

TRANSPORTATION PLANNING DIVISION

11th August 2022

SHD REFERENCE: SHD0014-22

LOCATION: Lands at junction of Santry Avenue and Swords Road, Santry, Dublin 9

PROPOSED: Demolition of existing buildings on site and construction of 350 no. apartments, retail / commercial, medical suite / GP Practice and community units and associated site works.

FOR: Dwyer Nolan Developments Ltd

TRANSPORTATION PLANNING DIVISION REPORT

Planning permission is sought for:

- Demolition of existing buildings on site
- Construction of 350 no. Apartments
 - 113 no. 1 bed
 - 218 no. 2 bed
 - 19 no. 3 bed
- 777 no. bicycle parking spaces
 - 9 no. cargo bike spaces
- 209 no. car parking spaces
 - 9 no. motorcycle spaces
- 1137.4 sqm. Commercial / retail / community / residential amenity
- Amended vehicular access from Santry Avenue
- Works to the public footpath along Santry Avenue and Swords Road
- Associated site works

Planning History

On site:

ABP-310910-21 (SHD0016-21). A SHD application was refused permission in November 2021 for 350no. apartments and 5 no. retail/commercial units. Reason for refusal related to the material contravention statement and did not relate to this division.

Pre-application Consultation (ABP-312127-21, DCC ref: ABPSHDPAC0025-21)

The pre-application consultation opinion issued from An Bord Pleanála on the 25th of April 2022. The Board considered that a number of issues needed to be addressed in the documents submitted. None of the items raised within the application relate to this division.

Issues Raised by Transportation Planning Division during Pre-Application Consultation

This division had a number of concerns relating to the proposed development based on the submission made for Pre-Application Consultation. The issues raised are summarised below:

1. It appears that the Stage 1 Road Safety Audit has been omitted in error from the documentation submitted. As the Traffic and Transportation Assessment submitted with this application remains unchanged from the previous application (under ABP310910-21), it is assumed that the omission of the RSA from the package of documents was purely clerical and in that regard, the previous comments by this division remains unchanged (as outlined below) and should be addressed within any final application.

A Road Safety Audit Stage 1 has been prepared which highlights a number of matters that are required to be addressed. Revised drawings should be submitted with the final application confirming the problems have been resolved.

These are:

- Problem 3.1: Arrangements at the left in, left out junction along Swords Rd into the site.
 - Problem 3.7: The size of the corner radii at all junctions in the development
 - Problem 3.8: Proposed Footpath along the R132 – Swords Road
2. The applicant is requested to submit an Operational Servicing Management Plan. Details to include anticipated servicing and operational requirements for the residential and commercial components of the development including details of arrivals/departures, drops-offs and collections, café deliveries, and all refuse management requirements. All servicing and operations should be accommodated from within the site unless a detailed rationale is provided for the necessity for loading bays to be provided within the public realm. It is advised that a 2metre public footpath should be provided to the rear of any loading bay in the public area that is free from any basement or building overhang.
 3. Revised drawings should be submitted which clearly delineate a 2 metre wide footpath around the perimeter of the site along its boundaries with Swords Road and Santry Avenue. There should be no overhanging or building under the public footpath to be taken in charge.

Changes between Pre-Application Consultation Application and development as currently Proposed

An overview of the main changes relevant to this division are as follows:

Type of Development	Pre-Application Consultation	Current Planning Application	Increase/Decrease
No. Residential Units Proposed	350 no. residential units	350 no. residential units	No change
Car Parking Spaces	209 no. spaces (173 no. at basement and 36no. at surface level)	209 no. spaces (0.59 ratio)	No change
Bicycle Parking Spaces	777no. cycle spaces (719no. spaces at basement and 58no. spaces at surface level)	777 no. cycle spaces including 9no. cargo parking spaces.	No change
Other space (GFA)	975.1 sqm Residential amenity / retail / commercial / community uses.	1,137.4 sqm Residential amenity / retail / commercial / community uses	160 sq.m Increase

The current application remains largely unchanged from that previously submitted to An Bord Pleanála. It is noted that the increase in non-residential development results in this floor area being the same as previously submitted under ABP-310910-21 (SHD0016-21).

