

Dublin City Council,  
Planning Department,  
Civic Offices,  
Wood Quay,  
Dublin 8

DCC PLAN NO. 2048/18  
RECEIVED 11 JAN 18

11<sup>th</sup> January 2018

Dear Sir / Madam,

**RE: PLANNING APPLICATION IN RESPECT OF A PROPOSED TEMPORARY CAR PARK ON A SITE AT BROOKFIELD ROAD, KILMAINHAM, DUBLIN 8**

**1.0 INTRODUCTION**

1.1 On behalf of the applicant, Brookfield Property Limited, please find enclosed a planning application in respect of a proposed development at the former Fodhla Printing Works site, Brookfield Road, Kilmmainham, Dublin 8.

1.2 The proposed development will consist of the construction of a temporary surface level car park for contractors/construction staff associated with the construction of the new National Children's Hospital within the grounds of St. James' Hospital campus. The car park comprises a total of 75 no. spaces for a temporary period up to a maximum of three years and will be accessed from Brookfield Road. The proposal includes all associated site works.

1.3 The planning rationale for the proposed temporary car park can be summarised as follows:

- 'Car Park' use is permitted in principle under the Z6 zoning objective pertaining to the site;
- The proposal to provide a temporary surface level car park supports the development of the new National Children's Hospital, which is located to the south east, during the construction period and is only for the use of contractor / construction staff workers;
- In the interim period, and during the construction phase of the Hospital, the applicant has engaged a design team to bring forward a revised redevelopment proposal for the site, which will supersede Reg. Ref.: 4179/15 & ABP PL29S.247001, and provide a viable development proposal for the site;
- Section 6.5.4 of the County Development Plan notes that Dublin City Council look positively on appropriate temporary uses as interim solutions for vacant land and therefore the proposal for a temporary car park in advance of the revised redevelopment proposal is considered appropriate;
- The proposal for a temporary car park also accords with Policy CEE16(v) which supports the temporary use of vacant sites;

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- The proposal for a temporary car park accords with Policy MT21 by mitigating the impact of construction parking associated with the construction of the National Children's Hospital including nuisance and illegal parking;
- The proposed temporary car park will protect the residential amenity of the surrounding neighbourhoods by providing centralised, segregated and secure parking facilities for construction workers;
- The proposed temporary car park will contribute to preventing illegal or nuisance parking in the vicinity of St. James' Campus which might otherwise cause inconvenience and annoyance to local residents.
- We note that a significant number of parking spaces at St. James' Campus have been removed or re-allocated for the New Children's Hospital and there is not enough overflow parking spaces to cater for construction workers during the construction period. It is considered that the proposal for a temporary car park for construction staff in close proximity will make a positive contribution to alleviating the parking constraints at St. James' campus.

1.4 The following documentation is submitted in support of the proposed development:

- A copy of the Site Notice and original Newspaper Notice;
- Completed planning application form;
- Planning application fee of €123.85 made payable to Dublin City Council;
- 6 no. copies of this cover letter;
- 6 no. copies of drawings and schedule of drawings prepared by Cronin & Sutton Consulting Engineers;
- 6 no. copies of the Engineering Services Report prepared by Cronin & Sutton Consulting Engineers.

## 2.0 SITE LOCATION AND CONTEXT

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- 2.1 The subject site is located on the eastern side of Brookfield Road, south of Kilmainham Road (R810) and less than 300m north of South Circular Road. The subject site is located less than 500 metres from the Rialto Red Luas Line stop. We note that Brookfield Road is effectively restricted to one-way traffic as access from Old Kilmainham Road is not permitted.
- 2.2 The site is brownfield in nature and does not contain any existing buildings as illustrated in Figure 1 below. The proximity of the subject site to the New Children's Hospital within St. James' Campus is illustrated in Figure 1 and 2 below. Access to the construction site for the National Children's Hospital is located approximately 140 metres to the south of the proposed temporary car.

**Figure 1: Site (red indicative only) in context to National Children's Hospital**



**Figure 2: Site Location (red line indicative only)**



**3.0 PLANNING HISTORY**

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3.1 The subject site has an extensive planning history, however, no recent permissions have been implemented to date. We note that the subject site was registered on the Vacant Sites Register under Ref.: VS-0002 on the 31<sup>st</sup> March 2017. The extant permission on the subject site is outlined below.

*Reg. Ref.: 4179/15 & ABP Ref.: PL29S.247001*

3.2 The site has an extant permission for a mixed use development under Reg. Ref.: 4179/15 and ABP Ref.: PL29S.247001 comprising c. 1,971 sq.m (GFA) of office floorspace and 14 no. residential dwellings as illustrated in Figure 3 below. This permission has not been implemented to date.

