

South Dublin County Council,
Land Use, Economic and Transport Planning Department,
County Hall,
Tallaght,
Dublin 24.

6th April 2022

Dear Sir / Madam,

RE: PLANNING APPLICATION FOR WAREHOUSING / LOGISTICS, OFFICE AND CAFÉ / RESTAURANT DEVELOPMENT AT CALMOUNT ROAD AND BALLYMOUNT AVENUE, BALLYMOUNT INDUSTRIAL ESTATE, DUBLIN 12

Introduction

On behalf of the applicant, Blackwin Limited, we hereby enclose a planning application for a proposed development comprising 5 no. warehousing / logistics units including ancillary office floorspace, 3 no. own door office buildings, 1 no. café / restaurant unit and all associated development at Calmount Road and Ballymount Avenue, Ballymount Industrial Estate, Dublin 12. The application site is a vacant, greenfield and underutilised site (with an application site area of c. 7.45 ha, including 7.11 ha within the applicant's control, i.e. excluding works on the public road included within the red line boundary) within the Ballymount Industrial Estate area. Ballymount Avenue is located along the eastern boundary and Calmount Road along the southern boundary. The site is surrounded by existing employment and enterprise uses, including Galco Steel site to the north.

Development Description

The proposed development consists of the following:

- Construction of 5 no. warehouse / logistics units (Units 1, 2 3, 4 and 6), including ancillary office use and entrance / reception areas over two levels, with maximum heights of c. 17.09 metres and a combined total gross floor area (GFA) of 20,158 sq.m;
- Each warehouse / logistics unit includes car parking to the front, and service yards, including HGV loading bays, to the rear of each unit. Signage zones are proposed for each unit. A total of 200 no. car parking spaces and 110 no. cycle spaces are provided for the 5 no. warehouse / logistics units;
- Construction of 3 no. 3 storey own-door office buildings (Block 5A, 5B and 5C) with maximum heights of c. 13.45 metres and a combined GFA of 4,194 sq.m. Signage zones are proposed at the entrances to the buildings. A total of 77 no. car parking spaces, 50 no. cycle parking spaces and a bin storage area are provided for the proposed office buildings;
- Construction of a café/restaurant unit with a maximum height of c. 6.09 metres and a GFA of 213 sq.m to be located in the south western section of the site. The proposal

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- includes signage for the unit, associated outdoor seating and a bin store. 14 no. car parking spaces and 10 no. cycle spaces are provided for the café/restaurant unit;
- The proposal includes 5 no. ESB substation buildings;
 - The development is to be accessed off Ballymount Avenue and Calmount Road and includes for alterations and upgrades to the public footpaths and road. The development provides for vehicular and service access points, associated internal access roads, circulation areas and footpaths; and
 - The proposal includes landscaping and planting, entrance signage, boundary treatments, lighting, PV panels, green roofs, underground foul and storm water drainage network, including connections to the foul and surface water drainage network on the public roads, attenuation areas and all associated site works and development.

Applicant

The applicant, Blackwin Limited, is a Park Developments company, who are an experienced developer in the warehouse / logistics and office sector in Dublin. Park Developments have similarly scaled warehouse and logistics development underway at Northwest Logistics Park in Fingal and are working with a number of operators who have interest in similar floorspace in this prime location in South Dublin. Please refer to Appendix 2 of the Planning Report for further details on the applicant and the background to the proposals for the subject site.

As the Planning Authority will be aware, there has been an increased demand for large warehouse / logistics units in recent years and this is projected to continue. The applicant is also experienced in delivering office developments, with the established office scheme at The Park, Carrickmines and the own-door offices at Leopardstown Valley Shopping Centre, of most relevance to the own-door office proposals contained within the subject application.

Pre-Application Consultation

The proposal has been subject to 1 no. formal pre-application meeting with the Planning Authority on the 25th of January 2022. The meeting was attended by Eoin Burke and Conor Doyle (DM Planning Department), Siobhan Duff and James Phelan (DM Forward Planning), Graham Murphy and John Joe Hegarty (Transport), Brian Harkin (Drainage), Oisin Egan (Parks) and Ronan Toft. In addition, follow-up discussions were undertaken with the relevant Departments prior to lodgement of the application, as significant revisions have been made in response to the feedback received at the first meeting.

As detailed in Section 3 of the Planning Report, the proposed development, as submitted for approval, has been significantly revised in response to the comments received in the pre-application consultation, including the introduction of office floorspace and public realm improvements along Calmount Road and Ballymount Avenue.

The proposals as submitted are considered to be consistent with the EE zoning objective and the requirements of the South Dublin County Development Plan 2016-2022, i.e. the statutory plan for the area. However, the alterations made following the first pre-application meeting has regard to the long-term objectives for this part of the County as referenced in the preliminary public consultation on the City Edge project (currently a non-statutory process / plan).

