



**WRITTEN SUBMISSION TO THE FINGAL DRAFT DEVELOPMENT PLAN 2017-2023**

**Submitted to the Senior Executive Officer, Planning & Strategic Infrastructure Department, Fingal County Council, County Hall, Swords, Co. Dublin K67 X8Y2**

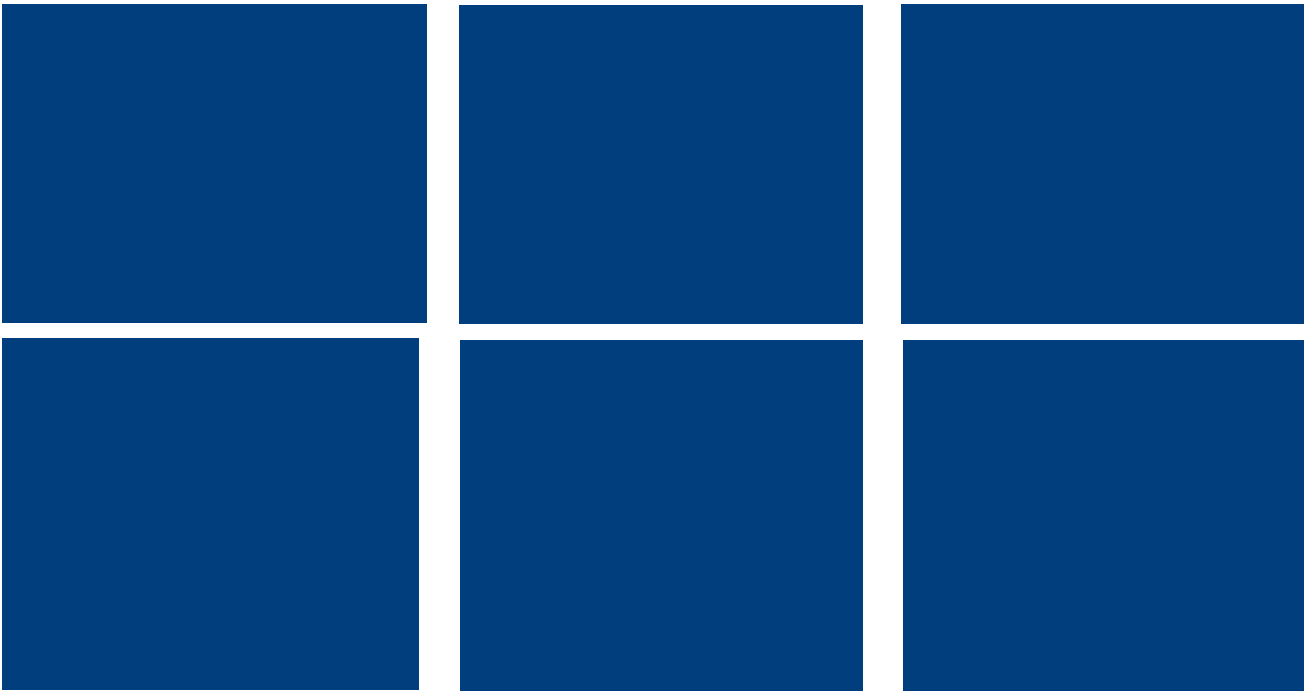
**RELATING TO THE REZONING OF LANDS AT NEWTOWN, KILSHANE CROSS, DUBLIN 11 FROM 'GB' GREENBELT TO 'WD' WAREHOUSING AND DISTRIBUTION**

**PREPARED ON BEHALF OF**

**Killeen Properties Limited, Lexus House, Killeen Road, Dublin 12**

**BY**

**RPS Group West Pier Business Campus, Dun Laoghaire, Co. Dublin**







**KILLEEN PROPERTIES LIMITED**

**SUBMISSION TO FINGAL DRAFT DEVELOPMENT PLAN 2017-2023  
RELATING TO LANDS AT NEWTOWN, KILSHANE CROSS, DUBLIN 11.**

**Submitted to the Senior Executive Officer, Planning & Strategic Infrastructure  
Department, Fingal County Council, County Hall, Swords, Co. Dublin K67 X8Y2**

# Document Control Sheet

Client:	Killeen Properties Limited, Lexus House, Killeen Road, Dublin 12		
Project Title:	Submission to Fingal Draft Development Plan 2017-2023		
Document Title:	Submission to Fingal Draft Development Plan 2017-2023		
Document No:	MH16007_Kilshane Cross		
Text Pages:	36	Appendices:	0

Rev.	Status	Date	Author(s)		Reviewed By		Approved By	
F01	Final	28 <sup>th</sup> April 2016	LC	<i>Rita Conolly</i>	PS	<i>Patricia Slawny</i>	LK	<i>L. Conolly</i>

Copyright RPS Group Limited. All rights reserved.

The report has been prepared for the exclusive use of our client and unless otherwise agreed in writing by RPS Group Limited no other party may use, make use of or rely on the contents of this report.

The report has been compiled using the resources agreed with the client and in accordance with the scope of work agreed with the client. No liability is accepted by RPS Group Limited for any use of this report, other than the purpose for which it was prepared.

RPS Group Limited accepts no responsibility for any documents or information supplied to RPS Group Limited by others and no legal liability arising from the use by others of opinions or data contained in this report. It is expressly stated that no independent verification of any documents or information supplied by others has been made.

RPS Group Limited has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report's accuracy.

No part of this report may be copied or reproduced, by any means, without the written permission of RPS Group Limited



## TABLE OF CONTENTS

<b>EXECUTIVE SUMMARY .....</b>	<b>III</b>
<b>1 INTRODUCTION.....</b>	<b>1</b>
<b>2 KILLEEN PROPERTIES LIMITED.....</b>	<b>2</b>
2.1 KILLEEN’S DISTRIBUTION AND LOGISTICS ACTIVITIES.....	2
2.2 SITE REQUIREMENTS.....	4
2.3 CONCLUSION.....	5
2.4 KILLEEN AND FINGAL.....	9
2.4.1 Submission on Draft Fingal Development Plan 2011-2017.....	9
2.4.2 Submission on Issues Paper <i>Draft Fingal Development Plan 2017 – 2022</i> .....	9
<b>3 LANDS TO WHICH THIS SUBMISSION RELATES.....</b>	<b>10</b>
3.1 LOCATION OF SUBJECT LANDS.....	10
3.2 PLANNING HISTORY .....	13
3.2.1 Subject Lands.....	13
3.2.2 Significant Planning History on Neighbouring Lands.....	13
3.3 SUMMARY .....	14
<b>4 EXISTING AND PROPOSED PLANNING CONTEXT AND ZONING .....</b>	<b>15</b>
4.1 FINGAL COUNTY DEVELOPMENT PLAN 2011-2017 .....	15
4.1.1 Overall Strategy.....	15
4.1.2 Subject Lands.....	16
4.2 DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023 .....	18
4.2.1 Overall Strategy.....	18
4.2.2 Subject Lands.....	20
4.3 COMMENTARY ON EXISTING AND PROPOSED ZONING .....	22
<b>5 PROPOSED REZONING OF THE SUBJECT LANDS TO ‘WD’ .....</b>	<b>25</b>
5.1 RELEVANT CONSIDERATIONS .....	27
5.1.1 Audit of ‘WD’ Zoned Lands in Draft Fingal Development Plan 2017-2023 .....	27
5.1.2 Road Capacity.....	30
5.1.3 Access .....	31
5.1.4 Safety Considerations.....	32
5.2 SUMMARY.....	33
5.3 OBSERVATIONS ON ‘GB’ ZONING.....	34

5.3.1 GB Zoning Objective for the Subject Lands .....	34
<b>6 CONCLUSIONS.....</b>	<b>36</b>

## LIST OF FIGURES

Figure 2.1 The Constrained Site Layout and Context of Killeen Road Compared to a Similar Operation on a Greenfield Site .....	4
Figure 2.2 Existing Conceptual Transport Plan .....	7
Figure 2.3 Proposed Conceptual Transport Plan .....	8
Figure 3.1 Location of Subject Lands (outlined in red) .....	10
Figure 3.2 View of the Western Boundary of the Subject Lands (right) from the R135 which includes a Shared Footpath and Cycleway and Bus Eireann Bus Stop along the R135 .....	11
Figure 3.3 View of the Subject Lands (right) between the R135 and Elm Road .....	11
Figure 3.4 View of the Southern Boundary of the Subject Lands (left) at the Roundabout providing Southbound Access onto the N2 and Access to Elm Road and the Dublin Airport Logistics Park with Security Hut (right).....	12
Figure 3.5 Aerial View of Established Commercial Enterprises to the North of the Subject Lands and North of the R108 (including TJ O'Mahony and Blue Steel Stockholders) .....	12
Figure 3.6 The Dublin Airport Logistics Park (as Originally Proposed and as Currently Built Out) .....	14
Figure 4.1 Location of Subject Lands in Current Fingal Development Plan 2011-2017 .....	18
Figure 4.2 Location of Subject Lands in Draft Fingal Development Plan 2017-2023 .....	21
Figure 4.3 The Subject Lands in the Context of Proposed Zoning Changes under Draft Fingal Development Plan 2017-2023 .....	24
Figure 5.1 Quantum of Zoned Employment Generating Land (2016) .....	27
Figure 5.2 Quantum of Zoned Employment Generating Land (2011) .....	28
Figure 5.3 Location of Sites Zoned 'WD' under the Draft Fingal Development Plan 2017-2023 .....	28
Figure 5.4 Extract from Draft Fingal Development Plan 2017-2023 - Zoning Map Sheet Nos. 11 & 12 .....	29
Figure 5.5 Proposed Access Arrangements for Site.....	31

## LIST OF TABLES

Table 4.1 Relevant Land Use Zoning Objectives .....	22
Table 5.1 - Consideration of the 'WD' Zoning Objective and the Subject Lands .....	26
Table 5.2 - Consideration of related 'WD' Policy Objectives and the Subject Lands.....	26
Table 5.3 - Consideration of GB Zoning Objective and the Subject Lands.....	35

## EXECUTIVE SUMMARY

Killeen Properties Limited is part of the Killeen Group which also owns and operates the Toyota and Lexus franchises for Ireland. The Group was established in 1974 when the late Dr. Tim Mahony secured the Toyota franchise. Over the years Toyota and the Mahony Family have been intrinsically associated with *inter alia* the development and ownership of quality hotel and golf resorts such as Mount Juliet and Fota Island.

The Killeen Group is an established, experienced operator in the field of vehicle importation, wholesale and distribution throughout Ireland. The distribution of newly imported vehicles from Dublin Port and their subsequent dispatch to Killeen's two separate holding/distribution sites at Killeen Road, Dublin 12 and Kylemore Road, Dublin 12 takes place on a daily basis.

In 2000/2001, Killeen purchased approximately 32 acres (13 ha) of lands at Newtown, Kilshane Cross, Dublin 11 (these lands are the subject of this submission). It is Killeen's long term objective to relocate and consolidate its distribution operations to one strategic location. In our client's opinion the subject lands at Kilshane Cross are ideally located for its distribution and logistics activity (comprising the storage and preparation of Toyota/Lexus motor vehicles prior to distribution nationwide). In this regard, this type of facility needs to be strategically located relative to the wider national road network. Proximity to Dublin Port, the Port Tunnel and the M50 are also of particular relevance. The subject lands are located approximately 20km from Dublin Port. This is closer than the sites which Killeen currently operates from (which are approximately 30km from the Port). In this regard, the efficiency gains in terms of accessibility and distance are clearly evident.

**The purpose of this submission is to seek the rezoning of the subject lands at Newtown, Kilshane Cross from 'GB-Greenbelt' to 'WD-Warehousing and Distribution'.** With specific reference to 'distribution', 'logistics' and the requirement for 'good access to a major road network', the 'WD' zoning objective is considered the most compatible land use zoning objective with the operational requirements of Killeen.

### Rationale for Rezoning of Lands:

- The lands are bounded by a quality road network, are immediately accessible to the national road network and are located approximately 10km from the northbound exit of the Port Tunnel. Furthermore, significant investment has been made to the infrastructure immediately adjacent to the subject site (in particular the roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park). The immediate accessibility of the lands to the national road network, the investment in road infrastructure in the area and the potential to cluster logistics / distribution / wholesale uses in this area is a clear indication of the sustainable development potential of the lands.
- Rezoning the subject lands to 'WD' would be a natural and logical extension to the established 'WD' land use zoning objective adjoining and immediately to the south of the subject lands (i.e., the northern portion of the Dublin Airport Logistics Park where DHL and Eason & Sons are located). Additional low intensity economic development to the Newtown

Road would be an appropriate and gradual transition between land uses, from the extensive and more intensive GE zoning to the south to GB to the north of Newtown Road.

