

**Residential Development, Fortfield
Road, Terenure**

An Bord Pleanála Appeal

March 2025

Document Control

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1.0 Introduction

This report was prepared in response to the Dublin City Council (DCC) decision to refuse permission for Planning Application WEBLRD6058/24-S3 relating to the proposed Large-scale Residential Development (LRD) at Fortfield Road, Terenure, Dublin 6W.

This report relates to the single reason for refusal of permission as follows:

- 1. The applicant has failed to demonstrate that the range of travel needs of the future resident population can be met by the proposed development. Having regard to the site's accessibility in accordance with Table 3.8 of the Compact Settlement Guidelines, the suburban and residential location of the site, the layout and nature of roads adjacent to the site, and to the frequency of bus services and quality of bus infrastructure (both existing and planned) serving the site, the proposed car parking provision is considered inadequate to serve the needs of future residents of the development. It is therefore considered that the proposed development would give rise to unacceptable levels of overspill and haphazard parking on adjacent roads and bus corridors, would seriously injure the amenities of the area and would endanger public safety by reason of traffic hazard and obstruction of pedestrians, bus services and other road users. The proposed development would therefore be contrary to Policy SMT27 and Appendix 5, Section 4.0 of the Dublin City Development Plan 2022-2028, Section 5.3.4 of the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024) and Section 4.23 the Sustainable Urban Housing: Design Standards for New Apartments (2023). The proposed development would be contrary to the proper planning and sustainable development of the area.*

This report outlines responses to the DCC Transportation Planning Division Report (dated 13th February 2025) as this is the source of the recommendation for refusal. For ease of reference, the DCC Transportation Planning Division Report has been included as Appendix A to this report.

2.0 Refusal Item 1 - Applicant's Response

The Applicant's Response has been structured to address the various items raised by the Transport Planning Division (TPD) in their report. These identified items are the lead cause for the TPD's recommendation for refusal and the resulting reason for refusal:

1. Locational Designation of Site
2. Car Parking
3. Site Context

2.1 Locational Designation of Site

The reason for refusal provided by DCC TPD is based substantially on their assertion that the proposed designation of the site as an '**Accessible Location**' under the definitions of the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024) is not valid.

As acknowledged by DCC TPD, they note that a justification for the proposed car parking ratio is provided in the submitted Traffic & Transport Assessment (TTA) included in the planning submission. Having regard to the criteria of Table 3.8 of the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (2024), the applicant outlined that the subject site constitutes an "Accessible Location", as it is located:

- Within 500m walking distance of an existing or planned BusConnects Core Bus Corridor (CBC) stop.
- Within 500m (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10-minute peak hour frequency) urban bus services.

The TPD state that:

"... the proposed designation of the site as an 'Accessible' location is incorrect and not accepted by this division."

"...that the site would be designated an 'Intermediate' location under the Compact Settlement Guidelines, for which the maximum car parking rate would be 2no. spaces per dwelling in accordance with SPPR 3 (iii) of the Guidelines. The applicant has therefore failed to address item (g) of this division's Opinion Report."

We present the following clear and unambiguous justification of the site qualifying as an 'Accessible' location under the definitions and requirements of the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024) as follows:

High-Capacity Public Transport Node or Interchange:

In accordance with the definitions outlined in the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (specifically Table 3.8 - see extract below), the Fortfield LRD is located within an '**Accessible Location**' given its proximity to a 'High-Capacity Public Transport Node or Interchange'.

"High-Capacity Public Transport Node or Interchange

Lands within 1,000 metres (1km) walking distance of an existing or planned high-capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' stop..."

The distance from the development's entrance on Fortfield to the planned BusConnects 'Core Bus Corridor' stop on Templeogue Road is within 500m as illustrated by the travel distance measured along the Fortfield Road eastern footpath and pedestrian crossing point at the junction with Templeogue Road. Table 3.8 of the 2024 Compact Settlement Guidelines states *"...locations within 500 metres*

walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop”. It does not state the development must be encompassed within 500 metres - only that the location is within 500m walking distance.

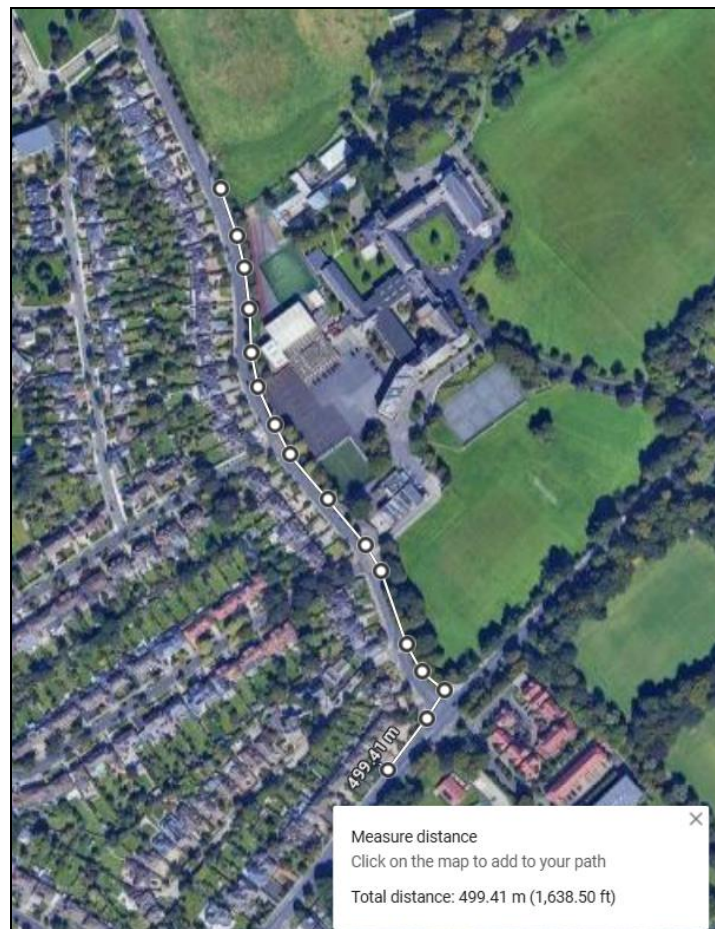


Figure 2-1: Travel Distance from Proposed Development Entrance to permitted Templeogue/Rathfarnham to City Centre CBC Bus Stop

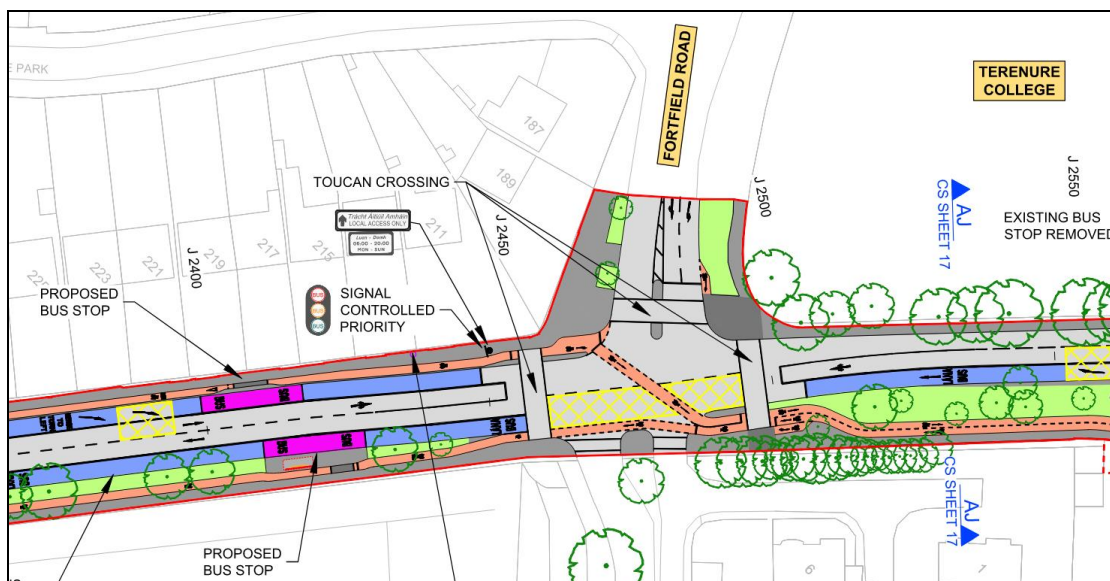


Figure 2-2: Templeogue/Rathfarnham to City Centre CBC General Arrangement - Sheet Number 34 of 42 (Rev M01)

Accessible Location:

Irrespective of the Templeogue/Rathfarnham to City Centre CBC, the development site is still correctly designated as an ‘**Accessible Location**’ due the definition in Table 3.8:

“Accessible Location

Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.”

As stated in the ‘Residential Travel Plan’ Section 2.4.5.2 (included in the original planning submission), Route No. 54A satisfies this planned high frequency urban bus service under the NTA’s 2025 upgrade to the 54A service - please see extract below.

On Fortfield Road (stops 2397, 2410, 2409 and 2398)

a) Route No. 54A: From Pearse St. to Ellensborough / Kiltipper Way

It is understood from correspondence with DCC Transportation Planning that it is the intention of the NTA to upgrade the 54A service, which is currently running at a 30 minutes off-peak frequency to the F1 service which will run every 15 minutes off-peak and every 10 minutes at peak hours next year under BusConnects.

Satisfying this ‘Accessible Location’ definition is dependent on two factors (1) Proximity of relevant Bus Stops and (2) Peak Hour Frequency of Existing or Planned Urban Bus Service.

1. Proximity of Relevant Bus Stops:

Please see below detail of the existing and proposed Bus Stops on Fortfield Road on the Route No. 54A service. The entirety of the proposed residential units are contained within 500m of these Bus Stops.



Figure 2-3: Location of Bus Stops on Fortfield Road (Planned High Frequency 54A Urban Bus Service)

2. Peak Hour Frequency of Existing or Planned Urban Bus Service:

Please see below details of the Route and Frequency of the planned 54A bus service under the phased implementation of the Bus Connects Dublin Network Redesign.

