

MARSTON

PLANNING CONSULTANCY

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

25th April 2022

Our Ref. 22036

Re: Planning & Development Act 2000 and the Statutory Regulations made thereunder (as amended). Submission by Ballyboden Tidy Towns CLG, 17 Glendoher Close, Rathfarnham, Dublin, D16 N2Y0 in relation to a Strategic Housing Development application for a development comprising the demolition of Kilmashogue House and Coill Avon House, the construction of 178 no. residential units (houses, apartments and duplexes), a neighbourhood centre, creche and all associated ancillary development works at a site at Kilmashogue House and Coill Avon House, Whitechurch Road, Rathfarnham, Dublin 16

An Bord Pleanála Ref. TA06S.313059

Date of application: 21st March 2022

Five week period for observations ends: on or before end of 25th April 2022

Dear Sir / Madam

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18, are instructed by our clients **Ballyboden Tidy Towns CLG, 17 Glendoher Close, Rathfarnham, Dublin, D16 N2Y0**; to make the following submission to An Bord Pleanála in respect of this Strategic Housing Development application for approval lodged by BCDK Holdings Ltd. and Coill Avon Limited (the applicants in this case), for the above described development.

In accordance with the statutory regulations, we enclose payment to An Bord Pleanála for the appropriate statutory observation fee of €20. Our submission and the full reasons and considerations upon which this is based are set out below. We have also included with this submission the traffic assessment of the original application by Martin Peters and Associates (see Appendix A).

We confirm that the submission is made within the statutory five week period in accordance with the Planning and Development Regulations 2001 (as amended). We have inspected the subject site and examined the planning drawings and other particulars that form part of this Strategic Housing Development (SHD) planning application.

1. Overview

The SHD nature of this application on what are residential zoned lands requires the Board to consider this application in a thorough and comprehensive manner relative to the relevant local, regional and national policies.

It is not in question in this instance as to whether the principle of residential development is acceptable on the site given the zoning, nor is it in question that all planning policy at a local, regional and national level is pushing for higher residential densities at appropriate locations. However, we respectfully submit that in this instance the subject site is not an appropriate location for the proposed scale, height, density and layout proposed. The proposed development will be seriously injurious to existing residential amenity of adjoining residential developments (including those in close proximity to the subject site) and lacks access to high frequency public transport modes with adequate capacity, and must therefore be refused by An Bord Pleanála.

The subject site includes lands within the administration areas of both South Dublin County Council and Dun Laoghaire Rathdown County Council. Both were included within the preplanning consultations and the tri-party meeting with An Bord Pleanála relating to the proposed SHD development.

Noting that part of the site is within Dun Laoghaire-Rathdown County Council, we refer An Bord Pleanála to the fact that the new Dun Laoghaire Rathdown Development Plan 2022-2028 was adopted by the members on the 10th March 2022. The new statutory plan comes into effect, and into force on the 21st April 2022. This is during the time period in which An Bord Pleanála will be assessing and adjudicating upon the proposed SHD development.

Given this timing and that the Board will be making a decision on the SHD application based on the new Development Plan, their assessment must include whether the applicant has taken the correct approach to the zoning of the subject site, overall design, layout and scale of development within its local context; and whether policies and objectives of the new Dun Laoghaire Rathdown County Development Plan 2022-2028 (which will be adopted at the time that An Bord Pleanála will be assessing the proposed development as we note that An Bord Pleanála have identified that the case is due for decision by 11th July 2022) are being upheld by the proposal and that they are not in conflict with Regional and National planning policies.

The proposed development will in this instance be seriously injurious to existing residential and visual amenity of the area and is contrary to the zoning objectives of the subject site, the policies and objectives of the Dun Laoghaire Rathdown County Development Plan 2022-2028, the South Dublin County Development Plan 2016-2022 and the Building Height Guidelines and should therefore be refused by An Bord Pleanála.

Prior to outlining the detailed grounds for our client's observation it is useful that the context of this application is laid out before the Board.

2. Subject site and environs

The subject site is identified by the applicant as c. 6.77ha with the development site amounting to c.4.32 ha. The site is made up of two green field sites generally located to the west of Whitechurch Road and north of the M50, the SHD red line also includes part of the local road network connecting the two greenfield sites.



Extract from p.4 the Outline Construction Management Plan submitted with the SHD (CS Consulting)

In terms of land ownership the site includes:

- Two separate parcels of land in the ownership of the applicants, two separate land owners in this case who have come together to jointly submit this SHD application; and

- Lands in the ownership of Dun Laoghaire-Rathdown County Council and South Dublin County Council.

There are existing buildings within the site (which are not in use).

In general the overall site is bound by existing residential properties to the north; Whitechurch Road, the county boundary with Dun Laoghaire Rathdown administrative area, together with Marlay Park are located to the east; lands associated with Edmondstown Golf Club are located to the west; and the M50 to the south

In terms of watercourses, there is an existing stream within the site, the Whitechurch stream, a tributary of the River Dodder runs along the eastern boundary of the site. The northern portion of the site is heavily wooded along the roadside (Whitechurch Road) and a derelict bungalow is located on this part of the site; whilst a derelict farmhouse and some outbuildings stand on the southern portion of the site. It is noted that 35KV and 110 KV ESB lines traverse the subject site. For the purposes of the SHD application the documentation refers to the southern and northern lands, which relate to the two portion of lands shown on the previous page.

The characteristics of the northern lands are that they are heavily wooded adjacent to the roadside, through which the Whitechurch stream runs. There is a bridge across the stream at the site entrance providing access to a house on the neighbouring site. The land rises towards the rear of the site which is currently a broad overgrown meadow surrounding the existing derelict bungalow. The perimeter of this part of the site is characterised by mature hedgerows and trees. To the north-east of the site are two detached dwellings on extensive grounds.

The characteristics of the southern lands is that it is located at the road junction with College Road and Whitechurch Road with the M50 immediately to the south of the site. The lands are in agricultural use, under pasture interspersed with hedgerows and mature trees. The site slopes downwards towards the north and east. The slope over most of the site is gentle becoming a little steeper at the eastern part towards the site entrance. There is a derelict farmhouse and outbuildings within this part of the site. The northern boundary of the site adjoins other third-party farmland and there are stone structures within the site along this boundary.

The Whitechurch Road/ College Road junction adjoins the underpass beneath the M50 which connects with the Tibbradden Road and Kilmashogue Lane just south of the site. College Road to the east of the site, runs parallel to the M50 towards the entrance to Marley Park. There is a footpath on the western side of the Whitechurch Road connecting the two parcels of land.

Lands in the ownership of two Local Authorities:

Part of the application site include elements of the public road on Whitechurch Road and College Road. The SHD application includes works along Whitechurch Road to facilitate the delivery of a foul connection and water supply and junction improvements at the College Road intersection. Whitechurch Road is in the charge of South Dublin County Council (letter of consent included).

The site also includes lands in the ownership of Dun Laoghaire Rathdown County Council (letter of consent included) along College Road where it is proposed to provide a two way cycle lane as far as the junction with Marley Park.

Consideration of the South Dublin County Development Plan and the Dun Laoghaire Rathdown County Development Plan

The subject site includes lands within South Dublin County Council and a portion of land within the administrative area of Dun Laoghaire Rathdown County Council.

South Dublin County Development Plan 2016-2022

The lands are zoned 'Objective RES' – '*To protect and/or improve residential amenity*'. Under the 'RES' zoning objective, residential use is permitted in principle. Childcare use, restaurant/café and 'shop' units, which based on their internal floor areas, would fall under a shop-neighbourhood use as per Schedule 5 of the County Development Plan, would be open for consideration.

H3 SLO 1 Objective – South Dublin County Development Plan 2016-2022

The SHD site and wider area are subject to H3 SLO 1 which states the following:

“To facilitate the development of lands at Edmondstown (former Kilmashogue House) for the purpose of low-density residential development at a net density of not more than 12 dwellings per hectare, and to promote housing for older people (nursing home, independent and semi-independent) as a fully integrated part of such development with an increased density of not more than 20 dwellings per hectare to apply to independent and semi-independent housing for older people. All residential development, including housing for older people, shall be integrated within a sustainable residential neighbourhood that is served by shared public open space, community and local facilities. Permissible densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been fully resolved in an appropriate manner. Any future development should have regard to the boundaries with and the protection of the existing amenity and function of Edmondstown Golf Course”.

Commentary on H3 SLO 1

The proposed development does not comply with Objective H3 SLO1, it provides a density of c.40 units per hectare, in addition there is no specific reference to the provision of housing for older people – in the form of nursing home, independent or semi-independent living within the SHD. Having examined the SHD documents issues of accessibility have not been adequately addressed. It is considered that the proposed development does not comply with Objective H3 SLO1. We note that non compliance with this objective was a reason for refusal of a proposal under D19A/0105 in May 2019.

H9 Objective relates to Residential Building Heights it seeks:

“To direct taller buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme”.

Commentary on H9 Objective:

The heights set out in this SHD range from 2-5 storey, however the proposed development is not located within a town centre, on mixed use zoned lands nor within an SDZ nor part of an LAP or Planning Scheme.

Dun Laoghaire Rathdown County Development Plan 2016

The areas of land within the administrative area of Dun Laoghaire Rathdown County Council are located on land coloured white (unzoned). Marlay Park, located to the north of College Road is zoned ‘Objective F’ which seeks ‘to preserve and provide for open space with ancillary active recreational amenities’.

3. Recent Planning History

The planning history associated with the subject site relates to applications within South Dublin County Council. The planning history shows a series of refusals (from 2016 and 2019) relating to residential proposals for 42 and 62 no. dwellings. It is noted that the developments which were refused are in fact more modest in scale in comparison to the proposed SHD development, a summary of the planning history is as follows:

Planning History

South Dublin County Council Planning Reg. Ref. SD19A/0105 – REFUSAL 21 May 2019

Permission was refused for demolition of Coill Avon House, construction of 62 residential units consisting of 34 no. houses and 28 no. apartments and all associated site works.

In summary the reasons for refusal related to:

- material contravening of specific local objective H3 SLO 1 of the South County Dublin Development Plan,
- layout and design issues,

- removal of hedgerows and trees,
- no ecology or bat survey submitted,
- DMURS issues, and
- lack of detail relating to surface water and drainage.

SD06A/0826 / ABP Ref. 221017 – REFUSAL BY ABP on the 30 July 2007

An Bord Pleanála refused demolition of 1 no dwelling house and associated outbuildings and the construction of 42 no. houses, as well as the construction of vehicular access to Whitechurch Road and internal access roads and footpath and all associated site works. The Board in their refusal considered the proposal premature pending the determination of the Planning Authority of a road layout for the area.

