

SOCIAL HOUSING BUNDLE 4 DEVELOPMENT AT WELLMOUNT ROAD, FINGLAS.

TRAFFIC MOBILITY MANAGEMENT PLAN

DUBLIN CITY COUNCIL
July 2024

Project No: 23006

Contents Amendment Record



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Title: Social Housing Bungle 4	Title:	Social Housing Bundle 4
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Development at Wellmount Road Finglas / Traffic Mobility

Management Plan

Job Number: 23006

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Revision Record

Issue No.	Date	Description	Remark	Prepared	Checked	Approved
0	20.03.2024	Information	P1	KA	EK	РВ
1	15.04.2024	Information	P1	KA	ND	ND
2	18.04.2024	Information	P1	KA	ND	ND
3	01.07.2024	Information	P1	MG	DW	DW

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1 INTRODUCTION

1.1 Introduction

This report is prepared on behalf of Dublin City Council to accompany a Part 8 proposal for the construction of 77 apartment dwelling units at a site c.1.3 ha bound by Cardiffsbridge Road, Wellmount Road and Wellmount Drive, Finglas, Dublin 11, which will consist of the following:

- One apartment block with primary frontage onto Cardiffsbridge Road, ranging in height from 4 to 6-storeys, comprising 77 residential units (38 no. 1 bed units, 25 no. 2 bed units and 14 no. 3 bed units);
- 28 no. car parking spaces, 2 no. motorcycle spaces and 1 no. loading bay;
- 175 no. bicycle parking spaces;
- 135 sqm of internal community, arts and cultural floor space;
- 0.56 ha of public open space and 0.11 ha communal open space;
- Two vehicular accesses are proposed, one from Cardiffsbridge Road and one from Wellmount Road;
- Boundary treatments, public lighting, site drainage works, internal roads and footpaths, ESB substation, stores, bin and bicycle storage, plant rooms, landscaping; and
- All ancillary site services and development works above and below ground.

The purpose of this document is to define a Traffic Mobility Management Plan (TMMP) for the proposed development.

This TMMP has been prepared to guide the delivery and management of a package of integrated initiatives which seeks to encourage and embed sustainable travel choices by residents from the outset of the development's occupation.

A successfully implemented TMMP can provide reductions in car usage, particularly influencing levels of single-occupancy car travel, with increased trips made by car-sharing, public transport, walking and cycling, and can improve road safety and personal security for pedestrians and cyclists.

Mobility Management is concerned with improving the development site's access from the outset – by designing for and enabling and promoting sustainable travel options (e.g., walking, car-sharing, cycling and public transport) to residents – and by reducing the need to travel by car from the development to access essential services and amenities. TMMPs can also improve the health and wellbeing of residents through the benefits of active travel and reduce the transport-related carbon impact of the development. A TMMP specifically focuses on journeys made from a single origin (home) to multiple destinations.

1.2 Site Overview

The site is currently a greenfield site bounded on all sides by residential estates and a retail area with parking to the northwest of the site. The site is located in Finglas West, a northwestern outer suburb of Dublin. It lies close to Junction 5 of the M50 motorway and the N2 road. Nearby suburbs include Glasnevin approximately 3km to the east and

TMMP

Ballymun approximately 4.20km to the north. The main route serving the site includes R103 regional road running along the western boundary of the site. The R103 passes through Finglas, between Ballymun and Glasnevin, then passing Donnycarney before reach Howth Road.



Figure 1-1 – Site Location showing the indicative Site Boundary and Adjacent Developments



Figure 1-2 – Proposed Site Layout

1.3 Report Structure

This report sets out the background, context, and objectives of the plan, and describes a package of measures to promote and provide for the use of sustainable modes as an alternative to single occupancy car use to the development. A strategy for implementation, target setting and monitoring is also discussed. The report is set out in the following structure:

- Chapter 1: Introduction.
- Chapter 2: An introduction to the Mobility Management.
- Chapter 3: Planning Policy Context.
- Chapter 4: Baseline site transport review.
- Chapter 5: Traffic Impact.
- Chapter 6: Pre-occupation Baseline Mode Share.
- Chapter 7: TMMP Objectives and Targets.
- Chapter 8: TMMP Measures.
- Chapter 9: Monitoring and Review.

2 MOBILITY MANAGEMENT CONTEXT

2.1 What is Mobility Management

Mobility Management is a concept to promote sustainable transport and manage the demand for car use by changing travellers' attitudes and behaviours. Mobility Management is about improving a site's access, by designing for and enabling and promoting sustainable travel options (e.g., walking, cycling and public transport) to residents. The use of Mobility Management is well established in Ireland through the Development Control process and policy documents set out in Chapter 3. The process involves key stakeholders such as the Local Authority, public transport operators, the developer, and future residents.

2.2 The Benefits of Mobility Management

Implementing a TMMP has the following local benefits:

- Promoting alternative uses to the car can result in less congestion and therefore improves safety on local roads by promoting alternatives to the car.
- Reduced highway capacity problems can enable more sustainable travel choices.
- The local environment will be improved from reduced congestion, carbon emissions, pollution, and noise.
- A range of travel options makes the development site attractive to potential residents.
- Increases opportunities for active healthy travel, such as walking and cycling.
- Reduces demand for parking spaces, enabling land to be put to more cost-effective or commercially beneficial use and freeing space for active travel initiatives.
- Improved travel choice, quality, and affordable access to services for all users.

2.3 Mobility Management Plan Objectives

The overarching objectives of the TMMP are to reduce levels of private car use by encouraging people to walk, cycle, use public transport and car share. It can also reduce the number of lengths trips undertaken/ required.

The specific objectives of an TMMP can vary depending upon the organisation, site characteristics and specific land uses which vary with each site. Nevertheless, in the context of a residential TMMP, objectives can include:

Residents

- Address residents need for sustainable access to a full range of facilities for work, education, health, leisure, recreation, and shopping.
- Promote healthy lifestyles and sustainable, vibrant local communities by improving the environment and the routes available for cycling and walking.

The Local Community

- Make local streets less dangerous, less noisy and less polluted and enhance the viability of public transport.
- Reduce the traffic generated by the development for journeys both within the development and on the external road network.
- Promote equal opportunities by offering wider travel choices.
- Improve personal and wider community health.
- Reduce air and noise pollution.

2.4 Making Residential Mobility Management Plans Work

A successful TMMP will address all aspects of a development that create a need for travel by site residents. The TMMP 'pyramid' below demonstrates how successful plans are built on the firm foundations of location and site design. A TMMP should combine hard measures (e.g., cycle parking, routes to bus stops) and soft measures. All measures should be integrated into the design, marketing, and occupation of the site – with parking restraint often crucial to the success of the TMMP in reducing car use.



Figure 2-1– The Travel Plan Pyramid

TMMPs are evolutionary documents that should be regularly updated. In this way, TMMP targets and Action Plans can be reviewed and tailored to take account of ongoing changes in travel patterns. It is therefore intended that this TMMP is the starting point of a live process and will be updated when required by circumstances.