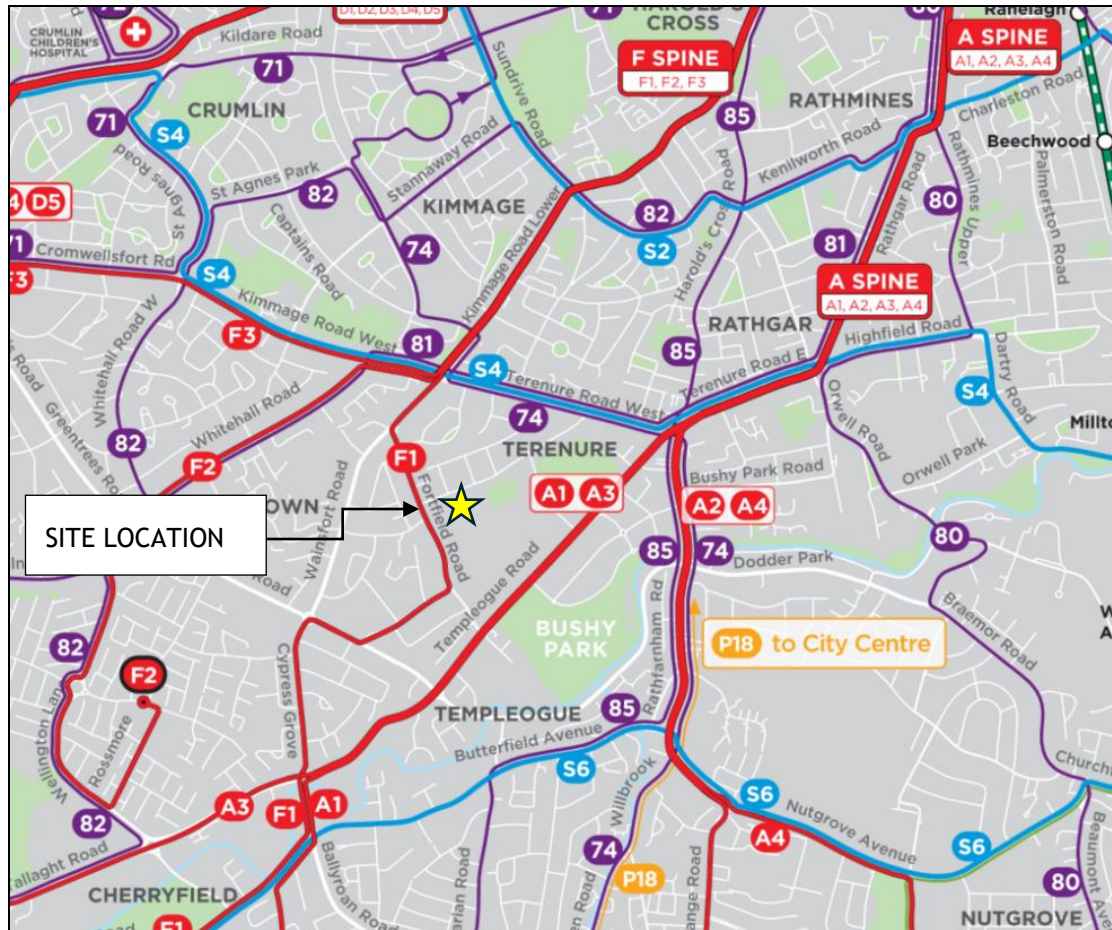


Figure 2-4: Revised Network Map Extract (Source: [Dublin Network Redesign | Busconnects](#)). For further details, refer to [Dublin Bus 54A bus - Dublin](#)

Spine frequency tables

The number in each box is the expected time in minutes between buses. It is subject to adjustment in line with future passenger numbers.

Spines & Branches		Weekday																			Saturday											Sunday																						
Route no.	To and From	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11
F-SPINE	Finglas - City Centre - Kimmage	10	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	10	7	7	7	5	5	5	5	5	5	5	5	5	5	7	7	7	7	10	10	10	7	7	7	7	7	7	7	10	10	10	10			
F1	Charlestown - Finglas Bypass - City Centre - Tallaght	30	15	10	10	15	15	15	15	15	15	10	10	10	15	15	15	15	15	30	20	20	20	15	15	15	15	15	15	15	15	15	20	20	20	20	30	30	30	20	20	20	20	20	20	20	30	30	30	30				
F2	Charlestown - Finglas NW - City Centre - Templeogue	30	15	10	10	15	15	15	15	15	15	10	10	10	15	15	15	15	15	30	20	20	20	15	15	15	15	15	15	15	15	15	20	20	20	20	30	30	30	20	20	20	20	20	20	20	30	30	30	30				
F3	Charlestown - Finglas SW - City Centre - Greenhills	30	15	10	10	15	15	15	15	15	15	10	10	10	15	15	15	15	15	30	20	20	20	15	15	15	15	15	15	15	15	15	20	20	20	20	30	30	30	20	20	20	20	20	20	20	30	30	30	30				

Figure 2-5: Frequency Table (Source: [Dublin Network Redesign](#) | [Busconnects](#))

Conclusion:

Based on the above, we believe there is very clear and unambiguous justification of the site qualifying as an '**Accessible**' location under the definitions and requirements of the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024).

2.2 Car Parking

The TPD state that:

“The proposal results in a car parking ratio of 0.42 per unit for the 265no. residential apartments excluding car-share, visitor and accessible parking allocation (as per SPPR 3 of the Compact Settlement Guidelines, 2024). When including the houses, the resulting ratio is 0.46 per unit for the 284no. total residential units.

Given the site’s accessibility in accordance with Table 3.8 of the Compact Settlement Guidelines as set out above, and having regard the suburban location of the site, the layout and nature of roads adjacent to the site, and to the frequency of bus services and quality of bus infrastructure (both existing and planned) serving the site, the proposed car parking provision is of serious concern to this division and considered inadequate to serve the needs of future residents of the development.”

Again, DCC TPD’s contention that the car parking provision is inadequate is based on their incorrect characterisation of the site’s accessibility under the Compact Settlement Guidelines as an ‘Intermediate’ location.

As outlined in Section 2.1 above, the site is an ‘Accessible Location’ and is clearly well served in relation to the ‘BusConnects Templeogue/Rathfarnham to City Centre’, BusConnects F1 route and associated planned 54A bus service.

The TPD state that:

“Future residents would generally appear to be within 10 minutes walking distance of high frequency bus services, however there are no other high frequency public transport options within convenient walking distance.”

This is clearly an incorrect statement given the F1 Spine Route and the associated 54A high-frequency urban bus service.

As a result of the correct ‘Accessible Location’ designation, the default position per specific planning policy requirements (SPPR) 3 of the Guidelines is that car-parking provision should be **substantially reduced**. Per the extract taken from SPPR 3 below:

“(ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.”

The TPD state that:

“It has not been demonstrated to the satisfaction of this division that the proposed significant relaxation of the maximum standards for Parking Zone 2 is justified in accordance with the criteria set out in Section 4.0 of Appendix 5 of the City Development Plan.”

The operative words here are **“maximum standards”**. In accordance with Map J of the DCC Development Plan, the development lands are located within Area 2 and therefore the **maximum permissible** car spaces are 1 per dwelling per DCC Development Plan 2022-2028, Appendix 5, Table 2. This is not a target car parking provision.

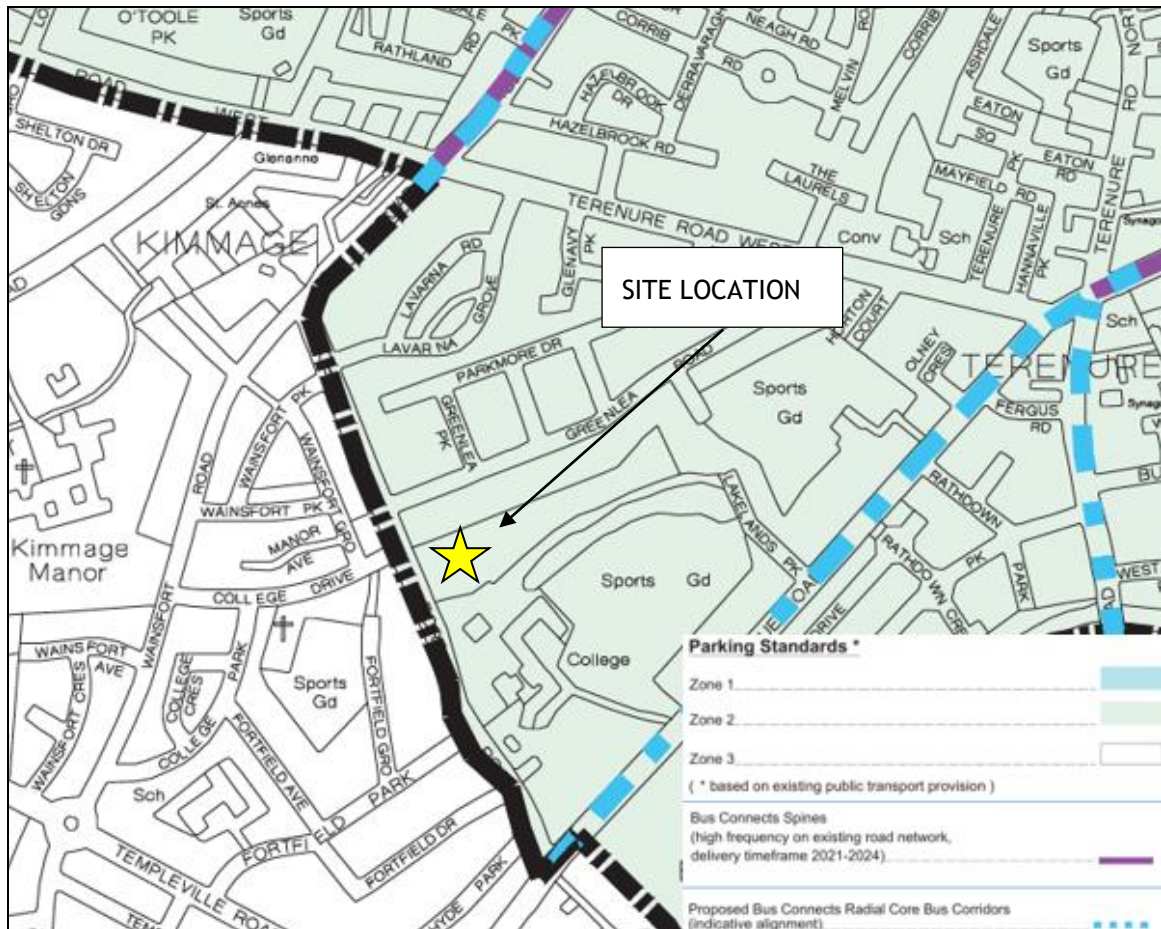


Figure 2-6: DCC Development Plan Map J indicating parking zones

As a result of the 'Accessible Location' designation, the default position per specific planning policy requirements (SPPR) 3 of the Guidelines is that car-parking provision should be substantially reduced.

