

**Statement of Consistency with the South Dublin
County Development Plan 2022-2028**

In respect of

**Proposed Warehousing / Logistics,
Office and Café / Restaurant Development**

At

**Calmount Road and Ballymount Avenue,
Ballymount Industrial Estate, Dublin 12**

Prepared by

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On behalf of

Blackwin Limited

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1.0 INTRODUCTION

- 1.1 This report has been prepared in response to Item No. 8 of the Request for Further Information issued by South Dublin County Council on the 31st May 2022 which states the following:

“The applicant is requested to note that the South Dublin County Development Plan 2022-2028 plan making process will reach a conclusion in the coming months. The applicant is advised that the Planning Authority is required to assess planning application having regard to the active Development Plan at the time of assessment. The further information response should provide a report demonstrating that the revised proposal is fully in compliance with the adopted new Development Plan (if relevant).”

- 1.2 We note that in the interim period that the new South Dublin County Development Plan 2022-2028 was adopted on the 22nd of June 2022 and came into effect on the 3rd of August 2022. Accordingly, we acknowledge that the FI response will be assessed by the Planning Authority under the provisions of the new Development Plan.

- 1.3 This statement provides a concise review of how the proposed warehousing / logistics, office and café / restaurant development, as revised in response to the FI request, is consistent with the new County Development Plan 2022-2028 and why the Planning Authority should issue a decision to grant permission. This Report, and the accompanying FI response document, also demonstrate how the proposals are consistent with the City Edge Strategic Framework document (August 2022).

- 1.4 Please also refer to the following FI Response documentation for further details on consistency with relevant requirements of the County Development Plan 2022-2028:

- Coordinated Design Team Response brochure
- Updated Architectural Design Statement
- Engineers Response to FI Request
- Green Infrastructure Report

- 1.5 The Coordinated Design Team Response brochure provides details of the response to each item of the FI request and the changes incorporated into the scheme, which includes redesign and reorientation of Unit 6 to provide an active street edge, other DMURs and urban design related improvements to the overall layout / design, additional green infrastructure measures, relocation of ESB Substations, provision of additional green walls and façade changes, additional EV Charging and cargo bike space provision and all associated development.

2.0 CONSISTENCY WITH THE NEW COUNTY DEVELOPMENT PLAN

- 2.1 The Planning Report submitted with the application demonstrated consistency with the relevant national, regional and local planning policy framework in place at the time of lodgement. The following sections seek to demonstrate consistency with the new South Dublin County Development Plan 2022-2028. The accompanying FI response documentation should also be reviewed for aspects of the Plan of relevance to architecture, engineering and landscape matters.

Chapter 2 – Core Strategy and Settlement Strategy

- 2.2 There are a number of policies and objectives in the Development Plan which fully support the proposed employment generating development on the subject site, in particular the following are noted:
- *Policy CS1: Strategic Development Areas*
Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.
 - *CS1 Objective 1: To ensure a sustainable and plan led allocation of housing and employment growth within the strategic development areas of South Dublin County in line with the provisions of the MASP.*
 - *Policy CS2: Naas Road/Ballymount Regeneration Lands*
Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy
 - *Policy CS5: Lands for Employment*
Ensure that sufficient serviced lands continue to be available in the right place for employment generation over the lifetime of the Development Plan.
 - *CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road/Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the City Edge Strategic Framework until such time as a Statutory Plan is in place.*
Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework.
 - *CS2 Objective 2: To facilitate a co-ordinated approach and vision to any future sustainable development of the City Edge area in collaboration with Dublin City Council, and all relevant stakeholders including the local community and existing businesses, having regard to their operational needs, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.*
 - *CS5 Objective 1: To focus high intensity employment generating uses around high-capacity public transport nodes.*
 - *CS5 Objective 3: To support mixed use employment activities in our urban areas in accordance with the settlement and retail hierarchies.*
- 2.3 The Planning Authority have accepted the principle of the proposed development under the previous EE zoning, which as set out below remains the same under the new Plan, thus the principle is considered acceptable under the new Development Plan also and consistent with the Core Strategy objectives for the County.
- 2.4 We note that the City Edge Project has progressed to 'Strategic Framework Plan' stage. The Framework Plan is a non-statutory document and the contents reflect the policies and objectives of the new Development Plan 2022-2028. The Framework Plan will be followed by a statutory plan, which is likely to comprise a transboundary plan prepared jointly with Dublin City Council. In preparing the FI response documentation, including revisions to the site layout and design, the design team members have ensured it reflects the aims for the area as set out in the Strategic Framework Plan, as requested in the FI request.

- 2.5 We understand that the non-statutory Strategic Framework does not comprise a framework for development consent and is not treated as such by the Planning Authority. However, the applicant / design team have acknowledged that pending the preparation and adoption of such a statutory plan that it is appropriate to have regard to the objectives and provisions contained in the new South Dublin County Council Development Plan that are relevant to the City Edge Project as well as relevant regional transport policy and projects. Accordingly, through the FI response documentation, the design team have demonstrated how the proposals for the subject site are consistent with the longer term objectives for the wider area.
- 2.6 However, the subject application must be decided in accordance with the provisions of the current Development Plan 2022-2028 and cannot have regard to any non—statutory policy of the planning authority, particularly where such policy conflicts with the provisions of the statutory development plan. Precedence cannot be given to an evolving non—statutory policy ahead of development plan provisions (in advance of the LAP / statutory plan being prepared), to which the planning authority has a duty to give effect under Section 15 of the Planning and Development Act 2000, as amended ('the 2000 Act'). We note that to refuse permission on the grounds that the proposed development was premature pending the preparation and adoption of a statutory plan / LAP for the area would be ultra vires.

Chapter 4 – Green Infrastructure

- 2.7 Chapter 4 of the Development Plan includes the following objectives:

GI1 Objective 4: *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks*

GI5 Objective 4: *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sqm. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).*

GI5 Objective 7: *To require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDS strategy development*

- 2.8 In response to Chapter 4 and the above objectives, Murray & Associates Landscape Architects have prepared a detailed Green Infrastructure Report, with accompanying drawings, which provides details of the various green infrastructure measures incorporated into the design, including the updates made at FI stage, to address the requirements of the new Development Plan. Appendix 1 of the Green Infrastructure Report provides a response to all relevant policies, objectives and standards of relevance, and it is submitted that the proposed development provides a suitable response for a development of this nature, and given the land use zoning, and site location and context.

