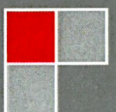


2022

# Proposed Warehouse Development at Lands to the south of Lucan Road, Ballydowd and abutting Hermitage Gardens, Lucan, Co Dublin

## Planning Report

Planning Report to accompany Planning Application lodged on behalf of Jogor Point Ltd. with South Dublin County Council for a development at lands south of the Lucan Road, Ballydowd and abutting Hermitage Gardens, Ballydowd, Lucan, Co. Dublin



## Introduction

This planning report has been prepared to accompany a planning application by Jogor Point Ltd., seeking permission for the construction of a warehouse at lands south of the Lucan Road, Ballydowd and abutting Hermitage Gardens, Ballydowd, Lucan, Co. Dublin

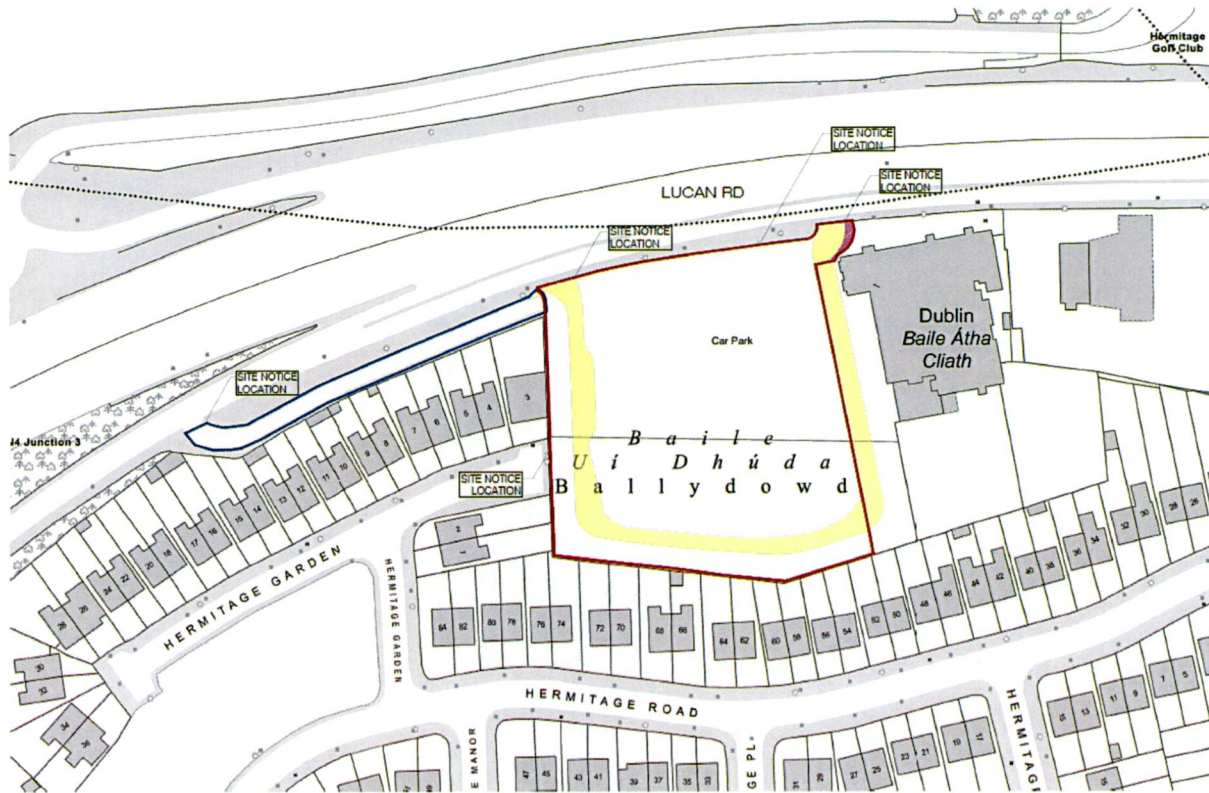


Figure 1: Site Location Map

The planning application, to which this report pertains, seeks to construct on this site a warehouse building for logistics and distribution. Portion of the site is presently used for car parking for the Foxhunter Public House while the remainder is waste ground on which permission was previously granted for residential development.

