

Delivery Planning Report

Location:	Galco House, Ballymount Road, Walkinstown, Dublin 12
Register Reference No.:	SD21A/0347
Development:	Construction of a single storey extension (980sq.m) to paint workshop with canopy; two access doors with roller shutters and all associated site development works.
Application Type:	Permission
Report Date:	19/05/2022

REPORT ON FURTHER INFORMATION SUBMISSION

Introduction

This report has been drafted in response to a referral for comment from South Dublin County Council's Development Management Section.

The purpose of this report is to comment on further information received on the above application insofar as it relates to the City Edge Project. In order to provide an update since further information was requested on the subject application, details in relation to progress on the City Edge Project are included in the overview set out below.

Overview of City Edge Project:

The subject site falls within the boundary of the City Edge Project lands. The City Edge Project is a joint initiative between South Dublin County Council and Dublin City Council to create a new liveable, sustainable and climate resilient urban quarter at the western edge of the City. The project area covers 700 hectares of lands within the Naas Road, Ballymount and Park West areas and has the potential for 40,000 new homes and 75,000 jobs. This area is identified in the National Planning Framework (NPF) as a part of Dublin that is currently underutilised and has the potential to achieve Government policy in terms of compact growth, at scale.

A non-statutory Strategic Framework has been prepared jointly with Dublin City Council (DCC) to set out a high-level strategy for the regeneration of the City Edge area over the coming decades to 2070. -The Framework was informed by a detailed baseline study of the area; the outcome of public consultation carried out during September/October 2021; ongoing stakeholder engagement including with landowners, businesses, State agencies and service providers; and a series of background studies including housing, transport, economy and environmental reports. The Strategic Framework was noted at a meeting of South Dublin County Council on 9th May 2022 and will be put before the June meeting of Dublin City Council, also for noting.

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The purpose of the Strategic Framework is:

- To set out a high-level strategy for the regeneration of the City Edge area including an overarching vision, strategic objectives and spatial framework;
- To plan for the delivery of strategic infrastructure including streets, parks, public transport and utilities;
- To outline a series of priority actions in the areas of legislation, policy, funding and infrastructure to facilitate the future development of the City Edge area;
- To seek the support of government departments and state agencies including alignment of relevant policies and programmes and allocation of funding in order to deliver the City Edge vision;
- To provide a context for the preparation of a statutory plan which will set out more detailed guidance for the future development of the area.

On foot of the identification of the City Edge Lands within the South-Western Development Corridor under the MASP contained in the Eastern and Midland Regional Assembly's RSES (2019), the local policy impetus to prepare the Strategic Framework arises from objective CS6 SLO 1 contained within the Core Strategy of the current South Dublin County Development Plan, 2016-2022. While the Framework is a non-statutory document, the contents reflect the policies and objectives of the current Development Plan and the new Draft Development Plan 2022-2028, which will become operational later this year. The assessment set out below is made in that context. The Framework will be followed by a statutory plan, which is likely to comprise a transboundary plan prepared jointly with Dublin City Council.

Further to the purpose of the Strategic Framework to inform a statutory plan at the next stage of the City Edge Project, it is advised that the non-statutory Strategic Framework does not comprise a framework for development consent and should not be treated as such. It is important, however, that development is not deemed to be premature pending the preparation and adoption of such a statutory plan particularly with reference to the objectives and provisions contained in the South Dublin County Council Development Plan that are relevant to the City Edge Project.

Where appropriate, the Planning Delivery Team prepares a report to inform the assessment of planning applications within the boundary of the City Edge Project Area. The Delivery Team report has regard to the considerations and context set out above including the non-statutory nature of the Strategic Framework; the fact that it reflects Development Plan policies and objectives; and ensuring development is not premature pending the preparation of a statutory plan.

Proposal

The subject site relates to an industrial facility located at the intersection of Ballymount Road Lower and Ballymount Avenue. The proposal comprises an application for permission for the construction of a single storey extension (980sq.m) to paint workshop with canopy and two access doors with roller shutters and all associated site development works and remains largely unchanged under the further information response.

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The subject proposal was initially referred to the Planning Delivery Team for comment by the Development Management Section in February 2022 when the planning application was first received. The comment from the Planning Delivery Team was as follows:

‘The proposal consists of the development of a warehouse extension with dimensions 61m in length x 18m in width x 10m in height to the side of an existing warehouse. The development would comprise an increase of 980 square metres. While the principle of the expansion of an existing industrial use on an industrial site is acceptable, it is noted that it appears to be in an area that is identified for a long term road proposal in the 2016-2022 SDCC Development Plan. This may potentially impact on future proposals for the City Edge Project and movement within the area. Further details will be available when the Strategic Framework is finalised at the end of Q1 2022’.

