

Planning Department,  
Dublin City Council,  
Civic Offices,  
Wood Quay,  
Dublin 8.

14<sup>th</sup> January 2015

## **Re: Dublin City Development Plan 2016-2022 – Issues Paper**

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Dublin City Development Plan 2016-2022 – Issues Paper.

Section 31B(1) of the Planning and Development Act 2000<sup>1</sup> assigns the Authority certain functions in the preparation of a development plan. Where a notice is received by the Authority under section 11(2) it is required to prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in the review of its existing development plan and the preparation of a new development plan.

Among other issues, such reports should address the following:

- (a) the transport investment priorities for the period of the development plan,*
- (b) the scope, if any, to maximise the performance of the transport system by effective land use planning, and*
- (d) recommendations on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.*

The National Transport Authority (the Authority) therefore submits the following observations on the making of the Draft Dublin City Development Plan 2016-2022, and on the material presented in the Issues Paper.

### **Dublin City Centre Transport Integration Study**

The Authority recommends that the content of the above study – to be completed and published in Q1 2015 – is fully integrated into the Draft City Development Plan. As such, the transportation and public realm measures outlined in the study should – in their entirety – be set out as clear and

---

<sup>1</sup> As inserted by Section 95 of the Dublin Transport Authority Act 2008

unequivocal objectives of the City Council. The Authority will continue to work closely with the Council in order to complete this study and to implement it in full, subject to funding.

### **Transport Investment Priorities**

This section deals with transport investment priorities for the period of the Dublin City Development Plan. The Authority's Integrated Implementation Plan sets out an infrastructure investment programme which identifies the key regional objectives and outputs to be pursued by the Authority from 2013-2018, while the ongoing work between the Authority and Dublin City Council on the Sustainable Transport Measures Grants Programme comprises the implementation of these objectives on a local scale on a rolling annual basis. The next Government Capital Investment Programme and Greater Dublin Area Transport Strategy will also frame investment in Dublin City over the period of the Development Plan. Certainty as to the content of these documents is not likely to emerge until later in 2015.

In advance of the next capital programme and transport strategy, and based on the plans which are currently in force, the Authority requests that the new Dublin City Development Plan 2016-2022 facilitates the priorities and objectives of the Authority which are set out below.

### ***GDA Cycle Network***

The Greater Dublin Area Cycle Network Plan was published in April 2014. The planned network, consists of primary, secondary and Greenway routes (through parks, along waterways etc.), and comprises a mix of cycle tracks and lanes, cycleways and infrastructure-free cycle routes in low traffic environments. This plan will inform the next decade of NTA investment in cycling across seven local authority areas in the region.

The Authority requests that those elements of the GDA Cycle Network Plan which apply to Dublin City are reflected in the new Development Plan, with particular reference to the primary routes 1-13, and the proposed greenways in the city as follows:

- Santry River Greenway
- Tolka Greenway
- N2 – Royal Canal Greenway
- N5 – East Coast Trail
- Liffey Greenway
- Camac Greenway
- Dodder Greenway
- Poddle Greenway
- Grand Canal Greenway
- East Coast Trail

### ***Bus Rapid Transit (BRT)***

Throughout 2014, development work on a Bus Rapid Transit network for Dublin has been ongoing. In the first quarter of the year, the Authority published a proposed network and invited comment from the public and stakeholders. Routes through the City Centre from Swords to Earlsfort Terrace, Blanchardstown to UCD and Clongriffin to Tallaght were all proposed as part of this exercise, with an

emerging preferred route through the functional area of Dublin City Council put forward for each one.

While the priority route, subject to the most recent public consultation exercise, is that which runs from Swords to the City Centre via the Airport, it is the intention of the Authority to bring forward both the Tallaght-Clongriffin and Blanchardstown-UCD routes during the lifetime of the next Dublin City Development Plan.

The Authority therefore requests that the Bus Rapid Transit options as presented to the public in Q1 2014, and in Q4 2014 for the Swords-City Centre route are reflected in the City Development Plan, in the following manner:

- That land use policy within the catchment of the proposed routes reflect the potentially enhanced public transport capacity by permitting a higher intensity of development on any brownfield or greenfield sites along the corridor than that which may be permitted at present;
- That any such development along the route is carried out in such a manner as to enable the construction and operation of a BRT in the future. The Authority would welcome consultation in this regard; and
- That any transport interventions proposed along the corridor take a future BRT line into account and, similar to land use developments, will enable the construction and operation of such a facility in the future.

