

Planning Authority's Report on Submissions received during the Statutory Public Consultation period for the Proposed Amendment of the Cherrywood SDZ Planning Scheme relating to Residential Car Parking Standards (Section 4.2.10 of the Approved Planning Scheme, 2014 (as amended)).

Report submitted in accordance with Section 170A (8) and (9) of the Planning and Development Act, 2000 (as amended).

1. INTRODUCTION

Dún Laoghaire-Rathdown County Council as the Development Agency appointed by Government to promote the Cherrywood Strategic Development Zone (SDZ) Planning Scheme made an application to An Bord Pleanála on 31 May 2023 to amend the approved Cherrywood Planning Scheme, 2014 (as amended), in relation to Residential Car Parking Standards, Section 4.2.10 Car Parking Standards.

The main reasons for the Proposed Amendment in summary are as follows:

- To update the Planning Scheme to align and accord with changed and emerging national, regional and local policy context relating to car parking, and to promote sustainable public and active travel modes, and climate change mitigation measures.
- To guide the provision of an appropriate level of car parking provision, including having regard also to the need to consider car ownership and usage trends, changes in travel behaviour, climate action, and emerging best practice in relation to car parking.
- To set out reduced maximum car parking standards for residential development across each of the residential density zones (Res 1 – Res 4) and within the Town Centre and Village Centres, and for shared car spaces.
- To reduce the maximum residential car parking standards as proposed by way of this Amendment to take cognisance of proximity to public transport services, the ambitious modal split targets for sustainable transport modes as set in the Cherrywood Planning Scheme, and the potential for car sharing and other recent and emerging innovations in car parking.

An Bord Pleanála ('the Board'), as the relevant Competent Authority, notified the Planning Authority on 17 May 2024 regarding their determination, under Section 170A(4)(b), that the proposed Amendment to the Cherrywood Planning Scheme constitutes a material change but that which falls within the criteria set out in subsection 3(b). Therefore, in accordance with Section 170A (7) of the Planning and Development Act, 2000, as amended, Dún Laoghaire-Rathdown County Council, as the Development Agency for the Cherrywood SDZ, is required to undertake and document a formal statutory public consultation process.

Further in accordance with the provisions of Sections 170A (8) and (9) of the Planning and Development Act, 2000, as amended, not later than eight (8) weeks after giving public notice, the Planning Authority, shall prepare and submit a Report on any submissions or observations received as a consequence of that notice, and shall submit the Report to the Board for its consideration.

2. PUBLIC CONSULTATION

Section 170A (7) of the Planning and Development Act (PDA) 2000, as amended, sets out the requirements regarding undertaking public consultation in respect of this proposed Amendment of an adopted Planning Scheme, including sending notice and copies of the proposed amendment of the Planning Scheme to the Minister and the prescribed bodies. On Friday 31 May 2024, details of said public consultation were published in newspaper notices in The Irish Times, The Irish Independent, and The Herald. Public consultation took place over a four-week period from Friday 31 May 2024 to Monday 1 July 2024 inclusive including two public in-person information sessions facilitated by DLR personnel.

In compliance with the public consultation requirements, a copy of the proposed Amendment, along with the Reports to Inform Screening for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) in accordance with subsection (6)(b) were available for inspection at the locations below, for the consultation specific period of not less than four (4 no.) weeks.

- (a) The Planning Department, County Hall, Marine Road, Dún Laoghaire, between 10am to 4pm Monday to Friday, excluding bank holidays, and
- (b) The Council Offices, Dundrum Office Park, Dundrum, between 9.30am to 12.30pm and 1.30pm to 4.30pm Monday to Friday, excluding bank holidays, and
- (c) Via the DLR Consultation portal on the Council's website homepage <https://www.dlrcoco.ie> and at <https://dlrcoco.citizenspace.com>.

Public Information Sessions – attended by Forward Planning Infrastructure Planning Officials were held for the dates and venues below:

Venue	Date	Time
County Hall, Marine Road, Dún Laoghaire	Tuesday 11 June 2024	10.00am - 1.00pm
Beckett Park Pavilion, Castle Street, Cherrywood	Wednesday 19 June 2024	5.00pm - 8.00pm

Written submissions or observations with respect to the Proposed Amendment and associated Reports to Inform Screening for SEA and AA were invited from members of the public and other interested parties including children or groups or associations representing the interests of children and could be made in writing to the Planning Authority not later than Monday 1 July 2024 at 5pm as follows :

- (a) Online at <https://dlrcoco.citizenspace.com> or
- (b) By email to FPIadmin@dlrcoco.ie, or
- (c) In writing to Administrative Officer, Forward Planning Infrastructure Department, Dún Laoghaire-Rathdown County Council, County Hall, Marine Road, Dún Laoghaire, Co. Dublin.

Under Section 170A(8) of the PDA, the Planning Authority shall prepare a report on any submissions or observations received and shall submit the report to the Board for its consideration.

3. SUBMISSIONS RECEIVED

A total of eleven (11 no.) submissions (including five (5) submissions from prescribed statutory bodies) were received on the Proposed Amendment No. 9 during the statutory public display period prescribed under Section 170A (7). A List of the Persons / Bodies and respective Statutory Bodies who made submissions or observations is set out hereunder.

List of Persons or Bodies who made Submissions/Observations

No.	Sub. Ref. No.	Name
1	ANON-R2J6-XF3D-S	Christopher Maher
2	STAT 01	EPA
3	ANON-R2J6-XF3T-9	Rob Flanagan
4	STAT 02	Transport Infrastructure Ireland
5	Sub 01 – By-E-mail	BMA Planning (for Hines Cherrywood Development Fund ICAV)
6	STAT 03	Department of Education (Forward Planning Section)
7	ANON-R2J6-XF3A-P	Daniel Burns
8	STAT 04	Minister Ryan (Minister, Department of Transport))
9	Sub 02 – By E-mail	Stephen Little and Associates (for Quintain Developments; Ronan Group, William Neville & Sons)
10	Sub 03 – By-E-mail	John Spain and Associates (on behalf of Manciano Ltd)
11	STAT 05	National Transport Authority

Each submission has been fully considered and a summary of the issues set out, along with the Planning Authority's Response in Sections 7 and 8 below. The Planning Authority's Response to the submissions/issues takes account of the proper planning and sustainable development of the area, the objectives of the adopted Planning Scheme, statutory obligations, and relevant Government policies and objectives.

No submissions were received on the Report to Inform Strategic Environmental Assessment (SEA) Screening, nor on the Report to Inform Appropriate Assessment (AA) Screening.

4. STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) AND APPROPRIATE ASSESSMENT (AA)

Under Section 170A, the Board is the Competent Authority for the purposes of determining the Proposed Amendment.

Notwithstanding, any potential modifications to the Proposed Amendment arising from the submissions and as considered appropriate in the Planning Authority's Response, have been reviewed in the context of the Reports to Inform Screening for the SEA and AA processes in respect of the Proposed Amendment. See Section 9 below.