Comments on the planning history:

Notwithstanding the fact that there is evidence of refusals for residential development of a scale which is more modest than the proposed SHD, we would draw the Board's attention to the scale of significant residential development that is either permitted or currently subject to planning within the area to the north and west .

4. Proposed development

The proposed SHD seeks permission for a mixed use development of 178 no. residential units, a creche and a neighbourhood centre. In summary this can be broken down as follows:

- 62 residential units are proposed on the northern lands.
- 116 residential units, neighbourhood centre and creche are proposed on the southern lands.

The proposed development comprises the demolition of Kilmashogue House and outbuildings and demolition of Coill Avon House and outbuildings. The application also includes the refurbishment and re-use of 2 no. stone existing outbuildings for community use, incorporated into an area of public open space within the southern lands;

The 72 houses will comprise 6 no. 2-bed houses; 45 no. 3-bed houses; and 21 no. 4-bed houses; that will comprise a range of 2.5 and 3-storey detached, semi-detached and terraced units. The 38 no. apartments and 68 no. duplex apartments are located across 7 no. buildings ranging in height from 3 to 5-storey as follows:

- **Block A/B:** 5-storey over basement and podium accommodating 10 no. 1-bed apartments, 16 no. 2-bed duplex apartments and 1 no. 3-bed duplex apartment with associated balconies/terraces;
- **Block C:** 5-storey over basement accommodating 4 no. 1-bed apartments and 8 no. 2-bed duplex apartments with associated balconies/terraces;
- **Block E:** 4-storey over basement accommodating 8 no. 1-bed apartments and 16 no. 2-bed duplex apartments with associated balconies/terraces;
- **Block S:** 3-storey accommodating 2 no. 2-bed duplex apartments and 1 no. 3-bed apartment and 1 No. 3-bed duplex apartments with associated balconies/terraces;
- **Block T:** 3no. 3-storey buildings accommodating 6 no. 1-bed apartments, 18 no. 2-bed duplex apartments, 9 no. 3-bed apartments and 6 no. 3-bed duplex apartments, all with associated balconies/terraces;
- **Neighbourhood Centre -Block A/B and Block C** are arranged around a landscaped podium. The neighbourhood centre is located below the podium, it includes a 2-level creche (c.313m²) at lower ground and ground floor level, and 3 no. retail/non-retail service/cafe units (c.470m²) at ground level;

- **The basement below Block A/B and Block C** includes 50 no. car parking spaces, bicycle parking, bin stores, plant and staff service area (80m²); and
- **The basement below Block E** includes 35 no. car parking spaces, bicycle parking, bin store and plant.

The proposal also includes the provision of link streets and works to the local road network (which are included within the red line area), these include:

- A section of link street with footpath and cycle path (approx. 438 linear metres) extending from the junction of Whitechurch Road and College Road on an alignment parallel to the M50, to provide access to the southern development lands and incorporating a bus turning circle;
- A new signalised crossroads junction to connect the proposed link street with Whitechurch Road and College Road;
- Upgrade works to College Road including a new two-way cycle track and relocated footpath from the Whitechurch Road junction to provide connectivity to the Slang River pedestrian/cycle Greenway;
- Upgrades to the existing vehicular access and bridge at the entrance to Coill Avon House on Whitechurch Road;

In addition the proposed development includes associated works:

- **Foul sewer drainage** works along Whitechurch Road from the southern lands to the existing junction at Glinbury housing estate;
- All landscaping, surface car parking, boundary treatments, infrastructure works, ESB substation, signage and associated site works and services.



Extract from the proposed site layout plan (noting this does not include the wider red line area). The M50 is located to the south of the subject site.

We note lack of detail and conclusions of the ecological and AA screening assessment that accompany the application. This includes inadequate bat surveys and otter surveys that fail to recognise the connectivity between the Wicklow Mountain SAC and the Whitechurch Stream. We note that the Whitechurch Stream connects to the Owendoher and Dodder River that is a feeding and commuting habitat for otters. This information is clearly set out in the Dublin City Council report dated August 2019 known as the *Dublin City Otter Survey : An Action of the Dublin City Biodiversity Action Plan 2015-2020*. The application, ecological survey and Appropriate Assessment submitted as part of the application completely fails to assess the impact of the proposed development on this important ecological habitat and biodiversity connection. In addition we note that the Appropriate Assessment fails to assess the impact of the proposal on the connection between the Wicklow Mountains, Whitechurch Stream, Owendoher River, Dodder River and its connectivity to Natura 2000 sites in Dublin Bay.

5. Grounds of submission

The full ground of our clients' submission together with the arguments, reasons and considerations upon which it is based is set out below. We respectfully submit that the proposed development, by nature of its scale, density, design and layout at this location would be seriously injurious to the amenities of the area and would be contrary to the proper planning and sustainable development of the area and should be refused.

First Phases of a larger development for Edmondstown lands

The wording within the executive summary (page 7) of the Design Statement prepared by JFOC would imply that the proposed SHD development is only part of an overall development strategy for the area referenced as the "Edmondstown lands", it states that:

*"The subject sites of this application form the **first phase of the development of the Edmondstown lands**, comprising approximately 20% of the residentially zoned lands. It opens up the opportunity to allow for the **future development of the balance of the lands** and for potential future connection from the Whitechurch Road to the Edmondstown Road. The development of this proposed site will be fully supported by the upgrade works to College Road and Whitechurch Road proposed as a part of the development."* (our emphasis).

The SHD application includes a Framework Plan which shows indicative proposals for lands in the wider area surrounding the proposed SHD lands. Our clients are extremely concerned in terms of the piecemeal and fragmented nature of the scale, height and layout of the proposed SHD development, its negative impact on the local traffic network and local road network, and in addition the suggestion that the area will be further impacted via the future development of the balance of the Edmondstown lands. Furthermore, the lack of a plan led approach to the development of these lands would seem to be contrary to best practice on such greenfield lands on the edge of the city.

Inadequate Car Parking Provisions and Negative Impacts on Local Road Network

The car parking provision was the subject of discussion at the pre-planning meeting with An Bord Pleanála, South Dublin County Council and Dun Laoghaire Rathdown County Council. The records of the meeting which took place on 3rd February 2021 reveal that there were concerns from the Planning Authorities in relation to the location of the proposed development and the quantum of car parking proposed. The minutes identify that the Planning Authority (which in this case it is assumed is South Dublin County Council) referenced that the "*proposed scheme will be very car dominant.*"

This SHD application provides 289 no. car parking spaces within basement levels and surface levels (as set out in the schedule of accommodation prepared by JFOC Architects:

- Residential – 218 spaces
- Neighbourhood centre- 16 spaces
- Creche/staff – 5 spaces
- Visitor basement – 17 spaces
- Visitor surface – 33 spaces

We note that the site notice does not set out the full quantum of car parking within the subject site. It is considered misleading in nature. Irrespective of the Planning Authorities concerns there is a significant

under provision of car parking within the subject site. Whilst public transport services are available they are sufficiently far away and over-subscribed to make it not sufficiently attractive to a significant proportion of the future population of the proposal.

The addition of 289 no. car parking spaces at this location will place increased traffic demands on the local road network in the vicinity of the subject site which will be severely negatively impacted by the introduction of traffic arising from the proposed development.

Furthermore, the capacity of the local and wider road network to absorb additional traffic must also be questioned given the extent of planned and permitted development within the wider area. No evidence has been provided to show that the public transport services has capacity once all or any of the committed and proposed developments have been completed. This needs to be considered fully before planning permission can be granted, and as no such assessment is provided must lead the Board to refuse permission in this instance.

In addition our clients are extremely concerned that the traffic analysis associated with this development has failed to consider the cumulative impacts of recent and pending SHD developments in the vicinity of the subject site. This is an important omission from the proposed development.

Non-compliance with the Urban Development and Building Height Guidelines

The Urban Development and Building Height Guidelines (2018) promote higher densities but caution that where higher densities are proposed due regard must be given to the locational context, availability of public transport services as well as capacity and other associated infrastructure. It is notable that the applicant does not identify this policy breach as a material contravention in this instance, with no reference to Housing (H) Policy 9 Residential Building Heights. This is a severe flaw in the application, and requires the Board to uphold this policy and refuse permission in this instance.

The applicant makes a case under this application that the site's proximity to public transport services, and despite this there are no detailed consideration of the capacity within the existing public transport provision. However, there is reference within the Planning Report prepared by Kent Doyle, the Design Statement prepared by JFOC and the Traffic Impact Assessment prepared by NRB Consulting that state that as a result of increased demand from new development that this will stimulate new public transport provisions.

We refer An Bord Pleanála to the information set out in the SHD application relating to the subject site's poor location in terms of public transport (the closest bus stop is c.1.3km-1.4km away) as well as the reference within the Design Statement to the potential future provision of future public transport investment in the form of extension of services based on demand generated by this development as well as others. There is no policy that supports this conjecture on behalf of the applicants.

There is no analysis of the capacity of the existing public transport provision within the SHD documentations. The approach and arguments put forward within the SHD relating to the proposed quantum of development and the subject sites proximity to public transport is misguided and does not comply with the proper planning and sustainable development of the area.

The Planning Report p.6 presented with the SHD application sets out the following in relation to public transport:

*"The closest accessible bus stop to the subject lands is located at Whitechurch Green, which is between **1.3 and 1.4 km c.14-16-minute walk** from the site access roads (southern and northern character areas). This bus stop is currently served by several routes including: Dublin Bus Route 15d, 61, 116, Go Ahead Bus Route 161*

*Further north there is an existing bus stop located on Taylors Lane which is **c.18- 20-minute walk** from the site. In addition, this bus stop also serves the GoAhead Bus Route 175 (Citywest - UCD).*

Along Edmondstown Road the bus stop serves the Go Ahead Bus Route 161 and Dublin Bus Route 61.

*Light Rail: The closest Luas Station to the subject site is Ballaly Luas Station, **approximately 4.5 kilometres** from the subject site. A connection via bus to/from Ballaly Luas Station is currently provided in the form of the Dublin Bus Service Route 116, while Dublin Bus Service Route 61 provides a connection to/from Dundrum Luas Station (approximate 5.0 kilometers from site).” (our emphasis)*

The Design Statement prepared by JFOC Architects (page 22) acknowledges the capacity issues and current constraints in terms of the current public transport network, and states:

“In terms of Public Transport / Bus availability in the short term, with the anticipated significant increase in demand for bus services associated with the development, it is sensibly expected that a commercial demand will exist for Dublin Bus/ NTA to extend the Whitechurch Area Bus Services to serve the lands (or an alternative as deemed appropriate). The location of the under- construction DLRCC St Thomas Regional Sports Campus on the south side of the M50 at Tibbradden supports this. Clearly, the anticipated resulting demand of any new residential development combined with a Regional Sports Campus would make the logical extension of the current bus services a viable proposition. To this end NRB have designed the link street with a dedicated turning and waiting area for a Bus Service”.

