

Strategic Housing Development Large Scale Residential Development at Hartfield Place, Swords Road, Whitehall, Dublin 9

Response to ABP Opinion and DCC comments on Pre
Application Consultations

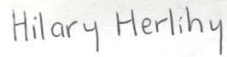
Eastwise Construction Swords Limited.

Number: 60601744

March 2022

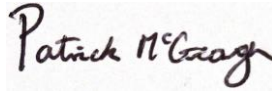
Quality information

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1. Introduction

This technical report has been prepared by AECOM to address the;

- Dublin City Council (DCC) Tripartite Feedback: and
- An Bord Pleanála (ABP) Opinion

The responses from DCC and ABP are related to the submission of Traffic and Transport Assessment (October 2021) for a proposed development at Hartfield Place, Swords Road, Dublin 9. The proposed development will consist of the construction of 7 no. blocks in heights up to 8 storeys (over single level basement) comprising 472 no. apartment units, a creche, café unit, and internal residential amenity space. The proposal also includes car, cycle, and motorcycle parking, public and communal open spaces, landscaping, bin stores, plant areas, substations, switch rooms, and all associated site development works and services provision. Access is provided from the development from Swords Road with associated upgrades to the existing public road and footpaths

DCC identified 16 no. issues to be addressed in any forthcoming SHD application.

ADDENDUM B Opinion from other relevant Departments (DCC) ABP – 311749 – 21 (DCC Ref: ABPSHDPAC0018/21) Hartfield Place' Swords Road, Whitehall, Dublin 9 dated 14th November 2021.

This is included in Appendix A and it is intended that this technical report will address the traffic and transport concerns raised in items no. 2 to 16 and form part of the overall SHD application to ABP on behalf of Eastwise Construction Swords Limited.

The ABP opinion requested specific information in relation to 13 no. items. Items 1 and 2 relate to traffic and transport and will be addresses in this technical report

1. Drawings and documentation clearly describing the design and layout of the proposed junction with the Swords Road / Iveragh Road and proposed modifications to the existing road, footpath and cyclepath networks. The application should demonstrate how the proposed development, will facilitate, ABP-311749-21 Pre-Application Consultation Opinion Page 2 of 5 and not interfere with, the implementation of Bus Connects proposals at this location.

2. Any subsequent planning application should address the matters raised in the report of the Dublin City Council Transportation Planning Division dated 14th November 2021 and should be accompanied by the following:

(i) Drawings clearly showing the proposed public footpath and cycle path along the Swords Road frontage of the site. Evidence of consent for all works to the public realm on lands outside of the applicant's landholdings should be provided.

(ii) A detailed Traffic and Transport Assessment (TTA).

(iii) A Mobility Management Plan and a Parking Management Strategy.

(iv) An operational service plan including a detailed swept path analysis. The plan should address inter alia, the management of car parking and drop- off movements associated with the proposed creche.

(v) Details of the quantum and design of bicycle parking / storage, in accordance with the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments.

(vi) A Quality Audit in accordance with Annex 4 of DMURS, including a Road Safety Audit. The Road Safety Audit should consider, inter alia, the design and layout of parking within the development, design of the Swords Road junction, and the movement of pedestrians and cyclists through the site

(vii) A construction traffic management plan

Figure 1.1 illustrates the proposed site layout as submitted as part of this planning application.

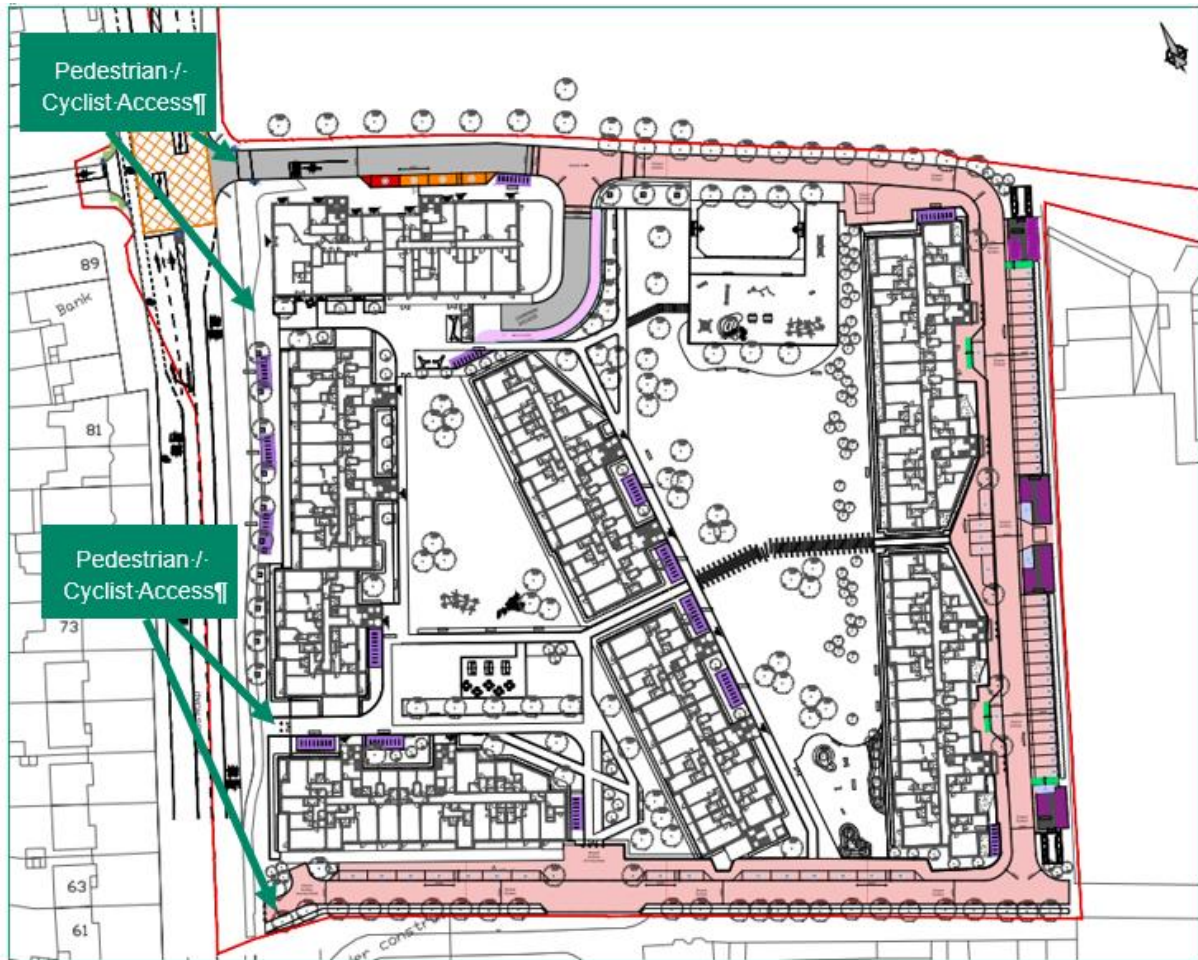


Figure 1.1 Pedestrian Cyclist Access points (Source: AECOM PR379360-ACM-XX-XX-DR-CE-10-0001)

2. AECOM Response to DCC Comments

2.1 Introduction

Each of the items raised by DCC, and where applicable TII, as part of the Comments from DCC have been addressed below.

2.2 Item 1 – Dublin Tunnel

'The subject site is located above the Dublin Tunnel corridor area and as such the applicant is advised to refer to and accord with Dublin City Development Plan Policy MT22 and Appendix 6. The Tunnel Impact Assessment should be referred to Transport Infrastructure Ireland (TII) for assessment and observations and the applicant is advised to liaise with TII on requirements to ensure the structural integrity of the tunnel is not compromised as a result of the works. The potential impacts of the development and Port Tunnel structural integrity should also be assessed in combination with other proposed and/or previously granted developments in the locality. The applicant is advised to liaise with Dublin City Council Transport Planning Division to commence engagement with TII in advance of the submission of any forthcoming application.'

AECOM Response:

A tunnel Impact Assessment has been completed by AGL Consulting Geotechnical Engineers and is submitted with this SHD Application

2.3 Item 2 Bus Connects

The proposed site access arrangement and western boundary proposals should be agreed with the National Transport Authority (NTA) to ensure that the proposals do not conflict with the Bus Connects proposals. This division can facilitate engagement with the NTA upon request from the applicant prior to the submission of a final application.

AECOM Response:

The latest layout for taking cognisance of NTA Bus Connect proposals are shown below in Figure 2.1 and detailed in AECOM Drawing number PR379360-ACM-XX-XX-DR-CE 20-0001. This drawing has been passed onto Bus Connects Team via Dublin City Council Transport Planning team by email for comment.

