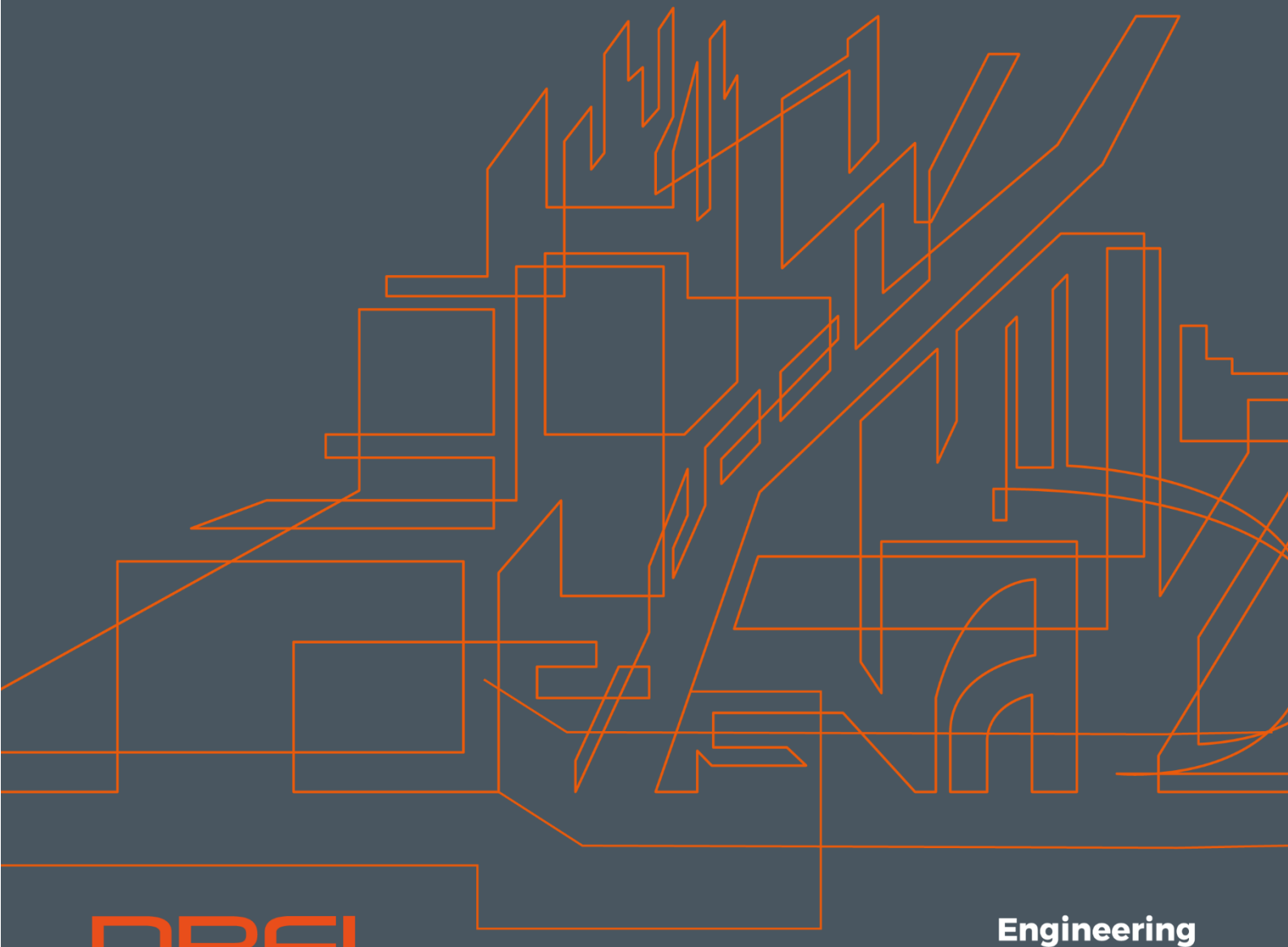
Amendments to Permitted Development of Royal Liver Retail Park Phase 2

Traffic and Transport Assessment Report

260024-X-90-X-XXX-RP-DBFL-CE-0001

September 2026



DBFL CONSULTING ENGINEERS

Engineering Sustainable Futures

Project Title:	**Amendments to Permitted Development of Royal Liver Retail Park Phase 2**		
Document Title:	**Traffic and Transport Assessment Report**		
File Ref:	**260024-X-90-X-XXX-RP-DBFL-CE-0001**		
Status:	**P3 - Planning**	Rev:	**2**
	S - Issued		

Status	Rev.	Date	Description	Prepared	Reviewed	Approved
P1	0	15/06/26	Draft-For Preplanning	MNV	VJ	TJ
P3	0	18/06/26	For Preplanning	MNV	VJ	TJ
P3	1	16/09/26	Draft for Planning	VJ	TJ	TJ
P3	2	24/09/26	Final	VJ	TJ	TJ

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1 INTRODUCTION

1.1 BACKGROUND

DBFL Consulting Engineers (DBFL) has been commissioned by Land Development Agency (LDA) to compile a Traffic and Transport Assessment in support of proposed amendments to the permitted Phase 2 element of proposals (DCC Ref. 4238/19, ABP Ref. PL29S.307804 as amended by DCC Ref. 4436/23 and granted permission by the Local authority DCC Ref. 5050/26) for the redevelopment of the Royal Liver Retail Park, Naas Road, Dublin.

1.2 RECENT PLANNING HISTORY

1.2.1 2019 Scheme (4238/19; ABP Ref. PL29S.307804)

Planning permission was granted on the 20th November 2020 by An Bord Pleanála (hereafter referred to as the 'Original Permission') for the redevelopment of the Royal Liver Assurance Retail Park to provide a mixed-use development comprising residential, office, crèche, community, retail, café /bar/restaurant, medical centre, pharmacy uses and all ancillary works; comprising 9 No. buildings ranging in height from 7 to 18 storeys over basement level, with a total GFA of c.129,210m^2, plus c. 31,413m^2 relating to ancillary car parking, bicycle parking, plant, waste storage facilities, storage, services, including at ground (sub-podium) and basement levels.

1.2.2 Permitted Amendments 2023 Scheme (4436/23)

Amendments to the 2019 Scheme were granted by DCC on the 15th of February 2024 (hereafter referred to as the '2023 Amendment Permission) . The amendments consisted of changes to the plans such that the parking is allocated on a proportional basis for each phase. The amendment application included removing the basement under Phase 1 (Blocks E1, E2, F1 & F2), retention of the podium parking in support of that phase and inclusion of a new basement car park under Blocks B1 & B2, reconfiguration of commercial units at ground floor level of Block E1 and Block F2, provision of additional residential amenity area, omission of 4 no. apartments at ground floor level, minor amendments to the proposed landscaping and all other associated works.

1.2.3 Permitted Amendment to Phase 1 (5050/26)

Permission was granted to the amendment application to Phase 1(hereafter referred to as the 'Phase 1 Application') on August 2026 which was lodged with Dublin City Council to amend the permitted Block E1 to replace the permitted 203 no. unit shared accommodation block with a residential apartment block containing 98 no. units. This 2026 amendment application also

included removal of permitted part basement under Block E1 accommodating sprinkler and water tanks, storage, plant rooms, tank and waste storage, and the removal of permitted vehicular (ramped) accessed from ground level, below podium, at Block E1 to basement level under adjacent Blocks B1 and B2. The permission also includes:

- the subsequent relocation of this plant to ground level below Block E1
- reconfiguration of the permitted podium entrance to Blocks E1, E2, F1 and F2 from the Old Naas Road to include 2 new set down/delivery bays and waste truck collection bay,
- minor amendments to permitted landscaping around the car park entrance and the residential and amenity entrances at ground floor level and podium level (communal courtyard) adjacent to Block E1 and Amendment to permitted phasing plan.

1.3 OBJECTIVE

The purpose of this report is to assess and quantify:

- The key accessibility characteristics of the existing local receiving environment,
- The proposed method of access for pedestrians, cyclists and vehicles travelling to / from the proposed residential development, and
- The level of traffic impact associated with the development proposals on external site junctions relative to the 2023 planning permission(4436/23).
- To present/illustrate how delivery and servicing activities within the proposed development are to be managed and have been accommodated within the scheme design.

1.4 SCOPE OF ASSESSMENT

The scope of the assessment covers transport and sustainability Issues including access, pedestrian, cyclist, and public transport connections. Recommendations contained within this report are based on existing and proposed road layout plans, site visits, on site traffic observations and the review of junction vehicle turning count data.

During the development of this report, traffic surveys have been undertaken specifically for this assessment, with the objective of providing up to date background information relating to existing traffic movement patterns across the local road network surrounding the subject development site. This information has been supplemented with data obtained from site audits of the local road

network, subsequently enabling the identification of existing local travel characteristics and an appreciation of the local receiving environment from a transportation perspective.

1.5 METHODOLOGY

Our approach to the study accords with policy and guidance both at a national and local level. Accordingly, the adopted methodology responds to best practices, current and emerging guidance, exemplified by a series of publications, all of which advocate this method of analysis. Key publications consulted include: -

- Traffic and Transport Assessment Guidelines (May 2014) TII.
- Traffic Management Guidelines' Dublin Transportation Office & Department of the Environment and Local Government (May 2003);
- Design Manual for Urban Roads and Streets (DMURS) (2019);
- *'National Sustainable Mobility Policy Action Plan 2022-2025'*
- Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025
- Dublin City Development Plan 2022 - 2028.
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

Our methodology incorporated a number of key inter-related stages, including;

- **Policy Review**: A review of relevant traffic and transportation policy was undertaken. The policy framework and development management standards reviewed aligns with national and local policies, adhering to best practices and emerging guidance.
- **Site Audit:** A site audit was undertaken to quantify existing road network issues and identify local infrastructure characteristics, in addition to establishing the level of accessibility to the site in terms of walking, cycling and public transport.
- **Traffic Counts:** A Junction Turning Count (JTC) survey was undertaken and analysed with the objective of establishing local traffic characteristics in the immediate area of the proposed development.
- **Trip Generation:** A trip generation exercise has been carried out to establish the potential level of vehicle trips that could be generated by the proposed development.

- **Trip Distribution:** Based upon both the existing and future network characteristics, a trip distribution exercise has been undertaken to assign site generated vehicle trips across the local road network.
- **Network Impact:** The specific level of influence generated by the proposed development upon the local road network was ascertained and the junctions which required assessment in greater detail were identified.

1.6 REPORT STRUCTURE

This report seeks to quantify the potential level of influence generated by the proposed development upon the local road network and subsequently ascertain the existing and future operational performance of the local transport system. The structure of the report responds to the various stages of this exercise including the key tasks summarised below.

Chapter 2 of this report describes the existing conditions at the proposed development location and surrounding area, whilst **Chapter 3** provides a summary of the relevant transport policies that influence the design and appraisal of the subject proposal.

A description of the proposed development scheme from a transportation perspective is described in **Chapter 4** whilst **Chapter 5** outlines the development parking management strategy. The vehicle trip generation and distribution exercise carried out and the adopted methodology for applying growth factors to establish design year network traffic flows and the predicted scale of impact upon the local road network are detailed in **Chapter 6**. DBFL's responses to the planning authorities LRD opinion in regard to traffic and transportation matters is summarised in **Chapter 7.**

The main conclusions and recommendations derived from the analysis are summarised in **Chapter 8**.

2 RECEIVING ENVIRONMENT

2.1 LOCATION

The subject site is located between the Inchicore and Drimnagh neighbourhood centres with Dublin city centre approx. 5.8km to the north-east of the site. The area offers connectivity between various suburbs of Dublin via the R810 Naas Road, with the site having approximately 200m of road frontage along the R810 Naas Road. The site has approximately 170m of road frontage onto the R112 Kylemore Road which connects the site northwards to the R148 Chapelizod Bypass and to the south to the aforementioned Naas Road R810 and R110 Long Mile Road corridor. To the north the Old Naas Road corridor forms the northern boundary of the subject development site. The M50/N7 Junction 9 Interchange ('Red Cow Interchange') is approx. 2.4 km southwest of the subject site and offers many forward connections. The general location of the subject site in relation to the surrounding road network is illustrated in **Figure 2-1** below whilst **Figure 2-2** indicatively shows the extent of the subject site boundary and neighbouring lands.



Figure 2-1: Site Location (Source: Google Map) Minutes)

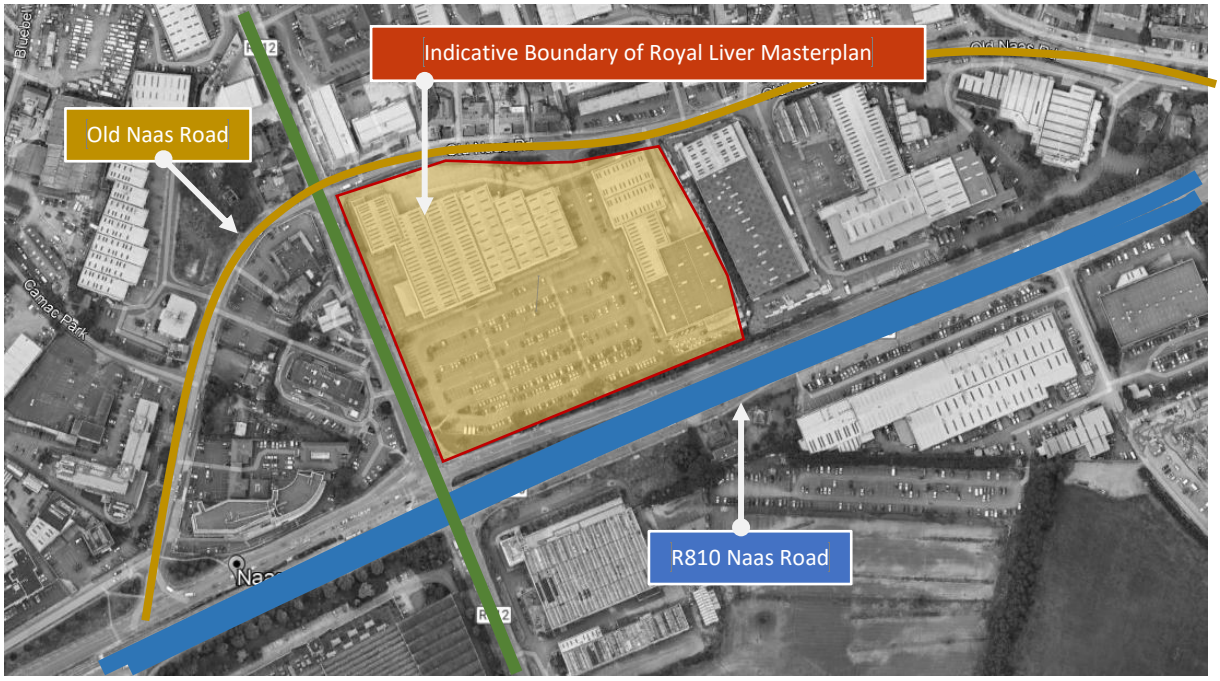


Figure 2-2: Indicative Site Boundary (Source: Google Maps)

2.2 LAND USE

The subject site is a brownfield site which until recently operated as a commercial retail park (Royal Liver Retail Park) comprising approx. 12,800m^2 GFA across 8 units. The subject lands are zoned ***Zone 14- Strategic Development and Regeneration Areas*** within DCC Development Plan 2022-2028 as shown in **Figure 2-3**.

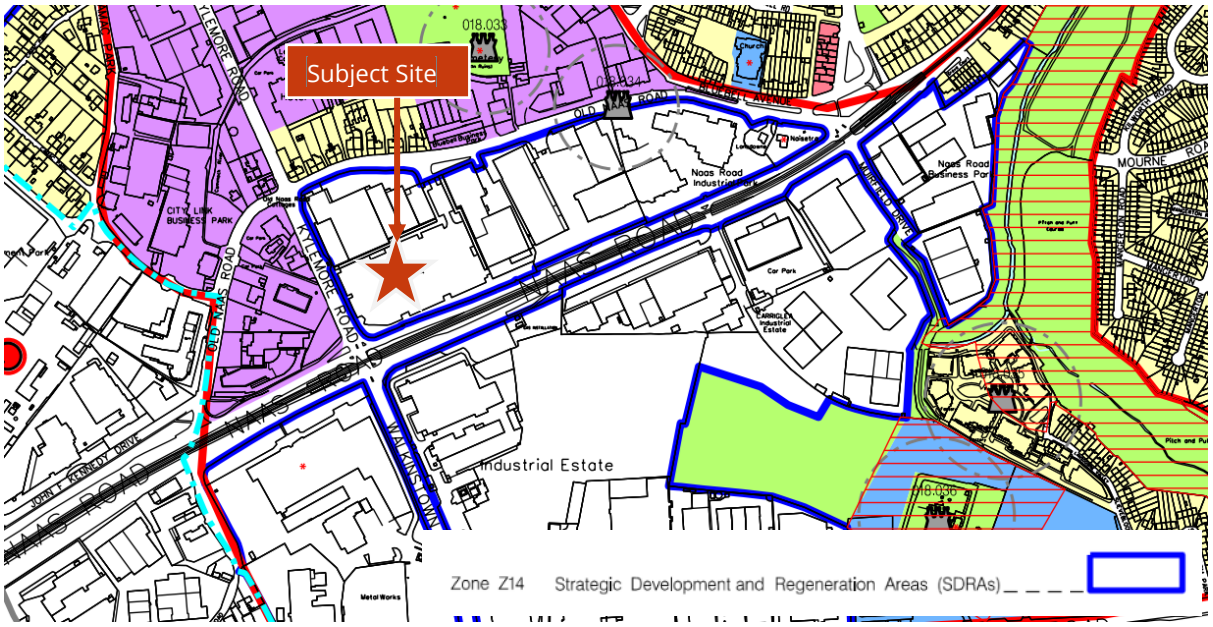


Figure 2-3: Land Use Zoning (Source: Extract from Map G of Dublin City Development Plan 2022-2028)

2.3 EXISTING TRANSPORT FACILITIES & SERVICES

2.3.1 Existing Cycling and Pedestrian Facilities

The roads bounding the subject site (Kylemore Road (R112), Old Naas Road and Naas Road (R810)) are subject to speed limits between 50 - 60kph. Street lighting is available on both sides of the road for the Kylemore Road (R112) and the Naas Road (R810).



Figure 2-4: Pedestrian Facilities along Naas Road, Old Naas Road and R112 Kylemore Road

Pedestrians can benefit from footpaths on both sides of the carriageway on the Kylemore Road (R112), the Naas Road (R810) and the Old Naas Road, as shown in **Figure 2-4.** There is currently no dedicated cycle infrastructure along either the Naas Road (R810), the Kylemore Road (R112) or the Old Naas Road in the immediate vicinity of the Royal Liver Retail Park site. Pedestrian crossing facilities in vicinity of the subject site are illustrated in **Figure 2-5** the below.

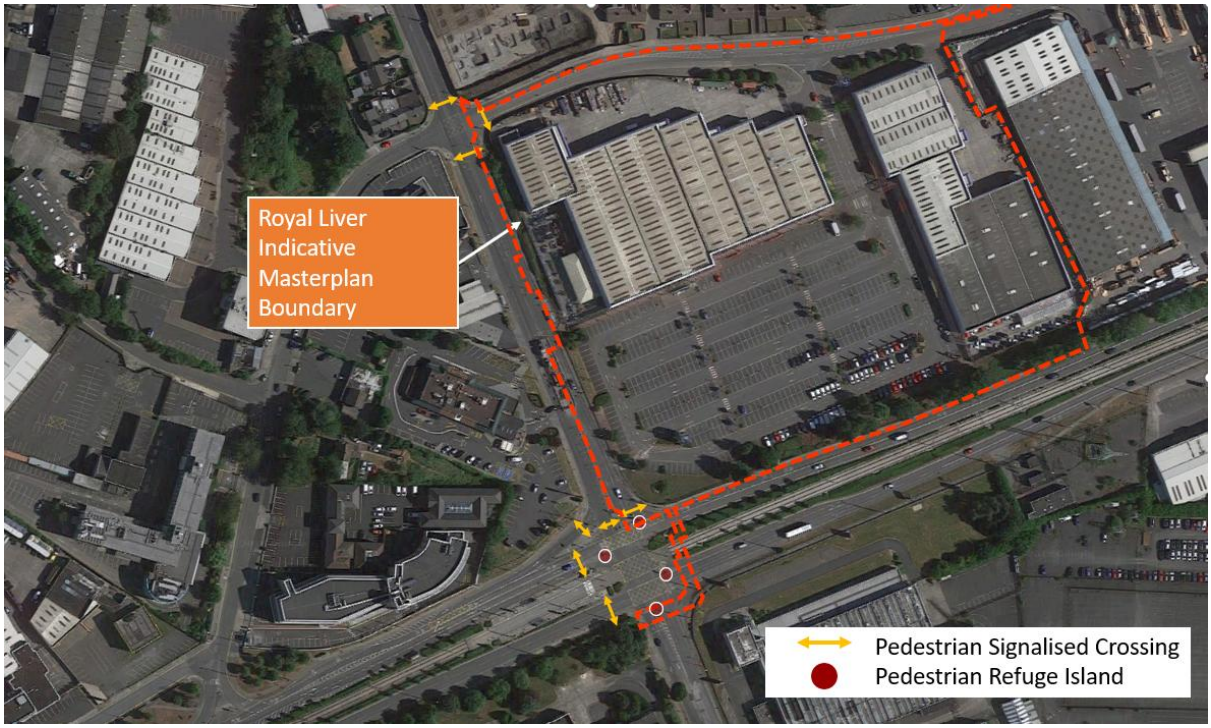


Figure 2-5: Pedestrian Crossing Facilities along Naas Road, Old Naas Road and R112 Kylemore Road

Cyclists can also benefit from the use of a bus lane along the eastern stretch of the Naas Road.

The site also benefits from being approximately 400m south of the Grand Canal Greenway which can be accessed via Kylemore Road (R112). There are currently no cycle facilities on the Kylemore Road (R112) or on the Old Naas Road.

2.4 EXISTING PUBLIC AND SHARED TRANSPORT SERVICES

2.4.1 Baseline Service

The baseline PTAL (Public Transport Accessibility Analysis) characteristics (prior to emerging BusConnects CBC and emerging LUAS Lucan and Dart+ Southwest facilities) is detailed **Figure 2-6** below revealing a predominately **Medium-High** level of service with an adjoining **High** level of service overlapping into the southeast portion of the subject site due to the proximity of the LUAS interchange.

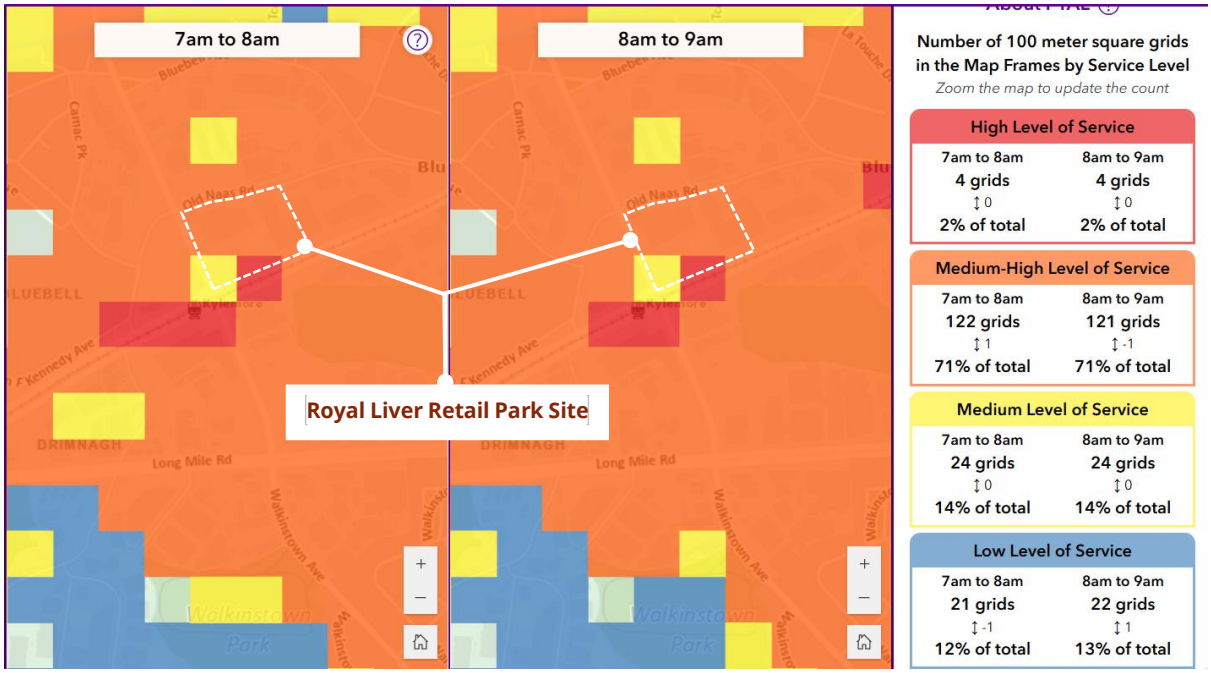


Figure 2-6: NTA's PTAL Service Level (Source NTA)

2.4.2 Bus Services

Royal Liver Retail Park benefits from the provision of bus interchange opportunities on both the Kylemore Road and Naas Road corridors. Bus stops (with weather protection) are available on both sides of the Kylemore Road corridor which service the Go-Ahead operated orbital route S4 (10-minute frequency) between UCD Belfield and Liffey Valley Shopping Centre.

East-west services operating along the R810 Naas Rd corridor and calling at bus stops (with weather protection) in close proximity to Royal Liver Retail Park site include Route 13 (between Harristown - Grange Castle with 12-minute frequency), and Route 68/68X (between Newcastle – Hawkins St with 30-minute frequency). The two bus stops on Kylemore Rd and the inbound bus stop on Naas Road all benefit from the provision of real-time bus service public information displays.

2.4.3 Bus Infrastructure

The R810 Naas Road currently accommodates dedicated nearside bus lanes on both sides of the corridor for the benefit of inbound and outbound bus services. Whilst a very generous width of carriageway is available; no dedicated bus lanes are currently delineated along the R112 Kylemore Rd corridor.

2.4.4 Light Rail Services

The Kylemore LUAS Stop on the Naas Road (R810) is the most accessible LUAS stop to the subject site. It is approx. 150m to the south of the site; its location is shown in **Figure 2-7** below.

The Bluebell LUAS Stop is approx. 750m east of the subject site. The LUAS Red Line provides access to Tallaght and Saggart in the western ends of the line, Connolly Station and the Point Village in the eastern ends of the line, as well as the city centre and interchange points with the LUAS Green Line and to other destinations along its route. **Table 2-1** below lists how often (in minutes) the service operates at the Kylemore Stop (both eastbound and westbound routes).