The City Edge Project itself has progressed since further information was requested on the subject application. The Emerging Preferred Scenario has evolved into a Strategic Framework which was presented to the May 2022 South Dublin County Council Meeting for noting. The Strategic Framework provides a high level strategy for the development of the area up to 2070 in line with objectives set out in national guidance through the NPF and RSES.

The non-statutory Strategic Framework does not, however, represent a framework for development consent. As outlined above, the Framework will inform the statutory plan at the next stage of the City Edge Project. Identifying how the proposed development relates to future objectives of the City Edge Project contained within the Strategic Framework as per the further information request, is therefore no longer considered relevant or necessary.

Further Information Request

Further Information in relation to the subject application was requested on 21st February 2022 by South Dublin County Council. There were 3 items on the further information request and one of those items is considered relevant from the perspective of the City Edge Project. Item 2 reads as follows:

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’.

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Further Information Response

In response to the overall Further Information Request, the applicant submitted revised drawings together with a cover letter on 26th April 2022. The element of the cover letter that relates to Item 2 reads as follows:

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'.



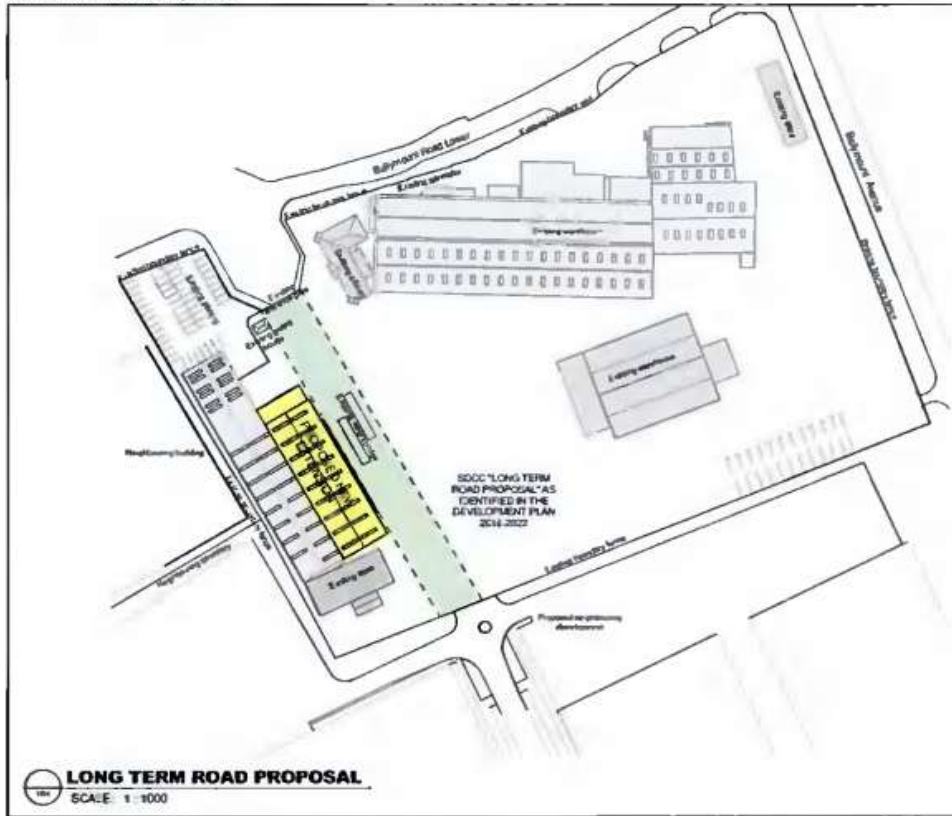
We note that this road proposal was first shown in its current form on the previous iteration of the South Dublin County Council Development Plan, 2010-2016. We note that the Draft County Development Plan also identifies this aspirational future road.

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.