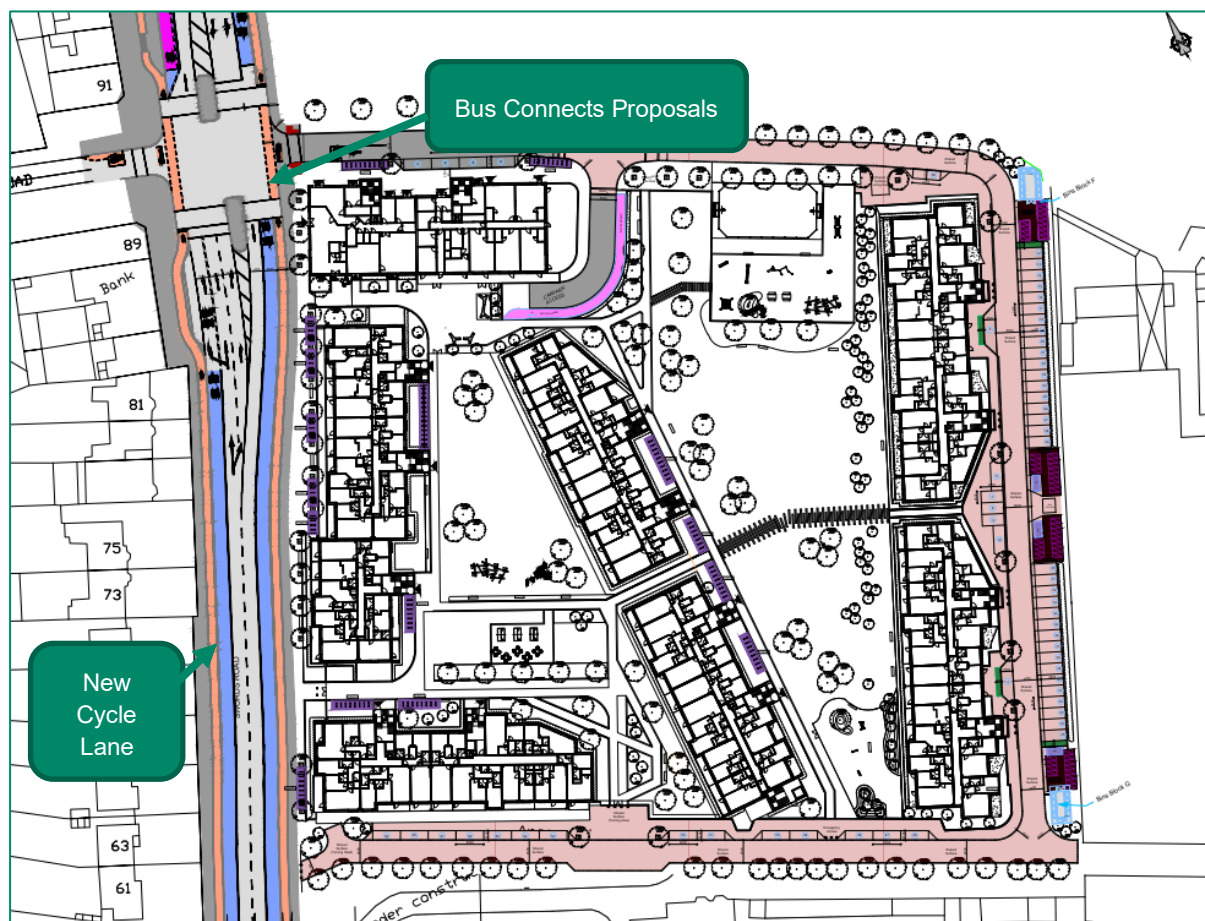


Figure 2.1 Proposed General Arrangement (Bus Connects) (AECOM Drawing PR379360-ACM-XX-XX-DR-CE-20-0001A)

2.4 Item 3 – Road Safety Audit

Submit a Road Safety Audit Stage 1 assessing the site access and junction and the internal development layout, including basement car park.

AECOM Response:

A stage 1 Road Safety Audit (RSA) has been undertaken by a Road Safety Audit team which have received approval from the TII through the Road Safety Audit Approval System (RSAAS). The report and recommendations contained therein have been incorporated into the design where appropriate.

A Road Safety Audit Stage 1(Quality Assessment) and the Designer Response are included in a separate report.

2.5 Item 4 – Accessibility and Permeability

This division requires that a public footpath of 2.0 minimum width is retained under the charge of DCC along Swords Road. The applicant is requested to submit revised drawings on the proposed replacement of the existing public footpath with a cycle path and grass verge along Swords Road showing the proposed new cycle path, grass verge and public footpath along the western boundary of the site on Swords Road.

AECOM Response:

AECOM Drawing PR379360-ACM-XX-XX-DR-CE- 00-0001 General Arrangement in Figure 2.2 shows the proposed public footpath and grass verge with the new signalised access to the development, along the western boundary of the site on Swords Road. Currently cycling is permitted within the citybound bus lane so an

additional cycle path had not been included in this drawing. A new cycle path public footpath and verge has been included in the option as per drawing for BusConnects (see response to Item 2)

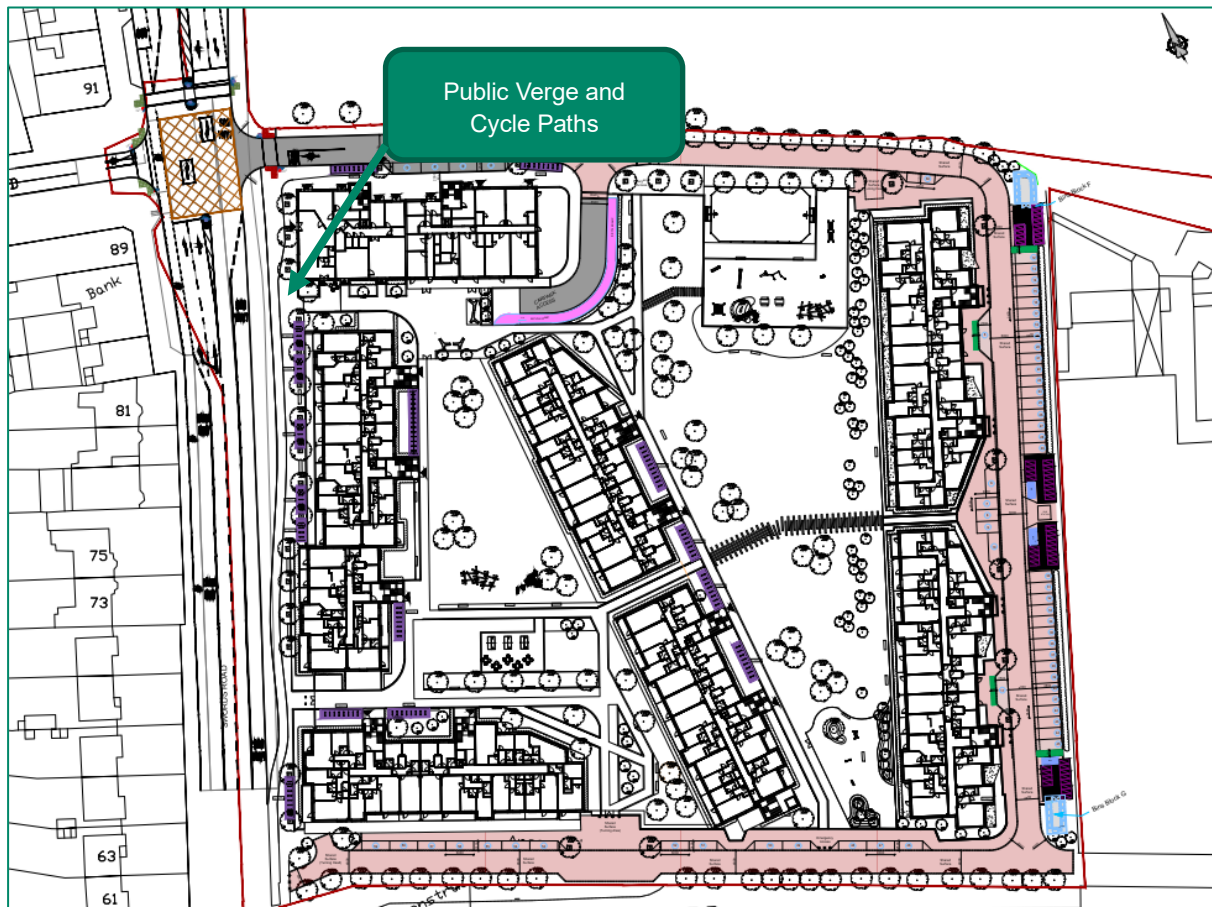


Figure 2.2 Proposed General Arrangement (AECOM Drawing PR379360-ACM-XX-XX-DR-CE-10-0001C)

2.6 Item 5 – Emergency Access

Clarity is required as to the number of emergency vehicle access points proposed onto Swords Road. Justification should be provided for additional emergency access points onto the Swords Road.

AECOM Response:

There are two points to allow emergency service access to the site off Swords Road. These relate to the distance requirements for fire tenders to buildings. These locations are stopped up with removeable bollards and are for emergency use only and therefore would not be open to residents or the public. There is a further emergency access at the south west corner of the site onto Swords Road. Again, this is controlled by removeable bollards and is only for use is there is an issue at the main site egress onto Swords Road.

2.7 Item 6 -Car Parking

The applicant is requested to provide clarification on the following car parking arrangements:

- a) Confirm the total number of parking bays to be allocated to residents;

AECOM Response: 274 no. at basement, 60 no. at surface total. In total 308 no. parking spaces are allocated to residents. see architects basement layout (C+W O'Brien Drawing HARTPL-CWO-BT-B1-DR-A-092001) and AECOM |Drawing PR379360-ACM-XX-XX-DR-CE- 00-0001.