**Figure 3: Images of the extant permission under Reg. Ref.: 4179/15 and ABP Ref.: PL29S.247001**



*Context*

- 3.3 Our client purchased the site with the benefit of the above permission. However, following detailed review of the scheme and in particular the quantum of office floorspace proposed in this location, they have advised that the development is not viable at present.
- 3.4 The subject application for a temporary car park is brought forward, at this time, to facilitate the contractors / construction workers associated with the construction of the New Children's Hospital, due to open in 2021, and will help protect the residential amenity of the surrounding neighbourhoods during the construction period by alleviating the need for parking.
- 3.5 In the interim the applicant has engaged an experienced design team to bring forward a revised development proposal for the site which will provide a viable scheme and seek to meet the emerging requirements of the hospital in this area, as per the new City Development Plan.

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**4.0 PRE-APPLICATION CONSULTATION**

- 4.1 Prior to lodgement of this planning application, Cronin & Sutton Consulting Engineers engaged in 1 no. pre-application meeting with Dublin City Council Environment and Transportation Department on the 19<sup>th</sup> October 2017, to discuss the development proposal. The meeting was attended by Edel Kelly of the DCC Environment and Transportation Department and Niall Barrett, C&SC, on behalf of the applicant.
- 4.2 There was no objection in principle to the proposed temporary car park at this location, however, it was noted that any such scheme must be justified in the context of the City Development Plan. The Transport Department emphasised that the proposal must be for a limited time period and will only service the contractors / construction staff of the New Children's Hospital.
- 4.3 As outlined in the following section, the proposed surface level car park comprising 75 no. spaces will be for the use of contractor / construction staff workers and is only to be used for a temporary period up to a maximum of three years from implementation.

**5.0 PROPOSED DEVELOPMENT**

- 5.1 The proposed development will consist of the construction of a temporary surface level car park for contractors/construction staff associated with the construction of the new National Children's Hospital within the grounds of St. James' Hospital campus. The car park comprises a total of 75 no. spaces for a temporary period up to a maximum of three years and will be accessed from Brookfield Road.
- 5.2 It is proposed to utilise the existing vehicular access to the site at the location of the existing access gate. The proposed access is 5m in width allowing simultaneous entry and exit of vehicles. The development provides for unobstructed sightlines of at least 25metres in either direction along Brookfield Road for vehicles exiting the development. We note that this exceeds the required sightline distance of 23m (DMURS). The proposed access is positioned along the section of road that operates as a two way road. We note that immediately north of the development access operates as a one-way system as access to Brookfield Road from Old Kilmainham is not permitted.

- 5.3 It is considered that the proposed temporary car park development will help protect the residential amenity of the surrounding neighbourhoods by providing centralised, segregated and secure parking facilities for construction workers. It is submitted that the proposed temporary car park will contribute to preventing illegal or nuisance parking associated with construction workers in the vicinity of St. James' Campus which might otherwise cause inconvenience and annoyance to local residents.
- 5.4 As outlined above, following completion of the Children's Hospital, it is intended that the site will cease being used for car parking and at that time the applicant will have secured a new permission for a revised redevelopment scheme for the site which accords with the City Development Plan 2016-2022, and can be implemented at that point.

*Drainage / Flood Risk Assessment*

- 5.5 We refer the Planning Authority to the Engineering Services Report prepared by Cronin & Sutton Consulting Engineers which details the proposed storm water drainage and flood risk assessment for the proposed temporary car park.

**6.0 PLANNING POLICY CONTEXT**

- 6.1 The application site is located within the administrative boundary of Dublin City Council and is subject to the policies and objectives of the 2016 to 2022 Dublin City Development Plan. The following set out and assesses the proposed development of a temporary car park in the context of relevant policies, objectives and standards of the Dublin City Development Plan.

*Land Use Zoning*

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- 6.2 The subject site is zoned Z6 which seeks 'To provide for the creation and protection of enterprise and facilitate opportunities for employment creation'. An extract of the zoning map is indicated in Figure 5. The site is located within a zone of Archaeological Interest.
- 6.3 We note that 'Car Park' is included as a permissible use under the Z6 zoning objective and therefore the principle of the proposed development for temporary car park is considered acceptable.