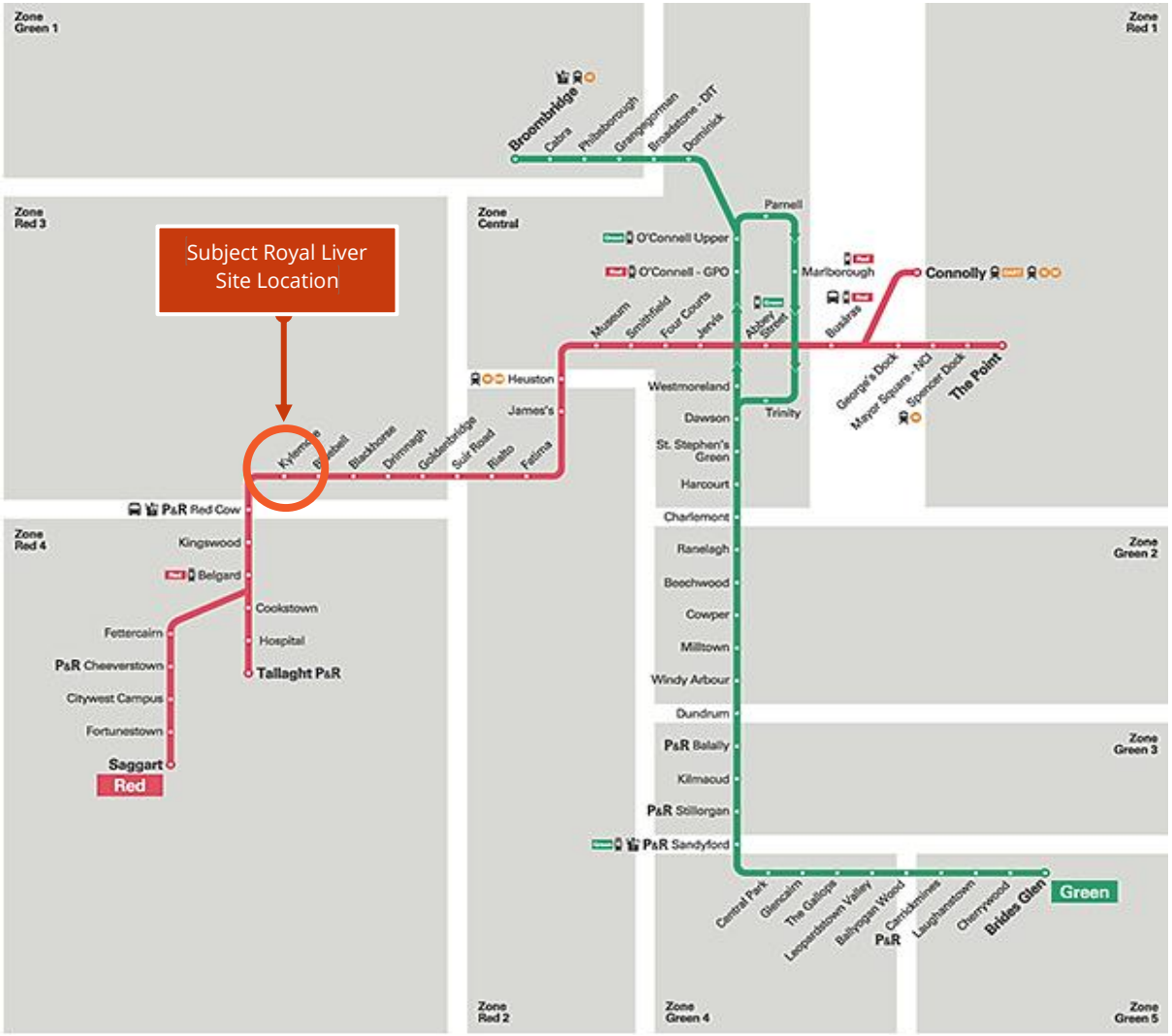


Figure 2-7: LUAS Red Line Destinations (Source: NTA)

Eastbound		Westbound	
Time Range	**Mon – Fri (Average Frequency in Minutes)**	**Time Range**	**Mon – Fri (Average Frequency in Minutes)**
05:33-07:00	15	06:02-07:00	15
07:00 - 10:00	4	07:00 - 10:00	4
10:00 - 16:00	4	10:00 - 16:00	4
16:00 - 19:00	4	16:00 - 19:00	4
19:00 - 00:16	10	19:00 – 01:01	10
Time Range	**Sat (Average Frequency in Minutes)**	**Time Range**	**Sat (Average Frequency in Minutes)**
06:30 - 10:00	8	07:03-10:00	10
10:00 - 16:00	5	10:00 - 16:00	5
16:00 - 19:00	5	16:00 - 19:00	5
19:00 - 00:16	7	19:00 – 01:03	10
Time Range	**Sun & Bank Holidays (Average Frequency in Minutes)**	**Time Range**	**Sun & Bank Holidays (Average Frequency in Minutes)**
07:02 - 12:00	-	07:33 - 12:00	13
12:00 - 19:00	6	12:00 - 19:00	6
19:00 - 23:16	12	19:00 – 00:03	7

Table 2-1: LUAS Kylemore Stop Average Service Frequency (In Minutes)



Figure 2-8: Luas Stop Locations Relative to Site (Source: Google Maps)

2.4.5 Heavy Rail

The closest existing railway stations to the subject site are Heuston Station (for intercity / regional / commuter services) as located 4.1 km to the northeast (12-minute cycle / 17-18 minutes by public transport or 8 minutes by car), and Park West / Cherry Orchard as located 3.1 km to the northwest (11 minute cycle / 20 minutes by public transport or 6 minutes by car),

The most accessible rail station to the subject site is the Park West & Cherry Orchard Station, located approx. 3.1km northwest of the site as illustrated in **Figure 2-9**. From this station, onward connections at Heuston Train Station and Connolly Train Station can be made.

The subject site is also located approx. 4.1km from Heuston Station (northeast from subject site) and approx. 7.5km from Connolly Train Station (northeast of subject site). Both of these train stations can be accessed from the subject site via LUAS Red Line interchange stops adjacent to each station; Heuston Station is accessed with a journey time of 15 minutes using the Luas Red Line. Together both stations provide intercity and commuter train services while Connolly Train Station offers additional DART (Dublin Area Rapid Transit) services.

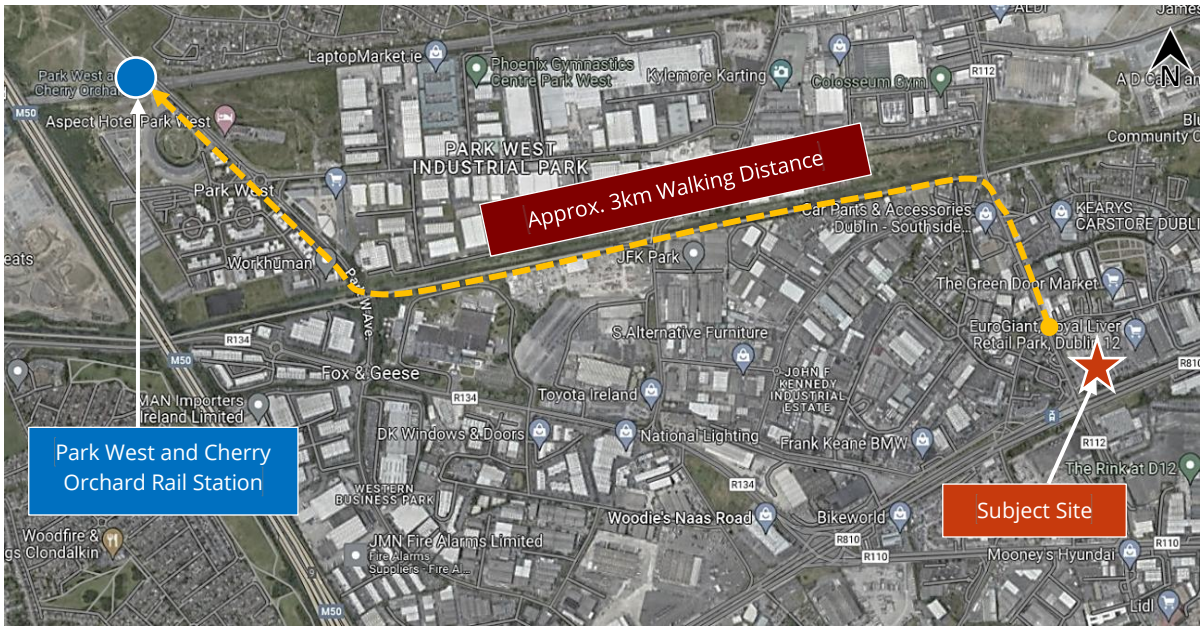


Figure 2-9: Existing Rail Station Locations Relative to Site (Source: Google Maps)

2.4.6 Car Share Services

GoCar maintains two car-sharing bases in close proximity to the subject site, at:

- Our Lady of the Wayside Carpark, Bluebell Avenue (approx. 400m / 5-min walk to the east);
- Landsdowne Gate Apartments (approx. 1.1km / 14-min walk to the southeast).

Both bases offer pay-as-you-go car hire services via GoCar's mobile app, with GoCar services generally available 24/7.

2.4.7 Existing Site Accessibility

All the above existing transport options contribute to delivering excellent accessibility levels at the subject site even in advance of the new bus light rail and heavy rail enhancement that are being proposed by range of stake holders across the immediate environment of the subject royal liver site. This existing baseline accessibility is demonstrated in the following figures (Appendix A)

- Figure 1: Healthcare facilities within a 15-minute walk and cycle journey
- Figure 2: Education facilities within a 15-minute walk and cycle journey
- Figure 3: Retail (Food) facilities within a 15-minute walk and cycle journey
- Figure 4: Extent of 15-minute catchment by existing public transport services.
- Figure 5: Accessibility levels of Primary Schools within 15 minutes walking
- Figure 6: Accessibility levels of Secondary Schools within 15 minutes walk and cycle
- Figure 7: Accessibility levels of Third level Institution within 15 minutes Cycling

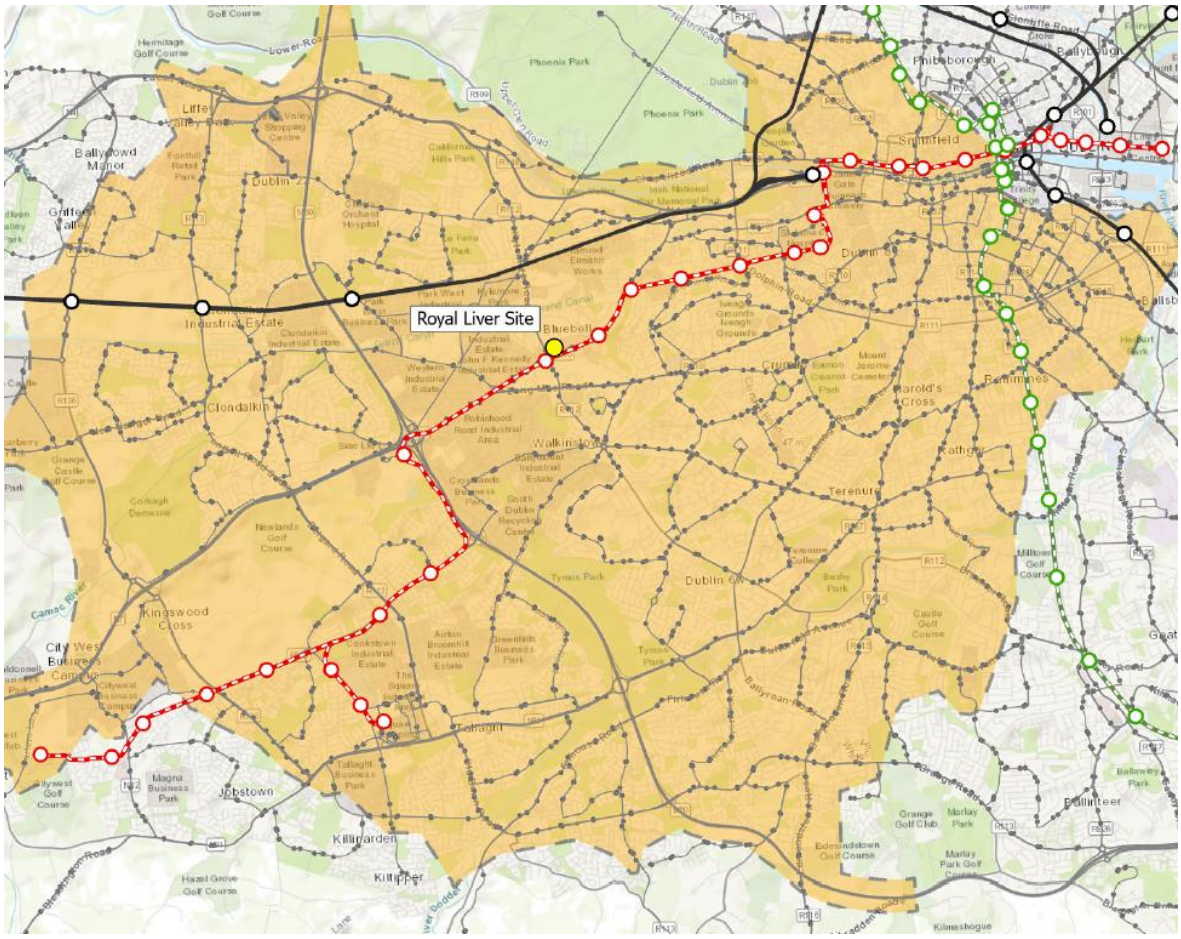


Figure 2-10: Baseline Public Transport 15 Minute Catchment from Subject Site

2.5 PROPOSED TRANSPORT INFRASTRUCTURE

2.5.1 Introduction

The following section considers a number of proposals that have emerged in the interim period since 2023 application, but which have the potential to influence the design of the subject Phase 2 amendments beyond that already established by the existing planning permissions and associated planning conditions. Whilst located within Dublin City Council jurisdiction the subject brownfield site lies in close proximity to the boundary with lands governed by South Dublin City Council. Accordingly transboundary parameters need to be considered with the most notable initiative impacting the Royal Liver site being the City Edge project as being jointly implemented by both local plaining authorities in addition to a number of transport-oriented schemes being rolled out by the NTA and TII.

2.5.2 City Edge Project

The City Edge Project is a transformative cross boundary initiative by DCC and SDCC, re-imagining the Naas Road, Ballymount and Park West areas at the western edge of Dublin City. A Strategic Framework has been complied that seeks to set out a high-level approach and transformational trajectory for the regeneration of the defined City Edge brownfield lands to create a new liveable, sustainable and climate resilient urban quarter. It will be followed in due course by a more comprehensive statutory plan which will guide development at a finer level of detail.

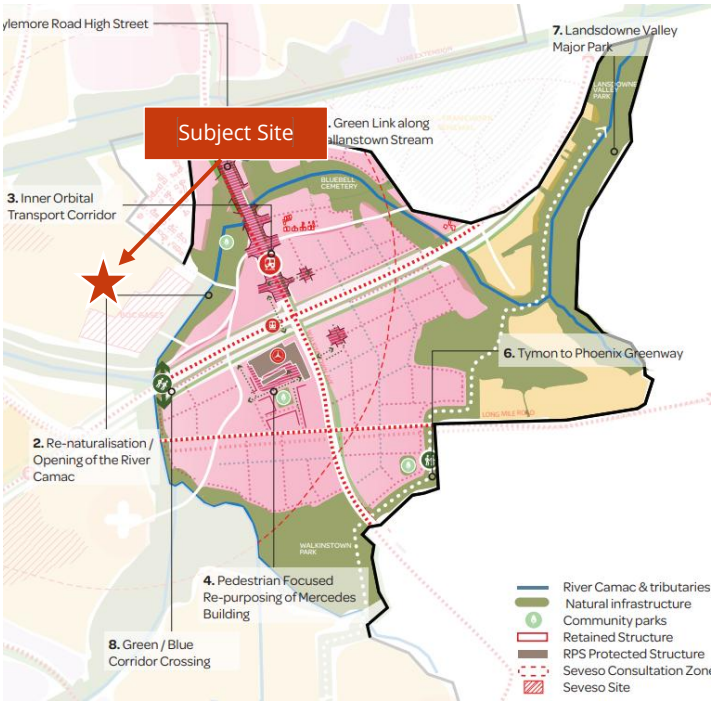


Figure 2-11 Outline of the City Edge Project with the subject site marked.

The City Edge framework comprises five districts with defining elements of land use, centres & high streets, the movement network & natural infrastructure. The subject Royal Liver Park site is located within the "Naas Road" district. Due to its key locational advantages and existing development profile the framework plan identifies the Naas Road district as "***the Primary Town Centre in City Edge***" with extant planning permissions taken into consideration in the development of the plan.

The framework plan for the Naas Road district includes for:

- A mixed-use urban centre
- A "***high street***" character along Kylemore Road
- An inner orbital public transport corridor (along Kylemore Rd – Walkinstown Ave corridor) identified with an interchange located "***north of the intersection with the Naas Road***."
- Old Naas Rd being reclassified as a "***Major Link Road***"

The adopted movement strategy for the City Edge area is presented in the Figure 2-12 below.

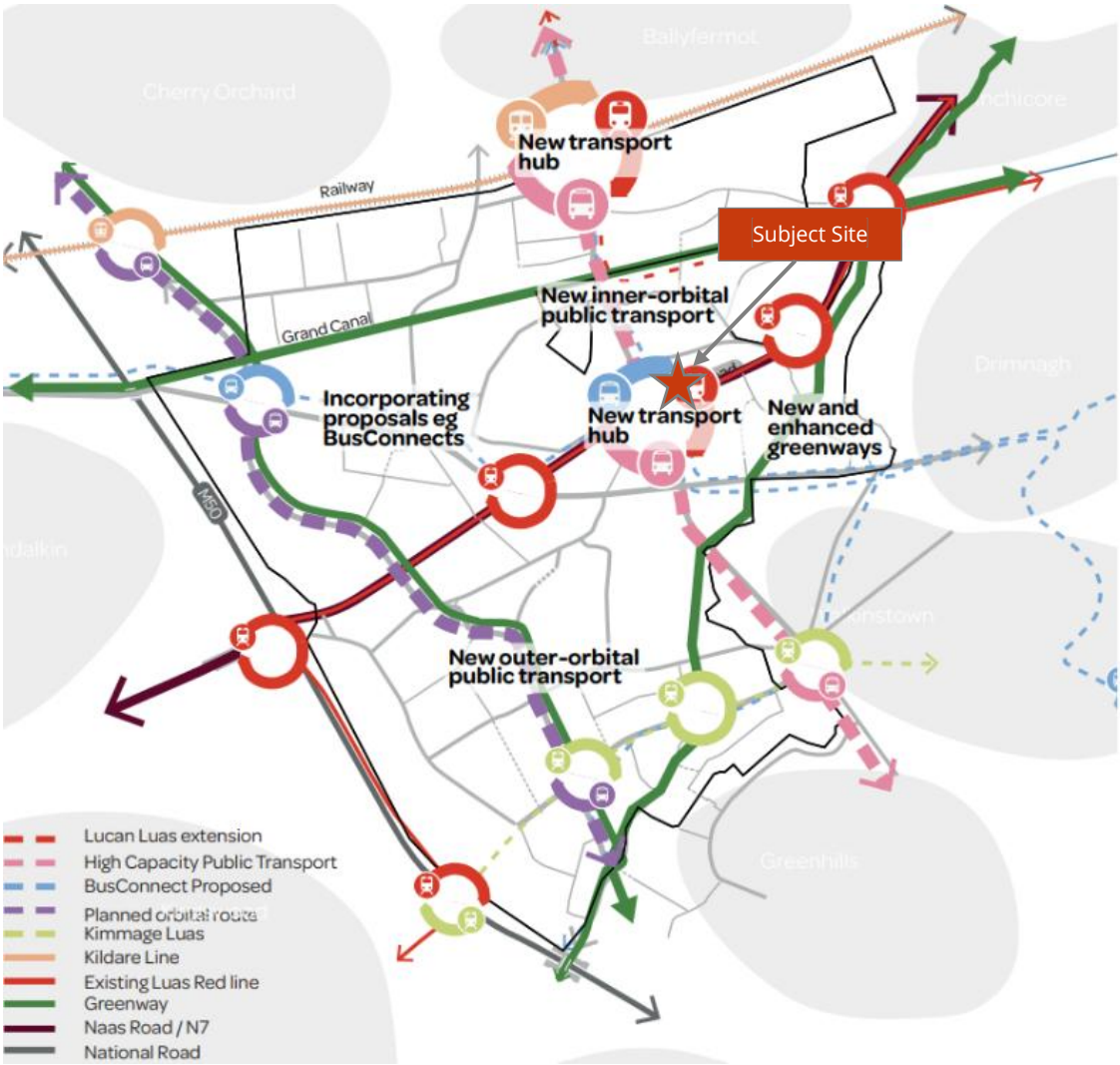


Figure 2-12 Transport Proposals for City Edge with subject site identified.

The key transport components relevant to the Royal Liver site include:

- New transport hub (Bus / LUAS) identified at the Naas Rd / Kylemore Rd Junction.
- New inner orbital public transport interchange on Kylemore Rd adjoining the subject Royal Liver Retail Park site.
- New LUAS Lucan line adjoining the Grand Canal corridor (between Kylemore Road and Blackhorse Bridge) and along Kylemore Rd to/from the Ballyfermot direction.
- New DART Commuter station on Kylemore Rd with new 'Transport Hub' for interchange with LUAS and Orbital bus circa 985m to the north of the subject Royal Liver Site.

2.5.3 CYCLING INFRASTRUCTURE

NTA Cycle Connects

The Greater Dublin Area (GDA) Cycle Connects network proposals were updated in January 2023 by the NTA. The latest network proposals, which supersedes the earlier 2013 version, includes for the following elements (reference **Figure 2-13** below) ;

- A 'feeder' route (Kylemore Rd-Old Naas Rd) through the subject Royal Liver Site.
- 'Primary Orbital' north-south along the Kylemore Rd – Walkinstown Ave corridor.
- A 'secondary' route along Old Naas Rd
- "Further Study" for the route along Naas Road to the east of its junction with Kylemore Rd

Influenced in part by BusConnects CBC proposals and the extant planning permission the new 2023 network proposals include:

1) A "**feeder**" route through the subject Royal Liver Site as per the general arrangement of the proposed developments central public realm area.
2) A "**secondary**" route along the entire length of Old Naas Rd (to the west and east of Kylemore Rd corridor), and
3) A "**feeder**" route adjoining Bluebell Cemetery connecting Old Naas Rd and Bluebell Ave subsequently providing a convenient active travel route between the subject Royal Liver site and the Greenway along The Grand Canal (accessed via Bluebell LRD site at Bluebell Waterways, Bluebell Avenue and Bluebell Road, Bluebell, Dublin 12)

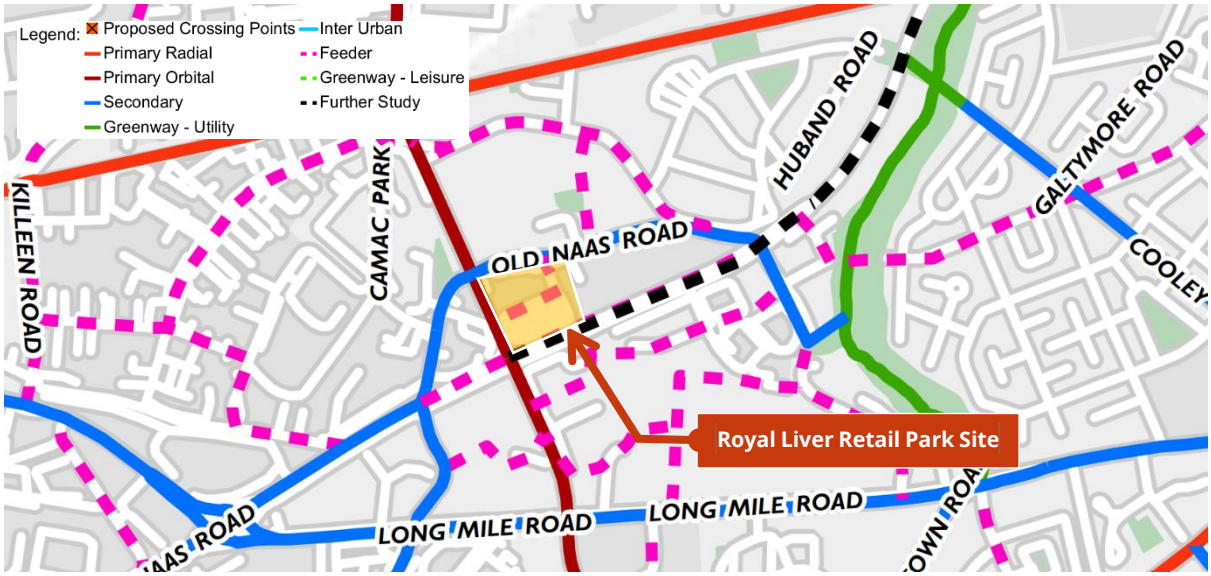


Figure 2-13: NTA's GDA Cycle Connects Network Proposals (January 2023)

2.5.4 DCC Active Travel Programme

The NTA's Cycle Connects infrastructure will be delivered through a number of different projects as and when opportunities permit. The NTA's Bus Connects include the construction of certain elements of the cycle connects network proposals including the section of Naas Rd corridor to the west of Kylemore Rd and along the length of Walkinstown Ave. DCC identifies a total of 80 active travel schemes over the lifetime of their current Active Travel Programme. The latest DCC status of works (Quarterly Report Q1 March 2026) details:

- Works along Kylemore Rd are identified as being part of the Chapelizod to Walkinstown project. Whilst no specific details are available on this specific project, DCC (About the Active Travel Programme | Dublin City Council) suggest that this project (Design / Consultation) will commence "Post 2028".
- Along the Naas Rd corridor between Naas Rd / Kylemore Rd / Walkinstown Ave junction and Inchicore the "Naas Rd to Inchicore" project is reported to start design works in 2026 with a public consultation exercise "expected" to be also undertaken in 2026.
- Whilst included in 2023 GDA Cycle Connects network, the DCC Active Travel Programme does not include any detail (either ongoing or classified as "in Future") of any project for cycle infrastructure design / consultation / construction along the Old Naas Road.

2.5.5 NTA BusConnects Dublin

The emerging BusConnects Core Bus Corridor (Clondalkin / Tallaght Scheme) is to be routed east-west along the western section of the Naas Road corridor, via the Naas Rd / Kylemore Rd junction and north-south along the Walkinstown Ave corridor. The original 2019 planning application on the subject Royal Liver Retail Park site safeguarded the implementation of the NTA's BusConnects Core Bus Corridor as proposed at that time.

In the interim period, the publication of the NTA's new Cycle Design Manual (September 2023) necessitated that the CBC works, including the layout of the proposed Naas Rd / Kylemore Rd / Walkinstown Ave junction, be updated to reflect the new design guidance. In October 2024 ABP granted planning permission for the Clondalkin / Tallaght CBC Scheme. The extant Royal Liver planning permission included works to both (i) the Naas Rd / Kylemore Rd junction and (ii) the eastern side of Kylemore Rd (relocating bus stop). These works (which are to be undertaken as part of the earlier Phase 1 scheme) have been revisited in the accompanying DBFL Roads Layout Drawing to ensure their design is compliant with the latest BusConnects CBC proposals and the NTA's cycle design manual guidance.

2.5.6 TII LUAS

LUAS RED Line

One of the key sustainable accessibility credentials of the subject Royal Liver Retail Park site is its proximity to the existing Kylemore interchange (circa 60m walk) on the LUAS Redline light rail network. Now over 20 years old, TII is ongoing investment in the LUAS Red line operations under the National Development Plan includes proposals for:

- Replacement of Red Line Fleet (2028-2029)
- Upgrade to Red Cow Interchange and Depot, and
- New LUAS interchange on the Naas Road to service the City Edge project (Nangor Road)

LUAS Lucan

TII are currently working on proposals for the Luas Lucan scheme which seeks to implement a new light rail line between the city centre (via Rialto, Blackhouse, Ballyfermot and Liffey Valley) and Lucan / Adamstown. In accordance with the NTA's GDA Transport Strategy this scheme is to be completed and operational prior to 2042. The proposals will see a new LUAS interchange located on Kylemore Rd potentially some 500m to the north of the subject Royal Liver site. Whilst not directly impacting the subject development site, the delivery of the LUAS Lucan scheme will further enhance the sustainable accessibility levels of the development which in return provides the

opportunity to instigate changes to the Royal Liver site development's car parking strategy and associated reduction in car parking provision for residents compared to that already permitted at the subject site.

2.5.7 Irish Rail

DART+ Southwest project provides the opportunity (byway of the implementation of four tracking layout between Park West and Heuston) and details the future delivery (as part of a separate project) for a new Commuter railway station on Kylemore Road. The location of this potential future railway station on the extended DART network is only 1km to the north of the Royal Liver Retail Park site as illustrated in **Figure 2-14** below.

