

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

APPLICATION NUMBER	3372/23
PROPOSAL	Development at this site (3.3746ha). The site is bounded by existing residential
LOCATION	Site currently occupied by 'Crumlin Shopping Centre' located to the north of Crumlin Road, Crumlin, Dublin 12. The site is bounded by existing residential dwellings to the north and east, Crumlin Road to the south and existing residential, dwellings and
APPLICANT	Better Value Unlimited Company
DATE LODGED	14-Feb-2024
APPLICATION TYPE	Permission

The Roads Report is below

TRANSPORTATION PLANNING DIVISION

25th March 2024

LODGED PLAN NO:	3372/23
DATE LODGED:	14th March 2023
LOCATION:	Site currently occupied by 'Crumlin Shopping Centre' located on the northern side of Crumlin Road, Crumlin, Dublin 12.
PROPOSED:	Redevelopment of Crumlin Shopping Centre including the erection of all buildings, and the erection of a two-storey shopping centre comprising a mix of uses with a GFA of 17,103m ² .
FOR:	Better Value Unlimited Company

TRANSPORTATION PLANNING DIVISION REPORT

Response to Further Information

Further information (FI) was requested on 8th May 2023 and the following FI items are noted by this Division:

- 1. The Planning Authority have concerns regarding the scale of the development for the site with particular regard to the plot ratio and site coverage and its compliance with the Dublin City Development Plan 2022 – 2028 with the site designated as a KUV (Key Urban Village KUV9) and with National and Regional Policy requirement to re-develop and provide appropriately scaled developments of underutilised sites. The applicant is therefore requested to respond to this issue.*
- 2. The Planning Authority are seriously concerned at the quantum of surface car parking proposed and the proposal not to integrate the adjoining former swimming pool site*

- within the overall scheme and request that the applicants submit a Masterplan for their entire landholding demonstrating how this proposal as put forward will not impede the future development of the entire lands for a higher density development. This may include indicative layouts showing how additional development may be accommodated around the shopping centre and confirming that the design of the shopping centre would enable the potential provision of upper floors in future.*
4. *The applicant is requested to respond to the Planning Authority's serious concerns regarding the working operations of the 'Dark Kitchen' and the disproportionate scale between the food market seating area in comparison to the overall size given over to the food market kitchens, i.e. 256sq.m as opposed to 884sq.m for kitchen and stores, and that this will function primarily as a large 'takeaway area', given the deficiency in restaurants with table service within the vicinity of Crumlin Village as noted by third parties and identified in the EIAR.*
 10. *The Planning Authority has concerns regarding the size and necessity for the proposed totem sign which is to be located at the front entrance to the car park, the applicant is therefore requested to review this aspect of the application.*
 12. *The applicant is requested to address the following Transportation Division further information request:*
 1. *The development by virtue of excessive over provision of car parking would encourage private car travel over sustainable modes, and would contravene Policy SMT1 and Objective SMT01 of the Dublin City Development Plan 2022-2028 which both seek to promote modal shift from private car use towards increased use of sustainable forms of transport such as active travel and public transport. The proposed development would also contravene Policy SMT26 and Appendix 5, Table 2 which seeks to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses. As such the development is not acceptable in its current format. The applicant is therefore requested to revise the proposal to reduce on-site car parking to the maximum permissible under development plan standards. The applicant should also submit a robust Mobility Management Plan which addresses the reduced car parking provision and promotes sustainable travel modes. Clarity is also required regarding assignment of staff and visitor parking.*
 2. *There are serious concerns regarding the applicant's approach to the assessment of the traffic impact of the development as set out in the EIAR and the Traffic Assessment. The applicant is requested to address the following:*
 - a) *The applicant submits that 'The development traffic once operational is anticipated to have a low level impact on the network in comparison to the baseline traffic.' There are serious concerns regarding how baseline traffic has been established and that the traffic baseline indicated does not reflect the current situation on the ground whereby the shopping centre is mostly vacant and generates very low levels of vehicular traffic. The traffic impact of the proposed development, fully operational and with 400 car parking spaces on site, over and above true baseline levels is likely to be far in excess of that indicated in the EIAR.*
 - b) *The construction assessment has not taken into account the proposal to retain operational supermarket traffic during the demolition and construction phases. The assessment in Chapter 11 states the opposite,*

indicating that there will be a negative impact during construction as operational traffic will be removed for this period.