3 PLANNING POLICY CONTEXT

3.1 Planning Policy Overview

This section provides an overview of the national, regional, and local transport and other policy drivers and strategies that underpin the requirements and benefits of implementing a TMMP for the proposed residential development.

3.2 National Policy Context

This section provides an overview of the main national policy drivers and strategies that underpin the requirements and benefits of implementing a TMMP for a residential development at the Wellmount Road site.

Ireland 2040 Our Plan - National Planning Framework

The Project Ireland 2040 - National Planning Framework (NPF) recognises that improvements in connectivity are achievable and are necessary to boost competitiveness and quality of life. The Ireland 2040 vision include the following key elements which direct relevance to mobility management.

- i. More sustainable choices and options for people, businesses and communities that can positively influence sustainable patterns of living and working.
- ii. The highest possible quality of life for our people and communities, underpinned by high quality, well managed built and natural environments.
- Significant improvement in local and international connectivity that underpins that competitiveness and quality of life of our people, businesses, communities, and regions.

The NPF has been developed to deliver the following National Strategic Outcomes which are pertinent to this report. These are to:

- i. Improve accessibility to and between centres of mass and scale and provide better integration with their surrounding areas.
- ii. Ensure transition to more sustainable modes of travel (walking, cycling, public transport) and energy consumption (efficiency, renewables) within an urban context.

The NPF seeks to enable people to live closer to where they work, moving away from unsustainable trends of reduced community. It supports more energy efficient development through the location of housing and employment along public transport corridors, where people can choose to use less energy intensive public transport, rather than being dependent on the car.

3.3 Regional and Local Policy Context

This section provides an overview of the main regional and local policy drivers and strategies that underpin the context, requirements, and benefits of a TMMP for the proposed residential development.

Greater Dublin Area Transport Strategy, 2022 – 2042

This strategy aims to contribute to the economic, social, and cultural progresses of the Greater Dublin Area (GDA) by providing for the efficient, effective, and sustainable movement of people and goods – helping to reduce modal share of car-based communities to a maximum of 45%. To achieve these principles, future developments must:

- i. Have transport as a key consideration in land use planning integration of land use and transport to reduce the need to travel, reduce the distance travelled, reduce the time taken to travel, promote walking and cycling especially within development plans.
- ii. Protect the capacity of the strategic road network.
- iii. Ensure a significant reduction in share of trips taken by car, especially those trips which are shorter or commuter trips.
- iv. Consider all day travel demand from all groups.
- v. Provide alternate transport modes to reduce the strain on the M50 as current increase in traffic is unsustainable.

Dublin City Council are working with the NTA to bring forward additional and extended public transport routes to services newly developed and existing areas, to address gaps in existing areas to improve access to public transport stops and services and to improve the integration between high density development and public transport nodes.

BusConnects is the NTA's programme to greatly improve bus services. As part of the strategy, indicative radial and orbital core bus corridors were identified. The NTA has refined and altered the proposals across these corridors and have endeavoured to design a new bus system that is efficient and effective. Part of this scheme included the corridor of Finglas/Finglas North/The Ward to City Centre via Phibsboro. The F spine is located in the Finglas area and the F3 route passes the site.

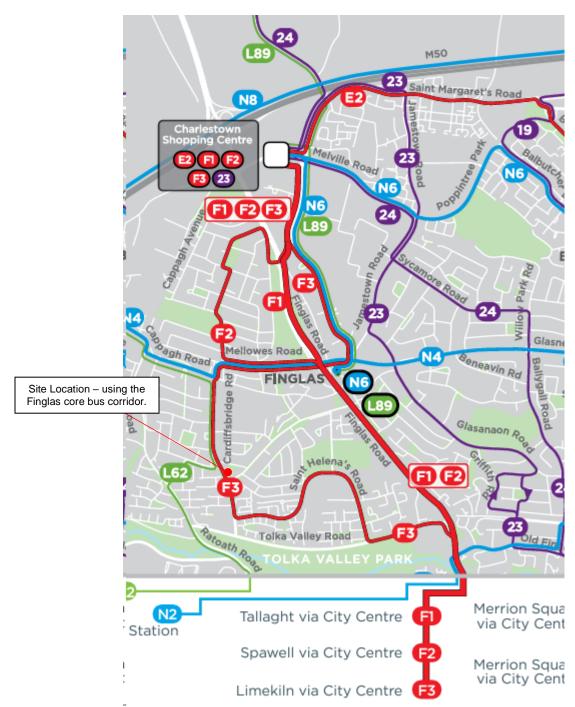


Figure 3-1 – BusConnects Dublin Core Bus Corridors (Source: GDA Transport Strategy 2022 – 2042)

Luas Finglas is the next proposed extension of the Luas Green Line, running from Broombridge to Charlestown through Tolka Valley and Finglas village.

A Luas stop located at Charlestown would be within an 8-minute cycle or a 15-minute bus journey from the development site.



Figure 3-2 – Proposed 2042 Light Rail Network (Source: GDA Transport Strategy 2022 – 2042)

Greater Dublin Area Cycle Network Plan, 2013

The Greater Dublin Area (GDA) Cycle Network Plan sets out a 10-year strategy plan to expand the urban cycle network from 500km to 2,840km. The overarching ambition of the scheme is to increase the number of commuters who commute by bike to the same amount of those commute by bus.

The network will consist of a series of primary, secondary, feeder and greenway routes. These routes will comprise of a mix of cycle tracks and lanes, cycleways, and infrastructure-free cycle routes in low traffic environment.

The proposed cycle network surrounding the development is shown below, with the following key radial routes into the City Centre are proposed to pass through the area:

 Route 3B: Route 3B is branch of Route 3. Route 3 is part of the two primary radial cycle routes in Dublin North Central that connect to the city centre with branches such as 3B. Route 3B starts along the Finglas Road, to Glasnevin, Finglas and Charlestown via Finglas Village, McKee Avenue and St. Margarets Road.

- **TMMP**
- Route NO4 and NO5 are part of the four orbital routes in Dublin North Central that
 provide cross links between the radial routes and gives access to destinations
 within this sector and in the adjoining North Central sector. Route NO4 starts along
 Collins Avenue from the coast at Clontarf via Killester, Donnycarney, Dublin City
 University, Ballymun and Finglas Village. Route NO5 is from the coast at Kilbarrack
 to Donaghmede, Coolock, Santry and Finglas.
- Route 4B: Route 4B is a branch of Route 4. Route 4 is part of the two primary radial cycle routes in Dublin Northwest that connect to the city centre with branches such as 4B. Route 4B starts to Finglas West via Ratoath Road.

The following greenway routes are proposed to avail of the natural corridors for a mix of amenity and commuter cycling:

- Tolka Greenway: River Tolka Greenway provides connection from the Royal Canal East of the M50 to Damastown via Waterville Park and Castle Curagh Park.
- Royal Canal Greenway: The Royal Canal Greenway starts from the city centre via Cabra, Ashtown, Castleknock, Coolmine and Clonsilla.