- Killeen's proposed use for the subject lands for the storage of vehicles and the preparation of vehicles for distribution to dealerships in Ireland is consistent with similar uses Permitted in Principle under the 'WD' land use zoning objective including: Cargo Yards, Heavy Vehicle Park, Logistics, Office ancillary to permitted use, Road Transport Depot, and Vehicle Servicing/Maintenance Garage. The proposed use is also consistent with the established distributions/logistics warehousing adjoining and immediately south of the lands. It is further noted that lands on the Western Campus of Dublin Airport (to the north west of the subject lands) have been identified in the Dublin Airport LAP for Ancillary Related Airside Services which includes *inter alia* long-stay parking, taxi, feeder park, car hire, staff parking, logistics, and aviation related light industrial uses. These types of uses are also consistent with the nature of activities associated with the storage, preparation and distribution of vehicles as envisaged by Killeen for the subject lands.
- As referred to above, the 'WD' zoning objective is considered the most compatible land use zoning objective with the operational requirements of Killeen. WD zoning has the smallest quantum of land zoned for economic development in the Draft Plan (approx. 21.9ha). It is also concentrated at just two locations within the County. The first is located in the Dublin Airport Logistics Park immediately adjoining the subject lands to the south. The second is located in North Point Business Park off Junction 4 of the M50. Only 12.5ha of the 'WD' zoned land is undeveloped and is not suitable for Killeen's intended use having regard to site size and other specific site requirements.

From a county-wide land use zoning perspective it is considered appropriate and prudent to zone additional land 'WD' in the final Plan. Having regard to the immediate accessibility of the subject lands at Newtown, Kilshane Cross to the national road network, the investment in road infrastructure in the area and the potential to cluster logistics / distribution / wholesale uses at this location, it is considered that extending the existing 'WD' land use zoning objective of adjoining lands to the immediate south (i.e., the northern portion of the Airport Logistics Park where DHL and Eason & Sons are located) northwards to include the subject lands would be natural and logical from a land use planning perspective. It is also considered appropriate having regard to the following policy objectives:

**Objective ED01** *Ensure that there is a sufficient quantum of zoned lands to facilitate a range of enterprise development and a mix of employment creation across all business and industry sectors within Fingal.*

**Objective ED10** *Maximise sustainable economic opportunities associated with the presence of key infrastructural assets within the County including Dublin Airport, the national motorway network, railway services, and the close proximity to Dublin City and Dublin Port via the Port Tunnel*

- Finally, it is considered that the lands do not constitute an active greenbelt buffer zone at this location. In this regard, there is a large established commercial enterprise in the form of a builder's yard and Blue Steel Stockholders Ltd. already within the Greenbelt zoning to the north of the R135. Furthermore, the roads defining the boundaries of the lands to the north, south and west are intensively used by commercial traffic – in particular HGV's and

logistics/distribution vehicles, including those associated with tenants of the Dublin Airport Logistics Park.

It is further submitted that the lands do not contribute to the demarcation of an edge between a rural and an urban area or between two urban areas; are not designated with any environmental designation; do not safeguard the setting, special character of a historical landscape and are not publically accessible (or indeed suitable) for recreational or active use. Accordingly, it is submitted development of these lands for an appropriate use therefore would not undermine the integrity of the Greenbelt.

In terms of proximity to the airport, and potential issues arising, the following is considered relevant:

- The inner public safety zone associated with Dublin Airport's east-west runway affects only a small portion of the site stretching east along the Newtown Road. The safety zone sets a logical boundary to development north of the Newtown Road.
- The site is within the outer public safety zone and the Inner Airport Noise Zone. Development is not prohibited within these zones, subject to consultation with the Irish Aviation Authority on land use density (public safety) and noise sensitivity. It is a type of development, similar to airside services at the airport, which will not impact on the safety of aircraft or the safe and efficient navigation thereof.

In conclusion, this rezoning submission is by an established business wishing to relocate and consolidate its distribution operations to one strategic location. The commercial purchase of the site in 2000/2001 provides clear bona fides of the long-term strategic investment being undertaken by Killeen. In this regard, the intended use of the subject lands is not speculative but rather is an intrinsic part of a well thought out business case.

It is submitted that the long term use of the lands is for a very specific 'end user' purpose and one which is consistent with established adjoining uses or uses 'Permitted in Principle' in adjoining 'WD' lands.

It is also submitted that the existing Killeen sites at Killeen Road and Kylemore Road are inefficient and unsustainable in terms of current operations and the relocation of the use to a more environmentally sustainable site for distribution/logistic activities fully accords with the proper planning and sustainable development of the overall GDA.

Finally, it is submitted that the proposed rezoning of the subject lands to 'WD' is consistent with the proper planning and sustainable development of the area.



# 1 INTRODUCTION

RPS Group, West Pier Business Campus, Dun Laoghaire, Co. Dublin has been instructed by Killeen Properties Limited, Lexus House, Killeen Road, Dublin 12 to lodge this submission in respect of *Draft Fingal Development Plan 2017-2023* (herein referred to as the 'Draft Plan') which was published by Fingal County Council on the 19<sup>th</sup> February 2016.

Our client welcomes the publication of the Draft Plan and the public invitation for submissions. This submission has been prepared pursuant to this invitation, and we request that Fingal County Council takes its content into consideration in the finalisation of the amended Plan.

As specified in the public notice dated 19<sup>th</sup> February 2016, this submission is addressed to the **Senior Executive Officer, Planning & Strategic Infrastructure Department, Fingal County Council, County Hall, Swords, Co. Dublin K67 X8Y2.**

The purpose of this submission is to seek the rezoning of approximately 32 acres (13 ha) of lands at Newtown, Kilshane Cross, Dublin 11 from 'GB-Greenbelt' to 'WD-Warehousing and Distribution' zoning and comment on a number of matters of detail within the Draft Plan. Our client would welcome the opportunity to give any further information or detail in respect of this submission.

This submission relates to our clients lands at Newtown, Kishane Cross, Dublin 11. We respectfully refer Fingal County Council to the fact that our client has also made a separate submission relating to lands in their ownership at Lissenhall, Sword, Co. Dublin (the submission is clearly marked as relating to the aforementioned lands).

This submission is laid out in a number of sections as follows:

**Section 2** provides detail on Killeen Properties Limited and its logistic/distribution operations and provides background to the submission;

**Section 3** provides details relating to the lands to which this submission relates i.e., lands at Newtown, Kilshane Cross, Dublin 11;

**Section 4** presents commentary on the existing and statutory Development Plan, the Draft Plan as well as the policies and objectives set out therein insofar as they relate to our client's lands;

**Section 5** outlines the case for rezoning the subject lands to 'WD-Warehousing and Distribution' and their suitability for Killeen's operational requirements as its new logistics/distributions centre; and

**Section 6** sets out the conclusions and recommendations which our client would submit should be taken into account in the amended Plan in respect of the subject lands.

## 2 KILLEEN PROPERTIES LIMITED

Killeen Properties Limited is part of the Killeen Group which also owns and operates the Toyota and Lexus franchises for Ireland. The Group was established in 1974 when the late Dr Tim Mahony secured the Toyota franchise. The company and brand was transformed from the smallest of players in the Irish market in the mid-1970s to a consistent market leader over the last 30 years. Being owned by the Mahony family, it is currently one of the few locally owned motor distributors which still exist in Ireland.

Toyota Ireland also has the Irish distribution rights for warehouse equipment and forklifts sold under the Toyota and BT brands. Over the years Toyota and the Mahony Family have been intrinsically associated with their active sponsorship of the Irish language, the GAA, the Munster Rugby Team, the Irish Cricket Team, the National Youth Orchestra and their development and ownership of quality hotel and golf resorts such as Mount Juliet and Fota Island.

For ease of reference Killeen Properties Limited is referenced as Killeen within this document.

### 2.1 KILLEEN'S DISTRIBUTION AND LOGISTICS ACTIVITIES

Killeen is an established, experienced operator in the field of vehicle importation, wholesale and distribution throughout the Country. The distribution of newly imported vehicles from Dublin Port and their subsequent dispatch to Killeen's two separate holding/distribution sites at Killeen Road, Dublin 12 and Kylemore Road, Dublin 12 takes place on a daily basis. All operations are professionally managed by a logistics team.

It is submitted that on average approximately 400 trips transporting 1,700 no. vehicles from Dublin Port are made each month; a similar number of trips are made distributing the vehicles on to dealerships nationwide.

By way of background, a summary of the activities currently carried out to and from, and within the Killeen Road and Kylemore Road sites, is set out below. The stages are numbered and graphically presented in **Figure 2.2** and **Figure 2.3**.

- (1) Vehicles are transported to Dublin Port by ship on a daily basis. On average there are approximately 22 no. deliveries per month.
- (2) (3) Vehicles are off loaded and stored temporarily at designated compounds at Dublin Port.
- (4) Vehicles are loaded onto trucks for transportation to Killeen's facilities at Killeen Road and Kylemore Road.
  - 3-5 no. trucks operate from Dublin Port (depending on the demand/peak sales season) with approximately three loads a day. A maximum of nine cars can be transported on each truck.
  - The trucks currently utilise the Port Tunnel and the M50.
- (5) (6) At Killeen Road the vehicles are prepared on site for dispatch based on specific dealership needs and stock requirements. In general this includes vehicle preparation such as the addition of licence plates etc. Vehicles stored at Kylemore Road must be brought to Killeen Road for such works. There is constant, evolving storage and distribution activity between both sites.

- (7) Vehicles are then distributed by truck directly to dealerships throughout the Country.
- During peak vehicle sales periods (from November-January) distribution activity takes place on a 24 hour basis. Drivers work on a shift basis during this time.
  - There are approximately 30-40 no. full-time staff employed in this process including administrative staff, Killeen Road compound staff, security staff, port staff and drivers.
  - The combined capacity at the Killeen Road and Kylemore Road sites is approximately 4,500 no. vehicles (approximately 2,400 no. at Kylemore Road and 2,100 no. at Killeen Road).

It is noted that for every 100 no. truckloads of vehicles taken from Dublin Port and transported to Killeen's base in Killeen Road and Kylemore Road, approximately 60 no. loads are subsequently distributed to dealerships in the south, east and west of Ireland and approximately 30 no. loads are subsequently distributed to dealerships in the north/west of Ireland. Approximately 5-10 no. truckloads are distributed to Dublin based dealerships.

The activities outlined above should be read in conjunction with **Figure 2.2** entitled 'Existing Conceptual Transport Plan'.

There are a number of operational constraints for Killeen arising from the location and nature of its separate holding/distribution sites at Killeen Road and Kylemore Road. These are:

- The location of both sites i.e., distance from Dublin Port;
- The separate locations and site configurations/layouts causes duplication of work practices between the two sites and this effects efficiency. A practical example is the extra time and potential damage to vehicles arising in staff retrieving vehicles which are parked tightly together in order to fill a specific dealership order;
- The size of the sites and lack of availability of adjoining lands to consolidate and/or extend into;
- Existing and growing demand on the local road network particularly the Long Mile Road and at the M50/M7 junction;
- The impact of existing activities adjoining the storage facilities (including number and nature of accesses to other businesses and onto the road network);
- The nature of existing uses and security issues arising; and
- Flood risk factors: The Camac River flows through the site at Killeen Road. It has flooded in recent years resulting in damage/loss of stock and associated operational delays for the business.

These constraints are well illustrated by comparing the Killeen Road context and site configuration with that of a purpose built facility at Baldonnel owned and operated by an independent vehicle transportation company. In addition to immediate proximity to the M7, the availability of land at the Baldonnel facility enables efficient and effective circulation and storage arrangements for vehicles and ancillary activities. The ability to provide appropriate/efficient layouts including loading and unloading areas and circulation/parking arrangements means that cars can be parked in a particular way for ease of access to specific vehicle models. See **Figure 2.1**.