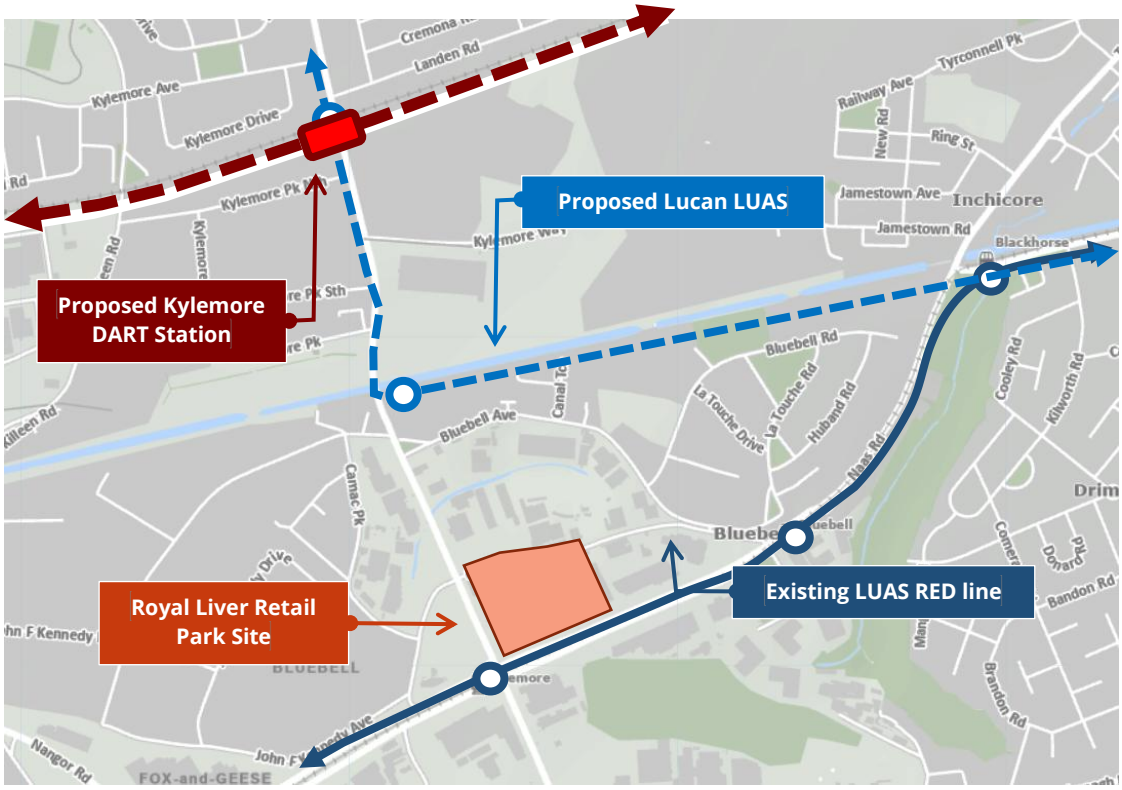


Figure 2-14: Proximity to Proposed Kylemore Rail Station and LUAS Interchanges.

In addition, this new DART railway station on Kylemore Road is identified as a new Rail / LUAS / Bus interchange in the City Edge project framework documentation. The offering up to 23 DART trains with capacity to carry 20,000 passengers per hour further enhances the choice of sustainable travel options at the subject site subsequently influencing the mobility strategy for the proposed Royal Liver redevelopment in the long term. Irish Rails initial proposal (Ref. **Figure 2-15**) for the new Kylemore Rd DART station were available for public consultation between 8th September and 3rd October 2025.



Figure 2-15: Emerging Irish Rail Option for Kylemore Rail Station.

3 POLICY FRAMEWORK AND DEVELOPMENT STANDARDS

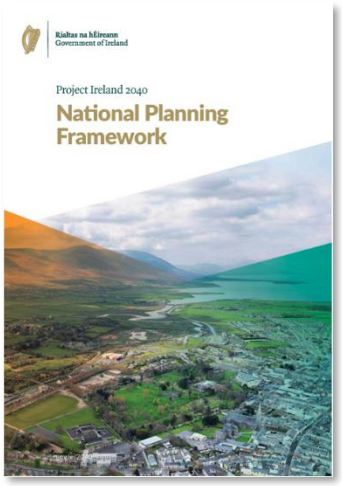
3.1 INTRODUCTION

In the context of transportation, the subject site policy framework is founded on the following key documents. A common theme through each of these key documents is the emphasis placed upon the importance of travel demand management, with many identifying the need to implement mobility management plans with the objective of promoting sustainable travel patterns. These documents include:

- National Planning Framework (2018)
- National Sustainable Mobility Policy
- Design Manual for Urban Roads and Streets (DMURS) (2019)
- Sustainable Residential Development and Compact Settlements (2024)
- Planning Design Standards for Apartments (July 2025)
- Greater Dublin Area Transport Strategy 2022-2042
- Dublin City Development Plan 2022-2028

3.2 NATIONAL PLANNING FRAMEWORK

The National Planning Framework (NPF) is a strategic development framework that sets out the long-term vision for the future growth and spatial development of Ireland up to 2040. The NPF is underpinned by a set of National Strategic Outcomes (NSOs). The framework works towards delivering 10 National Strategic Outcomes (NSO) of which three are particularly relevant to the development of the Royal Liver site:

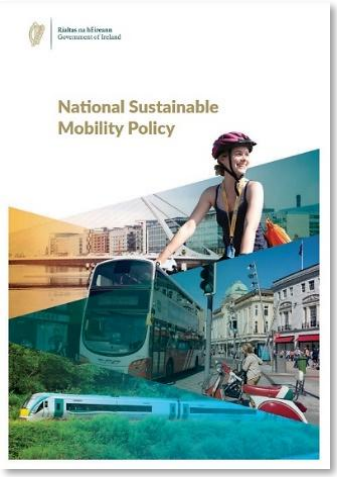


- NSO 1. Compact Growth
- NSO 4. Sustainable Mobility
- NSO 8. Transition to a Low Carbon and Climate Resilient Society.

The first revision of the National Planning Framework was adopted in 2025. It maintains the 10 NSOs of the original National Planning Framework, while setting out the need to plan for a

significant increase in housing supply every year between now and 2040 to meet the housing needs associated with Ireland's projected population growth. Whereas the 2018 NPF calculated that Ireland would require a provision of at least 275,000 new homes by 2040, the Revised NPF published in 2025 supersedes this figure and confirms "a projected total requirement to accommodate approximately 50,000 additional households per annum to 2040".

3.3 NATIONAL SUSTAINABLE MOBILITY POLICY



The National Sustainable Mobility Policy was published in April 2022 by the Department of Transport and replaces Smarter Travel (2009). The overall aim of the Policy is to "set out a strategic framework for 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade".

The Policy is a direct response to the fact that continued growth in demand for road transport is not sustainable due to the resulting adverse impacts of increasing congestion levels, localised air pollution, contribution to global warming and the additional negative impacts to health through promoting increasingly sedentary lifestyles. The following 3 key Policy areas and 10 goals form the basis of the National Sustainable Mobility Policy:

Safe and Green Mobility:

- Improve mobility safety.
- Decarbonise public transport.
- Expand availability of sustainable mobility in metropolitan areas.
- Expand availability of sustainable mobility in regional and rural areas.
- Encourage people to choose sustainable mobility over the private car.

People Focuses Mobility

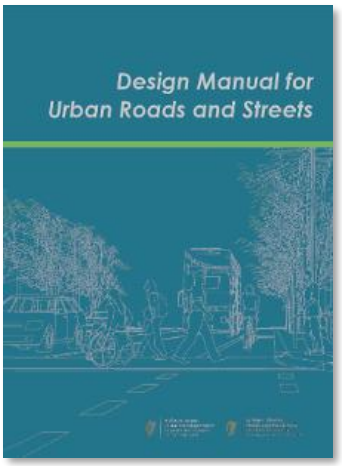
- Take a whole journey approach to mobility, promoting inclusive access for all.
- Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.
- Promote sustainable mobility through research and citizen engagement.

Better Integrated Mobility

- Better integrate land use and transport planning at all levels.
- Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.

The Sustainable Mobility Policy is accompanied by Action Plans that include actions organised by goals. The first Action Plan covered the period from 2022 to 2025; the current Action Plan 2026-2030(published in March 2026) sets out actions to take place between 2026 and 2030. Each action has been assigned to a specific government department or body and a deadline with the hope of creating accountability for their implementation.

3.4 DESIGN MANUAL FOR URBAN ROADS AND STREETS (2019)



The Design Manual for Urban Roads and Streets (DMURS) guidance document was produced by the Department of Transport, Tourism and Sports and the Department of Environment, Community and Local Government in March 2013 and updated in May 2019. It provides guidance relating to the design of urban roads and streets. It presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes regarding street networks and individual streets.

The manual places a significant emphasis on car dominance in Ireland and the implications this has had regarding the pedestrian and cycle environment. The document encourages more sustainable travel patterns and safer streets by proposing a hierarchy for user priorities. This hierarchy places pedestrians at the top, indicating that walking is the most sustainable form of transport and that by prioritizing pedestrians first, the number of short car journeys can be reduced, and public transport made more accessible.

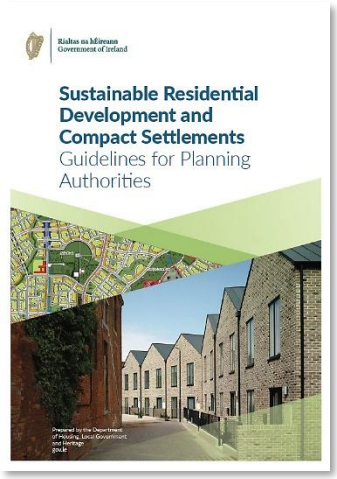
Second in the hierarchy are cyclists with public transport third in the hierarchy and private motor vehicles at the bottom. By placing private vehicles at the bottom of the hierarchy, the document indicates that there should be a balance on street networks and cars should no longer take priority over the needs of other users.

The manual emphasizes that narrow carriageways are one of the most effective design measures that calm traffic. The Standard width of an arterial and link street is between 5.5m and 6m.

Desirable footpath widths are between 2m – 4m. The 2m width should be implemented to allow for low to moderate pedestrian activity. A 3m – 4m footpath should be implemented to allow for moderate to high pedestrian activity.

The focus of the manual is to create a place – based sustainable street network that balances the pedestrian and vehicle movements. The manual references the different types of street networks, including arterial streets, link streets, local streets, and highlights the importance of movement.

3.5 SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENTS



The 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (SRDCSG), published in January 2024, set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Planning and Development Act 2000 (as amended) in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

The guidelines emphasise controlling the quantum of car parking as a key tool for producing modal shift and require that planning authorities adopt a tiered approach to car parking provision, based on the level of public transport available at the proposed development's location.

SPPR 3 – Car Parking of guideline states the car parking requirements as follows:

- *"In **city centres and urban neighbourhoods** of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these*

locations, where such provision is justified to the satisfaction of the planning authority, shall be ***1 no. space per dwelling****.*

- *In* ***accessible locations****, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be* ***1.5 no. spaces per dwelling****.*
- *In* ***intermediate and peripheral locations****, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be* ***2 no. spaces per dwelling****."*

SPPR 3 (Car Parking) also mentions that there *"should be a requirement to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards include the provision for visitor parking."*

The Guidelines also recognise the benefits that cycling brings to mobility, providing a flexible, efficient, and attractive transport option for urban living. The Guidelines require that this transport mode be fully integrated into the design of all new residential scheme. Access to secure storage of bicycles is a key concern for residents in more compact housing developments.

The Guidelines set the following requirements for cycle parking and storage are recommended, as per SPPR 4 (i) and SPPR 4 (ii) which are as follows:

- *"****Quantity*** *– in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of* ***1 cycle storage space per bedroom*** *should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- ***Design*** *– cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so*

that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided."

3.6 PLANNING DESIGN STANDARDS FOR APARTMENTS (JULY 2025)

The Design Standards for Apartments, Guidelines for Planning Authorities were published in July 2025, and set national planning policy and guidance in relation to the planning and development of apartment schemes to take account of current Government policy and economic, social and environmental considerations. It is noted that the Planning Design Standards for Apartments (July 2025) may be replaced by a future National Planning Statement (NPS).

The Design Standards for Apartments, Guidelines for Planning Authorities builds upon the recommendations of the Revised NPF by providing guidelines to support improved viability in the construction sector, a safeguarding of apartment standards and an overall increase in the delivery of apartments to address the growing need to supply a greater range of housing typologies. They also repeat the requirements in the Sustainable Residential Development and Compact Settlements Guidelines to provide cycle parking and consider the proposed development's location to determine the appropriate amount of car parking.

3.7 GREATER DUBLIN AREA TRANSPORT STRATEGY

The Greater Dublin Area Transport Strategy (2022-2042) (GDATS) was published by the National Transport Authority (NTA) in 2022 and sets out a framework for investment in development of transport infrastructure and services across the GDA out to 2042. This publication supersedes the previous *Transport Strategy for the Greater Dublin Area 2016-2035*.

GDATS arose from the 6-year review of the previous strategy in 2022, and as such draws substantially from its predecessor, while also aiming for consistency with the spatial planning policies and objectives set out in other key policy documents published in the interim. These include:

- The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) published in 2019
- The National Planning Framework published in 2018 *(revised in April 2025)*
- The National Development Plan published in 2018 *(superseded in July 2025 by the new NDP 2026 – 2035)*

GDATS 2022-2042 sets out four key strategy objectives which underpin the delivery of the overall Transport Strategy. These are as follows:

Strategy Objective	Description
An Enhanced Natural and Built Environment	To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, increasing walking, cycling and public transport use, and reducing car dependency.
Connected Communities and Better Quality of Life	To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.
A Strong Sustainable Economy	To support sustainable economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods.
An Inclusive Transport System	To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society.

Table 3-1: Key Strategy Objectives of the Greater Dublin Area Transport Strategy 2022-2042

3.8 DUBLIN CITY DEVELOPMENT PLAN 2022-2028

3.8.1 Transportation Policies, Objectives and Actions

The *Dublin City Development Plan 2022-2028 (DCDP)*, which came into effect on the 14th of December 2022, sets out the strategic approach and vision for the future development of Dublin City with a view to supporting the needs of residents, workers and visitors, improving the quality of life for all. Compared to its predecessor, the current *DCDP 2022-2028* incorporates several changes which are noteworthy, including aligning with and incorporating the following key policy publications:

- *The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA)* published in 2019
- The National Planning Framework (published in 2018 and revised in April 2025)
- *The National Development Plan 2021-2030* (published in 2018 *and superseded* in July 2025 by the *NDP 2026 – 2035*)

The current plan presents a number of transportation policies which are relevant to the subject development site and subject application. **Table 3-2** below summarises the most relevant policies, objections and actions as they relate to the subject development site.

Table 3-2 Dublin City Development Plan 2022-2028: Relevant Policies, Objectives and Actions

Sustainable Mobility	
SMT1	**Modal Shift and Compact Growth:** To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.
SMT2	**Decarbonising Transport:** To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure
SMT01	**Transition to More Sustainable Travel Modes:** To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle)
Effective Integration of Land use and Transportation	
SMT3	**Integrated Transport Network :** To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region.
SMT4	**Integration of Public Transport Services and Development:** To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.
Mobility Management and Travel Planning	
SMT6	**Mobility Management and Travel Planning:** To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.
SMT7	**Travel Plans for New and Existing Developments:** To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.
Public Realm, Placemaking and Healthy Streets	
SMT9	**Public Realm in New Developments:** To encourage and facilitate the co-ordinated delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.
Accessibility for All	
SMT11	**Pedestrian Network:** To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.
SMT02	**Improving the Pedestrian Network:** To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.
City Centre and Urban Villages- Access and Functional Needs:	
SMT13	**Urban Villages and the 15-Minute City:** To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.
Servicing	

SMT15	**'Last-Mile' Delivery:** To seek to achieve a significant reduction in the number of motorised delivery vehicles in the City through supporting and promoting the use of the 'last-mile' delivery through the development of micro hubs and distribution centres.
Active Travel Walking and Cycling:	
SMT16	**Walking, Cycling and Active Travel:** To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.
SMT17	**Active Travel Initiatives:** To promote and help develop community-based coordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes, and to target underrepresented cohorts/groups in such initiatives
SMT18	**The Pedestrian Environment:** To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.
SMTO8	**Cycling Infrastructure and Routes:** To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GI02.
SMT09	**Greater Dublin Area Cycle Network Plan:** To support the development of a connected cycling network in the City through the implementation of the NTA's Greater Dublin Area Cycle Network Plan, subject to environmental assessment and route feasibility.
Active Travel –Childcare Facilities, Schools and Third Level Institutions.	
SMT20	**Walking and Cycling for School Trips:** (a) To prioritise and target a significant increase in the number of children walking and cycling to and from schools; (b) To promote walking and cycling for school trips to all educational facilities; c) To promote and support initiatives such as "Safe Routes to School", the 'Green Schools' and 'Schools Streets' projects, and to prioritise school routes for permeability projects and provision and enhancements of pedestrian and cycle ways
Public Transport	
SMT22	**Key Sustainable Transport Projects:** To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes.
SMT017	**Additional Interchanges and Rail Stations:** To promote and seek provision of additional stations as part of the DART+ projects in consultation with Iarnród Éireann/Irish Rail.
SMT018	**Bus Infrastructure:** DCC will work with the NTA to incorporate bus infrastructure within new largescale developments where appropriate
Micromobility and Shared Mobility	
SMT24	**Shared Mobility and Adaptive Infrastructure:** To promote the use and expansion of shared mobility to all areas of the city and facilitate adaptive infrastructure for the changing modal transport environment, including other micro-mobility and shared mobility
SMT022	***Shared Bike Schemes and Micro-Mobility Schemes:*** To monitor the success of and expand the shared bike schemes and to facilitate the expansion of shared micro-mobility schemes throughout the city, in accordance with ongoing review and new models of operation such as the use of mobility hubs.
Car Parking	

SMT 27	***Car Parking in Residential and Mixed Use Developments:*** (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking. (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. (iii) To safeguard the residential parking component in mixed-use developments.
Traffic Management and Road Safety Impacts	
SMT 34	**Street and Road Design:** To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated

3.8.2 DCC Development Plan: City Edge

The DCC Development Plan specifically considers the subject Royal Liver site and adjoining lands within Objective CS02 which states:

> ***Local Statutory Plan for lands at Kylemore Road/Naas Road and Ballymount (City Edge)***
> *In accordance with the objectives of the City Edge Project, to prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term.*

In addition to being located in the area encompassed by the proposed City Edge Project, the framework for which was published following the adoption of the DCC Development Plan, the subject site is zoned as one of 17 Strategic Development and Regeneration Areas (SDRA) in the development plan. Section 13.7 specifically considers the area designated "SDRA 5 – Naas Road" which includes the subject Royal Liver site. The plan states:

> *The Naas Road SDRA sets out guiding principles for lands within the current Naas Road LAP and part of the future City Edge project. The guiding principles are in place to support development in the area pending the finalisation of the City Edge Project and Statutory Plan for the area. The SDRA contains six remaining key re-development sites, namely:*
>
> - *Royal Liver Retail Park*
> - *Motor Distributors Ltd site (Volkswagen factory)*
> - *Nissan plant site*
> - *Bluebell Avenue*
> - *Former Bluebell Road Regeneration Area*
> - *Naas Road Industrial Estate and surrounding lands*

Linking the re-development of these sites into the wider surrounding environment, and creating sustainable successful communities is central to the successful regeneration of this SDRA.

The DCC Development Plan identifies "*Guiding Principles"* for each of these 6 Key Opportunity Sites that constitute "SDRA 5 – Naas Road". In regard to the Royal Liver site the plan gives the following guidance.

1 – Royal Liver

- *To encourage the sustainable redevelopment of this key site as part of the mixed-use core of the Key Urban Village containing office and residential uses with local scale retail and service uses. To provide for a boulevard leading to a pocket park and pedestrian and cycling connections through the site to increase connectivity and deliver the green infrastructure network.*
- *To provide for a sustainable approach to height within the site, with buildings addressing the Naas Road and Kylemore Road providing a strong building line with appropriate heights, marked at the corner with a landmark building of up to 17 storeys. Within the site, heights will be at sustainable level, appropriate to the uses proposed.*
- *Require setbacks to be agreed with Dublin City Council along the main road frontages at Naas Road, along the east side of Kylemore Road to facilitate upgrading of the road to provide for a bus lane, segregated cycleway, greening of the route and footpaths allowing for an attractive and vibrant street environment and to encourage pedestrian and cyclist activity.*

The first and third guiding principle have very much influenced the scheme design and associated mobility strategy of the Phase 1 redevelopment proposals.

3.8.3 Development Principles

In summary the subject site and proposals are subject to the following DCC Development Plan objectives, standards and development principles:

- Site is zoned as a ***Strategic Development & Regeneration Area*** (SDRA 5)
- Site and immediate environs identified as a ***Key Urban Village*** (KUV)
- Advocates the principles and delivery of the ***15-minute city*** (Objective SMT13)
- Royal Liver site located within the lands covered by the emerging **City Edge** project (CS014)
- Site located within Parking Zone 2 (Map J).
    - Default **maximum** car parking standard of 1 space per dwelling



Figure 3-1: Parking Zone Map(left), Key Urban Village (Middle), Land Use Map (Right)

3.9 CITY EDGE PROJECT

3.9.1 Development Framework

Following the adoption of the Dublin City Development Plan and further detailed analysis of the area and a public consultation exercise, the Elected Members of South Dublin County Council and Dublin City Council adopted the City Edge Strategic Framework in June 2022. This non-statutory Framework sets out a high-level approach and transformational trajectory for the regeneration of a new liveable, sustainable and climate resilient urban quarter in the designated City Edge area that spans the functional areas of both South Dublin County Council and Dublin City Council. The framework establishes:

- The context for the preparation of a forthcoming statutory plan,
- Sets out high-level strategies for the regeneration of City Edge, including an overarching vision and strategic objectives
- Proposes the delivery of strategic infrastructure including streets, parks, public transport and utilities,
- Outlines a series of priority actions in the areas of legislation, policy, funding and infrastructure to facilitate the future development of City Edge

In the context of the subject Royal Liver Retail Park Redevelopment proposals the City Edge framework,

- Advocates the principles of the ***15-minute city.***
- Identifies the Naas Road District to be the ***Primary Town Centre*** in City Edge.

- Recognizes new transport hubs for Naas Rd / Kylemore Rd node (LUAS / Core Bus Corridor / Orbital) and Kylemore Railway Station (DART / LUAS / Orbital)
- Identifies the Kylemore Rd as an ***Inner Orbital Route*** (IOR) for PT
- Kylemore Rd is also identified as a ***"major high street"*** with pedestrian and bicycle focused street hierarchy
- Both Naas Rd and Kylemore Rd identified as ***Major Arterial Streets***
- Advocates 'Low car / car free' Centres strongly influenced by "*Decide and Provide*" vision based parking ratios including "car-free" residential development in appropriate areas.
- Such low car / car free centres (0-0.3 / unit) supported by access to car clubs, quality bike parking, bike sharing schemes etc.

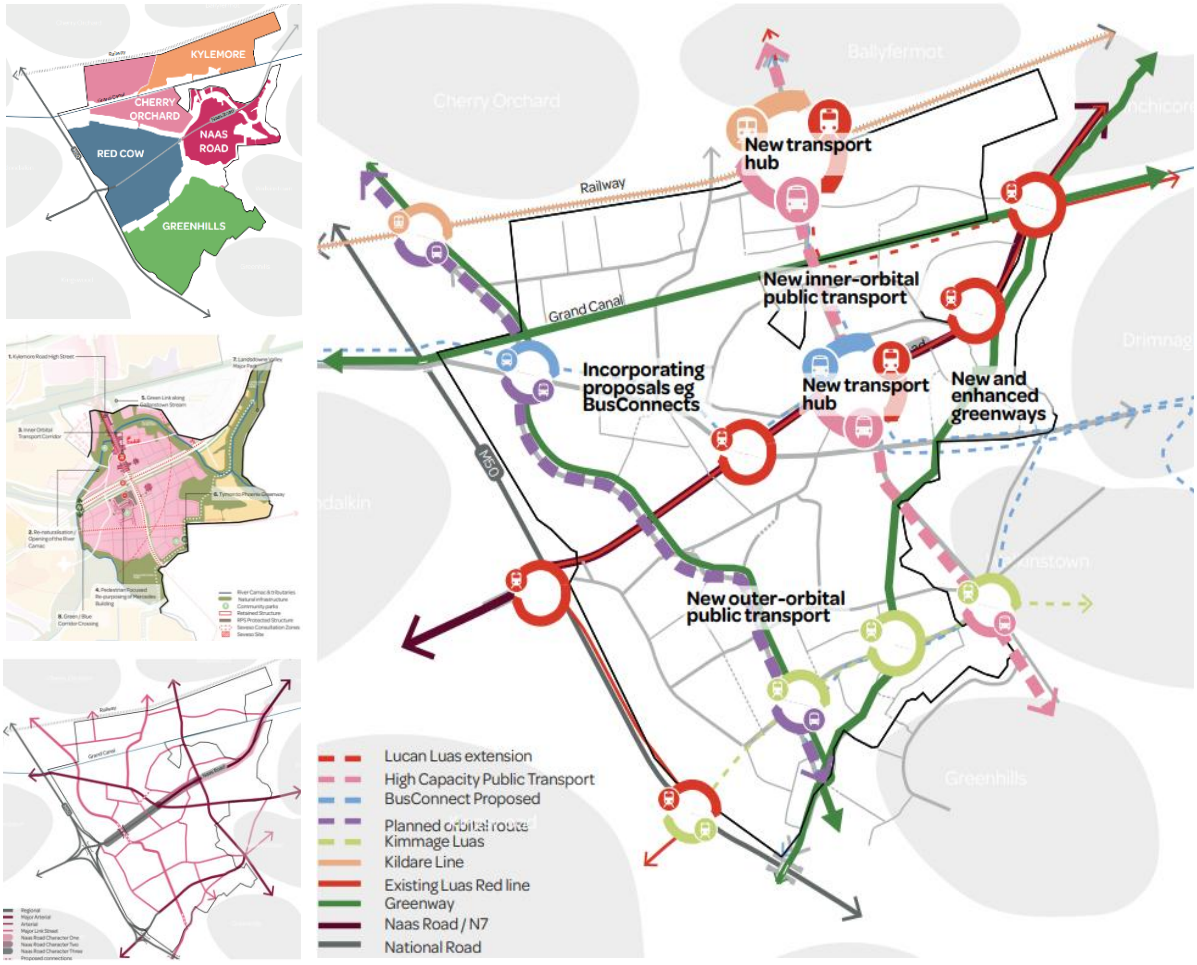


Figure 3-2: City Edge Project – Access and Movement Strategy

3.9.2 Modal Share Target for City Edge

Figure 151 in the City Edge Strategy (June 2022) illustrates the anticipated modal share for journeys to and from City Edge in the morning peak period (7-10am) with the assumption that wider city and national policies and programmes to encourage active and sustainable mobility have been implemented. The active travel modes will account for 56% of overall trips, reflecting a strong shift towards walking and cycling. Walking and bus travel account for the largest shares, each representing 37% each of all trips, highlighting both the compact, walkable nature of the area and the importance of high-quality public transport provision. Cycling comprises 19%, reflecting the potential of dedicated cycle infrastructure and growing uptake of active travel. Private car use is limited to just 7%, indicating a shift away from car dependency.

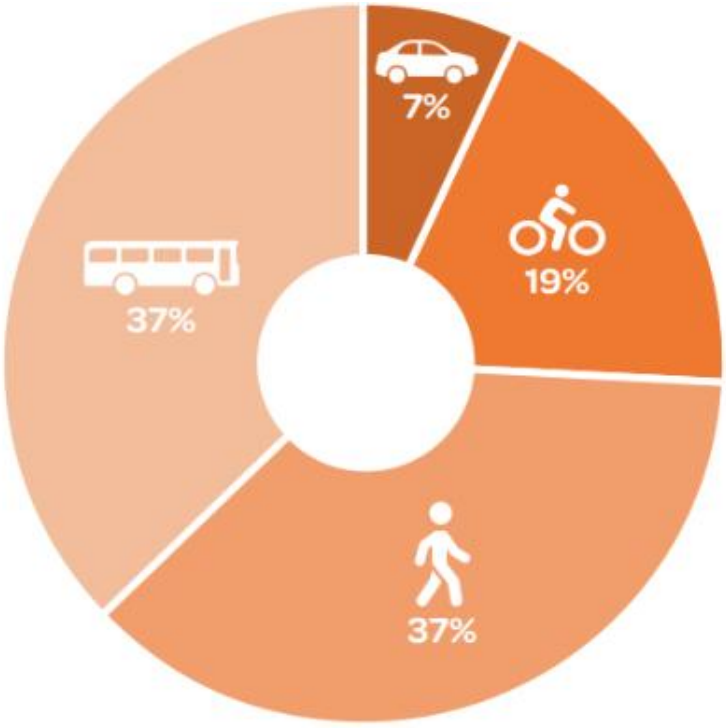


Figure 3-3 Proposed modal share for morning trips to and from City Edge.

