

**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

28th April 2023

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

Proposed Development

Description as per Site Notice:

The proposed development comprises the overall demolition of existing buildings and structures on site (11,444 m²) and the construction of a Shopping Centre with an overall height of 12.9m and an overall gross floor area of 16,892.8 m² (of which the shopping centre building is 16,678.4 m², with the remaining 214.4 m² forming detached ancillary accommodation outside the footprint of the main shopping centre building), comprising the following:

-Provision of a new anchor retail unit at ground floor and part first floor (10,245.8m²) comprising 8,983.1 m² retail floorspace (grocery and textile) including off-licence, 2no retail concession stalls (112.7 total m²) and ancillary café area (135.6 m²) associated with the anchor retail unit and an online grocery pick up room located to the rear of the proposed development (224.4 m²). The anchor retail unit will be served by all associated ancillary accommodation located at ground and first floor levels (1,262.7 m²) including storage areas comprising freezer rooms, fresh produce room, dairy room and cold meat room, loading areas, switch rooms, ESB meter rooms, water storage room and staff facilities including toilet, shower and changing facilities, kitchen, lockers and associated offices and break out rooms;

-Provision of a 'Food Market' (1,149.7 m²) with 7 no. kitchens on ground floor level located within the proposed shopping centre with associated 'food court' including food counter and seating area located off main mall area (265.9 m²) for consumption of hot food on and off premises including and off premises including ancillary take away function and associated ancillary accommodation including offices, store rooms, chill and freezer rooms, water storage room, F.M calorifier room, ESB rooms, switch rooms and staff toilet and changing facilities. In addition, dedicated and enclosed courier parking to serve the Food Market is located to the rear of the proposed shopping centre;

-Provision of a cafe unit (413.2 m²) with kitchen serving area and stores with independent access via Crumlin Road on southern elevation and 4 no. independent retail units (ranging from 107.3 m² to 182.4 m² each, totalling 545.2 m²) with associated staff areas located on the ground floor adjacent to the entrance on western elevation with access via main internal mall area;

-Provision of a library facility with flexible exhibition / community/ arts and cultural multi-function space (1,046.7 m²) located on the ground and first floor of the proposed development with independent access located on ground floor level at the south- eastern corner fronting on to Crumlin Road. The library will also include all associated ancillary accommodation including lobbies, stores, a water storage facility, toilet and changing facilities and a staff room;

-Provision of a gym facility (1,620.7 m²) located on the ground and first floor of the proposed development with independent access located on ground floor level on the western elevation.

The proposed shopping centre will be served by a public toilet block (215.5 m²) with associated accommodation including cleaning, parent and sensory rooms, wheelchair accessible toilet and changing facilities, a reverse vending machine, mall and circulation floor space including service corridors, associated stair / lift cores and fire exit corridors, a CCTV and security room, a gas meter room, and a loading bay to the rear with associated pallet areas (to be served via existing service entrance adjacent to south- eastern boundary of site on Crumlin Road), totalling 1,657.1 m².

The proposed development includes a sprinkler tank, pump room, ESB substations, switch rooms, a generator and transformer and a recycling bottle bank all located to the rear of the proposed development, totalling 214.4 m².

The proposed development also includes the provision of a mobility hub located adjacent to the western entrance to the development on the southern boundary which will provide safe and secure bicycle parking, a taxi rank, an interactive map, a USB charging facility, a pump, parcel lockers and scooter parking.

In addition, the proposed development includes the retention of 400 no. existing car parking spaces on site which will be upgraded with the provision of 80 no. EV Charging car parking spaces, family car parking spaces, 'click-and-collect' car parking spaces and online delivery infrastructure, wheelchair accessible car parking spaces and car share scheme car parking spaces. The proposals also include 20 no. motorcycle parking spaces and 267 no. bicycle parking spaces including 6 no. cargo bicycle parking spaces. The bicycle parking spaces will be accommodated in dedicated bicycle parking stores (44.5 m² + 35.18 m²) located to the rear and adjacent to the northern boundary respectively, and through the provision of external bicycle stands.

The development will be served by the existing vehicular and pedestrian access off Crumlin Road with proposed upgrades including a raised table at entrance. A separate access for deliveries and services is also proposed which will be located on the south-eastern corner of the site on to Crumlin Road with proposed upgrades including a raised table and service yard gate.

The development will also involve the provision of urban realm upgrades and improvements including hard and soft landscaping to the south of the proposed building along the Crumlin Road, provision of associated signage on western and southern façades including a 6m high totem pole located adjacent to the main vehicular entrance on Crumlin Road and a 3m high totem pole located adjacent to the

entrance on the western façade, boundary treatments, public lighting, solar panels on roof, green roofs / SUDs treatments, retention of existing taxi rank on Crumlin Road and provision of foul, surface water and water services on site with connections and modifications to existing.

