Senior Executive Officer,
Planning and Enterprise Department,
Dun Laoghaire Rathdown County Council,
County Hall,
Marine Road,
Dun Laoghaire,
County Dublin

22nd December 2015

Re: Draft Dun Laoghaire-Rathdown County Development Plan 2016-2022 – Proposed Amendments

Dear Sir/ Madam,

The National Transport Authority ("the Authority") welcomes the opportunity to comment on the Proposed Amendments to the draft Dun Laoghaire-Rathdown County Development Plan 2016-2022.

Section 9 of the Planning and Development Act 2000 (as amended by the Dublin Transport Authority Act 2008) provides that each planning authority within the Greater Dublin Area (GDA) shall ensure that its development plan is consistent with the Authority’s transport strategy. Section 31C of the Dublin Transport Authority Act 2008 provides that where a notice is received by the DTA under section 12(1) it shall, as part of any written submission on the draft development plan, state whether, in its view, the draft development plan is-

(a) consistent with its transport strategy, or
(b) not consistent with its transport strategy and in such case what amendments to the draft plan it considers necessary to achieve such consistency.

The Authority has completed a draft Transport Strategy for the GDA for the period 2016-2035, and has completed a public consultation period on the draft Strategy. This will provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA.
In advance of the adoption of the Strategy, the Authority bases its observations on the draft Strategy. The Authority submitted its comments on the draft County Development Plan, on the 11th of May 2015.

**Car Parking Standards**
The Authority acknowledges that its request in the submission of 11th of May 2015 to maintain the maximum car parking standards for office use in designated areas along public transport corridors at 1 space per 100sqm has been achieved by amending the draft Plan, where Table 8.2.4 has been changed.

**Interchange**
The Authority acknowledges that its request in the submission of 11th of May 2015 to add Dundrum to the list of Public Transport Interchanges in Table 2.2.4 has been included, as it reflects the role envisaged for Dundrum as an interchange between Luas and Bus services.

**Bus Priority Measures**
A number of amendments have been proposed to be made to Section 2.2 ‘Sustainable Travel and Transportation’ of the draft Development Plan.


The renumbered Policy ST11 ‘Public Transport Improvements’ should also make reference to the Draft Transport Strategy for the Greater Dublin Area 2016-2035, rather than the previous draft Strategy. For the first paragraph of that policy, the following amended wording is suggested:

*It is Council policy to secure improvements to the public transport system as set out in ‘Smarter Travel, a Sustainable Transport Future 2009-2020’ and the NTA’s Draft Transport Strategy for the Greater Dublin Area 2016-2035, by optimising existing or proposed transport corridors, including the Core Radial and Orbital Bus Corridors identified in the NTA draft Strategy, and interchanges and by developing new Park and Ride and taxi rank facilities at appropriate locations.*

The renumbered Policy ST12 ‘Quality Bus Network’ should also make reference to the Draft Transport Strategy for the Greater Dublin Area 2016-2035, rather than the previous draft Strategy. (The Authority also requests that the renumbered policies ST13, ST15 and ST25 are updated in the same manner).

The Authority’s submission of 15th May stated that the draft Transport Strategy would include a Dublin Metropolitan Area bus infrastructure network, which would facilitate the concentration of bus infrastructure investment onto a limited number of radial and orbital bus corridors, and that “once the draft Transport Strategy is published, it may be necessary to amend the draft Development Plan to reflect the Authority’s proposed network”. Table 2.2.3 lists proposed bus
priority schemes. It is recommended that the first item on that table be amended to be described as follows:

*The Core Orbital Bus Corridors linking Dún Laoghaire and UCD to Dundrum and the Tallaght Area - as proposed in the NTA’s Draft Transport Strategy for the Greater Dublin Area 2016-2035.*

It is recommended that additional items be added to that table, after the above item, to be described as follows:

*That section of the Core Orbital Bus Corridor from Dundrum to the county boundary along the R112, as proposed in the NTA’s Draft Transport Strategy for the Greater Dublin Area 2016-2035;*

*A Core Radial Bus Corridor from the Cherrywood Area to Bray, via the Old Dublin Road, as proposed in the NTA’s Draft Transport Strategy for the Greater Dublin Area 2016-2035, and*

*A Core Radial Bus Corridor from Bray to UCD/Donnybrook, via the N11, as proposed in the NTA’s Draft Transport Strategy for the Greater Dublin Area 2016-2035.*

**Specific Local Objectives**

The Authority notes the amended SLO No. 6 regarding the Dublin Eastern Bypass Reservation Corridor, and the response of Transport Infrastructure Ireland on that item in its submission of 14th December 2015. The Authority supports the submission made by Transport Infrastructure Ireland on this item.

The Authority notes the inclusion of the additional SLO No. 148 regarding a Traffic Management Study for UCD & Environs to be prepared in conjunction with the Authority. The Authority is willing to co-operate with Dún Laoghaire Rathdown County Council and UCD on this matter, but its preference is for the objective to be worded as follows:

*To facilitate the ongoing process of Mobility Management planning for UCD, involving the University and the NTA, in order to achieve more sustainable travel patterns to and from the University, and to contribute to address car parking issues within the area.*

The National Transport Authority requests your consideration of the above comments.

Yours sincerely,

Hugh Creegan
Director of Transport Investment and Taxi Regulation