

South Dublin County Council,
Land Use, Planning and Transportation Department,
County Hall
Tallaght,
Dublin 24,
D24 A3XC.

Date: 19th of December 2022
Our Ref.: LW JN 21023

Dear Sir/ Madam,

RE: PLANNING APPLICATION FOR PROPOSED CHANGE OF USE OF KNOCKMITTEN HOUSE FROM OFFICE USE TO LIGHT INDUSTRIAL USE AT KNOCKMITTEN HOUSE, KNOCKMITTEN LANE, WESTERN INDUSTRIAL ESTATE, DUBLIN 12

1.0 INTRODUCTION

On behalf of the applicant, Mashup Property Limited, we hereby submit this planning application for the change of use of the existing building on site (comprising 763 sq.m gross floor area) from office use to light industrial use (comprising the assembly of hampers and online orders at first floor area, digital device repair and refurbishment at second floor level, with ancillary staff canteen and reception area at ground floor level), at Knockmitten House, Knockmitten Lane, Western Industrial Estate, Dublin 12.

The site is bound to the north by Knockmitten Lane, and to the south, east, and west by existing commercial premises.

The proposed change of use will not result in any change to the external appearance of the existing building. The building will be used for the assembly of hampers and online orders at first floor level, and for digital device repair and refurbishment at second floor level, with ancillary staff canteen and reception area at ground floor level. The development also includes the provision of a bicycle store (6 no. spaces) at ground / undercroft level. The proposed use will not give rise to any additional requirement for car parking and will not necessitate any change to the external appearance of the building.

The applicant notes the emerging planning policy context for the subject site and other surrounding areas zoned for regeneration, and the current proposed change of use seeks to provide for a more efficient use of the subject building pending its likely redevelopment in the future.

This cover letter is accompanied by the following documentation prepared by the project design team:

- **Completed planning application form and attachments;**

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI
Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MScERM MAT&CP Dip EIA Mgmt. MIPI
Stephen Blair BA (Mod) MRUP MIPI MRTPI Blaine Cregan B Eng BSc MSc

Senior Associate Directors: Luke Wymer BA MRUP Dip Plg & Env Law Dip PM Prof Cert Env Mgmt MIPI
Meadhbh Nolan BA MRUP MRTPI Kate Kerrigan BA MSc MRTPI

Associate Director: Ian Livingstone MA (Hons) Town & Regional Planning, MSc. Spatial Regeneration. MRTPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2 D02 ND61. VAT No. IE 6416306U

- Copy of site notice and original copy of newspaper notice;
- Confirmation of EFT payment of the planning application fee (€2746.8);
- 6 no. copies of this Cover Letter prepared by John Spain Associates;
- 6 no. copies of Architectural Drawings, Drawing Schedule and Schedule of Accommodation prepared by Ferreira Architects;

2.0 SITE LOCATION AND DESCRIPTION

The subject site is located on the southern side of Knockmitten Lane, within the Western Industrial Estate, Dublin 12. Knockmitten Lane is defined by a mix of business and office uses located within low-rise structures, along with an element of existing residential use, in the form of a large detached house and its attendant gardens, located directly opposite the subject site. The site has an area of c. 0.1 hectares.

The site is bound to the north by Knockmitten Lane, and to the south, east, and west by existing commercial premises.

Knockmitten Lane comprises two lanes for vehicular traffic, along with pedestrian facilities along the majority of its length on both sides, and its entire length on its southern side. The appearance of the street is greatly improved by a significant number of mature street trees along the southern side of the street.

The site is within walking distance of the nearest Luas stop, which is c. 20 minutes from the site on foot, and c. 1.38 kilometres from the site as the crow flies. The site is also accessible by bus, including the no. 151 bus which serves the R134 to the north (c. 270 metres from the subject site), with services between Foxborough and the Docklands, also serving Dublin city centre, at a frequency of 20 minutes.

Further bus stops located within walking distance are located at the R110 Naas Road to the south, including the 13, 69, and 68 services providing links to Dublin City Centre, and Harristown with service frequencies of 15-20 minutes.

The site itself is currently occupied by a three-storey commercial office building, with surface parking to the front in addition to an element of undercroft parking. The site is accessed directly from Knockmitten Lane to the north.