We note that the net residential density of the proposal is c. 41 units per hectare and amounts to a serious overdevelopment of the site with no serious or appropriate transition in scale to adjoining residential areas.

It is imperative that the Board consider this SHD and other developments in a cumulative manner in relation to public transport and its capacity to serve an area. The recent decision by Justice Holland in the High Court case relating to another SHD application between *Ballyboden Tidy Towns Group v An Bord Pleanála, The Minister for Housing, Local Government and Heritage, Ireland and the Attorney General ((2022) IEHC 7, Record no. 2020/816JR* concluded that public transport capacity is an intensely practical issue. The judgement states that section 3.2 of the Building Height Guidelines sets public transport capacity as its very first criterion that *“The site is well served by public transport with high capacity, frequent service and good links to other modes of transport.”*

The judgement states that they considered *“capacity and frequency”* as distinct concepts. Whilst capacity is related to frequency, they are clearly not the same thing, as Judge Holland found under the above judgement. In his judgement he states that if buses are frequent, it is no consolation to the commuter standing at peak hour on the way to or from work at a bus stop at which buses pass every 15 minutes or more frequently if all are already full, or even if the first two are full. In order to assess public transport capacity at a bus stop serving the site requires information not merely as to the frequency of buses but as to how full or empty the bus will probably be arriving at the bus stop and how many people must be presumed to be standing at that bus stop already before you build the proposed development.

Whilst it clearly is not possible to get perfect information in regard to capacity issues, we refer the Board to the point that was made in *O’Neill v An Bord Pleanála and Ruirside Developments (2020) IEHC 356 s157 et seq*, in which an objector stated, one of many to similar effect, *“that she has to be on the bus by 7.30am to get to work for 9am because, if she leaves it any later, the buses travelling into the city centre are already full by the time they pass...”*. We respectfully submit that there are worse concerns in this instance given the lack of any local public transport and the poor quality of the footpaths along parts of Whitechurch Road. Although notably none adjoining the application site. The applicant has failed to consider these in making the SHD application.

It is considered in the case of this SHD that the applicant has identified a series of bus stops, c.1.3km (14-16 minute walk), a further stop 18-20 minutes away and a LUAS c. 4.5km. However the applicant has made no reference to the capacity of the existing public transport, irrespective of the long distance to these stops. We respectfully submit that such unreliability of actually getting onto a bus or other form of public transport is a recipe for car dependency – a considerable concern of the planning authority and Government policy as outlined within Ministerial Guidelines, RSES and NPF. This is a particular concern, both in terms of pushing future residents towards car use, but also due to the car parking being proposed in this instance. There is a need for balance when considering all proposals, and it is clear that the balance between density of development, car parking provision and public transport capacity is wholly incorrect and imbalanced in this instance. We note that at the pre- planning consultation stage of the Planning Authority were concerned that the proposal was a car dependent proposal.

We refer to the quoted reference from the SHD relating to future public capacity (quoted at the beginning of this section), however it is clear that the Board should make its decision in relation to public transport based on current capacity rather than any future potential plans to improve public transport services. Indeed the applicant failed to adequately consider the issue of capacity in making the SHD application.

We respectfully submit that the proposed development constitutes a significant overdevelopment of the subject site. The proposed development fails to integrate into this mature residential area. This is contrary to the zoning of these areas and SPPR3 of the Building Height Guidelines.

It is our considered opinion that SPPR3 cannot be successfully applied in this case due to the fact that the proposed development is completely out of character with the adjoining built environment (which includes stand alone dwellings of 2 storeys) within the surrounding areas. The proposal seeks a form of development that clearly does not reflect the scale of the neighbourhood and surrounding streets that is a specific requirement of SPPR 3.

The nearest 5 storey buildings are a significant distance away and there is no built development nearby or within the local context that provides any form of justification for the current proposal. This amounts to a clearly development led proposal that has absolutely no regard to its context.

We respectfully submit that the proposal will be overbearing from all sides and the negative impact on the visual amenity on the surrounding properties and area will be significant. The design, scale and massing of the proposal is completely unjustified and will negatively impact upon the visual amenity of the area.

The applicant seeks to justify the proposal breaking the densities and type of development identified in H3 SLO 1 of the South Dublin County Development Plan and policies for the site purely based on Policy SPPR 3 and 4 of the Guidelines and that the aim to increase residential density and building heights is a *carte blanche* for applicants to not consider its context – this is clearly not the case under SPPR3. We respectfully submit that the applicant's opinion is misguided and incorrect in this instance.

Whilst we acknowledge that Policy SPPR 3 of the Guidelines remains in force and does allow the Board to approve a development that is contrary to a policy and objective of the County Development Plan, this can only happen where it is proven unequivocally that the set of criteria under section 3.2 of the Guidelines are met. It is our considered opinion that these are not met in this instance for the following reasons:

Proposal fails to be at the scale of the relevant city/town

The critical matter for the Board to consider in this instance, given reasonable public transport connections (although significant questions in relation to capacity as already outlined), is whether the proposal successfully integrates into and enhances the character and public realm of this area.

The proposal will be over-dominant; be overbearing; and result in an excessive density and massing of development on the subject site which is contrary to H3 SLO 1 of the South Dublin County Development Plan. We request the Board to reach a conclusion that the proposal fails to address and be at an appropriate scale and design that will integrate into the character of the area. The form of development, scale, height and massing of the proposal is contrary to the proper planning and sustainable development of the area.

At the scale of district/ neighbourhood/ street

There are no objective planning grounds for claiming that the proposal is at a scale that contributes positively to the urban neighbourhood and streetscape of this ostensibly rural / edge of city location. The proposal has a highly bulky, dominant and austere form when viewed from surrounding areas. The fact that the proposal seeks to develop a currently underutilised site within an urban location inside the M50, utilising the criteria set out in the Building Height Guidelines, does not give the applicant *carte blanche* to overdevelop the site. The proposed height, design and form of the proposal fails to address the scale of the street and neighbourhood (this is abundantly clear from viewing the elevations and sections submitted with the SHD planning application including those referenced above). It is unclear what the rationale is for the applicant to claim that the proposal will somehow have a positive impact on the site and streetscape.

At the scale of the site/building

The proposed development has also failed to address the appropriate scale and mass of development on adjoining sites/the local road network. The proposed development will engulf the existing buildings and will result in a form of development that will dominate the existing residential properties.

The proposed development has blatantly disregarded the need to safeguard the existing residential and visual amenities of adjoining residential property that sought to safeguard the proper planning and sustainable development of the area.

Removal of Trees and Hedges

The SHD includes an Arborist Assessment report prepared by Felim Sheridan dated 10th December 2021. The SHD application was submitted to An Bord Pleanála in March 2022. This identifies a number of trees to be removed as part of the proposal that will further denude this rural environment. The report identifies that to accommodate the proposed development 31 trees will be removed along with 3 hedgerows and c.90 m of other hedgerows. This is contrary to the provisions of the South Dublin County Development Plan.

Noise Report Inadequacies

A Noise report prepared by AWN was submitted with the SHD application. Section 4.2.2 of the report sets out the dates of the noise surveys undertaken. The surveys were conducted in September and October 2020. The report acknowledges that traffic on the M50 was not “normal” due to reduced traffic flow and activity in the immediate area arising from Covid 19 measures. The noise report states on page 12 that:

“In order to allow for robust assessment, it has been assumed that a 50% reduction in traffic flows is prevalent surrounding the development site during the noise survey. A correction of +3dB will be added to measured noise levels for the purposes of the façade assessment”. (our emphasis)

The specific reason for the selection of a level of +3dB has not been justified in this particular case. In terms of the perception of noise a change of +3dB is just perceptible to the human. We would query this addition to the noise survey results and would suggest that the addition of a higher dB value may be more appropriate in this case given the timing of the surveys and the results arising. Overall, due to the timing of the surveys which were undertaken in autumn 2020 we would question the accuracy of the noise surveys overall.

We have serious concerns that the baseline noise level has not been accurately presented, as a result the data presented to the Board as well as the noise mitigation measure are not accurate, representative of normal traffic levels on the M50 nor adequate in the case of the proposed development, given the proximity of part of the site to the M50. An Bord Pleanála will note that the southern portion of the subject site is located in immediate proximity to the M50 therefore there are concerns in this case in terms of the robustness of noise mitigation measures at this location.

Drainage

There is currently no foul sewer connections to this site. The application proposes foul sewer drainage works along Whitechurch Road from the southern lands to the existing junction at Glinbury housing estate some 900m to the north. The validity and ability to use these for the current application must be severely questioned by the Board. This is even more relevant given that Ringsend Waste Water Treatment Plant is operating at or above capacity, and the delay in the Greater Dublin Drainage Scheme.

Screening for Environmental Impact Assessment

It is noted that the SHD application includes a Screening for Environmental Impact Assessment. We refer An Bord Pleanála to the recent judgment by Justice Humphrey on 10th May 2021 in *Waltham Abbey Residents Association v An Bord Pleanála & Ors*¹ which referred matters relating to screening for Environmental Impact Assessment. We refer An Bord Pleanála to the list of items that should be considered as part of the screening exercise as set out in paragraph 22 of the judgment. The screening report submitted as part of the proposed SHD development should be scrutinised in this regard.

¹ [2021] IEHC 312

Screening for Appropriate Assessment

The application includes a Screening Report for Appropriate Assessment of the proposed development undertaken by Openfield Ecological Services and dated March 2022. This Screening Report, despite the fact that the Whitechurch Stream runs through the proposed site, fails to recognise the connection between the Wicklow Mountains SAC and the Whitechurch Stream, which is used by otters. This failure must draw into question any of the conclusions of the Screening Report.

Negative Impact on Property Values

The proposed development will have a negative impact on the value of properties adjoining the boundaries of the subject site given the proximity of the proposals to the boundaries of the subject site, the proposed heights and the profound overbearing nature of the proposed development, the decrease in light, privacy, significant loss of residential amenity which will occur as a consequence of the proposed development.

Other items for consideration

Wording of the Statutory Notice (Site Notice relating to the proposed SHD development)

We refer An Bord Pleanála to the wording of the statutory notices in this particular case which state the following:

*“The application contains a statement setting out how the proposal will be consistent with the objectives of the **South Dublin County Development Plan 2016-2022 and the Dun Laoghaire Rathdown County Development Plan 2016-2022.**”*

The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land”. (our emphasis)

The subject site is made up of lands in the ownership of the applicants (2 portions of lands) as well as lands in the ownership of South Dublin County Council and Dun Laoghaire Rathdown County Council. We refer An Bord Pleanála to the fact that there is no reference within the site notice to the new Dun Laoghaire County Development Plan. The statutory notices are dated **21st March 2022**, the SHD application was lodged on **21st March 2022**. The new Dun Laoghaire Rathdown Development Plan 2022-2028 was adopted on **10th March 2022**. The new plan comes into effect on **21st April 2022**. This is during the public display period as well as being during the time period in which An Bord Pleanála will be assessing and adjudicating upon the proposed SHD development at the subject site which is within the administrative area of Dun Laoghaire Rathdown County Council as well as South Dublin County Council. This we consider opens up this particular SHD to legal scrutiny and potential legal challenge in the future.

