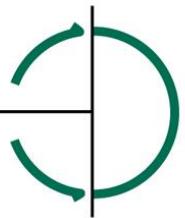


# LRD Retention Application

**Client: Randalswood Holdings Ltd.**

**Traffic and Transport Statement**



Description:

**Traffic and Transport Statement**

Author:

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18<sup>th</sup> June 2025

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## 1 INTRODUCTION

### 1.1 Background to Report

1.1.1 ILTP Consulting was commissioned by Randelswood Holdings to prepare a Traffic and Transportation Statement in respect of a proposed LRD application that includes for the retention of certain elements of the overall permitted SDH development (Ref: ABP-307092-20 and ABP-309899-21) which are now nearing completion and are partly occupied.

1.1.2 ILTP Consulting were previously engaged by Randalswood Holding to prepare a Mobility Management Plan which was submitted to SDCC as part of the Compliance for Condition 16 of permission SHD3ABP-307092-20. Appendix A attached includes confirmation from SDCC that it was satisfied with the compliance submission in respect of Condition 16.



## 2 PERMITTED DEVELOPMENT

### 2.1 Description of Permitted Development

2.1.1 The subject site was granted planning permission by An Bord Pleanála in September 2020. The planning consent consisted of the demolition of all existing structures on site and the construction of a residential development of 250 no. 'build to rent' apartments (134 no. 1 beds, 116 no. 2 beds) in 5 no. blocks; with a café and ancillary residential amenity facilities, to be provided as follows:

- Block A containing a total of 27 no. apartments comprising of 13 no. 1 beds and 14 no. 2 beds, in a building ranging from 3-6 storeys over basement in height, with 1 no. communal roof garden (at third floor level), and most apartments provided with private balconies/terraces. Block A also provides a café, a reception/concierge with manager's office and bookable space at ground floor level; meeting rooms and workspace/lounge at first floor level; a gym at second floor level; and a cinema and a games room at basement level;
- Block B containing a total of 46 no. apartments comprising of 18 no. 1 beds and 28 no. 2 beds, in a building 6 storeys over basement in height, and all apartments provided with private balconies/terraces;
- Block C containing a total of 47 no. apartments comprising of 30 no. 1 beds and 17 no. 2 beds, in a building 6 storeys over basement in height, and all apartments provided with private balconies/terraces;
- Block D containing a total of 67 no. apartments comprising of 33 no. 1 beds and 34 no. 2 beds, in a building 7 storeys over basement in height, and most apartments provided with private balconies/terraces;
- Block E containing a total of 63 no. apartments comprising of 40 no. 1 beds and 23 no. 2 beds, in a building 8 storeys over basement in height, and all apartments provided with private balconies/terraces.

2.1.2 It was proposed to provide a total of 125 car parking spaces (120 basement spaces & 5 surface level spaces) which includes 26 Electric Vehicle (EV), 5 visitor parking spaces, 5 mobility impaired spaces, 2 Car Club, 10 motorbike parking spaces. In addition, 276 No. cycle parking spaces will be provided (250 within the basement and 26 at surface level).

### 2.2 Request to Alter Permission

2.2.1 A request to alter the terms of the permitted development was submitted to ABP on 8<sup>th</sup> April 2021, this request included a number of items but the item relevant to this report was a change in the permitted apartment layouts, communal spaces and unit mix in Block B:

- *“, alterations to previously permitted apartment layouts and communal spaces within Block B and alterations to the previous permitted apartment mix within this block only from 18 number one-beds and 28 number two-beds (46 units), to now provide 12 number one-beds and 34 number two-beds (46 units).”*

2.2.2 The Inspector deemed that the proposed changes would not result in a material alteration to the terms of the development and the request was subsequently granted by ABP on 20<sup>th</sup> May 2021.



## 2.3 Description of Development for Retention Permission

2.3.1 Retention permission is sought by Randelswood Holdings Ltd. for development at Palmers Gate, Kennelsfort Road Lower, Palmerstown, Dublin 20.