5. PLANNING AUTHORITY'S REPORT

Section 170A (8) of the Planning and Development Act, 2000, as amended, requires that:

"Not later than 8 weeks after giving notice under subsection (7), or such additional time as may be required to complete any assessment that may be required pursuant to subsection (6)(b) and agreed with the Board, the planning authority shall prepare a report on any submissions or observations received as a consequence of that notice and shall submit the report to the Board for its consideration."

Section 170A (9) requires that this Report shall :

- (a) *list the persons or bodies who made submissions or observations for the purposes of subsection (7)(iii),*
- (b) *summarise the issues raised in the submissions or observations so made,*
- (c) *include, where and if required for the purposes of subsection (6)(b), either or both—*
 - (i) *the environmental report and strategic environmental assessment, and*
 - (ii) *the Natura impact report and appropriate assessment, of the planning authority, and*
- (d) *give the response of the planning authority to the issues raised, taking account of the proper planning and sustainable development of the area, the overall objectives of the planning scheme, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.'*

This Planning Authority's Report thus takes cognisance of the above requirements with a list of the persons who made submissions, a summary of the issues and the Planning Authority's Response to the issues raised, having regard to the proper planning and sustainable development of the area, the overall objectives of the planning scheme, the statutory obligations of the local authority and any relevant policies or objectives of the Government or Minister of the Government.

6. STRUCTURE OF REPORT

To note that further suggested additions to the text of the proposed Amendment, as applicable, are identified through the use of **blue print**.

Suggested further/additional deletions to the text are identified through the use of **red print** with a bold strike-through, e.g. **red**.

7. SUMMARY OF ISSUES RAISED IN SUBMISSIONS RECEIVED FROM, OR OBSERVATIONS MADE BY, PRESCRIBED STATUTORY BODIES AND PLANNING AUTHORITY'S RESPONSE

Submissions received from the following Prescribed Statutory Bodies are summarised hereunder :

PRESCRIBED STATUTORY BODIES			
No.	Sub. Ref. No.	Name	Address &/ E-mail Address
2	STAT 01	EPA (Att. Cian O'Mahony, Scientific Officer, Strategic Environmental Assessment Unit)	c.omahony@epa.ie
4	STAT 02	Transport Infrastructure Ireland (Att. Rachel Begley, Regulatory & Administrative Executive)	Information@tii.ie
6	STAT 03	Department of Education (Att. Alan Hanlon, Statutory Plans, Forward Planning & Site Acquisitions Section)	Portlaoise Road Tullamore Co. Offaly R35 Y2N5 Alan_Hanlon@education.gov.ie
8	STAT 04	Minister Ryan, Department of Transport	Department of Transport Leeson Lane Dublin D02 TR60 Minister-Transport@corr.cloud.gov.ie
11	STAT 05	National Transport Authority (Att. Robert Parkinson, Land Use & Transport Planner, Strategic Planning Section)	Iveagh Court Harcourt Lane Dublin 2 D02 WT20 Robert.parkinson@nationaltransport.ie

STAT No.	Summary of Issues Raised or Observations Made	Planning Authority's Response
01	<p>Environmental Protection Agency (EPA)</p> <ul style="list-style-type: none"> The EPA provide a 'self-service approach' via their guidance document, '<i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>'. In any finalisation of a SEA Screening Determination, it is suggested this guidance document is taken into account, and any relevant recommendations incorporated into the proposed plan or programme. If a proposed determination has not been made regarding the plan or programme, a determination is required whether by implementing said, this would likely to have significant effects on the environment. In proposing and implementing the proposed plan or programme, one needs to ensure that said is : Consistent with the need for proper planning and sustainable development; That adequate and appropriate critical infrastructure is in place/required to be put in place; Is aligned with national commitments on climate change mitigation and adaption; Aligns with key relevant higher level plans and programmes; and is Consistent with the relevant objectives and policy commitments of the National Planning Framework and relevant Regional Spatial and Economic Strategy. Any proposed plan or programme also needs to comply with the requirements of the Habitats Directive where relevant. Where Appropriate Assessment is required, the key findings and recommendations should be incorporated into the SEA and the plan or programme. Requirements with regard to making any determination available for public inspection and circulation to the relevant environmental authorities, as required, is also set out/advised. 	<p>The Planning Authority notes the comments of the Environmental Protection Agency.</p> <p>Planning Authority's Opinion: No change to Proposed Amendment.</p>
02	<p>Transport Infrastructure Ireland (TII)</p> <ul style="list-style-type: none"> TII works closely with the National Transport Authority (NTA) and Dún Laoghaire Rathdown County Council in monitoring the implementation of the Cherrywood SDZ Planning Scheme. This activity promotes sustainable modal choice and addresses potential adverse impacts on the capacity, efficiency and safety of the national road network while ensuring the efficient operations of Luas to serve Dublin city and the development area. 	<p>The Planning Authority notes the comments of Transport Infrastructure Ireland, and also welcomes their confirmation and support of the proposed Amendment.</p> <p>Planning Authority's Opinion: No change to Proposed Amendment.</p>

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	<ul style="list-style-type: none"> • It is an investment priority of the National Development Plan and Spatial Planning and National Roads Guidelines for Planning Authorities (2012) to ensure that the extensive transport networks which have been greatly enhanced are maintained to a high level to ensure quality levels of service, accessibility, and connectivity to transport users. • TII seeks to ensure that these official national objectives are not undermined and that the anticipated benefits of the investment in the national road network are not jeopardised. The M50 and N/M11 are heavily trafficked and critical national transport. In addition, issues related to the safety and operation of the Luas must be considered. Therefore, the transport controls of the adopted Cherrywood SDZ planning scheme must be maintained. • TII has reviewed the proposed amendment and subject to maintaining the transport controls of the adopted planning scheme, this proposed amendment is appropriate and acceptable. 	
03	Department of Education	
	<ul style="list-style-type: none"> • The Department notes the proposed changes as per this Amendment and acknowledges the rationale for doing so. • It further notes the reduction in car park spaces as outlined in Table 4.4 which identifies the various reductions being applied to the different areas of the SDZ. Given the amount of residential units within the SDZ, these reductions could release a reasonable amount of land for alternative uses. • Clarification is sought with regard to what alternative uses are being proposed for these areas? 	<p>The Planning Authority notes the comments of the Department of Education and wishes to clarify as follows:</p> <p>With regard to the alternative uses being proposed for the areas 'released' as a result of reduced car parking requirements, surface level area/s should be re-utilised for sustainable / active travel measures or public realm improvements, including amenity space, landscaping and other public/communal realm enhancements. Decommissioned basement and under-croft parking should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures .</p> <p>Planning Authority's Opinion: No change to Proposed Amendment.</p>
04	Department of Transport	
	<ul style="list-style-type: none"> • The Department appreciates being notified of the proposed amendment to the approved Cherrywood SDZ Planning Scheme. • The content of the Amendment has been noted, and the Department has no further observations. 	<p>The Planning Authority notes the comments of the Department of Transport.</p>

STAT No.	Summary of Issues Raised or Observations Made	Planning Authority's Response
		Planning Authority's Opinion: No change to Proposed Amendment
05	<p>National Transport Authority (NTA)</p> <ul style="list-style-type: none"> The National Transport Authority (NTA) acknowledges receipt of the material related to proposed Amendment No.9 to the Cherrywood SDZ Planning Scheme, which sets out proposed revisions to the residential car parking standards in the SDZ Planning Scheme. The Cherrywood Development Agency Project Team liaised with the NTA in the preparation of the revised parking standards. The NTA has reviewed the proposed amendment and confirms that the Amendment accords with the outcomes of that process. The NTA is supportive of the proposed Amendment and looks forward to working closely with DLRCOCO and the other stakeholders to secure the timely delivery of the Cherrywood SDZ Planning Scheme. Regarding the proposed wording of the revised "Section 4.2.10 Car Parking Standards", the NTA wishes to clarify that the <i>Design Manual for Urban Roads and Streets</i> (DMURS) was prepared by the Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government, and is not an NTA publication. 	<p>The Planning Authority notes the comments of National Transport Authority, and also welcomes their confirmation and support of the proposed Amendment.</p> <p>It is acknowledged that the <i>Design Manual for Urban Roads and Streets</i> (DMURS) was prepared by the Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government, and is not an NTA publication. This detailing can be corrected in the text as follows:</p> <p>Planning Authority's Opinion: Minor Modification to Proposed Amendment.</p> <p>On page 2 of the proposed Amendment, 6th paragraph, change text to read as follows: ,</p> <p>From:</p> <p>All proposals relating to car parking will be required to prioritise the creation of a high-quality public realm in Cherrywood, including in terms of visual impact, amenity and safety consistent with the Planning Scheme, and NTA's Design Manual for Urban Roads and Streets (DMURS).</p> <p>To:</p> <p>All proposals relating to car parking will be required to prioritise the creation of a high-quality public realm in Cherrywood, including in terms of visual impact, amenity and safety consistent with the Planning Scheme, and NTA's the Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government's Design Manual for Urban Roads and Streets (DMURS).</p>

8. SUMMARY OF ISSUES RAISED IN THE SUBMISSIONS RECEIVED, OR OBSERVATIONS MADE, AND THE PLANNING AUTHORITY'S RESPONSE

Subm. No.	Summary of Issues Raised and/or Observations Made	Planning Authority' Response
DISAGREES WITH AMENDMENT SUBMISSION NUMBER 3		
3	<p>Disagrees with the Amendment</p> <ul style="list-style-type: none"> • Council must not reduce car infrastructure as it is the primary mode of transport, and is superior to other modes for accessibility and efficiency. • Public transport and cycling infrastructure is welcomed, but not at the expense of car infrastructure. 	<p>Response: This submission does not agree with the proposed Amendment.</p> <p>It is re-iterated that the main purpose for the proposed Amendment is to update the Cherrywood Planning Scheme.2014, as amended, to align and accord with changed and emerging national, regional and local policy context relating to car parking, and to promote sustainable public and active travel modes, and climate change mitigation measures.</p> <p>Current national and regional transportation strategy seeks to support an incremental change in travel behaviour in areas where there are existing alternatives to the car or will have more available choice when investments in infrastructure are fully realised over the next few years. It prioritises changes possible in our urban centres first where there is greater public transport, walking and cycling availability and opportunity. The strategy also recognises that the car will remain a transport mode of choice for many people for a variety of reasons. Tightened car parking standards as proposed under this proposed Amendment will serve to reduce motor vehicle traffic in Cherrywood. It is envisaged that the benefits of current and future Government investment and supports in public transport, walking, cycling and electric vehicles will be better realised with less motor vehicle traffic and levels of congestion, making public transport more reliable thereby encouraging people to use it, and making the environment for vulnerable road users, such as pedestrians and cyclists, safer, again encouraging people to use active travel, particularly for shorter journeys.</p> <p>The Amendment is intended to guide the provision of an appropriate level of car parking provision, including having regard also to the need to consider car ownership and usage trends, changes in travel behaviour, climate action, and emerging best practice in relation to car parking. In proposing to reduce the maximum residential car parking standards by way of this Amendment, cognisance is taken of proximity to public transport services, the ambitious modal split targets for sustainable transport modes as set in the Cherrywood Planning Scheme, and the potential for car sharing and other recent and emerging innovations in car parking.</p> <p>Planning Authority's Opinion: No change to Proposed Amendment.</p>

Subm. No.	Summary of Issues Raised and/or Observations Made	Planning Authority' Response
SUPPORTS AMENDMENT AND REDUCE CAR PARKING FURTHER SUBMISSION NUMBER 1		
1	<p>Supports Amendment, but seeks further reduction in standards, and supports for car-sharing.</p> <ul style="list-style-type: none"> • Supportive of reducing the maximum car parking standards. • Standards should be reduced further (does not specify to what extent). • Supports]increasing the number of spaces for car sharing. Submits that DLRCC should provide support for neighbourhood car sharing schemes through grants or procuring and supporting the necessary infrastructure, etc. 	<p>Response: The Planning Authority notes the content of the submission and welcomes the overall support.</p> <p>With regard to a further reduction in the maximum car parking standards, it is pertinent to emphasise that the standards as set out in Proposed Amendment have been formulated on the basis of a comprehensive review of policy and an evidence-based approach as set out in the <u>Background Technical Report 'Cherrywood Strategic Development Zone: Planning Advice Up-Date, April 2023'</u> as prepared by Aecom Consultants, commissioned by DLR as the Planning Authority and Development Agency, to inform the reduced standards as set out under this Proposed Amendment.</p> <p>The proposed car parking standards have been formulated having regard to the overall policy context at national, regional and local level, including inter alia, Project Ireland 2040; Government of Ireland Climate Action Plan; National Sustainability Plan; RSES-EMR; NTA's GDA Transport Strategy, Smarter Travel – A Sustainable Transport Future; as well as the then Consultation Paper on the Ministerial Guidelines 'Sustainable Residential Development and Compact Guidelines, and also the County Development Plan and SDZ Standards in the Dublin Area, at a local policy level.</p> <p>In addition, to a comprehensive policy review, the reduction in standards have been informed by the following considerations: County Development Plan / SDZ Review; Best-Practice Review; Planning Decisions; Car Ownership 2016; Travel Trends; Covid Research; and Cost of Living. Having regard to the evidence-based rationale, including best-practice and standards in comparable locations, the standards as per the Proposed Amendment are the result of a comprehensive evidence-based review and represent the findings and recommendations of the Aecom Background Technical Report.</p> <p>Furthermore, DLR commissioned an Addendum to the Technical Report, further to publication of the 'Sustainable Residential Development and Compact Guidelines, January 2024, as Ministerial Guidelines, to take cognisance of same, and to ascertain if any potential policy implications of the up-dated guidance with regard to the standards and other recommendations namely, the requirements for supporting infrastructure for active or sustainable travel. The Addendum Report sets out that SPPR3 (i) is applicable to Cherrywood as an urban neighbourhood, and as such that a car parking of 1 space per dwelling ratio applies to Cherrywood. Applying this</p>