Furthermore, the TPD also state that:

"It is acknowledged the applicant has demonstrated that a reduction below this maximum standard can be accommodated."

In accordance with the DCC Development Plan 2022-2028, Appendix 5, Section 4.0 'Car Parking Standards', a reduction from maximum parking standards (1 per dwelling) has been proposed with ample justification presented in the form of the Traffic and Transport Assessment, Residential Travel Plan and Public Transport Capacity Assessment content included in the original planning submission.

As stated in the DCC Development Plan 2022-2028, Appendix 5, Section 4.0, a relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location. The Applicant has set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria:

- A. **'Locational suitability and advantages of the site'** - Please refer to Residential Travel Plan supplied as part of the LRD Planning Application and Appeal.
- B. **'Proximity to High Frequency Public Transport services (10 minutes' walk)'** - Please refer to Residential Travel Plan, Public Transport Capacity Assessment and Traffic and Transport Assessment supplied as part of the LRD Planning Application and Appeal. Notably the site's proximity to BusConnect's F1 Spine Route and the Templeogue/Rathfarnham to City Centre Core Bus Corridor.

- C. ***‘Walking and cycling accessibility/permeability and any improvement to same’*** - Please refer to Residential Travel Plan supplied as part of the LRD Planning Application and Appeal. Notably the Census 2022 data supporting sustainable transport modal shift in the area and provision of substantial bicycle facilities (including non-standard cycle facilities and e-bike charging facilities).
- D. ***‘The range of services and sources of employment available within walking distance of the development’*** - - Please refer to Residential Travel Plan supplied as part of the LRD Planning Application and Appeal.
- E. ***‘Availability of shared mobility’*** - - Please refer to Residential Travel Plan supplied as part of the LRD Planning Application and Appeal. Notably the Census 2022 data supporting sustainable transport modal shift in the area, provision of car sharing facilities (see GoCar Letter of Support), provision of substantial bicycle facilities and promotion of public transport use available within close proximity of the development site.
- F. ***‘Impact on the amenities of surrounding properties or areas including overspill parking’*** - The proposed car and cycle parking appropriate for the development has been outlined and justified in the Residential Travel Plan and Traffic and Transport Assessment supplied as part of the LRD Planning Application and Appeal. This appropriate parking quantum has been proposed in accordance with the appropriate National Policy, including but not limited to the ‘Sustainable and Compact Settlements Guidelines for Planning Authorities’, the ‘Sustainable Urban Housing: Design Standard for New Apartments’ and Climate Action Plan.

We further note the previous An Bord Pleanála Inspector’s Report regarding the issue of overspill parking as follows:

“The submissions on the application and the appeal and the planning authority’s decision also referred to ‘overspill’ car parking that might arise on the surrounding streets from the proposed development. On this issue I would advise the board that the public resource of on-street parking will always require management and control which could not be avoided even if new housing is not introduced to an area. It would not be in keeping with the national and local policies to promote a more compact urban form to attempt to address this issue by providing parking to meet all the potential demand for it.”

- *ABP Inspectors Report, Section 9.7.3*

- G. ***‘Impact on traffic safety including obstruction of other road users’*** - Please refer to Quality Audit (incl. Stage 1 Road Safety Audit) supplied as part of the LRD Planning Application (LRD Stages 2 and 3).
- H. ***‘Robustness of Mobility Management Plan to support the development’*** - Please refer to Residential Travel Plan supplied as part of the LRD Planning Application and Appeal.

As outlined in the Residential Travel Plan, the general objectives are as follows:

1. Reduce and discourage the reliance on the use of private car travel.
2. Increase and facilitate the use of alternative sustainable forms of transport such as walking, cycling, or traveling by public transport to/from the development.
3. Develop an integrated and unified approach to traffic management for the site which will include public transport, private vehicles, cycle facilities and car sharing services.
4. Engage with Dublin City Council (DCC), the National Transport Authority (NTA), Irish Rail, Dublin Bus, Transport Infrastructure Ireland, Transdev, Bus Éireann and all other relevant stakeholders in a partnership model to promote an increased uptake in public transport.

It is an objective of this plan to limit the level of parking available on-site wherever possible in order to minimise and discourage dependency on private car travel. This will also continue to take into consideration the necessary demand to prevent overspill parking issues in nearby locations.

The provisions that the applicant proposes to put in place as a means of reducing car dependency associated with this proposed development in the interest of compliance with the following sustainable transport initiatives:

- National Planning Framework (2018)
- Housing for All (2021)
- Housing for All Action Plan Update (2022)
- National Sustainable Mobility Policy (2022)
- Climate Action Plan (2023)
- Sustainable and Compact Settlements Guidelines for Planning Authorities
- Sustainable Urban Housing: Design Standard for New Apartments

It is the obligation of the Board and the planning authority to comply with Section 15 of the Climate Action and Low Carbon Development Act 2015, and in particular to exercise its functions as far as practicable with the approved Climate Action Plan.

The proposed car parking provisions included in the WEBLRD6058/24-S3 consist of:

- Total Housing Unit Car Parking Spaces = 19 no. spaces for 19 no. houses (complying with DCC's requirements)
- Total Residential Apartment Car Parking spaces = 138 no. spaces for 265 no. apartments (0.52 Ratio).
 - 112 no. Standard Residential Parking Spaces
 - 9 no. Visitor Parking Spaces
 - 7 no. Disabled Parking Spaces
 - 10 no. Car Share Spaces

Total = 138 no. spaces

Total Residential Apartment Car Parking spaces (Excluding Visitor, Disabled and Car Share per SPPR 3) = 112 no. spaces (0.42 Car Parking Ratio).

Total Residential (Houses + Apartments) Car Parking Spaces (Excluding Visitor, Disabled and Car Share per SPPR 3) = 131 no. spaces (0.46 Car Parking Ratio).

We contend that the car parking proposals for the development are entirely appropriate given the 'Accessible Location' designation and comply with the requirements of the various sustainable transport initiatives, including the 'Sustainable and Compact Settlements Guidelines for Planning Authorities' and the 'Sustainable Urban Housing: Design Standard for New Apartments'.

Previous An Bord Pleanála Inspector's Report:

It is noted that the TPD reference the previous An Bord Pleanála Inspector's Report in their report under 'Locational Designation of Site' as follows:

"An Bord Pleanála in its assessment of the previously refused LRD application on site considered the site to be an "intermediate urban location" under the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2022). The Board Inspector's Report sets out that this is in part due to the "moderate" level of existing bus service provision serving the site and the lack of additional 2-way continuous bus lane provision along the CBC route planned as part of BusConnects. This division does not consider that the accessibility of the site, in the context of the Inspector's assessment, has significantly changed in the interim to reclassify the site as an 'accessible location'."

As outlined in Section 2.1 above, the development site is clearly an 'Accessible Location' as the BusConnects F1 Spine Route and 54A Bus Service has developed in the intervening period. Despite TPD's statement to the contrary, it is clear that the accessibility of the site has significantly changed in the interim to the extent that the site must be classified as an 'Accessible Location' under the requirements of the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024).

It is noted that the TPD fail to reference the previous An Bord Pleanála's Inspector's Report with regard to their determination on car parking provision. Please note that parking was used as a Reason for Refusal on the previous LRD application. When appealed to An Bord Pleanála, the ABP Inspector disagreed with DCC and concluded that our parking proposals were appropriate and that the issue of parking **did not represent a valid reason for refusal** - see highlighted extracts from ABP Inspector Report:

*"I would advise the board that national policies and the provisions of the development plan do not provide objectively verifiable standards against which to determine the appropriate level of car parking for a particular development on particular site. Objectives NPO 13, 27, 54 and 64 of the National Planning Framework support sustainable transport modes for environmental reasons which could reasonably be taken as implying that less car parking should be provided for new residential development in cities although they do not specifically state that. SPPR 8 of the 2020 apartment design guidelines says that there should be minimal car parking in BTR schemes on the basis that they are more suitable for central and accessible areas and have a central parking management regime. The BTR scheme proposed in this application does provide for such a management regime, but it is not in a central accessible area. SPPR 8 might therefore justify some reduction in car parking as proposed in this scheme, but not the omission of parking entirely for the proposed apartments as might be the case on a central/accessible site. The development plan provides maximum standards for car parking, rather than minimum ones. The proposed development would be well below the applicable maximum levels of parking. It also states a general policy at SMT1 to promote modal shift away from private car use. The report from the Transportation Section of the council referred to prevailing level of non-car owning households in this area of 11-18%. However national and development plan policies refer to a shift in modal use, therefore I do not consider it reasonable to seek facilitate a replication of existing car parking pattern established by the existing lower density housing in the area in proposed higher density residential schemes. The site would have levels of accessibility to services and employment centres that are typical of the city council area as a whole, where the 2016 census reported that 34% of households did not own a car and 64% of persons reached their place of work or education other than in a private vehicle, and the local electoral area where 29% of household did not own a car and 63% of persons reached their place of work or education other than in a private vehicle. **In this context the proposed provision of 0.34 car parking spaces for the proposed apartments strikes me as a reasonable balance between the policy imperative to promote modal shift and the need to provide car parking for households that cannot reasonably function without it.** However, this a judgment with which the board and others may reasonably disagree. The submissions on the application and the appeal and the planning authority's decision also referred to 'overspill' car parking that might arise on the surrounding streets from the proposed development. On this issue I would advise the board that the public resource of on-street parking will always require management*

and control which could not be avoided even if new housing is not introduced to an area. It would not be in keeping with the national and local policies to promote a more compact urban form to attempt to address this issue by providing parking to meet all the potential demand for it. It is therefore concluded that the parking provision in the proposed development would not justify refusing permission.”

