



INTERNAL MEMORANDUM

Section: Planning Delivery Team, Forward Planning, LUPT

Date: 126/05/22

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Development Management Section
Land Use Planning and Transportation Department

Register Reference: SD22A/0099

Development Summary:

Construction of 5 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 20,158sq.m;. Each warehouse / logistics unit to includes car parking (a total of 200 car parking spaces and 110 cycle spaces), service yards & HGV loading bays.

Construction of 3 three storey own-door office buildings (Block SA, SB and SC) with maximum heights of c. 13.45 metres and a combined GFA of 4,194sq.m with a total of 77 car parking spaces, & 50 cycle parking space.

Construction of a cafe/restaurant unit with a maximum height of c. 6.09 metres and a GFA of 213sq.m to be located in the south western section of the site with 14 car parking spaces and 10 cycle spaces.

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; The proposal includes landscaping and planting, boundary treatments and green roofs,

Location: Site at Calmount Road and Ballymount Avenue, Ballymount Industrial Estate, Dublin 12
Applicant: Blackwin Limited
App. Type: Permission

Introduction

The purpose of this memorandum is to advise the Development Management Section on the progress of the City Edge Project, to comment on the above proposal from the perspective of the Planning Delivery Team and, in turn, to inform the Chief Executive's Report on the planning application.

Overview of the 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.

Further to 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 impetus to prepare a Strategic Framework for the area originated from objective CS6 SLO 1 contained within the Core Strategy of the current South Dublin County Development Plan, 2016-2022 (Variation 3) and was endorsed by the Department of Housing, Local Government and Heritage (DoHLGH) through the award of €920,000 in URDF funding to carry out a baseline study as well as a Strategic Framework.

A non-statutory Strategic Framework has since been prepared jointly between South Dublin County Council and Dublin City Council (DCC) with a Steering Group that includes the DoHLGH, the Land Development Agency, Transport Infrastructure Ireland, the National Transport Agency, the Chief Executive of South Dublin County Council and the Deputy Chief Executive of Dublin City Council.

The Strategic Framework, which sets out a high-level strategy for the regeneration of the City Edge area over the coming decades to 2070, was noted at a meeting of South Dublin County Council on 9th May 2022 and will be put before the June 2022 meeting of Dublin City Council, also for noting.

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 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.

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 advice 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 vitally 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 as well as relevant regional transport policy and projects.

Report on Planning Proposal

Development Plan Roads Objective

The entire of application site is traversed between its northern and southern boundaries by a Road Proposal (Long Term) as identified on Map 5 (see figure 1 below) and Table 6.6 (Medium to Long Term Road Objectives) of the South Dublin County Council Development Plan (2016 – 2022), as follows:

Road	Description	Function
Ballymount Industrial Estates Street Network	Various streets within the Ballymount employment area.	Formation of a strategic street network within the Ballymount and Robinhood employment areas.

Table 1: Extract from Table 6.6 of the South Dublin County Council Development Plan (2016 – 2022)

