

South Dublin County Council
Land Use, Planning & Transportation Dept
County Hall
Tallaght
Dublin 24
D24 A3XC

26th April 2023

T-PR

PROJECT NO. B981

RE: RESPONSE TO CIVIL ENGINEERING ITEMS RAISED IN THE REQUEST FOR CLARIFICATION OF FURTHER INFORMATION IN RELATION TO PROPOSED TRANSITIONAL CARE FACILITY, COOKSTOWN INDUSTRIAL ESTATE (PLANNING REFERENCE: SD22A/0361)

Dear Sir/Madam,

OCSC are preparing this response in relation to the Request for Clarification of Further Information (CFI) issued by South Dublin County Council (SDCC) regarding the proposed Transitional Care Facility at Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24 (Planning Reference: SD22A/0361).

This response specifically addresses the civil engineering items raised in the CFI with other items raised addresses under separate cover by other members of the design team.

CFI Item 2A

The LAP has a clear objective in relation to phasing and sequencing of development to ensure that isolated piecemeal pockets of land are not developed without connectivity and linkages. The applicant has proposed temporary pedestrian and cyclist upgrades from the site to Belgard Luas. The Planning Authority is very clear that temporary/interim works are not acceptable to the Council. A design team is being appointed by South Dublin County Council to provide a masterplan for Cookstown, focused on the public realm and to include pedestrian, cyclist and urban design upgrades. The applicant is requested to engage directly with the team appointed and ensure that a scheme of permanent works is agreed and provided, in tandem with the Cookstown masterplan, ensuring full integration of the proposed scheme and public realm works. The applicant may wish to apply for an extension of time in responding to this clarification of additional information request to enable this engagement. The applicant should also note that set down and loading areas outside the current site boundary along Cookstown Road and First Avenue on lands within the public realm and indicated for taking in charge by SDCC, will not be accepted irrespective of the ownership of same. In preparing a proposal for permanent works to be delivered, the applicant should incorporate all relevant items of concern raised in the Stage 1 & 2 Road Safety Audit and ensure public lighting is provided to the satisfaction of the Public Lighting Section. In preparing this response, the applicant should engage with all relevant sections of the Local Authority, and other relevant bodies, to ensure the proposed works will be acceptable prior to submission.

Civil / Structural / Environmental / Mechanical / Electrical / Sustainability

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Response

Active Travel - The proposed interim public realm upgrades to provide improved connectivity to the Town Centre and the nearby Luas Station have been carefully considered in the context of balancing the need to ensure that appropriate site accessibility is provided, that third party lands and future developments are not compromised in any way and that there is no negative impact to the delivery of future active travel measures in the local area as set out in the Tallaght Local Area Plan (LAP) and as will be set out in the Masterplan being developed by South Dublin County Council (SDCC).

The interim design proposed will offer notable improvements to both pedestrian and cycle accessibility at the site which are necessary to facilitate its development. The measures build on the existing infrastructure in the area to offer key localised improvements which achieve the stated accessibility objectives. These are realistic and deliverable in the context of the development proposed, while also avoiding abortive works insofar as is possible. The design has been subject to an independent Road Safety Audit carried out by a qualified professional and amended accordingly to ensure all issues highlighted, which were minor in nature, have been addressed in full.

In particular, it is emphasised that the proposed interim infrastructure measures in no way prohibit or prevent the delivery of any such an active travel masterplan in the future. The proposals work within existing kerb lines and property access requirements along the links in question, involving primarily resurfacing existing hard and soft landscaping space which can easily be replaced as part of the SDCC active travel projects in the future. On this basis, there is no clear reason as to why the proposed interim strategy would not be acceptable pending the delivery of the masterplan active travel scheme.

It is further noted that the development itself does not in any way compromise the delivery of future active travel infrastructure. While the layout proposed includes dedicated pedestrian and cycle infrastructure along the site boundaries which would suitably form part of any long term active travel measures, the taking in charge proposals submitted would also give a cross sectional width of approximately 18m from the development boundary to the existing boundary on the opposite side of Cookstown Estate Road which would be in the complete control of SDCC. Such a width is more than sufficient to cater for any high quality active travel scheme proposed by SDCC in the future. On that basis the proposed development again in no way prevents or negatively impacts the provision of any future active travel scheme in the area.

