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Technical Note 210128-DBFL-TR-XX-TN-C-0001

Project:	Wilsons Auctions, Green Isle Road, Clondalkin, Dublin 22	**Prepared by:**	IA
Title:	Clarification of Additional Information	**Checked by:**	TJ
Client:	Wilsons Auctions Ltd.	**Date:**	16 December 2021
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1.0 INTRODUCTION

This technical note addresses Item No. 2 of a Clarification of Additional Information (CAI) request raised by South Dublin County Council (SDCC) on 11 November 2021. The proposals (SD21A/0051) by RGR Holdings Limited seek permission for the continuance use of the existing 3 buildings and all associated external areas at Wilsons Auctions, Green Isle road, Corkagh, Clondalkin, Dublin 22.

In CAI Item 2, SDCC reveal that Transport Infrastructure Ireland (TII) has raised objections to the proposal stating:

'With reference to the further information submitted in connection with the above planning application, I wish to advise that the Authority's position remains as set out in our letter of 15-Apr-2021'. The response from TII on 15 April 2021 stated: (I) 'Official policy in relation to development involving access to national roads and development along such roads is set out in the Department of Environment, Community & Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012)'. Section 2.7 of the DoECLG Guidelines concerns development at National Road Interchanges or Junctions. The proposal, if approved, would create an adverse impact on the national road and associated junction and would, in the Authority's opinion, be at variance with the foregoing national policy.'

In response to the above TII observations, the local planning authority states;
The applicant is requested to set out how the proposed development is in accordance with the Department of Environment, Community & Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012). In particular, the applicant is requested to chronically detail the past uses on the subject site with reference to the design/construction timeline of the adjacent national road interchange.

In the following sections, this technical note demonstrates that the location and operational characteristics at Wilsons Auctions generates categorically no perceptible adverse impact on either the national road nor its associate junctions including Junction 2 on the N7 corridor. Accordingly, this technical note demonstrates how the subject site's continued use is in accordance with the

Department of Environment, Community & Local Governments 'Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012).

Key considerations clarified within this Technical Note;

2.0 Location Trip Generation,
3.0 Network Impact,
4.0 Network Analysis, and
5.0 Spatial Planning and National Roads Guidelines for Planning Authorities.
6.0 Previous Land Use and Construction Timeline of Adjacent National Road Interchange.

2.0 LOCATION AND TRIP GENERATION

LOCATION

Figure 2.1 illustrates the Site Access Road junction as located on Green Isle Road, a low volume 'local' classified road link. It is noted that the operational performance of this site access on Green Isle Rd junction is completely independent with absolutely no influence on the operational performance of the J2N7 western roundabout or the R136 as located to the west. With the low volumes experienced approaching the strategic road network junction via Green Isle Road (as highlighted in the results of the commissioned traffic surveys) combined with the low potential for increased vehicular trip generation along this local corridor (due to land zoning objectives), the distance and subsequent independent nature of the Site Access Road/Green Isle Road junction from the R136/Green Isle Road (JTC Location 2 in Figure 1.2 below) results in the Site Access Road junction having no impact or operational influence on the strategic road network or its juncitons.

Figure 2.1: Site Access Junction Location

VEHICLE GENERATION

In order to assess the operation of the subject Wilsons Auctions site and to quantify the existing traffic characteristics across the surrounding local network including Junction 2 on the N7 corridor (J2N7), DBFL commissioned a range of traffic surveys, including Automatic Traffic Count (ATC) surveys (capturing all vehicles accessing/egressing the subject site) as well as Junction Turning Count (JTC) surveys in August 2021 at the locations illustrated in **Figure 2.2** below.

Figure 2.2: Survey Locations

Table 2.1 below summarises the AM and PM peak hour vehicles trip generated by the current onsite operations at Wilsons Auctions as established by the August 2021 surveys. The surveys were purposely scheduled in a day that an auction was scheduled at the subject Wilsons Auctions facility. The surveys demonstrate that the existing operations generate very modest flows amounting to only 7 and 12 two-way vehicle trips in the AM and PM respectively.

