

Proposed Amendments to planning conditions for Part 8 Development of 62 Social Housing units at Robbers Lane

Introduction

Sligo Cycling Campaign is a community-based, voluntary advocacy group whose aim is to make cycling in Sligo town and county safe, enjoyable, and popular for people of all ages and abilities. We are members of Sligo PPN and of Sligo Environmental Network.

Our objectives are to -

1. Advocate for safer, healthier, and quieter roads and streets, to be a voice for individuals and families who like to walk, pedal, wheel, scoot and use public transport.
2. Raise public awareness of the numerous benefits of cycling and walking for individuals and for the public realm and to promote all aspects of active travel as a normal daily activity.
3. Promote safe cycling routes to school, to the workplace, to shops or cafés, to leisure activities, or just to meet up with friends.
4. Be part of the Rural Cycling Collective campaign to make rural communities cycle-friendly and to re-balance the debate on active travel so that everyday journeys by bike across rural Ireland are enabled and supported.
5. Support the Sligo Leitrim Northern Counties Railway and the Sligo Greenway Co-op Ltd. As part of networked routes for local access services and for tourists to enjoy our wonderful natural amenities.

We are a member group of Cyclist.ie. Cyclist.ie, the umbrella group of cycling advocacy, greenway and bike festival groups on the island of Ireland

<http://cyclist.ie/> . Cyclist.ie in turn is the Irish member of the European Cyclists' Federation - <https://ecf.com/>.

The common vision of Sligo Cycling Campaign, Cyclist.ie and the European Cyclists' Federation is that cycling becomes a normal part of transport and everyday life for all ages and abilities.

Reference to urban design standards and planning guidance

We refer in this submission to the following documents

- **Sligo 2030 One Voice One Vision (Draft)** Sligo County Council
- **CSE Group Appendix E Traffic and Transport Assessment**
Chartered Consulting Engineers
- **Part 8 Planning Report Robbers Lane** Sligo County Council
- **Sligo County Council Development Plan 2017-2023**, Sligo County Council
- **Sligo County Council Development Plan 2023-2029 Issues Paper**
- **Ireland 2040 - National Planning Framework**, Department of Housing, Planning and Local Government, 2018
- **The Design Manual for Urban Roads and Streets (DMURS)**,
Department of Transport, Tourism and Sport
- The then Department of Housing, Planning and Local Government,
Sustainable Urban housing :Design Standards for New Apartments
- <https://wheelsforwellbeing.org.uk/>

Robbers Lane 62 Unit apartment Scheme:

Sligo Cycling Campaign welcomes Sligo County Council's proposal to build a social housing scheme close to schools, shops and recreational amenities. However, we are very concerned that the proposed provision for cycling does not comply

- with National Guidance (Department of Housing)
<https://www.gov.ie/en/publication/15f0b-design-standards-for-new-apartments-dsfna-2018/>
- with the Draft Vision for Sligo 2030 or
- with the stated aim of the Part 8 Report, ie to facilitate cycling. *Cycling is to be significantly encouraged as part of the development.*

In our opinion, it will be necessary to amend the proposals in order to bring the proposed development into alignment with these documents.. We would welcome an opportunity to meet with elected representatives and members from the Planning and Housing Departments to discuss our concerns.

We find it unsatisfactory that the Part 8 Report does not reference the 2018 Guidelines from the now DHLGH ***Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018.*** Instead,Page 4 of the Part 8 Report states that the authors relied on DHLGH Guidelines from 2007 and 2008

Cycling:

Appendix E of the Part 8 Report, Traffic and Transport Assessment (page 29) states *Cycling is to be significantly encouraged as part of the development.*

Page 12 of the Part 8 report furthermore states -

The proposal provides attractive connections for pedestrians, cyclists and vehicles and is easily accessible to all amenities within the area

We agree with the sentiments in the above statement but feel it is currently aspirational and needs a lot more detail. In order to have connections and accessibility by bicycle, the very first prerequisite is that residents have access to bicycle storage which is sufficient, secure, sheltered, accessible, convenient, well-lit and caters for their particular type of bicycle/mobility tricycle.

The current proposals for this development do not specify how these conditions will be met..

1. **Quantity:** The quantity of proposed bicycle storage spaces is insufficient
2. **Design:** There is no description of the design quality for the proposed “bicycle sheds”
3. **Bicycle type:** There is no reference to storage of non-standard bikes, bicycle storage for residents with a disability or residents with e-bikes
4. **Management:** There is no reference to how bicycle parking facilities will be managed
5. **Visitor parking:** There is no reference to visitor bike parking

Quantity: Page 10 of the Part 8 Report states that it is proposed to provide 110 car storage spaces and 62 bike storage spaces. This is indeed in keeping with the requirements of the Sligo County Development Plan 2017-2023 (Page 250) of one bicycle space per apartment. However, it is completely out of line with the aforementioned DHLGH document ***Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018.***

This guidance for bicycle parking and storage in new apartment developments covers location, quantity, design and management. Regarding quantity the guidelines state-

Section 4.17 p.24

Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.

The number of bedrooms in the proposed Robbers Lane development is 128, (Part 8 Report Page 2) so the **minimum** number of recommended bicycle storage spaces is 128. The guidelines indicate that 31 visitor spaces are also needed.

