

APPENDIX (A)

DCC Departmental Reports

ABP – 313278 – 22

(DCC Ref: SHD009/22)

White Heather Industrial Estate, South Circular Road, & 307/307a South Circular Road and 12a St James's Terrace, Dublin 8.

TRANSPORTATION PLANNING DIVISION

23rd May 2022

SHD REFERENCE:	SHD 0009/22
LOCATION:	White Heather Industrial Estate, South Circular Road, Dublin 8, 307 / 307A South Circular Road, Dublin 8 and 12A St James's Terrace, Dublin 8
PROPOSED:	Demolition of all existing buildings on site and construction of mixed residential and commercial development consisting of 335 no. Build-to-Rent units, café, childcare facility, residential amenities and associated site works.

TRANSPORTATION PLANNING DIVISION REPORT

Proposed Development

In summary, planning permission is sought for the construction of a residential and commercial development on a 1.535 ha site consisting of:

- Commercial floorspace of 30,242 sqm.
- 335 no. Build-to-Rent (BTR) units
 - A terrace of 7 no. 3 bed townhouses
 - 7 no. blocks (2 – 10 storeys) of 328 no. apartments
- Childcare / crèche of 260 sqm.
- 106 no. car parking spaces
 - 41 no. at surface level
 - 5 no. spaces for terrace townhouses
 - 3 no. Creche spaces
 - 65 no. at undercroft level
- 558 no. cycle parking spaces
 - 352 no. at surface
 - 67 no. short stay / visitor spaces
 - 206 no. undercroft
- Realignment and improvement works to the existing entrance junction on South Circular Road

Pre-application Consultation

An Bord Pleanála's pre-application consultation opinion (ABP Ref: 311359-21 dated 7th December 2021 is noted.

The response outlined that 21 no. Items are to be addressed in the application. Item No's. 15, 19 and 20 relate specifically to this division.

Item 15:

A response to the issues raised in the Drainage Planning Report and the Transportation Planning report, accompanying the PA Opinion submitted on the 7th October 2021.

Item 19

A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

Item 20

Site specific Construction and Demolition Waste Management Plan

In addition, this division raised a number of matters to be addressed within any future planning application. These can be found within the Transportation Planning Report dated 4th October 2021 of ABP Ref; 311359-21.

Submission/Observations

TII – No observations.

Irish Waterways – maintenance access and Grand Canal Greenway

Observations have raised the following matters of relevance to this division:

- Car parking ratio limited and overspill parking into adjacent streets. Applicant has not demonstrated that the car parking provision won't result in a negative impact on surrounding roads.
- Junction to development will be very dangerous for cyclists and pedestrians. School route. Located on a dangerous bend.
- Increase in pedestrians and cyclists on St. James Terrace in proximity to several vehicular exits, a narrow street, conflict between cars and pedestrians and cyclists and potential overspill parking. Others welcomed the pedestrian access via St James terrace.
- Lack of any co-ordinated proposals to improve cycling infrastructure or access into the site from elsewhere.
- Construction vehicles for both White Heather and Bailey Gibson sites, impact on South Circular Road including cyclists and pedestrians.
- Additional vehicular traffic resulting in traffic hazards within the local road network.
- Cumulative impacts of the numerous large scale residential developments in the vicinity of the subject site have not been taken into account in this SHD application.
- The proposed opening up to have canal side walk and open areas will only give rise to antisocial activity and increased noise level.
- All parking should be EV spaces.

TPD Comments

Location

The site is bounded by South Circular Road to the north, Priestfield Cottages to the east, St James' Terrace to the west and the Grand Canal to the south.

The application boundary appears to be setback approximately 6.5 m from the canal. A further approximately 7.5 m wide landscape strip within the boundary is proposed along the canal frontage. The proposed development includes works to the public domain at the junction with South Circular Road. Landscaping proposals also appear to be proposed within the public domain adjacent to the site access. The application boundary along the eastern boundary appears to vary.

The site is within walking distance of bus services along South Circular Road and Dolphin's Barn. Dolphin's Barn is a Bus Connects Core Bus Corridor (CBC), Greenhills to City Centre. Fatima Redline Luas Stop is within 10 minutes walking distance. The city centre is within 2.8 km, approximately 35 minutes walking distance or 10 minutes cycling distance.

Walking and Cycling Accessibility and Infrastructure sections as outlined within the Traffic and Transport Assessment (TTA) are noted. The Community & Social Infrastructure Audit is also noted. Existing signalised pedestrian crossings at the Dolphin's Barn and South Circular Road junction and the South Circular Road and Donore Avenue junction are noted. Whilst the site is highly accessible with regards to cycling, there is limited cycling infrastructure in place along the main connecting routes including no cycle lanes along South Circular Road or on the side streets connecting to the city centre, and advisory lanes on Dolphin's Barn and Clanbrassil Street Lower. Future proposals to improve the cycle lane network near the site are noted including the Grand Canal Greenway, the Primary Routes 8 and SO1 / N10 and the Secondary Routes 8C and SO2.