	Time	Arrive	Depart	Two-Way
AM Peak Hour	(07:45-08:45)	5	2	7
PM Peak Hour	(16:15-17:15)	4	8	12

Table 2.1: Wilsons Ltd Peak-Hour Trip Generation (Tuesday 3rd August – During Auction Event)

Further details regarding the trip generation and attraction as well as a comparison of the current operations trip generation to that of previous operations on the subject site as conducted by Interbloem Flowers Ltd. are outlined in **Section 5.2** of DBFL TTA report : **2100128-DBFL-XX-XX-RP-C-001**.

3.0 NETWORK IMPACT

Based on the established trip generation/attraction levels, **Figure 3.1** below details the specific number of two-way vehicles that travel to/from Wilsons Auctions via the Green Isle Road and the two R136 roundabout junctions (N7 Junction 2) as result of the subject Wilson's operations. This enables the calculation of the specific scale of impact in regard to baseline vehicular traffic on the surrounding transport network to be established.

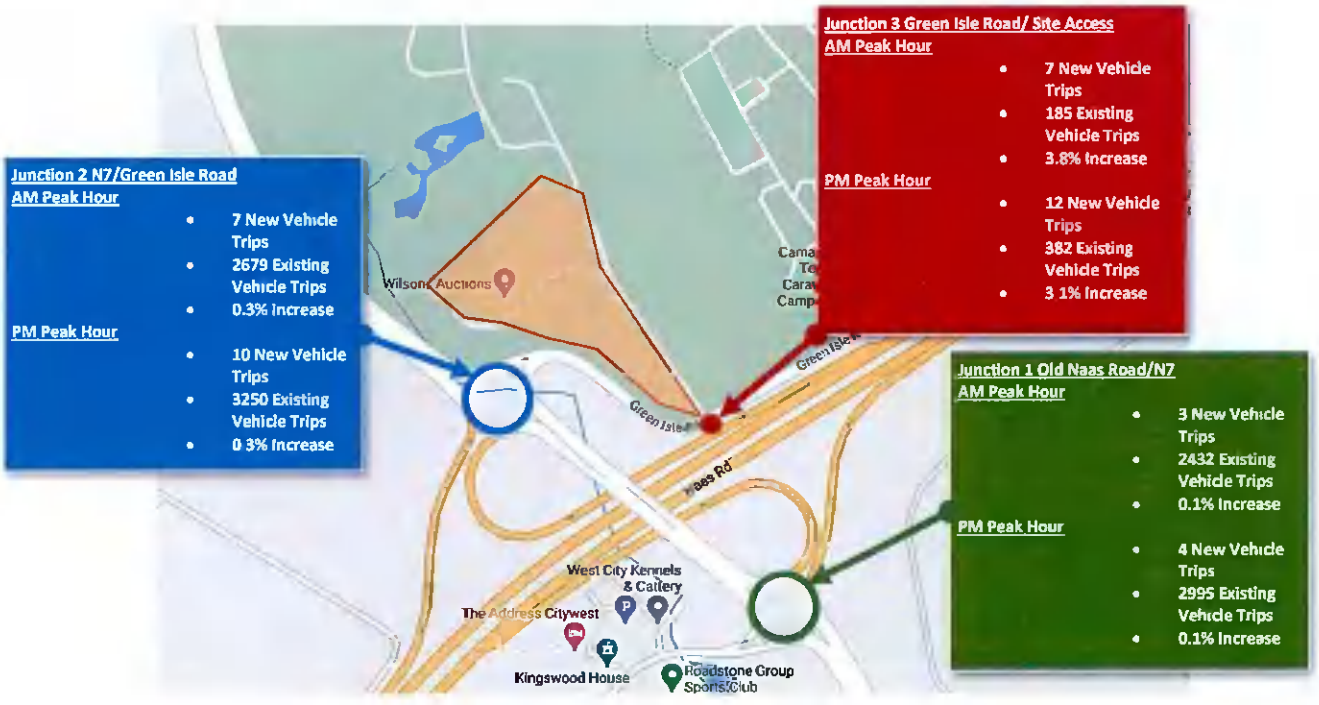

Figure 3.1 Actual Recorded Network Impact at Key Junction

The extremely modest scale of traffic movements recorded travelling to/from the Wilson's Auction site and associated scale of impact (0.1% and 0.3%) are established as being significantly below the advisory thresholds (5%) for 'congested' networks as defined in Table 2.2 of TII Publication, ***Traffic and Transportation Guidelines*** (May 2017) which serves as a supplement to the Department of Environmental, Community and Local Government's 'Spatial Planning and National Roads' Guidelines for Planning Authorities (January 2012). The TII guidelines state that a development is considered a material impact and thereby potentially a significant impact when the following thresholds are meet;

- 100 vehicle trips in/out combined in the peak hours for the proposed development
- Development traffic exceeds 10% of turning movement at junctions with National Roads.