Notwithstanding the above, it is also noted that the earliest date for completion of the proposed development is expected to be 2026 at the earliest, and potentially later given current construction constraints, meaning the timelines for the delivery of the development and the active travel scheme are likely to align. On that basis, the Applicant is committed to working with SDCC with respect to the appropriate detailed design and delivery of any active travel measures proposed to avoid abortive works and align the respective proposals accordingly. It is considered that such an approach can be facilitated through appropriate condition.

It is also highlighted that the proposed measures will link well with more progressed active travel schemes locally including:

- The recently construction Belgard Square North Link Road which ties into the proposed measures directly linking to the town centre;
- The Tallaght Public Realm and Plaza which is at construction stage which will link with the Belgard Square North Link Road and further enhance accessibility;
- The Airtion Road Extension which received Part 8 approval in 2022 and is at detailed design stage, with an estimated 2 year delivery programme which will also link with the proposed interim measures and improve accessibility to the wider area via Belgard Road.

The aforementioned are highlighted further in the below mapping showing the active travel routes which have been recently completed or are to be delivered in the next 2 years (shown in red) along with the existing cycle routes in the area.

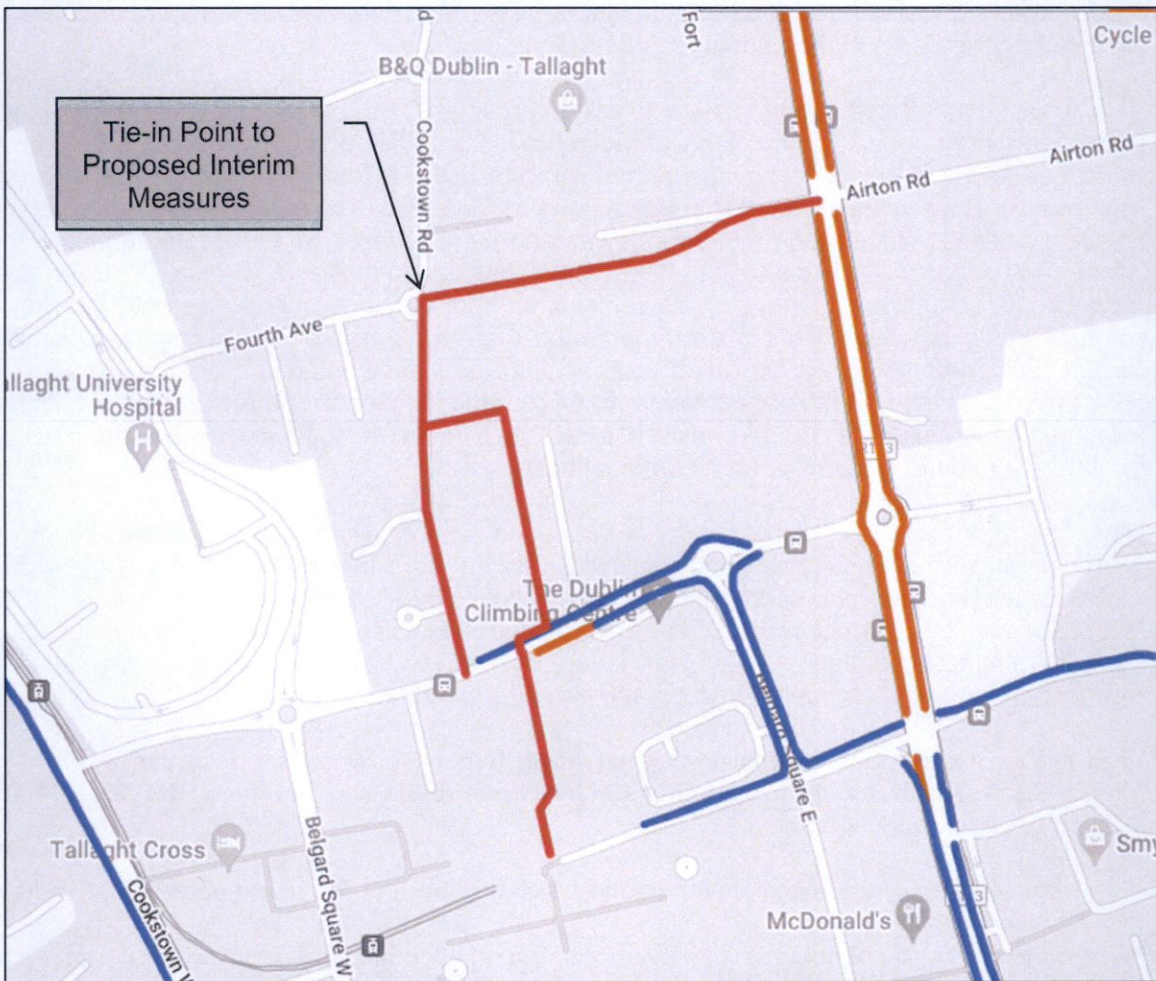


Figure 1: Local Active Travel Schemes for Short Term Delivery/Recently Completed

While the potential to request an extension to the timeframe for this response is noted, OCSC have further consulted with the SDCC Active Travel section on the timelines for their project but at the time of writing of this response, no programme was available. Considering the early

stage of the project combined with the extensive information gathering and stakeholder consultation that will be required, it is expected that a preliminary design would not be available with an appropriate timeframe, even allowing for an extension to the response period for this CFI. Furthermore, the additional delay that would be caused by an extension would have a direct negative impact on the provision of transition care beds. Such a facility would positively contribute to the achievement of our National Healthcare Policy, Sláintecare, and will aid with the potential to free up acute hospital beds sooner.

Boundary Set Down Bays - With respect to the set down areas proposed, the commercial elements proposed as part of the development are a requirement of the Development Plan and LAP requirements and will invariably have an associated demand for set down given their nature. The provision of set down parking on Cookstown Road has been minimised considerably to cater for a small number of vehicles but is felt to be wholly appropriate in ensuring the aforementioned demand is met.