Chapter 7 – Sustainable Movement

- 2.9 Section 7.5.2 includes Table 7.1 which sets out cycle routes and projects within the county. In relation to the subject site, Route No. 18 'Bothar Katharine Tynan to Ballymount, Calmount Avenue' is identified as a 'soon scheme' to be progressed over a 5 year objective within the lifetime of the Development Plan. This cycle route project is consistent with Route 8A which is identified in the Greater Dublin Area Cycle Network Plan (2013) and referenced in Table 6.4 of the previous Development Plan. The proposed development has provided for the required cycle infrastructure along the frontage of the application site. As illustrated in DBFL's FI package, any further requirements of the Planning Authority in respect to cycle infrastructure to the west along Calmount Avenue, and outside the application site boundary, can be addressed as a condition of planning.
- 2.10 We note that the road objective is identified under the six year programme in Table 7.5 in Section 7.7.2 of the new Development Plan. The proposed development will deliver on this road objective in the western part of the site from Calmount Road to the northern site boundary. We refer to accompanying FI Response Brochure and drawings for further details in respect to the design of this road and justification for its layout, and which demonstrate that the proposed alignment provides the optimal solution for the delivery of this road objective and potential future connectivity to the wider street network to the north.
- 2.11 Chapter 7 also refers to standards for car parking, EV parking and cycle parking. SM7 Objective 1 seeks to *'implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility'*. As set out in Section 2.45-2.51 below the car parking and cycle parking standards are the same as the previous Development Plan, and the scheme remains consistent with same, whilst the provision of EV parking and cargo bike spaces has been increased / provided to comply with the requirements of the new Plan.

Chapter 9 – Economic Development and Employment

- 2.12 The proposed development is considered to accord with the vision of this Chapter which seeks to provide for *"The creation of a strong and resilient economic base providing expanded opportunities for employment and facilitating a good quality of life within vibrant and attractive places to live, work, visit and invest."*
- 2.13 There are a number of policies and objectives in the Development Plan which fully support the proposed mixed employment generating development on the subject site, in particular the following are noted:
- *Policy EDE1: Overarching*
Support sustainable enterprise and employment growth in South Dublin County recognising the County's role in the Dublin region as a driver of economic growth
 - *EDE1 Objective 1: To enable a strong, inclusive and resilient economy, supported by enterprise, innovation and skills through the creation of places that can foster enterprise and innovation and attract investment and talent, consistent with National Strategic Outcomes 4, 5 and 6 of the NPF.*
 - *EDE1 Objective 2: To develop and support the Dublin Metropolitan Area Strategic Plan (MASP) through growth in the identified strategic development and employment areas of South Dublin County, as part of the growth of the Dublin Region to a sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment, and prosperity consistent with NSO 5 of the NPF.*

- *EDE1 Objective 3: To ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote compact growth by strengthening the integration between employment, housing and transportation.*
 - *EDE1 Objective 5: To support the implementation of the Metropolitan Area Strategic Plan to support the objectives for the South - West Corridor and the area within the M50 by the:*
 - o *Promotion of high tech, manufacturing and research and development in Grange Castle Business Park and Citywest.*
 - o *Intensification of industrial lands and mixed-use development at Naas Road/Ballymount and in Tallaght Town Centre/Cookstown while ensuring, to the greatest extent possible, the sustainability of existing businesses and employment.*
 - *Policy EDE4: Urban Growth, Regeneration and Placemaking*
Support urban growth and regeneration through the promotion of good placemaking to attract employees and employers and to provide a competitive advantage to the County and diverse investment opportunity.
 - *EDE4 Objective 1: To ensure that economic and employment development is located to optimise existing infrastructure and to support development and investment in the County's urban centres supporting orderly growth and placemaking*
 - *EDE4 Objective 3: To ensure a synergy between economic growth and investment and the development of urban centres, supporting consolidation and re-intensification of infill, brownfield and underutilised lands within the County.*
 - *EDE4 Objective 4: To direct people intensive enterprise and employment uses such as major office developments (>1,000sq.m gross floor area) into appropriately zoned lands subject to their location within approximately 500 metres of a high frequency urban bus service and/or within 1000 metres walking distance of high capacity transport stops (Train/Luas), and to demonstrate the required walking distance or provision of a permeability project, in accordance with the Permeability Best Practice Guide (2013), to achieve same.*
 - *EDE4 Objective 5: To ensure that proposals to diversify or densify underutilised industrial lands support the overarching goals of placemaking, consolidating growth centres along public transport corridors in a planned and/or sequential basis, and ensuring realisable linkages with nearby services and amenities.*
 - *EDE4 Objective 7: To require that employment space provided as part of new mixed-use development is suitably designed to be a viable workspace to meet the needs of a broad range of different employment types.*
 - *EDE4 Objective 8: To support the provision of a broad diversity of employment opportunities in the County that can attract a wide range of skills, training, and educational qualifications for a resilient and inclusive economy*
- 2.14 The proposals for the development of this greenfield site at Calmount Road and Ballymount Avenue are considered to be consistent with the policies and objectives to provide for increased employment in the Ballymount area through the intensification of employment uses on suitably zoned lands.
- 2.15 The proposal for a mixed employment development of warehousing / logistics and office floorspace, with an ancillary café restaurant, is considered to be appropriate for the subject site and accords with key policies and objectives supporting the delivery of appropriate density of development on underutilised sites. In addition, the high quality public realm and architectural proposals will ensure the proposals positively contribute to the Ballymount Industrial Estate area and reflect the longer-term City Edge proposals for the wider area (as discussed further in Section 3 below).

