

## **TRANSPORTATION PLANNING DIVISION**

10<sup>th</sup> October 2022

**SHD REFERENCE:** SHD0019-22

**LOCATION:** North west corner of the Omni Park Shopping Centre, Santry and at Santry Hall Industrial Estate, Swords Road, Dublin 9 D09FX31 and D09HC84.

**PROPOSED:** 457 no. apartments and commercial space incl. retail/café/restaurants, crèche and community space

**FOR:** Serendale Limited

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### **TRANSPORTATION PLANNING DIVISION REPORT**

The proposed development comprises of the following:

- Demolition of Existing Buildings

A total of 457 no. residential units provided as follows:

- 1 no. studio apartments
- 221 no. 1 bed units
- 211 no. 2 bed units
- 24 no. 3 bed units

All provided within 4 no. blocks ranging from 4 to 12 stories in height

Provision of Car and Cycle Parking as follows:

- 213 no. car parking spaces for residential use located at basement level (inclusive of 11 no. accessible spaces and 22 no. EV charging points);
- 768 no. cycle spaces- 504 no. at basement and 264 no. at surface
- 7 no. motorcycle spaces

Reconfiguration of existing car parking with net reduction in 104no. spaces to provide for new public plaza and provision of 7 no. crèche drop off spaces and 6 no. car share spaces.

Additional Development including:

- 2 no. retail/café/restaurants totalling 430sq.m.
- Internal Residential amenity space of 604.9sq.m.
- 1 no. crèche of 226sq.m. (plus playground of 210sq.m.)
- 1 no. community space of 195.3sq.m
- Public realm improvements to include new access routes, amendments to existing carpark layout and a new public plaza integrating the proposed development with the existing district centre lands

Access is proposed via the existing Omni Park Shopping Centre entrance with service access from the Swords Road along the access road south of AIB, Swords Road, Santry.

## Planning History

The Planning History is noted. There is extensive planning history on the surrounding sites for recent SHD developments alongside planning applications pertaining to the Omni Park Shopping Centre

## Changes between SHD pre-application submission and current SHD application submission relevant to this Division

| Use   | Pre-Application Consultation  | Current Planning Application   | Increase/Decrease   |
|---|---|--|---|
| <b>Total No. Residential Units Proposed</b> | 468 no. residential units   | 457 no. residential units provided as follows:   | Decrease of 11 units  |
| <b>Typology</b>                             | 231 no. 1-bed units<br>213 no. 2-bed units<br>24 no. 3-bed units<br><br>All provided within 4 no. blocks ranging from 4 to 13 stories in height                     | 1 no. studio apartments<br>221 no. 1 bed units<br>211 no. 2 bed units<br>24 no. 3 bed units<br><br>All provided within 4 no. blocks ranging from 4 to 12 stories in height | Introduction of 1 no. studio apt<br><br>Decrease of 10 no. 1 bed units<br><br>Decrease of 2 no. 2 bed units |
| <b>Total No. Car Parking Spaces</b>         | 213 no. car parking spaces for residential use located at basement level;   | 213 no. car parking spaces for residential use located at basement level (inclusive of 11 no. accessible spaces and 22 no. EV charging points);                            | No changes  |
| <b>Total No. Bicycle Parking Spaces</b>     | 694 no. cycle spaces- 484 no. at basement and 210 no. at surface<br>5 no. motorcycle spaces   | 768 no. cycle spaces- 504 no. at basement and 264 no. at surface<br><br>7 no. motorcycle spaces  | Increase of 74 no. spaces overall<br>Increase of 2 no. motorcycle spaces                                    |
| <b>Other Uses</b>                           | 2no. retail/café/restaurants totalling 430sq.m.<br><br>Internal Residential amenity space of 599sq.m.<br><br>1 no. crèche of 226sq.m. (plus playground of 210sq.m.) | 2 no. retail/café/restaurants totalling 430sq.m.<br><br>Internal Residential amenity space of 604.9sq.m.<br><br>1 no. crèche of 226sq.m. (plus playground of 210sq.m.)     | Minor changes to the floor area of the residential amenity space and the community space.                   |

|  |                                  |                                    |  |
|--|----------------------------------|------------------------------------|--|
|  | 1 no. community space of 208sq.m | 1 no. community space of 195.3sq.m |  |
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### **Pre-Application Opinion**

An Bord Pleanála issued an Opinion in May 2022. Two main issues, required further consideration with a further 14. no. items requiring specific details. Issues raised relating to this division include:

*4. A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.*

*9. Submission of a Construction Management Plan.*

*11. A Traffic and Transport Assessment which addresses the concerns of the Transport Section in relation to the car parking management on the site having regard to the ratio proposed and the residential access into the wider Omniplex Park.*

### Issues Raised by Transportation Planning Division during Pre-Application Consultations

This division had a number of concerns relating to the proposed development based on the submission made for Pre-Application Consultation. These included:

1. Inconsistencies in reports regarding quantum of car parking provision
2. Pedestrian Connectivity
3. Car Parking Management
4. Cycle Parking Provision
5. Taking in charge

### **TPD Comments**

At the time of assessment by this division, the current 2016-2022 City Development Plan is in operation. At the time of writing, the draft 2022-2028 City Development Plan is due to be made in mid-November 2022, coming into effect on the 14<sup>th</sup> December 2022. A decision from ABP is due to issue on this planning application on the 15<sup>th</sup> December 2022<sup>1</sup>.