- *ABP Inspectors Report, Section 9.7.3*

Please note that the proposed parking ratio has significantly increased (due to reduction in apartment units) for this latest LRD, as summarised below:

Previous LRD Apartment Car Parking Proposals (Ref: WEBLRD6004/22-S3):

Total Residential Apartment Car Parking spaces = 124 no. spaces for 364 no. apartments (0.34 Ratio)

- 86 no. Standard Residential Parking Spaces
- 13 no. Visitor Parking Spaces
- 6 no. Disabled Parking Spaces
- 19 no. Car Share Spaces
- Total = 124 no. spaces

Total Residential Apartment Car Parking spaces (Excluding Visitor, Disabled and Car Share in accordance with SPPR 3) = 86 no. spaces (**0.23 Ratio**).

Latest LRD Apartment Car Parking Proposals (Ref: WEBLRD6058/24-S3):

Total Residential Apartment Car Parking spaces = 138 no. spaces for 265 no. apartments (0.52 Ratio)

- 112 no. Standard Residential Parking Spaces
- 9 no. Visitor Parking Spaces
- 7 no. Disabled Parking Spaces
- 10 no. Car Share Spaces
- Total = 138 no. spaces

Total Residential Apartment Car Parking spaces (Excluding Visitor, Disabled and Car Share in accordance with SPPR 3) = 112 no. spaces (**0.42 Ratio**).

Therefore, the latest LRD proposals represent a significant increase from 0.23 car parking ratio to 0.42 car parking ratio for the residential apartment component (a substantial 82% increase).

It is acknowledged that the previous WEBLRD6004/22-S3 represented a Build to Rent (BTR) scheme. The substantial increase in residential apartment car parking ratio is justified and appropriate for the latest WEBLRD6058/24-S3, which is a Build to Sell (BTS) scheme.

LRD Engagement with DCC's Transportation Planning Division:

DCC's TPD representatives never stated a perceived dissatisfaction with the car parking proposals throughout the LRD engagement.

DCC's Appendix (B) 'Record of Section 32C LRD Meeting' outlines DCC's comments relating to Traffic and Transportation Issues as follows:

6. Item 6- Traffic and Transportation Issues

DCC Comments:

- Single access is welcomed.
- Fire tender access through B – D. Access on south-west side can be considered.
- The site crosses into South Dublin area – will there be a contemporary lodgement for that side of the development?
- At the 247 meeting, a staggered junction was raised? 4-arm junction acceptable in principle to Roads, subject to design.
- Would require a quality audited implementation.
- Internal pedestrian access routes - Some pinch points less than 1.8m. Make sure at least 1.8m is achieved.
- Footpath on Fortfield Road should be at least 1.8m, ideally 2m in width.
- Will there be access to the lakelands?
- Limit potential for overspill.
- Site not within 500m of high frequency public transport on report – precedence of inspector reports.
- Public Transport Capacity Analysis noted. Should also be noted that concerns raised in Inspector's report related also to existing and future capacity of the network.
- Cargo parking has been reduced to 4 – should be increased, noting that 8 spaces provided previously.
- Welcomes 610 places, but it could be reduced to allow for more variety/security.
- **Key concerns addressed in principle.**

It states, "Key concerns addressed in principle". There is no indication of an issue with the proposed car parking provision.

The resulting LRD Opinion simply stated the following under Item 8(g):

- | | |
|----|---|
| g) | A robust rationale should be provided for the proposed locational designation of the application site in accordance with Table 3.8 and SPPR 3 of the 'Sustainable Residential Development and Compact Settlements' guidelines (2024). |
|----|---|

The Opinion contained no content that specifically indicated a perceived shortfall in residential car parking proposals. There was certainly no indication of an issue that would trigger their statement that "the proposed car parking provision is of serious concern to this division and considered inadequate to serve the needs of future residents of the development" in their Planning Report.

One would reasonably expect that such a stance would be flagged in the Opinion and Opinion Meeting minutes.

Furthermore, PUNCH engaged directly with DCC Transportation Planning representatives on the LRD Stage 3 and associated Opinion Responses in advance of lodging the final planning submission -see attached email from a representative of DCC Transportation Planning Division of 26th August 2024. In relation to our proposed response relating to the parking quantum and justification sought under LRD Opinion Item 8(g), the DCC representative states:

"This division does not seek to raise any further issues in relation to the draft responses, based on the draft material reviewed."

From: [REDACTED]
Sent: Monday 26 August 2024 12:16
To: Paul Casey | PUNCH
Cc: [REDACTED]
Subject: RE: 222102: LRD6058/24-S2 Fortfield Road

Hi Paul,

Transportation Planning Division has reviewed the draft responses provided in the draft LRD Summary Response Report, in addition to the issued draft documentation, where referred to in the response report.

The following comments are made without prejudice.

It is noted that draft responses to Opinion items 8(a) and 8(b) are incomplete, pending further consultation with the NTA and others. No comments provided on this basis.

8(f) – The absence of a pedestrian connection to Lakelands Park remains a concern to this division. It is considered that this connection would enhance site connectivity generally and would improve convenient means of access from the development to the BusConnects CBC and to local amenities.

8(iv) – The submitted material does not appear to identify the e-bike charging spaces referenced in the Response Report. These should be clearly identified on the relevant drawings and reports.

This division does not seek to raise any further issues in relation to the draft responses, based on the draft material reviewed.

Kind regards,

[REDACTED]

Transportation Planning | Environment & Transportation Department | Block 1, Floor 5, Civic Offices

There is absolutely no reference to a perceived shortfall of residential car parking provision.

Our interpretation of this correspondence was that DCC's TPD were satisfied with the car parking proposals and associated justifications in response to Opinion Item 8(g) prior to planning lodgement based on their review of the draft documentation supplied.

Please note that there was no substantive change to the parking proposals from the draft material submitted to the Transportation Planning Division and the final parking proposals submitted with this application. Critically, the draft material contained our 'Accessible location' determination and a proposed Car Parking Ratio of 0.42 for the residential apartment car parking as per the requirements and definitions of SPRR3.

Despite this active engagement with DCC's TPD, the same individuals from DCC Transportation Planning Division included in this August 2024 engagement then prepared the Transportation Planning Division Report that recommends refusal.

Timeline of DCC TPD's opinion on development proposals:

- **May 2024:** "Key concerns addressed in principle" on Traffic and Transportation Issues. (Proposed Car Parking Ratio = 0.4)
- **August 2024:** Following a review of the supplied draft LRD Stage 3 and associated Opinion Responses in advance of lodging the final planning submission, DCC Transportation Planning Division "does not seek to raise any further issues in relation to the draft responses, based on the draft material reviewed." (Proposed Car Parking Ratio = 0.42)
- **February 2025:** DCC Transportation Planning Division recommends refusal. "The development as proposed has not adequately responded to issues and concerns raised by this division at opinion stage. As such, this division continues to have serious concerns regarding the development." (Proposed Car Parking Ratio = 0.42)

Based on our engagement with DCC throughout the LRD process, we do not understand what influenced the TPD's opinion on residential car parking proposals between the Stage 2 LRD Opinion on May 2024, the engagement in August 2024 and the resulting decision to refuse.

If DCC wished to impose a higher car parking ratio for the residential apartment component in excess of 0.5, then they could have easily advised accordingly at any stage throughout the LRD process. It is also noted that DCC's interpretation of what would constitute an acceptable car parking provision remains completely undisclosed in their Transportation Planning Division Report.

2.3 Site Context

Under the 'Site Context' section of the TPD report, it states:

"From an analysis of the site using the NTA's Public Transport Accessibility Level (PTAL) tool, the site is determine to have "very poor to poor" public transport accessibility. This indicates limited access to public transport, likely requiring more reliance on other transport modes."

This PTAL tool is further referenced in the 'Locational Designation of Site' section as follows:

"The site location's level of relative accessibility is further demonstrated by the PTAL result, referred to above in this report."

Per the NTA website description, the Public Transport Accessibility Level (PTAL) analysis combines the walk or cycle journey time to a Public Transport stop with the level of service at that stop. It gives an **"idea"** (emphasis added) of how well connected an area is to Public Transport services.

The tool includes the following disclaimers:

1. It is the NTA's intention to provide the best available tools and base data when producing PTAL, but the NTA will not be held responsible for inaccuracies that result from the uncertain or limited nature of the information provided.
2. PTAL is a tool developed to assist in the strategic planning process and should not be considered a Journey Planning Tool.
3. Some of the information presented and/or used in PTAL comes from third parties, such as HERE Mapping. The NTA is not responsible for any inaccuracies and/or mistakes in the information provided.
4. The NTA will not be liable to any user for any loss or damage arising under or in connection with (i) the use of, or inability to use PTAL; or (ii) use of, or reliance on any content displayed on PTAL. In relation to a business user, the NTA will not be liable for: (i) loss of profit, sales, business or revenue; (ii) business interruption; (iii) loss of anticipated savings; (iv) loss of business opportunity, goodwill or reputation; or (v) any indirect or consequential loss or damage.
5. The NTA will make reasonable efforts to update the information on the PTAL website, however the NTA make no guarantees, whether expressed or implied, that the content of PTAL is accurate, complete or up-to-date.
6. The NTA may at any time revise this disclaimer and/or introduce changes to PTAL without notifying you. It is therefore your responsibility to regularly review this website to ensure that you are aware of any changes.