- Development traffic exceeds 5% of turning movement at junctions with National Roads if location has potential to become congested or sensitive.

The actual extremely low level of vehicle trips found to be generated by the existing Wilsons operations on the subject and traveling through J2N7 have been found to generate the following imperceptible levels of impact;

- **Junction 1**: Eastern J2N7 Roundabout
  - Only **0.1%** (or 3 Vehicle-Trips) in the AM peak period, and
  - Only **0.1%** (or 4 Vehicle-Trips) in the PM peak period.

- **Junction 2**: Eastern J2N7 Roundabout
  - Only **0.3%** (or 7 Vehicle-Trips) in the AM peak period, and
  - Only **0.3%** (or 10 Vehicle-Trips) in the PM peak period.

Based on the above network impact assessment findings, it is categorially established that neither of the 2 off-site roundabout junctions that form the J2N7 interchange will experience traffic volumes (generated by Wilsons Auctions) that come anywhere close to any of the above TII threshold or even the 5% threshold (for congested roads) that is generally referred to as being 'material ' and subsequently requiring more detailed assessment. Nevertheless, detailed operational assessments of these two specific roundabout junctions has been undertaken in the following section using the Transport Research Laboratory (TRL) computer package Junctions 9 ARCADY detailed in the succeeding section.

4.0 NETWORK ANALYSIS

In order to determine if the operations at Wilsons Auctions site have any influence upon the operational performance of J2N7, a traffic model of the each of the interchanges two roundabouts (N7/Green Isle Road and Old Naas Road/N7) junctions has been analysed for the existing 2021 design year as well as a subsequent 2036 future network demand year (+15 years of traffic growth) in accordance with best practice and reference to TII's Travel Demand Projections.

As Wilson's Auction are currently in operation, the existing traffic recorded on the network was taken as the 'Do-Something' scenario. Vehicles recorded entering and exiting the subject Wilson's site (as surveyed by the ATC surveys recorded on Tuesday 3rd August 2021 – Auction Day) was deducted from the recorded data in order to calculate the corresponding 'Do-Nothing' network scenario.

R136 Junction/ Old Naas Road			AM				PM			
			Queue (PCU)	Delay (S)	RFC	LOS	Queue (PCU)	Delay (S)	RFC	LOS
2021	DN	Green Isle Road	0.80	4.28	0.43	A	0.80	4.28	0.42	A
		R136(East)	0.30	2.11	0.23	A	0.60	2.35	0.34	A
		Old Naas Road (South)	0.20	3.63	0.15	A	0.30	4.40	0.24	A
		R136(West)	1.00	2.83	0.47	A	1.70	4.00	0.60	A
	DS	Green Isle Road	0.80	4.29	0.43	A	0.80	4.28	0.42	A
		R136(East)	0.30	2.11	0.23	A	0.60	2.35	0.34	A
		Old Naas Road (South)	0.20	3.64	0.15	A	0.30	4.41	0.24	A
		R136(West)	0.10	2.83	0.47	A	1.70	4.02	0.60	A

Table 4.1: Junction 1 – 2021 Network Analysis

R136 Junction/ Old Naas Road			AM				PM			
			Queue (PCU)	Delay (S)	RFC	LOS	Queue (PCU)	Delay (S)	RFC	LOS
2036	DN	Green Isle Road	1.30	5.75	0.55	A	1.20	5.73	0.53	A
		R136(East)	0.40	2.39	0.29	A	0.80	2.78	0.42	A
		Old Naas Road (South)	0.30	4.24	0.19	A	0.50	5.57	0..32	A
		R136(West)	1.40	3.41	0.55	A	2.80	5.84	0.72	A
	DS	Green Isle Road	1.30	5.77	0.55	A	1.20	5.74	0.53	A
		R136(East)	0.40	2.40	0.29	A	0.80	2.78	0.42	A
		Old Naas Road (South)	0.30	4.25	0.19	A	0.50	5.58	0.32	A
		R136(West)	1.40	3.41	0.55	A	2.80	5.87	0.72	A