c) The traffic assessment analysis has not taken into consideration Bus Connects when operational which will result in priority for buses over private traffic along Crumlin Road.

d) The traffic assessment does not appear to have taken into consideration the 'dark kitchen' use nor the potential impact arising from other development on the lands (within the blue line).

e) It is not clear if the proposed works to the site entrances to slow down traffic accessing and exiting the site would alter the impact assessment, this should be reviewed as the current junction modelling is based on existing junction dimensions.

- 3. Having regard to items 2 (a)-(e) above, it is considered that the applicant has not demonstrated that the proposed development will not generate unacceptable traffic impacts on the adjacent road network both in the current context and with Bus Connects in place and operational. The applicant has also not demonstrated that the traffic impact generated by the development will not negatively impact on the effective operation of the adjacent Bus Connects facility. The applicant is requested to address these concerns.*
- 4. It is noted that adjacent lands within the applicant's ownership are identified within the blue line of the application. It is also noted that these lands are identified for potential future residential development. In order to fully assess the transportation impacts of the overall development of the applicant's lands and to ensure that the access and movement layout proposed can adequately accommodate the additional future development, the applicant should be required to provide an overall masterplan for the site including the lands within the blue line. There is serious concern that the development as proposed, including in particular the access arrangements, could impede the development of the adjacent site. From an access point of view, the most appropriate and safe means of access to the adjacent site would be from within the shopping centre complex. There are concerns that the eastern junction and access as currently proposed would not accommodate the future development of this site. The applicant is requested to address these concerns.*
- 5. It is noted that the proposed development is described as proposing the 'retention' of 400 car parking spaces. However, as the entire site is being redeveloped, it is not appropriate to refer to retention of car parking spaces. Furthermore, the layout of the car park is being redesigned as part of the proposed development and as such there is no part of the site being retained as is. The applicant is therefore requested for clarity to omit the proposal to 'retain' existing car parking from the development description.*
- 6. It is noted that the proposed development includes provision for a 'Food Market' with 7 no. kitchens. However, it would appear that the intention is for use of these kitchens as 'dark kitchens' with a significant delivery element having regard to the additional facilities proposed in the form of 'decant courier' area, courier car and cycling parking provision and cyclists' facilities etc. This use, if proposed, has not been adequately described in the application and the potential impacts of the use would not appear to have been adequately assessed. The applicant is requested to clarify the intended use of the 7 no.*

kitchens and to address this proposal in all relevant assessments including in the EIAR.

7. *There are several concerns with the overall proposed layout of the site. The applicant is requested to address the following concerns:*

- a) *Servicing - The eastern access is being retained largely as existing despite the complete demolition and reconstruction of the shopping centre which provides the opportunity to improve this junction and access road. There is concern that the access and service road are too narrow to accommodate the level and type of service vehicles that are required to service a development of this scale. Also, the service area has been reduced from the current layout and there is concern that there may be conflict between service vehicles, refuse vehicles and vehicles accessing the recycling facilities. The Road Safety Audit also highlights this issue. Furthermore, the click and collect parking and car and cycle courier parking are located adjacent the servicing area which gives rise to the potential for additional conflict. It is in fact not clear if cycle and car couriers are supposed to use the service access also. This gives rise to safety concerns.*

- b) *Pedestrian and Cycling Environment - The overall layout of the development is car dominated, particularly the car parking layout, with poor provision for pedestrians and cyclists, for which routes are not delineated within the site. The 'dark kitchen' use, assuming this is proposed, would generate significant cyclist numbers to the site but this does not appear to have been addressed in the proposal.*