It is noted that Data Downloads are currently unavailable from the NTA's PTAL website.

The NTA's PTAL tool also only provides data as it relates to the AM Peak and not the PM Peak.

It is fair to say that the PTAL is a blunt tool that gives an indication of public transport accessibility. However, it does not supersede the site-specificity of a development site as has been illustrated in the Traffic and Transport Assessment, Residential Travel Plan and Public Transport Capacity Assessment content included in the original planning submission

TPD's statement that the site is considered to have 'poor to very poor' public transport accessibility is incorrect and does not reflect the current designation. A 'Medium-High Level of Service' would be a more accurate description for the development.

- The site is located within a '**Medium Level of Service**' area and within easy/immediate walking distance to '**Medium-High Level of Service**' during the AM Peak (7-8am).
- The site is located within a '**Medium-High Level of Service**' during the AM Peak (8-9am).

See extract below from the NTA's Public Transport Accessibility Level (PTAL) tool for illustration of the public transport accessibility.

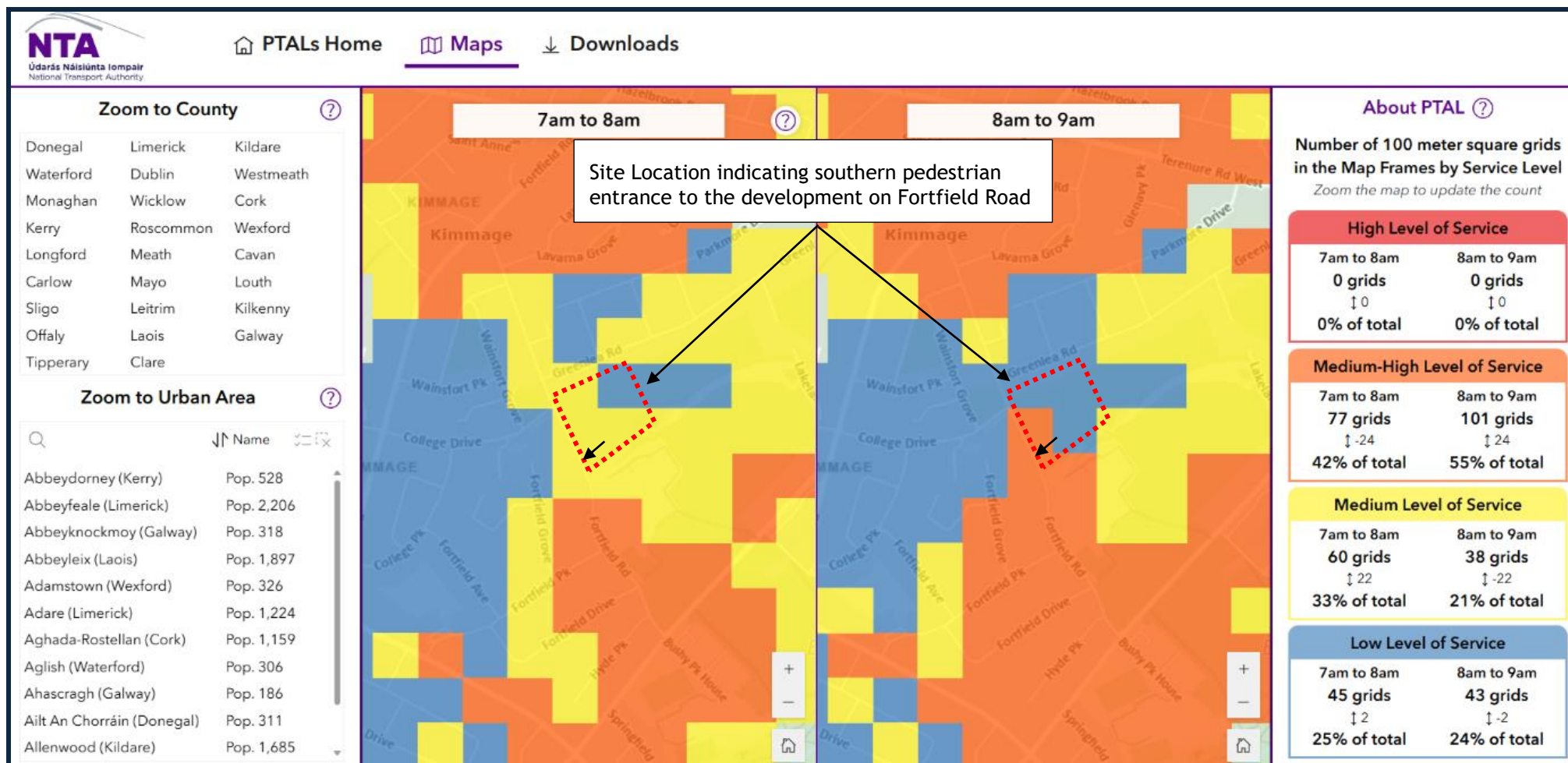


Figure 2-7: Extract from NTA's PTAL Website (as of 24/02/2025)

This designation of level of public transport services is fundamentally flawed as it does not reflect the planned introduction of the high frequency (i.e. 10-minute peak hour frequency) urban bus service in the form of the 54A service on the F1 route, which runs directly along the development frontage on Fortfield Road, under the Bus Connects Dublin Network Redesign.

Irrespective of the NTA's PTAL tool the development site still qualifies as an '**Accessible Location**' under the definition in Table 3.8 of the 2024 Compact Settlement Guidelines:

"Accessible Location

Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services."

As stated in the 'Residential Travel Plan' Section 2.4.5.2, Route No. 54A satisfies this **planned** high frequency urban bus service under the NTA's 2025 upgrade to the 54A service.

The NTA's PTAL (and TPD's inaccurate reference to it) is inconsequential to the determination of the Locational Designation of the Site as outlined and justified as '**Accessible Location**' in Section 2.1 above.

3.0 Applicant Conclusions

We believe that the parking provision proposed in the application is reasonable and in accordance with 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024), other sustainable transport initiatives and national policy - as demonstrated through this appeal, our application and our justifications - the development should not be refused on the basis of parking.

Notwithstanding the above, the Applicant would welcome An Bord Pleanála's view on the appropriate level of parking for the development in light of sustainable transport policy, the conclusions of their previous Inspector's Report and we note an appropriate planning condition identifying the required quantum of parking could easily be applied as part of a planning grant. We believe this is critical as the application of a suitable planning condition will enable the much-needed residential development to proceed.

We contend that DCC could have conditioned an additional number of car parking spaces to satisfy meet their opinion of adequate car parking quantum for the development. Such a condition would not constitute "major alterations" to the proposed development as additional parking can be accommodated via localised extensions of the basement. Such basement extensions would be contained within the block footprints of the proposed apartment blocks.

We accept that An Bord Pleanála may determine that a greater level of parking than the quantum proposed is required and that a Condition requiring same should be attached to the grant of permission. Accordingly, we include in Appendix B a revised Basement Plan and At-Grade Parking Plan illustrating the capacity for the development to accommodate increased car parking provision.

Summary of Capacity for additional Parking Provision:

Should An Bord Pleanála determine to Condition additional parking, the total number of car park spaces (residential) which can be accommodated as part of the development is 195 no. residential spaces (19 no. for housing component and 176 no. for apartment component, including car club, visitor and disabled spaces).

Due to the increased car parking quantum, the Disabled Parking Spaces has increased to satisfy DCC's 5% requirement. This has resulted in an additional 2 no. Disabled Parking Spaces at Grade and an associated reduction in Visitor and Car Club spaces.



Figure 3-1: Car Parking Facilities (Architectural Drawings by Urban Agency Architects, annotation by PUNCH Consulting Engineers)

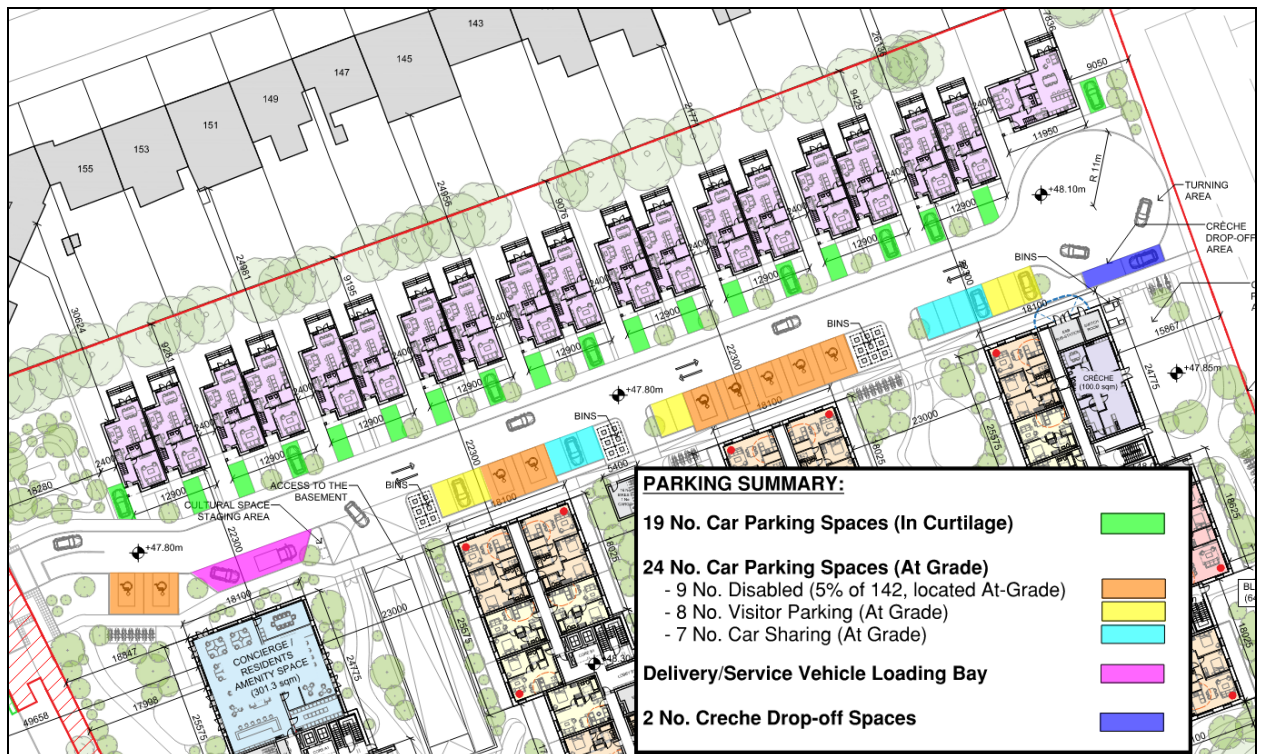


Figure 3-2: Distribution of At-Grade Parking including Disabled Car Parking (Drawing by Urban Agency Architects, annotation by PUNCH Consulting Engineers)

Residential Car Parking:

- 152 no. residential parking spaces (basement)
- 19 no. residential parking spaces (at-grade, in-curtilage)
- 7 no. Car Club parking spaces (at-grade)
- 9 no. Disabled parking spaces (at-grade)
- 8 no. Visitor parking spaces (at-grade)

The resulting Car Parking Ratio for the Apartment component is 0.57 (= 152/265), which excludes Car Club, Disabled and Visitor Spaces in accordance with the requirements of SPPR3 of the Compact Settlement Guidelines.