- 2.16 The applicant is aware of significant market demand for such uses in this location, and it is considered a substantial employment generating development can be delivered on the site in the short to medium term. The proposed development, whilst being fully consistent with the EE zoning, also accords with national and regional policy. In terms of the National Planning Framework, NPO 2a which states *'a target of half of future population and employment growth will be focused in the existing five Cities and their suburbs'* and NPO 7 which encourages population growth *'in strong employment and service centres of all sizes, supported by employment growth'*.
- 2.17 The proposed development will make a positive contribution to the area and can deliver large scale warehouse / logistic facilities and office development in the short to medium term, given the significant market demand for such uses in this location. The proposal therefore accords with the Policy EDE1 of the CDP which supports *'sustainable enterprise and employment growth in South Dublin County recognising the County's role in the Dublin region as a driver of economic growth'* and Policy EDE1 objective 5 which supports *'the implementation of the Metropolitan Area Strategic Plan to support the objectives for the South - West Corridor'*.
- 2.18 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.

Chapter 12 – Implementation and Monitoring

- 2.19 The following outlines how the proposals for the subject site, as revised at FI stage, are consistent with the land use zoning objective and development management standards of relevance to the proposed development.

Section 12.2 Land Use Zoning

- 2.20 The subject site retains the comparable 'EE' zoning objective under the new Development Plan as under the previous 2016-2022 Plan. The land use zoning map identifies the application site as being zoned for Enterprise and Employment use (EE) which seeks *'To provide for enterprise and employment related uses'*. The proposal for warehousing / logistics units, with ancillary office space, office and café/restaurant uses on the site is considered acceptable given that all these uses are permitted in principle or open for consideration under the EE zoning objective (see zoning matrix extract included below as Figure 2.2).

Figure 2.1: Extract from Map 5 of South Dublin Council County Development Plan 2022-2028 (with approximate extent of site in red)

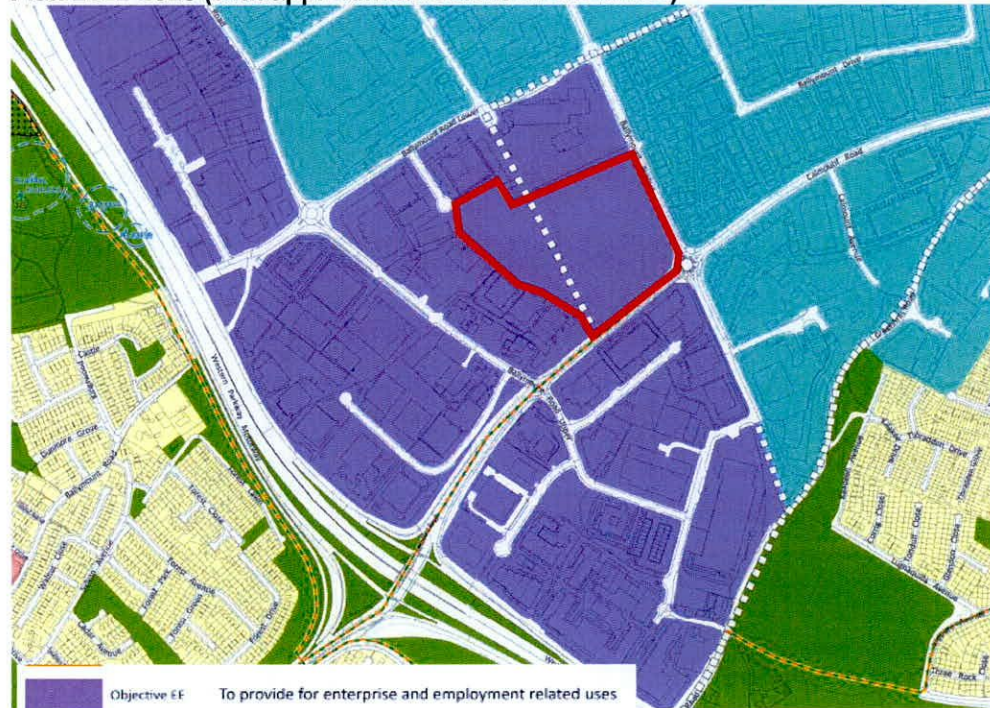


Figure 2.2: Extract from EE Zoning Objective Matrix

Table 12.10: Zoning Objective 'EE': 'To provide for enterprise and employment related uses'

Use Classes Related to Zoning Objective	
Permitted in Principle	Abattoir, Advertisements and Advertising Structures, Boarding Kennels, Enterprise Centre, Fuel Depot, Heavy Vehicle Park, Home Based Economic Activities, Industry-General, Industry-Light, Industry-Special, Office-Based Industry, Office less than 100 sq m, Open Space, Petrol Station, Public Services, Recycling Facility, Refuse Transfer Station, Science and Technology Based Enterprises, Scrap Yard, Service Garage, Shop-Local, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.
Open for Consideration	Agriculture, Allotments, Car Park, Childcare Facilities, Concrete / Asphalt Plant in or adjacent to a Quarry, Garden Centre, Hotel / Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq m-1,000 sq m, Offices over 1,000 sq m, Public House, Refuse Landfill / Tip, Restaurant / Café, Retail Warehouse, Social Club, Sports Club / Facility, Stadium, Veterinary Surgery.

2.21 As illustrated above, warehousing is a permitted in principle use. In respect to the own-door office buildings, we note that Offices of 100 sq.m to 1,000 sq.m are open for consideration, which is considered to apply to the proposed development as 12 no. individual own door offices of c. 350 sq.m each are proposed. Office over 1,000 sq.m is also listed as open for consideration should the Planning Authority wish to

assess the three own-door buildings individually, with a GFA of 1,404 sq.m (Block 5A), 1,392 sq.m (Block 5B) and 1,407 sq.m (Block 5C) respectively. Restaurant / café use is open for consideration, and the scale of the proposed facility, which is ancillary to the overall development is considered appropriate for the subject site.

- 2.22 Thus, the uses proposed are considered to be acceptable in principle for the subject lands, and this report and the accompanying FI response documentation demonstrates that the proposals are consistent with the proper planning and sustainable development of the area.