Figure 3-3 – Proposed Cycle Network Map

Dublin City Development Plan, 2022 – 2028

The DCDP provides a coherent, integrated framework to ensure the city develops in an inclusive and sustainable manner which is resilient on social, economic, and environmental fronts in the short and longer term. The plan emphasises the need for Dublin to become a low-carbon city and the role of compact, self-sustaining communities and neighbourhoods, urban form, and movement must play in achieving this goal.

The plan details a Core Strategy which includes housing, settlement, employment, retail, and public transport strategies. The strategy translates into 3 broad strands which form the basis for the policies and objectives outline in the plan. These are:

- Compact, quality, green, connected city.
- A prosperous, enterprising, creative city; and
- Creating sustainable neighbourhoods and communities

Table 3-1 below provides a summary of the policies and objectives most relevant to this TMMP.

Policy No.	Details
CEE13	Towards a Green and Circular Economy To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation.
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.
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.
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.

Deliev No.	Detaile
Policy No.	Details
SMT27	 Car Parking in Residential and Mixed Used Developments To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards to promote city centre living and reduce the requirement for car parking. 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.
SMT33	Design Manual for Urban Roads and Streets To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.
SMT34	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.
SMT35	Traffic Calming and Self-Regulation Street Environments To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.
SMTO34	Speed Limits and Traffic Calmed Areas To expand the 30kph speed limits and traffic calmed areas at appropriate locations throughout the city and subject to stakeholder consultation.

Table 3-1 - Extracts from most relevant DCDP 2022 - 2028 Policies

Volume 2, Section 4 of the DCDP sets out the car and cycle parking standards for proposed new development.

The Development Plan notes that reduced car parking provision may be acceptable where the Council is satisfied that good public transport links are already available or planned and/or a Mobility Management Plan for the development demonstrates that a high percentage of modal shift in favour of the sustainable modes will be achieved through the development.

4 BASELINE REVIEW OF EXISTING TRANSPORT NETWORK

4.1 Overview

This chapter discusses the existing transport network surrounding the site. A detailed commentary is provided on the existing walking, cycling and public transport facilities near the site.

4.2 Existing Pedestrian/ Cyclist Environment

The site is within a convenient walking distance to number of educational, residential, and medical and retail facilities.

- Dunnes Stores retail centre is within a less than 10-minute walk from the site.
- St. Brigid's Infant National School is within a 10-minute walk.
- St. Fergal's Boys National School and Coláiste Eoin are within a 15-minute walk.
- Clearwater Shopping Centre is within a 30-minute walk from the site. The shopping centre features a few commercial shops such as Tesco, Costa and FlyFit.
- Tolka Valley Park is within a 20-minute walk from the site.
- Cappagh Hospital is within a 30-minute walk.

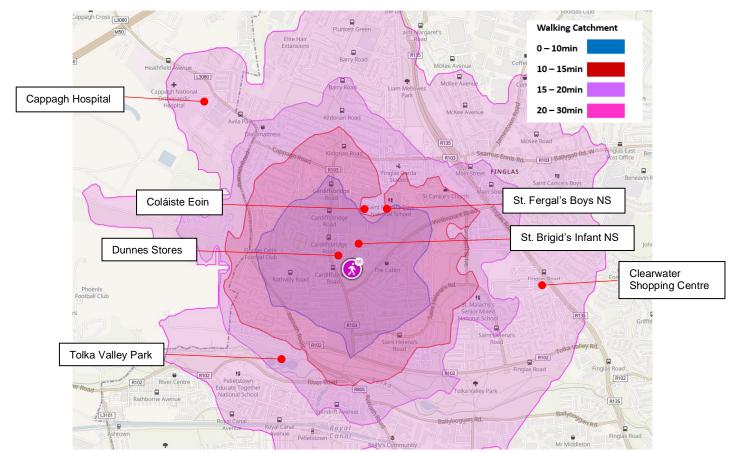
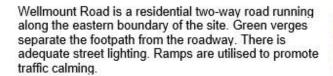


Figure 4-1 – Walking Catchment (Source: https://commutetimemap.com/map)





The R103 Regional (Cardiffsbridge) Road is a single-carriageway road located along the western boundary of the site. The road features wide footpaths on both sides of the road with a grass verge to separate pedestrians from the traffic. There is adequate street lighting. There is traffic signal-controlled pedestrian crossing, kerbs are dished and there is tactile paving at the crossing.

Figure 4-2 – Existing environment

The site is also highly accessible by cycling:

- Finglas is within a 10-minute cycle from the site.
- Cabra, Glasnevin and Ballymun are within 15-minute cycle.
- Castleknock, Oxmantown, Stoneybatter, Phibsborough, Drumcondra and Whitehall are within a 20-minute cycle.
- Blanchardstown, Chapelizod, The Liberties, North Wall, Donnycarney, Beaumont and Santry are within a 30-minute cycle.

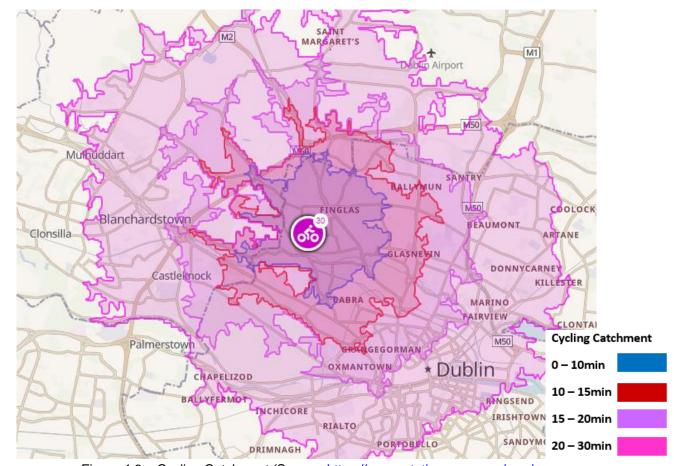


Figure 4-3 – Cycling Catchment (Source: https://commutetimemap.com/map)

There are cycle lanes provided most of the way on Finglas Road southbound, there are bus lanes on Finglas Road northbound as shown from the existing facilities map taken from the Greater Dublin Area Cycle Strategy as illustrated in Figure 4-4 below. 500m to the south of the site is the Tolka Valley Greenway.

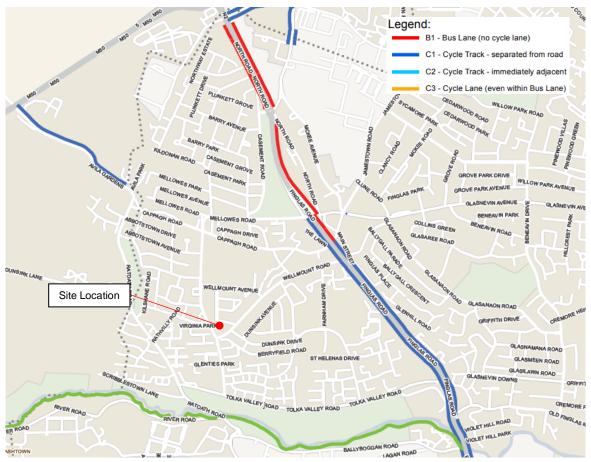


Figure 4-4 – Existing Cycle Network Map (Source: National Transport Authority)

TMMP

4.3 Public Transport Infrastructure

As graphically illustrated in Figure 4-5 below, the site is well situated to benefit from public bus connections with Table 4-1 detailing the number of services per day. The closest bus stops to the site are located at Cardiffsbridge Road which is just outside the development. These bus stops are operated by Dublin Bus and GoAhead Ireland.