The adjacent Foxhunter Public House use will remain unchanged. There will continue to be a car parking area at surface level to serve the pub, now located at the rear of the pub. The existing vehicular/cycle entrance to The Foxhunter Pub will be widened, and a new vehicular/cycle exit will be formed to the north west corner of the site.

A small portion of the redlined area is in the ownership of the adjoining owner, Fox Connect Ltd, which has consented to this submission of this application. This is necessary in order to facilitate the very slight widening of the shared site entrance.

## Site Context

The site of this application is located within the established suburban area of Lucan, c. 2km east of the centre of Lucan village and c. 2km west of Liffey Valley town centre. The site is approximately 10km west of Dublin City centre.

The overall site contains the Foxhunter pub, a substantial surface car park with access to/from the N4 carriageway (westbound) and undeveloped green land to the rear. The site is bounded by the N4, golf courses and vast open green lands zoned to protect the amenity of the Liffey Valley to the north, a Texaco petrol filling service station to the east and Hermitage Park residential estate, characterised by two storey semi-detached units, to the south and west of the site. To the west of the development, the site abuts the termination of a cul-de-sac, Hermitage Garden, part of the overall Hermitage Park housing development.



Figure 2: Aerial photo of the surrounding area with an indicative outline of the subject site in red.

The site currently has a number of individual trees which consist of *Betula*, *Fagus* and *Chamaecyparis* trees and are proposed to be removed to facilitate the development.

A single line of *Cuprocyparis × leylandii* trees runs the length of the western and southern boundary which forms a screen to neighbouring properties. These trees shall be retained. The proposed pedestrian entrance at the western boundary may result in some felling to provide this.

The two major centres of Liffey Valley and Lucan Village are less than 10 minutes cycle of the subject site. The accessibility of these centres is a positive for any development at this location.

## Planning History and Background

Planning permission for high density residential development on the site was sought in October 2020 (Reg. Ref. SD20A/0259) with access through the adjoining

residential estate. Permission was refused by South County Council and An Board Pleanala upheld the decision to refuse permission following first party appeal (ABP Ref. 309196-21) on 22<sup>nd</sup> February 2022.

Part of the reasoning for the refusal was that the site was zoned to provide for a retail warehouse development. The applicants made a submission to the recent review of the county development plan pointing out the unsuitability of this site for a retail warehouse development. The planning authority did not agree with the submission and continue to zone the site for retail warehousing.

Given the constraints of the location of this site on the N4 national primary road, the applicant's assessment of the options available to this site, it is considered that retail warehousing a) with its commercial traffic, b) considerable residential customer traffic, would be considered by the relevant regularity authorities to create problems on the adjoining national primary road, and c) a retail warehouse use in proximity to the major retail centre of Liffey Valley could have potential negative impacts on the shopping centre by attracting visitors away. Accordingly, the applicants have decided to apply for a distribution warehouse, which is permissible under the zoning, and is judged to have a significantly less intensive traffic and retail impact and so should be acceptable.

