



THORNTON O'CONNOR  
TOWN PLANNING

# PLANNING REPORT

## Planning Report

In respect of the Development of a Warehouse Unit with  
Ancillary Office Space

At a c. 0.297 Ha site at JFK Environmental Limited, John  
F Kennedy Road, John F Kennedy Industrial Estate,  
Dublin 12, D12 CF34

Submitted on Behalf of JFK Environmental Limited

September 2022







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

Thursday, 22<sup>nd</sup> September 2022

Dear Sir/ Madam

**Re: APPLICATION FOR PERMISSION FOR THE PROVISION OF A REPLACEMENT WAREHOUSE AT A C. 0.297 HA SITE AT JFK ENVIRONMENTAL LIMITED, JOHN F KENNEDY ROAD, JOHN F KENNEDY INDUSTRIAL ESTATE, DUBLIN 12, D12 CF34**

## **1.0 INTRODUCTION**

### **1.1 Application for Development**

JFK Environmental Limited<sup>1</sup> has retained Thornton O'Connor Town Planning<sup>2</sup> in association with ODA Architecture<sup>3</sup> and Enviroguide Consulting<sup>4</sup>, to prepare this application for permission for development principally comprising the demolition of an existing warehouse and ancillary office space and provision of a new warehouse with ancillary office space on a c. 0.297 Ha site at JFK Environmental Limited, John F Kennedy Road, John F Kennedy Industrial Estate, Dublin 12, D12 CF34.

### **1.2 Description of the Proposed Development**

JFK Environmental Limited intend to apply for permission for development at this c. 0.297 Ha. site at JFK Environmental Limited, John F Kennedy Road, John F Kennedy Industrial Estate, Dublin 12, D12 CF34, which operates as an EPA licensed facility.

The development will comprise the demolition of the existing warehouse and ancillary office space (c. 459 sq m) and 2 No. curtain sided storage racks (c. 46 sq m), and the provision of a new warehouse with ancillary office space (c. 746 sq m) and associated development. The proposed warehouse will have a maximum height of c. 11.15 metres.

The development will also include: the minor repositioning of an internal gate; the rearrangement of car parking spaces comprising a reduction from 10 No. to 7 No. car parking spaces (including the provision of an accessible parking space); bicycle parking; the provision of

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<sup>1</sup> JFK Road, JFK Industrial Estate, Dublin 12

<sup>2</sup> 1 Kilmacud Rd Upper, Dundrum, Dublin 14, D14 EA89

<sup>3</sup> Marlborough Mews, Marlborough Lane, Donnybrook, Dublin 4

<sup>4</sup> 3D Core C, Block 71, The Plaza Park West, Dublin, D12 F9TN







a sectional door on the north-east elevation; external signage; rooflights; lighting; boundary treatments; 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 6.0;
- 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 *Appropriate Assessment Screening Report* enclosed separately. The Report concludes:

*"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)  
South Dublin Bay SAC (000210)  
Rye Water Valley/Carton SAC (001398)  
Wicklow Mountains SAC (002122)  
North Dublin Bay SAC (000206)  
South Dublin Bay and River Tolka Estuary SPA (004024)  
Wicklow Mountains SPA (004040)  
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.*

*On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required."*





## 2.0 SITE LOCATION, CONTEXT, DESCRIPTION AND ACCESSIBILITY

### 2.1 Site Location

The industrial site, which has an area of c 0.297 Ha, is located in an Industrial Estate. The site is generally bounded to the south by John F Kennedy Road and is located beside similar warehouse type buildings. The M50 is the main arterial route close to the development which is located to the west of the subject site. Please see Figure 2.1 below for the location of the subject site within JFK Industrial Estate.

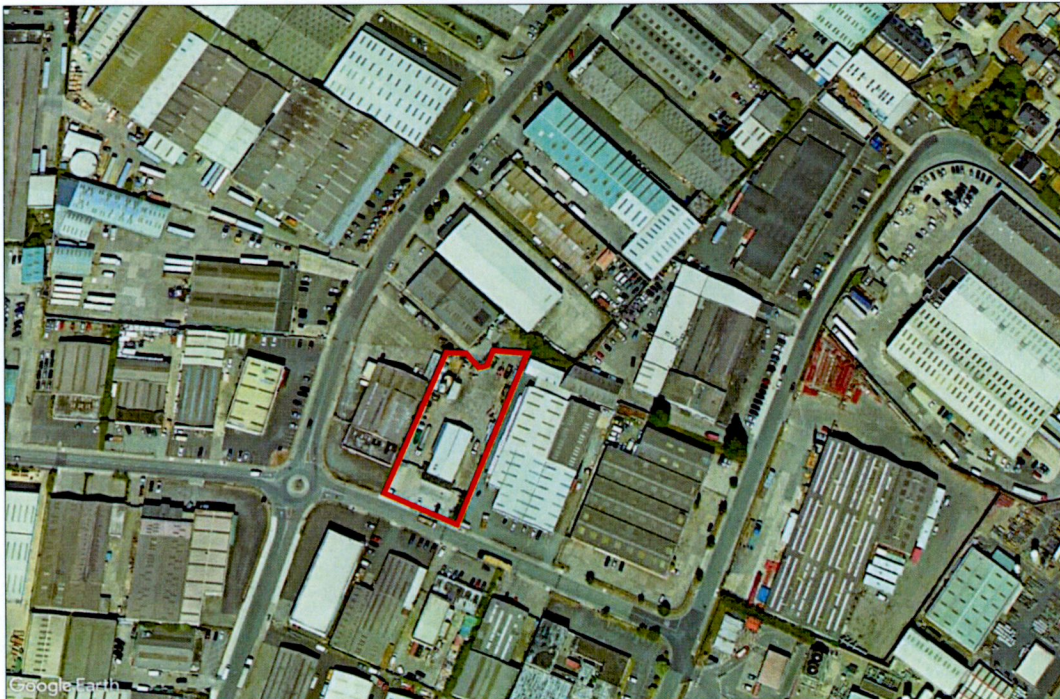


Figure 2.1: Map Showing the Location of Subject Site as Shown in Red (Indicative Only)

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

### 2.2 Site Context

The surrounding site is industrial and commercial in nature. With regard to the industrial context, the subject site is located within JFK Industrial Estate and there are a number of industrial warehouse units in the immediate vicinity of the subject site. The JFK Industrial Estate is proximate to Western Industrial Estate and Western Business Park, Park West Industrial Park, and Ballymount Industrial Estate. Kylemore Luas stop is situated c. 900 metres/ c. 11-minute walk from the site. The M50 is the main arterial route in the area, and it is located approximately 1.4km from the site. Please see Figure 2.2 below for the site context.





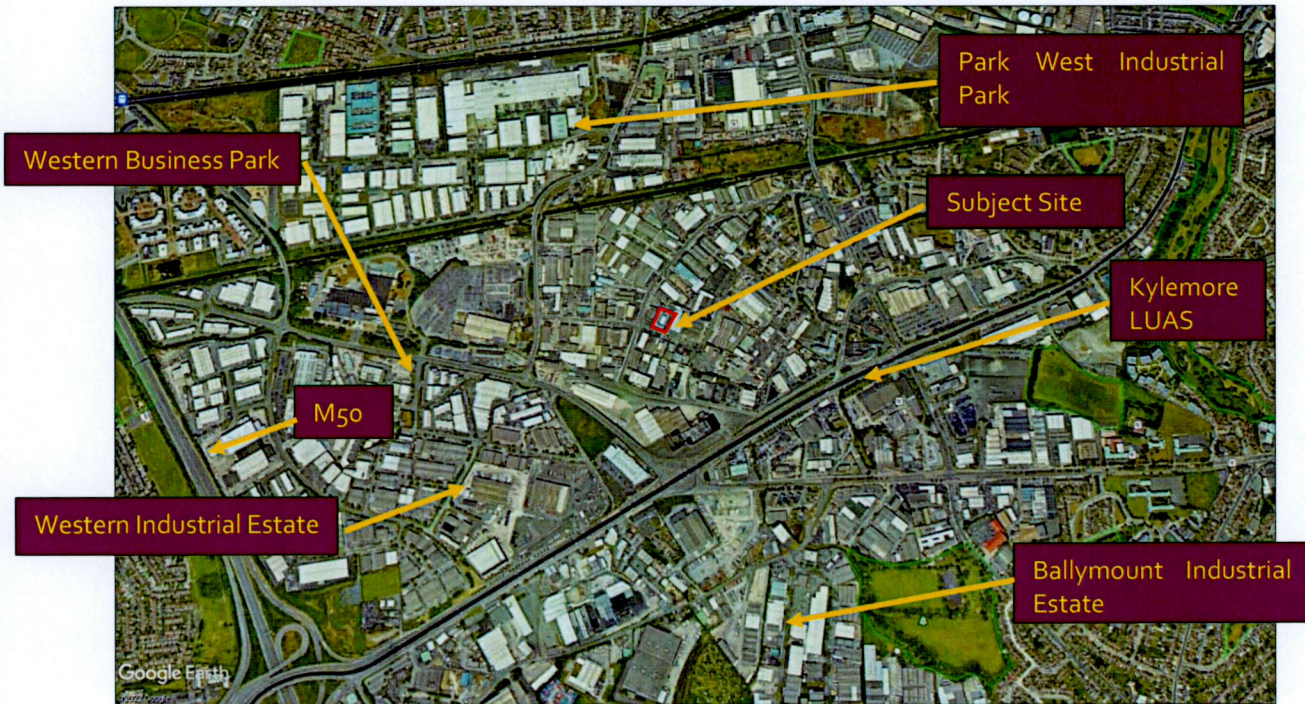


Figure 2.2: Aerial Photograph Identifying the Surrounding Context of the Subject Site (Red Line of the Subject Site is Indicative Only)