An Environmental Impact Assessment Report & Natura Impact Statement (NIS) have been prepared in respect of the proposed development.

Location

The application site comprises a plot approximately 3.3 hectares in area which contains the existing vacant Crumlin Shopping Centre and another vacant building at the southeast corner, formerly in use as a leisure centre. The site is bounded to the south by Crumlin Road, to the east by Herberton Road, to the north by Keeper Road and to the west by Brickfield Drive. The site is located on the eastern section of Crumlin Road (a main arterial route, the R110 regional road, into the city centre from the M50 motorway and western suburbs), close to the junction with Herberton Road and Sundrive Road, and is approximately 3km south west of the City Centre.

There are 2 no. access roads into the site from Crumlin Road, sited at the south east and the south west corners of the site respectively.

Pre-Application Discussions

It is noted that the applicant engaged in pre-application consultation with the Development Management section of the Planning Department prior to the submission of the application. There were no pre-application consultations with this division however.

Letter of Consent

The inclusion of a Letter of Consent from DCC within the application submission is duly noted. The red-line boundary of the site includes land in the public domain along the Crumlin Road, including the two existing vehicular accesses to the site.

Relevant Planning History

3078/09/x1 - Planning Permission granted for extension of duration of permission until 17 March 2020.

3078/09 – Planning Permission granted (Feb, 2010) redevelopment of a substantial part of the existing Crumlin Shopping and the upgrading and resurfacing of the existing car park. The new development ranges in height between 11m and 15m above finished ground floor level. The development will include the redevelopment of the two anchor retail units, with redeveloped anchor unit no. 1 having a GFA of 9,288m² containing 3,500m² net convenience floor space excluding off license sales and comparison floor space. A restaurant/café (538m²) is provided at mezzanine level together with associated storage areas, staff canteen, changing facilities and ancillary office space. Retail anchor unit no. 2 will contain 2,316m² net convenience sales floor area with storage and staff areas at mezzanine level (1,435m² GFA).

The redeveloped centre will also include four retail units (513m² total) (in addition to the 3no. units to be retained), and a cafe (136m²) accessed from a new internal mall (354m²) that opens onto the existing and reconfigured surface car park (containing 490no. car parking spaces) on the western part of the application site. Customer toilets (58m²) will also be provided. A management suite (108m²) is provided at mezzanine level with access from the new internal mall. The first floor, facing Crumlin Road will contain floor space that can be used as a library (1,330m²) or for office accommodation (1,330m²) with new entrance from Crumlin Road and open space areas at first floor level (3no. at 125m² each). The existing service/delivery areas to the east and west of the shopping centre will be retained and accessed via two existing separate entrances from Crumlin Road. The eastern entrance will be restricted to service/delivery vehicles only and staff parking. This planning application includes all site development works, signage, boundary treatments, landscaping and associated plant

machinery and 2no. ESB substations for the proposed development and will be accompanied by an Environmental Impact Statement (EIS).

Third Party Comments

A number of third party comments were received by the statutory deadline. A number of issues of relevance to this division were raised including:

- Construction Management / Traffic Management Issues
- Road Safety Audit issues
- Overprovision of car-parking spaces
- Under-provision of cargo-bike spaces
- Strategic traffic management plan similar to the (Docklands Traffic Management Plan) required for the locality

NTA Comments

BusConnects – Greenhills to City Centre Core Bus Corridor Scheme

The NTA is currently preparing an application for planning consent for the Greenhills to City Centre Core Bus Corridor Scheme for submission to An Bord Pleanála. The proposed development interfaces with this scheme. Reference to this issue, and the consultation undertaken in advance of this application being lodged, is made in the Planning Report submitted as part of the application. The NTA confirm that the proposed development, as set out in Drawing No PL05 “Future Public Realm Improvement Proposal with BusConnects” would facilitate the Greenhills to City Centre Core Bus Corridor Scheme.

The NTA recommends that, in the event of a grant of permission, a condition is attached requiring ongoing liaison with the NTA in order to ensure that the proposed development and the CBC scheme progress in an integrated manner.

Car Parking

Car Parking Measure TM14 – Destination Parking Standards of the Transport Strategy states the following: “The NTA, in cooperation with the local authorities, will ensure that the quantum of parking provided at destinations (non-residential commercial developments) will be significantly reduced at all locations in the GDA”

Measure TM18 – Parking Management at Retail Centres – of the Transport Strategy states the following: “The NTA will, in conjunction with local authorities, assess the need for the introduction of parking charges at retail developments in order to reduce the impact of car traffic on these locations and their local communities, and will seek the implementation of the outcomes of that assessment.”

