Armstrong Planning

ADDITIONAL INFORMATION

pertaining to

SDCC Ref: SD21A/0347 – Paint Workshop Extension with Canopy

at

Galco House, Ballymount Road, Walkinstown, Dublin 12

on behalf of

Galco Steel Limited

19th April 2022

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Introduction

Armstrong Planning (with offices at 12 Clarinda Park North, Dun Laoghaire, Co. Dublin, A96 V6F9) have been retained by Galco Steel Limited (the applicant) to prepare this 'Additional Information' in response to the Council's Request for Additional Information – which was issued on 21/02/2022 – in relation to our application (SDCC Ref: SD21A/0347) at Galco House, Ballymount Road, Walkinstown, Dublin 12 (the application site) for the proposed development comprising:

> *Construction of a single storey extension (980sqm) to paint workshop with canopy; two access doors with roller shutters and all associated site development works*

Additional Information Requested

Additional Information was requested with respect to three items. Our response comprises six copies of this statement, which deals with each item in turn, and six copies of the following documentation, attached herewith:

- Stormwater Drainage & SuDS Design Report - *prepared by Downes Associates*
- Engineering Drawing Pack - *prepared by Downes Associates*
- Potential Routing of Council's Aspirational 'Long-Term Road Proposal' - *prepared by Arthur Gibney & Partners*

Item 1

The applicant is requested to submit

(i) a report showing the surface water attenuation calculations for the proposed development.

- *Show what attenuation in m3 is required and what is provided in m3.*
- *Include the site area, the area of different surface types such as, green roofs, buildings, roads, permeable paving, green areas in m2 and their respective run off coefficients.*
- *Show the SAAR (Standard Annual Average Rainfall) value and site-specific Met Eireann rainfall data.*
- *Show what surface after attenuation is provided and what is required in m3 for proposed development.*

(ii) All surface water should be attenuated by means of SuDs (Sustainable Drainage Systems) where possible. The applicant shall include SuDs as part of their development. Examples of such SuDs features are as follows but not limited to:

- *Permeable Paving*
- *Grasscrete*
- *Green Roofs*
- *Swales*
- *Tree pits*

- *Planter boxes,*
- *Other such SuDs*

If SuDs does not provide sufficient surface water attenuation, the applicant shall show in a drawing how surface water will be attenuated for the proposed development.

Response to Item 1

The existing site has a hard surface and is served by an existing underground private stormwater sewer drainage network which ultimately connects to the existing 450mm diameter public stormwater sewer along Ballymount Road Lower.

The proposed development, as submitted, posed nil-detriment compared to the existing situation. Notwithstanding this however, the applicant has employed the services of Downes Associates (consulting structural & civil engineers) who have engaged with the Council's drainage department and produced a report ('Stormwater Drainage & SuDS Design Report') showing water attenuation calculations, and which addresses each of the sub- components in Item 1(a).

The SuDS proposals include the introduction of new planterbox rain-gardens beneath each downpipe ultimately connected to a new 32.23m cu stormwater attenuation tank prior to discharging through a new flow control device. This will restrict flow to 2.0L/sec, the lower practical limit for a hydrobrake, which represents a considerable improvement on the existing situation. Please see the accompanying 'Stormwater Drainage & SuDS Design Report' and engineering drawing pack which are submitted as additional information.

