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**Director of Planning and Strategic Infrastructure,
Fingal County Council,
County Hall,
Main Street,
Swords**

27th April 2016

Re: Draft Fingal County Council Development Plan 2017-2023

Dear Sir/Madam,

The Authority welcomes the opportunity to comment on the draft Fingal County Council Development Plan 2017-2023.

The Dublin Transport Authority Act 2008 provides that each planning authority within the GDA shall ensure that their Development Plan is consistent with the NTA Transport Strategy for the Greater Dublin Area (the 'Transport Strategy'). The Transport Strategy was approved by the Minister for Transport, Tourism and Sport in accordance with Section 12 of the Dublin Transport Authority Act, 2008 in February 2016.

A formal letter to Fingal County Council enclosing copies of the Transport Strategy for the Greater Dublin Area 2016-2035 has been issued to the Council, and the Transport Strategy is also available on our website at www.nationaltransport.ie/planning-policy.

Specifically, in relation to preparation of a development plan, Section 31(c) of the Planning and Development Act, 2000 states:

31C. — (1) 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.

(2) The DTA shall send copies of a submission prepared under this section to the Minister and the Minister for Transport.]

Overview

In general, the Authority supports the policies and objectives set out in the draft Development Plan, which align with the principles of the Transport Strategy, and will ensure that growth in Fingal is planned in an integrated and sustainable manner. The Authority would, however, draw attention to the following issues, which should be addressed to ensure consistency between the Development Plan and the Transport Strategy.

Reference to 'National Transport Authority'

Under section 11 of the Dublin Transport Authority Act, 2008, a principal function of the Authority is to 'secure the provision of public transport infrastructure'. In line with this function, it is the role of the Authority to develop and coordinate the implementation of new public transport infrastructure.

In this regard, the Authority requests that any reference to the development of new, or modifications to existing, public transport infrastructure references the 'National Transport Authority' as the statutorily responsible body.

Recommendation:

To ensure that the Development Plan accurately represents the legislative role of the Authority, it is recommended that the draft Plan is reviewed and revised to ensure that the 'National Transport Authority' is identified as the body responsible for the provision of public transport infrastructure. In particular, the Authority draws attention to the objectives set out in Chapter 7 of the draft plan, specifically, MT13, MT14 and MT18.

New Metro North

As noted in the draft Plan, a proposed new Metro North has been included in the Government's Capital Plan, to link Swords and the Airport to the City Centre. The process of planning and design for this project has now commenced. Part of that process will be the detailed consideration of various alignments and stop locations through the overall corridor, with the intention of optimising the final layout. For that reason it is suggested that the alignment for new Metro North shown on Sheet No. 8 and on Sheet No. 11, which is currently labelled as "New Metro North Route" be relabelled as "Indicative Route for new Metro North". In addition, the reference to TII in Objective MT13 should be amended to "NTA and TII".

Objective MT14 advocates support for a possible future extension of the new Metro North project to link with the Northern Rail Line in Donabate. It should be noted that this proposed extension has not been included in the Transport Strategy, which sets out the framework for transport provision across the Greater Dublin Area to 2035. In the absence of its inclusion in the Transport Strategy, this proposal should not form part of the transport proposals of the Development Plan. Accordingly, the Authority recommends that Objective MT14 is removed from the Development Plan.

In addition, it is noted that the alignment for new Metro North shown in Sheet 8 extends to Lissenhall. While it is proposed that the map legend be changed to "Indicative Route for new Metro North" it is also recommended that the indicative route terminates at Estuary Roundabout in line with the Fingal / North Dublin Transport Study.

Recommendation:

The Authority recommends replacing "TII" with "NTA and TII" in Objective MT13 and the replacement of the label "New Metro North Route" with "Indicative Route for new Metro North" on Sheet No. 8 and on Sheet No. 11. The alignment of the 'Indicative Route for new Metro North' should terminate at Estuary Roundabout and not Lissenhall.