Roads Objective and Cycleway Proposal

- 2.23 The site is subject to a six year road objective under the CDP, as illustrated in Figure 2.1 above and referenced in Chapter 7 of the Plan, with an indicative road alignment running through the site and the adjoining lands to the north (from Calmount Road to Ballymount Road Lower).
- 2.24 The proposed development includes a north-south access road from Calmount Road to northern boundary of the application site, which is similarly located to the indicative route on the land use zoning map and therefore providing for future connections to the north, which in turn will facilitate the potential for the Planning Authority / adjoining landowners to deliver their longer term plans for the street network in the area.
- 2.25 Please refer to accompanying FI Response Brochure and drawings for further details in respect to the design of this road and justification for its layout, and which demonstrate that the proposed alignment provides the optimal solution for the delivery of the road objective and potential future connectivity to the wider street network to the north.
- 2.26 In addition, a 'Cycleway Proposal' is identified on the land use zoning map along Calmount Road to the south of the site. The subject application includes for cycle facilities along the Calmount Road frontage, with an illustration of how these can be extended further west provided on the relevant DBFL's drawings. It is acknowledged that should this extension of cycle facilities be required westwards that it could be required as a condition of planning.

Section 12.3 Natural, Cultural and Built Heritage

- 2.27 The following provides an assessment of the relevant policies included within this section of Chapter 12, with reference to accompanying application documentation / the FI response.
- 2.28 Section 12.3.2 relates to Ecological Protection and states the following:

"In order to comply with European and National legislation on nature conservation, and to ensure that areas of biodiversity value are adequately protected, an Ecological Impact Assessment will be required for development proposals that have the potential to impact on environmentally sensitive sites. This includes sites that are protected under EU and National Legislation; sites that may be in use by or contain protected species or habitats; or sites that are in proximity to significant watercourses."

"Any development proposals which may impact on European Sites should be screened for Appropriate Assessment and accompanied by a Natura Impact Statement (see section 13.2.3 below), if required, and will be referred to the NPWS."

- 2.29 In response to above, we refer the Planning Authority to the Ecological Impact Assessment and AA Screening Report prepared by Enviroguide submitted with the application and which demonstrates that the proposals will not have significant adverse environmental impacts.
- 2.30 The Plan states that planning permission will only be granted for a development proposal that will not have a significant effect on a European Site. We refer to the AA Screening Report prepared by Enviroguide which accompanied the application and which concludes by stating that *“On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.”* We have discussed with Enviroguide and they confirmed that the layout / design changes and responses incorporated as part of the FI response do not impact on the outcome of the AA Screening Report as originally submitted.
- 2.31 Section 12.3.3 relates to Environmental Impact Assessment and states that *“All Planning applications will undergo EIA screening or preliminary assessment.”* As outlined in Section 8 of the Planning Report, having regard to the nature of the application site and the proposed development, the surrounding context, and the distance of the site from nearby sensitive receptors, there is no real likelihood of significant effects on the environment arising from the proposed development. It is submitted that the need for environmental impact assessment can, therefore, be excluded at preliminary examination and an EIA Screening Statement in accordance with Schedule 7A is not required. The application, and additional information submitted with this FI response, includes various documentation, which should assist the Planning Authority in carrying out their preliminary screening and in demonstrating that the proposals will not lead to any significant impacts on the environment.
- 2.32 Section 12.3.4 requires all development proposals which may have implications for archaeological heritage to be accompanied by archaeological impact assessments. We refer to Archaeological Impact Assessment prepared by Courtney Deery which accompanied the application, and which confirmed that the site is of limited archaeological potential, that no further invasive works are required in order to establish the below ground archaeological potential of the proposed development lands and that archaeological monitoring is recommended during topsoil stripping.

Section 12.4 – Green Infrastructure

- 2.33 Section 12.4.2 states all planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission.
- 2.34 All development proposals shall be accompanied by a Green Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:
- Site location plan showing the development site in the context of the wider GI as shown on the Council’s GI Plan for the County;
 - Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
 - Indicate how the development proposals link to and enhance the wider GI Network of the County;

- Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.
 - Proposals for identification and control of invasive species
- 2.35 The Green Space Factor (GSF) applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq.m. The Plan states that a developer will be required to specify the GSF measures included within a proposed development as part of the submitted Green Infrastructure Plan and Landscape Plan.
- 2.36 As set out in the preceding section above, the FI response is accompanied by a detailed Green Infrastructure Report, with accompanying drawings, which provides details of the various green infrastructure measures incorporated into the design, including the updates made at FI stage, to address the requirements of the new Development Plan. Appendix 1 of the Green Infrastructure Report provides a response to all relevant policies, objectives and standards of relevance, and it is submitted that the proposed development provides a suitable response for a development of this nature, and given the land use zoning, and site location and context.
- 2.37 As detailed in the Green Infrastructure Report, the Green Space Factor (GSF) has been calculated for the site. The zoning for the site is EE and requires a GSF of 0.5 and the GSF score achieved is 0.18 (see GSF Calculator in Appendix 2 of the GI Report). The nature of this type of development for logistics which requires buildings with wide spans unsuitable for green roofs and yards with large footprints means that the design has been developed to maximise the value and richness of the boundaries and spaces between buildings. The context has been considered and the site is visually screened and contained by the extensive boundary planting spaces which are a minimum of 6m wide on all public boundaries and up to 25m in depth in certain locations, thereby providing a green edge and helping to soften the visual impact of the proposed development at street level. In terms of Green Infrastructure, all of the GI policies relevant to the site in the SDCDP have been implemented and integrated into the landscape, architecture and engineering design to maximise the value of the landscape and Green Infrastructure.
- 2.38 Thus, whilst not achieving the ambitious GSF targets for a development of this nature (which M&A have advised would be virtually impossible to achieve without a major redesign and loss of units across the site, which would not be consistent with the EE zoning and the principle of maximising the use of zoned urban land), the Green Infrastructure Report sets out how the proposal can be considered to be consistent with the relevant policies and objectives of the new CDP in respect to Green Infrastructure and therefore should be acceptable to the Planning Authority.