The existing building on site features extensive grey cladding and strip windows providing a strong sense of horizontal emphasis. A row of seven reinforced concrete columns support the upper floors at ground floor level, with reception areas and undercroft parking set back behind the main building line at ground floor.

The existing building on site is set in close proximity to the southern boundary, with limited fenestration provided to its southern façade. To the west of the site, along the property boundary, is a row of coniferous evergreen trees, which are located on the adjoining site.

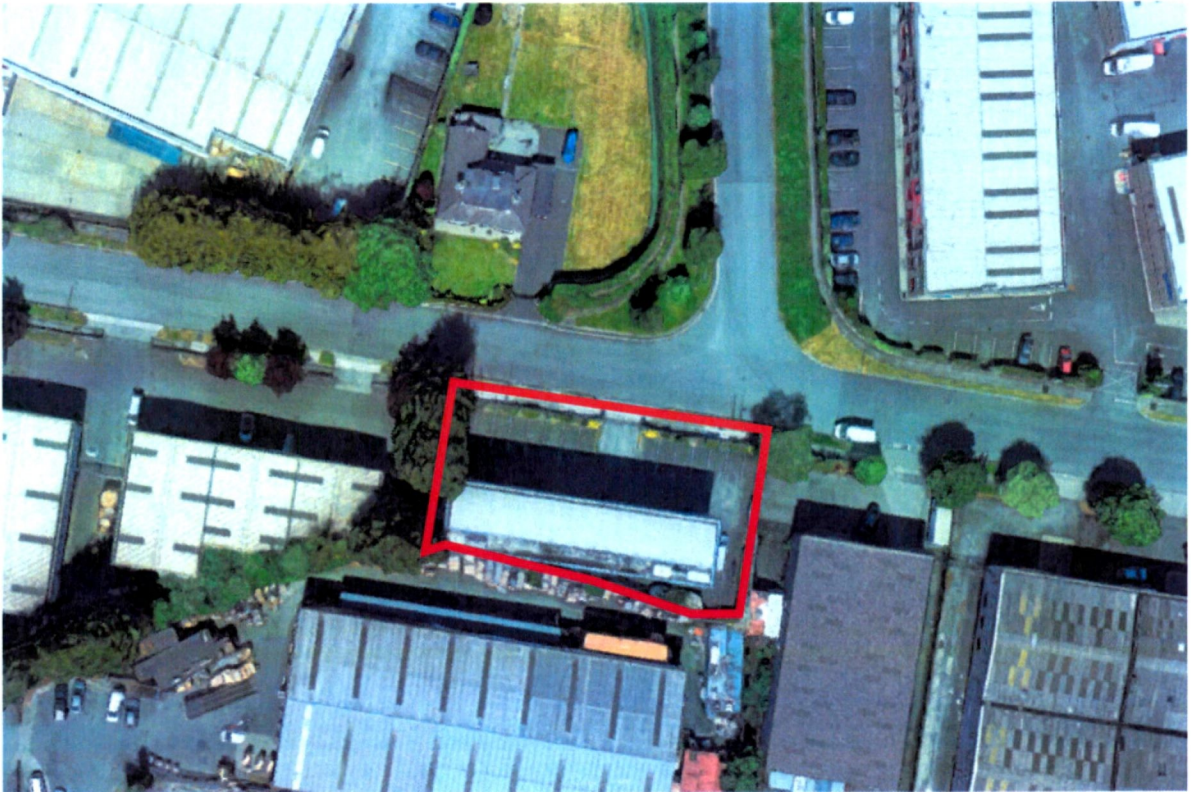


Figure 1: Aerial view of the subject site and surrounding are (Source: Google Maps)



Figure 2: View of the existing building on site from Knockmitten Lane

3.0 RELEVANT PLANNING HISTORY

Subject Site

The following comprises a summary of relevant planning history pertaining to the subject site. This planning history is based on a review of the South Dublin County Council online planning search system.

Reg. Ref.: S01A/0235 – Permission for the Existing Building on Site

On the 5th of November 2001, a final grant of permission was issued by the Planning Authority for development described as a “3 storey software development industry offices, and telemarketing facility.”