2.3.2 The development consists of:

- Alterations to the previously permitted Strategic Housing Development (permitted under Ref. ABP-307092-20 and ABP-309899-21, now nearing completion) which include alterations to the basement including general reconfiguration of the layout including bin store layouts, with the construction of an additional basement area to accommodate an additional bin store and an 18 additional car parking spaces (now a total of 138 no. car parking spaces at basement level), the construction of a larger ESB sub-station on site to meet ESB requirements;
- and alterations to the previously permitted apartment unit layouts and mix of Block C from 30 no. 1 beds and 17 no. 2 beds to now provide 32 no. 1 beds and 15 no. 2 beds, and Block E from 40 no. 1 beds and 23 no. 2 beds to now provide 42 no. 1 beds and 21 no. 2 beds), and all associated site works necessary to facilitate this development.

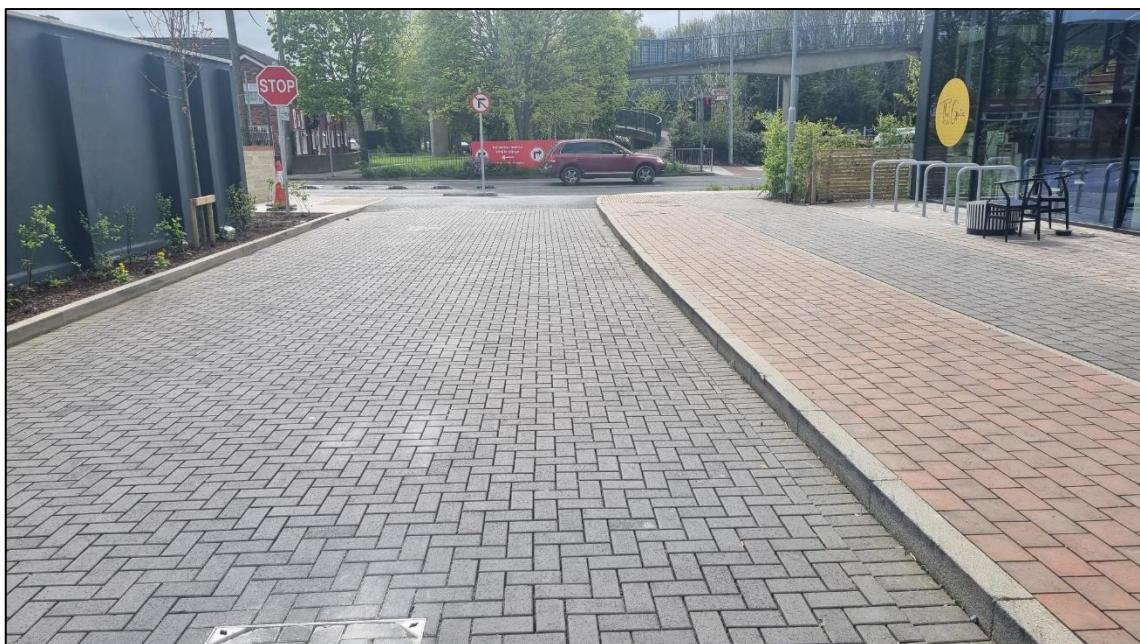
2.3.3 As part of the construction process the overall basement area was extended to facilitate a more economical construction and maintenance management of the overall development. This has resulted in a large basement area under Block E.

2.3.4 There are other minor changes also proposed to facilitate an enlarged ESB sub-station.

## 2.4 ILTP Site Visit

2.4.1 ILTP undertook two additional site visits, one in June 2024 when works were still ongoing and a second in September 2024, at which stage the development was part occupied and the proposed retention areas were accessible.

2.4.2 Our site visit showed that the overall access arrangements and street layout are in accordance with the permission and compliance submission made in respect to Condition 16. While there are some final works and tie in work to be completed on the entrances via Palmers Gate off Kennelsfort Road Lower to the east and the gated access through the adjacent business park to the west, both access points are completed generally in accordance with that permitted or approved by the planning authority. These entrances are illustrated in Figure 2.1 and 2.2 attached.