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





2.3 Site Description

The lands are rectangular in shape and are industrial in nature, with a warehouse currently situated at the site, with associated external storage and weigh bridge. The subject site has a generally flat topography and images of the site have been provided below for reference. Figure 2.4 below shows the subject site from JFK Road orientated towards the front of the development.



Figure 2.4: View of Subject Site from JFK Road (Arrow in Red Indicates the Camera Direction)

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





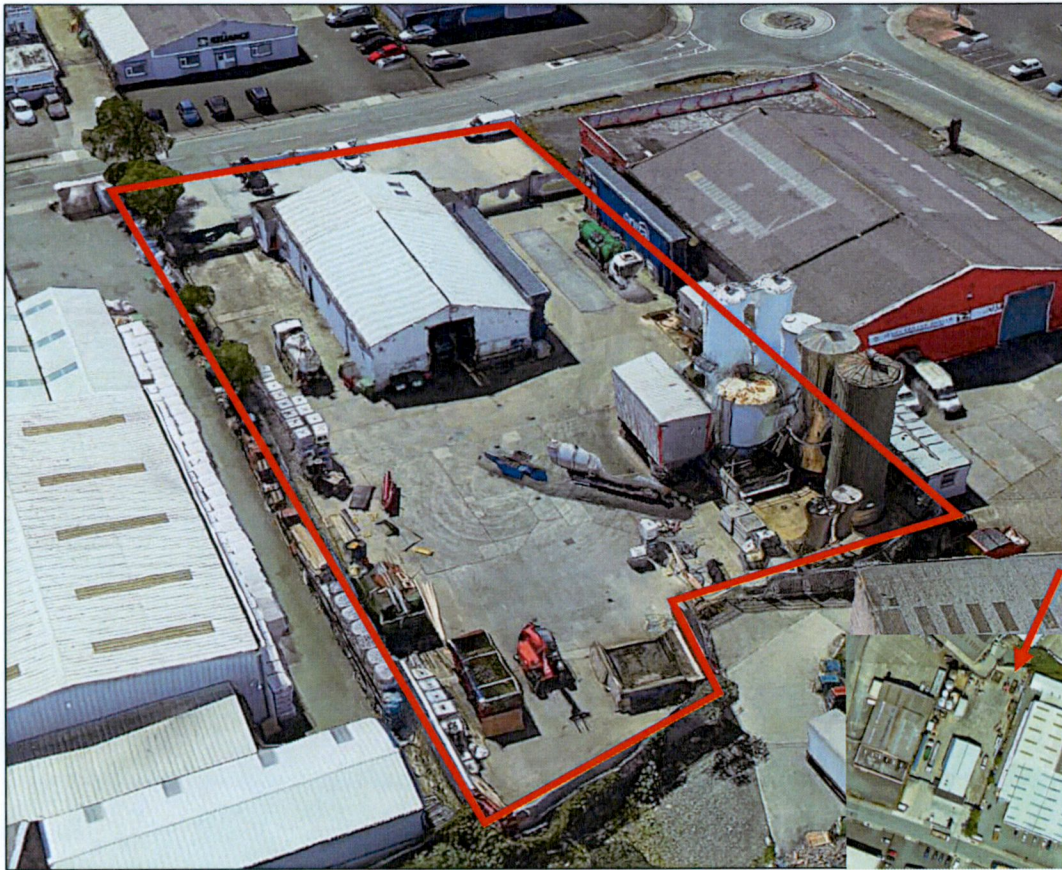


Figure 2.5: Images of The Subject Site With Arrow Indicating Camera Direction (Red Line Indicative Only)

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







Figure 2.6: Photograph of the Internal Existing Warehouse

Source: Photograph Supplied by GK Consulting Engineers Limited, 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:

- Kylemore Luas stop is located 900 meters/11 minute walk from the site.

The Red Line Luas allows easy access to a significant number 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 Kylemore Road and Old Naas Road.

- Route No. 13 – Grange Castle to Harristown (10–20-minute Frequency)
- Route No.68 – Newcastle/Greenogue Business Park to Hawkins St (Hourly)
- Route No. 69 – Rathcoole to Hawkins Street (Hourly)
- Route No. 151 – Foxborough to Docklands (20 Minute Frequency)