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

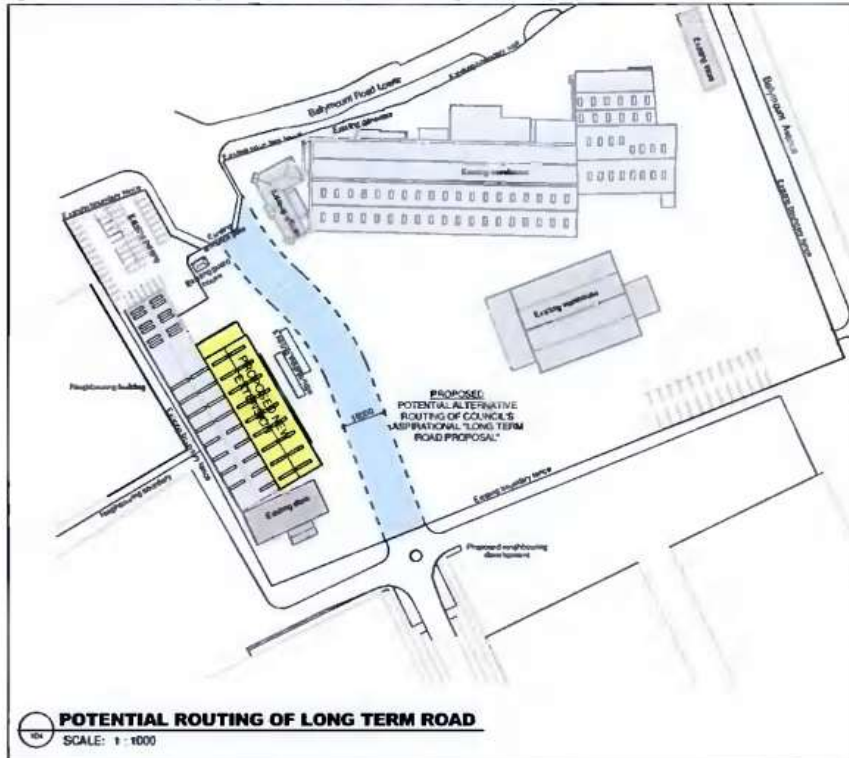


However, the road proposal does inhibit both current operations and future development at the site, a situation which could be remedied by a minor realignment of the proposed road, while still connecting to the site entrance to the north (and therefore aligning with the entrance to the Merrywell Industrial 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.

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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.

Further Information Assessment

Item 2

In response to the further information request, the applicants have sought to demonstrate how a section of the proposed road could be accommodated within the applicants' land holding. It should be noted that while the proposed road is identified as a long term road proposal in the current South Dublin County Development Plan, 2016-2022, it constitutes a six year road proposal in the Draft South Dublin County Development Plan, 2022-2028, meaning that it is now potentially a more imminent proposition.

With reference to Development Plan mapping as well as Table 6.6 (Long Term Roads Objective) and 7.5 (Six Year Road Programme) contained in current and Draft County Development Plans, respectively, the Planning Delivery Team advise that the subject Roads Objective is of potential importance from the perspective of helping to create a permeable street network that links Calmount Road with Ballymount Road Lower while aligning with the Merrywell Industrial Estate Road to the north of the application site.

The precise alignment, width (overall as well as carriageway, footpath and cycle way widths etc) and hierarchical positioning of the road (as per DMURS) is yet to be fully determined and is also yet to be investigated and detailed under a preliminary design. The two optional future road alignments that the applicant has suggested should therefore be treated as conceptual.

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Notwithstanding this, the suggested straight road alignment would potentially directly abut the proposed development structure while the deflected road alignment would avoid such as well as an existing weigh bridge, but would not directly align with the Merrywell Industrial Estate Road to the north.

It is therefore considered that the conceptual road layouts submitted by the applicants have not fully satisfied the further information request in terms of fully demonstrating that the proposed development would not prejudice the future delivery of the identified road extension. In advance of identifying a preliminary design, the proposed development therefore has the potential to impinge on and prejudice the realisation of the County Development Plan's future road proposal including the tie in and alignment with the Merrywell Industrial Estate Road to the north.

In the event of grant of permission, it therefore recommended that a condition be attached that limits the duration of permission for the development for a period of no more than 5 years, and requires the proposed development to be removed from site unless, prior to that date, permission is granted for retention for a further period or indefinitely by the Planning Authority.

The reasoning for such a condition would relate to prematurity pending the determination by the planning authority/roads authority of a road layout for the area. It is considered that such a condition would be reasonable in the context of the relatively simple nature of the proposed steel framed and steel sheeted industrial structure that is being proposed and also within the context that the uses that are proposed within the proposed structure appear to be currently accommodated within a simple temporary structure that exists on site. Permission for a period of time of no more than 5 years is also considered to be reasonable in the context that the subject roads proposal is now being proposed under the 6-year road programme contained in the Draft South Dublin County Council Development Plan, 2022- 2028 (July 2021).

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