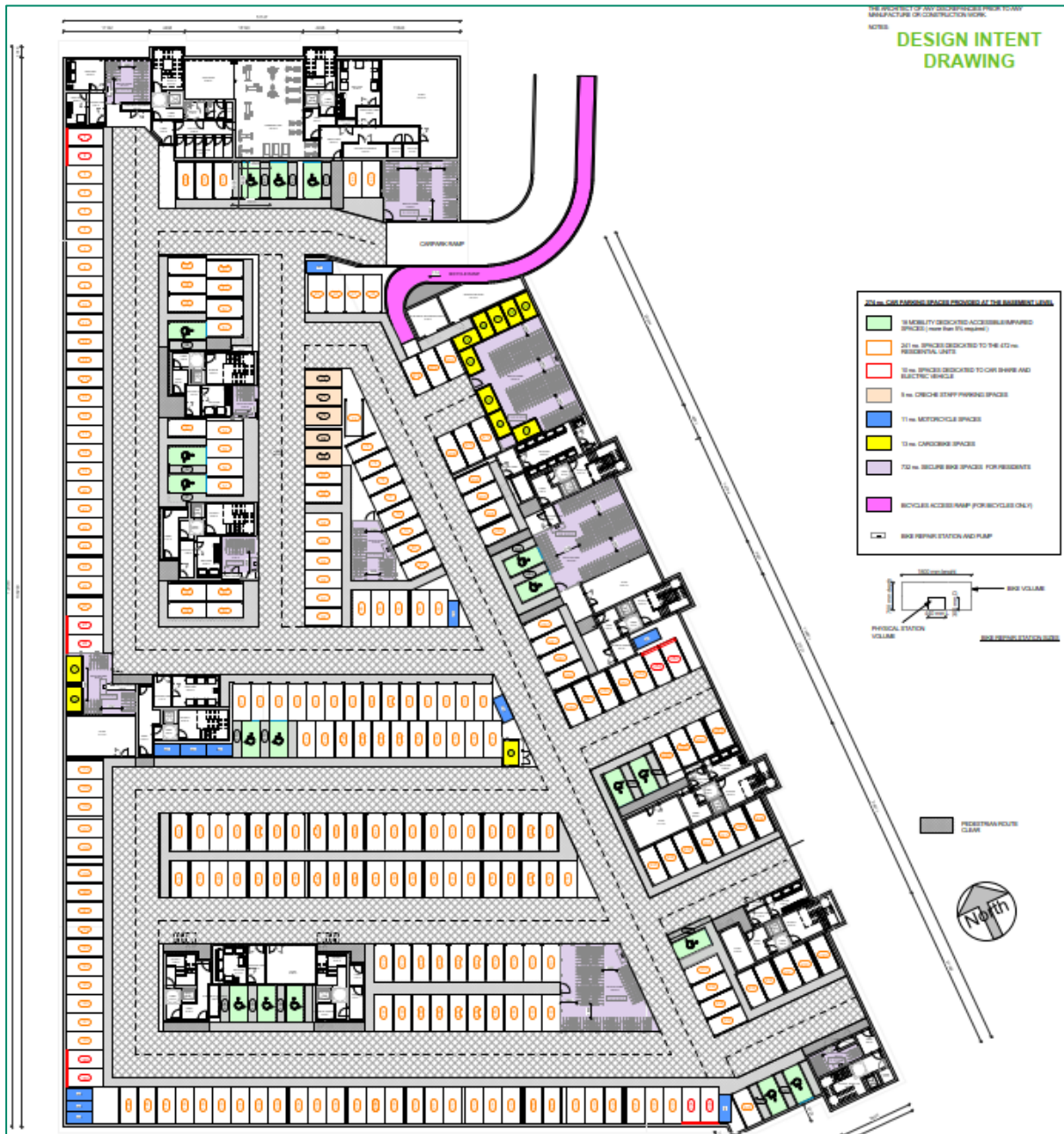


Figure 2.3 Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

b) Visitor parking is required to be incorporated onsite;

AECOM Response:

Following meeting with DCC Transport Planning (27.01.2021) visitor parking spaces have been provided at surface level on the south side of the site on the internal service road. These are illustrated in Figure 2.4 on C+W O'Brien Architects Drawing No. 000502.



Figure 2.4 Surface Layout(Source: C+W O'Brien Architects Drawing No. 000502)

c) Indicate the proposed locations of designated Car Club spaces onsite;

AECOM Response:

10 no. Car Club spaces are to be provided at basement Level

These are illustrated on C+W O'Brien Drawing HARTPL-CWO-BT-B1-DR-A-092001)

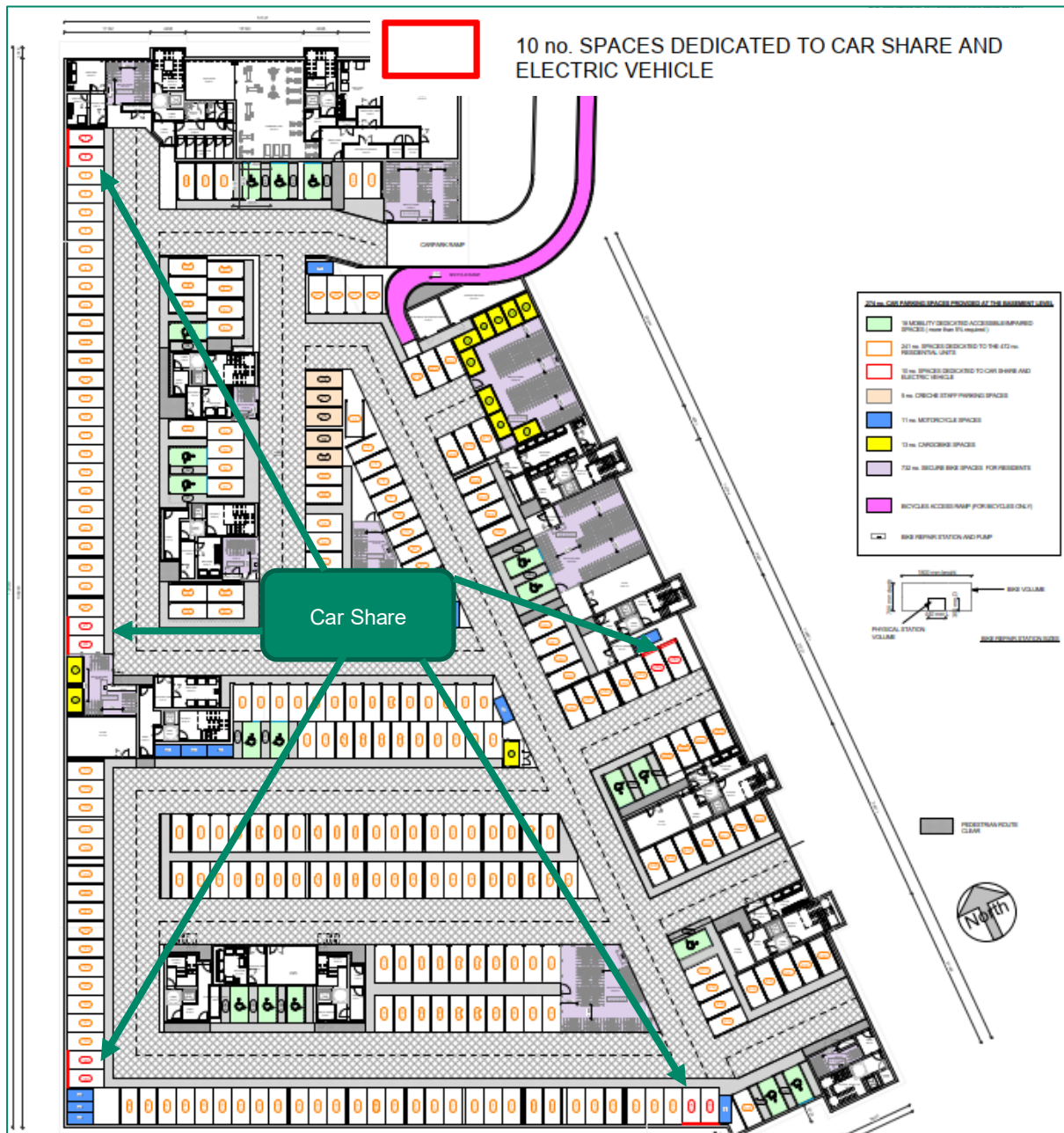


Figure 2.5 Car Share Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

- d) Demonstrate that all accessible parking spaces are located within close proximity of main entrances to the respective Blocks and crèche.

AECOM Response:

This can be seen on the architects basement plan (C+W O'Brien Drawing 092035) All the accessible parking spaces are located within close proximity of main entrances to the respective Blocks and crèche.

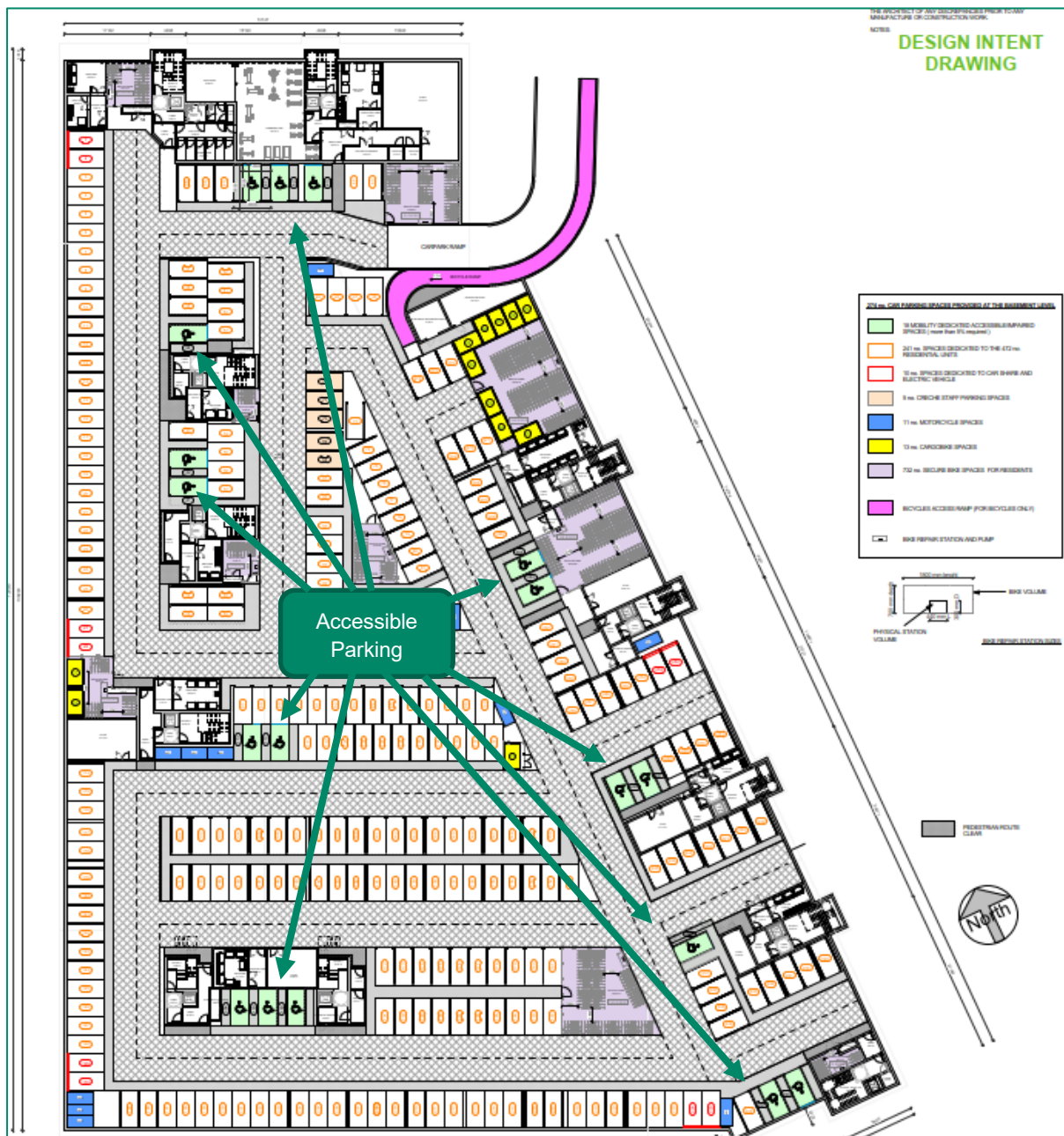


Figure 2.6 Accessible Parking Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

e) Provide a rationale for the proportion of crèche staff spaces at basement level.