Item 2

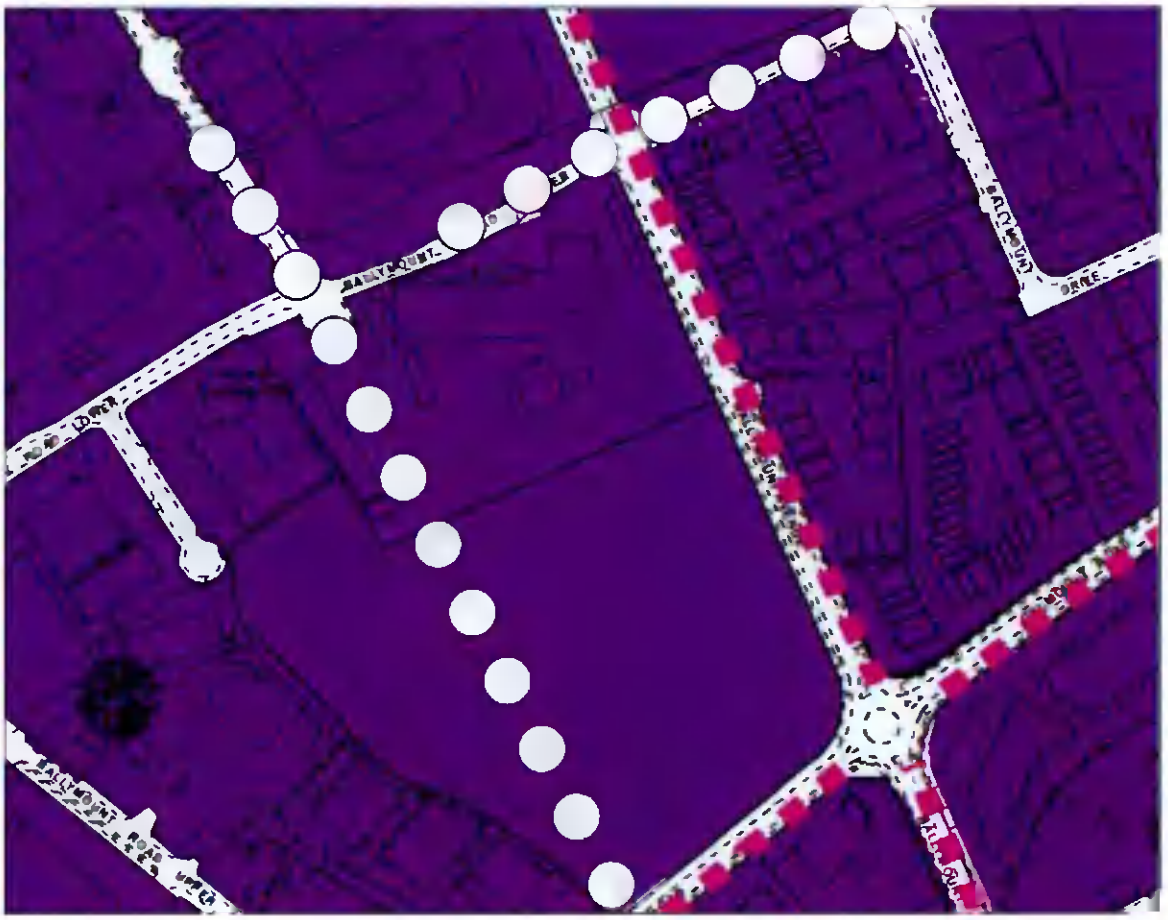
Having regard to the 'EE' zoning objective of the site, it is considered that the subject land use is acceptable in principle. However, within the current South Dublin County Council Development Plan, the application site along with the wider landholding is identified for the delivery of a long-term road proposal for the southern extension of the Merrywell Industrial Estate Road. In this regard, the applicant is requested to demonstrate that the proposed development would not prejudice the future delivery of the identified road extension. It is noted that this may require revisions to the design as currently proposed.

Prior to responding to the Additional Information request, the applicant is advised to liaise with the Roads Department of South Dublin County Council.

Response to Item 2

We note that the 'long-term' road proposal for the southern extension of the Merrywell Industrial Estate is shown traversing the Galco Steel site in a north-south direction, in line with the entrance to the Merrywell Industrial Estate and the Galco Steel entrance to the north, as per the extract from the Council's Development Plan Policies Map 2016-2022 in Fig. 1 below:

Fig. 1: Extract from SDCC Development Plan Zoning Map 2016-2022 showing 'long-term road proposal traversing the Galco Steel site'.