The NTA notes the proposed provision of 400 car parking spaces, which is significantly in excess of the 114 maximum number permissible under the Dublin City Development Plan and the absence of a commitment to manage travel behaviour via a parking charging scheme or any other measures aimed at reducing the need for parking at the proposed development. The NTA also note the reliance on the number provided at existing retail developments, and the fact that there are over 500 spaces currently on the site, as a rationale for such an overprovision. It is the view of the NTA that developments carried out under different policy environments in different transport contexts should not form part of the consideration of this application and that the provisions of the Dublin City Development Plan and Transport Strategy should be applied when assessing this application.

The site of the proposed development is close to the city centre; well served by existing public transport; within walking and cycling distance of a large catchment; and will be served in the future by improved public transport and cycling networks. As such, it is the view of the NTA that the proposal for an extensive surface car park providing 286 more spaces than permissible, with the associated impact on development intensity (site coverage and plot ratio), may not be the most efficient use of land in this highly accessible, inner suburban location and may encourage use of the private car for

trips to the proposed development that could be undertaken using other modes. Recommendation The NTA recommends that, in assessing this application, Dublin City Council consider the extent to which 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.

TRANSPORTATION PLANNING DIVISION COMMENTS

This division has several serious concerns with the proposed development which are set out below.

Description of the Proposed Development

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. It is considered that this use has not been adequately described in the application and the potential impacts of the use would not appear to have been adequately assessed. The traffic and movement impacts in particular do not appear to have been included in the EIAR Traffic and Transport Assessment (chapter 11).

It is also 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. The provision of car parking spaces will be assessed in the context of the overall proposal. 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.

Adjacent Lands in Applicant's Ownership

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 preclude the development of the adjacent site. Certainly 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.

Mobility Strategy for the Site

The mobility strategy for the development is dominated by the encouragement and accommodation of car travel to the site deriving from excessive provision for car parking. While the provision of cycle parking is noted as is the applicant's reference to the site's accessibility to public transport, the provision of 400 car parking spaces on site will result in an unacceptable level of car travel to the site. The applicant estimates this as 75% mode share of all travel. The mobility strategy underpinning the development is seriously unsustainable and is therefore unacceptable. Some specific elements of the strategy are discussed below.

Car Parking

The application site is located in Area 2 of Map J of the current development plan. Accordingly, the maximum number of car-parking spaces permissible as per Table 2 of Appendix 5 of the Development Plan is 114 no. spaces. The applicant proposes 400 no. car parking spaces to serve the development, which exceeds development plan standards by 286 no. spaces. In percentage terms, the applicant proposes 250% in excess of the maximum development plan standards. The applicant submits that the proposed level of car parking is appropriate having regard to the proposed use, the existing level of parking on site and in the context of other shopping centre developments which have been in place for decades.

The applicant's rationale for the excessive over-provision of car parking on the site is not accepted. The restriction of car parking at destination as a travel demand management measure has been embedded in Dublin City Council development plan policies since the 2005-2011 development plan. Three development plans on, restricted provision of car parking at destination is still the most important factor in limiting car travel to a site. Excessive car parking provision as part of the development would encourage and facilitate travel by car above all other means to the site which would be unsustainable and would seriously conflict with the City's sustainable mobility policies.

Mobility Hub

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. In this context, the rationale for the mobility hub is not clear. Also, while e-charging facilities are welcomed, the applicant is in any case required to comply 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.

Site Layout

There are several concerns with the overall proposed layout of the site. These are outlined under sub headings below.

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.

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 in fact proposed, would generate significant cyclist numbers to the site but this does not appear to have been addressed in the proposal.

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.

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.

Impact of Signage

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.

EIAR Chapter 11

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. In summary, 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.'* The baseline traffic referred to appears to have been established using TRICS based on the floor area of the existing footprint and on the assumption that this floor area is fully occupied and operational. In other words, the traffic baseline does not reflect the fact that the shopping centre is mostly vacant with only a supermarket open on site which currently generates very low levels of vehicular traffic. Also, site visits show clearly that only a small proportion of the car parking on site is ever occupied. The baseline assumption as put forward is clearly not reflective of the situation on the ground. 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.

Other concerns with the traffic assessment relate to the fact that the analysis has not taken into consideration Bus Connects when operational which will result in priority for buses over private traffic along Crumlin Road. The 'dark kitchen' use, assuming that this is what is proposed, also appears not to have been included in the assessment. Nor has the potential impact arising from other development on the lands (within the blue line).

Construction

It is noted that the applicant proposes to keep the existing supermarket operating during construction. 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.

Recommendation

As is evident from above, this division has many serious concerns with the development and has highlighted many issues requiring clarification and further information. As the overall principle of the development is unacceptable, it is recommended that a refusal issue 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 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. The development would therefore, be contrary to the proper planning and sustainable development of the city.
2. 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.

Paddy O'Connor, Executive Planner

Edel Kelly, Senior Transportation Officer