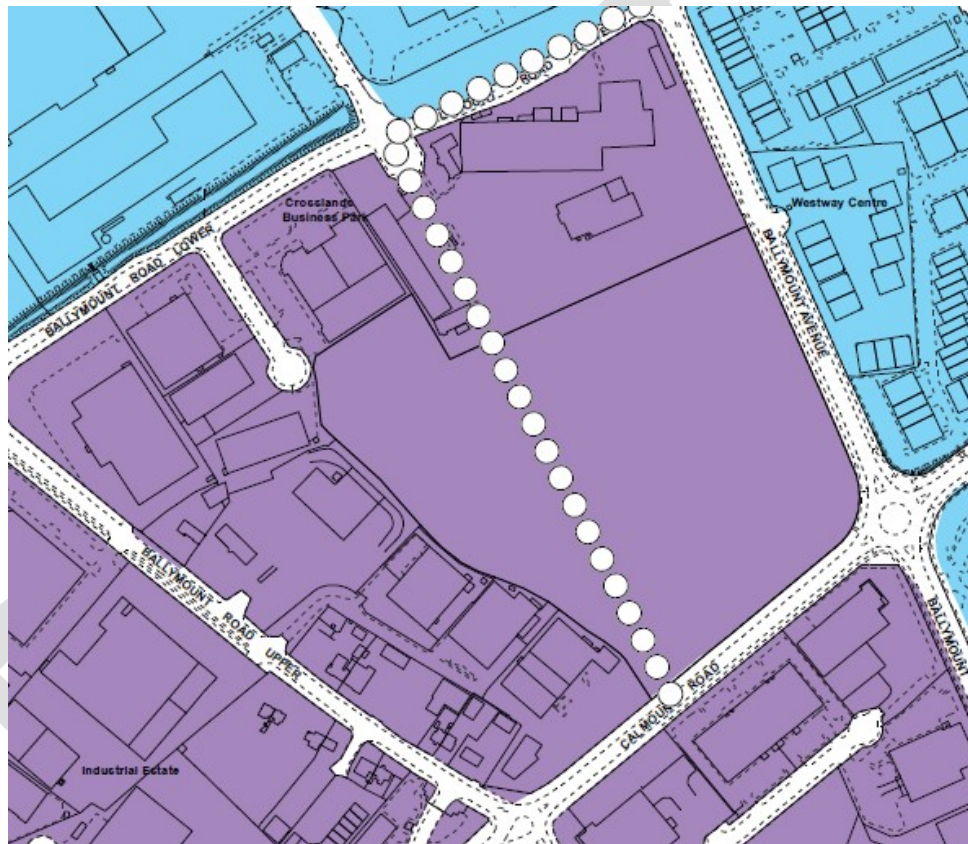


Figure 1: Medium to Long Term Road Proposal through application site – South Dublin County Council Development Plan 2016 - 2022

A road objective through the application site is further identified on Map 5 and Table 7.5 of the Draft South Dublin County Council Development Plan 2022 – 2028 (July 2019) but this time as a 6-year road proposal as follows:

Road	Description	Function
Naas Road Framework Area Street Network	Various streets and roads within the Naas Road Framework Area.	Formation of a strategic street network within the regeneration lands.

Table 2: Extract from Table 7.5 of the Draft South Dublin County Council Development Plan 2022 – 2028 (July 2019)



Figure 2: 6 Year Road Proposal along Northern Boundary of Site – Draft South Dublin County Council Development Plan 2022 – 2028 (July 2019)

The Planning Delivery Team advise that the subject Roads Objective is of potential importance from the perspective of helping to create a permeable network of streets and urban blocks that links Calmount Road with Ballymount Road Lower while aligning with the Merrywell Industrial Estate Road to the north of the application site.

The development proposal responds to this roads objective through the incorporation of a road proposal through the application site, which the applicant suggests will be taken in charge by the local authority. The proposed road would be accessed via a splayed entrance off Calmount Road at the southern boundary of the application site and would terminate at its northern boundary in the form of a “mini round about”.

The proposed road would have a carriageway width of approx. 9 metres and would be flanked by planted verges (2 metres wide), footpaths (1.75 - 1.8 metres wide) and off-road cycle lanes (1.5 – 1.75 metres wide).

Using the Design Manual for Urban Roads and Streets (DMURS, 2019) as a guide, the suggested carriageway width would exceed that recommended for the highest level street (Arterial – max 7 metres). No design rationale has been submitted, however, for the proposed through road.

Furthermore, the appropriate hierarchical positioning, width(s), alignment and connection point with Ballymount Road Lower for the County Development Plan Roads Objective to which the subject through road proposal relates, is yet to be fully investigated and determined by the planning authority.