Apart from the Department of Housing guidelines, the bicycle storage allocation is not in keeping with the vision for a green and sustainable Sligo as described in Sligo 2030. Two of the four key areas of ambition of this document are

- Positioning Sligo as an exemplar region in addressing climate change in the context of the Sustainable Development Goals.
- Improving the living conditions and health of the people in County Sligo.

Neither will the development as currently envisaged align with the ambition for climate action described in the Issues Paper for the County Development Plan 2023-2029.

Having regard to updated national climate policy, the new Development Plan must increase County Sligo's resilience to climate change by promoting sustainable development through appropriate policies in relation to: integration of land use and transportation in the form of compact, sustainable settlements.

It should be remembered that the completion date for the Robbers Lane development is stated to be 2024. We need to build for the future, not the past.

Already, one school in the immediate catchment area, Scoil Ursula, has been included in the Safe Routes to School programme for the 2021-2022 school year. By the time the apartments are built it is likely that other schools will also be part of the programme.

Design of bike storage: The term "bike sheds" in the sentence *Bike sheds will be utilised as part of this provision.* is not reassuring. The aforementioned Department of Housing guidelines state,

Design – cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose built structure of permanent construction. Cycle parking areas shall also be designed so that cyclists feel personally safe - secure cage/compound facilities, with electronic access for cyclists and CCTV, afford an increased level of security for residents. Effective security for cycle storage is also maximised by the provision of individual cycle lockers and it is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided.

Bicycle Type: The conditions regarding bike storage attached to the planning permission need to reflect that bikes with bike-seats, cargo-bikes, bike trailers, e-bikes and bicycles/tricycles for people with a disability are more and more becoming standard. It is noted for example that 5 of the car-parking spaces are to be designated for people with a disability but there is no reference to people with a disability who cycle. Many people with a disability cannot drive and some find cycling easier than walking. Further information is available from the website <https://wheelsforwellbeing.org.uk/> It is also noted that 7 charging points for electric vehicles are to be provided throughout the development but there is no reference to charging points for e-bikes which are becoming more and more popular. It should be remembered that we are not talking here about detached houses with garages and garden sheds but about apartments with limited storage space.

Management: The DHLGH Guidelines state -

An acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking, in particular, avoiding arrangements that lead to a significant number of lockers being left locked whilst empty for instance. Cycle parking shall be the subject of a funded maintenance regime that ensures that facilities are kept clean, free of graffiti, well-lit and the parking equipment will be properly maintained. It is essential, therefore, that as far as possible cycle parking is low maintenance, easy to use and easy and attractive to use

However, we can find no reference in the planning documents to a management plan for the cycle parking facility.

Visitor Bicycle Parking: This issue does not seem to be addressed.

Other Issues pertaining to ActiveTravel:

So far we have concentrated on the issues related to bicycle storage but design of roads, footpaths and cycleways also need to be considered.

According to The Design Manual for Urban Roads and Streets (DMURS) street design

should follow a strict hierarchy, In this hierarchy, Active Travel (i.e. walking, then cycling) comes first, followed by public transport, commercial motor traffic (deliveries etc), and only then private car traffic.

Sligo Cycle Campaign regrets to state that this hierarchy does not appear to have been taken on board for the Robbers Lane/Maughearboy proposed development. We urge that this is rectified and that measures to aid and promote more cycling be included.

Under Road Safety the report states -

15.3 Cycling is to be significantly encouraged as part of the development. Sligo City Centre has cycle lanes and designated routes for the use of cyclists. Bike sheds are being provided within the development for bicycles.

However, there is little mention of cycling infrastructure or increased public transport measures which might significantly encourage cycling. There are no cycle lanes on Maugheraboy or Ballydoogan roads or designated cycle routes in this area.

Assessment of impact of the development at junctions omits to consider the effect on cyclists or include measures needed to create a safe environment for cyclists at junctions.

Robbers Lane is designated as a footpath with no reference to cyclists using it.

Robbers Lane is to be widened to 6m, the construction of a new 2m wide footpath on the western side is too narrow to safely accommodate both pedestrians and cyclists.

Conclusion:

We welcome the opportunity to feed into this planning process at an early stage and we request that our views regarding the facilitation of active travel receive careful consideration. We appeal to Sligo County Council Executive and Councillors to plan for the future, not the past and to incorporate the DHLGH guidance and these two high level goals from the draft **Sligo 2030** into their design

- Goal 3 – Sligo will be a proactive county in the fight for climate action in line with the Sustainable Development Goals
- Goal 4 – Sligo will be an inclusive, healthy, and equitable society that supports vibrant communities

The Robbers Lane development is an initiative of the County Council itself and thus offers the perfect opportunity to build an exemplar development which is inclusive, reduces car-dependency, enables sustainable travel and provides a healthy liveable space for its residents.

Returning again to the DHLGH Guidelines –

*Planning authorities should ensure that development proposals incorporate details on the provision of and access to cycle storage facilities **at planning application stage by the development proposer.** Appropriate conditions in relation to the operation and maintenance of the cycle storage facilities should be attached to any grant of permission for apartment developments. Further information in relation to the design and provision of cycle storage for apartment developments can be found in the National Cycle Manual (National Transport Authority, 2011) and Bike Parking Infrastructure Guidance (Dublin Cycling Campaign, 2017).*

We trust that in constructing this welcome development, councillors and planners will ensure that housing built by Sligo County Council will take account of the above recommendations from the Department of Housing.