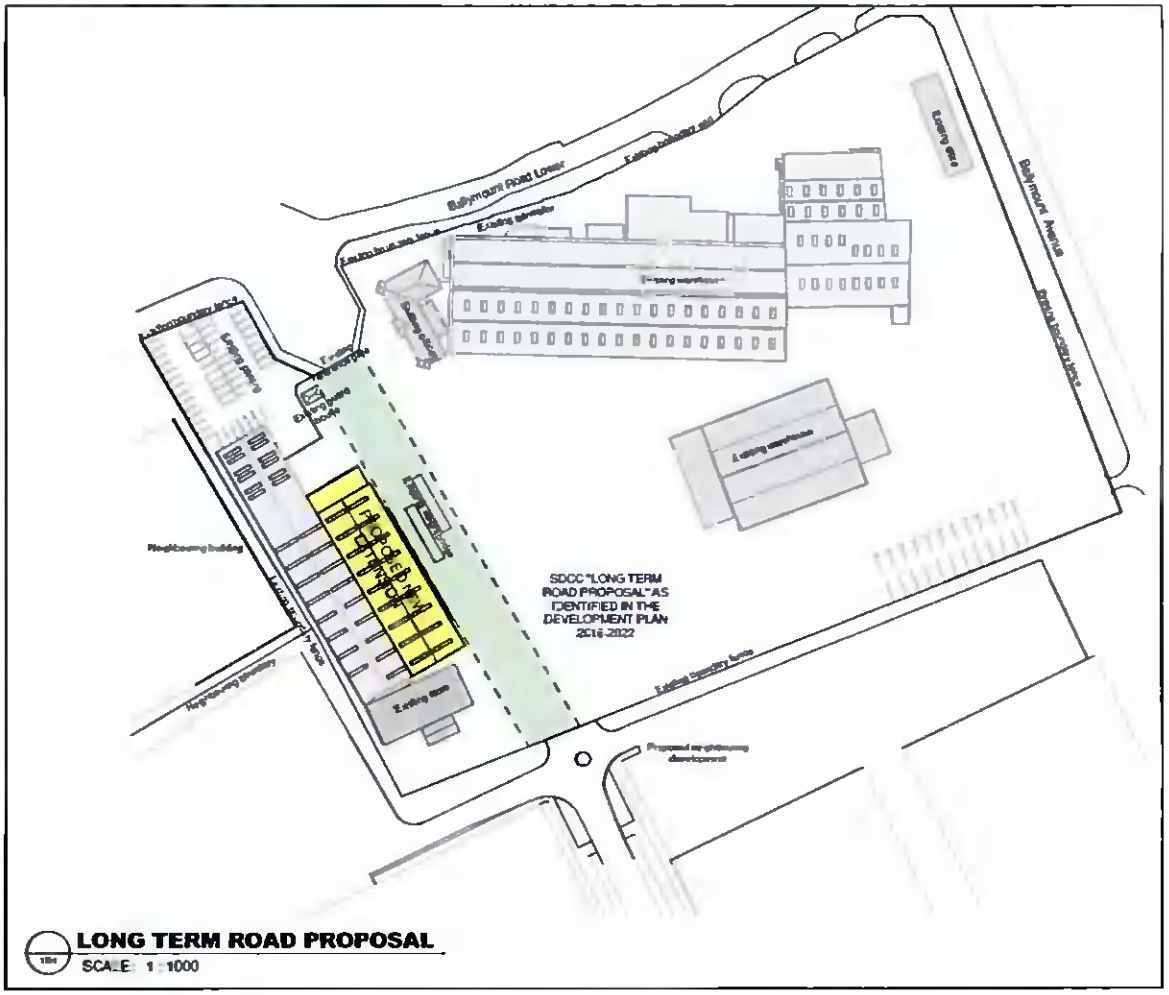


We note that this road proposal was first shown in its current form on the previous iteration of the South Dublin County Council Development Plan, 2010-2016. We note that the Draft County Development Plan also identifies this aspirational future road.

The applicant has concern about the location of this aspirational road which impacts not just the safe and efficient operation and future development potential of our client's lands, but indeed the viability of continued operations on the site. Over 100 HGVs per day use the existing entrance, supplying building sites across the country. The land within and surrounding the path of the road proposal is integral to the operation of the galvanising plant on site, with vehicle movements as well as the storage and manoeuvring of large steel components utilising the space between existing buildings on site where the road is proposed to run. The applicant would strongly resist any attempt to deliver this 'road proposal' due to the effect on their interests at this location.