**Figure 2.1 The Constrained Site Layout and Context of Killeen Road Compared to a Similar Operation on a Greenfield Site**

In consideration of the future direction of the business in Ireland, Killeen has noted and taken on board the day-to-day operational experiences and constraints experienced by their logistics/distribution staff. This information has been key in formulating their long-term vision for the company and the critical need to consolidate and relocate the storage and distribution element of the business.

## 2.2 SITE REQUIREMENTS

Our client can confirm that from a business perspective the optimal solution for the storage, preparation of vehicles for dispatch and efficient distribution of motor vehicles to dealerships is from **one single location within close proximity to Dublin Port, the Port Tunnel and with good linkages to the National Road Network (including the M50)**. We would refer to **Figure 2.3 'Proposed Conceptual Transport Plan'** which shows Killeen's distribution activities if relocated to the lands at Newtown, Kilshane Cross. It is noteworthy that the lands which are the subject of this submission are located approximately 20km from Dublin Port. This is closer than the sites which Killeen currently operate from (which are approximately 30km from the Port). In this regard, the efficiency gains in terms of accessibility and distance are clearly evident.

The optimal site scenario from an operational perspective can be summarised as follows:

- A suitable quantum of land in order to provide secure parking/storage area for vehicles to cater for existing and future operational needs with a capacity to accommodate approximately 6,000-8,000 no. vehicles;
- The ability to provide appropriate/efficient layouts including loading and unloading areas and circulation/parking arrangements so that vehicles can be parked in a particular way for ease of access to specific vehicle models in order to fill orders from dealerships promptly;
- Site surfaces that will not cause damage to the vehicles;
- The availability of space for associated ancillary structures/buildings including administrative offices (of a modest scale), appropriate facilities for staff, security hut/offices, vehicle preparation facilities and modest storage facilities for materials (car mats etc.) associated with the operations onsite;
- The ability to secure the site by means of boundary treatment and landscaping measures; and
- Adjoining land uses which will not impact on the day-to-day operations.

In terms of sustainable land use, we would make the following observations about the lands and development potential of the lands at Newtown, Kilshane Cross.

- **Services:** The subject site is located proximate to existing electricity, water and foul networks.
- **Sustainable Site Infrastructure:** Killeen can confirm that their proposals for the subject site will implement the highest environmental standards and best practice including the SuDS hierarchy as set out in the GSDSDS.
- **Road Infrastructure:** The site is bounded by the R108, R135, Kilshane Cross and a roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park. These are roads intensively used by commercial traffic – in particular HGV's and logistics/distribution vehicles, including those associated with tenants of the Dublin Airport Logistics Park. Refer to **Section 3.0**.
- **Sustainable transportation considerations:** The subject lands are bounded to the west by the R135 Regional Road which includes a shared footpath and cycleway. A Bus Éireann bus stop and associated layby is located along the boundary of the site, c. 200m to the south of Kilshane Cross.

In summary, it is submitted that the subject lands present an opportunity to establish 'best practice' for a planned 'end user' distributor/logistics facility for Killeen.

## 2.3 CONCLUSION

In summary, Killeen has undertaken a review of their existing distribution operations, storage facilities and site arrangements; the outcome of which concluded that from a day-to-day operational

perspective the long term use of the two separate sites at Killeen Road and Kylemore Road is not effective, efficient or sustainable and is not conducive to servicing current operations or facilitating future growth of this aspect of the business.

It is further submitted that there are significant sustainability benefits arising from the relocation of Killeen's distribution operations to a more appropriately located and configured site including *inter alia* reduction in mileage and congestion costs, and freeing up land from an unsuitable use for a more sustainable form of urban development over the long term.



Figure 2.2 Existing Conceptual Transport Plan



Figure 2.3 Proposed Conceptual Transport Plan



## 2.4 KILLEEN AND FINGAL

In 2000/2001, Killeen purchased the lands at Newtown, Kilshane Cross, Dublin 11, which are the subject of this submission. The lands equate to approximately 32 acres (13ha). Our client considers that the subject lands are key to its long term business operations in Ireland.

The rezoning of the lands to a 'WD-Warehouse and Distribution' land use zoning objective would facilitate the relocation and consolidation of Killeen's distribution operations to one strategic location. The subject lands at Kilshane Cross are considered by our client to be strategically located and exemplar in this regard. The particular benefits of the site are set out in **Section 5** of this document.

### 2.4.1 Submission on Draft Fingal Development Plan 2011-2017

In June 2010, a submission was made on the *Draft Fingal Development Plan 2011-2017* on behalf of Killeen Properties Ltd. While it was considered that the 'GB' zoning objective for the site was not envisaged for the long term, no change was made at that time.

### 2.4.2 Submission on Issues Paper *Draft Fingal Development Plan 2017 – 2022*

In May 2015, a submission was made on the Strategic Issues Paper of the *Draft Fingal Development Plan 2017 – 2022* by Stephen Little Associates on behalf of Killeen. In the context of focussing on strategic issues, the submission asked the Planning Authority to consider the development potential of lands adjoining employment zones south of Dublin Airport and north of the City boundary.

In particular, the submission noted that: *"there are identifiable lands zoned 'GB' Greenbelt adjoining the employment zone, that no longer function to sustain agricultural use or rural activities, to provide meaningful separation between built up/developed areas, or to provide recreational amenities. Where these lands are not constrained by the Inner Safety Zone of Dublin Airport they could be argued to have development potential that is not being realised and which could make a valuable contribution to economic recovery and job creation within Fingal"*.

### 3 LANDS TO WHICH THIS SUBMISSION RELATES

#### 3.1 LOCATION OF SUBJECT LANDS

The lands which are the subject of this submission are situated at Newtown, Kilshane Cross, Dublin 11. They are located approximately 5km to the west of Dublin Airport and 2km to the north of the M50 Motorway. The lands are located off the N2 National Primary Road at its junction with the R135 Regional Road (see **Figure 3.1**).



**Figure 3.1 Location of Subject Lands (outlined in red)**

To the north, the lands are bounded by a local road connecting the R108 at Cradden's Leap Roundabout to the R135 at Kilshane Cross. Currently, the primary access to the lands is at an entrance located c. 300m to the east of Newtown, Kilshane Cross. TJ O'Mahony builder's providers and Blue Steel Stockholders Ltd. are located to the north of the road with an entrance located c. 75m to the east of Kilshane Cross.

The lands are bounded to the east by a c. 34.6ha site which is currently used for agriculture. This large parcel of land is accessed via the local road to the north and by the R112 further to the east.

To the south, the lands are bounded by the R135 and a roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park. The south eastern portion of the lands are bounded by a c. 4.8ha greenfield site which is located within the Dublin Airport Logistics Park (this site which is zoned 'WD-Warehousing and Distribution' is located immediately adjacent to DHL's Distribution Centre (refer to **Section 5.1.1**).

The subject lands are bounded to the west by the R135 Regional Road which includes a shared footpath and cycleway separated from the R135 by a grass verge. A Bus Éireann bus stop and associated layby is located on the west side of this road, c. 200m to the south of Kilshane Cross. To

the east of the R135 are two dwellings and their attendant grounds which comprise outbuildings, open grassland and mature trees and vegetation.

The lands are used for agriculture and are divided by a mature hedgerow into two main fields. The Finglas-Glasmore No. 2 110kV overhead line runs through the site in a north/south direction with a pole located in the approximate centre of the lands. A second overhead line runs through the site in an east/west direction.

In the north western corner of the lands is a single storey dwelling on a plot of c. 0.2ha. The eastern edge of this plot approximately follows the line of a stream which runs north and feeds into the Ward River at Tyrellstown (c. 3.8km to the north). In the north eastern corner of the subject lands, there is a plot of undeveloped scrubland measuring c.0.5ha. The main access to the subject lands are also located at this point.



**Figure 3.2 View of the Western Boundary of the Subject Lands (right) from the R135 which includes a Shared Footpath and Cycleway and Bus Eireann Bus Stop along the R135**



**Figure 3.3 View of the Subject Lands (right) between the R135 and Elm Road**



**Figure 3.4 View of the Southern Boundary of the Subject Lands (left) at the Roundabout providing Southbound Access onto the N2 and Access to Elm Road and the Dublin Airport Logistics Park with Security Hut (right)**



**Figure 3.5 Aerial View of Established Commercial Enterprises to the North of the Subject Lands and North of the R108 (including TJ O'Mahony and Blue Steel Stockholders)**

## 3.2 PLANNING HISTORY

### 3.2.1 Subject Lands

The subject lands are in agricultural use and have limited planning history. The existing planning history relates to overhead electrical lines as follows:

On 21<sup>st</sup> April 1998, Fingal County Council granted planning permission under **Reg. Ref.: F98A/0018** for an overhead electricity line of single circuit 110kV construction (the Finglas-Glasmore No. 2 110kV Line). The line consists of three overhead wires supported on double wood pole structures, whose poles are 5m apart, and of an average height of 20m. It is noted that one of these supporting wood poles is located on the subject lands.

On 14<sup>th</sup> August 2002, Fingal County Council granted planning permission under **Reg. Ref.: F02A/0542** to alter/divert the Finglas-Glasmore No. 2 110kV Line in the vicinity of Coldwinters, Finglas. Permission was granted to move the existing line an average of 30m to the east of its location and to construct three new lattice steel angle towers and six new double wood poles structures.

### 3.2.2 Significant Planning History on Neighbouring Lands

There is relevant planning history for the adjoining lands to the south-east. It relates to development which is broadly comparable with Killeen's intentions for its lands. In this regard, it is the parent planning permissions relating to the Dublin Airport Logistics Park.

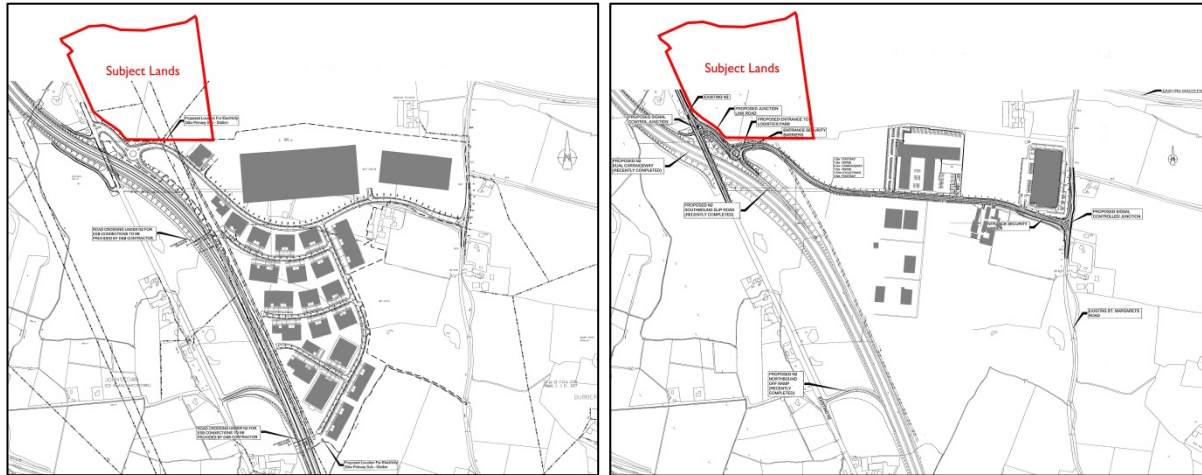
On 3rd August 2005, planning permission was granted under **F05A/0582** for site development works, services and ancillary buildings for a proposed logistics and warehousing park on a site of 49.36 hectares. The service requirements for this site were based on a total floor area of 155,000 sqm. Planning permission was granted for vehicular access via T-junctions onto the N2 National Primary Road and R122 St. Margaret's Road and included the provision of a roundabout at the junction of the southbound slip road onto the N2. The development included: the demolition of an existing habitable dwelling on St. Margaret's Road and an existing Open Golf Centre Clubhouse and Driving Range Buildings; provision of internal road system and footpaths; surface water drain gauge including attenuation ponds and underground storage system; sewage collection system including pumping station and rising main; connection to the existing watermains gas electrical and telecoms networks; and installation of ESB substations.