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		<p>collectively on an area-basis, the analysis indicates that applying the maximum car parking standards as per the Proposed Amendment to undeveloped lands within the SDZ, that the overall rate of car parking would be below the maximum as set out in the Compact Settlement Guidelines (SDZ Undeveloped Lands Overall Rate 0.89 Spaces per unit on Average). (Please refer to attached <u>Addendum to Background Technical Report: Cherrywood Strategic Development Zone – Residential Parking Addendum Study, July 2024</u>).</p> <p>Accordingly, and having regard to the need to factors such as a lack of on-street parking in Cherrywood versus the legacy of street-or additional parking in existing built-up areas; the need to protect the public realm from over-spill parking and also the need to provide for an appropriate level of car storage to cater for all including the elderly and young families, DLR as the Planning Authority, does not consider it appropriate to further reduce the car parking standards.</p> <p><i>With regard to the suggestion that DLRCC should provide supports for neighbourhood car sharing schemes through grants or procuring and supporting the necessary infrastructure, the following is relevant:</i></p> <p>Dún Laoghaire-Rathdown County Council actively support car sharing by providing specific public car parking spaces throughout the County as a location for drop off and pick up of car sharing service vehicles, as well as ensuring those who use car sharing services can avail of free on-street parking in the Dún Laoghaire-Rathdown County Council area. Additionally, with reference to the National Sustainable Mobility Policy Action Plan, 2022-2025, Government intend to introduce numerous “mobility hubs” across the country in areas close to existing public transport links from later this year. This scheme is to be administered by Local Authorities to encourage people to share access to e-bikes and electric vehicles and will support efforts to curb transport emissions by reducing the number of the cars on the road.</p> <p>Planning Authority’s Opinion: No change to the Proposed Amendment.</p>
SUPPORTS AMENDMENT SUBMISSION NUMBER 7		
7	Supports Amendment	<p>Response: The Planning Authority notes the contents and welcomes the support set out in the submission.</p>

Subm. No.	Summary of Issues Raised and/or Observations Made	Planning Authority' Response
	<ul style="list-style-type: none"> Fully supportive of this Amendment, as many of the proposed developments in the Cherrywood SDZ have too much car parking and not enough bike parking. This Amendment will help to change this for new developments, and this is very important for the area and for local residents. 	<p>Planning Authority's Opinion: No change to the Proposed Amendment.</p>
<p>SUPPORTIVE OF AMENDMENT, BAR PART OF THE TEXT RELATED TO FUTURE RE-PURPOSING OF CAR PARKING SPACES SUBMISSION NUMBERS 5 and 9</p>		
<p>5</p>	<p>Supportive of Proposed Amendment</p> <ul style="list-style-type: none"> The submitter welcomes the proposed Amendment (No. 9) to bring the parking standards in the Cherrywood SDZ Planning Scheme into line with national policy, and is satisfied that reduced residential car parking are appropriate for Cherrywood Town Centre given its highly accessible location and high-quality public transport infrastructure. Specific Objective PI21 and Table 4.4 are acceptable and represent a suitable adjustment to the existing objective and standards. <p><u>Notwithstanding.</u> Concern regarding the part of the text insertion related to Future Re-purposing of Car Parking</p> <ul style="list-style-type: none"> With regard to the text, '<i>Decommissioned basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures.</i>', this is acceptable. However, to make it workable, it should be stated that any such floorspace created be excluded from the floorspace allocations applicable to the plot in question. 	<p>Response:</p> <p>The Planning Authority welcomes the support for the proposed Amendment (No. 9) to bring the parking standards in the Cherrywood SDZ Planning Scheme into line with national policy.</p> <p>This submission identifies a concern regarding part of the text insertion related to Future Re-purposing of Car Parking, in that stated floorspace created by decommissioned basement and undercroft parking space, should be excluded from the floorspace allocations applicable to the plot in question.</p> <p>The Planning Authority acknowledges and generally accepts this point, having regard to the merit in re-purposing former car spaces and utilisation of basement or under-croft space for supporting infrastructure for active travel, communal uses and / or uses appropriate for basement level, that may not otherwise be suitable for above ground, subject to otherwise meeting the requirements of the Planning Scheme objectives and proper planning and sustainable development. In this regard, a caveat could be included in association with this sentence.</p> <p>Planning Authority's Opinion: Minor modification to Proposed Amendment:</p> <p>On page 2,</p> <p>From: Future Repurposing of Car Parking Spaces</p> <p>Proposals for retrospective repurposing of existing or permitted car parking spaces will be expected to maximise basement car parking and minimise surface level / under-croft parking. Surface level spaces should be re-utilised for sustainable/active travel measures or public realm improvements, including amenity space, landscaping</p>

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		<p>and other public / communal realm enhancements. Decommissioned basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures.</p> <p>To: Proposals for retrospective repurposing of existing or permitted car parking spaces will be expected to maximise basement car parking and minimise surface level / under-croft parking. Surface level spaces should be re-utilised for sustainable/active travel measures or public realm improvements, including amenity space, landscaping and other public / communal realm enhancements. Decommissioned basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures. In such instances, floorspace created by decommissioned basement and/or under-croft parking will be excluded from the gross floor area calculations applicable to the subject plot, unless otherwise specified and subject to meeting the requirements of the Planning Scheme Objectives and generally in accordance with proper planning and sustainable development of the area.</p> <p>Please Refer also to Submission No. 9.</p>
9	<p>Supportive of Proposed Amendment</p> <ul style="list-style-type: none"> The Submitter welcomes the proposed amendment to the Cherrywood Planning Scheme which provides reduced residential car parking standards, with an increased emphasis on supporting sustainable modes of travel. The proposed amendment appears consistent with the recently published "Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)". <p><u>Notwithstanding,</u></p> <p>a) Concern regarding the part of the text insertion related to Future Re-purposing of Car Parking</p> <ul style="list-style-type: none"> The proposed amendment details an expectation to maximise basement car parking and minimise the use of surface level / undercroft parking. It is considered that this contradicts national, regional and local policies focused on 	<p>Response: The Planning Authority welcomes the support for the proposed Amendment in order to provide reduced residential car parking standards, with an increased emphasis on supporting sustainable modes of travel.</p> <p>This submission then refers to a concern regarding part of the text insertion related to the future re-purposing of car parking, and to amendments to permitted development being utilised for alternative uses.</p> <p>a) The concerns are acknowledged and are considered valid to a certain extent. It was never / nor is the Planning Authority's intention to seek the build-out of an over-sized basement, in the event that a permitted development has not yet been implemented, and there is the potential for basement reduction with the reduced parking standards. The reference to 'or permitted' refers to the potential for amendment applications in instances of an already constructed or</p>