In that regard, this division is mindful of the requirements under the Draft City Development Plan and where applicable, will reference said standards.

### Inconsistencies in the Reports

Inconsistencies remain in the quantum of bicycle parking (including motorcycle parking) provided as outlined in the Planning Report, Application Form and Transportation Assessment.

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<sup>1</sup> Noted on [www.pleanala.ie](http://www.pleanala.ie) as of 10<sup>th</sup> October 2022

### Access

The subject site is located adjacent to the Omni Park Shopping Centre located to the south. There is an existing industrial unit on site, which is accessed off a private industrial road from the Swords Road. There is extensive redevelopment permitted and under construction in close proximity to the subject site, with large residential redevelopment sites located to the east adjacent to the Swords Road.

Vehicular access to the site is proposed via the existing shopping centre, which would access the basement parking serving the development. Primary pedestrian access would be provided along existing industrial estate road to the east, with additional pedestrian access provided to the south into an existing car park. It is proposed to reconfigure the existing car park to the south and provide footpaths along the length of the car park, past the existing Lidl/Marks and Spencer's retail units and connect to the former Queensway site (referred to as 'Omni Living' by the applicant) which has permission for a mixed use development. There is no designated cycle routes from the site and it is assumed that cyclists would use the pedestrian access routes also.

Concerns were expressed during the Pre-Application Opinion stage in relation to the isolated nature of the subject site relative to the availability of adequate pedestrian connectivity to the Swords Road and surrounding network. There was concern that the subject site was dependent on the adjacent 'Omni Living' development to the east to provide improved pedestrian connectivity to the Swords Road. Revised drawings have been included as part of the Transportation Assessment (TA) which outlines the improved pedestrian/cyclist connectivity through the site without the permitted schemes. This ensures that the development can be accessed independently and adequately should the development at 'Omni Living' not be forthcoming. Furthermore in the Stage 1 Road Safety Audit (submitted as part of the TA), issues were raised in relation to elements of the pedestrian connectivity through the site. These have been largely taken into consideration in the revised design. It has also been noted with this application that access through the adjoining Lidl/Marks and Spencer's service yard onto the internal road connecting to the Swords Road is for emergency vehicles only and will not be for pedestrian through access.

This division has no objections to the changes proposed.

### Transportation Assessment

A Transportation Assessment (TA) has been submitted with the application. Details around the trip generation associated with the various types of development has been submitted. A detailed assessment of the capacity of the existing shopping centre access has been carried out taking into consideration the proposed development and permitted developments. The TA concludes that there is negligible impact on the existing junction which it states has adequate capacity to serve the proposed development.

A Stage 1 Road Safety Audit has been included as Appendix I of the TA. The recommendations of the RSA have been addressed in the revised drawings.

A Bus Capacity/Demand Report has been provided as part of Appendix J of the TA and its contents noted.

### Car Parking

The application site is located within Area 3 as identified within Map J of the Dublin City Development Plan 2016-2022. Table 16.1 of the Development Plan permits a maximum of 1.5 no. car parking spaces per residential unit in Area 3. In the Draft Development Plan 2022-2028, the subject site would be located in Parking Area 2 where parking provision would be a maximum of 1 no. car parking space per residential unit.

The proposed development provides for 213 no. car parking spaces for residential use at basement level. It is also proposed to reconfigure of existing car parking with net reduction in 104 no. spaces to provide for new public plaza and provision of 7 no. crèche drop off spaces and 6 no. car share spaces. Concern was expressed at Pre-Application stage that the adjacent shopping centre were c. 1400 spaces of free car parking is provided would result in the development becoming largely car dependent as there appeared to be no disincentive to owning a car given the quantum of parking adjoining. It has been clarified in the TA that whilst parking in the shopping centre is free, it has an on-site management company that monitor the car park through the use of an Automated Number Plate Recognition (ANPR) system. This picks up the car number plates as they enter and exit the car park. It is stated that this allows duration of stay to be closely controlled, ensuring there is no inappropriate or long stay parking occurring. There are no car park barriers in place and it is not a ticketed car park but there is 24 hr security 365 days a year so management monitor occupancy, which clamp authorised vehicles where necessary. There are also clamping warning signs within the car park. This divisions welcomes the clarification regarding the adjoining car park.

It is noted in the Draft Development Plan 2022-2028 (Appendix 5) that all new developments are to be future proofed with EV charging with a minimum of 50% of all car parking spaces to be equipped with fully functional EV charging points. 22 no. spaces at basement level will be designated as EV charging spaces, with the remainder of spaces able to be upgraded should the demand arise following occupation; this equates to c. 10% of the overall parking provision.

#### Cycle Parking

768 no. cycle spaces are proposed to be provided with 504 no. spaces in the basement and 264 no. at surface level.