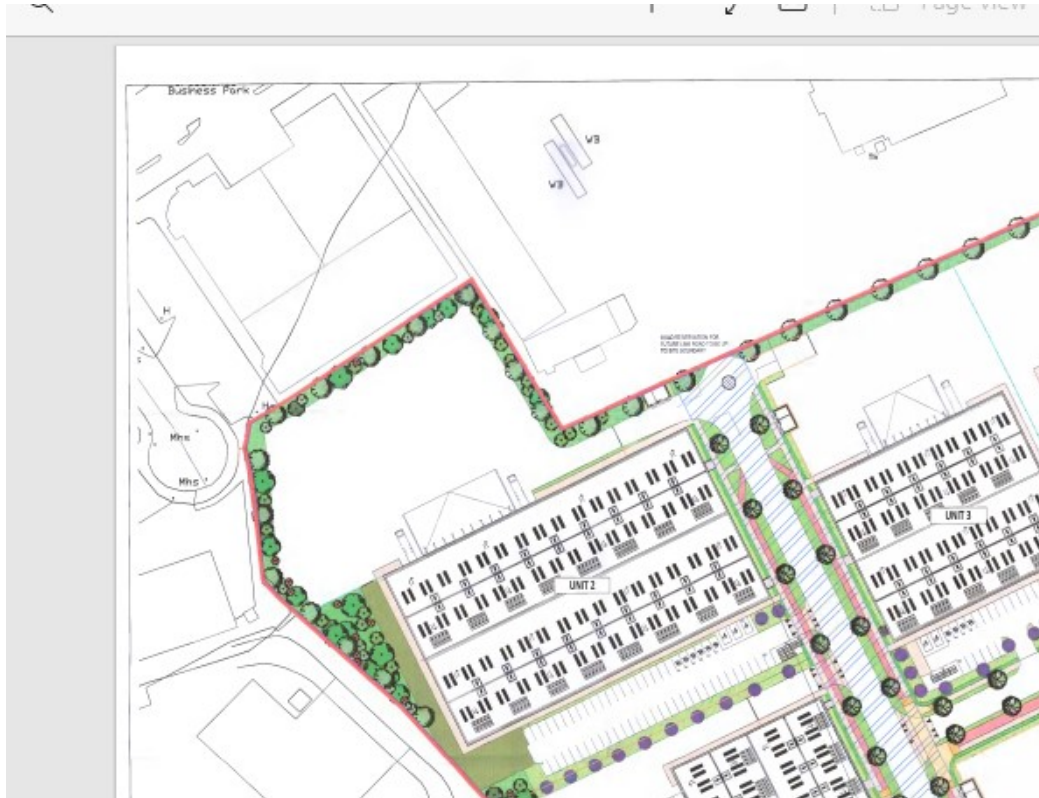


Figure 3: Extract from Proposed Layout Plan indicating road to be taken in charge.

Within this context, the applicant should be requested to submit a Street Design Statement on the proposed through road by way of further information request. Such a design statement should accord with the requirements of Section 5.2.2 DMURS (2019) and should include details that demonstrate the process that was undertaken to inform the design of the proposed through road and its outcome including:

- a) analysis of relevant plans and policies (national, regional and local), spatial characteristics, movement patterns and consultation with the roads authority.
- b) Strategic level drawings that (i) demonstrate the key routes and links that the road would connect with and (ii) the typology or conceptual street design.
- c) The movement function of the road having regards to Section 3.2.1 and 3.2.2 of DMURS
- d) Detailed street layouts that clearly illustrate all relevant geometric standards and other treatments aimed at promoting a sense of place, sustainable forms of transportation and traffic calming.

In order to minimise the potential for the proposed development to prejudice the completion of the County Development roads objective through the application site in terms of realising a connection with Ballymount Road Lower, the applicant should also be requested to demonstrate how the proposed development would accommodate optional alignments/connections by way of further information. Such a further information request should make reference to the potential to link with Ballymount Road Lower via the existing turning circle and industrial estate road directly on the north-west boundary of the application site. This option could be kept open by way of relocating the HGV loading for Unit 2 out of the path of a potential route towards the existing turning circle and by removing any proposed gateway controls.