## Policy Context

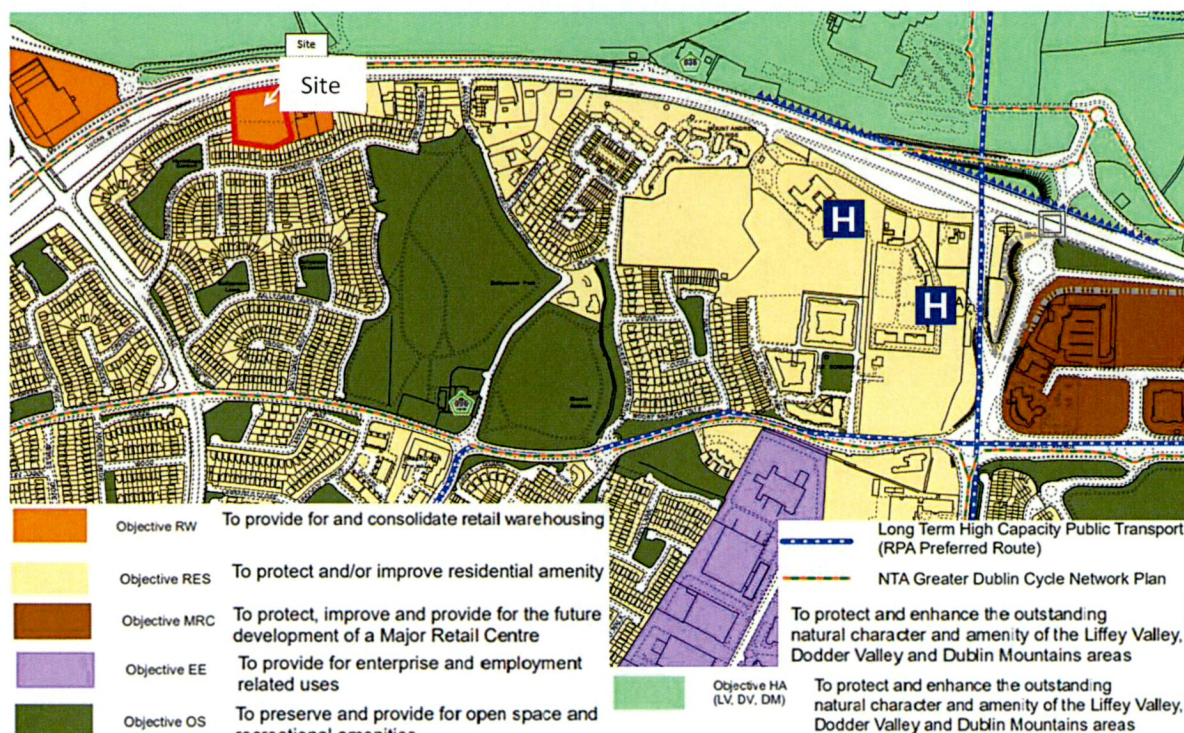


Figure 3: Zoning Plan from South Dublin County Development Plan 2016-2022 identifying the sites zoning objective. Annotated by Manahan Planners, May 2022

The SDCC Development Plan, adopted in August 2022, allocated a zoning Objective RW, “to provide for Retail Warehouse use” to this site. The proposed distribution warehouse is a permissible use under the zoning objective in both plans.

The South Dublin City Development Plan Designated Lucan as an ‘Existing Urban Centre within Dublin City and Suburbs’. See below.