AECOM Response:

There is no DCC parking ratio for a creche but schools are 1 space per classroom. There are 5 rooms in the creche therefore 5 creche parking spaces are proposed in the basement for staff. In the DCC Development Plan in table 16.1 it states that a maximum of 1 no. space per school classroom is to be provided for such a development use. The site is located in parking Zone 3 no. on Map J of the DCC Development Plan, stipulating the above standards relevant to the subject area.

2.8 Item 7 – Cycle Parking

Address the following bicycle parking issues:

a) The resident bicycle parking ratio of 1:1.1 is determined low having regard to the overall occupancy capacity of the scheme. Increase resident parking onsite.

AECOM Response:

The bicycle parking provision has been increased. For 472 apartments, there are now 732 secure spaces in basement. In addition, there are 14 cargo bike parking spaces. There are 236 visitor spaces provided at grade throughout the site.

The cycle parking now exceeds the Design Standards for New Apartment Guidelines provisions, for 723 total bedspaces, with visitor matching these guidelines with 1No. space per two apartments

These details are included on the architects basement plan (C+W O'Brien Drawing 092035) and below in Figure 2.7

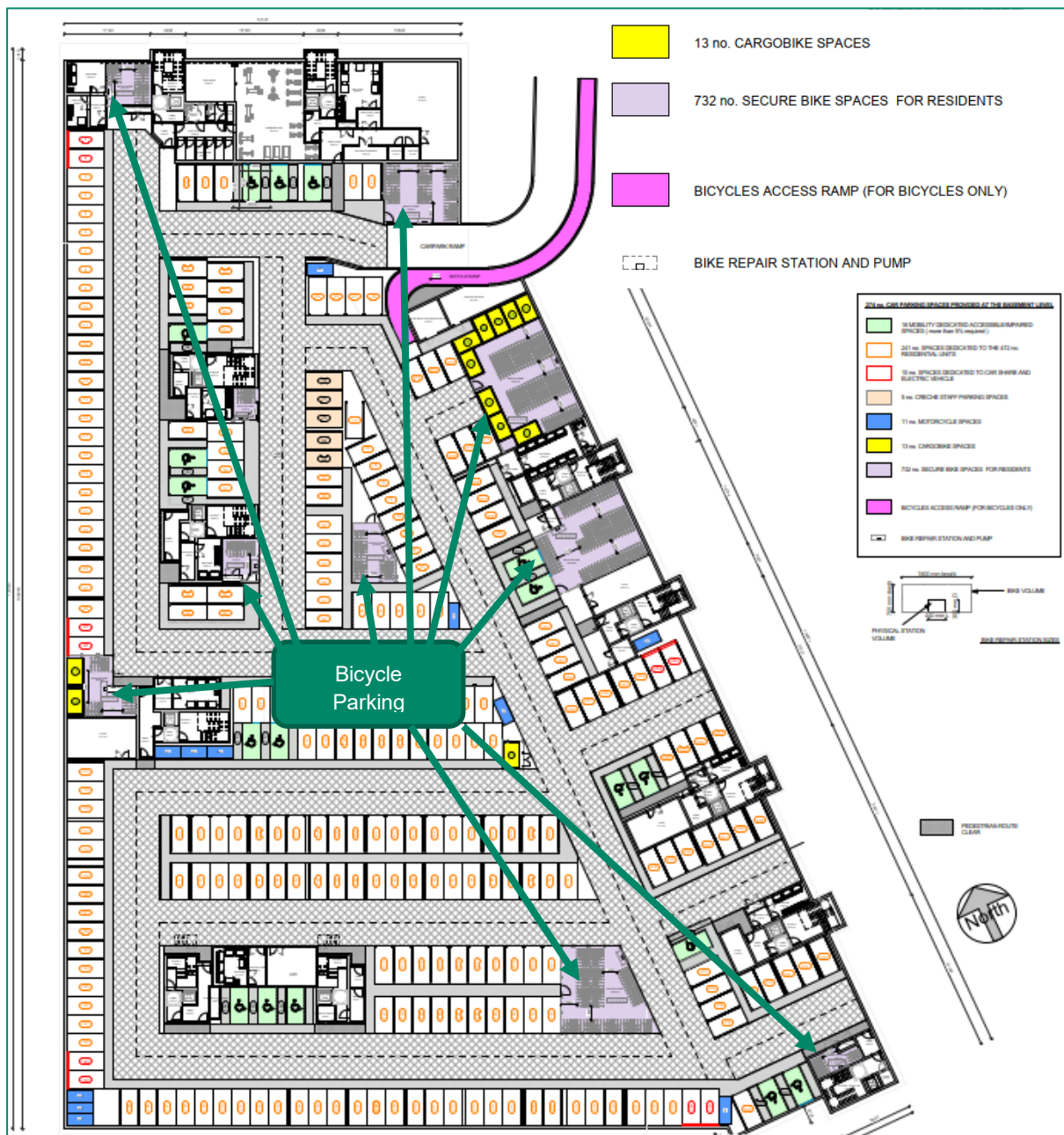


Figure 2.7 Bicycle Store Parking Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

b) 1,414 residents.

AECOM Response:

Nothing to comment on.

- c) *Provide details of the number of bicycles parking spaces per compound, type of bicycle parking stands proposed and demonstrate functionality of spaces ensuring ease of access/egress including sufficient space (min. 1.8 metres to the front for access if two-tierstands).*

AECOM Response:

There are 732 no. proposed secure bicycle parking spaces for residents . the location of these bicycle stroes are illustrated above in Figure 2.7. and drawing no. 092035

- d) *Provide parking for cargo bicycles.*

AECOM Response:

Parking for cargo bikes (14 No.) are included on the architects basement plan (C+W O'Brien Drawing no. 092035) and below in Figure 2.8

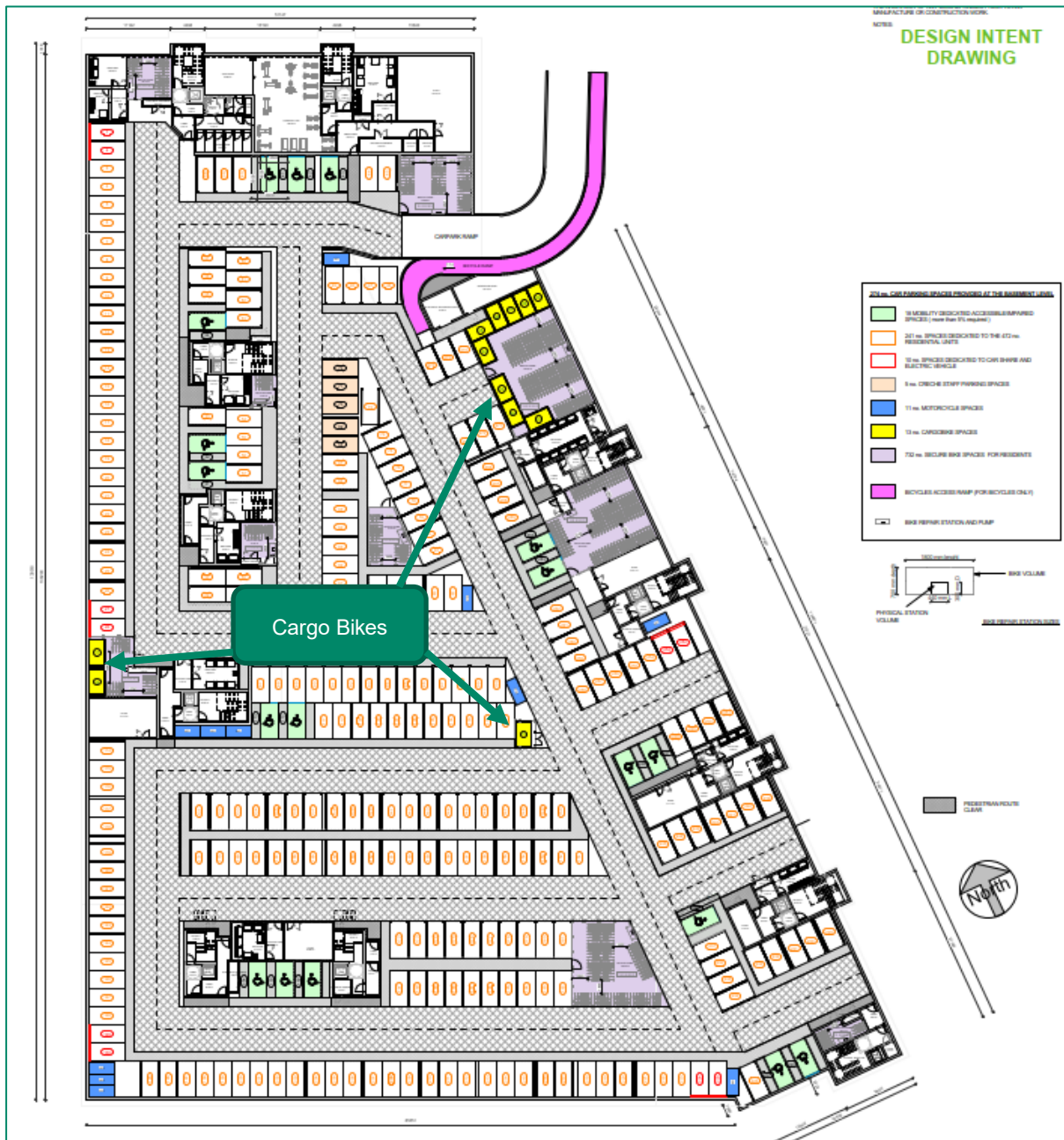


Figure 2.8 Cargo Bike Store Parking Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

2.9 Item 8 – Cycle Design and Layout

If it is proposed that cyclists share the basement ramp access with motor vehicles, the access ramp should include a separate lane clearly marked for the use of cyclists and be of sufficient width (e.g. 1.8m wide). In all cases, accesses to parking within a building should be well lit and motorists warned of the likely presence of cyclists by means of suitable warning signs and markings. Also consider the gradient and surface material of the access ramp for cyclists. A clearance headroom of minimum 2.4m should be provided wherever cyclists can be expected to be cycling their bikes.