### ***Passenger Rail***

The Authority intend to complete the City Centre Resignalling Programme, allowing additional DART services through the city centre, and to commence operating passenger rail services through the Phoenix Park Tunnel by Q2 2016. These measures will deliver a significant benefit for those living along all rail lines within the city. The Authority recommends that complementary land use policies are strongly pursued to ensure that residential development is prioritised along rail corridors at Clongriffin, Pelletstown and Park West / Cherry Orchard, and that high-intensity commercial development remains focussed on the hub of the rail network in the city centre.

### **General Land Use Recommendations**

In addition to the specific recommendations in the preceding section related to development along rail and BRT, this section deals with the scope to maximise the performance of the transport system by effective land use planning on a city-wide basis.

The Authority's Integrated Implementation Plan outlines the key principles for the integration of land use and transport and the Authority requests that these principles are reflected in the objectives of the Development Plan, as amended as follows:

- High volume, trip intensive developments, such as offices and retail, should primarily be focussed into the city centre;
- The role and function of district centres and neighbourhood centres should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations;

- All non-residential development proposals should be subject to maximum parking standards and should vary spatially on the basis of centrality and the level of public transport provision, as is currently the case in the City Development Plan;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be considered;
- For all major employment developments and all new and extended schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with NTA guidance documents – “Toolkit for School Travel” and “Workplace Travel Plans – A Guide for Implementers”. The Development Plan should contain a clear policy reflecting this requirement;
- Residential development located proximate to high capacity public transport, such as Luas, commuter rail and proposed BRT, should be prioritised over development in less accessible locations;
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport - including infill and brownfield sites - are prioritised;
- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools through, for example, the application of density gradients across development areas whereby high-density development is focussed on centres and public transport with medium-low density development further away;
- New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods. Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips. This would give a competitive advantage to these modes and encourage their use as an alternative to the private car; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous walking and cycling trips for local residents accessing public transport, or local destinations.

### **Further NTA Response to Issues Papers**

In addition to the comments above, the Authority submits the following in response to the Background Issues Papers published as part of this pre-draft public consultation exercise.

#### ***Shaping the City***

The Authority fully supports the City Council’s position on the need to intensify development in the city. In terms of building height, while taller buildings do not necessarily always deliver higher intensities of development, the Authority would caution against height restrictions on brownfield sites within the city centre, particularly in the Docklands and the area around Heuston Station. Any such restrictions may compromise the economic vitality of the city and lead to development occurring in adjacent local authorities where such restrictions may not arise. This would contravene the principles of proper and sustainable integrated land use and transport planning.

In relation to vacant land, the Authority supports the re-use and/or redevelopment of such sites – particularly along existing and planned rail, light rail, BRT and QBC lines – to the maximum extent possible.

### ***Movement and Transport***

In addition to the specific comments above, the Authority makes a number of recommendations in relation to the movement and transport section of the Development Plan as follows:

- A clear policy stating that the implementation of transport and public realm measures in the city council area will reflect the hierarchy of road users as follows:
  1. Pedestrians
  2. Cyclists
  3. Public Transport Users
  4. Goods Vehicles Movement
  5. Taxi users
  6. Private Car Drivers
  
- A commitment to deliver comprehensive programmes of public cycle parking in the city centre and district and neighbourhood centres in the short-term, with an immediate focus on the city centre, in conjunction with the NTA;
- A clear objective stating that Travel Plans or Mobility Management Plans should form part of major development proposals in line with published NTA guidance on same, and that the City Council will seek to engage applicants with the Smarter Travel Workplaces, Campuses and Green Schools programme, where applicable;

To conclude, the Authority looks forward to working closely with Dublin City Council in the completion and publication of the City Centre Transport Integration Study and in the development and implementation of the City Development Plan, subsequent Local Area Plans, planning schemes and various transport proposals through the Sustainable Transport Measures Grants programme, the emerging Government Capital investment Programme and GDA Transport Strategy, and trust that the City Council will take our views into account in the making of the Draft Dublin City Development Plan.

Yours sincerely,



**Hugh Creegan**

***Director of Transport Planning and Investment***