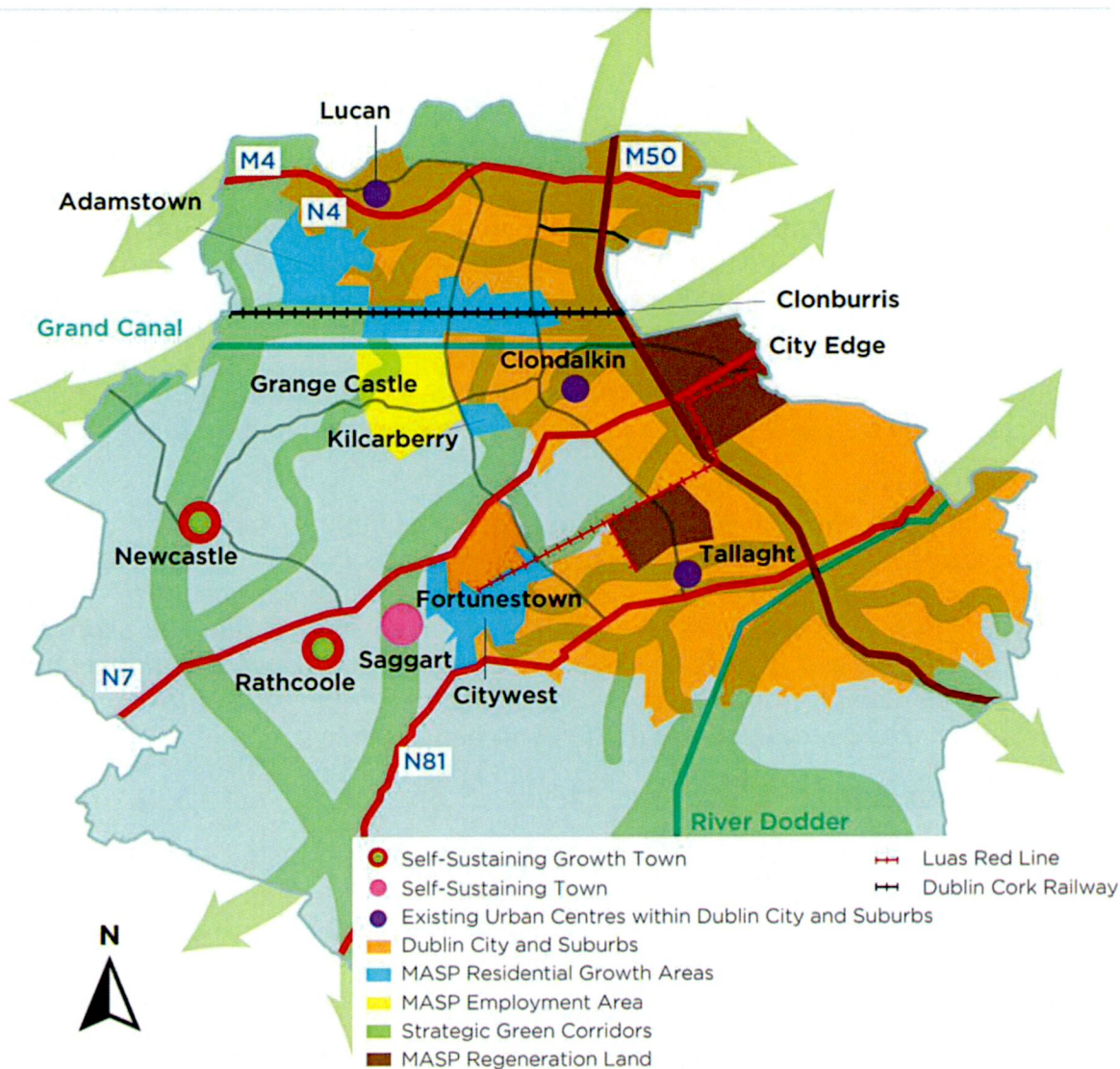


Figure 4: Core Strategy Map. South Dublin County Development Plan 2022-2028

The South Dublin County Development Plan 2022-2028 give the following description of Lucan:

*“Lucan is situated 14 kilometres to the west of Dublin City along the N4 economic corridor. It is characterised by an historic village core surrounded by generally low density suburban neighbourhoods based around a polycentric network of local retail centres and a level 3 district centre. The area is served by high frequency bus routes to Dublin City. The Dublin – Kildare rail line serves communities, including Adamstown, to the south of Lucan. Employment is provided for locally through mixed use retail and commercial areas adjacent to the village core. Grange Castle and other business parks provide employment to the south. The GDA Transport Strategy proposes a Luas line to Lucan from Dublin City and upgrading of the Kildare line as far as Hazelhatch involving electrification and high-frequency commuter services.”*

## **Planning History**

There are a number of previous planning applications submitted on the subject site.

### **Reg. Ref. SDo3A/0171**

An application for 16 No. apartments in two separate two/three storey blocks and 5 no. duplex apartments in a separate two storey blocks was lodged with South Dublin County Council in March 2003. Permission was granted for the development in September 2003.

The application was subject to first and third party appeals to An Bord Pleanala. The Board subsequently refused permission for the development citing the following reason:

*“the vehicular access to the proposed development by means of the termination of a cul-de-sac within the Hermitage Park housing estate and the location of the access road and parking area on site adjacent to the site boundary directly behind existing houses, it is considered that the proposed development would seriously injure the amenities of property in the vicinity and, in particular, those of the houses on the adjoining sites, through noise, traffic generation and general disturbance.”*

### **Reg. Ref. SD04A/0701**

An application for 16 No. apartments in two separate two/three storey blocks and 5 no. duplex apartments in a separate two storey blocks with access via the N4 carriageway through the Foxhunter Pub carpark was lodged with South Dublin County Council in September 2004. Permission was refused for the development in November 2004. The reasons for refusal are as follows:

- 1. “The proposed development would endanger public safety by reason of a traffic hazard or obstruction of road users or otherwise, due to the intensification and generation of traffic turning movements at the median break on the N4 in order to access the development from the west.*
- 2. The intensification of use of an access onto the slip road of the N4 would be in conflict with NRA Policy as set out in their letter of 25/07/94*
- 3. The proposed development would be in conflict with the following policies of the Planning Authority Paragraph 2.6.12, 2.6.12 (i) of the South Dublin County Development Plan 1998, and would therefore be contrary to the proper planning and sustainable development of the area,*
- 4. Due to the location of the access road and parking area on site adjacent to the site boundary directly behind the existing houses, it is considered that the proposed development would seriously affect the amenities of property in the vicinity and, in particular, those of the houses on the adjoining sites, through noise, traffic generation and general disturbance. The proposed development would therefore seriously injure the amenities of the area and of property in the vicinity and be contrary to the proper planning and sustainable development of the area.*

### **Reg. Ref. SD05A/0409**

An application for a residential development of 14 no. dwelling units arranged in 2 no. blocks comprising of 2 no. 2 bed town houses (2 storey) and 3 no. 3 bed town houses (2 storey - all with balconies) and 1 no. 4 bed terrace house, as well as 6 no. 4 bed semi-detached houses and 2 no. 5 bed semi-detached houses (all 2 storey). Access to the scheme will be via Hermitage Garden and Hermitage Park. Permission for the development was granted in October 2005.

The application was subject to a third party appeal to An Bord Pleanála. The Board decided to grant permission with a number of conditions which are mostly standard. Condition No. 6 states the following:

*“All construction traffic shall access/egress the site via the car park of the Foxhunter Public House, and the cul-de-sac at Hermitage Garden shall not be opened up for pedestrian and vehicular access until the development is otherwise completed.”*

The permitted development never commenced and the site remains undeveloped.

### **Reg. Ref. SD20A/0259 (ABP Ref. 309196-21)**

Most recently a permission for high density residential development on the site was sought in October 2020 (Reg. Ref. SD20A/0259). The proposal was for the following:

*“a) The formation of a new vehicular, cycle and pedestrian entrance off Hermitage Gardens and between Nos 2 + 3 to the west of the site; b) the construction of a semi-basement car park for 97 cars, bin and bicycle storage with two-way access ramp; c) the construction of a 1.2m high (approximately) raised podium over the car park area; d) a four-storey above podium apartment block containing 15 no. apartments; e) a three-storey apartment block containing 21 no. apartments and a 15 sqm Substation at ground floor; f) a three-storey apartment block containing 21 no. apartments; g) a twenty storey apartment building (65m high) (above podium) containing 104 no. apartments, entrance lobby, communal facilities including work stations, meeting rooms, laundry and office and external podium level terrace; h) 328 bicycle parking places dispersed throughout, underground rainwater retention tanks; hard and soft landscaping, including planted communal gardens and play areas. Pedestrian and cycle access/egress only will be retained off the N4. The mix of the apartments will be as follows 37 studio apartments, 42 1 bed apartments, 8 2-bedroom (3 person) apartments, 70 2-bedroom(4 person) apartments, 4 3-bed apartments. The total number of apartments proposed is 161.”*

This application for development was refused permission by South County Council and An Bord Pleanála upheld the decision to refuse permission following first party appeal (ABP Ref. 309196-21) on 22nd February 2022.

## The Proposed Development

The Statutory Notices read as follows:

**SOUTH DUBLIN COUNTY COUNCIL** *Jogor Point Ltd, applies for Planning Permission at Lands to the south side of Lucan Road, Ballydowd, [and abutting Hermitage Gardens], Lucan, Co Dublin . The development will consist of: The construction of a) a metal clad single-storey warehouse, of 3072 sqm, 13.58m high to parapet at front and part of the sides, and 10.4m high to eaves and 12.9m high to the ridge at part of sides and rear; b) a single storey 2.9m high ESB substation of 14sqm ; c) the widening of the existing vehicular/cycle entrance to The Foxhunter Public House , and the forming of a new vehicular/cycle exit to the north west corner of the site; d) the formation of pedestrian/cycle gate to Hermitage Gardens and pedestrian gate to Lucan Road, e) internal roads and pathways and all associated hard and soft landscaping, f) foul and surface drainage, including attenuation tanks; g) 18 no. carparking spaces and 16 no. bicycle spaces.*

The proposed development consists of the construction of a single storey warehouse unit, 13.58 metres tall and total floor area of 3,072 sq.m. 18 no. car parking spaces are to be located along the south and southwest elevations of the warehouse. 16 no. covered bicycle spaces are located along the west and southwest elevation. See image below.