It should be noted that the alignment of the 'road proposal' does not affect the proposed extension, skirting just to the east of the proposed structure (as per fig. 2 below). We are therefore of the opinion that the proposed development would not prejudice the future delivery of the identified road extension to any extent.

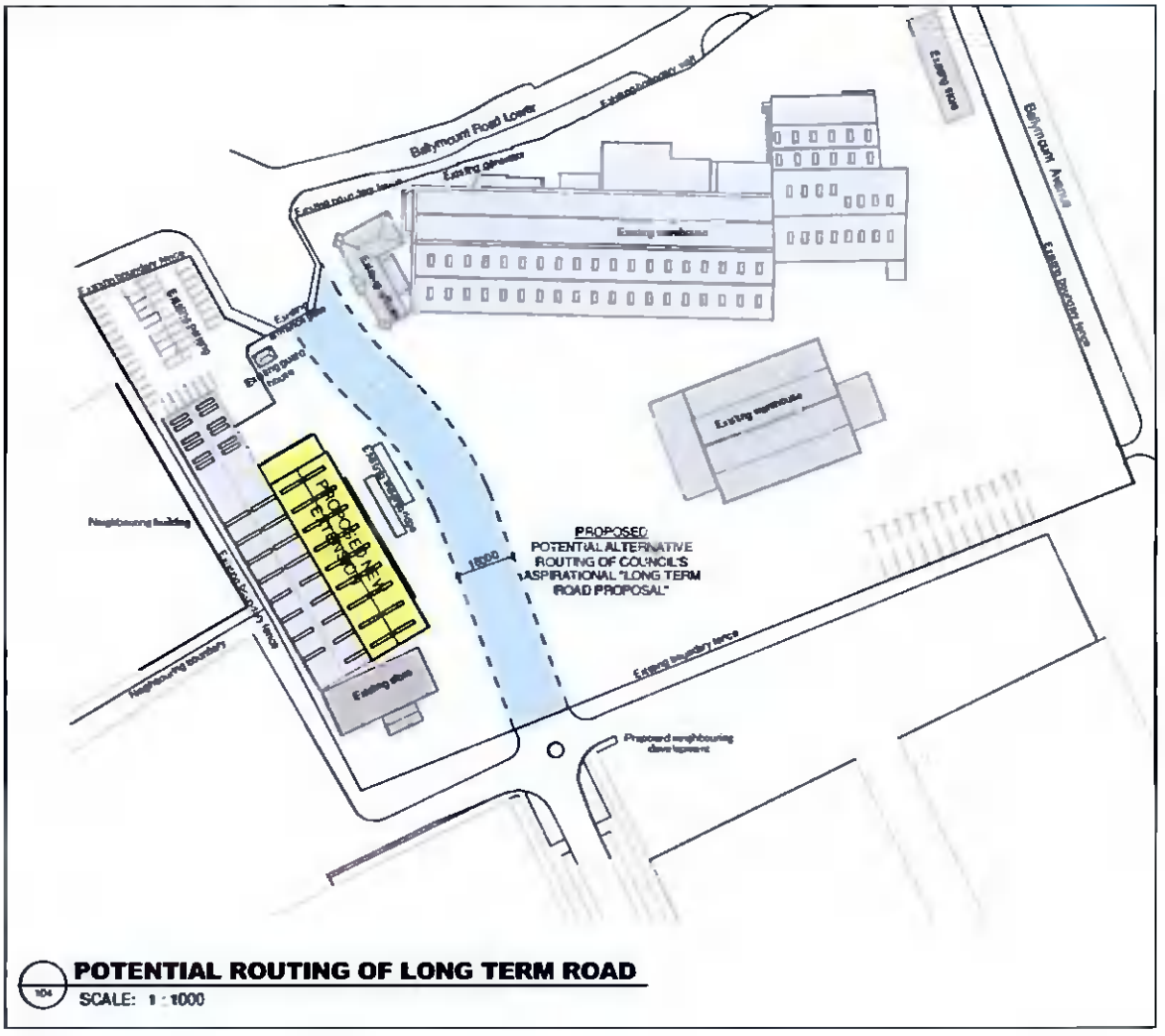
Fig. 2: Route of aspirational road proposal in the context of the proposed site layout with paint workshop extension marked in yellow.