Having regard to the standards set out in the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (March 2018, as amended), 716 no. spaces would be required i.e. 1 per bed space as long stay spaces. Additional visitor spaces for crèche, retail/commercial units would also be required, however it is unclear from the submitted drawings where these spaces are to be located. 7 no. motorcycle spaces have been provided at basement level.

While the quantum of cycle parking is considered acceptable, there are concerns remaining about the quality of said spaces. There were concerns at Opinion stage about how cyclists will access the long term cycle parking at basement level. It has been noted that cyclists will access the bicycle parking via a dedicated cyclist ramp which is welcomed.

Concerns remain about some of the cycle parking provision within the basement. On the Proposed Basement Plan (Drawing Number OMN-JFA-ZZ-B)-DR-A-PB000 3), a number of the two –tiered bicycle racks remain located adjacent to car parking spaces and not in enclosed stores, may not operate effectively. As previously noted at Opinion Stage, to ensure use of more active modes, long term residential cycle parking should be provided within an enclosed area and not open in the basement car park. Consideration to the provision of bicycle cages should be explored to increase the sense of security for users. It has been stated that space for cargo and adapted bikes can be provided at basement or surface level but this has not been indicated on the submitted drawings. It is unclear overall how bicycle parking is going to be managed within the site.

The applicant is advocating a residential development based on the use of sustainable transport modes. However it is considered that these modes have not been adequately facilitated as part of this residential development, in particular with regards the bicycle parking provision. In the event of a grant of permission, this requires addressing.

### Servicing

The TA outlines the servicing requirements for the subject site with associated autotracking for refuse and emergency vehicles. It is stated that deliveries /services for the site can take place within the existing surface level car park to the south east with a negligible impact on traffic given the existing industrial use on site and the quantum of services and deliveries that already access the shopping centre. This is noted and accepted.

### Taking in Charge

It has been stated that the development will not be offered for taking in charge and will remain fully privately managed and maintained. This is noted and accepted.

## **Recommendation**

This division is broadly satisfied with the proposed development and acknowledges the changes since the Pre-Application Opinion. However there are elements of the proposed development that require addressing, in particular regarding bicycle parking provision. Should the Board be minded to grant permission, this division recommends the following conditions be applied:

### **Grant with Conditions**

1. Prior to the commencement of development, revised drawings shall be submitted regarding the bicycle parking provision for the overall development. Details shall be provided on the location, quantum and type of bicycle parking for long term residents, short stay visitors and the crèche and commercial users. Bicycle parking in the basement shall be revised to provide increased security measures for long term residents such as provision of bicycle cages or stores to the open bicycle parking spaces.
2.
  - (a) Prior to the occupation of the proposed development, an updated Mobility Management Strategy shall be submitted to the planning authority for written agreement. The strategy shall address the mobility requirements of future residents and shall promote the use of public transport, cycling and walking and the use of car club spaces. A mobility manager shall be appointed to oversee and co-ordinate the roll out of the strategy.
  - (b) The Mobility Management Strategy shall incorporate a Car Parking Management Strategy for the overall development, which shall address the management and assignment of car spaces to residents and uses over time. Car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements. Provision shall be made for a minimum of 6 no. spaces to be serviced by a car share provider.
  - (c) The Mobility Management Strategy shall incorporate a Bicycle Parking Management Strategy. Access to secure and sheltered bicycle parking spaces shall be provided for residents. Details around the allocation of bicycle parking areas for residents shall be provided, implementing restricted access to certain stores for each resident in order to provide additional security to users. Cycle parking stores/rooms shall be clearly numbered and labelled for ease of identification for users. Cycle parking shall be secure, conveniently located, sheltered and well lit. Key/fob access shall be required to bicycle stores. Cycle

parking design shall allow both wheel and frame to be locked. Cycle parking shall be in situ prior to the occupation of the proposed development.

3. Prior to commencement of development, and on appointment of a demolition contractor, a **Demolition Management Plan** shall be submitted to the planning authority for written agreement. This plan shall provide details of intended demolition practice for the development, including detailed traffic management, hours of working, noise and dust management measures and off-site disposal of demolition waste and access arrangements for labour, plant and materials, including location of plant and machine compound. The Demolition Traffic Management Plan shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport. The appointed contractor shall liaise with DCC Road Works Control Division during the demolition period.
4. Prior to commencement of development, and on appointment of a main contractor, a **Construction Management Plan** shall be submitted to the planning authority for written agreement. This plan shall provide details of intended construction practice for the development, including traffic management, hours of working, noise and dust management measures and off-site disposal of construction waste and access arrangements for labour, plant and materials, including location of plant and machine compound. The Construction Traffic Management Plan shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport. The appointed contractor shall liaise with DCC Road Works Control Division during construction period.
5. All car parking spaces shall be future proofed by the inclusion of ducting and / or cabling to permit the rapid future installation of Electric Vehicle (EV) charging point.
6. All costs incurred by Dublin City Council, including any repairs to the public road and services necessary as a result of the development, shall be at the expense of the developer.
7. The developer shall be obliged to comply with the requirements set out in the Code of Practice.

**Nicola Conlon, Senior Executive Planner**  
***On Behalf of Edel Kelly, Senior Transportation Officer***