The above information should be consistent with the Traffic and Transport Assessment that has been submitted with the subject application or any revised Traffic and Transport Assessment.

Bus Connects Greenhills to City Centre Core Bus Corridor Route

Further to the location of the application along the Calmount Road (southern boundary) and Ballymount Avenue (eastern boundary), the NTA have published a *Greenhills to City Centre Core Bus Corridor Preferred Route* (November 2020), which includes proposals at the south-east corner of the application site.

This route is being put forward by the NTA in response to policy contained under the *Transport Strategy for the Greater Dublin Area 2016 – 2035*, which seeks to implement a Core Radial Bus Network that includes a Tallaght-Walkinstown-Crumlin route. The proposed public transport route has undergone three rounds of public consultation and the next stage will involve an application from the NTA to An Bord Pleanála for planning approval.

The Preferred Route seeks to convert the existing roundabout junction between Calmount Road and Ballymount Avenue to a fully signalised junction with pedestrian and cycle facilities. This would include a cycle crossing and pedestrian crossing at the western arm of the converted junction, which would continue along the northern arm of the junction along its western side adjacent to the application site. A slight widening of the western arm junction appears to be proposed within the inclusion of filter lanes.



Figure 4: Greenhills to City Centre Core Bus Corridor Preferred Route 9 (November 2020)

The TTA and an “Off Site Road Layout” that is submitted with the subject application acknowledges the NTA’s Preferred Route but does not detail how the proposed development would tie in with it. The Road Layout Plan submitted with the subject application is based on the existing roundabout junction and proposes the inclusion of a new footpath and off-road two way cycle track along the Southern/Calmount Road boundary of the application site¹ to tie in with a new shared surface/tactile paved area proposed by the applicants at the existing unsignalised crossing on the north-western side of the roundabout junction. This would in turn tie in with a landscaped entrance plaza proposed at the south-east corner of the application site as well as a further proposed section of two-way cycle track.

¹ A letter of consent and map from SDCC is submitted with the application with regards to the footpath and cycle lane proposals along Calmount Road.



Figure 5: Extract of Applicant's Road Layout Proposal at south-eastern corner of site

There is potential conflict, however, between sections of the applicant's proposed pedestrian, cycling, crossing and plaza entrance facilities at the south-east corner of the application site and the western arm of a converted roundabout junction that the NTA have identified as a part of their Emerging Preferred Route for the Core Bus Corridor.

It is therefore recommended that the applicant be requested to submit further landscaping and road layout details that demonstrate how the proposed development would tie in and accommodate the NTA's *Greenhills to City Centre Core Bus Corridor Preferred Route* (November 2020) and demonstrate how the following would interact:

- the shared surface/tactile paved area, landscaped entrance plaza and section of two-way cycle track that is proposed by the applicant at the south-east corner of the application site; and
- the conversion of the existing roundabout junction between Calmount Road and Ballymount Avenue to a fully signalised junction with pedestrian and cycle facilities including the upgrade of the western arm junction with filter lanes as indicated by the NTA.

To accommodate the NTA's Emerging Preferred Route and the applicant's proposed pedestrian and cycle facilities, this may necessitate inclusion of a section(s) of footpath and cycle lanes within the application site. To ensure that the further information is communicated clearly, it is recommended that the following information be presented, as appropriate:

- The width of streets, footways, verges etc.
- The location, type and configuration of crossings and junctions.
- Kerb lines (including heights)
- Surface Materials and Planting.
- Lighting
- Areas to be taken in charge and in public ownership.