This is in excess of the 0.5 car parking ratio referenced in DCC Transportation Planning's report:

"A car parking ratio of 0.5 spaces per unit or below, for a standard residential development is generally only considered acceptable for centrally located and highly accessible site locations such as those Zone 1 locations within the Canals, under the Dublin City Development Plan 2022-2028."

Given the site's legitimate 'Accessible' location under Compact Settlement Guidelines (as outlined and justified in the main Appeal Response), this increased car parking provision is considered appropriate and reasonable should An Bord Pleanála seek to condition an uplift in car parking provision.

There are no changes to the non-residential car parking provision.

There are no changes to the cycle parking provision.

Important Notes:

1. This would not constitute “major alterations” as localised extensions of the basement would address this issue. These basement extensions would still be contained within the proposed apartment block footprints.
2. These basement extent modifications would have no material impact on the Architecture, Visual Impact, Basement Impact Assessment, Drainage proposals, Flood solution, Traffic Impact or Environmental Impact.
3. This has been demonstrated through the provision of relevant engineering reports outlining why this would not constitute “major alterations” with respect to the original LRD planning submission. These reports consist of the following:
 - a. Basement Impact Assessment
 - b. Engineering Planning Report
 - c. Site Specific Flood Risk Assessment
 - d. Traffic and transport Assessment
 - e. Residential Travel Plan
 - f. Car & Cycle Parking Management Plan
 - g. Outline Construction Management Plan

Appendix A - DCC Transportation Planning Division Report

**Roads Streets & Traffic Department
Road Planning Division**

APPLICATION NUMBER	WEBLRD6058/24-S3
PROPOSAL	The proposal will consist of a residential development (c.28, 169.5 sqm GFA exclu
LOCATION	Fortfield Road, Terenure, Dublin 6W
APPLICANT	1 Celbridge West Land Limited
DATE LODGED	19-Dec-2024
APPLICATION TYPE	Large Residential Development-3

The Roads Report is below

TRANSPORTATION PLANNING DIVISION

13th February 2025

LODGED PLAN NO:	WEBLRD6058/24-S3
DATE LODGED:	19th December 2024
LOCATION:	Fortfield Road, Terenure, Dublin 6W
PROPOSED:	284 no. units
FOR:	1 Celbridge West Land Limited

TRANSPORTATION PLANNING DIVISION REPORT

Proposed Development

The proposal will consist of a residential development (c. 28,169.5 sqm GFA excluding basement) providing 284 no. Units consisting of 19 no. 4-bed, 2-3 storey houses and 265 no. Apartments within 4 blocks ranging in height up to 6 storeys.

The 4 blocks of apartments provide 10 no. studios, 117 no. 1-beds, 129 no. 2-beds, and 9 no. 3-beds, along with a creche (c.100sqm + external space of 153sqm), community culture and arts space (c.1,214.6sqm + external spaces of 199sqm) and residential amenity space (c.301.3sqm).

- Block A ranges in height from 3 to 4 storeys and provides 61 no. residential units
- Block B ranges in height from 4 to 5 storeys and provides 66 no. residential units
- Block C ranges in height from 4 to 5 storeys and provides 74 no. residential units
- Block D ranges in height from 5 to 6 storeys and provides 64 no. residential units

Blocks A and B are connected by a single storey pavilion building providing the community culture and arts space.

All residential units will be provided with associated private open spaces to the north/ south/ east/ west.

Vehicular/ pedestrian/ cyclist accesses will be provided from Fortfield Road with alterations to the existing boundary wall along Fortfield Road. The development will also include the upgrading of the existing Fortfield Road and College Drive junction to a 4-arm signalised junction (in conjunction with a separate,

REPLY letter

concurrent planning application to South Dublin County Council Reg. Ref. SD24A/0268W) and the relocation and upgrading of bus stop 2397 on Fortfield Road with the provision of a covered bus shelter.

The proposal will also include 165 no. car parking spaces, 633 no. cycle parking spaces and 14 no. motorcycle parking at surface and basement level (located under blocks A, B and C), public and communal open spaces, roof gardens, landscaping, boundary treatments, plant areas, waste management areas, and services provision (including ESB substations) and all associated works required to enable this development including connection to the Uisce Éireann network.

Opinion

A LRD opinion from Dublin City Council (DCC) in accordance with Section 32A of the Planning and Development (Amendment) (Large scale Residential Development) Act 2021, was issued to the *applicant*. The Transportation Planning Division requested that following points be comprehensively addressed within the any forthcoming LRD application documentation:

- a) *The applicant is required to consult with the NTA and Dublin Bus regarding the capacity of the urban bus services serving the application site. Relevant information regarding service capacity, including existing and planned bus priority measures along the relevant bus routes within the network, should be included in the planning application to inform the applicant's justification for the scale and density of development.*
- a) *The applicant is required to consult with the DCC environment and Transportation Department and NTA regarding the design of the 4-arm signalised junction, the proposed relocation and design of the bus stop on Fortfield Road and the increased footpath provision along the eastern side of Fortfield Road, a continuous minimum width of at least 2 m should be achieved.*
- b) *A Road Safety Audit should be carried out, and made available to DCC Environment and Transportation Department as part of the review of works proposed within the public road.*
- c) *A Letter of Consent is required from Environment and Transportation Department for works within the public road.*
- d) *With regard to the proposed works to the west side of the Fortfield Road / College Drive junction, on lands within South Dublin County Council, evidence of agreement for these works or confirmation of the planning application strategy for the works should be provided.*
- e) *Pedestrian connection to Lakelands Park should be reconsidered as this would improve the wider connectivity of the area.*
- f) *A robust rationale should be provided for the proposed locational designation of the application site in accordance with Table 3.8 and SPPR 3 of the 'Sustainable Residential Development and Compact Settlements' guidelines (2024).*
- g) *A taken in charge drawing addressing the proposed junction and footpath widening on Fortfield Road is required.*
- h) *All pedestrian and cycle paths should demonstrate compliance with the relevant design standards of DMURS. All internal pedestrian access routes to Blocks should achieve a continuous minimum width of at least 2m. Where shared cycle and pedestrian access routes are proposed, it should be demonstrated that the proposed width can safely and comfortably accommodate shared use.*
- i) *The following is required to further clarify and improve cycle parking proposals:*
 - i. *It should be demonstrated that access corridors, aisles and doors providing access to resident cycle parking achieve adequate widths, in compliance with the relevant design guidance of the NTA's 'Cycle Design Manual, 2023'.*
 - ii. *The design of the visitor cycle parking provided at surface level and the quantity provided in each bank of standard should be specified.*
 - iii. *The quantity of cycle parking spaces capable of accommodating non-standard cycle equipment (e.g. cargo bikes) should be increased. NTA's 'Cycle Design Manual, 2023' recommends 5%. The additional spaces should serve both residents and visitors and should be dispersed throughout the site.*
 - iv. *Provision for e-bike charging facilities should be demonstrated.*

- v. *Staff cycle parking in a secure facility is required for the culture/arts space, in accordance with the relevant standards of Table 1 of Appendix 5 of the City Development Plan. This facility and the residential cycle parking facilities should be accessed separately.*
- j) *Discrepancies in the submitted drawings and documentation are noted, in particular in respect of the quantitative figures for car parking provision. The final application submission should be consistent.*
- k) *The following is required to further clarify and improve car parking proposals:*
 - i. *It should be demonstrated that sufficient clear space is provided to accommodate 1no. in-curtilage car parking space per house only, with suitable design measures (e.g. landscaping) provided to prevent additional parking encroachment.*
 - ii. *Review access to car share and consider relocating some spaces to surface level to benefit the dwelling units and public access.*
 - iii. *Visitor allocation appears excessive and should be reviewed. Information on the management of visitor spaces are required.*
- l) *Proposed phasing of works within the public road is required due to proposals to use the new access point as the main site access during construction.*

Relevant Planning History

LRD6004/22 (ABP Ref. ABP-314390-22): Permission REFUSED for residential development comprising 364 apartments (across 4 blocks) and 21 houses.

Note: Reason no. 3 of the Board's refusal states:

"The density of the proposed development exceeds that recommended for outer suburbs in Table 1 of Appendix 3 to the Dublin City Development Plan 2022-2028. The site is considered to be an intermediate urban location as set out in section 2.4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2022, and it is considered that the proposed density is not justified by the available capacity of current public transport facilities. The quantum of housing proposed is, therefore, excessive and would, therefore, be contrary to the proper planning and sustainable development of the area."

SD24A/0268W: Permission GRANTED by South Dublin County Council for road and water services upgrade works on Fortfield Road and College Drive, to facilitate junction works under subject LRD proposal.

