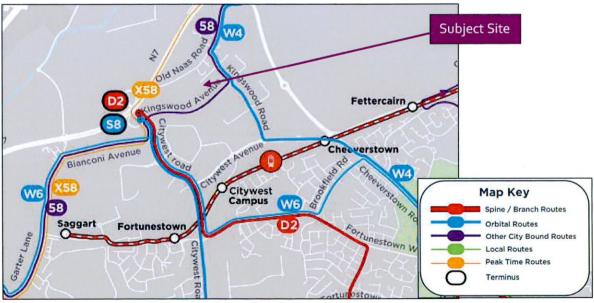


Figure 2.7: Proposed Bus Connects Network Redesign

Source: BusConnects.ie, "New Dublin Area Bus Network Summary Document September 2020", annotated by Thornton O'Connor Town Planning, 2022



3.0 RATIONALE FOR THE PROPOSED 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 the 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.

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

Unprecedented demand in the Industrial and Logistics sector for suitably located warehouse units was experienced in 2021, as the associated supply of units struggled to keep pace. This is reflected in the growth in investment in the Industrial and Logistics sector, as shown in the below Figure 3.1 extracted from the *Market Outlook 2022*²¹ published by CBRE in January 2022.

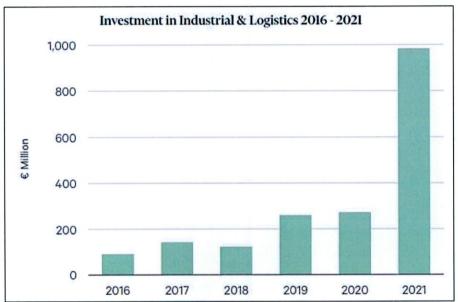


Figure 3.1: Investment in Industrial & Logistics 2016 - 2021

Source: CBRE Research, 2022

Forecasts contained within market outlook reports for 2022 illustrate demand continuing to outstrip supply. The CBRE research also notes the impact of the Covid-19 pandemic and Brexit on the industrial and logistics market:

¹¹ https://www.cbre.ie/en/research-and-reports/Ireland-Market-Outlook-2022



"Macroeconomic recovery and strategies to tackle global supply chain disruptions added heat to an already booming logistics market with the pandemic and Brexit adding further to this momentum in Ireland's case."

CBRE's report continues by detailing the impact of constrained supply on the market, with development beginning to spread outside the major cities:

"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..."

As Industrial and Logistics reports for Quarter 1 of 2022 begin to emerge, the role that a lack of supply is playing in the market is evident. Colliers *Industrial & Logistics Quarterly Report* for Q1 2022 states:

"Industrial & logistics continues to be the star performer with immensely strong occupier and investor demand continuing in Q1 2022. The strength of the occupier market, along with rising build costs and **extremely low availability** have been driving **sharp rental growth** in this sector across the country." [Our Emphasis]

The extent of the undersupply in the industrial and logistics sector is also set out in the Colliers' Report:

"With supply nowhere near demand levels and **vacancy in the region of 1%**, development in this sector is extremely active..." [Our Emphasis]

This lack of supply is corroborated in Savills' *Dublin Industrial and Logistics Market Report*¹³ for Q1 2022, and in particular the lack of supply of larger units is identified:

"The large units needed by modern occupiers are in increasingly short supply: there are just three units of greater than 50,000 sq ft currently available, two of which are more than 20 years old. An additional eight units in this size range will reach practical completion in 2022, three of which are reserved."

Savills identify a growing need for units of significant scale as ongoing Covid-19 lockdowns in China are set to worsen supply chain bottlenecks in Europe. This has altered businesses supply chains in that prior to the Covid-19 pandemic, a 'just-in-time' inventory management model was commonplace, which has now been replaced by a 'just-in-case' model. The 'just-in-time' model:

"...relies on **keeping inventory to a minimum** by carefully synchronising operations in the manufacturing and distribution process..." [Our Emphasis]

Whereas the 'just-in-case' model:

¹² https://www.colliers.com/en-ie/research/q1-2022-industrial-and-logistics-report

¹³ https://pdf.euro.savills.co.uk/ireland-research/mim-industrial-logistics-q1-2022.pdf



"...keeps a large supply of standing inventory in order to mitigate against supply chain risk."

This change to supply chains has resulted in a trend of businesses increasing their inventory with greater warehouse space required to achieve this. It is our contention that the N7 road corridor is eminently suitable for a warehouse of scale to cater for the emerging market trends in growing demand for warehouses of scale.

CBRE's Dublin Industrial Figures¹⁴ for Q1 2022 portrays the suitability of this area for industrial development:

"The Dublin South West (N7) road corridor once again proved the most dominant location for industrial & logistics activity in the Irish capital during Q1 2022, accounting for 39% of transactions completed in the Dublin market during the first quarter of the year."

This dominance highlights the suitability of this area to accommodate the subject warehouse development.