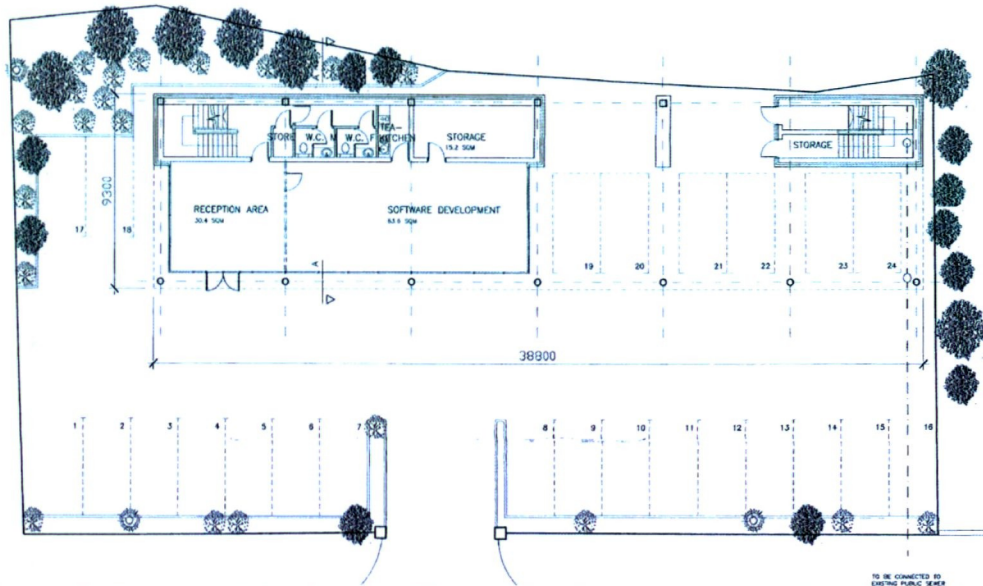


Figure 3: Extract of the Layout Plan of the development under Reg. Ref.: S01A/0235

Reg. Ref.: SD13A/0151

On the 29th of October 2013, a final grant of permission and retention permission was issued by the Planning Authority for the following development: “Permission for a ground floor extension to existing three storey office building to be located in the existing undercroft (open sided) car parking space together with provision of bicycle parking in new location to the rear (southern side) of the building; minor alterations to remainder of existing external car parking layout; associated miscellaneous alterations. Retention of existing fire exit door from stairway and existing access doors to plant room at ground level on the south elevation.”

The final grant of permission was subject to 8 no. conditions. Condition no. 2 required the incorporation of minor amendments to the proposals, including the installation of shower facilities for cyclists.

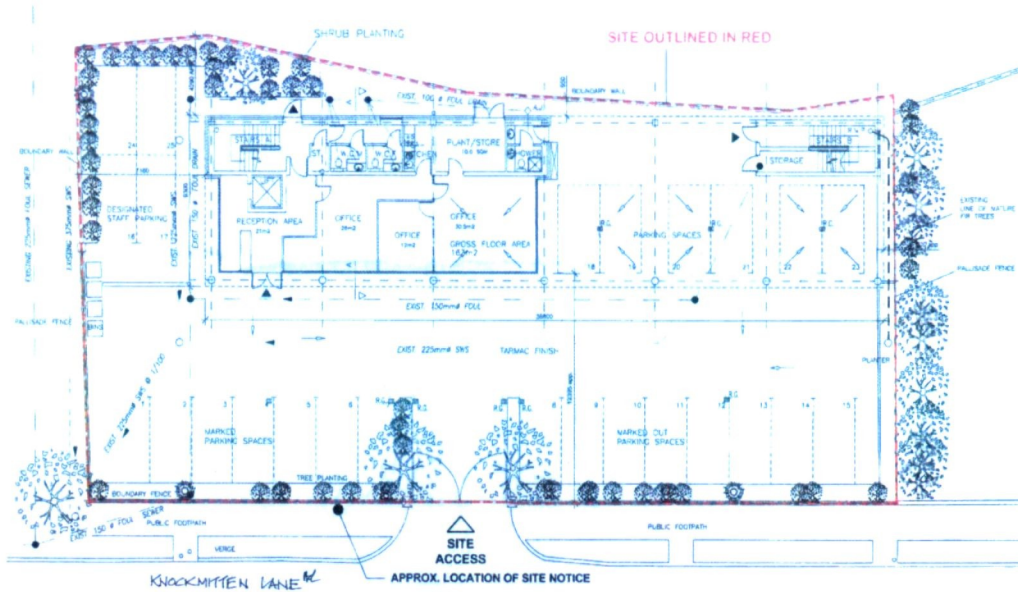


Figure 4: Extract of the Layout Plan of the development under Reg. Ref.: SD13A/0151

Reg. Ref.: S00A/0121

On the 28th of September 2000, a final grant of permission was issued by the Planning Authority for development comprising a “3 storey storage and office building”.