On 16<sup>th</sup> January 2006, Fingal County Council granted planning permission for a western access roadway to the proposed logistics and warehousing park approved under planning reference **F05A/0582**. The development would include a T-junction onto the existing N2, the widening of the proposed southbound slip road onto the N2, the provision of a roundabout on the slip road and the extension of internal Spine Road A westwards for a distance of 220m to the proposed roundabout. The development would also include the provision of verges, footpaths and cycle tracks, retaining wall, surface water drainage, landscaping, road lighting, traffic signage and the extension of watermains, gas mains and telecommunications ducting to the existing N2. Security barriers and an associated security hut would be provided on the extension to Spine Road A at the entrance to the development site

It is noted that there is a current (undetermined) planning application (Reg. Ref. F16A/0128) which was submitted to Fingal County Council on 30<sup>th</sup> March 2016 relating to the Dublin Airport Logistics

Park which seeks four additional single storey industrial/warehouse units and ancillary elements. The proposed units are located to the south of the existing internal road within the logistics park (known as Elm Road) and to the east and west of the existing warehouse building occupied by Frank Flanagan Fittings.

**Figure 3.6** illustrates the layout of F05A/0582 which identifies the Dublin Airport Logistics Park layout as originally proposed and as currently built out, including the DHL Express and Eason and Son Ltd buildings. The subject lands are highlighted to the immediate north adjacent to the new road infrastructure.



**Figure 3.6 The Dublin Airport Logistics Park (as Originally Proposed and as Currently Built Out)**

### 3.3 SUMMARY

The subject lands are strategically located relative to the wider national road network (including the Port Tunnel and the M50). Other important considerations include:

- The subject lands are bounded to the west by the R135 and a roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park.
- The south-eastern portion of the lands are bounded by the Dublin Airport Logistics Park which is zoned 'WD–Warehousing and Distribution' and includes DHL's Distribution Centre and Eason & Sons.
- The subject lands are served by a shared footpath and cycleway (located on the R135 along the western boundary of the lands). A Bus Éireann bus stop and associated layby is also located on this road along the western boundary of the site, c. 200m to the south of Kilshane Cross.

## 4 EXISTING AND PROPOSED PLANNING CONTEXT AND ZONING

### 4.1 FINGAL COUNTY DEVELOPMENT PLAN 2011-2017

#### 4.1.1 Overall Strategy

The current *Fingal County Development Plan 2011-2017* (the 'CDP') includes a number of references to the strategic advantages of Fingal in terms of accessibility to national and international markets. These are of particular relevance to Killeen choosing Fingal as the base for its future distribution operations.

In Chapter 2 on 'Enterprise and Employment', in Section 2.1 entitled 'Background' the following statement is made "*Fingal has many strategic advantages including the presence of Dublin Airport which, in conjunction with its **access to Dublin Port** and rail, **road** and telecommunications infrastructure, **gives Fingal ready access to national and international markets***" (our emphasis).

In Section 2.11, in relation to 'Ports, Marinas and Jetties, it is stated "***Port services are critically important for enterprise, handling 99% of Ireland's trade or 75% percent in value terms (Forfás 2009). The principal issues effecting ports are efficiency and operational issues, specifically adequacy of internal road and rail access and the provision of deeper water facilities. Fingal benefits from excellent access to Dublin Port via the Port Tunnel***" (our emphasis).

The CDP includes other policies and objectives of relevance to the decision of Killeen to relocate its distribution operations to Fingal and seek the rezoning of the subject lands at Kilshane Cross. These include the following statements and objectives within Chapter 2 entitled Enterprise and Employment as follows:

- **Section 2.1 Statement of Policy:** "*Facilitate economic growth through the consolidation of existing industrial and commercial areas and by ensuring that adequate and suitably located serviced land is available at appropriate locations throughout the County*"
- **Objective EE02** which sets out that it is an objective to "*Collaborate with the three other Dublin Local Authorities to promote the competitiveness, prosperity and sustainable development of the Dublin City Region*".
- **Objective EE07** which sets out that it is an objective to: "*Encourage developments which are likely to generate significant levels of freight traffic to locate close to the existing County or national road network having regard to NRA policy*".
- **Objective EE09** which sets out that it is an objective to: "*Promote innovative economic sectors and encourage clustering which exploits links between interconnected companies and/or with third level educational institutions*".
- **Objective EE59** which sets out that it is an objective to "*Continue to take account of the advice of the Irish Aviation Authority with regard to the effects of any development proposals on the safety of aircraft or the safe and efficient navigation thereof*".

- **Objective EE70** which sets out that it is an objective to *“Realise the optimal use of lands around the Airport. In this regard, a study of optimal land use shall be prepared following the making of the Development Plan”*.

In addition to Objective EE09 (referenced above) which relates to clustering, it is noted that the CDP states that: *“The concept of ‘clustering’ is used to describe the geographic concentration of industry, or more specifically, ‘geographically close groups of interconnected companies and associated institutions in a particular field, linked by common technologies and skills.’ Clustering occurs in Fingal at a number of locations, including at Dublin Airport and in various industrial and business parks. Advantages of clustering include cost and economies of scale, innovation, partnership opportunities, access to raw materials and availability of a skilled workforce”* (our emphasis).

It is noted that there are similar distributions/logistics operations in the vicinity of the subject site at Kilshane Cross including the existing operations at the Dublin Airport Logistics Park. This existence of similar facilities at this location has confirmed our clients view as to the appropriateness of relocating their operations to this area. It is considered that our client’s proposals are consistent with the clustering concepts of the current CDP.

#### 4.1.2 Subject Lands

The subject lands are located in the ‘South Fingal Fringe’ area in the current *Fingal County Development Plan 2011-2017* (the ‘CDP’). This is an umbrella term for Charlestown, Meakstown, Ballymun, Santry, Clonshaugh, Belcamp, Balgriffin and the lands between the Airport and M50. Relevant points made in the CDP in respect of this ‘South Fingal Fringe’ area include:

- The lands are nationally important given their location south of Dublin Airport and their proximity to the M50 and M1.
- The area acts as a gateway to Fingal and provides the first impression of the County; it also acts as a transition area between the City and the County.
- A fundamental consideration for future development in the area is safeguarding the current and future operational, safety, technical and development requirements of Dublin Airport.
- There is a need for the co-ordination of land uses and environmental improvements in this area.

The subject lands are zoned ‘GB-Greenbelt’ in the CDP. The vision for ‘GB’ zoned land is to:

*“Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of*

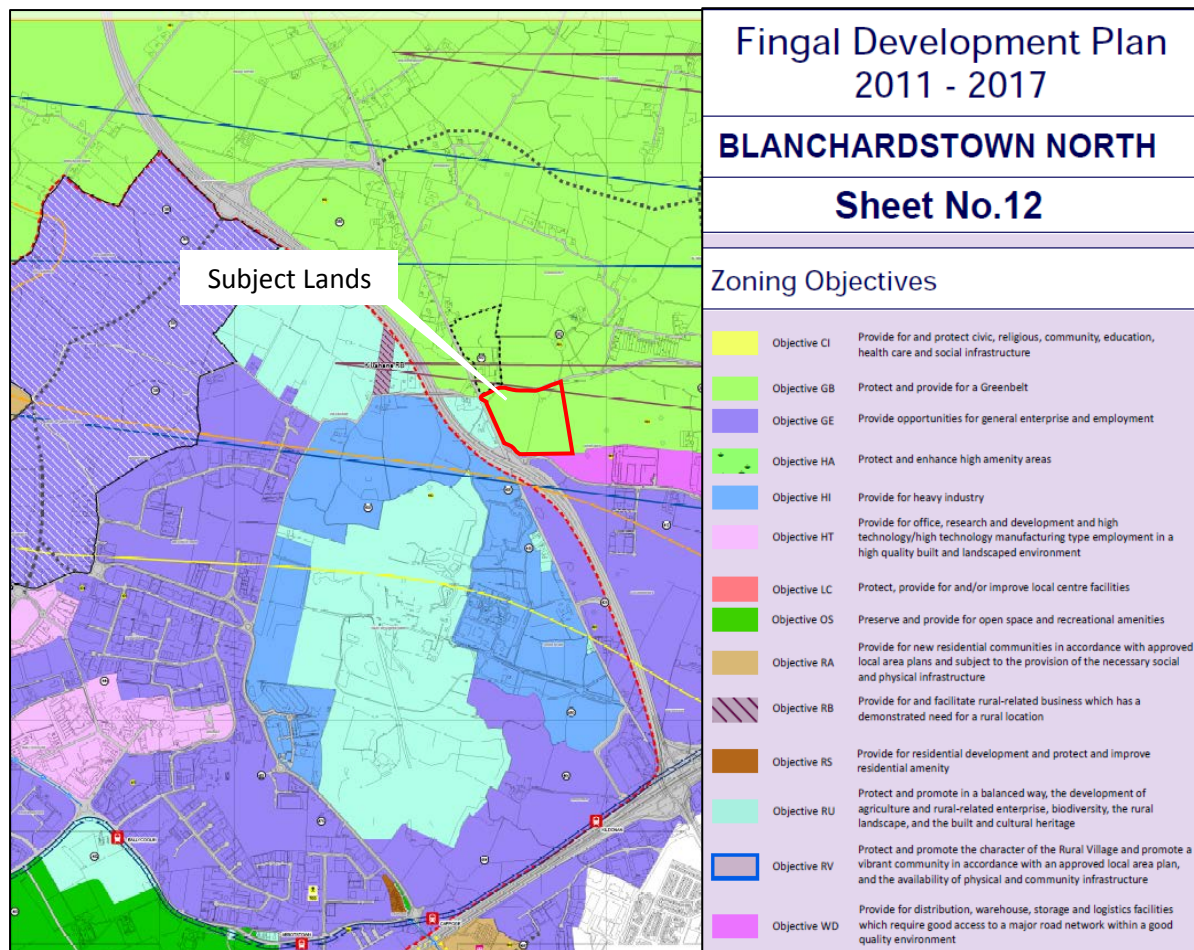


*undeveloped town areas by ensuring that urban development is directed towards these areas.”*

Observations on the zoning and other policy objectives of the surrounding lands include:

- The lands to the north of the R108 (i.e. TJ O’Mahony builder’s yard and Blue Steel Stockholders Ltd. providers) are also zoned ‘GB-Greenbelt’ with a site specific local objective (No. 392) which provides for *“the reasonable extension and improvement of the existing uses on site and/or facilitate the relocation of the existing use within the site but outside the Inner Public Safety Zone”*.
- The lands adjoining and immediately to the south of the subject lands (i.e., the Dublin Airport Logistics Park) are zoned ‘WD–Warehouse Distribution’ with an overall objective to *“Provide for distribution, warehouse, storage and logistics facilities which require good access to a major road network within a good quality environment”*.
- Lands further to the south extending to the M50 are zoned ‘GE-General Enterprise’ with an overall objective *“To provide opportunities for general enterprise and employment”*.
- Lands to the west of subject lands are zoned ‘RU–Rural’ with an objective to *“protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage”*.
- Further west of the N2 lands are zoned ‘HI-to provide for heavy industry’; and
- The inner public safety zone (Airport) is located along the northern boundary of the site, however the subject lands are located within the Outer Public Safety Zone.

The existing zoning of the subject lands and adjoining lands is illustrated in **Figure 4.1**.



**Figure 4.1 Location of Subject Lands in Current Fingal Development Plan 2011-2017**

## 4.2 DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023

The *Draft Fingal Development Plan 2017-2023* (the 'Draft Plan') was published by Fingal County Council on the 19<sup>th</sup> February 2016.

