



Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin 2,
D02 WT20.

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

21st June 2022

Re: Case No. 313606 – 334 no apartments to include 118 BTR at ABB, Belgard Road, Dublin 24.

Dear Sir/Madam,

The National Transport Authority (the “NTA”) has reviewed the above planning application on the basis of the ‘*Transport Strategy for the Greater Dublin Area 2016-2035*’ (the “Transport Strategy”), which is a material consideration for planning in the Greater Dublin Area, and wishes to make the following observations and recommendations.

The subject application is for high density residential development located within the built-up metropolitan area of Dublin and represents an opportunity to consolidate development into an area where future residents could potentially avail of a range of services, without the use of the private car. As such, the NTA is not opposed to the proposed development in principle however the NTA has a number of concerns with regard to the following:

Bus Connects

The site is bounded by Belgard Road (R113) to the east, Belgard Square North to the North, Belgard Square East to the west, and by Clarity House to the south. Both Belgard Square East and the roundabout forming the junction with Belgard Square North are part of Corridor 9, Greenhills to City Centre, of the NTA’s Core Bus Corridor (CBC) Project, as provided for in the Transport Strategy. The level of public transport accessibility to the site will be further enhanced by the Core Bus Corridor (CBC) project and the associated on-going Dublin Area Bus Network Redesign.

The preferred design for CBC9 was subject of a third round of public consultation in November 2020. Subsequently, the NTA have been finalising the preferred route option designs and are preparing transport and environmental impact assessments which will culminate in the preparation of an Environmental Impact Assessment Report (EIAR) for the scheme together with details of land to be acquired. It is intended that this will be submitted to An Bord Pleanála later this year for consideration and determination. A formal statutory consultation process will be undertaken as part of that process and, as such, plans for this corridor have not yet been finalised.

The NTA note Drawing CS Consulting BR-CSC-ZZ-00-DRC-0015, *'Proposed Development Coordination with Bus Connects,'* and Drawing PE19150-CWO-ZZ-00-DR-A-0104 *'Taking in Charge Plan'*. As illustrated in these drawings the proposed development includes for the relocation of the site entrance on Belgard Square East and for the taking in charge of the area of land from the site boundary to the proposed building façade on Belgard Square East.

It is the view of the NTA that the proposed design accommodates the current preferred design for the CBC at this location. It is also the view of the NTA that the relocation of the site entrance on Belgard Square East as proposed can be accommodated in the BusConnects Scheme subject to detailed design coordination in the event of a grant of permission. The taking in charge of the lands identified in the drawing above will help to facilitate this and ensure that the public right of way is secured.

Recommendation

The NTA recommends that, in the event of a grant of permission, a condition is attached stating that the applicant is required to continue to liaise with the NTA with regard to the design of the public realm and access arrangements on Belgard Square East and detailed design considerations at the interface between the development and the CBC in order to support the implementation of the CBC.

Walking and Cycling

An area of public open space is proposed along the southern boundary of the subject site that includes provision of a pedestrian and cyclist route on an east-west axis between Belgard Road and Belgard Square East that will be accessible to the public at all times. The NTA welcomes the provision of this route in providing enhanced pedestrian and cyclist permeability at this location in accordance with the Tallaght LAP which identified the need for a tertiary link. It is unclear from the drawings what width this proposed path will be. Given that it is intended to support two-way movements of both pedestrians and cyclists it is considered that a width of 4m should be provided.

The NTA supports the proposal to include the significant quantum (670 spaces) of cycle parking that is proposed which is in accordance with levels set out in the National Cycle Manual and the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (DHPLG). This will facilitate and encourage travel by bicycle to/from the development.

All cycling infrastructure should be provided in compliance with the NTA's 'National Cycle Manual'. Whilst the cycle parking is generally well located, in close proximity to building entrances, routes for cyclists within the car park have not been indicated. This would go towards greatly reducing conflict between cyclist and vehicular traffic. In addition to this, the external cycle parking should be sheltered rather than open to the elements in order to encourage use.

Recommendations

- It is recommended that the width of the shared track/path through the public open space corridor along the southern boundary of the development should be of 4m to allow for two-way movement.
- All cycling infrastructure should be provided in compliance with the NTA's 'National Cycle Manual' including the provision of sheltered cycle parking and the provision of identifiable routes through the car parking for cyclist.

I trust that the views of the Authority will be taken into account when considering this application.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning