



Connolly Quarter SHD - Case Number: 305676

1.0 Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. We want to make Dublin a safe and friendly place for everyone of all ages to cycle.

Our comments on this application are limited to the bike parking, car parking and surrounding road environment. Though we do welcome compact urban development as it can reduce trip distances, which makes the bike a potential transport mode, we are not qualified to make observations on the entire development proposal.

We must highlight that even though the application is being made by a third-party developer, it is made with the consent of landowner and state body CIÉ. This development is taking part on CIÉ land that is currently used for a strategic public transport function.

2.0 Public Bike Parking at Connolly Station

The proper integration between cycling and public transport is a key part of building a sustainable multimodal transport network in Dublin. There is currently only a very limited amount of publicly available bike parking at Connolly station.

Policy Objective 8.2 of the *National Cycling Policy Framework* states that high-quality public bike parking facilities should be provided at public transport stations. Connolly Station is a strategic public transport hub in Dublin. CIÉ was identified as one of the key stakeholders required in delivering high-quality and high-density bike parking at strategic rail hubs like Connolly Station.

The *National Cycle Manual* recommends that the number of bike parking spaces is equal to 2.5% of number of daily boarders at each station.

The *Dublin City Development Plan 2016-2022* states that cycle parking at train stations should be “7 per number of trains at the two-hour peak period a.m. (minimum of 100 spaces)” (Table 16.2. Pg. 266)

Policy MT9 of the city development plan states:

To promote Bike and Ride at public transport hubs by providing secure, dry, bike parking facilities.

Objective MTO8 of the city development plan states:

To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities at appropriate locations, taking into consideration (inter alia) the NTAs Cycle Network Plan, Dublin City Centre Cycle Parking Strategy, and Dublin City Council’s Public Realm Strategy.

Connolly station was identified by the *Dublin City Centre Cycle Parking Strategy* to be the busiest public transport hub for alighting passengers and was identified as the third highest priority location for high density bicycle parking (pg 67).

There is both strong local and national policy to provide high-density bike parking facilities at Connolly station in the interests of sustainable development of the city.

We recommend that An Bord Pleanála seek further information from the developer and CIÉ about where future high-density bike parking facilities will be created at Connolly station if the station car park area is to be used for office and apartment redevelopment and for 180 CIÉ car parking spaces.

3.0 Proposed Underground Bike Parking in Development

The proposed development includes 1,406 bicycle parking spaces. This is welcome.

However, access to each of these bike cages seems impossible if all of the car parking spaces are in use. For example, on the architect’s drawing *29 Overall Basement Plan Level B1*, it looks like it might not be possible to access the bike parking for Block C if loading bay and car parking spaces 27-33 are in use. Consideration should be given to re-arranging the car parking to provide clearer access to the bike parking areas.

The same drawing also shows that the proposed bike ramp will only be 1.9m wide. This is insufficient for two-way bicycle track, especially given that this is a ramp. The *National Cycle Manual* requires two-way bicycle tracks to be a minimum of 2.5m and additional width to be provided on steep gradients. The current width presents a safety risk that should be increased to mitigate this risk.

4.0 Parking in Development

There are 58 car parking spaces proposed for the residential part of the development. All of these car parking spaces, with the exception of the accessible spaces, will be for car sharing. This is welcome as it will encourage travel by means other than by private car. Traffic reduction is a key goal of Dublin Cycling Campaign's road danger reduction strategy. It also follows national guidelines to significantly reduce or eliminate car parking around strategic public transport options.

However, the development also includes 180 parking spaces for the use of CIÉ in Block B at podium deck level. No justification has been provided in the application for these 180 car parking spaces. No details on how this car park will operate is included in either the *Traffic Impact Assessment* or the *Mobility Management Plan*. Are these car parking spaces for the exclusive use of CIÉ's fleet, for staff car parking or as a public car park?

In our opinion, the construction of these 180 car parking spaces should be considered as part of the development instead of as an existing use. These 180 car parking spaces as proposed do not currently exist. Nor is there a justification provided for them other than in the *The Response to An Bord Plenála's Pre-Application* which says:

There are currently 390 existing car parking spaces on site for CIE use. The development agreement requires 180 spaces of these to be maintained for CIE's use. As part of the SHD submission, 135 CIE spaces are accommodated within the Block B podium deck. As was stated previously the legal opinion obtained (Appendix 1) states that the development agreement between the applicant and CIE acts as a burden on the site and is in effect 'a restrictive covenant' on the site. As such these 180 spaces cannot form part of the proposed development and accordingly cannot be included as a use for the purposes of calculating the extent of 'other uses.

Whether or not maintaining the 180 car parking spaces as part of the development is part of the agreement between CIÉ and the developer is irrelevant in determining if this is sustainable development or not.

We recommend that An Bord Plenála seek further information. No clarity has been provided on the justification and future use of these newly constructed car parking spaces.

5.0 Cycling facilities on surrounding roads

As identified in the *Designer Response to Road Safety and Quality Audit*, the existing cycling facilities around the proposed development are below the standards of the *National Cycle Manual*.

Seville Place is secondary route C8 in the *Greater Dublin Area Cycle Network Plan*. It currently includes a narrow advisory lane in the door-zone of parked cars, which is a road safety hazard. Engineering drawing 0008 – *Access Layout Oriel Street and Seville Place*. The developer should work in consultation with the local Roads Authority to remove this safety risk for people cycling on Seville Place.

Consideration should be given to connecting the cycle lanes on Seville Place to the cycle lane through Connolly Quarter's square to the underground car parking. This would create a legible and connected cycle network for people cycling.

Engineering drawing 0013 – *Hotel Set – Down Area Sherriff Street Lower Plan Layout* shows that the existing poor quality cycle tracks on Sheriff Street Upper will be upgraded as part of this development. This is vital as the existing cycle tracks are a safety hazard. These cycle tracks will in future provide a high-quality connection to the Clontarf to City Centre cycle route, which will start construction in Q2 2020.

5.0 Conclusion

In our opinion this development needs to address a number of outstanding issues:

1. The future location of high-density cycle parking at Connolly station if the existing Connolly car park is to be re-developed without any new public bike parking
2. Ease-of-use of the proposed cycle parking for residents and office staff of the development
3. The unjustified 180 car parking spaces that have no parking management plan
4. The safety issues of the existing or proposed cycle facilities on adjoining roads

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