Access and changes to the public road

Vehicular access is proposed via the existing White Heather Industrial Estate junction with South Circular Road. The speed limit along South Circular Road is 50kph.

Upgrades to the existing junction are proposed and a letter of consent has been issued and submitted in the application consenting to the inclusion of public lands in order upgrade the junction.

It is proposed to change the existing access to a simple priority of 5.5 m width and 5 m radii. Drawings have been submitted confirming that the proposed junction design allows for the access and egress of servicing and emergency vehicles for both the site and the adjoining Priestfield Cottages. The junction has been designed to DMURS standard. It is noted that the proposed design will also improve the junction layout which is shared with the adjoining Priestfield Cottages and create 2 separate accesses both to Priestfield and the application site. The existing arrangement is of a c.21 m wide vehicular access. The proposal will create 2 no. vehicular access points with buildouts and substantially improved pedestrian facilities

A drawing have been submitted showing that visibility splays can be achieved each way for the access to the proposed development. However, no visibility splay are provided for the amended access into Priestfield Cottages. This matter was raised at opinion stage and has not been addressed. As noted under item 2.1 in Stage 1 RSA (Appendix C of the TTA), the visibility splays along South Circular Road may be obstructed for drivers exiting both access point by vehicles parked along the south side of the road. Measures ensure visibility splays can be

achieved shall also address Item 2.2 of the RSA. In the event of an approval and in agreement with the Area Engineers in DCC, the applicant shall ensure that visibility splays can be achieved for the revised access points to both the application site and Priestfield Cottages.

Pedestrian visibility for pedestrians walking from the north / west and either entering the site or continuing eastward may be restricted by soft / hard landscaping on the north side of the internal access road. In line with Item 2.3 of the RSA, the applicant shall ensure that no hard or soft landscaping is located within the public realm along the north side of the internal access road close to the access with South Circular Road. It is noted that on some submitted drawings the uncontrolled pedestrian crossings of the site junction and Priestfield Cottages are setback from the public footpath along South Circular Road. For the avoidance of doubt, pedestrian crossings of junctions with South Circular shall align with the existing public footpath and the established pedestrian desirelines. Any stop marking will need to be setback to facilitate this.

While the main pedestrian and cycle access is via the South Circular Road junction, an additional pedestrian and cycle access is proposed from Dolphin's Barn via St James' Terrace and between proposed Blocks B01 and T09. A continuous 190 m amenity strip along the Grand Canal Linear Park is proposed which facilitates direct access onto the canal frontage. This would allow linkages to any future Grand Canal Greenway proposals in this location. Clarity on whether this setback area is to be taken in charge should be addressed through conditions.

Overall, this division welcomes the improvements to the vehicular access and particularly, the improvements to pedestrian movements at the access along South Circular Road. In the event of planning permission being granted, the applicant shall seek the written agreement with the Environment & Transportation Department at DCC.

Internal Access Roads

The TTA notes that recommendations of the RSA have been taken into consideration into the design of the main internal access road, particularly with regard the potential for vehicles travelling at high speed. The TTA states that the internal access road will be designed to maximise pedestrian and cycling priority. Previous concerns raised by this division regarding pedestrian safety and the overall design for pedestrians being unclear has been amended to include corduroy paving along the footway edges where it meets the shared surface in order to improve the legibility for visually impaired pedestrians and all other users. Reference to DMURS is noted and maximising permeability and priority for pedestrians and cyclists through design.

None of the internal roads are proposed to be taken in charge.

It is not clear from the submission if Irish Waterways right of way and maintenance access requirements have been accounted for.

Service and delivery

All servicing needs for the development will take place from within the site. Section 5.7 and 5.8 of the TTA states that all servicing is to be provided in centralised locations in the vicinity of each block.

Bin storage areas will be provided internally with bins brought out to the appropriate set down areas by the management company for collection. Access routes for service vehicles have been assessed using Auto Track to ensure a 7.9 m refuse vehicle can access and egress the site

safely. Full analysis drawings are provided in SYSTRA Drawing No. 300726-010 included within Appendix B of the TTA and within the package of plans submitted.

Bin collection days / times will be staggered to reduce the amount of bins and service vehicles within the site at any one time.