- c) *Pedestrian access along the Crumlin Road elevation does not appear to optimise access for all, the design should be reviewed having regard to Sections 8.5.4 and 15.4.4. The planting and steps design is noted as creating pinch points in terms of access between the public footpath and the proposed development.*

- d) *The proposed raised table at the Crumlin road junction is not on the pedestrian desire line and should be reviewed. The stop line conflicts with the pedestrian crossing and there are traffic safety concerns regarding the design of the junction, the volume of traffic proposed to be generated due to car parking proposals, in particular conflict between pedestrians and vehicles queuing to exiting the site.*

- e) *Public Realm along Crumlin Road - The layout of the area to the front of the development along Crumlin Road with and without Bus Connects is noted. There is concern that the layout without Bus Connects does not provide a clear unobstructed public footpath along Crumlin Road.*

- f) *Road Safety Audit (RSA) - It is noted that the RSA highlights several of the issues raised above. However, it is not clear or evident if or how these issues have been addressed in the submitted layout.*

8. *The applicant is requested to review improvements to the pedestrian connectivity to the site, in this regard the position of the existing controlled pedestrian crossing does not align with the main entrance and consideration should be given to reposition this to align with CBC proposals.*

9. *It is noted that the proposal identifies what is referred to as a 'mobility hub' as part of the proposed development. Mobility hubs, which generally include a*

strong shared mobility offer, are normally provided in situations where limited or no car parking is proposed. The hub is intended as an alternative to private car ownership as the users can avail of shared bicycles or cars in place of needing to own a bike or car. Having regard to the above, the applicant is requested to provide a rationale for the inclusion of a mobility hub within the development and to outline who are the intended users of same.

- 10. It is noted that the applicant proposes to keep the existing supermarket operating during construction. There are serious concerns regarding this proposal as it is not clear how this can be achieved safely and how construction traffic can be separated from normal traffic and in particular pedestrians and cyclists. The applicant is requested to address these concerns.*
- 11. It is noted that totem signage of a significant scale is proposed at the main entrance to the site. Inadequate detail has been submitted to enable a proper assessment of the impact of this signage on sightlines and on pedestrian space and desire lines.*
- 12. The applicant is requested to demonstrate compliance in a revised car parking layout with the e-charging standards set out in the newly adopted development plan which require 100 per cent ducting and 50 per cent provision of e-chargers in car parks.*
- 13. More detail is required in relation to cycle parking. The applicant is requested to submit layout plans for all cycle parking areas clearing indicating number and type of cycle stand proposed. Clarity is required regarding staff and visitor cycle parking provision, and to optimise cargo and accessibility cycle parking. Layout of cycle parking does not appear to correspond with access proposals and access to cycle parking appears to be blocked by collection/drop off proposals.*

Item 12(1)

The applicant's responses to Item 12(1) and Item 1 are noted.

The proposed car parking provision remains at 400no. spaces (including 260 no. standard spaces, 40no. family spaces, 20no. accessible spaces, and 80no. EV spaces). Other mobility changes proposed are noted and considered in more detail under relevant FI items. No Mobility Management Plan has been submitted.

The applicant has submitted further justification for the proposed car parking, and concludes that 400 spaces represents adequate car parking for the proposed development. Car park surveys of other existing Dunnes Stores sites, with c. 600 car parking spaces, have been submitted. A survey of the use of the existing application site car park has not been submitted. The applicant also references consumer demands and the economic viability of the site. The applicant notes that the majority of shoppers should be provided with a car space to facilitate big trolley shops. The applicant also references car parking provision permitted under the now lapsed 2010 permission (reg. ref. 3078/09). Furthermore, the applicant emphasises that the proposed 400 spaces are a reduction from the existing 503 spaces (20%), and reflects upon a do-nothing-scenario e.g. retaining 503 car parking spaces. From review of the submitted traffic counts (May 2022), the existing car park is operating substantially below capacity. This might be as a result of the existing shopping centre being largely empty, or also the location of the site, catchment area and access to public transport.

