

Senior Executive Officer,  
Forward Planning Section,  
Land Use, Planning and Transportation Department,  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24

24<sup>th</sup> September 2015

**Re: South Dublin County Council Draft Development Plan 2016-2022**

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the South Dublin County Council Draft Development Plan (the “Draft Plan”) 2016-2022.

In our submission at the pre-draft stage, the Authority outlined its view of the transport investment priorities for the County over the lifetime of the Development Plan; made recommendations in terms of the closer integration of land use and transport; and made further specific recommendations related to the Pre-Draft Public Consultation Background Issues Papers. In general the Authority is satisfied that, to a large extent, the Draft Plan has taken this submission into account; accords with the principles of land use and transport integration; and is broadly consistent with the plans and programmes of the Authority.

There are a number of areas within the Draft Plan where the relationship between land use and transport could be strengthened by amending or removing certain policies and objectives, as follows.

**Land Use Zoning**

The Authority welcomes the approach taken by the Council in terms of land use zoning. The use of a new REGEN zoning as a means of reaching housing targets without recourse to any significant new greenfield development is one which accords fully with the principles of proper planning from a transport perspective. The Authority recommends that a further policy is inserted, which states that in the making of Local Area Plans or Masterplans for these locations, that the road networks will be revisited in full, in order to reflect the changing nature of the lands from industrial to residential,

where applicable. This will ensure that the implementation of urban design and transport planning objectives related to the design, layout and utility of the road network for all users is facilitated, in particular.

### **Educational Facilities**

While the Authority welcomes the objectives related to travel to school as set out under Policy C9, it is recommended that a further objective is inserted which states that all new schools and extended schools adopt, implement and monitor school travel plans, undertaken with reference to the NTA's School Travel Toolkit or under the auspices of the Green Schools Travel programme, and that such plans are conditioned as part of a grant of planning permission. Such a policy is necessary in order to demonstrate consistency with the published plans and programmes of the Authority.

### **Economic and Tourism**

It is recommended that ET Policy 6 and the action thereunder acknowledges the role of the Authority as the funding agency for the delivery of the Greenway element of the GDA Cycle Network, including those greenways along the River Dodder and Grand Canal.

### **Transport and Mobility**

It is recommended that section 6.1.0 sets out the statutory role of the Authority in long-term strategic transport planning in the Greater Dublin Area and in the administering of the Government's capital investment programme, including the Sustainable Transport Measures Grants programme. It is also recommended that reference is made to "Local Traffic Plans" as provided for in Section 65 of the Dublin Transport Authority Act.

In terms of public transport, TM Policy 2, and the actions thereunder, the Authority, while acknowledging the remit of the Council to pursue any objectives as it deems appropriate, wishes to highlight the following:

- No possible future extension of BRT from Tallaght to Dundrum / Sandyford has been identified; and
- The feasibility and desirability of a new heavy rail line between Tallaght and Saggart is not clear and is not being considered by the Authority.

In relation to TM Policy 3, Walking and Cycling, the Authority recommends that the wording "...in line with the NTA's Greater Dublin Area Cycle Network Plan", or a phrase to that effect, is added to Objective 1. Objective 2 could also now make reference to the NTA publication "Permeability: A Best Practice Guide", undertaken in collaboration with South Dublin County Council, published recently. The latter comment also applies to Section 6.3.2.

Notwithstanding the policy and objectives outlined in Section 6 with regard to improving permeability generally, the Authority suggests that specific reference is made in relation to access and permeability to Luas stops. It is recommended that an additional objective should be included in the Development Plan, to undertake a study which specifically addresses permeability issues and access arrangements in the vicinity of Luas stops. This study should be undertaken in partnership between SDCC, NTA and Transport Infrastructure Ireland (TII), and should inform the Actions set out in Section 6.3.

## **Roads**

The Authority has some concerns over the following roads proposals, as set out in the points below:

- Esker Lane / N4 junction reopening – this scheme could potentially have a negative impact on public transport movement along the N4 and adversely affect the operational capacity of the national road in the performance of its primary strategic function;
- Junction 8 M50 – re-establishment of junction 8 – the M50 does not have sufficient spare capacity to cater for an additional junction at this point and this objective runs contrary to national policy to protect investment in the national road network;
- Oak Road Extension – the creation of a new junction on the Naas Road, as implied by this scheme may have a significant adverse impact on public transport movement by bus and tram at this point. This scheme would have to demonstrate that such an impact would not arise, and would not add significantly to radial road capacity inside the M50, in order for the Authority to consider it consistent with our plans and programmes;
- Tandy's Lane / N4 junction reopening – this scheme could potentially have a negative impact on public transport movement along the N4 and adversely affect the operational capacity of the national road in the performance of its primary strategic function;
- Tay Lane / N7 junction reopening – this scheme could potentially have a negative impact on public transport movement along the N7 and adversely affect the operational capacity of the national road in the performance of its primary strategic function, and
- Kennelsfort Road / R148 grade separation – the Authority has some concerns that this scheme may increase radial road capacity inside the M50, which would not be in accordance with established policy. Accordingly, it would be necessary to demonstrate that this upgrade would not have such an impact.

## **Road and Street Design**

The Authority recommends that TM Policy 6, and the actions thereunder, make reference to the National Cycle Manual.

## **Cycle Parking**

The Authority welcomes the provision of minimum cycle parking standards and the level at which they have been set. It is recommended that, in the case of schools, the distinction between Long Term and Short Stay is set aside, as student parking would not be considered Short Stay.

## **Car Parking**

The Authority welcomes the introduction of maximum parking standards, applicable throughout the County for the first time. The introduction of a zonal system is also welcomed. We would like to take the opportunity to emphasise that it is the manner in which these standards are implemented which is critical to their success or otherwise. As such, the Authority recommends that a further policy is inserted into the plan, which states that applications of a certain scale (such as those which require a Workplace Travel Plan as set out in NTA guidance and given effect via Table 11.25 of the Draft Plan) will have to demonstrate clearly the rationale for the application of the maximum standard rather than a reduced level of provision – particularly for applications for development in Zone 2. Such a policy would be consistent with the statement in the Draft Plan to the effect that these standards should not be viewed as a target.

## **Presentation and Maps**

The Authority recommends that a map showing where Zone 2 parking standards will apply is included in the final plan. It is also recommended that the land use zoning maps include clear symbols for rail stations and Luas stops.

The National Transport Authority requests your consideration of the above comments and would welcome further discussion and cooperation in the finalisation of the Draft South Dublin County Development Plan.

Yours sincerely,



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**Michael MacAree,**  
**Head of Planning and Data Analysis**