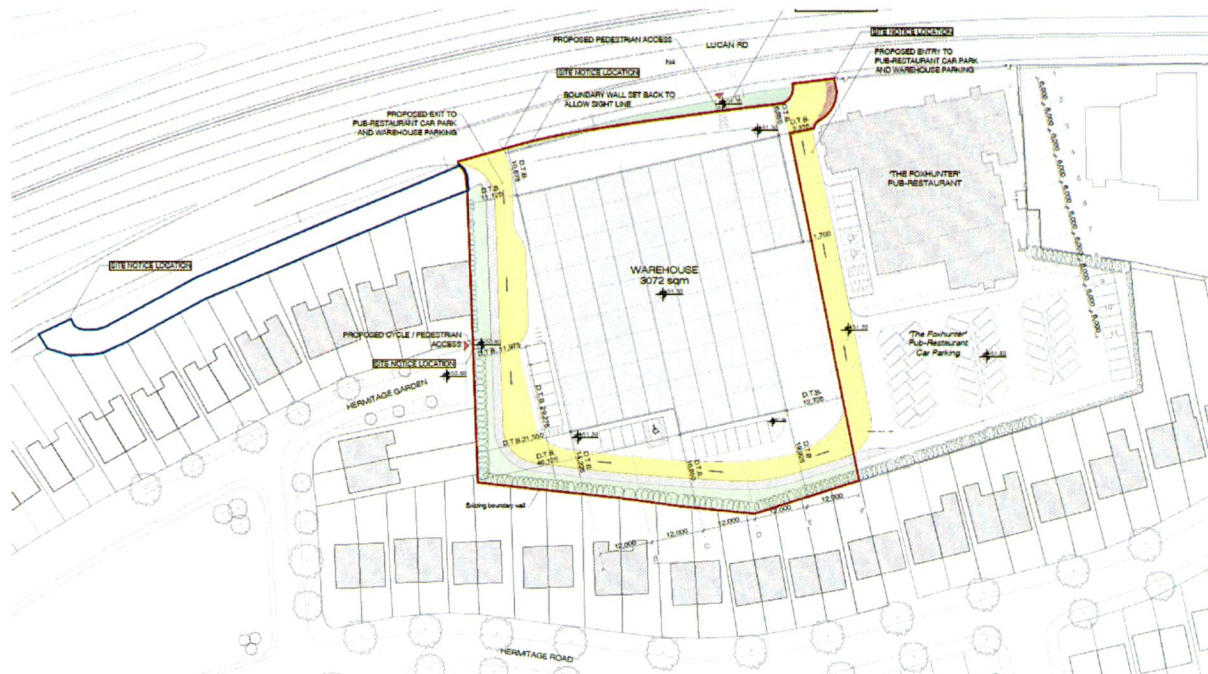


Figure 5: Site Layout Plan

The proposal also allows for a pedestrian only gate at the boundary with Hermitage Gardens to allow permeability for the residents of the estate to and from the Foxhunter public house. Residents will be able to walk along the circulation road (in yellow). This arrangement is not unlike in supermarkets where shoppers and service trucks traverse the same area, albeit the trucks generally do so at night.



# Planning Assessment

## South Dublin County Development Plan 2022-2028

The subject site is zoned in the current Development Plan as 'Objective RW' which seeks "to provide for and consolidate retail warehousing."

**RETAIL (R) Policy EDE15: Retail Warehousing:** Consolidate existing retail warehousing clusters and direct new retail warehousing floor space in the County into the Major Retail Centre (MRC) and Retail Warehousing (RW) zones.

**EDE15 Objective 1:** To direct Retail Warehousing into lands designated with Major Retail Centre 'MRC' Zoning Objective and Retail Warehousing 'RW' Zoning Objective and to limit new retail warehousing / retail park floor space outside of these areas.

**EDE15 Objective 2:** To ensure that retail warehousing development would not adversely impact on the vitality and viability of established retail centres and retail warehousing cores in the County, in accordance with the Retail Planning Guidelines for Planning Authorities (2012) or any superseding guidelines.