A concierge service will be provided by the management company for the whole site, located within Block 3, with small / standard deliveries being left at that point and the recipients contacted for collection. The applicant confirms that there will be no allocated vehicular set down / pick up points, however, the submitted auto track drawings and Figure 37 within the TTA show the ability of an LGV and refuse vehicle being able to pass without incident along the northern spine road.

Emergency vehicle access

Fire tender access with vehicles of 8.7 m in length have also been auto tracked and drawings submitted demonstrating that such vehicles can access all blocks without issue.

Mobility and Parking

The proposed development is Built-to-Rent (BTR) accommodation. 335 residential units are proposed and an approximate population of 723 persons are noted. Additional management requirements and commercial uses and their mobility requirements are also noted. The Mobility Management Plan is noted.

Car Parking

The maximum car parking standard for the location as per the Development Plan Map J and Table 16.1 is 1 space per unit.

A total of 106 no. spaces are proposed to serve the development of 335 no. units. 4 no. motorcycle spaces are also proposed. The break down of vehicle parking spaces is as follows:

- 106 no. total car parking spaces (including 7 accessible spaces)
 - 103 no. spaces for residential use
 - 65 no. at under-croft / basement level
 - 4 no. of which are Car Club spaces
 - 38 no. at surface level
 - 3 no. of which are Car Club spaces
 - 3 no. for Crèche use at surface level.

The 96 no. car parking to serve the 335 BTR units, minus the car share (7) and crèche (3) car parking equates as a car parking ratio of 0.28. This is a slight increase than that proposed during the opinion stage. The overall layout and design of the car parking is acceptable to this division. The crèche drop off / parking is considered acceptable. At least 20% of all car parking spaces will be fitted with electric charging points with the remainder future proofed for the provision of 100%. In addition, the applicant has also confirmed that the internal road network and car parking at surface level will remain in private ownership and will not be taken in charge.

Having regard to precedent in the vicinity together with a clear rationale within Section 6 of the TTA along with a Car Parking Management Strategy, Section 7.2, the level of car parking serving the development is acceptable to this division.

Cycle Parking

The Development Plan standards is a minimum 1 cycle parking space per unit. The Sustainable Urban Housing: Design Standards for New Apartments standard is 1 space per bedroom for residents and 1 space per 2 units for visitors.

The applicant is proposing a total of 558 no. cycle parking spaces, including 8 no. cargo bike spaces. The cycle parking will be shared as following:

- 206 no. secure long stay spaces at under-croft / basement
 - 2 no. cargo bike spaces
- 352 no., spaces at ground floor level
 - 290 no. secure long stay spaces
 - 6 no. cargo bike spaces
 - 62 no. visitor

The proposed cycle parking provision ratio for residents results in 488 no. long stay secure cycle parking spaces split between dedicated cycle parking compounds at surface level and at under-croft / basement level. An additional 8 no. cargo cycle parking spaces are provided. This is in line with the desired cycle parking standards within the Sustainable Urban Housing: Design Standards for New Apartments guidelines. All remaining spaces are designed as short stay visitor spaces located at multiple locations across the development.

The target for commuting cycle mode share for the proposed development is 20.1%, although as above varying targets are noted within the MMP.

Table 2 in the MMP outlines the proposed cycle parking provision within each building and how this corresponds to proposed units. Figure 7 in the MMP and the accompanying SYSTRA drawing No's. 300726-001 and 300726-003 highlight the locations of proposed residential and visitor cycle parking spaces is noted. Both figures are welcome.

Traffic and Transport Assessment and Environmental Impact Assessment

The assessment within Chapter 10 of the EIAR and the TTA are noted. Traffic generated by the existing industrial estate has been estimated. The estimated trips generated by the proposed development shows a small increase in trips as well as a reversal of travel patterns i.e. increased outgoing AM traffic and reduced inbound AM traffic as well as increased inbound PM traffic and reduced outbound PM traffic. The existing commercial use generates more incoming traffic during am peak hours and more outgoing traffic during pm peak hours than the proposed.

The assessment references that service and delivery vehicles generated will be negligible, however it is not clear how this conclusion can be reached for the proposed 335 residential units with additional uses and limited car parking provision. It is reasonable to assume that a substantially car free development is likely to generate service and delivery vehicle trips which has the potential to be noticeable. However, it is accepted that such traffic is likely to be spread throughout the day and as such, the impact during peak hours are likely to be low.

The traffic impact, junction impact analysis and consideration BusConnects proposal is noted. It is noted that the junction assessment takes account of committed developments adjacent to the site.

Construction Management Plan

The submitted EIAR, Construction Traffic Management Plan (CTMP) and the Outline Construction Management Plan are noted.