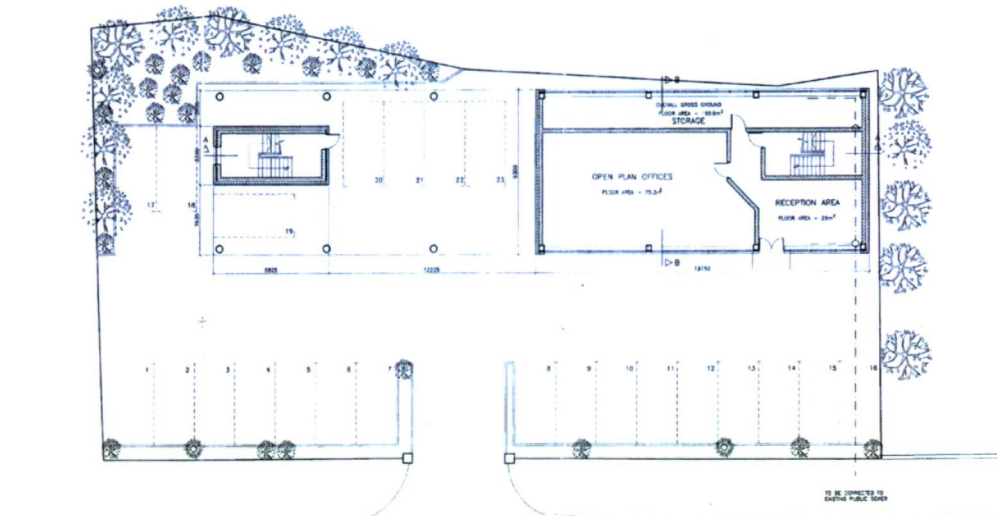


Figure 5: Extract of the Layout Plan of the development under Reg. Ref.: S00A/0121

Reg. Ref.: S99A/0323

On the 16th of August 1999, a final grant of permission was issued by the Planning Authority for development consisting of “a three-storey office and storage building” on the subject site.

Surrounding area

Reg. Ref.: S01A/0598

On the 10th of January 2002, a final grant of permission was issued by the Planning Authority for development consisting of a “Two storey offices within existing warehouse.” to the immediate south of the subject site.

Reg. Ref.: SD19A/0025

On the 18th of November 2019, a final grant of permission was issued by the Planning Authority for development to the north of the subject site described as follows:

- “(1) Construction of rear extension to existing warehouse (total extension area 500sq.m);
- (2) relocation of existing rear entrance along southern boundary and all associated works.”

