

Acting Assistant City Manager
Planning Department,
Dublin City Council,
Block 4, Floor 3, Civic Offices,
Wood Quay,
Dublin 8.

28th August 2013

Re: North Lotts and Grand Canal Dock SDZ Draft Planning Scheme – *Proposed Amendments*

Dear Sir,

The National Transport Authority (the Authority) has the following comments to make on the proposed amendments to the Draft Planning Scheme.

Section 4.4. Movement

Previous Comments made by the Authority

In its previous submission, the Authority stated that “While it is welcomed that the draft planning scheme articulates in Section 4.4.4.3 (Travel Demand Management & Mobility Management) the need for limiting “*commuter parking*” and states that “[t]he maximum car parking standards set out in the City Development Plan should not, as a general rule be required for future commercial development in the Docklands area,” a clearer statement of the level of likely parking provision for commercial development, and for residential development, would be beneficial. Dublin City Council has successfully applied restrictive parking standards in similar city locations and it is suggested that a stronger commitment to minimising additional parking provision might beneficially be included in Chapter 4.4: Movement.”

Whilst the Manager’s Report on submissions, in response, confirms that a maximum standard of 1 space per 400 sq.m. would be applied for office, as per the Development Plan Standards and that states that “the scheme provides full clarity regarding the application of parking standards at objectives MV7, MV8 and MV9 and that no additional text is required”, these objectives refer only, to:

- the discouragement of commuter parking;
- to ensure the provision of adequate but not excessive parking provision for short term use;
- to provide appropriate levels of car parking in accordance with Development Plan standards;
- to provide for sustainable levels of car parking in residential schemes, in accordance with Development Plan standards

Whilst these are related back to the Development Plan’s Maximum Parking Standards, it nonetheless, still remains unclear what the level of likely parking provision would be. The Authority reiterates its support for the maximum standard of 1 space per 400 sq.m. but would also reiterate that a stronger commitment to minimising additional parking provision should be included in the Planning Scheme. Existing and future car parking within the Docklands area therefore needs to be managed to ensure that car based trips

generated by the SDZ area will not significantly increase above current levels given that, as stated in the draft planning scheme, “[t]he existing road network is running at capacity during the peak hours.” One approach to achieving this would be to determine the total quantum of parking on a local area basis, with parking provision for all development being provided for, both temporally and spatially, within the limits of a defined local area parking cap. This is also consistent with the criteria set out in Appendix 5, below.

Appendix 5 – Assessment Criteria for High Buildings (Transport and Movement Criteria)

The Authority would support the proposed amendment in that it underlines the importance of non-car modes in servicing high buildings and in any case the highest density development within the SDZ area and related to this, the relevance of layout (permeability) in facilitating this.

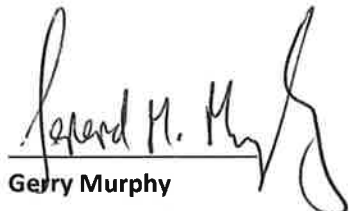
However, in stating that “All proposals for high buildings must ... Form part of an integrated movement strategy to reduce reliance on the use of private cars ...” and that “A Travel Plan may be required in this regard.”, these objectives would naturally apply to all development within the SDZ area, where the overall intensity of development, its central location within the City and the lack of available road network capacity to accommodate additional car trip generation, should determine that all additional development provided for in the SDZ area will, of necessity, have minimal reliance on the use of the private car.

Figure 14 Public Transport Map

In its previous submission, the Authority stated that “Certain lines are identified in the legend as “FUTURE DOCKLANDS RAPID TRANSIT/QBC”. This legend label should be changed to “POTENTIAL FUTURE DOCKLANDS RAPID TRANSIT/QBC” as the level of development of these proposals is still at an early stage.”

On examination of the revised Public Transport Map, it is noted that this recommendation has not been included.

Yours sincerely,



Gerard Murphy

CEO, National Transport Authority