Section 12.5 - Quality Design and Healthy Placemaking

- 2.39 Section 12.5.1 relating to Universal Design states larger scale development proposals should include an Access Statement setting out how universal design approaches will be featured within the development. Section 10 of the updated Architectural Design Statement, submitted with this FI response, includes a section demonstrating how Universal Design requirements are incorporated into the proposed development.
- 2.40 In line with Objective QDP2, Section 12.5.2 requires applications for all new development shall be accompanied by a 'Plan Approach' Compliance Report from a suitably qualified person detailing how 'the plan approach' has been taken into consideration and incorporated into the design of the development, including the

materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed which are as follows:

- The Context of an area (Character/Infrastructure –GI/Natural/Physical)
- Healthy Placemaking
- Connected Neighbourhoods
- Public Realm
- The Delivery of High-Quality and Inclusive development
- Appropriate Density and Building Heights
- Mix of dwelling types
- Materials, Colours and Textures.

- 2.41 In respect to the requirement for a 'Plan Approach Compliance Report', we refer the Planning Authority to the updated Architectural Design Statement which has considered the relevant 8 Design Principles which form the basis of the Plan Approach to the proposed development (we note reference to mix of dwelling types is not relevant to the proposed development). The proposed development is subject to high quality design and finishes which has been refined following pre-application consultation with the Planning Authority and in response to the FI request, as detailed in the updated Architectural Design Statement.
- 2.42 In line with the provisions of Policy QDP7 Objective 1 included in Chapter 5 which seeks "*To actively promote high quality design through the policies and objectives which form 'The Plan Approach' to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County's Building Height and Density Guide*", and for all medium to-large scale and complex planning applications (commercial development over 1,000 sq.m) to be accompanied by a Design Statement, it is submitted that the updated Architectural Design Statement addresses these requirements of the new Plan.
- 2.43 In line with Policy QDP8 which relates to High Quality Design – Building Height and Density Guide, we refer to the updated Architectural Design Statement which demonstrates the appropriateness of the proposed building heights and density in the context of the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. The Design Statement includes a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the Building Height and Density Guide as it relates to this established employment and industrial area of the County.
- 2.44 The proposal includes signage zones for each unit. Details of the proposed signage for individual units will only become apparent when end-users are identified, accordingly we suggest that the details of signage for each building can be agreed as a condition of planning prior to occupation of units. The applicant and architects acknowledge that any such signage will need to be designed in with Section 12.5.7 and Table 3.19 Signage Guidance of the Development Plan.

Section 12.7 – Sustainable Movement

Cycle Parking

- 2.45 Section 12.7.1 - Bicycle Parking/Storage Standard refers to Table 12.23 for the minimum bicycle parking/storage rate for new development. Table 2.1 below

illustrates how the proposed development complies with the minimum cycle parking standards of the Plan.

Table 2.1: Compliance with Minimum Cycle Parking standards of Table 12.23 of the Plan

Use	Development Plan standard (minimum)	Required	Proposed
Enterprise and Employment (Warehousing)	1 per 200 sq.m for long term spaces, with no short stay requirement	102 no. spaces (20,398 sq.m / 200 sq.m)	110 no cycle parking spaces
Enterprise and Employment (Offices)	1 per 200 sq.m for long term spaces and 1 per 200 sq.m short stay spaces	21 no. long stay (4,194 sq.m / 200 sq.m) 21 no. short stay (4,182 sq.m / 200 sq.m)	A total of 50 no. cycle spaces are provided for the office buildings
Café/restaurant	1 cycle space per 5 staff for long term and 1 space per 10 seats short stay spaces	8 no. spaces (80 seats / 10 spaces)	10 no. spaces

2.46 Section 12.7.1 of the new Development Plan recommends short stay cycle parking standards to include a requirement for cargo bike spaces. 6 no. cargo spaces are provided for the café/restaurant and 6 no. cargo spaces are provided for the office floorspace.

2.47 TOTA and DBFL have confirmed that all bicycle parking spaces are designed in accordance with the requirements of the National Cycle Manual, NTA (2011).

Car Parking

2.48 Tables 12.25 provides details on the maximum car parking standards for non-residential development. It is noted there is no change to the maximum parking rates for the proposed uses in the new Development Plan when compared with the 2016-2022 Development Plan. Table 2.2 below illustrates how the proposed development complies with the maximum car parking standards of the new Development Plan. Please refer to TOTA's FI Schedule of Accommodation for details of the GFA of each unit and compliance with car and cycle parking standards, which is summarised below.

Table 2.2: Compliance with Maximum Car Parking standards of Table 12.25 of the Development Plan

Use	Development Plan standard	Required (maximum)	Proposed
Enterprise and Employment (Warehousing) (Zone 1)	1 space per 100 sq.m GFA for Zone 1	204 no. spaces (20,398 sq.m / 100).	203 no. spaces
Enterprise and Employment (Offices) (zone 1)	1 space per 50 sq.m	84 no. spaces (4,182 sq.m / 50 sq.m)	84 no. spaces
Café/restaurant	1 space per 15 sq.m	14 no. spaces (213 sq.m / 15 sq.m)	14 no. spaces

- 2.49 Section 12.7.5 of the Development Plan relates to EV Charging and requires a minimum of 20% for all commercial development (previously a minimum of 10% in previous 2016-2022 Plan). The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.
- 2.50 The development, as revised in this FI response, increases the provision of EV spaces from 10% to 20% in accordance with the new Development Plan requirements. The provision of EV parking comprises 41 no. spaces for the proposed warehouses, 17 no. spaces for the proposed office and 3 no. spaces for the proposed café/restaurant.
- 2.51 Section 12.7.3 includes Table 12.24 thresholds for the submission of **Workplan Travel Plan / Mobility Management Plans**. Standardised Workplace travel Plans required for warehousing development greater than 10,000 sq.m (>100 jobs) or offices greater than 2,000 sq.m (>100 jobs). We refer the Planning Authority to the Mobility Management Plan prepared by DBFL Consulting Engineers which was submitted with the application, and which satisfies this requirement of the new Development Plan. The slight increase in ancillary office floorspace as a result of the changes incorporated as part of the FI response does not materially impact on the MMP or TTA originally submitted.

