

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

APPLICATION NUMBER	3228/20
PROPOSAL	10-year permission for a mixed use including part Build to rent development.
LOCATION	Site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road
APPLICANT	O'Flynn Construction Co. Unlimited Company
DATE LODGED	17-Dec-2020
APPLICATION TYPE	Permission

The Roads Report is below

TRANSPORTATION PLANNING DIVISION

9th October 2020

LODGED PLAN NO:	3228/20
DATE LODGED:	21st August 2020
LOCATION:	Site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road
PROPOSED:	Mixed use
FOR:	O'Flynn Construction Co. Unlimited Company

TRANSPORTATION PLANNING DIVISION REPORT

Proposed Development

The proposed development comprises of a mixed use including part Build to Rent development in 13 no. blocks (Blocks A-L) ranging in height from 4-15 storeys over 3 no. basements with a cumulative gross floor area of 168,184.13 sq.m at this 6.921 hectare site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road. The application area includes part of the 'Nissan Site' (6.429 hectares) and 0.492 hectares to accommodate works to facilitate connections to municipal services and works proposed to public roads.

In summary, the development will consist of demolition of existing structures and removal of 38kV infrastructure; construction of 3 no. basements (37,240.54 m²) incorporating parking, plant, waste management facilities, a 148 bedroom hotel (7,415.0 m² in Block A); 1,137 no. residential units (across 12 no. blocks (B-L) that range in height from 4-10 storeys) and associated tenant facilities (combined 2,948.90 sq.m GFA) and communal amenity space; public open spaces; 10 no. retail units (2,621.85 m² in Block B, C, D and E); office accommodation (5,001.80 m² in Blocks B, C and E); a primary healthcare Centre (994.30 m² in Block C); Childcare facility (968.95 m² in Block D); Cultural Hub (486.60 m² in Block B); Gymnasium (210.9 m² in Block B); 853 no. car parking spaces; 2,514 cycle parking spaces; 34 motor cycle spaces; car and cycle parking; 11 no. ESB substations and LV rooms (358.75 m²) and works to the Inchicore Ballymount 38kV line (including undergrounding a section); roof mounted solar photovoltaic panels; and all ancillary site development works, drainage, plant, waste storage, boundary treatment and lighting. Road upgrade works to Walkinstown Avenue to facilitate improved vehicular, cycle and pedestrian access and including a loading bay (3.2m wide by 30m long) to facilitate deliveries.

Residential units distributed per block as follows:

- Block B: 20 no. studio apartments, 48 no. 1-bedroom (2 person) units, 135 no. 2-bedroom (4 person) units and 16 no. 3-bedroom (5 person) units.
- Block C - BTR: 42 no. studio apartments, 67 no. 1-bedroom (2 person) units and 54 no. 2-bedroom (4 person) units.
- Block D: 6 no. studio apartments, 59 no. 1-bedroom (2 person) units, 34 no. 2-bedroom (4 person) units and 7 no. 3-bedroom (5 person) units;
- Block E: 7 no. studio apartments, 18 no. 1-bedroom (2 person) units, 36 no. 2-bedroom (4 person) units and 11 no. 3-bedroom (5 person) units;
- Block F: 7 no. 1-bedroom (2 person) units, 25 no. 2-bedroom (4 person) units and 7 no. 3-bedroom (5 person) units;
- Block G: 8 no. studio apartments, 32 no. 1-bedroom (2 person) units and 14 no. 2-bedroom (4 person) units
- Block H1: 6 no. 1-bedroom (2 person) units and 12 no. 2-bedroom (4 person) units;
- Block H2: 8 no. studio apartments, 32 no. 1-bedroom (2 person) units, 24 no. 2-bedroom (4 person) units and 7 no. 3-bedroom (5 person) units;
- Block I: 17 no. studio apartments, 31 no. 1-bedroom (2 person) units and 73 no. 2-bedroom (4 person) units;
- Block J: 61 no. 2-bedroom (4 person) units and 14 no. 3-bedroom (5 person) units
- Block K: 13 no. studio apartments, 21 no. 1-bedroom (2 person) units, 16 no. 2-bedroom (4 person) units and 13 no. 3-bedroom (5 person) units
- Block L - BTR: 25 no. studio apartments, 49 no. 1-bedroom (2 person) units, 56 no. 2-bedroom (4 person) units and 6 no. 3-bedroom (5 person) units

Submissions

National Transport Authority

Comments by the NTA are summarised as follows:

- The NTA notes an emerging cluster of intense mixed use development within the area and importance of design context having regard to other proposed development. NTA notes that a Masterplan should be agreed for the application site and the area to the west of Walkinstown Avenue in order to address access proposals, including access to bus and Luas, overall quantum and mix of development in advance of the progression of any planning applications.
- The pre-CBC approach to Walkinstown Avenue is not satisfactory for the following reasons:
 - The proposed left-turn pocket requires to be removed as it would cause conflict between general traffic and north-south bus and cycle movements;
 - The maintenance of an advisory cycle lane is sub-optimal; and
 - The interim proposal to expand the capacity of Walkinstown Avenue for general traffic would induce additional trips onto the route and may compromise the potential to implement the CBC in the longer-term.
- The NTA therefore recommends that a “long-term with CBC” proposal is implemented in tandem with the proposed development.
- Concerns with regard to the proposed HGV set down area on the east side of Walkinstown Avenue and recommends that alternative locations for delivery, including within the site, are explored.
- In general supports the applicant’s approach to car parking, but recommends that the balance between car parking spaces allocated to individual units and those allocated to car-sharing is revisited with a view to reducing the overall level of residential car parking further.

- Concerns regarding potential through traffic of the site to avoid the Naas Road / Walkinstown Avenue junction. The NTA recommends that, in the event of a grant of permission, a condition is attached which requires filtered permeability measures to be put in place which would prevent motorised traffic from travelling through the proposed development.

The NTA would be satisfied that the proposed development would be consistent with the principles of land use and transport integration as set out in the Transport Strategy, if the following recommendations are incorporated:

1. Liaison with the NTA on the location and design of bus stops on Walkinstown Avenue;
2. The implementation of a long-term design for Walkinstown Avenue in tandem with the proposed development and in agreement with the NTA;
3. Examination of an alternative location for HGV set down;
4. Review of a potential reduction in quantum of residential car parking; and
5. Introduction of filtered permeability measures.

Transport Infrastructure Ireland

TII recommends a number of conditions to safeguard Luas infrastructure, operation and safety and states that the development shall comply with TII's "Code of engineering practice for works on, near, or adjacent the Luas light rail system".

In relation to proposed pedestrian crossings, the TII notes that a new pedestrian crossing at across Walkinstown Avenue (R112) appears to form part of the current application but that for the eastern side of the junction across Naas Road does not, despite being indicated on drawings submitted with the application e.g. on drawing entitled Proposed Road Markings & Signage Sht 2-of-4, by Donnachadh O'Brien & Assoc., drawing no. NWLMUD-DCB-XX-SI-DR_C-0601, Rev. NO. 7, Dec '19.

- Therefore, for safe access to Luas, TII recommend that the pedestrian crossing of the Naas Road to the east of the Naas Road (R810) and Kylemore Road / Walkinstown Avenue (R112) junction be required to be implemented as part of phase 2 of the this development having regard to drawing entitled Masterplan Phasing, by Reddy Architecture + Urbanism, Drawing No. NWLMUD-RAU-ZZ-ZZ-DR-A90.1102, Rev. P02.01. submitted with the application.

Observations

Third party observations on file note the following concerns of relevance to this division:

- Review the proposed access arrangements to the site from Walkinstown Avenue and request revisions to the entrance point to the scheme in line with the Naas Road Local Area Plan 2012. Have regard to the wider site strategy for access, permeability and linkages with the MDL site to the west.
- East-west green link and cycle links
- Impact on Long Mile Road junction
- Existing traffic congestion, additional traffic will cause gridlock
- Public transport in the Luas is inadequate and there is insufficient capacity.
- Accumulated effect on infrastructure from all the planned developments in the area.
- A phased release development in line with provision of the infrastructural requirements
- Technical comments on the TIA relating to growth factor and modelling.
- Cumulative assessment should take account of additional traffic arising from the proposed development of the MDL site to the west of Walkinstown Avenue.

TPD Comments

Location

The site is bounded by Naas Road to the north, approximate 200 m street frontage and Walkinstown Avenue to the west, approximate 210 m street frontage. The site measures 6.9 ha.

The applicant owns lands directly to the south, situated at the Walkinstown Avenue and Long Mile Road junction and whilst not part of this application, it is noted that commercial and retail use is planned for this site. The site abuts the Concord site to the north-east (ABP-304686-19), the Royal Liver site (4238/19) is located across Naas Road to the north and the MDL site is located across Walkinstown Avenue to the west. Finches Business Park is located to the south east and Drimnagh Castle lands are located to the east.

