

Aughamore
Carraroe
Co. Sligo
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The Secretary
An Board Pleanála
64 Marlborough Street
Dublin 1

15th June 2022

Reference No. TAO6S.313590

Re: Development at Greenhills Road, Tallaght, Dublin 24.

Dear Sir /Madam,

We wish to submit for your consideration the following observation /submission regarding an application to An Bord Pleanála by Greenhills Living Limited, for development on Lands at Greenhills Road, Tallaght, Dublin 24.

Our company, Merrick Properties Limited, owns the property Greenhills Retail Park, situated directly north of the proposed development site. We wish to express our concerns on our own behalf and on behalf of the occupiers, especially Pieta House and Enable Ireland whose offices are situated on the 1st and 2nd floors in our property. Pieta House Head Office and Pieta House Mental Health Clinic are situated on the first floor of Greenhills Retail Park. Enable Ireland offices are on the second floor of the property. Both floors of offices are facing onto the proposed development. Both charities have psychiatric and disability patients calling to their offices daily. The entrance to the offices and the underground car parking is from the rear of Greenhills Retail Park and directly off the proposed vehicular entrance to the proposed development site. Other occupiers of Greenhills Retail Park are ABC Tanning, Pizza Hut, Subway, Daybreak Convenience Store, Fiona Todhunter Bridals and Stuart's Mazda Car Showroom. Approximately 200 people work in Greenhills Retail Park and up to 1,000 people visit Greenhills Retail Park daily.

Our main concerns are as follows,

1. Proposed Vehicular Entrance.

The proposed development consists of 197 apartments, 4 commercial units, a creche and 78 car parking spaces.

Our company owns all the road network on our site at Greenhills Retail Park. There is a right of way access at the rear of Greenhills Retail Park to the proposed development site. This private right of way road on our property has been used almost exclusively over the past 15 years by the occupiers of our property. It is the only access road to the offices on the 1st and 2nd floors and to the underground car park at Greenhills Retail Park.

This access road is 75 metres in length. It has an average road width of 5.5 metres, with a width of 5.0 metres at its narrowest point. There are two bends on this 75-metre right of way access road. There are 5 visitor and disabled car parking spaces adjoining the access road and adjacent to the entrance to the Pieta House and Enable Ireland offices. 52 metres of the access road has a pedestrian footpath, and 23 metres has no pedestrian footpath or kerb. Therefore, pedestrians must walk on the side of this access road to gain entry to our offices and to the proposed development site. See **Figures 1, 2 and 3** at the end of our observation.

There is a 12-metre ramp sloping upwards, at a 17-degree angle on exiting the underground car park of Greenhills Retail Park. This ramp joins directly on to the access road. A 3-metre-wide part of the access road is sloping downwards towards the ramp to the underground carpark entrance. There is a 7-metre sight line of vision for cars coming from the underground carpark, to see traffic approaching from the proposed development. It would be extremely difficult, if not impossible, to see approaching traffic coming from the proposed development, while driving from the underground car park at Greenhills Retail Park. This is a major road safety issue. See **Figures 4 and 5** at the end of our observation.

The proposed development consists of 197 apartments, 4 commercial units, a creche and 78 car parking spaces. This would give rise to hundreds of additional cars, delivery vans and trucks travelling on the access road daily. The access road was never built for this volume of traffic. There is no pedestrian footpath on part of this access road, and this will cause a major health and safety risk to pedestrians and cyclists, accessing the proposed development and pedestrians and visitors entering and exiting the offices of Pieta House and Enable Ireland, in Greenhills Retail Park.

We feel the traffic and transport assessment report submitted with the planning application, has grossly underestimated the volume of traffic likely to be generated by the proposed development. The cumulative impact of the traffic resulting from the development has not been considered in conjunction with the existing traffic currently using the access road at Greenhills Retail Park. The report fails to consider the cumulative traffic on the access road.

While we fully understand there is a right of way over our property to the proposed development site, we feel it is not suitable or safe, for the scale of the proposed development. Given the existing design of the access road, the width of the road, the underground car park entrance, and no pedestrian footpath on part of the road, it is obvious that the access right of way road is not fit for purpose to accommodate the scale of the proposed development, together with existing traffic to Greenhills Retail Park.

This vehicular access to the proposed development site, will pose a major health and safety risk. It will put the safety and the lives of the occupants and visitors to Greenhills Retail Park at a considerable risk. A direct vehicular access to the proposed development site on to the Greenhills Road, would solve this health and safety issue.