AECOM Response:

A segregated ramp for cyclists providing a separate lane (2.0m) for cyclists is now included on the architects plans (C+W O'Brien Drawing-092035) and illustrated in Figure 2.9

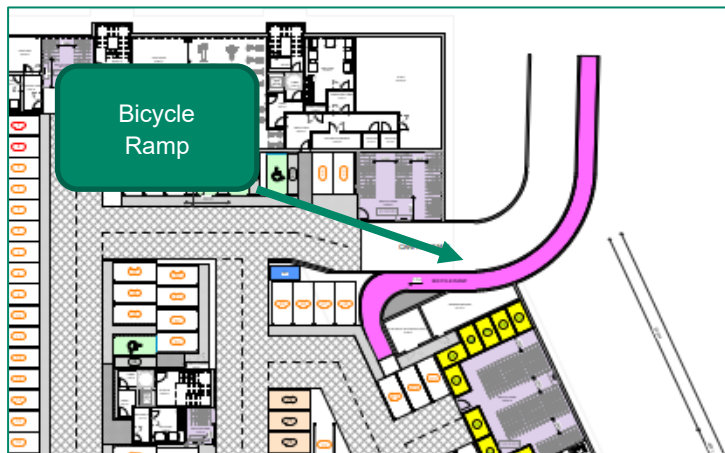


Figure 2.9 Bicycle Ramp Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

The basement parking facility will be well lit and signed appropriately for cyclists with headroom sufficient for cyclists (2.4m). Gradient of the ramp is 1:14 and a non-slip wear overlay will be applied to the top surface of the ramp.

2.10 Item 9 – Motorcycle Spaces

The provision of motorcycle spaces is below the Development Plan requirements. The applicant is requested to review motorcycle parking allocation ensure that designated motorcycle parking areas do not impede access to cycle parking stores and that all spaces are numbered.

AECOM Response:

14 No. motorcycling spaces have been allocated around the basement parking facility, representing circa 4% of parking as stated in the DCC Development Plan. All motorcycle parking does not impede cycle parking storage as per the basement plan. See architects basement plan (C+W O'Brien Drawing no. 092035) and Figure 2.10 below.

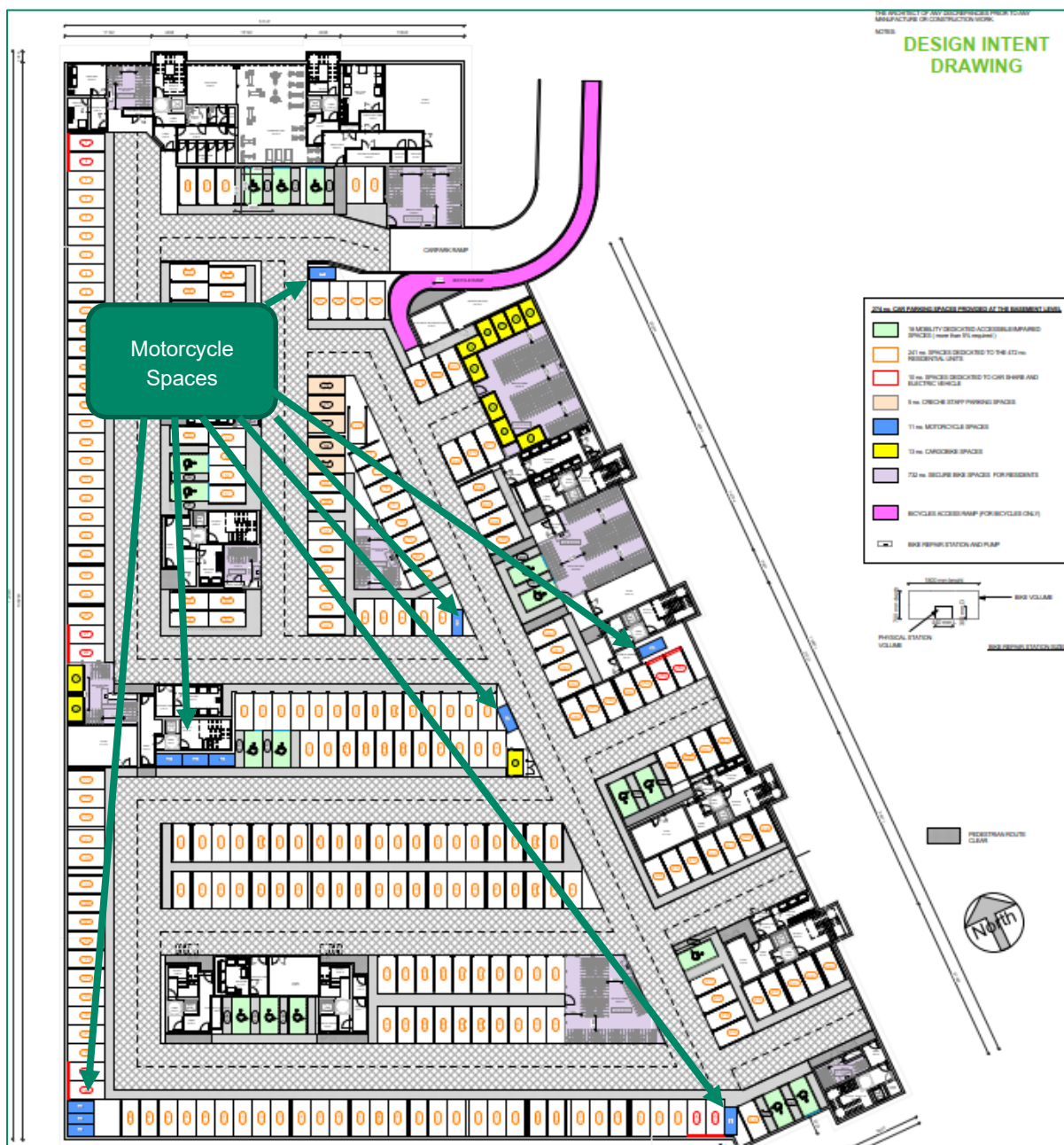


Figure 2.10 Motorcycle Spaces Basement Layout (Source: C+W O'Brien Architects Drawing No. 092035)

2.11 Item 10 – Internal Roads Layout

The following design and layout issues should be addressed:

- Revise the layout to be consistent with DMURS. The internal street (Road 2) is 6m in width and does not accord with DMURS. Having regard to the straight road alignment over ca.153m along the northern part of Road 2, additional vehicle speed calming measures should be incorporated.

AECOM Response:

The internal street has been reduced to 5.5 metres. The straight road alignment has been amended and now accords with DMURS (see revised DMURS Statement of Compliance in submitted Transport and Traffic Assessment).

- Enhance pedestrian crossing between Blocks F and G and the resident cycle stands.

AECOM Response:

This is now a shared surface to enhance pedestrian crossing between Blocks F and G and resident cycle stands (see revised DMURS Statement of Compliance in submitted Traffic and Transport Assessment).

- *Demonstrate access route by residents of Blocks F and G to basement level*

AECOM Response:

There are several footpaths available from Blocks F and G that allow access to the basement, through access points on the eastern side of Block E.

- *Provide pedestrian priority crossing across the entrance mouth to the basement car park. Appropriate road markings and signage should be incorporated;*

AECOM Response:

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We have provided a raised table with crossing facilities and the newly incorporated segregated cycle ramp leads to a raised table that will allow cyclists and pedestrians to cross safely. This negates the need to pedestrians (wheeling bicycles) to cross the entrance mouth of the car park.

- *Demarcated pedestrian/cyclist routes should be included within the basement layout design proposals to enhance pedestrian/cyclist safety.*

AECOM Response:

There are segregated areas for cyclists within the car park and a segregated ramp has been provided for cyclists for access/egress to the car park. These are shown in architects basement plan (C+W O'Brien Drawing HARTPL-CWO-BT-B1-DR-A-092001

2.12 Item 11 – Mobility management Plan

Submit a Mobility Management Plan which demonstrates that sustainable transportation will be supported and promoted within the development. The applicant is advised to consider innovative measures such as bicycle repair areas and a dedicated residential cargo/e-cargo bike share scheme.

AECOM Response:

AECOM have prepared a Mobility Management Plan (MMP) for the proposed site and this includes bicycle repair areas. There are 14 spaces for cargo bikes and MMP sets out the development of dedicated residential cargo/e-cargo bike share scheme. The MMP is submitted with this application

2.13 Item 12 - Car Parking

Submit a Car Parking Strategy and include information on onsite car parking management, car park space allocation, access and permits management.

AECOM Response:

The Car Parking Strategy including information on onsite car parking management, car park space allocation, access and permits management is included in separately submitted Car Parking Strategy.

2.14 Item 13 – Car Club

Submit a letter of commitment from a car club provider including a statement of intent stating the number of fleet vehicles that will be provided.

AECOM Response:

We have been in touch with a provider and their Letter of Intent is included in separately submitted Car Park Strategy which identifies they will provide 5 car club spaces.

2.15 Item 14 – Servicing/ Deliveries

Submit a Site Servicing and Operation Plan including includes details on estimated daily/weekly servicing and operational demands pertaining to residential, retail and crèche including showing set down delivery areas within the site.

AECOM Response:

The Site Servicing and Operation Plan including includes details on estimated daily/weekly servicing and operational demands pertaining to residential, retail and crèche including showing set down delivery areas within the site. This is included in separately submitted Site Servicing and Operation Plan.

2.16 Item 15 – Construction Management Plan

Submit a Construction Management Plan.

AECOM Response:

AECOM produced an Outline Construction Traffic management Plan within the TTA of this application. This is further detailed in a Construction Environmental Management Plan prepared by PUNCH Consulting Engineers and is submitted with this application.

Item 16 – Taken In Charge

The applicant is requested to outline any lands for Taking in Charge by Dublin City Council.