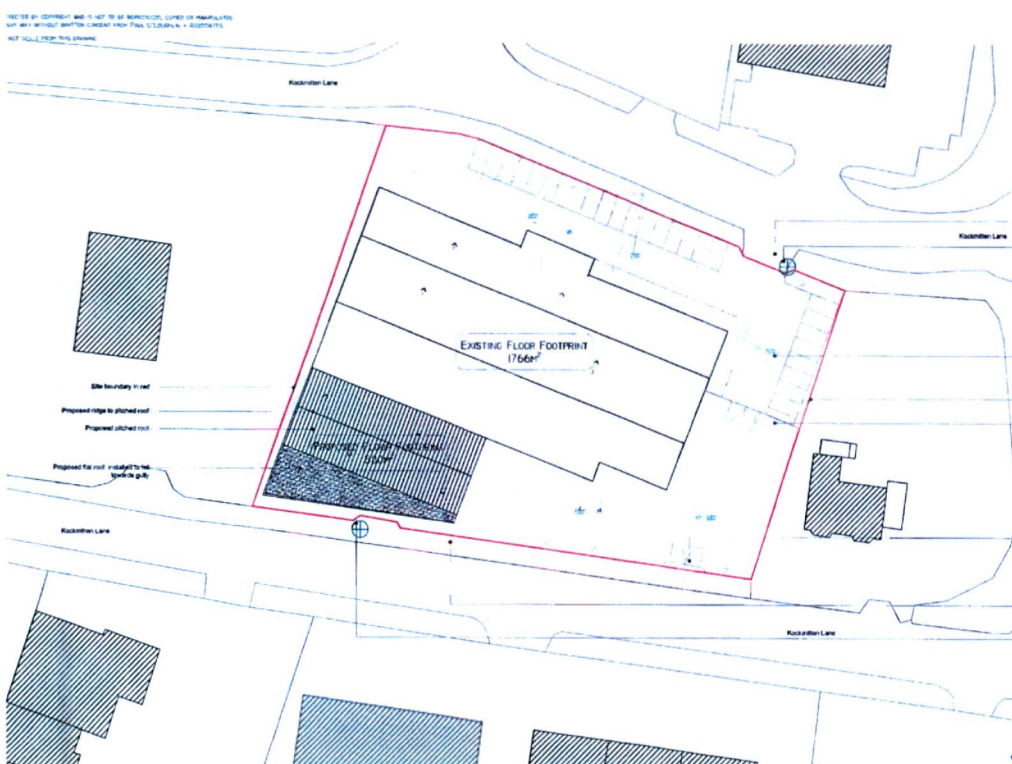


Figure 6: Extract of the Layout Plan of the development under Reg. Ref.: SD19A/0025

Reg. Ref.: SD19A/0230

On the 10th of October 2019, a final grant of permission was issued by the Planning Authority for development to the south of the subject site described as follows:

- “New mezzanine floor comprising 954sq.m as part of the racking installation and 47sq.m over ancillary offices for warehousing.”

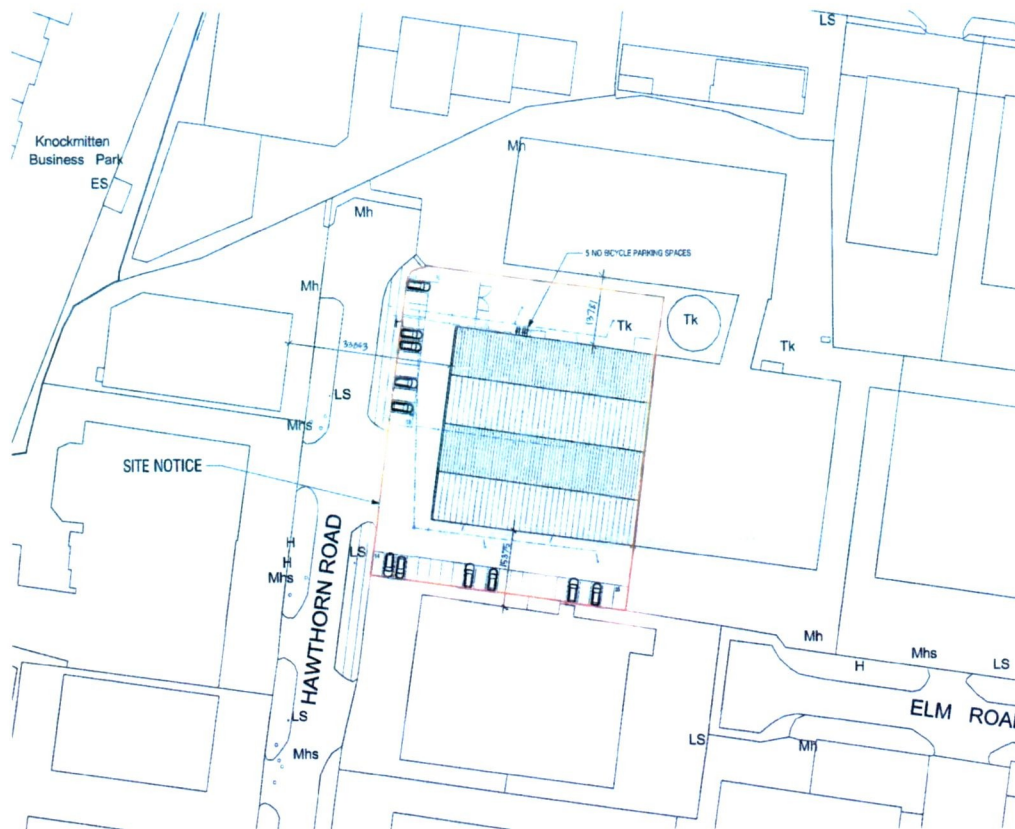


Figure 7: Extract of the Layout Plan of the development under Reg. Ref.: SD19A/023005

4.0 PROPOSED DEVELOPMENT

The proposed development will consist of the change of use of the existing building on the subject site (Knockmitten House).