HA29N.316272: Permission GRANTED by An Bord Pleanála for BusConnects Templeogue / Rathfarnham to City Centre Core Bus Corridor scheme.

Submissions/Observations

A large volume of submissions are noted on file at the time of this report. Issues raised of relevance to this division include:

- Overspill parking
- Increased traffic congestion
- Inadequate vehicular access / servicing facilities within site
- Cumulative impact with permitted BusConnects works
- Lack of public transport infrastructure to accommodate development
 - Lack of capacity on existing / planned bus services, contrary to conclusions of submitted public transport capacity assessment
- Lack of cycle infrastructure to accommodate development, including lack of cycle lanes on Fortfield Road
- No contribution to improvement of public transport / cycle facilities in area

- Development should contribute to improved pedestrian facilities along school routes, noting large number of schools / childcare facilities accessed via Fortfield Road
- Previous concerns regarding public transport capacity, which informed An Bord Pleanála decision, have not been addressed
 - Inaccurate walking distances to local amenities / facilities provided
 - Site is not within walking distance to be considered an 'Accessible' location
 - Site should be classed as 'Outer Suburb' and 'Intermediate Urban' location
- Inaccurate public transport journey times provided
- Reduced permeability to Lakelands Park
 - Seeks removal of gate on Lakelands Park, indicated on Site Plan to be retained
 - Seeks clarity on maintenance / security of any access to park
- Increased traffic hazard at proposed access junction, due to proximity to Fortfield Road / Greenlea Road junction
 - Signalised junction and/or pedestrian priority improvements, yellow box should be provided at Fortfield Road / Greenlea Road
- Traffic management of junctions is uncoordinated between DCC and SDCC
- Traffic / transport analysis based on inaccurate data
- Disputes effectiveness of car-share to supplement allocated residential parking
- Bus shelter at proposed re-located bus stop no. 2397 is unnecessary
- Overly car dominant due to perpendicular parking
- Road Safety Audit should be undertaken

NTA:

- Considers the proposed re-location of the bus stop acceptable
- Raises concern with reliance on two-tier vertical racks for long term cycle parking
 - Provision should be revised, including increased quantity of Sheffield stands, provision for e-bikes / larger cycle equipment

TPD Comments

Site Context

The application site occupies the north-west corner of the land at Terenure College, and also includes an existing lake at the site, which gives the site an irregular shape, stretching from the western Fortfield Road site boundary to the Greenlea Grove and Lakelands Park site boundary to the east.

Fortfield Road will be the primary point of access to the development. Fortfield Road connects with Blessington Road / Templeogue Road to the south and with Wainsfort Road to the north of the site. Fortfield Road has a 50km/h speed limit and traffic control measures in the form of speed ramps. It is not served by cycle lanes, the closest being located on Templeogue Road and Wainsfort Road (both in the form of advisory on-street cycle lanes). There are no parking restrictions at Fortfield Road or the surrounding local roads, with on-street parking freely available.

Fortfield Road is served by the 54A bus route (Kiltipper – City Centre). The closest existing bus stop to the south at Templeogue Road is served by the 15 (Ballycullen – Clongriffin via city-centre); 49 (Tallaght – City Centre); 65 (Blessington – City Centre) and 65B (Fortunestown – City Centre). Blessington Road / Templeogue Road forms part of the permitted Bus Connects CBC 10, connecting Tallaght with the City Centre.

From an analysis of the site using the NTA's Public Transport Accessibility Level (PTAL) tool, the site is determined to have "very poor to poor" public transport accessibility. This indicates limited access to public transport, likely requiring more reliance on other transport modes.

The site is within convenient walking distance of some local shops / amenities on Greenlea Road, in addition to sports / recreational amenities and community amenities. A greater variety of neighbourhood services and amenities are available in both Terenure and Templeogue villages, each c. 15-20 minutes walking distance from the proposed residential component of the site. The application site is closer to Templeogue Village (1 km to the south) than Terenure Village (1.6 km to the north). It is some 6 km from the city centre to the north and 3.5 km from Junction 11 of the M50 to the south.

Lakelands Park is a residential cul-de-sac accessed from Templeogue Road. At the northern end of the cul-de-sac, there is an existing gated entrance to the site. Submissions recorded on file state that the gate is no longer in use. Lakelands Park is connected to Greenlea Grove and Greenlea Road to the north via a private pedestrian laneway.

Access/Public Road

Vehicular Access:

Vehicular access to the site is proposed from Fortfield Road, at the junction with College Drive. The applicant proposes to provide a 4-arm signalised junction at this access, with controlled pedestrian crossings on all arms. The existing signalised pedestrian crossing on Fortfield Road just north of proposed junction is also proposed for removal. The proposed works to the western side of Fortfield Road and the access junction are located within South Dublin County Council (SDCC), and a concurrent planning application to SDCC for the required works is noted (see Planning History above). A letter of consent for inclusion of lands within DCC ownership is included with the application.

It is noted that the proposed junction works formed part of the previous LRD application at the subject site (see Planning History above) and that the design of the proposed works was informed by feedback from DCC traffic as part of the pre-planning process for that application. Agreement to the design of the junction will be subject to final decision on the concurrent application to SDCC.

Public Footpaths:

The width of the existing footpath on the eastern side of Fortfield Road (i.e. adjacent to the site) is not consistent and is constrained in places by street furniture and street trees, resulting in a useable pedestrian area of sub-standard width in accordance with DMURS. The existing site boundary to Fortfield Road comprises a high stone wall at the back of the public footpath. As per the submitted landscape plans, the boundary wall will be predominantly retained south of the proposed access junction, but will be reduced in height and capped with a railing (overall height of c.1.4m). The footpath would however be supplemented by a parallel pedestrian route within the site which retains a continuous clear width of at least 2m (as set out in the submitted DMURS Compliance Statement). Access from the public footpath to the pedestrian route is provided at multiple locations. This solution is considered, on balance, to provide for adequate pedestrian movement along Fortfield Road.

Parklands Access:

The eastern portion of the application site comprises existing parkland arranged around a lake. The application proposes to provide this parkland for use as public open space. The submitted landscape drawings illustrate that there is existing gated access to the parkland from Lakelands Park, the Terenure College Rugby Club grounds (to the north) and the Terenure College school grounds (to the south). The submitted Landscape Design Report sets out an access strategy for the parkland, which illustrates that the parkland will be accessed from the residential component of the development (fully permeable arrangement) and from the school grounds. The operation and management of access from the school grounds should be clarified.

Use of the existing access gates to the rugby club grounds and Lakelands Park is not proposed. This division considers that use of the Lakelands Park access gate would enhance pedestrian / cyclist connectivity of the proposed residential development to amenities / services east and north of the application site, including public transport services. Additionally, this access would greatly enhance public

access to the proposed public open space and would generally improve pedestrian / cyclist permeability within the receiving area.

Re-located Bus Stop:

It is proposed to relocate existing bus stop no. 2397, which currently conflicts with the proposed northern access, 50m to the south. A setback is proposed to allow a 1.8m wide footpath in front of and behind the proposed bus stop. Provision of a bus shelter is also proposed.

Evidence of consultation with the NTA regarding the relocation of the bus stop is included in the submitted material. The NTA has raised some concern that the resulting significantly reduced distances between bus stops (i.e consecutive outbound stop nos. 2397 and 2398) is not in accordance with best practice from a service planning perspective. The NTA requested that possible alternative locations are explored in the design process.

The applicant has presented a rationale for the proposed location of the bus stop, with reference to avoiding conflict with the new signalised junction and existing dwellings and the capability of accommodating the upgraded bus stop along the site frontage. This division would also note that there is capacity in the existing layout of Fortfield Road to relocate bus stop no. 2398 further south in the future, if required. The proposed re-location of bus stop no. 2397 is considered acceptable to this division, having regard to the foregoing. The detailed design of the proposed bus stop should be addressed by condition prior to commencement of development, in the event of a grant of permission.

Quality Audit

The content of the submitted Quality Audit (including Stage 1 Road Safety Audit) are noted. 1 no. issue is identified regarding provision of suitable kerb heights at the proposed re-located bus stop. The audit notes that issues raised and addressed in previous iterations are not repeated in the current audit. A Stage 3 Road Safety Audit should be prepared and submitted to the Planning Authority prior to opening of the development to traffic.

Servicing

Servicing is proposed to take place within the site. A turning area is proposed at the eastern end of the internal access road. A loading bay is proposed on the internal access road adjacent to Block A. This will accommodate deliveries and refuse collection. The proposed refuse storage and staging areas along the access road as set out in the submitted Operational Waste Management Plan are noted. The submitted vehicular swept path drawings demonstrate sufficient turning and maneuvering for all vehicles along the access road. Fire tender access to all blocks along internal pedestrian/cycle routes (including turning head) is noted.

Parking enforcement proposals within the Car & Cycle Parking Management Plan to avoid obstruction are noted. In addition, the proposed signalised junction and the bus stop would restrict opportunities for overspill parking on Fortfield Road adjacent to the site access.

Taking-in-charge

A taking in charge drawing has been submitted. The pocket park / attenuation feature adjacent to the main vehicular entrance to the site is proposed to be taken in charge. The remainder of the site, including internal roads and parking, would be managed and maintained by an appointed management company.

Residential Travel Plan

The contents of the submitted Residential Travel Plan are noted. The Plan seeks to reduce reliance on private car travel and facilitate alternative sustainable travel means (active travel, public transport). Census 2022 travel pattern data is noted and has informed the target modal splits for sustainable travel. It is considered that additional permeability from the site through Lakelands Park, as set out above, could assist with the implementation of the measures set out in the Plan.

Public Transport Capacity

The contents of the submitted Public Transport Capacity Audit are noted. Based on 2 no. surveys carried out in 2024, and on the basis of the mode shares set out in the Residential Travel Plan, the audit found that the current capacity on the high frequency bus routes serving Blessington Road / Templeogue Road is

sufficient to accommodate the additional demand that would be generated by the development. In respect of item (a) of this division's Stage 2 Opinion Report, the applicant notes that they sought consultation with the NTA and Dublin Bus but were not able to obtain feedback regarding service capacity.