AECOM Response:

The Taken in Charge lands are shown in AECOM Drawing PR379360-ACM-XX-XX-DR-CE-20-0003 and below in Figure 2.11

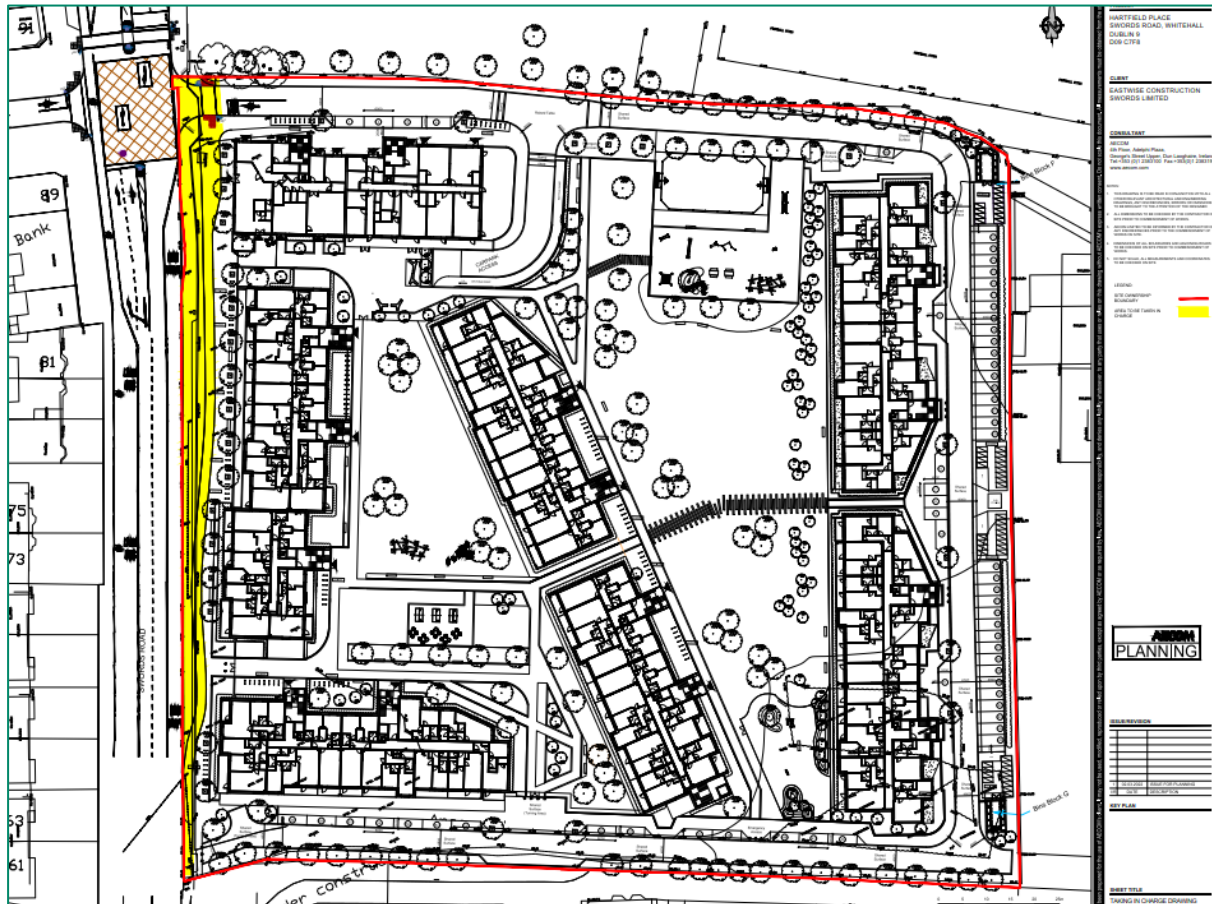


Figure 2.11 Taken in Charge drawing (AECOM drawing no. PR379360-ACM-XX-XX-DR-CE-20-0003)

3. AECOM Response to ABP Opinion

3.1 Introduction

Appendix B identifies each of the items raised ABP, in their Notice of Pre-Application Consultation Opinion. Transportation related items are contained in Items 1 and 2 and these are addressed below.

3.2 Item 1 – Bus Connects

1. *Drawings and documentation clearly describing the design and layout of the proposed junction with the Swords Road / Iveragh Road and proposed modifications to the existing road, footpath and cycle path networks. The application should demonstrate how the proposed development, will facilitate, and not interfere with, the implementation of Bus Connects proposals at this location.*

AECOM Response

The development proposes a new signalised access off Swords Road opposite Iveragh Road. This converts the existing three armed priority junction to a 4 armed signalised junction. This was previously shown in Figure 2.2 Proposed General Arrangement (AECOM Drawing PR379360-ACM-XX-XX-DR-CE-10-0001C)

Bus Connects proposals at this location were provided by DCC on 11th February 2022 and a design incorporating the requirements of Bus Connect and the site access have been developed. These have been issued to DCC/Bus Connects for comment and are included in AECOM Drawing PR379360-ACM-XX-XX-DR-CE-20-0003

3.3 Item 2 - DCC Matters

Any subsequent planning application should address the matters raised in the report of the Dublin City Council Transportation Planning Division dated 14th November 2021 and should be accompanied by the following:

- (i) Drawings clearly showing the proposed public footpath and cycle path along the Swords Road frontage of the site. Evidence of consent for all works to the public realm on lands outside of the applicant's landholdings should be provided.*
- (ii) A detailed Traffic and Transport Assessment (TTA).*
- (iii) A Mobility Management Plan and a Parking Management Strategy.*
- (iv) An operational service plan including a detailed swept path analysis. The plan should address inter alia, the management of car parking and drop-off movements associated with the proposed creche.*
- (v) Details of the quantum and design of bicycle parking / storage, in accordance with the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments.*
- (vi) A Quality Audit in accordance with Annex 4 of DMURS, including a Road Safety Audit. The Road Safety Audit should consider, inter alia, the design and layout of parking within the development, design of the Swords Road junction, and the movement of pedestrians and cyclists through the site.*
- (vii) A construction traffic management plan.*

AECOM Response:

The responses to items raised by Dublin City Council Transport Planning, as summarised above are included in section 2 of this report and associated separate reports. A detailed TTA was submitted to DCC in October 2021 and this has been revised to take account of changes such as those to the internal road and parking, as described in the DCC response, therefore the list of transport related reports submitted as part of this application is included below.

An updated TTA , including DMURS statement

A MMP and Parking Strategy will be submitted as part of this application

An Operational Service Management Plan included Swept Path analysis

Quality Audit including RSA

4. Summary & Conclusions

In summary AECOM have responded to the respective traffic items raised by Dublin City Council and ABP in relation to the proposed Strategic Housing Development at Hartfield Place, Swords Road

From the responses to each item it is clear that the proposed development will not result in a detrimental impact on the capacity, safety or operational efficiency of the surrounding road network.

Appendix A Dublin City Council Transportation Planning Division Response

ADDENDUM B

Opinion from other relevant Departments (DCC)

ABP – 311749 – 21

(DCC Ref: ABPSHDPAC0018/21)

Hartfield Place' Swords Road,

Whitehall, Dublin 9.

TRANSPORTATION PLANNING DIVISION

14th November 2021

SHD REFERENCE: ABPSHDPAC0018/21

LOCATION: 'Hartfield Place', Swords Road, Whitehall, Dublin 9

PROPOSED: The development will comprise an apartment development of 472 no. units within 7 no. blocks ranging in height up to 8 storeys in height (over single level basement) and comprising 32 no. studio apartments, 198 no.1-bed apartments, 233 no. 2-bed apartments and 9 no. 3-bed apartments. Provision of a crèche (c.445.8 sq.m), café (c.99 sq.m) and internal communal amenity space (c.511 sq.m) (including a reception area, meeting rooms, screening room, lounge, resident's gym, yoga room and ancillary areas. Provision of 353 no. car parking spaces, 575 bicycle parking spaces and 11 no. motorcycle spaces at basement/surface levels. Provision of a public open space, and communal open spaces at ground and roof levels. Provision of accesses to the development from Swords Road with associated upgrades to the existing public road and footpaths. Provision of hard and soft landscaping; bin storage; plant areas, ESB substations and switch rooms and all associated site development works and services provision.

FOR: Eastwise Construction Limited

TRANSPORTATION PLANNING DIVISION REPORT

Proposed Development

This is a SHD Pre-Application Consultation for the following:

- Construction of 472 no. units over 7 no. blocks comprising
 - 32 no. studio apartments
 - 198 no.1-bed apartments
 - 233 no. 2-bed apartments
 - 9 no. 3-bed apartments
- Provision of a crèche (c.445.8 sq.m), café (c.99 sq.m) and internal communal amenity space (c.511 sq.m) (including a reception area, meeting rooms, screening room, lounge, resident's gym, yoga room and ancillary areas.
- 353 no. car parking spaces at basement/surface levels;
- 575 bicycle parking spaces and 11 no. motorcycle spaces at basement/surface levels.
- Provision of a public open space, and communal open spaces at ground and roof levels.
- Provision of accesses to the development from Swords Road with associated upgrades to the existing public road and footpaths.
- Provision of hard and soft landscaping; bin storage; plant areas, ESB substations and switch rooms and all associated site development works and services provision.

Site Location & Context

The subject site is located on the eastern side of the Swords Road (R132), Whitehall, Dublin 9, approximately 170m south of the N1/Collins Avenue junction. The site has frontage with the Swords Road, along the west and adjoins the boundary along the north of Highfield Hospital. Vacant lands owned by Dublin City Council and Whitehall GAA playing pitches are located to the north, beyond which is Collins Avenue. Beechlawn Nursing home is located to the east, with residential development beyond. The Dublin Port Tunnel runs directly below the site, in a north to south direction. The site is located Swords Road is one of the city's principal arterial routes, providing connectivity between the city centre and the M1/M50

interchange and Dublin Airport. The site benefits from proximity to a high frequency bus corridor on Swords Road immediately west of the site which forms part of the proposed Bus Connects CBC Route 2/'A' Spine, providing bus connectivity between Swords and the city centre.

Planning History

Previous planning history noted.

Previous site planning history noted.

- ABP-309608-21 – **Permission refused** for SHD application for construction of 475 no. apartments, crèche and associated site works.
- There is a **live planning application** under Reg Ref.: 3766/20 which seeks to amend Block A permitted under Reg. Ref. 3269/10 / ABP Ref. PL29N.238685 (as extended by DCC Reg. Ref. 3269/10/x01 and amended by Reg. Ref. 3405/19). At the time of writing, this application is at the Clarification of further information status.
- There is an **extant permission** on the subject site, permitted under DCC Reg. Ref. 3269/10 / ABP Ref. PL29N.238685, for a mixed-use scheme that includes 358 No. residential units, 1 no. crèche and 2 no. commercial units located in 7 no. blocks ranging in height from part 4 no. to part 7 no. storeys. Under DCC Reg. Ref. 3269/10/X1, Dublin City Council granted permission for an extension of the duration of this permission until 2022. Under DCC Reg. Ref. 3405/19 Dublin City Council granted permission for an amendment to one of the blocks (Block F) comprising an increase in units in Block F within the development permitted under DCC Reg. Ref. 3269/10 / ABP Ref. PL29N.238685.

