Tony Shanahan  
Planning Department,  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24.  

2nd July 2010

Dear Sir/ Madam

Re: Proposed Amendments to the Draft South Dublin Development Plan 2010-2016

The DTA Act 2008 and related amendments to the Planning and Development Act 2000 assign a statutory role to the National Transport Authority (NTA) in the preparation of development plans by local authorities within the Greater Dublin Area. Although the legislation provides a consultative role to the NTA in the making of development plans, in the case of the South Dublin County Council Development Plan 2010 - 2016. Under the circumstances and given the recent establishment of the NTA, the primary intention of this submission is to respond to issues raised in the Managers Report on the Draft Plan (February 2010) and set out a number of comments on the amendments to Draft Development Plan.

Comments focus on the following:

2. The proposed amendments to the Draft Plan and amendments which the NTA recommend should be made to the Draft Plan.

Background:
Section 31C(1) of the Dublin Transport Authority Act 2008 assigns the NTA a role in the making of a development plan. Where a notice is received by the DTA under section 12(1) it shall, as part of any written submission on the draft development plan, state whether, in its view, the draft development plan is—

(a) consistent with its transport strategy, or
(b) not consistent with its transport strategy and in such case what amendments to the draft plan it considers necessary to achieve such consistency.

1 As amended by section 30(C) of the Public Transport Regulation Act 2008
As the NTA is currently preparing a transport strategy, this submission is based on existing national land use and transport policy that may have a bearing on the completed transport strategy. In this, the NTA places a critical emphasis on the need for a coherent approach to be taken in the prioritisation of investment in transport infrastructure in relation to the draft RPG’s transport policies and objectives, as well as other policy areas such as settlement and economic development. The comments are based on the general objectives of the NTA as set out in section 10 of the Dublin Transport Authority Act 2008 as amended, where the authority is required to seek the following objectives –

(a) the development of an integrated transport system which contributes to environmental sustainability and social cohesion and promotes economic progress,
(b) the provision of a well-functioning, attractive, integrated and safe public transport system for all users,
(c) improved access to the transport system and, in particular, to public passenger transport services by persons with disabilities,
(d) increased use of the public transport system,
(e) regulated competition in the provision or licensed public bus passengers services in the public interest,
(f) the objectives set out in Section 9 of the Act of 2003 (taxi regulation),
(g) increased recourse to cycling and walking as means of transport, and
(h) value for money.

It is within this context, that the NTA is making a submission on the proposed amendments to the Draft South Dublin Development Plan. This includes comments on the following:

- 0.1 Introduction and Core Strategy – Ref. PA002
- 2.2 Transportation – Ref. No. PA053, PA054, PA057, , PA059, PA060, PA066, PA068, PA069, PA070
- 3.2 Enterprise and Employment – Ref. No. PA105, PA107, PA125
- Schedule 6 Housing Strategy – Ref. No. PA213
- Appendix 9 The European Charter of Pedestrians’ Rights – Ref. No. PA238

0.1 Introduction and Core Strategy

Proposed Amendment Ref. No. PA002 - (Core Strategy)

Comment

With regard to Amendment Ref. PA002 of the Draft Plan, the NTA notes that the population targets in the Regional Planning Guidelines 2010-2022 would now be included.
However, regarding the distribution of this population growth, it the legacy of zoned residential land located in peripherally located areas on the western and southern fringes of County built up area has the potential to undermine the Draft Development Plan’s emphasis on development consolidation at higher densities along public transport corridors and higher order urban centres. These areas are generally remote from existing or proposed public transport infrastructure or higher order urban centre facilities, and their development would contribute to a continuation of the existing extensive/low density pattern of development, without a provision for development phasing across the County as a whole.

Phasing is required to ensure that population and employment growth is focused in the first instance on higher order urban centres and the catchment areas of public transport and other services required at the local level. If there is a reduction in the rate of population growth, below that currently targeted, it is especially important that the development is consolidated occurs.

