

**Senior Executive Officer,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Swords,
County Dublin.**

1st November 2012

Re: Cherryhound Draft Local Area Plan.

Dear Sir/Madam,

The National Transport Authority (the “Authority”) welcomes the opportunity to comment on the Draft Local Area Plan for Cherryhound.

The Authority acknowledges the need for the provision of employment areas within the county of Fingal and recognises that the area which is the subject of the draft Local Area Plan has been zoned for “*general enterprise and employment*” in the Fingal Development Plan 2011 to 2017.

It is noted that the area involved in the LAP, amounting to some 240 hectares (593 acres), is substantial and that only a portion of such lands is likely to be developed over the period of the Local Area Plan. It is further noted that the plan envisages that the extent of employment that can be accommodated is stated to be a “*minimum of 9,000 new jobs*” and potentially “*significantly more than that number depending on densities achieved*”.

Our views in relation to this draft local area plan are set out below under the headings of:

- Overall view on development objectives;
- Development phasing;
- Development type and location; and

- Development at the N2 Junction.

Overall View on Development Objectives in Draft LAP

The level of employment anticipated for the lands the subject of this local area plan is very significant (upwards of 9,000). For significant employment areas within the Metropolitan Area, all relevant policy and guidance, including the Authority's draft GDA Transport Strategy and government guidelines on Spatial Planning and National Roads, emphasise that public transport accessibility needs to be a key factor in determining the scale, density and location of future development in the GDA.

Although Cherryhound is located within the Metropolitan Area and is associated with Blanchardstown Metropolitan Consolidation Town, it is not located on an existing or proposed rail or light rail corridor, and within its 20 year planning horizon, the draft Transport Strategy makes no provision for additional public transport infrastructure in the area.

As such, it is likely that development at this location, rather than building on and complimenting existing public transport services, would require additional dedicated services linking employment areas within Cherryhound to centres of population within the Metropolitan Area. However, proximity and facility of access to the national road network are likely to present a more competitive alternative for work related trips than any foreseeable public transport options that are ever likely to be feasible to operate in this area. This, in itself, would represent an inappropriate use of the national road network for non-strategic trip-making during the peak periods and as such would be inconsistent with Government guidelines on Spatial Planning and National Roads as well as the Draft Transport Strategy.

Overall the draft local area plan provides no guidance on the likely transport mode share that will arise from the development of these lands in accordance with the draft plan. However, it is our view that this development area is likely, under the current proposals, to be very much a car dependent area, with no prospect of achieving the Government's transport objectives as set out in Smarter Travel. The rationale for this view is elaborated further below.

Development Phasing

Having regard to the Authority's statutory functions of strategic transport planning, the development of an integrated public transport network and the effective management of traffic and transport demand, we are concerned over the

proposed approach to the development of the full area encompassed by this local area plan. We note the statement in section 3.9 of the plan statement that “[i]mproved bus services are essential to meet future travel demand.” However, we do not see that the plan has created that capability on an economically sustainable basis.

For public transport to play any meaningful role, it would be essential that a planned and phased rollout of the overall area would be put in place. Properly framed, that would allow the creation of sufficient critical mass to justify the delivery of scheduled bus services on a sustainable basis. While phasing is mentioned under section 6.1 of the plan, dividing the development into Phase 1 and Phase 2, it states that Phase 1 includes for:

- (a) Development of all of the lands to the south and east of the M3/N3 Link Road;
- (b) The Gateway Area adjacent to the M2 junction; and
- (c) All of the land areas identified for “nodal land uses”.

In addition, the plan states that “*certain developments may be permitted in Phase 2 in tandem with the development of Phase 1*”. Notwithstanding caveats that are included, the net result of the current plan proposal is that, in our view, virtually any area of the overall site, whether in Phase 1 or Phase 2, is capable of going to development at any time.

Overall this does not, in the Authority’s view, constitute a well controlled phased roll-out that allows a planned process of development delivery and builds out the area on a coherent integrated basis. Instead, there is a high risk, if not certainty, that a fragmented approach to development delivery is likely to emerge across this area. Such an approach of isolated islands of development, militates against the provision of public transport services, as it usually proves uneconomic to serve that form of non-consolidated development. The net result will be that this area will represent a high car dependency area into the future, which creates impacts and effects for a wider region than just the area covered by this plan.

Development type and locations

The development strategy provides for a very broad range of employment uses, ranging from office based to logistics. The Draft LAP indicates that higher intensity uses would be encouraged to locate in proximity to public transport services and within the node and gateway areas. However, it does not include specific public transport proposals other than an indicative bus route along the N2-N3 link road

with three bus stops. The provision of the necessary bus services to provide a reasonable level of public transport access to this area, can only be economically delivered if the pattern of development supports that provision. The report notes (section 4.3.1) that “[b]us services will respond to higher demand by increasing service, rerouting services or possibly introducing new routes”. While this is true in theory, in practice achieving the necessary additional demand to justify bus service provision is contingent on the correct development approach, which should, in our view, be based on a solid phasing mechanism.

In relation to the location of the more employment intensive uses adjacent to a national road interchange, it is considered that this is wholly inconsistent with both the Authority’s policies as presented in the Draft Transport Strategy and Government policy as set out in the guidelines on Spatial Planning and National Roads.

Development at the M2 Interchange

As stated earlier, the location of the more employment intensive uses adjacent to the M2 national road interchange is wholly inconsistent with both the policies as presented in the Draft Transport Strategy and in the Government guidelines Spatial Planning and National Roads and should, therefore, be excluded from the local area plan, particularly on account of the trip-intensive nature of the uses proposed.

In addition, the provision of a motorway service area in such proximity to Dublin City is not consistent with government guidelines, our policy as presented in the Draft Transport Strategy or NRA Guidelines.

Preferred Approach to Development in LAP area

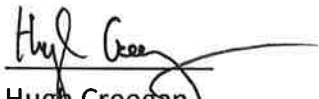
While the above sections have focussed on those areas of the current plan that cause us concern, the Authority does recognise and accept that the location and characteristics of the local area plan lands present potential for the development of logistics and distribution-related uses, but not for employment-intensive uses. In particular, it would be our recommendation that employment intensive uses be excluded, particularly on lands adjacent to the M2 interchange.

In our view it is more logical and coherent from a planning and transport perspective, to phase the overall area so that the lands to the south and east of the M3/N3 Link Road are developed initially, before the lands to the north and west of the M3/N3 Link Road are opened up. Ideally, this should be sub-phased such that development occurs in a sequential manner, starting from areas adjacent to the

existing employment lands to the south. This would encourage development to occur initially in areas that are contiguous with existing developed areas and provide a more appropriate platform for the introduction of supporting transport provision.

We recognise and acknowledge the very good work done by Fingal County Council in the general planning area and the collaborative interactions we have had with the Council, and regret that on this occasion we cannot support this local area plan proposal in its current form.

Yours sincerely,



Hugh Creegan

Director of Transport Investment and Taxi Regulation.