The proposed development is described in the public notice as follows:

“The development will consist of the change of use of the existing building on site (comprising 763 sq.m gross floor area) from office use to light industrial use (comprising the assembly of hampers and online orders at first floor area, digital device repair and refurbishment at second floor level, with ancillary staff canteen and reception area at ground floor level). The development also includes the provision of a bicycle store (6 no. spaces) at ground / undercroft level, along with all ancillary works.”

The subject site is currently occupied by Knockmitten House, a three-storey commercial office building, with surface parking to the front in addition to an element of undercroft parking. The proposed use will comprise an ‘industry-light’ use as defined in the Development Plan for Knockmitten House over its three floors (with the ground floor to accommodate ancillary staff facilities and a reception area).

The first floor will accommodate rooms for the assembly of hampers and online orders, the second floor will accommodate rooms for digital device repair and refurbishment and the ground floor will accommodate staff canteen and reception area.

The proposed change of use will not result in any internal and / or external works on the Knockmitten House as it can be seen on the architectural drawings prepared by Ferreira Architects.

The proposed development includes the provision of a bicycle store that will comprise 6 no. spaces at ground / undercroft level.

The proposed use will not result in an increase in car parking requirements, as detailed below, therefore it is not proposed to increase the number of car parking spaces on site, which are adequate to provide for the use proposed.

No HGV movement will be required with the proposed use, only van and car movements will result from the proposed use (in keeping with the existing use on site and which can be accommodated within the existing parking and access arrangements for the existing building), therefore no hard landscaping works or alterations to the existing access arrangements for the building are required.

The nature of the proposed use for the existing building on site will not give rise to any amenity impact on the surrounding area, based on the absence of any external plant or heavy machinery to be used on site. The existing staff welfare and ancillary facilities within the building are also sufficient to meet the requirements of the proposed operator.

The intended operator of the development is Autofulfil Limited, a company within the same group of companies as the applicant (the applicant is the owner of the subject site). A brief brochure including imagery of other Autofulfil Limited operations of a similar sort elsewhere in Ireland is provided as Appendix 1 to this cover letter.

5.0 LOCAL PLANNING POLICY

South Dublin County Development 2022-2028

The application site is located within the administrative boundary of South Dublin County Council and is subject to the policies and objectives of the 2022 to 2028 South Dublin County Development Plan, which came into effect on the 3rd of August 2022.

Zoning

The application site is subject to the REGEN zoning objective with a stated objective “*To facilitate enterprise and/or residential-led regeneration subject to a development framework of plan for the area incorporating phasing and infrastructure delivery*” under the current County Development Plan.



Figure 8: Extract from Zoning Map 5 of South Dublin County Development Plan 2022-2028 (site outlined approximately in red)

Permitted in principle uses under the REGEN zoning applicable to the subject site include 'Industry-Light'. The proposed development therefore accords with the applicable zoning objective.

As noted previously, the applicant acknowledges and supports the regeneration of the area planned for under the current Development Plan, and the emerging planning policy context for the area (in particular the City Edge project). The current change of use proposal seeks to provide for a more efficient use of the existing building on site, pending the likely future regeneration of the subject site and the surrounding area.

Core Strategy and Settlement Strategy

Chapter 2 of the Development Plan sets out the strategy of the plan and supports the development of brownfield sites / infill and regeneration.

The vision of this chapter of the Development Plan is to *“Maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands.”*

Economic Development and Employment

Chapter 9 of the Development Plan relates to the economic development and employment policies of South Dublin County Council and provides policy support for development of the nature of that proposed on lands zoned REGEN.

Policy EDE1 is to *“Support sustainable enterprise and employment growth in South Dublin County recognising the County’s role in the Dublin region as a driver of economic growth.”*

EDE4 Objective 1 is *“To ensure that economic and employment development is located to optimise existing infrastructure and to support development and investment in the County’s urban centres supporting orderly growth and placemaking.”*

The existing site is currently underutilized, the proposed use will provide for improved utilization and efficiency of use of an existing building that will generate greater employment without impacting on the external appearance of the existing building on site.

