

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

APPLICATION NUMBER	3308/20
PROPOSAL	The proposed development will consist of the construction of a 'Build to Rent' r
LOCATION	76, 76G & 280 Bannow Road, Cabra, Dublin 7
APPLICANT	Colin Daly, Nicola Daly and Andrew Haydon
DATE LODGED	03-Dec-2020
APPLICATION TYPE	Permission

The Roads Report is below

TRANSPORTATION PLANNING DIVISION

16th October 2020

LODGED PLAN NO:	3308/20	DATE LODGED:	3rd September 2020
LOCATION:	76, 76G & 280 Bannow Road, Cabra, Dublin 7		
PROPOSED:	Construction of 69 no. apartment units		
FOR:	Colin Daly, Nicola Daly and Andrew Haydon		

TRANSPORTATION PLANNING DIVISION REPORT

Proposed Development

The proposed development will consist of the construction of a 'Build to Rent' residential development comprising of **69 no. apartments (51 no. 1 beds, 18 no. 2 beds) in 2 no. blocks**, to be provided as follows:

- Block A – a four storey building containing a total of **20 no. apartments comprising of 3 no. 1 beds, 17 no. 2 beds** with balconies to north, south and east elevations with ancillary residential amenity facilities including concierge and residential lounge at ground level; Block B – a five storey building containing a total of **49 no. apartments comprising of 48 no. 1 beds, 1 no. 2 beds** with balconies to south elevations;
- A single level basement comprising a total of 33 no car parking spaces, 3 no. motorcycle spaces, 148 no. bicycle parking spaces (128 no. spaces at basement level and 20 no. spaces at ground floor level), ancillary plant room and refuse storage areas; along with a play/activity room, gym facility, utility room in support of the Build to Rent ancillary residential amenities and support facilities;
- Vehicular and pedestrian access will be onto Bannow Road.
- Construction of a basement level social and community centre/non-residential club (Class 10) unit for the relocation of the Cabra Pigeon Racing Club which will maintain its separate access from the eastern boundary of application site providing access onto Bannow Road;
- The double height retail unit located at 76 Bannow Road will be modified with a new roof structure, extension and modification to front elevation (south), modifications to north east and west elevations, signage and internal floor area and will be integrated into Block A of the development proposal;
- Landscaping, boundary treatment, drainage, signage, green roofs and solar pv panels to roof level of Blocks A and B, and all associated site and infrastructure works necessary to facilitate the development.

- The proposed development will also consist of the demolition of the existing two-storey building located at 280 Bannow Road (known as the Alma Hygiene building together with a kickboxing club) the demolition of the existing single storey warehouse unit and racing pigeon club unit at 76G Bannow Road (known as the Dublin Circus Centre and Cabra Racing Pigeon Club Building) and the demolition of all associated structures on site in order to facilitate the development. The subject site is bounded by Bannow Road to the south, 'The Coach House' and Hamilton Square to the west, Broombridge LUAS stop and maintenance depot to the north and a gated service laneway which provides separate access to Cabra Racing Pigeon Club's Clubhouse to the east.

Planning History

Previous site planning history noted. Most recent application onsite was Reg. Ref. 2895/19 /ABP-304945-19 which was refused by An Bord Pleanála. None of the reasons for refusal related to transportation and roads.

Submissions/Observations

Statutory Bodies

TII submission recommends the following conditions in the event of a grant:

- a) The proposed development is located in close proximity to a Luas Line; the applicant should ensure there is no adverse impact on Luas operation and safety. The development shall comply with TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system'.
- b) Prior to commencement of development, a demolition and/or construction method statement shall be submitted for the written agreement of the planning authority with written approval by TII. The method statement shall resolve all Luas interface issues and shall contain (i) identify all Luas alignment interfaces, (ii) contain a risk assessment for works associated with the interfaces, and (iii) mitigation measures for unacceptably high risks.
- c) Prior to commencement of development, a vibration and settlement monitoring regime for Luas track infrastructure shall be submitted for the written agreement of the planning authority with written approval by TII. This monitoring regime shall be undertaken strictly in accordance with TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' and shall contain inter alia the proposed regime operation and mitigation responses. The monitoring regime is required to ensure the track rail alignment remains within tolerance and shall be wholly carried out at the developer's expense.
- d) Site is within area adopted for S.49 Supplementary Development Contribution Scheme - Luas Cross City (St. Stephen's Green To Broombridge Line) and in the event that the application is granted and is not exempt, the Section 49 Luas Line Levy should be applied.