The proposed works under this SHD pre-application will result in an increase from the extant permission which permits 374 no. apartments to 472 no. proposed apartments and change of unit mix onsite. The maximum residential person occupancy for the scheme is 1,414.

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

TPD Comments

Dublin Tunnel

The subject site is located above the Dublin Tunnel corridor area and it critical that the applicant demonstrates that the structural integrity of the tunnel is not compromised as a result of the proposed works. The potential impacts of the development and Port Tunnel structural integrity should also be assessed in combination with other proposed and/or previously granted developments in the locality. The applicant is advised to refer to and accord with Dublin City Development Plan *Policy MT22* and Appendix 6. A Tunnel Impact Assessment has been prepared by AGL Consulting Engineering. The Tunnel Impact Assessment will need to be referred to Transport Infrastructure Ireland (TII) for assessment and observations. The applicant is advised to liaise with Dublin City Council Transport Planning Division to commence engagement with TII in advance of the submission of any forthcoming application.

Bus Connects

Under the most recent Bus Connects proposal (November 2020) for the Swords Road CBC, it is planned that the eastern side of the Swords Road boundary will be set back to facilitate the construction of a dedicated cycle lane together with the relocation of the existing pedestrian footpath which will be inset further east, resulting in land acquisition of a section of the western portion of the development site. This division has concerns regarding the level of separation between the western elevations of Blocks A, B and C and associated landscaping and services from the cycle track and public footpath following the revised

road layout under BusConnects. The applicant has submitted a plan with the inclusion of BusConnects proposals incorporated (Drawing PR379360-ACM-XX-XX-DR-CE-10-10104) and the width of the public footpath demonstrated appears excessively narrow in sections. Additional building and development public realm landscaping and servicing set back may be required.

Any forthcoming SHD application should be referred to the NTA to agree the proposed junction access and western boundary setback distances, having regard to the Bus Connects proposals along this section of the site. This division will facilitate engagement with the NTA prior to the submission of a final application, upon request of the applicant.

Access and Road Infrastructure Works

The main vehicular access will be at the north-west corner of the site which is located at the existing three-arm junction with Iveragh Road. The junction currently operates as a priority controlled minor arm with signal heads controlling the major arm. The proposed site access arrangements comprise a revised signalised junction layout of the existing three-arm junction of Swords Road and Iveragh Road. The proposal comprises (i) provision of a four-arm signalised junction with Swords Road and Iveragh Road (ii) incorporation of a new left filter turn and a right turn lane off Swords Road northern and southern arms respectively (iii) provision of pedestrian crossings to all arms of the new junction and (iv) provision of a pedestrian refuge island on the southern arm of the junction. The works also propose replacement of the existing public footpath along Swords Road on the eastern side immediately adjoining the site with a new cycle path and grass verge.

In addition a revised proposed site access has been provided with amendments to accommodate the proposed Bus Connects scheme which traverses immediately west of the site on the Swords Road.

This division has no objections in principle to the proposed upgrade of the existing Swords Road/Iveragh Road junction to a four-arm signalised junction subject to final agreement on design and layout with DCC Intelligent Transportation Systems (ITS). While the applicant states that the proposed site access arrangement has been agreed in principle with the National Transport Authority (NTA), in the event that a SHD planning application is forthcoming, it should be referred to the National Transport Authority (NTA) for comment.

The works also includes replacement of the existing public footpath along Swords Road with a cycle path and grass verge. Details of such are not adequately demonstrated on the supporting drawings with variations in design proposal across shown on supporting drawings. Greater details of such proposals are required for any further consideration by DCC. This division requires that a public footpath of 2.0 minimum width is retained under the charge of DCC along Swords Road. The applicant is requested to submit revised drawings showing the proposed new cycle path, grass verge and public footpath along the western boundary of the site on Swords Road. Details of all such works to the public realm on lands outside of the applicant's landholdings are subject to agreement with DCC. The applicant is advised that, in the event of a grant, all works to the public road would be at the applicant's own expense. This Division requires that these works are fully completed prior to occupation of the residential units, crèche or café.

Emergency Accesses

Clarity is required as to the number of emergency vehicle access points proposed onto Swords Road as drawing 'Autotrack Analysis of proposed Site Layout with Emergency Vehicle' conflicts with drawing title 'Autotrack Analysis of proposed Site Layout Option 3 with Bus Connects'. Justification should be provided for an additional two access points onto the Swords Road for emergency vehicles, compared to previously submitted applications with similar layout.

Accessibility and Permeability

In addition to the main site access at the Swords Road/Iveragh Road junction, there are a number of pedestrian and cycle accesses into the development from the western boundary along the Swords Road,

which is welcomed by this Division. Pedestrian footpaths along the western boundary should be a minimum of 2.0m in width to facilitate the increased footfall that will arise. Permeability through the development is considered of a good standard with potential future pedestrian/cyclist route throughway to the northeast of the site through to High Park and Grace Park Road. This permeability is welcomed feature of the design layout.

New residential development is proposed on lands immediately north of the site. This division would favour connectivity with lands to the north to facilitate for future pedestrian/cyclist and potentially vehicular and/or emergency vehicular access.

Traffic Impact

Despite the increase in apartment units from the extant permission onsite to 475 no. apartment units under this SHD proposal, the car parking provision has been reduced with 352 no. parking spaces serving the development. A Traffic and Transport Assessment (TTA) has been prepared by AECOM to accompany this pre-planning submission. This report includes Trip Generation and Distribution and Junction Modelling. The TTA includes details of traffic surveys (weekday classified junction turning counts) which were conducted by IDASO over a 12-hr survey period from 07:00 – 19:00 on Thursday the 3rd October 2019. The traffic survey was undertaken at Swords Road / Collins Avenue Signalised Junction; and Swords Road / Iveragh Road junction.

The results show that the proposed development will not significantly result in additional vehicular generation on the surrounding road networks and junction. Any forthcoming SHD application should include a Stage 1 Road Safety Audit assessing the site access and junction and the internal development layout, including basement car park.

Car Parking

Inconsistencies noted in the planning report, TTA and description of works in relation to the number of car parking spaces and breakdown of allocation. Consistency across all reports should be ensured. For the benefit of this report, the quantum specified in the description of works and TTA is assumed however clarity should be ensured at application stage.

A total of 353 car parking spaces are proposed on site of which 309 no. spaces are residential. This division requires that any forthcoming application is supported by a Mobility Management Plan to support a low-car dependant scheme and demonstrate innovative means by which sustainable transportation will be supported and promoted such as bicycle repair areas and a dedicated residential cargo/e-cargo bike share scheme.

No visitor spaces appears to be provided within the scheme. This division would require that visitor parking is catered for within the scheme having regard to the scale of the development and to avoid potential overspill of parking on neighbouring streets.

The quantum of accessible parking is satisfactory. The applicant should demonstrate that all accessible parking spaces are located within close proximity of main entrances to the respective Blocks and crèche. 10 no. spaces in total are allocated to the crèche (4 set down at surface level and 6 staff spaces). A rationale for the proportion of crèche staff spaces at basement level should be provided having regard to the site location and accessibility by public transport.

10 no. car club spaces are provided at surface level. The applicant should submit a letter of commitment from the car club provider(s) with any forthcoming application.

A Car Parking Strategy should accompany any forthcoming application and should include information on onsite car parking management, car park space allocation, admissions and permits management should be submitted with any forthcoming application in the form of a.

Car Club

A letter of commitment from a car club provider should accompany any forthcoming application including a statement of intent stating the number of fleet vehicles that will be provided at the opening stage of the development.

Cycle Parking

➤ Quantum

A total of 575 no. cycle parking spaces are proposed within the development to cater for the 472 no. residential units, and inclusive of visitor parking spaces. The proposed cycle parking spaces will comprise:

- 528 no. residential spaces;
- 47 no. visitor spaces at Ground Floor level in the form of Sheffield stands.

The Dublin City Development Plan sets out maximum bicycle parking standards for the 3 parking zones across the city. The application site is located within Area 3 where the applicable standard as per Table 16.2 of the Dublin City Development Plan 2016-2022 is 1 no. cycle parking space per unit. The 2018 Design Standards for New Apartments guidelines sets out a standard of 1 no. cycle parking space per bedroom and 1 no. visitor cycle space per 2 no. units, which in this scheme would equate to 723 no. residential cycle spaces and 236 no. visitor cycle spaces. As such the proposed quantum is compliant with the DCC Development Plan standards (472 no. spaces) but below the 2018 Design Standards for New Apartments guidelines. The ratio is 1.1 cycle parking space per unit. This Division would favour an increase in resident cycle parking having regard to the overall occupancy capacity of the scheme at 1,414 residents.

It is stated that management will monitor the usage of the cycle stands following the opening of the proposed development. Should demand meet the proposed level of cycle parking, it is stated that the management company will allocate additional cycle parking for the development. The supporting documentation states that there is 'ample space at surface level' to add more cycle stands following a review of the demand. This Division welcomes the monitoring of demand for cycle spaces; however, the site should at design stage be subject to a robust level of future proofing. This division would be concerned that any future allocation of space for cycle parking may result in a loss of amenity space or may result in cycle parking being located in areas of the site that are less amenable to passive supervision. The applicant should identify potential future cycle expansion parking locations onsite.

➤ Cycle Design and Layout

More detail is required on the proposed cycle parking stores at both basement and surface level. The applicant is requested to confirm the number of resident cycle parking spaces at surface and basement level and demonstrate that the proposed quantum can be facilitated within the allocated stores. Any forthcoming application should include details of the number of bicycles parking spaces per compound, type of cycle parking stands proposed and functionality of spaces ensuring ease of access/egress including sufficient space (min. 1.8 metres to the front for access if two-tier stands). Accessibility of some cycle stands within compounds appear inaccessible and should be reviewed. The number of cycle spaces per block should be detailed, ensuring sufficient parking within proximity of the respective block access points. Parking for cargo bicycles should be provided onsite.

If it is proposed that cyclists share the basement ramp access with motor vehicles, the access ramp should include a separate lane clearly marked for the use of cyclists and be of sufficient width (e.g. 1.8m wide). In all cases, accesses to parking within a building should be well lit and motorists warned of the likely presence of cyclists by means of suitable warning signs and markings. Also consider the gradient and surface material of the access ramp for cyclists. A clearance headroom of minimum 2.4m should be provided wherever cyclists can be expected to be cycling their bikes

Motorcycle Spaces

11 no. motorcycle spaces are proposed within the scheme which is below the Development Plan requirements, of a minimum 4% of spaces. Motorcycle parking areas should not impede access to cycle parking stores. Motorcycle spaces should be numbered.

