Senior Executive Officer,  
Economic Development and Planning Department,  
Dun Laoghaire Rathdown County Council,  
County Hall, Marine Road,  
Dun Laoghaire,  
County Dublin. 

22\textsuperscript{nd} January 2010 

Dear Sir/Madam,  

\textbf{Proposed Amendments to the draft Dun Laoghaire Rathdown Development Plan 2010-2016}  

Under the provisions of the Planning and Development Act 2000 as amended, the National Transport Authority (NTA) submits comments on the proposed amendments to the draft Dun Laoghaire Rathdown Development Plan 2010-2016. Whilst the notice issued by the Council was addressed to the DTO (letter dated 4\textsuperscript{th} January 2010), the NTA was established on 1\textsuperscript{st} December 2009 concurrent with the dissolution of the DTO, whose planning functions were incorporated into those of the NTA. The Council’s notice as issued is therefore being treated as a notice to the NTA.  

Comments focus on two policy areas as presented in the Written Statement (Population & Residential Development and Retailing), on the following basis:  

1. Issues raised in the Managers Report on the Draft Plan (September 2009) inclusive of the Manager’s response and recommendations on submissions made on the Draft Plan  
2. The proposed amendments to the Draft Plan  
3. Overall Comment  

\textbf{1. Comment on Issues Raised in Manager’s Report}  

\textit{Carrickmines}  
It is noted that the ‘Manager’s Report on the Draft Plan’ (September 2009) does not support the designation of Carrickmines as a District Centre. The NTA is in agreement with this position.  

The NTA would concur with the recommendations set out in the Manager’s Report, that Carrickmines be omitted from the list of District Centres, for the following reasons  

- Serious concerns with regard to the location of a District Centre adjacent to a Motorway Interchange  
- The M50 acts as a barrier to pedestrian and cycling movement, reducing overall accessibility to the proposed District Centre
- The location could result in a high level of car dependency
- Its proximity to the designated District Centre at Cherrywood (less than 2.5km), which will be served by the same Luas extension and would serve much of the same catchment area as the proposed Carrickmines District Centre. It is considered that there is no supporting rationale for the location of a District Centre at Carrickmines
- The District Centre designation is at variance with the explicit presumption against large scale retailing adjacent to national routes presented under paragraph number 26 of the Retail Planning Guidelines
- The District Centre designation is also at variance with National Roads Authority Policy to protect national routes from development pressures and would result in significant transport impacts at the Carrickmines Interchange

2. Proposed Amendments

Cornelscourt
In relation to Cornelscourt District Centre, the overall strategy contained within Table 7.1 of the Draft Plan is stated as,

‘Limited expansion of retail floorspace on constrained site’,

The Council has proposed an amendment to include Section 7.8.5 Cornelscourt which states that,

‘Lettable retail sales space in the Cornelscourt District zoned lands to be capped at 25,000sqm.’

It is recommended that the Council clarify the rationale behind this change of policy and the defined maximum now specified for this location.

3. Overall Comment

In general, whilst no additional land has been zoned for residential development in the Draft Plan, there is a legacy of zoned residential land located in peripheral areas on the southern fringes of the Metropolitan Area, located in areas with low accessibility or accessibility potential relative to existing and planned public transport infrastructure.

The Draft Development Plan states in Chapter 2 that “the primary objective is one of consolidation of the existing urban area” and “… retain existing population levels in established built up areas and to increase them where feasible through continuing appropriate consolidation and densification”. Complementary to these objectives, Chapter 12 of the Draft Plan contains the following statement, “Increased densification and consolidation along strategic public transport corridors and close to public transport nodes to encourage greater usage of public transport”. The NTA would concur with these objectives and would place a critical emphasis on the achievement of a consolidated urban form and the achievement of high levels of accessibility by public transport, walking and cycling at the strategic and local levels.
The potential that this zoning legacy has to undermine the basis for development consolidation as promoted in the Draft Development Plan, in particular focused on higher order urban centres, is of concern and is a matter that needs to be carefully managed by the local authority.

Yours sincerely,

[Signature]

Gerry Murphy
CEO