Iarnród Éireann Infrastructure submissions raises the following observations:

- a) The Railway Safety Act 2005 places an obligation on all persons carrying out any works on or near the railway to ensure that there is no increase in risk to the railway as a consequence of these works. Because of the proximity of the site to the Railway, the Developer must take into account this obligation in Design, Construction and Operation of the scheme.
- b) The applicant should be made aware of the normal vibrations and noise emanating from railway operations and maintenance. These developments including the boundary treatment should be so designed to withstand such vibrations and noise. Applicants in this regard should be aware that the railway has the capacity to operate 24 hours a day, 7 days a week.
- c) For development of residential units in areas adjoining the railway corridor, The Applicant and / or his agents should conduct quantified noise assessment to ensure noise levels at the proposed residential units do not equal or exceed undesirable noise levels, as specified in the Local

Authority's Noise Action Plan. It shall be responsibility of The Applicant and / or his agent to specify necessary mitigation measures where specified noise levels are exceeded. The noise assessment should consider a number of scenarios when predicting noise levels, including the following:

- within development with windows closed;
 - within development with open windows; and
 - exterior of development within private or communal gardens.
- d) Given that the railway is maintained and operated 24 hours a day 7 days a week, the Developer should be required, via sales literature, to inform the future purchasers and/or tenants where applicable of residential units within the development of the noise and vibration that might be expected due to such railway operations and maintenance.

Third Party Submissions/Observations

Third party submissions were received within the statutory timeframe. The issues raised relating to this Division includes the following:

- Insufficient parking within development;
- Existing issues on Bannow Road with illegal parking;
- Low parking levels within development will exacerbate existing parking congestion issues on Bannow Road;
- Existing parking issues on road resulting from Luas and businesses on Bannow Road;
- New development will exacerbate traffic congestion on Bannow Road;

The submissions have been read and their content noted.

TPD Comments

As set out above, planning permission is sought for the construction of a new apartment development (Build to Rent) comprising of 69 no. apartments (51 no. 1 beds, 18 no. 2 beds). The development contains a total of 87 no. bedrooms and 174 no. bed spaces. Approximately 74% of all units are 1-bed unit. The scheme includes a single level basement comprising a total of 33 no car parking spaces, 3 no. motorcycle spaces, 148 no. bicycle parking spaces (128 no. spaces at basement level and 20 no. spaces at ground floor level), ancillary plant room and refuse storage areas; along with a play/activity room, gym facility, utility room in support of the Build to Rent ancillary residential amenities. The site is bounded by Bannow Road to the south, 'The Coach House' and Hamilton Square to the west, Broombridge Luas Stop and depot and maintenance depot to the north and a gated service laneway which provides separate access to Cabra Racing Pigeon Club's Clubhouse to the east. Presently, there are 2 no. warehouse/industrial buildings on-site and 1 no. small retail unit, with a total of 3 no. vehicular entrances from the Bannow Road.

Accessibility and Parking

Bannow Road is a single carriageway road traversing in an east/west direction, providing connectivity between Faussagh Road and Broombridge Road, and surrounding residential and commercial areas. Parking is largely uncontrolled along Bannow Road. The site is well served by a range of public transport options, being within 400 metres walking distance of both Broombridge Luas stop and Broombridge Railway station. Dublin Bus service route No.40e and No.120 are within 300 metres walking distances of the site, while service route No.122 is 700 metres walking distance in Faussagh Avenue.

The pedestrian and vehicular entrances to the site are all located to the south of the site, via Bannow Road. The vehicular entrance to the basement level car park is located at the southwest corner of the site, adjacent to the site boundary with 'The Coach House'. There are two pedestrian entrances to the residential blocks, one of which leads directly into Block A and a second which will act as a shared entrance for emergency service fire vehicles at ground floor level. A third pedestrian entrances will be provided for access to the retail unit only.

The site is located in Area 2 of Map J of the Dublin City Development Plan 2016–2022. Table 16.1 of the Development Plan sets out maximum car parking standards for residential units in this area as 1 parking space per dwelling, equating to a maximum quantum of 69 no. spaces. A total of 33 no. car parking spaces are proposed as part of this scheme, equating to the parking ratio of 0.47 per unit. Notwithstanding the rationale provided in the Traffic and Transport Assessment (TTA), this division has concerns with regard the potential impact of overspill parking on the surrounding road network, as raised in a number of third

party objection letters. While this Division will consider a reduced parking quantum on new BTR residential developments in close proximity to high public transport corridors, the applicant must demonstrate that a robust parking management strategy and mobility management plan will be implemented to support the scheme, future residents and existing local residents, and ensure no future parking overspill arises onto surrounding road networks.

The TTA includes information on traffic generation including TRICS data. The findings state no significant increase in traffic generation arising from the development based on the proposed parking quantum. The applicant has not submitted a Parking Strategy or a resident Mobility Management Plan. This should be requested. Having regard to the lower parking ratio, the applicant should propose additional measures/services that will support residents within the development and encourage alternative transport modes. The TTA outlines the locations of existing GoCar vehicles in the vicinity however the applicant should investigate the incorporation of an additional GoCar vehicle location in proximity of the site to support the scheme. Furthermore, the applicant should consider other mobility services that can contribute to facilitate resident's travel, like a resident cargo/e-cargo bike sharing service that would assist in childcare drop-off/collections and grocery shopping, as well as additional recreation use by residents.