### 4.2.1 Overall Strategy

The Draft Plan continues to reference the strategic advantages of Fingal in terms of accessibility to national and international markets. Its 'strategic regional position' is discussed in Chapter 6 'Economic Development' which sets out:

*"Fingal has a number of competitive advantages that the economic strategy for the County will seek to maximise upon. These advantages include Fingal's strategic location within the EMRA, being part of the Dublin City Region and being included within the **Dublin-Belfast Economic Corridor**.*

*City regions are critically important for economic development, and Dublin is the country's only city of an international scale. On its own, the Dublin region (comprising the four Dublin local authorities) comprised 41.9% of the national GDP in 2012.*

*There are a number of primary infrastructural assets associated with Fingal that are also of regional and indeed national importance. These are located within and/or traverse the County, and include Dublin Airport; the **motorway networks of the M50, M1 (which also provides access to Dublin Port via the Port Tunnel)**, N2/ M2 and N3/M3; and the rail links of the Dublin-Belfast inter-city route, the DART and suburban rail service.*

*The **Dublin-Belfast Economic Corridor** is a spatial and economic concept included in the National Spatial Strategy 2002-2020 and in the 2011-2017 Development Plan, and of continuing relevance to Fingal. The potential of the Corridor is further enhanced by the strong performance of the Belfast city region in terms of investment attraction and high quality employment creation. The benefits associated with the Corridor arise from the settlements along its length becoming centres for focused development. The economic integrity of the Corridor can be enhanced through the facilitation of a critical mass in a physical and economic sense within existing settlements. At a strategic level, the Corridor concept provides the possibility of a series of development opportunities in towns along the M1 motorway and the Dublin-Belfast rail line subject to the requirements of proper planning and sustainable development, the settlement hierarchy and the provision of transport infrastructure. For the integrity of the Corridor to be sustained and protected, only appropriate developments will be permitted at certain locations within the Fingal Settlement Strategy” (our emphasis).*

Relevant policy objectives within the Draft Plan include:

- **Objective ED01** *Ensure that there is a sufficient quantum of zoned lands to facilitate a range of enterprise development and a mix of employment creation across all business and industry sectors within Fingal.*
- **Objective ED09** *Maximise the sustainable economic potential of Fingal’s, through sustainable means, being part of the Dublin City Region, the County’s unique strengths and its advantageous position within the East and Midlands Regional Assembly.*
- **Objective ED10** *Maximise sustainable economic opportunities associated with the presence of key infrastructural assets within the County including Dublin Airport, the national motorway network, railway services, and the close proximity to Dublin City and Dublin Port via the Port Tunnel*
- **Objective ED11** *Ensure that Fingal plays a pivotal role in the promotion of Dublin as the primary Gateway in the Eastern and Midlands Region through engaging and collaborating with the other Dublin local authorities and the East and Midlands Regional Assembly.*
- **Objective ED12** *Realise the benefits associated with the Dublin-Belfast Economic Corridor through supporting appropriate forms of development at key locations in accordance with the Fingal Settlement Strategy.*

- **Objective ED13** *Engage and collaborate with adjoining local authorities and regional assemblies, as appropriate, to promote the continued economic development of the Dublin–Belfast Economic Corridor.*

It appears that clustering of similar forms of development will continue to be supported by Fingal County Council. The Draft Plan states that the Council will continue to promote clustering due to its economic advantages:

*“Sustainable economic development also can be achieved through **clustering**. A key economic policy concept, whereby enterprises and industries that have common features cluster together in locations in order to achieve economies of scale and derive the benefits associated from networking opportunities, innovation, synergies, sharing a skilled workforce, and the use of developed infrastructure”. (pg 184)(our emphasis)*

With regard to clustering, the Draft Plan contains the following objective *inter alia*:

**Objective ED04** *“Support existing successful clusters in Fingal, such as those in the ICT, pharmaceutical, aviation and agri-food sectors, and **promote new and emerging clustering opportunities across all economic sectors within the County**”. (our emphasis)*

It is considered that Killeen’s request for the rezoning of the subject lands at Kilshane Cross for the purposes of locating their vehicle storage and distribution operations at this location would complement the existing clustering of logistics/distribution uses in the area and this proposal represents an opportunity to deliver the objectives of the Draft Plan to promote and encourage the economic clustering in the County. In this regard it is important to reiterate (as set out in **Section 2.1** of this submission) that Killeen has a long established experience and track record in the field of logistics and distribution.

#### 4.2.2 Subject Lands

The land use zonings which feature in the CDP were considered by Fingal to have continuing relevance and applicability to the Draft Plan period and accordingly there are no proposed changes to the land use categories.

It is proposed that the subject lands remain zoned ‘GB-Greenbelt’ (see **Figure 4.2**) in the Draft Plan. As set out in Chapter 11 of the Draft Plan, the vision for this land use remains as per the current Development Plan. Other proposed changes include:

- Proposed rezoning of lands west of the subject lands between the N2 and R135 from ‘RU-Rural’ to ‘GB-Greenbelt’. This ‘island’ between the N2 and R135 has limited development potential.
- Proposed rezoning of a large portion of land to the west of the N2 from ‘RU-Rural’ to ‘HI-Heavy Industry’.
- ‘GE-General Enterprise’ zoned lands to the south extending to the M50 are identified for a Masterplan (ref 11.B).

- Proposed rezoning of lands to the north-west of the N2 from 'RU-Rural' and 'RB-Rural Business' to 'GE-General Employment'. They have also been identified for a Masterplan (ref 12.A). This extends the 'development boundary' of lands to the west of the N2 and north of the M50 to the north. It is noted that a small portion of these lands are located within the western extremity of the inner public safety zone (Airport).

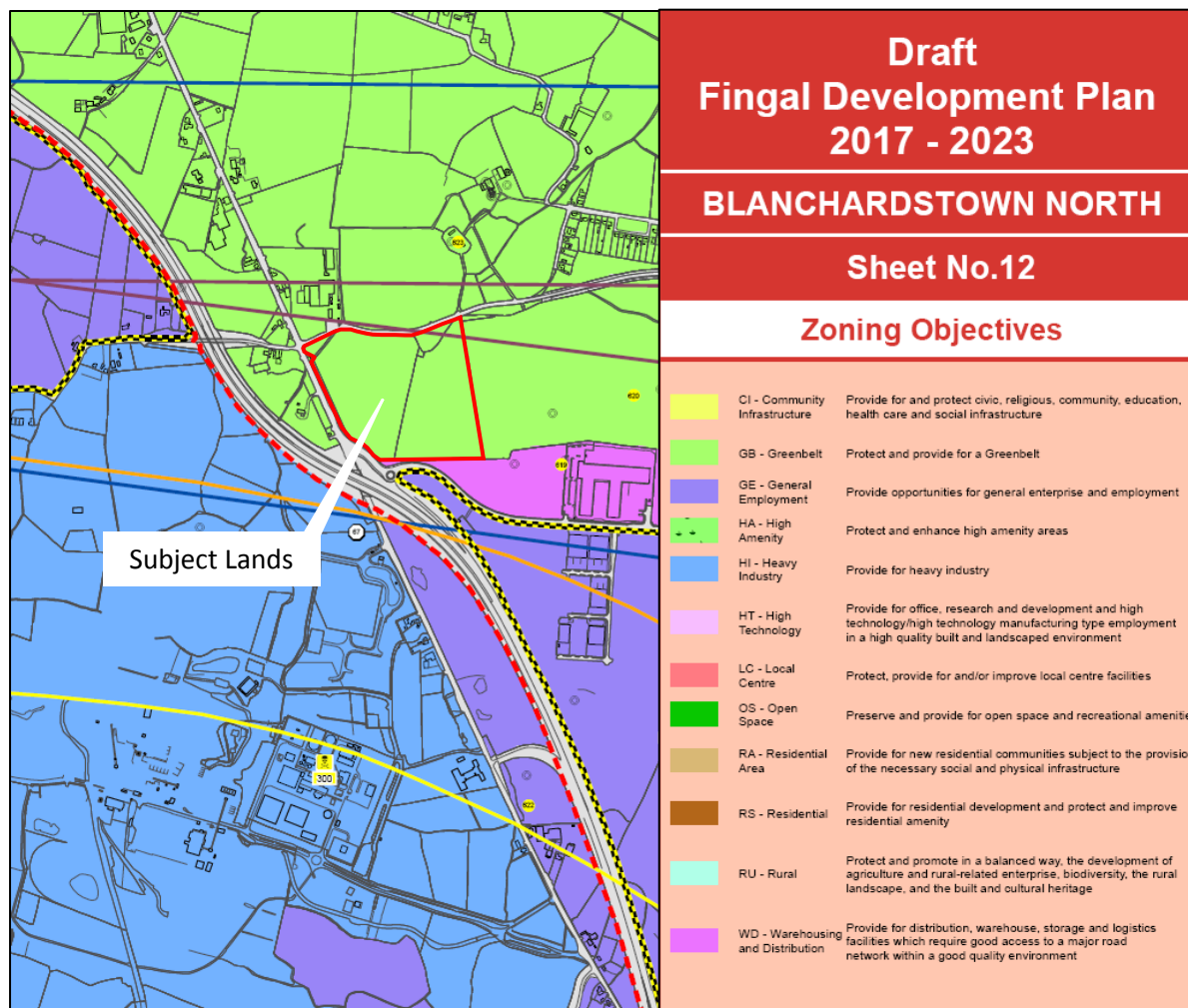


Figure 4.2 Location of Subject Lands in Draft Fingal Development Plan 2017-2023

#### 4.2.2.1 Masterplans

In the Draft Fingal County Development Plan a number of Masterplans are identified to be prepared and/or implemented during the lifetime of the Plan. The intention is that these Masterplans “will assist in achieving quality development in terms of, inter alia, urban design, structure, delivery of community/amenity facilities and permeability. Subsequent planning applications will be required to adhere to the approved Masterplans. Masterplans will be subject to a public consultation process and presentation to the Elected Members of the Planning Authority” (Section 11.3).

The Draft Plan includes a non-site specific Masterplan specifically for ‘WD’ zoned lands, namely: “Objective ED97 Prepare a Masterplan within the lifetime of the Development Plan for Warehouse and Distribution zoned lands in collaboration with key stakeholders, relevant agencies and sectoral representatives.” In this regard, the Draft Development Plan includes only two locations for WD zoned land. The first is located immediately adjacent to the subject lands at Newtown, Kilshane

Cross (i.e., the northern part of the Dublin Airport Logistics Park); the other is located to the south-east between the existing Sillogue Golf Course and the M50. These lands are considered further in **Section 5.1.1**.

In addition, two site specific Masterplans have been identified for lands near the subject site. These Masterplans are specifically for ‘GE-General Employment’ zoned lands and are identified in **Table 4.1**. The first Masterplan is identified for the majority of the Airport Logistics Park (south of the ‘WD’ zoned lands and main access route through Park), extending to the M50 in the south and Sillogue Golf Club to the east. The second Masterplan is for lands to the west of the N3 and to the north-west of the subject site.

Objective ED86	
<p>Prepare and/or implement the following Masterplans during the lifetime of this Plan: Dubber</p> <p>(See Map Sheet 11, MP 11.B)</p>	
<p>Kilshane Masterplan: These lands shall be fully integrated from the adjoining General Employment lands.</p> <p>(See Map Sheet 12, MP 12.A)</p>	

**Table 4.1 Relevant Land Use Zoning Objectives**

### 4.3 COMMENTARY ON EXISTING AND PROPOSED ZONING

The overall planning context of the subject lands having regard to existing development and existing and proposed land use zoning objectives is illustrated in **Figure 4.3**. In this regard, it is considered that from a strategic land use perspective the lands are suited for appropriate development such as the low intensity, long term, user specific proposal by Killeen based on the following:

- The lands are bounded by a quality road network, are immediately accessible to the national road network and are located approximately 10km from the northbound exit of the Port Tunnel. Furthermore, this road network is intensively used by commercial traffic – in particular HGV's and logistics/distribution vehicles, including those associated with tenants of the Dublin Airport Logistics Park. Furthermore, significant investment has been made to the infrastructure immediately adjacent to the subject site in particular the roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park and it could directly serve the subject site without impacting on the capacity of the network.
- The lands do not form an effective part of the Greenbelt. They do not provide meaningful separation between built up/developed areas, or provide recreational amenities. Furthermore, there is commercial development in the form of a builder's yard and Blue Steel Stockholders Ltd. already within the Greenbelt zoning to the north of the R135 (to the immediate north of the subject lands).
- The requested 'WD' zoning would be complementary to the existing adjoining uses and promote clustering of similar logistics/distributions uses in this area of Fingal (which it is noted is supported by Fingal County Council in the Draft Plan).
- The 'WD' zoning would constitute an appropriate zoning transition between the following land uses:
  - The significant tracts of land to the west of the N2 (west and north-west of the subject lands) which have been zoned for economic development.
  - The Ancillary Related Airside Services uses which are proposed at Dublin Airport which includes *inter alia* long-stay parking, taxi, feeder park, car hire, staff parking, and logistics; and
  - The existing builder's yard and steel stockholding enterprise to the immediate north and adjoining Green Belt lands.

