Development Plan Team  
Planning Secretariat,  
Planning and Economic Development Department  
Dublin City Council,  
Block 4, Floor 3, Civic Offices  
Civic Offices, Wood Quay  
Dublin 8

11th March 2010

Re. Dublin City Draft Development Plan 2011-2017

Dear Sir/Madam,

The National Transport Authority (NTA) submits the following comments on the Dublin City Draft Development Plan 2011-2017. In doing so, the NTA places a critical emphasis on the intrinsic link between proper planning and sustainable development and the role of walking, cycling and public transport as modes of transport across all trip purposes, with a particular focus on the following:

- The transport investment priorities for the period of the development plan.
- The scope to maximise the performance of the transport system by effective land use planning.
- Recommendations regarding the optimal use, location, pattern and density of new development, and
- Recommendations on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.

As such, it is imperative that the Development Plan supports the targets, policies and objectives of the National Spatial Strategy, the Regional Planning Guidelines for the GDA, Smarter Travel *A Sustainable Transport Future*, various planning guidelines prepared by the DoEHLG and complements the capital investment programme set out in Transport 21.

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 does provide a consultative role to the NTA in the making of development plans, in the case of the City Council, it is noted that the process has already progressed to Draft stage. Under the circumstances and given the very recent establishment of the NTA, the primary intention of this submission is to set out a number of general observations on the Draft Development Plan, which are based on the objective of delivering transport in the most effective manner from a social, environmental and economic perspective.
Overall Position

The NTA supports the overall thrust of the Draft Development Plan on the basis of the following positive attributes:

- The strong emphasis on the consolidation of development within the City Centre generally, and public transport nodes/interchange nodes in particular, with complementary policies/objectives relating to the design of the public realm; and
- the appropriate allocation of space to reflect the prioritisation of walking, cycling and public transport;
- A focus on accessibility to a wide range of services at the local level and the focusing of regional population and employment growth on the City;
- An emphasis on improving the quality of the public realm through better urban design, connecting pedestrian, cycle and public transport networks, green corridors, reduction in the dominance of vehicular traffic and all this implies (improving air quality, noise, severance, safety and the appropriate allocation of space);
- The recognition that higher development densities are dependent on the qualitative aspects described above;
- The emphasis on the development of the City Centre as the main regional economic driver and on the need to improve its functionality in transport terms;
- Outside of the City Centre, the emphasis on the consolidation of development within public transport corridors and on the basis of a hierarchy of centres;
- The application of high minimum residential densities, which are determined on the basis of proximity to public transport, centrality within the city and location within key district centres.

This submission focuses on the following themes:

Population Growth and Housing

It is stated in the NSS that “the physical consolidation of Dublin, supported by effective land use policies for the urban area itself, is an essential requirement for a competitive Dublin. Consolidation is also required for the public transport system to function effectively” (National Spatial Strategy, p42).

The NTA supports the Draft Development Plan objective of “making Dublin the heart of the region” (a Core Strategy Priority). A corollary of this is that the City should be the focus for the consolidation of population growth within the wider City Region. If effective, this would support the basis for investment in high quality, high capacity public transport investment in the Dublin Region, as committed to by Government through the Transport 21 programme of investment.

This would also support the aim in Smarter Travel A Sustainable Transport Future “To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas” (p28, Smarter Travel, A Sustainable Transport Future).
Economic Development & Employment

It is stated in Smarter Travel A Sustainable Transport Future that "the provision of a high quality and sustainable travel and transport infrastructure, that supports the movement of both people and goods, is a vital requirement to secure knowledge-intensive business investment and to grow indigenous companies of scale that can compete globally". The appropriate integration of land use and transport planning would strengthen the existing focal points of economic activity through the improvement of accessibility and through the optimal selection of locations for new employment growth.