Section 12.9- Economic Development and Employment

- 2.52 Table 12.27 provides key principles for development within Enterprise and Employment Zones. This is an updated version of Table 11.18 of the previous Development Plan. TOTA's and M&A's design statements which accompanied the planning application set out how the design team have prepared the proposals to accord with the requirements of Table 11.18 of the CDP, with reference to the site layout and built form / design, access and movement, open space and landscaping proposals for the site.
- 2.53 The following provides an update to reflect Table 12.27 of the Plan, which is also addressed in TOTA's updated Architectural Design Statement.

Table 2.3: Compliance with Table 12.27 of the Plan – Key Principles for Development within Enterprise and Employment Zones

Key Principles for Enterprise and Employment Zones	Response
Access and Movement	Road layout provides for the Development Plan 'road objective' through the site to the northern site boundary. The 'Street Design Statement' included in the FI Response Report demonstrates how the proposed roads / streets have been designed with regard to DMURS, the Development Plan and based on site analysis and the surrounding context.
	The street network is easy to navigate with a clear hierarchy of streets identifying the function of each street. As set out in the 'Street Design Statement', the street network comprises of two streets and is simple to navigate with a clear

		<p>hierarchy. There is no through-road for vehicles, only pedestrians and cyclists, however, the provision of the north-street, designed as a 'Local Secondary Street' in the context of DMURs requirements, is in accordance with the 'road objective' of the Development Plan and provides for future connections to Ballymount Road Lower to the north.</p>
	<p><i>Individual streets are designed in accordance with the requirements of the (DMURS) Design Manual for Urban Roads and Streets.</i></p>	<p>As set out in the 'Street Design Statement' the proposed streets have been designed in accordance with the requirements of DMURs, with the aim of creating a sustainable, adaptable streetscape that can adapt to future changes in the area and the longer term, noting the emerging proposals under the City Edge project.</p>
	<p><i>Large areas of parking (in particular staff parking) is located to the rear of buildings and screened from the street. Smaller areas of parking may be located to the front of buildings provided they are well designed (including areas of planting) and do not result in excessive setbacks from the street.</i></p>	<p>Parking areas are relatively small and screened from views from public realm, with shrub and hedge planting. Service and logistics yards are larger and to the rear of units.</p>
	<p><i>The design and layout of new business parks shall promote walking, cycling and the use of public transport, including adequate provision of cycle and pedestrian linkages</i></p>	<p>Cycling and walking are prioritised with paths, cycleways, crossing points and dedicated through-routes proposed. Cycle parking provision is provided for all units in accordance with the Development Plan.</p>
<p>Open Space and Landscape</p>	<p><i>Provision of a detailed landscape plan showing site appropriate open space which may include a hierarchy of spaces suited to a variety of functions and activities. The landscape plan will also incorporate GI elements (see GI below).</i></p>	<p>We refer to the updated Landscape Plan and Green Infrastructure Report prepared by Murray Associates, and the FI Response Report, which provides details of the informal network of open spaces to support a variety and functions, including a wildflower meadow with a picnic / seating area to provide a natural and informal amenity and recreation area.</p>

	<p><i>Important nature features of the site such as trees, hedgerows and watercourses are retained, integrated within the landscape plan and reinforced with the planting of native species.</i></p>	<p>The site is greenfield but has no trees, hedgerows, watercourses or any landscape features of note.</p> <p>The proposed development seeks to deliver significant greening and public realm improvements, with planting of native species, which will enhance the biodiversity of the area.</p>
	<p><i>Natural buffer zones and defensive planting are used to define private space and the use of fencing to the front of buildings minimised. Where fences interface with the public domain they should be of a high quality and incorporate elements of landscaping (for screening)</i></p>	<p>In order to create a positive relationship with the public realm, fencing is avoided along the main site frontages with Calmount Road and Ballymount Avenue through the proposed planting and the line of security is effectively the building line. Internal fencing will be planted with hedging to screen and soften.</p>
	<p><i>Development within business parks shall maintain and promote a parkland-like setting with high quality landscaping</i></p>	<p>Street and internal planting will create an urban parkland environment with pockets of diverse trees and open space in key locations, as well as the more structured urban planting along the streets.</p> <p>The site will have approximately 34% coverage of green and blue cover (SuDS finishes including permeable paving) as set out in the FI Response Report. If the buildings are excluded, this figure is 49% of the ground surface of the proposed development site.</p> <p>Visible fencing and security measures typical of these sites have been designed out along the public realm boundaries, to give a more open and accessible character.</p> <p>Significant depths of planting on the Ballymount Avenue and Calmount Road boundaries will have a strong modern parkland</p>

		<p>character, with extensive tree planting.</p> <p>Planting spaces are a minimum of 6m wide on all public boundaries and often up to 25m in depth, with buildings set back and screened.</p>
<p>Green Infrastructure (GI)</p>	<p>All development proposals shall be accompanied by a GI Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:</p> <ul style="list-style-type: none"> • Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County; • Site survey and analysis, identifying existing GI Infrastructure and key assets within the site; • Indicate how the development proposals link to and enhance the wider GI Network of the County; • Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site. • Proposals for identification and control of invasive species. <p>Regardless of development size or type, applicants must submit an overall site summary quantifying and detailing the following:</p> <ul style="list-style-type: none"> • tree and hedgerow removal, • tree and hedgerow retention and • new tree and hedgerow planting. <p>This information will be submitted in a digital format agreed with the Council to allow amalgamation and reporting on tree and hedgerow cover within the County over time</p>	<p>A detailed Green Infrastructure Report, with accompanying drawings, which provides details of the various green infrastructure measures incorporated into the design, including the updates made at FI stage, to address the requirements of the new Development Plan accompanies this FI response. Appendix 1 of the Green Infrastructure Report provides a response to all relevant policies, objectives and standards of relevance, and it is submitted that the proposed development provides a suitable response for a development of this nature, and given the land use zoning, and site location and context.</p>
<p>Built Form and Corporate Identity</p>	<p>Building heights respond to the surrounding context with transitions provided where necessary which reinforce the urban structure with taller buildings located along key movement corridors, gateways and nodes</p>	<p>Transitions are employed along the boundaries to Calmount Road and Ballymount Avenue as both Unit 4 and 6 propose outboard offices in which buildings step to 9.15m before achieving a parapet height of 17.09m. Own door offices further enforce this transition with a parapet height of 13.25m allowing the corner to both step the height of the proposal while also achieving in having tall</p>