TPD Comments

The applicant seeks to demolish all buildings on site and construct a new development comprising of 350 no. apartments, 1,137.4 sq.m of commercial, community and residential amenity space within 4no. buildings, sub-divided into 7 no. blocks ranging in height from 7 storeys to 14 storeys, together with a total of 209 no. car parking spaces of which 173 no. are located at basement level and 36 no. residential and set down/visitors spaces also incorporating 6no. mobility impaired and 3 no. car share (GoCar) spaces will be provided at surface level. 777 no. cycle parking spaces, and all ancillary works

Having reviewed all the documentation submitted with this SHD application, the comments of this Division are contained below.

Inconsistencies

It is noted that there are discrepancies in the submitted reports and drawings in relation to type and quantum's relating to car and bicycle parking in particular. Where relevant to this division, these have been referenced in detail within the report below.

Site Location

The application site comprises of the Chadwicks Builders Merchants and is approximately 1.5ha in area. The site is located at the junction of Santry Avenue and Swords Road with frontage onto both roads. The northern boundary is formed Santry Avenue and the eastern boundary by Swords Road. To the south a new development is currently under construction (approved under Ref. No's: 2713/17 & 2737/19) with existing industrial units to the west. This development to the south is known as 'Santry Place'. The site is located approx. 6.5km north of the City Centre.

Access

There are currently 2 no. vehicular access points into the site along Santry Avenue. One access serves the existing building merchants on site and the other provides access to the site to the south which is currently under construction.

It is proposed to close the access serving the existing building merchants on site and retain and modify the remaining access along Santry Avenue. Drawing 'Road Layout Plan' provides details on the proposed modifications to this access showing that 45m sight lines can be achieved in both directions. The proposals to this access are to be DMURS compliant and will improve the pedestrian environment at this location where the existing access is excessively wide.

An additional vehicular access and internal access road was approved under Planning Register Reference 2713/17 to serve the adjoining development. This access and the new internal road has been included within the red line boundary of application and will provide both on street car parking and access to the basement car and cycle parking. The general layout and access arrangements onto Swords Road remain as previously permitted.

It is noted that the secondary access onto Swords Road was granted in agreement with the NTA and is to be a left in, left out only given the nature of and future proposals of the Swords Road and the Bus Connects proposal. The submitted Roads Layout Plan confirms that this new access will be designed for left in, left out only. However it is noted issues have been raised in the Road Safety Audit which are detailed further within this report.

The internal access road will provide for two way traffic with a T junction arrangement within the site where the existing road meets with the new internal road. A segregated pedestrian footpath will be provided adjacent to the carriageway.

Works to the Public Realm and impact on Bus Connects

A letter of consent issued by the Transportation Planning Division, dated the 14th of June 2021 has been included within the application to permit the inclusion of the existing public footpath surrounding the site along Swords Road and Santry Avenue

The public footpath around the perimeter of the site and specifically at the junction of Santry Avenue and Swords Road is narrow and substandard in nature. This division had requested a set-back of all elements of the proposal, including landscaping and hard landscaping area to provide a 2m wide public footpath around the perimeter of the site.

A square grassed / landscaped area located at the corner junction reduces the footpath width less than 1m. It should be clear that a 2m wide unobstructed footpath of 2m width, which will be taken in charge as a public footpath, is required around the perimeter of the site along Swords Road and Santry Avenue. A condition should be included ensuring the provision of this. This shall be carried out in accordance with Taking in Charge standards which are set out within a sub paragraph below.

As per the request of this division within the Pre-Application Consultation report the proposed 24m loading bay along Santry Avenue should be removed. This loading bay requires the removal of public footpath to facilitate the loading bay. This is not acceptable to this division at this location. All servicing of the site must take place within the curtilage of the site inside the site boundary.

Under the most recent Bus Connects proposal (Revised Network Map 2020) for the Swords Road to City Centre (CBC No.2), the proposed development would not appear to impact on the delivery of the route along this corridor.