The Authority also recommends the deletion of Objective MT14 as this is not supported by the Transport Strategy.

Metro West

The Transport Strategy sets out the programme for investment in strategic transport across the GDA to 2035. Metro West has not been included in the Transport Strategy, and as such it is not seen as a strategic transport priority for the Greater Dublin Area over the next 20 years. The Authority recommends that this section, including Objective MT15, is removed from the draft Development Plan.

Recommendation:

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy, the Authority recommends that the Chapter 7 section 'Metro West', including Objective MT15, is

removed from the draft Development Plan. The corresponding indicative alignment set out in the Map Sheets should also be removed.

General References to the Transport Strategy

The Transport Strategy now represents the principal policy context for transportation planning in the Greater Dublin Area. In this regard, the Authority recommends that the Transport Strategy is specifically referenced in Chapter 7: Policy Context alongside 'Building on Recovery: Infrastructure and Capital Investment, The National Spatial Strategy and The Regional Planning Guidelines for the Greater Dublin Area'. In addition, specific references should be cross checked to ensure consistency, e.g. Figure 1.2 references the old NTA Strategy- 2030 Vision.

Also, any reference within the document to *draft* Transport Strategy, should be replaced with Transport Strategy, in light of its approval by the Minister of Transport, Tourism and Sport.

Recommendation:

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy, the Authority requests that the Transport Strategy is referenced throughout the document as the principal regional transport policy document.

Use of 'Masterplans'

It is critical for the sustainable long term development of both County Fingal and the Greater Dublin Area that significant land use development is planned, and supported by an appropriate level of analysis. This will ensure that the development proposals are appropriate, consistent with statutory planning policy (including transport policy), and will complement existing and future infrastructural provision. In this regard, the Authority would stress the need to ensure that development planning is coordinated by the Local Authority in conjunction with relevant third parties, such as the NTA, TII, and Irish Water etc.

The Authority note that the DoECLG Local Area Plan Guidelines and the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that non- statutory 'Masterplans' can be regarded as supplementary or complementary to, *but should not replace statutory plans*. In this context, the Authority accepts the use of such non-statutory plans as an aid to development planning – *at non- strategic development locations*.

At locations of strategic importance, however, the Authority suggests that only statutory plans should be used to guide the build out of development. This will ensure that the planning of strategic locations is undertaken in a transparent and coordinated manner, with full consultation and direct

input from the statutory Authorities. This will facilitate a fully integrated approach to land use and transport planning, consistent with the objectives of the Transport Strategy.

The Authority does not support the use of Masterplans for strategic development sites, adjacent or in the vicinity of strategic public transport routes, in particular within the catchment of the proposed new Metro North corridor, and other primary public transport corridors. Specifically, the proposed planning approach used at the following locations should be reconsidered:

- Map Sheet 8 – Master Plan Objective 8A
- Map Sheet 8 – Master Plan Objective 8B
- Map Sheet 8 – Master Plan Objective 8C
- Map Sheet 8 – Master Plan Objective 8D
- Map Sheet 8 – Master Plan Objective 8E
- Map Sheet 8 – Master Plan Objective 8F
- Map Sheet 8 – Master Plan Objective 8G
- Map Sheet 11 – Master Plan Objective 11A
- Map Sheet 11 – Master Plan Objective 11D
- Map Sheet 13 – Master Plan Objective 13A

Due to the size, and location adjacent to the strategic road network, the Authority would also question the use of Masterplans for the following sites:

- Map Sheet 4 – Master Plan Objective 4C
- Map Sheet 7 – Master Plan Objective &A
- Map Sheet 11 – Master Plan Objective 11B
- Map Sheet 11 – Master Plan Objective 11C
- Map Sheet 12 – Master Plan Objective 12A

Recommendation:

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy, and that the development of strategic locations is undertaken in a planned and coordinated fashion, the Authority recommends that the use of Masterplans is restricted to non-strategic locations.