Subm. No.	Summary of Issues Raised and/or Observations Made	Planning Authority' Response
	<p>addressing the climate crisis where significant embodied carbon is expended building basements.</p> <ul style="list-style-type: none"> • Protection of the public realm is an important objective and it is considered that is already covered in the proposed Amendment as follows, 'All proposals relating to car parking will be required to prioritise the creation of a high-quality public realm in Cherrywood, including in terms of visual impact, amenity and safety consistent with the Planning Scheme, and NTA's Design Manual for Urban Roads and Streets (DMURS).' Linking the reduction of basement parking to public realm design this way is unnecessary and cumbersome. • The reduction of basements and the design of public realm should be considered on their own merits based on good design principles. • It is suggested that the following paragraph should be deleted: <i>"Future Repurposing of Car Parking Spaces Proposals for retrospective repurposing of existing or permitted car parking spaces will be expected to maximise basement car parking and minimise surface level / under-croft parking. Surface level spaces should be re-utilised for sustainable/active travel measures or public realm improvements, including amenity space, landscaping and other public / communal realm enhancements."</i> <p>b) Concern regarding the text insertion related to amendments to permitted development being utilised for alternative uses.</p> <ul style="list-style-type: none"> • In addition, the Amendment suggests that amendments to permitted developments should be to re-utilise space for alternative uses. It is illogical to suggest that permitted car parking spaces that are no longer required should still be built, but repurposed. Where permitted but unbuilt car spaces will become surplus to requirements as a result of this Amendment. The option should be available to reduce costly and carbon intensive basement areas rather than just repurpose. It is suggested that the following paragraph should be amended <u>as follows</u>: <i>"Decommissioned existing basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or uses related to the</i> 	<p>part-constructed basement. It is accepted that the inclusion of these words text may indicate otherwise, and as it is recommended to omit the text 'or permitted' from Para 8, Page 2 as set out below. However, it is not considered necessary or appropriate to omit this paragraph in its entirety, as it sets out guidance and relevant considerations for the future re-purposing of car spaces that may in the future become obsolete (for non-residential uses, as well as residential developments).</p> <p>Planning Authority's Opinion: Minor modification to proposed Amendment: Please Refer also to Submission No. 5 Above</p> <p>b) As per above, it was not / nor is the Planning Authority's intention to seek the build-out of a basement scaled for the current car parking standards, where not constructed or the relevant permissions implemented. It is considered appropriate to address any possible confusion by omission of the following text 'or the amendment of such permitted developments' from the paragraph as requested by the submission. In the opinion of the Planning Authority, all other text should be retained.</p> <p>The Planning authority considers it appropriate to amend text as follows:</p> <p>Planning Authority's Opinion: Minor Modification to Proposed Amendment</p> <p>From: Decommissioned basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or</p>

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	<p><i>primary land-use, resident facilities or appropriate sustainable / active travel measures."</i></p>	<p>uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures.</p> <p>To: Decommissioned basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures.</p>
<p>SUPPORTIVE OF AMENDMENT, BAR 'USEAGE CHARGE' FOR RESIDENTIAL CAR PARKING SUBMISSION NUMBER 5</p>		
<p>5</p>	<p>Concern regarding the part of the text insertion related to 'Useage Charge' for Residential Car Parking.</p> <ul style="list-style-type: none"> Table 4.4, Note 2 requires that car parking spaces for 1 and 2 bed units shall be unallocated and with a usage charge applying to each space and all other car parking shall be allocated with no usage charge. Access to car parking for any apartment scheme in the Cherrywood Town Centre will be managed in accordance with a car parking management strategy to be under a private Management Company. A 'useage charge' is considered to be very prescriptive and could cause problems in practice. It is suggested that Note 2, Table 4.4, should be amended to remove the absolute provisions regarding the allocation and usage charges as they apply to various types of units and these matters should be addressed at planning application stage in the context of a submitted site-specific Car Parking Management Plan. Changes sought to the text are as follows, NOTE 2: Car parking spaces for 1 and 2 bed dwelling units, and dwelling units in Town and/or Village Centres shall be unallocated and with a usage charge applying to each space. All other car parking shall be allocated, with no usage charge. Developers will have sole responsibility for appointing a management company to manage and enforce areas of parking designated for visitor use or for residents in studio, 1 and 2 bed units. Plans for car parking management and enforcement must be clearly outlined in full within submitted planning applications to ensure that the 	<p>Response: This submission refers to a concern regarding part of the text insertion related to 'Useage Charge' for Residential Car Parking.</p> <p>Parking has a significant influence on people's travel behaviour with a long-established link between reliable public transport availability and parking supply. The availability and price of parking are major determinants of the relative attractiveness of the private car versus sustainable transport options. Parking management measures such as the usage charge proposed under this Amendment are intended to make private car use more expensive and less convenient for residents, thereby increasing the relative attractiveness of non-car modes to travel to key destinations both within and outside of Cherrywood.</p> <p>Parking Measures including usage charging and limiting parking supply therefore have a considerable role to play in influencing people's travel decisions and can assist in meeting various National policy objectives such as those outlined in The Climate Action Plan 2023 (CAP23), The Department of Transport's "Moving Together" strategy, The NTA's Transport Strategy for the Greater Dublin Area, 2022-2042, and the DHLGH's "Sustainable Residential Development and Compact Settlement Guidelines, 2024. It is noted, that the National Climate Action Plan 23 (CAP 23) was draft at the time if preparing the Proposed Amendment and subsequently came into effect in December 2023.</p> <p>Transport demand management through parking restraints such as the usage charge proposed in this Amendment are best targeted to locations such as Cherrywood where accessibility by alternative modes is high thereby encouraging mode shift to public transport, walking and cycling.</p>

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	<p><i>surrounding public realm is not affected by nuisance / overspill parking.</i></p>	<p>The concerns are acknowledged and are considered to have certain merit. It is considered that minor modifications to the text concerning allocation of spaces and usage charging can be made to introduce additional flexibility to the administration of parking allocation and parking demand management measures by Developers' management companies for apartment, duplex or triplex units. Additionally, houses are to be distinguished to ensure that houses are allocated a minimum of one car parking space.</p> <p>Planning Authority's Opinion: Minor Modification to Proposed Amendment</p> <p>On page 3, under Table 4.4</p> <p>From: <i>NOTE 2: Car parking spaces for 1 and 2 bed dwelling units, and dwelling units in Town and/or Village Centres shall be unallocated and with a usage charge applying to each space. All other car parking shall be allocated, with no usage charge. Developers will have sole responsibility for appointing a management company to manage and enforce areas of parking designated for visitor use or for residents in studio, 1- and 2- bed units. Plans for car parking management and enforcement must be clearly outlined in full within submitted planning applications to ensure that the surrounding public realm is not affected by nuisance / overspill parking.</i></p> <p>To: <i>NOTE 2: A minimum of 1 car parking space shall be allocated to 2 bed and 3 or more bed houses. Car parking spaces for 1 and 2 bed dwelling bed units, 2 bed units, 3 or more bed units, and all dwelling units in Town and/or Village Centres shall not be unallocated allocated to units. and with a usage charge applying to each space. All other car parking shall be allocated, with no usage charge. Developers will have sole responsibility for appointing a management company to appropriately manage residential car parking for these units and to administer car parking demand management measures including a usage charge or otherwise, as well as manage and enforce areas of parking designated for visitor use. or for residents in studio, 1 and 2 bed units. Detailed plans for car parking management and enforcement must be clearly outlined in full within submitted planning applications to ensure that the surrounding public realm is not affected by nuisance / overspill parking.</i></p>
<p>PROPOSALS FOR PARKING AT RATIOS LOWER THAN THE STATED MAXIMUM IN EXCEPTIONAL CIRCUMSTANCES SUBMISSIONS NUMBERS 5, 9, and 10</p>		
<p>5</p>	<p>Concern regarding the text insertion related to Additional External Infrastructure Provision</p> <ul style="list-style-type: none"> Page 3, Last Paragraph, states that parking at a ratio of less than 0.5 spaces per unit will only be acceptable 'in exceptional circumstances'. Where a ratio of less than 0.5 spaces per unit is proposed developers/ applicant will be 	<p>Response:</p> <p>This submission refers to a concern regarding the text insertion related to Additional External Infrastructure Provision, and seeks to delete a substantial component of the text.</p>