Table 4.2: Junction 1 – 2036 Network Analysis

Green Isle Road/ R136 Junction			AM				PM			
			Queue (PCU)	Delay (S)	RFC	LOS	Queue (PCU)	Delay (S)	RFC	LOS
2021	DN	Green Isle Road	0.10	4.21	0.10	A	0.30	6.34	0.22	A
		R136(East)	1.00	3.36	0.47	A	1.20	3.95	0.53	A
		Old Naas Road (South)	1.00	4.59	0.48	A	1.00	4.81	0.48	A
		R136(West)	0.90	3.11	0.44	A	2.10	4.98	0.66	A
	DS	Green Isle Road	0.10	4.21	0.10	A	0.30	6.40	0.23	A
		R136(East)	1.00	3.37	0.47	A	1.20	3.96	0.53	A
		Old Naas Road (South)	1.00	4.62	0.48	A	1.00	4.84	0.48	A
		R136(West)	0.90	3.12	0.44	A	2.10	5.00	0.66	A

Table 4.3: Junction 2 – 2021 Network Analysis

Green Isle Road/ R136 Junction			AM				PM			
			Queue (PCU)	Delay (S)	RFC	LOS	Queue (PCU)	Delay (S)	RFC	LOS
2036	DN	Green Isle Road	0.2	5.24	0.14	A	0.6	10.3	0.35	A
		R136(East)	1.4	4.1	0.56	A	1.9	5.21	0.63	A
		Old Naas Road (South)	1.7	6.51	0.61	A	1.7	7.05	0.61	A
		R136(West)	1.3	3.85	0.54	A	4.1	8.4	0.79	A
	DS	Green Isle Road	0.2	5.26	0.14	A	0.6	10.48	0.36	A
		R136(East)	1.4	4.11	0.56	A	1.9	5.24	0.64	A
		Old Naas Road (South)	1.7	6.57	0.61	A	1.8	7.11	0.62	A
		R136(West)	1.3	3.85	0.54	A	4.1	8.47	0.79	A

Table 4.4: Junction 2 – 2036 Network Analysis

In reference to the simulation results in the above 4 No. tables in regard to Junction 1 (Old Naas Road/N7) and Junction 2 (N7/Green Isle Road) it is demonstrated that comparing the finding between the 'Do-Nothing' (DN) and 'Do-Something' (DS) scenarios, the latter of which includes the traffic associated with Wilsons Auctions; it is demonstrated that the minimal level of traffic generated by Wilsons Auctions have absolutely no perceivable influence upon either of the two J2N7 roundabouts in either the 2021 or the long term 2036 design year scenarios. Accordingly, there is categorically no justification or evidence to suggest that the existing operations at Wilsons Auctions has any adverse impact upon the national road networks (J2N7) operational performance.

5.0 GUIDELINES FOR PLANNING AUTHORITIES

Spatial Planning and National Roads Guidelines for Planning Authorities require that valid planning applications are referred to the National Roads Authority where:

- *The development consists of or comprises the formation, laying out or material widening of an access to a national road (as defined in Section 2(1) of the Roads Act, 1993 (No. 14 of 1993))*
- *The development might give rise to a significant increase in the volume of traffic using a national road.*

As demonstrate in Sections 3 and 4 above in reference to actual quantifiable evidence, the Wilson's Auctions operations clearly **do not** classify as being considered a "*significant*" in terms of additional trips/travel, in direct reference to both (i) TII own thresholds, and (ii) the result of the junction simulation exercise.

Furthermore, due to subject site already being operational and developing its online auction presence, there is no concern in relation to the development involving physical changes to the surrounding national road network.