It is stressed that these commercial units will be provided for the benefit and use of the wider Cookstown area and so will invariably attract patrons from pass-by trips who require only short term set-down. In the absence of a convenient set down located in close proximity to the commercial unit entrances, it is expected that the associated set down demand by patrons will result in vehicles stopping on the carriageway and thereby result in a negative impact to the local road network. This is particularly likely when considering the tertiary nature of this section of the road, as defined by the LAP, as vehicles will feel they are creating less of a blockage on less trafficked roads. This is a phenomenon that can be observed at numerous similar urban developments across Dublin and other cities which have opted to avoid the provision of short term set down parking at convenient and realistic locations. The reliance on traditional control measures such as double yellow lines are likely to prove ineffective as they are passive in nature and difficult to police on a continual basis.

The bay proposed on First Avenue is proposed specifically to cater for the servicing requirement of the transitional care facility. Given the sensitive nature of the use and the patients being treated, the segregation of servicing activity is considered to be essential. The proposed bay is optimally located and sized to facilitate this segregation and mitigate any potential impact to patients. Again, the extent of the bay proposed has been significantly reduced from the initial proposals to the minimum required.

It is further noted that the provision of set down parking is wholly in accordance with the standards set out within the Design Manual for Urban roads and Streets, with Section 4.4.9 stating on-street parking can:

- Calm traffic by increasing driver caution, visually narrow the carriageway and reduce forward visibility.
- Add to the vitality of communities by supporting retail/commercial activities that front on to streets through the generation of pedestrian activity as people come and go from their vehicles.
- Contribute to pedestrian/cyclist comfort by providing a buffer between the vehicular carriageway and foot/cycle path.
- Reduce the need or temptation for drivers to kerb mount and block foot/cycle paths.

- Provide good levels of passive security as spaces are overlooked by building.

As demonstrated in the proposed design, there is sufficient space available to provide the proposed bays while also providing high quality pedestrian and cycle infrastructure as appropriate along the boundary roads.