Figure 4-5 – Bus Stops in the Vicinity of the Site (Source: <u>www.journeyplanner.transportforireland.ie</u>)

Operator	Route	Route	No. of services		
	No.		Monday to Friday	Saturday	Sunday
Dublin	40	Earlsfort Terrace – O'Connell	From 5:35 – 23:30	From 6:35 –	From 8:20 –
Bus		Street – Dorset Street – Finglas	service every 10	23:15 service	23:15 service
		Road – Charlestown SC	mins	every 15 mins	every 15 mins
	40E	Broombridge Luas – Cappagh	From 5:37 – 22:45	From 6:40 -	From 7:15 –
		Road – Tyrrelstown	service every 30	22:55 service	23:30 service
			mins	every 30 mins	every 30 mins
GoAhead	220	DCU – Ballymun – Jamestown	From 7:34 – 21:50	From 7:20 –	From 9:50 –
Ireland		Road – Finglas Road – Cappagh	service every 55	21:50 service	21:50 service
		Road - Blanchardstown SC -	mins	every 55 mins	every 55 mins
		Parslickstown Ave			

Table 4-1- Bus timetable

4.4 Other

On-site car parking is considered to be an inefficient use of space, particularly at a constrained location in a highly developed urban area such as the development site. Taking this into consideration, the provision of car club spaces is considered a more sustainable alternative which both reduces the need for car ownership and provision of dedicated car parking while also maintaining access to a vehicle for infrequent use.

There are 3 GoCar hire stations located within a 1km walk from the site. The locations of the GoCar bases are illustrated in Figure 4-6 with Table 4-2 providing additional details in relation to walking distance from the site and the type of GoCar vehicle available.

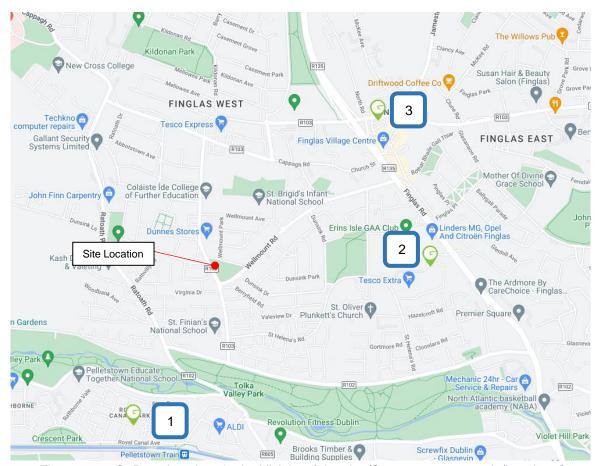


Figure 4-6 - GoBase locations in the Vicinity of the site (Source: www.gocar.ie/locations/)

GoCar members can book cars online or via the app for durations of as little as an hour. They then unlock the car with their phone or a GoCard; the keys are in the car; with fuel, insurance and city parking all included. The benefits of such car sharing services include:

- The reduction of cars on the road and therefore traffic congestion, noise, and air pollution.
- Frees up land traditionally used for private parking spaces.
- Encourages and potentially increases use of public transport, walking and cycling as the need for car ownership is reduced.
- Car share replaces approximately 20 private car parking spaces.

Reference No.	GoBase Locations	Vehicle Class/ Cars A	vailable	Approximate Distance from the Development
1	Pelletstown Avenue	GoTripper	GoExplore Auto	880m to southwest
2.	Tesco, Finglas	GoTripper GoCargo	GoExplore Auto	880m to east
3.	Finglas Main Street Car Park	GoCity		1.10km to the northeast

Table 4-2 – GoBase Details

5 TRAFFIC IMPACT

5.1 Construction Traffic Impact

Relative to the operational stage, the construction period will be temporary in nature. Construction traffic is only expected to consist of materials delivery and removal vehicles.

It is difficult to assess the exact quantum of traffic that will be generated during the construction period as it will vary throughout the construction process as different activities have different associated transportation needs. However, due to the nature of this development it can be assumed that there will be approximately 80 construction site staff at peak time, and it is expected that the site would generate approximately 30 vehicles during the morning and evening peak hours.

The number of HGVs generated during the construction phase will be evenly spread out throughout the day and in general will not coincide with peak commuter periods.

The following points are noted regarding to construction traffic:

- In general, the construction day will begin and end outside of peak travel hours. As a results, most workers travelling to and from the site will arrive before the a.m. peak hour and depart after the p.m. peak hour.
- On site parking will be prohibited due to the site constraints and to encourage staff to travel by numerous public options serving the area.
- Development of the proposed substructure and superstructure. This will include deliveries of machinery, steel rebar, brick, and concrete, roofing materials, and prefabricated element deliveries on HGVs.
- Material delivery vehicles travelling to and from the site will be spread across the course of the working day meaning the number of HGVs travelling during the peak hours will be relatively low.

Construction traffic associated with the construction of the proposed development will vary during the construction phase. The proposed sequencing of the construction of the proposed development is as follows:

- Initial set-up of the site, including security and construction compound.
- Identifying and locating above and below ground utilities and services at the site.
- Development of the proposed substructure and superstructure. This will include deliveries of machinery, steel rebar, brick, and concrete deliveries on HGV's.
- Internal finishing, including the mechanical and electrical fit out.
- External landscaping.

TMMP

Overall, it is expected that the level of traffic generated by the construction works will be negligible during the peak traffic hours, and as a result, it is expected to have negligible impact on the surrounding road network with respect to capacity.

5.2 Operational Stage

5.2.1 Car parking

Car parking standards are set out in Appendix 5, Section 4, Table 2 of the Dublin City Development Plan 2022-2028. The parking standards are divided into three zones:

- Parking Zone 1 is generally within the Canal Cordon and within North Circular Road, in recognition of active travel infrastructure and opportunities and where major public transport corridors intersect.
- Parking Zone 2 occurs alongside key public transport corridors.
- The remainder of the city falls under Parking Zone 3.

