Director of Planning,
County Hall,
Marine Road,
Dun Laoghaire.

7th February 2011


Dear Sir/Madam,

The National Transport Authority (NTA) submits the following report on the Sandyford Urban Framework Plan - Proposed Variation No. 2 of the Dun Laoghaire Rathdown County Development Plan 2010-2016 (hereafter referred to as the Draft Plan). The Dublin Transport Authority Act, 2008 (as amended) requires that the Authority consider whether proposed variations to development plans are consistent with the Authority’s Transport Strategy for the Greater Dublin Area. The Authority is currently finalising its draft Transport Strategy for public consultation and therefore the following comments are based on policies contained in the draft Transport Strategy.

The NTA welcomes the following principles in the Sandyford Urban Framework Plan:

- It provides for the phasing of development related to the provision of infrastructure and achievement of transport objectives,
- It focusses the highest density of development around the public transport interchange at the Stillorgan Luas Stop,
- It provides a framework for an improved environment for walking, cycling and public transport within the Plan area, and
- To achieve the plan objectives, it ensures a stricter control on the permitted land uses within the Framework Plan boundary.

Road Infrastructure
The NTA recommends that an additional qualifier should be included in the text of the following objectives: P3 and P4. This would ensure that these road proposals will be consistent with the draft NTA Transport strategy. The additional text should state the following:
Additional Text – Objective P3
Prior to the implementation of these road schemes, that consultation and review will be carried out with the National Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area.

Additional Text – Objective P4
Prior to the implementation of these road schemes, that consultation and review will be carried out with the National Transport Authority based on their adopted Transport Strategy for the Greater Dublin Area.

Car parking standards
The NTA recommends an area based approach to car parking standards for the entire Sandyford Business District. It is recommended that the maximum car parking standards for the area should not exceed the Dun Laoghaire Rathdown County Development 2010-2016 car parking standards for designated areas along public transport corridors. More restrictive standards must be applied at appropriate locations within the Plan area, such as areas proximate to the Luas/ Bus Interchange. This will help control congestion in the local and wider environs and encourage access by non-car modes.

Recommended Additional Car Parking Objective
“It is an objective of the Council that the maximum car parking standards for the entire Sandyford Business District will not exceed the Dun Laoghaire Rathdown County Development 2010-2016 car parking standards for designated areas along public transport corridors and more restrictive standards may apply at appropriate locations.”

Area Wide Mobility Management Plan
The scale of development in the Sandyford Business District should be determined by the level of accessibility by public transport to/from the Plan area. Smarter Travel includes work related car mode share target of 45% by 2020. As this is a national target, urban areas with good public transport will have to achieve lower car mode share target to compensate for more remote locations. It is critical, therefore, that new development in the Sandyford Business District should attempt to achieve a high mode share for public transport, walking and cycling (exceeding 55%). The NTA welcomes the proposal for the preparation of an area wide Mobility Management Plan which can assist in achieving sustainable transport objectives, by relating the scale and phasing of development to the provision of public transport infrastructure/services. A provision to prepare this plan in conjunction with the NTA is requested.

Recommended Additional Text – Objective P6
“This will be undertaken in consultation with the National Transport Authority”.

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Conclusion
The inclusion of these changes will address the NTA’s concerns in regard to the consistency of the Sandyford Urban Framework Plan with the NTA’s draft Transport Strategy and would enable the NTA to support the Sandyford Urban Framework Plan as aligning with the draft Transport Strategy.

I trust the above recommendations of the NTA will be addressed and would welcome the opportunity to discuss, should you have any questions relating to them.

Yours sincerely,

Hugh Creegan
Director of Transport Planning and Investment