

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

20th July 2016

Proposed Amendments to the Dublin City Draft Development Plan 2016-2022

Dear Sir / Madam

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

Since the Authority’s submission on the Draft Development Plan, the Transport Strategy for the Greater Dublin Area 2016-2035 (the “**Transport Strategy**”) has been approved by the Minister for Transport, Tourism and Sport. Under Section 9 of the Planning and Development Act (as amended), Dublin City Council is required to ensure that its development plan is consistent with the Transport Strategy. In order to ensure this consistency, the Authority makes the following recommendations, which are set out according to the reference numbers used in the Amended Draft.

1. Reference Number 8.3

In this section the Transport Strategy is referenced as setting a target of 30% mode share for walking and cycling for the region. While the Transport Strategy does seek, and will achieve, significant increases in walking and cycling, it does not state this specific target. Nor does the “Dublin City Centre Transport Study” set out mode share targets, although it is focussed on changing mode share patterns.

Accordingly, the Authority recommends that the references to targets being stated in those documents are removed and replaced with either a separate stand-alone target or a qualitative objective.

2. Reference Number 8.5

The Authority acknowledges the proposed bullet point insertion in section 8.4 relating to the Dublin City Centre Transport Study.

In addition to this bullet point, consideration should be given to the insertion of a specific objective of Dublin City Council to implement the proposals set out in the Dublin City Centre Transport Study. If this is considered too wide-ranging an objective, then a listing of the specific measures from that Study that are intended to be implemented should be stated.

Finally in this section, references to RPA should be changed to TII (Transport Infrastructure Ireland).

3. Reference Number 8.9

The Authority recommends that “in the longer term” is removed from this amendment, as the design, planning and, in some cases construction of the Transport Strategy proposals will be commenced within the lifetime of the Development Plan. It is also recommended that “is guided by” is replaced with “must be consistent with” in order to reflect the legislative status of the Transport Strategy, and reference to DART Underground should be replaced by reference to the “DART Expansion Programme” which includes both DART Underground and the associated, and necessary, electrification extensions.

In the amendments to Map J, the future projects (BRT routes, Luas, Metro, DART Expansion) should all be qualified in the legend by footnote stating that the details shown are “*Indicative and subject to design development*”.

4. Reference Number 8.11

In relation to the new sub-section (ii) of MT05, it is recommended that the following is added at the start of the insertion “*Subject to a station layout assessment,.....*”

5. Reference Number 8.12

In relation to MT06A, it is recommended that the following is added at the start of the insertion “*Subject to an economic assessment,*”

6. Reference Number 8.15

The Authority does not support the complete removal of this Policy. It is recommended that a revised wording is used instead, along the lines of the following:

“To assess on a case-by-case basis, and implement where appropriate, 30kph speed limits in residential neighbourhoods in order to enhance safety and to promote walking and cycling”.

This would align with an objective in the Transport Strategy (section 5.7) which states: “In conjunction with local authorities and An Garda Síochána, evaluate, and where appropriate seek the implementation of, lower speed limits on residential streets and in urban centres”.

7. Reference Number 8.20

In relation to MT016A, it is recommended that the following is added at the start of the insertion *"Subject to a feasibility assessment,"*

8. Reference Number 8.21

In relation to MT016A, it is dubious that a pedestrian / cycle bridge could be provided given the space constraints in this area and the need for long ramps for cyclists / prams / wheelchairs. If this objective is to be retained, it is recommended that the following is added at the start of the insertion *"Subject to a feasibility assessment,"*

9. Reference Number 8.23

In the Authority's submission on the Draft Development Plan, the removal of this policy was recommended. The revised wording, while noted as a more appropriate approach than the original, is not as clear as might be desired. Consideration might be given to alternative wording such as: *"To minimise the loss of on-street car parking, except where such removal is required for, or in relation to, sustainable transport provision, access to new developments or public realm improvement."*

10. Reference Number 8.24

The Authority recommends that the amendment to Policy MT14 be deleted.


11. Reference Number 8.25

The Transport Strategy requires that all new road development complies with the "Principles of Road Development" set out in section 5.8.3 of the Transport Strategy. Accordingly, it is recommended that the following text should be added to the end of the introductory paragraph of MT027 *"... and subject to compliance with the "Principles of Road Development" set out in the Transport Strategy"*.

The requirement for a new bridge over the Liffey connecting Fishamble Street and Arran Street East has not been identified in the City Centre Transport Study. The description in the amended draft also does not set out its proposed function, i.e. general traffic, public transport and cycling or pedestrian only. As such its inclusion in the Development Plan cannot be supported by the Authority and it is recommended that it is removed, or its function clarified in a manner that could be supported by the Authority.

I trust that the views of the Authority will be taken in to consideration by Dublin City Council in the finalisation of the City Development Plan.

Yours sincerely,



Hugh Creegan

Director of Transport Investment and Taxi Regulation