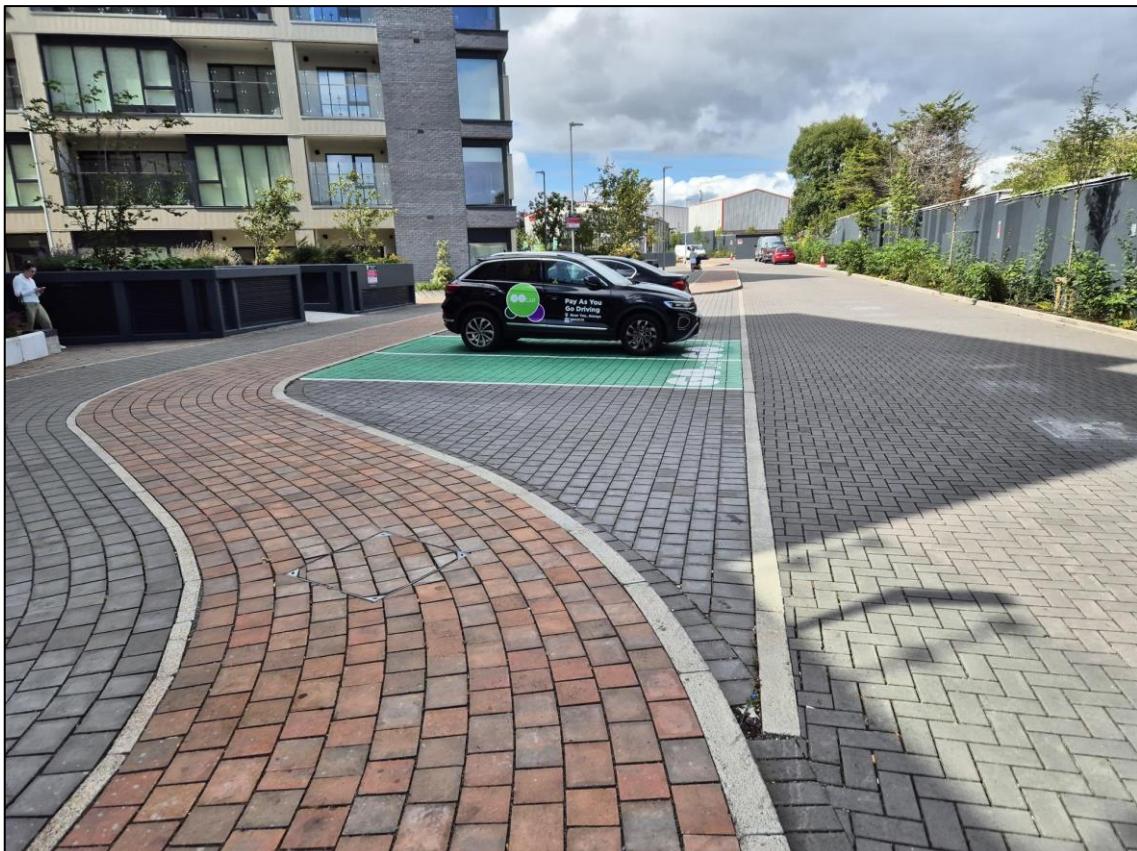
**Figure 2.1: Eastern Entrance Off Kennelsfort Road Lower**



**Figure 2.2: Western Entrance Through Adjacent Palmerstown Business Park**



2.4.3 The Go Car, car share facility is operational, and the surface car parking is provided as illustrated in Figure 2.3 in accordance with the permitted development.



**Figure 2.3: Surface Car Parking including GoCar Spaces**

2.4.4 The basement entrance is illustrated in Figure 2.4. These provide access to the basement for cars and bicycles and is in accordance with the overall permitted development.



**Figure 2.4: Basement Entrance**

2.4.5 The underground cycle and car parking storage area is completed to a very high standard and includes car and cycle parking areas as well as a bin storage area. EV charge points are also provided in accordance with the planning permission. Significant cycle parking was observed in the basement, and high usage of the car parking spaces was also noted.

