

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

12th May 2015

Re: Fingal County Development Plan 2017-2023 Issues Paper

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to submit comments on the pre-draft issues paper of the Fingal Development Plan 2017-2023.

Section 31B(1) of the Planning and Development Act 2000¹ 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.*

Transport Investment Priorities

The Authority is currently in the process of preparing a Transport Strategy for the Greater Dublin Area (GDA). The draft strategy is due to go out on public consultation in June 2015, and the finalised plan will be published in autumn 2015. This document will set out the programme for investment in

¹ As inserted by Section 95 of the Dublin Transport Authority Act 2008

strategic transport across the GDA to 2035, and will have a critical bearing on the location, timing and scale of development in Fingal.

It is essential that in preparing the Development Plan, Fingal County Council are cognisant of the transport proposals evolving from the NTA Strategy, and that the draft Development Plan fully reflects the proposed transport options set out in the NTA Transport Strategy. The Authority would welcome the opportunity to liaise directly with the Development Plan team in this regard.

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 Fingal County Council are reflected in the new Development Plan, with particular reference to the primary routes and proposed greenways in the county.

In relation to shorter term transport projects, the Authority's Integrated Implementation Plan has set 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 Fingal County Council on the Sustainable Transport Measures Grants Programme comprises the implementation of these objectives on a local scale on a rolling annual basis. The draft Development Plan should also reflect the implementation of these transport initiatives.

Protecting Strategic Transport Infrastructure

The forthcoming NTA Transport Strategy will provide a basis for the future location, timing and scale of new development in Fingal. It is vital however that existing strategic transport infrastructure is utilised and managed appropriately, to ensure that transport in Fingal, and the Greater Dublin Area, continues to function into the future.

In this regard, the Authority recommends that a clear policy is inserted into the plan which states that zoning for employment uses will be done in a manner which protects investment in the national road network, in accordance with Chapter 2 of the Department of Environment, Community and Local Governments guidelines on 'Spatial Planning and National Roads', and seeks to prevent inappropriate levels of commuter traffic from using such routes in the County.

The M1 and M50 are vital economic corridors for Dublin, and the east coast in general, and should not be used to facilitate the development of employment which would be more appropriately developed close to existing public transport services and/or the key settlements of Swords, Blanchardstown or indeed within Dublin City Centre. In particular, substantial development at the Airport should not proceed until it can be clearly demonstrated that it will not have a significant impact on the carrying capacity of the M1 or the M50, and that any development would not impact on national accessibility to Dublin International Airport.

The Development Plan should clearly state that any significant future employment developments in the vicinity of strategic road network will be dependant of the ability to provide an appropriate level of non-car based transport options. These strategic public transport options will be outlined in the draft NTA Transport Strategy.

General Land Use Recommendations

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

- High volume, trip intensive developments, such as offices and retail, should primarily be focussed into Swords and Blanchardstown town centres, and at selected locations adjacent to high capacity public transport;
- 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;
- Except in limited circumstances such as where specific physical requirements exist for the siting and operation of a particular land use, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high quality public transport;
- The strategic transport function of the M1, M2, N3 and M50 should be maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network;
- 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;
- 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, should be prioritised over development in less accessible locations such as the urban fringe or villages and towns beyond the contiguous built-up urban footprint;
- 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;

- 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.

The Authority requests your consideration of the above comments and would welcome further discussion and cooperation in the making of the draft Fingal Development Plan.

Yours sincerely,



Michael MacAree
Head of Integrated Planning