It is evident from recent research of the Industrial and Logistics Market as outlined above that the trend for continuing demand of industrial floorplates of appropriate scales will continue for the foreseeable future. The development subject to this planning application has the opportunity to contribute a high quality, contemporary warehouse development with ancillary offices and staff facilities on a site located in this area of south-west Dublin that is excellently served by existing road networks, as detailed in the following Section 3.2.

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.

The N82 (Citywest Road) connects the industrial and business campuses in the Citywest area to the N7 (Naas Road) to the west of the subject site, one of the most important transport corridors between Dublin and the south-west. The N82 (Citywest Road) also connects 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 5 No. minutes travel distance of the M50, which provides regional access to the Greater Dublin Area, the Airport and Dublin Port.

The location of the subject lands proximate to junctions of the M50, the N7 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 in a sustainable and efficient manner which can respond to supply chain demand, e-commerce and other factors.

¹⁴ https://www.cbre.ie/en/research-and-reports/Dublin-Industrial-Figures-Q1-2022



It is our professional planning opinion that provision of the proposed warehouse at this strategic location in close proximity to the national road network both responds well to market demands and represents the proper planning and sustainable development of Enterprise and Employment zoned lands.



4.0 PLANNING HISTORY

4.1 Overview of Relevant Planning History of Subject Site

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

4.2 Overview of Relevant Planning History of Nearby Sites in Citywest Business Campus

The South Dublin County Council online search facility details relevant industrial warehouse developments in close proximity to the subject site in addition to residential development in the adjoining site to the north west. The most relevant application sites are identified on the aerial photograph below and are details in the sections following.



Figure 4.1: Aerial Photograph Identifying Relevant Planning Applications in the Immediate Vicinity of the Subject Site (Subject Site Outlined Indicatively in Red)

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



4.2.1 Application for 2 No. Warehouse/ Industrial Units at Brownsbarn

| Reg. Ref | SD21A/0162 |
|----------------------------|--|
| Applicant | Exeter Ireland IV B Limited |
| Address | Brownsbarn, Citywest Campus, Dublin 24 |
| Description of Development | |
| SDCC Decision | Grant Permission |
| Decision Date | 28 th March 2022 |
| Final Grant Date | 12 th May 2022 |

The development of 2 No. warehouses, totaling 14,146 sq m of floor area, on the Objective 'EE' zoned site was deemed consistent with the zoning objective of the site by the Planning Officer in their assessment of the scheme:

"The proposed development is consistent in principle with Zoning Objective 'EE'."

No issue was raised in relation to the height of the two warehouses, however further consideration was requested around the neighbouring Protected Structure.

"While the height and proximity of the unit to the Protected Structure might be acceptable the applicant should ensure that the unit is sensitively designed so as not to detract from the Structure."

The Conservation Architect appointed by the Applicant liaised directly with South Dublin County Council's Architectural Conservation Officer following the *Request for Further Information*. The Council's Architectural Conservation Officer detailed the importance of design in reducing the visual impact of warehouses.



"The use of materials and how different design elements could be adapted to assist with reducing the scale of the new units i.e., finishes, colour, breaking up the elevations and height, set-back etc..."

Changes were made to the scheme following this *Request for Further Information* with the major change relating to the 90-degree rotation of one of the units, to increase the distance from the neighbouring Protected Structure.

The Planning Authority was satisfied with the amendments to the scheme and permission was granted on 28th March 2022 with a Final Grant of Permission issuing on 12th May 2022, subject to 18 No. conditions.

4.2.2 Application for a Warehouse at Baldonnell Business Park

| Reg. Ref | SD20A/0204 |
|----------------------------|--|
| Applicant | Airtraks Ltd T/A ATC Computer Transport & Logistics |
| Address | Baldonnell Business Park, Baldonnell, Dublin 22 |
| 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 2,222 sq m including a warehouse area (1,530 sq m), staff facilities (302 sq m) and ancillary office area (390 sq 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 |
| CDCC Decision | below ground. |
| SDCC Decision | Grant Permission |
| Decision Date | 5 th October 2020 |
| Final Grant Date | 16 th November 2020 |

The Planning Officer, in their assessment of the 15.8 metre high warehouse located on 'EE' zoned lands, considered:

"The principle of the proposed warehouse and associated facilities is acceptable at this location."

With regard to the proximity to Casement Aerodrome, the Planning Officer noted:

"The Department of Defence and the IAA have recommended a condition regarding cranes. The impact on aviation is, therefore, considered acceptable."

The Planning Officer also noted the location of the site within Flood Zone C:



"Flood risk should therefore be considered when determining whether the principle of the proposed development is acceptable. The site is located with Flood Zone C and is therefore sequentially preferable. Given this, a detailed FRA is not required."

Permission was granted on 5th October 2020, with a Final Grant issuing on 16th November 2020, subject to 12 No. conditions.