## 2.5 Comparison of Permitted and Proposed Retention Development

2.5.1 In traffic and transport terms, the main change included in the proposed retention application are in respect to the alteration to the number and size of units in Block C and Block E. These are summarised in Table 2.1

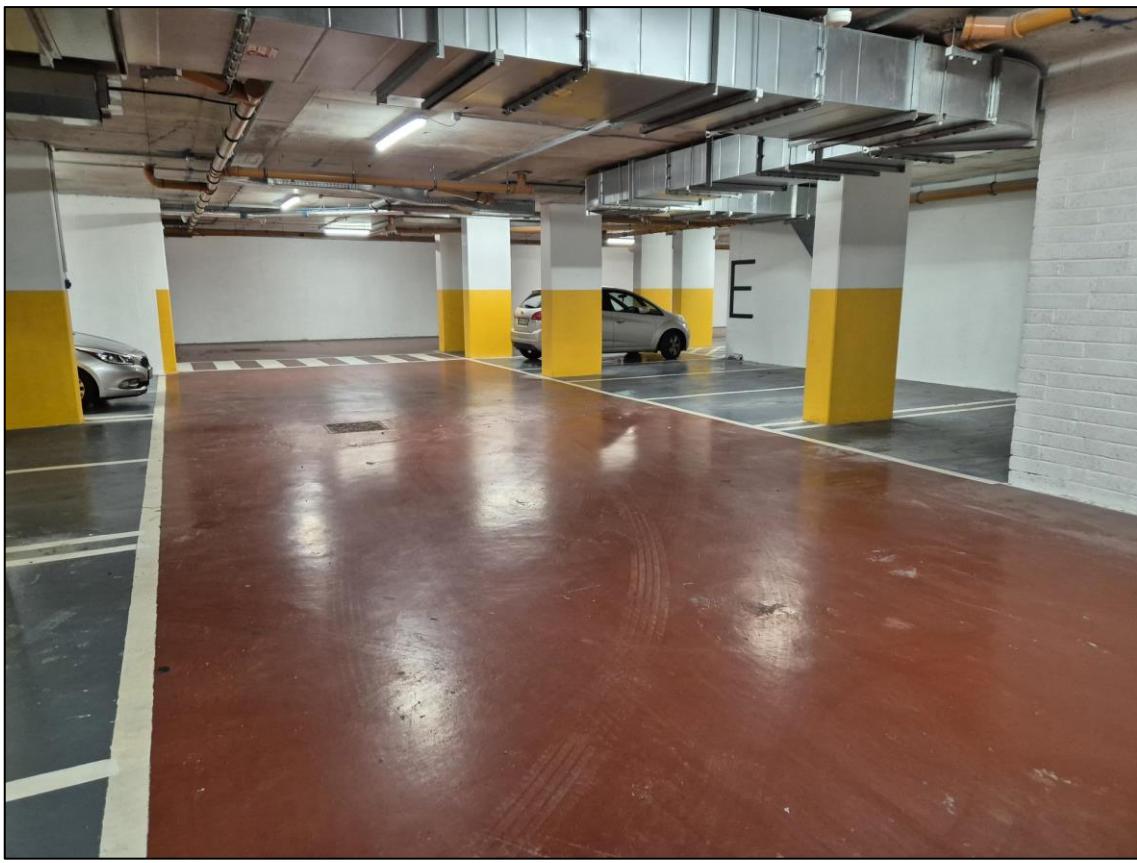
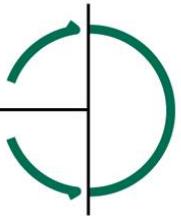
**Table 2.1: Comparison of Permitted and Proposed Retention Development**

Block	Apartment Type	Permitted	Retention
Block C	1-bed	30	32
	2-bed	17	15
	<b>Total</b>	<b>37</b>	<b>37</b>
Block E	1-bed	40	42
	2-bed	23	21
	<b>Total</b>	<b>63</b>	<b>63</b>

2.5.2 In terms of traffic impact, the proposed changes to the apartment mix will have no measurable or material change to the overall traffic generated by the proposed development.

## 2.6 Proposed Retention of Additional Basement Area

2.6.1 The additional area in the basement proposed for retention is currently laid out for additional car parking and storage area and is illustrated in Figure 2.5.



**Figure 2.5: Additional Proposed Parking Block E**

2.6.2 This area is proposed for an additional 18 no. car parking spaces and a bin storage area. The additional car parking area can, however, be re-purposed in the future if same is deemed desirable.