Where there is a surplus of residential zoned land, the prioritised phasing of development, to, for example, manage housing growth would also support the consolidation of development and the population targets presented in the Regional Planning Guidelines 2010-2022. In this regard, it is stated in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas that “the development plan should identify where practicable the sequential and coordinated manner in which zoned lands will be developed ... with undeveloped lands closest to the core and public transport routes being given preference” (p.8, 2.3).

**Recommendation**

It is recommended that the Draft Plan reflect the significant constraints in providing public transport to rural and peri-urban areas. The South Dublin Development Plan should therefore specify criteria to guide the phasing of zoned development land related to relative levels of accessibility by public transport, walking and cycling and proximity to local services.

The Draft Plan should highlight this as among the key reasons for the need to control development in rural areas, and for focusing growth into higher order centres, which will facilitate the development of a critical mass of population that can support the viability of providing effective public transport.

There should be a presumption against any further zoning in peripheral areas and phasing of development of existing zoned lands. This phased approach should focus on the consolidation of existing urban areas based on the hierarchy of urban centres (as defined in the Development Plan), with particular reference to areas serviced by high quality public transport and services such as shops and schools. Over the period of the, plan development should be phased to reflect the delivery and deliverability of public transport. This sequential approach should be incorporated into the core strategy.
2.2 Transportation

Amendment Ref. No. PA053 – (Quality Bus Corridors)

Comment
The Dublin Transportation Office has been subsuned by the National Transport Authority.

With regard to the proposed amendment’s reference to the QBC network South Dublin County Council should have regard to the NTA’s comments on Amendment Ref. No. PA0069 in relation to the NTA Strategy and implementation plan.

Recommendation
Replace ‘DTO’ with ‘NTA’

Amendment Ref. No. PA054 – (Underutilised QBC’s - Amendment to reallocate road space from buses to general traffic)

Comment
The amendment to the Draft Development Plan does not identify the QBC’s in question, why these QBC’s are considered underutilised and whether the reallocation of road space currently allocated to bus, to other road users, is on a temporary or permanent basis. The QBC network should be considered as a whole as the removal of specific segments of the network could undermine its overall benefits, in terms of service levels and public transport penetration. The NTA does not support the inclusion of Amendment Ref. No. PA054.

In any case, in advance of any reallocation of road space it would need to be demonstrated that there is a lack of public transport demand on the routes in question, taking into consideration the potential for bus route reconfiguration.

Recommendation
The NTA recommends that Amendment Ref. No. PA054 is not included in the Development Plan.

Amendment Ref. PA057 – (Cycling and Walking – Amendment to provide additional policies on walking and cycling)

Comment
The proposed amendment to improve road safety for pedestrians and cyclists by lowering...“speed limits and priority over motorised transport...” should certainly be the ambition for town centres and residential areas, but that approach should not be applied across the board. The statement also appears to contradict Table 2.2.
roads are identified for ‘on road cycle tracks’ and others for ‘off-road cycle tracks’. However, it is noted that all roads in Table 2.2. involve the provision of some class of cycle track, i.e. no road is identified for mixed cycling with no infrastructure (which the statement above appears to refer to).

Table 2.2 whilst identifying specific roads as part of the dedicated cycle infrastructure network, provides very little information on the detail of these routes. Where possible, dimensions and particulars should be specified. It is also inconsistent in the relationships between cycle facilities and road type, e.g. Blessington Road and City West is a national road with on road facilities, whilst Calmount Road is a local road with an off-road cycle track.

Recommendation
The NTA recommends that this amendment is reworded as follows:

‘Cycle provision, whether integrated with low speed, low volume general traffic in locations such as town centres or residential areas, or segregated from general traffic on higher speed and volume roads, will be provided in line with the forthcoming NTA’s National Urban Cycle Design Manual’.