4.2.3 Application for 4 No. Warehouse/Industrial Units in 3 No. Buildings

| Reg. Ref | SD21A/0150 |
|----------------------------|--|
| Applicant | Rohan Project Management Ltd. |
| Address | Cheeverstown, Tallaght, Dublin 24 |
| Description of Development | Construction of 4 warehouse/industrial units in 3 buildings of c. 13,611 sq m total gross floor area (including ancillary offices and operational facilities) and up to 15m in height, with rear service yards; 155 car parking spaces; 72 cycle parking spaces; water services infrastructure and sustainable urban drainage system features, including relocation and resizing of a pump station permitted under SD15A/0391; internal road network accessed via 2 site entrances established in the previous planning applications on the Eastern and Southern sides of the site, via the roundabout at Citywest Avenue and the R136 outer ring road; amendments to the proposed tree pits along the green-link permitted under SD15A/0391; public lighting, landscaping, planting and boundary treatments throughout the development; all other necessary site and infrastructural works to facilitate the development. |
| SDCC Decision | Grant Permission |
| Decision Date | 7 th October 2021 |
| Final Grant Date | 17 th November 2021 |

The planning application relates to a 10 No. year permission for 4 No. warehouse/ industrial units in 3 No. buildings of c. 13,611 sq m total gross floor area, up to 15 metres in height. The Planning Officer determined the following in relation to the proposed development located on 'EE' zoned lands:

"...subject to compliance with the relevant policies, standards and requirements of the current South Dublin County Council Development Plan 2016-2022, the principle of the proposed infrastructure development is acceptable at this location."

The Planning Officer deemed a 10 No. year permission to not be necessary in this instance and stated that if permission is granted, it should be limited to 5 No. years.

The proposed development was acceptable in principle however a *Request for Further Information* was issued relating to 3 No. items including roads requirements, service and drainage requirements with a request relating to additional SuDS measures and exploring the possibility of a green roof at the site.



It was deemed that the Applicant provided a satisfactory response to the *Request for Further Information*, and permission was granted on 7th October 2021, with a Final Grant of Permission issuing on 17th November 2021, subject to 12 No. conditions.

Phase two of the above planning application was lodged on 16th July 2021 and is set out below.

| Reg. Ref | SD21A/0199 |
|----------------------------|---|
| Applicant | Rohan Project Management Ltd. |
| Address | Cheeverstown, Tallaght, Dublin 24 |
| Description of Development | 10-year planning permission for Phase 2 development (Unit 4); the construction of 1 industrial/warehousing unit of approximately 14,730 sq m gross floor area (including ancillary offices and operational facilities) and up to approximately 17 metres in height, with rear service yard; 155 car parking spaces; 72 cycle parking spaces; water services infrastructure and sustainable urban drainage system features; 2 entrances and internal road network, which will connect to Citywest Avenue and the R136 Outer Ring Road via the internal estate road network proposed under Reg. Ref. SD21A/o150; pedestrian/cycle entrance to the south-east at Citywest Avenue; public lighting; landscaping, planting and boundary treatments throughout the development; external sprinkler tank and pumphouse; and all other necessary site and infrastructural works to facilitate the development on a site generally bound to the east by the R136 Outer Ring Road, to the south by Citywest Avenue and to the west and north by undeveloped lands subject to a Phase 1 industrial/warehousing development planning application (Reg. Ref. SD21A/o150) and having been granted planning application (Reg. Ref. SD21A/o150) and having been granted planning permission for infrastructural and enabling works under Reg. Refs. SD15A/o391 (extended by SD15A/o391/EP) and SD16A/o400, and with the Phase 1 industrial/warehousing development planning application (Reg. Ref. SD21A/o150) currently being assessed by South Dublin County Council. |
| SDCC Decision | Grant Permission |
| Decision Date | 14 th October 2021 |
| Final Grant Date | 24 th November 2021 |

The above proposal relates to a 10 No. year permission for an industrial/warehousing unit of approximately 14,730 sq m gross floor area and up to c. 17 metres in height. The Planning Officer again noted:

"...subject to compliance with the relevant policies, standards and requirements of the current South Dublin County Council Development Plan 2016-2022, the principle of the proposed development is acceptable at this location."

The below figure 4.2 sets out phase one and phase two of the development:





Figure 4.2: Site Plan with Phasing Annotated

Source: Digital Dimensions, annotated by Thornton O'Connor Town Planning, 2022

A 10 No. year permission was not deemed appropriate in this instance and the Planning Officer noted that if permission is granted, it should be limited to 5 No. years.

With regard to visual amenity of the Phase Two development, the Planning Officer notes:

"It is considered the design of the proposed development would integrate well with the character of the area and the context of the site."

Permission was granted on 14th October 2021, with a Final Grant of Permission issuing on 24th November 2021, subject to 14 No. conditions.



