

Forward/Strategic Planning
South Dublin County Council
County Hall Tallaght,
Dublin
D24 A3XC

14th September 2021

RE: Submission to the Draft South Dublin Development Plan 2022-2028

Dear Sir/Madam,

We make this submission to draft Limerick Development Plan 2022-2028 on behalf of our clients, Circle K Ireland Energy Group Limited, Circle K House, Beech Hill, Clonskeagh, Dublin 4, and in relation to their existing service station on Naas Road in Dublin City.

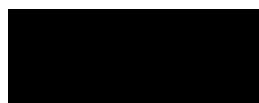
The submission is supportive of the proposed zoning of the Cranley Service Station as an area for 'Regeneration', which more properly reflects its long established and permitted commercial use as a service station fulfilling a local service function to the adjoining community, while also potentially allowing for future development.

We respectfully ask that the points made herein are reflected in the new Development Plan.

The submission is set out hereunder in detail. It is trusted that it will be seen as a constructive and productive contribution to the preparation of the final Plan, and, in this regard, we request that it is given favourable consideration.

Please forward all correspondence in relation to this submission to this office.

Yours sincerely,



Cathal Costello
Coakley O'Neill Town Planning Ltd.

1.0 Circle K Cranley Service Station

1.1 The subject service station site is 0.4ha in area and is located on the southern side the Naas Road East, a busy distributor road west of Dublin City Centre, and close to the suburbs of Ballymount, Drimnagh and Clondalkin. It comprises a single storey services building, located to the eastern end of the site with forecourt area with canopy over. A McDonalds adjoins the service building to the west with a car sales showroom to the east. These units share two entrances onto the Naas Road.



Figure 1: Site Location (site generally outlined in red, MyPlan annotated Coakley O'Neill)

1.2 There are four pump islands under the canopy with car parking, car wash and ancillary service bay and services. The site has two entrances onto the Naas Road. There is a large monolith sign located at the western entrance. A standalone carwash facility is located to the west of the services building, alongside it is an air and water service area.

1.3 The site is an established commercial business operating as a service station and located in a predominately commercial and industrial area. While the character of land uses in the immediate vicinity is mainly retail, commercial and industrial there are some residential uses and amenities nearby.

1.4 There has been a service station on the subject site for many years. The established local service function use of the service station is evident, and it will continue to serve to the local needs of the surrounding population.

Discussion and Submission

- 1.5 The service station is proposed to be zoned as an area for 'Regeneration' in the Draft Plan.
- 1.6 This approach is fully endorsed by our clients and can be found to be in accordance with the guidance set out in national planning policies for the proper development of retail uses within such zonings.



Figure 2: Proposed Site Zoning (site generally outlined in red, Draft Limerick Development Plan annotated Coakley O'Neill)

- 1.7 The proposed zoning also more properly reflects the site's long established and permitted commercial and retail use. It will allow for the expansion of such uses in principle should they be deemed in accordance with the proper planning and sustainable development of the local area.
- 1.8 In addition, this zoning creates a plan-led approach towards promoting town centre vitality through the sequential approach to development. It will enable good quality development in appropriate locations, facilitate modal shift and will deliver quality design outcomes.
- 1.9 Furthermore, it places an appropriate emphasis on the regeneration and intensification of existing developed lands, improved public realm and provision of sustainable employment generating uses.
- 1.10 It must also be acknowledged that the service station, not only forms part of the retail resource of the city but is located in an area where its primary function is to serve the local needs of the surrounding population.
- 1.11 The proposed rezoning also fully aligns with the following requirements on Planning Authorities when they are preparing new development plans, as set out in the Retail Planning Guidelines, 2012

2. Outline **the level and form of retailing activity appropriate** to the various components of the settlement hierarchy in that core strategy; see district centres below;

3. Define, by way of a map, the **boundaries of the core shopping areas** of city and town centres and also location of any district centres (See Section 3.4);

6. **Identify sites which can accommodate the needs of modern retail formats** in a way that maintains the essential character of the shopping area;

1.12 Circle K design and manage their sites to the highest standards in terms of customer expectation and health and safety. Sites are operated and developed with accessibility, sustainability and safety in mind and comply with all statutory regulations. Buildings are designed to a high architectural standard.

1.13 Service stations uses are continuing to grow and expand. It is now common practice for convenience food stores, whether at service stations or not, to increase their services as part of their product offering. The current zoning of the site does reflect the uses at the site and does allow for any reasonable expansion or future growth in line with the current use.

1.14 In this regard, the proposed zoning objective is important to our clients as it allows for future flexibility to operate, change, and expand, as necessary. A failure of the planning process to allow our clients this flexibility would be anti-competitive.

1.15 On all these grounds, this service station site presents a strong credible case for the zoning designation that allows for the continued operation of the existing permitted service station use, something which is directly achieved by the proposed Regeneration zoning in the Draft Plan.

1.16 Our clients therefore fully endorse the proposed zoning and this submission requests maintaining the proposed zoning at Circle K Cranley Service Station in light of the strong and sustained planning merits pertaining to its current use for a range of such uses.