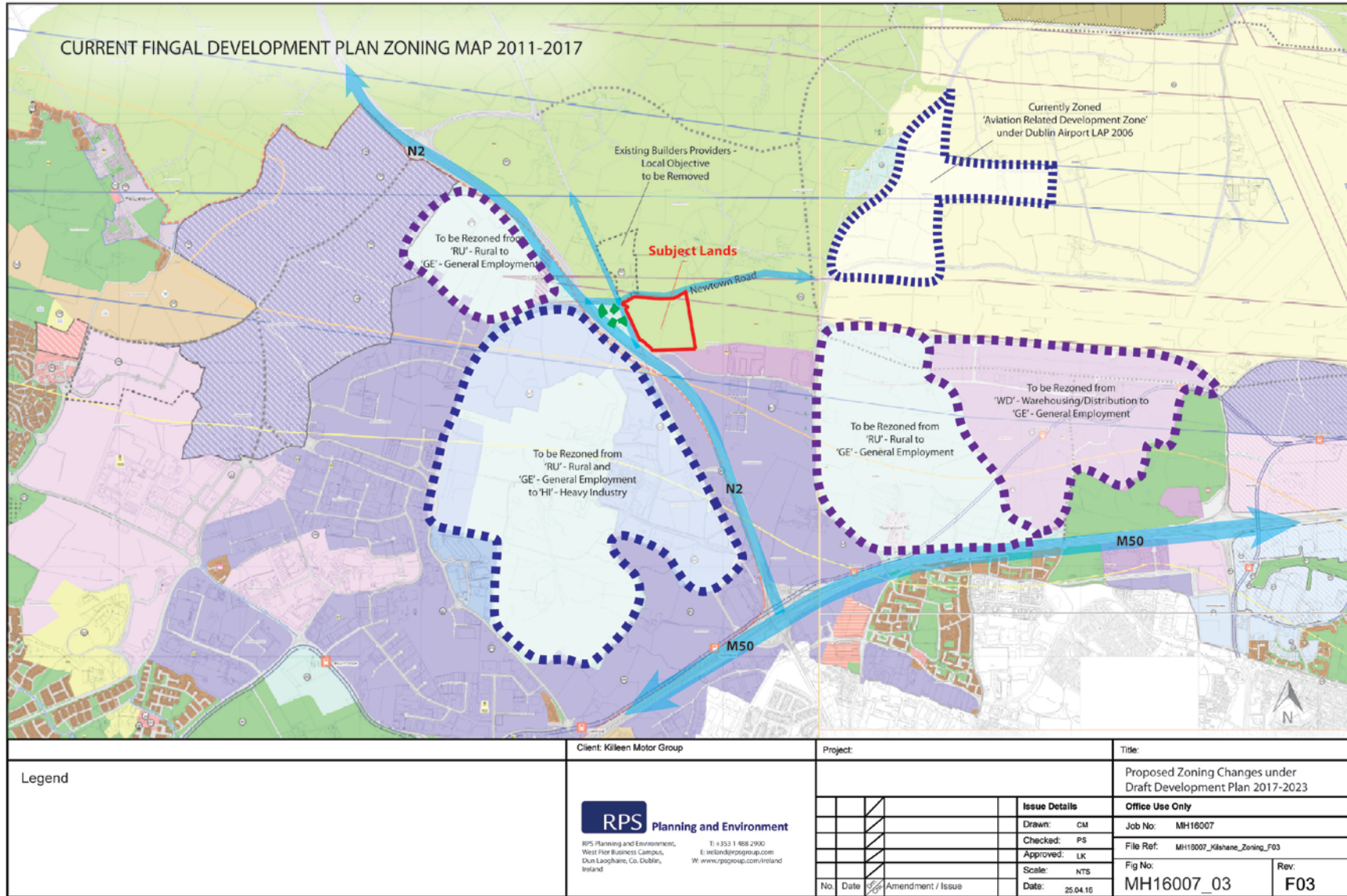


Figure 4.3 The Subject Lands in the Context of Proposed Zoning Changes under Draft Fingal Development Plan 2017-2023



## 5 PROPOSED REZONING OF THE SUBJECT LANDS TO ‘WD’

This submission seeks the rezoning of the subject lands at Newtown, Kilshane Cross, Dublin 11 from ‘GB- Greenbelt’ to ‘WD-Warehouse and Distribution’. This is considered an appropriate zoning given the context of the site and the long-term objectives of Killeen in relation to its future operations in Fingal and their specific site requirements (as identified in **Section 2.2** of this submission).

It is noted that the ‘WD’ land use zoning objective is described in both the current statutory *Fingal County Development Plan 2011-2017* (the ‘CDP’) and the *Draft Fingal County Development Plan 2017-2023* (the ‘Draft Plan’) as having the purpose to facilitate enterprise opportunities associated with distribution, warehouse, storage and logistics activities. It is also noted that there has been no proposed material change in relation to the zoning (in terms of overall objective, vision and use classes permitted in principle) in the Draft Development Plan.

**Table 5.1** considers the WD zoning objective in the context of the subject lands at Newtown, Kilshane Cross.

	<b>CDP (2011 -2017) / Draft Plan (2017 – 2023) – No change in the wording</b>	<b>Relevance to the Subject Site and its Proposed Use for Distribution/Logistics Activities</b>
Objective	<i>Provide for <b>distribution, warehouse, storage and logistics facilities</b> which <b>require good access to a major road network within a good quality environment.</b>(our emphasis)</i>	<p>The proposed use of this site for logistics/distribution purposes by Killeen will involve:</p> <ul style="list-style-type: none"> <li>• Importation and storage of motor vehicles, preparation activities and ancillary administration, staff facilities and storage (of a minor nature);</li> <li>• Loading and unloading of vehicles;</li> <li>• Preparation of vehicles for distribution to dealerships; and</li> <li>• Distribution of motor vehicles to Toyota/Lexus dealerships nationwide.</li> </ul> <p>This type of facility needs to be strategically located to ensure operational efficiencies and have easy access to the wider national road network. Proximity to Dublin Port, the Port Tunnel and the M50 are of particular relevance.</p> <p>The lands at Newtown, Kilshane Cross are ideally located in our client’s opinion for the location of their logistics/distribution operations.</p>
Vision	<i><b>Facilitate logistics and warehouse type activity including storage, distribution and associated re-packaging of goods and products.</b> Distribution and storage uses have <b>specific transportation requirements</b> as they can generate considerable traffic volumes and hence benefit from being located within a purpose</i>	<p>The proposed use for the lands is for logistics activity including storage and preparation of Toyota/Lexus motor vehicles prior to distribution nationwide and is therefore compliant with the vision for WD zoned land.</p> <p>Furthermore, it is noted that lands immediately abutting the subject lands to the south are also</p>

	<b>CDP (2011 -2017) / Draft Plan (2017 – 2023) – No change in the wording</b>	<b>Relevance to the Subject Site and its Proposed Use for Distribution/Logistics Activities</b>
	<i>built, well designated environment which is <b>well connected to the strategic road network and allows for the efficient movement of goods.</b> (our emphasis)</i>	zoned WD. Indeed, this site is only 1 of 2 such sites proposed to be zoned WD in the Draft Development (refer to <b>Section 5.1.1</b> of this submission which sets out an analysis of the WD zoned lands as per the Draft Development Plan).  Significant investment has been made to the infrastructure immediately adjacent to the subject site in particular the roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park. This has resulted in good connectivity to the existing strategic road network. This has been an influential factor in Killeen’s decision to locate their storage, logistics/distribution operations to the subject lands.
Use Classes related to Zoning Objective	<ul style="list-style-type: none"> <li>• Cargo Yards</li> <li>• Heavy Vehicle Park</li> <li>• Logistics</li> <li>• Office ancillary to permitted use</li> <li>• Road Transport Depot</li> <li>• Vehicle Servicing/Maintenance Garage</li> </ul>	It is considered that the proposed logistics/distribution use is consistent with uses Permitted in Principle under the WD land use zoning objective including the following:  <i>“Cargo Yards, Heavy Vehicle Park, Logistics, Office ancillary to permitted use, Road Transport Depot, and Vehicle Servicing/Maintenance Garage.”</i>

**Table 5.1 - Consideration of the ‘WD’ Zoning Objective and the Subject Lands**

A number of policy objectives for the WD zoning objective are identified in Chapter 6 of the Draft Plan entitled ‘Economic Development’. **Table 5.2** considers these objectives in the context of the subject lands at Newtown, Kilshane Cross.

<b>‘WD’ Policy Objectives</b>	<b>Relevance to the Subject Site</b>
<b>Objective ED97</b> - Prepare a Masterplan within the lifetime of the Development Plan for Warehouse and Distribution zoned lands in collaboration with key stakeholders, relevant agencies and sectoral representatives.	It is noted that the quantum of ‘WD’ zoned lands within County Fingal, as indicated in the Draft Plan, is small and in two separate locations (as discussed in <b>Section 5.1.1</b> of this submission).
<b>Objective ED98</b> - Encourage large-scale distribution activities to locate within areas zoned WD	Killeen’s proposals to relocate their storage and distribution activities to the Newtown, Kilshane lands would comply with Objective ED98.
<b>Objective ED99</b> - Ensure that sufficient land is reserved around site boundaries, in both individual sites and industrial parks to accommodate landscaping which will soften the visual impact and reduce the biodiversity loss of the development and improve the quality of the environment.	Killeen can confirm that appropriate boundary treatments and landscaping would be provided at the subject lands in compliance with this objective. It is envisaged that any proposals would be the subject of pre-planning discussion and agreement with the Planning Authority.

**Table 5.2 - Consideration of related ‘WD’ Policy Objectives and the Subject Lands**

## 5.1 RELEVANT CONSIDERATIONS

### 5.1.1 Audit of 'WD' Zoned Lands in Draft Fingal Development Plan 2017-2023

An argument could be made for the subject lands to be rezoned 'GE – General Employment', however, unlike WD zoning which is a discrete low intensity zoning relating to logistics and distribution uses, the GE land use zoning is wider in the range of uses it permits subject to their contribution towards the achievement of the zoning objective. A WD zoning objective is therefore considered the most compatible land use zoning objective in the context of its location and with the operational requirements of Killeen. However, it is noted by Killeen that WD zoning is the smallest economic development land use zoning in terms of total amount of land zoned in the County (21.9ha) in the Draft Plan. Refer to **Figure 5.1**.

Zoning	Objective	Total Amount Zoned (Ha)
DA – Dublin Airport	<i>Ensure the efficient and effective operation and development of the airport in accordance with an approved Local Area Plan.</i>	1024.5
FP – Food Park	<i>Provide for and facilitate the development of a Food Industry Park.</i>	188.62
GE - General Employment	<i>Provide opportunities for general enterprise and employment.</i>	1829.7
HI – Heavy Industry	<i>Provide for heavy industry</i>	293.5
HT – High Technology	<i>Provide for office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment.</i>	690.8
ME – Metro Economic Corridor	<i>Facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor.</i>	390.3
RB – Rural Business	<i>Provide for and facilitate rural-related business which has a demonstrated need for a rural location.</i>	92.6
RW – Retail Warehousing	<i>Provide for retail warehousing development</i>	31.4
WD – Warehousing and Distribution	<i>Provide for distribution, warehouse, storage and logistics facilities which require good access to a major road network within a good quality environment.</i>	21.9

**Figure 5.1 Quantum of Zoned Employment Generating Land (2016)**

[Table 6.3: Draft Final Development Plan 2017-2023]

RPS has reviewed the provision of the WD zoned lands in the Draft Plan. It is interesting to note that the total quantum of land zoned 'WD' has been reduced from 157 ha to 21.98 ha i.e. by 86%. This is not consistent with the specific wording and requirements of Policy Objective ED01, ED10 and ED98 (as referenced in **Section 4.2.1** of this submission) which *inter alia* set out:

- **Objective ED01:** *Ensure that there is a sufficient quantum of zoned lands to facilitate a range of enterprise development and a mix of employment creation across all business and industry sectors within Fingal.*
- **Objective ED10** *Maximise sustainable economic opportunities associated with the presence of key infrastructural assets within the County including Dublin Airport, the*

*national motorway network, railway services, and the close proximity to Dublin City and Dublin Port via the Port Tunnel.*

- **Objective ED98** - Encourage large-scale distribution activities to locate within areas zoned WD