4.2.4 Application for a Data Centre in Citywest Business Campus

| Reg. Ref | SD18A/0301 |
|----------------------------|--|
| Applicant | Citywest Ltd. |
| Address | Site at the junction of Kingswood Drive and Kingswood Road within Citywest Business Campus, Naas Road, Dublin 24 |
| Description of Development | Construction of a 2 storey data centre (including associated office space) of 10,622 sq m, associated generators, sprinkler tank and sprinkler pump, and 10kV electricity substation. The proposed development also provides for associated plant at roof level, all associated site development works, landscaping, car parking, and 2 vehicular entrances off Kingswood Drive and Kingswood Road, all on a site area of 1.9ha. |
| SDCC Decision | Grant Permission |
| Decision Date | 18 th December 2018 |
| Final Grant Date | 4 th February 2019 |

The development relates to a data centre located within the Citywest Business Campus on 'EE' zoned lands, with an overall height of 12-15 metres. The Planning Officer noted:

"The proposed development would be generally consistent with the 'Enterprise and Employment' policies and objectives of the County Development Plan 2016-2022."

With regard to the location of the site within the 'approach area 29' of Casement Aerodrome, the Planning Officer notes:

"It is noted from viewing the South Dublin County Council Development Plan maps (2016-2022) that the proposed site is located within 'approach area 29' of Casement Aerodrome at Baldonnel but is not located within the Department of Defence Inner Zone. Section 11.6.6 of the South Dublin County Council Development Plan 2016-2022 provides for a 20 metre height restriction but this is not applicable to this application as its proposed maximum height is 15 metres."

Further information was requested by the Planning Authority in relation to ecology, arboriculture, planting and the provision of a green wall. The Planning Officer was satisfied with the Further Information provided and granted permission on 18th December 2018, with a Final Grant issuing on 4th February 2019, subject to 14 No. conditions.



4.2.5 Refusal and Subsequent Grant of Permission for a Residential Development at an Adjoining Site to the North-West

| Reg. Ref | SD17A/0058 |
|-------------------------------|--|
| Applicant | Citywest Ltd. |
| Address | Site to the south and rear of Old Naas Road, Brownsbarn, Dublin 24 |
| Description of Development | Residential development of 10 dwellings consisting of 7 townhouses, 2 semi-detached houses and 1 detached house, including all associated site development works, car parking, landscaping, open spaces with piped and wired services on a site area of approx. 0.56ha with vehicular access from adjoining land to the Old Naas Road. |
| SDCC Decision | Refuse Permission |
| Decision Date | 27 th September 2017 |

The proposal sought the construction of 10 No. two storey dwelling houses on 'RES' zoned lands. The planning application was refused on the 27th September 2017 due to inadequate drainage proposals, undersized attenuation systems and insufficient details submitted in relation to surface water attenuation system, foul drain layout, watermain layout and invert levels.

Following the refusal issued by South Dublin County Council, a subsequent application was lodged by the Applicant at the same site, which is set out below.

| Reg. Ref | SD18A/0060 |
|------------------|--|
| Applicant | Citywest Ltd. |
| Address | South of the Old Naas Road in the townland of Brownsbarn, Dublin 24. |
| Description of | Residential development consisting of ten 2 storey houses, comprised of |
| Development | two 4 bed semi-detached houses, one 3 bed detached house and seven 3 bed terraced houses, including all associated site development works, car parking, landscaping and open spaces, on a site area of 0.55 ha, with vehicular access from the Old Naas Road via an adjoining permitted development to the west (under Ref. SD13A/0268). |
| SDCC Decision | Grant Permission |
| Decision Date | 1 st August 2018 |
| Final Grant Date | 7 th September 2018 |

The Applicant submitted all relevant details in response to the earlier refusal and permission was granted on 1^{st} August 2018, with Final Grant issuing on 7^{th} of September 2018, subject to 23 No. conditions.

4.3 Planning History Analysis

The planning history of the surrounding area demonstrates that South Dublin County Council have positively considered the development of warehousing and residential uses on surrounding land holdings. The Citywest area provides a strong employment base for South Dublin and with continued growth of the 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 18 metres which slopes down in a 'wave' to create an attractive roof profile. It is noted that warehouses of 17 metres have previously been permitted in the surrounding locale, for example under SDCC Reg. Ref.: SD21A/o199. Similarly, heights in excess of 16 metres were permitted under SDCC Reg. Ref.: SD21A/o162 and as part of this application, an emphasis was placed on the design of the warehouses with specific attention directed towards the breaking up of elevations. This is a design approach that has been emulated as part of the subject scheme.

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 PROPOSED DEVELOPMENT IN DETAIL

5.1 Description of the Proposed Development

Rockface Developments Limited intend to apply for permission for development at this c. 2.56 Ha site at Kingswood Road and Kingswood Avenue, Citywest Business Campus, Dublin 24. The lands are generally bounded to the south-east by Kingswood Avenue, to the south-west by an ancillary car park associated with Citywest Business Campus, to the north-west by Kingswood Business Centre and Ardsolus Residential Development and to the north-east by Kingswood Road.

The development will comprise the provision of a warehouse with ancillary office and staff facilities and associated development. The warehouse will have a maximum height of 18 metres with a gross floor area of 11,691 sq m including a warehouse area (10,604 sq m), ancillary staff facilities (499 sq m) and ancillary office area (588 sq m).

The development will also include: a vehicular and pedestrian entrance to the site from Kingswood Road to the north-east; a separate HGV entrance from Kingswood Avenue to the south-east; 64 No. ancillary car parking spaces; bicycle parking; HGV parking and yard; level access goods doors; dock levellers; access gates; hard and soft landscaping; canopy; lighting; boundary treatments; ESB substation; plant; and all associated site development works above and below ground.