3.9.3 City Edge High-Level Framework of Parking

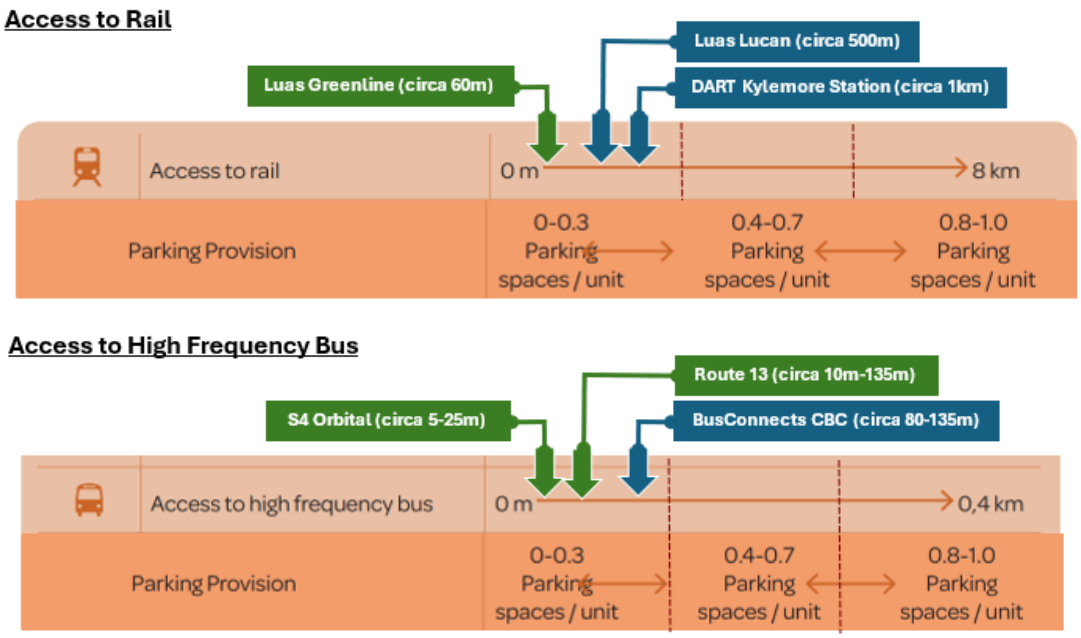
The high-level framework for parking within the City Edge Strategic Framework, sets out an approach that inform the appropriate provision of car parking in response to a given development sites accessibility to a range of services. The framework seeks to support the long-term vision of a low-car, transport orientated district. The framework applies best practice maximum parking standards, with provision tailored to the level of accessibility by public transport and proximity to essential daily services (e.g. 15 Minute City concept). Developments in highly accessible locations

with strong public transport connectivity and services are subject to zero or low parking standards, whereas areas with lower levels of accessibility may allow for higher levels of car parking provision.

This accessibility based approach ensures flexibility in the short to medium term while embedding sustainable travel patterns and facilitating the transition towards an overall car-free environment as infrastructure and services mature across the wider City Edge area with the ultimate aim of delivering the modal share vision for City Edge introduced above. In reference to the high-level framework evaluation criteria, the maximum parking provision at the development site should be in the range of 0 to 0.3 car parking spaces per residential unit, even in the current transition period before further City Edge amenities and services are delivered. This calculation is based on existing:

- Access to rail.
- Access to high frequency bus.
- Access to retail & community.
- Access to education

In the following assessment exercise, the existing facilities/services are indicated in **GREEN** and the City Edge planned facilities/services are indicated in **BLUE** in **Figure 3-4**. The following excludes the proposed primary and post primary schools identified for the Naas Road district as the specific location is unknown at this time (but ultimately are likely to be 300-600m from the subject site e.g. within the defined district).



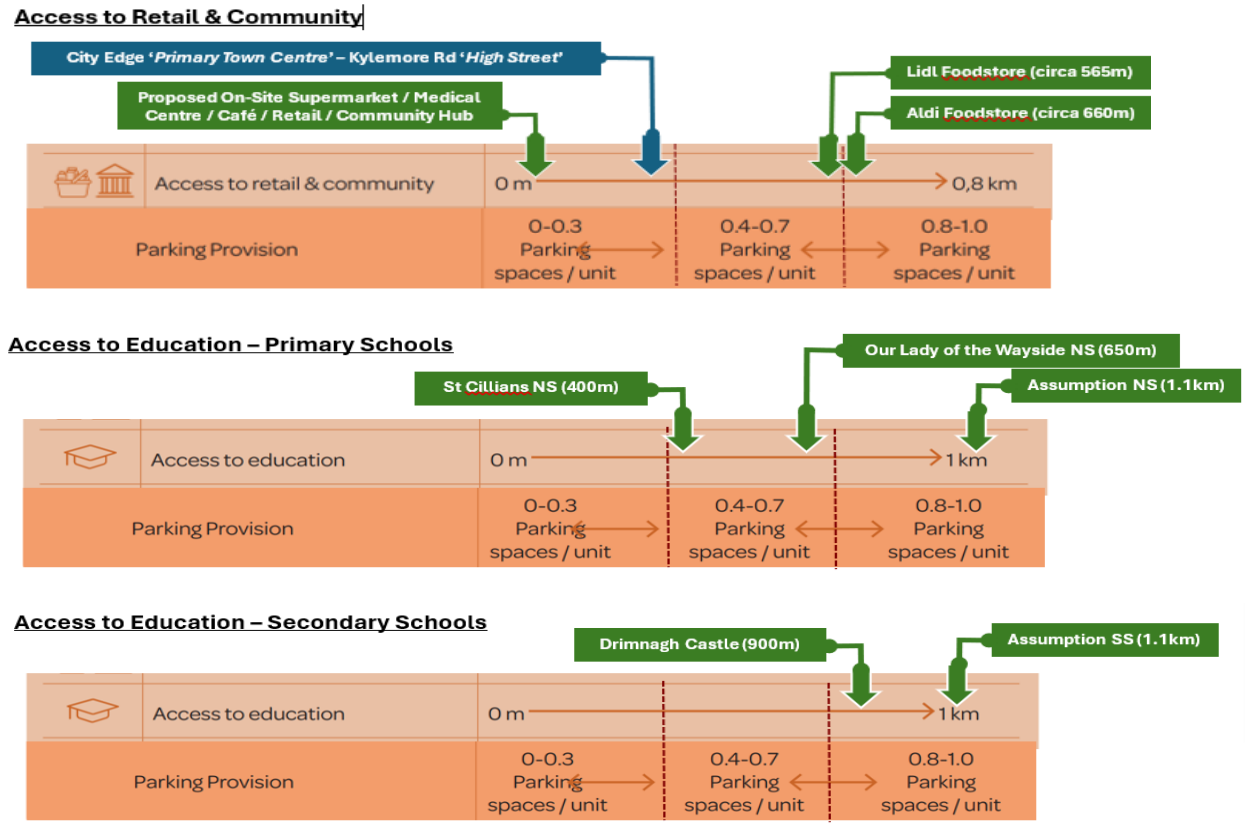


Figure 3-4: City Edge High Level Residential Parking Framework

Responding to the excellent accessibility credentials of the Royal Liver site the above analysis reveals that the application of a residential car parking ratio of 0.66 per dwelling unit is appropriate for the subject Phase 2 amendment to the Royal Liver development.

3.10 APPLICATION OF PLANNING AND DESIGN GUIDELINES

In summary, national and local planning policy, as well as design guidelines and the planning framework for City Edge, have set the following transportation principles and associated redevelopment attributes that are applicable to the subject Royal Liver redevelopment proposals:

- The site is classified as a ***City – Urban Neighbourhood*** location
- In terms of **Accessibility** the site is classified as a ***High Capacity Public Transport Node or Interchange*** being within 1 km of one of the following;
  - LUAS Redline (existing Kylemore Interchange circa 60 metres walk), or
  - BusConnects Core Bus Corridor, and emerging
  - LUAS Lucan and Kylemore Dart+ Railway Station

- In such locations the Compact Guidelines state that the design approach to the provision of on-site residents car parking is that:

  "Car parking should be minimised, substantially reduced or wholly eliminated".

3.11 PERMITTED SCHEME & PLANNING CONDITIONS

The optioneering and design of the Phase 2 scheme proposals has very much been influenced by both (i) the planning conditions applied to the 2023 Amendment grant of permission (Planning Ref. 4436/23) and the recently permitted Phase 1 proposals (5050/26) on the adjoining lands. The planning conditions for the 2023 application included

Condition 5(a)

> *"Works to the public roads surrounding the site, subject to agreement under Condition 6 reg. ref. 4238/19, shall be implemented prior to the occupation of any blocks within the development unless otherwise agreed in writing with the planning authority. All works shall be provided at the applicant/developer's expense."*

Condition 6 of the earlier permission (Planning Ref. 4238/19), states;

> *"Prior to the commencement of development, the developer shall consult with the planning authority and submit for the written agreement, details of any alternations to the public roads surrounding the site including road layout, traffic markings, pedestrian crossings and cycle path provision."*

These on-street amendments form part of the phase 1 2026 application. Whilst the specific extent and details are to be agreed with the planning authority as part of the compliance process (DCC Condition No. 5a) of the permitted 2023 application the works will also be subject to conditions imposed by DCC as part of the recently permitted Phase 1 Amendment Application. These off-site amendments along Kylemore Road and at the Naas Rd / Kylemore Rd junction, as proposed as part of phase 1 application are presented in **Figure 3-5** below (reference Phase 1 application documentation DBFL drawing PRL-DBFL-ZZ-ZZ-DR-C-1100).

As with the permitted 2019 and 2023 schemes, the Phase 1 building setbacks along Kylemore Rd corridor take account of City Edge' Projects *High Quality Public Transport Corridor* along Kylemore Road. Accordingly the extent of building setbacks (and position of footpaths and cycle tracks along the eastern side of Kylemore Rd) have specifically been designed to safe guard the future

implementation of both (i) the emerging NTA CBC works (ref. section 2.5.5) and (ii) in the longer term dedicated northbound and southbound bus lanes (in addition to northbound segregated cycle tracks) along the entire western site frontage with Kylemore Road and through the Naas Rd / Kylemore Rd junction.

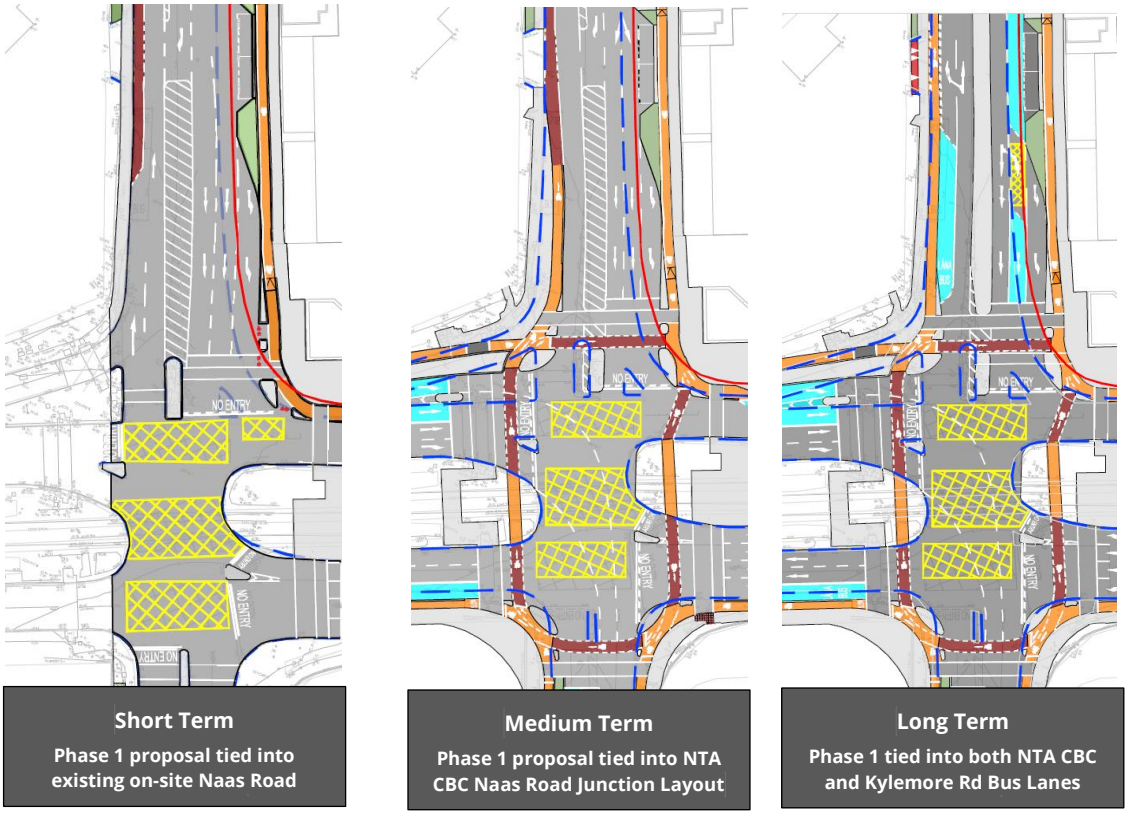


Figure 3-5: Naas Rd Junction Design Influenced by NTA CBC Layout and City Edge Objectives

It is acknowledged that DCC / NTA will implement the CBC infrastructure works along Kylemore Road sometime in the future at a date yet to be established. Acknowledging the scope of the CBC works and constraints such as access to a notable number of different private landholdings the delivery of Kylemore Road CBC has been categorised into potential short, medium and long term general arrangements layouts. DBFL have presented the phased delivery of the external road work including the future CBC scheme in drawing PRL-DBFL-ZZ-ZZ-DR-C-1100 (as entitled SHORT, MEDIUM & LONG-TERM GENERAL ARRANGEMENT – KYLEMORE RD). This drawing illustrates the delivery of the NTA's BusConnects CBC work at the Naas Road/Kylemore Road junction as located adjoining the Royal Liver Retail Park in the Medium term eg: the subject development will be constructed before the NTAs BusConnects CBC works are delivered.

In the **short term** prior to the implementation of the BusConnects CBC infrastructure but following the construction of the proposed development on the Royal Liver Retail Park it is important to establish the layout of the local road network to ensure all travel requirements are

being accommodated in a safe and appropriate manner. Accordingly, the proposed short-term layout has been developed on the basis of the local road layout that will exist immediately following the completion of Phase 1 of the Royal Liver Retail Park redevelopment. Whilst this short-term layout does not include the Kylemore Road dedicated bus lane infrastructure, it does include a number of new initiatives with the objective of mitigating the impact of the proposed development, in addition to safeguarding the opportunity for the bus lane infrastructure to be constructed at a later stage whilst ensuring tie in with the NTA's Bus Connects CBC works.

In the **medium-term scenario**, the NTA's Bus Connects CBC infrastructure is implemented by NTA at the Naas Road/ Kylemore Road junction. In the **long term**, the Phase 1 scheme safeguards the opportunity as per DCC aspirations to incorporate a high-capacity corridor along Kylemore Road, enhancing public transport provision and supporting future growth along the corridor.



Figure 3-6: Short, Medium and Long-Term Arrangement for Kylemore Road.

In addition , the design of the subject amendment development has had regard to the 2023 permitted schemes **Condition 5(b) which states that**

b) 703 no. car parking spaces shall be provided within the development site, of these the following allocations within the four car parks are applicable unless otherwise agreed in writing within the planning authority:

a) 545 no. car parking spaces shall be allocated to residential use including 177 no. spaces within the western podium car park, 90 no. spaces within the basement under Block B, and 278 no. spaces within the basement under Blocks C and D.

b) 15 no. car parking spaces shall be allocated to car share including 6 no. car parking spaces within western podium car park, 3 no. spaces within basement Block B car park, and 6 no. spaces with eastern podium car park.

c) 16 no. spaces shall be allocated to residential visitor car parking and servicing, maintenance, drop-off.

d) 63 no. car parking spaces within the eastern compound car park at Block C and D and 8 no. spaces within western podium car park shall be allocated to non-office commercial retail, medical, crèche and community uses.

e) 56 no. within basement Block B car park shall be allocated to commercial office use on the completion of Block A....”

The car parking proposal for the subject 2026 Phase 2 Amendment proposal has been aligned with the above condition 5(b) requirement as further discussion is set out in Section 4.4 of this report. These Phase 2 Amendment proposals also acknowledge and subsequently respond where appropriate to the planning conditions applied to the recently permitted Phase 1 Amendment (DCC Planning Ref. 5050/26) scheme including Condition 6 which states the following;

6. The following Transportation requirements of the Planning Authority shall be complied with:

(a) Prior to the commencement of development, the developer shall submit details of all alterations and works to the public roads surrounding the site including revised road layout, traffic markings, pedestrian crossings and cycle path provision and any other works required for the written agreement of the Planning Authority.

(b) Materials in public areas shall be in accordance with the document Construction Standards for Roads and Street Works in Dublin City Council.

(c) All works shall be completed prior to the occupation of the development and shall be carried out at the expense of the applicant/developer.

(d) Prior to commencement of development, the applicant/developer shall submit revised drawings for the written agreement of the Planning Authority for the following:

i. A revised site layout plan showing the relevant sections of footpath along Old Naas Road, Kylemore Road and Naas Road Place with a minimum width of 2.0m in all areas.

ii. A swept path analysis demonstrating access/egress of delivery vehicles/waste delivery trucks into the set downloading bays/waste collection area provided on the Northern Access A junction."

3.12 DEVELOPMENT MANAGEMENT STANDARDS

3.12.1 Car Parking Quantum

In considering the relevant car parking provision, DBFL has considered Appendix 5 of the Dublin City Development Plan 2022-2028 (Volume 2) and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024), as published by the Department of Housing, Local Government and Heritage.

As per DCC's Parking Zones defined in Existing and Future Strategic Transport and Parking area(Map J), the subject site is located within Parking Zone 2 which refers to parking alongside key public transport corridors. The subject site is located within an area that is classified as a "*City – Urban Neighbourhood*" with accessibility characteristics best described as a "*high capacity public transport node or Interchange*" as outlined in Table 3.8 of the Sustainable and Compact Settlements Guidelines.

In such locations the guidelines (SPPR 3) detail the default policy is for car parking provision to be "***minimised, substantially reduced or wholly eliminated***". With regard to the proposed Phase 2 development, the associated maximum car parking requirements are outlined in Table 3.3 below.

Land Use		Zone 2 DCC Standards (2022-28) (Maximum)	SRDCRG Standards (2024)
Residential	Apartment	1 per dwelling	*"minimised, substantially reduced or wholly eliminated"* Maximum, if justified, 1 per unit
	Visitor Parking	None detailed [B]	An allowance for visitor parking spaces but no standard defined. Maximum on-site permitted includes residents AND visitor parking provision

Non Residential	Retail Supermarkets	1 space per 100 sq. m. GFA	N/A
	Restaurant / Café / Bar	1 space per 150sq. m. seating area	N/A
	Creche	1 per 100 sq. m. GFA	N/A
	Community Uses [A]	1 per 275 sq. m. GFA	N/A
	Office	1 per 200 sq. m. GFA	N/A
Supplementary Notes;			
A – Community facilities that only serve residents of the proposed development.			
B – The DCC Development Plan (2022-2028) does not currently state any specific standards for residential visitor parking however recent SHD practices have generally required that 10% of all on-site car parking is safeguarded for visitors. .			

Table 3-3: Car Parking Standards

3.12.2 Disabled Car Parking

In reference to section 4.2 of Volume 2 of the DCC Development Plan (2022-2028) "*At least 5% of the total number of spaces shall be designated carparking spaces, with a minimum provision of at least one such space, which ever one is the greatest.*"

3.12.3 EV Car Parking

Section 5.0 of Volume 2 of the DCC Development Plan (2022-2028) states that "*a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging.*"

3.12.4 Visitor Car Parking

No specific allowance is detailed with the development management standards in regard to a specific quantum of visitor parking that should be provided.

3.12.5 Motorcycle Parking

In reference to section 5.0 of Volume 2 of the DCC Development Plan (2022-2028) "*New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided*."

3.12.6 Bicycle parking

In order to determine an appropriate level of cycle parking provision for the proposed mixed-use development, reference is made to both the Dublin City Development Plan 2022-2028 requirements, and the Sustainable Residential Development and Compact Settlements Guidelines. The cycle parking standards from both standards are detailed in Table 3-4 below.

Land Use		DCC Standards (2022-28) (All Zones)		SRDCSG Standards (2024)		DCC Requirements (2022-28) (All Zones)	
		Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay
Residential	Apartment	1 space per bedroom	1 per two apartments	1 space per bedroom	*"Visitor cycle parking should also be provided"*	1004	318 (635 Apartments)
Non-Residential	Retail	1 per 5 staff	1 per 100 sq. m. GFA	N/A	N/A	2 (7 to 10 staff)	8 (834 sqm)
	Restaurant / Café	1 per 5 staff	1 per 10 seats	N/A	N/A	3 (17 staff)	15 (150 seats)
	Creche	1 per 5 staff	1 per 10 children	N/A	N/A	4 (21 staff)	12 (123 children)
	Community Uses [A]	N/A	-	N/A	N/A	N/A	
Sub Total						**1013**	**353**
Total for Phase 2 Development						**1366**	

Table 3-4: Bicycle Parking Standards for Phase 2

4 PROPOSED PHASE 2 DEVELOPMENT AMENDMENT

4.1 PROPOSED AMENDMENT TO PHASE 2 (2026)

The proposed 2026 amendment to phase 2 application will hereafter referred as 'Phase 2 application'. The development will consist of amendments to a previously permitted mixed-use development (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804, as amended by DCC Ref.: 4436/23 and DCC Reg. Ref.: 5050/26). The proposed amendments relate solely to the permitted Blocks B1, B2, C1, C2, D1 & D2 (identified as Phase 2). No amendments are proposed to any other permitted blocks. The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 & D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted), which includes 38 No. Studios, 269 No. 1-Bed, 288 No. 2-Bed- 4-Person and 40 No. 3-Bed- 5-Person, units as follows:

- Alteration of Block B1 from a permitted 11-12-storey building providing for 90 no. apartment units to a 10-storey building providing for 107 no. apartments.
- Alteration of Block B2 from a permitted 10 storey building providing for 90 no. apartment units to a 10-storey building providing for 89 no. apartments.
- Alteration of Block C1 from a permitted 10-storey building providing for 171 no. apartment units to a 10-storey building providing for 144 no. apartments.
- Alteration of Block C2 from a permitted 10-storey building providing for 89 no. apartment units to a 10-storey building providing for 98 no. apartments.
- Alteration of Block D1 from a permitted 9-storey building providing for 87 no. apartment units to a 9-storey building providing for 123 no. apartments.
- Alteration of Block D2 from a permitted 8-storey building providing for 106 no. apartment units to an 8-storey building providing for 74 no. apartments.

The reconfiguration of internal layouts of each of the blocks has resulted in the minor shift in the block footprints. The permitted podium between Block B2 and Block C1 is removed with additional public realm and connection to the south proposed. The block amendments result in amendments to permitted communal amenity space with the removal of roof terraces on Blocks C1, C2 and D1 and amendment to roof terraces on Block B1 and B2.

Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc. and a revised approach to the Naas Rd frontage.

Alteration of the permitted uses and facade at ground floor level and removal of permitted BTR tenant amenity spaces located in Blocks B1, B2, C1 & C2 to provide for a ground floor level that includes:

- Blocks B1-B2: 1 no. retail/café/restaurant unit, 1 no. café unit, 1 no. community unit, a creche (relocated from Block D1) and associated cycle parking, plant areas and entrances.
- Block C1-C2-D1-D2: 1 no. retail unit, 2 no. retail/cafe/restaurant units, own door residential units, undercroft parking and associated cycle parking, plant areas and entrances.

Alterations to the permitted undercroft and basement parking areas under Blocks B1, B2, C1, C2, D1 & D2 to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations.

Amendment of Condition 3 (a) of the parent permission (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) relating to the Build to Rent (BTR) covenant, and its removal as it relates to Blocks B1, B2, C1, C2 & D1.

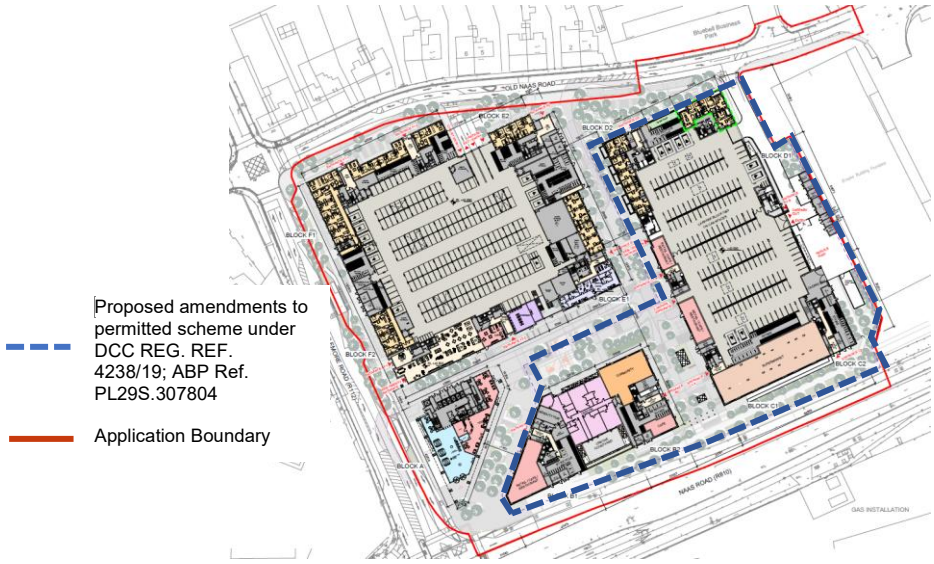


Figure 4-1: Site masterplan with Phase 2 Boundary and Blocks Annotated. (Source: Henry J Lyons.

The proposed development schedule for the Phase 2 element of the masterplan for both the permitted (2023) and proposed (2026) schemes, is summarised in **Table 1-1** below.

	Unit Type	Permitted (2023 Scheme)		Proposed (2026 Scheme)	
		Apartments	Area (sqm)	Apartments	Area (sqm)
Residential	Block B1	90	-	107	-
	Block B2	90	-	89	-
	Block C1	171	-	144	-
	Block C2	89	-	98	-
	Block D1	87	-	123	-
	Block D2	106	-	74	-
Non-Residential	Restaurant / Café	-	467	-	596
	Retail Super Market	-	2360	-	834
	Creche	-	462	-	600
	Community Use		269		351

Table 4-1: Development Schedule Comparison for Phase 2

4.2 SITE ACCESS ARRANGEMENTS

4.2.1 Operational Access Strategy

No changes to the site access arrangements are proposed as part of the subject Phase 2 amendment application. The entire master plan development site will continue to be accessible for vehicles via the two previously permitted access/egress points on Old Naas Road. The site access arrangement with respect to the overall masterplan context is illustrated in **Figure 4-2.**

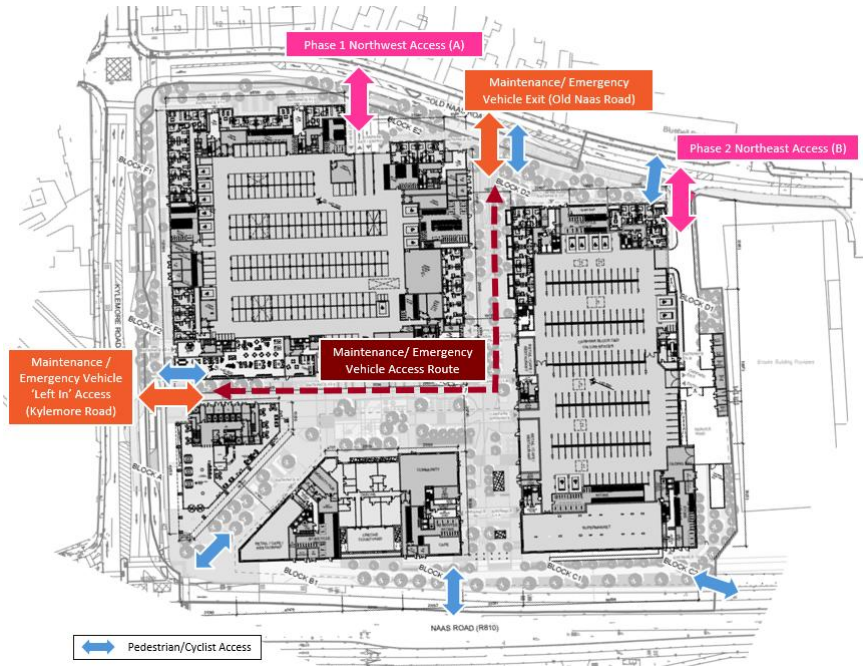


Figure 4-2: Masterplan Site Vehicle Access Arrangement.

