

Senior Executive Officer,
Development Plan 2011 – 2017
Planning Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin.

24th January 2011

Dear Sir/Madam,

Re. Draft Fingal County Development Plan 2011-2017 (Proposed Amendments)

The National Transport Authority (the “Authority”) submits the following comments on the proposed amendments to Draft Fingal County Development Plan 2011-2017.

The Authority firstly welcomes the inclusion of a number of amendments addressing issues highlighted in the Authority’s previous submission on the Draft Fingal County Development Plan, including reference to Section 65 of the DTA Act (2008) which requires the Local Authority to prepare a ‘Local Traffic Plan’ for the County, and the specification of Commercial Car Parking standards as maxima.

As you will be aware, the Dublin Transport Authority Act, 2008 (as amended) requires that the Authority consider draft Development Plans in terms of consistency with the Authority’s Transport Strategy for the region. The Authority is currently in the process of finalising its draft Transport Strategy for public consultation and welcomes the continued involvement of Fingal County Council in its development. In the context of the draft Transport Strategy, the Authority has concerns in relation to the proposed Development Plan which it considers would need to be satisfactorily addressed to ensure the required consistency between the Development Plan and the proposed Transport Strategy. In addition, the Authority has reviewed the Development Plan amendments in the context of the Regional Planning Guidelines for the Greater Dublin Area (RPGs), and would also raise a number of concerns which should be addressed to ensure consistency between the two plans. These issues are set out in the following sections.

Core Strategy/ Settlement Strategy

It is important that the core strategy of the Development Plan demonstrates how the population targets and housing allocations of the RPGs are going to be achieved in the context of relevant land use zoning provisions for the county, as proposed. It will also be a requirement of the core strategy to demonstrate how any excess of housing land¹ would be addressed². In light of the Development Plan review process nearing finalisation, it is acknowledged that issues relating to the core strategy may have to be examined expediently under the provision of other statutory instruments following the completion of the current review process.

In considering these issues, it is also important to consider the sequential approach for the release of residential lands, as advocated in the RPGs and Departmental Guidelines relating to 'Development Management' and 'Guidelines for Sustainable Residential Development in Urban Areas'. The location of new population growth should also support the settlement hierarchy and settlement strategy contained within the RPGs, taking account of sustainable transport, infrastructural provisions and social provisions.

The Authority's draft Transport Strategy is aligned with the above principles and with the approach to development set out in the Regional Planning Guidelines. In particular, the draft transport strategy emphasises the need for development consolidation, and the focussing of significant development in locations which are compatible with the provision of high quality public transport.

In this regard, the Authority is concerned at the proposed zoning of lands for residential development to the north of Tyrellstown. This area is not located within the catchment of existing or proposed high quality public transport services nor does it support the consolidation of residential development within the Blanchardstown area.

Enterprise and Employment

In relation to economic development and employment generating uses, it is important that land use zoning objectives and economic objectives support the economic core areas and economic growth centres contained within the RPGs, and the related economic policies/recommendations. The preferred location for such development is within RPG designated mixed use urban settlements which support employment and residency in close proximity to each other and serviced by strategic multi-modal transport corridors to help reduce travel distance and green-house gas emissions. New zonings and provisions for employment uses in more isolated locations and which are detached from existing settlements should, therefore, be discouraged as they have the potential to undermine the sustainable development of the regionally designated economic growth areas, infrastructural investments and sustainable transport.

The Authority would highlight, in particular, its concerns in respect of the modification of zoning objectives in the areas of Blanchardstown North, the South Fingal Fringe area, and at the more specific locations of Hedgestown Interchange on the M1, and the Cherryhound Interchange on the N2. The rationale for zoning objectives included at these locations does not appear to be aligned with the provision of appropriate public transport infrastructure.

¹ Lands zoned for residential use and mixed use zonings which allow residential uses.

² As per Chapter 3 of the DOEHLG publication 'Implementation of Regional Planning Guidelines Best Practice Guidance' December 2010.

Physical Infrastructure

Road Construction and Improvement Measures

As previously stated the Authority welcomes the reference to Section 65 of the DTA Act (2008) in the proposed amendments. However, in the interest of sustainable transport planning, the Authority would suggest that the requirement for the road improvement schemes set out in Table T04 should be considered in the context of the council's Local Traffic Plan, and not be included as a prerequisite to this plan. The Authority would reiterate its previous comment that an objective should be included in the Development Plan which reflects this, for example:

Set out an implementation plan for the road schemes in Table T04, as part of a 'local traffic plan', to be prepared following the publication of the National Transport Authority Strategy for the GDA.

Car Parking Standards

The Authority supports the specification of Commercial Car Parking standards as maxima. However, it is recommended that a lower maximum value be applied to office employment (1 space per 50 sq.m., as specified in previous submission). This more restrictive standard is consistent with the presumption that office-based development would be located within areas benefiting from good public transport service levels.

Conclusion

It is the view of the Authority that the issues outlined in this letter will need to be addressed by the Council to ensure that consistency between the Council's Development Plan and both the Regional Planning Guidelines and the Authority's forthcoming Transport Strategy for the region. The Authority would be happy to expand on the detail of these issues further if required.

Yours sincerely,



Gerry Murphy
Chief Executive Officer