5.2 Summary of the Proposed Development

The proposed development principally seeks to provide 1 No. warehouse which includes:

| Uses | Proposed | |
|----------------------------|-------------|--|
| Warehouse | 10,604 sq m | |
| Ancillary Office | 588 sq m | |
| Ancillary Staff Facilities | 499 sq m | |
| Total: | 11,691 sq m | |

The total area of the warehouse with ancillary offices and staff facilities is proposed to be 11,691 sq m, with a maximum height of 18 metres.

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



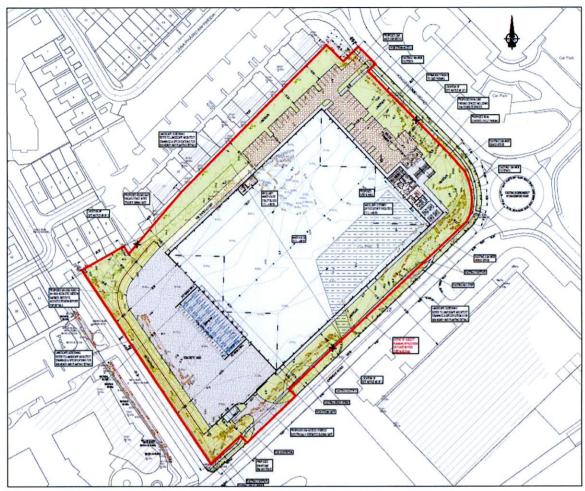


Figure 5.1: Site Plan (Drawing No.: D1736 D2)

Source: Kavanagh Burke Consulting Engineers, 2022

5.3 Key Site Statistics

| Total Site Area: | c. 2.56 Ha |
|-------------------------|---------------|
| Total Gross Floor Area: | 11,691 sq m |
| Site Coverage: | 43.5% |
| Plot Ratio: | 0.46 |
| Car Parking: | 64 No. spaces |



Visualisations of the proposed scheme are provided below:





Figure 5.2 - 5.3:

Visualisations of the Proposed Scheme.

Source:

3D Design Bureau, 2022



5.3 Design Rationale

A *Design Statement* prepared by Kavanagh Burke Consulting Engineers, in conjunction with Enviroguide 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 a single occupancy warehouse building with ancillary offices accompanied by safe and spacious HGV access /egress and docking/marshalling yard plus ancillary carparking separated from the HGV activity. The site is appropriately zoned as Enterprise&Employment-EE zoned lands. The proposed development comprises infill warehousing within a mature business park environment which borders existing office and residential developments to the north-west and the existing warehouses to the south-east."

The *Design Statement* also notes the attempts to respond to the existing context and also minimise the impact of the development on the locale:

"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 (south west) furthest away for the dwellings. Also, between the boundary with the existing dwellings (north west corner) we propose a landscape screen with acoustic barrier adjacent to the dwelling elevations."

Ultimately, the design goal of the scheme is outlined:

"The design goal to provide modern yet practical and appropriate building appearance at this 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 at this major employment node."

5.4 Landscaping

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



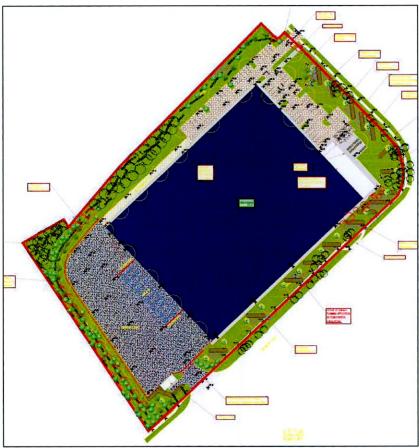


Figure 5.4:

Proposed Landscaping Masterplan

Source:

Enviroguide Consulting

Figure 5.4: Landscape Masterplan & Boundary Conditions

Source: Enviroguide Consulting, 2022

Enviroguide Consulting have provided a *Landscape and Visual Screening Statement* for the proposed site, which concludes:

"Although the proposed warehouse building will be visible from some areas beyond the immediate Citywest Business Campus setting, many of these farming and commercial / industrial areas are not considered to be sensitive to such views. The most sensitive areas with potential visibility are the residential estates to the north - Silken Park and Ardsolus and residential zoning for new residential development to the south. In both instances the proposed building will be seen in the same context and backdropped by the existing business park."

Mitigation measures that have been implemented in the subject scheme include:

"Potential mitigation to reduce visual impacts includes; a dispersed colour scheme to break-up bulk and massing; buffering the northern and western boundaries of the site insofar as possible (possible car parking areas) to reduce perceived scale and massing; and, screen planting / street tree planting to soften and screen the building."



An *Ecological Impact Assessment* has also been prepared by Enviroguide Consulting which concludes:

"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 environment. The scheme has been designed in accordance with acoustic screening requirements with berms strategically placed to protect the amenity of residential properties and the scheme will also ensure the ecological integrity of the subject site will not be negatively impacted.

