



The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

28th April 2022

Re: Case No. 313129 – 633 no. Build to Rent apartments. Former Chadwick's Builders Merchant development, South of Greenhills Road, North of the existing access road serving Greenhills Industrial Estate, Walkinstown, Dublin 12

Dear Sir / Madam,

The National Transport Authority (the “NTA”) has reviewed the above planning application based on the *Transport Strategy for the Greater Dublin Area 2016-2035* (the “Transport Strategy”) and the *National Cycle Manual* and submits the following observations and recommendations.

Bus Connects and Public Transport Accessibility

The subject site is located on part of Corridor 9, Greenhills to City Centre, of the NTA’s Core Bus Corridor (CBC) Project, as provided for in the Transport Strategy for the Greater Dublin Area. A preferred route option for the corridor was published by the NTA and was the subject of public consultation on several occasions, the most recent of which was in November 2020. The proposed SHD should not compromise the Tallaght / Clondalkin to City Centre BusConnects Scheme as detailed in the most recent ‘Preferred Route’ report.

(See: <https://busconnects.ie/wpcontent/uploads/2022/03/09-greenhills-to-city-centre-preferred-route-221120fa-web.pdf>)

In the event of a grant of permission, the applicant should be required to liaise with the NTA and reach agreement on the design of the road layouts, boundary treatments and associated infrastructure, in order to support the implementation of the CBC. In particular, the following should be addressed:

Access to the development

The Greenhills Road bounds the proposed development along its northern boundary with the main access provided by a proposed new priority junction arrangement approximately 80m west of the existing access road to Greenhills Industrial Estate.

- The applicant is proposing a new access off Greenhills Road in close proximity to other entrances which will be intensive in terms of vehicular trips. This has the potential to result in significant traffic increase on the Greenhills Road which could negatively impact on cycle and bus operations along this proposed core bus corridor.

It is noted that a junction traffic analysis has not been provided within the applicants Transport Assessment for the proposed priority junction off Greenhills Road. Therefore, no evidence has been provided to demonstrate that the proposed design caters for the proposed trip generation i.e., to demonstrate that the entrance does not require a signalised junction / dedicated right-turn lane such that bus priority is not compromised.

From a BusConnects perspective, it would be preferable to provide vehicular access/egress to this development from the Greenhills Industrial Estate Road. Consideration should be given to a cycling and pedestrian access only off Greenhills Road which may be more favourable in terms of providing safe access to the development for cyclists and pedestrians.

- In connection with the above, it is considered that a development proposal of this scale may necessitate provision of a new Bus Stop to serve the growing population. Further consideration of safe and convenient access to public transport stops should be demonstrated including providing for a bus stop.

Road Widening and associated infrastructure

The Tallaght / Clondalkin CBC Scheme requires widening of the existing Greenhills Road for a length of approximately 95m at this location including a retaining wall structure north and south of the Greenhills Road.

- It is not clear that sufficient consideration has been given to accommodate the future widening of Greenhills Road in line with the current proposals for the Tallaght/Clondalkin to City Centre CBC scheme. Similarly, any associated retaining infrastructure required within the boundary as part of proposed the new priority junction off Greenhills Road do not appear to have been incorporated to reflect the future CBC Scheme. (See Foundations Structure and Key Plan Drawing 20189-LDE-ZZ-ZZ-DR-SC-3S01 submitted as part of the planning application)
- Clarification is required regarding proposed boundary treatments and the extent of proposed retaining structures. The potential impact of construction revised loading in conjunction with the BusConnects proposals over the existing 1200mm diameter watermain should also be considered.
- The proposed SHD should not compromise the Tallaght / Clondalkin to City Centre BusConnects Scheme shown for the Third Public Consultation from November 2020 (<https://busconnects.ie/wpcontent/uploads/2022/03/09-greenhills-to-city-centre-preferred-route-221120fa-web.pdf>) where the proposed CBC road cross- section requires widening to accommodate works at this location. (Figure 2-7, Map 17 of NTA Greenhills to City Centre Preferred Route report)

Car Parking

The NTA notes the proposed provision of 398 car parking spaces plus 21 no. disabled spaces to serve the 633 residential units, giving a ratio of 0.66 per unit. While this quantum would fall within the development plan standard of a maximum 0.75 per 1 bed unit and 1 per 2 bed unit (Zone 2), the NTA requests that An Bord Pleanála consider the appropriateness of providing such a number, in particular in the context of section 4.21 of the *Design Standards for New Apartments* guidelines which states that for proposed residential development in 'Intermediate Urban Location', *'the Planning Authority must consider a reduced overall car parking standard.'* Given the location close to a high frequency bus corridor in the region, and the associated low level of demand for car use anticipated, a more restrictive provision could be applied. This would also reduce the negative impact of traffic generated by the development on the surrounding road network.

Recommendation

It is recommended that the assessment of the application gives consideration to the concerns raised above and that, in the event of a grant of permission, these concerns are addressed by way of conditions. In particular, the applicant should be required to liaise with the NTA and reach agreement on the design of the road layouts, boundary treatments and associated infrastructure, in order to support the implementation of the CBC.

I trust that the views of the NTA will be taken into consideration.

Yours sincerely,



Michael MacAree
Head of Strategic Planning