The two number 'all moves' three arm priority junctions are located on Old Naas Road with the northwestern (A) vehicular access allowing residents and visitors to gain entry to / from Phase 1 (sub-podium) level car park. The northeastern vehicular access (B) allows entry to / from the Phase 2 non-residential car park (as located at podium level) as well as the entrance to the basement car parking facilities for residents of the phase 2 development via internal ramps. This vehicle access is also intended for use by service vehicles and the retail unit delivery vehicles, with a dedicated retail loading yard located adjoining the southeastern boundary of the site.

Also, a left in access (entry only) is provided on Kylemore Road with corresponding exit only access point on the Old Naas Road for maintenance vehicle traffic (at permitted times only) and emergency vehicles as per the previously permitted scheme. Both the access and exit for the maintenance / emergency vehicles will be actively managed with access restricted (e.g. rising bollard controls or similar) to permitted vehicles only.

The site will be accessible to pedestrians via access points from the Old Naas Road, the Kylemore Road (R112) and from the Naas Road (R810). The buildings blocks at ground floor level will benefit from a number of block specific pedestrian entry points as presented in **Figure 4-3** below.

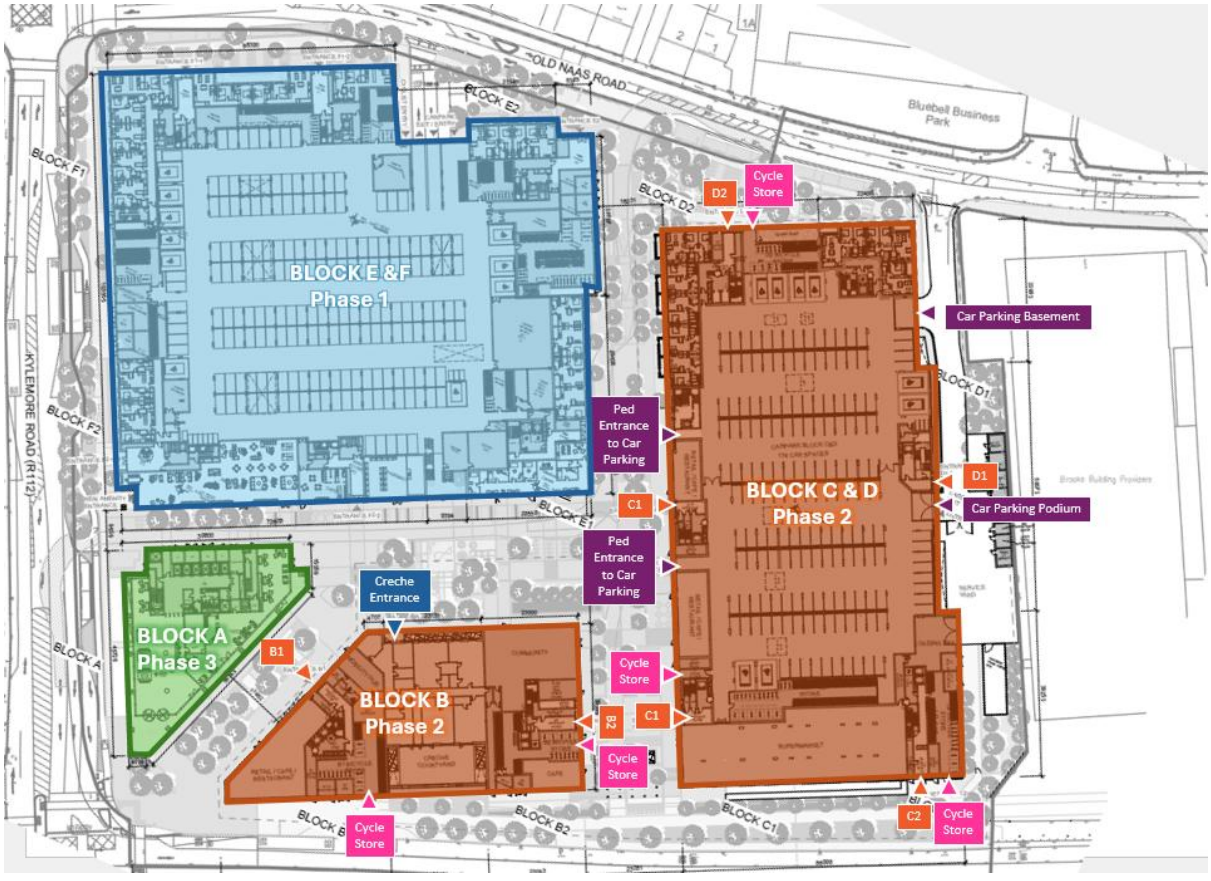


Figure 4-3 Phase 2 Blocks B, C, and D Ground Floor Plan Residential Entry Points Proposed.

4.2.2 Servicing Strategy

The access and management arrangements for delivery, collection and service vehicles is detailed in the accompanying DBFL report entitled *Delivery and Servicing Plan*. All delivery and service traffic including waste collection vehicles will utilise the masterplans northeastern vehicular access (B) junction on Old Naas Road.

4.3 PARKING

4.3.1 Car Parking

The subject Phase 2 amendment proposals incorporate a total of 514 no. parking spaces for the proposed 635 apartments and commercial units. This proposed provision comprises 510 no. spaces internally (335 no. at basement level and 175 no. at under croft / podium level), and 4 no. external spaces situated along the north-eastern boundary on the southern side of Old Naas Road.

A total of 419 car parking spaces have been provided for the residential element of the Phase 2 development, equating to a residential car parking ratio of 0.66 spaces per residential unit. Further details of the Phase 2 developments car parking provision and associated management measures are detailed in Chapter 5.

4.3.2 Bicycle Parking

As detailed further in Section 5.4 the proposed Phase 2 development proposals include the delivery of 1,104 bicycle parking spaces on-site incorporating;

- 1016 secure and weather protected long term bicycle parking spaces within dedicated internal bike stores for residents and staff, in addition to
- 88 number short term spaces externally at ground level for visitors (for Phase 2 and Phase 3).

4.4 MASTERPLAN PHASING

The proposed development phasing, as illustrated in applications accompanying HJL drawing PRL-HJL-ZZ-ZZ-DR-A-0050A, is presented in **Figure 4-4** below. The combined Phase 1, Phase 2 and Phase 3 developments are hereafter collectively referred to as the "Masterplan".

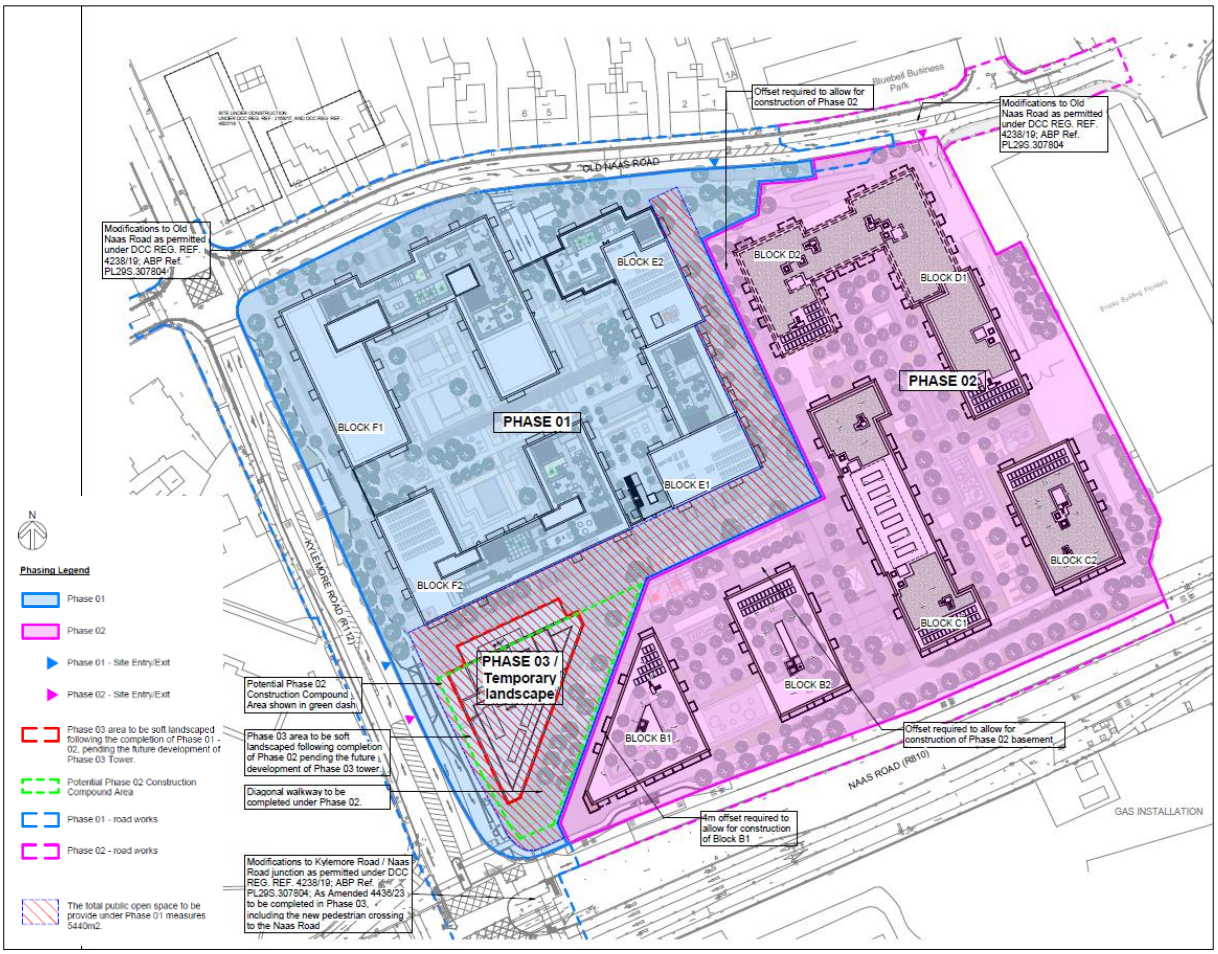


Figure 4-4: Masterplan Phasing Plan

5 PARKING MANAGEMENT STRATEGY

5.1 INTRODUCTION

A key component in the effective operation of onsite car parking is an active and enforced parking management strategy. This strategy will be managed by the management company who will be responsible for the control of the parking and access arrangements as well as the allocation of the parking spaces. The proposed development's on-site car parking spaces will remain within the control of the appointed management company. A management regime will be implemented by the development's management company to control access to these on-site apartment car parking bays thereby actively managing the availability of on-site car parking for each of the following user profiles;

- Residents of the proposed development,
- Staff based at the proposed development (Retail, Office, café, crèche etc), and
- Visitors to the site (friends, family, deliveries, taxi etc.).

5.2 CAR PARKING

5.2.1 CAR PARKING QUANTIUM

The subject Phase 2 amendment proposals incorporate a total of 514 no. parking spaces for the proposed 635 apartments and commercial units. This proposed provision comprises 510 no. spaces internally (335 no. at basement level and 175 no. at under croft / podium level), and 4 no. external spaces situated along the north-eastern boundary on the southern side of Old Naas Road. A total of 419 car parking spaces have been provided for the residents of the Phase 2 development, equating to a residential car parking ratio of 0.65 spaces per residential unit. The residential spaces are provided in the following locations;

- 335 No. residents car parking spaces in the Phase 2 basement car park,
- 84 No. residents parking spaces in Phase 2 podium / undercroft car park (Internal Zone 2)
- In addition to 7 no. visitor spaces in the podium / undercroft car park (Internal Zone 1)

It should also be noted that the Phase 2 car parking provision includes 56 no Phase 3 (Bock A) office parking spaces mirroring the quantum previously permitted as part of the 2023 planning application. These 56 no Phase 3 (Block A) car parking spaces are accommodated in the Phase 2 Podium car park. While these spaces will serve the Phase 3 office development, they will be

delivered as part of the Phase 2 works but managed / safeguard (no access permitted) in the interim period until the Phase 3 Block is delivered.

Unit Type		DCC Dev. Plan Parking Requirements (No. Units / Size Proposed)			2019 Permitted Car Parking Provision	2023 Permitted Car Parking Provision	2026 Proposed Car Parking Provision *(Overall Parking Ratio for Phase 1, Phase 2 - 0.497)*			
		2016-22 (2019 Scheme)	2022-28 (2023 Scheme)	2022-28 (2026 Scheme)			Phase 1	Phase 2		
								Basement	Podium	Total
Residential	Block E1, E2	469 (469 Units)	465 (465 Units)	563 (563 units)	247 (1: 0.52)	177 (1: 0.38)	177 (1:0.31)	-	-	-
	Block F1, F2									
	Block B1, B2	180 (180 Units)	180 (180 Units)	196 (196 Units)	-	90 (1: 0.50)	-	100	0	419 (1:0.66)
	Block C1, C2	260 (260 Units)	260 (260 Units)	242 (242 Units)	334	278 (1: 0.61)	-	235	84	
	Block D1, D2	193 (193 Units)	193 (193 Units)	197 (197 Units)						
	Visitor Parking	-	-	-	112	16	9	-	7	7
Commercial	Restaurant / Café / Bar	6 (847 m^2)	4 (553 m^2)	7 (972 m^2)	6	1	1	-	6	6
	Retail (Pharmacy – Block F2)	- (75 m^2)	- (119 m^2)	- (125 m^2)	1	0	0	-	-	-
	Medical Centre	16 (237 m^2)	12 (242 m^2)	12 (226 m^2)	16	6	6	-	-	-
	Community Uses	5	1 (269 m^2)	2 (340 m^2)	5	9	1	-	2	2
	Creche	3	5	6	3	5	0	-	7	7
	Retail (Supermarket)	25 (2,435 m^2)	24 (2,360 m^2	8 (834 m^2)	44	50	-	-	8	8
	Office	85 (17,002 m^2)	85 (17,002 m^2)	85 (17,002 m^2)	85	56	-	0	56 [C]	56 [C]
Car Share	Internal (On-Site)	-	-	-	9	15	6	0	5	5
	External (Old Naas Rd)	-	-	-	3	3	3	0		0
Drop-off / Collection Spaces	Internal (On-Site)	-	-	-	0	0	0	-	-	-
	External (Old Naas Rd)	-	-	-	3 [A]	3 (Old Naas Rd) [A]	3 (Old Naas Rd) [A]	0	-	-
	External (Kylemore Rd)	-	-	-	2	2	2	-	-	-
Courier Bays					0	-	2 (External Block EF)	1 (External Block CD)		1
External Public Car Parking Spaces (Old Naas Rd)		-	-	-	6	6 (Old Naas Rd)	3 (Old Naas Rd)	3 (Old Naas Rd)		3
Sub-Total (Internal)		**1242**	**1229**	**1318**	**862**	**703**	**200**	**335**	**175**	**510**
Sub-Total (External)		**-**	**-**	**-**	**14**	**14**	**13**	**4**		**4**
Total Car Parking		**1242**	**1229**	**1318**	**876**	**717**	**213**	**514**		**514**

Note C: As per permitted provision for Phase 3 Office Block

Table 5-1: Comparison of Overall Masterplans Permitted vs Proposed Car Parking Provision.

5.2.2 CAR PARKING ACCESS / EGRESS ROUTES

All cars access the Phase 2 development will use northeastern site access B (Ref. Figure 4-2) on Old Naas Road. Site Access B leads to an internal north-south aligned on-site access road that provides access to (i) vehicle access to basement car park, (ii) vehicle access to podium car park and (iii) dedicated secure service yard.

5.2.3 DISABLED CAR PARKING

A total of 25 no. disabled parking spaces is provided within the Phase 2 development, comprising 17 no. spaces in the basement and 8 no. spaces in the undercroft car parks. This provision is in accordance with the requirements of Appendix 5 of the Dublin City Development Plan 2022-2028, representing 5% of the total car parking provision. **Table 4-4** below details the quantum of disability-accessible car parking provided as part of Phase 2.

Minimum DCC Standard	Total Basement Parking	Disability-Accessible Parking	Total Undercroft Parking	Disability-Accessible Parking
5% of the total number	335 spaces	17 spaces	175 spaces	8 spaces

Table 5-2: Quantum of Disability - Accessible Car Parking Provision in Phase 2.

5.2.4 CAR PARKING ALLOCATION

The maximum car parking requirement set by the Dublin City Development Plan and the SRDCSGs in reference to the development of the Royal Liver site is illustrated in **Table 5-2.** The proposed 2026 amended Phase 2 strategy provides for:

- **Residents** – a total of 419 no. car parking provision for Phase 2 units resulting in a ratio of 0.66 spaces per unit.
- **Visitors** – A total of 7 no on-site spaces. Whilst no specific requirement (quantum) for visitor car parking is detailed in the 2022-2028 DCC Development Plan.
- **Car Share** – A total of 5 no. car share is proposed as part of the amended Phase 2 development. These car share vehicles are located in the Phase 2 the podium car parking
- **Non-Residential (Retail, Cafes, Creche, Community Uses)** – A total of 79 no car parking provision for non-residential are provided at podium level.
- **Courrier Bay**- A total of 1 No. Courrier bay is provided external near block C,D

The proposed basement car parking provision (335) for Phase 2 is illustrated in **Figure 5-1** and **Figure 5-2** below. The layout of the Phase 2 podium level car parkin (175 spaces) is presented in **Figure 5-4** below.

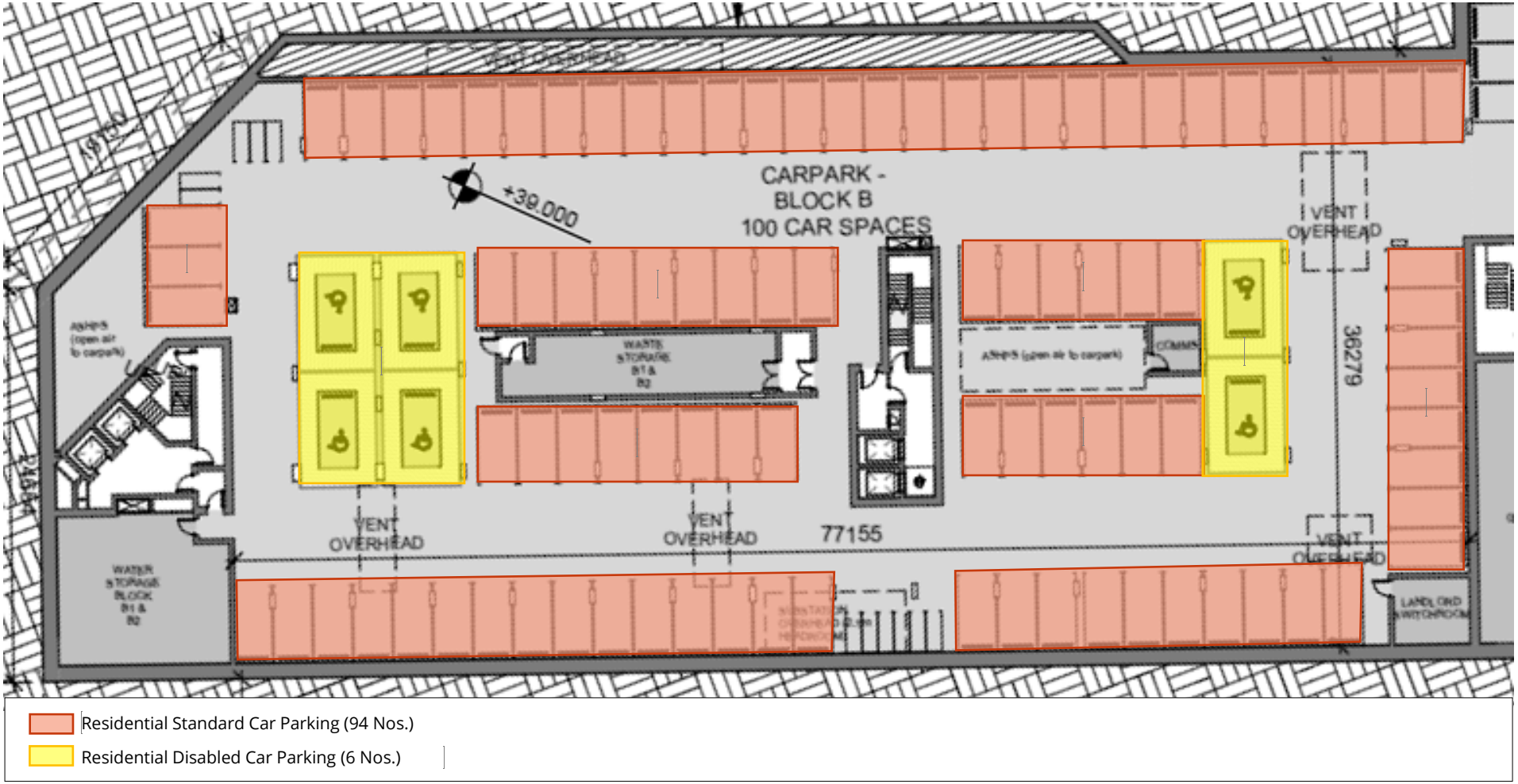


Figure 5-1: Phase 2 Block B Basement Car Parking (PRL-HJL-ZZ-B1-DR-A-0010A)



Figure 5-2: Phase 2 Block C & D Basement Car Parking (HJL Layout PRL-HJL-ZZ-B1-DR-A-0010A)



Figure 5-3: Phase 2 Basement Parking Access/Egress Controls (HJL LayoutPRL-HJL-00-00-DR-A-0011A-SITE LAYOUT PLAN - LEVEL 00)



Figure 5-4: Phase 2 Undercroft / Podium Car Park Allocation (HJL LayoutPRL-HJL-00-00-DR-A-0011A-SITE LAYOUT PLAN - LEVEL 00)

5.2.5 EV Car Parking

Appendix 5 of the Dublin City Development Plan 2022–2028 mandates that a minimum of 50% of all car parking spaces be provided with fully functioning EV charging points. In this regard, a total of 257 no. spaces will be equipped with EV charging infrastructure, in compliance with the stated requirement as illustrated in **Figure 5-5 to 5-7**. The location of the EV parking spaces in Undercroft is illustrated in The EV charging infrastructure and associated parking spaces will be maintained and managed by the Management Company, or by a suitably qualified contractor appointed by the Management Company, to ensure their ongoing operation, maintenance, and availability for residents and authorised user.

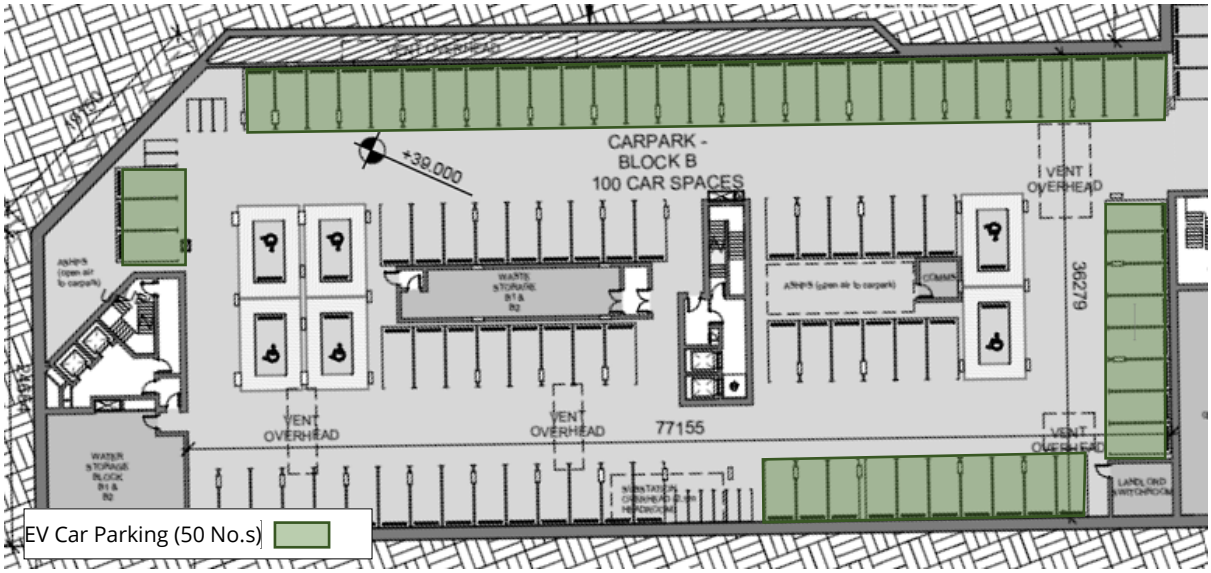


Figure 5-5:EV Car Parking Provision for Basement Parking (Block B)



Figure 5-6:EV Car Parking Provision for Basement Parking (Block C& D)

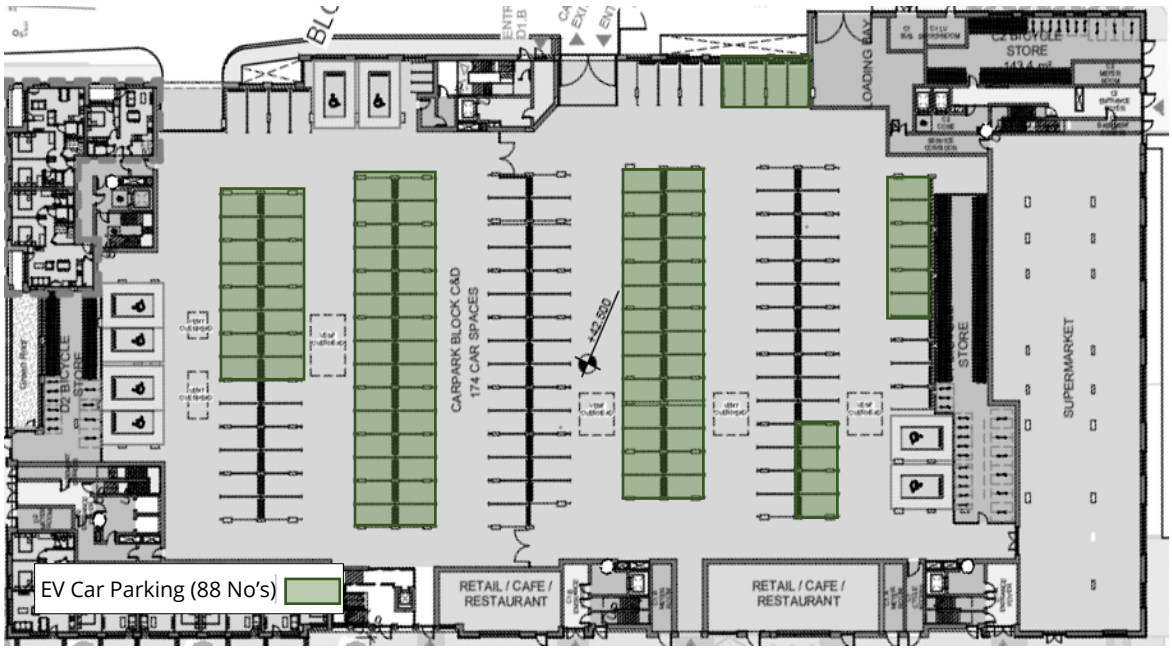


Figure 5-7: EV Car Parking Provision for Undercroft / Podium Car Park

5.2.6 CAR SHARE FACILITIES

The Phase 2 development proposals incorporate 5 no. dedicated car-share parking spaces located within internal zone 1 of the undercroft car park. These spaces shall be reserved exclusively for use by an approved car sharing operator and available for both residents, staff and general public.