While the traffic and transport assessment report submitted with the planning application is comprehensive, we feel the vehicular access issue on the right of way road over our property has not been properly addressed. It does not state that the average width of the road is 5.5 metres, and that the road is only 5 metres wide at one point. It does not address how cars, delivery vans and service trucks can meet, while pedestrians and cyclists are also using this part of the road. It does not consider the cumulative effect on the existing traffic on the access road.

There are no plans or consent given by our company, to alter the existing right of way access road.

Professional Advice

Due to our serious concerns with the proposed access to this large development via the narrow road at the rear of our property we engaged the services of a road consultant to prepare a review. I attach their correspondence for your information.

2. Daylight / Sunlight Shadowing

Greenhills Retail Park and office building is 3 stories high and situated directly north of the proposed development. The proposed development is 8 stories high and situated directly south of Greenhills Retail Park. If the proposed development is built as planned, it would overshadow our property during office hours and result in the cutting off of daylight and sunlight from the Pieta House offices on the 1st floor and Enable Ireland offices on the 2nd floor of Greenhills Retail Park.

We would ask An Bord Pleanála to have a maximum height of 3 stories on the proposed development. Alternatively have a stepped level height on the proposed development, grading down to 3 stories at the northern end of the development. This would reduce the overshadowing effect on our building and allow some daylight and sunlight to the offices in Greenhills Retail Park.

3. ESB Sub-station

We note the planning application proposes to demolish the existing ESB substation on the proposed development site. We wish to point out that the said ESB substation, serves the electricity supply to Greenhills Retail Park, situated directly north of the proposed development. We always require an uninterrupted supply of electricity to our property. We have therefore, concerns regarding the proposed demolition of the ESB substation.

Conclusion.

We feel the proposed development will have a major health and safety impact on the occupants, customers, and patient visitors to Greenhills Retail Park, both during construction and after completion of the proposed development. We feel the proposed vehicular entrance to the development lands is totally inadequate and unsuitable for the scale of the proposed development. Personally, I have been using this narrow access road for some years and as it is, it poses difficulty if I meet other users of my property entering/exiting the underground carpark, or indeed the parking spaces directly off the road. I have not experienced a similarly narrow access to an underground carpark elsewhere. We dread to think how it would operate with additional traffic, particularly unfamiliar users and trucks.

We feel the height and overshadowing effect of the proposed development will have a major negative impact on the health and wellbeing of the staff of Pieta House, Enable Ireland, and the other occupants of Greenhills Retail Park.

We feel the development will have a very negative impact on our property and on the safety, health and wellbeing of its occupants.

We therefore ask you to refuse this proposed planning application on the above grounds.

We would like to thank An Bord Pleanála for your consideration of our submission /observation and we hope you will take our concerns into account when making your decision.

We are attaching the amount of €20 as the prescribed fee in respect of our submission.

This submission is made on behalf of the owners and occupants of Greenhills Retail Park.

