

**Senior Executive Officer, Planning Department
Fingal County Council
County Hall, Main Street
Swords, Co. Dublin.**

31st May 2011

Re: Draft Barryspark Local Area Plan

Dear Sir/Madam,

This is the National Transport Authority (“the Authority”) submission on the Draft Barryspark Local Area Plan.

Section 31E(1) of the Dublin Transport Authority Act 2008 assigns the NTA¹ a role in the making of a Local Area Plan. Where a notice is received by the NTA under section 20(3)(a)(i), it shall prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in making, amending or revoking a local area plan.

Among other issues, the such reports should address, the transport investment priorities for the period of the local area plan and recommendations regarding the optimal use, location, pattern and density of new development taking account of the transport strategy, and recommendations on the matters to be addressed in the local area plan to ensure the effective integration of transport and land use planning.

General Comment

The Authority supports the overall objective of the Draft Local Area Plan in that it:

- supports the consolidation of trip intensive development within a proposed rail-based public transport corridor;

¹ As amended by section 30(C) of the Public Transport Regulation Act 2009

- supports the delivery of the Metro North scheme; it supports the expansion of a designated town centre, focused on a public transport interchange node;
- provides a focal point for local bus, walking and cycling networks and fosters the use of bus for both local and non-local trips; and
- provides for the expansion of the town centre on a sequential basis, contingent on the delivery of critical supporting infrastructure.

Assessment of the Draft Local Area Plan against Draft Transport Strategy Measures

The Draft Transport Strategy for the Greater Dublin Area was recently subject to a public and stakeholder consultation process and the Strategy document will be finalised in the coming weeks. This will then be submitted to the Minister for Transport, Tourism and Sport for approval.

Whilst all of the measures presented in the Draft Transport Strategy are considered to be relevance, the following measures are considered to be of particular relevance to the preparation of local area plans and town centre development around public transport interchange points. The Authority's comments focus therefore, on an examination of the draft LAP's key objectives against these measures.

Measure LU1

... Focus person-trip intensive development, particularly key destination such as retail and offices into ... Designated Town Centres

Comment

The Draft LAP is consistent with this measure insofar as it provides for a public transport interchange as the focal point of an expanded town centre area and reduces the severance effect of the R132 in Swords, generally. There is also a strong focus on retail and office-based development, with the highest densities applied in closest proximity to the public transport interchange location.

Measure LU3

... Local Area Plans should ensure that

- There is a sequential approach to development whereby lands which are most accessible by public transport are prioritised for growth;
- Densities will be increased ... to support public transport, walking and cycling with the following considerations:
 - ... high densities ... at designated town rail stations;
- Mixed use development ...
 - In ... designated town centres and in areas around rail interchange points there will be a greater emphasis on commercial development;
- They coordinate with ... (government) policies to ensure there is (consistency) between the urban centres designated in future plans ... relating this directly to their local and strategic accessibility and particularly in relation to the provision of public transport;
- Local transport plans, as an integral component element of local area plans ... are prepared for each of the designated towns ... in consultation with the Authority

Comment

The Draft LAP does demonstrate a consistency with the above Measure LU3 in that it provides for a sequential approach to development contingent on the delivery of critical supporting infrastructure, development densities which are related to centrality within an expanded town centre and proximity to the proposed public transport interchange node and with a focus on commercial development.

The Authority notes that a transportation study has been undertaken to assess the impact of the proposed Barryspark development which was in turn based on the Swords Transportation Network Study undertaken in 2009. A mobility management plan for the town centre area would allow the opportunity to further elaborate on the details of the transport provision.

Measure LU4

- All non-residential development proposals ... should be subject to maximum parking standards.
- ... significantly more restrictive provision should apply in ... designated town centres and in areas of good public transport accessibility.
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.

Comment

In relation to parking provision and parking management, the Authority would support the development of “a multi-functioning car parking strategy, to ensure the optimum use of parking provision by ensuring multiple use of the same parking spaces for different uses at different times”.

Whilst it is stated that parking shall be provided in accordance with Fingal Development Plan standards, the Authority would recommend that the actual standards applied / level of constraint be determined on the basis of centrality with the town centre area, proximity to the Metro stop/Swords Plaza area, the extent to which parking can be shared between different uses, agreed mobility management plan mode split targets and the development densities permitted. As stated in the above Measure LU4, an overall cap on parking on an LAP-wide basis is also recommended.

In relation to the proposed Metro Box underpass, the NTA would support measures which allow for the separation of general vehicular movements from walking, cycling and public transport in the environs of the Swords Plaza area and in the town centre area, generally, on both sides of the R132/Metro North. The linking the parking provisions on both sides of the R132, should be undertaken in combination with a parking management strategy for the town centre as a whole.

In relation to interchange between public transport services, **Measure INT 4** states that the Authority will seek:

- The provision of high quality passenger interchange points between public transport services in ... town centres ...;
- ... providing safe and direct routes which do not require long waiting times to cross streets; and

- Provision of a high standard of direction signs to connecting services at interchange points.