Lissenhall, Swords

The Authority acknowledges the proposal to prepare a Local Area Plan for the lands zoned at Lissenhall. Given the quantum of zoned land, it is critical that phasing and delivery of land use is carefully planned, and linked to the build out of public transport.

Recommendation:

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy, and that the development of Lissenhall is planned in a phased, sustainable and managed way, the

Authority recommends that an additional objective is included in Chapter 2 of the Development Plan. This objective should clearly state that future development within the Lissenhall LAP lands will be phased, and comply with the strategic and local planning principles outlined in Chapter 7 of the Transport Strategy.

Road Schemes

The Authority notes the road schemes put forward in the draft Development Plan. Although it is acknowledged that local road improvements will be required, it is critical that the road network is built out and managed in a coordinated and planned manner, across the GDA. In this regard, the Authority suggests that the plan provides that any future road proposal is assessed against the criteria set out in Section 5.8.3 of the Transport Strategy.

Recommendation:

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy, and the development of new road infrastructure is undertaken in a planned and coordinated fashion, the Authority recommends that the development plan should specifically reference Section 5.8.3 'Principles of Road Development' of the Transport Strategy in objective MT28 of the draft Development Plan. The Authority suggests the following wording:

Objective MT28

Seek to implement the road improvement schemes indicated in Table 7.1 within the Plan period, subject to assessment against the criteria set out in Section 5.8.3 of the NTA Transport Strategy for the GDA, and where resources permit. Reserve the corridors of the proposed road improvements free of development.

Strategic Road Network

It is critical that the capacity and efficiency of the existing strategic road network, including junctions, is preserved. The strategic road network is an integral part of the overall provision of transport within the GDA, and it is vital that capacity is reserved for strategic traffic movement, including freight movement. The Transport Strategy states that 'the strategic transport function of national roads, including motorways, will be protected by the full implementation of the Department of Environment, Community and Local Governments (DoECLG) guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'. The Authority recommends that Chapter 7 of the Development Plan incorporates this policy, and that any new development in the vicinity of the strategic road network shall be assessed in accordance with the policy and objectives set out in the DoECLG guidelines on 'Spatial Planning and National Roads'.

Recommendation:

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy, and that the strategic road network is maintained, managed and operated appropriately, the Authority recommends that an objective is included in Chapter 7 of the Plan, stating the strategic transport function of national roads, including motorways, will be protected by the full implementation of the DoELCG guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'.

Parking Control

The supply and management of parking at destinations is central to the management of travel demand. The Authority attaches critical importance to the need to manage parking, particularly in relation to workplace parking, and in this regard would be concerned that Objective MT04 could be misinterpreted as a requirement to provide 'long term parking within a reasonable distance for employees'. The Authority request that this objective is clarified based on the requirements of Section 5.11 of the Transport Strategy.

Recommendation:

To ensure that the Fingal County Development Plan is consistent with policies related to parking supply set out in the Transport Strategy, the Authority recommend that Objective MT04 is reworded to reflect the policies set out in Section 5.11 of the Transport Strategy.

Dublin Airport

The Authority views Dublin Airport as a strategic International Gateway, both in terms of the GDA and the country. It is critical that the primary function of the Airport as a Gateway is maintained, and that access to and from the airport is carefully managed to ensure that the strategic role of the Airport is not undermined by local transport problems.

The Authority welcomes the proposal in the draft Development Plan to prepare a Local Area Plan for the Airport and environs. This will guide the long term development of this strategic location and ensure that future growth is managed in line with the future provision of transport. This is in line with the principles of the Transport Strategy.

Recommendation:

To ensure that the primary function of the Airport is preserved, the Authority suggests that Objective ED31 is amended to emphasise the importance of protecting the operation function of the airport, rather than ensuring the appropriate balance is achieved. The Authority suggests the following wording.

Objective ED31

Protect the core operational function of Dublin Airport as the Country's main international airport, and ensure that any associated development does not undermine the performance of this core function.