The applicant has submitted a plan titled 'NTA's CBC Corridor No.2 Swords to City Centre which sets out the proposed layout of the BusConnects proposal. This plan confirms the location of the bus stop on the Swords road, south of the site, the proposed left in, left out access arrangements for the new access and the retention of the public footpath adjoin the road along the Swords Road.

Road Safety Audit

A Road Safety Audit Stage 1 has been prepared and submitted which highlights a number of matters that are required to be addressed. Revised drawings should be submitted by means of compliance.

These are:

- Problem 3.1: Arrangements at the left in, left out junction along Swords Rd into the site.
- Problem 3.4: Conveniently locating the loading bay along Santry Avenue.
- Problem 3.6: Additional footpath and dropped kerbs for parking spaces at the east of the development.
- Problem 3.7: The size of the corner radii at all junctions in the development
- Problem 3.8: Proposed Footpath along the R132 – Swords Road

Traffic and Transportation Assessment

A comprehensive and detailed Traffic and Transportation Assessment report (TTA) has been submitted as part of the application. The contents of this have been assessed and are noted.

Car Parking Provision and Management

The application site is located within Area 3 as identified within Map J of the Dublin City Development Plan 2016-2022. The proposed development provides for 209 no. car parking spaces; the Traffic and Transport Assessment (TTA) report states that the following breakdown of car parking spaces.

- 173 no. at basement level
- 36 no. residential and set down/ visitor spaces at surface level
 - 17 no. visitor spaces (8%)
 - 4 no. car club spaces
 - 5 no. set-down / loading bays
 - 18 no. dedicated mobility impaired spaces (5%) – 12 no. at basement and 6 no. at surface level.
 - 21no. electric vehicle charge point spaces (10%)
 - 194 no. resident parking spaces

- 9 no. motorbike spaces (4%)

The level of car parking equates to a 0.59 ratio to serve the 350 no. units. A comprehensive rationale is provided within the submitted TTA supplemented by a Mobility Management Plan.

With regard to car parking management, Section 5.3 of the TTA set out the car parking provision and car parking management strategy for the development, it is stated that the car parking spaces will be managed separately by the an appointed management company and that car parking spaces will be available to rent via a residents only permit scheme for varying lengths of duration. To effectively encourage the use of sustainable modes of transport amongst the future residents, it is considered that the car parking spaces should be retained on a rent/lease agreement by residents, renewed annually or at an agreed interval as is set out within the submitted strategy and should not be permanently assigned to individual units. This would ensure that the spaces are assigned on the basis of need. The proposed development is located on a public transport corridor and is within 2km of the future Metrolink stations of Ballymun and Northwood. The sale of car parking spaces with residential units is not supported by this division and would also undermine the mobility management strategy for the development.

Bicycle Parking

There are discrepancies in the number of bicycle parking spaces proposed. Drawing No.D1809.P04 'Site Layout – Taking in Charge Map' references 805 no. bicycle parking spaces of which 763no. are long term (719 no. in basement) and 42 no. visitor spaces.

Taking into consideration that the statutory site notice refers to 777 no. bicycle parking spaces, this is the quantum that will be assessed.

777no. cycle parking spaces are proposed;

- 719 no. long term spaces located at basement level
- 58 no. short term spaces located at surface level

An additional 9 no. cargo bike spaces are also provided at basement level.

The quantum is considered acceptable to this division and accords with the standards set out in the Apartment Guidelines There are concerns regarding some elements of the layout of the proposed cycle parking which would be restricted in some instances if a vehicle was parked in certain spaces e.g. access to the disabled parking bays would be impacted by its position adjacent to the cargo bike space would be Also none of the long term bicycle parking spaces are provided with any security i.e. locked stores or cages. Greater security to encourage use by residents should be provided.

