

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

11<sup>th</sup> May 2015

**Re: Review of the Dun Laoghaire-Rathdown County Development Plan 2010-2016 and the preparation of a new Dun Laoghaire-Rathdown County Development Plan 2016-2022**

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on 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 is preparing a draft Transport Strategy for the GDA for the period 2015-2035. This will provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA. The Authority anticipates that the draft Transport Strategy will be published in advance of the adoption of the Dun Laoghaire-Rathdown Development Plan,

after its consultation period has ended. As a result, it may be required to amend the draft Development Plan to be consistent with the draft Transport Strategy.

In advance of the adoption of the Strategy, the Authority bases its observations on Authority's general objectives and the Authority's Implementation Plan.

### **Core Strategy**

In the new Development Plan, the Core Strategy map sets out the future development areas within the Dun Laoghaire-Rathdown County Council administrative area. Currently, the Kiltiernan-Glenamuck Local Area Plan area and Old Conna Local Area Plan area have limited public transport options within short walking distance.

In relation to the Kiltiernan-Glenamuck Local Area Plan, much of the residential zoned lands are outside a reasonable walking distance of the Ballyogan Luas Stop. The Authority has no existing specific transport investment priorities for the Kiltiernan-Glenamuck area over the short to medium term and has no existing proposals to improve the frequency and capacity of the local bus services. However, the Authority is prepared to work with the Council to identify proposals to improve the public transport network in this area, as development occurs. This will require the identification of funding mechanisms to significantly increase the frequency and coverage of existing services operating from the Kiltiernan area.

In relation to the Old Conna Local Area Plan, much of the residential zoned lands are outside an 800m walking distance of frequent bus services on the Bray Road. The Authority has no current plans to introduce new local bus services serving the Old Conna area. The draft Transport Strategy will give clarity on the public transport strategy for the wider Bray area. Given the location of these lands to the west of Bray and adjacent the M11, the development of this area should be linked to the provision of public transport measures, that complement the provision of other public transport services in the wider Bray area.

### **Car Parking Standards**

In contrast to the Dun Laoghaire Rathdown Development Plan 2010-2016, there has been a reduction in the maximum car parking standards in designated areas along public transport corridors from 1 space per 100sqm to 1 space per 75sqm. The Authority has concerns with the potential increase in car parking spaces along public transport corridors, associated with new office development. The Authority requests that the 1 per 100sqm standard is retained for new office development. Flexibility may be given to a limited quantity of additional associated parking which is provided for in a remote location away from new office developments. This would allow the residual quantity of car parking to be provided off site and to be reduced over time, as wider public transport accessibility improves.

### **Interchange**

Section 2.2.8.4 Policy ST13 outlines locations for public transport interchanges in the Dun Laoghaire Rathdown administrative area. As a designated Metropolitan Consolidation Town and a major destination for peak and all day trips, it is necessary to ensure that Dundrum is served by a network

of public transport options and that it provides a high quality environment for those changing from one service to another. The Authority considers, therefore, that Dundrum will be a significant public transport interchange location in the Dun Laoghaire-Rathdown administrative area. The Authority recommends that Table 2.2.4 is updated to reflect this role.

#### **GDA Cycle Network**

The Authority welcomes the support for the development and implementation of the Authority's Cycle Network Plan for the Greater Dublin Area. The planned network, consisting of primary, secondary and Greenway routes, comprises a mix of cycle tracks and lanes, cycleways and infrastructure-free cycle routes in low traffic environments. This network will inform the Authority's investment in cycling in the Dun Laoghaire-Rathdown County Council area over the Development Plan period.

#### **Bus Priority Measures**

The draft Development Plan has identified proposals for quality bus priority schemes throughout the county and contains policies on public transport improvements (ST10) and the Quality Bus Network (ST11).

The Authority intends that the draft Transport Strategy will include a Dublin Metropolitan Area bus infrastructure network, which will facilitate the concentration of bus infrastructure investment onto a limited number of radial and orbital bus corridors. Once the draft Transport Strategy is published, it may be necessary to amend the draft Development Plan to reflect the Authority's proposed network.

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

Yours sincerely,



**Michael MacAree**

Head of Integrated Strategic Planning