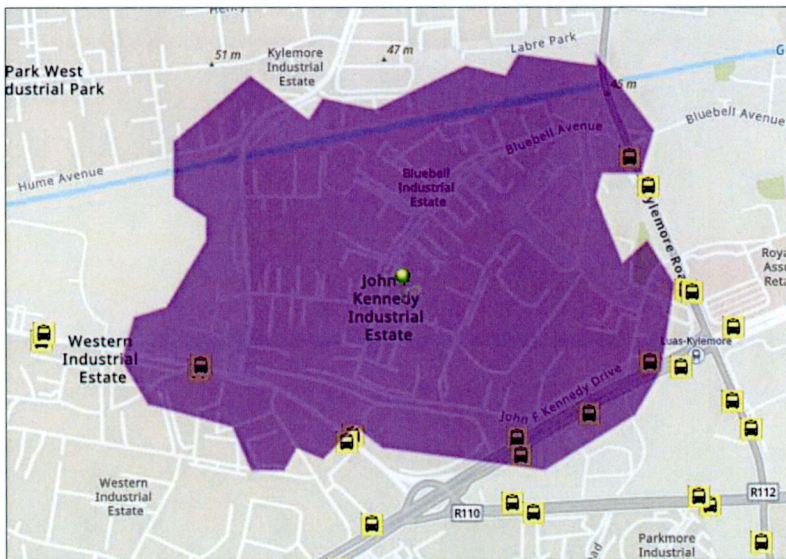


Figure 2.7: 10 Minute Walking Buffer from Subject Site Towards Nearby Bus Stops

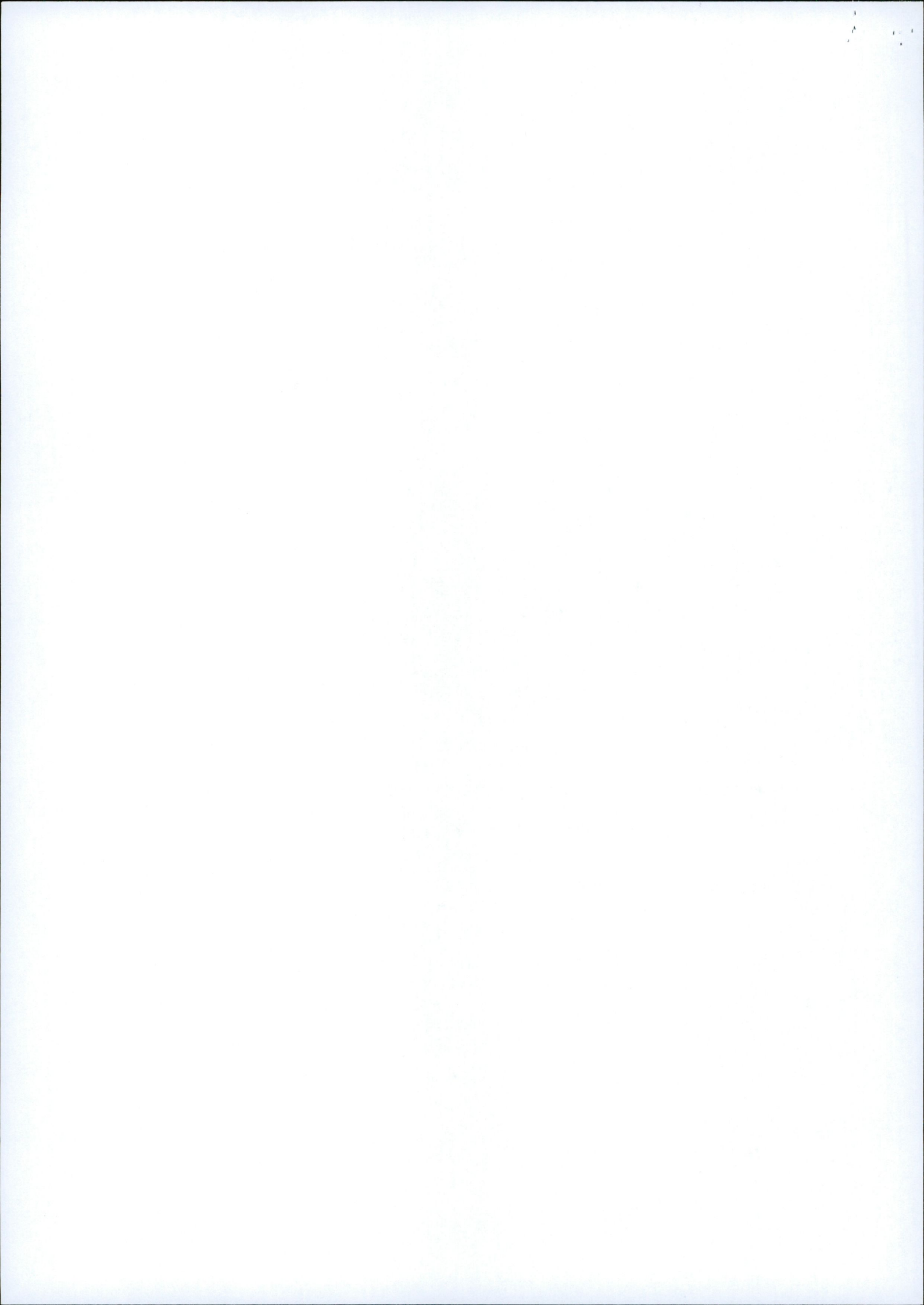
Source: Arc GIS Online Mapping Platform

### 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);
- Transport Corridor Upgrades (240km of upgrades over 16 No. Quality Bus Corridors, including cycle lanes and bus priority);
- Integrated ticketing and fares with Luas, DART and Commuter Rail.





### Proposed Network Redesign

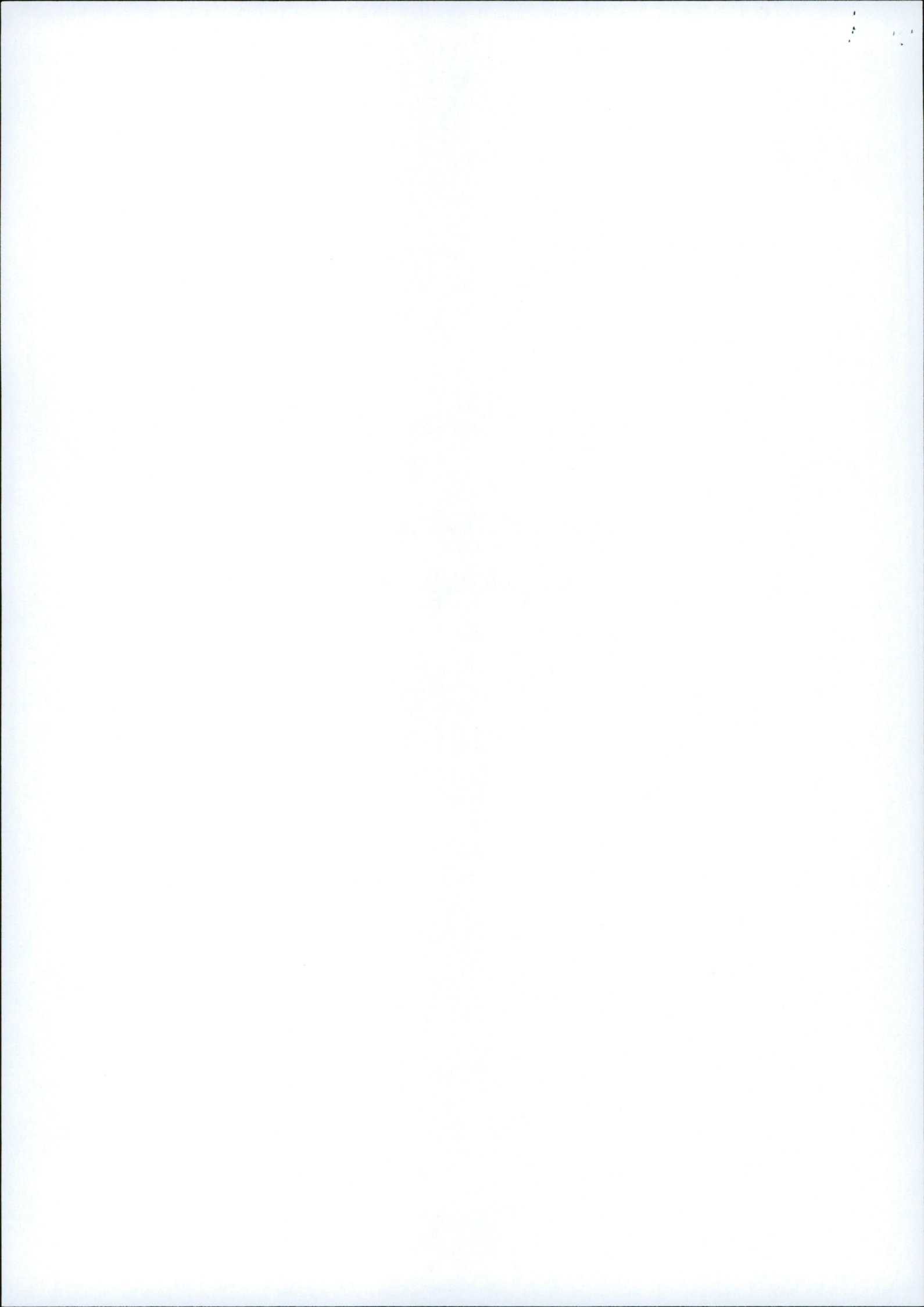
Three rounds of public consultation concluded in 2020 which resulted in a redesigned network comprising 8 No. Route Spines (with additional spurs/branches), increased local/ feeder route coverage, orbital routes, and peak-time only express services.

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:
<b>Route Spines</b>		
Route No. D1	Clongriffin – Grange Castle	15 No. Minute Frequency
Route No. D3:	Clongriffin– Clondalkin	15 No. Minute Frequency
<b>Other City Bound Routes</b>		
Route No. 58:	Rathcoole - City Centre - Dublin Port	1 No. Hour (6am- 11pm)
<b>Orbital Routes</b>		
Route No. S4:	Liffey Valley- Ballyfermot- Crumlin- Milltown- UCD	15-30 No. minute frequency (6am- 10pm)

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:





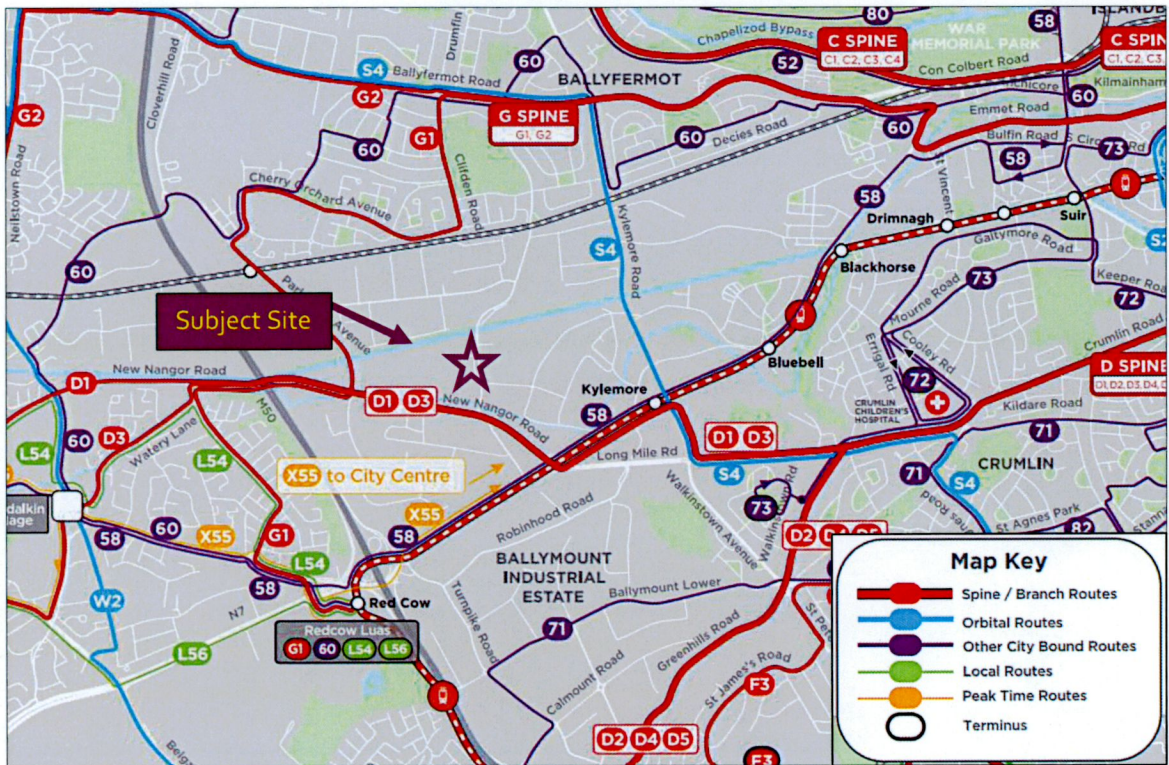


Figure 2.8: Proposed Bus Connects Network Redesign

Source: Busconnects.ie, Big Picture Map 2020, annotated by Thornton O'Connor Town Planning, 2022.



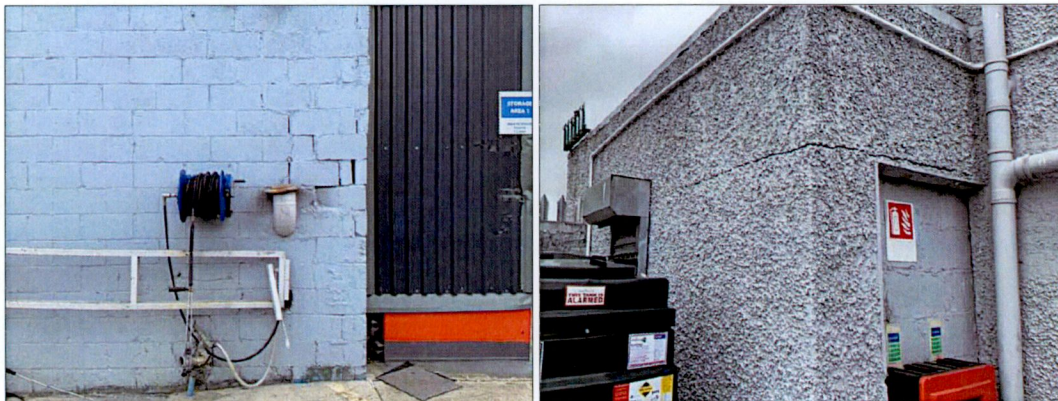


**3.0 RATIONALE FOR THE PROPOSED REVITALISATION WORKS TO THE EXISTING FACILITY**

The proposed works will modernise and improve the facility operated by JFK Environmental Limited at John F Kennedy Industrial Estate. The warehouse unit is associated with the use of the wider site as an EPA licensed facility.

The subject facility processes hazardous and non-hazardous aqueous waste and sludge for treatment and disposal from environmental and waste management service providers. Waste accepted on site includes inceptor waste, leachate, tank cleaning waste, oil contaminated waste and industrial waste. The company specialises in the separation of water mixed with waste oil which is performed in specialist reinforced concrete tanks to the rear of the premises.

The current warehouse building is outdated and in need of redevelopment. For example, there is significant cracking evident around the openings and corners of the external walls and there are cracks visible on the internal walls.



**Figure 2.9: Photographs Demonstrating Cracking on the Existing Warehouse**

**Source: Photograph Supplied by GK Consulting Engineers Limited, 2022**

The proposed development is therefore an upgrade on the existing structure which will modernise both the functionality and appearance of the site. Importantly, there is no intensification of the use proposed by the modernised warehouse facility.





#### 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 records 2 No. planning applications on the subject site.

##### 4.1.1 SDCC Reg. Ref: S01A/0629

<b>SDCC Reg. Ref.:</b>	S01A/0629
<b>Address:</b>	JFK Road, JFK Industrial Estate, Naas Road, Dublin 12.
<b>Applicant:</b>	Mr. L. MacAnulty
<b>Application Date:</b>	25 <sup>th</sup> September 2001
<b>Description of Development:</b>	<i>"Construct an underground reinforced concrete tank (415 cubic metres) for the separating of water mixed with waste oil to the rear of premises."</i>
<b>SDCC Decision:</b>	Grant (Subject to 5 No. Conditions)
<b>Decision Date:</b>	8 <sup>th</sup> February 2002
<b>Final Grant Date:</b>	21 <sup>st</sup> March 2002

On 25<sup>th</sup> September 2001, planning permission was sought for the construction of an underground reinforced concrete tank. The purpose of this tank was for the separating of water mixed with waste oil to the rear of the premises. Permission was granted on 8<sup>th</sup> February 2002 with a Final Grant of Permission issuing on 21<sup>st</sup> March 2002.





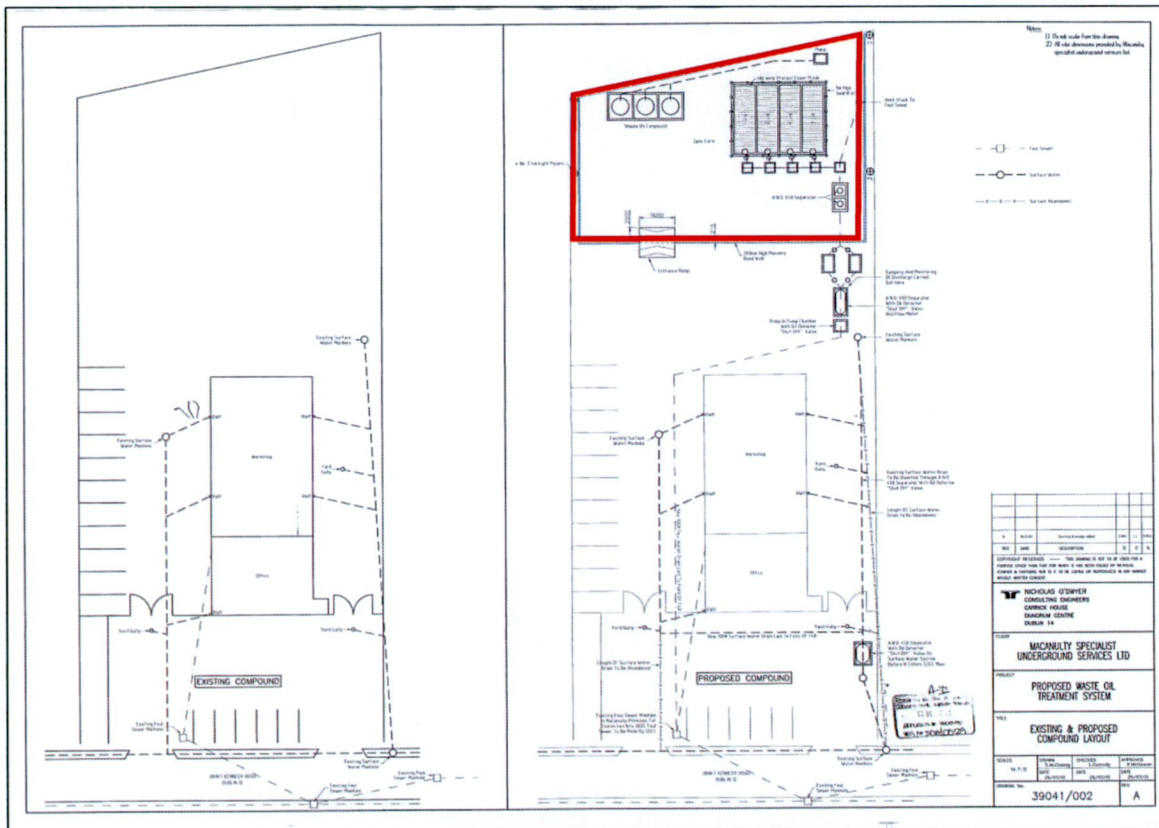


Figure 4.1: Proposed Layout of Concrete Tank (Area of Works Outlined Indicatively in Red)

Source: Extract from SDCC Reg. Ref. S01A/0629

4.1.2 SDCC Reg. Ref: SD20A/0141

SDCC Reg. Ref.:	SD20A/0141
Address:	JFK Road, JFK Industrial Estate, Nass Road, Dublin 12.
Applicant:	JFK Environmental Ltd.
Application Date:	30 <sup>th</sup> November 2020
Description of Development:	"Upgrade to the existing permitted sludge storage sump and banded liquid waste storage area. This upgrade will consist of retention of an increase in height of the pre-existing reinforced concrete wall in order to raise the wall around the east, west and rear elevations to a uniform height of 2.64m, and permission for the construction of a single skin cladded roof to cover this storage area of 170sq.m, construction of single skin cladded sides from the top of the reinforced concrete walls at the east, west and rear elevations to the roof. The enclosure will remain open at the front elevation. The covered area will slope from a height of 6.49m at the front elevation to a height of 3.92m at the rear elevation. The activity being carried out at the site is one that requires an Industrial Emissions Licence from the EPA".