Taking in Charge

The applicant has confirmed that all internal streets and footpaths within the development are to remain within private ownership. Drawing No.D1809.P04 'Site Layout – Taking in Charge Map', shows the areas to be taken into around the perimeter of the site including a wide strip along Santry Avenue. This area includes area of landscaping and hard landscaping which cannot be taken into charge by DCC. The applicant shall agree in writing with the Road Maintenance Division all areas, if any, to taken into charge. Details of the materials proposed in public areas shall be in accordance with the document *Construction Standards for Roads and Street Works in Dublin City Council*.

Construction Management

An outline Construction and Environmental Management Plan has been submitted. The contents of this are noted. In the event of a grant of permission, a Demolition Management Plan and Construction Management Plan should be submitted to the Planning Authority for written agreement.

Recommendations

This division is broadly satisfied with the proposed development. In the event of a grant of permission, the following conditions should pertain.

1. Prior to commencement of development, and on appointment of a demolition contractor, a **Demolition Management Plan** shall be submitted to the planning authority for written agreement. This plan shall provide details of intended demolition practice for the development, including detailed traffic management, hours of working, noise and dust management measures and off-site disposal of demolition waste and access arrangements for labour, plant and materials, including location of plant and machine compound. The Demolition Traffic Management Plan shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport. The appointed contractor shall liaise with DCC Road Works Control Division during the demolition period.
2. Prior to commencement of development, and on appointment of a main contractor, a **Construction Management Plan** shall be submitted to the planning authority for written agreement. This plan shall provide details of intended construction practice for the development, including traffic management, hours of working, noise and dust management measures and off-site disposal of construction waste and access arrangements for labour, plant and materials, including location of plant and machine compound. The Construction Traffic Management Plan shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport. The appointed contractor shall liaise with DCC Road Works Control Division during construction period.
3. The applicant / developer shall address the issues raised within the Stage 1 Road Safety Audit:
 - Problem 3.1: Arrangements at the left in, left out junction along Swords Rd into the site.
 - Problem 3.4: Conveniently locating the loading bay along Santry Avenue.
 - Problem 3.6: Additional footpath and dropped kerbs for parking spaces at the east of the development.
 - Problem 3.7: The size of the corner radii at all junctions in the development
 - Problem 3.8: Proposed Footpath along the R132 – Swords Road

Revised drawings shall be submitted where required for agreement of the Planning Authority.

4. Prior to commencement of development, any works to the public road and footpaths, including the upgrading of pedestrian footpaths, changes to road markings and installation of double yellow lines/road signage if necessary, shall be carried out in accordance with the requirements of the Area Engineers in Traffic Advisory Group (TAG) and Road Maintenance Services in Dublin City Council and at the applicant's own expense.

5. A 2 metre wide footpath shall be provided around the perimeter of the site along its boundaries with Swords Road and Santry Avenue. Details of the materials proposed in public areas shall be in accordance with the document *Construction Standards for Roads and Street Works in Dublin City Council* and any areas to be taken into charge agreed in writing with the Road Maintenance Division of the Planning Authority. No part of a building or structure shall overhang under or over the public footpath to be taken in charge.
6. The proposed loading bays along Santry Avenue shall be omitted. All servicing shall take place from within the site.
7. The applicant/developer/operator shall undertake to implement the measures outlined in the Mobility Management Plan and to ensure that future tenants of the proposed development comply with this strategy. A Mobility Manager for the overall scheme shall be appointed to oversee and co-ordinate the preparation of individual plans.
8. Cycle parking shall be secure, conveniently located and well lit. A revised basement layout shall be submitted for agreement of the Planning Authority providing key/fob access to secure bicycle compounds within the basement. The provision of said storage may necessitate omission of some car parking spaces. Cycle parking at surface level design shall be of the Sheffield design so as to allow both wheel and frame to be locked. Cycle parking shall be in situ prior to the occupation of the proposed development.
9. Car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements.
10. All costs incurred by Dublin City Council, including any repairs to the public road and services necessary as a result of the development, shall be at the expense of the developer.
11. The applicant/developer shall be obliged to comply with the requirements set out in the Code of Practice.

Nicola Conlon, Senior Executive Planner
On Behalf of Edel Kelly, Senior Transportation Officer