It is noted that the NTA has recommended that a masterplan exercise for development proposals to the east (Nissan site) and west (MDL site) of Walkinstown Avenue and that this should be carried out in advance of any planning application. This division would welcome an overarching/collaborative approach for the two sites in particular, in regards to transport matters having regard to the scale of developments, the capacity of junctions, access to and impact on public transport and the cumulative impact of development already granted planning permission within the area. It is however, recognised that the two sites are separate and with different developer interests.

Public Transport including BusConnects

The Kylemore Luas stop on Naas Road is located adjacent to the site. There are bus stops adjacent to the site along Naas Rd, Walkinstown Ave and Long Mile Rd. It is noted that there are 7 bus routes operating along these corridors including one frequency bus route, No. 13 Harristown and Grange Castle, via Dublin City Centre. There are existing bus lanes along Naas Road and Long Mile Road and there is cycle lane provision along Long Mile Road.

Walkinstown Avenue forms part of the proposed Clondalkin-Drimnagh Core Bus Corridor (CBC). Walkinstown Avenue is currently served by route number 18 with 5 services in the peak hour. Under BusConnects, it will be served by the D1, D3 and S4 with approximately 14 services in the peak hour.

The NTA has confirmed that they would be satisfied that the requirements of the CBC project in terms of bus priority can be accommodated by the proposed development. Although, as noted above the NTA has raised concerns regarding the interim design and its potential impact on the CBC proposals and requested that the long-term CBC option is progressed in tandem with the proposed development. The NTA has requested that the applicant liaise with the NTA in relation to the location and design of the bus stops on Walkinstown Avenue.

Access Proposals

Access - Walkinstown Avenue

The applicant has submitted a number of layouts for Walkinstown Avenue as follows:

- short-term works to Walkinstown Avenue (prior to CBC implemented) NWLMUD-DOB-XX-SI-DR-C-0513
- short-term works to Walkinstown Avenue (CBC implemented) NWLMUD-DOB-XX-SI-DR-C-0511
- long-term works to Walkinstown Avenue future controlled junction prior to CBC implemented NWLMUD-DOB-XX-SI-DR-C-0513
- long-term works to Walkinstown Avenue future controlled junction with CBC implemented NWLMUD-DOB-XX-SI-DR-C-5511

Walkinstown Avenue is a 4-lane carriageway between the junction between Naas Road and Long Mile Road. There is no existing bus lane and cycle lane provision. There is existing signalised pedestrian

crossing at the Long Mile Road junction, but not at the Naas Road junction. There are three existing vehicular access points off Walkinstown Avenue. As noted above, the road forms part of the CBC and significant changes are proposed as part of this.

A priority junction, a left-in and left-out, on Walkinstown Avenue is proposed directly across from the existing access serving the MDL site. The location of the junction is in principle acceptable to this division. The left-in and left-out arrangements reduce potential conflicts with north bound traffic on Walkinstown Avenue. The priority junction is noted as an interim solution which could be developed to a future four-arm junction facilitating access to both sides of Walkinstown Avenue. The provision of a four-arm junction would rely on third party lands to the west of Walkinstown Avenue. It should be noted that for Walkinstown Avenue, this division and the NTA have outlined that vehicular access serving future developments should be facilitated by one four-arm junction. Several vehicular access points would not be supported.

The proposed junction is located further south than the indicative access location shown in the Naas Road LAP. The indicative access alignment within the LAP is closer to the Naas Road junction and the Luas. The location of the proposed junction provides increased distance to the Naas Road corridor, facilitates relocation of CBC bus stops and maintains an acceptable distance to the Long Mile Road junction. The proposed junction location does not alter the north-south connectivity for cyclists and pedestrians. A further two pedestrian access points are proposed along Walkinstown Avenue. A potential east-west link would be facilitated by the provision of a future four-arm junction on Walkinstown Avenue and the proposed location is considered acceptable to facilitate this link. A toucan crossing further north on Walkinstown Avenue is proposed and which will facilitate improved access to bus stops and additional east-west connection. It is noted that this location does not provide a direct link to internal streets within the proposed development due to proposed block pattern. Pedestrian connections would also be provided at the main junctions with Naas Road and Long Mile Road. Both junctions are to be upgraded as part of the CBC proposals. The proposed developed includes for a signalised pedestrian crossing of Walkinstown Avenue at the junction with Naas Road. Of note, this crossing also forms part of the Royal Live site, planning application reg.ref. 4238/19. The provision of improved signalised pedestrian crossing is flagged in the submitted Quality Audit.