#### 4.2 Overview of Relevant Planning History of Nearby Sites in JFK Industrial Estate and Environs

A search of the South Dublin County Council Online Search Facility details relevant developments in proximity to the subject site. The most relevant applications are identified on the aerial photograph below and are detailed in the sections following. The majority of the past planning applications surrounding the site are minor such as signage and storage unit applications and therefore are not perceived to be relevant to the proposed development.

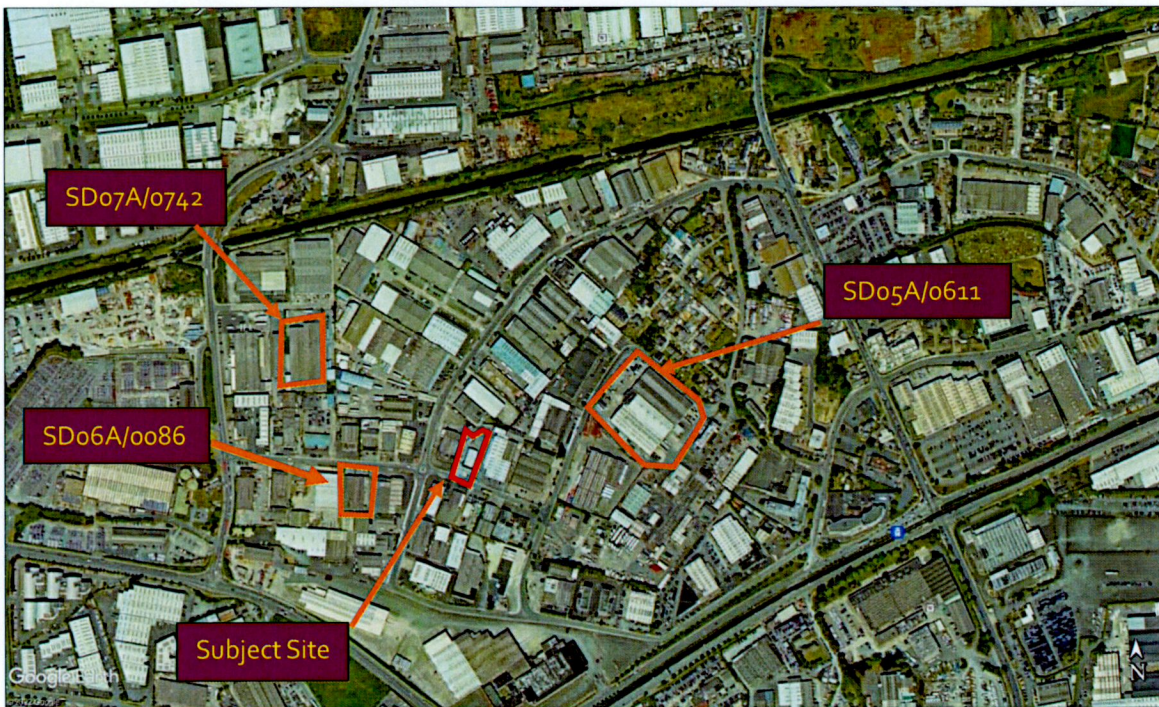


Figure 4.4: Aerial Photograph Identifying Relevant Planning Applications in the Immediate Vicinity of the Subject Site (Subject Site Outlined Indicatively in Red)

Source: South Dublin Online Search Facility, annotated by Thornton O'Connor Town Planning, 2022





#### 4.2.1 Application for Demolition of Part of a Warehouse and Replacement with a Two Storey Extension

Reg. Ref	SD05A/0611
Applicant:	MMC Commercials Ltd
Address:	Kore Development Park, John F. Kennedy Drive, Naas Road, Dublin 12
Description of Development:	<i>"Demolition of part of the existing warehouse, replacement of the same with an extension to existing warehouse including two storey office unit attached to warehouse extension, provision of car parking, minor internal alterations and elevational alterations to existing adjoining warehouses."</i>
SDCC Decision:	Grant Permission
Decision Date:	15 <sup>th</sup> September 2005
Final Grant Date:	26 <sup>th</sup> October 2005

#### 4.2.2 Application for the Demolition of an Existing Warehouse and Construction of New Warehouse

Reg. Ref	SD07A/0742
Applicant:	Centrepark Properties Ltd
Address:	Unit 4, John F. Kennedy Park, Killeen Road, Bluebell, Dublin 12
Description of Development:	<i>"The demolition of the existing industrial warehouse structure; the construction of a replacement warehouse structure with signage (approx. 3,893sqm gross floor space) including ancillary office space; 44 no. car parking spaces; 1 no. totem sign (approx. 10m in height); security access gate on northern boundary; boundary treatment; landscape works; and all associated site developments all on a site area of approx. 0.914 hectares. The proposed replacement structure will rise to an overall height of approx. 19.3m. It is proposed to maintain vehicular access to the site via the existing site entrance."</i>
SDCC Decision:	Grant Permission
Decision Date:	29 <sup>th</sup> May 2008
Final Grant Date:	9 <sup>th</sup> June 2008

#### 4.2.3 Demolition of an Existing Building and Construction of a New Building

Reg. Ref	SD06A/0086
Applicant:	Lawlor Brothers Waste Disposal Ltd
Address:	Lawlor Brothers Waste Disposal Limited, Unit 28, JFK Road, JFK Industrial Estate, Naas Road, Dublin 10
Description of Development:	<i>"Demolition of the existing building and construction of a new building in its place (1,693sq.m. as per existing building to be demolished). The redevelopment site together with their existing facility will be used for the recycling of dry non-hazardous commercial, industrial, construction, demolition and household waste at a rate of 95,000 tonnes per annum. The redevelopment works will also include for the installation of a wheel wash, a truck wash and an oil and fuel storage bund. The application is</i>







	<i>accompanied by an Environmental Impact Statement. The proposed development requires a waste license."</i>
SDCC Decision:	Grant Permission
Decision Date:	21 <sup>st</sup> April 2006
Final Grant Date:	2 <sup>nd</sup> June 2006

The proposed development under SDCC Reg. Ref. SDo6A/oo86 consisted of a new c. 13.28 metre high warehouse.

The Planning Officer noted that

*"The proposed development is an intensification of an existing approved use. While it is proposed to significantly increase the capacity of the established use on the site it is considered that the proposed development is acceptable in and would not be contrary to council policy, the zoning or established uses in the area."*

Therefore, the principle of providing a higher replacement warehouse in the vicinity has been established. It is considered that the development proposed under the current application will ensure that the site is modernised with a new high-quality warehouse.

#### 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 replacement warehousing on surrounding landholdings. The industrial context in the vicinity provides a strong employment base for South Dublin. The proposed replacement warehouse development has been designed to ensure that it is fully respectful of both existing and permitted industrial and commercial development in the local area and will provide a contemporary and modern high-quality warehouse on site to meet the needs of the Applicant.





## **5.0 PROPOSED DEVELOPMENT IN DETAIL**

### **5.1 Description of the Proposed Development**

JFK Environmental Limited intend to apply for permission for development at this c. 0.297 Ha. site at JFK Environmental Limited, John F Kennedy Road, John F Kennedy Industrial Estate, Dublin 12, D12 CF34, which operates as an EPA licensed facility.

The development will comprise the demolition of the existing warehouse and ancillary office space (c. 459 sq m) and 2 No. curtain sided storage racks (c. 46 sq m), and the provision of a new warehouse with ancillary office space (c. 746 sq m) and associated development. The proposed warehouse will have a maximum height of c. 11.15 metres.

The development will also include: the minor repositioning of an internal gate; the rearrangement of car parking spaces comprising a reduction from 10 No. to 7 No. car parking spaces (including the provision of an accessible parking space); bicycle parking; the provision of a sectional door on the north-east elevation; external signage; rooflights; lighting; boundary treatments; and all associated site development works above and below ground.