GDA Cycle Network Plan

Secondary Cycle routes are planned along the southern/Calmount Road and eastern/Ballymount Avenue boundaries of the application site under the NTA's *Greater Dublin Area Cycle Network Plan* (2013). The route along Calmount Road (8A) would comprise a strategic secondary route between City West, Ballymount, Walkinstown, Crumlin and Dublin City Centre. The NTA's *Draft Greater Dublin Area Cycle Network Plan* (2021) proposes to replace this with a section of Primary Radial cycle route.

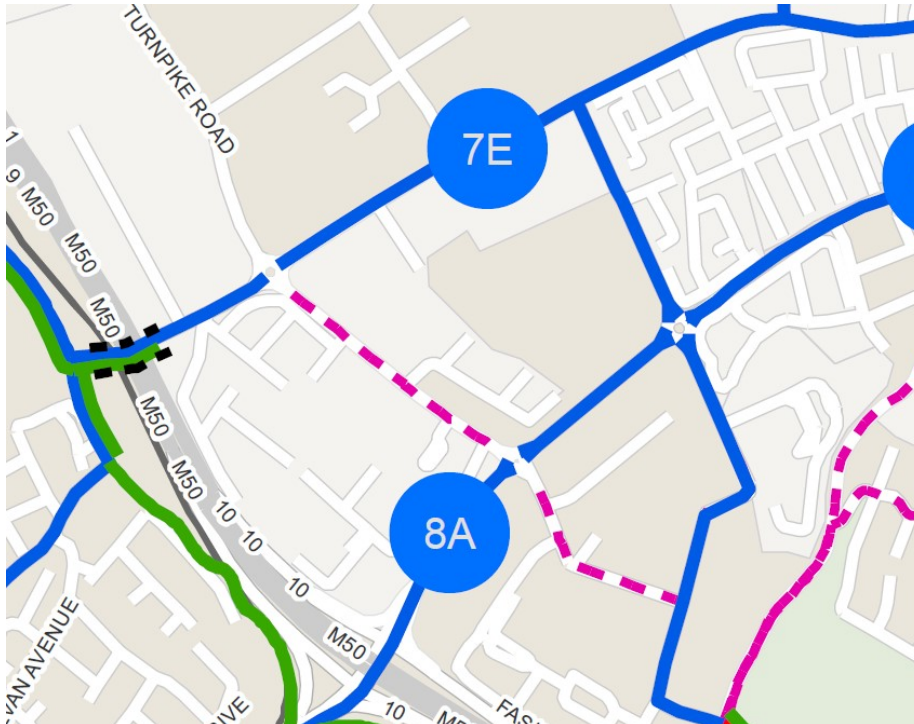


Figure 6: Extract NTA's Greater Dublin Area Cycle Network Plan (2013)

It is noted that an off-road cycle track and footpath already exists along the eastern/Ballymount of the site, however, no such facilities exist along southern/Calmount Road Boundary, which comprises a grass verge. The proposed development responds to this with the inclusion of a two-way off-road cycle track along the southern/Compound Road Boundary of the application site together with a footpath and planted verge to replace the grass verge. The proposed two-way cycle lane would continue around the southeast corner of the site and tie in with the existing single way cycle lane on Ballymount Avenue. The proposed cycle track coincides with a letter of consent and map from SDCC relating to a proposed watermain connection on Council Owned lands along the southern boundary of the site. A landscaping section indicated that the proposed two-way cycle track would measure 2.5 metres in width, which appears to comply with the NTA'S National Cycle Manual in terms of appropriate cycle lane/track widths.

As mentioned above, there is potential conflict between a section of the applicant's proposed two way cycle track and shared surface at the south -east corner of the application site and the roundabout conversion under the *NTA's Greenhills to City Centre Core Bus Corridor Preferred Route* (November 2020). This issue has already been dealt with in this report above.

Street Frontage

The subject application site is significant in size at 7.45 hectares and is prominently located along Calmount Road and Ballymount Avenue on lands zoned "REGEN: To facilitate enterprise and/or residential led regeneration".