		<p>buildings along the key movement corridors along the site's southern and western boundary. The corner office buildings and public plaza provide a suitable response to the node / gateway to the south east of the site.</p>
	<p><i>Individual buildings should be of contemporary architectural design and finish (including use of colour).</i></p>	<p>A high quality contemporary aesthetic is achieved through the provision of office buildings and warehouse / logistics buildings of a high quality and contemporary design.</p> <p>For the warehouse buildings, the employment of AWP cladding panels, interspersed with green walls and outboard ancillary office elements, breaks down and reduces the visual mass and scale of the warehouse/logistics buildings.</p> <p>The vertical banding of the warehouse buildings is broken by a step in the parapet which is reinforced by a change in cladding orientation and colour, which coupled with the green walls, will further break down the expansive elevations.</p> <p>The proposals also provide visual interest through generous landscape provisions along the boundary with Calmount Road and Ballymount Avenue.</p>
	<p><i>Various treatments, finishes and colours should be employed to reduce the bulk, massing and scale of larger buildings.</i></p>	<p>A variety of materials are proposed across the site in the different building formats and the larger warehouse buildings incorporate different built form, materials and green walls to break up the massing of these larger buildings.</p>
	<p><i>The layout and design of buildings should maximise frontages onto the public realm and enclose private external spaces (such as service yards and car parks) and storage areas behind them.</i></p>	<p>Each of the proposed buildings, as revised at FI stage, is located so as to maximise frontage onto the public realm with office</p>

		provision and enclosed private external space, yard and car parks either to the side or rear where possible.
	<i>Signage should be simple in design and designed to integrate with architectural feature and / or the landscape setting (see also Section 11.2.8 Advertising, Corporate Identification and Public Information Signs).</i>	Signage zones are indicated on the drawings, for which details will not be known until occupiers are identified. However, the intention is for the signage for the proposed buildings to be simple in design and integrate with the architectural treatment of the façade as per the elevations. Site signage will integrate with the landscape setting and achieve a contemporary finish.

Section 12.10 - Energy

2.54 The Development Plan states that commercial developments in excess of 1,000 sq.m of commercial floorspace should be accompanied by an Energy Efficiency and Climate Change Adaption Design Statement which should detail:

- *How any on-site demolition, construction and long-term management of the development will be catered for; and*
- *How energy and climate change adaptation considerations have been inherently addressed in the design and planning of the scheme.*

2.55 We refer to the documentation prepared by PMEP M&E Engineers and Passive Dynamics, Sustainability Consultants, which accompanied the planning application and which provides detail on energy and sustainability matters from the proposed development. The proposed warehouse and office units have been designed to target a LEED V4 Gold Certification.

2.56 In respect to the requirement for a Climate Change Adaption Design Statement, we respectfully submit that the various individual reports submitted with the planning application and responses accompanying the planning application have considered the implications / requirements of climate change in respect to the proposed development and in particular we note the following, with reference to the individual consultants' inputs accompanying the application / FI response:

- Street design, site layout and building design has been designed to comply with DMURS and incorporates measures to encourage active travel thereby reducing reliance on the private car, which is a climate change adaption measure included in the scheme design
- A Green Infrastructure Plan accompanies the FI response and demonstrates the various green and blue infrastructure measures incorporated into the design which is positive from a biodiversity and water protection perspective for the proposed development
- As noted above, the scheme has been designed to target a LEED Gold Certification for the development which brings significant environmental benefits

- As set out in DBFL's application documentation, the effects of climate change have been addressed when modelling the proposed surface water sewer network and assessed within the Site Specific Flood Risk Assessment. Each of the rainfall simulations for the proposed network have been modelled with a 20% allowance for climate change as per agreements with SDCC. Consequently, the proposed network and attenuation system has been sized to cater for the increased rainfall associated with climate change.

2.57 Thus, and the purposes of an application that is at Further Information stage, the above information and accompanying application documentation is considered sufficient to address the requirements of a Climate Change Adaption Design Statement.

Section 12.11 – Infrastructure and Environmental Services

2.58 We refer to the Engineering Services Report and Site-Specific Flood Risk Assessment prepared by DBFL Engineering which was submitted with the application, and DBFL's Engineering Response Report submitted with the FI response, which demonstrate compliance with best practice, and which complies with the requirements of Section 12.11.1 - Water Management of the new Plan.

3.0 CITY EDGE STRATEGIC FRAMEWORK

3.1 The City Edge Strategic Framework was published by SDCC and DCC in August 2022, following original publication in May 2022. The Strategic Framework is a non-statutory document and the contents reflect the policies and objectives of the new Development Plan 2022-2028. In preparing the landscape / engineering / etc. FI response documentation, we have demonstrated consistency with principles set out in respect to roads, landscaping, green infrastructure, etc., and we summarise the key planning policy objectives emerging from the Strategic Framework below.

3.2 As set out above and in accompanying FI Response documentation, the subject application is considered to be consistent with the new CDP and the key principles set down in the Strategic Framework, which is a longer term plan (c. 50 years) for the City Edge area.