The development falls under Parking Zone 2. The relevant maximum parking standards of the Development Plan 2022 – 2028 are tabulated below:

Category	Land-Use	Zone 1	Zone 2	Zone 3
	Hotel ¹	None	1 per 3 rooms	1 per room
	Nursing Home Retirement Home	1 per 3 residents	1 per 2 residents	1 per 2 residents
Accommodation	Elderly Persons Housing Sheltered Housing		1 per 2 dwellings	1 per 2 dwellings
	Student Accommodation	None ²	1 per 20 bed spaces	1 per 10 bed spaces
	Houses Apartments/ Duplexes	0.5 per dwelling	1 per dwelling	1 per dwelling

Civic, Community and	Bank Community Centre Library Public Institution	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
Religious	Place of Worship	1 per 100 seats	1 per 25 seats	1 per 10 seats
	Funeral Home	4 off street parking spaces	4 off street parking spaces	4 off street parking spaces

Figure 5-1 – Maximum Car Parking Standards

Table 5 - Maximum Car Parking Requirements							
Category	DCC Development Plan Requirements	Proposed development	Maximum parking spaces req. based on DCC Plan				
Accommodation	1 per dwelling	77 residential units	77				
Community	1 per 275 sq.m GFA	135 sq.m GFA	1				
Total	78						

The parking requirements are summarised in Table 5.1 below.

According to the Development Plan the maximum car parking spaces required are 78 spaces, 77no. spaces for the residential accommodation and 1no. space for the community centre. It is proposed to provide 28no. car parking spaces in total which equates to 0.36 spaces per unit. These car parking spaces are not designated to any residential unit which allows for greater turnover for spaces and caters for the community facility. It is also proposed to provide 2no. motorcycle spaces and 1no. loading bay.

However, the Development Plan notes that a reduced car parking provision may be acceptable where the Council is satisfied that good public transport links are already available or planned and/or a Mobility Management Plan for the development demonstrates that a high percentage of modal shift in favour of the sustainable modes will be achieved through the development.

Appendix 5, Chapter 4 Car Parking Standards of the Development Plan 2022 – 2028 states the following in relation to car parking:

"A relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location. Applicants must set out a clear case of satisfactorily demonstrating a reduction of parking need for the development based on the following criteria:

- Locational suitability and advantages of the site.
- Proximity to High Frequency Public Transport service (10 minutes' walk)
- Walking and cycling accessibility/ permeability and improvement to same.
- The range of services and sources of employment available within walking distance of the development.
- Availability of shared mobility.
- Impact on the amenities of surrounding properties of areas including overspill parking.
- Robustness of Mobility Management Plan to support the development.

The site has been reviewed in relation to the accessibility in Section 4 above and is summarised as follows:

Criteria	Response	Criteria Met
Locational suitability and advantages of the site	The location of the development is highly accessible to pedestrians and cyclists to a number of commercial and retail developments. The site benefits from excellent public transport accessibility levels including light rail and bus-based services.	Yes
Proximity to Public Transport	The closest bus stop to the site is located at Cardiffsbridge Road which is less than 100m from the site. These bus stops are operated by Dublin Bus and GoAhead Ireland. The bus services are as frequent as every 10minutes.	Yes
Walking and cycling accessibility	It avails a dense pedestrian network in its vicinity. The streets in its vicinity are catered with footways and formal crossings. There are a number of schools and retail facilities that can be accessed within 30-minute walk. There are cycle lanes provided most of the way on Finglas Road southbound.	Yes
Availability of shared mobility	There are 3 GoCar hire stations within a 1km walking catchment of the site.	Yes
Impact on surrounding properties	The site is situated within the area of Finglas West where a mix of land uses are situated including residential, retail, enterprise and leisure amenities. The proposed development would result in a similar level of movements and disturbances compared to the existing adjacent uses and it is therefore not considered that there will be negative impact on the surrounding properties.	Yes

Table 5-2 - Dublin CDP 2022 - 2028 Reduced Car Parking Criteria

In addition to the relaxation on maximum car parking standards outlined in the Development Plan, Department of Housing, Local Government and Heritage publication titled 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' actively promotes a reduction in car parking numbers within urban neighbourhoods. This document includes a Specific Planning Policy Requirement (SPPR) in relation to car parking. SPPR 3 (i) states the following:

"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."

Table 3.1 outlines density ranges for the city and suburbs areas of Dublin and Cork. Urban neighbourhoods are defined as follows:

"The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork"

Chapter 13 of the Dublin City Development Plan 2022-2028 details Strategic Development and Regeneration Areas (SDRA). Finglas Village and Environs and Jamestown Lands have been designated as a SDRA due to the strategic location of the area, the proposed new public transport network and the extent of available lands suitable for regeneration, covering an area of 52 hectares in total.

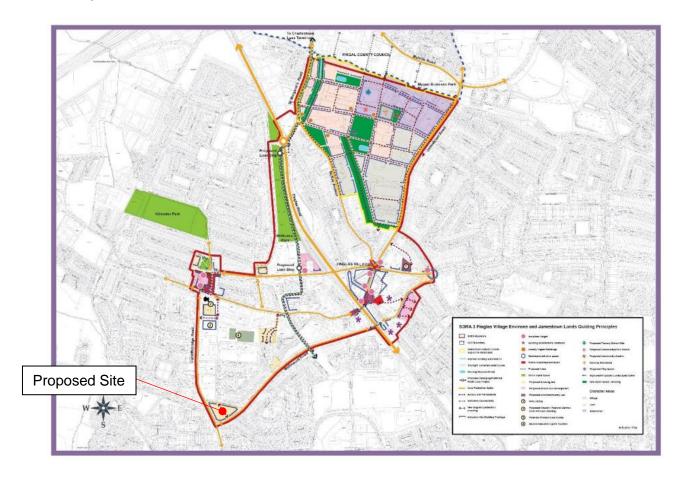


Figure 5-2 – SDRA 3 Finglas Village Environs and Jamestown Lands (Extract from Figure 13-3 of the Dublin City Development Plan 2022 – 2028)

Table 3.8: Accessibility, High-Capacity Public Transport Node and Interchanges are defined as those which are located within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'12 stop.

The subject site is located close to Spine B which is defined as very high frequency spine with proposed frequencies of 3-5 mins based on the latest revision of network. Line O/S2 also runs directly along the western boundary of the site providing an orbital route around the city at a frequency of 5-10 mins. The closest bus stop to the site is less than 100m from the site along Cardiffsbridge Road.

SPPR 3(i) thereby gives justification for a substantial reduction in the quantum of car parking provision due to the public transportation offerings in close proximity to the site. The proposed parking provision of 28 no. parking spaces or 0.36 spaces per dwelling is therefore considered appropriate for the reasons outlined above.

5.2.2 Bicycle Parking

Bicycle parking standards are set out in Appendix 5, Section 3, Table 1 of the Dublin City Development Plan 2022-2028. The bicycle parking standards are tabulated below:

Category	Land-Use	Zone	Long Term	Short Stay/Visitor
Accommodation	Hotel ¹	All Zones	1 per 5 staff	To be determined by the planning authority on case by case basis
	Nursing Home Elderly Persons Accommodation/ Sheltered Housing ²	All Zones	1 per 5 staff 1 per 5 residents	1 per 10 residents
	Residential Apartment ³	All Zones	1 per bedroom	1 per two apartments
	Residential Dwelling	All Zones	1 per unit	1 per 5 dwellings
	Student Accommodation	All Zones	1 per bedroom	1 per 5 bedrooms
Civic, Community and Religious	Bank Community Centre Library Public Institution	All Zones	1 per 5 staff	1 per 100 sq. m. Gross Floor Area(GFA)
	Place of Worship	All Zones	-	1 per 20 seats
	Funeral homes	All Zones		To be determined by the planning authority on case by case basis

Figure 5.3 – Maximum Bicycle Parking Standards based on DCC Development Plan 2022 – 2028

The bicycle parking requirements are summarised in Table 5.3 below.