The Management Company shall actively engage with the appointed car share provider (Enterprise) to ensure the availability of shared vehicles for residents. The inclusion of dedicated car sharing spaces forms an important component of the overall mobility strategy for the development. Car sharing offers residents/staff access to a private vehicle use without the need to own or maintain an individual vehicle. Numerous studies have demonstrated that each dedicated car-share vehicle can remove multiple privately-owned vehicles from the road network, thereby reducing parking demand, traffic generation and transport related emissions. The letter of support for the Car Share from Enterprise is attached along with the planning application.

5.2.7 CAR PARK ACCESS CONTROL

Vehicular access to the basement and undercroft / podium (Zone 2) car parking areas will be controlled through the implementation of physical barriers / gate controls. These barriers / gate controls seek to actively manage access / egress to the restricted parking areas with only permit holders (resident/staff key fob, automatic number plate recognition (ANPR) or equivalent) permitted access thereby ensuring that unauthorised vehicles cannot gain entry. Surface-level

parking areas will be managed in accordance with the Parking Management Plan prepared for the development.

5.2.8 COMMUNICATION PRIOR TO OCCUPATION

Upon occupation, all residents will be provided with a 'Welcome Pack' (MMP initiative) outlining site access arrangements, parking regulations, and sustainable travel information. Residents will be required to acknowledge and adhere to these parking and traffic management measures. Similar information will be provided to tenants occupying rental units.

5.2.9 PARKING MANAGEMENT AND ENFORCEMENT

Basement Car Park - Allocation

Parking provision within the basement car park facility will be restricted to residents of the Phase 2 residential units.

Undercroft / Podium Car Park - Allocation

The podium car park incorporates two internal control zones, namely **Zone 1** and **Zone 2** as presented in **Figure 5-3** and **Figure 5-4**. Whilst the general public will be permitted access to Internal Zone 1, only residents of Phase 2 and staff working in Block A (Phase 3) will have access to the car parking in Zone 2. Control barriers / gates will be implemented to manage access to/from Zone 2 car parking area at the two locations detailed in **Figure 5-3**.

Whilst the general public will be able to gain access to the podium car parks Zone 1 area, within which retail (8 No.), community (2 No.), Café/Restaurant (6 nos.), creche (7 No.), Car Share (5 No.) and Visitor (7 No.) Car Parking spaces are provided, a further 56 no 'Office' spaces are also located in the area but will not be accessible to the general public. These 56 no. 'Office' spaces are to be temporarily blocked off with physical barriers until such time that Block A (Office block) is constructed as part of the subsequent Phase 3. The implementation of the temporarily barriers restricting access to these ringfenced 56 no. 'office' car parking spaces seeks to ensure that neither the public or resident can utilise these specific car parking spaces in the interim period prior to the construction of Block A in Phase 3.

Car Parking Management Plan

Residents access to the on-site car parking will be facilitated through the application and control of Residents Car parking permits. All residents will be able to apply to the management company for a parking permit however only one car parking permit per residential apartment unit will be allowed on a first come basis. The permit will permit access to a specific car parking space for a defined period of time. A charge will be applied for each and every car parking permit to cover the

cost of the management system and encourage residents to utilise the range of sustainable travel options available at the Royal Liver site. Prior to occupation any perspective resident will be informed about the availability and cost of a car parking permit thereby influencing their decision to take up residence at the subject development.

Signage and road markings will be implemented to inform car park users of the intend use and management of each car parking space within the undercroft / podium car park. The majority of the non-residential car parking spaces (excluding the Car Share and Office spaces) located in the podium car parks Zone 1 area will be subject to a maximum parking duration e.g. 1 hr during the day and 3 hours during the evening / night.

Parking Enforcement

To maintain compliance with the Parking Management Plan and prevent unauthorised / inappropriate car parking practices, an enforcement regime will be implemented by the site management company. This may include vehicle clamping or other appropriate enforcement measures where necessary. The management company may utilise a specialist operator for this enforcement role. These arrangements seek to ensure that parking restrictions are adhered to and that parking spaces remain available for authorised users.

5.3 MOTORCYCLE PARKING

The Dublin City Development Plan 2022–2028 requires the provision of motorcycle parking spaces equivalent to 5% of the total number of car parking spaces. In accordance with this requirement, a total of 30 no. motorcycle parking spaces are provided as part of the proposed Phase 2 development which exceeds the 5% requirement. The motorcycle parking locations are illustrated in **Figure 5-8**.

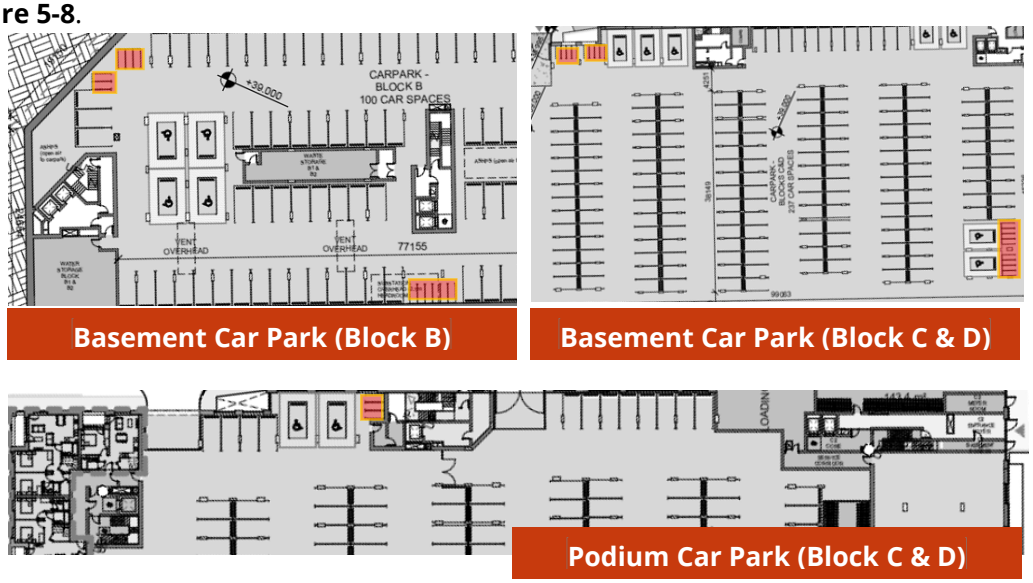


Figure 5-8 Phase 2 Motorcycle Parking Locations

5.4 BICYCLE PARKING

The Phase 2 development proposals include the provision of a total of 1104 on-site bicycle parking spaces. This level of provision includes both long term bike parking for residents and staff in addition to short term parking for visitors. The following table demonstrates the level of compliance between the proposed 1104 no. bicycle parking spaces and the corresponding cycle parking standards in the Dublin City Development Plan 2022-2028 and the SRDCSGs requirements.

Land Use		Units / GFA	DCC Dev Plan 2022-2028 Standards		SRDCSGs Standards		Proposed Cycle Parking	
			Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay
Residential	Apartments	1003 bedroom	1003	318 (635 Apartments)	1003	*Visitor Cycle Parking should also be provided'*	1004	88* (70+18)
Non-Residential	Retail (Supermarket)	843 sqm	2 (7 to 10 staff)	8	n/a	n/a	12	
	Community Use	351	n/a	n/a	n/a	n/a		
	Creche	123 children	4 (21 staff)	12	n/a	n/a		
	Retail/ Café/ Restaurant	150 seats	3 (17 staff)	15 (150 Seats)	n/a	n/a		
Sub Total Cycle Parking			**1012**	**353**	**1004**	**-**	**1016**	**88**
Total Cycle Parking			**1365**		**1004**		**1120**	

**these are 88 additional spaces provided above the 302 spaces provided as part of the Phase 1 proposal. The 88spaces provided will include for both phase 2 and phase 3. An addition of 10 extra spaces is also provided as part of LRD opinion.*

Table 5-3 :Phase 2 Bicycle Parking Requirements and Provision Comparison

5.4.1 Long Term Bicycle Parking

Secure, weather protected cycle parking is provided for residents and staff of the Phase 2 development. A total of 1016 No. long term cycle parking spaces are provided internally across 6 different bike stores at basement (1 store with 240 no. spaces) and podium level (5 stores with 776 spaces). The specific locations of these 6 no. long-term cycle parking stores is illustrated in **Figure 5-9** to **Figure 5-11** below.

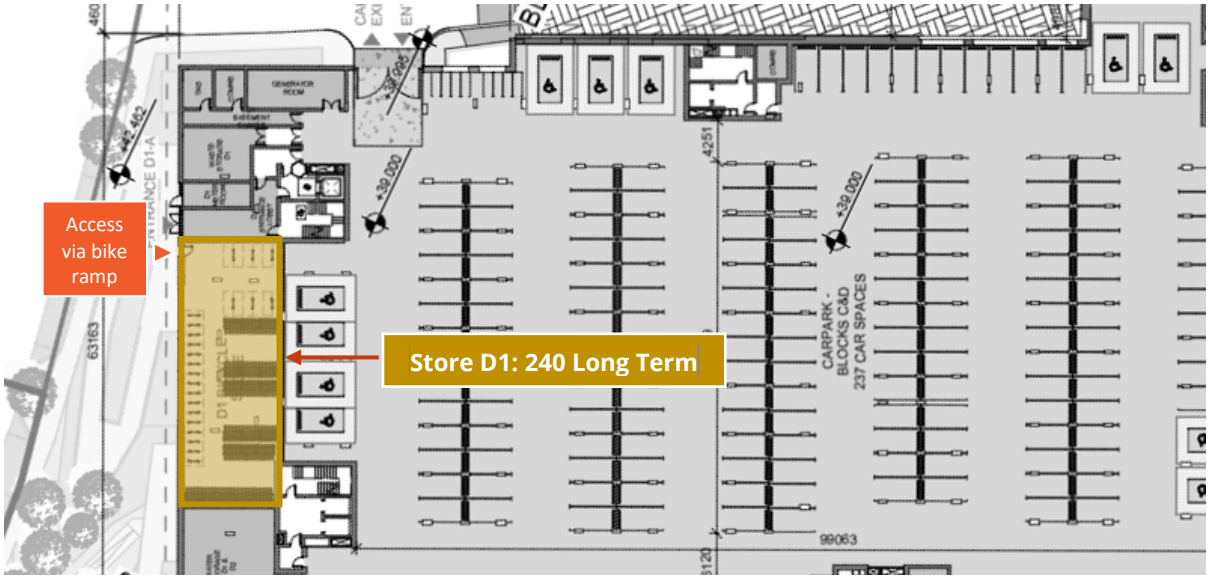


Figure 5-9: Long Term Cycle Parking in Phase 2 -Basement

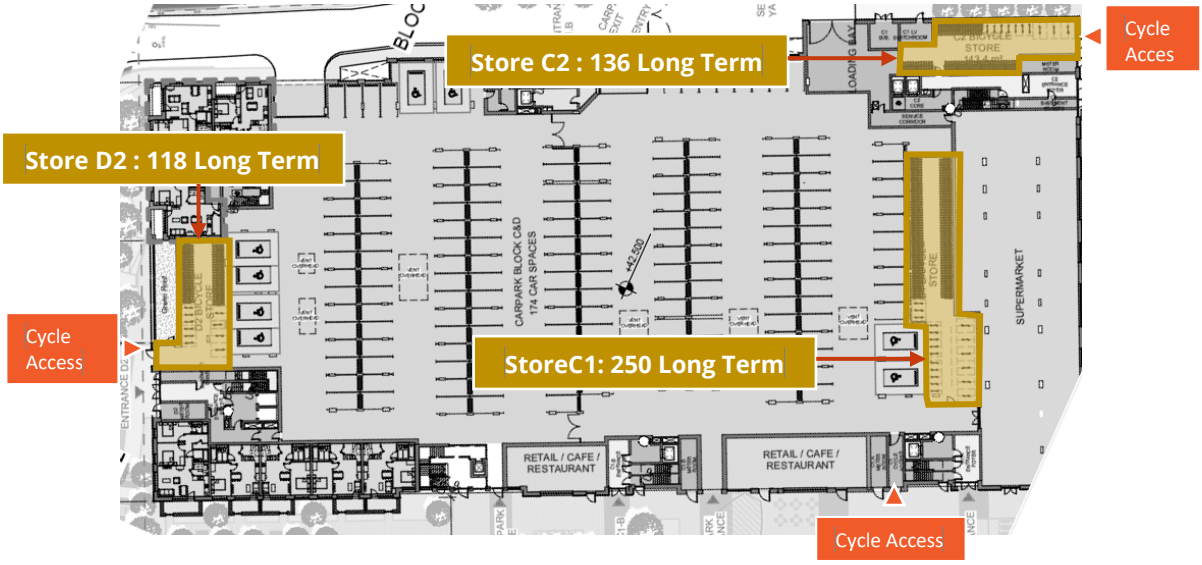


Figure 5-10: Long Term Cycle Parking in Block C,D -Ground Level

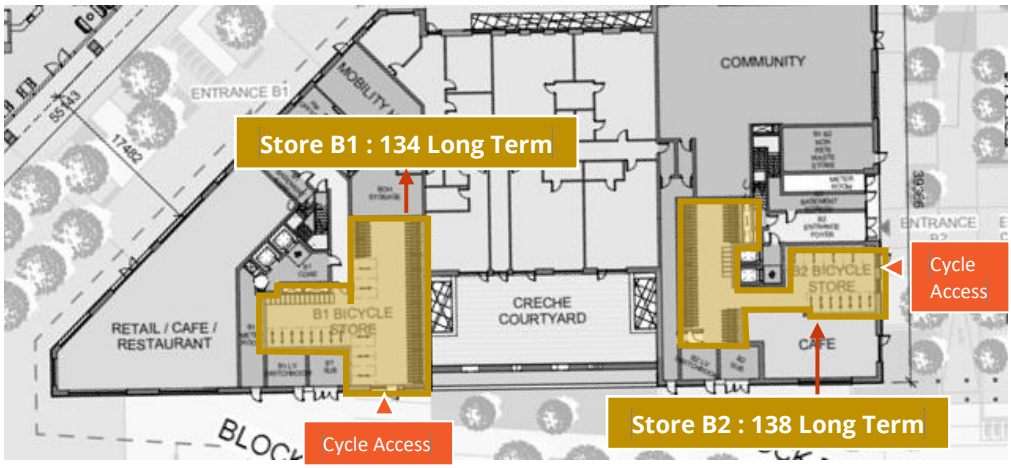


Figure 5-11: Long Term Cycle Parking in Block A -Ground Level

Phase 2 Bicycle Store	Two-tier Rack System	Sheffield Stand spaces	Cargo Bike	Sub-Total
B1	108	16	10	134
B2	116	14	8	138
C1	212	26	12	250
C2	116	14	6	136
D1	196	32	12	240
D2	98	14	6	118
Total	846	116	54	1016

Table 5-4: Proposed Phase 2 Long-Term Cycle Parking

The number and type of bicycle parking space within each of the 6 bike stores is summarised in Table 5-4 above.

Access to/from the 5 no. bike stores at podium level is provided either directly from the ground level plaza areas/streets/amenity areas, whilst the basement bike store is accessed via a dedicated bike friendly ramp up onto Old Naas Road.

5.4.2 Short Term Bicycle Parking

A total of 88 no. short term bicycle parking spaces is provided as part of the Phase 2 development. These 88 visitor cycle parking spaces are additional to and complement the permitted Phase 1 short term bicycle parking which provided 302 no. visitor bike parking spaces. Accordingly, the masterplan provides that a total of 390 short term bike spaces will be provided on-site comprising the permitted 302-no. Phase 1, 70 spaces with Phase 2 and 18 short term spaces with Phase 3 (but delivered as part of the Phase 2 works). This quantum of 390 visitor bike spaces whilst representing a substantial quantum of bike parking is acknowledged to be below the DCC Development standards for Bicycle. Nevertheless, it is noted that;

- the Compact Settlement Guidelines only requests a generic "*Visitor Space to be provided*" suggesting an allowance, such as the proposed 390 visitor bike spaces, opposed to a specific quantum identified.
- The permitted 2023 scheme (Planning Ref. 4436/23) provided only 264 visitor bike spaces for the entire masterplan representing only 43.5% of the corresponding DCC development management standard requirement. The proposals represents an increase above this accepted quantum with the new provision now equating to 53% of DCC requirements.

DBFL believe the provision of 390 dedicated short-term spaces distributed across the masterplan lands in convenient highly accessible locations represents an appropriate considered quantum for the following reasons;

- The demand greater than 390 is very unlikely to be generated at the same time.
- The allowance for dual usage between residential and non-residential demands being generated at different times of the day and days of the week.
- The excellent public transport levels available at the site including LUAS, CBC arterial bus services, the additional Kylemore Road orbital bus routes in addition to the proposed DART+ services via the new Kylemore Rd railway station; will make public transport the preferred sustainable travel choice for the vast majority of journeys were the travel distance greater than a convenient short walk is required.
- The proposed 390 visitor bike spaces represent a significant increase over the previously permitted 264 spaces in the earlier 2023 scheme proposal. Whilst the 2023 provision represented 44% of the DCC standard the subject 2026 masterplan proposals represent a larger proportion at 53% of the DCC standards.

As a result, we believe that the proposed 390 on-site visitor bicycle parking spaces can perform a dual use accommodating the bike parking requirements for both the non-residential (weekday daytime) and residential uses (typically weekday evenings and weekends). The **Table 5-5** below illustrates the overall cycle parking for the subject masterplan.

Development Phase	DCC 2022-2028 Dev Plan Requirements		Overall Master Plan Provision	
	Long Term	*Short Term*	*Long Term*	*Short Term*
Phase 1	871	291	871	302
Phase 2	1012	353	1016	70
Phase 3	227	85	227	18
Sub Total	**2110**	**729**	**2114**	**390**
Total	**2839**		**2504**	

Table 5-5: Royal Liver overall requirement and provision

In reference to **Figure 5-13** the proposed short term visitor bicycle parking is to be provided in 10 areas across the masterplan lands.

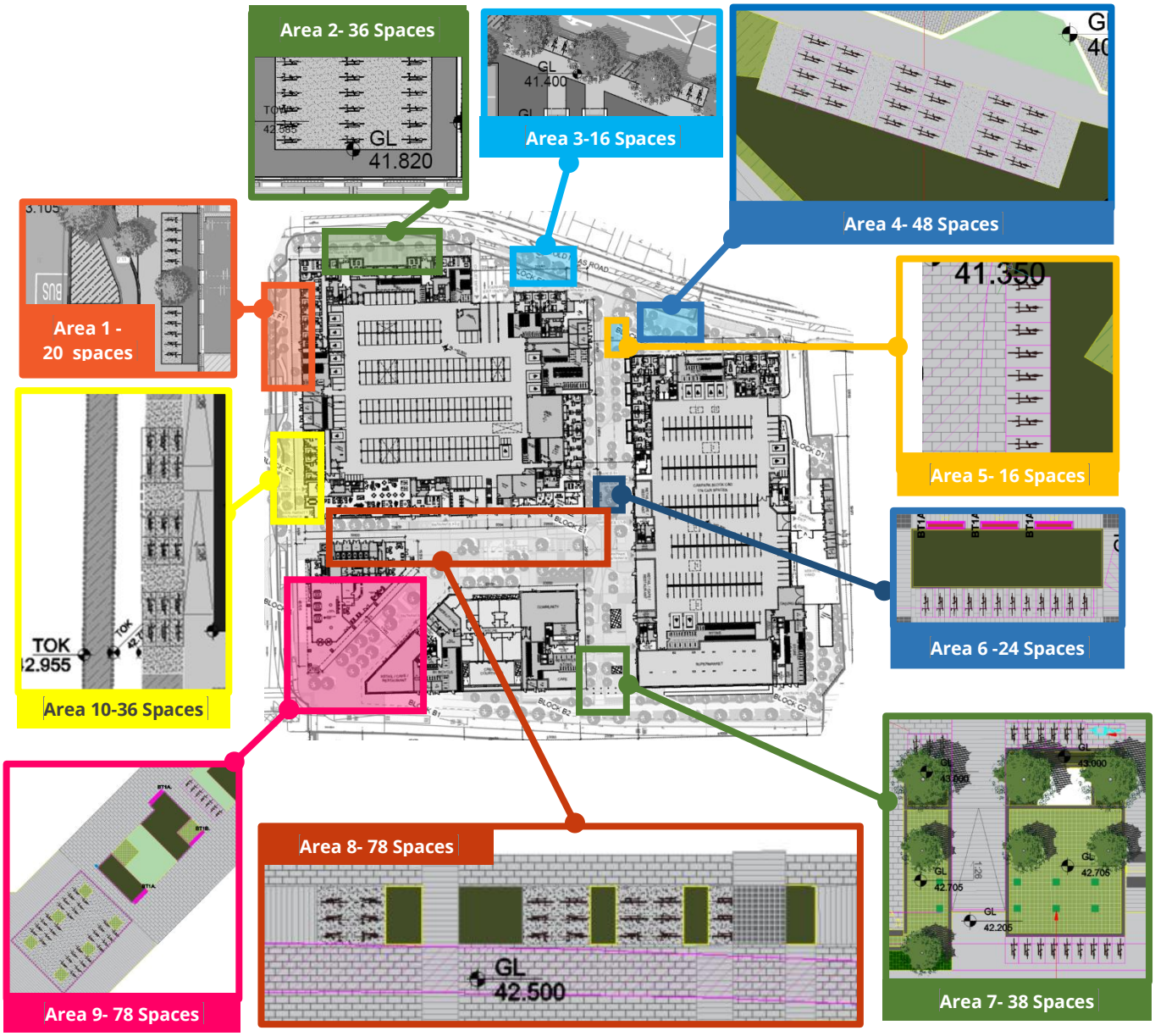


Figure 5-12: Masterplans Short Term Cycle Parking – Updated with new Phase 2 Increased Provision

6 TRAFFIC IMPACT

6.1 INTRODUCTION

The following section outlines the predicted traffic impact arising from the proposed 2026 Phase 2 amendment. the amended proposal increases the Phase 2 residential provision from 633 to 635 apartment units (with increase of parking ratio from 0.58 to 0.66), representing an additional 2 apartments. Furthermore, the retail floor area has been significantly reduced from 2,360 sq.m to 635 sq.m.

6.2 NETWORK DATA

To establish up to date baseline traffic movements, new traffic surveys have been commissioned and undertaken by IDASO on Thursday, 22 May 2025, at the following two key external junctions. At the time of the surveys the existing on-site retail buildings were no longer operational.

- Kylemore Road (R112) / Old Naas Road junction, and
- Naas Road (R810) / Kylemore Road (R112) / Walkinstown Avenue (R112) junction.

The results of the junction surveys identified that the weekday AM peak hour occurs between 08:00 - 09:00, whist the PM peak hour occurs between 15:45 - 16:45.

6.3 VEHICLE TRIP GENERATION COMPARISON

a comparison of the Phase 2 development's predicted vehicle trip generation between the permitted schemes and current proposal is detailed in **Table 6-1** below.

Scheme	LAND USE	Apartment Units / GFA	AM Peak Hour			PM Peak Hour		
			Arr	Dep	Two-Way	Arr	Dep	Two-Way
2019 Scheme	Phase 2 Apartments *(Parking Ratio 0.52)*	633	16	49	65	34	25	59
	Retail	2435	47	35	82	92	93	185
	Restaurant/Café	720	0	0	0	9	8	17
	Creche	462	15	10	25	7	8	15
	Total		***78***	***94***	***172***	***142***	***134***	***275***
2023 Scheme	Phase 2 Apartments *(Parking Ratio 0.58)*	633	18	55	73	38	28	66
	Retail	2360	46	34	79	89	90	179
	Restaurant/Café	467	0	0	0	6	5	11
	Creche	462	15	10	25	7	8	15
	Total		***78***	***98***	***177***	***140***	***131***	***270***

Scheme	LAND USE	Apartment Units / GFA	AM Peak Hour			PM Peak Hour		
			Arr	Dep	Two-Way	Arr	Dep	Two-Way
2026 Scheme	Phase 2 Apartments *(Parking Ratio 0.66)*	635	20	62	83	44	31	75
	Retail	834	16	12	28	31	32	63
	Restaurant/Café	596	0	0	0	7	7	14
	Creche (123 Students)	600	19	13	33	9	11	19
	Total		***56***	***88***	***143***	***91***	***81***	***172***

Table 6-1: Comparison of Phase 2 Vehicle Trip generation

6.4 COMMITTED DEVELOPMENT

The review of online planning portal revealed that the local receiving environment benefits from having a number of permitted developments which are not yet occupied/completed. As per good practice this assessment has imported these local 3rd party permitted schemes as 'Committed' developments with the objective of providing a robust appraisal of the local road network. As detailed in following section, a total of 5 separate 'Committed' development schemes of material size have been included within this assessment.

(Site to East- WEB5179/25, DCC 3792/23)

Five year permission has been granted to the proposed development comprising the amendments to a previously permitted mixed-use scheme (Reg. Ref. 3228/20, as amended by Reg. Ref. 3792/23), including a former Build-to-Rent (BTR) element. The modifications involve the rationalisation and repurposing of internal layouts within Blocks I, J, K, and L, resulting in an increase in total residential units from 395 to 416, alongside minor increases in gross floor area. The BTR designation of Block L is to be omitted to allow for all tenure types. Associated elevational changes include the replacement of curtain walling with traditional fenestration, provision of terraces and balconies, and adjustments to access openings. The proposal also includes a reconfiguration of surface car parking, resulting in a net increase of 9 resident spaces, the provision of 32 additional long-stay cycle parking spaces, and minor reductions in communal and public open space (which remain above required standards). **Table 6-2** below indicates the associated vehicle traffic generation for the committed development.

LAND USE	AM Peak Hour			PM Peak Hour		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Apartments (Block A,B)	264	321	585	256	242	498
Total Trips	**264**	**321**	**585**	**256**	**242**	**498**

Table 6-2:Committed Development trips from Nissan Site

Old Naas Cottages Committed Development (DCC Ref. 2158/17)

Planning permission was granted for 85 no. Residential apartment (DCC reg. Ref 2158/17) and subsequently amended in June 2019 (DCC reg 4637/18) to provide a total of 103 No. residential apartment units. **Table 6-3** below indicates the associated vehicle traffic generation for the committed development.

LAND USE	AM Peak Hour			PM Peak Hour		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Apartments	5	15	20	13	8	20
Total Trips	**5**	**15**	**20**	**13**	**8**	**20**

Table 6-3: Committed Development trips from Old Naas Cottages

Units 16-21A-B, Parkmore Industrial Estate, Longmile Road- SDCC LRD25A/0002W

Permission was granted to Large-scale Residential Development (LRD) comprises the demolition of existing commercial and industrial buildings on the site, with a total floor area of approximately 6,711 sq.m, and the construction of a mixed-use residential and commercial/employment development with a gross floor area of approximately 49,275 sq.m (excluding undercroft areas). The development consists of four blocks ranging in height from 6 to 10 storeys and will provide a total of 436 apartments. The scheme also includes a range of supporting facilities and services, comprising internal residential amenity spaces with a total floor area of approximately 375.3 sq.m, a community library (352.1 sq.m), a crèche (359.1 sq.m), and four commercial/employment units with a combined floor area of approximately 1,226.6 sq.m. These commercial uses include two office/co-working units (435.8 sq.m in total), a medical centre with ancillary pharmacy (674.1 sq.m), and a café (116.7 sq.m). Ancillary works include the provision of 173 car parking spaces within two undercroft car parks and 1,040 cycle parking spaces. **Table 6-4** below indicates the associated vehicle traffic generation for the committed development.