Non-compliance of certain SHD drawings with Planning & Development Regulations 2001 (as amended) – Wayleaves not shown on the Site Location Plan(s)

A drawing by CS Consulting Group (drawing no. EDM-CSC-CF-XX-DR-C-0038) is submitted with the SHD application. This is entitled “*Wayleave Areas over water, foul and storm services*”. The legend denotes that the areas on the drawing shown in yellow with a black hatching are “*wayleave areas to be provided to SDCC and Irish Water over storm, foul and watermain services.*”

However, there are no wayleaves shown on the series of site location maps prepared by JFOC Architects. This is contrary to Article 22 (2)(b) of the Planning and Development Regulation 2001 (as amended) which relates to the inclusion of wayleaves in yellow on site location maps. This we consider opens up this particular SHD to legal scrutiny and potential legal challenge in the future.

Red Line and Ownership

The SHD has been submitted in the names of “*BCDK Holdings Ltd. and Coill Avon Limited*”. Throughout the SHD documentation there is reference to the fact that the two portions of land where the build elements of the proposal are to be provided are in the ownership of two separate entities. There is no explanation as to why the landowner in this case have submitted a joint SHD application at the subject site nor is there

evidence of how the SHD development will be managed and how the proposed phasing will be achieved given the fact that the applicants are two separate land owners.

There is evidence that this issue was raised at the tri-party pre planning consultation stage with An Bord Pleanála, the board recommended that:

*“Further clarity will need to be required in relation to single/dual land ownership, compliance must be demonstrated at application stage as **one legal entity holds responsibility in relation to matters such as phasing and management**”. (our emphasize, extract from An Bord Pleanála Record of the meeting 3rd February 2021, page 4).*

The applicants have failed to address this within the SHD planning application documentation.

6. Conclusion

We respectfully submit that the applicant has failed to adequately address the concerns of our clients in terms of respecting the appropriate density and building heights that the subject site should be developed at; and furthermore the proposal materially contravenes Policy H3 SLO 1 of the South Dublin County Development Plan and should be refused on that basis. It is clear that Policy H3 SLO 1 sets out a clear vision for the overall Edmondstown lands that are completely ignored by the proposal. It is notable that the applicant indicates this policy breach as the sole material contravention in this instance, with no reference to Housing (H) Policy 9 Residential Building Heights or other material contraventions in terms of density etc.

The piecemeal approach to the development of these unco-ordinated sites must be severely questioned. This approach to land use planning is particularly inappropriate on sites such as these that whilst zoned for development, are located on the periphery of the city and at the boundary between the city and the Dublin Mountains. There are significant constraints to the site that the applicant has not adequately addressed in terms of loss of mature trees; the lack of capacity within the local road network and the impact upon local biodiversity including the Whitechurch Stream. Quite simply the site does not have adequate capacity to absorb the level of piecemeal development being proposed in this instance.

The proposed development is a prime example of a poorly located SHD development which results in a proposal that would result in an overdevelopment of the subject site negatively impacting on the residential and visual amenity of the area.

We respectfully submit that when considering all elements of this SHD application it is incumbent on the Board to conclude that the proposal reflects a massing, design and layout that has not addressed or respected the site or its context. Policy H3 SLO1 of the County Development Plan is not only specific in terms of density but also in terms of the nature of the residential use being proposed. The applicant has failed to address this under their Material Contravention Statement as there is no considered and evidence based assessment of the need for housing for older people in the form of semi-independent living units under the SHD application. This is a significant and fundamental flaw of the application. In the same way that the need for educational and crèche needs must be considered in an informed manner, so should the need for housing for the elderly. The failure of the applicant to even consider this is reasonable and strong grounds for the refusal of the application.

In this instance, the proposed mass, height and density of the proposal cannot be justified and would be contrary to the proper planning and sustainable development of the area. We respectfully request the Board based on these considered and objective planning arguments to refuse permission in this instance.

We trust that An Bord Pleanála will give due consideration to all matters raised in this submission and request that planning permission be refused for the proposed development.

Yours faithfully,



Anthony Marston (MIPI, MRTPI)
Marston Planning Consultancy

Appendix A – Technical note on traffic and transportation considerations



TECHNICAL NOTE (TN01 – Traffic and Transport Considerations)

Edmondstown Lands SHD Objection

Land West of Whitechurch Road

Rathfarnham

Dublin 16

Prepared By:

Chris Miles BSc (Hons), CEng, MICE, MCIHT, CMILT

Checked By:

Richard White BSc (Hons), MSc, CMEngNZ, MCIHT, CMILT

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1.0 INTRODUCTION

1.1 Background

- 1.1.1 This Technical Note has been prepared by MPA Consulting Engineers on behalf of Ballyboden Tidy Towns CLG. It relates to the proposed Strategic Housing Development (SHD) on two parcels of land to the west of Whitechurch Road, Rathfarnham, Dublin 16.
- 1.1.2 A planning application has been submitted to An Bord Pleanála (Case Number: TA06S.313059) by BCDK Ltd and Coill Avon Ltd in accordance with the Planning and Development (Strategic Housing Development) Regulations 2017. The scheme comprises 178 residential units together with three retail / non-retail / café service units and a crèche,
- 1.1.3 Ballyboden Tidy Towns CLG object to this proposed development. This Technical Note provides a critical assessment of the proposed scheme (and the information submitted by BCDK Ltd and Coill Avon Ltd) from a traffic and transport perspective.
- 1.1.4 The application documents contain information dealing with the potential impacts of the proposed development in relation to the following traffic and transport related issues:
- Site Access;
 - Parking and Servicing;
 - Trip Generation and Distribution;
 - Operational Capacity; and,
 - Road Safety.

1.2 Site Location

- 1.2.1 The site is located on the southern outskirts of Dublin in the Rathfarnham area of the City. It is divided into two separate elements with both being to the west of Whitechurch Road (L4020) and close to Kilmashogue Bridge where the M50 Motorway passes over Whitechurch Road.
- 1.2.2 Whitechurch Road to the north passes Edmondstown before meeting the R113 Taylors Lane at a signal-controlled junction. The R113 heads west and after approximately 2.75km connects with the M50 Motorway at Junction 12. It also heads east becoming Brehon Field Road and after approximately 3.2km connects with the M50 Motorway at Junction 13. The M50 forms the strategic orbital route around the western suburbs of Dublin and connects with the various radial routes in and out of Dublin City Centre.
- 1.2.3 College Road forms the side arm of a priority (yield) junction with Whitechurch Road in the vicinity of the southern element of the proposed site. It leads east towards Marley Park and the R822 Grange Road which in turn connects to Brehon Field Road and beyond to M50 Junction 13.
- 1.2.4 The location of the site in relation to the surrounding highway network is shown in **Figure 1.1** and **Figure 1.2** overleaf.

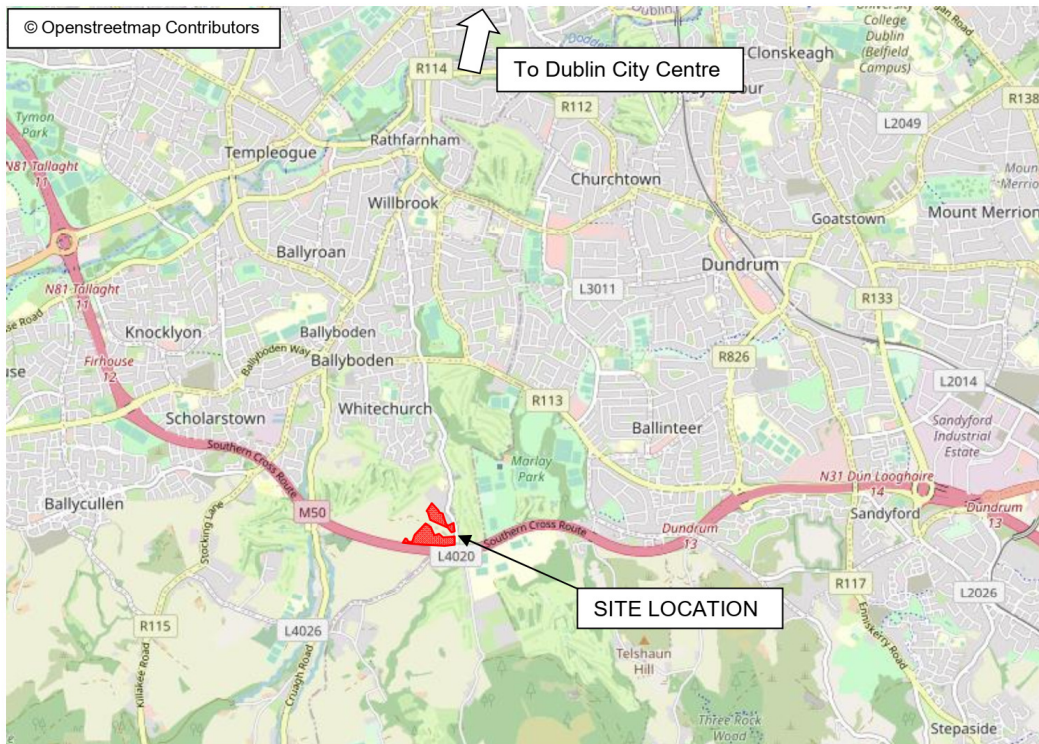


FIGURE 1.1: Site Location (Strategic)