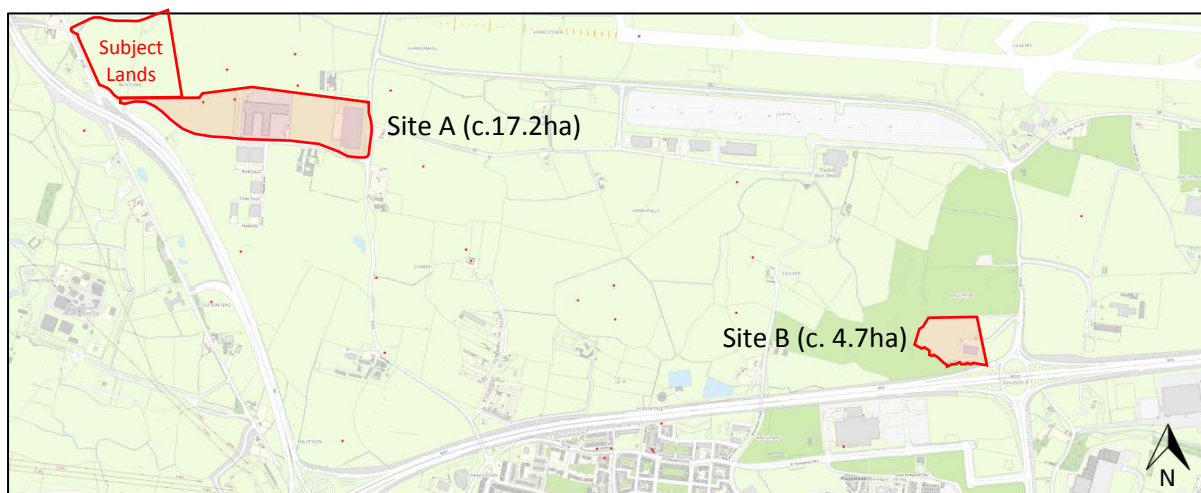
**TABLE EE01: QUANTUM OF ZONED EMPLOYMENT GENERATING LAND PROVIDED IN THE PLAN**

Zoning Type	Quantity Land Zoned (Ha)	Quantity Land Developed (Ha)	Quantity Land Undeveloped (Ha)	% Land Developed
WD	157	49	108	31%
GE	1155	586	569	51%
GE (LAP)	431	41	390	10%

**Figure 5.2 Quantum of Zoned Employment Generating Land (2011)**

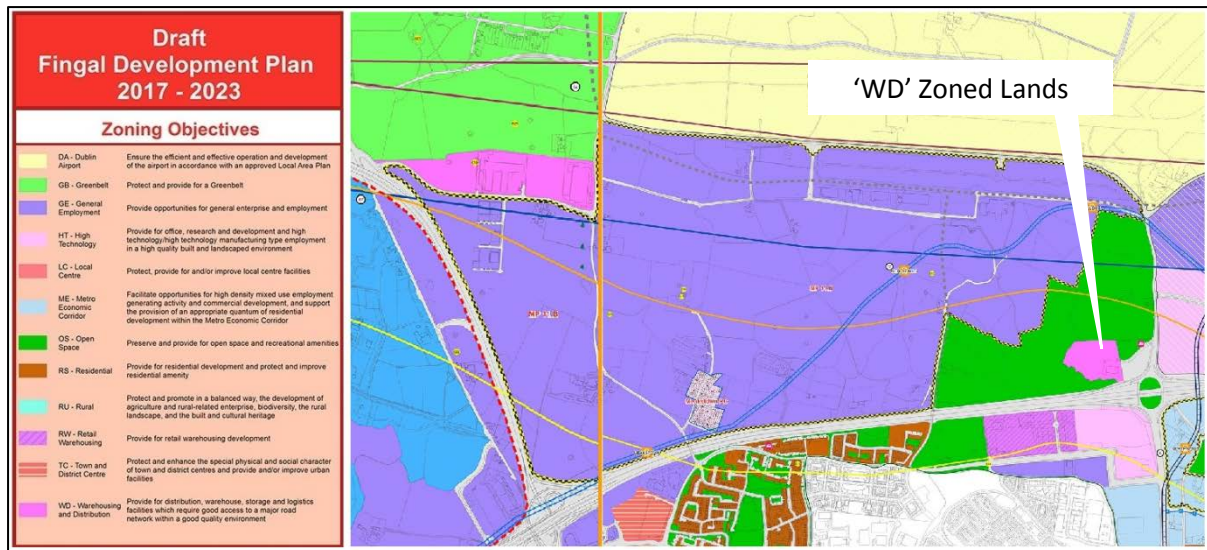
[Table EE01: Fingal Development Plan 2011-2017]

It is further noted that the Draft Development Plan identifies only two locations within the development plan area to be zoned 'WD'. The larger of these two sites (Site A) is located in Dublin Airport Logistics Park immediately adjoining the south of the subject lands (see **Figure 5.3**). The c. 17.2ha site is accessed directly off the N2 National Primary Road by Elm Road/St. Margaret's Road and currently contains DHL Express and Eason and Son Ltd. The smaller site (Site B) is located in North Point Business Park off Junction 4 of the M50 (see **Figure 5.4**). The c. 4.7ha site is accessed by Silloge Green off the R108 Naul Road and currently contains an NCT Centre.



**Figure 5.3 Location of Sites Zoned 'WD' under the Draft Fingal Development Plan 2017-2023**

The zoning of the 'WD' sites is shown in context of the other zoning objectives for the area.



**Figure 5.4 Extract from Draft Fingal Development Plan 2017-2023 - Zoning Map Sheet Nos. 11 & 12**

Having considered the quantum of land available within the WD zoned areas, Killeen has considered that (based on their specific site requirements) neither of these sites is suitable for the proposed use, notwithstanding the appropriateness of their 'WD' zoning objective.

RPS has also examined the WD zoned lands identified in the Draft Fingal Plan and set out an analysis below:

The commentary in relation to Site A and Site B should be read in conjunction to **Figure 5.3**.

#### **Site A: Dublin Airport Logistics Park:**

**Site A** is identified on **Figure 5.3** of this submission. Site A currently contains distribution/logistic bases for Eason and Son Ltd (Unit 1) and DHL Express (Unit 3). It is noted that between these two developments there is an undeveloped parcel of scrubland measuring approximately 3.8ha with approximately 175m of road frontage. To the west of DHL Express it is noted that there is another parcel of undeveloped scrubland measuring approximately 4.8ha with approximately 424m of road frontage. Site A contains the remains of a ringfort which is a Protected Structure (RPS Ref. 619). Other than the parent permissions for the Logistics Park which are summarised in **Section 3.2.2** of this submission, there are no current planning applications or relevant planning permissions for these two parcels of land available on Fingal County Council's online planning search facility.

Having reviewed the location, context and planning history of Site A, it is submitted that the undeveloped parcels of land here represent potential appropriate locations for the expansion of the existing uses within the Dublin Airport Logistics Park or the development of similar type uses and building formats. Having considered Killeen's specific site requirements (as set out in **Section 2.2**) it is concluded that this site is of **insufficient** size for Killeen's operational purposes.

#### **Site B: North Point Business Park**

**Site B** is identified on **Figure 5.3** of this submission. Site B is located in North Point Business Park, at Northern Cross, Ballymun off Junction 4 of the M50. This site equates to approximately 4.7ha. it is accessed by Silloge Green off the R108

Naul Road. While the R108 Naul Road is in good condition, it is noted that Silloge Green is narrow and in poor repair. To the north, south and west of the site is Silloge Golf Course which is zoned for

Open Space (OS). To the east, Site B is bound by Junction 4 of the M50. Also located to the east is a site that has been identified for Traveller Accommodation. Site B currently contains North Point 1 NCT Centre. The remaining undeveloped portion of these lands (approximately 3.8ha) at Site B is of insufficient size for Killeen's purposes (based on Killeen specific site requirements referenced in **Section 2.2**). It is also considered that the long term future development potential of these lands is inextricably linked to the future of Silloge Golf Course and preparation of the Dubber Masterplan for the 'GE' lands to the north (refer to **Section 4.2.2.1**).

### 5.1.2 Road Capacity

The National Transport Authority (NTA) i.e., the *Transport Strategy for the Greater Dublin Area 2016-2035*. Section 3.3.6 (page 33 of the strategy) specifically deals with the M50 and states that it is a road of critical importance and is the primary artery for the movement of goods from Dublin Port and Dublin Airport to the rest of Ireland. Regarding the capacity of the M50 the introduction states in Section 1.1.3 that traffic levels on the M50 have continued to grow even during the economic downturn and delays are a common feature. So the strategy is aimed at reducing the commuter related trips in favour of the movement of goods for economic benefit.

Section 3.3.7 of the strategy document deals with Dublin Port and links it to the M50 and the Port Tunnel. It sets out that *"The majority of goods vehicles using Dublin Port are required to travel to and from the port estate via the Dublin Port Tunnel, the M50 and the various national radial routes connecting with the M50. It is, therefore, essential that the capacity of these routes is safeguarded for strategic trips of high economic value, particularly for the movement of goods"*

Section 7.12 relates to Land Use and Transport Integration and states that the strategic transport function of national roads, including motorways, should be maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network. It further states that land use integration should be to reduce the distance travelled and the time taken to travel.

It is submitted that both the Draft Development Plan and the NTA's Transportation Strategy clearly endorse the strategic importance of the road network (in particular Dublin Port Tunnel, the M50 and the national radial routes connecting with the M50) and would also support land use planning which safeguards the strategic road network for travel patterns involving the movement of goods. It is considered that the rezoning of the subject lands to facilitate distribution/logistics would be consistent with both these strategic objectives.

Furthermore, we would note Objective EE02 of the Draft Plan which has the objective for Fingal to *"Collaborate with the three other Dublin Local Authorities to promote the competitiveness, prosperity and sustainable development of the Dublin City Region."* In this regard, it is considered that relocating distribution/logistics uses from two separate locations within the M50 to a more accessible and suitable location within Fingal is consistent with the principles of sustainable land use for the GDA.

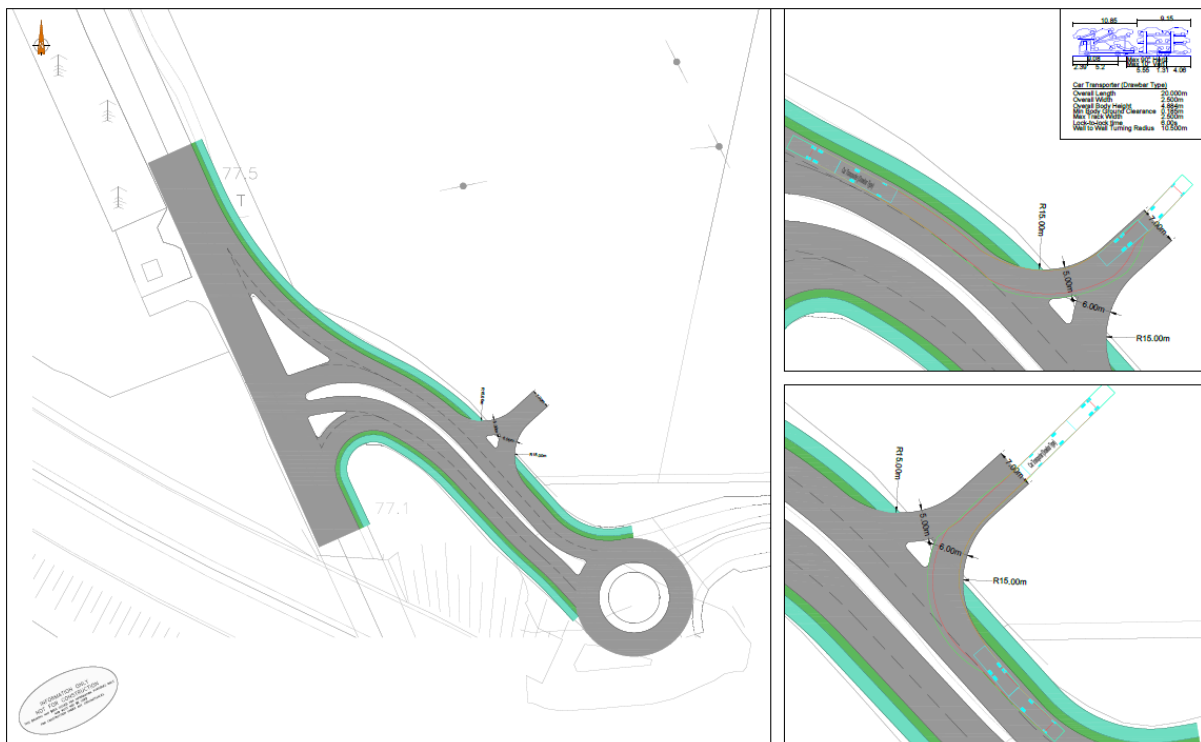
### 5.1.3 Access

The strategic accessibility of the lands from the port, excellent linkages with the national road network and the advantage of minimising trip lengths in general are major considerations for Killeen. The route from the port to the lands at Newtown, Kilshane Cross would comprise the Dublin Port Tunnel, the M50, the N2 and the R135 - a distance of approx. 20 km. This compares to the current distance of approx. 30km (excluding congestion related delays and costs particularly on the Long Mile Road and the M50/M7 junction). This represents a minimum reduction in journey time of approximately 23% at off peak times and 46 % at peak hours. Refer to **Figure 2.2** and **Figure 2.3** which graphically illustrates this.