LAND USE	AM Peak Hour			PM Peak Hour		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Apartments	41	118	159	78	52	130
Total Trips	**41**	**118**	**159**	**78**	**52**	**130**

Table 6-4: Committed Development trips from Parkmore Industrial Estate

Royal Liver (DCC Ref. 4436/23, 5050/26, 4238/19; ABP Ref. PL29S.307804)

A 10-year permission was granted for the demolition of two existing single-storey warehouse buildings (c.12,800 sq.m GFA) and the development of a large-scale mixed-use scheme comprising

residential, office, crèche, community, retail, café/bar/restaurant, medical centre, and pharmacy uses across nine buildings ranging from 7 to 18 storeys over basement level. The original permission (4238/19; ABP Ref. PL29S.307804) provided for 1,102 residential units, 129,210 sq.m of gross floor area, 874 car parking spaces, 37 motorcycle spaces, and 1,896 bicycle spaces. Subsequent approved amendments (Reg. Ref. 4238/19; ABP Ref. PL29S.307804) revised the scheme to 128,736 sq.m GFA with 26,151 sq.m ancillary floorspace, reduced the residential provision to 1,098 apartments and car parking to 715 spaces, while increasing motorcycle parking to 39 spaces and bicycle parking to 2,318 spaces.

LAND USE	AM Peak Hour			PM Peak Hour		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Phase 1	57	68	124	119	109	228
Phase 3	127	137	265	198	192	389

Table 6-5: Committed Development trips from Royal Liver Site

Site at Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12 (2319/18,4244/15)

Permission was granted under Reg. Ref. 4244/15 and subsequently amended under Reg. Refs. 2438/17, 2875/17 and 3940/17. The approved amendments included: (i) the provision of an additional setback floor on Block A, increasing its height from 6 to 7 storeys and providing 55 residential units; (ii) a revised design and layout of Block B to provide 16 residential units; (iii) a revised design, layout and position of the western portion of Block C to provide 73 residential units; (iv) amendments to the elevations of Blocks A, B and C, including revised balconies and terraces; (v) a revised hard and soft landscaping masterplan; and (vi) associated site development works, infrastructure and services. Overall, the amendments resulted in an increase of 16 residential units across the development, comprising an increase of 6 units in Block A, 4 units in Block B and 6 units in Block C. The forecast development-generated trips associated with this committed development are presented in **Table 6-6** below.

LAND USE	AM Peak Hour			PM Peak Hour		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Development	11	74	85	39	14	53

Table 6-6: Committed Development trips from Royal Liver Site

6.5 PREDICTED NETWORK IMPACT

The predicted traffic impacts recorded at each of the four key local junctions, as generated as a result of proposed 2026 Phase 2 amendments during the AM Peak hour (08:00 - 09:00) and PM peak hour (15:45-16:45) are illustrated in **Table 6-7** and **Table 6-8** respectively.

Junction	Design Year	DM Traffic Flows	DS 2023 Scheme (633 Units)	DS 2026 Scheme (635 Units)	2023 Scheme Impact	2026 Scheme Impact	Net Difference in Impact
Old Naas Road / Proposed Development Western Site Access	**2030**	376	483	463	28.19%	22.86%	**-5.33%**
	2035	459	565	545	23.13%	18.75%	**-4.37%**
	2045	475	581	561	22.35%	18.12%	**-4.23%**
Old Naas Road / Proposed Development Eastern Site Access	**2030**	351	528	496	50.33%	40.81%	**-9.52%**
	2035	488	664	632	36.27%	29.41%	**-6.86%**
	2045	504	680	648	35.12%	28.48%	**-6.64%**
R112 Kylemore Road / Old Naas Road	**2030**	1703	1808	1789	6.17%	5.00%	**-1.17%**
	2035	1835	1940	1921	5.73%	4.64%	**-1.09%**
	2045	1915	2020	2001	5.49%	4.45%	**-1.04%**
R810 Naas Road / R112 Walkinstown Avenue / R112 Kylemore Road	**2030**	3402	3463	3452	1.79%	1.45%	**-0.34%**
	2035	3616	3677	3666	1.68%	1.36%	**-0.32%**
	2045	3771	3832	3821	1.62%	1.31%	**-0.31%**

Table 6-7: Traffic Impact at Key Junction during AM Peak hour (08:00-09:00)

Junction	Design Year	DM Traffic Flows	DS 2023 Scheme (633 Units)	DS 2026 Scheme (635 Units)	2023 Scheme Impact	2026 Scheme Impact	Net Difference in Impact
Old Naas Road / Proposed Development Western Site Access	**2030**	333	471	435	41.28%	30.27%	**-11.02%**
	2035	409	546	510	33.65%	24.67%	**-8.98%**
	2045	422	560	524	32.58%	23.88%	**-8.69%**
Old Naas Road / Proposed Development Eastern Site Access	**2030**	292	522	461	78.46%	57.52%	**-20.94%**
	2035	438	668	607	52.30%	38.34%	**-13.96%**
	2045	452	681	621	50.74%	37.20%	**-13.54%**
R112 Kylemore Road / Old Naas Road	**2030**	1490	1627	1591	9.14%	6.71%	**-2.43%**
	2035	1616	1753	1717	8.43%	6.19%	**-2.24%**
	2045	1684	1820	1784	8.09%	5.94%	**-2.15%**
R810 Naas Road / R112 Walkinstown Avenue / R112 Kylemore Road	**2030**	3693	3803	3772	2.97%	2.11%	**-0.86%**
	2035	3806	3915	3884	2.88%	2.05%	**-0.83%**
	2045	3967	4077	4046	2.76%	1.97%	**-0.80%**

Table 6-8: Traffic Impact at Key Junction during PM Peak hour (15:45-16:45)

The modest reduction of vehicles recorded during the AM and PM peak hour periods demonstrate that the predicted change in traffic movements through each of the four local key junctions, particularly the off-site junctions between (i) R112 Kylemore Road / Old Naas Road and (ii) the R810

Naas Road / R112 Walkinstown Avenue / R112 Kylemore Road junction; are whilst a reduction will be of such a scale that they would be imperceptible in terms of the junctions operational performance.

6.6 CONCLUSION

Notwithstanding the increase in the residential car parking ratio from 0.58 to 0.66 spaces per apartment and the addition of two residential units, the proposed 2026 Phase 2 amendment is predicted to generate lower overall traffic volumes than the permitted 2023 scheme. This reduction is primarily attributable to the substantial decrease in retail floor area, particularly the reduction in supermarket-related trips, which generated a high volume of vehicular trips. As demonstrated by the trip generation assessment and junction impact analysis, the 2026 scheme results in lower traffic impacts at all assessed key local junctions during both the AM and PM peak hours. Accordingly, the proposed amendments are not expected to give rise to any material adverse traffic impacts and, in traffic terms, represent an improvement over the previously permitted scheme.

7 RESPONSES TO LRD OPINION

The following section provides a summary of DBFL responses to the transportation related items raised in the LRD Opinion issued by the Planning Authority. Each item is addressed individually, with reference to the relevant sections of this Traffic and Transport Assessment and the supporting documentation submitted as part of the planning application.

7.1 ITEM 1: SERVICING

a. *The applicant is requested to re-examine and provide clarity on the size and operation of the proposed loading bay to serve the supermarket and other uses within Block C. The spaces appear constrained to serve the proposed uses.*

Response: One of the amendments proposed as part of this application is the size (Gross Floor Area) of the supermarket. The supermarket has been redesigned in response to market / operator influences resulting in a reduction in the size of the supermarket unit. The reduction in unit sized has had a direct impact upon its logistical requirements including the size of rear stores (e.g temporary storage), and quantum of goods transferred and accordingly size of delivery vehicle, size of loading area and size of service yard. In consultation with market agents, its has been established that the smaller store will be serviced by a 10m rigid lorry (for goods collection and delivery including cold storage and dry goods vehicles). This 10m rigid lorry is significantly smaller to the articulated lorry that would have been ideally required to service the previous larger permitted supermarket unit. The loading bay, service yard and access route have subsequently been redesigned to accommodate both a 10m rigid lorry and a rigid waste collection vehicle. compared to the articulated lorry that was necessary for the larger unit.

Accordingly a smaller dedicated loading bay and service yard has been provided on the eastern side of the site to serve the supermarket and associated commercial units. Swept path analysis has been undertaken for a 10m rigid lorry, demonstrating that the service yard can be accessed, utilised, and exited safely. The vehicle tracking assessment is illustrated on DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105 which confirms that the proposed service yard and loading bay dimensions provide sufficient manoeuvring areas to accommodate the new smaller design vehicle without conflict with other site users. Accordingly, the proposed loading facilities are considered adequate to serve the new design proposals and provide an appropriate level of servicing provision for the supermarket and other uses within Block C.

b. *The applicant is requested to submit auto-tracking assessments for all anticipated vehicle types accessing the internal road, including refuse trucks, light vans, emergency service vehicles, service vehicles and passenger vehicles. The applicant should submit auto-tracking drawings of vehicles that are anticipated to use the service yard and loading bay for retail use. Revised drawings should clearly demonstrate the delivery vehicles can enter, turn and exit the servicing yard and loading bay, and access/egress the service yard in forward gear.*

Response: The requested vehicle tracking assessment is presented in the accompanying DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105, which demonstrates that the internal road network, service yard, and loading facilities have been designed to accommodate the anticipated vehicle types associated with the proposed development.

c. *It is considered that a servicing/loading bay is required to serve the residential units. The applicant is requested to examine the potential of incorporating a servicing/loading bay along the internal roadway. Auto tracking should be provided to demonstrate the proposed servicing/loading bay can safely accommodate light vans or other delivery vehicles.*

Response: In response to the above request a dedicated 'courier' bay of sufficient size to accommodate a light goods vehicle such as a van has been proposed on-site adjacent the eastern boundary of the site and accessed via the internal access road. The vehicle tracking assessment for the dedicated bay is presented in in the accompanying DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105.

d. *The applicant is requested to provide further detail on waste collection. Waste/refuse collection shall take place on site and not on the public road. The applicant shall clearly designate an area for waste collection.*

Response: A dedicated service yard is provided within the development for waste collection and servicing activities. The service yard has been designed to facilitate on-site waste collection operations, ensuring that refuse vehicles can enter, service the development, and exit without requiring waste collection activities to take place on the external public road. Further details are provided in the accompanying *Delivery and Servicing Plan* (DSP) report has been prepared as part of the application documentation. The DSP provides further detail on the proposed servicing and waste management arrangements, including the operation of the dedicated service yard and the procedures for waste collection associated with the development. The vehicle tracking assessment for

the waste collection vehicle is presented in in the accompanying DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105.

e. *A Service Delivery and Access Strategy shall be submitted as part of the application. The applicant is referred to section 2.4 Service Delivery and Access Strategy of Appendix 5 of the Dublin City Development Plan 2022-202, which provides information that should be contained within a Service Delivery and Access Strategy.*

Response: A *Delivery and Servicing Plan* (DSP) report has been prepared in response to the above request and accompanies the planning application.

7.2 ITEM 2: TAKING IN CHARGE

a. *The applicant is requested to revise the red line boundary to incorporate the 3 no. public on-street car parking spaces along Old Naas Road. The proposed works to the road will require a letter of consent to be obtained from the Transportation Planning Division. The applicant is advised to engage with the Transportation Planning Division as soon as possible to secure a letter of consent for the proposed works. There should be no private structures / infrastructure above or below ground within the existing or proposed taking in charge areas including outwards swinging doors.*

Response: Further to engagement with DCC transport division and the subsequent issuing of letter of consent, the highlighted 3 no. public on-street car parking spaces along Old Naas Road are now located within the amended red line boundary. Please refer to Henry J. Lyons proposed taking in charge layout, detailed in drawing PRL-HJL-ZZ-DR-A-0015

7.3 ITEM 3: CYCLE PARKING

a. *A reduction in the quantum of short stay bicycle parking below the Development Plan standards may be considered, provided that the spaces are of a high quality, conveniently located and readily accessible for visitors. In this regard, the provision of 70 no. short stay bicycle parking spaces would be considered acceptable.*

Response: The cycle parking proposals have been reviewed and revised. The proposed short-stay cycle parking provision has been increased from 70 spaces to 84 spaces,

exceeding the level referenced in the LRD Opinion. As outlined in further detail within Section 5.4.2 this results in an overall increase in short bike parking from the previously permitted 43.5% to 53% of DCC's requirement representing a notable increase.

b. The applicant should provide further details on the cycle parking in the Stage 3 LRD application, ensuring that all cycle parking complies with the National Transport Authority's Cycle Design Manual, 2023. Specification of bicycle parking stands, including the double-stacked cycle stands and cargo bike stands should be provided to demonstrate sufficient operating space is allocated for use.

Response: As detailed further in Section 5.4 the proposed Phase 2 development proposals include the delivery of 1,104 bicycle parking spaces on-site incorporating;

- 1016 secure and weather protected long term bicycle parking spaces within dedicated internal bike stores for residents and staff, in addition to
- 88 number short term spaces externally at ground level for visitors (for Phase 2 and Phase 3)..

c. The applicant is requested to submit revised drawings showing 10no. Sheffield parking stands to be provided at Level 00 level adjacent to the entrance to the supermarket.

Response: In response to Item (c), a total of 18 Sheffield stands (36 cycle parking spaces) are now provided adjacent to the supermarket entrance, significantly exceeding the requested provision of 10 Sheffield stands. These stands are located in a prominent and convenient location to serve visitors to the commercial units and supermarket. Please refer to Section 5.4 for further details and the accompanying landscape architects drawings.

d. The entrance to the large cycle parking store (adjoining the supermarket) at Level 00 within Block C appears be via the car park entrance only. The applicant is requested to investigate the opportunity to provide an additional cyclist access along the western elevation.

Response: In response to Item (d), an additional dedicated cyclist access has been incorporated to the large cycle parking store adjoining the supermarket. This provides improved accessibility for cyclists and supplements the access arrangements previously available. The revised access arrangement to/from this bike store is illustrated in the **Figure 7-1** below.

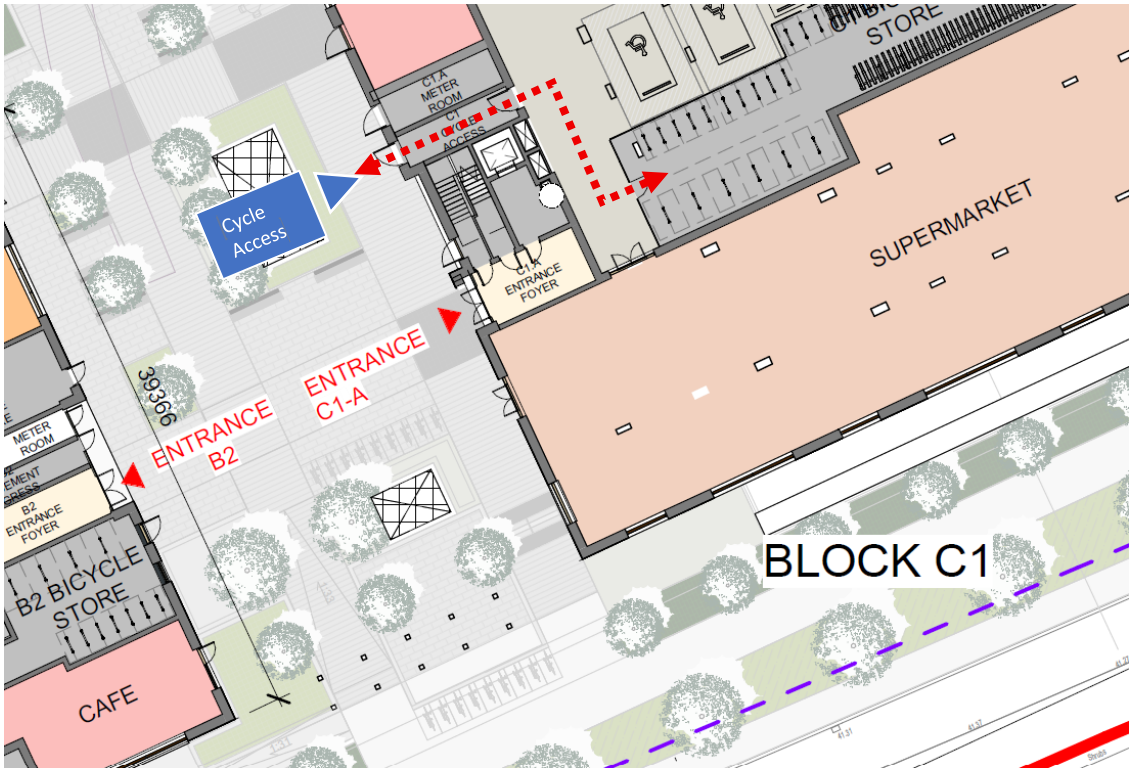


Figure 7-1: Cycle Access to Cycle Parking store adjoining the Supermarket

7.4 ITEM 4: CAR PARKING

a. The applicant is requested to provide a revised site layout plan for basement and ground floor levels, clearly denoting the intended use of the car parking spaces including residential, retail and /or other uses. This drawing should also provide detail on the 259 no. spaces with EV charging, with EV charging spaces clearly demarcated. The remaining parking spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging

Response : Refer to Chapter 7 Parking Management Strategy and the associated figures within this chapter which denote the intended use of each car parking space in addition to those assigned as EV parking bays.

b. With regard to the 9 no. car share parking spaces, a stated expressions of interest from at least 1 no. car-share operator should be included with the application to demonstrate feasibility.

Response : Please Refer to Appendix B which includes a letter of support for car share spaces from specialist operators Enterprise Car Club.

c. The applicant is requested to submit a Car Parking Management Plan clarifying how the parking spaces will be managed.

Response : The car parking management strategy is outlined in Chapter 5 of this report

7.5 ITEM 5: REPORTS & DRAWINGS

"The applicant is requested to submit the following drawings and reports at the LRD application stage:

a. Walking and Cycling Audit

b. Car Parking/Cycle Parking Management Plan

c. Outline Construction Management Plan- including information on the timeline of construction and completion of the different phases across the site.

d. Mobility Management Plan including a Residential Travel Plan

e. Service Delivery and Access Strategy

f. Outline Construction Demolition Waste Management Plan

g. Operational Waste Management Plan

h. Operational Management Plan"

Response: The requested supporting reports and plans have been submitted as part of the LRD application documentation.

- **Walking and Cycling Audit:** A Walking and Cycling Audit has been undertaken and reported within the Quality Audit report prepared by Bruton Consulting Engineers. This Quality Audit report accompanies the planning application.
- **Car Parking / Cycle Parking Management Plan:** Details of the proposed car parking and cycle parking management arrangements are provided within Chapter 5 and Chapter 7 of this report.
- **Mobility Management Plan / Residential Travel Plan:** A separate standalone Mobility Management Plan (MMP) report, incorporating a Residential Travel Plan, has been prepared and submitted as part of the planning application.
- **Service Delivery and Access Strategy**: The requested *Service Delivery and Access Strategy* report has been prepared and accompanies the planning application. The strategy outlines the proposed servicing, delivery, and access arrangements for the development.
- The Outline Construction Management Plan, Outline Construction Demolition Waste Management Plan, Operational Waste Management Plan, and Operational Management Plan have been prepared by the relevant specialist consultants and are submitted as part of the application documentation.

8 SUMMARY AND CONCLUSION

8.1 DEVELOPMENT FRAMEWORK

The subject lands are zoned ***Strategic Development and Regeneration Areas (SDRA 5)*** within the DCC Development Plan 2022-2028. The DCC Development Plan also identifies the site and its immediate environs as a ***Key Urban Village*** (KUV) and advocates the delivery of the development that respects the 15-minute city concept. The subject SDRA 5 site is noted as being located within lands subject to the ***City Edge*** project.

In reference to the *Sustainable Residential Development and Compact Settlements Guidelines*, the Royal Liver site is classified as a ***City-Urban Neighbourhood*** which in terms of its **existing** baseline 2026 accessibility levels is classified as a ***High Capacity Public Transport Node or Interchange***. In such locations the guidelines state that ***"car parking should be minimised, substantially reduced or wholly eliminated".***

The City Edge Project is a transformative cross boundary initiative by DCC and SDCC, re-imagining the Naas Road, Ballymount and Park West areas at the western edge of Dublin City. A Strategic Framework has been prepared (in advance of a statutory plan) that seeks to set out a high-level approach for the regeneration of the defined City Edge brownfield lands to create a new liveable, sustainable and climate resilient urban quarter.

The Royal Liver site is located within the Strategic Frameworks defined Naas Road District which has been identified as the ***Primary Town Centre*** for the entire City Edge area with Kylemore Road to exhibit ***high street*** characteristics. The framework proposes

- an Inner Orbital Public Transport Corridor (along Kylemore Rd – Walkinstown Ave corridor) with an interchange located **"north of the intersection with the Naas Road"** adjoining the subject Royal Liver site.
- A New transport hub (Arterial Bus / LUAS / Orbital Bus) identified at the Naas Rd / Kylemore Rd Junction
- New LUAS Lucan line adjoining the Grand Canal corridor (between Kylemore Road and Blackhorse Bridge) and along Kylemore Rd to/from the Ballyfermot direction.
- New DART Commuter station on Kylemore Rd with new 'Transport Hub' for interchange with LUAS and Orbital bus circa 985m to the north of the subject Royal Liver Site

Influenced by the existing (LUAS and Bus), emerging (BusConnects and Cycle Connects) and proposed (Lucan LUAS and DART+ South West Interchange) public transport options the Strategic

Framework documentation includes a high level framework for parking within the City Edge area. Respecting the 15-minute City concept this parking framework advocates zero to low car parking provision in areas which are highly accessible and with strong public transport connectivity. In terms of the sites access to rail, high frequency bus, retail and education the framework suggests that a parking provision in the region of 0 to 0.65 per residential unit would be appropriate for the subject Royal Liver Phase 2 amendment. Further to consultation with DCC transportation division, the proposed provision of 0.66 has been considered appropriate in light of long term delivery of some of the City Edge public transport initiatives.

8.2 PARKING STRATEGY

The subject Phase 2 amendment proposals incorporate a total of 514 no. parking spaces for the proposed 635 apartments and commercial units.

This proposed 2026 Phase 2 car parking provision includes:

- **Residents** – a total of 419 no. car parking provision for Phase 2 units resulting in a ratio of 0.66 spaces per unit.
- **Visitors** – A total of 7 no on-site spaces. Whilst no specific requirement (quantum) for visitor car parking is detailed in the 2022-2028 DCC Development Plan.
- **Car Share** – A total of 5 no. car share is proposed as part of the amended Phase 2 development. These car share vehicles are located in the Phase 2 the podium car parking
- **Non-Residential (Retail, Cafes, Creche, Community Uses)** – A total of 79 no car parking provision for non-residential are provided at podium level.
- **Courrier Bay**- A total of 1 No. Courrier bay is provided external near block C,D

The above car parking provision will include 257 no. EV car parking spaces and 25 no. accessible parking bays in accordance with DCC development management standards.

A total of 1104 no. cycle parking is proposed for the amended Phase 2 development which includes 1016 Long and 88 short term spaces (to supplement those already permitted in Phase 1 scheme).

8.2.1 Traffic Impact

To establish the existing baseline traffic movements, new traffic surveys were commissioned and undertaken by IDASO on Thursday, 22 May 2025, at both the Kylemore Road (R112) / Old Naas

Road junction and the Naas Road (R810) / Kylemore Road (R112) / Walkinstown Avenue (R112). The surveys identified that the weekday AM peak hour occurs between 08:00 - 09:00, while the PM peak hour occurs between 15:45 - 16:45.

Notwithstanding the increase in the residential car parking ratio from 0.58 to 0.66 spaces per apartment and the addition of two residential units, the proposed 2026 Phase 2 amendment is predicted to generate slightly lower overall traffic volumes than the permitted phase 2 element of the 2023 scheme. This reduction is primarily attributable to the substantial decrease in retail floor area, particularly the reduction in supermarket-related trips, which generated a high volume of vehicular trips. As demonstrated by the trip generation assessment and junction impact analysis, the 2026 scheme results in lower traffic impacts being generated at all key local junctions during both the AM and PM peak hours. Accordingly, the proposed amendments are not expected to give rise to any material adverse traffic impacts and, in traffic terms, represent an improvement over the previously permitted 2023 scheme.

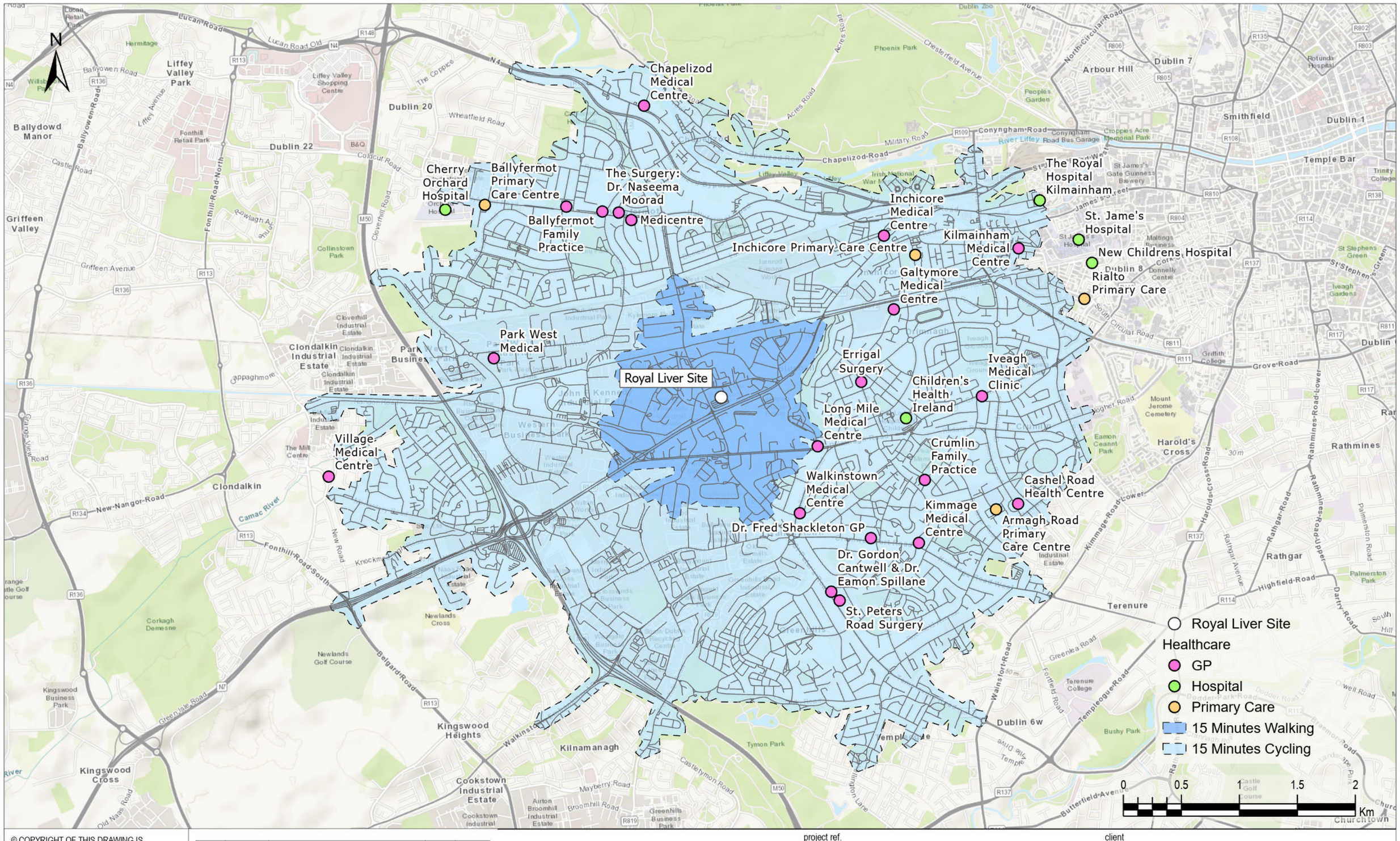
8.3 CONCLUSION

The amendments proposed as part of this application are not predicted to give rise to a significant impact upon the operational performance of the local transportation network. The proposed off-site infrastructure enhancements contribute significantly to mitigating the modest level of impact that is projected in reference to the baseline scenario. When compared to the permitted 2023 scheme the proposal actually represents an improvement, with a lower quantum of vehicle trips predicted to generated at the following two key junctions in the 2045 future design year.

- Old Naas Road / Proposed Development Western Site Access: -4.23% in AM, -8.69% in PM
- Old Naas Road / Proposed Development Eastern Site Access: -6.64% in AM, -13.54% in PM

Accordingly, in terms of transportation, the proposals represent a very modest, yet beneficial change when compared to the previously permitted 2023 scheme proposals . The scale of impact predicted to be generated on the local road network has been established as not having any material adverse impact upon either the operational performance or safe function of the local transportation networks.