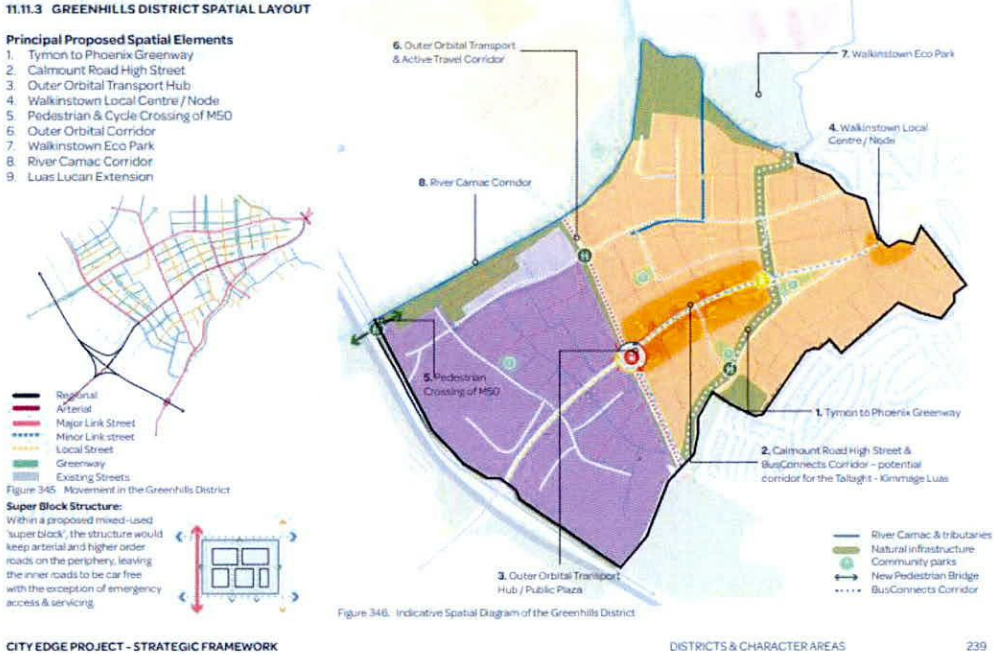
Land Use and Greenhills District

3.3 The Calmount Road site is identified as part of the Urban Industry zone within the Greenhills District. The Strategic Framework states that lower density employment will be accommodated to the west of Ballymount Avenue with a pocket of Mixed Use/Urban Industry Residential to the north of Ballymount Road Lower. To the east of Ballymount Avenue, a Residential Led Mixed Use neighbourhood will be enlivened by a local centre and high street.

3.4 Section 7.5.5 of the Strategic Framework acknowledges the potential and suitability for Logistics, Distribution & Storage uses within the City Edge area, which the proposed warehouse / logistics units would be compatible with, noting that the '*locational characteristics of City Edge provides a firm basis and opportunity for this sector to continue to grow within the area and to capture an increased share of employment. City Edge already has a sector advantage in that the logistics and distribution sector already has an established presence and workforce operating in the area*'. Whilst the own-door office uses could cater for the other sectors supported in the Strategic Framework, such as 'Urban Workspace', Medical Technology, Financial Technology and Business & Professional Services, and helping to provide

a mix of employment uses across this significant site and delivering urban design benefits reflecting the location on Calmount Road and Ballymount Avenue.

Figure 3.1: Extract from Greenhills District section of the Strategic Framework



Movement & Transport

3.5 DBFL's Engineering Response Report and the Street Design Statement, including in the FI Response Report, addresses the traffic, transport and street design related items of relevance from the City Edge Strategic Framework, with the key infrastructural objectives for the area graphically illustrated in the extract below. The DBFL response demonstrates that the proposed scheme, including building setbacks, road design / edges, active travel measures along the frontage / tying in with the existing / future proposals for the area, demonstrating that the proposals are consistent with the delivery of Bus Connects and longer term proposals for orbital routes or Luas extensions.

Figure 3.2: Extract of Movement Framework from the Strategic Framework



Figure 123. Movement framework

Urban Design and Green Infrastructure

- 3.6 TOTA's updated Architectural Design Statement demonstrates how the proposals respond to the architectural and urban design related requirements of the Strategic Framework, with high quality architectural solutions proposed for this 'Urban Industry' site and DMURs street design throughout. The site is located to the west of the proposed 'Calmount Road' high street, and will complement same through the plaza area and office uses proposed at the Bus Connects node located at the Calmount Road and Ballymount Avenue junction.
- 3.7 Murray & Associates Green Infrastructure Report provides a comprehensive response and justification for the proposals in the context of green infrastructure and landscaping related items in the Strategic Framework. The plaza design at the Calmount Road and Ballymount Avenue junction and building setbacks, green infrastructure edges and active travel measures (pedestrian and cycle infrastructure) were the subject of particular attention and consideration in the context of the vision set out in the Strategic Framework. These responses are also summarised in the Coordinated Design Team Response brochure where relevant.

Summary

- 3.8 The FI Response documentation demonstrates how the updated proposals for the subject site accord with the new South Dublin County Development Plan 2022-2028 and is consistent with the principles set down in the City Edge Strategic Framework (August 2022), which is a non-statutory document (and which was in place when the Planning Authority assessed the application).
- 3.9 The site is located in an area identified for Urban Industry, reflective of the EE zoning, and the subject lands are serviced by roads and services infrastructure, the uses are compatible with the surrounding pattern of development, and as set out in DBFL's FI response documentation the proposals are consistent with Bus Connects and other public transport improvements planned for the area, so there are no infrastructural obstacles to granting permission for the proposed development.
- 3.10 We note that in assessing the planning application, during which time the Strategic Framework was available to the Planning Authority, the Planner's Report states that *'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.'*

4.0 CONCLUSION

- 4.1 Thus, it has been demonstrated above and in the accompanying FI response documentation, that the proposed development, as amended at FI stage, is consistent with the relevant policies, objectives and development management standards in the South Dublin County Development Plan 2022-2028.
- 4.2 The proposed development accords with the Development Plan's objectives for EE zoned lands to accommodate low to medium intensity enterprise and employment uses. Given the location of the subject site within the established Ballymount Industrial Estate area and inside the M50, it is respectfully submitted that the subject is suitable for warehouse / logistics and office uses, with an ancillary café / restaurant unit. The proposed development will make a positive contribution to the area and can deliver large scale warehouse / logistic facilities and office development in the short to medium term, given the significant market demand for such uses in this location.
- 4.3 It has been demonstrated within this Statement of Consistency, and the accompanying application documentation, that the proposal provides a suitable use of the subject lands and will successfully deliver on the Enterprise and Employment zoning objective. It is respectfully submitted that the proposed development is in accordance with the zoning objective pertaining to the site and accords with other planning policies, objectives and standards of the Development Plan and is an acceptable form of development for the subject lands. We therefore respectfully request that South Dublin County Council should grant permission for the proposed development.