



Armstrong Planning

The Senior Executive Officer
Forward Planning Section
Land Use Planning and Transportation Department
County Hall
Tallaght
Dublin 24

15th September 2021

Dear Sir or Madam

RE: SUBMISSIONS ON SOUTH DUBLIN COUNTY COUNCIL DRAFT COUNTY DEVELOPMENT PLAN 2022-2028, STAGE 2 CONSULTATION

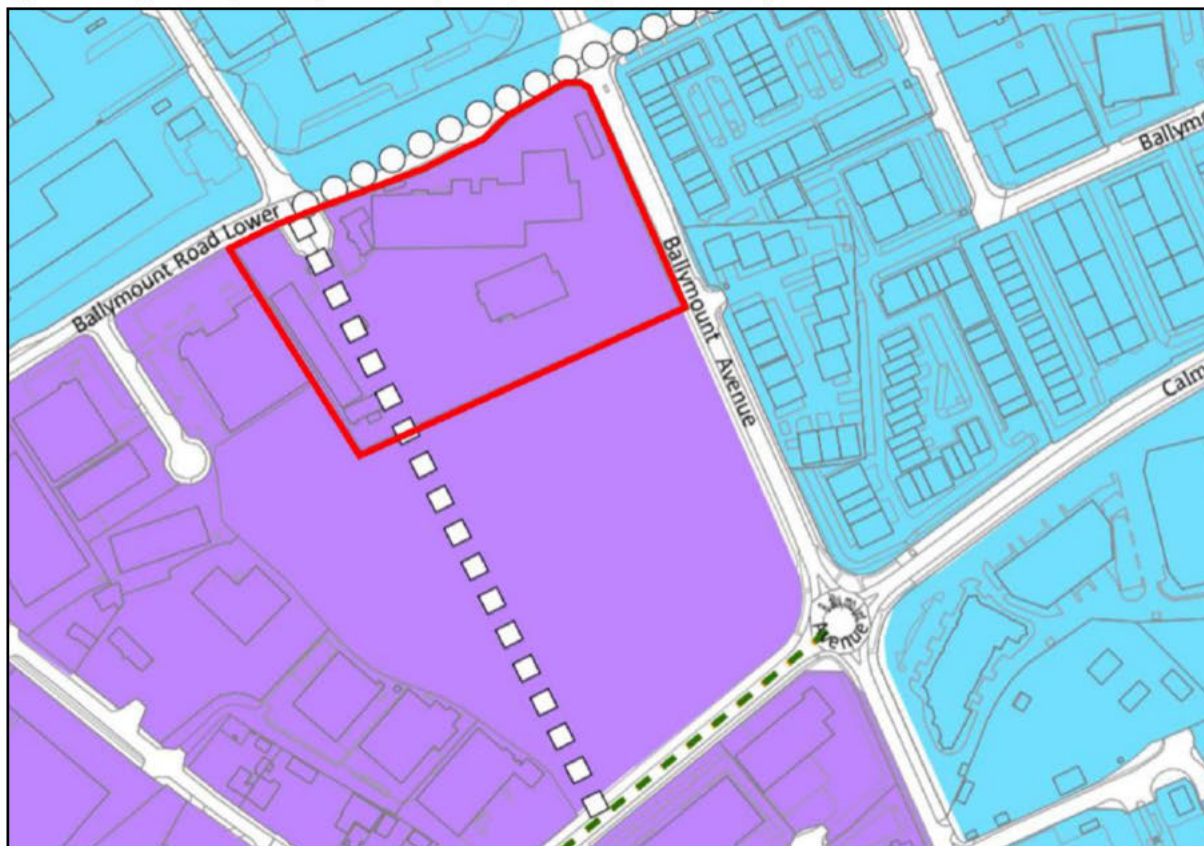
I write on behalf of Galco Steel Ltd – with a registered business address at Ballymount Road lower, Walkinstown, Dublin 12 – to make the following submissions in relation to South Dublin County Council's current round of Public Consultation on the emerging Draft County Development Plan 2022-2028. Galco Steel Ltd is a key stakeholder, they own and operate two large galvanizing plants and a paintshop at the Ballymount Industrial Estate (please see the site location plan at Appendix A), just inside (and to the east of) the M50. Galco Steel is a major employer and has been in operation since the 1960s. The galvanising processes on site is of strategic importance to Irish construction industry.