Appendix A : Catchment Analysis



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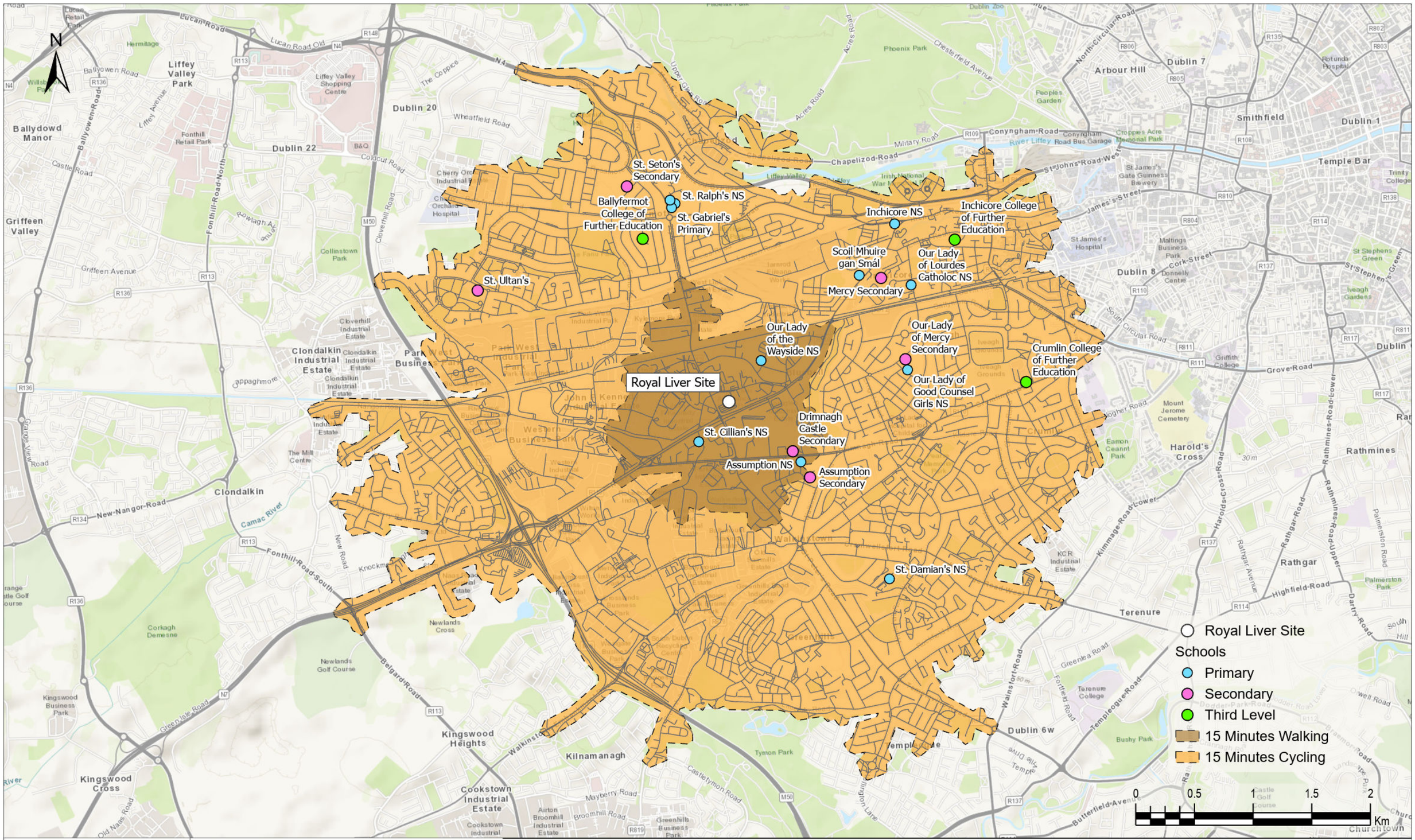
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Walking and Cycling Catchments - Healthcare

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drawing title

Walking and Cycling Catchments - Schools

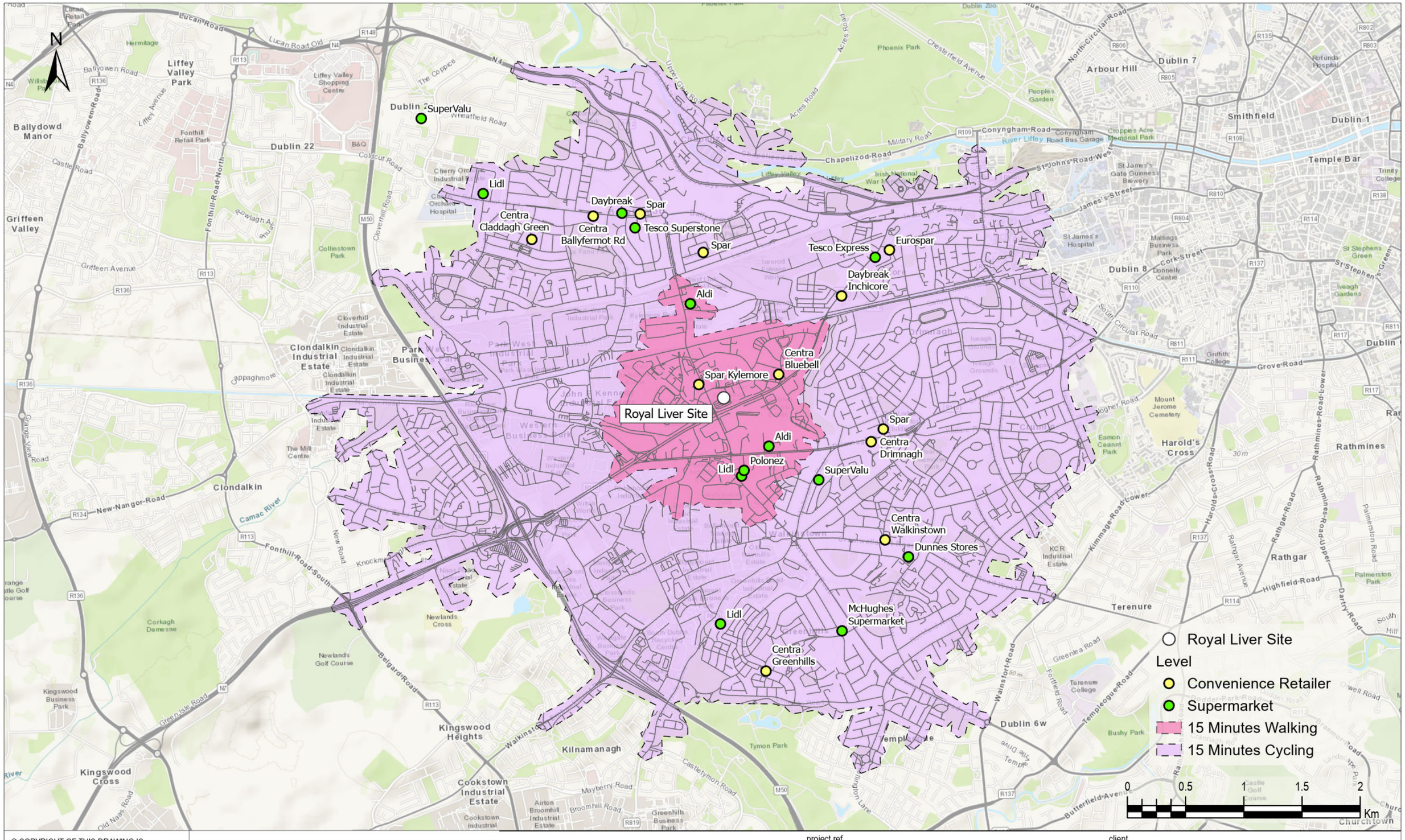
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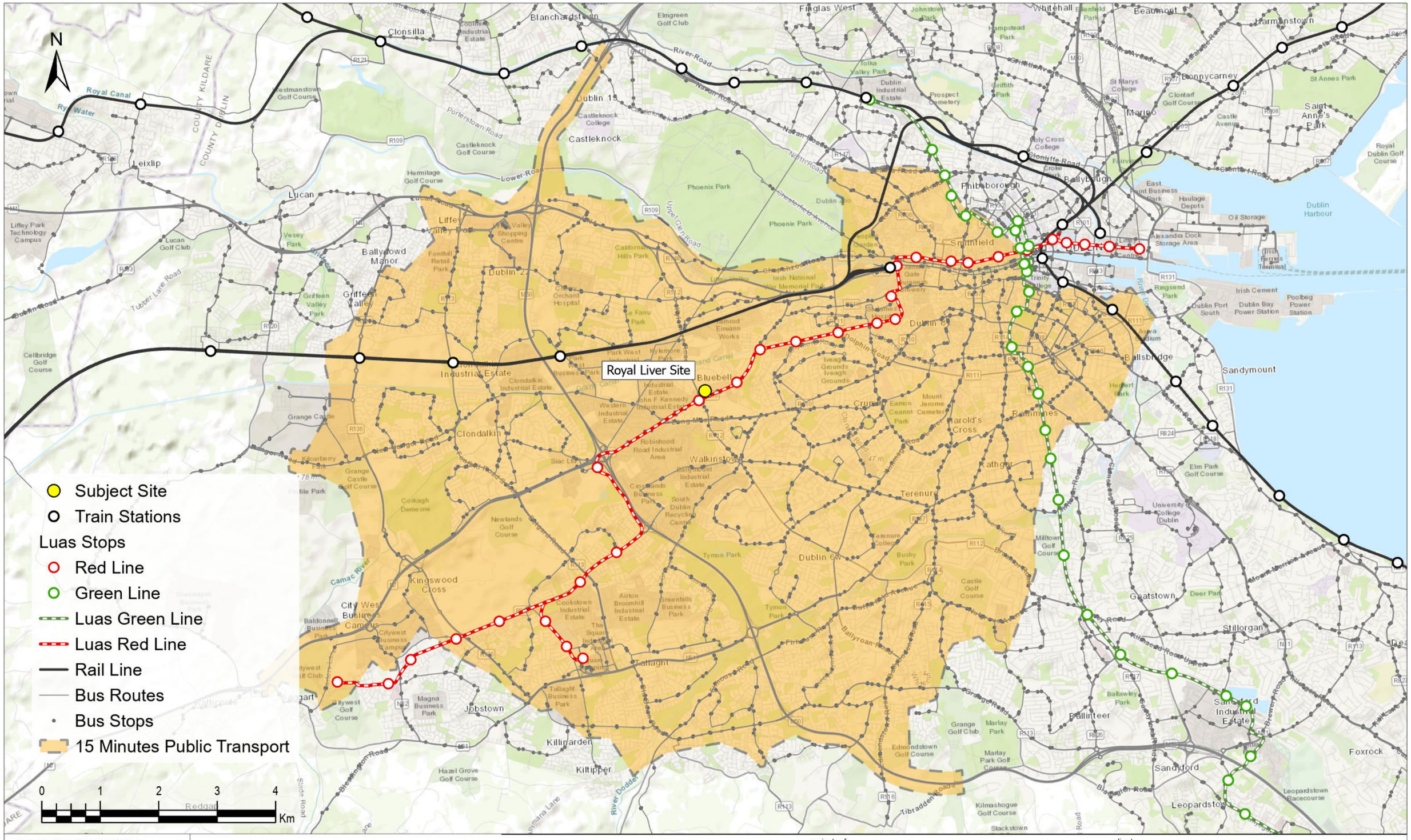
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Walking and Cycling Catchments - Supermarkets

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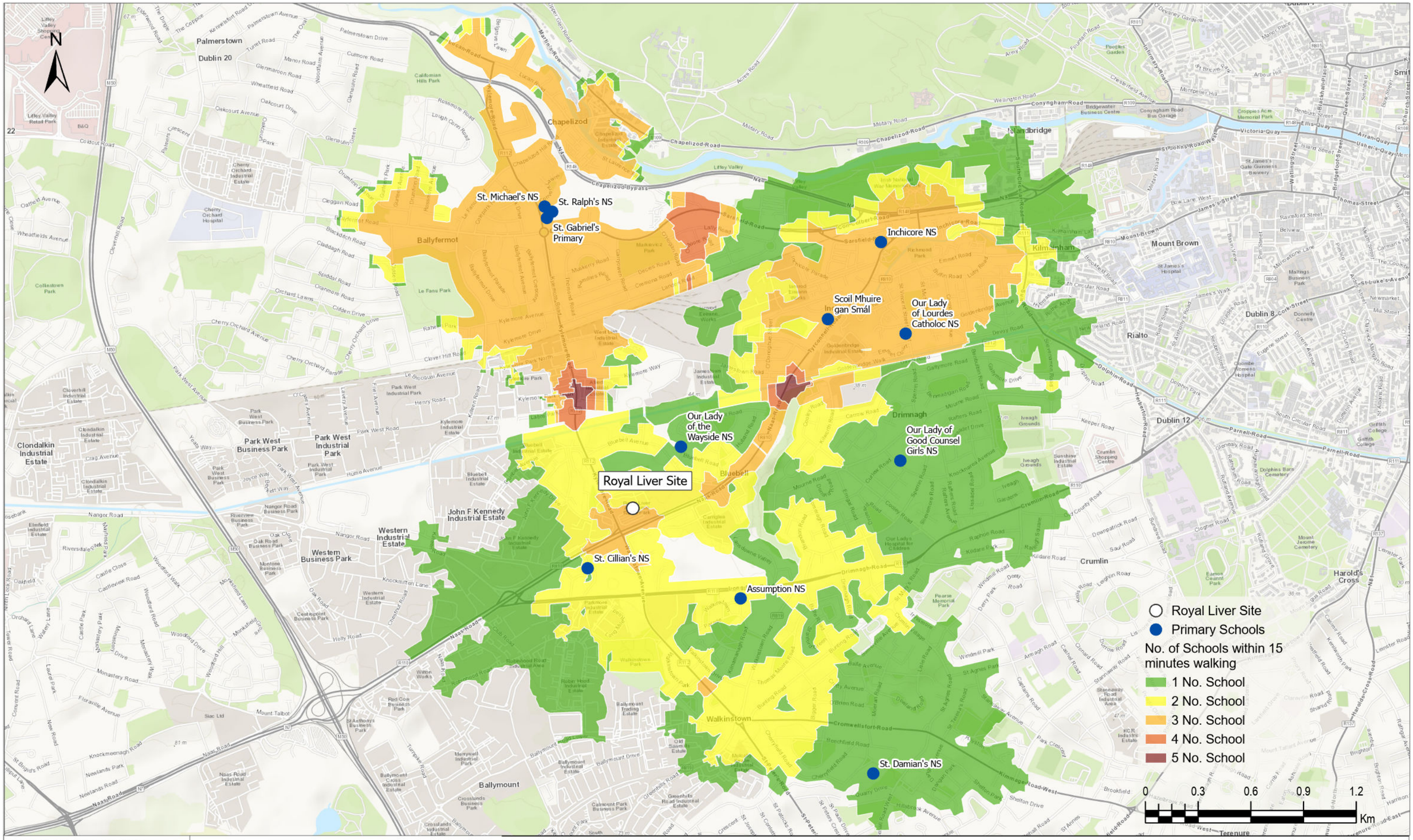
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Public Transport Catchment

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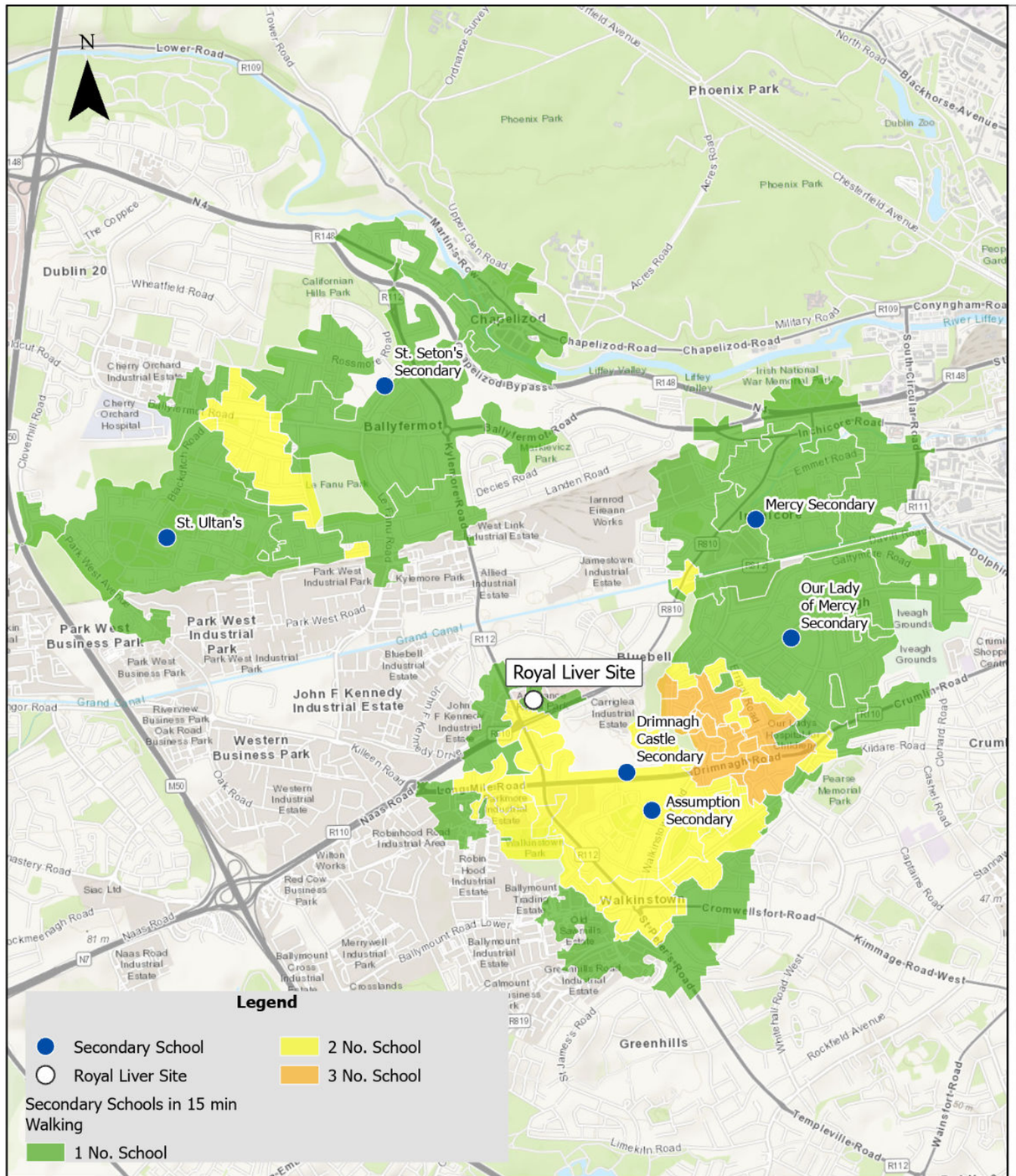
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Primary School Accessibility Levels (15 minutes

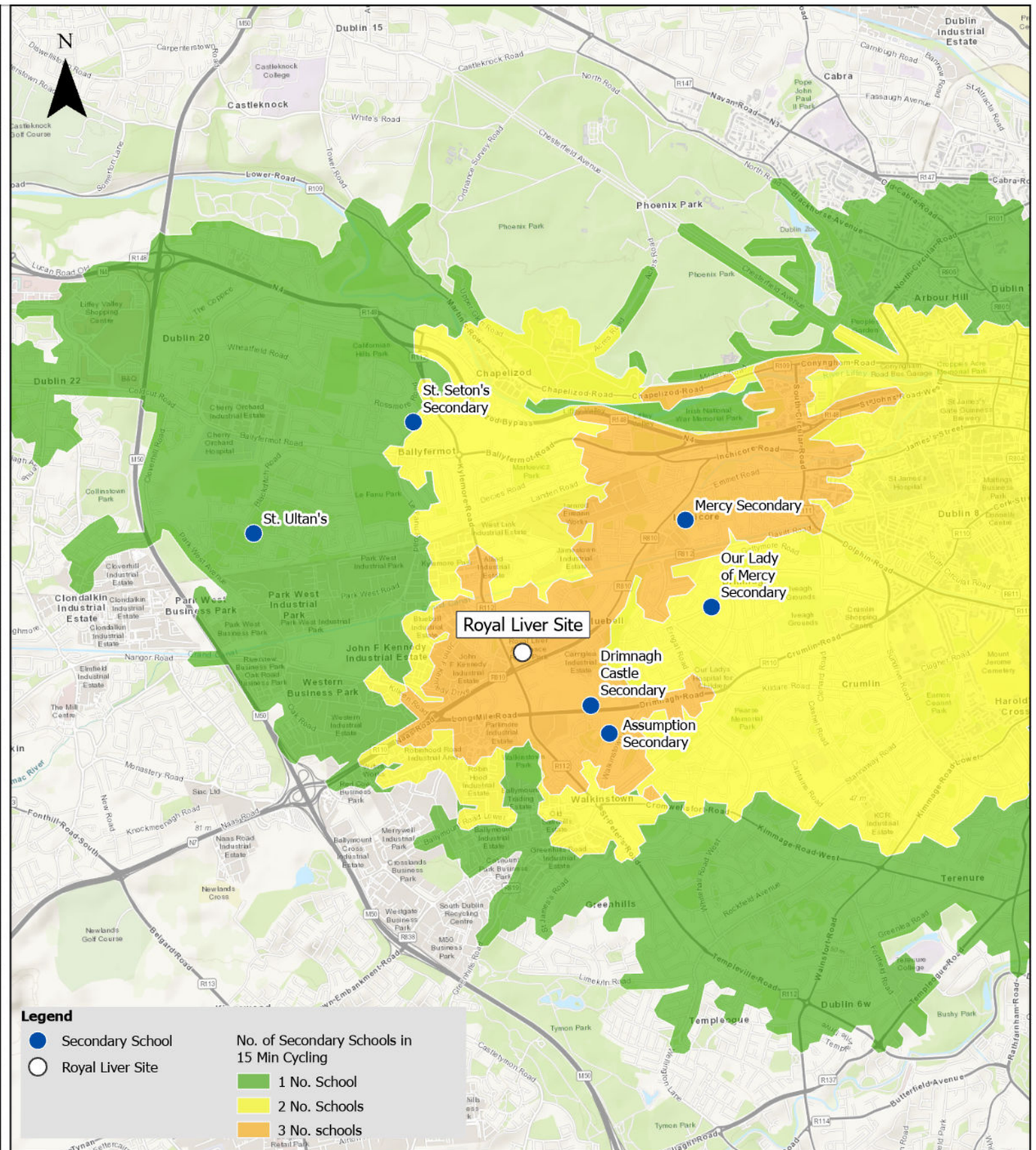
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15 MINUTES WALKING



15 MINUTES CYCLING

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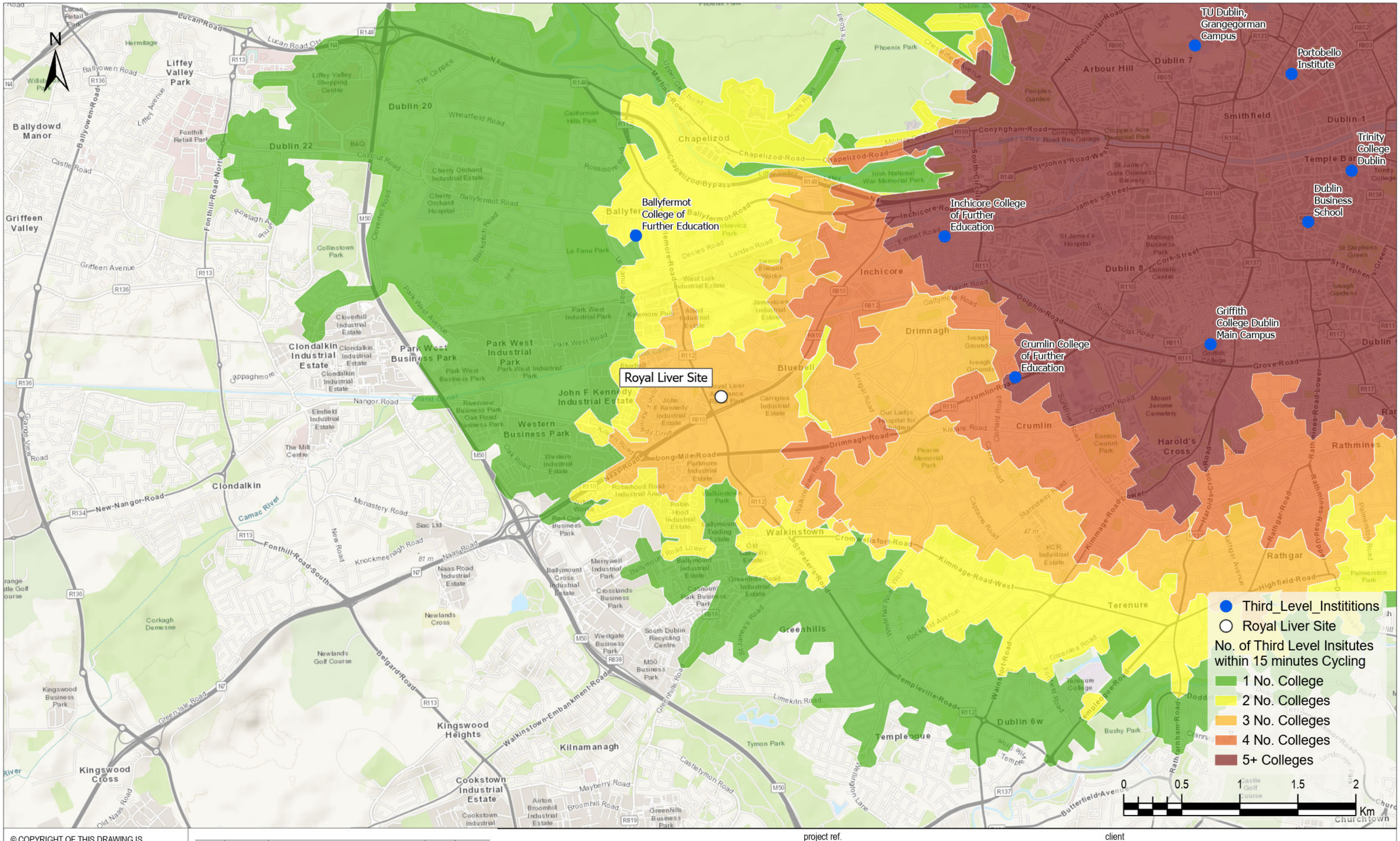
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Secondary School Accessibility Levels (15 minutes Walking and Cycling)

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Third Level Insitution Accessibility Level (15 Min Cycling)

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VJ	TJ	1:30,000	A3

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Appendix B : Car Share- Letter of support

To Whom it May Concern,

This letter confirms Enterprise Car Club's interest in providing a car sharing service at the proposed Royal Liver Site development on the Naas Road, Dublin 12, in partnership with the Land Development Agency.

Enterprise Car Club is a self service, hourly vehicle rental service available to members 24 hours a day, 365 days a year. Vehicles can be reserved in advance or accessed at short notice through a dedicated mobile app. Operating across multiple cities and communities in Ireland, our members benefit from access to a network of cars and vans designed to support flexible and sustainable mobility.

Should the development proceed as proposed, Enterprise Car Club would be interested in working with the developer to introduce a fully managed car sharing solution at the site. This would include vehicle provision, membership management, insurance arrangements, vehicle maintenance, cleaning, customer support, technology platform management, operational reporting, and all other aspects of day to day car share operations.

The provision of dedicated car share vehicles within residential developments can support sustainable transport objectives by reducing private car ownership and dependency, lowering traffic congestion, and contributing to reductions in noise and air pollution. It can also assist in making more efficient use of land by reducing the overall demand for private parking spaces.

Accordingly, Enterprise Car Club considers the proposed allocation of five dedicated car share spaces at the development to be feasible and appropriate for a scheme of this nature. We would welcome the opportunity to engage further with the Land Development Agency and the site developer to explore the implementation of a car sharing service, subject to the granting of planning permission.

Marie Hannigan

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