This Regen zoning objective has been applied under the South Dublin County Council Development Plan 2016 – 2022 to lands that are proximate to town centres and transport

nodes but also have high levels of vacancy, poor environmental quality and fragmented land ownerships.

The proposed development exceeds 1,000 sq.m. in size and it is therefore a requirement under Sections 11.2.1 of the County Development Plan to submit a Design Statement, which the applicants have submitted together with Computer Generated Images.

It is considered, however, that the proposal does not fully demonstrate compliance with Section 11.2.4 of the County Development Plan, which refers specifically to design criteria and design statement relating to Regen zones. This is particularly in the context of the absence of proposed building frontage along a significant section of Calmount Road and the proposed location of parking along this boundary.

It is therefore recommended that the applicant be requested to submit a revised Urban Design Statement by way of Further Information along with the relevant plans and particulars that demonstrates compliance with Section 11.2.4 of the South Dublin County Council Development Plan 2016 – 2022, particularly the need to demonstrate a clear transition towards a more urban form of development and a traditional street network. To ensure that the proposed development accords with these requirements, the applicant should be advised to reposition Unit 6 in a manner that would directly front Calmount Road and to also relocate car parking away from this interface.

Sustainable Drainage and Green Roofs/Walls

It is noted that details submitted with the proposed development make reference to the incorporation of a SUDS train that would include swales, tree pits, green roofs and permeable paving.

This aspect of the proposed development should be referred to the Environmental Services Department for further consideration in terms of compliance with Council policy on SUDS and the recently published *Sustainable Drainage Explanatory, Design and Evaluation Guide* (SDCC, 2022) as well as achieving the appropriate run-off rates and run off quality with reference to the Floods and Water Framework Directives.

The planning application as submitted proposes green roofs on the smaller own-door office units and on the office elements of the warehouse units. Limited green wall areas are also proposed. Policy G5 (Green Infrastructure, Sustainable Urban Drainage Systems) Objective 2 (contained in the current County Development Plan) seeks *'To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments'*. **The potential for the provision of much larger areas of green roof and green wall over and on the warehouse units should be investigated.**

Summary/Conclusion

On foot of Regional and Local Policy that seeks to promote compact growth within the City Edge Project Area, a non-statutory Strategic Framework has been formulated with the purpose of informing a statutory plan at the next stage of the City Edge Project. The Strategic Framework does not comprise a framework for development consent and should not be treated as such.

With reference to policy and objectives contained in the South Dublin County Council Development Plan as well as regional transport policy and projects that are relevant to the City Edge Project, it is important that development proposals within the boundary of the City Edge Project Area, such as the current proposal, are not premature pending the preparation and adoption of the statutory plan and do not prejudice the formulation of such.

Within this context, the entire of application site is traversed between its northern and southern boundaries by a Road Proposal (Long Term) as identified under the South Dublin County Council Development Plan (2016 – 2022). In the case of the Draft County Development Plan, this Road Proposal is identified as a 6-year Road Objective.

The subject road proposal is potentially significant in terms of creating a permeable network of streets and urban blocks including a connection between Calmount Road and Ballymount Avenue that can be incorporated into a statutory plan under the City Edge Project. The development proposal seeks to respond to this roads objective through the incorporation of a road proposal through the application site, which would connect with Calmount Road but would terminate at the northern boundary of the application site and would exceed the recommended carriageway width for the highest level street under DMURS(2019).

No design rationale has been submitted for the proposed through road, and the appropriate hierarchical positioning, width(s), alignment and connection point with Ballymount Road Lower for the County Development Plan Roads Objective to which the subject through road proposal relates, is yet to be fully investigated and determined by the planning authority.

There is also potential conflict between sections of the applicant's proposed pedestrian, cycling, plaza entrance and crossing facilities at the south-east corner of the application site and the western arm of a converted roundabout junction that the NTA has identified as a part of their Emerging Preferred Route for the *Greenhills to City Centre Core Bus Corridor* (November 2020).