The lands are currently accessed off the R108 and it is possible to maintain this as the main access; however, given the nature of the road there may be visibility issues in the short term/in the absence of improvements to the alignment of the road.

It is therefore proposed that a new access point would be created before the Dublin Airport Logistics Park roundabout. This solution would avail of the significant investment made to the infrastructure immediately adjacent to the subject site and in particular the roundabout junction providing southbound access onto the N2 and access to Elm Road and the Dublin Airport Logistics Park.

The proposed new entrance would operate on a left-in left out basis with access to the M50 and all major national routes easily accessible. Refer to **Figure 5.5**. In this way access to the site would not affect the Kilshane Cross junction.



**Figure 5.5 Proposed Access Arrangements for Site**

#### 5.1.4 Safety Considerations

In 2005 The Department of Transport and the Department of Environment, Heritage and Local Government commissioned an investigation into Public Safety Zones (PSZs) at Ireland's three principal airports: Cork, Dublin and Shannon. The report recommends preventing developments which attract large numbers of people, e.g. high density housing, schools, hospitals, in the Outer Public Safety Zone (OPSZ).

Car parks are permitted in OPSZs provided that people park their cars and leave the development. Buildings associated with the car park are subject to guidance (as set out in Table 6.1 of the CDP).

It is noted that Chapter 7 of the Draft Development Plan states the following in relation to safety considerations: *"The Council will continue to follow the advice of the Irish Aviation Authority regarding the effects of proposed development on the safety of aircraft and the safe and efficient navigation thereof."*

- **Objective DA13:** *Promote appropriate land use patterns in the vicinity of the flight paths serving the Airport, having regard to the precautionary principle, based on existing and anticipated environmental and safety impacts of aircraft movements.*
- **Objective DA14:** *Implement the policies to be determined by the Government in relation to Public Safety Zones for Dublin Airport.*
- **Objective DA15:** *Take into account relevant publications issued by the Irish Aviation Authority in respect of the operations of and development in and around Dublin Airport.*
- **Objective DA16:** *Continue to take account of the advice of the Irish Aviation Authority with regard to the effects of any development proposals on the safety of aircraft or the safe and efficient navigation thereof.*

The subject lands are located predominantly within the Outer Public Safety Zone (OPSZ) of the airport; however, a small part of the lands located along its northern boundary with the Newtown Road are located within the Inner Public Safety Zone (Airport). In this regard, we would note the following:

- The proposed use is not general enterprise or industrial, but specifically storage and preparation of vehicles for distribution to dealerships.
- It is a type of development which is similar to airside services at the airport, and which will not impact on the safety of aircraft or the safe and efficient navigation thereof.
- The nature of ancillary operational buildings / structures (including staff accommodation) will be very modest and low-scale and would be consistent to those in evidence at the various long-term car parks around the airport.
- The site is within the outer public safety zone and the Inner Airport Noise Zone. Development is not prohibited within these zones, subject to consultation with the Irish Aviation Authority on land use density (public safety) and noise sensitivity.



It is submitted that the nature of the proposed use does not present any safety issues having regard to the OPSZ and IPSZ associated with Dublin Airport.

## 5.2 SUMMARY

It is considered that the subject lands are suitable for 'WD – Warehouse and Distribution' zoning for the following reasons:

- The 'WD' land use zoning would be a natural and logical extension to the established 'WD' land use zoning objective immediately adjacent to the south of the subject lands. Additional low intensity economic zoning to the Newtown Road would be more appropriate and gradual transition between land uses, from the extensive GE zoning to the south to greenbelt to the north.
- The development potential of the lands having regard to their immediate accessibility to the national road network and the potential to cluster logistics / distribution / wholesale uses in this area.
- The proposed 'WD' zoning is consistent with the nature of nearby and adjoining uses (including those at the airport). It is noted that lands on the Western Campus of Dublin Airport (to the north west of the subject lands) have been identified in the DA LAP for Ancillary Related Airside Services which includes inter alia long-stay parking, taxi feeder park, car hire, staff parking, logistics, and aviation related light industrial uses. It is considered that Killeen's proposals for the subject lands are a similar type of development to airside services at the airport. Based on this it can reasonably be concluded that the uses proposed will therefore not impact on the safety of aircraft or the safe and efficient navigation thereof.
- Killeen's proposed use for the subject lands for the storage of vehicles and the preparation of vehicles for distribution to dealerships in Ireland is consistent with similar uses Permitted in Principle under the 'WD' land use zoning objective including: *Cargo Yards, Heavy Vehicle Park, Logistics, Office ancillary to permitted use, Road Transport Depot, and Vehicle Servicing/Maintenance Garage.*

Furthermore:

- The inner public safety zone associated with Dublin Airport's east-west runway affects only a small portion of the site stretching east along the Newtown Road. The safety zone sets a logical boundary to development north of the Newtown Road.
- The site is within the outer public safety zone and the Inner Airport Noise Zone. Development is not prohibited within these zones, subject to consultation with the Irish Aviation Authority on land use density (public safety) and noise sensitivity. It is a type of development (similar to airside services at the airport) which will not impact on the safety of aircraft or the safe and efficient navigation thereof.
- Proposed use is not general enterprise or industrial, but specifically storage and distribution of cars.

## 5.3 OBSERVATIONS ON ‘GB’ ZONING

### 5.3.1 GB Zoning Objective for the Subject Lands

It is considered that the subject lands do not form an effective part of the Greenbelt. The lands do not provide meaningful separation between the built up/developed areas, or have the potential to provide long-term sustainable agricultural use or recreational amenities. It is considered that development of the lands for an appropriate use would not undermine the integrity of the Greenbelt. In this regard, there is significant development planned to the north-west of the lands (west of the N3) and to the east of the site (as part of the Airport Masterplan). The overall planning context of the subject lands having regard to the existing and proposed land use zoning objectives for the area is illustrated in **Figure 4.3**.

It is considered from a planning perspective that the northern boundary of the Newtown Road is a more logical demarcation for the Greenbelt boundary. This is considered in the context of the stated vision for GB zoned land and related policy objectives detail below.

	2011-2017 Fingal Development Plan	Draft 2017 – 2023 Development Plan and consideration of the GB Zoning at the subject lands
Zoning	Greenbelt-GB	
Objective	<i>‘Protect and provide for a Greenbelt’</i>	Having considered the GB zoning on the subject lands, it is noteworthy that the subject lands:
Vision	<i>Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town</i>	<ul style="list-style-type: none"> <li>• Do not constitute an active greenbelt buffer zone at this location.</li> <li>• Do not contribute to the demarcation of an edge between a rural and an urban area or between two urban areas. In effect they do not function to restrict sprawl from one built up area into another or merging of urban areas.</li> <li>• Are not designated with any Environmental designation.</li> <li>• Do not safeguard the setting, special character of a historical landscape and it is noted that there are no scenic views across the site.</li> <li>• Are bound by roads and other lands zoned for development and/ or in established commercial uses such as distributions/logistics, warehousing, enterprise and industrial uses to the north, south and west.</li> <li>• Are not accessible for public use/recreational use as they are in private ownership.</li> </ul> <p>Furthermore:</p>

	<b>2011-2017 Fingal Development Plan</b>	<b>Draft 2017 – 2023 Development Plan and consideration of the GB Zoning at the subject lands</b>
	<p><i>areas by ensuring that urban development is directed towards these areas.</i></p>	<ul style="list-style-type: none"> <li>• There is existing development on-site (specifically the overhead lines) and on adjoining sites (the existing logistics warehousing and builder's yard).</li> <li>• The immediate accessibility of the lands to the national road network, the investment in road infrastructure in the area and the potential to cluster logistics / distribution / wholesale uses in this area is a clear indication of the sustainable development potential of the lands.</li> <li>• The roads defining the boundaries of the lands to the north, south and west are intensively used by commercial traffic – in particular HGV's and logistics/distribution vehicles, including those associated with tenants of the Dublin Airport Logistics Park.</li> <li>• It is notable that lands on the Western Campus of Dublin Airport (to the north west of the subject lands and identified on <b>Figure 4.6</b> of this submission) have been identified in the DA LAP for Ancillary Related Airside Services which includes <i>inter alia</i> long-stay parking, taxi, feeder park, car hire, staff parking, logistics, aviation related light industrial uses. These uses are consistent with those adjoining the subject lands to the south and the storage, preparation and distribution of vehicles as proposed by on the subject lands by Killeen.</li> <li>• There is development within the Greenbelt to at the north of the subject lands (an existing builder's yard and steel stockholding enterprise).</li> <li>• There is significant tracts of land to the west of the N2 (west and north-west of the subject lands) which have been zoned for economic development.</li> </ul>

**Table 5.3 - Consideration of GB Zoning Objective and the Subject Lands**

## 6 CONCLUSIONS

This submission seeks the rezoning of the subject lands from 'GE- Greenbelt' to 'WD - Warehouse and Distribution' at Newtown, Kilshane Cross, Dublin 11. The lands equate to approximately 32 acres (13ha).

In consideration of the future direction of the business in Ireland, Killeen has noted and taken on board the day-to-day operational experiences and constraints experienced by their logistics/distribution staff. This information has been key in formulating their long-term vision for the company and the critical need to consolidate and relocate the storage and distribution element of the business. The outcome of the review process has resulted in Killeen seeking to relocate its distribution and logistics activities to Fingal and to seek the rezoning of the subject lands. In this regard, Killeen views the subject lands as a key component of the long term strategy for its business operations in Ireland. The rezoning of the subject lands to a 'WD-Warehouse and Distribution' land use zoning objective would facilitate the relocation and consolidation of Killeen's distribution operations to one strategic location. The subject lands at Kilshane Cross are considered by our client to be strategically located and exemplar in this regard.

Based on the consideration set out in **Section 5** of this submission, it is considered that **the proposed 'WD' zoning constitutes an appropriate zoning for the subject lands given the nature of adjoining existing uses, the strategic planning context of the lands, the quality of the immediate road network, the accessibility of the site to the strategic road network** and the long-term objectives of Killeen in relation to its future operations in Fingal as well as Killeen's specific site requirements.

Based on the consideration set out in **Section 5** of this submission, it is also considered that the subject lands **do not function as an effective greenbelt buffer**. It is respectfully suggested that the Newtown Road is a more logical demarcation for the Greenbelt boundary.

The requested 'WD' zoning would also be complementary to the existing adjoining uses and promote clustering of similar logistics/distributions uses in this area of Fingal (which it is noted is supported by Fingal County Council). It is also considered that a 'WD' zoning would constitute an appropriate zoning transition between the following land uses:

- The significant tracts of land to the west of the N2 (west and north-west of the subject lands) have been zoned for economic development.
- The Ancillary Related Airside Services uses which are proposed at Dublin Airport which includes *inter alia* long-stay parking, taxi, feeder park, car hire, staff parking and logistics. These lands are located in close proximity to the subject lands and
- The existing builder's yard and steel stockholding enterprise to the north and adjoining Green Belt lands.

Finally, it is considered that the rezoning of the subject lands as 'WD' and its subsequent development in the manner required by Killeen (subject to the securing of the appropriate planning consent) would be consistent with the proper planning and sustainable development of this strategically located land bank. **Therefore, our client would respectfully request Fingal County Council to rezone the subject lands at Newtown, Kilshane Cross, Dublin 11 as 'WD' Warehouse and Distribution.**