It is proposed to widen Walkinstown Avenue at the junction to facilitated proposed access arrangements, both interim and long-term. The NTA has raised concerns regarding the extended carriageway design for the interim solutions with or without the CBC, and in particular notes the increase in car capacity. The NTA has further noted that an interim solution to expand the capacity of Walkinstown Avenue for cars could comprise the potential to implement the CBC in the future. The NTA has recommended that the left-turn pocket is removed due to conflict with general traffic and buses and cyclists. Furthermore, the left-turn pocket does not align with the CBC proposals and would subsequently have to be removed. The proposed development should facilitate the implementation of the CBC. A number of concerns relating to the interim Walkinstown Avenue junction has been flagged in the submitted Quality Audit, in relation to pedestrian movements, cyclist access, vehicular right turn etc. There appears to be no design response to these within the submission.

The cycle access arrangements at the proposed priority junction are not clear. A cycle lane is proposed on the east side of Walkinstown Avenue as part of the interim works. This appears to align with the CBC proposals, however concerns have been raised by the proposed left-turn pocket in regards to this. A section of advisory cycle lane is proposed north bound for the interim solution. Safety concerns has been raised in relation to this.

It is noted that an additional south bound lane is proposed to the junction with Long Mile Road along with reconfiguration of the existing left slip as part of the interim solution. This left slip is removed as part of the CBC proposals. The preference of this division would be for the left slip to be removed as part of the interim solution and the applicant shall review how this movement can be facilitated within the junction.

A relocation of the south bound bus stop is noted. The applicant shall review the potential location for bus stops along Walkinstown Avenue in consultation with the NTA.

A loading bay (3.2 m wide by 30 m long) is proposed on Walkinstown Avenue. The provision of a loading bay on Walkinstown Avenue and potential conflict with buses and cyclists and overspill parking has been raised by the NTA. In this regard, the loading bay should be omitted and the applicant is requested to review service arrangement for the proposed development and facilitate such within the site.

A number of concerns have been raised in regards to the interim solution, and whilst some of the can be addressed through revised design. The preference is for the applicant to liaise with the NTA and DCC in order for the proposed development to be progressed in tandem with the CBC proposals. DCC would welcome this approach having regard to the scale of the development and concerns relating to the interim design solutions. The applicant is requested to review with the NTA and DCC the option to progress the long-term CBC solution for Walkinstown Avenue.

Access - Naas Road

A secondary vehicular access in the form of a priority junction, left-in and left-out, is proposed onto the west bound carriageway of Naas Road. There are bus lanes on Naas Road but no cycle lane provision. Sightlines are acceptable. It is noted from the submitted Quality Audit that a yellow hatch box should be incorporated to facilitate egress having regard to the bus lane. The proposed junction is located west of the existing substation access and appears to integrate the existing access within the proposed development junction. The applicant should clarify if the existing access arrangement to the substation is to be integrated with the access to the proposed development.

The location of the Naas Road junction is acceptable. The width of the junction appears excessive and does not facilitate pedestrian movement. The applicant is requested to review the design of the junction. The applicant should also review the option to facilitate cycle access via this junction.

There are two pedestrian access points proposed on Naas Road. Whilst the increased pedestrian permeability is welcome, it is recommended that a more targeted pedestrian access arrangement is promoted which directs pedestrians within the site towards the junction with Walkinstown Road and the signalised crossings towards the eastern access points.

The pedestrian crossing of Naas Road, east of the junction with Walkinstown Avenue, does not form part of the proposed development and is referenced on submitted drawing no. NWLMUD-DOB-XX-SI-DR-C-0513 as forming part of the Royal Liver planning application reg. ref. 4238/19. This pedestrian crossing is noted in TII's response.

There is a concern that the Naas Road junction will facilitate vehicular access south of the proposed development, allowing for traffic to bypass the Naas Road junction. This concern has also been flagged by the NTA. It is noted that this has also been raised in the submitted Quality Audit, however the response in terms of how this has been addressed in the design of the proposed development is not considered adequate having regard to junction capacity assessments. The applicant is requested to review the potential for through traffic and incorporate filtered permeability measures which would prevent vehicular access through the site.

Access – Internal

A mix of arterial streets and shared streets design are proposed within the proposed development. The applicant shall review the internal street layout having regard to the through traffic concerns associated with the Naas Road junction.