However, the road proposal does inhibit both current operations and future development at the site, a situation which could be remedied by a minor realignment of the proposed road , while still connecting to the site entrance to the north (and therefore aligning with the entrance to the Merrywell Industrial Estate) potentially accommodating the desired north-south connectivity, as per the suggested alternative routing shown in Fig. 3 below.

The layout of the 'long-term road proposal' as identified on the Development Plan zoning map, and our illustration of a potential re-routing of this aspirational road proposal, are shown on the drawing (dwg 21.26-106 Rev1 prepared by Architects, Arthur Gibney & Partners) which is submitted with this response statement as Additional Information. We take pains to stress however, that the identification of such an alternative road layout on any drawing in no way represents any agreement on the part of the applicant, tacit or otherwise, to the prospect, design or purpose of such a road proposal. Rather, the exercise has been undertaken purely to illustrate that the proposed paint workshop extension in no way prejudices the Council's aspiration for north-south connectivity across the Galco Steel site.

Fig. 3: Potential re-routing of the Council's aspirational 'long-term road proposal'



In summary, we consider that the proposed road could be realigned so as to be compatible with the both the proposed development and the existing site layout to the advantage of all parties. Even if it is not realigned, it is still compatible with the proposed development. As such, we are of the view that no revisions to the design as currently proposed are necessary.

Item 3

> *The Planning Authority is currently unclear as to the exact use of the proposed structure and what processes are intended to be carried out within. Accordingly, the applicant is requested to provide details of the works that will be carried out within the proposed development, when operational, and outline any measures required to limit the discharge of odours or fumes associated with such works.*

Response to Item 3

The use of the proposed structure was described in the submitted Planning Statement in the following terms:

"The extension is required to provide a preparation area for the cleaning galvanised steel components to be treated prior to spray-painting. The size of the proposed extension has been dictated by the space and clearance area required to store components and manoeuvre large steel beams in and out of the paint workshop without exposure to the rain."

To clarify, the planning use of the structure will be the same use as wider Galco Steel Operation (which is a single planning unit) at the Ballymount Industrial Estate, i.e. Industrial use, where the principal activity on-site is the galvanising of steel components. The existing paint workshop on-site is where galvanised steel components are spray-painted prior to being loaded up for delivery. The main purpose of the paint workshop is to paint fire retardant paint i.e. Intumescent paint, to provide passive fire protection to steel structures. The process involves surface preparation where the steel is shot-blasted with small pellets, there are no fumes or odours released in this process. Cleaned steel is then transferred to the existing paint workshop where the intumescent paint is applied to a thickness required to ensure compliance with the fire rating specified for the job. In some cases, a topcoat is applied, depending the use area.

Presently shot-blasting is carried out is an adjacent temporary building (Tent Structure) and the steel is then transferred into the paint shop for application of the primer and Intumescent paint. The purpose of the building extension is to house the Shot Blast unit in an area that is adjacent and linked to the existing paint workshop. It will also enable storage of steel awaiting painting and the drying of painted steel which requires 24 hours at ambient temperature conditions to cure. In addition, it will allow storage of finished product undercover before collection by the customer. For operational reasons and to avoid weather conditions which can affect the quality and performance of the coating and the safe reliable transfer of steel this building needs to be linked and integrated to the paint workshop.

The proposed extension will provide additional environmental protections and controls associated with shot blasting process. After blasting, the steel sections are inspected by an operator to ensure that the surface of the steel is sufficiently cleaned. A surface profile test is carried out. There are no air emission points to atmosphere associated with this process.

Conclusion

We trust the information provided adequately meets the Council's request for Additional Information and we look forward to a decision on the matter in due course.

Prepared by

DAVID ARMSTRONG *BA MRUP MRTPI MIPI*