The location of high density/trip-intensive uses should be focused on areas with high levels of public transport accessibility which in turn supports the provision of quality public transport services. It is important that these qualities are reflected in any such areas identified in the Draft Development Plan such as the proposed key district centres, key developing areas and economic corridors. A corollary of this is that all areas identified as focal points for development should demonstrate this attribute, in keeping with the NSS provisions to concentrate "development in locations where it is possible to integrate, employment, community services, retailing and public transport" (National Spatial Strategy, p103).

The Draft Development Plan’s Core Strategy specifies three economic corridors - Metro North, Southern and Naas Road corridor (Policy RE15, Objective RE01). Development within the economic corridors should be consistent with an objective to focus development at key transport nodes. Also, the scale and function of development should be consistent with planned accessibility levels.

Transport Investment and the City’s Development Potential

Large-scale public transport projects, provided for under Transport 21 and currently at various stages of planning, are a particularly important consideration in the preparation of a new Development Plan for the city. For this reason, the Draft Development Plan needs to take account of the impact of these projects on the development potential of the City, particularly in relation to their likely impact on the timing, location & density of development and traffic management during their construction. Related to this, in order to support and not to compromise the planned investment in transport infrastructure, it will be necessary to retain as a minimum, the Draft Development Plan’s density standards.

Of particular importance are the Interconnector and Metro North rail projects which will fundamentally alter the public transport landscape of the city in terms of accessibility levels from within the wider GDA / national level and emerging station / interchange locations, with consequent opportunities for intensification afforded by such locations, particularly in the city centre.

However, whilst a piecemeal approach to development in such areas around stations / interchanges may deliver an appropriate quantum of development and mix of uses, such an approach could, over time, reduce the potential for more holistic and
integrated development around important interchange and station locations. The NTA would recommend that the Development Plan include a policy which states that areas around the busiest interchange nodes and stations, such as Pearse Station, be guided by development frameworks for interchanges. Smarter Travel, *A Sustainable Transport Future* states that there is a "requirement that development in urban rail corridors be high density and appropriate for public transport use".

**Traffic Management**

The NTA will produce a strategic traffic management plan for the GDA. The NTA supports the objectives to produce the following plans – the Regional Traffic Management Strategy, the HGV Management Strategy and City Centre Transport Plan, and recommend that these are carried out on the basis of the NTA’s Strategic Traffic Management Plan. All these should meet the objectives of Government Policy as presented in *Smarter Travel*.

**Retail Hierarchy & District Centres**

*Function and locations of district centres*

The Draft Development Plan’s retail strategy designates thirty three district centres within the Dublin City Council area. Of the thirty three district centres, eight have been designated Key District Centres, including: Finglas, Northside, Ballyfermot, Rathmines, Ballymun, North Fringe, Naas Road and Phibsborough. Furthermore, the Retail Strategy for the Greater Dublin Area designates 10 areas within the Dublin City Council area as District Centres, which, in addition to those listed above, include Crumlin Shopping Centre, Donaghmede Shopping Centre, Omni, Ballymun, Point Village and Poolbeg.

Given the large number of district centres identified in the Draft Development Plan, further elaboration is required, setting out the basis for their functions, scale and locations, in particular, those designated below Key District Centre level. The relationship between all district centres and the City Retail Strategy also needs further clarification, particularly with regard to scale and catchments.

*District Centre Accessibility*

Given the Draft Development Plan’s support for the consolidation of development, the importance of accessibility by public transport, walking and cycling needs to influence the scale and location of the higher order centres outside of the City Centre.

As the locations of each of the eight Key District Centres demonstrate different levels of public transport accessibility, the relationship between accessibility and scale needs to be more clearly defined in the Draft Development Plan. For example, Ballymun is set to benefit from substantial improvements in accessibility by public transport, on completion of Metro North. However, other Key District Centres such as Northside would not be directly served by rail on the basis of projects included under Transport 21.
Conclusion

In conclusion, the general thrust of the Draft Development Plan is commended and the NTA looks forward to its submission being taken into consideration.

Yours sincerely,

[Signature]

Gerry Murphy
CEO