**Figure 5: Land Use Zoning Extract**



- 6.4 The site is located within the designated Strategic Development Regeneration Area of St. James Hospital Campus and Environs (SDRA15) which has a specific objective “to promote investment in the local area to provide new affordable homes and amenities for staff and a training centre for healthcare workers.” The proposal for a temporary car park will support the development of the National Children’s Hospital, on a temporary basis during the construction phase, and provide much needed parking for construction staff in close proximity to the construction site. It is considered that the proposed temporary car park mitigates the impact of construction works including illegal or nuisance parking associated with construction staff in the vicinity of St. James’ Campus which would cause inconvenience and annoyance to local residents.
- 6.5 In addition, under SDRA15, the site is identified under the key development principle ‘Western Approach’, which seeks to “Facilitate development on Old Kilmainham Road, improving the quality and image of this main vehicular approach to the hospital. The provision of affordable homes for hospital staff will be encouraged, where feasible.” The site is considered a suitable location for the use of a temporary car park as the ‘main vehicular approach to the hospital’ for contractors / construction workers associated with the construction of the New National Children’s Hospital within the grounds of St. James’ Campus.
- 6.6 In the interim the applicant intends to bring forward a revised redevelopment proposal for the site, which can be implemented following completion of the hospital construction process. We note that under Section 6.5.4 of the Development Plan, Dublin City Council look positively on appropriate temporary uses as interim solutions for vacant land. It is therefore considered that the proposal for a temporary car park in advance of the revised redevelopment proposal being implemented is considered appropriate.
- 6.7 The proposed temporary car park is also considered to accord with the following policies of the Development Plan:
- Policy CEE16 (v) – “To promote and facilitate the use, **including the temporary use**, of vacant commercial space and vacant sites, for a wide range of enterprise including cultural uses, and which would comply with the proper planning and sustainable development of the area and the provisions of the development plan.”
- Policy MT21 – “To improve the management and control of traffic in the city, to increase internal and external sustainable accessibility, to improve road safety, to safeguard commercial serving requirements, **to mitigate the impact of construction works** and to minimize the adverse environmental impacts of the transport system”
- 6.8 As the subject site is a brownfield site and registered on the Vacant Site Register under Ref. VS-002, it is considered that the proposed temporary use of a car park at this location is appropriate for the duration of the construction of the National Children’s Hospital.

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**7.0 CONCLUSION**

- 7.1 On behalf of the applicant, Brookfield Property Limited, we hereby apply for planning permission for development at the former Fodhla Printing Works site, Brookfield Road, Kilmainham, Dublin 8.

- 7.2 The proposed development will consist of the construction of a temporary surface level car park for contractors/construction staff associated with the construction of the new National Children's Hospital within the grounds of St. James' Hospital campus. The temporary car park comprises a total of 75 no. spaces for a limited period up to a maximum of three years and will be accessed from Brookfield Road.
- 7.3 The planning rationale for the proposed temporary car park can be summarised as follows:
- 'Car Park' use is permitted in principle under the Z6 zoning objective pertaining to the site;
  - The proposal to provide a temporary surface level car park supports the development of the new National Children's Hospital, which is located to the south east, during the construction period and is only for the use of contractor / construction staff workers;
  - In the interim period, and during the construction phase of the Hospital, the applicant has engaged a design team to bring forward a revised redevelopment proposal for the site, which will supersede Reg. Ref.: 4179/15 & ABP PL29S.247001, and provide a viable development proposal for the site;
  - Section 6.5.4 of the County Development Plan notes that Dublin City Council look positively on appropriate temporary uses as interim solutions for vacant land and therefore the proposal for a temporary car park in advance of the revised redevelopment proposal is considered appropriate;
  - The proposal for a temporary car park also accords with Policy CEE16(v) which supports the temporary use of vacant sites;
  - The proposal for a temporary car park accords with Policy MT21 by mitigating the impact of construction parking associated with the construction of the National Children's Hospital including nuisance and illegal parking;
  - The proposed temporary car park will protect the residential amenity of the surrounding neighbourhoods by providing centralised, segregated and secure parking facilities for construction workers;
  - The proposed temporary car park will contribute to preventing illegal or nuisance parking in the vicinity of St. James' Campus which might otherwise cause inconvenience and annoyance to local residents.
  - We note that a significant number of parking spaces at St. James' Campus have been removed or re-allocated for the New Children's Hospital and there is not enough overflow parking spaces to cater for construction workers during the construction period. It is considered that the proposal for a temporary car park for construction staff in close proximity will make a positive contribution to alleviating the parking constraints at St. James' campus.
- 7.4 Please do not hesitate to contact us if you require any additional information or clarification on the documentation submitted.

Yours sincerely,



**John Spain Associates**

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