

Bernie Mills,  
Planning, Property, Enterprise and  
Economic Development Department,  
Block 4,  
Floor 3,  
Civic Offices,  
Wood Quay,  
Dublin 8

29<sup>th</sup> September 2015

**Re: Draft Phibsborough Local Area Plan**

Dear Ms Mills,

The National Transport Authority (the “Authority”) submits the following comments on the Draft Phibsborough Local Area Plan (LAP).

**Strategic Principles**

The Authority is fully supportive of the plan’s objective to provide for the “consolidation and coherent growth” of Phibsborough due to its relatively central location and potential to be served by existing and future high-capacity public transport services. This is wholly consistent with the Authority’s key principles for the integration of land use and transport as set out in section 5.3 of the Integrated Implementation Plan 2013-2018.

**Strategic Transport Policies and Plans**

*Integrated Implementation Plan 2013-2018*

The Authority welcomes the commitment given in Objective MT1 to support the Implementation Plan and the transport infrastructure projects contained therein. The Authority recommends that the LAP also makes reference to the principles for the integration of land use and transport as set out in section 5.3, in order to highlight the manner in which development at this location can meet the shared strategic objectives of the Authority and Dublin City Council.

*Dublin City Centre Transport Integration Study*

This NTA / DCC Joint study, currently being finalised after a round of public consultation, identifies the requirement to remove through traffic from Dublin City Centre. While some of this through traffic will divert at more peripheral locations – beyond the M50 and within the outer suburbs – it is still likely that additional demand will be placed on orbital routes close to the city, such as the North Circular Road and Cabra Road. It will be necessary, therefore, in the implementation of the LAP, to consider how best to balance the requirement of residual through-traffic with the objective to enhance the public realm and facilitate pedestrians, cyclists and public transport movement, with priority given to the latter modes in line with prevailing policy. Achieving this balance will be a matter for both Dublin City Council and the Authority.

## *The Transport Strategy for the Greater Dublin Area 2015-2035*

The Authority is currently in the process of making a new Transport Strategy for the Greater Dublin Area for the period 2015 to 2035. While this strategy has yet to be published in draft form, and is unlikely to be approved by Government in advance of the adoption of the LAP, the Authority recommends that the LAP commits to its implementation at the local level. This relates mainly to safeguarding the future investment in transport infrastructure in Phibsborough, set out in more detail in the following section.

### **Future Transport Infrastructure**

#### *Luas Cross City*

Luas Cross City is currently under construction with an opening date of Q4 2017. The Authority recommends that the objectives of the Local Area Plan complement and support this scheme, by way of facilitating the timely delivery of development on the key sites, particularly the redevelopment of Phibsborough Shopping Centre and the site on North Circular Road adjacent to the Luas alignment, and that accessibility to the two Luas stops within the plan lands, as well as those stops close to the plan area – Broadstone and DIT Grangegorman – is maximised for pedestrians and cyclists, through the preparation of a permeability strategy for the plan lands.

#### *Phoenix Park Tunnel Line*

The Authority intends to provide passenger services on the Phoenix Park Tunnel line from the second half of 2016. As stated in our submission on the Issues Paper, the re-opening of this line gives rise to the possibility of additional stations being provided on the line at Cabra and / or Cross Guns Bridge, with associated opportunities for interchange with Luas Cross City and bus routes connecting both Finglas and Ballymun with the City Centre. The Authority therefore welcomes Objective CG2 in relation to a station at Cross Guns. While this is not part of the Authority's current program, it should not be precluded as a future scheme by development of the sites at Cross Guns Bridge.

#### *Other Schemes*

There are a number of other transport schemes which are likely to be included in the Transport Strategy which will impact directly on accessibility to Phibsborough, including enhanced quality Bus corridors and other projects.

In advance of the detailed design and construction of these schemes, the Authority recommends that an objective is inserted into the LAP, similar to that recommended for Luas Cross City above, which states that development on the key sites which would support and complement schemes contained in the forthcoming Transport Strategy, is carried out in a timely fashion and that accessibility by walking and cycling to proposed stops and stations, both within the plan area and close to the plan area, is maximised.

### **Other Transport Considerations for the Local Area Plan**

The Authority welcomes the overall thrust of the LAP in seeking to improve the local environment for pedestrians and cyclists, and further recommends that clear objectives are inserted into the LAP which state that land use and transport development in Phibsborough will be consistent with the following policies and guidelines:

- National Cycle Manual;
- Greater Dublin Area Cycle Network Plan;
- Achieving Effective Workplace Travel Plans – Guidance for Local Authorities;
- Workplace Travel Plans – A Guide for Implementers; and
- Permeability – A Best Practice Guide

I trust the views of the Authority will be taken into consideration in the finalisation of the Local Area Plan.

Yours sincerely,



**Michael MacAree**

***Head of Planning and Data Analysis***