Table 5.3 - Maximum Bicycle Parking Requirements					
	DCC Development Plan Requirements			Maximum park req. based on	
Category	Long Term Parking	Short Stay/ Visitor	Proposed development	Long Term Parking	Short Stay/ Visitor
Accommodation	1 per bedroom	1 per 2 apartments	77 residential units (38 no. 1-bedroom, 25no. 2-bedroom, 14no. 3-bedroom)	130	39
Community	1 per 5 staff	1 per 100 sq.m GFA	135 sq.m GFA	1 (Assumed 40 sq.m per staff)	1
Total				131	40

According to the Development Plan the maximum bicycle parking standard required equates to 131no. long term spaces and 40no. short term spaces. It is proposed to provide 175no. bicycle parking spaces within the development which meets the maximum bicyle parking requirements set out by DCC. The long stay parking will be secured in indoor bike rooms accessible by residents only.

5.2.3 Trlp Generation

A review of trip generation factors contained within the TRICS database was carried out. TRICS data is primarily UK based, although a number of Irish sites have recently been included and the number of Irish sites continues to expand. Nevertheless, we consider that TRICS will provide a reasonable indication of traffic generation from the proposed development.

Notwithstanding the above, internal research undertaken by TRICS has shown that there is no direct evidence of trip rate variation by country or region. The use of English, Scottish or Welsh data can be equally applicable to Ireland if users take into account important site selection filtering factors such as levels of population, location type, local public transport provision, and development size and car ownership level, amongst others.

Data supplied for inclusion in TRICS undergoes a procedure of validation testing, and there is no evidence from this procedure suggesting that data from Ireland bears any significant fundamental differences to that from the other countries included. Consequently, we consider that TRICS will provide a reasonable indication of traffic generation from the proposed development.

TRICS Trip Rates

TRIP RATE FOR LANDUSE 03 – RESIDENTIAL /L – MIXED AFFORD HOUSING (FLATS AND HOUSES)

TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period.

	Arrivals		Departures			Totals			
Time Range	No. of Days	Ave DWELLS	Trip Rate	No. of Days	Ave DWELLS	Trip Rate	No. of Days	Ave DWELLS	Trip Rate
00:00-01:00									
01:00-02:00									
02:00-03:00									
03:00-04:00									
04:00-05:00									
05:00-06:00									
06:00-07:00									
07:00-08:00	5	88	0.034	5	88	0.086	5	88	0.130
08:00-09:00	5	88	0.075	5	88	0.122	5	88	0.197
09:00-10:00	5	88	0.075	5	88	0.104	5	88	0.179
10:00-11:00	5	88	0.066	5	88	0.086	5	88	0.152
11:00-12:00	5	88	0.048	5	88	0.072	5	88	0.120
12:00-13:00	5	88	0.061	5	88	0.077	5	88	0.138
13:00-14:00	5	88	0.066	5	88	0.070	5	88	0.136
14:00-15:00	5	88	0.070	5	88	0.075	5	88	0.145
15:00-16:00	5	88	0.090	5	88	0.075	5	88	0.165
16:00-17:00	5	88	0.100	5	88	0.120	5	88	0.220
17:00-18:00	5	88	0.124	5	88	0.075	5	88	0.199
18:00-19:00	5	88	0.133	5	88	0.095	5	88	0.228
19:00-20:00	2	152	0.076	2	152	0.053	2	152	0.129
20:00-21:00	2	152	0.059	2	152	0.040	2	152	0.099
21:00-22:00									
22:00-23:00									
23:00-24:00									

Table 5-4 – TRICS Trip Rates

5.2.4 Traffic Impact

Total Number of Estimated Trips for the Development						
AM P	eak Hour (07:30-	08:30)	PM Peak Hour (17:15-18:15)			
Arrivals	Departures	Total	Arrivals	Departures	Total	
6	10	16	11	8	19	

Table 5-5 – Estimated trips for the development

Table 2.1 in the Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines, 2014 sets a number of thresholds, above which a Traffic Impact Assessment must be completed.

Traffic Management Guidelines Thresholds for Transport Assessments
Residential development more than 200 dwellings.
Traffic to and from the development exceeds 10% of the traffic flow on the adjoining road.
Traffic to and from the development exceeds 5% of the traffic flow on the adjoining road where congestion exists, or the location is sensitive.

Table 5-6 - Traffic Management Guidelines Thresholds for Transport Assessments

Table 2.3 in the TII Traffic and Transport Assessment Guidelines, 2014 sets out a series of further threshold which include:

Traffic Management Gu	idelines Thresholds for Transport Assessments
Vehicle Movements	The character and total number of trips in/ out combined per day are such that as to cause concern.
Location	The site is not consistent with the National Guidance or Local Plan Policy, or accessibility criteria combined in the Development Plan
Other Considerations	The development is part of the incremental development that will have significant transport implications.
	The development may generate traffic at peak times in a heavily trafficked/ congested area or near a junction with a main traffic route.
	The development may generate traffic, particularly heavy vehicles in a residential area.
	There are concerns over the developments potentials effects on road safety.
	The development is in a tourist area with potential to cause congestion.

The planning authority considers that the proposal will result in a
material change in trips patterns or raises other significant transport
implications.

Table 5-7 - Traffic Management Guidelines Thresholds for Transport Assessments

The development will provide 77 dwelling units and, with just 16 vehicle movements in the AM peak hour and 19 vehicle movements in the PM peak hour, the impact of the development on the surrounding road network is expected be negligible.

TMMP

6 PRE – OCCUPATION BASELINE MODE SHARE

6.1 Purpose of the Baseline

This section provides information on the travel behaviour of the existing population of the locality and similar development types. This is necessary to predict the likely travel patterns of future residents at the development sites and identifying existing constraints which may impact upon the sustainability of future development.

The subject site is located within a city suburban area with predominantly residential land uses though there are other land uses nearby within walking distances such as employment, commercial, schools and leisure.

6.2 Mode Share

The National Transport Authority's (NTA) Canal Cordon Report (2022) identifies travel trends for the Greater Dublin Area. The analysis highlighted the trend in modes used by the network users when travelling to work or school/ college through various canal cordon points. The summary of the data is for the selected site within the canal cordon points have been summarised and illustrated in Figure 6-1 below:

Current Mode Share (2019)	Target Mode Share 2028
Walking 11%	Walking 13%
Cycling 6%	Cycling/Micro Mobility 13%
Public Transport (bus, rail, LUAS) 54%	Public Transport (bus, rail, LUAS) 57%*
Private Vehicles (car, taxi, goods, motorcycles) 29%	Private Vehicles (car, taxi, goods, motorcycles) 17%

Figure 6-1 – Current and Target Mode Share (Source: Dublin City Development Plan 2022 – 2028: Chapter 8 Sustainable Movement and Transport)

The cordon counts indicate a significant increase in active travel as well as a reduction in the use of private car in the area enclosed by the two canals. Currently 71% of people travel into the city by sustainable modes (walking, cycling and public transport). The current mode share is 11% for walking and 6% for cycling providing a total mode share for active travel of 17%. It is acknowledged that some of the major transport infrastructure will progress through planning and construction phases. The plan therefore seeks to significantly grow the mode share for active travel to 26% and public transport to 57%.