## **2.7 Proposed Car Parking and CDP 2022-2028 Car Parking Standards**

2.7.1 The County Development Plan 2022-2028 (CDP) includes updated car parking standards for proposed new developments. These car parking standards would have had regard to the prevailing national planning guidance when the new CDP was being prepared.

2.7.2 The SDCC CDP section 12.7.4 sets out the maximum car parking standards for residential development in Table 12.26. The car parking maximum rates are set out in Table 12.26 for Zones 1 and 2. Zone 2 sets lower maximum car parking rates, and this is the appropriate zone for the development due to its proximity to existing high-frequency bus service and the planned Core Bus Corridor (CBC), which has been approved by ABP.

2.7.3 Table 2.2 shows the overall car parking ratios for both the permitted and retained development. This confirms that the overall car parking ratio with the retained car parking remains well below the Zone 2 maximum CDP rates.


**Table 2.2: SDCC CDP Car Parking Ratios for Existing and Retained Car Parking**

Permitted Development			Retention Application				
	1 bed	2 bed	Total	1 bed	2 bed	Total	
Block A	13	14	27	13	14	27	
Block B	18	28	46	12	34	46	
Block C	30	17	47	32	15	47	
Block D	33	34	67	33	34	67	
Block E	40	23	63	42	21	63	
	134	116	250		132	118	250

SDCC Zone 2 Maximum Standards (per Unit)			SDCC Zone 2 Maximum Standards (per Unit)			
	1 bed	2 bed	Total	1 bed	2 bed	Total
Rate	0.75	1	-	0.75	1	-
Maximum	101	116	217	99	118	217

Permitted Spaces	125	Retention Spaces	143
Ratio	0.50	Ratio	0.57

## 2.8 Survey of Existing Car Parking Take Up

2.8.1 To determine the existing car parking utilisation within the proposed development the Management Company undertook an analysis of the existing car parking demand for the development in November 2024.

2.8.2 The scheme to date is entirely built to rent. However, it is important that the tenant type is also considered, as different renters have different car access and hence car parking needs. Single people or students have generally far lower car parking requirements and can generally better avail of walking, cycling, or public travel modes, than say family units or those working in particular employment types, such as Gardai or medical employees, and those who are required to do shift work.

2.8.3 The car parking survey results are set out in Table 2.3. This shows that all the existing car parking spaces are allocated at present. The car parking is allocated by the Management Company on a first-come first served basis.

2.8.4 The result also shows there is an excess in demand for car parking spaces, with a waiting list for parking spaces within the development. This is likely to result in car parking along the access road or in adjacent streets. While there is some evidence of this occurring at present this demand is likely to increase as the overall development becomes fully occupied.

2.8.5 The survey results also show that 43-45% of the units are occupied by families and that a majority, 86% of the units, are occupied by working professionals, with over 20% working in healthcare. This is a far higher ratio than might typically be expected in a rental development and highlights the understandable need for higher car parking provision for this development at this particular time.

**Table 2.3: Management Company Residential Survey - Results.**

Palmers Gate Car Park	
1-BED apartment	132
2-BED apartment	118
<i>Total:</i>	<b>250</b>
Total parking spaces:	130
Total parking space rented:	130
<i>Remaining space:</i>	<b>0</b>
Residents on waiting list for parking:	19
Request for a second space:	8
<b>Working Professionals:</b>	<b>86%</b>
<i>Frontliners healthcare:</i>	<b>21%</b>
<i>IT / Engineering Sector:</i>	<b>34%</b>
<b>Families:</b>	<b>43-45%</b>

2.8.6 The modest increase in car parking provision proposed in the retention application is justified based on the mix of uses currently occupying the Palmerstown Gate development and their associated car parking requirements.

## 2.9 Delivery of Additional Sustainable Travel Modes

2.9.1 The additional car parking proposed for retention is justified based on the large numberer of families in the development, and the employment types of the current residents. It is also noted that the proposed development is immediately adjacent to the planned Liffey Valley to City Centre Core Bus Corridor (CBC). This CBC received permission from An Bord Pleanála in 2024, but construction of this CBC has yet to commence. Note that the CBC also includes improvements to pedestrian and cycle facilities in addition to a significantly improved bus network.