The framework for traffic routing, management and mitigation measures outlined within the CTMP are noted. The methodology applied for estimating construction vehicles relates to deliveries of materials and estimates on average 22 construction/HGV vehicle movements per Day for a development of the proposed scale which is expected to spread over 3.5 years. The estimate does not appear to consider the bulk excavation and site enabling works phase which when a basement is proposed, tends to generate more HGV trips albeit for a temporary period. Daily construction workers are estimated to range between 100-200 depending on the construction stage. Temporary car parking facilities is to be provided within the site.

In regards to the existing access, potential conflict with the Priestfield Cottages junction is noted. The proposed works to the junction would address this, but it is not clear if this is proposed to take place as part of the early construction phases. Temporary measures might have to be considered in order to implement the necessary construction traffic management measures.

Mitigation measures outline in Section 10.7.2 are noted. A schedule or compendium of mitigation measures and monitoring commitments to provide clarity and to assist with enforcement does not appear to have been submitted.

Recommendations

If the Board is minded to grant planning permission, the following conditions are recommended:

1. (a) Prior to commencement of development, and on appointment of a main contractor, a Construction Environmental Management Plan having regard to construction mitigation measures and monitoring commitments outlined in the Environmental Impact Assessment Report shall be submitted to the planning authority for written agreement. This plan shall provide details of intended construction practice for the development, including construction compound(s), traffic management, hours of working, noise and dust management measures and off-site disposal of construction/demolition waste.
- (b) Traffic management shall be set-out in a Construction Traffic Management Plan providing details of the traffic management programme, routing and access arrangements, estimated vehicle numbers and phasing, traffic management safety and monitoring measures and applicable licenses and permits requirements. Any temporary measures and works to the site junction in order to reduce potential conflict with Priestfield Cottages junction shall be identified.
- (c) A construction phase mobility strategy incorporating onsite mobility provisions shall be submitted.
2. A minimum of 491 no. secure resident cycle parking spaces (including 3 no. secure cargo bike spaces) and a minimum of 67 no. visitor cycle spaces (including 5 no. cargo bike spaces) shall be provided. Resident cycle spaces shall be secure, conveniently

located, sheltered and well lit. Key/fob access should be required to resident bicycle compounds. All cycle parking design including visitor parking shall allow both wheel and frame to be locked. Electric bike charging facilities within the resident cycle parking areas shall be provided.

3. Prior to the commencement of the development, a revised surface car parking layout shall be submitted to the planning authority for written agreement. The most northern perpendicular car parking space located adjacent to Block 02b shall be omitted and the indented bay redesigned to facilitate improved turning requirements for a refuse vehicles.
4. The applicant shall undertake to implement the measures outlined in the Mobility Management Strategy.
 - a. The applicant shall incorporate a Car Parking Management Strategy for the overall development which shall address the management and assignment of car spaces to residents and commercial uses over time and shall include a strategy for the crèche, medical centre, drop-off and visitor parking. The Strategy shall address the management of access roads, turning areas and loading bays to prevent overspill parking. Car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements. A minimum 7 no. car parking spaces within the development shall be permanently allocated to Car Club use.
 - b. The Mobility Management Strategy shall incorporate a Cycle Parking Management Strategy for the overall development which shall address the management and assignment of cycle spaces to residents, staff and visitors. Electric bike charging facilities shall be provided for residents and staff cycle parking. Key/fob access should be required to bicycle compounds. Cycle parking design including visitor parking shall allow both wheel and frame to be locked. Shower and changing facilities shall be provided for all staff including specific shower facilities within crèche for its staff. Cycle parking shall be in situ prior to the occupation of the proposed development.
5. A minimum 20% of both basement and surface car parking spaces and 50% of car share spaces shall be fitted with electrical charging points and all remaining spaces shall be ducted to facilitate future cabling to serve charging points for Electric Vehicles.
6. Prior to the commencement of development, all works proposed along South Circular Road and St James' Terrace shall be subject to written agreement and approval from the Environment and Transportation Department. All works to the public road and the public realm to facilitate the development including pedestrian crossing, road and footpath modifications and signage shall be carried out at the applicant's expense at no cost to Dublin City Council and to the detailed requirements of the Environment and Transportation Department. All materials should be agreed in detail with Dublin City Council and should be in accordance with the document Construction Standards for Roads and Street Works in Dublin City Council.
7. Prior to the commencement of the development, the applicant should submit a drawing detailing any areas to be taken in charge in particular having regard to the Grand Canal Linear Park and the Grand Canal Greenway project.

8. All costs incurred by Dublin City Council, including any repairs to the public road and services necessary as a result of development, shall be at the expense of the developer.
9. The developer shall be obliged to comply with the requirements set out in the Code of Practice.

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On Behalf of Edel Kelly, Senior Transportation Officer