This process would include inter alia:

- Survey of the existing infrastructure
- Quality of Service Rating
- Network Planning for cycling as part of the overall Network Planning for all modes on all routes (NB including HGV’s)
- Segregation vs. Integration of facilities
- Provision of cycleways and other off-road routes, e.g. through parks etc.
- Development of a cycle parking policy – for public and private developments
- Interaction between cycling and public transport.
- Special attention paid to routes to school.

Proposed Amendment Ref. No. PA059 – (Park & Ride facilities —to examine lands beside the former Tara Co-op site with a view to determining the suitability of this location for a park and ride facility)

Comment

General Comments on Park and Ride
The NTA supports the provision of Park and Ride facilities, where and when they can contribute to a reduction in car usage and car-based congestion. However the authority has some concerns in relation to the location of the proposed sites. In general it needs to be clearly stated whether the function of these Park and Ride facilities relate to bus or rail and whether these sites would be of a strategic or local function. Strategic Park and Ride (in terms of rail) is defined as the provision of rail
Park and Ride facilities where the national road network meets the rail network. Rail based, local Park and Ride is defined as the provision of car parking at rail stations to cater for the demand for parking from the surrounding area, but beyond the natural walking or cycling catchment. The recommendations of the bus based park and ride study indicate a limited potential for bus based park and ride in Dublin, but recommended the piloting of a site on the national road network.

In general, park and ride facilities, whether they be strategic or local, should only seek to cater for trips, where no reasonable alternative exists to the use of the car, in the first instance and should not negatively impact on the attractiveness and viability of reasonable alternatives, in particular scheduled bus services.

It is unclear from table 2.2.3 whether the proposed park and ride sites are proposed to be strategic or local in function. The proposed amendment PA0059 should therefore be amended / expanded on, to include criteria of how all proposed park and ride sites were identified and whether these sites are local or strategic.

**Specific Comments on proposed amendment (Tara Co-op Site) and other sites already listed in the Draft Development Plan**

In relation to the proposed inclusion of the Tara Co-op site, whilst it is appreciated that the amendment seeks to examine the site to determine its suitability, it is not clear even at this stage, why park and ride would be either necessary or desirable in this town centre-type location. In general transport policy terms, the attraction of car-based trips into a park and ride facility in a town centre location is not consistent with the objective of reducing congestion in town centres and promoting the use of public transport, walking and cycling in the first instance.

In the case of the Garters Lane site, it is not clear why this would be required, in addition to the facility already committed to at Cheeverstown stop and the existing facility at the Red Cow stop.

In the case of the Walkinstown Roundabout site, it is not clear what the basis for this would be. In general, it would appear to conflict with the general objectives relating to the provision of park and ride.

**Recommendation:**

The site of the subject proposed amendment and the other park and ride sites listed in the Draft Development Plan should be re-examined and park and ride policy should be revised to include a criteria based approach, identifying whether the proposed sites are rail or bus based and whether they are strategic or local.

**Proposed Amendment  Ref. No. PA060 – (National Routes – Amendment to keep the number of junctions to a minimum)**

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Comment
The NTA supports this proposed amendment.

Proposed Amendment Ref. No. PA066 and Managers Report p. 72 – (Car Parking Standards)

Comment
Having regard to proposed amendment Ref. No. PA066, the Managers Report (p.72) and the car parking standards presented in the Draft Development Plan, the NTA views the supply and management of parking as central to the management of transport demand. It has a critical influence on mode choice for trip generating uses such as employment, retail and education. It also has a critical influence on traffic management and the design of new developments and the allocation/design of space in urban areas. The control of car parking is therefore a key demand management measure to influence travel behaviour in South Dublin.

Whilst the policy to require maximum parking standards is welcomed, the NTA does not agree that such standards should be “required” rather than “permitted”. This undermines the principle of applying maximum parking standards.

Related to this, Table 2.2.4’s Note no.6, states that for developments within county town and town centre areas (Zoning objectives ‘CT’ and ‘TC’) and directly adjoining the Luas line and QBC’s the parking standards may be reduced by up to 20%. This approach is a presumption that the maximum standard is required in almost all locations and can only be reduced by a maximum of 20% in limited circumstances.