2.9.2 It is anticipated that this CBC will not be fully operational by 2028 at the earliest. Once in operation, the CBC is likely to encourage additional number of the Palmerstown Gate residents to use bus, cycle and travel modes.

2.9.3 Once the CBC is in place and operational, post-2028, would be an appropriate time to undertake a detailed review of the retained car parking provision. If found to be surplus to requirements, at that stage, some or all of the proposed retention car parking spaces could be repurposed to better meet the needs of the residents of the proposed development. This evidence-led approach could involve the replacement of some car parking spaces to provide for some additional bike parking, e-scooter parking, motorcycle parking, or increased car share facilities being provided.



## 2.10 Mobility Management Plan – Ongoing Review

- 2.10.1 The Mobility Management Plan (MMP) as submitted as part of the compliance to Condition 16 sets mode share target for the overall development.
- 2.10.2 The MMP review process is the ideal mechanism for monitoring and promoting reduction in car use over time. The MMP can also ensure that corrective action can be implemented if required to ensure that the overall scheme meets or surpasses its overall MMP targets over time as improvement to sustainable travel modes and public transport comes on stream.
- 2.10.3 MMPs are evolutionary documents that should be regularly updated. In this way, MMP targets and plans will be reviewed and tailored to take account of ongoing changes in travel patterns.
- 2.10.4 As the Management Company will have a continued presence on site during the occupation stage it is ideally placed to monitor and review the overall performance of the initial MMP proposals and to where necessary take corrective actions, in advance of the occupation of subsequent phases of the overall development.
- 2.10.5 The MMP review can therefore assess the overall use and occupancy of the basement area for cars, cycles and storage areas and where necessary proposed changes to same to better meet the needs of the overall development and to further promote sustainable travel modes.
- 2.10.6 If required the MMP can in future reassign some of the retained car parking area in the basement to other uses that better meets the needs of the new residents of the area and better promotes sustainable travel patterns if same is deemed necessary or appropriate.

## 2.11 Other Proposed Changes Included in Retention Application

- 2.11.1 The increased substation size is an ESB requirement and will otherwise have no material impact in terms of traffic movements generated by the overall development.

## 2.12 Proposed Retention of Increased Basement Area

- 2.12.1 In terms of traffic generated by the proposed retention application ILTP have reviewed the assumed trip generation rates used in the Traffic and Transportation Assessment undertaken for the permitted development.
- 2.12.2 The trip generation rates used in the TTA accompanying the permitted SHD planning application used very robust trip generation assumption as is evidenced by the following extract from the TTA:

*“Table 4.3 shows a comparison between the updated TRICS rates and the Knockmaree residential development, as is evident the trip rate for the Knockmaree residential development is greater than the TRICS rates and as a result the donor site will be used to determine the traffic generation.*



Table 4.2 – Knockmaree Residential Development Observed Vehicle Traffic Generation and Trip Rates

160 Units	AM Peak Hour		AM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
Vehicle Trip Rates	0.075	0.225	0.238	0.131
Traffic Generation	12	36	38	21

Table 4.3 – TRICS Rate Vs Existing Development Trip Rate

Trip Rate	AM Peak Hour		AM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
TRICS	0.062	0.259	0.224	0.078
Knockmaree	0.075	0.225	0.238	0.131
Uplift / Difference	+0.013	-0.034	+0.014	+0.053

#### 4.3.1 Proposed Development Trip Generation

In order to determine the potential vehicle trip generation for the subject Palmerstown site, the trip rates for the Knockmaree donor site have been used, refer to Table 4.3 above. Accordingly Table 4.4 below indicates the predicted vehicle trip generation of the likely vehicle traffic flows travelling to/from the proposed subject development during the morning and evening peak hour periods.

Table 4.4 – Proposed Development Traffic Generations

Land Use	No of units/ GFA	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (16:00 – 17:00)	
		Arrivals	Departures	Arrivals	Departures
Residential	250 Units	20	60	63	35
Peak Hour Totals		20	60	63	35
80 Two-way		98 Two-way			

2.12.3 The trip rates assumed in the SHD assessment for the proposed development assumed relatively high trip generation rates, with no downward adjustment for the fact that the permitted development is directly adjacent to a Core Bus Corridor or that there is reduced car parking provision. The overall trips generated by the development with the proposed retention of some additional car parking spaces is therefore likely to be less than those forecasted in the planning application documentations.