Fig. 1: Aerial photograph of the Galco Steel site, Ballymount



We note that Sheet 5 of the Draft County Development Plan identifies an aspirational future road (Road Proposal – 6 Years) running north-south directly through our client’s landholdings, the Galco Steel site, at Ballymount connecting Ballymount Road Lower (to the north) to Calmount Road (to the south).

Fig. 2: Extract from Draft Development Plan (Sheet 5) showing new road through the Galco Steel site



Draft Policy SM4 of the Draft Development Plan is to *“improve and, where necessary, expand the County-wide strategic road network to support economic development and provide access to new communities and new development areas.”*

Draft Policy SM4 Objective 7 is *“to implement the 6-year Roads Programme set out under Tables 7.5 and 7.6 and to work towards the implementation of the medium-longer roads programme where feasible and subject to funding.”*

The ‘Six Year Road Programme’ is set out in Table 7.5 of the Draft Development Plan. There is no specific mention of the proposed road connecting Ballymount Road Lower to Calmount Road, however we presume that the subject road forms part of the Draft Development Plan’s reference to the plans for ‘Greenhill Road Upgrade and Links’, which features in Table 7.5 and relates to the *“Upgrade of Greenhills Road from Airton Road to Walkinstown Roundabout with new links to Ballymount Avenue, Limekiln Road and Calmount Road for BusConnects provisions and long-term residential communities.”*

The function of these planned road improvements is described in Table 7.5 as being: *“To provide improved access to/between employment lands within Tallaght, Ballymount and Robinhood and to*



provide improved access to and from the Greenpark, Limekiln and Greenhills area and provide for BusConnects provisions."

We note that planned bus routes for BusConnects do not include the proposed north-south road. We also note that the concerning north-south road will terminate at Calmount Road, and therefore provides no throughway, which raises questions about the usefulness of such an additional connection through an occupied and operational site. We note further that the expressed 'function' of the planned road improvements (quoted above) does not provide a sufficient rationale for running the six-year north-south road through the subject lands specifically. There is, therefore, no justification for this aspirational north-south road as shown on Sheet 5 and in the extract at Fig. 2 above.

We would also make the point that the proposed roadway would be contrary to Draft Policy SM4 (quoted above) as it would negatively affect economic development rather than supporting economic development, as the policy aspires to do.

My client is gravely concerned about the location of this aspirational north-south road as shown on the draft Development Plan (Sheet 5) traversing the Galco Steel site. The plant on-site is in use and has been operating since the 1960s. The business currently employs approximately 160 people. The operation of a galvanising plant involves the coating of molten zinc at 450° on fabricated steel to provide rust protection. The baths on-site contain 600 tonnes of molten zinc and 750 tonnes of hydrochloric acid and caustic soda, which would be unfeasible to relocate. The prospect of subdividing or cleaving the site by constructing a new public road through the middle of the site would be unacceptable to my client as it would drastically affect the viability of the site and its ability to be operated safely and efficiently. Accommodating the north-south road as shown on the draft plan would threaten the continued operation of the plant.

It should also be noted that the subject site is an EPA Licensed site. There are over 100 HGVs accessing the site per day, a road through the site would therefore require two new access points. The planned road alterations would undermine the baseline of the existing licence and would therefore necessitate a fresh EPA licence application, the cost of which would be significant and unduly onerous for my client.

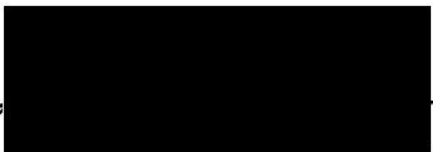
Galco Steel Ltd. plans to make a significant investment in the site in the short term, and seeks to expand their operations in a manner that will intensify the existing industrial use on the site. My client is concerned that their development ambitions and future plans for the subject site will be constrained and negatively affected in the event that the aspirational six-year roadway that is identified on the draft Development Plan is carried through to the final iteration of Development Plan once adopted.

We therefore highlight significant concern with the location of the planned six-year roadway (as depicted on Sheet 5) and request that it be removed from the Development Plan entirely in order to avoid traversing the Galco Steel site and interfering with the existing operations thereon.

We trust the Council will have proper regard to these submissions in its preparation of the emerging Development Plan and we look forward to future opportunities to engage in the consultation process. Please see the Site Location Plan at Appendix A, and a Legal Letter attached at Appendix B.