The level at which maximum standards are set is of great importance. Where they exist, maximum standards are usually applied with varying degrees of constraint, on the basis of defined location factors such as centrality (for example, town centre location) and public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks). Related to these attributes, the application of parking standards would normally vary inversely with density.

In the Manager’s Report, it is recommended that a spatial approach be taken to retail car parking based on proximity to public transport and floor space over 1000 sq-m. Whilst the NTA supports a spatial approach in principle, it is recommended that spatially defined parking standards be applied for land uses, in particular trip attracting uses such as employment, retail and education. These should be based on attributes such as proximity to public transport and urban centres (based, for example on the proposed hierarchy of centres). This could take the approach of a zonal designation of parking standards, such as that applied in the Dublin City Council Development Plan.
Recommendation
The NTA therefore recommends that the Planning Authority replaces required maximum parking standards with permitted maximum parking standards, combined with a spatial definition, as described above. This should take into account the location of development in relation to existing and future public transport, and other services such as town or district centres, where alternatives modes to the private car are more readily available.

Proposed Amendment Ref. No. PA068 (Roads Objectives)
Comment
The Dublin Transportation Office has been subsumed by the National Transport Authority.

In regard to the Roads Objectives, the Draft Development Plan should have regard to the comments made on Amendment Ref. No. PA0069.

Recommendation
Replace ‘DTO’ with ‘NTA’.

Proposed Amendment Ref. No. PA069 – (Six Year Roads Objectives)
Comment
It is recommended that a number of additional amendments be included in the Draft Plan to reflect the role of the NTA in future transport provision in South Dublin. The Draft Plan proposes a number of road and public transport projects during the plan period and in the longer term. Some of these proposals are currently being assessed as part of the NTA Strategy, as specified by Section 12 of the Dublin Transport Authority Act 2008. To ensure that such proposals meet national policy objectives, as specified under Section 12 of the Dublin Transport Authority Act 2008. Each proposal will be considered by the NTA,

- Against economic, environmental and social criteria, as specified in the NTA Strategy;
- As part of future strategy implementation plans; or
- On a case-by-case basis, as they proceed through the planning process.

Under Section 13 of the DTA Act 2008, the NTA is also required to make an Integrated Implementation Plan within 9 months of the approval of the NTA Transport Strategy and under Section 64 of the Act, to prepare a Strategic Traffic Management Plan. This will have regard to road infrastructure and public transport proposals and reflect the need to ensure the most beneficial, effective and efficient use of financial resources.
Furthermore, under Section 65 of the Dublin Transport Authority Act 2008, each local authority is required to prepare a ‘Local Traffic Plan’ for its functional area. This must be consistent with the Strategic Traffic Management plan to be produced by the NTA (Section 64 of DTA Act 2008).

It is the view of the NTA that the Development Plan should refer to the role of the NTA Strategy, in relation to identifying the requirements for new road schemes or road improvements.

**Recommendation**
The preparation of a ‘local traffic plan’ for the County (as referred to above) and the need for it to be consistent with the NTA’s Strategic Traffic Management Plan should be included as a stated objective of the Development Plan.

Related to this, it is the NTA’s view that transport objective T34, which commits to implementing the road improvement schemes set out in table 2.2.5, p.112 (Amendment Ref. No. PA069) is premature in light of the local authorities’ statutory requirement under Section 65 of the DTA Act. The NTA would therefore recommend that objective T34 be replaced with a statement that reflects this, for example:

Review, and setout an implementation plan, for the road schemes in table 2.2.5 as part of a ‘local traffic plan’ to be prepared following the publication of the NTA Transport Strategy for the GDA.

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**3.2 Enterprise and Employment**

**Proposed Amendment Ref. No. PA-107**

**Comment**
In relation to the location of employment intensive uses, the NTA would recommend that large-scale employment-intensive uses be located primarily within areas served by existing or planned high quality transport infrastructure, particularly favouring development within public transport corridors and within higher order urban centres which will benefit from rail based public transport.