Design and Layout Issues

Following assessment of the supporting site layout plans, this Division has a number of issues to highlight in respect of the layout and design. Below is a list of issues that should be addressed in advance of any forthcoming application:

- Revise the layout to be consistent with DMURS. The internal street (Road 2) is 6m in width and does not accord with DMURS. Having regard to the straight road alignment over ca.153m along the northern part of Road 2, additional vehicle speed calming measures should be incorporated.
- Enhance pedestrian crossing between Blocks F and G and the resident cycle stands.
- Provide pedestrian priority crossing across the entrance mouth to the basement car park. Appropriate road markings and signage should be incorporated;
- Demarcated pedestrian/cyclist routes should be included within the basement layout design proposals to enhance pedestrian/cyclist safety.

Swept Path Analysis

Swept path analysis drawings have been submitted for refuse vehicle and emergency vehicle. In the event that there are any amendments to the access junction or internal street layout, these should be reviewed and submitted with any forthcoming application.

Servicing/Deliveries

A Site Servicing and Operation Plan should accompany any forthcoming SHD application. The applicant has submitted some details on refuse collection servicing only. A more comprehensive plan should be submitted that includes details on estimated daily/weekly servicing and operational demands pertaining to residential, retail and crèche including showing set down delivery areas within the site.

Construction Management Plan

An outline Construction Management Plan (CMP) has been included within the TTA. The Plan should include details of the site compound and staging and pay particular attention to the new access junction and impact on traffic along the Swords Road owing to the high traffic flow along this section of the road. In the event of a grant of permission of any forthcoming SHD planning application, a CMP should be agreed in writing with the Planning Authority prior to commencement of any works onsite.

Taken in charge

The applicant is requested to outline any lands for Taking in Charge by Dublin City Council. The applicant is advised that details of design and finished materials will need to be agreed with the Roads Maintenance Division of Dublin City Council prior to any works being undertaken, and all works would be at the applicants own expense.

Conclusion

The principle of the proposed development is accepted by this Division. Below are issues that should be addressed in any forthcoming SHD application documentation:

1. The subject site is located above the Dublin Tunnel corridor area and as such the applicant is advised to refer to and accord with Dublin City Development Plan Policy MT22 and Appendix 6. The Tunnel Impact Assessment should be referred to Transport Infrastructure Ireland (TII) for

assessment and observations and the applicant is advised to liaise with TII on requirements to ensure the structural integrity of the tunnel is not compromised as a result of the works. The potential impacts of the development and Port Tunnel structural integrity should also be assessed in combination with other proposed and/or previously granted developments in the locality. The applicant is advised to liaise with Dublin City Council Transport Planning Division to commence engagement with TII in advance of the submission of any forthcoming application.

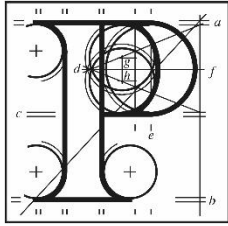
2. The proposed site access arrangement and western boundary proposals should be agreed with the National Transport Authority (NTA) to ensure that the proposals do not conflict with the Bus Connects proposals. This division can facilitate engagement with the NTA upon request from the applicant prior to the submission of a final application.
3. Submit a Road Safety Audit Stage 1 assessing the site access and junction and the internal development layout, including basement car park.
4. This division requires that a public footpath of 2.0 minimum width is retained under the charge of DCC along Swords Road. The applicant is requested to submit revised drawings on the proposed replacement of the existing public footpath with a cycle path and grass verge along Swords Road showing the proposed new cycle path, grass verge and public footpath along the western boundary of the site on Swords Road.
5. Clarity is required as to the number of emergency vehicle access points proposed onto Swords Road. Justification should be provided for additional emergency access points onto the Swords Road.
6. The applicant is requested to provide clarification on the following car parking arrangements:
 - a) Confirm the total number of parking bays to be allocated to residents;
 - b) Visitor parking is required to be incorporated onsite;
 - c) Indicate the proposed locations of designated Car Club spaces onsite;
 - d) Demonstrate that all accessible parking spaces are located within close proximity of main entrances to the respective Blocks and crèche.
 - e) Provide a rationale for the proportion of crèche staff spaces at basement level.
7. Address the following bicycle parking issues:
 - a) The resident bicycle parking ratio of 1:1.1 is determined low having regard to the overall occupancy capacity of the scheme. Increase resident parking onsite.
 - b) 1,414 residents.
 - c) Provide details of the number of bicycles parking spaces per compound, type of bicycle parking stands proposed and demonstrate functionality of spaces ensuring ease of access/egress including sufficient space (min. 1.8 metres to the front for access if two-tier stands).
 - d) Provide parking for cargo bicycles.
8. If it is proposed that cyclists share the basement ramp access with motor vehicles, the access ramp should include a separate lane clearly marked for the use of cyclists and be of sufficient width (e.g. 1.8m wide). In all cases, accesses to parking within a building should be well lit and motorists warned of the likely presence of cyclists by means of suitable warning signs and markings. Also consider the gradient and surface material of the access ramp for cyclists. A clearance headroom of minimum 2.4m should be provided wherever cyclists can be expected to be cycling their bikes.

9. The provision of motorcycle spaces is below the Development Plan requirements. The applicant is requested to review motorcycle parking allocation ensure that designated motorcycle parking areas do not impede access to cycle parking stores and that all spaces are numbered.
10. The following design and layout issues should be addressed:
 - a) Revise the layout to be consistent with DMURS. The internal street (Road 2) is 6m in width and does not accord with DMURS. Having regard to the straight road alignment over ca.153m along the northern part of Road 2, additional vehicle speed calming measures should be incorporated.
 - b) Enhance pedestrian crossing between Blocks F and G and the resident cycle stands.
 - c) Demonstrate access route by residents of Blocks F and G to basement level.
 - d) Provide pedestrian priority crossing across the entrance mouth to the basement car park. Appropriate road markings and signage should be incorporated;
 - e) Demarcated pedestrian/cyclist routes should be included within the basement layout design proposals to enhance pedestrian/cyclist safety.
11. Submit a Mobility Management Plan which demonstrates that sustainable transportation will be supported and promoted within the development. The applicant is advised to consider innovative measures such as bicycle repair areas and a dedicated residential cargo/e-cargo bike share scheme.
12. Submit a Car Parking Strategy and include information on onsite car parking management, car park space allocation, access and permits management.
13. Submit a letter of commitment from a car club provider including a statement of intent stating the number of fleet vehicles that will be provided.
14. Submit a Site Servicing and Operation Plan including includes details on estimated daily/weekly servicing and operational demands pertaining to residential, retail and crèche including showing set down delivery areas within the site.
15. Submit a Construction Management Plan.
16. The applicant is requested to outline any lands for Taking in Charge by Dublin City Council.

Róisín Ní Dhubhda
Executive Planner

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

Appendix B ABP Consultation Opinion



An
Bord
Pleanála

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Case Reference: ABP-311749-21

Proposed Development: 472 no. apartments, creche and associated site works. 'Hartfield Place', Swords Road, Whitehall, Dublin 9.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.

Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Drawings and documentation clearly describing the design and layout of the proposed junction with the Swords Road / Iveragh Road and proposed modifications to the existing road, footpath and cyclepath networks. The application should demonstrate how the proposed development, will facilitate,

and not interfere with, the implementation of Bus Connects proposals at this location.

2. Any subsequent planning application should address the matters raised in the report of the Dublin City Council Transportation Planning Division dated 14th November 2021 and should be accompanied by the following:
 - (i) Drawings clearly showing the proposed public footpath and cycle path along the Swords Road frontage of the site. Evidence of consent for all works to the public realm on lands outside of the applicant's landholdings should be provided.
 - (ii) A detailed Traffic and Transport Assessment (TTA).
 - (iii) A Mobility Management Plan and a Parking Management Strategy.
 - (iv) An operational service plan including a detailed swept path analysis. The plan should address inter alia, the management of car parking and drop-off movements associated with the proposed creche.
 - (v) Details of the quantum and design of bicycle parking / storage, in accordance with the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments.
 - (vi) A Quality Audit in accordance with Annex 4 of DMURS, including a Road Safety Audit. The Road Safety Audit should consider, inter alia, the design and layout of parking within the development, design of the Swords Road junction, and the movement of pedestrians and cyclists through the site.
 - (vii) A construction traffic management plan.
3. A Draft Construction and Waste Management Plan.
4. A Tunnel Impact Assessment having regard to Policy MT22 of the Dublin City Development Plan and Appendix 6 thereof, with regard to the Dublin Port Tunnel. This assessment should be accompanied by a Construction Management Plan and Method Statement in accordance with the requirements of Transport Infrastructure Ireland (TII).
5. An assessment of the noise environment and an Acoustic Design Statement demonstrating that adequate levels of residential amenity will be achieved for future residents of the development and of adjoining properties.

6. A report which addresses the matters raised in the report of the Dublin City Council Drainage Division dated 4th November 2021.
7. A comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision, including in particular accommodation at ground and first floor levels. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified, and their effect appropriately described and / or quantified.

8. A report that addresses issues of residential amenity (of both future occupants and occupants of adjacent development), specifically with regard to overlooking, overshadowing, visual impact and the potential effects of flood lighting of adjoining playing fields. The report shall include cross-section drawings showing the relationship between the proposed development and adjoining development.
9. A detailed rationale for the proposed housing mix having regard to the provisions of the current Dublin City Development Plan and relevant national and regional planning policy.
10. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.
11. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of external finishes, the treatment of balconies and boundary treatments. Particular regard should be had to the

requirement to provide high quality and durable finishes and materials which have regard to the surrounding context of the site.

12. A Building Lifecycle Report in accordance with section 6.13 of the guidelines should also be submitted and shall detail the appropriate use of external materials on all elevations. The plan shall also address the management and maintenance of public spaces and access to the development.
13. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. **Minister for Housing, Local Government and Heritage**
2. **An Taisce- The National Trust for Ireland.**
3. **The Heritage Council.**
4. **Irish Water**
5. **National Transport Authority (NTA)**
6. **Transport Infrastructure Ireland (TII)**
7. **Dublin City Childcare Committee**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
Assistant Director of Planning
January, 2022