Kind Regards



Noel Merrick

Merrick Properties Ltd



Figure 1



Figure 2



Figure 3



Figure 4

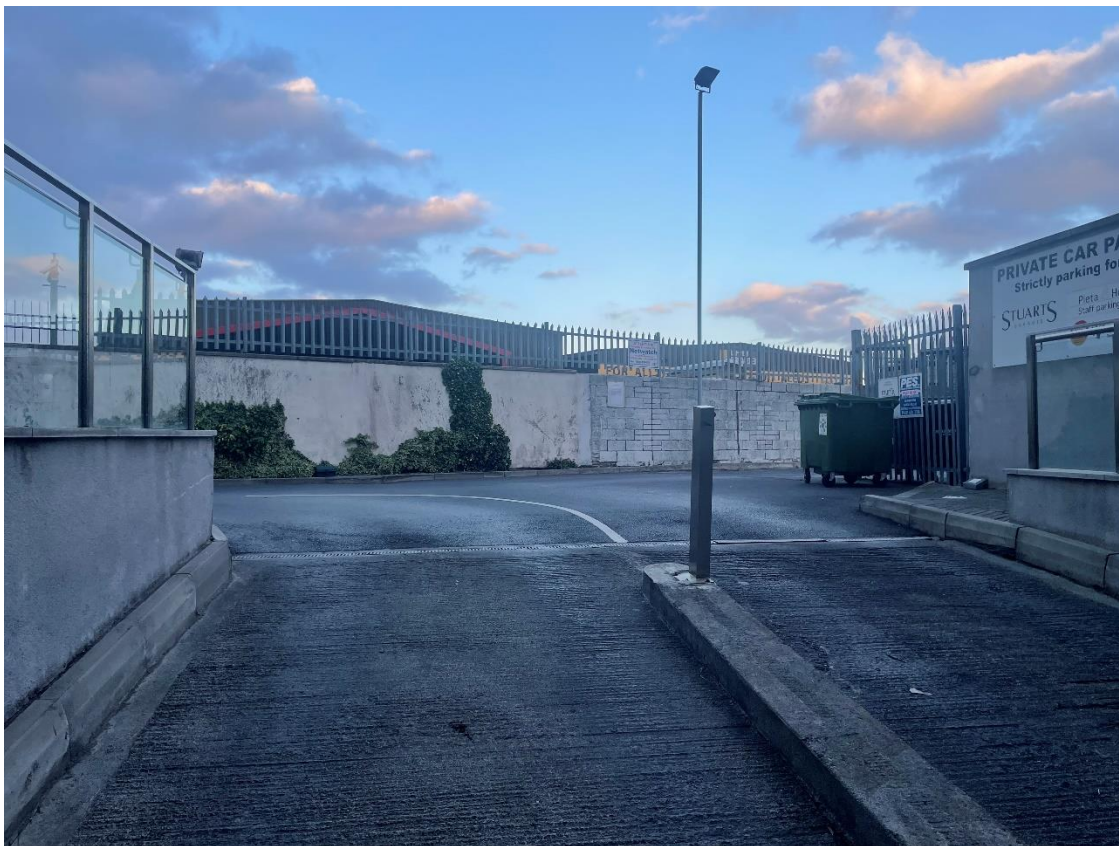


Figure 5



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The Secretary
An Board Pleanála
64 Marlborough Street
Dublin 1

Our Ref: 122226/FF
Your Ref: **TAO6S.313590**
Date: 15/06/2022
By: Email

RE: TAO6S.313590 Development at Greenhills Road, Tallaght, Dublin 24

Dear Sir/Madam

We have been engaged by Merrick Properties Ltd, the owner of Greenhills Retail Park, to review the proposed development at Greenhills Road, Tallaght, Dublin 24, reference **TAO6S.313590**, from a roads and traffic perspective.

The proposed development consists of 197 apartments, 4 commercial units, a creche and 78 car parking spaces to the south of Greenhills Retail Park. The vehicular access proposed is via an existing narrow passageway off Hibernian Industrial Estate Road to the east of Greenhills Retail Park building. (It is noteworthy that the Proposed Site Plan drawing calls this up as Greenhills Road, lest any confusion be caused.) This passageway, which currently predominantly serves only Greenhills Retail Park (our client's building), is owned by our client with a right of way to the proposed site to be developed.

Existing Access Road

The existing access road is approximately 75 metres long. It is narrow with 2 sharp bends, with a width of 5 metres at its narrowest point. There are 5 visitor and disabled car parking spaces directly off the access road and adjacent to the entrance to the Pieta House and Enable Ireland offices. There is a narrow path for approximately 50 metres from Hibernian Industrial Estate Road with no path continuation, or indeed kerb, for the remainder. Therefore, currently pedestrians must walk on the side of this access road to gain entry to the existing offices. See **Figures 1, 2 and 3** which show the existing scenario.

Any additional vehicular traffic would mean these pedestrians would be at greater risk. Furthermore, the development traffic would contain large delivery vehicles and the increase in pedestrian use resulting from the development would also increase the risk further.

Whilst mentioned above that the road is only 5m wide at its narrowest this restricted width is further compounded by the fact the existing poles for the public lighting are right next to the carriageway. Generally, these are an absolute minimum of 450mm from traffic to allow traffic to safely use the available carriageway width. The bends in the alignment, which are more "kinks" than designed curves, also mean the carriageway strictly available at these locations is further reduced.



Figure 1 Looking south along the existing access road



Figure 2 Looking north along the existing access road



Figure 3 Looking south at the end of the access road where the road drops down to the carpark

Existing Underground Carpark

The current arrangement of the access road effectively terminates within the existing basement carpark of Greenhills Retail Park and it appears it was designed in this way to principally serve this carpark. This end of the access road has a marked centreline which turns into the carpark giving priority to traffic entering and exiting the carpark. This is important for a couple of reasons

- 1 there is virtually no sight visibility available on exiting the carpark due to existing walls and
- 2 there is no “level” dwell area on exit from the carpark where it would be safe to stop and take off again.

Hence, any traffic coming from beyond the existing carpark must yield to traffic entering/ exiting this carpark. At present there is virtually no such traffic, with the development site being currently used only for some car storage as part of the Mazda car sales.