Whilst the Canal Cordon data is not specific to social housing developments, it provides indicative travel trends for residential developments. Refer to Figure below for summary diagram of all modes of travel from the outskirts passing the Canal Cordon from 2006 to 2022.

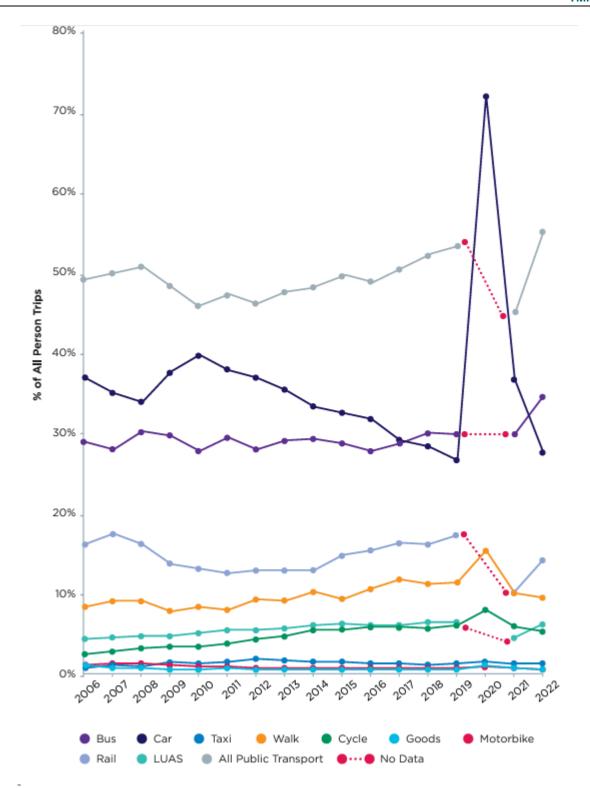


Figure 6-2 – Mode Share of People Crossing the Canal Cordon by Mode of Travel (Source: Canal Cordon Report 2022, Figure 3)

7 AIMS AND OBJECTIVES OF THE TMMP

7.1 Overview

To measure the ongoing success of the TMMP and its various measures, it is important that a series of targets and objectives are set at the outset.

As this is pre-occupation residential TMMP, it is expected that the final targets of the TMMP will be taken forward upon site occupation. As such, the pre-occupation baseline targets should be at this time considered as guidance until post- occupation baseline residential surveys are undertaken.

7.2 Aims and Objectives

The overall aim of the TMMP for the proposed development is to minimise the proportion of single occupancy vehicle trips and address the forecast transport impacts of the endusers of the site. The objectives can be summarised as follows:

- Consider the needs of residents in relation accessing facilities for employment, education, health, leisure, recreation and shopping purposes, including identifying local amenities available that reduce the need to travel longer distances.
- Reduce the vehicular traffic generated by the development including developing measures to reduce the need to travel, such as the provision of ancillary facilities (gym, food/ beverage facilities, business area co – working spaces, convenience retail and parcel delivery/ collection services).
- Develop good urban design by ensuring permeability of the development to neighbouring areas and provisions of cycle facilities.

7.3 Targets

Targets are the specific quantitative goals based on the objectives described above. Targets are important as they give the TMMP direction from its inception, providing measurable goals.

Since the overall aim of the TMMP is to reduce reliance upon the private car, it is appropriate to set a target which relates to this objective. The primary outcome indicator used will be mode share of the resident of the proposed development.

It will therefore be necessary to collect data to identify and understand the post-occupation baseline and ongoing travel habits, against which the TMMPs progress can be measured. It is recommended that resident's travel surveys will establish the post-occupation baseline travel data for the Wellmount Road site and inform the final TMMPs targets.

8 MOBILITY MANAGEMENT MEASURES

8.1 Proposed TMMP Action Plan Measures

TMMPs have a wide range of possible "hard" and "soft" measures from which to choose from with the objective of influencing travel choices. The following section introduces proposed TMMP measures that can be implemented once the site is occupied. The finalised measures within the TMMP will be informed by the insight gained by the Post-Occupation Baseline Travel Survey results.

The proposed residential TMMP Action Plan is summarised into the following sections:

- Mobility Manager (MM).
- Welcome Travel Pack.
- Marketing and Travel Information.
- Personalised Travel Planning.
- · Walking.
- Cycling.
- Public Transport.
- Managing Car Use.

8.2 Mobility Manager

A Mobility Manager will be appointed, and their role will be to manage the implementation of the Residential TMMP for the Wellmount Road site. The role involves being the main point of contact for travel information, promotion, and improvements. This may also be organised in the form of a residents' group once the development is fully occupied and operational. The remit of the Mobility Manager includes the following:

- To develop and oversee the implementation of the initiatives outlines in the TMMP Action Plan below.
- To monitor the progress of the plan, including carrying out annual Residential Travel Surveys.
- To actively market and promote the social, economic, and environmental benefits of sustainable travel to residents.
- To provide sustainable travel information, support and advice to residents including available bus service timetables, walking, and cycling maps, car-sharing, cycle hire services, local cycling and walking schemes and events.

8.3 Welcome Travel Pack

A 'Welcome Travel Pack' can be provided to all new residents with the intention that each resident is made fully aware of the travel choices available to them. This will also give the best possible opportunity to the new residents to consider more sustainable modes of travel.

The Welcome Travel Pack will include a variety of sustainable travel information and incentives about the development and the wider local area. It can include measures such as:

- Provision of information on the site's available sustainable travel services (including cycle parking).
- Provision of information on services and amenities provided locally (both on-site and nearby), particularly those within walking and cycling distance.
- Maps showing the pedestrian and cycle routes in proximity to the site, including site
 cycle parking and cycle hire locations; advised routes (with journey times) into the
 city centre and to public transport interchanges (e.g., Connolly Station).
- Provision of information about local public transport services and tickets including a plan showing the location of bus stops, Luas stops, and bus routes.
- Provision of information on the health benefits of walking and cycling.
- Provision of details of online car-sharing services along with the benefits of car sharing, such as reduced congestion, better air quality, reduction in traffic noise and cost savings to the individuals taking part.
- Provision of information on the financial and environmental costs associated with driving and support regarding tips for green diving techniques.

8.4 Marketing and Travel Information

Marketing and raising awareness will involve directly engaging with individuals and raising awareness of travel options as well the benefits of sustainable and active travel.