Faithfully,



DAVID ARMSTRONG *BA MRUP MRTPI MIPI*

APPENDIX A

SITE LOCATION PLAN

Osi PLACE Map

CENTRE
COORDINATES:
ITM 709759,730595

PUBLISHED:
06/11/2019

ORDER NO.:
50092783_1

MAP SERIES:
1:1,000

MAP SHEETS:
3327-13

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search 'Large Scale Legend'

A detailed map of the Ballymount area in Dublin. The map shows several streets, including Ballymount Road Lower and Ballymount Avenue. A red boundary outlines a specific area of interest. Various landmarks are labeled, such as Merrywell Business Park, Recycling Centre, Car Parks, and industrial estates. The map also includes geographical names in Gaelic: Baile Átha Cliath (Dublin), Cil na Manach (Kilnamanagh), and Baile an Mhóta Beag (Ballymount Little). The map scale is indicated as 1:1,000.

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 GALCO SITE BOUNDARY

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13.09.2021	P1	SUBMISSION FOR DRAFT DEVELOPMENT PLAN
DATE:	REV:	

STATUS KEY:	S = SKETCH DESIGN	P = PLANNING
F = FIRE SAFETY CERT	T = TENDER	C = CONSTRUCTION

ISSUED FOR:

PLANNING

Arthur Gibney & Partners
ARCHITECTURE

5 Rosemount Terrace
Dundrum Road,
Dundrum,
Dublin 14.

T: +353 1 478 4300
E: info@agpartners.ie

CLIENT: Galco Steel Ltd.

DATE: SEPT. 2021	SCALE: 1:1000 @ A2	DRAWN BY: C. Vermaak
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PROJECT: Galco
Ballymount Road Lower,
Walkinstown, Dublin 12

DRAWING TITLE:

SITE LOCATION / ORDNANCE
SURVEY MAP

DRAWING No: 17.84.101	REVISION: 1
	STATUS: P

1 SITE LOCATION / ORDNANCE SURVEY MAP

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APPENDIX B

LEGAL LETTER

Our Reference: LDR/GA270/002/

15 September 2021

The Senior Executive Officer
Forward Planning Section
Land Use Planning and Transportation Department
County Hall
Tallaght
Dublin 24

Re: South Dublin County Council – Draft Development Plan 2022 – 2028; Lands at Ballymount Road Lower, Walkinstown, Dublin 12

Our Client: Galco Steel Limited

Dear Sirs

We are instructed by Galco Steel Limited, and are writing to you in connection with the submission (to which this letter is appended) prepared by Armstrong Planning.

We note and support the submission of Armstrong Planning. We confirm that we are instructed to monitor the progress of the draft Development Plan with our client and its technical consultants, particularly insofar as the draft Plan may impact 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.

We also confirm that, in due course, we will not hesitate to pursue any legal challenge(s) which are considered necessary to protect our client's legitimate and constitutional property rights in respect of its lands at Ballymount Road Lower.

We trust that South Dublin County Council will have regard to this letter, in conjunction with the submission of Armstrong Planning.

Yours faithfully



ARTHUR COX

Grainne Hennessy Séamus Given Caroline Devlin Sarah Cunniff Elizabeth Bothwell William Day Andrew Lenny Orla O'Connor (Chair)
Brian O'Gorman Mark Saunders John Matson Kevin Murphy Cormac Kissane Kevin Langford Eve Mulconry Philip Smith Kenneth Egan
Alex McLean Glenn Butt Níav O'Higgins Fintan Clancy Rob Corbet Ultan Shannon Dr Thomas B Courtney Aaron Boyle Rachel Hussey
Colin Kavanagh Kevin Lynch Geoff Moore (Managing Partner) Chris McLaughlin Maura McLaughlin Joanelle O'Cleirigh Richard Willis Deirdre Barrett
Cian Beecher Ailish Finnerty Robert Cain Connor Manning Keith Smith John Donald Dara Harrington David Molloy Stephen Ranalow
Gavin Woods Simon Hannigan Niamh Quinn Colin Rooney Aiden Small Phil Cody Karen Killoran Richard Ryan Danielle Conaghan
Brian O'Rourke Cian McCourt Louise O'Byrne Michael Twomey Cormac Commins Tara O'Reilly Michael Coyle Darragh Geraghty Patrick Horan
Maeve Moran Deirdre O'Mahony Deirdre Sheehan Ian Dillon Matthew Dunn David Kilty Siobhán McBean Conor McCarthy Órlaith Molloy
Olivia Mullooly Laura Cunningham Mairéad Duncan-Jones Ryan Ferry Imelda Shiels Brendan Wallace Ruth Lillis Sarah McCague Niamh McGovern