Amendment Ref. No. PA107 states:

> “3.2.9.x- EE11(A): Offices over 1000 m2 in Enterprise Priority Two Zoned areas – It is the policy of the Council that offices over 1,000 m2 in EP2 areas shall be...”
considered in areas where the planning authority is satisfied that there is sufficient public transport provision and the scale of the office reflects the existing scale and layout of the existing area. Underground car parking will not be considered appropriate for such uses in EP2 locations”.

The NTA would not support the inclusion of such a policy, as it could undermine the objective to focus employment intensive uses in proximity to rail nodes and higher order urban centres. It is stated in the Managers Report (p.116) that

“the capability of movement of lower intensive uses from established areas in close proximity to the public transport network, to areas in the County where there are sufficient lands to promote different land uses is a priority of the Council”.

However the proposal to provide offices of over 1000 sq-m in EP2 zoned areas appears to be in conflict with the objective of relocating lower employment intensive uses to these areas and could undermine the ability to redevelop established areas, which seems to have formed the basis for rezoning of EP2 zoned lands in the first instance.

Recommendation
The NTA recommends that proposed Amendment Ref. No. PA 107 is not included in the Development Plan.

Enterprise and Employment Zoning and Manager’s Report p. 115 & 116
(This section does not related to a proposed amendment)

Comment
The Draft Development Plan proposes to zone additional lands for enterprise and employment (south, north and east of Baldonnel Airport). The NTA would recommend that no further zoning occurs until it is clearly demonstrated that there is insufficient enterprise and employment zoned land in the county.

Recommendation
In the absence of an explanation for the requirement of this additional zoned land, the NTA recommends that the lands zoned for enterprise and employment to the north, south and east of Baldonnel Airport are not provided for in the Development Plan.

Schedule 6 – Housing Strategy

Amendment Ref. No. PA213 - (Population Trends/Projections – Amendment to Section 4.1)
Comment
The commentary on the National Population projections should be reworded to reflect the fact that a substantial reversal from recent migration trends is likely to pertain over the Plan period. The statement

“in light of recent trends and economic conditions, it is likely that net immigration increases demonstrated in previous years will start to decline”

understates the changes that have already occurred, in relation to migration in recent years. At a national level, recent net immigration has likely been replaced by net emigration. Within the GDA this pattern may also pertain and at County level, net out migration appears to have been a feature over a longer period.

In light of current trends and how they are likely to be impacting on the County, there is a critical need for the Development Plan to effect a reversal in the recent relatively slow rate of population growth in the County, being as it is, park of the Metropolitan Area. It is the NTA’s view that this objective could be aided through a stronger development focus on those areas which demonstrate the greatest development potential by virtue of their accessibility by public transport to key destinations within the County and the Metropolitan Area generally. This sentiment is reflected in other comments the NTA has made on the Plan’s proposed amendments.

Table 4.2:
The population forecasts from the RPG 2010 – 2022 are compared to the Department of the Environment forecasts 2007. The Department of the Environment 2007 figures have been superseded by 2009 projections. This table should be amended to reflect this. In addition the RPG national total for 2016 appears to be incorrect (this figure should be 4,997,000).

Recommendation
It is recommended that the commentary on national population projections is reworded to reflect current migratory trends, as described above.

The population forecast table 4.2 should be revised to provide the correct figures.

Appendix 9 The European Charter of Pedestrians’ Rights

Proposed Amendment Ref. No. PA238 (The European Charter of Pedestrians’ Rights)

Comment
The NTA notes the insertion of The European Charter of Pedestrians’ Rights however it is unclear in what manner this charter has influenced the County’s policies on walking and pedestrians.
Recommendation
Given its inclusion in Appendix 9, it is recommended that the draft development plan should be amended to show how the European Charter of Pedestrians’ Rights has influenced the Plans policies.

Yours Sincerely

[Signature]

Gerry Murphy
Chief Executive Officer