

Planning Department,
Dublin City Council,
Civic Offices,
Wood Quay,
Dublin 8.

11th December 2015



Harcourt Lane, Dublin 2

Dún Scéine, Baile Átha Cliath 2

tel: 01 879 8300

fax: 01 879 8333

email: info@nationaltransport.ie

web: www.nationaltransport.ie

Dublin City Draft Development Plan 2016-2022

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Dublin City Draft Development Plan 2016-2022. The Authority supports the general thrust of the Draft City Development Plan to consolidate development into areas served by public transport, and where walking and cycling are feasible for a variety of trip purposes. As such, the Authority will continue to cooperate with the City Council in order to optimise the level of residential, employment, education, and retail development in Dublin City.

Since the making of the Draft Development Plan, the Authority has published the Draft Transport Strategy (“the strategy”) for the Greater Dublin Area 2016-2035. It is anticipated that the strategy will be formally adopted in the coming months, in advance of the finalisation of the City Development Plan. Under Section 9 of the Planning and Development Act 2000 (as amended), Dublin City Council is required to ensure that its development plan is consistent with the strategy. The strategy comprises a suite of transport schemes and transport policies, including those related to the integration of land use planning and transport planning. Based on these schemes and policies, the Authority makes the following recommendations for ensuring the necessary consistency between the Development Plan and the strategy.

1. Strategy Transport Schemes

As part of the strategy the following transport schemes are proposed, which will impact on the Dublin City Council area:

- New Metro North;
- Metro South;
- DART Underground;
- Luas to Lucan;
- Luas to Finglas;
- Road link from Dublin Port Tunnel to the south port;
- Bus Rapid Transit (BRT) Network;
- Core Bus Network: and
- The GDA Cycle Network.

At present, the precise details of all of these proposals or networks are not available. While indicative alignments are set out in the strategy, clarity on exact routings, alignments, station and stop locations etc. will emerge over the lifetime of the Development Plan and subsequent plans. As such the Authority recommends that the indicative alignments are incorporated into the relevant maps which form part of the Development Plan, particularly Map J which already includes some of the proposals, and that policy statements are included in the Written Statement listing the proposals and stating that the indicative alignments will be protected from inappropriate development, encroachment, or development that would be inconsistent with the principles of land use and transport integration as set out in Chapter 7 of the strategy, and that, as prescribed bodies for planning matters in the Greater Dublin Area, the Authority – and Transport Infrastructure Ireland (TII) – will be consulted in relation to all significant proposals for development along these alignments.

Furthermore, in relation to the Eastern Bypass, the Authority recommends that the Development Plan reflects the findings of the TII “Corridor Protection Study Sector A – Dublin Port Tunnel to Sandymount Strand”, and that an objective to deliver the route is included in the Written Statement.

Related to this, the Authority recommends that the “Mixed Use” area, indicated on the map in section 15.1.1.9 Poolbeg West, is removed, as any development on this part of the SDRA in the short-medium term may compromise the route selection process and potential delivery of the Eastern Bypass, as well as the delivery of Luas to Poolbeg. Reference to BRT serving this area should also be removed, as there is no such objective in the strategy. The Authority also recommends that close consultation is undertaken between Dublin City Council, TII, and the Authority in any Masterplan process for Poolbeg West.

2. Development Plan Policies and Objectives

In relation to the policies and objectives set out in the Draft Development Plan, the Authority provides the following comments for consideration:

- a) Objective SCO1 could recognise the role of Luas Cross City in the enhancement of the public realm;
- b) Policy SC14 might recognise the economic requirement for intensive development, including high-rise, as a means to maximising the use of inner-suburban and city centre land in order to support investment to date in public transport and planned future investment;
- c) The Authority recommends that the proposals contained within the City Centre Transport Study are given greater expression in the Development Plan. While it is recognised that the proposals in the study have not yet been fully developed, the inclusion of these proposals, to the extent feasible, would be welcome;
- d) Objective MTO1 might also refer to proposed public transport infrastructure and services;
- e) Objective MTO12 should be prefaced with “In accordance with the Authority’s GDA Cycle Network Plan”;

- f) An objective to provide for permeability in existing urban areas in line with the Authority's "Permeability: A Best Practice Guide" should be included;
- g) Objective MT13 – to minimise the loss of on-street parking – should be removed as it could potentially conflict with the objectives of the Authority to deliver significant improvements to on-street public transport, such as the Core Bus Network, Bus Rapid Transit and Light Rail;
- h) Policy MT12 and Appendix 4 could reference NTA guidance on travel planning / mobility management, namely "Achieving Effective Workplace Travel Plans – Guidance for Local Authorities", "Workplace Travel Plans – A Guide for Implementers", and the "Toolkit for School Travel". The Written Statement and Appendix 4 might also state that School Travel Plans will be a requirement for all new schools;
- i) Objective MTO32 needs to reflect the fact that the making of a Regional Traffic Management Strategy is a statutory function of the National Transport Authority, under Section 64 of the Dublin Transport Authority Act, 2008; and
- j) Section 15.1.1.20 SDRA 17 Oscar Traynor Road should state that development of this site will complement the proposed BRT route from Dublin City Centre to Swords;

3. Summary

The above recommendations are intended to align the Dublin City Development Plan and the Draft Transport Strategy for the Greater Dublin Area 2016-2035 more closely. The Authority acknowledges that the general land use and transport policies and objectives set out in the Draft Development Plan will significantly contribute to the shared objectives of both agencies in terms of maximising use of public transport, walking and cycling for all trips, and look forward to on-going cooperation with the Council in the delivery of transport schemes and initiatives over the coming years, as well as in our role as a prescribed body for planning matters in the Greater Dublin Area.

I trust that the views of the Authority will be taken in to consideration by Dublin City Council in the finalisation of the City Development Plan.

Yours sincerely,



Hugh Creegan
Director of Transport Investment and Taxi Regulation