The applicant sets out how the site is well-served by public transport. Noting the high-capacity bus corridor along Crumlin Road, and how conveniently located the site is by foot and bicycle with controlled pedestrian crossing points and cycle lanes already in situ. The applicant notes that these provisions provide a legible and convenient network for sustainable travel to the site. The proposed development also includes for extensive cycle parking, which are welcome and in accordance with the Development Plan. It is not

clear however, from the submitted information what level of mode share the applicant is anticipating for the sustainable transport options. In this regard, when the convenience of the car is being largely maintained in the design, then the effectiveness of alternative travel options are likely to be reduced. The applicant has not submitted any survey information relating to sustainable transport for the operation of the existing site or the other Dunnes Stores sites referenced by the applicant. And as noted above, the applicant seeks to provide the majority of shoppers with a car parking space to facilitate big shops. The submitted Social and Cultural Audit sets out that a 1km radius of the site serves a population of 30,000. This coupled with the ease of access to public transport, clearly shows that there are opportunities for a less car-orientated development to be considered. The applicant also references that the proposed development promotes the national policy of Avoid-Shift-Improve, although given the car-orientated design retained for the site, how this is being applied is not clear.

In response to requests regarding the scale of the development, the applicant has responded that the car park hinders further development of the site. There are also reference to the proposed development being a short term option for the site, it is however not clear within the submission what signifies the long term solution for the site. The applicant notes that the proposed development provides the opportunity to establish a commercial core which would in turn encourage population growth. In regards to this, a more efficient use of the land as part of the proposed redevelopment could potentially deliver both.

The applicant notes in reference to Policy SMT 26 that adequate parking is not defined within the Development Plan. In this regard, parking standards applicable to uses are clearly outlined within Table 2, Appendix 5 of the Development Plan. The combined maximum parking standards for the revised development proposals equate to 144 no. spaces as submitted by the applicant. The 400 no. spaces proposed represents a 277% increase on applicable maximum standards. Whilst Table 2, Appendix 5 allows for an increase in parking standards, where this is sufficiently justified, the proposed is considered excessive. The justification provided by the applicant focuses on retaining existing provision and comparison with other sites with extensive parking, there is limited or no consideration given to an alternative less car dominated approach. As noted above, retaining the convenience of the car is not necessarily going to facilitate a shift towards more sustainable transport options.

The NTA's comments regarding extensive surface car parking and the associated impact on development intensity are noted. The NTA further queries whether the proposed development maximises the opportunity afforded the site via its centrality and high levels of accessibility by sustainable transport modes, for a more intensive, less car-oriented development.

Considering the above, the material submitted by the applicant has not addressed the concerns raised by this division in the FI. The extensive surface car parking provision substantially exceeds the applicable Development Plan standards. The applicant has not demonstrated the need for the proposed quantum of car parking. It has not been demonstrate how the proposed development, which is largely car-orientated, would support a modal shift from the private car towards more sustainable transport forms in this central and highly accessible location.

Item 12(2a-e) and 12(3)

The applicant has submitted updated assessments, and the Addendum to EIA Traffic Chapter and the revised Traffic and Transport Assessment (TTA) are noted.

The applicant has applied a forecasted baseline. A baseline which assumes the existing largely empty site, in its current condition, is fully operational in 2025 (assumed opening year of proposed development). This forecasted baseline has been created by combining traffic counts May 2022, TRICs data for similar developments and TII growth figures. Of note, the TTA Tables 8.2 and 8.3, clearly show the variation between the two baseline scenarios. It is not clear from the submission how the TRICs data and the trips generated by the existing operations have been accounted for in order to avoid any double counting of the latter.