5.5 Engineering Services

Kavanagh Burke Consulting Engineers have set out the proposed water and wastewater 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 nearby business parks in 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 sewage from the proposed development and discharge to the existing foul sewer manhole and network at Kingswood Road, Citywest Business Campus.



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 discharge for the overall development."

Watermain

"The watermain proposed to serve the development will form a metered connection from the existing main spur at Kingswood Avenue, exact location show non accompanying drg ref. D1736-D4."

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

5.6 Traffic and Transportation

A *Traffic Impact Assessment* has been prepared by Stephen Reid Consulting Traffic and Transportation Limited.

Stephen Reid Consulting Traffic and Transportation Limited outlines 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."

Furthermore, outlining that:

"Therefore, it is submitted that the development as proposed is in accordance with the proper planning and sustainable development of the area."

An *Outline Workplace Travel Plan* has also been prepared by Stephen Reid Consulting Traffic and Transportation Limited and is enclosed with this planning application.

5.7 Noise Assessment

An Acoustic Review for Planning has also been prepared by RSK Ireland Limited which concludes:

"In summary, once consideration is given to the range of mitigation measures outlined in this report, the expected noise impact of the proposed development on nearby receptors is not significant."

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 POLICY

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.

The South Dublin County Council Development Plan 2016 – 2022 ("Development Plan") is the statutory plan for the area and guides development relating to the subject site. Reference will also be made to the Draft South Dublin County Council Development Plan 2022-2028 ("Draft Development Plan") which is due to be adopted in August 2022¹⁵.

6.2 Zoning - Objective 'EE'

The subject site is zoned Objective 'EE' – Enterprise and Employment in the *Development Plan*, where the objective is "to provide for enterprise and employment related uses".

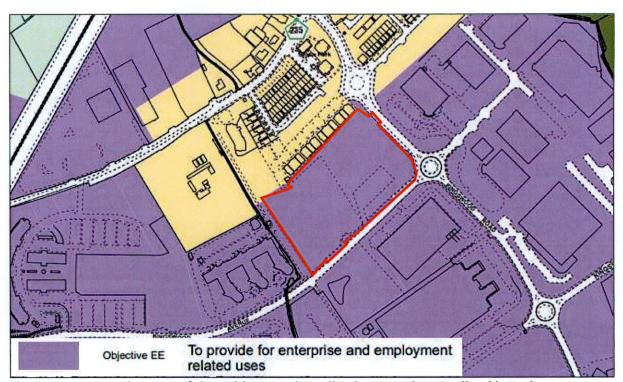


Figure 6.1: Zoning Map of the Subject Lands (Indicative Boundary Outlined in Red)

Source: South Dublin County Council Development Plan 2016-2022, Map No. 4, annotated by Thornton O'Connor Town Planning, 2022

¹⁵ https://www.sdcc.ie/en/devplan2022/



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 zoning also remains unchanged in the *Draft South Dublin County Council Development Plan 2022-2028* ("*Draft Development Plan"*) as shown in Figure 6.2 below:

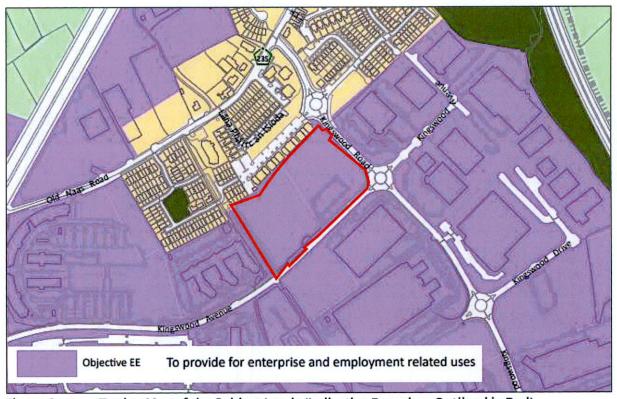


Figure 6.2: Zoning Map of the Subject Lands (Indicative Boundary Outlined in Red)

Source: Draft South Dublin County Council Development Plan 2022-2028, annotated by Thornton O'Connor Town Planning, 2022

The provision of a warehouse with ancillary office space and staff facilities at the subject site 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 | "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." |
| ET ₃ Objective ₃ | "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." |
| ET3 Objective 5 | "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." |
| ET ₃ Objective 6 | "To ensure that business parks and industrial areas are designed to promote walking, cycling and public transport." |
| TN ₃ Objective 1 | "To provide for a pedestrian bridge over the N7 at the Barney's Lane junction to improve access to the Saggart Luas terminus." |