Sustainable Transport – Cycling

In relation to cycling infrastructure, the Authority suggests that the policies set out in the Development Plan could be strengthened. In relation to Cycle Parking, the Authority suggests that the Walking and Cycling Section is broadened to better reflect the quality of facilities required to make cycling an attractive travel option to work and education. By way of example, the Authority recommends that the County Council review the corresponding section from the Dublin City Development Plan (section 17.41) with a view to replicating the approach in the Development Plan. Section 17.41 of the Dublin City Development Plan has been included in Appendix 1 for reference.

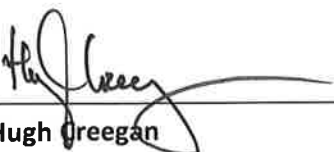
The Authority also recommends that a policy is included in the Development Plan which states that new / retrofitted cycle infrastructure within the county will be designed in line with the preferred approaches outlined in the NTA's National Cycle Manual.

Recommendation:

To ensure that the Development Plan fully supports the promotion of cycling as a transport mode in line with the policies of the Transport Strategy, the Authority recommends the inclusion of more prescriptive details of what types of cycle infrastructure should be provided.

I trust that the views of the Authority will be taken into consideration.

Yours sincerely,



Hugh O'Regan

Director of Transport Investment and Taxi Regulation

17.41 CYCLE PARKING

(see section 5.1.4.4)

Secure cycle parking facilities shall be provided in new Public Transport Interchanges, office blocks, apartment blocks, shopping centres, hospitals, etc., in accordance with the standards set out in Table 17.2. Bicycle Parking Stations should be provided in strategic new Public Transport Interchanges. Secure bicycle racks shall be provided in all cases where bicycle parking is deemed to be necessary by the planning authority. Such racks should be within 25m of a destination for short-term parking (shops) and within 50m for long-term parking (school, college, office). All long-term (more than three hours) cycle racks shall be protected from the weather.

All on-street stands or racks should be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism. Off-street storage/parking facilities should provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision.

Guidance for selecting the most appropriate type of bicycle parking facility depending on location and user needs is outlined in the National Cycle Manual. 'Bicycle Parking Facilities' Dublin City Council will have regard to this document when considering applications where bicycle parking is a requirement.

17.41.1 Multi-Storey Car Parks and Cycle Facilities

All cycle facilities in multi-storey car parks will be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park.

17.41.2 Location of Cycle Stands

Cycle parking facilities will be conveniently located, secure, easy to use, adequately lit and well signposted. Weather protected facilities should be considered where appropriate. In addition, parking should be placed within a populated, well supervised area, and monitored by CCTV where possible.

17.41.3 Security

Cyclists should be able to secure both frame and wheels to the cycle parking stand. Secure cycle compounds should be provided where feasible and in particular in large office developments, multi-storey car parks and railway stations.

17.41.4 Shower and Changing Facilities

Suitable shower and changing facilities will be made available in large-scale developments incorporating high amounts of cycle parking. Facilities should be secure, lockable and located in well-lit locations. The following standards shall be adhered to:

- 1 shower per office development over 100sq.m (approximately 5 employees)
- A minimum of 2 showers for office developments over 500sq.m (approximately 25 employees).
- 1 shower per 1000sq.m thereafter
- Changing/drying areas, toilets and lockers should be provided in association with shower facilities.

17.41.5 Lockers

The number of lockers provided should relate to the number of cycle parking spaces. Lockers should be well-ventilated, secure and lockable. Lockers that facilitate multiple short-term users are recommended.

17.41.6 Financial Contributions

In exceptional circumstances, where cycle parking cannot be incorporated into the development, the developer will be required to pay a financial contribution in lieu of providing the cycle parking. Where a developer is unable or does not wish to provide the specified number of cycle parking spaces on site, a financial contribution in lieu will be required towards the cost of providing such spaces off the site, where such a relaxation is deemed appropriate by the planning authority. Such a contribution will be set at €400 for each cycle parking space, or as amended by the Dublin City Council Cycling Strategy.