As per the EPA EIAR guidelines (2022), a baseline should represent the current environment, or, if applicable, a 'likely evolution' of the baseline. What quantifies as a 'likely evolution' in this instance,

would be traffic counts (May 2022) with the addition of TII growth figures (Table 8.1) to allow the data to be forecasted to 2025 (opening year). A fully operational existing site by 2025 is not considered a 'likely evolution' of the baseline given the site is partially boarded up, largely empty and a full demolition of the site is being proposed.

The application of the forecasted baseline, as outlined above, has resulted in a skewed traffic assessment. The likely vehicle trips generated by the proposed development has been compared against an inflated baseline, thereby reporting reduced percentage traffic increase at the assessed junctions. It is as such, not clear if additional junctions should have been modelled. It is noted in the EIAR that the 5% is set as a threshold for construction traffic rather than 10% which has been set for operational. The 5% is considered applicable for Crumlin Road and adjacent junctions. Furthermore, the assessments presented in TTA Table 8.3 and 8.4, indicate that the proposed development would reduce the impact on the site junction, and that junction improvements (Item 12 (2e)) and car park reduction, would mitigate some of the substantial queuing and delays presented by the forecasted baseline. The assessment presents a baseline scenario where the junction is not operating within capacity, when in reality it is currently operating within capacity when considering the output presented within Table 8.2. It is also noted that the revised layout submitted at FI has altered the proposed junction to allow for greater capacity, two exit lanes.

In terms of trip generation for the proposed development, the applicant has discarded the TRICs data as relied upon within the application submission and incorporated survey data for Ashleaf Shopping Centre, noting that this would be considered comparable. This division would have liked to have seen some further interrogation of this data, in particular in terms of location, access to sustainable transport and comparison with the current baseline from Crumlin Shopping Centre. Furthermore, given the different approaches adopted for the forecasted baseline (TRICs) and the proposed development (Ashleaf SH survey), it is not clear whether the results presented are comparable.

Taking account of the above, it has not been sufficiently demonstrated within the assessment what the impact of the proposed development on the 'likely baseline' would be, and the effect of the development on the current baseline as reached in EIA terms appears to be understated. This division cannot accept the traffic assessment as submitted.

The applicant has submitted additional construction traffic assessment within the EIAR Addendum, and further phasing information of the site has been included within the TTA. The construction assessment is based on the current 2022 baseline (Table 1.5), and as such the percentage increase in traffic on the surrounding road network from the construction phase appears to be similar to that of the operational phase. This is not correct, but is a result of the varying baseline applied. It is not clear whether the eastern access, which is identified as the construction access, has been assessed from the scope outlined within the TTA and EIAR Addendum. The assessment concludes short-term, neutral and not significant effects, but also refers to further details by in Construction Traffic Management Plan in due course.

The conclusions of the construction assessment appear reasonable in terms of traffic impact. However, there are parts of the assessment that could have benefitted from further clarity given the construction access alters from the main access, an access with limited current vehicular traffic and one which would operate in combination with the main car park access during the dual construction/operational phase. A detailed Construction Traffic Management Plan would need to be conditioned in the event consent is forthcoming.

Item 12(2c) has not been addressed in the FI submission. The operational traffic assessment has not been updated to take account of a future delivery of Bus Connects, and the changing baseline environment along Crumlin Road as a result. The applicant has stated that the impact of BusConnects on Crumlin Road is not known, given the application and Transport Impact Assessment for the Busconnects is in the public domain, this is not clear. Incorporating BusConnects traffic data is standard for cumulative assessments, and similar assessments are being carried out for developments along the Busconnects corridors across the City. The applicant notes that Busconnects could potentially create westbound queues from the bus gate stop-line on Crumlin Road back towards the shopping centre impacting on the car park traffic. This

however, has not been assessed in the revised traffic assessment, as such the cumulative impact on Crumlin Road is not clear.