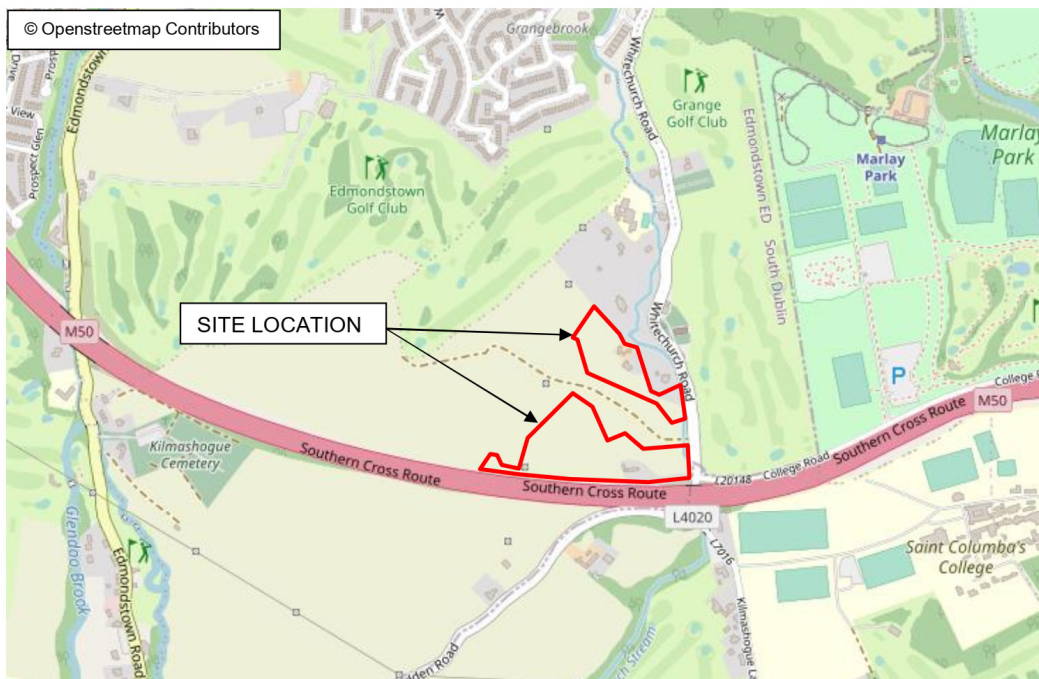


FIGURE 1.2: Site Location (Local)

2.0 PROPOSED DEVELOPMENT

2.1 Land Use Mix

- 2.1.1 The proposed development involves the demolition of most of the existing buildings on both elements of the site and the construction of a residential led mixed-use development of 178 residential properties together with a crèche (313m²) and 3 No. retail / non-retail / café units (total 470m²).
- 2.1.2 The northern portion of the site would provide 28 houses and 24 apartments / duplex while the southern portion of the site would provide 44 houses, 82 apartments / duplex and the non-residential aspects of the proposals. The overall housing mix would comprise 6 No. 2 bed units, 45 No. 3 bed units and 21 No. 4 bed units while the apartment / duplex mix would comprise 28 No. 1 bed, 60 No. 2 bed and 18 No. 3 bed units.

2.2 Access and Layout

- 2.2.1 Vehicle access to the northern element of the site is proposed via a simple yield junction from Whitechurch Road with associated pedestrian footpaths.
- 2.2.2 Vehicle access to the southern element of the site is proposed by converting the existing Whitechurch Road / College Road yield junction into a traffic signal-controlled crossroads with the new fourth arm acting as the access to the development. In the longer term, the new fourth arm is also proposed to act as part of a longer link road that is planned to connect Whitechurch Road with the R116 Edmondstown Road to the west. It should be noted that the proposed development would provide only the first approximately 400m (approximately 30%) of the full link road meaning the development would be fully reliant on Whitechurch Road and College Road for access until such time as the link road is completed (by others).
- 2.2.3 Controlled pedestrian / cycle crossings of all four arms of the signalised crossroads would be incorporated into the phasing of the proposed traffic signals with these identified as being direct crossings, i.e. requiring an 'all red' traffic stage to cater for the pedestrian and cycle movements.
- 2.2.4 The northern site layout consists of an initial link serving a loop road that runs around the residential elements. A pedestrian footpath connects Whitechurch Road into the main body of the site but for the most part there are no footpaths beside the loop road element.
- 2.2.5 The southern site layout is orientated around the future east-west link road with 2 cul-de-sacs and a loop road taking access from it via simple yield junctions (4 No. in total). Various pedestrian routes run through the site before connecting to new pedestrian and dedicated cycle paths beside the future link road. These in turn extend to the proposed signalised junction with Whitechurch Road.

2.3 Parking

- 2.3.1 The development proposes the provision of 289 car parking spaces overall. These will consist of 218 for the residents, 66 for visitors and 5 for the non-residential land uses. The development also proposes 635 cycle parking spaces comprising 493 for the residents, 138 for visitors and 4 for the non-residential laned uses.

3.0 NON-CAR ACCESSIBILITY

3.1 Pedestrian and Cycle

- 3.1.1 The existing non-car accessibility of the proposed site is discussed within the Transportation Assessment Report (TAR) submitted in support of the application.
- 3.1.2 It is acknowledged that a continuous footpath links the two elements of the site north towards Edmondstown and Taylors Lane. The standard of this footpath is not discussed within the TAR other than the author stating that it allows for the safe passage of pedestrians between the site and the surrounding areas and facilities.
- 3.1.3 This statement is considered false as the footpath is of a variable width along its length and does not always allow two pedestrians to pass without one stepping into the adjacent carriageway. Similarly, it does not always allow sufficient width for a wheelchair or pram / pushchair. A case in point is approximately 100m south of the Whitechurch Road / Whitechurch Green roundabout where the footpath reduces to approximately 0.6m in width (see image below).



- 3.1.4 There are also many other locations along its length where the footpath width is restricted by telegraph poles, bollards, stone pillars or the adjacent boundary wall. The footpath route does not appear comfortable for pedestrians as they are frequently confined on a narrow footpath width by traffic on one side and by a high stone wall on the other (see image overleaf).
- 3.1.5 It is considered that the standard of the existing Whitechurch Road footpath between the two elements of the site and the Edmondstown area to the north is poor and will not provide a convenient and attractive pedestrian route. Without a high standard pedestrian route, there are unlikely to be a high number of pedestrian movements to and from the site which in turn is likely to increase the number of trips made by car.



- 3.1.6 A footpath is also available beside College Road linking east towards Marlay Park and Grange Road. This is of a reasonable standard but again may be intimidatory for pedestrians given the high stone wall at the back of the footpath on one side and the edge of carriageway on the other.
- 3.1.7 There are no cycling facilities along Whitechurch Road at present with cyclists simply sharing the carriageway with vehicles. It is however proposed that advisory cycle lanes be provided along the southern section to link the two elements of the site most of the way towards the Whitechurch Road / Whitechurch Green roundabout. The introduction of advisory cycle lanes is considered inappropriate and unsafe.
- 3.1.8 The TAR identifies Whitechurch Road as having an average carriageway width of 5.95m with locations where this width narrows to 5.2 – 5.3m. It also acknowledges that these widths are edge to edge with verge creep removed to maximise the measured width. The effective width of the carriageway is however less than that measured as the stone walls tight to the carriageway edge in some locations result in vehicles travelling a distance away from the edge to avoid the risk of knocking wing mirrors or similar. This in turn creates unused elements of the carriageway surface which is evidenced by the verge creep that has occurred over time.
- 3.1.9 The road also has a sinuous alignment with relatively tight bends and poor forward visibility in some locations caused by the high stone walls on the inside of the bends. This has resulted in the use of a single white line road marking along its length to ensure appropriate lane use and to warn drivers against over taking.
- 3.1.10 The width and alignment of Whitechurch Road makes the use of advisory cycle lanes inappropriate. The extract from the National Cycle Manual provided as Figure 5.11 of the TAR recommends cycle lane widths of 2.0m in both directions and a minimum retained carriageway width of 4.0m. These dimensions suggest that advisory cycle lanes are not appropriate on roads less than 8m wide which Whitechurch Road clearly is.

- 3.1.11 This was picked up within the Stage 1 Road Safety Audit that forms an Appendix to the TAR where the auditor identified that Whitechurch Road has a narrow carriageway and that the advisory cycle lanes would not leave enough room for cyclists and vehicles. The lane markings could also be confusing resulting in the appearance of four narrow lanes. The resulting recommendation from the auditor was to remove the centre line road marking and to provide the advisory cycle lanes with red surfacing.
- 3.1.12 Given the sinuous alignment of Whitechurch Road and the poor forward visibility in places, removal of the existing centre line is considered detrimental to road safety. It is noted that the designer's response to the Road Safety Audit accepts the auditor's recommendation but caveats the response by saying 'subject to approval by DLRCC' (sic). This suggests the designer has doubts over the ability to remove the centre line and therefore the overall practicality of providing advisory cycle lanes at all.
- 3.1.13 Notwithstanding the above, it should also be noted that advisory on-road cycle lanes provide no physical protection for cyclists as they are identified only by road markings. They may help identify the likely presence of cyclists to drivers, but vehicles can and do overrun on-road cycle lanes particularly when turning. The presence of an advisory cycle lane does not in itself make it inherently safe to cycle or necessarily encourage a significant proportion of people who may otherwise drive to cycle instead.
- 3.1.14 The development proposals also include the introduction of a formal two-way cycle path beside College Road that will link Whitechurch Road with the existing cycle routes through Marlay Park. It would appear that sufficient road space exists to provide an appropriate footpath and cycle path adjacent a reduced width College Road carriageway. This would benefit the accessibility of the site but would appear to require the loss of at least 20 trees. The benefits of the cycle path therefore need to be carefully balanced against the harm associated with the loss of the trees.
- 3.1.15 The availability of pedestrian and cycle infrastructure is only one part of the equation with the distance to local services and facilities also needing to be considered. If such services and facilities are beyond what might be taken as a reasonable walk or cycle distance / time from the site, then future residents may simply choose to drive instead.
- 3.1.16 It is noted that the southern element of the site includes 3 No. commercial units identified for food retail, non-food retail and/or café usage. The TAR identifies these as a key feature of the development's sustainability as they will help minimise the need for residents to travel off-site for day to day convenience shopping needs. However, building a commercial unit does not in itself mean that it will be occupied by a convenience retailer. There is certainly nothing in the submitted documentation to suggest that a contract has been signed with a retailer which in turn implies the units are being provided on a speculative basis.
- 3.1.17 Based on the proposed 178 residential units across both elements of the site one has to question whether there would be sufficient retail demand for such a use to be viable, particularly given the low number of existing properties locally that might help increase the retail demand. With no guarantee of a convenience retail use on the site, the sustainability benefits that would otherwise arise cannot be relied upon.