It is noted that there is a discrepancy between the Planning Statement Report and the Traffic and Transport Assessment in relation to the quantum of designated disabled parking bays proposed. For clarity, the quantum should comply with the Development Plan standards requirement that at least 5% of the total number of spaces should be designated car-parking spaces. Based on the current proposed quantum, a minimum of 2 no. disabled parking bays should be provided to meet Development Plan standards, as demonstrated in Drawing No. PL-100.

The development incorporates a dedicated non-residential space for the relocation of the Cabra Pigeon Racing Club (CPRC), which is proposed at the northeast corner of the site, at Basement level. The CPRC will maintain a separate access from the eastern boundary of the site. It is unclear what parking provision arrangements and demands are for the proposed club and if members will avail of the basement level car park. The applicant should also be requested to address the parking and servicing demands associated with the retail unit at the southeast corner.

The Parking Strategy should be submitted outlining how residential parking will be allocated and managed onsite and measures to ensure that overspill parking does not occur on surrounding street networks. The Strategy should also address the parking/set down demands associated with the proposed retail unit and CPRC. A Swept path analysis should be submitted showing vehicles entering and egressing the site and vehicles turning at the base of the ramp at basement level. The entrance gate to the basement should be set back so as vehicles entering will clear the public footpath and not obstruct pedestrian movement and the vehicle stop line should be set back to provide for pedestrian priority.

Cycle Parking

148 no. bicycle parking spaces are proposed as part of the development, of which 128 no. spaces are located at basement level and 20 no. spaces at ground floor level. The standard as per Table 16.2 of the Dublin City Development Plan 2016-2022 is 1 no. cycle parking space per unit. The 2018 Design Standards for New Apartments guidelines sets out a standard of 1 no. cycle parking space per bedroom and 1 no. visitor cycle space per 2 no. units, which in this scheme would equate to 87 no. residential cycle spaces and 34 no. visitor cycle spaces. As such the proposed quantum is compliant with the DCC Development Plan standards and the 2018 Design Standards for New Apartments guidelines. The Traffic and Transport Assessment states that bicycle parking will be secure parking will be provided at basement level adjacent to the main entrances. The applicant is requested to provide cycle parking details including type of stands proposed and security measures at basement level and confirm if cyclists/vehicles will share the basement access ramp and measures to ensure safety of all users.

Servicing

It is unclear if all servicing and delivery vehicles will enter the site regularly and if so the applicant should clarify if this is via the pedestrian/fire truck entrance. The applicant should provide elevation details of the entrance gate/barrier/bollards particularly if this is to be regularly used as a pedestrian route. The applicant is requested to submit a Servicing and Operations Management Plan to include details of refuse collections.

Construction Management

No Construction Management Plan (CMP) has been submitted. In the event of a grant, the applicant will be required to agree in writing a CMP with Dublin City Council and TII prior to commencement of any works onsite.

Taken in Charge

The applicant is requested to outline lands, if any, that are proposed to be taken in charge. In addition, the applicant is advised that any parking on roads to be taken in charge are considered public spaces and therefore cannot be assigned to any specific function to serve a development, unless this is assigned by DCC once in charge.

Recommendations

It is recommended that **Further Information** be requested from the applicant with regard to the following:

1. Consideration may be given to a reduced parking quantum in close proximity to high public transport corridors; however, there are concerns regarding the potential for parking overspill from the development onto adjoining street network. A reduced parking quantum in a residential scheme must be reinforced by pro-active residential travel planning, supported by a Parking Management Strategy and Mobility Management Plan. The applicant is requested to:
 - a) Submit a Parking Management Strategy, which includes details on how car parking spaces will be assigned to residents and continually managed over a long-term period; and, how parking overspill from the development onto surrounding streets will be avoided.
 - b) Submit a Mobility Management Plan. The plan should include additional measures and/or services that will support residents within the development and encourage alternative transport modes and that would support a reduced parking provision onsite. The applicant is advised to investigate the incorporation of an additional GoCar vehicle location in proximity of the site to support the scheme, and consider other mobility services that can contribute to facilitate resident's travel, like a resident cargo/e-cargo bike sharing service.
2. The applicant is requested to provide details on the parking and servicing demands associated with the retail unit at the southeast corner and the Cabra Pigeon Racing Club and address parking and delivery arrangements.
3. The applicant is requested to submit a Servicing Operation Plan to include details of refuse collections.
4. The applicant is requested to address the following:
 - a) Submit a Swept path analysis showing vehicles entering and egressing the site and vehicles turning at the base of the ramp at basement level.
 - b) Submit revised layout plans showing the basement level vehicular entrance gate is sufficiently set back so as vehicles entering will clear the public footpath and not obstruct pedestrian movement.
 - c) Submit revised layout plans showing the set back of the vehicle stop line to provide for pedestrian priority.
 - d) Submit details of the cycle parking area including type of stands and security measures proposed.

- e) Confirm if cyclists/vehicles will share the basement access ramp and measures to ensure safety of all users of the entrance ramp.
- f) Provide elevation details of the pedestrian/fire truck entrance and access arrangements and confirm if an entrance gate, barrier or retractable bollards will be in place.

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