Notwithstanding the above, it is stressed that short term set down and servicing bays are provided for within the development site along the internal road meaning **the development is not reliant** on the proposed boundary bays and they are proposed primarily for the benefit of the public road network. Thus, they are considered appropriate to protect the integrity of the public road network while also facilitating the delivery and operation of development uses in line with the Development Plan and LAP requirements. It is noted that this is considered to be grounds for refusal if not appropriately addressed, however, if the rationale provided is not to the satisfaction of SDCC, the removal of the proposed bays can be addressed easily through appropriate condition.

Road Safety Audit - With respect to the Road Safety Audit, it is unclear based on a review of the available information including the Record of Executive Business and Chief Executive's Order, what specific issues are felt to not have been addressed. OCSC are of the view that the issues raised in the Road Safety Audit have been addressed to the satisfaction of the auditor in line with the completed Feedback Form included in the report. The issues highlighted in the Road Safety Audit are minor in nature and are reflected in the previously submitted drawings as appropriate, with further detail to be developed as part of the detailed design of the project should a grant of permission be received.

CFI Item 2B

The Planning Authority is not satisfied with the lack of permeability facilitated at the southern portion of the site, adjacent to the pocket park. 2 no. car parking spaces shall be omitted and additional plans shall be submitted clearly showing full permeability around the entire pocket park, including the opportunity for connections at the south east corner of the pocket park into the southern adjoining lands. A more detailed masterplan for the pocket park shall be provided, clearly demonstrating connectivity and consideration of desire lines and ensuring that the first phase of the pocket park delivers an attractive, useable space, with the inclusion of biodiversity planting.

Response

The response to this item is addressed primarily by the submission prepared by Ait, the project Landscape Architect, submitted under separate cover. The layout has been amended to include increased pedestrian/cycle permeability along the eastern boundary of the public park for cyclists and pedestrians via a 3m shared surface, similar to that already proposed along the northern boundary of the park.

As a local asset, prioritisation of pedestrian and cycle accessibility to and movement around the park is considered paramount. Thus, the promotion of cars around the park would be seen as a negative for same and the objective to encourage sustainable and active modes of travel. The provision of excessive road infrastructure for cars surrounding the park would also detract from its attractiveness as a usable open space and the overall quality of the environment.



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The LAP sets out a clear vision for the overall area which includes a high quality and permeable road network through the area, outside of the links directly bordering the park. This road network is more than sufficient to cater for the vehicular access needs to the zones lands and achieve the level of permeability desired by DMURS without the need to provide vehicle orientated roads directly surrounding the park itself. Minimising the movement of vehicles around the park specifically is considered to be more in line with the principles set out in DMURS which seek to ensure adequate vehicle permeability but prioritise the movement of and quality of infrastructure for pedestrians and cyclists.

It should also be noted that the proposed shared surfaces will also facilitate access for any and all maintenance requirements which would be relatively minimal for the park given its scale and nature.

Thus, taking the above into consideration along with the submission and design amendments prepared by Ait, the provision of the additional shared surface on the eastern side of the park is considered to meet the request from SDCC for permeability while also complying with the guidance set out in DMURS.

CFI Item 3

The applicant has not fully addressed all of the items previously requested. The applicant is requested to provide more detailed estimated figures and movements in relation to the following:

- A. The profile of patients.*
- B. Likely visitor numbers, based on known figures from similar facilities.*
- C. The specific service requirements of the dementia care facility, including number of dedicated staff, estimated visitor numbers and the requirements of patients for access to amenities outside the immediate development.*
- D. Clear estimated figures for the number of patients utilising the mobile diagnostic facilities, the type of diagnostic facilities that will be provided (in-premises or parked outside) and hours of operation.*

Response

The response to this item is addressed primarily by the submission prepared by Brock McClure, the project Planner, submitted under separate cover.

However, it is noted that the Record of Executive Business and Chief Executive's Order that there are concerns relating to the access of visitors to the proposed facility in terms of car parking and safe movement.