Footpath provision is generally acceptable, but pedestrian priority crossings should be provided for all internal road junctions. Cycle lanes provision is noted for a limited section along the main arterial route. The design of this is not clear having regard to the junction with Walkinstown Avenue and the transition into shared surface within the internal street layout. It is noted that cyclists are otherwise to share the carriageway. The applicant shall review cycle access from Walkinstown Avenue and within the proposed development.

As noted previously pedestrian links to the Naas Road should be reduced and a more targeted approach should be pursued, focusing pedestrian movement within the site towards the Naas Road junctions. Footpath provision within the site along the northern boundary adjacent to Block A should be reviewed.

The two pedestrian links to the Concord site to the north-east are noted and welcome. Provision of links to the playing fields to the east should be clarified.

Access – Servicing

As noted above, there are concerns regarding the loading bay on Walkinstown Avenue. It is noted from the submitted swept path analysis that with exception of articulated trucks, all servicing can be fully accommodated within the site. The requirements for articulated trucks to facilitate service requirements are not evident from the proposed mix of use and GFL proposed per use. The applicant is requested to clarify service access requirements and review options to fully facilitate this within the site. There appear to be no drop-off/loading bays within the proposed development. Regard should be had to the concerns raised in the submitted Quality Audit in this regard.

Three emergency vehicular accesses are noted via both vehicular junctions and the two pedestrian accesses off Walkinstown Avenue.

The submitted Operational Waste Management Plan notes that WSA are provided in the basement for all blocks except Block D where it is located at ground floor level. The hotel use will have a WSA at basement level Block A, whilst all other non-residential uses will have communal WSAs located at basement except Block D where it is located at ground floor level. It further states that each WSA has an allocated collection point at ground floor level for temporary storage on collection days.

Areas to be taken in charge

No internal roads are proposed to be taken in charge.

The extent of revised public footpath provision along Walkinstown Avenue should be clarified, and clarity on what is to be taken in charge.

Public footpath provision along Naas Road should be increased in width.

Public footpath provision on at the north-west corner by the Naas Road should be increased to facilitate the footfall from the proposed development. The applicant is requested to revise landscape proposals to accommodate this.

Comments on the proposed junctions on Walkinstown Avenue and Naas Road should be noted in regards to proposed areas to be taken in charge.

Environmental Impact Assessment Report and Traffic Impact Assessment

An Environmental Impact Assessment Report (EIAR) has been submitted with the application. A Traffic Impact Assessment (TIA) has also been submitted. This division offers the following comments:

ElAR Chapter 2 Development Description: A 4 phase construction programme for the development over a timeframe of 97 months, each phase lasting approximately 19 months is proposed. The applicant should be requested to clarify the anticipated start date of construction and the operational timeframe for the development to allow clarity on the phasing of the development and whether there are proposed construction phase and operational phase overlaps. Having regard to this, the applicant should review and update, if required, the cumulative assessment scope of the ElAR in relation to the potential for combined construction and operational effects of the proposed development and assess the construction impact on operational phases, and associated sensitive receptors, where the two stages overlap. Applicable technical chapters within the ElAR should be updated to reflect any changes to the construction and operational timeframes. This may also inform the sensitive receptors assessment.

If there is an overlap of construction and operational phases, the applicant is requested to clarify the combined access arrangements for the site in regards to Walkinstown Avenue and Naas Road.

ElAR Chapter 6 Traffic and Transport: The applicant should review the assessment having regard to the clarification sought in relation to Chapter 2 above. This division considers the scope of the traffic surveys acceptable. Whilst the assessment scope is generally acceptable, this is likely to have to be revised following the review of the development description as per Chapter 2 above. The assessment should be updated to reflect the revised development description in regards to construction and operational timeframes. The cumulative scope is considered acceptable and it is noted that it also includes Phase 5 of the masterplan area. Whilst the references to MDL site across the road is noted, this is not subject to a planning application.

Section 6.9.1 notes that reduced car parking provision is an incorporated design mitigation, although it does not appear to have informed the trip generation assessment which is based on the TRICS database.

Section 6.9.3 whilst reference to MMP is noted, a car parking strategy at both basement and surface level and overall management of the site would be a key operational phase mitigation measures. As noted above, this division is concerned with how surface car parking will be managed and how the potential for overspill parking within the site will be managed.