Car and Bicycle parking standards

The Development Plan provides maximum car parking standards for employment uses in Table 12.25. The requirements for Offices (Including Office Based Industry, Science and Technology Based Enterprise, Business Park) and Manufacturing is 1 no. car parking spaces per 75sq.m of floorspace.

The requirement for the current use and the proposed use are the same, and there are 25 existing car parking spaces which is above the Development Plan requirement, therefore no change in car parking provision is proposed, and the existing provision is considered adequate to provide for the proposed change of use.

The development plan provides minimum bicycle parking / storage rates in Table 12.23. The requirement for Offices (Including Office Based Industry, Science and Technology Based Enterprise, Business Park) and Manufacturing is 1 no. short term and 1 no. long term bicycle parking space per 200sq.m of floorspace which results in a minimum of 4 no. bicycle parking spaces. It is proposed to provide 6 no. bicycle parking spaces on site.

Seveso Sites

3 Seveso Sites are located in the wider area surrounding the subject site.

2 no. Lower Tier Establishments are located within 1 km of the subject site: Kayfoam Woolfson, Bluebell Industrial Estate, Bluebell Avenue, Naas Road, Dublin 12 to the northeast and Irish Distillers Pernod Ricard, Robinhood Road, Fox & Geese, Clondalkin, Dublin 22 to the southeast.

1 no. Upper Tier Establishment is located within 2 km of the subject site: BOC Gases Ireland Ltd., PO Box 201, Bluebell, Dublin 12.

Based on a review of the Environmental Sensitivity Mapping tool (ESM), however, the subject site falls outside the defined consultation zones of any Seveso sites (see Figure 10 below).

The subject site is located in wider an area that comprises many commercial and industrial development and the proposed change of use is considered appropriate in this regard.