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	<p>required to provide "additional transport infrastructure and/or demand management measures", such as regional mobility hubs, strategic active travel and public transport infrastructure and smart parking measures.</p> <ul style="list-style-type: none"> • It is considered that these are significant additional and unquantified infrastructure elements that are outside the control of landowners. • It is requested that the following amendments to the proposed text are made : 'The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may only do so upon evidence-based demonstration of exceptional circumstances. This will be dependent on the level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals; and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as: Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the Planning Authority may consult with NTA, TII and other relevant stakeholders. <p>Early engagement with DLRC as the Development Agency will be an essential prerequisite in this regard. The Development Agency Project Team will work with applicants to explore viable proposals that accord with the overall objectives of the Planning Scheme. To enable provision of car parking below the stated maximum developers must provide a detailed submission outlining all aspects of the existing and proposed sustainable transport infrastructure and management proposals to enable Cherrywood to enforce</p> 	<p>With reference to the Technical Report by Aecom (May 2023), the tightened residential car parking standards in Table 4.4 as set out in the proposed Amendment have been determined following comprehensive, evidence based assessment. As part of Aecom's assessment works, the following National and local policies, as well as best practice reviews, were given due consideration and informed the amended residential car parking ratios proposed:</p> <ul style="list-style-type: none"> • Project Ireland 2040 – National Planning Framework • Project Ireland 2040 – National Sustainable Mobility Policy • Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region (2019-2031) • Smarter Travel – As Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020 • DLRC Climate Change Action Plan 2019-2024 (it is noted that DLRC's Climate Change Action Plan has since been updated) • National Transport Authority - Greater Dublin Area Transport Strategy 2022-2042 • Official Policy Related to the Strategic National Road Network • Sustainable and Compact Settlements Guidelines for Planning Authorities – Consultation Paper 2023 • The County Development Plan and SDZ Standards in the Dublin Area • Planning Decisions; Car Ownership 2016; Travel Trends; Covid Research; Cost of Living; and standards in comparable locations. <p>Following the publication of the "Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities" (January 2024), DLR commissioned Aecom to undertake an addendum to their Technical Report of May 2023. The Addendum Report sets out that SPPR3 (i) is applicable to Cherrywood as an urban neighbourhood, and as such that a car parking of maximum 1 space per dwelling ratio applies to Cherrywood. Applying this collectively on an area-basis, the analysis indicates that applying the maximum car parking standards as per the Proposed Amendment to undeveloped lands within the SDZ, that the overall rate of car parking would be below the maximum as set out in the Compact Settlement Guidelines (SDZ Undeveloped Lands Overall Rate 0.89 Spaces per unit on Average). (Please refer to Appendix A for "Addendum to Background Technical Report: Cherrywood Strategic Development Zone – Residential Parking Addendum Study, July 2024").</p> <p>The assessment of reduced car parking standards, as outlined in Aecom's Technical Report of May 2023, concludes that it will be essential for developers to commit to</p>

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	<p>change and provide realistic options for residents. Sustainable infrastructure and/or services and demand management measures may be strategically important and also interdependent and may require collective delivery between numerous stakeholders, including DLRCC, the NTA and TII, and as such will be subject to consultation with stakeholders in order to determine potential locations, programme, management responsibility and cost implications. It shall be noted that for any reduced residential parking provision, proposals that are reliant on sustainable infrastructure and/or services and demand management measures, the onus shall be on applicants to demonstrate certainty of delivery of this infrastructure and/or services, and there shall be no additional responsibility or requirement placed upon the NTA, TII or the Local Authority for early delivery of such infrastructure in order for applicants to avail of reduced parking provision.'</p>	<p>providing and/or contributing to infrastructure provision and demand management tools such as implementation of Travel Plans; parking enforcement measures; provision of bike hire facilities; commitment to regularly monitoring car parking levels etc., as part of the planning application process to support the reduced parking standards and to ensure residents are provided with alternative transport options to the private car. It is further considered in the assessment that no further reduction to the proposed maximum standards as outlined in Table 4.4 should typically be permitted in order to allow the Planning Authority to appropriately monitor and manage the impacts of the revised lower parking standards, noting the objectives of the Planning Scheme and DMURS to protect public realm, in tandem with delivery of sustainable and active travel infrastructure and public transport services in Cherrywood.</p> <p>However, it is accepted that there may be instances where it can be comprehensively demonstrated by a developer, and subsequently accepted by the Planning Authority, that there is a specific requirement for a lower number of residential car parking spaces than that prescribed under Table 4.4 for a particular Cherrywood development.</p> <p>As such, the proposed Amendment allows for such exceptional circumstances arising provided that such development proposals with a lower number of residential car parking than that prescribed under Table 4.4 are supported by demonstrable benefits for the SDZ or wider strategic initiatives such as provision of large-scale mobility hubs, neighbourhood parking facilities, etc. Applications in this regard, i.e. proposed as being under exceptional circumstances, will be considered on a case-by-case basis, on the basis of the evidence presented, and may also be subject to consultation with the NTA and TII if considered as strategically important. Landowner/Developer collaboration/cooperation and/or collective delivery between numerous stakeholders may be required in such instances, and as such will be subject to consultation with relevant stakeholders in order to determine potential locations, programme, management responsibility and cost implications. Early pre planning engagement with the Planning Authority will be a prerequisite for all applications that are advocated as being under exceptional circumstances.</p> <p>It is therefore considered that the text regarding exceptional circumstances and requirements under exceptional circumstances to provide additional transport infrastructure and/ or demand management measures will not be omitted as requested. However, it is also considered that minor modifications to the supporting text can be made to provide an additional level of flexibility.</p>

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		<p>Planning Authority's Opinion: Minor Modification to Proposed Amendment</p> <p>Refer to Submission No. 10 below.</p>
9	<p>Concern regarding the text insertion related to Additional External Infrastructure Provision</p> <ul style="list-style-type: none"> • The draft Amendment proposes parking at ratios lower than the stated maximum may be warranted in exceptional circumstances. This is welcomed. However, the measures proposed to demonstrate 'exceptional circumstances' extend to delivery of transport/infrastructure that is a matter for public transport providers rather than private developers. • It is suggested that any proposals for parking at less than the stated maximum ratios should be considered on a case by case basis and based on enhancements that are pragmatic and deliverable by individual applicants. • It is requested that the last paragraph on page 3 and first paragraph of page 4 should be deleted <u>as follows</u>: <i>"The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may only do so upon evidence-based demonstration of exceptional circumstances. This will be dependent on the level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals; and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as: Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the</i> 	<p>Response:</p> <p>This submission refers to a concern regarding the text insertion related to Additional External Infrastructure Provision and seeks to delete a substantial component of the text.</p> <p>See Planning Authority Response for Submission No. 5 above.</p> <p>Planning Authority's Opinion: Minor Modification to Proposed Amendment</p> <p>Refer to Submission No. 10 below for Modification Text.</p>