### **5.2 Summary of the Proposed Development**

The key elements of the proposed development are as follows:

- Demolition of the existing warehouse and ancillary office space (c. 459 sq m).
- Demolition of the 2 No. curtain sided storage racks (c. 46 sq m).
- Construction of a new warehouse with ancillary office space (c. 746 sq m).
- The proposed replacement warehouse will have a maximum height of c. 11.15 metres.
- Rearrangement of car parking spaces comprising a reduction from 10 No. to 7 No. car parking spaces (including the provision of an accessible parking space).

An extract from the proposed Site Layout Plan is provided in Figure 5.2 below for reference:





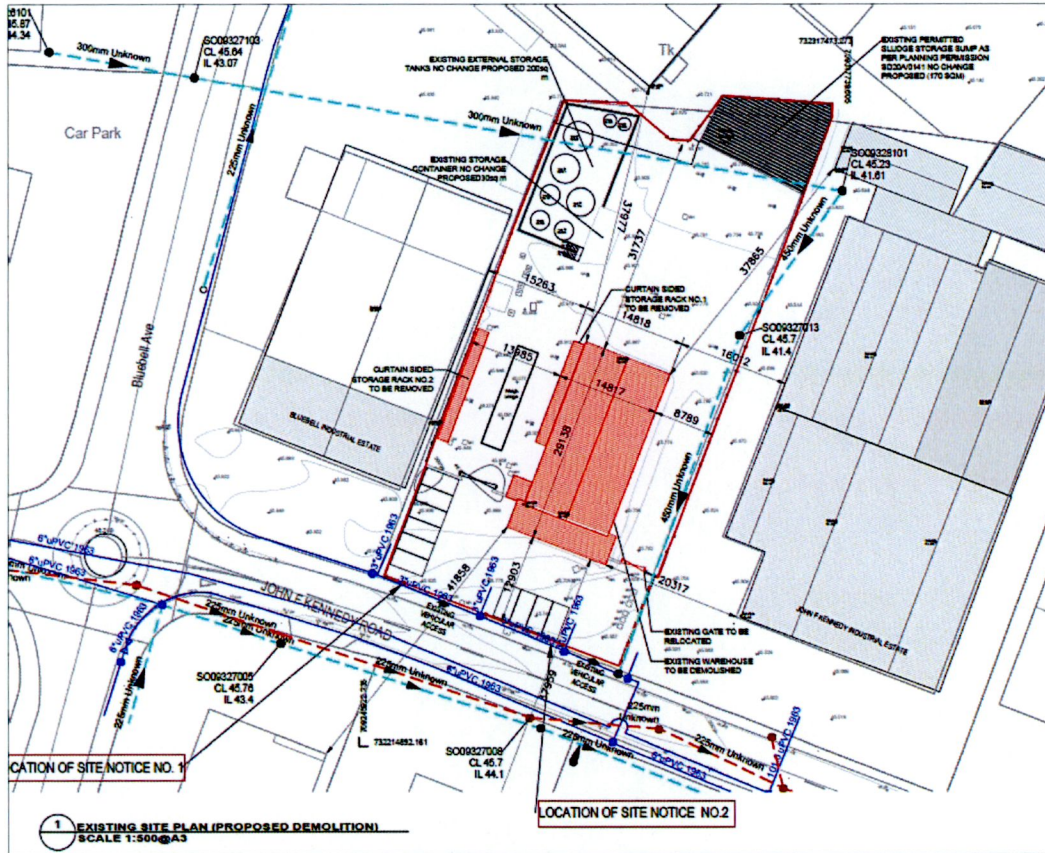


Figure 5.1: Existing Site Plan (Drawing No.: B0125-A-002)

Source: ODA Architects, 2022





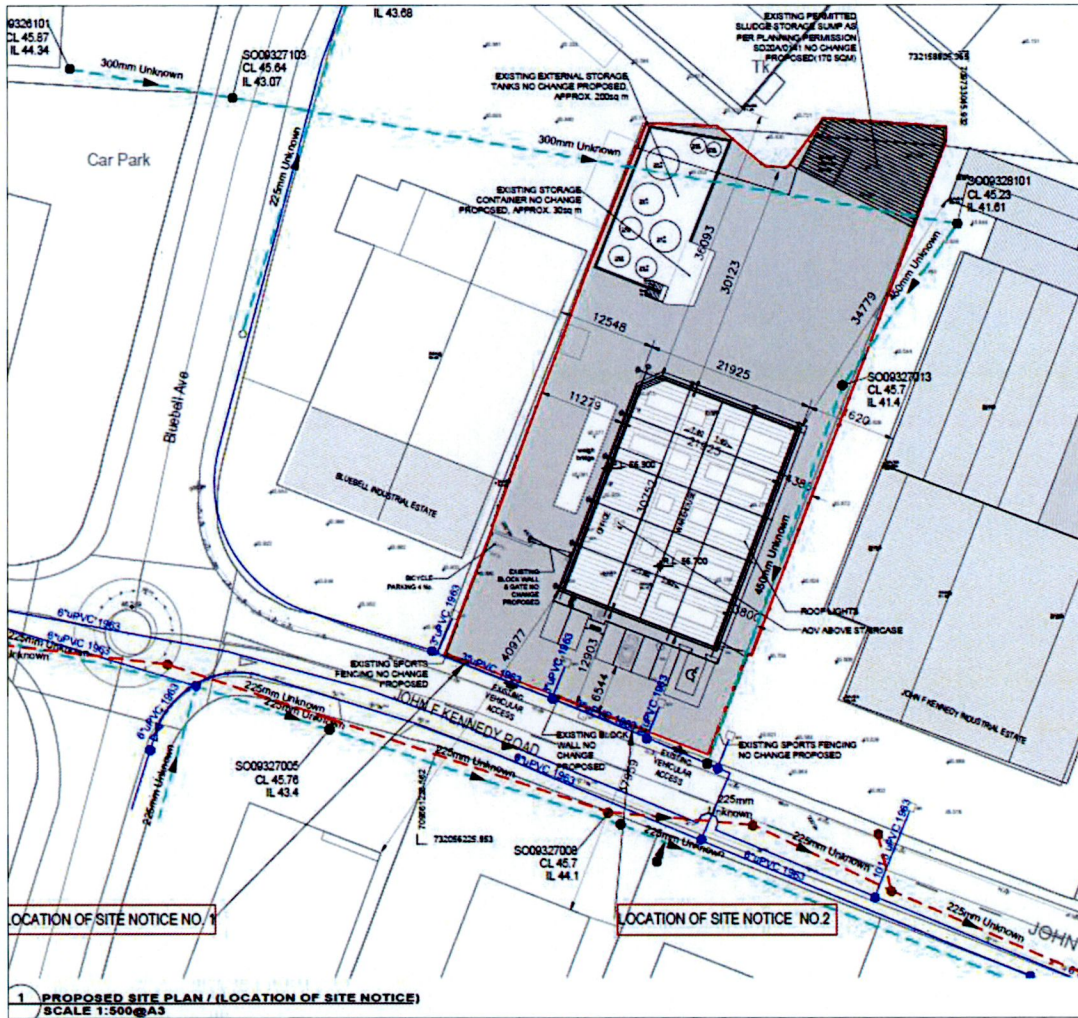


Figure 5.2: Proposed Site Plan (Drawing No.: B0125-A-003)

Source: ODA Architects, 2022



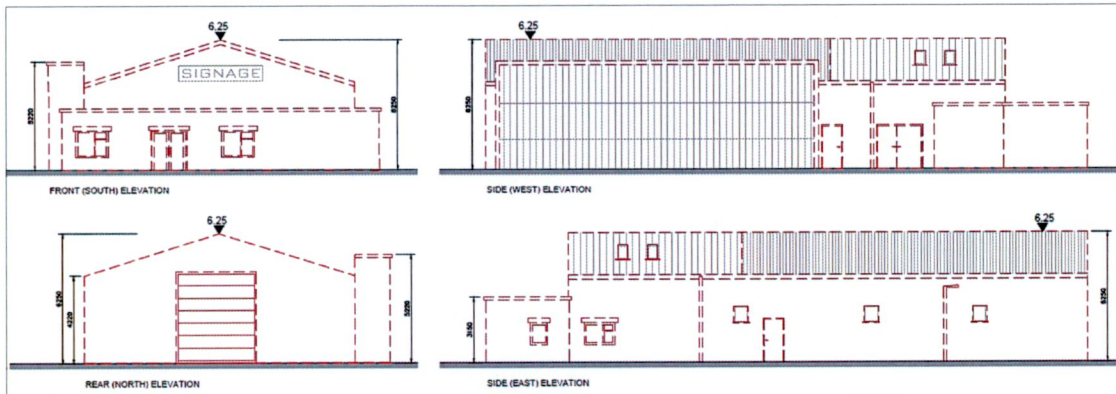


Figure 5.3: Existing Elevations (Drawing No.: B0125-A-004)