In relation to rail nodes, **Measure RAIL 16** states that the Authority will seek ...:

- Stops, stations and trains that area fully accessible by mobility impaired and disabled people;
- Improved access by foot or on cycle from the surrounding area;
- Provision ... for associated bus stopping areas, taxi ranks and passenger drop off facilities;
- Provision of shelters ... well lit and with seating ...;
- ... security features for waiting passengers ...;
- Sufficient and secure cycle parking;

Comment

The proposed the Metro Plaza supports the above measures on the basis that it:

- Provides for a public transport interchange as the focal point of an expanded town centre area and reduces the severance effect of the R132 in Swords, generally;
- Facilitates accessibility to the Swords Metro stop by walking, cycling and bus;
- Supports the basis for the development of a more locally focused bus network and better integration between longer distance bus services operating along the R132 with Metro and local bus services;
- Provides for a high level of priority for bus movement into and through the town centre area, on both sides of the R132;
- Provides accessibility across the R132 for pedestrians, cyclists and bus;

The Metro Plaza is also consistent with the provisions of the Metro North Railway Order decision. As conditioned by An Bord Pleanala, a ground level signalised pedestrian crossing on the R132 has not been included in the proposal.

In relation to the various attributes set out in Measure Rail 16, these should be reflected in the design of the public transport interchange in its totality and should therefore inform the design of the Metro Plaza and its environs (i.e. in all areas where interchange activity occurs).

In addition, it is recommended that the LAP provide information on the location and design of cycle parking, bus set-down and taxi set down areas and waiting facilities/shelters.

Measure LU2

... Local Area Plans should ensure that

- All development areas provide for internal permeability for walking and cycling;
- ... design of new development areas provide for internal permeability for walking and cycling;
- The design of new developments incorporate new walking and cycling routes or exploit existing direct routes to social and commercial facilities in the central areas of designated towns broaden permeability within the wider area;
- Parking ... is located and designed ... that it does not dominate the streetscape and does not compromise walking, cycling and public transport;
- The provision for the delivery of goods and services is taken into account in the design of new ... development ...;

- Severance within local catchments ... is avoided ...;

In relation to walking and cycling, **Measure WCY 1** states that the Authority will seek:

- Restrictions on general motorised traffic ... (in) town centres, by diverting through traffic onto alternative routes whilst permitting through movement for buses, trams or taxis ... ; and
- The retention of access for town centre deliveries

Comment

The Authority considers that the Draft LAP does place a high priority on permeability for walking and cycling within the 'pedestrian/cyclist zone' as defined, representing the core of the LAP area. Critically, this Metro Plaza/public transport interchange area form part of this zone, so permeability between both sides of an expanded town centre area can be achieved.

As proposed in the Draft LAP, the Authority would agree that access to car parking areas should be located on the perimeter of the town centre area and that the town centre street network should be designed and managed as a traffic free zone. If provision needs to be made on these streets for good delivery, this should be limited to light service vehicles within specific time periods.

Measure WCY2 seeks inter alia, the reduction in traffic speeds in town centres and the application of a 30km/hr speed limit in the commercial and retail core of town centres, **Measure WCY3** seeks inter alia, improvements to walking and cycling routes approaching town centres and **Measure WCY 8** seeks the provision in Local Area Plans of direct, convenient and high quality pedestrian routes within new development areas and linking to the surrounding area and public transport access points.

In relation to transport demand management, **Measure TDM 4** supports inter alia, the introduction of workplace travel plans for all large employers in the Greater Dublin Area and the introduction of Residential Travel Plans, School Travel Plans.

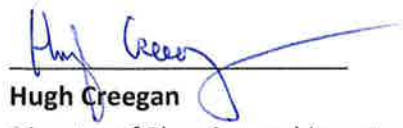
Comment

The Draft LAP places a high priority on the provision of walking and cycle routes, linking the Barryspark area with the existing town centre and with its local catchment within the south eastern quadrant of Swords. The design of the walking and cycling network should be informed by assumed desire lines relating to the town centre core area and other destinations, including bus stop locations.

The Authority would agree that mobility management plans (MMP) should be prepared for development within the LAP area. These MMPs should relate to all residential and commercial land uses. However, it is also recommended that a mobility management strategy be prepared for the LAP area as a whole, which would inform any site specific plans submitted with planning applications. This could be undertaken as part of the town centre's phasing and parking management strategy. Ultimately, the Authority would support the extension of such a mobility management strategy to relate to the town centre as a whole, on both sides of the R132. The Authority would welcome the opportunity to work with the Council in the preparation of the MMP.

The National Transport Authority requests your consideration of the above comments and would welcome the opportunity to discuss the delivery of some of the transport objectives in this plan, in particular, mobility management.

Yours sincerely,



Hugh Creegan
Director of Planning and Investment