The Mobility Manager can market and promote the TMMP to residents of the development in the following ways:

- Production and distribution of the Welcome Travel Pack as described above.
- Production of dedicated printed Travel Options Leaflets (in addition to the Welcome Travel Pack) and online information which can be personalised to suit the individual needs of the site.
- Once travel surveys have been undertaken, additional leaflets can be provided which are tailored to encourage travel by a specific mode of transport.
- Organising events and activities to coincide with Bike Week, European Mobility Wek and any other national/ local sustainable travel or community events.
- Displaying regular updates on TMMP targets and activities in communal areas of the residential development.
- Promotion of sustainable travel options to residents, focusing marketing initiatives on area where there is willingness to change and promoting positive messages e.g., reducing congestion and CO₂ emissions, getting fit and active.

8.5 Walking

Walking is the most sustainable and accessible mode of travel. Any individual in fair health can incorporate walking into part of their journey. Furthermore, 30 minutes of moderate activity 5 or more times per week is likely to enhance the health and fitness of the individual. To encourage walking, a number of measures will be considered:

- Promotion of National Walking Month.
- Provision of maps of local walking routes to key destinations in the vicinity of the site.

- Making information on local pedestrian routes and facilities available.
- Raising awareness of the health benefits of walking.

8.6 Cycling

To encourage residents to cycle, the following measures will be implemented or considered:

- Provision of adequate, secure bicycle parking at convenient locations within the development.
- Posting of information on the local cycle network routes on communal notice boards and social media.
- Provision of information on the Bike to Work scheme.
- Promotion of Bike Week events in the Finglas area.
- Promotion of cycle security and bike marking schemes to reduce bike theft.
- Promotion of cycle safety.
- Setting up of a Bicycle User Group (BUG).

8.7 Public Transport

The following measures will be considered to encourage residents and visitors to travel by public transport:

- Provision of up-to-date bus details including timetables/ contact information in the welcome packs on resident notice boards.
- Provision of wayfinding information to access key transport modes.
- Liaison with local bus companies regarding future improvements and/ or extension to local services.

Cost awareness can be a contributing factor in the decision to travel by car or public transport. Residents can be made aware of the savings that can be made by purchasing season and other discounted ticket types.

8.8 Managing Car Use

To encourage lower levels of car use and private car ownership i.e. promote a car free lifestyle, the following measures can be considered:

- Designation of a section of car parking within the car park for priority use for those that car share and/ or low emission vehicles.
- Provision of details for the proposed car club and current car club operators within the vicinity of the site.

8.9 Car Parking

The Mobility Manager will be responsible for implementing and controlling the operation of a comprehensive Car Parking Management Plan. This plan will provide a structured framework to ensure efficient and effective management of both resident and visitor parking within the site. The primary objectives of the plan include optimising the use of

available parking spaces, reducing parking-related conflicts, and promoting sustainable transportation practices.

The key responsibilities of the Mobility Manager in relation to the Car Parking Management Plan will be as follows:

1. Implementation of the Car Parking Management Plan

- Development of Procedures: The Mobility Manager will develop detailed procedures for the management of parking for residents and visitors. These procedures will determine how parking spaces are allocated, the enforcement of parking rules, and the resolution of parking disputes.
- Communication and Education: The Mobility Manager will ensure that all residents and visitors are informed about the parking regulations, permit application process, and any updates to the Parking Plan. This may involve creating information materials and conducting community meetings.

2. Permit-Based Parking System

- Permit Allocation: The Mobility Manager will implement a permit-based parking system specifically for residents. Permits will be assigned based on demonstrated needs, ensuring that those who require parking the most are given priority.
- Application Process: Residents will be required to apply for parking permits, providing necessary documentation to demonstrate their need. The Mobility Manager will oversee the application process, ensuring it is fair, transparent, and efficient.
- Permit Distribution and Monitoring: Once permits are allocated, the Mobility Manager will be responsible for distributing them to approved residents. The manager will also monitor the use of permits to prevent misuse and ensure compliance with parking regulations.

3. Visitor Parking Management

- Visitor Parking Allocation: The Mobility Manager will outline procedures for the allocation of visitor parking spaces. This may include designated visitor parking areas, time-limited parking zones, or a reservation system for visitor parking permits.
- **Enforcement and Compliance:** The Mobility Manager will coordinate with enforcement personnel to ensure that parking regulations are upheld. This includes regular monitoring of parking areas, issuing warnings or fines for violations, and addressing any issues that arise.

4. Monitoring and Evaluation

- Regular Reviews: The Mobility Manager will conduct regular reviews of the Car Parking Management Plan to assess its effectiveness. This will involve collecting data on parking usage, receiving feedback from residents and visitors, and analysing trends to identify areas for improvement.
- Reporting: The Mobility Manager will prepare reports on the performance of the parking management system, highlighting successes, challenges, and recommendations for future improvements. These reports will be shared with relevant stakeholders to ensure ongoing transparency and accountability.

By effectively implementing and controlling the Car Parking Management Plan, the Mobility Manager will play a crucial role in ensuring that parking resources are used efficiently, resident and visitor needs are met, and the overall quality of life in the community is enhanced.

9 SERVICE DELIVERY MANAGEMENT PLAN

In addition to the residential units, the development includes $135m^2$ of community, cultural and arts spaces. The operators of each facility will be encouraged/ instructed to apply the following service delivery criteria to all their service suppliers in accordance with SMT 15 'Last-Mile' Delivery as stated in Chapter 8: Sustainable Movement and Transport of the Dublin City Development Plan 2022-2028.

- No large articulated trucks will be allowed.
- Small to medium size vans will be encouraged.
- Except in special circumstances, large vans will be discouraged.
- All service delivery trucks must attend outside the off peak traffic times.

It is not possible to predict the volume of traffic that will be generated by the community centre, but the current estimate is 1 - 2 small vans per week.

10 MONITORING AND REVIEW

10.1 Monitoring and Review

The monitoring of travel behaviour is vital to measure progress towards targets. Monitoring may be undertaken by the resident's association after occupation. Thus, the Mobility Manager (MM) will be a volunteer representative of the committee, this position could also be assisted by the Local Authority.

The MM will consult with the occupiers to promote the concept of the TMMP, as well as identifying objectives for encouraging active travel.

Monitoring surveys will be conducted at intervals following occupations of the development. The MMC will organise surveys aimed at obtaining updated information on the travel patterns of the residents. The TMMP will be updated on the receipt of survey results.

The MM will be responsible for monitoring on-site and off-site facilities for sustainable modes. It will be the duty of the MMC to report any significant issued observed or any useful comments received from residents on either on-site or off-site facilities.

10.2 Data Collection Analysis

As the development, has not yet be constructed, it is not possible to undertake any travels surveys.

To understand travel habits, travel surveys will be distributed to all residents after occupation. Recipients will be encouraged to participate, and the surveys would extract the following key information:

- Place of work/study.
- Usual mode of travel and reason for modal choice.
- Attractiveness of various sustainable modes.
- Any barriers of sustainable modes.
- Initiatives that would encourage residents to travel more sustainably.

The information obtained will be used to undertake travel performance indicator and modal split analysis.