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	<p>Planning Authority may consult with NTA, TII and other relevant stakeholders.</p> <p>Early engagement with DLRCC as the Development Agency will be an essential prerequisite in this regard. The Development Agency Project Team will work with applicants to explore viable proposals that accord with the overall objectives of the Planning Scheme. To enable provision of car parking below the stated maximum developers must provide a detailed submission outlining all aspects of the existing and proposed sustainable transport infrastructure and management proposals to enable Cherrywood to enforce change and provide realistic options for residents. Sustainable infrastructure and/or services and demand management measures may be strategically important and also interdependent and may require collective delivery between numerous stakeholders, including DLRCC, the NTA and TII, and as such will be subject to consultation with stakeholders in order to determine potential locations, programme, management responsibility and cost implications. It shall be noted that for any reduced residential parking provision, proposals that are reliant on sustainable infrastructure and/or services and demand management measures, the onus shall be on applicants to demonstrate certainty of delivery of this infrastructure and/or services, and there shall be no additional responsibility or requirement placed upon the NTA, TII or the Local Authority for early delivery of such infrastructure in order for applicants to avail of reduced parking provision."</p>	
10	<p>Concern regarding the text insertion related to Additional External Infrastructure Provision</p> <ul style="list-style-type: none"> There is concern related to the supporting text associated with the revised standards which states that reduced car parking below the maximum standards, may only be provided upon "evidence-based demonstration of exceptional circumstances". This blanket approach effectively sets the default parking rate at the absolute maximum. This is considered overly restrictive, and does not allow for sufficient flexibility to provide for reduced car usage and the continued move toward more sustainable methods of transport. A more flexible approach to reduced car parking standards is supported by national policy documents, particularly at locations that have good access to urban services and to public transport, such as the Planning Scheme area. 	<p>Response: This submission refers to a concern regarding the text insertion related to Additional External Infrastructure Provision and seeks to modify the text.</p> <p>See Planning Authority Response for Submission No. 5 above.</p> <p>Planning Authority's Opinion: Minor Modification to Proposed Amendment</p> <p>On page 4, From: The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may</p>

Subm. No.	Summary of Issues Raised and/or Observations Made	Planning Authority' Response
	<p>Documents/extracts cited include :</p> <ul style="list-style-type: none"> ➤ The Sustainable Urban Housing: Design Standards for New Apartments (2023) state (paragraph 4.20); ➤ The existing and planned high frequency bus services (including the planned BusConnects proposals, of which the application for Bray to City Centre Core Bus Corridor Scheme is currently being considered by the Board); ➤ Greater Dublin Area Transport Strategy, 2022-2042, which recommends incorporation of a maximum residential parking standard (Measure TM12); ➤ The Greater Dublin Area Transport Strategy 2022-2042 which recommends incorporation of a maximum residential parking standard (Measure TM12); ➤ The National Planning Framework includes National Policy Objective 13 which outlines that planning standards should be flexibly applied in response to well-designed development proposals in order to deliver on compact growth objectives; and ➤ The Sustainable Residential Development and Compact Settlement Guidelines (published in January 2024). Whilst these may be the subject of a future amendment to the Planning Scheme, SPPR4 – Car Parking also re-emphasises the need for reduced car parking provision in accessible locations, and requires a rationale and justification for the number of car parking spaces, <i>"particularly when they are close to the maximum provision"</i> (rather than where proposing a reduction below the maximum quantum allowable). <ul style="list-style-type: none"> • It is considered that depending on the nature and scale of the developments, it would not be appropriate for all developments to demonstrate 'exceptional circumstances' and 'commit' to providing additional infrastructure, or 'complement strategic infrastructure proposals', where a reduction below the maximum standard is sought. • Set out below are suggested minor amendments to the supporting text to provide for more flexibility and ensure it does not lead to difficulties for any future development 	<p>only do so upon evidence-based demonstration of exceptional circumstances. This will be dependent on the level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals; and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as: Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the Planning Authority may consult with NTA, TII and other relevant stakeholders.</p> <p>To:</p> <p>The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may only do so upon evidence-based demonstration of exceptional circumstances and where the following criteria can be met, or similar in terms of being strategic in nature and impact. This will be dependent on the level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals; and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as, but not limited to: Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the Planning Authority may consult with NTA, TII and other relevant stakeholders.</p>

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	<p>where it does not fully adhere to the exact quantum of car parking required.</p> <p>Amended/additional text in green, omitted text shown in red with a strikethrough) for revisions of the supporting text to Table 4.4 :</p> <p><i>The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may only do so upon an evidence-based <i>rationale and justification demonstration of exceptional circumstances</i>. This will be dependent on the <i>nature of the proposed development and the</i> level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals (<i>where relevant</i>); and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit, <i>where appropriate</i>, to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as, <i>but not limited to</i>: Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals, <i>where appropriate</i>, significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the Planning Authority may consult with NTA, TII and other relevant stakeholders.</i></p> <p><i>Early engagement with DLRCC as the Development Agency will be an essential prerequisite in this regard. The Development Agency Project Team will work with applicants to explore viable proposals that accord with the overall objectives of the Planning Scheme. To enable provision of car parking below the stated maximum developers must provide a detailed submission outlining all aspects of the existing and proposed sustainable transport infrastructure and management proposals to enable Cherrywood to enforce change and provide realistic options for residents. Depending on</i></p>	

Subm. No.	Summary of Issues Raised and/or Observations Made	Planning Authority' Response
	<p><i>the nature of the proposal, sustainable infrastructure and/or services and demand management measures may be strategically important, and also interdependent and may require collective delivery between numerous stakeholders, including DLRCC, the NTA and TII, and as such will be subject to consultation with stakeholders in order to determine potential locations, programme, management responsibility and cost implications. It shall be noted that for any reduced residential parking provision, proposals that are reliant on sustainable infrastructure and/or services and demand management measures, the onus shall be on applicants to demonstrate certainty of delivery of this infrastructure and/or services, and there shall be no additional responsibility or requirement placed upon the NTA, TII or the Local Authority for early delivery of such infrastructure in order for applicants to avail of reduced parking provision.</i></p> <p>The Submitter (Submission No. 10) does though welcome in principle the proposed overall reduction in the residential parking requirements, and the change from minimum to maximum parking standards set out in Table 4.4 of the Proposed Amendment.</p>	

9. SEA AND AA SCREENING REVIEW OF PLANNING AUTHORITY'S RESPONSE AND PROPOSED MINOR MODIFICATIONS, AND CONCLUDING SEA AND AA STATEMENTS

SEA:

There is a need to establish whether or not significant environmental effects would be likely to arise from any Planning Authority's Opinion with regard to the proposed modifications. (In any case whereby significant environmental effects are identified as being likely, full SEA would need to be undertaken)

A review of the proposed modifications as set out in the Planning Authority's Response to the submissions, has been undertaken. It is concluded that the proposed modifications as arising from the submissions would not change the conclusion of the previously submitted Report to inform the SEA Screening for the Proposed Amendment, that the Proposed Amendment would not be likely to result in significant environmental effects. Since this is the outcome, full SEA remains unnecessary for Proposed Amendment No. 9 with/without the Planning Authority's proposed modifications.