### 3 SUMMARY

#### 3.1 Summary

- 3.1.1 ILTP have previously prepared the MMP that was submitted to SDCC as part of the compliance process. ILTP have recently visited the site, ILTP can confirm that all the key transport and movement related elements of the development have been completed and are in accordance with the permitted development.
- 3.1.2 The retention of the enlarged basement area is initially proposed for 18 additional car parking spaces and an increased storage area.
- 3.1.3 In summary, ILTP find that the overall development as constructed to date is to a very high standard with all the key transport elements included, particularly those that promote sustainable travel modes.
- 3.1.4 Based on the needs of the existing residents there is a justifiable need for additional car parking in the development and the retention of the additional car parking is recommended. The car overall parking provision will remain significant below the 2022-2028 CDP Zone 2 maximum car parking rates. This is further justified in the short term until the adjacent CBC is fully implemented, which is likely to be 2028 at the earliest.
- 3.1.5 The MMP review process is an ideal mechanism to monitor car parking over time and where appropriate to reduce same in response to increased sustainable mode share that may arise with the delivery of the CBC and changes to tenant mix and tenant needs.
- 3.1.6 As set out above, the proposed retention development is not likely to result in any material impact of traffic movements to and from the proposed development above that assumed in the TTA for the permitted development.
- 3.1.7 The changes to the ESB substation will have no material impact on the overall development as constructed.
- 3.1.8 The proposed changes as a result of the retention application are insignificant in traffic generation terms and will have no measurable impact on the overall traffic changes in the area. The traffic assumptions in the original TTA supporting the planning application were reviewed and found to be very robust and not dependant or assumptive of any car parking restrictions being imposed on the development.



**A APPENDIX A**

**A.1 Compliance Letter from SDCC**

**Eva Bridgeman,  
Downey Planning  
1, Westland Square  
Pearse Street  
Dublin 2.**

**Date : 15-Dec-2022**

**Reg. Ref. : SHD3ABP-307092-20C16  
Proposal :**

**Demolition of all existing structures on site and the construction of a residential development of 250 'build-to-rent' apartments in 5 blocks; with a cafe and ancillary residential amenity facilities. Block A- 27 apartments in a building ranging from 3-6 storeys over basement, with 1 communal roof garden and most apartments provided with private balconies/terraces. A cafe, reception/concierge with managers office and bookable space at ground floor level; meeting rooms and workspace/lounge at first floor level, a gym at second floor level; and a cinema and a games room at basement level; Block B- 46 apartments in a building 6 storeys over basement and all apartments provided with private balconies/terraces; Block C- 47 apartments in a building 6 storeys over basement and all apartments provided with private balconies/terraces; Block D- 67 apartments in a building 7 storeys over basement and most apartments provided with private balconies/terraces; Block E- 63 apartments in a building 8 storeys over basement and all apartments provided with private balconies/terraces. The development also includes the construction of a basement providing 120 car parking spaces, 10 motorcycle spaces, 250 bicycle spaces and a plant room and bin stores. The proposal also incorporates 5 car parking spaces and 26 bicycle spaces at surface level; upgrades and modifications to vehicular and pedestrian/cyclist access on Kennelsfort Road Lower; utilisation of existing vehicular and pedestrian/cyclist access via Palmerstown Business Park; 1 ESB sub-station; landscaping including play equipment and upgrades to public realm; public lighting; boundary treatments and all associated engineering and site works necessary to facilitate the development.**

**Compliance with condition 16; Mobility Management Plan**

**Location :** **Lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20, D20 AE04**

**Applicant :** Randelswood Holdings Ltd.  
**Application Type:** Compliance with Conditions

Dear Sir/Madam,

I refer to your submission received on 21-Oct-2022 to comply with Condition No. 16 of Grant of Permission No. SHD3ABP-307092-20, in connection with the above.

In this regard I wish to inform you that the submission received is satisfactory.

Yours faithfully,

M.C.

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*for Senior Planner*