**EDE15 Objective 3:** To ensure that retail warehousing development would not adversely impact on the vitality and viability of existing Town and Village Centres throughout the County

It is considered that the construction of a retail warehouse on this site would be an unsuitable development for the site specific reasons below, notwithstanding the zoning objective.

- A retail warehouse requires to be a certain minimum size in order to function correctly, to carry a sufficient range of goods both within the building and externally in a garden centre, and to provide sufficient on-site parking for customers and loading facilities. This site is too small to satisfactorily accommodate such a development.
- Such a facility would generate an amount of customer traffic onto the National primary road, the N4, which is likely to be unacceptable to the regulatory authorities.

In view of these considerations, it was decided the only viable alternative for this site is to provide for a logistical warehouse accessed from the N4. The proposed warehouse would have a positive role in supporting the intended growth of Liffey Valley shopping center.

The construction of a warehouse at this site is consistent with the Retail Warehousing policies and objectives set out in the South Dublin County Development Plan.

## **Car& bicycle parking**

The proposed development is located close to the urban and employment centres Lucan and Liffey Valley Shopping Centre as well as being adjacent to frequent public transport.

A total of 20 no. car parking spaces and 16 no. covered bicycle parking spaces are proposed throughout the site.

South Dublin County Development Plan sets out car and bicycle parking standards as follows:

**Maximum car parking** – (zone 1) 1 space per 100 sq.m of warehouse GFA. Therefore the maximum allowable car parking spaces are 31 no. spaces. The proposed development will provide 18 no. car parking spaces.

**Minimum bicycle parking spaces** – 1 space per 200 sq.m of warehouse GFA. This results in a minimum of 16 no. bicycle spaces, which is proposed to be provided.

## **Traffic Assessment and Mobility Management**

There will be no vehicular access off Hermitage Gardens, only pedestrian and cycle access. The site entrance and exit will be shared with the operators of the adjoining public house. Vehicular traffic will be routed around the east, south and west sides of the warehouse, exiting the site at its north-west corner.

This application is accompanied a Transportation Assessment Report from NRB Traffic Consultants. The report assesses the traffic and transportation impact of the proposal. The conclusions of the report are given below:

*“The assessment confirms that the operation of the proposed development and the established existing traffic combined will have an unnoticeable impact upon the operation of the adjacent road network.*

*The work included a redesign of the access arrangement together with a statutory independent stage 1 Road Safety Audit (& the associated designer feedback form) of same, which is included herein as Appendix F. (Of the Transportation Assessment).*

*Based on our studies and the assessments undertaken, we conclude that there are no traffic capacity or operational issues associated with the proposed development that would prevent planning permission being granted by South Dublin County Council”*

## **Drainage Report & Flood Risk Assessment**

A Drainage Report was prepared by JJ Campbell. This sets out the technical data for the existing and proposed surface water, foul effluent networks and SUDS spreadsheet for the proposed development.

See drawings from JJ Campbell which accompany this planning application, identifying the layout and location of drainage and attenuation infrastructure.

The Flood Risk Assessment, carried out by JJ Campbell is contained within Appendix 4 of the Drainage Report. The FRA concludes:

*“the site has been shown to be in Flood Zone C and is at a low risk of inundation from fluvial sources. No historic flooding was identified at the site or but there has been in the surrounding area. Review of the CFRAM flood map confirm that the site is not at risk of inundation from the 1% AEP & 0.1% AEP events (fluvial or pluvial).*

*The development will include a stormwater system that will manage surface water within the site boundary. This will contain attenuation tanks and discharge surface water from the site at its greenfield equivalent. The stormwater will also minimise the risk of pluvial flooding to the development.*

*To further minimise the risk of pluvial flooding it is recommended that the FFL be set a minimum of 150mm above the external hardstanding area.”*

## **Conclusion**

The proposed warehouse development is a permitted use within a Retail Warehouse zoned site, and hence its use is consistent with the provisions of the County Development Plan.

The proposed development will provide an appropriate use and enhanced permeability through the site which will contribute positively to the surrounding area. Having regard to the site specific constraints of this site, it is submitted that the current proposal is consistent with the proper planning and sustainable development of the area.

It is requested that the South Dublin County Council proceed to grant permission for this development.

We look forward to a Decision in due course.

**Manahan Planners**

**4<sup>th</sup> October 2022**