Item 12(2d) the applicant in the revised proposals notes that 'dark kitchen' use has been omitted. The applicant has submitted an indicative masterplan for the blue line site, but noted that this would be subject to a future application and assessed at that time.

Item 12(4)

The applicant has stated that the future access arrangements for the adjacent site within the applicant's ownership is not of relevance to this application. An indicative masterplan has been submitted, referring to existing access arrangements and junction capacity. This indicates the proposed development would not prevent future access, however the submitted details are limited. As noted above, no further assessment has been submitted.

Item 12(5)

The applicant in their submission has not altered their position regarding retention of car park. The existing development is proposed to be demolished and the site to be fully redeveloped, as such no component of the existing is being retained. Phase 4 of the construction phasing is noted as car park. Dublin City Development Plan 2022-2028 is applicable to all components of the proposed development.

Item 12(6)

The applicant states that the proposed development has been revised and 'dark kitchens' component omitted. The revised development incorporates a reduction in kitchens from 7 to 4, and an increase in seating area to 434 m². No further assessment relating to the kitchen use has been submitted in terms of traffic.

Item 12(7a-f)

The FI response by the applicant has not satisfactorily addressed a number of design considerations raised.

No change is noted to the eastern access or service yard, Item 12(7f). Appendix D of the TTA which includes swept path analysis does not appear to have been included in the submission, as such auto tracking of the service yard has not been reviewed. The applicant notes that a yield system is proposed at the entrance gates, allowing inbound traffic to enter. Without auto tracking it is possible to review the proposed, and the area leading up to the gate appears constrained in terms of two-way ridged truck traffic. In the event consent is forthcoming, traffic operations along the eastern access would need to be conditioned including a repositioning of the entrance gate and potentially a signalisation system.

The design of the western access, the main junction has been revised to accommodate increased capacity for cars is being proposed, with one entry lane and two exit lanes. The revised design is reported within the assessment as a mitigation to improve the capacity of the junction and reducing queuing within the site. The revised junction crossing for pedestrians is 9 m, and the raised table does not align with pedestrian desire lines along the footpath (Item 12(7d)). The raised table and junction stop line conflicts, resulting in vehicles queuing across the raised table (Item 12(7d)). The RSA has not been updated to take account of the revised junction design. In the event consent is forthcoming, a revised junction, one-way in and one-way out should be conditioned, however it is important to note that this would alter the traffic assessment as submitted and result in substantial increase in queuing within the site.

The design of pedestrian access along Crumlin Road does not appear to have altered in the FI response (Item 12(7e)). Some interim landscape and suds proposals for the public domain have been included, but how these interlinks with BusConnects is not clear. Abortive works would not be supported. See response to Item 12(8) below.

Item 12(7f), the RSA has been resubmitted as part of the FI response with a completed Appendix C Designer Feedback Form. Legally required signatures for the RSA is missing from this page. The feedback form also appears to respond to the Audit dated January 2023. A revised audit has not been carried out for

the revised junction design as noted above. A revised Stage 1 audit should be conditioned in the event consent is forthcoming.

Item 12(8)

The applicant states that the relocation of the existing controlled pedestrian crossing to align with BusConnects is outside the application boundary, and that it would be premature to carry out this in advance of BusConnects. The applicant notes that a repositioning of the pedestrian crossing pedestrian would however, align with the entrance of the proposed development. The applicant further notes that interim works within the public realm to the front of the site could be carried out, but that this should be done by Busconnects. The applicant's response offer no further improvements the public realm to the front of the site in terms of pedestrian connectivity. In the event consent is forthcoming, a condition requiring further public realm improvements to the front of the site including the repositioning of the controlled pedestrian crossing. Works to be agreed with DCC Environment and Transportation Department and the NTA.