Summary of Planning Policy Justification

As set out in detail in the accompanying Planning Report prepared by John Spain Associates, the proposed development is considered appropriate for the subject site for the following reasons:

- The subject site is zoned for Enterprise and Employment use (EE) in the County Development Plan (CDP hereafter) 2016-2022. The land use zoning objective is *'to provide for enterprise and employment related uses'*. The proposal for warehousing / logistics units, own-door office buildings and a café / restaurant unit on the site is considered acceptable given that all these uses are permitted in principle / open for consideration under the EE zoning objective and they will deliver on the objective to provide 'enterprise' and 'employment' uses on such lands.
- The site is subject to a long-term road objective from Calmount Road northwards, which the proposed development will deliver on the western part of the site from Calmount Road to the northern site boundary.
- The proposed mix of uses has regard to the EE zoning objective, the surrounding pattern of development and the longer term objectives for the regeneration and redevelopment of the Naas Road and Ballymount area of South Dublin. The scheme will deliver a high quality development with active frontages, good quality public realm and well considered architectural treatment to the key frontages.
- The CDP advises that Enterprise and Employment (EE) zoned lands will accommodate low to medium intensity enterprise and employment uses. Given the location of the subject site within the established Ballymount Industrial Estate area, it is considered the site is suitable primarily for warehouse and logistics-based uses, with an element of own-door office floorspace on the corner with Calmount Road and Ballymount Avenue, to reflect the prominence of this part of the site and existing and planned public transport improvements in the area. The proposed development will make a positive contribution to the area and can deliver large scale warehouse / logistic facilities and own-door office uses in the short to medium term, given the significant market demand for such uses in this location.
- The proposal also accords with ET3 Objective 4 of the CDP which directs such uses to enterprise and employment zoned lands proximate to the strategic and national road network, given that the subject lands are strategically located in proximity to the M50 and the wider national motorway network which the M50 connects to.
- The design team have prepared the proposals to accord with the requirements of Table 11.18 of the CDP in respect to the development of Enterprise and Employment zoned lands as reflected in the site layout and built form / design, access and movement, open space and landscaping proposals for the site.
- The subject site does not form part of the regeneration area (Objective REGEN zoned lands) identified in the current CDP for a Local Area Plan. It is noted that the CDP as originally adopted required the preparation of a masterplan and Ballymount LAP for lands zoned REGEN, EE, and LC under

CS6 SLO1. However, this was subsequently amended under Variation 3 of the CDP adopted in May 2019 to require the preparation of a masterplan, with a view to progressing a LAP, for the REGEN zoned lands only.

- While it is recognised that the subject site falls within the 'City Edge Project' lands, the adopted Development Plan does not preclude development at this location pending the preparation of a framework or Local Area Plan. The Statutory Framework for the City Edge Project has not yet been confirmed and there is currently no stated timeframe or mechanism in place for the completion of the Strategic Framework or the subsequent 'plan making' process for the City Edge Project area. Therefore, given the current land use zoning objective, the existing surrounding context, and the fact that the subject site does not fall within the Naas Road / Ballymount REGEN zoned lands subject to a requirement for an LAP, it is respectfully submitted that the proposed development is consistent with the planning policy framework set down under the CDP, under which the application will be assessed, and cannot be considered premature.
- The proposed development, as submitted for approval, has been significantly revised following a pre-application consultation with the Planning Authority and further review of the Development Plan requirements, and now includes own-door office units, a café/restaurant unit and public realm works to provide for active frontage and an urban street environment. This is to be cognisant of the long-term objectives for this part of the County as referenced in the CityEdge project (a non-statutory plan).
- The proposed development also accords with national and regional planning policy, with the National Planning Framework encouraging employment growth and setting out (NPO2a) that *'a target of half of future population and employment growth will be focused in the existing five Cities and their suburbs'*. In relation to the Eastern and Midlands Regional Assembly, Regional Spatial and Economic Strategy, the subject site is located within the MASP which includes for increased employment density within the Dublin City and suburbs.
- Overall, it is considered that the proposed development will make a positive contribution to the area and can deliver large scale warehouse / logistic facilities and own-door office floorspace, with an ancillary café / restaurant use to cater for the daily needs of employees in the area, and deliver a high-quality built environment, and therefore accord with the proper planning and sustainable development of the area.

Enclosures

The planning application includes a comprehensive set of documentation and information to ensure all relevant planning matters are addressed. In accordance with the requirements of the Planning and Development Regulations 2001-2021, 6 no. copies of the application documentation have been submitted, along with 1 no. copy on disc.

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

- A copy of the Site Notice, an original copy of the Newspaper Notice, the Planning Application Form and attachments, including confirmation of the planning application fee having been paid by EFT to South Dublin County Council;
- 6 no. copies of this Cover Letter prepared by John Spain Associates;
- 6 no. copies of a Planning Report prepared by John Spain Associates;
- 6 no. copies of Architectural Drawings, Schedule of Accommodation, Schedule of Drawings, Design Statement and CGI 'Artists Impressions' Brochure prepared by TOT Architects;
- 6 no. copies of Engineering Drawings and Schedule prepared by DBFL Consulting Engineers;
- 6 no. copies of an Engineering Services Report prepared by DBFL Consulting Engineers;
- 6 no. copies of a Site-Specific Flood Risk Assessment Report prepared by DBFL Consulting Engineers;
- 6 no. copies of a Preliminary Construction and Environmental Management Plan prepared by DBFL Consulting Engineers;
- 6 no. copies of a Traffic and Transportation Assessment Report and Mobility Management Plan prepared by DBFL Consulting;
- 6 no. copies of Landscape Drawings, Schedule and Landscape Architect's Report prepared by Murray & Associates;
- 6 no. copies of a Description of Proposed Utilities and Energy & Sustainability Report, Site Lighting Report, M&E Drawings and Schedule prepared by PMEP Consulting;
- 6 no. copies of an Outline Construction and Demolition Waste Management Plan prepared by Enviroguide;
- 6 no. copies of Ecological Impact Assessment prepared by Enviroguide;
- 6 no. copies of an AA Screening Report prepared by Enviroguide;
- 6 no. copies of an Archaeological Impact Assessment Report prepared by Courtney Deery; and
- 1 no. soft copy on CD ROM.

We trust that the documentation as submitted meets the requirements of the Planning Authority.

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

Yours faithfully,



John Spain Associates