Furthermore, it is considered that the proposal does not fully demonstrate compliance with Section 11.2.4 of the County Development, particularly in the context of the absence of proposed building frontage along a significant section of Calmount Road and the proposed location of parking along this boundary.

The planning application as submitted proposes green roofs on the smaller own-door office units and on the office elements of the warehouse units, while limited green wall areas are also proposed. The potential for the provision of much larger areas of green roof and green wall over and on the warehouse units should be investigated, in accordance with Development Plan policy.

It is therefore recommended that the applicant be requested to submit further information in relation to the following:

- 1. A Street Design Statement that accords with the requirements of Section 5.2.2 DMURS (2019) and should include details that demonstrate the process that was undertaken to inform the design of the proposed road through the application site and its outcome including:**
 - a) analysis of relevant plans and policies (national, regional and local), spatial characteristics, movement patterns and consultation with the roads authority (SDCC).**
 - b) Strategic level drawings that (i) demonstrate the key routes and links that the road would connect with and (ii) the typology or conceptual street design.**
 - c) The movement function of the road having regards to Section 3.2.1 and 3.2.2 of DMURS.**
 - d) Detailed street layouts that clearly illustrate all relevant geometric standards and other treatments aimed at promoting a sense of place, sustainable forms of transportation and traffic calming.**
- 2. To minimise the potential to prejudice the completion of the County Development roads objective through the application site in terms of realising a connection with Ballymount Road Lower, demonstration of how the proposed development would accommodate optional alignments/connections with reference to the potential to link with Ballymount Road Lower via the existing turning circle and industrial estate road directly on the north-west boundary of the application site. This option could be kept open by way of relocating the HGV loading for Unit 2 out of the path of a potential route towards the existing turning circle and by removing any proposed gateway controls.**

The above information should be consistent with the Traffic and Transport Assessment that has been submitted with the subject application or any revised Traffic and Transport Assessment.

3. Further landscaping and road layout details that demonstrate how the proposed development would tie in with and accommodate the NTA's *Greenhills to City Centre Core Bus Corridor Preferred Route* (November 2020) and demonstrate how the following would interact:
 - i. the shared surface/tactile paved area, landscaped entrance plaza and section of two-way cycle track that is proposed by the applicant at the south-east corner of the application site; and
 - ii. the conversion of the existing roundabout junction between Calmount Road and Ballymount Avenue to a fully signalised junction with pedestrian and cycle facilities including the upgrade of the western arm junction with filter lanes as indicated by the NTA.

To accommodate the NTA's Emerging Preferred Route and the applicant's proposed pedestrian, plaza entrance and cycle facilities, this may necessitate inclusion of a section(s) of footpath and cycle lanes within the application site. To ensure that the further information is communicated clearly, it is recommended that the following information be presented, as appropriate:

- The width of streets, footways, verges etc.
 - The location, type and configuration of crossings and junctions.
 - Kerb lines (including heights)
 - Surface Materials and Planting.
 - Lighting
 - Areas to be taken in charge and in public ownership.
4. A revised Urban Design Statement along with the relevant plans and particulars that demonstrates compliance with Section 11.2.4 of the South Dublin County Council Development Plan 2016 – 2022, particularly the need to demonstrate a clear transition towards a more urban form of development and a traditional street network. To ensure that the proposed development accords with these requirements, the applicant should be advised to reposition Unit 6 in a manner that would directly front Calmount Road and to also relocate car parking away from this interface.
 5. The planning application as submitted proposes green roofs on the smaller own-door office units and on the office elements of the warehouse units, while limited green wall areas are indicated. Having regard to the large areas of hardstanding and the expanse of roof area within the proposal, the applicant is requested to consider the provision of much larger areas of green roof and green wall over and on the warehouse units, in accordance with Development Plan Policy G5 (Green Infrastructure, Sustainable Urban Drainage Systems) Objective 2 which seeks '*To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments*'.

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Date: 30th May 2022