Section 6.8.2 and Section 6.9.3 references that the baseline scenario indicates that upgrades works are already required to the Naas Road and Long Mile Road junction and where upgrading works to take place then these would be significantly less. It is not clear from the submission what work is envisaged. Furthermore the assessment provided within the TIA reviews the impact on the junctions following the implementation of the CBC which includes upgrades to the junction and increased capacity issues are proposed.

Section 6.8.2 concludes a significant medium-term adverse impact on the operational efficiency of the Naas Road and the Long Mile road junction. It is noted that this impact is disproportionate to the actual vehicular traffic generation predicted for the proposed development due to the pre-existing oversaturated condition of the junctions.

The applicant shall review the TIA in regards to modelling carried out for options with CBC in relation to junction configurations. The existing slips appears to be included as part of the CBC modelling.

Parking, Management and Mobility

Cycle Parking Provision

2,514 no. bicycle parking spaces comprising 1,839 no. long-term bicycle storage spaces for residents, 569 no. short-term bicycle parking spaces for apartment visitors and 106 no. short-term bicycle parking spaces to serve the non-residential elements of the development are proposed. The submitted Mobility Management Plan (MPP) sets a modal split target of 105 for both residents and staff. An overview of applicable standards and proposed provision is outlined below.

Use	Table 16.2 (Minima)	New Apartment Guidelines	Standards		Proposed
Residential (1137 units ¹)	1/unit ²	1/bedroom	1137	1,839	1839
Residential visitors	10%*	1/2 units	114*	569	569
<i>Sub-total</i>			<i>1251</i>	<i>2408</i>	
Hotel (148)		1/12 bedroom		13	106
Offices (5,002 m ²)		1/100 m ²		51	

Retail (2,622 m2)	1/150 m2	18		
Clinics (12 rooms/994 m2)	1 / 2 consulting room	5		
Crèche (4 rooms/142 children/969 m2)	-	-		
Total		1338	2495	2,514

¹⁵¹⁶ no. studio/1-bedroom units, 540 no. 2-bedroom units, 81 no. 3-bedroom units.

² Additional requirements for larger units and visitor parking will be decided on a case by case basis.

With the exception of 951 no. residential spaces to be located in internal bike stores, cycle parking spaces are located externally. Internal bicycle parking for residents is provided at ground floor level in Block B, C, D, E and K. The location of the internal cycle stores are acceptable. It is however, not clear from the submitted, what quantum of stands are proposed within each store and if each store caters for the full long-term cycle provision associated with each block.

A number of bike stores are noted predominately along the southern and eastern perimeters, however limited details have been provided. A number of bike stores, totaling 881 no. resident spaces, are located remote from the residential blocks and with limited surveillance. Visitor cycle parking is provided along the western and northern site boundaries, adjacent to the southern access road and in various locations adjacent to the blocks. A large proportion of visitor cycle parking spaces are located at the periphery with limited link to the proposed uses and are afforded limited security and surveillance. It is not clear from the submitted if secure and sheltered cycle parking for staff associated with all uses are to be located. The submitted MMP notes the importance of access to secure and sheltered cycle parking provision for staff in order to facilitate an active mode split.

Cargo bike parking facilities should also be provided.

Overall the proposed quantum of cycle parking is considered acceptable. However, it is not clear from the submitted drawing whether the quantum of residential visitor cycle parking could be reduced and the spaces redistributed to serve other uses within the development where required.

Car Parking Provision & Management

853 no. total car parking spaces comprising 804 no. at basement level including 44 no. disabled spaces and 49 no. surface level car parking spaces including includes 6 no. disabled spaces. Accessible parking provision is noted at 5.9%. 10% of spaces, 80 no. basement spaces and 5 no. surface spaces, are to be equipped with EV charging points and all spaces are to be future proofed for electrical charging. 34 no. motorcycle spaces (4%) noted as primarily for residents are also proposed at basement level.

An overview of applicable standards and proposed provision is outlined below.

Proposed Use (Units/GFA)	Table 16.1 (Maxima)	Standards	Proposed (Basement)	Proposed (Surface)
Residential (1137 units) • Car share	1/unit	1137	771 25	
Hotel (148)	1/3 bedroom	49	2	11
Offices (5,002 m2)	1/200 m2	25	2	5
Retail (2,622 m2)	1/275 m2	9.5	-	7
Clinics (12 rooms)	2 / consulting room	24	2	4
Crèche (4 rooms/969 m2)*	-	-	2	2
Cultural/Recreational (698 m2)	1/250 m2	2.5	-	-
Residential visitors	-	-	-	20
Total		1247	804	49

*No applicable standards for crèche facilities and maximum standard for schools at 1 space per classroom is noted by the applicant.