- 3.1.18 The nearest existing local facilities to the site are located at Whitechurch Green where there is a Centra foodstore, Post Office and Pharmacy together with fast food outlets and a Bar. The TAR suggests that these are located within a convenient walking distance of the site. This is not the case.
- 3.1.19 To walk from the centre of the southern element of the site to the entrance of the foodstore is a total distance of 1.8km (approximately 22 minutes). Maximum walking distance from any of the proposed residential units is closer to 2km. It is acknowledged that some residents may be willing to walk or cycle such distances, but others may be hindered by personal fitness or time constraints and simply revert to use of the private car. Such distances certainly cannot be considered 'convenient' particularly if carrying shopping bags either by hand or on a bicycle.
- 3.1.20 Figures 5.12 and 5.13 of the TAR provide 2km (walk) and 8km (cycle) iso-distances from the site in an attempt to demonstrate the accessibility of the site to the existing services and facilities available in the wider built up areas. These are not considered representative as they are based on simple radius measurements which assume direct and available public walking and cycling routes in all directions. This is clearly not the case as pedestrians and cyclists are reliant on either Whitechurch Road to the north or College Road to the east for the initial elements of the journeys meaning the locations that can be reached within 2km and 8km are much smaller than implied by the TAR Figures.
- 3.1.21 Taking the above into account, it is clear that the site is not as accessible by walking and cycling as has been assumed within the TAR. This could lead to an increase in the vehicle trip rates associated with the site and a corresponding increase in traffic impact on the adjacent road network. These issues are considered further later in this Note.

3.2 Public Transport

- 3.2.1 The above considers the pedestrian and cycle issues in the context of shorter distance trips to local services and facilities. However, it is noted that there are very few employment opportunities in the vicinity of the site meaning that it will be reliant on the private car for longer distance trips unless there are good levels of public transport in close proximity to the site.
- 3.2.2 The nearest existing bus stops are located beside Whitechurch Green to the north at a walking distance of approximately 1.6km (20 minutes) from the centre of the southern element of the site. Both stops provide bus boarder kerbs and timetable information but no other waiting facilities. Additional stops are available on Taylor's Lane further to the north however these are approximately 2.1km walk from the centre of the site and therefore unlikely to be used.
- 3.2.3 The main bus services operating from the Whitechurch Green stops are the 15d Whitechurch to/from Merrion Square, the 61 Whitechurch to/from Eden Quay, the 116 Whitechurch to/from Parnell Square and the 161 to/from Rockbrook and Dundrum. These services combine to provide 6 buses between 07:00 and 09:04. It is noted that the 15d and 116 provide only a single bus into the City Centre in the morning commuter peak and one or two buses as return journeys in the evening commuter peak. The 61 provides an hourly to 75-minute frequency throughout the day with the 161 providing seven buses in each direction at an approximately 90 minute frequency.

- 3.2.4 Bus frequency to the City Centre using the 61 is considered poor and unlikely to encourage regular use particularly given the approximately 53 minute journey time coupled with the initial 20 minute walk time to access the bus stop. The 161 offers local journeys to and from Dundrum Town Centre and the LUAS station but again the frequency does not encourage regular use.
- 3.2.5 It is understood that the National Transport Authority have published plans for a new Bus Connects Network for Dublin. This proposes changes to the numbering, routing and frequency of most services within the City. The proposals 'tweak' the services currently available from Whitechurch Green but do not introduce a significantly greater frequency or route choice. They do not provide a 'step change' increase in public transport provision that might encourage a significant transfer from the private car to public transport particularly given the long walk that is required to access the bus stops from the proposed development.
- 3.2.6 A Bus Services and Capacity Assessment Report (BSCAR) forms an Appendix to the TAR. This seeks to quantify the likely demand for bus journeys associated with the proposed development and to demonstrate that the existing services have sufficient capacity to accommodate these additional trips. Additional demand has been based on Central Statistics Office (CSO) 2016 Small Area Map Data for the existing Edmondstown residential areas to the south of Taylor's Lane and extrapolated to represent the predicted number of residents within the proposed development. In summary, this identifies the site as likely to generate 18 weekday bus journeys between 07:00 and 09:00.
- 3.2.7 It is considered that the methodology used is flawed and therefore over-estimates the likely number of bus trips associated with the proposed development site. The CSO reference areas used are all within a short walking distance of the bus stops with existing residents therefore likely to find the bus services convenient and accessible. The same cannot be assumed for residents of the proposed development site as the initial 1.6km (20 minute) walk will inevitably reduce the proportion of bus use when compared to the CSO reference areas used.
- 3.2.8 For the 18 weekday morning commuter peak bus journeys value to be correct, the bus services available on Whitechurch Road would need to be increased to a similar level as those currently available from Whitechurch Green. Just 18 additional bus trips from the development is unlikely to make the diversion of existing or the provision of new services to the site financially viable to a bus operator.
- 3.2.9 The TAR and the BSCAR both make mention of the potential for new bus services via Whitechurch Road associated with the Tibradden Regional Sports Campus and a recent application for a licence to operate a bus service linking Edmondstown, Marlay Park and Whitechurch Road to Sandyford. These 'potential' services cannot be relied on as there is no guarantee that they will come forward. Similarly, no information is provided on the likely frequency of such services or their appropriateness in relation to the travel needs of future residents of the proposed development site.
- 3.2.10 It is also worth noting that the BSCAR concludes sufficient capacity is available on the existing bus services to accommodate the predicted 18 additional bus users. This conclusion is reached based on the assumption that the new trips will be spread equally over all the available services whereas this may not be the case. The conclusion is also based on 'observations' rather than surveys meaning that it cannot be appropriately evidenced.

- 3.2.11 Furthermore, it is to a degree common sense that sufficient seats will be available at Whitechurch as it is the starting point for many of the services. The additional passengers at Whitechurch may however displace existing passengers further down the route should the bus become full on-route hence the demand / capacity needs to be considered over the full route length rather than just at a single stop. It also needs to take account of other committed developments along the route that will themselves increase the demand for the services.
- 3.2.12 The application documentation includes a Mobility Management Plan (MMP) which identifies how the applicant proposes to influence travel modes with the aim of reducing the overall proportion of trips undertaken by car when travelling to and from the site. Key to a successful MMP is the availability of accessible alternatives to use of the car particularly in respect of longer distance journeys, i.e. by public transport.
- 3.2.13 It is maintained that the available public transport will not encourage a significant modal shift away from the car over time and as such there is a high risk that the MMP will not achieve its aims. This illustrates that the proposed site is not a suitable location for a high density SHD.

4.0 PARKING PROVISION

4.1 Car Parking Provision

- 4.1.1 As previously mentioned, the development proposals provide a total of 289 car parking spaces comprising 218 spaces for residents, 66 spaces for visitors and 5 spaces for the non-residential land uses.
- 4.1.2 The starting point for parking standards must be the South Dublin County Council (SDCC) Development Plan 2016-2022. Table 11.24 of the Development Plan identifies the maximum parking rate for a residential land use in Zone 1 (general 'default' rate applicable throughout the County) as being 1 space for a 1 bed apartment / duplex, 1.25 spaces for a 2 bed apartment / duplex and 1.5 spaces for a 3 bed or larger apartment or duplex. For houses the maximum parking rate is 1 space for a 1 bed house, 1.5 spaces for a 2 bed house and 2 spaces for a 3 bed or larger house.
- 4.1.3 A precise interpretation of the Development Plan standards against the proposed accommodation schedule therefore equates to a total provision of 298 spaces. The 218 spaces proposed is well below this maximum value.
- 4.1.4 The SDCC standards are expressed as 'maximum' values with the document stating that they should not be treated as targets and that a lower rate of parking may be acceptable subject to various parameters. These include the proximity of the site to quality public transport services, accessibility to services that fulfil occasional and day to day needs, the introduction of a robust Mobility Management Plan and the ability of people to fulfil multiple needs in a single journey.
- 4.1.5 The previous section of this objection identified that although the site is in an edge of urban location there are few day to day services and facilities and limited public transport available within the locality. This may serve to encourage greater car ownership, car use and parking demand meaning parking provision needs to be carefully considered to ensure an appropriate number of spaces is provided and parking difficulties are avoided.
- 4.1.6 The applicant has sought to justify a reduced parking provision based on an interpretation of the Department of Housing, Local Government and Heritage document 'Sustainable Urban Housing: Design Standards for New Apartments (December 2020).' In 'Peripheral and/or Less Accessible Urban Locations' this document identifies the provision of 1 car parking space per apartment / duplex as being appropriate irrespective of the number of bedrooms within. On this basis, the parking requirement for the apartments / duplex within the site reduces to 106 spaces which matches the number of spaces proposed.
- 4.1.7 112 car parking spaces are proposed for the 72 houses which equates to an average of 1.55 spaces per house. Full provision at the maximum SDCC value equates to 141 spaces or an average of 1.96 spaces per house. A detailed justification for this reduced parking provision for the houses has not been provided and may be difficult to produce. The SDCC guidelines identify a number of scenarios where a lower rate may be acceptable which include aspects such as the availability of quality public transport, the site's proximity to services that fulfil occasional day to day needs, and the close proximity of employment opportunities. As identified previously, these justifications do not apply to the proposed development site location.

- 4.1.8 It is maintained that the overall parking provision proposed for the site is less than that required. Either the parking provision for the houses should be increased, or the number of housing units proposed reduced. Under provision will likely lead to parking in inappropriate locations within the site and associated operational difficulties. It may also lead to over spill of unfulfilled parking demand onto adjacent roads.

4.2 Car Parking Management

- 4.2.1 The applicant has not put forward a Parking Management Strategy for the site. The submitted 'Taking in Charge' plan identifies some on-street parking spaces as being taken in charge by SDCC, some on-street residential spaces being transferred into private ownership and others being controlled by an Assigned Management Company. Exactly how these spaces will be signed, and their use managed / controlled is not identified. Full details should be given at the planning stage so that the effects can be carefully considered and agreed. The introduction of inappropriate controls may lead to unnecessary parking difficulties within the site and unexpected consequences.
- 4.2.2 The TAR identifies that parking for the apartments will be managed and operated by a Management Company and that car parking will not be an automatic entitlement. It also states that the entire development will be continually managed on an on-going basis to ensure that the reduced car dependency nature of the development is continually promoted and enhanced. What it does not do however is provide any detail on exactly what this means or how it will be undertaken. Without this detail within a full Parking Management Strategy the wording of the TAR effectively means nothing. The development is already proposed with a reduced car parking provision that cannot be fully justified given its poor non-car accessibility. Appropriate management of what is provided therefore becomes even more important.
- 4.2.3 It is proposed that Car Club parking spaces will be provided in a prominent accessible location. No details are provided on how many spaces this would involve, where they would be or whether such spaces would be provided in both elements of the site or just one. Without such information there is no firm commitment to such provision or the benefits it could bring.
- 4.2.4 30 parking spaces (approximately 10%) throughout the site are identified as being fitted with Electric Vehicle Charging Points (EVCP), i.e. active provision. It is considered very important that all other residential parking spaces be constructed with passive EVCP provision (appropriate ducting and cabling) to future proof the development for the increasing numbers of electric vehicles over time. A firm commitment to this must be made.

4.3 Cycle Parking

- 4.3.1 The development proposes 627 cycle parking spaces overall which accords with the relevant SDCC and Design Standards for New Apartments requirements.
- 4.3.2 For the apartments / duplex this is provided in defined cycle stores, but it is unclear how this will be provided for the houses. The TAR identifies that it can and will be managed within each individual household however it is unclear whether this means sheds in the rear gardens or whether storage will be provided within the properties themselves.