AA:

There is a need to establish whether or not any Planning Authority's proposed modifications would give rise to any effect on any European site. (In any case whereby a likely significant effect on any European site is identified, Stage 2 AA would need to be undertaken).

A review of the proposed minor modifications as set out in the Planning Authority's Response to the submissions, has been undertaken. It is concluded that the proposed modifications as arising from the submissions would not change the conclusion of the previously submitted Report to inform the AA Screening for the Proposed Amendment, that the Proposed Amendment will not give rise to any likely significant effect on any European site. Since this is the outcome, Stage 2 AA remains unnecessary for Proposed Amendment No. 9 with/without the proposed modifications as set out in the Planning Authority's Response.

10. PROPOSED MINOR MODIFICATIONS AS PER PLANNING AUTHORITY'S RESPONSE

This Report documents the public consultation process as required by the Board under Section 170A (7), held during the period of 31 May to 1 July 2024 inclusive, during which the proposed Amendment No. 9 (in full detail) and associated Reports to Inform Screening for SEA and AA were publicly available. Having now considered the content of all the submissions received within the statutory public consultation period made in relation to the proposed Amendment/s, the Planning Authority is of the opinion that while no significant further amendments are required to the proposed Amendment previously submitted for the Board's consideration, certain minor modifications or refinements of text are suggested. These are set out hereunder.

For ease of reference, the suggested modifications have been incorporated into the text of the Proposed Amendment, by way of track changes and colour font, so as to ensure they are easily identifiable.

Proposed Modification 1:

On page 2 of the proposed Amendment, 6th paragraph, change text,

From :

All proposals relating to car parking will be required to prioritise the creation of a high-

quality public realm in Cherrywood, including in terms of visual impact, amenity and safety consistent with the Planning Scheme, and NTA's Design Manual for Urban Roads and Streets (DMURS).

To :

All proposals relating to car parking will be required to prioritise the creation of a high-quality public realm in Cherrywood, including in terms of visual impact, amenity and safety consistent with the Planning Scheme, and ~~NTA's~~ the Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government's Design Manual for Urban Roads and Streets (DMURS).

Proposed Modifications 2-4:

On page 2, change text,

From:

Future Repurposing of Car Parking Spaces

Proposals for retrospective repurposing of existing or permitted car parking spaces will be expected to maximise basement car parking and minimise surface level / under-croft parking. Surface level spaces should be re-utilised for sustainable/active travel measures or public realm improvements, including amenity space, landscaping and other public / communal realm enhancements. Decommissioned basement and under-croft parking, or the amendment of such permitted developments, should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures.

To:

Future Repurposing of Car Parking Spaces

Proposals for retrospective repurposing of existing ~~or permitted~~ car parking spaces will be expected to maximise basement car parking and minimise surface level / under-croft parking. Surface level spaces should be re-utilised for sustainable/active travel measures or public realm improvements, including amenity space, landscaping and other public / communal realm enhancements. Decommissioned basement and under-croft parking, ~~or the amendment of such permitted developments,~~ should be re-utilised for communal, commercial, and / or uses related to the primary land-use, resident facilities or appropriate sustainable / active travel measures. In such instances, floorspace created by decommissioned basement and/or under-croft parking will be excluded from the gross floor area calculations applicable to the subject plot, unless otherwise specified and subject to meeting the requirements of the Planning Scheme Objectives and generally in accordance with proper planning and sustainable development.

Proposed Modification 5:

On page 3, under Table 4.4, change text,

From:

NOTE 2: Car parking spaces for 1 and 2 bed dwelling units, and dwelling units in Town and/or Village Centres shall be unallocated and with a usage charge applying to each space. All other car parking shall be allocated, with no usage charge. Developers will have sole responsibility for appointing a management company to manage and enforce areas of parking designated for visitor use or for residents in studio, 1- and 2- bed units. Plans for car parking management and enforcement must be clearly outlined in full within submitted planning applications to ensure that the surrounding public realm is not affected by nuisance / overspill parking.

To:

NOTE 2: *A minimum of 1 car parking space shall be allocated to 2 bed and 3 or more bed houses. Car parking spaces for 1 ~~and 2 bed dwelling~~ bed units, 2 bed units, 3 or more bed units, and all dwelling units in Town and/or Village Centres shall not be ~~unallocated~~ allocated to units. ~~and with a usage charge applying to each space. All other car parking shall be allocated, with no usage charge.~~ Developers will have sole responsibility for appointing a management company to appropriately manage residential car parking for these units and to administer car parking demand management measures including a usage charge or otherwise, as well as manage and enforce areas of parking designated for visitor use. ~~or for residents in studio, 1 and 2 bed units.~~ Detailed plans for car parking management and enforcement must be clearly outlined in full within submitted planning applications to ensure that the surrounding public realm is not affected by nuisance / overspill parking.*

Proposed Modification 6:

On page 4, change text,

From:

The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may only do so upon evidence-based demonstration of exceptional circumstances. This will be dependent on the level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals; and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as: Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the Planning Authority may consult with NTA, TII and other relevant stakeholders.

To:

The standards as set out in Table 4.4 above are maximum standards and shall apply as the residential car parking standards for all planning applications. There may be exceptional circumstances where a reduction in residential car parking provision below the stated maximum may be warranted. Developments seeking to avail of a reduced residential car parking provision below the maximum standards set out above, may only do so upon evidence-based demonstration of exceptional circumstances *and where the following criteria can be met, or similar in terms of being strategic in nature and impact.* This will be dependent on the level of sustainable infrastructure and/or services proposed; the potential for travel by active, public or sustainable modes; the extent to which proposals complement strategic infrastructure proposals; and implementation of demand management methods and solutions. To enable provision of car parking below the stated maximum, applicants/developers must commit to providing and/or contributing to additional infrastructure provision and/or demand management measures, such as, *but not limited to:* Regional Mobility Hubs; Strategic active travel / public transport link infrastructure or services; and comprehensive smart parking measures. An applicant's proposals shall demonstrate to the satisfaction of the Planning Authority that their proposals significantly and strategically advance and contribute to the social, economic and sustainable physical infrastructure within the Planning Scheme area. In this regard, the Planning Authority may consult with NTA, TII and other relevant stakeholders.

In conclusion, the Planning Authority looks forward to An Bord Pleanála's decision on this Proposed Amendment No. 9 of the Cherrywood Planning Scheme, 2014, as amended, in relation to Residential Car Parking Standards, Section 4.2.10 Car Parking Standards.

The Proposed Amendment is intended to update the Planning Scheme to align and accord with changed and emerging national, regional and local policy context relating to car parking, and to promote sustainable public and active travel modes, and climate change mitigation measures.

The Planning Authority would be pleased to provide any assistance to An Bord Pleanála, as may be required, to facilitate a timely decision.

Appendix A

Addendum to Background Technical Report

Residential Parking Study Addendum (Aecom, July 2024)