Source: ODA Architects, 2022

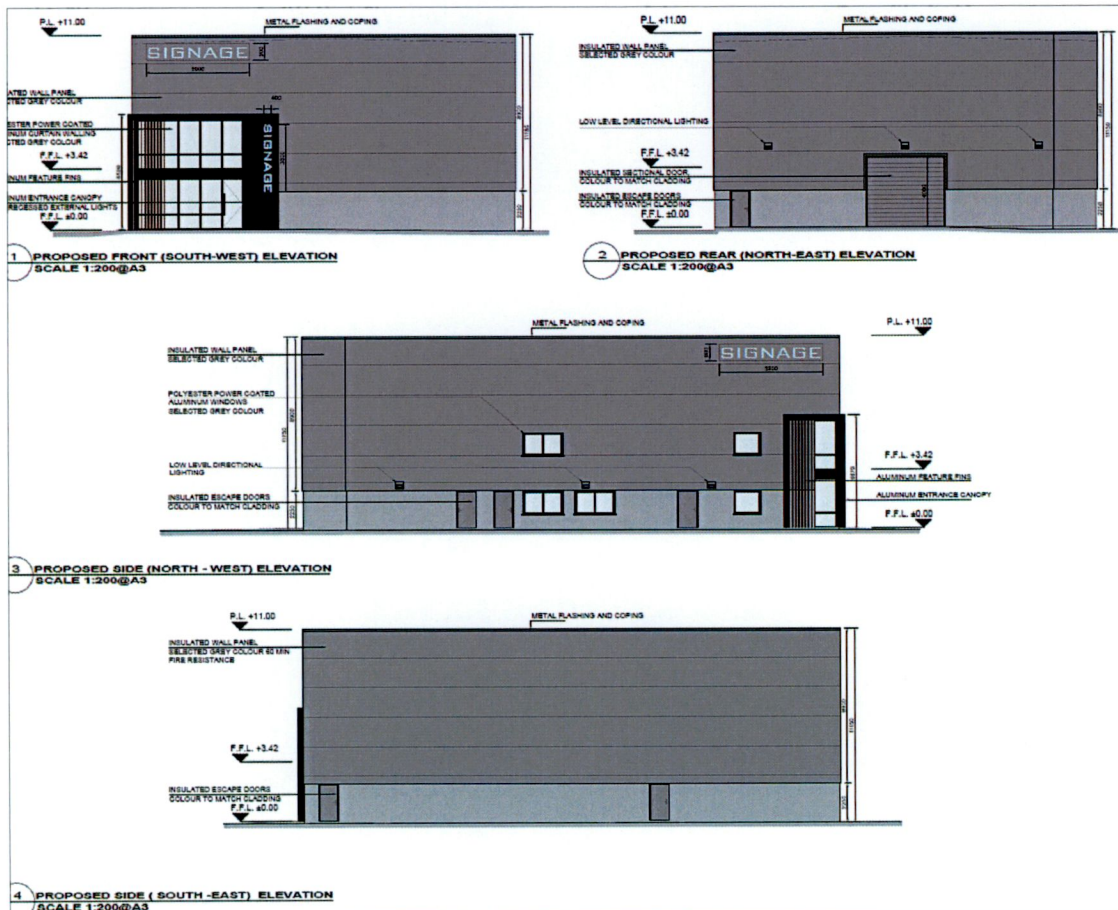


Figure 5.4: Proposed Elevations (Drawing No.: B0125-A-012)

Source: ODA Architects, 2022







The proposed development will principally provide a high-quality contemporary warehouse in lieu of the existing outdated warehouse on site. The warehouse unit is associated with the use of the wider site as an EPA licensed facility. The proposed replacement warehouse will modernise both the functionality and appearance of the site. The proposed development will relocate the external storage internally within the proposed replacement structure (currently located within curtain sided storage racks external to the building). This will significantly improve views towards the subject site and will thus improve the surrounding environs.





## 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 2022 – 2028* (“*Development Plan*”) is the statutory plan for the area and guides development relating to the subject site.

### 6.2 Zoning – Objective ‘REGEN’

The subject site is zoned ‘Objective REGEN – Regeneration’ in the *Development Plan*, where the objective is “*To facilitate enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery*”.

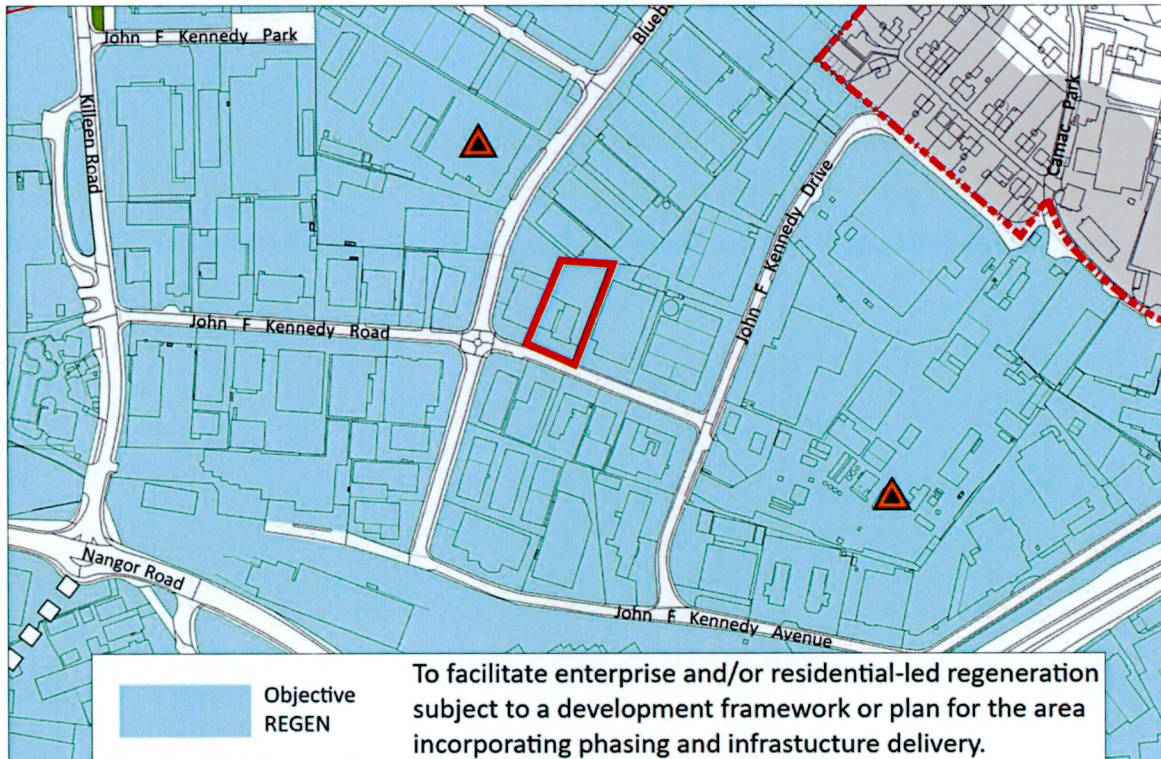


Figure 6.1: Zoning Map of the Subject Lands (Indicative Boundary Outlined in Red)

Source: *South Dublin County Council Development Plan 2022-2028*, Map No. 5, annotated by Thornton O’Connor Town Planning, 2022





Permitted in Principle and Open for Consideration Uses for sites zoned as 'REGEN' are outlined in the table below:

<b>Permitted in Principle</b>	Advertisements and Advertising Structures, Childcare Facilities, Community Centre, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel/ Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq.m, <b>Offices 100 sq.m – 1,000 sq.m</b> , Offices over 1,000 sq.m, Open Space, Petrol Station, Public Services, Recreational Facility, Residential, Restaurant/Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local, Sports Club/Facility, Stadium, Traveller Accommodation, Work-Live Units.
<b>Open For Consideration</b>	Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, Data Centre, Doctor/Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, <b>Warehousing</b> , Wholesale Outlet
<b>Not Permitted</b>	Abattoir, Aerodrome/Airfield, Agriculture, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, Fuel Depot, Heavy Vehicle Park, Industry-Extractive, Industry Special, Nightclub, Outdoor Entertainment Park, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Shop-Major Sales Outlet, Transport Depot, Wind Farm.