Basement car parking layouts are shown on Drawing no. NWLMUD-DOB-XX-SI-DR-C-0610. Parking bay dimensions for non accessible spaces of 4.8 m by 2.5 m are noted. Commercial basement spaces are provided within the 'west' basement, whilst the 'north' and 'south' basements contain residential parking only. Accessible spaces at basement level only server residential use. Auto track movements of the 3 no.

basement car parks are shown on Drawing no. NWLMUD-DOB-XX-SI-DR-C-0710. A few tight spaces are noted within the basement layouts which will have constrained access/egress opportunities.

A residential parking ratio of 0.68 plus 25 car share spaces is proposed. The submission notes that these spaces can reduce parking demand by approximately 350 no. spaces for the proposed development. No letter of intent from a car share provider is noted within the submission.

Surface level car parking includes 49 no. spaces, a mix of parallel and perpendicular: 24 spaces (including 4 accessible spaces) along the northern site boundary adjacent to Block A & B; 6 no. spaces (including 2 accessible spaces), adjacent to Block G, H, H2 and L; 9 no. spaces next to Block K and F; 6 no. spaces adjacent to Block D and B; and 2 no. spaces adjacent to Block C and D. It is noted that non-residential uses are concentrated at ground floor in Blocks A to D. The limited spread of surface car parking spaces and the ability of these to facilitate proposed uses are of concern to this division. Of note, there are no accessible spaces in proximity to the primary healthcare facility.

It is noted that the MMP sets car driver modal split targets for residents and staff at 25% and 35% respectively. The latter appears high when considering the quantum of commercial car parking proposed. It is also noted that the majority of commercial car parking is at surface level and the parking management strategy for this is not clear.

It is noted that access to basement car parking will be barrier controlled and authorised development occupants will gain access via fob system or similar. All basement car parking will be controlled by the management company and will be assigned by use through coding such as colour, markings, signage etc. residential parking will not be assigned to units, but will be allocated and/or leased to occupants on the basis of availability and need, in part by means of a permit/lottery system, in order to optimise the use of parking spaces. This approach is generally acceptable, however further details should be conditioned in the event consent is forthcoming. The car parking strategy should be applicable to surface level spaces as well. It is not clear from the submission how surface car parking and potential overspill parking within the proposed development is to be managed. The submitted Quality Audit has flagged concerns regarding overspill parking and service arrangements.

The NTA has raised concerns regarding the provision of residential car parking and recommended that this is reduced and that the balance with car share is reviewed. NTA has welcomed the approach taken by the applicant in regards to provision for other uses. Whilst a provision of 0.68 would not necessarily be considered excessive for the location, it is recognised that the scale of the proposed development will result in a noticeable impact on the surrounding road network. This also needs to be seen in the context of other permitted developments in proximity to the site and cumulative impact. Considering the surrounding road network, there is also limited potential for overspill and management of on-street parking should remove the potential for overspill parking within the proposed development. This division has previously accepted residential car parking ratio of 0.5 for similar developments within the area. The applicant should be requested to review residential car parking provision with the aim to reduce the provision and increase car share provision within the proposed development.

A car parking management strategy integrated with a mobility management plan will be essential for the operation of the site.

Construction Management Plan (CMP)

The submitted CMP and the Construction Stage Traffic Management Plan incorporated within are noted. There are four phases of construction outlined within the CMP. Phase 1 covers the western part of the site including the site access of Walkinstown Avenue. Phase 2 covers the northern section of the site and the access of Naas Road. Phase 3 and 4 covers the eastern part of the site. It is noted that there are basement excavation work associated with all four phases. The CMP notes that phasing activities will overlap.

Vehicular access during construction will be via Walkinstown Avenue. It is proposed to segregate vehicular and pedestrian access during construction. Peak traffic generating activities is anticipated during the earthworks phase. An estimated 10 no. spoil removal per hour during peak periods are noted. A combined 20 months of earthworks are noted across the construction phases. Predicted increases at survey junctions range between 0.4% to 3.1%. The latter is predicted at the Naas Road / Walkinstown Avenue junction during AM hours. A flow impact of 7.9% is predicted on Walkinstown Avenue AM hours. A detailed assessment of construction traffic has not been carried out noting the impact is less than 10%

on Walkinstown Avenue and less than 5% at the surveyed junctions. It is not clear from the submitted information whether there is likely to an overlap between operational and construction traffic.