Item 12(9)

The applicant states that the proposed mobility hub will provide for cycle parking (196 no. short term spaces), information on sustainable transport networks, taxi facilities, bicycle charging/maintenance, parcel lockers and motorcycle and scooter parking. No shared mobility offering is noted. The purpose of the proposed mobility hub is not clear having regard to Policy SMT5, and given the car-orientated development being proposed. From review of the submitted layout, the mobility hubs appears to centre around cycle parking stands.

Item 12(10)

The applicant has submitted additional construction phasing details including revised access proposals during construction. Servicing is to be rerouted via the western access and the existing car park and construction access including access to compound is via the eastern access. No auto tracking has been submitted. The access strategy confirms that construction and operational traffic is to be kept separate. A detail Construction Traffic Management Plan should be conditioned in the event of consent.

Item 12(11)

The applicant has confirmed that the totem sign is 6 m in height and is to assist visitors travelling by car to navigate the site. The applicant notes that sightlines have been submitted in terms of junction. However, these do not appear to have been included in the submission. The totem sign appear to be located at the desire line for the pedestrian crossing at the main junction. This division considers the proposed sign to be excessive in scale, dominate of the streetscape and the carriageway. It is recommended that it is omitted or revised design sought by condition should a consent be forthcoming.

Item 12(12)

The applicant has proposed 80 no. EV spaces, nothing that this would be a reasonable quantity for a car park of the proposed scale and that 200 EV spaces would not be used. On balance, a 20% provision is considered acceptable. Remaining spaces would need to be future proofed.

Item 12(13)

The revised proposals include for 267 no. cycle parking spaces. Whereby 196 no. standard spaces are located within the mobility hub, 6 no. non-standard spaces located along the western façade and 65 long-stay spaces located in-door or caged. In terms of quantity, the proposed exceeds the Development Plan standards, and the increase in staff parking is welcome. The location of some of the cycle parking, in particular along Crumlin Road appears to impact on pedestrian access. In the event consent is forthcoming, a condition to agree final cycle parking location and layout details are required.

Recommendation

This division recommends that planning permission for the proposed development is refused for the following reasons:

1. The development by virtue of excessive over provision of car parking would encourage private car travel over sustainable modes, and would contravene Policy SMT1 and Objective SMT01 of the Dublin City Development Plan 2022-2028 which both seek to promote modal shift from private car use towards increased use of sustainable forms of transport such as active travel and public transport. The transition to sustainable transport modes forms part of effective integration of land use and transportation, and the proposed development would contravene the Settlement Strategy and the Core Strategy of the Development Plan, and Policies CA3 and SMT03 as it would fail to deliver compact growth and sustainable growth and would not contribute towards growing a low carbon society. The proposed development would set an undesirable precedent, and would be contrary to the proper planning and sustainable development of the city.
2. The proposed development would by virtue of excessive over provision of car parking contravene Policy SMT26 and Appendix 5, Table 2 of the Dublin City Development Plan 2022-2028 which seeks to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses, and thereby, limiting car parking at destination and changing travel behaviour and promoting sustainable development and sustainable living within the city. The proposed development would set an undesirable precedent by promoting car based developments. The development would therefore, be contrary to the proper planning and sustainable development of the city.
3. The development by virtue of serious under development of a significant landholding immediately adjacent a QBC and Bus Connects corridor would contravene policy SMT5 (Integration of Public Transport Services and Development) of the Dublin City Development Plan 2022-2028 which seeks to support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.
4. The applicant has not demonstrated that the proposed development will not generate unacceptable traffic impacts on the adjacent road network both in the current context and with Bus Connects in place and operational. The traffic baseline used in the EIAR Addendum and the Traffic and Transport Assessment does not represent a 'likely evolution' of the existing traffic conditions and as such, is not in accordance with applicable EIA methodology. This division cannot accept the traffic assessment as presented within the EIAR, EIAR Addendum and the Traffic and Transport Assessment as submitted.

Heidi Thorsdalen, Senior Executive Planner
On Behalf of Edel Kelly, Senior Transportation Officer