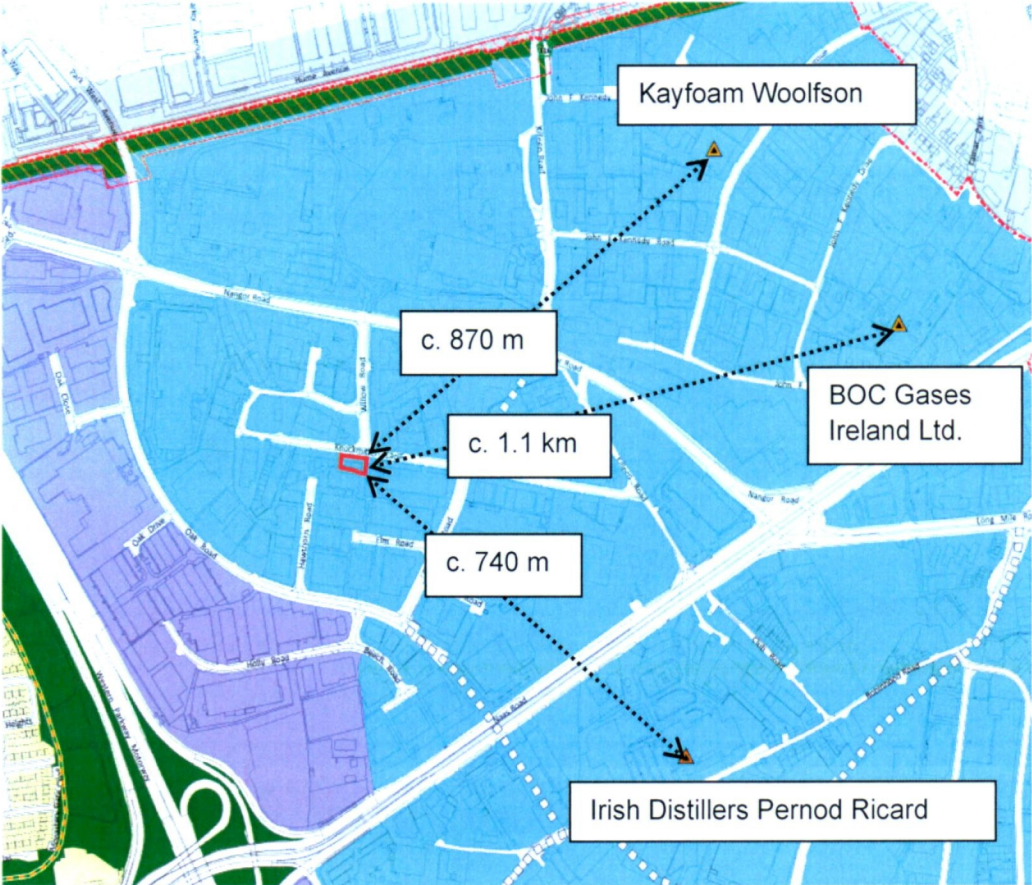


Figure 9: Map of Seveso sites in the surrounding area (extract from the Development Plan zoning map)



Figure 10: Extract from ESM mapping demonstrating the location of the site with regard to nearby Seveso sites

City Edge Strategic Framework 2022

The subject site is located within the City Edge Area, which is subject to a current masterplanning / plan making progress being progressed jointly by South Dublin County Council and Dublin City Council. While the City Edge project has not resulted in a statutory plan or draft plan at time of writing (it is understood the appropriate type of plan is currently being investigated), the following briefly summarises the context of the proposed development in light of the Strategic Framework published in August 2022.

A Strategic Framework for the future sustainable growth of the area has been prepared under Phase 1 of the City Edge Project. The purpose of the Strategic Framework is to set out a high-level approach and transformational trajectory for the regeneration of a new liveable, sustainable and climate resilient urban quarter.

The strategic plan states that *“City Edge currently plays a key role in the Dublin economy. The area occupies a strategic location in the city which, over time, has helped to create an important industrial and employment area. This role is expected to continue into the future.”*

The use proposed for the subject site is supported by the vision to *“create a resilient and diverse employment offer that is underpinned by high value employment opportunities within a re-imagined and re-purposed economy. The economic regeneration of City Edge will also incorporate a gradual transition towards urban industry and innovation.”*

The strategic plan sets out four key principles for the future economy of City Edge, listed as follows:

- **Growth:** economic growth through a range of measures such as creating high density employment and attracting high value sectors.
- **Opportunity:** re-purposing the economic structure of City Edge.
- **Diversification:** attract new and emerging sectors to complement existing valued industries.
- **Resilience:** responsive to changing economic conditions.”

The proposed change of use will result in a densification of employment as the subject site is currently underused while supporting urban industry development which is considered the key employment sector on the City Edge Project Strategic Framework.

New connections in the vicinity of the subject site are proposed to complete missing links and improve the permeability of the area. Moreover, a proposed outer orbital and proposed BusConnect (with the GDA strategy) are located in close proximity of the subject site to promote sustainable travels.

A local centre is proposed to the south of Knockmitten Lane within the framework strategy, located c. 200 m west from the subject site, and one is proposed to the west of Killeen Road, between the Grand Canal and the River Camac, on the BusConnects corridor, located c. 400 m north from the subject site.

Having regards to the City Edge Strategic Framework, the proposed development is considered appropriate for the subject location for the time being, and the applicant (as set out above) acknowledges and supports goals for the area set out in the Strategic Framework.

6.0 **CONCLUSION**

This planning application seeks to provide for the change of use of the existing building on site (comprising 763 sq.m gross floor area) from office use to light industrial use (comprising the assembly of hampers and online orders at first floor area, digital device repair and refurbishment at second floor level, with ancillary staff canteen and reception area at ground floor level), at Knockmitten House, Knockmitten Lane, Western Industrial Estate, Dublin 12.

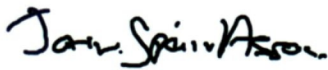
The planning application documentation has been prepared to meet with the requirements of the Planning and Development Regulations 2001-2022 and the South Dublin County Development Plan 2022-2028.

The proposed development is minor in nature and having regard to its nature, scale and its compliance with the relevant planning policy context, it is respectfully submitted that permission should be granted by the Planning Authority for the development proposal.

We trust that the information submitted is satisfactory. Please do not hesitate to contact us if you require any additional information or clarification on the documentation submitted.

If you require any further information, please do not hesitate to contact us.

Yours faithfully,



John Spain Associates

APPENDIX 1 – BROCHURE PREPARED BY THE INTENDED OCCUPIER