- 4.3.3 Many of the proposed houses do not benefit from a rear garden gate so would be reliant on tracking potentially dirty cycles through the houses to reach a garden shed, or alternatively to store dirty cycles internally. Such issues do not serve to encourage cycle ownership or use and may lead to an increase in car journeys instead.
- 4.3.4 It is considered that the proposed site layout is inappropriate and should be amended to ensure that all houses benefit from a rear garden gate. All houses should also be provided with a garden shed or similar to create appropriate cycle parking facilities from the outset.

5.0 TRAFFIC IMPACT

5.1 Standard of Whitechurch Road

- 5.1.1 The proposed development forms part of the Edmondstown Lands which are zoned for residential use through the SDCC Development Plan 2016-2022. Specific objective H3 SLO1 refers to the wider site and specifies a low-density development of between 12 and 20 dwelling per hectare depending on the exact land uses taken forward. It also states that densities may be increased where issues of accessibility have been fully resolved in an appropriate manner.
- 5.1.2 It would appear from the above that the standard of Whitechurch Road was a material consideration in the setting of the density limit with the local Roads Department being of the opinion that it is substandard and not appropriate to accommodate significant additional traffic flows from new development. The applicant takes the opposite view and considers Whitechurch Road to be appropriate in the context of the proposed development.
- 5.1.3 The applicant seeks to justify this through carriageway width measurements and cross-reference to DMURS guidance. This is a simplistic approach that takes little account of the sinuous nature of the road alignment, the restricted forward visibility associated with high stone walls on the inside of bends, and the line followed by drivers when seeking to avoid getting too close to boundary walls at the very edge of the carriageway. The applicant has relied on the full carriageway width whereas the effective width used by drivers is frequently less.
- 5.1.4 Similarly, the applicant makes reference to the poor alignment and restricted forward visibility when travelling Whitechurch Road as controlling speeds and being the main reason for only 2 minor accidents having occurred since 2005. This may be partially true, but a larger factor is likely to be the existing low traffic flows that use the route (300 two-way PCUs in the AM peak hour) as low flows clearly reduce the risk of conflicts with vehicles travelling in the opposite direction. If traffic flows increase significantly through new development or similar, then the occurrence of accidents may increase.
- 5.1.5 The Roads Department have already erected 'bends' and 'road narrows' signs and 'SLOW' road marking in various locations. They have also imposed a 3t weigh restriction and traffic calming features. Clearly there is a significant concern regarding the standard of Whitechurch Road and one that the applicant seeks to dismiss too easily. Whitechurch Road is of a poor standard and a significant increase in traffic flows from the proposed development would only increase the road safety concerns.
- 5.1.6 The proposed development has an overall density of 41 dwellings per hectare which is more than double the maximum set by the wording of H3 SLO1. It is maintained that the proposals do not resolve the accessibility issues in an appropriate manner and therefore an increased density is not appropriate.

5.2 Traffic Surveys and Growth Factors

Traffic Surveys

- 5.2.1 The TAR identifies that traffic surveys were undertaken at the Taylor's Lane / Whitechurch Road traffic signals, the Whitechurch Green / Whitechurch Road roundabout and the College Road / Whitechurch Road junction during September and November 2019. The first two junctions were surveyed for the traditional morning and evening peak hours whereas the latter was surveyed across a full 24-hour day.
- 5.2.2 No surveys were undertaken at the College Road / Grange Road junction despite most of the additional development traffic being assigned to and from this direction. This is discussed further below.

Growth Factors

- 5.2.3 Background traffic growth has been applied to the 2019 survey flows to represent the base situation in the 2025 opening year and the 2040 design year. It would appear that the growth factors used within the TAR are incorrect having been based on a superseded version of the Unit 5.3 Travel Demand Predictions. The correct values for the Dublin Metropolitan Area using Central growth rates are 1.101 between 2019 and 2025 and 1.140 between 2025 and 2040. These factors are much higher than the 1.030 and 1.077 respectively used within the TAR which draws into question the validity of all the resulting capacity assessments.

5.3 Trip Generation, Distribution and Committed Development

Trip Generation

- 5.3.1 The TRICS computer database is the recognised source for trip rates in Ireland and the UK. This allows the trip generating characteristics of different land uses to be compared and the impact of any new trips on the road network to be assessed.
- 5.3.2 The TAR states that the TRICS database has been used to identify trip rates for the various land uses proposed within the site with outputs for all the proposed land uses included as an Appendix of the report.
- 5.3.3 It is not possible to examine the appropriateness of the survey sites used within the TRICS assessments as the outputs are incomplete and do not show the search parameters used. Factors such as site location (town centre, edge of town etc) and resident population within 1 mile and 5 miles of a site are key and can have a considerable impact on the resulting trip rates. How much reliance can be given to the accuracy of the TRICS data is debatable and the trip generation values must therefore be treated with caution.

Trip Distribution

- 5.3.4 The TAR simply states that the distribution of development traffic is based on the surveyed traffic movements at the nearby key junctions. This is a simplistic approach that can be appropriate in certain circumstances but may not be so in this case.

- 5.3.5 It is suggested that a more accurate approach would be to identify where the current residents of the Edmondstown area work and to distribute the development flows to the road network accordingly. It is considered that this would result in a greater number of development trips being assigned to Whitechurch Road north and beyond to Taylor's Lane and represent a more likely distribution of development trips.
- 5.3.6 At present the TAR suggests approximately 27.5% of all new trips would be to and from the north via Whitechurch Road in the AM peak hour with most of the remainder using College Road. 29.5% of all new trips in the PM peak hour would be to and from the north with again most of the remainder via College Road. Even a brief look at a map of the local area draws this distribution into question as there are considerable employment areas located to the west and north of Dublin that would be more easily accessed via Whitechurch Road and Junction 12 of the M50. A distribution of 50% via Whitechurch Road is considered more likely which could materially affect the associated traffic impact.
- 5.3.7 It is considered that the trip distribution associated with the proposed development should not just be assumed but be assessed and justified in greater detail. Only then will an accurate assessment of traffic impact be possible.

Committed Development

- 5.3.8 The TAR allows for two committed development sites in the local area, i.e. the Tibbradden Regional Sports Complex to the south and the Glinbury housing scheme to the north. Trip generation for these sites has been derived through use of the TRICS trip rate database and again without full details of the site selection process being provided within the TAR Appendix. As such, the survey sites used may not be representative of the sites' locations or their associated trip generation.
- 5.3.9 Similarly, it appears that the resulting trip numbers have simply been distributed to the local highway network pro-rata to the recorded turning movements which again may not be representative of the actual distribution that will occur.
- 5.3.10 The above identifies the committed development sites that have been included but just as important is the remainder of the wider zoning of the Edmondstown Lands that has not been included. The TAR makes great play of the development providing the first section of a link road between Whitechurch Road and Edmondstown Road but fails to assess the traffic implications of its eventual delivery. How many residential units could come forward on the wider zoned lands is not known but pro rata to the current proposals it could clearly be up to 1,000 if not more.
- 5.3.11 Traffic flows for the full extent of the zoned lands must be identified and distributed to the local road network as committed development. Without this, it cannot be known whether the proposed section of the link road and the proposed signal-controlled junction with Whitechurch Road will be suitable for the long term development scenario. This applies both to the design standards used and the junction capacity. These assessments could potentially be undertaken as a sensitivity case for the 2040 design year only as it is unlikely that the full link road and full development of the zoned lands will be complete by the 2025 assessment year.

- 5.3.12 Introduction of a link road between Edmondstown Road and Whitechurch Road could also lead to a more general redistribution of existing through traffic in the wider area. The effects of this can only really be assessed accurately through undertaking a more strategic traffic modelling exercise using software such as SATURN. At present the TAR considers the short term traffic impacts of the proposals in isolation with no consideration of the longer term implications associated with the wider zoning. This is a significant flaw of the TAR and the application as a whole and must be corrected.

5.4 Operational Capacity

- 5.4.1 The above has raised significant concerns regarding the accuracy of the growth factors, trip rates, trip distribution and committed development used within the TAR. These factors mean that the 'with development' traffic flows in the opening and design years are incorrect and that the junction capacity assessment results reported within the TAR are therefore also incorrect.
- 5.4.2 Notwithstanding, the network impact values identified in Table 4.2 of the TAR identify PM peak flow increases of between 2.1% at the Taylor's Lane / Whitechurch Road signalised junction and 7.8% at the Whitechurch Green / Whitechurch Road roundabout. Given the concerns regarding growth factors, trip rates, distribution and committed development, the actual impact value will likely be higher still. It is essential that this overall network impact assessment be revisited to identify the actual levels of flow increase that will occur and to allow accurate junction capacity assessments to be undertaken. Only then will the true impact of the proposals be identified.

Taylor's Lane / Whitechurch Road

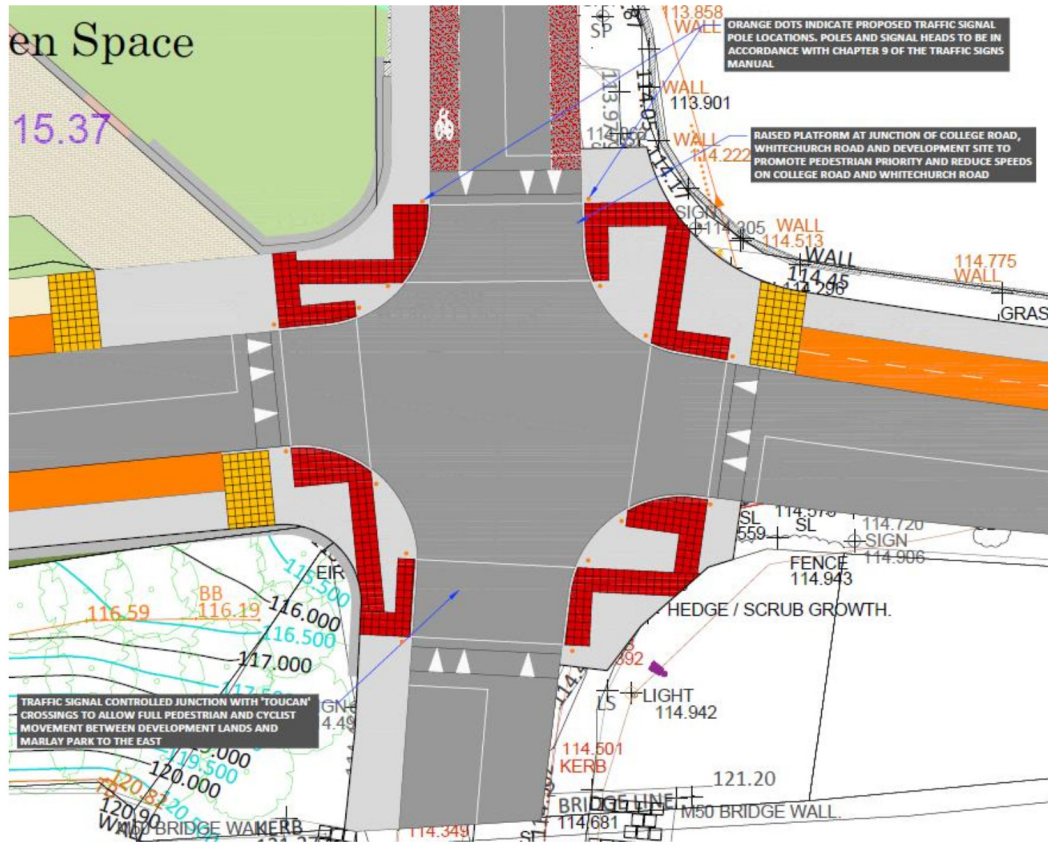
- 5.4.3 A 2.1% increase in traffic flows would not normally require a detailed assessment of junction capacity. However, the junction is already heavily trafficked and even a modest increase in traffic flows could make a material difference to its operation and the associated queuing and delays that arise. It is considered that a detailed assessment of the junction should have been undertaken within the TAR and that the necessary revision of the growth factors, trip rates, trip distribution and committed development now makes it essential.