Recommendations

It is recommended that Additional Information be requested in relation to the following:-

1. Serious concerns have been raised with regard to the interim options prior to CBC (both short-term and long-term) for Walkinstown Avenue, in particular the increased carriageway width and potential induced car capacity and the resulting impact on implementing the CBC; the left-in pocket and its impact on pedestrians, cyclists, buses; advisory cycle lane; and safety audit considerations relating to potential right-turns.

The NTA has requested that a long-term design with CBC for Walkinstown Avenue is implemented in tandem with the proposed development. This will require liaison with the NTA and Dublin City Council to agree on the design and the mechanism for delivery. The applicant should respond to DCC and the NTA on this matter.

2. The applicant should be requested to review the Environmental Impact Assessment Report in regards to the following:
 - a. The development description within Chapter 2 of the EIAR should be clarified in regards to development phasing and in particular, any overlapping of construction and operational phases. Estimated commencement timeframe for both should be provided. Combined effects should be assessed in relation to all applicable EIAR chapters and a review of sensitive receptors as appropriate.
 - b. Chapter 6: The applicant should review the assessment having regard to the clarification sought in relation to Chapter 2 of the EIAR in regards to potential combined construction and operational effects upon proposed access arrangements and the surrounding road network. The applicant is requested to clarify access arrangements during construction where such phasing is likely to overlap with the operational phase.
3. The applicant shall review the TIA in regards to modelling carried out for options with CBC in relation to junction configurations. The existing slips appears to be included as part of the CBC modelling.
4. The NTA has raised concerns regarding the loading bay on Walkinstown Avenue and its potential to interfere with buses and cyclists travelling north-south on Walkinstown Avenue by facilitating movement across the bus lane and cycle track and could give rise to vehicles parking inappropriately leading to safety issues. It is recommended that servicing is facilitated within the site. The applicant is requested to review service proposals including provision of loading bays/drop-off within the proposed development.
5. The applicant shall liaise with the NTA and DCC to agree location of bus stops on Walkinstown Avenue.
6. The applicant is requested to review the design of the junction on Naas Road. The radius of the junction and the addition of an island is not clear. The applicant should clarify if the existing access arrangement to the substation is to be integrated with the access to the proposed development.

7. The applicant should incorporate the pedestrian crossing of Naas Road, east of the Walkinstown Road /Kylemore Road junction, as part of the proposed development as recommended by the TII and to provide safe access to the Luas.
8. The applicant is requested to review the potential for through traffic from the Naas Road junction. In this regard, the applicant should be requested to review the design of the internal street layout and incorporate filtered permeability measures which would prevent vehicular access through the site.
9. The applicant should be requested to clarify changes to public footpath provision along Walkinstown Avenue. Public footpath provision at the junction with Naas Road and the proposed signalised pedestrian crossing should be increased to facilitate the development footfall. Similarly, the public footpath along Naas Road along the northern boundary of the site should be improved.

Pedestrian permeability proposals along the Naas Road should be altered to reflect a more targeted approach directing pedestrians towards the junction crossings within the proposed development. The public footpath/footway provision along the northern should be reviewed to facilitate this.

The applicant should be requested to clarify cycle access from Walkinstown Avenue. The design of this is not clear having regard to the junction with Walkinstown Avenue and the transition into shared surface within the internal street layout.

10. The applicant should be requested to submit a car parking management strategy covering basement and surface level parking along with management of potential overspill parking within the proposed development. The strategy should be incorporated within the Mobility Management Plan and as part of operational mitigations within the EIAR. The modal split should be revised to reflect the parking provisions proposed.

The applicant should be requested to review residential car parking provision with the aim to reduce provision and increase car share provision within the proposed development. This division has previously accepted residential car parking ratio of 0.5 for similar developments within the area.

The applicant should be requested to review on-street car parking layout having regard to intended user and whether the proposed location can facilitate these. Of note, there are no accessible spaces in proximity to the primary healthcare facility.

11. The applicant should be requested to clarify and review the external cycle parking proposals. The peripheral location of bike stores and short-term cycle parking with limited surveillance are of concern to this division. It is not evident from the submitted, if adequate cycle parking can be facilitated within these and which block they cater for and if secure cycle parking for staff is proposed. The link between short-term cycle parking and the end user is not clear. Consideration should also be given to redistributing residents' visitor parking to other uses. Cargo bike parking facilities should also be provided.

Heidi Thorsdalen

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