The proposed scheme is in accordance with the relevant policies of the *Development Plan* outlined above. The proposal will facilitate the continued growth and success of industrial and logistics activity in this area of Dublin. The design of the proposed warehouse is of high-quality architectural merit which has been designed using ubiquitous materials and the development aims to provide 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: |
|------------------------------|--|
| EDE5 Objective 1 | "To prioritise hi-tech manufacturing, research and development and associated uses in the established Business and Technology clusters to the west of the County (Grange Castle and Citywest areas) maximising the value of higher order infrastructure and services that are required to support large scale strategic investment." |
| EDE5 Objective 2 | "To support the phased expansion of the established Business and Technology Clusters to accommodate strategic hi-tech manufacturing investments, research and development and associated uses." |
| Table 13.23 | "The design and layout of new business parks shall promote walking, cycling and the use of public transport, including adequate provision of cycle and pedestrian linkages." |
| QDP12 Objective 3 | "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." |
| QDP12 Objective 4 | "To promote appropriate development that enhances the character and vitality of the existing settlements and which does not negatively impact on existing residential amenity." |
| SM7 Objective 9 | "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: - Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species; - Provision of not more than two parallel or five perpendicular spaces between trees/planting bays; - Use of permeable paving, where appropriate." |
| EDE1 Objective 6 | "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: - An increase in employment densities within walkable distances of communities and on public transport routes; - Promotion of walking and cycling and use of public transport through increased permeability and mobility management measures within and outside employment areas; - The sourcing of power from district heating and renewables including wind and solar. - 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 |
| EDE ₅ Objective 6 | network of the County and promote quality placemaking." "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. " | |
|-----------------------------------|---|--|
| EDE ₅ SLO ₁ | "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." | |

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 the Citywest Business Campus, and the proposal has been designed to a high-quality best practice standard.

6.5 Building Height Under the South Dublin County Development Plan 2016-2022

Table 11.18 of the *Development Plan* 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 18 metres sloping downwards with a 'wave' design. As noted in Section 4.3 of this Planning Report, warehousing developments of a similar scale have been permitted in the vicinity including SD21A/0199, where heights of up to 17 metres were permitted by South Dublin County Council.

Also of note is the provision of a 3 metre high acoustic screen located on top of the 2 metre high bund, which is provided along the south-western/north-western boundary to ensure that the existing residential development to the north-west is not adversely affected by the proposed development. Furthermore, trees and undulating berms are proposed along site boundaries to screen car parking areas and reduce the potential for visual impact, helping to assimilate the development into its surrounding context.

With regard to the height of the warehouse and proximity of Casement Aerodrome, a Aeronautical Assessment Report prepared by O'Dwyer & Jones Design Partnership (Aviation



Planning Consultants) and is enclosed with this planning application. A comprehensive assessment of the height of the warehouse concludes:

"At its nearest the sloping Take-off Climb Surface lies 12m+ above the proposed development's northern corner, and at its nearest the sloping Approach Surface lies 14m+ above the development's highest elements (its parapets rising to 116.35m OD), and both of these surfaces are unaffected by the development."

"Casement Aerodrome's Inner Horizontal Surface lies at 131.6m OD above all of the Kingswood site, which is 15m+ above the highest points of the proposed warehouse development on this site, and is unaffected by it."

Ultimately, the Aeronautical Assessment concludes that the "proposed warehouse development at the Kingswood site complies fully with all aviation and aeronautical requirements which affect the site."

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, which remains unchanged as part of the Draft South Dublin County Development Plan 2022 – 2028, and includes 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 seperately enclosed *Traffic Impact Assessment* prepared by Stephen Reid Consulting Traffic and Transportation Limited. It details that based on the maximum standards set out above, the proposed development generates a maximum of 117 No. spaces if applying the warehouse standard to the overall 11,691 sq m GFA, or a maximum of 118 No. spaces if applying the separate standards to the warehouse floor area (10,604 sq m = 106 No. spaces) and office floor area (588 sq m = 12 No. spaces) only (i.e. excluding staff wellfare/ancillary space).

It is proposed to provide 64 No. car parking spaces, including 3 No. accessible spaces and 2 No. electric vehicle parking spaces. This is considered to be an acceptable provision in the interests of sustainable development and adequately provides for the applicant's car parking requirements.

6.6.2 Cycle Parking

The scheme requires a minimum of 59 No. cycle parking spaces as set out in Section 3.4 of the *Traffic Impact Assessment* prepared by Stephen Reid Consulting Traffic and Transportation Limited (1 space per 200 sq m GFA). It is proposed to provide 60 No. covered cycle parking spaces



as part of the scheme which meets the *Development Plan* standards. This cycle parking standard will remain unchanged as part of the *Draft South Dublin County Development Plan* 2022 – 2028.

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 which equates to an additional 320,000 or a total workforce of 1.34 million people.

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

NPO 10

"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."

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, as demonstrated throughout this report. 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 *NPF*.



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 subject site. Therefore, it is considered that the subject development represents the proper planning and sustainable development of the area. The scheme is therefore fully in accordance with the 'EE' zoning objective 'to provide for enterprise and employment related uses'.

The proposed development is a direct response to the market demand for warehousing of sufficient size to accommodate the requirements of large-scale modern storage and logistics operators. 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, 2001-2022.

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 27th June 2022 which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations*, 2001-2022.
- One copy of the Site Notice dated 27th June 2022 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations*, 2001-2022.