The existing levels of the access road are such that the ramp out of the carpark continues into the carriageway to ease the exit for users of the carpark. Any use of this road for development traffic beyond would mean they have to travel through a “dip” in the vertical alignment and could lead to unsafe manoeuvres.

The current general arrangement of the existing access is such that the underground carpark is at right-angles to the access road and any traffic coming from the proposed development beyond the carpark may not stop to yield to cars exiting the carpark as their path would be on the straight road. This could be a significant safety issue.



Figure 4 Ramp down to existing carpark



Figure 5 Ramp up from existing carpark

Traffic and Transport Assessment (TTA)

Whilst 2 junctions on Greenhills Road have been analysed for capacity within the TTA the existing junction of the access onto Hibernian Industrial Estate Road has been excluded.

Traffic Generation

The TRICS data used to predict the traffic generated by the development is not presented in the TTA. The trip rates/traffic volumes appear low compared to a quick TRICS analysis we have carried out for apartment developments throughout Dublin. This development is well removed from the city core, being outside the M50, and thus higher than average trip rates would be expected.

Proximity of Junctions

We note that the distance from the Greenhills Road/ Hibernian Industrial Estate Road to the junction with the access would only allow for 5 cars to queue within a lane at the traffic signals before queuing across the access. The TTA states the average queue on this arm of the junction will be 7 cars and thus the 95th percentile will be much higher. Thus, with the assumed traffic generation used in the TTA (which could be on the lower side) it predicts queuing past the existing access junction. This could cause congestion/ safety issues on the Industrial Estate Road with the potential to have a knock-on effect on Greenhills Road. The existing junction onto Hibernian Industrial Estate Road should be analysed and furthermore the modelling should include for its potential impact on the Greenhills Road/ Hibernian Industrial Estate Road junction and vice versa.

Any queuing delays on the Industrial Estate Road could impact the operation of the existing access road which, with its narrow width and alignment, will be reliant on traffic clearing to allow larger vehicles to pass opposing traffic at the narrowest/ bendiest sections.

Construction Traffic

The TTA makes no reference to Construction Traffic. The narrow width and poor alignment of the proposed access does not make it at all suitable as a construction access, and this is compounded by the fact it will be a live access to the existing parking both underground and directly off the access. An alternative access will be required.

Road Safety Audit (RSA)

It is unclear if the RSA submitted with the application has considered the existing access road, which is outside the redline for the development, or construction traffic.

“3.3 Basement Access” of the RSA states that *“the 2 direction access way for vehicles in the under-croft parking is not appropriate width for pedestrian access”* and recommend *“the plans should clearly identify no person will need to enter or exit the carpark by foot using the vehicle entrance”*. This safety issue relates to the proposed carpark, which is beyond the existing access road, and indeed wider than the access road. However, all this under-croft parking vehicular traffic, plus

- 1 the additional proposed development vehicular traffic for the Creche, commercial units, etc, that does not use the basement carpark and
- 2 the existing vehicular traffic to the current Greenhills Retail Park carparks

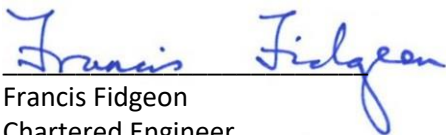
will pass on the existing narrow, shared carriageway where no footpath exists. If the wider under-croft access is deemed unsafe for use by pedestrians where there is less vehicular traffic it presumably follows that, where there is a greater volume of vehicular traffic passing, the existing shared, narrower, access road is unsafe. In this location, where existing pedestrians accessing the offices of Greenhills Retail Park, together with the future pedestrians associated with the proposed development, must walk within the narrow carriageway, it is noteworthy that there are existing parking spaces directly accessed off the road, that are used by wheelchair permit holders and patients of the existing tenants.

The existing access needs to be reviewed on this basis for its suitability to cater for pedestrian access here – as stated earlier it is questionable if it is suitable for the increase in vehicular traffic even without pedestrians sharing.

Quality Audit

The Quality Audit submitted with the application states "*pedestrians can also enter from the sole vehicle route to the north via a shared surface*". This gives the impression of a special treatment for this area but it is outside the application redline and no details appear on the drawings submitted with the application. The audit also goes on to say "*the drawings provided for audit indicate a shared pedestrian and cycle pathways through the site via the vehicle entrance.*" There is insufficient room for such shared pedestrian and cycle pathways between the existing building and its boundary to the east.

Yours sincerely

A handwritten signature in blue ink that reads "Francis Fidgeon". The signature is written in a cursive style and is positioned above a horizontal line.

Francis Fidgeon
Chartered Engineer