As noted within the submitted documentation, the site is highly accessible by a variety of sustainable means and the development proposes a suite of interim measures to facilitate active travel models, while SDCC are currently developing proposals for further permanent upgrades. On that basis, of the estimated 262 no. visitors, the majority are expected to travel by sustainable means. Notwithstanding this, a number of other factors must be considered:

- Visiting such facilities is effectively a social activity which often sees visitors group together to attend the site at a single time meaning the potential for car sharing and multiple vehicle occupants is very high;
- The duration and nature of stay will vary significantly meaning some patients will be very short term in nature and not attract significant numbers of visitors while longer term patients are more likely to generate the average 2 visitors noted in the submission;
- Visiting will not be concentrated into a single period and instead spread out over the course of a day. Even allowing for a worst case scenario where all visitors attend at the weekend, which will not occur in reality, this equates to 131 visitors per day. Spreading this out over an approximate 8 hour period, it equates to an average of 16 visitors per hour. Further considering the accessibility of the site which will reduce the numbers seeking to travel by car combined with the aforementioned expectation of higher than normal occupancy rates, the actual demand for car parking is expected to be less than 10 vehicles in a given hour;
- As noted in the previous Further Information submission, a flexible arrangement is proposed to maximise the efficient use of parking spaces and allow some dual usage of visitor spaces during overnight periods where staff requirements will be increased due to the anti-social nature of the shift times but when there is no demand from visitors.

Ultimately, the difference in transportation terms between the proposed TCF relative to a traditional nursing home are considered negligible. In particular, the TCF will operate in an almost identical manner to a typical nursing home with respect to visitors. Thus, there is no reasonable basis that a quantum of parking that is acceptable for a nursing home use would not be acceptable for the transitional care facility use proposed. On that basis, the parking requirements associated with the TCF are deemed comparable to that of a nursing home and the relevant standards from Table 12.25 of the Development Plan are applicable. This is in line with the following statement from Section 12.7.4 of the Development Plan:

“For any commercial use not specified within Table 12.25 the default parking rate will be calculated based on those of a comparable use and / or determined as part of a Transport and Traffic Assessment.”

Furthermore, avoidance of excessive car parking provision is a recognised demand management technique within the recently updated Climate Action Plan which states:

- *“The availability and price of car parking also plays a major role in people’s choice to use a car, and impacts not only on climate emissions, but also on traffic congestion and the efficient operation of urban areas. The quantum, pricing and form of parking needs to be managed carefully so as to favour sustainable modes over car usage.”*
- *“Planning authorities should not require specific minimum levels of car parking with the exception of disabled parking. At locations with good public transport, maximum levels for car parking provision should be applied”.*

The National Planning Framework recommends:

- *There should generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five.*

Thus, the car parking proposals are in line with the Development Plan standards which are a **maximum** for locations such as this meaning a breach above same would not be considered appropriate as per the Development Plan statement that "*the number of spaces provided for any particular development should not exceed the maximum provision*".

CFI Item 4

The applicant has not achieved the required Green Space Factor (GSF) at the site of 0.5. The applicant shall engage directly with the Public Realm Section and provide a revised GSF calculation detailing how they have achieved the appropriate the minimum GSF scoring established by their land use zoning. Developers can improve their GSF score by retaining existing landscape features and incorporating new landscape features and GI interventions. Layering GI interventions increases the score. Completed GSF worksheets should be submitted to SDCC with the Green Infrastructure Plan and Landscape Plan for a proposed development. Additional/amendments SuDs measures may be included in response to this item.

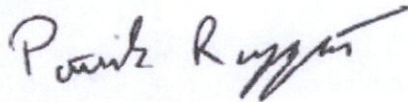
Response

The response to this item is addressed primarily by the submission prepared by Ait, the project Landscape Architect, submitted under separate cover. Additional SuDS measures have been incorporated into the design which can be seen in the updated OCSC Drawing No. B981-OCSC-XX-XX-DR-C-0505. Additional measures provided include:

- The inclusion of multiple rain gardens within the internal courtyard of the transitional care facility;
- The inclusion of a rain garden along the eastern wall of the building;
- The addition of multiple swales comprising of wetland planting bounding the access road running north to south through the site where feasible.

We trust the above addresses all of the items raised in full, however, should you have any queries regarding the content of this letter, please do not hesitate to contact the undersigned.

Yours sincerely,



Patrick Raggett
Chartered Civil Engineer
For O'Connor Sutton Cronin