7.3 Planning Application Form

 A completed South Dublin County Council Planning Application Form, dated 27th June 2022.

7.4 Planning Report

• Six copies of this "Planning Report", prepared by Thornton O'Connor Town Planning, dated 27th June 2022.

7.5 Appropriate Assessment by Enviroguide Consulting

• Six copies of the "Appropriate Assessment Screening Report" carried out by Enviroguide Consulting dated June 2022.



7.6 Flood Risk Assessment by Enviroguide Consulting

• Six copies of the "Flood Risk Assessment Report" conducted by Enviroguide Consulting, dated June 2022.

7.7 Ecological Impact Assessment by Enviroguide Consulting

 Six copies of the "Ecological Impact Assessment Report" prepared by Enviroguide Consulting, dated June 2022.

7.8 Tree Assessment Report and Drawings by Enviroguide Consulting

• Six copies of the "Tree Report and Survey" prepared by Enviroguide Consulting, dated June 2022.

7.9 Landscape Drawings by Enviroguide Consulting

• Six copies of the following drawings:

| Enviroguide Consulting | | |
|------------------------|--|----------|
| Drawing No. | Drawing Title | Scale |
| P-01 | Landscape Masterplan & Boundary Conditions | 1:500 |
| P-02 | Typical Landscape Sections | As Shown |
| P-03 | Planting Details | As Shown |
| P-04 | Tree Constraints Plan & Protection Plan | 1:500 |

7.10 Noise Assessment Report by RSK Ireland Limited

• Six copies of the "Acoustic Review for Planning" prepared by RSK Ireland Limited, dated June 2022.

7.11 Traffic Reports Prepared by Stephen Reid Consulting Traffic and Transportation Limited

- Six copies of the report entitled "Traffic Impact Assessment" prepared by Stephen Reid Consulting Traffic and Transportation Limited, dated June 2022; and
- Six copies of the report entitled "Outline Workplace Travel Plan" prepared by Stephen Reid Consulting Traffic and Transportation Limited, dated June 2022.



7.12 Lighting and Sustainability Report by Axiseng Consulting Engineers

- Six copies of the "Part L Compliance Report", dated June 2022; and
- Six copies of the following drawings:

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

7.13 Daylight Sunlight and Overshadowing Assessment by BPC Engineers

 Six copies of the "Daylight, Sunlight and Overshadowing Assessment" prepared by BPC Engineers, dated June 2022.

7.14 Design Statement by Kavanagh Burke Consulting Engineers

 Six copies of the "Design Statement" prepared by Kavanagh Burke Consulting Engineers, dated June 2022

7.15 Aeronautical Assessment Report by O'Dwyer & Jones Design Partnership (Aviation Planning Consultants)

• Six copies of the "Aeronautical Assessment Report" prepared by O'Dwyer & Jones Design Partnership (Aviation Planning Consultants) dated 21st June 2022.

7.16 Drainage Deign Report by Kavanagh Burke Consulting Engineers

• Six copies of the "Drainage Design Report" prepared by Kavanagh Burke Consulting Engineers, dated 17th June 2022.

7.17 Verified Views by 3D Design Bureau

• Six copies of the "Verified Views" document, dated June 2022.

7.18 Drawings by Kavanagh Burke Consulting Engineers

• Six copies of the following drawings are enclosed with this Application:



| Kavanagh Burke Consulting Engineers | | |
|-------------------------------------|--|--------|
| Drawing No. | Drawing Title | Scale |
| D1736 D1 | Site Location Map | 1:1000 |
| D1736 D2 | Site Plan | 1:500 |
| D1736 D3 | Drainage & Watermain Layout | 1:500 |
| D1736 – ESB- 01 | ESB Substation Floor Plan, Section AA & Elevations | 1:50 |
| D1736 GA-A01 | Ground Floor Plan | 1:200 |
| D1736 GA-A02 | First Floor Plan | 1:200 |
| D1736 GA-A03 | Second Floor Plan | 1:200 |
| D1736 GA-A04 | Ancillary Offices & Staff Facilities Block | 1:100 |
| D1736 GA-A05 | Section | 1:200 |
| D1736 GA-A06 | Elevations | 1:200 |
| D1736 GA-A07 | Contiguous Elevations | 1:250 |
| D1736 GA-A08 | Covered Bike Parking | 1:50 |



8.0 CONCLUSION

The proposed development represents a significant investment providing a warehouse with ancillary offices and staff facilities on appropriately zoned lands.

The proposed development is fully in accordance with the zoning objective pertaining to the subject site 'to provide for enterprise and employment related uses' and is in accordance with the policies of the South Dublin County Development Plan 2016 – 2022. It is contended, therefore, that the proposed development adheres to the key principles of the proper planning and sustainable development of the area.

The proposed warehouse is of sufficient size and scale to accommodate the market demand for appropriately sized warehousing that can facilitate the modern operational capacity of the logistics and storage sector.

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:

Andelbh & Conner

Sadhbh O'Connor

Director

Thornton O'Connor Town Planning