Figure 6.2: Table of Use Class Related to Land Use Zoning for REGEN zones

Source: *South Dublin County Council 2022-2028 Development Plan*

As seen in the table above, Warehousing is listed as an "Open for Consideration" use. The development proposes the demolition of the existing outdated warehouse and the construction of a new high-quality warehouse in its place. Warehousing is 'Open for Consideration' at the subject site and there is an existing warehouse use already in place at the lands. The development also includes 230 sq m of ancillary office space. Offices between 100 sq m and 1000 sq m are permitted in principle at the subject lands. Nonetheless, we reiterate that this office space is ancillary to the principal warehouse use and thus is warehousing in terms of the use class. The proposed development will improve the visual appearance of the subject lands in line with the objective of South Dublin County Council to facilitate the regeneration of the area. It is our





opinion that the proposed development is in accordance with the zoning provisions pertaining to the site in the *South County Dublin Development Plan 2022-2028*.

### 6.3 Relevant Policies of the *South Dublin County Council Development Plan 2022-2028*

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

Policy	It is a policy of the Council:
<b>QDP12 Objective 3</b>	<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>
<b>QDP12 Objective 4</b>	<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>
<b>EDE5 Objective 6</b>	<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>

The proposed scheme is in accordance with the relevant policies of the *Development Plan* set out above. The proposal will facilitate the continued operation of the warehouse associated with the EPA licenced facility at the subject lands and will ensure that the streetscape is improved by the modernised facility proposed.

### 6.4 Building Height Under the *South Dublin County Development Plan 2022-2028*

Table 12.27 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 c. 11.15 metres, which can be assimilated into the surrounding industrial context. The proposed development will provide a modernised high-quality development and will relocate the external storage internally within the proposed replacement structure (currently located within curtain sided storage racks external to the building).

## 6.6 Car Parking and Cycle Parking

### 6.6.1 Car Parking

The maximum car parking standards are set out in Table 12.25 of the *South Dublin County Development Plan 2012 – 2028*, and includes the following standards for offices and warehouses:

Category	Zone 1	Zone 2
Warehousing	1 per 100 sq m	1 per 200 sq m
Offices:	1 per 50 sq m	1 per 75 sq m

The subject site is located within Zone 2<sup>5</sup> and therefore, based on the maximum standards set out above, the proposed development generates a maximum of 6 No. spaces (warehouse floor area (516 sq m = 3 No. spaces) and ancillary office floor space area (230 sq m = 3 No. spaces)).

It is proposed to provide 6 No. standard car parking spaces, with an additional 1 No. accessible space, therefore slightly exceeding the standard by 1 No. car parking space. However, we would like to highlight that the current situation on site includes 10 No. parking spaces and thus the reduction down to 7 No. parking spaces represents the sustainable development of the area. This is considered to be an acceptable provision in the interests of sustainable development and adequately provides for the car parking requirements of the existing facility.

### 6.6.2 Bicycle Parking

Table 12.23 of the *Development Plan* sets out the minimum bicycle parking standards for warehousing and offices as 1 per 200 sq m GFA. Therefore based on the provision of a 746 sq m warehouse, the bicycle parking requirement would be 4 No. spaces. Some 4 No. spaces are provided as part of the proposed development which meets Development Plan standards.

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<sup>5</sup>Zone 2 (Non-Residential) is described as "More restrictive rates for application within town and village centres, **lands zoned REGEN**, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction)".



## 6.7 Non-Statutory Strategic Framework- City Edge Project

The site is located within the City Edge Project at the western edge of Dublin City. The *City Edge Strategic Framework* was issued in June 2022 and notes the following in Section 1.1.4:

*"This Strategic Framework is a **non-statutory plan** that sets out a high-level approach and transformational trajectory for the regeneration of City Edge to create a new liveable, sustainable and climate resilient urban quarter. It will be followed by a more comprehensive Statutory Plan which will guide development at a finer level of detail. **It should be noted that as the Strategic Framework is a non-statutory document, it does not form a basis for development consent.**" [Our Emphasis].*

Section 4.15 of the *City Edge Strategic Framework* states the following in relation to the proposed land uses in the City Edge Project Area:

- Evolve the area to accommodate higher density employment alongside residential and community infrastructure, whilst accommodating existing uses**
- Create a commercial focus of high density employment activity focused around the new major centre at Naas Road, and at Kylemore
- Create a concentration of industrial and employment uses along the eastern side of the M50 corridor
- Create a series of residential-led mixed-use nodes that focus ground floor commercial activity, including urban workspace, around high streets and transport interchanges, with residential and employment uses filling the spaces between."

Section 7.4.1 of the *City Edge Strategic Framework* states the following in relation to industrial development in the City Edge Area:

**"City Edge is a long established industrial and commercial area of Dublin City. The area has long been recognised as a primary employment area over several decades, initially providing the space required for traditional industry to locate and grow within the city. The area continues to retain an important function both in employment and economic value terms.**

*One of the key land use issues affecting the Greater Dublin Area and, in particular City Edge, is the current demand for industrial land / property. Over the last number of years, the demand for industrial, logistics / distribution and warehouse floorspace has increased significantly...**The demand for industrial land / property doesn't show any sign of abating over the short-term** which is expected to continue to drive land / property values up."* [Our Emphasis]

Section 7.4.6 of the *City Edge Strategic Framework* notes the following in relation to the sustainable location of the project lands:

*"City Edge has significant economic comparative advantages that it needs to optimise, particularly in terms of its location, **its established reputation as an industrial area,** its*







*transport and connectivity links (for e.g. M50 Motorway, N7 and Luas) and the critical mass of people already living and employed within the area, for example.” [Our Emphasis]*

While City Edge is currently a non-statutory document, it is clear that existing uses are to be accommodated. The subject scheme proposes to improve but not intensify the warehouse at the subject site. The visual improvement of the site as proposed will accord with the wider objectives of the City Edge project to transform the area in the vicinity of the site. The development ensures that the site will contribute towards retaining an important function for the area in employment and economic value terms.

## **6.8 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 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.”*

### **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.”*

The surrounding area is an established employment area 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 Western Industrial Estate and Western Business Park, Park West Industrial Park, and Ballymount Industrial Estate. The subject lands are capable of sustainably adhering to national objectives to







limit urban sprawl and unsustainable development, as the subject development involves the demolition of an existing warehouse that is no longer fit for purpose and replacement with a high-quality modern warehouse. Therefore, the proposed development is compliant with the *NPF*.

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

The proposed development to provide a warehouse with ancillary office is in accordance with the *Development Plan* policies pertaining to the site as the proposed development will ensure that the warehouse at the subject site is redeveloped to a high-quality standard. The development will also ensure the retention of a long established employment base at the subject site. Therefore, it is considered that the subject development represents the proper planning and sustainable development of the area.





## 7.0 PLANNING ADMINISTRATION

### 7.1 Planning Fee

- An EFT payment was made to South Dublin County Council in the amount of €2,765.60 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	€80 for each building, or €3.60 for each square metre of gross floor space to be provided, whichever is the greater.  (Provision of 746 sq m structure)	€2,685.60
Class 13	Development not coming within any of the foregoing classes (Development)	€80.00

### 7.2 Statutory Notices

- An original page of the Irish Daily Star published on 22<sup>nd</sup> September 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 22<sup>nd</sup> September 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 22<sup>nd</sup> September 2022.

### 7.4 Planning Report

- Six copies of this "Planning Report", prepared by Thornton O'Connor Town Planning, dated 22<sup>nd</sup> September 2022.

### 7.5 Appropriate Assessment by Enviroguide Consulting

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







## 7.6 Drawings by ODA Architecture

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

Drawings Prepared by ODA Architecture			
Drawing No.	Title	Page Size	Scale
B0125-A-001	Site Location Map	A3	1:1000
B0125-A-002	Existing Site Plan Proposed Demolitions Area	A3	1:500
B0125-A-003	Proposed Site Plan	A3	1:500
B0125-A-004	Existing Plans and Elevations to be Demolished	A3	1:200
B0125-A-005	Proposed Roof Plan	A3	1:200
B0125-A-010	Proposed Floor Plans	A3	As Shown
B0125-A-011	Proposed Section A-A	A3	1:100
B0125-A-012	Proposed Elevations	A3	1:200
B0125-A-013	Existing & Proposed Contextual Elevation	A3	1:200
B0125-A-014	Existing & Proposed Rear Contextual Elevation	A3	1:200







## 8.0 CONCLUSION

The proposed development represents a significant investment providing a replacement warehouse with ancillary offices on a site which currently comprises a warehouse and external storage. It is contended 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 Applicant's requirements for a taller warehouse and a larger floorplate and in order to continue to efficiently operate their business.

We trust you will find this application in order. Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Signed:

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

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Sadhbh O'Connor  
Director  
Thornton O'Connor Town Planning







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