Cycle Parking

Cycle parking for the proposed houses is provided within the curtilage of each unit.

A total of 611no. cycle parking spaces are provided to serve the apartments, comprising 465no. long term spaces and 146no. short term spaces. This provision for residents and visitors exceeds the Dublin City Development Plan 2022-2028, Appendix 5, Table 1 minimum standards and the minimum standards of SPPR 4 of the Sustainable and Compact Settlements guidelines (2024). A variety of secure cycle storage facilities are provided throughout the development at basement and ground floor level within the blocks. Visitor cycle parking is provided externally at surface level..

The cultural / arts space is served by 12no. visitor spaces (including 1no. cargo bike stand) and 4no. secure staff spaces at basement level.

The residential provision includes a total of 33no. larger stands capable of accommodating non-standard cycle equipment (25no. long term, 8no. visitor). A total of 48no. long term spaces at basement level are equipped with e-bike charging facilities. All remaining long term cycle parking appears to be in the form of double-stack, while all remaining visitor parking is in the form of Sheffield stands.

Cyclist access to the basement is via a cycle ramp adjacent to the vehicular ramp, in addition to the stair / lift cores serving blocks A, B and C. Access aisles, doorways and corridors providing access to cycle parking accord with the minimum widths specified in the guidance of section 6.5 of the Cycle Design Manual, 2023.

The submission from the NTA expresses concern at the overall quantity of double-stack parking proposed and seeks an increased quantity of Sheffield stands and e-bike charging facilities. This division considers the e-bike charging facilities proposed, at 10% of the total of long term spaces, is sufficient. Provision of additional ground level (e.g. Sheffield) stands should be addressed by condition in the event of a grant of planning permission.

Locational Designation of Site:

A justification for the proposed car parking ratio is provided in the submitted Traffic & Transport Assessment (TTA). Having regard to the criteria of Table 3.8 of the *'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities'* (2024), the applicant considers that the subject site constitutes an "Accessible Location", as it is located:

- Within 500m walking distance of an existing or planned BusConnects Core Bus Corridor (CBC) stop.
- Within 500m (i.e up to 5-6 minute walk) of existing or planned high frequency (i.e 10-minute peak hour frequency) urban bus services.

Section 11.1.1 of the TTA seeks to illustrate that the southernmost of the proposed pedestrian entrances to the site would be c. 480-490m walking distance from a planned inbound BusConnects stop on Blessington Road. It is however noted that the stop location used is taken from the Preferred Route of the Tallaght to Terenure CBC, and not the more recent (and now permitted) Templeogue / Rathfarnham to City Centre CBC (refer to Planning History above). Sheet 34 of 42 of the General Arrangement Drawings submitted with the CBC application illustrates the permitted bus stop, which is some 20m west of the location illustrated in the TTA. Given this, the walking distance provided in the TTA does not appear to be accurate.

Given the location of the planned BusConnects stop, the proposed designation of the site as an 'Accessible' location is incorrect and not accepted by this division. This division would in any case have concerns with this designation because the 500m distance does not reflect the walking distances and

times for future residents to planned high frequency bus services whereby all proposed residential units are located more than 500m walking distance from these planned services, substantially so in the case of Block D for example.

An Bord Pleanála in its assessment of the previously refused LRD application on site considered the site to be an *“intermediate urban location”* under the ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ (2022). The Board Inspector’s Report sets out that this is in part due to the *“moderate”* level of existing bus service provision serving the site and the lack of additional 2-way continuous bus lane provision along the CBC route planned as part of BusConnects. This division does not consider that the accessibility of the site, in the context of the Inspector’s assessment, has significantly changed in the interim to reclassify the site as an ‘accessible location’.

It follows, therefore, that the site would be designated an ‘Intermediate’ location under the Compact Settlement Guidelines, for which the maximum car parking rate would be 2no. spaces per dwelling in accordance with SPPR 3 (iii) of the Guidelines. The applicant has therefore failed to address item (g) of this division’s Opinion Report. The site location’s level of relative accessibility is further demonstrated by the PTAL result, referred to above in this report.

Car Parking:

The application site is located in Area 2 of Map J of the Dublin City Development Plan (2022-2028). The maximum provision as per Table 2, Appendix 5 of the Dublin City Development Plan 2022-2028 is 284no. spaces for the residential component of the proposed development. In addition, a maximum of 4no. spaces could be allocated to proposed community / cultural / arts use and a maximum of 1no. space could be allocated to the childcare facility.

The submitted Car & Cycle Parking Management Plan sets out that a total of 157no. car parking spaces are provided throughout the development at basement and ground floor levels. The car parking comprises:

- 1no. car parking space is provided within the curtilage of each house (19).
- 117no. spaces (112no. allocated to apartments, 4no. indoor cultural / art space, 1no. allocated to childcare facility staff) at basement level.
- 26no. spaces (7no. accessible, 10no. car-share, 9no. visitor) at surface level.

A reduced quantity of visitor spaces and re-location of car-share spaces to surface level is noted in response to issues raised at LRD Stage 2. A minimum 5% motorcycle and accessible, and 50% EV charging allocation noted. Additionally, soft landscaping is noted within the front gardens of the proposed houses to prevent additional parking encroachment.

The proposal results in a car parking ratio of 0.42 per unit for the 265no. residential apartments excluding car-share, visitor and accessible parking allocation (as per SPPR 3 of the Compact Settlement Guidelines, 2024). When including the houses, the resulting ratio is 0.46 per unit for the 284no. total residential units. Given the site’s accessibility in accordance with Table 3.8 of the Compact Settlement Guidelines as set out above, and having regard the suburban location of the site, the layout and nature of roads adjacent to the site, and to the frequency of bus services and quality of bus infrastructure (both existing and planned) serving the site, the proposed car parking provision is of serious concern to this division and considered inadequate to serve the needs of future residents of the development.

It has not been demonstrated to the satisfaction of this division that the proposed significant relaxation of the maximum standards for Parking Zone 2 is justified in accordance with the criteria set out in Section 4.0 of Appendix 5 of the City Development Plan. Future residents would generally appear to be within 10 minutes walking distance of high frequency bus services, however there are no other high frequency public transport options within convenient walking distance. A car parking ratio of 0.5 spaces per unit or below, for a standard residential development is generally only considered acceptable for centrally located and highly accessible site locations such as those Zone 1 locations within the Canals, under the Dublin City Development Plan 2022-2028. Of note, the applicant’s contention that the site is within an accessible location under SPPR3 of the Compact Settlement Guidelines, that classification seeks up to a maximum of 1.5 per unit.

As stated above, the relevant maximum threshold for car parking under SPPR 3 of the Compact Settlement Guidelines is 2no. spaces per dwelling within the intermediate and peripheral location this division consider the site being located. It is acknowledged the applicant has demonstrated that a reduction below this maximum standard can be accommodated. The proposed alternative mobility options are noted, including the proposed variety and type of cycle parking and the availability of car-share spaces, however these are not sufficient to overcome the locational constraints of the site.

Given the low car parking ratio, there are additional concerns that the development would result in increased overspill parking. While the submitted car parking management plan states that parking in prohibited areas would be managed and enforced within the site, there are concerns that overspill would lead to obstructions of junctions and bus routes on roads adjacent to the site, in particular on Fortfield Road. The issue of observed overspill parking in the area was raised in numerous third party submissions recorded on file, with many noting significant spikes in demand for parking during school drop-off / pick-up in the area and during organized sporting and social events at nearby facilities.

Traffic and Transport Assessment Scope

The submitted assessment scope is generally acceptable and the modelling of junctions Fortfield Road / College Drive, Fortfield Road / Templeogue Road / Bushy Park House, and Fortfield Road / Wainsfort Road / The Orchard is noted. It is noted that the Fortfield Road / Templeogue / Bushy Park House Signal Controlled Junction is predicted to be operating above practical capacity by 2028 (AM Peak) with and without the proposed development. The applicant considered that this level of service for a signalised junction is considered acceptable in an urban environment and that the junction could be altered to improve capacity in the future. The analysis concludes the development would have little impact on the operational capacity of the surrounding road network.

Construction Management

The contents of the submitted Outline Construction Environmental Management Plan (CEMP) and Outline Construction Management Plan are noted. Construction works are proposed to be completed in a single phase. Following creation of the site access, a temporary bus stop facility would be established to compensate for the loss of the bus stop at the entrance to the site. Details on the delivery of the permanent bus stop and signalized junction as part of the works should be clarified by condition in the event of a grant of planning permission.

Recommendations

The development as proposed has not adequately responded to issues and concerns raised by this division at opinion stage. As such, this division continues to have serious concerns regarding the development. As it is not possible to request Further Information on these matters having regard to the opinion stage and it would not be appropriate to condition major alterations, it is recommended that permission be refused for the development for the following reasons: -

1. The applicant has failed to demonstrate that the range of travel needs of the future resident population can be met by the proposed development. Having regard to the site's accessibility in accordance with Table 3.8 of the Compact Settlement Guidelines, the suburban and residential location of the site, the layout and nature of roads adjacent to the site, and to the frequency of bus services and quality of bus infrastructure (both existing and planned) serving the site, the proposed car parking provision is considered inadequate to serve the needs of future residents of the development. It is considered on this basis that the proposed development would give rise to unacceptable levels of overspill and haphazard parking on adjacent roads and bus corridors, and would seriously injure the amenities of the area and would endanger public safety by reason of traffic hazard and obstruction of pedestrians, bus services and other road users. The development is therefore considered contrary to Policy SMT27 and Appendix 5, Section 4.0 of the Dublin City Development Plan 2022-2028, Section 5.3.4 of the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024) and Section 4.23 the Sustainable Urban Housing: Design Standards for New Apartments (2023). The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Shane McGlynn, Executive Planner

Gareth Hyland, A/ Senior Executive Planner
On Behalf of Edel Kelly, Senior Transportation Officer

Appendix B - Basement Car Parking Option