Accordingly, in reference to TII own thresholds for the definition of a 'significant' impact on the national road network, the subject Wilson Auctions operations clearly do not constitute a significant' impact and subsequently is in compliance with the requirements of the *Spatial Planning and National Roads Guidelines for Planning Authorities*

6.0 PREVIOUS LAND USE AND CONSTRUCTION TIMELINE

With reference to Appendix A, attached to this Technical Report, DBFL has made reference to the available information regarding the subject lands previous use as well as construction timeline.

- It is noted that in **1995** the site is evidently vacant with the existing access road servicing developments further north. In this situation the access road forms a junction with the national road (N7) being prior to the construction of the N7/R136 interchange. A Planning Application seeking to develop a horticultural glasshouse structure was granted permission on the subject site with reference **S95A/0409.**

- In the year **2000** there is evidence (as attached in Appendix A) that the horticultural glasshouse structures (Planning Application S95A/0409) have been developed. It is further noted that this is prior to the construction of the N7/R136 interchange, resulting on the site access road linking directly with the national road network. The site boundary has been adhered to accommodating the future development of the N7/R136 interchange.

- In **2005** a Planning Application (SD05A/1047) has been submitted and granted permission (06-09-2006) for the retention of the 2 No. glasshouse structures and one packaging shed by Interbloem Flowers Ltd. Furthermore, the N7/R136 interchange has been developed south of the subject site, removing the site access road from linking to the national road.

- In **2018** it is on record that Wilsons Auctions sought permission (for which it has been granted) for the retention of the 3 No. onsite buildings and associated external areas for storage and warehousing of motor vehicles, plant, and other durable products for sale. It is noted that Wilsons Auctions has occupied the subject site since and has since further reduced their level of traffic generation and attraction at the subject site by establishing an online auction presence, which has been promoted and made available as an option for all auctions conducted by Wilsons Auctions. In addition to this it is noted that the site access road operates in isolation to the national road network with the access road junction linked to a local low volume road.

7.0 CONCLUSION

Upon consideration of the findings of the traffic surveys undertaken, historic data collection and analysis summarised within this Technical Note report; DBFL have demonstrated that the scale of impact on the surrounding road network, as a result of the subject Wilson's Auctions existing operations is imperceptible.

This entirely evidence focused conclusion is based of the actual levels of vehicle flows generation by Wilsons Auctions and recorded travelling across the local road network and J2N7 roundabouts during the peak hour periods and the subsequent quantified levels of extremely low network impact established in reference to TII own thresholds for what constitutes a 'significant' impact.

DBFL conclude that the subject Wilsons Auctions operation will not in any way materially impact (i) the operational performance of the local road network nor the adjoining N7 Junction 2 roundabout junctions or (ii) existing road safety levels and thereby does not contravene the objectives outlined within *Spatial Planning and National Roads Guidelines for Planning Authorities*.

Accordingly, it is concluded that Wilsons' Auctions Ltd. will not result in a material deterioration of road conditions and as a result there are no significant traffic or transportation related reasons that should prevent the granting of Permanent Permission for Wilsons Auctions Ltd at the subject site.

APPENDIX A

Previous Land Use and Construction Timeline

APPENDIX A

1995

The subject site is vacant with the current access road servicing developments located further north. The site access junction links directly to the national road network (prior to the construction of the N7/R136 interchange).

Planning application S95A/0409 seeks to develop a horticultural, glasshouse structure on the subject site.

2000

Development of horticultural, glasshouse structures (Planning Reg. Ref. S95A/0409).

Planning approved, despite frontage onto a national road due to existing access road (as referred to in Inspector's report 1995 Appeal S95A.0409).

2005

Interbloem Flowers Ltd apply for retention of two no. glasshouse structures and one no. packaging shed (SD05A/1047) for which is granted permission for retention on 06/09/2006.

N7/R136 Interchange constructed, removing site access from national road completely and allowing site access junction to operate in isolation to the national road network.

2018

Wilsons Auctions sought permission for the retention of use of the 3no. existing buildings and all associated external areas for storage and warehousing of motor vehicles, plant, and other durable products for sale. Grant Permission for Retention was issued on 08/11/2018 after which Wilsons Auctions occupied the subject site.

The road providing access to the subject site is provided via a local, low volume street, operating without adversely