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09 August 2022

Land Use, Planning & Transportation
South Dublin County Council
County Hall,
Tallaght,
Dublin 24.

RE: 170232 – Car parking rationale in relation planning application SD22A/0128

Dear Sir / Madam

This letter has been prepared by DBFL Consulting Engineers in relation to the recent request by South Dublin County Council (SDCC) for Additional Information. The Additional Information being sought relates to an amendment to a previously granted planning application (ABP Ref: 305878-19) for a mixed use development "Two Oaks" along Scholarstown Road.

This letter seeks to address the comments provided by SDCC and to clarify the car parking and cycle parking proposed within the development as a result of this amendment.

Introduction

Ardstone Homes Limited (Applicant) have recently submitted an amendment to a previously granted planning application. The application seeks an amendment to "Block D2" within the mixed use (residential and retail) development "Two Oaks". Block D2, as granted, provided two retail units at ground floor level measuring 135sqm and 112sqm as well as a restaurant/café at first floor level measuring 271.5sqm.

The amendment proposes the provision for a single retail unit in Block D2 comprising an amalgamation of the two permitted ground floor units and the change of use of the first floor unit from restaurant/café to ancillary retail floor area principally providing storage/back-of house/office space for the retail unit at the ground floor level.

Additional Information

Additional Information was sought from SDCC in relation to this amendment within the development. A summary of each point of additional information is set out below as well as a response/clarification to each comment provided.

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1. *The proposed development (Block D2) would now provide for a total approximate area of 520.5sqm of retail unit. It was outlined that this is a significant increase to what was previously permitted per unit. It is noted that, although this does not trigger a full Retail Impact Assessment or Transport Impact Assessment, there are concerns that the proposal would impact on the vitality and viability of surrounding retail centres and would also contribute to additional traffic generation. It was requested to provide justification for a retail unit of this size.*

Response: It is noted that the total approximate area for the revised retail unit is 520.5sqm. This is broken down as follows:

Ground Floor Level: Single retail unit (GFA of 247sqm, NFA of 235sqm)

First Floor Level: Ancillary retail area providing storage / back of house / office space solely for use of the retail unit at ground floor level (271.5 sqm)

It is acknowledged that under usual circumstances, a retail unit is assessed in terms of "gross" area and this usually comprises a higher percentage of retail space with a lower percentage of space then allocated as storage/back of house for that retail space. With regard to this retail unit, however, a total of 48% of this unit is allocated as retail space with 52% allocated as storage/back of house for this space. Therefore, the proportions in terms of active use for the retail unit are not reflective of typical retail areas.

With regard to trip generation and demand potential of this revised single retail unit, it is envisaged that demand will be lower than that potentially generated within the previous submission where there were two retail spaces as well as a café/restaurant. This single retail unit will be utilised with the principal purpose of accommodating local residents within the Two Oaks estate, with a very minor element of additional footfall expected from nearby dwellings who do not have a small day-to-day convenience retail unit in closer proximity to them than the proposed unit.

A Retail Report was undertaken in terms of assessing the feasibility of providing retail within the Two Oaks residential estate and what impact this would have on other retail centres in the surrounding area. The conclusion of the report outlined that the retail units within Two Oaks would not negatively impact on surrounding retail centres and would not cause potential re-routing of trips away from these other retail centres.

2. *Considering the proposed amalgamation of the units in Block D2, and the potential increase in traffic generation, the car parking ratio for the development as a whole must be carefully considered. The applicant is requested to submit a car parking rationale including calculations used, and, if applicable, a revised car parking drawing.*

Response:

Within the original application, a total of 30 car parking spaces were allocated specifically to Block D2. This was due to the requirement to provide parking spaces for two separate retail units as well as a café/restaurant. This was also considered a conservative provision and complied with the maximum parking guidance from the SDCC development plan.

The proposed amendments to Block D2 comprise of the amalgamation of the two separate retail units into one retail unit and the removal of the café/restaurant which is being replaced in its entirety by back-of-house/ancillary

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office space for the retail unit. Therefore, the parking requirement in this location will reduce as a result. The retail unit in Block D2 will now principally have the purpose of providing residents within Two Oaks with additional shopping needs during the week between their big shop at weekends, therefore, will provide for “top-up” shopping. It is considered that any external visits will be from surrounding residents who will largely walk to the retail unit.

The parking provision for the revised retail unit has been calculated using the 2022 – 2028 SDCC Development Plan and the maximum provision for both the retail space and the proposed storage area on the 1st floor is outlined in the table as follows:

Unit	Size (sqm)	Provision	Maximum car parking spaces required
Single retail unit	247	1/15sqm	16.5
Storage area for retail unit	271.5	1/15sqm	18
		Total	34.5

A maximum of 35 car parking spaces could be provided based off the maximum allocation within the 2022-2028 SDCC Development Plan and based off the total gross floor area including the storage area for the retail unit.

It has been determined that the proposed storage area on the 1st floor will not generate additional traffic to this retail unit. Therefore, the requirement for a maximum of 18 parking spaces for this area has been removed for the parking assessment. The maximum provision, therefore, for the retail space is 16.5 parking spaces.

A total of 12 parking spaces have been allocated for this retail space within the development. This parking allocation was carefully considered with the following aspects determining the level of parking required.

The retail unit is strategically located within a residential estate with c. 1,500 no. residents. It is envisaged that residents will walk and cycle to this retail unit in order to do their “top-up” shopping rather than requiring their vehicle, as they would with their “big shop” at the weekend.

In terms of demand, this is now a single retail unit rather than two separate retail units, and as such, will generate less traffic demand as a result. It is also noted that potential traffic demand that emerged from the café/restaurant within the original submission has been removed within this submission.

A higher proportion of cycle parking has been provided for within Block D2 in order to accommodate for an increase in sustainable travel to this unit. The table below outlines the minimum cycle parking required as per the 2022 – 2028 SDCC Development Plan.

Unit	Size (sqm)	Long Stay	Short Stay	Minimum cycle parking spaces required
Retail Convenience	518.5	1/5 Staff	1/50 GFA	
Total		2	11	13

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The number of staff within the retail unit is proposed at approximately 10 no. Therefore, the minimum requirement for cycle parking is 13 spaces with 2 of these allocated as long term stay (1 per 5 staff) and 11 allocated as short term.

A total of 30 cycle parking spaces have been allocated for this retail unit with 2 of these allocated as long term stay and 28 allocated as short term stay to accommodate residents cycling to and from this unit.

Therefore, considering the reduction in traffic generation and use in comparison to the original submission, as well as the local demand within the residential estate (c 1,500 residents) and the increase in cycle parking, the justification for car parking allocation of 12 spaces has been determined as adequate for this single retail unit within Block D2.

- 3. The third comment noted that the South Dublin County Council Development Plan 2022 – 2028 will come into effect on August 03rd 2022 and that the Planning Authority will have regard this new Plan when making decisions in relation to applications from August 03rd 2022. The applicant has therefore been requested to provide a report demonstrating that the proposed development is in accordance with the SDCC Development Plan 2022 – 2028.

Response:

The 2022-2028 SDCC Development Plan has been reviewed in relation to the car parking and cycle parking allocation. These have been reviewed, carefully considered and provision for both has been implemented within the development which best accommodates for and encourages sustainable travel.

We trust this provides the clarification required and should you have any queries please do not hesitate to contact us.

Yours sincerely

Jane Hennaghan (handwritten signature)

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