Whitechurch Green / Whitechurch Road Roundabout

- 5.4.4 The TAR assesses the operational capacity of the roundabout through use of the ARCADY computer software with a summary table of the results provided as Table 4.4. This identifies a maximum Ratio of Flow to Capacity (RFC) value of 0.28 which is well below the 0.85 value that is taken as representing effective operational capacity.
- 5.4.5 A closer examination of the geometric parameters used within the ARCADY model identifies that an inscribed circle diameter of 30m has been used for the roundabout whereas the actual dimension is only 25m. Similarly, it is noted that all three approach arms have been given exactly the same geometry which is clearly not the case on the ground. The capacity model is therefore inaccurate with the results that have been presented not being representative of future conditions.
- 5.4.6 Again, traffic flows through the roundabout are likely to increase once the growth factors, trip rates, trip distribution and committed development have been corrected. Whether this will take the roundabout over capacity cannot be known at this time, but revised assessments should clearly be undertaken to test it properly.

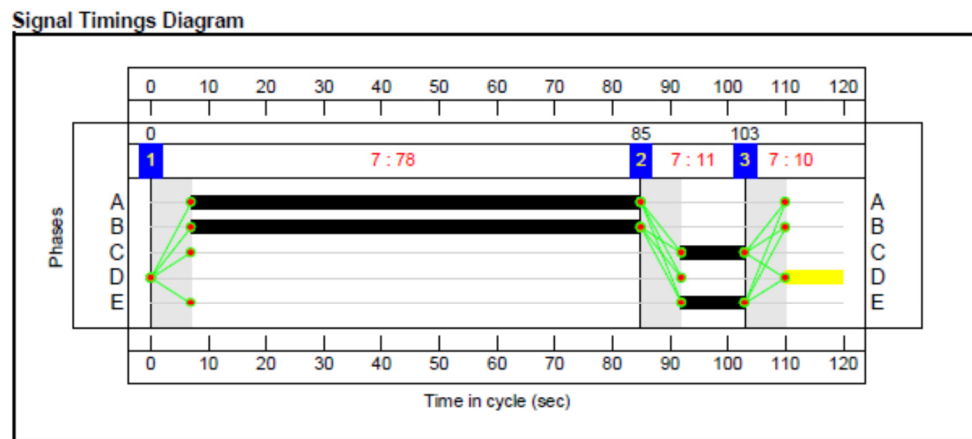
College Road / Whitechurch Road / Link Road Traffic Signals

- 5.4.7 It is proposed to convert the existing three arm yield junction into a four arm signalised junction as identified in the junction layout plan below. The north and south arms are Whitechurch Road, the east arm is College Road, and the west arm is the initial section of the proposed link road that also acts as the site access to the southern element of the proposed development.



- 5.4.8 The operation of the proposed junction has been assessed through use of the LINSIG computer software with the results being summarised in Table 4.5 of the TAR. The maximum Degree of Saturation (DoS) for the signals is identified as being 34% which is well below the 90% value which is taken as representing effective operational capacity.
- 5.4.9 Although the proposed junction is shown to operate within capacity in the short term, it must again be noted that the traffic flows used for the assessments are not accurate as they do not allow for full delivery of the wider zoned lands accessed via the western arm, nor do they allow for the potential redistribution of through traffic associated with completion of the full link road. It is essential to fully assess the operation of the junction with the zoned lands and the proposed link road in place otherwise it cannot be known whether it will be constructed with sufficient capacity to cater for this longer term scenario.

- 5.4.10 Output from the LINSIG model forms an Appendix to the TAR with a review of the modelling approach identifying various concerns. For instance, a 120 second cycle time has been used for the assessments which is contrary to the requirements of DMURS which seeks to prioritise pedestrians and cyclists over cars through the use of short cycle times at signalised junctions.
- 5.4.11 At present the modelling identifies that the pedestrian and cycle crossings would benefit from only a 10 second green time every 120 seconds as shown by Stage 3 (the yellow bar) in the signal timings diagram below.



- 5.4.12 Clearly this does not prioritise pedestrians and cyclists with the modelling needing to be revisited based on a shorter cycle time (90 seconds or preferably less). If pedestrians and cyclists are required to wait too long they may choose to cross the junction without waiting for the green signal with the associated road safety issues that may arise. A reduced cycle time will inevitably increase the overall DoS values.
- 5.4.13 The above diagram also suggests wider errors in the programming as Stage 1 (all movements from Whitechurch Road north and south) is given considerably more green time than Stage 2 (all movements College Road east and link road west), i.e. 78 seconds compared to 11 seconds. This is counter intuitive as traffic flows on the College Road approach are higher than either of the Whitechurch Road approaches and LINSIG seeks to balance the DoS across all arms. The imbalance between the stage timings clearly indicates an error within the model that must be corrected.

College Road / Grange Road Traffic Signals

- 5.4.14 The TAR does not include an assessment of the existing College Road / Grange Road traffic signals despite the trip distribution diagrams suggesting most of the traffic generated by the development will pass through this junction. If the distribution assumptions are correct, then this junction should be subject to a detailed capacity assessment to ensure no operational difficulties in the post development scenario.

- 5.4.15 Delivery of the proposed link road between Edmondstown Road and Whitchurch Road, plus full development of the wider zoned lands, will clearly add significant levels of additional traffic to College Road in the longer term which may well have adverse implications on its junction with Grange Road.
- 5.4.16 In summary, it is considered that the junction capacity assessments within the TAR are inaccurate and need to be completely revisited before any decisions can be made. Growth factors, trip rates, trip distribution, committed development and strategic modelling of the future link road all need to be reconsidered so that these revised capacity assessments accurately represent the future traffic flow conditions which the TAR currently does not. Only through this process can the short term and long-term impacts of the proposed development be fully understood.

6.0 SUMMARY AND CONCLUSIONS

6.1 Summary

- 6.1.1 The location of the proposed Edmondstown SHD is not considered to be sufficiently accessible by non-car modes of travel. At present the nearest Local Centre is approximately 1.8km walk from the centre of the southern element of the site with the nearest bus stops being a 1.6km walk. The standard of the walking route to these facilities via Whitechurch Road is also considered to be poor.
- 6.1.2 The applicant envisages provision of a convenience store within the site and the future provision of public transport passing the site. Neither of these can be guaranteed at this stage as there may not be sufficient viability based solely on the number of residential units being proposed. The site will therefore be largely reliant on the use of the private car with the associated additional traffic impact that will result.
- 6.1.3 On road advisory cycle lanes are proposed for Whitechurch Road in an attempt to encourage cycle use however the effective width of the carriageway, its sinuous horizontal alignment and limited forward visibility all combine to raise significant road safety implications with such a proposal.
- 6.1.4 An assessment of likely demand for public transport has been undertaken for the site but has been based on flawed assumptions. This overestimates the likely public transport demand from the site given the initial 1.6km walk required to access the bus stop.
- 6.1.5 The proposed car parking provision for the Edmondstown SHD application is inappropriate. Parking for the apartments / duplex complies with the appropriate standards but that for the houses does not. This shortfall has not been fully justified particularly given the poor non-car accessibility of the site and the likely reliance on the private car. Under provision of on-site parking could lead to overspill parking in inappropriate locations both on and off the site.
- 6.1.6 The results of the junction capacity assessments quoted within the TAR cannot be relied on. There are serious concerns regarding the growth factors, the trip rates, the trip distribution and the committed development used within the assessments which could lead to a significant increase in the traffic impact of the development proposals once corrected. These issues need to be reconsidered in full.
- 6.1.7 The additional traffic associated with future development of the wider Edmondstown Lands zoning has not been considered nor has the potential redistribution of existing traffic movements that would result from provision of the link road between Whitechurch Road and Edmondstown Road. Without such consideration there can be no guarantee that the proposed signalised crossroads site access arrangement is capable of accommodating full development of the wider zoning of which the proposed SHD is merely the first phase.
- 6.1.8 The geometric parameters used within the ARCADY modelling of the Whitechurch Green / Whitechurch Road roundabout need to be revisited so that they better represent the actual dimensions and geometry of the junction. These adjustments are likely to show a reduction in capacity compared to that reported in the TAR particularly given the concerns regarding growth factors, trip distribution etc.

- 6.1.9 The cycle time used within the LINSIG modelling of the Whitechurch Road / College Road / site access junction needs to be reduced to give more emphasis to pedestrian and cycle movements. Similarly, the model needs to be checked in detail as the current results do not balance green times across the various approaches in the way that it should. These adjustments are likely to reduce the capacity of the proposed traffic signals particularly once the full traffic flows associated with the wider zoned lands and the redistributed traffic flows associated with the proposed link road are added.
- 6.1.10 A capacity assessment of the Taylor's Lane / Whitechurch Road junction and the College Road / Grange Road junction must also be undertaken to allow the full impacts of the development to be understood. This is particularly required in the future design year and taking into account full development of the wider zoned lands and provision of the link road between Whitechurch Road and Edmondstown Road. The SHD forms the first part of development of the wider Edmondstown zoned lands and it therefore cannot be assessed in isolation.

6.2 Conclusion

- 6.2.1 In conclusion, it is clear that the proposed development is not in a sufficiently accessible location for the scale of development proposed and that the traffic impact of the proposals has not been assessed in sufficient detail. Given this, we respectfully request that the application be refused.